Chapter 20: Alternatives

A. INTRODUCTION

OVERVIEW

As required by SEQRA, the FEIS includes an assessment of alternatives to the Farley/Moynihan project. The analysis first considers the No Action Alternative, in which the construction of the Moynihan Station and the disposition of the property to a designated developer are not undertaken. As noted in Chapter 2, "Analytical Framework," the No Action Alternative incorporates the reuse of currently vacant and underutilized space in the Farley Complex (consistent with USPS property management). As a result, the No Action Alternative also provides an alternative to avoid or reduce project-related significant adverse impacts.

This chapter considers two alternatives that arose from the developer designation process. The first alternative is the possibility that the Phase I program could include, in addition to the Moynihan Station, an alternative use for the Western Annex—a new sports arena. This alternative would also include the redevelopment of the current Madison Square Garden (MSG) site and a new, improved Penn Station. Under this alternative (the Arena Alternative), it is assumed that the proposed project would continue to include the 1.1 million-gross-square-foot building on the Development Transfer Site (See "Description of the Arena Alternative" below). The second alternative considers utilizing all of the unused development rights from the Farley Complex, which would add approximately 1 million square feet of additional development potential at an undetermined location. A station-only alternative has not been considered, because it is not financially viable at this time. (The 1999 EA describes the impacts that could occur if only a station were to be constructed within the Farley Building.)

For each of the relevant technical areas presented in this EIS, the anticipated impacts of the proposed project are compared to those that would result from each of the alternatives, as relevant.

PRINCIPAL CONCLUSIONS

The No Action Alternative, like the proposed project, is not expected to result in any significant adverse impacts that cannot be mitigated. The historic impact identified from the proposed project (only from the Scenario 1 overbuild Phase II option) would not occur with the No Action Alternative. Mitigated impacts for traffic and pedestrians identified from the proposed project could be reduced but not fully eliminated with the amount of development proposed in the No Action Alternative.

The Arena Alternative would be expected to add substantial new development to the area based on the redevelopment of the MSG site and improvements to Penn Station, which would occur as a result of the alternative. However, because the status of and plans for this alternative are unresolved, it is treated in this EIS as a "generic" alternative. A detailed examination of impacts and their mitigation cannot be undertaken until a more complete development plan is proposed. As a result, for this alternative to be pursued, a Supplemental Environmental Impact Statement (SEIS) would be required.

Similarly, the Full Development Alternative would seek to provide an additional 1 million square feet of development potential above that proposed in the Future With the Proposed Action. This would likely occur from the off-site transfer of development rights similar to the proposed Phase II Development Transfer Site scenario. However, since no single receiving site for the additional development rights has been identified, the alternative would first have to define a comprehensive master plan identifying the location and amount of development to be transferred. Since this would involve substantially more development than the proposed project, and has the potential to result in a variety of new or different impacts than the proposed project, and since little is known about how the alternative could be implemented, it is assumed that for the Full Development Alternative to be pursued, an SEIS would be required.

B. NO ACTION ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

Under the No Action Alternative, USPS would not sell the Farley Complex to ESDC/MSDC**,** Moynihan Station would not be constructed**,** and ESDC/MSDC would not dispose of the property to a designated developer for reuse and redevelopment. However, under this No Action Alternative, USPS would not be expected to leave the Farley Complex in its current reduced state of occupancy or utilization. as noted elsewhere in this EIS, with or without the proposed project, USPS has initiated the consolidation of mail processing to the Morgan Annex, and USPS would seek to maximize the value and utility of the Farley Complex. It is anticipated that USPS would seek to increase both postal operations and commercial redevelopment opportunities under the No Action Alternative.

The development scenario assumed for the No Action Alternative is the one studied in the 2003 Draft SEA, as follows: as set forth in Table 20-1, the USPS would continue to occupy about 650,100 square feet, or just under half the space in the Farley Complex. The uses would comprise the same 250,100 square feet of the retail and office facilities to be included in the proposed project's Reasonable Worst-Case Development Scenario (RWCDS), along with an additional 400,000 square feet of space for administrative and mail sorting uses. As shown in Table 20-1, this is basically the equivalent of the space devoted to the proposed Moynihan Station in the RWCDS. The USPS would use this space to consolidate administrative and mail sorting functions that currently are fragmented in smaller spaces and leased spaces elsewhere in Manhattan. It is anticipated that about 500 new workers would be based at the Farley Complex with the majority working during regular business hours along with some evening and overnight shift workers. The potential commercial component is assumed to be the same as analyzed in the 2003 Draft SEA, namely, 436,000 square feet of office space and 248,000 of retail space.

ALTERNATIVE COMPARED TO THE PROPOSED PROJECT

LAND USE, ZONING, AND PUBLIC POLICY

The No Action Alternative would produce commercial development in the Farley Complex at a slightly larger level than, but similar to, the Phase I component of the Farley/Moynihan project. Overall, including Phase II, the proposed project would introduce substantially more new development than the No Action Alternative. Like the proposed project, the No Action Alternative would have no significant adverse impact on land use and zoning. However, the No

Table 20-1
Comparison of Land Use Components: No Action and Reasonable Worst-Case Development Scenarios (in square feet)

Land Use Component	No Action	Phase I Build* RWCDS
Train Station	0	300,000
Transit Retail	0	86,000
USPS	650,100	250,100
Commercial Office	436,000	0
Hotel**	0	210,000
Commercial Retail	248,000	448,000
Entertainment Retail	0	0
Merchandise Mart	0	0
Banquet Facilities	0	35,000
Common Areas	50,250	50,250
Docks/Service	24,000	24,000
Office Core/Lobby	0	5,000
TOTAL	**1,408,350**	**1,408,350**

Notes:
* See Table 1-1 in Chapter 1, "Project Description."
** Divide by 1,000 to estimate approximate number of hotel rooms.

Action Alternative would not be consistent with key public policies that identify the need for an efficient intermodal transportation facility at Pennsylvania Station (Penn Station) that meets New York's complex future transportation needs.

SOCIOECONOMIC CONDITIONS

Like the proposed project, the No Action Alternative would not result in significant adverse impacts in any of the areas of socioeconomic concern. As with the proposed project, the No Action Alternative would not directly displace any residents. In addition, the No Action Alternative would not result in the direct displacement of any businesses, institutions, or employment currently located at the project site, and it would not result in the direct displacement of businesses at the Development Transfer Site—under Scenario 2 of the proposed project, the Phase II development would displace the existing businesses on the Development Transfer Site. USPS is a participating agency and under both the proposed project and the No Action Alternative, USPS would continue to vacate a majority of the Western Annex and relocate its mail processing, sorting, and distribution operations from the Farley Complex to the Morgan General Mail Facility and Annex (the Morgan Facility) and would retain existing postal service retail operations in the historic retail lobby in the Farley Building, as well as some operational, service/mail transfer, postal rail activities, and office space. In the No Action Alternative, however, USPS would retain more of its functions on site than under the proposed project.

The potential to induce indirect displacement of low-income residents would be slightly lower under the No Action Alternative than under the proposed project, because the No Action Alternative would contain no residential use. However, neither the proposed project nor the No Action Alternative would generate a significant adverse residential displacement impact.

Like the proposed project, the No Action Alternative would not result in significant adverse impacts due to indirect business and institutional displacement. All of the uses contemplated under the actions are well established in the study area, which already has a dense and diverse

amount of economic activity. However, unlike the proposed project, the No Action Alternative would not expand the existing base of transportation offerings within the study area, and would not draw new transportation users and visitors to the area within and immediately surrounding the Farley Complex. Similarly, unlike the proposed project, there would be no hotel and banquet facility within the Farley Complex to attract and retain visitors within the study area.

Under both the No Action Alternative and proposed project, commercial establishments along and near Ninth Avenue could experience rent increases, as their property values could increase due to the increased pedestrian traffic. Most of the existing retail stores would benefit from the increased pedestrian flow, allowing them to increase their overall sales and avoid displacement.

In the future background condition common to all alternatives Ninth Avenue would experience upward rent pressures from the introduction of a major mixed-use development project west of the Farley Complex on Ninth Avenue by 2010—this development would be on the Hudson Yards Projected Development Site 33. Under the No Action Alternative, the destination retail and commercial office uses planned for the Farley Complex would also generate increased pedestrian traffic and "cross-shopping" opportunities, which could increase rents in the same area. Therefore, there is a similar potential for indirect business displacement in these limited areas under the No Action Alternative as well as under the proposed project.

Like the proposed project, the No Action Alternative would not significantly affect business conditions in any industry or any category of business within or outside the study area, nor would it indirectly reduce employment or adversely affect the viability of any industry or category of business. Development under the No Action Alternative, like under the proposed project, would not introduce new competing businesses that would drive out or otherwise diminish the performance of any identifiable business sector.

COMMUNITY FACILITIES

Like the proposed project, the No Action Alternative would have no significant adverse impact on police, fire, and emergency services. Under the No Action Alternative, which would not introduce new residential units to the area, there would be no effect on public schools. The No Action Alternative would, therefore, eliminate the modest contribution that Phase II of the proposed project (under scenario 2) would make in 2015 to the more than 3,700 new students anticipated between 2010 and 2025 with the introduction of residential development generated by the Hudson Yards project, the West Chelsea Rezoning, and other known projects in the study area. However, no impacts or additional mitigation measures beyond those resulting from, or provided by, the Hudson Yards redevelopment would occur with, or be required by, the proposed project as described in Chapter 5, "Community Facilities." Overall, the No Action Alternative, like the proposed project, would not have a significant adverse impact on schools in both future analysis years.

OPEN SPACE AND RECREATIONAL FACILITIES

Like the proposed project, the No Action Alternative would not have a significant adverse impact on open space and recreational facilities.

SHADOWS

Because the No Action Alternative does not anticipate the construction of any new additions above the Farley Complex, like the proposed project, it would not have a significant adverse impact from shadows.

HISTORIC RESOURCES

Under the No Action Alternative, there would be neither an overbuild atop the Western Annex nor a new residential building on the Development Transfer Site. Like the proposed project, the historic Farley Complex would be reoccupied by commercial uses, in addition to the retention of certain USPS functions. It is anticipated that this redevelopment would involve exterior changes to the Farley Complex to accommodate the new uses. Any physical changes to the Farley Complex, in addition to the change in use, would be assessed for adverse effects by USPS in consultation with the New York State Historic Preservation Office (SHPO). As required by Section 106 of the National Historic Preservation Act of 1996, USPS would seek and consider the views of the public and afford the Advisory Council on Historic Preservation a reasonable opportunity to comment on the undertaking. Under the No Action Alternative, there would be no creation of a major new train station in the Farley Building to partially retrieve the loss of the historic McKim, Mead & White Pennsylvania Railroad Station.

URBAN DESIGN AND VISUAL RESOURCES

Under the No Action Alternative, the visible changes to the Farley Complex would be substantially less than those of the proposed project. Without the train station, there will be much less need for new midblock entrances and additional skylights, for example. There would also be no overbuild on the Western Annex. In addition, there would be no building on the Development Transfer Site. Although the No Action Alternative would have less effect on urban design and visual resources from changes to the Farley Complex, it, like the proposed project, would not have a significant adverse impact on urban design and visual resources.

NEIGHBORHOOD CHARACTER

The No Action Alternative would introduce less noticeable change in the area (i.e., no new train station, overbuild, or Development Transfer Site building). However, both the proposed project and the No Action Alternative would have no significant adverse impact on neighborhood character as the uses and level of development are consistent with its existing character and are consistent with ongoing trends and public policy goals set forth for the special Hudson Yards District.

HAZARDOUS MATERIALS

With the implementation of appropriate measures, including pre-construction surveys and Health and Safety Plans during demolition and construction, no significant adverse impacts related to hazardous materials would be expected to occur as a result of either the No Action Alternative or the proposed project. With the redevelopment completed (under both the No Action Alternative and the proposed project), hazardous materials would likely still remain in both the Farley Complex and the subsurface, but with the continued implementation of appropriate procedures (to properly manage asbestos, lead paint, etc.), there would be no further potential for adverse impacts.

INFRASTRUCTURE AND ENERGY

Although demand at the project site would be lower with the No Action Alternative, like the proposed project, the No Action Alternative would not have a significant adverse impact on the City's water supply, sewage treatment capacity, solid waste generation, or energy consumption.

TRAFFIC AND PARKING

As described above, the No Action Alternative would result in the same square footage of development at the Farley Complex, but with different land uses. The No Action Alternative would generate substantially fewer person and vehicle trips than the proposed project during the analysis peak periods. Like the proposed project, trips generated by the Hudson Yards project, as well as its proposed mitigation, were included in the No Action Alternative.

2010 Analysis Year

Under the No Action Alternative, neither the proposed on-site components nor the Development Transfer Site building on the east side of Eighth Avenue between West 33rd and West 34th Streets would be built. As a result, the USPS would continue to occupy the Farley Complex and 436,000 square feet of commercial office space would be developed. In addition, the taxi lay-by lane and roadway improvements on West 31st and West 33rd Streets associated with the proposed train station would not be implemented. Taxi drop-off and pick-up trips would remain on Seventh and Eighth Avenues between West 31st and West 33rd Streets under the No Action Alternative, rather than shifting to West 31st and West 33rd Streets between Eighth and Ninth Avenues under the proposed project. Under the No Action Alternative, the four significant adverse traffic impacts that would occur with the proposed project during each of the weekday AM, midday, and PM peak hours, and the 14 significant adverse traffic impacts that would occur during the Saturday midday peak hour with the proposed project would be eliminated, as listed below.

Weekday AM Peak Hour.

- The westbound approach on West 35th Street at Sixth Avenue;
- The eastbound approach on West 30th Street at Eighth Avenue;
- The eastbound approach on West 34th Street at Ninth Avenue; and
- The westbound approach on West 31st Street at Dyer Avenue.

Weekday Midday Peak Hour.

- The westbound approach on West 35th Street at Sixth Avenue;
- The northbound approach on Eighth Avenue at West 31st Street;
- The northbound approach on Eighth Avenue at West 33rd Street; and
- The eastbound approach on West 34th Street at Ninth Avenue.

Weekday PM Peak Hour.

- The westbound approach on West 35th Street at Sixth Avenue;
- The northbound approach on Eighth Avenue at West 31st Street;
- The eastbound approach on West 34th Street at Ninth Avenue; and
- The westbound approach on West 31st Street at Dyer Avenue.

Saturday Midday Peak Hour.

- The westbound approach on West 33rd Street at Seventh Avenue;
- The eastbound and westbound approaches on West 34th Street at Seventh Avenue;
- The eastbound approach on West 30th Street at Eighth Avenue;
- The northbound approach on Eighth Avenue at West 31st Street;
- The northbound approach on Eighth Avenue at West 33rd Street;
- The eastbound left-turn movement on West 34th Street at Eighth Avenue;
- The northbound approach on Eighth Avenue at West 34th Street;
- The eastbound approach on West 30th Street at Ninth Avenue;
- The westbound approach on West 31st Street at Ninth Avenue;
- The eastbound approach and westbound de facto left-turn movement on West 34th Street at Ninth Avenue;
- The westbound approach on West 31st Street at Dyer Avenue; and
- The westbound approach on West 31st Street at Tenth Avenue.

However, with the different land uses and their associated traffic distributions, as described above, certain locations during different analysis peak periods would operate less favorably under the No Action Alternative than under the proposed project. Most notably, the eastbound approach on West 32nd Street at Sixth Avenue, and the southbound approach on Seventh Avenue at West 30th and West 31st Streets would operate less favorably during all analysis peak hours under the No Action Alternative.

As with the proposed project, the No Action Alternative would not result in any parking shortfall or significant adverse impacts on pedestrian safety.

2015Analysis Year

Under the No Action Alternative, the proposed project, including the overbuild components on the Farley Complex, would not be developed; the USPS would continue to occupy the Farley Complex, and 436,000 square feet of commercial office space would be made available. The taxi lay-by lane and roadway improvements on West 31st and West 33rd Streets associated with the proposed train station would not be implemented. Since taxi trips shifting from the existing Penn Station to the proposed Moynihan Station would not occur, the taxi diversions assigned as part of the proposed project traffic analysis would not be applicable in the No Action Alternative traffic analysis. Under the No Action Alternative, the 10, 8, 10, and 18 significant adverse traffic impacts identified for the weekday AM, midday, PM, and Saturday midday peak hours, respectively, for the proposed project would be eliminated, as listed below.

Weekday AM Peak Hour.

- The northbound approach on Sixth Avenue at West 31st Street;
- The westbound approach on West 35th Street at Sixth Avenue;
- The eastbound approach on West 30th Street at Eighth Avenue;
- The northbound approach on Eighth Avenue at West 31st Street;
- The eastbound approach on West 34th Street at Ninth Avenue;
- The westbound approach on West 31st Street at Dyer Avenue;

- The westbound approach on West 31st Street at Tenth Avenue;
- The northbound approach on Tenth Avenue at West 33rd Street;
- The eastbound de facto left-turn movement on West 34th Street at Tenth Avenue; and
- The northbound left and through movements on Tenth Avenue at West 34th Street.

Weekday Midday Peak Hour.

- The westbound approach on West 35th Street at Sixth Avenue;
- The eastbound approach on West 30th Street at Seventh Avenue;
- The eastbound approach on West 30th Street at Eighth Avenue;
- The northbound approach on Eighth Avenue at West 31st Street;
- The northbound approach on Eighth Avenue at West 32nd Street;
- The northbound approach on Eighth Avenue at West 33rd Street;
- The eastbound approach on West 34th Street at Ninth Avenue; and
- The northbound approach on Tenth Avenue at West 33rd Street.

Weekday PM Peak Hour.

- The westbound approach on West 35th Street at Sixth Avenue;
- The westbound approach on West 33rd Street at Seventh Avenue;
- The northbound approach on Eighth Avenue at West 31st Street;
- The westbound approach on West 35th Street at Eighth Avenue;
- The westbound approach on West 31st Street at Ninth Avenue;
- The eastbound approach on West 34th Street at Ninth Avenue;
- The westbound approach on West 31st Street at Dyer Avenue;
- The eastbound approach on West 30th Street at Tenth Avenue;
- The westbound approach on West 31st Street at Tenth Avenue; and
- The northbound right-turn movement on Tenth Avenue at West 34th Street.

Saturday Midday Peak Hour.

- The eastbound approach on West 34th Street at Broadway and Sixth Avenue;
- The eastbound approach on West 30th Street at Seventh Avenue;
- The westbound approach on West 33rd Street at Seventh Avenue;
- The eastbound and westbound approaches on West 34th Street at Seventh Avenue;
- The eastbound approach on West 30th Street at Eighth Avenue;
- The northbound approach on Eighth Avenue at West 32nd Street;
- The northbound approach on Eighth Avenue at West 33rd Street;
- The eastbound left-turn movement on West 34th Street at Eighth Avenue;
- The northbound approach on Eighth Avenue at West 34th Street;
- The eastbound approach on West 30th Street at Ninth Avenue;
- The westbound approach on West 31st Street at Ninth Avenue;

- The eastbound approach and westbound de facto left-turn movement on West 34th Street at Ninth Avenue;
- The westbound approach on West 31st Street at Dyer Avenue;
- The westbound approach on West 31st Street at Tenth Avenue; and
- The westbound approach on West 33rd Street at Tenth Avenue.

However, with the different land uses and their associated traffic distributions, certain locations would operate less favorably during different analysis peak periods with the No Action Alternative than with the proposed project. Most notably, the southbound approach on Broadway at West 34th Street, the eastbound approach on West 32nd Street at Sixth Avenue, and the southbound approach on Seventh Avenue at West 30th and West 31st Streets would operate less favorably during all analysis peak hours under the No Action Alternative.

As with the proposed project, the No Action Alternative would not result in any parking shortfall or significant adverse impacts on pedestrian safety.

TRANSIT AND PEDESTRIANS

As described above, the No Action Alternative would result in the same square footage of development at the Farley Complex, but with different land uses. The No Action Alternative would generate substantially fewer person trips than the proposed project during the analysis peak periods. Like the proposed project, trips generated by the Hudson Yards project, as well as its proposed mitigation measures would occur under the No Action Alternative.

2010 Analysis Year

Under the No Action Alternative, neither the proposed on-site components nor the Development Transfer Site building at Eighth Avenue between West 33rd and West 34th Streets would be built. As a result, the USPS would continue to occupy the Farley Complex and 436,000 square feet of commercial office space would be developed. In addition, the new Moynihan Station and associated transit and pedestrian improvements would not be implemented. Without these changes, pedestrian elements would deteriorate as compared to today, such that 4 corners, 12 crosswalks, and 2 midblock sidewalks would operate at a substandard LOS E or F. However, without the addition of project-generated pedestrian trips, the following locations would not be further degraded as they would be with the proposed project:

- Northeast and northwest corners of West 33rd Street and Ninth Avenue;
- East and west crosswalks of West 34th Street and Eighth Avenue;
- West crosswalks of West 33rd Street and Ninth Avenue;
- East, south, and west crosswalks of West 33rd Street and Eighth Avenue;
- North, south, and west crosswalks of West 33rd Street and Seventh Avenue;
- East crosswalk of West 31st Street and Ninth Avenue; and
- East and west crosswalks of West 31st Street and Eighth Avenue.

Because the No Action Alternative would not result in pedestrian improvements on the project site, sidewalks along West 31st Street, West 33rd Street, and Ninth Avenue would not be widened. Furthermore, the subway stairway on the southwest corner of 33rd Street and Eighth Avenue would remain in its current location, which would continue to restrict the sidewalk and corner flows at this location.

As with the proposed project, the No Action Alternative would not result in any significant adverse transit impacts.

2015 Analysis Year

Under the No Action Alternative, the proposed project, including the overbuild components on the Farley Complex, would not be developed; the USPS would continue to occupy the Farley complex and 436,000 square feet of commercial office space would be developed. In addition, the new Moynihan Station and associated transit and pedestrian improvements would not be implemented. Without these changes, pedestrian elements would deteriorate as compared to today such that 4 corners, 16 crosswalks, and 4 midblock sidewalks would operate at a substandard LOS E or F. However, without the addition of project-generated pedestrian trips, the following locations would not be further degraded as they would with the proposed project:

- Northeast corner of West 33rd Street and Ninth Avenue in the midday peak period;
- Southwest corner of West 33rd Street and Ninth Avenue;
- Northwest corner of West 33rd Street and Eighth Avenue;
- Northeast corner of West 33rd Street and Seventh Avenue;
- East and west crosswalk of West 34th Street and Eighth Avenue;
- East crosswalk of West 33rd Street and Ninth Avenue;
- North, east, west, and south crosswalk of West 33rd Street and Eighth Avenue;
- North, south and west crosswalk of West 33rd Street and Seventh Avenue;
- North crosswalk of West 31st Street and Eighth Avenue;
- North, east and west crosswalks of West 31st Street and Eighth Avenue; and
- West crosswalk of West 31st Street and Eighth Avenue.

Because the No Action Alternative would not result in pedestrian improvements on the project site, sidewalks along West 31st Street, West 33rd Street, and Ninth Avenue would not be widened. Furthermore, the subway stairway on the southwest corner of 33rd Street and Eighth Avenue would remain in its current location, which would continue to restrict the sidewalk and corner flows at this location.

As with the proposed project, the No Action Alternative would not result in any significant adverse transit impacts.

AIR QUALITY

Like the proposed project, the No Action Alternative would not have a significant adverse impact on air quality, either from mobile, stationary, or industrial sources of pollution.

NOISE

Like the proposed project, the No Action Alternative would not result in a significant adverse noise impact.

CONSTRUCTION IMPACTS

The construction activities associated with the No Action Alternative involve substantially less new construction (and no off-site construction activities) and more interior renovation. It is

anticipated that, like the proposed project, there would be localized, temporary disruptions, but there would not be any significant adverse construction related impacts. As with the proposed project, USPS retail uses, Penn Station, and Eighth Avenue subway lines would remain in operation in or adjacent to the Farley Complex during construction.

PUBLIC HEALTH

Like the Proposed Action, the No Action Alternative would have no significant adverse impact on public health.

C. ARENA ALTERNATIVE: RELOCATED MADISON SQUARE GARDEN PLUS MIXED-USE DEVELOPMENT TRANSFER SITE BUILDING

DESCRIPTION OF THE ARENA ALTERNATIVE

As discussed in Chapter 1, "Project Description," an alternative concept generated by Developer C (the conditionally designated developer) would locate MSG in the Western Annex, west of a new train concourse, while providing the floor area for the Farley Complex's unused development rights at the Development Transfer Site on the east side of Eighth Avenue between West 33rd and West 34th Streets. With the Arena Alternative, the current MSG site would be entirely redeveloped and the existing Penn Station would be substantially improved.

The Arena Alternative would serve a number of purposes that are different from and in addition to the principal purposes of the proposed project, namely, the preservation of the Farley Complex and the construction of the Moynihan Station. Most notably, the Arena Alternative provides for a comprehensive plan and integrated architectural design that also allows for improving the aesthetic and functional character of the existing Penn Station/MSG complex. It is anticipated that a reconfigured and enlarged Penn Station would complement the Moynihan Station functionally by allowing for even greater expansion of capacity for the increased number of passengers expected to travel to the West Side due to expansion of train service planned by New Jersey Transit and increases in area resident and worker populations generated by new Hudson Yards development. Developer C has indicated that the design of the development would include large areas of public spaces and natural light-filled concourses and that the façade of the new development would be compatible with the Farley Complex's architectural historic character (particularly by replacing the current MSG, a 40-year-old modernist structure that has no contextual relationship with the Farley Complex).

Based on currently available information about the proposed alternative and on existing zoning for the site, the 16-acre area encompassing the Arena Alternative could be redeveloped or reused to allow for 8.3 million square feet of mixed-use development, which includes the 1.4 million-square-foot Farley Complex, the 1.1 million-square-foot building on the Development Transfer Site, and the 5.8 million square feet of development on the MSG site (potentially including office, retail, and residential uses).

ANALYTICAL FRAMEWORK FOR THE ARENA ALTERNATIVE

Although the Arena Alternative could be a possible development option, the status of and plans for the alternative are unresolved and not sufficiently detailed to support a full SEQRA review. Accordingly, the Arena Alternative is treated in this EIS as an alternative. Based on the

combination of information about the alternative now known to the lead agency from concept plans prepared by Developer C and assumptions as to what a maximum envelope of environmental impacts could be, a reasonable worst-case development scenario for the Arena Alternative has been developed for the purposes of this alternative analysis. Because this is a "generic" alternative analysis and not a full SEQRA analysis of the Arena Alternative, mitigation of possible impacts is not included. It is noted that the configuration of the Arena Alternative as potentially examined in a future SEIS could change in terms of size or mix of uses based on a more detailed and refined development plan.

For these reasons, should the ESDC and MSDC decide to pursue the Arena Alternative, more detailed supplemental studies would be prepared and presented in an SEIS. This "segmented" review is warranted in this case, for several reasons, as follows. First, although Developer C has requested ESDC to consider the Arena Alternative, it has not submitted a sufficiently detailed proposal with respect to either the design or the business arrangement for this alternative. Second, it would not be in the public interest to delay the environmental review of the Proposed Action pending the further development of the Arena Alternative. Moreover, Developer C's commitment to construct Moynihan Station is in no way dependent on the approval of the Arena Alternative, and the objectives for the Proposed Action would be achieved whether or not MSG is moved to the Farley Complex. The final design and construction for the Moynihan Station would not be deferred while an Arena Alternative is being considered.

Moreover, a segmented review is no less environmentally protective in this case, because the cumulative impacts of Moynihan Station and the MSG relocation are addressed as appropriate in this EIS, on a generic and qualitative level, and would be specifically and thoroughly addressed in an SEIS, should the Arena Alternative be pursued. In particular, the SEIS would analyze the environmental impacts of all facets of the alternative proposal, including the relocation of MSG, any resulting modification to the Farley Complex, the new Penn Station, and other redevelopment of the MSG site.

The EIS assumption for the Arena Alternative is that it would reconstruct the interior of the Western Annex to create a new MSG west of the train concourse. In contrast to the proposed project, the intermodal hall would not be in the Farley Building—but rather relocated east of Eighth Avenue into the new Penn Station, although the train concourse and station would be maintained in the Farley Building. The train hall would occupy the Farley Building courtyard, which would remain enclosed with a curved glass roof.

In the worst-case scenario, it is assumed that postal services would be vacated and absorbed at nearby facilities such as the Morgan Annex. If moved, the retail function would be accommodated on the block east of Eighth Avenue, which would be redeveloped as part of this alternative (see description below).

In the worst-case scenario, it is assumed that the current USPS retail area on Eighth Avenue above the grand steps would be adaptively reused as an entrance to both the Moynihan Station and the new MSG. Other entrances to MSG would be available on West 31st and West 33rd Streets just west of Eighth Avenue, in the center of both side streets, and in the center of the Ninth Avenue façade of the complex. Like the proposed project, access to the station would be available from Eighth Avenue on either side of the grand stairs and also midblock on West 31st and West 33rd Streets, Truck access to the complex would be from West 31st Street. Trucks could descend ramps built in the "moat" of the building, underneath new entrance stairs to the station and arena, to loading areas on the lower level. The plan would also provide back-in truck docks on West 31st Street in the approximate location of the existing loading docks.

Under this alternative, development at the Development Transfer Site would be the same as that under the proposed project. However, it is assumed that the Arena Alternative would also redevelop the MSG site above a greatly improved and enlarged Penn Station. A similar scenario was considered in the Hudson Yards FGEIS as an optional projected development site. Under this Hudson Yards scenario, MSG would have relocated to Ninth Avenue between West 31st and West 33rd Streets across from the Farley Complex on Projected Development Sites 32 and 33 over the Amtrak right-of-way. The MSG site was assumed under the Hudson Yards scenario to be redeveloped with a total of approximately 5.8 million square feet comprising 4.7 million square feet of office use, a 1 million-square-foot hotel, and 133,000 square feet of retail space. The existing MSG Site is located in the Pennsylvania Station Subarea (Farley Corridor Subdistrict) of the Special Hudson Yards District; the subarea covers the area between Seventh and Eighth Avenues and West 33rd and West 30th Streets. Redevelopment in the Pennsylvania Station Subarea is governed by several requirements related to streetwalls, public space, through-block connections, public plazas, and ground floor retail. A maximum floor area ratio of 19 can be achieved through transportation improvements and, again assuming a worst-case scenario, transfer of floor area from the historic Farley Complex. It is assumed that these requirements would be followed, and that the development would receive a floor area bonus for major improvements to Penn Station.

Redevelopment of the MSG site would include substantial improvements to the existing Penn Station. Developer C has indicated that up to 3 acres of public spaces, open to the sky and covered by large glass roofs, would be created and would provide for a visual connection to the Farley Building across Eighth Avenue. These spaces would include a new train hall and intermodal hall. New and improved vertical circulation would lead from the intermodal hall in Penn Station to the concourse and platform levels with connection to existing subway lines. A new concourse would connect across the block, along the axis of 32nd street from Seventh to Eighth Avenues.

This analysis assumes that under the Arena Alternative the MSG site would be redeveloped primarily with the development assumed for it in the Hudson Yards FGEIS, but that mixed-use development would also occur at Projected Development Sites 32 and 33 on the west side of Ninth Avenue between West 31st and West 33rd Streets, since MSG would not be relocating to those sites, as was the assumption in the Hudson Yards FGEIS. This would be a reasonable worst-case development scenario for most environmental impact analyses. However, the worst case scenario for transportation would contain more retail space than the 133,000 square feet assumed in the Hudson Yards FGEIS. The analysis below assumes that the development on the MSG site would have the same amount of retail space as the Farley Complex under the proposed project. The worst case for schools and open space would be a development containing residential use. Although such use would require a zoning use change and possibly other land use actions by the City, in the interest of covering all possibilities in this generic analysis approach, a maximum of 4,500 units of housing are assumed for the land use and zoning, schools, open space, and neighborhood character analyses.

It is also assumed that development of the arena and the Development Transfer Site would occur during Phase I (i.e. by 2010) of the project. Redevelopment of the MSG site could only occur after Phase I, and for EIS purposes it is assumed to occur by the 2015 analysis year.

ALTERNATIVE COMPARED TO THE PROPOSED PROJECT

LAND USE, ZONING, AND PUBLIC POLICY

Land Use

The Arena Alternative would create substantially more development than the proposed project, and would introduce a use to the Farley complex different from the uses contemplated in the proposed project. Nonetheless, like the proposed project, the Arena Alternative would not result in a significant adverse impact on land use. The arena use proposed for the Farley Complex is not new to the area, since MSG has operated across the street from the project site for nearly 40 years. The potential commercial uses (office, hotel, retail) on the MSG redevelopment site are typical of Midtown Manhattan, and would therefore be compatible with their surroundings. Residential use, if it were to be included in the redevelopment, would be new to the immediate project area; the combination of the potential residential use on the Development Transfer Site and on the MSG site across the street would create a strong residential presence along Eighth Avenue from West 31st to West 34th Street. Although this would change the character of this limited area (see discussion below), the new residential use would be compatible with the substantial residential use on West 34th Street and in the blocks to the south of the MSG site. In addition, residential use on the MSG site, as well as the Development Transfer Site, would help to fulfill one of the stated purposes of the Special Hudson Yards District—to create a vibrant, 24-hour neighborhood in West Midtown.

Compared to the proposed project, the Arena Alternative would, in the worst-case scenario, alter the Farley Complex as the site of the new Moynihan Station by moving the intermodal hall into the new station located on the current MSG site. Through this change and by adding another train hall on the east side of Eighth Avenue, the Arena Alternative would engage the entire Penn Station complex as one large transportation center straddling Eighth Avenue. This approach would have the potential, depending on the actual design, to greatly improve the existing Penn Station by introducing new, modern vertical circulation improvements, providing a naturally day-lit train hall and offering a glass-roofed intermodal hall spanning from West 31st Street to West 33rd Street and a concourse, reminiscent of the original historic Penn Station. The Farley Complex would continue to have a glass-roofed train hall and the full train station as in the proposed project.

Zoning and Public Policy

Like the proposed project, the Arena Alternative would have no significant adverse impact on zoning and public policy. Current zoning does not permit, as-of-right, an arena use on the Farley Complex site, nor does it permit residential use on the MSG redevelopment site. For the Farley Complex site, the arena would need an override by ESDC. Residential use could be permitted through a similar override, or through a City land use action in response to an application. Either action would require SEQR or CEQR review. In considering such an application, or in coordinating with ESDC on an override, the City would have to determine that the loss of potential commercial office space in this prime location would not materially affect the public goal of the Special Hudson Yards District to provide enough Class A office space to accommodate the economic growth projected for the future.

SOCIOECONOMIC CONDITIONS

Like the proposed project, the Arena Alternative would not result in significant adverse impacts in any of the areas of socioeconomic concern. As with the proposed project, the Arena Alternative would not directly displace any residents. In addition, the Arena Alternative would not result in direct displacement of any businesses, institutions, or employment currently located at the Farley Complex. USPS as a participating agency, under both the proposed project and the Arena Alternative, would vacate the Western Annex and relocate its mail processing, sorting, and distribution operations from the Farley Complex to the Morgan General Mail Facility and Annex (the Morgan Facility). In the Arena Alternative worst-case scenario, it is assumed that USPS would also relocate existing postal service retail operations to the new development on the MSG site. Potentially, no USPS functions would remain in the Farley Complex.

Like Scenario 2 of the proposed project, development of a primarily residential or mixed-use building on the Development Transfer Site under the Arena Alternative would result in the displacement of the three businesses at that location, including a Duane Reade drug store, a restaurant and bar (Local Café and Cocktails), and a fast food establishment (Café 34). In addition, a number of businesses in the existing Penn Station/MSG complex could be displaced when the site is redeveloped. However, like Scenario 2 of the proposed project, the Arena Alternative would not have anticipated socioeconomic impacts as these businesses are typical of a midtown location, and their displacement together or individually, would not represent a significant alteration of the economic character of the study area.

Unlike the proposed project, under the Arena Alternative the current MSG site would be redeveloped with approximately 5.8 million square feet of mixed-use commercial, retail, and perhaps residential development. All of the uses projected for the Arena Alternative are well established in the study area, which already has a dense and diverse amount of economic activity. However, if a worst case development scenario containing a maximum of 4,500 residential units is assumed, a detailed analysis of the potential for impact from indirect residential displacement would be required, before a judgment as to impact could be made.

Like the proposed project, the Arena Alternative would not result in significant adverse impacts due to indirect business and institutional displacement. Under both the Arena Alternative and the proposed project, commercial establishments along and near Ninth Avenue could experience rent increases, as their property values could increase due to the increased pedestrian traffic. Most of the existing retail stores would benefit from the increased pedestrian flow, allowing them to increase their overall sales and avoid displacement.

In the future background condition common to all alternatives, Ninth Avenue would experience upward rent pressures from the introduction of a major mixed-use development on Hudson Yards Projected Development Site 33 by 2010. Under the Arena Alternative, the destination sports/entertainment and retail uses planned for the Farley Complex would also generate increased pedestrian traffic and "cross-shopping" opportunities, which could increase rents in the same area. Therefore, there is a similar potential for indirect business displacement in these limited areas under the Arena Alternative as under the proposed project. Like the proposed project, the Arena Alternative would not significantly affect business conditions in any industry or any category of business within or outside the study area, nor would it indirectly reduce employment or adversely affect the viability of any industry or category of business. Like the proposed project, development under the Arena Alternative would not introduce new, competing businesses that would drive out or otherwise diminish the performance of any identifiable business sector.

COMMUNITY FACILITIES

The Hudson Yards FGEIS identified significant adverse impacts on schools from anticipated increases in development through both the Hudson Yards and West Chelsea rezoning actions. These impacts were to be mitigated by construction of an addition to one school, up to two new schools, plus administrative actions that could make more space available in existing schools. With an assumed worst-case total of 5,440 units of housing, 1,088 of which could be for low- to moderate-income residents, the Arena Alternative would add 588 elementary- and 120 intermediate-school students to the demand for school seats. This would likely create a significant adverse impact above that identified in the Hudson Yards FGEIS. Should the Arena Alternative be pursued, the SEIS would quantify any impacts created by the Arena Alternative and address additional mitigation to reduce or eliminate this impact.

Like the proposed project, it is anticipated that the New York Police Department (NYPD) would continue to evaluate its staffing needs and assign personnel based on population growth, area coverage, crime levels, and other local factors and there would be no significant adverse impacts on its operations under the Arena Alternative. Like the proposed project, the Arena Alternative is not expected to displace existing fire station houses or related emergency medical service facilities and, on its own, would be unlikely to result in impacts to these facilities at current service levels. Specific issues of the density of development and the proximity of train traffic would need to be reviewed by FDNY once a more definite program for the Arena Alternative is developed to determine the potential for impacts or if additional mitigation measures beyond those resulting from, or provided by, the Hudson Yards rezoning be required for the Arena Alternative.

OPEN SPACE

The Arena Alternative including the MSG site redevelopment would generate substantially more new employees, visitors, and residents to an area of limited open space resources than would the proposed project. Both the intermodal hall and pedestrian concourse would be located in the new development on the MSG site, providing new open space and through block connections on the block between Seventh and Eighth Avenues. Unlike the proposed project, the Arena Alterative would not include the West 32nd Street pedestrian corridor to Ninth Avenue or the intermodal hall in the Farley Building.

In 2010, like Scenario 2 of the proposed project, the open space ratios with the Arena Alternative would decrease by less than 5 percent in 2010 in the ½-mile study area due to the residential development at the Development Transfer Site. It is anticipated that if MSG would relocate to the new arena at the Western Annex under the Arena Alternative there would be minimal increases in the number of visitors and workers to the study area from the arena. Thus, exclusive of the MSG site redevelopment, the Arena Alternative would be expected to have no significant adverse impact on open space and recreational facilities.

For conditions in 2015, with the Arena Alternative and full development of the MSG site, for the worst-case open space scenario (i.e., maximum residential use) there would be an increase in residential population (about 9,700 residents) and small reductions in the area's publicly accessible open space (0.40 acres) from the loss of outdoor plazas on the project sites. Collectively, this redevelopment could result in a decrease in all the open space ratios by more than 15 percent in the ½ -mile study area by 2015. However, this worst-case analysis does not assume any new open space in the redevelopment program. Developer C has indicated that it would include up to 3 acres of new public space within the new station. If the Arena Alternative

were to be pursued instead of the proposed project, the ultimate development plan for the MSG site redevelopment would be critical to enable a more substantial assessment of the potential for adverse impacts to open space resources, and the identification of potential mitigation measures, as required, associated with the alternative.

SHADOWS

Under the Arena Alternative, there would be no overbuild atop the Western Annex (as proposed by Scenario 1 of the proposed project), and the intermodal hall would not be located in the Farley Complex, although the skylight over the train hall would be maintained, as compared to the proposed project. Therefore, incremental shadows cast on the intermodal hall would not be considered under this alternative. In other respects, the first phase of this alternative would be similar to that of the proposed project's Scenario 2, and the shadow effects would be the same. Neither Scenario 2 of the proposed project nor the Arena Alternative would create significant shadow impacts in 2010.

Redevelopment of the existing MSG site under the Hudson Yards FGEIS development scenario has the potential to result in significant adverse shadow impacts on the Farley Complex—specifically the Eighth Avenue colonnade and steps that are a sunlight-dependent feature of the historic resource and are also considered an open space—which would not occur under the proposed project. Therefore, if this alternative were pursued, substantially more information would be required regarding the proposed redevelopment of the existing MSG site in terms of the building bulk and height and potential mitigation measures, before a conclusion as to the 2015 shadow effects of the alternative could be made.

HISTORIC RESOURCES

As a condition of designation, the developer is required to restore the façade of the Farley Complex, and so the façade treatment of the Arena Alternative is assumed to be similar to that of the proposed project, and in this respect the alternative would have beneficial historic effects. The architectural design of the new station spaces, the arena, and other facilities would be modern, but the final design of the Phase I portion of the alternative would be developed in consultation between the developer, ESDC/MSDC, and OPRHP to ensure compatibility with the historic character of the Farley Complex. As with the proposed project, construction protection measures would be developed and implemented in consultation with OPRHP to avoid adverse impacts on the Farley Complex exterior and the interior spaces to be preserved as part of the proposed project. In addition, if any potential adverse impacts on the Farley Complex were to be identified as part of this alternative, mitigation would be developed by Developer C and ESDC/MSDC and included in the LOR to be executed with OPRHP. Such mitigation could include specifications for the treatment of affected historic features and the general requirement for ongoing consultation as the design develops. Protection for nearby historic resources would be the same as under the proposed project.

However, the Arena Alternative would differ from the proposed project in its reuse of the Farley Complex and its potential treatment of the west wall of the original Farley building. And in 2015 under the Arena Alternative, the MSG site would be completely redeveloped with 5.8 million square feet in a mix of uses, including major improvements to Penn Station. By conceiving of the two sites as one integrated transportation complex, the Arena Alternative has the potential to reestablish a strong functional and architectural connection between the Farley Complex and the Penn Station complex. At this point, however, there is not enough information to know the type

or extent of effect that the Arena Alternative could have on historic resources. If the Arena Alternative were to be pursued, the SEIS would have to examine issues of use, historic features and historic context based on detailed design information.

URBAN DESIGN AND VISUAL RESOURCES

In 2010, the urban design and visual resources effects of the Arena Alternative would be similar to those of Scenario 2 of the proposed project. There would be no changes to block form and street pattern, street hierarchy, building arrangements, building bulk, and topography and natural features from redevelopment of the Farley Complex because the arena, like the program under the proposed project, would be constructed within an existing building. The façade of the Farley building, which is a visual resource, would be improved. Under this alternative, there would be changes to building use, type, signage, and streetscape elements from redevelopment of the Farley Complex to contain a modern arena. In addition, it is possible that the domed roof above the arena could be a prominent visual addition to the Farley Complex, depending on final design.

In 2015, under the Arena Alternative, the existing MSG site would be densely developed, increasing the mix of uses and building types around the Farley Complex. While the redevelopment would notably alter the setting of the Farley Complex, the Arena Alternative could present an opportunity to reestablish the architectural relationship between the Farley Complex and Penn Station and create a new visual connection between the two facilities. The Arena Alternative would also change the urban design of the study area by redeveloping a large site occupied by an arena with a new complex of modern buildings that differ in height, bulk, and massing. The redevelopment of the MSG site would reestablish the streetwalls of the former Pennsylvania Station and reorient the block towards Eighth Avenue, establish major new entrances into the station complex and provide major new public spaces within the existing superblock.

As described above, redevelopment of the existing MSG site would be governed by the Pennsylvania Station Subarea requirements of the Special Hudson Yards Zoning District related to sidewalk widenings, streetwalls, public space, through-block connections, public plazas, and ground floor retail. To fully describe the changes to the urban design and visual resources of the study area under the Arena Alternative, substantially more information would be required regarding the proposed redevelopment of the existing MSG site in terms of the mix and size of uses, proposed height, streetscape elements, building form, and identification of actions. As noted above under Historic Resources, the MSG site sits in juxtaposition to the Farley Complex. Redevelopment of that site would greatly influence the visual context of the Farley Complex, and that influence could be either beneficial or adverse, depending on the ultimate design.

NEIGHBORHOOD CHARACTER

In comparing the Arena Alternative to the proposed project, the first characteristic to note is the difference in areas to be developed. Under the proposed project, Scenario 1 would limit all reuse and new development to the 8.5-acre Farley complex itself; Scenario 2 would extend the development across Eighth Avenue to the Development Transfer Site adding 0.8 acres to the area to be redeveloped. In comparison, the Arena Alternative would actually redevelop or reuse nearly 16 acres of land in West Midtown. Using the reasonable worst-case development scenario for the Arena Alternative, its total new development and new land uses would comprise approximately 8.3 million square feet, compared to the proposed project's 2.5 million square feet in either Scenario 1 or Scenario 2. Thus, the presence of the project under the Arena Alternative

would be substantially stronger than that of the proposed project, and the related change in neighborhood character would be more widespread. In addition, if both the Development Transfer Site and the MSG redevelopment site contained residential use (a reasonable worst-case scenario assumed combined number of 5,440 units), the change in neighborhood character would be more distinct. There has been no residential use along this stretch of Eighth Avenue for 40 years or more.

Nonetheless, neither the proposed project nor the Arena Alternative would generate adverse impacts on neighborhood character from changes in land use or increased density of development. The proposed uses would all be compatible with the surrounding area, and the density on the MSG site would be within that prescribed by underlying zoning. The resulting increases in activity on the Farley Complex site and the Development Transfer Site and, under the Arena Alternative, on the MSG site would all enliven the streets with workers, visitors, and residents, bringing a more human scale to the streetscape despite the presence of two superblocks.

However, until more is known of the changes proposed for the exterior and use of the Farley Complex, including types and locations of signs, changes to the midblock facades, etc., there can be no conclusion of effect on neighborhood character from changes to a historic and visual resource. However, the Arena Alternative, with related redevelopment of the MSG site, has the potential to restore some of the grandeur along Eighth Avenue that used to be created by paired buildings—the Farley General Post Office and the original Pennsylvania Station. Were this to be accomplished in the project design, it would enhance the historic resource and neighborhood character. In addition, with the Arena Alternative, the adverse visual impact on the Farley Complex that would be associated with Scenario 1 of the proposed project (i.e., the overbuild) would not occur.

The proposed project would result in significant adverse traffic and pedestrian impacts, but, because all of those impacts would be mitigated as described in Chapter 19, "Mitigation," there would be no significant adverse impacts on neighborhood character. The addition of traffic from the redeveloped MSG site would add to the impacts of the proposed project, and it is possible that, as a result, not all could be mitigated. However, because the Arena Alternative would not alter the character of traffic in the area—it is heavily traveled now and would be in the future—it would be unlikely to create an adverse neighborhood character impact through changes in traffic.

HAZARDOUS MATERIALS

With the implementation of appropriate measures, including pre-construction surveys and Health and Safety Plans during demolition and construction, no significant adverse impacts related to hazardous materials would be expected to occur as a result of either the Arena Alternative or the proposed project. With the redevelopment completed (under both the Arena Alternative and the proposed project), hazardous materials would likely still remain in both the Farley Complex and the subsurface, but with the continued implementation of appropriate procedures (to properly manage asbestos, lead paint, etc.), there would be no further potential for adverse impacts.

If redevelopment of the existing MSG site were to be pursued, further investigation would take place in order to determine the potential for significant adverse hazardous materials impacts. To fully evaluate the Arena Alternative, were it to be pursued instead of the proposed project, additional information as to the potential for hazardous and contaminated materials on the MSG redevelopment site would be required.

INFRASTRUCTURE AND ENERGY

Like the proposed project, the Arena Alternative would not have a significant adverse impact on the City's water supply, sewage treatment capacity, solid waste generation, or energy consumption. It is anticipated that if MSG would relocate to the new arena at the Farley Complex under the Arena Alternative, there would be no net increase in the water and sewage treatment demand or solid waste generation from the arena.

Like the proposed project, development at the Farley Complex and at the Development Transfer Site under the Arena Alternative would generate a peak water demand that represents an insignificant increase in the average amount of water consumed in Manhattan and that is not expected to significantly affect the local water pressures. As a result, this added demand (under both the proposed project and the Arena Alternative) is not expected to overburden the City's water supply or the local conveyance system. Under peak conditions, the combined sewage generated by development at the Farley Complex and at the Development Transfer Site (under both the proposed project and the Arena Alternative) would represent a relatively small increase in demand compared with the overall flow to the North River Water Pollution Control Plant (WPCP). The estimated peak solid waste volumes generated at the Development Transfer Site (under both the proposed project and the Arena Alternative) would represent a small increase over the City's daily solid waste generation, and is not expected to adversely affect solid waste streams or recycling in the City. Under both the proposed project and the Arena Alternative, the additional energy consumption would be very small compared with the existing energy demands of New York City.

Although the redevelopment of the MSG site would represent a substantial increase in development over the proposed project, within the 43 million-square-foot development envelope of Hudson Yards, the Hudson Yards FGEIS examined a development of 5.8 million square feet at the existing MSG site. It was assumed that given the limits of demand, particularly for commercial space, the 5.8 million square feet, if it were built on the MSG site, would not occur elsewhere in the Special Hudson Yards District. This logic does not apply to residential use, but the amount of additional demand from the maximum number of housing units assumed as a reasonable worst case for the Arena Alternative—5,440—is relatively small compared to overall demands for water and sewer services. Like the proposed project, the Arena Alternative would not have a significant adverse impact on water supply and sewer capacity serving the project area.

In addition, in the Hudson Yards FGEIS, the DEP indicated that there would be adequate water supply to accommodate the demand of the full Hudson Yards development. DEP is pursuing an Amended Drainage Plan to identify specific upgrades to the combined sewer system to accommodate the demand of the full Hudson Yards development. DEP has also indicated that the North River WPCP would have sufficient capacity to handle the increased wastewater demand generated by Hudson Yards. Therefore, redevelopment of the existing MSG site associated with the Arena Alternative, with improvements to the existing water and sewer infrastructure as part of the Hudson Yards project, is not anticipated to have a significant adverse impact on the City's water and wastewater systems.

Redevelopment of the existing MSG site under the Arena Alternative would generate municipal solid waste only from its potential residential component. Commercial solid waste is collected and disposed of by private carters. The amount of waste from the estimated 5,440 units on the Development Transfer and MSG redevelopment sites would be approximately 112 tons/week. This represents 0.11 percent of the City's overall demand for municipal solid waste

management. Therefore, like the proposed project, it is anticipated that the solid waste that would be generated by the Arena Alternative would not create a significant adverse impact nor overburden the ability of private haulers to manage the City's commercial waste.

As described in the Hudson Yards FGEIS, improvements to the existing energy distribution system would be required to accommodate the full projected Hudson Yards development of 43 million-square feet. Therefore as specific designs for future developments within Hudson Yards are prepared, coordination with Con Edison will be necessary to identify electric utility upgrades. Although redevelopment of the existing MSG site is not anticipated to overburden the energy generation, transmission, and distribution system, if this alternative were to be pursued, substantially more information would be required regarding the proposed redevelopment in terms of the mix and size of uses and energy needs, as well as subsequent coordination with Con Edison.

TRAFFIC AND PARKING

The Hudson Yards FGEIS traffic and parking analysis considered a scenario in which MSG would relocate to Ninth Avenue between West 31st and West 33rd Streets on Projected Development Sites 33 and 32 over the Amtrak right-of-way, and the MSG site would be redeveloped for a total of 5.8 million square feet. However, the Hudson Yards FGEIS traffic analyses did not account for the concentrated development in the Farley Corridor under the Arena Alternative that would include: the relocation of MSG to the new arena at the Farley Complex (instead of west of Ninth Avenue), redevelopment of the existing MSG site with the amount of development assumed in the Hudson Yards FGEIS, the mixed-use building proposed for the Development Transfer Site, and mixed-use development at Projected Development Sites 32 and 33 to the west of the Farley Complex between West 31st and 33rd Streets.

As shown on Table 20-2, the vehicular trip generation under the Arena Alternative, considered here, would be considerably higher than for the proposed project. As shown in table 20-2, the Arena Alternative, as described above, would generate 847, 621, 1,122, and 1,670 more vehicle trips during the weekday AM, midday, PM, and Saturday midday peaks, respectively, than the proposed project. Based on this, it would be expected that the number and degree of traffic impacts under the Arena Alternative would be greater than for the proposed project. As a result, if the Arena Alternative were to be pursued, it would be critical for the ultimate development plan for the MSG site redevelopment to assess the potential for significant traffic or parking impacts, and for the identification of potential mitigation measures that would be associated with this alternative.

TRANSIT AND PEDESTRIANS

The Hudson Yards FGEIS transit and pedestrian analysis also considered the scenario in which MSG relocates to Projected Development Sites 33 and 32. However, these analyses (like the traffic and parking analysis) did not account for the concentrated development in the Farley Corridor under the Arena Alternative, as described in the introduction to this section.

As can be seen in Table 20-3 below, the Arena Alternative would generate considerably more transit (subway and bus) and pedestrian peak hour trips compared to the proposed project.

As described above, redevelopment at the existing MSG site would be governed by the Pennsylvania Station Subarea requirements of the Special Hudson Yards District—related to sidewalk widenings, public space, through-block connections, and public plazas. Therefore, if the Arena Alternative were to be pursued, substantially more information would be required regarding the proposed redevelopment of the existing MSG site in terms of the mix and size of

uses, pedestrian spaces, and a subsequent transit and pedestrian analysis would be needed to determine the impact on the surrounding area.

Table 20-2
Arena Alternative vs. Proposed Project
Vehicle Trips

	Arena Alternative		Proposed Project		Increase/Decrease	
	Person Trips	Vehicle Trips	Person Trips	Vehicle Trips	Person Trips	Vehicle Trips
AM	12,263	1,471	4,142	624	8,121	847
MD	28,062	1,698	16,909	1,077	11,153	621
PM	19,409	1,910	9,391	788	10,018	1,122
Sat	35,720	3,143	28,041	1,473	7,679	1,670

Table 20-3
Arena Alternative vs. Proposed Project
Bus, Subway, and Pedestrian Trips

	Arena Alternative	Proposed Project	Increase/Decrease
Bus			
AM	1,123	309	814
MD	1,644	1,073	571
PM	1,603	623	980
Sat	1,912	1,743	169
Subway			
AM	5,586	722	4,864
MD	1,779	1,485	294
PM	6,866	1,050	5,816
Sat	2,819	2,160	659
Pedestrian Trips			
AM	2,960	2,268	692
MD	22,993	12,859	10,134
PM	7,585	6,597	988
Sat	24,884	22,098	2,786

AIR QUALITY

Like the proposed project, the Arena Alternative would not have a significant adverse impact on air quality, either from mobile, stationary, or industrial sources of pollution**.** As described above, the Hudson Yards FGEIS mobile source air quality analysis (which is based on the traffic analysis) considered the scenario in which MSG would relocate to Ninth Avenue between West 31st and West 33rd Streets and its former location would be redeveloped. However, this analysis did not account for the concentrated development in the Farley Corridor under the Arena Alternative. Subsequent mobile source air quality analysis would be needed if the Arena Alternative were to be pursued in order to assess the potential for significant adverse mobile source air quality impacts.

The Hudson Yards FGEIS determined that there would be no significant adverse air quality impacts from emissions from heating, ventilation, and air conditioning (HVAC) systems associated with the redevelopment of the existing MSG site. Although more information would

be required regarding the proposed redevelopment of the existing MSG site in terms of the mix and size of uses and building heights, it is anticipated that the redevelopment of the existing MSG site under the Arena Alternative would not have a significant adverse stationary source air quality impact. It is anticipated that the redevelopment of the existing MSG site under the Arena Alternative would not have a significant adverse air quality impact related to industrial sources since redevelopment would not include any sensitive uses (i.e., residences, schools, hospitals, or parks).

NOISE

The Arena Alternative would result in a substantial increase in the number of vehicular trips compared to the proposed project. Because of the high levels of traffic on the north/south avenues (i.e., Seventh, Eighth, and Ninth Avenues) and on West 34th Street, it is unlikely that the Arena Alternative would result in a significant noise impact, i.e., an increase in Leq(1) noise levels of 3 or more dBA. However, on West 31st and 33rd Streets, which have lower levels of traffic, the additional vehicle trips with the Arena Alternative would have the potential for causing a significant noise impact. In addition, additional building attenuation may be required (compared to the proposed project) in order to satisfy CEQR interior noise level criteria. The need for additional building attenuation and potential noise impacts with this alternative would be examined in an SEIS that would be prepared in the future to examine this alternative.

The existing MSG site is denoted with a noise E-designation that requires future residential/commercial uses to provide a closed-window condition with minimum attenuation of 35 dBA window/wall attenuation on all facades in order to maintain an interior noise level of 45 dBA. In order to maintain a closed-window condition, an alternative means of ventilation must be provided. Although more information would be required regarding the proposed redevelopment of the existing MSG site in terms of the mix and size of uses and building heights, since the E-designation requires minimum building attenuation, redevelopment of the existing MSG site is not anticipated to have significant adverse noise impacts.

CONSTRUCTION IMPACTS

Like the proposed project, the Arena Alternative would have localized, temporary disruptions, although they could be broader (i.e., including the MSG site redevelopment) and longer in duration than with the proposed project. Assuming a similar level of construction management to avoid or minimize construction-related effects, it is likely that the Arena Alternative, like the proposed project, would not be expected to result in significant adverse construction related impacts. However, if the Arena Alternative were to be pursued, additional analysis would have to be performed in order to determine a more accurate construction plan in terms of duration and location of construction sequencing and phasing.

In the worst-case scenario for the Arena Alternative, it is assumed that before commencement of construction all USPS uses would be relocated from the Farley Complex. However, Moynihan Station operations would continue in the Farley Complex under the Arena Alternative. New Jersey Transit (NJT), Long Island Rail Road (LIRR) and Amtrak would continue their operations uninterrupted within Penn Station. In addition, the Eighth Avenue subway lines would remain in operation throughout the construction period. With the implementation of applicable controls and measures, no significant adverse construction impacts in the area of hazardous materials, transportation, air quality, and noise would be expected during the construction period for both the Arena Alternative and the proposed project.

Given the open structure of an arena and the need to fit the arena within the Farley Complex, specific construction considerations for the arena component would have to be further defined and described for construction effects on the historic Farley Complex.

Since the existing MSG is located above Penn Station and the Eighth Avenue subway lines, any construction associated with the redevelopment of the site would need to consider effects on these active transportation uses. Installation of large columns may be required to support the redevelopment overbuild at the existing MSG site. Therefore, if the Arena Alternative were to be pursued, substantially more information would be required regarding the construction activities associated with the proposed redevelopment of the existing MSG site.

PUBLIC HEALTH

Like the proposed project, the Arena Alternative would have no significant adverse impact on public health. As described above, although additional information regarding the proposed redevelopment at the existing MSG site and subsequent analysis would be needed, it is anticipated that redevelopment of the existing MSG site under the Arena Alternative would not result in any significant adverse impacts to hazardous materials, solid waste, air quality, noise, or construction and as a result, there would be no significant adverse impact on public health.

D. ADDITIONAL DEVELOPMENT TRANSFER

DESCRIPTION OF ALTERNATIVE

As described in Chapter 3, "Land Use, Zoning, and Public Policy," the proposed Farley Complex has considerably more development potential than is currently built on the site. The underlying zoning district for the Farley Complex is C6-4 and C6-4 districts have a maximum commercial and community facility as well as a high-density residential, FAR of 10.0. The commercial FAR can increase to 12.0 with a bonus for an urban plaza, although the existing full-block footprint of the Farley Complex precludes the site from obtaining this bonus (unless the Farley Complex was to be physically altered to allow for a different footprint).

The Farley Complex currently contains approximately 3.8 FAR of built floor area indicating that under the current building configuration roughly 2 million square feet of development potential remains unrealized. The proposed project utilizes only 1 million square feet of this unused floor area, leaving about 1 million square feet of remaining unbuilt floor area. Given the inherent value of this development potential, the ESDC as future owner of the property would like to preserve the option of seeking to sell or otherwise utilize these development rights in the future. This alternative considers how this additional development could be realized.

The Full Development Alternative assumes that the additional 1 million square feet of development would be realized through the off-site transfer of development rights in a manner similar to that undertaken by the proposed project under Scenario 2. However, there are no single receiving sites identified for this development option and a master plan would have to be created to identify the applicability and location of potential receiving sites for the full 2 million square feet of development rights. It is also possible that this alternative could be built by combining the overbuild (as described under Scenario 1 of the proposed project) with the Development Transfer Site building. Since ESDC has no current plans to pursue this alternative, there has been no determination of the mix of uses (i.e., commercial or residential) that would be included in any additional development.

Since there are no specific plans nor anticipated actions currently envisioned for the Full Development Alternative, substantially more planning, design, and environmental impact assessment would be required if this alternative were to move forward. Such a change would clearly require the preparation of an SEIS.

ALTERNATIVE COMPARED TO THE PROPOSED PROJECT

Since there is no specific plan with which to assess the Full Development Alternative compared to the proposed project, this alternatives analysis cannot provide a comparative assessment of its potential environmental impacts.

Critical issues that would need to be examined in the SEIS relate to the incremental addition of more residents and/or workers and visitors to the immediate area. This could affect the impact assessment of major analyses in this EIS, including Community Facilities, Open Space, Infrastructure, Traffic and Parking, Air Quality, and Noise.

If a viable master plan were developed for the distribution of development rights to adjacent parcels, new buildings generated along the blocks adjacent to the Farley Complex could result in different impact conclusions to Historic Resources (both due to potential effects on the Farley Complex and to any historic resources located on or adjacent to the potential receiving blocks), Urban Design, and Shadows. Further, the necessity of creating multiple zoning overrides by ESDC to accomplish the transfer of development rights would need to be examined for its potential impact on the integrity of zoning and public policy in the area.

If the Full Development Alternative were to include an overbuild above the Farley Complex, the alternative would have the same impacts identified for the proposed project's overbuild option under Scenario 1, namely, impacts on historic resources. An important consideration for the overbuild option as part of the Full Development Alternative would be the need to incorporate structural requirements necessary to allow its construction if the Full Development Alternative were to be pursued, although it is noted that even with the proposed overbuild construction in the proposed project, no significant adverse impacts during the construction period are anticipated.

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