Zoning for Coastal Flood Resiliency
Chapter 22: Alternatives

A. INTRODUCTION

This chapter presents and analyzes alternatives to the Proposed Action. The New York State Environmental Quality Review Act (SEQRA) requires that alternatives to a proposed action be identified and evaluated in an Environmental Impact Statement (EIS) so that decision makers may consider whether alternatives exist that would minimize or avoid adverse environmental effects. As noted in the 202~~014~~ *City Environmental Quality Review* (CEQR) *Technical Manual*, alternatives selected for consideration in an EIS are generally those that are feasible and have the potential to reduce, eliminate, or avoid a proposed action's impacts considering the objectives and capabilities of the project sponsor. The selection of alternatives to a proposed action is determined by considering the nature of the specific action, its stated purpose and need, potential impacts, and the feasibility of potential alternatives.

Two alternatives to the Proposed Action are evaluated in this chapter: the No-Action Alternative and the No Unmitigated Significant Adverse Impacts Alternative. As required by CEQR and SEQRA, the No-Action Alternative demonstrates environmental conditions that would exist if the Proposed Action was not implemented, providing a baseline for the evaluation of potential impacts associated with the Proposed Action. In the No-Action Alternative, the Proposed Action would not be adopted, the 2013 Flood Text and 2015 Recovery Text would expire, and the current underlying zoning regulations would remain in place in the city's floodplains.

The No Unmitigated Significant Adverse Impacts Alternative provides an assessment of an alternative that would result in no unmitigated impacts, demonstrating the measures that would have to be taken to eliminate the potential unmitigated impacts that have been identified for the Proposed Action. While this alternative may not be feasible in relation to the objectives and capabilities of the project sponsor, it may be included to demonstrate that no alterative exists that could meet the Proposed Action's goals without the potential to result in unmitigated impacts. Other potential alternatives to the Proposed Action were considered but did not substantively reduce the impacts of the Proposed Action while still meeting the project's stated purpose and need.

B. PRINCIPAL CONCLUSIONS

This chapter examines two potential alternatives to the Proposed Action: the No-Action Alternative and the No Unmitigated Significant Adverse Impacts Alternative. Neither alternative would meet the primary objectives of the Proposed Action, which include providing homeowners, business owners, and practitioners living and working in the city's floodplain the option to design or otherwise retrofit buildings to: (a) reduce damage from future flood events, (b) be resilient in the long-term by accounting for climate change, and (c) potentially save on long-term flood insurance costs. Nor would either alternative allow resiliency improvements to be more easily incorporated on waterfront sites at the water's edge and in public spaces, as well as provide zoning regulations to help facilitate the city's long-term recovery from the COVID-19 pandemic and other future disasters. Therefore, the analysis concludes that no feasible alternatives are available that would result in no unmitigated impacts meet the Proposed Action's goals.

C. NO-ACTION ALTERNATIVE

The No-Action Alternative assumes that the Proposed Action is not implemented. Conditions under this alternative are similar to the "Future without the Proposed Action (No-Action Condition)" described in the preceding chapters, which are compared in the following sections to conditions under the Proposed Action.

Although the No-Action Alternative would potentially eliminate the adverse effects of the Proposed Action, the goals and objectives of the Proposed Action would not be met, nor would the associated benefits be realized. In the No-Action Alternative, the city's flood risk will continue to increase with climate change, since sea level rise will increase the potential height of storm surges. The New York City Building Code standards that are tied to today's storm surge projections may not be sufficient to protect buildings from being damaged from future storms under the No-Action Alternative. The No-Action Alternative would not provide clear and simple rules that treat all buildings in the floodplains as similarly as possible; would not guide long-term resilient design across New York City's 1% and 0.2% annual chance floodplains; and would not prepare the city's neighborhoods to withstand future storms.

As detailed in **Chapter 1, "Project Description,"** due to the broad applicability of the Proposed Action, it is difficult to predict the sites where development would be facilitated. In addition, the Proposed Action is not in-and-of-itself expected to induce development where it would not otherwise have occurred absent the Proposed Action. Although the Proposed Action may allow developments and existing buildings to retrofit to resilient standards, the overall amount, type, and location of construction within the affected area is not anticipated to change. Owing to the generic nature of this action, there are no known or projected as-of-right development sites identified as part of the Proposed Action's Reasonable Worst-Case Development Scenario (RWCDS). To produce a reasonable analysis of the likely effects of the Proposed Action, 14 representative Prototypical Analysis Sites containing either new developments, infill, reconstructions, or retrofits of existing buildings in the city's 1% and 0.2% annual chance floodplains were identified to demonstrate the wide range of proposed regulations for sites that would be able to develop as-of-right in the future with the Proposed Action, as detailed further in **Chapter 1**.

Under the No-Action Alternative, existing land use trends and development patterns in the city's 1% and 0.2% annual chance floodplains are expected to continue, albeit without the benefit of special zoning relief provided in the 2013 Flood Text and 2015 Recovery Text. It is expected that the 2013 Flood Text and 2015 Recovery Text have expired under the No-Action Alternative, and it is therefore assumed that each Prototypical Analysis Site would maximize their development under the permitted building envelope. It is expected that new developments would be required to meet the minimum standards of Appendix G of the New York City Building Code for structures in the 1% annual chance floodplain, but not in the 0.2% annual chance floodplain in the No-Action Alternative.

Under the No-Action Alternative in both the 1% and 0.2% annual chance floodplains, new as-of-right development is expected to occur on six of the 14 Prototypical Analysis Sites (Sites 2, 5, 7, 9, 11, and 14), which are vacant lots under existing conditions). In the No-Action Alternative, new buildings on the Prototypical Analysis Sites would be constructed to comply with all height, yard, setback, and parking regulations of their respective underlying zoning districts, without the beneficial zoning relief in the expired 2013 Flood Text and 2015 Recovery Text or the Proposed Action. The remaining eight Prototypical Analysis Sites are expected to remain unchanged in the No-Action Alternative, identical to existing conditions. **Tables 22-1a** and **22-1b** provide summaries of the Prototypical Analysis Sites in the No-Action Alternative in both the 1% and 0.2% annual chance floodplains, respectively; illustrative renderings and further descriptions are provided in **Appendix A**.

Table 22-1a: Prototypical Analysis Sites – No-Action Alternative: 1% Annual Chance Floodplain

Site	Zoning District	Lot Area (SF)	No-Action Scenario	No-Action FAR
1	R3-1	4,000	Two-story + cellar residential building w/ one DU and detached garage (2,900 gsf / 1,800 zsf)	0.45
2	R3-1	2,500	**NEW** two-story residential building w/ one DU and detached garage (1,600 gsf / 1,250 zsf)	0.50
3	R4	2,000	Two-story + basement residential building w/ two DUs (2,835 gsf / 2,700 zsf)	1.35
4	R5	2,500	Three-story + basement residential building w/ three DUs (5,500 gsf / 4,125 zsf)	1.65
5	R7A	11,500	**NEW** seven-story residential building w/ 54 DUs (56,330 gsf / 46,000 zsf)	4.0
6	R6	100,000	Eight-story residential building w/ 320 DUs (270,000 gsf / 240,000 zsf)	2.4
7	R5 / C1-2	12,000	**NEW** four-story mixed residential/commercial building w/ 10 DUs (21,600 gsf / 15,000 zsf)	1.25
8	R7A / C1-2	2,500	Seven-story mixed residential/commercial building w/ 13 DUs (10,800 gsf / 10,000 zsf)	4.0
9	R3-1 / C1-2	10,000	**NEW** one-story commercial building (5,040 gsf / 4,200 zsf)	0.42
10	M1-1	10,000	One-story industrial building (11,500 gsf / 10,000 zsf)	1.0
11	R4	2,500	**NEW** three-story + attic residential building w/ one DU (3,195 gsf / 2,245 zsf)	0.90
12	R3A	2,500	One-story + cellar residential building w/ one DU (2,204 gsf / 1,052 zsf)	0.42
13	R3X	2,000	Two-story + cellar residential building w/ two DUs (2,100 gsf / 1,370 zsf)	0.49
14	R8 / C2-4	50,000	**NEW** Mixed residential/commercial building on a Waterfront Site	N/A

Note: Refer to **Appendix A** for illustrative renderings of the Prototypical Analysis Sites.
*Site 14 illustrates the proposed modifications specific to waterfront regulations for open space. Refer to **Appendix A** for more details.

The No-Action Alternative Compared with the Proposed Action

Land Use, Zoning, & Public Policy

Like the Proposed Action, the No-Action Alternative would not result in significant adverse impacts on land use, zoning, or public policy. No changes to underlying zoning would occur in the No-Action Alternative, and the 2013 Flood Text and 2015 Recovery Text are expected to expire.

As detailed in **Tables 22-1a** and **22-1b**, the No-Action Alternative assumes new as-of-right development on six of the 14 Prototypical Analysis Sites, which is similar to the Proposed Action. However, new buildings on the Prototypical Analysis Sites would be constructed to comply with all height, yard, setback, and parking requirements of the underlying zoning district without the special benefits of the Proposed Action. The new buildings are expected to be generally consistent with the uses and densities that are typical of underlying zoning and existing trends in the city's floodplains.

Socioeconomic Conditions

Similar to the conclusions presented for the Proposed Action, the No-Action Alternative would not result in significant adverse impacts related to socioeconomic conditions. The development of Prototypical

Analysis Sites under the No-Action Alternative would not directly displace any residents, businesses, or employees; would not affect real estate market conditions in a way that would result in indirect displacement of residents or businesses; and would not have an adverse effect on a specific industry such as the construction industry or the housing market. Consequently, like the Proposed Action, the No-Action Alternative would not result in direct or indirect residential displacement, direct or indirect business displacement, or adverse effects on a specific industry.

Table 22-1b: Prototypical Analysis Sites – No-Action Alternative: 0.2% Annual Chance Floodplain

Site	Zoning District	Lot Area (SF)	No-Action Scenario	No-Action FAR
1	R3-1	4,000	Two-story + cellar residential building w/ one DU and detached garage (2,900 gsf / 1,800 zsf)	0.45
2	R3-1	2,500	**NEW** two story + basement residential building w/ one DU (1,600 gsf / 1,250 zsf)	0.50
3	R4	2,000	Two-story + basement residential building w/ two DUs (2,835 gsf / 2,700 zsf)	1.35
4	R5	2,500	Three-story + basement residential building w/ three DUs (5,500 gsf / 4,125 zsf)	1.65
5	R7A	11,500	**NEW** seven-story residential building w/ 54 DUs (63,920 gsf / 46,000 zsf)	4.0
6	R6	100,000	Eight-story residential building w/ 320 DUs (270,000 gsf / 240,000 zsf)	2.4
7	R5 / C1-2	12,000	**NEW** four-story mixed residential/commercial building w/ 10 DUs (20,040 gsf / 15,000 zsf)	1.25
8	R7A / C1-2	2,500	Seven-story mixed residential/commercial building w/ 13 DUs (10,800 gsf / 10,000 zsf)	4.0
9	R3-1 / C1-2	10,000	**NEW** one-story commercial building (5,040 gsf / 4,200 zsf)	0.42
10	M1-1	10,000	One-story industrial building (11,500 gsf / 10,000 zsf)	1.0
11	R4	2,500	**NEW** two-story + attic residential building w/ one DU and detached garage (2,110 gsf / 1,880 zsf)	0.75
12	R3A	2,500	One-story + cellar residential building w/ one DU (2,204 gsf / 1,052 zsf)	0.42
13	R3X	2,000	Two-story + cellar residential building w/ two DUs (2,100 gsf / 1,370 zsf)	0.49
14	R8 / C2-4	50,000	**NEW** Mixed residential/commercial building on a Waterfront Site	N/A

Note: Refer to **Appendix A** for illustrative renderings of the Prototypical Analysis Sites.
*Site 14 illustrates the proposed modifications specific to waterfront regulations for open space. Refer to **Appendix A** for more details.

Community Facilities & Services

The No-Action Alternative, like the Proposed Action, would not have a significant adverse impact on community facilities or services. Prototypical Analysis Sites under the No-Action Alternative would not displace or otherwise directly affect community facilities or services, nor would any site result in a net increment of residents that would exceed thresholds for detailed analysis of public schools, publicly funded childcare facilities, libraries, health care facilities, or police or fire protection service facilities.

Open Space

Similar to the conclusions presented for the Proposed Action, the No-Action Alternative would not result in direct or indirect impacts on open space resources. A review of the Prototypical Analysis Sites

indicates that development under the No-Action Alternative would not encroach on, cause a loss of, or limit public access to open space. Additionally, it would not introduce residential or worker populations that would exceed the thresholds for a preliminary open space assessment for indirect effects. Thus, the No-Action Alternative, similar to the Proposed Action, would not result in direct or indirect impacts on open space resources.

Shadows

The No-Action Alternative would not result in significant adverse shadows impacts. As-of-right development under the No-Action Alternative is expected to affect small, peripheral areas of sunlight-sensitive resources in the immediate vicinity of Prototypical Analysis Sites. However, like the Proposed Action, potentially affected resources would continue to receive direct sunlight throughout the day, and no natural resources are expected to be permanently shaded to a degree that would affect public use or enjoyment, or plant or animal survival. Similar to the Proposed Action, the No-Action Alternative would not result in significant adverse shadow impacts.

Historic & Cultural Resources

As with the Proposed Action, the No-Action Alternative would not result in significant adverse indirect (contextual) or shadows impacts to historic architectural resources. However, the No-Action Alternative would introduce new development on six of the Prototypical Analysis Sites, which could potentially have archaeological significance. As with the Proposed Action, the extent of effects on archaeological resources in the No-Action Alternative is unknown because of its generic nature, and it is therefore not possible to know exactly where and to what extent additional in-ground disturbance may occur. As such, the possibility of effects on archaeological resources cannot be eliminated in the No-Action Alternative, similar to the Proposed Action.

Additionally, the No-Action Alternative would introduce new development on six of the 14 Prototypical Analysis Sites, which could potentially contain New York City Landmark (NYCL)-eligible or privately owned State/National Register of Historic Places (S/NR)-eligible or S/NR-listed historic architectural resources. Therefore, direct impacts to these historic resources through as-of-right development in the No-Action Alternative cannot be ruled out, similar to the Proposed Action. Furthermore, this new development could be in close proximity (within 90 feet) to resources eligible for designation as NYCLs or for listing on the S/NR. These eligible resources would not be provide additional protection under the New York City Department of Buildings (DOB)'s Technical Policy and Procedure Notice (TPPN) #10/88. As such, development in the No-Action Alternative could result in construction-related impacts to historic architectural resources, similar to the Proposed Action.

Urban Design & Visual Resources

Like the Proposed Action, the No-Action Alternative would not result in significant adverse impacts on urban design or visual resources. No changes to underlying zoning would occur in the No-Action Alternative, and the 2013 Flood Text and 2015 Recovery Text are expected to expire.

As detailed in **Tables 22-1a** and **22-1b**, the No-Action Alternative assumes new as-of-right development on six of the 14 Prototypical Analysis Sites, which is similar to the Proposed Action. However, new buildings on the Prototypical Analysis Sites would be constructed to comply with all height, yard, setback, and parking requirements of the underlying zoning district without the special benefits of the Proposed Action. The new buildings are expected to be generally consistent with the uses and bulks that are typical of underlying zoning and existing trends in the city's floodplains. However, without the zoning allowances and enhanced design requirements of the Proposed Action, the trends of uninviting and

incongruous streetscapes in the city's floodplains would continue, negatively affecting the pedestrian experience in these areas as compared to the future with the Proposed Action.

Natural Resources

Review of the Prototypical Analysis Sites indicates that the No-Action Alternative would not directly displace any water resources, wetland resources, upland resources, or significant, sensitive, or designated natural resources such that adjacent natural resources would be adversely affected. As such, like the Proposed Action, no significant adverse impacts on natural resources would occur in the No-Action Alternative.

Hazardous Materials

As with the Proposed Action, the No-Action Alternative would introduce new development on six of the 14 Prototypical Analysis Sites, increasing in-ground disturbance on sites with potentially hazardous materials. As with the Proposed Action, the extent of effects on hazardous materials in the No-Action Alternative is unknown because of its generic nature, and it is therefore not possible to know exactly where and to what extent additional in-ground disturbance may occur. As such, the possibility of effects on potential hazardous materials cannot be eliminated in the No-Action Alternative, similar to the Proposed Action.

Water & Sewer Infrastructure

Similar to the Proposed Action, the No-Action Alternative would not affect water and sewer infrastructure. The relatively modest size of the as-of-right development anticipated on each of the Prototypical Analysis Sites under the No-Action Alternative would be too small to significantly and adversely affect water supply, or wastewater or stormwater conveyance or treatment. Like the Proposed Action, the No-Action Alternative would not have a significant adverse impact on water and sewer infrastructure.

Solid Waste & Sanitation Services

Like to the Proposed Action, the No-Action Alternative would result in significant adverse solid waste and sanitation services impacts. The relatively modest size of the as-of-right development anticipated on each of the Prototypical Analysis Sites under the No-Action Alternative would be too small to significantly and adversely affect water solid waste and sanitation services. Like the Proposed Action, the No-Action Alternative would not have a significant adverse impact on solid waste and sanitation services.

Energy

Similar to the Proposed Action, the No-Action Alternative would not result in significant adverse impacts related to energy. Under the No-Action Alternative, the as-of-right development on the Prototypical Analysis Sites would not be large enough to generate levels of energy sufficient enough to affect the City's energy systems. Like the Proposed Action, incremental energy consumption under the No-Action Alternative would not adversely affect the generation or transmission of energy.

Transportation

Like the Proposed Action, the No-Action Alternative would not result in significant adverse transportation impacts related to traffic, transit, pedestrian, or parking facilities. Similar to the Proposed Action, in the No-Action Alternative, the 14 Prototypical Analysis Sites would be distributed throughout

the floodplains of the city's five boroughs, and incremental development at each site would not exceed the minimum development densities in Table 16-1 of the *CEQR Technical Manual*. Fewer than 50 peak hour vehicle trips, 200 peak hour subway/rail or bus transit riders, and 200 peak hour pedestrian trips would be generated at any one Prototypical Analysis Site. Therefore, like the Proposed Action, the No-Action Alternative would not have the potential for significant adverse transportation impacts.

Air Quality

Under the No-Action Alternative, similar to the Proposed Action, emissions from traffic demand in the study areas would increase as a result of background growth and as-of-right development likely to occur in the city's floodplains. Additionally, like the Proposed Action, development densities for each Prototypical Analysis Site would not exceed the thresholds for a mobile source screening assessment.

With respect to stationary sources, development under the No-Action Alternative would be as-of-right and is not expected to result in significant adverse air quality impacts from emissions related to fossil fuel-fired heat and hot water systems of nearby buildings. Similar to the Proposed Action, the No-Action Alternative would not induce the development of industrial uses in areas not zoned manufacturing, nor is it expected to introduce new sensitive receptors in or close to existing industrial uses or manufacturing-zoned areas. The No-Action Alternative would not result in major or large emission sources, nor would it result in large-scale development that could be affected by large or major emissions sources. Therefore, like the Proposed Action, significant adverse air quality impacts are no expected under the No-Action Alternative.

Greenhouse Gas Emissions & Climate Change

Similar to the Proposed Action, the No-Action Alternative would not cause significant adverse impacts with respect to greenhouse gases or climate change. As-of-right development of Prototypical Analysis Sites would not involve energy-intense projects or result in new development greater than 350,000 sf. Additionally, it should be noted that, in contrast to the Proposed Action, the No-Action Alternative would not provide beneficial zoning relief to encourage resilient building design in the city's floodplains that would help protect from future climate change.

Noise

Like the Proposed Action, the No-Action Alternative would not result in significant adverse noise impacts. The Prototypical Analysis Sites would not generate vehicular traffic increases of 100 percent or more in the No-Action Alternative, which is equivalent to a noise level increase of three dBA or more. In addition, the No-Action Alternative would not increase the placement of sensitive receptors near trains, airports, or other mobile source generators. Therefore, significant adverse noise impacts attributed to mobile sources would not occur in the No-Action Alternative. Stationary source noise impacts are also not expected because it is assumed that rooftop mechanical equipment for all development would be enclosed and comply with New York City Noise Code requirements. Accordingly, similar to the Proposed Action, significant adverse noise impacts are not expected under the No-Action Alternative.

Public Health

Similar to the Proposed Action, the No-Action Alternative would not result in significant adverse impacts related to air quality, water quality, or noise. While the No-Action Alternative could result in significant adverse unmitigated impacts related to hazardous materials, like the Proposed Action, the potential for these impacts to occur is expected to be limited and would not significantly affect public health. Therefore, no significant adverse public health impacts are not expected as a result of the No-Action Alternative, similar to the Proposed Action.

Neighborhood Character

Like the Proposed Action, the No-Action Alternative would not result in significant adverse impacts on any of the following technical areas that contribute to neighborhood character: land use, zoning, and public policy, socioeconomic conditions, open space, urban design and visual resources, shadows, transportation, or noise. As discussed above and detailed in **Chapter 7, "Historic & Cultural Resources,"** significant adverse impacts to archaeological resources, direct impacts to privately owned NYCL-eligible, S/NR-eligible, or S/NR-listed architectural resources, and construction-related impacts to eligible resources would occur under the No-Action Alternative, similar to the future with the Proposed Action. However, the defining features of neighborhood character would not be adversely affected by these potential impacts. Therefore, like the Proposed Action, the No-Action Alternative would not result in a significant adverse impact on neighborhood character.

Construction

New new development on the Prototypical Analysis Sites in the No-Action Alternative could be in close proximity (within 90 feet) to resources eligible for designation as NYCLs or for listing on the S/NR. These eligible resources would not be provide additional protection under the DOB's TPPN #10/88. As such, development in the No-Action Alternative could result in construction-related impacts to historic architectural resources, similar to the Proposed Action.

D. NO UNMITIGATED SIGNIFICANT ADVERSE IMPACTS ALTERNATIVE

The No Unmitigated Significant Adverse Impacts Alternative examines a scenario in which components of the Proposed Action are changed in order to specifically avoid unmitigated significant adverse impacts associated with the Proposed Action. The potential for unmitigated significant adverse impacts is attributed to an increase in in-ground disturbance on eight of the 14 Prototypical Analysis Sites in the future with the Proposed Action, as well as as-of-right alterations to potential NYCL-eligible or privately owned S/NR-eligible or S/NR-listed historic architectural resources during retrofitting in the future with the Proposed Action.

As detailed in **Chapter 7, "Historic & Cultural Resources,"** and **Chapter 10, "Hazardous Materials,"** the Proposed Action could lead to incremental in-ground disturbances on eight of the Prototypical Analysis Sites (Nos. 1, 2, 3, 6, 9, 11, 12, and 13). This as-of-right development could occur on sites where archaeological resources or hazardous materials may be present. As such, potential significant adverse impacts with respect to archaeological resources and hazardous materials cannot be eliminated on these sites.

On sites owned or controlled by the City, or sites that require discretionary approvals, the New York City Landmarks Preservation Commission (LPC) would review any potential impacts to archaeological resources, and would require that these impacts be mitigated to the fullest extent possible pursuant to the *CEQR Technical Manual*. However, on privately owned sites that do not require discretionary actions, the anticipated in-ground disturbances would occur as-of-right without LPC oversight. It is anticipated that these effects would be limited; however, there is no mechanism for the City to conduct or require a program to test the archaeological resources prior to construction. Additionally, for potential hazardous materials impacts, there would be no mechanism for the City to conduct or require a program to test for hazardous materials contamination or to mandate the remediation of such materials during as-of-right in-ground disturbances on privately owned properties. Therefore, any such archaeological or hazardous materials impacts could remain unmitigated.

Additionally, as detailed in **Chapter 7**, it is possible that Prototypical Analysis Sites may contain LPC-eligible or privately owned S/NR-listed or S/NR-eligible historic architectural resources. Therefore, direct impacts to these historic resources through as-of-right alterations or demolitions, eliminating character-defining details of these historic buildings, in the future with the Proposed Action cannot be ruled out. As such, the Proposed Action has the potential to result in significant adverse direct impacts to NYCL-eligible resources or privately owned S/NR-eligible or S/NR-listed buildings. Because development resulting from the Proposed Action on these sites would be as-of-right, the City would not have a mechanism to mitigate such potential significant adverse effects, and impacts could remain unmitigated.

Furthermore, as discussed in **Chapter 7**, the retrofits/reconstruction of existing buildings are expected to occur on eight of the 14 Prototypical Analysis Sites in the future with the Proposed Action. Due to their generic nature, it is not known whether any of the Prototypical Analysis Sites would be located within close proximity to any NYCL-eligible and/or S/NR-eligible historic resources. Therefore, for conservative analysis purposes, it was assumed that these Prototypical Analysis Sites would be located within 90 linear feet of NYCL-eligible and/or S/NR-eligible resources. As such, the Proposed Action has the potential to result in significant adverse construction-related impacts. As the resources are not S/NR-listed or NYCL-designated or calendared, they would not be afforded the added special protections under DOB's TPPN #10/88. On sites located within 90 linear feet of eligible historic resources that are owned or controlled by the City, or that require discretionary approvals, LPC would review any potential construction-related impacts to architectural resources and would require that construction on sites incorporates Construction Protection Plans pursuant to the *CEQR Technical Manual* in order to avoid significant adverse construction-related impacts. However, on privately owned sites that do not require discretionary actions within 90 linear feet of eligible historic resources, there is to mechanism for the City to enforce added special protections under DOB's TPPN #10/88, and potential construction-related impacts could remain unmitigated.

Substantial changes to the Proposed Action would be necessary to "remove" the applicable regulations that may allow for incremental ground disturbances and alterations/demolitions to eligible structures during building retrofits, in order to eliminate the potential for unmitigated significant adverse impacts. The proposed changes to bulk and yard requirements, permitted obstructions, mechanical equipment, parking, and streetscapes would largely need to be removed in order to avoid additional lot coverage and/or building retrofit alterations/demolitions in the future with the Proposed Action. However, the Proposed Action's purpose requires a comprehensive zoning text amendment that includes these numerous interrelated elements, which are only effective when implemented collectively. Thus, to effectively achieve the Proposed Action's objectives, the multifaceted framework detailed in **Chapter 1, "Project Description,"** must be implemented concurrently. Excluding certain proposed rules or implementing individual changes would not fulfill the Proposed Action's need. To achieve the Proposed Action's goals would require undertaking the proposed comprehensive package of regulatory changes to update the Special Regulations Applying in Flood Hazard Areas.

E. CONCLUSIONS

This chapter examines two potential alternatives to the Proposed Action: the No-Action Alternative and the No Unmitigated Significant Adverse Impacts Alternative. Neither alternative would meet the primary objectives of the Proposed Action, which include providing homeowners, business owners, and practitioners living and working in the city's floodplain the option to design or otherwise retrofit buildings to: (a) reduce damage from future flood events, (b) be resilient in the long-term by accounting for climate change, and (c) potentially save on long-term flood insurance costs. Nor would either alternative allow resiliency improvements to be more easily incorporated on waterfront sites at the water's edge and in public spaces, as well as provide zoning regulations to help facilitate the city's long-term

recovery from the COVID-19 pandemic and other future disasters. Therefore, the analysis concludes that no feasible alternatives are available that would result in no unmitigated impacts meet the Proposed Action's goals.