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## Unavoidable Significant Adverse Impacts

According to *the CEQR Technical Manual*, unavoidable significant adverse impacts are those that would occur if a proposed project or action is implemented regardless of the mitigation employed, or if mitigation is infeasible.

As stated in **Chapter 1, "Project Description,"** the principal effect of the proposed action is to affect the location, but not the amount or type, of future hotel development. The introduction of a CPC special permit for new hotels in M1 districts could result in shifting hotel development from M1 districts to other locations where they will continue to be permitted as-of-right but would not otherwise change any rules regulating development in these locations. Accordingly, such effects or differences would not be evaluated as or considered to be significant adverse impacts under CEQR. As a consequence, no unavoidable significant adverse impacts were identified for the proposed action.

A conceptual analysis was conducted to understand how the new special permit could be utilized, and to generically assess the potential environmental impacts that could result from a hotel development in a M1 district pursuant to the special permit (per **Chapter 23, "Conceptual Analysis"**). The conceptual analysis did identify the potential for significant adverse impacts in a number of impact categories. It should be noted that any application for a CPC special permit facilitating hotel development pursuant to the proposed zoning text amendment for hotels in M1 districts would necessitate a separate environmental review that would assess and, if warranted,

disclose significant adverse impacts, define mitigation to reduce or eliminate the impacts, and/or identify those significant adverse impacts that would be unavoidable.