A. INTRODUCTION

This chapter considers alternatives to the action. According to the CEQR Technical Manual, alternatives considered should reduce or eliminate impacts of an action while substantively meeting the goals and objectives of the action. The range of alternatives to be considered, which include a No-Action Alternative, is determined by the nature of the specific action, its potential impacts, the objectives and capabilities of the project sponsor, and feasibility.

In addition to considering the No-Action Alternative, this chapter also considers 3 other alternatives, 2 of which were suggested by the community during the public scoping process and community meetings. Four alternatives are considered in this chapter: (1) a No-Action Alternative; (2) No Unmitigable Traffic Impacts Alternative; (3) Community-Suggested Alternative #1: Relocation of Police Headquarters, in which NYPD headquarters would move from its current location at One Police Plaza to another location in the City; and (4) Community-Suggested Alternative #2: Chatham Green Access Alternative, in which the current checkpoint on Park Row would be moved approximately 125 feet to the south to establish a free-flowing vehicle entrance/exit to Chatham Green.

The chapter discusses the likely environmental effects of each of the four alternatives, and compares them to the action, where applicable.

B. NO-ACTION ALTERNATIVE

The No-Action Alternative assumes that the security plan would not have been implemented and all streets that were closed to unauthorized traffic after September 11, 2001 would be open. The 1999 security street closures and elements as well as the municipal garage closure would be present under the No-Action Alternative. This alternative is discussed and analyzed as the “No-Action Condition” in each of the technical areas of Chapters 2 through 10. This analysis compares conditions under the No-Action Alternative to conditions with the action. The No-Action Alternative assumes that the streets that were closed after September 11, 2001 would be open and none of the security elements would be in place. The No-Action Alternative would not require any discretionary actions. The effects of this alternative are summarized below and compared to those of the action.
Land Use, Zoning, and Public Policy

Under the No-Action Alternative, the current land use trends would continue in the area. Any change in land use that has occurred since the baseline year has occurred independent of the security plan. As with the Action, no significant adverse land use, zoning, and public policy impacts would occur under the No-Action Alternative.

Community Facilities and Services

Under the No-Action Alternative, the streets that were closed after September 11, 2001 would be open to all vehicles. Under the No-Action Alternative, health care facilities in the study area would continue to operate at the same capacity and utilization as they would in the existing or With-Action condition. As emergency service vehicles are currently permitted through the security zone, the No-Action Alternative would not affect emergency service vehicle access to NY Downtown hospital and other healthcare facilities in the area. However, it has been reported, but not verified, that in some instances, emergency service vehicles are delayed by the barriers, although overall response times are not above standard. In addition, under the No-Action Alternative, all commercial and private vehicles would have access through all streets that were closed after September 11, 2001. Furthermore, under the No-Action Alternative, police and fire service vehicles would continue to have access through the streets that are currently closed as a result of the security zone as both are authorized to enter the security zone.

Socioeconomic Conditions

Under the No-Action Alternative, it is generally anticipated that existing economic activities within the study area would remain the same. Although the action has limited accessibility to some parts of the study area, there is no evidence that the limit in accessibility has resulted in any secondary business displacement. The security zone has also not adversely affected the viability of the Chinatown retail and restaurant sectors, which continue to be a major draw for both residents and tourists. No direct or indirect residential or business displacement impacts or adverse effects on specific industries would occur under either the No-Action Alternative or with the Action. Therefore, as with the action, no significant adverse socioeconomic impacts would occur under the No-Action Alternative.
Urban Design and Visual Resources

Under the No-Action Alternative, the urban design in the security zone area would not substantially change from the pre-September 11, 2001 baseline condition. The 1999 security street closures and elements would be present under the No-Action Alternative. Without the action, all streets that were closed after September 11, 2001 would be open and the resulting security elements would not be in place. As such, it is expected that the urban design would not substantially change from the baseline condition under the No-Action Alternative.

Unlike the No-Action Alternative, the action has resulted in significant adverse urban design impacts within the security zone. However, with the implementation of the proposed mitigation plan described in Chapter 11, there would be no significant unmitigated adverse urban design impacts from the action.

Neighborhood Character

In the No-Action condition, without the street closures in place, no significant changes in neighborhood character would have occurred within the security zone from the baseline 2001 year. Although the security zone around NYPD headquarters would not be in place under this alternative, security measures implemented throughout the study area at City Hall and various government and office buildings after September 11, 2001 would continue to be in place. These additional security measures are not part of the baseline condition. However, unlike the action, the No-Action Alternative would not result in the closure of the streets and the security plan elements, which have resulted in a negative alteration of neighborhood character within the security zone. Neighborhood character within the larger study area would remain the same under the No-Action Alternative as under the With-Action condition.

Traffic and Parking

In the No-Action Alternative, traffic and parking demand levels in the study area would increase as a result of general background growth and new developments in the area. Under the No-Action Alternative, 15 signalized intersections would experience congestion on one or more approaches in the AM peak hour, 8 in the midday, and 13 in the PM peak hour. Under the No-Action Alternative, it is anticipated that demand for on-street parking would be similar to With-Action conditions, as the action has not increased demand for public parking.

Unlike the No-Action Alternative, the action has resulted in significant adverse traffic impacts at four (4) signalized intersections in one or more peak periods. The implementation of the proposed mitigation plan described in Chapter 11 would eliminate all of the identified traffic impacts with the exception of those at the intersection of Pearl Street and Robert F. Wagner Sr.
Place. No significant adverse impacts to on- or off-street parking conditions have resulted from either the action or the No-Action Alternative.

**Transit and Pedestrians**

Under the No-Action Alternative, transit and pedestrian facilities in the study area would remain as they were in the pre-September 11, 2001 baseline condition. In the 2006 No-Action condition, the local bus system within the study area would remain unchanged from the baseline condition. However, as a result of the terrorist attacks on September 11, 2001, millions of square feet of office space in Lower Manhattan were lost. This loss of office space resulted in some loss of ridership on local bus routes. Under the No-Action Alternative, local and express buses would not be diverted around the security zone, with the exception of the M9 which would be diverted under the No-Action Alternative.

Under the No-Action Alternative, pedestrian corridors within the study area would remain unchanged from the baseline condition. The 1999 street closures would be in place, but pedestrian access within the security zone would continue to be uninterrupted. Unlike the No-Action Alternative, the action has resulted in the closure of the pedestrian corridor along police headquarters. However, this single low-volume closure has not resulted in congested conditions on other sidewalks in the area. Unlike the No-Action Alternative, the action has resulted in a significant adverse pedestrian impact by creating a high pedestrian accident located at the intersection of Worth Street and Broadway. The implementation of the proposed mitigation plan described in Chapter 11 would eliminate the identified pedestrian safety impact.

**Air Quality**

No violations of the National Ambient Air Quality Standards (NAAQS) or significant increases in mobile source pollutants are predicted to occur under the No-Action Alternative. As with the action, no significant adverse air quality impacts would occur under the No-Action Alternative.

**Noise**

No significant adverse noise impacts are expected to occur at the noise receptor locations under the No-Action Alternative. Unlike the action, noise levels at the intersections of Worth Street and Baxter Street and Worth Street and Mulberry Street would not exceed the impact criterion of 3.0 dBA under the No-Action Alternative. Therefore, there would be no significant adverse noise impacts under the No-Action Alternative.
Conclusion

The necessary security measures needed to protect potential terrorist targets such as NYPD headquarters would not be implemented under this alternative. As such, in the absence of the action, unscreened vehicles would be able to travel within close proximity of potential terrorist targets. Moreover, the No-Action Alternative would not achieve the objectives of NYPD’s Counter Terrorism Bureau to protect government facilities in the “civic center” portion of Lower Manhattan that continue to be considered potential terrorist targets. This alternative is not feasible, as it would not meet the goals and objectives of the action.

C. NO UNMITIGABLE TRAFFIC IMPACTS ALTERNATIVE

As discussed in Chapter 11, “Mitigation,” all significant adverse impacts that have resulted from the action would be fully mitigated with the exception of the unmitigated traffic impact at the intersection of Pearl Street and Robert F. Wagner Sr. Place. As discussed in the chapter, measures were therefore evaluated to address this impact. However, signal timing adjustments to return this approach to its No-Action condition would be impractical as they would result in new or worsened impacts on other approaches and a reduction in pedestrian crossing times. Increasing capacity through changes to curbside regulations or modifications to lane striping was also found to be ineffective, as was widening the approach to achieve an additional lane.

Therefore, to mitigate traffic impacts at the intersection of Pearl Street at Robert F. Wagner Sr. Place, this alternative would re-open Avenue of the Finest between Pearl Street and Park Row. This would ease congestion focused at Pearl Street and Robert F. Wagner Sr. Place by allowing vehicles destined to the City Hall area to access it more directly without having to detour around the security zone. As seen in Figure 12-1, vehicles traveling along this proposed right-of-way would only be able to travel westbound on Avenue of the Finest. A line of bollards would be installed along the northern edge of the proposed right-of-way as a means to maintain security to the Police Plaza area. Security checkpoints would be moved north on Park Row to allow vehicles to travel freely onto Park Row from Avenue of the Finest.

Approximately 160, 120, and 80 vehicles would be diverted to the proposed right-of-way in the respective AM, midday, and PM peak hours. To further address the project’s AM peak hour impact to the westbound left turn movement at Pearl Street and Robert F. Wagner Sr. Place, it is proposed to also transfer 2 seconds of green time from the northbound phase to the westbound phase during the AM peak hour as part of this alternative. As shown in Table 12-1, the AM peak hour westbound left-turn movement would operate at an approach delay of 42.3 (LOS D) as compared to 44.3 (LOS D) in the No-Action. To address the midday peak hour impact to the eastbound approach, transferring 2 seconds of green time from northbound/southbound Pearl
Figure 12-1

Avenue of the Finest No Unmitigable Traffic Impacts Alternative
<table>
<thead>
<tr>
<th>Intersection</th>
<th>Lane</th>
<th>Ratio (sec/veh)</th>
<th>Ratio (sec/veh)</th>
<th>Ratio (sec/veh)</th>
<th>Ratio (sec/veh)</th>
<th>Ratio (sec/veh)</th>
<th>Ratio (sec/veh)</th>
<th>Ratio (sec/veh)</th>
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<th>Ratio (sec/veh)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pearl Street (N-S) @ NB-LTR</td>
<td>0.65</td>
<td>23.1</td>
<td>C</td>
<td>0.63</td>
<td>21.5</td>
<td>B</td>
<td>0.67</td>
<td>24.5</td>
<td>B</td>
<td>0.55</td>
<td>18.9</td>
<td>B</td>
</tr>
<tr>
<td></td>
<td>0.30</td>
<td>18.5</td>
<td>B</td>
<td>0.33</td>
<td>18.6</td>
<td>B</td>
<td>0.35</td>
<td>19.9</td>
<td>B</td>
<td>0.32</td>
<td>18.4</td>
<td>B</td>
</tr>
<tr>
<td>Robert F Wagner Sr. Place (E-W) SB-TR</td>
<td>0.79</td>
<td>22.3</td>
<td>C</td>
<td>0.79</td>
<td>23.3</td>
<td>D</td>
<td>0.85</td>
<td>23.6</td>
<td>D</td>
<td>0.74</td>
<td>22.9</td>
<td>D</td>
</tr>
<tr>
<td></td>
<td>0.30</td>
<td>18.5</td>
<td>B</td>
<td>0.37</td>
<td>19.1</td>
<td>B</td>
<td>0.41</td>
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<td>B</td>
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<td>19.2</td>
<td>B</td>
</tr>
<tr>
<td></td>
<td>0.30</td>
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<td>B</td>
<td>0.36</td>
<td>19.6</td>
<td>B</td>
<td>0.37</td>
<td>20.2</td>
<td>B</td>
<td>0.40</td>
<td>21.2</td>
<td>C</td>
</tr>
<tr>
<td></td>
<td>0.37</td>
<td>18.8</td>
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<td>0.38</td>
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<td>0.40</td>
<td>21.3</td>
<td>C</td>
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<td>0.53</td>
<td>27.4</td>
<td>C</td>
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<td>0.26</td>
<td>15.9</td>
<td>B</td>
<td>0.28</td>
<td>16.2</td>
<td>B</td>
</tr>
</tbody>
</table>

**NOTES:**
- EB-Eastbound, WB-Westbound, NB-Northbound, SB-Southbound
- L-Left, T-Through, R-Right, DfL-Analysis considers a Defacto Left Lane on this approach
- V/C Ratio - Volume to Capacity Ratio, SEC/VEH - Seconds per vehicle
- LOS - Level of service
- * Denotes Congested Location in the 2005 No-Action Condition
- ** Denotes Impacted Location in the 2005 With-Action Condition
Street signal phase to the eastbound Brooklyn Bridge off-ramp phase is proposed as part of this alternative. With the addition of green time, the eastbound level of service would operate under an approach delay of 44.2 (LOS D) as compared to the No-Action delay of 43.6 (LOS D).

The proposed opening of Avenue of the Finest to one-way westbound traffic was reviewed and evaluated by NYPD’s Counter Terrorism Bureau. The result of this evaluation determined that the opening of Avenue of the Finest to passenger vehicles would not provide sufficient stand-off distance from NYPD headquarters. This alternative would not achieve the objectives of NYPD’s Counter Terrorism Bureau to protect government facilities in the “civic center” portion of Lower Manhattan that continue to be considered potential terrorist targets. Therefore, this alternative is not feasible, as it would not meet the goals and objectives of the action.

D. COMMUNITY-SUGGESTED ALTERNATIVE #1: RELOCATION OF POLICE HEADQUARTERS

This alternative was developed in response to suggestions during the public scoping process to explore alternative locations for police headquarters. No specific site has been identified for this possible relocation, although Randall’s Island or Governor’s Island have been suggested because their placement in the East River is thought to provide a natural fortress.

This alternative assumes that police headquarters would be relocated from One Police Plaza to another facility at an undetermined location somewhere in the City. Concurrently, this alternative assumes that the existing One Police Plaza building would be reused for other suitable purposes, such as office or institutional use. It should be noted that, should such a relocation be undertaken, it would also likely require discretionary approvals. Therefore, both the relocation itself as well as the possible re-use of the existing building would be subject to their own site-specific environmental reviews in accordance with applicable laws and regulations.

One Police Plaza, the New York City Police Department’s current 16-story headquarters building, was constructed in 1973. Prior to its construction, police headquarters was located at 240 Centre Street (between Grand and Broome Streets). The current building contains approximately 1 million square feet of floor area, and serves as the NYPD’s central command. It contains most of the department’s administrative functions, and serves as the headquarters for several bureaus/divisions, such as Crime Stoppers, the Criminal Justice Bureau, the Narcotics Division, Organized Crime Control Bureau and the Vice Enforcement Division, among others.

As described in Chapter 2, “Land Use, Zoning, and Public Policy,” One Police Plaza is located in close proximity to a unique concentration of civic and governmental land uses. Several of these are located within the security zone itself, namely, the Municipal Building, the United States Courthouse, containing the U.S. Court of Appeals, the New York County Courthouse, home to
One Police Plaza Security Plan EIS

Chapter 12: Alternatives

the New York State Supreme Court, and a second U.S. Courthouse containing the U.S. District Court, as well as the Metropolitan Correctional Center, which is located on the northwestern corner of Park Row and Pearl Street.

One Police Plaza is also in the immediate vicinity of the Civic Center, which is characterized by a high concentration of government and government-related uses, including several courthouses, and City and state government office buildings. These include the City Hall complex, which includes City Hall Park, City Hall, the Surrogate’s Court/Hall of Records building, and several additional government office buildings including the Jacob Javits Federal Building and the U.S. Court of International Trade.

Given the functions hosted by One Police Plaza, and the close coordination required between the NYPD and the criminal justice system, it is essential for the police headquarters to be located within close proximity to the court facilities and detention centers, as well as the seat of government. For example, the Criminal Justice Bureau acts as the operational liaison between the New York City Police Department and other agencies involved in the criminal justice community, including the five county District Attorney’s Offices, the New York State Office of Court Administration, the Division of Criminal Justice Services, and the Mayor’s Criminal Justice Coordinator’s Office. Given this synergistic relationship, proximity to the court system’s facilities is very important. Although other sites in the city could offer similar or better benefits in terms of floor area or more modern facilities, none can offer a similar or near equal advantage in terms of proximity to the court system and the City’s administrative heart.

Although Randall’s Island and Governor’s Island have been suggested as possible locations, because their placement in the East River is thought to provide a natural fortress, neither of them represents a suitable location for police headquarters in a major city. Governor’s Island in particular, which is only accessible by water, lacks the basic transportation infrastructure that would be essential for linking police headquarters to other court and government facilities in the City as well as to the general public. Randall’s Island, while easily accessible from three of the five boroughs via the Triborough Bridge, is so far removed from the facilities in Lower Manhattan (approximately more than seven miles away), rendering it not easily accessible, especially by transit, to the public, the employees who currently work at One Police Plaza, or other city agencies and government organizations. Such a location would add substantial time and cost to the daily interactions that would be required for New York City’s police headquarters to function properly.

In addition, the relocation of police headquarters would be an expensive undertaking, that would require the City to spend large sums of money to acquire an appropriate site (if no suitable City-owned sites are available), and to construct a new facility and the necessary physical and operational infrastructures that would be required for such a facility.

It should also be noted that, should police headquarters be relocated from the area, the current security measures would not be entirely eliminated. NYPD’s Counter Terrorism Bureau seeks
to protect government facilities in the “civic center” portion of Lower Manhattan, which continue to be considered potential terrorist targets. Given the presence of a number of other sensitive facilities within the security zone (such as the Municipal Building, the United States Courthouse, the New York County Courthouse, the U.S. District Court, and the Metropolitan Correctional Center), all of which would still remain if police headquarters are relocated, it would be necessary to maintain some, if not all, of the current security measures in the area.

Conclusion

The Relocation Alternative would fall far short of the objectives of the action. Moreover, given the concentration of other government facilities in the “civic center” portion of Lower Manhattan which continue to be considered potential terrorist targets, security measures would have to be maintained, and as such the adverse impacts resulting from the action may not be entirely avoided should police headquarters be relocated from One Police Plaza. As such, this alternative is not feasible, as it would not meet the goals and objectives of the action.

E. COMMUNITY-SUGGESTED ALTERNATIVE #2: CHATHAM GREEN ACCESS ALTERNATIVE

Under this alternative, the existing security checkpoint would be moved south on Park Row to establish a free-flowing vehicle entrance/exit to the Chatham Green parking lot. Currently, the security checkpoint is located just south of the corner of Park Row and Chatham Square. All vehicles wishing to access the Chatham Green parking lot must pass through this checkpoint, before entering the parking lot via Park Row. This procedure allows screening of vehicles before they enter the security zone, as control of these vehicles within the zone is not feasible. Vehicles can currently exit the parking lot via either the same location on Park Row, or Pearl Street (northbound).

Under this alternative, the current checkpoint on Park Row would be moved approximately 125 feet to the south in an effort to establish an unscreened free-flowing entrance/exit to the Chatham Green parking lot. As illustrated in Figure 12-2, a 30-foot-wide two-lane access point to the parking lot would be provided at the current location on Park Row. The current parking lot exit along Pearl Street would be sealed off and a turnaround would be established at the southeast corner of the parking lot (refer to Figure 12-2), so that all vehicles would have to exit the parking lot via Park Row. This would be necessary in order to maintain a buffer zone around One Police Plaza. It should be noted that Figure 12-2 shows the Chatham Green Parking Lot Access Alternative together with some of the urban design mitigation measures described in Chapter 11, “Mitigation,” such as the narrowing of Park Row and Pearl Street.
As noted above, in conjunction with the improved access to the Chatham Green parking lot, a physically secured buffer zone around One Police Plaza would be established to maintain stand-off to the police headquarters, as illustrated in Figure 12-2. At the edge of the buffer, a security perimeter would be constructed around the Chatham Green parking lot. The security perimeter would consist of a security wall of approximately 36 to 42 inches in height. This security perimeter would also extend along Park Row from Pearl Street to the proposed Chatham Green parking lot entrance.

This alternative would result in the elimination of approximately 6 dedicated parking spaces in the parking lot along Pearl Street. However, those spaces could be replaced with some minor modifications to the parking lot’s layout, particularly given the extra space that would be available to the east of the security perimeter along Park Row.

Like the action, this alternative would also result in significant adverse traffic, urban design, transit and pedestrians, and noise impacts. As such, the mitigation measures for the action described in Chapter 11 would also be required for this Chatham Green Access Alternative.

This proposed alternative was reviewed and evaluated by NYPD’s Counter Terrorism Bureau and it was determined that this alternative would not allow sufficient stand-off distance between NYPD headquarters and the Chatham Green Houses parking lot. This proposed alternative would allow all types of vehicles into the parking lot (cars, vans, trucks) and there would be no feasible way to mitigate against a possible threat with the proposed stand-off distance. As this stand-off distance would be substantially reduced to an unsafe level, this alternative would not reach the objectives of NYPD’s Counter Terrorism Bureau to protect government facilities in the “civic center” portion of Lower Manhattan that continue to be considered potential terrorist targets. This alternative is not feasible, as it would not meet the goals and objectives of the action.