Chapter 2:

Environmental Analysis

A. INTRODUCTION

This chapter provides an assessment of potential environmental impacts associated with the modifications to the original Proposed Project, as described in Chapter 1, "Revised Proposed Project," and also includes additional environmental analyses, not related to project changes, in the areas of sewer and stormwater infrastructure and construction. As such, this FEIS assesses whether the Revised Proposed Action, would result in any new or substantially different impacts than what were previously described in the DEIS and also presents new proposed mitigation measures where warranted. This chapter does not repeat the environmental analyses contained in the DEIS. Rather, only analyses that have changed are presented herein. The remainder of the environmental analyses within the DEIS is unchanged.

As described in Chapter 1, "Revised Proposed Project," the Applicant has made several modifications to the Proposed Action in response to comments made during the public review period, that address the Applicant's needs in the current and reasonably anticipated future marketplaces, and that further avoid or mitigate potential environmental impacts. These modifications include:

- Re-designed podium façade of the Modified Teutonia Project that recreates the historic Teutonia Hall façade with existing or new materials;
- Widening of the sidewalk along Buena Vista Avenue from Prospect Street to Main Street;
- Increased stepback of the Modified Teutonia Project towers from the podium's façade;
- Decreased window openings on the first few floors (i.e., up to approximately 40 feet above the elevation of the Metro-North Railroad ["MNR"] tracks), on the west, or rear, side of the garage for the Modified Teutonia Project;
- Revised internal parking layouts for the Modified Chicken Island Project structured parking garages;
- Removal of the proposed retail building and stairs at 28 and 30-32 North Broadway, and, consequently, eliminating the need to remove the existing buildings at those lots;
- Removal of the 28 North Broadway (Lot 56) and 30-32 North Broadway (Lot 57) parcels from the North Broadway Site; and,
- Revised Proposed Zoning Amendments that would specifically permit the 1 space per unit ratio only on the Chicken Island Site and the North Broadway Site.

In addition to the changes described above, the Applicant also proposes new mitigation measures, including the following:

• Provision of a minimum of 5 percent electric vehicle charging stations in each garage at each Project Site;

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- Coordination with the adjacent Queens Daughters daycare to incorporate appropriate wind control measures, such as canopies and trellises;
- Replacement of the 24-inch diameter pipe at Ann Street that discharges stormwater to the Saw Mill River with a larger diameter pipe;
- Installation of pumps on both fire and domestic water services as needed to augment the pressure and volume to the Modified North Broadway Project buildings;
- Incorporation of white roofs on each building at each Project Site;
- Existing commercial tenants in good standing will be offered new space in the Proposed Project at market rate rents;
- Relocation assistance for displaced commercial and residential tenants and up to \$5,000 per displaced residential unit in financial assistance to offset relocation costs;
- Quantification of the previously proposed "fair share traffic mitigation fee" of \$650 per dwelling unit, as required by the City, to be paid at the time Certificates of Occupancy are issued by the City for each Revised Proposed Project building;
- Incentives for subcontractors to utilize vans and public transportation to minimize the number of construction worker parked vehicles; and,
- Consultation with the Mt. Carmel Baptist church to offset impacts of incremental shadows to the stained glass windows;

Finally, certain environmental analyses were refined since publication of the DEIS. These refinements include:

- Sanitary and storm sewer capacity analyses; and
- Construction manpower and parking needs.

B. POTENTIAL IMPACTS OF THE REVISED PROPOSED ACTION

The following subsections discuss the changes in the environmental impacts evaluated, and mitigation measures proposed, in the DEIS based on the modifications and refinements listed above.

B.1. LAND USE, ZONING, AND PUBLIC POLICY

There are no changes to the environmental analyses related to land use or public policy.

Comments were received noting that the former proposed change to off-site parking ratios could have large and unintended consequences for development outside of the Chicken Island Site. In response to these comments, the Proposed Zoning Amendments have been revised to provide that the 1 space per unit ratio be specifically permitted only on the Chicken Island Site and the North Broadway Site¹ (see **Appendix C-1**). The proposed decrease in required residential parking at the Chicken Island Site and the North Broadway Site incentivizes the catalytic redevelopment of these two large tracts through

¹ As a result of removing the pedestrian staircase from the North Broadway Project, the North Broadway Site is approximately 50 feet over the distance from the Yonkers Train Station to which the 1 space per unit ratio is currently permitted under the Zoning Ordinance. Rather than amend the existing regulation to accommodate this *de minimis* overage, the Applicant proposes to amend the Zoning Ordinance to specifically provide for that ratio on the site.

the lower cost of development. In addition, and as summarized in the DEIS and this FEIS, evidence from the City of Yonkers and elsewhere around the country indicates that one space per unit adequately satisfies expected demand. Additional information related to new parking demand surveys is included in Chapter 3, "Response to Comments."

As the Revised Proposed Zoning Amendments would not affect any tracts other than the Chicken Island Site and North Broadway Site, there are no off-site impacts of the Revised Proposed Zoning Amendments.

B.2. VISUAL AND COMMUNITY CHARACTER

B.2.a. Modified Teutonia Project

In response to comments received regarding the Teutonia Project's architectural design, scale of the buildings, and narrow street, the Applicant revised the design of several features of the Teutonia Project. These revisions include the construction of a wider sidewalk along the west side of Buena Vista Avenue roughly from Prospect Street to Main Street, a design for the Modified Teutonia Project's podium façade that emulates the historic Teutonia Hall façade using original and recreated materials as feasible given current condition (see Figure 2-1), and increased tower stepbacks from the podium. With the Modified Teutonia Project, the Teutonia towers are proposed to be further stepped back from the facade of the podium than was shown in the DEIS by an additional two feet, for a total stepback of 7 feet for Building 1 and 7 feet 5 inches for Building 2. The towers would be set back as far as possible on the podium, while maintaining the buildings' bulk and massing, and still respecting the 10-foot minimum rear yard setback for residential uses in the D-MX District. Together, these improvements aim to reinforce the primacy of the pedestrian realm and improve the Modified Teutonia Project's relationship to the street level.

Based on discussions with Metro-North Railroad ("MNR"), the Modified Teutonia Project's garage will include fewer window openings on the first few floors (i.e., up to approximately 40 feet above the elevation of the MNR tracks), on the west, or rear, side of the garage.² The Applicant's wind engineer, RWDI, evaluated this change with respect to potential changes in pedestrian-level wind speeds surrounding the site. Based on this evaluation, RWDI concluded that this design change is not anticipated to result in significant changes to the analysis presented in the DEIS as the magnitude of crossflow in the garage through the openings up to a height of 40-feet from the tracks is relatively insignificant compared to the wind flow around the development as a whole (**Appendix D**).

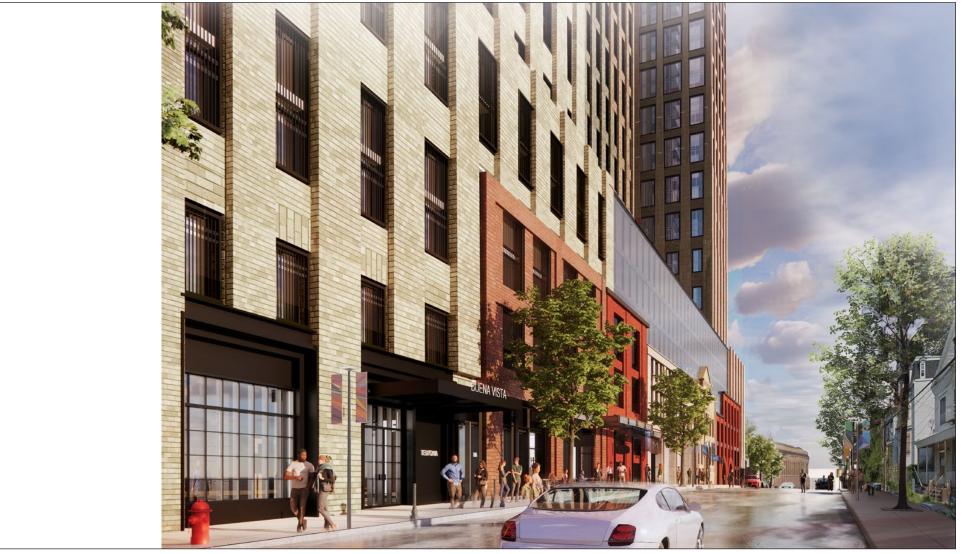
During final design of the Modified Teutonia Project as part of site plan review, the Applicant would work with RWDI and the adjacent Queens Daughters daycare to incorporate appropriate wind control measures, such as canopies and trellises, to disrupt the vertically flowing winds and minimize potential adverse impacts to the outdoor recreational areas of the daycare.

² This change reflects MNR's desire to preserve the ability to construct a structure within the right-of-way, proximate to the lot line and up to 40 feet in height if the need for such a structure exists in the future.

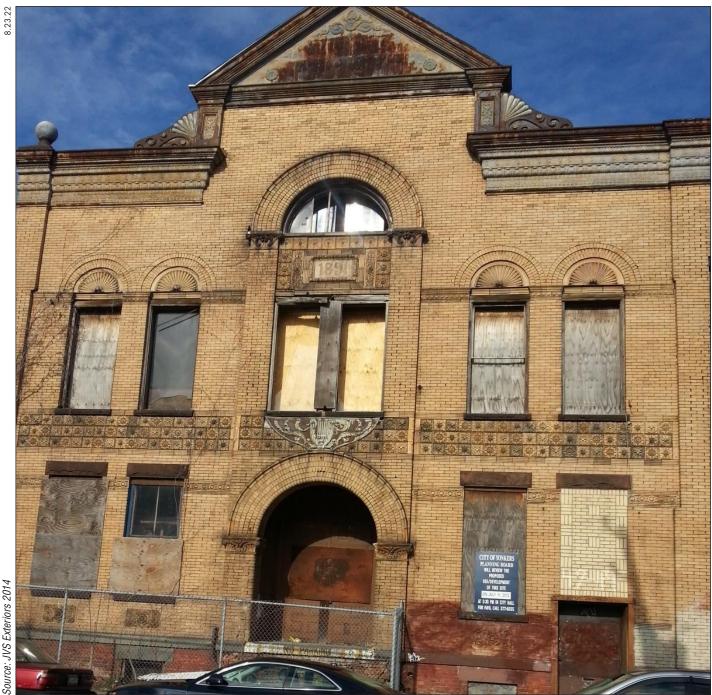




Source: S9 Architecture



Source: S9 Architecture



Source: JVS Exteriors 2014

B.2.b. Modified North Broadway Project

The Modified North Broadway Project eliminates the pedestrian staircase. As stated in Chapter 1, "Revised Proposed Project," this project modification was based on public comments received about the potential safety and maintenance implications of the stair. Removal of this project element eliminates the proposed public access between North Broadway and the Locust Avenue neighborhood. Access for project-residents would still be provided via the two residential lobbies on North Broadway.

B.3. CULTURAL RESOURCES

B.3.a. Modified Teutonia Project

The Modified Teutonia Project would emulate the façade of the former Teutonia Hall building (see **Figure 2-1d**), which was demolished by the site's previous owners. The façade would utilize existing materials to the maximum extent practicable and would recreate those elements that are not able to be salvaged based on the current condition of the materials. This is consistent with the requirement of the unrelated, previously approved multifamily residential development at the site to incorporate the façade into the, at the time, two-story parking garage.

B.3.b. Modified Chicken Island Project

Despite the determination by NYS OPRHP that the Project Sites do not possess archaeological sensitivity, in response to public comments regarding the potential archaeological sensitivity of the Chicken Island Site for archaeological resources, an Unanticipated Discoveries Plan ("UDP") would be prepared for the site. The UDP would describe the procedures to be implemented in the event that any unanticipated archaeological resources are encountered during construction. The UDP would set forth the steps that would be followed, including establishing a chain of command regarding notification of finds among the contractor, the Construction Manager, the Applicant, the Applicant's archaeological consultant, and NYS OPRHP, to ensure that appropriate measures would be taken to investigate, document, and recover significant artifacts while minimizing disruption to the construction schedule.

B.3.c. Modified North Broadway Project

The Modified North Broadway Project does not include demolition of the building at 28 North Broadway, which was determined to be eligible for the New York State and National Register of Historic Places (S/NR). As such, the Modified North Broadway Project would not have an adverse impact on this S/NR-eligible resource. The Modified North Broadway Project still includes removal of the building at 50 North Broadway, which is also a S/NR-eligible building.

B.4. GEOLOGY, SOILS, AND TOPOGRAPHY

The Revised Proposed Project would not change the impacts associated with geology, soils, and topography at the Teutonia Site or Chicken Island Site from what was described in the DEIS.

With respect to the North Broadway Site, removal of the retail building and stair components of the Modified North Broadway Project would result in a de minimis reduction in the volume of earthen material to be exported from the site and a corresponding *de minimis* reduction in the number of associated truck trips for earth removal. The Modified North Broadway Project would also have a smaller increase in impervious surfaces than the North Broadway Project in the DEIS; a 1.00-acre increase compared to a 1.16-acre increase in the DEIS. This change is reflected in the revised stormwater pollution prevention plan, described below.

B.5. SOCIOECONOMICS, FISCAL IMPACTS, AND ENVIRONMENTAL JUSTICE

The removal of approximately 12 percent of the street-level commercial/retail space from the Proposed Project in the DEIS would result in slightly lower property tax revenue for the City than presented in the DEIS, as well as slightly less employment and indirect economic benefits during the Revised Proposed Project's operation and construction. Given that the residential component of the Revised Proposed Project makes up the vast majority of the proposed program, the decrease is considered negligible.

As stated in the DEIS, the Applicant anticipates applying to the Yonkers Industrial Development Agency ("IDA") for financial assistance to make the Revised Proposed Project economically viable. Financial assistance may include mortgage recording tax exemptions, construction period sales tax exemptions, and potentially property tax abatements. To the extent that after review of required cost/benefit analyses the IDA agrees to provide property tax abatements, the Applicant would enter into one or more PILOT agreements with the IDA, which would require payments in lieu of taxes to be made according to a negotiated schedule. The potential terms of PILOT agreements, including the amounts of payments and the duration of the agreements, are not currently known. However, it is expected that the IDA would require payments in lieu of taxes to taxing jurisdictions in amounts sufficient to cover any increased costs incurred by governmental service providers, including Yonkers Public Schools, as a result of the Revised Proposed Project.

As described in Section B.14, "Construction," the Applicant conducted a more detailed evaluation of the anticipated manpower estimated for each phase of construction. Based on this reevaluation, the maximum number of workers onsite during the period of maximum construction overlap between the Project Sites was estimated to be 520, which is considerably lower than the estimate in the DEIS (i.e., 2,190). The revised estimate of the number of onsite construction workers does not change the estimated construction-period economic benefits reported in the DEIS.³ The reason for this is that the economic model used to estimate construction period benefits, IMPLAN, is based on the estimated cost of construction and not the number of workers. IMPLAN uses regionally based industry averages to estimate the overall amount of employment likely to be generated by a given construction project based on a Project's cost. As such, direct on-site employment may be lower than estimated by the model.

³ As mentioned above, the slight reduction in the retail program from what was proposed in the DEIS would result in a small reduction in the construction period economic impacts reported in the DEIS; however, this reduction would be minimal given the relative scale of the Revised Proposed Project's other components.

B.6. COMMUNITY FACILITIES

The Modified North Broadway Project eliminates the public staircase as well as one of the retail buildings and rooftop terraces/public amenity spaces included in the North Broadway Project in the DEIS. This change would result in a de minimis decrease in demand for community facilities and services (i.e., police, fire, and EMS services) as well as a *de minimis* decrease in solid waste generation.

The Modified North Broadway Project would not include publicly accessible open space, resulting in a decrease of approximately 0.25 acres (or 10,735 sf) of publicly accessible open space compared to the North Broadway Project in the DEIS. This decrease in proposed public open space would also result in a correspondingly smaller increase in police service calls. The public spaces that are no longer proposed include several terraces adjacent to the public staircase and on top of the retail building. As such, the Modified Proposed Project would include approximately 100,792 square feet (2.31 acres) of open and outdoor recreational space, including a total of approximately 21,506 square feet (0.49 acres) of publicly accessible open space on the Chicken Island Site. This consists of approximately 13,850 square feet of street level pedestrian plaza in between Chicken Island Project Building 3 and Building 4, an approximately 4,139 square feet plaza at the terminus of John Street at Centre Street (north of the retail pavilion), and approximately 3,518 square feet open space along the currently above-ground section of the Saw Mill River on the New School Street parcel, south of Chicken Island Project Building 5. The remaining 79,286 square feet (1.82 acres) of open and outdoor recreational space of the Revised Proposed Project would be private (for use by residents) and would consist of amenity terraces, including the swimming pools of the Modified Teutonia Project and Modified Chicken Island Project. The reduction in newly constructed public open space would not change the conclusions in the DEIS with respect to the Revised Proposed Project's impact on open and recreational space. The Revised Proposed Project was designed to fit into and within an existing downtown that currently features open spaces and civic spaces characteristic of a downtown urban environment. The Revised Proposed Project is intended, in part, to capitalize on prior City investments, such as the several phases of the Saw Mill River daylighting, that have enhanced the downtown environment and were undertaken to incentivize private investment in new development.

B.7. INFRASTRUCTURE AND UTILITIES

B.7.a. Modified North Broadway Project

The Revised Proposed Project would not change the water or sewer service demand of the Teutonia Project or Chicken Island Project from what was described in the DEIS. Updated water and sewer flow rates and the associated water and sewer service fees were calculated for the Modified North Broadway Project. The estimated water and sewer demand for the Modified North Broadway Project would be approximately 112,580 GPD (see **Table 2-1**). This approximately 1.8 percent decrease in demand would not change the impacts and mitigation identified in the DEIS for the water and sewer systems. Nevertheless, the Modified North Broadway Project now includes installation of pumps on both fire and domestic water services as needed to augment the pressure and volume to the buildings.

	Proposed		# of		# of		Design
Location	Use	SF	Employees	# of Units	Bedrooms	Flow Rate	Flow (GPD)
	Retail	4,000	-	-	-	0.1 GPD/SF	400
Building 1	Commercial /Office	13,000	87	-	-	15 GPD/Empl.	1,300
	Residential	-	-	300	465	110 GPD/Bdrm.	51,150
	Retail	-	-	-	-	0.1 GPD/SF	-
Building 2	Commercial /Office	-	-	-	-	15 GPD/Empl.	-
	Residential	-	-	350	543	110 GPD/Bdrm.	59,730
						Total	112,580

Table 2-1 Modified North Broadway Project Proposed Sanitary Sewer Flow Rate

area.

Sources: Flow rates based on "NYSDEC Design Standards for Intermediate Sized Wastewater Treatment Systems," dated March 5, 2014.

> Table 2-2 shows the water service fee per billing cycle associated with the Modified North Broadway Project. Table 2-3 shows the sewer service fee per billing cycle associated the Modified North Broadway Project. Both tables reflect the most recent service fees adopted by the City, which have increased since the time the DEIS was published.

Table 2-2

Modified North Broadway Project Water Service Fees

			<u> </u>				
Building	Water Usage (GPD)	Water Usage (cf/day)	Water Usage Per Cycle (cf/day)	Water Service Fee Per Cycle			
Building 1	52,850	7,065	1,271,700	\$57,354			
Building 2	59,730	7,985	1,437,300	\$64,822			
Total	112,580	15,050	2,709,000	\$122,176			
Notes: GPD = gallons per day, cf/day = cubic feet per day							
Sources: Calculations were prepared using information provided on the Yonkers website at							
https://www.vonkers	nv.gov/live/taxes-wa	ter/water-bills.					

Table 2-3

Modified North Broadway Project Sewer Service Fees

Building	Sewer Usage (GPD)	Sewer Usage (cf/day)	Sewer Usage Per Cycle (cf/day)	Sewer Service Fee Per Cycle			
Building 1	52,850	7,065	1,271,700	\$14,879			
Building 2	59,730	7,985	1,437,300	\$16,816			
Total	112,580	15,050	2,709,000	\$31,695			
	Notes: GPD = gallons per day, cf/day = cubic feet per day Sources: Calculations were prepared using information provided on the Yonkers website at						

https://www.yonkersny.gov/live/taxes-water/water-bills.

B.7.b. Sanitary and Storm Sewer Monitoring

As discussed in the DEIS, the Applicant's engineer performed flow monitoring of the combined and stormwater sewers at locations identified by the City's Engineering Department in order to confirm the mitigation measures identified in the DEIS and to appropriately size and new, larger, pipes that may be required. The results of this flow monitoring are presented in **Appendix E**. As presented therein, the mitigation measures described in the DEIS (i.e., replacement of the combined sewers within portions of Buena Vista Avenue, Locust Hill Avenue) were confirmed. The combined sewer in John Street will have stormwater from the Chicken Island Site removed and was shown to have capacity. The sewer in James Street will require repair, as indicated below. Based on the flow monitoring results, additional mitigation was identified, consisting of replacement of the 24-inch diameter pipe at Ann Street that discharges stormwater to the Saw Mill River with a larger diameter pipe. In addition, the Modified Chicken Island Project will also have to detain on site, or provide a second discharge point for, stormwater. Finally, a section of pipe at the intersection of James Street and Palisade Avenue appears to be back pitched and will need to be repaired. Additional mitigation may be identified by the video inspection program, as described below.

In addition to replacement of the sewer mains identified above, and as described in the DEIS, the Applicant would also mitigate inflow and infiltration (I&I) of stormwater and groundwater into the sewer system at a ratio of three-to-one. This mitigation would be accomplished by a combination of relining lengths of existing sewers and payment to the City of a fee in lieu of improvements in the amount of the cost of any required I&I work not being performed by the Applicant. To identify areas of the sewer system that may require relining, a video inspection program of the surrounding collection sewers was developed with the City's Engineering Department and is underway. The results of the TV inspection will be utilized to identify specific sections of pipe that may need to be repaired (e.g., re-lined) based on current conditions of the sewer infrastructure. Following completion of the inspection, the Applicant and the City's Engineering Department would review the reports and identify the precise scope of the required I&I mitigation for the Revised Proposed Project. The TV inspection program may also identify sections of pipe that are currently structurally deficient and which must be replaced.

B.8. STORMWATER MANAGEMENT

The Revised Proposed Project would not change the impacts associated with stormwater management at the Teutonia Site from what was described in the DEIS.

Additional separation of stormwater flows from the combined sewer system has been incorporated for the Modified Chicken Island Project. On the Chicken Island Site, approximately 2.70 acres currently drain to the combined sewer system that connects to the trunk line in Palisade Avenue (POA-A in the Stormwater Pollution Prevention Plan ["SWPPP"] included as FEIS **Appendix F-1**). Under post development conditions approximately 2.26 of those 2.70 acres would no longer drain to the combined system and would be routed to a new storm sewer system that discharges into the Saw Mill River (POA-B in the SWPPP). The reductions for POA-A for the 1, 10 and 100-year storms are 82% flow reduction (5.75 cubic feet per second [cfs] to 1.05 cfs), 83% (11.30 cfs to 1.96 cfs) and 83% (20.04 cfs to 3.37 cfs), respectively (see **Table 2-4A**). The majority of stormwater runoff not being separated from the combined sewer comes from the sidewalk along Palisade Avenue and the entire right-of-way along the northern section of James Street, which is too low to connect back to the existing outfalls at the Saw Mill River near Ann Street.

With respect to the North Broadway Site, removal of the retail building and stair components of the Modified North Broadway Project would result in slight changes to the stormwater flowpaths from what was presented in the DEIS. A Revised North Broadway Stormwater Pollution Prevention Plan was prepared and is included as **Appendix F-2**.

The pre- and post-development peak discharge flow rates for the Modified North Broadway Project are presented in **Table 2-4B** below. The revised drainage area maps and hydrograph calculations for the Modified North Broadway Project are included in **Appendix F-2**. As demonstrated therein, the Modified North Broadway Project would continue to reduce the peak flows into the North Broadway storm sewer and Locust Hill Avenue combined sewer from the existing condition in the 1-, 10-, and 100-year modeled storms.

Table 2-4A

Modified Chicken Island Site Pre- vs Post-Development Peak Discharge Flow Rates Comparison

	POA-A (combined sewer)	POA-B (Saw Mill River)	Total
1-year (cfs)	· · · ·	· · · · · · · · · · · ·	
Pre-Development	5.75	8.57	14.32
Post-Development	1.05	7.98	9.27
Reduction	82%	7%	35%
10-year (cfs)		·	·
Pre-Development	11.30	16.64	27.94
Post-Development	1.96	16.29	18.70
Reduction	83%	2%	33%
100-year (cfs)		·	·
Pre-Development	20.04	29.32	49.36
Post-Development	3.37	28.40	32.53
Reduction	83%	3%	34%
Note: cfs = cubic feet per Source: PSS Engineering	second	570	0470

Table 2-4B

Modified North Broadway Site Pre- vs Post-Development Peak Discharge Flow Rates Comparison

	POA-A	POA-B	
	(North Broadway storm sewer)	(Locust Hill combined sewer)	Total
1-year (cfs)	•		
Pre-Development	1.62	1.87	3.49
Post-Development	0.29	1.84	2.13
Reduction	82%	2%	39%
10-year (cfs)	·	·	
Pre-Development	3.88	3.84	7.72
Post-Development	0.55	3.64	4.14
Reduction	86%	5%	46%
100-year (cfs)	·	·	
Pre-Development	7.64	6.97	14.60
Post-Development	0.97	6.88	7.85
Reduction	87%	1%	46%
Note: cfs = cubic feet	per second		
Source: PSS Enginee	ring; Appendix F-2		

B.9. ENERGY USAGE

The Revised Proposed Project would not change the impacts associated with energy usage of the Teutonia Project or Chicken Island Project from what was described in the DEIS.

With respect to the Modified North Broadway Project, removal of the retail building and stair components would result in a *de minimis* reduction in the electric and gas loads and would not materially affect the impacts or mitigation described in the DEIS.

B.10. TRAFFIC AND TRANSPORTATION

The Modified Teutonia Project and Modified Chicken Island Project would not have different traffic, transportation, or parking impacts than described in the DEIS.

With respect to the Modified North Broadway Project, removal of the retail building and stair components would result in a *de minimis* reduction in the peak hour vehicular trip generation and a small reduction in the number of off-street parking spaces required. These slight reductions in impacts would not materially affect the mitigation described in the DEIS.

As discussed in the DEIS, the Applicant would pay a "fair share traffic mitigation fee" to the City based on the number of dwelling units constructed. This fee would be used by the City to implement certain traffic mitigation measures determined by the City to be appropriate to mitigate any potential impacts resulting generally from redevelopment by the Applicant and others of the downtown core. Subsequent to the DEIS, the City determined that the fee would be \$650 per dwelling unit payable at the time Certificates of Occupancy for the Revised Proposed Projects buildings are issued by the City.

B.11. AIR QUALITY

The Revised Proposed Project would not materially change the impacts associated with air quality from what was described in the DEIS.

B.12. NOISE

The Revised Proposed Project would not materially change the impacts associated with noise from what was described in the DEIS.

B.13. HAZARDOUS MATERIALS

The Revised Proposed Project would not materially change the impacts associated with hazardous materials from what was described in the DEIS. The Revised Proposed Project would not disturb the two parcels that were removed from the North Broadway Site and, therefore, no potential impacts from hazardous materials at those sites would occur as a result of the Revised Proposed Project.

B.14. CONSTRUCTION

The Revised Proposed Project would be constructed in the same manner, and in the same conceptual phases, as the original Proposed Project considered in the DEIS.

B.14.a. Revised Manpower and Transit Estimates

In response to comments on the DEIS regarding estimates of required construction manpower and the estimated percentage of the construction

workforce arriving via mass transit, a more detailed evaluation of the anticipated manpower per construction phase was conducted. The Applicant's proposed construction manager (Hudson Meridian Construction Group) (the "Construction Manager") maintains daily manpower reports for all projects. The revised manpower estimates were based on Hudson Meridian's historic manpower information from projects of similar size, geographic location, and construction typology (587 Main Street, New Rochelle and Larkin Plaza 16 Nepperhan Street, Yonkers). These historical data were used to estimate possible manpower requirements for the AMS Projects The periods of lowest manpower occur when fewest trades are on site, whereas the periods of highest manpower occur when highest number of trades are on site. The peak manpower for the Revised Proposed Project was derived by overlapping the timelines of the various proposed phases of construction of the Revised Proposed Project and the trades that would be active at those times. The revised estimates take into account actual active trades in the various phases rather than combining blanket maximum manpower numbers that are not tied to an actual timeline, which is how the DEIS figure was estimated. Based on the revised estimates, it is anticipated that during the period of maximum construction overlap between Project Sites, at most 520 construction workers would be present at one time across the three Project Sites (see Figure 2-2 and Appendix H-3).

B.14.b. Revised Construction Worker Parking Plans

In order to reduce the number of construction worker vehicles that would travel to and from a site, the Applicant's construction manager would offer financial incentives for subcontractors to utilize carpools, vans and public transportation. The incentives would be included in all subcontracts and would include financial reimbursement. All subcontractors would be directed to advise their labor force of any incentives issued for carpooling and mass transit use. The labor force will be reminded of these incentives via on-site signage at the entry gates. This would minimize the number of single-occupancy vehicles and, therefore, minimize the amount of construction-generated traffic and the number of construction vehicles that must be parked. In response to comments on the DEIS, which had estimated that 75 percent of workers would arrive by mass transit or car/vanpool, the revised construction analysis assumes that 25 percent of workers would arrive by mass transit or by car/vanpool. While this percentage would fluctuate during the construction process, periods of peak activity would be likely to have the highest levels of carpooling and van usage as those are periods of highest trade activity. Based on this assumption, approximately 390 construction worker vehicles would travel to and from the Project Sites during peak construction worker demand.

To avoid and minimize impacts to on-street parking and traffic and transportation, the Applicant would not permit construction worker parking at the Teutonia Site or North Broadway Site until the on-site parking garages are complete and allowed to be utilized. Workers would have to arrive by shuttle bus from the Chicken Island Site and from the other parking areas described below.

The Chicken Island Site would be used as a satellite parking facility with shuttles running to the Teutonia Site and North Broadway Site. Valet parking would be utilized, which would provide a capacity of approximately 592 vehicles (see

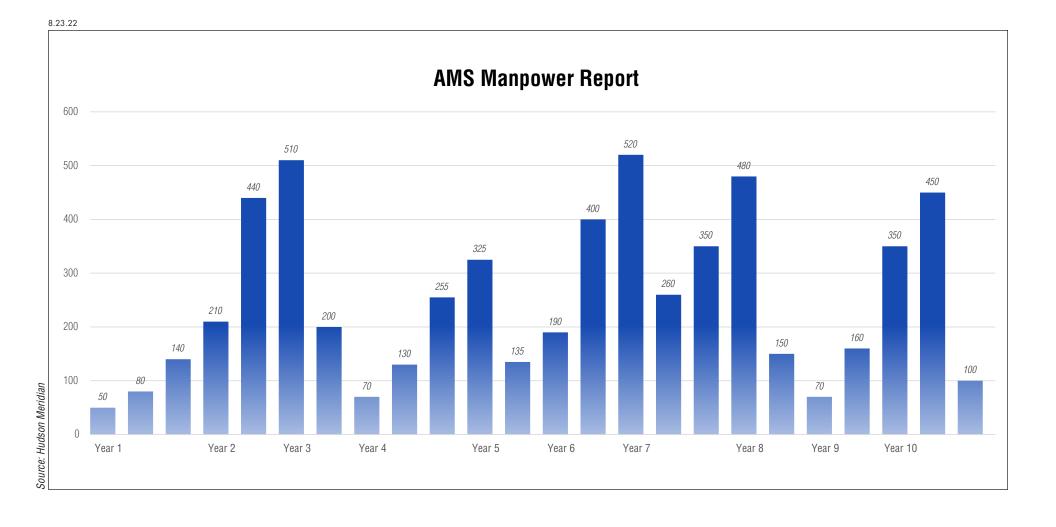


Figure 2-3). After Phase 1 of the Chicken Island Project is complete, the lots would have a capacity of approximately 415 vehicles (see **Figure 2-4**). The Chicken Island Site may also be used for the temporary staging of construction trucks during the day and/or construction materials, which would reduce the availability of parking during certain times. To make up any potential resulting shortfall in parking on the Chicken Island Site, the Applicant would utilize the other sources of off-street parking described below.

First, as parking garages on the Project Sites become usable for construction worker parking, they would be utilized, as the City permitted at the recently completed Sawyer Place development through the issuance of a temporary partial certificate of occupancy.

Second, the City has indicated that it would be able to provide a minimum of 100 spaces for construction worker parking in the Government Center Garage, adjacent to the Chicken Island Site. This is consistent with the City's intent to relocate City staff parking from the Government Center garage to a newly constructed Cacace Justice Center garage, which would increase the availability of spaces within the Government Center garage. The Applicant would coordinate the number of parking spaces needed, the timing of the spaces needed, and the duration of such need as the construction process progresses.

Third, the Applicant previously received approval from the ShopRite facility (in between the Teutonia and Chicken Island Sites) to park up to 100 spots in their garage on a temporary basis. However, the Applicant is not currently utilizing these spaces. Therefore, if needed, the Applicant would seek similar approval for construction worker parking for the Proposed Project without affecting the availability of spaces for 86 Main Street.

Given the number of surface parking spaces available at the Chicken Island Site, the newly constructed on-site parking garages, and the availability of off-site spaces proximate to the Project Sites, sufficient off-street parking for construction workers has been identified.

B.14.c. Revised Analysis of Construction Worker Traffic

In response to comments about how construction worker vehicular traffic may impact the time by which the identified traffic mitigation measures would need to be implemented, the Applicant conducted an analysis that combined peak hour construction worker trips with peak hour project-generated (or, operational) trips.

Table 2-5 provides the assumptions applied to the construction manpower estimates to develop passenger car trip estimates. Delivery trucks were assumed to arrive and depart during off-peak hours. While delivery trucks could arrive or depart during peak hours, this would likely be a nominal amount of truck trips as the majority of deliveries would occur during the off peak hours of the day and would not change the construction analysis findings. Similarly, the construction worker shuttle bus trips (i.e., maximum of 31 round-trips in a peak hour on the busiest construction day assuming 15 persons per bus and no workers staying on Chicken Island) were not considered as they would be nominal compared to existing and proposed project trips. Further, as Chicken Island Stage 1 would be constructed during Phase 1 of the Project, the number of shuttle trips would be





considerably less during this time as a large proportion of workers would remain on the Chicken Island Site.

	Estimate Assumptions
Modal Splits	
Passenger Car	75%
Transit, carpool, or vanpool	25%
Passenger Car Vehicle Occupancy	1 passenger/vehicles
Percent Tips Occurring during Peak Hour	90%

 Table 2-5

 Peak Hour Construction Trip Estimate Assumptions

Table 2-6 presents the trip estimates for the first five years of construction, which includes portions of the Modified Chicken Island Project and Modified Teutonia Project constructed and occupied. As illustrated, at the beginning of construction year 3, Phase 1 traffic mitigations identified in Table 11-30 of the DEIS, which includes signalizing the Waverly Street / Nepperhan Avenue intersection, may be warranted. During the tail end of Year 4, the Phase 2 traffic mitigations may be warranted, which generally consist of signal retiming, restriping, and bus stop relocations. Subsequent construction years will be evaluated as part of the post-implementation monitoring to determine if later phase mitigations need to be implemented earlier in the project's construction timeline based on field measured trip generation volumes.

B.14.d. Revised Construction Truck Routing Plans

Potential construction truck routes, as well as staging and unloading locations, were further evaluated for this FEIS. Revised Construction Site Logistics Diagrams and construction truck routing figures have been provided (**Appendix H-2**). The truck routing figures illustrate, conceptually, where trucks would stage and unload for each Project Site. Also shown, conceptually, is the extent of lane closures in front of the Project Sites. As part of Site Plan review and prior to construction, the Construction Site Logistics Diagrams would be finalized and would include the specific measures required to mitigate impacts from loading and unloading, including requirements for traffic control, time constraints and delivery hours of operations.

				C	onst	ructi	on and	a Ope	eratio	nırı	p Esti	mate
Year/Phase-Stage	Yr-01 / Ph-01 - St-01	Yr-01 / Ph-01 - St-02	Yr-01 / Ph-01 - St-03	Yr-02 / Ph-01 - St-04	Yr-02 / Ph-01 - St-05	Yr-03 / Ph-01 - St-06 & Ph-02 - St-01	Yr-03 / Ph-01 - St-07 & Ph-02 - St-02	Yr-04 / Ph-02 - St-03	Yr-04 / Ph-02 - St-04	Yr-04 / Ph-02 - St-05 & Ph-03 - St-01	Yr-05 / Ph-02 - St-06 & Ph-03 - St-02	Yr-05 / Ph-02 - St-07 & Ph-03 - St-03
	AM Pea	ak Hour	Trip E	stimat	es (i.e.,	7:00-8	:00 AM)					
Man Power	50	80	140	210	440	510	200	70	130	255	325	135
Construction Trips Peak Hour	34	54	95	142	297	344	135	47	88	172	219	91
Operational Trips	0	0	0	0	0	0	0	313	313	313	313	313
Modified Chicken Island Project								191	191	191	191	191
Modified Teutonia Project								122	122	122	122	122
Modified North Broadway Project								0	0	0	0	0
TOTAL AM PEAK HOUR TRIPS	34	54	95	142	297	344	135	360	401	485	532	404
	PM Pea	ak Hour	Trip E	Estimat	es (i.e.,	5:00-6	:00 PM)					
Man Power	50	80	140	210	440	510	200	70	130	255	325	135
Construction Trips Peak Hour	34	54	95	142	297	344	135	47	88	172	219	91
Operational Trips	0	0	0	0	0	0	0	457	457	457	457	457
Modified Chicken Island Project								281	281	281	281	281
Modified Teutonia Project								176	176	176	176	176
Modified North Broadway Project								0	0	0	0	0
TOTAL PM PEAK HOUR TRIPS	34	54	95	142	297	344	135	504	545	629	676	548

Table 2-6

Bold and shaded indicates trips exceed mitigation volume threshold for Phase 2 Mitigations

B.15. SUSTAINABILITY

The Revised Proposed Project expand on the sustainability measures of the Teutonia Project, Chicken Island Project, and North Broadway Project described in the DEIS. The Applicant would provide a minimum of 5 percent electric vehicle charging stations in each garage at each Project Site. In addition, each building would include a white roof, which would help to reduce energy use through reduced cooling costs.

B.16. ALTERNATIVES

There are no changes to the alternatives studied in the DEIS.

B.17. MITIGATION

The table listing the proposed mitigation for each impact category studied in the DEIS and FEIS has been updated based on the Revised Proposed Project (see **Table 2-7**). Mitigation measures newly included in the Revised Proposed Project are listed in **bold**.

		Mitigation
Chapter/Impact Category	Proposed Mitigation	Responsible Entity/Agency
2 / Land Use and Zoning	The Revised Proposed Project would not result in significant adverse effects with respect to land use, zoning and/or public policy. Therefore, no mitigation measures are required.	
2 / Public Policy: New York State Coastal Management Program – Local Waterfront Revitalization Plan/Policy #7	1. The Modified Teutonia Project incorporates bird-safe glass, limited indoor and outdoor lighting, and flashing white rooftop obstruction lighting to reduce the potential for bird collision.	City of Yonkers Planning Board
3 / Visual and Community Character: Community Character and Visual Resources	 The Revised Proposed Project would not result in a significant adverse visual impact; No mitigation measures are required. However, 1. Buena Vista sidewalk widened from Prospect Street to Main Street. 2. Façade of Modified Teutonia Project podium to emulate the former Teutonia Hall façade. 	City of Yonkers Planning Board
3 / Visual and Community Character: Shadows	Applicant would consult with the Mt. Carmel Baptist Church to offset impacts of incremental shadows to the stained glass windows. Measures to be explored include cleaning of the interior/exterior of the windows or of any protective covering if present; replacement of any protective covering if present with a more translucent material; and installation of artificial lighting, which could simulate the effect of direct sunlight on the stained-glass windows. 1. The Applicant would work with MNR to evaluate its specific concerns related to shadowing of the right-of-way as site and building design progresses.	If necessary, Coordination with the NYS OPRHP City of Yonkers Planning Board
3 / Visual and Community Character: Wind	 Landscaping, wind screens, and canopies would be used to mitigate wind speeds within the vicinity of the Modified Chicken Island Project and Modified North Broadway Project. Recessing the Modified Teutonia Project's north residential entrance and the affected entrances for the Modified Chicken Island Project and Modified North Broadway Project by at least five feet would result in wind speeds comfortable for the intended use. Mitigation options to achieve lower wind speeds at localized areas on the Modified Teutonia Project terraces include the addition of trellises, wind screens, or landscaping. Additional wind evaluations may be conducted as building designs are finalized during the Site Plan review process, with a focus on the pedestrian environment immediately proximate to the proposed buildings. The Applicant will coordinate with the adjacent Queens Daughters daycare to incorporate appropriate wind control measures, such as canopies and trellises. 	City of Yonkers Planning Board (Site Plan Review)
4 / Cultural Resources: Archaeological Resources	 The Revised Proposed Project would not result in significant adverse impacts to archeological resources; therefore, no mitigation measures are required. However, for Chicken Island: The Applicant would prepare an Unanticipated Discoveries Plan, which would describe the procedures to be implemented in the event that significant unanticipated archaeological resources are encountered during construction. 	NYS OPRHP City of Yonkers Planning Board

		Mitigation
Chapter/Impact Category	Proposed Mitigation	Responsible Entity/Agency
4 / Cultural Resources: Historic Resources	 Teutonia Site:. 1. The Buena Vista Avenue façade of the former Teutonia Hall was dismantled and palletized by the Site's previous owner, and was subsequently inventoried and moved off site to a storage facility. Although Teutonia Hall was demolished by an unrelated prior owner of the Teutonia Hall Site, the Applicant would emulate the former Teutonia Hall façade on the building's podium, including reuse of certain original materials and recreation of others as partial mitigation for the prior demolition. Chicken Island Site: 2. Mt. Carmel Baptist Church at 175 Nepperhan Avenue is in proximity to the Chicken Island Site. A Construction Management Plan (CMP) would be developed and implemented by the Applicant to avoid inadvertent construction-related impacts. 3. Applicant to consult with Mt. Carmel Baptist church to offset impacts of incremental shadows to the stained glass windows. 4. The Applicant would prepare an Unanticipated Discoveries Plan for the Chicken Island Site, which would describe the procedures to be implemented in the event that significant unanticipated archaeological resources are encountered during construction. North Broadway Site: 5. Four lots of the Modified North Broadway Site are within the Yonkers Downtown Historic District. One of the lots—50 North Broadway (Tax Lot 67)—is identified by OPRHP as contributing to the significance of the historic district but are proposed to be demolished. Demolition of this S/NR-eligible contributing property would constitute an adverse impact on historic resources under Section 14.09 of the New York State Historic Preservation Act (SHPA). Therefore, the Applicant would prepare an "Alternatives Analysis" to evaluate whether given the objectives of the Modified North Broadway Project, there are any feasible and prudent alternatives to demolishing the building, and would develop mitigation measures in consultation with OPRHP, which would be set forth in a Letter of Resolution to be exec	NYS OPRHP City of Yonkers Landmarks Preservation Board City of Yonkers Planning Board
5 / Geology, Soils, and Topography	 A Soil Erosion and Sediment Control Plan (SESC) Plan would be implemented to mitigate potential soil erosion impacts during construction (DEIS Chapter 15, "Construction," summarizes the measures that would be implemented). Additional mitigation measures would be implemented in connection with disturbances to soils in areas that are subject to State Brownfield Cleanup Program requirements (see DEIS Chapter 14, "Hazardous Materials"). 	NYSDEC City of Yonkers Planning Board City of Yonkers Department of Engineering

		Mitigation
Chapter/Impact Category	Proposed Mitigation	Responsible Entity/Agency
6 / Socioeconomic, Fiscal Impacts, and Environmental Justice	 The Revised Proposed Project's residential socioeconomic and market influence mirrors ongoing trends toward higher rents and incomes, possibly contributing to displacement pressures. The Revised Proposed Project would provide the City's required affordable housing and/or contribution toward provision of affordable housing. As there would not be disproportionate significant adverse effects on minority or low-income populations, no environmental justice concerns associated with the Revised Proposed Project, and no mitigation measures are required. 1. Existing commercial tenants at the Project Sites in good standing would be offered space in the Revised Proposed Project at market rate rents. 2. The Applicant would provide relocation assistance for displaced commercial and residential tenants and up to \$5,000 per displaced residential unit in financial assistance to offset relocation costs. 	City of Yonkers Planning Board City of Yonkers Department of Planning & Development
7 / Community Facilities: Financial Costs of City Services		
7 / Community Facilities: Police Protection	Revised Proposed Project would not result in a significant adverse visual; No mitigation measures are required.	
7 / Community Facilities: Fire Protection	Revised Proposed Project would not result in a significant adverse impact; No mitigation measures are required.	
7 / Community Facilities: Emergency Medical Services	Revised Proposed Project would not result in a significant adverse impact; No mitigation measures are required.	
7 / Community Facilities: Public Schools	Revised Proposed Project would not result in a significant adverse impact; No mitigation measures are required.	
7 / Community Facilities: Parks, Recreation, and Open Space	Revised Proposed Project would not result in a significant adverse impact; No mitigation measures are required.	
7 / Community Facilities: Solid Waste and Recycling	Revised Proposed Project would not result in a significant adverse impact; No mitigation measures are required.	
8 / Infrastructure and Utilities: Water Supply	 Teutonia Site: Extend the existing 12-inch water main starting at the intersection of Prospect Street and Hawthorne Avenue to the Teutonia Site. Pumps on both fire and domestic water services would be installed as needed to augment the pressure and volume to the buildings. New fire hydrants and valves would be installed as specified and located by the Yonkers Water Bureau. Chicken Island Site: 	City of Yonkers Department of Engineering, Water, Public Works City of Yonkers Planning Board

Table 2-7 (cont'd) Mitigation

	Responsible Entity/Agency
4. Upgrade the water main in James Street, currently a 6-inch ductile iron pipe (DIP), to an 8-inch	
DIP to complete the overall water service loop that is proposed to be constructed as part of the	
water main in both John Street and James Street.	
5. The existing 8 inch and 6 inch mains in John Street will be properly abandoned at the	
1 U U	
8. Install approximately 2,000 linear feet of new water main in Locust Hill Avenue from Ashburton	
Avenue to Palisade Avenue.	
9. Pumps on both fire and domestic water services would be installed as needed to augment	
the pressure and volume to the buildings.	
10. New fire hydrants and valves would be installed as specified and located by the Yonkers	
	 DIP to complete the overall water service loop that is proposed to be constructed as part of the Modified Chicken Island Project. This upgrade would include the construction of a new 12-inch water main in both John Street and James Street. 5. The existing 8 inch and 6 inch mains in John Street will be properly abandoned at the existing connection to the School Street water main. 6. Pumps on both fire and domestic water services would be installed as needed to augment the pressure and volume to the buildings. 7. New fire hydrants and valves would be installed as specified and located by the Yonkers Water Bureau. North Broadway Site: 8. Install approximately 2,000 linear feet of new water main in Locust Hill Avenue from Ashburton Avenue to Palisade Avenue. 9. Pumps on both fire and domestic water services would be installed as needed to augment

		Mitigation
Chapter/Impact Category	Proposed Mitigation	Responsible Entity/Agency
8 / Infrastructure and Utilities: Sanitary Sewer	 Mitigation measures to address capacity constraints and pipe conditions are anticipated to include replacement and/or upsizing of portions of the combined sewer within Buena Vista Avenue, Locust Hill Avenue, Baldwin Place, James Street, John Street, and New School Street. Flow monitoring program of the surrounding collection sewers, developed with the City's Engineering Department, was completed. TV inspection is underway. For the stormwater flow that would still be connected to the combined sewer system, the detention provided for on-site runoff will provide a measured reduction to overall flows reaching the combined sewer. To further mitigate the increased flow, additional I&I mitigation would be provided at a three-to- one ratio, in accordance with Westchester County policy. This would be accomplished by a combination of relining lengths of existing sewers as directed by the City and payment to the City of a fee in lieu of improvements in the amount of the cost of any required I&I work not being performed by the Applicant, for implementation by the City of other City-wide improvements. Chicken Island Site: The 24-inch diameter pipe at Ann Street that discharges stormwater to the Saw Mill River will be replaced with a larger diameter pipe. To mitigate the increased sanitary sewer flow from the Revised Proposed Project, the Applicant will separate stormwater runoff from the combined sewer system where practical. The stormwater runoff from the Chicken Island Site and from some of the surrounding roadways will be separated from the combined sewer system and would be conveyed to the nearby Saw Mill River, reducing approximately 2.26 acres of drainage area runoff from the combined sewer. North Broadway Site: Any mitigation required for connection to the combined sewer system in Locust Hill Avenue would be further evaluated with the City Engineering	City of Yonkers Planning Board, Department of Engineering
9 / Stormwater Management	 Permanent measures to mitigate impacts to downstream flooding conditions include a detention system at the Teutonia Site, manufactured treatment devices and detention systems at the Chicken Island Site, and a manufactured treatment device and detention system at the North Broadway Site. Additional green infrastructure techniques for stormwater management, including permeable pavement where practicable, would be considered during Site Plan review. 	City of Yonkers Planning Board, Department of Engineering
10 / Energy Usage	The Revised Proposed Project incorporates energy reducing design features that would reduce long-term operational energy use. The Revised Proposed Project would not result in significant adverse impacts. Therefore, no mitigation measures are required.	
11 / Traffic and Transportation	 Mitigation measures to address potential traffic impacts are identified in DEIS Table 11-16 in Chapter 11. 	City of Yonkers Planning Board, Department of Engineering

		Mitigation
Chapter/Impact Category	Proposed Mitigation	Responsible Entity/Agency
	 The Applicant would pay a \$650 per dwelling unit "fair share traffic mitigation fee" in proportional installments at the time a Certificate of Occupancy is issued for a building of the Revised Proposed Project. As to parking, the Revised Proposed Project would not result in a significant adverse impact (the Revised Proposed Project provides sufficient parking to replace lost on- and off-street parking at the Chicken Island and North Broadway Sites) and thus no additional mitigation measures are required. 	New York State Department of Transportation – Region 8
12 / Air Quality	The Revised Proposed Project would not result in potential significant adverse air quality impacts from stationary sources. Traffic generated by the Revised Proposed Project does not exceed NYSDOT's screening criteria, indicating no significant adverse air quality impact from project-generated traffic. Therefore, no mitigation measures are required. Nevertheless, the Revised Proposed Project design incorporates restrictions on exhaust stack placement to locate them away from potential receptors.	City of Yonkers Planning Board
13 / Noise	The Revised Proposed Project would not result in a significant adverse impact from noise. Therefore, no mitigation measures are required.	
14 / Hazardous Materials	Although the potential for subsurface contamination has been identified in some areas of the Teutonia Site and Chicken Island Site, the Revised Proposed Project is not anticipated to result in significant adverse hazardous materials impacts.	NYS DEC City of Yonkers Planning Board
15 / Construction	 The Applicant would revise/finalize the detailed Construction Management Plan (CMP) provided as FEIS Appendix H-1, which would establish construction management protocols and measures to mitigate potential adverse impacts. A Soil Erosion and Sediment Control Plan (SESC) would be implemented to avoid and mitigate potential impacts associated with the off-site migration of sediment during construction. Excavation side walls would be adequately braced to mitigate potential steep slope issues during construction. Steep slopes remaining following construction would be secured with structural methods or would be properly stabilized. Measures would be taken during construction to avoid, minimize, and mitigate potential adverse impacts from subsurface environmental conditions on the Teutonia Site and Chicken Island Site (see DEIS Chapter 14, "Hazardous Materials") and mitigation measures on the Teutonia Site include a vapor barrier and passive sub-slab depressurization system. Construction vehicle emissions will be minimized through: Use of ultra-low sulfur diesel fuel for all on-site construction equipment to late model (1998 and newer) unless otherwise approved by the Commissioner of Building; and All non-road vehicles over 50HP used with regard to the Revised Proposed Project are to utilize the best technology available for reducing the emission of pollutants, including, but not limited to, retrofitting such non-road vehicles with oxidation catalysts, particulate 	City of Yonkers Planning Board, Department of Engineering

		Mitigation
Chapter/Impact Category	Proposed Mitigation	Responsible Entity/Agency
Chapter/Impact Category	 Proposed Mitigation filters, and/or technology with comparable or better effectiveness. All construction equipment will include PM_{2.5} emission controls. Valet parking for construction workers would be provided on the Chicken Island Site and, if needed, at the Government Center garage, ShopRite lot, and the newly built structured parking under the actively being constructed residential towers. Shuttles would take workers to and from the Teutonia Site and North Broadway Site. The Applicant's construction manager will provide incentives for subcontractors to utilize vans and public transportation to minimize the number of parked vehicles. The CMP and Construction Logistics Diagrams will be coordinated with the Yonkers Police Department and the Yonkers Fire Department during Site Plan review. The contractor will work with the City of Yonkers, Yonkers Public Schools (specifically including Martin Luther King, Jr. Academy), and surrounding neighborhood associations to schedule periodic meetings to inform the neighbors of scheduled Project construction and anticipated neighborhood impacts and to solicit input, including on practicable measures to mitigate potential impacts on scheduled community events. The Applicant will provide flagmen as needed during the Queens Daughters Daycare dropoff and pick-up times. The Applicant will require its Construction Manager and all sub-contractors to limit the size of construction trucks for the North Broadway Project Phase 1 and a 50-foot tractor trailer on Overlook Terrace during North Broadway Project Phase 1 and a 50-foot tractor trailer on Overlook Terrace during North Broadway Project Phase 2. The Applicant will require its General Manager and all sub-contractors to limit construction trucks on North Broadway Project Phase 1 and a 50-foot tractor trailer on Overlook Terrace during North Broadway Project Phase 2.	
	onsite security after normal working hours once the building superstructure is underway.	
16 / Sustainability	 The Revised Proposed Project includes sustainability measures that exceed the requirements of the Yonkers Green Development Standards. 1. Each building at each Project Site will include a white roof. 2. The Applicant will provide a minimum of 5 percent electric vehicle charging stations in each garage at each Project Site. 	City of Yonkers Planning Board, Department of Engineering

B.18. GROWTH-INDUCING ASPECTS

The Revised Proposed Project would not materially change the potential growth-inducing impacts of the project from what was described in the DEIS.

B.19. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

The Revised Proposed Project would not materially change the impacts associated with irreversible and irretrievable commitment of resources at the Project Sites from what was described in the DEIS.

B.20. UNAVOIDABLE ADVERSE IMPACTS

The Revised Proposed Project would not result in unavoidable adverse impacts not analyzed in the DEIS.