

2. ALTERNATIVES CONSIDERED

2.1 PURPOSE

As stated in the SEQR Handbook (3rd Edition – 2010²⁷) published by the NYSDEC, the goal of the alternatives discussion in an EIS is to “investigate means to avoid or reduce one or more identified potentially adverse environmental impacts.” The SEQRA implementing regulations (6 NYCRR 617) further require that the alternatives discussion include “a range of reasonable alternatives, which are feasible considering the objectives and capabilities of the project sponsor.”

As previously identified in Section 1, the objectives and capabilities of the project sponsor (MVHS) are as follows:

- Consolidation of multiple, existing, licensed health care facilities into an integrated system of care, within the largest population center in Oneida County (as stated in MVHS’ CON application; see Appendix A). Within its CON application submitted to the NYSDOH, MVHS indicated that the consolidation will result in the following public benefits:
 - » Provision of one integrated location for acute care with greater access to residents of the City of Utica, Oneida County and the region
 - » Improvements to operational efficiency, patient satisfaction, and safety for both patients and caregivers
 - » Creation of a structured delivery system, ending current service fragmentation, and increasing service integration and coordination of work of the hospitals and other community-based organizations
 - » Reduction of gaps/inefficiencies in care coordination, alignment with payment reform and rebalance healthcare delivery through the reduction in the number of hospital beds as care is shifted from an inpatient care model to an outpatient care model focused on population health
- Substantive compliance with the Oneida County Health Care Facility Transformation Program²⁸, a law enacted by the New York State Legislature in 2015, which provides capital funding (\$300 million) “in support of projects located in the largest population center in Oneida County that consolidate multiple licensed health care facilities into an integrated system of care.” (<https://www.nysenate.gov/legislation/laws/PBH/2825-B>) The location and centralization of the project within the central business district of Utica, can become a catalyst for ongoing and future development of the region (see Section 8 – Growth Inducing Aspects).

Additional information regarding the public need for the project is included in the CON application provided as Appendix A.

Consistent with the Final Scoping Document (Appendix C), the following alternatives are evaluated in this section:

- “No action” alternative
- Alternative sites
- Alternative scale/magnitude
- Alternative design
- Alternative timing

²⁷ http://www.dec.ny.gov/docs/permits_ej_operations_pdf/seqrhandbook.pdf

²⁸ New York Public Health Law § 2825-b.

2.2 NO ACTION ALTERNATIVE

In accordance with the SEQRA implementing regulations²⁹, the range of alternatives must include a discussion of the “no action” alternative. The no action alternative discussion evaluates the adverse or beneficial site changes that are likely to occur in the reasonably foreseeable future, in the absence of the proposed action.

The “no action” alternative is included in the DEIS to provide a baseline for evaluation of impacts and comparisons of other impacts (*i.e.*, the likely circumstances at the project site if the project does not proceed). The absence of the proposed action (“no action”) is defined as:

- The likely continuation of existing conditions within the project footprint, which includes existing businesses, as well as underutilized, vacant, dilapidated and unsafe properties
- MVHS’ continued maintenance and operation of existing aged facilities, despite the State-identified public need for consolidation of, and improvements to, regional healthcare and its associated public benefit
- The forfeiture of project-related funding including \$300 million from New York State.

As noted in Section 1, implementation of the project will eliminate the existing operational inefficiencies through the elimination of duplicative and redundant functions between FSLH and SEMC, thereby reducing overall spending. The “no action” alternative is inconsistent with this objective, as well as the additional objectives of MVHS and other stakeholders to provide improved healthcare to the residents of the Mohawk Valley region.

2.2.1 Future Conditions – Downtown Footprint

As indicated in the Phase 1A Architectural Inventory (see Section 3.6), the project site is predominantly characterized by remnant 19th and 20th century buildings vacated during the decline of manufacturing within the City limits. In the late 1950s and 1960s, urban renewal plans led to the demolition of numerous city buildings, which became vacant lots when proposed projects did not materialize. While some of the buildings have been adaptively reused by local businesses, the condition of many other buildings within the project footprint continues to decline due to neglect and vacancy (as illustrated in project photographs; see Appendix E).

Under the “no action” alternative, potential development scenarios range from a continuation of the *status quo* conditions (*i.e.*, continued operation of existing businesses under a no growth scenario and continued deterioration of already vacated and dilapidated buildings and properties) to a maximum build-out scenario consistent with the City’s existing zoning designation (Central Business District, CBD³⁰).

While the no growth scenario would not necessarily result in any direct significant adverse impacts on the environment, it would likely, over time, result in potentially significant adverse socio-economic impacts due to the need for funding to demolish uninhabitable, vacated and/or abandoned buildings; repair neglected infrastructure; and/or remediate impacted sites/buildings.

The maximum build-out scenario would require public and/or private investment resulting in potential growth of existing operations and/or adaptive reuse or replacement of existing, vacated buildings or vacant lots. The maximum build-out scenario would result in environmental and socio-economic impacts similar in type and magnitude to impacts identified as a result of construction and operation of the hospital including:

- Impacts on Land – Clearing and/or excavation on parcels could expose impacted soils requiring removal and off-site management.
- Impact on Surface Water – Potential to encounter and remediate impacted surface water due to past land use, as well as the need to manage stormwater runoff due to potential increases in impervious surfaces.

²⁹ 6 NYCRR § 617.9(b)(5)(v)

³⁰ <https://ecode360.com/14015081?highlight=business,central business district,centralized,district#14015081>

- Impact on Groundwater – Potential to encounter and remediate impacted groundwater due to past land use.
- Impact on Flooding – Potential increase in stormwater runoff, which could exacerbate flood potential during storm events.
- Impact on Air – Construction and operation-related impacts associated with construction or expansion of new businesses (*i.e.*, dust; emissions from construction and operations-related equipment; increase in mobile source emissions due to increased traffic).
- Impact on Aesthetic Resources – Temporary construction-related lighting; changes to viewshed due to modifications to existing buildings, demolition of existing buildings, and construction of new buildings; potential increases in site lighting.
- Impact on Historic and Archaeological Resources – Potential impacts on historic properties and/or archaeological resources due to construction-related ground disturbances or demolition/renovation of existing buildings.
- Impact on Transportation – Increases in traffic due to expansion of existing businesses and/or creation of new businesses; associated increase in demand for parking.
- Impact on Utilities – Improvements/modifications to existing utility infrastructure to support growth.
- Impacts on Noise – Temporary, construction-related noise impacts.
- Impact on Human Health – Disturbance of hazardous building materials during demolition activities (*e.g.*, asbestos, lead, *etc.*); potential to encounter impacted soil/groundwater from past land use.
- Consistency with Community Character and Plans – Potential to replace or eliminate existing facilities, structures, or areas of historic importance to the community; potential inconsistencies of new development with the existing architectural style and character of the area.
- Impacts on Solid Waste Management – Increased waste generation during construction and operations.
- Environmental Justice – Potential displacement of affordable or low-income housing in NYSDEC-designated “Potential Environmental Justice Area.”

2.2.2 Future Conditions – MVHS Facilities

Under the “No Action” alternative, the existing MVHS facilities would not be consolidated to an integrated health campus and would continue to operate and be maintained as they are at present. Under this scenario, the greatest impact would be to the community, which would not benefit from the transformative, positive impacts on regional healthcare as identified in Section 1 of this DEIS, as well as in the public need section of the CON application (see Appendix A). Anticipated benefits and positive impacts included:

- The desire and need to build a facility with the newest technology, services and advancements in patient safety and quality so that our community can receive the most up-to-date healthcare services that rivals those found in large cities
- The growing demand for healthcare due to the rapidly increasing and aging population in this region
- The increasing need to improve accessibility and availability by attracting specialists and providing services that otherwise would not be available to our community
- The opportunity to gain greater operational efficiencies through the elimination of duplicative and redundant functions will help to reduce the rate of increase in healthcare spending and to achieve improved financial stability

2.3 ALTERNATIVE SITES

As described in SEQR guidance materials (*e.g.*, the SEQR Handbook³¹), a discussion of alternative sites is appropriate when:

- A project sponsor has already evaluated alternative sites in developing the proposal for a private action, and desires to include that analysis in the DEIS.
- The suitability of the site for the type of action proposed is a critical issue, in which case a conceptual discussion of siting should be required.

As both those considerations are true for this project, a conceptual discussion of alternative sites is included in this DEIS.

2.3.1 Conceptual Siting Study Approach

A conceptual siting study (Appendix D) was completed in June 2015³², which consisted of the following four steps:

1. **County-wide Site Search** – Geographic Information System (GIS)-based analysis to identify parcels that could potentially host the IHC; twelve locations were identified for initial evaluation.
2. **Level 1 Analysis** – Using the results of the GIS analysis, initial sites were screened in a “funnel” process to identify potential “fatal flaws” (see Section 2.3.3) that warranted sites be eliminated from further consideration (*i.e.*, “go/no go” decision).
3. **Level 2 Analysis** – With the fatal flaws analysis completed, a site selection matrix was created to complete a detailed screening of the top remaining sites.
4. **Capacity Analysis** – In addition to a detailed evaluation using the site selection matrix, a conceptual capacity analysis³³ for the top three sites was prepared, which included identifying areas for hospital operations, hospital expansion areas, parking facilities (surface and structured), medical office building, and patient towers. An initial capacity concept plan was prepared for all 3 sites and two sites (Downtown and NYS Psych Center) were advanced further to consider circulation and functional entrances.

The study relied on previously completed evaluations prepared for MVHS by the Hammes Company³⁴ (Hammes), which identified the preliminary program requirements for hospital operations.³⁵ These requirements consisted of:

- 440 beds proposed (actual reduction of approx. 164 beds for 3 hospitals)
- 884,256 square feet (sf)³⁶
- 40,000 sf Medical Office Building to be programmed as part of development
- Estimated Cost: \$507.7 M or \$527.40/sf

³¹ http://www.dec.ny.gov/docs/permits_ej_operations_pdf/seqrhandbook.pdf

³² MVHS coordinated with Mohawk Valley EDGE (EDGE) to complete a conceptual site analysis for the proposed IHC. EDGE contracted with Elan Planning, Design, & Landscape Architecture, PLLC (Elan) of Saratoga Springs, NY to complete these services. O'Brien & Gere Engineers, Inc. (OBG), from its local office in Utica, provided sub-consulting services to Elan relative to infrastructure and environmental considerations. The work was commissioned in February 2015.

³³ The complete capacity analysis, including concept plan illustrations, is provided in Appendix D.

³⁴ Hammes Company is a healthcare project management firm that provides strategic planning, implementation and development services for capital construction projects such as hospitals.

³⁵ While the project planning/design has progressed since 2015, several of these preliminary program requirements have been adjusted/updated, but not to a degree that would substantially affect the findings of the siting evaluation.

³⁶ Current space in the existing three hospitals encompasses approximately 1.3 million square feet.

- Urban Site Requirements:
 - » 433,250 sf
 - » Total acreage = 10±³⁷
- Suburban Site Requirements:
 - » 1,927,500 sf
 - » Total acreage = 45±³⁸

In addition, sites were evaluated relative to the following key parameters (Hammes 2015):

- **Size** – can the site accommodate MVHS program objectives?
- **Future growth potential** – will the site support future growth and expansion?
- **Accessibility to the region** – Does the location provide better access and will that access support MVHS’ role as a regional tertiary care center³⁹?
- **Patient experience/convenience** – Will a hospital on this site enhance the patient experience, be convenient to MVHS customers (*i.e.*, staff, patients, and clinicians) and enable MVHS to build a modern, healing environment?
- **Cost** – What is the cost premium of the recommended site?

The study findings were summarized in a report, which is included as Appendix D. Additional details for each of the study steps is provided below.

2.3.2 County-wide Site Search⁴⁰

A GIS-based search was performed to identify sites, which were 50-acres and larger (including multiple, contiguous or adjacent parcels) and could potentially host the new IHC. The search process did not account for: site control, current site build-out, or existing or past land uses (and associated impacts).

Parcels meeting the 50-acre threshold were identified and plotted on a base map, which included: county and municipal boundaries, Oneida County property lines (2011), and topographic relief. To illustrate the location of sites relative to the MVHS service areas, the following socio-economic data was overlaid on the “funnel map”:

- MVHS Primary Service Area (PSA)⁴¹
- MVHS Secondary Service Area (SSA)⁴²

³⁷ Urban site assumes vertical building construction constrained by street grid; additional land may be necessary for parking, stormwater management, and support facilities.

³⁸ Suburban site assumes less expensive horizontal construction, not constrained by street grid.

³⁹ A tertiary care center is a hospital that provides tertiary care, which is health care from specialists in a large hospital after referral from primary care and secondary care.

⁴⁰ Although MVHS is a private, not-for-profit healthcare organization, which would typically limit alternative sites to those which the project sponsor owns or has under a purchase option (6 NYCRR § 617.9(b)(5)(v)(g)), the public need for the project, associated support via public funds, and the potential use of eminent domain to acquire property, a County-wide search was conducted. Although MVHS operates in Oneida, Madison and Herkimer Counties, the site search was limited to Oneida County, which was the focus of the Oneida County Health Care Facility Transformation Legislation, approved by the NYS Legislature to consolidate health care services and “support health care facility transformation within the County of Oneida...”

⁴¹ The primary service area is where a majority of MVHS patients originate as determined by patient encounters by zip code.

⁴² The secondary service area is further away from the facility and is typically associated with specific health services (*i.e.*, cardiac, *etc.*).

The following additional radii were overlaid on the funnel map to focus the search by identifying potential sites that might be considered as reasonably central to serve PSA and SSA customers:

- 10-mile radius from the approximate geographic center of Utica
- 5-mile radius from the approximate geographic center of Utica.

Parcels were highlighted on the funnel map, which met the following criteria:

- Parcels ≥ 50 -acres⁴³
- Parcels ≥ 50 -acres within the 10-mile radius and within the PSA
- Parcels ≥ 30 -acres and < 50 -acres within the 10-mile radius and within the PSA (≥ 30 -acre parcels were added to capture additional urban-centric sites)
- Parcels, which substantially meet required geographic parameters, as well as those parcels, which are not characterized by “unfavorable” environmental conditions.

Based on the county-wide search parameters, the following twelve locations, which are illustrated on Figure 4, were identified for additional Level 1 analysis:

1. Yahnundasis Golf Club, Seneca Turnpike, New Hartford, NY
2. Twin Ponds Golf Country Club, Main Street, New York Mills, NY
3. New Hartford Business Park, New Hartford, NY
4. Property adjacent to SUNY Polytechnic Institute, fronting onto Route 12 South, Deerfield, NY
5. Sadaquada Golf Club, Whitesboro, NY
6. Hidden Valley Golf Club, Castle Road, Whitesboro, NY
7. Domenico's Golf Course, Church Road, Whitesboro, NY
8. Downtown - generally bounded by Oriskany Street on the south, Broadway on the east, State St on the west, and City Hall on the north
9. St. Luke's Hospital Campus, New Hartford, NY
10. NYS Psych Center grounds Utica, NY
11. Tect Utica, Whitesboro, NY
12. Faxton Hospital-Murnane Field, Utica, NY.

2.3.3 Level 1 Analysis

The twelve locations were screened in a “funnel” process to identify the potential presence of unfavorable “fatal flaw” characteristics that would warrant a site’s elimination from further consideration. Unfavorable fatal flaw characteristics are existing site conditions, which impact the developable acreage and/or increase development costs and schedule. Fatal flaw characteristics included considerations such as:

- Wetlands (New York State⁴⁴ and potential federal⁴⁵)
- 100-year floodplain
- Steep slopes ($> 15\%$; created using USGS 10m Digital Elevation Models [DEMs])
- Lack of infrastructure (sewer/water)
- Access limitations
- Inadequate transportation network
- Other factors, including challenging permitting needs, that could adversely impact, or create major obstacles to, the development potential of the site as a hospital campus.

⁴³ Including grouping of contiguous or adjacent parcels.

⁴⁴ Based on NYS Freshwater Wetland Maps published by the NYSDEC.

⁴⁵ Based on National Wetland Inventory (NWI) Maps published by the US Fish & Wildlife Service.

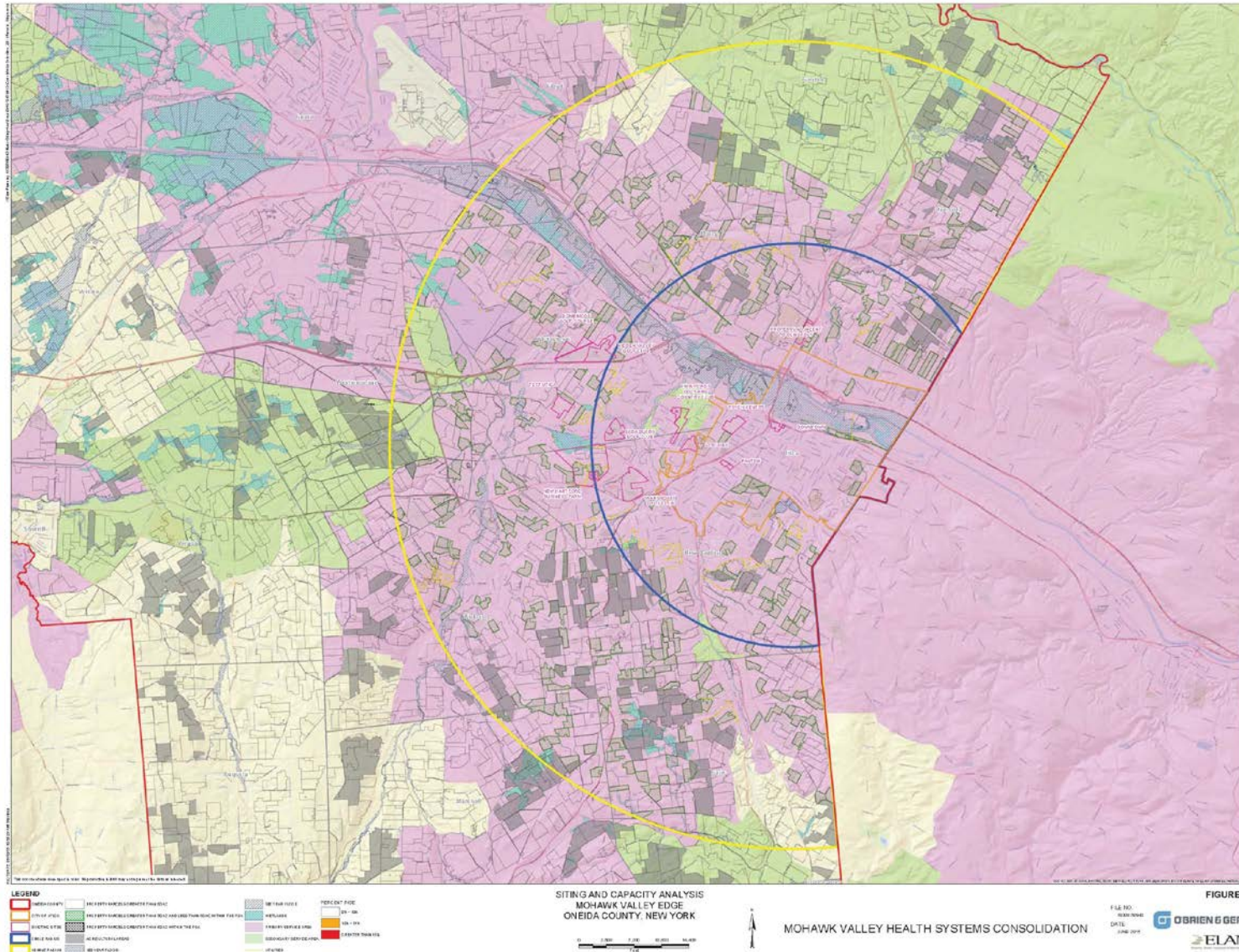


Figure 4. Alternative Locations

Existing web-based GIS resources, as well as input from utility purveyors and the NYSDOT, were relied upon to provide the requisite environmental, topographic, infrastructure and access related data. The analysis resulted in the Level 1 elimination of eight sites as summarized below.

Yahnudasis Golf Club (Eliminated)

- Access issues:
 - » NYSDOT indicates that access would be near the existing entrance from Commercial Drive, but would require a reconfiguration of the NYS Route 12 – Genesee Street/NYS Route 12B/MYS Route 5 intersection
 - » The road network has the capacity, but there are potential operational issues with restrictions on the number of options for ingress/egress
 - » There is a railroad spur that would need to be crossed, but it has extremely limited use
 - » Secondary access from NYS Route 840, NYS Route 12 or Commercial Drive is not feasible
- High tension power lines are present
- Mud Creek with associated wetlands impacts a large portion of the golf course site
- Site is located outside the major population center as required in the 2015-2016 NYS budget legislation

Twin Ponds (Eliminated)

- Adjacent to older well-established neighborhoods
- New York Mills planning and permitting process
- Generally hilly site
- Twin Ponds is a 1950's icon – with some associated history
- Access Issues:
 - » Main Street and Burrstone Road have capacity issue; three-legged intersection with rail crossing at Main Street, Burrstone Road and Clinton Street creates circulation issues
 - » A secondary access from Burrstone Road would require residential property acquisition; capacity concerns about access from Burrstone Road
- No assessment has been made of utility and infrastructure capability and whether additional upgrades would be necessary to serve a hospital use
- Site is located outside the major population center as required in the 2015-2016 NYS budget legislation.

New Hartford Business Park (Eliminated)

- Access issues:
 - » Operational issues along approach at “Jay – K intersection”
 - » Capacity and operational issues along Middle Settlement Road
 - » Woods Highway at NYS Route 5 is not a feasible main entrance
 - » Creating interchange at NYS Route 840 to allow westbound access to the site would be at a cost of \$20 to \$30 million
- Power lines cut through site, which reduces available acreage
- Site is located outside the major population center as required in the 2015-2016 NYS budget legislation.
- Deerfield Property (SUNY Poly and Route 12 South) (Eliminated)

- North of NYS Thruway – further from population centroid
- Along a divided highway; traffic from south, west or east would need to travel north on NYS Route 12 and take exit ramp at Mulaney Road to then travel south to enter site
- Only known access to site is through access road off Mulaney Road that extends from Bank of America to site; not clear if access could be provided off service road parallel to NYS Route 12 or through SUNY Poly
- Highest and best use of site is for expansion of the State University of New York (SUNY) Polytechnic Institute
- Improvements would be required to bring power to the site
- No ability to expand site as site is landlocked by NYS Route 12 to east, Bank of America to the north, and SUNY Poly to west and south
- Site is located outside the major population center as required in the 2015-2016 NYS budget legislation.

Sadaquada Golf Club (Eliminated)

- Access issues:
 - » Henderson Street has operational and capacity issues
 - » Approach would be along Commercial Drive which has the highest traffic volumes in the region
 - » Clinton Street and Clark Mills Road also have capacity issues
- Utility and infrastructure availability and capacity not assessed
- Site is located outside the major population center as required in the 2015-2016 NYS budget legislation.

Hidden Valley and Domeninco's Golf Course Sites (Eliminated)

- Remote site
- Access issues:
 - » North Side of NYS Thruway – further from population centroid
 - » Access north on NYS Route 840 past Westmoreland Road
 - » Lack of secondary access points
- Power lines cut through the site
- No infrastructure at site
- Site is located outside the major population center as required in the 2015-2016 NYS budget legislation.

Tect Utica Site (Eliminated)

- Remote site
- Access issues:
 - » Halsey Road has capacity issues
 - » Clark Mills Road has capacity issues
- Potential wetlands
- Power lines
- Infrastructure upgrades needed – sewer upgrade
- Tect Utica may not be compatible – vibrations and noise
- Site is located outside the major population center as required in the 2015-2016 NYS budget legislation.

Faxton Hospital – Murnane Field (Eliminated)

- Alienation of park lands required with replacement of Murnane Field
- City of Utica School District approval required to acquire Murnane Field
- Access issues:
 - » No access from Burrstone Road
 - » Burrstone Road and Sunset Avenue have existing capacity issues, which would be compounded with development on Murnane and potentially Pin-O-Rama sites
 - » Additional property acquisition would be required – Pin-O-Rama Block
- Site would require overhead connector with Faxton from Murnane
- Would need to consider integration of Faxton campus with new hospital complex to determine whether there is value in maintaining Faxton site and using property at Murnane Field and Pin-O-Rama for expansion.

2.3.4 Level 1 Analysis Findings

Based on the Level 1 analysis, the following sites were advanced to the Level 2 analysis:

- Downtown
- St. Luke’s Hospital Campus
- NYS Psych Center

2.3.5 Level 2 Analysis

With the fatal flaw analysis completed, a weighted site selection matrix was created to complete a more detailed screening of the three remaining sites. The matrix format was used to examine a variety of factors necessary for a successful and functioning site that would meet current and future hospital needs. A comparative analysis of the three remaining sites was completed using the seven evaluation categories listed below:

- **Size** – Size evaluation was based on the programming guidelines set forth by Hammes and adjusting for urban and suburban environments
- **Utilities** – The availability and capacity of water, sewer, stormwater, electrical, natural gas, and fiber line utilities were evaluated under this category
- **Accessibility** – Accessibility was reviewed both from the distance to NYS routes and the NYS Thruway
- **Zoning Approvals and Impact Fees** – Basic zoning was reviewed for each site (allowed use, lot coverage, and height requirements, *etc.*) along with fee requirements (sewer use offsets, stormwater mitigation fees, *etc.*)
- **Monetary Factors** – Both cost prohibitive factors (site assemblage, construction phasing, *etc.*) and cost incentive factors (State investment, shared facilities, *etc.*) were evaluated under this category
- **Community Factors, Perception & Sustainability** – existing community policy documents, potential impact on neighborhoods, and sustainability features were reviewed
- **Environmental** – factors evaluated under this category included: 100-year floodplain, cultural resources, wetlands, steep slopes (amount of land with less than 15% slope), and endangered and threatened species.

Criteria and sub-criteria were established for each category. Each sub-criterion was assigned points with the higher values representing more desirable features or development conditions. However, the Level 2 analysis did not weight any of the criteria and sub-criteria based on the Oneida County Health Care Facility Transformation Program found in Section 2825 of the New York State Public Health Law. Rather, all Level 2 sites were deemed equal with regard to their status in terms of the legislation. The findings of the Level 2 analysis are provided below; the complete evaluation is provided in Appendix D.

Size

Size evaluation was based on the programming guidelines set forth by Hammes (Hammes 2015), which were adjusted for urban and suburban environments. The Hammes report established a minimum lot size of 11 acres for an urban location and 49 acres for a suburban location. The points assigned in this section are based on current available acres for development. Scoring results under the Size category are as follows:

- Downtown – 7 points
- St. Luke’s Hospital Campus – 7 points
- NYS Psych Center – 10 points

Utilities

Water, sewer, stormwater, electrical, natural gas, and fiber line utilities were evaluated under this category. Water capacity is sufficient at all three sites. However, static pressures at the Psychiatric Center (approximately 60-70 psi) are less than the static pressures at the other two sites (approximately 90 psi). The Downtown location is also surrounded by older infrastructure that has experienced frequent water main breaks during deep winter frosts. All three sites have good redundancy.

Sanitary and storm sewers are not separated at the Downtown site and the site is not conducive to green infrastructure features. A sewer separation project would need to be planned in advance of hospital construction at this location. The sewer improvement project would need to eliminate stormwater inflow from the combined sewers in this area. Stormwater lines would need to be constructed to separate stormwater flow and direct it under the main rail lines to the north and then to the canal.

None of the sites are in the “downtown electrical network,” which would likely prohibit the development of a Combined Heat and Power facility (CHP). Natural gas is likely available near each site at the appropriate capacity for a gas turbine CHP system. However, the level of system improvements necessary to deliver this volume of gas is not yet determined.

The Downtown site has the potential to be the better site among the three for power delivered from the electrical grid. This downtown site is relatively close to National Grid’s Terminal substation located to the north at Harbor Point. The Terminal station has two transformers and distribution buses. As a result, it functions in a manner similar to two separate substations. National Grid would need to explore the possibility of running two dedicated 13.2 kV underground cables to the new hospital. This would provide a high level of reliability since the cables would serve only the hospital, be relatively short in distance, and have no exposure to the factors that impact overhead lines. While the other sites (Psych Center and existing St. Luke’s campus) can be fed from two 13.2 kV lines, as well, the lines would run aboveground and would not be dedicated; there is also the potential that the existing infrastructure could not handle the required loads. At the St. Luke’s site, there are two 46 kV circuits located at the intersection of Main Street, Clinton Street and Burrstone Road in New York Mills; lines could be extended from this intersection to St. Luke’s, which would improve the reliability at this location.

Scoring results under the Utilities category are as follows:

- Downtown – 6 points
- St. Luke’s – 8 points
- NYS Psych Center – 8 points

Accessibility

The accessibility criterion was based on distances from the site to NYS Thruway and other NYS routes, which consisted of:

- North-South Arterial including NYS Route 840 segment
- Oriskany Street/NYS Route 5A/ NYS Route 5S
- NYS Route 49
- Non-Arterial segments of NYS Routes 5 and 12

In addition, likely road and signal improvements were reviewed with NYSDOT Region 2 staff. Based on that coordination, it was identified that the Downtown location had the potential benefit of being planned in conjunction with the NYSDOT's Oriskany Street/5S project so that the access needs of the Hospital from Oriskany Street could be incorporated into the project.⁴⁶

To improve access, it is anticipated the Psychiatric Center location would require improvements along the Jason Street and Court Street corridors. For the St. Luke's location, signal improvement would be anticipated at The Burrstone Road and Champlin Avenue intersection.

Travel distance for employees was scored by reviewing zip code data of the employees to identify an approximate centroid of the base employment zone. The intersection of the North-South Arterial and the East-West Arterial (NYS Routes 8 and 840) was used as this centroid.

Based on a preliminary review of incorporating a helipad into the new facility, the 2015 analysis determined there were no significant overriding deficiencies, which would promote one site over another in reference to this criterion. Helicopter access is essentially design-driven including approach and departure procedures, which require two unobstructed flight paths in and out from the helipad. Coordination with municipal planners and zoning commissions are necessary to promote proper zoning, as well as safeguards to prevent future development from interfering with approved flight paths. The design should plan for growth, and account for proximity to sensitive receptors.

In regard to visibility, the downtown site is the only sight with direct sight lines to New York State routes. Scoring results under the Accessibility category are as follows:

- Downtown – 9 points
- St. Luke's – 6 points
- NYS Psych Center – 5 points

Zoning Approvals and Impact Fees

Basic zoning was reviewed for each site to identify if the hospital is an allowed use as-of-right and what the lot coverage and height requirements are. The zoning ordinances for the City of Utica and the Town of New Hartford were reviewed. While there are other components to zoning, these three regulations provide the ability to determine if a zoning change or creation of a Planned Unit Development would be warranted.

Zoning for the Downtown site and the St. Luke's campus are adequate and in place. For the Downtown site, the hospital is an allowed use with a special permit. The allowable lot coverage is 100%, and there are no height restrictions.

The St. Luke's campus is zoned as a planned development district, which allows the hospital use. Site plan approval by the Town of New Hartford would be required.

A hospital on the NYS Psych Center site is an allowed use by special permit. The lot coverage and height restrictions would not be sufficient for the project requirements and either a zone change or area variance would be required.

The additional sub-criteria relate to sewer offset requirements. Due to stormwater inflow and infiltration issues within the basin, development projects that are in the service area of the Sauquoit Creek Pumping Station (SCPS) require flow credits to be in place before they can proceed. The SCPS basin generally follows municipal borders. The towns of Whitesboro and New Hartford are inside the SCPS basin and the City of Utica is outside the basin.

Flow credits are established by tracking the amount of stormwater removed from the sanitary sewer system during a one-year, 24-hour storm and dividing that volume by 5. The flow credits, assuming they are available from the municipality, are then applied against the anticipated gallons per day of sewer flow of the pending

⁴⁶ The NYSDOT project is ongoing.

development project. In contrast, development within the City of Utica is currently not subject to sewer offset requirements, although it may impose similar restrictions in the future.

Although the St. Luke's site is located in New Hartford, a majority of its sewer discharges enter the City's sewer system. Assuming the connection to the City's system would remain, new development at the St. Luke's site would be viewed as outside the SCPS basin.

Scoring results under the Zoning Approvals and Impact Fees category are as follows:

- Downtown – 8 points
- St. Luke's – 8 points
- NYS Psych Center – 5 points

Monetary Factors

Site assembly was reviewed, in general terms, based on the number of properties involved in land acquisition. Consideration was also given to additional investment potential based on the site location and the project's relation to broader downtown revitalization, neighborhood revitalization, and/or preservation features. These same interests could also result in increased fundraising for the project (in addition to the State-designated allotment of \$300 million).

Constructability issues were weighed with regard to demolition, geotechnical, and phasing elements of the project. With regard to demolition, all three sites will require 2 to 4 acres of demolition and judged equal for this level of analysis. Geotechnical conditions are likely preferable at the NYS Psych Center and St. Luke's sites. However, further geotechnical studies will be needed to identify how these conditions will translate to the cost of foundation construction.

The St. Luke's site presents a challenge regarding construction phasing. The existing hospital operations will need to be maintained and protected during the construction of the new facility. If the new hospital were to be located on the current St. Luke's campus, a myriad of issues would need to be explored including:

- Construction and employee access – the need to continue hospital operations during construction increases health and safety concerns regarding potential conflicts between personnel, vehicles and equipment/materials accessing and egressing the site for operations vs. construction
- Circulation – the need to maintain dedicated and unhindered emergency access and site circulation (first responders, ambulances, patients) is mission critical
- Noise, vibrations, and other sensitivities – Noise, vibrations and other sensitivities (*i.e.*, construction lighting and emissions) have the potential to adversely impact on-going surgical and patient recovery activities

The Downtown site has the added benefit of utilizing some percentage of shared public parking, which may offset some operational costs. Sanitary sewer discharges from the St. Luke's site predominately flow into the City of Utica's combined sewer system and are, therefore, not subject to additional sewer fees established under the Sanitary Sewer Overflow (SSO) Mitigation Program to implement improvement projects in the SCPS basin.

Scoring results under the Monetary category are as follows:

- Downtown – 5 points
- St. Luke's – 4 points
- NYS Psych Center – 6 points

Community Factors, Perception & Sustainability

This section of the matrix evaluated the project's consistency with existing community policy documents; whether or not the site was in an existing neighborhood; and if there are sustainability features that could be implemented. For the community policy document review, the sites were examined to identify if they are

consistent with an existing comprehensive or master plan and if the site is within or adjacent to an existing or proposed Brownfield Opportunity Area (BOA).

Based on a review of available information, all three sites are consistent with a master plan and only the Downtown and NYS Psych Center sites are near proposed BOAs.⁴⁷

The next sub-criterion examined the location of each site in relation to the surrounding neighborhood. The Downtown site was identified as the only site not situated near a residential neighborhood, whereas St. Luke's and the NYS Psych Center sites are located near neighborhoods, although creation of a buffer is possible.

The final sub-criterion examined sustainability features as it relates to the ability to provide an energy microgrid and if it can be considered an urban infill project (vs. greenfield development). The Central Utility Building at the Downtown and NYS Psych Center sites have the potential to serve as microgrid power sources. CHP's are considered a more sustainable option for generating electric power versus relying 100% on the electrical grid. CHP's are more energy efficient and rely on cleaner sources (*i.e.*, gas turbines) reducing emissions of carbon dioxide and other air pollutants in comparison to regional power stations.

Finally, consideration was given to the Downtown and NYS Psych Center sites for re-purposing urban parcels for reuse, which is considered a sustainable initiative as higher densities in the urban environment minimizes the need for energy, allows for non-motorized types of transportation, and increases the efficiency for the delivery of utilities and services. While all three site options would likely comply with the State's Smart Growth Development Policy⁴⁸, the Downtown and NYS Psych Center sites would be viewed more favorably if state funds are pursued to assist with the development of either of these urban sites.

Scoring results under the Community Factors, Perception & Sustainability category are as follows:

- Downtown – 10 points
- St. Luke's – 4 points
- NYS Psych Center – 8 points

Environmental

For this portion of the matrix, the following factors were evaluated: 100-year floodplain, cultural resources, wetlands, steep slopes (amount of land with less than 15% slope), and endangered and threatened species.

All three sites are not located in a 100-year floodplain. Only the St. Luke's site is not listed or eligible for listing on the State and/or Federal Registers of Historic Places; it is also not located within an archeologically sensitive area. None of the sites encroach upon state wetlands or the regulated buffer area; St. Luke's does encroach upon a potential federal wetland. All three sites are relatively flat and none of the sites will have restrictions for clearing as it relates to the Indiana Bat and other protected endangered species. Development of the Downtown and NYS Psych Center sites will require coordination with the State Historic Preservation Office (SHPO). Buildings on the NYS Psych Center campus, particularly the building referred to as "Old Main"⁴⁹, will be subject to review associated with any renovation and/or reuse of these buildings, and any demolition that may be part of the hospital redevelopment. The capacity analysis shows integration of Old Main into the proposed redevelopment program, which likely would receive favorable support from SHPO. The Downtown site would likely require demolition of all buildings within the defined property boundaries for the hospital. This will also require coordination with SHPO.

⁴⁷ Being adjacent or within a BOA can be helpful in obtaining state funding if the project is consistent with the BOA planning document.

⁴⁸ <http://www.dec.ny.gov/lands/45970.html>

⁴⁹ https://en.wikipedia.org/wiki/Utica_Psychiatric_Center

The Downtown site also creates opportunities to catalyze development of key downtown buildings that lie on the periphery of the hospital development (*e.g.*, E. Tudor Williams Building, Utica Paint Buildings, as well as key buildings along the Genesee Street corridor).

Scoring results under the Environmental category are as follows:

- Downtown – 8 points
- St. Luke’s – 9 points
- NYS Psych Center – 8 points

2.3.6 Level 2 Analysis Findings

The final Level 2 scoring for the three sites is as follows:

- Downtown – 53 points
- St. Lukes – 46 points
- NYS Psych Center – 50 points

Of these three sites, the Downtown site scored highest. Some of the reasons for this advantage included:

- Water pressure and capacity are very good. Water capacity is such that is not anticipated that onsite storage will be needed to accommodate fire flows.
- The Downtown site is relatively close to National Grid’s Terminal Substation located to the north at Harbor Point. The Terminal station has two transformers and distribution buses. Dedicated underground cables can be provided to the new hospital. This would provide a high level of reliability.
- The city street is grid is an asset. Multiple routes can be used to arrive at the hospital.
- The site is less than two miles from the Thruway, less than 0.5 miles from the North-South Arterial (NYS Routes 5, 8 and 12), and located along Oriskany Street (NYS Routes 5A and 5S).
- The Downtown location has the benefit of being planned in conjunction with the NYSDOT’s Oriskany Street/5S project allowing the access needs of the hospital to be addressed as part of the original re-design of the roadway.
- The site is readily available to public transit.
- The site has high visibility.
- Sustainability/smart growth – Re-purposing urban parcels is considered a sustainable initiative as higher density in the urban environment minimizes the need for energy, allows for non-motorized types of transportation, and increases the efficiency for the delivery utilities and services.
- The site will not encroach on an existing residential neighborhood.
- The site is part of a broader downtown revitalization vision.

2.3.7 Other Sites

During the Lead Agency coordination process, the City Planning Board received correspondence from the New Hartford Shopping Center Trust (Trust)⁵⁰. The letter is included in Appendix C. The correspondents, which identified themselves as “leaseholders of a certain piece of property known as the New Hartford Shopping Center located in the Village of New Hartford,” requested that the site be considered as an alternative site for the proposed IHC project. The Trust offered the following supporting reasons⁵¹:

⁵⁰ Undated letter received February 20, 2018. Based on letter narrative, the Trust is the operator, not the owner of the property.

⁵¹ No additional documentation was provided.

- The property consists of approximately 42 acres. There are 32 acres of surface parking available, which would eliminate the need for the construction of indoor parking facilities
- The site is environmentally clean
- The site is located at the intersections of NYS Routes 5, 12, 8 and 840, plus has access from Genesee Street giving it access from every corner of the county
- The mandate from New York State is that the hospital must be built in the largest population center in the county. The site abuts City of Utica property, which is across Campion Road from the site, but is arguably centered in and around the largest population in the county
- The Trust would be open to maintaining control of the property and working out a lease agreement with MVHS, thereby keeping the property on the tax rolls. A pilot program could be worked out that would keep all public entities, town, county, city and school districts from suffering the loss, which would result from a not-for-profit hospital being built on tax exempt land
- The tenants currently in the Shopping Center have leases that expire on or before 2029, at which time the center will be vacant. Many leases expire well before then. There is no shortage of vacant retail space in the area into which tenants could be relocated, if necessary. The future of retail is in flux at best thus it seems that highest and best use of the center property may not be retail
- Hospitals could continuously operate without being interrupted by construction. There are no wetland issues here.
- Locating the hospital here would allow the development of the Varick Street-Bagg's Square corridor to continue unimpeded by the uncertainty of the proposed development

An evaluation of the New Hartford site is provided below. The evaluation is based on the same Level 1 parameters upon which the other twelve locations were assessed

New Hartford Shopping Center (Eliminated)

- Site is located substantially contiguous to a residential neighborhood
- Genesee Street in New Hartford is a high traffic volume corridor through a mixed residential and commercial area. Access points from the North-South Arterial, as well as the existing NYS Route 5/8/12 interchange, are antiquated
- Existing at-grade crossing of Campion Road to access site; Campion Road provides access to NYS Route 12 North and NYS Route 8 South
- Site is located outside the major population center as required in the 2015-2016 NYS budget legislation
- See narrative on Yahnudasis Golf Club, which is located adjacent to the New Hartford Shopping Center (Section 2.3.3)

2.4 ALTERNATIVE SCALE/MAGNITUDE

Based on information provided in the NYSDEC's SEQR Handbook, consideration of alternative scales or magnitudes may be reasonable under the following circumstances:

- Some or all potential impacts of the action can be avoided or reduced by a change in project size
- The change in project size does not reduce the project to the point where it will no longer serve its intended function. For example, a communication tower may require a minimum height for effective operation
- The reduction in project size may decrease potential profit, but does not make the project infeasible.

As indicated in the CON application (Appendix A), multiple facility options were analyzed, including:

- Maintaining both hospital sites (FSLH and SEMC)



- Consolidating one facility into the other facility based upon available land, feasibility with phasing and logistics
- Consolidating both facilities to a new campus.

The IHC will consolidate operations, resulting in a reduction in square footage and the number of beds, while meeting the community's future healthcare needs. In addition, the vertical build (tower) of the hospital and sharing of the parking garage further reduces the IHC footprint.

Based upon its analysis, MVHS decided that the option of consolidating both facilities to a new campus would be the most effective option. First, it would give MVHS the opportunity to improve patient access to serve the County's largest population center, which includes the 4th largest refugee program in the United States. Secondly, consolidating services to a single site would improve operational efficiency and maximize resources (including physicians and employees). Thirdly, a new, consolidated site will enable MVHS to reduce infrastructure and energy cost/consumption for decades to come. The existing SEMC and FSLH facilities were constructed in 1917 and 1957, respectively. A single campus would reduce the overall building square footage from 928,000± sf to approximately 670,000± sf (a 28% decrease).

2.5 ALTERNATIVE DESIGN

Based on information provided in the NYSDEC's SEQR Handbook, consideration of alternative project designs may be reasonable under the following circumstances:

- Some or all potential impacts of the action can be avoided or reduced by a change in project design, such as a change in traffic ingress/egress to direct traffic away from a quiet residential street to a county road, or a change in the facade of a structure to make it more compatible with its surroundings
- The alternative design may increase the overall project costs, but the increase is not prohibitive.

The project sponsor continues to review the project design, which, to date, has resulted in a minimization of the project footprint, modifications to access locations to facilitate access and traffic flow, an increase in greenspace, and addition of architectural elements to increase consistency with the surroundings. These types of design reviews and value-added vetting activities, which would occur regardless of the project site, will continue throughout the design process. No significant modifications, which would substantially change potential impact types and magnitudes, are anticipated.

2.6 ALTERNATIVE TIMING

Based on information provided in the NYSDEC's SEQR Handbook, consideration of timing or phasing alternatives may be reasonable in the following circumstances:

- The timing or phasing are necessary to avoid impacts to seasonal or temporary aspects of environmental resources, such as spawning or nesting seasons for certain fish and wildlife
- The timing or phasing alternative would not delay the start or extend the overall schedule of a proposed action to the point that project feasibility would be threatened.

Neither of those considerations are relevant to the proposed project. If the project is extended beyond the projected 40-month build-out, it is anticipated that the type and magnitude of impacts will not change. However, in an extended schedule scenario, the type and magnitude of impacts assessed within this DEIS would be extended over a longer period.