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Alternatives

As described in the *2021 CEQR Technical Manual*, alternatives selected for consideration in an environmental impact statement are generally those which are feasible and have the potential to reduce, eliminate, or avoid adverse impacts of a proposed action while meeting some or all of the goals and objectives of this action.

Introduction

As described in **Chapter 1, Project Description**, the Applicant proposes to redevelop approximately 78 acres of underutilized, largely asphalt surface parking areas (the Development Site) located west of Seaver Way and adjacent to Citi Field with a major mixed-use development (the Queens Future Project, or the Proposed Project). The Queens Future Project is anticipated to comprise up to approximately 3.7 million square feet (sf) of new construction, with destination entertainment that includes a music hall, hotel, a gaming facility,[1] convention and meeting space, restaurant and retail space, and office and community facility space. The Proposed Project would also include at least 20 acres of public park space and other public realm improvements as well as structured parking facilities to accommodate up to 13,750 spaces. The Project is anticipated to create 7,400 full-time jobs at the development, and 17,000 jobs during the construction period.

This chapter considers the following four alternatives to the Proposed Actions:

- No-Action Alternative
- Phoenix Meadows Alternative
- Proposed Project with Passerelle Bridge Reconstruction Alternative
- No Unmitigated Significant Adverse Impacts Alternative

[1] The inclusion of a gaming facility is contingent upon receiving a gaming license from the New York State Gaming Commission. See Required Approvals section below.

Principal Conclusions

No-Action Alternative

The No-Action Alternative is the future without the Proposed Actions (the No-Action condition), described in **Chapter 1, Project Description** and analyzed in **Chapter 2, Land use, Zoning, and Public Policy** through **Chapter 20, Construction**. Absent the Proposed Project, it is assumed that the Development Site would continue operating under existing conditions; it would remain as a paved parking area for Citi Field under the current lease agreement with the City, which runs through 2105. The surface parking lots within the Development Site currently contain 7,423 parking spaces.

Unlike the Proposed Project, under the No-Action Alternative, the significant adverse impacts related to transportation (operational and construction period) would not occur. However, the No-Action Alternative would not result in the development of destination entertainment facilities, restaurants and retail, community facility space, or 20-acres of public park space and other public realm improvements in areas currently occupied by surface parking. Therefore, the economic, infrastructure, and public realm benefits expected from the Proposed Actions, which include the public park space, an ADA-accessible renovated subway station, bike and pedestrian infrastructure and streetscape improvements, and highway improvements, would not be realized under the No-Action Alternative.

Phoenix Meadows Alternative

The Phoenix Meadows Alternative was created by Flushing for Equitable Development and Urban Planning (FED UP) Coalition in response to the Proposed Project and consists of a publicly released vision plan with limited design and technical detail. The Phoenix Meadows Alternative examines future conditions where a parkland restoration project would be undertaken to redevelop the mapped unimproved parkland on the Development Site, currently used as surface parking for Citi Field under a 1961 lease agreement with the City, into approximately 50 acres of new open space, while retaining the existing number of parking spaces.

The Phoenix Meadows Alternative would not include a substantial commercial component and therefore, would fail to realize the tourism and economic development goals of the Proposed Project. The Phoenix Meadows Alternative does not identify any mechanism to achieve either the development (three parking decks and two pedestrian bridges) associated with this Alternative or the many infrastructure improvements associated with the Proposed Project, which include at least 20 acres of public park space, an ADA-accessible renovated subway station, replacement of all the existing number of parking spaces, a Taste of Queens food hall and community space, bike and pedestrian infrastructure and streetscape improvements, and highway improvements that are made possible with the creation of the regional mixed-use recreational and entertainment hub that would be realized under the Proposed Actions. For these reasons, the Phoenix Meadows Alternative would not meet the Purpose and Need of the Proposed Project and is not considered a reasonable alternative.

Proposed Project with Passerelle Bridge Replacement Alternative

The Proposed Project with Passerelle Bridge Replacement Alternative would involve the replacement of the Passerelle Bridge at the same time as the Proposed Project. This alternative would include all the components of the Proposed Project, as well as the replacement of the Passerelle Bridge. As a

design for the replacement bridge has not yet been developed, for analysis purposes, the bridge replacement would include the following components: replacement of the bridge structure substantially in the same location and with the same dimensions as the existing Passerelle Bridge; upgrades to achieve ADA compliance; and exterior improvements to the Passerelle Building, to provide weather-tight structures and extend the useful life of the building as the main gateway to Flushing Meadows Corona Park.

Since the only difference between the Proposed Project and the Passerelle Bridge Replacement Alternative would be the replacement of the Passerelle Bridge, the only impacts of this Alternative that would differ from those of the Proposed Project would be those associated with construction and operation of the reconstructed Passerelle Bridge. These include long-term (operation-related) impacts to historic and cultural resources and short-term (construction-related) impacts. Since this alternative entails demolishing and replacing the Passerelle Bridge, a S/NR-eligible contributing resource to the Flushing Meadows Corona Park Historic District, altering the bridge's current condition could result in a significant adverse impact to historic and cultural resources. The bridge replacement would require review by Parks, New York State Historic Preservation Office, and the New York City Landmarks Preservation Commission. Additionally, the potential for design changes and mitigation measures would need to be explored to the extent necessary. Since a construction staging plan is not yet available, ~~Construction impacts and potential cumulative impacts will be assessed based on a staging plan that would be developed between the Draft EIS (DEIS) and Final EIS (FEIS). However,~~ it is conservatively assumed at this time that there would be significant adverse impacts during the construction period. Once a detailed construction staging plan is developed, ~~and~~ potential mitigation measures will be explored with the New York State Historic Preservation Office ~~between the DEIS and FEIS~~.

No Unmitigated Significant Adverse Impacts Alternative

The No Unmitigated Significant Adverse Impact Alternative identifies those modifications to the Proposed Actions that would be required to eliminate all of the Proposed Actions' unmitigated significant adverse impacts. The Proposed Project would result in significant adverse impacts to traffic and pedestrian elements[2] that could not be fully mitigated.

While this alternative considers development that would not result in any unmitigated significant adverse impacts, to eliminate all unmitigated significant adverse impacts, the Proposed Actions would need to be so substantially modified that the project goals and objectives would not be realized.

~~Flows from the Proposed Project, which would contribute to an exceedance of the capacity of the 24-inch sanitary main and the 37th Avenue Pump Station, could result in a potential significant impact to sewer infrastructure. Additional analysis will be undertaken between the DEIS and FEIS of the hydraulic capacity of the 24-inch sewer and of the capacity of the 37th Avenue pump station. If it is confirmed that the flow levels in the With-Action condition would exceed available capacity to an extent considered significant consistent with *CEQR Technical Manual* guidance (taking into account capacity limitations resulting from developments under the No-Action condition), a significant adverse impact would occur, In that event, potential mitigations could include a replacement of the 24-inch sanitary~~

[2] As discussed in **Chapter 11, Water and Sewer Infrastructure**, since the publication of the Draft Environmental Impact Statement, the New York City Department of Environmental Protection has coordinated with the Applicant regarding the sanitary sewer infrastructure, and it has been determined that the Proposed Project would not result in a significant adverse impact to sewer infrastructure.

~~main and/or infrastructure upgrades to increase the capacity of the 37th Avenue Pump Station. Should these measures be unable to fully address the capacity shortfall, the impact would be unmitigated.~~

The Proposed Project would result in significant adverse traffic impacts that could not be fully mitigated with standard traffic capacity improvement measures during non-gameday and gameday peak periods. These impacts would result from a minimal increase in vehicle trips because of prevailing background traffic conditions. Even a minimal increase in traffic and pedestrians above No-Action condition levels would be expected to result in traffic impacts that could not be mitigated. Based on a sensitivity analysis conducted at the intersection of Roosevelt Avenue and 114th Street, the addition of just two incremental vehicles at critical movements during the non-gameday weekday PM peak hour would create a significant adverse impact that could not be fully mitigated. Therefore, any development increment larger than the No-Action development would be expected to result in unmitigated significant adverse traffic impacts.

The Proposed Project would result in significant adverse impacts at pedestrian elements during the non-gameday and gameday peak periods. Based on a sensitivity analysis performed at the east and west crosswalks at the intersection of Roosevelt Avenue and 126th Street/Seaver Way, it was determined that the Proposed Actions would require a 35 percent reduction in the development increment during the non-gameday Saturday PM peak hour to avoid unmitigated pedestrian impacts. Given the above, there is no Unmitigated Significant Adverse Impact Alternative to the Proposed Actions any larger than the No-Action Alternative.

No-Action Alternative

Description of the No-Action Alternative

The No-Action Alternative examines future conditions absent approval of the Proposed Actions. Absent the Proposed Actions, it is assumed that the Development Site would continue operating under existing conditions; it would remain as a paved parking area containing 7,423 parking spaces for Citi Field under the current lease agreement with the City. No new development would occur at the Development Site by the analysis year of 2030. The technical chapters of this EIS have described the No-Action Alternative as the "No-Action condition."

The No-Action Alternative would not meet the goals of the Proposed Actions, and the economic, infrastructure, and public realm benefits expected from the Proposed Actions, which include at least 20 acres of public park space, an ADA-accessible renovated subway station, bike and pedestrian infrastructure and streetscape improvements, and highway improvements, would not be realized under this alternative. The No-Action Alternative would not result in any significant adverse impacts, as no development would occur absent the Proposed Actions.

Conditions under the No-Action Alternative in comparison to the future with the Proposed Actions are described below.

Land Use, Zoning, and Public Policy

In the No-Action Alternative, the Development Site is assumed to remain largely unchanged from existing conditions, under which it includes only the existing paved parking area. There are new developments anticipated to be completed by the 2030 analysis year within the quarter-mile study

area under the future No-Action condition, including Willets Point Phases 1 and 2, and several infrastructure improvements. Willets Point Phase 1 would result in the construction of approximately 892,635 gross square feet (gsf) of residential space containing 1,100 affordable units, of which 220 units would be allocated to seniors; 23,756 gsf of retail space; 3,159 gsf community facility space; and a 128,000-gsf public school with 650 seats. Willets Point Phase 2 would result in the construction of approximately 1,190,000 gsf of residential space containing an additional 1,400 affordable residential units; 60,000 gsf of retail space; 215,000 gsf of hotel space (with 250 rooms); and a 500,000-gsf soccer stadium (with 25,000 seats). It will also include 2.77 acres of open space.

The No-Action Alternative would not include the development of destination entertainment facilities, restaurants and retail, or 20-acres of public park space and other public realm improvements in areas currently occupied by surface parking. In the No-Action Alternative, the Mets-Willets Point NYCT No. 7 Train Subway Station would not be made fully ADA accessible or renovated. In the No-Action Alternative, a pedestrian bridge would not be provided over Shea Road and connect to a protected bike and pedestrian way underneath the Whitestone Expressway on the western side of Boat Basin Place. In addition, under the No-Action Alternative, a new, dedicated pedestrian/bike bridge over the highway ramps would not replace the existing at-grade crosswalk at the ramp from the westbound Grand Central Parkway to the eastbound Whitestone Expressway. In the No-Action Alternative, sidewalks would not be added along Shea Road and widened along Roosevelt Avenue. The mid-block crosswalks connecting the north and south sides of Roosevelt Avenue at the Mets-Willets Point NYCT No. 7 Train Subway Station would not be widened and enhanced. In addition, a new crosswalk would not be added across Roosevelt Avenue at Stadium Place South. In the No-Action Alternative, bicycle lanes would not be included along Roosevelt Avenue, Shea Road, near Stadium Place North and under the Whitestone Expressway to create a protected bike lane connection along the northern, western, and southern edges of the Development Site. A shared path would not be proposed from Boat Basin to Seaver Way within the northeastern portion of the Development Site to connect to the proposed bike lanes in the Willets Point neighborhood.

In the No-Action Alternative, zoning map changes and public policies affecting the study area are expected to remain unchanged from existing conditions.

Overall, neither the No-Action Alternative nor the Proposed Actions would result in significant adverse impacts to land use, zoning, or public policy.

Socioeconomic Conditions

In the No-Action Alternative, residential and commercial development associated with Willets Point Phases 1 and 2 would occur within the study area by the 2030 analysis year and no development would occur on the Development Site. In the No-Action Alternative, additional visitors associated with the Proposed Project would not patronize Subarea 3 – Corona. The restaurants and the hotel in Subarea 3 – Corona would not serve visitors to the Proposed Project.

As detailed in **Chapter 3, Socioeconomic Conditions**, it is not anticipated that the introduction of new regional entertainment uses to the study area by the Proposed Project would create significant adverse impacts to the socioeconomic character of the study area in the future with the Proposed Actions. As such, neither the No-Action Alternative nor the Proposed Actions would be expected to have any significant adverse socioeconomic conditions impacts.

Community Facilities and Services

The No-Action Alternative would not alter any existing community facilities, whether by displacement of the facility or other physical change. Therefore, neither the No-Action Alternative nor the Proposed Actions would result in significant adverse impacts due to direct effects on community facilities and services. Like the Proposed Actions, the No-Action Alternative would not introduce a new residential population that would utilize existing public schools, early childhood programs, or libraries, and therefore like the Proposed Actions, no indirect impacts to these facilities would occur due to increased demand under the No-Action Alternative. The No-Action Alternative would not introduce new workers and other non-residential populations to the Development Site. Therefore like the Proposed Actions, the No-Action Alternative would not have the potential to result in significant adverse impacts to police and fire services.

Open Space

The No-Action Alternative would not result in the creation of 20 acres of public park space on the Development Site. Absent the Proposed Actions, it is assumed that the Development Site would continue operating under existing conditions; it would remain as a paved parking area and the benefit of 20 acres of new public open space would not be realized. Under the No-Action Alternative, it is assumed that the Development Site would not result in new destination entertainment uses and therefore would not introduce new non-resident open space visitors. Analysis concludes that in the future with the Proposed Actions, non-residents would be adequately served by open space resources as detailed in **Chapter 5, Open Space**. As such, neither the No-Action Alternative nor the Proposed Actions would have any direct nor indirect impacts on open space resources.

Shadows

The No-Action Alternative would not involve any new construction, and therefore, new shadows would not be cast. As discussed in **Chapter 6, Shadows**, the Proposed Actions would introduce building envelopes up to 344 feet in height and a detailed analysis of incremental shadows was conducted to assess the potential effects. The analysis concludes that, while the Proposed Project would cast new shadows on sunlight-sensitive resources, the extent and duration of these incremental shadows would not result in any significant adverse impacts to these resources. As such, neither the No-Action Alternative nor the Proposed Actions would result in significant adverse shadows impacts.

Historic and Cultural Resources

Since the No-Action Alternative would not result in any development, it would not affect any nearby historic resources. While the Proposed Actions would result in ground disturbance, the Landmarks Preservation Commission (LPC) has determined that the Development Site does not possess archaeological sensitivity. Therefore, neither the Proposed Actions nor the No-Action Alternative would affect archaeological resources.

As described in **Chapter 7, Historic and Cultural Resources**, the Development Site, Project Area, and Study Area contain portions of the S/NR-eligible Flushing Meadows Corona Park Historic District, which has several contributing resources. Two of these contributing resources are within the Development Site and Project Area: the Willets Point Subway Station/IRT Interlocking Tower and the

Passerelle Bridge. Six of the contributing resources (including the Porpoise Bridge which also is individually S/NR eligible) are located within the Study Area, south of the Development Site and Project Area. The final architectural resource within the Study Area is the World's Fair Marina Pavilions/Candela Structures (S/NR-eligible), located north of the Development Site and Project Area. Because the No-Action Alternative would not involve any development, this alternative would not have the potential to impact any of these historic resources. Similarly, development associated with the Proposed Project is also not expected to impact these historic resources. Therefore, neither the Proposed Actions nor the No-Action Alternative would result in significant adverse impacts to architectural resources.

Urban Design and Visual Resources

As no change would occur on the Development Site in the No-Action Alternative, it would not have a significant adverse impact on urban design and visual resources. As detailed in **Chapter 8, Urban Design and Visual Resources** changes to urban design elements of the study area as a result of the Proposed Actions would be consistent with both existing urban design elements and those being developed in the area under future No-Action conditions, such as the Willets Point Development Projects that will transition the Willets Point peninsula from an industrial area into a mixed-use neighborhood and entertainment destination, adding more pedestrian activity and open spaces to the area. Therefore, neither the No-Action Alternative nor the Proposed Actions would result in significant adverse impacts to urban design and visual resources.

Natural Resources

The No-Action Alternative would not affect natural resources, as no changes to the Development Site would occur. As detailed in **Chapter 9, Natural Resources**, development of the Proposed Project would result in habitat replacement and removal of vegetation, both of which are identified as direct effects to natural resources in Chapter 11 of the *CEQR Technical Manual*. As compared to existing conditions (and the No-Action condition), habitat replacement under the Proposed Project would result in an overall expansion of vegetated habitats and a reduction in unvegetated/impervious surfaces, thereby improving habitat conditions and resulting in a net ecological benefit for the Project Area over time. As a result of proposed tree replacement measures that would increase the quantity and quality of trees within the Project Area, the direct effects of tree removals under the Proposed Actions would be fully addressed over time as the replacement trees reach maturity. Similarly, direct effects on wildlife from habitat loss due to tree removal under the Proposed Project would not be permanent and would be fully addressed over time through the maturation of replacement trees and expansion of vegetated habitats.

There are currently no records for New York State or federally listed plants, wildlife, or significant natural communities in the Project Area or vicinity, and the Project Area and vicinity do not provide suitable habitat for the four federally listed species known to occur regionally. Accordingly, the Proposed Project would not result in direct or indirect effects to rare/protected species.

In Jurisdictional Determination No. 2-6302-00857/00004, issued July 31, 2024, the New York State Department of Environmental Conservation (NYSDEC) determined that the Project Area is not located within jurisdictional areas regulated under the Tidal Wetlands Act (Environmental Conservation Law Article 25), the Freshwater Wetlands Act (Environmental Conservation Law Article 24), or under the Costal Erosion Hazard Area (CEHA) program (Environmental Conservation Law Article 34). Accordingly,

NYSDEC Tidal Wetlands, Freshwater Wetlands, or CEHA permits would not be required for the Proposed Project. As there are no wetlands or surface waters located at or adjacent to the Project Area, the Proposed Project would not result in direct effects to same. Indirect effects to Flushing Bay (located approximately 120 feet (ft) to the north of the Project Area) due to shadows, stormwater generation, and sanitary flows would not result in significant adverse effects to this natural resource. Potential adverse impacts to Flushing Bay and other natural resources during construction will be avoided through best management practices and adherence to all conditions of an NYSDEC-approved Stormwater Pollution Prevention Plan.

Therefore, neither the No-Action Alternative nor the Proposed Actions would result in significant adverse impacts to natural resources.

Hazardous Materials

As described in **Chapter 10, Hazardous Materials**, subsurface investigations on the Development Site have been conducted and concluded that soil, groundwater, and soil vapor contamination is present. The Proposed Actions would include the placement of an (E)-Designation on the Development Site to ensure that supplemental testing for and remediation of hazardous materials are completed prior to future development, thereby mitigating potential risk and exposure relating to the presence of hazardous materials in the subsurface.

The No-Action Alternative would not involve development and therefore, the Development Site would remain in its existing contaminated condition but would not result in a significant adverse impact. Therefore, neither the No-Action Alternative nor the Proposed Actions would result in significant adverse impacts to hazardous materials.

Water and Sewer Infrastructure

The No-Action Alternative would not increase impervious surfaces, result in new commercial development, or substantially increase water demand. Therefore, this alternative would not result in an increase in demand on water and sewer infrastructure. Like the Proposed Project, the No-Action Alternative would not result in any significant adverse stormwater impacts. As detailed in **Chapter 11, Water and Sewer Infrastructure**, the Proposed Project would result in a total daily water demand of approximately 0.91 mgd and although the Proposed Project does not exceed the CEQR threshold of 1 million gallons per day ~~that would require a preliminary infrastructure assessment of water supply or affect the 72-inch trunk water main~~, the Applicant coordinated with the New York City Department of Environmental Protection (NYCDEP) regarding ~~will undertake further analysis of~~ the local distribution system to the Queens Future Project ~~in coordination with NYCDEP~~. To provide redundancy and resiliency, the Proposed Project would include the construction of a new 20-inch watermain[3]. The Applicant will coordinate with NYCDEP, and other city agencies as appropriate, on the specifics of the new water infrastructure, including routing and connections (anticipated to be either to existing mains on Roosevelt Avenue or Shea Road), to the water distribution system that are acceptable to NYCDEP. Therefore, like the Proposed Project, the No-Action Alternative would not result in any significant adverse water impacts.

As detailed in **Chapter 11, Water and Sewer Infrastructure**, since the publication of the Draft Environmental Impact Statement (DEIS), NYCDEP has coordinated with the Applicant regarding the

[3] Or an alternative proposed by the Applicant that is acceptable to NYCDEP.

sanitary sewer infrastructure. A Drainage Proposal Plan for the Willets Point Project Phase 2 Development was approved by NYCDEP; the Approved Drainage Plan included flows from the Willets Point Project Phase 1 and Phase 2 Developments, and flows from a previously proposed but now cancelled infrastructure project. This infrastructure project had a projected flow of 1.75 cfs that will never be realized but was accounted for within the Approved Drainage Plan and NYCDEP's assessment of the capacity of the 24-inch sewer under the Grand Central Parkway and 37th Avenue Pump Station. Because the flow from the Proposed Project is 1.43 cfs, less than the 1.75 cfs from the cancelled infrastructure project, the flow from the Proposed Project would not exceed the flow within the previously Approved Drainage Plan.

NYCDEP prepared a hydraulic analysis of the 24-inch sewer and the hydraulic model demonstrates that the 24-inch sewer is under surcharge conditions in the No-Action condition (with the approved flows from the Willets Point Phase 1 and Phase 2 Developments and canceled infrastructure project); the surcharge condition would continue in the With-Action condition. However, because of the decrease in flow from the Proposed Project, as compared to the flows in the NYCDEP Approved Drainage Plan noted above, the Proposed Project would decrease the surcharge condition relative to the surcharge under the NYCDEP Approved Drainage Plan. Therefore, the Proposed Project would not require modifications to the existing 24-inch sewer. ~~flows from the Proposed Project, which would contribute to an exceedance of the capacity of the 24-inch sanitary main and the 37th Avenue Pump Station, could result in a potential significant impact to sewer infrastructure. Additional analysis will be undertaken between the DEIS and FEIS of the hydraulic capacity of the 24-inch sewer and of the capacity of the 37th Avenue pump station. If it is confirmed that the flow levels in the With-Action condition would exceed operating capacity to an extent considered significant consistent with *CEQR Technical Manual* guidance, a significant adverse impact would occur. In that event, potential mitigations could include capacity enhancements to the 24-inch sanitary sewer and/or the pump station, or other infrastructure improvements or operational changes that would avoid the impact.~~ .

Therefore, ~~Un~~like the Proposed Actions, the No-Action Alternative would not ~~have the potential to~~ result in significant adverse impacts to water, wastewater or stormwater ~~and sewer infrastructure~~.

Solid Waste and Sanitation Services

As no development would occur under the No-Action Alternative, no solid waste would be generated, and sanitation services would not be affected. As discussed in **Chapter 12, Solid Waste and Sanitation Services**, development associated with the Proposed Actions would generate an incremental 464.97 tons of solid waste per week, equivalent to 31 commercial carter truck loads, which would represent approximately 0.628 percent of the City's anticipated future commercial waste generation. All solid waste generated by the Proposed Project would be handled by private carters and would not affect DSNY-managed services. Under the Commercial Waste Zone Program, there will be up to three private carters authorized to serve each designated zone and up to five carters authorized for citywide containerized collection by 2026. Commercial collection fleets are expected to be sufficiently flexible to accommodate this increased demand for solid waste collection. As such, the Proposed Actions would not result in an increase in solid waste that would overburden available waste management capacity. The Proposed Actions would also not conflict with, or require any amendments to, the City's solid waste management objectives as stated in the SWMP. The Applicant would also explore several measures to reduce solid waste generation from the Proposed Project. Therefore, neither the No-Action Alternative nor the Proposed Actions would result in a significant adverse impact on solid waste and sanitation services.

Energy

The No-Action Alternative would not induce development and therefore would not increase energy demand. The Proposed Project would result in increased demand of approximately 793,815,800 thousand British thermal units (MBtus) of energy per year, compared with the No-Action condition. This increase in annual demand represents less than 0.01 percent of the projected service demand for New York City in the 2030 build year and would not have a significant impact on energy transmission or services. The Proposed Actions would result in a negligible amount of annual energy consumption and would not place a significant burden on the Con Edison energy system. In addition, any new development resulting from the Proposed Actions would be required to comply with the NYCECC, which dictates performance standards of heating, ventilation, and air condition systems as well as the exterior building envelope of new buildings. Therefore, neither the No-Action Alternative nor the Proposed Actions would result in significant adverse energy impacts.

Transportation

Under the No-Action Alternative, the existing number of parking spaces and the pattern of traffic flows would not change. In addition, the Proposed Action's improvements to the Mets-Willets Point NYCT No. 7 Train Subway Station that would make it fully ADA accessible and numerous pedestrian and bike improvements would not be realized under the No-Action Alternative. Traffic, transit, and pedestrian volumes would increase due to background growth and development within the study area, as there are several new developments that are scheduled to be completed by the 2030 build year.

The No-Action Alternative would not result in significant adverse impacts at any of the intersections (identified in **Chapter 14, Transportation**) that would experience significant adverse impacts as a result of the Proposed Actions, during the weekday and weekend peak hour conditions.

The No-Action Alternative is also not expected to exceed significant impact criteria for any of the Basic, Merge, Diverge, and Weave highway sections (identified in **Chapter 14, Transportation**) that would experience significant adverse impacts as a result of the Proposed Actions for gameday and non-gameday conditions during the weekday and weekend peak hour conditions.

Unlike the Proposed Actions, the No-Action Alternative would not result in significant adverse impacts at any pedestrian elements (corner, crosswalk or sidewalk) that would experience significant adverse impacts as a result of the Proposed Actions for gameday and non-gameday conditions during the weekday and weekend peak hour conditions.

Neither the No-Action Alternative nor the Proposed Actions would result in significant adverse impacts to subway line-haul or station elements. Unlike the Proposed Actions, the No-Action Alternative would not result in significant adverse impacts to the Q48 bus route in any time period.

Neither the No-Action Alternative nor the Proposed Actions would result in significant adverse parking impacts.

Air Quality

Similar to the Proposed Actions, the No-Action Alternative would not significantly change emissions from the surface parking facilities since it would not result in any new development; therefore, it would not result in significant adverse air quality impacts due to parking facilities. Furthermore, no

large or major sources were identified within a 1,000-foot radius of the Project Area and therefore emissions from such sources are not anticipated in under the Proposed Action or the No-Action Alternative. Several commercial facilities/industrial sources were identified within a 400-foot radius from the Development Site boundary. Most of these facilities will be demolished as part of Willets Point Phase 2 except for three facilities that will continue to operate until Phase 3 of the Willets Point Development project is built in 2039. Therefore, neither the No-Action Alternative nor the Proposed Actions would result in significant adverse air quality impacts from industrial sources.

The No-Action Alternative air quality impacts from traffic emissions were analyzed using AERMOD dispersion modeling at the same intersections as the With-Action impacts. The results are presented in **Chapter 15, Air Quality**. Results presented in **Table 15-8**, **Table 15-9**, and **Table 15-10** for CO, ~~**Table 15-9**~~ **Table 15-11** for 24-hour $PM_{2.5}$, and **Table 15-12**~~**0**~~ and **Table 15-13**~~**1**~~ for annual $PM_{2.5}$ impacts indicate that total concentrations near the analyzed intersections under the No-Action condition will be below the respective National Ambient Air Quality Standards (NAAQS) and CEQR *de minimis* criterion. Therefore, neither the No-Action Alternative nor the Proposed Actions would result in an adverse impact as a result of this type of emission.

Greenhouse Gas Emissions and Climate Change

As no development would occur under the No-Action Alternative, there would be no significant changes to energy consumption and carbon dioxide equivalent (CO2e) emissions and as with the Proposed Actions, the No-Action Alternative would not result in significant greenhouse gas (GHG) emissions or climate change impacts.

Noise

Similar to the Proposed Actions, there would be an increase in background traffic under the No-Action condition which would result in an increase in ambient noise conditions. No-Action noise conditions have been determined based on ambient noise measurements and proportional traffic noise modeling. No-Action sound levels would typically be 1 to 2 dBA higher than existing conditions with a maximum increase of up to 1.4 dBA. The No-Action L_{eq} sound levels would range from 68.7 to 71.4 dBA and the L_{10} sound levels would range from 69.2 to 74.0 dBA. Absent the Proposed Actions, new noise-sensitive receptors would not be introduced at the Development Site. Therefore, there would be no need to require a minimum composite window/wall sound attenuation and neither the No-Action Alternative nor the Proposed Actions would result in significant adverse noise impacts.

Public Health

Under the No-Action Alternative, no significant adverse impacts would occur in any of the technical areas related to public health (hazardous materials, water quality, air quality, or noise). However, as detailed above, unlike the Proposed Actions, the No-Action Alternative would not be required to comply with and set in place various regulatory mechanisms to ensure certain CEQR standards are met. In the No-Action Alternative, an (E) Designation for hazardous materials would not be placed on the Development Site.

Neighborhood Character

Similar to the Proposed Actions, the No-Action Alternative would not result in significant adverse impacts associated with neighborhood character. As detailed in the relevant sections above, the No-Action Alternative would not result in significant adverse impacts in the contributing technical areas of land use, zoning, and public policy; open space; shadows; historic and cultural resources; urban design and visual resources; or noise. The significant adverse impacts identified for the Proposed Actions in transportation (traffic, bus transit and pedestrians), would not occur under the No-Action Alternative. As discussed in **Chapter 19, Neighborhood Character**, these impacts under the Proposed Actions would not constitute a significant impact on neighborhood character.

However, under the No-Action Alternative, the beneficial aspects of the development introduced by the Proposed Actions—including improvements to the highway and local roadway networks, the introduction of 20 acres of public park space, improvements to the Mets-Willets Point NYCT No. 7 Train Subway Station that would make it fully ADA accessible, and numerous pedestrian and bike improvements—would not be realized nor contribute to the neighborhood character of the study area.

Construction

Construction activities would not occur under the No-Action Alternative. Unlike the Proposed Actions, the No-Action Alternative would not result in significant adverse traffic and pedestrian impacts during the construction-period. Similar to the Proposed Actions, the No-Action Alternative would not result in construction-period impacts related to the other technical areas analyzed in **Chapter 20, Construction**.

Phoenix Meadows Alternative

In response to public comments on the Draft Scope of Work, the Phoenix Meadows Alternative was analyzed and compared to the Proposed Action to consider whether it would better achieve the purpose and need of the Proposed Project, as described below.

Description of the Phoenix Meadows Alternative

The Phoenix Meadows Alternative was created by Flushing for Equitable Development and Urban Planning (FED UP) Coalition in response to the Proposed Project and consists of a publicly released vision plan with limited design and technical detail. The Phoenix Meadows Alternative examines future conditions where a parkland restoration project would be undertaken to redevelop the mapped unimproved parkland on the Development Site, currently used as surface parking for Citi Field under a 1961 lease agreement with the City, into approximately 50 acres of new open space, while retaining the existing number of parking spaces.

According to the Phoenix Meadows Vision Plan and the Phoenix Meadows Vision Plan Presentation,[4] the Phoenix Meadows Alternative would involve the construction of three stacked parking decks on the Development Site. Two decks, labeled as #3 and #2 in the "Vision Plan Presentation," would be located in the approximate locations of Areas of Development B and D, respectively, of the Proposed

[4] Phoenix Meadows Vision Plan — Queens for all

Project and would contain active recreation uses on the roof of the decks. A third deck, labeled as #1, (which appears to be a two-level parking structure with the largest footprint) would be located to the southwest of Citi Field, located adjacent to the Mets-Willets Point NYCT No. 7 Train Subway Station and extending north and west. This third deck would be covered with open space which would slope down towards the western portion of the Development Site. The Phoenix Meadows Vision Plan and the Phoenix Meadows Vision Plan Presentation do not indicate the size of each parking structure, the number of levels for each structure, or the number of parking spaces in each structure; however, the Phoenix Meadows Vision Plan Presentation notes that there would be "no loss of parking."

The open space would contain various passive and active open space amenities as well as public plazas and space for food vendors. According to the Phoenix Meadows Vision Plan Presentation, berms and trees would line the edges of the open space, rain ponds would be constructed at lower elevations to capture and reuse 100% of run-off, and approximately 3,000 trees would be planted. This alternative would also include infrastructure improvements including a new pedestrian walkway through the Development Site from Flushing Meadows Corona Park to the waterfront at Flushing Bay as well as two new bike/pedestrian bridges, one shown as an elevated bridge over the Whitestone Expressway and Northern Boulevard, connecting to the waterfront at Flushing Bay and another shown as an elevated bridge over Shea Road and the Grand Central Parkway connecting to the Corona neighborhood to the west.

The Phoenix Meadows Vision Plan and the Phoenix Meadows Vision Plan Presentation does not indicate what discretionary approvals would be required to implement the Phoenix Meadows Alternative, the build year and timetable in which it would be completed, or how it would be funded for construction or operation. It also does not address the fact that the Development Site is governed by a long-term lease from the City to the Mets. The Phoenix Meadows Vision Plan notes "We are calling on our elected officials and the City to leverage the millions of dollars in resilience planning available at the Federal and State level to help advance a community-centered process and vision."

Ability to Meet Purpose and Need of the Proposed Actions

The Phoenix Meadows Alternative would not include a substantial commercial component and therefore, would fail to realize the tourism and economic development goals of the Proposed Project. Unlike the Proposed Actions, the Phoenix Meadows Alternative would not pursue a gaming license from the New York State Gaming Commission, and therefore would not include the use that under the Proposed Actions would generate thousands of local quality jobs for area residents and would not enable significant private investment in public infrastructure improvements. The Phoenix Meadows Alternative does not identify any mechanism to achieve either the development (three parking decks and two pedestrian bridges) associated with this Alternative or the many infrastructure improvements associated with the Proposed Project, which include at least 20 acres of public park space, an ADA-accessible renovated subway station, replacement of all the existing number of parking spaces, a Taste of Queens food hall and community space, bike and pedestrian infrastructure and streetscape improvements, and highway improvements that are made possible with the creation of the regional mixed-use recreational and entertainment hub that would be realized under the Proposed Actions.

As described in **Chapter 1, Project Description**, the Applicant for the Proposed Project would work to maximize local hiring and prioritize opportunities for unemployed or underemployed individuals from the surrounding communities. In addition, the Proposed Project may contribute to the growth of small businesses in adjacent neighborhoods through business-to-business interactions and by

providing access to expanded clienteles and spillover visitor spending. The Phoenix Meadows Alternative does not provide for these benefits.

For these reasons, the Phoenix Meadows Alternative would not meet the Purpose and Need of the Proposed Project and is not considered a reasonable alternative.

Phoenix Meadows Alternative Compared with the Proposed Actions

As noted above, the description of the Phoenix Meadows Alternative is based on the publicly released Phoenix Meadows Vision Plan and the Phoenix Meadows Vision Plan Presentation, which include plans for illustrative purposes only. No scaled plans, drawings or elevations (at the equivalent level as presented for the Proposed Project) that show any details of the parking structures, open space, or pedestrian bridges are provided. Therefore, it is not possible to fully assess the potential significant adverse impacts of the Phoenix Meadows Alternative, and further information may lead to additional identified impacts of the Alternative; however, based on these illustrative plans, a comparison of the potential impacts of the Phoenix Meadows Alternative with those of the Proposed Actions indicates the following:

- Neither the Proposed Project nor the Phoenix Meadows Alternative would generate significant adverse impacts on land use, zoning, and public policy; socioeconomic conditions; community facilities and services; open space; shadows; historic and cultural resources; urban design and visual resources; natural resources; water and sewer infrastructure; solid waste and sanitation; energy; air quality; greenhouse gas emissions and climate change; noise; or neighborhood character. [5]
- Like the Proposed Project, the Phoenix Meadows Alternative could have significant adverse impacts related to transportation (traffic, buses, pedestrians); and construction (traffic and pedestrians). As described below under the No Unmitigated Significant Adverse Impact Alternative, based on a sensitivity analysis conducted at the intersection of Roosevelt Avenue and 114th Street, the addition of just two incremental vehicles at critical movements during non-gameday weekday PM peak hour would create a significant adverse impact that could not be fully mitigated. Therefore, any development increment on the Development Site larger than the No-Action condition would be expected to result in unmitigated significant adverse traffic impacts.
- As discussed above, the Phoenix Meadows Alternative, like the Proposed Actions, proposes to replace the 7,423 existing surface parking spaces on site in structured garages. Without available information regarding the connections of the parking garages to the highway network, routing patterns, and garage sizes, it is possible that additional transportation impacts could occur under the Phoenix Meadows Alternative that would be avoided with the Proposed Project through its project design and without having detailed design plans for the Phoenix Meadows Alternative, it is possible that the Alternative could also result in significant adverse impacts to buses and

[5] As discussed in **Chapter 11, Water and Sewer Infrastructure**, since the publication of the Draft EIS, NYCDEP has coordinated with the Applicant regarding the sanitary sewer infrastructure, and it has been determined that the Proposed Project would not result in a significant adverse impact to sewer infrastructure.~~flows from the Proposed Project, which would contribute to an exceedance of the capacity of the 24-inch sanitary main and the 37th Avenue Pump Station, could result in a potential significant impact to sewer infrastructure. Additional analysis will be undertaken between the DEIS and FEIS of the hydraulic capacity of the 24-inch sewer and of the capacity of the 37th Avenue pump station. If it is confirmed that the flow levels in the With-Action condition would exceed operating capacity to an extent considered significant consistent with *CEQR Technical Manual*, a significant adverse impact would occur. In that event, potential mitigations could include capacity enhancements to the 24-inch sanitary sewer and/or the pump station, or other infrastructure improvements or operational changes that would avoid the impact.~~

pedestrians. Similarly, without having detailed design and construction plans, it is possible that the Phoenix Meadows Alternative could result in significant adverse construction impacts related to traffic and pedestrians. In summary, both the Proposed Project and the Phoenix Meadows Alternative would have the potential to result in significant adverse impacts to traffic, buses, and pedestrians during the operational period, and construction period impacts related to traffic and pedestrians.

Proposed Project with Passerelle Bridge Reconstruction Alternative

Description of the Proposed Project with Passerelle Bridge Replacement Alternative

This alternative would involve the replacement of the Passerelle Bridge by the City at the same time as the Proposed Project. The Passerelle Bridge is owned and maintained by NYC Parks. Although it is a City-priority to maintain and operate the Passerelle Bridge and past, adjacent projects have considered a Passerelle Bridge replacement, currently a capital project is not yet designed or funded. The following discussion analyzes with the information available the Passerelle Bridge Replacement Alternative in the event that a capital project is ready to be implemented for the Passerelle Bridge replacement at the same time of the Proposed Project. If and when there is a Passerelle Bridge replacement project, additional analysis and approval may be required.

As described in **Chapter 1, Project Description**, the Proposed Project itself does not include or require any changes to the Passerelle Bridge. The southernmost limits of the Proposed Project include a new parking structure (Area of Development C) and at-grade athletic fields, ball courts, playgrounds, and surface parking in the location of current-day surface parking lots. The Proposed Project also includes improvements to the Mets-Willets Point NYCT No.7 Train Subway Station. These Proposed Project elements maintain the existing relationship between the subway station and the Passerelle Bridge.

Therefore, this alternative would include all the components of the Proposed Project, as well as the replacement of the Passerelle Bridge. As a design for the replacement bridge has not yet been developed, for analysis purposes, the bridge replacement would include the following components:

- Replacement of the bridge structure substantially in the same location and with the same dimensions as the existing Passerelle Bridge;
- Upgrades to achieve ADA compliance; and
- Exterior improvements to the Passerelle Building to provide weather-tight structures and extend the useful life of the building as the main gateway to Flushing Meadows Corona Park.

Construction is anticipated to take 48 months, starting in March 2029 and ending in March 2032. The existing Passerelle Bridge is just under 2.6 acres. The Passerelle Bridge is an existing wood-deck bridge that extends from the southern edge of the Mets-Willets Point NYCT No. 7 Train Subway Station south to a point (approximately 800 feet long) where the existing bridge deck changes to concrete that extends south to the end of the LIRR Station. Under this Alternative, the entire existing wood-deck and concrete deck would be replaced and ADA accessible ramps would be provided. It is

anticipated that demolition and construction/rebuilding of the Passerelle Bridge would be performed in stages, allowing the full length of the Passerelle Bridge to remain open to pedestrians at all times.

South of the concrete bridge is a 1-story, curved brick buildings (collectively the "Passerelle Building") on each side of the pedestrian ramp down from the LIRR Station that house offices for NYC Parks as well as public programs and restrooms. The Passerelle Building is a little over 40,000 square feet and the central ramp portion of the Passerelle Building is 9,000-10,000 square feet. The building features a flat roof deck containing a pedestrian terrace and overlook and under this Alternative, the roof would be replaced.

Since the Passerelle Bridge is a contributing resource to the S/NR-eligible Flushing Meadows Corona Park Historic District, consultation with the New York State Historic Preservation Office (NYSHPO) would be required.

Under this alternative, all goals and objectives of the Proposed Project would be met, in addition to the independent goal and objective of restoration and accessibility improvements to the Passerelle Bridge.

History of Passerelle Bridge Reconstruction Proposals

In 2016, the New York City Department of Design and Construction (NYCDDC) issued a Request for Proposals for Preliminary and Final Design and Construction Services for the Passerelle Pedestrian Bridge, and City capital dollars were allocated for the reconstruction of the Passerelle Bridge. That work did not move forward.

In lieu of the NYCDDC project, the LaGuardia Airport (LGA) Access Improvement Project (aka AirTrain) sponsored by the Port Authority of New York and New Jersey (PANYNJ) included demolition of the Passerelle Bridge and the construction of a replacement bridge just east of the existing location, which also included connections to the proposed AirTrain station.

The LGA Access Improvement project was subject to the National Environmental Policy Act (NEPA), with the Federal Aviation Administration (FAA) serving as the NEPA lead agency. Although a Record of Decision (ROD) for the NEPA process was issued in July 2021, in 2023[6] the PANYNJ officially abandoned the project, and the FAA withdrew the ROD for the LGA Access Improvement Project. Accordingly, all approvals for FAA actions within the ROD, including the replacement of the Passerelle Bridge, were also withdrawn.

As the Passerelle Bridge scope associated with the LGA Access Improvement Project was specifically designed to accommodate the now canceled project, it is no longer relevant, and a distinct scope, consistent with the general description above will be developed for the Passerelle Bridge Replacement Alternative, to further the City's goal and objective ensuring continuous access to and from Flushing Meadows Corona Park, Queens cultural destinations located in the park, NYCT's Mets-Willets Point subway station and LIRR's Willets Point commuter rail station.

Passerelle Bridge Replacement Alternative Compared to the Proposed Project

Since the only difference between the Proposed Project and the Passerelle Bridge Replacement Alternative would be the replacement of the Passerelle Bridge described above, the only impacts of

[6] Federal Register: Notice of Withdrawal of the Record of Decision for the LaGuardia Airport Access Improvement Project

this Alternative that would differ from those of the Proposed Project would be those associated with construction and operation of the reconstructed Passerelle Bridge. These include:

- Long-term (operation-related) impacts to historic and cultural resources
- Short-term (construction-related) impacts

Historic and Cultural Resources

This alternative would entail demolishing and replacing the Passerelle Bridge. As detailed in **Chapter 7, Historic and Cultural Resources**, the Passerelle Bridge is itself a S/NR-eligible contributing resource to the Flushing Meadows Corona Park Historic District, in addition to the following associated structures and features: the Pavilion on the Passerelle Bridge; the Willets Point Subway Station and IRT Interlocking Tower; the Main Gate Entrance; and the Passerelle Buildings at the Main Entrance. The Passerelle Bridge connects the portion of Flushing Meadows Corona Park south of the LIRR tracks with the Mets-Willets Point Station at Roosevelt Avenue.

Although this alternative would include improvements to accessibility and pedestrian flow associated with the bridge, altering the bridge's current condition would result in a significant adverse impact to historic and cultural resources. Depending upon its final scope and design, including, for example, the selection and grade of materials to be used in the reconstruction and the extent to which they match those of the existing bridge, a replacement of the Passerelle Bridge could also have the potential to impact some of the additional contributing historic features and structures listed above by altering their setting and relationship to the Passerelle Bridge. The bridge replacement would require review by Parks, NYSHPO and the New York City Landmarks Preservation Commission and the potential for design changes and mitigation measures would need to be explored to the extent necessary.

Construction

The potential for construction impacts and potential cumulative impacts will be assessed based on a staging plan that would be developed in the future. It is therefore conservatively assumed at this time that there would be significant adverse impacts during the construction period and that potential mitigation measures will be explored in the future as construction details become available.

As described in **Chapter 7, Historic and Cultural Resources**, during the construction period, the Proposed Project could impact the Willets Point Subway Station and IRT Interlocking Tower from construction vibrations from the Proposed Project buildings, some of which would be located within 90 feet of these resources. In addition, the Proposed Project could have a direct impact from vibrations on the Passerelle Bridge during construction. In order to avoid or minimize impacts such as vibrations, a Construction Protection Plan (CPP) would be implemented for the Willets Point Subway Station and IRT Interlocking Tower and/or the Passerelle Bridge. Replacement of the Passerelle Bridge could potentially impact other historic resources within 90 feet during the construction period, including the Willets Point Subway Station and IRT Interlocking Tower. As with the Proposed Project, construction related to this alternative would require that a CPP be implemented to minimize the potential risk for nearby historic resources to be impacted by construction under this alternative.

Pedestrian access along the Passerelle Bridge would be restricted during construction, which could result in significant adverse impacts to pedestrian conditions. In that event, mitigation measures would need to be developed to provide alternative means of access in the area from the LIRR station to the Willets Point Subway Station during the construction period.

Based on the construction phasing, logistics, and use and duration of construction equipment, it is also possible that there could be significant adverse air quality and noise impacts during construction of the Passerelle Bridge replacement, however, like the Proposed Actions, it is assumed that emission reduction measures that are mandated by law and are common practice in large-scale NYC construction projects, and follow the requirements included in NYC Law 77 and the NYC Air Pollution Control Code, and requirements under the NYCDEP Noise Code (Section 24-228) would be undertaken during construction.

No Unmitigated Significant Adverse Impacts Alternative

According to the *CEQR Technical* Manual, when Proposed Actions would result in unmitigated significant adverse impacts, it may be appropriate to include an assessment of an alternative to the project that would not result in unmitigated impacts while achieving the Project's goals and objectives. The No Unmitigated Significant Adverse Impact Alternative identifies those modifications to the Proposed Actions that would be required to eliminate all of the Proposed Actions' unmitigated significant adverse impacts.

In order to eliminate all unmitigated significant adverse impacts, the Proposed Actions would need to be so substantially modified that the Project goals and objectives would not be realized.

~~As discussed in **Chapter 11, Water and Sewer Infrastructure** and **Chapter 23, Unavoidable Significant Adverse Impacts**, flows from the Proposed Project, which would contribute to an exceedance of the capacity of the 24-inch sanitary main and the 37th Avenue Pump Station, could result in a potential significant impact to sewer infrastructure. Additional analysis will be undertaken between the DEIS and FEIS of the hydraulic capacity of the 24-inch sewer and of the capacity of the 37th Avenue pump station. If it is confirmed that the flow levels in the With-Action condition would exceed operating capacity to an extent considered significant consistent with *CEQR Technical Manual* guidance, a significant adverse impact would occur. In that event, potential mitigations could include capacity enhancements to the 24-inch sanitary sewer and/or the pump station, or other infrastructure improvements or operational changes that would avoid the impact. Should these measures be unable to fully address the capacity shortfall, the impact would be unmitigated.~~

As discussed in **Chapter 21, Mitigation** and **Chapter 23, Unavoidable Significant Adverse Impacts,** the Proposed Project would result in significant adverse impacts to traffic and pedestrian elements that could not be fully mitigated[7]. Sensitivity analyses were conducted for the two travel modes to determine the level of reduction in the development program to eliminate these unmitigated significant transportation impacts. The sensitivity analyses were conducted at locations in the traffic and pedestrian networks where the largest deterioration of level of service resulted from the Proposed Project when compared to the No-Action condition. The analyses determined that any development increment would be expected to result in unmitigated significant adverse transportation impacts and therefore would not meet the project's goals of creating a mixed-use recreational, commercial and entertainment hub with substantial job creation and extensive public park space and amenities for community public recreation.

[7] As described in **Chapter 11, Water and Sewer Infrastructure**, since the publication of the Draft EIS, NYCDEP has coordinated with the Applicant regarding the sanitary sewer infrastructure, and it has been determined that the Proposed Project would not result in a significant adverse impact to sewer infrastructure.

The specifics for each travel mode analyzed are detailed below.

Traffic

As discussed in **Chapter 14, Transportation**, 5048 intersections were analyzed in the With-Action condition. The Proposed Project would result in significant adverse traffic impacts that could not be fully mitigated with standard traffic capacity improvement measures at fivethree intersections studied during the non-gameday weekday AM peak hour, nineseven intersections during the non-gameday weekday midday peak hour, 165 intersections during the non-gameday weekday PM peak hour, eight intersections during the non-gameday Saturday PM peak hour, 15 intersections during the gameday weekday PM peak hour, 156 intersections during the gameday Saturday PM Pre-Game peak hour, nine10 intersections during the gameday Saturday PM Post-Game peak hour, 110 intersections during the gameday Sunday midday peak hour, and 14 intersections during the gameday Sunday PM peak hour. These impacts would result from a minimal increase in vehicle trips because of prevailing background traffic conditions. Even a minimal increase in traffic and pedestrians above No-Action condition levels would be expected to result in traffic impacts that could not be mitigated.

Based on a sensitivity analysis conducted at the intersection of Roosevelt Avenue and 114th Street, the addition of just two incremental vehicles at critical movements during non-gameday weekday PM peak hour would create a significant adverse impact that could not be fully mitigated.

Therefore, any development increment larger than the No-Action development would be expected to result in unmitigated significant adverse traffic impacts.

Pedestrians

As discussed in **Chapter 14, Transportation**, 41 pedestrian elements were analyzed in the With-Action condition. The Proposed Project would result in significant pedestrian impacts that could not be mitigated at two elements during the non-gameday weekday midday peak hour, two elements during the non-gameday weekday PM peak hour, two elements during the non-gameday Saturday PM peak hour, three elements during the gameday weekday PM peak hour, five elements during the gameday Saturday PM Pre-Game peak hour, six elements during the gameday Saturday PM Post-Game peak hour, three elements during the gameday Sunday midday peak hour, and nineeight elements during the gameday Sunday PM peak hour.

Based on a sensitivity analysis performed at the east and west crosswalks at the intersection of Roosevelt Avenue and 126th Street/Seaver Way, it was determined that the Proposed Actions would require a 35 percent reduction in the development increment during the non-gameday Saturday PM peak hour and it was determined that the Proposed Actions would require a 35 percent reduction in the development increment in order to avoid unmitigated pedestrian impacts.

Given the above, there is no Unmitigated Significant Adverse Impact Alternative to the Proposed Actions any larger than the No-Action Alternative.