HERKIMER-WILLIAMS EIS
Chapter 21: Alternatives

A. INTRODUCTION

As described in the 2021 *City Environmental Quality Review* (CEQR) *Technical Manual*, alternatives selected for consideration in an environmental impact statement are generally those that are feasible and have the potential to reduce, eliminate, or avoid significant adverse impacts resulting from a project while meeting some or all of the goals and objectives of the project. The purpose of an analysis of alternatives to a project is to provide the decision makers with the opportunity to consider practicable alternatives that are consistent with the project's purpose, and that could potentially reduce or eliminate significant adverse environmental impacts identified in the Environmental Impact Statement (EIS). As described in **Chapter 1, "Project Description,"** the Proposed Actions would facilitate the development of five new buildings and potentially, a small retail kiosk on the projected development sites in the Project Area. The new mixed-use development on the projected development sites would contain a combined total of approximately 1,589,202 gross square feet (gsf), including approximately 435,766 gsf of commercial office space, 113,760 gsf of commercial retail space, 834,763 gsf of residential space (1,112 dwelling units [DUs]), 22,985 gsf of community facility (house of worship) space, and 98,483 gsf of light industrial space for Use Groups III-X, as well as approximately 174 accessory parking spaces (approximately 83,445 gsf) and 20,080 sf of publicly accessible area ("PAA") space (the "Proposed Development"). Pursuant to the City's MIH program, up to 20-30 percent or approximately 222-334 units would be designated as permanently affordable at an average of 40-80 percent area median income (AMI) depending on the selected Option (the Applicant intends to map both Options 1 and 2). In addition to the approximately 222-334 permanently affordable units pursuant to MIH, the Applicant intends to work with the New York City Department of Housing and Preservation (HPD) to allow the proposed DUs in the Proposed Development to be designated as 100 percent affordable units as well, pursuant to available subsidy.

A Reasonable Worst Case Development Scenario (RWCDS) has been established for the Proposed Actions for an analysis year of 2036. In the future with the Proposed Actions, the Proposed Actions would be approved, allowing the Applicant to construct the Proposed Development on the projected development sites in the Project Area. In addition, a second RWCDS (the "Alternate Community Facility Scenario") will be assessed for conservative analysis purposes, where deemed appropriate for any technical area in the EIS where this development scenario serves as the more conservative RWCDS compared to the Proposed Development. The Alternate Community Facility Scenario would include five new buildings and potentially, a small retail kiosk in the Project Area containing a combined total of approximately 1,620,348 gsf, including approximately 688,065 gsf of residential uses (911 DUs), 461,749 gsf of commercial office space, 137,026 gsf of commercial retail space, 114,691 gsf of community facility space (including 22,985 gsf of house of worship space and 91,706 gsf of academic university space), and 111,933 gsf of light industrial space for Use Groups III-X, as well as approximately 200 accessory parking spaces (approximately 106,884 gsf) and 20,080 sf of PAA space. Pursuant to the City's MIH program, up to 20-30 percent or 182-273 units would be designated as permanently affordable at an average of 40-80 percent AMI depending on the selected Option (as mentioned, the Applicant intends to map both Options 1 and 2). Like the Proposed Development, the Applicant intends to work with HPD to allow the proposed DUs in the Alternate Community Facility Scenario to be designated as 100 percent affordable units, pursuant to available subsidy.

This chapter considers in detail the following two alternatives to the Proposed Actions:

- A No-Action Alternative, which is mandated by CEQR and the State Environmental Quality Review Act (SEQRA) and is intended to provide the lead and involved agencies with an assessment of the expected environmental impacts of no action on their part (i.e., no zoning changes).

- A No Unmitigated Significant Adverse Impacts Alternative, which considers a development scenario that would not result in any identified significant, unmitigated adverse impacts.

B. PRINCIPAL CONCLUSIONS

No-Action Alternative

The No-Action Alternative examines future conditions in the Project Area but assumes the absence of the Proposed Actions (i.e., none of the discretionary approvals proposed as part of the Proposed Actions would be adopted). Under the No-Action Alternative by 2036, it is anticipated that the Project Area would remain as under existing conditions. Overall, it is assumed that the Project Area would be occupied by approximately 9,000 gsf of office space, approximately 12,904 gsf of community facility (house of worship) space, approximately 50,422 gsf of light industrial space, and approximately 31 parking spaces. The technical chapters of this EIS have described the No-Action Alternative as "the Future Without the Proposed Actions."

The significant adverse impacts anticipated to occur related to transportation~~, mobile source air quality,~~ and construction transportation that would occur with the Proposed Actions would not occur under the No-Action Alternative. However, the No-Action Alternative would not meet the goals of the Proposed Actions. The benefits expected to result from the Proposed Actions — including promoting affordable housing development by permitting residential uses and establishing an MIH Area within a portion of the Project Area, encouraging economic development by increasing permitted community facility, commercial, and manufacturing densities in a transit accessible area of the City, creating pedestrian-oriented streets through active ground floor retail uses and PAA space — would not be realized under this alternative, and the No-Action Alternative would fall short of the objectives of the Proposed Actions.

No Significant Adverse Impacts Alternative

The No Significant Adverse Impacts Alternative examines a scenario in which the density and other components of the Proposed Actions are modified to avoid the unmitigated significant adverse impacts associated with the Proposed Actions, which include impacts related to transportation~~, mobile source air quality,~~ and construction transportation. This alternative considers a development scenario that would not result in any significant adverse impacts that could not be fully mitigated. However, to eliminate all identified unmitigated significant adverse impacts, the Proposed Actions would have to be modified to a point where the principal goals and objectives of the Proposed Actions would not be fully realized.

C. NO-ACTION ALTERNATIVE

The No-Action Alternative examines future conditions within the Project Area but assumes the absence of the Proposed Actions. Under the No-Action Alternative, there would be no changes to zoning (i.e., zoning map and text amendments) in the Project Area, no Large-Scale General Development (LSGD) and retail special permits, and no combination acquisition and site selection of real property. Conditions under

this alternative are similar to the "Future without the Proposed Actions" described in the preceding chapters, which are compared in the following sections to conditions under the Proposed Actions.

Under the No-Action Alternative, it is anticipated that the Project Area would remain as under existing conditions. Overall, it is assumed that the Project Area would be occupied by approximately 9,000 gsf of office space, approximately 12,904 gsf of community facility (house of worship) space, approximately 50,422 gsf of light industrial space, and approximately 31 parking spaces.

The effects of the No-Action Alternative in comparison to those of the Proposed Actions are provided below.

Land Use, Zoning, and Public Policy

Under the No-Action Alternative, it is anticipated that the Project Area would remain as under existing conditions. Overall, it is assumed that the Project Area would be occupied by approximately 9,000 gsf of office space, approximately 12,904 gsf of community facility (house of worship) space, approximately 50,422 gsf of light industrial space, and approximately 31 parking spaces. As such, the No-Action Alternative would not result in changes to land use and in the Project Area.

Unlike the Proposed Actions, the No-Action Alternative would not improve land use conditions in the Project Area because it would not introduce affordable housing opportunities and new community facility, commercial, and manufacturing uses to the Project Area, nor would it provide new PAA space. The No-Action Alternative would be less supportive of public policies articulated in *OneNYC 2050*, *New York Works*, *Get Stuff Built*, *Housing Our Neighbors: A Blueprint for Housing and Homelessness*, and *Where We Live NYC Plan* that aim to expand the City's housing supply, including the supply of available affordable housing, provide new publicly accessible open space, and promote economic development through the provision of new space for community facility, commercial, and light industrial uses in a transit accessible area of the City.

While the No-Action Alternative does not achieve the beneficial land use changes that would result with the Proposed Actions, neither the Proposed Actions nor the No-Action Alternative would result in significant adverse impacts related to land use, zoning, and public policy.

Socioeconomic Conditions

Neither the No-Action Alternative nor the Proposed Actions would be expected to have a significant adverse impact on socioeconomic conditions. Similar to the Proposed Actions, the No-Action Alternative would not result in direct or indirect residential or business displacement.

Unlike the Proposed Actions, the M1-2 zoning district would remain under the No-Action Alternative, and no market-rate and affordable housing could be constructed in the Project Area. As a result, the benefits of the Proposed Actions, including new permanently affordable housing pursuant to the City's MIH program, would not be realized under the No-Action Alternative.

Community Facilities and Services

The No-Action Alternative would not introduce any new residents and, therefore, would not result in any increase in demand on area community facilities and services. Neither the Proposed Actions nor the No-Action Alternative would result in direct impacts to community facilities and services nor indirect impacts

to public schools, library services, publicly funded early childhood programs, and police, fire, and emergency medical services.

Open Space

Like the Proposed Actions, the No-Action Alternative would not result in any direct or indirect impacts on open space resources. The No-Action Alternative would not introduce any new residents or workers to the Project Area, and therefore, unlike the Proposed Actions, would not increase demand for open space resources within the non-residential and residential study areas. However, whereas the Proposed Actions are anticipated to introduce approximately 20,080 sf of PAA space to the Project Area, the No-Action Alternative would not create any new publicly accessible open space.

Shadows

Neither the No-Action Alternative nor the Proposed Actions would result in significant adverse shadows impacts. Under the No-Action Alternative, no new buildings nor structures would be built within the Project Area, and therefore no new incremental shadows would be cast on sunlight-sensitive resources in the surrounding area.

Historic and Cultural Resources

Under the No-Action Alternative, no changes to the existing development in the Project Area is expected to occur. The No-Action Alternative would not result in in-ground disturbance or alterations to existing buildings or structures, and no changes to any publicly accessible views of surrounding historic resources would occur because of the No-Action Alternative. Therefore, the No-Action Alternative would not result in any significant adverse impacts to archaeological or architectural resources, like the Proposed Actions.

Urban Design and Visual Resources

Like the Proposed Actions, the No-Action Alternative would not have significant adverse impacts on urban design and visual resources. Under the No-Action Alternative, all the existing buildings and structures within the Project Area would remain as under existing conditions, and no new buildings nor PAA space would be introduced. However, the urban design benefits associated with the Proposed Actions – improving the pedestrian experience in the Project Area through the redevelopment of a largely inactive and underutilized area with mixed-use development containing active ground-floor uses and publicly accessible open spaces – would not be realized under the No-Action Alternative.

Hazardous Materials

Like the Proposed Actions, the No-Action Alternative would not result in significant adverse hazardous materials impacts. Under the No-Action Alternative, no new development would occur within the Project Area, and therefore no in-ground disturbance would occur. Under the Proposed Actions, a hazardous materials (E) designation would be assigned to the lots comprising the projected development sites within the Project Area to ensure that development under the Proposed Actions would not result in significant adverse hazardous materials impacts. In either case, significant impacts with respect to hazardous materials are not expected under the Proposed Actions or the No-Action Alternative.

Water and Sewer Infrastructure

In the No-Action Alternative, no new development would occur within the Project Area and therefore demands on water and sewer infrastructure would be less than under the Proposed Actions. Nevertheless, neither the Proposed Actions nor the No-Action Alternative would result in any significant adverse impacts on the City's water and sewer infrastructure.

Solid Waste and Sanitation Services

In the No-Action Alternative, no new development would occur within the Project Area and therefore demand for solid waste and sanitation services would be less than under the Proposed Actions. Nevertheless, neither the Proposed Actions nor the No-Action Alternative would result in any significant adverse impacts on solid waste and sanitation services.

Energy

In the No-Action Alternative, no new development would occur within the Project Area and therefore demands for energy would be less than under the Proposed Actions. Nevertheless, neither the Proposed Actions nor the No-Action Alternative would result in any significant adverse impacts on energy.

Transportation

As discussed below, unlike the Proposed Actions, the No-Action Alternative would not result in any significant adverse impacts with respect to transportation. Unlike the Proposed Actions, the No-Action Alternative would not result in the potential for significant adverse traffic impacts to 14, ~~13~~14, ~~16~~15, and ~~14~~ 13 intersections in the weekday AM, midday, and PM peak hours, and Saturday peak hour, respectively. In addition, the Proposed Actions' significant adverse transit impacts to ~~two~~ one platform stair~~s~~ at the Broadway Junction (A/C/J/L/Z) station complex in ~~one or more~~the PM peak hour~~s~~ would not occur with the No-Action Alternative. Furthermore, the Proposed Actions' significant adverse pedestrian impacts to four sidewalks, three crosswalks, and five corner areas in one or more peak hours would not occur with the No-Action Alternative. Like the Proposed Actions, any shortfall in on-street or off-street public parking capacity under the No-Action Alternative is unlikely to be considered significant due to the magnitude of available alternative modes of transportation.

In the No-Action Alternative, traffic, transit, pedestrian, and parking demand in the study area would increase because of background growth and other development projects likely to occur in the vicinity of the Project Area.

Traffic

Independent of the Proposed Actions, traffic levels of service (LOS) at many locations in the study area would experience congested conditions in the future. Under the No-Action Alternative, a total of ~~15~~ 14 analyzed intersections (12 signalized and ~~three~~ two unsignalized) would have at least one congested lane group in one or more peak hours; this is compared with a total of ~~16~~ 19 analyzed intersections (~~11~~ 14 signalized and five unsignalized) with at least one congested lane group in one or more peak hours under the Proposed Actions. There would be no intersections with significant adverse traffic impacts under the No-Action Alternative compared with 14, ~~13~~14, ~~16~~15, and ~~14~~ 13 impacted intersections during the weekday AM, midday and PM, and Saturday peak hours, respectively, under the Proposed Actions.

Transit

Subway Stations

Under the No-Action Alternative, the analyzed subway station complex, Broadway Junction (A/C/J/L/Z), would experience an increase in demand because of background growth and future developments anticipated in the vicinity of the Project Area. All analyzed stairs at the Broadway Junction Subway Station complex would operate at an acceptable LOS C or better in both the AM and PM peak hours with the exception of four stairs, of which three and one are expected to operate with LOS D or worse during the AM and PM peak hours, respectively. During the AM peak hour, stairs P3/P4 and U8 are expected to operate at LOS D and stairs U2/U4 are expected to operate at LOS E under the No-Action condition. During the PM peak hour, the new platform stairs to the southbound A/C platform are expected to operate at LOS F under the No-Action condition. Furthermore, all analyzed fare arrays at the Broadway Junction Subway Station complex would continue to operate at an acceptable LOS A in both the AM and PM peak hours under the No-Action condition, and all analyzed escalators at the Broadway Junction Subway Station complex would operate at an acceptable LOS C or better in both the AM and PM peak hours. By comparison, under the Proposed Actions, significant adverse transit impacts would occur to ~~two~~ one platform stair~~s~~ at the Broadway Junction (A/C/J/L/Z) station complex in ~~one or more~~the PM peak hour~~s~~. The Proposed Actions' significant adverse impacts to ~~two~~ one platform stair~~s~~ at the Broadway Junction (A/C/J/L/Z) station complex in one or more peak hours would not occur under the No-Action Alternative.

Subway Line Haul

Under the No-Action Alternative, subway trains serving the Project Area will experience increased ridership through their maximum load points as a result of background growth and new development. Like the Proposed Actions, no subway route would experience significant adverse line haul impacts under the No-Action Alternative.

Bus

Under the Proposed Actions, no bus route operating in proximity to the Project Area is expected to experience an incremental increase of 50 or more peak hour trips in one direction. Under the No-Action Alternative, demand on local bus routes is expected to increase as a result of background growth and new development. However, like the Proposed Actions, no bus route would experience significant adverse impacts under the No-Action Alternative.

Pedestrians

Under the No-Action Alternative, pedestrian volumes along analyzed sidewalks, crosswalks, and corner areas are expected to increase compared with existing levels as a result of background growth as well as demand from new development.

Sidewalks

Under the No-Action Alternative, all analyzed sidewalks are expected to operate at an acceptable LOS C or better in all peak hours except for the south sidewalk along Herkimer Street between Williams Place and East New York Avenue, which is expected to operate at a LOS E in the weekday midday peak hour under the No-Action Alternative. This compares to significant adverse impacts at four analyzed sidewalks in one or more peak hours because of the Proposed Actions, which would not occur under the No-Action Alternative.

Crosswalks

Under the No-Action Alternative, all analyzed crosswalks are expected to operate at an acceptable LOS A in all peak hours. The Proposed Actions' significant adverse impact to three analyzed crosswalks in one or more peak hours would not occur under the No-Action Alternative.

Corners

Under the No-Action Alternative, all analyzed corner areas are expected to operate at an acceptable LOS A in all peak hours. The Proposed Actions' significant adverse impact to five analyzed corners in the weekday PM and Saturday peak hours would not occur under the No-Action Alternative.

Parking

Under the No-Action Alternative, it is anticipated that demand for public parking would increase due to new development and general background growth. Like the Proposed Actions, any potential parking shortfalls under the No-Action Alternative is unlikely to be considered significant per 2021 *CEQR Technical Manual* guidance due to the magnitude of available alternative modes of transportation.

Air Quality

Mobile Sources

In the No-Action Alternative, emissions from traffic demand in the study area would increase because of background growth and other development projects likely to occur in the vicinity of the Project Area. As described in **Chapter 14, "Air Quality,"** under the No-Action Alternative, no exceedances of the national ambient air quality standards would occur for carbon monoxide or particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). Significant adverse mobile source impacts are therefore not anticipated under the No-Action Alternative.

Stationary Sources

In the No-Action Alternative, it is anticipated that no new development would occur within the Project Area. Accordingly, emissions in the area from heating and hot water systems would be similar to existing conditions, which would be less than in the future with the Proposed Actions. As under the Proposed Actions, significant adverse stationary source air quality impacts are not anticipated under the No-Action Alternative.

Greenhouse Gas Emissions and Climate Change

With no new development within the Project Area, the No-Action Alternative would have less energy use than the Proposed Actions and would therefore result in fewer carbon dioxide equivalent (CO_2e) emissions per year. Neither the Proposed Actions nor the No-Action Alternative would result in significant adverse greenhouse gas (GHG) emissions or climate change impacts.

Noise

Neither the Proposed Actions nor the No-Action Alternative would result in significant adverse noise impacts. In the No-Action Alternative, traffic volumes would increase in the surrounding area due to general background growth and trips associated with new development that would be independent of

the Proposed Actions. These increases in traffic would result in small changes in noise levels compared to existing conditions but, at most locations and during most time periods, the increases in $L_{eq(1)}$ noise levels would be imperceptible. Furthermore, as the No-Action Alternative would not include noise sources or receptors created by the Proposed Actions, it is not warranted to assess the potential for significant adverse noise impacts.

Public Health

Under the No-Action Alternative, no unmitigated significant adverse impacts would occur in the areas of hazardous materials, air quality, noise, or construction, and thus there would be no significant adverse public health impacts under the No-Action Alternative.

Neighborhood Character

According to the 2021 *CEQR Technical Manual*, a project could have a significant adverse neighborhood character impact if it would have the potential to affect the defining features of the neighborhood, either through the potential for a significant adverse impact in any relevant technical area, or through a combination of moderate effects in those technical areas. Like the Proposed Actions, the No-Action Alternative would not cause significant adverse impacts in the areas of land use, zoning, and public policy; socioeconomic conditions; open space; shadows; historic and cultural resources; urban design and visual resources; transportation; or noise. As described in **Chapter 18, "Neighborhood Character,"** the significant adverse transportation impacts of the Proposed Actions would not affect any defining feature of neighborhood character, nor would a combination of moderately adverse effects affect such a defining feature.

Neither the Proposed Actions nor the No-Action Alternative would result in significant adverse impacts to neighborhood character. However, the improvements to neighborhood character that would occur under the Proposed Actions – such as the introduction of affordable housing options, new community facility, commercial, and light industrial space, and publicly accessible open space – would not occur under the No-Action Alternative.

Construction

As described in **Chapter 19, "Construction,"** the Proposed Actions would result in significant construction-related transportation impacts. However, no construction is anticipated in the Project Area under the No-Action Alternative. Therefore, no significant adverse construction-related impacts would occur under the No-Action Alternative.

D. NO SIGNIFICANT ADVERSE IMPACTS ALTERNATIVE

According to the 2021 *CEQR Technical Manual*, when a project would result in significant adverse impacts, it is often CEQR practice to include an assessment of an alternative to the project that would result in no significant adverse impacts. Based on the analyses presented in other chapters of this EIS, there is the potential for the Proposed Actions to result in unmitigated significant adverse impacts with respect to transportation~~,~~ during operational and construction conditions~~, as well as mobile source air quality~~. This alternative identifies those measures that would have to be taken to eliminate all the Proposed Actions' significant adverse impacts.

To determine possible scenarios under this alternative, a screening analysis was used to define the level at which a given building program would trigger any of the 2021 *CEQR Technical Manual* thresholds at which impacts in the aforementioned technical areas may occur. The screening analysis found that the density of this alternative must be substantially less than with the Proposed Actions. This alternative would have similar or lesser effects on the CEQR technical areas analyzed in the EIS relative to the Proposed Actions, but unlike the Proposed Actions, this alternative would avoid all identified significant adverse impacts. However, as outlined below, to eliminate all significant adverse impacts, the Proposed Actions would have to be modified to a point where their principal goals and objectives would not be realized.

Transportation

As presented in **Chapter 20, "Mitigation,"** the Proposed Actions would result in significant adverse traffic impacts at 16 study area intersections during one or more analyzed peak hours; specifically, 14 intersections during the weekday AM peak hour, ~~13~~ 14 intersections during the midday, ~~16~~ 15 intersections during the PM, and ~~14~~ 13 intersections the Saturday peak hour. Implementation of traffic engineering improvements such as signal timing changes ~~and installation of new traffic signals~~ would provide mitigation for some of the anticipated traffic impacts. Specifically, the significant adverse impacts would be fully mitigated at two lane groups in the weekday AM peak hour, ~~one~~ two lane groups in the midday, zero lane groups in the PM, and zero lane groups in the Saturday peak hour. Intersections where all impacts would be fully mitigated would total two, ~~one~~two, zero, and zero during these same periods, respectively. In total, impacts to one or more lane groups would remain unmitigated in one or more peak hours at ~~16~~ 15 intersections.

Because of existing congestion at a number of these intersections, even a minimal increase in traffic would result in unmitigated impacts. Specifically, in the No-Action condition, a total of ~~15~~ 14 intersections would have at least one congested lane group in one or more peak hours, and a total of ~~eight~~nine, seven, 10, and ~~seven~~ 10 intersections would have one or more lane groups operating at or over capacity in the weekday AM, midday, and PM, and Saturday peak hours, respectively. Small increases in incremental traffic volumes would result in significant adverse impacts that could not be fully mitigated. Therefore, no reasonable alternative could be developed to completely avoid such impacts without substantially compromising the Proposed Actions' stated goals.

~~Air Quality~~

~~As described in **Chapter 14, "Air Quality,"** the Proposed Actions would result in a potential significant adverse air quality impact related to the $PM_{2.5}$ the annual *de minimis* criterion at one of the intersection sites analyzed. Based on the magnitude of the predicted $PM_{2.5}$ incremental concentrations, a substantial reduction in project-generated traffic would be required to eliminate the predicted impacts. This would require a significant reduction in density on the projected development sites in the Project Area. Therefore, no reasonable alternative could be developed to completely avoid such air quality impacts without substantially compromising the Proposed Actions' stated goals. Between certification of the DEIS and publication of the FEIS, additional refinements to the analysis will be performed which is expected to determine that the identified threshold for a *de minimis* impact related to mobile source annual average $PM_{2.5}$ increments will not be met. Additional modeling of $PM_{2.5}$ concentrations (Grid Analysis) will be performed using more comprehensive analysis procedures to determine the magnitude and extent of neighborhood-scale $PM_{2.5}$ impacts from mobile sources. Other updates may include the use of newer vehicle emissions model data and projections. It is anticipated that the analysis accounting for these~~

~~additional data points will conclude that $PM_{2.5}$ concentrations as a result of the Proposed Actions fall below the annual *de minimis* criteria thresholds, and consequently the identified impacts related to mobile sources would not occur. If unmitigated air quality impacts remain, the FEIS will assess the levels of traffic associated with a reduced development that would not result in unmitigated significant adverse air quality impacts.~~