EXECUTIVE SUMMARY

Introduction

Richmond SI Owner LLC, the project Applicant, seeks a series of discretionary land use actions including a zoning map amendment, zoning text amendments, and a special permit (the "Proposed Actions") from the City Planning Commission (CPC) to facilitate the development of a mixed-use project comprising residential and commercial uses, open space, and accessory parking (the "Proposed Development") in the St. George neighborhood of Staten Island, Community District 1 (see Figure 1).

The Proposed Actions would facilitate the development of 919,442 gross square feet (gsf) of floor area within four buildings across two development sites. The Applicant's site ("Projected Development Site 1") would be developed with three buildings totaling 801,594 gsf. The Applicant also would develop an approximately 7,790 square foot (sf) privately owned public space next to the intersection of Stuyvesant Place and Hamilton Avenue. An additional site that is not controlled or under ownership of the Applicant ("Projected Development Site 2," see Figure 2) is projected to be developed as a result of the Proposed Actions. The Proposed Actions are subject to City Environmental Quality Review (CEQR). The New York City Department of City Planning (DCP), acting on behalf of the City Planning Commission (CPC), is the lead agency for the environmental review.

Background and Existing Conditions

Project Area

The "Project Area" is bound by Richmond Terrace to the north and east, Hamilton Avenue to the south, a distance of 185 feet west of Stuyvesant Place and Richmond Terrace to the south and west, and Nicholas Street to the west. The Project Area contains Block 12, Lot 1, Block 13 Lots 60, 68, 71, 73, 82, 92, and 100, and portions of Block 13 Lots 8, 116, and 119 (see Figure 3). The Block 13 portion of the Project Area is in the Special Hillsides Preservation District, and the Block 12 portion is outside any special purpose districts. An R6 district is mapped across the Project Area with a C2-2 commercial overlay district within 100 feet of Richmond Terrace and Stuyvesant Place. Block 12, Lot 1 is also zoned R6 with a C2-2 overlay. Figure 4 shows the Special St. George District (SG) is across Hamilton Avenue and Richmond Terrace from the Project Area. The Project Area includes two projected development sites.

Figure 1: Regional Location Map



Figure 2: Project Area Map

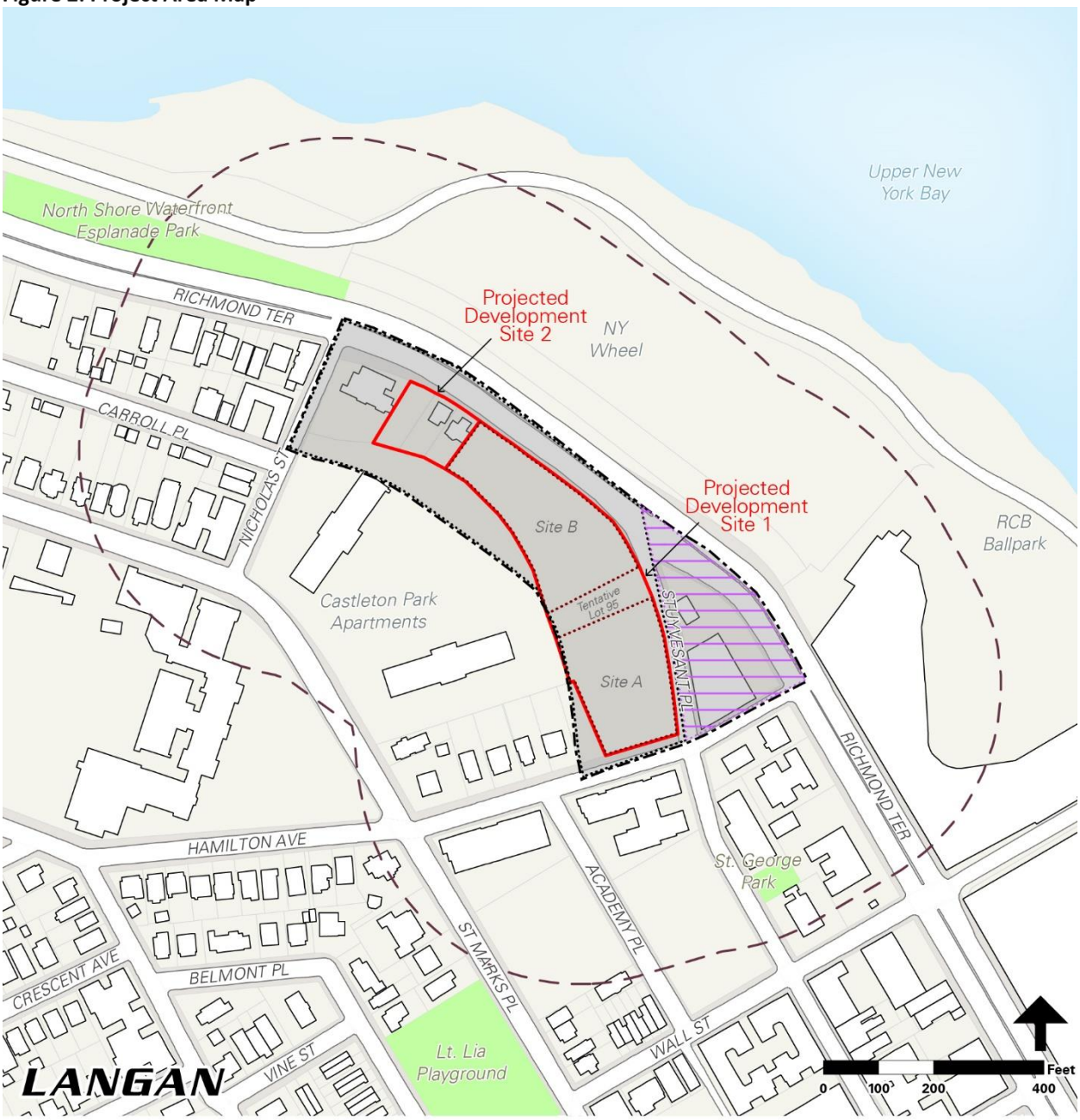
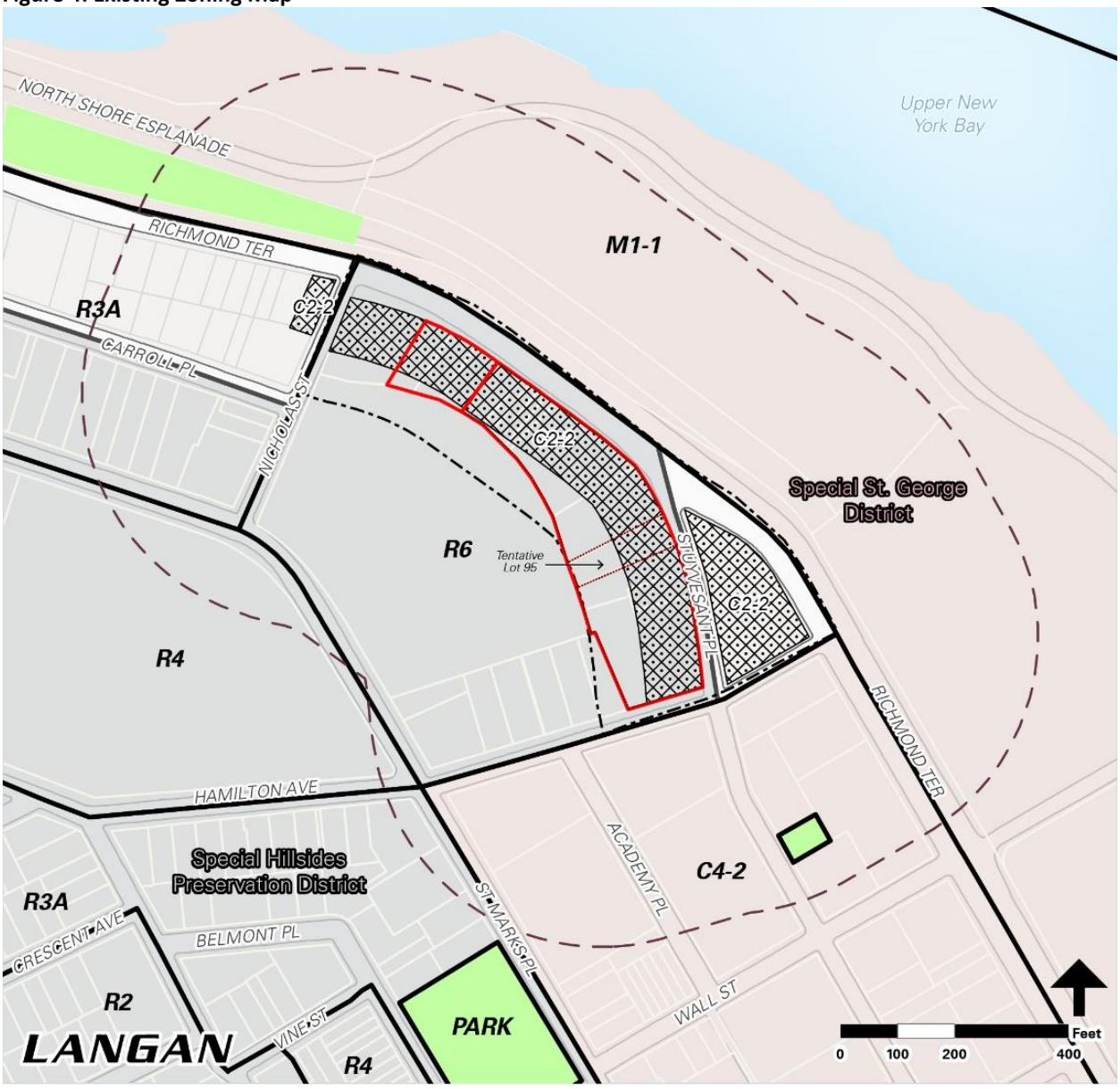


Figure 3: Tax Map



* A C2-4 commercial overlay district is proposed within 100 feet of Richmond Terrace and Stuyvesant Place within the proposed R7-3 district

Figure 4: Existing Zoning Map



Development Sites

The Reasonable Worst Case Development Scenario (RWCDS) for this project established that there would be two "projected development sites" as a result of the Proposed Actions. Projected Development Site 1 is owned by the Applicant and comprises two zoning lots under ownership of the Applicant: Site A and Site B. Site A comprises Block 13, Lot 100, and has 39,771 square feet (sf) of lot area. It is a vacant corner lot and has street frontage along Stuyvesant Place to the east and along Hamilton Avenue to the south. Site B comprises Block 13, Lots 82 and 92, and has 49,530 sf of lot area. It is an irregular interior lot with street frontage only along Richmond Terrace. Site B is vacant except for scattered vegetation and remnants of building foundations on Lot 82.

Sites A and B are bisected by Block 13, Lot 8 (the "Castleton lot"), a 209,088-sf irregular lot with frontage along Stuyvesant Place, St. Marks Place, and Nicholas Street. The Castleton lot contains the Castleton Park Apartments, which comprise two multi-family residential height factor buildings, an accessory parking garage, and private recreation areas. The portion of the Castleton lot nearest Stuyvesant Place is a panhandle shape that separates the Site A and Site B portions of Projected Development Site 1 ("Tentative Lot 95"). Independent of the Proposed Actions, the Applicant will acquire the panhandle portion of the Castleton lot, the area within 185 feet of Stuyvesant Place (9,428 sf). The acquisition would also allow Projected Development Site 1 to be one zoning lot in the With-Action Condition (but not the No-Action Condition because the open space is required to meet the height factor requirements of R6 on the Castleton lot).

Street widening is mapped along the Stuyvesant Place frontage of Site A and the approximately 50-foot frontage of the Castleton Lot along Stuyvesant Place. The area mapped for street widening includes 185.2 sf of the Castleton Lot, and 1,474.45 sf of Lot 100.

Projected Development Site 2 is to the west of Site B and comprises Block 13, Lots 68, 71, 73. Lot 68 is vacant, and Lots 71 and 73 are each listed for sale and are each developed with one two-family house. Projected Development Site 2 is not under control of the Applicant.

The projected development sites generally slope up from lower elevations along Richmond Terrace frontage to higher elevations to the west. The entirety of both projected development sites are in the Special Hillsides Preservation District (see Figure 4).

Other Lots

Lot 60 is developed with a 58,795 gsf multi-family residential building, "The View," which has 40 dwelling units (DUs) and ground floor retail. Along Hamilton Avenue, Lots 116 and 119 are partially within the Project Area; Lot 116 is vacant and Lot 119 contains a two-family detached house.

Block 12 Lot 1 contains two commercial buildings totaling 17,500 gsf and accessory parking areas that are accessed from Richmond Terrace and Stuyvesant Place. The eastern building contains office space, while the western building is used as an eating and drinking establishment. The site slopes from its lower elevations along Richmond Terrace to its highest elevations along Stuyvesant Place. The change in elevation allows a rooftop parking area to be accessed from Stuyvesant Place.

Neighborhood Context

Residential uses are located to the south and west of the Project Area in R3A, R4, and C4-2 districts. These residential uses are primarily one- and two-family detached residences

constructed largely between 1900 and 1930. Multi-family elevator buildings and multi-family walk-up buildings are present in the Study Area and are primarily along Richmond Terrace, Hamilton Avenue, Nicholas Street, and St. Marks Place. Several multi-family buildings exist in the Study Area's R3A district, a district that permits only one- and two-family detached or zero lot line (semidetached) housing types and community facility uses.

In the far west of the Study Area is Curtis High School, a large high school with 2,586 enrolled students. Commercial uses are along Richmond Terrace in the Study Area and consist of local retail and office space. Several institutional uses, including the New York City Police Department 120th Precinct, the Staten Island Family Court, and the Staten Island Museum, are in the south of the Study Area. To the north of the Project Area and across Richmond Terrace is the site of the dormant NY Wheel project. The site has an operating multi-level parking facility; other commercial components are not complete and not actively under construction. To the north of the NY Wheel site is the St. George Waterfront Esplanade, City-owned waterfront open space. In the very east of the Study Area is the Richmond County Bank Ballpark. Just beyond the ballpark and outside the Study Area is the recently completed Empire Outlets, an outlet mall with several privately-owned publicly accessible open spaces, underground parking, and a hotel.

The Project Area is approximately one-quarter mile northwest of the St. George Terminal, which is Staten Island's main transportation hub. Connections are available at the terminal between the Staten Island Ferry, the Staten Island Railroad, and MTA Bus routes. Along Richmond Terrace, the Study Area is served by the S44 and S94 bus lines with service between St. George and the Staten Island Mall and the S40 and S90 bus lines with service between St. George and Goethals Road North. The area is also planned to be served by an expansion of the fast ferry network with a new ferry landing at Wall Street, approximately 1,000 feet east of the Project Area.

Within the Study Area, there are R3A, R4, C4-2, and M1-1 zoning districts. The R3A zoning district is to the northwest and southwest of the Project Area. In the west of the Study Area is an R4 zoning district between St. Marks Place and Hamilton Avenue. A C4-2 commercial zoning district is to the south of the Project Area and an M1-1 zoning district is to the east of the Project Area, across Richmond Terrace along the waterfront.

The Special St. George District is located to the south and east of the Project Area, while the Special Hillsides Preservation District is mapped to the north and west (and across the Block 13 portion of the Project Area).

Special St. George District

The Special St. George District is mapped conterminously with the C4-2 and M1-1 zoning districts within the Study Area. The goals of the Special St. George District are:

1. To build upon St. George's existing strengths as a civic center, neighborhood transit hub by providing rules that will bolster a thriving, pedestrian-friendly business and residence district;

1. To establish zoning regulations that facilitate the continuous ground floor retail and the critical mass needed to attract and sustain a broader mix of uses;

2. To require a tall, slender building form that capitalizes on St. George's hillside topography and maintains waterfront vistas;

3. To encourage the reuse and reinvestment of vacant office buildings;

4. To accommodate an appropriate level of off-street parking while reducing its visual impact; and

5. To promote the most desirable use of land and building development in accordance with the District Plan for St. George and thus conserve the value of land and buildings and thereby protect the City's tax revenues.

The portion of the Special St. George District within the Study Area west of Richmond Terrace is the Upland Subdistrict. Developments in the Upland Subdistrict must abide by special height and setback requirements that supersede those of the underlying C4-2 zoning district. New developments in the Upland Subdistrict are limited to a height of 200 feet, and special tower rules are designed to facilitate slender towers and allow for views towards Upper Bay as well as the Brooklyn and Manhattan skylines.

East of Richmond Terrace in the Study Area is the North Waterfront Subdistrict, which was created as part of the St. George Waterfront Redevelopment Project (New York Wheel and Empire Outlets, CEQR No. 13SBS001R). The subdistrict established required view corridors and a new CPC special permit available for developments that meet certain conditions. The required view corridors are outside of the Study Area along the prolongations of St. Peter's Place, Wall Street, and the sightline between Borough Hall and Lower Manhattan across the Empire Outlets site and Upper Bay.

The Special St. George District modifies underlying parking and bulk requirements in C4-2 districts. Within these districts, accessory parking is required at a rate of one space per DU; for income-restricted, accessory parking is required at a rate of 0.25 spaces per DU. For most commercial uses, the parking regulations of the C4-3 district apply. Special bulk provisions allow up to 3.4 floor area ratio (FAR) within the Upland Subdistrict for zoning lots greater than 10,000 sf, and up to 2.2 for zoning lots with less than 10,000 sf of lot area.

Special Hillsides Preservation District

The Special Hillsides Preservation District is generally mapped west of Richmond Terrace in the north of the Study Area, and north of Hamilton Avenue and west of St. Marks Place in the south of the Study Area.

In the Special Hillsides Preservation District, new developments on Tier II sites within R1-R4 districts are permitted up to a height of 36 feet (plus permitted obstructions). In R6 districts, building heights on Tier II sites are permitted up to 70 feet (plus permitted obstructions). The special district has provisions to minimize the effects of new development on natural features such as steep slope, trees, and rock outcroppings. Preservation requirements are generally stricter on Tier II sites (sites where the average percent slope is greater than 10 percent).

Proposed Actions

To facilitate the proposed three buildings on Projected Development Site 1 (the Applicant's site), the Applicant seeks a zoning map amendment, zoning text amendments, and a CPC special permit. Specially, the Applicant proposes the following discretionary land use actions (the "Proposed Actions"):

1. A zoning map amendment to:
    - change an area bounded by Nicholas Street, Richmond Terrace, Stuyvesant Place, Hamilton Avenue and a line 185 feet from and parallel to Richmond Terrace and Stuyvesant Place between Hamilton Avenue and Nicholas Street from an R6 district with a C2-2 commercial overlay at a depth 100 feet located within the Special Hillsides Preservation District ("SHPD") to an R7-3 district with a C2-4 commercial overlay at a depth of 185 feet within the Special St. George District ("SSGD"); and

- change an area bounded by Richmond Terrace, Hamilton Avenue and Stuyvesant Place from an R6 district with a C2-2 commercial overlay to an R6 district with a C2-4 commercial overlay within the SSGD.

2. A series of zoning text amendments to the New York City Zoning Resolution (ZR), Article II including to:
   - ZR Section 21-15 to allow an R7-3 district to be mapped in the SSGD; and
   - ZR Section 23-011(c) to allow optional quality housing regulations to apply to the SSGD.
3. A series of zoning text amendments to ZR Article XII, Chapter 8 (Special St. George District) to:
   - ZR Section 128-00 (General Purposes) to include an additional goal to foster economic diversity by supporting a broad range of housing including affordable housing with the SSGD.
   - ZR Section 128-03 (District Plans and Maps) to include the Project Area within the Upland Subdistrict.
   - ZR Section 128-056 to clarify that the optional Quality Housing Program would be applicable in the R7-3 district.
   - ZR Section 128-21 (Maximum Floor Area Ratio) to establish the maximum floor area ratio of 6.0 within R7-3 Districts under the MIH program.
   - ZR Section 128-22 (Maximum Lot Coverage) to establish lot coverage of 70 percent for interior lots and 100 percent for corner lots for residential buildings in R7-3 districts.
   - ZR Section 128-30 (Height and Setback Regulations) to clarify that R7-3 is subject to regulations under this Section.
   - ZR Section 128-31 (Street Wall Location) to clarify that street wall location requirements are inapplicable in the R7-3 district.
   - ZR Section 128-33 (Maximum Base Height) to establish a maximum street wall height of 75 feet in an R7-3 district.
   - ZR Section 128-34 (Maximum Building Height) to establish a maximum building height of 185 feet or 18 stories within an R7-3 district.
   - ZR Section 128-51 (Required Off-street Parking and Loading) to make the underlying R7-3 and R6 parking and loading regulations applicable to such districts within the SSGD. R7-3 regulations would be governed by R7-2 district regulations.
   - ZR Section 128-60 (Special Approvals) to create a new special permit (ZR 128-62) to allow bulk and mandatory improvements modifications for R7-3 districts within the Upland Subdistrict.
   - Proposed ZR Section 128-62 (Special Permit for Buildings in R7-3 Districts within the Upland Subdistrict) to facilitate the Proposed Project and allow modification to bulk and mandatory improvements regulations.
4. A zoning text amendment to Appendix F (Inclusionary Housing Designated Areas and Mandatory Inclusionary Housing Areas) to establish the Project Area as a Mandatory Inclusionary Housing (MIH) area. As part of this application, both Option 1 and Option 2 are proposed to apply within the MIH area;

5. A CPC Special Permit pursuant to ZR Section 128-62 (Special Permit for Developments in R7-3 Districts within the Upland Subdistrict) modifying the following sections:

   - ZR Section 128-33 (Maximum Base Height) and ZR Section 128-34 (Maximum Building Height) to establish the height and setback regulations for R7-3 districts, which would require setbacks of 10 feet from a wide street and 15 feet from a narrow street above a maximum base height of 75 feet, and limits the overall height of the building to 185 feet or 18 stories, whichever is less.
   - ZR Section 128-31 (Rooftop Regulations) to allow the bulkheads and other equipment at the top of Building 2 to exceed 20 percent up to 38 percent of the building lot coverage in order to allow more flexibility including screening and articulation at the top of buildings.
   - ZR Section 23-47 (Minimum Required Rear Yard) to allow a waiver to the underlying rear yard requirement for a small portion where Building 1 encroaches into the rear yard required beyond a hundred feet from Hamilton Avenue varying from 9.13 feet to 10.38 feet in an area approximately 95 square feet as a result of the irregularity of the side lot and rear lot lines of the Development Site.
   - ZR Section 128-42 (Planting Areas) to facilitate the inclusion and location of the proposed publicly accessible open space at the corner of Stuyvesant Place and Hamilton Avenue and areas where the sidewalk would be widened beyond the sidewalk widening line. The publicly accessible open space would have landscaping, as well as paved areas for seating and circulation.

The special permit is only proposed for Projected Development Site 1, the Applicant-owned development site.

The Proposed Actions are classified as Unlisted, as defined under 6 NYCRR 617.4 and NYC Executive Order 91 of 1977, as amended, and are subject to environmental review in accordance with City Environmental Quality Review (CEQR) guidelines.

Purpose and Need

The Project Area serves as the northern gateway to St. George along Richmond Terrace and has the potential to serve as a northern extension of Downtown Staten Island. Currently, Sites A and B are within the Special Hillsides Preservation District, which limits the development potential of these sites. As a result, Sites A and B have remained vacant for many years. At the same time, the natural slope – a significant feature in the Special Hillsides Preservation District – within the Project Area and on Block 13 has been compromised by development such as the Castleton Park Apartments to the west. Other previous developments that have been demolished within the Project Area have also modified the hillside. The Project Area within the Special Hillsides Preservation District is atypical because:

1. The Special Hillsides Preservations District is predominately comprised of lower density (R1-R4) residential districts, districts that permit one- and two-family residences. The Project Area is in an R6 district, a medium density district that permits taller multi-family residential buildings;
2. The hillside within the Project Area has been compromised by historical and surrounding development including the parking garage of the Castleton Park Apartments, and previous development that was demolished in the late 1970s; foundations still remain on Site B;
3. The Project Area is at the very edge of the Special Hillsides Preservation District; and

4. The Project Area is across Richmond Terrace and Hamilton Avenue from the Special St. George District, a special district that encourages denser urban development and is largely within a C4-2 commercial zoning district (which has an R6 equivalent).

Development under the Proposed Actions would respond to the site's location as a gateway to Downtown Staten Island and St. George, and would capitalize on the Project Area's proximity to mass transportation. Similar to other recent development along Richmond Terrace and Bay Street - such as the Empire Outlets and Lighthouse Point – the Proposed Project would provide housing, including affordable options, active retail, and privately owned, publicly accessible open space. The proposed zoning map and text amendments – along with the special permit that would be created through the proposed text amendments – would allow the building location and massing to respond to the surrounding urban context and support a superior site plan and better urban design. Overall, the Proposed Actions are consistent with public policies such as OneNYC, Housing New York, and North Shore 2030 and would accomplish multiple land use goals for the neighborhood, borough and the City.

Proposed Development

The Applicant proposes to develop three "quality housing" buildings (the "Proposed Development") across Projected Development Site 1 (Block 13, Lots 82, 92, 100, and the portion of Lot 8 within 185 feet of Stuyvesant Place). The Proposed Development would have approximately 750 residential units, at least 30 percent of which would be permanently affordable (approximately 225 affordable units). Each building would contain retail uses below the second floor. Floor area by use is shown in Table 1.

Table 1: Proposed Development - Floor Area by Use

	GSF by Use				Program		
Building	**Residential**	**Retail**	**Parking**	**Total**	**Bldg Height (ft)***	**DU**	**Parking Spaces**
Bldg 1	311,291	9,697	66,349	387,337	293	327	
Bldg 2	235,327	1,715	0	237,042	265	295	341
Bldg 3	133,997	7,468	35,750	177,215	152	128	
TOTAL	**680,615**	**18,880**	**102,099**	**801,594**	**Up to 291**	**750**	**341**

* The building height includes 20-foot bulkheads on each building.

Independent of the Proposed Actions, the Applicant will acquire a part of Lot 8 – Tentative Lot 95. With the Proposed Actions, subdivision of the Castleton lot would allow Tentative Lot 95 (9,428 sf) to be incorporated with Sites A and B to form Projected Development Site 1 under the proposed zoning.

Building 1 on Site A would be the largest of the proposed three buildings. At the ground floor, the building would be set back from its Stuyvesant Place and Hamilton Avenue frontages, and a 7,790 sf privately owned, publicly accessible open space would be provided within these front setbacks. Within the building, retail would be present along the building's Hamilton Avenue and Stuyvesant Place façades. Pedestrian access would be available from Stuyvesant Place to the residential lobby. Vehicular access and egress would be available to the accessory parking on the second and third floors via a curb cut to Hamilton Avenue. A second curb cut along Stuyvesant Place would provide vehicular access to accessory parking in the building's cellar; there would be no internal vehicular access between the parking facility in the cellar and the parking facility on the second and third floors. Residential units would be on the 4th through 26th floors. The building's three-story podium would rise to a height of 38 feet before a setback on both the Stuyvesant Place and Hamilton Avenue frontages. There would be setbacks on the building's Hamilton Avenue façade above floors 8 (22-foot setback), 13 (22-

foot setback), and 18 (22-foot setback), and 23 (24-foot setback). Above the podium at the Stuyvesant Place frontage, the building would rise without a setback to the 21st floor. The building would have 26 stories, and, including a 20-foot bulkhead, the building would rise to a height of 291 feet. The Applicant would widen Stuyvesant Place where street widening is mapped on Projected Development Site 1 through the Department of Building (DOB) Builders Pavement Plan (BPP) process. The sidewalk along Projected Development Site 1's frontage along Hamilton Avenue would be widened to 12 feet, per the requirements of the Special St. George District.

Building 2 would be second largest building on Projected Development Site 1 and would be sited to the north of Building 1. The building would be built within 10 feet of the street line at the ground floor, and would rise five stories (51 feet above the base plane) before a setback up to 13 feet from Richmond Terrace. The Richmond Terrace frontage would then rise to the 20th story before an additional 12-foot setback along Richmond Terrace. The building would have 25 stories plus a bulkhead. Including the bulkhead, the building would rise to a height of 265 feet. There would be no accessory parking within Building 2. The ground floor would contain a 1,715 gsf retail space and a residential lobby, both of which would be accessed from Richmond Terrace.

Building 3 would be the smallest of the proposed buildings on Projected Development Site 1. At the ground floor, the building would contain retail uses, a residential lobby, and accessory parking circulation spaces, all of which would be accessed from Richmond Terrace. Accessory parking spaces would be on the second and third floors. The ground through third floors would comprise the building's podium, which would rise to a height of 47 feet above the base plane. Above the third floor, the building would be set back at least 10 feet from Richmond Terrace. The building would then rise to the 11th floor, or a height of 135 feet; including a 20-foot bulkhead, the building would be 155 feet tall.

The Applicant does not propose development on Projected Development Site 2, which the Applicant does not control.

Analysis Framework

The 2014 *CEQR Technical Manual* serves as guidance on the methodologies and impact criteria to evaluate the potential environmental effects of the Proposed Actions.

Analysis (Build) Year

The analysis year established for this project is 2025, the year when new development generated by the Proposed Actions would be complete and fully occupied. The analysis year assumes the Proposed Actions would be adopted in 2021, and construction would commence soon after and last approximately three years.

Reasonable Worst Case Development Scenario (RWCDS)

Identification of Development Sites

In addition to the Applicant's site (Projected Development Site 1), there would be one projected development site that is not Applicant-controlled, Projected Development Site 2. Because the Proposed Actions would significantly increase the permissible FAR with the mandatory provision of affordable housing on these sites, and remove provisions of the Special Hillsides Preservation District, the Proposed Actions could facilitate new development on Projected Development Site 2. The RWCDS memorandum for this project assumed Projected

Development Site 2 would be developed as a mixed use building with an FAR of 6.0 (the maximum FAR that would be permitted) in the With-Action Condition). Being a site not controlled by the Applicant, the With-Action Condition established in the RWCDS for Projected Development Site 2 does not reflect the Applicant's proposed plans.

No-Action Condition

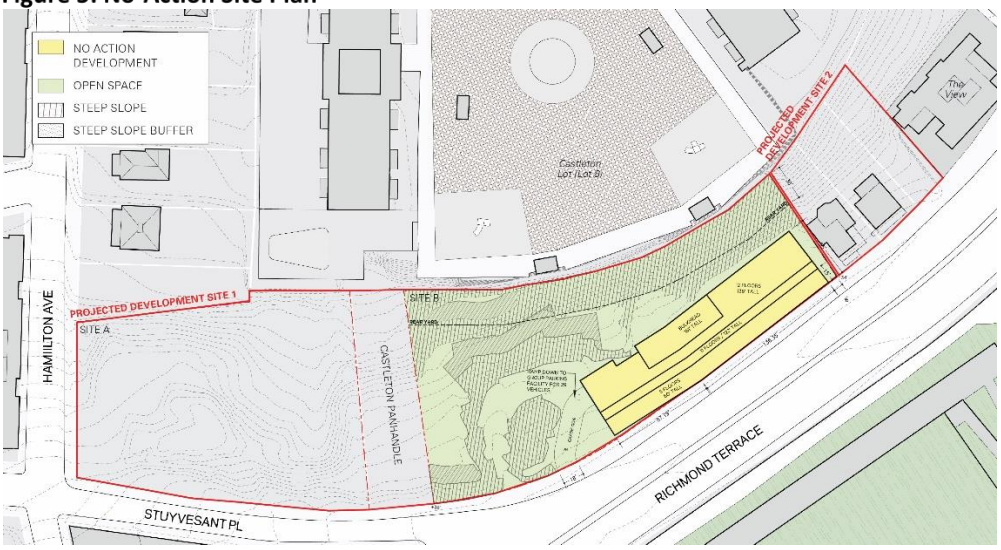
In the No-Action Condition, the Site A portion of Projected Development Site 1 would remain vacant because provisions of the Special Hillsides Preservation District that protect steep slope and steep slope buffers make development of this site difficult to develop as-of-right. The street widening line is only on Site A. Because there would be no development on Site A in the No-Action Condition, no street widening would occur and Stuyvesant Place would remain as existing conditions.

The Site B portion of Projected Development Site 1 would be developed with a 143,030 gsf building comprising 167 market rate DUs (128,169 gsf), 8,240 gsf of retail space, and 12,125 gsf of accessory parking (29 spaces). Of the 131 required parking spaces, 103 would be provided off-site and within 600 feet of Site B. The building would be developed pursuant to R6 height factor regulations. The building base would rise five floors to a height of 60 feet along the Richmond Terrace frontage before a 15-foot setback. The building would then rise six stories before a second setback at the 12th floor. The building would have a roof height of 136 feet. Including a 30-foot-tall bulkhead, the building would be 166 feet tall.

Independent of the Proposed Actions, the Applicant would acquire Tentative Lot 95 (the area within 185 feet of Stuyvesant Place). This tentative lot would not be incorporated into Sites A and B because it is needed for the Castleton lot's required open space ratio, and a non-compliance would occur if subdivided from this zoning lot under existing zoning.

At Projected Development Site 2, the two existing two-family houses would remain as existing conditions. Lot 68 would remain vacant. The No-Action site plan is shown in Figure 5.

Figure 5: No-Action Site Plan



For illustrative purposes only.
Source: FXCollaborative

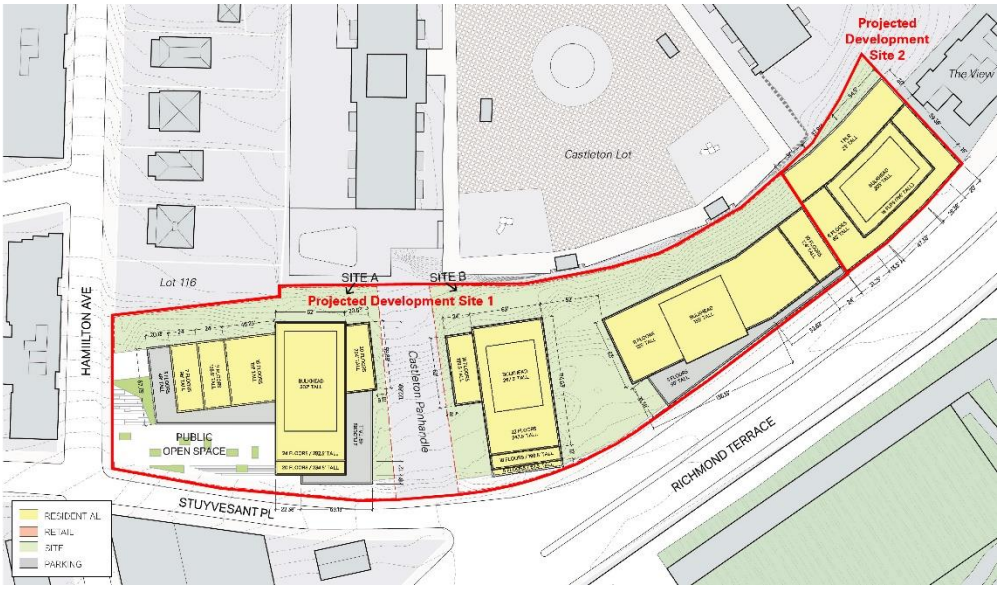
With-Action Condition

The RWCDS With-Action Condition differs from the Proposed Development. In the With-Action Condition, the Proposed Actions would be adopted, and the Applicant would acquire Tentative Lot 95 (similar to the No-Action Condition) to enable Projected Development Site 1 to be one zoning lot. The RWCDS for this project established that the Proposed Actions would facilitate development on two projected development sites.

The RWCDS differs from the Proposed Development because the RWCDS established that Projected Development Site 1 would be developed with up to 797 DUs (687,794 gsf, or a "DU factor" of 863 residential gsf per DU) and up to 23,145 gsf of retail, which is 47 DUs and 4,265 gsf of retail greater than the Proposed Development. The With-Action building envelope also differs from the Proposed Development. In the RWCDS, the roof height of each building would be the same as the Proposed Development, but the bulkhead of each building on Projected Development Site 1 would be 5 feet taller. The street widening line would not affect the floor area of the building, which would be determined by the property line, per Buildings Bulletin 2014-011 issued by the NYC Department of Buildings.[1] The buildings would be sited outside the street widening line, and the depth of the required setbacks would be measured from the mapped street line. The proposed special permit, which requests waivers to the underlying height and setback regulations, would address setback requirements based on the street widening line.

At this time, the Applicant intends to propose MIH Option 2, which would require a minimum of 30% of residential units be permanently affordable at a weighted average of 80% of the AMI. The With-Action site plan is shown in Figure 6.

Figure 6: With-Action Site Plan



Projected Development Site 1

In the With-Action Condition, the RWCDS established that Building 1 would be a 26-story, 403,547 gsf building comprising 325,310 gsf of residential space (348 DU, or a DU factor of 935 residential sf per DU), 11,888 gsf of retail space, and 66,349 gsf of accessory parking

[1] http://www.nyc.gov/html/dob/downloads/bldgs_bulletins/bb_2014-001.pdf

(assuming 200 sf per parking space, up to 332 spaces). The building would have a three-story podium with a base height of 36 feet. The tower portion would rise to a roof height of 273 feet. Including a 25-foot bulkhead, Building 1 would rise to a height of 298 feet. The massing would incorporate a series of setbacks to "step down" to Hamilton Avenue from taller components further west along Stuyvesant Place. At the ground level, a 7,790 sf privately owned, publicly accessible open space would be developed adjacent to the intersection between Stuyvesant Place and Hamilton Avenue. Building 1 would contain 105 affordable units, of which 70 would be reserved for households earning up to 80% of the AMI.

Building 2 would be sited 60 feet to the north of Building 1, and would be a 25-story, 237,559 gsf building comprising 2,102 gsf of retail space and 235,457 gsf of residential space (313 DUs, or a DU factor of 759 residential gsf per DU). There would be no accessory parking within Building 2. The building would have a podium height of 75 feet before a 12.5-foot setback along the Richmond Terrace frontage. The building would then rise to a height of 200 feet to the 20th floor before a 7-foot setback from Richmond Terrace. Above this setback and at a height of 200 feet, the building would rise to a height of 245 feet. Including a 25-foot bulkhead, Building 2 would rise to a height of up to 270 feet. Of the 313 DU in Building 2, 94 would be affordable units, of which 63 would be reserved for households earning up to 80% of the AMI.

Building 3 would be sited on the northwestern portion of Projected Development Site 1. Building 3 would be an 11-story, 171,932 gsf building comprising 9,155 gsf of retail space, 127,027 gsf of residential space (136 DUs, or a DU factor of 935 residential gsf per DU), and 35,750 gsf of accessory parking (assuming 200 sf per space, up to 179 spaces). At the Richmond Terrace frontage, the building would rise to a podium height of 75 feet before a 14-foot setback. The building would then rise to a roof height of 132 feet. Including a 25-foot bulkhead, Building 3 would rise to a height of 157 feet. Of the 136 DU in Building 3, 41 would be permanently affordable units, of which 27 would be reserved for households earning up to 80% of the AMI.

Projected Development Site 2

Projected Development Site 2 is not controlled by the Applicant. Lots 68 and 71 are listed for sale, and Lot 73 is owned by a known developer. The Proposed Actions have the potential to facilitate development on Projected Development Site 2 by introducing an additional 3.0 permissible FAR and removing the site from the Special Hillsides Preservation District. To present a conservative analysis, the With-Action Condition assumes Projected Development Site 2 would be developed with the maximum permissible FAR of 6.0, and to the maximum height permitted by the Proposed Actions.

The RWCDS established that the building would have a 65-foot-tall podium along the entirety of the Richmond Terrace frontage. Above the podium, the tower component would be set back from the side lot lines and 15 feet from Richmond Terrace before rising to the 18th floor and to a roof height of 185 feet. The building would be 205 feet tall including a 20-foot-tall bulkhead. The 117,848 gsf building would contain 4,929 gsf of retail, 100,019 gsf of residential space (100 DUs, or a DU factor of 1,000 residential gsf per DU), and 12,900 sf of accessory parking (43 spaces). Of the 100 DUs, 30 would be permanently affordable units, of which 20 would be reserved for households earning up to 80 percent the AMI.

Increment

Compared to the No-Action Condition, the With-Action Condition would result in larger building envelopes and an increment of 782,352 gsf. The increment established in the RWCDS is shown in

Table 2.

Table 2: Project Increment by Use

Condition	DU	Parking Spaces	Residential gsf	Retail gsf	Parking gsf	Total gsf
No-Action	171	58	128,169	8,240	12,125	148,534
With-Action	897	409	787,813	28,074	114,999	930,886
Increment	**726**	**351**	**659,644**	**19,834**	**102,874**	**782,352**

Probable Impacts of the Proposed Actions

Land Use, Zoning, and Public Policy

The Proposed Actions would not result in significant adverse land use, zoning, or public policy impacts. The Proposed Actions would not adversely affect surrounding land uses, or generate new land uses that would be incompatible with existing land uses, zoning, or public policies in the Study Area. In addition, the Proposed Actions would create land uses or structures that would neither be incompatible with the underlying zoning, nor conflict with public policies applicable to the Study Area.

Collectively, the Proposed Actions would facilitate additional residential, commercial, and accessory parking floor area in the Project Area over the No-Action Condition. The Proposed Actions would allow the Applicant's Site, Projected Development Site 1, to transform a vacant site in Downtown Staten Island into a mixed-use development. The Proposed Actions have the potential to displace two two-family residences on Projected Development Site 2. The proposed uses are already found within the Study Area and would not result in a significant adverse land use or zoning impact.

The Proposed Actions also do not have the potential to conflict with public policies, and would support the goals of OneNYC 2050, Housing New York 2.0, North Shore 2030, North Shore Bus Rapid Transit, or FRESH. The Project Area is wholly outside of the New York City Coastal Zone Boundary and outside the 100-year and 500-year flood zones delineated by the Federal Emergency Management Agency. The Proposed Actions would not conflict with applicable public policy and would not result in a significant adverse public policy impact.

Socioeconomic Conditions

The Proposed Actions would not result in a significant adverse socioeconomic conditions impact. Pursuant to *CEQR Technical Manual* guidelines, preliminary assessments were conducted for direct residential displacement, direct business displacement, indirect residential displacement, indirect business displacement, and adverse effects on specific industries. A preliminary assessment of the five areas of consideration was conducted to determine whether detailed analyses were necessary, in conformance with *CEQR Technical Manual* guidelines. The preliminary assessment ruled out that the Proposed Actions would result in significant adverse impacts related to direct residential displacement, direct business displacement, indirect business displacement, and adverse effects on specific industries.

However, the preliminary assessment found significant adverse impacts could not be ruled out as a result of indirect residential displacement. Therefore, a detailed assessment of indirect residential displacement was conducted and framed in the context of existing conditions and evaluations of the No-Action and With-Action conditions in the 2025 Build Year, including any population and employment changes anticipated to take place within that timeframe.

Direct Residential Displacement

The Proposed Actions would not result in significant adverse impacts due to direct residential displacement. As described in the *CEQR Technical Manual*, direct displacement of fewer than 500 residents would not typically be expected to alter the socioeconomic characteristics of a neighborhood. The Proposed Actions have the potential to directly displace 10 residents on Projected Development Site 2. Following an initial review of the Proposed Actions and anticipated direct residential displacement, a preliminary analysis was not warranted.

Business Displacement (Direct and Indirect)

The Proposed Actions would not result in either a direct or indirect displacement of existing businesses. According to the *CEQR Technical Manual*, projects resulting in an increase of more than 200,000 gsf of commercial space have the potential to result in indirect business displacements due to increased rents. The RWCDS established for this project determined the Proposed Actions would facilitate an increment of 19,834 gsf of commercial space. Further assessment is not warranted.

Adverse Effects on Specific Industries

The Proposed Actions would not result in significant adverse impacts on specific industries. The *CEQR Technical Manual* requires a preliminary assessment of adverse industry effects if the actions involve a regulatory change that can affect businesses and the socioeconomic conditions within a neighborhood. The Proposed Actions are site-specific and would not result in the direct displacement of any businesses. Additionally, the Proposed Actions would not significantly affect business conditions in any specific industry or any category of businesses, nor would it indirectly reduce employment or impair the economic viability of specific industry or category of business.

Indirect Residential Displacement

The *CEQR Technical Manual* calls for a detailed assessment of indirect residential displacement if the preliminary assessment shows that the project would introduce a population with higher average incomes compared to the average incomes of the existing population and would increase the Study Area population by more than 10 percent, both of which applies to the Proposed Actions.

The *CEQR Technical Manual* indicates a significant adverse socioeconomic conditions impact may occur in the area of indirect residential displacement if the detailed assessment identifies a vulnerable population potentially subject to indirect displacement that exceeds five percent of the study area's population. Per CEQR assessment methods, the detailed indirect residential displacement assessment indicates up to 12.8 percent of the Study Area's population is potentially vulnerable to indirect displacement (1,684 people). However, the Proposed Actions would not result in a significant adverse impact because:

- The Proposed Actions would generate approximately 179 income-restricted DUs reserved for low-income households. These project-generated affordable DUs would house approximately 449 low-income residents, a number which represents more than 26 percent of the Study Area's population potentially vulnerable to indirect residential displacement;
- The Proposed Actions would expand the Study Area's permanently rent-protected housing supply by approximately 270 DUs, which is more than 10 percent of the Study Area's existing protected housing supply. These 270 DUs would provide permanent rent-protected housing for approximately 678 residents;

- While the Proposed Actions would decrease the share of protected rental housing in the Study Area, more than 60 percent of the Study Area's rental housing supply would continue to be protected in the With-Action Condition;
- Recent trends in the Study Area and PUMA show that the median and mean household income has not shown any statistically significant change since 2010. Additionally, median rents have shown little change, and there has not been a readily observable trend toward increasing rents; and
- Being on a peninsula near the northeastern edge of Staten Island, the area within 0.5-miles of the Project Area is approximately 50 percent waterbodies. The Study Area established by CEQR methodologies therefore reflects a population density and population less than other inland areas of the St. George neighborhood, and inflates the socioeconomic effects of the Proposed Actions.

Therefore, based on the detailed assessment of indirect residential displacement, the Proposed Actions would not have a significant adverse socioeconomic conditions impact in the area of indirect residential displacement.

Community Facilities and Services

The Proposed Actions would not result in a significant adverse impact to community facilities and services. A preliminary analysis of publicly-funded child care, public schools, and health care and fire/police protection were not warranted for the Proposed Actions. With the Proposed Actions, the public schools utilization rate would operate at less than 100 percent, and the utilization rate would not increase by more than five percent for either elementary or intermediate public schools.

A detailed analysis was completed for publicly-funded libraries because the population introduced by the Proposed Actions would result in an increase of more than five percent (7.42 percent) compared to the No-Action Condition. However, because of the increasing demand for online access to electronic research and resources, the interlibrary loan system, the changing role of libraries, and technology advancements such as the SimplyE mobile app, the Proposed Actions would not result in a significant adverse libraries impact. Therefore, the Proposed Actions would not result in significant adverse community facilities and services impacts.

Public Schools

According to *CEQR Technical Manual* guidelines, a significant adverse impact may result if a proposed action would result in (i) a utilization rate equal to or greater than 100 percent, and (ii) an increase in the collective utilization rate of equal to or greater than 5 percentage points between the No-Action and With-Action conditions. The Proposed Actions would not result in a significant adverse impact to public schools. The Project Area is in Community School District (CSD) 31, Sub-district 4. The Proposed Actions would introduce approximately 305 total students, including approximately 180 elementary school students, 59 intermediate school students, and 66 high school students over the No-Action Condition. In the With-Action Condition, the elementary school utilization rate would increase from 78 percent in the No-Action Condition to 80 percent in the With-Action Condition (a 1.65-percentage-point increase), with a surplus of 2,206 elementary school seats. The intermediate school utilization rate would increase from 70 percent in the No-Action Condition to 71 percent in the With-Action Condition (a 1.06 percentage-point increase), with a surplus of 1,639 intermediate school seats.

Therefore, the Proposed Actions would not result in a significant adverse impact to elementary schools in CSD 31, Sub-district 4. In the With-Action Condition, both elementary and intermediate schools would continue to operate under capacity (less than 100 percent utilization rate). Therefore, the Proposed Actions would not result in a significant adverse public schools impact.

Child Care Centers

The Proposed Actions would not result in a significant adverse impact to publicly funded childcare centers. In the With-Action Condition, approximately 179 new low- to moderate-income units would be developed by 2025. Based on the childcare multipliers provided in the *CEQR Technical Manual*, the Proposed Actions would generate approximately 16 children under the age of six who could be eligible for publicly funded childcare programs. Per the *CEQR Technical Manual*, only projects that would generate 20 or more children under the age of six who could be eligible for publicly-funded daycare warrant a detailed publicly-funded daycare analysis. Therefore, the Proposed Actions would not result in significant adverse indirect impacts to publicly-funded childcare services.

Libraries

The Proposed Actions would not result in significant adverse impacts to public libraries. There is one NYPL branch located within a 0.75-mile radius of the Project Area: the St. George Library Center. The Proposed Actions would introduce an estimated 1,822 additional residents to the library's catchment area over the No-Action Condition. The Proposed Actions would result in an increase in the catchment area population of greater than 5 percent, which may result in a noticeable change in the delivery of library services. However, the increasing demand for online access to electronic research and resources, the SimplyE mobile app, and the interlibrary loan system would make space available for increased patron capacity and programs to serve the future population. Therefore, the Proposed Actions would not result in significant adverse impacts to public libraries.

Open Space

According to the *CEQR Technical Manual*, a proposed action may result in a significant adverse impact on open space resources under the following circumstances: (i) there would be a direct displacement/alteration of existing open space within the study area that has a significant adverse effect on existing user population (direct impact); or (ii) the proposed project would reduce the open space ratio and consequently result in the overburdening of existing facilities or further exacerbate a deficiency in open space (indirect impact). Based on the preliminary screening assessment, the Proposed Actions would not displace or alter an existing open space; therefore, the Proposed Actions would not result in any direct impact on open space and a detailed assessment of direct open space impacts is not warranted.

An indirect assessment is warranted if a project would generate more than 200 residents or 500 employees, according to the *CEQR Technical Manual*. Because the Proposed Actions would introduce an additional 1,822 residents and 95 employees, a detailed assessment of indirect effects to open space was conducted for the residential population. An assessment was not warranted for the non-residential population. To assess the indirect impacts of the Proposed Actions within the Study Area (0.50-mile), a detailed assessment was conducted pursuant to *CEQR Technical Manual* guidelines.

According to *CEQR Technical Manual* guidelines, a decrease in the open space ratio (OSR) of 5 percent or more is generally considered significant. An open space impact assessment also considers qualitative factors.

The detailed analysis determined that the Proposed Actions would decrease the active, passive, and total OSRs in the Study Area by more than 10 percent. In the With-Action Condition, the total open space ratio within the 0.50-mile Study Area would decrease by 11.26 percent to 1.26 acres per 1,000 residents. The passive open space ratio would decrease from 0.88 to 0.79 acres per 1,000 residents, a decrease of 10.75 percent. The active open space ratio would decrease from 0.53 to 0.47 acres per 1,000 residents, a reduction of 12.10 percent (see Table 3).

Table 3: Percent Change in Open Space Ratio

Residential Population	Type	Acreage	OSR[1]	OSR Planning Goal
No-Action Condition				
13,232	Active	7.07	0.53	2.0
	Passive	11.67	0.88	0.5
	Total	**18.74**	**1.42**	**2.5**
With-Action Condition				
15,054	Active	7.07	0.47	2.0
	Passive	11.85	0.79	0.5
	Total	**18.92**	**1.26**	**2.5**
Increment				
1,822	Active	0.00	-0.06	
	Passive	0.18	-0.09	
	Total	**0.18**	**-0.16**	
Percent Change				
	Active (%)	0.00	-12.10	
	Passive (%)	1.54	-10.75	
	Total (%)	**0.96**	**-11.26**	

[1] Open Space Ratio = Acres of Open Space/ residential population * 1,000.
Note: Numbers may not add due to rounding

The reduction in passive open space would be partially offset by the proposed 0.18-acre privately-owned, publicly accessible passive open space on Projected Development Site 1, which would include passive recreational facilities such as benches, lighting, and paved areas, and would be maintained by the applicant. The With-Action passive space OSR of 0.79 would be more than 150% the City's planning goal of 0.5 acres of passive space per 1,000 residents, and therefore the Proposed Actions would not result in a significant adverse passive open space impact.

In the No-Action and With-Action conditions, there would be a deficiency of active open space, as the Study Area's No-Action OSR of 0.53 would be well below the City's planning goal of 2.0 acres of active open space per 1,000 residents. Relative to the No-Action Condition, the With-Action Condition's active OSR would be further reduced from 0.53 to 0.47 acres per 1,000 residents. Therefore, the Proposed Actions would result in a significant adverse indirect impact in the area of active open space because the Proposed Actions would decrease the active open space ratio by more than five percent in an area currently below the City's median community district OSR of 1.5 acres per 1,000 residents. The Proposed Actions would not introduce new publicly-accessible active open space to partially offset the reduction in active open space per

1,000 residents. Therefore, the Proposed Actions would result in a significant adverse open space impact due to indirect effects (increased user population). Possible measures to address the impact are discussed in Chapter 13, "Mitigation."

Shadows

The Proposed Actions would not result in a significant adverse shadows impact. The Proposed Actions have the potential to cast shadow on historic, open space, and natural resources based on the Tier 1 through Tier 3 screenings. However, a detailed assessment was warranted only for the St. George Waterfront Esplanade because a Tier 3 screening was unable to rule out significant adverse shadows impacts. The St. George Waterfront Esplanade has seating areas near the waterfront with sweeping views across Upper Bay.

Overall, the Proposed Actions have the potential to cast incremental shadow on the St. George Waterfront Esplanade on the December 21 and March 21 analysis days. The detailed assessment shows that incremental shadow would be cast throughout the December analysis day on sunlight-sensitive resources. Because incremental shadow would move throughout the day and other, similar sunlit bench seating would continue to be available in areas of the St. George Waterfront Esplanade throughout the day, there would not be a significant adverse shadow impact on the December analysis day, the analysis day representative of cold weather conditions when demand for open spaces is lower. On the March analysis day, incremental shadow would be cast on the Postcards memorial for approximately 30 minutes toward the end of the analysis day. The memorial, which does not have any sunlight-dependent features, would continue to receive direct sunlight for the remainder of the analysis period (more than 90% of the analysis period).

While incremental shadow would shade some bench seating areas, sunlit bench seating would continue to be available in the immediate area along the St. George Waterfront Esplanade during all times of incremental shadow. The Proposed Actions therefore do not have the potential to result in a significant adverse shadows impact.

Historical and Cultural Resources

The Proposed Actions would not result in a significant adverse historic and cultural resources impact. A preliminary assessment of archaeological and architectural resources was conducted in coordination with the NYC Landmarks Preservation Commission (LPC), which determined that there are five historic resources located within 400 feet of the Project Area and that the Proposed Actions have the potential to result in incremental in-ground disturbance. Therefore, a preliminary analysis of the potential indirect impacts of the Proposed Actions on architectural resources was conducted, as well as a comprehensive review of effects on potential archaeological resources. Direct effects on architectural resources were not evaluated because there are no eligible or designated historic resources on the projected development sites within the Project Area. Based on the preliminary analysis of indirect impacts, the Proposed Actions would not result in a significant adverse impact to architectural resources.

Archaeological Resources

LPC reviewed the projected development sites within the Project Area. In a comment letter dated September 10, 2019 (Appendix F of the EAS), LPC determined that the Project Area is not archeologically sensitive and contains no archaeological historic resources.

Architectural Resources

Direct (Physical) Impacts

Because there are no eligible or designated historic resources on the development sites, there are no potential significant adverse direct impacts related to historic resources.

Indirect (Contextual) Impacts

There are five historic resources located within 400 feet of the Project Area. Although development resulting from the Proposed Actions could alter the setting or visual context of several of these historic resources, none of the alterations to the historical settings or visual context would result in significant adverse impacts. The Proposed Actions would not alter the relationship of any identified historic resources to the streetscape, since all streets in the Study Area would remain open and each resource's relationship with the street would remain unchanged in the With-Action Condition. The Proposed Actions would not eliminate or substantially obstruct important public views of architectural resources, as all significant elements of these resources would remain visible from public streets and view corridors. In addition, the Proposed Actions would not introduce any incompatible visual, audible, or atmospheric elements in the area of historic resources in the With-Action Condition. Therefore, the Proposed Actions would not result in any significant adverse indirect or contextual impacts to historic architectural resources.

Urban Design and Visual Resources

The Proposed Actions would not result in a significant adverse urban design and visual resources impact. In the With-Action Condition, Building 1 would be developed on Lot 100 as a 298-foot-tall (273 feet plus a 25-foot bulkhead) mixed-use building. A privately owned, publicly accessible open space would be also developed on Lot 100, adjacent to Building 1. Building 2 would be developed on Lot 92 as a 270-foot-tall building (245 feet plus a 25-foot bulkhead). Building 3 would be developed on Lot 82 as a 157-foot-tall building (132 feet plus a 25-foot bulkhead). Accessory parking would be provided in the podiums of Buildings 1 and 3. Projected Development Site 2 is not controlled by the Applicant but it could reasonably be developed with a 205-foot-tall (185 feet plus a 20-foot bulkhead) building that would be sited at the street line. Accessory parking in Building 2 would be provided on the second floor and would be accessed by a ramp from Richmond Terrace. All parking at the projected development sites would be provided within buildings. Active uses would be developed at the ground levels within all new buildings in the Rezoning Area.

The massings of the buildings on Projected Development Site 1 have been designed to "step up" from shorter buildings farther north along Richmond Terrace. Building 3 would be the shortest building on Projected Development Site 1. Building 1 – the building closest to the St. George civic core – would be the tallest building in the Study Area with a height of 298 feet. The elevation of the bulkhead would be 28 feet taller than the bulkhead of the south tower of the Castleton Park Apartments. Building 1 would incorporate a series of "step-downs" near Hamilton Avenue from its highest points to match the existing front yard setbacks and street wall height along the north side of Hamilton Avenue.

Views would continue to be available in the With-Action Condition along the upland streets, such as Hamilton Avenue and Nicholas Street, towards the Upper Bay and the Manhattan, Brooklyn, and New Jersey skylines. Views would also continue to be available to these visual resources from other locations in the Study Area such as the St. George Waterfront Esplanade and the North Shore Esplanade.

Typical of new development in urban areas, development in the With-Action Condition has the potential to affect the viewing context of nearby historic visual resources, such as Staten Island Family Courthouse and Curtis High School, by introducing new buildings that can be seen while viewing these resources. Close-range views of these resources themselves would not be affected and would continue to be available for public enjoyment from the surrounding street network.

Overall, the Proposed Actions would facilitate tall, slender towers on underdeveloped sites, consistent with the design objectives of the Special St. George District. The proposed 29-foot setback of Building 1 would be similar to other front setbacks along the north side of Hamilton Avenue, and would allow the existing visual corridor along Hamilton Avenue to continue. A new privately-owned, publicly accessible open space would be developed at the northwest corner of intersection of Stuyvesant Place and Hamilton Avenue. The buildings in the With-Action Condition would activate Richmond Terrace, Hamilton Avenue, and Stuyvesant Place with active ground floor uses. Project-generated development would provide articulation and visual interest to the St. George skyline. Accordingly, the Proposed Actions would not result in a significant adverse urban design and visual resources impact.

Hazardous Materials

The Proposed Actions would not result in a significant adverse hazardous materials impact. Known or potential hazardous material conditions resulting from previous and existing uses in and near the Project Area were assessed through historic Phase I Environmental Site Assessments (ESAs) and a Phase II Environmental Site Investigation.

The hazardous materials assessment identified various semi-volative organic compounds (SVOCs), metals, and various pesticides in exceedance of applicable standards, consistent with the presence of historic fill material. In addition, two polyfluoroalkyl substances (PFAS) analytes, perfluorooctanesulfonic acid (PFOS) and perfluorooctanoic acid (PFOA), were detected in exceedance of applicable standards. Soil vapor sampling indicated the presence of the chlorinated solvent tetrachloroethene (PCE) at low concentrations in six of nine soil vapor samples, and the chlorinated solvent 1,1,1-trichloroethane (1,1,1-TCA) at low concentrations in one soil vapor sample. Several petroleum-related VOCs, including benzene, toluene, ethylbenzene, xylenes, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene were also detected in soil vapor samples across the site, with the highest concentrations occurring in samples collected from the northern portion of the site. Groundwater was not encountered as part of the Phase II Environmental Site Investigation.

To preclude the potential for adverse impacts associated with new construction resulting from the Proposed Actions, an (E)-Designation for hazardous materials would be placed on Projected Development Sites 1 and 2. The (E)-Designation would require approval by the New York City Office of Environmental Remediation (OER) prior to the issuance of new permits from the NYC Buildings Department (DOB) that would entail soil disturbance. The requirements of the (E)-Designation must be satisfied in coordination with OER before each development site can be redeveloped and occupied. With the proposed (E)-Designation (E-614) in place, the Proposed Actions would not result in significant adverse hazardous materials impacts.

Water & Sewer Infrastructure

The Proposed Actions would not result in a significant adverse water and sewer infrastructure impact. The Proposed Actions would result in incremental residential and commercial floor area over the No-Action Condition. The With-Action Condition would not generate demand for more than 1 mgd of water and therefore a water supply analysis is not warranted.

In the With-Action Condition, wastewater generated at the development sites would continue to be treated by the Port Richmond WWTP. Based on the water usage and sewage generation rates shown on Table 13-2 of the *CEQR Technical Manual*, development in the With-Action Condition would generate approximately 231,885 gpd of wastewater, which is a net increase of approximately 186,986 over the No-Action Condition. This 186,986 gpd of incremental wastewater represents an increase of 0.19 mgd to the Port Richmond WWTP wastewater capacity. The Port Richmond WWTP has an excess capacity of approximately 35.27 mgd and can accommodate the incremental flows without exceeding the WWTP's design capacity.

The Proposed Project is within a combined sewer overflow drainage area, where all stormwater runoff is discharged directly to the Port Richmond WWTP drainage area. In the With-Action Condition, compliance with stormwater detention requirements per Chapter 31 of Title 15 of the Rules of the City of New York preclude the potential for significant adverse impacts to New York City stormwater infrastructure or treatment facilities. The Proposed Actions would also not result in significant adverse impacts on the City's wastewater infrastructure or treatment facilities. Accordingly, the Proposed Actions would not result in a significant adverse water and infrastructure impact, and no further analysis is warranted.

Transportation

The Proposed Actions would result in a significant adverse transportation impact in the area of traffic. Five intersections (comprising ten intersection approaches/lane groups) in the study area would potentially experience significant adverse traffic impacts in at least one peak hour. There would be no significant adverse transportation impacts in the areas of transit, pedestrians, or vehicular safety. Further, the Proposed Actions would not result in a parking shortfall.

Traffic

The Proposed Actions would generate approximately 190, 199, 190 and 213 net incremental vehicle trips during the weekday AM, midday, PM and Saturday midday peak hours, respectively. Traffic conditions were evaluated for these four peak hours at thirteen intersections in the general vicinity of the Project Site, where the net incremental increase in vehicle trips due to the Proposed Actions would exceed the CEQR threshold for conducting detailed traffic analysis. The capacity analyses indicate that ten intersection approaches/lane groups in the study area would experience potentially significant adverse traffic impacts in at least one peak hour as a result of the Proposed Actions, and are summarized as follows:

- The westbound left-turn of Richmond Terrace at Jersey Street during the weekday AM peak hour.
- The westbound through-right movement of Richmond Terrace at Jersey Street during the weekday AM, midday, PM and Saturday midday peak hours.
- The eastbound approach of Richmond Terrace at Westervelt Avenue during the weekday AM and Saturday midday peak hours.
- The westbound approach of the Empire Mall Driveway at Richmond Terrace during the weekday AM, midday, PM and Saturday midday peak hours.
- The northbound right-turn of Richmond Terrace at Wall Street/Empire Mall Driveway during the weekday midday, PM and Saturday midday peak hours.
- The northbound left-turn of Bay Street at Victory Boulevard during the weekday midday and PM peak hours.

- The northbound through-right movement of Bay Street at Victory Boulevard during the weekday midday and Saturday midday peak hours.
- The southbound left-through movement of Bay Street at Victory Boulevard during the weekday midday and Saturday midday peak hours.
- The eastbound approach of Hamilton Avenue at St. Marks Place during the weekday AM and midday peak hours.
- The westbound approach of Hamilton Avenue at St. Marks Place during the weekday AM and midday peak hours.

Possible mitigation measures are summarized below under "Mitigation."

Transit

The Project Area is well-served by 22 New York City Transit (NYCT)/MTA bus lines, as well as the Staten Island Railway (SIR) and the Staten Island Ferry which can be accessed at the St. George Terminal approximately 0.5 miles from the Project Site. However, the net incremental subway/rail and bus trips generated by the Proposed Actions, respectively, are below the CEQR threshold for conducting detailed analyses of transit conditions. Therefore, the Proposed Actions would not result in a significant adverse transit impact.

Pedestrians

The Proposed Actions would generate approximately 110, 555, 268 and 311 net incremental walk-only trips; and approximately 626, 1,052, 780 and 884 net incremental person trips during the weekday AM, midday, PM and Saturday midday peak hours, respectively. Pedestrian conditions were evaluated for these four peak hours at four pedestrian elements in the vicinity of the Project Site, where the net incremental increase in pedestrian trips due to the Proposed Actions would exceed the CEQR threshold for conducting detailed analysis. The capacity analyses indicate that each of these pedestrian elements would operate at acceptable service conditions in the With-Action Condition, and therefore, the Proposed Actions would not result in a significant adverse pedestrian impact.

Parking

The parking analysis evaluates the off-street public parking supply and utilization at the five public parking facilities within a ¼-mile radius of the Project Site. In the With-Action Condition, 409 parking spaces would be provided on the Project Site and the Proposed Actions would generate a peak parking demand during the overnight period of approximately 475 spaces for both the typical weekday and Saturday conditions. This demand would result in a peak parking shortfall of approximately 66 spaces during the overnight period; however, this demand would be accommodated at the public parking facilities within ¼-mile of the Project Site. Therefore, the parking demand generated by the Proposed Actions would not result in a parking shortfall in the study area.

Vehicular and Pedestrian Safety

Crash data for the study area intersections were obtained from the New York State Department of Transportation (NYSDOT) for the three-year period from January 1, 2016 to December 31, 2018. Based on this information, none of the study area intersections are identified as high-crash locations within any consecutive 12-month period of the most recent three-year period. Therefore, the Proposed Actions would not adversely affect the vehicle and pedestrian safety conditions in the study area.

Air Quality

Absent mitigation, the Proposed Actions would result in a significant adverse air quality impact due to mobile source emissions from traffic. Emissions of $PM_{2.5}$ over annual and 24-hour periods would exceed both National Ambient Air Quality Standards (NAAQS) and CEQR *de minimis* criteria due to a deteriorating traffic conditions at the intersection of St. Marks Place and Hamilton Avenue. For the Proposed Actions, a preliminary screening in the areas of HVAC, industrial source, and large or major sources was warranted.

Stationary Sources

The Proposed Actions would facilitate the development of four buildings of varied heights across two development sites. Because of the varied heights, there is no potential for impacts from cumulative emissions from the buildings, as emissions would be released at various elevations. There are no large or major emissions sources within 1,000 feet of the Project Area, and therefore detailed large or major source industrial emissions analysis was not warranted.

A review of New York City Department of Environmental Protection (DEP) Clean Air Tracking System (CATS) database within 400 feet of the Project Area found 14 boiler permits that do not warrant further analysis. The review found one permit (GA000495) for a gas station at 78 Richmond Terrace (Block 9, Lot 28) that expired in 2001; this site is improved with the NYPD 120th Precinct and has no potential for the gas station use to be reestablished. Accordingly, the Proposed Actions do not have the potential to result in a significant adverse industrial source air quality impact.

The air quality nomograph screenings show that with natural gas as a fuel source, Building 2's HVAC emissions would not have the potential to result in a significant adverse air quality impact on Building 1. Proposed (E)-Designation E-614 would require Building 2 to use natural gas as a fuel source. With the use of natural gas as a fuel source, emissions from Building 3 do not have the potential to result in significant adverse air quality impacts; however, if fuel oil #2 is used a fuel source, the (E)-Designation would require the emissions point to be at least 125 feet from the nearest receptor of similar or greater height to preclude a significant adverse air quality impact. Building 4 on Projected Development Site 2 passed the nomograph screening in both the natural gas and fuel oil #2 scenarios, and no air quality (E)-Designation is warranted for this site.

Therefore, to preclude the potential for project-on-project or project-on-existing air quality impacts from stationary sources, an (E)-Designation for air quality would be assigned to Projected Development Site 1 (Block 13, Lots 82, 92, and 100) for air quality. With implementation of the proposed (E)-Designation, the Proposed Actions do not have the potential to result in significant adverse stationary air quality impacts.

Mobile Sources

The Proposed Actions would not generate 170 or more incremental passenger car equivalent trips during any peak hour at any intersection. An intersection assessment was warranted for particulate matter (PM) because the Proposed Actions would generate more than 12 heavy duty vehicle-equivalents on a paved road with fewer than 5,000 average daily traffic trips. An analysis of vehicular roadway emissions at the intersection of St. Marks Place and Hamilton Avenue was performed to represent worst-case conditions. The assessment analyzed pollutants PM_{10} and $PM_{2.5}$ using the methodology set forth in the *CEQR Technical Manual*. The resulting PM_{10} and $PM_{2.5}$ concentrations would exceed the NAAQS and *de minimis* thresholds in the absence of mitigation. Therefore, the Proposed Actions would result in a significant adverse air quality impact in the area of mobile source emissions. This significant adverse

impact would be fully mitigated with the installation of an all-way STOP-control, as described in Chapter 13, "Mitigation."

Additionally, an analysis of the emissions from the garage within Building 3 was performed to represent worst-case conditions of mobile sources in project-generated parking facilities and calculate pollutant levels in the surrounding area per the methodology set forth in the *CEQR Technical Manual*. Concentrations of CO, PM_{10}, and $PM_{2.5}$ due to project-generated mobile sources in the proposed garage facilities would not result in exceedances of NAAQS or CEQR *de minimis* criteria. Therefore, mobile source emissions from project-generated parking garages would not result in a significant adverse air quality impact.

Greenhouse Gas Emissions and Climate Change

The Proposed Actions would not result in a significant adverse greenhouse gas emissions and climate change impact. The RWCDS established for the Proposed Actions would generate approximately 3,802 total metric tons carbon dioxide equivalent (CO_2e) of annual emissions from building operations, and 10,479 metric tons of CO_2e emissions from mobile sources annually, for an annual total of approximately 14,281 metric tons of CO_2e emissions. This represents a worst-case scenario, and would be less than 0.028 percent of the City's overall 2017 (the latest data available) GHG emissions of approximately 51.0 million metric tons.[2]

Construction-generated GHG emissions were not modeled explicitly for this project, but are estimated to be equivalent to approximately five to ten years of operational emissions, including both direct energy and emissions embedded in materials (extraction, production, and transport). For this project, the estimated construction-generated GHG emissions would equate to between 71,405 and 142,810 metric tons of CO_2e over the course of construction.

The Proposed Actions would advance New York City's GHG reduction goals because the Project Area is in a downtown urban area with access to a variety of transit options and within walking distance of ferry, bus, and rail connections at St. George Terminal. Development facilitated by the Proposed Actions would be required to comply with local laws intended to reduce the GHG emissions such as Local Law 22 of 2008 (known as the New York City Climate Protection Act), Local Law 66 of 2014 ("80 x 50"), and Local Law 97 of 2019. The new buildings would be subject to the New York City Energy Conservation Code (NYCECC), which was updated in 2020 to be one of the highest energy efficient standards nationwide for sustainability and efficiency. The NYCEEC governs performance requirements for heating, ventilation, air conditioning systems, and exterior building envelope; the proposed buildings would be constructed in compliance with this code. The Proposed Actions would therefore comply with the City's emissions reduction goals of transit-oriented development and the construction of new resource- and energy-efficient buildings.

The Project Area is entirely outside the existing and projected future 100- and 500-year flood zones, and therefore is not susceptible to storm surge and coastal flooding. The Proposed Actions would be consistent with the New York City policies regarding adaptation to climate change because the Project Area is in an area of minimal flood risk.

[2] City of New York Inventory of New York City's Greenhouse Gas Emissions 2017, Mayor's Office of Sustainability, New York, 2017 https://nyc-ghg-inventory.cusp.nyu.edu/. Last accessed 17 December 2020.

Noise

The Proposed Actions would not result in a significant adverse noise impact. The Project Area is proximate to the Richmond County Bank Ballpark, mechanical equipment on the roof of the Castleton Park Apartments parking garage, and other ambient noise sources in the area such as traffic along Richmond Terrace and Stuyvesant Place. The Proposed Actions are not projected to increase mobile source noise levels by more than 2.9 dBA. The proposed (E)-Designation would be require the Applicant to coordination with the NYC Mayor's Office of Environmental Remediation to incorporate the minimum noise attenuation specifications.

The design of and specification for building mechanical systems, such as heating, ventilation, and air conditioning (HVAC), would meet all applicable noise regulations (i.e., Subchapter 5, §24-227 of the New York City Noise Control Code and the New York City Department of Buildings Mechanical Code), ensuring that the equipment does not result in any significant increase in ambient noise levels.

Public Health

The Proposed Actions would not result in a significant adverse public health impact and would not result in an unmitigated significant adverse impact in any of the technical areas that contribute to public health. The *CEQR Technical Manual's* goal with respect to public health is "to determine whether adverse impacts on public health may occur as a result of a proposed project and, if so, to identify measures to mitigate such effects."

According to the *CEQR Technical Manual*, where no significant unmitigated adverse impact is found in other CEQR analysis areas, such as air quality, water quality, hazardous materials, or noise, no public health analysis is warranted. If an unmitigated significant adverse impact is identified in one of these analysis areas, the lead agency may determine that a public health assessment is warranted for that specific technical area.

As described in the relevant analysis of this Draft Environmental Impact Statement (DEIS), the Proposed Actions would not result in unmitigated significant adverse impacts in the CEQR technical areas of air quality, water and sewer infrastructure, hazardous materials, or noise. During construction, air quality emissions and noise would not rise to levels that would create a public health impact. Therefore, the Proposed Actions would not result in a significant adverse public health impact.

Neighborhood Character

The Proposed Actions would not result in significant adverse impacts to neighborhood character. The Proposed Actions would not result in significant adverse impacts in the any of the technical areas that contribute to a neighborhood's character, including land use, zoning, and public policy, socioeconomic conditions, shadows, urban design and visual resources, historic and cultural resources, or noise.

The scale of significant adverse impacts to open space and transportation would not affect any defining features of neighborhood character nor would a combination of moderately adverse impacts affect the neighborhood's defining features. The Proposed Actions would introduce a new publicly-accessible private open space on the Applicant's site and would introduce additional pedestrian activity. This pedestrian activity would further activate the immediate area and provide opportunities for local commercial establishments to capture passing trade. Ultimately, the Proposed Project would be consistent with existing development trends and would facilitate new mixed-use development on an urban infill site. Based on the results of the

preliminary assessment, there is no potential for the Proposed Action to result in any significant adverse neighborhood character impacts.

Construction

Construction of the Proposed Actions have the potential to result in significant adverse construction traffic and noise impacts. The Proposed Actions would facilitate the demolition of the existing structures in the Project Area and the development of four buildings across two development sites. Three buildings would be constructed on Projected Development Site 1 and one building would be constructed on Projected Development Site 2. Project-generated construction would be completed in two phases over an approximately 51 month period, including a six-month gap between Phase 1 and Phase 2 construction activities. Phase 1, which includes the entirety of Development Site 1, would be fully constructed 30 months after construction commences. Phase 2, which would involve construction of Projected Development Site 2, would be constructed in 15 months; including a six-month period of no construction activities between Phases 1 and 2, the cumulative construction period would be 51 months. Significant adverse construction traffic impacts would occur at seven intersection approaches/lane groups, and significant adverse construction noise impacts would occur at 20 locations.

Open Space

Construction activities would not occur on or adjacent to public open spaces, and the proposed open space on Projected Development Site 1 would be open after Phase 1 and would not be available for construction during Phase 2. Phase 2 construction would occur more than 400 feet from the proposed privately accessible open space on Projected Development Site 1; therefore, there would be no significant adverse construction open space impacts.

Hazardous Materials

A detailed assessment of the potential risks related to the construction for the proposed actions with respect to any hazardous materials and mitigation measures related to the potential impacts is provided in Chapter 4, "Hazardous Materials."

To reduce the potential for adverse impacts associated with new construction resulting from the proposed actions, further environmental investigations and remediation will be required. To ensure that these investigations are undertaken, a hazardous materials (E)-Designation would be placed on the projected development sites. The (E)-Designations would require approval by the NYC Office of Environmental Remediation (OER) prior to obtaining NYC Buildings Department (DOB) permits for new development entailing soil disturbance.

With the inclusion of the measures required by the (E)-Designations, construction resulting from the Proposed Actions would not result in significant adverse impacts related to hazardous materials.

Transportation

The peak number of trips generated by construction of the Proposed Actions is expected to occur in the second quarter of 2023 (seventh quarter of construction [Q7]). During this peak quarter, project-generated construction would generate an average of approximately 462 workers and 34 truck deliveries per day. Therefore, Q7 was selected to assess the construction transportation conditions to identify any potentially significant adverse impacts to traffic, transit, pedestrians and parking in the study area.

Traffic

Construction of the Proposed Project would generate a maximum of approximately 230 and 210 Passenger Car Equivalent (PCE) vehicle trips during the weekday AM (6:00 AM – 7:00 AM) and PM (3:00 PM – 4:00 PM) construction peak hours, respectively. Traffic conditions were evaluated for these two peak hours at seven intersections in the general vicinity of the Project Site, where the net increase in vehicle trips due to construction of the Proposed Project would exceed the CEQR threshold for conducting detailed traffic analysis. The capacity analyses indicate that the following seven intersection approaches/lane groups in the study area could experience potentially significant adverse traffic impacts in at least one peak hour as a result of construction activities associated with the Proposed Project:

- The eastbound through-right movement of Richmond Terrace at Jersey Street during the weekday AM construction peak hour.
- The westbound through-right movement of Richmond Terrace at Jersey Street during the weekday PM construction peak hour.
- The eastbound approach of Richmond Terrace at Westervelt Avenue during the weekday AM construction peak hour.
- The westbound approach of the Parking Garage Driveway/Nicholas Street at Richmond Terrace during the weekday PM construction peak hour.
- The westbound approach of the Empire Mall Driveway at Richmond Terrace during the weekday AM and PM construction peak hours.
- The northbound right-turn of Richmond Terrace at Wall Street during the weekday PM construction peak hour.
- The southbound left-through movement of Bay Street at Victory Boulevard during the weekday PM construction peak hour.

In total, construction of the Proposed Project could result in eight potentially significant adverse traffic impacts during either construction peak hour at the seven intersection approaches/lane groups in the study area. Chapter 13, "Mitigation," discusses potential measures to mitigate these potentially significant adverse traffic impacts.

Transit

The Project Area is well-served by 22 New York City Transit (NYCT)/MTA bus lines, as well as the Staten Island Railway (SIR) which can be accessed at the St. George Terminal approximately 0.5 miles from the Project Site. However, the maximum peak hour subway/rail and bus trip generation due to construction of the Proposed Project are below the CEQR threshold for conducting detailed analyses of transit conditions. Therefore, the Proposed Actions would not result in potentially significant adverse transit impacts during construction.

Pedestrians

Construction of the Proposed Actions would generate a maximum of approximately 370 construction worker trips during the weekday AM (6:00 AM – 7:00 AM) and PM (3:00 PM – 4:00 PM) construction peak hours. The net increase in pedestrian trips due to project-generated construction is expected to exceed the CEQR threshold for conducting detailed analysis during the weekday AM and PM construction peak hours at the northwest corner at the intersection of Richmond Terrace and Hamilton Avenue. However, this pedestrian element is expected to operate at acceptable conditions during construction of the Proposed Project given the similar pedestrian increments and projected future operating conditions

summarized in the operational analysis (see Chapter 5, "Transportation"). Therefore, the Proposed Actions would not result in potentially significant adverse pedestrian impacts during construction.

Parking

Construction of the Proposed Project would generate a maximum parking demand of approximately 260 spaces during the weekday midday period. The operational parking analysis conducted for the Proposed Project indicates that in the No-Action Condition, off-site public parking facilities within ¼-mile of the Project Site would operate at approximately 82 percent utilization with approximately 468 available spaces during the weekday midday period. Therefore, the Proposed Actions would not result in a potential public parking shortfall in the area during construction.

Air Quality

Detailed air quality modeling was completed to assess whether the emissions during the construction stage would have the potential to result in significant adverse air quality impacts during construction. The worst-case construction-generated air effects would occur during the second quarter of Phase 1, and the worst-case annual effects would occur between the first and fourth quarters of Phase 1. Construction of Projected Development Site 2 (Phase 2), would be short-term, and would result in fewer air quality emissions than Phase 1.

Dispersion modeling analysis of construction-related air emissions from the worst-case construction period confirmed that construction under the Proposed Actions and would not result in significant adverse air quality impacts with the following emission control measures:

- Ultra-low-sulfur diesel (ULSD) fuel would be used for all diesel engines;
- All equipment would use Best Available Technology (BAT) to minimize particulate emissions. The BAT includes diesel particulate filters on all nonroad equipment with a capacity of 50 horsepower (hp) or less;
- For construction on Building 3, diesel generators rated at less than 50 hp, would use diesel particulate filters (DPFs), either installed by the original equipment manufacturer (OEM) or retrofitted;
- All non-road construction equipment with a power rating of 50 hp or greater would meet at least the Tier 3 emissions standard to the extent practicable.
- Vehicle idle time would be restricted to three minutes for equipment and vehicles that do not require their engines to operate a function such as loading, unloading, or processing device (e.g., concrete mixing trucks), or as otherwise required for the proper operation of the engine.

With the implementation of these emission reduction measures, the dispersion modeling of construction-related air emissions for both on-site and off-site sources determined that the annual-average NO_2, one-hour and eight-hour CO, and 24-hour and annual $PM_{2.5}$ concentrations would be below the corresponding NAAQS and *de minimis* thresholds at the sensitive receptors during peak construction. Construction-related emissions would be reduced outside of the peak construction periods, and would similarly be below the NAAQS and *de minimis* thresholds. Therefore, the Proposed Actions would not result in significant adverse construction impacts in the area of air quality.

Noise

Construction resulting from the Proposed Actions have the potential to result in a temporary significant adverse noise impact. The analysis found project-generated construction has the potential to result in increased maximum quarterly noise levels exceeding the 15 dBA threshold over 12 months at 18 location and exceeding the 20 dBA threshold over three months at 16 locations in worst-case conditions. The project-generated construction would also exceed the CEQR screening threshold of 3 dBA over 24 months at up to 20 locations. Therefore, absent mitigation, project-generated construction noise would result in a temporary significant adverse construction noise impact. The analysis was conservatively based on reviewing noise level increases as compared to the existing average L90 noise levels; a further refined analysis, which will include a calibrated modelling of the existing Leq noise levels, will be completed between the draft and final EIS. Mitigations will be developed between the draft and final EIS.

During construction of Projected Development Site 1, the Proposed Actions have the potential to result in significant adverse impacts at the following properties:

- 185 St Marks Place
- 165 St Marks Place
- 41 Hamilton Ave
- 47 Hamilton Ave
- 53 Hamilton Ave
- 59 Hamilton Ave
- 224 Richmond Terrace
- 36 Hamilton Ave
- 60 Hamilton Ave
- 51 Stuyvesant Place
- 140 Richmond Terrace
- 160 Richmond Terrace
- 1 Hamilton Ave
- 205 St. Marks Place
- 199 St. Marks Place
- 198 Richmond Terrace
- 204 Richmond Terrace
- 100 Richmond Terrace

The increase in noise levels at nearby receptors would primarily be due to noise generated by on-site construction activities (rather than construction-related traffic). This noise analysis examined worst-case hourly noise levels that would result from construction in each analyzed quarter and represent the worst-case increase in noise levels from project-generated construction activities. Typically, the loudest hourly noise level during each quarter of construction would not persist throughout the entire quarter, and would be dependent on the specific construction equipment that would be employed for various construction tasks. Furthermore, the actual construction-generated noise would be of less magnitude, in which case construction noise would be less intense than this assessment predicts.

There is no potential for project-on-project significant adverse construction impacts. Construction of Projected Development Site 2 would be complete within 5 quarters (15 months), and construction on this site would commence 6 months after construction of Projected Development Site 1 is complete. The construction noise from Projected Development Site 2 would be classified as short-term per CEQR.

Mitigation

Open Space

In the With-Action Condition, the Study Area's active open space ratio (OSR) would decrease by 12.10 percent and result in a significant adverse open space impact to active open space. Between the No-Action and With-Action conditions, the active OSR would decrease from 0.37 to 0.33 acres per 1,000 residents. The With-Action OSR would be well below the City's planning goal of 2.00 acres of active open space per 1,000 residents.

Potential mitigation measures are currently being explored by the Applicant in consultation with the Department of City Planning (DCP) – the Lead Agency – and the New York City Department of Parks and Recreation (NYC Parks). The potential mitigation measures will be refined between DEIS and the FEIS. The mitigation measures will reflect the nature and scope of the open space impacts, taking into account the quantitative and qualitative assessments in Chapter 3, "Open Space." The *CEQR Technical Manual* lists potential mitigation measures for open space impacts. These measures may include, but are not limited to: creating new open space within the study area; funding for improvements, renovation, or maintenance at existing local parks and/or playgrounds; or improving open spaces to increase their utility or capacity to meet identified open space needs in the area, such as through the provision of additional active open space facilities. Although the mitigation measures being considered would increase the acreage and usability of active recreation resources for the additional population introduced by the Proposed Actions, opportunities to fully mitigate the significant adverse open space impact within the Study Area are very limited. As a consequence, the Proposed Actions' significant adverse open space impact may not be completely eliminated and, as a result, an unavoidable significant adverse open space impact would occur.

Transportation

In the With-Action Condition, the Proposed Actions would result in potentially significant adverse traffic impacts as detailed below. No potentially significant adverse impacts were identified for pedestrians, transit, parking and vehicular and pedestrian safety.

Traffic

As discussed in Chapter 5, "Transportation," the Proposed Actions would result in potentially significant adverse traffic impacts during one or more peak hours at five study area intersections. Specifically, there would be the potential for significant adverse traffic impacts at four intersections during the weekday AM peak hour, four intersections during the weekday midday peak hour, three intersections during the weekday PM peak hour and four intersections during the Saturday midday peak hour (see Table).

Table 4: Summary of Potentially Significant Adverse Traffic Impacts due to the Proposed Actions

ID	Intersection Name (Street Direction)	Weekday AM Peak Hour	Weekday Midday Peak Hour	Weekday PM Peak Hour	Saturday Midday Peak Hour
1	Richmond Terrace (EB/WB) & Jersey Street (NB/SB)	(1) WB Left-Turn (2) WB Through/Right-Turn	(1) WB Through/Right-Turn	(1) WB Through/Right-Turn	(1) WB Through/Right-Turn
2	Richmond Terrace (EB/WB) & Westervelt Avenue (NB)	(1) EB Approach	-	-	(1) EB Approach
6	Richmond Terrace (NB/SB) & Wall Street/Empire Mall Driveway (EB/WB)	(1) WB Approach	(1) WB Approach (2) NB Right-Turn	(1) WB Approach (2) NB Right-Turn	(1) WB Approach (2) NB Right-Turn
7	Victory Boulevard (EB/WB) & Bay Street (NB/SB)	-	(1) NB Left-Turn (2) NB Through/Right-Turn (3) SB Left-Turn/Through	(1) NB Left-Turn	(1) NB Through/Right-Turn (2) SB Left-Turn/Through
11	Hamilton Avenue (EB/WB) & St. Marks Place (NB/SB)	(1) EB Approach (2) WB Approach	(1) EB Approach (2) WB Approach	-	-

Notes:
Abbreviations: EB: Eastbound; WB: Westbound; NB: Northbound; and SB: Southbound.

The potentially significant adverse traffic impacts at ten (10) out of the twenty-four (24) impacted intersection approaches/lane groups (combined for all peak hours) could be mitigated with readily implementable traffic engineering measures, including the modification of traffic signal timings and the installation of All-Way STOP-Control (AWSC). At the intersection approaches/lane groups where no readily available measures have been identified to mitigate the potentially significant adverse traffic impacts, such measures will be explored between the DEIS and FEIS. These additional mitigation measures would be subject to review and approval by the New York City Department of Transportation (NYCDOT). In the

event NYCDOT determines such mitigation measures to be feasible, the FEIS will be updated to reflect that previously-identified unmitigated significant adverse impacts could be mitigated. In the absence of such determination by NYCDOT, the impacts would remain unmitigated.

Furthermore, implementation of the recommended mitigation measures is subject to review and approval by NYCDOT, and these mitigation measures will be further evaluated between the DEIS and FEIS in consultation with the Lead Agency and NYCDOT.

Air Quality

The Proposed Actions would result in a significant adverse air quality impact from mobile sources (traffic) at the intersection of St. Marks Place and Hamilton Avenue. At this intersection, concentrations of $PM_{2.5}$ would have the potential to exceed National Ambient Air Quality Standards (NAAQS) and CEQR *de minimis* thresholds.

The intersection of St. Marks Place and Hamilton Avenue would experience a significant adverse traffic impact that would be fully mitigated with the installation of an all-way STOP-control. This transportation mitigation would significantly reduce the delay times and improve the level of service at this intersection. With implementation of this traffic mitigation, the maximum annual incremental concentration of $PM_{2.5}$ would be significantly lower than the With-Action condition, and would not exceed NAAQS or CEQR *de minimis* thresholds. Therefore, the implementation of the traffic mitigations measures would fully mitigate the significant adverse air quality impact.

Construction

Traffic

As discussed in Chapter 11, "Construction," construction of the Proposed Project could result in potentially significant adverse traffic impacts during at least one of the weekday AM (6:00 AM – 7:00 AM) or PM (3:00 PM – 4:00 PM) construction peak hours at five study area intersections. Specifically, there would be the potential for significant adverse traffic impacts at three intersections during the weekday AM construction peak hour and four intersections during the weekday PM construction peak hour (see Table).

Table 5: Summary of Potentially Significant Adverse Traffic Impacts due to Construction

ID	Intersection Name (Street Direction)	Weekday AM Construction Peak Hour	Weekday PM Construction Peak Hour
1	Richmond Terrace (EB/WB) & Jersey Street (NB/SB)	(1) EB Through/Right-Turn	(1) WB Through/Right-Turn
2	Richmond Terrace (EB/WB) & Westervelt Avenue (NB)	(1) EB Approach	-
3	Richmond Terrace (NB/SB) & Nicholas Street/Parking Garage Driveway (EB/WB)	-	(1) WB Approach
6	Richmond Terrace (NB/SB) & Wall Street/Empire Mall Driveway (EB/WB)	(1) WB Approach	(1) WB Approach (2) NB Right-Turn
7	Victory Boulevard (EB/WB) & Bay Street (NB/SB)	-	(1) SB Left-Turn/Through

Notes:
Abbreviations: EB: Eastbound; WB: Westbound; NB: Northbound; and SB: Southbound.

The potentially significant adverse traffic impacts at five (5) out of the eight (8) total impacted intersection approaches/lane groups (spanning the weekday AM and PM construction peak

hours) could be mitigated with readily implementable traffic signal timing modifications. At the intersection approaches/lane groups where no readily available measures have been identified to mitigate the potentially significant adverse traffic impacts, such measures will be explored between the DEIS and FEIS. These additional mitigation measures would be subject to review and approval by NYCDOT. In the event NYCDOT determines such mitigation measures to be feasible, the FEIS will be updated to reflect that previously-identified unmitigated significant adverse impacts could be mitigated. In the absence of such determination by NYCDOT, the impacts would continue to remain unmitigated.

Furthermore, implementation of the recommended mitigation measures is subject to review and approval by NYCDOT, and these mitigation measures will be further evaluated between the DEIS and FEIS in consultation with the Lead Agency and NYCDOT.

Noise

As described in Chapter 11, "Construction," the Proposed Actions have the potential to result in a temporary significant adverse construction-period noise impact because of the duration and magnitude of the projected construction-period noise levels. Significant adverse construction noise impacts were identified where project-generated construction has the potential to exceed CEQR impact criteria at up to 20 properties.

The Applicant has committed to implementing certain controls that exceed the noise control measures required by the New York City Noise Control Code. These measures include using auger drills in lieu of impact pile drivers and ventilation fans that would not exceed a noise level of 91-dBA and constructing a 15-foot-tall construction barrier that would extend along the full perimeter of the site except along Projected Development Site 1's frontage to Richmond Terrace, where an 8-foot-tall construction barrier would be placed. However, even with these measures, elevated construction-period noise levels are predicted to occur at certain locations.

Additional measures, as feasible, to avoid potential significant adverse noise impacts will be explored between the draft and final EIS in consultation with DCP. If additional path control mitigation measures are not able to be implemented because they are not feasible and practicable mitigation, there would be significant adverse construction-period noise impacts that would remain unmitigated.

Alternatives

No-Action Alternative

In the No-Action Alternative, the Site B portion of Projected Development Site 1 would be developed with a 143,030 gsf building comprising 167 market rate DU (128,169 gsf), 8,240 gsf of retail space, and 12,125 gsf of accessory parking (29 spaces). Of the 131 required parking spaces, 103 would be provided off-site and within 600 feet of Site B. The building would be developed pursuant to R6 height factor regulations. The building base would rise five floors to a height of 60 feet along the Richmond Terrace frontage before a 15-foot setback. The building would then rise six stories before a second setback at the 12th floor. The building would have a roof height of 136 feet. Including a 30-foot-tall bulkhead, the building would be 166 feet tall.

Independent of the Proposed Actions, the Applicant would acquire Tentative Lot 95. Tentative Lot 95 could not be incorporated into Sites A (Lot 100) and B (Lots 82 and 92) because it is needed for the Castleton lot's required open space, and a zoning non-compliance would occur if the tentative lot were subdivided from the Castleton zoning lot under the existing R6 zoning.

At Projected Development Site 2, the two existing two-family houses would remain as existing conditions. Lot 68 would remain vacant.

Compared to the Proposed Actions, the No-Action Alternative would contain less development and generate fewer demands for community resources such as schools, open space, transportation, and sewers. However, the No-Action Alternative would not achieve the goals and objectives as described in the "Purpose and Need" section of the Project Description, specifically in regards to increasing housing supply in the area and the provision of affordable units. Further, the No-Action Alternative has the potential to result in more hazardous materials, air quality, and noise effects than the Proposed Actions because new developments would not have the regulatory oversight provided through the City's (E)-Designation program.

No Unmitigated Significant Adverse Impacts Alternative

The Proposed Actions would result in significant adverse open space and transportation impacts. The Open Space Study Area is deficient of active open space and is well below the City's planning goal of 2.0 acres of active open space per 1,000 residents. The Proposed Actions would decrease the residential active OSR by more than five percent. To reduce the residential active OSR by less than five percent to avoid a significant adverse impact to active open space, the Proposed Actions' residential component would have to be reduced by 50 percent (by 453 DU, from 897 DU to 444 DU). This reduction would substantially reduce the project so that it would no longer meet the Purpose and Need of the Proposed Actions.

Alternatively, 0.40-acres of active open space could be provided to reduce the active OSR by less than five percent. Similar to the Proposed Actions, the No-Unmitigated Significant Adverse Impact Alternative could not feasibly provide the acreage of active recreational space needed to mitigate the open space impact due to the limited availability of land and the topography of the development sites. In the No Unmitigated Significant Adverse Impacts Alternative, measures similar to the mitigations for the Proposed Actions would be necessary to avoid a significant adverse open space impact.

The proposed mitigation measures for Transportation are typical improvement measures, such as modification of traffic signal phasing and/or timing. These improvements are routinely identified by the City and considered feasible for implementation. Implementation of the recommended traffic engineering improvements outlined in Chapter 13, "Mitigation," is subject to review and approval by NYCDOT. In the absence of the application of mitigation measures, the impacts would remain unmitigated and would constitute significant adverse unavoidable traffic impacts.

Unavoidable Adverse Impacts

The Proposed Actions would result in significant adverse impacts to open space and transportation. Mitigation is being considered to the extent practicable for these identified significant adverse impacts. However, in some instances no practicable mitigation would be able to fully mitigate significant adverse impacts, and no reasonable alternatives would meet the purpose and need of the project, eliminate their impacts, or not cause other or similar significant adverse impacts.

Growth-Inducing Aspects of the Proposed Actions

The Proposed Actions would allow more intensive land uses within the Rezoning Area, and would increase the demand for local neighborhood services such as community facilities, and local retail. The increased demand for these services would largely be satisfied by the existing

commercial and community facilities in Downtown Staten Island. The Proposed Actions would also facilitate smaller local retail spaces on the development sites that would support the proposed residential uses.

The Proposed Actions would increase the zoning capacity in the area of Block 13 within 185 feet of Richmond Terrace and Stuyvesant Place, and would not increase zoning capacity outside of this area. Further, the Proposed Actions would not introduce new infrastructure (e.g., develop a sewer line in an area not currently served by sewers) or greatly increase infrastructure capacity that would induce or unlock development in secondary areas. The Proposed Actions would allow infill development on the projected development sites, which are in a well-established urban area near existing infrastructure; therefore, the Proposed Actions have minimal potential induce notable growth outside of the two projected development sites.

Irreversible and Irretrievable Commitments of Environmental Resources

Both natural and manufactured resources would be used in the demolition, construction, and operation of the project-generated development. These resources include time and materials used in construction; energy (gas and electricity) consumed during the construction and operation of project-generated development; and human effort (time and labor) required to design, plan, develop, construct, and operate various components of the project-generated development. These resources very likely could not be reused and are thus considered permanently committed to future development resulting from the Proposed Actions.

In the With-Action Condition, the Applicant would develop a private open area between Buildings 2 and 3, and a publicly accessible private open space at the intersection of Hamilton Avenue and Stuyvesant Place, next to the base of Building 1. During construction, some existing overgrowth vegetation would be permanently removed and replaced with native species in targeted areas throughout the site.

The Proposed Actions would facilitate development on two development sites, and would therefore create a long-term commitment of land resources. This commitment of land would render the proliferation of other land uses on the development sites highly unlikely. The Proposed Actions would not allow uses not already permitted under existing zoning; therefore, the proposed land uses would be compatible with the surrounding area. Targeted infill development would be similar to other recent and ongoing land use and development trends in Downtown Staten Island, typified by developments such as Lighthouse Point. Funds and human efforts committed to the planning, design, construction, and operation of project-generated development would not be available for other projects.

Per the *CEQR Technical Manual*, in considering the trade-offs of the project, short-term losses are weighed against the long-term benefits of the Proposed Actions. The Proposed Actions would respond to multiple land use goals and objectives outlined in public policies such as OneNYC, Housing New York, and North Shore 2030. The Proposed Actions would facilitate housing (including affordable options) collocated with local retail and accessory parking. A portion of privately owned land would be dedicated to a publicly accessible open space, introducing a new community amenity. Losses of vegetative overgrowth on the development sites would allow mixed-use, infill development proximate to transit that would be compatible with the goals of public policies, other nearby infill developments and land uses in Downtown Staten Island.