20 ALTERNATIVES

20.1 Introduction

As described in the *2021 CEQR Technical Manual,* the State Environmental Quality Review Act (SEQRA) requires that alternatives to the proposed project be identified and evaluated in an Environmental Impact Statement (EIS). An alternatives assessment considers whether reasonable alternatives exist that would minimize or avoid adverse environmental effects. This EIS considers reasonable alternatives to the Proposed Actions that have the potential to feasibly reduce or eliminate impacts while still meeting the Purpose and Need of the project.

The Applicant, Westfarms Realty LLC and 1480 Sheridan Realty LLC, seeks a series of discretionary land use actions, including a zoning map amendment, a zoning text amendment, zoning authorization(s), and waterfront zoning certifications from the City Planning Commission (CPC) (collectively, the "Proposed Actions"). Discretionary financing is also being sought for affordable housing form the New York City Department of Housing Preservation and Development (HPD), as well as waterfront actions from the New York State Department of Environmental Conservation (NYSDEC) and the US Army Corps of Engineers (USACE) ~~(collectively, the "Proposed Actions")~~. The Proposed Actions would apply to the "Proposed Rezoning Area," the portion of Bronx Block 3017 bound by Sheridan Boulevard, Starlight Park, the western pierhead and bulkhead line of the Bronx River, the Amtrak right-of-way, and a line 300 feet from Westchester Avenue. The Proposed Rezoning Area contains Bronx Block 3017, Lots 29, 60, 65, 68, and 74, and portions of Lots 6 and 28. The Proposed Actions would enable the development of approximately 866,017 gross-square-feet (gsf) of floor area within three buildings across two projected development sites in the Crotona Park East neighborhood of Community District 9, the Bronx. The Proposed Actions would also provide new public access to the Bronx River's shoreline through shore public walkways, an upland connection~~s~~, and a connection to Starlight Park.

In addition to the Applicant's sites, the Proposed Rezoning Area includes "Potential Development Site A," which comprises Lots 60, 65, and 68 of the Proposed Rezoning Area.

These three lots are not controlled or owned by the Applicant but have the potential to be merged into one zoning lot and redeveloped with adoption of the Proposed Actions. Based on the Reasonable Worst Case Development Scenario (RWCDS) established for this project, Potential Development Site A, if redeveloped, would contain an approximately 380,025-gsf mixed-use building.

This assessment contemplates two alternatives to the Proposed Actions:

1. The No-Action Alternative: An analysis of a No-Action Alternative is mandated by SEQRA and CEQR and demonstrates the environmental conditions that would exist if the Proposed Actions were not adopted. This alternative is equivalent to the No-Action Condition.
2. The No Unmitigated Impact Alternative: This alternative eliminates unmitigated impacts resulting from the Proposed Actions. The Proposed Actions would still result in significant adverse impacts to transportation (vehicular traffic and pedestrian circulation) and construction (traffic), but these construction impacts could be fully mitigated.

20.2 Principal Conclusions

In the No-Action Alternative, existing conditions in the Proposed Rezoning Area are expected to remain. Compared to the Proposed Actions, the No-Action Alternative would not provide affordable housing, publicly accessible open space, and other site improvements. There would be no additional demands for community resources such as schools, open space, and transportation. The No-Action Alternative would not result in a significant adverse impact (as defined by the *CEQR Technical Manual*); however, the No-Action Alternative would not achieve the purpose and need of the Proposed Actions because there would be no affordable housing, publicly-accessible open space, and other project improvements.

As described in the No Unmitigated Impact Alternative, the Proposed Actions would result in significant adverse impacts in the areas of transportation (traffic and pedestrian) and construction traffic. Potentially significant adverse operational and construction traffic impacts could result from the Proposed Development during one or more peak hours at up to five intersection approaches/lane groups at five study area intersections. The operational traffic and construction traffic impacts ~~can~~ could be mitigated with signal timing changes, ~~which would be reviewed by~~subject to New York City Department of Transportation (NYCDOT) ~~and implemented upon NYCDOT~~ approval. In order to determine the feasibility of these proposed traffic signal timing modifications, the Applicant has committed to undertake a transportation monitoring program (TMP), subject to NYCDOT approval. If, based on the TMP, any of the proposed mitigation measures are deemed to be infeasible and no alternative mitigation measures can be identified, then the significant adverse traffic impacts would become unmitigated.

The Proposed Actions also have the potential to result in significant adverse pedestrian impacts during one or more peak hours at up to seven pedestrian elements at four study area intersections. Significant adverse impacts occurring at four of the pedestrian elements can be mitigated with readily implementable engineering measures, including the installation of a physical corner extension, crosswalk widening, and the relocation of an existing signpost. However, three pedestrian elements that could experience

potentially significant adverse impacts would remain unmitigated with the Proposed Actions.

To determine the No Unmitigated Impact Alternative, a sensitivity analysis was completed to determine the amount by which the project would need to be reduced to eliminate the unmitigated pedestrian impacts. The sensitivity analysis found that the development program would need to be reduced by 55 percent (to 45 percent of the total program) for the pedestrian impacts to be fully mitigated. Reducing the program by 55 percent would result in 437 affordable dwelling units (a reduction of 533 affordable units), 9,553 gsf of retail, and 0.58 acres of publicly-accessible open space. The analysis concluded that this program reduction would compromise the purpose and need of the Proposed Actions to maximize the amount of affordable housing that would be produced.

20.3 No-Action Alternative

In the No-Action Alternative, existing conditions in the Proposed Rezoning Area are expected to remain. A one-story, approximately 14,000-gsf automobile mechanic training facility would remain on Projected Development Site 1. On Projected Development Site 2, an open parking facility with four connected accessory office buildings, and garage would remain as existing conditions. Potential Development Site A is expected to remain improved with a hotel, an open truck parking facility, and a vacant industrial building.

Compared to the Proposed Actions, the No-Action Alternative would contain less new development and would generate fewer demands for community resources such as schools, open space, and transportation. However, the No-Action Alternative would not achieve the goals and objectives of the Proposed Actions as described in the "Purpose and Need" section of the Project Description because:

- The No-Action Alternative would not provide affordable housing or expand the housing supply in Crotona Park East. The No-Action Alternative would not result in any affordable residential units, as compared to the 970 affordable residential units projected with the Proposed Actions.
- The No-Action Alternative would not provide public access to the Bronx River waterfront within the Proposed Rezoning Area. The No-Action Alternative would not support the goals to "explore zoning to promote affordable housing" and "improve waterfront connections," which are goals outlined in New York City (NYC) Department of City Planning's (DCP) 2016 *Southern Boulevard Neighborhood Study*.
- Privately-owned, publicly accessible open space would not be developed on Projected Development Sites 1 and 2 in the No-Action Alternative, and these sites would remain inaccessible to the public. With the Proposed Actions, new publicly accessible open space would be developed on the development sites, including a shore public walkway along the Bronx River. The design, construction, and maintenance of the open spaces on the projected development sites would be the responsibility of the Applicant.
- Stormwater generated on the development sites would continue to be discharged directly to the Bronx River in the No-Action Alternative. These discharges may not comply with current NYSDEC standards. Stormwater discharged directly to the Bronx River with the Proposed Actions would comply with the latest NYSDEC standards, thereby improving water quality conditions for the Proposed Actions over the No-Action Alternative.

- In the No-Action Alternative, E-Designations would not be mapped on the development sites. With no E-Designations in the No-Action Alternative, there would be no oversight by the New York City Mayor's Office of Environmental Remediation (OER) for hazardous materials, air quality, or noise. Therefore, new development in the Proposed Rezoning Area would not have the regulatory oversight provided through the City's E-Designation program.

Further analysis is provided below for each CEQR technical area analyzed in this Draft Environmental Impact Statement (DEIS).

Land Use, Public Policy, and Zoning

Similar to the Proposed Actions, the No-Action Alternative would not result in a significant adverse land use, public policy or zoning impacts. In the No-Action Alternative, the development sites would not be rezoned and new commercial or residential uses would not be developed in the Proposed Rezoning Area. The development sites would not be established as a Mandatory Inclusionary Housing (MIH) area and new publicly accessible open space on privately owned land would not be provided. Existing land use and zoning conditions would continue in the No-Action Alternative. The existing light industrial uses on the site would not support local policies such as the *Southern Boulevard Neighborhood Study*, which seeks to promote affordable housing and provide the public with access to the waterfront in the Proposed Rezoning Area. Public access would continue to be unavailable along the waterfront of the Project Site and pedestrian pathways would not be available to and from Starlight Park. The No-Action Alternative would not support the *Bronx River Greenway Plan*, which plans to create a 23-mile continuous bike and pedestrian path from the Bronx to Westchester County. The No-Action Alternative also would not support Policy 8 of the NYC Waterfront Revitalization Program (WRP), which encourages public access to, from and along New York City's coastal waters. The existing structures on the Project Site would impede views and access to the Bronx River waterfront. The No-Action Alternative would not complement the current development trends in Crotona Park East, as much of the neighborhood's new development contains residential and commercial uses. Accordingly, neither the No-Action Alternative nor the Proposed Actions would result in a significant adverse land use, zoning, and public policy impact.

Socioeconomic Conditions

In the No-Action Alternative, existing conditions would remain. The No-Action Alternative would not introduce a new residential population, nor would increase the demands for goods and services in the surrounding area. Unlike the Proposed Actions, the No-Action Alternative would not displace existing businesses and would not have the potential to affect real estate market conditions. Further, the No-Action Alternative would not provide new commercial uses or generate new employment opportunities. Additionally, unlike the Proposed Actions, the No-Action Alternative would not increase the supply of affordable housing in the Study Area, and would result in 970 fewer affordable DUs (at least 20 percent of which would be permanently affordable) compared to the Proposed Actions.

The No-Action Alternative would not directly or indirectly displace residents or expand the housing supply in Crotona Park East. The number of low-income residents in the Socioeconomic Conditions Study Area that are potentially vulnerable to indirect

residential displacement would be the same in the No-Action Alternative as with the Proposed Actions. The Proposed Actions' affordable housing would increase the options for affordable housing in the neighborhood. Accordingly, neither the No-Action Alternative nor the Proposed Actions would result in a significant adverse socioeconomics impact.

Community Facilities and Services

The No-Action Alternative would not introduce 970 new affordable dwelling units to the development sites, nor result in approximately 2,735 additional residents. Similar to the Proposed Actions, the No-Action Alternative would not have a significant adverse impact in the areas of public schools, healthcare facilities, fire/police protection, public libraries, or publicly funded early childhood centers. The No-Action Alternative would not introduce new public school students to the school subdistrict or additional children that would be eligible for publicly-funded early childhood centers. The No-Action Alternative would have a surplus of 1,064 elementary school seats (85 percent utilization) and 68 intermediate school seats (96 percent utilization). There would be a surplus of 458 (80 percent utilization) publicly funded early childhood center seats in the No-Action Alternative. The library holdings-per-resident would decrease from 0.40 to 0.38 in the No-Action Alternative based on population growth in the Study Area. Similar to the No-Action Alternative, the Proposed Actions would reduce the library holdings-per-resident in the Study Area from 0.38 to 0.37. In the No-Action Alternative, the population near the development sites would continue to grow and unlike the Proposed Actions, the No-Action Alternative would not increase enrollment of intermediate school students beyond 100 percent. Accordingly, neither the No-Action Alternative nor the Proposed Actions would result in a significant adverse impact to community facilities and services.

Open Space

Neither the No-Action Alternative nor the Proposed Actions would ~~physically alter or~~ displace an existing publicly accessible open space. The No-Action Alternative would not introduce new residents, a new publicly accessible open space, and or displace an existing public open space. The No-Action Alternative's open space ratio (OSR) would be less than the CEQR guideline of 2.5 acres per 1,000 residents. The active OSR of 0.1994 acres per 1,000 residents would be 10 percent of the goal of 2.0 acres per 1,000 residents that is recommended in the *CEQR Technical Manual*. The passive OSR of 0.3322 acres per 1,000 residents would be 66 percent of the *CEQR Technical Manual*'s goal of 0.50 acres per 1,000 residents. With no new public open space provided in the No-Action Alternative, there would continue to be a deficit of passive and active open space in the No-Action Alternative. Accordingly, neither the No-Action Alternative nor the Proposed Actions would result in a significant adverse open space impact.

The Proposed Actions would introduce 1.38 acres of new public open space comprising waterfront public access areas (WPAAs) and additional open space that would provide views of the Bronx River, Starlight Park, and other nearby visual resources. The project-generated open space would be developed with WPAAs, which would comprise interconnected shore public walkways and an upland connection~~s~~. The design, construction, and maintenance of the open space on the projected development sites would be the responsibility of the Applicant. With the Proposed Actions, the active open space ratio would increase by 0.0001 points and the passive open space would decrease

by 0.0011 points. The Proposed Actions would result in an OSR decrease of 0.192 percent over the No-Action Alternative.

Public open space along the northern lot line of Projected Development Site 1 would provide an additional pedestrian connection to Starlight Park near the waterfront. This new connection would create an entry into the Proposed Rezoning Area's proposed open space network, allowing for continuous public access from Starlight Park to the proposed shore public walkway via a new staircase within Starlight Park. The maintenance of this connection would be the responsibility of the Applicant. In the No-Action Alternative, this connection would not be provided.

In the No-Action Condition, the fence surrounding the inaccessible public storage area of Starlight Park within the demapped portion of East 172nd Street (between Sheridan Boulevard and the Bronx River) would remain as existing conditions. With the Proposed Actions, the existing fence would be relocated east towards the Bronx River – thereby opening more area of the park to regular public access. The Applicant proposes to fund, design, construct, and maintain an approximately 2,800-square-foot portion of the paved area with pervious grass pavers;[1] these proposed improvements would not occur in the No-Action Alternative.

Shadows

In the No-Action Alternative, existing conditions would remain in the Proposed Rezoning Area. Like the Proposed Actions, shadow from the No-Action Alternative would be cast on the Bronx River and Starlight Park for portions of the four CEQR analysis days. In the No-Action Alternative, shadow from existing buildings in the Proposed Rezoning Area would continue to be cast on Starlight Park beginning in the morning and on the Bronx River beginning in the afternoon. Shadows generated by buildings in the Proposed Rezoning would not be cast on Daniel Boone Playground, PS X811's blacktop, or PS66 in the No-Action Alternative during the CEQR analysis periods. With the Proposed Actions, incremental shadow would not result in significant adverse impacts to any of the Study Area's sunlight-sensitive resources; thus, the No-Action Alternative – which would have shorter buildings – also would not have the potential to result in significant adverse shadow impacts. The No-Action Alternative's shorter buildings are likely to result in fewer shadows – in terms of both duration and footprint – than the Proposed Actions.

Incremental shadow from the Proposed Actions could be cast on several resources proximate to the Proposed Rezoning Area, including the Bronx River, Daniel Boone Playground, the blacktop at PS X811, the schoolyard at PS 66, and Starlight Park. Incremental shadow would not result in a significant adverse impact to Daniel Boone Playground, the blacktop at PS X811, the schoolyard at PS 66, or Starlight Park. The Bronx River would receive several hours of incremental shadow in the late afternoon periods on all four analysis days. However, the Bronx River is a long, intertidal waterbody with conditions that are unfavorable for submerged aquatic vegetation near the Proposed Rezoning Area. Phytoplankton available for secondary consumers (such as fish) in this portion of the Bronx River likely would not be significantly altered with the Proposed

[1] The maintenance obligations and permit requirements will be codified in a maintenance and operations agreement between the Applicant and the City, and in the Restrictive Declaration for the 1460-1480 Sheridan Boulevard Waterfront Actions land use application.

Actions because of the availability of sunlight along other portions of the river and the river's tidal nature. Incremental shadow would not preclude fish migration along the Bronx River; however, during times of incremental shadow, fish – including alewife, blueback herring, and American eel – may experience a temporary reduction in cues from direct sunlight as they transit through areas of incremental shadow between spawning/juvenile habitats farther upstream and locations farther downstream. To lessen the effects of such shading, several restoration measures would be incorporated into the Proposed Development. The Proposed Development would increase vegetation along the shore public walkway to provide a greater quantity of ~~proposed restoration measures include provision of~~ shade-tolerant tree species. The Applicant would also provide ~~and~~ informational signage along the shore public walkway to educate the public on local fish species and provide ~~near the shoreline; provision of~~ funding ~~for marshland vegetation plantings, or other mutually agreed upon measure,~~ to improve fish ~~habitat~~passage over the Starlight Park weir at low tide in the vicinity of the Project Site (in coordination with New York City Department of Parks and Recreation [NYC Parks])~~; and pending New York State Department of Environmental Conservation (NYSDEC) approval, installation of sufficiently sized submerged reef balls or similar structures to increase habitat complexity for migratory fish and shellfish~~. ~~Details of t~~These proposed measures ~~are being~~have been developed in coordination with New York City Department of Environmental Protection (NYCDEP) and NYC Parks~~ and will be finalized before the Final EIS is issued. These commitments~~ and would be memorialized in a Restrictive Declaration tied to Projected Development Sites 1 and 2. Accordingly, neither the No-Action Alternative nor the Proposed Actions would result in a significant adverse shadows impact.

Historic and Cultural Resources

Similar to the Proposed Actions, the No-Action Alternative would not have the potential to result in significant adverse historic and cultural resource impacts. In a letter dated December 1, 2021, the Landmarks Preservation Commission (LPC) indicated that the Proposed Rezoning Area does not contain architectural or archaeological historic resources. In the No-Action Alternative, existing conditions are projected to continue, and no new ground disturbance would occur in the Proposed Rezoning Area.

The historic and cultural resources within a 400-foot radius of the Proposed Rezoning Area (the "Historic and Cultural Resources Study Area") include the Amtrak Northeast Corridor Line Bascule Bridge, the IRT No. 6 Subway Truss Bridge, and the Westchester Avenue Bridge. In the No-Action Alternative, views from Sheridan Boulevard and through the Proposed Rezoning Area to the Amtrak Northeast Corridor Line Bascule Bridge would continue to be largely obstructed by existing buildings.

While the Proposed Actions may further obstruct some long-range partial views of the Study Area's historic resources because of lager and taller buildings, new publicly accessible views would be made available from the proposed shore public walkway that would allow for nearer and more complete views of the waterfront area and the Study Area's historic resources. Like the Amtrak Bascule Bridge, publicly accessible views of the IRT No. 6 Subway Truss Bridge and the Westchester Avenue Bridge from Sheridan Boulevard would continue to be largely obstructed by the buildings that would remain in the No-Action Alternative. Short-range views of these resources would continue to be available with minimal obstructions from locations along Westchester Avenue. Overall, long-range views from Sheridan Boulevard or Starlight Park to the Study Area's historic and cultural resources may be further obstructed with the Proposed Actions; however,

new publicly accessible views would be made available from the proposed shore public walkway, which would not be available in the No-Action Alternative. Therefore, the No-Action Alternative, as well as the Proposed Actions, do not have the potential to result in significant adverse historic and cultural resource impacts.

Urban Design and Visual Resources

Like the Proposed Actions, the No-Action Alternative does not have the potential to result in significant adverse urban design and visual resource impacts. Visual resources within the Urban Design and Visual Resources Study Area include Starlight Park, the Bronx River, Daniel Boone Playground, the Amtrak Northeast Corridor Line Bascule Bridge, the IRT No. 6 Subway Truss Bridge, and the Westchester Avenue Bridge. In the No-Action Alternative, no new construction would occur, and the views of visual resources would remain as existing conditions. No public access would be developed to the Bronx River waterfront.

With the Proposed Actions, the redevelopment of the projected development sites would provide an extension of waterfront access along the Bronx River. A shore public walkway would provide new visual and physical connections to the waterfront. The Proposed Actions would result in an improvement to the publicly accessible views to several of the Study Area's visual resources – particularly the Bronx River, the Amtrak Bascule Bridge, and Starlight Park – over the No-Action Alternative by introducing a network of open spaces on the development sites' waterfront.

Compared to the No-Action Alternative, the Proposed Actions would allow buildings up to a roof height of 225 feet tall (240 feet including the mechanical bulkhead). These 24-story buildings would be up to 21 stories taller than the existing buildings that would remain on the Projected Development Sites in the No-Action Alternative. Unlike the No-Action Alternative, the Proposed Actions would introduce new active ground floor uses along Sheridan Boulevard, such as residential lobbies and commercial space. In addition, the Proposed Actions would introduce 1.38 acres of additional open space that would not exist in the No-Action Alternative.

Natural Resources

The No-Action Alternative does not have the potential to result in significant adverse natural resource impacts. Both the terrestrial and aquatic portions of the development sites are largely developed, with little vegetation. The development sites are nearly entirely impervious, except for overgrowth vegetation including both invasive and non-invasive tree species near the waterfront. The Proposed Rezoning Area is not anticipated to serve as a habitat for significant populations of wildlife. Stormwater generated on the development sites in the No-Action Alternative would continue to discharge directly to the Bronx River. Further, the existing waterfront structures adjacent to the Proposed Rezoning Area may not prevent the migration of in-ground hazardous materials into the Bronx River. In the No-Action Alternative, no remedial actions would occur on the development sites and no E-Designation would be mapped for hazardous materials.

With the Proposed Actions, new flora would be introduced on the development sites and could create new potential habitat for wildlife such as insects and birds. Additionally, to lessen the effects of shading on the Bronx River, several restoration measures would be incorporated into the Proposed Development. The proposed restoration measures include an increase in the amount of vegetation along the onsite shore public walkway to

provide a greater quantity ~~provision of~~ shade-tolerant tree species; ~~and~~ informational signage along the shore public walkway to educate on local fish species~~near the shoreline~~; and, ~~provision of~~ funding ~~for marshland vegetation plantings, or other mutually agreed upon measure,~~ to improve fish passage over the Starlight Park weir at low tide ~~habitat~~ in the vicinity of the Project Site (in coordination with NYC Parks)~~; and pending NYSDEC approval, installation of sufficiently sized submerged reef balls or similar structures to increase habitat complexity for migratory fish and shellfish~~. ~~Details of t~~These proposed measures ~~are being~~have been developed in coordination with NYCDEP and NYC Parks ~~and will be finalized before the Final EIS is issued~~ and ~~. These commitments~~ would be memorialized in a Restrictive Declaration tied to Projected Development Sites 1 and 2. With the Proposed Actions, remedial actions would be undertaken to reduce the potential for hazardous materials to migrate to the Bronx River, and stormwater would be treated before discharged to the Bronx River in accordance with current NYSDEC standards. Accordingly, the Proposed Actions would likely improve the Bronx River's water quality over the No-Action Alternative.

Hazardous Materials

The Phase I Environmental Site Assessment (ESA) identified several Recognized Environmental Conditions (RECs)[2] at the projected development sites. Excavation in the Proposed Rezoning Area could increase pathways for human exposure to hazardous materials that may exist on these sites. While the No-Action Alternative would not include any excavation of the projected development sites, nor introduce new activities or a new population, it also would not introduce regulatory mechanisms to the Proposed Rezoning Area for hazardous materials.

With the Proposed Actions, significant adverse hazardous materials impacts would be avoided by mapping an E-Designation on the development sites, which would mandate coordination with OER to satisfy the E-Designation requirements prior to the issuance of construction permits by the New York City Department of Buildings. For the projected development sites (the Applicant-owned sites) and Potential Development Site A, such requirements of the E-Designation would include, as warranted:

- Submit a Phase I ESA to OER;
- Prepare a Remedial Action Work Plan (RAWP) and Construction Health and Safety Plan (CHASP) to be implemented during the subsurface disturbance; and
- Submit a Remedial Investigation Report to OER to determine if further remediation is necessary.

Conversely, the No-Action Alternative would not introduce an oversight mechanism for hazardous materials that may exist on the development sites, and new ground disturbance could potentially increase pathways for human exposure to hazardous materials. Accordingly, the Proposed Actions would better protect the environment from potential exposure to hazardous materials than the No-Action Alternative.

[2] Per the American Society for Testing and Materials (ASTM) E1527-13 (Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process), an REC is defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property related to a release.

Water and Sewer Infrastructure

The No-Action Alternative would not result in any significant adverse impacts to water supply, wastewater conveyance and treatment, or stormwater management. The No-Action Alternative would not increase the water demand in the Proposed Rezoning Area over existing conditions and would not require new sewer connections. The development sites would remain nearly wholly impervious and would continue to be occupied by industrial uses and a hotel. The No-Action Alternative would generate more stormwater runoff than the Proposed Actions because of the impervious surface that would remain in the No-Action Alternative. The existing stormwater outfalls along the Bronx River would not be improved to current NYSDEC standards.

Like the No-Action Alternative, the Proposed Actions would have no significant adverse impacts to water supply, wastewater conveyance and treatment, or stormwater management. However, the Proposed Actions would introduce new permeable surfaces such as grass and softscape, as required by waterfront zoning. This additional permeable surface area would increase the development site's capacity to absorb stormwater compared to existing conditions. New sewer connections would be required for the project-generated buildings and would be subject to the City's Unified Stormwater Rule. Because of this, the runoff coefficient with the Proposed Actions would be less than that of the No-Action Alternative. Additionally, stormwater outfalls at the Bronx River would be reconstructed in accordance with current NYSDEC standards with the Proposed Actions.

Transportation

In the No-Action Alternative, traffic volumes, pedestrian volumes, parking demand, and transit volumes in the study area would be expected to increase because of background growth and other planned development in the Study Area. Thus, overall traffic operating conditions would be expected to deteriorate in the No-Action Alternative as compared to existing conditions. Independent of the Proposed Actions, changes to traffic signal timing and the travel lane, bicycle lane and curbside parking configurations on Westchester Avenue are being implemented by NYCDOT as a part of the *Westchester Avenue, Southern Boulevard to Whitlock Avenue Safety Improvement Project* (SIP).

Traffic

In the No-Action Alternative, three of the 20 total intersection approaches/lane groups in the Transportation Study Area would operate at a Level of Service (LOS) E or worse in at least one peak hour. LOS E typically describes very heavy delays and includes poor progression, long cycle lengths, and high volume-to-capacity ratios. Absent measures to reduce these delays, the following intersections would experience a LOS E or worse during peak hours:

- The northbound left-turn at the Sheridan Boulevard and Edgewater Road intersection, opposite Jennings Street, during the weekday AM, midday, PM, and Saturday midday peak hours.
- The southbound left-turn at the Westchester Avenue and Whitlock Avenue intersection, during the weekday PM peak hour.
- The southbound through and through/right-turn at the Westchester Avenue and Whitlock Avenue intersection, during the weekday AM and midday peak hours.

Conversely, with the Proposed Actions, five of the 20 total intersection approaches/lane groups in the Transportation Study Area would operate at LOS E or worse in at least one peak hour in the absence of mitigation. These intersections would include:

- The westbound approach at the Sheridan Boulevard and Edgewater Road intersection, opposite Jennings Street, during the weekday AM peak hour.
- The northbound left-turn at the Sheridan Boulevard and Edgewater Road intersection, opposite Jennings Street, during the weekday AM, midday, PM, and Saturday midday peak hours.
- The northbound through/right-turn at the Westchester Avenue and Edgewater Road intersection during the weekday PM peak hour.
- The southbound left-turn at the Westchester Avenue and Whitlock Avenue intersection during the weekday PM and Saturday midday peak hours.
- The southbound through and through/right-turn at the Westchester Avenue and Whitlock Avenue intersection during the weekday AM and midday peak hours.

With the Proposed Actions, the significant adverse traffic impacts at all five impacted intersection approaches/lane groups could be fully mitigated with the modification of traffic signal timings. The proposed traffic signal timing modifications would be subject to review and approval by NYCDOT, and the Applicant will undertake a post-implementation TMP to further evaluate the proposed mitigation measures. The Applicant has committed to undertaking the TMP in a Restrictive Declaration to be recorded with the Developments Sites.

Pedestrians

In the No-Action Alternative, no new development would occur on the development sites. All pedestrian elements in the Study Area would operate at a LOS C or better, and the No-Action Alternative would not have the potential to result in a significant adverse impact.

With the Proposed Actions, significant adverse pedestrian impacts would occur at seven pedestrian elements in at least one peak hour. The significant adverse pedestrian impacts at four out of the seven impacted pedestrian elements could be fully mitigated with readily implementable engineering measures. For the pedestrian elements where readily available mitigation measures have not been identified, potential alternative measures ~~will be~~were explored between the DEIS and FEIS in consultation with DCP and NYCDOT. In absence of mitigation measures, the Proposed Actions would result in unmitigated significant adverse impacts.

Transit

In the No-Action Alternative, transit volumes would be expected to increase as a result of background growth and other planned development in the Study Area. The Proposed Actions would not introduce new travel demands in the Proposed Rezoning Area over existing conditions. Therefore, like the Proposed Actions, the No-Action Alternative would not result in a significant adverse transit impact.

Parking

The No-Action Alternative would not result in a parking shortfall, and the parking facility on Projected Development Site 2 would remain as existing conditions. Additionally, the

No-Action Alternative would not provide 100 new below-grade parking spaces to the Proposed Rezoning Area.

With the Proposed Actions, a parking shortfall of 215 spaces could occur during the weekday overnight period. However, the public parking demand generated by the Proposed Actions would be accommodated by the future supply of on- and off-street public parking spaces within ½-mile of the Proposed Rezoning Area during the weekday midday, weekday overnight, Saturday midday and Saturday overnight periods. Therefore, like the Proposed Actions, the No-Action Alternative would not result in a significant adverse parking impact.

Air Quality

In the No-Action Alternative, the Applicant's sites would remain as existing conditions, and would not generate additional passenger-car-equivalent trips on the surrounding street network. Mobile source emissions would nominally increase over existing conditions because of background traffic growth and the resulting traffic delays. Similar to the Proposed Actions, the No-Action Alternative would not result in significant adverse air quality impacts from mobile source emissions.

The mechanical systems serving the existing industrial buildings may not comply with current mechanical code and may release pollutants of concern into the atmosphere. These uses would continue in the No-Action Alternative. With the Proposed Actions, new development would replace the existing industrial uses with new buildings that would comply with New York City Mechanical Code.

In the No-Action Alternative, an E-Designation would not be mapped on the development sites. With the Proposed Actions, an E-Designation would be mapped on the projected and potential developments sites, which would require coordination with OER post-rezoning to ensure that significant adverse air quality impacts would be avoided. With the E-Designation in place, OER's oversight would ensure project-generated buildings do not have the potential to result in unacceptable air quality conditions at surrounding receptors.

With both the Proposed Actions and the No-Action Alternative, the unregistered autobody spray painting on Lot 28 would continue. However, in the No-Action Alternative, no retail or residential uses – uses that are sensitive to air quality conditions per CEQR – would be introduced in the Proposed Rezoning Area.

Greenhouse Gas (GHG) Emissions and Climate Change

The No-Action Alternative is not projected to result in new development in the Proposed Rezoning Area over existing conditions. Because the Proposed Actions would not result in a significant adverse GHG Emissions and Climate Change impact and the No-Action Alternative would generate less GHG emissions from traffic and construction than the Proposed Actions, neither the Proposed Actions nor the No-Action Alternative would result in a significant adverse GHG emissions or climate change impact. However, the Proposed Actions would allow the development of 970 affordable residential units above ground floor commercial space in an area that is well served by public transit, and therefore would better align with the City's goal to reduce GHG emissions by 2050 by providing affordable housing that is proximate to public transit.

Noise

Neither the No-Action Alternative nor the Proposed Actions would generate sufficient traffic to result in a significant adverse noise impact from mobile sources. Additionally, the No-Action Alternative would not introduce new noise sources over existing conditions; therefore, the No-Action Alternative would not result in a significant adverse noise impact. In the No-Action Condition, an E-Designation would not be mapped on the development sites.

The Proposed Actions would allow the development of 970 affordable dwelling units across the projected development sites. The design and specifications of mechanical systems (such as HVAC) of the project-generated buildings would adhere to 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) and ensure that the equipment would not significantly increase the ambient noise levels. An E-Designation would provide oversight from OER to ensure that sufficient noise attenuation is provided so that noise-sensitive uses would experience an acceptable interior L_{10} noise level (for residential uses, not greater than 45 dB(A) and interior L_{dn} noise level not greater than 40 dB(A)).

Compared to the Proposed Actions, the No-Action Alternative would not map an E-Designation across the projected development sites and new development would not be required to meet the interior noise level requirements of the *CEQR Technical Manual*. Therefore, the No-Action Alternative would not provide the same level of protections as the Proposed Actions with respect to new noise-sensitive uses that may be introduced to the Rezoning Area.

Public Health

Unlike the Proposed Actions – which would map an E-Designation for hazardous materials, air quality, and noise at the development sites – the No-Action Alternative would not be required to perform any investigation or remedial actions with oversight by OER. Therefore, the potential for ground disturbance to increase pathways for human exposure to hazardous materials could not be ruled out. While the No-Action Alternative is not anticipated to result in significant adverse impacts to hazardous materials, air quality, or noise, oversight provided through OER by an E-Designation would not exist in the No-Action Alternative. Therefore, the No-Action Alternative would provide less oversight from OER to protect public health compared to the Proposed Actions.

Neighborhood Character

Similar to the Proposed Actions, the No-Action Alternative would not alter the key elements that define the character of the surrounding neighborhood, such as the Bronx River, Starlight Park, and Sheridan Boulevard. However, under the No-Action Alternative, none of the beneficial effects to neighborhood character resulting from the Proposed Actions would occur. In the No-Action Alternative, the projected developments sites would continue to remain as existing conditions, which would not provide views and pedestrian access to the Bronx River waterfront. No additional waterfront open space or retail would be developed in the No-Action Alternative. As a result, the No-Action Alternative would not activate the streetscape or enhance the pedestrian experience compared to existing conditions. Compared to the Proposed Actions, the No-Action

Alternative would generate 970 fewer affordable residential units proximate to existing retail, essential services, and public transit (No. 6 Whitlock Avenue subway station and local buses).

The Proposed Actions would introduce approximately 1.38 acres of new public open space and would introduce uses that would activate both Sheridan Boulevard and the proposed shore public walkway. A new public connection would be provided to Starlight Park along Projected Development Site 1's northern lot line.

Compared to the No-Action Condition, the Proposed Actions would remove existing industrial uses, introduce new public open space, activate the street and waterfront, and better connect the upland portions of the neighborhood to the waterfront. Accordingly, the No-Action Alternative would not result in the improvements to neighborhood character that would occur with the Proposed Actions

Construction

There would be no construction in the No-Action Alternative, and the projected development sites would remain as existing conditions. Therefore, the No-Action Alternative does not have the potential to result in a significant adverse construction impact. However, if new development were to occur, an E-Designation for hazardous materials would not be mapped on the projected development sites, and no oversight would be provided by OER.

The Proposed Actions would result in long-term construction within the Proposed Rezoning Area. Construction-generated traffic would increase during the construction period, along with air and noise emissions from the operation of construction equipment. Detailed modeling indicates that significant adverse construction impacts would not occur in the areas of air quality or noise. With implementation of the E-Designation for the Proposed Actions, the potential for construction on the development sites to increase exposure to hazardous materials would be reduced through OER's oversight.

The Proposed Actions could result in a significant adverse construction impact in the area of traffic. Significant adverse construction traffic impacts could occur during at least one construction peak hour at up to three intersection approaches/lane groups. However, as described in Chapter 20, "Mitigation," all three impacted intersection approaches/lane groups could be mitigated with traffic signal timing modifications.

20.4 No Unmitigated Impact Alternative

The purpose of this alternative is to determine how much the proposed project would need to be reduced in order to avoid unmitigated significant adverse impacts. Based on the analysis presented in other chapters of this FEIS, the Proposed Actions would result in significant adverse impacts in the areas of transportation (traffic and pedestrian) and construction traffic. Potentially significant adverse operational and construction traffic impacts could result from the Proposed Development during one or more peak hours at up to five intersection approaches/lane groups at five study area intersections. The operational traffic and construction traffic impacts could be mitigated with signal timing changes, subject to NYCDOT approval.

In order to determine the feasibility of these proposed traffic signal timing modifications, the Applicant has committed to undertake a TMP, subject to NYCDOT approval. If, based on the TMP, any of the proposed mitigation measures are deemed to be infeasible and no alternative mitigation measures can be identified, then the significant adverse traffic impacts would become unmitigated.

The Proposed Actions would result in unmitigated significant adverse pedestrian transportation impacts. Seven pedestrian elements have the potential to experience a significant adverse impact in at least one or more peak hours. These pedestrian elements include:

Crosswalks

- The north crosswalk (across Sheridan Boulevard) at the intersection of Sheridan Boulevard and Edgewater Road, opposite Jennings Street, during the weekday midday peak hour.
- The south crosswalk (across Sheridan Boulevard) at the intersection of Sheridan Boulevard and Edgewater Road, opposite Jennings Street, during the weekday AM, midday, PM, and Saturday midday peak hours.
- The north crosswalk (across Edgewater Road) at the intersection of Sheridan Boulevard and Edgewater Road, opposite Jennings Street, during the weekday PM and Saturday midday peak hours.
- The south crosswalk (across Edgewater Road) at the intersection of Sheridan Boulevard and Edgewater Road, opposite Jennings Street, during the weekday AM, midday, PM, and Saturday midday peak hours.

Corners

- The northeast corner at the intersection of Longfellow Avenue and Freeman Street during the weekday AM peak hour.

Sidewalks

- The northeast, east-west sidewalk at the intersection of Freeman Street and Hoe Avenue during the weekday AM, PM, and Saturday midday peak hours.
- The northeast, north-south sidewalk at the intersection of Sheridan Boulevard and Edgewater Road, opposite Jennings Street, during the weekday AM and midday peak hours.

The significant adverse impacts at four out of the seven impacted pedestrian elements could be mitigated with readily implementable engineering measures, including the installation of a corner curb extension, crosswalk widening and the relocation of an existing signpost. However, three pedestrian elements that could experience potentially significant adverse impacts would remain unmitigated with the Proposed Actions. These include the south crosswalk of Sheridan Boulevard and Jennings Street, the sidewalk on the north side of Freeman Street, between Hoe and Vyse Avenues, and the south crosswalk of Edgewater Road and Jennings Street. The existing sidewalk width and proximity to up- and downstream traffic signals limit opportunities to mitigate the identified significant adverse impacts.

A sensitivity analysis was completed to determine the amount by which the project would need to be reduced to eliminate the unmitigated pedestrian impacts. The sensitivity analysis found that the Proposed Actions development program would need to be reduced by 55 percent (to 45 percent of the total program) for the pedestrian impacts to be fully mitigated. Reducing the program by 55 percent would result in 437 affordable dwelling units (a reduction of 533 affordable units), 9,553 gsf of retail, and 0.58 acres of publicly-accessible open space. However, the project would still result in significant adverse impacts to the south crosswalks at Sheridan Boulevard and Jennings Street, and Edgewater Road and Jennings Street. Therefore, the following mitigation measures would be proposed:

- Edgewater Road and Jennings Street
  - Widen the south crosswalk by approximately 6 feet, which would result in a total south crosswalk width equal to approximately 20 feet.
  - During the Saturday midday peak hour, shift three seconds from the northbound-southbound Sheridan Boulevard phase to the exclusive pedestrian phase.
- Sheridan Boulevard and Jennings Street
  - This intersection operates under the same signal timing plan as Edgewater Road/Jennings Street. As such, during the Saturday midday peak hour, shift three seconds from the northbound-southbound Sheridan Boulevard phase to the exclusive pedestrian phase.

With these proposed measures in place, the potentially significant impacts to the south crosswalks at the above intersections could be mitigated, and the reduced development program would not result in any unmitigated significant adverse impacts. However, with the program reduction of 55 percent, the project would result in 437 affordable dwelling units (a reduction of 533 affordable units). With the decrease in the amount of affordable housing units and publicly-accessible open space, the reduced project would no longer meet the programmatic goals, purpose and need of the Proposed Actions to maximize the amount of affordable housing that would be produced.