A. INTRODUCTION

As described in the 2014 *City Environmental Quality Review (CEQR) Technical Manual*, alternatives selected for consideration in an environmental impact statement are generally those that are feasible and have the potential to reduce, eliminate, or avoid adverse impacts of a proposed action while meeting some or all of the goals and objectives of this action. The purpose of an analysis of alternatives to a proposed project is to provide the decision makers with the opportunity to consider practicable alternatives that are consistent with the project's purpose, and that could potentially reduce or eliminate significant adverse environmental impacts identified in the Environmental Impact Statement (EIS). As described in Chapter 1, "Project Description," the Proposed Actions would facilitate the redevelopment of an approximately 2.68-acre site in the Greenpoint neighborhood of Brooklyn Community District (CD) 12 with an approximately 654,300 gsf commercial/manufacturing mixed-use development on the Development Site (Brooklyn Block 2615, Lots 1, 6, 19, 21, 25, 50, and 125).

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

- A No-Action Alternative, which is mandated by CEQR and the State Environmental Quality Review Act (SEQRA) and is intended to provide the lead and involved agencies with an assessment of the expected environmental impacts of no action on their part (i.e., no zoning changes or Large Scale General Development (LSGD) special permits).
- A No Unmitigated Significant Adverse Impacts Alternative, which considers a development scenario that would not result in any identified significant, unmitigated adverse impacts.

B. PRINCIPAL CONCLUSIONS

No-Action Alternative

The No-Action Alternative examines future conditions on the Development Site, but assumes the absence of the Proposed Actions (i.e., none of the discretionary approvals proposed as part of the Proposed Actions would be adopted). Under the No-Action Alternative by 2024, existing zoning would remain. It is assumed that in absence of the Proposed Actions, all the existing businesses at the Development Site would relocate, and the vacated buildings would be re-occupied by a mix of eating/drinking/ entertainment establishments, creative office and warehouse uses. It is also assumed that Lot 125, which currently accommodates parking and open storage, would be redeveloped with a new 3-story commercial building with distillery, office, dance studio and restaurant uses, as was planned by the site owner prior to the current proposal. Overall, the No-Action Alternative assumes that the Development Site would accommodate a total of 169,485 gsf, comprised of approximately 35,225 gsf of restaurant/entertainment uses, 66,750 gsf of creative office space, 28,610 gsf of warehousing spaces, and 17,500 gsf of industrial space (distillery), as well as an estimated 21,400 gsf of accessory parking (107 spaces). The technical chapters of this EIS have described the No-Action Alternative as "the Future Without the Proposed Actions."

The significant adverse impacts related to transportation anticipated for the Proposed Actions would not occur under the No-Action Alternative. However, the No-Action Alternative would not meet the goals of the Proposed Actions. The benefits expected to result from the Proposed Actions — including the preservation of an existing industrial use, maintaining the light industrial and manufacturing character of the area while allowing a mix of other complementary uses, encouraging job creation in areas near transit, and addressing a borough-wide need for more commercial office space — would not be realized under this alternative.

No Unmitigated Significant Adverse Impacts Alternative

The No Unmitigated Significant Adverse Impacts Alternative examines a scenario in which the density and other components of the Proposed Development are changed specifically to avoid the unmitigated significant adverse impacts associated with the Proposed Actions. As presented in Chapter 17, "Mitigation," and Chapter 19 "Unavoidable Adverse Impacts," there is the potential for the Proposed Development to result in unmitigated significant adverse impacts related to transportation (traffic). Overall, in order to eliminate all unmitigated significant adverse impacts, the Proposed Development would have to be modified to a point where the principal goals and objectives would not be realized.

C. NO-ACTION ALTERNATIVE

The No-Action Alternative assumes that the Proposed Actions are not implemented. This includes no zoning map changes, and no LSGD special permit. Conditions under this alternative are described in the preceding chapters as the "Future without the Proposed Actions", which are compared in the following sections to conditions under the Proposed Actions. The No-Action Alternative incorporates known development projects in the surrounding area that are likely to be built by the analysis year of 2024.

Under the No-Action Alternative, without a new state-of-the-art purpose-built facility for its operations, Acme Smoked Fish would strongly consider relocating outside of New York State. As such, it is assumed that in absence of the Proposed Actions Acme Smoked Fish would vacate its buildings on the site (Lots 1, 21, 25, and 50). Lot 6, which is currently occupied by ABC Stone, is also expected to be vacated under this alternative, as the business is currently in the process of moving out. Based on existing and anticipated real estate market trends, existing structures and site conditions, and uses allowed by existing zoning, it is expected that those vacated buildings would be re-occupied. As such, the No-Action Alternative assumes that Acme Smoked Fish's and ABC Stone's vacated buildings would be re-occupied by a mix of eating/drinking/entertainment establishments, creative office and warehouse uses. The vacant building on Lot 19, which is the smallest lot on the block, is assumed to be re-occupied by restaurant use in the No-Action. Finally, Lot 125 currently accommodates parking and open storage. Prior to the Proposed Actions being proposed, the current owner of Lot 125 was pursuing a redevelopment of it with a new 3-story commercial building with distillery, office, dance studio and restaurant uses (which would have complied with existing zoning), and filed a building permit application for such a project. Absent the Proposed Actions it is anticipated that the current owner would pursue this project instead.

Overall, the No-Action Alternative assumes that the Development Site would accommodate a total of 169,485 gsf, comprised of approximately 35,225 gsf of restaurant/entertainment uses, 66,750 gsf of creative office space, 28,610 gsf of warehousing spaces, and 17,500 gsf of industrial space (distillery), as well as an estimated 21,400 gsf of accessory parking (107 spaces).

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

Land Use, Zoning, and Public Policy

Under the No-Action Alternative, it is anticipated that existing businesses on the Development Site would vacate the site, and the vacated structures would be re-occupied by uses allowed by the existing M3-1 zoning. It is also assumed that the southernmost lot, which currently accommodates parking and open storage, would be redeveloped with a three-story commercial building. Overall, the No-Action Alternative assumes that the Development Site accommodate a total of 169,485 gsf, comprised of approximately 35,225 gsf of restaurant/entertainment uses, 66,750 gsf of creative office space, 28,610 gsf of warehousing spaces, and 17,500 gsf of industrial space (distillery), as well as an estimated 21,400 gsf of accessory parking (107 spaces).

Unlike the Proposed Actions, the No-Action Alternative would not provide a new state-of-the-art manufacturing facility for Acme Smoked Fish, and would therefore not preserve this long-standing manufacturing use in the neighborhood. While the as-of-right uses would generally be consistent with past development trends in the area, the No-Action Alternative would not introduce new commercial office space to the Development Site and would therefore be less supportive of public policies articulated in New York Works, which aims to bring jobs closer to where New Yorkers live to reduce commuting times and minimize the strain on the transit network. Moreover, unlike the Proposed Actions, the No-Action Alternative would not improve land use conditions in the study area by introducing new publicly accessible open areas to the site.

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

Socioeconomic Conditions

Neither the No-Action Alternative nor the Proposed Actions would be expected to have a significant adverse impact on socioeconomic conditions. Similar to the Proposed Actions, the No-Action Alternative would not result in direct or indirect residential or business displacement. However, Acme Smoked Fish would strongly consider relocating in the absence of the proposed state-of-the-art facility that would be created under the Proposed Actions.

Unlike the Proposed Development, under the No-Action Alternative, the Development Site would introduce a lower density of new commercial uses. While the Proposed Actions would result in an increment of more than 200,000 sf of commercial uses compared to the No-Action Alternative, neither the Proposed Actions nor the No-Action Alternative would result in significant adverse impacts related to socioeconomic conditions.

Open Space

Similar to the Proposed Actions, the No-Action Alternative would not have any direct impacts on any open space resources. Whereas the Proposed Development is anticipated to provide approximately 21,403 sf of partially covered publicly accessible open space areas at the southern end of the Development Site, the No-Action Alternative would not create any new publicly accessible open spaces.

In terms of indirect effects, the No-Action Alternative would introduce less commercial space and substantially fewer workers to the Development Site than the Proposed Development, and would therefore place smaller demands on passive open spaces within the ¼-mile non-residential study area than the Proposed Development. As such, the open space ratios for the ¼-mile non-residential study area under the No-Action Alternative would generally be slightly higher than those under the Proposed Actions. The open space ratios under the No-Action Alternative—like the Proposed Actions—would exceed the *CEQR Technical Manual* open space ratio guidance for both workers and the combined worker/resident population, and therefore daytime and residential users of open space within the ¼-mile non-residential study area would be well-served by the open resources available. Therefore, there would be no significant adverse open space impacts in the study area as a result of either this alternative or the Proposed Actions.

Shadows

Under the No-Action Alternative, all of the existing structures on the site would remain and be reoccupied, and a new 3-story commercial building would be constructed on the southernmost portion of the block comprising the Development Site. With an estimated height of 45 feet, the longest shadow cast by this new structure under the No-Action Alternative would extend approximately 200 feet and, as such, would not be likely to reach any sunlight-sensitive resources. Neither the No-Action Alternative nor the Proposed Actions would result in significant adverse shadow impacts.

Historic and Cultural Resources

As described in Chapter 6, "Historic Resources," the Development Site is not considered to be sensitive for archaeological resources. Therefore, as with the Proposed Actions, the No-Action Alternative would not result in any significant adverse impacts to archaeological resources.

The Development Site does not contain any designated or eligible historic architectural resources, and therefore neither the No-Action Alternative nor the Proposed Development would have any direct physical impacts on any existing architectural resources. The proposed Development Site is not located within 400 feet of any designated/listed architectural resources. The Greenpoint Historic District, which is LPC-designated and S/NR-listed, is located further to the northeast of the Development Site, with a small corner of that historic district intersecting with a 400-foot radius of the Development Site. Like the Proposed Development, the No-Action Alternative would not eliminate or screen publicly accessible views of any historic resources, and neither this alternative nor the Proposed Actions would result in significant adverse indirect or contextual impacts on historic architectural resources.

Urban Design and Visual Resources

Like the Proposed Actions, the No-Action Alternative would not have significant adverse impacts on urban design, view corridors, and visual resources. Under the No-Action Alternative, all of the existing 1- to 2-story buildings on the Development Site would remain, and a new 3-story commercial building would be constructed at the southernmost portion of the site. As such, structures on the Development Site would be shorter under the No-Action Alternative than with the Proposed Actions. However, the urban design benefits associated with the Proposed Actions – including enhancing the pedestrian experience through the improvement of streetscape and sidewalk conditions, creating active, continuous street walls, and providing partially covered open areas programmed with landscaping and seating that would help to enhance the pedestrian experience and provide physical and visual through block connectivity accessible to the public – would not be realized under the No-Action Alternative.

Hazardous Materials

Like the Proposed Actions, the No-Action Alternative would not result in significant adverse hazardous materials impacts. The Proposed Actions would place an (E) designation (E-###) on the Development Site to ensure that construction would not result in significant adverse hazardous materials impacts. Under the No-Action Alternative, the Development Site would be re-occupied/redeveloped on an as-of-right basis in accordance with the applicable DOB guidance in terms of safe building construction and site redevelopment and conversion methods. However, there would be no E-designation requiring OER oversight.

There would be potential for exposure to subsurface contamination under both the No-Action Alternative and the Proposed Actions, however, with the Proposed Actions, the OER oversight and required procedures would ensure that contact is minimized during construction and prevented after site redevelopment, whereas such safeguards would not be in place under the No-Action Alternative,

Water and Sewer Infrastructure

Under this alternative, demands on water and sewer infrastructure would be less than under the Proposed Actions. However, neither the Proposed Actions nor the No-Action Alternative would result in any significant adverse impacts on the City's water supply, wastewater or storm water conveyance and treatment infrastructure.

Transportation

Under the No-Action Alternative, traffic, transit, pedestrian, and parking demand in proximity to the Development Site would increase as a result of background growth, new uses on the Development Site, and other planned developments in the surrounding area unrelated to the Proposed Actions. However, these increases would be greater under the Proposed Actions.

Traffic

Independent of the Proposed Actions, traffic levels of service (LOS) at a number of locations in the study area would experience congested conditions in the future. Under the No-Action Alternative, a total of eight intersections (three signalized and five stop-controlled) are expected to have at least one congested lane group in the analyzed AM and/or PM peak hours, compared to nine analyzed intersection (three signalized and six stop-controlled) with the Proposed Actions. In the absence of the incremental demand that the Proposed Actions would generate, this alternative would not result in the significant adverse traffic impacts identified for the Proposed Actions.

Transit

SUBWAY

Subway Stations

Under the No-Action Alternative demand at the Nassau Avenue (G) subway station is expected to increase as a result of new development and background growth. All analyzed street stairs and fare arrays at this analyzed station would continue to operate at an uncongested LOS A or B in both the AM and PM peak hours under both the No-Action Alternative and the Proposed Actions. Like the No-Action Alternative,

there would be no significant adverse impacts to any analyzed stairways or fare arrays at the Nassau Avenue (G) subway station under the Proposed Actions.

Subway Line Haul

As with the Proposed Actions, peak direction G trains under the No-Action Alternative are expected to be operating below capacity in both the AM and PM peak hours at all analyzed maximum load points with the exception of northbound trains leaving Greenpoint Avenue in the AM peak hour which would be operating at capacity (i.e., a v/c ratio of 1.01). As under the Proposed Actions, peak direction G train service would not be considered significantly adversely impacted under the No-Action Alternative based on *CEQR Technical Manual* criteria.

Pedestrians

Under the No-Action Alternative, pedestrian volumes along analyzed sidewalks, crosswalks, and corner areas are expected to increase compared to existing levels as a result of background growth, new uses on the Development Site, and other planned developments in the surrounding area unrelated to the Proposed Actions.

SIDEWALKS

As with the Proposed Actions, all analyzed sidewalks are expected to operate at an acceptable LOS C or better in all analyzed peak hours under the No-Action Alternative. No significant adverse sidewalk impacts would occur under either the Proposed Actions or the No-Action Alternative.

CROSSWALKS

As with the Proposed Actions, all analyzed crosswalks are expected to operate at an acceptable LOS C or better in all analyzed peak hours under the No-Action Alternative. No significant adverse crosswalk impacts would occur under either the Proposed Actions or the No-Action Alternative.

CORNER AREAS

As with the Proposed Actions, all analyzed corner areas are expected to operate at an uncongested LOS A in all peak hours under the No-Action Alternative. No significant adverse corner area impacts would occur under either the Proposed Actions or the No-Action Alternative.

Parking

Under the No-Action Alternative, it is anticipated that demand for both off-street and on-street parking would increase due to background growth, new uses on the Development Site, and other planned developments in the surrounding area unrelated to the Proposed Actions.

OFF-STREET PARKING

Under the No-Action Alternative, midday off-street public parking demand within the overall parking study area is expected to total 112 percent of capacity, with a deficit of 49 spaces during this period. By comparison, under the Proposed Actions, off-street public parking in proximity to the Development Site would be operating at approximately 124 percent of capacity in the midday period with a shortfall of approximately 103 spaces.

ON-STREET PARKING

Under the No-Action Alternative, on-street parking within ¼-mile of the Development Site is expected to be operating at approximately 101 percent of capacity with a deficit of ten spaces in the weekday midday. By comparison, under the Proposed Actions, on-street parking demand within ¼-mile of the Development Site would operate at approximately 104 percent of capacity, with a deficit of approximately 64 on-street parking spaces in the midday period.

The parking shortfalls under both the No-Action Alternative and the Proposed Actions would not be considered significant adverse impacts under *CEQR Technical Manual* criteria due to the magnitude of available alternative modes of transportation.

Air Quality

Mobile Sources

Under the No-Action Alternative, emissions from traffic demand in the study area would increase as a result of background growth, development that would occur pursuant to existing zoning (i.e., as-of-right-development) on the Development Site, and other development projects likely to occur in the surrounding area. As presented in Chapter 11, "Air Quality," under the No-Action Alternative, no exceedances of the National Ambient Air Quality Standards (NAAQS) for particulate matter less than ten micron in diameter (PM_{10}) would occur due to mobile sources. Therefore, as under the Proposed Actions, significant adverse mobile source impacts are not anticipated under this alternative.

Stationary Sources

Under future conditions without the Proposed Actions, the existing M3-1 zoning would remain and the Proposed Development would not be constructed. The No-Action scenario assumes that vacated buildings would be re-occupied by a mix of eating/drinking/entertainment establishments, creative office and warehouse uses. Lot 125, which currently accommodates parking and open storage, would be redeveloped with a new 3-story commercial building with distillery, office, dance studio and restaurant uses. Overall, in the No-Action condition, emissions in the area from heating and hot water systems, and industrial uses, would be similar to existing conditions. As under the Proposed Actions, significant adverse stationary source impacts are not anticipated under this alternative.

Greenhouse Gas Emissions and Climate Change

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

Noise

Noise levels under the No-Action Alternative would not be expected to be significantly higher than existing levels. As under the Proposed Actions, no significant adverse noise impacts would occur at the noise receptor locations in the study area in the No-Action Alternative. As under conditions in the future with the Proposed Actions, noise levels under the No-Action Alternative would range from the "Marginally Acceptable" CEQR noise exposure category to the "Marginally Unacceptable" CEQR noise exposure

category. However, no significant adverse noise impacts would occur under the No-Action Alternative or Proposed Actions.

Public Health

Neither the Proposed Actions nor the No-Action Alternative would result in significant adverse public health impacts. Similar to the Proposed Actions, the No-Action Alternative would not result in any unmitigated significant adverse impacts in any of the technical areas related to public health. According to the *CEQR Technical Manual*, actions that do not result in unmitigated significant adverse impacts related to air quality, water quality, hazardous materials, or noise typically do not warrant a public health analysis. As the No-Action Alternative does not have the potential to cause any significant adverse impacts in those areas, it would not have any significant adverse impacts on public health.

Neighborhood Character

According to the *CEQR Technical Manual*, a proposed action could have a significant adverse neighborhood character impact if it would have the potential to affect the defining features of the neighborhood, either through the potential for a significant adverse impact in any relevant technical area, or through a combination of moderate effects in those technical areas. The Proposed Actions would not cause significant adverse impacts in the areas of land use, zoning, and public policy; socioeconomic conditions; open space, historic resources, shadows, urban design and visual resources, or noise. The significant adverse transportation impacts would not affect any defining feature of neighborhood character, nor would a combination of moderately adverse effects affect such a defining feature.

New development that would occur on the Development Site under the No-Action Alternative would be moderate, as compared to the Proposed Actions, and the overall neighborhood character of the area would remain substantially the same as it is today under the No- Action Alternative. Under the No-Acton Alternative, Acme Smoked Fish, a long-standing industrial use in the neighborhood, would no longer be in operation at the Development Site. The area surrounding the Development Site would continue to be characterized by a wide variety of industrial/manufacturing, commercial, and residential land uses and various building typologies.

Neither the Proposed Actions nor the No-Action Alternative would result in significant adverse impacts to neighborhood character, however, the improvements to neighborhood character that would occur under the Proposed Actions would not occur under this alternative.

Construction

As the amount of new construction under the No-Action Alternative would be less as compared to the Proposed Actions, the No-Action Alternative would not generate as much temporary construction disruption. The No-Action Alternative would involve construction on only one of the lots comprising the Development Site, and thereby result in less construction-related noise and traffic than the Proposed Actions.

Overall, as the No-Action Alternative would involve substantially less construction, the duration would be shorter and the No-Action Alternative would also result in a shorter duration of construction-related noise and traffic than the Proposed Actions. Neither the Proposed Actions nor the No-Action Alternative would result in significant adverse construction impacts with respect to land use and neighborhood character,

socioeconomic conditions, community facilities, open space, hazardous materials, or air quality. The No-Action Alternative would involve less soil disturbance, but potentially the controls on its performance would not be as stringent as under the Proposed Actions. Neither the Proposed Actions, nor the No-Action Alternative would result in any significant construction-related impacts

D. NO UNMITIGATED SIGNIFICANT ADVERSE IMPACT ALTERNATIVE

According to the *CEQR Technical Manual*, when a project would result in unmitigated significant adverse impacts, it is often CEQR practice to include an assessment of an alternative to the project that would result in no unmitigated impacts. Based on the analyses presented in other chapters of this EIS, there is the potential for the Proposed Actions to result in significant adverse impacts for which no practicable mitigation has been identified with respect to transportation (traffic). This alternative considers measures that would have to be taken to eliminate all of the Proposed Actions' unmitigated significant adverse impacts. As detailed below, in order to result in no unmitigated significant adverse impacts, the Proposed Development would have to be modified to a point where the principal goals and objectives would not be fully realized.

Transportation

As presented in Chapter 17, "Mitigation," the Proposed Actions would result in significant adverse traffic impacts at eight study area intersections during one or both analyzed peak hours; specifically, seven lane groups at six intersections during the weekday AM peak hour and eight lane groups at seven intersections during the weekday PM peak hour. Implementation of traffic engineering improvements such as signal timing changes and the installation of a new traffic signal at the intersection of Franklin Street and Meserole Avenue would fully mitigate the significant adverse impacts to two lane groups at two intersections in the AM peak hour and three lane groups at three intersections during the weekday PM peak hour. Impacts to a total of six lane groups would remain unmitigated at five intersections in one or both analyzed peak hours.

Because of projected congestion at a number of these intersections in the No-Action condition, even a minimal incremental increase in traffic would result in unmitigated impacts. Specifically, seven of the eight impacted intersections would have at least one congested lane group in the AM and/or PM peak hours in the No-Action Condition, and four would have one or more lane groups operating at or over capacity in one or both periods. According to the *CEQR Technical Manual*, for a lane group that would operate at LOS F in the No-Action Condition, a projected increase in delay of three or more seconds is considered a significant impact. As such, small increases in incremental With-Action traffic volumes at some of the congested intersection approach movements would result in significant adverse impacts that could not be fully mitigated during one or both analysis peak hours, and almost any new development on the Development Site could result in unmitigated traffic impacts. As an example, an incremental increase of only seven vehicles per hour at the eastbound stop-controlled approach on Calyer Street at Lorimer Street in the PM peak hour would result in a significant adverse traffic impact under *CEQR Technical Manual* criteria. (No practicable mitigation was identified to mitigate the Proposed Actions' impacts to this approach as warrants for installation of all-way stop control or a new traffic signal could not be satisfied.) As development of the proposed new Acme Smoked Fish facility by itself would generate 17 incremental vehicle trips on eastbound Calyer Street at Lorimer Street in the PM, no reasonable alternative could be developed to completely avoid significant adverse traffic impacts at this location without substantially compromising the Proposed Actions' stated goals.