ENVIRONMENTAL ASSESSMENT AND REVIEW DIVISION

Marisa Lago, *Director*
Department of City Planning

Richmond SI Owner LLC
520 Madison Ave
Suite 3501
New York, NY 10022

Re:	**River North (Liberty Towers)**
CEQR No.	20DCP140R
ULURP No(s).	210289 ZMR, N210290 ZRR, 210291 ZSR
SEQRA Classification:	Unlisted
Staten Island Community District:	SI01

Dear Richmond SI Owner LLC,

Under City Environmental Quality Review, the lead agency is required to determine whether a proposed action may have a significant adverse impact on the environment. In accordance with this regulation, the City Planning Commission has determined that the proposed actions could have significant adverse impacts on the environment.

Enclosed is the Notice of Completion of a Draft Environmental Impact Statement ("NOC"), and Draft Environmental Impact Statement ("DEIS") for CEQR No. 20DCP140R, River North. The NOC and DEIS were issued on May 3, 2021.

Sincerely,

Olga Abinader, *Director*

May 3, 2021
Date

cc: Project File
Marisa Lago, Chair
City Planning Commissioners
Raju Mann, Director, City Council Land Use Division
James Oddo, Staten Island Borough President
Staten Island Community Board SI01

Olga Abinader, *Director,* (212) 720-3493 | oabinad@planning.nyc.gov
Stephanie Shellooe, AICP, *Deputy Director,* (212) 720-3328 | sshellooe@planning.nyc.gov
120 Broadway, 31st Floor, New York, N.Y. 10271 | Fax: (212) 720-3488

DEPARTMENT OF CITY PLANNING
CITY OF NEW YORK

ENVIRONMENTAL ASSESSMENT AND REVIEW DIVISION

Marisa Lago, *Director*
Department of City Planning

May 3, 2021

NOTICE OF COMPLETION OF
THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

River North (Liberty Towers)

Project Identification
CEQR No. 20DCP140R
ULURP Nos. 210289 ZMR, N210290 ZRR, 210291 ZSR
SEQRA Classification: Unlisted

Lead Agency
City Planning Commission
120 Broadway, 31st Floor
New York, New York 10271

Contact Person
Olga Abinader, Director (212) 720-3493
Environmental Assessment and Review Division
New York City Department of City Planning

Pursuant to City Environmental Quality Review, Mayoral Executive Order 91 of 1977, as amended, and the City Environmental Quality Review Rules of Procedure found at Title 62, Chapter 5 of the Rules of the City of New York (CEQR), and the State Environmental Quality Review Act, Article 8 of the New York State Environmental Conservation Law and its implementing regulations found at Part 617 of 6NYCRR (SEQRA), a Draft Environmental Impact Statement (DEIS) has been prepared for the actions described below and is available for public inspection at the office listed at the office of the undersigned as well as online at https://www1.nyc.gov/site/planning/applicants/eis-documents.page. The proposal involves actions by the City Planning Commission (CPC) and the New York City Council pursuant to Uniform Land Use Review Procedure (ULURP). A public hearing on the DEIS will be held at a later date to be announced, in conjunction with the CPC's citywide public hearing pursuant to ULURP. Advance notice will be given of the time and place of the hearing. Written comments on the DEIS are requested and would be received and considered by the Lead Agency until the 10th calendar day following the close of the public hearing.

A. INTRODUCTION

The Applicant, Richmond SI Owner LLC, seeks approval of 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) that would 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.

New development facilitated by the Proposed Actions would serve as a northern gateway to St. George along Richmond Terrace and as an extension of Downtown Staten Island. The Project Area includes two vacant development sites and an underdeveloped site near the St. George Waterfront and the Staten Island Ferry Terminal.

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," comprising Block 13, Lots 82, 92, 100, and the portion of Lot 8 within 185 feet of Stuyvesant Place ["Tentative Lot 95"]) - 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) is projected to be developed as a result of the Proposed Actions.

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 the entirety of Block 12 (Lot 1), and the entirety of Block 13 Lots 60, 68, 71, 73, 82, 92, and 100. Portions of Block 13 Lots 8, 116, and 119 are also within the Project Area.

Much of the Project Area was developed with multiple residential uses from at least the 1890s. In 1961, the existing underlying zoning was mapped in the Project Area (R6 across the Block 13 portion and R6/C1-2 on the Block 12 portion). Residential buildings on Lot 100 were demolished in the 1960s and 1970s, and the lot has remained undeveloped since. The Castleton Park Apartments on Block 13, Lot 8 were constructed in 1976, and significantly modified the existing hillside.

In June 1987, the Special Hillsides Preservation District was mapped across the Block 13 portion of the Project Area, which limited the capacity for new as-of-right development due to special review provisions of the Special Hillsides Preservation District on sites with steep slope. The district provides guidance for development in areas of Staten Island's Serpentine Ridge, and has provisions designed to limit disturbance to natural site features such as steep slope or steep slope buffers, trees, and rock outcroppings.

In 1995, a single-family residence on former Lot 75 (now part of Lot 82) was demolished. In 2006, the last building on Projected Development Site 1 was demolished, and Projected Development Site 1 has since remained vacant.

In 2008, applications for CPC authorizations were filed by Richmond Mountainside Properties, LLC, pursuant to Application Nos. N 080329 ZAR and N 080330 ZAR to permit on Projected Development Site 1: (1) development on a steep slope and a steep slope buffer; (2) modification of the height and setback regulations; and (3) allow certain uses and a parking garage with more than 30 vehicles. The development contemplated by the authorizations included development on two zoning lots – a 208-foot-tall, 139,670 gsf residential building on Lot 100, and a 203-foot-tall, 175,878 gsf residential development on Lots 82 and 92. An environmental assessment statement was prepared for these authorizations, and a conditional negative declaration was issued in June 2008 (CEQR No. 08DCP049R). The conditional negative declaration imposed conditions requiring an archaeological investigation prior to any development and conditions on the height

and location of exhaust stacks and fuel types used in the development. These applications were never advanced or approved, and the site has remained vacant with overgrowth vegetation, except for building foundation remnants on Lot 82.

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. The Special St. George District is mapped across Hamilton Avenue and Richmond Terrace from the Project Area.

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: 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. Independent of the Proposed Actions, the Applicant will acquire Tentative Lot 95 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).

Street widening is mapped along the Stuyvesant Place frontage of Site A and a portion of Block 13, Lot 8 (Castleton Lot) with approximately 50 feet of frontage along Stuyvesant Place. The area mapped for widening includes 185.2 sf of the Tentative Lot 95, 409.7 sf of Lot 100, 314.5 sf of Lot 103, and 750.25 sf of Lot 104.
Projected Development Site 2 is located to the west of Site B and comprises Block 13, Lots 68, 71, and 73. Lot 68 is vacant, and Lots 71 and 73 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 the Richmond Terrace frontage to higher elevations to the west. The entirety of both projected development sites are located in the Special Hillsides Preservation District.

OTHER AFFECTED 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 comprises 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.

B. DESCRIPTION OF THE PROPOSED ACTIONS

The Proposed Project would require the following discretionary actions that are subject to review under the City's ULURP and CEQR process:

1. **Zoning Map Amendments to:**
   - A.) Rezone 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
   - B.) Rezone 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**:
   - A.) ZR 21-15 to allow an R7-3 district to be mapped in the SSGD; and
   - B.) ZR 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:**
   - A.) 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 within the SSGD.
   - B.) ZR Section 128-03 (District Plans and Maps) to include the Project Area within the Upland Subdistrict.
   - C.) ZR Section 128-056 to clarify that the optional Quality Housing Program would be applicable in the R7-3 district within SSGD.
   - D.) 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.
   - E.) 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.
   - F.) ZR Section 128-30 (Height and Setback Regulations) to clarify that R7-3 is subject to regulations under this Section.
   - G.) ZR Section 128-31 (Street Wall Location) to clarify that street wall location requirements are inapplicable in the R7-3 district.
   - H.) ZR Section 128-33 (Maximum Base Height) to establish a maximum street wall height of 75 feet in an R7-3 district.
   - I.) ZR Section 128-34 (Maximum Building Height) to establish a maximum building height of 185 feet or 18 stories within an R7-3 district.
   - J.) 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.
   - K.) 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.

L.) Proposed ZR Section 128-62 (Special Permit for Buildings in R7-3 Districts) 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.**
5. **A CPC Special Permit pursuant to ZR Section 128-62 (Special Permit for Buildings in R7-3 Districts)) modifying the following sections:**
   A.) ZR Section 128-33 (Maximum Base Height) and ZR Section 128-34 (Maximum Building Height) to allow Building 1 and Building 2 to exceed the maximum height limit of 185 feet, and to allow Building 1, 2 and 3 to encroach within the required setback along Stuyvesant Place and Richmond Terrace in order to facilitate the proposed massing and site plan.
   B.) 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.
   C.) 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.
   D.) 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 subject to environmental review pursuant to SEQRA and CEQR guidelines.

The Proposed Actions are classified as an Unlisted action pursuant to SEQRA and are subject to environmental review in accordance with CEQR guidelines.

As lead agency, DCP has overseen the preparation of this EIS in conformance with the 2020 *CEQR Technical Manual* guidelines. The environmental analysis in the EIS assumes that the Proposed Development would be completed in 2025 and identifies the cumulative impacts of other projects in the area affected by the Proposed Actions. The lead agency has conducted a coordinated environmental review of the Proposed Actions including, DCP, the NYC Department of Transportation (NYCDOT), the New York City Department of Parks and Recreation (NYC Parks), the NYC Department of Environmental Protection (DEP), the NYC Landmarks Preservation Commission (LPC), and other interested agencies. Provided below is a statement of the purpose and need for the Proposed Actions, a description of the "Analysis Framework" that served as the basis for analysis of the Proposed Actions, and a summary of the anticipated impacts of the Proposed Actions for each potential impact area required by CEQR.

C. PURPOSE AND NEED FOR THE PROPOSED ACTIONS

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 ability of these sites to be developed with the permissible zoning floor area. As a result, Sites A and B have remained unimproved for many years. At the same time, the natural slope – a significant feature in the Special Hilllsides 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 is atypical within the Special Hillsides Preservation District in that:

- 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;
- The hillside within the Project Area has been compromised by historic and surrounding development, including the parking garage of the Castleton Park Apartments and previous developments that were demolished in the Project Area by the late 1970s, as well as foundations that were constructed and remain on Site B;
- The Project Area is at the very edge of the Special Hillsides Preservation District; and
- 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).

The Proposed Actions are needed to facilitate development that responds to the site's location as a gateway site into Downtown Staten Island and St. George and would accomplish multiple land use goals for the neighborhood and Borough. The Proposed Actions would capitalize on the Project Area's proximity to mass transportation and Downtown Staten Island. Similar to the recent developments along Richmond Terrace and Bay Street such as the Empire Outlets and Lighthouse Point, the Proposed Actions are needed to facilitate development that would provide housing, including affordable options, active retail on Sites A and B along Richmond Terrace, 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 site planning and massing of the projected developments to respond to the surrounding urban context and support a superior site plan and better urban design. Overall, the Proposed Actions would provide additional residential units, including affordable options, in a manner consistent with public policies such as OneNYC 2050, Housing New York 2.0, and North Shore 2030.

D. FRAMEWORK FOR ANALYSIS

Under SEQRA and CEQR, the lead agency is required to take a "hard look" at the environmental impacts of proposed projects, and, to the maximum extent practicable, avoid, minimize, or mitigate potentially significant adverse impacts on the environment, consistent with social, economic, and other essential considerations. An Environmental Impact Statement (EIS) is a comprehensive document used to systematically consider environmental effects, evaluate reasonable alternatives, and identify and mitigate, to the maximum extent practicable, any potentially significant adverse environmental impacts. The EIS provides a means for the lead and involved agencies to consider environmental factors and choose among alternatives in their decision-making processes related to a proposed action. This section outlines the conditions to be examined in the EIS.

Analysis Year

It is anticipated that the Proposed Project would be completed and operational in 2025. Accordingly, a 2025 analysis year is assumed for assessment purposes.

The Future Without the Proposed Actions (No-Action Condition)

In the No-Action Condition, the Site A portion of Projected Development Site 1 would remain vacant because of the provisions of Special Hillsides District that protect steep slope and steep slope buffers make development of this site difficult to develop as-of-right.

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 (the area within 185 feet of Stuyvesant Place). This tentative lot could 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 Future with the Proposed Actions (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 (like the No-Action Condition) and allow Projected Development Site 1 to be one zoning lot. The RWCDS for this project established the Proposed Actions would facilitate development on two projected development sites.

The RWCDS differs from the Proposed Development in that the RWCDS established that Projected Development Site 1 would be developed with 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 is also larger than 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. 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% the area median income (AMI).

<u>Projected Development Site 1</u>

Building 1 would be constructed on Lot 100 and 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 (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 of 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, on Lot 92, 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 Lot 82 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. The Proposed Actions have the potential to facilitate development on Projected Development Site 2 by introducing an additional 3.0 permissible floor area ratio (FAR) and removing the site from the Special Hillsides Preservation District. To present a conservative analysis, the With-Action Condition assumes the existing two two-family residences on Projected Development Site 2 would be demolished and the site would be developed with the maximum permissible FAR of 6.0. The building would be constructed 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 of the AMI.

The increment between the No-Action and With-Action conditions is provided in **Table 1: Project Increment by Use**.

Table Error! No text of specified style in document.**: 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**

E. 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 displacement due to increased rents. The RWCDS established the Proposed Actions would facilitate an increment of 19,834 gsf of commercial space, and further assessment was 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 would apply 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 Public Use Microdata Area (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, according to the *CEQR Technical Manual*, 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 2).

Table 2: 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).

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 to this resource. The St. George Waterfront Esplanade has seating areas near the waterfront with sweeping views across Upper Bay.

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.

Historic 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 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 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, the Proposed Actions would not result in 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 at Projected Development Site 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-volatile 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 and 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 was 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 gpd 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.

<u>Traffic</u>

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;

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

The Proposed Actions would result in a significant adverse air quality impact in the area of mobile sources. 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 the 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. A proposed (E)-Designation 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 was 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 – Roadway

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 PM10 and PM2.5 using the methodology set forth in the *CEQR Technical Manual*. The resulting PM10 and

PM2.5 concentrations would exceed the NAAQS or *de minimis* thresholds absent mitigation. 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 increase traffic flows through this intersection, and the resulting air quality conditions would be fully mitigated.

Mobile Sources – Parking Garages

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, PM10, and PM2.5 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 resulting 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 Proposed Actions would generate approximately 3,802 total metric tons carbon dioxide equivalent (CO2e) of annual emissions from building operations, and 10,479 metric tons of CO2e emissions from mobile sources annually, for an annual total of approximately 14,281 metric tons of CO2e 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.

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 CO2e 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.

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 coordinate 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 HVAC systems, 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

Based on a preliminary assessment, 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

The Proposed Actions would result in a significant adverse construction impact in the area of transportation and noise. 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.

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

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, an (E) Designation would be placed on the projected development sites for hazardous materials. The (E) Designations would require approval by OER prior to obtaining DOB permits for 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.

Mitigation measures such as signal timing changes would mitigate or partially mitigate several of the significant adverse traffic impacts. Implementation of the proposed mitigation measures is subject to review and approval by NYCDOT. If these measures are deemed infeasible and no alternative mitigation measures can be identified, then the identified significant adverse traffic impacts would be unmitigated.

Transit

The Project Area is well-served by 22 NYCT/MTA bus lines, as well as the 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 resulting from the Proposed Actions would generate a maximum parking demand of approximately 260 spaces during the weekday midday period. The operational parking analysis conducted for the Proposed Actions indicates that in the No-Action Condition, off-site public parking facilities within ¼-mile of the Project Area 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 non-road 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; and
- 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 NO2, one-hour and eight-hour CO, and 24-hour and annual PM2.5 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.

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 regard to increasing housing supply in the area and the provision of affordable units. Further, the No-Action Alternative has the potential to result in greater 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, transportation, and construction: transportation and construction: noise 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.

Mitigation measures such as signal timing changes would mitigate or partially mitigate several of the significant adverse traffic impacts. Implementation of the proposed mitigation measures is subject to review and approval by NYCDOT. If these measures are deemed infeasible and no alternative mitigation measures can be identified, then the identified significant adverse traffic impacts would be unmitigated.

Mitigation Measures

Open Space

In the With-Action Condition, the active open space ratio within the Study Area would decrease by 12.1 percent (0.04 points, from 0.37 to 0.33 acres per 1,000 residents), and would be below the *CEQR Technical Manual* open space ratio guideline of 2.00 acres of active open space per 1,000 residents. Accordingly, the Proposed Actions would result in a significant adverse indirect open space impact to the Study Area's active open space.

To avoid the significant adverse open space impact, the acreage of active open space created in the With-Action Condition would need to increase by approximately 0.40 acres (8 percent of the Study Area's No-Action active open space acreage). Alternatively, the number of dwelling units

that could be developed on the projected development sites would have to be reduced to 444 dwelling units, which would represent an approximately 50 percent decrease (453 fewer dwelling units) from the With-Action Condition of 897 dwelling units.

Potential mitigation measures for the identified significant adverse open space impact are currently being explored by the Applicant in consultation with DCP – the Lead Agency – and NYC Parks. The potential mitigation measures will be refined between the DEIS and the FEIS, and will reflect the nature and scope of the open space impacts, taking into account the quantitative and qualitative open space assessments.

Transportation

In the With-Action Condition, the Proposed Actions would result in a significant adverse traffic impact. No 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 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 3).

Table 3: 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 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 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.

Construction

Traffic

Project-generated construction would result in 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 4).

Table 4: 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 seven (7) impacted intersection approaches/lane groups (combined for 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.

Unavoidable Adverse Impacts

The Proposed Actions would result in significant adverse impacts to open space, transportation, and construction: transportation and construction: noise. Mitigation is being considered to the extent practicable for these identified significant adverse impacts. However, in some instances, no practicable mitigation may 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.

F. 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.

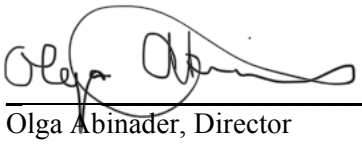
G. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

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 private open areas between Buildings 1, 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.*



Olga Abinader, Director
Environmental Assessment and Review Division
New York City Department of City Planning

CC:

Marisa Lago, Chair
City Planning Commissioners
James Oddo, Staten Island Borough President
Nicholas Siclari, Chair, Community Board 1, Staten Island
Joseph Carroll, District Manager, Community Board 1, Staten Island
Raju Mann, City Council
Hilary Semel, OEC
Terrell Estesen, DEP
Colleen Alderson, DPR
Naim Rasheed, DOT
Gina Santucci, LPC
Amanda Sutphin, LPC
Lisa Schreibman, MTA
Krishna Omalade, IDA

Anita Laremont
Joseph Helferty
Christopher Hadwin
Aleena Farishta
Steven Lenard
Ken Ramnarine
Yun Li
Frank Ruchala
Dominick Answini
Susan Amron
Howard Slatkin
Stephanie Shellooe
Mauricio Garcia
Evan Lemonides
Susan Wong