A. INTRODUCTION

As described in the 2021 *City Environmental Quality Review* (CEQR) *Technical Manual*, alternatives selected for consideration in an environmental impact statement are generally those that are feasible and have the potential to reduce, eliminate, or avoid significant adverse impacts of a proposed project while meeting some or all of the goals and objectives of this project. The purpose of an analysis of alternatives to a proposed project is to provide the decision makers with the opportunity to consider practicable alternatives that are consistent with the project's purpose, and that could potentially reduce or eliminate significant adverse environmental impacts identified in the Environmental Impact Statement (EIS). As described in **Chapter 1, "Project Description,"** the Proposed Action would facilitate a proposal by the Applicant to develop a new approximately 238,104 gross square foot (gsf) mixed-use development ("Proposed Project") on approximately 37,928 sf of lot area ("Projected Development Site 1"). The Proposed Project would consist of a single-story building and a nine-story building separated by a pedestrian alleyway. The single-story structure and first two floors and cellar floor of the nine-story building would contain a combined total of approximately 75,586 gsf of retail uses; the second and third floors of the proposed nine-story building would contain approximately 40,732 gsf of light industrial uses; and the remaining floors (three through nine) of the proposed nine-story building would contain approximately 121,786 gsf of commercial office uses. The proposed zoning map amendment would rezone Projected Development Site 1 (Block 3167, Lots 18 and 24) and several additional sites not under the control of the Applicant (Block 3167, Lots 12 (p/o), 26, 29, and 40). Together, these lots comprise approximately 79,833 sf (the "Project Area").

Under the reasonable worst-case development scenario (RWCDS), Projected Development Site 1 would be developed with an approximately 298,534 gsf development containing approximately 75,586 gsf of retail space, 40,732 gsf of light industrial space, 121,786 gsf of commercial office space, and 59,973 gsf of community facility (medical office) space.[1] The Proposed Project would also contain up to 0.11 acres of private open space areas that would serve as a pedestrian alleyway and 0.33 acres of private outdoor office amenity space located at the Proposed Project's second- and fourth-floor terraces. In addition, under the Proposed Action it is assumed that Lot 29 ("Projected Development Site 2") and Lot 40 ("Projected Development Site 3") would each be redeveloped in the 2027 With-Action scenario. It is anticipated that Projected Development Site 2 would be redeveloped with a six-story, predominantly commercial office building with ground-floor retail uses comprising approximately 79,821 gsf of office space and 16,730 gsf of retail space, and Projected Development Site 3 would be redeveloped with a five-story, predominantly commercial office building with ground-floor retail uses comprising approximately 32,547 gsf of office space and 6,250 gsf of retail space.

This chapter considers two alternatives to the Proposed Project: (1) a No-Action Alternative, which contemplates a new as-of-right development is anticipated to be developed pursuant to existing M1-1

[1] As described in **Chapter 1, "Project Description,"** while the Applicant intends to redevelop Projected Development Site 1 with a mixed-use building pursuant to the maximum commercial FAR of 5.0 (the "Proposed Project"), the proposed M1-5 zoning district permits a maximum community facility FAR of 6.5. Therefore, for conservative analysis purposes, the RWCDS for Projected Development Site 1 maximizes the permitted FAR with an additional 1.5 FAR of community facility (medical office) uses over the Proposed Project (5.0 FAR).

zoning at the Projected Development Sites; and (2) a No Unmitigated Significant Adverse Impacts Alternative, which considers a development scenario that would not result in any identified significant unmitigated adverse impacts.

B. PRINCIPAL CONCLUSIONS

No-Action Alternative

The No-Action Alternative examines future conditions on Projected Development Sites 1 and 2, but assumes the absence of the Proposed Action (i.e., none of the discretionary approvals proposed as part of the Proposed Actions would be adopted). Under the No-Action Alternative by 2027, it is anticipated the currently vacant, approximately 30,388 gsf former industrial building on Lots 18 and 24 would be converted and reoccupied with commercial retail uses pursuant to the existing M1-1 zoning. No other changes to the remaining Project Area lots are anticipated in the No-Action Alternative. The technical chapters of this EIS have described the No-Action Alternative as "the Future Without the Proposed Action."

The significant adverse impacts related to transportation anticipated for the Proposed Action would not occur under the No-Action Alternative. However, the No-Action Alternative would not meet the goals of the Proposed Project. The benefits expected to result from the Proposed Project as intended by the Applicant – including the creation of new, Class A office space targeting technology, advertising, media, and information ("TAMI") firms within a transit-rich area, promoting livable and walkable mixed-use neighborhoods with work spaces within close proximity to nearby residential communities – would not be realized under this alternative, and the No-Action Alternative would fall short of the objectives of the Proposed Action.

No Unmitigated Significant Adverse Impacts Alternative

The No Unmitigated Significant Adverse Impacts Alternative examines a scenario in which the density and other components of the Proposed Project are changed specifically to avoid the unmitigated significant adverse impacts associated with the Proposed Project. As presented in **Chapter 9, "Mitigation,"** and **Chapter 11, "Unavoidable Adverse Impacts,"** there is the potential for the Proposed Action to result in unmitigated significant adverse impacts related to transportation. Overall, in order to eliminate all unmitigated significant adverse impacts, the RWCDS would have to be modified to a point where the principal goals and objectives would not be realized.

C. NO-ACTION ALTERNATIVE

The No-Action Alternative examines future conditions on the Project Area, but assumes the absence of the Proposed Action (i.e., none of the discretionary approvals proposed as part of the Proposed Actions would be adopted). Conditions under this alternative are similar to the "Future without the Proposed Action" described in the preceding chapters, which are compared in the following sections to conditions under the Proposed Action. The No-Action Alternative incorporates known development projects in the surrounding area that are likely to be built by the analysis year of 2027.

Under the No-Action Alternative, it is assumed that while no new construction would be planned for the Applicant-owned Projected Development Site 1, the currently vacant, approximately 30,388 sf former

industrial building on Lots 18 and 24 would be converted and reoccupied with commercial retail uses in the No-Action condition. As a result, Projected Development Site 1 would be occupied by approximately 31,907 gsf of commercial retail uses pursuant to the existing M1-1 zoning. As described in **Chapter 2, "Land Use, Zoning, and Public Policy,"** M1-1 zoning district permit 1.0 FAR for commercial and manufacturing uses. No other changes to the remaining Project Area lots are anticipated in the future without the Proposed Action.

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

Land Use, Zoning, and Public Policy

As described above, under the No-Action Alternative, it is anticipated that existing former industrial building at Projected Development Site 1 would be converted and reoccupied with approximately 31,907 gsf of commercial retail uses and Projected Development Sites 2 and 3 would remain as under existing conditions: a single-story commercial building containing approximately 20,475 gsf of retail space and a single-story warehouse building containing approximately 7,613 gsf of light industrial space, respectively. Compared to existing conditions, the No-Action Alternative would introduce new commercial retail uses to the Project Area at Projected Development Site 1. While, the No-Action Alternative would result in a change of land use on the Project Area, such land uses are permitted as-of-right under the existing M1-1 zoning district.

No changes to zoning or public policy are anticipated to the Project Area under the No-Action Alternative. Under this alternative, the existing M1-1 zoning classification of the Project Area would remain and no zoning special permits or other land use actions would be required.

It is the Applicant's opinion that unlike the Proposed Action, the No-Action Alternative would not improve land use conditions in the study area by providing increased walk-to-work opportunities within Brooklyn Community District 4, contributing to an increase in density of appropriate land uses in an area well-served by existing infrastructure and public transportation, strengthening the economic base of the Bushwick neighborhood, enhancing the value of land and buildings, contribute to a diverse mix of business uses and employment in the neighborhood, and protect the City's tax revenue. In addition, the Applicant believes that under the No-Action Alternative, the pedestrian experience would not be as enhanced with active retail or publicly accessible areas as compared to the Proposed Action. Further, the Applicant believes that the No-Action Alternative would be less supportive of public policies articulated in the City's New York Works policy, which aims to bring jobs closer to where New Yorkers live in order to reduce commuting times and minimize the strain on the transit network, and *OneNYC (formerly PlaNYC),* whose goals include encouraging an environment in which small businesses can succeed, focusing development in areas that are server by mass transit, and fostering walkable retail destinations.

While the Applicant believes that the No-Action Alternative does not achieve the beneficial land use changes that would result under the Proposed Action, neither the Proposed Action nor the No-Action Alternative would result in significant adverse impacts related to land use, zoning, and public policy, as described in **Chapter 2, "Land Use, Zoning, and Public Policy."**

Open Space

It is anticipated that existing former industrial building at Projected Development Site 1 would be converted and reoccupied with approximately 31,907 gsf of commercial retail uses and Projected

Development Sites 2 and 3 would remain as under existing conditions: a single-story commercial building containing approximately 20,475 gsf of retail space and a single-story warehouse building containing approximately 7,613 gsf of light industrial space, respectively. The No-Action development would re-introduce previous land uses to the Project Area. As such, the No-Action Alternative would not result in a change of land use on the Project Area. Compared to existing conditions, approximately 106 additional workers would be introduced to the area as a result of the as-of-right conversion on Projected Development Site 1. An additional 143 workers would also be introduced to the area as a result of the No-Build sites anticipated for development by 2027 absent the Proposed Action (see **Table 2-3** in **Chapter 2, "Land Use, Zoning, and Public Policy"**). As such, a total of 249 additional workers would be introduced into the area under the No-Action Alternative. Unlike the Proposed Action, the No-Action Alternative would not result in the creation of the 0.11-acre, at-grade private open space that would serve as a pedestrian alley at Projected Development Site 1. Similar to existing conditions, the passive open space ratio under the No-Action Alternative would remain above the City's planning guideline ratio of 0.15 acres per 1,000 persons. As such, under the No-Action Alternative, no significant adverse active open space impacts would occur. However, the open space benefits associated with the Proposed Action would not occur under the No-Action Alternative.

Transportation

As discussed below, unlike the Proposed Actions, the No-Action Alternative would not result in any significant adverse impacts with respect to transportation. Unlike the Proposed Actions, the No-Action Alternative would not result in the potential for significant adverse traffic impacts to six, five, seven, and three intersections in the weekday AM, midday, and PM, and Saturday peak hours, respectively. Additionally, the Proposed Actions' significant adverse impacts to one crosswalk in one or more peak hour would not occur under the No-Action Alternative. In the No-Action Alternative, traffic, parking, transit, and pedestrian demand in the study area would increase as a result of background growth, development that could occur pursuant to existing zoning (i. e., as-of-right development), and other development projects likely to occur within and in the vicinity of the Project Area.

Traffic

Independent of the Proposed Actions, traffic levels of service (LOS) at many locations in the study area would experience congested conditions in the future. Under the No-Action Alternative, a total of eight intersections (six signalized and two unsignalized) would have at least one congested lane group in one or more peak hours, same as under the Proposed Actions. However, there would be no intersections with significant adverse traffic impacts under the No-Action Alternative compared with six, five, seven, and three impacted intersections under the Proposed Actions during the weekday AM, midday and PM, and Saturday peak hours, respectively.

Transit

Subway Station

Under the No-Action Alternative, the Jefferson Street (L) subway station would experience an increase in demand as a result of background growth and future developments anticipated within and in the vicinity of the Project Area. No pedestrian elements (stairs and fare arrays) at this station would experience significant adverse impacts under this alternative, as under the Proposed Action. Under the No-Action Alternative, all street stairs and fare arrays would operate at an uncongested LOS A in both AM and PM peak hours. By comparison, under the Proposed Action, all analyzed street stairs and fare arrays would

operate at an acceptable LOS B or better in both the AM and PM peak hours. As such, both the No-Action Alternative and Proposed Action would not result in significant adverse subway station impacts.

Pedestrians

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

Sidewalks

Under the No-Action Alternative, all analyzed sidewalks are expected to operate at an uncongested LOS B in all peak hours. By comparison, under the Proposed Action, all analyzed sidewalks would operate at an acceptable LOS C or better in all analyzed peak hours. As under the Proposed Action, the No-Action Alternative would not result in any significant adverse sidewalk impacts.

Crosswalks

Under the No-Action Alternative, all analyzed crosswalks are expected to operate at an acceptable LOS C or better in all peak hours. The Proposed Action's significant adverse impact at the south crosswalk at the intersection of Flushing Avenue and Irving during the weekday PM and Saturday peak hours would not occur under this alternative.

Corners

Under the No-Action Alternative all analyzed corner areas are expected to operate at an uncongested LOS A in all peak hours. By comparison, under the Proposed Action, all analyzed corners would operate at an uncongested LOS B or better in all analyzed peak hours. As under the Proposed Action, the No-Action Alternative would not result in any significant adverse corner area impacts.

Parking

Under the No-Action Alternative, it is expected that parking demand in the vicinity of the Project Area would increase as a result of background growth and new development. However, the parking demand generated by the No-Action Alternative would be substantially less than for the proposed developments', and off-street parking requirements for new developments would provide sufficient capacity to accommodate the additional parking demand anticipated under the No-Action Alternative. Under the No-Action Alternative, on-street and off-street parking within the ½-mile study area is expected to operate at approximately 93 and 98 percent of capacity, with a surplus of 279 and 3 spaces in the weekday midday peak period, respectively. By comparison, under the Proposed Action, on-street and off-street parking demand within the same study area is expected to operate at approximately 101 and 309 percent of capacity, with a shortfall of 28 and 314 spaces during the same period, respectively. As such, the No-Action Alternative would not result in significant adverse parking impacts.

Air Quality

While some development would occur under the No-Action Alternative, the Proposed Action would result in more development and therefore the emissions from heat and hot water systems associated with the Proposed Action would cumulatively be greater than the emissions from heat and hot water systems in

the No-Action Alternative. However, unlike the Proposed Action, the as-of-right development on the Projected Development Sites would not have an environmental assessment of air quality exposure as conducted for the Proposed Action; thus, such development would not be subject to any air quality E designations. Specifically, they would not have the restrictions specified in **Chapter 5, "Air Quality,"** for the control of emissions for fossil-fuel-fired heating, ventilation, and air conditioning (HVAC) systems, which would be designed to ensure that there would be no significant adverse air quality impacts at nearby receptor locations.

Additionally, mobile source emissions from traffic on surrounding roadways would increase as a result of general background traffic growth and new development in the surrounding area, when compared to existing conditions. As presented in **Chapter 5,** no exceedances of the National Ambient Air Quality Standards (NAAQS) would occur and the Proposed Development's combustion systems would not cause any significant adverse air quality impacts under the Proposed Action. As the No-Action Alternative would result in less mobile source emissions (i.e., less incremental vehicle trips) than the Proposed Action, significant adverse impacts are unlikely under the No-Action Alternative.

Noise

In the No-Action Alternative, traffic volumes would increase in the area due to general background growth and trips associated with new development that would be independent of the Proposed Action. However, compared to existing conditions, the increases in L_{eq} noise levels at the three analyzed receptor locations under the No-Action Alternative would be minimal. As outlined in **Chapter 6, "Noise,"** the increases in L_{eq} noise levels would not exceed 3.0 dBA at any of the receptor locations. Specifically, under the No-Action Alternative, the increases in L_{eq} noise levels would range from 0.19 dBA to 0.59 dBA at the three receptor locations during all analysis peak periods over existing conditions. According to *CEQR Technical Manual* guidelines, increases of less than 3.0 dBA would be barely perceptible, and therefore, no significant adverse noise impacts are expected under the No-Action Alternative.

Additionally, under the No-Action Alternative, the maximum projected noise levels at Receptor Locations 1, 2, and 3 would be 72.71 dBA, 73.77 dBA, and 63.74 dBA, respectively. As such, Receptor Location 1 would fall in the "Marginally Unacceptable (I)" CEQR Noise Exposure category, Receptor Location 2 would fall in the "Marginally Unacceptable (II)" CEQR Noise Exposure category, and Receptor Location 3 would fall in the "Acceptable" CEQR Noise Exposure category. By comparison, under the Proposed Action, each of the receptor locations would remain in the same CEQR Noise Exposure category. However, unlike the Proposed Action, the as-of-right development on the Projected Development Sites would not have an environmental assessment of noise as conducted for the Proposed Action; thus, such development would not be subject to any E designations related to noise. Specifically, they would not have the noise attenuation requirements specified in **Chapter 6, "Noise,"** which would be designed to ensure that there would be no significant adverse noise impacts related to building attenuation at the projected development sites.

Public Health

Similar to the Proposed Actions, the No-Action Alternative would not result in any unmitigated significant adverse impacts in any of the technical areas related to public health. According to the *CEQR Technical Manual*, actions that do not result in unmitigated significant adverse impacts related to air quality, water quality, hazardous materials, or noise typically do not warrant a public health analysis. As the No-Action Alternative does not have the potential to cause any significant adverse impacts in those areas, it would

not have any significant adverse impacts on public health.

Neighborhood Character

According to the *CEQR Technical Manual*, a proposed project could have a significant adverse neighborhood character impact if it would have the potential to affect the defining features of the neighborhood, either through the potential for a significant adverse impact in any relevant technical area, or through a combination of moderate effects in those technical areas. Similar to Proposed Action, the No-Action Alternative would not cause significant adverse impacts in the areas of land use, zoning, and public policy; socioeconomic conditions; open space; shadows; urban design and visual resources; or noise. Further, no significant adverse transportation impacts are anticipated as a consequence of the No-Action Alternative. As such, the No-Action Alternative would not affect any defining feature of neighborhood character, nor would a combination of moderately adverse effects affect such a defining feature. New as-of-right retail development would occur under the No-Action Alternative. The study area would continue to be characterized by its evolving mix of land uses and building types, and its location in an area with low pedestrian volumes. Neither the Proposed Action nor the No-Action Alternative would result in significant adverse impacts to neighborhood character.

D. NO UNMITIGATED SIGNIFICANT ADVERSE IMPACTS ALTERNATIVE

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

Transportation

Traffic

As presented in **Chapter 9, "Mitigation,"** the Proposed Action would result in significant adverse traffic impacts at eight study area intersections during one or more analyzed peak hours; specifically, six intersections during the weekday AM peak hour, five intersections during the weekday midday peak hour, seven intersections during the weekday PM peak hour, and three intersections during the Saturday peak hour. Implementation of traffic engineering improvements, such as signal timing changes, would provide mitigation for some of the anticipated traffic impacts. Specifically, the significant adverse impacts would be fully mitigated at two lane groups in the weekday AM peak hour, one lane group in the midday peak hour, two lane groups in the weekday PM peak hour, and one lane group in the Saturday peak hour. Impacts would be fully mitigated at one intersection during each of the weekday AM, PM, and Saturday peak hours. During the weekday midday peak hour, none of the impacted intersections would be fully mitigated. In total, impacts to one or more lane groups would remain unmitigated in one or more peak hours at seven intersections.

Because of existing congestion at a number of these intersections, even a minimal increase in traffic would result in unmitigated impacts. Specifically, in the No-Action condition, a total of eight intersections would

have at least one congested lane group in one or more peak hours, and a total of four, five, seven, and five intersections would have one or more lane groups operating at or over capacity in the weekday AM, midday, and PM, and Saturday peak hours, respectively. According to the *CEQR Technical Manual*, for a lane group that would operate at LOS F in the No-Action condition, a projected delay of three or more seconds is considered a significant impact. As such, small increases in incremental With-Action traffic volumes at some of the congested intersection approach movements would result in significant adverse impacts that could not be fully mitigated during one or more analysis peak hours, and almost any new development in the Project Area could result in unmitigated traffic impacts. Therefore, no reasonable alternative could be developed to completely avoid such impacts without substantially compromising the Proposed Action's stated goals.