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Alternatives

As described in the *2021 City Environmental Quality Review* (*CEQR) Technical Manual*, alternatives selected for consideration in an environmental impact statement are generally those which are feasible and have the potential to reduce, eliminate, or avoid adverse impacts of a proposed action while meeting some or all of the goals and objectives of that action.

Introduction

As detailed in **Chapter 1, Project Description**, the Proposed Actions would facilitate the development of approximately 1,215,000 gross square feet (gsf) including approximately 1,106,500 gsf of residential space with up to 1,150 dwelling units (DUs) (approximately 300 of which would be affordable pursuant to MIH Option 1 as intended by the Project Developer), community facility space, including a 35,000-gsf museum, 36,500 gsf of local retail space,[1] approximately 140 below-grade parking spaces, and approximately 50,000 square feet (sf) of open space, 43,000 sf of which would be publicly accessible including 34,000 sf of required Waterfront Public Access Area (WPAA), and 9,000 sf of Public Access Area (PAA), collectively, the Proposed Development. The remaining 7,000 sf of open space would be made up of space for museum visitors, as well as landscaping and planting areas intended to visually blend and physically connect with the WPAA and PAA spaces. The Proposed Development would include a newly created turnaround on Quay Street, at its terminus, adjacent to Wharf Drive. The portions of the turnaround area that extend beyond the mapped street would be considered PAA with an area of approximately 2,000 sf.

The Proposed Development would include three buildings: the 35,000-gsf Monitor Museum on Lot 25 and two mixed use buildings on Lot 1 which would be comprised of the West Building, an

[1] The Project Developer may include up to approximately 3,000 sf of community facility space (i.e., meeting space) for non-profit use in place of local retail space in the East Building. For the purpose of a conservative assessment, the EIS analyzes this space as local retail.

approximate 979,000-gsf mixed-use residential and commercial building reaching a height up to 640 feet (including bulkhead) and the East Building, an approximate 201,000-gsf mixed-use residential and commercial building with a height up to 260 feet (including bulkhead).

To enable the redevelopment of the Development Site, the Proposed Actions would facilitate the relocation and consolidation of two existing NYCTA facilities into a new approximate 143,000-gsf turnkey facility (the NYCTA Replacement Facility) at 213 Meadow Street in East Williamsburg (the NYCTA Relocation Site). The NYCTA Replacement Facility would house the NYCTA Mobile Wash Unit and Materials Storage, currently located on Lot 1 of the Development Site (the NYCTA Facility), as well as the NYCTA Emergency Response Unit facility, presently located at 65 Commercial Street (Block 2472, Lot 415) (the ERU Facility) in northern Greenpoint. The relocation of the ERU Facility to the NYCTA Relocation Site would create a fully vacant site at Commercial Street, which would facilitate the full realization of the City's planned Box Street Park by allowing for an additional 25,000 sf of publicly accessible open space at the ERU Site in the future.

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

- A **No-Action Alternative**, which is mandated by CEQR and the State Environmental Quality Review Act (SEQRA). The No-Action Alternative is intended to provide the lead and involved agencies with an assessment of the expected environmental conditions in 2031 (the build year for the Proposed Actions) in the absence of the Proposed Actions.
- An **Existing Zoning Alternative**, which considers development on the Development Site pursuant to the existing R6 and R6/C2-4 zoning district.
- A **No Unmitigated Significant Adverse Impacts Alternative**, which considers a development scenario that would not result in any identified unmitigated significant adverse impacts.

Principal Conclusions

No-Action Alternative

The No-Action Alternative examines the future without the Proposed Actions (the No-Action condition). Under the No Action Alternative, the relocation of the existing NYCTA Facility and ERU Site would not occur and existing conditions would remain on the Development Site. Under the No-Action Alternative, the goals and objectives of the Proposed Actions would not be met. The No-Action Alternative would not provide for any new housing, including much-needed affordable housing, nor would it provide any public realm benefits, including the addition of approximately 50,000 sf of new open space (including a 34,000-sf WPAA and 9,000 sf of PAA), long-term funding to the City/NYC Parks for the operation of Bushwick Inlet Park, development of the Greenpoint Monitor Museum to celebrate maritime history, the generation of long-term revenue for NYCTA infrastructure improvements, shoreline stabilization measures to prevent further erosion of the shoreline revetment and adjacent upland areas and resiliency improvements, or the relocation of the existing NYCTA Facility and ERU Facility to a new turnkey NYCTA Replacement Facility. Rather, in the No Action Alternative, the existing NYCTA Facility would remain at its current location, preventing the planned connection of Bushwick Inlet Park, and forming a dead end at the site of the undeveloped shoreline of Lot 25 and the back of the existing NYCTA Facility thereby limiting the connectivity of the waterfront to points north. The ERU Facility would also remain at its current location preventing the City from realizing an additional 25,000 sf of open space at its planned Box Street Park.

Existing Zoning Alternative

In the Existing Zoning Alternative, the Applicants would seek MTA Board Approval (a discretionary action subject to SEQRA) to relocate the existing NYCTA Facility on Lot 1, facilitating a new development on the Development Site pursuant to the existing R6 and R6/C2-4 zoning district. This alternative would facilitate the development of two buildings: an up to 15-story West Building and a 3-story East Building. The development would include approximately 280 market rate DUs and approximately 10,000 gsf of retail space. The Existing Zoning Alternative could result in significant adverse impacts similar to those of the Proposed Actions; however, it would provide for significantly less housing and no affordable housing. Further, many of the intended public benefits of the Proposed Actions would not be realized with the Existing Zoning Alternative. This alternative would provide only some of the public realm benefits that would occur as part of the Proposed Development, including the addition of an upland connection that would be 60 feet wide and run the depth of the site and construction of a new turnkey facility for the NYCTA. However, this alternative would not provide a new museum or long-term funding to the City/NYC Parks for the operation of Bushwick Inlet Park. Unlike the Proposed Development, the implementation of shoreline stabilization measures along Lot 25 to prevent further erosion of the shoreline would not occur, and resiliency improvements would not be undertaken. Further, unlike the Proposed Development, the Existing Zoning Alternative would not facilitate a connection between Bushwick Inlet Park and the Shore Public Walkway to the north of the Development Site. Instead, Bushwick Inlet Park would reach a dead end at Lot 25 with an upland connection to West Street.

No Unmitigated Significant Adverse Impacts Alternative

As discussed in **Chapters 19, Mitigation**, and **21, Unavoidable Significant Adverse Impacts**, the Proposed Actions would have the potential to result in unmitigated significant adverse construction noise impacts and transportation impacts - specifically impacts to traffic and pedestrians during both future operational conditions and peak construction. The No Unmitigated Significant Adverse Impacts Alternative examines a scenario in which the projected density increase and other components of the Proposed Actions are changed specifically to avoid the potential for any unmitigated significant adverse impacts associated with the Proposed Actions.

A sensitivity analysis was conducted at key intersections within the study area to determine the minimum level of travel demand that would result in any unmitigable transportation-related significant adverse impact under operational and construction conditions.

This analysis determined that under operational conditions, the addition of just three inbound project-generated vehicles (two to the northbound left-turn movement plus one to the southbound right-turn movement) at the intersection of Franklin Street and Quay Street during the weekday PM peak hour would result in a traffic impact that could not be mitigated. Significant reductions in the program of the Proposed Development would be required to avoid the unmitigable significant adverse impact identified above. The Proposed Development would need to be reduced to just 45 residential DUs, representing approximately 4 percent of the 1,150 total DUs proposed, or to 1,400 gsf of local retail space, representing approximately 4 percent of the 36,500 gsf of local retail space being proposed. Therefore, to avoid any unmitigable transportation-related impact, the Proposed Development's program would have to be substantially reduced below the thresholds described above or the Development Site would have to remain in its existing condition. Without the density introduced by the Proposed Actions, it would not be feasible to deliver the intended community

benefits, including the development of affordable housing and 50,000 sf of proposed new open space, the development of the Monitor Museum, and associated shoreline restoration and resiliency measures, or any long-term investment in Bushwick Inlet Park or NYCTA infrastructure.

For construction transportation, a sensitivity analysis was conducted for the intersection of McGuinness Boulevard and Greenpoint Avenue, where an unmitigable impact would occur during the weekday PM construction peak hour. This analysis determined that the volume of construction worker vehicles traveling in the eastbound through direction would have to be reduced by 27 vehicles in order to avoid unmitigable construction traffic impacts. This corresponds with an approximately 25 percent reduction in construction workers. This level of reduction in the number of peak construction workers would likely require a commensurate reduction in development program or result in a longer construction schedule, which would extend completion beyond the planned 2031 build year. Therefore, such reduction in workers would not allow the Proposed Development to meet its goal of developing the Proposed Development program and of completing construction in 2031.

Significant adverse construction noise impacts are predicted to occur at one sensitive receptor as a result of construction of the Proposed Development. Construction work would be required to adhere to New York City's construction noise regulations, including the requirement to prepare and implement a Construction Noise Mitigation Plan, and to construct an 8-foot-tall construction noise barrier. The construction barrier is assumed in the noise modeling analysis. Even with adherence to these measures, construction noise would exceed the threshold for a significant construction noise impact at one receptor location during certain phases of construction. In addition, the New York City Noise Control Code limits construction activities to weekdays between the hours of 7:00 AM and 6:00 PM. Project-specific noise control measures are described in the Construction Noise Mitigation Plan and can include a variety of source and path controls, as detailed in **Chapter 19, Mitigation**. Even accounting for the types of measures incorporated into the Proposed Development to reduce construction noise, any development comparable in scale to the Proposed Development would have the potential to result in an unmitigated temporary significant adverse construction noise impact at the identified sensitive receptor. Therefore, no practicable alternative could be developed to avoid this temporary construction noise impact without substantially compromising the Proposed Development's purpose and need.

No-Action Alternative

Description of the No-Action Alternative

The No-Action Alternative examines future conditions absent approval of the Proposed Actions (the "No-Action condition" described and analyzed throughout the EIS).

As discussed in **Chapter 1, Project Description**, the relocation of the existing NYCTA Facility on Lot 1 and long-term land lease with the MTA require MTA Board approval, which is a discretionary action subject to SEQRA. Because Lot 25 is zoned M3-1, construction of the Greenpoint Monitor Museum and publicly accessible waterfront open space would not be feasible without the Proposed Actions. Further, without the Proposed Actions, no new development would occur on the NYCTA Relocation Site at 213 Meadow Street. Without the relocation of the existing NYCTA Facility on Lot 1, the relocation of the NYCTA ERU Facility would not occur, and that site would not be available for the full development of the City's planned Box Street Park. As such, in the No-Action Alternative, it is

assumed that the existing conditions would remain on the Development Site, NYCTA Relocation Site, and ERU Site.

As described below, the No-Action Alternative would not meet the goals and objectives of the Proposed Actions and the scale and type of housing, including affordable housing, and public realm benefits (approximately 50,000 sf of open space including a 34,000-sf WPAA and 9,000 sf of PAA) expected from the Proposed Actions would not be realized. In addition, under this alternative, the planned expansion of Bushwick Inlet Park would form a dead end at the site of the undeveloped shoreline of Lot 25 and the back of the existing NYCTA Facility, limiting the connectivity of the waterfront. The No-Action Alternative would not facilitate the development of much-needed affordable housing, publicly accessible open space, or a new community museum.

Conditions under the No-Action Alternative in comparison to the future with the Proposed Actions are described below.

Land Use, Zoning, and Public Policy

In the No-Action Alternative, the existing land uses would remain at the Development Site, the NYCTA Relocation Site, and the ERU Site. The existing NYCTA Facility would remain on Lot 1 within the Development Site, and Lot 25 would remain vacant and undeveloped. The existing material and vehicle storage area would remain on the NYCTA Relocation Site, and the NYCTA ERU Facility would remain on the ERU Site.

As described in **Chapter 2, Land Use, Zoning, and Public Policy**, the study area for land use is undergoing a rapid transformation from a primarily industrial and manufacturing area towards a residential and mixed-use neighborhood, particularly along the waterfront. A significant amount of development is anticipated to occur in the quarter-mile study area by 2031, introducing approximately 814 residential units, 728,654 zsf of commercial floor area, 3,300 zsf of community facility floor area, and 138,048 zsf of manufacturing zoning floor area.

Under the No-Action Alternative, it is anticipated that there would be no changes to zoning or public policy affecting the Development Site, the NYCTA Relocation Site, or their respective study areas.

The No-Action Alternative would not achieve the beneficial changes regarding land use, zoning, and public policy that would result from the Proposed Actions. There would be no open space or community facility uses provided in the No-Action Alternative. Unlike the future With-Action condition, the No-Action Alternative would not allow for the development of affordable and market-rate housing at the Development Site, as the existing NYCTA Facility could not be relocated to a more appropriate location. As such, the NYCTA Facility would remain as a non-conforming use within the existing R6 and R6/C2-4 zoning district, and would continue to represent a physical barrier between the existing residential community and the waterfront. Lot 25 would remain unimproved with a deteriorating shoreline. Since it would not be feasible to improve Lot 25 without the Proposed Actions, it would remain inaccessible to the public and no community facility space would be provided to facilitate development of the Monitor Museum. Without the mapping of an MIH area, there would be no mechanism for ensuring permanent housing affordability on the Development Site.

The No-Action Alternative would be less supportive of public policies that aim to increase the supply of housing and affordable housing, such as *Housing New York 2.0, OneNYC 2050*, and *Housing Our Neighbors: A Blueprint for Housing and Homelessness.*

Overall, neither the No-Action Alternative nor the Proposed Development would result in significant adverse impacts to land use, zoning, or public policy. However, compared to the Proposed Actions, the No-Action Alternative would not result in any of the anticipated benefits with respect to land use and public policy, and the existing underutilized and incompatible land use and zoning conditions would remain at the Development Site.

Socioeconomic Conditions

Neither the No-Action Alternative nor the Proposed Actions would cause a significant adverse impact on socioeconomic conditions.

Like the Proposed Actions, the No-Action Alternative would not result in direct residential or business displacement, nor would there be any significant adverse impacts related to indirect business displacement due to effects on a specific industry, increased rents, or retail market saturation.

Both in the future With-Action condition and in the No-Action Alternative, new residential developments are anticipated in the half-mile study area, independent of the Proposed Development. Demand for housing is anticipated to continue to rise in Greenpoint and the surrounding neighborhoods. The Proposed Actions represent an opportunity to introduce a substantial amount of housing in a high-demand area, which could provide a socioeconomic benefit by increasing the supply of affordable and market-rate rental housing. In contrast with the future With-Action condition, the No-Action Alternative would not allow for residential development, nor would there be an MIH area mapped on the Development Site. As such, the potential socioeconomic benefits of the Proposed Actions (the provision of housing including permanently affordable housing pursuant to MIH) would not be achieved under the No-Action Alternative, as described in **Chapter 3, Socioeconomic Conditions**.

Community Facilities and Services

The No-Action Alternative would not alter any existing community facilities, whether by displacement of the facility or other physical change. Therefore, neither the No-Action Alternative nor the Proposed Actions would result in significant adverse impacts due to direct effects on community facilities and services. However, it should be noted that unlike the Proposed Actions, the No-Action Alternative would not include the development of approximately 35,000 gsf of community facility space for a permanent home for the Greenpoint Monitor Museum, a community facility use.

As detailed in **Chapter 4, Community Facilities and Services**, the Proposed Actions would not result in a significant adverse impact to public schools, early childhood centers, libraries, police and fire services, or healthcare services. The No-Action Alternative would not introduce any residential uses, and therefore would not warrant analysis of public schools, early childhood centers, libraries, police and fire services, or healthcare services. As such, neither the No-Action Alternative, nor the Proposed Development would result in any significant adverse impacts to community facilities and services.

Open Space

Neither the Proposed Actions nor the No-Action Alternative would directly affect existing open spaces. However, the No-Action Alternative would not introduce any open space, while the Proposed Actions would introduce approximately 50,000 sf of new open space, including a 34,000-sf WPAA

and 9,000 sf of PAA. The Proposed Actions would also enable the full realization of Box Street Park at the ERU Site in the future, which would not be possible in the No-Action Alternative. In the No-Action Alternative, the existing NYCTA Facility would remain at the Development Site, serving as a barrier between the waterfront and the surrounding neighborhood. No development would occur on Lot 25 and the shoreline would continue to deteriorate. There would be no connection between Bushwick Inlet Park and West Street or between Bushwick Inlet Park and the Shore Public Walkway to the north, and instead, the existing open spaces along the waterfront would remain disconnected from one another. Resiliency improvements in connection with the proposed open space and the proposed redevelopment of Lot 25 would not occur.

As the No-Action Alternative would not introduce new residents or workers to the Development Site or NYCTA Relocation Site, there would be no potential for indirect effects on open space due to residential or non-residential population. In the No-Action Alternative, there is a substantial amount of residential development that is anticipated to occur within the half-mile open space study area, adding roughly 5,166 residents compared to existing conditions. Several new open spaces would also be completed by the 2031 analysis year. Like the Proposed Actions, there would be no significant adverse open space impacts associated with the No-Action alternative.

Shadows

In the No-Action Alternative, the existing buildings would remain on the Development Site and the NYCTA Relocation Facility; their shadows would be the same as under existing conditions. While the Proposed Actions would introduce development that would cast shadows on several sunlight-sensitive resources, there would be no significant adverse shadows impacts under either the No-Action Alternative or the Proposed Actions.

Historic and Cultural Resources

The Landmarks Preservation Commission (LPC) has determined that neither the Development Site nor the NYCTA Relocation Site possess archaeological or architectural sensitivity. Therefore, like the Proposed Actions, the No-Action Alternative would not affect archaeological resources. It should be noted that the No-Action Alternative would not allow for the development of approximately 35,000 gsf of space for the Greenpoint Monitor Museum, which would occur in the With-Action condition. As such, the No-Action Alternative would not facilitate the construction of a museum celebrating the maritime history of Greenpoint and the construction of the USS Monitor.

Urban Design and Visual Resources

Under the No-Action Alternative, the existing buildings would remain on the Development Site and the NYCTA Relocation Site. Several new developments are anticipated in the 400-foot study area for urban design and visual resources absent the Proposed Actions. Any potential benefits to the Development Site associated with the Proposed Actions, as discussed in **Chapter 8, Urban Design and Visual Resources** (e.g., the introduction of publicly accessible open space and the removal of a non-conforming industrial building that acts as a barrier to the waterfront) would not occur under the No-Action Alternative. While neither the No-Action Alternative nor the Proposed Actions would result in significant adverse impacts related to urban design and visual resources, the existing conditions and anticipated conditions under the No-Action Alternative are generally incompatible with surrounding uses and building forms with respect to urban design. In the existing conditions,

the Development Site is occupied by an outdated industrial building that is not pedestrian-oriented. This condition does not represent efficient use of the Development Site, especially given its prominent location along the Greenpoint waterfront. Under the No-Action Alternative, the existing poor streetscape design and pedestrian condition would remain at the Development Site. The With-Action condition would significantly improve the pedestrian experience in the area.

Natural Resources

In the No-Action Alternative, ongoing shoreline stabilization measures to prevent further erosion of the shoreline revetment and adjacent upland areas may continue at the Development Site. If shoreline stabilization measures are discontinued, it is expected that erosion of the shoreline revetment and adjacent upland areas would continue to occur. Therefore, absent construction of the new bulkhead, the Development Site's coastal resiliency would be compromised, leading to potential water intrusion that could adversely affect the Development Site and the adjacent Bushwick Inlet Park, as well as surrounding areas. Due to the presence of the existing NYCTA Facility, the eastern portions of the Development Site would continue as unvegetated/impervious surfaces that are largely insignificant from an ecological perspective. Within the existing vegetated and unvegetated areas of the Urban Vacant Lot community that have been raised through the placement of fill materials, ecological succession to shrub- and tree-dominated conditions would occur over time, barring future periodic maintenance or additional disturbance. It is further expected that the non-native/invasive plant populations that currently occur at the Development Site would continue to proliferate and serve as a seed source for the spread of these species at other adjoining and nearby properties surrounding Bushwick Inlet, including Bushwick Inlet Park, where habitat restoration efforts to establish native plant communities are currently underway.

Hazardous Materials

In the No-Action Alternative, the existing (E)-Designation on the Development Site (E-138) would remain; however, no further assessment of hazardous materials would be conducted in the absence of any development and an (E) designation for hazardous materials investigation and remediation measures would not be placed on the NYCTA Relocation Site. Consequently, confirmed contaminants present on the Development Site and NYCTA Relocation Site would go unmitigated and regulatory agency oversight would not be provided.. It is assumed that the NYCTA Relocation Site would continue operating under existing conditions and that no environmental remediation or mitigation would be performed.

Water and Sewer Infrastructure

As with the Proposed Actions, there would be no significant adverse impacts to the City's water supply, wastewater and stormwater conveyance, or sewer infrastructure under the No-Action Alternative. Since no development would occur at the Development Site or the NYCTA Relocation Site, there would be no changes to water demand, sanitary flows, or stormwater flows from the Development Site or NYCTA Relocation Site compared to the existing conditions. As with the Proposed Actions, the Newtown Creek Wastewater Resource Recovery Facility (WRRF) would continue to have adequate capacity to handle wastewater from the Development Site and NYCTA Relocation Site.

Transportation

Under the No-Action Alternative, traffic, transit, and pedestrian volumes would increase due to background growth and developments in the study area. The majority of traffic movements analyzed would operate at acceptable levels of service under the No-Action Alternative. There are several new developments that are assumed to be completed by the 2031 build year. As these No-Action developments are constructed, general street improvements and sidewalk amenities such as street trees are anticipated to be added, which would improve the pedestrian experience throughout the study area. Absent the Proposed Actions, no new trips would be generated by the Proposed Development. Therefore, there would be no significant adverse impacts to transportation under the No-Action Alternative.

Air Quality

Similar to the With-Action condition, the No-Action Alternative would not result in significant adverse air quality impacts due to stationary or mobile sources because no development would occur on the Development Site or NYCTA Relocation Site.

Greenhouse Gas Emissions Climate Change

As no new development would occur under the No-Action Alternative, there would be no significant changes to energy consumption and carbon dioxide equivalent (CO_2e) emissions per year. Neither the Proposed Actions nor the No-Action Alternative would result in significant greenhouse gas emissions or climate change impacts.

Noise

As there would be no new development on the Development Site or NYCTA Relocation Site, there would be no new vehicle trips or stationary-source noise generators. Existing noise levels at the Development Site are anticipated to increase in the No-Action Alternative due to background growth; however, no development is anticipated to occur on the Development Site without the Proposed Actions. Like the With-Action condition, the No-Action Alternative would not result in significant adverse noise impacts.

Public Health

Under the No-Action Alternative, there would be no new on-site development. As such, no unmitigated significant adverse impacts would occur in the areas of hazardous materials, air quality, noise, or construction, and thus there would be no significant adverse public health impacts under the No-Action Alternative. However, the NYCTA Facility would remain in its current location as a non-conforming industrial use at the Development Site where it is surrounded by several sensitive residential uses.

Neighborhood Character

No project development would occur under the No-Action Alternative. The development trends in the area surrounding the Development Site (discussed in **Chapter 17, Neighborhood Character**) are anticipated to continue in the No-Action Alternative. The existing condition would remain at the

NYCTA Relocation Site. Therefore, the No-Action Alternative would not result in a significant adverse impact to neighborhood character. However, the existing NYCTA Facility remaining at the Development Site would represent an incompatible condition with respect to neighborhood character because it is a nonconforming use and acts as a barrier to public waterfront access, and because the existing NYCTA Facility would continue to be incompatible with the increasing residential uses and residential population in the surrounding area.

Construction

The No-Action Alternative would not involve new construction. Therefore, the No-Action Alternative would not result in a significant adverse construction impact.

Disadvantaged Communities

As described in **Chapter 24, Effected on Disadvantaged Communities**, a disproportionate pollution burden is a pollution burden within an affected disadvantaged community (DAC) that is, or would be, significantly greater than that same burden in comparable non-DACs, as a result of a proposed action. In the No-Action Alternative, the Development Site and the NYCTA Relocation Site (both of which are in Disadvantaged Communities) would remain as in existing conditions, and there would be no significant adverse impacts. However, none of the potential benefits associated with the Proposed Actions, including the provision of affordable housing, new open space, and new community facility space, would occur.

Existing Zoning Alternative

Description of the Existing Zoning Alternative

The Existing Zoning Alternative assumes that the Applicants would seek MTA Board Approval (a discretionary action subject to SEQRA) to relocate the existing NYCTA Facility on Lot 1, and that subsequent development on the Development Site would be undertaken pursuant to the existing R6 and R6/C2-4 zoning district. Lot 25 would remain in its existing condition. This alternative would include approximately 280 market-rate DUs and approximately 10,000 gsf of local retail space. While the Existing Zoning Alternative would result in impacts similar to the Proposed Actions, it would not provide a number of the public benefits that would be delivered with the Proposed Development. The Existing Zoning Alternative would not provide any affordable housing, and would not provide some of the public realm benefits of the Proposed Development, including a new Shore Public Walkway, long-term funding to the City/NYC Parks for the operation of Bushwick Inlet Park, and development of the Greenpoint Monitor Museum to celebrate maritime history. Additionally, shoreline stabilization measures and resiliency improvements would not occur in this alternative. **Table 20-1** shows a comparison between the Proposed Development and the Existing Zoning Alternative.

Table 20-1 Proposed Development – Existing Zoning Alternative Comparison

	Proposed Development	Existing Zoning Alternative
Residential	1,150 DUs 300 MIH DUs	280 DUs 0 MIH DUs
Commercial	36,500 gsf local retail	10,000 gsf local retail
Community Facility	35,000 gsf museum (Monitor Museum)	No community facility
Open Space and Resiliency	50,000-sf total 34,000-sf WPAA, 9,000-sf PAA Shoreline restoration	Limited green space No waterfront access No shoreline restoration

Land Use, Zoning, and Public Policy

Like the Proposed Actions, the Existing Zoning Alternative would introduce a mixed-use development at the Development Site. However, compared to the Proposed Actions, the Existing Zoning Alternative would result in up to 870 fewer residential units (300 fewer MIH DUs, meaning no affordable units would be provided), no community facility space (there would be no space for the Greenpoint Monitor Museum), and 26,500 gsf less retail space. Neither the Existing Zoning Alternative nor the Proposed Actions would result in significant land use impacts.

The Existing Zoning Alternative would not involve any zoning changes, and there would be no significant adverse impacts related to zoning. However, the existing zoning would lead to a development with less overall housing and no affordable housing, and fewer community benefits compared to development under the proposed zoning.

The Existing Zoning Alternative would have a less beneficial effect regarding the Greenpoint-Williamsburg Waterfront Access Plan in comparison to the Proposed Actions, since this alternative would provide the upland connection, but no new public waterfront access or Shore Public Walkway, and no shoreline restoration benefits. Compared to the Proposed Actions, the Existing Zoning Alternative would be less supportive of public policies that aim to increase the supply of housing and, specifically, affordable housing, such as Housing New York 2.0, OneNYC 2050, and Housing Our Neighbors: A Blueprint for Housing and Homelessness.

Socioeconomic Conditions

Neither the Existing Zoning Alternative nor the Proposed Actions would result in a significant adverse impact on socioeconomic conditions. Like the Proposed Actions, the Existing Zoning Alternative would not result in direct residential or business displacement, nor would there be any significant adverse impacts related to indirect business displacement due to effects on a specific industry, increased rents, or retail market saturation.

The Existing Zoning Alternative would result in the construction of no affordable housing and fewer market-rate housing units compared to the Proposed Actions, and therefore would be less supportive of the project's goal of creating new opportunities for affordable housing development and addressing the city's housing crisis. The Existing Zoning Alternative would provide no community facility space, with no space for the Greenpoint Monitor Museum, and 26,500 gsf less retail space, leading to less economic activity at the Development Site compared to the Proposed Actions.

Community Facilities and Services

Like the Proposed Actions, the Existing Zoning Alternative would not result in any impacts to community facilities and services. There would be no significant adverse impacts related to direct or indirect effects on public elementary, intermediate, and high schools, library services, police, fire, emergency medical services, or publicly funded early childhood programs in the future with the Proposed Actions or in the Existing Zoning Alternative. Compared to the Proposed Actions, the Existing Zoning Alternative would introduce fewer children eligible for publicly funded early childhood programs, fewer public elementary, intermediate, and high school students, and fewer public library users. Therefore, similar to the Proposed Actions, the Existing Zoning Alternative would not result in any significant adverse impacts to community facilities and services. Compared to the Proposed Actions, the Existing Zoning Alternative would provide no community facility space, and there would be no space for the Greenpoint Monitor Museum.

Open Space

Like the Proposed Actions, the Existing Zoning Alternative would not result in any impacts to open space. Neither the Proposed Actions nor the Existing Zoning Alternative would eliminate any existing open spaces. The Existing Zoning Alternative would not cause indirect open space impacts due to added residential or worker population. The Existing Zoning Alternative would introduce fewer workers and residents compared to the With-Action condition. Since there would be no indirect open space impacts under the Proposed Actions, the Existing Zoning Alternative would also not cause indirect open space impacts. However, development of the Existing Zoning Alternative would provide limited open space on the Development Site, no public waterfront access, and no connectivity between Bushwick Inlet Park and the Shore Public Walkway to the north of the Development Site, which would be provided in the With-Action condition.

Shadows

Like the Proposed Actions, the Existing Zoning Alternative would not result in significant adverse impacts related to shadows. Development under the Existing Zoning Alternative would have a substantially lower height compared to the development envelope under the Proposed Actions. As such, shadows from the Existing Zoning Alternative buildings would be smaller than under the Proposed Actions and incremental shadow durations and coverage under the Existing Zoning Alternative would be less compared to the Proposed Actions. Therefore, similar to the Proposed Actions, the Existing Zoning Alternative would not result in significant adverse shadows impacts.

Historic and Cultural Resources

As noted above, LPC has determined that the Development Site does not possess archaeological or architectural sensitivity. Therefore, like the Proposed Actions, the Existing Zoning Alternative would not affect archaeological resources. Unlike the Proposed Actions, the Existing Zoning Alternative would not facilitate the construction of a museum celebrating the maritime history of Greenpoint and the construction of the USS Monitor.

Urban Design and Visual Resources

Both the Existing Zoning Alternative and the Proposed Actions would result in the construction of new mixed-use buildings at the Development Site. Since the Existing Zoning Alternative would not involve any changes in zoning, there would be no significant adverse impacts to urban design and visual resources. However, buildings constructed under the Existing Zoning Alternative would be substantially lower in height than development under the Proposed Actions. As discussed in **Chapter 8, Urban Design and Visual Resources**, the taller buildings constructed under the Proposed Actions would be compatible with existing and planned development in the surrounding area. Like the Proposed Actions, the Existing Zoning Alternative would not result in significant adverse impacts to urban design and visual resources.

Hazardous Materials

As outlined in **Chapter 8, Hazardous Materials**, there is an existing (E)-Designation for hazardous materials on the Development Site. Any development on Lot 1 under the Existing Zoning Alternative would need to comply with the requirements of the (E)-Designation, as outlined in **Chapter 8**. Lot 25 would remain undeveloped in the Existing Zoning Alternative and any potential adverse conditions on Lot 25 would remain unremediated.

Water and Sewer Infrastructure

As with the Proposed Actions, there would be no significant adverse impacts to the City's water supply, wastewater and stormwater conveyance, or sewer infrastructure under the Existing Zoning Alternative. With fewer residential units, the Existing Zoning Alternative would result in less domestic water demand, as compared to the Proposed Actions. Similar to the development facilitated by the Proposed Actions, the Existing Zoning Alternative would not result in a significant increase in water demand over the No-Action condition. As with the Proposed Actions, the Newtown Creek WRRF would continue to have adequate capacity to handle wastewater from the Development Sites. No shoreline restoration work would occur on Lot 25 under this alternative.

Transportation

As described in **Chapter 12, Transportation**, the Proposed Actions would result in significant adverse traffic and pedestrian impacts; impacts to transit would not occur with the Proposed Development. As shown in **Table 20-1**, the Existing Zoning Alternative development program would be smaller compared to the Proposed Development. In particular, there would be 870 fewer DUs, 26,500 gsf less retail, and no community facility space. A travel demand assessment indicates that compared to the Proposed Development, the Existing Zoning Alternative would generate between approximately 75 percent to 76 percent fewer person trips, 76 percent to 79 percent fewer transit trips (i.e., bus, subway, and ferry trips), 72 percent to 75 percent fewer pedestrian trips, and between 74 percent to 79 percent fewer vehicle trips.

The Existing Zoning Alternative would not have the potential for significant adverse impacts to transit.

However, as described below in **No Unmitigable Significant Adverse Impacts Alternative**, an unmitigated significant adverse traffic impact would be generated by even a modest development program, i.e., 45 residential DUs or 1,150 gsf of local retail space would result in an unmitigated

significant adverse impact at the intersection of Franklin Street and Quay Street during the Weekday PM peak hour. As the Existing Zoning Alternative would result in a development exceeding those levels, this alternative would have the potential to result in one or more unmitigated significant adverse transportation-related impacts.

Air Quality

The Existing Zoning Alternative would generate fewer vehicular trips than the Proposed Actions. Consequently, the Existing Zoning Alternative would result in lower mobile source pollutant concentrations than the Proposed Actions. As such, similar to the Proposed Actions, no significant adverse mobile source air quality impacts would result due to project-generated traffic. Since there would be fewer parking spaces provided under the Existing Zoning Alternative compared to the Proposed Actions, there would be no potential for a significant adverse air quality impact due to the parking garage.

In the Existing Zoning Alternative, it is expected that electric HVAC and hot water systems would be implemented, and no significant adverse impacts would occur.

Like the Proposed Actions, the Existing Zoning Alternative would not result in any significant adverse impacts due to emissions from existing light industrial and manufacturing sources, including cumulative impacts.

Like the Proposed Actions, there would be no significant adverse air quality impacts due to development on the NYCTA Relocation Site, since the NYCTA Replacement Facility would not introduce a sensitive receptor to the site.

Noise

The Existing Zoning Alternative would generate fewer vehicular trips than the Proposed Actions. Consequently, the Existing Zoning Alternative would result in a lesser mobile source noise increment compared to the Proposed Actions. However, the existing noise levels at the Development Site are Marginally Unacceptable according to Noise Exposure Guidelines For Use in City Environmental Impact Review. As such, iIn the Existing Zoning Alternative, it is expected that any future development on the Development Site would be subject to an enforcement mechanism (such as a Restrictive Declaration or an (E)-Designation) requiring minimum amounts of window-wall noise attenuation, and future sensitive receptors on the Development Site could be subject to elevated noise levels, however less increment compared with the With-Action condition. Like the With-Action condition, the Existing Zoning Alternative would not be expected to result in significant adverse noise impacts.

Neighborhood Character

Like the Proposed Actions, the Existing Zoning Alternative would result in the redevelopment of the Development Site with new mixed-use buildings. Neither the Proposed Actions nor the Existing Zoning Alternative would result in significant adverse impacts on neighborhood character in the area. Both alternatives would improve the neighborhood character of the area by redeveloping an underutilized site with new mixed-use buildings with active ground floor uses and introducing a 24-hour resident population to the Development Site. The NYCTA Relocation Site would also be redeveloped with a new building that would represent an improvement compared to the existing open storage yard. However, the Existing Zoning Alternative would provide no affordable housing, limited open space, no waterfront

connectivity, and no community facility space, leading to fewer neighborhood character benefits compared to the Proposed Actions. Lot 25 would remain unimproved, the Monitor Museum would not be constructed, and no shoreline restoration would occur.

Public Health

Neither the Proposed Actions nor the Existing Zoning Alternative would result in significant adverse public health impacts. During both construction and operation, the Existing Zoning Alternative would not have the potential for unmitigated significant adverse impacts in any of the technical areas related to public health.

Construction

Like the Proposed Actions, construction of the Existing Zoning Alternative would not result in significant adverse impacts related to land use, zoning, and public policy, neighborhood character, socioeconomic conditions, community facilities and services, open space, natural resources, hazardous materials, water quality, or air quality.

Like the Proposed Actions, the Existing Zoning Alternative would not have a significant impact on air quality during the construction period. Measures required to reduce pollutant emissions during construction include all applicable laws, regulations, and the City's building codes. These include dust suppression measures, idling restriction, and the use of ultra-low sulfur diesel (ULSD) fuel and best available tailpipe reduction technologies. With the implementation of these emission reduction measures, the dispersion modeling analysis of construction-related air emissions for both on-site and on-road sources determined that particulate matter ($PM_{2.5}$ and PM_{10}), annual-average nitrogen dioxide (NO_2), and carbon monoxide (CO) concentrations would be below their corresponding *de minimis* thresholds or National Air Quality Ambient Standards (NAAQS), respectively (see **Chapter 18, Construction**). Since the Existing Zoning Alternative would involve less emissions from mobile sources and stationary sources during construction compared to the Proposed Actions, there would be no significant adverse air quality impacts during construction under the Existing Zoning Alternative.

As noted in **Chapter 18, Construction**, construction activity at the Development Site under the Proposed Actions would have the potential to result in significant adverse traffic and pedestrian impacts. The Existing Zoning Alternative would have a much smaller development program compared to the Proposed Development. As noted above, with the Existing Zoning Alternative between approximately 74 percent to 79 percent fewer vehicle trips would be generated. Assuming a commensurate reduction in peak construction traffic and pedestrian trips, the Existing Zoning Alternative would still generate a level of peak hour traffic exceeding the *CEQR Technical Manual* Level 1 screening threshold for traffic of 50 or more vehicles per hour. Therefore, there is a potential for significant adverse construction traffic and pedestrian impacts under the Existing Zoning Alternative. The construction of the Existing Zoning Alternative would result in a reduction in the duration of construction but not the level of activities (intensity), it is anticipated that noise levels at the receptors identified in **Chapter 18, Construction**, would continue to exceed the thresholds for exterior increase in noise as well as the thresholds for acceptable interior noise levels for residential uses during construction, and there would be similar significant adverse noise impacts. Like the Proposed Actions, the Existing Zoning Alternative would not result in any significant adverse impacts due to construction at the NYCTA Relocation Site.

Disadvantaged Communities

Under the Existing Zoning Alternative, like under the Proposed Actions, there would be no potential to cause disproportionate effects on disadvantaged communities, nor would the Existing Zoning Alternative cause or increase a pollution burden on a disadvantaged community. The Existing Zoning Alternative would introduce similar land uses to the Development Sites as under the Proposed Actions, but with less density, and with no space for the Greenpoint Monitor Museum. Residents of disadvantaged communities would not experience potential benefits of the Proposed Actions including the addition of new affordable housing or a new Shore Public Walkway. Further, there would be no contribution for the operation of the adjacent Bushwick Inlet Park, the Greenpoint Monitor Museum celebrating maritime history would not be developed, the connection between Bushwick Inlet Park and the Shore Public Walkway to the north at Calyer Place would not be made, and there would be limited connectivity between waterfront open spaces to the north and south of the Development Site.

No Unmitigated Significant Adverse Impacts Alternative

The No Unmitigated Significant Adverse Impacts Alternative examines a scenario in which the projected density increase and other components of the Proposed Actions are changed specifically to avoid the unmitigable significant adverse impacts associated with the Proposed Actions. The Proposed Actions would result in potential unmitigable significant adverse transportation impacts, specifically impacts to traffic and pedestrians under future operational conditions and during peak construction.

Transportation

Under operational conditions, the Proposed Actions would result in significant adverse traffic impacts which could not be fully mitigated with standard traffic capacity improvement measures at two intersections during the weekday AM peak hour, at one intersection during the weekday midday and weekday PM peak hours, and at three intersections during the Saturday peak hour. Additionally, the Proposed Actions would result in significant adverse pedestrian impacts that could not be fully mitigated with standard capacity improvement measures at one crosswalk in all peak hours analyzed, and at one corner during the Saturday peak hour.

A sensitivity analysis was conducted at key intersections within the study area to determine the minimum level of travel demand that would result in any unmitigable transportation-related significant adverse impacts. This analysis determined that the addition of just three inbound project-generated vehicles (two to the northbound left-turn movement plus one to the southbound right-turn movement) at the intersection of Franklin Street and Quay Street during the weekday PM peak hour would result in a significant adverse traffic impact that could not be mitigated. To avoid this unmitigable transportation-related impact, the Proposed Development would need to be reduced to just 45 residential DUs, representing approximately 4 percent of the 1,150 total DUs being proposed, or to 1,400 gsf of local retail space, representing approximately 4 percent of the 36,500 gsf of local retail space being proposed. Therefore, to avoid any unmitigable significant adverse transportation-related impacts, the Proposed Development's program would have to be substantially reduced below the thresholds described above, which would eliminate all of the proposed community benefits, or the Development Site would have to remain in its existing condition. Neither option would meet the goals and objectives of the Proposed Actions.

Construction

Transportation

Under construction conditions, the Proposed Actions would result in significant adverse construction traffic impacts which could not be fully mitigated with standard traffic capacity improvement measures at one intersection during the construction PM peak hour – impacts during the construction AM peak hour would be mitigable. Additionally, under construction conditions, there is a potential for the Proposed Actions to result in unmitigated significant adverse construction pedestrian impacts as unmitigable pedestrian impacts were identified under operational conditions.

A sensitivity analysis was conducted for the intersection of McGuinness Boulevard and Greenpoint Avenue, where the impact to the eastbound approach was identified as unmitigable during the weekday PM construction peak hour. This analysis determined that the volume of construction worker vehicles traveling in the eastbound through direction would have to be reduced by 27 vehicles during the weekday PM construction peak hour in order to avoid unmitigable construction traffic impacts. This corresponds with an approximately 25 percent reduction in construction workers. This level of reduction in the number of peak construction workers would likely require a commensurate reduction in development program or result in a longer construction schedule, which would extend completion beyond the planned 2031 build year. Therefore, such reduction in workers would not allow the Proposed Development to meet its goal of developing the Proposed Development program and completing construction in 2031.

Noise

Significant adverse noise impacts are predicted to occur at one sensitive receptor as a result of construction of the Proposed Development. As detailed in **Chapter 19, Mitigation**, construction work would be required to adhere to New York City's construction noise regulations, including the requirement to prepare and implement a Construction Noise Mitigation Plan and to construct an 8-foot-tall construction noise barrier. While these measures are assumed in the noise modeling analysis, construction noise would exceed the threshold for a significant adverse construction noise impact at one receptor location during certain phases of construction. In addition, the New York City Noise Control Code limits construction activities to weekdays between the hours of 7:00 AM and 6:00 PM and requires that a Construction Noise Mitigation Plan be implemented. Project-specific noise control measures are described in the Construction Noise Mitigation Plan and can include a variety of source and path controls, as detailed in **Chapter 19, Mitigation**.

However, construction of the Proposed Development during the most noise-intensive construction activity nearest a receptor would result in interior noise levels during certain construction hours of up to 54.4 dBA (L_{10}), which is 9.4 dBA greater than the level considered acceptable according to *CEQR Technical Manual* noise exposure guidelines. Consequently, significant adverse noise impacts predicted to occur at the impacted residential receptor would be only partially mitigated. Source or path controls beyond those already identified for the construction of the Proposed Development would not be effective in reducing the level of construction noise at the receptors at the third floor or above. Even accounting for the types of measures incorporated into the Proposed Actions to reduce construction noise, any development comparable in scale to the Proposed Development would have the potential to result in an unmitigated temporary significant adverse construction noise impact. Therefore, no practicable alternative could be developed to avoid the temporary construction noise impact without substantially compromising the Proposed Development's purpose and need.