RIVER RING
Chapter 20: Alternatives

A. INTRODUCTION

As described in the 2020 *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 Actions would facilitate the redevelopment of a vacant waterfront site in the Williamsburg neighborhood of Brooklyn Community District (CD) 1 with an approximately 1,336,000-gsf mixed-use commercial/residential/community facility development (the Applicant's "Proposed Development"). The Proposed Development would consist of approximately 1,250 dwelling units, of which 313 units (25%) would be affordable, 50,000 gsf of community facility space, 83,000 gsf of commercial space (including 60,000 gsf of office and 23,000 gsf of local retail), and approximately 83,000 gsf of below-grade parking (up to approximately 250 accessory attended parking spaces). Although plans are still in the preliminary stages, the Applicant intends to house a community center within the community facility space.

Additionally, approximately 126,308 sf (2.9 acres) of new public open space (plus 2.32 acres of secondary contact accessible in-river space and 0.86 acres of intertidal area) would be created, expanding the open space network along the East River waterfront to facilitate a continuous public waterfront experience spanning from Bushwick Inlet Park to the north, to Grand Ferry Park and Domino Park to the south. The new waterfront public space would also include 37,370 sf of intertidal area, and 101,099 sf of secondary contact accessible in-river space; in total 6.08 acres of new waterfront park would be created on the Proposed Development Site.

In addition, as part of the reasonable worst-case development scenario (RWCDS), a non-Applicant owned Projected Development Site at 230 Kent Avenue (Block 2362, Lot 1) is expected to be improved with a three-story, approximately 20,223 gsf mixed-use light industrial, commercial and community facility building as a result of the proposed zoning change.

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

- A No-Action Alternative, which is mandated by CEQR and the State Environmental Quality Review Act (SEQRA) and is intended to provide the lead and involved agencies with an assessment of the expected environmental impacts of no action on their part (i.e., no zoning changes, City Map changes, landfill, zoning certification/authorization, Large Scale General Development (LSGD) special permits, or zoning special permit to reduce parking). Under this alternative, a 621,500 gsf commercial/light industrial development would be constructed as-of-right on the Applicant's Proposed Development Site, and an approximately 13,482 gsf commercial/warehouse development would be developed on the non-Applicant owned Projected Development Site, pursuant to the Project Area's existing M3-1 zoning.

- A No Unmitigated Significant Adverse Impacts Alternative, which considers a development scenario that would not result in any of the identified significant unmitigated adverse impacts.

B. PRINCIPAL CONCLUSIONS

No-Action Alternative

The No-Action Alternative examines future conditions on the Proposed and Projected Development Sites, but assumes that 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 that as-of-right development would be constructed on the Proposed and Projected Development Sites pursuant to the existing M3-1 zoning. Under the No-Action Alternative, as-of-right development on the Proposed Development Site would consist of two buildings, with a combined total floor area of approximately 621,500 gsf, including approximately 54,500 gsf of office uses, 60,100 gsf of destination retail uses, 23,000 gsf of local retail uses, approximately 68,000 gsf of light manufacturing maker space, an approximately 102,100 gsf last-mile distribution facility (Use Group (UG) 16D), and 94,750 gsf of warehouse uses, as well as approximately 579 accessory parking spaces(202,550 gsf) and 16,500 sf of mechanical space. For the Projected Development Site, as-of-right development under the No-Action Alternative would consist of one building with approximately 13,482 gsf, including approximately 6,741 gsf of local retail and 6,741 gsf of warehouse space. The technical chapters of this EIS have described the No-Action Alternative as "the Future Without the Proposed Actions."

The significant adverse impacts related to pedestrian (crosswalk) conditions, pedestrian safety, and construction noise anticipated for the Proposed Actions may be somewhat reduced under the No-Action Alternative. However, the No-Action Alternative would not meet the goals of the Proposed Actions. The benefits expected to result from the Proposed Actions – including promoting affordable and market-rate housing development through the introduction of increased residential density on the Proposed Development Site, the introduction of new community facility space, and the introduction of new publicly accessible waterfront open space – would not be realized under this alternative, and the No-Action Alternative would fall short of the objectives of the Proposed Actions.

No Unmitigated Significant Adverse Impacts Alternative

The No Unmitigated Significant Adverse Impacts Alternative examines a scenario in which the density and other components of the Proposed Development are changed specifically to avoid the unmitigated significant adverse impacts associated with the Proposed Actions. As presented in Chapter 19, "Mitigation," and Chapter 21 "Unavoidable Adverse Impacts," there is the potential for the Proposed Actions to result in unmitigated significant adverse impacts related to construction noise. Given the proximity of existing sensitive receptors to the Proposed Development Site, any development involving below-grade excavation and multi-year construction would likely have the potential to result in temporary unmitigated significant adverse construction noise impacts. Furthermore, the identified temporary significant adverse construction noise impacts at these nearby receptors could not be fully mitigated. Although the Applicant's commitment to provide substantial noise control measures would reduce the level of impacts, it would not fully avoid the identified significant adverse impacts. In order to avoid the occurrence of any temporary adverse construction noise impacts at these nearby sensitive receptors, no construction of structure(s) of a size sufficient to accommodate the uses planned as part of the Proposed Development could occur on the Proposed Development Site. Therefore, no reasonable alternative could

be developed to completely avoid significant adverse construction noise impacts without substantially compromising the Proposed Actions' stated goals.

C. NO-ACTION ALTERNATIVE

The No-Action Alternative assumes that the Proposed Actions are not implemented. This includes no zoning map amendment, no zoning text amendment, no Large-Scale General Development Special Permit, no special permit to reduce required parking, and no City Map change or landfill. Conditions under this alternative are similar to the "Future without the Proposed Actions" described in the preceding chapters, which are compared in the following sections to conditions under the Proposed Actions. The No-Action Alternative incorporates known development projects in the surrounding area that are likely to be built by the analysis year of 2027.

Under the No-Action Alternative, the Applicant would construct two as-of-right buildings, with a combined total floor area of approximately 621,500 gsf, including approximately 545,000 gsf of office uses, 60,100 gsf of destination retail uses, 23,000 gsf of local retail uses, approximately 68,000 gsf of light manufacturing maker space, an approximately 102,100 gsf last-mile distribution facility (UG 16D), and 94,750 gsf of warehouse uses, as well as approximately 579 accessory parking spaces (202,550 gsf) and 16,500 sf of mechanical space. The No-Action Alternative would maximize the permitted FAR of 2.0 on the Proposed Development Site. The northern building on the Proposed Development Site would consist of six stories above grade and one cellar level, with a height of approximately 100 feet to the building roof line (140 feet to top of mechanical bulkhead); whereas the southern building would consist of eight floors above grade and one cellar level, with a height of approximately 110 feet to the building roof line (approximately 150 feet to top of mechanical bulkhead).

On the non-Applicant-owned Projected Development Site, an approximately 13,482 gsf commercial/warehouse development would be constructed under the No-Action Alternative, which would maximize the permitted FAR of 2.0. This No-Action development would consist of two stories, with approximately 6,741 gsf of local retail and 6,741 gsf of warehouse space, as well as 20 accessory parking spaces.

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

Land Use, Zoning, and Public Policy

Under the No-Action Alternative, it is anticipated that the vacant Proposed Development Site would be redeveloped with two as-of-right buildings, and the vacant Projected Development Site would be redeveloped with a single building, all pursuant to the existing M3-1 zoning. The combined No-Action development for the RWCDS would introduce approximately 54,500 gsf of office uses, 60,100 gsf of destination retail uses, 29,741 gsf of local retail uses, approximately 68,000 gsf of light manufacturing maker space, an approximately 102,100 gsf last-mile distribution facility, and 101,491 gsf of warehouse uses, as well as approximately 599 accessory parking spaces and 16,500 sf of mechanical space. As such, the No-Action Alternative would result in a change of land use on the Proposed and Projected Development Sites.

No changes to zoning or public policy are anticipated to the Project Area under the No-Action Alternative. Under this alternative, the existing M3-1 zoning classification of the Project Area would remain and no zoning special permits or other land use actions would be required.

Unlike the Proposed Actions, the No-Action Alternative would not improve land use conditions in the study area by introducing housing opportunities and community facility uses to the area, nor would it provide new publicly accessible waterfront open space. The No-Action Alternative would be less supportive of public policies articulated in *Housing New York*, *PlanNYC*, and *OneNYC* that aim toward increasing the supply of housing in the city, providing public access to the waterfront, and expanding access to affordable housing. In addition, it is the Applicant's belief that the 102,100-gsf last-mile distribution facility would be less appropriate for the Proposed Development Site given the increasingly residential character of the neighborhood since the 2004 Williamsburg Rezoning.

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

Socioeconomic Conditions

Neither the No-Action Alternative nor the Proposed Actions would be expected to have a significant adverse impact on socioeconomic conditions. Similar to the Proposed Actions, the No-Action Alternative would not result in direct residential or business displacement, as the Proposed and Projected Development Sites are currently vacant.

Unlike the Proposed Actions, the M3-1 zoning district would remain under the No-Action Alternative, and no units of market-rate or affordable housing could be constructed. As a result, the benefits of the Proposed Actions, including new permanently affordable housing pursuant to the MIH Program, would not be realized under the No-Action Alternative.

Community Facilities and Services

Unlike the Proposed Actions, the No-Action Alternative would not introduce any new residents to the Proposed Development Site and, therefore, would not result in an increase in demand on area community facilities. Neither the Proposed Actions nor the No-Action Alternative would result in direct impacts to community facilities and services or indirect impacts to schools, library services, child care facilities, or police, fire, and emergency medical services.

Open Space

Similar to the Proposed Actions, the No-Action Alternative would not have any direct impacts on any open space resources.

In terms of indirect effects, the No-Action Alternative would introduce approximately 760 workers to the area, compared to 561 workers and 2,888 residents with the Proposed Actions. Whereas the Proposed Actions are expected to provide 2.9 acres of waterfront open space that would be fully accessible to the public (plus 2.32 acres of secondary contact accessible in-river space and 0.86 acres of intertidal area), the No-Action Alternative would not create any new publicly accessible open spaces. As such, the open space ratios for the study area under the No-Action Alternative would mostly be lower than those under the

Proposed Actions. The No-Action Alternative would result in open space ratios of 0.93, 0.38, and 0.56 acres per 1,000 residents for total, active, and passive open space, respectively. As discussed in Chapter 5, "Open Space," the Proposed Actions would result in open space ratios of 0.95, 0.37, and 0.57 acres per 1,000 residents for total, active, and passive open space, respectively. Although the open space ratios for the study area would be below the *CEQR Technical Manual* open space guidelines for open space adequacy and citywide planning goals under both the No-Action Alternative and the Proposed Actions, the open space benefits that would occur in the future with the Proposed Actions, including the provision of 2.9 acres of in-water experiences, educational programming and a variety of other opportunities for enjoyment of the waterfront by the community at large as well as an additional 2.32 acres of secondary contact accessible in-river space and 0.86 acres of intertidal area, would not occur under the No- Action Alternative.

Shadows

Under the No-Action Alternative, two buildings with a height of approximately 110 feet to the building roofline (140 and 150 feet to top of mechanical bulkhead, respectively) would be constructed at the Proposed Development Site, and a two-story building would be constructed on the Projected Development Site. The longest shadow cast by the No-Action Alternative would extend approximately 645 feet and, as such, would have the potential to reach the East River and North 5th Street Pier and Park. Due to the moderate height of the No-Action Alternative and the height of existing buildings to the north of the Proposed Development Site near the North 5th Street Pier and Park (85 feet and 421 feet), the No-Action Alternative's incremental shadow coverage would be minimal and would occur primarily during the morning hours. Similar to the Proposed Actions, no significant adverse shadow impacts would occur under the No-Action Alternative per CEQR methodology.

Historic and Cultural Resources

As described in Chapter 7, "Historic and Cultural Resources," the Proposed Development Site is not considered to be sensitive for archaeological resources. Similarly, as the Projected Development Site was previously developed with a two-story building with a partial basement, and has undergone extensive environmental cleanup activity, it is unlikely to contain any undisturbed archaeological resources. Therefore, as with the Proposed Actions, the No-Action Alternative would not result in any significant adverse impacts to archaeological resources.

The as-of-right buildings constructed in the Project Area under the No-Action Alternative would be visible behind the S/NR-Listed and NYCL-Eligible Austin, Nichols & Co. Warehouse from certain vantage points; and when looking north in the S/NR-Eligible Grand Street Historic District. Similar to the Proposed Actions, the No-Action Alternative would alter the settings of these historic architectural resources, albeit to a lesser extent. As these resources are located in a densely-developed urban environment, neither the No-Action Alternative nor the Proposed Actions would result in significant adverse indirect or contextual impacts on historic architectural resources.

Urban Design and Visual Resources

Like the Proposed Actions, the No-Action Alternative would not have significant adverse impacts on urban design, view corridors, and visual resources. Similar to the Proposed Actions, under the No-Action Alternative, the Proposed Development Site and Projected Development Site would provide increased foot traffic and a unified streetwall that does not exist at the vacant Proposed and Projected Development

Sites under existing conditions. View corridors towards the waterfront would remain visible from Metropolitan Avenue, though no public access to the waterfront would be available under this alternative. Under the No-Action Alternative, the last-mile distribution facility on the Proposed Development Site would result in increased truck/vehicle activity in the area surrounding the Proposed Development Site. It is the Applicant's opinion that the increased traffic into and out of the Proposed Development Site would create a negative pedestrian experience under the No-Action Alternative. Although structures on the Proposed Development Site would be shorter under the No-Action Alternative than with the Proposed Actions, the urban design benefits associated with the Proposed Actions – including enhancing the pedestrian experience through the improvement of streetscape and sidewalk conditions, creating active, continuous street walls, and providing public access to the waterfront that would help to enhance the pedestrian experience and provide physical and visual connectivity to the waterfront – would not be realized under the No-Action Alternative.

Hazardous Materials

As under the Proposed Actions, the No-Action Alternative would not result in significant adverse hazardous materials impacts. The Proposed Actions would place an (E) designation (E-636) on the upland portions of the Proposed Development Site to ensure that construction would not result in significant adverse hazardous materials impacts. Under the No-Action Alternative, the Proposed Development Site would be redeveloped in accordance with the applicable NYC DOB guidance in terms of safe building demolition and site redevelopment methods. Therefore, there would be no potential for contact with subsurface contamination and no significant risk of human exposure. However, there would be no E-designation requiring OER oversight.

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

Natural Resources

Neither the No-Action Alternative nor the Proposed Actions would result in significant adverse impacts to natural resources. Unlike the Proposed Actions, the No-Action Alternative would not result in any new in-water work; however, existing waterfront and in-water structures would continue to deteriorate and eventually collapse in the water, the waterfront area on the Proposed Development Site would continue to be inaccessible to the public, and the shoreline would continue to erode due to sedimentation of the East River and sinkholes would expand behind the wharf. The beneficial effects of the Proposed Actions on natural resources – including creating public waterfront access areas and landscaping, providing a stable and resilient waterfront, and creating aquatic, upland, and wetland vegetative communities that would promote fish and wildlife habitat development – would not occur under the No-Action Alternative.

Water and Sewer Infrastructure

Compared with the Proposed Actions, the No-Action Alternative would generate less demand on the City's water and sewer infrastructure. However, neither the Proposed Actions nor the No-Action Alternative would result in significant adverse impacts on the City's water supply, wastewater treatment, or stormwater conveyance infrastructure.

Transportation

In the No-Action Alternative, traffic, transit, pedestrian, and parking demand in the study area would increase as a result of the commercial, last-mile distribution facility, warehouse and light industrial uses on the Proposed and Projected Development Sites, as well as background growth and other development projects that could occur in the surrounding area, pursuant to existing zoning (i.e., as-of-right development).

Neither the No-Action Alternative nor the Proposed Actions are likely to result in significant adverse traffic or transit impacts. However, unlike the Proposed Actions, the No-Action Alternative would not result in significant adverse pedestrian impacts at five analyzed crosswalks or a significant pedestrian safety impact on River Street.

Air Quality

Under the No-Action Alternative, a new commercial/light industrial and an on-site accessory parking garage would be constructed on the Proposed Development Site containing approximately 579 accessory parking spaces, and a smaller commercial/warehouse building on the Projected Development Site. Under the No-Action Alternative, emissions from traffic demand in the study area would increase as a result of background growth and development that would occur pursuant to existing zoning (i.e., as-of-right-development) on the Proposed and Projected Development Sites, and other development projects likely to occur in the surrounding area. Unlike the Proposed Actions, the No-Action Alternative would not result in new residential buildings with heating, ventilation, and air conditioning (HVAC) system emissions. However, as the No-Action Alternative, which includes a last-mile distribution facility and destination retail uses, would generate a greater percentage of truck trips and more accessory parking spaces than the Proposed Actions, the No-Action Alternative would likely result in higher mobile source emissions than the Proposed Actions.

Greenhouse Gas Emissions and Climate Change

With less development density than under the Proposed Actions, the No-Action Alternative would have less energy use. However, since greenhouse gas (GHG) emissions are a global problem, not a site-specific one, this does not imply that there would be less emissions overall under the No-Action alternative. Ultimately, much-needed residential uses similar to those with the Proposed Actions may be developed in areas not as well served by transit and with an unknown level of energy efficiency, potentially driving up GHG emissions in NYC. Furthermore, unlike the Proposed Actions, development under the No-Action Alternative would not benefit from the advantages of mixed-use development. As is the case with any as-of-right development in the City, it would not undergo detailed analysis aimed at reducing energy use and GHG emissions, but would simply be required to meet the current building energy code and would be treated as any existing building under future efforts by the City to meet the PlaNYC energy and GHG goals. Neither the Proposed Actions nor the No-Action Alternative would result in any GHG emission or climate change impacts.

Noise

Neither the Proposed Actions nor the No-Action Alternative would result in significant adverse noise impacts. As under conditions in the future with the Proposed Actions, noise levels under the No-Action Alternative would range from the “Acceptable” CEQR noise exposure category to the “Marginally

Acceptable" CEQR noise exposure category. In the No-Action Alternative, traffic volumes would increase in the area due to the commercial/last-mile distribution facility/light industrial uses on the Proposed Development Site, the commercial/warehouse building on the Projected Development Site, general background growth, and other development projects likely to occur in the surrounding area. These increases in traffic would result in an increase in noise levels compared with existing conditions, with increases in L_{eq} noise levels ranging from approximately 0.21 to 4.44 dBA adjacent to the Proposed Development Site. Increases of this magnitude would be readily noticeable. By contrast, the increases in noise levels with the Proposed Actions would be minimal, ranging from 0.00 to 0.17 dBA (compared to No-Action conditions). These increases, would not be perceptible and would not exceed CEQR impact criteria.

Public Health

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

Neighborhood Character

According to the *CEQR Technical Manual*, a proposed action could have a significant adverse neighborhood character impact if it would have the potential to affect the defining features of the neighborhood, either through the potential for a significant adverse impact in any relevant technical area, or through a combination of moderate effects in those technical areas. Like the Proposed Actions, the No-Action Alternative would result in beneficial effects to neighborhood character by reactivating the Proposed and Projected Development Sites, which are currently vacant, with new uses. However, unlike the Proposed Actions, the No-Action Alternative would not introduce residential uses (including affordable housing) or new waterfront public open space that would contribute to the vitality of the streetscape within and adjacent to the Project Area. As a result, the No-Action Alternative would result in lesser improvements to neighborhood character compared to conditions with the Proposed Actions. It is the Applicant's opinion that the No-Action Alternative would be in contrast to the increasingly residential character of the neighborhood, as it would introduce a greater number of trucks and would result in higher noise levels near the Proposed Development Site.

Construction

As described in Chapter 18, "Construction," the Proposed Actions would result in significant construction-related noise impacts. Under the No-Action Alternative, construction on the Proposed Development Site would be limited to the construction of approximately 621,500 gsf, with approximately 54,500 gsf of office uses, 60,100 gsf of destination retail uses, 23,000 gsf of local retail uses, approximately 68,000 gsf of light manufacturing maker space, an approximately 102,100 gsf last-mile distribution facility, and 94,750 gsf of warehouse uses, as well as approximately 579 accessory parking spaces (202,550 gsf) and 16,500 sf of mechanical space. As the No-Action Alternative would involve less new construction, the duration of construction would be shorter and would involve no in-water work. As such, any associated construction-related noise impacts would be more limited in duration. However it is important to note that, given the

proximity of existing sensitive receptors to the Proposed Development Site, any development involving below-grade excavation and multi-year construction would have the potential to result in temporary unmitigated significant adverse construction noise impacts.

As the Proposed Development Site is located within 90 feet of the S/NR-listed and NYCL-eligible Austin, Nichols & Co. Warehouse, any construction on the Proposed Development Site would be subject to the New York City Department of Buildings (DOB)'s Technical Policy & Procedure Notice (TPPN) #10/88. As such, no construction-related impacts on historic resources would occur as a result of either the Proposed Actions or the No-Action Alternative.

D. NO UNMITIGATED SIGNIFICANT ADVERSE IMPACT ALTERNATIVE

According to the *CEQR Technical Manual*, when a project would result in unmitigated significant adverse impacts, it is often CEQR practice to include an assessment of an alternative to the project that would result in no unmitigated impacts. Based on the analyses presented in other chapters of this EIS, there is the potential for the Proposed Actions to result in unmitigated impacts with respect to construction noise. This alternative demonstrates those measures that would have to be taken to eliminate all of the Proposed Actions' unmitigated significant adverse impacts. To determine possible scenarios under this alternative, a screening analysis was used to define the level at which a given building program and/or bulk would trigger any of the *CEQR Technical Manual* thresholds at which impacts in the aforementioned technical areas may occur. As outlined below, to eliminate all unmitigated significant adverse impacts, the Proposed Development would have to be modified to a point where its principal goals and objectives would not be realized.

Construction Noise

As described in Chapter 19, "Mitigation," construction of the Proposed Development could result in significant adverse impacts at eight existing residential and/or mixed-use buildings in the immediate area, as well as one open space location (Grand Ferry Park). While the Applicant's commitment to provide substantial noise control measures would reduce the level of impacts, it would not fully avoid the identified significant adverse impacts. Even after accounting for possible mitigation measures intended to reduce construction noise, given the proximity of existing sensitive receptors to the Proposed Development Site, any development (such as the Proposed Actions and No-Action Alternative) involving below-grade excavation and multi-year construction would likely have the potential to create temporary significant adverse construction noise impacts. Furthermore, all significant adverse construction noise impacts at these nearby receptors could not be reasonably or feasibly fully mitigated. In order to fully avoid construction noise impacts at these nearby sensitive receptors, no construction of structure(s) of a size sufficient to accommodate the residential (including affordable housing), community facility, commercial, and public waterfront open spaces uses could occur on the Proposed Development Site. Therefore, no reasonable alternative could be developed to completely avoid significant adverse construction noise impacts without substantially compromising the Proposed Actions' stated goals.