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 the redevelopment of a 115,244-sf lot in the South Williamsburg neighborhood of Brooklyn Community District (CD) 2 with an approximately 684,242 gsf (576,220 zsf) mixed-use commercial building (the "Proposed Project"). The Proposed Project would be located on an irregularly-shaped, waterfront property and corner lot (Block 2023, Lot 10; the "Project Site") bound by Wallabout Channel to the west, Division Avenue to the north, Kent Avenue to the east, and the Brooklyn Navy Yard's Nassau Gas Works site to the south.

Under the reasonable worst-case development scenario (RWCDS), the Proposed Project would be constructed pursuant to the proposed zoning map amendment, Bulk Modifications on Waterfront Block Special Permit, Public Parking Garage Special Permit, Waterfront Zoning Certification. Under the RWCDS the Proposed Action is expected to result in a net increase of +540,442 gsf of commercial office space, +21,233 gsf of retail space, and +49,453 sf of waterfront public open space, as well as a net decreases of −181,401 gsf of warehouse space and -45 parking spaces.

This chapter considers two alternatives to the Proposed Project: (1) a No-Action Alternative, which contemplates a new as-of-right development anticipated to be developed pursuant to existing M3-1 zoning; and (2) a No Significant Adverse Impacts Alternative, which considers a development scenario that would not result in any identified significant adverse impacts.

B. PRINCIPAL CONCLUSIONS

No-Action Alternative

The No-Action Alternative examines future conditions on the Project Site, but assumes the absence of the Proposed Project (i.e., none of the discretionary and non-discretionary approvals proposed as part of the Proposed Project would be adopted). Under the No-Action Alternative by 2026, it is anticipated that an as-of-right office and warehouse development would be constructed on the Project Site pursuant to the existing M3-1 zoning. The M3-1 zoning district permits 2.0 FAR with a maximum base height of 60 feet or four stories (whichever is less) and a maximum building height of 60 feet. The No-Action development would be an approximately 312,599-gsf building, including 58,000 gsf of office space, 181,401 gsf of warehouse space, and 73,198 gsf of accessory parking. In terms of zoning floor area, it would have 57,622 zsf of office

space and 172,866 zsf of warehouse space. As the No-Action development would predominantly have warehouse uses (Use Group 16d), the Project Site would be exempt from waterfront public access area and visual corridor requirements. The Project Site would provide 279 accessory parking spaces on the first and mezzanine floors, meeting the minimum requirement that the site provide one space per 300 zsf of office space and one space per 2,000 zsf of warehouse space. 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 and construction anticipated for the Proposed Project 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, as intended by the Applicant, would not be realized under this alternative, and the No-Action Alternative would fall short of the objectives of the Proposed Project.

No Significant Adverse Impacts Alternative

The No Significant Adverse Impacts Alternative examines a scenario in which the density and other components of the Proposed Project are changed specifically to avoid the significant adverse impacts associated with the Proposed Project. As presented in **Chapter 12, "Transportation,"** there is the potential for the Proposed Project to result in significant adverse impacts related to transportation (traffic and pedestrians), during both construction and operational conditions. Overall, in order to eliminate all significant adverse impacts, the Proposed Project would have to be modified to a point where the principal goals and objectives would not be realized.

C. NO-ACTION ALTERNATIVE

The No-Action Alternative assumes that the Proposed Project is not implemented. This includes no zoning map amendment, special permits, waterfront zoning authorization, and waterfront zoning certification. 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 Project. The No-Action Alternative incorporates known development projects in the surrounding area that are likely to be built by the analysis year of 2026.

Under the No-Action Alternative, it is anticipated that an as-of-right office and warehouse building would be constructed on the Project Site pursuant to the existing M3-1 zoning under future No-Action conditions. The M3-1 zoning district permits 2.0 FAR with a maximum base height of 60 feet or four stories (whichever is less) and a maximum building height of 60 feet. As described above, the No-Action development would be an approximately 312,599-gsf building, including 58,000 gsf of office space, 181,401 gsf of warehouse space, and 73,198 gsf of accessory parking. As the No-Action development would predominantly have warehouse uses (Use Group 16d), the Project Site would be exempt from waterfront public access area and visual corridor requirements. The Project Site would provide 279 accessory parking spaces on the first and mezzanine floors, pursuant to M3-1 zoning requirements.

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

Land Use, Zoning, and Public Policy

Under the No-Action Alternative, it is anticipated that a new office and warehouse development would be constructed on the Project Site pursuant to existing zoning. The No-Action development would introduce new office and manufacturing uses on an underutilized vacant site. Approximately 58,000 gsf of office space, 181,401 gsf of warehouse space, and 73,198 gsf of accessory parking would be developed, as described above. As such, the No-Action Alternative would result in a change of land use on the Project Site.

No changes to zoning or public policy are anticipated to the Project Site 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.

It is the Applicant's opinion that unlike the Proposed Project, the No-Action Alternative would not improve land use conditions in the study area by expanding commercial opportunities and introducing local retail and office uses to the area, relative to what is currently allowed as-of-right, nor would it provide new waterfront public open space. Further, the Applicant believes that the pedestrian experience would not be enhanced with active retail or publicly accessible waterfront space uses. In addition, the Applicant believes that the No-Action Alternative would be less supportive of public policies articulated in *New York Works* and *OneNYC* that aim to increase job generation and walk-to-work opportunities, as well as objectives and goals of the *Williamsburg Waterfront 197-a Plan* and *Brooklyn Navy Yard IBZ.*

While the Applicant believes that the No-Action Alternative does not achieve the beneficial land use changes that would result with the Proposed Project, neither the Proposed Project 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."**

Socioeconomic Conditions

Neither the No-Action Alternative nor the Proposed Project would be expected to have a significant adverse impact on socioeconomic conditions. Similar to the Proposed Project, the No-Action Alternative would not result in direct residential or business displacement.

New commercial developments are anticipated in the socioeconomic conditions study area in both the future with the Proposed Project and under the No-Action Alternative, and demand for commercial development in South Williamsburg is expected to continue to rise. Unlike the Proposed Project, under the No-Action Alternative, the Project Site would be mostly occupied by manufacturing uses. As a result, the benefits of the Proposed Project, which are expected to help fortify the existing customer base and strengthen the local economy by generating new employment and opportunities, as well as create new retail opportunities to meet the needs of local workers, residents, and visitors, would not be realized under the No-Action Alternative as described in **Chapter 3, "Socioeconomic Conditions."**

Open Space

Under the No-Action Alternative, a new four-story office and manufacturing building would be developed on the Project Site. Approximately 485 workers would be introduced to the area because of the as-of-right development on the Project Site and surrounding No-Action developments. Similar to existing conditions, the passive open space ratios under the No-Action alternative would remain well above the City's optimal planning guidelines. However, unlike the Proposed Project, the No-Action Alternative would not result in the creation of a new publicly accessible waterfront open space.

Shadows/Natural Resources

Under the No-Action Alternative, a mixed-use, warehouse and office development would occupy the Project Site. The existing M3-1 zoning district permits 2.0 FAR with a maximum base and building height of 60 feet. With the Proposed Project extending up to a maximum height of 392 feet (inclusive of mechanical bulkhead), the longest shadow cast would extend approximately 1,686 feet and, as such, would have the potential to reach 12 sunlight-sensitive open space resources and one sunlight-sensitive natural resource. Of these, four sunlight-sensitive open space resources and one natural resource would receive incremental shadow coverage due to the Proposed Project. As concluded in **Chapter 5, "Shadows,"** these project-generated shadows would not affect the utilization, enjoyment, or character of these resources or have any adverse impacts on the aquatic biota in the East River. Certain resource areas would be cast in shadow under the No-Action Alternative that would not be cast in shadow under the Proposed Project. However, these shadows would be limited to small portions of these sunlight-sensitive resources and, like the Proposed Project, would not substantially affect or impact these resources. Therefore, no significant adverse impacts would occur under the No-Action Alternative.

Historic and Cultural Resources

As described in **Chapter 6, "Historic and Cultural Resources,"** the Project Site is considered potentially sensitive to archaeological resources and is not considered to be sensitive to architectural resources.

The No-Action Alternative, like the Proposed Project, is site-specific and the Project Site does not contain any designated or eligible historic resources. Therefore, the No-Action Alternative would not result in any direct impacts to historic architectural resources.

Furthermore, the No-Action Alternative, like the Proposed Project would not result in significant adverse indirect impacts on historic architectural resources. Though views of the No-Action Alternative would be visible from the S/NR-listed BNY Historic District, it would not result in adverse contextual impacts to the district as to affect characteristics that make it eligible for listing on the S/NR. Additionally, there are no historic resources located within 90 feet of the Project Site nor are there historic resources within the vicinity that contain sunlight-sensitive architectural features. Therefore, the No-Action Alternative would also not result in significant adverse construction-related and shadows impacts to historic resources.

The No-Action Alternative would include one cellar level to a depth of approximately 0 feet North American Vertical Datum of 1988 (NAVD 88), although the base of the new cellar floor, the new

building pilings, pile caps, and other foundation elements would extend considerably deeper. Excavation under the No-Action Alternative would be deeper than under With-Action conditions though the footprint of excavation and soil disturbance for the No-Action Alternative as compared to the Proposed Action would differ.

As discussed in **Chapter 6**, under With-Action conditions an LPC-approved Restrictive Declaration (RD) would be recorded against the site mandating measures to clarify the potential for the presence of archaeological resources and to avoid significant adverse archaeology impacts. As the No-Action Alternative is an as-of-right development in which the requested discretionary approvals have not been adopted, there would be no RD in place. Accordingly, under No-Action Alternative, potential archaeological resources that may exist on the Project Site could be disturbed or destroyed by due to excavations for foundations and footings of the proposed buildings.

Urban Design and Visual Resources

As under future conditions with the Proposed Project, no significant adverse impacts to urban design and visual resources would occur in the No-Action Alternative. Under the No-Action Alternative, the Project Site would provide increased foot traffic and a new building on the currently vacant site. However, there would not be any local retail or a publicly accessible waterfront area under the No-Action condition.

The Applicant's opinion is that the No-Action Alternative would not provide the same urban design and visual resources benefits associated with the Proposed Action – including public access to the waterfront that would help to enhance the pedestrian experience and provide physical and visual connectivity to the waterfront. Unlike the With-Action condition, the No Action Alternative would not be required to provide an unobstructed visual corridor along the southern edge of the Project Site nor would it offer waterfront public access from adjoining public streets and the new shore public walkway being constructed on the site to the north at 470 Kent Avenue and which could connect with a future shore public walkway on the Brooklyn Navy Yard to the south. As such the potential for a continuous shore public walkway extending from the Brooklyn Navy Yard to the South Williamsburg waterfront would be unrealized under the No-Action Alternative.

Hazardous Materials

As under the Proposed Project, the No-Action Alternative would not result in significant adverse hazardous materials impacts. It is anticipated that construction related to the No-Action Alternative would involve "intrusive work," including soil and groundwater disturbance. In accordance with the Project Site's SMP, it is expected that the NYSDEC would be contacted and a Monitoring Plan would be drafted. It is expected that these guidelines would be followed under the No-Action Alternative.

Water and Sewer Infrastructure

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

Energy

Neither the Proposed Project nor the No-Action Alternative would result in significant adverse impacts with respect to the transmission or generation of energy. The demand generated under the No-Action Alternative relative to New York City's forecasted future total annual energy demand would be slightly less (0.07 percent) than that of the Proposed Project (0.1 percent).

Transportation

As discussed below, unlike the Proposed Action, the No-Action Alternative would not result in any significant adverse impacts with respect to transportation. Unlike the Proposed Action, the No-Action Alternative would not result in the potential for significant adverse traffic impacts to three lane groups at two analyzed intersections in the weekday PM peak hour. Furthermore, the Proposed Action's significant adverse pedestrian impacts to one analyzed crosswalk and one analyzed corner area in the PM peak hour and one analyzed sidewalk in the weekday midday and PM peak hours would not occur with the No-Action Alternative.

In the No-Action Alternative, traffic, transit, pedestrian and parking demand in the study area would increase as a result of background growth, the anticipated development on the Project Site pursuant to existing zoning, i.e., on an as-of-right basis, and other development projects likely to occur within and in the vicinity of the Project Area.

Traffic

Independent of the Proposed Action, 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 one analyzed signalized intersection would have at least one congested lane group in one or more peak hours; this is compared with a total of four analyzed signalized intersections with at least one congested lane group in one or more peak hours under the Proposed Action. There would be no intersections with significant adverse traffic impacts under the No-Action Alternative compared with two in the PM peak hour under the Proposed Action.

Transit

Subway

Under the No-Action Alternative, the analyzed subway station, Marcy Avenue (J, M, Z), 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, escalators and fare arrays) at any of these stations would experience significant adverse impacts under this alternative. Therefore, like the Proposed Action, the No-Action Alternative would not result in significant adverse impacts to the analyzed subway stations. As discussed in **Chapter 12**, an analysis of subway line haul conditions is not warranted for the Proposed Action, as impacts are not expected, which is also the case for the No-Action Alternative.

Bus

Under the No-Action Alternative, demands on the local bus services operating in the vicinity of the Project Area are expected to increase compared with existing ridership as a result of background growth and new development. However, the analyzed B62 and B67 routes are expected to continue to operate with available capacity in each direction during both the weekday AM and PM peak hours under this alternative. Therefore, like the Proposed Action, the No-Action Alternative would not result in significant adverse bus 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 acceptable LOS C or better in all peak hours with the exception of the south sidewalk on Division Avenue between Wythe Avenue and Bedford Avenue which would operate at LOS D during the weekday PM peak hour. This compares to adverse impacts at one analyzed sidewalk in the midday and PM peak hours as a result of the Proposed Action, which would not occur under the No-Action Alternative.

Crosswalks

Under the No-Action Alternative, all analyzed crosswalks are expected to operate at an acceptable LOS B or better in all peak hours. The Proposed Action's significant adverse impact to one analyzed crosswalk in the PM peak hour would not occur under this alternative.

Corners

Under the No-Action Alternative all analyzed corner areas are expected to operate at a LOS B or better in all peak hours. The Proposed Action's significant adverse impact to one analyzed corner in the PM peak hour would not occur under this alternative.

PARKING

Under the No-Action Alternative, it is anticipated that demand for both off-street and on-street parking would increase due to new development and general background growth. On-site accessory parking under this alternative would total approximately 279 spaces compared to 234 under the Proposed Action.

With the provision of on-site parking, shortfalls in off-street public parking capacity are not expected under the Proposed Action. Under the No-Action Alternative, given the magnitude of available alternative modes of transportation and furthermore the provision of accessory parking required under zoning for as-of-right development, like the Proposed Action, the No-Action Alternative is not expected to result in a significant adverse parking shortfall.

Air Quality

Under the No-Action Alternative, the Project Site would be redeveloped with a 312,599-gsf, 74-foot tall (roof height) development with a 279-space accessory parking garage in the building. As such there would be a new source of stationary source air quality emissions and a new emissions source from the parking garage on the Project Site. As the building would be shorter than the 352-foot tall (roof height) With-Action building and the size of the accessory parking garage would be larger in the No-Action condition than in the Proposed Project, the No-Action condition may result in different emission conditions than the Proposed Project. However, the potential for significant adverse impacts in this scenario has not been evaluated as such development is allowed as-of-right and not subject to CEQR review and as such presumptively would not result in significant adverse impacts under CEQR.

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 14, "Air Quality,"** no exceedances of the National Ambient Air Quality Standards (NAAQS) would occur and the Proposed Project's combustion systems would not cause any significant adverse air quality impacts under the With-Action Condition. As the No-Action Alternative would result in less mobile source emissions (i.e., less incremental vehicle trips) than the Proposed Project, significant adverse impacts are unlikely under the No-Action Alternative.

Greenhouse Gas Emissions and Climate Change

As the No-Action Alternative would result in a new office and warehouse building that would be smaller than the Proposed Project, it would use less energy than the Proposed Project and would result in fewer carbon dioxide equivalent (CO_2e) emissions per year. Neither the Proposed Project nor the No-Action Alternative would result in significant greenhouse gas (GHG) emission or climate change impacts.

Noise

As with the Proposed Action, there would be no significant adverse noise impacts with operation of the No-Action Alternative, as neither would generate sufficient traffic to cause a significant mobile source noise impact.

Public Health

Similar to the Proposed Project, the No-Action Alternative would not result in any 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 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

As with the Proposed Action, the No-Action Alternative would not result in any significant adverse neighborhood character impacts. According to the *CEQR Technical Manual*, a proposed action could have a significant adverse neighborhood character impact if it would have the potential to affect the defining features of the neighborhood, either through the potential for a significant adverse impact in any relevant technical area, or through a combination of moderate effects in those technical areas. The Proposed Action would not result in any significant adverse impacts to land use, zoning, and public policy; socioeconomic conditions; historic and cultural resources; urban design and visual resources; or noise. As discussed in **Chapter 17, "Neighborhood Character,"** although significant adverse impacts would occur with respect to transportation, these impacts would not result in significant adverse impacts to neighborhood character as they would not affect any defining feature of neighborhood character, nor would a combination of moderately adverse effects affect such a defining feature.

New development that could occur on the Project Site under the No-Action Alternative would be limited to warehouse and office uses. Unlike the Proposed Action, the No-Action Alternative would not have the addition of waterfront public open space that would be beneficial to neighborhood character by providing amenities to a neighborhood workers and residents.

Construction

As discussed above, the No-Action Alternative would result in a new as-of-right office and warehouse building on the Project Site and, therefore would result in temporary increases in construction worker demand on the transportation network of the surrounding area, and new sources of construction-related air quality or noise emissions. As compared to the Proposed Project, the No-Action Alternative would result in a shorter overall construction schedule and would have less construction noise and less on-site construction equipment and construction-related traffic generating emissions. As with the Proposed Action, the construction effects of the No-Action Alternative would be short-term in duration as defined in the *CEQR Technical Manual*, i.e., less than two years, and would not result in significant adverse impacts.

D. NO SIGNIFICANT ADVERSE IMPACT ALTERNATIVE

According to the *CEQR Technical Manual*, when a project would result in significant adverse impacts, it is often CEQR practice to include an assessment of an alternative to the project that would result in no significant adverse impacts. Based on the analyses presented in other chapters of this EIS, there is the potential for the Proposed Project to result in unmitigated significant adverse impacts with respect to transportation (traffic and pedestrians). This alternative identifies those measures that would have to be taken to eliminate all of the Proposed Project's 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 area may occur. The analysis found that the density of this alternative must be substantially less than with the Proposed Project. This alternative would have similar or lesser effects on the CEQR technical areas analyzed in the

EIS relative to the Proposed Project, but unlike the Proposed Project, this alternative would avoid all identified significant adverse impacts. However, as outlined below, to eliminate all significant adverse impacts, the Proposed Project would have to be modified to a point where its principal goals and objectives would not be realized.

Transportation

Traffic

As discussed in **Chapter 12, "Transportation,"** the Proposed Project would result in significant adverse traffic impacts at two intersections and significant adverse pedestrian impacts at one crosswalk, one corner area, and one sidewalk. Implementation of traffic engineering improvements such as signal timing changes, lane restriping, and crosswalk widening would fully mitigate the significant adverse traffic impacts and the significant adverse pedestrian impact at the affected crosswalk. For the impacted sidewalk, standard mitigation typically includes relocating or removing street furniture or other impediments to pedestrian flow and sidewalk widening. As the impacted sidewalk and corner area are not under the control of the Applicant, these significant adverse pedestrian impacts would remain unmitigated if NYC DOT does not implement such measures.

Assessment

In order to eliminate the significant adverse transportation impacts that would occur with the Proposed Action, the Proposed Project's program must be reduced by approximately 75 percent, resulting in a development program for the No Significant Adverse Impacts Alternative of approximately 149,611 gsf of office and 5,308 gsf of local retail space. Such a development program would have a built FAR of less than 0.5 and as such would be allowed as-of-right under the site's existing zoning and therefore not subject to environmental review. However, this development would be subject to the same waterfront zoning requirements for the provision of waterfront public open space as the Proposed Project. While this building program would not result in any significant adverse impacts, it would not fulfill the objectives of the Proposed Action to create a substantial amount of new office and retail space at a scale that would warrant investment in site improvements including the provision of waterfront public open space and provide a range of other benefits for the applicant, surrounding neighborhood, and the City.