Chapter 21: Alternatives

A. INTRODUCTION

Consistent with City Environmental Quality Review (CEQR) requirements, this chapter examines alternatives to the Proposed Project. CEQR requires the examination of a No Action Alternative, in which a proposed project would not be undertaken. CEQR also recommends the examination of alternatives that would have no unmitigated significant adverse impacts, if unmitigated significant adverse impacts are predicted for a proposed project. Therefore, the alternatives examined in this chapter are the No Action Alternative and the No Unmitigated Significant Impacts Alternative.

This analysis first examines the No Action Alternative, which describes the conditions that would exist if the Proposed Project were not implemented. The second alternative examined is the No Unmitigated Significant Impacts Alternative, which considers the level of development that would be necessary to avoid all of the potential unmitigated impacts associated with the Proposed Project.

In addition to a comparative impact analysis, the alternatives in this chapter are assessed to determine to what extent they would meet the goals and objectives of the Proposed Project, which include: 1) converting the large, vacant Armory to productive uses that are aligned with the community's vision for the Project Site; 2) creating much needed permanently affordable housing on the National Guard Site; 3) creating new employment, learning, recreational, light industrial, and entertainment opportunities; and 4) creating economic and fiscal benefits to the City in the form of economic revitalization, increased employment opportunities, and tax revenue (see Chapter 1, "Project Description").

PRINCIPAL CONCLUSIONS

The conclusion of the alternatives analysis is that the No Action Alternative and the No Unmitigated Significant Impacts Alternative would not substantively meet the goals and objectives of the Proposed Project. Each of the alternatives is summarized briefly below, followed by a more detailed analysis in the following sections.

NO ACTION ALTERNATIVE

The No Action Alternative is the "future without the Proposed Project," or "No Action condition," described in Chapter 1, "Project Description," and analyzed in Chapters 2 through 20. The No Action Alternative assumes that the Armory would not be redeveloped, but rather would remain in its current vacant condition and the National Guard would not relocate and would continue operations within the two buildings on the National Guard Site. This alternative would avoid the Proposed Project's significant adverse impacts relating to transportation (traffic, transit, and pedestrians), air quality, noise, and construction noise. However, under this alternative, the Armory would remain

vacant, could deteriorate, and its condition could worsen. The Armory would not be cleaned, repaired, or adaptively reused with new active programming in the No Action Alternative, and the appearance and condition of the building as an architectural resource would not be improved. The existing two National Guard buildings would remain on the Project Site and in use by the National Guard; the National Guard Site would not be redeveloped with new housing. With the No Action Alternative, the reuse and redevelopment of the Project Site would not occur and the Project Site would remain underutilized, which would not contribute to the revitalization of the Kingsbridge Heights neighborhood and the City more broadly. Overall, the No Action Alternative would fail to meet the goals and objectives of the Proposed Project and the Vision Plan.

NO UNMITIGATED SIGNIFICANT IMPACTS ALTERNATIVE

The No Unmitigated Significant Impacts Alternative explores modifications to the proposed project that would avoid the unmitigated significant impacts related to transportation (traffic, transit, and pedestrians), air quality, and construction noise. These modifications include not redeveloping the Project Site or eliminating events from the Proposed Project's program, or reducing the maximum capacity of events. To eliminate all unmitigated significant adverse impacts, the Proposed Project would in some cases have to be modified to a point that its principal goals and objectives would not be realized, and in other cases the modifications would result in an alternative that would be less successful than the Proposed Project at achieving the principal goals and objectives.

B. NO ACTION ALTERNATIVE

DESCRIPTION

The No Action Alternative has been discussed as the "future without the Proposed Project" in the technical chapters of this EIS. The No Action Alternative assumes that the Armory would not be adaptively reused, but rather would remain in its current vacant condition. The No Action Alternative also assumes that the National Guard buildings would remain in use by the National Guard and the National Guard Site would not be redeveloped with a new residential building with 500 new, permanently affordable dwelling units (DUs). In addition, the No Action Alternative would not create approximately 64,800 square feet (sf) of new publicly accessible open space on the Project Site. The No Action Alternative would not require the disposition of City-owned land, a zoning map amendment to rezone the project block to M1-4A/R7-2 (MX) to allow manufacturing uses, a zoning text amendment and special permit to allow an increase in permitted indoor arena capacity of up to 17,000 persons and permit modifications to signage requirements, and a special permit to allow a public parking garage with capacity greater than 150 parking spaces. With the No Action Alternative, the Project Site would remain underutilized, which would not contribute to the revitalization of the Kingsbridge Heights neighborhood or the City more broadly. Conditions resulting from the No Action Alternative as compared with the Proposed Project are summarized below.

LAND USE, ZONING, AND PUBLIC POLICY

In the No Action Alternative, the Project Site would remain in its current condition, with the Armory remaining vacant and the National Guard would not relocate and would

continue operations within the two office buildings. The Armory would not be adaptively reused with a mix of community facility and cultural space, light manufacturing space, commercial office space, a 17,000-person capacity live event venue, and other entertainment uses within the envelope of the existing structure under the No Action Alternative. Under the No Action Alternative, the National Guard functions would not be relocated, and the National Guard Site would not be redeveloped with a new residential building with 500 permanently affordable DUs or ground floor commercial retail space.

The No Action Alternative, unlike the Proposed Project, would not facilitate development on the Project Site that would be compatible with surrounding land uses, consistent with zoning in the Kingsbridge Heights neighborhood, and supportive of public policies that address economic development, affordable housing, and open space. Instead, the Armory Site would remain vacant and underutilized.

Under the No Action Alternative, no changes to zoning are anticipated for the Project Site. Unlike the Proposed Project, the No Action Alternative would not facilitate development patterns that meet the vision plan set forth by the community in the *Together for Kingsbridge Vision Plan*. The No Action Alternative also would not create 500 new, permanently affordable DUs on the National Guard Site and would not support the development of new jobs in a neighborhood with strong public transit access. Further unlike the Proposed Project, the No Action Alternative would not further City-wide planning goals and promote new development on an otherwise underutilized site for public enjoyment with commercial and recreational uses.

Neither the Proposed Project nor the No Action Alternative would result in significant adverse impacts to land use, zoning, or public policy, but only the Proposed Project would renovate and adaptively reuse the Armory, create new permanently affordable DUs, facilitate development on the Project Site that would be compatible with surrounding land uses, consistent with zoning in the Kingsbridge Heights neighborhood, and support public policies that address economic development, housing, and open space.

SOCIOECONOMIC CONDITIONS

Neither the No Action Alternative nor the Proposed Project would result in significant adverse impacts due to changes in socioeconomic conditions. The following describes the effects of the No Action Alternative as compared with those anticipated to occur with the Proposed Project for each CEQR area of socioeconomic concern.

DIRECT RESIDENTIAL DISPLACEMENT

Like the Proposed Project, the No Action Alternative would not directly displace any residents from the Project Site.

DIRECT BUSINESS DISPLACEMENT

With the No Action Alternative, the Armory would remain vacant and the two buildings on the National Guard Site would remain in use by the National Guard. Unlike the Proposed Project, with the No Action Alternative, the National Guard would not relocate from the Project Site. However, as was concluded in the socioeconomic assessment, the Proposed Project would not result in any significant adverse impacts due to direct

business displacement. In the No Action Alternative, the Armory would remain vacant, underutilized, and inaccessible to the public.

INDIRECT RESIDENTIAL DISPLACEMENT

Neither the Proposed Project nor the No Action Alternative would result in significant adverse impacts due to indirect residential displacement. However, unlike the Proposed Project, with the No Action Alternative, a new residential building would not be constructed on the Project Site and the No Action Alternative would not provide 500 new permanently affordable DUs and thus would not further the City's goal of increasing affordable housing.

INDIRECT BUSINESS DISPLACEMENT

Under the No Action Alternative, there would be no change in existing conditions on the Project Site. Unlike the Proposed Project, in the No Action Alternative, the Armory would not be adaptively reused. However, while the Proposed Project would redevelop the Project Site with a mix of community facility, light manufacturing, and commercial and entertainment uses, it would not introduce new economic activities that would substantially alter existing economic patterns within the study area, nor would it alter the land use character of the study area. The study area has well-established residential and retail markets such that the Proposed Project would not substantially alter commercial real estate trends in the area. Therefore, neither the No Action Alternative nor Proposed Project would result in significant adverse impacts due to indirect business displacement.

ADVERSE EFFECTS ON SPECIFIC INDUSTRIES

Neither the No Action Alternative nor the Proposed Project would significantly affect the business conditions in any industry or any category of business within or outside the study area. Under the No Action Alternative, the Armory would remain undeveloped and the two buildings on the National Guard Site would remain in use by the National Guard. The relocation of the National Guard under the Proposed Project would be voluntary and would not result in the loss or substantial diminishment of a particularly important product or service within any specific industries. The No Action Alternative would not result in a change of existing uses and therefore would not have an adverse effect on specific industries either.

COMMUNITY FACILITIES AND SERVICES

PUBLIC SCHOOLS

Unlike the Proposed Project, the No Action Alternative would not introduce a new population. However, neither the Proposed Project nor the No Action Alternative would result in significant adverse impacts to elementary schools, intermediate schools, or high schools.

PUBLIC EARLY CHILDHOOD PROGRAMS

Unlike the Proposed Project, the No Action Alternative would not introduce a new residential population that could use early childhood programs. However, neither the No

Action Alternative nor the Proposed Project would have a significant adverse impact on public early childhood programs.

HEALTH CARE FACILITIES

Unlike the Proposed Project, the No Action Alternative would not introduce a new population. However, neither the No Action Alternative nor the Proposed Project would have a significant adverse impact on health care facilities.

POLICE AND FIRE SERVICES

Unlike the Proposed Project, the No Action Alternative would not introduce a new population. However, neither the No Action Alternative nor the Proposed Project would have a significant adverse impact on police and fire services.

OTHER COMMUNITY FACILITIES

Unlike the Proposed Project, the No Action Alternative would not result in beneficial direct effects to what the 2021 *CEQR Technical Manual* defines as "Other Community Facilities," which includes community centers or cultural facilities. The Proposed Project would result in beneficial direct effects to other community facilities, which include cultural facilities and museums, through the provision of approximately 54,200 gsf of community facility space dedicated to Community Based Organizations (CBOs) and cultural center space, and approximately 30,200 gsf of museum space in the Armory. These uses would not be created in the No Action Alternative, as the Armory would remain in its existing, vacant condition.

OPEN SPACE

Unlike the Proposed Project, with the No Action Alternative, a new residential building would not be built on the National Guard Site and approximately 64,800 sf of new, publicly accessible open space would not be created on the Project Site. With both the No Action Alternative and the Proposed Project, there would be no direct or indirect impacts on publicly accessible open space. However, in contrast to the Proposed Project, the No Action Alternative would not create any new, publicly accessible open space on the Project Site.

SHADOWS

Unlike the Proposed Project, with the No Action Alternative, a new residential building would not be built on the National Guard Site and new publicly accessible open space would not be created on the Project Site. With both the No Action Alternative and the Proposed Project, no new shadow would reach any sunlight-sensitive resources. In addition, in contrast to the No Action Alternative where no new open space would be created, the Proposed Project could not result in a significant adverse shadow impact to open space that would be developed as part of the Proposed Project, because without the Proposed Project, the Project Site open space would not be created.

HISTORIC AND CULTURAL RESOURCES

With the No Action Alternative, the Armory would remain vacant and underutilized, and thus it could deteriorate and its condition could worsen. The Armory would not be cleaned, repaired, renovated, or adaptively reused with new active uses with the No Action Alternative, and the appearance and condition of this architectural resource would not be improved as the building would remain vacant and underutilized. Unlike the Proposed Project, no new signage would be added to the existing structure and no interior or exterior alterations—including door openings, skylights, and solar panels—would be made. In addition, with the No Action Alternative, the buildings on the National Guard Site would remain and a new residential building that would be taller than the Armory would not be constructed on the National Guard Site. With the No Action Alternative, the Project Site would continue to appear underutilized with a chainlink fence at its perimeter in contrast with the approximately 64,800 sf of publicly accessible open space that would be created with the Proposed Project. While the new residential building would alter the context of the Armory, the new building would be designed to be appropriate to the context of the Armory as a historic architectural resource. Neither the Proposed Project nor the No Action Alternative would result in significant adverse impacts to historic and cultural resources.

URBAN DESIGN AND VISUAL RESOURCES

With the No Action Alternative, the Armory would remain underutilized and vacant, the National Guard buildings would remain in use, and the chain link fence at the perimeter of the Project Site would remain in contrast to the Proposed Project which would return the Armory to active uses, create new publicly accessible open space, and add a new residential building to the National Guard Site. The No Action Alternative would not activate the sidewalks adjacent to the Project Site with new pedestrian activity associated with the new development which would occur with the Proposed Project. While both the No Action Alternative and Proposed Project would not result in any significant adverse impacts to urban design and visual resources, only the Proposed Project would enhance the pedestrian experience of the Project Site. Further, neither the No Action Alternative nor the Proposed Project would adversely affect any visual resources or views to visual resources in the study area.

HAZARDOUS MATERIALS

Under the No Action Alternative, it is assumed that no remediation would occur on the Project Site, the Armory would remain vacant, the National Guard buildings would not be demolished, no new residential building would be built, and no new open space would be created. With the Proposed Project, an (E) Designation (E-850) for hazardous materials would be placed on the subject property to ensure that the Applicants complete any remediation associated with the development of the Proposed Project in accordance with the requirements of the New York City Mayor's Office of Environmental Remediation (OER). The (E) Designation could require additional hazardous materials investigations to support the preparation of a site-specific Remedial Action Work Plan (RAWP) and associated Construction Health and Safety Plan (CHASP) to the satisfaction of OER. These remedial actions, which would not be implemented through an E Designation with the No Action Alternative, would be in conformance with federal, state, and city regulatory requirements and would address both already-identified concerns and any concerns

unexpectedly encountered during construction. Neither the No Action Alternative nor the Proposed Project would result in significant adverse impacts on hazardous materials.

WATER AND SEWER INFRASTRUCTURE

Unlike the Proposed Project, the No Action Alternative would not result in any increased demand on New York City's water supply, wastewater and sanitary sewage treatment systems. Neither the Proposed Project nor the No Action Alternative would result in any significant adverse impacts on the City's water supply, wastewater or stormwater conveyance and treatment infrastructure.

SOLID WASTE AND SANITATION

Unlike the Proposed Project, the No Action Alternative would not generate additional solid waste. Neither the No Action Alternative nor the Proposed Project would result in significant adverse impacts on solid waste and sanitation services.

ENERGY

Unlike the Proposed Project, the No Action Alternative would not increase demand for electricity. However, the increase in electricity demand generated by the Proposed Project would be negligible relative to the capacity of the City's power supply and transmission systems and the current levels of demand in the Consolidated Edison New York City and Westchester County service area. Therefore, neither the No Action Alternative nor the Proposed Project would result in significant adverse impacts with respect to the transmission or generation of energy.

TRANSPORTATION

Under the No Action Alternative, the Armory would remain vacant and the two buildings on the National Guard would remain in use by the National Guard. As such, the increases in vehicle, transit, and pedestrian trips and parking demand that would occur with the Proposed Project would not occur with the No Action Alternative. The No Action Alternative would not result in the significant adverse traffic, transit, and pedestrian impacts that would occur with the Proposed Project.

AIR QUALITY

The No Action Alternative would result in fewer vehicle trips than the Proposed Project, and the maximum pollutant concentrations from mobile sources under the No Action Alternative would be lower than with the Proposed Project. Therefore, as with the Proposed Project, concentrations of carbon monoxide (CO) and fine particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) due to traffic at intersections under the No Action Alternative would not result in any violations of National Ambient Air Quality Standards (NAAQS). Unlike the Proposed Project, there would be no intersections with potential significant adverse air quality impacts from mobile sources of emissions of $PM_{2.5}$ on an annual average basis under the No Action Alternative. Therefore, the No Action Alternative would not result in significant adverse mobile source air quality impacts that would occur with the Proposed Project.

The No Action Alternative would not result in significant adverse stationary source air quality impacts as there would be no development on the Project Site. However, with the Proposed Project, restrictions prohibiting the use of fossil fuel-fired heating and hot water systems would be in place, limiting the potential for adverse stationary source emissions.

GREENHOUSE GAS EMISSIONS

Unlike the Proposed Project, the No Action Alternative would not result in an increase in energy use, fuel consumption, or vehicle trips, and would therefore not result in the greenhouse gas emissions that would result from the Proposed Project. However, to truly account for the GHG emissions would require speculation regarding where people would live in the No Action Alternative if residential units are not built at this location, and what energy use and efficiency might be like for those alternatives and other related considerations. Similar assumptions would also need to be assumed regarding commercial and other uses. Further, measures for reducing GHG emissions are included as part of the Proposed Project, and the Proposed Project would be consistent with OneNYC 2050 and City of Yes GHG emissions reduction goals including an anticipation to achieve Leadership in Energy and Environmental Design (LEED) Silver certification at a minimum.

NOISE

The No Action Alternative, unlike the Proposed Project, would result in significant adverse impacts related to noise. No new sources of noise would be created under the No Action Alternative because the Armory would remain vacant and underutilized and the National Guard buildings would remain in use as in existing conditions. Additionally, no noise-sensitive uses would be newly introduced requiring consideration of noise exposure or building attenuation.

PUBLIC HEALTH

Under the No Action Alternative, no new development would occur on the Project Site and there would be no potential for significant adverse impacts in the areas of hazardous materials, air quality, noise, or construction. The No Action Alternative is expected to avoid the significant adverse air quality impact to related to particulate matter ($PM_{2.5}$) that is projected to occur with the Proposed Project. However, with the Proposed Project, the projected exposure to the predicted exceedances of the $PM_{2.5}$ *de minimis* criterion at the affected locations would be brief, and the exceedances would not contribute to a violation of the $PM_{2.5}$ NAAQS, therefore, the exceedances of the $PM_{2.5}$ *de minimis* criterion on an annual basis would not constitute a significant adverse impact on public health. Therefore, neither the No Action Alternative nor the Proposed Project would result in a significant adverse public health impact. While the Proposed Project would have a significant adverse noise impact upon completion and during construction, neither would constitute a Public Health impact. With either the No Action Alternative or the Proposed Project, there would be no significant adverse public health impacts.

NEIGHBORHOOD CHARACTER

The No Action Alternative would not alter the current character of the Project Site as the Armory would remain vacant and no new development would occur on the National

Guard Site, with the National Guard buildings remaining in use as in existing conditions. Unlike the Proposed Project, the No Action Alternative would not adaptively reuse the Armory with new, active uses that would enhance the neighborhood character, nor would the No Action Alternative add 500 new, permanently affordable DUs to the Project Site that would provide much-needed housing to the neighborhood. The No Action Alternative also would not create new publicly accessible open space. Both the No Action Alternative and the Proposed Project would not result in any significant adverse impacts to neighborhood character, however, only the Proposed Project would facilitate development on the Project Site that would be compatible with surrounding neighborhood character, support the development of new jobs in a neighborhood with strong public transit access, and support economic development, housing, and open space. Further, the No Action Alternative would not support City-wide planning goals that promote new development on an otherwise underutilized site for public enjoyment with commercial and recreational uses. Overall, the benefits to neighborhood character that would result from the Proposed Project would not be realized under the No Action Alternative.

CONSTRUCTION

No construction would occur on the Project Site in the No Action Alternative. The Armory building would continue to be vacant and underutilized and thus it could deteriorate and its condition could worsen; the National Guard buildings would remain in use as in existing conditions.

The No Action Alternative would not result in the additional vehicle trips, traffic lane closures, or increased parking demand generated by the Proposed Project's construction activities. As such, the No Action Alternative would not result in the temporary significant adverse impacts related to construction vehicular traffic that would occur with the proposed project. The No Action Alternative also would not result in any air pollutant emissions or increased noise levels that would be associated with the construction of the Proposed Project. Neither the Proposed Project nor the No Action Alternative would result in any significant adverse impacts related to construction-period air quality. However, the No Action Alternative would avoid the significant adverse temporary construction noise impacts that would occur with the Proposed Project.

C. NO UNMITIGATED SIGNIFICANT IMPACTS ALTERNATIVE

DESCRIPTION

As discussed in Chapter 22, "Mitigation," the proposed project could result in unmitigated significant adverse impacts related to transportation (traffic, transit, and pedestrians), air quality, and construction noise. Therefore, alternatives were developed to explore modifications to the Proposed Project that would allow for the mitigation of these impacts.

TRANSPORTATION

As discussed in Chapter 13, "Transportation," significant adverse transportation-related impacts were identified for the Proposed Project. Among these, unmitigated impacts have been identified for traffic (local intersections), transit (subway station stairway and potentially subway line-haul), and pedestrians (sidewalks, corners, and crosswalks). For each of these impacted conditions, modified development programs will be further

explored between Draft and Final EIS to determine if the identified unmitigated significant adverse transportation-related impacts for traffic, transit, and pedestrians could be potentially eliminated. The sections below provide descriptions of the anticipated characteristics of the modified development programs.

TRAFFIC

The Proposed Project would result in significant adverse traffic impacts at 25 intersections within the study area. For the typical weekday AM, midday, and PM, and the Saturday midday/afternoon peak hours, it is possible that improvement measures could be identified between Draft and Final EIS to mitigate some or all of the projected impacts. However, for the weekday and Saturday evening event peak hours, due to the nature of the projected impacts, it is unlikely that many could be mitigated without a substantial reduction in the event venue's attendance capacity. Thus, any reasonable alternative that would avoid unmitigated traffic impacts would necessitate a substantial reduction or elimination of the event venue and possibly adjustments to some of the other land uses proposed for the Armory building, and would likely not satisfy the key project goals of increased on-site employment, revenue generation and fiscal benefits.

TRANSIT

The Proposed Project would result in potentially unmitigated impacts to a stairway at the Kingsbridge Road (No. 4) Station and line-haul conditions along the No. 4 and/or B/D subway lines. Since these impacts would only occur during the weekday and Saturday evening event peak hours, any reasonable alternative that would avoid unmitigated transit impacts would necessitate a substantial reduction or elimination of the event venue, a key component of the Proposed Project that is expected to help achieve a number of project goals.

PEDESTRIANS

The Proposed Project would result in significant adverse pedestrian impacts at six sidewalks, one corner, and seven crosswalks. As with traffic, it is possible that improvement measures could be identified between Draft and Final EIS to mitigate some or all of the projected impacts during the weekday AM, midday, and PM, and Saturday midday/afternoon peak hours. However, for the weekday and Saturday evening event peak hours, due to the severity of the projected impacts, it is unlikely that many could be mitigated without a substantial reduction in the event venue's attendance capacity. Thus, any reasonable alternative that would avoid unmitigated pedestrian impacts would necessitate a substantial reduction or elimination of the event venue and possibly adjustments to some of the other land uses proposed for the Armory building.

AIR QUALITY

As described in Chapter 14, "Air Quality," mobile source annual $PM_{2.5}$ increments are predicted to potentially exceed the *de minimis* criterion of 0.1 $\mu g/m^3$ for the annual averaging period at West Kingsbridge Road and Reservoir Avenue, and West 195th Street and Reservoir Avenue. Therefore, at these locations, the Proposed Project would result in a significant adverse mobile source air quality impact. Between the DEIS and FEIS, additional review and evaluation will be performed, which is expected to determine

that the identified significant adverse impact related to the mobile source annual $PM_{2.5}$ increments will be avoided. The additional review is expected to include a more refined microscale analysis which incorporates all of the traffic peak periods and accounts for the relative frequency of events that would take place. If required, additional modeling of $PM_{2.5}$ concentrations (Grid Analysis) will be performed using more refined or comprehensive analysis procedures to determine the magnitude and extent of neighborhood-scale $PM_{2.5}$ impacts from mobile sources. It is expected that these additional measures will reduce $PM_{2.5}$ concentrations below the annual *de minimis* criterion threshold. If unmitigated air quality impacts remain, the FEIS will assess the levels of traffic associated with a reduced development that would not result in unmitigated significant adverse air quality impacts.

CONSTRUCTION NOISE

Construction activity for the Proposed Project is expected to follow the requirements of the NYC Noise Control Code. However, the implementation of these measures, would not eliminate the identified temporary significant adverse construction noise impacts predicted to occur during hours when the loudest pieces of construction equipment are in use. In order to completely avoid significant adverse construction noise impacts, project-generated construction would have to be restricted in such a manner so as to occur neither on the same block nor within one block of any noise receptors, which would require avoidance of construction at the Project Site. This would severely limit achievable development and the Proposed Project's goals and objectives. Therefore, no reasonable alternative could be developed to avoid the temporary unmitigated construction-period noise impact without substantially compromising the Proposed Project's stated goals. ✴