

A. INTRODUCTION

This chapter considers alternatives to the proposed project. The purpose of an analysis of alternatives, as set forth in the 2014 *City Environmental Quality Review (CEQR) Technical Manual*, is to provide the decision makers with the opportunity to consider practicable alternatives that are consistent with the goals and objectives of the project sponsor and that could potentially reduce or eliminate significant adverse environmental impacts identified in the Environmental Impact Statement (EIS).

This chapter considers the following alternative, which is described in greater detail below:

- A No Action Alternative, which is mandated by the State Environmental Quality Review Act (SEQRA) and CEQR, and is intended to provide the lead and involved agencies with an assessment of the consequences of not selecting the proposed actions. In this case, the special permit would not be granted and the amendment to the City Map to demap portions of Garrick Street, Amador Street, and Albany Avenue, and Morrow Street (unbuilt streets), and to map new sections of Morrow Street and realign the intersection of Morrow Street and Forest Avenue would not be made. In the No Action Alternative (also known throughout the document as the “Future without the Proposed Project” and described in each of the analysis chapters of this EIS), the project site would be redeveloped with a commercial center which would not require any discretionary approvals, including the mapping or demapping of any City streets. The No Action Alternative would be similar to the proposed project, and would total approximately 228,250 gross square feet (gsf) of commercial space, with 736 parking spaces.

All significant adverse impacts identified for the proposed project would not occur in the No Action Alternative. As discussed throughout the EIS, the proposed project (as compared to the No Action scenario) would not result in any unmitigated significant adverse impacts. While there would be the potential for significant adverse traffic impacts, locations where significant adverse traffic impacts are predicted to occur could be fully mitigated with the implementation of standard traffic mitigation measures (e.g., signal timing changes and lane restriping), which are described in Chapter 13, “Mitigation.” Therefore, an alternative that would reduce or eliminate unmitigated significant adverse impacts is not warranted.

PRINCIPAL CONCLUSIONS*NO ACTION ALTERNATIVE*

The No Action Alternative is the “Future without the Proposed Project” described in each of the analysis chapters of this EIS. Under the No Action Alternative, the project site would be redeveloped with a commercial center that would not require any discretionary approvals, including the mapping or demapping of any City streets. The No Action Alternative would be

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similar to the proposed project, and would total approximately 228,250 gross square feet (gsf) of commercial space, with 736 parking spaces. The No Action Alternative would also preserve mapped wetlands areas on the project site and provide the landscaped buffer between the commercial center and the regulated wetland areas, as well as a stormwater management area, in accordance with the site plan approved by the New York State Department of Environmental Conservation (NYSDEC). However, the No Action Alternative would not include a wholesale warehouse establishment and supermarket, and would not provide a realigned intersection at Morrow Street and Forest Avenue. Therefore, unlike the proposed project, the No Action Alternative would not provide large-scale commercial uses that the applicant believes respond to the demand in the surrounding area or provide efficient access to the project site and circulation within the project site. Similarly, the No Action Alternative would not include the demapping of unbuilt mapped streets located over sensitive wetland areas, and therefore would not rationalize the street network in this area. The significant adverse impacts related to traffic that would occur with the proposed project (which could be fully mitigated) would not occur with the No Action Alternative. However, unlike the proposed project, in the No Action Alternative, ground-disturbing construction activities could be conducted without the completion of archeological investigations to confirm the presence or absence of archaeological resources on the project site. Therefore, unlike the proposed project, the No Action Alternative has the potential to impact archaeological resources if such resources are present. Similarly, the No Action Alternative would not have the benefit of additional protections and review as there would be no requirement for subsurface testing or implementation of a Remedial Action Plan (RAP) and associated Construction Health and Safety Plan (CHASP).

B. NO ACTION ALTERNATIVE

Throughout the earlier chapters of this EIS, the No Action Alternative is considered under the future without the proposed project as the baseline for determining impacts. Under the No Action Alternative, the development site is assumed to be developed with a commercial center that would not require any discretionary approvals, including the mapping or demapping of any City streets. As with the proposed project, the No Action Alternative would conform with the NYSDEC-approved site plan, and would preserve mapped wetland areas on the project site and provide a landscaped buffer between the retail center and the regulated wetland areas, as well as a stormwater management area. The No Action Alternative would total approximately 228,250 gross square feet (gsf) in six one- or two-story buildings. Uses would include retail and/or office space, a toy store, a pet store, a sporting goods store, a shoe store, a liquor store, a gas station, and an automated bank teller. The No Action Alternative could attract smaller retailers and commercial tenants, and other neighborhood services, but larger uses, such as a supermarket and wholesale warehouse, would not be permitted as these uses (i.e., Use Group 6 or 10A spaces greater than 10,000 zoning square feet [zsf]) would require a special permit. To fulfill the accessory parking requirements of the retail space, the No Action Alternative would also include a total of 736 parking spaces, located in a parking lot on the northern portion of the development site.

Conditions with the No Action Alternative as compared to the future with the proposed project are summarized below.

LAND USE, ZONING, AND PUBLIC POLICY

The No Action Alternative would be largely similar to the proposed project, and would introduce a similar retail center on the development site while preserving mapped wetland areas and providing a landscaped buffer between the retail center and the regulated wetland areas, as well as a stormwater management area. As with the proposed project, the No Action Alternative would be similar to other retail facilities in the area (in particular the Home Depot facility located to the north of the project site on Forest Avenue). In addition, the No Action Alternative would conform with the existing M1-1 zoning regulations, and would not require any discretionary actions modifying zoning regulations. Similar to the proposed project, the No Action Alternative would also be consistent with applicable public policies, in particular *Working West Shore 2030*, by supporting economic development through new retail uses that provide local job opportunities, expanding commercial development along the Forest Avenue corridor, and preserving and enhancing the wetlands on the southern end of the project site (a portion of the Graniteville Swamp). Although it is located in the city's Coastal Zone, the No Action Alternative is not subject to review for consistency with the policies of the New York City Waterfront Revitalization Program (WRP). Overall, as with the proposed project, the No Action Alternative would not result in any significant adverse impacts to land use, zoning, and public policy.

However, as the No Action Alternative would not include a wholesale warehouse establishment and supermarket, it would not fully achieve the applicant's goals and objectives, which include responding to the demand in the surrounding community for these large-scale commercial uses. In addition, as the No Action Alternative would not include any mapping or demapping of City streets, it would not provide efficient access to the project site and circulation within the project site. In particular, it would not provide the realigned intersection of Morrow Street and Forest Avenue, but would instead utilize the existing alignment of Morrow Street, therefore it would not improve vehicular access to the project site as well as to the adjacent cinema or minimize conflicts at the intersection. Similarly, the No Action Alternative would not include the demapping of unbuilt mapped streets located over sensitive wetland areas, and therefore would not rationalize the street network in this area.

HISTORIC RESOURCES

As the No Action Alternative does not require any discretionary approvals, ground-disturbing construction activities could be conducted without the completion of archeological investigations to confirm the presence or absence of archaeological resources on the project site. Therefore, unlike the proposed project, the No Action Alternative has the potential to impact archaeological resources if such resources are present. With the proposed project, significant adverse impacts on archaeological resources would be avoided with the completion of a Phase 1B investigation, and any subsequent archaeological investigations as necessary (e.g., a Phase 2 Archaeological Survey or a Phase 3 Data Recovery), all of which would be undertaken in consultation with the Landmarks Preservation Commission (LPC) and the New York State Office of Parks, Recreation, and Historic Preservation (OPRHP).

NATURAL RESOURCES

As with the proposed project, the No Action Alternative would include commercial development of a primarily vacant lot that presently contains natural resources including disturbed upland area, forested upland area, isolated freshwater wetlands, and disturbance-tolerant wildlife species

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that are ubiquitous in urban areas. However, as with the proposed project, the No Action Alternative would conform with the NYSDEC-approved site plan, and would preserve mapped wetland areas on the project site and provide a landscaped buffer between the retail center and the regulated wetland areas, as well as a stormwater management area. The No Action Alternative's effects on natural resources would be the same as with the proposed project: in particular, proper stormwater management practices and wetlands enhancements would result in an overall improvement to natural resources on site. Green infrastructure, such as the stormwater basin, would offset the potential impacts of increased impervious surface coverage, thereby decreasing stormwater runoff and benefitting water quality, freshwater wetland and wetland adjacent area values, and wildlife habitat.

The No Action Alternative includes the same freshwater wetland buffer plantings and freshwater and tidal wetland adjacent area enhancements as the proposed project, which would mitigate the loss of freshwater wetland adjacent area and would benefit wildlife, waterfowl, and songbirds. Displacement of some wildlife will occur as a result of the No Action Alternative, but the southern portion of the property, the area of highest wildlife utilization, will remain undeveloped or enhanced in some locations with native vegetative plantings that will provide food and cover for wildlife. Habitat would remain on-site directly adjacent to the No Action Alternative to support potentially displaced wildlife.

Overall, as with the proposed project, the No Action Alternative would not have any significant adverse impacts to natural resources in the area, and may improve water quality and flood protection and storage by enhancing freshwater and tidal wetland adjacent areas.

HAZARDOUS MATERIALS

In the No Action Alternative, construction of the retail center would be conducted in accordance with applicable regulatory requirements, including New York State Department of Environmental Conservation (NYSDEC) and United States Environmental Protection Agency (EPA) regulations, pertaining to any asbestos-containing material (ACM), lead-based paint, and potential PCB-containing equipment as well as requirements for proper disposal of any material transported off-site. Removal of any drums or tanks encountered during construction would be performed in accordance with applicable regulatory requirements, including NYSDEC requirements relating to spill reporting, tank registration, and waste manifesting. If dewatering were to be necessary, water would be discharged to sewers in accordance with New York City Department of Environmental Protection (DEP) requirements or otherwise in accordance with NYSDEC State Pollutant Discharge Elimination System (SPDES) requirements. However, unlike the proposed project, under the No Action Alternative there would be no requirement for subsurface testing or a Remedial Action Plan (RAP) and associated Construction Health and Safety Plan (CHASP); therefore, absent the additional measures that would be implemented with the proposed project, in the No Action Alternative there would be a greater potential for adverse impacts related to hazardous materials.

WATER AND SEWER INFRASTRUCTURE

Similar to the proposed project, the No Action Alternative is expected to include an internal sanitary sewer system to connect the commercial buildings to the existing sanitary sewer line along South Avenue, as well as an internal storm sewer system that would drain into a stormwater management area located within the preserved area on the southern portion of the project site (as required by the NYSDEC-approved site plan). The stormwater management

system would include measures to treat stormwater collected from building rooftops and parking lot area before it is discharged into the wetland area. As with the proposed project, the No Action Alternative would result in a minor increase in sanitary sewage flows to the Port Richmond Wastewater Treatment Plant (WWTP), and, with the implementation of a stormwater management system to discharge stormwater into the adjacent wetland area, would not result in any increase in stormwater flows to the City’s storm sewer system. Therefore, as with the proposed project, the water supply and sewer system in the area of the project site would be sufficient to handle the increased water demand and wastewater flow resulting from the No Action Alternative, and the No Action Alternative would not result in any significant adverse impacts to water and sewer infrastructure.

TRANSPORTATION

TRAFFIC

Traffic conditions were evaluated at 10 intersections for the weekday midday, PM, and Saturday peak hours. In 2019 the No Action Alternative would avoid the potential for the proposed project to result in significant adverse traffic impacts at four intersections in the weekday PM peak hour and at seven intersections in the Saturday peak hour. **Table 12-1** provides a summary of the locations by lane group and analysis time period where the No Action Alternative would avoid significant adverse impacts.

TRANSIT

The No Action Alternative would generate fewer peak hour bus riders than the proposed project, for which a detailed bus line-haul analysis was not warranted. As with the proposed project, the No Action Alternative would not generate enough bus trips to warrant a bus analysis, and would not be expected to result in any significant adverse bus line-haul impacts.

**Table 12-1
Significant Adverse Traffic Impacts of the Proposed Project—
Avoided with the No Action Alternative**

Intersection		Weekday PM Peak Hour	Saturday Peak Hour
EB/WB Street	NB/SB Street		
Forest Avenue	Maple Parkway		WB-L
Forest Avenue	Richmond Avenue/Morningstar Road	EB-TR	EB-L EB-TR
Forest Avenue	Union Avenue	WB-L	WB-L
Forest Avenue	Willow Road West		EB-TR
South Avenue	Amador Street		NB-TR
South Avenue	Lisk Avenue	WB-LR	WB-LR
South Avenue	Goethals Road North	WB-LTR	WB-LTR
Total Impacted Intersections/Lane Groups		4/4	7/8
Notes: L = Left Turn, T = Through, R = Right Turn, DefL = Defacto Left Turn, EB = Eastbound, WB = Westbound, NB = Northbound, SB = Southbound.			

PEDESTRIANS

The proposed project is not expected to result in any significant adverse pedestrian impacts. As with the proposed project, auto trips associated with the No Action Alternative would park on-site and would not traverse any pedestrian elements (i.e., sidewalks, corners, and crosswalks) surrounding the development site. Patrons accessing the project site via taxi would also be expected to get picked up/dropped off on-site. As a result, only the incremental bus trips would

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traverse the surrounding pedestrian elements. As noted above, the No Action Alternative would generate fewer peak hour bus riders than the proposed project, and would not avoid any pedestrian impacts associated with the proposed project.

VEHICULAR AND PEDESTRIAN SAFETY

The analysis of vehicular and pedestrian safety identified no high crash locations in the study area in the 2013 to 2016 period. As with the proposed project, the No Action Alternative would not result in significant adverse impacts related to vehicular and pedestrian safety.

PARKING

The No Action Alternative would provide 736 accessory parking spaces as compared to the proposed project with 838 accessory parking spaces. The parking provided with the No Action Alternative would meet the zoning requirement of one space per 300 zoning square feet (zsf) of general retail or office use. Therefore, all of the parking required for the commercial uses in the No Action Alternative are expected to be accommodated on-site, and, as with the proposed project, the No Action Alternative is not expected to result in the potential for a parking shortfall.

AIR QUALITY

The No Action Alternative would result in fewer vehicle trips and less mobile source pollution than the proposed project. Therefore, since no significant adverse mobile source air quality impacts are predicted due to the proposed project, neither the proposed project nor the No Action Alternative would result in a significant adverse impact related to mobile sources. The No Action Alternative would also include a parking lot with fewer spaces than the proposed project, and would result in fewer vehicles using the parking lot that could potentially affect ambient levels of pollutants at adjacent receptors. Since the proposed project's parking lot is not predicted to result in any significant adverse air quality impacts, neither the proposed project's parking lot nor the No Action Alternative's parking lot would result in a significant adverse air quality impact.

Under the No Action Alternative, the project site is expected to be redeveloped with a retail center that does not require any discretionary approvals. As the No Action Alternative would include a comparable amount of commercial space as the proposed project, stationary sources of emissions would be expected to be similar. The analysis concluded that the proposed project would not result in a significant adverse air quality impact due to stationary sources, and this conclusion would be the same in the No Action Alternative.

NOISE

Neither the No Action Alternative nor the proposed project would generate sufficient traffic to have the potential to cause a significant noise impact. As with the proposed project, the commercial buildings that would be constructed in the No Action Alternative would include acoustically rated windows and a means of alternate ventilation in order to provide the required attenuation to maintain an acceptable interior noise level for commercial use.

NEIGHBORHOOD CHARACTER

Similar to the proposed project, the No Action Alternative would not result in significant adverse neighborhood character impacts. However, the No Action Alternative would result in fewer beneficial effects to neighborhood character than the proposed project. In particular, the No Action Alternative would not include a wholesale warehouse establishment and supermarket to respond to the demand in the surrounding community for these large-scale commercial uses. In addition, the No Action Alternative would not provide efficient access to the project site and circulation within the development site; in particular, it would not provide the realigned intersection of Morrow Street and Forest Avenue, but would instead utilize the existing alignment of Morrow Street, therefore it would not improve vehicular access to the project site as well as to the adjacent cinema or minimize conflicts at the intersection.

CONSTRUCTION

Activities associated with construction of a retail center in the No Action Alternative are expected to be comparable to those for the proposed project since the size of the No Action development is similar (although the No Action Alternative will not include circulation improvements). Similar to the proposed project, construction of the No Action Alternative would be staged primarily within the development site, thereby limiting any effects on surrounding roadways, and there is expected to be substantial flexibility in on-site construction equipment and materials staging areas within the project site, including accommodating worker parking on-site. Truck trips from the deliveries of materials and removal of trees and excavated materials associated with the No Action Alternative would be comparable to the proposed project. As with construction of the proposed project construction activities in the No Action Alternative would be limited in duration and intensity, and would be conducted in accordance with applicable regulatory requirements to avoid significant adverse impacts related to air quality and noise. Construction of the No Action Alternative would also be conducted in accordance with applicable regulatory requirements related to hazardous materials. However, unlike the proposed project, under the No Action Alternative there would be no requirement for subsurface testing or a Remedial Action Plan (RAP) and associated Construction Health and Safety Plan (CHASP). Therefore, absent the additional measures that would be implemented with the proposed project, in the No Action Alternative there would be a greater potential for adverse impacts related to hazardous materials during construction. In addition, unlike the proposed project, in the No Action Alternative, ground-disturbing construction activities could be conducted without the completion of archeological investigations to confirm the presence or absence of archaeological resources on the project site. Therefore, unlike the proposed project, the No Action Alternative has the potential to impact archaeological resources if such resources are present. Similarly, the No Action Alternative would not have the benefit of additional protections and review as there would be no requirement for subsurface testing or implementation of a Remedial Action Plan (RAP) and associated Construction Health and Safety Plan (CHASP). *