

## **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 adverse impacts of a proposed action while meeting some or all of the goals and objectives of this action. 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 new construction on the Stevenson Commons site in the Soundview neighborhood of Bronx Community District 9 with approximately 735 affordable dwelling units (DUs), including 621 income-restricted housing units and 114 affordable independent residences for seniors (AIRS), 33,995 gross square feet (gsf) of community facility uses, and approximately 1.94 acres of publicly accessible open space (the “Proposed Project”).

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 modification to the previously approved large scale residential development [LSRD] or City-aided limited-profit project).
- A No Unmitigated Significant Adverse Impacts Alternative, which considers a development scenario that would not result in any significant unmitigated adverse impacts.

## **B. PRINCIPAL CONCLUSIONS**

### **No-Action Alternative**

The No-Action Alternative examines future conditions in the Project Area, but assumes the absence of the Proposed Actions (i.e., none of the discretionary approvals proposed as part of the Proposed Actions would be adopted). Under the No-Action Alternative in 2028, it is expected that no new development would occur within the Project Area, which would continue to be occupied by the existing 948 DUs, 10,648 gsf of local retail uses, and 36,214 gsf of community facility uses (health center). 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 transportation and construction anticipated for the Proposed Actions would not occur 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 — the development of an additional 735 units of affordable housing for families and seniors, community facility space (including a child care center), and publicly-accessible open space — would not be realized under this alternative.

## 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 Project are changed specifically to avoid the unmitigated significant adverse impacts associated with the Proposed Actions. As presented in Chapter 18, “Mitigation” and Chapter 20, “Unavoidable Adverse Impacts,” there is the potential for the Proposed Project to result in unmitigated significant adverse impacts related to transportation (traffic) and construction (traffic and noise). Overall, in order to eliminate all unmitigated 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 Actions are not implemented. This includes no modification to the previously approved large scale residential development (LSRD) or City-aided limited-profit housing project. Conditions under this alternative are described in the preceding chapters as the “Future without the Proposed Actions,” 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 2028.

Under the No-Action Alternative, it is expected that no new development would occur within the Project Area. As such, the Project Area would continue to be occupied by the existing 948 DUs, 10,648 gsf of local retail uses, and 36,214 gsf of community facility uses (health center), as well as 570 at-grade accessory parking spaces (of which 462 spaces would be functional)<sup>1</sup> in the No-Action Alternative.

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 no new development would occur within the Project Area, which would continue to be occupied by the existing 948 DUs, 10,648 gsf of local retail uses, and 36,214 gsf of community facility uses (health center), as well as 570 at-grade accessory parking spaces (of which 462 spaces would be functional). Unlike the Proposed Actions, the No-Action Alternative would not provide any new affordable housing units, and would therefore be less supportive of public policies articulated in the City’s *Housing New York: A Five-Borough, Ten-Year Plan*, the City’s ten-year strategy to build or preserve 200,000 units of high quality affordable housing to meet the needs of more than 500,000 people. Moreover, unlike the Proposed Actions, the No-Action Alternative would not improve land use conditions in the study area by introducing new community facilities or publicly accessible open space to the Project Area.

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.

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<sup>1</sup> 462 of the 570 spaces are currently functional, as a portion of the parking square footage is used for onsite maintenance and storage.

## **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 or indirect residential or business displacement. However, unlike the Proposed Actions, no new affordable housing units would be introduced under the No-Action Alternative. The No-Action Alternative would not advance the goals of *Housing New York* discussed above, and, unlike the Proposed Actions, the No-Action Alternative would not help to maintain a diverse demographic composition within the study area by providing affordable housing options for families and seniors.

## **Community Facilities and Services**

The No-Action Alternative would not introduce any new residents to the study area and, therefore, would not result in any increase in demand on area community facilities. Additionally, unlike the Proposed Actions, the No-Action Alternative would not introduce any community facility space to the Project Area, and would therefore not provide a publicly funded early childhood center. Neither the Proposed Actions nor the No-Action Alternative would result in direct impacts to community facilities and services or indirect impacts to public schools, early childhood programs, library services, or police, fire, and emergency medical services.

## **Open Space**

Similar to the Proposed Actions, the No-Action Alternative would not result in any direct or indirect impacts on open space resources. The No-Action Alternative would not introduce any new residents or workers to the Project Area, and therefore, unlike the Proposed Actions, would not increase demands on open spaces within the half-mile study area. However, whereas the Proposed Actions are anticipated to introduce approximately 1.94 acres of publicly accessible open space, the No-Action Alternative would not create any new publicly accessible open spaces.

## **Shadows**

Neither the No-Action Alternative nor the Proposed Actions would result in significant adverse shadows impacts. Under the No-Action Alternative, no new structures would be built within the Project Area, and therefore no new incremental shadows would be cast on sunlight-sensitive resources in the surrounding area.

## **Historic and Cultural Resources**

Under the No-Action Alternative, no changes to the existing development in the Project Area is expected to occur. The No-Action Alternative would not result in in-ground disturbance or alterations to existing buildings, and no changes to any publicly accessible views of surrounding historic resources would occur as a result of the No-Action Alternative. Therefore, the No-Action Alternative would not result in any significant adverse impacts to archaeological or architectural resources, similar to the Proposed Actions.

## Urban Design and Visual Resources

Like the Proposed Actions, the No-Action Alternative would not have significant adverse impacts on urban design, view corridors, or visual resources. Under the No-Action Alternative, all of the existing buildings within the Project Area would remain as under existing conditions, and no new buildings or open space resources would be introduced. However, 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 publicly accessible open space that would help to enhance the pedestrian experience and provide physical and visual through block connectivity accessible to the public – would not be realized under the No-Action Alternative.

## Hazardous Materials

Like the Proposed Actions, the No-Action Alternative would not result in significant adverse hazardous materials impacts. Under the No-Action Alternative, no new development would occur within the Project Area, and therefore no additional in-ground disturbance would occur. The remedial activities outlined in the Remedial Action Plan (RAP) and Construction Health and Safety Plan (CHASP) for the Proposed Project would not be required under the No-Action Alternative. In either case, significant impacts with respect to hazardous materials are not expected under the Proposed Actions or the No-Action Alternative. Additionally, a Phase I Environmental Site Assessment (ESA) for the Development Site did not identify any Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs), Historical Recognized Environmental Conditions (HRECs), or De Minimis Conditions, and no additional investigation or action were recommended.

## Water and Sewer Infrastructure

In the No-Action Alternative, no new development would occur within the Project Area and therefore demands on water and sewer infrastructure would be less than under the Proposed Actions. Nevertheless, neither the Proposed Actions nor the No-Action Alternative would result in any significant adverse impacts on the City's water supply, wastewater or storm water conveyance and treatment infrastructure.

## Transportation

Under the No-Action Alternative, although no new development would occur within the Project Area, traffic, transit, pedestrian, and parking demand in proximity to the Project Area would increase as a result of background growth and other planned developments in the surrounding area unrelated to the Proposed Actions. However, these increases would be greater under the Proposed Actions.

### *Traffic*

Independent of the Proposed Actions, traffic levels of service (LOS) at a number of locations in the study area would experience congested conditions in the future. Under the No-Action Alternative, a total of four analyzed signalized intersections are expected to have at least one congested lane group in one or more peak hours, as compared to ~~six~~seven analyzed signalized intersections with the Proposed Actions. In the absence of the incremental demand that the Proposed Actions would generate, the No-Action Alternative would not result in the significant adverse traffic impacts identified for the Proposed Actions.

## **Transit**

### **SUBWAY**

Under the No-Action Alternative, demand at the Parkchester (No. 6) subway station is expected to increase as a result of background growth and new development in the surrounding area. All analyzed stairs and fare arrays at this analyzed station would continue to operate at an uncongested LOS A-C or better in both the AM and PM peak hours under both the No-Action Alternative and the Proposed Actions. Neither the No-Action Alternative nor the Proposed Actions would result in significant adverse impacts to subway stations and service.

### **BUS**

Under the No-Action Alternative demand on local bus services operating in the vicinity of the Project Area is expected to increase as a result of background growth and new development in the surrounding area. The existing level of bus service would not be sufficient to provide adequate supply to meet projected demand under the No-Action Alternative on the northbound Bx36 and Bx39 routes in the AM peak hour. Based on a loading guideline of 54 passengers per standard bus, during the AM peak hour, two additional standard buses would be required along the northbound Bx36 bus route and five additional standard buses would be required along the northbound Bx39 bus route to accommodate projected demand under the No-Action Alternative. The Proposed Actions' significant adverse impact to northbound and southbound Bx39 service in the AM peak hour would not occur under the No-Action Alternative.

### **Pedestrians**

Under the No-Action Alternative, pedestrian volumes along analyzed sidewalks, crosswalks, and corner areas are expected to increase compared to existing levels as a result of background growth as well as demand from planned developments in the surrounding area unrelated to the Proposed Actions.

### **SIDEWALKS**

As with the Proposed Actions, the analyzed sidewalk is expected to operate at an uncongested LOS A or B in all analyzed peak hours under the No-Action Alternative. No significant adverse sidewalk impacts would occur under either the Proposed Actions or the No-Action Alternative.

### **CROSSWALKS**

~~As with the Proposed Actions, t~~The analyzed crosswalk is expected to operate at an uncongested LOS A or B in all analyzed peak hours under the No-Action Alternative, compared to LOS C or better with the Proposed Actions. No significant adverse crosswalk impacts would occur under either the Proposed Actions or the No-Action Alternative.

### **CORNER AREAS**

As with the Proposed Actions, all analyzed corner areas are expected to operate at an uncongested LOS A in all peak hours under the No-Action Alternative. No significant adverse corner area impacts would occur under either the Proposed Actions or the No-Action Alternative.

### **Parking**

Under the No-Action Alternative, it is anticipated that no new development would occur on the Stevenson Commons site. Therefore, approximately 39 percent of spaces within the Project Area would remain utilized during the overnight period, leaving a residual supply of approximately 284 available parking

spaces. No significant adverse parking impacts would occur under either the Proposed Actions or the No-Action Alternative.

## **Air Quality**

### ***Mobile Sources***

Under the No-Action Alternative, emissions from traffic demand in the study area would increase as a result of background growth, and other development projects likely to occur in the surrounding area. As presented in Chapter 12, “Air Quality,” under the No-Action Alternative, no exceedances of the National Ambient Air Quality Standards (NAAQS) for particulate matter less than ten micron in diameter (PM<sub>10</sub>) would occur due to mobile sources. Therefore, as under the Proposed Actions, significant adverse mobile source impacts are not anticipated under the No-Action Alternative.

### ***Stationary Sources***

In the future No-Action Alternative, it is anticipated that no new development would occur within the Project Area. Accordingly, emissions in the area from heating and hot water systems would be similar to existing conditions, which would be less than in the future with the Proposed Actions. As under the Proposed Actions, significant adverse stationary source air quality impacts are not anticipated under the No-Action Alternative.

## **Greenhouse Gas Emissions and Climate Change**

With no new development within the Project Area, the No-Action Alternative would have less energy use than the Proposed Actions and would therefore result in fewer carbon dioxide equivalent (CO<sub>2</sub>e) emissions per year. Neither the Proposed Actions nor the No-Action Alternative would result in significant adverse greenhouse gas (GHG) emissions or climate change impacts.

## **Noise**

Like the Proposed Actions, the No-Action Alternative would not result in significant adverse noise impacts. Noise levels under the No-Action Alternative would not be expected to be significantly higher than existing levels. Under this alternative, noise levels would be in the “Marginally Acceptable” CEQR noise exposure category at the noise receptor locations in the study area, whereas under the Proposed Actions noise levels would range from the “Marginally Acceptable” to the “Marginally Unacceptable (I)” CEQR noise exposure category.

## **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 not cause significant adverse impacts in the areas of land use, zoning, and public policy; socioeconomic conditions; open space; historic and cultural resources; shadows; urban design and visual resources; or noise. As detailed in Chapter 16, “Neighborhood Character,” the significant adverse transportation impacts of the Proposed Actions would not affect any defining feature of neighborhood character, nor would a combination of moderately adverse effects affect such a defining feature.

Neither the Proposed Actions nor the No-Action Alternative would result in significant adverse impacts to neighborhood character. However, the improvements to neighborhood character that would occur under the Proposed Actions – such as the introduction of affordable housing options, community facility space, publicly accessible open space, street trees, and activated street walls around the Project Area – would not occur under the No-Action Alternative.

## Construction

As described in Chapter 17, “Construction,” the Proposed Actions would result in significant construction-related traffic and noise impacts. However, as detailed above, under the No-Action Alternative, no construction is anticipated in the Project Area in absence of the Proposed Actions. Therefore, no significant adverse construction-related impacts would occur under this alternative.

## D. NO UNMITIGATED SIGNIFICANT ADVERSE IMPACTS 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 significant adverse impacts for which no practicable mitigation has been identified with respect to transportation (traffic) and construction-related traffic and noise. This alternative considers measures that would have to be taken to eliminate all of the Proposed Actions’ unmitigated significant adverse impacts. As detailed below, in order to result in no unmitigated significant adverse impacts, the Proposed DevelopmentProject would have to be modified to a point where the principal goals and objectives would not be fully realized.

### Transportation (Traffic)

As presented in Chapter 18, “Mitigation,” the Proposed Actions would result in significant adverse traffic impacts at seven study area intersections during one or more analyzed peak hours; specifically, 114 lane groups at seven intersections during the weekday AM peak hour, ~~three~~ two lane groups at two intersections in the weekday midday peak hour, seven lane groups at four intersections in the weekday PM peak hour, and ~~five~~ six lane groups at three intersections in the Saturday peak hour. Implementation of traffic engineering improvements such as signal timing changes and lane restriping would fully mitigate the significant adverse impacts to two lane groups at one intersection in the weekday AM peak hour, ~~two~~ one lane groups at one intersection in the weekday midday peak hour, two lane groups at one intersection

during the weekday PM peak hour, and ~~three~~ four lane groups at two intersections in the Saturday peak hour. Impacts to a total of ~~12~~ nine lane groups would remain unmitigated at six intersections in the weekday AM peak hour, one lane group at one intersection in the weekday midday peak hour, five lane groups at three intersections in the weekday PM peak hour, and two lane groups at one intersection in the Saturday peak hour.

Because of projected congestion at a number of these intersections in the No-Action condition, even a minimal incremental increase in traffic could result in unmitigated impacts. Specifically, two of the four impacted intersections would have a congested lane group in the weekday AM peak hour under the No-Action condition, and the other two would have a lane group operating at or over capacity during this peak hour. According to the *CEQR Technical Manual*, for a lane group that would operate at LOS F in the No-Action condition, a projected increase in delay of three or more seconds is considered a significant impact. As such, small increases in incremental With-Action traffic volumes at some of the congested intersection approach movements would result in significant adverse impacts that could not be fully mitigated during the weekday AM peak hour. In order to avoid unmitigated traffic impacts, the Proposed ~~Development~~ Project program would have to be reduced by approximately 38 percent (i.e., approximately 279 fewer units), and such a reduction would inhibit the goals of the Proposed Actions to maximize the development of affordable housing on the Development Site. As such, no reasonable alternative could be developed to completely avoid significant adverse traffic impacts at these locations without substantially compromising the Proposed Actions' stated goals.

## Construction

### Traffic

As presented in Chapter 17, "Construction," the construction traffic under peak quarter construction conditions for the Proposed Project would result in significant adverse traffic impacts at three study area intersections during one or both analyzed construction peak hours; specifically, one lane group at one intersection in the AM construction peak hour, and three lane groups at three intersections in the PM construction peak hour. Implementation of traffic engineering improvements such as signal timing changes and lane restriping would fully mitigate the significant adverse impact in the construction AM peak hour, and two lane groups at two intersections would be fully mitigated in the construction PM peak hour. Impacts to one lane group would remain unmitigated at one intersection in the construction PM peak hour. Because of projected congestion in the No-Action condition at this one unmitigated intersection in the construction PM peak hour, the number of average daily workers and truck deliveries in the peak quarter of construction would have to be reduced by approximately 84 percent (resulting in an incremental increase of 11 vehicle trips), to avoid unmitigated traffic impacts during construction of the Proposed Project. This potential reduction would require substantially reducing the Proposed Project to a point where it would no longer meet the purpose and need of the Proposed Actions. As such, no reasonable alternative could be developed to completely avoid significant adverse construction traffic impacts without substantially compromising the Proposed Actions' stated goals.

### {Noise}

As detailed in Chapter 17, "Construction," construction of the Proposed ~~Development~~ Project could result in significant adverse impacts at sensitive receptors in the vicinity of the proposed construction work areas and along truck routes to and from the Development Site. 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 Development Site,

any development 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 proposed affordable residential units and community facility space could occur on the 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.