

A. INTRODUCTION

Consistent with City Environmental Quality Review (CEQR) requirements, this chapter of this Supplemental Environmental Impact Statement (SEIS) examines alternatives to the proposed project, which is a modification to the previously approved Willets Point Development Plan.

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. As described in detail below in Section B, “Summary of Findings—2008 FGEIS and Subsequent Technical Memoranda,” the other alternatives evaluated in the 2008 FGEIS are not being considered in this analysis.

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 below is the No Unmitigated Significant Impacts Alternative, which examines the level of development that would be necessary to avoid all the potential unmitigated impacts associated with the proposed project.

PRINCIPAL CONCLUSIONS

NO ACTION ALTERNATIVE

The No Action Alternative assumes the continuation of existing uses on the various portions of the project site. Since this alternative would allow the continued industrial use of the District, it would not allow for development of affordable housing, community facilities, schools, and public open space. It also would not comprehensively remediate contaminated soils and groundwater, nor provide new sanitary and storm sewers; as a result, there would continue to be degraded water quality and potential impacts to aquatic biota through the continued discharge of wastewater, polluted stormwater, and sediments from the District to the Flushing River, Flushing Bay, and groundwater aquifers. Because the No Action Alternative would not develop new retail and entertainment uses at Willets West and the District, it would not generate the substantial economic and civic benefits resulting from the proposed project in the way of new jobs and tax revenues. Moreover, this alternative would not advance a number of the Downtown Flushing Development Framework’s fundamental goals, including the creation of a regional destination that would enhance economic growth in Downtown Flushing and Corona, improvement of environmental conditions, and integration of new development in the District with surrounding amenities. The former Empire Millwork Corporation Building would remain under private ownership in the No Action Alternative and could be demolished as-of-right; mitigation measures such as photographic documentation would not be required.

NO UNMITIGATED SIGNIFICANT IMPACTS ALTERNATIVE

The No Unmitigated Significant Impacts Alternative explores modifications to the proposed project that would avoid the unmitigated significant impacts to historic and cultural resources, traffic, transit, and pedestrians:

- For historic and cultural resources, this alternative would avoid the demolition of the former Empire Millwork Corporation Building that would occur with Phase 2 of the proposed project. Although this could be achieved through adaptive reuse, exterior elements would still need to be upgraded to comply with building codes and noise attenuation requirements, and flood protection measures such as gates or pumps would be required to comply with flood insurance requirements. Overall, this alternative would reduce the footprint of any new development, which would result in greater density in the remainder of the District, fewer housing units, less open space, or some combination of these possibilities. As noted above, the former Empire Millwork Corporation Building could be demolished as-of-right under existing conditions, and mitigation measures such as photographic documentation would not be required.
- For traffic, the proposed project and the potential future development on Lot B would result in significant adverse impacts that cannot be fully alleviated with practical mitigation measures. Because of existing congestion at a number of intersections, even a minimal increase in traffic would result in unmitigated impacts. Based on a sensitivity analysis of intersections within the study area, it was determined that in all three phases of the proposed project, the addition of five or fewer vehicles through some intersections would trigger an impact that cannot be fully mitigated. Thus, almost any new development at the project site would result in unmitigated traffic impacts, and no reasonable alternative could be developed to avoid such impacts.
- For transit, the proposed project and potential future development on Lot B would result in significant adverse subway line-haul impacts on the Manhattan-bound No.7 subway line express service during the 2032 AM peak period and on station operations at the Mets-Willets Point subway station under the 2018, 2028, and 2032 With Action conditions. Although the City had consulted with the MTA on extending regular LIRR service to Willets Point, which would be expected to provide substantial relief to the No. 7 subway line and may prevent this significant adverse subway impact from materializing, the implementation of the LIRR service improvement would depend on whether the actual future demand shows that such service improvement is warranted. To avoid this potentially unmitigatable impact, portions or all of Phase 2 of the proposed project and the potential future development on Lot B would need to be eliminated from the current development plan. Almost any new development at the project site would result in the potentially unmitigatable impact on station operations at the Mets-Willets Point subway station, and no reasonable alternative could be developed to avoid such impacts without substantially compromising the proposed project's stated goals.
- For pedestrians, the proposed project and potential future development on Lot B would result in significant adverse impacts at five study area crosswalks upon Phase 1A and Phase 1B completion, in 2018 and 2028, respectively, and at eight study area crosswalks upon the Phase 2 full build-out in 2032. No reasonable alternative could be developed to avoid these impacts without substantially compromising the proposed project's stated goals.

B. SUMMARY OF FINDINGS—2008 FGEIS AND SUBSEQUENT TECHNICAL MEMORANDA

The 2008 FGEIS examined five alternatives, including:

- A No Action Alternative, which described the conditions that would exist if the 2008 Willets Point Development Plan were not implemented;
- A No Unmitigated Impact Alternative, which examined the level of development that would be necessary to avoid all the potential unmitigated impacts associated with the 2008 Willets Point Development Plan;
- A Flushing Bridge Alternative, which assessed the 2008 Willets Point Development Plan with a new pedestrian bridge connecting the District and Downtown Flushing;
- A Municipal Services Alternative, which evaluated conditions that would have been likely to occur if the District were not rezoned but additional municipal services were provided to the District; and
- A Staged Acquisition Alternative, in which properties in the District would have been acquired and infrastructure developed over time.

The No Action Alternative considered in the FGEIS was intended to avoid some of the adverse environmental impacts of the 2008 Willets Point Development Plan but would not have resulted in the benefits of the 2008 proposed project. The No Unmitigated Impact Alternative considered in the FGEIS explored modifications to the 2008 Willets Point Development Plan that would have mitigated project impacts to historic resources, traffic, pedestrians, and noise. The subsequent Technical Memoranda 3 and 4 considered an Adjusted Plan and an Updated Plan, which, like the Staged Acquisition Alternative, proposed development in stages. As the proposed project assumes a very similar development of the District in stages, a re-evaluation of the Staged Acquisition Alternative is not necessary.

While the 2008 FGEIS concluded that the Flushing Bridge Alternative would improve pedestrian access to the District as well as access to the District's proposed open space, and would help integrate new development in the District with surrounding amenities, this alternative also would require a variety of approvals, including: acquisition of property, an easement, or a lease for right-of-way on state-owned property; approval by the New York State Department of Transportation (NYSDOT) and potentially Federal Highway Administration (FHWA) for construction of new structures above the Van Wyck Expressway ramps; approval by the New York State Department of Environmental Conservation (DEC) and potentially the U.S. Army Corps of Engineers (USACE) for construction above and adjacent to the Flushing River; and approval by the City of New York for acquisition of property, an easement, or a lease of private property within the view corridor of 37th Avenue east of the Flushing River. No application for such actions has been made, and no funding has been allocated or is planned for allocation to the construction of such a bridge. Therefore, the Flushing Bridge Alternative is not analyzed in this SEIS.

The 2008 FGEIS concluded that the Municipal Services Alternative would not result in the creation of a dynamic, sustainable community that integrates regional attractions and residential, retail, and other uses; would not provide for new affordable housing units, community facilities, or open space within the District; and would not advance a number of the Downtown Flushing Development Framework's fundamental goals, including the creation of a regional destination that would enhance economic growth in Downtown Flushing and Corona, and integration of

new development in the District with surrounding amenities. Furthermore, as the municipal improvements that would have taken place under this alternative would have been largely limited to public property, and existing private properties would remain developed with buildings at their current grade, this alternative presented more serious complications with respect to the feasibility of effectively upgrading the area's infrastructure than would redevelopment of the District as would have occurred under the Willets Point Development Plan. The Municipal Services Alternative also would not result in the filling of the District to flood elevation. The Municipal Services Alternative also would not result in comprehensive site remediation of the District, which is one of the goals of the proposed project. No changes to background conditions, differences in elements between the development program analyzed in the 2008 FGEIS and the proposed project, or changes in analysis methodology would alter these conclusions. Therefore, the Municipal Services Alternative is not analyzed in this SEIS.

C. NO ACTION ALTERNATIVE

DESCRIPTION

The No Action Alternative has been discussed as the “future without the proposed project” in the technical chapters of this SEIS. The No Action Alternative assumes that the existing uses within the Special Willets Point District, Willets West, as well as South Lot and Lot D would remain and that the mix of uses would not be developed. The No Action Alternative also assumes that the potential future development on Lot B would not occur. As such, the No Action Alternative would not require the special permit to allow surface parking/open and enclosed privately operated recreation uses within the District, modification of the existing lease for the CitiField and adjacent parking properties, or any revisions to the previously approved City Maps to modify the staging for the closure of City streets. The No Action Alternative would also not result in the remediation of contaminated soils within the District; filling of the District to above flood elevation; or the creation of new streets, sewers, and other public infrastructure within the District.

LAND USE, ZONING, AND PUBLIC POLICY

LAND USE

The No Action Alternative, like the proposed project, would not result in significant adverse impacts on land use, zoning, and public policy. However, neither would it result in the positive effects that the proposed project would provide.

Without the proposed project, it is expected that the District would continue to have the industrial and auto-related uses that are currently there and would continue to be isolated from surrounding neighborhoods, and that the Willets West and Roosevelt Avenue portions of the project site would continue to serve the parking needs of CitiField. The existing uses in the remainder of the Willets Point peninsula, including the undeveloped Metropolitan Transportation Authority (MTA) property to the east of the District, also are expected to remain unchanged. The substantial amount of new development under construction or planned within the primary and secondary study areas would occur over the long term without the proposed project, following current development projects and alongside other initiatives proposed as part of the 2004 Downtown Flushing Development Framework.

The planning effort being undertaken by the Flushing Willets Corona Local Development Corporation (FWCLDC), in consultation with the New York City Department of City Planning (DCP), with funding from the New York State Department of State (NYSDOS) under the Brownfield Opportunity Areas (BOA) Program would still occur under the No Action Alternative; however, the No Action Alternative would not advance a number of the Downtown Flushing Development Framework's fundamental goals, including facilitating future growth and sustainability of the area through the redevelopment of Willets Point. Furthermore, the environmental remediation that would be undertaken with the proposed project would not occur and would not lead to improved environmental conditions in the District.

ZONING

Under the No Action Alternative, no changes to zoning are anticipated for the project site. Some changes to zoning would occur in study areas, related to the No Build projects identified in Chapter 2, "Land Use, Zoning and Public Policy."

PUBLIC POLICY

Under the No Action Alternative, no new policies are expected that would affect the project site or the primary and secondary study areas. Without the proposed project, an essential component of the Downtown Flushing Development Framework—the redevelopment of the Willets Point peninsula—would not proceed, and many of the Framework's goals, which focus on facilitating future growth and sustainability of the area through the redevelopment of Willets Point, would not be achieved. It is expected that the City would continue to explore opportunities to advance the other components of the Framework, such as opportunities for mixed-use development in Downtown Flushing, enhancements to public open spaces and streetscapes, improved connections between Downtown Flushing and the Flushing waterfront, and transportation and parking strategies. Goals such as improving environmental conditions in the District and enhancing adjacent regional destinations would not likely be achieved in the future without the proposed project. Additionally, as Willets West, the South Lot, Lot D, and Lot B would remain surface parking areas, the goals outlined in the Framework, such as creating regional destinations that would enhance economic growth in Downtown Flushing and Corona, also are unlikely to be achieved.

SOCIOECONOMICS

The No Action Alternative would not result in direct or indirect residential or business displacement, would not require property acquisition or the relocation of businesses, and would not generate substantial new residents or employees in Queens. The existing auto-related and other businesses would continue to operate, and the one residential unit would remain.

The No Action Alternative would not contribute to the revitalization of the Special Willets Point District or the surrounding area. The proposed project includes a mix of residential, entertainment/retail, hotel, convention center, commercial office, community facility, a public school, publicly accessible open space, and parking uses in the District, Willets West, and Roosevelt Avenue portions of the project site. Under this Alternative, these uses would not be developed, jobs would not be created, and the supply of affordable housing in the study area would not be increased.

Therefore, the No Action Alternative would not result in the economic benefits derived from new jobs, consumers, and residents in the District and Willets West. While the No Action

Alternative would not involve the same expenditure of public funds as the proposed project, it would not result in the substantial economic benefits that would be realized with the proposed project.

COMMUNITY FACILITIES

SCHOOLS

Under the No Action Alternative, elementary and intermediate schools in CSD 25/Sub-District 2 and high schools in Queens will be over capacity in 2018, 2028, and 2032. Unlike the proposed project, the No Action Alternative would not generate new demand for public school seats; however, the proposed project would not result in significant adverse impacts on high schools, and would avoid significant adverse impacts on elementary and intermediate schools by creating new school capacity. The Queens Development Group, LLC (QDG) would coordinate with the School Construction Authority (SCA) to determine whether the public school space currently planned as part of Phase 1B would be sufficient to accommodate all of the school children generated by the proposed project by 2028. Provision of the school in Phase 1B would be ensured through a contractual agreement. If necessary, the school spaces would be expanded, and corresponding reductions in square footage would be made elsewhere in the development program. For Phase 2, the New York City Economic Development Corporation (EDC) would require as part of the developer's agreement that the designated developer similarly coordinate with SCA.

LIBRARIES

Under the No Action Alternative the delivery of library services in the study area would be adversely affected in 2032. To mitigate this impact, the 125,000 square feet of as-yet-unprogrammed community facility space in the program for Phase 2 could potentially be utilized as a branch library or auxiliary facility for the Queens Library system, or additional volumes or programs to accommodate new users could be provided if adequate space in nearby branches exists. Although no developer has yet been designated for Phase 2, the provision of additional library space in Phase 2 would be based on further consultation with Queens Public Library and the lead agency.

CHILD CARE

Under the No Action Alternative, known planned or proposed development projects in the study area would introduce approximately 76 additional children under age six who would be eligible for publicly funded child care programs. Therefore, the utilization rate for publicly funded child care facilities serving the study area is assumed to increase from 97 percent under existing conditions to 107 percent in the No Action Alternative, with a shortfall of 55 slots. By comparison, the proposed project may result in significant adverse impacts on publicly funded child care facilities in 2028. To mitigate this impact, QDG would consult with the New York City Administration for Child Services (ACS) to determine whether adding capacity to existing facilities or providing a new child care facility within or near the area surrounding the project site is the appropriate way to meet demand for child care services generated by the proposed project. EDC would require, as part of the developer's agreement, that the designated developer of Phase 2 similarly consult with ACS to determine the appropriate way to meet demand for child care services generated by development in the District by 2032. Such mitigation would not occur in the No Action Alternative.

HEALTHCARE

Like the proposed project, the No Action Alternative would not adversely affect the overall provision of health care services.

POLICE AND FIRE PROTECTION SERVICES

The No Action Alternative would generate fewer new worker and visitor populations and would result in a lower demand for police and fire protection services than the proposed project. With the proposed project, both NYPD and FDNY would continue to reevaluate their staffing and resource needs and would continue to have the ability to adjust to congestion en route to emergencies. Response times are not expected to dramatically change in such a way as to result in a significant adverse impact.

OPEN SPACE

The No Action Alternative would not generate the same level of demand for open space resources as the proposed project; however, it also would not introduce substantial new open space within the District. Under the No Action Alternative, residents and workers within the study area would continue to be well served by open space. With the proposed project, open space ratios would remain above the recommended City guidelines, with the exception of the active open space ratio, which would decrease from 1.81 acres per 1,000 residents in the No Action Alternative to 1.55 in the 2028 With Action condition and 1.32 in the 2032 With Action condition. However, these decreases would not result in a significant adverse open space impact.

SHADOWS

Unlike the proposed project, the No Action Alternative would not cast any new shadows on public open space or other sun-sensitive resources. Neither the No Action Alternative nor the proposed project would result in any significant adverse shadows impacts.

HISTORIC AND CULTURAL RESOURCES

Neither the No Action Alternative nor the proposed project would adversely affect archaeological resources. Unlike the proposed project, under the No Action Alternative there would be no adverse impacts to historic resources. With the proposed project, it is anticipated that the former Empire Millwork Corporation Building would be demolished, resulting in a significant adverse impact on this historic resource.

URBAN DESIGN AND VISUAL RESOURCES

Unlike the proposed project, the No Action Alternative would not alter the urban design of the project site. The No Action Alternative would not result in any new construction on the project site, whereas the proposed project would result in the development of multiple buildings of varying heights and the transformation of this area with new residential, entertainment/retail, hotel, school, community facility, office, and convention center. The No Action Alternative also would not result in the creation of any new public open space within the District. While the proposed project would create some taller structures within the District, it would not adversely affect any views to visual resources in the surrounding area. Therefore, neither the No Action Alternative nor the proposed project would adversely affect urban design or visual resources.

NATURAL RESOURCES

Like the proposed project, the No Action Alternative would not result in significant adverse impacts on floodplains, wetlands, sediments, groundwater, terrestrial resources, aquatic resources, endangered, threatened species, or species of special concern and rare ecological communities, and Essential Fish Habitat (EFH). In the No Action Alternative, the several proposed and ongoing projects aimed at improving water quality and aquatic resources in New York, including in Flushing Bay and Flushing River, would occur independently of the proposed project. However, the No Action Alternative would not result in improvements to the existing infrastructure within the District, and the grade would not be raised above the floodplain. As a result, frequent flooding of the area would continue, and the stormwater runoff would continue to pose a threat to the surrounding water bodies and groundwater.

HAZARDOUS MATERIALS

Under the No Action Alternative, in the event that projects independent of the proposed project were to occur, such development would not be expected to result in significant adverse impacts with respect to hazardous materials. With the No Action Alternative, the Special Willets Point District portion of the project site would have both continued New York State Department of Environmental Conservation (NYSDEC) involvement (related to spill cleanup and enforcement actions) and NYC Office of Environmental Remediation (OER) involvement related to the existing E designations. For portions of the sites outside of the District, any future development would be subject to new City leases and/or disposition agreements which would set forth hazardous materials requirements, similar to those associated with the proposed project, but tailored to the development (e.g., extent of proposed soil disturbance and land use).

WATER AND SEWER INFRASTRUCTURE

Neither the No Action Alternative nor the proposed project would result in any significant adverse impacts to water and sewer infrastructure. However, in the No Action Alternative, the infrastructure that would be constructed as part of the proposed project would likely not be built, the grade would likely not be raised to above the floodplain, and the District would continue to be vulnerable to frequent flooding. Under the No Action Alternative, stormwater runoff would likely continue to carry existing suspected contaminants from the site to nearby water bodies and groundwater. Existing water demand and sanitary sewer generation is expected to remain unchanged. Future sanitary sewage generation is estimated to continue to be directed to the existing septic system, but a limited volume may be directed to the municipal infrastructure improvements currently under construction. No changes to the stormwater runoff coefficient would occur in the No Action Alternative. New York City Department of Environmental Protection (DEP) is working to reduce combined sewer overflows (CSOs) via upgrades at water pollution treatment plants (WTP), storm sewer expansions, and CSO retention tanks, and as with the proposed project, a reduction in CSOs would occur. With the proposed project, infrastructure improvements would be implemented for various phases of the project.

SOLID WASTE AND SANITATION

Neither the No Action Alternative nor the proposed project would result in significant adverse impacts to solid waste and sanitation. The No Action Alternative would not result in new development on the project site; therefore, it would not generate new demand for municipal solid waste collection and also would not result in the displacement of two waste transfer businesses

currently operating in the District. Independent of the proposed action, there would be some changes in the City's waste management services to the project site, including completion of a new Marine Transfer Station (MTS) that will have the capacity to handle up to 3,672 tons per day of solid waste under normal conditions.

ENERGY

The No Action Alternative would generate less energy demand than the proposed project. With both the No Action Alternative and the proposed project, it is expected that measures will be taken to provide adequate electrical capacity to the New York City metropolitan area through 2032 and beyond. It is also assumed that Con Edison would continue to implement its electrical distribution improvement programs in Queens. In the future, it is expected that the existing trend toward sustainability would lead to greater energy efficiency in the City. Therefore, it is anticipated that energy supplies could meet the demand from the project site under both the No Action Alternative and the proposed project.

TRANSPORTATION

TRAFFIC

While the No Action Alternative would not generate new vehicular traffic, there would be increased volumes from background growth and other proposed development projects outside of the project site. Overall, the resulting volumes would be lower than with the proposed project; however, there would be a number of intersections on a typical weekday with substandard operations with the No Action Alternative.

The summary overview of the No Action Alternative for Phase 1A (2018) without a Mets game indicates that:

- In the weekday AM peak hour, of the 26 signalized intersections analyzed, the number of locations that are projected to operate at overall LOS E or F would increase from none under existing conditions to eight. The number of traffic lane groups projected to operate at LOS E or F would increase from 13 to 32.
- In the weekday midday peak hour, the number of signalized intersections that would operate at overall LOS E or F would increase from zero to five, while the number of traffic lane groups at LOS E or F would increase from eight to 26.
- In the weekday PM peak hour, the number of locations that are projected to operate at overall LOS E or F would increase from none under existing conditions to six. The number of lane groups projected to operate at LOS E or F would increase from 13 to 34.
- In the Saturday midday peak hour, the number of signalized intersections that would operate at overall LOS E or F would increase from zero to eight, while the number of lane groups at LOS E or F would increase from 11 to 33.

Under the No Action Alternative with a Mets game for Phase 1A, traffic conditions in the study area would be as described below:

- In the weekday PM pre-game peak hour, of the 26 signalized intersections analyzed, the number of locations that are projected to operate at LOS E or F would increase from zero under existing conditions to eight. The number of traffic lane groups projected to operate at LOS E or F would increase from 16 to 32.

Willeys Point Development

- In the Saturday afternoon pre-game peak hour, the number of locations that are projected to operate at LOS E or F would increase from zero under existing conditions to nine. The number of lane groups projected to operate at LOS E or F would increase from 18 to 33. The unsignalized intersection of Boat Basin Road at Stadium Road/CitiField Entrance 8 would operate at LOS E.
- In the Saturday PM post-game peak hour, the number of locations that are projected to operate at LOS E or F would increase from zero under existing conditions to 11. The number of lane groups projected to operate at LOS E or F would increase from 16 to 38. The unsignalized intersections of Boat Basin Road at World's Fair Marina and Grand Central Parkway Ramp at West Park Loop/Stadium Road would operate at LOS E, and the unsignalized intersection of Boat Basin Road at Stadium Road/CitiField Entrance 8 would operate at LOS F.

The summary overview of the No Action Alternative for Phase 1B (2028) without a Mets game indicates that:

- In the weekday AM peak hour, of the 26 signalized intersections analyzed, the number of locations that are projected to operate at overall LOS E or F would increase from none under existing conditions to eight. The number of traffic lane groups projected to operate at LOS E or F would increase from 13 to 33.
- In the weekday midday peak hour, the number of signalized intersections that would operate at overall LOS E or F would increase from zero to six, while the number of traffic lane groups at LOS E or F would increase from eight to 27.
- In the weekday PM peak hour, the number of locations that are projected to operate at overall LOS E or F would increase from none under existing conditions to nine. The number of lane groups projected to operate at LOS E or F would increase from 13 to 35.
- In the Saturday midday peak hour, the number of signalized intersections that would operate at overall LOS E or F would increase from zero to nine, while the number of lane groups at LOS E or F would increase from 11 to 37.

Under the No Action Alternative with a Mets game for Phase 1B, traffic conditions in the study area would be as follows.

- In the weekday PM pre-game peak hour, of the 26 signalized intersections analyzed, the number of locations that are projected to operate at LOS E or F would increase from zero under existing conditions to eight. The number of traffic lane groups projected to operate at LOS E or F would increase from 16 to 37.
- In the Saturday afternoon pre-game peak hour, the number of locations that are projected to operate at LOS E or F would increase from zero under existing conditions to 11. The number of lane groups projected to operate at LOS E or F would increase from 18 to 35. The unsignalized intersection of Boat Basin Road at Stadium Road/CitiField Entrance 8 would operate at LOS F.
- In the Saturday PM post-game peak hour, the number of locations that are projected to operate at LOS E or F would increase from zero under existing conditions to 13. The number of lane groups projected to operate at LOS E or F would increase from 16 to 38. The unsignalized intersection of Grand Central Parkway Ramp at West Park Loop/Stadium Road would operate at LOS E, and the unsignalized intersections of Boat Basin Road at World's Fair Marina and Boat Basin Road at Stadium Road/CitiField Entrance 8 would operate at LOS F.

The summary overview of the No Action Alternative for Phase 2 (2032) without a Mets game indicates that:

- In the weekday AM peak hour, of the 26 signalized intersections analyzed, the number of locations that are projected to operate at overall LOS E or F would increase from none under existing conditions to eight. The number of traffic lane groups projected to operate at LOS E or F would increase from 13 to 35.
- In the weekday midday peak hour, the number of signalized intersections that would operate at overall LOS E or F would increase from zero to seven, while the number of traffic lane groups at LOS E or F would increase from eight to 28.
- In the weekday PM peak hour, the number of locations that are projected to operate at overall LOS E or F would increase from none under existing conditions to nine. The number of lane groups projected to operate at LOS E or F would increase from 13 to 34.
- In the Saturday midday peak hour, the number of signalized intersections that would operate at overall LOS E or F would increase from zero to ten, while the number of lane groups at LOS E or F would increase from 11 to 37.

Under the No Action Alternative with a Mets game for Phase 2, traffic conditions in the study area would be as follows.

- In the weekday PM pre-game peak hour, of the 26 signalized intersections analyzed, the number of locations that are projected to operate at LOS E or F would increase from zero under existing conditions to eight. The number of traffic lane groups projected to operate at LOS E or F would increase from 16 to 39.
- In the Saturday midday pre-game peak hour, the number of locations that are projected to operate at LOS E or F would increase from zero under existing conditions to 12. The number of lane groups projected to operate at LOS E or F would increase from 18 to 38. The unsignalized intersection of Boat Basin Road at Stadium Road/CitiField Entrance 8 would operate at LOS F.
- In the Saturday PM post-game peak hour, the number of locations that are projected to operate at LOS E or F would increase from zero under existing conditions to 14. The number of lane groups projected to operate at LOS E or F would increase from 16 to 38. The unsignalized intersection of Grand Central Parkway Ramp at West Park Loop/Stadium Road would operate at LOS E, and the unsignalized intersections of Boat Basin Road at World's Fair Marina and Boat Basin Road at Stadium Road/CitiField Entrance 8 would operate at LOS F.

The proposed project would result in more locations with substandard operations, but as detailed in Chapter 21, "Mitigation," depending on the peak hour, approximately one-half or more of the significantly impacted locations could be fully or partially mitigated with traffic signal operation changes, such as signal phasing and/or timing changes, signalization of an unsignalized intersection, lane re-striping, parking prohibitions, or turn prohibitions, with the exception of three locations—including 126th Street at Northern Boulevard, 126th Street/Grand Central Parkway (GCP) ramp at 34th Avenue, and the GCP exit ramp at West Park Loop/Stadium Road—which would require special, more intensive mitigation measures to partially or fully mitigate the significant impacts in peak hours.

For significant adverse impacts that would be unmitigated or partially mitigated with the proposed project, traffic operations would be better under the No Action Alternative. However,

in either case, there would continue to be a number of congested locations within the study area with LOS E or F conditions during the peak hours analyzed.

HIGHWAY NETWORK

The No Action Alternative would not generate new vehicular traffic on the highway network, but there would be increased volumes from background growth and other proposed development projects outside of the project site. In addition, the proposed ramp connection to the Van Wyck Expressway (proposed under the Phase 1B and 2 With Action conditions) would not be provided as part of the No Action Alternative. With the proposed project, volumes would be higher during all time periods, but in both the No Action and With Action scenarios, there would be considerable congestion at multiple locations within the highway network.

Under the Phase 1A No Action Alternative, between two and seven of the 19 analyzed highway mainlines and ramps would operate at marginally unacceptable or unacceptable (LOS D, E, or F) conditions on non-game days during each peak hour of analysis. On game days, between five and nine of the 19 analyzed highway mainlines and ramps would operate at marginally unacceptable or unacceptable (LOS D, E, or F) conditions during each peak hour of analysis.

Under the Phase 1B No Action Alternative, between one and seven of the 19 analyzed highway mainlines and ramps would operate at marginally unacceptable or unacceptable (LOS D, E, or F) conditions on non-game days during each peak hour of analysis. On game days, between four and eight of the 19 analyzed highway mainlines and ramps would operate at marginally unacceptable or unacceptable (LOS D, E, or F) conditions during each peak hour of analysis.

Under the Phase 2 No Action Alternative, between one and seven of the 19 analyzed highway mainlines and ramps would operate at marginally unacceptable or unacceptable (LOS D, E, or F) conditions on non-game days during each peak hour of analysis. On game days, between four and ten of the 19 analyzed highway mainlines and ramps would operate at marginally unacceptable or unacceptable (LOS D, E, or F) conditions during each peak hour of analysis.

PARKING

The No Action Alternative itself would not generate new demand for parking, but it would also not provide for new on- or off-street parking within the project site. However, parking demand would increase as a result of background growth and other proposed development projects outside of the District.

Under the No Action Alternative, for all three phases of the proposed project, there would be adequate off-street parking to meet demand. The proposed project would provide an increased amount of off-street parking in each phase and, similar to the No Action Alternative, there would be enough overall off-street parking to meet demand.

On a typical weekday (both game day and non-game day), a weekend non-game day, and during the pre-game period on weekend game days, it is projected that on-street parking demand would be at or above capacity in all phases under the No Action Alternative. In Phases 1B and 2 of the proposed project, new on-street parking spaces would be provided within the District. During certain periods, this parking would not be fully occupied and could accommodate some of the non-project unmet demand that would occur under the No Action Alternative. Therefore, it is anticipated that the proposed project would provide for greater capacity to meet parking demand than the No Action Alternative.

Under the No Action Alternative, Mets parking would not be affected, whereas the proposed project would relocate 4,100 Mets parking spaces within the immediate area. Therefore, Mets parking needs would be similarly satisfied under both the No Action Alternative and the proposed project.

TRANSIT

The No Action Alternative itself would not generate new demand for subway service, but there would be additional riders from background growth and other proposed development projects outside of the project site. Under this alternative, all subway station stairways and control area elements would continue to operate at acceptable levels and all analyzed bus routes would continue to operate within their guideline capacities under the 2018, 2028, and 2032 No Action Alternative conditions. As with the proposed project, the No. 7 subway line would continue to operate within guideline capacity during the weekday AM peak period for the Manhattan-bound local service and during the PM peak period for the Flushing-bound service under the 2018, 2028, and 2032 No Action Alternative conditions. However, the Manhattan-bound express service would continue to exceed the guideline capacity during the weekday AM peak period under the 2018, 2028, and 2032 No Action Alternative conditions.

In 2018, both the No Action Alternative and the proposed project with Phase 1A completed would not result in any significant adverse transit impacts. In 2028, the No Action Alternative would not result in the significant adverse bus line-haul impacts on the Q19, Q48, and Q66 routes, as identified for the proposed project with Phase 1B completed. In 2032, the No Action Alternative would not result in the significant adverse impacts on the Mets-Willets Point subway station's north stairways, the No. 7 line Manhattan-bound express service, and the Q19, Q48, and Q66 bus routes, as identified for the proposed project with Phase 2 built out.

It should be noted that if NYCT reverts back to its pre-CitiField station operation plan, which could take place independent of the proposed project and whereby passage through the station between parking in South Lot/Lot D and the north side of Roosevelt Avenue could be made only within the unpaid zone, additional congestion would be expected on game days, which occur 40 to 50 times a year, for Met patrons traveling between parking in South Lot/Lot D and CitiField through the station. However, under the No Action Alternative, no significant adverse impacts would result at the circulation elements along this station pedestrian route, as would under the With Action conditions.

PEDESTRIANS

The No Action Alternative itself would not generate new pedestrian trips, but there would be additional demand from general background growth and other proposed development projects outside of the project site. Under this alternative, all pedestrian elements except for the north and south crosswalks of 34th Avenue and 126th Street during the weekend post-game peak period, would continue to operate at acceptable levels (maximum of 8.5 PMF platoon flows for sidewalks; minimum of 19.5 SFP for corners and crosswalks) during all analysis time periods under the 2018, 2028, and 2032 conditions.

In 2018, the No Action Alternative would not result in the significant adverse crosswalk impacts at the intersections of Northern Boulevard and 126th Street, Roosevelt Avenue and 126th Street, and 34th Avenue and 126th Street, as identified for the proposed project with Phase 1A completed. In 2028, the No Action Alternative would not result in the significant adverse crosswalk impacts at same three intersections, as identified for the proposed project with Phase

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1B completed. In 2032, the No Action Alternative would not result in the significant adverse crosswalk impacts at the same three intersections, as well as the intersections of New Willets Point Boulevard and 126th Street and Roosevelt Avenue and Lot B Driveway, as identified for the proposed project with Phase 2 built out.

AIR QUALITY

The No Action Alternative would result in less vehicular traffic than the proposed project, and the mobile source emissions would be lower. The No Action Alternative would allow for the continued operation of industrial uses within Willets Point. It would not result in the development of new recreational, residential, hotel, open space, and commercial uses (in Phases 1A and 1B) in close proximity to auto, manufacturing, and industrial uses that may remain in the area proposed for development in Phase 2. However, neither the proposed project nor the No Action Alternative would result in significant adverse air quality impacts. Unlike the proposed project, the No Action Alternative would allow the use of fuel oil for heating and hot water systems and would not require certain restrictions, such as requirements on the fuel type and the use of low-nitrogen oxide (low-NO_x) burners, to avoid potential stationary source air quality impacts.

GREENHOUSE GAS EMISSIONS

The No Action Alternative would result in no new development on the project site and less vehicular traffic in the study area than the proposed project, and therefore the potential GHG emissions associated with the No Action Alternative would be lower than with the proposed project. The potential GHG emissions associated with the proposed project in 2032 upon completion of Phase 2 (cumulative with Phases 1A and 1B) are projected to be approximately 160,500 metric tons of CO₂e. However, measures for reducing GHG emissions are included as part of the proposed project, making it consistent with the City's GHG reduction goal. Unlike the proposed project, the No Action Alternative would not include measures to reduce the vulnerability to flood damage, including grading and elevating the project site above the floodplain.

NOISE

The No Action Alternative would result in less vehicular traffic in the study area than the proposed project; however, ambient noise levels in the area would continue to be high. As with the proposed project, noise levels under the No Action Alternative (for the 2018, 2028, and 2032 analysis years) at World's Fair Marina Park (Receptor Site 3) and the intersection of Roosevelt Avenue between College Point Boulevard and Prince Street (Receptor Site 2) would be in the "marginally unacceptable" category, and noise levels at the intersection of Roosevelt Avenue between 114th Street and 111th Street (Receptor Site 1) would be in the "clearly unacceptable" category. With the proposed project, lots located within the District would have restrictions placed on them to ensure that adequate attenuation requirements are met within the proposed buildings.

PUBLIC HEALTH

Neither the No Action Alternative nor the proposed project would adversely affect public health.

NEIGHBORHOOD CHARACTER

The No Action Alternative would not alter the current character of the project site. It also would not result in new vehicle trips, and therefore, traffic operations would be less congested as compared with the proposed project. Like the proposed project, the No Action Alternative would not result in significant adverse impacts on neighborhood character.

While conditions with respect to traffic and noise would not be changed under the No Action Alternative, it would not provide the neighborhood character benefits of the proposed project. The No Action Alternative would not transform the area surrounding CitiField into a thriving new neighborhood and regional destination. Furthermore, the No Action Alternative would not represent a significant investment to improve the project area's infrastructure, nor would it remediate existing environmental contaminations as the proposed project would.

CONSTRUCTION

Since there would be no development under the No Action Alternative, potential significant adverse construction impacts related to transportation and historic and cultural resources with construction of the proposed project would not occur. However, the substantial economic benefits attributable to construction expenditures and construction jobs under the proposed project would not be realized under the No Action Alternative.

D. NO UNMITIGATED SIGNIFICANT IMPACTS ALTERNATIVE

DESCRIPTION

The proposed project would result in some unmitigated impacts with respect to historic and cultural resources, traffic, transit, and pedestrians. Therefore, as required by the *CEQR Technical Manual*, alternatives were developed to explore modifications to the proposed actions that would allow for the mitigation of these impacts.

HISTORIC AND CULTURAL RESOURCES

The proposed project would result in the demolition of the former Empire Millwork Corporation Building, which is considered eligible for State and National Registers of Historic Places (S/NR) listing by OPHRP, but measures such as photographic documentation of this resource would be undertaken to partially mitigate this impact. The No Unmitigated Significant Impacts Alternative would avoid demolition of this historic resource. Under this alternative, any new development within the District during Phase 2 of the proposed project would be designed so as to leave this structure in place. This could be achieved through adaptive reuse, but exterior elements such as windows and facades would need to be upgraded to comply with building codes and noise attenuation requirements. Furthermore, the building is located below flood elevation, and its site could not be raised if it would remain. Therefore, flood protection measures such as gates or pumps would be required to comply with flood insurance requirements. This alternative would involve the same discretionary actions as the proposed project. However, preservation of the building would need to be required through the developer's formal request for proposals (RFP) process.

Overall, this alternative would reduce the footprint of any new development within the District, which would result in greater density in the remainder of the District, fewer housing units, less open space, or some combination of these possibilities. The preservation of this resource would

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also significantly constrain the design of the proposed project in ways that could make future development of the District more difficult and may undermine the benefits of the proposed project. As noted under the No Action Alternative, the former Empire Millwork Corporation Building could be demolished as-of-right under existing conditions, and mitigation measures such as photographic documentation would not be required.

TRAFFIC

The proposed project and the potential future development on Lot B would result in significant adverse traffic impacts at intersections and on highway segments within the study area that cannot be fully alleviated with practical mitigation measures. As described more fully in Chapter 21, “Mitigation,” mitigation measures requiring further agency review prior to implementation are proposed for six intersections. If the mitigation measures at these locations are not implemented, unmitigated significant adverse impacts would occur.

Because of existing congestion at a number of intersections, even a minimal increase in traffic would result in unmitigated impacts. Based on a sensitivity analysis of intersections within the study area, it was determined that, even as early as in Phase 1A completion in 2018, the addition of five or less vehicles through some intersections would create an impact that cannot be fully mitigated. This would be the case for all three phases of the proposed project. Thus, almost any new development at the project site would result in unmitigated traffic impacts, and no reasonable alternative could be developed to avoid such impacts without substantially compromising the proposed project’s stated goals.

TRANSIT

The proposed project and potential future development on Lot B would result in significant adverse subway line-haul impacts on the Manhattan-bound No.7 subway line express service during the 2032 AM peak period and on station operations at the Mets-Willels Point subway station under the 2018, 2028, and 2032 With Action conditions. Although the City had consulted with the MTA on extending regular LIRR service to Willels Point, which would be expected to provide substantial relief to the No. 7 subway line and may prevent this significant adverse subway impact from materializing, the implementation of the LIRR service improvement would depend on whether the actual future demand shows that such service improvement is warranted. Since there are constraints on what service improvements are available to NYCT, the identified significant line-haul capacity impact on the No. 7 line would likely remain unmitigated absent the introduction of new LIRR service to the area. The feasibility of stairway widening and elevator installation at the Mets-Willels Point subway station will be further evaluated between the Draft and Final SEIS. In the event these mitigation measures are determined to be infeasible, the projected significant adverse stairway impacts would be deemed unmitigatable.

To avoid the potentially unmitigatable impact on line-haul capacity, portions or all of Phase 2 of the proposed project and potential future development on Lot B would need to be eliminated from the current development plan. Almost any new development at the project site would result in the potentially unmitigatable impact on station operations at the Mets-Willels Point subway station, and no reasonable alternative could be developed to avoid such impacts without substantially compromising the proposed project’s stated goals.

PEDESTRIANS

The proposed project and potential future development on Lot B would result in significant adverse pedestrian impacts at five study area crosswalks upon Phase 1A and Phase 1B completion, in 2018 and 2028, respectively, and at eight study area crosswalks upon the Phase 2 full build-out in 2032. Although potential pedestrian mitigation measures, some of which in conjunction with the proposed traffic mitigation measures, have been developed to address these impacts to the extent practicable, potentially unmitigatable pedestrian impacts could still occur with the development of Phase 1A of the proposed project. Hence, no reasonable alternative could be developed to avoid such impacts without substantially compromising the proposed project's stated goals. *