

**A. INTRODUCTION**

In accordance with the *City Environmental Quality Review (CEQR) Technical Manual*, this chapter presents and analyzes alternatives to the proposed project. Alternatives selected for consideration in an Environmental Impact Statement (EIS) generally include a No Action Alternative and alternatives that are feasible, considering the objectives and capabilities of the project sponsor, and have the potential to reduce, eliminate, or avoid significant adverse impacts of a proposed action while meeting some or all of the goals and objectives of the action. When a project would result in significant adverse impacts that cannot be mitigated, it is often CEQR practice to include an assessment of an alternative to the project that would result in no unmitigated impacts. Such alternatives may not be feasible in relation to the objectives and capabilities of the project sponsor, but can serve as an analytical tool that demonstrates there is no alternative meeting the goals of the proposed project without resulting in unmitigated impacts.

This chapter considers the following alternatives to the proposed project and compares those alternatives to the proposed project itself:

- A No Action Alternative, which assumes none of the proposed discretionary actions would occur, and the project site would continue to remain unoccupied;
- A No Unmitigated Significant Adverse Impacts Alternative, which considers a project program that would eliminate the proposed project's unmitigated significant adverse impacts on historic resources; and
- Development alternatives that were presented in 2008 by consulting parties during the Section 106 consultation process for the disposition of the project site by the United States Army-National Guard Bureau (NGB).

In addition to a comparative impact analysis, the alternatives in this chapter are assessed to determine to what extent they would meet the goals and objectives of the proposed project, which include: (1) redevelopment of the project site with light industrial and retail uses, consistent with the mandate of the Brooklyn Navy Yard Development Corporation (BNYDC) to create jobs, maximize revenue, develop underutilized areas within the Brooklyn Navy Yard industrial park, and modernize the industrial park's infrastructure; (2) provide an engine for substantial job growth to directly benefit the communities that surround the project site; (3) meet the City's strong demand for light industrial space; (4) develop a supermarket on the project site to fulfill a two-decade-old commitment to the surrounding community to address a serious public health issue by providing access to fresh food and produce; and (5) rehabilitate and/or reconstruct and adaptively reuse two historic structures.

The conclusion of the alternatives analysis is that, while some of the alternatives may reduce or eliminate the significant adverse impacts to historic and cultural resources, none of the

considered alternatives are feasible, considering the objectives and capabilities of BNYDC, nor do they meet the goals and objectives of the proposed project.

## **B. NO ACTION ALTERNATIVE**

### **DESCRIPTION OF THE NO ACTION ALTERNATIVE**

The No Action Alternative assumes that the property would not be transferred from the federal government to City ownership, that none of the other proposed discretionary actions would occur, and that the proposed project would not be implemented. Under this scenario, the project site would remain unoccupied, and the vacant buildings currently located on the federally owned site would continue to deteriorate. Residents and workers in the study area would continue to lack access to grocery stores carrying fresh food and produce, and there would be no creation of light industrial space on the project site. Therefore, the No Action Alternative would fail to meet any of the proposed project's goals. In addition, the No Action Alternative would not permit the full implementation of the Brooklyn Waterfront Greenway project, an independent City-sponsored project, as discussed more fully below. Under the No Action Alternative, the Greenway could not provide separate bike and pedestrian paths, which the widened sidewalks under the proposed project would accommodate.

The No Action Alternative has been used in other chapters of this EIS as the baseline against which impacts of the proposed project are measured. This section compares the potential effects of the No Action Alternative to those of the proposed project.

### **NO ACTION ALTERNATIVE COMPARED WITH THE PROPOSED PROJECT**

#### *LAND USE, ZONING, AND PUBLIC POLICY*

No changes to zoning or public policy are anticipated in the study area under the No Action Alternative. Under this alternative, the project site would remain unoccupied. The vacant buildings currently located on the site would continue to deteriorate and the site would remain overgrown. Residents and workers in the study area would continue to lack access to grocery stores carrying fresh food and produce, and there would be no creation of light industrial space for small businesses on the project site to complement the adjacent Brooklyn Navy Yard industrial park.

While the No Action Alternative does not achieve the beneficial land use changes that would result with the proposed project, neither the proposed project nor the No Action Alternative would result in significant adverse impacts related to land use, zoning, and public policy, as described in Chapter 2, "Land Use, Zoning, and Public Policy."

#### *OPEN SPACE*

The total amount of publicly accessible open space acreage in the ¼-mile study area is not expected to change under the No Action Alternative, while an additional 2,962 residents and 635 workers would be added to the study area from planned developments. These additional residents and workers would result in a decrease in the passive open space ratio for workers from 1.01 to 1.14. That ratio would continue to remain above the New York City Department of City Planning (DCP) guideline of 0.15.

While the passive open space ratio for workers would be higher (at 1.01) under the No Action Alternative than under the proposed project (at 0.88), neither the proposed project nor the No Action Alternative would result in significant adverse impacts related to open space. Under the proposed project, the ratio would still be well above the DCP guideline, as described in Chapter 3, “Open Space.”

### *SHADOWS*

Like the proposed project, the No Action Alternative would not result in significant adverse impacts related to shadows. Under this alternative, there would be no new development on the project site and, therefore, no new shadow increments on nearby sun-sensitive resources—the publicly accessible open spaces of the Farragut Houses complex, Commodore Barry Park, or the four mature trees on the project site that would be preserved as part of the project. Although the massing and height of new structures with the proposed project would cast new shadows, the brief duration and small extent of those shadows on nearby sun-sensitive resources would not cause a significant adverse shadows impact, as described in Chapter 4, “Shadows.”

### *HISTORIC AND CULTURAL RESOURCES*

#### *Archaeological Resources*

As there would be no subsurface excavation under the No Action Alternative, there would be no potential for any significant archaeological resources on the project site to be disturbed or impacted. As described in Chapter 5, “Historic and Cultural Resources,” with the proposed project, archaeological work would be undertaken to determine whether there are significant archaeological resources on the site. These investigations would include monitoring during all ground disturbing activities and additional archaeological investigations in the front and rear yards of the Officers’ Quarters after the existing buildings (other than Building B and the Timber Shed) are demolished. If no significant resources are encountered, there would be no adverse effects to archaeological resources with the proposed project. Should significant archaeological resources or human remains be encountered, the Memorandum of Agreement (MOA) with NGB would require the purchaser of the site to consult with the NGB and the New York State Historic Preservation Office (SHPO) to determine whether the resources may be avoided during construction and, if not, to identify appropriate mitigation measures to be implemented with the proposed project prior to and during construction, as discussed in Chapter 5, “Historic and Cultural Resources.”

#### *Architectural Resources*

Under the No Action Alternative, the vacant Admirals Row buildings would continue to deteriorate, resulting in further destabilization, potentially unsafe conditions, loss of historic integrity, and potential loss of individual historic buildings including Building B and the Timber Shed. In comparison, the proposed project would rehabilitate and/or reconstruct Building B and the Timber Shed and restore them to active use, as discussed in Chapter 5, “Historic and Cultural Resources.” The proposed project would result in the demolition of the remaining Admirals Row buildings, but it would involve the implementation of mitigation measures specified in the MOA with the NGB as discussed in greater detail in Chapter 5, “Historic and Cultural Resources,” including photodocumentation of the outbuildings on the project site, updating of the Historic American Buildings Survey (HABS) Level II documentation for the project site, architectural salvage from the Officers’ Quarters, and development of a site commemoration plan. None of

these measures would be implemented under the No Action Alternative, and thus that alternative could ultimately result in the loss of the historic integrity of individual structures and/or the project site as a whole without the implementation of appropriate measures to document their historic significance.

Unlike the proposed project, the No Action Alternative would not have the potential to result in direct, construction-related impacts on historic Brooklyn Navy Yard buildings within 90 feet of the project site. However, the proposed project would include the preparation and implementation of a Construction Protection Plan that would address the potential for construction-related impacts and, therefore, the proposed project would not have significant adverse construction-related impacts on nearby historic resources, as discussed in Chapter 5, “Historic and Cultural Resources.”

### *NATURAL RESOURCES*

Neither the No Action Alternative nor the proposed project would have significant adverse impacts on natural resources. In the No Action Alternative, vegetative composition and wildlife population density and diversity are expected to remain relatively unchanged from existing conditions. The natural succession of the vegetative community would continue at the existing rate and the project site would be expected to accommodate the current variety of wildlife at similar densities. Outside of natural succession, little change would be expected to occur to the ecological communities present on the project site.

While the proposed project would remove much of the existing vegetation on the site while retaining four large trees on Nassau Street to the extent possible, and would reduce the on-site habitat value for the animal species that currently use the site, the proposed project would not have a significant adverse impact on natural resources. As described in Chapter 6, “Natural Resources,” a planting plan to offset some of the vegetation and habitat disturbed during construction would be created as part of the project; that planting plan would consider habitat value for wildlife such as birds and butterflies.

### *HAZARDOUS MATERIALS*

In the No Action Alternative, the project site would remain unused and there would be no potential significant health risks at the project site from deconstruction, excavation, or construction. Although the proposed project may encounter previously unknown contaminated materials during building demolition and subsurface excavation, such activities would include appropriate health and safety and investigative/remedial measures that would precede or govern the demolition, renovation, and soil disturbance activities. Therefore, as discussed in Chapter 7, “Hazardous Materials,” neither the No Action Alternative nor the proposed project would result in significant adverse impacts related to hazardous materials.

### *WATER AND SEWER INFRASTRUCTURE*

Neither the No Action Alternative nor the proposed project would result in significant adverse impacts on the City’s water or sewer infrastructure. In the No Action Alternative, the buildings on the project site are expected to remain vacant. There would be no water demand or sanitary sewage generation and stormwater runoff amounts from the project site would remain about the same. Although the proposed project would result in an increased demand on the City’s water supply, wastewater, and stormwater conveyance and treatment infrastructure, the proposed project’s water demand and sewage generation would not have significant adverse impacts on

the City's water supply or sanitary sewage treatment system. In addition, the proposed project would design and implement certain Best Management Practices (BMPs), including the inclusion incorporation of a green roof, permeable pavement, and planted areas within the proposed parking lot, as described in Chapter 8, "Water and Sewer Infrastructure." ~~In addition, a BMP Concept Plan would developed~~ Further, in coordination with the New York City Department of Environmental Protection (DEP), the developer to be designated by BNYDC pursuant to an Request for Proposals would develop and implement to identify additional BMPs that would reduce stormwater discharge rates, such as blue roofs, on site rain gardens, infiltration swales, and stormwater detention, and BMPs that would reduce sanitary sewage volumes, such as gray water reuse and low flow fixtures, in combination with the green roof and permeable pavement, achieve an overall release rate of 0.25 cubic feet per second (cfs) or 10 percent of the allowable flow rate (whichever is greater). With the implementation incorporation of selected BMPs ~~and the implementation of the BMP Concept Plan~~, the increase in stormwater runoff would not be expected to have a significant adverse impact on the City's downstream combined sewer system or the Red Hook Wastewater Treatment Plant.

### *TRANSPORTATION*

As the project site would remain unoccupied in the No Action Alternative, it would not generate any travel demand. As discussed in Chapter 9, "Transportation," compared to the proposed project, the No Action Alternative would result in 979, 2,544, 2,206, and 2,498 fewer person trips in the vicinity of the project site during the weekday AM, weekday midday, weekday PM, Saturday midday, and Saturday PM peak hours, respectively. The No Action Alternative would also result in 213, 306, 345, and 350 fewer vehicle trips over the same peak hours, respectively, as compared to the proposed project.

In the No Action Alternative, there would be an increase in transportation demands from sites in the study area that will be developed by 2014 and from background growth reflecting general long-term trends and smaller developments.

### *Traffic*

As discussed in Chapter 9, "Transportation," under the No Action Alternative, traffic volumes in 2014 are expected to increase compared to existing volumes due to growth unrelated to the project site. As compared to existing conditions, there would not be any additional congested intersections, although operating conditions at some congested intersections would further deteriorate. At the intersection of Tillary Street and Flatbush Avenue Extension, there would be two additional congested approaches in the PM peak hour. At the intersection of Flushing Avenue and Clermont Avenue, there would also be two additional congested approaches in the PM peak hour. In addition, at the intersection of Sands Street and Navy Street, in the PM peak hour the northbound left-turn would deteriorate from LOS E to LOS F. All other congested approaches would remain at the same level of service in the No Action Alternative as they are under existing conditions.

Unlike the proposed project, the No Action Alternative would not result in significant adverse traffic impacts at two intersections in the AM peak hour and three intersections in the PM peak hour. Those project impacts could be fully mitigated as discussed in Chapter 14, "Mitigation."

As the project site would remain unoccupied in the No Action Alternative, the new driveways that would be created as part of the proposed project would not be provided. Furthermore, there would not be a new signal controlled intersection on Nassau Street in the No Action Alternative.

### *Goods Delivery*

There are no anticipated changes to the City's designated truck route network in the traffic study area under the No Action Alternative. In addition, there would continue to be no goods delivery activity associated with the project site. As compared to the proposed project, the No Action Alternative would result in 16, 18, and 6 fewer truck trips in the weekday AM, weekday midday, and weekday PM peak hours, respectively. (It should be noted that as with the No Action Alternative, the proposed project is not expected to generate any truck trips in the Saturday midday peak hour.)

### *Parking*

In the No Action Alternative, parking conditions would remain similar to existing conditions. Unlike the proposed project, a new accessory parking lot on the project site would not be created. Similarly, no parking spaces within the Brooklyn Navy Yard industrial park would be designated for use by the project site. The proposed project is expected to generate a peak parking demand of 174 and 276 vehicles spaces during the weekday midday and Saturday midday peak periods, respectively, for the on-site approximately 295-space accessory parking lot and 119 and 45 spaces during weekdays and Saturdays, respectively, for the 130 parking spaces provided in the Navy Yard industrial park for light industrial workers. Like the proposed project, the No Action Alternative would not result in any significant adverse parking impacts, as discussed in Chapter 9, "Transportation."

### *Subway*

There are no anticipated changes to the subway services in the vicinity of the project site under the No Action Alternative. The demand for subway transit within the study area would increase under the No Action Alternative compared to existing conditions due to both background growth and anticipated development in the area surrounding the project site. The No Action Alternative would result in 133, 211, 243, and 209 fewer subway trips in the weekday AM, weekday midday, weekday PM, and Saturday midday peak hours, respectively, as compared to the proposed project. While fewer trips at area subway stations are expected in the No Action Alternative, conditions would be substantially similar as compared to the proposed project and, therefore, there would be no significant adverse impacts with the No Action Alternative or the proposed project, as discussed in Chapter 9, "Transportation."

### *Bus*

As discussed in Chapter 9, "Transportation," there are no anticipated changes to public bus services in the vicinity of the project site under the No Action Alternative. The demand for bus transit within the study area would increase under the No Action Alternative compared to existing conditions due to both background growth and anticipated development in the area surrounding the project site. Overall, the projected increase in ridership could be accommodated by existing capacity on the three bus routes serving the project site.

The No Action Alternative would result in 195, 339, 412, and 406 fewer bus only trips in the weekday AM, weekday midday, weekday PM, and Saturday midday peak hours, respectively, as compared to the proposed project. Similarly, unlike the proposed project, the No Action Alternative would not result in any new subway-bus transfers or trips on the subway shuttle bus operated by the BNYDC.

The incremental increase in bus utilization that would occur with the proposed project would not occur with the No Action Alternative. This includes the B62 bus route; unlike conditions with the proposed project, in which this route would operate over capacity through the peak load point in the peak northbound direction in the PM peak hour, this route would operate under capacity in the No Action Alternative. Unlike the proposed project, the No Action Alternative would not result in significant adverse impacts on the B62 northbound line. The proposed project's impacts could be fully mitigated as discussed in Chapter 14, "Mitigation."

#### *Pedestrians*

Under the No Action Alternative, pedestrian volumes in the vicinity of the project site would not change substantially compared to existing conditions. None of the surrounding new developments would generate significant increases in pedestrian activity at the analyzed locations.

The No Action Alternative would result in 714, 2,236, 1,738, and 1,948 fewer walk trips (including trips by transit modes that include walk component) in the weekday AM, weekday midday, weekday PM, and Saturday midday peak hours, respectively, as compared to the proposed project. Unlike the proposed project, in which some analyzed sidewalk elements operating conditions would change from LOS A to LOS B or LOS C, in the No Action Alternative, all analyzed sidewalks, crosswalks, and street corners would operate at LOS A in all analyzed peak hours. Like the proposed project, the No Action Alternative would not result in any significant adverse pedestrian impacts, as discussed in Chapter 9, "Transportation."

#### *Bicycle Facilities*

According to the City's NYC Cycling Map 2010 and plans for the Brooklyn Waterfront Greenway route, a new off-street bicycle and pedestrian path will be implemented along Nassau Street and Navy Street in the immediate vicinity of the project site. This path will connect to the existing northbound bike lanes on Carlton Ave and the southbound lane on Cumberland Street, and will continue north on Navy Street and run westbound on York Street and eastbound on Front Street.

However, under the No Action Alternative, the existing wall along the project site's perimeter would remain in place, thereby diminishing the ability of the Brooklyn Waterfront Greenway to include protected bike lanes in the vicinity of the project site. Using the existing street right-of-way, under the No Action Alternative, the existing on-street bike lanes could be maintained or a constricted, less functional off-street shared path for bicyclists and pedestrians could be provided. In comparison, under the proposed project, the project site would provide sufficient space for widened sidewalks to accommodate the implementation of the greenway with protected bike-only lanes along the site's frontage separated from vehicular traffic and a separate pedestrian sidewalk.

#### *AIR QUALITY*

As described in Chapter 10, "Air Quality," like the proposed project, the No Action Alternative would not have a significant adverse impact on air quality, either from mobile or stationary sources. As the project site would remain unoccupied under the No Action Alternative, carbon monoxide and particulate matter levels—accounting for planned developments in the study area and general background growth—would be less than with the proposed project. However, as described in Chapter 10, "Air Quality," the mobile source analysis indicated that mobile sources

## **Admirals Row Plaza**

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with the proposed project would not result in a significant adverse impact on air quality. To ensure there are no significant adverse impacts on air quality from the proposed project's heat and hot water systems, restrictions would be placed on the fuel type and exhaust stack locations of the heat and hot water system that would serve the proposed supermarket. There would be no new heat and hot water systems or new sensitive uses under the No Action Alternative. Therefore, like the proposed project, the No Action Alternative would not result in impacts on air quality from stationary emission sources.

### ***NOISE***

As described in Chapter 11, "Noise," under the No Action Alternative, like under the proposed project, the increase in Leq(1) noise levels would be less than 1 dBA for all analysis periods at the two receptor sites—on Navy Street between Sands Street and Nassau Street and on Nassau Street between Navy Street and N. Elliott Place. Changes of this magnitude would be barely perceptible and insignificant, and would be below the CEQR threshold for a significant adverse impact. In terms of CEQR Noise Exposure Guidelines, noise levels at the two receptor sites would remain in the "marginally unacceptable" category under both the No Action Alternative and the proposed project. Under the project, the proposed buildings' façades would be designed to provide a composite Outdoor-Indoor Transmission Class rating greater than or equal to CEQR attenuation requirements. Neither the No Action Alternative nor the proposed project would have significant adverse noise impacts.

### ***NEIGHBORHOOD CHARACTER***

As described in Chapter 12, "Neighborhood Character," the No Action Alternative, like the proposed project, would not result in significant adverse impacts on neighborhood character. However, the vacant buildings currently located on the site would continue to deteriorate and the site would remain overgrown.

Although the proposed project would result in significant adverse impacts on historic resources, traffic conditions, and bus service, it would not result in a significant adverse impact on neighborhood character, because (as discussed in Chapter 12, "Neighborhood Character") it would not substantially affect the neighborhood's overall historic character, and traffic conditions and bus service are not considered critical to the character of the neighborhood. The No Action Alternative would not result in the historic resources, traffic, and bus service impacts that would occur under the proposed project.

However, with the No Action Alternative, the project site would not be transformed from an overgrown and unoccupied site to a mixed-use development that would include a supermarket in an area that the City has determined to be underserved by grocery stores. In addition, with this alternative the project site would remain visually and physically separated from the surrounding area by walls, fences, and vegetation.

### ***CONSTRUCTION***

As described in Chapter 13, "Construction Impacts," there would be no construction associated with the No Action Alternative and, therefore, it would not result in any short-term construction disruptions to the surrounding area. The No Action Alternative would also not result in the significant adverse impacts on historic resources that would occur under the proposed project or the potential construction-period hazardous materials impacts that would be addressed with health and safety and investigative/remedial measures under the proposed project. Neither this



alternative nor the proposed project would result in significant construction-related adverse impacts on land use, community facilities, open space, natural resources, transportation, air quality, or noise.

However, the No Action Alternative would not result in the direct, positive socioeconomic benefits that would occur with the proposed project from expenditures on labor, materials, and services, nor the indirect socioeconomic benefits created by expenditures by material suppliers, construction workers, and others involved in the project. Further, the No Action Alternative would not contribute to increased tax revenues for the city and state, including those from personal income taxes.

### **C. NO UNMITIGATED SIGNIFICANT ADVERSE IMPACTS ALTERNATIVE**

As discussed in Chapter 5, “Historic and Cultural Resources,” the proposed project would demolish all structures on the project site except for Building B and the Timber Shed, which are proposed for rehabilitation and/or reconstruction and reuse. The project would, therefore, result in significant adverse impacts on historic resources. Although mitigation measures would be undertaken, the demolition of these structures would be considered an impact that cannot be fully mitigated. Measures to partially mitigate the adverse impacts have been developed and are described in greater detail in Chapter 14, “Mitigation.” These measures include those developed by NGB through the Section 106 consultation process that include the preservation of mature trees along Nassau Street where possible; photo-documentation of the site’s outbuildings and update of the 2005 Historic American Buildings Survey Level II documentation; architectural salvage; preparation and implementation of a site commemoration plan; and additional archaeological work to determine whether there are significant (State and/or National Register-eligible) archaeological resources on the site. Further mitigation to be undertaken by BNYDC and the developer to be designated by BNYDC pursuant to an RFP includes designing the proposed development so that it respects the height and materials of Building B and the Timber Shed and developing and implementing a Construction Protection Plan to protect Building B and the Timber Shed during demolition of other existing structures, their rehabilitation and/or reconstruction, and construction of the new buildings on the site. However, these measures would not fully mitigate the significant adverse impacts occasioned by the loss of the historic structures. Therefore, in accordance with the guidance of the *CEQR Technical Manual*, an alternative that would allow for the full mitigation or avoidance of these impacts is considered herein. This alternative, which would preclude the development of the site with new buildings, would also reduce or eliminate the adverse traffic and bus impacts that would occur with the proposed project, all of which could be mitigated, and would not result in any other impacts.

Complete avoidance of the significant adverse impacts on historic resources would require the retention of all historic structures on the project site including the Timber Shed and Officers’ Quarters, which are the primary contributing features of the S/NR-eligible historic district (and also individually eligible except for Buildings C, which has partially collapsed, and F, which does not possess integrity) and the ancillary structures (many of which have also collapsed) and landscape features that contribute to the S/NR-eligible district. This would preclude any redevelopment of the project site with new buildings, as the contributing elements of the district take up almost the entirety of the site. As described below, the goals and objectives of the proposed project could not be achieved through adaptive reuse of the existing structures, because their configurations are not suited to commercial reuse, and particularly as a number of the

structures have collapsed (see Chapter 5, “Historic and Cultural Resources”). Furthermore, this alternative would be financially impracticable, as rehabilitation costs would be tens of millions of dollars while the ability to use the site to generate revenue would be almost, if not entirely, nonexistent.

It is theoretically possible that the impacts could be mitigated to below the level of significance through preservation of just the Officers’ Quarters and the Timber Shed. Therefore, the No Unmitigated Significant Impacts Alternative focuses on the preservation of those structures. This alternative would greatly reduce the utility of the site for redevelopment for light industrial, supermarket, and retail uses by severely restricting and/or altogether precluding the ability to locate these uses on the site, as described in more detail below. This alternative would prevent the project from fulfilling a number of significant project objectives: locating a supermarket in an area that is currently underserved by supermarkets; allowing BNYDC to meet its industrial mission through the creation of new light industrial space; and generating economic activity and new jobs.

As discussed in Chapter 5, “Historic and Cultural Resources,” the retention and rehabilitation of all of the Officers’ Quarters would cost at least \$20 million and as much as \$70 million or more.<sup>1</sup> These costs would be in addition to the costs of rehabilitating and/or reconstructing the Timber Shed, to which BNYDC is already committed. The rehabilitation of Building B, as contemplated with the proposed project, would preserve the oldest and largest of the Admirals Row residences and the residence that has the highest level of surviving interior detail. Reconstruction and reuse of the Timber Shed, as contemplated with the proposed project, would retain the earliest structure on the Admirals Row site and the only surviving example of this type of structure at a Naval facility in the country.<sup>2</sup> It is not practicable to assume that a purchaser or developer of the property would have funds of this magnitude to restore buildings for which there would be little or no reuse potential, as discussed below. Given the projected costs, retention of all other Officers’ Quarters structures with the No Unmitigated Significant Impacts Alternative would not be feasible, considering the objectives and capabilities of BNYDC.

Preservation of all of the Officers’ Quarters would also preclude realization of the goals and objectives of the proposed project, as it would make redevelopment of the project site financially impracticable, as well as for the following reasons.

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<sup>1</sup> As presented by various consultants, the cost could exceed \$20 million by as much as an additional \$10 to \$30-50 million. Costs included in the August 20, 2008 National Historic Preservation Act Consulting Parties Meeting Presentation, p. 8. Jan Hird Pokorny: \$30 million; Greg Pillori Associates: \$50 to \$70 million; and TDX Construction: \$50 to \$60 million.

<sup>2</sup> Costs prepared in December 2010 indicate that structural repairs to the Timber Shed, including sitework, foundation, structure, and exterior enclosure work would cost at least \$1.6 million. These costs do not include other costs associated with the rehabilitation of the building, including architectural considerations, finishes, roofing, doors and windows, circulation elements (stairs and elevators) mechanicals, or asbestos and lead abatement. Therefore, the retention and rehabilitation or reconstruction of Building B, estimated to cost between \$2.5 to \$3.85 million (in 2008 dollars), and those costs associated with the stabilization and rehabilitation or reconstruction of the Timber Shed would be a considerable expenditure.

## **LOCATIONAL AND SPACE NEEDS OF SUPERMARKET AND LIGHT INDUSTRIAL SPACE**

The proposed supermarket's large square footprint is informed by its operations in terms of the layout of food aisles and check-out areas. The proposed location of the supermarket is at the east end of Nassau Street. This is due to factors including its large footprint and limiting factors that preclude its placement on Navy Street, including the presence of the Sands Street gate and historic gatehouses, the need for an entrance to the project from Navy Street, and the presence of the Timber Shed. Moreover, the location of the supermarket and the industrial space at the east end of the site has been specifically designed so that the loading docks of the supermarket would be accessible from within the adjacent Brooklyn Navy Yard industrial park. This would maximize safety on the site by separating truck loading from pedestrians and vehicles and eliminating the need for delivery trucks maneuvering directly on Nassau Street and Navy Street. Access to the industrial space would also be from within the industrial park, providing security for these tenants within a perimeter security fence and allowing these tenants to become part of the industrial park and have the benefit of the security measures extended by BNYDC to its tenants. It would also allow the industrial tenants to use dedicated parking facilities within the Brooklyn Navy Yard industrial park.

Buildings E-F-G, and I fully overlap with the location of the proposed supermarket/light industrial building. Building D is partially located within the footprint of the supermarket. The size and configuration of the Officers' Quarters structures effectively precludes their use for industrial and supermarket uses under the No Unmitigated Significant Impacts Alternative. Thus, preserving all of the Officers' Quarters along with the Timber Shed would not allow BNYDC to achieve the proposed project's principal goals of developing a supermarket in an underserved area and providing light industrial space in line with BNYDC's mission.

## **LOCATIONAL AND SPACE NEEDS OF RETAIL SPACE**

DCP has indicated a strong preference for creation of a streetwall along both Nassau and Navy Streets, to allow for direct retail access from the sidewalk, as well as activation of street life. With the retail placed along the sidewalks on Navy Street and Nassau Street in accordance with this preference, Buildings C, H, K, and L are located within the footprint of the proposed new retail building on Nassau Street, which would be situated between Building B (one of the oldest and most intact of the Officers' Quarters) and the Timber Shed (a unique building type in the country). Placing a new retail building behind the existing Officers' Quarters rather than along Nassau Street would eliminate the visibility of the location from the street and severely limit its desirability for prospective tenants, making development of such a building impracticable. It also would not be practicable to use any of the Officers' Quarters for retail use. Typically, retail requires open spaces (with widely spaced columns) to accommodate rows of displays as well as circulation aisles providing lanes of travel for shoppers and shopping carts. The existing buildings have small footprints, small rooms defined by load bearing walls, no elevators, and have their first floors raised above street level with access provided by stoops. The first floor elevation and lack of elevators pose additional issues with respect to accessibility requirements of the Americans with Disabilities Act.

## **PRACTICABILITY OF ADAPTIVE REUSE**

The structural instability of the Officers' Quarters also affects the feasibility of their retention and reuse under the No Unmitigated Significant Impacts Alternative. Structural evaluations

performed in 2008 indicated that Buildings C and F are not structurally sound (and Building C subsequently partially collapsed in June 2009) and thus rehabilitation costs for these buildings would be high. It was also noted that Buildings C and F share party walls with other structures, which poses substantial issues for their potential retention and rehabilitation, and thus also precludes the potential reuse and rehabilitation of Building H (with which Building C is paired), and Buildings E and G (which are connected to Building F).

As described above, the size and configuration of the Officers' Quarters effectively precludes their use for industrial, supermarket, and most retail (if not all) uses under the No Unmitigated Significant Impacts Alternative. Building B's larger footprint allows for the greatest flexibility for commercial reuse, compared to the other Officers' Quarters structures. The new proposed use (community facility space) proposed for Building B creates a viable use for a building of its size. The Timber Shed lends itself to use as retail space due to its open interior floor plan of approximately 6,180 square feet. The reuse of the Timber Shed for retail space would contribute to the streetwall created on Navy Street and Nassau Street.

In sum, the retention of the Officers' Quarters as well as the Timber Shed under the No Unmitigated Significant Impacts Alternative would be financially impracticable and would not allow the project to meet its goals and objectives. Therefore, it is not feasible to retain other Officers' Quarters buildings as part of the proposed project and fully mitigate the significant impacts resulting from demolition of historic structures on the project site, nor would such a modification to the project enable it to achieve its principal goals and objectives.

### **D. CLINTON HILL LANDMARKS COMMITTEE/BRENT PORTER ALTERNATIVE**

The Society of Clinton Hill Landmarks Committee, in coordination with architect Brent Porter, proposed—as part of NGB's ~~ongoing~~ Section 106 consultation process—an alternative to the 2008 conceptual development plan that would retain the Timber Shed and all of the Officers' Quarters. The garages and other structures located on the site would be demolished and, as these are contributing to the S/NR-eligible district, their demolition would constitute an adverse impact on the historic character of the project site, although to a lesser degree than the proposed project, since the alternative includes the retention of the Timber Shed and all the Officers' Quarters. Therefore, it is theoretically possible that the impacts could be mitigated to below the level of significance through preservation of the Officers' Quarters and the Timber Shed.

This alternative proposes a new, modified V-shaped structure that is described to contain a grocery market and would be built behind the existing Officers' Quarters, with parking provided along Navy Street behind the Timber Shed and around the north and east perimeters of the new building.<sup>1</sup> As noted in Chapter 5, "Historic and Cultural Resources," the Society of Clinton Hill Landmarks Committee did not provide costs for this alternative. NGB estimated the cost for the alternative to exceed \$20 million—the estimated cost of the rehabilitation of all of the Officers'

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<sup>1</sup> Text of the presentation is located on NGB's website (<http://www.nan.usace.army.mil/business/buslinks/admiral/pdf/aug08/clinton.pdf>) and a visualization of the alternative is contained in Appendix E of Tetra Tech's Alternatives Analysis of Admirals Row, October 2008. It should be noted that the visualization contains a plan and birds eye view and the bird's eye view contains an extensive two-story addition to the Timber Shed extending north to the Sands Street gate, while the plan shows parking behind the Timber Shed.

Quarters as identified in the 2008 Alternatives Analysis. As described above, this cost could in fact be as much as \$70 million. These costs are exclusive of any additional costs for the rehabilitation and/or reconstruction of the Timber Shed and the new construction to be developed on the site.

As described by Brent Porter, the new building would consist of two “big boxes” for a grocery market joined by a V-shaped connecting structure.<sup>1</sup> Rough measurements indicate that each “big box” would contain approximately 20,000 square feet. If constructed as a one-story structure, the building would not contain space for industrial space or retail space. The alternative proposal indicates that the Timber Shed could be preserved and used for retail uses and social services. The Officers’ Quarters are described as being usable for smaller scale shopping at the raised first floor level with community uses on the upper floors.

While the retention and reuse of the Timber Shed is practicable due to its open floor plan and larger floor plate that lends itself to retail use, the retention and reuse of all of the Officers’ Quarters is not practicable. As described in Section C, the costs would be extraordinary and not supported by the limited reuse potential that is suggested in the proposal. The proposed supermarket would not be provided in the required large, square configuration needed for a full-service, large-format supermarket. The supermarket would also be hidden from public view. Both aspects would substantially detract from the desirability of the site from a large grocery store operator’s perspective. This alternative also would not include light industrial space, which is one of the principal goals of the proposed project. In addition, in the visualization where parking is provided behind the Timber Shed, the streetwall would remain open on Navy Street between the Timber Shed and the Sands Street gate, contrary to DCP’s principles to have streetwalls on Navy Street and Nassau Street.

Thus, this alternative would require expenditures of at least \$20 million to as much as \$70 million to rehabilitate all the Officers’ Quarters, which would render the alternative financially unviable. It would also not provide industrial space to meet BNYDC’s industrial mission, and would provide for a supermarket of a configuration and siting that would be problematic from an operational and sales perspective. As such, this alternative would not fully meet the goals and objectives of the proposed project and would not be feasible considering the objectives and capabilities of BNYDC.

With a smaller program than would be provided under the proposed project, this alternative would likely reduce or eliminate the significant adverse traffic and bus impacts that would occur with the proposed project, all of which could be mitigated. Effects on land use, zoning, and public policy, open space, shadows, natural resources, hazardous materials, water and sewer infrastructure, air quality, noise, neighborhood character, and construction would likely be similar to those of the proposed project, since this alternative would provide supermarket and retail uses, construct new buildings, and rehabilitate and/or reconstruct existing buildings.

## **E. MUNICIPAL ART SOCIETY ALTERNATIVES**

The Municipal Art Society (MAS) presented 11 alternative development proposals during the NGB’s Section 106 consultation process. All the proposals included the demolition of the structures on the rear of the property, including the garages behind the Officers’ Quarters,

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<sup>1</sup> No other uses except the grocery market are described in the text of the presentation. In addition, no floor area amounts are provided.

Building J, Building 429, Building 198 (which was demolished in Spring 2011 by the NGB), and the tennis court and bandstand, which contribute to the S/NR-eligible district. Therefore, any of the 11 proposals would result in adverse impacts on the historic character of the project site, although in varying degrees dependent on how many of the primary contributing structures would be retained. All of the alternative development proposals would result in fewer historic resources impacts with respect to the Officers' Quarters, as the proposals would retain five or more of the Officers' Quarters. For the alternative proposals that retain all the Officers' Quarters and the Timber Shed (of which there are three, described in greater detail below), it is theoretically possible that the impacts could be mitigated to below the level of significance as the primary contributing structures—the Officers' Quarters and the Timber Shed—would be preserved. The alternative proposals that would result in the demolition of one or more of the Officers' Quarters or the Timber Shed would constitute a significant adverse impact on the historic character of the project site, with the retention of the remaining Officers' Quarters (and the Timber Shed in all but one of the alternative proposals) constituting partial mitigation for the significant adverse impact. In comparison, the proposed project would only retain Building B among the Officers' Quarters and the Timber Shed. However, as also described below, some of the MAS alternative development proposals would have significant adverse impacts on the Timber Shed (and in one case would eliminate the Timber Shed), which would not occur with the proposed project.

All of the proposals include a supermarket and industrial space. Nine of the proposals include retail space. Of the 11 proposals, three would retain the Timber Shed and all of the Officers' Quarters with new structures and parking located behind them. Eight of the MAS proposals would retain most of these buildings (in all alternatives except one, Buildings B, D, and the Timber Shed would be retained) with structures and parking taking the place of buildings that would be demolished (these included removal of varying combinations of Buildings K-L, H-C, E-F-G, and I, as well as the Timber Shed in one scheme). All of the proposals would retain either Buildings H-C or Buildings E-F-G or both groups of buildings. Reuse and rehabilitation of these buildings is problematic due to the partial collapse of Building C and the lack of structural stability of Building F. These two buildings share party walls with other structures, which poses substantial issues for their potential retention and rehabilitation, and thus also precludes the potential reuse and rehabilitation of Building H, (with which Building C is paired) and Buildings E and G (which are connected to Building F).

MAS's presentation to the NGB at the August 20, 2008 Section 106 consulting parties meeting included five schemes (Schemes 1-5) and six alternatives (Alternatives A-F). The alternatives were either variations on the proposed schemes or presented other redevelopment options.

The five schemes and six alternatives presented by MAS are summarized below.

Though none of the proposals would provide more square footage than the proposed project, those with comparable developable square footage—such as Scheme 2 and Alternatives C and E, which would provide approximately 7,804, 1,594, and 9,894 square feet less, respectively, than the proposed project—would result in similar or greater significant adverse impacts on traffic and bus service. It would be expected that, like the proposed project's impacts, the transportation impacts of the three proposals could be mitigated. Effects on land use, zoning, and public policy, open space, shadows, natural resources, hazardous materials, water and sewer infrastructure, air quality, noise, neighborhood character, and construction would likely be generally similar to those of the proposed project, since these three proposals would provide

supermarket, industrial, and retail uses, construct new buildings, and rehabilitate and/or reconstruct existing buildings.

The eight proposals that would provide less square footage than the proposed project could likely reduce or eliminate the adverse traffic and bus impacts that would occur with the proposed project, all of which could be mitigated. Effects on land use, zoning, and public policy, open space, shadows, natural resources, hazardous materials, water and sewer infrastructure, air quality, noise, neighborhood character, and construction would likely be similar to those of the proposed project, since these proposals would provide supermarket, industrial, and in most cases retail uses, construct new buildings, and rehabilitate and/or reconstruct existing buildings.

Each scheme and alternative is discussed below.

## **SCHEMES 1-5**

### *SCHEME 1*

Scheme 1 proposes a total of 274,000 square feet and would retain the Timber Shed and all of the Officers' Quarters. Scheme 1 assumes that 45,490 square feet of retail would be provided in the Timber Shed and Officers' Quarters, a four-story parking garage would be built, and industrial space and a supermarket would be contained in one multi-story structure. The supermarket would have approximately 53,900 square feet. 174,900 square feet of industrial space would be provided. The supermarket/industrial building and parking garage would be positioned at the rear of the site, with the supermarket at the northwest corner on Navy Street and the parking garage located behind Buildings, B, D, E-F-G, and I.

The reuse of the Officers' Quarters for retail use is not practicable due to their configuration, including small interior spaces and the elevation of the floor above street level. Buildings H-C and E-F-G would be retained under this proposal, but as described above, Building C has partially collapsed and Building F is not structurally sound. The supermarket would be obscured from Nassau Street, the principal thoroughfare through the area. This would limit the likelihood of finding tenant grocers, who would expect to have the supermarket prominently visible from the street. Since all of the Officers' Quarters would be retained and reused, the cost for the rehabilitation of all of these buildings would be at least \$20 million in 2008 dollars.<sup>1</sup> In addition, this alternative would include structured parking, which would add substantially to its cost as compared to the surface parking proposed for the proposed project.

### *SCHEME 2*

Scheme 2 is similar to Scheme 1 in terms of the retention of the Timber Shed and all of the Officers' Quarters. Retail would also be provided in the existing buildings on the site. Scheme 2 proposes a total of 285,490 square feet. This scheme differs from Scheme 1 in that the locations of the supermarket/industrial building and parking garage are reversed, with the supermarket/industrial building to be located at the east end of the site behind Buildings B, D, E-F-G, and I and the parking garage proposed along Navy Street at the northwest corner of the site. The proposed floor area differs for the supermarket and the industrial space, with Scheme 2

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<sup>1</sup> The cost of the rehabilitation of Building B, which BNYDC would rehabilitate, was estimated at \$2.5 million in 2008.

providing approximately 700 square feet less of supermarket space and 12,000 square feet more of industrial space.

The reuse of the Officers' Quarters for retail use is not practicable due to their configuration, including small interior spaces and the elevation of the floor above street level. Buildings H-C and E-F-G would be retained under this proposal, but as described above, Building C has partially collapsed and Building F is not structurally sound. The supermarket would be obscured from both Nassau Street and Navy Street. This would limit the likelihood of finding tenant grocers, who would expect to have the supermarket prominently visible from the street. Since all of the Officers' Quarters would be retained and reused, the cost for the rehabilitation of all of these buildings would be at least \$20 million in 2008 dollars, along with the substantial additional costs of structured parking.

### *SCHEME 3*

Scheme 3 proposes a total of 276,809 square feet. It would retain the Timber Shed and Buildings B, D, E-F-G, and I and provide for an approximately 58,300-square-foot supermarket. Buildings K-L and H-C would be demolished. Parking in Scheme 3 would be contained beneath the supermarket, to be built contiguous with the Timber Shed to the east, and also provided as surface parking. Industrial space would be provided in a six-story building on Navy Street at the northwest corner of the site. A new multi-story retail building would be constructed directly behind Buildings B, D, E-F-G to contain approximately 40,200 square feet of retail. A projected use for Buildings B, D, E-F-G is not indicated, though MAS's online presentation states that the new retail building and existing buildings would "create a cluster of publicly accessible buildings used for retail, small business operations, or many other uses."<sup>1</sup>

Construction of a multi-story retail building directly behind the Officers' Quarters would provide retail spaces that would have limited or no visibility from the street and would not be easily accessible to the pedestrian. Therefore, finding tenants to occupy such retail would be difficult. Buildings E-F-G would be retained under this alternative, but, as described above, Building F is not structurally sound.

In addition to the demolition of four Officers' Quarters and the other contributing ancillary buildings on the site, this scheme would result in significant adverse impacts on the Timber Shed. As described in Chapter 5, "Historic and Cultural Resources," the Timber Shed is a unique and highly significant structure. Scheme 3 would construct an elevated supermarket with enclosed parking contiguous to the east façade of the Timber Shed. Construction of the elevated supermarket contiguous to the Timber Shed would have a significant adverse contextual impact as it would fully screen the east side of the Timber Shed from view. The Timber Shed would no longer be a freestanding structure and this scheme could also potentially require substantial alterations to the building's east façade to connect it to the supermarket. Rehabilitation of Buildings B, D, E-F-G and I would cost at least \$11.8 million in 2008 dollars, along with the substantial additional costs of structured parking.

### *SCHEME 4*

Scheme 4 proposes a total of 257,470 square feet. It retains the Timber Shed and Buildings B, D, E-F-G and would involve the demolition of Buildings K-L, H-C and I. It is similar to Scheme 3

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<sup>1</sup> <http://mas.org/preservation/admiralsrow/>



in that a new, multi-story retail building would be located behind the Officers' Quarters to remain. Like Scheme 3, the new retail building and existing buildings would "create a cluster of publicly accessible buildings used for retail, small business operations, or many other uses."<sup>1</sup> The retail building would contain approximately 48,300 square feet. A six-story industrial building would also be built, although in Scheme 4 it would be built in the location of Building I on Nassau Street. An approximately 60,200-square-foot supermarket would be built on Navy Street at the northwest corner of the site. Green space would take the place of Buildings K-L and H-C. The retail and industrial building would be connected to a four-story parking garage, to be located behind the new retail building.

Construction of a multi-story retail building directly behind the Officers' Quarters would provide retail spaces that would have limited or no visibility from the street and would not be easily accessible to the pedestrian or desirable to potential tenants. Inclusion of an open space to take the place of Buildings K-L and H-C would not provide a streetwall on Nassau Street. Buildings E-F-G would be retained under this proposal, but as described above, Building F is not structurally sound.

Scheme 4 would require at least \$9.6 million (in 2008 dollars) to rehabilitate Buildings B, D and E-F-G, along with the substantial additional costs of structured parking.

#### *SCHEME 5*

Scheme 5 proposes a total of 258,275 square feet and the retention of the Timber Shed and Officers' Quarters K-L, H-C, B and D. In this scenario, the supermarket would be located on Nassau Street at the east end of the site, in approximately the same location as the proposed project. This proposal would involve the demolition of Buildings E-F-G and I. The supermarket would contain approximately 50,500 square feet of space. Parking for the supermarket would be either provided beneath the supermarket or on its roof, with additional parking for the industrial building—to be located on Navy Street in a six-story structure at the northwest corner of the site—provided as surface parking. Approximately 31,500 square feet of retail space would be provided in a multi-story building directly behind Buildings K-L and H-C. Like Schemes 3 and 4, the new retail building and existing buildings would "create a cluster of publicly accessible buildings used for retail, small business operations, or many other uses."<sup>2</sup>

Construction of a multi-story retail building directly behind the Officers' Quarters would provide retail spaces that would have limited or no visibility from the street and would not be easily accessible to the pedestrian. Buildings H-C would be retained under this alternative, but as described above, Building C has partially collapsed.

Scheme 5 would require at least \$12.6 million (in 2008 dollars) to rehabilitate Buildings K-L, H-C, B and D, along with the substantial additional costs of structured parking.

#### **ALTERNATIVES A-F**

Alternatives A, B, C, and E present variations of the developments proposed in Schemes 1, 3, 4, and 5, though with differences in site plan and proposed developable floor area. Alternatives D and F propose other development options.

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<sup>1</sup> <http://mas.org/preservation/admiralsrow/>

<sup>2</sup> <http://mas.org/preservation/admiralsrow/>

### *ALTERNATIVE A*

Alternative A is a variation of Scheme 3 whereby parking is reconfigured on the site (either rooftop parking on the supermarket and at-grade surface parking, or a structured parking garage is proposed).<sup>1</sup> Of the total 318,237 square feet of development proposed, 59,370 square feet would be contained in the parking structure, thereby providing 258,867 square feet of developable floor area. An approximately 59,370-square-foot supermarket would be provided. Approximately 26,700 square feet of retail space would be provided in a new multi-story building directly behind Buildings B, D, and E-F-G. The proposed uses for the Timber Shed and Buildings B, D, and E-F-G are not specified.

Construction of a multi-story retail building directly behind the Officers' Quarters would provide retail spaces that would have limited or no visibility from the street and would not be easily accessible to the pedestrian. Buildings E-F-G would be retained under this proposal, but as described above, Building F is not structurally sound.

In addition to the demolition of four Officers' Quarters and the other contributing ancillary buildings on the site, Alternative A would result in significant adverse impacts on the Timber Shed. As described in Chapter 5, "Historic and Cultural Resources," the Timber Shed is a unique and highly significant structure. Alternative A would construct a supermarket contiguous to the east façade of the Timber Shed. Construction of the supermarket contiguous to the Timber Shed would have a significant adverse contextual impact as it would fully screen the east side of the Timber Shed from view. The Timber Shed would no longer be a freestanding structure and this scheme could also potentially require substantial alterations to the building's east façade to connect it to the supermarket. Rehabilitation of Buildings, B, D, E-F-G, and I would cost at least \$11.8 million in 2008 dollars, along with the substantial additional costs of structured parking.

### *ALTERNATIVE B*

Alternative B is a variation of Scheme 4. Instead of providing for a green space east of the Timber Shed in the locations of Buildings K-L and H-C, surface parking would be provided in addition to the structured parking garage. Of the 292,896 square feet of development proposed, 43,600 would be contained in the parking structure, thereby providing 249,296 square feet of developable floor area.<sup>2</sup> A 60,200-square-foot supermarket would be provided. Approximately 32,250 square feet of retail space would be provided in a new multi-story building directly behind Buildings B, D, and E-F-G. The proposed uses for Buildings B, D, and E-F-G are not specified.

Construction of a multi-story retail building directly behind the Officers' Quarters would provide retail spaces that would have limited or no visibility from the street and would not be easily accessible to the pedestrian or desirable to potential tenants. Inclusion of a surface parking lot to take the place of Buildings K-L and H-C would not provide a streetwall on Nassau Street. Under this proposal Buildings E-F-G would be retained, but as described above, Building F is not structurally sound.

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<sup>1</sup> The site plan for Alternative A shows rooftop parking on the supermarket and surface parking. The massing diagram for Alternative A indicates there would be a 59,370-square-foot parking structure.

<sup>2</sup> The floor areas per use shown for Alternative B do not add up to the total floor area proposed. The sum of the floor areas proposed results in a total of 301,536 square feet. It is not clear if the error is in the addition or the depiction of floor area for one of the uses.

Alternative B would require at least \$9.6 million (in 2008 dollars) to rehabilitate Buildings B, D and E-F-G, along with the substantial additional costs of structured parking.

#### *ALTERNATIVE C*

Alternative C is a variation of Scheme 5. It would provide a total of approximately 291,700 square feet, including a 49,800- square-foot supermarket. Alternative C would provide for a retail building of approximately 32,250 square feet with a larger footprint than Scheme 5—the building would extend behind Buildings K-L, H-C, B, and D (in Scheme 5 the retail building is not as long and would extend only behind Buildings K-L and H-C). The retail building would have approximately 600 square feet more of retail space than Scheme 5. Surface parking would be provided. The proposed uses for Buildings K-L, H-C, B, and D are not specified.

Construction of a multi-story retail building directly behind the Officers' Quarters would provide retail spaces that would have limited or no visibility from the street and would not be easily accessible to the pedestrian or desirable to potential tenants. Buildings H-C would be retained under this proposal, but as described above, Building C has partially collapsed.

Alternative C would require at least \$12.6 million (in 2008 dollars) to rehabilitate Buildings K-L, H-C, B, and D.

#### *ALTERNATIVE D*

Alternative D would remove Buildings H, C, and I and replace these structures with parking. Alternative D would place an approximately 54,300-square-foot supermarket behind Buildings B, D, and E-F-G. A four-story industrial building is proposed at the northwest corner of the site. Approximately 34,000 square feet of retail would be contained in the existing buildings. In the plan and massing diagram shown for this alternative, a parking garage would replace Buildings H-C. The plan, though not the massing diagram, shows the removal of Building I and replacement with surface parking. Of the 292,896 square feet of development proposed, 96,900 would be contained in the parking garage, thereby providing 196,896 square feet of developable floor area.<sup>1</sup>

The reuse of the Officers' Quarters for retail use is not practicable due to their configuration, including small interior spaces and the elevation of the floor above street level. The supermarket would be obscured from both Nassau Street/Flushing Avenue and Navy Street. This would limit the likelihood of finding tenant grocers, who would expect to have the supermarket prominently visible from the street. Buildings E-F-G would be retained under this alternative, but as described above, Building F is not structurally sound. Rehabilitation of Buildings K-L, B, D, E-F-G, and I would cost at least \$15.7 million (in 2008 dollars). Rehabilitation of Buildings K-L, B, D, and E-F-G would cost at least \$13 million (in 2008 dollars), along with the substantial additional costs of structured parking.

#### *ALTERNATIVE E*

Alternative E is a variation of Scheme 1. It would retain the Timber Shed and all of the Officers' Quarters though it would provide for a total of approximately 283,400 square feet and a

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<sup>1</sup> The floor areas per use shown for Alternative D do not add up to the total floor area proposed. The sum of the floor areas proposed results in a total of 368,759 square feet. It is not clear if the error is in the addition or the depiction of floor area for one of the uses.

## **Admirals Row Plaza**

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somewhat larger supermarket. Less parking is provided and surface parking is proposed instead of a parking garage. In addition, no retail is proposed.<sup>1</sup> No uses are projected for the Timber Shed and the Officers' Quarters.

Alternative E would not provide any retail space. The supermarket would be obscured from Nassau Street/Flushing Avenue, the principal thoroughfare through the area. This would limit the likelihood of finding tenant grocers, who would expect to have the supermarket prominently visible from the street. Buildings H-C and E-F-G would be retained and, as described above, Building C has partially collapsed and Building F is not structurally sound. Since all of the Officers' Quarters would be retained and reused, the cost for the rehabilitation of all of these buildings would be at least \$20 million in 2008 dollars.

### ***ALTERNATIVE F***

Alternative F would provide for a total of approximately 263,400 square feet and remove the Timber Shed and Buildings K-L and H-C. These historic buildings would be replaced by a 57,000-square-foot supermarket. A six-story industrial building is proposed at the northwest corner of the site on Navy Street. Surface parking is proposed. No retail is proposed. No uses are projected for the Officers' Quarters to be retained.

Alternative F would not provide any retail space. This alternative would demolish the Timber Shed, a unique and highly significant structure. Buildings E-F-G would be retained under this proposal, but, as described above, Building F is not structurally sound.

Alternative F would require at least \$11.8 million to rehabilitate Buildings B, D, E-F-G, and I.

### **CONCLUSIONS**

As described above, the schemes and alternatives proposed by MAS provide for a supermarket, industrial space, and in most cases retail, though in different amounts than proposed by the proposed project. Therefore, in most cases, if they could be feasibly developed, the alternatives would fulfill the principal programmatic goals and objectives of the proposed project—to provide a supermarket to serve neighborhood residents in an area that is underserved by grocery stores carrying fresh food and to allow BNYDC to further its core mission of job creation and the provision of light industrial space for small businesses. It should be noted that the size of the supermarket would affect its operations and sales. The alternative development proposals that propose a substantially smaller supermarket than proposed by the project may negatively affect the project's ability to attract an operator of a full-service, large-format supermarket, and thus its ability to meet that important project goal.

In addition to potential issues with respect to the size of the supermarket as discussed above, there are a number of constraints that affect the practicability of the MAS development proposals. All the proposals would retain either Buildings H-C or Buildings E-F-G or both groups of buildings. As described above, the retention of either or both groups of buildings is not practicable due to the partial collapse of Building C and structural instability of Building F. All the proposals with the exception of Alternative F include the placement of the supermarket at the rear of the site (so that it is not visible from Nassau Street or Navy Street) and/or the placement of a retail building behind the Officers' Quarters (also with little or no visibility from the street

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<sup>1</sup> There is a typographical error. 245,494 square feet is indicated as the floor area of the existing buildings. This number is assumed to be 45,494 square feet.

and not easily accessible by the pedestrian). The placement of these structures would affect their ability to attract tenants and the viability of the businesses. Most of the proposals include the reuse of the Officers' Quarters for retail space, and the configuration of the Officers' Quarters is not adaptable to house viable retail uses.

Alternative F and two other proposals (Scheme 3 and Alternative A) would result in significant adverse impacts on the Timber Shed. As described in Chapter 5, "Historic and Cultural Resources," the Timber Shed is a unique and highly significant structure. Therefore, retention and rehabilitation and/or reconstruction of this building to preserve both the structure and views to it is an important preservation goal of the proposed project.

The above described issues and constraints, when combined with the anticipated costs to rehabilitate five or more of the Officers' Quarters under any given alternative, renders the 11 alternative development proposals impracticable and/or diminishes their ability to meet the goals and objectives of the proposed project. As described above, the cost for the rehabilitation of all ten Officers' Quarters would be in excess of \$20 million (in 2008 dollars). In the MAS proposals—where at least five of the Officers' Quarters are retained and reused—rehabilitation costs would be at least \$9.6 million or more (also in 2008 dollars) and would increase for each additional Officers' Quarters building retained. These costs do not include those associated with the stabilization and rehabilitation of the Timber Shed, which is proposed in all but one of the alternative development proposals. As described above, BNYDC is committed to retaining and reusing the Timber Shed in addition to Building B. It is not feasible for BNYDC to retain any other additional buildings as the cost to rehabilitate these structures could not be borne in addition to the costs associated with the stabilization and rehabilitation and/or reconstruction of Building B and the Timber Shed, especially in light of the limited reuse potential of the remaining Officers' Quarters. Moreover, most of the MAS alternative development proposals would include structured parking to fit the new uses onto the site along with the retained structures, rather than surface parking as contemplated for the proposed project. This would require substantial additional costs as the cost for constructing structured parking is approximately five times more than that for building surface parking. \*