

A. INTRODUCTION

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

This chapter examines environmental conditions under the following alternatives and compares them with the proposed project:

- A No Action Alternative, which is mandated by CEQR and the State Environmental Quality Review Act (SEQRA), and is intended to provide an assessment of any consequences that could result from not selecting the Proposed Project. In this case, the proposed commercial center would not be constructed, and the Project Site would remain in its current condition.
- A Lesser Density Alternative, that examines a lower density development on the Project Site that is assumed to be an approximately 96,500-square-foot (sf) commercial center located on the southern side of the Project Site near the intersection of Arthur Kill Road and Richmond Valley Road.

PRINCIPAL CONCLUSIONS*NO ACTION ALTERNATIVE*

Under the No Action Alternative, the significant adverse impacts related to archaeology and traffic that are expected with the Proposed Project would not occur nor would there be the need for the related mitigation. The No Action Alternative is the “Future without the Proposed Project” described in each of the analysis chapters. For the purposes of a CEQR analysis, this was determined to be the No Action scenario, as the commercial development that would be permitted as-of-right under the existing zoning regulations on the Project Site would not fulfil the Applicant’s goals and thus would not be undertaken by the Applicant. Accordingly, under the No Action Alternative, it is assumed that there would not be any new development on the Project Site and it would remain in its current condition consisting of vacant land, wetlands, and a mapped, but unbuilt, segment of Richmond Valley Road. The existing residential building on Block 7632, Lot 6 (the Cole House) is also assumed to remain in the No Action Alternative.

LESSER DENSITY ALTERNATIVE

Under the Lesser Density Alternative, as in the Proposed Project, there would be significant adverse impacts to archaeology and traffic. In this alternative, the impacts would be fully mitigated and there would be no unmitigated significant adverse impacts. The Lesser Density

Alternative would redevelop a portion of the Project Site with a commercial center that is assumed to consist of a commercial center located at the southern end of the Project Site which would include three 2-story retail buildings and surface parking; the existing residential building on the Project Site (the Cole House) is assumed to be demolished to provide frontage on Arthur Kill Road, which is the only portion of the Project Site that has sufficient street access for economically viable commercial uses.

This alternative development is assumed to contain 96,500 square feet (sf) of commercial space that may be comprised of local retail or commercial office uses, with 340 surface parking spaces. This development would be significantly smaller than the Proposed Project, by approximately 490,000 sf, and would not contain any retail spaces larger than 10,000 sf. The Lesser Density Alternative would include waterfront open space that meets the Waterfront Zoning requirements. Under this alternative, given the estimated decrease in vehicular traffic, the impacts related to traffic would be reduced as compared to the Proposed Project, and it is not expected that there would be any unmitigated traffic impacts. However, the principal goals and objectives of the Proposed Project would also not be fully realized under this alternative. For example, the Lesser Density Alternative would provide fewer economic benefits, would not improve the full extent of Richmond Valley Road and open it to the waterfront, would not provide ecological enhancement and restoration at the Project Site, and would not facilitate the adaptive reuse of the Cole House.

B. NO ACTION ALTERNATIVE

DESCRIPTION OF THE NO ACTION ALTERNATIVE

Throughout the earlier chapters of this EIS, the No Action Alternative represents the conditions described as the “Future without the Proposed Project.” Under the No Action Alternative, there would not be any new development on the Project Site which is assumed to remain in its current condition with vacant waterfront land, wetlands, and an unbuilt segment of Richmond Valley Road. The existing residential building on Block 7632, Lot 6 (the Cole House) is assumed to remain under this alternative.

Conditions with the No Action Alternative as compared with the probable impacts of the Proposed Project are summarized below.

LAND USE, ZONING, AND PUBLIC POLICY

In the No Action condition, unlike with the Proposed Project, there would not be any new development on the Project Site, and therefore, site conditions would not change from the existing conditions. The existing residential building (the Cole House) would remain and the balance of the Project Site would remain vacant land. Under this alternative, there would be no zoning approvals; however, there would also be no commercial development and no new waterfront open space on the Project Site that would support public policy initiatives that aim to provide opportunities for job growth and public access to the waterfront. As with the Proposed Project, the No Action Alternative would not result in any significant adverse impacts to land use, zoning, and public policy. Objectives of the City's waterfront revitalization program including redeveloping underutilized waterfront properties and providing public access would remain unfulfilled.

SOCIOECONOMIC CONDITIONS

In the No Action Alternative, there would be no commercial development on the Project Site. Thus, unlike with the Proposed Project, there would be no economic benefits or retail sales. Neither the Proposed Project nor this No Action Alternative would result in any significant adverse impacts to socioeconomic conditions.

OPEN SPACE

In the No Action Alternative, unlike with the Proposed Project, there would be no commercial development or new waterfront open space on the Project Site; therefore, there would be no new worker population or open space resources introduced to the study area. There would also continue to be no publically accessible waterfront open space or preserved areas on the Project Site. As with the Proposed Project, the No Action Alternative would not result in significant adverse impacts to open space.

SHADOWS

In the No Action Alternative, unlike with the Proposed Project, there would be no new structures constructed on the Project Site; thus, there would be no new shadows. Accordingly, neither the Proposed Project nor this No Action Alternative would result in any significant adverse shadow impacts.

HISTORIC AND CULTURAL RESOURCES

In the No Action Alternative, unlike with the Proposed Project, there would be no commercial development on the Project Site that would have the potential to affect public views of the S/NR-eligible Outerbridge Crossing, and there would be no new subsurface disturbance that would have the potential to disturb archaeological resources. However, with the implementation of a construction protection plan, neither the Proposed Project nor this alternative would result in any potential significant adverse impacts on historic architectural resources. This alternative would also not open up new public views of the Outerbridge Crossing as is provided with the Proposed Project. Under this alternative, there would not be any subsurface disturbance that would result in the potential for archaeological impacts.

URBAN DESIGN AND VISUAL RESOURCES

As is expected with the Proposed Project, the No Action Alternative would result in no significant adverse impacts on urban design and visual resources. In this alternative, there would be no new commercial development on the Project Site; thus, unlike with the Proposed Project, there would be no new buildings altering the urban design or visual character, and the Project Site would remain vacant except for the Cole House. Similarly, there would be no extension of Richmond Valley Road or project elements that would enhance access to the waterfront (e.g., the proposed private drives, publically accessible plazas, walkways, and waterfront open space). In particular, as the Project Site would remain generally inaccessible to the public in this alternative, there would be no opportunities for additional views of the significant visual resources in the area, including the Arthur Kill waterfront or the historic Outerbridge Crossing.

NATURAL RESOURCES

The No Action Alternative would not result in any new construction on the Project Site that would impact natural resource features, including the clearing of vegetation, disturbance of freshwater and tidal wetlands, and tree clearing (which would occur with the Proposed Project). In the No Action Alternative, these natural resources are assumed to remain in their current condition. Therefore, while the No Action Alternative would not result in any adverse impacts on wetlands and the related mitigation or tree clearing, there would also be no enhancement of tidal wetlands.

HAZARDOUS MATERIALS

Unlike the Proposed Project, the No Action Alternative would not result in new construction with the potential to result in increased human or environmental exposure to hazardous materials. Thus, this alternative would not result in any subsurface disturbance requiring the need to implement soil and groundwater remedial measures as would be required with the Proposed Project. There would be no need for any construction protection measures or plans as is required with the Proposed Project; however, with the Proposed Project these measures would avoid any significant hazardous materials impacts. Therefore, as in the Proposed Project, there would be no significant adverse impacts related to hazardous materials in the No Action Alternative.

WATER AND SEWER INFRASTRUCTURE

Under this alternative, unlike with the Proposed Project, there would be no new development with the potential to result in increased water demand or sanitary sewage generation, and no alterations to the surface coverage, which is currently mostly vacant land. There would be no water, sanitary, or stormwater service built on the Project Site. In addition, there would be no improvements to the City's stormwater drainage system, i.e., construction of the storm sewer and outfall along Richmond Valley Road that would serve the Project Site. As with the Proposed Project, the No Action Alternative would not result in significant adverse impacts to water and sewer infrastructure.

SOLID WASTE AND SANITATION SERVICES

In the No Action Alternative, unlike with the Proposed Project, there would be no development creating the need for solid waste management and the increased demand for private sanitation services. However, neither the Proposed Project nor this alternative would result in any significant adverse impacts on solid waste and sanitation services.

TRANSPORTATION

Under this alternative, since there would be no new commercial development on the Project Site, unlike with the Proposed Project, there would be no new vehicle, transit, or pedestrian trips accessing the Project Site. The No Action Alternative would therefore not result in the potential for significant adverse traffic impacts that were identified for the Proposed Project. Neither the Proposed Project nor the No Action Alternative would result in any significant adverse impacts to transit, pedestrian circulation, vehicular and pedestrian safety, or parking.

AIR QUALITY

Under this alternative, unlike with the Proposed Project, there would be no new on-site pollutant emissions resulting from new building heating and hot water systems. Therefore, as with the Proposed Project, there would be no significant impacts on air quality due to stationary source emissions. Under the No Action Alternative there would be no emissions from vehicle trips accessing and departing the Project Site and there would be no significant impacts on air quality due to mobile source emissions. Similarly, there are no significant adverse stationary or mobile source air quality impacts predicted with the Proposed Project.

GREENHOUSE GAS EMISSIONS

Since there would be no new commercial development on the Project Site in the No Action Alternative, unlike with the Proposed Project there would be no increase in building emissions, vehicle use, or construction equipment operations that would cause greenhouse gas emissions, but neither this alternative nor the Proposed Project would result in any significant impacts with respect to greenhouse gas emissions.

NOISE

Under the No Action Alternative, unlike with the Proposed Project there would be no new commercial development on the Project Site and no new vehicle trips accessing the Project Site. Therefore, there would be no increase in noise from vehicular traffic affecting nearby receptors. As in the Proposed Project, the No Action Alternative would avoid the potential for significant adverse noise impacts.

PUBLIC HEALTH

Neither the No Action Alternative nor the Proposed Project would result in any significant public health impacts.

NEIGHBORHOOD CHARACTER

Neither the Proposed Project nor the No Action Alternative would result in any significant adverse impacts related to land use, socioeconomic conditions, open space, historic structures, urban design and visual resources, or shadows and there would not be the traffic impacts and need for mitigation as is necessary with the proposed project.

CONSTRUCTION

Unlike the Proposed Project, the No Action Alternative would not result in any construction activities on the Project Site that would have the potential to generate construction-related vehicle traffic, noise, vibrations, air pollutant emissions, or dust, as well as the disturbance of natural resources or increased exposure to hazardous materials. However, with the Proposed Project, the construction period is expected to result in only temporary impacts over the approximately 13-month construction period and a number of measures would be implemented to avoid any impacts due to construction activities. Therefore, under both this alternative and the Proposed Project, there would be no significant adverse impacts related to construction.

C. LESSER DENSITY ALTERNATIVE

DESCRIPTION OF THE LESSER DENSITY ALTERNATIVE

It is assumed under this alternative that a smaller portion of the proposed Project Site is developed with a commercial center of a smaller size than the proposed project. It is assumed that this alternative would need to comply with the applicable regulations of the manufacturing (M1-1 and M3-1) zoning districts as well as Waterfront Zoning and Special South Richmond District (SSRDD) regulations. In particular, this alternative would need to comply with the SSRDD regulations relating to tree removal and modification of site topography, which would limit the site area that could be redeveloped and the parking regulations of Section 107-472 of the Zoning Resolution (a maximum of 30 on-site spaces are allowed as-of-right in these zoning districts). The resulting development would consist of a small commercial center at the southern end of the Project Site near the intersection of Arthur Kill Road and Richmond Valley Road and entirely within the M1-1 zoning district on the Project Site. The assumed commercial center would include three 2-story retail buildings and a surface parking lot; two of the buildings would be located near Arthur Kill Road, while the third building would be located away from the street toward the center of the Project Site (see **Figure 19-1**). All of the buildings under this alternative would be less than 30 feet tall, in conformance with zoning.¹ In order to construct this alternative, the existing residential building on the Project Site (the Cole House) is assumed to be demolished. Removal of this structure would be necessary as the Cole House occupies the portion of the Project Site with frontage on Arthur Kill Road where there is direct vehicular access to commercial uses. Development on this portion of the Project Site also avoids impacts on wetlands but may require NYSDEC permits for activities in wetland-adjacent areas. This alternative would also require waterfront open space that meets the Waterfront Zoning requirements and a Certification pursuant to ZR 62-811 to certify compliance with the requirements of waterfront access and visual corridors.

In total, this alternative development would contain 96,500 sf of commercial space, which is assumed to include local retail or commercial office uses. This alternative would be substantially smaller than the Proposed Project (by approximately 490,000 sf). The parking lot under this alternative is assumed to provide 340 spaces, which would require an Authorization in accordance with Section 107-472 of the Zoning Resolution. This alternative would also include a much reduced improvement of Richmond Valley Road, limited to what is necessary to provide vehicle access to the proposed parking. As a result, unlike the Proposed Project, the improved portion of Richmond Valley Road would only extend approximately 250 feet west from Arthur Kill Road and would not extend the public right-of-way to the Arthur Kill waterfront.

This alternative site design would avoid the mapped wetlands and there would also be no new storm sewer extending down the mapped portion of Richmond Valley Road to the waterfront or new storm outfalls and stormwater would be managed using on-site sand filters and drywells.

The potential impacts of this alternative are compared below with the impacts of the Proposed Project.

¹ Waterfront Zoning regulations (ZR 62-341) limit all buildings containing commercial uses within low-density districts (such as the M1-1 district) to a maximum building height of 30 feet.



 Development Site

Lesser Density Alternative
Figure 19-1

LAND USE, ZONING, AND PUBLIC POLICY

This Lesser Density Alternative would result in a commercial center on a smaller portion of the proposed Project Site that, like the Proposed Project, would be compatible with the other existing and proposed developments in the study area, which are primarily commercial. Retail uses in this alternative development would likely be local retail facilities that would be similar to the other local retail facilities adjacent to the Project Site and along Arthur Kill Road, as the applicable zoning regulations only allow retail uses of less than 10,000 sf. This alternative would need to conform to all applicable zoning regulations, including waterfront zoning and the SSRDD regulations, cross access connection regulations per ZR 44-99, and an Authorization for parking would be required in accordance with Section 107-472 of the Zoning Resolution. It is assumed that the commercial buildings under this alternative would be less than 30 feet in height and would comply with the applicable bulk requirements.

While this alternative would provide commercial uses, they would be substantially smaller and more limited mix than under the Proposed Project (in particular, there would be no larger-scale retail or entertainment facilities larger than 10,000 sf). Therefore, this alternative would not be as supportive of the economic goals of public policies such as *Working West Shore 2030* as the Proposed Project.

As with the Proposed Project, the Lesser Density Alternative would not result in any significant adverse impacts or conflicts with land use, zoning, or public policy. However, as compared with the Proposed Project, this alternative would not as intensively redevelop this waterfront site for the purposes of generating economic benefits and waterfront redevelopment opportunities for western Staten Island; would not improve Richmond Valley Road and open it to the waterfront; would not provide ecological enhancement and restoration at the site; and would not facilitate the adaptive reuse of the Cole House.

SOCIOECONOMIC CONDITIONS

The Lesser Density Alternative would result in substantially less commercial space than the Proposed Project, and would likely feature only local retail or office uses. Due to the smaller building floorplates and zoning restrictions on retail facilities larger than 10,000 sf, the development would likely not contain destination retail or large-scale commercial uses or uses such as a cinema and supermarket. As discussed in Chapter 3, "Socioeconomic Conditions," the 433,898 gross square feet (gsf) of local and destination retail introduced by the Proposed Project would increase capture rates in the Primary Trade Area in the Shoppers' Goods (including Department Stores), Convenience Goods (including Grocery Stores), and Eating and Drinking Establishments retail categories, but would not capture retail sales in any of these categories of goods to the extent that the market for such goods would be saturated. Since this alternative would result in fewer comparable retail uses, it is not expected to result in any market saturation for such goods. Therefore, as with the Proposed Project, this alternative would not result in any significant adverse impacts to socioeconomic conditions.

OPEN SPACE

Similar to the Proposed Project, the Lesser Density Alternative would introduce a new worker population that would utilize nearby open spaces. This alternative could generate 386 new workers (the maximum number of workers, assuming all of the commercial space in this

alternative development were conservatively occupied by commercial office space²), substantially less than the 1,280 workers estimated with the Proposed Project. However, similar to the Proposed Project, this alternative would include waterfront open space that meets the requirements of the City's waterfront zoning. Therefore, under this alternative, there would be an increase in the open space ratio (which is zero under existing conditions, as there is currently no publicly accessible open space in the study area), and, as with the Proposed Project, the Lesser Density Alternative would not result in any significant adverse open space impacts.

SHADOWS

The three 2-story buildings under this Lesser Density Alternative would be less than 30 feet tall, which is the maximum height for buildings containing commercial uses in the M1-1 zoning district under Waterfront Zoning (ZR 62-341), whereas the Proposed Project would have a maximum height of 96 feet above grade. The Lesser Density Alternative buildings would therefore have a reduced shadow effect as compared with the Proposed Project, and the new shadows resulting under this alternative would largely fall on the parking lot, surrounding buildings, and a portion of the undeveloped area abutting the parking lot. This shadow would not fall on natural features, the shoreline, or any aquatic resources. However, neither this alternative nor the Proposed Project would result in any significant adverse shadow impacts.

HISTORIC AND CULTURAL RESOURCES

Under this alternative, commercial development would be located at the southern end of the Project Site, away from the only architectural resource in the area (the Outerbridge Crossing), and would not affect the context or visual setting of the resource. However, this alternative would result in significant adverse impacts related to archaeological resources and require the implementation of mitigation measures for archaeological resources, as would the Proposed Project.

URBAN DESIGN AND VISUAL RESOURCES

As stated above, this alternative would need to comply with the City's waterfront zoning requirements related to waterfront development and view corridors. Design of the commercial center, with buildings set within a parking lot, would be similar to the other commercial uses along Arthur Kill Road, particularly the shopping centers located adjacent to the Project Site and on to the eastern. However, the development would not include the extension of Richmond Valley Road to the waterfront or a private access road on the northern portion of the Project Site, the absence of which would result in more limited views of the waterfront from the upland area along Arthur Kill Road than that provided by the Proposed Project. Therefore, as with the Proposed Project, this alternative would not result in any significant adverse impacts to urban design or visual resources.

NATURAL RESOURCES

The Lesser Density Alternative would redevelop a smaller portion of the Project Site than the Proposed Project, and would generally be limited to the area at the southern end of the Project

² Worker estimate based on a rate of 250 sf per office worker; as the employment rate for retail spaces (400 sf per worker) is lower, retail uses would result in fewer workers than an all-office development.

Site along the Arthur Kill Road frontage. Therefore, this alternative would result in less natural resource habitat disturbance than the Proposed Project. Because this alternative would include the same waterfront improvements as the Proposed Project, it would involve tidal wetland restoration that is similar to, but less extensive than the Proposed Project since there would not be the same level of disturbance in the tidal wetlands and adjacent areas (i.e., there would not be a need for the outfalls included in the Proposed Project). This alternative would also comply with the applicable SSRDD requirements addressing tree removal and modification to site topography, and would therefore result in a minimized level of disturbance of natural resources on the Project Site as mandated by zoning (in particular, there would be less tree clearing than is expected with the Proposed Project). Therefore, this alternative would not result in any significant adverse impacts to natural resources, but would also not provide the tidal and freshwater wetlands restoration and enhancements as under the Proposed Project.

HAZARDOUS MATERIALS

Similar to the Proposed Project, the Lesser Density Alternative would need to comply with all applicable regulations to avoid potential hazardous materials impacts during construction. This would include implementing a Remedial Action Plan (RAP) and associated Construction Health and Safety Plan (CHASP), developed and approved by the New York City Department of Environmental Protection (DEP), which would address requirements for soil management, transportation and dust control, dewatering procedures, procedures for the proper closure and removal of any unknown petroleum storage tanks or related contamination, and implementing the appropriate health and safety measures during site disturbance so as to protect workers, the community, and the environment including regulatory requirements pertaining to removal of asbestos-containing materials, lead-based paint, and polychlorinated biphenyls. By implementing these measures through an (e) designation, this alternative, like the Proposed Project, would not result in any significant adverse hazardous materials impacts.

WATER AND SEWER INFRASTRUCTURE

With approximately 96,500 sf of commercial space, the Lesser Density Alternative would result in estimated water demand of 39,565 gallons per day (gpd) and would generate an estimated 23,160 gpd of sanitary wastewater³, which is substantially less than the 200,853 gpd of water demand and 117,486 gpd of sanitary sewage generation that would result from the Proposed Project. However, neither the Proposed Project nor this alternative would result in any significant adverse impacts on water and sewer infrastructure. In addition, this alternative would redevelop a smaller portion of the Project Site and would therefore result in less impervious surface area (in particular, with the smaller commercial buildings, the Lesser Density Alternative would result in the creation of substantially less impervious rooftop) and would therefore result in a lower volume of stormwater runoff than the Proposed Project. While it would be expected that, like the Proposed Project, this added drainage could be addressed on the Project Site without impacting adjacent properties, under this alternative there would be no improvements to the City's stormwater drainage system because Richmond Valley Road would not be extended westward to the Arthur Kill where the outfall could have a discharge point.

³ Estimates assume all space in the development is used as retail, which features a higher sanitary sewage generation rate (0.24 gpd per sf) than office space (0.10 gpd per sf).

SOLID WASTE AND SANITATION SERVICES

With approximately 96,500 sf of commercial space, the Lesser Density Alternative would generate up to 19,039 pounds (9.5 tons) of solid waste per week⁴, which is substantially less than the 187,992 pounds (or approximately 94 tons) that would be generated by the Proposed Project. As with the Proposed Project, the solid waste generated under this alternative would be handled by private carters, and would represent a negligible increase relative to the 26 million pounds (13,000 tons) of solid waste (including recyclables) handled by commercial carters every day which would not overburden existing commercial solid waste handling services. Therefore, as with the Proposed Project, this alternative would not result in any significant adverse impacts on solid waste and sanitation services.

TRANSPORTATION

With a total of approximately 96,500 square feet of retail space, the Lesser Density Alternative would be approximately 80 percent smaller than the Proposed Project. Utilizing the methodology described in Chapter 12, “Transportation,” total trips generated under this Lesser Density Alternative are provided in **Table 19-1**.

Table 19-1
Lesser Density Alternative Trip Generation Summary

Peak Hour	In/Out	Person Trips						Vehicle Trips				
		Auto	Taxi	SI Rail	Bus	Walk	Total	Auto	Taxi (Demand)	Taxi (Balanced)	Delivery	Total
AM	In	110	1	0	5	1	117	76	1	2	1	79
	Out	67	1	0	3	1	72	46	1	2	1	49
	Total	177	2	0	8	2	189	122	2	4	2	128
Midday	In	255	3	0	11	3	272	176	2	4	2	182
	Out	277	3	0	12	3	295	191	2	4	2	197
	Total	532	6	0	23	6	567	367	4	8	4	379
PM	In	255	3	0	11	3	272	176	2	4	0	180
	Out	277	3	0	12	3	295	191	2	4	0	195
	Total	532	6	0	23	6	567	367	4	8	0	375
Saturday	In	396	4	0	17	4	421	273	2	4	0	277
	Out	365	4	0	16	4	389	252	2	4	0	256
	Total	761	8	0	33	8	810	525	4	8	0	533

As compared with the trips generated by the Proposed Project (see Table 12-3 in Chapter 12, “Transportation”), this alternative would result in a proportional decrease of about 80 percent in total trips during all analysis periods. However, it would also not provide a northern driveway connection with Arthur Kill Road and the vehicle trips under this alternative would therefore all be concentrated at the intersection of Richmond Valley Road and Arthur Kill Road. At this intersection, total traffic volumes would decrease by only approximately 60 percent as compared to the Proposed Project.

⁴ Estimate assumes that all commercial space in the development is used as retail, which features a higher solid waste generation rate (79 pounds per employee per week) than office space (13 pounds per employee per week).

Based on existing roadway capacity and traffic conditions in the area under both the existing and No Action conditions, the reduced vehicular trip generation resulting under this alternative would still be expected to affect traffic capacity at certain intersections in the study area, particularly at the intersections located immediately near the Project Site (e.g., the intersection of Arthur Kill Road and Richmond Valley Road. However, under this alternative, given this decrease in vehicular trip generation, traffic impacts would be reduced as compared to the Proposed Project and it is not expected that there would be any unmitigated traffic impacts. Similar to the Proposed Project, it is not expected that this alternative would result in any significant adverse impacts with respect to traffic safety, transit, pedestrians, or parking.

AIR QUALITY

Under this alternative, like the Proposed Project, there would be no significant quality impacts from stationary source emissions. As described above, this alternative would result in a reduction of total vehicular traffic as compared to the Proposed Project. With the reduced traffic, there would be a similar reduction in mobile source emissions. Since the Proposed Project would not result in any violations of National Ambient Air Quality Standards (NAAQS) or applicable *de minimis* criteria for pollutants of concern, there would also be no violations under this alternative. This alternative would also not contain an enclosed parking garage and would have smaller heating systems; therefore, under neither this Lesser Density Alternative nor the Proposed Project (with the proposed (e) designation) would significant air quality impacts. Therefore, as with the Proposed Project, this alternative would not result in significant adverse air quality impacts.

GREENHOUSE GAS EMISSIONS

This Lesser Density Alternative assumes a smaller commercial center than that under the Proposed Project, with a smaller building size and fewer vehicle miles traveled. Therefore, this alternative would result in fewer GHG emissions from building energy systems and vehicle use. However, neither the Proposed Project nor this alternative would result in any significant adverse impacts with respect to GHG emissions.

NOISE

As described above, this alternative would result in a proportional decrease of 80 percent of total vehicular trips during all analysis periods from that under the Proposed Project; since there would be a single driveway from Arthur Kill Road, the decrease in total vehicular trips would be only approximately 60 percent at the intersection of Richmond Valley Road and Arthur Kill Road. With the reduction of vehicular traffic, vehicular noise at all receptors would be reduced. As with the Proposed Project, it is not expected that there would be any significant adverse noise impacts due to mobile sources under this alternative.

PUBLIC HEALTH

Neither the Lesser Density Alternative nor the Proposed Project would result in any impacts to public health.

NEIGHBORHOOD CHARACTER

As stated above, the Lesser Density Alternative would not result in any significant adverse impacts related to land use, socioeconomic conditions, open space, historic resources, urban

design and visual resources, or shadows. Neither the Proposed Project nor this alternative would result in any significant impacts to neighborhood character; however, it is expected that this alternative would result in fewer traffic impacts.

CONSTRUCTION

Construction of the Lesser Density Alternative would require short-term construction that may result in some temporary disruptions in the surrounding area, although as a smaller project the construction duration would be somewhat less than the Proposed Project (i.e., 12 months). As with the Proposed Project, all the necessary measures to reduce construction period impacts would be implemented during construction to ensure adherence to applicable regulations, such as the New York City Air Pollution Control Code and the New York City Noise Control Code. Maintenance and Protection of Traffic plans would also be implemented for any curb-lane and/or sidewalk closures and for hazardous materials, a RAP and a CHASP would be implemented. By implementing these measures, adverse construction impacts would be minimized, and, as with the Proposed Project, this alternative would not result in any significant adverse construction impacts. *