

3.8 ALTERNATIVES

INTRODUCTION

This chapter considers a range of alternatives to the proposed action. The purpose of this alternatives analysis is to examine reasonable alternatives to the proposed action that avoid or reduce action-related significant adverse impacts and may still allow for the achievement of the stated goals and objectives of the proposed action. The alternatives analysis also examines additional planning alternatives to the proposed action, including consideration of their ability to achieve the goals and objectives of the proposed action. In accordance with the Final Scope of Work issued March 19, 2008, this chapter includes the analysis of the following alternatives:

- No-Action (As-of-Right) Alternative*
 Under SEQRA, consideration of a No-Action Alternative is required. The No-Action Alternative (i.e., As-of-Right Alternative) examines future conditions within the proposed rezoning area assuming the absence of the proposed action. This alternative provides a baseline for the evaluation of impacts associated with the proposed action.
- No-Impact Alternative*
 The No-Impact Alternative examines a scenario in which there is a change in density or program design in order to avoid the potential significant adverse impacts associated with the proposed action.
- Lesser Density Alternative*
 The lower density alternative examines a planning scenario where each of the three proposed rezoning areas has a reduced density and in one case a more limited set of allowed uses. The reduction in density associated with this alternative would result in 266 less dwelling units; 232 less square feet of retail space and 225,414 less square feet of office space.

The incremental development scenario implications of the alternative are summarized in **Table 3.8-1** below and compared to the No-Action condition of the RWCDs for the 11 projected development sites identified in the proposed action. As shown in the table, the total net number of dwelling units and usage square feet would vary with each of the identified alternatives.

Table 3.8-1. Summary of Incremental Development Under Each Alternative

SCENARIO/ ALTERNATIVE	Total Incremental Square Feet of Development	Residential DUs	Retail FA (sf)	Office (sf)	Comm Fac./ Instit. FA (sf)
Proposed Action (Incremental)	942,365	594 (incl. 148 affordable units)	42,004	306,011	10
No-Action (As-of-Right Scenario)	0	0	0	0	0

No Impact	94,226	59	4,200	30,601	0
Lesser Density Alternative	450,244	328 (incl. 125 affordable units)	41,772	80,597	10

Notes: All SF shown in table is Zoning SF and no mechanical/utility SF was assumed.

For each of the technical areas presented in this targeted environmental impact statement, the anticipated effects of the proposed action are compared to those that would result from each of the alternatives. The purpose of this analysis, as set forth by the *City Environmental Quality Review (CEQR) Technical Manual*, is to provide decision makers with the opportunity to consider reasonable alternatives or planning scenarios that are consistent with the goals and objectives of the proposed action and that could potentially reduce or eliminate significant adverse impacts identified in the EIS.

3.8.1 NO-ACTION (AS-OF-RIGHT) ALTERNATIVE

Consideration of a No-Action Alternative, mandated by CEQR, is intended to provide the lead agency with an assessment of the consequences of not selecting the proposed action or any of the “build” alternatives. As analyzed under “Future Without the Proposed Action,” in Chapters 3.1 through 3.7 in this targeted EIS, the No-Action Condition Alternative also provides a baseline against which impacts of the proposed action may be compared.

In the future without the proposed action, the existing zoning controls would remain in place. It is expected that the rezoning area would experience some growth in residential and other uses. In the future without the proposed action, as-of-right development would be expected to occur on 9 of the 11 projected development sites identified by DCP in the rezoning area. Under the No-Action Condition (As-of-Right) Alternative, development on these projected development sites is expected to consist of:

- 299 dwelling units (DUs);
- 71,549 square feet of retail;
- 246,500 square feet of office space; and
- 11,720 square feet of community facility space.

It is expected that the incremental difference between the existing conditions and the No-Action scenario would total:

- 295 dwelling units (DUs);
- -4,289 square feet of retail;
- Zero square feet of office space (no incremental change over existing conditions); and
- 11,720 square feet of community facility space.

The projected effects of the No-Action Alternative are summarized below and compared to those of the proposed action.

Community Facilities and Services

Under the No-Action Condition Alternative, there would be some new residential development on the projected development sites. There would also be non-residential development, but the residential population would increase primarily as a result of planned as-of-right development in the rezoning area. All of the expected 295 incremental DUs under the No-Action Condition Alternative would be market rate units, and would generate substantially less demand for community facilities and services than the 446 market rate and 148 affordable net new housing units anticipated to be generated by the proposed action.

As described in further detail in Chapter 3.1, (Community Facilities and Services) of this targeted EIS, under the RWCDs for the No-Action Condition, it is projected that 115 new elementary students, 47 new middle school students, and 56 new high school students would be generated in the future without the proposed action. In 2018, in the future without the proposed action, it is anticipated that the half-mile study area will have a net increase of a total of 5,135 dwelling units, which overall are expected to generate approximately 2,003 new elementary students, 822 new intermediate school students and 976 new high school students. Of the 5,135 dwelling units, it is assumed that 3,185 will be for affordable housing.

Elementary schools in the half-mile study area are expected to operate at 103 percent capacity in 2018, absent the proposed action. Total enrollment in the study area would be approximately 9,007 students, which exceeds available seats by 678. However, this utilization rate is somewhat off-set by the number of charter schools located within the half-mile study area, which would increase the seat capacity for elementary students living in the study area. Furthermore, the City's Department of Education (DOE) has plans to add elementary seats in Community School District (CSD) 9, which would cause student capacity to increase and the utilization rate to decrease. While it is not yet known whether the new seats will be sited within the project study area, overall, CSD 7 and CSD 9 are expected to operate at 91 percent and 89 percent capacity, respectively. Therefore, CSDs 7 and 9, as a whole, would be operating below capacity under the No-Action Condition.

Intermediate schools in the half-mile study area are expected to operate at 65 percent capacity in 2018 absent the proposed action (the No-Action Condition). Total enrollment in the study area would be approximately 4,524 with 2,430 available seats. Enrollment in the study area includes 35 intermediate students that are expected to be generated as a result of the Boricua Village developments, which will be located in CSD 8. However, as there are no CSD 8 intermediate schools located within the half-mile study area, and the 35 students generated by the separately planned Boricua Village development would be expected to attend school in CSD 8, the actual utilization rate for the study area is expected to be lower than shown in Chapter 3.1 of this targeted EIS. Overall, CSDs 7 and 9 are expected to operate at 50 percent and 52 percent capacity, respectively. Therefore, neither the intermediate schools in the half-mile study area,

nor those in CSDs 7 or 9 as a whole, would be operating above capacity under the No-Action Condition.

It is estimated that in the future without the proposed action, 3,185 new housing units will be affordable housing. This would generate 1,370 new day care eligible students under the age of six. Under the future no-action condition, the 1,472 existing eligible children - combined with the 1,370 eligible children projected in the future No-Action scenario - would bring the number of eligible day care children to 2,842. The number of open day care slots in publicly funded facilities would remain at 1,670, thus the utilization rate for publicly funded day care facilities is projected to be 170 percent.

For libraries and health care services, there would be adequate capacity to support both the No-Action alternative and the proposed action. Regarding police and fire services, the NYPD and FDNY would continue to adjust their allocation of personnel as needs arise.

Neighborhood Character

Under the No-Action Condition, the existing zoning controls would remain in place. It is expected that the rezoning area would to experience growth in residential uses, while outside the rezoning area, commercial retail and market rate and affordable residential housing would be developed.

The development expected in the future without the proposed action would be dictated by the use and build controls of the existing zoning regulations. The East 161st Street corridor is primarily zoned with medium-density residential zoning districts. As described in further detail in Chapter 3.2 of this EIS, a smaller portion of the corridor is zoned with a high-density commercial zoning district that permits heavy automobile use and does not allow residential uses. The development expected to occur in the future without the proposed action would not be compatible with the specific characteristics and needs of the area, nor would it provide a plan for responsible development and growth in an area of the Bronx that is well served by mass transit.

During the 2008 to 2018 period, it is also expected that transportation demands in the study area would change due to specific development projects in the area, as well as general background growth over time. Increased congestion and reductions in levels of service would be present at most intersections under the No-Action Condition scenario.

Traffic and Parking

Traffic

During the 2008 to 2018 period, it is expected that transportation demands in the study area would change due to specific development projects in the area, as well as general background growth over time.

Overall, under the No-Action Condition Alternative for the Non-Game Day analysis, of the 28 intersections studied, there would be seven intersections with one or more congested movements during the weekday AM peak hour (versus five under existing conditions), two intersections during the weekday midday peak hour (versus two under existing conditions), eight intersections during the weekday PM peak hour (versus four under existing conditions), and two intersections during the Saturday midday peak hour (versus two under existing conditions).

Overall, under No-Action Condition Alternative for the Game Day analysis, of the 22 intersections studied, there would be nine intersections with one or more congested movements during the weekday PM peak hour (versus five under existing conditions), and one intersections during the Saturday midday peak hour (versus two under existing conditions).

However, the same significant adverse traffic impacts identified for the proposed action would not occur under the No-Action Condition Alternative, during both Game Days and Non-Game Days.

Parking

Under the No-Action Condition Alternative, it is anticipated that demand for off-street public parking would increase over existing conditions due to general background growth, new parking demand generated by known and projected developments within the study area. The future No-Action condition assumes that the existing zoning at each of the proposed development sites would remain unchanged through the 2018 horizon year. However, under the existing zoning, the proposed sites would be developed in the future to accommodate a net incremental increase of approximately 295 residential units.

The additional parking demand associated with development of the sites under the No-Action Condition Alternative was estimated based on the projected parking demand associated with the net increase in residential units anticipated under the existing zoning. Based on the resulting parking generation profile for the residential units, the projected parking demands under the No-Action condition were identified for the weekday AM, midday, and PM peak periods. As shown in Chapter 3.3 of this EIS, under the No-Action Conditions, the projected net new parking demand is 30 vehicles during the weekday AM peak hour, 22 vehicles during the weekday midday peak hour, and 43 vehicles during the weekday PM peak hour.

With the anticipated increase in residential units under the No-Action Condition, sufficient on-street and off-street parking supply is anticipated to be available in the study area to accommodate the net additional No-Action Condition parking demands during all three peak periods. Specifically, there are approximately 908 available on-street parking spaces during the weekday AM peak hour, approximately 482 available on-street parking spaces during the weekday midday peak hour, and approximately 700 available on-street parking spaces during the weekday PM peak hour. Similarly, the off-street parking facilities provide approximately 703 available spaces during the weekday AM peak hour, approximately available 1,048 spaces

during the weekday midday peak hour, and approximately available 2,074 spaces during the weekday PM peak hour.

Transit and Pedestrians

Under the No-Action Condition Alternative, transit and pedestrian facilities in the rezoning area would experience an increase in demand as a result of background growth and future developments anticipated throughout the rezoning area and its vicinity. However, overall transit and pedestrian demand would be lower than it would be with the proposed action.

Transit

Subway demand in the influence area of the 161st Street corridor is expected to increase under the No-Action Condition (compared to existing conditions), mainly as a result of background growth. As stated in further detail in Chapter 3.4 of this EIS, the No-Action Condition analysis of access stairways at the selected stations assumes no changes in existing train frequencies or operations, travel patterns or in the characteristics of the stations' stairways or other passenger-carrying elements (elevators, escalators). The demand analysis for the 2018 No-Action Condition was based on historical ridership trends at the 161st Street station. Published ridership data for the four-year span 2003-2006 from the 2006 MTA *Subway and Bus Ridership Report* have shown changes in ridership between consecutive years ranging from -3.1 to +5.6 percent, with an overall an average annual increase of 1.4 percent over the four-year period. A growth factor of 1.14 percent that results from an average annual increase of 1.4 percent over a period of 10 years was applied to the 2008 ridership volumes to project the 2018 No-Action volumes. The analyzed 161st Street station stairway would continue to operate at LOS "A" or better. The Metro-North Melrose Station stairway would continue to operate at LOS "A" or better under the No-Action Condition.

The year 2018 No-Action Condition analysis of MTA local buses expected to serve the study corridor assumes no changes in existing routes, frequencies, services or areas of maximum loading. The demand analysis is based on a CEQR background growth rate of 0.5 percent annual growth rate, or 5 percent over the ten year analysis period (2008-2018). For the purpose of this study, the existing ridership at the peak load points or areas of maximum loading for individual routes was projected to 2018 based on the average annual increase of 0.5 percent. The analysis of No-Action Conditions shows no capacity deficit would likely occur analyzed routes during the studied peak hours.

Pedestrians

As demonstrated in further detail in Chapter 3.4 of this targeted EIS, the level of pedestrian activity in the study area at the analyzed crosswalks and street corners is expected to increase under the 2018 No-Action Conditions, due to background growth, trips generated by other developments in the study area, and by the anticipated overall increase in transit ridership.

Two types of pedestrian analysis – crosswalk and corner analyses – were performed for those locations likely to be most heavily affected by the proposed 161st Street rezoning project. These analyses were performed for the following intersections: E. 161st Street and Concourse Village West-Sheridan Avenue; E. 161st Street and Concourse Village East-Morris Avenue; E. 161st Street and Grand Concourse Boulevard; E. 161st Street and River Avenue; and E. 161st Street and Sherman Avenue. A targeted Game Day analysis was also performed for crosswalks and corners at the intersection of E. 161st Street and River Avenue for pre-game peak-hour conditions for the weekday night games and Saturday early-afternoon games.

Non-Game Day Analysis

The results of the Non-Game Day analysis show that crosswalk levels of service for this No-Action Condition Alternative are comparable to the Existing conditions, with a few exceptions. The most notable change would occur at the intersection of E. 161st Street and Sherman Avenue, where the west crosswalk LOS would change from “C” to “D” during the Saturday peak hour. Otherwise, all crosswalks would operate at an LOS “C” or better. All street corners would continue to operate at LOS “A” during all four peak hours at all of the five analyzed street corner locations.

Game Day Analysis

Pedestrian traffic patterns in the influence area of the stadium and the intersection of E. 161st Street and River Avenue are projected to change due to the relocation of Yankee Stadium to the north side of E. 161st Street, the construction of three proposed parking garages, and the construction of new pedestrian facilities. These changes would result in greater usage of the north and east crosswalks and lesser usage of the south and west crosswalks.

The Yankee Stadium FEIS has listed several elements of a new pedestrian facility system that would improve pedestrian flows between the proposed parking garages and the new stadium and transportation system elements (transit, roadways, vehicular traffic). The temporary extension to the west of analyzed west crosswalk (resulting overall width of 115 feet approximately) at the intersection of River Avenue and E. 161st Street during the game periods is, for example, one of the pedestrian improvement measures that were proposed to ease pedestrian flows at this location (3,800 pedestrians during the peak 15 minutes). Pedestrian circulation is expected to increase at the northwest corner and decrease at the southeast corner of the intersection of River Avenue and E. 161st Street. Conditions at the southeast and northeast corners are not expected to significantly change. Although pedestrian demand at the northeast subway stairway would increase as a result of the relocation of the stadium, pedestrian circulation at the corner would not due to the “by-pass” condition associated with the “McDonald” circuitry path.

The No-Action Condition Alternative analysis results of the crosswalks and corners at the intersection of River Avenue and E. 161st Street, during the pre-game weekday and Saturday peak hours for the Game Day scenario, were derived from the Yankee Stadium redevelopment pedestrian volume projections and assumptions from the Yankee Stadium FEIS. During the weekday PM peak hour, the north crosswalk would experience LOS “F,” the east crosswalk LOS “E,” and the west and south crosswalks LOS “D.” During the Saturday peak hour, all crosswalks

would operate at LOS “E” except the east crosswalk, which would operate at LOS “F.” The analyzed corners would operate at LOS “D” or better during the weekday PM peak hour and during the Saturday peak hour would operate at LOS “D” or better, except the northwest crosswalk, which would operate at LOS “E”.

However, during the weekday PM peak hour analyzed for the Proposed Action, the north crosswalk would experience a LOS “F” and the west and south crosswalks (the most critical) experience LOS “D.” During the Saturday peak hour, all crosswalks operate at LOS “F” except the west crosswalk, which operates at LOS “E”. Yet comparing pedestrian operations under Future No-Action Conditions to Future Action Conditions for the weekday PM peak and Saturday midday peak hours, the results indicate marginal impact for the analyzed crosswalks. During pre-game periods, traffic enforcement agents are expected to manage the flow of traffic and help mitigate any such impacts and enhance safety. Similar to the No-Action conditions, the analyzed corners operate at LOS “D” or better during the weekday PM peak hour and at LOS “D” or better during the Saturday peak hour under the Proposed Action, except the northwest crosswalk, which would operate at LOS “E” under both Future No-Action and Future Action Conditions.

Air Quality

No violations of the National Ambient Air Quality Standards (NAAQS) are predicted to occur either under the No-Action Condition Alternative or under the Proposed Action, and both actions would be consistent with the New York State Implementation Plan (SIP). Under the proposed action, no impacts are expected to occur from mobile sources, air toxics, or HVAC systems, although the proposed action would include the mapping of (E) designations to preclude the potential for significant adverse impacts from HVAC systems.

The following air pollutants, known as criteria pollutants, have been identified by the U.S. Environmental Protection Agency (EPA) as being of concern nationwide: carbon monoxide (CO), nitrogen dioxide (NO₂), ozone, particulate matter (PM₁₀ and PM_{2.5}), sulfur dioxide (SO₂), and lead. The NAAQS concentrations are set for each of the criteria pollutants specified by the United States Environmental Protection Agency (USEPA) that have been developed to protect human health and welfare. New York has adopted the NAAQS as state ambient air quality standards. The following air pollutants were considered for this analysis: CO and PM_{2.5} for localized impacts of project-generated mobile source emissions; and SO₂, PM₁₀, and NO₂ for impacts of project-related HVAC emissions.

The trip generation conducted for the proposed residential development site indicates that the number of project-generated vehicles would be above CEQR CO screening threshold values during peak periods at affected intersections. Therefore, a detailed microscale modeling analysis was conducted that estimated CO levels near the intersections in the study area that are anticipated to be affected by the Proposed Action. Since the Proposed Action will generate primarily automobile traffic, a PM_{2.5} emission equivalency analysis was conducted. It was determined that project-generated automobile emissions were less than the CEQR screening

threshold and therefore a detailed PM_{2.5} analysis is not required. The project's first year of operation (2018) was considered, and CO pollutant levels were estimated for Existing conditions and in for future 2018 conditions with and without the Proposed Action.

Under the RWCDs, the Proposed Action is expected to be fully implemented by 2018. The CO analysis was conducted for 2008 existing conditions and for future 2018 conditions both with and without the Proposed Action (the Future Action and Future No-Action Conditions) for both the Game Day and Non-Game Day conditions. As described in further detail in Chapter 3.5 of this targeted EIS, the results of the CO microscale analysis for both Game Days and Non-Game Days show that CO levels would not exceed the 8-hour standard under existing or future conditions, including the No-Action Condition. The NYC Department of Environmental Protection (DEP) CO *de minimis* criteria would not be exceeded at any of the analysis sites under either the Game Day or the Non-Game Day conditions, indicating that the No-Action and the Proposed Action would not have the potential to cause CO impacts that are considered to be significant.

Noise

In the future without the proposed action, the noise levels at the six monitoring sites would be higher than the existing noise levels, as shown in Chapter 3.6 of this targeted EIS. The proposed action includes (E) designations for noise to ensure an acceptable interior noise level within new developments.

As stated in further detail in Chapter 3.6 of this targeted EIS, per *CEQR Technical Manual Guidelines*, in order to predict the noise levels in the future without the Proposed Action, monitored noise levels were adjusted by using a proportional modeling technique to take into account the increases in traffic associated with area growth. Future traffic volumes were obtained by adding future 2018 No-Action Condition Alternative traffic volumes to the existing baseline conditions for both Game Day and Non-Game Day conditions. The vehicular traffic volumes under the existing and future No-Action Conditions were converted into Passenger Car Equivalent (PCE) values, for which one medium truck is estimated to generate the noise equivalent of 13 cars, one bus is estimated to generate the noise equivalent of 18 cars, and one heavy truck generated the noise equivalent of 47 cars.

As indicated in the review of existing noise conditions, the existing noise levels range from the "Marginally Acceptable" to the "Clearly Unacceptable" category at the Development Sites. Future No-Action noise levels at the six monitoring sites would be higher than the existing noise levels, with increases in the range of 0.2 to 3.1 dBA during Non-Game Days, and increases in the range of 0.3 to 2.9 dBA during Game Days. Under CEQR, a change over 3 dBA could result in a noticeable increase in noise levels. As such, under the No-Action Alternative for Non-Game Days, noise level changes could be perceivable at monitoring Site #1 during the Saturday midday peak hour, as existing noise levels of 80.3 dBA would increase in the No-Action to 83.4 dBA, which represents a 3.1 dBA change (just over the 3 dBA threshold). Thus noise level increases might be perceivable under this No-Action Condition Alternative period (the Saturday midday peak hour).

As part of the Proposed Action, (E) designations would be placed on the zoning map for all projected and potential development sites where there is the potential for significant adverse noise impacts. Residential development on lots mapped with an (E) designation would be required to provide sufficient noise attenuation to maintain interior noise levels of 45 dBA or lower, as stated in further detail in Chapter 3.6 of this targeted EIS

Public Health

As demonstrated in Chapter 3.7 of this targeted EIS, the proposed action would not result in significant adverse public health impacts, as it would not significantly impact the various technical areas that comprise public health, such as air quality or noise. No activities are proposed that would exceed accepted City, State or federal standards with respect to public health or result in activities which result in significant public health concerns.

The proposed action includes (E) designations on hazardous materials and noise. In the future with the proposed action, 36 lots within the proposed rezoning area would most likely be redeveloped. The analysis in Chapter 3.10, “Hazardous Materials” of the 161st Street Rezoning/River Avenue EAS (see Appendix A) examines projected and potential sites where it could be expected that development in the future with the proposed actions, would have the potential for environmental impacts due to potential presence of hazardous materials. For all privately owned sites, (E) designations are recommended as part of the proposed zoning, based on whether the projected and potential development sites may have been adversely affected by current or historical uses at, adjacent to, or within 400 feet of these sites. By placing (E) designations on sites where there is a known or suspect environmental concern, the potential for an adverse impact to human health and the environment resulting from the proposed action is avoided. The (E) designation provides the City with the mechanism for addressing environmental conditions so that significant adverse impacts do not occur as a result of site development. The (E) designation requires that pre-development activities at each site include a Phase 1 environmental site investigation, and, if necessary, a sampling protocol and remediation to the satisfaction of NYCDEP before the issuance of a building permit.

The Proposed Action would also introduce new sensitive receptors into an area with high existing ambient noise levels. The existing noise levels at the six monitoring sites and the future noise levels at all of the proposed residential sites would exceed 70 dBA. The proposed (E) designation for these sites would preclude the potential for significant adverse noise impacts. These sites would be suitable for residential uses only by providing window-wall attenuation ranging from 30 dBA to 45 dBA for the exterior facade of the affected residences in order to achieve a 45 dBA interior noise level. Window attenuation requirements for the six noise monitoring sites are shown in the following bulleted items. The closed window condition at these sites can be maintained only by providing an alternate means of ventilation for the interior spaces.

In the future without the proposed action, such (E) designations would not occur. As such, the No-Action Condition (the As-of-Right Alternative) would not include such measures for noise attenuation or to address potential hazardous materials issues.

Conclusion

While background and other planned growth in the E. 161st Street area would occur under the No-Action Condition Alternative and result in some new impacts over existing conditions, the same action-generated impacts that occur under the Proposed Action would generally not occur under the No-Action Alternative. However, the benefits expected from the proposed action on the area would not be realized under this alternative. The No-Action Alternative would fall significantly short of the objectives of the proposed action in sustaining the ongoing revitalization of 161st Street, and encouraging and guiding new mixed-use development while preserving areas of the corridor. The Proposed Action builds on a number of recent public and private investments, which the No-Action Condition Alternative would not generate such advantages. The Proposed Action would foster mixed-use, residential, and commercial development compatible with development trends and ongoing commercial and residential investments in the area, and would add to the vitality of the street life in the area by increasing the residential population and encouraging ground floor retail uses. Such benefits would generally not occur under the No-Action Condition Alternative.

3.8.2 NO-IMPACT ALTERNATIVE

It is the City's practice to include, whenever feasible, a No-Impact Alternative that avoids, without the need for mitigation, all significant environmental impacts of the Proposed Action. As presented in this document, the Proposed Action is anticipated to result in significant adverse impacts to future action traffic and parking conditions.

To avoid the significant adverse impacts to traffic and pedestrian conditions, this alternative would require a substantial reduction in the total number of dwelling units within the proposed rezoning area. Incremental development would be scaled back approximately 90 percent, which would result in a total of 89 total DUs on the projected development sites, as compared to the projected 894 total DUs with the proposed action. This alternative would limit development to a net increase of approximately 59 units over No-Action Conditions, which would be 535 less units than the proposed action's 594 DU net increase increment in development. With the limited amount of residential development, far fewer sites would be developed.

A rezoning that would generate conditions under the No-Impact Alternative would involve much more of a limited amount of new development for the area of the Proposed Action. Such an alternative is not considered feasible given the number of projected development sites in the area. In addition, such an alternative would not address the goals and objectives of the proposed action. Therefore, for analysis purposes, a No-Impact Alternative is not feasible and is not analyzed in this EIS.

3.8.3 LESSER DENSITY ALTERNATIVE

The lower density alternative examines a planning scenario where each of the three proposed rezoning areas has a reduced density and in one case a more limited set of allowed uses. The alternative studies an R7X and R7X/C2-4 in the residential node. The R7X has a maximum residential FAR of 5.00 (base of 3.75 with a bonus up to 5.00 with inclusionary housing). The maximum community facility FAR is 5.00. A six- to eight-story base is allowed before a setback and a total building height of 125 feet is allowed. The perimeters of the proposed commercial overlay would not change and the allowed commercial FAR would be 2.00.

In the Civic Node the alternative would study a C4-5 commercial district. The C4-5 has a maximum commercial FAR of 3.4 and a maximum residential FAR of 3.44 (4.00 with Quality Housing). The maximum community facility FAR is 6.5. This building envelope is governed by the height factor regulations, the building may rise up to 60 feet at the street line before setting back. Beyond that the building envelope is determined by the sky exposure plane.

The alternative studies a reduced density version of the proposed C6-3D, a hypothetical C6-2D. Neither district exists now so a text amendment is needed to create either of them. The C6-2D would have a maximum commercial FAR of 6.00 and a maximum residential FAR of 7.2 (base of 5.4 with a bonus up to 7.2 with inclusionary housing). The maximum community facility FAR would be 6.00. The building envelope regulations would be identical to the proposed C6-3D; six to eight story base, set back and tower regulations above that; on streets with an elevated rail line a 15 foot to 25 foot base, set back and six to eight story secondary base and tower regulations above that. Sidewalk widening, corner setbacks and subway stair incorporation would also be required.

Development Scenario

The development scenario for the Lesser Density Alternative contains the same projected and potential development sites as for the proposed action. Due to the lower densities, this alternative would generate fewer dwelling units and less commercial floor area than the proposed action as described in detail below in **Table 3.8-2**.

**Table 3.8-2
 Summary of RWCDS for the Lesser Density Alternative and the Proposed Action**

Scenario / Alternative	Lesser Density Alternative	Proposed Action	Difference
	New increments (compared to Future No-Action conditions):		
Residential Dwelling Units (DUs)*	328	594	-266
Affordable DUs	125	148	-23
Commercial Retail FA (sf)	41,772	42,004	-232
Commercial Office FA (sf)	80,597	306,011	-225,414
Community Facility/Institutional FA (sf)	10	10	0

*Includes affordable dwelling units

Compared to the proposed action, the Lesser Density Alternative would result in the creation of 266 fewer residential dwelling units, including 23 fewer affordable residential units. When compared to the proposed action, the Lesser Density Alternative would result in 225,414 sf less commercial office floor area and 232 sf less commercial retail floor area.

Community Facilities

The projected population would decrease in the study area under the Lesser Density Alternative compared to the proposed action, and would therefore place less demand on community facilities and services. As is the case with the proposed action, this alternative would not result in a significant adverse impact to schools, libraries, health care services, and publicly funded day care, or police and fire services.

Neighborhood Character

Under the Lesser Density Alternative, effects on neighborhood character would be similar to those of the proposed action. The Lesser Density Alternative would result in changes to the general neighborhood character of the rezoning area with respect to land use, socioeconomic conditions, historic resources, urban design and visual resources, traffic, shadows and street-level pedestrian activity. Under this alternative the rezoning would foster mixed-use, residential, and commercial development compatible with development trends and ongoing commercial and residential investments in the area, and would add to the residential population and encouraging ground floor retail uses.

Similar to the proposed action, the respective commercial, civic and residential characters of the 161st Street corridor are expected to be improved under the Lesser Density Alternative. Under the

Lesser Density Alternative, the proposed action is anticipated to result in changes to the neighborhood character of the 161st Street corridor. These changes are considered to be beneficial to the overall character of the corridor and would not constitute significant adverse impacts to neighborhood character.

Traffic and Parking

Traffic

Despite the reduction in density which results in fewer vehicle trips, the number and location of impacted intersections remains the same in the Lesser Density Alternative as in the Proposed Action.

Table 3.8-3 compares the estimated peak hour vehicle-trip generation characteristics associated with the No-Action condition, the Action condition, and the Lesser Density Alternative.

Table 3.8-3: Comparison of Estimated Vehicle Trip Generation

Analysis Scenario	Estimated Net New Vehicle Trips			
	Weekday AM Peak Hour	Weekday Midday Peak Hour	Weekday PM Peak Hour	Saturday Midday Peak Hour
No-Action	<u>185</u>	<u>127</u>	<u>233</u>	<u>116</u>
Action	<u>429</u>	<u>243</u>	<u>528</u>	<u>213</u>
Lesser Density	<u>276</u>	<u>193</u>	<u>350</u>	<u>186</u>

As shown in Table 3.8-3, the Lesser Density Alternative is projected to generate fewer vehicle trips than the proposed action during all four peak hours analyzed. Therefore, the mitigation measures described under the Action condition are projected to be sufficient to mitigate the potential traffic impacts associated with this alternative. However, despite implementation of mitigation measures described under the Proposed Action, as is the case in with the Proposed Action, unmitigatable impacts will occur at the following intersection under the Lesser Density Alternative during peak hours on game days and non-game days:

Non-Game Days

- E. 149th Street at River Avenue/Exterior Street/ MDE (I-87) Northbound Off-Ramp –
 - During the weekday PM peak hour, delays for vehicles on the eastbound left turn movement are projected to increase from 190.2 seconds/vehicle (LOS “F”) under the No-Action condition to 192.5 seconds/vehicle (LOS “F”) under the Lesser Density Alternative condition; delays for vehicles on the MDE northbound off-ramp are projected to increase from 119.5 seconds/vehicle (LOS “F”) under the No-Action condition to 126.1 seconds/vehicle (LOS “F”) under the Lesser Density Alternative condition; and delays for vehicles on the southbound (River Ave.) approach are

- projected to increase from 132.0 seconds/vehicle (LOS “F”) under the No-Action condition to 135.0 seconds/vehicle (LOS “F”) under the Lesser Density Alternative condition.
- During the Saturday midday peak hour, delays for vehicles on the southbound Exterior Street left turn movement are projected to increase from 604.9 seconds/vehicle (LOS “F”) under the No-Action condition to 618.4 seconds/vehicle (LOS “F”) under the Lesser Density Alternative condition.

Game Days

- E. 149th Street at River Avenue/Exterior Street/ MDE (I-87) Northbound Off-Ramp
 - During the Game Day weekday pre-game PM peak hour, delays for vehicles on the westbound left turn movement are projected to increase from 371.8 seconds/vehicle (LOS “F”) under the No-Action condition to 380.1 seconds/vehicle (LOS “F”) under the Lesser Density Alternative condition; and delays for vehicles on the northbound Exterior Street left-turn movement are projected to increase from 309.3 seconds/vehicle (LOS “F”) under the No-Action condition to 316.6 seconds/vehicle (LOS “F”) under the Lesser Density Alternative condition; and delays for vehicles on the MDE northbound off-ramp are projected to increase from 242.8 seconds/vehicle (LOS “F”) under the No-Action condition to 252.1 seconds/vehicle (LOS “F”) under the Lesser Density Alternative condition.
 - During the Game Day Saturday midday pre-game peak hour, delays for vehicles on the MDE northbound off-ramp are projected to increase from 127.1 seconds/vehicle (LOS “F”) under the No-Action condition to 130.2 seconds/vehicle (LOS “F”) under the Lesser Density Alternative condition.

Potential significant adverse impacts to Traffic expected under the Lesser Density Alternative would be mitigated through the mitigation measures implemented similarly to the proposed action. In addition, unmitigated traffic impacts identified as a result of the proposed action scenario would continue to be unmitigable under the Lesser Density Alternative. However, the Lesser Density Alternative would produce less housing, including affordable housing, and less commercial space than the proposed action, without eliminating any of the significant adverse impacts related to traffic.

Parking

The proposed action would not substantially affect the number of on-street parking spaces within the study area, and there would be sufficient off-street public parking capacity to accommodate all project-generated parking demand not otherwise accommodated in accessory parking facilities. The proposed action would therefore not result in a significant adverse impact to on-street parking conditions. It should be noted, however, that utilization of on-street parking

spaces (both metered and unmetered) would likely remain at or near capacity within the study area during the peak weekday midday period, as was the case for the No Action condition.

Transit and Pedestrians

Transit

This alternative, with fewer dwelling units and less commercial (retail and office) space than the proposed action, would generate approximately 27 percent fewer pedestrian and transit (subway and bus) trips in the weekday AM peak hour, 19 percent fewer in the midday, 30 percent fewer in the PM peak hour and seven percent fewer trips in the Saturday midday peak hour. Similar to the proposed action, no bus capacity shortfalls are expected under the Lesser Density Alternative.

As discussed in Chapter 3.4, “Transit and Pedestrians,” subway demand generated by the proposed action is not expected to result in significant adverse impacts to subway stations serving the project site, or to subway line haul conditions. With fewer subway trips than the proposed action, the Lesser Density Alternative is also not expected to result in significant adverse impacts to subway stations or subway line haul conditions.

Pedestrians

New pedestrian demand generated by the proposed action is not expected to result in significant adverse impacts to pedestrian movements during the non-game day analysis periods. However, demand from the proposed action could affect three crosswalks locations during PM and Saturday midday time peak periods during the game day analysis periods: the east crosswalk at 161st Street and River Avenue during the PM peak period, and the north and south crosswalks at the same intersection during the Saturday midday peak period. While the Lesser Density Alternative generates less pedestrian volume than the Proposed Action, the pedestrian affect during the PM and Saturday midday peak hour at the above-mentioned crosswalks at 161st Street and River Avenue would still occur under the Lesser Density Alternative. The east crosswalk, during the PM peak period, would operate at LOS E with 10.6 sq-ft/ped compared to LOS E with 12.4 sq-ft/ped in the No-Action condition. The north crosswalk, during the Saturday midday peak period, would operate at LOS E with 8.0 sq-ft/ped compared to LOS E with 8.0 sq-ft/ped in the No-Action. The south crosswalk, during the Saturday midday peak period, would operate at LOS F with 7.2 sq-ft/ped compared to LOS E with 8.3 sq-ft/ped in the No-Action.

As is the case with the Proposed Action pedestrian analysis, the results of the pedestrian analysis for the Lesser Density Alternative account for a peak surge of pedestrians during worst-case (i.e. a sold out stadium) conditions. During pre-game periods, normal traffic operations are expected to be adjusted and NYPD traffic enforcement officers are expected to manage the flow of pedestrians and traffic to help mitigate any pedestrian impacts and enhance safety. Therefore, no significant adverse impacts to pedestrian movements are anticipated from the Lower Density Alternative.

Air Quality

Under the Lesser Density Alternative each of the three proposed rezoning areas has a reduced density and in one case a more limited set of allowed uses. The Lesser Density Alternative is also not expected to result in significant adverse impacts related to air quality.

Mobile Sources

No significant mobile source air quality impacts are expected as a result of the proposed Rezoning Action under the Lesser Density Alternative. As the number of trips generated would be lower under the Lesser Density Alternative than the proposed action, no significant impacts are expected under this alternative as well.

Garage Analysis:

Similar to the proposed action, this analysis assumes there will be a garage near Site 4. No significant mobile source air quality impacts are expected as a result of the proposed Rezoning Action. As the garage would be the same or smaller under the Lesser Density Alternative, no significant impacts are expected under this alternative as well.

Stationary Source Analysis:

As in the analysis of the proposed action, no significant building-on-building air quality impacts are expected as a result of the proposed action with the specified “E” designations. This result applies to the Lesser Density Alternative as well for the following reasons:

- The buildings would have the same or shorter heights under the Lesser Density Alternative than under the RWCDS;
- The heights of each building would decrease proportionally from the RWCDS; and
- The relative heights of nearby development buildings will not change under this alternative (i.e., while it is possible that a previously taller building under the RWCDS may now be shorter, and thereby impact, a previously shorter nearby building, this is not the case under the Lesser Alternative).

It should be noted that this result for the Lesser Density Alternatives applies with the “E” designations specified for the RWCDS. Less conservative set-back distances may be possible for the Lesser Density Alternative as a result of a detailed modeling analysis of the HVAC emissions from the Lesser Density Alternative buildings.

No significant air quality impacts on existing land uses are expected as a result of the proposed Rezoning Action under the RWCDS. The proposed buildings would have the same heights (and sizes) or shorter heights (and sizes) under the Lesser Density alternative. In addition, the Lesser Density Alternative would not create a new situation where the project buildings would be shorter than nearby sensitive taller buildings (i.e., the buildings under the RWCDS that are taller than existing nearby buildings will still be taller than these existing buildings under the Lesser Density Alternative). As such, no significant impacts are expected under this alternative.

The result of the analysis for the RWCDS is that no exceedances of the NAAQS for all applicable pollutants are predicted as a result of clusters impacts. As the cluster impacts would be lower under the Lesser Density Alternative (as a result of smaller building sizes), no significant impacts are expected under this alternative as well.

Industrial Source Analysis:

As specified for the RWCDS, no large boiler emission sources are located within 1,000 feet of the proposed developments and therefore no further analysis is required. This result applies to the Lesser Density Alternative as well.

The result of air toxics analysis for the Lesser Density Alternative is that no exceedance of either the NYSDEC SGC or AGC acceptable limits or EPA's incremental risk threshold limit is predicted.

Therefore, with the E-designations for stationary sources in place, the Lesser Density Alternative would have no potential significant adverse environmental impacts on air quality.

Noise

When compared to the proposed Action, the decrease in project density under the Lesser Density Alternative would not result in any significant increases in local ambient noise or a doubling of traffic at any roadway or intersection such that a significant adverse impact would occur. The reduction in density would also not affect the conclusions of the noise analysis with respect to the noise related to heavily trafficked thoroughfares. Therefore, the need for noise attenuation, would be the same as were outlined for the proposed action and similar E-designations as the proposed action would be required. With the E-designations in place, the Lesser Density Alternative is not expected to result in significant adverse impacts related to noise.

Public Health

The proposed action would not result in significant adverse public health impacts, as it would not significantly impact the various technical areas that comprise public health, namely, air quality, hazardous materials, solid waste management, and noise. Similar to the proposed action, the Lesser Density Alternative would also include the noise attenuation, and hazardous materials testing and remediation requirements due to the proposed (E) designations that would be incorporated as part of this alternative and the proposed action. Therefore no significant adverse impacts are expected under the Lesser Density Alternative or the proposed action.

Mitigation

The Lesser Density Alternative is projected to generate fewer vehicle trips than the proposed action alternative during all four peak hours analyzed. However, the potential mitigation

measures required to alleviate the impacts under Proposed Action are sufficient to mitigate the potential traffic impacts associated with this alternative. Despite these mitigation measures an intersection in the study area is still projected to experience significant adverse traffic impacts (as is the case under the Proposed Action). This intersection is discussed below in the “Unavoidable Adverse Impacts” section.

While the Lesser Density Alternative generates less pedestrian volume than the Proposed Action, the significant adverse PM and Saturday midday peak hour impacts to the east, north and south crosswalks at 161st Street and River Avenue expected under the Proposed Action would remain under the Lesser Density Alternative. As is the case with the Proposed Action pedestrian analysis, the results of the pedestrian analysis for the Lesser Density Alternative account for a peak surge of pedestrians during worst-case (i.e. a sold out stadium) conditions. During pre-game periods, normal traffic operations are expected to be adjusted and NYPD traffic enforcement officers are expected to manage the flow of pedestrians and traffic to help mitigate any pedestrian impacts and enhance safety. Therefore, no mitigation is proposed for the potential impacts to these crosswalks.

Unavoidable Adverse Impacts

The mitigation measures proposed to alleviate significantly impacted traffic conditions as part of the Proposed Alternative are expected to alleviate significantly impacted traffic conditions under the Lesser Density Alternative. However, despite these mitigation measures, as is the case with the Proposed Action, under the Lesser Density Alternative, significant adverse traffic impacts would remain at the following intersections:

- E. 149th Street at River Avenue/Exterior Street/ MDE (I-87) Northbound Off-Ramp

Conclusion

The lower density alternative examines a planning scenario where each of the three proposed rezoning areas has a reduced density and in one case a more limited set of allowed uses. The development scenario for the Lesser Density Alternative contains the same projected and potential development sites as for the proposed action. Due to the lower densities, this alternative would generate fewer dwelling units and less commercial floor area than the proposed action. Compared to the proposed action, the Lesser Density Alternative would result in the creation of 266 fewer residential dwelling units, including 23 fewer affordable residential units. When compared to the proposed action, the Lesser Density Alternative would result in 225,414 sf less commercial office floor area and 232 sf less commercial retail floor area.

The Lesser Density Alternative would have effects similar to those of the Proposed Action. Potential significant adverse impacts to Traffic expected under the Lesser Density Alternative would be mitigated through the mitigation measures implemented similarly to the proposed action. In addition, unmitigated traffic impacts identified as a result of the proposed action

scenario would continue to be unmitigable under the Lesser Density Alternative. The Lesser Density Alternative would produce less housing, including affordable housing, and less commercial space than the proposed action, without eliminating any of the significant adverse impacts.