

**A. INTRODUCTION**

Consistent with the State Environmental Quality Review Act (SEQRA) and City Environmental Quality Review (CEQR) requirements, this chapter of this ~~Draft~~ Final Environmental Impact Statement (~~D~~EFEIS) examines alternatives to the proposed St. George Waterfront Redevelopment project (the proposed project).

SEQRA and CEQR require the examination of a No Action Alternative, in which a proposed project would not be undertaken. The technical chapters of the ~~D~~EFEIS have described the No Action Alternative (referred to as “the future without the proposed project” or “No-Action condition”) and have used it as a baseline to establish potential impacts and associated mitigation for the proposed project. However, in this chapter, the potential impacts of the proposed project are compared directly with the No Action Alternative. In addition to the No Action Alternative, this chapter examines a St. George Retail Development Only Alternative, and a NY Wheel Only Alternative, and No Unmitigated Traffic and Subway Impacts Alternatives.

The St. George Retail Development Only Alternative would include the same types and amounts of retail, hotel and catering space, and parking as currently proposed for the South Site but would not include the Observation Wheel, Wheel Terminal Building or its parking structure and rooftop open space as envisioned by the proposed project. The Wheel Only Alternative would develop the Wheel, Wheel Terminal Building and parking structure with its rooftop open space, but would not include the retail outlet center, hotel, catering uses, or parking as currently proposed for the South Site. In the St. George Retail Development Only and Wheel Only Alternatives, the development would remain in the location contemplated in the future with the proposed project though the distribution of new parking capacity could be optimized between the North and South Sites. The No Unmitigated Traffic and Subway Impacts Alternatives examine alternatives that include both proposed project elements but at a size which would avoid the unmitigated significant adverse traffic impacts identified in Chapter 22, “Mitigation Measures.”

For the alternatives that offer a reasonable and practicable alternative to the proposed project, the anticipated effects of the proposed project for each of the technical analyses presented in the EIS are compared with those that would result from each of the alternatives. The purpose of this analysis, as set forth in the 2012 *CEQR Technical Manual*, is to provide decision-makers with the opportunity to consider practicable alternatives that are consistent with the project’s purpose and that could potentially reduce or eliminate significant adverse environmental impacts identified in the EIS.

## **PRINCIPAL CONCLUSIONS**

### *NO ACTION ALTERNATIVE*

In the No Action Alternative, there would be no changes in the use of the project sites. Both the North Site and the South Site would remain surface public parking lots for the Staten Island Ferry St. George Terminal (Ferry Terminal) and the Richmond County Bank Stadium (Stadium). In 2013, the reconstruction of the Wall Street Ramp between Richmond Terrace and Bay Street would increase the number of parking spaces on the South Site from 754 existing spaces to 810 spaces. Under the No Action Alternative, it is assumed that the waterborne transit landing would not be introduced ~~as it could be implemented with the proposed project~~. With the No Action Alternative, Bank Street would remain a 24-foot roadway from Jersey Street to the easternmost boundary of the North Site.

Unlike the proposed project, the No Action Alternative would not result in the significant and adverse traffic impacts at 14-13 intersections, ~~or the significant and unavoidable impacts at 1-3 intersections~~ or the partially mitigatable impact at 1 intersection caused by the proposed project. Also, the No Action Alternative would not result in ~~any~~ the potential significant and adverse transit impacts on ~~the Staten Island Ferry the northern platform stairs to/from the downtown R platform at the Whitehall Station. Under the No Action Alternative, the Staten Island Ferry is projected to be over functional capacity in 2016 independent of the proposed project.~~ However, the No Action Alternative would not convert large surface parking lots located on waterfront property into a vibrant mixed-use area that capitalizes on existing transportation infrastructure, and would not result in the beneficial impacts that the proposed project would create in the areas of land use and public policy, socioeconomics, open space access, and stormwater management. In terms of neighborhood character, the No Action Alternative would continue to limit the vitality and character of the St. George waterfront by leaving the surface parking lots in place and isolating the waterfront from Richmond Terrace and upland St. George. In comparison, the proposed project is expected to result in a positive effect on the neighborhood character in the study area, and would enhance the area as an attractive gateway to Staten Island.

### *ST. GEORGE RETAIL DEVELOPMENT ONLY ALTERNATIVE*

The St. George Retail Development Only Alternative would develop the same types and amounts of retail, hotel, and catering space that would be introduced on the South Site in the future with the proposed project. This alternative would also provide parking to replace any parking displaced by project construction and additional parking to meet the needs of the proposed development. With either the St. George Retail Development Only Alternative or the Wheel Only Alternative, there could still be the potential addition of a waterborne transit landing, which would be located at the end of the Wall Street Ramp.

The St. George Retail Development Only Alternative would be configured with the same design and program as set forth in the proposed project—a 340,000-square-foot terraced retail outlet center, a 130,000-square-foot (200-room) hotel, a 20,000-square-foot catering facility, and 40,000 square feet of back of house and mechanical space.

Similar to the proposed project, the St. George Retail Development Only Alternative would also deck over (but not eliminate) the railroad right-of-way (RROW) located on that site. While the proposed project would contain an estimated 1,250 parking spaces on the South Site, it is possible that under the St. George Retail Development Only Alternative the 1,250 South Site parking spaces planned by the proposed project may be distributed between the North and South

Sites. With the St. George Retail Development Only Alternative, Bank Street would remain a 24-foot roadway from Jersey Street to the easternmost boundary of the North Site.

With the St. George Retail Development Only Alternative, it is possible that additional retail and commercial development could be accommodated in lieu of the demand previously identified for the Wheel portion of the proposed project. If a larger project were contemplated, it would likely require supplemental environmental analysis with a scope of assessment determined if and when such a change is considered.

Unlike the proposed project, the St. George Retail Development Only Alternative would not result in as many significant and adverse but mitigated traffic impacts. Generally, the environmental impacts of St. George Retail Development Only Alternative would be similar to that of the proposed project, but they would be of a lesser magnitude. ~~The three unmitigated traffic impacts that would result from the proposed project would remain unmitigated under this alternative, and the partially mitigated traffic impact would remain partially mitigated.~~

The St. George Retail Development Only Alternative would not provide as many of the beneficial effects as expected with the proposed project. While this alternative would provide a net increase of ~~0.09~~ 0.14 acres of passive open space on the South Site, it would not provide ~~a net increase of 7.72~~ 4.94 acres of new active and passive open space that would be introduced by the proposed project on the North Site. In addition, it would enhance upland connections only on the South Site. It would not redevelop the same expanse of prime waterfront property, and would therefore not support local planning goals to the same degree as the proposed project.

Without the Wheel, daily visitation to the project sites under the St. George Retail Development Only Alternative would likely be less than anticipated under the proposed project, and any benefit from increased retail traffic in the study area may be less pronounced. Similarly, without the Wheel, this alternative would result in less extensive or prominent views to and from architectural resources along Richmond Terrace. Because the St. George Retail Development Only Alternative does not include the Observation Wheel, only the hotel portion of the development is anticipated to be visible in some views within or from just outside of the study area beyond the immediate Richmond Terrace frontage. The St. George Retail Development Only Alternative would be less visible in longer views toward the project sites than would the proposed project. The lighting program on the South Site that would be introduced with the proposed project would be introduced with this alternative; however, no lighting would be introduced on the North Site. As described in Chapter 8, "Urban Design and Visual Resources," the lighting design on the South Site would be mindful of the adjacent waterfront, residential areas, and adjacent New York City Department of Transportation (NYCDOT) Ferry operations. Therefore, like the proposed project, the St. George Retail Development Only Alternative would not have a significant adverse impact on urban design and visual resources.

The St. George Retail Development Only Alternative would result in a lower net increase in vegetation cover that could potentially benefit some wildlife such as insects and songbirds. ~~Its potential improvement to water quality by increasing pervious surface coverage and improving stormwater capture would be slightly smaller than that of the proposed project. The increase in impervious surface would be smaller than that of the proposed project, but as discussed for the proposed project, the proposed NYCDOT service road near the South Site would be within the New York State Department of Environmental Conservation (NYSDEC) tidal wetlands adjacent area and would require authorization under Article 25 of the Environmental Conservation Law (ECL). However, as with the proposed project, the St. George Retail Development Only Alternative, with the implementation of stormwater management measures, would not adversely~~

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affect water quality, aquatic biota, or NYSDEC littoral zone tidal wetlands of the Upper New York Harbor within the vicinity of the project site.

Similar to the proposed project, it is expected that the construction activities associated with the St. George Retail Development Only Alternative would result in significant adverse impacts with respect to vehicular traffic at the intersection of Richmond Terrace and Jersey Street after the end of the second quarter of 2015. Like the proposed project, this impact can be mitigated by advancing the proposed mitigation for the With-Action condition at this location.

Like the proposed project, the St. George Retail Development Only Alternative is expected to result in a positive effect on the neighborhood character in the study area, but to a lesser degree than the proposed project because it would only benefit the South Site since the North Site would remain a surface parking lot separating Richmond Terrace from the waterfront.

As discussed in Chapter, 1, “Project Description,” it is possible that the project sites could be developed with a No Catering Facility Scenario. This scenario removes the 20,000-square-foot catering facility and 5,000 square feet of back of house space. This space would be replaced with 25,000 square feet of retail space. Findings for the No Catering Facility Scenario would be similar to the findings for the St. George Retail Development Only Alternative.

### *WHEEL ONLY ALTERNATIVE*

The Wheel Only Alternative would be consistent with the proposed project including development of the North Site with the Observation Wheel, Wheel Terminal Building, and parking structure with a green roof and passive and active open space. With either the Wheel Only Alternative or with the St. George Retail Development Only Alternative, there could still be the potential addition of a waterborne transit landing. The Wheel Only Alternative would not include the retail outlet center, hotel, catering facility, or parking that would be introduced by the proposed project on the South Site.

The Wheel and Wheel Terminal Building under the Wheel Only Alternative would be the same as envisioned under the proposed project—a 625-foot-tall Observation Wheel, a 95,100 ~~120,000~~-gross-square-foot (gsf) Wheel Terminal Building. Similar to the proposed project, the Wheel Only Alternative would also deck over (but not eliminate) the RROW located adjacent to the proposed North Site parcel. The Wheel Terminal Building in the Wheel Only Alternative would be the same as proposed under the proposed project, housing 47,300 ~~40,000~~ gsf of commercial space, 18,500 ~~25,000~~ gsf of retail space, an 7,600 ~~11,000~~ gsf restaurant,<sup>1</sup> 5,900 ~~17,000~~ gsf of exhibition or wheel hall space, 4,000 ~~4,200~~ gsf of theater space, as well as 11,600 ~~23,000~~ square feet of back of house and mechanical space. While there would be a net increase of 7.81 ~~4.76~~-acres of active and passive open space with the proposed project, the Wheel Only Alternative would introduce 7.72 ~~4.62~~ acres of active and passive open space on the North Site.

Parking for the Wheel Only Alternative would either be provided exclusively on the North Site, in a ~~four~~ three-level public parking structure as envisioned under the proposed project, or partially in structured parking on the North Site with the remainder provided in structured parking on the South Site.

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<sup>1</sup> The transportation analysis conservatively considers the effects of a 15,000 sf restaurant, which includes the 7,600 ~~11,000~~ sf of indoor restaurant space described in Chapter 1, “Project Description,” as well as outdoor seating associated with the restaurant.

Aside from any potential expanded parking area, the South Site in the Wheel Only Alternative would remain in its current condition. With the Wheel Only Alternative, there could still be the potential addition of a waterborne transit landing which would be located at the end of the Wall Street Ramp.

Like the proposed project, under the Wheel Only Alternative, Bank Street would be widened from a 24-foot to a 30-foot roadway. The widened Bank Street would include a bike lane from Jersey Street to the easternmost boundary of the North Site.

Unlike the proposed project, the Wheel Only Alternative would not have as many significant and adverse but mitigated traffic impacts. Generally, the environmental impacts of the Wheel Only Alternative would be similar to that of the proposed project, but they would be of a lesser magnitude. The three unmitigated impacts that would result from the proposed project would remain unmitigated under this alternative, and the partially mitigated impact would remain partially unmitigated.

Under the Wheel Only Alternative, the South Site would remain a surface parking lot, or possibly an expanded parking structure to accommodate a portion of the existing and project-generated parking demand. The Wheel Only Alternative would enhance upland connections on the North Site; however, it would not redevelop the same expanse of prime waterfront property as under the proposed project. As a result, this alternative would not support local planning goals to the same degree as the proposed project. It is noted that without the St. George Retail Development project, daily visitation to the project sites under the Wheel Only Alternative would likely be less than anticipated under the proposed project, and any benefit from increased retail traffic in the study area may be less pronounced. The Observation Wheel would be the most prominent visual element of the Wheel Only Alternative and of the proposed project. The lighting program on the North Site that would be introduced with the proposed project would be introduced with this alternative; however, no lighting would be introduced on the South Site. As described in Chapter 8, "Urban Design and Visual Resources," the lighting program that would be introduced by the proposed project on the North Site would be designed and managed to avoid new lighting on the land side portion thereby minimizing night lighting effects on the inland community. Therefore, like the proposed project, the Wheel Only Alternative would not have a significant adverse impact on urban design and visual resources. The Wheel Only Alternative would be more active and would enhance the pedestrian experience of the North Site compared with the existing condition, but such improvements would be more limited than under the proposed project, since the alternative would develop only the North Site, leaving the South Site as a surface parking lot. With the Wheel Only Alternative, it is also possible that there could be a shift of some of the commuter parking that is proposed on the North Site by building a new parking structure on the South Site that would accommodate all the existing South Site parking and a portion of the North Site spaces. This would permit a smaller and less complex parking structure to be built on the North Site, although it is still assumed that the Wheel Only Alternative would have a parking structure with its green roof and would provide 7.88 ~~4.94~~ acres of active and passive open space.

With its green roof and open space, this alternative would result in a net increase in vegetation cover that would potentially benefit some wildlife. But overall, neither the Wheel Only Alternative nor the proposed project would have significant adverse impacts to natural resources or floodplains in the area, and both may slightly improve water quality by increasing pervious surface coverage and improving stormwater capture with the implementation of stormwater management measures, the increase in impervious surface would not adversely affect water quality, aquatic biota, or NYSDEC littoral zone tidal wetlands of the Upper New York Harbor

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within the vicinity of the project site. As discussed for the proposed project, authorization under Article 25 of the ECL would be required from NYSDEC for the Wheel Only Alternative for development within the NYSDEC tidal wetlands adjacent area. The Wheel Only Alternative would still require the implementation of a best practices management and monitoring program for night lighting in order to minimize the potential for adverse impacts with night lighting of the Observation Wheel.

Similar to the proposed project, it is expected that the construction activities associated with the Wheel Only Alternative would result in significant adverse impacts with respect to vehicular traffic at the intersection of Richmond Terrace and Jersey Street after the end of the second quarter of 2015, but this impact would be limited to the Weekday PM period only. Like the proposed project, this impact can be mitigated by advancing the proposed mitigation for the With-Action condition at this location.

Finally, in terms of neighborhood character, the Wheel Only Alternative (with or without the potential waterborne transit landing) is expected to result in a positive effect on the neighborhood character in the study area, however to a lesser degree in comparison to the proposed project. The proposed project would enhance the area as an attractive gateway to Staten Island. Like the proposed project, 7.88 4.94-acres of publicly accessible active and passive open space would be introduced on the North Site further linking the St. George community with the waterfront. However, with the Wheel Only Alternative, the South Site would remain a surface parking lot (or possibly an expanded parking structure) separating Richmond Terrace from the waterfront.

### *NO UNMITIGATED TRAFFIC AND SUBWAY IMPACTS ALTERNATIVES*

The proposed project would result in a significant and unavoidable traffic impacts with respect to traffic at the Richmond Terrace and Ferry Viaduct (buses) intersection and a partially mitigated traffic impact at the Richmond Terrace and Ferry Viaduct (cars) intersection. The proposed project would also result in a significant and unavoidable transit impact on the northern platform stairs to/from the downtown R platform at the Whitehall Station and three intersections (Richmond Terrace and the Ferry Viaduct (cars), Richmond Terrace and the Ferry Viaduct (buses), and Richmond Terrace and Hamilton Avenue) and could potentially result in significant and unavoidable transit impacts on the Staten Island Ferry. Since the ferry is projected to potentially be over functional capacity in 2016 independent of the proposed project, alternatives to the proposed project were explored that would allow for the mitigation of all traffic (vehicular) and transit (subway) impacts only.

To eliminate all unmitigatable traffic and subway impacts, the proposed project would have to be reduced to either of the following development programs:

- Eliminate the entire North Site project (Observation Wheel, open space, etc.) and the entire South Site with the exception of the 200-room hotel. ~~reduce the South Site retail size from 340,000 square feet to approximately 15,000 square feet.~~
- Eliminate the entire South Site project (retail outlet center, hotel, catering facility, etc.), ~~and eliminate the Observation Wheel restaurant from the North Site,~~ and reduce the restaurant from 15,000 gsf to approximately 7,500 gsf.

Either of these development scenarios would result in a project of limited viability and would not achieve the City's goal to provide a comprehensive mixed-use development on both the North and South Sites. Neither alternative development scenario would redevelop the same

expanse of prime waterfront property as under the proposed project. In addition, compared with the proposed project, the alternative development scenarios would only provide additional upland connections to Richmond Terrace and the St. George neighborhood on either the North Site or South Site. Therefore, these alternatives are not considered feasible, and no further analysis is warranted.

## **B. NO ACTION ALTERNATIVE**

### **DESCRIPTION**

The No Action Alternative has been discussed as the “future without the proposed project” or as the “No-Action condition” in the technical chapters of this ~~DE~~FEIS. In the No Action Alternative, there would be no changes in the use of the project sites. Both the North Site and the South Site would remain surface public parking lots for the Ferry Terminal and the Stadium. With the No Action Alternative, Bank Street would remain a 24-foot roadway from Jersey Street to the easternmost boundary of the North Site. On completion, the reconstruction of the Wall Street Ramp between Richmond Terrace and Bay Street would increase the number of parking spaces on the South Site from 754 existing spaces to 810 spaces. Under the No Action Alternative, it is assumed that the waterborne transit landing would not be introduced ~~as could be implemented with the proposed project.~~

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

The following sections compare conditions under the No Action Alternative with conditions with the proposed project.

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

Unlike the proposed project, the No Action Alternative is not consistent with public policy seeking redevelopment opportunities and increased utilization of the waterfront. Under the No Action Alternative, existing conditions on the project sites would not change. The project sites would continue to be used as large surface parking lots. Existing zoning on the project sites and existing public policies are expected to remain in place.

Unlike the proposed project, the No Action Alternative would not convert the surface parking lots located on prime waterfront property into a vibrant mixed-use area or improve access to the waterfront from Richmond Terrace and the St. George community. As a result, the No Action Alternative would not be consistent with local planning goals, as described in New York City Economic Development Corporation (NYCEDC) and New York City Department of City Planning’s (DCP) *North Shore 2030* plan, to redevelop the St. George area with new public amenities and commercial space and improve overall mobility throughout the area or, as described in DCP’s *Vision 2020: New York City Comprehensive Waterfront Plan*, to repurpose former industrial space with facilities that promote public access to and enjoyment of the waterfront.

If the Bus Rapid Transit (BRT) alternative in the ~~Metropolitan Transportation Authority’s (MTA) New York City Transit’s (NYCT)~~ NYCT North Shore Alternative Analysis (NSAA) moves forward, the No Action Alternative would not require a refinement of the bus terminus at St. George as required by the proposed project in order to fully implement the South Site development program. However, as noted in Chapter 2, “Land Use, Zoning, and Public Policy,” NYCT is conducting additional design work to identify alternative designs for BRT terminal

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~~operations at St. George. The project remains under active consideration. there are no funding sources or anticipated implementation efforts pending for the BRT option and the proposed project is not considered an impediment to its future implementation.~~

### *SOCIOECONOMIC CONDITIONS*

Like the proposed project, the No Action Alternative would not result in any direct or indirect residential displacement, or adverse effects on specific industries. Unlike the proposed project, the No Action Alternative would not replace the existing surface parking lots with new commuter and visitor parking. Neither the proposed project nor the No Action Alternative would lead to significant adverse impacts due to indirect business displacement from increased rents. However, the No Action Alternative would not have the potential to spur decreases in retail vacancy rates or a broader retail offering within the study area, as the proposed project would.

Neither the proposed project nor the No Action Alternative would have a significant adverse indirect business displacement impact due to retail competition. While the No Action Alternative would not have potential to lead to limited indirect business displacement due to competition, the No Action Alternative also would not have the potential to generate increased retail traffic that could benefit existing retail businesses in the Staten Island Primary Trade Area. In addition, the No Action Alternative would not create jobs or help fill the gap in shoppers' goods retail in Staten Island.

### *COMMUNITY FACILITIES*

As with the proposed project, the No Action Alternative would not directly affect any community facility, nor would it contain a residential component that would place additional demands on the service delivery of any community facility.

### *OPEN SPACE*

Unlike the proposed project, the No Action Alternative would not ~~add~~ provide a net increase of approximately 7.81 ~~5.24~~ acres of publicly accessible active and passive open space on the North Site and South Site, but it would also not generate demand for such resources from new workers. With the No Action Alternative, the passive open space ratio would be lower than with the proposed project, but the passive open space ratios under either alternative would exceed the DCP's planning goals. Neither the proposed project nor the No Action Alternative would result in any significant adverse direct impacts to open space related to shadows, air quality, noise, or odors. Furthermore, unlike the proposed project, the No Action Alternative would not provide better access between the North Shore Waterfront Esplanade and upland St. George.

### *SHADOWS*

The No Action Alternative would have none of the incremental increases in shadows associated with the proposed project, since this alternative would not result in any new development on the project sites. As described in Chapter 6, "Shadows," while the proposed project would cast some incremental shadow onto portions of Richmond Terrace Greenstreets, the North Shore Waterfront Esplanade, and the Upper New York Bay in all seasons, the extent and duration of such incremental shadow would not be large or long enough to cause a significant adverse impact on any of these resources. Therefore, neither the No Action Alternative nor the proposed project would have significant adverse shadow impacts.

## *HISTORIC RESOURCES*

### *Archaeological Resources*

While the proposed project would result in ground disturbance that could potentially affect archeological resources, the No Action Alternative would not alter current conditions. However, since the New York City Landmarks Preservation Commission (LPC) has determined that the project sites are not sensitive for archaeological resources, neither the No Action Alternative nor the proposed project would adversely affect archaeological resources.

### *Architectural Resources*

With the No Action Alternative, there would be no change in the use of the project sites, and thus no change to the context of architectural resources in the surrounding area. Like the proposed project, the No Action Alternative would not have a significant adverse impact on architectural resources.

## *URBAN DESIGN AND VISUAL RESOURCES*

In the No Action Alternative, the project sites would continue to be occupied by surface parking lots. The No Action Alternative, like the proposed project, would not result in a significant adverse impact to urban design or visual resources. However, in contrast to the proposed project, the No Action Alternative would not offer enhancements to urban design by activating the project sites with the Observation Wheel, retail, commercial, hotel, and theater and exhibition space uses, would not provide an enhanced pedestrian experience on the St. George waterfront, and would not improve connections to upland areas.

The No Action Alternative would not create new structures visible from near and long views to and from the project sites, particularly the 625-foot-tall Observation Wheel. With the proposed project, the visibility of the Observation Wheel in surrounding views would be variable, based on intervening buildings, street trees and other landscaping and vegetation, as well as the screening effects of distance and the Wheel's light-colored metalwork. That structure, while a prominent visual element of the proposed project, is not expected to result in significant adverse impacts based on its generally open frame construction and light-colored metalwork. The lighting program on the North and South Sites that would be introduced with the proposed project would not be introduced in the No Action Alternative. However, as described in Chapter 8, "Urban Design and Visual Resources," the lighting program that would be introduced by the proposed project on the North Site would be designed and managed to avoid new lighting on the land side portion thereby minimizing night lighting effects on the inland community. On the South Site with the proposed project, it is currently envisioned that the hotel and landscaping would be accented by uplighting; lighting would also be provided on storefronts, building facades, and imbedded within the landscaping. The lighting design would be mindful of the adjacent waterfront, residential areas, and adjacent NYCDOT Ferry operations. Therefore, like the proposed project, the No Action Alternative would not have a significant adverse impact on urban design and visual resources.

## *NATURAL RESOURCES*

The condition of water quality, aquatic biota, wetlands, floodplains, groundwater, and terrestrial natural resources within and near the project sites would remain generally unchanged with the proposed project and under the No Action Alternative. However, the No Action Alternative

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would not result in changes to the existing limited on-site natural resources, including the small areas of manicured lawn with trees, ruderal vegetation, and disturbance-tolerant wildlife species that are on the project sites, and the existing stormwater management system would remain in place. ~~The No Action Alternative would not provide the benefit of reducing existing impervious surface coverage through landscaping and building green roofs, thereby decreasing stormwater and flooding and benefitting water quality, regulated areas of tidal wetland, and aquatic biota offshore. The NYSDEC tidal wetland adjacent area that occurs within the waterfront lots containing the North Site, Bank Street Expansion Area, and South Site would continue to exceed the 20 percent impervious cover limit for the adjacent area, and would continue to provide a limited buffer to the NYSDEC tidal wetlands of the Upper Bay and limited wildlife habitat when compared to the proposed project.~~ While the No Action Alternative would not result in potential sediment suspension and harbor bottom disturbance during operation of the potential waterborne transit landing, such suspension and disturbance would not be expected to have significant adverse impacts under the proposed project.

Lastly, unlike the proposed project, night lighting would not be introduced in the No Action Alternative. However, as discussed in Chapter 9, "Natural Resources," the proposed project would establish night-lighting best management practices and an active monitoring program, particularly during bird migration seasons; therefore, collisions of birds with the Wheel would likely be rare and would not be expected to amount to a source of mortality that would be capable of affecting their population sizes and would not be considered a significant adverse impact. Therefore, like the proposed project, the No Action Alternative would not have a significant adverse impact on natural resources.

### *HAZARDOUS MATERIALS*

With the No Action Alternative, there would be no anticipated disturbances or excavation into potentially contaminated soils or groundwater. As discussed in Chapter 10, "Hazardous Materials," the North Site, ~~and the northern half of the South Site, and the southern half of the Bank Street Expansion (south of St. Peter's Place)~~ were previously remediated under a Voluntary Cleanup Agreement (VCA) (Site Number V-00228) with the New York State Department of Environmental Conservation (NYSDEC) as a part of the Stadium project. With the No Action Alternative, the "VCA Site" would remain subject to NYSDEC oversight (including annual certification requirements).

Without excavation and redevelopment on the remainder of the project area, there would be no potential for exposure to its subsurface contaminants. As such, in the No Action Alternative, although there would be no additional clean-up of hazardous materials, there would be no potential for human or environmental exposure. Neither the proposed project nor the No Action Alternative would result in significant adverse impacts related to hazardous materials.

### *WATER AND SEWER INFRASTRUCTURE*

Under the No Action Alternative, the North and South Sites would remain surface public parking lots, and would continue to generate no water or sanitary sewage demand while stormwater runoff would remain the same as in the existing condition. The impervious surfaces in the No Action Alternative would remain as in the existing condition unlike under the proposed project where proposed landscaping plans and green roofs would ~~reduce existing impervious surface coverage, thereby decreasing~~ slightly reduce the amount of stormwater runoff. While the proposed project would generate additional domestic water and sanitary

sewage demand, and would require reconstruction of the existing stormwater management system, this demand would be accommodated within the existing infrastructure capacities, and would not be expected to generate significant adverse impacts on water or sanitary sewer infrastructure.

#### *SOLID WASTE AND SANITATION SERVICES*

Unlike the proposed project, the No Action Alternative would not generate additional solid waste; however, neither the No Action Alternative nor the proposed project would result in significant adverse impacts on solid waste and sanitation services.

#### *ENERGY*

Unlike the proposed project, the No Action Alternative would not increase demand on electricity. However, the increase in electricity demand generated by the proposed project would be insignificant relative to the capacity of these systems and the current levels of service in the Con Edison service area. Therefore, neither the No Action Alternative nor the proposed project would result in significant adverse impacts with respect to the transmission or generation of energy. In addition, unlike the proposed project, the No Action Alternative would not result in the development of renewable energy generation systems, including solar panels and wind turbines.

#### *TRANSPORTATION*

Under the No Action Alternative, the project sites would continue to be used as surface parking and no new project trips would be generated. As a result, the No Action Alternative would not result in the significant adverse traffic impacts at 14 13 intersections, ~~or~~ the significant and unavoidable traffic impacts at 1 3 intersections, and the partially mitigatable traffic impact at 1 intersection caused by the proposed project. In addition, the No Action Alternative would not result in the potential significant adverse transit impacts on ~~the Staten Island Ferry or the northern platform stairs to/from the downtown R platform at the Whitehall Station.~~ Under the No Action Alternative, the Staten Island Ferry is projected to be over functional capacity in 2016 independent of the proposed project.

#### *AIR QUALITY*

The No Action Alternative would not introduce new mobile or stationary sources of air quality pollutants and, like the proposed project, would have no significant adverse impact on air quality. The detailed analysis of the proposed project finds that the new traffic generated by the proposed uses, and the stationary source emissions generated by the development's on-site infrastructure and parking garages would not result in any violations of air quality standards or incremental changes considered as project generated impacts.

#### *GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE*

The No Action Alternative would not result in an increase of Greenhouse Gas Emissions (GHG) at the project sites. However, the No Action Alternative would not convert large surface parking lots on waterfront property into a vibrant mixed-use area that capitalizes on existing transportation infrastructure. ~~With the continued use as a surface parking lot at existing grade, the No Action Alternative would be less resilient to the potential effects of climate change than the proposed project.~~ An assessment of the No Action Alternative with the City's emission

reduction goal would not be required. The No Action Alternative would not result in new renewable energy sources or a sustainability exhibition, which are part of the proposed project.

*NOISE*

The No Action Alternative would not introduce new traffic-generated or on-site sources of noise and, like the proposed project, would have no significant adverse noise impacts.

*PUBLIC HEALTH*

Like the proposed project, the No Action Alternative would not result in significant adverse impacts on public health.

*CONSTRUCTION*

Unlike the proposed project, the No Action Alternative would not generate the anticipated three years of construction activities (late 2013 to late 2016). However, although there would be localized, temporary disruptions due to construction activity, as is the case with any construction activity, the proposed project is not expected to result in any significant adverse impacts due to construction activities. As detailed in Chapter 20, “Construction,” this finding is based on an analysis of the types of construction activities and their intensity, the location of sensitive receptors that could be affected by the proposed project’s construction, and the overall construction duration.

*NEIGHBORHOOD CHARACTER*

In the No Action Alternative, the study area’s diverse set of elements—including its mix of transportation, open space, institutional uses, the Stadium, and its location on the waterfront—would remain unchanged. Like the proposed project, the No Action Alternative would not generate significant adverse impacts but it would continue to limit the vitality and character of the St. George waterfront by leaving the surface parking lots in place and isolating the waterfront from upland St. George. In comparison, the proposed project is expected to result in a positive effect on the neighborhood character in the study area. The proposed project would enhance the area as an attractive gateway to Staten Island. The project sites would be more inviting and appealing to visit with a mix of new retail and commercial uses, new landscaping as well as passive and active open space. The proposed project would improve connectivity between the waterfront and the upland areas, which would be beneficial to the neighborhood.

**C. ST. GEORGE RETAIL DEVELOPMENT ONLY ALTERNATIVE**

**DESCRIPTION**

The St. George Retail Development Only Alternative would develop the same types and amounts of retail, hotel, catering space, and back of house and mechanical uses that would be introduced on the South Site in the future with the proposed project. This Alternative would also provide parking to replace any parking displaced by project construction and additional parking to meet the needs of the proposed development. With the St. George Retail Development Only Alternative, there could still be the potential addition of a waterborne transit landing, which would be located at the end of the Wall Street ramp as currently described in Chapter 1, “Project Description.”

The St. George Retail Development Only Alternative would be configured with the same design and program as set forth in the proposed project—a 340,000 gsf terraced retail outlet center, a 130,000 gsf (200-room) hotel, a 20,000 gsf catering facility, and 40,000 square feet of back of house and mechanical space. Similar to the proposed project, the St. George Retail Development Only Alternative would also deck over (but not eliminate) the RROW located on that site. While the proposed project contains 1,250 parking spaces on the South Site, it is possible that under the St. George Retail Development Only Alternative a portion of the parking could be distributed between the North Site and South Site. With the St. George Retail Development Only Alternative, Bank Street would remain a 24-foot roadway from Jersey Street to the easternmost boundary of the North Site.

With the St. George Retail Development Only Alternative, it is possible that additional retail and commercial development could be accommodated in lieu of the demand previously identified for the Wheel portion of the proposed project. If a larger project were contemplated, it would likely require supplemental environmental analysis with a scope of assessment determined if and when such a change is considered.

As discussed in Chapter, 1, “Project Description,” it is possible that the project sites could be developed with a No Catering Facility Scenario. Findings for the No Catering Facility Scenario would be similar to the findings for the St. George Retail Development Only Alternative.

## **ST. GEORGE RETAIL DEVELOPMENT ONLY ALTERNATIVE COMPARED WITH THE PROPOSED PROJECT**

The following sections compare conditions under the St. George Retail Development Only Alternative with conditions with the proposed project.

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

Like the proposed project, the St. George Retail Development Only Alternative would not result in any significant adverse impacts to land use, zoning, or public policy. The potential addition of the waterborne transit landing would also not result in significant adverse impacts.

While the St. George Retail Development Only Alternative would activate and enliven the waterfront with a new retail outlet center on the South Site, the North Site would remain a surface parking lot, or possibly with an expanded parking structure to accommodate a portion of the existing and South Site project-generated parking demand. While there would be a net increase of approximately ~~0.14~~ 0.09 acres of passive open space with the St. George Retail Development, this alternative would not provide the net increase of 7.72 ~~4.94~~ acres of publicly accessible passive and active open space on the North Site that would be introduced by the proposed project. Since the St. George Retail Development Only Alternative would enhance upland connections only on the South Site, but would not redevelop the same expanse of prime waterfront property, this alternative would not support local planning goals to the same degree as the proposed project. These goals include the redevelopment of St. George, reuse of former industrial space, and promotion of public access to and enjoyment of the waterfront, as described in DCP’s *Vision 2020: New York City Comprehensive Waterfront Plan* or DCP’s *North Shore 2030* plan.

Like the proposed project, the St. George Retail Development Only Alternative would require a refinement of the bus terminus at St. George should the BRT alternative in ~~MTA’s~~ NYCT’s NSAA move forward. Currently, NYCT is conducting additional design work to identify alternative designs for BRT terminal operations at St. George ~~There are no funding sources or~~

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~~anticipated implementation efforts pending for the BRT option~~ and the St. George Retail Development Only Alternative would not be considered an impediment to its future implementation.

### *SOCIOECONOMIC CONDITIONS*

The St. George Retail Development Only Alternative (with or without the potential waterborne transit landing), like the proposed project, would not result in significant adverse impacts to socioeconomic conditions. The St. George Retail Development Only Alternative would not result in any direct or indirect residential displacement, or adverse effects on specific industries. Neither the proposed project nor the St. George Retail Development Only Alternative would lead to significant adverse impacts due to indirect business displacement from increased rents, and both alternatives would have the potential to spur decreases in retail vacancy rates and broader retail offering within the study area.

Both the proposed project and the St. George Retail Development Only Alternative would have the potential to lead to limited indirect business displacement due to retail competition, but this potential displacement would not result in a significant adverse impact. Either alternative has the potential to generate increased retail traffic that could benefit existing retail businesses in the Staten Island Primary Trade Area. However, without the Wheel, daily visitation to the project sites under the St. George Retail Development Only Alternative would likely be less than anticipated under the proposed project, and any benefit from increased retail traffic in the study area may be less pronounced.

### *COMMUNITY FACILITIES*

As with the proposed project, the St. George Retail Development Only Alternative (with or without the potential waterborne transit landing) would not directly affect any community facility, nor would it contain a residential component that would place additional demands on the service delivery of any community facility.

### *OPEN SPACE*

The St. George Retail Development Only Alternative would result in a net increase of ~~0.09~~ 0.14 acres of passive open space on the South Site. Since this alternative (with or without the potential waterborne transit landing) would not include redevelopment of the North Site with the Wheel, Wheel Terminal Building, and its parking structure with a green roof, it would not ~~add~~ provide a net increase of 7.72 4.94 acres of publicly accessible active and passive open space. However, compared with the proposed project, the St. George Retail Development Only Alternative would also generate somewhat less demand for open space resources from new workers. Passive open space ratios under either alternative would exceed DCP's planning goals, and neither the proposed project nor the St. George Retail Development Only Alternative would result in any significant adverse direct impacts to open space related to shadows, air quality, noise, or odors.

### *SHADOWS*

The St. George Retail Development Only Alternative, like the proposed project, would not generate significant adverse impacts from shadows on adjacent sun sensitive resources. The shadows generated by the retail development on the South Site would be the same for the St. George Retail Development Only Alternative and the proposed project. While the St. George

Retail Development Only Alternative would not include the 625-foot-tall Observation Wheel, that structure has been determined to not create an adverse shadow impact primarily based on the open framework of the structure and the limited area it would cast shadows. The addition of the potential waterborne transit landing with the St. George Retail Development Only Alternative would similarly not generate significant adverse impacts on sun sensitive resources.

### *HISTORIC RESOURCES*

#### *Archaeological Resources*

The St. George Retail Development Only Alternative (with or without the potential waterborne transit service) would result in less ground disturbance on the South Site compared with the proposed project, which anticipates disturbance across both the North and South Sites. If a new parking structure on the North Site were contemplated, then the likelihood of ground disturbance on both sites would be similar to the proposed project. However, since LPC has determined that neither project site is sensitive for archaeological resources, neither the St. George Retail Development Only Alternative nor the proposed project would adversely affect archaeological resources.

#### *Architectural Resources*

As there are no known or potential architectural resources located on either the North Site or South Site, neither the St. George Retail Development Only Alternative nor the proposed project would have any direct or indirect impacts to on-site architectural resources.

The height of the hotel included in both the St. George Retail Development Only Alternative and the proposed project would be greater than nearly all of the existing structures on the inland side of Richmond Terrace; however the St. George Retail Development Only Alternative, like the proposed project, would not be anticipated to significantly alter the visual prominence of architectural resources in this portion of the study area. Views to the resources on Richmond Terrace from certain portions of Bank Street and the waterfront esplanade could potentially be obscured by the proposed development in both the St. George Retail Development Only Alternative and the proposed project; however, any development of these sites would be anticipated to limit such views compared with existing conditions. In their present condition as parking lots, the North and South Sites do not contribute to or enhance the setting of the resources in these views. In no case would views of the resources from these locations be fully obstructed.

Compared with the proposed project with the tall Observation Wheel, and its Wheel Terminal Building and parking structure with the rooftop open space, the St. George Retail Development Only Alternative would result in less extensive or prominent views to and from architectural resources along Richmond Terrace. It would not be visible in views from other known and potential architectural resources identified in the study area. However, as described in Chapter 7, "Historic and Cultural Resources," the Observation Wheel would be a unique but not incompatible visual element within the setting of the study area's known and potential architectural resources. In both the St. George Retail Development Only Alternative and the proposed project, the anticipated changes to the settings and views of the study area's architectural resources would not adversely affect the characteristics for which the historic properties meet or may meet State and National Register (S/NR) and New York City Landmarks (NYCL) criteria. Therefore, neither the St. George Retail Development Only Alternative nor the proposed project would have a significant adverse impact on architectural resources.

*URBAN DESIGN AND VISUAL RESOURCES*

The St. George Retail Development Only Alternative would be more active and would enhance the pedestrian experience of the South Site compared with the existing condition, but such improvements would be more limited than under the proposed project, since the St. George Retail Development Only Alternative would develop only the South Site, leaving the North Site as an open surface parking lot (or an expanded parking structure). Similarly, the St. George Retail Development Only Alternative would provide enhanced connections to upland areas only on the South Site, while the proposed project would improve upland connections across both the North and South Sites.

Because it does not include the Observation Wheel, only the hotel portion of the St. George Retail Development Only Alternative is anticipated to be visible in some views within or from just outside of the study area beyond the immediate Richmond Terrace frontage. With the St. George Retail Development Only Alternative, the addition of new structures on the South Site would not significantly alter the visual character of the study area and also would not screen or eliminate any views to visual resources. Compared with the proposed project, the St. George Retail Development Only Alternative would be much less visible in longer views toward the project sites, including views from across New York Harbor. However, as stated in Chapter 8, “Urban Design and Visual Resources,” the Observation Wheel that would be introduced with the proposed project would be a unique, but not incompatible visual element within the setting of the study area’s visual resources. Therefore, neither the proposed project nor the St. George Retail Development Only Alternative would result in a significant adverse impact to urban design or visual resources.

The lighting program on the South Site that would be introduced with the proposed project would be introduced with this alternative; however, no lighting would be introduced on the North Site. As described in Chapter 8, “Urban Design and Visual Resources,” the lighting design on the South Site would be mindful of the adjacent waterfront, residential areas, and adjacent NYCDOT Ferry operations. Therefore, like the proposed project, the St. George Retail Development Only Alternative would not have a significant adverse impact on urban design and visual resources.

*NATURAL RESOURCES*

As described in Chapter 9, “Natural Resources,” the condition of water quality, aquatic biota, wetlands, floodplains, groundwater, and terrestrial natural resources within and near the project sites would remain generally unchanged following completion of the proposed project. This would also be the case for the St. George Retail Development Only Alternative (with or without the potential waterborne transit landing), which is essentially a subset of the proposed project. The St. George Retail Development Only Alternative, like the proposed project, would result in a net increase in vegetation cover (though more limited without the North Site green roof and open space) which would potentially benefit some wildlife such as insects and songbirds. The increase in impervious surface would be smaller than that of the proposed project, but as discussed for the proposed project, the proposed NYCDOT service road near the South Site would be within the NYSDEC tidal wetlands adjacent area and would require authorization under Article 25 of the ECL. However, neither the St. George Retail Development Only Alternative nor the proposed project would have significant adverse impacts to natural resources or floodplains in the area, and with the implementation of stormwater management measures, the increase in impervious surface would not adversely affect water quality, aquatic biota, or

NYSDEC littoral zone tidal wetlands of the Upper New York Harbor within the vicinity of the project site and both may slightly improve water quality by increasing pervious surface coverage and improving stormwater capture. The St. George Retail Development Only Alternative would not include the tall Observation Wheel thus minimizing or avoiding the potential night lighting concerns associated with bird strikes and disruption to migration patterns. However, as noted in Chapter 9, “Natural Resources,” the implementation of a best practices management and monitoring program for night lighting would be expected to minimize the potential for adverse impacts with night lighting of the Observation Wheel.

#### *HAZARDOUS MATERIALS*

Like the proposed project, the St. George Retail Development Only Alternative would require ground disturbance on portions of the VCA Site, which encompasses the North Site, ~~and the northern half of the South Site, and the southern half of the Bank Street Expansion (south of St. Peter’s Place).~~ and is currently subject to NYSDEC approval of procedures for redevelopment of the VCA Site. The St. George Retail Development Only Alternative would require development of a Remedial Action Plan (RAP) and Construction Health and Safety Plan (CHASP) similar to those that would be developed for the proposed project. With such measures in place, neither the St. George Retail Development Only Alternative nor the proposed project would result in significant adverse impacts related to hazardous materials.

#### *WATER AND SEWER INFRASTRUCTURE*

Increases in demand for water supply and sanitary sewage generation would be marginally less with the St. George Retail Development Only Alternative compared with the proposed project. Of the approximately ~~155,400~~ 151,564 gallons per day (gpd) of domestic water use and sewage generation expected with the proposed project, about 138,400 gpd would be generated by the St. George Retail Development component. However, these increases would be minimal under both the St. George Retail Development Only Alternative and the proposed project and would not significantly impact existing city infrastructure.

Like the proposed project, the St. George Retail Development Only Alternative would implement Best Management Practices such as green roofs and roof detention. As a result, while the stormwater collection and outfall system may require reconstruction as part of the St. George Retail Development Only Alternative and the proposed project, stormwater runoff discharge would not result in any significant adverse impacts.

The potential waterborne transit service would not generate additional water or sewage demand and has no incremental effect on either the proposed project or the St. George Retail Development Only Alternative.

#### *SOLID WASTE AND SANITATION SERVICES*

The St. George Retail Development Only Alternative would generate about one third fewer pounds per week of solid waste than the proposed project (approximately 131,500 pounds per week for the St. George Retail Development Only Alternative compared with approximately 174,000 pounds per week for the proposed project). Neither the proposed project nor the St. George Retail Development Only Alternative would result in significant adverse impacts on solid waste and sanitation services.

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*ENERGY*

The increase in demand for electricity would be less with the St. George Retail Development Only Alternative compared with the proposed project. However, the increase in electricity demand generated by either scenario would be insignificant relative to the capacity of these systems and the current levels of service in the Con Edison service area, and neither the St. George Retail Development Only Alternative nor the proposed project would result in significant adverse impacts with respect to the transmission or generation of energy.

*TRANSPORTATION*

Under the St. George Retail Development Only Alternative, the land uses on the South Site, including a retail outlet center, a hotel, and a catering facility, along with the same number of parking spaces (up to ~~1,241~~ 1,250 spaces), would be developed to the same scale as under the proposed project. The St. George Retail Development Only Alternative would not include the Observation Wheel, Wheel Terminal Building, and passive and active open space included on the North Site in the proposed project, and would not include the proposed access to the North Site on Richmond Terrace at Nicholas Street.

As a result, the traffic, pedestrian, and transit trips and parking demand generated by this alternative would be less than the trip generation estimates shown in Tables 14-~~42~~ 36 and 14-~~43~~ 37 (see Chapter 14, “Transportation”).

*Traffic*

The St. George Retail Development Only Alternative would generate ~~14, 16, 8, and 15~~ 18, 19, 12, and 18 percent fewer vehicle trips than proposed project in the Weekday MD, Weekday PM, Saturday MD, and Saturday PM peak hours, respectively. **Table 21-1** compares the vehicular trip generation from the proposed project and the St. George Retail Development Only Alternative.

**Table 21-1  
Comparison of Vehicle Trips Generated by the  
St. George Retail Development Only Alternative and the Proposed Project**

<u>Peak Hour</u>	<u>Proposed Project</u>			<u>St. George Retail Development Only Alternative</u>			<u>Net Difference</u>		
	<u>In</u>	<u>Out</u>	<u>Total</u>	<u>In</u>	<u>Out</u>	<u>Total</u>	<u>In</u>	<u>Out</u>	<u>Total</u>
<u>Weekday Midday</u>	534	544	1078	460	467	926	-74	-77	-152
<u>Weekday PM</u>	548	521	1069	466	437	903	-82	-84	-166
<u>Saturday Midday</u>	711	864	1575	647	799	1446	-64	-64	-129
<u>Saturday PM</u>	578	702	1281	478	616	1094	-100	-86	-187

*Note: In plus Out trips may not equal Total trips due to rounding.*

<u>Peak Hour</u>	<u>Proposed Project</u>			<u>St. George Retail Development Only Alternative</u>			<u>Net Difference</u>		
	<u>In</u>	<u>Out</u>	<u>Total</u>	<u>In</u>	<u>Out</u>	<u>Total</u>	<u>In</u>	<u>Out</u>	<u>Total</u>
<u>Weekday Midday</u>	534	543	1077	438	448	886	-96	-96	-192
<u>Weekday PM</u>	548	520	1068	445	418	863	-103	-103	-205
<u>Saturday Midday</u>	711	863	1574	616	768	1384	-95	-95	-190
<u>Saturday PM</u>	578	702	1279	463	587	1049	-115	-115	-230

The St. George Retail Development Only Alternative would result in significant adverse traffic impacts. However, because the trips generated by the Observation Wheel, Wheel Terminal Building, and passive and active open space land uses proposed on the North Site as part of the proposed project would no longer be generated, the St. George Retail Development Only Alternative would result in fewer impacted locations than the proposed project during each of the peak hours studied. The number of impacted intersections during each peak hour is summarized below:

- Weekday MD: 13 impacted locations, which is the same as the number of impacted locations for the proposed project.
- Weekday PM: ~~13~~ 14 impacted locations, ~~which is the same as the number of impacted locations compared with 14 impacted locations~~ for the proposed project.
- Saturday MD: ~~13~~ 12 impacted locations, ~~which is the same as the number of impacted locations for the 12 impacted locations compared with 13 impacted locations for the~~ proposed project.
- Saturday PM: ~~12~~ 13 impacted locations compared with 15 impacted locations for the proposed project.

It is likely that the measures required to mitigate the impacted locations under this alternative would be of the same or lesser magnitude than for the proposed project. For example, fewer seconds of green time would need to be reallocated at an impacted location under the St. George Retail Development Only Alternative than would be required for the proposed project at the same impacted intersection. The exception is the intersection of Richmond Terrace and Wall Street. Without the land uses on the North Site, the retail outlet center on the South Site would generate a greater number of new trips, as there would be no linked trips with the uses on the North Site. Additionally, the proposed project improvement at the Richmond Terrace and Nicholas Street intersection would not be constructed as part of the St. George Retail Development Only Alternative, and all commuters would have to enter/exit the site from Richmond Terrace at Jersey Street and Wall Street. As a result, the traffic volumes at the Richmond Terrace and Wall Street intersection would be greater than with the proposed project and would require further mitigation than what is proposed for this location in Chapter 22, "Mitigation Measures". To mitigate traffic impacts at this location, 4 seconds of green time from the eastbound/westbound phase would be shifted to the northbound/southbound phase during the Saturday PM peak.

If this alternative is selected versus the proposed project, the developer would be required to identify specific mitigation at all other study locations.

As the trips generated by the Observation Wheel, Wheel Terminal Building, and passive and active open space land uses proposed on the North Site as part of the proposed project would not be generated, the St. George Retail Development Only Alternative would not result in a significant and unavoidable impact at the intersection of Richmond Terrace and Hamilton Avenue. However, The St. George Retail Development Only Alternative would result in significant and unavoidable adverse traffic impacts at the intersections ~~on~~ of Richmond Terrace and at the Ferry Viaduct (cars) and the Ferry Viaduct (buses) during all four peak hours. The Wheel Only Alternative would also result in the partially mitigated significant and unavoidable impact at the Richmond Terrace at the Ferry Viaduct (cars) for all peak hours.

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*Parking*

The St. George Retail Development Only Alternative would provide for a parking structure on the South Site, and the North Site would continue to be a surface parking lot or would be developed into structured parking. Up to 1,241 ~~1,250~~ parking spaces would be provided on the South Site, while maintaining the current number of surface parking spaces that exist on the North Site. The total existing commuter parking supply would be provided between the two sites, in addition to the parking supply for the South Site, for a total of 2,057 ~~2,066~~ parking spaces. The total number of parking spaces that would be introduced with the St. George Retail Development Only Alternative would be less than the parking supply that would be generated by the proposed project (2,191 ~~2,200~~ total spaces). The peak parking accumulation is as follows:

- Weekday (No Staten Island Yankees game): 2,015 ~~1,978~~ parking spaces at 1:00 PM ~~12:00 PM~~
- Weekday (With Staten Island Yankees game): 2,054 ~~1,989~~ parking spaces at 1:00 PM
- Saturday (No Staten Island Yankees game): 1,431 ~~1,390~~ parking spaces at 2:00 PM
- Saturday (With Staten Island Yankees game): 1,741 ~~1,727~~ parking spaces at 6:00 PM

As the peak parking demand does not exceed the total supply of 2,057 ~~2,066~~ parking spaces, the St. George Retail Development Only Alternative would not result in a shortfall of parking or any significant adverse parking impacts.

*Transit*

The St. George Retail Development Only Alternative would generate 67, 64, 63, and 63 ~~69, 66, 66, and 65~~ percent fewer Staten Island Ferry trips than the proposed project in the Weekday MD, Weekday PM, Saturday MD, and Saturday PM peak hours, respectively. **Table 21-2** compares the Staten Island Ferry trip generation from the proposed project and the St. George Retail Development Only Alternative.

**Table 21-2**  
**Comparison of Staten Island Ferry Trips Generated by the**  
**St. George Retail Development Only Alternative and the Proposed Project**

<u>Peak Hour</u>	<u>Proposed Project</u>			<u>St. George Retail Development Only Alternative</u>			<u>Net Difference</u>		
	<u>In</u>	<u>Out</u>	<u>Total</u>	<u>In</u>	<u>Out</u>	<u>Total</u>	<u>In</u>	<u>Out</u>	<u>Total</u>
<u>Weekday Midday</u>	1285	1220	2505	450	380	830	-836	-840	-1676
<u>Weekday PM</u>	1334	1312	2647	492	467	959	-843	-845	-1688
<u>Saturday Midday</u>	1388	1409	2797	509	530	1039	-879	-879	-1759
<u>Saturday PM</u>	1067	1484	2551	258	697	955	-809	-787	-1596

Note: In plus Out trips may not equal Total trips due to rounding.

<u>Peak Hour</u>	<u>Proposed Project</u>			<u>St. George Retail Development Only Alternative</u>			<u>Net Difference</u>		
	<u>In</u>	<u>Out</u>	<u>Total</u>	<u>In</u>	<u>Out</u>	<u>Total</u>	<u>In</u>	<u>Out</u>	<u>Total</u>
<u>Weekday Midday</u>	1285	1220	2505	420	354	774	-866	-866	-1732
<u>Weekday PM</u>	1334	1312	2647	463	441	903	-872	-872	-1743
<u>Saturday Midday</u>	1388	1409	2797	466	487	952	-923	-923	-1845
<u>Saturday PM</u>	1067	1484	2551	239	656	894	-828	-828	-1656

The St. George Retail Development Only Alternative could result in significant adverse transit impacts on the Staten Island Ferry. Although the Ferry trips generated by the Observation Wheel, Wheel Terminal Building, and passive and active open space land uses proposed on the North Site as part of the proposed project would no longer be generated, the St. George Retail Development Only Alternative could still result in impacts on the Staten Island Ferry during all four peak hours. The impacts noted are a function of the throughput capacity as determined by NYCDOT, which is limited by the width of the boarding aprons and the ability to process passengers during the 6.5-minute time window currently allotted in the printed schedules. At all times, and specifically during each of the above single landing cycles, the ferries and ferry terminals themselves would have sufficient licensed capacity to accommodate the projected ridership. The St. George Retail Development Only Alternative would not result in any other significant adverse transit impacts.

The St. George Retail Development Only Alternative would still result in a significant adverse transit impact on the northern platform stairs to/from the downtown R platform at the Whitehall Station during the Weekday PM peak hour. However, compared with the proposed project, the required widening is based on a WIT of 2.34 inches, a difference of 4.62 inches.

#### *Pedestrians*

Because the St. George Retail Development Only Alternative would not include any development on the North Site that would generate new pedestrian trips, it would generate fewer pedestrian trips than the proposed project. As no pedestrian impacts would be expected with the proposed project, the St. George Retail Development Only Alternative would also not result in significant adverse pedestrian impacts.

#### *No-Catering Facility Scenario*

The impacts and proposed mitigation for the No-Catering Facility Scenario for the St. George Retail Development Only Alternative are expected to be similar to the findings for the No-Catering Facility Scenario compared to the proposed project as described in Chapter 14, Transportation.

#### *Potential Retail Outlet Center Expansion*

It is possible that the St. George Retail Development Only Alternative would include increased retail outlet center development on the North and/or South Sites, with additional parking spaces constructed on the North Site to accommodate the increased retail parking demand. If less than 52,000 ~~55,400~~ square feet of additional retail outlet center would be developed, the St. George Retail Development Only Alternative would result in generally the same number of vehicle trips as the proposed project, and therefore result in generally the same impacts as the proposed project. Should the St. George Retail Development Only Alternative seek to create a retail project with an expansion of greater than 52,000 ~~55,400~~ square feet of additional retail outlet center development, it would more than likely require a supplemental environmental assessment.

#### *AIR QUALITY*

The St. George Retail Development Only Alternative would generate fewer vehicle trips to and from the project sites than the proposed project and would result in proportionally less mobile source air quality pollutants. Similarly, the alternative would generate less overall stationary source emissions since there would be no new structures on the North Site requiring heating or

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ventilation. Therefore, the St. George Retail Development Only Alternative, like the proposed project, would not generate significant adverse impacts on air quality. Since the potential waterborne transit service was not found to result in significant adverse impacts with the proposed project, it would similarly not generate impacts in the St. George Retail Development Only Alternative.

### *GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE*

The St. George Retail Development Only Alternative would result in 15,206 metric tons of CO<sub>2</sub>e per year, less annual GHG emissions than the proposed project (estimated at 20,067 metric tons of CO<sub>2</sub>e). With the St. George Retail Development Only Alternative, less building energy would be needed and fewer trips would be generated than with the proposed project. The St. George Retail Development Only Alternative, as with the proposed project, would strive to obtain the United States Green Building Council's (USGBC) Leadership in Energy and Environmental Design (LEED) Silver certification. Specific sustainable measures would be incorporated into the design and construction of the proposed project to qualify for LEED rating, which would decrease the potential GHG emissions. The proposed project's design would include features to improve resiliency to climate change, including sea level rise. Based on the sustainable measures that would be included, the proposed project would be consistent with the City's emissions reduction goal, as defined in the *CEQR Technical Manual*.

### *NOISE*

Compared with the proposed project, the St. George Retail Development Only Alternative would result in a proportionate reduction of new traffic-generated or on-site sources of noise. Like the proposed project, the St. George Retail Development Only Alternative would not result in significant adverse impacts on any of the closest sensitive receptor locations.

In terms of CEQR Noise Exposure Guidelines, both the St. George Retail Development Only Alternative and the proposed project would have noise levels at receptor sites 1, 2, and 3 that would remain in the "marginally unacceptable" category while noise levels would remain above the 55 dBA L<sub>10(1)</sub> noise level guideline for outdoor areas requiring serenity and quiet provided in the *CEQR Technical Manual* noise exposure guidelines) at receptor Site 4, and noise levels would remain in the "marginally acceptable" category at Site 5.

As with the proposed project, development of the St. George Retail Development Only Alternative would continue to require noise attenuation along the western façade of the hotel (31 dBA) and commercial structure (28 dBA).

### *PUBLIC HEALTH*

Like the proposed project, the St. George Retail Development Only Alternative would not result in significant adverse impacts on public health.

### *CONSTRUCTION*

Construction activities, phasing, and overall timeframe for the St. George Retail Development Only Alternative would be essentially the same as described in detail for the South Site in Chapter 20, "Construction." As a result, the alternative would continue to result in localized and temporary disruptions due to construction activity, but, like, Similar to the proposed project, it is ~~not expected to~~ that the construction activities associated with the St. George Retail

Development Only Alternative would result in any significant adverse impacts due to construction activities with respect to vehicular traffic at the intersection of Richmond Terrace and Jersey Street after the end of the second quarter of 2015. This impact can be mitigated by advancing the proposed mitigation for the With-Action condition at this location, as described in Chapter 22, "Mitigation Measures." This finding is based on an analysis of the types of construction activities and their intensity, the location of sensitive receptors that could be affected by the proposed project's construction, and the overall construction duration.

With the St. George Retail Development Only Alternative, it is assumed that the North Site parking lot could be utilized to accommodate additional temporary parking during construction thereby potentially minimizing the need to obtain off-site parking facilities during the construction period. The North Site may also offer additional construction staging areas thereby simplifying construction sequencing and management on the South Site. Since the North and South Sites are connected along Bank Street and utilize common points of access and egress, such an internal distribution of staging areas would not be disruptive to the surrounding street network.

#### *NEIGHBORHOOD CHARACTER*

Like the proposed project, the St. George Retail Development Only Alternative is expected to result in a positive effect on the neighborhood character in the study area. The proposed project would enhance the area as an attractive gateway to Staten Island. With the St. George Retail Development Only Alternative, this would only benefit the South Site since the North Site would remain a surface parking lot separating Richmond Terrace from the waterfront. In addition, while this alternative would result in a net increase of 0.09 ~~0.14~~ acres of passive open space on the South Site, it would not result in the creation of ~~4.94~~ 7.88 acres of new active and passive open space on the North Site that would be introduced with the proposed project.

### **D. WHEEL ONLY ALTERNATIVE**

#### **DESCRIPTION**

The Wheel Only Alternative would be consistent with the proposed project including development of the North Site with the Observation Wheel, Wheel Terminal Building, and parking structure with a green roof and passive and active open space. With the Wheel Only Alternative, there could still be the potential addition of a waterborne transit landing. The Wheel Only Alternative would not include the retail outlet center, hotel, or catering facility included in the proposed project.

The Wheel, Wheel Terminal Building, and passive and active open space under the Wheel Only Alternative would be the same as envisioned under the proposed project—a 625-foot-tall Observation Wheel, a ~~120,000~~ 95,100 gsf Wheel Terminal Building, and 7.88 ~~4.94~~ acres of publicly accessible active and passive open space. Similar to under the proposed project, the Wheel Only Alternative would also deck over (but not eliminate) the RROW located adjacent to the proposed North Site parcel. The Wheel Terminal Building in the Wheel Only Alternative would be the same as proposed under the proposed project, housing ~~40,000~~ 47,300 gsf of

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commercial space, ~~18,500~~ 25,000 gsf of retail space, an ~~7,600~~ 11,000 gsf restaurant<sup>1</sup>, ~~5,900~~ 17,000 gsf of exhibition or wheel hall space, ~~4,200~~ 4,000 gsf of theater space, as well as ~~11,600~~ 23,000 gsf of back of house and mechanical space.

Parking for the Wheel Only Alternative would either be provided exclusively on the North Site, in a ~~four~~ three-level public parking structure as envisioned under the proposed project, or partially in structured parking on the North Site with the remainder provided in structured parking on the South Site.

Like the proposed project, under the Wheel Only Alternative, Bank Street would be widened from a 24-foot to a 30-foot roadway. The widened Bank Street would include a bike lane from Jersey Street to the easternmost boundary of the North Site.

Aside from any potential expanded parking area, the South Site in the Wheel Only Alternative would remain in its current condition. With the Wheel Only Alternative, there could still be the potential addition of a waterborne transit landing which would be located at the end of the Wall Street Ramp as described in Chapter 1, "Project Description."

### WHEEL ONLY ALTERNATIVE COMPARED WITH THE PROPOSED PROJECT

The following sections compare conditions under the Wheel Only Alternative with conditions with the proposed project.

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

Like the proposed project, the Wheel Only Alternative would not result in any significant adverse impacts to land use, zoning, or public policy. The potential addition of the waterborne transit landing would also not result in significant adverse impacts.

Like the proposed project, the Wheel Only Alternative would activate and enliven the waterfront with the Observation Wheel, Wheel Terminal Building, new open space, and new connections between the waterfront and Richmond Terrace. However, under the Wheel Only Alternative, the South Site would remain a surface parking lot, or possibly an expanded parking structure to accommodate a portion of the existing and project-generated parking demand. The Wheel Only Alternative would enhance upland connections on the North Site; however, it would not redevelop the same expanse of prime waterfront property as under the proposed project. While the Wheel Only Alternative would introduce ~~7.88~~ 4.94 acres of active and passive open space on the North Site, it would not result in the net increase of ~~0.09~~ 0.14 acres of passive open space on the South Site. As a result, this alternative would not support local planning goals to the same degree as the proposed project, including redevelopment of St. George, reuse of former industrial space, and promotion of public access to and enjoyment of the waterfront, as described in DCP's *Vision 2020: New York City Comprehensive Waterfront Plan* or DCP's *North Sore 2030* plan.

Compared with the proposed project, the Wheel Only Alternative would not require a refinement of the bus terminus at St. George should the BRT alternative in ~~MTA's~~ NYCT's NSAA move forward. However, as stated in Chapter 2, "Land Use, Zoning, and Public Policy," ~~there are no funding sources or anticipated implementation efforts pending for the BRT alternative.~~ NYCT is

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<sup>1</sup> The transportation analysis conservatively considers the effects of a 15,000 sf restaurant, which includes the ~~7,600~~ 11,000 sf of indoor restaurant space described in Chapter 1, "Project Description," as well as outdoor seating associated with the restaurant.

currently conducting additional design work to identify alternative designs for BRT terminal operations at St. George.

#### *SOCIOECONOMIC CONDITIONS*

The Wheel Only Alternative (with or without the potential waterborne transit landing), like the proposed project, would not result in significant adverse impacts to socioeconomic conditions. The Wheel Only Alternative would not result in any direct or indirect residential displacement, or adverse effects on specific industries. Neither the proposed project nor the Wheel Only Alternative would lead to significant adverse impacts due to indirect business displacement from increased rents, and both alternatives would have the potential to spur decreases in retail vacancy rates and broader retail offering within the study area.

Compared with the proposed project, the Wheel Only Alternative would have less potential to result in indirect business displacement due to retail competition since the St. George Retail Development component of the proposed project represents nearly all the new retail associated with the development program. However, as noted in Chapter 3, “Socioeconomic Conditions,” a detailed assessment of retail competition has determined that the proposed project would not result in a significant adverse impact. Either alternative has the potential to generate increased retail traffic that could benefit existing retail businesses in the Staten Island Primary Trade Area. However, it is noted that without the St. George Retail Development project, daily visitation to the project sites under the Wheel Only Alternative would likely be less than anticipated under the proposed project, and any benefit from increased retail traffic in the study area may be less pronounced.

#### *COMMUNITY FACILITIES*

As with the proposed project, the Wheel Only Alternative (with or without the potential waterborne transit landing) would not directly affect any community facility, nor would it contain a residential component that would place additional demands on the service delivery of any community facility.

#### *OPEN SPACE*

It is anticipated that the Wheel Only Alternative (with or without the potential waterborne transit landing) would provide an additional ~~7.88~~ 4.94 acres of publicly accessible active and passive open space; however, the net increase of ~~0.09~~ 0.14 acres of passive open space would not be introduced on the South Site with this alternative. Compared with the proposed project, the Wheel Only Alternative would generate less demand for open space resources from new workers. Therefore, the net positive increase in open space ratios as presented in Chapter 5, “Open Space,” would be greater under the Wheel Only Alternative. In either case, passive open space ratios would exceed DCP’s planning goals, and neither the proposed project nor the Wheel Only Alternative would result in any significant adverse direct impacts to open space related to shadows, air quality, noise, or odors.

#### *SHADOWS*

The Wheel Only Alternative, like the proposed project, would not generate significant adverse impacts from shadows on adjacent sun sensitive resources. This alternative includes the 625-foot-tall Observation Wheel which has the potential to extend shadows well beyond the project site. However, that structure has been determined to not create an adverse shadow impact

primarily based on the open framework of the structure and the limited area it would potentially cast shadows. The addition of potential waterborne transit landing with the Wheel Only Alternative would similarly not generate significant adverse impacts on sun sensitive resources.

### *HISTORIC RESOURCES*

#### *Archaeological Resources*

The Wheel Only Alternative (with or without the potential waterborne transit service) would result in ground disturbance on the North Site only compared with the proposed project, which anticipates disturbance across both the North and South Sites. If a new parking structure on the South Site were contemplated, then the likelihood of ground disturbance on both sites would be similar to the proposed project. However, since LPC has determined that neither project site is sensitive for archaeological resources, neither the Wheel Only Alternative nor the proposed project would adversely affect archaeological resources.

#### *Architectural Resources*

As there are no known or potential architectural resources located on either the North Site or South Sites, neither the Wheel Only Alternative nor the proposed project would have any direct or indirect impacts to on-site architectural resources.

The Observation Wheel would be the most prominent visual element of the Wheel Only Alternative and of the proposed project. Along with the Observation Wheel, the height of the parking structure on the North Site may also affect views to and from architectural resources along Richmond Terrace. However the Wheel Only Alternative, like the proposed project, would not be anticipated to significantly alter the visual prominence of architectural resources in this portion of the study area. Views to the resources on Richmond Terrace from certain portions of Bank Street and the waterfront esplanade could potentially be obscured by the proposed development in both the Wheel Only Alternative and the proposed project; however, any development of these sites would be anticipated to limit such views compared with existing conditions. In their present condition as surface parking lots, the North and South Sites do not contribute to or enhance the setting of the resources in these views. In no case would views of the resources from these locations be fully obstructed.

As described in Chapter 7, “Historic and Cultural Resources,” the Observation Wheel would be a unique but not incompatible visual element within the setting of the study area’s known and potential architectural resources. In both the Wheel Only Alternative and the proposed project, the anticipated changes to the settings and views of the study area’s architectural resources would not adversely affect the characteristics for which the historic properties meet or may meet S/NR and NYCL criteria. Therefore, neither the Wheel Only Alternative nor the proposed project would have a significant adverse impact on architectural resources.

### *URBAN DESIGN AND VISUAL RESOURCES*

The Wheel Only Alternative would be more active and would enhance the pedestrian experience of the North Site compared with the existing condition, but such improvements would be more limited than under the proposed project, since the alternative would develop only the North Site, leaving the South Site as a surface parking lot (or an expanded parking structure). Similarly, the Wheel Only Alternative would provide enhanced connections to upland areas only on the North

Site, while the proposed project would improve upland connections across both the North and South Sites.

The Wheel Only Alternative is anticipated to be visible in views within or from just outside of the study area beyond the immediate Richmond Terrace frontage. Under both the proposed project and the Wheel Only Alternative, the Observation Wheel would continue to be visible from longer views toward the project sites from across New York Harbor. Both the proposed project and the Wheel Only Alternative are intended to provide the surrounding area with an enhanced sense of place as an attractive gateway to Staten Island, and to provide momentum for further development on nearby sites. Overall, neither the proposed project nor the Wheel Only Alternative would result in a significant adverse impact to urban design or visual resources.

With the Wheel Only Alternative, it is also possible that there could be a shift of some of the commuter parking that is proposed on the North Site by building a new parking structure on the South Site that would accommodate all the existing South Site parking and a portion of the North Site spaces. This would permit a smaller and less complex parking structure to be built on the North Site, although it is still assumed that the Wheel Only Alternative would have a parking structure with its green roof and would provide 7.88 ~~4.94~~ acres of publicly accessible active and passive open space. For an urban design and visual character perspective, this could result in an overall lower height of the parking structure thereby minimizing the grade change from Richmond Terrace onto the new structure. The addition of a parking structure on the South Site would not likely be tall enough to rise above the grade of Richmond Terrace.

The lighting program on the North Site that would be introduced with the proposed project would be introduced with this alternative; however, no lighting would be introduced on the South Site. As described in Chapter 8, “Urban Design and Visual Resources,” the lighting program that would be introduced by the proposed project on the North Site would be designed and managed to avoid new lighting on the land side portion thereby minimizing night lighting effects on the inland community. Therefore, like the proposed project, the Wheel Only Alternative would not have a significant adverse impact on urban design and visual resources.

#### *NATURAL RESOURCES*

As described in Chapter 9, “Natural Resources,” the condition of water quality, aquatic biota, wetlands, floodplains, groundwater, and terrestrial natural resources within and near the project sites would remain generally unchanged after completion of the proposed project. The Wheel Only Alternative would continue to provide a green roof and open space atop the Wheel Terminal Building and parking structure and, like the proposed project, would result in a net increase in vegetation cover which would potentially benefit some wildlife such as insects and songbirds. Overall, neither the Wheel Only Alternative nor the proposed project would have significant adverse impacts to natural resources or floodplains in the area, and with the implementation of stormwater management measures, the increase in impervious surface would not adversely affect water quality, aquatic biota, or NYSDEC littoral zone tidal wetlands of the Upper New York Harbor within the vicinity of the project site both may slightly improve water quality by increasing pervious surface coverage and improving stormwater capture. As discussed for the proposed project, authorization under Article 25 of the ECL would be required from NYSDEC for the Wheel Only Alternative for development within the NYSDEC tidal wetlands adjacent area. The Wheel Only Alternative would still require, as noted in Chapter 9, “Natural Resources,” the implementation of a best practices management and monitoring program for

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night lighting in order to minimize the potential for adverse impacts with night lighting of the Observation Wheel.

### *HAZARDOUS MATERIALS*

Like the proposed project, the Wheel Only Alternative would require ground disturbance on portions of the VCA Site, which encompasses the North Site, ~~and the northern half of the South Site, and the southern half of the Bank Street Expansion (south of St. Peter's Place)~~ and is currently subject to NYSDEC approval of procedures for redevelopment of the VCA Site. If parking were expanded on the South Site and additional disturbance beyond the VCA site were required, the Wheel Only Alternative would require development of a RAP and CHASP similar to those that would be developed for the proposed project. With such measures in place, neither the Wheel Only Alternative nor the proposed project would result in significant adverse impacts related to hazardous materials.

### *WATER AND SEWER INFRASTRUCTURE*

Increases in demand for water supply and sanitary sewage generation would be considerably less with the Wheel Only Alternative compared with the proposed project. Of the approximately ~~151,564~~ ~~155,400~~ gpd of domestic water use and sewage generation expected with the proposed project, only about ~~13,164~~ ~~17,000~~ gpd would be generated by the proposed development on the North Site. However, these increases would be minimal under both the Wheel Only Alternative and the proposed project and would not significantly impact existing city infrastructure.

Like the proposed project, the Wheel Only Alternative would implement Best Management Practices such as green roofs, sand filters, and permeable pavement. As a result, while the stormwater collection and outfall system may require reconstruction as part of the Wheel Only Alternative, like the proposed project, stormwater runoff discharge would not result in any significant adverse impacts.

The potential waterborne transit service would not generate additional water or sewage demand and has no incremental effect on either the proposed project or the Wheel Only Alternative.

### *SOLID WASTE AND SANITATION SERVICES*

The Wheel Only Alternative would generate considerably less solid waste than the proposed project (approximately 42,600 pounds per week for the Wheel Only Alternative compared with approximately 174,000 pounds per week for the proposed project). Neither the proposed project nor the Wheel Only Alternative would result in significant adverse impacts on solid waste and sanitation services.

### *ENERGY*

The increase in demand for electricity would be less with the Wheel Only Alternative compared with the proposed project. However, the increase in electricity demand generated by either scenario would be insignificant relative to the capacity of these systems and the current levels of service in the Con Edison service area, and neither the Wheel Only Alternative nor the proposed project would result in significant adverse impacts with respect to the transmission or generation of energy. In addition, like the proposed project, the Wheel Only Alternative would result in the development of renewable energy generation systems, including solar panels and wind turbines.

TRANSPORTATION

Under the Wheel Only Alternative, the land uses on the North Site, including the Observation Wheel, Wheel Terminal Building, and passive and active open space, along with the same number of parking spaces (950 cars and 12 buses), would be developed to the same scale as under the proposed project. The Wheel Only Alternative would not include the retail outlet center, hotel, or catering facility included on the South Site in the proposed project.

As a result, the traffic, pedestrian, and transit trips and parking demand generated by this alternative would be less than the trip generation estimates shown in Tables 14-42, 36 and 14-43, 37-(see Chapter 14, “Transportation”).

Traffic

The Wheel Only Alternative would generate 82, 81, 88, and 82 percent fewer vehicle trips than the proposed project in the Weekday MD, Weekday PM, Saturday MD, and Saturday PM peak hours, respectively. **Table 21-3** compares the vehicular trip generation from the proposed project and the Wheel Only Alternative.

**Table 21-3**  
**Comparison of Vehicle Trips Generated by the Wheel Only Alternative and the Proposed Project**

Peak Hour	Proposed Project			Wheel Only Alternative			Net Difference		
	In	Out	Total	In	Out	Total	In	Out	Total
Weekday Midday	534	544	1078	96	96	192	-438	-448	-886
Weekday PM	548	521	1069	103	103	206	-445	-418	-863
Saturday Midday	711	864	1575	96	96	191	-616	-768	-1384
Saturday PM	578	702	1281	115	116	231	-463	-587	-1049

Note: In plus Out trips may not equal Total trips due to rounding.

Peak Hour	Proposed Project			Wheel-Only Alternative			Net-Difference		
	In	Out	Total	In	Out	Total	In	Out	Total
Weekday Midday	534	543	1077	96	96	192	-438	-448	-886
Weekday PM	548	520	1068	103	103	205	-445	-418	-863
Saturday Midday	711	863	1574	95	95	190	-616	-768	-1384
Saturday PM	578	702	1279	115	115	230	-463	-587	-1049

The Wheel Only Alternative would result in significant adverse traffic impacts. However, because the trips generated by the retail, hotel, and catering facility land uses proposed on the South Site as part of the proposed project would no longer be generated, the Wheel-Only Alternative would result in fewer impacted locations than the proposed project during each of the peak hours studied, and all of the impacts could be fully mitigated.

The number of impacted intersections during each peak hour is summarized below:

- Weekday MD: 5 6 impacted locations compared with 13 impacted locations for the proposed project.

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- Weekday PM: ~~8-6~~ impacted locations compared with 14 impacted locations for the proposed project.
- Saturday MD: ~~4-3~~ impacted location compared with 13 impacted locations for the proposed project.
- Saturday PM: ~~6-5~~ impacted locations compared with 15 impacted locations for the proposed project.

Furthermore, it is likely that the measures required to mitigate the impacted locations under this alternative would be of a lesser magnitude than for the proposed project. For example, fewer seconds of green time would need to be reallocated at an impacted intersection under the Wheel Only Alternative than would be required for the proposed project at the same impacted intersection. If this alternative is selected versus the proposed project, the developer would be required to identify specific mitigation.

As the trips generated by the retail, hotel, and catering facility land uses proposed on the South Site as part of the proposed project would no longer be generated, the Wheel Only Alternative ~~would not result in a significant and unavoidable impact at the intersection of Richmond Terrace and Hamilton Avenue. However, the Wheel Only Alternative would continue to result in significant and unavoidable adverse traffic impacts at the intersections on Richmond Terrace at the Ferry Viaduct (cars) and the Ferry Viaduct (buses).~~ would result in a significant and unavoidable impact at Richmond Terrace at the Ferry Viaduct (buses), but this impact would be limited to the Weekday MD period only. The Wheel Only Alternative would also result in the partially mitigated significant and unavoidable impact at the Richmond Terrace at the Ferry Viaduct (cars) for all peak hours.

### *Parking*

Like the proposed project, the Wheel Only Alternative would provide for a parking structure on the North Site, and the South Site would continue to be a surface parking lot or would be developed into structured parking. A total of 950 parking spaces for cars and 12 parking spaces for buses would be provided, while maintaining the current number of parking spaces that exist on the South Site. The total existing commuter parking supply would be provided between the two sites, in addition to the parking supply for the North Site, for a total of 1,760 parking spaces. The total number of parking spaces that would be introduced with the Wheel Only Alternative would be less than the parking supply that would be generated by the proposed project (2,191 ~~2,200~~ total spaces). The peak parking accumulation is as follows:

- Weekday (No Staten Island Yankees game): 1,599 ~~1,641~~ parking spaces at 2:00 PM
- Weekday (With Staten Island Yankees game): 1,647 ~~1,689~~ parking spaces at 2:00 PM
- Saturday (No Staten Island Yankees game): 727 ~~724~~ parking spaces at 4:00 PM
- Saturday (With Staten Island Yankees game): 1,519 ~~1,516~~ parking spaces at 6:00 PM

As the peak parking demand does not exceed the total supply of 1,760 parking spaces, the Wheel Only Alternative would not result in a shortfall of parking or any significant adverse parking impacts.

### *Transit*

The Wheel Only Alternative would generate 31, 34, 34, and 35 percent fewer Staten Island Ferry trips than proposed project in the Weekday MD, Weekday PM, Saturday MD, and Saturday PM

peak hours, respectively. **Table 21-4** compares the Staten Island Ferry trip generation from the proposed project and the Wheel Only Alternative.

**Table 21-4**  
**Comparison of Staten Island Ferry Trips Generated by the  
Wheel Only Alternative and the Proposed Project**

Peak Hour	Proposed Project			Wheel Only Alternative			Net Difference		
	In	Out	Total	In	Out	Total	In	Out	Total
<b>Weekday Midday</b>	1285	1220	2505	866	866	1732	-420	-354	-774
<b>Weekday PM</b>	1334	1312	2647	872	872	1743	-463	-441	-903
<b>Saturday Midday</b>	1388	1409	2797	923	923	1845	-466	-487	-952
<b>Saturday PM</b>	1067	1484	2551	828	828	1656	-239	-656	-894

Note: In plus Out trips may not equal Total trips due to rounding.

The Wheel Only Alternative could result in significant adverse transit impacts on the Staten Island Ferry. Although the Ferry trips generated by the retail, hotel, and catering facility land uses proposed on the South Site as part of the proposed project would no longer be generated, the Wheel Only Alternative could still result in significant adverse transit impacts on the Staten Island Ferry during all four peak hours. The impacts noted are a function of the throughput capacity as determined by NYCDOT, which is limited by the width of the boarding aprons and the ability to process passengers during the 6.5-minute time window currently allotted in the printed schedules. At all times, and specifically during each of the above single landing cycles, the ferries and ferry terminals themselves would have sufficient licensed capacity to accommodate the projected ridership. ~~The Wheel Only Alternative would not result in any other significant adverse transit impacts.~~

The Wheel Only Alternative would result in a significant adverse transit impact on the northern platform stairs to/from the downtown R platform at the Whitehall Station during the Weekday PM peak hour. However, compared with the proposed project, the required widening is based on a WIT of 4.59 inches, a difference of 2.37 inches.

#### *Pedestrians*

Because the Wheel Only Alternative would not include any development on the South Site that would generate new pedestrian trips, it would generate fewer pedestrian trips than the proposed project. As no pedestrian impacts would be expected with the proposed project, the Wheel Only Alternative would likewise not result in significant adverse pedestrian impacts.

#### *AIR QUALITY*

The Wheel Only Alternative would generate considerably fewer vehicle trips to and from the project sites than the proposed project and would result in proportionally less mobile source air quality pollutants. Similarly, the alternative would generate less overall stationary source emissions since there would be no new structures on the South Site requiring heating or ventilation. Therefore, the Wheel Only Alternative, like the proposed project, would not generate significant adverse impacts on air quality. Since the potential waterborne transit service was found not to result in significant adverse impacts with the proposed project, it would similarly not generate impacts in the Wheel Only Alternative.

*GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE*

The Wheel Only Alternative would result in ~~4,834~~ 4,553 metric tons of CO<sub>2</sub>e per year, far less annual GHG emissions of metric tons compared with the proposed project (estimated at ~~20,067~~ 19,807 metric tons of CO<sub>2</sub>e). With the Wheel Only Alternative, less building energy would be needed and fewer trips would be generated than with the proposed project. The Wheel Only Alternative, as with the proposed project, would strive to obtain the LEED Platinum certification. Specific sustainable measures would be incorporated into the design and construction of the proposed project to qualify for LEED rating, which would decrease the potential GHG emissions. The proposed project's design would include features to improve resiliency to climate change, including sea level rise. Based on the sustainable measures that would be included, the proposed project would be consistent with the City's emissions reduction goal, as defined in the *CEQR Technical Manual*.

*NOISE*

Compared with the proposed project, the Wheel Only Alternative (with or without the potential waterborne transit landing) would result in a proportionate reduction of new traffic-generated or on-site sources of noise. Like the proposed project, the alternative would not result in significant adverse impacts on any closest sensitive receptor locations.

In terms of CEQR Noise Exposure Guidelines, both the Wheel Only Alternative and the proposed project have noise levels at receptor sites 1, 2, and 3 that would remain in the "marginally unacceptable" category while noise levels would remain above the 55 dBA L<sub>10(1)</sub> noise level guideline for outdoor areas requiring serenity and quiet provided in the *CEQR Technical Manual* noise exposure guidelines) at receptor Site 4, and noise levels would remain in the "marginally acceptable" category at Site 5.

As with the proposed project, development of the Wheel Only Alternative would continue to require noise attenuation of 28 dBA along the western façade of the Wheel Terminal Building.

*PUBLIC HEALTH*

Like the proposed project, the Wheel Only Alternative would not result in significant adverse impacts on public health.

*CONSTRUCTION*

Construction activities, phasing, and overall timeframe for the Wheel Only Alternative would be essentially the same as described in detail for the North Site in Chapter 20, "Construction." As a result, the alternative would continue to result in localized and temporary disruptions due to construction activity, ~~but, like~~. Similar to the proposed project, it is not expected to that the construction activities associated with the Wheel Only Alternative would result in any significant adverse impacts due to construction activities with respect to vehicular traffic at the intersection of Richmond Terrace and Jersey Street after the end of the second quarter of 2015, but this impact would be limited to the Weekday PM period only. This impact can be mitigated by advancing the proposed mitigation for the With-Action condition at this location, as described in Chapter 22, "Mitigation Measures." This finding is based on an analysis of the types of construction activities and their intensity, the location of sensitive receptors that could be affected by the proposed project's construction, and the overall construction duration.

With the Wheel Only Alternative, it is possible that there could be shift of some of the commuter parking that now is to be replaced on the North Site by building a new parking structure on the South Site that would accommodate all of the existing South Site parking and a portion of the North Site spaces. This could permit a smaller and less complex parking structure on the North Site and therefore less intense construction activities, although it is still assumed that the Wheel Only Alternative would have a parking structure with its green roof providing active and passive open space.

Like the proposed project, temporary parking during construction of the Wheel Only Alternative could be accommodated on-site. However, unlike the proposed project, it is also possible that the South Site parking lot could be utilized to accommodate some temporary parking during construction. Therefore, additional areas at the North Site could be available for construction staging thereby simplifying construction sequencing and management on the North Site.

#### *NEIGHBORHOOD CHARACTER*

Like the proposed project, the Wheel Only Alternative (with or without the potential waterborne transit service) is expected to result in a positive effect on the neighborhood character in the study area. The proposed project would enhance the area as an attractive gateway to Staten Island and, like the proposed project, would continue to provide ~~7.88~~ 4.94 acres of publicly accessible active and passive open space further linking the St. George community with the waterfront. However, with the Wheel Only Alternative, the South Site would remain a surface parking lot (or possibly an expanded parking structure) separating Richmond Terrace from the waterfront.

### **E. NO UNMITIGATED TRAFFIC AND SUBWAY IMPACTS ALTERNATIVE**

The proposed project would result in a significant and unavoidable traffic impacts with respect to traffic at one three intersections (Richmond Terrace and the Ferry Viaduct (cars), (Richmond Terrace and the Ferry Viaduct (buses)) and a partially mitigated significant and unavoidable traffic impact with respect to traffic at one intersection (Richmond Terrace and the Ferry Viaduct (cars)). The proposed project would also result in a significant and unavoidable subway impact on the northern platform stairs to/from the downtown R platform at the Whitehall Station and ~~and Richmond Terrace and Hamilton Avenue~~ and could potentially result in significant and unavoidable transit impacts on the Staten Island Ferry. Since the ferry is projected to potentially be over functional capacity in 2016 independent of the proposed project, alternatives to the proposed project were explored that would allow for the mitigation of all traffic (vehicular) and subway impacts only.

To eliminate all unmitigatable traffic and subway impacts, the proposed project would have to be reduced to either of the following development programs:

- Eliminate the entire North Site project (Observation Wheel, open space, etc.) and the entire South Site with the exception of the 200-room hotel. ~~reduce the South Site retail size from 340,000 gsf to approximately 15,000 gsf.~~
- Eliminate the entire South Site project (retail outlet center, hotel, catering facility, etc.), and eliminate the Observation Wheel restaurant from the North Site, and reduce the restaurant from 15,000 gsf to approximately 7,500 gsf.

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Either of these development scenarios would result in a project of limited viability and would not achieve the City's goal to provide a comprehensive mixed-use development on both the North and South Sites. Neither alternative development scenario would redevelop the same expanse of prime waterfront property as under the proposed project. In addition, compared with the proposed project, the alternative development scenarios would only provide additional upland connections to Richmond Terrace and the St. George neighborhood on either the North Site or South Site. Therefore, these alternatives are not considered feasible, and no further analysis is warranted. \*