

Willets Point Development Project

CEQR Number 07DME014Q

STATEMENT OF FINDINGS

**Made Pursuant to the New York State Environmental Quality Review Act and
City Environmental Quality Review**

Office of the Deputy Mayor for Economic Development

December 2013

INTRODUCTION AND SUMMARY OF PROJECT

Introduction

This Statement of Findings is issued pursuant to Article 8 of the New York State Environmental Conservation Law (the State Environmental Quality Review Act or SEQRA), 6 NYCRR Part 617, and New York City Mayoral Executive Order 91 of 1977, as amended, and the Rules of Procedure for City Environmental Quality Review, found at Title 62, Chapter 5 of the Rules of the City of New York (CEQR). This Statement of Findings has been prepared to (i) certify that procedural requirements have been met; (ii) consider the relevant environmental impacts, facts, and conclusions disclosed in the final EIS; (iii) weigh and balance the relevant environmental impacts of the proposed action with social, economic, and other considerations; and (iv) provide a rationale for the decision of the Office of the Deputy Mayor for Economic Development, in the Office of the Mayor.

This statement sets forth the findings of the Office of the Deputy Mayor for Economic Development, in the Office of the Mayor, as lead agency with respect to the environmental impacts of the Willets Point Development Project as analyzed in the Final Environmental Impact Statement (FEIS) approved by the lead agency on August 9, 2013.

Lead Agency

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SEQRA Status

The Willets Point Development Project is classified as a Type I action pursuant to 6 NYCRR Part 617.4(b)(5)(v) and Part 617.4(b)(6).

Location and Description of the Proposed Project

The project site is composed of three discrete areas roughly bounded by Shea Road and Northern Boulevard to the north, the Van Wyck Expressway to the east, Roosevelt Avenue and the Metropolitan Transportation Authority (MTA) Corona Rail Yard to the south, and Shea Road to the west in Queens. The “Willets Point” portion of the project site is the Special Willets Point District, east of the CitiField stadium; the “Willets West” portion of the project site is an approximately 30.7-acre section of the surface parking field west of CitiField; and the “Roosevelt Avenue” portions of the project site comprise three CitiField-related surface parking lots (South Lot and Lots B and D) along Roosevelt Avenue south and southwest of CitiField.

The proposed project would redevelop the Willets Point/CitiField area with a mix of uses that is expected to be completed by 2032. The redevelopment would incorporate a development in the Special Willets Point District substantially as anticipated and analyzed in the 2008 FGEIS and subsequent technical memoranda, as well as a major entertainment/retail component and parking adjacent to CitiField. See Table 1 below.

Table 1
Summary of Proposed Program, by Phase

Use (sf)	Project Area	Phase 1A	Phase 1B	Phase 2	Totals by Use
Retail	SWPD	30,000	875,000	345,000	1,250,000
	WW	1,400,000 ¹			1,400,000
Hotel	SWPD	160,000 [200 rooms]	235,000 [290 rooms]	165,000 [210 rooms]	560,000 [700 rooms]
Residential	SWPD		2,490,000 [2,490 units]	3,360,000 [3,360 units]	5,850,000 [5,850 units]
School	SWPD		105,000	125,000	230,000
Community Facility	SWPD		25,000	125,000	150,000
Office	SWPD		500,000		500,000
Convention Center	SWPD			400,000	400,000
Open Space	SWPD	TBD	6 acres	5 acres	8 acres ²
Total		1,590,000 gsf	4,230,000 gsf 6 acres	4,520,000 gsf 5 acres	10,340,000 gsf 8 acres
Notes: SWPD = Special Willets Point District WW = Willets West ¹ Anticipated to include cinema use and approximately 400,000 sf of common area and back of house space. ² Some of the open spaces developed in Phase 1B would be replaced or expanded with new open space in Phase 2. The cumulative total of open space to be developed within the District is 8 acres.					

The proposed project required multiple City and State approvals, including:

- Zoning text amendment to Zoning Resolution (ZR) Section 124-60 to allow use modifications as part of a phased development within the Special Willets Point District;
- Special permit pursuant to ZR Section 124-60 to allow surface parking/open and enclosed privately operated recreation uses for Phase 1A within the Special Willets Point District;
- Modification of the existing lease for the CitiField property and adjacent parking properties;
- Mayoral and Queens Borough Board approval of the business terms pursuant to New York City Charter Section 384(b)(4);
- Approval by the New York City Industrial Development Agency (IDA) or other government agencies for the waiver of mortgage recording tax for property within the Special Willets Point District; and
- A minor modification of the previously approved changes to the City Map to modify the staging for the closure of City Streets. This modification would not result in the demapping of any additional City streets beyond those previously approved for demapping.

In addition to the discretionary approvals listed above, Public Design Commission approval also is required for the Willets West development. In addition to the above approvals, confirmation that all proposed buildings fall within the maximum Federal Aviation Administration (FAA) height limitations would be sought from the FAA; however, no approval or permit to exceed such permitted heights is anticipated to be sought.

PROCEDURAL HISTORY

The Office of the Deputy Mayor for Economic Development (ODMED) issued its Notice of Intent to serve as lead agency on August 20, 2013 to the Department of City Planning (DCP) and the Department of Parks and Recreation (DPR). The Office of the Deputy Mayor for Economic Development assumed

lead agency status and issued an Environmental Assessment Statement (EAS) on August 28, 2012. Based on information contained in the EAS, ODMED determined that the proposed project could have the potential to result in significant adverse environmental impacts and issued a Positive Declaration and Notice of Intent to Prepare a Draft Supplemental Environmental Impact Statement (DSEIS) on August 28, 2012, along with a draft Scope of Work for the SEIS. The EAS, Positive Declaration, and draft Scope of Work for an EIS were posted on the websites of the Mayor's Office of Environmental Coordination and the New York City Economic Development Corporation (EDC). The draft Scope of Work and Notice of Public Scoping were published in the *City Record* from August 27, 2012 through August 30, 2012; the *Environmental Notice Bulletin* on August 29, 2012; *El Diario* and the *New York Post* on August 27 and 29, 2012; and the *Queens Ledger* on August 30, 2012.

A public scoping meeting was held for the proposed project on September 27, 2012 at the P.S. 19 Marino Jeantet, 98-02 Roosevelt Avenue, Queens, New York. Written comments were accepted through October 26, 2012, and a final Scope of Work was issued on March 11, 2013.

The draft SEIS (DSEIS) was then prepared in accordance with the final Scope of Work. On March 15, 2013, ODMED accepted the DSEIS and issued a Notice of Completion. The DSEIS accompanied the proposed project's Uniform Land Use Review Procedure (ULURP) applications through the ULURP process. In conjunction with the public hearing on the proposed project's ULURP applications, a public hearing on the DSEIS was held on July 10, 2013. The ULURP and DSEIS hearings were noticed in the *City Record* from June 25, 2013 through July 10, 2013. Comments on the DSEIS were accepted through July 22, 2013.

On August 9, 2013, ODMED issued the Notice of Completion for the Final Supplemental Environmental Impact Statement (FSEIS) for the proposed project. The FSEIS incorporates revisions to the DSEIS that were made subsequent to the issuance of the DSEIS. The revisions reflect: the Federal Emergency Management Agency's new Best Available Flood Hazard Data and new projections on sea level rise from the New York City Panel on Climate Change; the Phase II Subsurface Investigation Work Plan and Health and Safety Plan for the Willets West portion of the project site that were approved by the New York City Department of Environmental Protection in July 2013; the commitment in the DSEIS to analyze three additional traffic and pedestrian analysis locations, as well as the analysis of another subway line; the results of the refined mobile source analysis conducted for PM_{2.5} between the DSEIS and FSEIS in consultation with the New York City Department of Environmental Protection; refinement of mitigation measures, and a summary of and responses to public comments.

In addition to the agencies DCP and DPR mentioned above, ODMED consulted with a number of other City agencies during the environmental review process. These included the New York City Landmarks Preservation Commission (LPC), the New York City Department of Environmental Protection (DEP), the New York City Department of Transportation (DOT), DPR, the New York City Department of Sanitation (DSNY), and the New York City Law Department (Law). These agencies provided particular assistance to ODMED in the review of those matters within the agency's area of expertise.

Having reviewed the DSEIS, FSEIS and supporting and related documents, ODMED makes the findings and conclusions contained herein based on those documents and the administrative record.

FACTS AND CONCLUSIONS RELIED UPON TO SUPPORT THE DECISION

The FSEIS analyzed the proposed project in detail and concluded that the proposed project would not result in significant adverse impacts in the following areas during operation of the project: land use, zoning, and public policy; socioeconomic conditions; open space; shadows; archaeological resources; urban design and visual resources; natural resources; hazardous materials; water and sewer infrastructure;

solid waste; energy; air quality; greenhouse gas emissions; noise; public health; or neighborhood character. As discussed below, areas where potential significant impacts were identified include community facilities, historic resources, transportation and construction.

POTENTIAL SIGNIFICANT ADVERSE IMPACTS

Several potential significant adverse environmental impacts were identified in the FSEIS if the project were undertaken without mitigation. Certain measures have been identified that will either mitigate or partially mitigate these impacts. This section discusses those measures and describes their effectiveness in minimizing or avoiding the impacts they would address.

COMMUNITY FACILITIES

The FSEIS analysis of potential indirect effects on library services found that in Phase 2 of the project, the catchment area population increase for both the Flushing Library and Corona Library would exceed five percent, which may represent a significant adverse impact on library services according to the *CEQR Technical Manual*. While many of the residents in the catchment areas also reside within the catchment areas for other nearby libraries and would also be served by these libraries, and residents of the study area would have access to the entire Queens Library system through the inter-library loan system and would also have access to libraries near their places of work, ODMED, in consultation with the Queens Public Library, determined that the additional population introduced by the proposed project would impair the delivery of library services in the study area in 2032. To mitigate the impact on library services, adequate space¹ within the 125,000 square feet of as-yet-unprogrammed community facility space in the program for Phase 2 would be made available to be utilized as a branch library or auxiliary facility for the Queens Library system, or additional volumes or programs to accommodate new users could be provided if adequate space in nearby branches exists. Although no developer has yet been designated for Phase 2, the provision of additional library space in Phase 2 would be based on further consultation with Queens Public Library and ODMED.

The FSEIS analysis of indirect effects on child care facilities found that the proposed project may result in significant adverse impacts on publicly funded child care facilities in 2028. Therefore, to mitigate the potential impact on child care facilities that could occur by 2028, the Queens Development Group (i) would consult with the New York City Administration for Child Services (ACS) to determine the appropriate way to meet demand for child care services generated by the proposed project; and (ii) would, as directed by ACS, add capacity to existing facilities or provide a new child care facility within or near the area surrounding the project site. To mitigate the potential impact on child care facilities that could occur by 2032, EDC would require, as part of the developer's agreement, that the designated developer of Phase 2 consult with ACS to determine the appropriate way to meet demand for child care services generated by development in the District by 2032 and would, as directed by ACS, add capacity to existing facilities or provide a new child care facility within or near the area surrounding the project site.

Possible mitigation measures, which would be implemented by the developer(s) of Phase 1B and Phase 2, include adding capacity to existing facilities or providing a new child care facility within or near the area surrounding the project site. At this point, however, it is not possible to know exactly which type of mitigation would be most appropriate and when, because several factors may limit the number of children in need of publicly funded child care slots. Families in the study area could make use of alternatives to publicly funded child care facilities, such as homes licensed to provide family child care which families

¹ In other projects, 15,000–20,000 square feet of community facility space has been adequate for the operation of a branch library.

of eligible children could elect to use instead of a public child care center. In addition, parents of eligible children may use ACS vouchers to finance care at private child care centers either within the study area or could use facilities outside of study area.

HISTORIC AND CULTURAL RESOURCES

As detailed in the FSEIS, there are substantial challenges inherent in retaining the historic building located in the Special Willets Point District—the Former Empire Millwork Corporation Building—and the proposed project contemplates demolition of this building in Phase 2. A developer for Phase 2 has not yet been selected, and the Queens Development Group may or may not be selected as the designated developer for Phase 2. Before the development of Phase 2, the selected developer will consult with the New York State Office of Parks, Recreation and Historic Preservation (OPRHP) and LPC to evaluate any remaining potential alternatives to demolition. If none are identified, measures to mitigate this adverse impact would be developed in consultation with OPRHP and LPC. The mitigation measures could include recording the building through a Historic American Buildings Survey (HABS)-level photographic documentation and accompanying narrative.

TRANSPORTATION

Traffic

The proposed project is expected to be a significant traffic generator on both the highways surrounding the project site—including the Grand Central Parkway, the Van Wyck Expressway, and the Whitestone Expressway—and the local street network over the course of its three buildout phases. Future baseline (future No Action) volumes, to which the traffic generated by the proposed project and Lot B would be added, and future levels of service are expected to be significantly worse than existing conditions due to background traffic growth plus traffic generated from additional background development projects.

By Phase 1A, the proposed project is expected to have significant traffic impacts at 15 of the 32 intersections analyzed, both signalized and unsignalized, for the future With Action condition in the weekday AM peak hour, 16 of 32 in the weekday midday peak hour, and 20 of 32 in the weekday PM and Saturday midday non-game peak hour. On game days, 23 of 32 intersections analyzed would have significant traffic impacts during the PM pre-game weekday peak hour, 19 of 32 intersections analyzed would have significant traffic impacts during the Saturday pre-game peak hour and 21 of 32 intersections analyzed would have significant impacts during the Saturday post-game peak hour.

In Phase 1B, the proposed project is expected to have significant traffic impacts at 19 of the 33 intersections analyzed in the weekday AM peak hour, 21 of 33 in the weekday midday peak hour, 21 of 33 in the weekday PM peak hour, and 24 of 33 in the non-game-Saturday midday peak hour. On game days, 22 of 33 intersections analyzed would have significant traffic impacts during the PM pre-game weekday peak hour, 21 of 33 intersections analyzed would have significant traffic impacts during the Saturday pre-game peak hour and 23 of 33 intersections analyzed would have significant impacts during the Saturday post-game peak hour.

By full buildout in Phase 2, including the potential future development of Lot B, the proposed project is expected to have significant traffic impacts at 23 of the 34 intersections analyzed in the weekday AM peak hour, and 28 of 34 in the weekday midday peak hour, 29 of 34 in the weekday PM peak hour, and 27 of 34 in the Saturday midday non-game peak hours. During the PM pre-game weekday peak hour, 28 of 34 intersections analyzed would have significant traffic impacts, and during the Saturday pre-game and post-game peak hours, 25 of 34 intersections analyzed would have significant impacts.

Some sections of the highway mainlines and several ramp junctions would incur level of service degradations and be significantly impacted. In Phase 1A, five of the seven highway mainline locations analyzed (including the westbound Grand Central Parkway and the southbound Whitestone Expressway) and five of the 12 ramp locations would be significantly impacted during at least one of the seven peak analysis hours. In Phase 1B, five of the seven highway mainline locations analyzed (including both directions of the Grand Central Parkway and Whitestone and Van Wyck Expressways) and seven of the 12 ramp locations would be significantly impacted during at least one peak hour. In Phase 2, four of the seven highway mainline locations analyzed (including the westbound Grand Central Parkway, and both directions of the Whitestone and Van Wyck Expressways) and seven of the 12 ramp locations would be significantly impacted during at least one peak hour.

The overall finding of the FSEIS traffic analysis is that the majority of locations analyzed would be significantly impacted, and that a broad range of mitigation measures would be needed. Depending on the peak hour, approximately one-half or more of the significantly impacted locations could be fully or partially mitigated with traffic signal phasing or timing changes, signalization of unsignalized intersections, lane re-striping, parking prohibitions, or turn prohibitions. Three locations at or near highway exit ramps would require more intensive mitigation measures such as roadway widenings and reconfigurations. These measures would collectively improve conditions but would not be able to fully mitigate all projected impacts. Final design for construction of those measures which do not fall under the jurisdiction of NYCDOT will be further reviewed by the New York State Department of Transportation (NYSDOT) closer to the time of construction. If these mitigation measures are modified or rejected by NYSDOT, some of the identified significant adverse impacts could be unmitigated.

Intersection traffic improvements have received approval from NYCDOT. Overall, these intersection traffic improvements—including signal phasing and timing changes, traffic signal installations, lane additions, lane re-striping, geometric improvements, turn prohibitions, channelization improvements and parking prohibitions—fall within the range of typical measures employed by NYCDOT in improving traffic conditions in New York City. Each of the highway network-related improvements beyond the operational improvements which are under NYCDOT jurisdiction would require a collaborative review process between NYCDOT and NYSDOT, and where appropriate, DPR closer to the time of construction when the design of those measures is finalized.

In order to verify the need and effectiveness of the mitigation measures proposed in the FSEIS (especially the more cost intensive highway network improvements), the developer, in consultation with ODMED and NYCDOT, will develop and conduct a detailed traffic monitoring plan at the completion of the buildout phases of the proposed project. The developer will submit to NYCDOT and ODMED design drawings for any mitigation measures as per American Association of State Highway and Transportation Officials (AASHTO) and NYCDOT specifications. NYCDOT will participate in the review process relating to all future modifications to geometric alignment, striping, and signage during the preliminary and final design phases. In addition, as mutually agreed upon, the City and the developer will be responsible for any cost associated with the monitoring effort. The developer of each phase of the project will be responsible for the cost of the design and construction of any or all mitigation measures identified in the FSEIS, for that phase.

Transit and Pedestrians

The FSEIS discloses that the proposed project would result in significant adverse bus line-haul impacts on the Q19, Q48, and Q66 bus lines and subway line-haul impacts on the No. 7 Subway line by the 2028 Phase 1B completion. The significant adverse line-haul impact on the No. 7 line would not occur until Phase 2 should NYCT be able to process an additional Manhattan-bound express train during the AM

peak hour. Upon the proposed project's full build-out in 2032, significant adverse transit impacts were identified for the Mets-Willets Point subway station stairs, the No. 7 subway line-haul, and Q19, Q48, and Q66 bus line-haul conditions. In addition, if NYCT reverts back to its pre-CitiField station operating plan for the Mets-Willets Point subway station, which would take place independent of the proposed project, additional interagency coordination is expected to take place to develop the appropriate game-day management strategies. However, additional impacts for the station's street-level connections and the unpaid zone passageway could occur during game days with this reconfiguration. It should be noted that any impacts that may be attributed to future passage of a reconfigured Mets-Willets Point subway station may potentially be deemed unmitigatable.

For pedestrian operations, significant adverse impacts were identified for numerous study area crosswalks during all three analysis years.

To mitigate the 2032 significant adverse stairway impacts, the effective widths of the S-3, S-2, and M-4 stairways would need to be widened. In addition, these stairway widenings would need to be accompanied by an ADA-compliant elevator between the street and mezzanine levels. An engineering feasibility study and design schematics were prepared and concluded that the recommended stairway widenings, as well as the installation of an ADA-compliant elevator, would be feasible. The proposed mitigation measures may be subject to modification due to NYCT's future master plan for the Mets-Willets Point subway station. Any modifications in conformance with the future master plan would provide equivalent functionalities that would similarly mitigate the stairway impacts identified above. Since the projected impacts that prompted the stairway and elevator feasibility study would not occur until Phase 2 of the proposed project, no funding commitments are in place at this time. The City will coordinate with NYCT and ODMED to ensure the proper mitigation would be implemented at the appropriate time and would add language to the RFP for Phase 2 of the project as well as to the development agreement and/or other legally binding agreements, requiring the designated developer to fund the implementation of this mitigation.

Since there are constraints on what service improvements are available to NYCT, the identified significant line-haul capacity impact on the No. 7 line would likely remain unmitigated absent the introduction of new LIRR service to the area. The addition of regular LIRR service to Willets Point would provide substantial relief to the No. 7 subway line and may prevent this significant adverse subway impact from materializing. To address the Q19, Q48, and Q66 bus line-haul impacts under Phases 1B and 2 in 2028 and 2032, respectively, substantial service improvements in terms of frequency of service would be required to meet the projected demand. Recognizing that these improvements may not be operationally viable or adequate in accommodating the projected future demand from developments planned for the District, discussions were initiated with NYCT to explore opportunities to extend existing bus routes from adjacent neighborhoods (e.g., downtown Flushing) and/or creating new bus routes. To accommodate these potential service improvements, new bus stops and layover areas would be needed in and around Willets West and the District. Additional discussions were initiated with MTA NYCT regarding the potential bus service improvements discussed above. MTA NYCT considered the Q19 westbound loop to serve Willets West and the District to be unfavorable due to its circuitous routing. The MTA Bus Company would consider extending the Q50 and NYCT would consider extending one of the current bus routes terminating in downtown Flushing to Willets West and the District initially. Additional bus route extensions to Willets West and the District would be considered based on future demand. In addition, several conceptual bus routing options were explored to provide the necessary layover areas and stop locations for the potential bus route extensions. MTA NYCT has found the conceptual bus routing options to be generally reasonable and feasible. While no definitive plans have been made at this time, the City and applicant will continue to collaborate with MTA and NYCT to ensure that adequate bus service improvements would be implemented.

To address the significant adverse pedestrian impacts, crosswalk widenings were proposed either solely or in conjunction with the proposed traffic mitigation measures. In some cases, achieving the widening necessary to mitigate the projected significant adverse impacts may not be feasible. Hence, these crosswalk impacts would be either partially mitigated or unmitigated. It should be noted that pedestrian volumes at some of the impacted crosswalks could be substantially lower if an areawide bus service improvement is implemented, as discussed above. As a result, some of the projected significant adverse pedestrian impacts may not occur or may occur to a lesser extent, requiring no or less mitigation. The reduction of pedestrian volumes at these crosswalk locations could also lessen pedestrian conflicts with turning vehicles, thereby potentially lessening the projected traffic impacts and required traffic mitigation measures. Similar to the proposed traffic mitigation measures, the eventual implementation of the proposed pedestrian mitigation measures would be subject to a monitoring program undertaken by the developer, in consultation with ODMED and NYCDOT, to determine actual needs upon completion and occupancy of various components during the three phases of the proposed project.

CONSTRUCTION

The proposed project would result in significant adverse construction impacts related to transportation and historic and cultural resources.

Transportation

The construction of the proposed project, from 2014 to 2032, would generate construction worker and truck traffic. Because of the lengthy duration of these activities, an evaluation of construction sequencing and worker/truck projections was undertaken to assess the potential transportation-related impacts. It is expected that the project construction activities would yield considerably less traffic than that projected for the proposed project and that parking and staging needs could be managed primarily within the District, or next to the stadium (for Lot B construction). However, given the high traffic volume in the existing and No Action conditions, and the inclusion of traffic from the project as it is being built out as well as construction traffic, significant adverse traffic impacts could still occur at some of the study area locations during construction. Where impacts during construction may occur, measures recommended to mitigate impacts associated with the proposed project could be implemented early to aid in alleviating congested traffic conditions. At locations where the proposed project is expected to result in unmitigated significant adverse traffic impacts, these impacts could similarly exist during construction.

Construction worker transit trips would occur outside of peak periods of transit ridership and would be distributed and dispersed to the nearby transit facilities, and would not result in any significant adverse transit impacts. However, the significant adverse transit impacts disclosed for the 2032 With Action condition may also occur during peak construction in 2031. Similar mitigation measures as those identified for the 2032 With Action condition are expected to also address the potential transit impacts during construction. As with the 2028 and 2032 With Action conditions, the projected subway line-haul impact during the weekday AM peak period may remain unmitigated.

Pedestrian trips during peak construction in 2031 would primarily be concentrated during off-peak hours (6 to 7 AM and 3 to 4 PM) and would be distributed among numerous pedestrian facilities in the area. Accordingly, there would also not be a potential for significant adverse pedestrian impacts attributable to the projected construction worker pedestrian trips. However, the significant adverse pedestrian impacts disclosed for the 2032 With Action condition may also occur during peak construction in 2031. Similar mitigation measures as those identified for the 2032 With Action condition are expected to also address the potential pedestrian impacts during construction. At locations where the proposed project is expected

to result in unmitigated significant adverse pedestrian impacts, these impacts could similarly exist during construction.

Historic and Cultural Resources

Consistent with the findings in the 2008 FGEIS, construction activities related to the development that would occur within the Special Willets Point District during Phase 2 of the proposed project would be anticipated to result in the demolition of the former Empire Millwork Corporation Building, which was found by OPRHP to be eligible for listing on the State and National Registers of Historic Places (S/NR). Demolition of this structure would be considered a significant adverse effect on this architectural resource.

ALTERNATIVES ANALYZED IN THE FSEIS

The FSEIS examined two alternatives to the proposed project: a No Action Alternative and a No Unmitigated Significant Impacts Alternative.

NO ACTION ALTERNATIVE

The No Action Alternative assumed that the proposed project would not be implemented (i.e., none of the discretionary approvals proposed as part of the proposed project would be adopted).

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

NO UNMITIGATED SIGNIFICANT IMPACTS ALTERNATIVE

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

For historic and cultural resources, this alternative would avoid the demolition of the former Empire Millwork Corporation Building that would occur with Phase 2 of the proposed project. Although this could be achieved through adaptive reuse, exterior elements would still need to be upgraded to comply with building codes and noise attenuation requirements, and flood protection measures such as gates or pumps would be required to comply with flood insurance requirements. Overall, this alternative would

reduce the footprint of any new development, which would result in greater density in the remainder of the District, fewer housing units, less open space, or some combination of these possibilities. Furthermore, the former Empire Millwork Corporation Building could be demolished as-of-right under existing conditions, and mitigation measures such as photographic documentation would not be required.

For traffic, the proposed project and the potential future development on Lot B would result in significant adverse impacts that cannot be fully alleviated with practical mitigation measures. Because of existing congestion at a number of intersections, even a minimal increase in traffic would result in unmitigated impacts. Based on a sensitivity analysis of intersections within the study area, it was determined that in all three phases of the proposed project, the addition of five or fewer vehicles through some intersections would trigger an impact that cannot be fully mitigated. Thus, almost any new development at the project site would result in unmitigated traffic impacts, and no reasonable alternative could be developed to avoid such impacts.

For transit, the proposed project and potential future development on Lot B would result in significant adverse subway line-haul impacts on the Manhattan-bound No.7 subway line express service during the 2028 and 2032 AM peak periods and on station operations at the Mets-Willets Point subway station under the 2018, 2028, and 2032 With Action conditions. As described above, should NYCT revert back to its pre-CitiField station operating plan for the Mets-Willets Point subway station, the significant adverse impacts on station operations may potentially be deemed unmitigatable. Although the City had consulted with the MTA on extending regular LIRR service to Willets Point, which would be expected to provide substantial relief to the No. 7 subway line and may prevent this significant adverse subway impact from materializing, the implementation of the LIRR service improvement would depend on whether the actual future demand shows that such service improvement is warranted. It should be noted that this significant adverse line-haul impact on the No. 7 line would not occur until Phase 2 should NYCT be able to process an additional Manhattan-bound express train during the AM peak hour. To avoid this potentially unmitigatable impact, portions or all of Phase 1B and Phase 2 of the proposed project and the potential future development on Lot B would need to be eliminated from the current development plan. Almost any new development at the project site would result in the potentially unmitigatable impact on station operations at the Mets-Willets Point subway station, and no reasonable alternative could be developed to avoid such impacts without substantially compromising the proposed project's stated goals.

For pedestrians, the proposed project and potential future development on Lot B would result in significant adverse impacts at seven study area crosswalks upon Phase 1A completion, five study area crosswalks upon Phase 1B completion, and seven study area crosswalks upon the Phase 2 full build-out in 2032, respectively. No reasonable alternative could be developed to avoid these impacts without substantially compromising the proposed project's stated goals.

GROWTH-INDUCING ASPECTS OF THE PROJECT

The proposed project would transform surface parking lots and a largely underutilized site with substantial environmental degradation into a lively, mixed-use, sustainable community and regional destination. The proposed project would introduce a variety of uses, including residential, retail, office, entertainment, hotel, convention center, community facility, open space, and parking. Consistent with the assumptions of the 2008 FGEIS, it is anticipated that if the proposed project is approved and the project site is redeveloped, additional development could occur on CitiField parking Lot B. While specific development plans for Lot B have not yet been proposed, it is anticipated that approximately 280,000 square feet (sf) of office and 184,500 sf of retail could potentially be developed on Lot B.

While any future development on Lot B would require its own environmental review process subject to CEQR, consistent with the 2008 FGEIS, the FSEIS considered the cumulative impacts of both the proposed project and the potential future development on Lot B. While the uses proposed for Willets West and the Special Willets Point District would contribute to growth in the local Queens, City, and State economies, they would not be expected to induce notable growth outside of the project site and the anticipated development on Lot B. It is unlikely that the proposed project and potential future development on Lot B would alter land use patterns in surrounding neighborhoods. Given the recent trend to redevelop underutilized sites near the Flushing River waterfront, it is possible that the proposed project and new development on Lot B could encourage further redevelopment of some nearby underutilized sites along the Flushing River. However, given that such changes are already under way, potential development parcels are limited, and as the project site is physically separated from surrounding neighborhoods by water bodies, roadways, and parkland, the ability of the proposed project to alter land use and economic patterns or induce substantial growth in the study area would be minimal.

Substantial infrastructure and roadway improvements would be provided as part of the proposed project. The infrastructure and roadway improvements included in the proposed project are intended to support the anticipated growth in the Willets West and District portions of the project site, as well as the potential future development of Lot B. The infrastructure in the study area is already well-developed such that improvements associated with the proposed project would not induce additional growth.

IRREVERSIBLE AND INTRETRIEVABLE COMMITMENT OF RESOURCES

There are a number of resources, both natural and built, that would be expended in the construction and operation of the proposed project. These resources include the building materials used in construction of the proposed project; energy in the form of gas and electricity consumed during construction and operation of the proposed project; and the human effort (time and labor) required to develop, construct, and operate various components of the proposed project. They are considered irretrievably committed because their reuse for some purpose other than the proposed project would be highly unlikely. The proposed project constitutes a commitment of the project site as a land resource, thereby rendering the land's use for other purposes infeasible. However, the transformation of surface parking lots and a largely underutilized site with substandard conditions and substantial environmental degradation into a lively, mixed-use, sustainable community and regional destination would be an improvement to the District and areas surrounding CitiField.

CONCLUSION

Overall, the Willets Point Development project will have many significant economic, environmental, civic, and social benefits. It would remediate and transform the area surrounding CitiField, which is largely separated from adjoining neighborhoods by major highways, into a thriving new neighborhood and regional destination. By providing development that spans both sides of the new CitiField, the proposed project would allow for a more comprehensive and continuous neighborhood linking Flushing and Corona. The environmental degradation of the Special Willets Point District would be remediated. The commercial components of the proposed project would provide jobs and create new retail, hotel and entertainment uses that would complement the adjacent sports venue and strengthen economic activity in the neighborhood, borough, and City. The substantial residential component (which includes affordable housing units) would accommodate a portion of the City's current and future housing needs. The new structures and open spaces are intended to create an active streetscape that includes retail uses as part of a diverse mixed-use program, enhancing the pedestrian experience. As discussed above, the Willets Point Development project would result in several significant adverse impacts that cannot be mitigated;

however, the benefits of the Willets Point Development project outweigh the adverse environmental impacts, many of which can be mitigated by the measures identified in the FSEIS and summarized in this Findings Statement.

The proposed project will remediate and transform the area surrounding CitiField. The proposed entertainment and retail destination of Willets West would complement the anticipated development within the District, and both would connect Flushing to the east with Corona to the west through the creation of an unbroken series of uses along Roosevelt Avenue stretching from east of the Flushing River to west of the Grand Central Parkway. Over 2,000 units of affordable housing would be developed to accommodate a portion of the City's current and future affordable housing needs. The project's retail components would capture spending that currently is lost to the surrounding suburbs, and would thereby strengthen economic activity in the neighborhood, borough, and City. The proposed project would represent a significant investment by the City to improve the infrastructure of the project area. Raising the District portion of the project site out of the floodplain would not only minimize the potential loss of life, structures, and natural resources caused by flooding and erosion, but would also protect the City's new infrastructure investment. Eliminating flooding within the District and improving the quality of the soil substrate on the site would also improve water quality in Flushing Bay.

Neither the No Action Alternative nor the No Unmitigated Significant Impacts Alternative would accomplish the project's goals and objectives.

On balance, after considering the benefits and impacts of the project disclosed in the FSEIS, ODMED concludes that the social, economic, and environmental benefits provide a rationale to proceed with the Willets Point Development project notwithstanding its environmental impacts.

CERTIFICATION OF FINDINGS TO APPROVE/FUND/UNDERTAKE

Having considered the relevant environmental impacts, facts, and conclusions disclosed in the DSEIS, including comments on the DSEIS and the responses thereto, the FSEIS and the preceding written facts and conclusions, and having weighed and balanced relevant environmental impacts with social, economic, and other essential considerations required by 6 NYCRR 617.11, the Office of the Deputy Mayor for Economic Development finds and certifies that:

- the requirements of Article 8 of the New York State Environmental Conservation Law (SEQRA) and its implementing regulations found at 6 NYCRR Part 617 and the requirements of City Environmental Quality Review (CEQR) found at Title 62, Chapter 5, of the Rules of the City of New York and as set forth in Executive Order 91 of 1977, as amended, have been met; and
- consistent with social, economic, and other essential consideration of state and city policy, from among the reasonable alternatives available, the project is one that avoids or minimizes adverse environmental impacts to the maximum extent practicable, and that adverse environmental impacts will be avoided or minimized to the maximum extent practicable by incorporating as conditions to the decision those mitigation measures that the FSEIS and this Statement of Findings have identified as practicable.



Wesley O'Brien
Assistant to the Mayor
On Behalf of the Office of the Deputy Mayor for Economic Development

12/20/13

Date