Chapter 1: PROJECT DESCRIPTION

1.1 Introduction

This Draft Environmental Impact Statement ("DEIS") for the proposed Brooklyn Developmental Center ("BDC") Mixed-Use Project ("Project") in Kings County, New York, has been prepared by the New York State Urban Development Corporation d/b/a Empire State Development ("ESD"), pursuant to the New York State Environmental Quality Review Act ("SEQRA"), codified in Article 8 of the Environmental Conservation Law, and its implementing regulations (6 NYCRR Part 617).

Prior to the preparation of this DEIS, the applicant, Vital BDC LLC, a conditionally designated development team consisting of Apex Building Company and/or its affiliates, L+M Development Partners Inc. and/or its affiliates, RiseBoro Community Partnership Inc., and Services for the UnderServed, Inc. ("S:US") prepared a SEQRA Full Environmental Assessment Form ("FEAF") Part I, and ESD prepared the New York State Department of State ("NYSDOS") Coastal Management Program Coastal Assessment Form ("CAF") on April 29, 2021. (Please refer to Appendix A of this DEIS). ESD determined the Proposed Actions to be a Type I Action per SEQRA, with the potential to result in at least one significant adverse environmental impact. ESD issued a notice of Public Scoping and Intent to Prepare a DEIS for the Proposed Actions and a Draft Scope of Work ("SOW"), a/k/a, "scope of analysis," to prepare an Environmental Impact Statement ("EIS") on September 14, 2020. ESD held a public scoping session on the Draft SOW on October 14, 2020. Public comments received on the Draft SOW were integrated into the Final SOW, which has guided the preparation of this Draft EIS.

Following a public hearing and collection of public comments on this DEIS, ESD will issue a Final Environmental Impact Statement ("FEIS"), followed by a Findings Statement in the ensuing months. ESD will prepare a General Project Plan ("GPP"), as described herein, to implement the Proposed Actions (for more information, refer to Chapter 23, "Mitigation Measures"). Public review and comment on the GPP will be coordinated with the SEQRA process.

ESD, with supported project funding by New York State Homes and Community Renewal ("HCR"), proposes the comprehensive redevelopment initiative, "Brooklyn Developmental Center Mixed-Use Project." The Proposed Project involves the acquisition of the approximately 28-acre Lot 300 of Block 4586 in Kings County (Brooklyn), New York from the Dormitory Authority of the State of New York ("DASNY") by ESD and the disposition of an approximately 27.1-acre parcel comprising a part of Lot 300

("Project Site") by ESD to Vital BDC LLC to facilitate the redevelopment of the Project Site into mixed-use affordable housing. The Project Site comprises the central portion of the former BDC campus, which comprises most of the remainder of the former BDC campus available for disposition and redevelopment after a prior disposition to a different developer of the northern and southern portions of the former BDC campus for the Fountain Avenue Land Use Improvement and Residential Project ("Fountain Avenue Project"). The approximately 0.99-acre southeastern portion of Lot 300, which is part of the overall Lot 300 that would be acquired by ESD, is not contemplated for development as part of the Proposed Project and is not referred to as part of the Project Site herein.

The Proposed Project entails ESD's adoption of a GPP to facilitate the construction of up to approximately 2,475,760 square feet ("sf") of residential space (approximately 2,623 new units of affordable housing), approximately 143,992 sf of commercial space (including neighborhood-oriented retail, supermarket, movie theater, gym, and restaurant, and other commercial uses), approximately 55,384 sf of community facility space (including senior center, One Brooklyn Health Clinic,[1] and community center), approximately 29,746 sf of light manufacturing space (including vertical farming/agriculture, Meals on Wheels kitchen, and other light manufacturing), approximately 213,643 sf of enclosed parking (approximately 392 enclosed parking spaces, which does not include the proposed 398 surface parking spaces to be included in the Proposed Project), approximately 12,250 sf of other uses (including a security booth/information station, compost and biodigester, and trash collection point), an approximately 1-acre urban farm, and approximately 6 acres of open space (including approximately 4 acres of publicly-accessible open space and approximately 2 acres of private open space). Construction would be undertaken in multiple phases; the first phase would commence in 2022, and the final phase would be complete in 2030, with full occupancy by 2031. Each phase would entail the construction of a group of connected residential buildings along with a mix of additional uses such as commercial space, community facility space, light manufacturing space, streets, open space, and the planting of street trees.

[1] An important component of the Vital Brooklyn initiative's healthcare transformation strategy is New York State's support for the establishment of the One Brooklyn Health System, an integrated healthcare system comprised of Interfaith Medical Center, Kingsbrook Jewish Medical Center, and Brookdale University Hospital and Medical Center. The One Brooklyn Health System and the community-based healthcare component of the Vital Brooklyn initiative is intended to support the development of a clinically comprehensive ambulatory care network. As a condition of making the Project Site available for development, the developer would construct the core and shell of a new approximately 30,000 sf ambulatory care facility with services to be consistent with the needs of the Proposed Project's tenant mix.

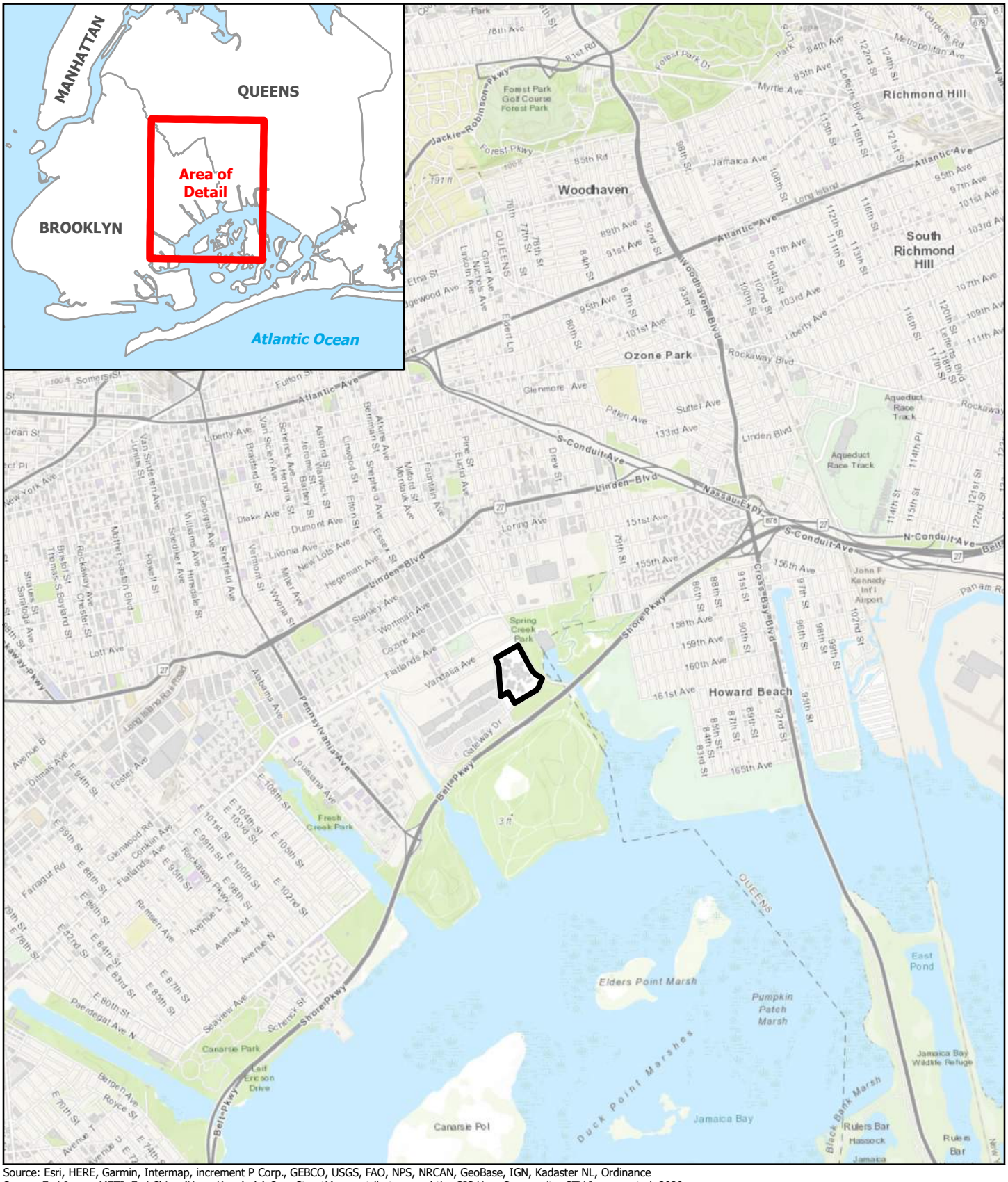
1.2 Project Identification

PROJECT LOCATION

The Project Site is located in the Spring Creek section of the East New York neighborhood in Brooklyn (Kings County), New York (see Figure 1-1, "Project Location"). It comprises approximately 1,180,557 sf (+/- 27.1 acres) of a block centrally positioned on the former BDC campus between two other former portions of the BDC campus that are currently under development adjacent to the site as part of the Fountain Avenue Project. The irregularly shaped block (Block 4586) is bounded by Vandalia Avenue to the north, Seaview Avenue to the south, Fountain Avenue to the east, and Erskine Street to the west (see Figure 1-2, "Tax Map").

The former BDC campus to be redeveloped (see Figure 1-3, "Aerial Photograph of Project Site and Vicinity") consists of approximately 512,000 sf with seven institutional buildings that served as the residential and support buildings for BDC during its operations. Prior to 2016, these buildings were occupied by resident patients. BDC no longer provides on-site treatment and care for patients, and so the BDC buildings are no longer occupied by residents. Approximately 225 workers remain on site within three buildings, two that are still used for office space and one as a power plant; however, it is anticipated that the workers within the office buildings will be relocated prior to disposition of the Project Site, unrelated to the Proposed Actions. A certain number of staff will remain on site maintaining the physical plant and providing security to the site.

Parkland lies across Fountain Avenue to the east and across Seaview Avenue to the south of the BDC campus, with the Belt Parkway along the Jamaica Bay waterfront further to the south (see Figure 1-3, "Aerial Photograph of Project Site and Vicinity). The Gateway Center commercial area is to the west of the block and the Gateway Estates II residential development is to the west and north of the block.



Source: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordinance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community; STV Incorporated, 2020.

N

0 0.5 1 Mile

Figure 1-1

PROJECT LOCATION

Block 4586, Lot 300

BDC Mixed-Use Project

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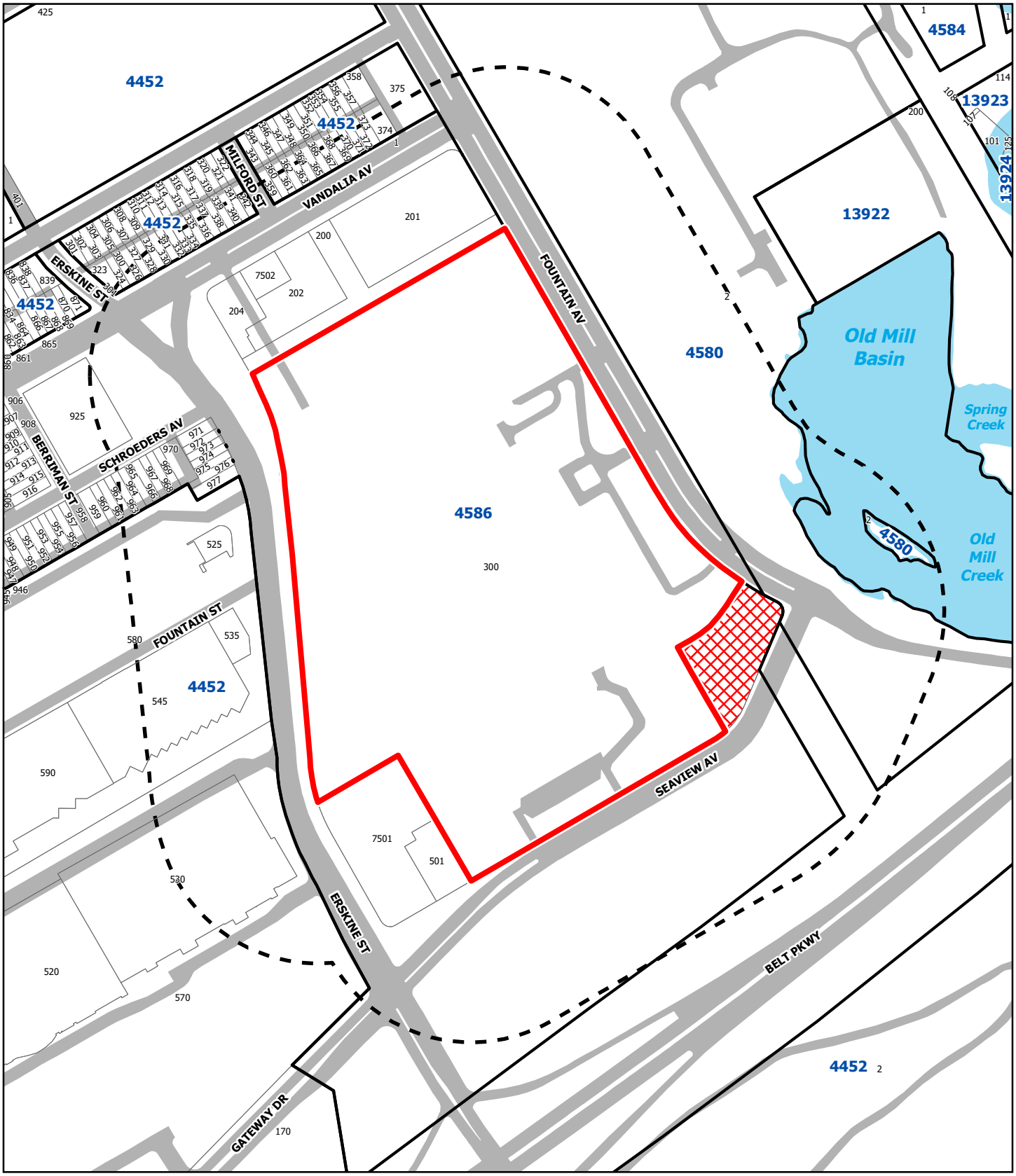

Source: New York City Department of City Planning, MapPLUTO 18v2; STV Incorporated, 2020.

N

0 200 400 Feet

Project Site

400-ft Study Area

To be acquired by ESD. Not to be developed as part of the proposed project.

9 Tax Block

9 Tax Lot

Figure 1-2

TAX MAP

BDC Mixed-Use Project

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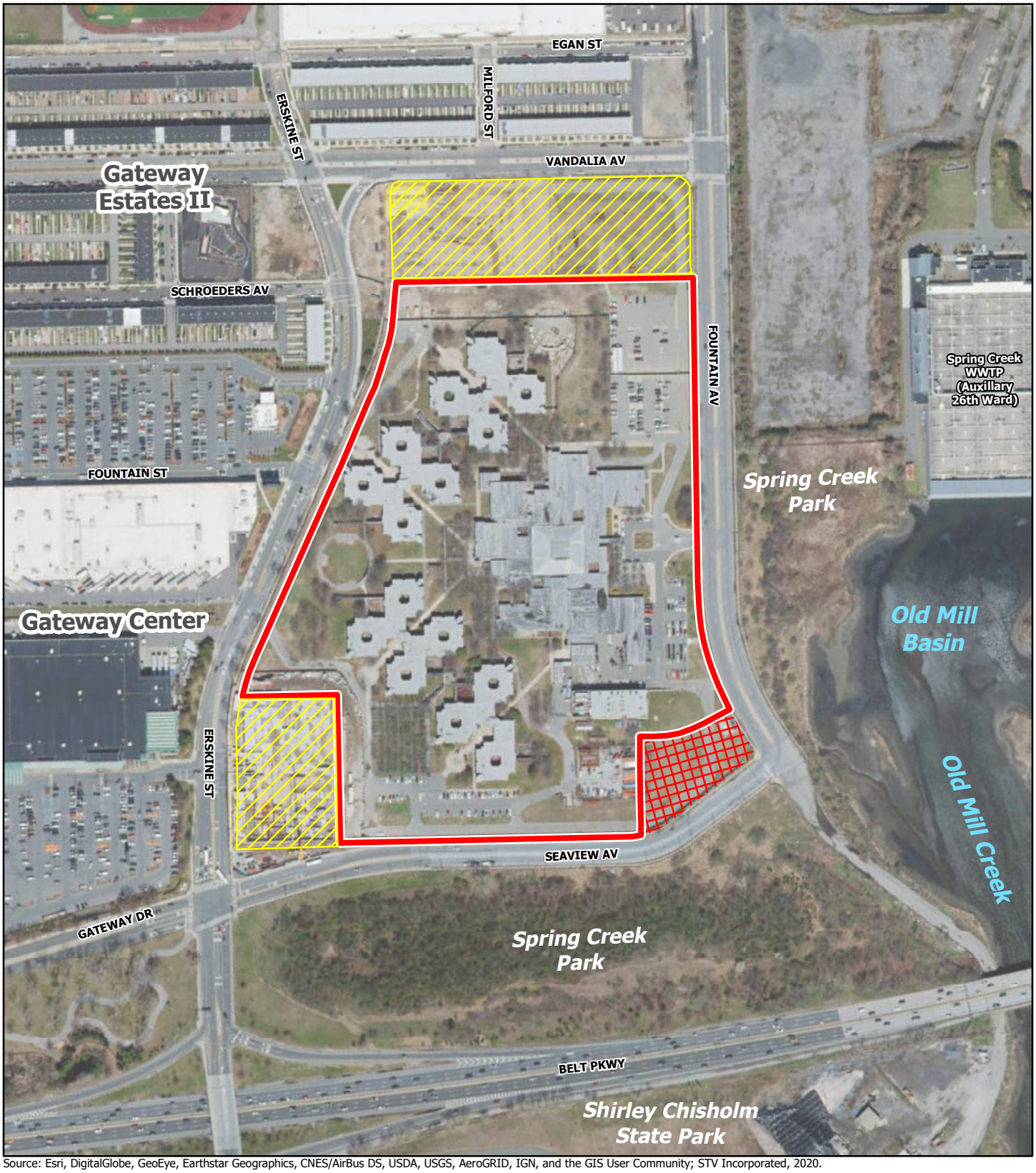

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/AirBus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community; STV Incorporated, 2020.

N

0 200 400 Feet

Project Site

Fountain Avenue Project (Under Development)

To be acquired by ESD. Not to be developed as part of the proposed project.

Figure 1-3

AERIAL PHOTOGRAPH OF PROJECT SITE AND VICINITY

BDC Mixed-Use Project

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PROJECT CONTEXT

The site is currently operated by the New York State Office for People with Developmental Disabilities ("OPWDD"). In an effort to reduce its facilities footprint, OPWDD is consolidating its operations and relocating its operations to nearby facilities.

Two portions of the former BDC campus are already under construction as part of the separate Fountain Avenue Project, which is providing for the development of approximately 1,200 units of affordable housing on the northern portion of the block (Block 4586, Lot 200) and the southwest corner of the block (Block 4586, Lot 500).

The Project Site and all of the study area, except for the portion of Spring Creek Park to the east of Fountain Avenue, is located within the Fresh Creek Urban Renewal Area ("FCURA"), which extends from approximately Flatlands Avenue at its northern edge, south to the Belt Parkway, east to Fountain Avenue, and west to Schenck Avenue and Hendrix Creek. The area surrounding the blocks to the west and north has been developed as the phased build-out of the Gateway Center commercial area and the Gateway Estates II residential development. This development followed the Fresh Creek Urban Renewal Plan ("FCURP") established by the New York City Department of Housing Preservation and Development ("NYCHPD") in 1967; the FCURP was amended in 1982, following the 1972 construction of the BDC and surrounding streets, and then amended a second time in 1996, at which point the first phase of the Gateway Estates II residential development was subject to environmental review. (The second phase of development is currently nearing completion[2]).

The approximately 0.99-acre southeastern portion of Lot 300, which is part of the overall Lot 300 that would be acquired by ESD, is not being contemplated for development as part of the Proposed Project and is not referred to as part of the Project Site herein.

[2] *Gateway Estates II Final Environmental Impact Statement;* New York City Department of Housing Preservation and Development, Lead Agency, February 4, 2009.

PROPOSED DEVELOPMENT PROGRAM

ESD proposes the disposition of New York State-owned property on Lot 300 of Block 4586 to facilitate the redevelopment of a parcel comprising part of Lot 300 (the Project Site) to a conditionally designated development team, Vital BDC LLC. ESD would adopt a GPP to facilitate the construction of the Proposed Project.

The Proposed Project would provide up to approximately 2,475,760 sf of residential space (approximately 2,623 new units of affordable housing), approximately 143,992 sf of commercial space (including neighborhood-oriented retail, supermarket, movie theater, gym, and restaurant), approximately 55,384 sf of community facility space (including senior center, One Brooklyn Health Clinic, and community center), approximately 29,746 sf of light manufacturing space (including vertical farming/agriculture, Meals on Wheels kitchen, and other light manufacturing), approximately 213,643 sf of enclosed parking (approximately 392 enclosed parking space, which does not include the proposed 398 surface parking spaces to be included in the Proposed Project), approximately 12,250 sf of other uses (including security booth/information station, compost and biodigester, and trash collection point), an approximately 1-acre urban farm, and approximately 6 acres of open space (including approximately 4 acres of publicly-accessible open space and approximately 2 acres of private open space) (see Figure 1-4, "Site Plan") (see Table 1-1, "Proposed Development Program by Phase").

Table 1-1: Proposed Development Program by Phase

Phase	Building	Land Use	Use Detail	Area (SF)	Resid. Units	Parking Spaces	Construction Period	Full Occupancy Date
1	C1	Residential		164,385	185	-	2022 to 2025	November 2025
		Community Facility	One Brooklyn Health Clinic	31,230	-	-		
	C2	Residential		248,301	273	-		
		Commercial or Comm Facility	neighborhood-oriented retail	12,068	-	-		
		Parking	Interior parking	29,673	-	57		
	C3	Residential		137,937	129	-		
	G	Other	security booth, information station	700	-	-		
	I	Other	compost and biodigester, potential fuel cell	8,580	-	-		

Table 1-1: Proposed Development Program by Phase (cont.)

Phase	Building	Land Use	Use Detail	Area (SF)	Resid. Units	Parking Spaces	Construction Period	Full Occupancy
1	J	Other	trash collection point	2,970	-	-	2022 to 2025	November 2025
	Other Parking					61		
2	A1	Residential		202,444	231	-	2023 to 2026	February 2027
		Commercial	Neighborhood-oriented retail	9,142	-	-		
		Parking	interior and surface parking	11,644	-	97		
	A2	Residential		253,309	281	-		
		Commercial	supermarket	25,473	-	-		
	B1	Residential		233,814	252	-		
	Other Parking					73		
3	A3	Residential		146,757	138	-	2025 to 2027	September 2028
	B3	Residential		156,231	149	-		
	D3	Residential		104,958	98	-		
	E3	Residential		104,958	98	-		
	F	Community Facility	community center, arts and culture, youth enrichment classes	15,950	-	-		
	Other Parking					97		
4	B2	Residential	seniors	198,317	231	-	2026 to 2028	July 2029
		Community Facility	senior Center	8,204	-	-		
	H	Light Manufacturing	vertical farming/agriculture; Meals on Wheels Kitchen; other light manufacturing	29,746	-	-		
		Restaurant	RiseBoro Café	2,530	-	-		
	Other Parking					14		
5	D1	Residential		179,046	205	-	2027 to 2030	January 2031
	D2	Residential		127,890	128	-		
	E1	Residential		127,890	138	-		
	E2	Residential		89,523	87	-		
	Other Parking					81		

Note: In addition to the 790 structured and surface parking spaces indicated in this table, an additional 63 on street parking spaces would be provided along North Street, South Street, and Field Drive.

Table 1-1: Proposed Development Program by Phase (cont.)

Phase	Building	Land Use	Use Detail	Area (SF)	Resid. Units	Parking Spaces	Construction Period	Full Occupancy
6	K	Commercial	movie theater; gym	94,779	-	-	2028 to 2030	January 2031
		Parking	interior parking	172,326	-	310		
			TOTAL	**2,930,775**	**2,623**	**790**		

To be acquired by ESD. Not to be developed as part of the Proposed Project.

0 25' 50' 100' 200'

Source: Vital Brooklyn; Dattner Architects; SCAPE; STV Incorporated, 2021.

Figure 1-4

SITE PLAN

BDC Mixed-Use Project

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It is also expected that the GPP would require that 100 percent of the approximately 2,623 residential units developed as part of the Proposed Project would be income restricted with most of the units affordable to households earning between 30 and 80 percent of the area median income ("AMI"). The GPP would also require that of these total units, approximately 231 units (or approximately 9 percent of units) would be set aside specifically for senior citizens, and approximately 503 units (or approximately 19 percent of units) would be designated as supportive housing for residents with intellectual and developmental disabilities ("I/DD"), residents with behavioral health issues (severe mental illness), the frail and elderly, youth aging out of foster care, residents who have been formerly incarcerated, and military service members with disabilities (see Table 1-2, "Proposed Affordable Housing Types and Number of Units").

Table 1-2: Proposed Affordable Housing Types and Number of Units

Affordable Housing Types [1]	Number of Units
General Housing	
General Population	Approx. 1,958
Senior Citizen [2]	Approx. 162
Supportive Housing [3,4]	
Intellectual and Developmental Disabilities (I/DD)	Approx. 204
Behavioral Health [5]	Approx. 102
Frail/Elderly (senior citizen housing) [2]	Approx. 69
Youth Aging Out of Foster Care	Approx. 41
Formerly Incarcerated	Approx. 46
Military Service with Disabilities	Approx. 41
Grand Total	**Approx. 2,623**

Notes:
[1] Income Restricted Housing
[2] Senior citizen housing units, including supportive housing, total approximately 231
[3] Available to residents who receive publicly-funded support and services
[4] Supportive housing units total approximately 503
[5] Severe mental illness

Source: Vital BDC LLC

The Proposed Project would include alternative energy infrastructure to serve each of the building groups that would be constructed as part of the Proposed Action; the buildings constructed would partially rely on renewable energy sources, expected to include on-site solar and/or geothermal loop to serve each building group. The residential development, building construction, and building operations would be Enterprise Green Communities Certified or achieve a higher green building standard.

The Proposed Project would create three new public streets (North Street, South Street, and Field Drive) and four privately-owned, publicly-accessible shared pathways (Creek, West, East, and Park walks). These pathways would be similar to "shared streets," *i.e.*, paved roadways designed for slow travel speeds where pedestrians and cyclists share the right-of-way with slow-moving vehicles. Existing intersections surrounding the Project Site would be modified to accommodate newly mapped streets.

It is anticipated construction would be undertaken in multiple phases; with the first phase commencing in 2022 and the final phase being completed in 2030, with full occupancy by 2031. Each phase would entail the construction of a group of connected residential buildings along with commercial space, community facility space, light manufacturing space, streets, open space, and the planting of street trees (see Figure 1-5, "Project Rendering"). For the purposes of applicable EIS analyses, the following estimated schedule for construction phasing and occupancy is assumed, based on typical construction timelines (see Figure 1-6: "Phasing Site Plan"):

- The demolition of existing buildings and construction of one mid-rise[3] mixed-use building with One Brooklyn Health Clinic (Building C1), one mid-rise mixed-use building with a neighborhood-oriented retail use and interior parking (Building C2), one maisonette residential building (Building C3), a security booth/information station (Building G), a compost and biodigester (Building I), a trash collection point (Building J) on the western and southern portions of the Project Site, a partial plaza, and the construction of Field Drive and South Street between Erskine Street and Field Drive. Demolition would begin in June 2022 and end in October 2022. Construction would begin in October 2022 and end in February 2025, with full occupancy by August 2025.

- The demolition of existing buildings and development of one mid-rise mixed-use building with a neighborhood-oriented retail use and interior and surface parking (Building A1), one mid-rise mixed-use building with a supermarket (Building A2), one mid-rise residential building (Building B1) on the northwestern and northeastern portions of the Project Site and the construction of North Street, and a partial plaza. Demolition would begin in August 2023 and end in December 2023. Construction would begin in December 2023 and end in April 2026, with full occupancy by November 2026.

- The demolition of existing buildings and development of four maisonette residential buildings (Buildings A3, B3, D3, and E3), one community center (Building F) in the central portion of the

[3] The Proposed Project comprises five building groups, "A," "B," "C," "D," and "E," and six individual buildings, "F" (community center), "G" (security booth), "H" (vertical farming, meals on wheels kitchen, café, other light manufacturing), "I" (compost and biodigester), "J" (trash collection point), and "K" (movie theater, gym, and parking). The five building groups comprise individual buildings ranging in height from approximately 108 ft (approximately 6 stories, "maisonette") up to maximum 224 ft inclusive of bulkhead (maximum 17 stories, "mid-rise"). The individual buildings would be constructed up to the following approximate heights: 35 ft ("G"), 50 ft ("H," "I," and "J"), 60 ft ("F"), and 125 ft ("K").

Project Site, and the majority of central open space. Demolition would begin in December 2024 and end in June 2025. Construction would begin in June 2025 and end in December 2027, with full occupancy by June 2028.

- The development of one mid-rise mixed-use building with a senior center (Building B2) and a mixed-use building with light manufacturing uses (including vertical farming/agriculture, Meals on Wheels Kitchen, and other light manufacturing) and a restaurant (Building H) on the eastern and central portions of the Project Site. Construction would begin in June 2026 and end in October 2028, with full occupancy by April 2029.
- The demolition of existing buildings and development of four mid-rise residential buildings (Buildings D1, D2, E1, and E2) on the eastern portion of the Project Site and the construction of South Street between Field Drive and Fountain Avenue. Demolition would begin in June 2027 and end in December 2027. Construction would begin in December 2027 and end in April 2030, with full occupancy by October 2030.
- The development of a commercial building with uses such as a movie theater, gym, and interior parking (Building K) on the southern portion of the Project Site. Construction would begin in December 2028 and end in December 2030, with full occupancy by 2031.

Aerial view of illustrative redevelopment looking northwest

Source: Vital BDC LLC, 2021.

For illustrative purposes only

Figure 1-5

RENDERING

BDC Mixed-Use Project

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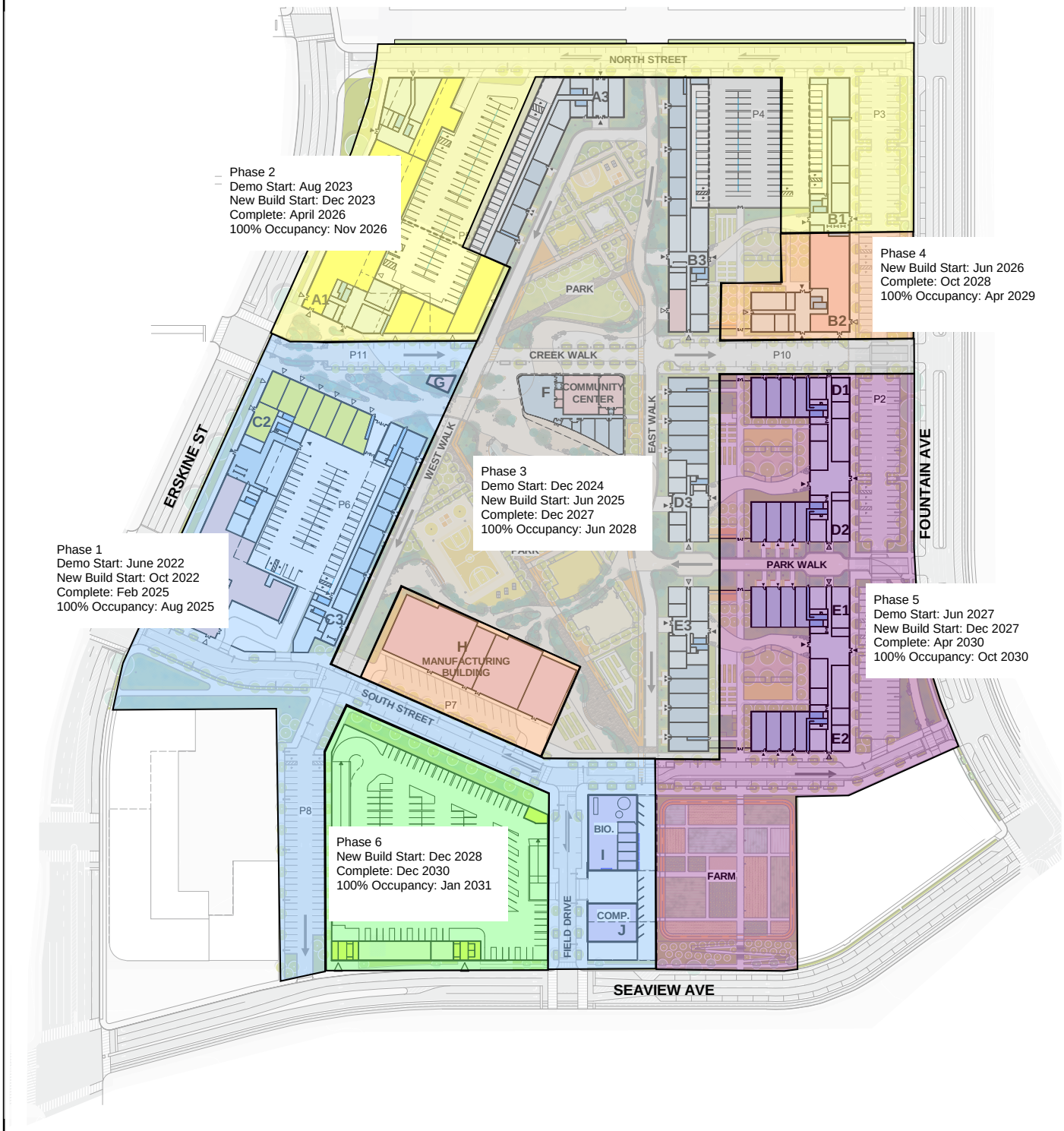

Source: Vital Brooklyn; Dattner Architects; SCAPE; STV Incorporated, 2021.

Figure 1-6

CONSTRUCTION PHASING SITE PLAN

BDC Mixed-Use Project

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1.3 Purpose and Need

The Proposed Actions would facilitate the construction of affordable housing in a significantly underserved portion of Brooklyn, in the area known as East New York. The proposed acquisition, sale, and redevelopment of the Project Site would allow for the reuse of substantially underdeveloped acreage to provide affordable housing in a significantly underserved portion of Brooklyn and would include supportive housing, as well as housing for senior citizens. As part of New York State's Vital Brooklyn initiative, a community development initiative that leverages state programs and resources to improve health and wellness in Central Brooklyn, the Proposed Project would also improve economic opportunities in East New York, which is located within one of the most socially and economically disadvantaged areas of New York State, with measurably higher than average rates of obesity, diabetes, and high blood pressure, limited access to healthy foods or opportunities for physical activity, and wide economic disparities from unemployment and poverty levels. The Proposed Project seeks to ameliorate these conditions by creating a community that is health-based, is centered around open space, provides walkable access to retail destinations, and is within close proximity to a significant regional park (Shirley Chisholm State Park). Further, the Proposed Project would provide space for job creating operations that would also support community health, such as meal delivery services and urban farming uses. As such, the Proposed Project would provide affordable housing to an underserved portion of Brooklyn, including supportive housing and housing for senior citizens, and improve wellness and economic opportunities as part of the Vital Brooklyn initiative.

1.4 Required Approvals

The Proposed Project is expected to require the following actions and approvals:

- ESD adoption and affirmation of a GPP, including overrides of the New York City Zoning Resolution ("ZR") pursuant to the *New York State Urban Development Corporation Act, Chapter 174 of the Laws of 1968* (the "*UDC Act*"). ESD would establish Design Guidelines (the "Design Guidelines") for the Proposed Project that would address among other things, use, bulk and dimensional parameters that would be applied in lieu of zoning. The Proposed Project would be required to comply with the Design Guidelines.[4]

[4] Mitigation measures identified through the SEQRA process, as well as other project commitments relating to the potential environmental impacts of the Proposed Project, may be implemented and enforced by ESD through various mechanisms (the "ESD Environmental Controls"), including the Restrictive Declaration, General Project Plan, and Design Guidelines.

- Disposition of property from DASNY to ESD and sale of property by ESD to the designated developer
- Possible funding and/or financing from the following:
    - New York State Home and Community Renewal
    - New York State Office for People with Developmental Disabilities
    - New York State Office of Mental Health
    - New York City Department of Housing Preservation and Development
    - New York City Housing Development Corporation, and
- Possible need for a New York State Department of Environmental Conservation State Pollution Discharge Elimination System ("SPDES") permit for discharges of groundwater during construction.
- Mapping action to be undertaken by the designated developer in the future in order to map private land (proposed North Street, South Street, and Field Drive) as City Streets.

1.5 Analysis Framework

METHODOLOGY

Because the Proposed Actions would result in development in New York City, this EIS is prepared following the format of the *New York City Environmental Quality Review ("CEQR") Technical Manual,* and EIS analyses are informed by the guidance of the *CEQR Technical Manual.* In this way, the Proposed Actions may be assessed in a manner that appropriately reflects the urban conditions and setting of the Project Site.

ALTERNATIVES

Project Site

No alternative site is considered for the Proposed Actions, the primary purpose of which is ESD's acquisition of Lot 300 of Block 4586 in Kings County, New York, and the sale of a parcel comprising part of Lot 300 (Project Site) and its redevelopment.

The Future With the Proposed Actions ("With Action" Conditions)

Except where otherwise noted in methodologies of respective technical analyses, as described herein, most EIS analyses are performed for the analysis year, or "build year," 2031, when the Proposed Project

is anticipated to be complete and fully occupied. The future with the Proposed Actions, or "With Action" conditions, is described previously with regard to the proposed land use improvement and mixed-use project on the Project Site.

The Future Without the Proposed Actions ("No Action" Conditions)

As noted previously, EIS analyses for the Proposed Actions are performed for the 2031 build year (except where otherwise noted herein). The EIS assesses the potential for the Proposed Actions to result in significant adverse impacts by comparing conditions anticipated in 2031 with the Proposed Project fully constructed and occupied ("With Action" conditions or "Build" conditions) to conditions otherwise expected in 2031 without the Proposed Actions ("No Action" conditions or "No Build" conditions).

In the absence of the Proposed Actions, no "as-of-right" development is anticipated on the Project Site. Therefore, this EIS assumes that the physical condition of the Project Site in 2031 without the Proposed Actions generally would resemble existing conditions (e.g., conditions in 2020) but vacated (i.e., "mothballed") and hosting no activity.[5]

Accordingly, this EIS does not contemplate the potential impacts of any future reuse and/or sale of the existing BDC facilities or property that would not be part of the Project Site (e.g., the southeast corner of Lot 300 will not be part of the Project Site); rather, it is focused solely on the potential effects of the Proposed Actions. Any redevelopment of the southeastern portion of the BDC campus that may be proposed in the future would be subject to its own environmental review. This manner of consideration does not constitute impermissible segmentation pursuant to SEQRA, as independent reviews are permissible for a number of reasons:

- First, the Proposed Actions and the potential future reuse and/or sale of the remaining southeastern portion of the BDC are separate, stand-alone activities that are not components of an identifiable overall plan.
- Second, the two actions (i.e., the Proposed Actions and any potential disposition or reuse of the remaining southeastern portion of the BDC campus) are functionally independent of each other

[5] Although the BDC no longer treats or houses patients on-site, approximately 225 OPWDD workers remain on site within three buildings, two that are still used for office space and one as a power plant; however, it is anticipated that the workers within the office buildings will be relocated to facilities within the Fountain Avenue Project in Summer 2021, unrelated to the Proposed Actions. A certain number of staff will remain on site maintaining the physical plant and providing security to the site. Therefore, it is reasonable to assume that the traffic volumes generated by OPWDD administrative staff on surrounding streets would be approximately the same in the No Action conditions as in existing conditions. The Project Site itself is expected to be fully vacated and unused by 2031.

and approval of the Proposed Actions does not determine whether any such future use and/or sale of the existing facilities would go forward.

- Third, the Proposed Actions are not to be undertaken at the same time as any action on the remaining portion of the BDC campus, other than ESD's acquisition of the remaining southeastern portion of the BDC campus.

- Fourth, ESD's sale and/or reuse of the remaining southeastern portion of the BDC campus is speculative at this time, and no future plans for redevelopment have been created.

- Finally, regardless of how and by whom the remaining portion of the BDC would be used, projects at that location would be subject to separate SEQRA analysis at that time, which analysis would account for the impacts of the Proposed Actions (the proposed BDC Mixed-Use Project, which is the subject of this EIS) in the No Action conditions. Accordingly, excluding unknown potential redevelopment of this portion of Lot 300 from consideration in this EIS is no less protective of the environment.

Therefore, for the purposes of this EIS, the determination of potential impacts associated with the Proposed Actions is made through comparison of the Proposed Actions (the proposed BDC Mixed-Use Project) to the Project Site, generally in its current condition but vacated (i.e., "mothballed") and hosting no activity, plus additional off-site projects (e.g., not on the same lot as the Project Site) currently identified by the New York City Department of City Planning ("NYCDCP") Land Use and CEQR Zoning Application Portal ("ZAP") and the New York City Department of Buildings ("NYCDOB") job application permits database, as described in the methodology sections of the relevant EIS chapters.