Chapter 21: ALTERNATIVES

21.1 Introduction

According to the New York City Environmental Quality Review ("CEQR") Technical Manual, alternatives to a proposed project must be identified so that decision-makers may consider whether alternatives exist that would minimize or avoid adverse environmental effects. The selection of alternatives for a proposed project is determined by taking into account the nature of the specific project, its stated purpose and need, potential impacts, and the feasibility of potential alternatives. Alternatives selected for consideration in an Environmental Impact Statement ("EIS") generally include a No Action Alternative and alternatives that are practicable, considering the objectives and capabilities of the project sponsor, and have the potential to reduce, eliminate, or avoid significant adverse impacts of a proposed action while meeting the goals and objectives of the action.

As described in Chapter 1, “Project Description,” and explained further in Chapter 2, “Land Use, Zoning, and Public Policy,” the Proposed Actions would result in the development of 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 (neighborhood-oriented retail, supermarket, movie theater, gym, restaurant, and other commercial uses), approximately 55,384 sf of community facility space (including a senior center, One Brooklyn Health Clinic, and a community center), approximately 29,746 sf of light manufacturing space (vertical farming/agriculture, a 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 (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) by the 2031 build year.

This chapter considers the following alternatives to the Proposed Actions in comparison to the Proposed Actions themselves:

- A No Action Alternative, which assumes none of the proposed discretionary actions would occur, and the Project Site would generally resemble its current condition, except that all
Brooklyn Developmental Center (“BDC”) buildings would be vacated (i.e., “mothballed”) and host no activity.

In addition to a comparative impact analysis, the No Action Alternative is assessed to determine the extent to which it would meet the goals and objectives of the Proposed Actions’ purpose and need as defined in Chapter 1, “Project Description.”

21.2 No Action Alternative

DESCRIPTION OF THE NO ACTION ALTERNATIVE
In the absence of the Proposed Project, 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 Project would generally resemble existing conditions (e.g., conditions in 2020) but vacated (i.e., “mothballed”) and hosting no activity.¹ As described in Chapter 1, “Project Description,” 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 is not part of the Project Site).

NO ACTION ALTERNATIVE COMPARED WITH THE PROPOSED ACTIONS
The No Action Alternative has been used in other chapters of this EIS as the baseline against which impacts of the Proposed Project are measured. Following is a description of the potential effects of the No Action Alternative and a comparison to the effects of the Proposed Project:

Land Use, Zoning, and Public Policy
With the No Action Alternative, the land use conditions on the Project Site are assumed to generally resemble its current condition, except that all BDC buildings would be vacated (i.e., “mothballed”) and host no activity, as described in Chapter 1, “Project Description.” Development of the area surrounding

¹ Although the BDC no longer treats or houses patients on-site, approximately 225 Office for People With Developmental Disabilities (“OPWDD”) workers remain on site in 2021 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 Spring 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. Under the No Action Alternative, the Project Site itself is expected to be fully vacated and unused by 2031.
the Project Site would not be affected by either the No Action Alternative or the Proposed Project. As described in Chapter 2, “Land Use Zoning, and Public Policy,” development in the area around the Project Site would consist of the Fountain Avenue Land Use Improvement and Residential Project (“Fountain Avenue Project”), the Gateway Estates II residential development, the Last Mile Industrial Warehouse Project, and the Innovative Urban Village. As a result of these development projects, no undeveloped or substantially underdeveloped sites will remain within the study area in the future without the Proposed Actions, except for the Project Site and one other portion of the former BDC campus. No changes to zoning on the Project Site or within the study area are anticipated in the future without the Proposed Actions, nor are changes expected to applicable public policies.

Neither the Proposed Project, as described in Chapter 2, “Land Use, Zoning, and Public Policy,” nor the No Action Alternative would result in significant adverse impacts related to land use, zoning, and public policy on the Project Site or in the study area.

**Socioeconomic Conditions**

The No Action Alternative would not introduce new population or commercial activity to the Project Site or study area, nor would it affect any of the socioeconomic conditions of the neighborhood. As described in Chapter 3, “Socioeconomic Conditions,” the future No Action conditions in the study area would generally resemble existing conditions but for the completion of the Fountain Avenue Project, Gateway Estates II residential development, and Last Mile Industrial Warehouse Project. The Innovative Urban Village Project, which will result in a large-scale mixed-use development in Census Tract (“CT”) 1104, would be complete by 2031 but is located outside the socioeconomic study area. Similar to the future with the Proposed Actions, the No Action Alternative would not produce any socioeconomic changes that would result in significant adverse impacts, as neither the Proposed Actions nor the No Action Alternative would:

- Directly displace a residential population;
- Directly displace more than 100 employees;
- Directly displace a business that is unusually important because its products or services are uniquely dependent on its location;
- Result in substantial new development that is markedly different from existing uses, development, and activities within the neighborhood;
- Add to, or create, a retail concentration that would draw a substantial number of sales from existing businesses within the area; and
• Affect conditions within a specific industry, such that there would be significant adverse economic impacts.

Therefore, neither the Proposed Project, as described in Chapter 3, “Socioeconomic Conditions,” nor the No Action Alternative would result in significant adverse impacts related to socioeconomic conditions on the Project Site or in the study area.

Community Facilities

The No Action Alternative would not introduce new population or commercial activity to the Project Site, nor result in any direct effect to community facilities that serve the Project Site and surrounding neighborhood. Similarly, the Proposed Project, as described in Chapter 4, “Community Facilities and Services,” would not have a direct effect on any existing community facility.

As described in Chapter 4, “Community Facilities and Services,” the No Action Alternative would not result in any significant adverse indirect impacts to healthcare facilities, police or fire services, public libraries, or public schools. However, it is anticipated that in the No Action Alternative there would be shortfall in capacity in publicly funded early childhood programs as a result of new development occurring within the study area. It is anticipated that in the future without the Proposed Actions that early childhood programs in the study area would operate at a deficit of approximately 736 slots.

In the future with the Proposed Actions there would continue to be no significant adverse indirect impacts to healthcare facilities, police and fire services, intermediate schools, or high schools. However, the shortfall in capacity of publicly funded early childhood programs is projected to grow to a deficit of approximately 1,085 slots (an additional approximately 349 slots over the No Action Alternative). As described in Chapter 4, “Community Facilities and Services,” since the quantitative analysis concludes the Proposed Project is projected to result in a collective utilization rate greater than 100 percent and a utilization rate that is at least 5 percent greater than the utilization rate without the Proposed Project, a significant adverse impact to publicly funded early childhood programs could occur. In addition, since public elementary school utilization is projected to increase by approximately 13 percent over the future without the Proposed Project, exceeding the 5 percent threshold cited in the CEQR Technical Manual, and utilization is projected to be greater than 100 percent, a significant adverse impact to public elementary schools could occur. Additionally, since the Spring Creek Library catchment area population is projected to increase by approximately 9 percent in the future with the Proposed Actions, exceeding the 5 percent threshold cited in the CEQR Technical Manual, and the Proposed Project could be expected to impair the delivery of library services, a significant adverse impact to public libraries could result from the Proposed Project.
As discussed in Chapter 23, “Mitigation Measures,” required mitigation measures to address the identified significant adverse impact to publicly funded early childhood programs would be developed in consultation with the New York City Department of Education (“NYCDOE”). Such measures may include, but are not limited to, the provision of suitable space on-site for an early childhood program, provision of a suitable location off-site and within a reasonable distance, or funding or making program or physical improvements to support additional capacity. If it is deemed appropriate by the NYCDOE, the Proposed Project could include space that could be used for early childhood programming within certain building areas designated for commercial use. In this case, approximately 14,500 sf could be designated for early childhood programming. The early childhood space would be offered across two building groups (Building Groups A and E). Building Group A would provide approximately 10,000 sf of early childhood space, if deemed appropriate by the NYCDOE; the Developer would consult with the NYCDOE beginning prior to the design phase for this building group and would hold the space open for an early childhood provider tenant for six months following issuance of a temporary certificate of occupancy (“TCO”) for the building containing the offered space before leasing the space to a non-childcare tenant. Building Group E could provide approximately 4,500 sf of early childhood space, if determined necessary by the NYCDOE; the Developer would consult with the NYCDOE prior to the design phase for this building group in order to determine need and identify an early childhood provider tenant. Using an assumption of 50 square feet per slot, this 14,500 sf of space in Building Groups A and E could offer approximately 290 slots for early childhood programming, which would reduce the increase in the utilization rate resulting from the Proposed Project to less than 5 percent and thereby fully mitigate the significant adverse impact if the designated spaces are tenanted by early childhood providers in consultation with the NYCDOE. The Empire State Development (“ESD”) Environmental Controls governing the use of the Project Site would require that the Developer consult with the NYCDOE for guidance on implementing mitigation, including providing on-site space, at specific phases throughout development as described herein. As described in Chapter 24, “Unavoidable Adverse Impacts,” if mitigation measures are not fully effective in addressing the significant adverse impact to early childhood programs, then there may be a potentially unavoidable adverse impact, in which case the Proposed Project would compare less favorably with the No Action Alternative.

As discussed in Chapter 23, “Mitigation Measures,” mitigation measures to address the identified significant adverse impact to public elementary schools would be explored in consultation with the NYCDOE and New York City School Construction Authority (“SCA”). The mitigation measures would reflect the nature and scope of the elementary school impact, taking into account the assessment in Chapter 4, “Community Facilities and Services.” The NYCDOE and SCA would continue to monitor trends in demand for school seats in the area. The CEQR Technical Manual lists potential mitigation measures for public school impacts. These measures may include, but are not limited to, relocating administrative functions to another site, thereby freeing up space for classrooms; making space within the buildings in the school study area available to the NYCDOE; reprogramming existing school space.
within a district; and/or providing for new capacity (seats) by constructing a new school or an addition to an existing school. ESD will acquire and retain title to the southeast corner of the former BDC campus and hold the site in reserve for a potential new school that could be constructed there if the NYCDOE and SCA determine in the future that demand in the sub-district requires the construction of a new school at this location, at which time the new school construction would be subject to a separate New York State Environmental Quality Review Act (“SEQRA”) review. ESD would consult with the NYCDOE and SCA prior to the construction of Phase 2 concerning the need for mitigation. If it is determined at the time that mitigation is not needed, ESD would consult again with the NYCDOE and SCA prior to construction of each subsequent Project phase concerning the need for mitigation. With ESD’s land banking of the southeast corner site and the implementation of the foregoing mitigation measure, the potentially significant adverse impact on public elementary schools would be mitigated.

As discussed in Chapter 23, “Mitigation Measures,” required mitigation measures to address the identified significant adverse impact to public libraries would be developed in consultation with the Brooklyn Public Library (“BPL”). Based on a meeting held on July 13, 2021, BPL indicated the Proposed Project would increase the catchment area population and alter the demographics such that Spring Creek Library’s programming and staffing could be impaired. Mitigation measures should be targeted to alleviate the impact created and may include, but are not limited to, providing indoor/outdoor space on the Project Site to accommodate BPL programming, creating programs to accommodate new users, or alleviating staffing constraints through funding one or more new program staff positions. In addition, the Developer has committed to provide Project residents with access to low cost or free internet as well as computer lab/reading areas within the Proposed Project, a measure that BPL agreed would avoid impairment of its provision of public computer access at the Spring Creek Branch. The full range of mitigation measures would rely upon input from BPL, which would undertake ongoing monitoring to determine the appropriate mitigation measures as the Proposed Project is occupied. As well as providing internet access and computer lab/reading areas within the Proposed Project, the Developer would consult and coordinate with BPL, ESD, and New York State Homes and Community Renewal (“HCR”) beginning prior to the design of Phase 3, when the significant adverse impact to public libraries is first expected to occur, to determine the need, practicality, and feasibility for on-site space, programming, and staffing. The ESD Environmental Controls governing the use of the Project Site would require that the Developer engage in such consultation prior to the design of Phase 3. As described in Chapter 24, “Unavoidable Adverse Impacts,” if mitigation measures are not fully effective in addressing the significant adverse impact to public libraries, then there may be a potentially unavoidable significant adverse impact, in which case the Proposed Project would compare less favorably with the No Action Alternative.
Open Space

The No Action Alternative would not introduce any new publicly accessible open space, nor directly affect any existing or otherwise planned open space, nor would it introduce new users of area open space resources. With the No Action Alternative, approximately 3.48 acres of publicly accessible open space would be introduced to the study area in the form of two open spaces that will be developed as part of the Gateway Estates II residential development and a third open space, Schroeders Walk, which will be part of the Fountain Avenue Project. In the No Action Alternative, the passive open space ratio for the ¼-mile worker study area would be approximately 17.9 acres per 1,000 combined workers and residents, which is well above the planning guideline of 0.15 acres of passive open space per 1,000 non-residents; the overall open space ratio for the ½-mile residential study area would be approximately 15.5 acres per 1,000 combined workers and residents, which is well above the planning guideline of 2.5 acres of combined active and passive open space per 1,000 residents; the passive open space ratio for the ½-mile residential study area would be approximately 8.9 acres per 1,000 combined workers and residents, which is well above the planning guideline of 0.5 acres of passive open space per 1,000 residents; and the active open space ratio for the ½-mile residential study area would be approximately 6.6 acres per 1,000 combined workers and residents, which is well above the planning guideline of 2.0 acres active open space per 1,000 residents, as specified in the CEQR Technical Manual. Therefore, neither the Proposed Project, as described in Chapter 5, “Open Space,” nor the No Action Alternative would result in significant adverse impacts related to open space on the Project Site or in the study area.

Shadows

With the No Action Alternative, there would be no new development on the Project Site and, therefore, no potential for new shadow increments on nearby sunlight-sensitive resources. Therefore, neither the Proposed Project, as described in Chapter 6, “Shadows,” nor the No Action Alternative would result in significant adverse impacts related to shadows on the Project Site or in the study area.

Historic and Cultural Resources

The Project Site and study area do not contain known historic resources, although the Project Site is located within an “archaeologically sensitive area,” as described in Chapter 7, “Historic and Cultural Resources.” The No Action Alternative would require no new construction on the Project Site, and therefore no excavation that could potentially affect archaeological resources. Therefore, neither the Proposed Project, as described in Chapter 7, “Historic and Cultural Resources,” nor the No Action Alternative would result in significant adverse impacts related to historic and cultural resources.
Urban Design and Visual Resources

With the No Action Alternative, as described in Chapter 8, “Urban Design and Visual Resources,” the Fountain Avenue Project will be completed in the future without the Proposed Actions, the effect of which in the study area will be the completion of the mixed-use streetscapes directly north of and southwest of the Project Site. The existing street pattern will be unchanged and the portion of the former BDC campus that comprises the Project Site would be unoccupied and inaccessible to the public, with the existing buildings and perimeter wall remaining. It can be expected that the portions of the Gateway Estates II residential development project that are currently under construction within the study area would resemble the already constructed portions both inside and outside the study area. In addition, the Fountain Avenue Project will include a new approximately 1-acre pedestrian thoroughfare north of the Project Site, which is to be developed as an urban park area with landscaping, benches, and possibly playground equipment. Thus, in the No Action Alternative, the urban design of the area will be improved, and there will be no significant adverse impacts to urban design or visual resources, although the Project Site would remain in its current condition.

As described in Chapter 8, “Urban Design and Visual Resources,” the Proposed Project likewise would not result in significant adverse impacts to urban design or visual resources but would contribute in a positive manner to the urban design of the area. The Proposed Project would result in the redevelopment of the Project Site in a manner consistent with the urban design of the portions of the former BDC campus already under development adjacent to the Project Site. It is expected that the combination of ground-floor commercial uses, the street tree plantings, concordant sidewalk improvements surrounding the Project Site (as would be required with the construction of new sidewalks, following on-site construction), and the introduction of publicly accessible open space would contribute to the attractiveness of the streetscapes that have already been partly improved through landscaping on surrounding properties as part of the Fresh Creek Urban Renewal Plan (“FCURP”) implementation. These positive contributions would result in an improved streetscape condition and pedestrian experience on all streets surrounding the Project Site. Therefore, although neither the Proposed Project, as described in Chapter 8, “Urban Design and Visual Resources,” nor the No Action Alternative would result in significant adverse impacts related to urban design and visual resources, the pedestrian experience would be more enhanced with the Proposed Project than with the No Action Alternative, and the new development on the Project Site would be consistent with the urban design of the study area.

Natural Resources

As described in Chapter 9, “Natural Resources,” no significant natural resources are present on the Project Site, which is comprised of an institutional campus with several buildings, paved walkways, maintained lawn, driveways, and surface parking areas. In the No Action Alternative, Project Site
conditions are expected to remain unchanged, and conditions of natural resources in the vicinity are anticipated generally to resemble existing conditions. Therefore, neither the Proposed Project as described in Chapter 9, “Natural Resources,” nor the No Action Alternative would result in significant adverse impacts related to natural resources on the Project Site or in the study area.

**Hazardous Materials**

With the No Action Alternative, no new construction or excavation of landfill or natural soils would occur on the Project Site. The Project Site would not be developed or utilized, and no increased exposure to on-site environmental conditions would be expected in the No Action Alternative. By comparison, the Proposed Project would result in construction activities on the Project Site, where unidentified or potential contaminated materials may be encountered during construction, as discussed in Chapter 10, “Hazardous Materials.” As outlined in Chapter 10, based on the results of the Phase II ESI, vapor intrusion mitigation measures are warranted to address the potential for soil vapor intrusion in the proposed buildings. The ESD Environmental Controls prepared as part of the Proposed Project, would require implementation of vapor mitigation measures, as required, to eliminate the potential for exposure of building occupants to contaminants. In addition, contaminants in soil and groundwater detected in the Phase II ESI warrant precautions to prevent exposure of the public, construction workers and future Project Site occupants to contamination. The ESD Environmental Controls would require the preparation of a Remedial Action Plan (“RAP”) and Construction Health and Safety Plan (“CHASP”) to be accepted by ESD and HCR prior to the commencement of construction. Therefore, neither the Proposed Project, as described in Chapter 10, “Hazardous Materials,” nor the No Action Alternative would result in significant adverse impacts related to hazardous materials on the Project Site or in the study area.

**Water and Sewer Infrastructure**

With the No Action Alternative, there would be no changes to the Project Site, which would remain in its substantially underdeveloped condition, with stormwater runoff conditions the same as for existing conditions (and conditions in the future without the Proposed Actions) described in Chapter 11, “Water and Sewer Infrastructure.” Similarly, there would be no sanitary water usage at the Project Site in the No Action Alternative. In the future with the Proposed Actions, there would be an increase in sanitary sewer usage and changes to the stormwater runoff conditions, compared to the No Action Alternative, as the Proposed Project would introduce new residents and occupants to the Project Site and also substantially increase the impermeable surfaces on the Project Site. However, as described in Chapter 11, the Proposed Project would conform to New York City Department of Environmental Protection (“NYCDEP”)-approved master planning for management of sanitary and storm sewer infrastructure connecting the Project Site to the existing water and sewer infrastructure that serves the Project Site. Therefore, neither the Proposed Project, as described in Chapter 11, “Water and Sewer Infrastructure,”
nor the No Action Alternative would result in significant adverse impacts related to water and sewer infrastructure on the Project Site or in the study area.

**Solid Waste and Sanitation Services**

With the No Action Alternative, there would be no changes to the Project Site, and so no solid waste would be generated on the Project Site in this alternative; therefore, there would be no significant adverse impact related to solid waste and sanitation services. The Proposed Project is projected to generate approximately 93 tons per week of solid waste. Approximately 64.6 tons of solid waste would be attributable to the City’s anticipated future waste generation handled by DSNY and is projected to generate solid waste equivalent to approximately five truckloads per week. This increase is not expected to overburden the DSNY’s solid waste handling services. Approximately 28.4 tons of solid waste would be attributable to the commercial and light manufacturing development and would be handled by private carters. This would represent approximately 0.04 percent of the City’s anticipated future commercial waste generation and would require approximately two additional collection trucks per week compared to the No-Action condition. There are more than 2,000 private carting businesses authorized to serve New York City, and it is expected that their collection fleets would be sufficiently flexible to accommodate this increased demand for solid waste collection. Therefore, neither the Proposed Project, as described in Chapter 12, “Solid Waste and Sanitation Services,” nor the No Action Alternative would result in significant adverse impacts related to solid waste and sanitation services.

**Energy**

With the No Action Alternative, there would be no new energy demand associated with the Project Site, and so there would be no significant adverse impact with regard to energy. By comparison, as described in Chapter 13, “Energy,” the Proposed Project would be expected to result in a total operational energy consumption of approximately 381.8 billion British Thermal Units (“BTUs”) annually, which would not overburden energy supply systems or result in a significant adverse impact. Therefore, neither the Proposed Project, as described in Chapter 13, “Energy,” nor the No Action Alternative would result in significant adverse impacts related to energy.

**Transportation**

**Traffic**

As discussed in Chapter 14, “Transportation,” traffic volumes in the future without the Proposed Actions (No Action Alternative) are established by applying a background traffic growth rate to the modeled existing traffic, and then adding vehicular volumes expected to be generated by elements of the
Gateway Estates II residential development, the Fountain Avenue Project, the Innovative Urban Village Project, and the Last Mile Industrial Warehouse Project (554 and 578 Cozine Avenue Warehouse Development). The analyses show that the majority of the intersections in the study area would operate at acceptable levels during the weekday AM, midday, PM, and Saturday midday peak analysis hours under the No Action Alternative – with overall operations at level of service (“LOS”) C or better. An operational change at the intersection of Jerome Street and Flatlands Avenue, which is expected in the No Action Alternative, would improve the LOS from the existing conditions. However, the following movements would operate with some congestion:

- The westbound Seaview Avenue left-turn movement at Erskine Street would operate at LOS E conditions during the weekday AM, midday, and Saturday midday peak hours. This movement would operate at LOS F during the weekday PM peak hour.

- At the intersection of Linden Boulevard and Fountain/Loring Avenues, the westbound Linden Boulevard left-turn movement would operate at LOS E during all four analysis periods and the eastbound Linden Boulevard left turn would operate at LOS E during the weekday AM, midday, and PM peak periods. The southbound Fountain Avenue approach would operate at LOS F during the weekday PM peak hour.

- The northbound Elton Street approach at Flatlands Avenue would operate at LOS E during the weekday AM and PM peak hours.

- Absent mitigation, traffic conditions at the intersections of Flatlands Avenue and Pennsylvania Avenue would worsen due to the additional trips generated by the Innovative Urban Village Project. Specifically, the northbound Pennsylvania Avenue left-turn movement would operate at LOS F during the weekday AM, PM, and Saturday midday peak hours. The southbound Pennsylvania Avenue left turn would operate at LOS F in the Saturday midday peak hour and the southbound right-turn movement would operate at LOS E during the weekday PM and Saturday midday peak hours. The Flatlands Avenue eastbound left-turn movement would operate at LOS F during the weekday AM and midday peak hours and operate at LOS E during the weekday PM and Saturday midday peak hours. The Flatlands Avenue eastbound left-turn movement would operate at LOS E during the weekday AM peak hour.

- The northbound Erskine Street left turn at the North Gateway Drive would operate at LOS F during the Saturday midday peak hour.

- The eastbound Flatlands right-turn movement at Jerome Street would operate at LOS F during the Saturday midday peak hour. Despite the geometric improvements proposed at this future intersection based on the Gateway Estates II FEIS, the volume of right-turn movements would exceed the capacity of a single right-turn lane. The existing eastbound Flatlands Avenue right-
turn volume at Schenck Avenue and the southbound Schenck Avenue through movement at Flatlands Avenue were reassigned to the eastbound Flatlands Avenue right turn at Jerome Street. For the purpose of this study, a continuous right-turn movement was assumed to be provided for this approach, which would require removing the west crosswalk. New York City Department of Transportation (“NYCDOT”) coordination with the Gateway Estates II residential development should occur when this intersection is reconfigured to appropriately design the intersection to accommodate No Action traffic volume demands.

As described in Chapter 14, “Transportation,” the traffic impact analysis indicates the potential for significant adverse impacts at ten intersections during one or more analyzed peak hours with the Proposed Project. The highway analysis indicates the potential for a significant adverse impact for the westbound Belt Parkway weaving segment between Erskine Street and Pennsylvania Avenue. While the Proposed Project would result in significant adverse impacts, many of which could be mitigated as described in Chapter 23, “Mitigation Measures,” the No Action Alternative would not result in any significant adverse traffic impacts.

Transit
In the No Action Alternative, demand on the local bus services operating in the vicinity of the study area is expected to increase during the 2019 through 2031 period as a result of background growth and incremental bus trips associated with the Fountain Avenue Project, Gateway Estates II residential development, and the Innovative Urban Village Project. The study area is served by a total of four Metropolitan Transportation Authority (“MTA”) local bus routes—the B13, B83, and B84, operated by New York City Transit (“NYCT”), and the Q8, operated by MTA Bus.

In the No Action Alternative, as described in Chapter 14, “Transportation,” existing levels of bus service will not be sufficient to provide adequate supply to meet the projected demand on the northbound B13 in the weekday AM and Saturday midday; southbound B13 in the AM, weekday PM, and Saturday midday; northbound B83 in the weekday AM, weekday PM, and Saturday midday; southbound B83 in the weekday PM and Saturday midday; and the eastbound Q8 in the weekday AM. As a general policy, the MTA (NYCT and MTA Bus) provides additional bus service where demand warrants, taking into account financial and operational constraints. Therefore, it is anticipated that MTA Bus would increase service frequency on the B13, B83, and Q8 routes to address potential capacity shortfalls during the peak hours.

Based on projected levels of bus service in the No Action Alternative in combination with bus trips that the Proposed Project is expected to generate, in the future with the Proposed Actions there would be a capacity shortfall for the B13, B83, and Q8 bus routes during the weekday AM, PM, and Saturday midday peak hours. As a result, each of the bus routes would experience a significant adverse impact based on CEQR Technical Manual criteria, except for the westbound Q8 during the AM peak hour, and the
eastbound Q8 during the PM peak hour. As discussed in Chapter 23, “Mitigation Measures,” the significant adverse impact to these bus services could be mitigated by increasing the number of buses in the peak hours. The general policy of the MTA is to provide additional bus service where demand warrants, taking into account financial and operational constraints.

In the No Action Alternative, as described in Chapter 14, “Transportation,” demand at the Euclid Avenue Station is expected to increase as a result of background growth and incremental trips associated with No Action developments including: the East New York Rezoning, Gateway Estates II residential development, and other proposed No Action developments identified in the East New York Rezoning EIS. As listed in Tables 14-19, “No Action Stair Analysis at Euclid Avenue Subway Station,” and 14-20, “No Action Fare Array Analysis at Euclid Avenue Subway Station,” the analyzed stairs and fare array at this station would continue to operate at an acceptable LOS C or better in both peak hours, except for platform stair P6, which would worsen from LOS C to D conditions.

In the future with the Proposed Project, the highest number of peak hour subway trips are expected to occur at the Euclid Avenue station on the A and C line, which would experience approximately 497 incremental trips (in and out combined) during the AM peak hour and approximately 502 during the PM peak hour. This increment results in a significant adverse impact to platform stair P6 during the AM peak hour as the stair would exceed the significant impact threshold. As discussed in Chapter 23, “Mitigation Measures,” in order to assess this condition, a Transit Monitoring Plan would be developed in coordination with NYCT to collect future station passenger counts and perform stair analyses at the Euclid Avenue Manhattan bound platform stairs to determine if station mitigation is needed and, if yes, identify the appropriate mitigation. If data collected as part of the monitoring program leads to the conclusion that a significant impact could occur, the Developer would consult and coordinate with NYCT, ESD and HCR to determine the extent that potential mitigation improvements are practicable and feasible. If stair widening is deemed impractical or infeasible, other mitigation options could be considered, but it is possible that the impact to stair P6 would remain unmitigated. However, affected passengers would have the option to use stairs P4 or P2 as an alternative.

Regarding Subway Line Haul, in the No Action Alternative, the A, C, and 3 lines would all continue to operate below the guideline capacity in the peak direction at the maximum load point during the weekday peak hours and the A and C lines would operate over guideline capacity during the Saturday midday peak hour.

In the future with the Proposed Project, all subway lines would continue to operate below the guideline capacity in the peak direction at the maximum load point during the weekday peak hours; therefore, significant adverse impacts to subway line haul conditions are not anticipated based on CEQR Technical Manual criteria during these weekday time periods. The A and C lines would operate over guideline capacity during the Saturday midday peak hour; however, this would not be considered a significant
impact as the Proposed Project is expected to generate an incremental increase averaging three or fewer riders per subway car. This is based on the general assumption that when subways are at or above practical capacity, the addition of even five or more riders per car is perceptible. A passenger volume addition of less than five riders per car is not perceptible and is not considered a significant impact.

Thus, if the mitigation measures proposed as part of the Proposed Project are effective, then there would be no significant difference in effects to transit services with either the Proposed Project or the No Action Alternative. However, as discussed in Chapter 24, “Unavoidable Adverse Impacts,” were the mitigation measures for the capacity shortfall on B13, B83, and Q8 bus lines, and subway station stair impact at the Euclid Avenue Subway Station P6 platform stair proposed as part of the Proposed Project not provided by MTA or deemed infeasible, then the Proposed Project may result in unavoidable adverse impacts, in which case the Proposed Project may compare less favorably with the No Action Alternative.

Pedestrians
In the No Action Alternative, pedestrian volumes along analyzed sidewalks, crosswalks, and corner areas are expected to increase during the 2019 through 2031 period as a result of background growth, as well as demand from the adjacent Fountain Avenue Project. The analysis shows that nearly all pedestrian elements would continue to operate at an acceptable LOS C or better except for the east crosswalk at Vandalia Avenue and Erskine Street, which would operate at LOS D due to an increase in pedestrian volumes associated with the Fountain Avenue Project. The Proposed Project would create three new public streets through the Project Site: North Street, South Street, and Field Drive. All internal BDC mixed-use project sidewalks would operate at an acceptable LOS condition if a minimum effective sidewalk clear width of five feet is provided (i.e., a minimum unobstructed sidewalk clear width of eight feet as per the NYCDOT Street Design Manual), as pedestrian volumes for all other elements would be lower than this internal site analysis location. The Proposed Project would generate an increased number of pedestrian trips, with overall operations at LOS C or better. One exception is the intersection of Erskine Street and Vandalia Avenue where the east crosswalk would deteriorate to LOS E during the weekday midday peak hour and to LOS D during the weekday PM and Saturday midday peak hours. The south crosswalk would deteriorate to LOS D during the weekday midday peak hour. These elements would experience a significant adverse traffic impact based on a deteriorating LOS as compared to the No Action conditions. However, Chapter 23, “Mitigation Measures,” identifies that widening the east crosswalk by four feet to a total width of 14’-3” and widening the south crosswalk by 2’-8” to a total width of 15 feet would mitigate the impact for both crosswalks during all affected peak hours. Thus, if the mitigation measures proposed as part of the Proposed Project are effective, then there would be no significant difference in effects to pedestrians with either the Proposed Project or the No Action Alternative.
Parking

In the No Action Alternative, the supply of on-street parking spaces in the 2031 No Action Conditions would have an available capacity of approximately 14 percent (approximately 156 spaces) during the weekday early morning hours, and an available capacity between approximately 25 and 27 percent during the weekday midday and Saturday midday periods. As described in Chapter 14, “Transportation,” approximately 853 on-site parking spaces would be provided under the Proposed Project, of which approximately 291 spaces would be dedicated for residents, approximately 499 would be dedicated for the other development land uses, and the remaining 63 spaces would be on-street spaces provided on the new public streets that would be available to any user. The 2,317 residential dwelling units (“DU”) are projected to generate a residential parking demand of 719 vehicles at a household vehicle ownership rate of 0.31 vehicles per household, based on US Census data of a representative census tract. This would result in a parking shortfall of 428 parking spaces, given that the development would only provide a total of 291 residential parking spaces. The supply of available on-street parking spaces (including the new 63 on-street parking spaces to be provided by the Project) would be able to accommodate the Project’s on-street parking demand during the weekday AM, midday, and Saturday midday peak periods. Therefore, neither the Proposed Project, nor the No Action Alternative would result in significant adverse impacts related to parking.

Air Quality

The No Action Alternative would not introduce new residents or visitors to the Project Site, nor would it result in activities that would alter the air quality conditions associated with stationary or mobile sources. Therefore, the No Action Alternative would not result in any significant adverse air quality impacts. As described in Chapter 15, “Air Quality,” the Proposed Project would not result in a violation of the National Ambient Air Quality Standards (“NAAQS”) for carbon monoxide (“CO”), and so there would be no significant adverse impacts to air quality attributable to mobile sources with the Proposed Project.

The stationary source analysis prepared for the Proposed Project, as presented in Chapter 15, “Air Quality,” concludes that, with some restrictions on stack placement and a requirement that any fossil fuel-fired heating or hot water equipment use natural gas (which would be set forth in the ESD Environmental Controls), Proposed Project pollutant emissions of nitrogen dioxide (“NO₂”), sulfur dioxide (“SO₂”), particulate matter less than 2.5 microns in diameter (“PM₂.₅”) and particulate matter less than 10 microns in diameter (“PM₁₀”) related to the use of natural gas for heating, ventilation, and air conditioning (“HVAC”) systems would not result in any violations of applicable NAAQS or exceed the NYCDep / New York State Department of Environmental Conservation (“NYSDEC”) de minimis impact criteria. By comparison, there would be no significant adverse impacts associated with the No Action Alternative (which would not require any new HVAC systems on the Project Site).
Finally, no existing industrial or air toxics facilities were identified within the study area. Therefore the Proposed Project would not result in impacts to any sensitive land uses regarding air toxics, nor is it anticipated that malodorous emissions related to the Spring Creek Waste Water Treatment Plant (“WWTP”) (Auxiliary 26th Ward) or Building I of the Proposed Project would result in significant adverse impacts with the Proposed Project; thus, by comparison, there would be no significant adverse impacts associated with the No Action Alternative (which would not introduce sensitive land uses to the Project Site). Therefore, neither the Proposed Project, as described in Chapter 15, “Air Quality,” nor the No Action Alternative would result in any significant adverse impacts related to air quality.

**Greenhouse Gas Emissions and Climate Change**

In the No Action Alternative, there would be no use of energy for buildings or vehicle trips (associated with the No Action Alternative). Therefore, the No Action Alternative would not affect greenhouse gas emissions in the City nor be inconsistent with the City’s greenhouse gas reduction goal applicable to the actions. Pursuant to the guidelines of the CEQR Technical Manual, the analysis of the Proposed Project seeks to identify the total emissions associated with a proposed action and analyze its consistency with the City’s greenhouse gas reduction goal by analyzing design and efficiency measures. As described in Chapter 16, “Greenhouse Gas Emissions,” the Proposed Project would be consistent with the goals of encouraging construction of resource- and energy-efficient buildings and encouraging development that is reliant upon public transit. Additionally, the Proposed Project is designed to account for future sea level rise conditions as provided in 6 NYCRR Part 490. As such, it would be consistent with the New York City Department of City Planning’s (“NYCDCP”) Waterfront Revitalization Program (“WRP”), the New York State Department of State’s (“NYSDOS”) Coastal Management Program, and NYSDEC’s guidance under the Community Risk and Resiliency Act, making it designed to be resilient to climate change. Therefore, neither the Proposed Project, as described in Chapter 16, “Greenhouse Gas Emissions,” nor the No Action Alternative would result in significant adverse impacts related to greenhouse gas emissions and climate change.

**Noise**

The No Action Alternative would not introduce stationary or mobile sources of noise to the Project Site, nor would it introduce sensitive land uses to the Project Site. In comparison, as described in Chapter 17, “Noise,” the greatest difference in noise level conditions between the No Action Alternative (represented in Chapter 17, “Noise,” as the future No Action condition) and the future with the Proposed Actions is predicted to be approximately 2.9 decibels (“dB”), which is just below the three decibel CEQR Technical Manual threshold for significance. In addition, loud stationary noise sources are not identified within the study area, and all project-related mechanical systems would adhere to the requirements contained in the New York City Noise Code. The ESD Environmental Controls would
include project requirements in the form of window wall attenuation to ensure interior noise levels suitable for residential, commercial and community facility uses (for more information, refer to Chapter 17, “Noise”). Therefore, with these requirements in place, neither the Proposed Project, as described in Chapter 17, “Noise,” nor the No Action Alternative would result in significant adverse impacts related to noise.

Public Health

The No Action Alternative would result in no changes to the Project Site or surrounding area that would potentially result in impacts to public health. In comparison, as described in Chapter 18, “Public Health,” the Proposed Project would introduce new population to the Project Site and new activities that could affect air quality, sanitation and water resources, hazardous materials, and noise; the Proposed Project would result in no significant adverse impacts to air quality, water quality, hazardous materials, or noise; a significant adverse impact related to construction noise has been identified, but would be temporary, and is not anticipated to create a significant adverse public health impact. Therefore, neither the Proposed Project, as described in Chapter 18, “Public Health,” nor the No Action Alternative would result in significant adverse impacts related to public health.

Neighborhood Character

The No Action Alternative would not affect any aspect of neighborhood character; rather, as described in Chapter 19, “Neighborhood Character,” the future neighborhood character conditions in the future without the Proposed Actions (representing the No Action Alternative) would be largely determined by the completion of the Gateway Estates II residential development and the Fountain Avenue Project. As described in Chapter 19, “Neighborhood Character,” the Proposed Project would result in no significant adverse impacts related to land use and open space, urban design and visual resources, historic and cultural resources, socioeconomic conditions, pedestrian safety or noise. To the extent that significant adverse traffic impacts may result in an increased delay at certain signalized intersections in the area, four of the ten intersections identified could be fully mitigated; six could remain unmitigated. For transit, a significant adverse impact (subway user congestion) has been identified during the AM peak hour to one stair serving the Euclid Avenue subway station (A and C lines): platform stair P6. This impact conceptually could be fully mitigated through stair widening, which will be subject to consultation between the Developer and ESD, NYCT, and HCR. If the stair widening is determined to be infeasible or impractical, it will remain unmitigated, although passenger demand could be accommodated at other stairways serving the same platform. As described in Chapter 23, “Mitigation Measures,” significant adverse impacts to MTA bus routes could be fully mitigated if MTA and its operating entities (NYCT and MTA Bus) decide that it is feasible to do so by increasing bus service. Construction activities would result in temporary impacts related to parking, traffic, buses, and noise. Overall, the Proposed Project
would not significantly adversely affect neighborhood character. Rather, as described in Chapter 1, “Project Description,” the Proposed Project would meet the important objectives of the Vital Brooklyn program, through the provision of affordable housing and healthcare opportunities at the Project Site. As described in Chapter 2, “Land Use, Zoning and Public Policy,” the Proposed Project would effectuate the FCURP, through the development of the Project Site in a manner that, as described in Chapter 8, “Urban Design and Visual Resources,” would result in a combination of ground-floor commercial uses, street tree plantings, concordant sidewalk improvements surrounding the Project Site, and the introduction of publicly accessible open space. These urban design improvements would result in an improved streetscape condition and pedestrian experience on all streets surrounding the Project Site, and the new development on the Project Site would be consistent with the urban design of the study area. Therefore, neither the Proposed Project, as described in Chapter 19, “Neighborhood Character,” nor the No Action Alternative would result in significant adverse impacts related to neighborhood character.

Construction
The No Action Alternative would require no construction or excavation on the Project Site; therefore, there would be no associated construction-period impacts. As described in Chapter 20, “Construction,” the Proposed Project would not result in significant adverse construction-period impacts related to pedestrians, air quality, historic and cultural resources, hazardous materials, or natural resources. However, construction activities associated with the Project could result in significant adverse impacts related to traffic, transit, and noise, and there will be a parking shortfall during portions of the construction period, as described below. Construction activities associated with the Proposed Project would also be expected to result in construction-period impacts related to noise, though of limited duration and limited to the extent practicable through scheduling of activities and use of best practices, as described in Chapter 20.

As described in Chapter 20, “Construction,” construction-related traffic in combination with occupancy of some Proposed Project buildings would have significant adverse impacts at two intersections during the 6-7 AM and 3-4 PM construction peak hours. Implementation of standard traffic improvement measures would mitigate the anticipated traffic impacts at one intersection. Traffic impacts at the second intersection could not be mitigated and would remain unmitigated. Implementation of the recommended traffic engineering improvements is subject to review and approval by NYCDOT. As discussed in Chapter 24, “Unavoidable Adverse Impacts,” to the extent that mitigation measures proposed as part of the Proposed Actions may not be effective at fully mitigating the construction-period traffic impacts, then unavoidable adverse impacts during the construction periods may result.

As described in Chapter 20, “Construction,” the Proposed Project’s significant adverse bus impact would also be less likely to occur during construction than with full build-out of the Proposed Project in 2031.
As incremental demand would be lower during construction and would mostly not occur during the peak hours of commuter demand. It is expected that the mitigation measures identified for 2031 operational transit impacts in Chapter 23, “Mitigation Measures,” namely addition of buses to the affected routes, would also be effective at mitigating any potential impacts from construction transit trips during the 2027 (Q2) construction periods.

As described in Chapter 20, “Construction,” during construction periods, approximately 90 parking spaces would be located on portions of the site that are not under construction and/or on the southeast corner of the Project Site, which is owned by the State. However, even with the provision of these parking spaces, the Proposed Project would result in a construction-related parking shortfall. In the absence of these parking measures, construction workers experiencing a parking shortfall may search beyond the typical ¼-mile walk radius from the Proposed Project, which likely would result in construction workers searching for available on-street parking spaces within the industrial neighborhood north of Flatlands Avenue.

As explained in Chapter 20, “Construction,” significant adverse impacts related to noise would occur during certain times of construction activity and with use of certain equipment. With the implementation of noise mitigation measures (per the New York City Noise Code and the ESD Environmental Controls) to reduce noise levels during construction activities, the potential for significant adverse impacts related to noise would be reduced, though not entirely eliminated; there would remain the likely potential for temporary significant adverse construction-period noise impacts on neighboring residential buildings. As discussed in Chapter 24, “Unavoidable Adverse Impacts,” to the extent that mitigation measures proposed as part of the Proposed Actions may not be effective at fully mitigating the construction-period noise impacts, then unavoidable adverse impacts related to noise that would be of limited duration but significant in magnitude may result.

Therefore, in summary, significant adverse impacts related to noise, traffic, and bus ridership, and a parking shortfall would occur with the Proposed Project during construction but would not occur with the No Action Alternative.

With the project requirements in place per the ESD Environmental Controls, as well as other mitigation measures in place, the potential for significant adverse impacts related to traffic, bus ridership, and noise would be minimized with the Proposed Project, though not entirely eliminated. Given the potential for significant adverse construction-period traffic, transit (bus), pedestrian and noise impacts, the Proposed Project compares less favorably to the No Action Alternative with respect to construction-related environmental impacts.
NO ACTION ALTERNATIVE SUPPORT OF PURPOSE AND NEED

The No Action Alternative would not meet the goals and objectives of the Proposed Actions’ purpose and need, as defined in Chapter 1, “Project Description.” 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 property 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. Therefore, while the No Action Alternative would not result in the Proposed Project’s potential significant adverse impacts related to public elementary schools, publicly funded early childhood programming, public library programming, traffic, pedestrians, buses, one subway platform stair, construction traffic and bus service, construction noise, or construction period parking shortfall, and would, like the Proposed Project, not result in any other significant adverse environmental impacts, the No Action Alternative would also not achieve the goals and objectives of the Proposed Project. 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.