

Chapter 21: ALTERNATIVES

21.1 Introduction

According to the *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 EIS generally include a No Action Alternative and alternatives that are feasible, 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 some or all of 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 action would result in approximately 1,169 units of affordable housing and up to approximately 122,500 sf of commercial space on the project site.

This chapter considers the following alternatives to the proposed action in comparison to the proposed action, itself:

- A No Action Alternative, which assumes none of the proposed discretionary actions would occur, and the project site would continue to remain primarily unoccupied.

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 action, which include:

- The construction of affordable housing, including affordable senior housing and housing accommodating people with intellectual and developmental disabilities, in a significantly underserved portion of Brooklyn;
- The beneficial reuse of primarily undeveloped acreage; and
- The divestment of surplus State property, and realization of revenue to the State through proceeds of the sale and future property taxes.

21.2 No Action Alternative

DESCRIPTION OF THE NO ACTION ALTERNATIVE

The No Action Alternative assumes that the project site would not be transferred from Dormitory Authority of the State of New York (“DASNY”) to Empire State Development (“ESD”), or sold by ESD to a conditionally designated developer. As such, there would be no zoning overrides, General Project Plan (“GPP”), or other discretionary actions, and the proposed action would not be implemented.

In the absence of the proposed action, no “as-of-right” development is anticipated on the project site or on the remainder of the block comprising the Brooklyn Developmental Center (“BDC”). There are currently no plans in place for disposition of the remaining BDC property (Lot 300) or for other use of it.

NO ACTION ALTERNATIVE COMPARED WITH THE PROPOSED ACTION

The No Action Alternative has been used in other chapters of this EIS as the baseline against which impacts of the proposed action are measured. Following is a description of the potential effects of the No Action Alternative and a comparison to the effects of the proposed action:

Land Use, Zoning, and Public Policy

With the No Action Alternative, the land use conditions on the project site would resemble existing conditions; specifically, the two proposed parcels A and B would remain in their current, largely undeveloped state.

Development of the area surrounding the project site would not be affected by either the No Action Alternative or the proposed action. As described in Chapter 1, “Project Description,” Office for People with Developmental Disabilities (“OPWDD”) administrative functions are anticipated to continue on the adjacent BDC property (Lot 300). With the Gateway Estates development complete (estimated completion is 2018), the Fresh Creek Urban Renewal Plan (“FCURP”) will have been fully implemented, and consequently, no undeveloped or substantially underdeveloped sites will remain within the study area, except for the project site and portions of designated parkland (Spring Creek Park). As described in Chapter 5, “Open Space,” the portion of Spring Creek Park located directly south of the project site, south of Seaview Avenue, is expected to be developed into a publicly accessible open space area as part of the Gateway Estates development currently underway. No changes to zoning on the project site or within the study area are anticipated in the future without the proposed action, nor are changes expected to applicable public policies.

Neither the proposed action, 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 conditions in the study area would be similar either in the future without the proposed action (the No Action Alternative) or with the proposed action. The Gateway Estates development represents the only notable project in the study area with either alternative. With the Gateway Estates development, the FCURP will be fully realized, leaving no substantial undeveloped or underdeveloped property in the study area. Similar to the proposed action, the No Action Alternative would not result in any socioeconomic changes that would result in significant adverse impacts, as neither the proposed action 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 amount 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 action, 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 action, 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 introduction of new population to the project site as part of the proposed action would not result in any significant adverse impacts associated with health care facilities, police and fire services, or libraries. Similarly, the No Action Condition, which includes consideration of the City’s East New York Rezoning proposal, would not result in significant adverse impacts to health care facilities, police and fire services, libraries, or to public schools in the study area. The *East New York Rezoning Proposal Final Environmental Impact Statement (“FEIS”)*¹ concluded that the East New York Rezoning proposal would result in significant adverse impacts to public schools in Community School District (“CSD”) 19, Sub-District 2; however, the proposed action is located in CSD 19, Sub-District 3. Neither the proposed action nor the No Action Alternative, which would not add any incremental demand for school seats, would result in significant adverse impacts to public schools in CSD 19, Sub-District 3.

The publicly funded child care facilities in the No Action Alternative are expected to be at or near full utilization as a result of existing use combined with demand projected to arise from the East New York Rezoning proposal. The No Action Alternative would not add any incremental demand for publicly funded child care; however, as described in Chapter 4, “Community Facilities and Services,” child care facilities serving the project site may experience a significant adverse indirect impact resulting from the East New York Rezoning proposal, if mitigation measures proposed as part of that action (as described in the *East New York Rezoning Proposal FEIS*) are not fully effective. As described in Chapter 4, the proposed action would add approximately 173 children potentially eligible for subsidized child care to the publicly-funded group child care and Head Start centers in the study area, which would exacerbate the shortfall in available capacity and result in a significant adverse indirect impact to child care facilities.

However, as discussed in Chapter 1, “Project Description,” and Chapter 23, “Mitigation Measures,” the proposed action would include space that could be used for child care facilities within the building area designated for commercial use. The Restrictive Declaration governing the use of the project site would require that the developer, prior to the occupancy of Phase 1, consult with New York City Administration for Children’s Services (“NYCACS”) on the appropriate use of this space to mitigate the impact of eligible children anticipated to be generated by the proposed action. This could include making the space available for purchase or rental by a NYCACS contractor providing publicly funded day care, or by a private day care provider that accepts NYCACS vouchers. If requested by NYCACS, the developer would fund a number of vouchers equal to the number of children residing on the project site attending private day care in the dedicated space or other facilities that NYCACS may identify. If the mitigation measures proposed as part of the proposed action is effective (i.e., accommodates the full demand introduced by the proposed action), then there would be no difference in effect to child care facilities with either the proposed action or the No Action Alternative. However, as discussed in Chapter 24, “Unavoidable Adverse Impacts,” should NYCACS fail to identify mitigation measures that would fully address project-generated demand, then the proposed action may result in unavoidable significant

¹ *East New York Rezoning Proposal FEIS*; New York City Planning Commission, Lead Agency; February 12, 2016.

adverse impacts to child care, in which case the proposed action would compare less favorably with the No Action Alternative.

Open Space

The No Action Alternative would not introduce any new public 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, only the nearby Gateway Estates development would affect open space resources, both directly through the creation of new parkland and indirectly through the introduction of new users. The Gateway Estates development will have introduced a total of 36.5 acres of publicly accessible open space, consisting of approximately 18 acres of active space and 18.5 acres of passive space. The overall open space ratio would be 3.28 acres for the No Action Alternative (inclusive of the Gateway Estates development), which would remain considerably above the CEQR recommended ratio of 2.5 acres of combined active and passive open space per 1,000 residents. The passive open space ratio of 1.38 would be above the guideline of 0.5 acres. Although the active open space ratio of 1.90 acres per 1,000 residents would be slightly below the targeted goal of 2.0 acres, it would not constitute an impact per the guidance of the *CEQR Technical Manual*. Therefore, neither the proposed action, 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 action, 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. However, neither the proposed action, 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 Gateway Estates development will be complete, the effect of which in the study area will be the

completion of the residential streetscapes directly north and northwest of the project site. The existing street pattern in the study area will be unchanged as a result, but the lots will be fully built-out, and it is expected that lawns will be planted where such setbacks exist, and perimeter landscaping along sidewalks will have matured substantially. In addition, the portion of Spring Creek Park directly south of Parcel A is expected to be developed as a publicly accessible park area as part of the Gateway Estates development in the No Action Alternative, as well as a new park to be located west of the Parcel B. 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 action 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 action would result in the redevelopment of the project site in a manner consistent with the urban design of the developed portions of surrounding blocks in the study area. It is expected that the combination of ground-floor commercial uses on both parcels A and B, the street tree plantings and sidewalk improvements surrounding the project site, and the introduction of public open space (Schroeders Walk) on Parcel B would contribute to the attractiveness of the streetscapes that have already been partly improved through landscaping on surrounding properties as part of the FCURP implementation (and will be further improved in the No Action Alternative). Further, the mix of commercial uses, residences, and open space introduced with the proposed action would be expected to lead to an increased level of pedestrian activity along both Parcel A- and Parcel B-adjacent sidewalks, thereby contributing to an improved sense of pedestrian connectivity between the existing and planned parks in the study area. Therefore, although neither the proposed action, 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 action than with the No Action Alternative, alone 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 natural resources are present on the project site, which comprises 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, and so the No Action Alternative would not result in any effect to natural resources. Therefore, neither the proposed action, 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 is expected on the project site that would disturb any portion of the project site, neither the landfill nor the natural soils. 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 action 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 explained in Chapter 10, the Restrictive Declaration would require the preparation of a Remedial Action Plan ("RAP"), detailing the installation of building vapor barriers to address the potential for exposure to subsurface methane, and a Construction Health and Safety Plan ("CHASP") to prevent human exposure (worker and public) to any unidentified or potential on-site contamination. Therefore, neither the proposed action, 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 under-developed condition, with stormwater runoff conditions the same as for existing conditions (and conditions in the future without the proposed action) 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 action, 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 action would introduce new residents and commercial occupants to the project site and also substantially increase the impermeable surfaces on the project site. However, as described in Chapter 11, the proposed action 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 action, 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. Pursuant to the *CEQR Technical Manual*, few projects have the potential to generate substantial amounts of solid waste (50 tons per week or more) and, therefore, most projects would not result in significant adverse impacts. As described in Chapter 12, "Solid Waste and Sanitation Services," the proposed action would generate approximately

41.42 tons of solid waste per week, which would not constitute a significant adverse impact. Therefore, neither the proposed action, 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 action would be expected to result in a total operational energy consumption of approximately 150 billion British Thermal Units (“BTUs”) annually, which would not overburden energy supply systems or result in a significant adverse impact. Therefore, neither proposed action, 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 action (No Action Alternative) are established by applying a background traffic growth rate, and then adding vehicular volumes expected to be generated by elements of the Gateway Estates development. The analyses show that the majority of the intersections in the study area would operate at acceptable levels during the weekday AM, midday, and PM, and Saturday midday peak analysis hours under the No Action Alternative – with overall operations at level of service (“LOS”) C or better.

The operational change at the five-legged intersection of Linden Boulevard and Fountain Avenue/Loring Avenue, which is expected in the No Action Alternative, would improve the LOS from the existing conditions; however, the southbound left-turn on Fountain Avenue would continue to operate at LOS F during the PM peak hour in the No Action condition. Another movement that would operate with some congestion is the southbound approach at the intersection of Fountain Avenue and Vandalia Avenue, which would operate at LOS F in the Saturday midday peak hour. Additionally, the realignment of Jerome Street and Flatlands Avenue, which is expected in the No Action Alternative (as a result of the Gateway Estates development), would improve the conditions at Flatlands and Schenck avenues.

As described in Chapter 14, “Transportation,” the traffic impact analysis indicates the potential for significant adverse impacts at four intersections during one or more analyzed peak hours with the proposed action. Significant adverse impacts were identified for one lane group in the weekday AM peak hour, one lane group in the weekday midday peak hour, three lane groups in the weekday PM peak hour, and four lane groups in the Saturday peak hour. While the proposed action would result in

significant adverse impacts that could all 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 beyond existing demand, throughout the 2015 through 2028 period, as a result of background growth and incremental bus trips associated with the Gateway Estates development and the East New York Rezoning proposal. 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.

The East New York Rezoning proposal is estimated to increase ridership on the B13 bus route at the peak load point by 35 northbound and 32 southbound trips during the AM peak hour, and by 34 northbound and 61 southbound trips in the PM peak hour. Ridership on the Q8 bus route would increase by approximately 14 eastbound and 3 westbound trips during the AM peak hour, and by 5 eastbound and 18 westbound trips during the PM peak hour. The East New York Rezoning proposal would require adding one additional bus to the Q8 bus route in the westbound direction during the PM peak hour to accommodate the demand. 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 eastbound Q8 route in the AM peak hour. 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 Q8 route to address its capacity shortfall on this route in the eastbound direction in the AM peak hour.

Based on projected levels of bus service in the No Action Alternative (including service increases identified as mitigation measures in the *Gateway Estates II FEIS* and the *East New York Rezoning Proposal FEIS*) in combination with bus trips that the proposed action is expected to generate, in the future with the proposed action there would be a capacity shortfall of 83 passenger spaces on the northbound B13 service, 131 passenger spaces on the northbound B83 service, and 17 passengers on the eastbound Q8 in the AM peak hour. The PM peak hour would experience a capacity shortfall of 517 passenger spaces on the southbound B83 service. Therefore, the proposed action would cause the northbound B13 and B83 routes and eastbound Q8 route in the AM peak hour, and the southbound B83 route in the PM peak hour, to experience significant adverse impacts based on *CEQR Technical Manual* criteria. 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.

Thus, if the mitigation measures proposed as part of the proposed action is effective, then there would be no difference in effects to transit services with either the proposed action or the No Action Alternative. However, as discussed in Chapter 24, “Unavoidable Adverse Impacts,” were the mitigation measures proposed as part of the proposed action not provided by NYCT, then the proposed action may result in unavoidable adverse impacts, in which case the proposed action 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 2015 through 2028 period as a result of background growth, as well as demand from the nearby Gateway Estates development. In determining pedestrian volumes for the No Action Alternative, walk-trips to the bus stops on Fountain Avenue from the Gateway Estates development were added to the intersection of Vandalia Avenue and Fountain Avenue. The analysis shows that all crosswalks at all analyzed intersections would operate at a LOS A. The proposed action would generate an increased number of pedestrian trips, with overall operations at LOS C or better. Therefore, neither the No Action Alternative nor the proposed action would result in significant adverse pedestrian impacts.

Parking

In the No Action Alternative, no new off-street public parking lots within ¼-mile of the project site are assumed to be developed by 2028. However, as described in Chapter 14, “Transportation,” the new roadway network that is to be completed as a result of the Gateway Estates development would provide additional on-street parking in the future without the proposed action (No Action Alternative); these on-street parking spaces would provide the necessary capacity for the additional parking demand resulting with the completion of the Gateway Estates development. As described in Chapter 14, 475 parking spaces would be provided on the project site under the proposed action (221 spaces for Parcel A and 254 spaces for Parcel B), and would be available to residents and, in part, to commercial users; in combination with available on-street parking, there would be adequate capacity to meet project-generated demand for parking, and the proposed action would result in no significant adverse impact to parking. Thus, neither the No Action Alternative nor the proposed action would result in any significant adverse parking impacts.

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 action would not result in a violation of

the National Ambient Air Quality Standards (“NAAQS”) for carbon monoxide, and so there would be no significant adverse impacts to air quality attributable to mobile sources with the proposed action.

The stationary source analysis prepared for the proposed action, as presented in Chapter 15, “Air Quality,” concludes that, with some restrictions on stack placement, proposed action pollutant emissions of nitrogen dioxide (“NO₂”), sulfur dioxide (“SO₂”), particulate matter less than 2.5 microns in diameter (“PM_{2.5}”) and particulate matter less than 10 microns in diameter (“PM₁₀”) related to the use of No. 2 fuel oil for heating, ventilation, and air conditioning (“HVAC”) systems would not result in any violations of applicable NAAQS or exceed the New York City Department of Environmental Protection / New York State Department of Environmental Conservation (“NYCDEP/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 fuel oil for HVAC systems or other purposes on the project site).

Finally, it is not anticipated that existing large scale pollutant sources, in addition to industrial sources that would emit air toxics, would result in any impacts to any of the sensitive land uses as part of the proposed action, nor is it anticipated that malodorous emissions related to the 26th Ward Waste Water Treatment Plant would result in significant adverse impacts with the proposed action; 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 action, 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

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 actions. Pursuant to the guidelines of the *CEQR Technical Manual*, the analysis of the proposed action 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 action would be consistent with the goals of encouraging construction of resource- and energy-efficient buildings and encouraging development that is reliant upon public transit. Therefore, neither the proposed action, as described in Chapter 16, “Greenhouse Gas Emissions,” nor the No Action Alternative would result in significant adverse impacts related to greenhouse gas emissions.

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 as the future No Action condition) and conditions with the proposed action is predicted to be 1.4 decibels (“dB”) at one analysis location with the proposed action; the differences in noise level at the remaining analysis locations, compared to the No Action Alternative, are predicted to be in the range of 0.0 dB to 0.9 dB with the proposed action. The differences at these locations would be considered insignificant and imperceptible, and no increase would exceed the three dBA CEQR threshold; no significant adverse noise impacts would result with the proposed action. Therefore, neither the proposed action, 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 action 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 action would result in no significant adverse impacts to any of these analysis areas. Therefore, neither the proposed action, 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 action (representing the No Action Alternative) would be largely determined by the completion of the Gateway Estates development. As described in Chapter 19, the proposed action would result in no significant adverse impacts related to key components of neighborhood character, including 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 with the increased delay at certain signalized intersections in the area, such impacts could be mitigated. Thus, the proposed action would not significantly adversely affect neighborhood character, overall. Therefore, neither the proposed action, 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 action would not result in significant adverse construction-period impacts to traffic, transit, pedestrians, parking, vibration, or air quality as a result of construction. However, construction activities associated with the proposed action would 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,” the proposed action would result in significant adverse noise impacts during construction, though the effects of construction noise at neighboring Gateway Estates buildings, though these would be temporary and would be limited through use of best practices. Potential significant adverse impacts to interior noise levels in Parcel B project buildings that would be occupied during construction of other buildings on Parcel B would be avoided by a requirement in the Restrictive Declaration that such buildings use double-glazed windows and have an alternate source of ventilation. The effects of construction noise on sensitive receptors would vary depending on the location of the noise source. Further, during most of the construction-period for each phase, noise levels would decrease significantly following the completion of pile driving activities, which would occur for up to approximately 12 weeks at the beginning of each of the three phases constructed while Parcel B is partially occupied.

As explained in Chapter 20, “Construction,” noise control measures that would partially mitigate significant adverse construction noise impacts, and which the developer would be required in the Restrictive Declaration to implement or consider are described below. The Restrictive Declaration would require contract specifications requiring (1) contractors to comply with all the requirements and regulations of the New York City Noise Code and United States Environmental Protection Agency (“USEPA”) noise emission standards for construction equipment; (2) devices and activities which are subject to the provisions of the New York City Noise Code to be operated, conducted, constructed or manufactured without causing a violation of the code; (3) all work to be conducted in compliance with the regulations set forth in the code that control noise levels due to construction work.

Therefore, in summary, significant adverse impacts related to noise would occur with the proposed action during construction, but would not occur with the No Action Alternative. With the project requirements (including window attenuation requirements) in place per the Restrictive Declaration to avoid significant adverse noise impacts on the project site, as well as mitigation measures in place (per the Restrictive Declaration) to reduce noise levels during construction, the potential for significant adverse impacts related to noise would be minimized with the proposed action, though not entirely eliminated; as described in Chapter 20, “Construction,” there would remain the likely potential for significant adverse construction-period noise impacts during pile driving activities, but these activities

would occur for a limited duration. However, as discussed in Chapter 24, “Unavoidable Adverse Impacts,” were the mitigation measures proposed as part of the proposed action not effective at mitigating the construction-period noise impacts, then the proposed action may result in unavoidable adverse impacts related to noise. Given the potential for significant adverse construction-period noise impacts, though limited in duration, the proposed action compares less favorably to the No Action Alternative.

NO ACTION ALTERNATIVE SUPPORT OF GOALS AND OBJECTIVES

The No Action Alternative would not meet any of the project goals and objectives:

- The No Action Alternative would not provide for the construction of affordable housing, or affordable senior housing or housing accommodating people with intellectual and developmental disabilities, in a significantly underserved portion of Brooklyn;
- The No Action Alternative would not result in the beneficial reuse of primarily undeveloped acreage; and
- The No Action Alternative would not result in the divestment of surplus State property, or realization of revenue to the State and City through proceeds of the sale and future property taxes.