Chapter 20: Alternatives

A. INTRODUCTION

In accordance with the 2025 *City Environmental Quality Review (CEQR) Technical Manual*, this chapter presents and analyzes alternatives to the Proposed Actions, which include discretionary land use approvals from the New York City Planning Commission (CPC) and New York City Council as well as approval from the New York City Educational Construction Fund (ECF) for construction financing and the transfer, reallocation, and lease of property to facilitate the development of a new public school. Alternatives selected for consideration in an Environmental Impact Statement (EIS) are generally those which are feasible and have the potential to reduce, eliminate, or avoid adverse impacts of Proposed Actions while meeting some or all of its goals and objectives.

The co-Applicants, ECF and 240 Nassau Street Holdings, LLC, are seeking zoning approvals, including zoning map and text amendments, a special permit, and other City and State approvals and potential future U.S. Department of Housing and Urban Development (HUD) actions (the "Proposed Actions"), to facilitate the construction of a proposed mixed-use development on Block 110, Lot 25 and Block 111, Lot 1 (the "Project Site") in Downtown Brooklyn, Community District (CD) 2. The proposed development would include four new buildings totaling approximately 1.7 million gross square feet (gsf), including public school facilities; residential, retail, and community facility space; cultural center space; and open space (the "Proposed Project").

The Proposed Actions include the transfer, reallocation, and lease of property among 240 Nassau Street Holdings, LLC, ECF, and the City of New York to allow for the Proposed Project and ECF financing and discretionary zoning approvals from CPC and New York City Council. A detailed description of the Proposed Project and the approvals needed to facilitate the Proposed Project is presented in Chapter 1, "Project Description."

The Proposed Project would occupy an approximately 80,000-sf portion of Blocks 110 and 111, bounded by Nassau Street to the north, Navy Street to the east, Concord Street to the south, and Golconda Playground, a public park maintained by the New York City Department of Parks and Recreation (NYC Parks) to the west. Elevated above a portion of Golconda Playground is the Brooklyn Queens Expressway (BQE).

Alternatives in this chapter are assessed to determine to what extent they would meet the goals and objectives of the Proposed Actions. The Proposed Actions are necessary to construct the proposed mixed-use project accommodating the new public school, residential space, retail, community facility space, cultural center space, and open space. Changes to the existing zoning, among other related land use actions, would allow for the mixed-use development program to proceed.

The co-Applicants propose the comprehensive redevelopment of the Project Site with a dynamic, mixed-use development that includes a new public school and residential, retail,

community facility space, cultural center space, and open space. ECF is a New York State public benefit corporation that finances and develops mixed-use developments that feature new school facilities on behalf of the New York City Department of Education (DOE). The Proposed Actions would provide state-of-the-art school facilities for pre-Kindergarten through 8th grade. The improvements would achieve a better learning environment by providing modern educational facilities and additional public school capacity at the primary and intermediate school level in Community School District 13.

In connection with the construction of a new public school on the Project Site, 240 Nassau Street Holdings, LLC, would develop new residential space, retail, community center, cultural space, and publicly accessible open space. The Proposed Actions would facilitate the redevelopment of an underutilized parcel that is well positioned to support new development at a higher density. The Project Site has frontage along three wide streets (Nassau, Navy, and Concord Streets), and is proximate to transit, including bus and subway service. Additionally, the Project Site's location at the edge of Downtown Brooklyn adjacent to the BQE and just south of the Brooklyn Navy Yard and in close proximity to two mapped Parks makes it an appropriate location to concentrate additional density.

The modifications sought under the special permit would facilitate an improved site plan that allows for the placement of the proposed school, mixed-use use residential buildings, community center and public and private open space in unified manner that compliments the adjacent public open space in Golconda Playground. The proposed public open space would feature a north-south public corridor located at the historic location of Hudson Avenue and a new public corridor running east-west between the proposed buildings, connecting Golconda Playground with Commodore Barry Park. Public programming would be located at the most desirable frontages with the new school located at the intersection of Nassau and Navy Streets and the community facility, cultural center and senior affordable housing programs wrapping Golconda Playground frontages. New retail space would be located on the street frontages and along the interior public corridors to activate the public realm. Buildings 1 and 3, the largest of the four proposed buildings, would be located on opposing corners of the Project Site to maximize the availability of light and air.

The local retail and community facility space and new publicly accessible open space would enliven the public realm along Nassau, Navy, and Concord Streets, inviting residents and visitors from the surrounding blocks. The modification of Mandatory Inclusionary Housing (MIH) as it relates to development on ECF property would maximize the public benefits associated with a new and expanded school, the provision of affordable and senior housing and redevelopment of underutilized City-owned property with a dynamic mixed-use development. The improved school facilities and increase in public school capacity would support and strengthen the residential character of the surrounding neighborhood. The proposed residential, commercial, and community facility space, as well as proposed publicly accessible open space would be consistent with existing and planned developments in Downtown Brooklyn.

This chapter considers two alternatives to the Proposed Actions:

- A No Action Alternative, which is mandated by CEQR and the State Environmental Quality Review Act (SEQRA) and is intended to provide the lead and involved agencies with an assessment of the expected environmental impacts of no action on their part.

- A No Unmitigated Significant Adverse Impacts Alternative, which considers a project program which would eliminate the Proposed Actions' unmitigated significant adverse impacts.

PRINCIPAL CONCLUSIONS

NO ACTION ALTERNATIVE

The No Action Alternative examines future conditions in 2033 on the Project Site but assumes the absence of the Proposed Actions (i.e., none of the discretionary land use and other approvals). Under the No Action Alternative, existing zoning would remain unchanged and would continue to govern development on the Project Site. It is anticipated that the existing schools (P.S. 287, aka the Dr. Bailey K. Ashford school, and the Community Roots Charter School) on Block 111, Lot 1 would remain; and the Madison Square Boys and Girls Club on Block 110, Lot 25 would be closed. Block 110, Lot 25 will be developed with an as-of-right seven-story, 75-foot building (110 feet including bulkhead) containing approximately 83,500 gsf of residential space (approximately 84 units) that complies with the current R6 zoning regulations. The No Action estimated population is approximately 171 residents and 75 workers on the Project Site.

Unlike the Proposed Actions, the No Action Alternative would not result in significant adverse impacts to open space, transportation (traffic, transit, and pedestrians), and construction (traffic, pedestrians, and noise). The No Action Alternative includes substantially less development and at a smaller scale when compared to the Proposed Actions. The No Action Alternative would introduce a smaller population to the Project Site as compared to the Proposed Actions and would result in slightly higher open space ratios for the ½-mile study area. The No Action Alternative would place less demand on area open spaces and would result in fewer trips as compared to the Proposed Actions and would have overall lower traffic and pedestrian volumes. The No Action Alternative would have a shorter construction duration, and the effects of construction activity would be less than the Proposed Actions, including the duration and magnitude of construction-period noise.

None of the public benefits attributable to the Proposed Actions would occur under the No Action Alternative. These benefits include state-of-the-art school facilities for pre-Kindergarten through 8th grade, approximately 302 units of affordable housing, approximately 20,896 sf (0.48 acres) of new publicly accessible open space, and local retail, community facility and cultural space—none of which would be provided in the No Action Alternative.

NO UNMITIGATED SIGNIFICANT ADVERSE IMPACTS ALTERNATIVE

The No Unmitigated Significant Adverse Impacts Alternative examines a scenario in which the components of the Proposed Project are changed specifically to avoid the unmitigated significant adverse impacts associated with the Proposed Project. There is the potential for the Proposed Actions to result in unmitigated significant adverse impacts related to open space, transportation (traffic, transit, and pedestrians), and construction (traffic, transit, pedestrians, and noise). As described in detail below, no reasonable alternative could be developed which eliminates these unmitigated significant adverse impacts without substantially compromising the stated goals of the Proposed Actions.

B. NO ACTION ALTERNATIVE

The No Action Alternative examines future conditions on the Project Site in the absence of the Proposed Project. Under the No Action Alternative, the existing R6 zoning would remain in the area affected by the Proposed Actions and would govern the placement of buildings and height and bulk regulations.

It is anticipated that in the No Action Alternative, the existing schools, Public School (P.S.) 287 and the Community Roots Charter School, on Block 111, Lot 1 would remain; and the Madison Square Boys and Girls Club on Block 110, Lot 25 would be closed. Block 110, Lot 25 will be developed with an as-of-right, market-rate building that complies with the current R6 zoning regulations. The development under the No Action Alternative would be a seven-story, 75-foot-tall building (110 feet including bulkhead) containing approximately 83,500 gsf of market-rate residential use (approximately 84 units).

LAND USE, ZONING, AND PUBLIC POLICY

As compared to the Proposed Project, the No Action Alternative would include less residential space (but no affordable units), no retail, no cultural space, no community facility, and no open space. Under the No Action Alternative, the existing schools (P.S. 287 and the Community Roots Charter School) would remain, and the Madison Square Boys and Girls Club would be closed. See **Table 20-1** for a comparison of the programs under the No Action Alternative and the Proposed Actions.

Table 20-1
Comparison of No Action Alternative and Proposed Actions

Use	No Action Alternative	Proposed Actions	Increment
Residential (DU)	84	1,502	+1,418
Retail (GSF)	0	34,000	+34,000
Community Facility (GSF)	0	30,000	+30,000
Cultural (GSF)	0	15,000	+15,000
Primary School and Intermediate School (GSF)	110,000	121,000	+11,000
Students[1]	721	931	+210
Staff[2]	72	93	+21

Note:
[1] Primary school square footage assumes 130 sf per seat
[2] Assumes 1 staff per 10 students.

Under the No Action Alternative, a residential building would replace the Madison Boys and Girls Club, a community facility, and all other uses would remain unchanged. Under the existing zoning, redevelopment on the Project Site does not offer the flexibility needed to develop the mixed-use buildings and open space contemplated under the Proposed Actions. Unlike the Proposed Actions, the No Action Alternative would not improve land use conditions in the Project Site because it would not introduce critical housing opportunities (including affordable housing) and new community facility, commercial, and open space uses to the Project Site. The No Action Alternative would be less supportive of public policies articulated in the Block by Block, Where We Live NYC, and OneNYC and PlaNYC that aim to expand the City's housing supply, including the supply of available affordable housing, and promote economic development through the provision of new space for community facility and commercial uses in a transit accessible area of the City.

While the No Action Alternative does not achieve the beneficial land use changes that would result with the Proposed Actions, neither the Proposed Actions nor the No Action Alternative would result in significant adverse impacts related to land use, zoning, and public policy.

SOCIOECONOMIC CONDITIONS

The No Action Alternative, like the Proposed Actions, would not result in significant adverse impacts related to socioeconomic conditions. Under the No Action Alternative, the Project Site would be developed with a new market-rate residential building. The No Action Alternative would result in 1,418 fewer residential units and no affordable housing. The No Action Alternative would not include retail, cultural space, publicly accessible open space, or community facilities.

As with the Proposed Actions, no direct or indirect residential displacement or business displacement would occur under the No Action Alternative. The No Action Alternative, like the Proposed Actions, would not result in a significant adverse impact on business conditions in any specific industry or any category of businesses, nor would it impair the economic viability of any specific industry or category of business.

COMMUNITY FACILITIES AND SERVICES

The No Action Alternative, like the Proposed Actions, would not result in significant adverse impacts on community facilities and services. Under the No Action Alternative, the existing schools (P.S. 287 and the Community Roots Charter School) would remain; and the Madison Square Boys and Girls Club would be closed. The No Action Alternative would result in less public school capacity (658 students) than the Proposed Actions. Like the Proposed Actions, the No Action Alternative would not result in any significant adverse impacts with regard to public schools, early childhood programs, library services, or police, fire, and emergency medical services.

OPEN SPACE

Similar to the Proposed Actions, the No Action Alternative would not result in direct impacts on any open space resources. However, as the No Action Alternative would introduce fewer residents and workers, the open space ratios for the study area under the No Action Alternative would be higher than with the Proposed Actions. Under the No Action Alternative, the total, active, and passive open space ratios for the study area would be 1.733, 0.401, and 1.332 acres per 1,000 residents, respectively (compared to 1.650, 0.382, and 1.269, respectively, under the Proposed Actions). As under the Proposed Actions, the total and active open space ratios under the No Action Alternative would be below the *CEQR Technical Manual* open space guidelines of 2.5 acres of total open space per 1,000 residents, including 2.0 acres of active open space.

However, the No Action Alternative would not provide any publicly accessible open space on the Project Site and there would be no visual and physical connections between Golconda Playground and Commodore Bary Park.

SHADOWS

The No Action Alternative, like the Proposed Actions, would not result in significant adverse impacts to shadows. With the No Action Alternative, it is assumed an approximately 75-foot-

tall building (110 feet including bulkhead) would be developed on Block 110, Lot 25 of the Project Site. The No Action Alternative would not result in significant adverse incremental shadows from the affected sunlight-sensitive resources described in Chapter 6, "Shadows." The No Action Alternative would not result in a significant shadow impact on any sunlight-sensitive resources.

HISTORIC AND CULTURAL RESOURCES

The New York City Landmarks Preservation Commission (LPC) has determined that there are no architectural or archaeological concerns for the Project Site; therefore, neither the No Action Alternative nor the Proposed Actions would result in a significant adverse impact.

Construction under the No Action Alternative and the Proposed Actions would occur within 90 feet of the BQE, which has been determined eligible for listing on the State and National Registers of Historic Places (S/NR-eligible). Unlike the Proposed Actions, a Construction Protection Plan (CPP) would not be implemented prior to the start of construction activities at the Project Site under the No Action Alternative.

URBAN DESIGN AND VISUAL RESOURCES

The No Action Alternative, like the Proposed Actions, would not result in significant adverse impacts to urban design and visual resources; however, the benefits associated with Proposed Project—improving and increasing the pedestrian experience in the Project Site through the redevelopment of an underutilized site with mixed-use development containing active ground-floor uses such as retail, community facility, and cultural space and open space connectivity to Golconda Playground that would enliven the surrounding streetscapes–would not be realized. Absent the Proposed Project, it is assumed that the existing school building would remain on the Project Site, and an approximately 75-foot-tall residential building (110 feet including bulkhead) would be developed on Block 110, Lot 25 within the current zoning regulations.

NATURAL RESOURCES

The No Action Alternative, like the Proposed Project, would not result in a significant adverse impact on natural resources. The No Action Alternative and the Proposed Actions would include development at the Project Site. Any trees removed or impacted during construction would require replacement or monetary restitution in compliance with Local Law 3 of 2010 and Chapter 5 of Title 56 of the Rules of the City of New York. Development under the No Action Alternative would not take place within the current floodplain but could be vulnerable to flooding under projected conditions.[1] As such, potential design measures to improve flood resiliency, such as corrosion-resistant finishes, continuous waterproofing membrane, and dry floodproofing measures, would be considered as part of the No Action Alternative, similar to the Proposed Actions. Development under the No Action Alternative would be certified under Leadership in Energy and Environmental Design (LEED) v4.1 Communities: Plan and Design framework.

[1] NYC Flood Hazard Mapper (https://dcp.maps.arcgis.com/apps/webappviewer/index.html?id=1c37d271fba14163bbb520517153d6d5)

HAZARDOUS MATERIALS

Unlike the Proposed Actions, development under the No Action Alternative would not be subject to the testing and remedial requirements that would apply with the (E) Designation, and there would be no binding institutional control in place to minimize exposure of contamination to construction workers and the future occupants of the residential building on Block 110, Lot 25.

WATER AND SEWER INFRASTRUCTURE

Neither the Proposed Actions nor the No Action Alternative would result in significant adverse impacts on the City's water supply, wastewater treatment, or stormwater conveyance infrastructure. Compared with the Proposed Actions, the No Action Alternative would generate less demand on the City's water supply and wastewater treatment infrastructure. Similar to the Proposed Project, the incorporation of selected best management practices (BMPs) would be required as part of the New York City Department of Environmental Protection (DEP) site connection application process for new buildings. In addition, development in the No Action Alternative, like the Proposed Actions, would occur in accordance with the New York City Plumbing and be required to utilize low-flow plumbing fixtures to further reduce sanitary flows.

SOLID WASTE AND SANITATION SERVICES

While the No Action Alternative would generate less demand on New York City's solid waste and sanitation services than Proposed Actions, neither the Proposed Actions nor the No Action Alternative would adversely affect solid waste and sanitation services or place a significant burden on the City's solid waste management system.

ENERGY

Neither the No Action Alternative nor the Proposed Actions would result in a significant adverse impact related to energy. Because the No Action Alternative would result in less development than the Proposed Actions, its energy demand would be less as compared to the Proposed Actions. Development under the No Action Alternative and Proposed Actions would be subject to New York City's energy efficiency and carbon intensity regulations and is anticipated to result in more energy efficient buildings. The commitment for buildings to use fully electric heating, ventilation, and air conditioning (HVAC) and hot water systems under both the No Action Alternative and the Proposed Actions would result in estimated energy consumption being reduced substantially when compared to the City's energy consumption factors for buildings that utilize fossil fuel-fired systems.

Development resulting from the No Action Alternative and the Proposed Project would be required to comply with the New York City Energy Conservation Code (NYCECC), which imposes performance requirements for HVAC systems, as well as the exterior building envelope of new buildings. In compliance with code, new development must meet standards for energy conservation, which include requirements relating to energy efficiency and combined thermal transmittance. Further, development under the No Action Alternative and the Proposed Actions would be constructed in accordance with the City's flood-resistant construction requirements and would be LEED-certified.

TRANSPORTATION

Unlike with the Proposed Actions, the No Action Alternative would not result in any significant adverse traffic, transit, or pedestrian impacts. That is because the No Action Alternative would result in far fewer vehicle trips, i.e., about 200 to 360 vehicles per peak hour and considerably fewer person trips, i.e., approximately 1,700 to 3,700 person trips per peak hour than the Proposed Actions. Unlike with the Proposed Actions, the No Action Alternative would not result in significant adverse traffic impacts at nine, four, 11, and six intersections in the weekday AM, midday, PM, and Saturday peak hours, respectively.

From a transportation perspective, the difference on the Project Site between existing conditions and No Action Alternative conditions is the replacement of the 24,000 gsf community facility land use with a residential land use adding 84 DUs. Comparing existing trip generation to No Action Alternative trip generation would result in slight decreases in vehicle trips per hour, i.e., about 10 to 20 vehicles per peak hour, and decreases in person trips per hour, i.e., approximately 50 to 85 person trips per peak hour. In the No Action Alternative, the decreases in vehicle and person trips from as-of-right development on the Project Site may be offset by increases of these types of trips in the study area as a result of background growth and other development projects likely to occur within and in the vicinity of the project site. Therefore, No Action Alternative traffic, transit, pedestrian, and parking conditions would be similar to existing conditions, which experience widespread traffic, transit, and pedestrian congestion during some peak hours.

AIR QUALITY

The No Action Alternative would result in fewer vehicle trips than the Proposed Actions, and the maximum pollutant concentrations from mobile sources under the No Action Alternative would be lower than the Proposed Actions. Therefore, as with the Proposed Actions, concentrations of carbon monoxide (CO) and fine particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) due to traffic at intersections under the No Action Alternative would not result in any violations of National Ambient Air Quality Standards (NAAQS). Therefore, the No Action Alternative is not expected to result in a significant adverse air quality impact from mobile sources of emissions.

Like the Proposed Actions, the No Action Alternative would not result in significant adverse stationary source air quality impacts.

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

GREENHOUSE GAS EMISSIONS

The No Action Alternative, like the Proposed Actions, would utilize energy efficiency measures and design elements and would be designed to comply with New York City's carbon intensity limits for the 2030–2035 period specified by New York City Department of Buildings (DOB) and be required at a minimum to achieve the energy efficiency requirements of the New York City Building Code under the NYCECC. Furthermore, GHG goals would be supported by virtue of the Project Site's proximity to public transportation; minimizing the usage of fossil fuels through the commitment to utilize fully electric heat, residential cooking, and hot water systems for residential, retail, and community spaces; commitment to construction equipment emission controls and other construction practices.

RESILIENCE TO CLIMATE CHANGE

Development in the No Action Alternative would be subject to the same future potential flood risk as the Proposed Actions, and similar resiliency measures would be incorporated into new development on the Project Site. All new construction would be designed in accordance with Appendix G, "Flood Resistant Construction," of the New York City Building Code and designed to resist hydrostatic, hydrodynamic, and other flood-related loads, including the effects of buoyancy. Critical mechanical equipment would either be elevated above the design flood elevation or enclosed within a dry floodproofed area and would remain protected from flooding throughout the life of the buildings in the No Action Alternative and the Proposed Actions.

NOISE

The No Action Alternative, like the Proposed Actions, would not result in a significant adverse noise impact. However, the No Action Alternative would not include an (E) Designation requiring window-wall attenuation in the residential building anticipated on Block 110, Lot 25.

Under the No Action Alternative, it is assumed that building mechanical equipment (i.e., heating, ventilation, and air conditioning systems) would be designed to meet all applicable noise regulations (i.e., Subchapter 5, §24-227 of the New York City Noise Control Code and the New York City Department of Buildings Code). The measures required in the No Action Alternative would be comparable to measures required under the Proposed Actions. These commitments would preclude noise levels that result in any significant increase in ambient noise.

NEIGHBORHOOD CHARACTER

Similar to the Proposed Actions, the No Action Alternative would not result in significant adverse impacts associated with neighborhood character. As with the Proposed Actions, the No Action Alternative would not result in significant adverse impacts in the areas of land use, zoning, and public policy; socioeconomic conditions; community facilities and services, open space, shadows, historic and cultural resources; urban design and visual resources; and noise. Further, like the Proposed Actions, the significant adverse impacts related to transportation would not constitute an impact to neighborhood character. However, the No Action Alternative would not provide the land use, open space, and urban design benefits of the Proposed Actions, including the introduction of publicly accessible open space and improved network of open spaces and connectivity to Golconda Playground and Commodore Barry Park.

CONSTRUCTION

As the amount of new construction under the No Action Alternative would be less than the Proposed Actions, the No Action Alternative would not generate as much temporary construction disruption. Thus, the No Action Alternative would generate fewer construction worker and delivery truck trips than the Proposed Actions, though it would still generate worker and truck delivery trips made to the Project Site. Construction of the Proposed Actions would result in temporary significant adverse traffic and pedestrian impacts during the peak construction periods. The fewer construction worker and delivery truck trips generated by the No Action Alternative, i.e., about 175 fewer daily workers and approximately 15 fewer daily truck trips during peak construction conditions, would still have the potential to result in

temporary significant adverse traffic and pedestrian impacts during the peak construction periods due to widespread traffic and pedestrian congestion during some peak hours.

As with the Proposed Actions, measures would be required for the No Action Alternative to minimize construction-related effects to the adjacent portion of the S/NR-eligible BQE. Although the No Action Alternative would result in shorter durations of construction-related noise than the Proposed Actions, it would result in comparable maximum construction noise levels at receptors near the Project Site. Therefore, like the Proposed Actions, the No Action Alternative would have the potential to result in significant adverse impacts with respect to construction noise.

C. NO UNMITIGATED SIGNIFICANT ADVERSE IMPACTS ALTERNATIVE

The No Unmitigated Significant Adverse Impacts Alternative examines a scenario in which the bulk and site planning components of the Proposed Actions are changed specifically to avoid the unmitigated significant adverse impacts caused as a result of development under the Proposed Actions. Based on the analyses presented in other chapters of this EIS, there is the potential for the Proposed Actions to result in significant adverse impacts for which no practicable mitigation has been identified. Specifically, unmitigated impacts were identified with respect to open space, transportation (traffic, transit, and pedestrian), and construction (traffic, pedestrian, and noise). This alternative considers development that would not result in any significant adverse impacts that could not be fully mitigated. In order to identify a No Unmitigated Significant Adverse Impact Alternative, the full range of impacts identified for the Proposed Actions was considered to determine what avoidance measures would be required for the different types of impacts. As detailed below, to eliminate all unmitigated significant adverse impacts, the Proposed Actions would have to be modified to a point where the principal goals and objectives would not be fully realized.

OPEN SPACE

The Proposed Actions are expected to introduce approximately 2,879 residents to the ½-mile residential study area compared to the No Action condition. Given the anticipated decrease in the total, active, and passive open space ratios in the residential study area and the fact that total and active open space ratios in the study area would remain below the City guidelines, the Proposed Actions would result in a significant adverse indirect impact to open space resources in the residential study area.

To avoid the identified significant adverse open space impact, the number of residents generated by the Proposed Actions would have to be reduced to less than 2,439 persons (or less than approximately 1,200 DUs). This would represent an approximately 15 percent reduction in the number of incremental DUs anticipated with the Proposed Project. However, such a reduction would severely inhibit one of the primary goals of the Proposed Actions, which is to facilitate mixed-use development on the Project Site that includes housing, including needed affordable housing. Alternatively, approximately 40,900 square feet (sf) or 0.94 acres (almost one acre) of additional publicly accessible open space (including a minimum of 0.94 acres of active open space) could be added to the study area to avoid the unmitigated significant adverse open space impact.

TRANSPORTATION

As discussed in Chapter 11, "Transportation," significant adverse transportation-related impacts were identified for the Proposed Actions. Among these, unmitigated impacts have been identified for traffic (local intersections), transit (subway station vertical circulation elements), and pedestrians (sidewalks and crosswalks) under the Proposed Actions. For each of these impacted conditions, modified development programs were explored to determine if a different program could have the potential to eliminate the identified unmitigated significant transportation-related impacts. Existing conditions experience widespread traffic, transit, and pedestrian congestion during some peak hours. Therefore, almost any development that would generate more traffic, transit, and pedestrian trips than the No Action development at the Project Site is expected to result in unmitigated traffic, transit, and pedestrian impacts, and no reasonable alternative could be developed to avoid such impacts without substantially compromising the Proposed Actions' stated goals and objectives.

CONSTRUCTION

TRANSPORTATION

Construction of the Proposed Actions would result in temporary significant adverse traffic and pedestrian impacts during the peak construction periods. Existing conditions experience widespread traffic and pedestrian congestion during some peak hours. Therefore, almost any construction activity that would generate traffic and pedestrian trips at the Project Site is expected to result in unmitigated traffic and pedestrian impacts, and no reasonable alternative could be developed to avoid such impacts without substantially compromising the Proposed Actions' stated goals and objectives.

NOISE

Chapter 17, "Construction," identifies the potential for construction under the Proposed Actions to result in significant adverse construction noise impacts at three receptors near or on the Project Site as shown in Figure 17-2, i.e., the fifth floor of the south façade of the New York City Housing Authority (NYCHA) Farragut Houses Building 1 along Nassau Street, the easternmost portion of the south façade and southernmost portion of the east façade of the future Building 1 on the Project Site, and the south façade, the southernmost portion of the western façade, and the southernmost portion of the eastern façade of the future Building 2 on the Project Site.

Construction noise levels of this magnitude and duration would constitute a significant adverse impact. Source or path controls beyond those already identified for the construction of the Proposed Actions would not be effective in fully mitigating the predicted construction noise impacts at these receptors.

As described in Chapter 19, "Mitigation," the co-Applicants would offer compensation for provision of storm windows for facades that do not already have insulated glass windows and/or window air conditioning unit on fifth floor residences on impacted facades of the Farragut Houses Building 1 that do not already have alternative means of ventilation. Additionally, the proposed future buildings predicted to experience significant adverse construction noise impacts would provide 25 to 31 dBA window/wall attenuation. Even with these measures, buildings with these constructions would be expected to experience interior

$L_{10(1)}$ values greater than the 45 dBA guideline recommended for residential and community spaces according to CEQR noise exposure guidelines. Therefore, no reasonable alternative could be developed to avoid temporary construction noise impacts at these receptors without substantially compromising the Proposed Actions' stated goals. ✷