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Alternatives

As described in the *2021 CEQR Technical Manual*, alternatives selected for consideration in an environmental impact statement are generally those which are feasible and have the potential to reduce, eliminate, or avoid adverse impacts of a proposed action while meeting some or all of the goals and objectives of this action.

Introduction

As described in **Chapter 1, Project Description**, the Applicant is proposing a series of land use actions (collectively the Proposed Actions) to facilitate the development of the proposed large-scale development of a site located in East New York in Brooklyn. The mixed-use development would contain a mix of community facility, commercial, and residential uses anchored by the existing Christian Cultural Center (CCC) facility and surrounded by publicly accessible open space and street system.

This chapter considers the following two alternatives to the Proposed Actions:

- A No-Action Alternative, which is mandated by City Environmental Quality Review (CEQR) and the State Environmental Quality Review Act (SEQRA). The No-Action Alternative is intended to provide the lead and involved agencies with an assessment of the expected environmental conditions in 2031 (the "build year" for the Proposed Actions) in the absence of the Proposed Actions.
- A No Unmitigated Significant Adverse Impacts Alternative, which would eliminate any unmitigated significant adverse impacts of the Proposed Actions.

Principal Conclusions

A summary of the principal conclusions for the two alternatives is described below.

No-Action Alternative

The No-Action Alternative examines future conditions in 2031 absent the Proposed Actions. In simplest terms, the No-Action Alternative is the No-Action condition identified, described, and assessed in the preceding chapters of this EIS. In the No-Action Alternative, the Development Site would remain in its existing condition, with only the existing CCC operational on the site (approximately 92,784-gross-square-foot (gsf) of community facility space and 385 striped accessory parking spaces).

As discussed in greater detail below, the significant adverse impacts associated with the Proposed Actions would not occur under the No-Action Alternative. However, the No-Action Alternative would not meet the project goals, and as compared to the Proposed Actions, the intended benefits—the introduction of affordable housing units and an array of community facility uses, economic activity introduced by local retail, and public open spaces—would be eliminated with the No-Action Alternative.

The No-Action Alternative would not result in any significant adverse impacts as no development would occur in the absence of the Proposed Actions.

No Unmitigated Significant Adverse Impacts Alternative

The No Unmitigated Significant Adverse Impacts Alternative examines a scenario in which the projected density increase and other components of the Proposed Actions are changed specifically to avoid the unmitigated significant adverse impacts associated with the Proposed Actions. The Proposed Actions would result in significant adverse impacts to community facilities specifically early childhood programs and libraries, and transportation specifically to traffic, subway, and pedestrian. A temporary impact to active open space would also occur during the construction period of the With-Action condition. Sensitivity analyses were conducted and it was determined that any new development on the site would be expected to result in unmitigated impacts. However, leaving the site in its existing condition would not meet the project's goals of creating a sustainable, affordable neighborhood and address the economic, social, educational and cultural needs of the neighborhood.

The project is projected to result in unmitigated traffic and noise impacts during construction. It was determined that any new construction on the Development Site would involve the use of construction equipment such as drill rigs and concrete mixer trucks and, as such, would be expected to result in unmitigated construction noise impacts. Therefore, to avoid these impacts, construction would need to be avoided, and the project and the applicant's intended benefits would not be realized.

No-Action Alternative

Description of the No-Action Alternative

The No-Action Alternative examines future conditions absent approval of the Proposed Actions. Conditions under this alternative are described under the "Future without the Proposed Actions" in the preceding EIS chapters and summarized below. In the No-Action Alternative, the Development Site is assumed to mostly remain unchanged from existing conditions, with only the existing CCC operational on the site (approximately 92,784 gsf of community facility space and 385 accessory parking spaces).

Conditions under the No-Action Alternative in comparison to the future with the Proposed Actions are described below.

Land Use, Zoning, and Public Policy

In the No-Action Alternative, the Development Site is assumed to remain largely unchanged from existing conditions, which includes only the existing CCC and its accessory parking spaces. No new developments are anticipated within the quarter-mile study area under the future No-Action Alternative.

The No-Action Alternative would not include the infill development of residential, community facility, and commercial space on the Development Site in areas currently occupied by an overflow surface parking lot for CCC. In the No-Action Alternative, zoning and public policies affecting the study area are expected to remain unchanged from existing conditions. However, the No-Action Alternative would not make use of the zoning changes to map Mandatory Inclusionary Housing (MIH) or facilitate the public realm improvements that would be implemented as part of the Proposed Project which would support several public policies.

Overall, neither the No-Action Alternative nor the Proposed Actions would result in significant adverse impacts to land use, zoning, or public policy, though the No-Action Alternative would not support the City's land-use policy to the extent that is supported by the Proposed Actions.

Socioeconomic Conditions

In the No-Action Alternative, no significant residential development is currently planned or in construction in the study area, therefore, the No-Action Alternative is assumed to be the same as the Existing Condition and would not affect socioeconomic conditions.

The current population of the socioeconomic study area is 33,636 per the 2020 Census, an increase of 3.1 percent over the 2010 population of 32,632 people. The population of both Brooklyn and New York City have increased over the same time period by 9.2 percent and 7.7 percent, respectively. As described in **Chapter 3, Socioeconomic Conditions**, while population within the study area has increased, wages have fallen as compared to 2010.

Neither the No-Action Alternative nor the Proposed Actions would be expected to have a significant adverse indirect residential displacement impact. Under the No-Action Alternative, there would be no on-site development and the church would continue to

operate on-site. However, given the trends experienced in the neighborhoods surrounding the study area, it is likely that rents within the study area would continue to increase under the No-Action Alternative. Demand for housing in the study area is expected to continue to increase given its relative affordability compared to the surrounding areas and its relatively convenient location and proximity to transit. The anticipated socioeconomic benefits of the Proposed Actions, including promoting the development of permanently affordable housing, would not be realized under the No-Action Alternative. Through increasing the overall supply of affordable housing, it is anticipated that the Proposed Actions would help to relieve displacement pressures. Unlike the Proposed Actions, the No-Action Alternative would not introduce any affordable housing to the proposed Project Area, and therefore, would not further the City's goal of increasing affordable housing.

Community Facilities and Services

Public Schools

In the No-Action Alternative, enrollment projections and new development within the community facility study area would result in a total of 2,682 elementary students and 1,358 intermediate students. As described in the community facilities chapter, two planned capacity changes to elementary schools would result in 3,457 seats for elementary schools in the study area, while the intermediate school capacity would stay the same as existing at 2,373 students. Overall, elementary schools in CSD 19, Sub-district 3 would operate within capacity, with a 77.6 percent utilization rate and 775 available seats. Intermediate schools would operate within capacity, with a 57.2 percent utilization rate and a surplus of 1,015 seats.

Early Childhood Programs

In the No-Action Alternative, planned or proposed No-Action development projects in the early childhood programs study area will introduce approximately 3,334 new affordable housing units by the analysis year, with an estimated 671 publicly funded childcare-eligible children. Therefore, under the No-Action Alternative, early childhood programs in the study area will operate at 126.49 percent utilization with a deficit of 426 seats under the No-Action Alternative.

The Brooklyn Developmental Center Mixed-Use Project DEIS identified the potential to result in significant adverse impacts on childcare services; potential mitigation measures, in the form of additional capacity, were identified. The provision of space for an estimated 290 slots within the site was identified as mitigation, but there are no known development plans or public funding commitments for publicly financed childcare slots in connection with the project at this time.

Libraries

Under the No-Action Alternative, the catchment area population would increase by 1,652 residents due to planned No-Action development, for a total population of 69,685. Assuming no increase in holdings in the No-Action condition, the holdings-per resident ratio for the library would decrease from 0.0731 in existing conditions to 0.0714 in the No-Action condition. The existing libraries will continue to serve the study area under this Alternative.

Open Space

Neither the No-Action Alternative nor the Proposed Actions would have any direct impacts on any open space resources as they would not physically alter or displace publicly accessible open space resources.

In the No-Action Alternative, no sizeable new development is anticipated in the study area that would result in a population increase, and no new publicly accessible open space planned. Therefore, the open space ratios would remain the same as under existing conditions, with 1.998 acres per 1,000 residents overall. In the No-Action Alternative the study area would be adequately served by passive open space, however there would be a deficit in active open space and total open space.

Compared with the Proposed Actions' residential study area ratios, the overall ratio under the No-Action Alternative would be slightly higher by 0.20 acres per 1,000 residents. However, the No-Action condition would not introduce 1.95 acres of new publicly accessible open space, approximately 36,000 sf (approximately 0.83 acres) of privately-owned passive open space, approximately 29,400 sf (approximately 0.67 acres) of privately-owned active open space including a playground for the childcare facility and residents and a recreational space to be located on top of the parking garage.

Shadows

No shadows would result from the No-Action Alternative as no new buildings would be constructed. As such, the No-Action Alternative would not have the potential to cast new shadows that would reach sunlight-sensitive open space resources.

Historic and Cultural Resources

The Landmarks Preservation Commission (LPC) has determined that the Development Site does not possess archaeological sensitivity. Therefore, like the Proposed Action, the No-Action Alternative would not affect archaeological resources. LPC has also indicated that there are no buildings or structures within the 400-foot study area or on the Development Site that have architectural significance. Therefore, under both the No-Action Alternative and the Proposed Actions, there will be no impacts to architectural resources.

Urban Design and Visual Resources

Like the Proposed Actions, the No-Action Alternative would not result in significant adverse impacts on urban design, view corridors, or visual resources. Under the No-Action Alternative, the Development Site is assumed to remain largely unchanged from existing conditions, which includes only the existing CCC and its accessory parking lots. Overall, the No-Action Alternative would not alter the arrangement, appearance, or functionality of the Development Site or study area such that the alteration would negatively affect a pedestrian's experience of the area, and as a result, the No-Action Alternative would not have significant urban design adverse impacts. Neither the Proposed Action nor the No-Action Alternative would eliminate any significant publicly accessible view corridors or completely block public views to any visual resources.

Unlike the Proposed Actions, the No-Action Alternative would not provide new development on accessory surface parking lots, provide new publicly accessible open space, or improve the urban design of the Development Site.

Overall, neither the Proposed Actions nor the No-Action Alternative would have significant adverse impacts on urban design or completely block public views to any visual resources that are not currently impeded by existing structures.

Natural Resources

Under both the No-Action Alternative and the Proposed Actions, the Project Area would continue to be characterized by highly urbanized and developed conditions, with largely unvegetated impervious surfaces occupying the vast majority of land cover. Accordingly, under both scenarios, natural resources, as defined in Chapter 11 of the *CEQR Technical Manual*, would continue to be absent from the Project Area.

Hazardous Materials

Absent the Proposed Project, it is assumed that the Development Site would remain in its existing condition, with only the CCC operational in the Development Site, surrounded by accessory parking. Under the future No-Action Alternative, remedial action on Block 4434, Lot 10 would not be completed under the NYSDEC BCP. As such, confirmed contaminants on Block 4434, Lot 10 would go unmitigated and remain in-place. Furthermore, the Applicant would not pursue enrollment into the NYSDEC BCP or NYC OER programs for the remediation of the remaining non-BCP portions of the Development Site. Furthermore, an (E) Designation for hazardous materials would not be applied to non-BCP portions of the Development Site (Block 4430, Lot 1; Block 4434, Lot 1). As such, potential subsurface contamination within these portions of the Development Site would go unmitigated without regulatory oversight.

Water and Sewer Infrastructure

Under the No-Action Alternative stormwater runoff, water demand, and wastewater generation calculations would remain unchanged from Existing Conditions.

As under the Proposed Actions, the No-Action Alternative would not have a significant incremental demand for water or a significant incremental increase in sanitary sewage generation, and therefore would not result in a significant adverse impact on the City's water and sewer infrastructure. Incremental increases would be within the capacity of the City's systems, and the impacts would not be considered significant or adverse.

Solid Waste and Sanitation Services

Under the No-Action Alternative, it is assumed that the Development Site would remain in its existing condition with only the CCC operational on the site, surrounded by accessory non-attended surface parking and vacant land serving as overflow parking. Solid waste would remain unchanged under the No-Action Alternative with approximately 1,690 pounds of solid waste generated per week. All waste will continue to be handled by a private carter.

Transportation

Under the No-Action Alternative, traffic, transit, and pedestrian volumes would increase due to background growth and development within the Development Site and study area. Similar to the Proposed Project, the vast majority of traffic movements analyzed would operate at acceptable levels of service under the No-Action Alternative. However, unlike the Proposed Project, the No-Action Alternative would not exceed the CEQR thresholds for significant adverse traffic impacts at nine intersections of the 13 intersections analyzed during the weekday AM peak hour, seven intersections during the weekday midday peak hour, nine intersections during the weekday PM peak hour, and seven intersections during the Saturday peak hour. A subset of seven intersections was analyzed for the Sunday peak hour (coinciding with the Christian Cultural Center church services) and No-Action Alternative would not result in significant traffic impacts at four intersections during this peak hour.

The Proposed Project would result in significant adverse pedestrian impacts at one pedestrian element during the weekday AM and midday peak hours, two pedestrian elements during the weekday PM peak hour, four pedestrian elements during the Saturday peak hour, and 12 pedestrian elements during the Sunday peak hour which would not occur under the No-Action Alternative. For subways, the Proposed Actions would result in significant impacts at the Glenwood Road fare control at the Rockaway Parkway L subway station during the weekday AM peak hour which would not occur under the No-Action Alternative. For buses, the Proposed Action would result in significant impacts to the bus routes listed below which would not occur under the No-Action Alternative.

- The B82 bus route in the westbound direction during the AM peak hour
- The B82 SBS bus route in the westbound direction during the AM peak hour, and in the eastbound direction during the PM peak hour
- The B83 bus route in both directions during both the AM and PM peak hours

Absent the Proposed Project, on-site parking supply and utilization would be similar to the existing conditions.

Air Quality

As described above, no development is expected to occur under the No-Action Alternative. As such, the No-Action Alternative would not result in a significant adverse mobile source or stationary source air quality impact. Furthermore, no industrial sources were found in a 400-foot radius of the Development Site and no large or major sources were identified within a 1,000-foot radius of the Development Site and therefore emissions from these sources are not anticipated in the No-Action Alternative.

Greenhouse Gas Emissions and Climate Change

As no new development would occur under the No-Action Alternative, there would be no significant changes to energy consumption and carbon dioxide equivalent (CO_2e) emissions per year. Neither the Proposed Project nor the No-Action Alternative would result in significant greenhouse gas emissions or climate change impacts.

Noise

Similar to the Proposed Actions, there would be an increase in background traffic under the No-Action condition which would result in an increase in ambient noise conditions. No-action noise conditions have been determined based on ambient noise measurements and proportional noise modeling. These increases in traffic would in general result in small changes in noise levels but, as outlined in **Chapter 16, Noise**, the maximum increase in L_{eq} noise levels would be 0.6 dBA compared to the existing condition. Changes of this magnitude would be barely perceptible. Absent the Proposed Actions, new noise-sensitive receptors would not be introduced at the Proposed Development Site. Therefore, the No-Action Alternative would not result in a significant adverse noise impact.

Public Health

Under the No-Action Alternative, there would be no new on-site development. As such, no unmitigated significant adverse impacts would occur in the areas of hazardous materials, air quality, noise, or construction, and thus there would be no significant adverse public health impacts associated under the No-Action Alternative.

Neighborhood Character

According to the *CEQR Technical Manual*, a proposed action could have a significant adverse neighborhood character impact if it would have the potential to affect the defining features of the neighborhood, either through the potential for a significant adverse impact in any relevant technical area, or through a combination of moderate effects in those technical areas. No new development would occur under the No-Action Alternative and the overall neighborhood character of the area would remain substantially the same as it is under existing conditions.

However, under the No-Action Alternative, the beneficial aspects of the development introduced by the Proposed Project – introduction of affordable housing units, community facilities, local retail, and new publicly accessible open space on underutilized parking lots– integrated into the urban fabric would not be realized nor contribute to the neighborhood character of the area.

Construction

The No-Action Alternative would not involve new construction.

No Unmitigated Significant Adverse Impact Alternative

According to the *CEQR Technical Manual*, when Proposed Actions would result in unmitigated significant adverse impacts, it may be appropriate to include an assessment of an alternative to the project that would not result in unmitigated impacts.

The No Unmitigated Significant Adverse Impact Alternative identifies those modifications to the Proposed Actions that would be required to eliminate all of the Proposed Actions' unmitigated significant adverse impacts. In order to eliminate all unmitigated significant

adverse impacts, the Proposed Actions would need to be so substantially modified that the project goals and objectives would not be realized or would be materially compromised.

Community Facilities and Services

Early Childhood Programs

As discussed in **Chapter 4, Community Facilities and Services**, the Proposed Actions would result in a significant adverse impact on publicly funded Early Childhood Programs according to the thresholds set forth by the *CEQR Technical Manual*. As discussed in **Chapter 20, Mitigation**, and **Chapter 22, Unavoidable Adverse Impacts** possible mitigation measures for this significant adverse impact will be developed as part of the Proposed Project in consultation with DOE and may include provision of suitable space on-site for a child care center, provision of a suitable location off-site and within a reasonable distance (at a rate affordable to DOE providers), or funding or making program or physical improvements to support adding capacity to existing facilities if determined feasible through consultation with DOE's Division of Early Childhood Education, or providing new early childhood programs within or near the Development Site.

To avoid the identified significant adverse impact to early childhood programs, the number of affordable dwelling units that could be developed would have to be reduced from 1,338 to 530, a reduction of 808 affordable units.[1] A substantial reduction in the number of affordable housing units developed in the Development Site would be less supportive of the goals and objectives of the Proposed Actions. Alternatively, taking into account the proposed mitigation from other developments in the study area, the provision of 128 early childhood slots under this alternative would avoid the unmitigated significant adverse impact to early childhood programs. The Proposed Project has allocated 12,320-gsf for a childcare facility within the Project Area. As discussed above, approximately 6,350 sf feet could be designated for publicly funded early childhood programming, which would fully mitigate the significant adverse impact if the designated spaces are tenanted by early childhood providers in consultation with NYCDOE.

Libraries

As discussed in **Chapter 4, Community Facilities and Services**, the Proposed Actions would result in a significant adverse impact on libraries according to the thresholds set forth by the *CEQR Technical Manual*. As discussed in **Chapter 20, Mitigation**, and **Chapter 22, Unavoidable Adverse Impacts** possible mitigation measures for this significant adverse impact will be developed in consultation with BPL and may include providing project residents with free internet access within lounge spaces in each building and computer lab/reading areas within the Proposed Project. Mitigation measures would rely upon the direction of BPL, and the ongoing monitoring that BPL must undertake to determine the appropriate mitigation measures.

To avoid the identified significant adverse impact to libraries the number of dwelling units that could be developed would have to be reduced from 2,050 to 1,486 to remain below the

[1] Note that this takes into account the Brooklyn Developmental Center Mitigation in the No-Action Condition. If the Brooklyn Developmental Center impact goes unmitigated, then the Proposed Project would have to reduce further to 450 units.

5 percent population increase threshold (a reduction of 564 units). A substantial reduction in the number of affordable housing units developed on the Development Site would be less supportive of the goals and objectives of the Proposed Actions. Alternatively, the proposed project could provide the necessary mitigations to ensure the project does not impair the delivery of library services in the study area.

Open Space

The Proposed Project would result in a temporary adverse impact to active open space ratios. Mitigation for the identified open space impact is being explored by the Applicant, DCP, and NYC Parks and will be refined between the DEIS and FEIS.

One of the goals of the Proposed Project is to advance the City's Housing New York 2.0 plan, which sets a goal of building or preserving 300,000 units of high-quality affordable housing in all five boroughs by 2026. An increment of up to 2,050 new housing units, all of which would be rent stabilized for a range of incomes 30 percent and 100 percent of the area median income (AMI), is anticipated to result from the Proposed Project. The Proposed Project would include approximately 200 units of affordable senior or supportive housing and up to 100 residential units offering affordable home ownership opportunities. To eliminate the impact (by reducing the change in active open space ratios to less than three percent), the number of residential units would need to be reduced to approximately 425 units. Such a reduction would not facilitate the provision of a substantial amount of affordable housing. Therefore, no reasonable alternative could be developed to avoid temporary adverse active open space impacts without substantially compromising the Proposed Project's stated goals.

Transportation

As discussed in **Chapter 20, Mitigation,** the Proposed Project would result in significant impacts to traffic, pedestrian, and subway station elements that could not be fully mitigated. Sensitivity analyses was conducted for each of these travel modes to determine the level of reduction in the development program to eliminate unmitigated significant transportation impacts. The analyses determined that any development increment would be expected to result in unmitigated significant adverse transportation impacts and therefore would not meet the project's goals of creating a sustainable, affordable neighborhood and address the economic, social, educational and cultural needs of the neighborhood.

The specifics for each travel mode analyzed is detailed below.

Traffic

The Proposed Project would result in significant adverse traffic impacts which could not be fully mitigated with standard traffic capacity improvement measures at six of the 13 intersections during the weekday AM peak hour, two intersections during the weekday midday peak hour, five intersections during the weekday PM peak hour (three of the five intersections could be partially mitigated), and four intersections during the Saturday peak hour. During the Sunday peak hour, impacts identified at four of the seven intersections analyzed could not be fully mitigated. A modest increase in traffic and pedestrians above No-Action condition levels would be expected to result in traffic impacts that could not be

mitigated. A sensitivity analysis was conducted at key intersections along Pennsylvania Avenue between Flatlands Avenue and Linden Boulevard and determined that during the weekday PM peak hour a vehicle increment of about eight percent of the Proposed Project (a development of no more than 165 residential units with no retail, community facility, or PAC) would result in a significant adverse traffic impact that could not be fully mitigated.

Pedestrians

The Proposed Project would result in significant pedestrian impacts that could not be mitigated at one pedestrian element during the weekday AM and midday peak hours, two pedestrian elements during the weekday PM peak hour, four pedestrian elements during the Saturday peak hour, and 12 pedestrian elements during the Sunday peak hour. As part of the Proposed Project, a 500-space parking garage would be constructed and replace the existing on-site surface parking, and some of the church-related trips that parked on-site would need to park on-street. Due to the prevailing church activities during the Sunday peak hour, the southeast corner of the intersection of Flatlands Avenue and Louisiana Avenue would operate at LOS F in the future absent the Proposed Actions and the increase in church-related pedestrian trips resulting from the changes in on-site parking conditions would result in unmitigated significant impacts at this corner. Therefore, any development increment would be expected to result in unmitigated significant adverse pedestrian impacts.

Subway

As discussed in **Chapter 20, Mitigation,** the Proposed Project would result in unmitigated significant adverse impacts at the Glenwood Road fare control element at the Rockaway Parkway L subway station during the AM peak hour. Measures to mitigate this impact could potentially include the construction of additional turnstiles. The practicability of implementing this measure, as well as measures to prevent prevalent fare evasion at this fare control area, will be evaluated in consultation with New York City Transit (NYCT) between the Draft EIS and Final EIS. Should measures to mitigate these impacts be determined to be impracticable, these significant impacts would be considered unmitigated in the Final EIS. A sensitivity analysis was conducted at the impacted subway station element and determined that the addition of six subway trips would result in a significant impact that could not be mitigated. The Proposed Actions' development increment would have to be reduced substantially – to approximately nine percent of the Proposed Project in order to reduce incremental trips to levels that would not result in significant adverse impacts at this subway station element.

Construction

Noise

As presented in **Chapter 20, Mitigation**, the Proposed Actions would result in significant adverse construction noise impacts which could not be fully mitigated at six buildings in the Project Area, including three existing buildings and three buildings that would be introduced by the Proposed Actions during the phased development.

Construction activities would adhere to the NYCDEP Noise Code in order to mitigate construction noise. Noise source and path control measures that would be implemented to

the extent feasible, practical, and safe. With the adherence to existing construction noise regulations and the implementation of a Construction Noise Mitigation Plan, as required by the New York City Noise Code, including an 8-foot construction noise barrier, construction noise would be reduced but would still exceed the thresholds for significant construction noise impact prior to mitigation. In order to eliminate all significant adverse noise impacts, use of the loudest construction equipment, such as drill rigs during the foundation phases of construction and concrete mixer trucks during the foundation and superstructure phases of construction, would have to be reduced or eliminated and other construction activities would need to be substantially limited so as to not occur adjacent to existing noise sensitive receptors or to occur for substantially shorter durations. These limitations would severely limit the Proposed Actions' goals and objective for the project. Therefore, no reasonable alternative could be developed to avoid the temporary unmitigated construction-period noise impact without substantially compromising the proposed projects' stated goals.