PARK AVENUE BROOKLYN REZONING
Chapter 17: Alternatives

A. INTRODUCTION

As described in the 2025 *City Environmental Quality Review (CEQR) Technical Manual*, alternatives selected for consideration in an environmental impact statement are generally those that are feasible and have the potential to reduce, eliminate, or avoid significant adverse impacts resulting from a proposed action while meeting some or all of the goals and objectives of that action. The purpose of an analysis of alternatives to a project is to provide the decision makers with the opportunity to consider practicable alternatives that are consistent with the project's purpose, and that could potentially reduce or eliminate significant adverse environmental impacts identified in the Environmental Impact Statement (EIS).

As described in **Chapter 1, "Project Description,"** the Proposed Actions would facilitate the development of nine Applicant-controlled Projected Development Sites within the Project Area as well as three additional Projected Development Sites not controlled by the Applicant. For CEQR analysis purposes, the Applicant's nine development sites and three non-Applicant sites are considered collectively and referred to as the total reasonable worst-case development scenario (RWCDS) for the Proposed Actions. Compared to No-Action conditions, the total RWCDS for the Proposed Actions would result in an incremental (net) increase of approximately 481 dwelling units (DUs), including 124 affordable units pursuant to the Mandatory Inclusionary Housing (MIH) program (assuming the Applicant's proposed Option 1), 201,838 gross square feet (gsf) of private school space, 28,505 gsf of local retail space, and net decreases of approximately 40,250 gsf of medical office space, 17,969 gsf of office space, 11,400 gsf of warehouse space, 5,000 gsf of house of worship space, as well as a net decrease of 100 parking spaces, by the analysis year of 2031.

This chapter considers in detail the following 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 (i.e., no zoning changes).
- A No Unmitigated Significant Adverse Impacts Alternative, which considers a development scenario that would not result in any identified significant, unmitigated adverse impacts.

B. PRINCIPAL CONCLUSIONS

No-Action Alternative

The No-Action Alternative examines future conditions in the Project Area but assumes the absence of the Proposed Actions (i.e., none of the discretionary approvals proposed as part of the Proposed Actions would be adopted). Under the No-Action Alternative, it is anticipated that new development would occur on two of the 12 Projected Development Sites identified under the

RWCDS. This would result in a net increase of 17,969 gsf of office space, 16,997 gsf of local retail space, and 40,250 gsf of medical office space, as well as 251 accessory parking spaces on the Projected Development Sites, compared to existing conditions. In total on the 12 Projected Development Sites, there would be two DUs, 99,090 gsf of community facility space, 69,619 gsf of commercial uses, 11,400 gsf of warehouse space, and 251 accessory parking spaces in the No-Action Alternative. The effects of the No-Action Alternative in comparison to those of the Proposed Actions are provided below.

The significant adverse impacts anticipated to occur related to open space, transportation, and construction noise that would occur with the Proposed Actions would not occur under the No-Action Alternative. However, the No-Action Alternative would not meet the goals of the Proposed Actions. The benefits expected to result from the Proposed Actions—including facilitating new community facility and commercial space and promoting affordable housing development by increasing residential density and establishing Mandatory Inclusionary Housing— would not be realized under this alternative, and the No-Action Alternative would fall short of the objectives of the Proposed Actions.

No Unmitigated Significant Adverse Impacts Alternative

The No Unmitigated Significant Adverse Impacts Alternative examines a scenario in which the density or other components of the Proposed Actions are modified to avoid the unmitigated significant adverse impacts associated with the Proposed Actions, which include impacts related to open space, transportation (traffic and pedestrians), and construction (noise). This alternative considers a development scenario that would not result in any significant adverse impacts that could not be fully mitigated. However, to eliminate all identified unmitigated significant adverse impacts, the Proposed Actions would have to be modified to a point where the principal goals and objectives of the Proposed Actions would not be fully realized.

C. NO-ACTION ALTERNATIVE

The No-Action Alternative examines future conditions within the Project Area but assumes the absence of the Proposed Actions. Under the No-Action Alternative, no change to zoning map or zoning text amendments, and MIH regulations would not apply to the Project Area. Conditions under this alternative are similar to the “Future without the Proposed Actions” described in the preceding chapters, which are compared in the following sections to conditions under the Proposed Actions.

Under the No-Action Alternative, it is anticipated that new development would occur on two of the 12 Projected Development Sites identified under the RWCDS. This would result in a net increase of 17,969 gsf of office space, 16,997 gsf of local retail space, and 40,250 gsf of medical office space, as well as 251 accessory parking spaces on the Projected Development Sites, compared to existing conditions. In total on the 12 Projected Development Sites, there would be two DUs, 99,090 gsf of community facility space, 69,619 gsf of commercial uses, 11,400 gsf of warehouse space, and 251 accessory parking spaces in the No-Action Alternative. The effects of the No-Action Alternative in comparison to those of the Proposed Actions are provided below.

Land Use, Zoning, and Public Policy

In the No-Action Alternative, based on existing zoning, it is anticipated that the Project Area would experience limited overall growth, with a modest increase in office, retail, and medical office uses.

In comparison to the future with the Proposed Actions, under the No-Action Alternative there would be no new residential or educational uses, and more underutilized sites would remain in the Project Area.

Unlike the Proposed Actions, the No-Action Alternative would not improve land use conditions in the Project Area because it would not introduce housing opportunities (including affordable housing) and new community facility and commercial uses to the Project Area. The No-Action Alternative would be less supportive of public policies articulated in OneNYC 2050, New York Works, Get Stuff Built, Housing Our Neighbors: A Blueprint for Housing and Homelessness, Block by Block, and Where We Live NYC Plan 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, commercial, and light industrial 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

Neither the No-Action Alternative nor the Proposed Actions would be expected to have a significant adverse impact on socioeconomic conditions. Similar to the Proposed Actions, the No-Action Alternative would not result in direct or indirect residential displacement or direct business displacement, and would not affect any specific industries.

Unlike the Proposed Actions, the No-Action Alternative would not result in any direct business displacement. Although the Proposed Actions could directly displace 19 existing businesses on the Projected Development Sites by 2031 and approximately 145 existing employees associated with those businesses, the 19 existing businesses and their employees do not represent a substantial proportion of businesses or employment within any given industry sector within the 0.5-mile study area. While these businesses provide value for the local economy, there are alternative sources of goods, services, and employment provided within the broader study area and elsewhere in Brooklyn. Therefore, the potential direct displacement of these businesses does not constitute a significant adverse impact on the socioeconomic conditions of the study area as defined by the 2025 *CEQR Technical Manual*, and neither the Proposed Actions nor the No-Action Alternative would result in significant adverse impacts related to direct business displacement.

Unlike the Proposed Actions however, the M1-1 and M1-2 zoning districts would remain under the No-Action Alternative, and no new schools or housing units would be constructed in the Project Area. As a result, the benefits of the Proposed Actions, including new private schools to meet increasing demand and permanently affordable housing pursuant to the City's MIH program, would not be realized under the No-Action Alternative.

Open Space

Similar to the Proposed Actions, the No-Action Alternative would not result in direct impacts on any open space resources. However, the No-Action Alternative would not introduce any new residents to the Project Area, and therefore, unlike the Proposed Actions, would not increase demand for open space resources within the study area and would not result in significant adverse indirect impacts to open space.

With regard to the open space ratios for the 0.5-mile study area, the No-Action Alternative would have slightly higher ratios with respect to overall open space, as well as passive and active open space. Under the No-Action Alternative, the total, active, and passive open space ratios for the study area would be 0.273, 0.205, and 0.068 acres per 1,000 residents, respectively (compared to 0.269, 0.202, and 0.067, respectively, under the Proposed Actions). As under the Proposed Actions, the total, active, and passive 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 0.5 acres of passive open space and 2.0 acres of active open space.

The open space ratios for the 0.5-mile study area under the No-Action Alternative would, therefore, generally ~~by~~ be slightly higher than those under the Proposed Actions, although open space ratios for the study area would be below the *CEQR Technical Manual* open space guidelines for open space adequacy and citywide planning goals under both the Proposed Actions and No-Action Alternative. However, unlike the Proposed Actions, the No-Action Alternative would not result in significant adverse indirect impacts to open space as no additional population would be introduced that could overburden existing open spaces in the residential open space study area.

Urban Design and Visual Resources

Like the Proposed Actions, the No-Action Alternative would not have significant adverse impacts on urban design and visual resources. Under the No-Action Alternative, all the existing buildings and structures within the Project Area would remain as under existing conditions, and two new buildings would be constructed on an as-of-right basis. Unlike the Proposed Actions however, the urban design benefits associated with the Proposed Actions – improving the pedestrian experience in the Project Area through the redevelopment of a largely underutilized area with mixed-use development containing active ground-floor uses such as retail, community facility and medical offices that would enliven the surrounding streetscapes – would not be realized under the No-Action Alternative.

Hazardous Materials

Like the Proposed Actions, the No-Action Alternative would not result in significant adverse hazardous materials impacts. Under the No-Action Alternative, minimal new development would occur within the Project Area. A greater amount of ground disturbance in areas where soil is potentially contaminated from hazardous materials would occur under the Proposed Actions, as compared with the No-Action Alternative, since most of the Projected Development Sites would be redeveloped under the Proposed Actions but not under the No-Action Alternative. However, development under the Proposed Actions would be conducted in accordance with the testing and remediation requirements required pursuant to the (E) designations that would be placed on the Projected and Potential Development Sites under the Proposed Actions. As such, the No-Action Alternative would involve less soil disturbance, but potentially the controls on its performance would not be as stringent as under the Proposed Actions. In either case, significant adverse impacts with respect to hazardous materials are not expected under either the Proposed Actions or the No-Action Alternative.

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 Actions, 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.

Transportation

As discussed below, unlike the Proposed Actions, the No-Action Alternative would not result in any significant adverse impacts with respect to transportation. Unlike the Proposed Actions, the No-Action Alternative would not result in the potential for significant adverse traffic impacts to four and nine intersections in the weekday AM and PM peak hours, respectively (no impacts are expected to occur in the weekday midday and Saturday peak hours). In addition, the Proposed Actions' significant adverse impacts to six sidewalks in one or more peak hours would not occur under the No-Action Alternative. Like the Proposed Actions, any shortfall in on-street or off-street public parking capacity under the No-Action Alternative is unlikely to be considered significant due to the magnitude of available alternative modes of transportation. Neither the No-Action Alternative nor the Proposed Actions would result in significant adverse impacts to subway stations, subway line haul conditions, or bus line services.

In the No-Action Alternative, traffic, parking, transit, and pedestrian demand in the study area would increase as a result of background growth, development that could occur pursuant to existing zoning (i.e., as-of-right development), and other development projects likely to occur within and in the vicinity of the Project Area.

Traffic

Independent of the Proposed Actions, traffic levels of service (LOS) at many locations in the study area would experience congested conditions in the future. Under the No-Action Alternative, a total of 11 intersections (all signalized) would have at least one congested lane group in one or more peak hours. Under the Proposed Actions a total of 11 intersections (all signalized) would also have at least one congested lane group in one or more peak hours. There would be no intersections with significant adverse traffic impacts under the No-Action Alternative compared to four and nine intersections in the weekday AM and PM peak hours, respectively (no impacts are expected to occur in the weekday midday and Saturday peak hours), under the Proposed Actions.

Transit

SUBWAY STATIONS

Under the No-Action Alternative, the two analyzed subway stations would experience an increase in demand as a result of background growth and future developments anticipated within and in the vicinity of the Project Area. All analyzed stairs fare arrays at Flushing Avenue and Myrtle-Willoughby stations would continue to operate at an acceptable LOS A or LOS B in both the AM and PM peak hours under both the No-Action Alternative and the Proposed Actions. Neither the No-Action Alternative nor the Proposed Actions would result in significant adverse impacts to subway stations.

SUBWAY LINE HAUL

Under the No-Action Alternative, subway trains serving stations in proximity to the Project Area would experience increased ridership through their maximum load points as a result of background growth and new development. As with the Proposed Actions, peak direction G trains under the No-Action Alternative are expected to be operating above capacity in both the AM and PM peak hours. As under the Proposed Actions, peak direction G train service would not be considered significantly adversely impacted under the No-Action Alternative based on *CEQR Technical Manual* criteria.

BUS

Under the No-Action Alternative, demands on local bus services operating in the vicinity of the Project Area are expected to increase compared to existing ridership as a result of background growth and new development. Existing levels of bus service are expected to be sufficient to provide adequate supply to meet the projected demand for the analyzed B44 SBS bus route in both the AM and PM peak hours under both the No-Action Alternative and the Proposed Actions. Neither the No-Action Alternative nor the Proposed Actions would result in significant adverse impacts to bus line service.

Pedestrians

Under the No-Action Alternative, pedestrian volumes along analyzed sidewalks, crosswalks and corner areas are expected to increase compared to existing levels as a result of background growth as well as demand from new development.

SIDEWALKS

Under the No-Action Alternative, all analyzed sidewalks are expected to operate at an acceptable LOS C or better in all evaluated peak hours, except for the north sidewalk along Flushing Avenue between Lee Avenue and Marcy Avenue which is expected to operate at a LOS F in the AM peak hour and LOS E in the PM peak hour. The Proposed Actions' significant adverse impacts to six of the 29 analyzed sidewalks in one or more peak hours would not occur under this alternative.

CROSSWALKS

Under the No-Action Alternative, all analyzed crosswalks are expected to operate at an acceptable LOS C or better in all evaluated peak hours. Neither the No-Action Alternative nor the Proposed Actions would result in significant adverse impacts at any of the 22 analyzed crosswalks.

CORNERS

Under the No-Action Alternative, all analyzed corner areas are expected to operate at an acceptable LOS C or better in all evaluated peak hours. Neither the No-Action Alternative nor the Proposed Actions would result in significant adverse impacts at any of the 48 analyzed corners.

Parking

Under the No-Action Alternative, it is anticipated that demand for public parking would increase due to new development and general background growth. Under both this alternative and the Proposed Actions, the increase in parking demand not accommodated on the Projected Development Sites would seek parking availability within a 0.25-mile radius of the Project Area. Like the Proposed Actions, any potential parking shortfalls would not be considered significant per the *CEQR Technical Manual* due to the magnitude of available alternative modes of transportation.

Air Quality

Mobile Sources

In the No-Action Alternative, emissions from traffic demand in the study area would be expected to increase because of background growth and other development projects likely to occur within and in the vicinity of the Project Area. As discussed in **Chapter 9, "Air Quality,"** 24-hour and annual $PM_{2.5}$ concentrations are predicted to be below the *de minimis* criteria and total concentrations would be below the NAAQS under both the No-Action Alternative and the Proposed Actions. Therefore, as under the Proposed Actions, significant adverse mobile source impacts are not anticipated under the No-Action Alternative.

Stationary Sources

As outlined in **Chapter 9**, while some development within the study area would occur under the No-Action Alternative, the Proposed Actions would result in more development and therefore the emissions from heat and hot water systems associated with the Proposed Actions would cumulatively be greater than the emissions from heat and hot water systems in the No-Action Alternative. However, the increase would be subject to the requirements to reduce fossil fuel usage established under Local Law 97 and Local Law 154. As under the Proposed Actions, significant adverse stationary source impacts are not anticipated under this alternative.

Greenhouse Gas Emissions and Climate Change

With less development than under the Proposed Actions, the No-Action Alternative would have less energy use and would therefore result in fewer carbon dioxide equivalent (CO_2e) emissions per year. Neither the Proposed Actions nor the No-Action Alternative would result in significant greenhouse gas (GHG) emission or climate change impacts.

Noise

Neither the Proposed Actions nor the No-Action Alternative would result in significant adverse noise impacts. In the No-Action Alternative, traffic volumes would increase in the area due to general background growth and trips associated with new development that would be independent of the Proposed Actions. These increases in traffic would in general result in small changes in noise levels compared to existing conditions but, at most locations and during most time periods, the increase in $L_{eq(1)}$ noise levels would be less than 3.0 dBA—an imperceptible change. Furthermore, as the No-Action Alternative would not include noise sources or receptors created by the Proposed Actions, it is not warranted to assess the potential for significant adverse noise impacts.

Public Health

Neither the Proposed Actions nor the No-Action Alternative would result in significant adverse public health impacts. Similar to the Proposed Actions, the No-Action Alternative would not result in any unmitigated significant adverse impacts in any of the technical areas related to public health. According to the *CEQR Technical Manual*, actions that do not result in unmitigated significant adverse impacts related to air quality, water quality, hazardous materials, or noise typically do not warrant a public health analysis. As the No-Action Alternative does not have the potential to cause any significant adverse impacts in those areas, it would not have any significant adverse impacts on public health.

Neighborhood Character

New development that could occur under the No-Action Alternative would only occur on two sites, as compared to 12 sites under the Proposed Actions. The overall neighborhood character of the Project Area would remain substantially the same as it is today in the No-Action Alternative. Like the Proposed Actions, the No-Action Alternative would not result in any significant adverse impacts to neighborhood character. However, the improvements to neighborhood character that would occur under the Proposed Actions – such as the introduction of affordable housing options, new community facility and commercial space – would not occur under the No-Action Alternative.

Construction

As the amount of new construction under the No-Action Alternative would be less as compared to the Proposed Actions, the No-Action Alternative would not generate as much temporary construction disruption. The No-Action Alternative would involve construction on only two of the Projected Development Sites within the Project Area (compared with 12 sites under the Proposed Actions), and thereby result in less construction-related noise and traffic than the Proposed Actions.

Overall, as the No-Action Alternative would involve substantially less construction, the duration would be shorter and the No-Action Alternative would also result in a shorter duration of construction-related noise and traffic than the Proposed Actions. Neither the Proposed Actions nor the No-Action Alternative would result in significant adverse construction impacts with respect to land use and neighborhood character, socioeconomic conditions, community facilities, open space, hazardous materials, transportation, or air quality. The No-Action Alternative would involve less soil disturbance, but potentially the controls on its performance would not be as stringent as under the Proposed Actions. The ~~No-Action~~ No-Action Alternative also would require less noise-intensive construction activities (e.g., demolition, excavation, and foundation construction work) than under the Proposed Actions, which would result in lower maximum construction noise levels for a shorter duration at receptors in the surrounding area. Consequently, maximum interior noise levels at these receptors are anticipated to be lower than those predicted for the Proposed Actions and therefore, would result in fewer or no significant adverse impacts as compared to the Proposed Actions.

Effects on Disadvantaged Communities

Since no new development would occur under the No-Action Alternative, this alternative would not have a disproportionate impact on disadvantaged communities or cause or increase a pollution burden. Like the existing conditions, under the No-Action Alternative, (E)-Designations would not be placed on the development sites to protect future development from potential impacts related to hazardous materials, air quality, or noise. Potential benefits of the Proposed Actions would be concentrated in a disadvantaged community with higher burdens and vulnerabilities, but would not occur under the No-Action Alternative.

D. NO UNMITIGATED SIGNIFICANT ADVERSE IMPACTS ALTERNATIVE

Based on the analyses presented in other chapters of this EIS, there is the potential for the Proposed Actions to result in a number of significant adverse impacts that are currently

unmitigated. Specifically, unmitigated impacts were identified with respect to indirect open space, transportation ~~(traffic and pedestrians),~~ and construction (noise). This alternative considers development that would not result in any significant adverse impacts that could not be fully mitigated. However, to eliminate all unmitigated significant adverse impacts, the Proposed Actions would have to be modified to a point where their principal goals and objectives would not be fully realized.

Open Space

As presented in **Chapter 4, "Open Space,"** the Proposed Actions are expected to introduce approximately 1,231 residents to the 0.5-mile residential study area under the RWCDS, compared to No-Action conditions. Given the anticipated decrease in the total, active, and passive open space ratios in the residential study area and the fact that open space ratios in the study area would remain below the City guideline ratios, the Proposed Actions would result in a significant adverse indirect impact to the total, active, and passive open space resources in the residential study area.

As discussed in **Chapter 16, "Mitigation,"** reconstruction of the handball courts at Taaffe Playground has been identified as a practicable and feasible measure to partially mitigate the indirect impact on open space. Although partial mitigation measures have been identified, the mitigation measure would not fully mitigate the open space impact and therefore, indirect impacts to open space would remain as an unavoidable adverse impact. To avoid the identified significant adverse residential study area open space impact, the number of residents that could be introduced on the Projected Development Sites would have to be reduced to less than 800 (or less than approximately 309 DUs). This would represent an approximately 36 percent reduction in the number of incremental DUs anticipated under the RWCDS. However, such a reduction would severely inhibit one of the primary goals of the Proposed Actions, to facilitate the development of housing, including affordable housing. Alternately, ~~this alternative~~under the No Unmitigated Significant Adverse Impacts Alternative, ~~would have to provide~~ approximately 6,098 square feet (sf) of additional publicly accessible open space (including a minimum of ~~1,742~~1,568 sf of passive open space and a minimum of ~~4,356~~4,530 sf of active open space) would have to be provided to the study area to avoid the unmitigated significant adverse open space impact.

Transportation

As presented in **Chapter 16, "Mitigation,"** the Proposed Actions would result in significant adverse traffic impacts at nine study area intersections during one or more analyzed peak hour; specifically, four lane groups at four intersections during the weekday AM peak hour and 10 lane groups at nine intersections during the weekday PM peak hour (no impacts are expected to occur in the weekday midday and Saturday peak hours). Implementation of traffic engineering improvements, such as signal timing changes, installation of new traffic signals, modifications to lane striping, and modifications to curbside parking regulations would provide mitigation for some of the anticipated traffic impacts. Specifically, the significant adverse impacts would be fully mitigated at all but one lane group at one intersection during the weekday PM peak hour.

Because of existing congestion at a number of these intersections, even a minimal increase in traffic would result in unmitigated impacts, especially traffic generated by Projected Development of Sites 2, 5, 6, and 8. Specifically, in the No-Action condition, a total of seven and eight intersections would have at least one congested lane group in the weekday AM and PM peak hours, respectively and a total of two and five intersections would have one or more lane groups operating at or over capacity during the same periods.

According to the *CEQR Technical Manual*, for a lane group that would operate at LOS E in the With-Action condition, a projected No-Action increase in delay of five or more seconds is considered a significant impact. For a lane group that would operate at LOS F in the With-Action condition, a projected No-Action increase in delay of four or more seconds is considered a significant impact. As such, small increases in incremental project-generated traffic volumes at some of the congested intersection approach movements would result in significant adverse impacts that could not be fully mitigated during the PM peak hour, and almost any new development (notably those at Projected Development Sites 2, 5, 6, and 8) in the Project Area could result in unmitigated traffic impacts. As the Applicant intends to develop Projected Development Sites 2, 6, and 8 with three new private schools, the elimination (or significant reduction in density) of those sites would severely undermine a key goal of the Proposed Actions, which is to meet the growing demand for additional schools in the neighborhood. Therefore, no reasonable alternative could be developed to completely avoid such impacts without substantially compromising the ~~Proposes~~ Proposed Actions' stated goals.

Construction

Noise

Construction activity for the ~~Proposed Project~~total RWCDS for the Proposed Actions is expected to follow the requirements of the NYC Noise Control Code. However, the implementation of these measures would not eliminate the identified temporary significant adverse construction noise impacts predicted to occur during hours when the loudest pieces of construction equipment are in use. In order to completely avoid significant adverse construction noise impacts, project-generated construction would have to be restricted in such a manner so as to occur neither on the same block nor within one block of any noise receptors, which would require elimination of the proposed rezoning in the vicinity of these sensitive receptors. This would severely limit achievable development density and the Proposed Actions' goals and objectives. Therefore, no reasonable alternative could be developed to avoid the temporary unmitigated construction-period noise impact without substantially compromising the Proposed ~~Project's~~ Actions' stated goals.

Summary

Overall, in order to eliminate all unmitigated significant adverse impacts, the Proposed Actions would have to be modified to a point where their principal goals and objectives would not be realized.