21.0 Alternatives

Introduction

As described in the 2021 *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 adverse impacts of a proposed action while meeting some or all of the goals and objectives of the action. As described in Chapter 1, "Project Description," the Atlantic Avenue Mixed-Use Plan consists of a series of land use actions (collectively, the "Proposed Actions") intended to facilitate the land use objectives described in Chapter 1. The Project Area consists of an approximately 21-block area in Brooklyn Community Districts (CD) 3 and 8.

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.

Principal Conclusions

No-Action Alternative

The No-Action Alternative examines future conditions within the Affected 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). In the No-Action Alternative, existing zoning would remain in the area affected by the Proposed Actions. It is anticipated that the Affected Area would experience growth under the No-Action Alternative by 2034. In the No-Action Alternative, it is anticipated that new development would occur on four of the 54 projected development sites identified under the Reasonable Worst-Case Development Scenario (RWCDS). In total on the 54 projected development sites, there would be 114,957 square feet (sf) of market-rate residential floor area (136 Dwelling Units [DU]), 161,466 sf of commercial uses, 237,371 sf of industrial uses,

267,686 sf of community facility uses, 64,471 sf of vacant space, and 209 accessory parking spaces in the 2034 No-Action Alternative. The significant adverse impacts related to Open Space, Shadows, Historic and Cultural Resources (architectural), Transportation, and Construction that would occur with the Proposed Actions would not occur with the No Action Alternative. Significant impacts are expected to occur for historic resources (archaeological) under the No Action Alternative.

In the No Action Alternative, there would be no change to zoning, Mandatory Inclusionary Housing (MIH), or the City Map within the Affected Area. The permanent affordable housing expected under the Proposed Actions would not be provided. In addition, as compared to the Proposed Actions, the benefits associated with improved economic activity, opportunities for high quality, and enhanced pedestrian conditions and vibrant commercial corridor along Atlantic Avenue would not to be realized.

No Unmitigated Significant Adverse Impacts Alternative

The No Unmitigated Significant Adverse Impacts Alternative examines a scenario in which the density and 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, Shadows, Historic and Cultural Resources (archaeological and architectural), Transportation (traffic, transit, and pedestrians), and Construction. 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 the principal goals and objectives of the Proposed Actions would not be fully realized.

No-Action Alternative

Introduction

The No-Action Alternative examines environmental conditions that would exist in the future analysis year (2034) without implementation of the Proposed Actions. In the No-Action Alternative, existing zoning would remain in the area affected by the Proposed Actions. In the No-Action Alternative, it is anticipated that new development would occur on four of the 54 projected development sites identified under the RWCDS. In total on the 54 projected development sites, there would be 114,957 sf of market-rate residential floor area (136 DUs), 161,466 sf of commercial uses, 237,371 sf of industrial uses, 267,686 sf of community facility uses, 64,471 sf of vacant space, and 209 accessory parking spaces in the 2034 No-Action Alternative.

Land Use, Zoning, and Public Policy

Like the Proposed Actions, the No-Action Alternative would not result in significant adverse impacts on land use, zoning, or public policy. Development within the Project Area would be consistent with existing uses in the area and is not expected to significantly affect the mix of existing land uses in the area. However, under the No- Action Alternative, fewer residential units would be constructed (approximately 127 DUs), with fewer affordable housing developed under this alternative (approximately 31 to 37 DUs pursuant to MIH depending on which MIH Option is utilized, at locations where MIH has been mapped as a result of previous Land Use applications). Changes to the existing zoning or public policy framework within the Project Area are not anticipated under the No-Action Alternative. The Project Area would continue to be zoned with M1-1, C6-2A, C6-3X, C6-3A, M1-4/R7A, R7D/C2-4, R6, R7-2, R7A/C2-4, R6B, and R6A districts as well as C2-4 commercial overlays.

Under the No-Action Alternative, it is expected that current land use trends and general development patterns will continue. These trends and patterns are characterized by a mix of uses, including mixed-use, commercial, light industrial, automotive, and storage uses, community facility, and some residential.

Under the No-Action Alternative, no changes to zoning are anticipated. Development is expected to occur in the Project Area under the existing residential, commercial, and industrial zoning at four projected development sites (Projected Development Sites 23, 24, 31, and 42).

Socioeconomic Conditions

Under the No-Action Alternative there would be less residential, community facility, and commercial development than what would occur under the Proposed Actions. Under the No-Action Alternative, development would occur on four of the 54 projected development sites. No-Action development on these sites would result in a net increase of 127 DU (31 to 37 DUs affordable pursuant to MIH) and 16,437 sf of local retail. The No-Action Alternative would result in a net decrease of 7,726 sf of office space.

Direct Residential Displacement

Neither the No-Action Alternative nor the Proposed Actions would result in significant adverse impacts due to direct residential displacement. No direct residential displacement would occur under the No-Action Alternative, while the Proposed Actions would displace an estimated 22 residents occupying nine DUs.

Direct Business Displacement

Like the Proposed Actions, the No-Action Alternative would not result in significant adverse impacts due to direct business displacement. Both the Proposed Actions and No-Action Alternative could result in some direct business displacement. The No-Action Alternative could result in the displacement of four sites, which would displace approximately 21 retail workers and 31 office workers. These displaced businesses do not provide a product or services that would no longer be available in the area, nor are they the subject of regulations or public policies aimed at protecting their business in that location.

Indirect Residential Displacement

The Proposed Actions nor the No-Action Alternative would result in significant adverse impacts to indirect residential displacement. Under the No-Action Alternative, four of the 54 projected development sites would be constructed with approximately 127 additional DUs (31 to 37 of which would be permanently affordable pursuant to MIH). Residents generated via these DUs would be less than the *CEQR Technical Manual* threshold of five percent of the existing study area population.

Under the No-Action Alternative, the existing trend of increasing average and median gross rents is expected to continue. Though housing would be created under the No-Action Alternative, this housing creation would only slow these trends to a degree. The anticipated socioeconomic benefits in creation of new affordable housing would not be realized under the No-Action Alternative.

Indirect Business Displacement

Neither the No-Action Alternative nor the Proposed Actions are expected to result in significant adverse impacts due to indirect business displacement. The No-Action Alternative would introduce approximately 16,437 gsf of new local retail space to the area. The secondary study area already has well-established commercial and residential markets, and neither the Proposed Actions nor the No-Action Alternative are expected to substantially alter commercial real estate trends in the area.

Adverse Effects on Specific Industries

Neither the No-Action Alternative nor the Proposed Actions would result in significant adverse impacts on specific industries. Under the No-Action Alternative, two sites with retail uses and one site with office uses would be displaced. Development under the No-Action Alternative on four of the 54 projected development sites would not affect any specific industry.

Community Facilities

The No-Action Alternative would introduce fewer residents to the study area as compared to the With-Action scenario and, therefore, would result in a smaller increase in demand on community facilities. Neither the With-Action scenario nor the No-Action Alternative would result in indirect impacts to public schools, child care facilities, library services, or police, fire, and emergency medical services.

Under the No-Action Alternative, there would be some new residential development on the projected development sites, with approximately 126 new residential DU being added to the Project Area (increment compared to existing conditions). Approximately 70-75 percent of the 126 residential DU are expected to be market-rate units and would generate substantially less demand for community facilities than the net 5,143 DUs generated by the Proposed Actions under the RWCDS.

Under the RWCDS, approximately 25-30 percent of units generated under No-Action conditions would be affordable. The amount of children eligible for publicly-funded child care would be

significantly less than the demand generated by the approximately 2,234 affordable units created as a result of the Proposed Actions. As such, it is anticipated that publicly funded child care centers would operate below capacity, and no significant adverse impacts on child care centers would occur under either the No-Action Alternative or the Proposed Actions.

Open Space

As the No-Action Alternative would introduce fewer residents and workers than the Proposed Actions, in terms of indirect effects, the open space ratios for both the non-residential (¼-mile) and residential (½-mile) study areas under the No-Action Alternative would, therefore, generally be higher than those under the Proposed Actions.

The open space ratios for the non-residential and residential study areas would be 0.297 per 1,000 workers and 0.26 acres per 1,000 residents, respectively. The open space ratio for the non-residential study area would exceed the City's goal of 0.150 acres per 1,000 workers. The residential study area open space ratio would be below the City's goal of 2.5 acres per 1,000 residents. The combined open space ratio for residents and workers (0.049 acres per 1,000 residents) would be below the goal of 0.44 acres of passive open space per 1,000 residents and workers.

As under the Proposed Actions, open space ratios for the residential study area would be below the *CEQR Technical Manual* open space guidelines for open space adequacy and citywide planning goals.

The No-Action Alternative would not result in indirect significant impacts to open space as the population introduced by as-of-right development on projected development sites would not overburden existing open spaces in the nonresidential and residential open space study areas.

Shadows

Unlike the Proposed Actions, the No-Action Alternative is not likely to result in any significant adverse shadows impacts. In the No-Action Alternative, projected development sites 23, 24, 31, and 42 would be redeveloped. These sites are not near the two sunlight-sensitive resources impacted by incremental shadows from the Proposed Actions (St. Bartholomew's Episcopal Church and Lefferts Place Block Association Community Garden). Similar to the Proposed Actions, no other sunlight-sensitive resources would be impacted by development under the No-Action Alternative.

Historic and Cultural Resources

The No-Action Alternative would result in significant adverse impacts to archaeological resources and no significant adverse impacts to architectural resources. The Proposed Actions would result in significant adverse impacts to archaeological and architectural resources.

Under the No-Action Alternative, four of the 54 projected development sites would be developed. Projected development sites 23, 31, and 42 were not identified as having any archaeological sensitivity. However, projected development site 24 would be redeveloped under the No-Action

Alternative and was identified as having archaeological sensitivity. Under the No-Action Alternative, the site would be redeveloped as-of-right and there would be no mechanism requiring further archaeological testing at the site. Therefore, the No-Action Alternative would result in significant adverse impacts to archaeological resources.

There are no historic resources located on these four sites to be developed under the No-Action Alternative nor are there any historic resources within 90-feet of these sites. Therefore, the construction of these projected development sites under the No-Action Alternative would not result in any significant adverse direct or indirect impacts to architectural resources.

Urban Design and Visual Resources

Similar to the Proposed Actions, the No-Action Alternative would not result in significant adverse impacts related to urban design and visual resources. As noted in the *CEQR Technical Manual*, as-of-right development does not warrant an urban design assessment. Development occurring under the No-Action Alternative Therefore, similar to the Proposed Actions, the No-Action Alternative would not have any adverse urban design impacts.

Hazardous Materials

The No-Action Alternative, like the Proposed Actions, would involve building construction, and re-occupation. However, construction on new buildings for as-of-right uses under the current zoning may occur without regulatory oversight such that environmental conditions of these sites are not addressed, and residual contamination could be encountered by construction workers or the general public without their knowledge. It is assumed that all construction and required removal or handling of hazardous materials would be conducted in accordance with applicable state and federal requirements, thereby minimizing the potential for exposure.

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 some 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 or comparable measure 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.

Water and Sewer Infrastructure

Compared with the Proposed Actions, the No-Action Alternative would generate less demand on the City's water supply and wastewater treatment infrastructure. However, 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. 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 (NYCDEP) site connection application process for new buildings.

Solid Waste and Sanitation

While solid waste generated by the projected development sites would increase under both the No-Action Alternative and Proposed Actions, the No-Action Alternative would generate less demand on New York City's solid waste services and sanitation services. However, 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 Proposed Actions nor the No-Action Alternative would result in significant adverse impacts with respect to the transmission or generation of energy. Like the Proposed Actions, the No-Action Alternative would generate increased demands on New York City's energy services, but the demand generated under the No-Action Alternative would generate increased demands on New York City's energy services, but the demand generated under the No-Action Alterative would be considerably less than for the Proposed Actions. Under both the Proposed Actions and the No-Action Alternative, the annual increase in demand would represent a negligible amount of the City's forecasted annual energy requirements for 2034.

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 21, 21, 25, and 25 intersections in the weekday AM, midday and PM, and Saturday peak hours, respectively. The Proposed Actions' significant adverse impacts to line haul conditions on the northbound C train service in the AM peak hour and the southbound C train service in the PM peak hour would not occur under the No Action Alternative. Furthermore, the Proposed Actions' significant adverse impacts to 10~~2~~ sidewalks, four corners, and four crosswalks in one or more peak hours would not occur under the No Action Alternative. Like the Proposed Actions, as the Proposed Actions' RWCDS does not include any on-site parking on projected development sites, nor any new off-street public parking, the total increase in parking demand under the Proposed Actions' RWCDS would not be accommodated on-site and excess demand would seek parking availability within a quarter-mile radius of the Project Area.

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, 24 intersections (23 signalized and one unsignalized) would have at least one congested lane group in one or more peak hours in the No-Action condition; this is compared with a total of 27 intersections (24 signalized and three unsignalized) with at least one congested lane group in one or more peak hours under the Proposed Actions. There would be no intersections with significant

adverse traffic impacts under the No Action Alternative compared with 21, 21, 25, and 25 impacted intersections during the weekday AM, midday and PM, and Saturday peak hours, respectively, under the Proposed Actions.

Transit

Subway Stations

Under the No Action Alternative, all three 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. Like the Proposed Actions, no pedestrian elements (stairs, escalators and fare arrays) at any of these stations would experience significant adverse impacts under the No Action Alternative.

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. No subway route would experience significant adverse line haul impacts under this alternative. By comparison, the northbound C service and the southbound C service would be significantly adversely impacted by the Proposed Actions in the AM and PM peak hours, respectively.

Pedestrians

Under the No Action Alternative, pedestrian volumes along analyzed sidewalks, crosswalks and corner areas are expected to increase compared with 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 projected to operate at an acceptable LOS C or better in all peak hours, with the exception of three sidewalks. The Proposed Actions' significant adverse impacts to 11~~2~~ of the 62 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 B or better in all peak hours. The Proposed Actions' significant adverse impacts to four of the 39 analyzed crosswalks would not occur under this alternative.

Corners

Under the No-Action Alternative all analyzed corner areas are expected to operate at an uncongested LOS C in all peak hours. The Proposed Actions' significant adverse impacts to four of the 68 analyzed corners would not occur under this alternative.

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-site would seek parking availability within a quarter-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 Source

Emissions from traffic in the area would increase under the No-Action Alternative as a result of background growth and as-of-right development.

Stationary Source

As discussed in **Chapter 14, Air Quality,** some development would occur on projected development sites under the No-Action Alternative. Development under the No-Action Alternative would be less than under the With-Action condition. Emissions from heat and hot water systems would be lower under the No-Action Alternative than under the With-Action condition. However, unlike the With-Action condition, the as-of-right development on four of the 54 projected development sites would not have an environmental assessment of air quality exposure as conducted for the Proposed Actions. As-of-right development in the Project Area would not be subject to any air quality E-designations, which would be designed to ensure that there would be no significant adverse air quality impacts at nearby receptor locations.

Greenhouse Gas Emissions and Climate Change

Like the Proposed Actions, the No-Action Alternative would not result in significant adverse impacts to greenhouse gas emissions or climate change. Emissions from additional vehicle trips and heating and cooling of new developments would be less under the No-Action Alternative than under the Proposed Actions. The resilience challenges associated with sea level rise, the future increase in potential severe storm levels, and the City's response to these challenges would be the same as those described for the Proposed Actions. The Project Area is not located in the 100-year or 500-year floodplains.

Noise

Under the No-Action Alternative, traffic volumes in the Project Area and surrounding area would increase due to general background growth and trips generated by development not facilitated by the Proposed Actions. Increase in traffic generated by background growth/other development in the area would be less than 3.0 dBA compared to existing conditions. As the No-Action Alternative would not constitute receptors created by the Proposed Actions, it is not warranted to assess if there would be the potential of any significant adverse noise impacts.

Public Health

Under the No-Action Alternative, no unmitigated significant adverse impacts would occur related to hazardous materials, air quality, or construction. Therefore, the No-Action Alternative would not result in any significant adverse impacts to public health.

Neighborhood Character

Like the Proposed Actions, the No-Action Alternative would not result in any significant adverse impacts to neighborhood character. New development that could occur under the No-Action Alternative would only occur on four sites, as compared to 54 sites under the Proposed Actions. The overall neighborhood character of the area would remain substantially the same as it is today in the No-Action Alternative.

Construction

The amount of construction under the No-Action Alternative would be less compared to the Proposed Actions. The No-Action Alternative would result in shorter durations of construction related-noise, air quality, and traffic disruptions compared to the Proposed Actions.

No Unmitigated Significant Adverse Impacts Alternative

The No Unmitigated Significant Adverse Impacts Alternative demonstrates the measures that would need to be taken to eliminate the Proposed Action's potential unmitigated impacts to Open Space, Shadows, Historic and Cultural Resources, Transportation, and Construction. This alternative considers development that would not result in any unmitigated significant adverse impacts. The No Unmitigated Significant Adverse Impacts Alternative would modify the Proposed Actions to the point that the goals and objectives of the project would not be fully achieved.

Open Space

The Proposed Actions would result in significant adverse indirect impacts to open space in the residential ½-mile study area due to the decreases in total, active, and passive open space ratios

As discussed in **Chapter 20, Mitigation**, possible measures that could mitigate the Proposed Actions' indirect significant adverse impact to open space in the resident study area may include: expanding existing parks, creating new open space on publicly owned land, encourage owners of privately-owned sites to create new open space as part of their redevelopment, making playgrounds accessible to the community after school hours through the Schoolyards to Playgrounds program, establishing new pedestrian plazas in streets through the City's Plaza program, and/or improving existing parks to allow for more diverse programming. ~~These potential mitigation measures are currently being explored in coordination with the lead agency, DCP, and the New York City Department of Parks and Recreation and will be refined between the Draft and Final Environmental Impact Statement (EIS).~~

As discussed in **Chapter 25, Conceptual Analysis**, as part of the Proposed Actions, a zoning text amendment is proposed which would create a zoning authorization that would allow for the

bonus of floor area and height modification with the provision of publicly accessible open space on zoning lots zoned R9 larger than 25,000 sf.

Though these potential mitigation measures may increase publicly accessible open space in the residential ½-mile study area, opportunities to create new open space in sufficient amounts to fully mitigate an indirect impact are limited. Therefore, the indirect significant adverse impact would not be fully mitigated, and an unavoidable significant adverse indirect open space impact would occur.

To avoid an unmitigated significant adverse indirect impact to open space in the residential ½-mile study area, the Project Area would either need an additional three acres of open space or the number of additional residential units generated by the Proposed Actions would need to be reduced to 750 DUs (approximately 14 percent of the total incremental units generated under the Proposed Actions). A reduction of this magnitude would severely inhibit one of the primary goals of the Proposed Actions, to facilitate the development of housing, including affordable housing and would not meet the Purpose and Need of the Proposed Actions.

Shadows

As presented in **Chapter 6, Shadows**, the Proposed Actions would result in unmitigated significant adverse impacts to St. Bartholomew's Episcopal Church and Lefferts Place Block Association Garden.

To eliminate the impact to St. Bartholomew's Episcopal Church, projected development site 20 would need to be excluded from the Project Area. Due to the site's proximity and location relative to the house of worship, any new development on that site is likely to impact the house of worship's stained-glass windows along its western façade.

To eliminate the impact to Lefferts Place Block Association Garden, projected development site 13 and potential development site G would need to be excluded from the Project Area. These sites are both located directly south of the garden. Therefore, any development on these sites beyond what currently exists at these sites is likely to impact the garden. Since the DEIS, additional sensitivity assessment was conducted to determine the modifications to the proposed zoning district on projected development site 13 that would be necessary to substantially reduce the incremental shadows to the Lefferts Place Block Association Garden to reduce or eliminate the potential for significant adverse impacts. The zoning would need to be reduced to a magnitude that substantially reduces the capacity of the site to produce housing and would inhibit the achievement of the goals and objectives of the Proposed Actions.

Under the Proposed Actions, projected development sites 13 and 20 are expected to result in an additional 347 DUs (approximately seven percent of the total number of incremental units), 87 to 104 of which would be permanently affordable pursuant to MIH, 2,270 sf of community facility space, 25,185 sf of local retail.

Reducing the development potential of these sites would be inconsistent with the goals of the Proposed Actions of locating higher bulk along the Project Area's primary corridors (i.e., Atlantic Avenue).

Historic Resources

The Proposed Actions would result in direct and indirect significant adverse impacts to both archaeological and architectural resources.

Archaeological Resources

Unmitigated significant adverse impacts to archaeological resources would occur at projected development sites 9, 10, 11, 21, 22, 24, 27, 28 as there would be no mechanism to require further testing at these sites. To eliminate the archaeological impact, either a mechanism to require further testing at these sites would be required or these eight projected development sites would need to be excluded from the Project Area. Removal of these sites from the Proposed Actions would eliminate the possibility for a significant adverse impact as part of the Proposed Actions, it would not eliminate the possibility of as-of-right development disturbing potential archaeological resources on these sites. Exclusion of these sites would reduce the amount of new incremental housing by approximately 20 percent, which would hinder the primary goals and objectives of the project to develop housing, including affordable housing.

Architectural Resources

The construction of projected development site 52 would result in an unmitigated direct significant adverse impact to the S/NR-eligible Olivet Church. Development at nine projected and potential development sites under the Proposed Actions could potentially result in construction-related impacts to seven S/NR-Eligible/LPC-Eligible historic resources, one of which is a historic district as these sites are within 90-feet of these resources.

These impacts to S/NR-Eligible/LPC-Eligible would be eliminated if projected development sites 20, 47, 52 were excluded from the Project Area. Removing these sites from the Proposed Actions would hinder the goals of the project and would result in less housing and affordable housing and would leave portions of Atlantic Avenue underbuilt relative to future With-Action conditions.

Transportation

As presented in **Chapter 20, Mitigation,** the Proposed Actions would result in significant adverse traffic impacts at 27 study area intersections during one or more analyzed peak hours; specifically, 21 intersections during the weekday AM peak hour, 21 intersections during the weekday midday peak hour, 25 intersections during the weekday PM peak hour, and 25 intersections during the Saturday peak hour. Implementation of traffic engineering improvements, such as signal timing changes, the installation of new traffic signals, and modifications to lane striping and curbside parking regulations would provide mitigation for many of the anticipated traffic impacts. Specifically, the significant adverse impacts would be fully mitigated at ~~13~~ 10 lane groups in the weekday AM peak hour, ~~13~~ 11 lane groups in the midday, ~~12~~ 11 lane groups in the PM, and 10~~11~~ lane groups in the Saturday peak hour. Intersections where all impacts would be fully mitigated

would total 56, 911, 9, and 76 during these same periods, respectively. In total, impacts to one or more lane group would remain unmitigated in one or more peak hours at 22 21 intersections.

Because of congestion under the Existing and No Action conditions at a number of these intersections, even a minimal increase in traffic would result in unmitigated impacts. Specifically, in the No Action condition, a total of 24 intersections would have at least one congested lane group in one or more peak hours. A total of fourteen intersections would have one or more lane groups operating at or over capacity (v/c > 1.0) in the weekday AM peak hour, eleven in the midday, 17 in the PM, and 18 in the Saturday peak hour. According to the *CEQR Technical Manual*, for a lane group that would operate at LOS F in the No Action condition, a projected delay of four or more seconds is considered a significant impact. As such, small increases in incremental With Action traffic volumes at some of the congested intersection approach movements would result in significant adverse impacts that could not be fully mitigated during one or more analysis peak hours, and almost any new development in the Project Area could result in unmitigated traffic impacts.

Northbound and southbound C trains in the AM and PM peak hours, respectively, would be considered significantly adversely impacted by the Proposed Actions based on *CEQR Technical Manual* criteria. In the absence of the additional frequencies or other mitigation measures, the impact to northbound and southbound C services during the AM and PM peak hours, respectively, would remain unmitigated.

The Proposed Actions would result in significant adverse impacts to 102 sidewalks, four crosswalks, and four corners. Mitigation measures could not be identified at seven sidewalks, one two crosswalks, and four corners.

No reasonable alternative could be developed to completely avoid these Transportation impacts without significantly reducing the scale of the Proposed Actions which would substantially compromise the Proposed Actions' stated goals.

Construction

Air Quality

As presented in **Chapter 19, Construction,** $PM_{2.5}$ would be below its NAAQS for all analyzed Sites and would exceed annual *de minimis* threshold at projected development sites 10 and 14. The exceedance of the de minimis threshold would be considered a significant adverse air quality impact.

In order to completely avoid significant adverse construction noise impacts, project-generated construction at projected development sites 10 and 14 would have to be restricted in such a manner to not occur on these sites by the project's 2034 build year. This would reduce the achievable development density and the Proposed Actions' goals and objectives.

Noise

As discussed in **Chapter 19, Construction,** noise level increases exceeding the construction noise impact criteria would occur at several locations throughout the Project Area (refer to **Figure 19-3**).

Construction activities would follow the requirements of the NYC Noise Control Code for construction noise control measures. Specific noise control measures would be utilized in noise mitigation plans required under the NYC Noise Control Code. The implementation of measures included in the NYC Noise Control Code would not eliminate the 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 at projected development sites 6, 9, 10, 14, 15, 20, 22, 45, 54, and 55 would have to be restricted in such a manner so as to not occur on the same block as, or within one to two blocks from, existing sensitive receptors, which would require elimination of the Proposed Actions in the vicinity of these sensitive receptors. This would severely limit achievable development density and the Proposed Actions' goals and objectives.