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Innovative Urban Village

Final Scope of Work for Preparation of a Draft Environmental Impact Statement

LEAD AGENCY

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Final Scope of Work

Section 1: Introduction

This ~~Draft~~Final Scope of Work (FSOW) outlines the technical areas to be analyzed in the preparation of an Environmental Impact Statement (EIS) for the proposed large-scale development of a site located in the East New York neighborhood of Brooklyn (see **Figure 1**). A portion of the site is currently occupied by the 92,784-gross square foot (gsf) Christian Cultural Center (CCC) facility, which would remain on the site as part of the ~~proposed project~~Proposed Project.

The Applicant, Innovative Urban Living, LLC, is seeking discretionary approvals from the City Planning Commission to facilitate the proposed development. These approvals include a zoning map amendment, zoning text amendments, large-scale general development special permits, ~~a special permit to reduce required accessory residential parking,~~ and a special permit for a public parking garage. More information on the required approvals is provided in **Section 4, ~~"~~Required Approvals~~."~~**.

The ~~proposed project~~Proposed Project is anticipated to contain approximately 2.~~4~~2 million gsf of development[1] to be constructed in phases over 10 years as ~~13~~10 new buildings ranging from approximately ~~2~~two to ~~17~~15 stories, with approximately 1,~~980,000~~645,820 gsf ~~for~~of residential space; ~~82,000~~approximately 65,670 gsf ~~for~~of retail space; ~~10,000~~approximately 12,320 gsf of day ~~-~~care space; ~~55,000 gsf of educational/school space; a~~ approximately 16,500-gsf ~~performing arts/cultural center; 170,000~~of space dedicated to a Performing Arts Center (PAC); approximately 343,244 gsf of parking, including 145,684 gsf of ~~structured~~below grade parking and a 197,560-gsf public parking garage that would accommodate accessory parking for the ~~existing CCC facility~~retail and ~~other~~ community facility uses; and ~~a 15,000~~an approximately 14,100-gsf trade school ~~within~~to be located in one wing of the ~~same~~existing CCC building ~~as the structured parking.~~(thereby reclassifying approximately 14,100 gsf of existing community facility space to commercial space). The existing ~~93,000~~92,784-gsf CCC facility would also remain on the site~~.~~, but the size would be reduced to approximately 78,684 gsf when the 14,100 gsf trade school is completed. The ~~applicant~~Applicant intends to develop a total of approximately 2,~~118~~050 income-based residential units, composed of approximately 1,~~825~~538 affordable housing units, up to ~~267~~200 units of affordable senior or supportive housing, and ~~approximately 26~~up to 100 residential units offering affordable home ownership opportunities, including affordable condominiums and approximately 30 maisonettes under affordable ownership that would be attached to up to four of the residential buildings. The ~~development is~~Proposed Project would also ~~expected to~~ include approximately ~~81,000~~84,950 sf of publicly accessible open

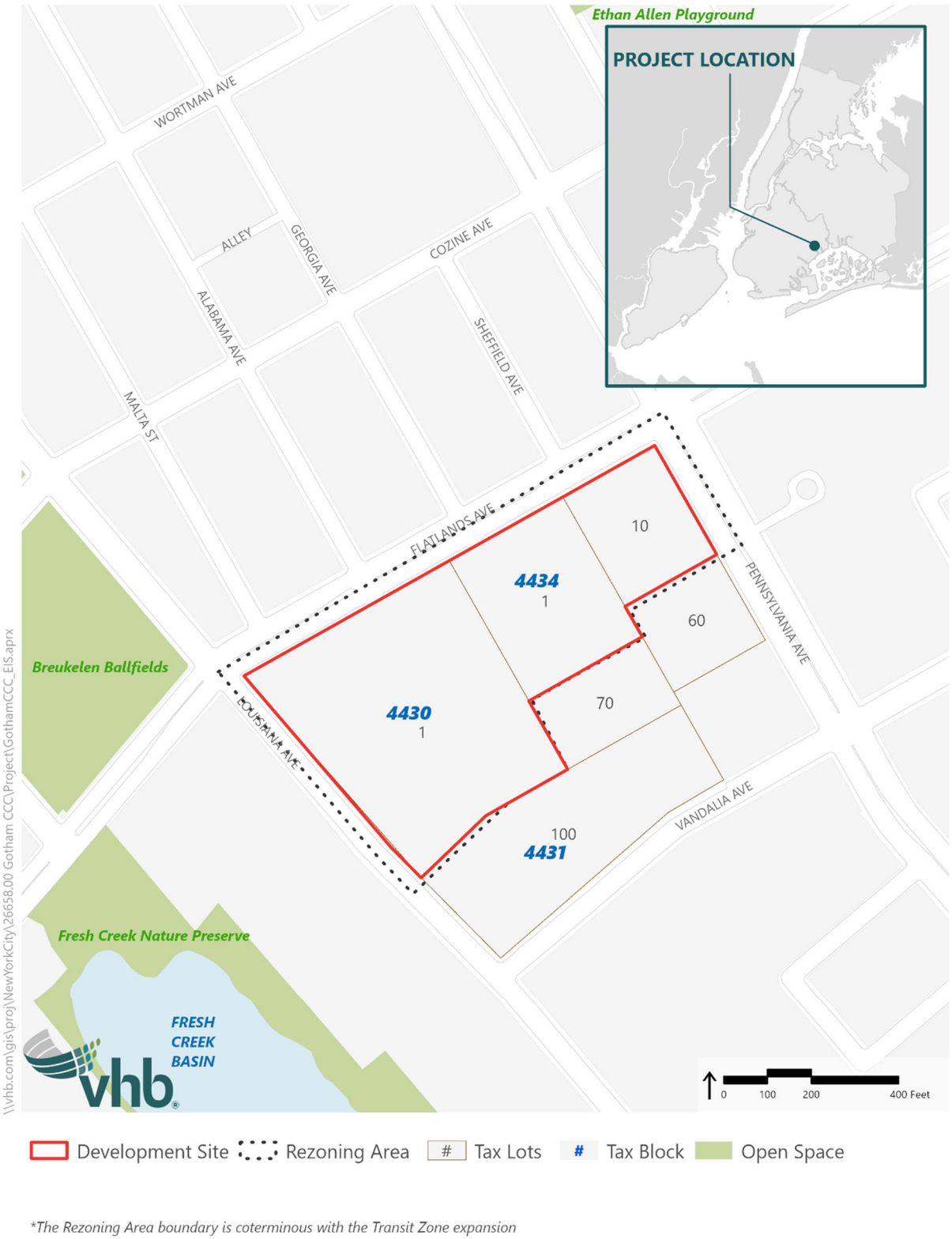
[1] Square footage is rounded in this introductory section for ease of reference; tables in subsequent sections contain actual proposed square footage.

space~~.~~, approximately 36,000 sf of private passive open space, and approximately 29,400 sf of private active open space.[2]

The ~~proposed actions~~Proposed Actions are subject to City Environmental Quality Review (CEQR). The New York City Department of City Planning (DCP), acting on behalf of the City Planning Commission (CPC), is the lead agency for the environmental review. Based on the Environmental Assessment Statement (EAS) dated January 16, 2020, DCP has issued a Positive Declaration declaring that the ~~proposed actions~~Proposed Actions have the potential to result in significant adverse environmental impacts and requiring the preparation of an EIS.

[2] The proposed active open space areas would be managed by the Applicant. The rooftop recreation space, considered private active open space, would be accessible to the public with the exception of peak church parking demand periods on Tuesday evenings and Sundays and within the hours posted per the public access agreement (PAA). The playground would be available to the public outside of day care operating hours.

Figure 1 Site Location Map



**The Rezoning Area boundary is coterminous with the Transit Zone expansion*

Section 2: City Environmental Quality Review (CEQR) and Scoping

The purpose of the scoping process is to focus the EIS on potentially significant adverse environmental impacts by ensuring that relevant issues are identified as early as possible and studied properly, and to eliminate consideration of those impacts that are irrelevant and not significant. In addition, it allows the public, agencies, and other interested parties the opportunity to help shape the EIS by raising relevant issues regarding the focus and appropriate methods of study. The draft scoping document sets forth the analysis areas proposed to be covered in the EIS and the methodologies that are proposed to perform these analyses. During the scoping period, those interested in reviewing the Draft Scope of Work (~~Draft Scope~~DSOW) may do so and give their comments to the Lead Agency.

The public, interested agencies, Community Boards, and elected officials ~~are~~were invited to comment on the ~~Draft Scope~~DSOW, either in writing or orally, at a public scoping meeting ~~to be~~that was held Tuesday, March 3, 2020 at 3:30 PM at the ~~Christian Cultural Center~~CCC, 12020 Flatlands Avenue, Brooklyn, NY 11207. Written comments on the ~~Draft Scope of Work will be~~DSOW were accepted by the lead agency through close of business March 13, 2020. ~~The Final Scope of Work will incorporate~~The FSOW incorporates all relevant comments made on the ~~Draft Scope~~DSOW and the Draft EIS (DEIS) ~~will be~~was prepared in accordance with the ~~Final Scope~~FSOW.

Once the DEIS is determined by the Lead Agency to be complete, the document will be made available for public review and comment. A public hearing will be held on the DEIS in conjunction with the CPC hearing on the land use application to afford all interested parties the opportunity to submit oral and written comments. The record will remain open for 10 days after the public hearing to allow additional written comments on the DEIS. At the close of the public review period, a Final EIS (FEIS) will be prepared that will respond to all substantive comments made on the DEIS and incorporate any necessary revisions. The FEIS will then be used by the lead agency in making the required environmental findings, which are used as a basis for deciding whether to approve the requested discretionary actions, with or without modifications. According to SEQRA Part 617.11(d), these findings must:

1. consider the relevant environmental impacts, facts and conclusions disclosed in the final EIS;
2. weigh and balance relevant environmental impacts with social, economic and other considerations;
3. provide a rationale for the agency's decision;
4. certify that the requirements of this Part have been met; and
5. certify that consistent with social, economic and other essential considerations from among the reasonable alternatives available, the action is one that avoids or minimizes adverse environmental impacts to the maximum extent practicable, and that adverse environmental impacts will be avoided or minimized to the maximum extent practicable by incorporating as conditions to the decision those mitigative measures that were identified as practicable.

Section 3: ~~Project~~ Rezoning Area and Context

~~Project Area~~

Development Site

The ~~development site~~Development Site consists of Block 4430, Lot 1~~; Block 4431, Lots 1 and 200; Block 4432, Lot 1;~~ and Block 4434, ~~Lot~~Lots 1~~;~~ and ~~a demapped portion of Alabama Avenue~~10[3] in the East New York neighborhood of Brooklyn, Community District 5. The site is approximately 449,653 sf (10.32 acres) with 466 feet of frontage along Louisiana Avenue to the west, 1,053 feet of frontage on Flatlands Avenue to the north, and 291 feet of frontage on Pennsylvania Avenue to the east. The two-story, 92,784 gsf ~~Christian Cultural Center (~~CCC~~)~~ ~~—~~ a large, non-denominational house of worship built in 1997~~—~~ sits on the western portion of the ~~development site~~Development Site and is surrounded by a surface parking~~.~~ lot of approximately 385 striped accessory parking spaces. It is accessed via a curb cut along Flatlands Avenue immediately opposite of Alabama Avenue and via two existing curb cuts along Louisiana Avenue. The eastern half of the ~~development site~~Development Site is unpaved and used for overflow parking during church services. **Figure 1**~~The site is located in an R5 zoning district.~~ **~~Figure 1-1~~** shows the site location.

~~Project~~The Development Site is currently mapped within an R5 zoning district. R5 districts are widely mapped in certain neighborhoods in the outer reaches of Brooklyn, Queens, and the Bronx, and permit residential and community facility uses listed in Use Groups 1 through 4. Commercial and manufacturing uses are not allowed in absence of a commercial overlay. R5 districts allow for a maximum FAR of 1.25 for most residential uses and 2.0 for community facility uses.

Overall, approximately 562,067.16 sf of residential floor area is permitted at the Development Site under the present zoning controls, and 899,307.46 sf is allowed for community facility uses. Lot coverage is limited to 55 percent for residential uses and limited to 60 percent for corner lots and 55 percent for interior lots for community facility uses.

~~Project~~ Rezoning Area

The Rezoning Area contains the Development Site as well as *de minimis* portions of the north side of Block 4434, Lot 60 and Block 4431, Lots 70 and 100. The Rezoning Area is located within East New York in Brooklyn Community District 5. The East New York neighborhood extends to the north, east, and south and the Canarsie neighborhood is located to the southwest and west. Louisiana Avenue comprises the eastern boundary of Brooklyn Community District 18.

Flatlands Avenue and Pennsylvania Avenue are the two major thoroughfares that abut the Rezoning Area along the north and east, respectively. Flatlands Avenue runs east-west and

[3] Prior to publishing the DEIS, Block 4431, Lots 1 and 200 and a demapped portion of Alabama Avenue were all approved for a tax lot merger with Block 4430, Lot 1.

provides access to Flatbush Avenue, Utica Avenue, Ralph Avenue, Remsen Avenue, and Rockaway Parkway. Pennsylvania Avenue runs north-south and includes an access point to the Shore Parkway (also known as Belt Parkway), an arterial highway located to the south of the Rezoning Area.

The Rezoning Area is well-served by mass transit, including the following bus lines:

- BM2 Express and BM5 Express, which are express routes that commence at Starrett City and end in Manhattan. The BM2 provides access to Downtown Manhattan while the BM5 provides access to Midtown Manhattan.
- B6, which extends from East New York to Coney Island, and provides access to the Rockaway Parkway L subway station).
- B60, which extends from East New York (starting a block from the Rezoning Area) to Williamsburg and provides access to the Rockaway Parkway L subway station).
- B82 and B82 Select Bus Service (SBS) which extend from Starrett City to Coney Island and provide access door-to-door connection to the Rockaway Parkway L subway station (five stops away for B82, two stops for the B82 SBS). The B82 SBS only runs on weekdays.

- B83, which extends from Gateway Shopping Center to the Broadway Junction subway station (served by the A, C, J, L, and Z subway lines). The B83 bus line also provides access door-to-door connection to the Pennsylvania Avenue 3 subway station (an approximately 20-minute ride).
- B103 limited bus lines, which provides access to Downtown Brooklyn.

The East 105th Street and the Canarsie - Rockaway stations on the L Subway line are located an approximately 15- and 20-minute walk northwest from the Rezoning Area, respectively. The Canarsie - Rockaway station is directly accessible from the B82 and B82 SBS bus lines and also the B6 and B60 lines. The Pennsylvania Avenue station on the 3 Subway line is located to the north of the Rezoning Area.

The area located to the north of Flatlands Avenue is located within a Transit Zone, as set forth in Transit Zone Map 12 in Appendix I of the Zoning Resolution. Car ownership is approximately 0.3 cars per household, based on census tract data for the Rezoning Area (census tract 1058.04) and Starrett City (tract 1058.01). Across the Brooklyn transit zone, there is an average of 0.47 vehicles per household, and the overall average vehicle ownership rate for the entire borough of Brooklyn is 0.57 vehicles per household.

~~Project Area~~ Background and Surrounding Context

The ~~project site~~Rezoning Area is located at the northwestern end of the peninsula between Fresh Creek and Hendrix Creek, both inlets of Jamaica Bay. Much of the peninsula, including the areas south and east of the ~~project site~~Rezoning Area, is occupied by ~~Starrett City (now formally known as~~ Spring Creek Towers (formally known as Starrett City), a 140-acre affordable housing complex opened in 1974 that contains over 5,800 residential units in 46 buildings. The complex includes a community center and two schools. To the east of Spring Creek Towers/Starrett City along Hendrix Creek is the New York City Department of Environmental Protection's 26th Ward Wastewater Treatment Plant.

In addition to Spring Creek Towers/Starrett City, the area includes a number of other affordable housing properties. Immediately south of the ~~project site~~Development Site are ~~NYCHA's~~the New York City Housing Authority's (NYCHA) Vandalia Avenue complex and Council Towers, an assisted living facility for low-income seniors.[4] Northwest of the ~~site~~Rezoning Area is the 65-acre, 1,600-unit Breukelen Houses complex, which extends from East 103rd Street to Louisiana Avenue~~ and includes a row of ballfields~~, and the Breukelen Ballfields, which are located northwest of Flatlands Avenue between Williams and Louisiana Avenues. To the northeast is NYCHA's 21-building Linden House complex. These housing developments were generally built between the 1950s and 1970s.

Across Flatlands Avenue to the north of the ~~site~~Rezoning Area is a mapped M1-1 zoning district, an ~~industrial~~ area that includes low-rise buildings constructed in the 1950s and 1960s. Businesses in this area include used car sales, car repair, auto parts stores, transportation and busing businesses, and self-storage, along with mixed retail and commercial businesses. A 1980s low-rise commercial complex with restaurants, a bank, and a supermarket is located just west of the ~~Christian Cultural Center~~Rezoning Area across

[4] A narrow strip of this development with varying widths up to approximately 15 feet is located within the Rezoning Area.

Louisiana Avenue. The Fresh Creek Nature Preserve borders the creek's east and west sides; the area west of the creek consists mainly of single-family development that is part of the Canarsie neighborhood.

The Rezoning Area was zoned R3-2 dating back to 1961, during which time the Rezoning Area was configured as separate blocks bisected by Malta Street and Alabama, Georgia, and Sheffield Avenues. In 1966, the superblock to the east of the Rezoning Area was rezoned to C4-2 and R5 (CP-18730). In 1967, the C4-2 portion of the Rezoning Area was rezoned to R5 (CP-19815), and later that year the block to the south of Vandalia Avenue was likewise rezoned to R5 (CP-20066). The Spring Creek Towers/Starrett City complex was developed in the early 1970s in these locations.

Other rezonings surrounding the Rezoning Area included the mapping of commercial overlays, with two blocks to the northeast of the Rezoning Area along Pennsylvania Avenue being mapped with a C2-2 overlay in 1973 (CP-22531) and the block immediately west of the Rezoning Area along Louisiana Avenue being mapped with a C2-2 overlay in 1979 (M 770445A ZMK). In 1980, the southern portion of the project block, immediately south of the Rezoning Area, was rezoned to R5 to facilitate the development of the Vandalia Avenue housing complex (C 800248 ZMK).

The remainder of the project block, including the Rezoning Area, was rezoned to R5 in 1992 to facilitate a proposed large-scale residential development known as Fresh Creek Estates (C 900891 ZMK). Related actions included demapping of Alabama, Georgia, and Sheffield Avenues within the Rezoning Area (C 900890 MMK). The Fresh Creek Estates proposal included 477 affordable housing units to be developed within three-story townhouse apartment buildings, with on-site accessory parking and interior roadways. However, the project was never realized, and the Rezoning Area remained undeveloped until 1997 when the CCC was constructed. The Rezoning Area has remained in its current condition since that time.

Section 4: Required Approvals

The ~~proposed project~~Proposed Project will require the following actions, which will be refined prior to completion of the DEIS:

Zoning Map Amendment

- ~~A zoning map amendment to rezone the development site from R5 to R7-2 with a C2-4 overlay~~

The Applicant is seeking a zoning map amendment to change the existing R5 district within the Rezoning Area to an R7-2 district with a C2-4 commercial overlay. The existing R5 zoning does not allow for commercial uses, limiting possibilities for local retail and economic opportunity for small business owners. The C2-4 commercial overlay would address this need by allowing for a range of commercial uses at the Development Site, including a grocery store and local retail to serve residents of the Proposed Development and the surrounding neighborhoods. In addition, the R5 zoning does not allow for sufficient density to create the integrated residential, local retail, and community facility development at the proposed affordable income levels envisioned for the Development Site. The rezoning from an R5 district to an R7-2 district would allow for an increase in the development potential in

the Development Site from 1.25 FAR for residential to 4.6 FAR in an MIH district, and from 2.0 for community facility use to 6.5 FAR. The Proposed Development contemplates an FAR of 4.29 including the parking garage[5], and floor area allowed by the R7-2 zoning aligns with the Proposed Development in a manner appropriate to the area. The Rezoning Area is immediately adjacent to two wide streets, including one providing direct access to the Shore Parkway, and has good access to mass transit and is an appropriate area for the additional density being proposed, and without resulting in additional development potential that would occur with a higher density zone, such as an R8 district.

The proposed Zoning Map Amendment would also modify height and setback and yards controls in the Rezoning Area to establish a dynamic street wall presence within the Development Site in buildings with heights reflective of other residential buildings in the surrounding area. In particular, under Quality Housing and MIH controls and in absence of the additional land use actions being proposed, the proposed R7-2 zoning would require that (i) buildings be located at the street rather than separated from the streets by a front yard, (ii) buildings have a minimum base height of 40 feet and a maximum height of 75 feet before setback rather than a maximum street wall height of 30 feet; and (iii) a maximum building height of 135 feet and 13 stories where affordable is provided on site, instead of a maximum height of 40 feet. While the other land use actions seek some adjustment to these street wall controls to make the building configuration even more dynamic, the general bulk controls for R7-2 districts are appropriate for the area by bringing uses and building heights already in the area out to the street line, lending to their accessibility, providing more activity and eyes on the streets, and promoting a more pedestrian-friendly environment.

Zoning Text ~~Amendments~~Amendment

The Applicant is seeking two zoning text amendments:

- Amendment to Appendix F ~~to designate the Site as a~~of the Zoning Resolution (ZR) (Inclusionary Housing Designated Areas and Mandatory Inclusionary Housing ~~area~~ Areas) to establish the Rezoning Area as an MIH area, complying with Option 1 of MIH requirements.
- ~~Amendment~~An amendment to Appendix I ~~to change~~ of the ZR (Transit Zone) to expand the boundary of the ~~transit zone~~existing Transit Zone that is currently mapped north of Flatlands Avenue to include the ~~development site~~Development Site.

Special Permits

The Applicant is seeking two special permits:

- A Special Permit pursuant to ZR 74-743(a)(2) to locate buildings within a large-scale general development without regard for yard, ~~court,~~ distance between buildings, and height and setback regulations ~~in general large-scale~~ to allow for the centralized community-centered core and street-oriented residential buildings envisioned by the Proposed Project.
  - Yards:

[5] FAR exclusive of the parking garage would be 3.86.

- The Development Site is comprised of a series of corner lot, through lot, and interior lot areas and would require a series of yards adjacent to the common lot line with the neighboring property, even though a significant setback exists between the common lot line and the adjoining buildings. In particular, waivers are being requested for ZR 35-54 and ZR 23-51, which require a side yard along the common side lot line to the south with a minimum depth of 8 feet; of ZR 33-303 which requires a rear yard of 20 feet for commercial uses; and ZR 23-471 and 23-543, which require a rear yard of 30 feet for residential uses. Waiving side and rear yard requirements along the common property line allows for the location of the PAC in the center of the Proposed Project and the introduction of the central quadrangle as a significant community open space. The yard waivers would also allow for the location of the public parking garage in proximity to the PAC and the CCC. Accordingly, the Applicant requests a modification of the rear yard requirements of Zoning Resolution Section 23-47 (Minimum Required Rear Yards) and the special side yard requirements of Section 23-51 (Special Provisions for Yards Adjacent to R1 Through R5 Districts) to eliminate yard requirements along portions of the southern boundary of the Development Site.

- Distance between buildings:
  - In order to introduce a residential presence along Louisiana Avenue and at the same time maintain the CCC in its existing location, limited modifications to the requirements of Zoning Resolution Section 23-711 (Standard minimum distance between buildings) are requested between Building 7 and 8 and the CCC building. At the closest point, there would be a separation of 30 feet 6 inches between the two buildings; the amount of separation quickly expands in the areas where the modification is requested. A modification is also requested between Building 5, Building 6, Building 9 and 10, and the CCC. These modifications would allow the large-scale general development (LSGD) to improve the streetscape by introducing a residential and retail presence along Louisiana Avenue and Flatlands Avenue and at the same time maintain the CCC in its existing location. Because the CCC building is only 36.6 feet tall, this condition is limited to the lowest floors of the residential buildings. A modification is also requested between Building 4 and the PAC to allow the PAC to be situated at the core of the LSGD and adjacent to the central quadrangle and public parking garage, resulting in a better site plan.

- Height and Setback:
  - While the proposed R7-2 district provides an appropriate density for the Development Site and the Proposed Project, R7-2 MIH developments are subject to height and setback controls that do not allow for the strong street wall presence and variation in heights envisioned for the Proposed Project. In particular, MIH developments are limited to a height of 75 feet within 10 feet of a wide street and 15 feet of a narrow street and an overall building height of the lesser of 135 feet or 13 stories, and a minimum base height of 40 feet is

required. Additionally, within 25 feet of an adjoining R5 district, buildings are limited to a maximum height of 55 feet within 100 feet of a wide street and 45 feet beyond 100 feet of a wide street. While much of the Proposed Project would comply with the minimum and maximum height limitations, the height of portions of the Proposed Project's street wall would exceed the 75-foot height. In addition, portions of the Proposed Project would exceed the 135-foot and 13-story height limitation by one story for Buildings 3, 5, and 6 (to a height of up to approximately 154.84 feet plus bulkhead) and by two stories for Building 1 (to a height of approximately 160.87 feet plus bulkhead). Building 2 would not exceed the maximum number of stories permitted but would exceed the maximum permitted height and rise to a height of approximately 139.77 feet plus bulkhead. Within 25 feet of the southern boundary of the Development Site, portions of Buildings 2, 4, 9 and 10, the PAC, and the garage would exceed the maximum permitted height within 25 feet of an R5 district. Portions of the street wall of Buildings 1, 3, 5, 6, and 7 and 8 would be set back at a height lower than the minimum base height but no higher than above the second story. The modification of height and setback controls allows for buildings with a dynamic and varied profile with building elements ranging from six to fifteen stories creating visual interest throughout the project. The higher elements also allow for the introduction of the central quadrangle to the middle of the Development Site surrounded by the lower scale core anchored by the CCC and the PAC, which is anticipated to have a maximum height of approximately 50 feet. Accordingly, a modification to Zoning Resolution Sections 23-693 (Special provisions applying adjacent to R1 through R6B Districts), 23-951 (Height and Setback for compensated developments in Inclusionary Housing designated areas), 23-952 (Height and setback in Mandatory Inclusionary Housing areas), and 23-66 (Height and Setback Requirements for Quality Housing Buildings), 35-65 (Height and Setback Requirements for Quality Housing Buildings), and 23-693 (Special provisions applying adjacent to R1 through R6B Districts) is requested to permit modifications of minimum and maximum base height before setback and maximum building height controls.

- A Special Permit pursuant to ZR 74-512 to permit a public parking garage with more than 150 spaces
  - ~~Special Permit pursuant to ZR 74-532 to reduce or waive~~ some of which would be located on the ~~number of required accessory residential off-street~~roof of the public parking ~~spaces in~~garage during periods of peak parking demand for the church (Sundays and Tuesday evenings). This special permit would allow for a ~~general large-scale development within the transit zone~~public parking garage that would be a sufficient size to serve the congregants of the CCC, visitors to the PAC and other community facility and commercial uses that are part of the Proposed Project and would consolidate the existing surface parking into an enclosed facility allowing for the productive use of the Development Site for the Proposed Project.

The Applicant also intends to seek public funds and/or financing from various City and New York State agencies and/or programs related to affordable housing development. The discretionary CPC actions, along with the discretionary public funds that may be sought by the Applicant, are collectively referred to as the "Proposed Actions."

Section 5: Proposed ~~Development~~Project

The ~~applicant~~Applicant is proposing to ~~build~~ replace the underutilized portions of the Development Site with a mix of community facility, commercial, and residential uses~~, and open space with construction to be phased over a ten-year period. The proposed development anticipates a total of 13 buildings ranging from approximately 40 to 183 feet tall (without bulkhead), including 9 residential buildings~~ targeted at creating a sustainable, affordable neighborhood anchored by the presence of the CCC and targeted at addressing a number of economic, social, educational and cultural needs of the neighborhood. Overall, the Proposed Project would incorporate 10 new buildings on the Development Site, including eight predominantly residential buildings[6] ranging in height from two to 15 stories, with a total of approximately 2,~~118~~050 units~~. These units would include approximately 1,825 affordable housing units, up to 267 units of senior or supportive housing, and 26 maisonettes under~~ affordable ~~ownership that would be attached to four of the residential buildings. The development would also include a school, a performing arts/cultural center, a trade school, 528 parking spots for residents, and a 593-space parking garage for the non-residential uses. A grocery store and local retail shops would be located on the ground floor of the residential buildings~~to households with ~~frontage along the perimeter avenues. The existing~~ a range of incomes between 30 percent and 100 percent of the area median income (AMI). The CCC building would ~~be incorporated~~remain as the dominant feature of the Development Site. Serving its parishioners and the surrounding community, the CCC would be part of a multi-faceted community facility core that includes the PAC, a trade school, a day care facility, a senior center, and a central green space.

Ground floor retail and a grocery store providing opportunities for local businesses would be introduced along the public and private street frontages, creating economic opportunity and responding to the dearth of walkable local retail in the neighborhood. A privately-owned, publicly accessible street system would be introduced into the ~~proposed development.~~ Development Site aligned with the adjoining street grid to invite people into the Proposed Project and create a more walkable environment. Finally, a seven-story public parking garage, accommodating up to approximately 500 parking spaces for these uses, would be located near Louisiana Avenue and would serve as a replacement to the surface parking that exists today. Overall, the Proposed Project would include approximately 84,950 sf of publicly accessible open space, consisting of a public plaza on the corner of Flatlands Avenue and Louisiana Avenue, a public arcade and entry plaza and a central quadrangle. The Proposed Project would also include an 11,000-sf playground adjacent to the child care center which would also serve residents, a 18,400 sf private recreational space to be located on the roof of the parking garage which would be flexible to accommodate parking for vehicles during peak church hours (Sunday and Tuesday evenings only), and approximately 36,000 sf of

[6] As shown in **Figure 3** below, the ten buildings include eight residential buildings, the above grade parking garage, and the PAC. Residential buildings 7 and 8 are connected as one building and Buildings 9 and 10 are connected as one building, though they would have separate residential lobbies.

private passive open space including residential building courtyards and rooftop areas. The Proposed Project would include pedestrian paths and a private street network that would run through the Development Site. Construction of the Proposed Project would be phased over a ten-year period, with completion anticipated in 2031.

It is the Applicant's intention that the ~~proposed development~~Proposed Project would comply with and exceed the requirements of Option 1 of the City's ~~Mandatory Inclusionary Housing ("~~MIH~~")~~ program. Option 1 has the following requirements:

- 25 percent of new housing units must be set aside for families making an average of 60 percent or less of ~~Area Median Income, or~~ AMI.
- Of this set-aside, at least 10 percent must be for families making an average of 40 percent or less of AMI.

~~For the proposed development, each building in the master plan would include 10 percent of units at 40 percent of AMI; 10 percent of units at 50 percent of AMI; and 10 percent of units at 60 percent of AMI. Inclusive of the MIH units, the development is expected to have the following overall affordability levels:~~

- ~~50 percent extremely low-income/very low-income/low-income (30 percent to 60 percent AMI)~~
- ~~25 percent low-income/moderate-income (70 percent AMI to 100 percent AMI)~~
- ~~25 percent moderate-income (100 percent AMI to 120 percent AMI)~~

~~The non-MIH units would be income-based affordable housing through various city and state programs for low, moderate, and middle income. The income bands for the affordable housing units in excess of the MIH requirement, as well as the applicable programs for the senior/supportive housing units, will remain subject to the availability of capital subsidy and other public capital sources at the time of construction.~~

~~The proposed project would result in approximately 2,417,190 gsf of development, of which approximately:~~

- ~~1,975,280 gsf would be residential (including 187,450 gsf of residential parking)~~
- ~~82,005 gsf would be retail, assumed to consist of a 16,720 gsf grocery store and 65,285 gsf of local retail space~~
- ~~10,230 gsf would be for day-care use~~
- ~~55,000 gsf would be for an educational facility~~
- ~~16,500 gsf would be for a performing arts/cultural center (i.e., community theater)~~
- ~~170,390 gsf would be structured parking for the existing CCC facility and other community facilities~~
- ~~15,000 gsf would be for a trade school within the same building as the structured parking for the CCC facility~~

Further, the Proposed Development is focused on meeting the needs of a significant portion of the population in East New York and in Brooklyn at large by providing workforce housing at the very low-, low-, and moderate-income housing brackets. According to the U.S. Census Bureau's 2019 American Community Survey (ACS) data, a three-person household in Brooklyn Community District 5 (East New York and Starrett City) has a median income of

$51,648,[7] approximate to the 50 percent AMI band set by the NYC Department of Housing Preservation and Development (HPD). Utilizing this datapoint as a reference, the Proposed Development would fill the need for affordable housing in the area by providing housing within the 30 percent to 100 percent AMI band, with 50 percent at 60 percent of AMI or less. 25 percent of units would be provided at 80 percent of AMI or less and 25 percent of units would be provided at 100 percent of AMI or less.

In addition, up to 100 homeownership units would be provided through the HPD Open Door program at the moderate-income band. In total the Proposed Development would include approximately 2,050 units of 100 percent rent-stabilized, intergenerational, income-based housing. The units provided would be a diverse mix of unit types, including 2-bedroom and 3-bedroom residences and would be coupled with requisite resources to allow members of the community to thrive.

The Proposed Development would be consistent with Housing New York 2.0's goal of creating more homes for seniors by providing up to 200 units for seniors. In addition, the Proposed Development would further the plan's goal of building protections against displacement in fast-changing neighborhoods by providing mixed-income dwelling units at a range of income bands, allowing residents to remain in the community, even if their economic health changes. Finally, the Proposed Development would be constructed on the currently vacant and underutilized lots on the eastern portion of the Development Site, furthering the plan's goal of unlocking the potential of vacant lots.

The Proposed Development would support several of the initiatives outlined in OneNYC 2050 as well, including the initiative to ensure all New Yorkers have access to safe, secure, and affordable housing.

In total, the Proposed Project would result in approximately 2,200,538 gsf of development. This would include approximately 100,904 gsf of community facility space, including general community facility space to include a day care (approximately 12,320 gsf), other community facility uses such as a senior center or medical clinic (approximately 9,900 gsf), and the existing CCC facility (78,684 gsf); approximately 110,570 gsf of commercial space that includes a grocery store (approximately 14,300 gsf) and local retail space (approximately 65,670 gsf), a trade school (approximately 14,100 gsf) to be located in one wing of the existing CCC building;[8] a new PAC (approximately 16,500 gsf); and approximately 343,244 gsf of parking including a total of approximately 886 parking spaces within subgrade parking (approximately 386 parking spaces) and an approximately 7-story, 500-space public parking garage for the retail and community facility uses. During peak parking periods for the church (Sundays and Tuesday evenings), approximately 21,889 sf of parking (of the approximately 182,277 gsf public parking garage) would be provided on the roof of the proposed public parking garage.

The new buildings would be arranged around the existing CCC building to create a community facility core anchored by the CCC, with residential uses surrounding and adjacent

[7] From Table B19019 of the 2019 ACS 5-Year Estimates Detailed Tables from the U.S. Census, showing Median Household Income in the past 12 months (in 2019 inflation-adjusted dollars) by household size. Available: Table B19019

[8] The proposed trade school is geared towards providing vocational training and career trajectory counseling for adults and would not be adding public school seats towards primary and secondary school education. Thus, the approximately 16,500 gsf would not be included in the public schools analysis as detailed in the Draft EIS.

to this core. Similar to its current configuration, the CCC would be accessed by pedestrians through a courtyard plaza leading from Louisiana and Flatlands Avenues to the building's front door, with a second entrance leading from Flatlands Avenue. Adjacent to the CCC, in the interior of the Development Site, would be an open quadrangle and the PAC, creating a central gathering space for community facility visitors, churchgoers, occupants of the residential buildings, and the general public. The central quadrangle and the PAC would be visible from Flatlands Avenue, with views highlighted by an approximately 20-foot-tall arcade within Building 5 connecting Flatlands Avenue to the central quadrangle. The proposed public parking garage would be located adjacent to the PAC and CCC along Louisiana Avenue, limiting the visibility of this use and placing it in close proximity to the intended users of the facility. It is anticipated that private basketball courts or other recreation space would be located on the roof of the proposed public parking garage as an additional amenity for residents.

Vehicular access to the Development Site would include proposed entrances from Pennsylvania Avenue and Louisiana Avenue and a right-turn-in/right-turn-out access on Flatlands Avenue at Sheffield Avenue. Interior vehicular circulation would be facilitated via extensions of Sheffield Avenue and Georgia Avenue through the northern portion of Development Site, connecting with a proposed east-west interior roadway providing access to the proposed public parking garage, drop-off areas for the CCC, and the mixed-use buildings located on the western portion of the site. Site egress would be provided from Georgia Avenue and Sheffield Avenue. A signal warrant analysis will be conducted to determine if a new traffic signal can be installed at this location.

In order to create strong street presence and allow for local retail in the base of the buildings, the proposed residential buildings would front on the perimeter avenues and the private streets. The residential buildings would range in height from approximately 129 to 161 feet—with street wall heights within 100 feet of Flatlands Avenue ranging between approximately 20 and 161 feet, and street wall heights beyond 100 feet of Flatlands Avenue of approximately 21 and 120 feet along Pennsylvania Avenue and ranging between approximately 25 feet and 134 feet along Louisiana Avenue.

The residential buildings would contain ground floor commercial and community facility uses facing outward, including a grocery store and local retail shops fronting on the perimeter avenues. Approximately 30 residential maisonette units with individual entrances and front stoops would be located on the newly created private inner streets. The proposed residential buildings would contain between 179 and 315 dwelling units. Parking would be located below-grade in the cellars of various buildings, with a total approximate 386 parking spaces proposed.

Existing curb cuts on Louisiana and Pennsylvania Avenues would be relocated to facilitate a new internal private~~, but publicly accessible,~~ street network. On Flatlands Avenue, one existing curb cut that aligns with Georgia Avenue would be maintained and a second would be relocated~~. The development~~ from its current alignment with Alabama Avenue to align with Sheffield Avenue.

In addition, the Proposed Project would ~~include 81,240 sf~~facilitate better access to public transit options through the operation of ~~publicly accessible open space. As part of the proposed project,~~ a private shuttle service ~~would be operated~~available to residents and the CCC (on Sundays) to and from the nearest subway stops (East 105th Street on the L line and

Pennsylvania Avenue on the 3 line) during peak commuting hours. The shuttle is anticipated to commence operation upon full completion of the overall development.

It is anticipated that the Proposed Development would be constructed in several phases, during which time the CCC would remain operational. Phase 1A would consist of Buildings 1 and 2, located in the easternmost portion of the Development Site adjacent to Pennsylvania Avenue. Buildings 3 and 4, located just west of Phase 1A, and the Garage would be constructed in Phase 1B, which is currently contemplated to occur following Phase 1A. During this time, sufficient parking for CCC would be provided on the paved parking lot. Upon completion of the Garage, congregants and visitors to the CCC would be able to utilize the Garage for parking, with access provided via the existing paved parking lot, allowing for construction of the later phases while maintaining necessary parking for CCC services.

Phase 2A and Phase 2B, which may be constructed in any order or simultaneously, would include Building 5 and Building 6 located to the north of the CCC along Flatlands Avenue, and the PAC and quadrangle, respectively. Phase 2B would also include the final leg of the construction of the private streets providing permanent access between the parking garage and Louisiana and Flatlands Avenues. Building 7 and 8 (which is a single building with two portions) located to the west of the CCC along Louisiana Avenue would be constructed in Phase 3A and Building 9 and 10 (which is also a single building with two portions) at the southwestern corner of the Development Site adjacent to the parking garage would be constructed in Phase 3B.

Table 1 summarizes the total development projected on the Development Site. **Figure 2** and **Figure 3** show the proposed site plan and the Proposed Project axonometric diagram.

In order to create strong street presence and allow for local retail in the base of the buildings, the proposed residential buildings would front on the perimeter avenues and the private streets. The residential buildings would range in height from approximately 129 to 161 feet—with street wall heights within 100 feet of Flatlands Avenue ranging between approximately 20 and 161 feet, and street wall heights beyond 100 feet of Flatlands Avenue of approximately 21 and 120 feet along Pennsylvania Avenue and ranging between approximately 25 feet and 134 feet along Louisiana Avenue.

The residential buildings would contain ground floor commercial and community facility uses facing outward, including a grocery store and local retail shops fronting on the perimeter avenues. Approximately 30 residential maisonette units with individual entrances and front stoops would be located on the newly created private inner streets. The proposed residential buildings would contain between 179 and 315 dwelling units. Parking would be located below-grade in the cellars of various buildings, with a total approximate 386 parking spaces proposed.

Existing curb cuts on Louisiana and Pennsylvania Avenues would be relocated to facilitate the new internal private street network. On Flatlands Avenue, one existing curb cut that aligns with Georgia Avenue would be maintained, and a second would be relocated from its current alignment with Alabama Avenue to align with Sheffield Avenue.

Table 1 Overview of Proposed Project ~~Projected Development~~

Use	Total GSF
Residential[1]	1,645,820
Retail	65,670
Day Care	12,320
~~Educational Facility~~	~~55,000~~
Performing Arts Center	16,500
Structured Parking	197,560
Residential Parking	145,684
Trade School	14,100
Existing CCC Facility	92,784
Total	2,200,538

Figure 2 Innovative Urban Village Site Plan



Figure 3 Innovative Urban Village Axonometric



Section 6: Project Purpose and Need

The ~~proposed actions~~Proposed Actions are being requested in order to allow the bulk, uses, and density required to meet the Applicant's goals for the ~~proposed project.~~Proposed Project. As described in **Section 3, Rezoning Area and Context,** the ~~development site~~Development Site is located within an area densely developed with affordable housing. To the east and south, the Spring Creek Towers/Starrett City and Vandalia Avenue housing ~~complex~~complexes are made up of 10- to 20-story towers, while the Breukelen Houses to the northwest are three to seven stories in height. Across Flatlands Avenue and Louisiana Avenue are low-rise industrial and commercial businesses. The ~~Christian Cultural Center~~CCC is located in the northwest corner of the Development Site, however the site~~, which~~ overall is underutilized and is otherwise occupied by paved and unpaved parking.

The site's existing R5 zoning, with an FAR of 1.25 and a height limit of 40 feet, typically produces three- and four-story attached houses and small apartment houses. However, demand for affordable housing in East New York continues to grow, and Brooklyn Community District 5 has identified needs for additional affordable housing and other amenities that cannot be met under the site's existing zoning. ~~The proposed actions~~In addition, New York City's affordable housing plan, "Housing New York 2.0," aims to create and preserve 300,000 high-quality, affordable homes by 2026 to address the needs for affordable housing throughout the City. The Proposed Actions would address these needs as follows:

- The Zoning Map Amendment ~~to rezone the development site R7-2 with a C2-4 overlay: The map amendment~~ is needed to facilitate the additional ~~residential~~ density required to provide a substantial amount of affordable housing and other desired uses in Community District 5. The ~~proposed redevelopment~~existing R5 zoning does not allow for commercial uses, limiting opportunities for local retail and economic opportunity for small business owners. The C2-4 commercial overlay would address this need by allowing for a range of commercial uses on the Development Site, including a grocery store and local retail to serve residents of the Proposed Project and the surrounding neighborhoods. In addition, the R5 zoning does not allow for sufficient density to create the integrated residential, local retail, and community facility program envisioned for the Development Site. The additional density would allow for a new public parking garage to replace the open parking which presently occupies the majority of the Development Site, in turn allowing for new development across the entirety of the Development Site. The rezoning from an R5 district to an R7-2 district would allow for an increase in the development potential on the Development Site from 1.25 FAR for residential to 4.6 FAR in an MIH district, and from 2.0 for community facility use to 6.5 FAR. The Proposed Project would be 4.29 FAR and would be consistent in scale and form with the existing affordable housing development in the area, such as the Starrett City and Vandalia Avenue complexes.
- The Zoning Text Amendment to designate the site as ~~a Mandatory Inclusionary Housing (MIH)~~an MIH area~~: Designation of the site as MIH~~ would support community and citywide public policy goals by providing permanently affordable housing across a range of income levels~~ from 30 to 120 percent of Area Median Income (AMI), with over 50 percent of units reserved for extremely low-income to low-income residents (30 percent AMI to 60 percent~~

~~AMI).~~, which otherwise would not be required if the Development Site were developed as-of-right.

- The Zoning Text Amendment to include the ~~development site~~Development Site within the Transit Zone~~: This text amendment~~ is needed to ~~reduce the amount~~avoid unnecessary costs of ~~required~~building parking~~, which would otherwise make it difficult to provide~~ on the Development Site in excess of anticipated demand by residents. The Development Site is directly across Flatlands Avenue from the ~~proposed amount of affordable housing~~Transit Zone boundary to the north and ~~associated community facilities.~~ has a range of transit options serving the Development Site, including the Subway (the East 105th Street stop on the L is located a six and a half block walk from the Development Site) and the BM2 Express, BM5 Express, B6, B6 limited, B60, B82, B82 Select Bus Service (SBS), B83, and B103 limited bus lines, providing local and express service throughout Brooklyn, Manhattan, and Queens. For this reason, it is anticipated that most new residents would use public transit as the primary transportation method. Currently, approximately 62 percent of the residents, based on census data, commute to work via mass transit. The change in boundaries would reflect this fact and would promote more sustainable forms of transportation.
- The Special Permit for a large-scale general development~~: This permit~~ is needed to accommodate the desired housing density and facilitate a superior site plan, including driveways for circulation, a pedestrian-friendly ~~campus, and active ground-floor uses that will activate the street frontage~~site, a centralized community-centered core, and to create visual interest with varied building heights and profiles throughout the Proposed Project.
- The Special Permit for a public parking garage with more than 150 spaces~~: This permit is needed~~, some of which are to ~~provide~~be located on the roof of the garage, would allow for a garage of sufficient ~~parking for the existing church~~size to serve the congregants of the CCC, who travel from across the City, as well as the visitors to the retail and ~~for proposed~~ community facility uses, ~~which would include a performing arts center and trade school that would benefit the surrounding community.~~
- ~~Special Permit~~and would consolidate the existing surface parking into an enclosed facility allowing for the productive use of the Development Site for ~~a reduction in required accessory off-street parking spaces within the Transit Zone: In conjunction with the text amendment to include the site in the Transit Zone, this permit would reduce the parking requirement in order to accommodate the proposed amount of affordable housing~~the Proposed Project.

Section 7: Analysis Framework

Analysis (Build) Year

The environmental analyses set forth in this ~~Draft Scope of Work~~FSOW consider the environmental effects of the ~~proposed actions~~Proposed Actions based on a comparison of expected conditions without approval of the ~~proposed actions~~Proposed Actions, the "No-Action condition," to expected conditions with approval of the ~~proposed actions~~Proposed Actions, the "With-Action condition," in the analysis year. Assuming approval of the ULURP

application in ~~2021~~2022 and a conservative build-out of approximately 10 years, the ~~proposed project~~Proposed Project is expected to be complete and operational by 2031 (the "build year"). The difference between the No-Action and With-Action conditions represents the increment to be analyzed as part of the environmental review.

Future No-Action Condition

Under the baseline, or No-Action, condition, it is assumed that the ~~site~~Development Site would remain in its existing condition. As relevant for each area of analysis, future growth in population and employment will be considered in the development of the No-Action condition of that study area. This will include both background growth and growth generated by known projects (developments that are under construction, planned, or proposed). Inclusion of known development will be based on but not limited to consideration of whether the project requires discretionary approvals, the status of that approval process, and the project size.

Future With-Action Condition/Increment for Analysis

The With-Action condition on the ~~project site~~ Development Site reflects the ~~proposed project~~Proposed Project (see **Section 5**). The ~~project~~Proposed Project would result in approximately 2.~~4~~2 million gsf of new development (4.~~65~~29 FAR); **Table 2** provides the increment for analysis. The development would include approximately ~~81,000~~84,950 sf of publicly accessible open space~~, consisting~~ and approximately 65,400 sf of ~~green~~private open space~~, a campus quadrangle, a school playground, and landscaped walkways.~~.[9] The With-Action development would include pedestrian paths and a private, but publicly accessible, driveway that would run through the site.

[9] The proposed private active open space would also be accessible to the public. The rooftop recreation space, considered private active open space, would be accessible to the public at all times with the exception of peak church parking demand periods on Tuesday evenings and Sundays and within the hours posted per the public access agreement (PAA). However, as this space is considered private, it is not included in the quantitative analysis in the Open Space chapter.

Table 2 Increment for Analysis

Use Group		Existing Condition	No-Action Condition	With-Action Condition	Increment
Residential	Dwelling Units	-	-	2,050	2,050
	Affordable Units			1,538	1,538
	Total Residential GSF	-	-	1,645,820	1,645,820
Commercial	Local Retail	-	-	65,670	65,670
	Performing Arts Center	-	-	16,500	16,500
	Trade School	-	-	~~15,000~~14,100	~~15,000~~14,100
	Grocery Store	-	-	14,300	14,300
	Total Commercial GSF	-	-	**110,570**	**110,570**
Community Facility	Day Care	-	-	12,320	12,320
	Senior Center/Medical Office	-	-	9,900	9,900
	Existing CCC Facility	~~-~~92,784	~~-~~92,784	78,684	-14,100
	Total Community Facility GSF	**92,784**	**92,784**	**100,904**	**8,120**
Open Space	Public Open Space	-	-	84,950	84,950
	Private Open Space	-	-	65,400	65,400
Parking[1]	Public Garage Spaces	-	-	500	500
	Public Parking Garage GSF	-	-	197,560	197,560
	Accessory Residential Parking Spaces	-	-	386	386
	Accessory Residential Parking ~~gsf~~ GSF	-	-	145,684	145,684
	Lot Spaces[2]	385	385	-	-385
	Total Parking GSF	-	-	343,244	-
Residents[2]		-	-	4,797	4,797
Employees[3]		130	130	610	480

[1] Of the total 197,560 gsf of public parking provided, 25,410 sf would include flex space provided on the roof of the proposed public parking garage to allow for increased parking capacity during the church's peak parking periods (Sundays and Tuesday evenings).

[2].The number of residents is based on an average household size of 2.34 persons per dwelling unit for the half-mile study area, including Census Tracts 982, 984, 986, 1016, 1058.01, 1058.04, 1104 and 1106 (2014-2018 ACS).

[3]. Employee estimates were derived using ratios provided by the NYC Department of City Planning. The number of employees working in residential buildings was calculated by dividing the total residential units by 25 dwelling units (82 building employees).The number of retail and grocery workers was calculated by dividing the total commercial gsf by 333.3 sf (240 retail employees). The number of employees generated by the PAC, Trade School, and general community facility space including a day care and senior center was calculated by dividing the total gsf by 333.3 sf (158 employees). The number of employees of the existing CCC Building was provided by the CCC (130 employees)

Of the range of scenarios that are considered reasonable and likely to occur, the scenario with the worst environmental consequences is the RWCDS. The ~~proposed project~~Proposed Project was determined to be the RWCDS because development pursuant to the ~~proposed actions~~Proposed Actions would be restricted to the bulk and density shown on the special permit drawings. While development in the absence of the special permit could have different environmental effects than the ~~proposed project~~Proposed Project, this scenario is not considered reasonable and likely to occur, and therefore analysis is not warranted for the following reasons: (1) the special permit for a large-scale general development will provide greater flexibility than as-of-right zoning in siting and massing the desired housing and allow for needed circulation not permitted with as-of-right zoning; (2) a special permit for a

public parking garage with more than 150 spaces is needed to provide sufficient parking for the existing church and for proposed community facility uses, which would include ~~a performing arts center~~the PAC and trade school that would benefit the surrounding community; and (3) without the special permit for a reduction in required accessory off-street parking spaces, the parking requirements would make additional development infeasible.

Section 8: Proposed Scope of Work for the DEIS

The New York City Department of City Planning, as lead agency for the environmental review, determined that the Proposed Project has the potential to result in significant environmental impacts and, therefore, pursuant to CEQR procedures, issued a Positive Declaration requiring that a Draft EIS be prepared for the Proposed Project that analyzes all technical areas of concern. The Draft EIS will be prepared in conformance with all applicable laws and regulations, including the State Environmental Quality Review Act (SEQRA) (Article 8 of the New York State Environmental Conservation Law) and its implementing regulations found at 6 NYCRR Part 617, New York City Executive Order No. 91 of 1977, as amended, and the Rules and Procedure for CEQR, found at Title 62, Chapter 5 of the Rules of the City of New York.

As described previously, the environmental review provides a means for decision-makers to systematically consider environmental effects along with other aspects of project planning and design, to evaluate reasonable alternatives, and to identify, and mitigate where practicable, any significant adverse environmental impacts.

The EIS, following the guidance of the *2014~~1~~21 CEQR Technical Manual*, will contain:

- A description of the ~~proposed actions~~Proposed Actions, the ~~proposed project~~Proposed Project, and its environmental setting;
- An analysis of the potential of the ~~proposed project~~Proposed Project to cause significant adverse impacts in a range of environmental categories, comparing conditions with the project in the project's build year against conditions that would exist in the absence of the project;
- A statement of the potential significant adverse environmental impacts of the ~~proposed project;~~Proposed Project;
- A description of feasible mitigation measures that would eliminate or minimize adverse environmental impacts;
- An identification of any adverse environmental effects that cannot be avoided if the ~~proposed project~~Proposed Project is implemented because mitigation is not practicable;
- A discussion of alternatives to the ~~proposed project~~Proposed Project; and
- A discussion of any irreversible and irretrievable commitments of resources to develop the project.

As noted above, the EIS will analyze the ~~proposed project~~Proposed Project for all technical areas of concern. The specific technical areas to be included in the EIS were identified in the EAS dated January 16, 2020. The EAS identified the following technical areas as having the potential to result in significant adverse impacts, and therefore warranting additional analysis in the EIS: land use, zoning, and public policy; socioeconomic conditions; community facilities and services; open space resources; shadows; historic and cultural resources; urban

design and visual resources; natural resources; hazardous materials; water and sewer infrastructure; solid waste and sanitation services; transportation; air quality; greenhouse gas emissions and climate change; noise; public health; neighborhood character; and construction. The ~~proposed actions~~Proposed Actions would not have the potential to result in significant adverse impacts in the following technical area, which therefore will not be analyzed in the EIS:

- Energy: The ~~proposed project~~Proposed Project would not affect the transmission or generation of energy, and the incremental energy demand resulting from the project would not create a significant impact on energy supply. Therefore, additional analysis of this technical area is not warranted. Although significant adverse energy impacts are not anticipated for the Proposed Project, the EIS will disclose the projected amount of energy consumption during long-term operation resulting from the Proposed Project, as this information is required by the New York State Department of Environmental Conservation, prescribed by State Environmental Quality Review Act (SEQR). This information is also required for the assessment of Greenhouse Gas Emissions.

The first step in preparing the EIS is the preparation of a ~~Draft Scope of Work~~DSOW and public scoping process. Scoping is the process of focusing the environmental impact analysis on the key issues that are to be studied in the EIS. The proposed scope of work for each technical area to be analyzed in the EIS follows. The scope of work and the proposed impact assessment criteria below are based on the methodologies and guidance set forth in the *2021 CEQR Technical Manual*.

Task 1: Project Description

As the first chapter of the EIS, the Project Description introduces the reader to the ~~proposed project~~Proposed Project and sets the context in which to assess impacts. This chapter will contain a description of the ~~proposed project~~Proposed Project: its location; the background and/or history of the project; a statement of the purpose and need; key planning considerations that have shaped the current proposal; a description of the ~~proposed actions~~Proposed Actions; and a discussion of the approvals required, procedures to be followed, and the role of the EIS in the process. This chapter gives the public and decision makers a base from which to evaluate the ~~proposed project.~~Proposed Project. In addition, the ~~project description~~Project Description chapter will present the framework for the analysis of the environmental impacts of the ~~proposed actions~~Proposed Actions and identify the analysis year(s) and project phasing.

Task 2: Land Use, Zoning, and Public Policy

This chapter will analyze the potential impacts of the ~~proposed project~~Proposed Project on land use, zoning, and public policy, pursuant to the methodologies presented in the *CEQR Technical Manual*. A land use analysis characterizes the uses and development trends in the area that may be affected by the ~~proposed project~~Proposed Project, describes the zoning controls and public policies that guide development, and determines whether a proposed project is compatible with an area's land use patterns and trends or may alter them. Similarly, the analysis considers the ~~action's~~actions' compliance with, and effect on, the area's zoning and other applicable public policies, including the City's Waterfront Revitalization Plan (WRP).

The land use, zoning, and public policy chapter will provide information necessary for the analysis of the environmental impacts of the ~~proposed actions~~Proposed Actions in other technical areas.

The land use study area will consist of the area within ~~¼~~a quarter mile of the perimeter of the ~~development site~~Rezoning Area (see **Figure 4** through **Figure 6**). This study area may be refined based on further analysis of land use patterns and trends. The analysis will include the following subtasks:

- Provide a description of land use, zoning, and public policy in the study area under current conditions. Recent trends in the study area will be noted. Other public policies that apply to the study area will also be described.
- Based on field surveys and prior studies, identify, describe, and graphically portray current land use patterns in the study area. Describe the study area's development history and recent land use trends and identify major factors influencing the area's land use trends.
- Describe and map existing zoning and any recent zoning actions in the study area. Prepare a list of future development projects in the study area that are expected to be constructed by the build year. Also, identify pending or known proposed zoning actions or other public policies that could affect land use in the study area. Based on these planned projects and initiatives, assess future land use and zoning conditions in the future without the proposed actions (No-Action condition).
- Describe proposed zoning and land use changes that would occur with the ~~proposed project~~Proposed Project based on the With-Action condition.
- Discuss the potential effects of the ~~proposed project~~Proposed Project related to issues of compatibility with surrounding land use, zoning, and other public policies, and the effect of the ~~proposed project~~Proposed Project on ongoing development trends in the study area.
- Assess the ~~proposed project's~~Proposed Project's conformity to city goals, including consistency with the City's sustainability goals (PlaNYC/OneNYC), the mayor's affordable housing plan (Housing New York 2.0), landmark preservation policies, goals related to the East New York Neighborhood Plan, and any other relevant public policies.
- Evaluate the project's compliance with the WRP, including Policy 6.2, which requires consideration of the latest sea level rise (SLR) projections into the planning and design of projects in the coastal zone. Published SLR projections will be evaluated for various project life spans using the New York City Panel on Climate Change projections of climate change and sea level rise, published in January 2015, and mapping will be provided showing the estimated extents of future inundation during storm event scenarios. The WRP section will assess how the features of the ~~proposed development~~Proposed Project would be consistent with the WRP policies.
- If significant adverse impacts are identified, identify feasible mitigation measures, if any, to avoid or reduce potential significant adverse land use, zoning, and/or public policy impacts.

Figure 4 Existing Zoning Map

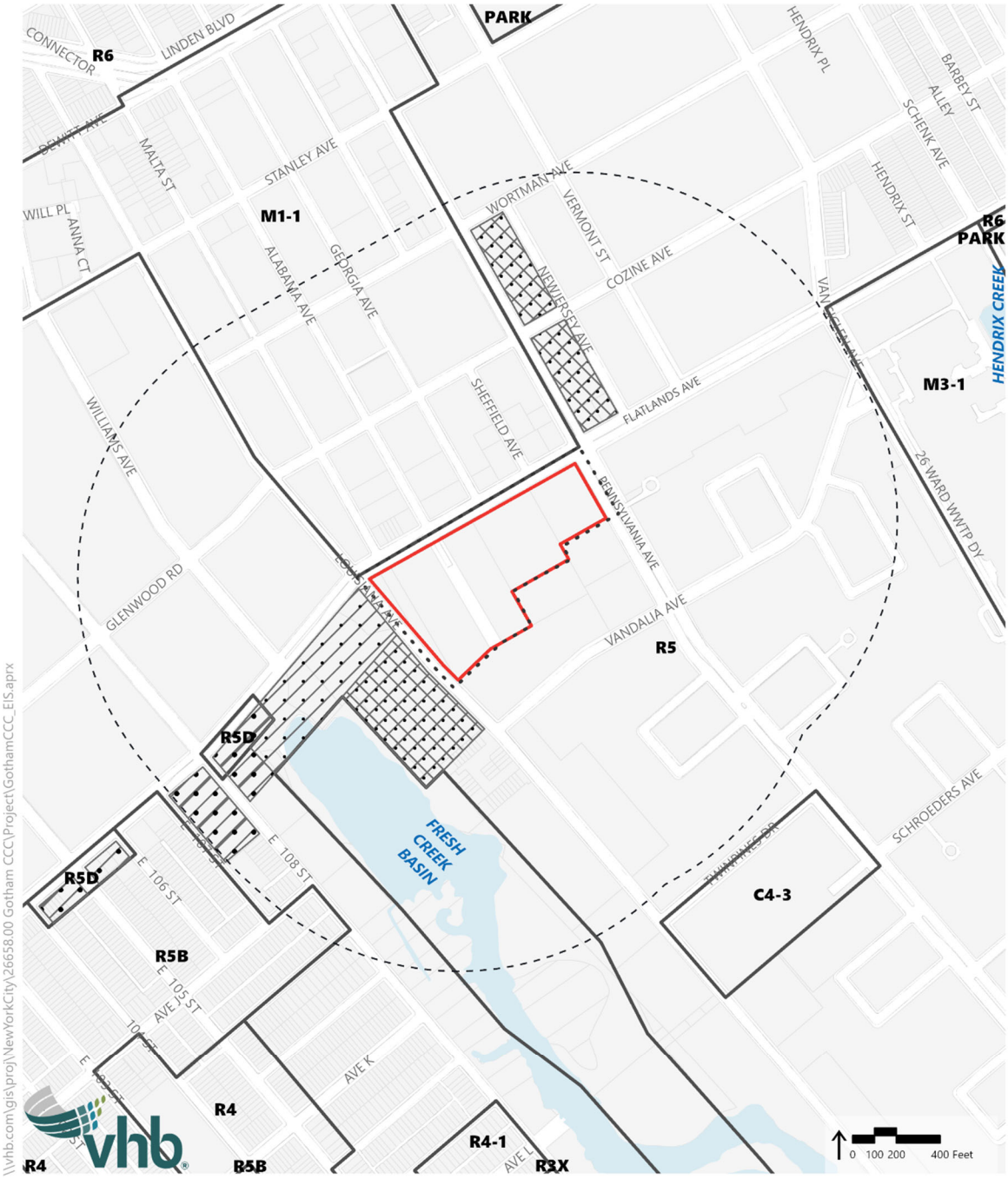


Figure 5 Proposed Zoning Map

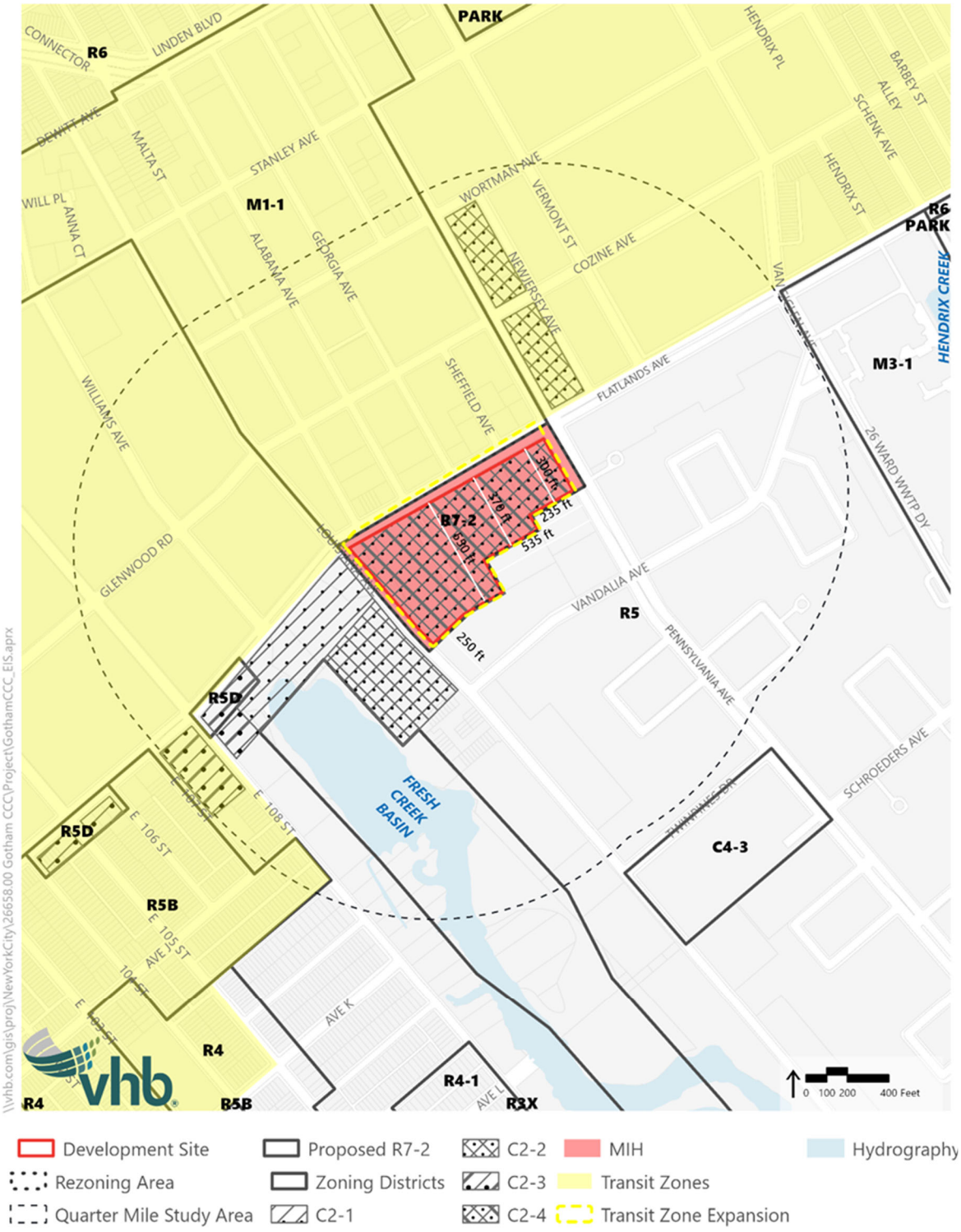
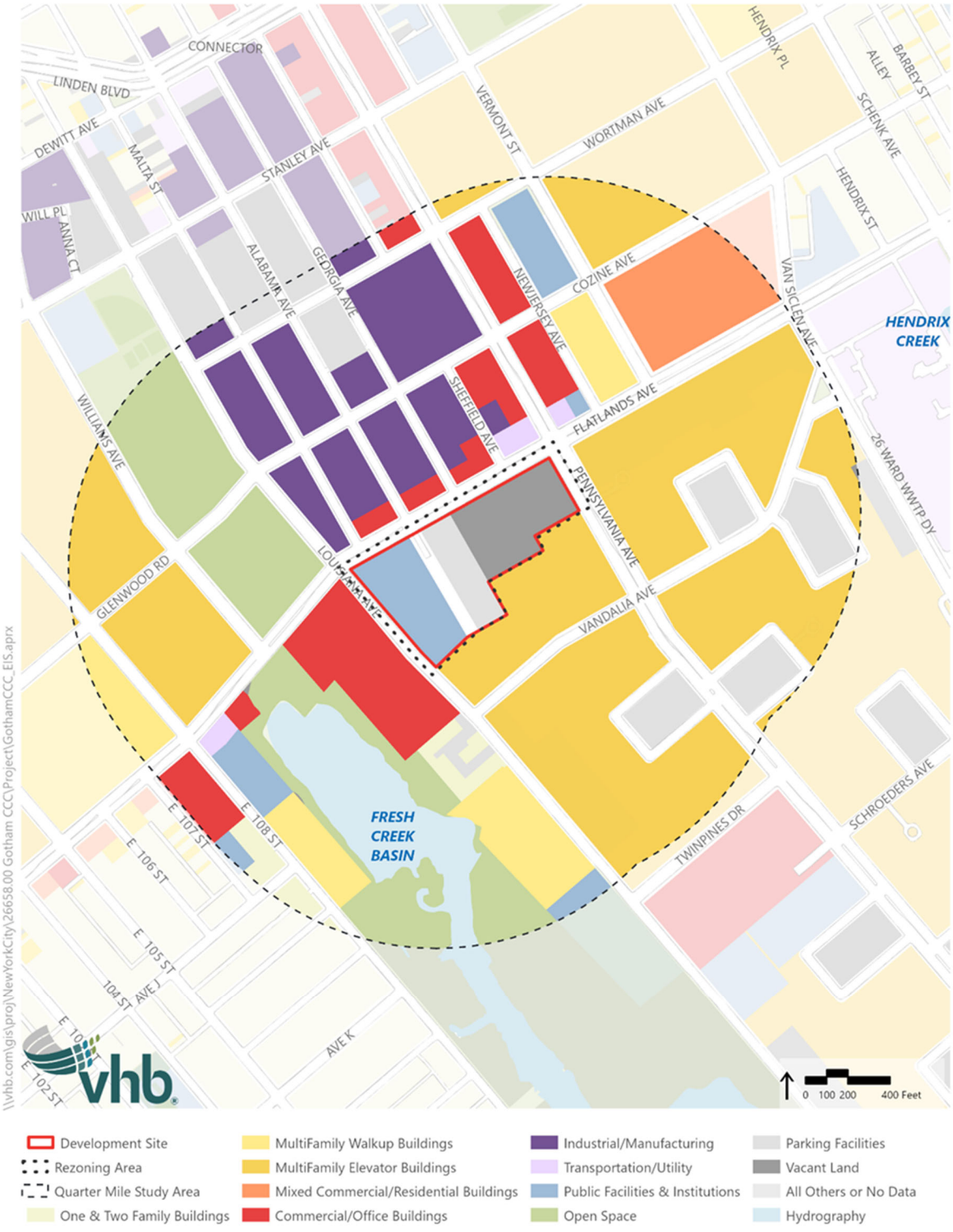


Figure 6 Land Use Map



Task 3: Socioeconomic Conditions

The socioeconomic character of an area includes its population, housing, and economic activity. Socioeconomic changes may occur when a project directly or indirectly changes any of these elements. Although socioeconomic changes may not result in impacts under CEQR, they are disclosed if they would affect land use patterns, low-income populations, the availability of goods and services, or economic investment in a way that changes the socioeconomic character of the area.

According to the *CEQR Technical Manual*, the six principal issues of concern with respect to socioeconomic conditions are whether a proposed project would result in significant impacts due to: (1) direct residential displacement; (2) direct business displacement; (3) indirect residential displacement; (4) indirect business displacement due to increased rents; (5) indirect business displacement due to retail market saturation; and (6) adverse effects on a specific industry. As described in Part II, Section 1.2 of the EAS, indirect residential displacement will be evaluated in the EIS because the ~~proposed project~~Proposed Project would exceed the threshold of 200 residential units for conducting a preliminary residential displacement assessment. The scope of work for this analysis is described below. The other five issues of concern are either not applicable to the ~~proposed project~~Proposed Project, or the project would not meet the threshold for a preliminary assessment.

Indirect Residential Displacement

The concern with respect to indirect residential displacement is whether the ~~proposed project~~Proposed Project—by introducing a substantial new development that is markedly different from existing uses, development, and activities within the neighborhood—could lead to increases in property values, and thus rents, making it more difficult for some residents to afford their homes. The objective of the indirect residential displacement assessment is to determine whether the ~~proposed project~~Proposed Project would either introduce a trend or accelerate a trend of change in socioeconomic conditions that may potentially displace a vulnerable population to the extent that the socioeconomic character of the neighborhood would change.

The indirect residential displacement analysis will use the most recent available U.S. Census data, as well as current real estate market data, to present demographic and residential market trends and conditions within a ~~¼-~~half-mile study area. This information will include population estimates, housing tenure and vacancy status, median housing value and rent, median household income, and a discussion of rent-protected housing. The preliminary assessment will consist of a step-by-step evaluation, as described in the *CEQR Technical Manual,* to determine whether the ~~proposed project~~Proposed Project would add substantial new population with higher incomes as compared with the income of the study area population and evaluate whether the study area has already experienced a readily observable trend toward increasing rents.

The preliminary analysis would include the following steps, as described in Section 322.1 of the *CEQR Technical Manual:*

› Determine if the ~~proposed project~~Proposed Project would add new population with higher average incomes compared to the average incomes of the existing populations and any new population expected to reside in the study area without the project.

- Determine if the project's increase in population is large enough relative to the size of the population expected to reside in the study area without the project to affect real estate market conditions in the study area.
- Consider whether the study area has already experienced a readily observable trend toward increasing rents and the likely effect of the action on such trends.

If the preliminary assessment reveals the potential for the ~~proposed project~~Proposed Project to introduce a trend of change in socioeconomic conditions, a detailed analyses will be conducted in accordance with the *CEQR Technical Manual,* if warranted.

Task 4: Community Facilities and Services

The demand for community facilities and services is directly related to the type and size of the new population generated by the development resulting from the proposed actions. New workers tend to create limited demands for community facilities and services, while new residents create more substantial and permanent demands.

The *CEQR Technical Manual* recommends a detailed analysis of indirect impacts on police, fire, and healthcare services in cases where the ~~proposed project~~Proposed Project would either introduce a sizeable new neighborhood where one has not previously existed or displace or alter an existing facility. As described in **Part II, Section 1.3 of the EAS**, the ~~project site~~Development Site is located in a developed area that is served by existing police, fire, and healthcare services; as such, the ~~proposed project~~Proposed Project would not create a neighborhood where none existed before. In addition, it would not displace or alter any police, fire, or healthcare facilities. Therefore, the ~~proposed project~~Proposed Project does not have the potential to result in significant adverse environmental impacts related to police, fire, and healthcare services, and no further analysis is warranted.

The ~~proposed project~~Proposed Project would result in the development of up to 2,~~118~~050 residential units. This would exceed the minimum number of units that would trigger a detailed analysis of libraries under the *CEQR Technical Manual;* in Brooklyn, this number is ~~734~~731. Therefore, further analysis of libraries will be included in the EIS (see "Libraries" below).

In Brooklyn, the threshold for an analysis of child care is 110 affordable non-senior units. Under the ~~applicant's~~Applicant's proposed scenario, ~~in which 267 of the 2,118 total units~~the project would introduce approximately 1,538 residential units for families making less than 80 percent of AMI. Because 200 units would be exclusively for use by seniors, the ~~project~~ Proposed Project is estimated for analysis purposes to introduce approximately 1,~~388~~338 non-senior residential units ~~for families making less than 80 percent of Area Median Income (AMI).~~. Therefore, an analysis of child care services will be undertaken in the EIS (see "Child Care" below).

The threshold for detailed analysis of school impacts is the number of units that would generate a total of at least 50 elementary/intermediate school students or at least 150 high school students. The proposed 2,~~118~~050 units would exceed the thresholds for both elementary/intermediate schools and high schools, either with or without consideration of the senior/supportive units. Using SCA 2019 multipliers, under the scenario excluding the proposed ~~267~~200 senior supportive units, the ~~proposed project~~Proposed Project is estimated to generate ~~333~~334 elementary school students, 148 intermediate school

students, and ~~92~~93 high school students. ~~Under the scenario in which no units would be reserved exclusively for the use of seniors, the proposed project is estimated to generate approximately 382 elementary school students, 170 intermediate school students, and 106 high school students.~~ Accordingly, an analysis of the project's effects on schools will be undertaken in the EIS (see "Public Schools" below).

Libraries

As discussed above, the ~~proposed project~~Proposed Project would exceed the threshold of ~~734~~731 residential units for analysis of library services. The project would not displace or alter any library facilities; therefore, an indirect analysis will be conducted to assess increased demand on library services. The analysis will describe existing libraries within the study area, their information services, and their user population, as well as information on the services provided, levels of utilization, and branch holdings of books and other media. An estimate of holdings per resident will then be calculated for the No-Action condition, based on future population in the study area and anticipated growth in the library system. Impacts will be assessed by adding the project-generated population to the No-Action population and determining the project's effects on the library's ability to provide information services to its users based on change in holdings per resident compared to the No-Action condition. If significant adverse impacts are identified, feasible mitigation measures (if any) will be identified to avoid or reduce these impacts.

Child Care

As discussed above, the ~~proposed project~~Proposed Project would exceed the threshold of 110 low-income units in Brooklyn for analysis of ~~child care~~childcare services. Accordingly, a detailed analysis of child-care services will be included in the EIS. The analysis will include the following:

- Existing publicly funded group ~~child care~~childcare facilities will be identified within approximately 1.5 miles of the ~~project area~~Development Site.
- Using publicly available information from the Administration for Children's Services' (ACS) Division of Child Care and Head Start (CCHS) or from the New York City Department of Education, each facility will be described in terms of its location, number of slots (capacity), and existing enrollment.
- Any expected increases by the analysis year in the population of children under age 6 within the eligibility income limitations for publicly funded ~~child care~~childcare services, based on CEQR methodology, will be assessed for the No-Action condition. This information will be used to determine the projected capacity or resulting deficiency in child-care "slots" and the utilization rate for the study area.
- The With-Action demand will be calculated by adding the estimated number of eligible children generated by the ~~proposed project~~Proposed Project to the projected No-Action demand and calculating the effect on the number and utilization rate of ~~child care~~childcare slots. This calculation will take into account the ~~child care~~childcare facilities proposed as part of the project.
- The significance of the project impact will be assessed based on methods identified in the *CEQR Technical Manual*. A significant adverse impact may result if the project would result in a collective ~~child care~~childcare/Head Start utilization rate of 100 percent or

more, and an increase of 5 percent or more in utilization rate between the No-Action and With-Action scenarios.

› If necessary, mitigation measures will be considered to address any significant adverse impacts.

Public Schools

As discussed above, the ~~proposed project~~Proposed Project would exceed the thresholds for analyses of elementary/intermediate schools and high schools. Accordingly, detailed analyses of elementary/intermediate and high schools will be included in the EIS. The analysis will include the following:

› The primary study area for the analysis of elementary and intermediate schools is the community school district sub-district in which the project is located. The ~~development site~~Development Site is located within Community School District (CSD) 19, Sub-district 3, which will serve as the study are for the analysis of elementary schools and intermediate schools. The primary study area for the analysis of high schools is the borough in which the ~~development site~~Development Site is located – in this case, Brooklyn. An analysis of the ~~proposed project's~~Proposed Project's potential impact on elementary and intermediate schools at the sub-district level, and high schools at the borough level, will be performed.

› Public elementary and intermediate schools serving CSD 19, Sub-district 3 and high schools serving Brooklyn will be identified and located. Existing capacity, enrollment, and utilization data for all public elementary/ intermediate schools and high schools within the affected sub-district and borough, respectively, will be provided for the current (or most recent) school year, noting any specific shortages of school capacity using information from the New York City Department of Education (DOE).

› Conditions that would exist in the No-Action condition for the sub-district and the borough will be identified, taking into consideration projected changes in future enrollments, including those associated with other developments in the affected sub-district, using the NYC School Construction Authority's (SCA) *Projected New Housing Starts*. Plans to alter school capacity either through administrative actions on the part of the DOE or as a result of the construction of new school space prior to the 2031 analysis year will also be identified and incorporated into the analyses. Planned new capacity projects from the DOE's *2020-2024 Five Year Capital Plan* may be included in the quantitative analysis per consultation with SCA and DCP or in a qualitative discussion.

› With-Action conditions will be analyzed, adding students likely to be generated by the ~~proposed project~~Proposed Project to the projections for the No-Action condition. Impacts will be assessed based on the difference between the With-Action projections and the No-Action projections at the sub-district level for elementary and intermediate school students, and at the borough level for high school students, for enrollment, capacity, and utilization in 2031.

› A determination of whether the ~~proposed project~~Proposed Project would result in significant adverse impacts to public schools will be made. A significant adverse impact may result, warranting consideration of mitigation, if the ~~proposed project~~Proposed Project would result in: (1) a collective utilization rate of elementary, intermediate, and high schools in the sub-district study area and borough, respectively, that is equal to or

greater than 100 percent in the With-Action condition; and (2) for elementary and intermediate schools, an increase of ~~five percent~~100 or more ~~in~~new students generated from the ~~collective~~ Proposed Project past the 100 percent utilization rate~~ between the No-Action and With-Action conditions~~. If impacts are identified, further analysis would be required to determine the number of dwelling units that may be constructed before a significant adverse impact would occur. If significant adverse impacts are identified, feasible mitigation measures (if any) will be identified to avoid or reduce these impacts.

Task 5: Open Space

An open space assessment is warranted if a project would have a direct effect (the elimination or alteration of open space) or an indirect effect on open space through population size (overtaxing existing open space through an increase in population).

~~The proposed project is located in an area that is considered to be neither underserved nor well-served by open space. For projects in such areas, an~~An assessment of indirect effects on open space is conducted if ~~the~~a proposed project would generate more than 200 residents or 500 workers. The ~~proposed project~~Proposed Project is expected to introduce approximately 4,~~087~~797 additional residents, while new retail, community facility, and educational uses would result in an additional ~~525~~480 workers. Therefore, residential and nonresidential open space assessments will be provided in the EIS.

The open space analysis will consider both passive and active open space resources. Passive and active open space ratios will be assessed in the residential study area (~~1/2~~half-mile radius) and non-residential area (~~1/4~~quarter-mile radius; this may be modified if appropriate). The study area would generally comprise those census tracts that have 50 percent or more of their area located within the applicable radius of the ~~project site~~Development Site, as recommended in the *CEQR Technical Manual*. Existing open spaces within the study area will be identified and described. The open space ratio in the study area will then be calculated for the No-Action condition by dividing the acres of open space by the residential and non-residential population. For the With-Action condition, the ratio will be calculated by adding the residential and non-residential population of the ~~proposed project~~Proposed Project to the No-Action totals and by adding the ~~proposed project's~~Proposed Project's new publicly accessible open space to the No-Action open space.

If the open space ratio would increase or remain substantially the same in the With-Action condition compared to the No-Action condition, no further analysis of open space would be needed. If the results of the preliminary open space assessment indicate the need for further analysis, a detailed analysis will be conducted. This analysis would consist of the following tasks:

- Characterize the study area population by age group, both as total people and percentages of the population
- Identify and describe study area open spaces through data collection and site visits to determine types of facilities, utilization levels, accessibility, and current conditions.
- Use the data gathered in the first two tasks to assess the adequacy of the existing open space relative to the needs of study area users. This would include a quantitative and qualitative assessment that involves calculating active and passive open space ratios for

residential and nonresidential populations; considering the effects of air quality, noise, shadows, wind, access, and safety issues on the usability of existing open spaces; determining whether the proportion of active and passive open space is appropriate for the population and age group served; and considering other data, including facility condition, utilization levels, and other factors that may encourage or deter park use.

- Assess the adequacy of open space for No-Action and With-Action conditions, taking into account expected future changes in residential and nonresidential population and open space (including open space that would be provided by the ~~proposed project~~Proposed Project).
- Assess the availability of particular types of open space for particular age groups. In conducting this assessment, the analysis focuses on where shortfalls in open space exist now (or in the future), to identify whether the shortfalls are a result of the project. For the With-Action condition, the analysis will also consider potentially significant project-related impacts such as shadow, air quality, and noise effects.

If the project would result in a significant adverse impact (e.g., would significantly increase shadows, noise, or air pollutant emissions; would reduce the open space ratio by more than 5 percent in an area currently below the City's median community district open space ratio of 1.5 acres per 1,000 residents; or would result in conflicts in open space utilization or a specific user group being underserved), potential on-or off-site mitigation would be identified and assessed.

Task 6: Shadows

A shadows analysis assesses whether new building mass resulting from the proposed actions would cast shadows on sunlight-sensitive publicly accessible resources or other resources of concern, such as natural resources, and evaluates the significance of their impact. Generally, the potential for shadow impacts exists if a project would result in new structures or additions to buildings resulting in structures over 50 feet in height that could cast shadows on important natural features, publicly accessible open space, or on historic features that are dependent on sunlight.

The ~~proposed project~~Proposed Project would result in several structures greater than 50 feet in height and is located near the Breukelen Ballfields and Fresh Creek, both sunlight-sensitive resources as defined by CEQR. To analyze the potential for significant adverse shadow impacts, the EIS will include a detailed shadow analysis based on the building envelopes (including bulkheads) proposed as part of the land use actions to identify the worst-case shadowing effects of the ~~proposed project~~Proposed Project on sunlight-sensitive resources. The EIS will disclose the range of shadow impacts, if any, which are likely to result from the ~~proposed project.~~Proposed Project. The shadows analysis will include a Tier 1 through Tier 3 screening assessment to identify whether shadows cast by the ~~proposed project~~Proposed Project could reach sunlight-sensitive resources at any time of year and, if so, whether the incremental shadow would be likely to cause a significant adverse impact on the resource.

- A Tier 1 Screening Assessment will be conducted to determine the longest shadow study area for the RWCDS, which is defined as 4.3 times the height of a structure (the longest shadow that would occur on December 21, the winter solstice). A base map that

illustrates the location of the ~~project site~~Development Site in relation to the sunlight-sensitive resources and displays topographic information will be developed.

- A Tier 2 Screening Assessment will be conducted if any portion of a sunlight-sensitive resource lies within the longest shadow study area. The Tier 2 assessment will determine the areas that cannot be shaded by projected developments, which in New York City is the area that lies beyond 108 degrees either side of true north from the southern-most portion of the ~~project area~~Development Site.
- If any portion of a sunlight-sensitive resource is within the area that could be potentially shadowed by the RWCDS massing, a Tier 3 Screening Assessment will be conducted. The Tier 3 Screening Assessment will determine if shadows from the RWCDS can, in absence of intervening buildings, reach a sunlight-sensitive resource on December 21 (the winter solstice), March 21/August 21 (the spring/fall equinox), May 6 (half-way between the equinoxes and the summer solstice), or June 21 (the summer solstice). The projected shadow will be modeled with a three-dimensional computer modeling software with the capacity to accurately calculate sun angles and shadows that could be cast by the ~~proposed project~~Proposed Project to determine the extent and duration of new shadows that would be cast on sunlight-sensitive resources as a result of the ~~proposed project.~~Proposed Project. A summary table would list the shadow entry and exit times for each sunlight sensitive resource on each representative analysis day that would occur on the representative analysis days in the absence of intervening buildings.

If the Tier 1 through Tier 3 analysis indicates the need for a detailed shadows analysis, the EIS will include an analysis that will take into account shadow from existing buildings. This analysis would include the following subtasks:

- The baseline condition (No-Action Condition) would be established through the use of a three-dimensional modeling program that accounts for the No-Action shadows condition. The No-Action shadows condition would be compared to the future shadows conditions that would result from the ~~proposed project~~Proposed Project (With-Action condition). The analysis would illustrate the shadows cast by existing or future buildings and distinguish the additional (incremental) shadow projected to be cast by the RWCDS.
- The detailed analysis would be documented with graphics comparing No-Action and With-Action shadows on sunlight-sensitive resources that warrant detailed analysis. Graphics will illustrate the shadows that result in the No-Action condition and the shadows projected to result in the With-Action condition, with incremental shadow outlined in a contrasting color. A summary table listing the entry and exit times and total duration of incremental shadow on each applicable representative day for each affected resource would be provided.
- The significance of any shadow impacts on sunlight-sensitive resources will be assessed. If any significant adverse shadow impacts are identified, mitigation strategies will be identified and assessed.

Task 7: Historic and Cultural Resources

This chapter will assess the potential for the ~~proposed action~~Proposed Actions to result in significant adverse impacts on cultural resources, including both archaeological (below ground) and architectural (above ground) resources. Cultural resources are properties (such

as buildings, structures, landscapes, and archaeological sites) that are designated as New York City Landmarks (NYCLs) and Historic Districts; calendared for consideration as NYCLs by the New York City Landmarks Preservation Commission (LPC) or determined eligible for NYCL designation (NYCL-eligible); listed on the State and National Register of Historic Places (S/NR) or formally determined eligible for S/NR listing (S/NR-eligible), or contained within a S/NR listed or eligible district; recommended by the New York State Board for listing on the S/NR; and National Historic Landmarks (NHLs). Also included are potential historic and archaeological resources (i.e., properties not identified by one of the programs listed above, but that appear to meet their eligibility requirements). Archaeological resources are physical remains, usually subsurface, of the prehistoric, Native American, and historic periods—such as burials, foundations, artifacts, wells, and privies. Architectural resources generally include historically important buildings, structures, objects, sites, and districts.

According to the *CEQR Technical Manual,* a historic and cultural resources assessment is required if there is the potential to affect either archaeological or architectural resources. The New York City Landmarks Preservation Commission (LPC) has reviewed the project and found that there are no properties with architectural or archaeological significance within the ~~project area.~~Development Site. In addition, a preliminary search of the New York State Office of Parks, Recreation, and Historic Preservation Cultural Resource Information System and LPC online resources identified no architectural resources within 400 feet of the ~~project site~~Development Site that would need to be considered for contextual effects. However, the potential exists for new historic and cultural resources to be identified between the time of the preparation of this EAS and the publication of the Final EIS. Therefore, a preliminary assessment will be prepared to determine whether any new archaeological or architectural resources are present in the study area. If the assessment identifies the potential for the project to result in significant adverse impacts to historic and cultural resources, a detailed assessment may be included in the EIS, in accordance with Chapter 9 of the *CEQR Technical Manual*.

Task 8: Urban Design and Visual Resources

Urban design is the totality of components that may affect a pedestrian's experience of public space. An assessment of urban design and visual resources is appropriate when there is the potential for a pedestrian to observe, from the street level, a physical alteration beyond that allowed by existing zoning. The ~~proposed project~~Proposed Project would introduce up to ~~13~~ten new buildings, the above grade public parking garage, and the PAC— ranging in height from ~~2~~two to ~~17~~15 stories in an area currently occupied by surface parking areas and a ~~2~~two-story house of worship~~,~~ —resulting in a physical change to the streetscape that will change the pedestrian experience. Therefore, an assessment of urban design and visual resources will be provided in the EIS.

The preliminary assessment will determine whether the ~~proposed project~~Proposed Project would create a change to the pedestrian experience that is sufficiently significant to require greater explanation and further study. Because of the amount and scale of development in the ~~proposed project~~Proposed Project and the fact that it would make substantial alterations to the streetscape by noticeably changing the scale of buildings and introducing a new private but publicly accessible street network, it is anticipated that a detailed analysis will be warranted. This analysis will describe the ~~proposed project~~Proposed Project in terms of how

it would affect the area's defining elements of urban design in the With-Action condition compared to the No-Action condition. The significance of any impacts will be determined by considering the degree to which the project will change the built environment's arrangement, appearance, or functionality and whether the change would negatively affect a pedestrian's experience of the area. If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

Task 9: Natural Resources

As defined in the *CEQR Technical Manual,* a natural resource is a plant or animal species and any area capable of providing habitat for plant and animal species or capable of functioning to support environmental systems and maintain the City's environmental balance (e.g., surface and groundwater, wetlands, landscaped areas, gardens, and built structures used by wildlife). An assessment of natural resources is appropriate if a natural resource exists on or near the ~~project site~~Development Site, or if there is a potential for impacts related to stormwater and shadows. There are no natural resources present ~~on~~in the ~~project site~~Development Site; however, the ~~proposed project~~Proposed Project would create new impervious surfaces that would generate additional stormwater runoff, and may have the potential to cast shadows on Fresh Creek and the Fresh Creek Nature Preserve. In addition, the ~~site~~Development Site is within the Jamaica Bay Watershed, Therefore, the effect of the proposed actions on natural resources will require further analysis to determine whether they may result in significant adverse impacts on these resources.

The assessment of natural resources will include an evaluation of stormwater runoff from the proposed site, including flow rates and volumes and pollutant loadings, to determine whether the alteration of on-site hydrology and the creation of new impervious surface could result in adverse impacts on receiving waters. This evaluation will use information from Task 10, Water and Sewer Infrastructure, and will consider proposed stormwater collection and treatment methods as well as the ~~project's~~Proposed Project's consistency with the Jamaica Bay Watershed Management Plan. The assessment will also identify areas of Fresh Creek Nature Preserve that may be affected by project-~~caused~~generated shadows and determine whether shading impacts would result in any impairment of habitat functions and values in the preserve. If significant adverse impacts to natural resources are identified, mitigation measures to avoid or reduce these impacts would be evaluated.

Task 10: Hazardous Materials

A hazardous materials assessment determines whether the ~~proposed project~~Proposed Project may increase the exposure of people or the environment to hazardous materials, and, if so, whether this increased exposure would result in potential significant public health or environmental impacts. The potential for significant impacts related to hazardous materials can occur when: (a) elevated levels of hazardous materials exist on a site and the project would increase pathways to human or environmental exposures; (b) a project would introduce new activities or processes using hazardous materials and the risk of human or environmental exposure is increased; or (c) the project would introduce a population to potential human or environmental exposure from off-site sources. The presence or likely presence of any hazardous substance or petroleum products on a site under conditions that indicate an existing release, past release, or a material threat of release of any hazardous

substances or petroleum products into structures on the property or into the ground, ground water, or surface water of the property is known as a Recognized Environmental Condition (REC), which must be disclosed under CEQR.

As described in **Part II, Section 1.9 of the EAS**, a portion of the ~~development site~~Development Site (Block 4434, Lot 10, located on the corner of Flatlands Avenue and Pennsylvania Avenue) has been admitted into the NYSDEC Brownfield Cleanup Program. This area has undergone Phase I and Phase II Environmental Site Assessments (ESAs) and has been found to contain semi volatile organic compounds (SVOCs), pesticides, PCBs, and metals at concentrations exceeding the NYSDEC Restricted Use Soil Cleanup Objectives (RUSCOs). A Remedial Investigation Work Plan (RIWP) has been prepared for the site and will be implemented pursuant to the Brownfield Cleanup Agreement (BCA) executed between NYSDEC and Innovative Urban Living, LLC on May 15, 2019. The RIWP identifies additional work required to characterize contamination present at the site, including geophysical survey, soil and groundwater investigations, and soil vapor investigation. A Phase I and, if necessary, a Phase II ESA will also be performed for the remainder of the ~~site.~~Development Site. The EIS will summarize the results of all investigations on the site and document any identified RECs and associated cleanup actions. It is anticipated that a site-specific Construction Health and Safety Plan (CHASP) will also be prepared and submitted along with the RIWP. If warranted, an (E) designation would be established as part of the ~~proposed actions~~Proposed Actions to ensure that appropriate measures are implemented to achieve the needed remediation.

Task 11: Water and Sewer Infrastructure

As outlined in the *CEQR Technical Manual*, this section of the EIS assesses whether the ~~proposed project~~Proposed Project has the potential to adversely affect the City's water distribution or sewer system and, if so, whether those impacts are significant. As described in the EAS, based on average water consumption levels, the ~~proposed project~~Proposed Project is not expected to exceed the threshold of 1 million gallons per day that would require a preliminary infrastructure assessment of water supply.

With regard to wastewater and stormwater conveyance, the ~~proposed project~~Proposed Project is within the service area of the 26th Ward Wastewater Treatment Plant (WWTP), which is located approximately 0.6 mile east of the ~~project site.~~Rezoning Area. The ~~site~~Rezoning Area is in an area that is currently being upgraded from combined to separated sewers as part of the Fresh Creek High Level Storm Sewers project. The threshold for a preliminary infrastructure analysis in areas served by combined sewer in an R5 zone is 50 residential units. The number of residential units proposed by the project therefore triggers a preliminary infrastructure assessment for wastewater and stormwater conveyance and treatment. In addition, since the existing undeveloped portion of the ~~site~~Development Site is unpaved, development on the site would increase impervious surface area within the Jamaica Bay watershed and near Fresh Creek.

The preliminary infrastructure assessment will:

› Identify the existing wastewater and stormwater conveyance systems and treatment facilities in the study area.

- Determine existing and future wastewater flows from the site, using Table 13-2 in the *CEQR Technical Manual*, and evaluate the incremental effect of wastewater flows from the project on the capacity of conveyance facilities and the WWTP. Any potential new sewer upgrades or installations required as a result of the ~~proposed project~~Proposed Project will be identified.
- Evaluate stormwater drainage patterns, anticipated changes in volumes, and runoff rates using available data from DEP and considering future conditions. The new development will need to be in conformance with DEP requirements, including those of DEP's site connection approval process and with DEP's Long-Term Control Plan for Jamaica Bay. The analysis will identify best management practices (BMPs) to be incorporated into the project to manage stormwater runoff.

If the preliminary infrastructure assessment indicates that discharges from the ~~proposed project~~Proposed Project would impact sewer system capacity or increase pollutant loadings in stormwater, a detailed assessment may be required in accordance with Chapter 13 of the *CEQR Technical Manual*. If necessary, this assessment could include:

- Conducting a hydraulic analysis to determine whether the existing storm and sanitary sewer systems have capacity to serve the ~~proposed project~~Proposed Project.
- If the lead agency with DEP's consultation determines that the project's increased combined sewer flows and volumes have the potential to exacerbate CSO volumes or frequency, modeling discharge volumes and frequencies for each combined sewer outfall in the affected catchment area.
- Estimating pollutant types and loadings due to increased volumes of separate storm sewer discharges or CSOs.

If significant adverse impacts are identified, potential mitigation strategies would be assessed to reduce or eliminate, to the greatest extent practicable, the effects caused by the ~~proposed project.~~Proposed Project.

Task 12: Solid Waste and Sanitation Services

The *CEQR Technical* Manual states that an assessment of solid waste and sanitation services is warranted if an action would have the potential to result in a substantial increase in solid waste production that could overburden available waste management capacity or otherwise be inconsistent with the City's Solid Waste Management Plan (SWMP) or with state policy related to the City's integrated solid waste management system. According to the *CEQR Technical Manual*, actions resulting in substantial waste generation, defined as 50 tons (100,000 pounds) per week or more, warrant additional analysis for effects on solid waste and sanitation services.

Based on the average daily solid waste generation rates provided in Table 14-1 of the *CEQR Technical Manual*, it is estimated that the ~~proposed project~~Proposed Project would result in in incremental solid waste generation of approximately 65 tons (130,836 pounds) of solid waste per week. The analysis will identify proposed locations and storage methods for residential and commercial refuse and recyclables, identify the volume of refuse and recyclables (if any) that would occupy the sidewalk and for what time periods, and evaluate whether the incremental increase in solid waste would require additional garbage trucks or

other sanitation services. The analysis will also consider the ~~project's~~Proposed Project's consistency with the City's SWMP.

Task 13: Transportation

This section of the EIS will evaluate whether the ~~proposed project~~Proposed Project would create significant impacts on vehicular traffic, parking, transit services, pedestrian circulation, or vehicular and pedestrian safety. Should significant impacts be identified per *CEQR Technical Manual* criteria, the EIS will evaluate transportation system improvements to mitigate those impacts. ~~Shuttle service is being proposed as part of the project and will be discussed in this section; shuttle service operations (including service frequency and pick-up/drop-off locations) and effects on the transportation analysis will be discussed in coordination with MTA/New York City Transit and the New York City Department of Transportation.~~ The transportation analysis will include the subtasks outlined below.

Travel Demand Analysis

Trip generation projections will be developed by travel mode for each of the land uses comprising the ~~proposed project~~Proposed Project, using trip generation rates, temporal distributions, modal splits, average vehicle occupancies, and in/out splits that are published in the *CEQR Technical Manual* ~~or in~~, previously-conducted EISs or EASs, ~~or databases available from~~U.S. Census data, and other professional reference materials such as the Institute of Transportation Engineers' (ITE) ~~or other professional reference materials~~*Trip Generation* publication. This will be done for the weekday AM, midday, and PM peak periods, and for the Saturday and Sunday peak periods to be determined in coordination with New York City Department of City Planning and New York City Department of Transportation~~.~~ (NYC DOT).

A Level 1 screening assessment will be prepared to determine whether the ~~proposed actions~~Proposed Actions would generate vehicle, transit, and/or pedestrian trip levels that would exceed the thresholds outlined in the *CEQR Technical Manual*. The Level 1 screening assessment will disclose projected peak hour person trips, vehicle trips, transit trips, and pedestrian trips for the four analysis periods.

A Level 2 screening assessment will be prepared for vehicular, transit, and pedestrian trips. This will include the distribution and assignment of trips through the study area's roadway network, subway and bus services, and pedestrian network, and the identification of the specific intersections and subway and bus lines that would require ~~a detailed quantitative analyses.~~ detailed quantitative analyses. Shuttle service to nearby subway stations is being proposed as part of the Proposed Project and will be discussed in this section; shuttle service operations (including service frequency and pick-up/drop-off locations) and effects on the transportation analysis will be discussed in coordination with MTA/New York City Transit and NYC DOT.

A Travel Demand Analysis (TDA) Technical Memorandum ~~will be~~has been prepared that documents the assumptions and analysis findings. The TDA Technical Memorandum ~~will provide~~provides the framework of assumptions for the analysis that will be undertaken in the EIS~~. A draft of the memo~~ and is ~~provided~~included as ~~an attachment to this Draft Scope of Work~~**Appendix C**.

Traffic Analysis

The EIS will provide a detailed traffic analysis focusing on the peak hours analyzed in the TDA Technical Memorandum and street network intersections where the highest concentration of project-generated demand would occur. The following outlines the anticipated scope of work for the traffic analysis:

- Define a traffic study area ~~consistent with the *CEQR Technical Manual* guidelines of~~ based on the TDA Memorandum findings, which will consist of critical intersections along logical traffic routes to and from the ~~project site,~~Development Site and ~~critical locations~~ within the ~~project site~~Development Site vicinity. ~~Traffic~~Through coordination with NYC DOT and DCP, the traffic study area will include 13 intersections ~~will be identified primarily~~located along the principal roadways – ~~Flatbush~~Flatlands Avenue, Pennsylvania Avenue, and Louisiana Avenue – ~~based on CEQR screening analysis. Depending on the project design and preliminary analysis results, one or more of the four new~~identified in the TDA Technical Memorandum. Three additional proposed intersections created by the private street network ~~may~~will also be evaluated.
- Conduct intersection through and turning movement counts at each of the analysis locations during the weekday AM, midday, and PM peak periods, the Saturday midday/afternoon period, and Sunday peak period (corresponding with church services). Automatic Traffic Recorder (ATR) machine counts will also be conducted for a full week and two weekends and will be used to determine if the one-day manual counts need to be adjusted for average weekday conditions. ATR machines will be placed at representative locations within the traffic study area. Field observations will be conducted of traffic operations that will be used to calibrate subsequent level of service analyses to observed field conditions. Vehicle classification counts (e.g., autos, taxis, trucks, buses) will be conducted at representative intersections within the traffic study area.
- Identify the weekday AM, midday, and PM peak hours, Saturday and Sunday peak hours and prepare traffic volume maps for each of the five traffic peak hours.
- Inventory streets and intersections for street and lane widths, lane use designations, posted parking regulations and parking maneuvers, signal phasing and timing, and other factors needed to calculate intersection capacities.
- Determine existing traffic conditions for intersections being analyzed using Highway Capacity Manual (HCM) procedures and ~~Highway Capacity Software (HCS),~~the latest approved Synchro analysis software, i.e., existing volume-to-capacity (v/c) ratios, average vehicle delays, and levels of service – for individual traffic movements and lane groups, overall approaches to the intersection, and the overall intersection.
- Develop future No-Action traffic volumes using the annual background traffic growth rate cited in the *CEQR Technical Manual* plus traffic expected to be generated by significant development projects expected to be operational by the analysis year.
- Identify any proposed changes to the street network expected to occur by the analysis year and incorporate changes to intersection capacity or operational conditions attributable to those changes.
- Determine future No-Action traffic conditions for the intersections being analyzed.

- Develop future With-Action traffic volumes by adding project-generated traffic assignments to the future No-Action traffic volumes.
- Identify proposed changes to the street network expected to occur in conjunction with the ~~proposed project~~Proposed Project, such as revised access points to the public street network, and incorporate changed capacity or operational conditions, if applicable, into the With-Action conditions analysis.
- Determine future With-Action traffic conditions for the intersections being analyzed and identify significant adverse traffic impacts, based on changes to traffic levels of service, using criteria stipulated in the *CEQR Technical Manual*.
- If significant adverse impacts are identified, identify and evaluate feasible and practical traffic improvement measures needed to mitigate these impacts.

Parking Analysis

~~Determine the~~The amount of parking demand expected to be generated by the ~~proposed project and~~Proposed Project will be determined. An assessment of whether parking to be provided as part of the ~~project~~Proposed Project would be sufficient to accommodate the demand will be conducted by comparing the quantity of proposed parking spaces to estimated levels of demand. If the parking demand analysis shows that parking provided on-site would not be sufficient to accommodate the project's demand, then a detailed parking analysis would be performed. This would consist of an inventory of existing ~~off-site~~on-street parking ~~facilities~~ within a ~~¼~~ quarter-mile radius of the ~~project site~~Development Site, per *CEQR Technical Manual* guidelines~~,~~ (no public off-street parking facilities were identified in the surrounding areas), and an assessment of the available capacity at these facilities. Future No-Action conditions would be evaluated based on the application of an annual background growth rate to the existing demand. The No-Action parking demand and supply would then be compared to the With-Action conditions, taking into account the new parking facilities developed as part of the ~~proposed project.~~Proposed Project. This information would be presented in a parking utilization table that compares the future No-Action and With-Action conditions and identifies excess capacity and/or parking shortfalls.

Transit Analysis

Subways

- Identify and describe the subway routes and stations serving the ~~development site (assumed to be~~ Development Site (the East 105th Street and Rockaway Parkway [L] and Pennsylvania Avenue [3] stations), station access facilities, hours of operation, and frequency of service. ~~If the CEQR thresholds for analysis are exceeded at any subway station, an increase of 200 or more passengers at a station, further analysis of that station will be undertaken consistent with CEQR methodologies to determine the potential for significant adverse impacts based on changes to the volume-to-capacity ratio at subway station elements (i.e. turnstiles, stairways, etc.).~~
- Identify the volume of patrons using the East 105th Street, Rockaway Parkway, and Pennsylvania Avenue subway stations, which are located closest to the ~~project site~~Development Site, based on information obtained from MTA/New York City Transit, as well as line-haul ridership data.

› Conduct pedestrian counts at the Rockway Parkway subway station turnstiles and determine the station fare controls levels of service during the weekday AM and PM commuter periods.

› Determine future No-Action and With-Action station volumes and utilization of the fare control elements, and whether there would be significant station impacts at the analysis locations under the With-Action conditions.

If the CEQR thresholds for analysis are exceeded on any individual subway route (i.e., an increase of 200 or more passengers on a single subway line), further analysis of that route will be undertaken consistent with CEQR methodologies to determine the potential for significant adverse impacts based on the changes to the subway line load levels.

Buses

› Identify and describe the bus routes and bus stops serving the ~~development site (assumed to be~~Development Site including the B82 and B82 SBS bus ~~route~~routes, which stops on Flatlands Avenue in front of the ~~project site),~~Development Site and B83 bus route, which stops on Pennsylvania Avenue, hours of operation, and frequency of service. If the CEQR thresholds for analysis are exceeded on any individual bus route (i.e., an increase of 50 or more bus passengers on a single bus line in one direction), further analysis of that route will be undertaken consistent with CEQR methodologies to determine the potential for significant adverse impacts.

› Assign project-generated bus trips to study area bus routes and stops, and determine whether there would be significant impacts on bus load levels for the B82, B82 SBS, and B83 bus ~~route~~routes based on the changes to the bus load levels, and the proposed measures needed to mitigate the potential impacts.

~~For~~Although a shuttle service to nearby subway stations is being proposed as part of the project, for the purpose of a conservative analysis~~,~~ the bus transit analysis will not assume the ~~proposed project~~Proposed Project's shuttle service; this scenario will project the worst-case conditions for MTA/New York City Transit's future bus operations projections.

Pedestrian Analysis

~~Conduct~~The EIS will provide a detailed pedestrian ~~counts~~analysis at intersections along key walking routes between the ~~development site~~Development Site and subway stations, bus stops, and other potentially affected locations in the ~~traffic~~ study area. ~~Based on CEQR criteria, these~~The following outlines the anticipated scope of work for the pedestrian analysis:

› Pedestrian counts will be conducted at intersection crosswalks, sidewalks, and corner reservoir areas during the weekday AM, midday, and PM, and Saturday ~~and Sunday~~ midday/afternoon, and Sunday (corresponding with church services) analysis periods. The pedestrian study area will include pedestrian elements at five intersections ~~which have been preliminarily~~ identified ~~to be analyzed, based on CEQR criteria, are~~in the ~~following:~~TDA Technical Memorandum.

› Establish the specific peak pedestrian hours to be analyzed for weekday AM, midday and PM, and Saturday and Sunday peak hours. Develop pedestrian volume maps for each analyzed intersection for the four traffic peak hours.

- Determine existing pedestrian conditions for the intersections being analyzed using *Highway Capacity Manual* (HCM) procedures and in accordance with *CEQR Technical Manual* protocols.
- Develop future No-Action pedestrian volumes using the annual background traffic growth rate cited in the *CEQR Technical Manual* plus pedestrian traffic expected to be generated by significant development projects expected to be operational by the analysis year.
- Identify any proposed changes to the street network expected to occur under No-Action conditions by the analysis year and incorporate resulting changed capacity or operational conditions.
- Develop future With-Action pedestrian volumes by adding project-generated pedestrian assignments to the future No Action pedestrian volumes.
- Identify proposed changes to the roadway network expected to occur in conjunction with the ~~proposed project~~Proposed Project, such as revised access points to the public street network and incorporate changed capacity or operational conditions into the future With-Action pedestrian analyses as applicable.
- Identify significant adverse pedestrian impacts, based on changes to levels of service, using criteria stipulated in the *CEQR Technical Manual*.
- If significant adverse impacts are identified, identify and evaluate feasible and practical mitigation/traffic improvement measures needed to mitigate these impacts.

Safety

This section of the EIS will include a review of vehicular and pedestrian crash data for the most recent three-year period for which such data are available, and a summary of the number and severity of crashes by year for each of the traffic study area intersections. The analysis will determine whether any of the analysis intersections are considered high ~~accident~~crash locations based on *CEQR Technical Manual* criteria and will also assess whether traffic generated by the ~~proposed project~~Proposed Project would contribute materially to safety risks at such locations. The EIS will identify potential safety improvements, if warranted.

~~Since the proposed project will include a new school, student trips will be assigned to crosswalks within the project vicinity. For intersections where an uncontrolled crosswalk are projected to have 20 or more students trips during the highest peak hour, a signal warrant analysis will be conducted to determine if a traffic signal is needed to facilitate student crossings.~~

Task 14: Air Quality

Consistent with the *2021 CEQR Technical Manual*, air quality analyses for a proposed project focus on the following areas of potential concern:

Mobile Sources

- Potential impacts from mobile sources introduced by a project.

Stationary Sources

- Potential impacts from air pollutant sources introduced by a project, such as:
  - Emissions from a project's parking facility.
  - Emissions from a project's heating, ventilation, and air conditioning (HVAC) system
- Potential impacts on the ~~proposed project~~Proposed Project from manufacturing/processing facilities
- Potential impacts on the ~~proposed project~~Proposed Project from large/major sources that are located near the ~~project site.~~ Development Site.

The EIS air quality analysis will assess the following:

- The potential for changes in vehicular travel associated with the ~~proposed development sites~~Proposed Project (analyzed under Task 12) to result in significant mobile source (vehicle-related) air quality impacts;
- The potential for significant adverse impacts from the emissions of proposed parking facility(ies).
- The potential for emissions from the HVAC systems of the ~~proposed development sites~~Proposed Project to have significantly adverse impacts on other proposed development sites (project-on-project impacts) and existing land uses and known future developments (project-on-existing impacts).
- The potential combined impacts of HVAC emissions (clusters) from the proposed buildings of approximately the same height that are located in close proximity to one another to significantly impact existing land uses/known future developments (project-on-existing impacts) and other proposed buildings (project-on-project impacts).
- The potential for significant air quality impacts on project sites from air toxic emissions generated by nearby existing industrial/manufacturing sources.

Mobile Source Analysis

Emissions resulting from project-generated traffic have the potential to significantly increase air pollutant levels at nearby sensitive land uses and proposed uses. The primary air quality issue related to the ~~proposed project~~Proposed Project is whether the traffic generated during peak traffic periods would:

- Cause or exacerbate a violation of the 1-hour or 8-hour ambient air quality standard for carbon monoxide (CO)
- Exceed the DEP CO *de minimis* criteria near any of these locations during the peak traffic period
- Exceed the NAAQS for 24-hour PM_{10} and the CEQR *de minimis* thresholds for 24-hour and annual $PM_{2.5}$

Screening Analysis

The mobile source screening analysis will be performed per Sections 210 and 311 of the *CEQR Technical Manual*. It is anticipated that the number of incremental vehicular trips introduced by the project would be higher than the *CEQR Technical Manual* CO-based screening thresholds for CO and $PM_{2.5}$. Therefore, the EIS is expected to include a detailed analysis of mobile source emissions of CO and particulate matter ($PM_{2.5}$ and PM_{10}). Two

highest impacted intersections will be selected for the mobile source analysis in consultation with DCP.

Detailed Mobile Source Intersection Analysis

For those intersections where the CEQR volume threshold would be exceeded and which were selected for the analysis, a detailed CO and/or PM_{10} and $PM_{2.5}$ analysis will be conducted using the latest versions of the EPA's MOVES emission model and ~~CAL3QHC(R)~~AERMOD dispersion model. ~~Additionally, a detailed Tier I PM ($PM_{2.5}$ and PM_{10}) analysis will be performed using the EPA's MOVES emission model and CAL3QHC(R) dispersion model for the peak hour of "worst-case" traffic condition. Traffic data (i.e., traffic volumes, vehicle classifications and traffic speeds, etc.) will be obtained from the transportation analysis performed for this EIS as described under Task 12 above, supplemented by information about road types and traffic speeds from the New York State Department of Transportation and New York Metropolitan Transportation Council (NYMTC), respectively.~~

Results of the CO, PM_{10} and $PM_{2.5}$ concentrations will be compared to the national ambient air quality standards (NAAQS) and CEQR *de minimis* criteria to determine the potential for a significant adverse mobile source impact. If exceedances are predicted, mitigation measures will be identified and applied. ~~In the event $PM_{2.5}$ *de minimis* criteria under the Tier 1 peak-hour analysis with the application of mitigation measures are exceeded, then a Tier 2 analysis will be prepared.~~

Parking Facility Analysis

The EIS will include an analysis to estimate potential air quality impacts at ~~one "worst-case" parking facility. The "worst-case" parking facility will be the parking facility that has the maximum number of vehicles entering and exiting at peak periods, and is closest to the nearest sensitive receptor (i.e. wherever there is public access or there are operable windows). It is currently anticipated that the worst-case facility would be the large structured parking facility located on the south side of the development site.~~the proposed public parking garage. The analysis will follow *CEQR Technical Manual* guidelines depending on the type of the facility to estimate vehicular emissions from within the facility and adjacent roadways. CO, PM and $PM_{2.5}$ pollutant concentrations will be estimated and compared to the NAAQS and CEQR *de minimis* criteria.

Stationary Source Analysis – HVAC Analysis

Emissions from the HVAC systems of the proposed buildings may affect air quality levels at nearby existing land uses as well as at the ~~project site~~Development Site itself. The impacts of these emissions would be a function of fuel type, stack height, building size (gross square footage), and location of each emission source relative to a nearby sensitive receptor ~~site. The *CEQR Technical Manual* includes a screening methodology to estimate the potential impacts of HVAC system emissions from a single building that is at least 30 feet from the nearest building of similar or greater height~~sites.

The analyses of the potential impacts of the Proposed ~~Action~~Actions will follow the *2021 CEQR Technical Manual* procedures~~, and the~~. The analysis will address potential impacts of the 1-hour and annual standards for nitrogen dioxide (NO_2) and the 24-hour and annual

standards for $PM_{2.5}$ for natural gas-fired HVAC systems~~, plus the SO_2 1-hour standard if No. 2 fuel oil is used. The proposed approach for determining the potential for project-on-project and project-on-existing impacts is described below.~~.

~~Screening Analysis~~

~~A screening analysis will be conducted using *CEQR Technical Manual* nomographs to determine whether the HVAC emissions of the proposed buildings would have the potential to significantly affect air quality levels at buildings within the site. Each building will be evaluated within the context of the overall site development, and sensitive receptor sites will be accounted for. If the distance from a proposed development to the nearest development of similar or greater height is less than the threshold distance provided in the *CEQR Technical Manual* nomographs, the potential exists for significant air quality impacts, and a detailed dispersion modeling analysis will be conducted. Otherwise, the development site passes the screening, and no further analysis is required. Because the project would introduce multiple buildings of similar heights, a detailed analysis will be undertaken to assess the potential for the proposed buildings to impact each other. Additionally, a survey of existing land uses within 400 feet of the project site will be conducted to identify sensitive receptors associated with existing land uses and known future developments and determine the heights of the existing buildings.~~

Detailed Dispersion Analysis

~~Detailed~~In compliance with the *CEQR Technical Manual* procedures detailed analysis will be conducted for proposed buildings~~ that do not pass the screening-level analysis~~. The analysis will examine whether the HVAC emissions of any of the proposed development sites would have the potential to significantly affect air quality levels at any of the other nearby proposed development sites and on other existing or planned sensitive uses within the surrounding area. ~~Nitrogen dioxide (NO_2) and particulate matter ($PM_{2.5}$) emissions, as well as SO_2 in the case of NO. 2 Fuel Oil being the choice of fuel, will be analyzed.~~ The analysis will be performed using the latest EPA-developed AERMOD model and will consider conditions with and without downwash. The most recent five years of meteorological data (~~2014-2018~~2016-2020) from JFK Airport will be used for these analyses.~~ Project-on-existing and project-on-project impacts will be determined.~~ Predicted values will be compared with NAAQS for NO_2 and $PM_{2.5}$, and the CEQR *de minimis* criteria for $PM_{2.5}$. ~~In the event that violations of standards are predicted, an air quality (E) designation would be proposed for the sites, describing the fuel and/or HVAC exhaust stack restrictions that would be required to avoid a significant adverse air quality impact.~~

Industrial Source (Air Toxics) Analysis

An analysis of uses in proximity of the ~~project site~~Development Site will be conducted to determine the potential for impacts from industrial/manufacturing emissions onto the sensitive receptors introduced by the ~~proposed project.~~Proposed Project.

A field survey will be performed to determine if there are any manufacturing/commercial processing facilities within 400 feet of the ~~project site.~~Development Site. In addition, a search of federal and state air permits, and the DEP's CATS and Bureau of Environmental Compliance (BEC) files will be performed to determine if there are permits for any sources of

toxic air compounds from industrial/manufacturing processes. Should any industrial permits associated with the release of air toxics be identified, permit records will be obtained from DEP.

If processing facilities are identified, an industrial stationary source air quality analysis will be performed in accordance with the *CEQR Technical Manual*. The Manual's industrial source screening procedures will be used to estimate the short-term and annual concentrations of pollutants from the permits and evaluated at sensitive receptor sites. Predicted pollutants impacts on the ~~project site~~Development Site will be compared with the short-term guideline concentrations (SGC) and annual guideline concentrations (AGC) reported in NYSDEC's DAR-1 AGC/SGC Tables guidance document to determine the potential for significant adverse impacts.

Task 15: Greenhouse Gas Emissions and Climate Change

Increased greenhouse gas (GHG) emissions are changing the global climate and are predicted to lead to wide-ranging effects on the environment, including rising sea levels, increases in temperature, and changes in precipitation levels. Although this is occurring on a global scale, the environmental effects of climate change are also likely to be felt at the local level. As described in the EAS, the ~~proposed project~~Proposed Project exceeds the 350,000-square-foot threshold for greenhouse gas emissions assessment in the *CEQR Technical Manual*. Therefore, GHG emissions generated by project operations and project-related mobile sources will be quantified, and an assessment of the project's energy consumption (using Table 15-1 of the *CEQR Technical Manual*) and consistency with the City's established GHG reduction goal will be performed as part of the EIS. Climate change resilience will be addressed as part of the Land Use task through an analysis of the ~~proposed project's~~Proposed Project's consistency with Policy 6.2 of the City's Waterfront Revitalization Program.

Task 16: Noise

Per the *CEQR Technical Manual*, a noise analysis is appropriate if an action would generate mobile or stationary sources of noise or would be located in an area with high ambient noise levels. Mobile sources include vehicular traffic; stationary sources include playgrounds, rooftop equipment, such as emergency generators, cooling towers, and other mechanical equipment.

The noise analysis will consist of several components, as described below.

Mobile Source Screening

A mobile source noise screening assessment will be conducted to determine if there is the potential for vehicular traffic generated by the ~~proposed project~~Proposed Project to result in a significant noise impact. Noise passenger car equivalent (PCE) values will be calculated for the existing, No-Action, and With-Action conditions at selected intersections based on the Transportation analysis described above. The analysis will follow the requirements of Section 332.1 of the *CEQR Technical Manual*.

If the mobile source screening determines that existing noise PCE values would be increased by 100 percent or more due to the ~~proposed project~~Proposed Project (which is equivalent to

an increase of 3 dB[A] or more), a detailed analysis will be undertaken using the Federal Highway Administration's Traffic Noise Model or Cadna-A noise prediction software. The model results would be used to evaluate the potential for noise impacts and to analyze noise mitigation measures as appropriate.

Ambient Noise Monitoring (Existing Conditions)

Noise measurements will be taken at up to six representative locations to characterize existing noise conditions in the study area. ~~This will include up to three locations representative of the new receptors that would be introduced by the project and up to three locations representative of receptors where the vehicle trips generated by the project would have the greatest potential to significantly increase ambient sound levels. If necessary, more noise measurement locations may be added to characterize the existing noise conditions. In accordance with the~~In accordance with the *2021 CEQR Technical Manual*, ambient noise measurements will be conducted for 20 minutes, since roadway noise is the predominant noise source in the study area. In conjunction with the transportation analysis, noise monitoring will be conducted during the weekday morning, midday and afternoon and Saturday and Sunday midday/afternoon peak periods. Spot traffic counts will be conducted during the sound measurements to allow the prediction of sound levels associated with the existing, No-Action, and With-Action traffic conditions analyzed in the transportation analysis.

Building Attenuation Analysis

Building sound attenuation requirements will be evaluated to maintain acceptable interior noise conditions based on the ambient noise monitoring and impact assessment results. A summary table of window-wall attenuation requirements will be developed for each building location within the ~~project site~~Development Site in accordance with CEQR acceptable interior noise level requirements. As warranted, an (E) designation would be established as part of the proposed actions, to ensure that appropriate measures are implemented to achieve the identified attenuation requirements.

Stationary Source Screening

The ~~proposed project~~Proposed Project may introduce stationary source noise generators, such as unenclosed cooling or ventilation equipment (other than single-room units), truck loading docks, playgrounds, or other similar types of sources. A qualitative assessment will be conducted to identify the types of stationary sources that would be introduced by the ~~proposed project~~Proposed Project, their general proximity to sensitive receptors, and the potential for noise impact. If specific stationary sources such as rooftop mechanical equipment are found to have the potential to cause noise impacts, a quantitative stationary source analysis will be conducted.

Task 17: Public Health

According to the *CEQR Technical Manual*, public health is the organized effort of society to protect and improve the health and well-being of the population through monitoring; assessment and surveillance; health promotion; prevention of disease, injury, disorder, disability and premature death; and reducing inequalities in health status. The goal of CEQR with respect to public health is to determine whether adverse impacts on public health may

occur as a result of a proposed project, and if so, to identify measures to mitigate such effects. According to the guidelines of the *CEQR Technical Manual*, a public health assessment may be warranted if an unmitigated significant adverse impact is identified in other CEQR analysis areas, such as air quality, water quality, hazardous materials, or noise. For the ~~proposed project~~Proposed Project, a preliminary public health assessment will be conducted that will consist of a summary of the project's potential to result in unmitigated significant adverse impacts in the areas of air quality, water quality, hazardous materials, and noise. If unmitigated significant adverse impacts are identified in any of these technical areas and the lead agency determines that a public health assessment is warranted, a detailed analysis will be provided for the specific technical area or areas.

Task 18: Neighborhood Character

The character of a neighborhood is the result of a combination of various contributing elements, including land use patterns, the scale of its development, the design of its buildings, the presence of notable landmarks, and a variety of other physical features that include traffic and pedestrian patterns and noise. This chapter of the EIS will use information from other EIS chapters to assess whether any identified significant adverse impacts in the areas of land use, zoning, and public policy; socioeconomic conditions; community facilities; open space; historic and cultural resources; urban design and visual resources; shadows; transportation; or noise would have the potential to affect neighborhood character.

Based on an evaluation of the ~~proposed project's~~Proposed Project's impacts, an assessment of neighborhood character will be prepared following *CEQR Technical Manual* methodologies. This analysis will consist of describing the predominant factors that contribute to defining the character of the neighborhood within a ~~1/4~~quarter-mile study area, summarizing changes in the character of the neighborhood that can be expected in the future No-Action condition, and evaluating the ~~proposed project's~~Proposed Project's potential to affect the defining features of the neighborhood. If it is determined that the potential exists for the project to affect such features, a detailed assessment would be conducted. This assessment would involve gathering information through field visits, photographs, and other methods and predicting how the project would affect the key elements that define the study area's character.

Task 19: Construction

Construction impacts, though temporary, can have a disruptive and noticeable effect on the adjacent community, as well as people passing through the area. The EIS will present the overall construction duration for the proposed development to determine the peak period for each phase of construction and provide information on the entities with governmental oversight for various aspects of construction. Information on how New York City regulates construction hours will be included in this chapter. Due to the size of the development, the introduction of multiple buildings, the length of the construction period (i.e., over two years), and the proximity to residential uses, a detailed construction analysis will be required. Quantitative assessments will be prepared for transportation, air quality, and noise, as described below. Consistent with CEQR, the analysis will also assess the potential for construction-related activities to affect land use, neighborhood character, open space, historic and cultural resources, and hazardous materials.

Transportation

The volume of traffic that would be generated during the peak quarter of construction activities will be calculated, accounting for both construction worker trips made by automobile and the volume of delivery trucks during the construction peak period, as well operational trips from project components completed during the construction periods. Construction worker modal share will be based on census information. If no significant adverse traffic impacts are identified in the operational analysis, construction peak lane geometry, signal timing, and parking regulations are consistent with those of the operational peak hours, and capacity of the roadway network related to construction activities (such as roadway closures, lane closures or narrowing, parking prohibitions, etc.~~)~~,) are not expected to cause a deterioration in local or regional traffic flow, a determination will then be made as to whether the combination of background volumes plus construction-related trips during construction peak hours would be lower than projected peak-hour traffic volumes during project operation. If so, no potential impacts would be expected during the construction period, and no construction mitigation would be needed beyond what would be required for the With-Action condition. However, if significant adverse traffic impacts are identified in the operational analysis, or construction peak hour volumes are higher than peak hour volumes during project operation, a quantitative evaluation of selected intersections may be required (six intersections are assumed) consistent with the methods discussed under Task 12, Transportation.

Consistent with CEQR requirements, the analysis will include an estimate of the number of construction workers expected to drive to the site, the number of parking spaces needed, and whether there will be sufficient parking on-site (including existing and proposed parking) to accommodate this demand. If it is determined that off-site parking would be needed, a parking inventory of both on-street and off-street parking resources within the vicinity of the ~~project site~~Development Site will be performed and an assessment of capacity presented. This assessment will also evaluate the potential effect of construction activities, such as lane and sidewalk closures.

Air Quality

Emission Intensity Analysis

The project construction schedule will be evaluated to identify the peak period for air emissions, and the project's potential to result in significant adverse air quality impacts during construction will be assessed. The construction air quality section will evaluate on-site and ~~(if detailed transportation analysis is required for the construction period)~~ off-site ~~mobile air source~~ emissions from construction equipment~~, worker vehicles~~, delivery trucks, and fugitive dust emissions. A comparison will be made of the construction phase $PM_{2.5}$ emissions by ~~quarter~~month, analyzed for the cluster of buildings constructed during each construction phase of the project (i.e., emission intensity evaluation). A detailed dispersion analysis of construction sources, as described below, ~~may~~will be undertaken following the methodology identified in Chapter 17, Section 321 of the *CEQR Technical Manual* ~~if it is determined to be warranted through~~ based on the consultation with the lead agency ~~on~~and following the emission intensity assessment.

Detailed Dispersion Analysis

~~Should a~~A quantitative dispersion analysis ~~be required,~~will estimate air quality concentrations (CO, PM, and NO_2) due to construction activities at the ~~project site would be predicted~~Development Site for each analysis receptor for the peak month and peak year of the representative worst-case construction phase determined through emission intensity analysis. Air pollutant sources include combustion exhaust associated with non-road construction engines (e.g., cranes, excavators~~),~~, etc.), trucks operating on-site, construction-generated traffic on local roadways, and onsite activities that generate fugitive dust (e.g., excavation, demolition). The potential for significant impacts will be determined by comparing predicted total concentrations to the NAAQS or applicable CEQR guidance thresholds. Based on the results, possible mitigation strategies, including construction best management practices (BMPs) and best available technologies (BATs) for emission control will be evaluated and described to reduce air pollutant emissions associated with the project's construction activities.

Noise

Qualitative Assessment

Based on the project's construction scenario and phasing, the type of equipment and construction methods to be used, the number of construction vehicle trips and the proximity of noise and vibration-sensitive receptors, a qualitative assessment of the potential for elevated noise levels during each phase of construction will be developed, along with noise and vibration mitigation measures that are typically implemented to reduce emissions and the potential for adverse effects. ~~If warranted by the qualitative analysis, a quantitative assessment will be performed.~~ As described in Section 310 of the *CEQR Technical Manual,* ~~the determination whether it is sufficient to conduct a qualitative analysis or whether~~ a quantitative analysis is required ~~cannot be made~~ based ~~solely~~ on the duration of the construction period, and ~~should take into account such~~ factors as the location of the ~~project site~~Development Site in relation to existing residential uses or other sensitive receptors, the intensity of the construction activity, and the extent to which the project incorporates commitments to appropriate noise control measures.

Quantitative Assessment

~~Should a~~A quantitative construction noise and vibration assessment ~~be required, estimates~~ will be ~~made of~~conducted to estimate construction noise from on-site stationary construction equipment and construction-related vehicles, including worker trips and material handling trips on adjacent roadways. ~~Ambient sound monitoring would be conducted during the early morning period (6-7 AM) when there is the greatest potential for increases in noise due to mobile construction sources. If necessary, the~~The Cadna-A model will be used to calculate the existing noise ~~level~~levels at receptors during the early morning period (6-7 AM) to assess mobile construction sources**.**

Stationary and mobile construction noise levels ~~would~~will be predicted at nearby sensitive receptors and at the ~~project site~~Development Site itself, including existing buildings that will continue to operate during construction and new noise-sensitive uses that would be introduced during construction. Cadna-A sound prediction software, which accounts for the

type of equipment used, the usage factors, and distances from source to receptor and acoustic shielding from intervening buildings, ~~would~~will be used for the analysis. Construction noise from stationary sources would be evaluated according to requirements outlined in the New York City Noise Control Code. Construction noise mitigation recommendations would be developed, as needed, in accordance with CEQR and New York City Noise Control Code requirements.

~~Construction vibration has the potential to result in damage to adjacent structures, cause annoyance to people in nearby buildings, and/or affect vibration-sensitive equipment and operations in hospital buildings. If required, a construction vibration assessment would be conducted based on typical construction equipment that can generate vibration (i.e. pile driving, demolition, jack hammers, etc.) and prediction methods outlined in the Federal Transit Administration guidance manual. A construction vibration analysis is usually warranted if construction activities are expected to generate significant vibration within 90 feet of buildings.~~

Task 20: Mitigation

Where significant adverse project impacts have been identified, measures to mitigate those impacts will be described where feasible. These measures will be developed and coordinated with the responsible City/State agencies as necessary. In the event that one or more significant adverse impacts cannot be mitigated, the reason that mitigation is not practicable will be discussed and these impacts will be described as unavoidable adverse impacts.

Task 21: Alternatives

SEQRA requires that alternatives to the ~~proposed project~~Proposed Project be identified and evaluated in an EIS so that the decision-maker may consider whether alternatives exist that would minimize or avoid adverse environmental effects while achieving the goals and objectives of the ~~proposed project.~~Proposed Project. The selection of alternatives to a proposed project is determined by taking into account the nature of the specific project, its stated purpose and need, potential impacts, and the feasibility of potential alternatives. Consistent with SEQRA, a No Action Alternative will be considered. In addition, if any significant adverse impacts are identified, a No Unmitigated Significant Adverse Impact Alternative will be considered, which includes an assessment of the project that would result in no unmitigated impacts. Additional alternatives to the ~~proposed action~~Proposed Actions will also be considered once the full extent of the proposed action's impacts has been identified. The alternatives analysis will be qualitative, except where significant adverse impacts of the ~~proposed action~~Proposed Actions have been identified.

Task 22: EIS Summary Chapters

In accordance with CEQR guidelines, the EIS will include the following summary chapters, where appropriate to the Proposed ~~Action~~Actions:

- **Executive Summary**: The executive summary will use relevant material from the body of the EIS to describe the ~~proposed action~~Proposed Actions, its environmental impacts, measures to mitigate those impacts, and alternatives to the ~~proposed action~~Proposed Actions. As described in the *CEQR Technical Manual,* it will contain:

- A brief project description;
- A summary and list of each action;
- A summary of the significant adverse impacts, if any;
- A summary of the mitigation measures, if any, to reduce or eliminate any significant adverse impacts;
- Any important trade-offs identified in the other summary chapters;
- A summary of the unavoidable adverse impacts, if any;
- A short discussion of alternatives;
- The analysis areas examined in the EIS; and
- The analysis areas eliminated in the EIS for further study, and the reasons why.

› **Unavoidable Adverse Impacts**: This chapter will summarize any significant adverse impacts that are unavoidable if the ~~proposed action is~~Proposed Actions are implemented regardless of the mitigation employed (or if mitigation is not feasible).

› **Growth-Inducing Aspects of the Proposed ~~Action~~Actions**: This chapter will summarize the "secondary" impacts of a proposed action that trigger further development.

› **Irreversible and Irretrievable Commitments of Resources:** This chapter will summarize the ~~proposed actions~~Proposed Actions and its impacts in terms of the loss of environmental resources (use of fossil fuels and materials for construction, etc.), both in the immediate future and in the long term.

Appendix A: Written Comments on the Draft Scope of Work

March 13, 2020
Olga Abinader, Director
Department of City Planning, City of New York
Environmental Assessment and Review Division
120 Broadway, 31st Floor,
New York, New York 10271

Re: Proposed Draft Scope of Work for Innovative Urban Village

Director Abinader:

I am writing to submit comments in response to the proposed Draft Scope of Work for an Environmental Impact Statement (EIS) for the Innovative Urban Village project.

I have had several meetings with the developers of the proposal to develop the property currently owned by Christian Cultural Center (CCC). As I have said to the development team at the several meetings that we have had, I have several concerns regarding this project which prevent me from supporting the project in its present form. Two of my concerns are noted below.

First, the AMI proposed for this project does not reflect the percentages of the existing community. The East New York community has a neighborhood AMI of $36,000. The neighboring Brownsville community is similarly low, at about $34,000. To plan to bring in housing at the upper ranges of 100% AMI which is $97,000 for a family of three, means that the project would seek to bring in a significant portion of renters which far exceeds the percentage of residents who would presently qualify. This would lead to significant influx of a population that will lead to reduction in the residents who for so long have endured hardships and deprivations and who now would not have proportional opportunity to be included in the project.

Second, the density of the project far exceeds the context of the surrounding housing. The adjoining Starrett City/Spring Creek Complex and the neighboring Breukelen Houses offer open space that far exceeds the square foot lot/unit. At Starrett City, 7,652 units are cited on 6,088,567 square feet, compared to CCC proposed 2,100 on 449,164 square feet. At Starrett City the square foot lot/unit is 796 as compared to the proposed Urban Village measurement of 238. The FAR at Starrett City is 1.54 as compared to 4.2 – 5.02 at the Urban Village. The density of the proposed development is 3.5 times more dense than Starrett City. This density is reflected in the close proximity of the buildings to each other and the height of the proposed buildings.

We must expand the study area to ensure that we are fully aware of potential impacts to this community and we must also ensure that appropriate mitigation measures are in place for the affordability and infrastructure capacity challenges that may be triggered by this proposal.

I have addressed these concerns to the development team and we still have much to resolve in the days, weeks and months ahead.

Please feel free to contact my office if you have any questions. Thank you for your consideration.

Inez Barron
New York City Council Member
42nd Council District, Brooklyn

cc.: Brooklyn Community Board 5
Winston Von Engel, Brooklyn Office Director, Department of City Planning

1. ***Proposed Zoning Map and Text Amendments***

The proposed zoning map and text amendments would create a significant increase in residential density. According to the scoping documents, the policy rationale is to facilitate the residential density needed to provide a substantial amount of affordable housing, and to provide amenities that cannot be met under the existing zoning.

The proposal also calls for maxing out the available FAR with MIH (4.6). There is limited precedent of mapping an R7 district so far from transit, the surrounding context is R5, which includes the Starrett City development, which is the same height but much less dense due to the open space.

Considerations need to be made for the rationale for reducing the parking requirements via the Zoning Map Amendment from R5 to R7-2/C2-4, as well as the proposed text amendments that would expand the existing boundaries of the Transit Zone to include the development site. Given that the developer has identified a proposed shuttle as a need to connect residents and visitors to nearby stations, the argument that this area should be included in the Transit Zone seems inappropriate.

2. ***Proposed Special Permits***

The proposed Special Permits, in conjunction with the text amendment to include the site in the Transit Zone, again raise the concern for the reduction in parking; as this is an area without easy access to the public transportation lines. It would be critical to consider the need for parking for new residents, particularly those low-income residents who rely on their cars to get to work every day.

3. ***Impacts on Land Use, Zoning, and Public Policy***

The proposed primary study area is a ¼ mile radius from the perimeter of the development site. This does not accurately reflect the context of the surrounding area, including the future full buildout of the planned Vital Brooklyn Development at 888 Fountain Ave or the Gateway affordable housing development, both within a 2 mile radius of the study area. Any potential impacts should be analyzed with an expanded study area.

4. ***Impacts on Socioeconomic Conditions***

The proposed primary study area is a ¼ mile radius from the perimeter of the development site. This does not accurately reflect the context of the surrounding area, and the study area should be expanded to reflect a more accurate condition of the surrounding neighborhoods and any direct or indirect residential or business displacement that may occur as a result of the proposed development.

5. Impacts on Community Facilities, and Services

As stated in the Draft Scope of Work, the project will have impacts on the number school seats in the area. A school siting application should advance concurrently with the zoning actions to mitigate impacts in this school district.

The analysis of significant adverse impacts to valuable library services for this community should take into account the upcoming closure of New Lots library for renovation scheduled for 2021. Feasible mitigation measures should be identified if there are significant adverse impacts to library services.

6. ***Impacts on Transportation***

While the Draft Scope of Work proposes to identify impacts on the identified subway stations (the East 105th Street L station and the Pennsylvania Avenue 3 station), impacts should also be studied on the nearby Livonia Avenue L station and Junius Street 3 station. Because ADA accessibility and a new transfer connection between these stations is planned, there is an increased likelihood that these stations will serve residents in the planned development.

In addition to my above comments regarding parking requirements, potential mitigations should focus on prioritizing uses that would promote car sharing, and creating opportunities for retail that would reduce car trips (such as supermarkets or a pharmacy within walking distance from residential).

7. ***Impacts on Infrastructure, Natural Resources, Water and Sewers***

The EIS should be sure to include any potential impacts to the nearby Fresh Creek Nature Preserve and describe any special considerations when proposing such a large development so close to this natural resource.

In addition, as noted in the EAS, a portion of the development site is in the New York State Department of Environmental Conservation's Brownfield Remediation Cleanup Program. Any future consideration of this proposed development will have to include discussions on the cost of this environmental remediation and how that affects the viability of the project.

The EIS should also note the impacts on both the frequency and the volume of Combined Sewer Overflow events.

Comment from Rebecca Caraballo, President, Starrett City Tenant Association

Ladies and Gentlemen,

I am writing in support of the new and exciting project proposed by Reverend A. R. Bernard,

on his property between Louisiana, Flatlands, and Pennsylvania Avenues. The proposal is for an affordable community, consisting of affordable and regular housing, schools, community center, local stores, restaurants and numerous other necessities and amenities.

This East New York community has been under redevelopment for some years now and this would create, for the residents of this community more opportunities and options.

I support those who see a need and are willing to help improve the quality of life of a community, as long as the original and long time residents of that community are the first ones benefitting from these additions, changes and improvements.

I believe this would be good for the entire community

I remain,

Respectfully,

Rebecca Caraballo

president

SCTA, and 40 year resident of this community

Comment from Reverend Lozada, 75th Precinct Clergy Council

To the Department of City Planning and my fellow members of our East New York Community,

My name is Reverend Hector Lozada. Based on what I learned about the Christian Cultural Center's Innovative Urban Village project through my engagement with the Christian Cultural Center and its partners, I support this project for the following reasons.

The Christian Cultural Center is planning to incorporate numerous social services and amenities for youth into its project. These include a school facility, a playground, and a 24-hour/day child care facility. Also, this project is set to have features that can be enjoyed by community members of every age, such as public green space and a performing arts center. Additionally, the Christian Cultural Center is planning on creating opportunities for local businesses and community members to thrive economically. These opportunities include new ground floor storefronts for small businesses to move into, which will bring retail jobs to this area, as well as career counseling and vocational training services.

The Christian Cultural Center's project will serve the residential needs of our community by building over 2,100 units of rent-stabilized affordable housing. 267 of these units will be reserved for seniors and supportive services will be offered to the seniors who move into these new homes. The seniors who move into this new village, along with others in East New York, will have the opportunity to use an on-location senior center. The Christian Cultural Center also plans to construct 200 residences that can be purchased at prices that are targeted towards households in East New York.

This project will bring many exciting opportunities to East New York, which will be offered to all community members, regardless of whether they are residents of this new village or not.

I look forward to further meetings with the Christian Cultural Center and their partners so that I can hear updates about any progress that is made.

Sincerely,

Reverend Hector Lozada

Local Development Corporation of East New York

Address: Local Development Corporation of East New York
80 Jamaica Avenue, 3rd Floor
Brooklyn, NY 11207
Website: ldceny.org
Social Media: Twitter: @bklynwbc
Facebook: WBECBrooklyn
Telephone: 718-385- 6700 Fax: 718-385-7505

March 3, 2020

Dear Department of City Planning,

My name is Bill Wilkins and I am writing to you in support of the Christian Cultural Center's Innovative Village project.

I have discussed the Christian Cultural Center's project with their representatives, and believe that their project will be beneficial for the East New York Community. First and foremost, the Christian Cultural Center's project will create housing and economic opportunities for East New York. These opportunities include a livable campus and spaces for local community members to open stores, which will be beneficial for multiple reasons. For example, this model will assist in recycling dollars locally. Secondly, this project will create opportunities for those who live and work in East New York to try out their hand as entrepreneurs, or to expand their existing commercial operations with another satellite store.

Furthermore, the foot traffic that this "village" would bring will ensure that these businesses have access to customers. Secondly, these new businesses will surely bring additional jobs into the community. The Christian Cultural Center plans to incorporate several services that will benefit the residents of East New York into their project. These include Services such as GED programs, childcare programs, career counseling, vocational training, and amenities such as a performing arts center, a school, a public playground, green space, and parking are amongst the public benefits that the Christian Cultural Center plans to include in their project. Additionally, I am pleased with their providing much needed parking and transportation to local train stations.

Finally, this project is slated to create 2100 units of housing, 100% of which will be affordable based on household incomes. Many of these units will be reserved for households with lower incomes, which reflects the needs of the East New York community. 200 of these affordable housing units will be reserved for seniors.

I look forward to future engagement with the Christian Cultural Center on this project.

Respectfully,

William S. Wilkins

Appendix B: Response to Comments on the Draft Scope of Work

1

Introduction

This document summarizes and responds to comments on the Draft Scope of Work (DSOW) for the Innovative Urban Living, published on January 31, 2020.

City Environmental Quality Review (CEQR) requires a public scoping meeting as part of the environmental review process. Oral and written comments were received during the public hearing held by the New York City Department of City Planning on March 3, 2020. Written comments were accepted from issuance of the DSOW through the close of the public comment period, which ended at 5:00 PM on March 13, 2020. **Appendix A** contains the written comments received on the DSOW.

Section 2 lists the elected officials, organizations, and individuals that provided relevant comments on the DSOW. **Section 3** contains a summary of these relevant comments and a response to each. These summaries convey the substance of the comments made, but do not necessarily quote the comments verbatim. Comments are organized by subject matter and generally parallel the chapter structure of the DSOW. Where more than one commenter expressed similar views, those comments have been grouped and addressed together.

2

List of Elected Officials, Organizations, and Individuals who Commented on the Draft Scope of Work (DSOW)

Elected Officials

1. Inez Barron, then City Council member, NYC Council District 42, written statement dated March 13, 2020 (Barron)

Organizations and Interested Public

2. Richard Bearak, Land Use Director, Brooklyn Borough President Office, spoken testimony dated March 3, 2020 (Bearak)
3. Charles Bullock, member of Carpenter's Union; member of Community Board 5; and chairman of the Youth Committee and Education Committee, spoken testimony dated March 3, 2020 (Bullock)
4. Rebecca Caraballo, President of Starrett City Tenant Association, Inc., written statement dated March 13, 2020 (Caraballo)
5. James Chestnut, member of the public, spoken testimony dated March 3, 2020 (Chestnut)
6. Danny Guzman, member of Local 79, spoken testimony dated March 3, 2020 (Guzman)
7. Hector Lozada, Reverend and Vice-President of 75th Precinct Clergy Council, spoken testimony dated March 3, 2020 and written statement dated March 4, 2020 (Lozada)
8. Bryce Moreno, member of 32BJ, spoken testimony dated March 3, 2020 (Moreno)
9. Michael Negron, member of Local 79, spoken testimony dated March 3, 2020 (Negron)
10. Isaiah Thomas, member of the public, spoken testimony dated March 3, 2020 (Thomas)
11. William (Bill) S. Wilkins, Director of Economic Development of Local Development Corporation of East New York, spoken testimony and written statement dated March 3, 2020 (Wilkins)

3

Comments and Responses on the DSOW

General Comments/Comments in Support of the Proposed Project

C.1 **I am the Land Use Director for Brooklyn Borough President Eric Adams. We're just here to say that we will be listening. We are very interested in what the public has to say. We are interested in listening to your remarks. The Borough President intends to submit comments by the written deadline. After the Environmental application is complete and City Planning is able to bring the item forward for certification, as part of the ULURP process, Borough President Adams will follow the community board in terms of holding a public hearing. We welcome the public again to participate as part of that public process. (Bearak)**

Response: Comment noted.

C.2 **I am writing in support of the project proposed by Reverend A. R. Bernard. The proposal is for an affordable community, consisting of affordable and regular housing local stores, and restaurants. The Christian Cultural Center is planning to incorporate numerous social services and amenities for youth into its project. These include a school facility, a playground, and a 24-hour/day childcare facility. Also, this project would have features that can be enjoyed by community members of every age, such as public green space, a performing arts center (PAC) and services such as GED programs, career counseling, vocational training, and parking. This project would create 2,100 units of housing, 100 percent of which would be affordable based on household incomes. Many of these units would be reserved for households with lower incomes, which reflects the needs of the East New York community. 267 of these units would be reserved for seniors and supportive services would be offered to the seniors who move into these new homes. The seniors who move into this new village, along with others**

in East New York, would have the opportunity to use an on-location senior center. The Christian Cultural Center also plans to construct 200 residences that can be purchased at prices that are targeted towards households in East New York. I would, without hesitation or reservation, support the development of this project. (Caraballo; Lozada; Thomas; Wilkins)

Response: Comment noted. It is also noted that 200 units would be designated as senior or supportive housing units as opposed to the 267 units cited.

C.3 **I am a lifelong resident of East New York, Brooklyn. I used to work for a non-union company doing labor work for low pay and no benefits. My life changed and was vastly improved when I joined the Laborers Local 79. I would like to see other East New York residents, like me, being given this pathway to middle class and a better life. East New York needs good wages and careers not just dead-end construction jobs. (Guzman; Negron)**

Response: Comment noted.

Analytical Framework

C.4 **We must expand the study area to ensure that we are fully aware of potential impacts to this community and we must also ensure that appropriate mitigation measures are in place for the affordability and infrastructure capacity challenges that may be triggered by this proposal. (Barron)**

Response: As discussed in the Final Scope of Work (FSOW) and in consultation with the Department of City Planning, the study areas determined for the DEIS range from a quarter mile to a mile and a half radius from Project Area for each of the technical areas, consistent with *2021 CEQR Technical Manual* guidance. It is noted that for the Land Use, Zoning, and Public Policy technical area, a study area of a quarter-mile radius from the Project Area will be used. The use of a quarter-mile radius ensures that the DEIS adequately accounts for and evaluates nearby land use patterns and trends. In addition, while the *CEQR Technical Manual* guidance dictates the study area, where relevant, certain technical areas such as Socioeconomic Conditions provide further qualitative analysis beyond the study area to allow for additional context and understanding of the potential project impacts. As discussed in the FSOW, where significant adverse project impacts have been identified, measures to mitigate those impacts will be described in the DEIS.

Comments on Specific EIS Impact Categories

Land Use, Zoning, and Public Policy

C.5 **The density of the project far exceeds the context of the surrounding housing. The adjoining Starrett City/Spring Creek Complex and the neighboring Breukelen Houses offer open space that far exceeds the square foot lot/unit. At Starrett City, 7,652 units are cited on 6,088,567 square feet, compared to CCC proposed 2,100 on 449,164 square feet. At Starrett City the square foot lot/unit is 796 as compared to the proposed urban village measurement of 238. The FAR at Starrett City is 1.54 as compared to 4.2 – 5.02 at the urban village. The density of the proposed development is 3.5 times more dense than Starrett City. This density is reflected in the close proximity of the buildings to each other and the height of the proposed buildings. (Barron)**

Response: The Proposed Actions include the following: a zoning map amendment to change the existing zoning from an R5 to R7-2 with a C2-4 overlay; a zoning text amendment to Appendix F of the Zoning Resolution (ZR) to designate the Project Area as a Mandatory Inclusionary Housing (MIH) area, Option 1; a zoning text amendment to Appendix I of the Zoning Resolution to expand the boundary of the Transit Zone to include the Development Site; a special permit pursuant to ZR 74-743(a)(2) to locate buildings within a large-scale general development at the Development Site without regard to yard, distance between buildings, and height and setback regulations; and a special permit pursuant to ZR 74-512 to permit a public parking garage at the Development Site with 500 spaces, including 45 spaces located on the roof of the public parking garage.

As noted in the comment, approval of the proposed zoning map amendment would allow the Project Area to be developed with greater bulk and density than is allowed by current zoning.

In response to comments received on the DSOW and in consultation with the Department of City Planning, the lead agency on the project, certain programmatic and design modifications were made to the Proposed Project since the publication of the DSOW. Specifically, modifications were made to reallocate floor area across the Project Area to allow for lower building heights overall, with a maximum building height of 15 stories compared with the previously proposed 17 stories, and a lower FAR of 4.29 (3.86 FAR without parking) compared with 4.65 FAR previously proposed. Additionally, the program was modified to eliminate the school as the project is not expected to result in new demand such that the School Construction Authority (SCA) would determine that additional school capacity is warranted.

Further, given the decrease in overall FAR for the project as compared to the initial proposal, the Applicant intends to reduce the number of proposed affordable residential units. As compared to the program identified in the DSOW, the number of residential units would decrease from 2,118 to 2,050 units. The Applicant also intends to increase the overall affordability of the units with the elimination of the previously proposed middle-income units (100 to 120 percent of Area Median Income (AMI)), committing the entirety of the project to providing very low-, low-, and moderate-income housing units. The FSOW has been updated to reflect these programmatic and design modifications.

An assessment of the Proposed Project's consistency with the surrounding land uses and zoning districts is provided in the DEIS chapter on Land Use, Zoning, and Public Policy. As discussed in that chapter, unlike the adjoining Starrett City/Spring Creek complex, the Proposed Project would not be a "tower in the park" development. The Applicant believes the site planning exhibited by the Proposed Project better reflects design considerations to provide a walkable community, providing housing with immediate access to support services, local retail, and activity spaces. In addition, the level of density proposed allows the project to maximize the number of deep affordable housing units provided on-site and helps facilitate the proposed open space, PAC, parking garage, and other programmatic assets that could otherwise not be supported with a smaller project. In addition, the DEIS chapter on Socioeconomic Conditions provides an analysis of the potential for the Proposed Project to result in indirect residential displacement.

C.6 There is limited precedent of mapping an R7 district so far from transit, the surrounding context is R5, which includes the Starrett City development, which is the same height but much less dense due to the open space.

Considerations need to be made for the rationale for reducing the parking requirements via the Zoning Map Amendment from R5 to R7-2/C2-4, as well as the proposed text amendments that would expand the existing boundaries of the Transit Zone to include the Development Site. Given that the developer has identified a

proposed shuttle as a need to connect residents and visitors to nearby stations, the argument that this area should be included in the Transit Zone seems inappropriate.

The proposed Special Permits, in conjunction with the text amendment to include the site in the Transit Zone, again raise the concern for the reduction in parking; as this is an area without easy access to the public transportation lines. It would be critical to consider the need for parking for new residents, particularly those low-income residents who rely on their cars to get to work every day. (Barron)

Response: A zoning map amendment is proposed to change the existing R5 district to an R7-2 district with a C2-4 commercial overlay in the Zoning Amendment Area. The existing R5 zoning does not allow for commercial uses, limiting possibilities for local retail and economic opportunity for small business owners. The C2-4 commercial overlay would address this need by allowing for a range of commercial uses at the Development Site, including a grocery store and local retail to serve residents of the Proposed Development and the surrounding neighborhoods.

In addition, the R5 zoning does not allow for sufficient density to create the integrated residential, local retail, and community facility development at the proposed affordable income levels envisioned for the Development Site. The rezoning from an R5 district to an R7-2 district would allow for an increase in the development potential in the Development Site from 1.25 FAR for residential to 4.6 FAR in an MIH district, and from 2.0 for community facility use to 6.5 FAR. This would allow for a sufficient number of dwelling units and tenants to provide a nearby customer base for the local retail uses envisioned for the Proposed Development, supporting the economic viability of this important component of the Proposed Development while also allowing sufficient density to accommodate the strong community facility core central to the Proposed Development. The increase in density would also facilitate the broad range of affordable units envisioned for the Proposed Development, with the higher AMI units helping to subsidize the low and very low-income units. The Proposed Development contemplates an FAR of 4.29 including the public parking garage, and floor area allowed by the R7-2 zoning aligns with the Proposed Development in a manner appropriate to the area. The rezoning area is immediately adjacent to two wide streets, including one providing direct access to the Shore Parkway, and has good access to mass transit and is an appropriate area for the additional density being proposed, and without resulting in additional development potential that would occur with a higher density zone, such as an R8 district.

The proposed Zoning Map Amendment would also modify height and setback and yards controls in the rezoning area to establish a dynamic street wall presence within the Project Area in buildings with heights reflective of other residential buildings in the surrounding area. In particular, under Quality Housing and MIH controls and in absence of the additional land use actions being proposed, the proposed R7-2 zoning would require that (i) buildings be located at the street rather than separated from the streets by a front yard, (ii) buildings have a minimum base height of 40 feet and a maximum height of 75 feet before setback rather than a maximum street wall height of 30 feet; and (iii) a maximum building height of 135 feet and 13 stories where affordable is provided on site, instead of a maximum height of 40 feet. While the other land use actions seek some adjustment to these street wall controls to make the building configuration even more dynamic, the general bulk controls for R7-2 districts are appropriate for the area by bringing uses and building heights already in the area out to the street line, lending to their accessibility, providing more activity and eyes on the streets, and promoting a more pedestrian-friendly environment.

As described in the Purpose and Need discussion of Chapter 1, Project Description in the DEIS, the Applicant also requests a zoning text amendment to Appendix I of the Zoning Resolution (Transit Zone) to expand the boundary of the Transit Zone to include the Development Site. The site is also directly across Flatlands Avenue from the Transit Zone boundary to the north, and has a range of transit options nearby, including the Subway (the

East 105th Street and Canarsie-Rockaway Parkway stops on the L and the Pennsylvania Avenue stop on the 3, all located within a mile of the Project Area) and the BM2 Express, BM5 Express, B6, B6 limited, B60, B82, B82 Select Bus Service (SBS), B83, and B103 limited bus lines, providing local and express service throughout Brooklyn, Manhattan, and Queens including to the local subway stations. In addition to the mass transit service, and it is anticipated that the Proposed Development would provide shuttle bus service to and from the East 105th Street and Pennsylvania Avenue stations. For this reason, it is anticipated that most residents would use public transit as the primary transportation method (currently, approximately 62 percent of the residents, based on census data, commute to work via mass transit). The change in the Transit Zone boundary would reflect this fact and would promote more sustainable forms of transportation.

As described in Chapter 1, Project Description of the DEIS, car ownership in the Surrounding Area is approximately 0.3 cars per household, based on census tract data for the Project Area (census tract 1058.04) and Starrett City (tract 1058.01). Across the Brooklyn transit zone, there is an average of 0.47 vehicles per household - well above the car ownership statistics in the vicinity of the Development Site - and the overall average vehicle ownership rate for the entire borough of Brooklyn is 0.57 vehicles per household. The Proposed Development is intended to include a shared car and electric vehicle program (Zipcar or a similar car-sharing system), which together are intended to both reduce the need for car ownership and increase sustainability.

The proposed change in boundaries would reflect the mass transit options already serving the Development Site and car ownership data in the area, would promote more sustainable forms of transportation. Additionally, the Applicant has indicated that the reduced parking requirements of the Transit Zone would allow them to avoid the unnecessary costs of building parking in excess of anticipated demand by residents in an affordable housing project.

Overall, the Proposed Project would provide a total of approximately 886 parking spaces within subgrade parking (approximately 386 accessory parking spaces) as well as an approximately 7-story, 500-space public parking garage. In addition, the local-serving retail space is intended to facilitate walkability and reduce necessary vehicle trips, and a shuttle would be provided as a further convenience to residents.

As assessment of the Proposed Project's consistency with the surrounding land uses and zoning districts is provided in the Land Use, Zoning, and Public Policy chapter of the DEIS. In addition, as detailed in the FSOW, a parking analysis is provided in the Transportation chapter of the DEIS. The analysis documents the anticipated parking demand to be generated by the Proposed Project and assesses whether parking to be provided as part of the project would be sufficient to accommodate the demand. If the parking demand analysis shows that parking provided on-site would not be sufficient to accommodate the project's demand, then a detailed parking analysis would be performed.

Socioeconomic Conditions

C.7 The AMI proposed for this project does not reflect the percentages of the existing community. The East New York community has a neighborhood AMI of $36,000. The neighboring Brownsville community is similarly low, at about $34,000. To plan to bring in housing at the upper ranges of 100 percent AMI which is $97,000 for a family of three, means that the project would seek to bring in a significant portion of renters which far exceeds the percentage of residents who would presently qualify. This would lead to significant influx of a population that will lead to reduction in the residents who for so long have endured hardships and deprivations and who now would not have proportional opportunity to be included in the project. (Barron)

Response: The DEIS includes a detailed analysis of indirect residential displacement, which assesses whether the Proposed Actions may introduce a trend of changing socioeconomic conditions that has the potential to displace vulnerable populations. The detailed socioeconomic conditions analysis examines current median income in a half-mile study area in comparison to the community board and borough, as well as the projected income of new residents in the Proposed Project.

In addition, in response to comments received on the DSOW and in consultation with the Department of City Planning, certain programmatic and design modifications were made to the Proposed Project since the publication of the DSOW. Specifically, modifications were made to reallocate floor area across the Project Area to allow for lower building heights overall, with a maximum building height of 15 stories compared with the previously proposed 17 stories, and a lower FAR of 4.29 (3.86 FAR without parking) compared with 4.65 FAR previously proposed. Additionally, the program was modified to eliminate the school as the project is not expected to result in new demand such that the SCA would determine that additional school capacity is warranted.

Given the decrease in overall FAR for the project as compared to the initial proposal, the Applicant intends to reduce the number of proposed affordable residential units. As compared to the program identified in the DSOW, the number of residential units would decrease from 2,118 to 2,050 units. The Applicant also intends to increase the overall affordability of the units with the elimination of the previously proposed middle-income units (100 to 120 percent of AMI), committing the entirety of the project to providing very low-, low-, and moderate-income housing units. Specifically, the Proposed Project would include 50 percent of units at 60 percent of AMI or less, 25 percent of units at 80 percent of AMI or less, and 25 percent of units at 100 percent of AMI or less. The FSOW has been updated to reflect this change.

C.8 The proposed primary study area is a quarter-mile radius from the perimeter of the Development Site. This does not accurately reflect the context of the surrounding area, and the study area should be expanded to reflect a more accurate condition of the surrounding neighborhoods and any direct or indirect residential or business displacement that may occur as a result of the proposed development. (Barron)

Response: Pursuant to *2021 CEQR Technical Manual* guidelines and in response to comments received on the DSOW, the detailed Socioeconomic Conditions analysis included in the DEIS examines conditions within a half-mile study area. Where applicable, the DEIS will also provide comparison data for the community board and borough. The FSOW has been updated to reflect this change.

C.9 I feel that we should offer pathways for people that live locally, to get into the unions, apprenticeship programs. This development is very important for the community. We should think about having good jobs that have benefits so people could actually afford to live in the area. The Christian Cultural Center is planning on creating opportunities for local businesses and community members to thrive economically. These opportunities include new ground floor storefronts for small businesses to move into, which will bring retail jobs to this area. Furthermore, the foot traffic that this "village" would bring will ensure that these businesses have access to customers. (Bullock; Lozada; Wilkins)

Response: Comment noted.

C.10 We estimate this re-zoning, which will allow the construction of more than 2,000 apartments, community and retail space, will lead to the creation of many new service jobs or new building service jobs. We hope the Environmental Review process will take the issue of job quality for building service workers seriously. We believe that the best

way to make sure that developments, like this one proposed, have a positive impact on building service workers, is for the developers to make a formal commitment to pay a prevailing wage. (Moreno)

Response: Comment noted. The Applicant has stated that they are committed to providing quality jobs as part of the Proposed Project and has indicated that they already signed an agreement with 32BJ to hire 32BJ building service workers, including workers from the local community. Per CEQR guidelines, the topic of job quality for building service workers is beyond the scope of the DEIS.

C.11 Why provide a new supermarket? We already have many supermarkets, including Food World, Food Bazaar, Cherry Valley, City Fresh, and Shoprite. So my concern is only about the supermarket. (Chestnut)

Response: The Proposed Project would introduce a total of approximately 79,970 gross square feet of retail space, including approximately 14,300 gross square feet of grocery store space to serve and support the future residents of the project. The Applicant believes there would be additional market demand for this use with the addition of residents to the Project Area. Furthermore, unlike the nearby supermarkets cited by the commenter that are geared towards vehicle trips, it is anticipated that the proposed grocery would provide pedestrian customers with local and fresh groceries, and therefore the proposed grocery store is not expected to compete with the existing neighborhood supermarkets. Pursuant to CEQR guidelines, commercial development of 200,000 square feet or less would not result in significant socioeconomic impacts, and therefore the Proposed Actions do not trigger the need for an analysis of indirect business displacement.

Community Facilities and Services

C.12 As stated in the Draft Scope of Work, the project will have impacts on the number school seats in the area. A school siting application should advance concurrently with the zoning actions to mitigate impacts in this school district.

The analysis of significant adverse impacts to valuable library services for this community should take into account the upcoming closure of New Lots library for renovation scheduled for 2021. Feasible mitigation measures should be identified if there are significant adverse impacts to library services. (Barron)

Response: In response to comments received on the Proposed Actions and in consultation with the lead agency on the project, the Department of City Planning, certain programmatic and design modifications were made to the Proposed Project since the publication of the DSOW, including the elimination of the previously proposed charter school. The FSOW has been updated to reflect this change. As detailed in the FSOW, an assessment of potential impacts to schools and libraries is undertaken in the DEIS. Where significant adverse project impacts are identified, measures to mitigate those impacts will also be identified. The Applicant will coordinate with the lead agency as well as the Brooklyn Public Library to ensure the proposed measures would mitigate any identified impacts. The Applicant will also coordinate with the lead agency to determine whether a school siting application would be needed. If feasible and practicable mitigations cannot be identified to fully mitigate an impact, the impact would be disclosed as unavoidable.

Natural Resources

C.13 The EIS should be sure to include any potential impacts to the nearby Fresh Creek Nature Preserve and describe any special considerations when proposing such a large development so close to this natural resource. (Barron)

Response: As detailed in the FSOW, an assessment of natural resources is included in the DEIS which addresses the potential for the Proposed Project to affect the nearby Fresh Creek Nature Preserve.

Hazardous Materials

C.14 A portion of the Development Site is in the New York State Department of Environmental Conservation's Brownfield Remediation Cleanup Program. Any future consideration of this proposed development will have to include discussions on the cost of this environmental remediation and how that affects the viability of the project. (Barron)

Response: As detailed in the FSOW, the Hazardous Materials chapter of the EIS summarizes the results of all investigations on the site including those associated with the NYSDEC Brownfield Cleanup Program and details any future cleanup efforts that would be pursued. The cost of the environmental remediation is beyond the scope of this DEIS. However, while not included in the CEQR scope, the Applicant believes that the site's participation in the Brownfield Cleanup Program only further supports the delivery of the project and provision of affordable housing.

Water and Sewer Infrastructure

C.15 The EIS should also note the impacts on both the frequency and the volume of Combined Sewer Overflow events. (Barron)

Response: As detailed in the FSOW, the Water and Sewer Infrastructure analysis of the DEIS determines existing and future wastewater flows from the site and evaluates the incremental effect of wastewater flows from the Proposed Project on the capacity of conveyance facilities and the Wastewater Treatment Plant. If the analysis determines that the Proposed Project's increased combined sewer flows and volumes have the potential to exacerbate Combined Sewer Overflow volumes or frequency, the analysis will include modeling of discharge volumes and frequencies for each combined sewer outfall in the affected catchment area. If significant adverse impacts are identified, potential mitigation strategies would be assessed to reduce or eliminate, to the greatest extent practicable, the effects caused by the Proposed Project.

Solid Waste and Sanitation Services

C.16 We believe any investigation of a project like this should consider whether the development will sustain waste standards in the building service industry and provide options for doing so. (Moreno)

Response: As discussed in the FSOW, the *CEQR Technical Manual* states that an assessment of solid waste and sanitation services is warranted if an action would have the potential to result in a substantial increase in solid waste production that could overburden available waste management capacity or otherwise be inconsistent with the City's Solid Waste Management Plan (SWMP) or with state policy related to the City's integrated solid waste management system. Per *2021 CEQR Technical Manual* guidelines, the DEIS analysis

identifies proposed locations and storage methods for residential and commercial refuse and recyclables, identifies the volume of refuse and recyclables (if any) that would occupy the sidewalk and for what time periods, and evaluates whether the incremental increase in solid waste would require additional garbage trucks or other sanitation services. The analysis also considers the project's consistency with the City's SWMP.

Transportation

C.17 While the Draft Scope of Work proposes to identify impacts on the identified subway stations (the East 105th Street L station and the Pennsylvania Avenue 3 station), impacts should also be studied on the nearby Livonia Avenue L station and Junius Street 3 station. Because ADA accessibility and a new transfer connection between these stations is planned, there is an increased likelihood that these stations will serve residents in the planned development.

Response: The Transit Analysis section under Task 13, Transportation in the FSOW describes the specific transit analyses that will be undertaken in the DEIS. Additionally, Chapter 13 of the DEIS described the proposed methodology for the subway analysis, including the rationale for inclusion of specific subway stations in the analysis.

The East 105th Street L station and Pennsylvania Avenue 3 station would be expected to be used by riders accessing the site due to their proximity to the site. Based on discussions with the lead agency following the publication of the DSOW, because there is existing connecting bus service, the Rockaway Parkway station (L subway line) will also be considered for assessment. The FSOW has been updated to reflect this change. A modest number of subway trips would be expected to transfer between the Livonia Avenue L station and Junius Street 3 station, but it is assumed that the majority of subway riders would prefer to limit the number of necessary transfers as they would need to make a bus-to-subway transfer prior to riding the subway. As the number of transfers are modest and subway trips are not expected to enter or exit the stations, these stations would not be expected to meet the CEQR thresholds for detailed analyses.

C.18 In addition to my above comments regarding parking requirements, potential mitigations should focus on prioritizing uses that would promote car sharing and creating opportunities for retail that would reduce car trips (such as supermarkets or a pharmacy within walking distance from residential). (Barron)

Response: Proposed components of the Proposed Development are intended to reduce the need for car ownership and increase sustainability and alleviate the effect of the lower parking requirements. In addition to connecting bus service on the project block, the Proposed Project would provide shuttle bus service for residents, who would be expected to primarily commute to work via mass transit, and visitors to the East 105th Street subway station and the Pennsylvania Avenue subway station, aiding in the reduction of car trips. The Proposed Development intends to also include a share car and electric vehicle program (Zipcar or a similar car-sharing system) which would reduce the demand for parking.

The Proposed Development would include neighborhood retail, grocery store, and other commercial uses would be located on the ground floor level. These uses would be expected to primarily serve the residents of the Proposed Project as well as residents from the nearby Starrett City complex. The trips to the proposed commercial uses are expected to be mostly walk trips due to the proximity of the site to the immediate catchment area.

Construction

C.19 When you think about construction, you think about safety. A lot of non-union job sites have safety issues. You see people dying on these job sites. (Bullock; Moreno)

Response: Comment Noted. The Applicant is fully committed to meeting and exceeding building code safety requirements. Task 19 in the DSOW describes the analyses that will be prepared for inclusion in the DEIS. Chapter 19 of the DEIS provides the analysis, including discussion of construction oversight, and describes the measures that will be taken to ensure safety of workers and the members of the public. As stated in the DEIS, governmental oversight of construction in New York City is extensive and involves a number of City, State, and Federal agencies, each with specific areas of responsibility regarding construction safety.

Appendix C: Travel Demand Analysis Technical Memorandum

Memorandum

To: New York City Department of City Planning – EARD
CC: Bryan Kelly, Simeon Maleh and Stephen Strateman – Gotham
David Quart, David Velez, and Abigail Rudow – VHB

Date: February 15, 2022

Project #: 26658.00

From: Alfred Yeung and Elizabeth Jule Gladoun– VHB

Re: Innovative Urban Village – Travel Demand Analysis Memorandum (Brooklyn, NY)

INTRODUCTION

This memorandum summarizes the travel demand assumptions and transportation screening analysis for the proposed Innovative Urban Village development project which would be located along Flatlands Avenue between Louisiana Avenue and Pennsylvania Avenue in the East New York section of Brooklyn (see Figure 1). It provides a detailed description of the project analysis framework and travel demand assumptions used to determine the number of trips generated by the proposed project. The project is expected to be completed in 2031.

ANALYTICAL FRAMEWORK

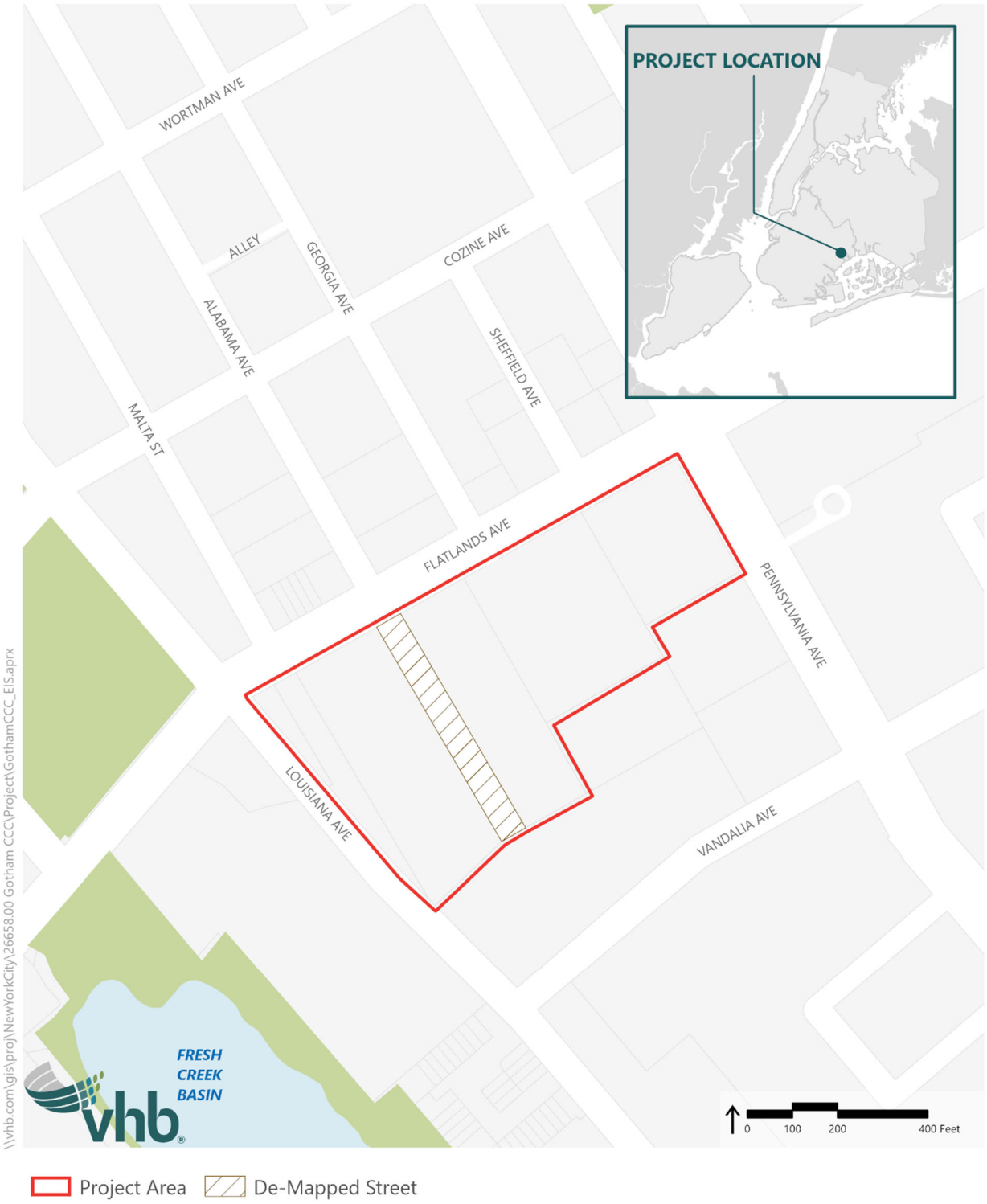
The proposed project would consist of 2,050 residential dwelling units (DUs), approximately 65,670 square feet (sf) of local retail space, approximately 14,300 sf of food store space, approximately 52,820 sf of community facility space, approximately 81,740 square feet (1.88 acres) of publicly accessible passive open space, and approximately 343,244 square feet of on-site above and below grade garage parking (approximately 886 parking spaces). The community facility space is assumed to consist of approximately 12,320 sf of daycare space, an approximately 16,500 sf performing arts center (up to 299 seats), an approximately 14,100 sf trade school which would be developed within the eastern wing of the existing Christian Cultural Center (CCC) building, and approximately 9,900 sf of other community facility space (assumed to be medical office). A portion of the existing 92,784 sf CCC building would be adapted to house the trade school resulting in approximately 78,684 sf of CCC church space and 14,100 sf of trade school. The church seating capacity is expected to remain the same as only existing limited use church ancillary spaces are planned to be adapted. Table 1 shows the uses of the proposed development.

Table 1: Development Increment for Analysis

Use	With-Action Condition Development Increment
Residential	2,050 DU
Local Retail	65,670 sf
Food Store	14,300 sf
Daycare	12,320 sf
Medical Office	9,900 sf
Performing Arts Center	16,500 SF (299 seats)
Trade School	14,100 sf
Publicly Accessible Passive Open Space	81,740 sf (1.88 acres)
CCC Accessory Parking	197,560 sf (approximately 500 parking spaces)
Residential Accessory Parking	145,684 sf (approximately 386 parking spaces)

One Penn Plaza
Suite 715
New York, NY 10119
P 212.857.7350

Figure 1: Site Location Map



CEQR TRANSPORTATION ANALYSIS SCREENING

According to the *2021 CEQR Technical Manual* procedures for transportation analysis, a two-tiered screening process is to be undertaken to determine whether a quantified analysis is necessary. The first step, the Level 1 (Trip Generation) screening, determines whether the volume of peak hour person and vehicle trips generated by the proposed project would remain below the minimum thresholds that would necessitate further study. These thresholds are:

- 50 peak hour vehicle trip ends;
- 200 peak hour subway/rail or bus transit riders; and
- 200 peak hour pedestrian trips.

If the proposed project results in increments that would exceed any of these thresholds, a Level 2 (Trip Assignment) screening assessment is typically performed. Under this assessment, project-generated trips (for each mode that exceeds the Level 1 thresholds listed above) are assigned to and from the site through their respective networks (streets, bus and subway lines, sidewalks, etc.) based on expected origin-destination patterns and travel routes.

Level 1 Screening Assessment (Trip Generation)

The travel demand factors used to calculate the projected number of trips were obtained primarily from the *2021 CEQR Technical Manual*, American Community Survey (ACS) journey to work data, information provided by New York City Department of Transportation (NYCDOT), and from other New York City environmental impact studies such as the *East New York Rezoning FEIS (2016) and Brooklyn Developmental Center Mixed-Use Project FEIS (2021)*. Table 2 provides the travel demand assumptions used for the weekday AM, midday, and PM peak hours, and Table 3 provides the travel demand assumptions used for the Saturday and Sunday peak hours.

Table 2: Weekday Travel Demand Characteristics

Rates	Residential	Local Retail	Food Store	Performing Arts Center	Trade School
Person Trip Gen Rate (Weekday)	8.18[1] *per DU*	329[1] *per 1,000 sf*	256[1] *per 1,000 sf*	27[5] *per 1,000 sf*	26.6[1] *per 1,000 sf*
Linked Trip Credit	0%	5%	5%	0%	0%
Temporal Distribution					
Weekday AM Peak	9%[3]	5%[3]	4%[3]	1%[5]	16%[1]
Weekday Midday Peak	6%[3]	8%[3]	7%[3]	16%[5]	10.7%[7]
Weekday PM Peak	8%[3]	11%[3]	11%[3]	13%[5]	26%[1]
Modal Split					
Auto	30%[2, 6]	11%[3]	30%[8]	19.5%[5]	20%[9]
Taxi	0%[2, 6]	0%[3]	3%[8]	10%[5]	1%[9]
Bus	18%[2, 6]	2%[3]	5%[8]	20%[5]	24%[9]
Subway (via bus)	23%[2, 6]	3%[3]	5%[8]	20%[5]	47%[9]
Subway (via shuttle)	23%[2, 6]	-	-	-	-
Walk	6%[2, 6]	84%[3]	57%[8]	30.5%[5]	8%[9]
Vehicle Occupancy					
Auto	1.04[2]	2.00[4]	2.00[8]	1.60[5]	1.10[9]
Taxi	1.04[2]	2.00[4]	2.00[8]	1.20[5]	1.10[9]
Shuttle Bus	25[6]	-	-	-	
Directional Split (In/Out)					
Weekday AM Peak	22%/78%[3]	53%/50%[3]	51%/49%[3]	61%/39%[5]	94%/6%[7]
Weekday Midday Peak	50%/50%[3]	50%/50%[3]	51%/49%[3]	55%/45%[5]	46%/54%[7]
Weekday PM Peak	63%/37%[3]	50%/50%[3]	50%/50%[3]	29%/71%[5]	44%/56%[7]
Delivery Trip Gen (Weekday)	0.06[1] *per DU*	0.35[1] *per 1,000 sf*	0.35[1] *per 1,000 sf*	0.14[5] *per 1,000 sf*	0.29[7] *per 1,000 sf*
Delivery Temporal Distribution					
Weekday AM Peak	12%[1]	8%[1]	10%[1]	6%[5]	9.6%[7]
Weekday Midday Peak	9%[1]	11%[1]	8%[1]	6%[5]	11%[7]
Weekday PM Peak	2%[1]	2%[1]	5%[1]	1%[5]	1%[7]
Delivery Trip Directional Split (In/Out) - 50%/50%					

Source:

(1) *2021 CEQR Technical Manual*
(2) 2013 - 2017 American Community Survey's journey to work data for Brooklyn census tracts 982, 1018, 1058.01, 1058.04, and 1104
(3) New York City Department of Transportation survey information for residential use, local retail, and food store use (in Brooklyn non-transit zone)
(4) Information provided by NYC DOT
(5) *Spofford Campus FEIS*
(6) VHB Assumptions
(7) *Downtown Jamaica Redevelopment Plan FEIS, 2007*
(8) *Brooklyn Developmental Center Mixed-Use Project FEIS, 2021*
(9) *Melrose Commons FEIS, 2011*

Table 2: Weekday Travel Demand Characteristics (continued)

Rates	Daycare Children	Daycare Parents	Daycare Staff	Medical Office	Passive Open Space
Person Trip Gen Rate (Weekday)	22[1] *per 1,000 sf*	44[1] *per 1,000 sf*	6[1] *per 1,000 sf*	76[1] *per 1,000 sf*	44[5] *Per acre*
Linked Trip Credit	0%	0%	0%	0%	0%
Temporal Distribution					
Weekday AM Peak	25%[1]	25%[1]	25%[1]	11%[1]	3%[5]
Weekday Midday Peak	0%[1]	0%[1]	2.5%[1]	13%[1]	14%[5]
Weekday PM Peak	25%[1]	25%[1]	25%[1]	9%[1]	14%[5]
Modal Split					
Auto	-	-	50%[4]	58%[1]	20%[6]
Auto Pick-up/Drop-off	30%[2]	-	-	-	-
Taxi	0%[2]	-	1%[4]	15%[1]	1%[6]
Bus	18%[2]	18%[2]	18%[4]	8%[1]	11%[6]
Subway	46%[2]	46%[2]	21%[4]	7%[1]	12%[6]
Walk	6%[2]	6%[2]	10%[4]	12%[1]	56%[6]
Vehicle Occupancy					
Auto	1.00[1]	-	1.13[4]	1.50[1]	2.90[6]
Taxi	1.00[1]	-	1.13[4]	1.50[1]	3.00[3]
Directional Split (In/Out)					
Weekday AM Peak	100%/0%[1]	50%/50%[1]	100%/0%[1]	62%/38%[1]	59%/41%[1]
Weekday Midday Peak	50%/50%[1]	50%/50%[1]	50%/50%[1]	47%/53%[1]	55%/45%[1]
Weekday PM Peak	0%/100%[1]	50%/50%[1]	0%/100%[1]	35%/65%[1]	55/45%[1]
Delivery Trip Gen (Weekday)	0.07[3] *per 1,000 sf*	- -	- -	0.4[3] *per 1,000 sf*	0.01[6] *Per acre*
Delivery Temporal Distribution					
Weekday AM Peak	9.6%[3]	-	-	9.7%[3]	6%[6]
Weekday Midday Peak	11.0%[3]	-	-	7.8%[3]	6%[6]
Weekday PM Peak	1.0%[3]	-	-	5.1%[3]	1%[6]
Delivery Trip Directional Split (In/Out) - 50%/50%					

Source:
(1) New York City Department of Transportation surveys
(2) Based on residential journey to work assumptions
(3) *East New York Rezoning FEIS, 2016*
(4) 2012 - 2016 American Community Survey Special Tabulation: Transportation Planning (NYCDCP) reverse journey to work data (CTPP Part 3 Table A302103) for Brooklyn census tracts 982, 1018, 1058.01, 1058.04, and 1104
(5) *2021 CEQR Technical Manual*
(6) *300 Huntington EAS, 2020*

Table 3: Weekend Travel Demand Characteristics

Rates	Residential	Local Retail	Food Store	Performing Arts Center	Trade School
Person Trip Gen Rate (Saturday/Sunday)	9.08/8.54[1, 3] *per DU*	358/314[1, 3] *per 1,000 SF*	300/284[1, 3] *per 1,000 SF*	2.7/2.7[5, 8] *per seat*	13.5/13.5[1, 8] *per 1,000 SF*
Linked Trip Credit	0%	5%	5%	0%	0%
Temporal Distribution					
Saturday Peak	8%[3]	12%[3]	9%[1]	10%[5]	16%[1]
Sunday Peak	9%[3]	12.7%[3]	10%[3]	10%[8]	16%[8]
Modal Split					
Auto	30%[2, 6]	11%[3]	30%[11]	19.5%[5]	20%[9]
Taxi	0%[2, 6]	0%[3]	3%[11]	10%[5]	1%[9]
Bus	18%[2, 6]	2%[3]	5%[11]	20%[5]	24%[9]
Subway (via bus)	23%[2, 6]	3%[3]	5%[11]	20%[5]	47%[9]
Subway (via shuttle)	23%[2, 6]	-	-	-	-
Walk	6%[2, 6]	84%[3]	57%[11]	30.5%[5]	8%[9]
Vehicle Occupancy					
Auto	1.04[2]	2.00[4]	2.00[11]	2.90[5]	1.10[9]
Taxi	1.04[2]	2.00[4]	2.00[11]	2.30[5]	1.10[9]
Shuttle Bus	25[6]	-	-	-	
Directional Split (In/Out)					
Saturday Peak	51%/49%[3]	50%/50%[3]	50%/50%[11]	0%/100%[5]	57%/43%[7]
Sunday Peak	48%/52%[3]	51%/49%[3]	51%/49%[11]	0%/100%[8]	57%/43%[8]
Delivery Trip Gen (Saturday/Sunday)	0.02/0.02[1, 8] *per DU*	0.04/0.35[1, 10] *per 1,000 SF*	0.04/0.04[1, 8] *per 1,000 SF*	0.04/0.04[5, 8] *per 1,000 SF*	0/0[7, 8] *per 1,000 SF*
Delivery Temporal Distribution					
Saturday Peak	9%[1]	11%[1]	10%[1]	11%[5]	0%[7]
Sunday Peak	9%[8]	0%[10]	10%[8]	11%[8]	0%[8]
Delivery Trip Directional Split (In/Out) - 50%/50%					

Source:

(1) *2021 CEQR Technical Manual*
(2) 2013 - 2017 American Community Survey's journey to work data for Brooklyn census tracts 982, 1018, 1058.01, 1058.04, and 1104
(3) New York City Department of Transportation survey information for residential use, local retail, use and food store use (in Brooklyn non-transit zone)
(4) Information provided by NYC DOT
(5) *Spofford Campus FEIS*
(6) VHB Assumptions
(7) *Downtown Jamaica Redevelopment Plan FEIS, 2007*
(8) Assumed similar travel demand assumptions for the Saturday and Sunday peak hours
(9) *Melrose Commons FEIS, 2011*
(10) *Brooklyn Bridge Park Project FEIS, 2005*
(11) *Brooklyn Developmental Center Mixed-Use Project FEIS, 2021*

Table 3: Weekend Travel Demand Characteristics (continued)

Rates	Daycare Children	Daycare Parents	Daycare Staff	Medical Office	Passive Open Space
Person Trip Gen Rate (Saturday/Sunday)	22/22[1, 7] *per 1,000 sf*	44/44[1, 7] *per 1,000 sf*	6/6[1, 7] *per 1,000 sf*	39/39[1,7] *per 1,000 sf*	62/62[5, 7] *Per acre*
Linked Trip Credit	0%	0%	0%	0%	0%
Temporal Distribution					
Saturday Peak	25%[1]	25%[1]	25%[1]	17%[1]	16%[5]
Sunday Peak	25%[7]	25%[7]	25%[7]	17%[7]	16%[7]
Modal Split					
Auto	-	-	50%[4]	58%[1]	20%[6]
Auto Pick-up/Drop-off	30%[2]	-	-	-	-
Taxi	0%[2]	-	1%[4]	15%[1]	1%[6]
Bus	18%[2]	18.0%[2]	18%[4]	8%[1]	11%[6]
Subway	46%[2]	46.0%[2]	21%[4]	7%[1]	12%[6]
Walk	6%[2]	6.0%[2]	10%[4]	12%[1]	56%[6]
Vehicle Occupancy					
Auto	1.00[1]	-	1.13[4]	1.50[1]	2.90[6]
Taxi	1.00[1]	-	1.13[4]	1.50[1]	3.00[3]
Directional Split (In/Out)					
Saturday Peak	0%/100%[1]	50%/50%[1]	0%/100%[1]	49%/51%[1]	55%/45%[6]
Sunday Peak	0%/100%[7]	50%/50%[7]	0%/100%[7]	49%/51%[7]	55%/45%[7]
Delivery Trip Gen (Saturday/Sunday)	0.0/0.0[3, 7] *per 1,000 sf*	- -	- -	0.0/0.0[3,7] *per 1,000 sf*	0.01/0.01[6, 7] *Per acre*
Delivery Temporal Distribution					
Saturday Peak	0%[3]	-	-	0%[3]	0%[6]
Sunday Peak	0%[7]	-	-	0%[7]	0%[7]
Delivery Trip Directional Split (In/Out) - 50%/50%					

Source:
(1) New York City Department of Transportation surveys
(2) Based on residential journey to work assumptions
(3) *East New York Rezoning FEIS, 2016*
(4) 2012 - 2016 American Community Survey Special Tabulation: Transportation Planning (NYCDCP) reverse journey to work data (CTPP Part 3 Table A302103) for Brooklyn census tracts 982, 1018, 1058.01, 1058.04, and 1104
(5) *2021 CEQR Technical Manual*
(6) *300 Huntington EAS, 2020*
(7) Assumed similar travel demand assumptions for the Saturday and Sunday peak hours

Residential

For the residential use, trip generation rates of 8.18 daily person trips per DU for weekday and 9.08 daily person trips per DU for Saturday were obtained from the *2021 CEQR Technical Manual*. Temporal distributions of 9 percent, 6 percent, 8 percent, and 8 percent for the weekday AM, midday, PM, and Saturday peak hours, respectively, were provided by NYC DOT. The Sunday trip generation rate of 8.54 daily person trips per DU and the Sunday peak hour temporal distribution of 9 percent was based on NYCDOT's latest surveys of residential uses. Once completed, the proposed project would provide shuttle bus service for residents to the East 105th Street subway station (served by the L subway line) and the Pennsylvania Avenue subway station (served by the No. 3 subway line). Visitors to the CCC will also have access to shuttle buses to be provided by the Applicant. It is expected that the shuttle buses would have a 25-seat capacity. Modal splits of 30 percent by auto, 18 percent by bus, 46 percent by subway (due to the distance of the subway stations from the project, it is assumed that residents would either use public bus or shuttle bus service to access the subway; half of the residential subway trips are assumed to use the shuttle bus service and the other half were assumed to use public bus service), and 6 percent by walk, and vehicle occupancies of 1.04 persons per auto or taxi during the peak hours, were based on the 2013 - 2017 ACS journey to work data for Brooklyn census tracts 982, 1018, 1058.01, 1058.04, and 1104 and adjusted to reflect a lower auto share due to the shuttle bus access. The directional distributions of 22 percent "in" for the weekday AM peak hour, 50 percent "in" for the weekday midday peak hour, 63 percent "in" for the weekday PM peak hour, 51 percent "in" for the Saturday peak hour, and 48 percent "in" during the Sunday peak hour were also based on information provided by NYC DOT.

For residential delivery trips, trip generation rates of 0.06 and 0.02 daily delivery trips per DU for the weekday and Saturday peak hours, respectively, and temporal distributions of 12 percent, 9 percent, 2 percent, and 9 percent for the weekday AM, midday, PM, and Saturday peak hours, respectively, were obtained from the *2021 CEQR Technical Manual*. Sunday peak hour delivery trips were assumed to be similar to the Saturday peak hour.

Local Retail

For the local retail use, trip generation rates of 329 daily person trips per 1,000 sf for weekday and 358 daily person trips per 1,000 sf for Saturday were obtained from the *2021 CEQR Technical Manual*, and a trip generation rate of 314 daily person trips per 1,000 sf for Sunday was provided by NYC DOT. A linked trip credit of 5 percent was assumed. Weekday, Saturday, and Sunday peak hour directional and temporal distributions were based on NYC DOT surveys. The temporal distributions used were 5 percent, 8 percent, 11 percent, 12 percent, and 12.7 percent for the weekday AM, midday, PM, Saturday, and the Sunday peak hours, respectively, and the directional distributions used were 53 percent "in", 50 percent "in", 50 percent "in", 50 percent "in", and 51 percent "in" for the weekday AM, midday, PM, Saturday, and Sunday peak hours, respectively. The modal splits of 11 percent by auto, 2 percent by bus, 3 percent by subway (via bus), and 84 percent by walk were based on NYCDOT surveys of local retail use in Brooklyn non-transit zones, and vehicle occupancies of 2.00 persons per auto or taxi were obtained from the *East New York Rezoning FEIS (2016)*.

For retail delivery trips, trip generation rates of 0.35 and 0.04 daily delivery trips per 1,000 sf for the weekday and Saturday peak hours, respectively, and a temporal distribution of 8 percent, 11 percent, 2 percent, and 11 percent for the weekday AM, midday, PM, and Saturday peak hours, respectively, were obtained from the *2021 CEQR Technical Manual*. A trip generation rate of 0.35 daily delivery trips per DU, and temporal distribution of 0 percent during the Sunday peak hour was obtained from the *Brooklyn Bridge Park Project FEIS (2005)*.

Food Store

The food store use was assumed to be similar to that of a FRESH food or smaller food store to serve the local area. Trip generation rates of 256 daily person trips per 1,000 sf for weekday and 300 daily person trips per 1,000 sf for Saturday were obtained from the *2021 CEQR Technical Manual* and a linked trip credit of 5 percent was assumed. A trip generation rate of 284 daily person trips per 1,000 sf for Sunday was provided by NYC DOT. The temporal distribution and directional split were also provided by NYC DOT while the modal split and vehicle occupancy were obtained from the *Brooklyn Development Center Mixed-Use FEIS (2021)*. The temporal distributions used for the AM, midday, PM, Saturday, and Sunday peak hours were 4 percent, 7 percent, 11 percent, 9 percent and 10 percent, respectively, and the directional splits used were 51 percent "in", 51 percent "in", 50 percent "in", 50 percent "in" and 51 percent "in" for the weekday AM, midday, PM, Saturday and Sunday peak hours, respectively. The modal splits of 30 percent by auto, 3 percent by taxi, 5 percent by bus, 5 percent by subway (via bus), and 57 percent by walk, and vehicle occupancies of 2.00 persons per auto or taxi, were used for all peak hours.

For food store delivery trips, trip generation rates of 0.35 and 0.04 daily delivery trips per 1,000 sf for weekday and weekend, respectively, and a temporal distribution of 10 percent, 8 percent, 5 percent, and 10 percent for the weekday AM, midday, PM, and weekend peak hours, respectively, were obtained from the *2021 CEQR Technical Manual*.

Performing Arts Center

The performing arts center would serve local community groups, including the CCC, and will serve as a venue for shows and events, and for community meetings. Travel demand factors for the performing arts center use were obtained from the *Spofford Campus EIS (2018)*; although the performing arts center would not be expected to have events during church service, the Sunday peak hour assumed the same trip generation assumptions as the Saturday peak hour to provide a conservative analysis. Trip generation rates of 27 daily person trips per 1000 sf for weekdays and 2.7 daily person tips per seat for the weekend were used. The temporal distributions used for the AM, midday, PM, weekend peak hours were 1 percent, 16 percent, 13 percent, and 10 percent, respectively, and the directional splits used were 61 percent "in", 55 percent "in", 29 percent "in", and 0 percent "in" for the weekday AM, midday, PM, and weekend peak hours, respectively. The modal splits of 19.5 percent by auto, 10 percent by taxi, 20 percent by bus, 20 percent by subway (via bus), and 30.5 percent by walk were used during all peak hours. Vehicle occupancies of 1.60 persons per auto and 1.20 per taxi were used during the weekday peak hours and vehicle occupancies of 2.90 persons per auto and 2.30 per taxi were used during the weekend peak hours.

For performing arts center delivery trips, a trip generation rate of 0.14 and 0.04 daily delivery trips per 1000 sf for weekday and weekday, respectively, and a temporal distribution of 6 percent, 6 percent, 1 percent, and 11 percent for the weekday AM, midday, PM, and weekend peak hours, respectively.

Trade School

A trip generation rate of 26.6 daily person trips per 1,000 sf for weekdays and 13.5 daily person trips per 1,000 sf for Saturdays were obtained from the *2021 CEQR Technical Manual*. Weekday and Saturday temporal distributions of 16 percent, 26 percent, and 16 percent for the weekday AM, PM, and Saturday peak hours, respectively, were obtained from the *2021 CEQR Technical Manual*. Since a weekday midday peak hour temporal distribution is not provided in the *2021 CEQR Technical Manual*, it was assumed to be 10.7 percent which was obtained from the professional school use found in the *Downtown Jamaica Redevelopment Plan FEIS (2007)*. Modal splits and vehicle occupancy were based on the professional school use from the *Melrose Commons FEIS (2011)*. The modal splits assumed were 20 percent by auto, 1 percent by taxi, 24 percent by bus, 47 percent by subway (via bus), and 8 percent by walk. Vehicle occupancies of 1.10

persons per auto or taxi were assumed. Directional distributions of 94 percent "in", 46 percent "in", 44 percent "in", and 57 percent "in" for the weekday AM, midday, PM, and weekend peak hours, respectively, were assumed from the *Downtown Jamaica Redevelopment Plan FEIS (2007)*.

For trade school delivery trips, trip generation rate of 0.29 daily trucks per 1,000 sf for the weekday and temporal distribution of 9.6 percent, 11 percent, and 1 percent for the weekday AM, midday, and PM peak hours, respectively, were obtained from the *Downtown Jamaica Redevelopment Plan FEIS (2007)*. No delivery trips were assumed during the weekend.

Daycare Children

Trip generation rates of 22 daily person trips per 1,000 sf was assumed for both weekday and weekends, and a temporal distribution of 25 percent was used for the weekday AM, PM, Saturday, and Sunday peak hours; no trips are expected during the weekday midday peak hour. The directional distributions used were 100 percent "in" during the weekday AM peak hour, and 0 percent "in" during the weekday PM and weekend peak hours. The trip generation rates and temporal and directional distributions were based on NYCDOT surveys of daycare facilities. Peak hour modal splits of 30 percent by auto pick-up and drop-off, 18 percent by bus, 36 percent by subway (via bus), and 6 percent by walk were based on the journey to work assumptions used for the residential use. Vehicle occupancies of 1.00 person per and taxi were assumed based on NYC DOT guidance.

For daycare delivery trips, a weekday trip generation rate of 0.07 daily delivery trips per 1,000 sf and temporal distributions of 9.6 percent, 11 percent, and 1 percent for the weekday AM, midday, and PM peak hours, respectively, were obtained from the *East New York Rezoning FEIS (2016)*. No delivery trips were assumed during the weekend.

Daycare Parents

Trip generation rates, and temporal and directional distributions for daycare parent trips were based on NYCDOT surveys of daycare facilities. A trip generation rate of 44 daily person trips per 1,000 sf was assumed for the weekday and weekend, and temporal distributions of 25 percent (50 percent "in") was assumed for the weekday AM, PM, Saturday, midday and Sunday peak hours; no trips are expected during the weekday midday peak hour. The modal split of 18 percent by bus, 46 percent by subway, and 6 percent by walk was assumed during the peak hours analyzed and were based the journey to work assumptions used for the residential use; auto pick-up and drop-off trips are accounted for in the daycare children trip generation estimates. No delivery trips are associated with this use.

Daycare Staff

Trip generation rates of 6 daily person trips per 1,000 sf was assumed for both weekday and weekends, and a temporal distribution of 25 percent was used for the weekday AM, PM, Saturday, and Sunday peak hours and 2.5 percent for the weekday midday peak hour. The directional distributions used were 100 percent "in" during the weekday AM peak hour, and 0 percent "in" during the weekday PM and weekend peak hours. The trip generation rates and temporal and directional distributions were based on NYCDOT surveys of daycare facilities. The modal split of 50 percent by auto, 1 percent by taxi, 18 percent by bus, 21 percent by subway, and 10 percent by walk and vehicle occupancy of 1.13 for auto and taxi were obtained from the New York City Department of City Planning's Special Tabulation of American Community Survey 2006 – 2010 reverse journey to work data (CTPP Part 3 Table A302103) for Brooklyn Census Tracts 982, 1018, 1058.01, 1058.04, and 1104. No delivery trips are associated with this use.

Medical Office

For the medical office use, the weekday and Saturday trip generation rates, temporal and directional distributions, modal splits and vehicle occupancies were based on information provided by NYC DOT; the travel demand factors used for the Saturday peak hour were assumed for the Sunday peak hour. Trip generation rates of 76 daily person trips per 1,000 sf for weekday and 39.0 daily person trips per 1,000 sf for the weekend. The temporal distributions were 11 percent, 13 percent, 9 percent, and 17 percent for the weekday AM, weekday midday, weekday PM, and weekend peak hours, respectively. For both weekday and weekend, modal splits of 58 percent by auto, 15 percent by taxi, 8 percent by bus, 7 percent by subway, and 12 percent by walking were used. For all periods, an auto and taxi vehicle occupancy rate of 1.50 was used. The directional distributions were 62 percent "in" for the weekday AM peak hour, 47 percent "in" for the weekday midday peak hour, 35 percent "in" for the weekday PM peak hour, and 49 percent "in" for the weekend peak hours.

For medical office delivery trips, trip generation rates of 0.40 per 1,000 sf for the weekday, and temporal distributions of 9.7 percent, 7.8 percent and 5.1 percent for the weekday AM, midday, and PM peak hours, respectively, were obtained from the *East New York Rezoning FEIS (2016)*. No delivery trips are expected during the weekends.

Passive Open Space

A trip generation rate of 44 daily person trips per acre for weekdays and 62 daily person trips per acre for Saturdays were obtained from the *2021 CEQR Technical Manual*. Weekday and Saturday temporal distributions of 3 percent, 14 percent, 14 percent, and 16 percent for the weekday AM, midday, PM, and Saturday peak hours, respectively, were obtained from information provided by NYC DOT. Sunday peak hour travel characteristics were assumed to be similar to the Saturday peak hour. Modal splits and auto vehicle occupancies were based on the *300 Huntington EAS (2020)*. The modal splits assumed were 20 percent by auto, 1 percent by taxi, 11 percent by bus, 12 percent by subway, and 56 percent by walk. A vehicle occupancy of 2.90 persons per auto and 3.00 persons per taxi was assumed. Directional distributions of 59 percent "in", 55 percent "in", and 55 percent "in" for the weekday hours were provided by NYC DOT. Directional distributions of 55 percent "in" for the weekend peak hours were obtained from the *300 Huntington EAS (2020)*.

For passive open space delivery trips, a trip generation rate of 0.01 daily trucks per acre for the weekday and weekend peak hours was obtained from the *300 Huntington EAS (2020)*. Temporal distributions of 6 percent, 6 percent, 1 percent, and 0 percent for the weekday AM, midday, PM, and weekend peak hours, respectively, were also obtained from the *300 Huntington EAS (2020)*.

Level 1 Screening Results

Transit and Pedestrians

The total number of pedestrian trips generated by the proposed project are provided in Table 4 and would be expected to exceed the *2021 CEQR Technical Manual* Level 1 screening thresholds for transit and pedestrians.

- During the weekday AM peak hour, the project would generate 363 bus trips, 865 subway trips, and 2,293 pedestrian trips (walk plus bus and subway).
- During the weekday midday peak hour, the project would generate 259 bus trips, 561 subway trips, and 2,442 pedestrian trips.
- During the weekday PM peak hour, the project would generate 389 bus trips, 871 subway trips, and 3,510 pedestrian trips.
- During the Saturday peak hour, the project would generate 408 bus trips, 911 subway trips, and 3,928 pedestrian trips.
- During the Sunday peak hour, the project would generate 422 bus trips, 949 subway trips, and 3,835 pedestrian trips.

Since the number of peak hour bus, subway, and pedestrian trips expected to be generated by the proposed project exceed the CEQR thresholds of 200 pedestrian trips per hour, a Level 2 trip assignment is needed to determine the scope of the detailed pedestrian and transit analyses.

Table 4: With-Action Condition Trip Generation Summary – Person Trips

Mode	Weekday AM			Weekday Midday			Weekday PM		
	In	Out	Total	In	Out	Total	In	Out	Total
Auto	231	446	677	319	319	638	461	384	845
Auto Pick-up/ Drop-off	20	0	20	0	0	0	0	20	20
Taxi	11	7	18	15	15	30	11	17	28
Bus	121	242	363	129	130	259	214	175	389
Subway (via bus)	194	324	518	166	165	331	297	263	560
Walk	541	524	1,065	813	809	1,622	1,128	1,122	2,250
Subway (via shuttle bus)	76	271	347	115	115	230	196	115	311
Total	1,194	1,814	3,008	1,557	1,553	3,110	2,307	2,096	4,403
Mode	**Saturday**			**Sunday**					
	In	**Out**	**Total**	**In**	**Out**	**Total**			
Auto	452	474	926	448	485	933			
Auto Pick-up/ Drop-off	0	20	20	0	20	20			
Taxi	11	19	30	11	19	30			
Bus	190	218	408	192	230	422			
Subway (via bus)	263	309	572	263	324	587			
Walk	1,289	1,320	2,609	1,237	1,227	2,464			
Subway (via shuttle bus)	171	168	339	174	188	362			
Total	2,376	2,528	4,904	2,325	2,493	4,818			

Traffic and Parking

Table 5 summarizes the total peak hour vehicular volumes ("ins" plus "outs") for the proposed project under the With-Action condition. The hourly vehicle trips generated by the proposed project would be 668 vehicles per hour (vph) during the weekday AM peak hour, 536 vph in the weekday midday peak hour, 722 vph in weekday PM peak hour, 771 vph in the Saturday peak hour, 789 vph in the Sunday peak hour. Since the volume of vehicle trips generated by the proposed project would exceed the 50-vehicle trip threshold during all peak hours, a Level 2 trip assignment is needed to determine the scope of the detailed traffic analysis.

Table 5: With-Action Condition Trip Generation Summary – Vehicle Trips

Mode	Weekday AM			Weekday Midday			Weekday PM		
	In	Out	Total	In	Out	Total	In	Out	Total
Auto	177	391	568	236	236	472	356	274	630
Auto Pick-up/ Drop-off	20	20	40	0	0	0	20	20	40
Taxi	11	11	22	20	20	40	18	18	36
Delivery Vehicle	8	8	16	7	7	14	0	0	0
Shuttle Bus	11	11	22	5	5	10	8	8	16
Total	227	441	668	268	268	536	402	320	722
Mode	**Saturday**			**Sunday**					
	In	**Out**	**Total**	**In**	**Out**	**Total**			
Auto	337	348	685	335	366	701			
Auto Pick-up/ Drop-off	20	20	40	20	20	40			
Taxi	15	15	30	15	15	30			
Delivery Vehicle	1	1	2	1	1	2			
Shuttle Bus	7	7	14	8	8	16			
Total	380	391	771	379	410	789			

Level 2 Screening Assessment (Trip Assignment)

As shown above, the number of trips generated by the proposed project would exceed the *2021 CEQR Technical Manual* Level 1 screening thresholds for vehicle, transit, and pedestrian trips during the peak hours analyzed. Project generated trips were assigned through the surrounding street network based on expected routes to and from the project site.

Transit and Pedestrians

Transit and pedestrian trips were assigned through the pedestrian network based on logical and direct travel routes to and from the project site from neighborhood attractions, subway stations and/or bus stops, to determine if the number of additional pedestrian trips generated by the proposed project would exceed 200 peak hour pedestrian trips at key pedestrian elements (e.g. crosswalks, sidewalks, corner reservoir areas) approaching the site – the threshold for detailed pedestrian analysis. The project site is bordered by Flatlands Avenue to the north, Louisiana Avenue to the west, Pennsylvania Avenue to the east, and Vandalia Avenue to the south.

Bus transit options within the project site vicinity include the B6, B60, B82, B82 SBS, B83, and B103 bus routes. The B82 SBS only operates on the weekdays. The BM2 and BM5 bus routes also stop within the project vicinity but it is assumed that little to no trips would utilize these bus lines due to the infrequency at which they stop as well as the availability of other bus options that travel along similar, quicker routes. It is assumed that the majority of bus trips would use the B82 and B82 SBS bus lines (30 percent) which have stops along the development site's Flatlands Avenue and Pennsylvania Avenue frontages. Approximately 25 percent of the bus trips were assigned to the B6 bus line, 20 percent each to the B60 and B103 bus lines, and five percent to the B83 bus line.

The closest subway stations are located over a half-mile from the project site. Because of this distance to the subway stations, it is expected that all subway trips would rely on connecting bus service to access the site. Two stations were identified to provide the vast majority of subway access to the site given their proximity to the site and their connection to bus routes: the Canarsie Rockaway Parkway station serving the L subway line, and the Pennsylvania Avenue station serving the 3 subway line. Approximately 80 percent of subway trips are assumed to use the L subway line (connecting via the B82 and B82 SBS bus lines), and the remaining subway trips would use the No. 3 subway line (connecting via the B83 bus line).[1]

Walk-only pedestrian trips were assigned based on the surrounding land uses, residential populations, and notable attractions in the area. There are large public housing complexes located within the project site vicinity including the Linden Houses to the northeast, the Breukelen Houses to the west, and Starrett City to the southeast. Local commercial attractions within the project site vicinity include the shopping center on Louisiana Avenue opposite of the project to the southwest, and commercial retail stores along Pennsylvania Avenue to the northwest of the project.

Based on the pedestrian assignments described above, detailed pedestrian level of service analysis will be performed at the following pedestrian elements (crosswalks, corners, and sidewalks):

Crosswalk and Corners

- Pennsylvania Avenue and Flatlands Avenue – south and west crosswalks, and southwest corner
- Pennsylvania Avenue and Vandalia Avenue – north, south and west crosswalks, and all corners
- Flatlands Avenue and Louisiana Avenue – all crosswalks and corners
- Flatlands Avenue and Williams Avenue – all crosswalks and corners
- Flatlands Avenue and East 108th Street – north and south crosswalks, and northeast and southeast corners

Sidewalks

- South sidewalks of Flatlands Avenue between Pennsylvania and Louisiana Avenues
- North and south sidewalks of Flatlands Avenue between Louisiana and Williams Avenues
- North and south sidewalks of Flatlands Avenue between Williams Avenue and East 108th Street
- West sidewalk of Pennsylvania Avenue between Flatlands and Vandalia Avenues
- East and west sidewalks of Pennsylvania Avenue between Vandalia Avenue and Twin Pine Drive
- East sidewalk of Louisiana Avenue between Flatlands and Vandalia Avenues

Pedestrian analyses will be performed at these elements for the weekday AM, midday, PM peak hours, and Saturday peak hours. In consultation with NYCDOT, the sidewalk elements along the development Site's Flatlands Avenue, Pennsylvania Avenue, and Louisiana Avenue frontages, and crosswalks and corner elements at the intersection of Pennsylvania Avenue and Flatlands Avenue, and Flatlands Avenue and Louisiana Avenue will also be analyzed for the Sunday peak hour (coinciding with church services).

[1] The Proposed Project would provide shuttle service to the East 105th Street L subway station and the Pennsylvania Avenue No. 3 line subway station, and it is expected half of the residential subway trips would use the shuttle service to reach the subway while the other half would use public buses. However, as requested by New York City Transit, for the purpose of a conservative transit and pedestrian analysis, it is assumed that all subway trips would use public buses to reach the stations.

Subway station analyses will be performed at the Rockaway Parkway (L subway line) station for the weekday AM and PM peak hours. Bus line-haul analyses will be performed the B82, B82 SBS and B83 bus lines for the weekday AM and PM peak hours.

Traffic

Project-generated vehicle trips shown in Table 5 were assigned through the surrounding street network based on expected routes to the project site, the configuration of the street network, and the anticipated entrances to the project site. Access to the project site will be available along Flatlands Avenue, Louisiana Avenue, and southbound Pennsylvania Avenue.

Residential Trips

Residential vehicle trip assignments were based on the 2012-2016 American Community Survey's journey to work data for Brooklyn census tracts 982, 1018, 1058.01, 1058.04, and 1104. Approximately 58 percent of project-generated vehicle trips were assumed to be destined for other sections of Brooklyn. Of the remaining trips, approximately 27 percent to Queens, 8 percent of vehicle trips were assigned to Manhattan, 4 percent to the Bronx and Westchester, and 3 percent to Long Island.

Approximately 23 percent of the outbound trips were assigned to the west along Flatlands Avenue, 31 percent were assigned to the north along Pennsylvania Avenue, and 16 percent were assigned along westbound Linden Boulevard (via Pennsylvania Avenue, and other roadways such as Georgia Avenue and Malta Street). Approximately 16 percent of the trips were assigned to the south and west via the Belt Parkway towards other parts of Brooklyn and Manhattan and 8 percent were assigned to the north towards Queens and Long Island. The remaining trips (6 percent) would travel along eastbound Flatlands Avenue.

Inbound trips were assigned along similar general routes; approximately 23 percent of the trips were assigned from the west along Flatlands Avenue, 31 percent were assigned from the north along Pennsylvania Avenue, and 16 percent were assigned along eastbound Linden Boulevard (to Louisiana Avenue). Approximately 16 percent of the trips were assigned to the Belt Parkway originating from the south and west, and 8 percent would approach the development Site from the northeast. The remaining trips (6 percent) would travel along westbound Flatlands Avenue towards the project.

Local Trips

Local vehicle trip assignments were applied to land uses that would serve the immediately surrounding areas such as local retail, food store, performing arts center, daycare (children trips), medical office, and passive open space uses. Therefore, vehicle trips were generally assigned from local origins within a one-mile radius of the project site based on population densities.

Worker Trips

Worker vehicle assignments (i.e., trade school and daycare staff) were based on the 2012-2016 ACS Special Tabulation: Census Transportation Planning reverse journey to work data (CTPP Part 3 Table A302103) for Brooklyn census tracts 982, 1018, 1058.01, 1058.04, and 1104. Most trips would be expected to originate from within Brooklyn (50 percent). Of the remaining trips, approximately 25 percent of the trips would be expected to originate from Queens, 15 percent from Long Island, 4 percent from Staten Island and southern parts of New Jersey, and 6 percent from points north (such as the Bronx, Westchester, and northern parts of New Jersey).

Approximately 39 percent of the project trips were assigned along the Belt Parkway to the development Site (19 percent from the south and west, and 20 percent from the north). Approximately 26 percent of school staff trips were assigned from the north via Pennsylvania Avenue, 20 percent from the west via Linden Boulevard (accessing the project via Louisiana Avenue), and 10 percent from the west via Flatlands Avenue. The remaining trips (5 percent) were assigned from the east via westbound Flatlands Avenue. Worker trips leaving the project were assigned along similar routes.

Based on the vehicular traffic assignments described above, detailed level of services analyses will be performed at the following intersections for the weekday AM, midday, PM, and Saturday peak hours:

1. Pennsylvania Avenue and Seaview Avenue
2. Pennsylvania Avenue and Twin Pines Dr
3. Pennsylvania Avenue and Vandalia Avenue
4. Pennsylvania Avenue and Flatlands Avenue
5. Pennsylvania Avenue and Cozine Avenue
6. Pennsylvania Avenue and Wortman Avenue
7. Pennsylvania Avenue and Stanley Avenue
8. Pennsylvania Avenue and Linden Boulevard
9. Louisiana Avenue and Vandalia Avenue
10. Louisiana Avenue and Flatlands Avenue
11. Flatlands Avenue and Georgia Avenue/Site Driveway
12. Flatlands Avenue and East 108th Street
13. Flatlands Avenue and Rockaway Parkway

A subset of seven intersections will also be analyzed during the Sunday peak hour which coincides with church services. These intersections were identified in consultation with NYCDOT and include Pennsylvania Avenue with Seaview Avenue, Twin Pines Drive, Vandalia Avenue, and Flatlands Avenue, Louisiana Avenue with Flatlands Avenue and Vandalia Avenue, and the intersection of Flatlands Avenue and Georgia Avenue/Site Driveway.

In addition to the Flatlands Avenue and Georgia Avenue intersection, three additional proposed driveways along Louisiana Avenue, Flatlands Avenue at Sheffield Avenue, and Pennsylvania Avenue will be analyzed.