

A. INTRODUCTION

The purpose of this alternatives analysis is to examine reasonable and practicable options that would avoid or reduce project-related, significant adverse impacts and still meet the Proposed Project's stated goals and objectives. Two alternatives to the Proposed Project are considered in this chapter. The first is the No Action Alternative, which assumes that the 1996 Plan would be implemented and that the amendments to the Fresh Creek Urban Renewal Plan (FCURP) and associated City Map changes, zoning changes, and special permits would not occur. The second is the Lesser Impacts Alternative, which would reduce the development density to result in no unavoidable adverse traffic impacts. The following sections describe the alternatives and then compare their likely impacts with those expected from the Proposed Project. This analysis considers potential effects in 2013 when all of the elements of the Proposed Project are expected to be complete.

B. NO ACTION ALTERNATIVE

DESCRIPTION OF THE NO ACTION ALTERNATIVE

The No Action Alternative represents the future conditions in 2013 if the proposed amendments to the FCURP and related City Map changes, zoning changes, and special permits do not occur. This condition is described throughout the earlier chapters of this environmental impact statement (EIS) as "the Future without the Proposed Action." In this chapter, the No Action Alternative is compared with the Proposed Project.

The No Action Alternative would result in the implementation of the previously approved 1996 Plan for the Fresh Creek Urban Renewal Area (FCURA). In addition to the 17.4 acres of open space, the 640,000-square-foot shopping center and its associated parking lot that have already been constructed, as well as the 378 units of housing that are under construction or in advanced planning, the No Action Alternative would include the following elements:

- **Residential:** Up to 200 senior citizen housing units, 122 units of Nehemiah housing, up to 1,475 units for sale or rent to middle-income households, and 125 units to be developed for low- to moderate-income households;
- **Retail:** 15,000 square feet of neighborhood-oriented retail;
- **Community Facilities:** 30,000 square feet of community facility space, an elementary school and an intermediate school pending funding, and a 4,000 square feet nursery school;
- **Office:** 10,000 square feet of professional office space;
- **Public Open Space:** 35.5 acres of public open space, consisting of 3.1 acres of interior parks and 32.4 acres of perimeter park; and

- **Infrastructure:** New and improved infrastructure to support the 1996 Plan, including water mains, sewage disposal, drainage, and new streets.

The No Action Alternative would also incorporate the mitigation commitments of the 1996 *Gateway Estates Final Environmental Impact Statement* (1996 FEIS). Certain commitments have already been implemented, including:

- The creation of approximately 3.5 acres of high-quality wetlands;
- The creation of new high-quality grasslands on the approximately 75-acre White Island is underway. The New York City Department of Parks and Recreation (DPR) anticipates that the invasive species removal and initial site preparation will be complete in summer 2008. DPR and the New York City Department of Housing Preservation and Development (HPD) are working on securing a source for the sand necessary for the restoration establishment of grassland habitat, and hope to begin placement in Spring 2009;
- The implementation of a Construction Health and Safety Plan (CHASP) for portions of the FCURA that have been developed since 1996;
- The installation of a New York City Department of Environmental Protection (DEP)-approved methane ventilation system for buildings within the FCURA that have been constructed since 1996;
- Intersection improvements at Pennsylvania Avenue and Atlantic Avenue, Pennsylvania Avenue and Linden Boulevard, Pennsylvania Avenue and Flatlands Avenue, and Linden Boulevard and Atkins Avenue; and
- Increased service on the B6 and B13 bus routes.

Implementation of the No Action Alternative would result in fulfillment of the remainder of the mitigation commitments of the 1996 FEIS as described below.

- **Historic Resources:** Archaeological monitoring during excavation activities to mitigate the impact on potentially sensitive prehistoric and archaeological resources identified within a two-block area north of Vandalia Avenue and west of Elton Street.
- **Hazardous Materials:** Implementation of a CHASP to mitigate the potential impacts of exposure to hazardous materials during construction within undeveloped portions of the FCURA. The 1996 FEIS disclosed the presence of methane gas within the FCURA, resulting from its former use as landfill. The mitigation included implementation of a DEP-approved methane ventilation system to be installed within new buildings in the FCURA.
- **Traffic:** Improvements, such as signal timing modifications, traffic lane restriping, and parking regulation modifications, at the intersections of Pennsylvania Avenue and Liberty Avenue, and Linden Boulevard and Fountain Avenue.

As compared to the Proposed Project, the No Action Alternative would result in the same number of residential units but less retail space within the FCURA. It would also provide space for an elementary school and an intermediate school rather than an intermediate/high school, and it would provide lower density development on a somewhat different street grid. Table 24-1 compares the development program for the No Action Alternative and the Proposed Project.

Table 24-1

Comparison of the No Action Alternative and the Proposed Project

Use	No Action Alternative (1996 Plan)	Proposed Project
Housing (units)	2,385 DU	2,385 DU
Shopping Center*	0 SF	630,000 SF
Local Retail	15,000 SF	68,000 SF
Office (SF)	10,000 SF	0 SF
Community/Public Facilities		
Elementary School	1,200 Seats	0 Seats
Intermediate School	900 Seats	490 Seats
High School	0 Seats	736 Seats
Day care	4,000 SF	16,000 SF
Community Facility	30,000 SF	30,000 SF
Open Space*	35.5 Acres	36.5 Acres
Note: *The existing 640,000-sf shopping center and 9.7 acres of perimeter park within the FCURA are included as part of the existing conditions analysis.		

NO ACTION ALTERNATIVE COMPARED WITH THE PROPOSED PROJECT

LAND USE, ZONING, AND PUBLIC POLICY

Like the Proposed Project, the No Action Alternative would replace vacant land with a mix of residential, commercial, community facility, and open spaces uses, but would not include a 630,000-square-foot shopping center and its 2,050-space parking lot. Although both the No Action Alternative and the Proposed Project would represent a substantial change in land use as compared to today, both would strengthen the neighborhood by providing a much needed school, day care, community facility, and open space uses to meet the needs of the existing and new residents. The new residential uses would be comparable to residential uses on the northern side of Flatlands Avenue. Residential uses on the western edge of the site would be buffered from the industrial uses at Hendrix Creek by the creek and open space.

The No Action Alternative would conform to existing zoning; therefore, unlike the Proposed Project, a zoning change would not be required. The No Action Alternative would also not require special permits or changes to the City Map.

The Fresh Creek Urban Renewal Plan for the FCURA was established to:

- Eliminate blight and maximize appropriate land use;
- Strengthen the tax base of the city by encouraging development and employment opportunities in the area;
- Provide new housing exhibiting good design in terms of privacy, light, air, and open space;
- Provide convenient community facilities, parks and recreational uses, local and regional commercial uses, and parking; and
- Redevelop the area in a comprehensive manner, removing blight and establishing both a residential and regional commercial character for the area, with appropriate support facilities.

The No Action Alternative was approved in 1996 to meet the goals of the FCURP. While the Proposed Project would require amendments to the FCURP to change parcel sizes, permitted

uses, density, and height limits, it would continue to meet the goals of the FCURP. Therefore, both the No Action Alternative and the Proposed Project would be consistent with the public policies that govern the FCURA.

The No Action Alternative and the Proposed Project would enliven the now-vacant portions of the FCURP by providing for new residential, commercial, community facility, and open space uses, which would be consistent with City initiatives for brownfield redevelopment. Both plans would strive to meet City initiatives for housing by providing for affordable units; however, the Proposed Project would provide for substantially more affordable units (up to 2,385 units) than the No Action Alternative (910 units). Both would also meet economic development goals by creating new jobs and tax revenue sources, but because the Proposed Project would result in more commercial uses, it would result in greater economic benefits.

SOCIOECONOMIC CONDITIONS

Like the Proposed Project, the No Action Alternative would result in new development within portions of the FCURA that are currently vacant. Therefore, neither the No Action Alternative nor the Proposed Project would result in direct displacement of existing residences or businesses.

The No Action Alternative would provide 910 affordable dwelling units, and the remaining 1,425 units would be market-rate. However, neither the No Action Alternative nor the Proposed Project would introduce a population that is significantly different from the socioeconomic character of the study area's existing population.

The Proposed Project would introduce 714,000 square feet of new commercial space (a 630,000-square-foot shopping center and 68,000 square feet of local retail space) within the FCURA. Even with this new retail space, residents would continue to shop at local retail corridors for convenience, variety, and selection of items. While the possibility of some limited indirect business displacement due to competition cannot be ruled out, any displacement that might occur would not be expected to jeopardize the viability of local retail corridors and, therefore, would not be considered a significant adverse impact.

The No Action Alternative is also not likely to result in indirect displacement of businesses. The No Action Alternative would result in 25,000 square feet of new commercial uses. It is expected that these new commercial uses would serve both existing residents of the study area and the new dwelling units within the FCURA, but the volume of floor area proposed under both the No Action Alternative and the Proposed Project would not overburden the total retail square footage of the study area.

As shown in Table 24-2, the No Action Alternative and the Proposed Project would result in the same number of residents, but the No Action Alternative would generate fewer jobs. Furthermore, the No Action Alternative would result in less commercial space than the Proposed Project. The combination of new employment and retail activities under the Proposed Project would generate substantially more tax revenues than would the No Action Alternative.

Table 24-2

Residents and Workers for the No Action Alternative and the Proposed Project

	Residents	Workers
No Action Alternative	6,648	339
Proposed Project	6,648	1,737

COMMUNITY FACILITIES AND SERVICES

Schools

The No Action Alternative and other residential construction in the study area would add approximately 691 elementary, 286 intermediate, and 334 high school students by 2013. In addition, the No Action Alternative would expand school capacity with the construction of a 1,200-seat elementary school and 900-seat middle school, but it would not include a high school.

Table 24-3 compares the 2013 projected public school enrollment for the No Action Alternative and the Proposed Project. Because the No Action Alternative would result in a different school program, capacity would vary compared to the Proposed Action. The No Action Alternative would provide for a new elementary school and a new intermediate school while the Proposed Project would provide a smaller new intermediate school and a high school. As a result, the No Action Alternative would result in a lower utilization of elementary and intermediate school seats than the Proposed Project. Conversely, the No Action Alternative would result in a higher utilization of high school seats since, unlike the Proposed Project, it would not provide for a new high school.

Table 24-3

**Comparison of Elementary, Intermediate, and High School Utilizations for the
No Action Alternative and the Proposed Project**

School	No Action Alternative			Proposed Project		
	Capacity	Enrollment	Utilization	Capacity	Enrollment	Utilization
Elementary (CSD 19)	20,316	<u>15,885</u>	<u>78%</u>	19,116	<u>15,920</u>	<u>83%</u>
Intermediate (CSD 19)	7,703	<u>4,653</u>	<u>60%</u>	<u>7,293</u>	<u>4,668</u>	<u>64%</u>
High School (Brooklyn)	92,479	<u>66,556</u>	72%	<u>93,215</u>	<u>66,573</u>	71%

Overall, both the No Action Alternative and the Proposed Project would not increase school enrollment above capacity. Therefore, neither alternative would result in adverse impacts on schools.

Libraries

The No Action Alternative combined with other new development would add approximately 7,357 new residents in the ¾-mile study area by 2013. Assuming no increases in the number of Brooklyn Public Library volumes available to the public, the volume-to-resident ratio will decrease from 1.4 in existing conditions to 1.1 in 2013 with the No Action Alternative. Therefore, like the Proposed Project, the volume-to-resident ratio would decrease as compared to today, but neither alternative would result in an adverse impact on library services in the study area.

Health Care Facilities

Under the No Action Alternative, the low- to moderate-income population in the area around the Project Site would increase by approximately 7,737. Like the Proposed Project, the increase in population would not affect the overall provision of health care services, based on the existing facilities serving the area. Assuming the national average of about 390 annual emergency room visits per 1,000 low-income persons, the new low- to moderate-income residents could add a total of about 3,017 annual visits, a small increase (less than 3 percent of all hospital emergency room visits to Brookdale University Hospital in 2004).

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Day Care Centers

The No Action Alternative and other proposed development would add a total of 1,264 children under age 6 eligible for public day care by 2013. This would increase capacity to 183 percent from 90 percent in the existing condition, with a deficiency of 1,124 slots at day care facilities in the study area. This potential demand is offset by a number of limiting factors, such as the fact that private day care facilities and day care centers outside of the study area (e.g., closer to parents' places of work) are not included in this analysis. Furthermore, like the Proposed Project, the No Action Alternative includes a day care facility, and additional day care facilities may also be opened outside the FCURA by 2013 as the population within the area increases. These new facilities could alleviate crowding in the day care facilities in the study area by providing additional capacity for childcare services. Therefore, like the Proposed Project, the No Action Alternative would not result in adverse impacts to day care facilities in the study area.

The No Action Alternative and other proposed development would also add a total of 453 children between the age of 6 and 12 who would be eligible for publicly funded after school day care programs. Because these children are expected to be attending school during most of the day, their need would be for after school care and they would not affect the utilization of day care and Head Start facilities in the study area. Eligible children who qualify for ACS vouchers or other programming for after school care could be served by Family Child Care Networks or school-age slots in ACS contracted day care facilities, New York City Department of Youth and Community Development's Out of School Time programs, and/or DOE approved after school programs.

Police and Fire Protection

The No Action Alternative would not result in the direct displacement of police stations or fire houses. Therefore, like the Proposed Project, the No Action Alternative would not result in adverse impacts on the provision of police or fire protection services.

OPEN SPACE

The No Action Alternative would provide for a total of 45.2 acres of open space within the FCURA as compared to 46.2 acres for the Proposed Project. The perimeter park would have the same configuration under both plans. Although the location of interior parks would vary, the programming of these spaces would be similar, and one additional acre of interior parkland would be provided with the Proposed Project.

The No Action Alternative would generate the same number of new residents as the Proposed Project and the ratio of open space per resident would be almost same for both. Because the No Action Alternative would result in fewer workers than the Proposed Project, the ratio of open space per resident and worker would be higher under the No Action Alternative (2.28 acres per 1,000 residents and workers) than with the Proposed Project (2.08 acres). However, overall, neither the No Action Alternative nor the Proposed Project would result in adverse impacts on open space.

SHADOWS

The only sun-sensitive features on and near the Project Site are existing and proposed open space. New buildings developed as part of the No Action Alternative would cast shadows on the open space resources within the FCURA. However, given the height of these proposed

buildings, shadows would not be extensive. Therefore, like the Proposed Project, the No Action Alternative would not result in adverse shadow impacts on sun-sensitive features.

HISTORIC RESOURCES

There are no known or potential historic architectural resources listed on, or eligible for listing on, the State and National Registers of Historic Places or as New York City Landmarks on or near the Project Site. Therefore, like the Proposed Project, the No Action Alternative would not result in adverse impacts on historic resources. However, as with the Proposed Project, the No Action Alternative would be constructed within areas of that were previously determined to have archaeological sensitivity. However, as described in Chapter 7, ‘Historic Resources,’ Phase 1B archaeological fielding testing, which was undertaken following publication of the Draft Environmental Impact Statement, determined that this area is substantially disturbed. Therefore, the No Action Alternative and the Proposed Project would not result in adverse impacts on archaeological resources.

URBAN DESIGN AND VISUAL RESOURCES

Like the Proposed Project, the No Action Alternative would enliven the vacant parcel by bringing new uses to the site, including two schools, three new interior parks and new perimeter parkland; and local retail uses which would improve the appearance of the FCURA. The No Action Alternative would also create a street network on the site by extending the existing streets and creating new streets; this would link the FCURA to the surrounding area. However, the No Action Alternative would result in a lower density development than is typical of an urban setting. It would not provide for a town center and plaza space at the foot of Elton Street and would provide for less linkage between the existing shopping center and the new residential neighborhood to its north.

While development with the No Action Alternative would be visible in views north and east from Spring Creek Park and in views from the Shore Parkway, it would not create any unusually large or tall structures and would not detract from the visual appreciation of these resources. Views from Spring Creek Park would remain long across the Shore Parkway to the Fountain Avenue Landfill. Views east from the park would contain the new retail and residential development; however, they would be in keeping with building arrangements and bulk currently found in the study area. Thus, overall, the No Action Alternative, like the Proposed Project, would have a beneficial affect on the urban design and visual resources of the FCURA and the surrounding area.

NEIGHBORHOOD CHARACTER

Like the Proposed Project, the No Action Alternative would not adversely impact neighborhood character. The additional residential units would further the neighborhood’s trend toward greater residential use and, since they would be affordable, they would not introduce a population with substantially different socioeconomic characteristics. The office space and community/public facilities would be compatible with the varied land use context of the area. The development of the FCURA would be beneficial to the urban design of the neighborhood, and the new residents would generate additional demand for retailers in the neighborhood. Although traffic volumes and associated noise would be lower under the No Action Alternative than with the Proposed Project, projected increases under both the No Action Alternative and the Proposed Project

would continue to be confined to major thoroughfares and would not constitute an adverse impact on neighborhood character.

NATURAL RESOURCES

Neither the No Action Alternative nor the Proposed Project would result in construction within the 100-year or 500-year floodplain, nor would they alter the tidal wetlands of Hendrix Creek or the freshwater wetlands within the Project Site. The No Action Alternative would result in less density than the Proposed Project, but it would result in a similar area of impervious coverage. Thus, the amount of stormwater runoff discharged to Hendrix and Spring Creeks would be comparable. The No Action Alternative would result in lower quantities of sanitary sewage than the Proposed Project, but neither would result in exceedances of the permitted dry weather flows for the 26th Ward Water Pollution Control Plan (WPCP). Therefore, like the Proposed Project, the No Action Alternative would not result in adverse impacts on floodplains, wetlands, water quality, and aquatic resources.

The No Action Alternative and the Proposed Project would result in new construction within the vacant portions of the FCURA, thereby disturbing existing terrestrial habitats. Both would develop new open space, but these parks would have minimal resource value for wildlife. However, extensive habitat areas exist in close proximity to the Project Site, which provide substantial new foraging and nesting habitats for wildlife. Therefore, like the Proposed Project, the No Action Alternative would not result in adverse impacts on terrestrial species, including endangered and threatened species.

Both the No Action Alternative and the Proposed Project would not result in adverse impacts to wetlands, plant communities, wildlife, water quality, or the aquatic biota of Jamaica Bay. Thus, neither the No Action Alternative nor the Proposed Project would adversely affect the resources of Jamaica Bay responsible for its designation as a Significant Coastal Fish and Wildlife Habitat.

HAZARDOUS MATERIALS

Investigations of the Project Site identified concentrations of volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), and metals in soil and groundwater above New York State Department of Environmental Conservation (NYSDEC) standards. Additionally, a subsurface investigation conducted in 2005 identified leachable lead levels exceeding the threshold for classification as a hazardous waste in one composite sample collected from the northern portion of the site, near the intersection of Vandalia Avenue and Elton Street. Investigations conducted in 1992 and 2005 noted methane levels in soil gas samples, which is likely from decomposition of natural peat and organic matter (typically found in wetlands) and buried refuse at the Project Site. In addition, tetrachloroethene was detected at one soil-gas location in the northwest of the site.

Like the Proposed Project, the No Action Alternative would involve a variety of earthmoving/excavating activities that would encounter contamination within the fill, and mitigation would be required to reduce potential exposure for construction workers and the public in general. Per the 1996 EIS, the following mitigation would be required during construction and operation of the No Action Alternative, which has also been recommended for implementation of the Proposed Project:

- Implementation of an environmental health and safety plan (HASP);
- Testing (and pretreatment, if needed) of groundwater from any dewatering;

- Installation of cover materials (at least two feet of clean fill material) in areas not covered by buildings, paving, or other impervious surfaces.
- Installation of methane gas venting systems in all new buildings.

Overall, the potential impacts from exposure to hazardous materials within the Project Site and the measures to mitigate these effects would be the same for both the No Action Alternative and the Proposed Project.

WATERFRONT REVITALIZATION PROGRAM

The Project Site is located within the coastal zone and is consistent with New York City's Local Waterfront Revitalization Program. The No Action Alternative would result in new development on the same footprint as the Proposed Project. Although it would have substantially less retail square footage, like the Proposed Project, the No Action Alternative would include a mix of residential, community facility, commercial and open space uses. Therefore, the No Action Alternative is also considered to be consistent with the City's Local Waterfront Revitalization Program.

INFRASTRUCTURE

Because the No Action Alternative would result in less development within the FCURA than the Proposed Project, it would generate 199,300 gallons per day (gpd) less demand for water. The No Action Alternative would also result in 91,380 gpd less sanitary sewage than the Proposed Project. However, neither the No Action Alternative nor the Proposed Project would result in adverse impacts on the city's water supply or the processing capacity of the 26th Ward WPCP.

Development under the No Action Alternative and the Proposed Project would increase impervious surface within the FCURA as compared to today and would, therefore, increase stormwater runoff. The Proposed Project includes a 2,050-space surface parking lot, which would not be part of the No Action Alternative. The project sponsors would implement stormwater Best Management Practices (BMPs) such as vegetated swales and rain gardens to allow some infiltration of stormwater, temporary on-site stormwater storage to detain and control the runoff, catch basins fitted with hydrodynamic devices to remove oil and grit, and hoods to remove floatables. Other new uses proposed for the No Action Alternative and the Proposed Project would generate comparable quantities of stormwater that would be discharged to new sanitary sewers that have been or would be constructed according to DEP's standards. Therefore, stormwater generated by the No Action Alternative or the Proposed Project would not adversely impact the stormwater drainage system.

SOLID WASTE AND SANITATION SERVICES

The No Action Alternative would generate 106,274 pounds per week less solid waste than the Proposed Project. Although the No Action Alternative would generate less solid waste overall, neither the No Action Alternative nor the Proposed Project would result in adverse impacts on solid waste disposal or sanitation services. Furthermore, the No Action Alternative and the Proposed Project would generate the same amount of municipal solid waste.

ENERGY

The No Action Alternative would generate less energy demand, but neither the No Action Alternative nor the Proposed Project would result in adverse impacts on energy supplies.

TRAFFIC AND PARKING

Traffic

The No Action Alternative would have a somewhat different mix and density of uses; primarily, it would not include 630,000 square feet of destination retail space and less local retail space than the Proposed Project. Therefore, as shown in Table 24-4, the No Action Alternative would result in 598, 1,781, 1,851, 2,490, and 3,360 less vehicle trips than the Proposed Project in the weekday AM, midday, PM, Saturday midday, and Saturday PM peak hours, respectively.

Table 24-4
Comparison of Vehicle Trips Generated by the No Action Alternative and the Proposed Project

Peak Hour		No Action Alternative	Proposed Project	Net Difference (No Action Alternative – Proposed Project)
Weekday AM	In	698	1,075	-377
	Out	1,388	1,609	-221
	Total	2,086	2,684	-598
Weekday Midday	In	381	1,336	-955
	Out	380	1,206	-826
	Total	761	2,542	-1,781
Weekday PM	In	1,043	1,988	-945
	Out	530	1,436	-906
	Total	1,573	3,424	-1,851
Saturday Midday	In	621	1,949	-1,328
	Out	616	1,778	-1,162
	Total	1,237	3,727	-2,490
<u>Saturday PM</u>	<u>In</u>	<u>539</u>	<u>2,137</u>	<u>-1,598</u>
	<u>Out</u>	<u>542</u>	<u>2,304</u>	<u>-1,762</u>
	<u>Total</u>	<u>1,081</u>	<u>4,441</u>	<u>-3,360</u>

Both the No Action Alternative and the Proposed Project would result in new streets within the Project Site, but differences in the programming of uses, the location of uses, and the layout of new streets within the FCURA would result in differences in the number of intersections and expected means of traffic control (i.e., signal controlled versus stop sign controlled). For the No Action Alternative, the traffic analysis considered a total of 42 locations, 31 of which would be signalized and 11 of which would be unsignalized. For the Proposed Project, the traffic analysis included 46 intersections with 37 signalized locations and 9 unsignalized locations. Generally, the difference in the number of analysis locations and the signal control relates to new driveways that would be provided for Gateway Center Phase II under the Proposed Project.

The internal street grid within the FCURA for the No Action Alternative and the Proposed Project would vary. The No Action Alternative would include more residential streets, since houses would occupy the area that would be the shopping center and parking lot under the Proposed Project. However, the site's connections to major thoroughfares and principal routes of access to and from the Project Site would be the same for both.

Table 24-5 summarizes the overall level of service (LOS) conditions for the study area's intersections with the No Action Alternative and the Proposed Project. Table 24-5 also shows the number of individual traffic movements that would operate at LOS E or F during peak hours.

As described in Chapter 16, "Traffic and Parking," LOS A, B, and C are considered acceptable; LOS D is generally considered marginally acceptable up to mid-LOS D (45 seconds of delay for signalized intersections), and is considered unacceptable above mid-LOS D. LOS E and F are considered unacceptable. The comparison of levels of service that follows considers locations that would operate unacceptably (mid-LOS D or worse) with implementation of either the No Action Alternative or the Proposed Project.

- In the AM peak hour, there would be a total of eight signalized locations that would operate at mid-LOS D or worse under the No Action Alternative as compared to 10 intersections with the Proposed Project. With the Proposed Project, none of the unsignalized intersections would operate at an overall mid-LOS D or worse in the AM peak hour; however, there would be one unsignalized location that would operate at mid-LOS D or worse for the No Action Alternative.

Table 24-5

2013 No Action Alternative and Proposed Project Intersection Level of Service Summary

Level of Service	2013 No Action Alternative					2013 Proposed Project				
	Weekday			Saturday		Weekday			Saturday	
	AM	Midday	PM	Midday	PM	AM	Midday	PM	Midday	PM
Signalized Intersections (31 Total in No Action Alternative and 37 Total in Proposed Project)										
Overall Intersection LOS A/B	<u>12</u>	14	<u>12</u>	<u>11</u>	<u>11</u>	17	18	<u>18</u>	<u>14</u>	<u>11</u>
Overall Intersection LOS C	7	<u>11</u>	9	9	<u>9</u>	7	8	<u>7</u>	<u>9</u>	<u>6</u>
Overall Intersection LOS D*	6	3	4	4	<u>4</u>	5	5	5	5	<u>7</u>
Overall Intersection LOS E/F	6	3	6	7	<u>7</u>	8	6	7	9	<u>13</u>
Number of Signalized Intersection Movements at LOS E or F (of approximately <u>200</u> total in No Action Alternative and <u>229</u> total in Proposed Project)	<u>40</u>	<u>23</u>	<u>48</u>	<u>39</u>	<u>47</u>	48	32	61	54	<u>67</u>
Unsignalized Intersections (11 Total in No Action Alternative and 9 Total in Proposed Project)										
Overall Intersection LOS A/B	<u>10</u>	<u>11</u>	<u>10</u>	<u>11</u>	<u>11</u>	9	9	7	8	<u>6</u>
Overall Intersection LOS C	0	0	1	0	<u>0</u>	0	0	2	1	<u>2</u>
Overall Intersection LOS D*	0	0	0	0	<u>0</u>	0	0	0	0	<u>1</u>
Overall Intersection LOS E/F	1	0	0	0	<u>0</u>	0	0	0	0	<u>0</u>
Number of Unsignalized Intersection Movements at LOS E or F (of approximately <u>34</u> total in No Action Alternative and <u>28</u> total in Proposed Project)	6	0	3	2	<u>4</u>	3	1	4	4	<u>4</u>
Notes: *Table 24-5 shows intersections that operate at acceptable and unacceptable levels of service. Only intersections that operate at unacceptable levels of service are discussed in detail in the text. Two intersections analyzed as unsignalized in the 2013 No Action Alternative condition would be signalized in the 2013 Proposed Project condition. Three new signalized intersections and one new unsignalized intersection were added to the 2013 Proposed Project analysis.										

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- In the midday peak hour, there would be a total of four signalized locations that would operate at mid-LOS D or worse under the No Action Alternative as compared to eight intersections with the Proposed Project. There would be no unsignalized intersections with an overall mid-LOS D or worse under the No Action Alternative or the Proposed Project in the midday peak hour.
- In the PM peak hour, there would be a total of nine signalized locations that would operate at mid-LOS D or worse under the No Action Alternative as compared to 11 intersections with the Proposed Project. There would be no unsignalized intersections with an overall mid-LOS D or worse under the No Action Alternative or the Proposed Project in the PM peak hour.
- In the Saturday midday peak hour, there would be a total of seven signalized locations that would operate at mid-LOS D or worse under the No Action Alternative as compared to 13 intersections with the Proposed Project. There would be no unsignalized intersections with an overall mid-LOS D or worse under the No Action Alternative or the Proposed Project in the Saturday midday peak hour.
- In the Saturday PM peak hour, there would be a total of ten signalized locations that would operate at mid-LOS D or worse under the No Action Alternative as compared to 15 intersections with the Proposed Project. There would be no unsignalized intersections with an overall mid-LOS D or worse under the No Action Alternative or the Proposed Project in the Saturday PM peak hour.

In all five peak hours analyzed, the Proposed Project would result in a greater number of individual traffic movements at signalized intersections that would operate at LOS E or F than the No Action Alternative. In the weekday midday, weekday PM, and Saturday PM peak hours, the Proposed Project would also result in a greater number of individual traffic movements at unsignalized locations that would operate at LOS E or F. However, in the AM peak hour, the No Action Alternative would result in six traffic movements operating at LOS E or F at unsignalized intersections as compared to three traffic movements for the Proposed Project. There would be four traffic movements operating at LOS E or F at unsignalized intersections in the Saturday PM peak hour under both the No Action Alternative and the Proposed Project.

Highway Analysis

The No Action Alternative would result in fewer vehicle trips along the Shore Parkway and the Erskine Street interchange on and off-ramps than the Proposed Project. The reduction in trips resulting from the No Action Alternative would be approximately 35 to 390 vph during the peak analysis hours.

During the weekday PM peak hour, two Shore Parkway segments that are expected to operate at LOS E for the Proposed Project would operate at LOS D for the No Action Alternative, while one segment that would operate at LOS F for the Proposed Project would operate at LOS E for the No Action Alternative. During the Saturday PM peak hour, one Shore Parkway segment that is expected to operate at LOS E for the Proposed Project would operate at LOS D for the No Action Alternative, while one segment that would operate at LOS F for the Proposed Project would operate at LOS E for the No Action Alternative. During the weekday AM, midday, and Saturday midday peak hours, all Shore Parkway segments would operate at the same level of service for both the No Action Alternative and the Proposed Project. Decreases in speeds from the No Action Alternative to the Proposed Project would range from 0.9 mph to 3.7 mph.

Parking

The No Action Alternative would not change demand for off-street parking at the existing Gateway Center, and the existing parking lot would have adequate capacity to meet existing demand.

As with the Proposed Project, the new roadways that would be constructed within the FCURA under the No Action Alternative would provide for new on-street parking spaces. It is estimated that the No Action Alternative would provide approximately 960 new on-street parking spaces. In addition, the residential uses would provide 1,140 additional parking spaces. According to 2000 Census data for Brooklyn Community District 5, the average vehicle ownership per household is 0.51, so there would be adequate off-street parking for the residential use. On-street parking would also be sufficient for the other proposed uses.

TRANSIT AND PEDESTRIANS

Like the Proposed Project, the No Action Alternative would generate new subway trips in the AM and PM peak hours. Regardless, there would be adequate capacity at the Canarsie-Rockaway Parkway (L), New Lots Avenue (3, 4), and Euclid Avenue (A, C) subway stations such that the analyzed stairways and control areas would operate at LOS C or better under both the No Action Alternative and the Proposed Project, and neither alternative would result in adverse impacts on subway station operations.

The Project Site is currently served by four bus routes, the B6, B13, B83, and Q8. Table 24-6 shows the number of existing buses on these routes during peak hours as well as the number of buses that would be needed in 2013 for the No Action Alternative and the Proposed Project. Since both alternatives would require increased service to meet their project-generated demand, they would both result in adverse impacts on bus operations.

Table 24-6
2013 No Action Alternative and Proposed Project Required Peak
Hour Bus Runs

Route	Peak Hour	Buses per Hour		
		Existing	No Action Alternative	Proposed Project
B6 LTD	AM	<u>8</u>	<u>19</u>	<u>25</u>
	PM	<u>8</u>	<u>16</u>	<u>21</u>
B13	AM	<u>5</u>	<u>11</u>	<u>15</u>
	PM	<u>5</u>	<u>10</u>	<u>15</u>
<u>B83</u>	AM	<u>10</u>	<u>13</u>	<u>16</u>
	PM	<u>14</u>	<u>14</u>	<u>14</u>
<u>Q8</u>	AM	<u>5</u>	<u>6</u>	<u>7</u>
	PM	<u>5</u>	<u>6</u>	<u>7</u>
Note: The numbers cited for the Proposed Project account for mitigation.				

The Proposed Project would provide for a bus turnaround, which is a transit benefit since it would allow New York City Transit (NYCT) to enhance existing service and potentially extend new routes to the Project Site. A turnaround would not be included in the No Action Alternative, which could preclude NYCT's ability to enhance bus operations.

Both the No Action Alternative and the Proposed Project would generate new pedestrian trips within and near the FCURA. Existing sidewalks, corners, and crosswalks in the vicinity of the FCURA are lightly traveled today, and the increased volumes associated with the No Action

Alternative or the Proposed Project would not be expected to adversely impact their operation. Both the No Action Alternative and the Proposed Project would include new sidewalks, corners, and crosswalks within the FCURA that would be designed to meet the New York City Department of Transportation's (DOT's) standards. The facilities would, therefore, be adequately sized to meet the demand generated by either the No Action Alternative or the Proposed Project.

AIR QUALITY

The Proposed Project would not result in significant adverse impacts on air quality from either mobile or stationary source emissions. As described above, the No Action Alternative would generate fewer vehicle trips than the Proposed Project; therefore, its development would result in lower vehicle emissions at nearby intersections. The No Action Alternative would also result in lower emissions from on-site parking facilities since it would not include a large, new surface lot. Both the No Action Alternative and the Proposed Project would generate point source emissions from new heating, ventilation, and air conditioning (HVAC) systems, but since the No Action Alternative would include less commercial development, its HVAC emissions would be lower. Overall, the No Action Alternative would be expected to generate lower emissions than the Proposed Project, but neither alternative would result in adverse impacts on air quality.

NOISE

As described above, the Proposed Project would result in higher vehicle volumes than the No Action Alternative, but the Proposed Project's predicted noise levels would be only marginally higher. As shown in Table 24-7, the greatest increase in noise levels between the No Action Alternative and the Proposed Project would be 2 dBA, and a change of this magnitude is not perceptible. Therefore, although noise levels would be slightly lower with the No Action Alternative, neither alternative would result in adverse impacts from noise.

Table 24-7
2013 No Action Alternative and Proposed Project
Noise Levels (in dBA)

Site	Day	Time	2013 No Action L _{eq(1)}	2013 Proposed Project L _{eq(1)}	Change
1	Weekday	MD	65.1	67.1	2.0
	Weekday	PM	63.5	64.9	1.4
	Weekday	LN	66.7	68.2	1.5
	Weekend	MD	67.5	69.0	1.5
2	Weekday	MD	<u>67.0</u>	<u>67.3</u>	<u>0.3</u>
	Weekday	PM	<u>62.9</u>	<u>64.3</u>	<u>1.4</u>
	Weekday	LN	<u>61.2</u>	<u>62.5</u>	<u>1.3</u>
	Weekend	MD	<u>59.6</u>	<u>60.5</u>	<u>0.9</u>
3	Weekday	MD	<u>74.0</u>	<u>75.1</u>	<u>1.1</u>
	Weekday	PM	<u>72.4</u>	<u>73.1</u>	<u>0.7</u>
	Weekday	LN	68.7	69.6	0.9
	Weekend	MD	<u>73.0</u>	<u>74.2</u>	<u>1.2</u>
4	Weekday	MD	<u>57.1</u>	<u>57.9</u>	<u>0.8</u>
	Weekday	PM	<u>55.0</u>	<u>55.4</u>	0.4
	Weekday	LN	<u>58.3</u>	<u>58.8</u>	0.5
	Weekend	MD	<u>56.9</u>	<u>57.3</u>	<u>0.4</u>

CONSTRUCTION IMPACTS

Like the Proposed Project, the No Action Alternative may result in temporary traffic, air quality, and/or noise impacts during its construction. Like the Proposed Project, the construction of the No Action Alternative would comply with the New York City Noise Code. Further, the Proposed Project has committed to the use of emission reduction technologies and ultra low sulfur diesel fuel for construction equipment. It is expected that developers of the No Action Alternative would make similar commitments. Both alternatives would also generate new vehicle trips by construction workers and construction deliveries, which could result in temporary impacts at certain intersections.

Since the No Action Alternative's construction would be undertaken in accordance with the mitigation commitments of the 1996 EIS, archaeological monitoring would be conducted on the portion of the site determined sensitive for archaeological resources. The potential impacts from exposure to hazardous materials within the Project Site and the measures to mitigate these effects would be the same for both the No Action Alternative and the Proposed Project.

PUBLIC HEALTH

Like the Proposed Project, the No Action Alternative would not be expected to adversely impact public health. The No Action Alternative would not result in exceedances of National Ambient Air Quality Standards or substantial increases in noise, and measures would be undertaken during construction to remediate residual contamination within the Project Site.

C. LESSER IMPACTS ALTERNATIVE

DESCRIPTION OF THE LESSER IMPACTS ALTERNATIVE

As described in Chapter 23, "Unavoidable Adverse Impacts," the Proposed Project would result in significant adverse impacts at six intersections (three to four locations per time period) that cannot be mitigated. An analysis was prepared to determine the incremental volume of vehicles that could be introduced at these locations with traffic improvements such that impacts would be fully mitigated. The intersection of Atlantic and Pennsylvania Avenues was determined to be the location that was most constrained in terms of unmitigated impacts, and it was concluded that if an increment of 5 vehicles per hour were added at this location, impacts could be fully mitigated, which would represent a 93 percent decrease in retail square footage as compared to the Proposed Project; more than five vehicles per hour would result in unmitigatable impacts. Table 24-8 compares the development programs for the Proposed Project and the No Unavoidable Adverse Impacts Alternative.

LESSER IMPACTS ALTERNATIVE COMPARED WITH THE PROPOSED PROJECT

LAND USE, ZONING, AND PUBLIC POLICY

Like the Proposed Project, the Lesser Impacts Alternative would replace vacant land with a mix of residential, commercial, community facility, and open spaces uses, but would include less local retail space, a smaller shopping center, and possibly a smaller parking lot. Although both the Lesser Impacts Alternative and the Proposed Project would represent a substantial change in land use as compared to today, both would strengthen the neighborhood by providing much needed school, day care, community facility, and open space uses to meet the needs of the existing and new residents. The new residential uses would be comparable to residential uses on the

northern side of Flatlands Avenue. Residential uses on the western edge of the site would be buffered from the industrial uses at Hendrix Creek by the creek and open space.

Table 24-8
Comparison of the Lesser Impacts Alternative and the Proposed Project

Use	Proposed Project	No Unavoidable Adverse Impacts Alternative
Housing (units)	2,385 DU	2,385 DU
Shopping Center*	630,000 SF	44,000 SF
Local Retail	68,000 SF	5,000 SF
Office (SF)	0 SF	0 SF
Community/Public Facilities		
Elementary School	0 Seats	0 Seats
Intermediate School	490 Seats	490 Seats
High School	736 Seats	736 Seats
Day care	16,000 SF	16,000 SF
Community Facility	30,000 SF	30,000 SF
Open Space*	36.5 Acres	36.5 Acres
Note: *The existing 640,000-sf shopping center and 9.7 acres of perimeter park within the FCURA are included as part of the existing conditions analysis.		

Like the Proposed Project, the Lesser Impacts Alternative would require a zoning change to extend the C4-2 district north to encompass the area of the new shopping center. The Lesser Impacts Alternative would also require changes to the City Map, and a special permit for signs would also likely be needed.

Both the Proposed Project and the Lesser Impacts Alternative would require amendments to the FCURP to change parcel sizes, permitted uses, density, and height limits, but both would continue to meet the goals of the FCURP. Therefore, both the Lesser Impacts Alternative and the Proposed Project would be consistent with the public policies that govern the FCURA.

The Lesser Impacts Alternative and the Proposed Project would enliven the now-vacant portions of the FCURP by providing for new residential, commercial, community facility, and open space uses, which would be consistent with City initiatives for brownfield redevelopment. Both plans would strive to meet City initiatives for housing by providing for 2,385 affordable units. Both would also meet economic development goals by creating new jobs and tax revenue sources, but because the Proposed Project would result in substantially more commercial use, it would result in much greater economic benefit.

SOCIOECONOMIC CONDITIONS

Like the Proposed Project, the Lesser Impacts Alternative would result in new development within portions of the FCURA that are currently vacant. Therefore, neither the Lesser Impacts Alternative nor the Proposed Project would result in direct displacement of existing residences or businesses.

Both the Lesser Impacts Alternative and the Proposed Project would provide for 2,385 affordable housing units within the FCURA, but neither would introduce a population that is significantly different from the socioeconomic character of the study area's existing population.

The Proposed Project would introduce 714,000 square feet of new commercial space; whereas, the Lesser Impacts Alternative would result in 49,000 square feet of new commercial space.

Even with this new retail space, residents would continue to shop at local retail corridors for convenience, variety, and selection of items. While the possibility of some limited indirect business displacement due to competition cannot be ruled out, any displacement that might occur would not be expected to jeopardize the viability of local retail corridors and, therefore, would not be considered a significant adverse impact.

As shown in Table 24-9, the Lesser Impacts Alternative and the Proposed Project would result in the same number of residents, but the Lesser Impacts Alternative would generate fewer jobs. The Lesser Impacts Alternative would also result in substantially less commercial space than the Proposed Project. The combination of new employment and retail activities with the Proposed Project would generate greater tax revenues than would be realized with the Lesser Impacts Alternative.

Table 24-9
Residents and Workers for the Lesser Impacts Alternative and the Proposed Project

	Residents	Workers
<u>Lesser Impacts</u> Alternative	6,648	<u>488</u>
Proposed Project	6,648	<u>1,737</u>

As described in Chapter 3, “Socioeconomic Conditions,” public incentives would be sought to develop the Proposed Project, and it is anticipated that many of these programs would also be used for implementation of the Lesser Impacts Alternative. However, the Lesser Impacts Alternative would result in substantially less commercial space and approximately 1,249 fewer jobs. Furthermore, the disposition of property to the retail developer would provide funds for the development of affordable housing and infrastructure within the FCURA. A smaller retail development, as would be the case under the Lesser Impacts Alternative, would presumably generate fewer funds from the sale of the land. Thus, although the public expenditures could be similar for both the Proposed Project and the Lesser Impacts Alternative, the Lesser Impacts Alternative would provide for fewer subsidies to fund necessary improvements within the FCURA and has less long-term public benefits from income and sales tax revenues.

COMMUNITY FACILITIES AND SERVICES

Schools

The Lesser Impacts Alternative and the Proposed Project would result in the same number of new school-aged children, and both would set aside land for the construction of a new intermediate/high school on the Project Site. Therefore, the effects of the Lesser Impacts Alternative and the Proposed Project on school enrollment would be the same, and neither would result in significant adverse impacts on schools.

Libraries

The Lesser Impacts Alternative and the Proposed Project would result in the same number of new residents on the Project Site, and neither the Lesser Impacts Alternative nor the Proposed Project would result in an adverse impact on library services in the study area.

Health Care Facilities

The Lesser Impacts Alternative and the Proposed Project would result in the same number of low- and moderate-income residents on the Project Site, and neither the Lesser Impacts

Gateway Estates II

Alternative nor the Proposed Project would result in an adverse impact on health care facilities in the study area.

Day Care Centers

The Lesser Impacts Alternative would result in the same number of low-income children that qualify for public day care as the Proposed Project, and, like the Proposed Project, the Lesser Impacts Alternative would include a day care facility. Therefore, like the Proposed Project, the Lesser Impacts Alternative would not result in adverse impacts to day care facilities in the study area.

Police and Fire Protection

The Lesser Impacts Alternative would not result in the direct displacement of police stations or fire houses. Therefore, like the Proposed Project, the Lesser Impacts Alternative would not result in adverse impacts on the provision of police or fire protection services.

OPEN SPACE

Both the Lesser Impacts Alternative and the Proposed Project would provide for a total of 46.2 acres of open space within the FCURA. Although the Lesser Impacts Alternative and the Proposed Project would generate the same number of residents within the study area, the Lesser Impacts Alternative would result in fewer workers. Therefore, the ratio of open space per resident would be the same for both, but the Proposed Project, the ratio of open space per resident and worker would be higher under the Lesser Impacts Alternative than with the Proposed Project. However, overall, neither the Lesser Impacts Alternative nor the Proposed Project would result in adverse impacts on open space.

SHADOWS

The only sun-sensitive features on and near the Project Site are existing and proposed open space. New buildings developed as part of the Lesser Impacts Alternative would cast shadows on the open space resources within the FCURA. However, given the maximum height (75 Feet) and proposed location of the tallest buildings, shadows would not be extensive. Therefore, like the Proposed Project, the Lesser Impacts Alternative would not result in adverse shadow impacts on sun-sensitive features.

HISTORIC RESOURCES

There are no known or potential historic architectural resources on or near the Project Site listed on, or eligible for listing on, the State and National Registers of Historic Places or as New York City Landmarks. Therefore, like the Proposed Project, the Lesser Impacts Alternative would not result in adverse impacts on historic resources. As with the Proposed Project, the Lesser Impacts Alternative would be constructed within areas that were previously identified as having potential archaeological sensitivity, but archaeological field testing, which was undertaken following publication of the Draft Environmental Impact Statement, determined that these areas are substantially disturbed. Thus, neither the Lesser Impacts Alternative nor the Proposed Project would result in significant adverse impacts on archaeological resources.

URBAN DESIGN AND VISUAL RESOURCES

Like the Proposed Project, the Lesser Impacts Alternative would enliven the vacant parcel by bringing new uses to the site, including a school, three open spaces and local and destination retail uses which would improve the appearance of the FCURA. The Lesser Impacts Alternative would result in a smaller shopping center and possibly a smaller parking lot, which may provide for more buffer space between the retail center and the surrounding streets and alleys. The Lesser Impacts Alternative would create a street network on the site by extending the existing streets and creating new streets; this would link the FCURA to the surrounding area. While development with the Lesser Impacts Alternative would be visible in views north and east from the parkland within the FCURA and in views from the Shore Parkway, it would not create any unusually large or tall structures and would not detract from the visual appreciation of these resources. Views from the parkland within the FCURA would remain long across the Shore Parkway to the Fountain Avenue Landfill. Views east from the park would contain the new retail and residential development; however, they would be in keeping with building arrangements and bulk currently found in the study area. Thus, overall, the Lesser Impacts Alternative, like the Proposed Project, would have a beneficial affect on the urban design and visual resources of the FCURA and the surrounding area.

NEIGHBORHOOD CHARACTER

Like the Proposed Project, the Lesser Impacts Alternative would not adversely impact neighborhood character. The additional residential units would further the neighborhood's trend toward greater residential use and, since they would be affordable, they would not introduce a population with substantially different socioeconomic characteristics. The retail space and community/public facilities would be compatible with the varied land use context of the area. The development of the FCURA would be beneficial to the urban design of the neighborhood, and the new residents would generate additional demand for retailers in the neighborhood. Traffic volumes would be less than with the Proposed Project. Although additional intersections would become congested, impacts would be fully mitigated. Noise levels would also increase, but would continue to be confined to major thoroughfares.

NATURAL RESOURCES

Neither the Lesser Impacts Alternative nor the Proposed Project would result in construction within the 100-year or 500-year floodplain, nor would they alter the tidal wetlands of Hendrix Creek or the freshwater wetlands within the Project Site. The Lesser Impacts Alternative may result in less impervious surface than the Proposed Project, but the amount of stormwater runoff discharged to Hendrix and Spring Creeks would be comparable. The Lesser Impacts Alternative would result in lower quantities of sanitary sewage than the Proposed Project, but neither alternative would result in exceedances of the permitted dry weather flows for the 26th Ward WPCP. Therefore, like the Proposed Project, the Lesser Impacts Alternative would not result in adverse impacts on floodplains, wetlands, water quality, and aquatic resources.

The Lesser Impacts Alternative and the Proposed Project would result in new construction within the vacant portions of the FCURA, thereby disturbing existing terrestrial habitats. Both would develop 36.5 acres of new open space, but these parks would have minimal resource value for wildlife. However, extensive habitat areas exist in close proximity to the Project Site, which provide substantial new foraging and nesting habitats for wildlife. Therefore, like the

Proposed Project, the Lesser Impacts Alternative would not result in adverse impacts on terrestrial species, including endangered and threatened species.

Both the Lesser Impacts Alternative and the Proposed Project would not result in adverse impacts to wetlands, plant communities, wildlife, water quality, or the aquatic biota of Jamaica Bay. Thus, neither the Lesser Impacts Alternative nor the Proposed Project would adversely affect the resources of Jamaica Bay responsible for its designation as a Significant Coastal Fish and Wildlife Habitat.

HAZARDOUS MATERIALS

Like the Proposed Project, the Lesser Impacts Alternative would involve a variety of earthmoving/excavating activities that would encounter contamination within the fill, and mitigation would be required to reduce potential exposure for construction workers and the public in general. To prevent exposure to these hazardous materials, mitigation would be required during construction and operation of the Lesser Impacts Alternative and, overall, the potential impacts from exposure to hazardous materials within the Project Site and the measures to mitigate these effects would be the same for both.

WATERFRONT REVITALIZATION PROGRAM

The Project Site is located within the coastal zone and is consistent with New York City's Local Waterfront Revitalization Program. The Lesser Impacts Alternative would result in new development on the same site as the Proposed Project and would include a similar mix of uses. Therefore, the Lesser Impacts Alternative is also considered to be consistent with the City's Local Waterfront Revitalization Program.

INFRASTRUCTURE

Because the Lesser Impacts Alternative would result in less development within the FCURA than the Proposed Project, it would generate less demand for water. The Lesser Impacts Alternative would also result in less sanitary sewage than the Proposed Project. However, neither the Lesser Impacts Alternative nor the Proposed Project would result in adverse impacts on the city's water supply or the processing capacity of the 26th Ward WPCP.

Proposed development under the Lesser Impacts Alternative and the Proposed Project would create new impervious surface within the FCURA; however, because the shopping center and possibly its parking lot would be smaller, the Lesser Impacts Alternative may result in less coverage. With the Proposed Project, the project sponsors would implement stormwater BMPs such as vegetated swales and rain gardens to allow some infiltration of stormwater, temporary on-site stormwater storage to detain and control the runoff, catch basins fitted with hydrodynamic devices to remove oil and grit, and hoods to remove floatables. It is anticipated that BMPs would also be implemented for the Lesser Impacts Alternative. Other new buildings, streets, and paved surfaces proposed for the Lesser Impacts Alternative and the Proposed Project would generate comparable quantities of stormwater that would be discharged to new stormwater sewers that have been or would be constructed according to DEP's standards. Therefore, stormwater generated by the Lesser Impacts Alternative or the Proposed Project would not adversely impact the stormwater drainage system.

SOLID WASTE AND SANITATION SERVICES

The Lesser Impacts Alternative would generate less solid waste than the Proposed Project, but the amount of municipal solid waste would be the same for both. Nevertheless, neither the Lesser Impacts Alternative nor the Proposed Project would result in adverse impacts on solid waste disposal or sanitation services.

ENERGY

The Lesser Impacts Alternative would generate less energy demand, but neither the Lesser Impacts Alternative nor the Proposed Project would result in adverse impacts on energy supplies.

TRAFFIC AND PARKING

Table 24-10 compares the vehicle volumes generated by the Lesser Impacts Alternative and the Proposed Project. The Lesser Impacts Alternative would generate 21, 66, 48, 62, and 70 percent fewer vehicle trips than Proposed Project in the weekday AM, midday, PM, Saturday midday, and Saturday PM peak hours, respectively.

Table 24-10
Comparison of Vehicle Trips Generated by the Lesser Impacts Alternative and the Proposed Project

Peak Hour	Lesser Impacts Alternative			Proposed Project			Net Difference (Proposed Project - Lesser Impacts Alternative)		
	In	Out	Total	In	Out	Total	In	Out	Total
AM	733	1,391	2,124	1,075	1,609	2,684	342	218	560
Midday	438	426	864	1,336	1,206	2,542	898	780	1,678
PM	1,154	646	1,800	1,988	1,436	3,424	834	790	1,624
Saturday Midday	725	694	1,419	1,949	1,778	3,727	1,224	1,084	2,308
Saturday PM	<u>647</u>	<u>677</u>	<u>1,324</u>	<u>2,137</u>	<u>2,304</u>	<u>4,441</u>	<u>1,490</u>	<u>1,627</u>	<u>3,117</u>

Both the Proposed Project and the Lesser Impacts Alternative would result in significant adverse traffic impacts. However, because the commercial space would be substantially reduced under the Lesser Impacts Alternative, it would result in fewer impacts than the Proposed Project, and all of its impacts could be fully mitigated.

Like the Proposed Project, the Lesser Impacts Alternative would provide for new on- and off-street parking within the FCURA, but the parking lot for the shopping center would probably be smaller. Nevertheless, neither the Proposed Project nor the Lesser Impacts Alternative would result in a shortfall of parking.

TRANSIT AND PEDESTRIANS

Because the Lesser Impacts Alternative would result in less retail than the Proposed Project, it would generate fewer transit and pedestrian trips. However, because capacity is limited on existing bus routes that serve the study area, the Lesser Impacts Alternative, like the Proposed Project, would require additional service to meet new demand, but neither the Lesser Impacts Alternative nor the Proposed Project would result in significant adverse impacts on pedestrian circulation.

AIR QUALITY

The Lesser Impacts Alternative would generate fewer vehicle trips than the Proposed Project, but neither the Lesser Impacts Alternative nor the Proposed Project would result in significant adverse impacts from mobile source emissions. Both the Lesser Impacts Alternative and the Proposed Project would introduce new residents and workers near locations with industrial source emissions, but these emissions would not result in adverse effects on the health of future occupants of the Project Site. Thus, neither the Lesser Impacts Alternative nor the Proposed Project would result in significant adverse impacts on air quality.

NOISE

The Lesser Impacts Alternative would generate fewer vehicle trips than the Proposed Project, but neither the Lesser Impacts Alternative nor the Proposed Project would result in appreciable increases in noise. However, neither the Lesser Impacts Alternative nor the Proposed Project would result in significant adverse noise impacts.

CONSTRUCTION IMPACTS

Like the Proposed Project, the Lesser Impacts Alternative may result in temporary traffic, air quality, and/or noise impacts during its construction. Like the Proposed Project, the construction of the Lesser Impacts Alternative would comply with the New York City Noise Code; Further, the Proposed Project has committed to the use of emission reduction technologies and ultra low sulfur diesel fuel for construction equipment. It is expected that developers of the Lesser Impacts Alternative would make similar commitments. Both alternatives would also generate new vehicle trips by construction workers and construction deliveries, which could result in temporary impacts at certain intersections. As with the Proposed Project, archaeological testing would be conducted on the portion of the site determined sensitive for archaeological resources. The potential impacts from exposure to hazardous materials within the Project Site and the measures to mitigate these effects would be the same for both the Lesser Impacts Alternative and the Proposed Project.

PUBLIC HEALTH

Like the Proposed Project, the Lesser Impacts Alternative would not be expected to adversely impact public health. The Lesser Impacts Alternative would not result in exceedances of National Ambient Air Quality Standards or substantial increases in noise, and measures would be undertaken during construction to remediate residual contamination within the Project Site. *