

# DeKalb Commons

## FINAL SCOPE OF WORK FOR A TARGETED ENVIRONMENTAL IMPACT STATEMENT

CEQR NO. 18HPD078K  
ULURP NO. 200155 HAK

November 8, 2019

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### A. INTRODUCTION

This final scope of work outlines the technical areas to be analyzed in the preparation of a targeted Environmental Impact Statement (EIS) for the proposed DeKalb Commons development. The New York City Department of Housing Preservation and Development (HPD) (the “Applicant”), on behalf of DeKalb Commons NY Housing Development Fund Corporation (HDFC) (the “Project Sponsor”), is requesting the disposition of City-owned property, designation of an Urban Development Action Area, and project approval of an Urban Development Action Area Project (UDAAP) to facilitate the development of new affordable housing in the Bedford-Stuyvesant neighborhood of Brooklyn, Community District 3 (the “Proposed Actions”).

The Project Sponsor is proposing to develop eight vacant lots with a total of three buildings containing a total of approximately 84 affordable dwelling units, plus one dwelling unit for the superintendent (total of approximately 85 dwelling units), and approximately 2,512 gsf of commercial space (the “Proposed Project”). The vacant sites include a total of eight tax lots and are grouped into three Development Sites in the Bedford-Stuyvesant neighborhood. All eight lots are owned by HPD and would be conveyed to the Project Sponsor as a result of the Proposed Actions. Construction of the Proposed Project is expected to be completed in 2023.

This document provides a description of the Proposed Project and required discretionary land use actions, and includes task categories for all technical areas to be analyzed in the EIS. After reviewing an Environmental Assessment Statement (EAS) dated May 23, 2019, HPD, acting as lead agency, determined that the Proposed Actions could have the potential for significant adverse impacts in one of the 20 impact categories (Shadows) outlined in the *CEQR Technical Manual*. Therefore, a detailed assessment of likely effects in the area of Shadows will be prepared and disclosed in the Draft EIS (DEIS).

### B. REQUIRED PUBLIC APPROVALS AND REVIEW PROCEDURES

#### PROPOSED ACTIONS

As noted above, the Proposed Actions include the disposition of City-owned property, designation of an Urban Development Action Area, and project approval of an Urban Development Action Area Project (UDAAP) to facilitate the development of new affordable housing in the Bedford-Stuyvesant neighborhood of Brooklyn. All eight lots are owned by HPD and would and would be conveyed to the Project Sponsor as a result of the Proposed Actions.

## CITY ENVIRONMENTAL QUALITY REVIEW (CEQR) AND SCOPING

The Proposed Project is subject to environmental review pursuant to CEQR procedures. An EAS was completed on May 23, 2019. A Positive Declaration, issued on June 4, 2019, established that the Proposed Project may have a significant adverse impact on the environment, thus warranting the preparation of a targeted Environmental Impact Statement (EIS). The NYC Department of Housing Preservation and Development (HPD), as lead agency, has directed that an EIS be prepared.

The CEQR scoping process is intended to focus the EIS on those issues that are most pertinent to the Proposed Project. The process at the same time allows other agencies and the public a voice in framing the scope of the EIS. This scoping document sets forth the analyses and methodologies that will be utilized to prepare the EIS. During the period for scoping, those interested in reviewing the Draft Scope may do so and give their comments to the lead agency. The Draft Scope of Work for the EIS (dated May 23, 2019) was distributed along with a public notice of a scoping meeting on July 16, 2019. A public scoping session on the Draft Scope of Work was held on Tuesday, July 16, 2019 at 6:30 PM at Restoration Plaza, 1368 Fulton Street, Brooklyn, NY 11216. The period for submitting written comments remained open for 10 days after the hearing (until 5:00 PM on July 26, 2019). No comments from the general public, either in writing or orally, were received on the Draft Scope of Work. This Final Scope of Work will be used as a framework for preparing the Draft EIS (DEIS) for the Proposed Project.

Once the lead agency is satisfied that the DEIS is complete, the document will be made available for public review and comment. Issuance of the Notice of Completion signals the start of the public review period for the DEIS. During this time the public may review and comment on the DEIS, either in writing and/or at a public hearing that is convened for the purpose of receiving such comments. A public hearing will be held on the DEIS in conjunction with the CPC hearing on the ULURP 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 incorporate all substantive comments made on the DEIS, along with any revisions to the technical analysis necessary to respond to those comments. The FEIS will then be used by the decision makers to evaluate project impacts and proposed mitigation measures before deciding whether to approve the requested discretionary actions.

## C. DESCRIPTION OF THE PROPOSED PROJECT

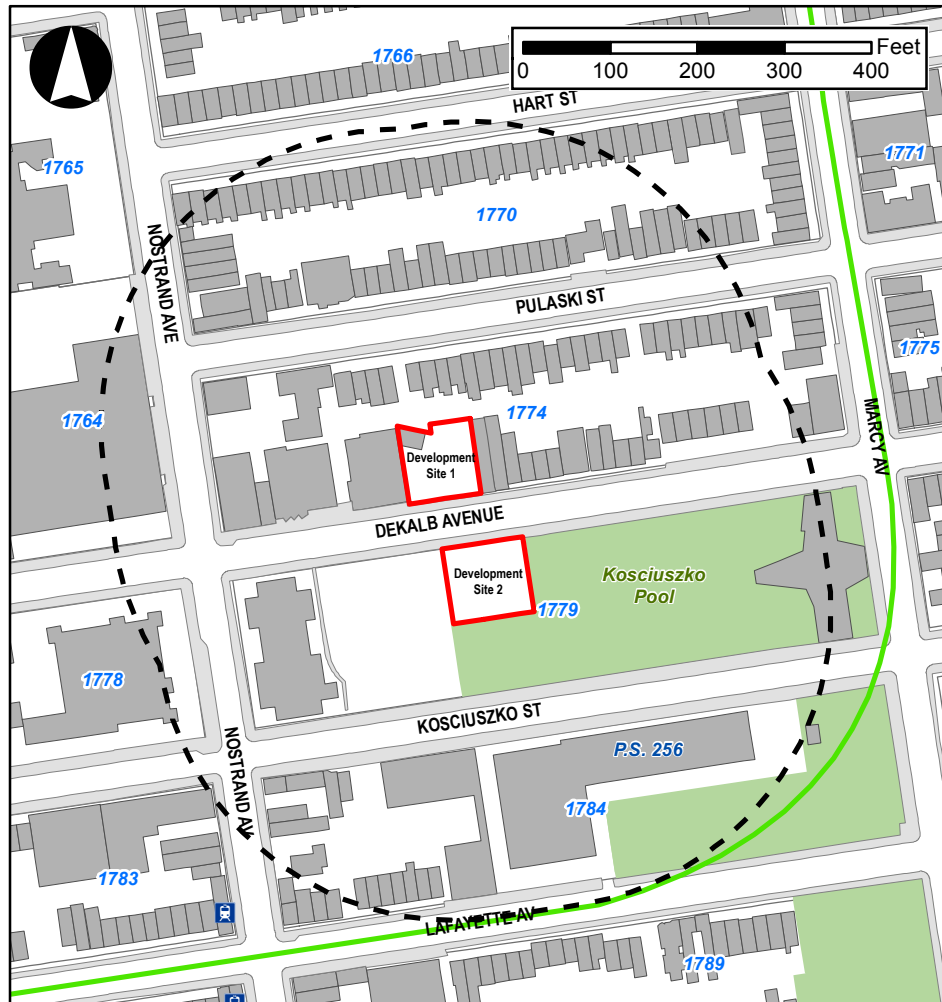
### *Project Site*

The project area is comprised of eight tax lots, which are grouped into three Development Sites in the Bedford-Stuyvesant neighborhood (see **Figure 1 & Table 1**). Development Site 1 consists of four tax lots (Block 1774, Lots 74, 75, 76, and 77), totaling approximately 9,827 square feet (sf). All four lots are currently vacant. Development Site 1 has approximately 100 feet of frontage along the north side of DeKalb Avenue between Nostrand and Marcy Avenues. Development Site 1 is zoned R6A.

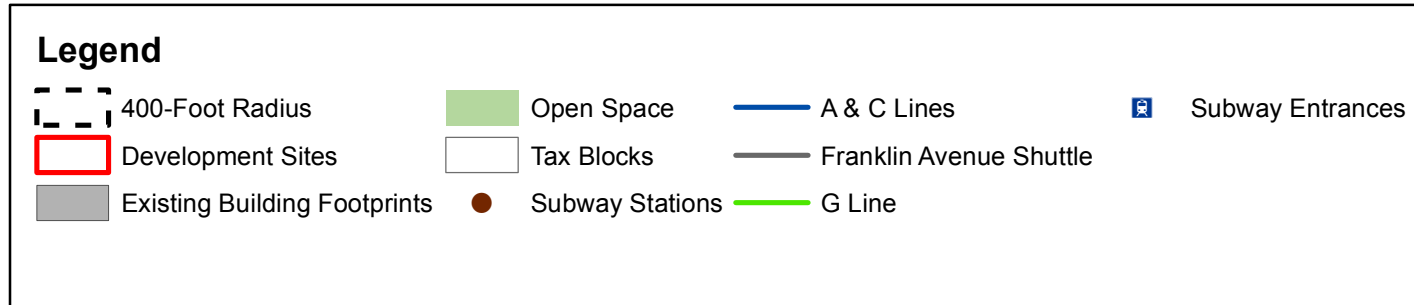
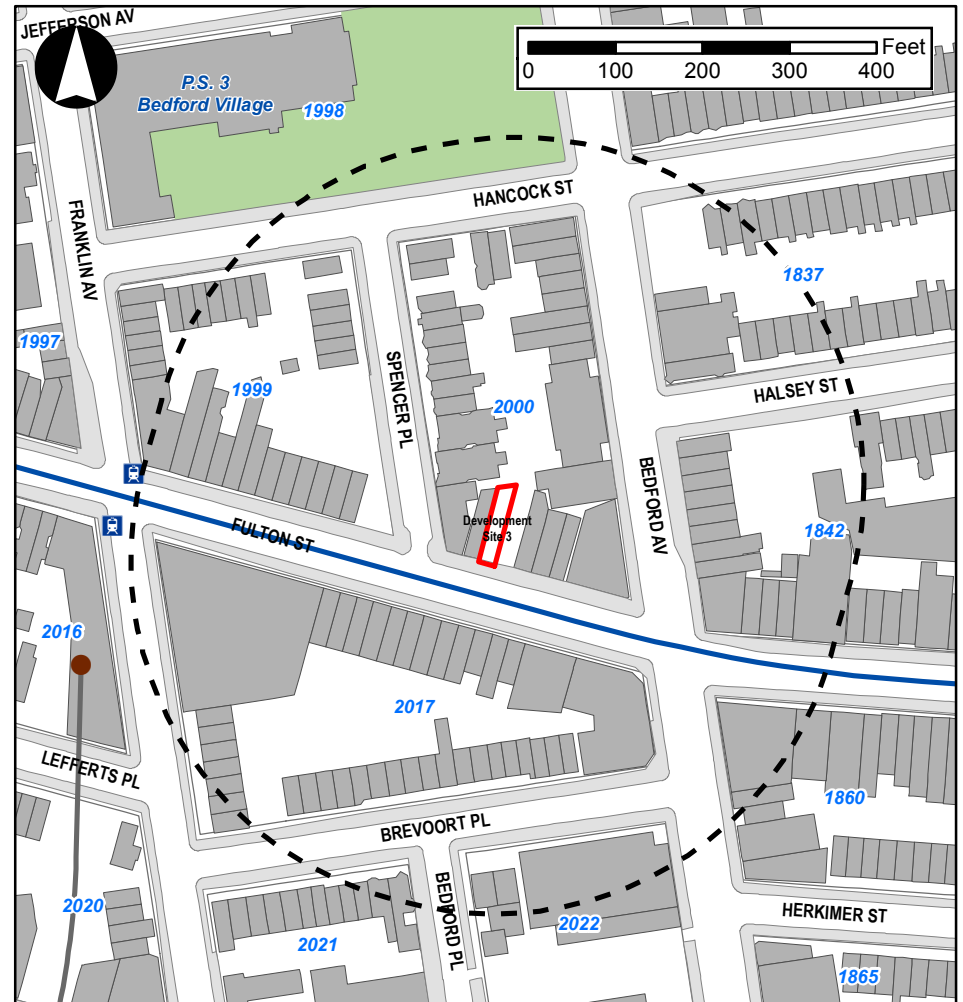
Development Site 2 consists of three tax lots (Block 1779, Lot 22, 24, and 26), totaling approximately 10,983 sf. All three lots are currently vacant. Development Site 2 has approximately 109 feet of frontage along the south side of DeKalb Avenue. Development Site 2 is zoned R6A.

Development Site 3 consists of one tax lot (Block 2000, Lot 43), totalling approximately 1,786 sf. Development Site 3, which is vacant, has approximately 20 feet of frontage along the north side of Fulton

633-639 & 648-654 DeKalb Avenue:



1187 Fulton Street:



Street between Spencer Place and Bedford Avenue (see **Figure 1**). Development Site 3 is zoned R7D/C2-4.

**Table A-1: Project Site Existing Conditions**

Block	Lot	Address	Zoning District	Land Use	Lot Area (SF)
<b>Development Site 1</b>					
1774	74, 75, 76, 77	633-639 DeKalb Avenue	R6A	Vacant	9,827
<b>Development Site 2</b>					
1779	22, 24, 26	648-654 DeKalb Avenue	R6A	Vacant	10,983
<b>Development Site 3</b>					
2000	43	1187 Fulton Street	R7D/C2-4	Vacant	1,786
				<b>Total</b>	<b>22,596</b>

### **Surrounding Area**

As the Project Area consists of three separate Development Sites, existing land uses within 400 feet of each Development Site is discussed below and shown in **Figure 2**.

#### *Development Sites 1 & 2*

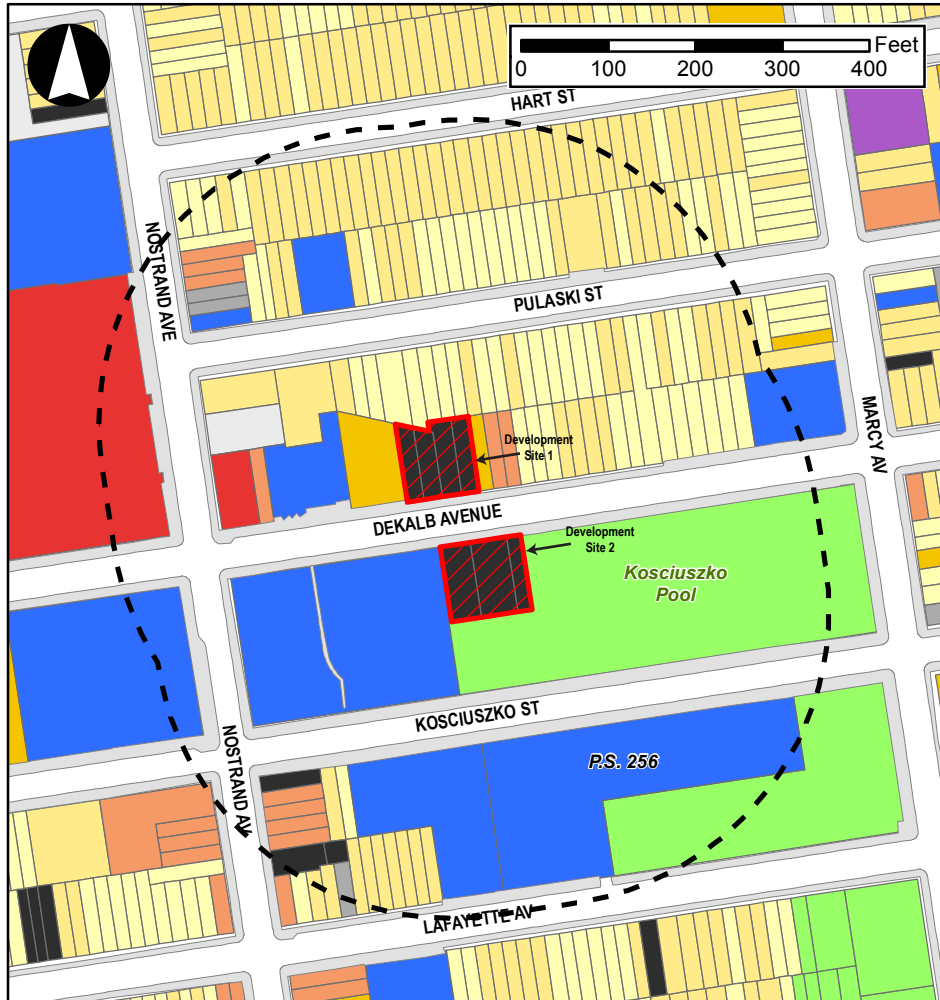
Predominant land uses within a 400-foot radius of Development Sites 1 and 2 primarily include residential uses, institutional, open space, and some commercial uses as well. The majority of residential buildings are multi-family walk-up buildings. The Kosciusko Pool is located directly to the east of Development Site 2. Medical offices and its associated parking lot is located directly to the east of Development Site 2. Banneker Playground is located approximately 400 feet south of these Development Sites. P.S. 256, located adjacent to Banneker Playground, is located 250 feet south of Development Sites 1 and 2. The Salvation Army Bedford Day Care Center is also located to the south of Development Sites 1 and 2, directly adjacent to P.S. 256. The Marcy branch of the Brooklyn Public Library is located on the same block as Development Site 1. Home Depot and CABS Nursing home are located to the west of Development Sites 1 and 2, across Nostrand Avenue. The Bedford-Nostrand station for the New York City Transit (NYCT) G subway line is located just outside the 400-foot radius of Development Sites 1 and 2 at the intersection of Nostrand and Lafayette Avenues.

There are several NYCT bus routes serving Development Sites 1 and 2 including the B38, B44, and B44-Select Bus Service (SBS).

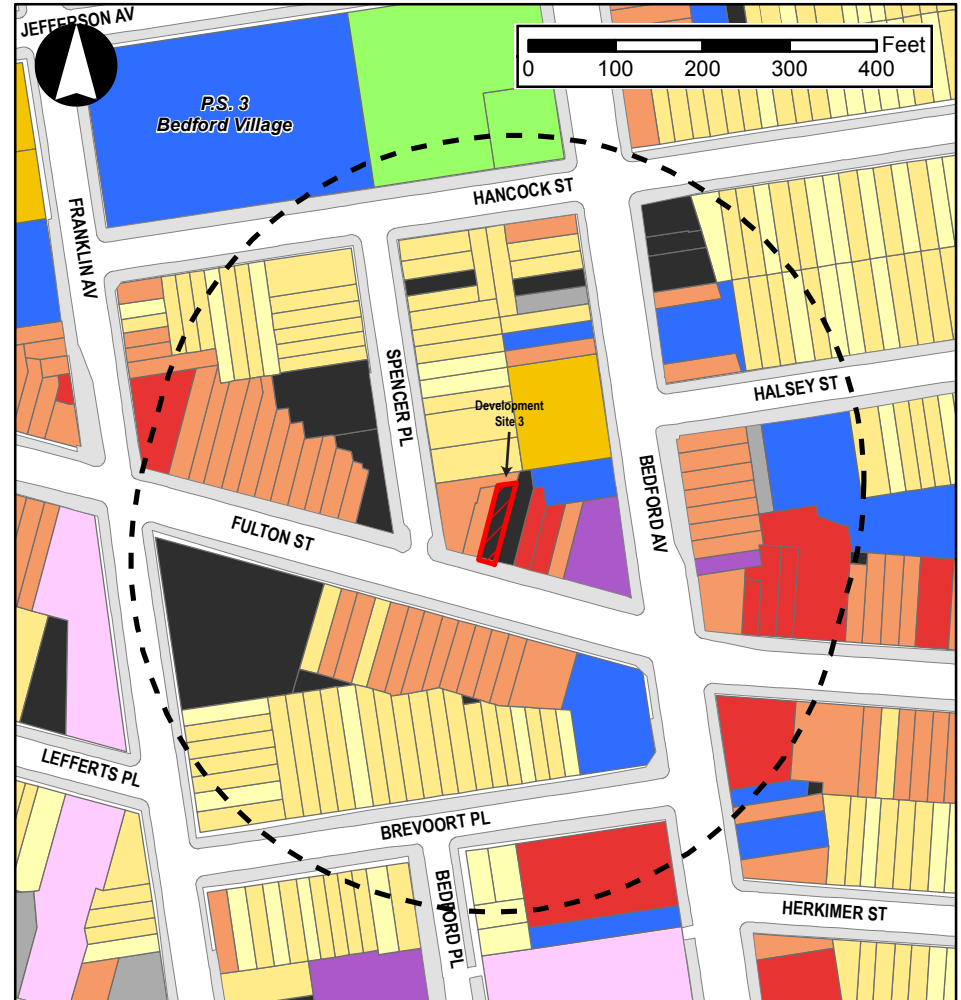
#### *Development Site 3*

Predominant land uses within a 400-foot radius of Development Site 3 primarily include residential uses, mixed commercial and residential uses, and some institutional and commercial uses as well as several vacant lots. The majority of residential buildings within the 400-foot radius are multi-family walk-up buildings some with ground floor retail, specifically along Fulton Street and Bedford Avenue. Institutional uses include several houses of worship as well as P.S. 3 located to the north of Development Site 3. The John Hancock Playground is located to the north of Development Site 3, adjacent to P.S. 3. The Co-Op School is located to the south of Development Site 3 at 40 Brevoort Place. The Franklin Avenue station for the NYCT C and S lines is located within the 400-foot radius of Development Site 3, at the intersection















633-639 & 648-654 DeKalb Avenue:



1187 Fulton Street:



**Legend**

-  400-Foot Radius
-  Development Sites
- Land Use**
-  One & Two Family Buildings
-  Multi-Family Walkup Buildings
-  Multi-Family Elevator Buildings
-  Mixed Commercial/Residential Buildings
-  Commercial/Office Buildings
-  Industrial/Manufacturing
-  Transportation/Utility
-  Public Facilities & Institutions
-  Open Space
-  Parking Facilities
-  Vacant Land
-  All Others or No Data

of Franklin Avenue and Fulton Street.

### **Zoning**

As shown in **Figure 3**, Development Sites 1 and 2 are zoned R6A and Development Site 3 is zoned R7D/C2-4. Each is described below.

#### *Development Sites 1 and 2*

Development Sites 1 and 2 are zoned R6A. R6A is a contextual residential district where the Quality Housing bulk regulations are mandatory. These regulations produce high lot coverage, six- or seven-story apartment buildings set at or near the street line. Designed to be compatible with older buildings found in medium-density neighborhoods, R6A districts are mapped in the Bronx, Brooklyn and Queens. Parts of Kingsbridge in the Bronx and Williamsburg in Brooklyn are typical R6A areas.

The floor area ratio (FAR) in R6A districts is 3.0. Above a maximum base height of 60 feet, the building must set back by at least 10 feet on a wide street and 15 feet on a narrow street before rising to its maximum height of 70 feet. To preserve the traditional streetscape, the street wall of a new building can be no closer to the street line than any building within 150 feet on the same block, but need not be farther than 15 feet. The area between a building's street wall and the street line must be planted. R6A buildings must have interior amenities for the residents pursuant to the Quality Housing Program Off-street parking, which is not allowed in front of a building, is required for 50% of a building's dwelling units, or can be waived if five or fewer spaces are required.

#### *Development Site 3*

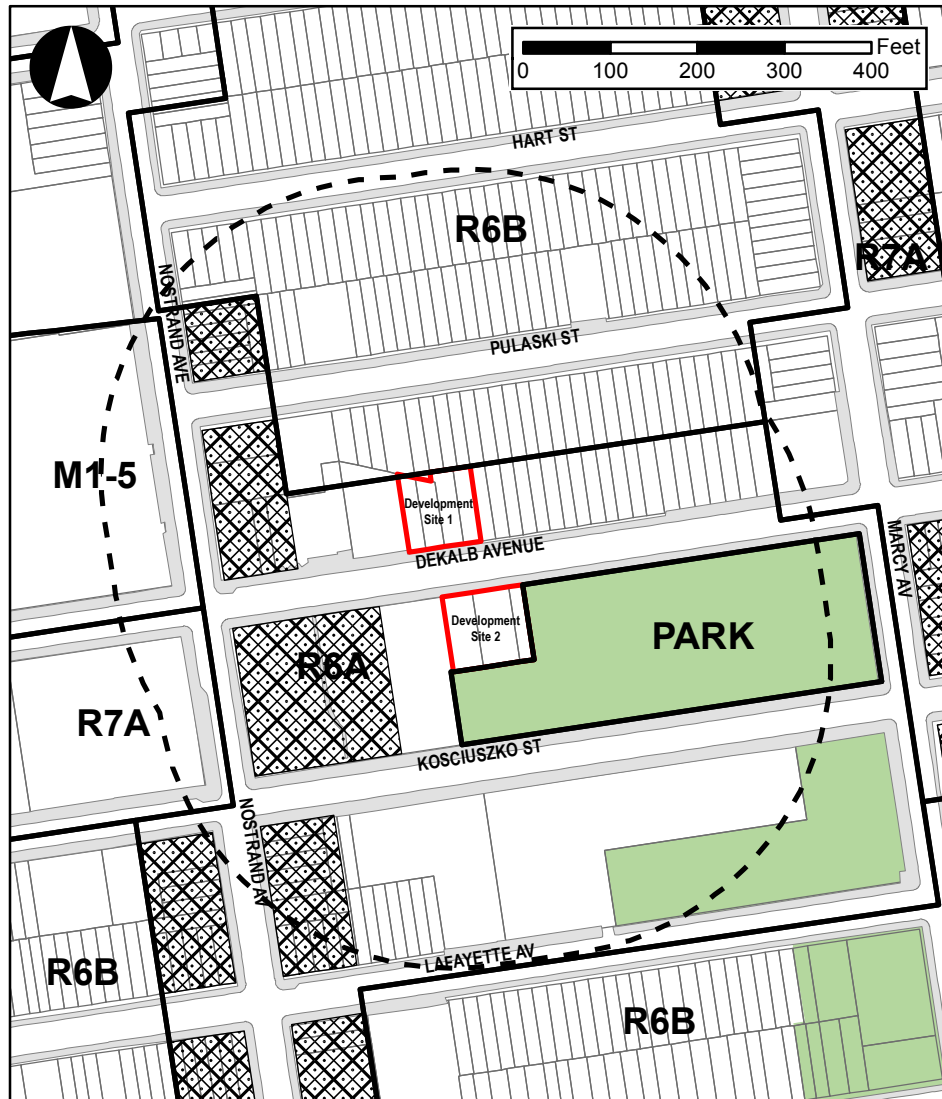
Development Site 3 is zoned R7D/C2-4. R7D residential districts promote new contextual development along transit corridors. The FAR of 4.2 allows greater residential density than R7A districts and less than R7X districts. In a C4-5D district or when a commercial overlay is mapped in an R7D district, the ground floor of a building must be reserved for retail uses, such as shops and services, to maintain the vitality of the street.

Quality Housing bulk regulations, mandatory in R7D districts, produce ten-story buildings set at or near the street line. The base height of a new building must be 60 to 85 feet before setback, rising to a maximum building height of 100 feet. In order to maintain the continuity of the street wall, a new building can be no closer to the street line than any other building within 150 feet on the same block but need not be farther than 15 feet. In commercial overlay districts or in a C4-5D district, the street wall of a building on a wide street must extend along the entire width of the zoning lot at the street line. Interior amenities for building residents pursuant to the Quality Housing Program are required. Off-street parking is required for 50 percent of dwelling units.

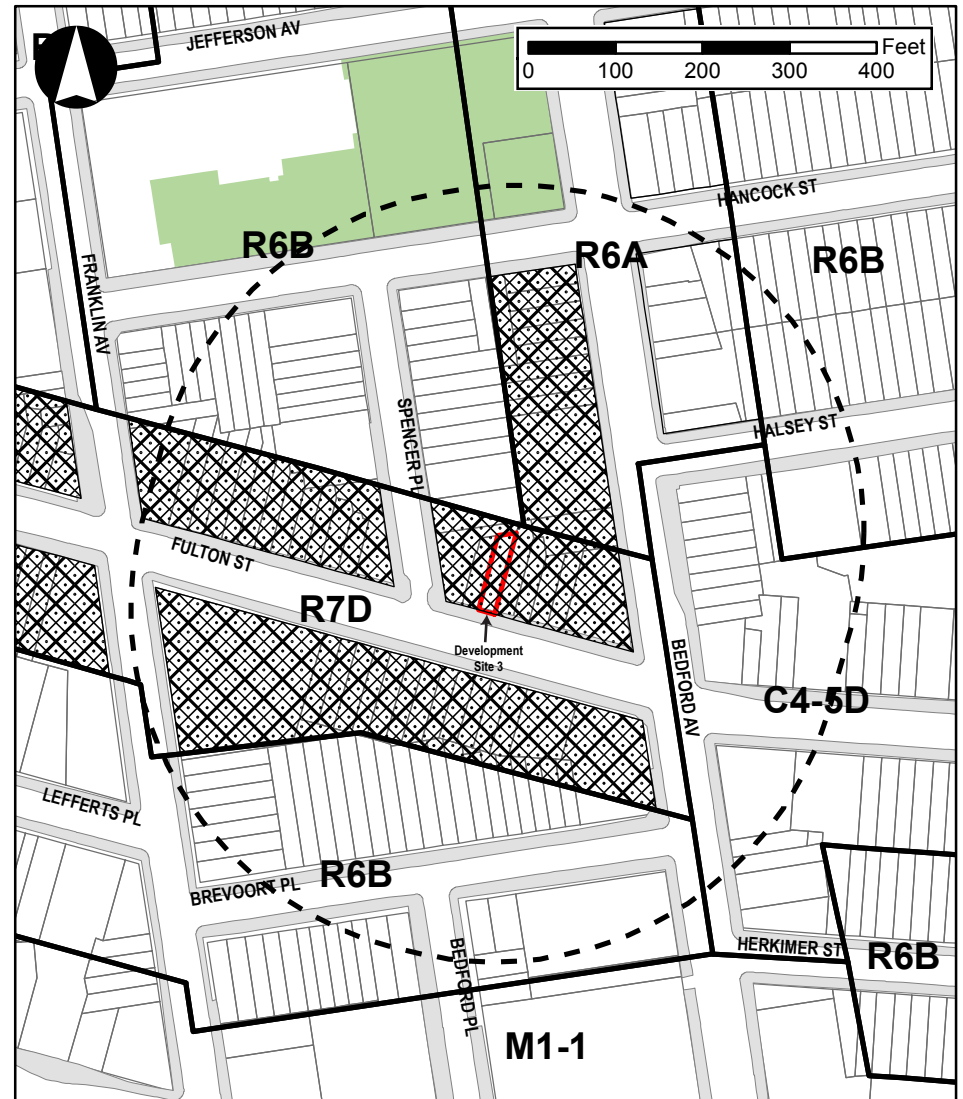
The C2-4 district is mapped as a commercial overlay within the R7D residential district. Mapped along streets that serve local retail needs, they are found extensively throughout the city's lower- and medium-density areas and occasionally in higher-density districts.

Typical retail uses include neighborhood grocery stores, restaurants and beauty parlors. C2 districts permit a slightly wider range of uses, such as funeral homes and repair services. In mixed buildings,

633-639 & 648-654 DeKalb Avenue:



1187 Fulton Street:



Legend

- 400-Foot Radius
- Zoning District Boundaries
- Open Space
- Development Sites
- C2-4 Commercial Overlay

commercial uses are limited to one or two floors and must always be located below the residential use. When mapped in R6 through R10 districts, the maximum commercial FAR is 2.0 for a C2-4 overlay.

## PURPOSE AND NEED FOR PROPOSED ACTIONS

The Proposed Project would create opportunities for new affordable housing development on vacant lots in an area where a strong demand for affordable housing exists. In addition, the Proposed Project would bring further redevelopment and improvement to the neighborhood.

## DESCRIPTION OF THE PROPOSED PROJECT

As noted above, the Proposed Actions include the disposition of City-owned property, designation of an Urban Development Action Area, and project approval of an Urban Development Action Area Project (UDAAP) to facilitate the development of new affordable housing in the Bedford-Stuyvesant neighborhood of Brooklyn. All eight lots are owned by HPD and would and would be conveyed to the Project Sponsor as a result of the Proposed Actions. The Proposed Actions would facilitate the development of 3 buildings containing approximately 84 dwelling units, plus one unit for the superintendent (total of approximately 85 dwelling units) and 2,512 gsf of retail space. The proposed development for each site is described in detail below and summarized in **Table 2**.

**Table 2: Proposed Project**

Block	Lot	Address	Proposed Height (including mechanical bulkhead/Solar Panels)	Residential GSF	Total DUs	Retail GSF	Total Proposed GSF
<b>Development Site 1</b>							
1774	74, 75, 76, 77	633-639 DeKalb Avenue	80'-9"	39,604	37	-	39,604
<b>Development Site 2</b>							
1779	22, 24, 26	648-654 DeKalb Avenue	80'-9"	44,769	45	-	44,769
<b>Development Site 3</b>							
2000	43	1187 Fulton Street	55'	4,576	3	2,512	7,088
<b>Total</b>				<b>88,949</b>	<b>85</b>	<b>2,512</b>	<b>91,461</b>

### *Development Site 1*

Development Site 1 will include a 7-story (69'-6" to roof; 80'-9" to mechanical bulkhead/solar panels) residential building located at 633-639 DeKalb Avenue (see **Figure 4**). The building at Development Site 1 would be approximately 39,604 gsf and include approximately 37 DUs. The rear yard of Development Site 1 will be approximately 3,650 sf and will include an outdoor seating area, children's play area, and planted areas.

### *Development Site 2*

Development Site 2 will include a 7-story (69'-6" to roof; 80'-9" to mechanical bulkhead/solar panels ) residential building located at 648-654 DeKalb Avenue would be approximately 44,769 gsf and include approximately 44 DUs, plus one DU for the superintendent (see **Figure 4**). The rear yard of Development Site 2 would be approximately 3,260 sf and will include an outdoor seating area, children's play area, and





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DeKalb Commons

Figure 4  
Proposed Development at Development Sites 1 & 2

planted areas. This building would also include an approximately 903 sf community room on the ground floor.

The buildings on Development Sites 1 and 2 would include solar panels on the roof.

### *Development Site 3*

Development Site 3 will include one 4-story (45' to roof; 55' to mechanical) residential/retail building located 1187 Fulton Street (see **Figure 5**). The building proposed at 1187 Fulton Street would be approximately 7,088 gsf and would include approximately 3 DUs and 2,512 gsf of commercial retail space on the ground floor.

The Proposed Project would be completed and occupied in early 2023.

### **MEASURES TO BE INCORPORATED INTO THE PROPOSED PROJECT**

As described in further detail in the EAS dated May 23, 2019, the following measures will ensure that no significant adverse impacts related to hazardous materials and noise would result from the Proposed Actions. These measures would be incorporated into the design, construction, and/or operation of the Proposed Project and since the Project Area is currently City-owned, HPD would require the Project Sponsor implement these measures to the satisfaction of the City through the Land Disposition Agreement (LDA) between HPD and the Project Sponsor.

Due to the potential presence of hazardous materials at the Project Area, the LDA between HPD and the Project Sponsor would require that Phase II testing be performed for Development Site 1 (633-639 DeKalb Avenue) & Development Site 2 (648-654 DeKalb Avenue), including the NYC Department of Environmental Protection (DEP) review and approval of a workplan/Health and Safety Plan (HASp) prior to such testing. In addition, if remediation is warranted for one or more parcels/phases, a Remedial Action Plan (RAP) and associated Construction Health and Safety Plan (CHASP), subject to review and approval by HPD and DEP, would also be required. Finally, at the conclusion of construction and prior to occupancy of the new buildings, a Professional Engineer (P.E.)-certified Closure Report must be reviewed and approved by HPD and DEP to ensure the required remedial measures were implemented and the new buildings are suitable for occupancy.

The *CEQR Technical Manual* has set noise attenuation standards for buildings that are based on exterior noise levels. These values are designed to maintain interior noise levels of 45 dBA or lower for residential or community facility uses, and 50 dBA or lower for commercial uses. HUD also sets exterior noise standards for housing construction based on exterior noise standards. The maximum predicted L<sub>10</sub> noise level is expected to be 73.0 dBA along the southern facade and 78.0 dBA along the eastern facade of the proposed building at 648-650 DeKalb Avenue. To ensure acceptable interior noise levels at Development Site 2, a minimum of 28 dBA of attenuation is needed along the proposed building's southern facade and a minimum of 35 dBA of attenuation is needed along the proposed building's eastern facade. The noise attenuation specifications for Development Site 2 at 648-654 DeKalb Avenue would be mandated through the provisions contained in the LDA between HPD and the Project Sponsor. With implementation of the noise attenuation levels outlined above, the Proposed Project would provide sufficient attenuation to achieve the *CEQR Technical Manual* interior noise level guidelines of 45 dBA L<sub>10</sub> for residential uses. Therefore, the Proposed Project would not result in any significant adverse noise impacts related to building noise attenuation requirements.



*For Illustrative Purposes Only*

## **D. ANALYSIS FRAMEWORK FOR ENVIRONMENTAL REVIEW**

In order to assess the potential effects of the Proposed Project, the “Future without the Proposed Actions (No-Action condition)” and “Future with the Proposed Actions (With-Action condition)” are analyzed for an analysis year, or “Build Year” of 2023. The future With-Action condition identifies the amount, type, and location of development that is expected to occur by 2023 as a result of the Proposed Actions. The future No-Action condition identifies similar development projections for 2023 absent the Proposed Actions. The incremental difference between the With-Action and No-Action conditions serves as the basis for impact analyses.

### **Future without the Proposed Actions (No-Action Condition)**

In the 2023 future without the Proposed Actions, it is expected that there would be no new development on the Development Sites and all eight lots would remain vacant.

### **Future with the Proposed Actions (With-Action Condition)**

As discussed above under “The Proposed Actions”, the Proposed Actions would facilitate the development of three buildings that would include a total of approximately 84 affordable DUs, plus one DU for the superintendent, and approximately 2,512 gsf of commercial retail. The Proposed Project is expected to take approximately 22 months to construct, and would be completed and fully occupied in 2023. The net increment of approximately 85 dwelling units and approximately 2,512 gsf of commercial retail will represent the basis for environmental analyses in EIS.

## **E. PROPOSED SCOPE OF WORK FOR THE ENVIRONMENTAL IMPACT STATEMENT (EIS)**

As the RWCDs associated with the Proposed Actions would affect various areas of environmental concern and was found to have the potential for significant adverse impacts pursuant to the EAS and Positive Declaration, an Environmental Impact Statement (EIS) pursuant to CEQR will be prepared for the Proposed Actions in conformance with all applicable laws and regulations, including 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 of Procedure for CEQR, found at Title 62, Chapter 5 of the Rules of the City of New York. The EIS will be targeted to the analysis of the Proposed Project for technical areas of concern, including: Shadows and Public Health. The remaining CEQR impact categories have undergone analysis as part of an EAS for the Proposed Actions. The EAS prepared for the Proposed Actions contains analyses that conclude there is no potential for significant adverse impacts in the following areas: Land Use, Zoning, and Public Policy; Socioeconomic Conditions; Community Facilities; Open Space; Historic and Cultural Resources; Urban Design and Visual Resources; Hazardous Materials; Natural Resources; Water and Sewer Infrastructure; Solid Waste and Sanitation Services; Transportation, Air Quality; Energy; Greenhouse Gases and Climate Change; Neighborhood Character; and Construction Impacts.

As described above, measures would be incorporated as part of design, construction, and/or operation of the Proposed Project to ensure that no significant adverse impacts related to Hazardous Materials and Noise would result from the Proposed Actions. These include construction in accordance with a New York City Department of Environmental Protection (DEP)-approved Remedial Action Plan (RAP) and Construction Health and Safety Plan (CHASP) to address hazardous materials contamination and adequate window-wall attenuation to address ambient noise. HPD would require the Project Sponsor to implement

these measures as part of the project to the satisfaction of the City through the Land Disposition Agreement (LDA) between HPD and the Project Sponsor. These measures are described in further detail in the EAS. The EAS prepared for the Proposed Actions will be included as an Appendix of the EIS. Consequently, these environmental categories will not be assessed in the EIS.

The EIS will follow the guidance of the *CEQR Technical Manual*, and will contain:

- A description of the Proposed Actions, Proposed Project, and the Project Area's environmental setting;
- A statement of the environmental impacts of the Proposed Actions, including its short-and long-term effects and typical associated environmental effects;
- An identification of any significant adverse environmental effects that cannot be avoided if the Proposed Actions are implemented;
- A discussion of reasonable alternatives to the Proposed Actions;
- An identification of irreversible and irretrievable commitments of resources that would be involved in the Proposed Actions should they be implemented; and
- A description of mitigation measures proposed to eliminate or minimize any significant adverse environmental impacts.

Each chapter of the EIS that requires a detailed analysis will include an analysis of the future With-Action condition compared to the future No-Action condition, as set forth in the *CEQR Technical Manual*. The technical analyses of the EIS will examine the potential impacts related to the completion of the Proposed Actions by the 2023 Build Year. HPD, as lead agency, will coordinate the environmental review of the Proposed Actions among the involved and interested agencies and the public.

## **TASK 1. PROJECT DESCRIPTION**

The first chapter of the EIS introduces the reader to the discretionary actions required to facilitate the Proposed Project, and sets the context in which to assess impacts. The chapter contains a description of the Proposed Actions; Proposed Project; Project Area (including background and/or history); a statement of the purpose and need for the Proposed Actions; key planning considerations that have shaped the current proposal; a detailed description of any project-related improvements; and discussion of the approvals required, procedures to be followed, and the role of the EIS in the process.

This chapter is the key to understanding the Proposed Project and its impact, and gives the public and decision-makers a base from which to evaluate the Proposed Project against the future without the project. The section on approval procedures will explain the ULURP process, its timing, and hearings before the Community Board, the Brooklyn Borough President's office, the CPC, and the New York City Council. The role of the EIS as a full-disclosure document to aid in decision-making will be identified and its relationship to ULURP and the public hearings described.

## TASK 2. SHADOWS

A shadows analysis assesses whether new structures resulting from a proposed action would cast shadows on sunlight sensitive publicly accessible resources or other resources of concern, such as natural resources, and to assess the significance of their impact. This chapter will examine the Proposed Actions' potential for significant and adverse shadow impacts pursuant to *CEQR Technical Manual* criteria. Generally, the potential for shadow impacts exists if an action 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. New construction or building additions resulting in incremental height changes of less than 50 feet can also potentially result in shadow impacts if they are located adjacent to, or across the street from, a sunlight-sensitive resource.

The Proposed Actions would result in development of buildings greater than 50 feet in height and therefore has the potential to result in shadow impacts. The EIS will assess the Proposed Project for potential shadowing effects on sunlight-sensitive uses and disclose the range of shadow impacts, if any, which are likely to result from the Proposed Actions. The shadows analysis in the EIS will include the following subtasks:

- A preliminary shadows screening assessment will be prepared to ascertain whether shadows may potentially reach any sunlight-sensitive resources at any time of year.
  - A Tier 1 Screening Assessment will be conducted to determine the longest shadow study area for the projected and potential developments, which is defined as 4.3 times the height of a structure (the longest shadow that would occur on December 21, the winter solstice), pursuant to the *CEQR Technical Manual*.
  - 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 triangular area that cannot be shaded by the Proposed Project, which in New York City is the area that lies between -108 and +108 degrees from true north.
  - If any portion of a sunlight-sensitive resource is within the area that could be potentially shaded by the Proposed Project, a Tier 3 Screening Assessment will be conducted. The Tier 3 Screening Assessment will determine if shadows resulting from the Proposed Project can reach a sunlight-sensitive resource through the use of three-dimensional computer modeling software with the capacity to accurately calculate shadow patterns. The model will include a three-dimensional representation of the sunlight-sensitive resource(s), a three-dimensional representation of the Proposed Project, and a three-dimensional representation of the topographical information within the area to determine the extent and duration of new shadows that would be cast on sunlight-sensitive resources as a result of the Proposed Actions.
- If the screening analysis does not rule out the possibility that action-generated shadows would reach any sunlight-sensitive resources, a detailed analysis of potential shadow impacts on publicly-accessible open spaces or sunlight-sensitive historic resources resulting from the Proposed Project will be provided in the EIS. The detailed shadow analysis will establish a baseline condition (No-Action), which will be compared to the future condition resulting from the Proposed Actions (With-Action) to illustrate the shadows cast by existing or future buildings and distinguish the additional (incremental) shadow cast by the Proposed Project. The detailed analysis will include the following tasks:

- The analysis will be documented with graphics comparing shadows resulting from the No-Action condition with shadows resulting from the Proposed Actions, with incremental shadow highlighted 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 will be provided. The significance of any shadow impacts on sunlight-sensitive resources will be assessed by preparing an analysis for the resources of concern. Section 411 of the *CEQR Technical Manual* states a site plan and inventory of the features that constitute the open space or natural resource as well as a survey detailing existing conditions, quality, and levels of use of the open space are needed to determine the significance of the shadow cast in the future With-Action.

### **TASK 3. MITIGATION**

Where significant adverse project impacts have been identified in any of the above tasks, measures to mitigate those impacts will be described. These measures will be developed and coordinated with the responsible City/State agencies as necessary. Where impacts cannot be mitigated, they will be described as unmitigated and unavoidable adverse impacts.

### **TASK 4. ALTERNATIVES**

The purpose of an alternatives analysis in an EIS is to examine reasonable and practical options that avoid or reduce project-related significant adverse impacts while achieving the goals and objectives of the Proposed Project. The alternatives are usually defined once the full extent of the Proposed Project's impacts has been identified, however, they will include the No-Action Alternative, as required by SEQRA, and a No Significant Adverse Impacts Alternative. The alternatives analysis is primarily qualitative, except where significant adverse impacts of the Proposed Project have been identified. The level of analysis depends on an assessment of project impacts determined by the analysis connected with the appropriate tasks.

### **TASK 5. SUMMARY EIS CHAPTERS**

In accordance with CEQR guidelines, the EIS will include the following three summary chapters, where appropriate to the Proposed Project:

- **Unavoidable Adverse Impacts** - which summarizes any significant adverse impacts that are unavoidable if the Proposed Project is implemented regardless of the mitigation employed (or if mitigation is not feasible).
- **Growth-Inducing Aspects** of the Proposed Project - which generally refer to "secondary" impacts of a proposed project that trigger further development.
- **Irreversible and Irretrievable Commitments of Resources** - which summarizes the Proposed Project and its impacts in terms of the loss of environmental resources (loss of vegetation, use of fossil fuels and materials for construction, etc.), both in the immediate future and in the long term.

**TASK 6. EXECUTIVE SUMMARY**

The executive summary will utilize relevant material from the body of the EIS to describe the proposed project, the necessary approvals, study areas, environmental impacts predicted to occur, measures to mitigate those impacts, unmitigated and unavoidable impacts (if any), and alternatives to the proposed project. The executive summary will be written in sufficient detail to facilitate drafting of a Notice of Completion for the EIS by the lead agency.