A. INTRODUCTION

As described in the 2014 *City Environmental Quality Review (CEQR) Technical Manual*, alternatives selected for consideration in an environmental impact statement are generally those that are feasible and have the potential to reduce, eliminate, or avoid adverse impacts of a proposed project while meeting some or all of the goals and objectives of the project. As described in Chapter 1, "Project Description," the proposed action consists of discretionary actions intended to facilitate a mixed-use development on two blocks in southeastern Williamsburg in Brooklyn Community District 1. The reasonable worst-case development scenario (RWCDS) for the proposed action includes a development program consisting of 1,147 dwelling units (DUs), of which 344 would be affordable housing units, 64,807 gross square feet (gsf) of local retail, 427 required accessory parking spaces, and a 26,000-sf publicly-accessible open space. The open space would be a required element pursuant to a legal instrument such as Restrictive Declaration (RD) recorded against the property.

This chapter considers the following alternatives to the proposed action:

- A No-Action Alternative, which is mandated by CEQR and the State Environmental Quality Review Act (SEQRA) and is intended to provide the lead and involved agencies with an assessment of the expected environmental impacts of no action on their part.

- A Lesser Density Alternative, which would reduce the development density permitted in the project area, by rezoning the project area to R7A with a C2-4 commercial overlay covering the entirety of both blocks. As with the proposed action and consistent with City policy, a zoning text amendment would designate the project area as a Mandatory Inclusionary Housing Area (MIHA).

- A No Significant Adverse Schools Impacts Alternative, which would eliminate the significant adverse schools impacts by reducing the number of residential units.

B. PRINCIPAL CONCLUSIONS

No-Action Alternative

The No-Action Alternative examines future project site conditions, but assumes the absence of the proposed action (i.e., none of the discretionary approvals proposed as part of the proposed action would be adopted). Under the No-Action Alternative, the project area's existing M3-1 zoning would remain and it is anticipated that the project area would be unoccupied and there would continue to be no buildings in the area. The technical chapters of this EIS have also described the No-Action Alternative as "the Future Without the Proposed Action."

The significant adverse impacts anticipated for the proposed action would not occur under the No-Action Alternative. However, the No-Action Alternative would not meet the goals of the proposed action. The benefits expected to result from the proposed action—including facilitating a mixed-use, mixed-income development which would include a publicly-accessible open space on a two-block area currently only used for temporary short-term activities—would not be realized under this alternative, and therefore the No-Action Alternative would fall short of the objectives of the proposed action and, unlike the proposed action, would not contribute to the City's goal of increasing the supply of affordable housing.

Lesser Density Alternative

A Lesser Density Alternative to the proposed action was developed to determine whether development of the project area with a lower density would eliminate or reduce any of the significant adverse impacts identified under the proposed action. Under the Lesser Density Alternative, the project area would be rezoned R7A, with a C2-4 commercial overlay mapped across the entire area and, as with the proposed action, the rezoning area would be designated as a MIHA. With this zoning designation, it is projected that the project area would be redeveloped with 1,036,552 gsf, consisting of residential, retail, and accessory parking space, the same mix of buildings uses anticipated under the proposed action. The development program would include 862 DUs, of which 259 DUs would be affordable housing units, 64,807 gsf of local retail, and 365 required accessory parking spaces. The development would be built to the maximum permitted floor area ratio (FAR) of 4.6 and building heights would reach the maximum permitted height of 95 feet. Compared to the proposed action, the Lesser Density Alternative would have 25 percent fewer residential units, with 85 fewer affordable housing DUs and 285 fewer DUs overall, and 15 percent fewer required accessory parking spaces, with 62 fewer spaces. The amount of retail space under the Lesser Density Alternative is projected to be the same as the proposed action. However, unlike the proposed action, under the Lesser Density Alternative the development would not include a 26,000-sf midblock publicly-accessible open space.

Conditions with the Lesser Density Alternative, as compared to the probable impacts of the proposed action, are summarized below. As under the proposed action, the Lesser Density Alternative would not result in significant adverse impacts in the areas of land use, zoning, and public policy; socioeconomic conditions; community facilities and services (high schools, health care, publicly-funded day care, libraries, and fire and police protection services); open space; shadows; urban design and visual resources; natural resources; hazardous materials; water and sewer infrastructure; energy; transportation (parking, transit, and pedestrians); air quality; greenhouse gas emissions and climate change; noise; public health; neighborhood character; and construction. Also as under the proposed action, the Lesser Density Alternative would result in significant adverse impacts related transportation (traffic). As under the proposed action, all of the significant adverse impacts under the Lesser Density Alternative would be mitigable. Unlike the proposed action, the Lesser Density Alternative would not result in a significant adverse intermediate school impact. ~~However,~~ In the Applicant's opinion, the Lesser Density Alternative would be less successful at accomplishing the proposed action's goals of providing new housing, would not include a publicly-accessible open space, and would not create as much as affordable housing that would advance the City's Housing New York plan.

No Significant Adverse Schools Impacts Alternative

Under the proposed action, intermediate schools in the study area would operate at 142.0 percent of capacity, approximately 6.2 percentage points higher than under No-Action. As such, the proposed action would result in an over utilization of intermediate school facilities and a 5 percentage point or greater increase in the utilization rate over No-Action conditions. The proposed action would not result in significant adverse impacts on elementary and high schools or other type of community facilities and services considered under CEQR.

The purpose of the No Significant Adverse Schools Impacts Alternative is to determine if there is a practicable alternative to the proposed action that could eliminate the intermediate schools impacts by reducing the number of residential units developed in the project area.

To eliminate the intermediate school impact, the number of residential units would have to be reduced by approximately 19.8 percent from 1,147 DUs to 920 DUs. A development of this size would generate 110 intermediate school students, based on rates provided for Brooklyn in the *CEQR Technical Manual*, as compared to 138 intermediate school students generated by the proposed action. With this reduction, intermediate schools in the study area would operate at 140.8 percent of capacity, approximately 4.9 percentage points higher than under No-Action. As such, under this alternative the increase in school utilization of intermediate schools would be below the 5-percent increase impact threshold and therefore the proposed action's significant adverse schools impact would be eliminated.

The reduction in density required for this alternative would be similar, but of a slightly lesser magnitude than that of the Lesser Density Alternative described above, which would include 862 DUs. If, like the proposed action and the Lesser Density Alternative, the No Significant Adverse Schools Impacts would also include 64,807 gsf of local retail, then it would have a built FAR of approximately 4.88, which is 6 percent higher than the 4.6 FAR permitted for R7A (MIHA) districts considered in the Lesser Density Alternative and 19 percent lower than the weighted average 6.0 FAR permitted for the proposed action. As with the Lesser Density Alternative, the No Significant Adverse Schools Impacts Alternative would not include the 26,000-sf publicly-accessible open space that would be part of the proposed action. This alternative may be feasible, however, similar to the Lesser Density Alternative, in the Applicant's opinion, it would not provide the same level of benefits as the proposed project as it would result in fewer affordable housing units and would not provide a 26,000-sf publicly-accessible open space in a growing residential area with relatively low open space ratios.

With 920 DUs, the No Significant Adverse Schools Impacts Alternative would generate a residential population of 3,266 residents, slightly higher than the 3,060 residents generated by the 862-DU Lesser Density Alternative but lower than the 4,072 residents generated by the 1,147-DU proposed action. Given its size relative to the Lesser Density Alternative, the environmental effects of the No Significant Adverse Schools Impacts Alternative would be generally similar to the Lesser Density Alternative, outlined above, with significant adverse impacts anticipated for traffic and no significant adverse impacts anticipated for other technical areas.

C. NO-ACTION ALTERNATIVE

The No-Action Alternative assumes that the project area is not redeveloped with the reasonable worst-case development scenario (RWCDS) or the Applicant's similar proposed development project. There would be no zoning map or text amendments approved for the project area. Conditions under this alternative are similar to the "Future Without the Proposed Action (No-Action)" described in the preceding chapters, which are compared in the following sections to conditions in the "Future With the Proposed Action (With-Action)."

Under the No-Action Alternative, it is anticipated that there would continue to be no buildings in the project area and that the properties would be unoccupied.

The effects of the No-Action Alternative in comparison to those of the proposed action are outlined below. Overall, the No-Action Alternative would not result in any significant adverse impacts, but likewise it would not provide any of the benefits associated with the proposed action, which include increasing the supply of affordable housing, the creation of a new publicly-accessible open space, and activating a two vacant blocks in a redeveloping neighborhood.

Land Use, Zoning, and Public Policy

Neither the No-Action Alternative nor the proposed action would result in significant adverse impacts on land use, zoning, and public policy.

In the No-Action Alternative, the site would remained zoned M3-1, it would continue to have no buildings, and it would be unoccupied. Although in recent years and at present it has been used for temporary vehicle/equipment storage activity under short-term rentals and such uses would be permitted under No-Action conditions, for conservative analysis it is projected that the project area would be unoccupied.

In comparison to the future with the proposed action, under the No-Action Alternative there would be no market rate and affordable housing, local retail, and publicly-accessible open space provided in the project area. The No-Action Alternative conditions would be less appropriate for the project area than the land uses under the proposed action. As described in Chapter 2, "Land Use, Zoning, and Public Policy," the area surrounding the project area is well-served by transit and has been redeveloping with new residential development and locally-oriented community facility uses and this trend is anticipated to continue in the future without the proposed action.

The project area's existing M3-1 zoning designation, reflecting past conditions and no longer appropriate for a redeveloping residential community where there is little demonstrated demand for the construction of new heavy industrial space, would remain in the No-Action Alternative. This existing zoning designation does not reflect current development trends in the area and prohibits the project area from including residential uses or becoming better integrated into the surrounding residential communities.

Socioeconomic Conditions

Neither the No-Action Alternative nor the proposed action would be expected to have a significant adverse impact on socioeconomic conditions.

Similar to the proposed action, the No-Action Alternative would not result in direct residential or business/institutional displacement. New residential developments are anticipated in the socioeconomic conditions study area in both the future with the proposed action and under the No-Action Alternative, which are expected to continue the trend of increasing rents in the study area; unlike the proposed action, under the No-Action Alternative, the project area would not be designated a MIHA, and no affordable housing would be constructed there. As a result, the benefits of the proposed action, which include bringing new affordable housing to the area that would help maintain affordability in the area's housing stock, would not be realized under the No-Action Alternative.

Community Facilities and Services

Unlike the proposed action, the No-Action Alternative would not introduce residents to the study area and, therefore, would not result in an increase in demand on area community facilities. The No-Action Alternative would avoid the significant adverse intermediate schools impact that would occur as a result of the proposed action.

Open Space

Neither the No-Action Alternative nor the proposed action would result in significant adverse impacts on open space resources.

Under the No-Action Alternative the residential (half-mile) study area would have slightly lower ratios of population to public open space than existing conditions, due to study area population growth. However, given that that the project area would be unoccupied, it would not contribute to increases in population that would further lower the area's open space ratio. On the other hand, unlike the proposed action, under the No-Action Alternative a new 26,000-sf publicly accessible open space, which would increase the study area's supply of public open space under the proposed action, would not be added to the project area.

Shadows

Neither the No-Action Alternative nor the proposed action would result in significant adverse shadows impacts.

Unlike the proposed action, under the No-Action Alternative, no building would be constructed in the project area and as such there would be no shadows cast from the project area.

Historic and Cultural Resources

Neither the No-Action Alternative nor the proposed action would result in significant adverse impacts on historic and cultural resources.

There are no historic architectural resources or archaeological resources in the project area. In addition, there are no historic architectural resources in the vicinity. As such, neither the No-Action Alternative nor the proposed action would have the potential to affect any historic or cultural resources.

Urban Design and Visual Resources

Neither the No-Action Alternative nor the proposed action would result in significant adverse impacts on urban design and visual resources.

Under the No-Action Alternative, however, urban design improvements to the project area that would occur with the proposed action, including the midblock publicly-accessible open space corridor, would not be implemented. As such, the pedestrian connections between the project area and adjoining streets would be not be provided. Furthermore, the visual benefits provided by buildings developed pursuant to contextual zoning that would offer a more unified urban design character would remain unrealized.

Hazardous Materials

Neither the No-Action Alternative nor the proposed action would result in significant adverse hazardous materials impacts.

Under the No-Action Alternative, there would be no new buildings constructed in the project area and as such there would be no possible exposure risks such as may occur with new excavation. The Southern Block, which has undergone past environmental remediation activities, will continue to be subject to a Voluntary Cleanup Agreement and related requirements that allow the block "to be used for industrial, commercial, and/or recreational (designed to preclude contact with contaminants by humans) purposes" while other uses are prohibited without the express written permission or waiver of such prohibition by the New York State Department of Environmental Conservation.

Water and Sewer Infrastructure

Neither the No-Action Alternative nor the proposed action would result in significant adverse water and sewer infrastructure impacts.

Compared with the proposed action, the No-Action Alternative would not generate demand on the City's water supply and wastewater treatment infrastructure, though the Southern Block would remain paved and the Northern Block would remain partly paved. Unlike the proposed action, which would be required to reduce the stormwater release rate into the City's combined sewer system as part of the site connection approval process, under the No-Action Alternative there

would be no requirements for stormwater management measures to reduce the stormwater release rate.

Energy

Neither the No-Action Alternative nor the proposed action would result in significant adverse energy impacts.

As there would be no buildings on the project area and it would remain unoccupied under RWCDS conditions, there would be negligible energy demand generated by the project area under the No-Action Alternative.

Transportation

Unlike the proposed action, which would result in significant adverse traffic impacts, the No-Action Alternative would not result in any significant adverse transportation impacts.

By the 2019 Build year, transportation demand is expected to increase due to new developments in the surrounding area and general background growth. As a result there would be some changes in level of service operating conditions in the future without the proposed action (refer to "Future Without the Proposed action in Chapter 12, "Transportation," for details). However, as the project area would be unoccupied and there would be no buildings in the project area under the No-Action Alternative, the project area would not generate any travel demand.

Air Quality

Neither the No-Action Alternative nor the proposed action would result in significant adverse air quality impacts.

As the project area would be unoccupied and there would be no buildings in the project area under the No-Action Alternative, the project area would not generate any air pollutant emissions and it would not be a sensitive receptor for emissions from other sources.

Greenhouse Gas Emissions and Climate Change

Neither the No-Action Alternative nor the proposed action would result in significant adverse greenhouse gas emissions and climate change impacts.

The project area would be unoccupied and there would be no buildings in the project area under the No-Action Alternative. As such, the project area would not be a source of greenhouse gas emissions and would not be expected to contribute substantially to climate change.

Noise

Neither the No-Action Alternative nor the proposed action would result in significant adverse noise impacts.

As the project area would be unoccupied and there would be no buildings in the project area under the No-Action Alternative, the project area would not generate any noise and it would not be a sensitive receptor for noise from other sources.

Public Health

As the No-Action Alternative would not result in an unmitigated significant adverse impact in the areas of air quality, noise, water quality, hazardous materials, or construction, no significant adverse impacts on public health would result.

Neighborhood Character

Neither the No-Action Alternative nor the proposed action would result in significant adverse impacts on neighborhood character.

The residential, including affordable housing, local retail, and publicly-accessible open space uses facilitated by the proposed action would not be developed in the No-Action Alternative. As such, the benefits on neighborhood character that would accrue from redeveloping two vacant blocks in a redeveloping area, which the proposed action would provide, would not be realized under the No-Action Alternative.

Construction

Neither the No-Action Alternative nor the proposed action would result in significant adverse construction impacts.

In the No-Action Alternative, no new construction would occur in the project area.

D. LESSER DENSITY ALTERNATIVE

A Lesser Density Alternative to the proposed action was developed to determine whether development of the project area with a lesser density would eliminate or reduce any of the significant adverse impacts identified under the proposed action Specifically, the Lesser Density Alternative considers an alternate zoning map amendment to that which is proposed under the proposed action. Under the Lesser Density Alternative, the entire project area would be rezoned R7A and, a C2-4 commercial overlay would be mapped over the entire project area (unlike the proposed action which would map the overlay on most though not all of the project area). As with the proposed action and consistent with City policy, the Lesser Density Alternative would include a zoning text amendment designating the project area as a MIHA.

As presented in Table 20-1, under the Lesser Density Alternative, the project area would be redeveloped with 1,036,552 gsf, comprising a mix of residential and local retail use, though with reduced residential units and without a publicly-accessible open space. In comparison to the proposed action, the Lesser Density Alternative would include 862 total DUs, of which 259 would be affordable housing units, which would result in 285 fewer total units and 85 fewer affordable housing units as compared to the proposed action. As with the proposed action, it is projected that under Lesser Density Alternative 30 percent of units would be affordable housing units under the MIH program Option 2, however if Option 1 was selected instead, then 25 percent of the units, approximately 216 DUs, would be affordable housing units at deeper levels of affordability. (Refer to Chapter 2 for a description of MIH options.) The amount of retail space is conservatively projected to be the same for the Lesser Density Alternative as for the proposed action.

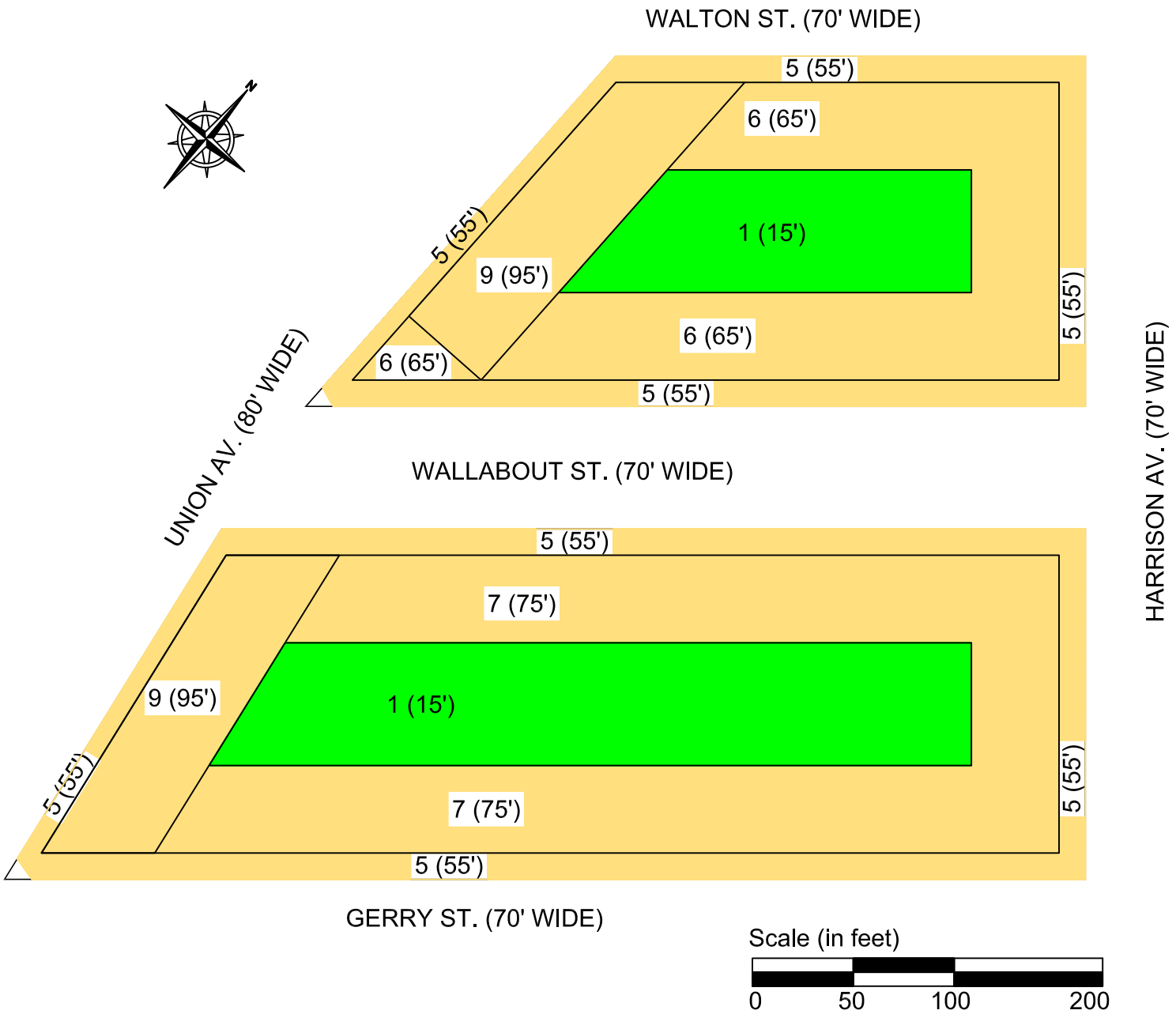
Table 20-1, Comparison of the Lesser Density Alternative and the Proposed Action

Use	Lesser Density Alternative	Proposed Action (RWCDS)	Differential
Residential Units (total)	862	1,147	-285
Residential Area (gsf) (excluding required accessory parking)	862,245	1,147,378	***-285,133***
Affordable Units	259	344	-85
Market Rate Units	603	803	-200
Publicly-Accessible Open Space (sf)	0	26,000	-26,000
Local Retail (gsf) (excluding required accessory parking)	64,807	64,807	No change
Required Accessory Parking Spaces	365	427	-62
Total Development (Gross Building Area)	***1,036,552***	***1,340,314***	***-303,762***

With this development program, the Lesser Density Alternative would have a population of 3,060 residents, as compared to 4,072 with the proposed action. The number of retail employees, 194, would be the same as the proposed action, while the number of residential building employees would be 34, as compared to 46 with the proposed action.

Although there is not a specific design for the Lesser Density Alternative, buildings would be required to provide streetwalls of 40 to 75 feet and would be permitted maximum heights of 95 feet with qualifying ground floors, which are assumed for analysis purposes. It is assumed for analysis purposes that an all R7A development on the project area would provide continuous streetwalls along all street frontages rising to a height of 55 feet (5 stories), with roof heights above the setback ranging up to 95 feet (9 stories) in a massing that would utilize the maximum permitted floor area, as shown in Figure 20-1, Lesser Density Alternative Illustrative Roof Plan.

Compared to the proposed action, while under the Lesser Density Alternative, building streetwalls and total heights along the Harrison Avenue corridor would be similar to the proposed action, the buildings would be shorter in the midblock areas, except that there would not be a midblock open space corridor, and along the Union Avenue corridor with the Lesser Density Alternative as compared to the proposed action.



Pfizer Sites Rezoning EIS

Figure 20-1

Lesser Density Alternative Illustrative Roof Plan

Conditions with the Lesser Density Alternative, as compared to the probable impacts of the proposed action, are summarized below. As under the proposed action, the Lesser Density Alternative would not result in significant adverse impacts in the areas of land use, zoning, and public policy; socioeconomic conditions; community facilities and services (high schools, health care, publicly-funded day care, libraries, and fire and police protection services); open space; shadows; urban design and visual resources; natural resources; hazardous materials; water and sewer infrastructure; energy; transportation (parking, transit, and pedestrians); air quality; greenhouse gas emissions and climate change; noise; public health; neighborhood character; and construction. Also as under the proposed action, the Lesser Density Alternative would result in significant adverse impacts related to community facilities and services (elementary schools, although intermediate schools which would be impacted by the proposed action would not be impacted under the Lesser Density Alternative); and transportation (traffic). However, these school and traffic impacts would be of a lesser magnitude.

In addition, the Lesser Density Alternative would produce fewer new market rate and affordable housing in an area experiencing a strong trend of new residential development. As such, it would not provide the same level of benefit to the City's effort to expand the supply of affordable housing. In addition, the Lesser Density Alternative would not provide a new publicly-accessible open space in an area where the ratio of open space to population are generally low.

Land Use, Zoning, and Public Policy

Neither the Lesser Density Alternative nor the proposed action would result in significant adverse land use, zoning, and public policy impacts.

As under the proposed action, the Lesser Density Alternative would introduce new residential and local retail uses in the project area. The Lesser Density Alternative's mixed-use development would complement other recent and future development projects in the land use study area. However, the density of development that would occur under the Lesser Density Alternative would be lower than the density anticipated under the proposed action and would not result in the provision of a 26,000-sf publicly-accessible open space.

As under the proposed action, the Lesser Density Alternative would rezone the project area from its existing M3-1 manufacturing zoning to residential zoning with a commercial overlay. Also, as would be the case with the proposed action, under the Lesser Density Alternative the project area would be designated a MIHA. There would be no change in permitted use groups, as under both the Lesser Density Alternative and the proposed action, Use Groups 1 to 4 would be permitted by the underlying zoning and Use Groups 1 to 9 and 14 would be permitted under the C2-4 commercial overlay.

However, compared to the proposed action's mix of R7A, R7D, and R8A districts, the Lesser Density Alternative with R7A mapped across the entire project area would permit less floor area to be developed. As shown in Table 20-2, the proposed action would result in a weighted average maximum permitted FAR of approximately 6.0, resulting in a maximum permitted floor area of 1,095,435 zsf on the 182,366-sf project area. In contrast, the Lesser Density Alternative, with its R7A (MIH) zoning, would have a 4.6 maximum permitted FAR, resulting in a maximum permitted

floor area of 838,884 zsf, which is 256,551 zsf less than the proposed action. As such, the Lesser Density Alternative would limit maximum permitted residential FAR to a greater degree than the proposed action and would be less supportive of Housing New York, the City's ten-year strategy to build or preserve 200,000 units of high quality affordable housing to meet the needs of more than 500,000 people.

As also presented in Table 20-2, while the project area would be subject to varying contextual building envelope controls under the proposed action, with the maximum permitted height ranging from 90 feet/95 feet with qualifying ground floor to 140 feet/145 feet with qualifying ground floor, under the Lesser Density Alternative the 90-foot/95-foot limit would apply throughout the project area.

As such, while neither the Lesser Density Alternative nor the proposed action would result in significant adverse impacts on land use, zoning, and public policy, as the Lesser Density Alternative would include a smaller amount of residential floor area and commensurate decreases in overall number of dwelling units and affordable housing units, it would be less supportive of applicable public policies, including Housing New York, PlaNYC, and OneNYC.

Socioeconomic Conditions

Neither the Lesser Density Alternative nor the proposed action would result in significant adverse socioeconomic conditions impacts.

As with the proposed action, the Lesser Density Alternative would not have the potential to result in direct residential or business/institutional displacement as the project area is currently occupied by temporary activities operating under short-term rental terms and there are no buildings located there. Likewise, as both the Lesser Density Alternative and the proposed action would introduce less than 200,000 sf of commercial space, neither would have the potential to result in significant adverse impacts related to indirect business or institutional displacement.

In terms of indirect residential displacement, the Lesser Density Alternative would include 862 DUs, compared to 1,147 DUs under the proposed action, with up to 259 affordable housing DUs. The 862 DUs would introduce approximately 3,060 residents, which would result in an increase in the half-mile radius Socioeconomic Conditions study area residential population of approximately 4.1 percent, compared to the 5.4 percent residential population increase that would result from the proposed action.

Table 20-2, Comparison of Existing, Proposed Action, and Lesser Density Alternative Zoning

	Existing	**Proposed Action**	**Lesser Density Alternative**
	M3-1	**R7A (MIHA)[1], R7D (MIHA)[1] and R8A (MIHA)[1] / C2-4**	**R7A (MIHA) / C2-4**
Use Groups:	6-14, 16, 17, 18	R7A/R7D/R8A (MIHA): 1-4; C2-4: 1-9, 14	
Floor Area Ratio (FAR): **- Commercial**	2.00	C2-4: 2.00	
- Community Facility	N/A (not permitted)	R7A: 4.0; R7D: 4.2; R8A: 6.5	R7A: 4.0
- Residential	N/A (not permitted)	R7A (MIHA): 4.6 R7D (MIHA): 5.6 R8A (MIHA): 7.2 Weighted Ave for Site: 6.0	R7A (MIHA): 4.6
- Manufacturing	2.00	N/A (not permitted)	
Project Area Maximum Permitted Floor Area	364,732 zsf	1,095,435 zsf	838,884 zsf
Sky Exposure Plane: **- Streetwall max. height**	60 feet or 4 stories (whichever is less)	N/A	
- Initial setback distance	20 feet (narrow street); 15 feet (wide street)		
- Sky exposure plane ratio	2.7 to 1 (narrow street); 5.6 to 1 (wide street)		
Contextual Zoning (QHP): **- Streetwall height (min.-max.)**	N/A	R7A: 40 – 75 feet R7D: 60 – 95 feet R8A: 60 – 105 feet	R7A: 40 – 75 feet
- Setback distance		R7A/R7D/R8A: 15 feet (narrow street); 10 feet (wide street)	
- Maximum building height		R7A: 90 feet (95 feet)[2]; 9 stories R7D: 110 feet (115 feet)[2]; 11 stories R8A: 140 feet (145 feet)[2]; 14 stories	R7A: 90 feet (95 feet)[2]; 9 stories
Required Accessory Parking (minimum): **- Automobile Repairs**	1 space per 800 zsf	N/A	
- General retail	1 space per 300 zsf	1 space per 1,000 zsf	
- Residence	N/A	R7A/R7D: 0.5 space per DU R8A: 0.4 space per DU 0 spacer per DU for affordable house units in the "transit zone"[2]	R7A: 0.5 space per DU 0 spacer per DU for affordable house units in the "transit zone"[2]

Note:
[1] The proposed R7A, R7D, and R8A districts would be in a designated Mandatory Inclusionary Housing Area (MIHA); as such the maximum permitted density (FAR) is modified by the MIH zoning regulations and eligible for maximum height modifications under the ZQA regulations.
[2] Transit zone is comprised of certain designated areas outside the Manhattan Core well-served by transit. Refer to ZR Appendix I for maps and definition of units governed by the transit zone rules.

As the Lesser Density Alternative would result in an incremental study area population increase of less than five percent, it would not be considered large enough to have the potential to affect real estate market conditions in the area. However, as noted in Chapter 3, "Socioeconomic Conditions," while the proposed action would increase the study area residential population by more than five percent, given that the study area has already experienced a readily observable trend toward increasing rents and new market-rate development, the proposed action would not result in a significant adverse indirect residential displacement impact. In addition, compared to the proposed action, the Lesser Density Alterative would introduce fewer affordable housing units and would, therefore, expand the study area's supply of affordable housing to a lesser degree than the proposed action.

Community Facilities and Services

The Lesser Density Alternative would introduce fewer residential units in the project area, as compared to the proposed action and place less demand on local community facilities and services. As such, as is the case with the proposed action, the Lesser Density Alternative would not result in significant adverse impacts on elementary schools, high schools, health care, publicly-funded day care, libraries, and fire and police protection services. However, unlike the proposed action, which would also result in a significant adverse impact on intermediate schools, the Lesser Density Alternative would not result in a significant adverse impact on intermediate schools.

With 862 DUs, compared to 1,147 DUs with the proposed action, the Lesser Density Alternative would generate 103 intermediate school students. Table 20-3 provides information for the intermediate school utilization for the Lesser Density Alternative and provides a comparison with No-Action utilization rates. For intermediate schools, under the Lesser Density Alternative the utilization rate in CSD 14, Sub-district 1 would increase over No-Action levels by 4.6 percentage points, from 135.9 percent to 140.5 percent, which does not exceed the 5 percent increase impact threshold.

Table 20-3, 2019 - Total Projected Lesser Density Alternative Enrollment and Utilization change for Elementary and Intermediate Schools in CSD 14, Sub-district 1

	2019 No-Action Total Projected Enrollment	Students Generated by the Proposed Action/RWCDS[1]	Total Projected With-Action Enrollment	Capacity	Available Seats	Utilization With Action (%)	Utilization No Action (%)	Increase in Utilization (%) from No-Action Condition
Intermediate Schools	3,046	103	3,149	2,242	-907	140.5%	135.9%	4.6%

Note: [1] 862 DUs, @ 0.12 intermediate students per DU = 103

Open Space

Neither the Lesser Density Alternative nor the proposed action would result in significant adverse open space impacts.

The Lesser Density Alternative would introduce 228 employees, slightly less than the 240 employees that would be generated by the proposed action and which is below the applicable screening threshold for detailed analysis of employee effects. In terms of residents, the Lesser Density Alternative would introduce 3,060 residents, which would be 1,012 fewer residents than the 4,072 residents generated by the proposed action. In addition, unlike the proposed action the Lesser Density Alternative would not include 26,000 sf of publicly-accessible open space. The Lesser Density Alternative would result in a decrease in the study area's open space ratio of approximately 3.9 percent, which would fall below the 5 percent decrease impact threshold. Refer to Table 20-4. However, without the provision of the new open space, the surrounding community would not benefit from the introduction of a new publicly-accessible open space in an area experiencing a trend of residential development where existing open space ratios are generally low.

Table 20-4, 2019 Lesser Density Alternative: Open Space Ratios Summary

Study Area Residential Population		Open Space Acreage			Open Space Ratio per 1,000 people		
		Total	Active	Passive	Total	Active	Passive
% Change No-Action to With-Action (L.D.A.)	+4.0%	0%	0%	0%	-3.9%	-3.9%	-3.9%
With-Action (L.D.A.)	78,860	33.61	26.62	6.99	0.426	0.338	0.089
No-Action	75,800	33.61	26.62	6.99	0.443	0.351	0.092
Existing	69,119	33.61	26.62	6.99	0.486	0.385	0.101
OPEN SPACE GUIDELINE					2.5	2.0	0.5

Shadows

Neither the Lesser Density Alternative nor the proposed action would result in significant adverse shadows impacts.

Similar to the proposed action, the Lesser Density Alternative would result in new development in the project area with maximum building heights exceeding 50 feet; however, as discussed above, the Lesser Density Alternative buildings' maximum building heights would be lower than those anticipated for the proposed action, while having similar building bases. As such, the maximum shadow length from the project area buildings would be lower than under the proposed action.

Historic and Cultural Resources

Neither the Lesser Density Alternative nor the proposed action would result in significant adverse impacts on historic and cultural resources.

There are no architectural or archaeological resources on the project area and no resources of concern in the study area. Accordingly, both the Lesser Density Alternative and the proposed action would not have the potential to affect any historic architectural or archaeological resources.

Urban Design and Visual Resources

Neither the Lesser Density Alternative nor the proposed action would result in significant adverse impacts on urban design and visual resources.

As under the proposed action, the Lesser Density Alternative would result in a notable change to the urban design of the project area, compared to No-Action conditions. Specifically, the Lesser Density Alternative would add new contextual buildings to a site that would otherwise continue to have no buildings in an area that experiencing substantial new residential development. As with the proposed action, this would better connect the area physically and visually.

In terms of massing, while the Lesser Density Alternative would comprise buildings with lower maximum building heights than some of the proposed action buildings, the pedestrian experience in the urban design and visual resources study area would be generally similar (refer to Figures 20-2a, 20-2b and 20-2c), although building heights under Lesser Density Alternative would be lower in some locations. Both scenarios would help to activate the street with ground floor retail uses, new streetwalls, and upgraded sidewalks with street trees as required by City regulations for new development. However, unlike the proposed action, the Lesser Density Alternative would not provide the midblock publicly-accessible open space and the enhancements to area's urban design that it would provide, as it would not provide a space breaking the bulk of the project area blocks into discrete sections and the visual amenities associated with the open space.

Hazardous Materials

Neither the Lesser Density Alternative nor the proposed action would result in significant adverse hazardous materials impacts.

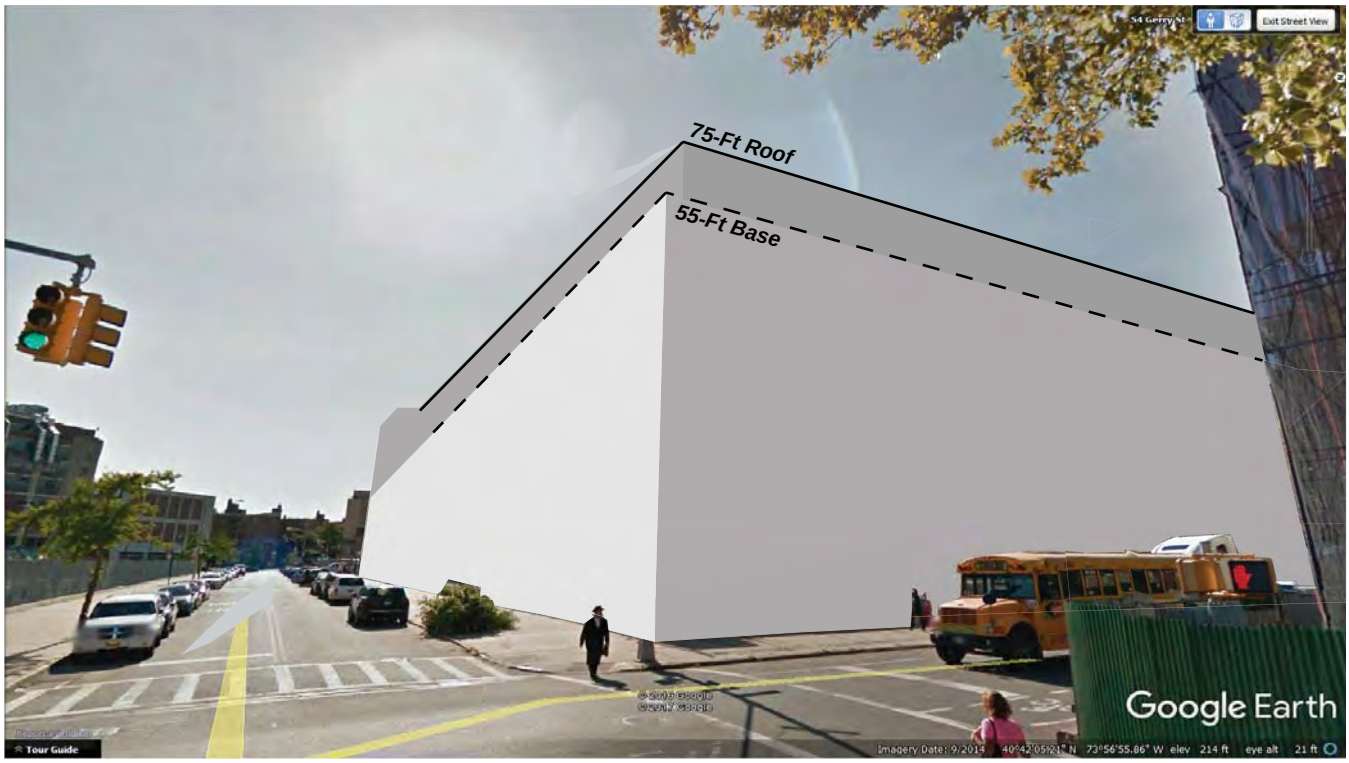
As under the proposed action, the Lesser Density Alternative would include the mapping of an (E) designation on both blocks of the project area that would require investigation, testing, and, if warranted, remediation prior to any future development with oversight provided through the New York City Mayor's Office of Environmental Remediation (OER). With the requirements of the (E) designation on the project area, there would be no significant adverse impact from the potential presence of contaminated materials.

Water and Sewer Infrastructure

Neither the Lesser Density Alternative nor the proposed action would result in significant adverse water and sewer infrastructure impacts.

Compared to the proposed action, the Lesser Density Alternative would have less water demand (332,571 gallons per day [gpd], compared to 433,771 gpd under the proposed action). Under both the Lesser Density Alternative and the proposed action the project area would be required to comply with stormwater release rate requirements applicable to new developments and sewer improvements and/or a new drainage plan, may also be required at the time of the house or site connection proposal; however, as the Lesser Density Alternative would generate less sanitary

Comparison of Proposed Project and Lesser Density Alternative - View west from Gerry Street and Harrison Avenue

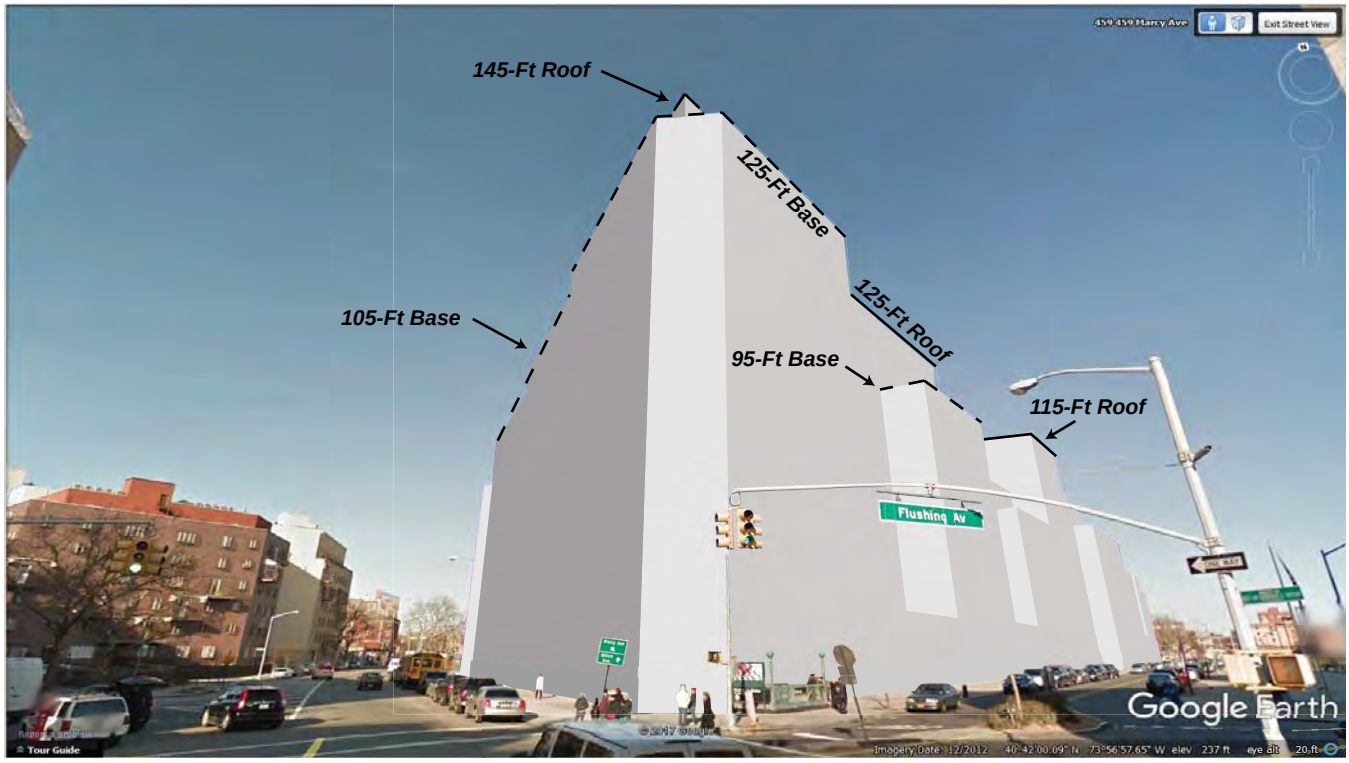


Lesser Density Alternative

Proposed Project

Comparison of Proposed Project and Lesser Density Alternative - View north at Gerry Street, Flushing and Union avenues

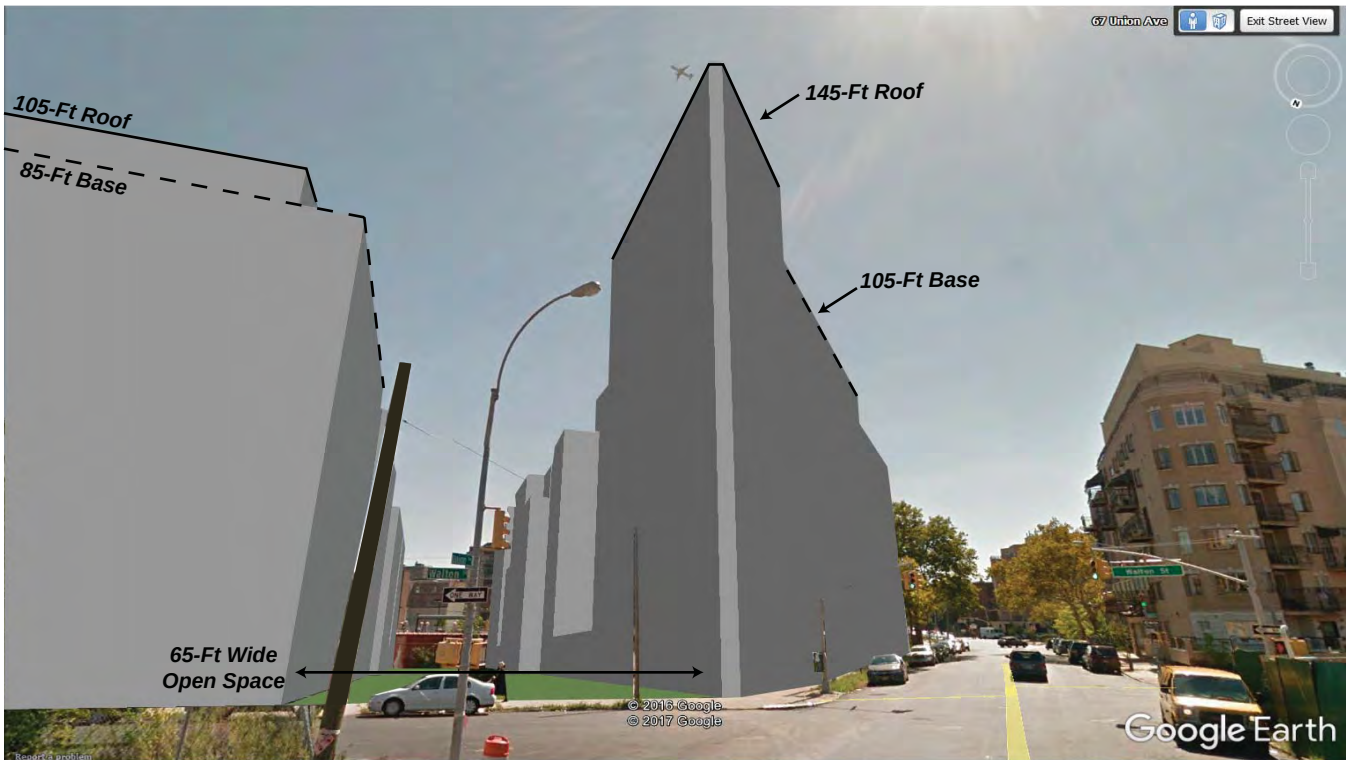
Lesser Density Alternative



Proposed Project

Comparison of Proposed Project and Lesser Density Alternative - View southeast from Walton Street and Union Avenue

Lesser Density Alternative



Proposed Project

sewage due to its comparatively lesser density, the Lesser Density Alternative would result in comparatively lesser demand on the adjacent sewer infrastructure.

Energy

Neither the Lesser Density Alternative nor the proposed action would result in significant adverse energy impacts.

As the Lesser Density Alternative would result in the development of less floor area than the proposed action, the Lesser Density Alternative would generate comparatively less energy demand.

Transportation

As a result of the reduction in the development anticipated in the project area under the Lesser Density Alternative, there would be fewer project-generated vehicle, transit, and pedestrian trips and less parking demand, compared to the proposed action. Based on the trip generation assumptions detailed in Chapter 12, "Transportation," the Lesser Density Alternative would generate approximately 992, 2,232, 1,760, and 1,833 fewer incremental person trips in the weekday AM, midday, and PM and Saturday midday peak hours, respectively (see Table 20-5). As under the proposed action, it is anticipated that the Lesser Density Alternative would result in significant adverse traffic impacts, with the same number of intersections impacted under both scenarios. Neither the proposed action nor the Lesser Density Alterative would result in significant adverse parking, transit, or pedestrian impacts.

Traffic

Both the Lesser Density Alternative and the proposed action would result in significant adverse traffic impacts.

As presented in Table 20-6, compared to the proposed action, the Lesser Density Alternative would generate 35, 20, 39, and 38 fewer vehicle trips in the weekday AM, midday, and PM and Saturday midday peak hours, respectively. Study area intersections with significant adverse impacts under the proposed action were, therefore, evaluated to determine if the impacts would also occur under the Lesser Density Alternative, and if the impacts could be mitigated. Overall, as presented in Table 20-7, the Lesser Density Alternative would result in four, four, six, and one impacted lane groups at four, three, six, and one intersections in the weekday AM, midday, PM, and Saturday midday peak hours, respectively. By comparison the proposed action would result in four, four, eight, and one impacted lane groups at four, three, six, and one intersections in the weekday AM, midday, PM, and Saturday midday peak hours, respectively. The only difference between the two scenarios is in the PM peak hour, when the Lesser Density Alternative would result in two fewer impacted lane groups, with six as compared to eight for the proposed action. However, the number and location of impacted intersections in each peak hour would not change and overall both scenarios would result in a total of seven intersections being impacted in one or more peak hours. As such, there would not be a substantial change in traffic impacts with the adoption of the Lesser Density Alternative as compared to the proposed action. However, at several lane groups where significant adverse impacts are anticipated under both scenarios, under the Lesser Density

Alternative, the LOS would be improved, compared to conditions in the future with the proposed action (refer to Table 20-7).

Table 20-5, Comparison of Peak Hour Person Trips by Mode: Proposed Action vs. Lesser Density Alternative

Scenario	Auto	Taxi	Subway	Railroad	Bus	Walk/Other	Total
Weekday AM							
Proposed Action	199	0	471	2	81	466	1,219
Lesser Density Alterative	157	0	354	2	65	414	992
Difference	-42	-	-117	-	-16	-52	-227
Weekday Midday							
Proposed Action	188	20	298	0	140	1,710	2,356
Lesser Density Alterative	162	20	232	0	134	1,684	2,232
Difference	-16	-	-66	-	-6	-26	-124
Weekday PM							
Proposed Action	240	12	538	2	133	1,088	2,013
Lesser Density Alterative	193	12	410	2	114	1,029	1,760
Difference	-47	-	-128	-	-19	-59	-253
Saturday Midday							
Proposed Action	225	13	482	0	135	1,194	2,049
Lesser Density Alterative	183	13	372	0	121	1,144	1,833
Difference	-42	0	-110	-	-14	-50	-216

Table 20-6, Comparison of Peak Hour Vehicle Trips: Proposed Action vs. Lesser Density Alternative

Scenario	Auto	Taxi	Truck	Total
Weekday AM				
Proposed Action	159	0	8	167
Lesser Density Alterative	126	0	6	132
Difference	-33	-	-2	-35
Weekday Midday				
Proposed Action	122	32	4	158
Lesser Density Alterative	102	32	4	138
Difference	-20	0	0	-20
Weekday PM				
Proposed Action	182	24	0	206
Lesser Density Alterative	143	24	0	167
Difference	-39	-	0	-39
Saturday Midday				
Proposed Action	171	24	4	199
Lesser Density Alterative	133	24	4	161
Difference	-38	-	-	-38

Table 20-7, Future Traffic Impact Comparison: Lesser Density Alternative vs. Proposed Action

	LANE GROUP	WEEKDAY AM PEAK HOUR						WEEKDAY MD PEAK HOUR						WEEKDAY PM PEAK HOUR						SATURDAY MD PEAK HOUR					
		With-Action			LDA			With-Action			LDA			With-Action			LDA			With-Action			LDA		
		V/C RATIO	Delay (sec.)	LOS	V/C RATIO	Delay (sec.)	LOS	V/C RATIO	Delay (sec.)	LOS	V/C RATIO	Delay (sec.)	LOS	V/C RATIO	Delay (sec.)	LOS	V/C RATIO	Delay (sec.)	LOS	V/C RATIO	Delay (sec.)	LOS	V/C RATIO	Delay (sec.)	LOS
1. Harrison Avenue (E-W) @	EB - LTR	0.93	82.0	F	0.93	82.0	F	0.95	79.0	E *	0.95	79.0	E *	0.87	69.0	E *	0.86	68.1	E	0.38	34.9	C	0.38	34.8	C
Union Avenue (N-S)	NB - LT	0.74	41.1	D	0.72	40.3	D	0.65	35.1	D	0.65	34.9	C	0.49	32.0	C	0.48	31.9	C	0.42	28.2	C	0.40	27.9	C
	SB - LTR	1.62	342.1	F *	1.59	326.5	F *	1.32	204.3	F *	1.31	200.4	F *	1.30	194.4	F *	1.27	184.0	F *	0.79	48.8	D *	0.76	46.0	D *
2. Lorimer Street (E-W) @	EB - LTR	0.39	42.3	D	0.39	42.3	D																		
Union Avenue (N-S)	WB - LT	0.29	38.2	D	0.29	38.2	D																		
	NB - LTR	0.90	59.5	E *	0.88	56.0	E *																		
	SB - LTR	0.26	9.7	A	0.26	9.7	A																		
3. Walton Street (EB) @	EB - LTR																								
Union Avenue (N-S)	NB - TR																								
	SB - LT																								
4. Wallabout Street (E-W) @	EB - LT																								
Union Avenue (N-S)	WB - TR																								
	NB - LTR																								
	SB - LR																								
5. Flushing Avenue - Gerry Street (E-W) @	EB - LT	0.62	17.8	B	0.62	17.7	B	0.80	24.4	C	0.80	24.3	C	0.96	49.3	D *	0.93	43.6	D						
Marcy Avenue - Union Avenue (NB)	WB - TR	0.59	16.1	B	0.58	15.9	B	0.57	14.1	B	0.57	14.0	B	0.57	15.3	B	0.57	15.3	B						
	NB - LTR	1.22	157.3	F *	1.22	155.7	F *	0.94	54.3	D *	0.94	54.3	D *	0.97	71.2	E *	0.96	68.4	E *						
6. Lorimer Street (E-W) @	EB - TR													0.23	37.4	D	0.22	37.3	D						
Harrison Avenue (SB)	WB - LT													0.93	82.6	F *	0.93	82.6	F *						
	SB - LTR													0.37	10.5	B	0.36	10.5	B						
7. Walton Street (EB) @	EB - TR													0.46	36.9	E *	0.44	35.4	E *						
Harrison Avenue (SB)	SB - LT													0.03	8.5	A	0.03	8.5	A						
(Unsignalized)																									
8. Wallabout Street (E-W) @	EB - R	0.39	33.8	C	0.34	32.1	C	0.36	26.2	C	0.35	25.7	C	0.52	37.9	D	0.43	36.3	D						
Harrison Avenue (SB)	WB - LT	0.96	76.5	E *	0.93	69.4	E *	0.85	49.1	D *	0.83	46.5	D *	0.93	70.3	E *	0.89	62.0	E *						
	SB - TR	0.59	21.1	C	0.59	21.1	C	0.54	16.2	B	0.54	16.2	B	0.81	31.2	C	0.80	30.8	C						
9. Gerry Street (E-W) @	EB - TR													0.32	32.7	C	0.30	32.5	C						
Harrison Avenue (SB)	SB - LT													0.97	48.6	D *	0.97	48.4	D *						
10. Bartlett Street (E-W) @	SB - LT																								
Harrison Avenue (SB)	SB - R																								
	SB - LTR																								

Notes:
EB-Eastbound, WB-Westbound, NB-Northbound, SB-Southbound
L-Left, T-Through, R-Right, DefL-Analysis considers a defacto left lane on this approach
V/C Ratio - Volume to Capacity Ratio, sec. - Seconds
LOS - Level of Service
* - Denotes a congested movement (LOS E or F, or V/C ratio greater than or equal to 0.9)
Analysis is based on the 2000 Highway Capacity Manual methodology (HCS+, version 5.5)

.

Parking

Neither the Lesser Density Alternative nor the proposed action would result in significant adverse parking impacts.

As compared to the proposed action, the Lesser Density Alternative would result in fewer dwelling units and few parking spaces. The number of dwelling units would decrease by approximately 25 percent, from 1,147 DUs to 862 DUs, while parking would be reduced by approximately 15 percent, from 427 spaces to 365 spaces. The lower reduction in parking spaces reflects a difference in parking requirements; under the Lesser Density Alternative accessory parking would be required at a rate of 0.5 spaces per market rate DU, while under the proposed action the 0.5-space-per-DU requirement would apply in the R7A and R7D portions of the project area but in the R8A portion there is a lower requirement, specifically 0.4 spaces per market rate DU. Therefore, proportionally there would be a higher ratio of parking spaces to dwelling units and overall development. Consequently, as the required accessory parking for the proposed action would be sufficient to meet the site-generated demand, the Lesser Density Alternative also would have sufficient required accessory parking to meet site-generated demand.

Transit and Pedestrians

Neither the Lesser Density Alternative nor the proposed action would result in significant adverse impacts on transit or pedestrians.

As presented in Table 20-5, the Lesser Density Alternative would generate fewer transit and pedestrian trips than the proposed action, while transit services and pedestrian facility physical conditions would be the same under both scenarios.

Air Quality

Mobile Sources

Neither the Lesser Density Alternative nor the proposed action would result in significant adverse air quality mobile source impacts.

The proposed action did not exceed screening thresholds for detailed analysis of air quality mobiles source emissions, and therefore it would not have the potential to result in significant adverse air quality mobile source impacts. As the Lesser Density Alternative would generate fewer incremental vehicle trips than the proposed action, detailed air quality mobile source analysis is not warranted and the Lesser Density Alternative would not have the potential for significant adverse air quality mobile source impacts.

Per the garage emissions analysis provided in Chapter 13, "Air Quality," the proposed action would not result in a significant adverse impact related to garage emissions from action-generated emissions. The Lesser Density Alternative would generate fewer vehicle trips and fewer parking

spaces, however it may have the potential to result in a larger garage than would occur under the proposed action. The required residential and commercial accessory parking under the Lesser Density Alternative for the Northern Block would be 151 spaces and for the Southern Block would be 235 spaces. As a result, it is possible that the Southern Block could have a garage with more spaces than the largest garage for the proposed action/RWCDS, which is the Buildings F/G/H garage with 166 spaces. If the Lesser Density Alternative is proposed for adoption, then a refined garage analysis may be warranted to consider the effects of a larger garage and make an impact determination.

Stationary Sources

Neither the Lesser Density Alternative nor the proposed action would result in significant adverse air quality mobile source impacts.

As discussed in Chapter 13, the proposed action would require an (E) designation for air quality specifying the use of natural gas for building boilers and the implementation of boiler stack location restriction in order to preclude the potential for significant adverse impacts related to air quality HVAC system emissions. If the Lesser Density Alternative is proposed for adoption a refined analysis would be warranted to modify these requirements as necessary to reflect conditions under this alternative.

As also discussed in Chapter 13, an industrial sources analysis was conducted for the proposed action and found that the introduction of sensitive receptors to the project area would not result in a significant adverse impacts related to industrial source emissions. This would also be applicable to the Lesser Density Alternative, which would also introduce sensitive receptors to the project area, though at a lower density and lower maximum height than the proposed action.

Greenhouse Gas Emissions and Climate Change

Neither the Lesser Density Alternative nor the proposed action would result in significant adverse greenhouse gas emissions and climate change impacts.

With less development than under the proposed action, the Lesser Density Alterative would use less energy and would, therefore, result in fewer CO_2e emissions per year. In addition, both the proposed action and the Lesser Density Alternative would be required to meet the standards of the New York City Building Code and the Best Available Flood Hazard Data from the Federal Emergency Management Agency (FEMA) at the time of their construction.

Noise

Neither the Lesser Density Alternative nor the proposed action would result in significant adverse noise impacts.

Both the proposed action and the Lesser Density Alternative would result in the introduction of noise sensitive receptors in an area with existing ambient noise. As under the proposed action, the Lesser Density Alternative would include the mapping of an (E) designation on the project area

that would require window wall attenuation and alternate means of ventilation in order to assure acceptable interior noise levels. These requirements would preclude the potential for significant adverse noise impacts.

As noted above, the Lesser Density Alternative would generate fewer vehicle trips than the proposed action and would, therefore, result in lower incremental mobile source noise emissions. As under the proposed action, no significant adverse mobile source noise impacts would result.

Public Health

Neither the Lesser Density Alternative nor the proposed action would result in significant adverse public health impacts.

As under the proposed action, the Lesser Density Alternative would not result in significant adverse impact in the areas of air quality, operational noise, water quality, hazardous materials, or construction and overall would not have adversely affect public health.

Neighborhood Character

Neither the Lesser Density Alternative nor the proposed action would result in significant adverse neighborhood character impacts.

As with the proposed action, the Lesser Density Alternative would not result in significant adverse impacts in the areas of land use, zoning, and public policy; socioeconomic conditions; open space; historic and cultural resources; shadows; urban design and visual resources; or noise. Significant adverse transportation impacts, which would occur under both scenarios, would not affect any defining feature of neighborhood character. In addition, a combination of moderate effects of the proposed action would not create a significant adverse neighborhood character impact.

Both the proposed action and the Lesser Density Alternative would facilitate the development of a mix of residential and local retail uses on open lots, which would be consistent with the mixed-use character of the existing and planned No-Action developments of the surrounding neighborhoods and activate the streetscape adjoining the project area. However, the Lesser Density Alternative would provide fewer benefits to neighborhood character as it would not include the midblock publicly-accessible open space that would be provided under the proposed action. Also, the Lesser Density Alternative would result in the creation of fewer affordable housing units than the proposed action and consequently not contribute to increasing the amount of affordable housing in a neighborhood that continues to exhibit trends towards increased housing costs to the same degree as would the proposed action.

Construction

Neither the Lesser Density Alternative nor the proposed action would result in significant adverse construction impacts.

As with the proposed action, construction of project buildings would be expected to be completed in less than two years. Temporary effects of construction under both scenarios would be considered short-term in duration and would be subject to New York City Construction Code and other regulations applicable to construction, including those that time of day restrictions and rules regarding air quality and noise.

E. NO SIGNIFICANT ADVERSE SCHOOLS IMPACTS ALTNERATIVE

As described in Chapter 4, "Community Facilities and Services," the proposed action would result in significant adverse impacts intermediate schools. Measures that would fully mitigate these impacts are identified in Chapter 19, "Mitigation."

The study area for intermediate school impact analysis is the sub-district of the community school district in which the project is located. CEQR defines a significant adverse impact as a condition in which the collective utilization rate for schools in the study area is equal to or greater than 100 percent in the With-Action and there is an increase of five percent or more in the collective utilization rate between No-Action and With-Action conditions. Impact determinations are made separately for elementary and intermediate schools.

Under With-Action conditions for the proposed action, intermediate schools in the study area would operate at 142.0 percent of capacity, approximately 6.2 percentage points higher than under No-Action. As such, the proposed action would result in an over utilization of intermediate school facilities and a 5 percentage point or greater increase in the utilization rate over No-Action conditions. The proposed action would not result in significant adverse impacts on elementary or high schools or other type of community facilities and services considered under CEQR.

The purpose of this alternative is to determine if there is a practicable alternative to the proposed action that could eliminate the elementary and intermediate schools impacts by reducing the number of residential units developed in the project area.

To eliminate the intermediate school impact, the number of residential units would have to be reduced by approximately 19.8 percent from 1,147 DUs to 920 DUs. A development of this size would generate 110 intermediate school students, based on rates provided for Brooklyn in the *CEQR Technical Manual*, as compared to 138 intermediate school students for the proposed action. With this reduction, intermediate schools in the study area would operate at 140.8 percent of capacity, approximately 4.9 percentage points higher than under No-Action. Refer to Table 20-8. As such, under this alternative the increase in school utilization of intermediate schools would be below the 5-percent increase impact threshold and therefore the proposed action's significant adverse intermediate school impacts would be eliminated.

Table 20-8, 2019 - Total Projected Enrollment and Utilization change for Elementary and Intermediate Schools in CSD 14, Sub-district 1: No Significant Adverse Schools Impacts Alternative

	2019 No-Action Total Projected Enrollment	Students Generated by the Proposed Action/RWCDS[1]	Total Projected With-Action Enrollment	Capacity	Available Seats	Utilization With Action (%)	Utilization No Action (%)	Increase in Utilization (%) from No-Action Condition
Intermediate Schools	3,046	110	3,156	2,242	-914	140.8%	135.9%	4.9%

Note: [1] 920 DUs, @ 0.12 intermediate students per DU = 110

The reduction in density required for this alternative would be similar, but of a slightly lesser magnitude than that of the Lesser Density Alternative described above, which would include 862 DUs. If, like the proposed action and the Lesser Density Alternative, the No Significant Adverse Schools Impacts would also include 64,807 gsf of local retail, then it would have a built FAR of approximately 4.88, which is 6 percent higher than the 4.6 FAR permitted for R7A (MIHA) districts considered in the Lesser Density Alternative and 19 percent lower than the weighted average 6.0 FAR permitted for the proposed action. As with the Lesser Density Alternative, the No Significant Adverse Schools Impacts Alternative would not include the 26,000-sf publicly-accessible open space that would be part of the proposed action. This alternative may be feasible, however, similar to the Lesser Density Alternative it would not provide the same level of benefits as the proposed as it would result in fewer affordable housing units and would not provide a 26,000-sf publicly-accessible open space in a growing residential area with relatively low open space ratios.

With 920 DUs, the No Significant Adverse Schools Impacts Alternative would generate a residential population of 3,266 residents, slightly higher than the 3,060 residents generated by the 862-DU Lesser Density Alternative but lower than the 4,072 residents generated by the 1,147-DU proposed action. Given its size relative to the Lesser Density Alternative, the environmental effects of the No Significant Adverse Schools Impacts Alternative would be generally similar to the Lesser Density Alternative, outlined above, with significant adverse impacts anticipated for traffic and no significant adverse impacts anticipated for other technical areas.