



# 2

## Land Use, Zoning, and Public Policy

This section considers the potential for the Proposed Action to result in significant adverse impacts to land use, zoning, and public policy. Under the guidelines of the *2020 City Environmental Quality Review (CEQR) Technical Manual*, this analysis evaluates the uses in the area that may be affected by the Proposed Action and determines whether the Proposed Action is compatible with land use, zoning, and public policy conditions, or may otherwise affect them.

### Introduction

The New York City Department of City Planning (DCP) proposes a zoning text amendment to establish a City Planning Commission ~~special permit~~ Special Permit (the CPC ~~special permit~~ Special Permit) for new hotel development in commercial districts and mixed-use districts citywide. The CPC ~~special permit~~ Special Permit would be required for transient accommodations including hotels, motels, and boatels.

**Chapter 1, Project Description**, provides a description of the existing zoning regulations—including the definition of transient hotels and less common forms such as motels, tourist cabins, and boatels—and the likely effects of the Proposed Action on future development.

The Proposed Action would be a citywide action that would be generically applicable. Therefore, a generic reasonable worst-case development scenario (RWCDs) that captures supply and demand estimates under the No-Action and With-Action conditions ~~were~~ was

analyzed. This chapter considers the Proposed Action's potential effects on land use, zoning, and public land use policies.

## Principal Conclusions

Analyses were conducted on the generic action to assess land use, zoning, and public policy as it pertains to the unmet demand for hotel rooms resulting from the Proposed Action. The analysis concluded the Proposed Action would not have the potential to significantly affect land use, zoning or public policy.

## Land Use and Zoning

By introducing a CPC ~~special permit~~ Special Permit, the DCP proposes a case-by-case, site-specific review process to ensure that hotel development occurs only in appropriate locations, based on reasonable considerations regarding opportunities for the future siting of a permitted use on the site and the achievement of a balanced mix of uses in the area.

In commercial districts citywide, the Proposed Action would reduce the occurrence of hotels and potential land use conflicts resulting from hotel development. It is expected that various other uses would be developed in the place of hotels. The Proposed Action would change the existing zoning to permit hotels by ~~special permit~~ Special Permit only. Otherwise, zoning under the future With-Action condition is not expected to change from the future No-Action condition.

## Public Policy

The Proposed Action would not hinder the goals of relevant public policies, and there would be no adverse impact due to the Proposed Action.

## Methodology

This analysis of land use, zoning, and public policy follows the guidelines set forth in the *CEQR Technical Manual* for a preliminary assessment (Section 320). *CEQR Technical Manual* guidelines for land use, zoning, and public policy are most appropriate for site specific projects. According to the *CEQR Technical Manual*, a preliminary land use and zoning assessment:

- › Describes existing and future land uses and zoning information, and describes any changes in zoning that could cause changes in land use;
- › Characterizes the land use development trends in the area surrounding a project site that might be affected by the Proposed Action; and
- › Determines whether a proposed project is compatible with those trends or may alter them.

Since the Proposed Action is applicable to commercial and MX districts citywide, a discussion of the range of conditions under which the actions may take place is appropriate. Therefore, this assessment provides a summary of the land use characteristics of different types of districts where hotels are located, as well as basic zoning information of those

districts. Public policies that the Proposed Action may affect by changing land uses in these areas are also analyzed.

## Impact Assessment

The *CEQR Technical Manual* guidance states that many land use changes may be significant, but not adverse. Land use impacts, when they do occur, are often associated with impacts in other technical areas. If the proposed project would directly displace a land use and such loss would adversely affect surrounding land uses, this displacement should be considered under a Socioeconomic Conditions analysis. If a project would alter development patterns, it could affect the real estate market or industry conditions in the area and should be considered in an analysis of Socioeconomic Conditions.

For public policy, the following should be considered in determining whether land use changes are significant and adverse:

- › Whether the project would create a land use conflict or would itself conflict with public policies and plans for the site or surrounding area.
- › Whether the project would result in significant material changes to existing regulations or policy.

## Assessment

### Land Use and Zoning

#### Existing Conditions

##### *Zoning Districts Where Hotels are Allowed As-of-Right and by Special Permit*

Current zoning allows hotels to be developed as-of-right in the following zoning districts: C1 (except for C1-1, C1-2, C1-3 or C1-4 Districts), C2<sup>1</sup>, C4, C5, C6, and C8. Hotels are also permitted as-of-right in Mixed Use districts (MX), paired M1/R districts, M1-6D<sup>2</sup> districts, and in M1 zones at the City's airports. Motels, tourist cabins, and boatels are permitted as-of-right in C6<sup>3</sup> and C8 districts, and in C2 districts within a 1,000-foot radius of the entrance/exit of a limited-access expressway.

C1 and C2 districts are typically neighborhood-oriented commercial districts that contain a variety of retail shops and other businesses that primarily serve the neighborhood's commercial needs. C1 and C2 districts are mapped in all five boroughs.

C4, C5, and C6 districts typically serve a population larger than a single neighborhood and contain a wider range of commercial uses than those found in C1 and C2 districts, including retail and department stores, entertainment uses, office buildings, and hotels. C4, C5, and C6 districts often contain regional and central business districts that range in type from

<sup>1</sup> In C2-1 through C2-4 districts, transient hotels may be located only within a 1,000-foot-radius of the entrance/exit of a limited-access expressway.

<sup>2</sup> M1-6D districts allow hotels as of right with certain size restrictions per Section 42-483 of the Zoning Resolution.

<sup>3</sup> Except in C6-1A districts.

shopping centers along arterial highways to neighborhood centers to the Midtown Manhattan commercial core.

Commercial areas within the Manhattan Core, which is currently zoned a with a mix of C4 through C6 districts, are zoned to promote high-bulk commercial land uses such as corporate headquarters, large hotels, department stores, and entertainment facilities in high-rise mixed buildings. These districts serve the entire metropolitan region. Hotels are a common use in these districts that are supportive of the City's business sectors, the convention business, and larger public events.

Hotels outside the Manhattan Core tend to be smaller on average as well as offer fewer amenities related to meetings and business activity. These central business districts outside of the Manhattan Core (Downtown Brooklyn, Long Island City, Downtown Jamaica, Downtown Flushing, 125th Street in Manhattan) have a mix of commercial zoning ranging from C4 through C6 districts. These districts often are mixed with different retail types, offices, and dense residential use.

C8 districts permit automotive and other heavy commercial uses, as well as a full range of other commercial uses. These districts sometimes act as a bridge between manufacturing districts and other commercial districts and they often contain a commercially diverse set of activities that include hotels.

MX and paired M1/R districts permit a mix of residential, commercial, and manufacturing uses and pair an M1 district with a residence district, allowing in close proximity a broad range of uses that are considered compatible.

M1-6D districts were introduced by the City in 2011 to facilitate the creation of vibrant mixed-use areas by preserving existing concentrations of Class B and C office and light industrial space, while allowing contextual, infill residential development with ground-floor retail on underbuilt sites. Within M1-6D districts, hotels are allowed as-of-right with certain size restrictions, per Section 42-483 of the Zoning Resolution.<sup>4</sup> M1-6D districts are located in Manhattan in the area south of Penn Station.

M1 districts are light manufacturing districts that are designed for a wide range of industrial and commercial uses as well as a limited number of community facility uses. M1 districts in some cases act as transition zones between residential areas and areas with heavier industrial activity. Prior to the adoption of the M1 Hotel Text Amendment in 2018, hotels were permitted as-of-right in M1 districts, but as-of-right development is now limited to M1 districts near the City's airports.<sup>5</sup>

In addition to these districts where new hotels are permitted as-of-right, there are certain special districts where new hotels can be located after a site-specific review and CPC approval of a special permit (see **Figure 2-1**).<sup>6</sup> These Special Districts include the following:

- › Clinton
- › Hudson Square

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<sup>4</sup> Hotels with more than 100 rooms require a special permit.

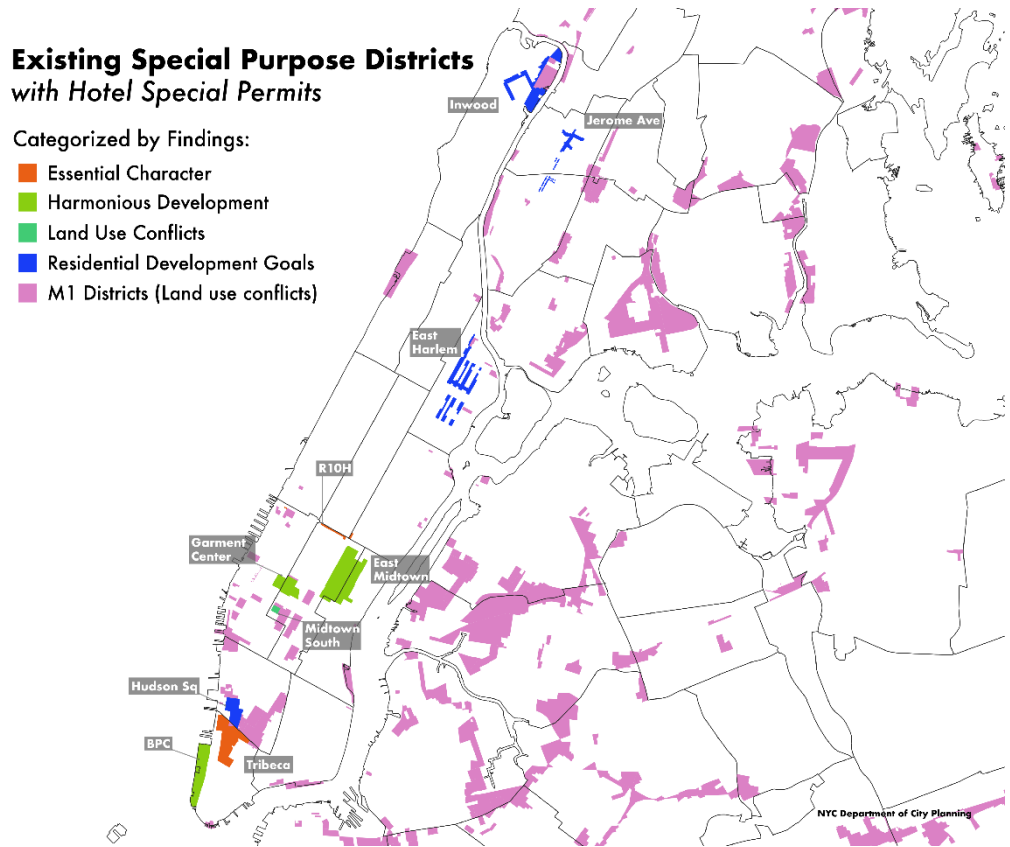
<sup>5</sup> This zoning text amendment includes provisions to exempt hotels in M1 districts operated for the public purpose of temporary housing assistance.

<sup>6</sup> As discussed in Chapter 1, Project Description, the existing special permits have a variety of findings, considerations, and applicability.

- › Tribeca
- › Garment Center
- › Midtown
- › 125th Street
- › East Harlem
- › Jerome Avenue
- › Inwood

In addition, hotels are allowed by special permit in M1 districts, and boatels are permitted in C3 districts by special permit. There is also a hotel special permit proposed as part of the Gowanus Neighborhood Plan.<sup>7</sup>

**Figure 2-1 Existing Special Purpose Districts with Hotels Special Permits**



**Where Hotels are Located**

Hotel development in New York City is influenced by a number of different factors. Proximity to Manhattan, access to public transportation (principally subway lines but also regional rail

<sup>7</sup> Since the application's referral into public review, the Gowanus Neighborhood Plan (C 210177 ZMK), which has a separate hotel special permit applicable in the new Special Gowanus Mixed Use District, has been approved by the Commission. Consistent with its citywide approach, it is anticipated that the Commission will modify the Citywide Hotels Text Amendment to remove this area-specific hotel special permit in the Gowanus area. The provisions of the Citywide Hotels Text Amendment will apply. This change is administrative and would have no implications for the analysis presented in the EIS.

infrastructure), and proximity to airports are often key for hotels that want to be competitive for visitors that want to be able to access tourism destinations or visit family. Neighborhood characteristics such as presence of services and amenities, a significant office or commercial market, and an existing critical mass of hotels are also important factors for hotel developers. Land value and the ability to develop hotels as-of-right without zoning changes are also important considerations when thinking about project financials and timelines.

Prior to 2007, hotels in the city were largely located within the Manhattan Core, with very few hotels located in the outer boroughs. Beginning in 2007, the New York City hotel market experienced a substantial growth in hotel room supply, with 42 percent growth in new hotel rooms since 2010 (see **Figure 2-2**). Much of this growth has happened in areas outside of Manhattan, creating well-established hotel districts in areas of Brooklyn and Queens. While the number of hotel properties in Brooklyn, Queens, the Bronx, and Staten Island continues to grow overall, this growth is concentrated in a relatively small set of submarkets: Long Island City, Downtown Brooklyn/Gowanus, Flushing, Jamaica, Williamsburg/North Brooklyn, and Sunset Park. These submarkets are home to different types of commercial districts, including borough-based business districts, neighborhood commercial areas, regional commercial areas, mixed use commercial districts, and airport districts.

Despite this growth in areas outside of Manhattan, Manhattan remains the largest, most diversified, and most mature hotel market in New York City by a large margin. As of January 2020, Manhattan was home to 81 percent of New York City's hotel rooms and was the only borough in New York City to have hotels of every typology.<sup>8</sup> Since 2010, 75 percent of new hotel rooms that have come online in New York City are located in Manhattan.

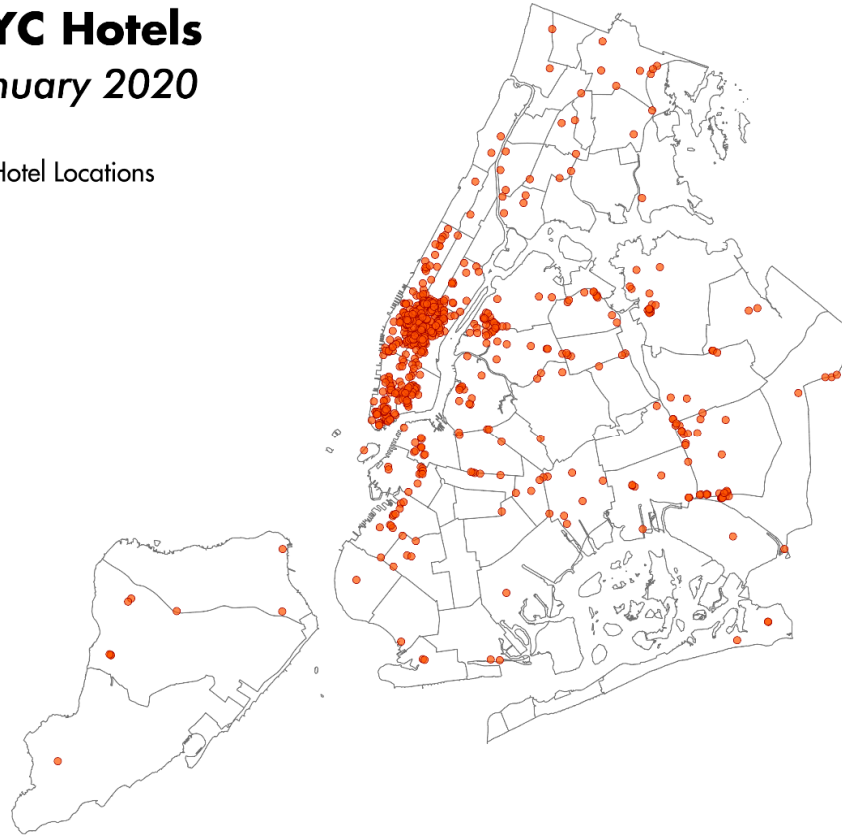
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<sup>8</sup> Hotel typologies relate to the level of service and room rates at different hotels.

**Figure 2-2 NYC Hotels in January 2020**

## NYC Hotels January 2020

● Hotel Locations



NYC Department of City Planning

Source: STR, 2020

Hotels within the Manhattan Core, which is currently zoned with a mix of C4 through C6 districts, tend to be large hotels that are supportive of the City's business sectors, the convention business, and larger public events. In the Midtown and Times Square hotel submarket, 34 new hotels were constructed from 2009 to 2019.

Hotels outside the Manhattan Core in the areas zoned C4 through C6 tend to be smaller on average and offer fewer amenities related to meetings and business activity. These central business districts outside of the Manhattan Core include Downtown Brooklyn, Long Island City, Downtown Jamaica, Downtown Flushing, and 125th Street in Manhattan. Of these districts outside of Manhattan, Jamaica and the Long Island City submarkets have the greatest projected hotel development of all the submarkets.

In neighborhood-based commercial areas, such as C1 and C2 districts in Manhattan neighborhoods like the Upper East Side, Upper West Side, Kips Bay, and Greenwich Village, land use consists of neighborhood retail, local offices, and service uses that support dense residential districts. The hotel market in these districts is relatively slow growing and many are luxury hotels with fewer rooms.

There are also regional commercial areas, many of which are emerging central business districts, primarily characterized by C4 districts in areas like Forest Hills, surrounding Lincoln

Center, Mott Haven, Kings Highway in Brooklyn, and the Staten Island Mall. These districts are mapped outside of central business districts and contain uses like specialty and department stores, theaters, and other commercial office uses that serve a larger region than neighborhood-based commercial areas. While hotels have been permitted in these areas since 1961, recently hotel development has occurred in many of these areas at a rate and scale not previously seen. For example, half of the hotel rooms in the Bronx were built since 2010.

Mixed use commercial districts (MX and C8 Districts), such as those located in Williamsburg and Sunset Park, allow for a mix of uses. Nine of the ten hotels in Sunset Park have opened since 2010. Similarly, the majority of hotels in the North Brooklyn market have been developed in the past 10 years.

While the M1 Hotel Text Amendment was adopted in 2018, there are many hotels located within the City's M1 zoning districts, with over 75 percent of the hotel rooms built in M1 districts outside Manhattan in the past ten years located in just four clusters, excluding JFK Airport. These M1 hotel clusters are Long Island City, Jamaica, North Brooklyn, and Gowanus. Hotels in M1 zoning districts are also concentrated in the areas adjacent to the City's airports. These hotels typically cater to visitors traveling by air.

The areas adjacent to the airports have limited areas for development of hotels and adjoin lower density neighborhoods. They are zoned M1-1 and typically include light industrial uses, such as woodworking shops, repair shops, and wholesale service and storage facilities. These areas are excluded from the M1 Hotels Special Permit.

### No-Action Condition

Under the No-Action condition, existing zoning provisions as they relate to hotels would not change, and new hotels would be able to locate where they are currently permitted either as-of-right or by ~~Special Permits~~special permit.

It is estimated that after recovery from the COVID-19 pandemic, approximately 78,880 hotel rooms will come to market between 2025 and 2035. Of these, it is expected that approximately 2,540 would be in the Bronx, 6,790 would be in Brooklyn, 57,950 would be in Manhattan, 10,940 would be in Queens, and 660 would be in Staten Island. It is assumed that hotels will continue to locate in a pattern similar to that of the past 10 years, which is to concentrate increasingly in already established hotel districts, such as the Manhattan Core, Downtown Brooklyn, and Long Island City. Furthermore, looking at the recent pipeline distribution, the demand for hotels in the outer boroughs is expected to continue to grow and concentrate in areas outside of M1 districts, where a special permit was recently put in place.

### With-Action Condition

The Proposed ~~Actions~~Action would apply to zoning districts where hotels are currently allowed (see **Figure 2-3**):

- › Commercial Districts: C1 (except for C1-1, C1-2, C1-3 or C1-4 Districts), C2, C4, C5, C6, and C8.
- › Mixed Use Districts: MX, paired M1/R districts, M1-6D districts



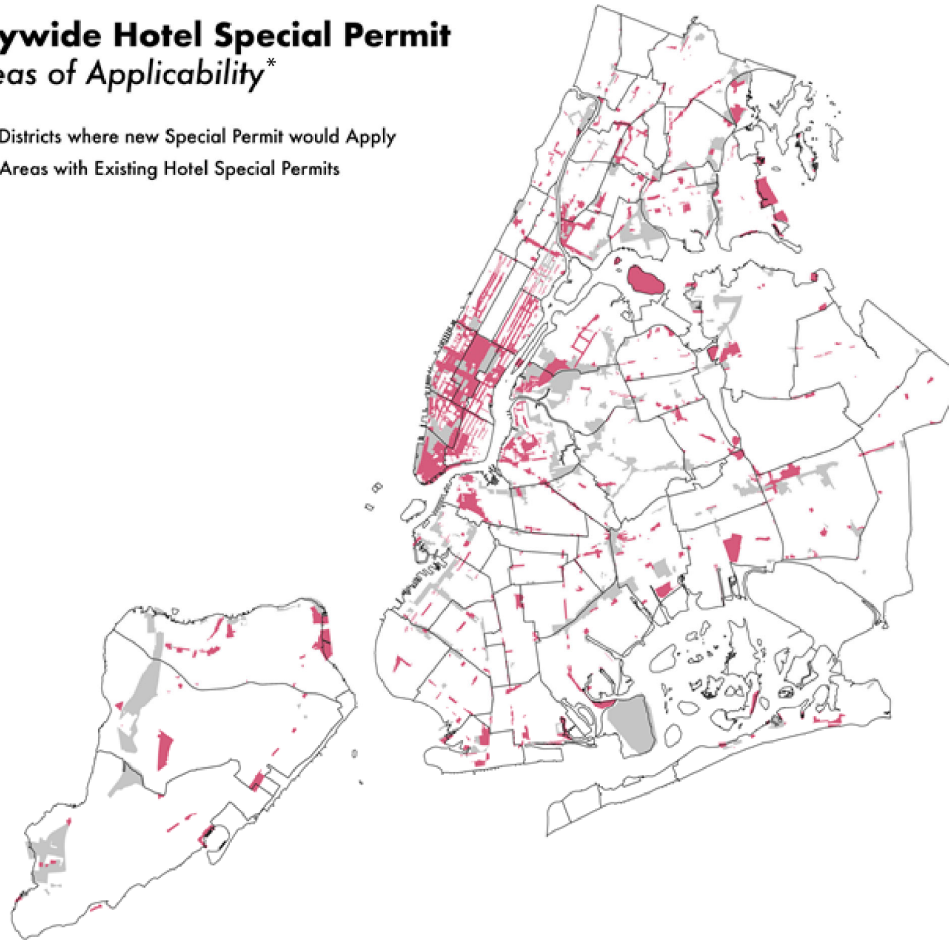
- › Special Districts that have existing special permit requirements for hotels: Clinton, Hudson Square, Tribeca, Garment Center, Midtown, 125th Street, East Harlem, Jerome Avenue, ~~and Inwood, and Gowanus~~
- › All other Special Districts where hotels are currently as-of-right uses

Together these represent the "Area of Applicability" for the Proposed ~~Actions~~Action.

**Figure 2-3 Areas of Applicability**

**Citywide Hotel Special Permit  
Areas of Applicability\***

- Districts where new Special Permit would Apply
- Areas with Existing Hotel Special Permits



Note: \*Any changes to discontinuance provisions would apply citywide; Areas with Existing Hotel Special Permits would also be a part of the Area of Applicability

The Proposed Action introduces a discretionary approval process by CPC ~~special permit~~Special Permit for hotel development within the Area of Applicability. Zoning districts would continue to be governed by the applicable zoning regulations, with the exception that proposed hotels would need to seek a ~~special permit~~Special Permit through the City Planning Commission to locate in a given district. This would result in a disincentive to hotel development that previously was as-of-right, since obtaining the ~~special permit~~Special Permit can add significant time, cost, and uncertainty to a project. It is estimated that 47,070 fewer hotel rooms would be developed by 2035 as compared to the No-Action condition.

The Special Permit would require public review and require all of the potential environmental impacts of a proposed hotel be evaluated. It would result in fewer hotels being developed in commercial districts across the city but would not directly affect existing hotels or other land uses in these districts. **Chapter 3, Socioeconomic Conditions** assesses whether the Proposed Action would displace any businesses or have adverse effects on the hotel industry and secondary industries that are dependent on the hotel industry. According to the analysis of socioeconomic conditions, the Proposed Action would not have the potential to directly displace any land use, nor would it generate new land uses that would either be incompatible with surrounding land uses or conflict with existing zoning or public policy. While the Proposed Action would result in fewer hotels being developed throughout the City in the future under the With Action condition, it would not affect existing hotels. Land uses would continue to be commercial in nature and would not vary greatly from those in existing conditions. Although land uses in these districts may include fewer hotels than there would be in the No-Action condition, it is not expected that this type of land use change would result in adverse impacts to land use or zoning.

The required review of proposed hotel developments would reduce the occurrence of new hotels and encourage development that is consistent with surrounding land uses, reducing land use conflicts.

## Public Policy

### Existing Conditions

#### **OneNYC 2050**

In April 2015, the Mayor's Office of Sustainability and the Mayor's Office of Recovery and Resiliency released OneNYC, a comprehensive plan for a sustainable and resilient city. OneNYC represents a reworking of an earlier sustainability plan developed for the City, known as PlaNYC: A Greener, Greater New York.<sup>9</sup> Like PlaNYC, growth, sustainability, and resiliency remain at the core of OneNYC, but promoting economic equity is a guiding principle throughout the OneNYC plan. OneNYC has since been updated to OneNYC 2050, which was released in 2019 and consists of eight goals and thirty initiatives.

The goals of the plan are to achieve:

- › A Vibrant Democracy through empowering participation, welcoming immigrants, promoting justice and equal rights, and promoting democracy and civic innovation
- › An Inclusive Economy through good paying jobs and job training, economic security through fair wages and benefits, expanded decision making power of workers and communities,
- › Thriving Neighborhoods through affordable housing, access to neighborhood open spaces and cultural resources, community safety, and place-based community planning.

<sup>9</sup> *PlaNYC: A Greener, Greater New York* was first released in 2011 and was developed with policies to address three key challenges that were identified for the City: population growth; aging infrastructure; and global climate change. The plan was updated in 2011 and reorganized around 10 categories: housing and neighborhoods, parks and public space, brownfields, waterways, water supply, transportation, energy, air quality, solid waste, and climate change with corresponding goals and initiatives for each category.

- › Healthy Lives through high quality, accessible health care, addressing health and mental health needs of communities, making healthy lifestyles easier, and designing a healthy physical environment.
- › Equity and Excellence in Education through early childhood education, equity in K-12 opportunity, and increasing integration, diversity, and inclusion in NYC schools.
- › A Livable Climate through carbon neutrality and clean electricity, resilience, economic opportunities through climate action, and climate accountability and justice.
- › Efficient Mobility through modern mass transit, safe and accessible streets, reduced congestion and emissions, and regional and global connections
- › Modern Infrastructure through investments in core physical infrastructure and hazard mitigation, digital infrastructure improvement, and best practices for asset maintenance and capital project delivery.

Specific goals and initiatives related to the Proposed Action include:

- › *OneNYC Goal 2: An Inclusive Economy, Initiative 5: Grow the economy with good-paying jobs and prepare New Yorkers to fill them* commits to investing in businesses and sectors that promise fair wages and working conditions by diversifying the City's economy and broadening access to good paying jobs. In order to support wealth creation and shared prosperity, the City commits to grow worker-owned businesses and enable workers and labor unions to have more say and decision-making power. This initiative specifically calls out the tech, green jobs, health care, industrial, and creative industries as targets for investment and diversification of the economy. Indicators include total employment and labor force participation rate.
- › *OneNYC Goal 3: Thriving Neighborhoods, Initiative 12: Promote place-based, community driven planning and strategies* highlights the need for the City to have a planning approach that gives communities a voice, values local knowledge, and ensures plans are guided by an equity imperative.

### ***New York Works: Creating Good Jobs***

*New York Works: Creating Good Jobs* is a NYC plan published in 2020 by the Deputy Mayor for Housing and Economic Development. The plan aims to create 100,000 good paying jobs over 10 years through direct City actions with strategies around Tech, Life Sciences and Healthcare, Industrial and Manufacturing, Creative and Cultural Sectors, and Space for Jobs of the Future. In addition, the City notes it will continue to support the 375,000 jobs that the tourism industry and visitor spending support, through investments in culture, entertainment, and attractions across the five boroughs. The plan notes that hotel demand has grown and generates nearly 35 million hotel room nights sold, with an estimated \$1 billion in revenue to the city in 2020. The plan states that the City will continue to support the sector through marketing campaigns targeted at international tourists, the Nonstop NYC program that includes Restaurant Week, Broadway Week, Off-Broadway Week, and Attractions Week.

### ***New York City & Company***

New York City funds tourism promotion and research through NYC & Company, the official destination marketing organization and convention and visitors bureau for the five boroughs of New York City. It is funded through City Contract Funds of \$20.9 million, as of the most

recent reporting, as well as other funding from sponsorships, publications, and more. NYC & Company promotes visitation through marketing campaigns globally and produces research on the hotel and tourism industry.

### ***New York State Programs***

New York State prioritizes investment in major tourism infrastructure projects, including Penn Station, John F Kennedy International Airport, LaGuardia International Airport, the Van Wyck Expressway, and Kew Gardens Interchange, to ensure visitors have first-rate transportation options.

Market New York is a grant program established to strengthen tourism and attract visitors to New York State by promoting destinations, attractions, and special events. The New York Department of Economic Development also hosts I Love New York, a resource for travelers to New York.

### ***Adaptive Reuse Affordable Housing Program***

The Fiscal Year 2022 New York State budget included \$100 million for adaptive reuse of commercial and hotel properties located in New York City to create permanent affordable housing under the Adaptive Reuse Affordable Housing Program as administered by the Division of Housing and Community Renewal (HCR).<sup>10</sup> ~~There is no established policy with standards for these conversions at this time, but various~~ Various bills have been introduced to the state legislature with proposals for the conversions of properties and standards of affordability. The Housing Our Neighbors with Dignity Act (HONDA), a bill introduced by Senator Giannaris in March, was signed to law by Governor Cuomo August 16, 2021, and allows the state to finance the acquisition and/or conversion of distressed properties and convert them for low-income housing.<sup>11</sup>

### ***Waterfront Revitalization Program***

Since the Proposed Action applies citywide, portions of the Affected Area are located within the Coastal Zone Boundary. The WRP is the City's principal coastal zone management tool and establishes a broad range of public policies for the City's coastal areas. The guiding principle of the WRP is to maximize the benefits derived from economic development, environmental conservation, and public use of the waterfront, while minimizing the conflicts among these objectives. The WRP was originally adopted in 1982. Subsequent revisions include incorporation of climate change and sea level rise considerations to increase the resiliency of the waterfront area, promotion of waterfront industrial development as well as commercial and recreational waterborne activities, increased restoration of ecologically significant areas, and best practices for the design of waterfront open spaces.

### **No-Action Condition**

In the future No-Action condition, it is expected that the policies described above will continue.

<sup>10</sup> <https://www.budget.ny.gov/pubs/press/2021/fy22-enacted-budget-highlights.html>

<sup>11</sup> <https://www.nysenate.gov/newsroom/press-releases/michael-gianaris/senate-deputy-leader-gianaris-assembly-member-reyes-honda>

As discussed above under Existing Conditions, it is possible that bills related to the Adaptive Reuse Affordable Housing Program may be passed. However, the details of the legislation are not known at this time.

### **With-Action Condition**

The below assessment analyzes whether the Proposed Action would impact relevant public policies. **Chapter 3, Socioeconomic Conditions**, identified that the reduction of hotel rooms anticipated in the With-Action condition would result in an adverse impact to the hotel and tourism industries. However, as discussed below, the Proposed Action would not hinder the ability to enact the initiatives outlined in the public policies described below.

#### **OneNYC 2050**

As discussed above, there are two OneNYC initiatives that are related to the Proposed Action. *OneNYC Goal 2: An Inclusive Economy, Initiative 5: Grow the economy with good-paying jobs and prepare New Yorkers to fill them*, is related to growth in businesses and sectors that promise fair wages and working conditions by diversifying the City's economy and broadening access to good paying jobs. The Goal also strives to enable workers and labor unions to have more say and decision-making power. *OneNYC Goal 3: Thriving Neighborhoods, Initiative 12: Promote place-based, community driven planning and strategies* also discusses decision making power, as it highlights the need for the City to have a planning approach that gives communities a voice, values local knowledge, and ensures plans are guided by an equity imperative.

As identified in **Chapter 3, Socioeconomic Conditions**, the reduction of hotel rooms anticipated in the With-Action condition is estimated to correspond to a loss of jobs and wages generated by the hotel and tourism industries. Although the Proposed Action would slow the growth in jobs in the hotel and tourism industries, it would not affect existing hotels or the businesses that serve the City's visitors. The destinations and anchor institutions within the City will continue to draw visitors and generate visitation, economic activity, and jobs. The Proposed Action would hinder the hotel and tourism industries' ability to grow, but would not adversely impact overall job growth in the city or the sectors that the plan specifically calls out (tech, green jobs, health care, industrial, and creative industries). The Proposed Action would allow for public review of hotel development, which would allow for placed-based input. Therefore, the Proposed Action would not conflict with the Thriving Neighborhoods and Inclusive Economy initiatives of OneNYC.

#### **New York Works: Creating Good Jobs**

The Proposed Action would not impact the City initiatives and funding to support job creation. The City will continue to invest in the targeted industries referenced in the plan to create jobs, and will continue to fund programs in culture, entertainment, and attractions across the five boroughs and conduct marketing campaigns to attract visitors.

#### **New York City & Company**

The Proposed Action would not adversely impact the funding of NYC & Company. New York City will continue to fund NYC & Company and support their efforts to promote visitation.

### ***New York State Programs***

The Proposed Action would not adversely impact the funding of New York State investment in major tourism infrastructure projects. New York State will continue to fund these projects as well as those to strengthen tourism and promote resources for travelers.

### ***Adaptive Reuse Affordable Housing Program***

As discussed above, ~~bill~~the HONDA bill to enact the policy surrounding the Adaptive Reuse Affordable Housing Program ~~have not~~was passed ~~yet. However, the~~in August. The Proposed Action would not preclude the Adaptive Reuse Affordable Housing Program from being implemented. Furthermore, it is not expected that this program would change the Analysis Framework of the Proposed Action, which assumes that only 75 percent of January 2020 hotel supply will remain in the inventory post-pandemic. This is conservative especially given that the June 2021 inventory has surpassed these estimates, and accounts. Furthermore, it is likely that the program will purchase permanently or temporarily closed hotel rooms. As outlined in Chapter 1, Project Description and the New York City Hotel Market Analysis in Appendix B, there are many permanently closed hotels, and it is not expected that this program will provide an incentive for further closures.

### ***Waterfront Revitalization Program***

The Proposed Action would not induce any development. However, because the Proposed Action would be applicable to zoning districts within the Coastal Zone, it is evaluated in this section for its consistency with the Waterfront Revitalization Program policies. The NYC WRP Consistency Assessment Form for the ~~proposed action~~Proposed Action (WRP #21-060, see **Appendix C**), was completed to identify the extent to which the proposed action may promote or hinder the achievement of certain WRP policies. Based on a review by DCP's Waterfront and Open Space Division of the assessment contained within the Consistency Assessment Form, it was determined that, overall, the ~~proposed action~~Proposed Action would support the applicable policies and is therefore consistent with the NYC Waterfront Revitalization Program.