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Neighborhood Character

This section considers how the Proposed Action would affect neighborhood character, which is defined as the elements of the environment that combine to create the context and feeling of a neighborhood.

Introduction

This chapter assesses the Proposed Action's potential effects on neighborhood character. The *2020 CEQR Technical Manual* defines neighborhood character as an amalgam of the various elements that give neighborhoods their distinct personality. These elements can include land use, socioeconomic conditions, open space, historic and cultural resources, urban design and visual resources, shadows, transportation, and/or noise, but not all of these elements contribute to neighborhood character in all cases. For neighborhood character, CEQR considers how those elements combine to create the context and feeling of a neighborhood, and how an action would affect that context.

According to the *CEQR Technical Manual*, neighborhood character impacts are rare, and it would be unusual that, in the absence of a significant adverse impact in any of the relevant technical areas, a combination of moderate effects to the neighborhood would result in an impact to neighborhood character. Moreover, a significant impact identified in one of the technical areas that contribute to a neighborhood's character is not automatically equivalent to a significant impact on neighborhood character, but rather serves as an indication that neighborhood character should be examined.

Principal Conclusions

The Proposed Action would not result in a significant adverse impact on neighborhood character. As discussed throughout this chapter, the commercial districts of the city have varied neighborhood context in terms of their land uses, the types of commercial activity they support, and their pedestrian and vehicular activity.

Using methodologies outlined in the *CEQR Technical Manual*, the preliminary assessment evaluated the expected changes resulting from the Proposed Action in the following technical areas: land use, zoning, and public policy and socioeconomic conditions. The assessment used the findings from the respective chapters of this EIS to identify whether the Proposed Action would result in any significant adverse impacts or moderate adverse effects in these technical areas, and whether any such changes would have the potential to affect the defining features of neighborhood character.

Of the relevant technical areas specified in the *CEQR Technical Manual*, the Proposed Action would not cause a significant adverse impact to land use, zoning, or public policy, but would cause significant adverse impacts regarding socioeconomic conditions. However, the significant adverse socioeconomic impact would not result in a significant adverse impact to neighborhood character. It is expected that the commercial and visitor activity that currently characterizes the commercial districts throughout the city would continue to contribute to the local neighborhood character under the With-Action condition. Furthermore, just as potential significant adverse impacts in the relevant technical areas would not affect any defining feature of neighborhood character, no moderate adverse effects that would affect such defining features—either singularly or in combination—have been identified.

Therefore, based on the results of the preliminary assessment, a detailed assessment is not warranted, and the Proposed Action would not have a significant adverse neighborhood character impact.

Methodology

The *CEQR Technical Manual* states that an assessment of neighborhood character is needed when a proposed project has the potential to result in significant adverse impacts in any of the following technical areas: land use, zoning, and public policy; socioeconomic conditions; open space; historic and cultural resources; urban design and visual resources; shadows; transportation; or noise. An assessment may also be appropriate if the project would result in a combination of moderate effects to several elements that cumulatively may affect neighborhood character. According to the *CEQR Technical Manual*, a “moderate” effect is generally defined as an effect considered reasonably close to the significant adverse impact threshold for a particular technical analysis area.

The Proposed Action is a generic action, and, therefore, there are no known potential or projected development sites. The introduction of a CPC ~~special permit~~ Special Permit for new hotels citywide would result in fewer hotels being developed in the future across districts citywide, and it is not possible to predict the locations of future hotels that would seek the proposed ~~special permit~~ Special Permit. It is also assumed that commercial districts citywide will continue to develop with uses that are permitted as-of-right, and that the Proposed

Action would not otherwise change any rules regulating development in these districts. The *CEQR Technical Manual* states that when large areas would be affected by generic actions, the analysis of neighborhood character should consider neighborhoods typical of those that would be affected.

As described in the relevant chapters of this EIS, the Proposed Action would result in a significant adverse impacts to socioeconomic conditions, but would not result in adverse impacts to land use, nor result in adverse effects to the other technical areas that contribute to neighborhood character.

Determination of Significance

According to the *CEQR Technical Manual*, an understanding of the key elements that define neighborhood character, and their relationships to one another, forms the basis for determining impact significance. Usually, significant change to one of the determining elements of neighborhood character would result in a significant impact on neighborhood character. If an examination of one of the technical areas that may contribute to neighborhood character determines that there would be a significant impact, then a significant impact to neighborhood character might occur. Because a neighborhood's character is perceived and contextual, a judgment of significant impact may be subjective.

Preliminary Assessment

Defining Features

As described in **Chapter 2, Land Use, Zoning, and Public Policy**, there are many commercial districts and neighborhoods in New York City where hotels are currently allowed as-of-right and that are within the Affected Area of the Proposed Action. The most mature hotel market in the City is the Manhattan Core. In the past decade, hotel markets have also grown substantially in central business districts, neighborhood-based commercial areas, regional commercial areas, and mixed-use commercial districts outside of the Manhattan Core. Example neighborhoods within each type of these commercial districts include:

- › Manhattan Core Midtown West, Midtown East, Soho/Chelsea, and the Financial District
- › Central business districts: Long Island City, Downtown Brooklyn, Downtown Jamaica, and Downtown Flushing.
- › Neighborhood-based commercial areas: Upper East Side, Upper West Side, parts of Midtown East, Kips Bay, and Greenwich Village.
- › Regional commercial areas: Forest Hills, Mott Haven, Kings Highway in Brooklyn, and New Springville
- › Mixed-Use Commercial Districts: Sunset Park and Williamsburg

A general discussion of the defining characteristics of these neighborhoods that are relevant to hotel development is discussed below.

Manhattan Core

The neighborhoods in the Manhattan Core have varying neighborhood character but are largely characterized by a predominance of commercial development, including high rise office buildings, major retailers, hotels, and entertainment facilities. These large uses are supported by major transportation infrastructure, including the regional railroads and the City's subway system. The Manhattan Core supports much of the economic activity of the city and is a destination and place of residence for many of New York's workers, students, and visitors. It also contains many anchor institutions that visitors to the City frequent—such as museums, theaters, parks, historic resources, iconic restaurants or markets, and shopping districts. There are high levels of pedestrian activity and vehicular traffic, which contribute to relatively high ambient noise, which is typical of dense urban areas and central business districts. Major streets and avenues in the Core serve as important pedestrian corridors, and pedestrian flow tends to crowd near subway entrances, bus stops, store entrances, and sidewalk food carts and kiosks. Transit activity is also very high and crowded at peak times of day from the major transportation hubs and subway stations around major business districts. As discussed in **Chapter 1, Project Description**, this is also the commercial area that has experienced the most hotel closures due to the COVID-19 Pandemic.

Central Business Districts

Central Business Districts outside the Manhattan Core are characterized by good regional transportation access, with access to Manhattan as well as regions outside of the five boroughs. Long Island City and Downtown Brooklyn have multiple subway lines as well as the Long Island Rail Road. Downtown Jamaica and Downtown Flushing also have access to the Long Island Rail Road, and Jamaica also connects to the Air Train to JFK. These business districts also have mixed-use commercial development like that of the Manhattan Core but, while dense, are at smaller scales that cover smaller areas than the commercial development within the Manhattan Core. These areas are accessible to both regional transportation, airports, and Manhattan, which makes them destinations for borough residents and visitors. There are high levels of pedestrian activity and vehicular traffic in these central business districts, which contribute to relatively high ambient noise. Many of these districts are also intersected by major roadways and bridges that connect to the other boroughs and the outer region, which contribute to high vehicular traffic but also make them conducive to robust commercial activity. Over the last 10 years, much of the growth in hotel development outside Manhattan has taken place in these types of commercial areas.

Neighborhood-Based Commercial Areas

Neighborhood-based commercial areas are characterized by neighborhood retail, local offices, and service uses co-located with dense residential districts. Residential development in these areas is often a mix of high-rise residential with ground floor retail on avenues and low-rise row houses or brownstones on the streets. Larger commercial uses such as hotels might locate near major destinations such as Central Park and major cultural institutions. These districts are mapped outside of central business districts and have good access to central business districts through local subway routes. Hotels have located in these neighborhoods more frequently because of their connectivity to the rest of the City, but there are fewer tourism related services in these neighborhoods. There are lower levels of pedestrian activity and vehicular traffic in these neighborhoods and lower ambient noise.

Regional Commercial Areas

Regional commercial areas are largely characterized by a commercial center with regional serving retail based around a major thoroughfare or commercial mall that is easily accessible to the region by car and at times by regional rail. Some examples of commercial malls that characterize these areas are the Bronx Terminal Market, the Staten Island Mall, or the Rego Center. Neighborhoods in these commercial areas typically have large department stores and large grocery stores with large parking lots. Other regional or local retail also locates in these areas to form the commercial district.

Mixed Use Commercial Districts

Mixed use commercial districts are typically characterized districts that were historically mixed with manufacturing and residential. They have a mix of mid density residential uses alongside light manufacturing or light industrial uses and are often increasingly residential in nature. Some residents and workers in these neighborhoods may have good local transit access, but large portions of these neighborhoods may be considered transit deserts due to their historic development patterns and location far from the subway. These neighborhoods experience some traffic and noise from their manufacturing uses and pedestrian traffic along central corridors.

No-Action Condition

There are many factors in the City that contribute to its growth and development over time and that influence neighborhood character—including, but not limited to, the economy, public policy, incentive structures, transit access, land value and availability, and capital projects. It is difficult to predict how neighborhoods in the Affected Area will change, but it is a reasonable assumption that under the No-Action condition they would continue to grow in a similar development pattern to that of recent history.

Within the Manhattan Core and other central business districts, where many hotels are already located and there are many businesses catering to tourism-based services, continued location of hotels in these districts under the No-Action condition could lead to a concentration of hotels. This might skew economic activity in the No-Action condition toward tourism-based services, potentially affecting the character and mix of uses in the surrounding area where a better balance between local residential character and diverse business environment is desired.

In less-centrally-located commercial areas, hotels may change the local commercial character as well. The character and services in these neighborhood-based commercial districts could become less oriented around local-serving businesses and more oriented to tourism-serving businesses. Tourist-serving businesses tend to operate with longer hours and can create additional noise and traffic during evening hours. If hotels continue to locate in areas like MX districts that are heavily residential in character, they may also add traffic and parking congestion to areas already experiencing high congestion.

With-Action Condition

The sections below discuss potential changes resulting from the Proposed Action in the technical areas of land use, zoning, and public policy and socioeconomic conditions that are considered in a neighborhood character assessment under CEQR. In the areas of open space; historic and cultural resources; urban design and visual resources; shadows; transportation; and noise, the Proposed Action would not induce development beyond what is allowed as-of-right and would therefore not have the potential to have moderate effects that may impact neighborhood character as shown in the EAS. The assessment uses the findings from the respective chapters of this EIS to identify whether the Proposed Action would result in any significant adverse impacts or moderate adverse effects in these technical areas.¹

Also discussed below is the potential for the Proposed Action to affect the defining features of neighborhood character in neighborhoods typical of those that would be affected.

Land Use, Zoning, and Public Policy

Development resulting from a proposed action could alter neighborhood character if it introduces new land uses, conflicts with land use policy or other public plans for the area, changes land use character, or generates significant land use impacts.

As described in **Section 2, Land Use, Zoning and Public Policy**, no significant adverse impacts related to land use, zoning, or public policy would occur. The Proposed Action would not 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. Some neighborhoods in the City, particularly Manhattan Core neighborhoods with many tourist attractions and tourism-based services, are characterized by these tourists and the hotels where they stay. While the Proposed Action would result in fewer hotels being developed throughout the City in the future, it would not affect existing hotels in these neighborhoods. 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 impacts to neighborhood character.

The Proposed Action would require new hotels to receive a ~~special permit~~ Special Permit but would not affect existing hotels. The Proposed Action would encourage new hotel development that is consistent with existing neighborhood character and land use through future environmental review of proposed hotel developments. The Proposed Action would not directly or indirectly displace any existing hotels or other commercial land uses or change the existing land uses of any neighborhood. Furthermore, it would not change public policy as it relates to public plans or spending by the City or State of New York.

¹ The 2020 *CEQR Technical Manual* also recommends analysis of a proposed action's potential to affect the "defining features" of a neighborhood. Because the Proposed Action is a generic action, it is not possible to provide an assessment of a neighborhood's defining features as the Proposed Action would affect commercial districts Citywide. However, in the future with the Proposed Action, new hotels that would be developed would undergo environmental review and be assessed for their impacts to localized neighborhood character.

Socioeconomic Conditions

Defining features of the neighborhood would not be adversely affected due to potential effects of the Proposed Action on socioeconomic conditions, either singularly or in combination with potential impacts in other relevant technical areas discussed in this section.

As described in **Chapter 3, Socioeconomic Conditions**, the Proposed Action would result in significant adverse impacts in this technical area. The Proposed Action would lead to a reduction in the number of hotel rooms and, therefore, visitors as compared to the No-Action condition that has the potential to significantly impact the hotel industry and secondary industries. The loss of rooms would substantially affect the hotel and tourism industries' ability to grow and meet future anticipated demand. Assessments of direct and indirect residential displacement was not warranted because the Proposed Action would not directly displace residents or businesses nor introduce a development trend that could result in changing socioeconomic conditions for existing residents or businesses.

The hotel industry and secondary industries would be expected to see a lower hotel room inventory in the With-Action condition, thereby resulting in a reduction of both visitors to New York City and economic activity generated by the industry. However, it is not expected that these changes would lead to a significant adverse impact to neighborhood character. Commercial areas in certain parts of the City, such as the Manhattan Core, have seen permanent closures of hotel rooms, and even greater temporary hotel room closures due to the COVID-19 Pandemic. While these areas may not regain the same number of rooms as they had in January 2020, it is not expected that the reduction of rooms between the No-Action and With-Action conditions would lead to changes in neighborhood character. On sites where future hotel development could locate in the No-Action condition, it is expected that other as-of-right commercial development would be developed consistent with zoning regulations. Furthermore, the destinations and anchor institutions within these districts will continue to draw visitors and generate economic activity. Moreover, under the With-Action condition, the inventory of hotel rooms is expected to reach 2020 levels by 2035, which can be assumed to support the record 66.6 million visitors that then came to New York City. Therefore, it is expected that the commercial and visitor activity that currently characterizes these areas would continue to contribute to the local neighborhood character. Therefore, although there would be a significant adverse impact to the hotel industry under socioeconomic conditions, this would not result in changes to neighborhood character to such a sufficient level that would constitute an adverse impact.