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Mitigation

In accordance with the *City Environmental Quality Review (CEQR) Technical Manual*, where significant adverse impacts are identified, mitigation measures are developed and evaluated to reduce or eliminate the impacts to the fullest extent practicable.

Prototypical Analyses

As detailed in **Chapter 1, "Project Description,"** DCP is proposing a zoning text amendment to establish a CPC special permit for new hotel development in M1 districts citywide except those areas that are airport property and non-residential areas adjacent to airports. The principal effect of the proposed action is to affect the location, but not the amount or type, of future hotel development.

The introduction of a CPC special permit for new hotels in M1 districts could result in shifting hotel development from M1 districts to other locations where they will continue to be permitted as-of-right, but it would not otherwise change any rules regulating development in these locations. Since it is not possible to evaluate the impacts of any specific development as the specific location of future development projects is unknown, the various EIS analyses are based on prototypical sites.

The prototypical sites are assessed to describe the possible effects of shifting from one use (such as residential or a different commercial use) in the No-Action

condition to a commercial hotel use in the With-Action condition. Since the proposed action would not change any rules regulating as-of-right development outside of M1 districts, such effects or differences would not be evaluated as, or considered to be, significant adverse impacts under CEQR guidelines. As a consequence, no mitigation measures are warranted.

Conceptual Analyses

The proposed action, as noted above, would create a new discretionary action under the NYC Zoning Resolution—i.e., a special permit to allow new hotels within M1 districts—so an environmental assessment was warranted to determine the potential for significant adverse impacts that could result from a hotel development in a M1 district pursuant to the special permit. However, because it is not possible to predict whether a special permit would be pursued on any one site in the future, a conceptual analysis was conducted, as found **in Chapter 23, “Conceptual Analysis,”** to understand how the new special permit could be utilized and to generically assess the potential environmental impacts that could result from a hotel development in a M1 district pursuant to the special permit.

The conceptual analysis identified significant adverse impacts could potentially occur at the conceptual development site for in regard to historic resources, hazardous materials, and air quality. Mitigation measures to address the potential historic resources impacts cannot be identified at this time as the measures are dependent on site-specific conditions. Hazardous materials and air quality impacts could be avoided by the adoption of an E-designation at the time the hotel special permit was approved.

No significant adverse impacts related to land use, zoning and public policy or urban design and visual resources could be realized, as a new hotel development seeking a special permit to operate in an M1 district under the proposed action would need to meet the findings of this special permit.

Although the conceptual analysis did not identify the potential for significant adverse impacts in the other impact categories, the potential for impacts in those categories cannot be ruled out for a new hotel development at a location within M1 districts. As such, any application for a special permit hotel development would need to assess and, if warranted, disclose significant adverse impacts. Possible mitigation measures would then be considered pursuant to a separate environmental review.