20.1. INTRODUCTION

This chapter assesses the Proposed Action's potential effects on neighborhood character. The 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.

20.2. PRINCIPAL CONCLUSIONS

The Proposed Action would not result in significant adverse impacts on neighborhood character. A screening analysis of neighborhood character concluded the Proposed Action would not result in significant adverse impacts on the following technical areas that comprise the elements that make up neighborhood character: land use, open space, historic and cultural resources, urban design and visual resources, shadows, transportation and noise. While the Proposed Action would not result in significant adverse impacts with respect to socioeconomic conditions, the effects would not raise the potential to significantly impact neighborhood character.

20.1. 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 there are no known potential or projected development sites and, due to its broad applicability, it is difficult to predict the sites where development would be

facilitated by the Proposed Action. To produce a reasonable analysis of likely effects of the Proposed Action, four representative development prototypes have been established to assess the potential for significant adverse impacts in those technical areas mentioned above. As described in the relevant chapters of this EIS, the Proposed Action would not result in significant adverse impacts in most technical analysis areas, but has the potential to result in significant impacts in socioeconomics. Based on the methodology provided in the *CEQR Technical Manual*, a screening analysis was conducted to determine the Proposed Action's effects on neighborhood character. Although the Proposed Action would not result in significant adverse impacts on land use, the screening analysis considers the Proposed Action's impact on land use as well as socioeconomics to most appropriately assess the combination of effects on relevant technical areas.

20.2. PRELIMINARY SCREENING

20.2.1. Land Use

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. The Designated Areas are composed of only M1, M2 and M3 districts, which allow industrial and manufacturing uses, most commercial uses and some community facility uses. New residential development is not allowed within Designated Areas. Although the neighborhood character varies across and within Designated Areas, many of the businesses generate truck traffic, noise, odors or emissions, require relatively large sites, and are incompatible with residential and high density commercial or community facility development. More than 60 percent of all lot area in the Designated Areas in M districts is classified as industrial/manufacturing or utilities/transportation.

Land uses within the C8 and M districts outside Designated Areas include a mix of transportation and utilities, residential, industrial, and commercial uses, vacant land, and parking facilities. In terms of land area, lots with transportation and utility uses comprise more than 39 percent of M and C8 districts in Non-Designated Areas. Approximately 3.5 percent of the indirectly affected areas are mapped as mixed use M1 districts, which permit residential uses in addition to commercial and light manufacturing. In addition, approximately 6.3 percent of the indirectly affected area is mapped as C8 districts, which permit commercial uses as well as semi-industrial, including automotive uses and other services, such as custom woodworking and welding shops.

As described in Chapter 1 "Project Description" the Proposed Action would affect zoning regulations in all Designated Areas in M districts by creating a CPC Special Permit for the development of self-storage. However, the Proposed Action would not affect the underlying zoning of either the Designated Areas or the C8 and M districts outside of Designated Areas. The Proposed Action would not introduce new land uses that would conflict with the existing land uses or change the neighborhood character, but rather, it would help ensure that job-intensive industrial uses that currently exist in Designated Areas are able to remain. Therefore, the Proposed Action would not change the character of neighborhoods within Designated Areas.

Within C8 and M districts outside Designated Areas, the Proposed Action is expected to result in four more self-storage facilities by 2027. Since these areas already permit self-storage development, and these uses are compatible with the surrounding mix of industrial, commercial, residential and other land uses,

the Proposed Action would not significantly change the character of neighborhoods within Non-Designated Areas.

20.2.2. Socioeconomic Conditions

Changes in socioeconomic conditions have the potential to affect neighborhood character when they result in substantial direct or indirect displacement or addition of population, employment, or businesses; or substantial differences in population or employment density. The Proposed Action does not have the potential to result in direct or indirect residential displacement. The Proposed Action will continue to allow existing self-storage facilities to operate, and therefore does not have the potential to directly displace any businesses.

In evaluating indirect business displacement, it is possible that the Proposed Action may have the effect of constraining the ability of the self-storage industry to respond to demand for self-storage units in some submarkets, resulting in higher rental rates for some businesses that rely on self-storage units. Some businesses may also have to travel further to access units in the desired price range or rent smaller units, resulting in some inconvenience. Furthermore, there may be a shift in customer demand. However, the Department of City Planning does not have evidence that any specific category of business relies disproportionately on the services provided by self-storage, nor is there evidence to suggest that shifts in costs or customer demand would impair the needs of businesses to such a degree that the Proposed Action would result in an adverse impact on neighborhood character. Furthermore, since the Proposed Action is designed to ensure that large sites suitable for more job-intensive industrial uses remain available for industrial businesses, it is expected that the Proposed Action would aid the kinds of businesses and uses that already exist in the Designated Areas in M Districts to remain or site in these areas, thereby reinforcing the existing neighborhood character. As such, the Proposed Action does not have the potential to cause indirect business displacement.

As described in Chapter 4 "Socioeconomic Conditions" the Proposed Action has the potential to significantly affect business conditions in the self-storage industry or to impair the economic viability of this industry. The Analysis Framework projected an additional eighty-six new self-storage facilities in NYC within the next decade under the No-Action Condition, whereas the With-Action Condition projected a total of eighty-one new self-storage facilities. This represents five fewer facilities citywide in the With-Action Condition as compared to the No-Action Condition. The Proposed Action is also expected to influence the distribution of new self-storage development, with nine fewer facilities projected in Designated Areas in M Districts and four additional self-storage facilities projected in C8 and M districts outside Designated Areas. Based on available information and statements from the self-storage industry, it cannot be excluded that the proposed CPC Special Permit could hamper the self-storage industry's ability to grow in New York City, resulting in a determination that the Proposed Action has the potential to significantly affect business conditions in the self-storage industry.

While the Proposed Action has the potential to result in significant adverse impacts on business conditions in the self-storage industry, this is not likely to result in significant adverse impacts in terms of Neighborhood Character. Self-storage facilities are currently permitted and exist in C8 and M districts outside of Designated Areas and the Proposed Action is anticipated to result in four new facilities in C8 and M districts outside of Designated Areas *citywide*. Given the number of new anticipated self-storage

facilities in C8 and M districts outside of Designated Areas, the citywide scale at which this increase is being considered, and the fact that self-storage facilities are already allowed in C8 and M districts outside of Designated Areas, the Proposed Action is not likely to result in significant adverse impacts with respect to neighborhood character. Furthermore, the potential for the Proposed Action to result in approximately nine fewer self-storage facilities in Designated Areas in M Districts, which would help ensure that sites suitable for industrial uses remain available for industrial businesses, would not hinder and would likely reinforce the neighborhood character of these areas. Therefore, Proposed Action would not significantly change the character of neighborhoods within Designated Areas in M Districts or Non-Designated Areas in M and C8 Districts and further consideration under a preliminary analysis is not warranted.