

24. CONCEPTUAL ANALYSIS

24.1. INTRODUCTION

This FEIS includes a Conceptual Analysis to assess potential environmental impacts that could result if a Special Permit is obtained to build a self-storage facility within the Designated Areas in M Districts. Approval of such a Special Permit would be subject to discretionary approval and any environmental impacts associated with such action would be assessed and disclosed pursuant to a separate project-specific, environmental review. However, to disclose the possible environmental impacts of such a self-storage facility, analyses were conducted on a conceptual and generic basis. The prototypes used to illustrate the consequences of a CPC Special Permit being granted are examples, which DCP believes would meet the findings of the proposed Special Permit. If a site would not meet the findings, the application would not receive the Special Permit and the facility would not be built.

The With-Action Condition for the Proposed Action includes nine self-storage facilities in Designated Areas in M Districts that would be built by applying for the proposed CPC Special Permit. This conceptual analysis cannot attempt to analyze every possible scenario under which a CPC Special Permit could be granted, since too many variations and possibilities exist. However, this analysis does present prototypes, by means of which the technical analyses may be conducted. These prototypes will be plausible cases for future Special Permit applications, and are representative of the future possibilities for self-storage development by CPC Special Permit in Designated Areas in M Districts.

Since the Proposed Action is a restriction, and a self-storage facility would be allowed as-of-right in the Future-No-Action Condition, the Special Permit application in the With-Action Condition effectively presents a subset of the possible as-of-right developments under the No-Action Condition. Consequentially, the range of possibilities are like those that guided the selection of prototypes in the Analysis Framework.

24.2. DISCUSSION OF PROTOTYPES

Two prototypes were developed for the Conceptual Analysis for CEQR analysis purposes. These prototypes were based on existing trends and reasonable projections for the future. These reasonable projections regard the type of locations self-storage developers have typically sought out: larger sites near transit and highways, enjoying a high degree of visibility, in relatively densely populated areas.

24.2.1. Prototype A

This prototype, as shown in the illustrative example, utilizes a generic 20,000 sq. ft. corner lot on a narrow street with two travel lanes. Access to a truck route is a handful of blocks away. The prototype is located in a M1-4 district, near the edge of a Designated Area in an M District and across from a medium-density residential district, which has a diverse mix of building types and heights, but none exceed 70 feet in height.

The Department of City Planning would expect such a site to be granted a Special Permit, due to the moderate size of the proposed lot, the relatively large distance from the truck route and the presence of residential and commercial uses in the immediate vicinity of the proposed site. These conditions would

make the site impractical for an industrial use, because a future industrial use would likely create certain land use conflicts with the residential and commercial uses in the immediate surrounding of the site.

There are a number of neighborhoods or Designated Areas in M Districts where this prototype could be located, but for the purpose of this analysis, it will be assumed that the prototype is located in East New York, a neighborhood in Brooklyn.

In the No-Action Condition, the site could be used as a single-story warehouse and wholesale facility. It has 11 employees.

As represented by the massing in the With-Action Condition the prototype has a Zoning Floor Area of 40,000 sq. ft. and a Gross Floor Area of 64,000 sq. ft., which includes two required loading berths and one cellar level. One parking space is provided. The facility is three stories high, with a building height of 40 feet.

This prototype is considered to be representative of new construction self-storage facilities subject to the CPC Special Permit in Designated areas in M Districts with a Floor Area Ratio of 2.0. The new self-storage facility that would be built on the site would have five employees.

24.2.2. Prototype B

This prototype, as shown in the illustrative example, utilizes a 60,000 sq. ft. lot in an M1-1 district more than 500 feet away of a major traffic arterial. This prototype is located on a site with an E-Designation, which is a NYC zoning map designation that indicates the presence of an environmental requirement pertaining to potential Hazardous Materials Contamination, Window/Wall Noise Attenuation, or Air Quality impacts on a particular tax lot. Accordingly, the applicant would have to follow the Restrictive Declaration Environmental Review Program to assure that environmental requirements established during a land use determination or similar process are fully addressed in a new or existing development.

The Department of City Planning would expect such a site to be granted a Special Permit, due to the necessity of environmental remediation on such a site. A more job-intensive industrial business may have more limited means and may be less likely to follow the Restrictive Declaration Environmental Review Program. The application would be viewed positively, since the self-storage facility would represent a significant improvement over the current state of the site.

For this prototype, the neighborhood of Zerega in the Bronx is chosen, but it is deemed to be representative of many other neighborhoods and Designated Areas in M districts with M1-1 districts, where this prototype may also occur.

The prototype is within a quarter-mile of a low-density residential district, which typically has three- and four-story attached houses and small apartment houses. The maximum building height permitted in the nearby residential district is 40 feet.

In the Existing Condition, this prototype is used for vehicle storage and maintenance. It has 18 workers.

In the With-Action Condition the prototype has a Zoning Floor Area of 60,000 sq. ft., and a Gross Floor Area of 78,000 sq. ft. It includes three loading berths and five parking space, which are provided despite the fact

that the required parking is waived. It is four stories high, which is typical for new construction self-storage on large sites, with a building height of 52 feet and one cellar.

24.3. TECHNICAL ANALYSIS

Although impossible to predict the impacts of the utilization of the proposed self-storage Special Permit, a conceptual analysis is provided below for the purposes of environmental review. In general, the site specific analysis conclusions are generally the same as those in the Prototypical Analysis; density impacts may differ as described below. The utilization of the proposed self-storage Special Permit would undergo a discretionary review process at which time specific impacts would be reviewed and disclosed.

24.3.1. Existing Land Use in Designated Areas in M Districts

The Proposed Action would affect large portions of the city. New York City currently has 21 Industrial Business Zones (IBZs). IBZs function as key industrial areas that accommodate and encourage a range of industrial jobs and activities (NYC Office of the Mayor, 2005). They are composed only of 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 the IBZs. Many of the businesses in IBZs generate truck traffic, noise, odors or emissions, require relatively large sites and are incompatible with residential and high density commercial or community facility development.

Land uses within the Designated Areas in M Districts are predominantly industrial and utilities or transportation-based. Over 60 percent of all lot area in the Designated Areas in M Districts is classified as industrial/manufacturing or utilities/transportation. A high percentage of the land is also classified as vacant (16 percent), which is principally due to a few very large lots on Staten Island that have not been developed.

OVERVIEW OF LAND USES IN DESIGNATED AREAS IN M DISTRICTS	ACRES	PERCENT
Industrial/manufacturing buildings	3213.8	41.04%
Transportation/utilities	1607.4	20.53%
Vacant land	1287.4	16.44%
Parking facilities	486.1	6.21%
No data	442.6	5.65%
Commercial/office buildings	297.3	3.80%
Public facilities and institutions	210.5	2.69%
Open space	204.9	2.62%
Residential buildings	59.0	0.75%
Mixed commercial/residential buildings	21.4	0.27%

FIGURE 1
Source: NYC DCP PLUTO 16v1

The various IBZs differ in their degree of industrial activity, ranging from 98 percent industrial employment in the North Shore IBZ on Staten Island to 48 percent in the Greenpoint/Williamsburg IBZ in Brooklyn. Yet, on the whole, industrial-sector employment accounts for over 68 percent of employment in IBZs, while the M districts not designated as IBZs outside Manhattan have an industrial employment rate of 46 percent. Additionally, between 2010 and 2014, industrial and non-industrial jobs grew at the same rate in IBZs, whereas other M districts outside Manhattan became less industrial (DCP, 2016, see Appendix A).

24.3.2. Existing Zoning in Designated Areas in M Districts

Industrial Business Zones (IBZs) function as key industrial areas that accommodate and encourage a range of industrial jobs and activities (NYC Office of the Mayor, 2005). Mayor de Blasio’s announcement of a 10-point Industrial Action Plan in November 2015 (NYC Office of the Mayor, 2015) specifically targeted IBZs, since these are areas especially well-suited to industrial activity and growth. IBZs are now, but have also historically been, New York City’s most active industrial areas. IBZs typically offer the large sites industrial businesses require, access to truck routes and highways, and sufficient separation from incompatible uses such as residencies. As such, the economic development goals expressed for this area relate to the ability of industrial and manufacturing businesses to operate and find sites in IBZs, all while providing more job opportunities for New Yorkers. For the purpose of the Proposed Action and in order to implement the goals expressed by the 10-point Action Plan within a zoning context, the IBZ boundaries needed to be translated into zoning boundaries. This is because IBZ boundaries are related to a tax program and do not exist in the *NYC Zoning Resolution*. For the Proposed Action, the IBZ boundaries have been translated into zoning text maps, showing Designated Areas in Manufacturing Districts, which largely coincide with the IBZ boundaries.

The Designated Areas are entirely mapped as Manufacturing Districts and include: M1-1, M1-2, M1-3, M1-4, M1-5, M2-1, M3-1, M3-2. Industrial uses are permitted in these districts, according to the characteristics of their operations. Each of the three districts incorporates performance standards limiting the amount and type of industrial nuisances permitted. Light manufacturing uses are permitted in all manufacturing districts. Potentially noxious uses (Use Group 18) are limited to M3, but may also locate in M1 and M2 districts if they comply with the higher performance standards of those districts.

Commercial uses are generally permitted in Manufacturing districts, with some exceptions. However, Use Groups 4 and 5 are not permitted within M2 and M3 districts. Use Group 5 includes community facilities such as houses of worship, community centers, hospitals, ambulatory health care facilities and non-profit facilities without sleeping accommodations. Use Group 5 includes transient hotels.

Three different floor area ratios (1.0, 2.0, 5.0) regulate building size in the mapped districts within the Designated Area. Parking and loading requirements vary with district and use. M1-1, M1-2, M1-3, M2-1, and M3-1 districts are subject to parking requirements based on the type of use and size of an establishment. Typically, these districts require one space for every three employees or every 1,000 square feet of floor area, whichever requires more parking spaces. Warehouses and other storage establishments, require one space for every three employees or every 2,000 square feet of floor area, which requires fewer spaces. M1-4, M1-5, and M3-2 districts are not required to provide off-street parking.

Figure 2 describes the permitted floor area ratio (FAR) and parking requirements in each districts, as well as the overall percentage of land area within the Designated Area that is mapped as each zoning district. Within the Designated Areas, 55 percent of land area is mapped as M1, 15 percent is mapped as M2, and the remaining 30 percent is mapped as M3. In terms of bulk regulations with the Designated Areas, 18 percent of land area permits a maximum FAR of 1.0, 66 percent of land area allows a maximum FAR of 2.0, and the remaining 16 percent allows a maximum FAR of 5.0.

In general within the Designated Areas, M3 districts tend to be mapped adjacent to bodies of water, with M2 and M1 districts mapped more inland, providing a buffer between non-industrial areas and M3 districts. This is particularly true in Hunts Point and Port Morris in the Bronx, North Brooklyn along Newtown Creek and Southwest Brooklyn, Maspeth in Queens, and large portions of the West Shore in Staten Island.

Figure 2: Designated Area Existing Zoning

District	Maximum FAR	Parking	Acres	Percent
M1-1	1.0	Required	6,893	18%
M1-2	2.0	Required	4,203	11%
M1-3	5.0	Required	3,549	9%
M1-4	2.0	Not required	3,949	10%
M1-5	5.0	Not required	2,864	7%
M2-1	2.0	Required	5,981	15%
M3-1	2.0	Required	7,830	20%
M3-2	2.0	Not required	3,969	10%

24.3.3. Existing Public Policy

The *CEQR Technical Manual* stipulates that a preliminary assessment should identify and describe any public policies (formal plans, published reports) that pertain to the study area, and should determine whether the proposed project could alter or conflict with identified policies. The policies described below

are both related to the Designated Areas in M Districts and in most instances also M and C8 districts outside of Designated Areas.

24.3.3.1. One New York Plan

In April 2015, Mayor de Blasio released *OneNYC*, a comprehensive plan that outlines a vision for New York City's future around principles of growth, equity, sustainability, and resiliency.

Vision 1 of *OneNYC* states that New York City will continue to be the world's most dynamic urban economy, where families, businesses, and neighborhoods thrive. A primary goal within that vision is the expansion and cultivation of industry, the growth of quality jobs across a diverse range of sectors, and the activation of the City's industrial assets to support the creation of quality jobs and job-intensive uses (NYC Office of the Mayor, 2015b).

24.3.3.2. 10-Point Industrial Action Plan

In November 2015, Mayor de Blasio announced a 10-point Industrial Action Plan (NYC Office of the Mayor, 2015a), which aims to strengthen NYC's most active industrial areas, invest in industrial and manufacturing businesses, and advance industrial-sector training and workforce development opportunities for New Yorkers. The Industrial Action Plans specifically mentions Industrial Business Zones (IBZs), subsets of the City's manufacturing zones, where public policy aims to support employment growth, industrial innovation, and the provision of industrial services, which allow New York City to function and prosper. The Plan's proposals include zoning changes, infrastructure investments and loans and grants for mission-driven developers.

24.3.3.3. Business Improvement Districts

Business Improvement Districts are locally based organizations that keep their commercial districts clean and safe, market those districts to consumers, visitors and new businesses, and invest in capital improvements to open opportunities for other economic development initiatives to succeed.

The Designated Areas in Manufacturing Districts overlap with the boundaries of four Business Improvement Districts (BIDs), located in Long Island City, Sunnyside and Jamaica in Queens, and East New York in Brooklyn.

24.3.3.4. Waterfront Revitalization Program

The proposed text amendment would establish a CPC Special Permit for the development of self-storage in Designated Areas in Manufacturing Districts (see maps in Appendix). Many of those areas comprise waterfront property and are located within the designated boundaries of the New York City Coastal Zone. Such proposals require an assessment of the action's consistency with the City's Waterfront Revitalization Program (WRP). Accordingly, DCP prepared the Consistency Assessment Form for the NYC Waterfront Revitalization Program (see Appendix).

The New York City Waterfront Revitalization Program (WRP) establishes the City's policies for waterfront planning, preservation and development projects to ensure consistency over the long term. The goal of the

program is to maximize the benefits derived from economic development, environmental conservation and public use of the waterfront, while minimizing any potential conflicts among these objectives. The WRP is authorized by New York State's Waterfront Revitalization of Coastal Areas and Inland Waterways Act, which was enacted in response to the Federal Coastal Zone Management Act, and allows municipalities to participate in the State's Coastal Management Program by creating their own local Waterfront Revitalization Program.

24.3.1. With-Action Land Use in Designated Areas in M Districts

In the With-Action Condition, the two selected prototypes would be self-storage facilities, since they would successfully meet the findings of the proposed CPC Special Permit. Self-storage facilities do not generally create a large array of land use impacts or conflicts with the kinds of uses and businesses that are located in M and C8 districts.

DCP projects under the With-Action Condition, that there would be one application per year for the CPC Special Permit for self-storage in proposed Designated Areas in M districts, resulting in a total of eleven self-storage facilities in Designated Areas in M Districts until the Build Year. Accordingly, the Proposed Action would result in a decrease of nine self-storage facilities in proposed Designated Areas in M districts by the time of the Build Year, and would ensure that the eleven projected self-storage facilities would not occupy sites that would be optimal industrial business siting opportunities.

The introduction of a new discretionary approval process is likely to present a disincentive to the development of self-storage since some self-storage developers may be reluctant to undergo a discretionary review process. Yet, demand for self-storage is not close to being saturated, according to the New York Self Storage Association and is highly lucrative. Accordingly, it is plausible to assume that the Special Permit discretionary review process would not deter all self-storage developers, and that a certain number of Special Permits may be applied for. It is expected that those CPC Special Permit applications would be granted, since the objectives and findings of the proposed Special Permit would permit self-storage development on sites that are suboptimal for more job-intensive industrial businesses. As detailed by the findings of the Special Permit, this includes sites that: are smaller, cannot be easily accessed by major streets, and are not located in areas where there is active investment in employment-intensive industrial uses. The Department of City Planning expects that there would be many sites within the proposed Designated Areas in M districts, where such findings could be met (see examples in Chapter 1, "Project Description").

Under the With-Action Condition, the number of self-storage facilities developed in Designated Areas in Manufacturing districts under the CPC Special Permit framework cannot be precisely determined. For the purpose of this analysis, past application trends of a Special Permit similar to the Proposed Action were used as a reference.

The existing CPC Special Permit for large retail establishments, outlined in Section 74-922 of the *NYC Zoning Resolution*, is considered to share several similarities with the proposed self-storage CPC Special Permit. Similar to the Proposed Action, the 74-922 CPC Special Permit targets a land-intensive, non-industrial use: large retail establishments, described as department stores, carpet, rug, linoleum or other floor covering

stores, clothing or clothing accessory stores, dry goods or fabric stores, food stores, furniture stores, television, radio, phonograph or household appliance stores, or variety stores. Furthermore, the 74-922 CPC Special Permit applies to Manufacturing districts, and was introduced in 1974, at least partially with the intention of protecting Manufacturing districts and ensuring that large retail establishments wouldn't impair the essential character or the future use of or development of the area. The CPC report (CP 22683), dated July 10th 1974, states on pages 1 and 2:

Manufacturing district regulations currently allow a wide range of non-manufacturing activities to occupy land that otherwise could be available for industrial uses and which generate additional traffic. [...] If Manufacturing land is to be protected in the long term, the Zoning Resolution must clearly establish that certain areas should be set aside for manufacturing, even when the industrial land market is slow. Accordingly, the City Planning Commission proposes to eliminate certain non-manufacturing uses from manufacturing districts and to allow others by special permit only.

Accordingly, the 74-922 CPC Special Permit represents an adequate reference for the proposed CPC Special Permit for self-storage.

An analysis of the number of applications received for the 74-922 CPC Special Permit shows that, since the Special Permit's inception in 1974, 67 Special Permits have been processed. In the ten-year timeframe between 2007 and the end of 2016, ten Special Permit applications were completed, or an average of one CPC Special Permit per year. Using recent application patterns for the 74-922 CPC Special Permit, DCP projects that there would be one application per year for the CPC Special Permit for self-storage.

The Proposed Action is not expected to alter any self-storage developments that are currently in the pre-construction phase. Operating under the reasonable assumption that the building permits would be issued before the date of enactment of this proposed text amendment, the two developments that are currently in the pre-construction phase in proposed Designated Areas in M districts would presumably be completed. Accordingly, under the With-Action Condition, assuming all pre-construction projects are realized and one CPC Special Permit is applied for and granted on a yearly basis (amounting to a total of nine Special Permits), a total of eleven new self-storage facilities would be built in the proposed Designated Areas in M districts until the Build Year.

The existing employment and development patterns affecting land use conditions within Designated Areas are expected to continue in the Future With-Action Condition, except that sites suitable for industrial uses could no longer be developed with self-storage facilities. Therefore, it is expected that in the With-Action Condition, the Designated Areas will continue to be the city's most viable industrial areas, supporting employment growth in industrial and manufacturing sectors. Modest non-industrial job growth is also expected, consistent with recent trends. As a result of less self-storage development on suitable sites for industry, more locations would be available for the appropriate siting of growing, often truck-dependent sectors, thereby allowing existing businesses to remain or expand in appropriate locations.

As explained in the Analysis Framework, it is not possible to project with certainty the number and location of self-storage facilities that will be developed until the Build Year in the With-Action condition. Nevertheless, for the purposes of environmental review, a reasonable and conservative framework was created. As described in the Analytical Framework, the Proposed Action is expected to result in a net

reduction in 19 new self-storage facilities across the Designated Areas. Although this is not expected to significantly affect land use conditions within Designated Areas, it would affect the type of development and land use likely to occur on sites that are likely candidates for self-storage development.

It is understood that the Proposed Action alone will not directly induce industrial development: numerous factors influence the kind of uses that are developed in any given area, which remain beyond the scope of the Proposed Action, and which the DCP has no control over. The Proposed Action solely aims to improve future siting opportunities for industrial businesses in NYC, in a context where industrial uses are growing and are already permitted as-of-right in M districts.

Although the Proposed Action itself would not induce development in the Designated Areas in M Districts, the occurrence of development on sites can never be excluded. Sites that may have become self-storage facilities in the No-Action Condition, in the With-Action Condition may be developed for another use instead, since self-storage will no longer be a permitted as-of-right use. Alternatively, an existing use may be more likely to remain in a location that would be redeveloped with self-storage in the No-Action. This DEIS considers the type and location of industrial development and the potential environmental effects of the placement or retention of such an industrial use, by means of representative examples analysis. As discussed in the Draft Scope of Work, the EIS will utilize representative examples of industrial and non-industrial development that may occupy the sites in the With Action should self-storage development not occur.

In order to understand the type of new construction that could occur within Designated Areas in M Zones both No-Action and With-Action Condition, an analysis of New Building Permits issued by the Department of Buildings was completed. The research looked at building permits in Industrial Business Zones for new construction between 2010 and the end of 2016. This time period was estimated to be representative of the kind of development that could reasonably be expected in the near future in the Designated Areas in M Districts. While self-storage development conflicts with the City's economic development goals for Industrial Business Zones for a number of reasons, one reason is that self-storage tends to occupy very large sites in these areas, without providing many employment opportunities. Accordingly, it is important to understand the type of new development in IBZs that has occurred on large sites, which is here defined as any site larger than 20,000 sq. ft. Development that has occurred in the recent past on sites larger than 20,000 sq. ft. is considered to be representative of the kinds of uses and businesses that could potentially have sited in the locations where self-storage facility was developed, which are then seen as lost opportunities. Similarly, past development on large sites illustrates the universe of potential development on such sites in the absence of self-storage in the Future With-Action Condition.

In the Future With-Action Condition, zoning is not generally expected to change in comparison to the No-Action Condition, except for the Proposed Action, which is a zoning text amendment that will require a CPC Special Permit for self-storage facilities.

Due to its restrictive nature, the Proposed Action could create additional non-conformance. Approximately seventy self-storage facilities are expected to be grandfathered due to the Proposed Action. However, the Proposed Action includes a clause that would allow for extensions and enlargements of such grandfathered self-storage facilities within the original zoning lot. The reconstruction of a grandfathered self-storage facility to the previously existing FAR, should it be damaged or destroyed, would also be permitted. This

would give property owners some flexibility to renovate or enlarge their structures without needing to apply for a CPC Special Permit for such minor improvements. Accordingly, all grandfathered buildings would have the rights generally attributed to conforming structures and the Proposed Action would not significantly add to the number of non-conforming structures in IBZs.

24.3.2. With Action Public Policy

Based on the evaluation provided below, the Proposed Action would be consistent with applicable policies for the Designated Areas in M districts, as well as M and C8 districts outside Designated Areas.

24.3.2.1. One New York Plan

The Proposed Action is aligned with the visions and goals stated in the OneNYC Plan, since it aids the City's objective to see commercial and industrial innovation, employment growth and the provision of industrial services in IBZs, by restricting self-storage development in NYC's most active industrial areas. Self-storage development conflicts with the City's vision for IBZs, since it is a low job-generating use that primarily serves residential rather than business needs, and may occupy space in these active industrial areas, which could instead represent siting opportunities for many industrial businesses that require sites large enough to accommodate horizontal operations, off-street loading and vehicle fleet parking. By subjecting the development of self-storage to a discretionary review process and ensuring siting opportunities remain for industrial businesses, the Proposed Action is aligned with Vision 1 and Goal 1 outlined in the OneNYC Plan.

24.3.2.2. 10-Point Industrial Action Plan

The Proposed Action is a direct result of the 10-Point Industrial Action Plan policy announcement, since the Plan included restrictions on new self-storage development in IBZs. A CPC Special Permit for new self-storage facilities within IBZs is proposed to ensure that the development of self-storage does not unduly limit siting opportunities for industrial uses that the 10-point Industrial Action Plan seeks to grow within IBZs. A case-by-case, site-specific review process will ensure that the development of self-storage does not occupy sites that could optimally accommodate industrial businesses. As such, the Proposed Action is fully aligned with the announced policy regarding IBZs.

24.3.2.3. Business Improvement Districts

The Proposed Action would directly affect but not alter or conflict with the goals of the four BIDs in the Primary Study Area - Long Island City Partnership, Sunnyside Shines, Jamaica Center and East Brooklyn. The Proposed Action has been coordinated with the NYC Department of Small Business Services, who oversees and supports BID organizations citywide.

24.3.2.4. Waterfront Revitalization Policy

The WRP policies were individually reviewed, to establish whether the Proposed Action promotes, hinders or is neutral to each WRP policy. Here included are written statements for all policies which are either promoted or hindered by the Proposed Action. By introducing a Special Permit, the Department of City Planning proposes to establish a framework to conduct a case-by-case, site-specific review to ensure that the development of self-storage facilities does not occur on sites that should remain available to industrial, more job-intensive uses. Additionally, a case-by-case framework would allow self-storage facilities to locate

in Designated Areas in M districts on sites where self-storage facilities are found to be appropriate. Given that self-storage development is currently permitted as-of-right, the Proposed Action represents a restriction and a new discretionary review process. The Proposed Action is neutral to the achievement of most WRP policies, namely WRP policy 1, 3, 4, 5, 6, 7, 8, 9 and 10.

The second Waterfront Revitalization Program (WRP) policy stipulates that water-dependent and industrial uses in New York City coastal areas that are well-suited to their continued operation should be supported.

WRP Policy 2.1: Promote water-dependent and industrial uses in Significant Maritime and Industrial Areas

It is understood that New York City's working waterfront is vital to the city's economy. The working waterfront includes airborne and waterborne cargo operations—including containers, roll-on-roll-off, dry and liquid bulk, and heavy lift operations—and passenger transportation. In addition, it includes industrial activity and municipal and public utility services, including energy generation, storage and distribution facilities, and waste management and recycling services. By necessity, the waterfront is home to the marine terminals that are part of the Port of New York and New Jersey—the third biggest port in the country and the largest on the East Coast—as well as the many tugboat and barge operators, marinas, and ship-repair outfits that provide maritime support services to the Port. Certainly, industrial areas within the city's Coastal Zone contain a wide variety of industrial uses that support the local and regional economy and provide valuable services for local workers and businesses. This is the case, in particular, for the Designated Areas in M districts, which represent NYC's most active industrial areas and overlap to a large extent with Significant Maritime Industrial Areas.

The availability of future siting opportunities for industrial businesses in New York City's most active industrial areas is a key component of the City's Industrial Action Plan and presents the foundation of the Proposed Action. As stated in the Purpose and Need, the Proposed Action aims to maintain siting opportunities for industrial businesses, which tend to be job-intensive and/or provide essential services. For these reasons, the Proposed Action promotes and is consistent with this policy.

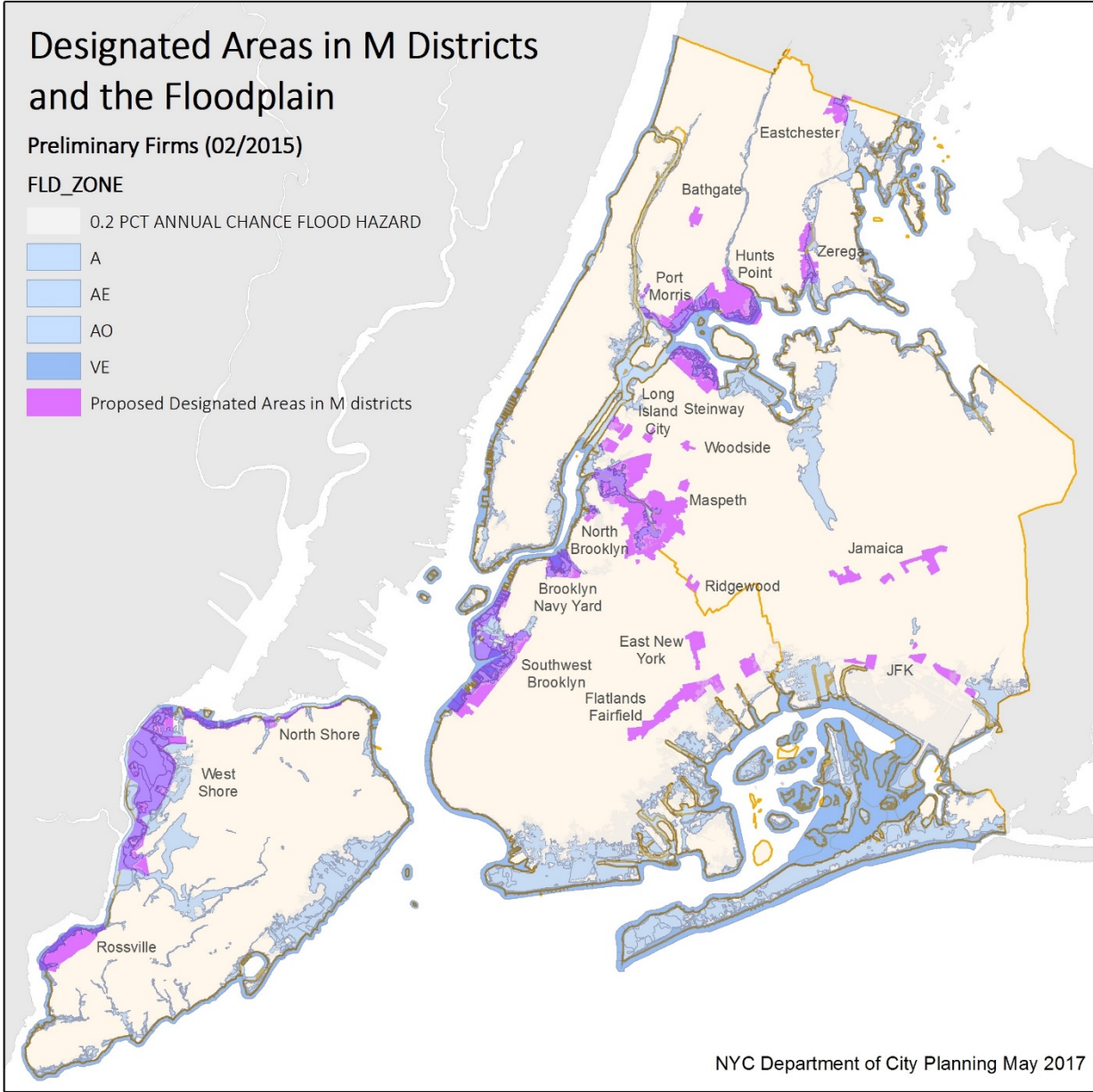


Figure 3

WRP Policy 2.3: Encourage working waterfront uses at appropriate sites outside the Significant Maritime and Industrial Areas or Ecologically Sensitive Maritime Industrial Areas

The Proposed Action affects Designated Areas in M districts, which contain many Significant Maritime Industrial Areas (SMIAs), but also other M districts. The Proposed Action aims to support the continuation of industrial uses in those areas outside SMIAs that are well-located relative to customers and delivery networks and adequately buffered from surrounding residences, by ensuring that future self-storage

development not reduce potential siting opportunities for such uses in Designated Areas in M districts. For these reasons, the Proposed Action promotes and is consistent with this policy.

WRP Policy 6.1: Minimize losses from flooding and erosion by employing non-structural and structural management measures appropriate to the site, the use of the property to be protected, and the surrounding area.

Almost all of the proposed Designated Areas in M districts are within the floodplain. Exceptions are the Designated Areas in Jamaica, Flatlands/Fairfield, East New York, Ridgewood, Woodside and Bathgate (see Figure 3). The Proposed Action would encourage industrial and manufacturing uses, including maritime-dependent, consistent with the underlying zoning, to continue to develop subject to existing federal, state and local floodplain regulations. For these reasons, the Proposed Action promotes and is consistent with this policy.

24.3.3. Socioeconomic Conditions

The Proposed Action would require a Special Permit for a self-storage facility in an M districts, which by definition do not permit residences. This would ensure that direct or indirect residential displacement would not occur. The Proposed Action would also not have the potential to result in direct business and institutional displacement as under the No-Action Condition there would only be 11 and 18 employees in Prototype A and B, respectively. Any self-storage facility approved by Special Permit would also not be likely to result in trends that make it difficult for businesses to remain in the area or result in other indirect business displacement. This would be supported by the finding of the Special Permit: to review the potential for conflict between potential industrial uses on the lot and existing uses in the surrounding area. In terms of adverse effects on specific industries, this too would not be likely as any Special Permit would be for one self-storage facility which alone would not be likely to affect a specific industry. For the reasons cited earlier, it's not expected that the CEQR review of any individual self-storage facility would result in significant adverse socioeconomic impacts. In the unlikely event that such impacts were anticipated they would be disclosed and mitigation measures would be considered.

24.3.4. Community Facilities

As discussed in the prototypical analysis, the utilization of a Special Permit is not anticipated to directly or indirectly impact any community facilities. The location does not permit residential use and thus, no indirect impacts are anticipated. In most Designated Areas, community facilities are not permitted (see, "Land Use, Zoning and Public Policy," Chapter) and where permitted, are not common. For the reasons cited earlier, it's not expected that the CEQR review of any individual self-storage facility would result in significant adverse socioeconomic impacts. In the unlikely event that such impacts were anticipated they would be disclosed and mitigation measures would be considered.

24.3.5. Open Space

As discussed in the Prototypical Analysis, Special Permit applications for self-storage facilities in Designated Areas would not be likely to generate direct impacts- though without project-specific details it is impossible

to rule out any direct impacts. Likewise, Prototype A and Prototype B would not exceed the threshold for any indirect impacts as they would each only generate 5 workers and no residents; this would be a decline from the No-Action Condition. For the reasons cited earlier, it's not expected that the CEQR review of any individual self-storage facility would result in significant adverse open space impacts. In the unlikely event that such impacts were anticipated they would be disclosed and mitigation measures would be considered.

24.3.6. Shadows

A shadows assessment considers projects that result in new shadows long enough to reach a sunlight-sensitive resource. A shadow assessment is required only if the project would: (a) result in new structures (or additions to existing structures including the addition of rooftop mechanical equipment) of 50 feet or more, or (b) be located adjacent to, or across the street from, a sunlight-sensitive resource. However, where a project's height increase is ten feet or less and it is located adjacent to, or across the street from, a sunlight-sensitive open space resource, which is not a designated New York City Landmark or listed on the State/National Registers of Historic Places or eligible for these programs, the lead agency may determine, in consultation with NYC Department of Parks and Recreation, whether a shadow assessment is required.

Prototype A would not exceed 50 feet but Prototype B would exceed 50 feet by two feet. Both Prototype A and B would exceed the screening threshold of ten feet to impact sunlight sensitive resources. While the potential for significant adverse impacts cannot be ruled out, the probability of these impacts would be unlikely. The facility would need to be located in close proximity to a sunlight sensitive resources and would need to be situated in such a way as to adversely impact the resource. While impossible to predict now, the discretionary review process required at the time of application for a Special Permits would require that any adverse impacts be disclosed and mitigation measured considered.

24.3.7. Historic and Cultural Resources

24.3.7.1. Archaeological Resources

The Proposed Action has the potential to result in significant adverse impacts to archaeological resources as it may result in deeper in-ground disturbance. While the potential impacts of the provisions are expected to be limited and unlikely, and would be further limited by the requirement of a discretionary review process, it is not possible to conclude where and to what extent additional in-ground disturbance might occur. As such, the possibility of significant impacts on archaeological resources cannot be eliminated. These impacts would be further analyzed and disclosed at the time of application for a Special Permit.

24.3.7.2. Architectural Resources

Privately owned properties that are NYCLs or in New York City Historic Districts would continue to be protected under the New York City Landmarks Law that requires LPC review and approval before any alteration or demolition can occur. However, impacts to eligible historical resources that are not protected by local, state or national designations may be affected by self-storage facilities subject to a CPC Special Permit. Such impacts are unlikely, however, given that the proposed self-storage facility would need to undergo a discretionary review process, would need to be located in close proximity to an architectural

resource, and need to be situated or constructed in such a way to adversely affect the resource. The likelihood of the combination of these factors is limited although cannot be ruled out. Any potential impacts would be reviewed and disclosed at the time of discretionary review.

24.3.8. Urban Design

As discussed in the Prototypical Analysis, it is unlikely that any self-storage facilities would have the potential for significant adverse impacts to urban design. This would be further reinforced by the following findings of the Special Permit: the size and configuration of the lot and its suitability for an industrial use; in the case of an existing building: its suitability for an industrial use, by considering the design and layout of loading docks, interior column spacing, floor-to-floor height and other relevant physical characteristics; and the potential for conflict between potential industrial uses on the lot and existing uses in the surrounding area.

24.3.9. Hazardous Materials

As discussed in the Prototypical Analysis, the development of self-storage facilities in this area (M districts) does have the potential for significant adverse impacts with respect to hazardous materials. Although the impacts are impossible to tell based on a prototypical development scenario, a discretionary review would be completed prior to the granting of a CPC Special Permit. The applicant would also have to prescribe to any E-designation on the parcel, if applicable. This would be reinforced by the Special Permit Finding which would consider: the need to undertake environmental remediation work on the lot. Additional analysis would be conducted at the time of Special Permit application and any possible impacts would be disclosed.

24.3.10. Water and Sewer Infrastructure

As discussed in the Prototypical Analysis, any Special Permit applications for self-storage facilities would not be likely to result in significant adverse impacts on water supply. The screening analysis concluded that the effects of the Proposed Action would not be great enough to warrant a preliminary analysis of water supply, and therefore would not result in significant adverse impacts to water supply. Likewise, Prototype A and Prototype B would not be located in locations or exhibit characteristics that would require a detailed wastewater and stormwater conveyance and treatment analysis and thus, significant adverse impacts on wastewater and stormwater conveyance and treatment are not likely. Plans for any self-storage facility would also be reviewed and disclosed at the time of discretionary review.

24.3.11. Solid Waste and Sanitation Services

The two prototypes would each generate approximately 145 pounds per week (5 employees * 29 pounds per week). Based on this solid waste generation, none of the four prototypes analyzed would result in a net

increase of more than 50 tons of solid waste per week. In the With-Action scenario, less waste would be produced than in the No-Action Scenario. As such, the Proposed Action would not result in any significant adverse impacts to solid waste and sanitation services.

24.3.12. Energy

The two prototypes would generate an incremental increase of 15,032,616 Mbtu for Prototype A and 15,963,840 Mbtu for Prototype B. Neither amount would result in a net increase of more than 50 tons of solid waste per week and would not result in any significant adverse impacts to solid waste and sanitation services.

24.3.13. Natural Resources

The Proposed Action would not be likely to result in significant adverse impacts on natural resources. Based on the prototypes, natural resources are not likely to be found in M districts and the likelihood of impacts would be similar to that discussed in the Prototypical Analysis. The Proposed Action would not eliminate and/or change the existing State or local protections. Thus, without a specific project, the potential for significant adverse impacts cannot conclusively be eliminated. However, for the reasons cited earlier, it's not expected that the CEQR review of any individual self-storage facility would result in significant adverse socioeconomic impacts. In the unlikely event that such impacts were anticipated they would be disclosed and mitigation measures would be considered.

24.3.14. Transportation

As discussed in Chapter 1, "Project Description," the Proposed Action would require that a Special Permit be granted by the City Planning Commission to allow self-storage facilities to locate in M1, M2, and M3 zoning districts in certain, "Designated Areas". As discussed throughout this document, the Proposed Action is not expected to induce development. Compared to the No-Action condition, the Proposed Project is anticipated to result in a total of nine fewer self-storage facilities inside the Designated Areas.

The Proposed Action would make the development of self-storage facilities within the Designated Areas a discretionary action, triggering the need for a full environmental review. Nevertheless, the following comparison is provided to determine the potential for significant adverse impacts to occur as a result of self-storage facilities being granted by the proposed Special Permit allowing self-storage facilities to be developed inside the Designated Areas. As discussed in Chapter 15, "Transportation," the potential development of the representative self-storage prototypes generates trip levels that are lower than the screening thresholds published in the *2014 CEQR Technical Manual*. Even before taking any trip credits associated with a potential as-of-right development in the No-Action scenario, the Proposed Action does not have the potential to create significant impacts on transportation network and no further analysis is warranted.

24.3.15. Air Quality

Although it is impossible to determine the impacts of the project because project specific details are not available, based on the development of prototypes, impacts would be similar to those discussed in the Prototypical Analysis:

Mobile Sources: The Proposed Action would not result in significant adverse air quality impacts due to mobile sources. Based on the traffic screening criteria provided in CEQR Technical Manual, the Proposed Action would not exceed the thresholds for requiring a mobile source air quality analysis, and therefore, no further analysis is warranted.

Stationary Sources: The Proposed Action would not result in any significant adverse air quality impacts due to stationary sources. Based on the Prototypical Analysis, there would be no potential significant adverse air quality impacts from fossil fuel-fired heat and hot water systems associated with any prototype.

Further air quality review would be conducted at the time of application for the Special Permit and would be reviewed as part of the discretionary review process. The applicant would also have to prescribe to any E-designation on the parcel, if applicable.

24.3.16. Greenhouse Gases

The proposed prototypes would be consistent with the City's Greenhouse Gas (GHG) and climate change goals. Since the Prototypes A and Prototype B not facilitate development greater than 350,000 square feet on a single development site or involve other energy intense projects, per CEQR guidelines, there is not likely to be any significant adverse GHG emissions or climate change impacts as a result of the Proposed Action.

24.3.17. Noise

It is impossible to determine the impacts of a specific project because project specific details are not available at this time. Noise impacts would be reviewed at the time of application for a Special Permit through undergoing a discretionary review process. Additionally, the applicant would also have to prescribe to any E-designation on the parcel, if applicable. However, in general, based on the development of prototypes, impacts would be similar to those discussed in the Prototypical Analysis. As discussed in the Prototypical Analysis, a proposed project would not result in significant adverse noise impacts due to operations of any potential development. The proposed project has the potential to introduce new source receptors near to existing sensitive receptors. However, based on the performance standards set forth by the zoning resolution Section 42-214, self-storage facilities are required to emit a maximum noise level reduced by 6 decibels below the maximum permitted sound pressure level listed in the table below. With the noise level criteria in place, any proposed self-storage facility would not result in significant adverse noise impacts and further analysis is not warranted.

24.3.18. Public Health

As discussed, it is impossible to predict the impacts of air quality, noise, or hazardous materials without having site specific details available. However, based on the prototypes it is not likely that adverse significant impacts would result with regards to air and noise. The potential for hazardous materials cannot be eliminated, but as part of a discretionary review process, hazardous materials would need to be considered. Finally, a finding of the Special Permit would be: the need to undertake environmental remediation work on the lot.

24.3.19. Neighborhood Character

As discussed in the Prototypical Analysis, self-storage facilities would be unlikely to result in adverse impacts to neighborhood character. Additionally, based on the findings of the Special Permit, any approved facility would not have the potential for conflict between potential industrial uses on the lot and existing uses in the surrounding area. Additionally, in the case of an existing building: its suitability for an industrial use, by considering the design and layout of loading docks, interior column spacing, floor-to-floor height and other relevant physical characteristics. It is not anticipated that significant adverse impacts to neighborhood character would result as a result of the granting of the Special Permit.

24.3.20. Construction

The two prototypes are not anticipated to result in significant adverse construction impacts. Based on CEQR Technical Manual guidelines, where the duration of construction is expected to be short-term (less than two years) detailed construction assessment is not warranted. Based on the screening analysis, the Proposed Action is not expected to result in any development where the duration of construction would be over two years.