



DEPARTMENT OF CITY PLANNING
CITY OF NEW YORK

ENVIRONMENTAL ASSESSMENT AND REVIEW DIVISION

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Department of City Planning

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**NOTICE OF COMPLETION OF
THE DRAFT ENVIRONMENTAL IMPACT STATEMENT**
Staten Island and Bronx Special Districts Update

Project Identification

CEQR No. 19DCP083Y
ULURP Nos. 190429 ZMX, 190403ZMR
and N190430 ZRY

SEQRA Classification: Type I

Lead Agency

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Pursuant to City Environmental Quality Review (CEQR), Mayoral Executive Order No. 91 of 1977, CEQR Rules of Procedure of 1991 and the regulations of Article 8 of the State Environmental Conservation Law, State Environmental Quality Review Act (SEQRA) as found in 6 NYCRR Part 617, a Draft Environmental Impact Statement (DEIS) has been prepared for the action described below. Copies of the DEIS are available for public inspection at the office of the undersigned as well as online at www.nyc.gov/planning. The proposal involves actions by the City Planning Commission and Council of the City of New York pursuant to Uniform Land Use Review Procedure (ULURP). A public hearing on the DEIS will be held at a later date to be announced, in conjunction with the City Planning Commission's citywide public hearing pursuant to ULURP. Advance notice will be given of the time and place of the hearing. Written comments on the DEIS are requested and would be received and considered by the Lead Agency until the 10th calendar day following the close of the public hearing.

A. PROJECT IDENTIFICATION

The New York City Department of City Planning (DCP) is proposing zoning map and text amendments to the Zoning Resolution (ZR) to modify existing special districts' regulations and establish a Special Natural Resources District (SNRD) in Community Districts (CD) 1, 2, and 3 in Staten Island and CD 8 in the Bronx. The proposed Special District regulations would provide a clear and consistent framework for natural resource preservation that would balance development and ecological goals. In Staten Island, the Proposed Actions also include targeted changes to the Lower Density Growth Management Area (LDGMA) zoning resolution text and changes to cross-access requirements to further their original intended purposes of protecting neighborhood character and to make the regulations easier to apply.

The Proposed Actions include zoning text and related zoning map amendments that would affect the Special Natural Area District (SNAD) (Article X, Chapter 5), Special South Richmond Development District

(SSRDD) (Article X, Chapter 7), and Special Hillside Preservation District (SHPD) (Article XI, Chapter 9) of the Zoning Resolution. The Proposed Actions would affect Staten Island's SHPD in CD 1; Staten Island's SNADs (NA-1 and NA-3) in CD 1 and 2; Staten Island's SSRDD in CD 3; and the Bronx's SNAD (NA-2) in Riverdale and Fieldston, CD 8. The proposed zoning text amendment to the LDGMA would affect all three community districts in Staten Island. In addition, modified requirements for cross-access between non residential parking lots would apply to sites located within C4-1, C8, M1, M2, and M3 districts in Staten Island. The Proposed Actions would not affect the SNAD in Queens (NA-4).

The Proposed Actions are not expected to cause a significant change in the overall amount, type, or location of development. This proposal is not expected to induce development where it would not have occurred absent the Proposed Actions. However, the land use actions (certifications, authorizations, and special permits) necessary to facilitate development on a site may be changed or eliminated by the Proposed Actions.

The proposal is a coordinated effort developed over the course of several years with input from residents, elected officials, community boards, and other community stakeholders, and with New York City and other public agencies. Implementation of the proposed zoning text and map amendment would require review and approval of the discretionary action pursuant to the City's Uniform Land Use Review Procedure (ULURP). DCP is acting as lead agency on behalf of the City Planning Commission (CPC) and is conducting a coordinated environmental review under the City Environmental Quality Review (CEQR) process. The proposal would also require rule changes subject to Citywide Administrative Procedure Act (CAPA). Proposed rule changes would include changes to: references to online maps, proposed site assessment protocols and associated fees. These proposed changes are required to implement the proposed zoning map and text amendments, and are analyzed as part of the Proposed Actions.

B. PURPOSE AND NEED

The purpose of the Proposed Actions is to provide a clear and consistent framework for natural resource preservation that would balance neighborhood development and ecological goals. The proposed updates would codify best practices; streamline regulations to reflect three principles (prioritizing protection of core habitats, preserving large habitats on private properties, and creating connective corridors for resilient ecosystem); and create clear development standards, resulting in better and more predictable outcomes. Through clear standards, the purpose of the Proposed Actions is to create streamlined processes that would allow small properties (defined as properties measuring less than 1 acre in size) to proceed directly to the Department of Buildings (DOB) for development or alternation permits and require large properties (defined as properties measuring 1 acre or more) and "sensitive" sites (defined as those located in Escarpment or Resource Adjacent Areas as described in section C, below) to proceed to the City Planning Commission for discretionary review (the proposed "CPC review process"). The goals of the Proposed Actions would be achieved by combining three special districts, the SNAD, SHPD, and SSRDD, into a single special district, the SNRD, while creating subdistricts to define the distinct features of each area. The purpose of updating LDGMA and cross-access regulations applicable within Staten Island is to further the original LDGMA goals of maintaining neighborhood character and to streamline the cross-access regulations, making them easier to apply.

Since their establishment, the special districts' regulations have helped to guide thousands of developments and have resulted in tree-lined streets, preserved rock outcrops, old growth trees, wetlands, and forested parks that today exemplify these communities. However, the existing regulatory framework has presented challenges over the last 40 years.

First, the special districts lack a clear development framework and broader ecological strategy to protect natural resources. The current rules focus on protecting individual natural features such as steep slopes, trees, and rock outcrops, and do not consider the importance of ecological connectivity with neighboring sites. No clear guidelines exist that preserve natural features on larger, ecologically sensitive sites that form part of the connected ecosystem. Such preservation is negotiated and decided on a case-by-case basis for a variety of project types, which can result in unpredictable outcomes, time delays, and sometimes destruction

of ecological connectivity that undermines the health of these natural ecosystems. To address this, the proposed CPC review process would establish clear parameters that would result in better site plans with more predictable outcomes for the applicant and the community.

Second, the current framework of requiring discretionary review irrespective of the size of a property or the extent of natural features imposes burdensome cost and time delays for small property owners and results in unpredictable outcomes for the development and preservation of natural features. More than 80 percent of these areas are composed of one- or two-family homes and form the overwhelming majority (approximately 85 percent) of past applications that have come to CPC for approval. To address this challenge, best practices would be codified to create clearly defined parameters that would allow applicants to proceed directly to DOB for building permits and confirm zoning regulation compliance. This would ease the process for homeowners by eliminating CPC review, where appropriate.

Third, under the current rules, multiple discretionary review actions are sometimes required to create a well-designed site that balances development with the preservation of natural features on a property. Property owners are often reluctant to apply for optional land use actions that could result in a better project because these actions could trigger additional delays and costs. They focus instead on those land use actions that are essential to moving the project forward, which can result in missed opportunities for good site planning. To address this, the proposed CPC review process would be more integrated, so that optional land use actions would not result in significant increased costs or delays.

Fourth, science and expertise around environmental protection have evolved since the special district rules were adopted nearly 40 years ago, but the rules have not evolved. Large consolidated natural areas are more ecologically valuable in providing core habitat to a variety of species than smaller areas, but current rules do not recognize the higher value of these larger areas. Technological advances in the last several decades have helped map these ecological communities more accurately, allowing for habitat on larger private properties to be pre-identified to better preserve regional ecological linkages and biodiversity. Current rules are more preservation focused and do not account for the diversity of native landscapes that are recognized today. Individual trees and small plant communities are renewable resources that can be replanted after disturbance to create microhabitats and provide ecosystem services. Ground level plants and understory vegetation play a critical role in the long-term health of forests, help the nutrient cycle by building up organic matter, and provide food and shelter to many insects and wildlife that help the larger ecosystem and human health.

Based on research and an assessment of natural resources and natural features provided by NYC Parks, New York State Department of Environmental Conservation (NYSDEC), and the Natural Areas Conservancy, DCP has identified the regional natural assets unique to areas of the Bronx and Staten Island that are critical for ecological connectivity. The proposal would identify these natural assets, such as City Forever Wild parks and Bluebelts that are protected by public entities, as part of the Proposed Actions in the form of text maps in the Zoning Resolution. These natural assets, called designated natural resources in the SNRD, would form the basis of a holistic ecological strategy to strengthen and protect these core natural areas while guiding development that is balanced with natural resource preservation across the special district.

To achieve this goal, the Proposed Actions would map “ecological areas” (Figure 1-9) based on proximity to designated natural resources such as large parks, forests, and hillsides. These would be represented as text maps in the Zoning Resolution as part of the SNRD and mapped across all subdistricts, as appropriate. Resource Adjacent Areas would be mapped within 100 feet of the property line abutting the designated natural resources. Specific regulations regarding landscape buffers would apply along the boundary of these Resource Adjacent Areas to protect and enhance the core habitat within the protect lands. Escarpment Areas would be mapped along the Serpentine Ridge and would have specific regulations to preserve steep slopes and address erosion and run-off. All other areas of the SNRD would be Base Protection Areas, where consistent regulations would help enhance and connect natural areas across the special district.

To advance this effort and ensure input from community stakeholders, DCP has met with local community boards and convened advisory groups of local civic organizations, architects, landscape architects, environmental groups, elected officials, institutions, and city agencies since April 2015. The advisory

groups established the following principles, which have been used to guide the update process:

- Strengthen and rationalize natural resource preservation.
- Create a homeowner-friendly regulatory environment with robust as-of-right rules for the development of homes on small lots that protect significant natural features.
- Protect and enhance the natural resources and neighborhood character of the districts, with greater predictability of development outcomes.
- Strengthen and clarify regulations so that review by CPC focuses on sites that have a greater impact on natural resources and the public realm.
- Ensure consistency of regulations among the three existing special districts.

Based on principles described above and to apply the framework, the Proposed Actions would:

- Establish regulations that create a hierarchy of natural resource protection based on proximity of a development site to designated natural resources and/or topography (Resource Adjacent Areas and Escarpment Areas) to protect and enhance the most ecologically sensitive resources; and
- Combine the three existing special districts (SNAD, SHPD, and SSRDD) into one special district, the SNRD, to create consistent natural resource preservation rules.

The Proposed Actions would determine the appropriate review process based on the size of properties, proximity to sensitive areas, and effects on neighborhood character and the public realm.

Properties Less than 1 Acre in Size

With clear zoning regulations that would establish building footprint, permeability, trees, and ground cover, most small property owners would proceed directly to DOB for project review and permits, skipping the current requirements for review by CPC. In some special cases, CPC review would still be required. These cases include:

- Development with new private roads, because these sites are more likely to affect the public realm and neighborhood character;
- New buildings or subdivisions of a lot in a historic district to align and coordinate review with Landmarks Preservation Commission (LPC) such that both goals of historic and natural resource preservation are met; and
- Four or more new lots or buildings or eight or more dwelling units in areas that are adjacent to regionally important habitats, or on steep slopes (Resource Adjacent and Escarpment, respectively) because the new as-of-right rules may not predict every outcome that best achieves the goals of balancing development and preservation.

Properties of 1 Acre or More in Size

For larger sites, the proposed rules with clear parameters would require individual site plan review by CPC because large sites may contribute more to the public realm and preservation of natural habitat.

- The proposal encourages upfront long-term planning to create a holistic development plan for the public and the property owner that considers natural resource preservation.
- For sites with existing habitats, portions of habitat would be preserved in perpetuity to maintain ecological connectivity and neighborhood character because the surrounding natural ecosystem and public realm directly rely on intact, larger natural features found on properties that are 1 acre or more.

The Proposed Actions would maintain the primary intent of each special district as guiding development in areas of outstanding natural beauty to protect, maintain, and enhance the natural features and create a consistent framework in a new SNRD to increase predictability and ecological connectivity.

C. DESCRIPTION OF THE PROPOSED ACTION

This section describes the proposed regulations, compares them with existing regulations, and identifies any anticipated change in outcomes from the current scenario. This section describes the location of the

combined special district and its relation to the existing three special districts, provides an overview of the proposed review structure, describes the regulations pertaining to protection of natural features and bulk, and describes the details of discretionary review required. Proposed changes to LDGMA and cross-access regulations are described at the end of this section.

The proposal would also require rule changes subject to Citywide Administrative Procedure Act (CAPA). Proposed rule changes would include changes to: references to online maps, proposed site assessment protocols and associated fees. These proposed changes are required to implement the proposed zoning map and text amendments, and are analyzed as part of the Proposed Actions.

Geography

The proposed special district would combine the boundaries of the three existing special districts (SNAD, SHPD, and SSRDD) into one combined special district, to be referred to as the SNRD. Areas that currently have unique regulations not shared by other special districts would become subdistricts within the SNRD (i.e., the SSRDD would become the South Richmond Subdistrict in the SNRD).

The proposal would establish three new ecological area designations that would be applicable in all sub-districts: Escarpment Area, Resource Adjacent Area, and Base Protection Area. Modified bulk, parking, and planting rules would apply and vary within the three ecological area designations. The Escarpment Area would include the steep slopes of the Serpentine Ridge of Staten Island, from Historic Richmond Town to Tompkinsville; the proposed regulations for this area would balance development on private property and protect geologic and topographic features of the Serpentine Ridge. Resource Adjacent Areas would be the first 100 feet from the lot line that abuts the designated natural resources, which are publicly protected lands with natural habitat, such as parklands designated by the City as “Forever Wild.” The proposed regulations for this area would balance development on private property and protect and provide a buffer from designated natural resources on protected lands. Areas neither designated Escarpment nor Resource Adjacent would be designated as Base Protection Area; the proposed regulations for this area would provide consistent regulations for development and preservation to contribute to the overall ecological importance of the combined special district. The LDGMA and cross-access connections would continue to apply within the same areas in Staten Island as they do under existing conditions.

Review Structure

The proposed SNRD would require CPC review only for properties that are:

- An acre or larger in size where a new building, enlargement, subdivision or site alteration is proposed, or,
- If smaller than 1 acre:
 - Where a private road is proposed to be extended or created;
 - If located in a Resource Adjacent or Escarpment Area, where four or more buildings or lots, or eight or more dwelling units are proposed; or
 - If located in a Historic District and a new building or subdivision is proposed.

Properties that would be required to undergo CPC review are referred to as “Plan Review Sites.” However, minor enlargements and minor site alterations on Plan Review Sites that meet certain proposed thresholds would not require CPC review and would be able to proceed directly to DOB.

All other properties, new buildings, enlargements, subdivisions, and site alterations within the SNRD would be able to proceed directly to DOB.

The proposal would remove CPC review for New York City Department of Environmental Protection (DEP)-managed Bluebelt properties and New York City Department of Parks and Recreation (NYC Parks) properties that is required in the existing SNAD and SHPD because these properties/projects already go through a separate public review process with the Public Design Commission.

Protection of Natural Features

The proposed regulations would approach the preservation of natural features in a holistic manner to enhance the relationship between the natural features on a property and the larger ecological landscape and prioritize protection of large anchor habitats or designated natural resources. Existing properties in the special districts would apply the proposed rules when new construction or significant changes are proposed, and they would be subject to all proposed planting requirements to better protect and enhance these natural areas of regional importance, as well as more controlled lot coverage and limits on hard surface areas such as driveways, walkways, decks, and patios. Properties within Escarpment Areas would be subject to similar requirements and limitations. Development within the Base Protection Area would be subject to meeting the special district regulations by requiring similar requirements for planting, lot coverage, and hard surface area, thus contributing to the overall ecological importance of the special district. The proposed regulations for planting, lot coverage, and hard surface areas would also be modified.

Use Regulations

Existing special use regulations applicable in the SSRDD would continue to apply under the proposed regulations in the proposed South Richmond Subdistrict. Use for all other parts of the special districts is governed by underlying regulations and would not be affected by the proposed regulations.

Bulk Regulations

The proposed regulations would modify bulk regulations to provide predictable and clear outcomes for future development and apply more stringent controls based on a lot's adjacency to important ecological features. The proposed regulations would:

- Introduce the concept of lot coverage for all R1, R2, and R3 districts, including the districts that are currently governed by yard and open space regulations;
- Limit the amount of hard surface area as a percentage of the lot;
- Require larger minimum lot areas to ensure the preservation of these areas and reduce encroachment from proposed development within sensitive natural areas;
- Modify underlying and existing SSRDD yard regulations for the preservation of natural features;
- include a rule that would apply to Resource Adjacent Areas and to lots with steep slopes or nearby New York State Department of Environmental Conservation (NYSDEC)-regulated wetlands to allow for an additional 5 feet in the height of buildings in R1, R2, and R3 districts;
- Make the required 20-foot setbacks along arterial streets in the SSRDD commercial and manufacturing districts optional (except for some use groups), provided certain requirements are met. Rules requiring buildings to be set back from the Staten Island Rapid Transit right-of-way would continue to apply. Park street designations would be eliminated; and
- Require an open area at the rear of any residence and adjacent to designated open space (DOS) or a wetland buffer surrounding a NYSDEC wetland or any other wetland in Plan Review Sites. For Plan Review Sites properties containing community facilities, such as schools, colleges, or universities, a special type of open area consisting of 15 percent of the lot would be required to provide recreational amenities.

Parking and Curb Cut Regulations

The proposed regulations would modify the LDGMA requirement in the special district to allow parking between the street wall and the street line. The proposed regulations would also modify curb cut and parking location rules for lots within Resource Adjacent Areas and lots with steep slopes or nearby NYSDEC wetlands to allow more flexible site design to avoid disturbance to slopes or other sensitive natural features.

The proposed regulations would restrict curb cuts along designated arterial streets in the South Richmond Subdistrict with rules similar to existing SSRDD regulations.

In the SSRDD, under the proposed regulations, CPC would review parking circulation and vehicular access and egress in relation to sites larger than 1 acre, and the existing CPC authorization for parking for more than 30 spaces would be eliminated.

Special Rules for Plan Review Sites

Under the Proposed Action, Plan Review Sites (i.e. properties that would be required to undergo CPC review) would be required to seek CPC authorizations for any proposed developments, enlargements, site alterations, or subdivisions. These authorizations would provide Plan Review Sites the opportunity to modify underlying SNRD regulations and zoning rules, insofar as clear standards are followed. Plan Review Sites would also be eligible to apply for additional CPC authorizations, including the approval of a long-term development site plan that approaches development in phases. Phased development could occur pursuant to long-term development site plan approvals. At a later, post-approval date, a certification or authorization would be required to confirm that development is consistent with prior approvals. Plan Review Sites with DOS or areas required to be preserved as natural habitat may apply for modification of the boundaries of a habitat preservation area, modification of permitted residential building types, or modification of bulk regulations, pursuant to the findings described in the Zoning Resolution.

Properties with new or extended private roads would be subject to proposed new private road standards that would be based on existing regulations for private roads in the SNAD and SHPD. For certain commercial uses, new buildings or enlargements on Plan Review Sites would be required to have at least half of their frontages within 20 feet of a street and loading areas would not be permitted in front of a building. Plan Review Sites would also be exempt from triggering the need for CPC review if the proposed enlargement meets specific requirements.

Approvals

Certifications

Under the Proposed Actions, the current review process applicable to sites located within the proposed South Richmond Subdistrict would change. Certifications facilitating developments in DOS and certifications facilitating development on lots with a required waterfront esplanade would warrant CPC Chair review, instead of a full City Planning Commission (CPC) review. Certifications regarding fences in DOS would be eliminated altogether, since similar outcomes could be achieved on an as-of-right basis. Certifications for future subdivisions for any non-Plan Review Sites would be eliminated altogether, as well.

Two new certifications would be created as part of the Proposed Actions: the first would certify that a development on a Plan Review Site complies with a previously approved plan for the long-term development of a large site. The second would certify that, on a lot larger than 1 acre containing habitat of 0.25 acre or more, trees proposed for removal are not in an area that would be considered natural habitat.

Authorizations

All Plan Review Sites would be required to apply for CPC authorization for any proposed developments, enlargements, site alterations, or subdivisions, in the future with the Proposed Actions. Permission to proceed, if granted, would be based on the extent that the project meets the findings established under the proposed regulations. The authorization would allow the modification of regulations for private roads, parking areas, and site-planning requirements for Plan Review Sites to preserve natural features and result in a site plan that best meets the goals of the special district.

Plan Review Sites would have the option to seek CPC authorization for a long-term development plan, which would establish areas of the site within which future development is proposed. If CPC approves the plan, development within the parameters of the plan could be constructed subject to a certification or authorization, depending on how specifically the future development parameters are detailed.

Plan Review Sites with DOS or areas required to be preserved as natural habitat could apply for various authorizations that would permit CPC to modify various zoning rules. CPC would be permitted to:

- Modify the habitat preservation area standards to resolve site design conflicts;
- Facilitate site design that better protects natural features;
- Allow clustering of development by modifying the permitted residential building types or bulk regulations; and

- Modify the special lot coverage, open area, and habitat preservation requirements applicable to large community facility campuses.

Special Permits

A special permit would be required for modifying the boundaries of a previously approved and established habitat preservation area, under the Proposed Actions. Boundary modification would be permitted only where unforeseen circumstances require the changing of the boundaries, and where measures have been taken to establish a new area to be preserved or to enhance the existing habitat.

In the SSRDD, the proposal would eliminate four special permits applicable for sites with DOS that currently permit: (1) adjustment of a DOS boundary, (2) community facility buildings or treatment plants in DOS, (3) building encroachment into DOS, and (4) bulk modification for lots with more than 50 percent DOS.

Lower Density Growth Management Area

The Proposed Actions would modify certain sections of the LDGMA that are applicable only in Staten Island to clarify and align the existing rules with the original intent of the LDGMA, which is to maintain and enhance the neighborhood character, as follows:

- The proposal would update ZR 23-32 to exclude private roads and associated planting strips and sidewalks from the calculation of minimum lot area to preserve neighborhood character, similar to existing regulations in the existing SHPD.
- LDGMA regulations currently require that any new building be located only on a portion of the zoning lot where the minimum lot width requirement is met, specifically between opposing side lot lines, which is a defined term in zoning. Proposed zoning would clarify that lot width measurements be measured between any side lot line and its opposing lot line in an LDGMA.
- To discourage inappropriate residential development, the 2006 Lower Density Commercial Text Amendment (060066 ZRR) requires development within Commercial Districts or overlays to be in mixed-use buildings if any residential use is proposed (ZR 32-11), and similarly, to have commercial or community facility uses on ground floors (ZR 32-433). This proposal would remove the requirement for mixed buildings (ZR 32-11) in all commercial overlays, so that ZR Section 32-433 would solely govern commercial uses along primary commercial corridors and residential side streets to preserve the neighborhood characters of both.
- In C1, C2, and C4-1 districts within Staten Island, 5-foot-wide landscaped buffers are required along the side lot lines of a lot containing non-residential uses bordering a zoning lot with residential uses. The zoning text would be modified to include rear lot lines according to the original intent described for LDGMA, and it would apply to C8 Commercial Districts as well. In similar regard for residential neighborhood character, the same landscaped buffer would be required along a street line without a street wall building with at least 50 percent window area, typical of a storefront that is across the street from a zoning with a residential use. These landscaping requirements would only establish new minimum planting or landscaping standards and would not be in addition to other landscaping rules.

Cross-Access Connections

Currently, CPC Chair Certification is required to demonstrate that cross-access connections are meeting the regulations. The proposed requirements and conditions would be clarified so that cross access could be provided as-of-right. The existing land use action to certify that no connection is required would be modified to be as-of-right as described below.

- To reduce redundancy of connections and avoid creating unforeseen travel routes, the proposed regulations would require only one connection to each adjacent lot fronting the same street or an intersecting street.
- The proposed regulations would allow for cross access even with the existence of a building on the adjacent property within 50 feet, or if there is an excess of 15 percent grade change. The proposed regulations would also clarify a threshold for existing trees that must be on the property to waive a

potential cross-access connection.

- The proposed regulations would allow for pedestrian-only connections in certain instances where vehicular connections are not feasible. The proposed regulations would also facilitate a wider cross-access connection for both pedestrians and vehicles.
- To prevent requiring connections that were not originally intended when the cross-access regulations were adopted, the regulations would be clarified for certain uses.

Commission Chair Certifications

CPC Chair Certification would no longer be needed to certify that a proposed potential or completed cross-access connection meets the regulations.

If no cross access could be created because of the existence of wetlands, a significant number and caliper of trees or other habitat identified for Plan Review Sites, or would be too steeply sloped, the applicant would need DOB commissioner certification that no cross access is required, instead of requiring CPC Chair Certification in the current regulations. If the cross-access connection were blocked by a building within the subject zoning lot or property, the CPC Chair would still need to certify that a cross-access connection is not required.

To specifically allow an alternative cross-access connection that does not meet rules (if other connections are not feasible), a new Chair certification would be created that allows such an alternative cross access (if determined to be possible) as long as the Commission finds that turning diagrams and ground clearance diagrams indicate that vehicles can maneuver safely between the parking lots, and such cross-access connections are adequately located so as not to impair adequate ingress, egress, and circulation with respect to abutting streets or uses.

Authorizations

The existing authorization, which allows irregular lots or infeasible site plans to waive or modify the cross access connection regulations would remain.

D. ANALYTICAL FRAMEWORK AND REASONABLE WORST-CASE DEVELOPMENT SCENARIO

Approach to Analysis

In conformance with CEQR methodologies for the preparation of an environmental impact statement (EIS), this EIS does the following:

- Describes the Proposed Actions and their environmental setting;
- Identifies and analyzes any significant, adverse environmental impacts of the Proposed Actions;
- Identifies any significant, adverse environmental impacts that cannot be avoided if the Proposed Actions are implemented;
- Discusses alternatives to the Proposed Actions;
- Identifies irreversible and irretrievable commitments of resources that would be involved in the Proposed Actions should they be implemented; and
- Identifies and analyzes practicable and feasible mitigation to address any significant, adverse impacts generated by the Proposed Actions.

The basis for environmental review is the comparison between a future in which the Proposed Actions are not implemented (the No Action scenario) and the future with the Proposed Actions (the With Action scenario). This framework, a Reasonable Worst-case Development Scenario (RWCDS), is used as the basis for analysis for assessing the potential environmental impacts of a proposed action. The RWCDS takes existing conditions and adds known or projected changes to arrive at a reasonable estimate of future conditions in both the No Action and With Action scenarios.

Consistent with *2014 CEQR Technical Manual* guidance, a RWCDS was developed for the Proposed Actions. The Proposed Actions are analyzed generically because no known developments are projected at

this time. According to the *CEQR Technical Manual*, generic actions are programs and plans that have wide application or affect a range of future alternative policies; for such actions, a site-specific description or analysis is not appropriate.

Methodology for Analysis

Because of the broad applicability of the Proposed Actions, it is difficult to predict the sites where development would occur. In addition, the proposal is not expected to induce development where it would not have occurred absent the Proposed Actions. While the proposal may change the proportion of sites proceeding as-of-right, the overall amount, type, and location of development in the affected area is not anticipated to change. The sites anticipated to develop in either the No Action scenario or the With Action scenario would be expected to be similar. Because of the generic nature of this action, there are no known or projected development sites identified as part of the RWCDs. As described in the *CEQR Technical Manual*, generic analyses are conducted using the following methodology:

- **Identify Typical Cases:** Provide several descriptions similar to those in a localized action for cases that can reasonably typify the conditions and impacts of the entire proposal.
- **Identify a Range of Conditions:** Discuss the range of conditions or situations under which the action(s) may take place, so that the full range of impacts can be identified.

To produce the RWCDs framework, 16 representative, prototypical sites were identified. These prototypical analysis sites serve as an analysis tool to demonstrate the wide range of how the proposed regulations could apply to sites that would be able to develop as-of-right in future with approvals of Proposed Actions (the future With Action scenario). Prototypical analysis sites are shown in Appendix 2. These sites are used to assess the effect of changes to proposed regulations (including the elimination of existing discretionary actions), in which development would proceed on an “as-of-right” basis (not requiring discretionary approvals) under the With Action scenario.

Conceptual Analysis – Analysis of Proposed, New Authorizations and Special Permits

Under SEQRA, a conceptual analysis is warranted if a proposal creates new discretionary actions that are broadly applicable, even when projects seeking those discretionary actions will trigger a future, separate environmental review. SEQRA's goal is to incorporate environmental considerations into the decision-making process at the earliest possible opportunity. Thus, it is the Lead Agency's obligation to consider all possible environmental impacts of the new discretionary actions at the time it creates them, at least on a conceptual basis.

The Proposed Actions introduce new discretionary authorizations and special permits applicable to certain Plan Review Sites. On these sites, future development may require separate, future, discretionary authorizations or special permits that are newly introduced by the Proposed Actions. While these discretionary approvals would trigger environmental review at the time they are sought, the environmental effects of these approvals were analyzed conceptually, as a means of disclosing future potential significant adverse impacts.

Analysis Year

The 2014 CEQR Technical Manual notes that, for some actions where the build-out depends on market conditions and other variables, the build year cannot be determined with precision. In these cases, a 10 year build year is generally considered reasonable because it captures a typical cycle of market conditions and generally represents the outer timeframe within which predictions of future development may usually be made without speculation. Therefore, an analysis year of 2029 has been identified for this environmental review.

E. PRINCIPAL CONCLUSIONS OF ENVIRONMENTAL ANALYSES

Land Use, Zoning, and Public Policy

No significant, adverse impacts on land use, zoning, or public policy are anticipated in the future with the Proposed Actions. The Proposed Actions would not directly displace any land uses in any of the affected

zoning districts to adversely affect surrounding land uses, nor would they generate land uses that would be incompatible with land uses, zoning, or public policy. Because the Proposed Actions would not change the underlying zoning or permitted uses, they would not create land uses or structures that would be incompatible with the underlying zoning or conflict with public policies, including the Waterfront Revitalization Program (WRP), applicable to the affected districts or surrounding neighborhoods. Overall, the Proposed Actions would create a framework for new development in areas with significant natural features to protect and enhance the City's most ecologically sensitive resources.

Socioeconomic Conditions

The Proposed Actions would not result in significant, adverse impacts related to socioeconomic conditions. The Proposed Actions are intended to be largely development neutral. As a result, sites that are developed with or without the Proposed Actions are unlikely to differ materially, especially in terms of density. While the Proposed Actions may change the configuration of certain developments, the differences from a socioeconomic standpoint would be minor. The following sections summarize the conclusions for each of the five CEQR areas of socioeconomic concern.

Direct Residential Displacement

No existing residential uses or residents would be displaced. The Proposed Actions are not expected to induce the redevelopment of sites with existing residential uses; they are not expected to result in residential displacement.

Direct Business Displacement

No existing commercial or institutional uses would be displaced. The Proposed Actions are not expected to induce the redevelopment of sites that currently provide employment or contain commercial or institutional uses, and as such, are not expected to result in business displacement.

Indirect Residential Displacement

The Proposed Actions would not result in significant, adverse impacts related to indirect residential displacement. On an individual site basis, the Proposed Actions would facilitate development of a maximum of three additional residential units. In addition, because of the limited number of vacant or underbuilt sites and low-density zoning, clustering implications would be unlikely. The Proposed Actions would not have an effect that would exceed CEQR thresholds for potential impacts related to indirect residential displacement.

Indirect Business Displacement

The Proposed Actions would not result in significant, adverse impacts related to indirect business displacement. The Proposed Actions would facilitate less than 200,000 square feet of commercial development; they would not result in substantial new development that is markedly different from existing uses and development; and they would not create or add to a retail concentration. Furthermore, the Proposed Actions would not introduce new uses to a zoning district, and therefore would not introduce a new trend or residential population that could alter economic patterns.

Adverse Effects on Specific Industries

The Proposed Actions would not result in significant, adverse impacts related to effects on specific industries, such as the housing market or construction industry. The Proposed Actions would not have a substantial effect on the development potential of sites in the project area, nor are they expected to modify the current housing development rate within the affected areas. The Proposed Actions would not substantially affect the employment and business conditions of specific industries.

Community Facilities

The Proposed Actions would not result in direct or indirect significant adverse impacts related to community facilities.

Direct Impacts

The Proposed Actions would not result in direct impacts on community facilities. The Proposed Actions would not displace or otherwise directly affect any public schools, libraries, childcare centers, health care facilities, or police and fire protection services facilities. Therefore, an analysis of direct effects is not warranted.

Indirect Impacts

The Proposed Actions would not result in significant, adverse, indirect impacts on community facilities. Based on the 2014 CEQR Technical Manual thresholds, as well as recently updated New York City School Construction Authority (SCA) project public school ratios data, detailed analysis of public schools, childcare centers, health care centers, and fire and police services are not warranted, although they are discussed qualitatively. As described below, the Proposed Actions would not result in a significant, adverse impacts on community facilities.

Public Schools, Childcare Services, and Libraries

The Proposed Actions would not result in significant, adverse impacts on public schools, childcare services, or libraries. The Proposed Actions are not expected to induce development where it would not otherwise occur. Although the Proposed Actions would facilitate an increase in residential units at some prototypical analysis sites, the increases would not exceed the thresholds for detailed analysis of schools, childcare, or libraries. Significant clustering of development would have to occur to exceed thresholds that require analysis, and such clustering is unlikely to occur given the low number of development sites in the affected zoning districts.

Police, Fire, and Health Care Services

The Proposed Actions would not result in the introduction of a sizeable new neighborhood. Any increase in residential units would be negligible, and the 2014 CEQR Technical Manual thresholds for police/fire services and health care facilities also would not be exceeded.

Open Space

The Proposed Actions would not result in direct or indirect significant adverse impacts related to open space resources.

Direct Impacts

The Proposed Actions could decrease the amount of private open space on some development sites. However, because the Proposed Actions would require the preservation of an adequate amount of open space necessary for the protection and enhancement of the natural environment on non-residential development sites, the actions are not expected to result in a significant, adverse open space impact.

The Proposed Actions also include adjustments to DOS boundaries, which could reduce the overall amount of DOS. However, any potential loss of DOS would be negligible and would not adversely affect usability or accessibility of the open space. In addition, the proposed minor changes to DOS rules would not result in an adverse direct impact on open space resources.

Indirect Impacts

Although the Proposed Actions may increase the number of as-of-right development sites and could result in slight changes to resulting site-specific development, the Proposed Actions are not expected to change the overall amount, type, and location of development within the proposed special district. As such, the Proposed Actions would not generate a substantial demand for open space resources. The Proposed Actions are not anticipated to result in a substantive change in the capacity of existing or proposed open space resources.

Shadows

The Proposed Actions would not result in significant, adverse shadow impacts. The Proposed Actions are expected to affect small, peripheral areas of sunlight-sensitive resources, but all affected resources would continue to receive direct sunlight throughout the day, and no natural resources are expected to be permanently shaded to a degree that would affect public use and enjoyment or plant and animal survival. The Proposed Actions would not result in development which would substantially reduce or completely eliminate sun exposure to sunlight-sensitive resources. Additionally, the Proposed Actions would not result in changes to permitted building height, bulk, or yard requirements that are likely to significantly alter shadow coverage or duration compared to existing conditions.

Historic and Cultural Resources

Archaeological Resources

The Proposed Actions may result in significant adverse impacts related to archaeological resources. The Proposed Actions could result in increased ground disturbance at some locations. The extent of effects on archaeological resources is unknown because of the generic nature of the Proposed Actions, and it is not possible to conclude exactly where and to what extent additional ground disturbance may occur. Without an assessment of a specific development site, the absence of archaeological resources cannot be definitively demonstrated. As such, the possibility of impacts on archaeological resources cannot be eliminated. The Proposed Actions are not expected to induce development on sites where development would not have otherwise been possible, thereby limiting the potential for additional ground disturbance, and the potential for significant adverse impacts related to archaeological resources.

Architectural Resources

The Proposed Actions would not result in direct or indirect significant adverse impacts related to architectural resources. The Proposed Actions are not expected to induce development. Privately owned properties that are New York City Landmarks (NYCLs) or in New York City Historic Districts would continue to be protected under the New York City Landmarks Law that requires New York City Landmarks Preservation Commission (LPC) review and approval before any alteration or demolition could occur. In addition, the New York City Building Code also provides some measure of protection for all properties against accidental damage from adjacent construction by requiring that all buildings, lots, and service facilities adjacent to foundation and earthwork areas be protected and supported. The Proposed Actions may increase the shadow cast on some historic architectural resources, but the increase would not be significant.

Urban Design and Visual Resources

No significant, adverse impacts on urban design or visual resources are expected to result from the Proposed Actions; the effects of the Proposed Actions on the pedestrian's experience of public space in the special districts are not expected to be discernable. The Proposed Actions would result in minimal new developments or enlargements that would not have occurred without the Proposed Actions, and any new development or enlargement under the Proposed Actions would not change the context of the special districts, nor would they result in any substantial changes to the built or natural environment that would significantly change a pedestrian's experience of public space. Additionally, the Proposed Actions would not eliminate any publicly accessible view corridors, or block public views to any visual resources, nor would they result in any substantial changes to a historic district. The Proposed Actions are intended to enhance the visual character and urban design features of the special districts by preserving and promoting the natural features and broader ecological context that defines the area. Therefore, no significant, adverse impacts related to urban design and visual resources are expected because of the Proposed Actions.

Natural Resources

Water Resources

The Proposed Actions are not anticipated to result in an effect on state or federal regulations requiring approval from NYSDEC or the U.S. Army Corps of Engineers (USACE) for proposed development or

other regulated activity in regulated areas. Any proposed development within or affecting a NYSDEC- or USACE-regulated surface water body would require a permit at these agencies' discretion. The permitting process would ensure that the proposed development would not result in adverse impacts on water resources. The Proposed Actions would have no effect on surface water bodies that are resources for shipping and boating, recreational resources, or water supply. The Proposed Actions include more protective requirements to minimize impacts on water resources and protect and enhance buffer areas.

Wetland Resources

The Proposed Actions would have no effect on state or federal regulations requiring approval from NYSDEC or USACE for proposed development or other regulated activity in regulated areas. Implementation of the individual activities in regulated areas would be conditioned upon issuance of applicable federal and state permits, and such projects would be constructed in accordance with applicable federal and state permit conditions. The Proposed Actions include zoning changes that would allow wetlands to perform their functions of conveying, storing, and filtering surface water hydrology runoff by minimizing the number and size of hard surface surfaces in the landscape surrounding wetland resources.

Upland Resources

The Proposed Actions would not affect upland natural areas would because the private properties that the Proposed Actions would affect do not contain these types of natural resources. The Proposed Actions would have no effect on upland resources that are present outside private property limits. Potential impacts on upland forest habitat adjacent to private lots would be minimized by focusing development on forest edges and designing cluster developments that minimize the spatial extent of the development. Zoning requirements call for avoiding the removal or disturbance of large trees or plants with known ecological value. The mostly likely impacts on upland resources would be related to tree removal for proposed development. Such removal would be required to comply with City regulations, which detail the requirements and rules for applying for permission to remove trees under DPR jurisdiction and for determining tree replacement values. Zoning changes would also encourage increased biodiversity, tree preservation, and the appropriate design of landscape elements.

Built Resources

The Proposed Actions would have no effect on built resources because the private properties that the Proposed Actions would affect are not likely to contain structures that would serve as habitat or function as flood control. The Proposed Actions would have no effect on built resources that are located in the study area but outside private property limits.

Significant, Sensitive, or Designated Resources

For proposed development projects where the private lots are adjacent to significant, sensitive, or designated resources, the Proposed Actions would minimize disturbance to existing habitat and avoid habitat fragmentation by maintaining or enhancing buffers surrounding designated resources. Direct impacts on special-status species, or adverse modification of occupied habitat of special-status species, are not anticipated because of the developed nature of the private properties that the Proposed Actions would affect. The Proposed Actions would have no effect on significant, sensitive, or designated resources that are located in the study area but outside private property limits.

Hazardous Materials

The Proposed Actions could potentially result in significant, adverse impacts related to hazardous materials. The Proposed Actions could increase ground disturbance in areas where hazardous materials may be present. The extent of effects of hazardous materials are unknown because of the generic nature of the Proposed Actions, and because it is not possible to determine exactly where and to what extent additional ground disturbance may occur. Without an assessment of a specific development site, the absence of hazardous materials cannot be definitively demonstrated. As such, the possibility of impacts related to hazardous materials cannot be eliminated. However, the extent of the potential impact is expected to be limited. The Proposed Actions are not expected to induce development on sites where development would

not have otherwise been possible, thereby limiting the potential for additional ground disturbance.

Water and Sewer Infrastructure

Water Supply

The Proposed Actions are not expected to result in an exceptionally large demand of more than one million gallons of water per day and would not involve the development of a power plant, large cooling system, or other large developments. While the individual sites to which the Proposed Actions would apply would be located throughout much of Staten Island and a portion of the Bronx and may potentially include areas that experience low water pressure, any incremental density is expected to fall well below the threshold for detailed analysis. As such, the Proposed Actions would not result in significant, adverse impacts on water supply.

Wastewater and Stormwater Conveyance and Treatment

The Proposed Actions would not result in significant, adverse impacts on wastewater and stormwater conveyance and treatment. Incremental development that may occur as a result of the Proposed Actions would fall below the CEQR guidance thresholds.

Solid Waste and Sanitation Services

The Proposed Actions would not result in any significant, adverse impacts on solid waste and sanitation services. The incremental development that may occur as a result of the Proposed Action would not be substantial enough to raise the need for a solid waste and sanitation services assessment. As such, the Proposed Actions would not affect solid waste and sanitation services.

Energy

The Proposed Actions would not result in significant, adverse impacts on the generation or transmission of energy. The Proposed Actions would generate a nominal increase in demand at some development sites facilitated by the Proposed Action. Based on the incremental change in energy use calculated, the Proposed Actions would not have a substantial impact on the City's energy systems.

Transportation

The Proposed Actions would not result in significant, adverse impacts on the transportation network. The Proposed Actions are not anticipated to change the sites on which development would occur under the With-Action condition compared to the No-Action condition. Any development sites facilitated by the Proposed Actions would be limited, and would be distributed throughout Staten Island and a portion of the Bronx, in a way where density, and therefore, vehicular trips, are dispersed rather than concentrated. The incremental development at these sites would not exceed the minimum development densities for further analysis described in the CEQR Technical Manual. Therefore, the Proposed Actions would result in fewer than 50 peak hour vehicle trips, 200 peak hour subway/rail or bus transit riders, and 200 peak hour pedestrian trips at any one prototypical analysis site, and further analysis is not warranted.

Air Quality

The Proposed Actions would not result in any significant, adverse impacts on air quality.

Mobile Sources

The Proposed Actions would not result in significant, adverse impacts on air quality from mobile sources. The number of incremental vehicular trips generated by the Proposed Actions at any individual site would not result in mobile source impacts.

Stationary Sources

The Proposed Actions would not result in significant, adverse impacts on air quality from stationary sources. There would be no potential significant, adverse impacts on air quality from fossil fuel-fired heat and hot water systems associated with development at any individual site affected by the Proposed Action. Additionally, the Proposed Actions would not result in significant, adverse impacts from industrial or major

emission sources.

Greenhouse Gas Emissions and Climate Change

The Proposed Actions would not result in significant, adverse impacts related to greenhouse gas emissions or climate change. The Proposed Actions would not involve other energy intense projects or result in development greater than 350,000 square feet at any location. The Proposed Actions would conserve natural habitats and wetland areas that perform valuable ecosystem services, including stormwater absorption, flood mitigation, and temperature regulations; and as such, would serve to improve and strengthen the sustainability and resiliency of the City to climate change.

Noise

The Proposed Actions would not result in significant adverse impacts related to noise. Increased traffic volumes, which would be the primary mobile noise source under the Proposed Actions, could be generated at some sites. However, none of the sites would generate traffic increases of 100 percent or more, which is equivalent to an increase of 3 A weighted decibels or more. In addition, the Proposed Actions would not result in increased placement of sensitive receptors in proximity to trains, airports, or other mobile source generators. Rooftop mechanical equipment, including air conditioner compressors, for any potential development would be enclosed and would comply with New York City Noise Code requirements. As such, per guidance under the 2014 CEQR Technical Manual, the Proposed Actions would not significantly affect noise.

Public Health

The Proposed Actions would not result in significant, adverse impacts related to public health. The Proposed Actions would not result in significant, adverse impacts related to air quality, water quality, or noise. The Proposed Actions would potentially result in significant, adverse impacts related to hazardous materials due to increased ground disturbance, but the potential for these impacts to occur is expected to be limited and would not significantly affect public health. Therefore, further analysis is not needed, and adverse public health impacts are not expected as a result of the Proposed Actions.

Neighborhood Character

The Proposed Actions would not result in significant, adverse impacts on neighborhood character, including land use, socioeconomic conditions, open space, historic and cultural resources, urban design and visual resources, shadows, transportation, and noise. The Proposed Actions would not affect any defining features of neighborhood character nor would a combination of moderately adverse impacts affect the study area's defining features. Overall, the Proposed Actions are intended to strengthen neighborhood character through the preservation of unique topography and ecological conditions within the study area.

Construction

The Proposed Actions would not result in significant, adverse construction impacts. The Proposed Actions are not expected to result in any development where the duration of construction would exceed two years. Construction would be subject to the government regulations and oversight detailed below in Construction Regulations and General Practices and would employ the general construction practices described therein. In addition, any designated NYCL- or State/National Register-listed historic buildings located within 90 linear feet of a projected or potential new construction site would be subject to DOB's Technical Policy and Procedure Notice (TPPN) #10/88, which would ensure the protection of historic resources.

Mitigation

The Proposed Actions could result in significant adverse impacts related historic and cultural resources (archaeological resources) and hazardous materials. As noted below, practicable and feasible mitigation has not been identified, and the impacts would remain unmitigated.

Historic and Cultural Resources

Architectural Resources

The Proposed Actions would not result in adverse impacts on architectural resources.

Archaeological Resources

The Proposed Actions could result in significant, adverse impacts on archaeological resources. The archaeological resources impact assessment concludes that although the Proposed Actions would not induce development on sites where development would not have otherwise occurred, they could result in ground disturbance on sites where archaeological remains exist; this disturbance is expected to be limited to a few prototypical analysis sites. Regardless, the ground disturbance could encounter previously unknown archaeological resources. As such, the possibility of significant impacts on archaeological resources cannot be eliminated. Given there are no known development sites at this time, no practical mitigation measures can be identified. Therefore, the Proposed Actions would result in unavoidable, adverse impacts on archaeological resources.

Hazardous Materials

The Proposed Actions would potentially result in significant, adverse impacts related to hazardous materials. The hazardous materials impact assessment concludes that although the Proposed Actions would not induce development on sites where development would not have otherwise occurred, the Proposed Actions could result in ground disturbance on some sites, resulting in a higher potential for impacts related to hazardous materials.

The Proposed Actions would not permit residential development in formerly commercial or manufacturing zones. Therefore, most prototypical analysis sites—which are in residential zoning districts—are unlikely to be located on areas with contaminated soils. For development of prototypical analysis sites in other zoning districts, preparation of a Phase I environmental site assessment may identify Recognized Environmental Conditions (RECs) and recommendation for further testing or remediation. However, preparation of a Phase I environmental site assessment cannot be assumed and would not be required in the as-of-right framework proposed. Because no development sites have been identified at this time, the impacts related to hazardous materials cannot be quantified, and no practical mitigation measures can be identified. Therefore, the Proposed Actions would result in unavoidable adverse impacts related to hazardous materials.

Alternatives

No Action Alternative

The No Action Alternative assumes no discretionary actions and that the Proposed Actions would not be implemented. The significant, adverse impacts on archaeological resources and hazardous materials because of the Proposed Actions would be less likely to occur, or would be otherwise mitigated through existing discretionary review processes under the No Action Alternative. However, because current zoning regulations would remain in place and existing development trends are expected to continue, the No Action Alternative would fail to meet the purpose and need of the Proposed Actions.

No Unmitigated Impacts Alternative

The No Unmitigated Significant Adverse Impact Alternative eliminates the unmitigated, significant, adverse impacts, specifically those to archaeological resources and hazardous materials. Although the alternative would result in no unmitigated impacts, the analysis finds that the alternative would require substantial modifications to the Proposed Actions to the extent that the purpose and need would not be realized. Therefore, because the No Unmitigated Significant Adverse Impact Alternative would not meet the objectives of the Proposed Actions, it is not considered a feasible alternative.

Conceptual Analysis

The conceptual analysis of the proposed discretionary actions concludes that future applications that seek newly created authorizations and discretionary approvals produced by the Proposed Actions have the potential to result in significant, adverse impacts. Because the potential for significant, adverse impacts depends on site-specific conditions and proposed development characteristics, it is difficult to predict the potential for impacts in the absence of specific applications.

It is not possible to predict whether discretionary actions would be pursued on any one site, and each action would require its own separate, future discretionary approvals. Any time an applicant applies for a future discretionary action, the action would be subject to SEQRA, and would conduct environmental review pursuant to *CEQR Technical Manual* guidance.

Unavoidable Significant Adverse Impacts

According to the *2014 CEQR Technical Manual*, unavoidable, significant, adverse impacts are those that would occur if a proposed project or action is implemented regardless of the mitigation employed, or if mitigation is infeasible. As described in the DEIS, the Proposed Actions could result in significant, adverse impacts with respect to archaeological resources and hazardous materials. However, no practicable mitigation measures were identified that would reduce or eliminate these impacts. Therefore, the Proposed Actions could result in the potential for unavoidable adverse impacts with respect to archaeological resources and hazardous materials.

Growth-Inducing Aspects of the Proposed Actions

The *2014 CEQR Technical Manual* indicates that an analysis of the growth-inducing aspects of a proposed action is appropriate when an action:

- Adds substantial new land use, new residents, or new employment that could induce additional development of a similar kind or of support uses, such as retail establishments to serve new residential uses; and/or
- Introduces or greatly expands infrastructure capacity.

The proposed zoning text and map amendments in-and-of-themselves are not expected to induce development or cause a significant change in the overall amount, type, or location of development. The Proposed Actions are not expected to change the rate of growth, which is controlled primarily by the supply of developable land and by the local supply of skilled professionals in the construction industry. The Proposed Actions are not expected to have a substantial effect on the development potential of sites, nor are they expected to modify the current housing development rate within the affected areas. As such, the Proposed Actions would not add substantial new land use, new residents, or new employment that could induce additional development of a similar kind or of support uses. The Proposed Actions would not affect the marketability of a building in any single zoning district over another and thus would not alter general market forces within any single neighborhood. In addition, the Proposed Actions would not greatly expand infrastructure. Therefore, the Proposed Actions would not result in secondary impacts.

Irreversible and Irretrievable Commitments of Resources

Several resources, both natural and built, could be expended in the construction and operation of any development that may result from the Proposed Actions. These resources include building materials used in construction of the project; energy in the form of natural gas, petroleum products, and electricity consumed during construction and operation of the building; and the human effort required to develop, construct, and operate various components of any potential development. These resources are considered irretrievably committed because their reuse for some other purpose would be impossible or highly unlikely.



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