Chapter 2 : ANALYTICAL FRAMEWORK

A. OVERVIEW

This EIS has been prepared in accordance with 6 NYCRR 617.9(b) and Sections 6-08 and 6-12 of Executive Order No. 91 of 1977 as amended (City Environmental Quality Review [CEQR]). This chapter outlines the procedural framework utilized to comply with environmental review regulations and provides an overview of the analytical framework to guide the EIS technical analyses presented in subsequent chapters of this document.

B. CITY ENVIRONMENTAL QUALITY REVIEW PROCESS

Responding to the State Environmental Quality Review Act (SEQRA) and its implementing regulations, New York City has established rules for its environmental review process known as CEQR. The CEQR process provides a means for decision-makers to systematically consider environmental effects along with other aspects of project planning and design, to evaluate reasonable alternatives, and to identify and, when practicable, mitigate significant adverse environmental impacts. CEQR rules guide environmental review through the following steps:

- **Establishing a Lead Agency**. Under CEQR, the "lead agency" is the public entity responsible for conducting the environmental review. Usually, the lead agency is also the entity primarily responsible for carrying out, funding, or approving the proposed project. The Department of City Planning (the "Department" or "DCP") acting as lead agency on behalf of the New York City Planning Commission (CPC) assumed lead agency status for the Proposed Action.
- **Determination of Significance**. The lead agency's first charge is to determine whether the proposed project might have a significant impact on the environment. To do so, DCP prepared an Environmental Assessment Statement (EAS). Based on the information contained in the EAS, DCP determined that the project might result in significant adverse environment impacts and issued a Positive Declaration on February 20, 2015.
- **Scoping.** Along with its issuance of a Positive Declaration, DCP issued a draft Scope of Work for the EIS on February 20, 2015. This draft scope was widely distributed to concerned citizens, public agencies, and other interested groups. "Scoping," or creating the scope of work, is the process of focusing the environmental impact analyses on the key issues that are to be studied. A public scoping meeting was held for the proposed project on March 25, 2015, and additional comments were accepted until April 30, 2015. Modifications to the draft Scope of Work for the project's draft Environmental Impact Statement (EIS) were made as a result of public and interested agency input during the scoping process. A Final Public Scoping Document for the project (which reflected comments made on the draft scope and responses to those comments, as well as updates to the project as the program was further refined), was issued on September 21, 2015.
- **Draft Environmental Impact Statement.** In accordance with the Final Public Scoping Document, a Draft Environmental Impact Statement (DEIS) was prepared. Upon review of the DEIS and determination that the document has fully disclosed the proposed Action, its potential environmental impacts, and recommended mitigation, the Department will issue a Notice of Completion. Once certified as complete, the DEIS will be circulated for public review.
- **Public Review.** Publication of the DEIS and issuance of the Notice of Completion signal the start of the public review period. During this time, which extends for a minimum of 30 days, the public has the opportunity to review and comment on the DEIS either in writing or at a public hearing convened for the purpose of receiving such comments. Where the CEQR process is coordinated with another City process that requires a public hearing, such as ULURP, the hearings may be held jointly. In any event, the lead agency must publish a notice of the hearing at least 14 days before it takes place and must accept written

comments for at least 10 days following the close of the hearing. All substantive comments received at the hearing or during the comment period become part of the CEQR record and are summarized and responded to in the Final Environmental Impact Statement (FEIS). The DEIS public hearing was held on December 16, 2015 at 9:00 am at the National Museum of the American Indian, Alexander Hamilton U.S. Customs House, One Bowling Green in Manhattan. The period for submitting written comments remained open until December 28, 2015.

- **Final Environmental Impact Statement (FEIS).** After the close of the public comment period for the DEIS, the ~~department acting on behalf of the CPC will prepare~~ lead agency has prepared this Final Environmental Impact Statement ~~(FEIS)~~. The FEIS ~~document will~~ includes a summary restatement of each substantive comment made ~~about~~ on the DEIS and a response to each comment. Once the ~~Department has determined~~ lead agency determines that the FEIS is complete, it will issue a Notice of Completion and circulate the FEIS.
- **Findings.** To demonstrate that the responsible public decision-maker has taken a hard look at the environmental consequences of a proposed project, any agency taking a discretionary action regarding a project must adopt a formal set of written findings, reflecting its conclusions about the significant adverse environmental impacts of the proposed project, potential alternatives, and potential mitigation measures. The findings may not be adopted until 10 days after the Notice of Completion has been issued for the FEIS. Once findings are adopted, the lead and involved agencies may take their actions (or take "no action").

C. ANALYSIS YEAR

CEQR requires analysis of the project's effects on its environmental setting. Since typically proposed projects, if approved, would be completed and become operational at a future date, the action's environmental setting is not the current environment but the environment as it would exist at project completion and operation, in the future. Therefore, future conditions must be projected. This prediction is made for a particular year, generally known as the "analysis year" or the "build year," which is the year when the proposed project would be substantially operational.

For generic actions, where the build-out depends on market conditions and other variables, the build year cannot be determined with precision. In these cases, a ten year build year is generally considered reasonable as 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 2025 has been identified for this environmental review.

D. ANALYTICAL APPROACH TO THE EIS

This document uses methodologies, and follows and supplements the guidelines set forth in the *CEQR Technical Manual*, where applicable. These are considered to be the most appropriate technical analysis methods and guidelines for environmental impact assessment of projects in the city.

In conformance with standard CEQR methodology for the preparation of an EIS, this EIS contains:

- A description of the proposed project and its environmental setting;
- The identification and analysis of any significant adverse environmental impacts of the proposed project;
- An identification of any significant adverse environmental impacts that cannot be avoided if the proposed project is developed;
- A discussion of reasonable alternatives to the proposed project;
- An identification of irreversible and irretrievable commitments of resources that would be involved in the proposed project should it be developed; and

- The identification and analysis of practicable mitigation to address any significant adverse impacts generated by the proposed project.

Consistent with *CEQR Technical Manual* guidelines, the Proposed Action is analyzed in this EIS as a "generic action," because there are no known developments that are projected and, due to its broad applicability, it is difficult to predict the sites where development would be facilitated by the Proposed Action. According to the *CEQR Technical Manual*, generic actions are programs and plans that have wide application or affect the range of future alternative policies. Usually these actions affect the entire city or an area so large that site-specific description or analysis is not appropriate. To produce a reasonable analysis of likely effect of the Proposed Action, 27 representative development prototypes have been identified, as described below in Section 2.H of this chapter. The With-Action scenario therefore identifies the amount, type, and location of development that is expected to occur by 2025 as a result of the Proposed Action. The No- Action scenario identifies similar development projections for 2025 absent the Proposed Action. The incremental difference between the two scenarios serves as the basis for the impact analyses.

This environmental review also considers any potential impacts resulting from the cumulative changes across New York City or in specific neighborhoods as a result of the Proposed Action, as well as those associated with the proposed discretionary actions, discussed as a conceptual analysis.

E. METHODOLOGY FOR ANALYSIS

Development affected by the proposal is projected based on trends since 2000. While projections are typically modeled after trends of the previous decade, the look-back period here has been extended to 15 years to capture a broader sample of affordable and senior housing developments across the city. Accordingly, unless otherwise noted, development assumptions in the future with and without the action mirror recent historical development patterns.

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: A discussion of the range of conditions or situations under which the action(s) may take place, so that the full range of impacts can be identified.

As this is a generic action with no specific development sites identified as a result of the Proposed Action, quantifying the effect of the proposal on development is impossible. While each component of this proposal is designed to act in combination with others to facilitate more cost-effective development, this proposal is not in-and-of-itself expected to *induce* development where it would not have occurred absent the Proposed Action (with the exception of one component allowing as-of-right development over certain existing parking lots for affordable senior housing). However, as discussed in the screening analysis, certain components of the proposal may have potential density effects where the Proposed Action would facilitate more units on an individual site over what would be expected under the No Action scenario. Owing to the generic nature of this action, there are no known or projected as of right development sites identified as part of a Reasonable Worst Case Development Scenario. While the specific number and location of additional units facilitated by the Proposed Action cannot be predicted, attempts have been made to determine whether any clusters of increased development might be expected as a result of the Proposed Action.

As part of identifying a reasonable worst case development scenario, the initiatives outlined in *Housing New York* are assumed to be active in the Future With and Without the Proposed Action. The pace of development over the previous 15 years expected to accelerate in the future; Zoning for Quality and Affordability is expected to allow for housing development with fewer constraints.

The only attempt to quantify the effect of the Proposed Action is when development is made possible as a result of the Proposed Action, rather than made easier. This is expected to occur on existing affordable senior housing sites in the Transit Zone where, in the future with the Proposed Action but *not* in the future without the Proposed Action, development would be possible. In all other cases development is expected both with- and without the Proposed Action. The specific type, size, and shape of development would be different.

In some cases, the Proposed Action only affects a certain category of development sites, such as irregular lots, or zoning districts that are mapped in only a few neighborhoods across the city. In these cases, the potential for clustering of development as a result of the Proposed Action is considered more closely. Elsewhere throughout the city, development sites are assumed to be widely dispersed – reflecting a reality that contributes to the challenges of new housing production in New York City today.

By making it easier and more cost effective to develop under the existing zoning framework, ZQA is expected to intensify existing development patterns as outlined in the new buildings analysis in Chapter 1, Project Description. The zoning districts where the most development has occurred over the previous 15 years are expected to see the most development in the Future With and Without the Proposed Action. This proposal is not expected to affect the marketability of a building in any single zoning district over another and thus is not expected to alter general market forces within any single neighborhood. The ZQA proposal is not in-and-of itself expected to induce development on sites where development would not have otherwise occurred. Nor is the type of development expected to differ in the future With versus Without the Proposed Action. However, in the aggregate, more housing units are expected to be developed citywide as a result of building flexibility and cost savings facilitated by this proposal.

The effectiveness of this proposal and all of the components within would rely heavily on the other components of the Mayor's Housing Plan. Absent additional funding, a mandatory inclusionary housing program, 421-a reform, and a host of other initiatives called for in *Housing New York*, the effects of Zoning for Quality and Affordability would be minimal. For the purposes of this environmental review and in order to provide a reasonable worst-case scenario under the Proposed Action, the other components of the Mayor's Housing Plan are assumed to be active during ZQA's projected development period.

F. EFFECT OF PROPOSED ACTION

As discussed in the description of the Proposed Action, this proposal would not result in any change to the underlying zoning districts, but would facilitate more efficient and less costly development of all types of housing, and especially affordable housing. A new set of discretionary actions consider how lot constraints and certain zoning regulations may unnecessarily hamper the development of housing units. As no areas are being rezoned under the Proposed Action, no changes to allowable floor area ratio (FAR) are anticipated as part of this action, with the exception of Affordable Independent Residences for Seniors and Long-Term Care Facilities in certain districts.

Across the city, the Proposed Action is only expected to induce new development or affect the overall amount or type of development in a neighborhood on a very limited basis. There are no known or projected as of right development sites, however, as noted, the individual sites to which Proposed Action would apply would be located throughout the city's five boroughs but cannot be specifically identified for analysis purposes.

Most components of this proposal are not expected to induce development on a lot where development would not also be expected to occur as part of the No Action scenario. In most cases, any additional density expected as part of the With Action proposal is projected to fall well below any CEQR analysis thresholds. Exceptions to this general rule include the proposed as of right ability to develop a new building on an existing affordable senior parking facility within the Transit Zone, and the additional FAR allowed for Affordable Independent Residences for Seniors and Long-Term Care Facilities. The potential for density impacts associated with every component of the proposal are discussed in detail as part of this Environmental Assessment Statement.

The Proposed Action is, for the most part, intended to facilitate better housing within the existing density allowances. For residential buildings in most contextual zoning districts, an additional 5 feet are allowed to provide for more adequate ground floor height. In some districts, 10 or 15 feet of additional height are allowed, which would enable one additional story to accommodate the same amount of floor area permitted today.

Affordable Independent Residences for Seniors and Inclusionary Housing buildings are allowed additional floor area over market-rate units in most zoning districts today, and in the future, more districts would be given the FAR increase. For these buildings, additional flexibility would be allowed to fit all the permitted floor area. This would increase maximum heights for these buildings by 1 to 2 stories in most medium density districts, and 3 to 4 stories in the highest-density districts. In one district commonly mapped on side streets (R7B) no additional height is needed

to fit the permitted FAR for Affordable Independent Residences for Seniors. In another (R8B), no additional FAR is proposed for Affordable Independent Residences for Seniors and thus no additional height is needed.

The Proposed Action to increase permitted building heights substantially increases the flexibility of an architect and developer to design buildings that are cost-effective, attractive from the sidewalk and from inside, and that incorporate contemporary best practices and building techniques. By allowing a certain amount of additional height to each affected zoning district, the building envelope may accommodate:

- better-designed ground floor retail space
- better urban design through increased façade articulation and use of the zoning's court provisions
- higher floor-to-ceiling heights allowing for more light and air into residential apartments
- greater adoption of green technologies, which can reduce energy costs for tenants
- reduce housing construction costs by more easily accommodating less expensive building techniques such as block-and-plank construction

The degree to which the Proposed Action is expected to modify building heights and bulk for market-rate buildings is limited and not likely to result in any new development or floor area over the no action scenario, in all but the tightest existing building envelopes. Furthermore, the additional heights and bulk proposed as part of this action are not significant enough to result in the teardown or redevelopment of an existing building over what might happen in the future without the Proposed Action. Because the added bulk is either for affordable senior housing, which requires subsidy, or long-term care, which is difficult to finance due to the high cost of building and operating this type of facility in New York City, there is no added economic incentive to demolish existing buildings.

The exception to this scenario is on narrow lots in R10 zoning districts and commercial equivalents, where R10 Inclusionary Housing Program off-site affordable housing may be built on a narrow lot with no public subsidy, and is able to achieve the heights permitted through the exemption of "sliver law" for affordable and affordable senior housing, In the future without the action, rent-stabilized units on such lots may be replaced with new developments of market-rate housing. In the future with the action, the affordable and senior developments proposed to be exempted from sliver regulations, and permitted to use the full contextual envelope, are relatively few in number and unlikely to be more economically competitive in replacing existing rent-stabilized residential buildings than such market-rate housing, even when the latter is subject to sliver regulations.

Therefore, the prototypical scenarios modeled as part of this EIS assume the development of lots in both the No Action and the With Action scenarios.

Because the universe of zoning lots expected to be redeveloped under the No Action scenario is substantially the same as the universe of zoning lots expected to be redeveloped under the With Action scenario, no neighborhoods or areas within the city are expected to see a clustering of development as a result of the Proposed Action. Developable lots are widely dispersed across the city and the Proposed Action is not expected to enable development on a lot that would not have been developable in the future without the Proposed Action.

Nevertheless, the Proposed Action is designed to make development of additional housing units more efficient and less costly and, as a result, some additional increment of housing units is projected as part of the Reasonable Worst Case Development Scenario. The prototypical analyses that follow in this report were chosen to illustrate cases where some additional dwelling units may be expected as a result of the Proposed Action.

Section 2G, Screening Analysis, of this chapter identifies each component of the proposal and indicates whether the Prototypical Analysis illustrating the effects of the component project a change in density or building form that may result in environmental impacts.

G. SCREENING ANALYSIS

Components of the proposal with no significant impact

The following components of this proposal have no potential for significant impact. For reasons described below, these components are not in and of themselves expected to have any potential for significant impact on development. They consist of proposals that would affect future mapped areas, which would be subject to their own environmental review at the time of the mapping action, updated definitions to replace terms no longer in use, and clarifications to the zoning resolution to align the language of existing regulations with their intent.

Promote Affordable Independent Residences for Seniors and Long-Term Care Facilities

- Update the definitions for Affordable Independent Residences for Seniors
- Update definitions and use regulations for New York State licensed Long-Term Care Facilities
- Remove terms no longer in use
- Remove special permit 74-903 for domiciliary care facilities for adults
- Modify CPC Special Permit to allow additional bulk for Long Term Care Facilities and certain community facilities in R1 and R2 Districts
- Modify CPC Special Permit to allow additional bulk for certain community facility uses in R3-R9 Districts and certain Commercial Districts

Modernize Rules That Shape Buildings

- Remove or modify unnecessary window noise attenuation regulations
- Clarify and simplify retail and other ground floor regulations
- Clarify use location provisions
- Eliminate Quality Housing study areas

Reduce parking requirements where appropriate for Affordable Housing

- Establish the Transit Zone
- Modify Section 25-25 (A-E) to remove obsolete definitions and requirements
- Modify parking requirement for qualifying affordable housing outside Transit Zone
- Modify parking requirements for affordable housing in single- and two-family zoning districts
- Modify parking requirements for Affordable Independent Residences for Seniors in single- and two-family zoning districts
- Correct inconsistencies in reduced parking for affordable housing

Analysis of components with no significant impact

Update the definitions and use regulations for Affordable Independent Residences for Seniors

Proposal's geographic applicability: n/a

In the future without the Proposed Action, the existing zoning text containing outdated terminology for non-profit residences for the elderly would remain. This text would have no effect on future development because of its obsolescence, but would continue to confuse housing providers who may be uncertain as to whether these requirements apply. In some cases, for-profit developers of affordable senior housing would need to partner with a non-profit to take advantage of the existing zoning benefits for this housing type.

In the future with the Proposed Action, the existing outdated terminology for non-profit residences for the elderly would be replaced with Affordable Independent Residences for Seniors, facilitating a better match with the type of housing that is constructed today. There would not be a need to reorganize the development entity and this may result in avoided time and cost. The economic benefits of this avoided time and cost are difficult to quantify but are not expected to have development-inducing effects.

Therefore, there is no expected change in the number, type, or location of affordable housing developed across the city. The size, shape, or location of development is not expected to change in the With-Action scenario over the No-Action scenario.

No effects would be anticipated as a result of this change. This change would replace the current definition, non-profit residences for the elderly in Use Group 2 with a new term Affordable Independent Residences for Seniors to better reflect current practice in the development of senior housing. This would not generate increases in senior housing, but simply would update the Zoning Resolution to reflect contemporary terminology.

Update definitions and use regulations for New York State licensed Long-Term Care Facilities

Proposal's geographic applicability: n/a

In the future without the Proposed Action, the existing zoning text containing outdated terminology for nursing homes and health related facilities would remain. This would continue to confuse developers who may be uncertain as to whether these requirements apply to other health related facilities that are similar to this definition.

In the future with the Proposed Action, the existing outdated terminology for nursing homes and health related facilities would be replaced with Long-Term Care Facilities, reflecting definitions utilized by regulators in the New York State Department of Health. This change would facilitate a better match with the type of community facilities that are constructed today. There is no expected change in the number, type, or location of Long-Term Care Facilities developed across New York City as a result of this change. The size, shape, and location of development are not expected to change in the With-Action scenario over the No-Action scenario.

No effects would be anticipated as a result of this change. This change would replace the current definition, nursing homes and health related facilities in Use Group 3 with the term Long-Term Care Facilities to be consistent with New York State licensing programs for such facilities and the type of facilities that are built today in New York City. This would not generate an increase in units and would only update the Zoning Resolution to reflect contemporary terminology.

Remove outdated and obsolete definitions

Proposal's geographic applicability: n/a

In the future without the Proposed Action, the existing obsolete references to inactive types of community facilities (sanitariums, domiciliary care facilities) would remain. This text would have no effect on future development, as they are no longer utilized by applicants.

In the future with the Proposed Action, the existing obsolete references to inactive types of community facilities (sanitariums, domiciliary care facilities) would be removed. This would have no effect on future development, as such terms are no longer utilized or recognized by applicants, New York City agencies or New York State agencies.

No effects would be anticipated as a result of this change. Sanitariums and domiciliary care facilities for adults are terms formerly used by the State to describe facility types that no longer exist and are no longer constructed. The removal of these terms would not affect development.

Remove special permit 74-903 for domiciliary care facilities for adults

Proposal's geographic applicability: n/a

In the future without the Proposed Action, no new domiciliary care facilities would be expected to be developed, and no special permit applications to develop them would be expected.

In the future with the Proposed Action, there would be no special permit for domiciliary care facilities for adults. No effects would be anticipated as a result of this change. Domiciliary care facilities no longer exist and are no longer a category recognized or authorized by the NYS Department of Health. As per the proposal, this term would be removed from the Zoning Resolution, thus this permit has no applicability.

Modify CPC Special Permit to allow additional bulk for Long Term Care Facilities and certain community facilities in R1 and R2 Districts

In the future without the Proposed Action, in R1 and R2 districts certain community facility uses with sleeping accommodations would be permitted to utilize the full community facility FAR and lot coverage under Section 24-11 by CPC special permit granted under Section 74-901.

In the future with the Proposed Action in R1 and R2 districts, any community facility use permitted as of right, or any Long Term Care Facility permitted under Section 74-901, would have a similar Special Permit available under Section 74-902 to permit the allowable community facility FAR and lot coverage granted under Section 24-11.

Modify CPC Special Permit to allow additional bulk for certain community facility uses in R3-R9 Districts and certain Commercial Districts

In the future without the Proposed Action, in R3-R9 districts and certain commercial districts, certain community facility uses with sleeping accommodations would be permitted to utilize the full community facility FAR and lot coverage under Section 24-11 by CPC special permit granted under Section 74-901.

In the future with the Proposed Action, a similar Special Permit is proposed to allow the full community facility FAR and lot coverage under Section 24-11 for Long-Term Care Facilities in lower density contextual districts, and philanthropic or non-profit institutions with sleeping accommodations in R3-R9 districts.

Remove or modify window regulations

Proposal's geographic applicability: Special Mixed Use Districts, Special Union Square District, the Special Little Italy District, and the Tribeca Mixed Use District

In the future without the Proposed Action, residential or mixed-use developments in MX districts would be required to provide windows designed for a pre-specified noise attenuation levels (35 dB(A)) that may be overly conservative, depending on the actual site conditions and the surrounding area. Developments utilizing the Quality Housing regulations would be required to provide double-glazed windows whose requirements have been superseded by the Building Code.

In the future with the Proposed Action, residential or mixed-use developments in MX districts would have a process to modify window-wall attenuation level requirements in instances where existing noise conditions in the surrounding area do not warrant the existing requirement. This would eliminate an unnecessary cost of construction. In Quality Housing buildings, developments would have greater flexibility in window choices. There would be no change to the amount, type or location of development.

No effect would be anticipated as a result of this change. The requirement for double glazed windows in the Quality Housing regulations is obsolete and is superseded by the Building Code. In the Special Mixed Use Districts, Special Union Square District, the Special Little Italy District, and the Tribeca Mixed Use District, the proposal would establish a mechanism to modify the window wall attenuation requirement of 35dB(A) through the Mayor's Office of Environmental Remediation, similar to the existing process for (E) designations.

Clarify and simplify retail and other ground floor regulations

Proposal's geographic applicability: Special Districts: Lincoln Square District, Forest Hills District, Harlem River Waterfront District, Hudson Square District, Hudson Yards District, Clinton District, 125th Street District, Downtown Brooklyn District, Downtown Jamaica District, Stapleton Waterfront District, Long Island City Mixed Use District, Union Square District, Willets Point District, Southern Hunters Point District, St. George District, Coney Island District, Enhanced Commercial Districts

In the future without the Proposed Action, developments in applicable areas with ground floor requirements would have overly restrictive, inconsistent or confusing design requirements that may make development excessively costly and, in some cases, does not match the typical context of the ground floors of existing buildings with retail frontage. Slight variations in how façade transparency is calculated, parking wrap requirements, and retail depth requirements would continue to complicate development across the city.

In the future with the Proposed Action, developments in areas with ground floor requirements would be able to construct their ground floors in a more-efficient manner while also permitting the development of ground floors similar to those found in existing buildings on successful commercial streets. Rules would be consistent, rather than having small variations in different areas. The amount and location of development would be unchanged.

No effect would be anticipated as a result of this change that provides a usable set of ground floor regulations to replace the myriad of slightly-varied regulations found throughout the Zoning Resolution.

Clarify use location provisions

Proposal's geographic applicability: Forest Hills District, Harlem River Waterfront District, West Chelsea District, 125th Street District, Long Island City Mixed Use District, Willets Point District, Southern Hunters Point District, Coney Island District, Mixed Use Districts.

In the future without the Proposed Action, mixed buildings in certain special districts would not be able to develop residential and community facility floor area at the same level because the use location provisions inadvertently restrict residential and non-residential floor area.

In the future with the Proposed Action, mixed buildings in certain special districts would be able to develop residential and community facility floor area at the same level of the building. This would permit greater interactivity in such mixed buildings and would match the flexibility currently found in the underlying zoning districts. There would be no change to the amount, type or location of development.

No effect would be anticipated as a result of this change that corrects a series of Special Districts that inadvertently restrict community facility and residential uses on the same floor. This change would bring these districts in line with the underlying zoning regulations.

Eliminate Quality Housing study areas

Proposal's geographic applicability: Study areas: Portions of Soundview and Castle Hill (Bronx); Midwood and Brighton Beach (Brooklyn); Elmhurst/Corona, Forest Hills, and Flushing (Queens), as defined in Zoning Resolution section 23-011.

In the future without the Proposed Action, Quality Housing study areas would continue to be delineated. As specified by the applicable zoning, in R6 and R7 Districts within the study areas where 70 percent or more of the aggregate length of the block fronts containing residential uses are occupied by single-, two-, or three-family detached or semi-detached homes on both sides of the street, the optional Quality Housing bulk regulations would not apply. The block face conditions that trigger restrictions on contextual development are rarely, if ever found.

In the future with the Proposed Action, developments in the former Quality Housing Study Areas would be permitted to utilize the Quality Housing building envelope option without being required to demonstrate that the applicable block face conditions do not exist. Additionally, developments would continue to be able to utilize the basic, or "Height Factor" option. The amount, type, and location of development is not expected to change in the With-Action scenario over the No-Action scenario.

Establish the Transit Zone

Proposal's geographic applicability: n/a

In the future without the Proposed Action there would be no Transit Zone defined in the Zoning Resolution.

In the future with the Proposed Action, a Transit Zone would be defined through zoning text maps that identifies where parking regulations are modified for affordable and senior affordable housing.

The mapping and determination of a Transit Zone definition would not in and of itself have any environmental effects.

Modify Section 25-25 (A-E) to remove obsolete definitions and requirements

Proposal's geographic applicability: n/a

In the future without the Proposed Action, the existing obsolete references to inactive categories of publicly-assisted housing would remain. This would continue to confuse affordable housing developers and the public who may be uncertain as to whether these reduced requirements apply.

In the future with the Proposed Action, the existing obsolete references to inactive categories of public-assisted housing would be clarified, facilitating a better understanding of parking allowances by affordable housing developers and the public. There is no expected change in the number, type, or location of affordable housing developed across New York City.

The Proposed Action would remove from Section 25-25 any references to obsolete programs that are unclear or are no longer active.

Modify parking requirement for qualifying affordable housing outside Transit Zone

Proposal's geographic applicability: all, outside Transit Zone

In the future without the Proposed Action, new affordable housing units would continue to be subject to the parking requirements as outlined in Section 25-25. Columns A, B, C, and E would continue to reference obsolete programs, and the majority of developments would be expected to apply under Column C, which has the lowest requirements by zoning district. Only approximately a dozen wholly affordable housing developments have been established outside the area proposed as the Transit Zone in the previous 15 years, and development in the future without the action would be expected to continue at this pace. These sites would be widely dispersed throughout the city, primarily in Queens and Staten Island.

In the future with the Proposed Action, new affordable housing units would continue to be built in multifamily zoning districts, with parking requirements generally consistent with what is known under the No-Action scenario as Column C in Section 25-25. This represents no measurable change over the No-Action scenario, as most affordable housing today is built pursuant to Column C. Based on historical trends, approximately 10 wholly affordable housing developments would be expected to be developed outside of the Transit Zone in the future without the Proposed Action. These sites would be widely dispersed throughout the city, primarily in Queens and Staten Island. The amount, type, and location of development are not expected to change in the With-Action scenario over the No-Action scenario.

Modify parking requirements for affordable housing in single- and two-family zoning districts

Proposal's geographic applicability: R1, R2, R3-1, R3A, R3X, R4-1, R4A, R4B, R5A

In the future without the Proposed Action, no new affordable housing units are expected to be built in single- or two-family zoning districts. The reduced parking requirements specified in Section 25-25 of the Zoning Resolution have no practical relevance.

In the future with the Proposed Action, no new affordable housing units are expected to be built in single- or two-family zoning districts. There would no longer be reduced parking requirements for affordable housing in these districts.

Affordable housing is not currently developed in single- or two-family districts, so the alignment of affordable housing parking requirements with the underlying regulations would simply provide consistency in the Zoning Resolution and would not affect the amount, type or location of development.

Modify parking requirements for Affordable Independent Residences for Seniors in single- and two-family zoning districts

Proposal's geographic applicability: R1, R2, R3-1, R3A, R3X, R4-1, R4A, R4B, R5A

In the future without the Proposed Action, no new non-profit residences for the elderly would be expected to be built in single- and two-family zoning districts, rendering the reduced parking requirements unnecessary for this type of housing in these districts.

In the future with the Proposed Action, no new Affordable Independent Residences for Seniors would be expected to be built in single- and two-family zoning districts, rendering reduced parking requirements unnecessary for this type of housing in these districts.

Affordable Independent Residences for Seniors are not currently developed in single- or two-family districts, so the alignment of affordable housing parking requirements with the underlying regulations would simply provide consistency in the Zoning Resolution and would not affect the nature of development.

Correct inconsistencies in reduced parking for affordable housing

Proposal's geographic applicability: Special St. George District and Queens Community Board 14

In the future without the Proposed Action, new income-restricted housing units would be subject to parking requirements that are higher than zoning intended.

In the future with the Proposed Action, new income-restricted housing units would be subject to the requirements of Section 25-25 of the Zoning Resolution for their mapped zoning district.

Both geographies are outside the Transit Zone and would thus still require parking for affordable and affordable senior housing. However, the parking requirements would be better aligned with the needs of the residents for whom they apply.

Components of the Proposal with Potential Density Effects

The following components of this proposal have the potential for impacts related to density. Density related effects include land use, zoning and public policy; socioeconomic conditions; community facilities; open space; water and sewer infrastructure; solid waste and sanitation services; transportation; air quality; and noise.

Promote Affordable Independent Residences for Seniors and Long-Term Care Facilities

- Update floor area ratio maximum for Affordable Independent Residences for Seniors
- Update floor area ratio maximum for New York State-regulated Long-Term Care Facilities
- Remove density factors for Affordable Independent Residences for Seniors and certain UG2 Long-Term Care Facilities
- Revise certifications and special permits for Long-Term Care Facilities in R3-R10 districts

Modernize Rules That Shape Buildings

- Adjust height controls in moderate- and high-density districts
- Create more-efficient building setback rules
- Remove unnecessary corner lot coverage restrictions
- Permit residential accessory uses on ground floors in rear yards for developments in an IHDA mapped area, or an affordable independent residence for seniors
- Provide a more balanced building transition rule
- Adjust height controls for inclusionary housing and Affordable Independent Residences for Seniors
- Remove narrow lot restrictions
- Create new lower-density bulk envelope for Affordable Independent Residences for Seniors and Long-Term Care Facilities (R3-R5)
- Modernize density factor in R8 through R10 districts
- Update unit size requirements
- Provide improved yard and coverage regulations for shallow lots
- Update outdated distance between buildings regulations

Reduce parking requirements where appropriate for Affordable Housing

- Eliminate parking requirements for qualifying affordable housing within the Transit Zone
- Eliminate parking requirements for Affordable Independent Residences for Seniors within the Transit Zone
- Permit elimination of existing affordable senior parking within the Transit Zone

- Modify parking requirements for Affordable Independent Residences for Seniors to 10 percent in multifamily zoning districts outside the Transit Zone.

Components of the Proposal with Potential Building Form Effects

The following components of this proposal have the potential for impacts related to building bulk and form. Building bulk and form related effects include shadows; historic and cultural resource; urban design and visual resources; neighborhood character; natural resources; hazardous materials; noise; and air quality.

Promote Affordable Independent Residences for Seniors and Long-Term Care Facilities

The components of the proposal that are intended to alter the bulk envelope of buildings with Affordable Independent Residences for Seniors or Long-Term Care Facilities are discussed under the "Modernize Rules that Shape Buildings" section below.

- Update floor area ratio maximum for New York State licensed Long-Term Care Facilities
- Update floor area ratio maximum for Affordable Independent Residences for Seniors and Long-Term Care Facilities
- Allow higher densities for Affordable Independent Residences for Seniors in R7X and R7-3 districts
- Provide a framework for mixing of Use Group 2 residences with certain Use Group 3 community facilities

Modernize Rules That Shape Buildings

- General building envelope modifications
- Adjust height controls in moderate- and high-density districts for general residential uses
- Create more-efficient building setback rules
- Remove unnecessary corner lot coverage restrictions
- Provide a more balanced building transition rule
- Enhanced building envelopes for inclusionary and affordable senior housing
- Remove narrow lot restrictions
- Adjust height controls for Inclusionary Housing
- Adjust height controls for AIRS and LTC facilities
- Create a new higher-density non-contextual building envelope for certain types of housing on zoning lots adjacent to certain types of infrastructure – Long-Term Care facilities
- Create new lower-density bulk envelope for Affordable Independent Residences for Seniors and Long-Term Care Facilities (R3-R5)
- Encourage variety and better design flexibility
- Provide greater clarity and design opportunities in street wall regulations
- Match street wall line-up provision requirements to intent
- Provide more-useable court regulations
- Modernize density factor and unit size requirements
- Encourage elevated residential ground floors
- Flexibility for constrained lots
- Provide improved yard and coverage regulations for shallow lots
- Rationalize street wall requirements for acutely-angled sites
- Provide additional flexibility for irregular topography
- Update outdated distance between buildings regulations

Reduce Parking Requirements Where Appropriate for Affordable Housing

- Eliminate parking requirements for Affordable Independent Residences for Seniors within the Transit Zone
- Eliminate parking requirements for qualifying affordable housing within the Transit Zone
- Permit elimination of existing affordable senior parking within the Transit Zone
- Modify parking requirements for Affordable Independent Residences for Seniors to 10 percent in multifamily zoning districts far from transit

Analysis of components with density effects and/or building form effects

The following discussion addresses the components of this proposal where density- or bulk-related impacts may be significant. Density related effects include land use, zoning and public policy; socioeconomic conditions; community facilities; open space; water and sewer infrastructure; solid waste and sanitation services; transportation; air quality; and noise. Building bulk and form related effects include shadows; historic and cultural resources; urban design and visual resources; neighborhood character; natural resources; hazardous materials; noise; and air quality. As this proposal requires a generic analysis of the effects of any single component, prototypical cases have been developed to analyze the reasonable worst-case scenarios in this proposal. Each component of the proposal that has the potential to result in impacts refers the reader to a prototypical case that has been modeled to show the effects of the No Action and With Action scenarios.

Promote Affordable Independent Residences for Seniors and Long-Term Care Facilities

The following components of the proposal have the potential to result in significant density-related adverse impacts. The components of the proposal that have the potential to result in significant building form-related adverse impacts for Affordable Independent Residences for Seniors and Long-Term Care facilities are discussed in the Modernize Rules That Shape Buildings section below.

Provide a framework for mixing of Use Group 2 residences with certain Use Group 3 community facilities

Proposal's geographic applicability: R3-2, R4, R5, R6, R7-1, except R4A, R4B, R4-1, and R5D

In the future without the Proposed Action, in cases where Use Group 2 residences and certain Use Group 3 community facilities (Long-Term Care and non-profit institutions with sleeping accommodations) wanted to mix in the same building or on the same zoning lot, the developer would not have clarity regarding merging the rules that apply to these different uses. It would continue to be unclear how to apply the Quality Housing requirements and floor area deductions to buildings that include these community facilities, as permitted in Zoning Resolution section 28-00. Additionally, it would continue to be unclear how to allocate shared common space to the maximum floor area ratio for each use.

In the future without the Proposed Action, these community facility uses in buildings that contain residences would continue to be subject to the limitations of Zoning Resolution section 24-162, which establishes maximum floor area ratios and special floor area limitations for zoning lots containing residential and community facility uses in certain districts, even when those community facility uses have primarily residential attributes.

In the future with the action, the restrictions listed in section 24-162 would be removed. There would be clarity about the application of rules when use group 2 residences and certain use group 3 community facilities (Long-Term Care and non-profit institutions with sleeping accommodations) are mixed on the same zoning lot and therefore, these projects would be easier to develop. This would encourage the mixing of residences with residential-like community facilities, potentially allowing for a beneficial mix of uses. The Proposed Action would continue to limit the community facility floor area to the 24-111 FAR for NPISAs and the applicable senior housing FAR for Long-Term Care Facilities. The combination of NPISA and residence would be no larger in terms of floor area.

This change proposes to clarify the regulations that apply to cases where Use Group 2 residences are mixed with certain Use Group 3 community facility uses (Long-Term Care and non-profit institutions with sleeping accommodations). These uses are permitted to mix today, but regulations do not provide guidance regarding the application of the separate rules applied to portions the same building. This would not induce new development or additional floor area, but simply would provide clarity those wishing to build this type of housing. The uses would be permitted in separate buildings on the same zoning lot or on separate zoning lots. Clarifying the rules for Quality Housing deductions may result in slight increases in the overall bulk.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototype 26 illustrates the effects of mixing Use Group 2 and Use Group 3 within the same building.

As the Proposed Action could affect the shape of development, there may be some building form effects caused by the change, but the amount and location of development would be unchanged.

Update floor area ratio maximum for Affordable Independent Residences for Seniors

Proposal's geographic applicability: R5B, R6B, R7D, R7X, R7-3 R8-R10

In the future without the Proposed Action, Section 23-147 pertaining to non-profit residences for the elderly maximum floor area would remain unchanged. Development of NPRFEs would continue at its current pace. Data from the NYU Furman Center shows that a total of 38 HUD-202 senior housing projects were constructed between 2000 and 2010, out of a total number of 202 HUD-202 projects in New York City since 1990. Citywide, since 2000 only 2,800 new affordable apartments for seniors have been constructed. While there are other subsidy and regulatory programs that provide "non-profit residences for the elderly" in New York City, the HUD-202 program is a primary source, and the most comprehensive inventory of the past construction of NPRFE uses. HUD-202 projects since 2000 were built in all five boroughs, with the majority in the Bronx, Brooklyn and Manhattan. The number of units per project range from 6 to 109 units with an average of 67 units per building. The total number of units constructed in NYC during this 10 year period through the HUD 202 program was 2,532. The previous 10 year period, between 1990 and 1999, 5,273 HUD 202 units were constructed.

HUD 202 projects were built in a range of districts, but primarily in R6, R6A and R7-1/R7-2 districts throughout the city, where they are able to utilize the FAR incentive. It is expected that, in the future without the Proposed Action, Affordable Independent Residences for Seniors would continue to be developed in the zoning districts where they have an FAR incentive.

However, while non-profit residences for the elderly are permitted a higher maximum FAR than typical residential uses (non age- or income-restricted housing), NPRFE are given the same height limits as typical residential uses that have a lower maximum FAR. In many cases, non-profit residences for the elderly have been unable to construct the full FAR that they are permitted through zoning. In the future without the Proposed Action, there would continue to be a need for discretionary actions, each of which is subject to its own environmental review. These cases are detailed as part of this document, which describes City Planning Commission authorizations where such projects were permitted to exceed the height and setback regulations established in Section 23-631.

New HUD 202 projects are not being funded, and the only current source of funding for new Affordable Independent Residences for Seniors is HPD's SARA program. SARA production is dependent on future funding, but the Mayor's housing plan has set a goal of 500 new affordable units for seniors per year, or 5,000 over ten years, representing a modest increase over past HUD 202 housing production. In the future without the Proposed Action, SARA would be less effective due to obsolete and unworkable zoning provisions.

In the future with the Proposed Action, changing the floor area ratio maximums in Section 24-147 would expand the current framework for allowing higher FARs for Inclusionary Housing in high-density zoning districts, in addition to where the bonus is already available in moderate-density districts. This could encourage the construction of affordable senior housing to be more widely distributed throughout the city, or to be included as a portion of another building with a mix of other residential or non-residential uses. The specific districts where the Proposed Action would increase the allowable floor area permitted for non-profit residences for the elderly, include R6B, R7D, R7X, R7-3 and R8-R10. In these districts, Affordable Independent Residences for Seniors (currently non-profit residences for the elderly) would be permitted to build a higher FAR. Additionally, the building envelope would be expanded for this type of housing, allowing for more flexibility in how the FAR fits on site. These changes would obviate the need for many of the discretionary actions sought under the existing framework.

Although demand for affordable senior housing is increasing, the development of affordable senior housing is driven by the availability of public funding and subsidy and the availability of appropriate (and affordable) land, all of which are currently scarce. However, while the HUD-202 program is not currently funded, HPD's Senior Affordable Rental Apartments (SARA) program has been funded to make loans to non-profit and for-profit developers of affordable senior housing. The program provides project-based rental assistance for tenants age 62 and older earning up to 60% AMI, and would pay up to 30% of their income toward rent. As a result of these initiatives, the development of affordable senior housing is expected to proceed at the pace enabled by available funding, in the future with- and without the Proposed Action. In the future with the Proposed Action, the development of affordable senior housing

units is expected to increase slightly due to eased regulatory constraints and lower development costs. This increase would be spread throughout the city, and it would be difficult to identify which specific units are the incremental units enabled by the regulatory changes of the Proposed Action.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototypes 6, 8, 20, 22, 24, 25, and 27 model the increase in floor area ratios in high density residential districts for Affordable Independent Residences for Seniors.

The Proposed Action would result in additional FAR for affordable independent residences in high-density districts across the city, as compared to the No-Action condition. As a result, the potential for density related impacts is analyzed in this Environmental Impact Statement.

Households headed by seniors overall have far fewer density-related effects than other non-senior households. Seniors are generally retired from the workforce and therefore use fewer city services and infrastructure than the typical city resident. Senior residences generally have a high frequency of single occupancies and the absence of families with children. Seniors are not expected to have school-aged children, and therefore affordable senior housing does not create a demand for school seats and residents of affordable housing for seniors have low car ownership and generate few auto trips at peak times.

Nevertheless, the Proposed Action would result in additional FAR for affordable independent residences and Long-Term Care Facilities in high-density districts across the city, as compared to the No-Action condition. As a result, the potential for density related impacts is analyzed in this Environmental Impact Statement.

Update floor area ratio maximum for New York State licensed Long-Term Care Facilities

Proposal's geographic applicability: R3-R10

In the future without the action, Section 24-111 would continue to specify the maximum floor area ratio for nursing homes and assisted living facilities that qualified as Use Group 3 non-profit institutions with sleeping accommodations. Assisted living facilities that did not qualify as community facilities would be subject to the underlying floor area ratio for the applicable residence district. Development of Long-Term Care Facilities would continue at a slow pace. Data from the New York State Department of Health on state licensed Long-Term Care Facilities shows that a total of 19 licensed facilities were constructed between 2000 and 2014, out of a total number of 254 facilities that are currently licensed in New York City, since 1990. In zoning, the current terminology for this use is outdated and only refers to "nursing homes and health related facilities." The proposal recommends replacing this term with a new, broader term, "Long-Term Care Facilities" in order to recognize the range of such facilities that are constructed and licensed today. The data presented in this analysis includes the following state licensed Long-Term Care Facilities: nursing homes, assisted living programs, and enriched housing programs. Since 2000, Long-Term Care Facilities have been built in all five boroughs, with the majority in the Brooklyn, Queens and Manhattan. The number of beds per project range from 30 to 280 beds with an average of 133 beds/building. The total number of units constructed in NYC during this 15 year period was 2,524. The previous 15 year period, between 1980 and 1995, 6,740 licensed Long-Term Care beds (in 36 facilities) were constructed.

Long-Term Care Facilities were built in a range of districts, but primarily in R4, R6 and R7-1/R7-2 districts throughout the city. In current zoning, nursing homes and health related facilities are considered community facilities, but are not permitted the full community facility FAR (24-11) as-of-right; the as-of-right maximum FAR for nursing homes (24-111) is lower and similar to the underlying residential FAR. Nursing home and Long-Term Care Facilities have significant spatial programmatic requirements that are derived from the State's standards and market demand for amenities and services. Analysis of the floor plans of example project suggest that the average of such amenity and services spaces can be as much as 60 percent of the entire project, leaving less than half of the total facility available to sleeping quarters. Service and amenity spaces are also very costly to operate, yet enhance the quality of life for residents and the community. As a result of these substantial requirements, many such facilities are not able to construct or modernize without a discretionary zoning action that permits additional floor area beyond that of Section 24-111. At least 8 facilities applied for special permits for increase bulk pursuant to ZR 74-902 since 2000. This permit allows additional floor area as well as taller buildings to accommodate the additional floor area. The

history of these permits is discussed in Section 1H, Purpose and Need, which describes City Planning Commission Certifications and Special Permits where such projects were permitted to exceed the height and setback regulations established in Section 74-902. In the future without the action, this would continue to be a common occurrence, adding costs to the development and enlargement of these facilities and delaying the availability of needed services

The Proposed Action would increase the maximum floor area ratios for Long-Term Care Facilities in R3-2 to R10 districts, except R3-1, R3A, R3X, R4-1, R4A, R5A, R5B and R5D. This higher maximum FAR would be consistent with that for Affordable Independent Residences for Seniors (see table in Section 1I, Proposed Action). Since 2000, 2,060,691 square feet of floor area was constructed at State licensed Long-Term Care Facilities. This is a calculation of total floor area built, and may not only include Long-Term Care residential bedrooms, but also includes clinical service space, circulation, social accessory rooms, and other additional support spaces required for operation.

In the future with the Proposed Action to increase FAR and height limits as-of-right for Long-Term Care the City could expect to see a small increment of additional housing. Allowing a higher floor area ratio would permit new development on smaller lots, reducing land costs, or the enlargement of existing sites that are at the maximum FAR under the existing condition. While this in and of itself can be expected to be development inducing, the actual increment is likely to be driven more by funding than by zoning changes, since funding constraints establish the number of beds in Long-Term Care Facilities that are constructed.

The increase in development is expected to be scattered throughout the city, and it would be difficult to identify which specific Long-Term Care Facility beds represent the increment enabled by the Proposed Action. New developments might be slightly larger in certain districts but overall citywide, Long-Term Care Facilities represent a small amount of residential community facility space distributed throughout the city and the likelihood of any development site favoring this type of housing over another is not expected to change in the future with or without the Proposed Action.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototypes 9, 23 and 26 model the change in floor area ratio maximums for Long-Term Care Facilities.

The proposed change to allow increased floor area may lead to some increase in beds of Long-Term Care, for which effects are analyzed with regards to all density-related impact categories.

Remove density factors for Affordable Independent Residences for Seniors

Proposal's geographic applicability: R3-2, R4, R5, R6-R10 multifamily zoning districts

In the future without the Proposed Action, density factors for Affordable Independent Residences for Seniors would continue to apply. The effect of complying with density requirements in the Zoning Resolution are difficult to quantify, given requirements for common areas in these developments. Nevertheless, some nonprofit residences for the elderly have sought density waivers, indicating that the density requirements do sometimes conflict with best practices for affordable senior housing design, which call for small average unit sizes to reduce rents and simplify housekeeping. Recently, an application to rezone a City-owned site, and waive (through zoning override) the density factor, as well as parking and open space requirements, was approved for 67 income- and age-restricted units at 54-25 101st street in Corona, Queens (C 150125 ZMQ). HANAC, the project sponsor, sought an increase of one dwelling unit over what was permitted (66 DUs) under the existing density factor, and the override for this and other components of their application was approved. No such override is available for developments on privately-owned sites.

Owing to the Mayor's Affordable Housing Plan and the commitment to build more affordable senior housing, is expected that the overall rate development would increase slightly over the rate seen in the previous 15 years, when roughly 38 developments with 2,800 total units were constructed across the city, in the future without the Proposed Action. Zoning would continue to hamper the development of such housing, resulting in higher costs and less efficient construction based on contemporary best practices and unit size standards for this type of housing.

In the future with the Proposed Action, density factors for Affordable Independent Residences for Seniors would be removed, enabling developers of this type of housing to build units in the most efficient way for their program. Affordable senior housing would not be subject to a density factor or minimum unit size in zoning, allowing other regulations and programmatic needs to control unit density and appropriate unit sizes for this use. This would allow for a range of unit sizes, and for more affordable and more appropriately sized units for seniors, while being offset by more generous community spaces.

The Proposed Action is not expected to result in the development of additional buildings for Affordable Independent Residences for Seniors over the No Action. However, it is likely that the developments that would be built would house some number of additional units for low income seniors, as their unit sizes would not be limited by outdated zoning regulations.

In the future with the Proposed Action, more affordable senior developments are expected to take as-or-right advantage of density allowances, similar to those granted to the Corona development, which are only obtainable by Mayoral override and other waivers under the future without the action.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototypes 16, 24, 25, 27 model the potential effect of the removal of density factors for Affordable Independent Residences for Seniors and certain Long-Term Care facilities.

Households headed by seniors overall have far fewer density-related effects than other non-senior households. Senior residences generally have a high frequency of single occupancies and the absence of families with children. Seniors who reside in this type of affordable housing do not have children who attend school, and therefore they do not create a demand school seats. Residents of affordable housing for seniors rarely own cars and tend not to drive at peak times. While it is expected that the proposed changes would not have adverse development effects as per the CEQR impact categories because of the minimal density effects of senior households, potential effects are evaluated based on the additional units that may be produced as a result of the Proposed Action.

Revise certifications and special permits for Long-Term Care Facilities in R3-R10 districts

Proposal's geographic applicability: R3-R10

This change would remove Section 22-42, which is a certification that applies to nursing homes to determine whether a proposed development or enlargement is located in a community district of relative concentration; and also remove the special permit in Section 74-90, and modify the special permit in Section 74-902, to allow nursing home development to occur as-of-right in R3-R10 districts, regardless of the characteristics of the community district.

In the future without the Proposed Action, zoning would continue to require certifications and, in some cases, special permits for nursing home developments and enlargements. These existing provisions would continue to unnecessarily burden nursing home development and discourage new construction or enlargements to existing nursing homes. Nursing home development costs would be additionally burdened by the cost and time required to apply and complete these certifications, special permits and their requirements. Facilities for which a need had been certified by the New York State Department of Health would experience undue delays in serving their target populations.

In the future without the Proposed Action, nursing homes and other Long-Term Care Facilities wishing to develop or enlarge within a Community District where there is a relative concentration of facilities would be required to seek a Special Permit demonstrating that the proposed facility would have a use and bulk that fits within the surrounding community. This special permit was developed as a reaction to historic conditions that saw a boom in nursing home construction in certain areas during the 1970s. Today, and in the future without the Proposed Action, the special permit serves little purpose in protecting against community impacts, but does create a procedural hurdle and increased time and expense to applicants. The Commission would continue to lack ongoing oversight of nursing homes, which the State DOH has, and would thus continue to defer to the DOH's judgment that the facility is in fact needed. The State would continue to serves a similar role that was originally sought by the 1973 certifications and special permits by the Commission.

In the future with the Proposed Action, Long-Term Care Facilities seeking to develop in any residential district other than R1 or R2 would no longer need to seek a special permit if they are located in a community district with a relative concentration of nursing home beds. This would speed the development and enlargement of some nursing homes, and make but funding would remain the major constraint. Nursing homes in community districts that do not have a relative concentration of nursing home beds would no longer be subject to the 22-42 certification.

The development of nursing homes is controlled by the State's Certificate of Need process which issues licenses based on needs and services available in a community, and available funding or financing for such a project. Nursing homes would be developed and enlarged more quickly, speeding the delivery of needed services to seniors.

Based on historical trends and Special Permit applications since 2000, as outlined in Section 1H, Purpose and Need, it is expected that approximately 34 new or renovated nursing homes would be developed as a result of the Proposed Action, and would be expected to take less time to develop as a result of fewer barriers in the future with the Proposed Action. As a result of the ZQA proposal alone, new or renovated nursing homes would need less time to complete following the granting of a Certification of Need by the New York State Department of Health. Long-term care is a very constrained industry with rigorous regulations, high costs and limited funding.

Overall citywide, Long-Term Care units represent a small amount of residential community facility space that is distributed across the city. Given growing demand for this facility type, and decreased regulatory barriers, it is anticipated that, with the Proposed Action, a modest increase in development over historical trends would occur. Because nursing homes in community districts of relative concentration would no longer be subject to discretionary review, and because a modest amount of additional development is expected as a result of the Proposed Action, a CEQR analysis is required.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototype 9 models the potential effect of allowing the development of Long-Term Care facilities without needing to seek a special permit.

Households headed by seniors overall have far fewer density-related effects than other non-senior households. Senior residences generally have a high frequency of single occupancies and the absence of families with children. Seniors who reside in this type of affordable housing do not have children who attend school, and therefore they do not create a demand school seats. Residents of long-term care facilities rarely own cars and tend not to drive at peak times. While it is expected that the proposed changes would not have adverse development effects as per the CEQR impact categories because of the minimal density effects of senior households, potential effects are evaluated based on the additional units that may be produced as a result of the Proposed Action.

Modernize Rules That Shape Buildings

General building envelope modifications

Most developments in NYC can construct the maximum permitted floor area within the current as-of-right Quality Housing building envelope, though this floor area may be accommodated in an expensive, inefficient manner. As demonstrated in Prototype 1 among others, the No-Action and With-Action developments are both able to accommodate their full permitted floor area, though the No-Action building accomplishes this by utilizing sub-optimal building practices.

However, in limited instances, or when buildings utilize best housing design practices today, some floor area may not be developed. Some examples were identified in the Citizens' Housing and Planning Council report, *The Building Envelope Conundrum*[9]. While these sites would only be accommodating the floor area already permitted on the site and analyzed in previous environmental analyses, it is not possible to conclude where and to what extent such additional development might occur. Detailed descriptions of the proposal to modify general building envelopes are below.

[9] Citizens Housing Planning Council, 2014, http://chpcny.org/2014/06/building-envelope-conundrum/

Adjust height controls in moderate- and high-density districts for general residential uses

Proposal's geographic applicability: R5D-R10 contextual districts, excluding "B" districts

In the future without the Proposed Action, development would be expected to occur at the same pace that occurs today. Based on development trends over the previous 15 years as shown in Chapter 1, Project Description, and the Mayoral commitment to develop more housing in the future, over 1200 buildings would be expected to be developed in the affected zoning districts over the next 15 years. While most of them would be able to fit their permitted floor area within the existing building envelope, many would be forced to contend with significant constraints in designing the building. This would result in flat buildings with no façade articulation or setback from the street, minimum permitted floor to ceiling heights for residential units, and inadequate ground floor retail ceiling heights. These buildings would be expected to be widely dispersed across Manhattan, the Bronx, Queens and Brooklyn, and a small number would be expected on the north shore of Staten Island. A subset of buildings would be expected to be underbuilt, providing articulation, setbacks, and better floor to ceiling heights, but sacrificing floor area for the ability to do so. Some buildings would be forced into the least desirable situation, in which the full permitted floor area is not achieved despite sub-optimal design.

In the future with the Proposed Action, developments in moderate and high density zoning districts would be able to utilize new height controls and therefore would be able to construct their permitted floor area in a more efficient manner, resulting in taller buildings with better floor to ceiling heights and more appealing ground floor retail spaces.

This component of the proposal is expected to be wide reaching, affecting all new developments in widely mapped contextual districts across the city. Based on development trends of the previous 15 years outlined in Chapter 1, Project Description, roughly half of all new residential development is expected to occur in contextual zoning districts with the proposed height changes. Yet, as described in the Proposed Action, the effects of the height changes are modest for buildings without Inclusionary, affordable or senior housing. The benefits of the additional height for general residential uses include better ground floor retail and lobby spaces, and more desirable floor to ceiling heights, in line with development trends in the city's historic contextual neighborhoods.

The likelihood of more than a couple of developments on any single block, or several within a multi-block radius, is relatively low across the affected zoning districts. The city's medium- and high-density zoning districts are largely built out, and development sites are typically widely scattered across a neighborhood. Moreover, adjusting height controls for residential uses to allow them to better fit their permitted FAR is not expected to result in a substantial incremental increase in population within a neighborhood over the no action scenario at any individual site, so even where development sites may be adjacent to one another, the incremental increase in population remains limited. Because the Proposed Action is not allowing more density but, rather, enabling the current permitted densities to be better accommodated on a development site, it is not expected to result in a clustering of construction over the no action scenario.

Prototypical Analysis

Because it is not possible to identify specific development sites, prototypical sites have been chosen to illustrate the effects of the Proposed Action. Prototypes 1-5, 10, 12, 13, 14, and 23, demonstrate the effects of this Proposed Action.

As demonstrated in Prototype 1, the No-Action and With-Action developments are both able to accommodate their full permitted floor area, though the No-Action building accomplishes this by utilizing sub-optimal building practices.

However, in limited instances, or when buildings utilize best housing design practices today, some floor area may not be developed. While these sites would only be accommodating the floor area already permitted on the site and analyzed in previous environmental analyses, it is not possible to conclude where and to what extent such additional development might occur. Therefore, the possibility of building form and density-related impacts are analyzed in this Environmental Impact Statement.

Create more-efficient building setback rules

Proposal's geographic applicability: R6-R10

In the future without the Proposed Action, the upper floors of residential buildings would be inefficient and costly to develop. In addition, buildings would be likely to be developed directly at the street wall in an attempt to minimize the effects of these provisions on their upper floors.

In the future with the Proposed Action, the upper floors of residential buildings would be able to be designed in a more-efficient manner. In those districts where it is permitted, the option to set the building off of the property line to create a more residential street character with ground floor plantings would more likely be chosen since there is no longer an inherent penalty in doing so.

It is expected that new buildings in the affected districts would take advantage of this provision where the existing setback requirements pose structural or economic challenges to development. As already discussed, it is not possible to identify development sites in the affected districts, but the effects of this action in isolation is modest.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototypes 1-7, 9-15, 17-19 and 23, model developments that utilize the proposed changes to setbacks.

The Proposed Action would result in modified building forms in developments throughout the city, as compared to the No-Action condition. This could include, as demonstrated in the various prototypes, buildings constructed to a range of higher heights, with greater articulation on the ground floor and above. These provisions, both individually and in concert, are analyzed in this Environmental Impact Statement as potential building form related impacts.

Remove unnecessary corner lot coverage restrictions

Proposal's geographic applicability: R6-R10

In the future without the Proposed Action, buildings on high density corner lots would develop their floor area in an inefficient manner because of the maximum coverage requirement. In addition, these buildings would not be able to fully wrap the corner like more-traditional corner buildings. Rectangular city blocks typically have four corner lots; the vast majority in the affected districts are already built out and would not be expected to be redeveloped in the future without the Proposed Action. Undeveloped corner lots that might be developed are widely scattered across Manhattan, the Bronx, Queens, and Brooklyn, and a small number are in northern Staten Island.

In the future with the Proposed Action, undeveloped corner lots would be able to utilize their floor area in a more-efficient manner because of the removal of the maximum corner coverage requirement. In addition, it is more likely that these developments would wrap the corner with the building massing and therefore create a more-traditional corner building. An effect of the wrapping allowance would be higher floor to ceiling heights, and also somewhat shorter buildings, as the floor area would be allocated over a larger building footprint, allowing for improved street wall continuity. As this could affect the amount and type of development, there may be some density or building form effects caused by the change. As development is dispersed over wide areas of the city, the location of development would remain unchanged under the With-Action scenario.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototypes 3, 17 and 21 model developments utilizing changes to corner lot coverage requirements.

The Proposed Action would result in modified building forms in developments throughout the city, as compared to the No-Action condition. This could include, as demonstrated in the various prototypes, buildings constructed to a range of higher heights, with greater articulation on the ground floor and above. These provisions, both individually and in concert, are analyzed in this Environmental Impact Statement as potential building form related impacts.

Permit residential accessory uses on ground floors in rear yards for affordable developments in an IHDA mapped area, or an affordable independent residence for seniors

Proposal's geographic applicability: R6-R10, excluding "B" districts

In the future without the Proposed Action, nonprofit residences for the elderly and affordable housing in IHDA mapped areas would be able to include parking, community facility, or commercial space (in districts where permitted) in the rear yard area. However, buildings would not be able to include residential accessory uses in the rear yard area, and there would continue to be no requirements that rear yards be planted or accessible to residents. Additionally, the 4 percent requirement for recreation space for NPRFEs and the Quality Housing recreation space requirement would continue to be unintentionally additive.

In the future with the Proposed Action, Quality Housing developments would be able to include residential accessory space on the ground floor in the rear yard area, extending the privilege currently given to community facility space and accessory parking, as well as commercial space, where permitted. Such uses would therefore be allowed to encroach into the rear yard, encouraging the provision of these spaces in a more attractive and functional configuration than is possible under current zoning.

Additionally, in the future with the Proposed Action, allowing the recreational space required by Quality Housing regulations, and currently exempted from floor area calculations, to count towards the 4 percent of recreational space required for Affordable Independent Residences for Seniors would clarify the treatment of exempted recreational space for senior housing. By making the requirement consistent across all types of multifamily residences, the Proposed Action avoids unnecessary costs. While the added costs are difficult to quantify, the cost savings are not expected to be development-inducing. Developments today can already provide community facility and commercial space, as well as parking, in the rear yard area on the ground floor. Extending this privilege to accessory would therefore have no effect on development or building form. Nevertheless, the cost and space savings may result in a slight amount of additional density, especially when utilized in concert with other components of this proposal, and thus are analyzed as part of this document.

Provide a more balanced building transition rule

Proposal's geographic applicability: R6-R10

In the future without the Proposed Action, developments on lots affected by this provision would be required to limit the scale of building portions next to the adjacent lower-density districts. Most of these buildings would be located on corner lots, since for interior lots any encroachment abutting a low-density district is limited by the required rear yard. Based on historical development trends and existing zoning districts, these buildings would be expected to be dispersed along high-density corridors in the neighborhoods in the north Bronx, in Astoria, Jackson Heights and Corona, Queens, along corridors like Jamaica Avenue and 101st Avenue in Queens, and areas including Kings Highway and Ocean Avenue in Brooklyn, on lots within 25' of a low density zoning district. Their ability to fit their permitted FAR would be hampered by existing limits to development adjacent to a low density district, and corner lot coverage requirements.

In the future with the Proposed Action and in concert with the proposed changes to corner lot coverage regulations, developments on lots affected by the existing provision would be able to incorporate permitted floor area in the transition area adjacent to the lower-density district, allowing for the full utilization of the development site's FAR in a more-efficient manner. While it is not possible to determine the precise locations of development in affected districts, new buildings could be expected to be developed in a more efficient manner in the future with the Proposed Action – especially where they occur on corner lots, with the revised regulations under the Proposed Action. As with the No-Action scenario, these buildings would be expected to be dispersed along high-density corridors in the neighborhoods in the north Bronx, in Astoria, Jackson Heights and Corona, Queens, along corridors like Jamaica Avenue and 101st Avenue in Queens, and areas including Kings Highway and Ocean Avenue in Brooklyn.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototypes 3 and 17 model developments on higher-density lots adjacent to lower-density districts that utilize the proposed transition rule.

In limited instances, or when buildings utilize best housing design practices today, some floor area may not be developed. While these sites would only be accommodating the floor area already permitted on the site and analyzed in previous environmental analyses, it is not possible to conclude where and to what extent such additional

development might occur. Therefore, the possibility of both building form and density-related impacts is analyzed in this Environmental Impact Statement.

Remove narrow lot restrictions

Proposal's geographic applicability: R7-2, R7D, R7X, R8, R9, and R10 Inclusionary Housing or Affordable Independent Residences for Seniors built pursuant to Quality Housing regulations

In the future without the Proposed Action, developments on narrow lots in certain medium- and high-density zoning districts would be unable to construct their full permitted floor area because of existing restrictions on buildings on lots less than 45 feet in width. As shown in Prototype 15, which represents a reasonable worst case on a wide street in this regard, 48.6 percent of the permitted floor area cannot be constructed because of the existing provisions.

In the future without the Proposed Action, Quality Housing developments on lots that are less than 45 feet wide would be restricted to the width of the street or, depending on the height of surrounding buildings, to the height of surrounding buildings. In districts where the maximum height limit for these buildings is higher than the existing regulations for narrow lots would allow, developments on narrow lots would have difficulty in fully utilizing their permitted floor area. Inclusionary housing developments or Affordable Independent Residences for Seniors would be unable to utilize their maximum permitted FAR, and height controls for narrow lots would continue to be an impediment to the development of new affordable housing.

It is not possible to quantify the number of development sites that would be unable to build to their maximum permitted FAR due to this redundant height control. However, based on development trends of the previous 15 years, it is expected that some small number of lots less than 45' wide and within an Inclusionary Housing Designated Area or R10 Inclusionary zoning district and participating in the IH program might be redeveloped in the future without the Proposed Action. These would be primarily located in Manhattan and portions of the Bronx, and would be limited in height by the width of the street or the height of the lowest adjacent building.

In the future with the Proposed Action, Quality Housing developments participating in the Inclusionary Housing Program or building Affordable Independent Residences for Seniors on narrow lots less than 45' wide would be permitted to develop to the applicable height limit of the underlying district. Even with the combination of programs underway to develop more affordable housing, significant development and funding constraints remain, especially on narrow lots in the city's highest density districts. Therefore, only a small subset of the narrow lots in the affected districts, would be expected to utilize the modified zoning to reach their maximum height under Inclusionary Housing or AIRS, but zoning would no longer be an impediment to such development. Developments in Historic Districts would continue to be subject to Landmarks Preservation Commission review.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototype 15 models a narrow 40' x 100' interior lot on a wide street in an R10A district.

The Proposed Action could affect the amount and type of development by allowing buildings to reach their full FAR potential without requiring them to assemble sites. Therefore, there may be some density or building form effects caused by the change. These development sites would be limited to Affordable Independent Residences for Seniors, Inclusionary Housing Designated Areas or R10 districts where Inclusionary Housing is applicable.

Adjust height controls for Inclusionary Housing

Proposal's geographic applicability: R6-R10, excluding "B" districts

In the future without the Proposed Action, developments attempting to utilize the Inclusionary Housing program's higher floor area ratio could face difficulty in constructing the fully permitted square footage, or they would develop the available floor area in a sub-optimal or inefficient building. Given the commitment to build more affordable housing, it is expected the in the future Without the Proposed Action, the rate of development of Inclusionary Housing would increase to meet the Mayor's housing goals. Many would be expected to fit their permitted FAR within the building envelope; however, they would only be able to do so by providing sub-standard floor to ceiling

heights, and boxy facades with no articulation or setbacks. A small subset would be expected to be underbuilt, unable to fit their permitted FAR within the building envelope, even with architectural modifications.

In the future with the Proposed Action and in concert with the various housing initiatives, more affordable housing developments would be able to construct the full permitted floor area utilizing best practices. Although funding would likely continue to be the primary barrier to the development of affordable housing in the future with the Proposed Action, a subset of those that would be developed in the future without the Proposed Action would be slightly larger and better able to fit their permitted floor area, while still ensuring adequate ground level floor to ceiling heights for commercial space or residential entryways.

While it is not possible to determine how many affordable housing developments would be able to construct their full permitted floor area in a more efficient building as a result of the proposal, it is expected that the change to the allowable building envelope for these buildings would encourage a small incremental number of new housing units in the future with the Proposed Action. This increment would be dispersed throughout the city's applicable zoning districts, and it is difficult to identify which specific units represent the increment.

Prototypical Analysis

Because it is not possible to identify specific development sites, prototypical sites has been chosen to illustrate the effects of the Proposed Action. Prototypes 17, 18, 19, 21 model sites demonstrating the effects of the proposed height changes for Inclusionary housing.

Under the Proposed Action, developments would be able to construct the full permitted floor area utilizing best practices. While these sites would only be accommodating the floor area already permitted on the site that was already analyzed in previous environmental analyses, it is not possible to conclude where and to what extent such additional development might occur. Therefore, the possibility of density-related impacts is analyzed in this Environmental Impact Statement.

Adjust Height Controls for Affordable Independent Residences for Seniors and Long-Term Care Facilities

Proposal's geographic applicability: R6-R10, excluding "B" districts

In the future without the Proposed Action, zoning would not accommodate the permitted senior housing FAR. In some cases, discretionary actions would be available that enable developments to escape zoning constraints; in other cases, funding would not permit utilization of the full FAR in any case. While non-profit residences for the elderly would be permitted a higher maximum FAR than typical residential uses (non age- or income-restricted housing), both contextual and non-contextual senior housing developments would face development constraints: developments in contextual districts, and especially on interior lots with less flexibility than corner lots, would be hampered by a restrictive contextual building envelope that does not allow most to achieve their full permitted FAR.

Developments in non-contextual districts would be hampered by complex open-space requirements which mandate a tall building with a small floor plate that is inefficient, costly to build, and not appropriate for affordable senior housing and Long-Term Care Facilities. This problem would be expected to persist in the future without the Proposed Action.

Additionally, in non-contextual zoning districts, affordable senior housing or care developments in some instances would not have an efficient or workable alternative to the contextual envelope in the future without the Proposed Action, and would thus be unable to construct their fully permitted floor area.

In the future with the action, a more flexible building envelope would permit utilization of the full allowable FAR for these developments. Funding would remain a constraint but the achievement of the full permitted FAR is likely to happen in a greater percentage of cases. Other developments would avoid the time and cost of discretionary reviews, and have more resources to put towards more housing, or better services to residents.

In non-contextual districts, a workable contextual building envelope would be available in the future with the Proposed Action, making it easier to develop the full permitted FAR for AIRS and Long-Term Care Facilities where the Quality Housing building option is not appropriate.

The Mayor's Housing Plan, coupled with additional funding, will further work to increase the amount of affordable senior housing that gets developed. While such funding is expected in both the future with and without the Proposed Action, with the Proposed Action, a small increase in the number of units may be further facilitated by reduced development costs.

The combination of changes as part of this Proposed Action, including use definitions, FAR increases, changes to density factors, building envelope and parking requirements would, in combination, are expected to allow a greater number of affordable senior housing units to be built over the future without the Proposed Action.

Prototypical Analysis

Because it is not possible to identify specific development sites, prototypical sites has been chosen to illustrate the effects of the Proposed Action. Prototypes 6, 7, 9, 11, and 23 model sites demonstrating the effects of the Proposed Action.

Under the Proposed Action, developments would be able to construct the full permitted floor area utilizing best practices. While these sites would only be accommodating the floor area already permitted on the site that was already analyzed in previous environmental analyses, it is not possible to conclude where and to what extent such additional development might occur. Therefore, the possibility of density-related impacts is analyzed in this Environmental Impact Statement.

Create a new higher-density non-contextual building envelope for certain types of housing on zoning lots adjacent to certain types of infrastructure– Affordable Independent Residences for Seniors

Proposal's geographic applicability: R6-R8 (non-contextual districts)

In the future without the Proposed Action, AIRS developments in non-contextual zoning districts adjacent to elevated rail or other infrastructure would be required to utilize the Quality Housing regulations since the underlying height factor envelope and open space ratio is inappropriate for this housing type, requiring a tall, narrow building with a small footprint that is contrary to the ideal configuration for affordable senior housing. As shown in Prototype 8, a building utilizing these regulations would not be able to develop its full permitted floor area under the existing as-of-right provisions. While the contextual Quality Housing regulations would have permitted this floor area to be better accommodated, the building form poorly matches its context because of the existing rail line.

In the future with the Proposed Action, Affordable Independent Residences for Seniors in high-density non-contextual zoning lots adjacent to elevated rail lines or other elevated infrastructure would have a second building envelope option beyond the current Quality Housing building regulations, which would provide more overall flexibility. The locations of these developments would be expected to be dispersed and widespread across the city, in areas where such infrastructure exists. These include corridors zoned R6-R8 non-contextual along the MTA's elevated subway lines in parts of the Bronx, Queens, Brooklyn and Staten Island, elevated railroads such as the Metro North in Manhattan and the Bronx, and Long Island Railroad in Brooklyn and Queens, and corridors along elevated highways or highway cuts, such as the Cross Bronx Expressway and the Long Island Expressway.

Prototypical Analysis

Because it is not possible to identify specific development sites, prototypical sites has been chosen to illustrate the effects of the Proposed Action. Prototypes 8 and 20 model sites demonstrating the effects of the Proposed Action.

The Proposed Action would result in developments that are more appropriate to their surroundings. As this could affect the shape of development, there may be some building form effects caused by the change, but the amount and location of development on non-contextual zoning lots adjacent to infrastructure would be unchanged.

Create a new higher-density non-contextual building envelope for certain types of housing on zoning lots adjacent to certain types of infrastructure– Long-Term Care Facilities

Proposal's geographic applicability: R6-R8 (non-contextual districts)

In the future without the Proposed Action, certain community facilities including nursing homes, in non-contextual zoning districts adjacent to elevated rail or other infrastructure would be subject to the regular or alternate 1961 zoning envelopes which have a maximum height at the street line or front yard line, in some cases a required setback

at the street line, and a sky exposure plane. The 1961 zoning envelopes have inconsistent results depending on the site. For example, a through-lot site can be much taller than an interior-lot site.

In the future with the Proposed Action, Long-Term Care Facilities in high-density non-contextual zoning districts adjacent to elevated rail lines or other elevated infrastructure would have the building envelope options available to Affordable Independent Residences for Seniors, which would provide more overall flexibility. This includes the envelope that is proposed for AIRS developments in R6-R8 districts and adjacent to infrastructure. The locations of these developments would be expected to be dispersed and widespread across the city, where such conditions exist. These include corridors zoned R6-R8 non-contextual along the MTA's elevated subway lines in parts of the Bronx, Queens, Brooklyn and Staten Island, elevated railroads such as the Metro North in Manhattan and the Bronx, and Long Island Railroad in Brooklyn and Queens, and corridors along elevated highways or highway cuts, such as the Cross Bronx Expressway and the Long Island Expressway.

Prototypical Analysis

Because it is not possible to identify specific development sites, prototypical sites has been chosen to illustrate the effects of the Proposed Action. Prototype 20 models a site adjacent to a rail line, demonstrating the effects of the Proposed Action.

The Proposed Action would result in developments that are more appropriate to their surroundings. As this could affect the shape of development, there may be some building form effects caused by the change, but the amount and location of development non-contextual zoning lots adjacent to infrastructure would be unchanged.

Create new lower-density bulk envelope for Affordable Independent Residences for Seniors

Proposal's geographic applicability: R3-2, R4 and R5, without letter or number suffix

In the future without the Proposed Action, non-profit residences for the elderly in would be unable to construct their full permitted floor area because underlying height and setback regulations do not accommodate this floor area. These developments would either have to utilize existing discretionary actions to receive a workable zoning envelope, or would have to develop less than their permitted floor area in an inefficient configuration. As a result of the unduly restrictive zoning, it would be expected that approximately a dozen applications for City Planning Commission authorization to permit NPRFEs to exceed the height and setback regulations in R3-2, R4 and R5 districts would be submitted over the next ten years.

In the future with the Proposed Action, developments in these zoning districts providing Affordable Independent Residences for Seniors would be able to develop their full permitted floor area with an as-of-right zoning envelope. In most instances, this would alleviate the need for the development to seek a discretionary approval from the City Planning Commission and therefore make this form of housing easier and less costly to build. It is therefore likely that the number of such developments in low-density districts would increase, but the increase would be limited by the availability of funding, even with the Mayor's Housing Plan. The increases would be expected to be dispersed across the city's low-density multifamily zoning districts and is not expected to be clustered in any one area.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototypes 24, 25 and 27 model affordable senior housing developments in lower density non-contextual districts.

While the Proposed Action would make it easier to develop senior housing, it is unlikely to have density effects at a local level. As described above, seniors overall have far fewer density-related effects than other non-senior households. However, since it is not possible to conclude where and to what extent such additional development might occur, the possibility of density-related impacts is analyzed in the Environmental Impact Statement.

Create new lower-density bulk envelope for Long-Term Care Facilities

Proposal's geographic applicability: R3-2, R4 and R5, without letter or number suffix

In the future without the Proposed Action, nursing homes and certain other community facilities would be subject to the 1961 zoning envelope which has a maximum height at the front yard line, a required setback, and a sky

exposure plane. The 1961 zoning envelopes have inconsistent results depending on the site. For example, a through-lot site can be much taller than an interior-lot site.

In the future with the Proposed Action, Long-Term Care Facilities in the affected districts would be permitted to utilize the bulk regulations for Affordable Independent Residences for Seniors. Long-Term Care Facilities would be able to develop their full permitted floor area with an as-of-right zoning envelope that is sufficiently flexible to meet their needs. The increase in development would be facilitated by a combination of eliminating the use special permit and more as-of-right FAR. The change in the envelope would not have such an effect since the community facility envelope accommodates the current low as-of-right FAR. Because of the variety of factors that contribute to the development of these facilities, it is not possible to quantify the effects of this component of the proposal, but it is likely that the number of developments in the applicable districts would increase somewhat over the no action scenario

In the future with and without the Proposed Action, Long-Term Care Facilities in R3, R4 and R5 districts *with* a letter or number suffix would continue to utilize the existing community facility bulk regulations of ZR Section 24-00.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototype 26 models a lower-density non-contextual Long-Term Care facility.

While the Proposed Action would make it easier to develop Long-Term Care Facilities, it is unlikely to have density effects at a local level. As described above, seniors overall have far fewer density-related effects than other non-senior households. However, since it is not possible to conclude where and to what extent such additional development might occur, the possibility of density-related impacts is analyzed in the Environmental Impact Statement.

Encourage building variety and better design flexibility

Provide greater clarity and design opportunities in street wall regulations

Proposal's geographic applicability: R6-R10

In the future without the Proposed Action, developments would have a limited ability to provide building articulation because of unclear or strict regulations. This constraint often results in generally flat, uninteresting buildings. High density commercial districts with residential equivalents, would continue to have a 100% street wall requirement, forcing them to build at the street line.

In the future with the Proposed Action, developments would have a clearer means of providing building articulation. High density commercial districts and residential equivalents would be permitted up to 50% of their façade to be recessed up to 3' of the street wall, allowing the construction of more varied buildings more in keeping with the character of existing more-traditional residential buildings. The proposal would clarify where the street wall must be located (pursuant to line-up provisions). This initial street wall location would allow for a 12" deviation to allow for minor articulation, such as structural expression. Secondly, the proposal would stipulate that wherever the street wall is located, in all districts, up to 50 percent of the street wall may project (within the limits of the property) or be recessed up to 3'. Finally, in A, D and X districts, up to 30 percent of the street wall would be permitted to be recessed to the minimum setback distance (unless located within an outer court). This 30 percent allowance for a deeper recess would not be cumulative with the 50 percent allowance.

In order to facilitate elevated ground floor units in Residence Districts, the proposal would stipulate that deeper recesses can be utilized to accommodate exterior ramps and provide handicap accessibility to the building lobby as described further below.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototypes 1, 2, 3, 12, 13, 14, 17 and 23 model this component of the Proposed Action.

As the Proposed Action could affect the amount and shape of development, there may be some building form effects caused by the change, but the amount and location of development would be unchanged.

Match street wall line-up provision requirements to intent

Proposal's geographic applicability: R6-R10 contextual districts, and for Quality Housing buildings on wide streets in non-contextual R6 and R7 districts without a letter suffix

In the future without the Proposed Action, developments located on contextually-zoned blocks with deeply set back non-contextual buildings would be required to comply with setback rules that exacerbate a condition of non-contextual buildings. By allowing buildings in some districts to set back their front building wall up to 15' from the street line, in order to match the street wall of an adjacent building, a contextually zoned block may develop in a non-contextual manner.

Also in the future without the Proposed Action, developments in the highest density commercial and equivalent residential districts (R9, R10) would continue to have no clarity in the zoning resolution as to the street wall and setback requirements for developments on narrow streets.

In the future with the Proposed Action, developments in R6A, R7A, R7B, R7D, and R7X districts would not need to set back more than 10' from the street wall, regardless of the setback of the adjacent buildings. This would result in developments that are more contextual with their surroundings. At the same time, R6B, R7B and R8B districts would allow new developments up to 3' of setback regardless of the street wall of the adjacent buildings, in order to permit some articulation and architectural features between the building and the sidewalk.

Also in the future with the Proposed Action, developments in the highest density residential districts (R9 and R10) would refer to the setback requirements of other "A" districts in the zoning resolution, providing guidance and clarity as to the street wall and setback requirements for developments on narrow streets.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototypes 1, 2, 3, 12, 13, 14, 17 and 23 model this component of the Proposed Action.

As the Proposed Action could affect the amount and shape of development, there may be some building form effects caused by the change, but the amount and location of development would be unchanged.

Provide more-useable court regulations

Proposal's geographic applicability: R6-R10

In the future without the Proposed Action, developments have limited flexibility to utilize the existing court provisions because of the need to use the full zoning envelope to accommodate permitted floor area. This limits building articulation and overall visual interest. Courts are limited to shallow and inflexible configurations.

In the future with the Proposed Action, court regulations are more flexible and create buildings with more articulation and overall visual interest. These buildings would be more in keeping with the character of existing more-traditional residential buildings.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototypes 1, 2, 3, 12, 13, 14, 17 and 23 model this component of the Proposed Action.

As the Proposed Action could affect the amount and shape of development, there may be some building form effects caused by the change, but the amount and location of development would be unchanged.

Encourage elevated residential ground floors

Proposal's geographic applicability: R6-R10

In the future without the Proposed Action, developments that provided elevated ground floor residences would be penalized for providing accessible interior ramps or stairs since they would count as floor area. Those providing exterior ramps or stairs would either be restricted or have unclear regulations pertaining to providing ground floor recesses for such access.

In the future with the Proposed Action, there would be an incentive to provide the required access inside the building, and greater ability to provide them outside the building in ground floor recess areas The floor area exemption of 100 square feet for each foot the ground floor is raised above curb level to accommodate an interior ramp in the residential lobby, and the revision to permitted recesses that would typically be large enough to accommodate a ramp on the exterior of the building, would make it more likely that developments would provide elevated ground floor residences. Raising the ground floor units would likely result in buildings with greater overall visual interest.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototypes 1, 2, 3, 12, 13, 14, 17 and 23 model this component of the Proposed Action.

As the Proposed Action could affect the amount and shape of development, there may be some building form effects caused by the change, but the amount and location of development would be unchanged.

Modernize density factor for R8-R10 Quality Housing buildings

Proposal's geographic applicability: R8-R10 Quality Housing

In the future without the Proposed Action, residential buildings in high-density zoning districts (R8 through R10) would not be permitted the same flexibility in overall unit mix within a building that is granted to developments in medium density districts, because of the increased density factor requirement. R8 districts would be limited to a Density factor of 740, and R9 and R10 districts to 790.

Under the Proposed Action, residential developments utilizing the Quality Housing regulations in high-density zoning districts would be able to utilize the 680 density factor already permitted in medium-density zoning districts. As a result, residential buildings utilizing the Quality Housing regulations would be able to provide a greater diversity of unit sizes in the overall building. At the same time, residential buildings in high-density zoning districts (R8 through R10) would have the flexibility to provide a greater number of units in the same amount of residential floor area.

While the Proposed Action would permit additional units in buildings in these districts, it is unlikely that this would have a significant effect on most high-density developments in the city. Most recent construction in these districts is providing a larger average dwelling unit size and so is not coming into conflict with the density factor calculation. An analysis by DCP of five residential buildings constructed since 2010 in Downtown Brooklyn, an area with R8-R10 equivalent zoning where new housing is reported in the media to be catering to small households, shows that buildings there have an average density factor of approximately 900 square feet, with average residential unit sizes at about 850 square feet. Given this, it is unlikely that the Proposed Action would have significant density effects at a local level. Most buildings would continue to provide residential units that are, on average, larger than currently required and it would only be in limited instances that buildings in high-density districts would utilize the greater flexibility afforded by this proposed change. However, since it is not possible to conclude where and to what extent such additional development might occur, the possibility of density-related impacts is analyzed in this Environmental Impact Statement.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototype 16 models the effect of updating the density factor regulations for R8-R10 districts.

The modification to the density factor in high-density zoning districts may, in some cases, result in a modest number of additional units. Therefore, the potential for density-related impacts is analyzed as a result of this action.

Update unit size requirements

Proposal's geographic applicability: R6-R10 Quality Housing

In the future without the Proposed Action, residential buildings utilizing the R6-R10 Quality Housing regulations would not be able to include any residential units smaller than 400 square feet, limiting the overall diversity of units permitted.

In the future with the Proposed Action, residential units would no longer be limited to a minimum dwelling unit size of 400 square feet; instead, unit dimensions would refer to the NYC Building Code and Housing Maintenance Code and the state Multiple Dwelling Law. These establish an effective minimum unit size of about 275 square feet for a studio apartment.

As a result, residential buildings utilizing the Quality Housing regulations would be able to provide a greater diversity of unit sizes in the overall building. At the same time, and in concert with the changes to density factors, residential buildings in high-density zoning districts (R8 through R10) would have the flexibility to provide a greater number of units in the same amount of residential floor area.

While the Proposed Action would permit smaller units in Quality Housing buildings, it would not result in more units over the No Action scenario, because dwelling unit density is controlled by the density factor. In R8 through R10 districts, the effects of changes to the density factor are assessed separately.

By removing the 400 square foot minimum unit size from the Quality Housing regulations, developments would only be able to provide a greater diversity of unit types, while the overall total number of permitted residential units in the development would remain unchanged.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototypes 8, 16 and 20 model the effects of updating unit size requirements for R6-R10 Quality Housing.

The modification to the unit sizes, in tandem with other changes proposed as part of this project, may occasionally result in a modest number of additional units. Therefore, the potential for density-related impacts is analyzed as a result of this action.

Provide improved yard and coverage regulations for shallow lots

Proposal's geographic applicability: R6-R10

In the future without the Proposed Action, buildings on shallow lots between 70' and 95' depth would be granted no relief for yard and coverage requirements that were designed for generic 100-foot-deep lots. This makes it difficult to fit all the permitted floor area in an efficient building and generally forces the building to be developed directly on the street line. On shallow through lots with a depth between 140' and 190', the same problem presents itself when two buildings are developed on opposite street frontages. There are relatively few development sites meeting these conditions, however, in the future without the Proposed Action, those that do would be expected to develop a sub-standard building in order to fit their permitted FAR; others would be expected to obtain variances to facilitate more efficient buildings on these lots as a result of their constraints.

In the future with the Proposed Action, developments on shallow lots would have greater opportunity to construct all their permitted floor area in a more efficient manner. Under the Proposed Action, residential developments on shallow lots would be able to take advantage of modified yard and coverage regulations that better take into account their less typical shallow condition, resulting in a modest increase in development on these sites.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototypes 4, 5, 18 and 19 model the effects of the Proposed Action.

As demonstrated in Prototypes 4 and 5, the No-Action and With-Action developments are both able to accommodate their full permitted floor area, though the No-Action building accomplishes this by utilizing sub-

optimal building practices, with little design flexibility. Nevertheless, it is expected that there are limited unforeseen instances when some floor area may not be developed in the No-Action condition.

Shallow lots and shallow through lots are found consistently across all neighborhoods in all five boroughs, making it impossible to conclude where and to what extent such additional development might occur. Therefore, although these sites would only be accommodating the floor area already permitted on the site and analyzed in previous environmental analyses, the possibility of density-related impacts is analyzed in this Environmental Impact Statement.

Rationalize street wall requirements for acutely-angled sites

Proposal's geographic applicability: R6-R10

In the future without the Proposed Action, buildings on acutely-angled corners in certain zoning districts would be granted little relief from existing street wall requirements making development on these lots inefficient, particularly in high-density commercial districts. The 100 percent street wall requirement in these districts makes it difficult to provide a chamfered corner in an acute angle, resulting in more costly development, and apartment layouts that are impractical.

While it is not possible to determine the number of development sites citywide on irregular lots in the affected districts, acutely angled lots are typically found along streets that cut diagonally across the standard grid. Some limited number of new buildings would be expected to be constructed as of right in the future without the Proposed Action, while others might be expected to obtain variances to facilitate more efficient buildings on these lots as a result of their constraints.

In the future with the Proposed Action, developments on acutely-angled lots with corners of up to 75 degrees would have greater opportunity to construct all their permitted floor area in a more-efficient manner, and make some small number of sites more likely to be developed over the No-Action scenario.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototype 21 models the effects of the Proposed Action.

The Proposed Action would result in modified building forms in developments throughout the city, as compared to the No-Action condition. This could include, as demonstrated in the various prototypes, buildings constructed to a range of higher heights, with greater articulation on the ground floor and above. As this could affect the amount and type of development, there may be some density or building form effects caused by the change, but the location of development would be unchanged.

Provide additional flexibility for irregular topography

Proposal's geographic applicability: R6-R10

In the future without the Proposed Action, buildings on sites with irregular topography would continue to utilize the existing topography provisions, which, in some instances, makes developments on these lots inefficient. In the future without the Proposed Action, the threshold at which a sloping base plane can be established to sites with a 10 percent grade change between the front and rear wall. To make development feasible on lots with a slope of less than 10 percent, developers would continue to divide a building into multiple segments, each with a separate datum for measuring height, provided the street wall is at least 15 feet wide.

In the future with the Proposed Action, developments with irregular topography would have greater opportunity to construct their floor area in a more-efficient manner. To provide an extra measure of flexibility for sites with irregular terrain, for zoning lots in R6-R10 Residence Districts and their Commercial equivalents, the proposal would modify the threshold at which a sloping base plane can be established to sites with a 5 percent grade change between the front and rear wall.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototype 27 models the effects of the Proposed Action.

The Proposed Action would result in modified building forms in developments throughout the city, as compared to the No-Action condition. This could include, as demonstrated in the various prototypes, buildings constructed to a range of higher heights, with greater articulation on the ground floor and above. As this could affect the amount and type of development, there may be some density or building form effects caused by the change, but the location of development would be unchanged.

Update outdated distance between buildings regulations

Proposal's geographic applicability: R6-R10

In the future without the Proposed Action, developments on zoning lots with multiple buildings would be required to comply with the existing overly restrictive distance between building requirements, as defined in Zoning Resolution Section 23-711. This section requires a minimum distance between a portion of a building with dwelling units and any other building on the same zoning lot. On zoning lots where two buildings have an average height of 50 or more feet, the minimum distance between legally required windows in the two buildings is 60 feet. This exceeds the requirements of the state Multiple Dwelling Law and makes infill development more difficult to undertake, or makes buildings taller as their footprint is limited to small areas of the zoning lot. The proposed change would make the treatment of multiple buildings on the same zoning lot more like that of buildings on separate zoning lots, within the constraints of state law. Zoning lots for which this update would apply include "height factor" developments, where existing buildings are separated by an open space. There are not many zoning lots with this configuration and with the capacity to fit an additional building on site, given existing FAR allowances and the existing distance between building requirements. Few sites would be expected to accommodate infill development in the future without the Proposed Action.

In the future with the Proposed Action, the minimum distance between buildings between 25 and 125 feet tall would be reduced from 60 feet, to 40 feet, to bring zoning regulations in line with the Multiple Dwelling Law. This provision would extend to buildings 125 feet tall or higher when their aggregate lot coverage does not exceed 40 percent. This may enable infill development on sites with lot and floor area allowances, and may enable modest horizontal enlargements of existing buildings on lots with multiple buildings. As a result, there would be a greater likelihood of "height factor" zoning lots being able to configure and configure their permitted floor area in a more-efficient manner to facilitate construction of new buildings, where the amount of open space exceeds what is required. The change would also be necessary to make the proposed reduction in the required rear yard equivalent effective for shallow through lots where a building is developed on each street frontage.

The Proposed Action is expected to make it marginally easier to provide infill development on sites with the capacity for additional development, but the Proposed Action is not expected to result in widespread infill development over the No Action scenario. Additional constraints include FAR maximums, open space ratios, other uses, and funding limitations.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototypes 10 models the development of a new building on a 200' x 200' corner lot with an existing building on site, in an R7A district.

As demonstrated in Prototype 10, there are instances where developments are not able to develop their fully permitted floor area in the No-Action condition, even with the use of sub-optimal building practices. As shown in the With-Action condition, the Proposed Action affords the opportunity to construct a higher percentage of the floor area permitted on the lot.

While the Proposed Action would make it easier to develop housing, it is unlikely to have density effects at a local level. The number and location of zoning lots with available floor area and sufficient area to construct a new building, even with the Proposed Action, is limited in medium- and high-density districts in the city. However, since it is not possible to conclude where and to what extent such additional development might occur, the possibility of building form or density-related impacts is analyzed in this Environmental Impact Statement.

Reduce parking requirements where appropriate for Affordable Housing

Eliminate parking requirements for qualifying affordable housing within the Transit Zone

Proposal's geographic applicability: R3-2, R4, R5, R5B, R5D, R6-R10

In the future without the Proposed Action, new affordable housing units would continue to be subject to the parking requirements as outlined in Section 25-25. Columns A, B, C, and E would continue to reference obsolete programs, and the majority of developments would be expected to apply under Column C, which has the lowest requirements by zoning district. Waivers would be available to some developments with a small lot size or a small number of required parking spaces, as defined in Sections 25-241 and 25-26 in the Zoning Resolution. Developments on city-owned land would also utilize zoning overrides in some cases.

As outlined in Chapter 1E, Background, since 2000, approximately 142 new developments comprised entirely of affordable units have been constructed in New York City, amounting to nearly 6,000 total affordable units. An additional 330 buildings have been built that include some units that are income restricted. This number was derived through analysis of data collected and disseminated by New York University's Furman Center, which "brings together multiple data sources to provide information on thousands of privately-owned, subsidized rental properties in New York City" (http://datasearch.furmancenter.org/). Data sources include NYC Department of Housing Preservation and Development, NYC Housing Development Corporation, the NYS Homes and Community Renewal, and the U.S. Department of Housing and Urban Development.

Of the roughly 472 developments containing affordable housing and built between 2000 and 2014, approximately 70 were built within geographies that have no current parking requirements, and would thus have no parking required in the future without the Proposed Action. These geographies include Manhattan CDs 1-8, of the Special Downtown Brooklyn District and Long Island City, Queens. Based on the site characteristics of historic development, the majority of new affordable housing developments in the future without the Proposed Action would be expected to have an option to waive their parking requirements, because the development would occur on a lot that is below the threshold for which parking is required, because the development would generate too few units to require parking, or because the development (on a city-owned site) was able to obtain a Mayoral override for the parking requirement. A developer may subdivide a lot in order to reduce its size below the threshold for which parking is required.

Mayoral overrides enable developments on city-owned sites to provide less parking than are otherwise be required by zoning. About a dozen affordable housing developments on city-owned sites in recent years have been developed with parking overrides, citing excessive cost and/or loss of buildable or amenity space with the provision of parking. For example, the CPC report for the disposition of city-owned land to develop 455 residential units, commercial and community facility space as part of the Navy Green affordable housing development in Brooklyn (C 090446 HAK) notes: "the cost of providing onsite parking has the potential to either reduce the amount of open space on the site or, due to the high water table on the site, significantly increase the cost of providing the proposed affordable housing."

Despite the existing widespread availability of waivers and overrides that enable affordable developments to avoid their parking requirement, many developments still do choose to provide some amount of parking. This is especially true on large lots, where developments can achieve their full FAR and still provide surface parking, and on lots with significant grade changes, allowing parking to be placed beneath the building but without any need to excavate. This would be expected to continue in the future without the Proposed Action but, for the purposes of this analysis, it is assumed that developments only provide parking if required.

The three-quarters of developments that would have no opportunity to waive or reduce their parking requirement would be expected to be developed in areas where car ownership rates are relatively low, particularly at the income levels characteristic of affordable housing, and near a subway station and other public transportation options. In the future without the Proposed Action, zoning would require parking to be provided for the affordable units. This parking would be costly to provide, especially in dense areas where land prices are at a premium. Structured parking allows developments to provide the maximum amount of floor area for affordable housing units, but industry

sources offer a range as high as $50,000 per structured space to build, and more commonly $20,000 to $40,000 per space[10]. By comparison, the public subsidy available to construct a low-income dwelling unit on private property under HPD's Extremely Low & Low-Income Affordability (ELLA) Program is up to $75,000. While ELLA funding cannot be directly spent on the construction of parking, those looking to build affordable housing must consider the spectrum of costs and subsidies associated with a project.

Surface parking is least expensive in terms of construction costs to develop, but land acquisition costs are high, and there is a significant opportunity cost in terms of the additional housing units that might have been built on the property instead of parking.

In order to support the cost of developing the parking spaces, monthly parking fees in the required off-street spaces would need to exceed what low-income residents would be willing or able to pay. A conservative analysis of construction costs for parking reveal breakeven monthly revenues that exceed what many low income residents can pay per month, including over $300 for a self-park underground parking space[11]. As a result of these high prices, the car-owning residents for whom the spaces were required often find parking on-street, leaving the parking underutilized or occupied by nonresidents.

A small number of affordable housing projects are precluded from development because parking requirements make the development economically infeasible. Other developments provide fewer affordable housing units, or housing that is affordable only to a higher level of incomes than would have been possible, in order to accommodate required parking. This would be expected to continue in the future without the Proposed Action.

Mayor De Blasio's Housing Plan set a goal of increasing the number of affordable housing units constructed, and capital funding and resources at the NYC Department of Housing Preservation and Development has been increased accordingly. Absent the Proposed Action, any increase in funding to promote the development of more affordable housing would be impeded by parking requirements that increase costs and constrain lot area available for new housing.

Absent any changes to policy, this rate of development would be expected to continue over the next 15 years. However, given the changes to 421-a subsidy requirements, and additional funding available to develop affordable housing under the Mayor's Housing Plan, it is expected that the rate of development would increase over the previous 15 years. In the future with the Proposed Action, the cost to build affordable housing would be lower, and a greater number of sites may be developable. As discussed under the With-Action and No-Action scenarios, a substantial percentage of affordable developments occurring today within the proposed Transit Zone have no effective parking requirement once waivers are accounted for. However, sites where parking requirements would constrain development in the No Action scenario would be more easily developed for affordable housing in the future with the Proposed Action.

Although roughly one quarter of affordable housing sites within the Transit Zone are currently (under the No-Action scenario) able to waive out of parking requirements due to lot size or space thresholds or mayoral overrides on city-owned sites, the Proposed Action may enable the development of sites that were previously too difficult or costly to build with the parking requirement, or enable the development of a larger building with more units than could be accommodated with parking under the With-Action scenario.

The New York Housing Conference, an affordable housing policy and advocacy organization, cited cost savings of $1 million for every new 100-unit building in an R7 district that would no longer be required to provide 25 parking spaces in the future with the Proposed Action[12]. While public subsidies cannot be used to directly support the construction costs of parking, developers of affordable housing are typically significantly financially constrained, with very little money available outside of public subsidies to finance the project. Given the relatively inflexible budget of an affordable housing development project, and the minimal return on a parking investment, the savings associated

[10] http://www.reinventingparking.org/2015/06/how-much-does-one-parking-spot-add-to.html

[11] Litman (2012) "VTPI Parking Cost, Pricing, and Revenue Calculator"

[12] http://www.thenyhc.org/Less-Parking-More-Housing%20Handout.pdf

with not having to provide parking are significant. The funds available to a developer of affordable housing could therefore be used to produce more affordable housing units or provide deeper affordability.

Owing to a combination of factors including the proposed changes to parking requirements, more affordable housing is therefore expected to be built throughout the Transit Zone. Absent future discretionary actions, each subject to its own environmental review, all affected sites are already zoned for multifamily residences. Some developments may have more, smaller units because they are not configured to waive the parking requirement; other sites may have more units because they no longer need to build parking, freeing up a portion of the lot for additional units. The effect of the Proposed Action is difficult to predict, but is expected to be widely spread throughout the Transit Zone.

Many future developments would be expected to include the same number of dwelling units as under the No Action scenario; however, they would be built with significant financial savings over the No Action scenario. Some portion of these developments might be expected to fit additional dwelling units on-site as a result of the With Action scenario, able to develop more units using the same amount of public subsidy as under the No Action scenario. Because funding is limited, and because there are significant costs that go into the development of affordable housing in addition to parking, the incremental increase in units at any given site as a result of the Proposed Action is expected to be small. In many cases, the Proposed Action is expected to result in better building design and an increase in space dedicated to common areas, open space, and building amenities, rather than the on-site development of additional units over the no action scenario. However, depending on lot configurations, some sites may be expected to see an increase in the number of affordable units as a result of the Proposed Action. These are modeled in more detail in the prototypes referenced below.

In the future with the Proposed Action, residents of new affordable housing may still choose to own cars, and their parking needs would be expected to be met on-street or in existing off-street facilities, representing no change over the No-Action scenario since affordable housing residents generally cannot afford to pay parking fees that recover the cost of new parking.

The elimination of parking requirements for new affordable housing units within the Transit Zone has the potential to result in the development of additional dwelling units over the No-Action scenario. Future development sites that might have opted to provide surface parking under the no action scenario in order to avoid the substantial costs of structured parking, sacrificing buildable space for additional dwelling units would, under the With-Action scenario, be able to build to their full permitted FAR, resulting in more units on site.

Mayor De Blasio's Housing Plan set a goal of increasing the number of affordable housing units constructed, and capital funding and resources at the NYC Department of Housing Preservation and Development has been increased accordingly. In the future with the Proposed Action, the increase in funding to promote the development of more affordable housing under the Mayor's Housing Plan would be complemented by a the removal of parking requirements, reducing costs and facilitating more efficient construction of affordable housing. As a result, in the future with the Proposed Action, a modest increase in the amount of housing that gets developed throughout the city would be expected over the No-Action scenario, where increased funding would be available but where zoning would continue to hamper the development of affordable units. The amount, type and location of development is not expected to change significantly in the With-Action scenario over the No-Action scenario, but the same amount of units could be built with less public subsidy when off-street parking is better aligned with demand and utilization rates.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototypes 3, 19 and 21 model the development of affordable housing units with a reduced parking requirement in the Transit Zone.

The elimination of parking requirements for new affordable housing units within the Transit Zone has the potential to result in the development of additional dwelling units over the No-Action scenario. Yet, while the Proposed Action would also make it easier to finance affordable housing at a broad citywide level by reducing the costs of development, it is unlikely to have density effects at a local level. However, since it is not possible to conclude where

and to what extent such additional development might occur, the possibility of density-related impacts is analyzed in this Environmental Impact Statement.

Eliminate parking requirements for Affordable Independent Residences for Seniors within the Transit Zone

Proposal's geographic applicability: multifamily within Transit Zone: R3-2, R4, R5, R5B, R5D, R6-R10

In the future without the Proposed Action, parking would continue to be required citywide for new non-profit residences for the elderly at rates pursuant to Section 25-25, Column D. Parking would continue to be applied at a rate that greatly exceeds car ownership among senior households. Based exclusively on an analysis of HUD 202 funded senior housing buildings constructed between 2000 and 2012[13], approximately 100 developments would be expected in the future without the Proposed Action. However, despite a lack of current and anticipated future HUD 202 funding, the Mayor's Housing Plan seeks to increase the number of affordable senior housing units through alternative funding mechanisms in response to growing demand for these units. As a result, a modest increase over the rate of affordable senior housing development developed in the past would be expected in the future without the Proposed Action. Nearly all of the new housing units would be required to provide parking. Only in cases where the development is city-owned, making a mayoral override for the parking requirements possible, would an affordable senior housing development be able to avoid its parking requirement. Senior households are expected to continue to have extremely low rates of car ownership, especially when they are located near transit, and the parking spaces that are provided are expected to be largely underutilized.

A survey of parking facilities associated with non-profit-residences for the elderly, conducted by the senior housing advocacy group LiveOn (formerly CSCS), revealed a parking utilization rate of about 30 percent among affordable senior housing developments in the proposed Transit Zone. This 30 percent utilization rate applies to the total number of parking spaces required, and amounts to an average of approximately 9 residentially-owned cars per development with parking. Approximately one-quarter of all developments that provided required parking had zero residents using the parking spaces on-site.

In the future with the Proposed Action, there would be no parking requirements for independent affordable housing for seniors within the transit zone. Car ownership rates among residents of Affordable Independent Residences for Seniors are expected to remain extremely low, and residents of new senior housing would not have access to heavily subsidized parking lots. The few residents of these developments with cars would be expected to find on-street parking nearby.

The distribution of affordable senior housing developments with parking are widely scattered within the Transit Zone. The Proposed Action is expected to enable some new affordable senior housing developments to fit a modest additional amount of housing on site in the With-Action over the No-Action scenario, on lot area where parking would have been required under the No-Action scenario. Given financial constraints of developing senior housing, the Proposed Action would, in many cases, be expected to facilitate the development of better common areas and more open space for residential recreation. However, the elimination of parking requirements, working in tandem with the removal of density standards and other components of this proposal, is designed to allow more, smaller units, without creating a parking constraint. The effect of the combined components of this proposal is expected to be a modest increase in the number of Affordable Independent Residences for Seniors, as supported by the Mayor's Housing Plan.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototypes 6, 7, 8, 20, 24, 25 model the development of a new affordable independent housing for seniors with a reduced parking requirement in the Transit Zone.

The elimination of parking requirements for new affordable senior housing units within the Transit Zone has the potential to result in the development of additional dwelling units over the No-Action scenario. The Proposed Action may enable the development of sites that were previously too difficult or costly to build with the parking

[13] Furman Center SHIP data, HUD 202 funded developments constructed between 2000 and 2012.

requirement, or enable the development of a larger building with more units that could be accommodated with parking under the With-Action scenario.

The Proposed Action is expected to enable some new affordable senior housing developments to fit a modest additional amount of housing on site in the With-Action over the No-Action scenario, on lot area where parking would have previously been located. While the Proposed Action would also make it easier to finance senior housing at a broad citywide level by reducing the costs of development, it is unlikely to have density effects at a local level. However, since it is not possible to conclude where and to what extent such additional development might occur, the possibility of density-related impacts is analyzed in this Environmental Impact Statement. There is no anticipated potential for a parking shortfall as a result of the Proposed Action given the very low car ownership patterns among current residents of affordable senior housing.

Eliminate existing and previously required parking for non-profit residences for the elderly or dwelling units for the elderly within the Transit Zone

Proposal's geographic applicability: multifamily within Transit Zone: R3-2, R4, R5, R5B, R5D, R6-R10

In the future without the Proposed Action, parking would continue to be required citywide for existing non-profit residences for the elderly at rates pursuant to Section 25-25, Column D. The roughly 65 parking lots within the Transit Zone that are associated with HUD 202 senior housing developments would continue to exist with capacities that greatly exceed demand among residents.

In the future with the Proposed Action, a small number of developments containing Independent Affordable Housing for Seniors would be expected to construct infill development on their existing parking lots. HPD-financed projects typically require that there be at least 50 dwelling units associated with the development. LiveOn NY, a senior housing and policy advocacy group operating in NYC, produced a report in May 2015[14] that surveyed 277 HUD Section 202 buildings across the city to determine to what extent they have underutilized surface parking lots that could be utilized differently to make additional affordable senior housing. Their survey concluded that 39 HUD Section 202 accessory parking lots, privately owned by non-profit senior housing providers, could feasibly be redeveloped to expand the number of affordable senior housing developments on-site, based solely on lot characteristics and current parking utilization and absent any funding or regulatory constraints.

In the future with the Proposed Action, roughly 2,000 additional units of affordable senior housing could be developed on these 39 sites in all 5 boroughs. Even with the current administration's commitment to develop more senior housing, funding and the lack of available development sites would remain as significant obstacles to the development of additional housing units in the future with the Proposed Action. Moreover, even with the elimination of parking requirements, the redevelopment of existing HUD 202 parking lots requires HUD and HPD approval. As conditions of the original regulatory agreement, mortgage provisions, and other restrictions, the property owners are required to seek HUD and HPD approval to modify a partial change in use on the site, in order to expand into an existing parking lot. Therefore, although some expansion and the creation of additional units is expected in the future with the Proposed Action, it is difficult to predict how many of the existing sites would be expected to construct additional housing in the foreseeable future.

In some cases, however, it is expected that affordable senior housing developments might expand to provide additional dwelling units. A development at 138th Street in the Bronx provides a direct example of what would be possible as of right in the future with the Proposed Action. The Tres Puentes project (15 DCP119X) sought and received a zoning text amendment to modify ZR Section 74-745 to permit a reduction or waiver for parking requirements for non-profit residences for the elderly. An existing parking lot providing accessory parking spaces to the existing 145-unit HUD-assisted senior housing development was underutilized, and the applicant proposed an enlargement to the development, facilitating 178 additional dwelling units for low-income seniors. As part of the CEQR process, the applicant had to complete and environmental impact statement analyzing the effect of the action. The EIS concluded that, based on existing parking demand and proximity to public transportation, the Tres Puentes project would not significantly increase parking demand. A negative declaration was issued for this application on

[14] http://www.liveon-ny.org/files/LiveOn-NY_Paving_The_Way_for_New_Senior_Housing.pdf

April 20, 2015, stating no significant environmental effect and enabling the project to proceed. In the future with the Proposed Action, projects to develop affordable senior housing near public transportation and where car ownership rates are low, like the Tres Puentes project, would be allowed to proceed as-of-right. The LiveOn study described above identified 39 sites across the Transit Zone where such redevelopment may be possible, but there is no way to determine which sites would be expected to proceed with redevelopment. However, since the possibility of density and building form effects cannot be ruled out as a result of the Proposed Action, the effects of this component of the Proposed Action are analyzed as part of this EIS.

Prototypical Analysis

Because it is not possible to determine which, if any of the sites that LiveOn identified may actually be redeveloped given financial, regulatory, and other constraints, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototypes 11 and 22 model the development of a new building or enlargement over previously required parking for Affordable Independent Residences for Seniors within the Transit Zone.

The proposal would allow for the redevelopment of existing senior parking lots, which may result in additional dwelling units and a modified building form. The number and location of existing senior housing parking lots with parking lots large enough to facilitate additional development is limited within the proposed Transit Zone, but the possibility of density- and bulk-related impacts cannot be ruled out and are analyzed in this Environmental Impact Statement.

Modify parking requirements for Affordable Independent Residences for Seniors to 10 percent in multifamily zoning districts outside the Transit Zone

Proposal's geographic applicability: R3-2, R4, R5, R5B, R5D, R6-R10

In the future without the Proposed Action, parking would continue to be required citywide for new non-profit residences for the elderly at rates pursuant to Section 25-25, Column D. Parking would continue to be applied at a rate that greatly exceeds car ownership among senior households. As previously discussed, based on historical development trends, very few of these housing types are expected to be built in the future without the Proposed Action.

In the future with the Proposed Action, parking would be provided at a rate of 10 percent in all multifamily zoning districts outside of the Transit Zone. Based on existing car ownership rates among developments in these geographies, residential demand for parking would continue to be met by off-street parking. The zoned densities in these districts are typically achievable while leaving open space for parking lots, and particularly in R3-2 and R4 districts, additional open parking may be accommodated if a developer anticipates demand for such additional parking. This change works in tandem with the revised building envelope to encourage an increased number of affordable senior housing developments in lower density districts, but the amount, type, and location of development is difficult to predict and is expected to be widely dispersed across all applicable zoning districts outside the Transit Zone across the city.

While the Proposed Action would also make it easier to finance senior housing at a broad citywide level by reducing the costs of development, it is unlikely to have density effects at a local level. However, since it is not possible to conclude where and to what extent such additional development might occur, the possibility of density-related impacts is analyzed in this Environmental Impact Statement.

Prototypical Analysis

Because it is not possible to identify specific development sites, a prototypical site has been chosen to illustrate the effects of the Proposed Action. Prototypes 24, 26 and 27 model the development of a new building or enlargement utilizing the reduction in parking requirements for Affordable Independent Residences for Seniors outside of the Transit Zone.

The Proposed Action would result in a reduction of required parking for senior housing in low- and medium density multifamily zoning districts far from transit, to 10 percent. The reduction would still require sufficient parking to accommodate residential demand, but would enable some additional units to be built over the No-Action scenario, and with a better site design, with the same amount of public subsidy.

While the Proposed Action would also make it easier to finance senior housing at a broad citywide level by reducing the costs of development, it is unlikely to have density effects at a local level. However, since it is not possible to conclude where and to what extent such additional development might occur, the possibility of density-related impacts is analyzed in this Environmental Impact Statement.

H. PROTOTYPICAL ANALYSIS: POTENTIAL DEVELOPMENT AND LIKELY EFFECTS OF THE PROPOSED ACTION

Some assumptions have been made for each prototype, to conservatively analyze the reasonable worst case development that might occur as a result of the Proposed Action.

Gross vs. Permitted Floor Area

All developments have a Floor Area Ratio (FAR) that determines the permitted development rights, or square footage that can be built. In addition to the permitted development rights per the FAR, there is some amount of additional square footage included in a development that is exempt from FAR calculations. This may include square footage allocated towards mechanical spaces, refuse storage, laundry rooms, and indoor recreation space for Quality Housing developments and extra wall thickness for energy efficient buildings. As a result of these floor area exemptions, the gross floor area is higher than the permitted development rights.

The Quality Housing Program is a mandatory housing program for almost all medium and high density contextual residence districts. The Program require certain amenities for residents, like laundry rooms and recreational space that could be exempted from zoning floor area calculation. As a result, Quality Housing buildings typically have larger floor area deductions than what are typically allowed for non-Quality Housing buildings such as residential buildings built under height factor or tower regulations or community facility buildings. Non-Quality Housing buildings have no requirements for residential amenities, and there are limited floor area such as mechanical spaces could be deducted from their gross floor area. For this EIS, it is assumed that 10 percent of Quality Housing building floor area and 5 percent of a non-Quality Housing building floor area would be deducted from gross floor area.

Unit Sizes

Once gross floor area is calculated for each prototype, assumptions are made with regard to space allocated towards private dwelling units and public or otherwise nonresidential space. In residential buildings with market rate and/or affordable units, the number of dwelling units is calculated by dividing gross square footage by 900. The 900 square feet assumption is based on contemporary development practices and includes square footage for each dwelling unit, plus 20 percent allocated towards non-dwelling area such as a lobby, hallways and recreation spaces, within the residential building. In the city's highest density districts, R9 and R10 that are widely mapped in the area south of 110th Street in Manhattan, Downtown Brooklyn and Long Island City, gross square footage is divided by 850, to account for unit sizes that are typically smaller, on average, than in other districts.

Affordable Independent Residences for Seniors typically have smaller residential units, with more square footage dedicated for common areas within. For these developments, gross square footage is divided by 650, which captures each individual unit plus 30 percent common area and other nonresidential space within the residential building. Nonresidential space may include (but is not limited to) community rooms, laundry rooms, and shared dining spaces.

Long-term care facilities are typically measured by bed, rather than dwelling unit, with significant space allocated towards common areas. For these developments, gross square footage is divided by 550, which captures individual bed areas plus 60 percent common areas. Non-bed square footage may be in the form of lobbies, treatment areas, cafeterias, and hallways.

Building Envelopes

The Proposed Action consists of several dozen discrete components, which are expected to be incorporated into future developments in combinations that facilitate more efficient and less costly buildings. Most developments would not be expected to utilize all components of the proposal in the future with the Proposed Action. The components that are incorporated into each prototype have been chosen based on lot conditions such as size and depth, existing zoning and building envelope conditions, and proposed building type.

The maximum permitted building envelope is depicted in the prototypes as a hashed line and is typically larger than the building depicted in the With-Action scenario image. One major component of this proposal is the adjustment of height controls in moderate- and high-density districts, and for inclusionary and senior housing developments. The adjustment of the building envelope is intended to allow for better articulation and more flexible building design

and layouts on a lot. Under existing conditions, the building envelope is so tight that it precludes any flexibility in building design and often results in undesirable interior conditions and difficulties complying with other regulatory requirements such as the Americans with Disabilities Act and fire and energy efficiency codes. In many cases, architects are forced to design buildings that are flush against the street wall, with no articulation, and with low floor-to-ceiling heights to accommodate the full permitted floor area within the envelope. Among other things, the proposal would allow some room within the envelope to design a building that interacts better with the street and has desirable quality living spaces within.

As a result of the proposed modified building envelope, developments under the With-Action scenario would have more flexibility in accommodating their full permitted floor area. As a result of this increased flexibility, the entirety of the permitted envelope would not be filled under the With-Action scenario, as opposed to the No-Action scenario where housing providers have no choice but to try to fit all of their floor area into a tight building envelope. The modest reduction in required setbacks and rear yard requirements will, in many cases, result in buildings that accommodate their full permitted floor area before reaching their maximum permitted height; FAR would limit the amount of development that can occur on a lot, rather than the building envelope.

Lot Sizes and Dimensions

For each prototype, a typical lot size and configuration was assumed, based on the prevalence of conditions across the city. A "standard" 100' by 100' lot represents the most easily developable site, thus making it an appropriate model to measure the incremental impacts of the Proposed Action. Except where the Proposed Action is specifically designed to affect development on unusual lots, such as those that are narrow, shallow, or adjacent to infrastructure or a lower-density district, R7A was determined to represent the reasonable worst case for the effects of the Proposed Action.

Zoning Districts

The prototypical zoning district chosen to represent many components of the Proposed Action is R7A. This district is widely mapped across the city and represents one of the most affected districts, both in terms of geographic applicability, and height increases relative to its current building envelope. Similar considerations were made for prototypes demonstrating the Proposed Action in higher- or lower-density areas.

Parking Requirements

Under No-Action Scenario, off-street parking requirements of existing zoning regulations are applied. Off-street parking spaces are required for most housing developments, except in very high density districts such as the area south of 110th street in Manhattan, Downtown Brooklyn and Long Island City. For contextual Quality Housing buildings in medium and high density districts, off-street parking is required at a rate of 40 to 50 percent of total number of dwelling units. In addition to these basic requirements, small housing developments can utilized either reduced or no parking requirements in these districts. For example, in R7A medium density residence districts and its commercial equivalent districts, parking requirements could be reduced from 50 percent of total number of dwelling units to 30 percent if a development occupies a lot less than 10,000 square feet in size. Off-street parking requirements could be completely waived if the resulting overall off-street parking requirement is less than 15 spaces. In R8A high density districts, parking requirements could be completely waived if a development occupies a lot of less than 10,000 square feet. There are also significantly reduced off-street parking requirements for a variety of affordable housing types including housing for low-income residents, government-subsidized housing and affordable senior housing to facilitate the construction of these necessary and often costly developments. Generally, under the existing framework, parking is required for between 40% and 70% of market rate units in the city's medium and higher density zoning districts (R6-R10), 12% and 35% of affordable housing units, and 10% and 22.5% of affordable senior housing units.

Under the With-Action Scenario, off-street parking requirements for market-rate housing would remain the same as the existing requirements, at 40 to 70 percent, and the same reduction and waiver provisions with No-Action Scenario would be applied. Off-street parking requirements for affordable and senior housing are waived within the Transit Zone, and required outside the Transit Zone as described in this ~~DEIS~~ FEIS. The following Prototypes 1 through 27 are assumed to be located within the Transit Zone unless otherwise noted.

Prototype 1: R7A District, 100’ x 100’ interior lot on narrow street

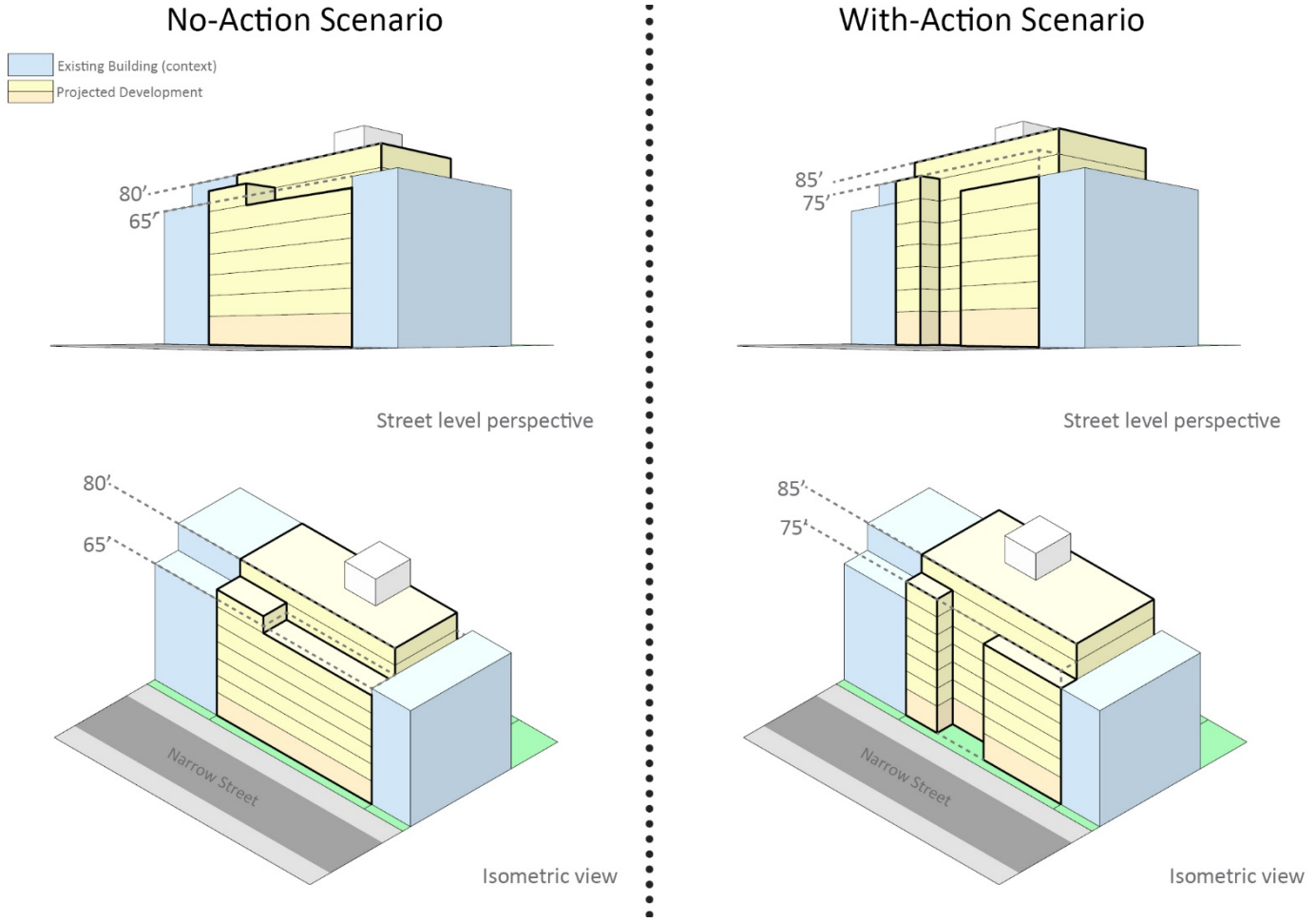
This prototype, as shown in the illustrative example on the next page, utilizes a generic 100’ x 100’ interior lot on a narrow street in an R7A district. These assumptions were made because they represent the typical lot conditions found in medium density contextual districts throughout the city. The prototype affords the opportunity to understand the effects of the following portions of the Proposed Action on development:

- Adjust height controls in moderate- and high-density districts
- Create more-efficient building setback rules
- Provide greater clarity and design opportunities in street wall regulations
- Match street wall line-up provision requirements to intent
- Encourage elevated residential ground floors

In the No-Action scenario, the 40,000 sq. ft. of zoning floor area permitted by the zoning district is accommodated in the existing building envelope, but doing so requires sub-optimal floor to floor heights, particularly on the ground floor. The building façade is flat with no articulation in order to allow for the maximum permitted amount of floor area to fit within the envelope. The building accommodates 49 market-rate units, with a 30% parking requirement (for zoning lots less than 10,000 sq. ft.) resulting in 15 spaces, which are allowed to be waived in an R7A district. The building is 60’ deep and has a base height of 65’ and a total height of 80’, or 8 stories.

In the With-Action scenario, the floor area permitted by the zoning district is also accommodated, but the modified building envelope allows the use of contemporary best practices for residential uses, including more desirable floor-to-floor heights for residential units, while also permitting and encouraging a modest ground floor setback and a range of building articulation so the street wall can provide some variety. The building is 60’ deep and has a maximum base height of 75’ and a total height of 85’, or 8 stories. The building continues to accommodate 49 market-rate units, with a 30% parking requirement resulting in 15 spaces, which are allowed to be waived in an R7A district.

Incremental changes as a result of the with-action scenario include an additional 5’ height and a modified building footprint on the lot. No additional number of stories, gross square footage or FAR is accommodated on the lot, but the changes to building design facilitated by the Proposed Action enable the utilization of more efficient construction techniques while resulting in a better pedestrian experience at the sidewalk.



	No Action	With Action
Lot Area (square feet)	10,000 sq. ft.	10,000 sq. ft.
Permitted FAR	4.0	4.0
Permitted Development Rights (square feet)	40,000 sq. ft.	40,000 sq. ft.
Ground Floor / Upper Story Height	13' / 9' -6"	15' / 10'
Building Depth	60'	60'
Number of Stories/Overall Height	8/80'	8/85'
Floor Area that can be accommodated (square feet)	40,000 sq. ft.	40,000 sq. ft.
Remaining Floor Area (square feet)	0 sq. ft.	0 sq. ft.
Difference in Buildable Floor Area (percent increase over No Action)		0%
Gross Floor Area (square feet)	44,000 sq. ft.	44,000 sq. ft.
Total number of units (market-rate/affordable)	49 (49/0) units	49 (49/0) units
Number of parking required (market-rate/affordable)	0 (0/0) spaces	0 (0/0) spaces

Prototype 2: R7A District, Inclusionary Housing, 100’ x 100’ interior lot on narrow street

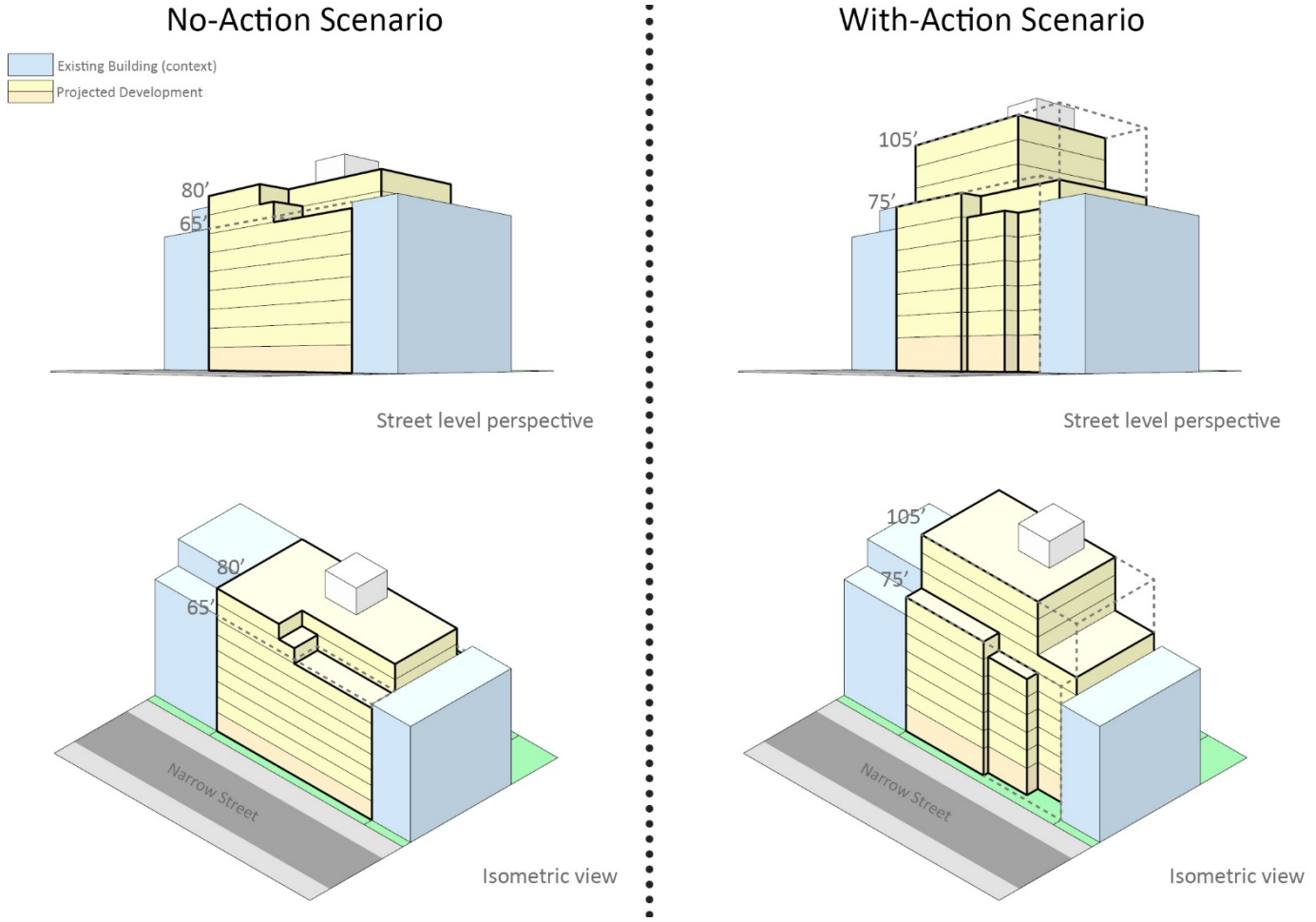
This prototype, as shown in the illustrative example on the next page, utilizes a generic 100’ x 100’ interior lot on a narrow street in an R7A district where the Inclusionary Housing program exists. These assumptions were made because they represent the typical lot conditions found in contextual districts throughout the city and development in this district utilizing the Inclusionary Housing program has some of the greatest difficulty constructing the full permitted floor area which would result in sub-standard dwelling units and a building lacking traditional design features such as a front yard, raised ground floor and court yards. The prototypes also assumes that the prototypical lot would be located in the proposed Transit Zone. The prototype affords the opportunity to understand the effects of the following provisions of the Proposed Action on development:

- Create more-efficient building setback rules
- Adjust height controls for Inclusionary Housing
- Provide greater clarity and design opportunities in street wall regulations
- Match street wall line-up provision requirements to intent
- Encourage elevated residential ground floors

In the No-Action scenario, the higher floor area permitted by the zoning district under the Inclusionary Housing program could be fully accommodated in the existing building envelope, but with the use of numerous sub-optimal floor-to-floor heights and more-costly building construction techniques. In addition, the 45 market-rate units and 11 affordable units would generate 14 and 2 parking spaces, respectively. The building has a depth of 60’ and reaches a maximum height of 80’, or 9 stories.

In the With-Action scenario, the higher floor area permitted under the Inclusionary Housing program can be fully accommodated in a development that utilizes contemporary best practices for residential buildings, including floor-to-floor heights and block-and-plank construction, while also permitting a range of building articulation. Assuming an average unit size of 900 square feet, the development would be permitted to utilize the modified requirements for parking and therefore provide 14 parking spaces for the 45 market-rate units and 0 parking spaces for the 11 affordable housing units. However, in an R7A district parking may be waived as of right for 15 or fewer spaces, so this development would not be expected to provide any parking in the With-Action scenario. The building depth is reduced to 60 feet. The building could reach a maximum height of 105 feet, representing an incremental increase of 25 feet over the No Action Scenario.

Incremental changes as a result of the with-action scenario include an additional 25’ height, 16 fewer parking spaces, and a modified building footprint on the lot.



	No Action	With Action
Lot Area (square feet)	**10,000 sq. ft.**	**10,000 sq. ft.**
Permitted FAR	**4.6**	**4.6**
Permitted Development Rights (square feet)	**46,000 sq. ft.**	**46,000 sq. ft.**
Ground Floor / Upper Story Height	**10' -6" / 8' -8"**	**15' / 10'**
Building Depth	**60'**	**60'**
Number of Stories/Overall Height	**9/80'**	**10/105'**
Floor Area that can be accommodated (square feet)	**46,000 sq. ft.**	**46,000 sq. ft.**
Remaining Floor Area (square feet)	**0 sq. ft.**	**0 sq. ft.**
Difference in Buildable Floor Area (percent increase over No Action)		**0%**
Gross Floor Area (square feet)	**50,600 sq. ft.**	**50,600 sq. ft.**
Total number of units (market-rate/affordable)	**56 (45/11) units**	**56 (45/11) units**
Number of parking required (market-rate/affordable)	**16 (14/2) spaces**	**0 (0/0) spaces**

Prototype 3: R7A District adjoining an R4A District, Inclusionary Housing, 100' x 100' corner lot on wide and narrow streets

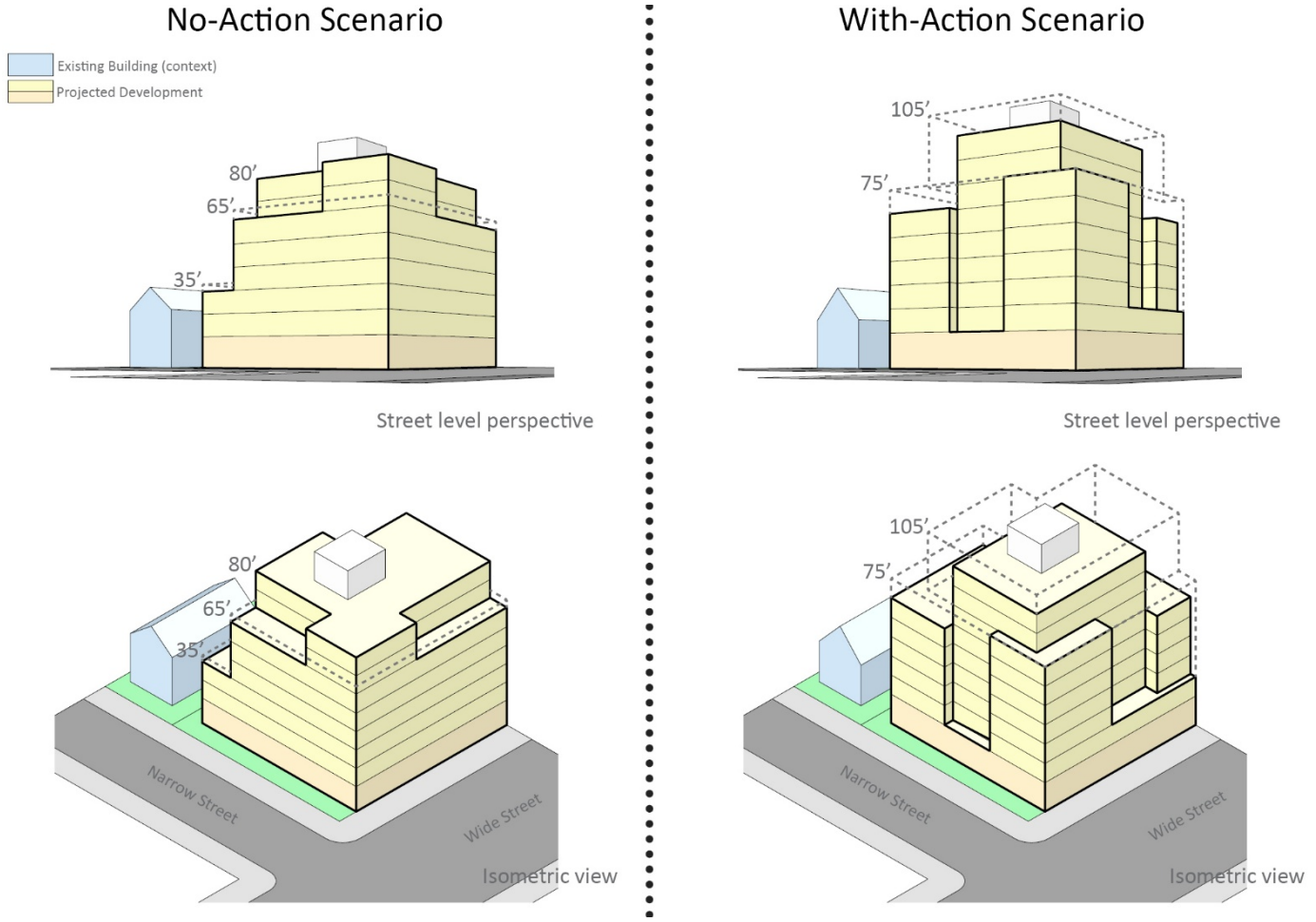
The prototype utilizes a generic 100' x 100' corner lot on a wide street in an R7A district adjoining a lower-density R4A district. These assumptions were chosen because they represent two zoning districts that are more likely to abut one another, resulting in utilization of the current and proposed transition rule. The prototype affords the opportunity to understand the effects of the following portions of the proposal on development:

- Adjust height controls for Inclusionary Housing
- Create more-efficient building setback rules
- Remove unnecessary corner lot coverage restrictions
- Provide a more balanced building transition rule
- Provide greater clarity and design opportunities in street wall regulations
- Match street wall line-up provision requirements to intent
- Provide more-useable court regulations
- Eliminate parking requirements for new low-income or Inclusionary Housing units within the Transit Zone

In the No-Action scenario, the development utilizes the existing building envelope and additionally adheres to the current transition rules that require buildings be significantly lowered and set away from specific lower density districts. The development is able to fit its permitted floor area in the existing building envelope, but doing so requires the building to pack as many dwelling units as possible into the existing envelope, by providing sub-optimal floor to floor heights, particularly on the street level. The building is 60' deep and has a maximum height of 80', or 8 stories, with the portion of the building abutting the R4A district limited to 35', and built to 30' in this model to conform with the floor to ceiling heights found throughout the rest of the building.

In the With-Action scenario, the development utilizes the modified building envelope regulations and additionally adheres to the modified transition rules that permit buildings to develop up to their permitted base height adjacent to specific lower density districts. With the expanded envelope, the development is able to fit its permitted floor area while utilizing best practices for residential buildings and a range of building articulation. The building is 60' deep and fits its allowable floor area with a height of 95', or 9 stories, although a maximum height of 105', or 10 stories, is permitted. The portion of the building adjacent to the R4A district rises to 65', more reflective of the R7A height allowance, while the existing 8 feet unobstructed open area requirement between the building and adjacent lot would remain. The Proposed Action results in a building that is 25', or one story, taller, with higher quality ground floor lobby space. The building could accommodate approximately 56 dwelling units, 45 of which would be market-rate (with 14 parking spaces) and 11 of which would be affordable and therefore having no parking requirement. Because the number of parking spaces generated falls below the R7A district's 15 space threshold, the building is able to waive out of its parking requirement.

Incremental changes as a result of the with-action scenario include an additional 35' height adjacent to the R4A district and 15' height outside of the transition zone, a reduction of 16 parking spaces, and a modified building footprint on the lot. Other existing transition rules, such as street wall alignment and 8-foot side yard along district boundaries, would be retained. No additional gross square footage or FAR is accommodated on the lot, but the changes to building design facilitated by the Proposed Action enable the utilization of more efficient construction techniques while resulting in a better pedestrian experience at the sidewalk.



	No Action	With Action
Lot Area (square feet)	**10,000 sq. ft.**	**10,000 sq. ft.**
Permitted FAR	**4.6**	**4.6**
Permitted Development Rights (square feet)	**46,000 sq. ft.**	**46,000 sq. ft.**
Ground Floor / Upper Story Height	**13' / 9' -6"**	**15' / 10'**
Building Depth	**60'**	**60'**
Number of Stories/Overall Height	**8/80'**	**9 (10 permitted)/ 95' (105' permitted)**
Floor Area that can be accommodated (square feet)	**46,000 sq. ft.**	**46,000 sq. ft.**
Remaining Floor Area (square feet)	**0 sq. ft.**	**0 sq. ft.**
Difference in Buildable Floor Area (percent increase over No Action)		**0%**
Gross Floor Area (square feet)	**50,600 sq. ft.**	**50,600 sq. ft.**
Total number of units (market-rate/affordable)	**56 (45/11) units**	**56 (45/11) units**
Number of parking required (market-rate/affordable)	**16 (14/2) spaces**	**0 (0/0) spaces**

Prototype 4: R7A District, 100' x 85' shallow interior lot on narrow street

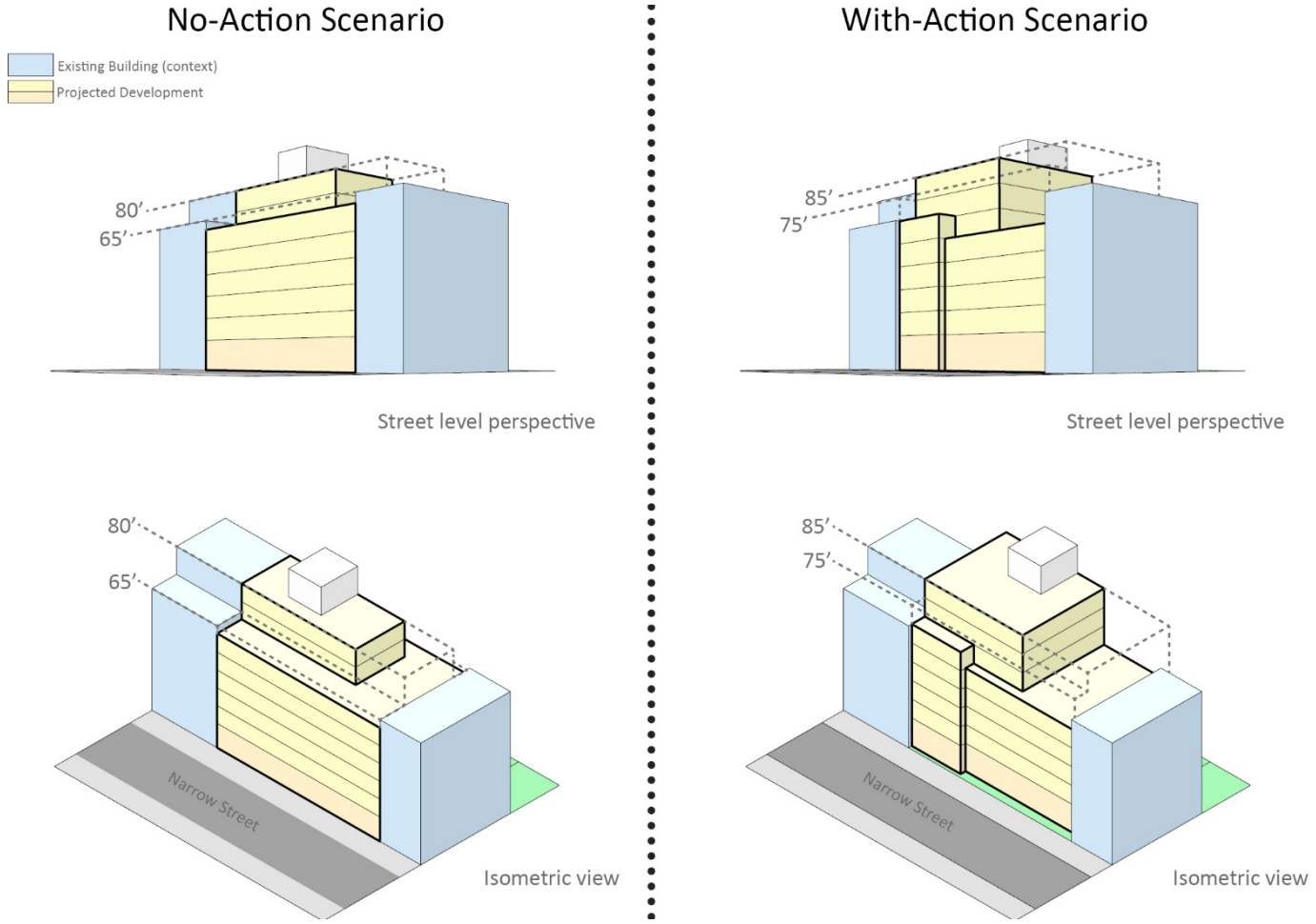
The prototype utilizes a shallow 100' wide x 85' interior lot on a wide street. These assumptions were chosen because they represent a reasonable worst case for residential lot depth in the city. The prototype affords the opportunity to understand the effects of the following portions of the proposal on development:

- Adjust height controls in moderate- and high-density districts
- Create more-efficient building setback rules
- Provide improved yard and coverage regulations for shallow lots

In the No-Action scenario, the development is required to provide a full 30 foot rear yard regardless of the shallow depth of the lot since the existing relief of rear yard requirement is available only to a lot shallower than 75 feet. In order to maximize the buildable portion of the lot, the building reaches only 55' depth and is located directly on the property line. The development is able to fit all its permitted floor area using the existing building envelope controls, however it is only accomplished with sub-optimal floor-to-floor heights, as well as floor plate depths, and there is little to no opportunity for building articulation. The building accommodates 42 market-rate units, with a 30% parking requirement resulting in 13 spaces. However, these parking spaces are allowed to be waived in an R7A district.

In the With-Action scenario, the development is permitted to reduce the depth of the required rear yard to 25 feet. This allows for a deeper floor plate depth more in line with typical residential construction. The development is able to fit all its permitted floor area using the modified building envelope controls. The development is able to utilize best practices for residential buildings for floor to floor heights and is also able to set the building off the property line and provide a variety of building articulation options. The building accommodates 42 market-rate units, with a 30% parking requirement resulting in 13 spaces, which are allowed to be waived in an R7A district.

Incremental changes as a result of the with-action scenario include an additional 5' of allowable height, and a modified building footprint on the lot. There is no change to the overall square footage or amount of allowable FAR on the site. Instead, the modified bulk envelope allows for more flexibility in building design Portions of the building footprint 3 feet deeper in the With-Action scenario over the No-Action scenario, to enable articulation and better design, but there is no incremental change to the development's square footage or number of units.



	No Action	With Action
Lot Area (square feet)	**8,500 sq. ft.**	**8,500 sq. ft.**
Permitted FAR	**4.0**	**4.0**
Permitted Development Rights (square feet)	**34,000 sq. ft.**	**34,000 sq. ft.**
Ground Floor / Upper Story Height	**13' / 9' -6"**	**15' / 10'**
Building Depth	**55'**	**55-58'**
Rear Yard Depth	**30'**	**25'**
Number of Stories/Overall Height	**8/80'**	**8/85'**
Floor Area that can be accommodated (square feet)	**34,000 sq. ft.**	**34,000 sq. ft.**
Remaining Floor Area (square feet)	**0 sq. ft.**	**0 sq. ft.**
Difference in Buildable Floor Area (percent increase over No Action)		**0%**
Gross Floor Area (square feet)	**37,400 sq. ft.**	**37,400 sq. ft.**
Total number of units (market-rate/affordable)	**42 (42/0) units**	**42 (42/0) units**
Number of parking required (market-rate/affordable)	**0 (0/0) spaces**	**0 (0/0) spaces**

Prototype 5: R7A District, 100' x 170' shallow through lot on wide and narrow streets

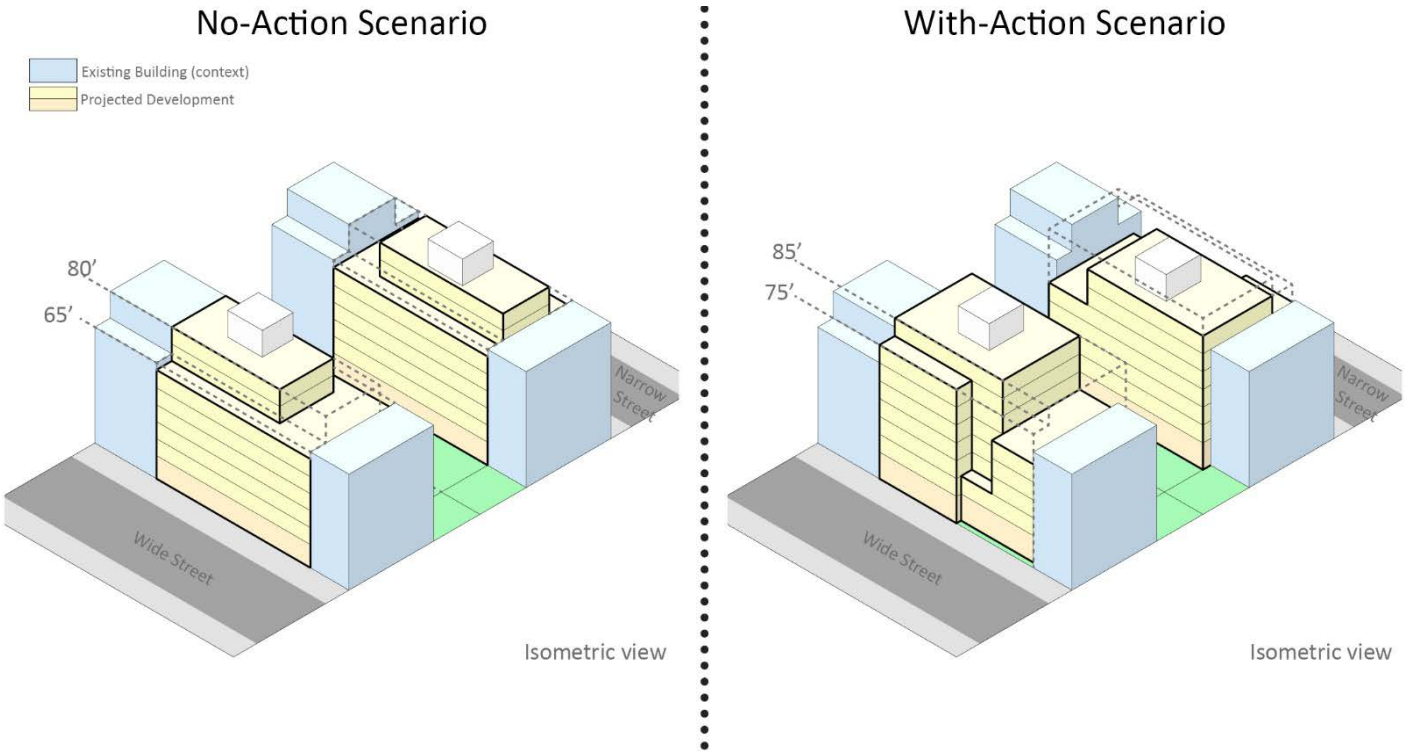
The prototype utilizes a 100' wide x 170' deep shallow through lot. The prototype affords the opportunity to understand the effects of the following portions of the proposal on development:

- Adjust height controls in moderate- and high-density districts
- Create more-efficient building setback rules
- Provide improved yard and coverage regulations for shallow lots

In the No-Action scenario, the development is required to provide a full 60 foot rear yard regardless of the depth of the lot. When rear yard requirements were designed, through lots were assumed to have a depth of 200', and a 60' rear yard was rationale given those dimensions. Under the No-Action scenario on a through lot with a depth of only 170', in order to maximize the buildable portions of the lot, the two buildings are located directly on the two property lines. The overall development is able to fit all its permitted floor area within the permitted 80' height using the existing building envelope controls, however it is only accomplished with sub-optimal floor-to-floor heights, as well as floor plate depths, and there is little to no opportunity for building articulation. The building accommodates 83 market-rate units, with a 50% parking requirement resulting in 42 spaces.

In the With-Action scenario, the development is permitted to reduce the depth of the required rear yard to 50 feet. This allows for a deeper floor plate depth more in line with typical residential construction. The development is able to fit all its permitted floor area using the modified building envelope controls, by achieving a height of 85'. The development is able to utilize best practices for residential buildings for floor to floor heights and is also able to set the building off the property line and provide a variety of building articulation options. The building accommodates 83 market-rate units, with a 50% parking requirement resulting in 42 spaces.

Incremental changes as a result of the with-action scenario include an additional 5' of allowable height, and a modified building footprint on the lot, utilizing the change in setback requirements and also the change in coverage regulations for shallow lots. No additional gross square footage or FAR is accommodated on the lot, but the changes to building design facilitated by the Proposed Action enable the utilization of more efficient construction techniques while resulting in a better pedestrian experience at the sidewalk.



	No Action	With Action
Lot Area (square feet)	17,000 sq. ft.	17,000 sq. ft.
Permitted FAR	4.0	4.0
Permitted Development Rights (square feet)	68,000 sq. ft.	68,000 sq. ft.
Ground Floor / Upper Story Height	13' / 9' -6"	15' / 10'
Building Depth	55'	55-58'
Rear Yard Depth	60'	50'
Number of Stories/Overall Height	8/80'	7-8/75'-85'
Floor Area that can be accommodated (square feet)	68,000 sq. ft.	68,000 sq. ft.
Remaining Floor Area (square feet)	0 sq. ft.	0 sq. ft.
Difference in Buildable Floor Area (percent increase over No Action)		0%
Gross Floor Area (square feet)	74,800 sq. ft.	74,800 sq. ft.
Total number of units (market-rate/affordable)	83 (83/0) units	83 (83/0) units
Number of parking required (market-rate/affordable)	42 (42/0) spaces	42 (42/0) spaces

Prototype 6: R7D District, Affordable Independent Residences for Seniors, 100' x 100' interior lot on narrow street

The prototype utilizes a generic 100' x 100' interior lot on a narrow street in the Transit Zone. These assumptions were chosen because the R7D district experiences one of the highest percentage increases in permitted floor area for this use. The prototype affords the opportunity to understand the effects of the following portions of the proposal on development:

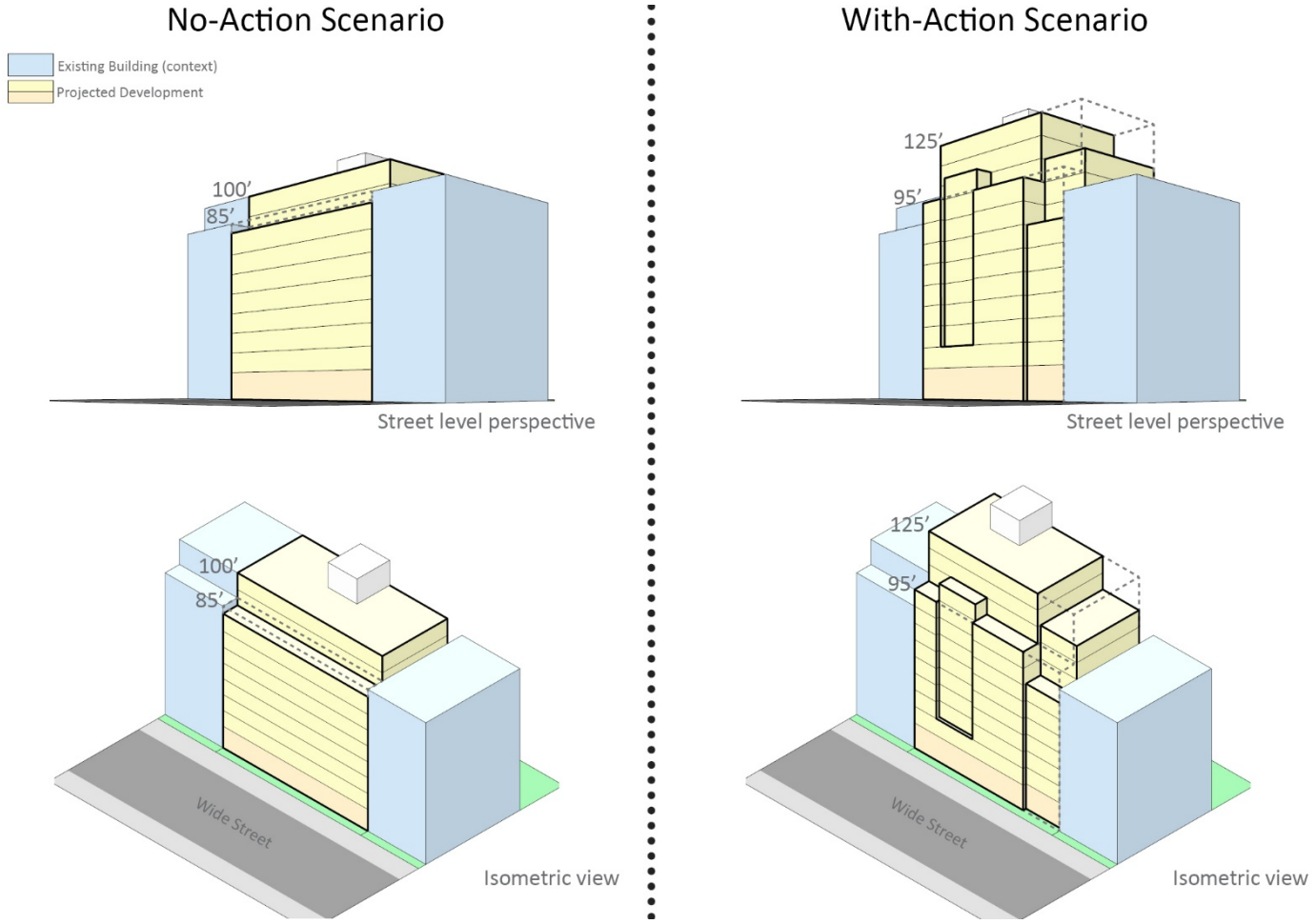
- Update floor area ratio maximum for Affordable Independent Residences for Seniors
- Remove density limits for affordable senior housing
- Create more-efficient building setback rules
- Adjust Height Controls for Affordable Independent Residences for Seniors and Long-Term Care Facilities
- Permit residential accessory uses on ground floors in rear yards
- Eliminate parking requirements for Affordable Independent Residences for Seniors within the Transit Zone

In the No-Action scenario, the affordable senior housing development is able to fit the existing floor area permitted for the use in this zoning district utilizing the existing Quality Housing building envelope controls. The number of units in the affordable senior housing development is controlled by the existing dwelling unit factor and translates into a maximum of 71 units permitted. Since no waiver is available for affordable senior housing, the development would be required to provide 9 parking spaces for the 71 affordable senior units.

In the With-Action scenario, the affordable senior housing development is permitted a higher floor area ratio for the use, in line with the existing Inclusionary Housing Program's higher FAR. In this scenario, this represents a floor area increase of 11.8 percent. The development fully constructs this permitted floor area this by utilizing the enhanced envelope controls afforded to buildings taking part in the Inclusionary Housing Program or providing affordable senior housing or Long-Term Care facilities, and is able to provide additional accessory residential space and open space in the backyard instead of required parking. The development is able to utilize best practices for residential buildings for floor-to-floor heights and is also able to set the building off the property line and provide a variety of building articulation options.

The number of units in the senior housing development is not restricted by a specific dwelling unit factor for the use but, based on comparable projects recently proposed or developed in the city which have an average unit size of approximately 650 square feet, the development would have approximately 95 units. The development would be permitted to utilize the modified requirements and therefore provide 0 parking spaces for the affordable senior units.

Incremental changes as a result of the with-action scenario include an additional 25' of allowable height, 24 additional dwelling units, a reduction of 9 parking spaces and a modified building footprint on the lot, and a modified building envelope with additional ground floor residential accessory space. There is an overall incremental increase of 8,995 gsf. The development is able to utilize the change in setback requirements and provide accessory residential uses in the rear yard in place of the parking that would have been required in the No Action scenario.



	No Action	With Action
Lot Area (square feet)	**10,000 sq. ft.**	**10,000 sq. ft.**
Permitted FAR	**5.01**	**5.6**
Permitted Development Rights (square feet)	**50,100 sq. ft.**	**56,000 sq. ft.**
Ground Floor / Upper Story Height	**13' / 9' -6"**	**15' / 10'**
Building Depth	**60'**	**55'**
Number of Stories/Overall Height	**10/100'**	**12/125'**
Floor Area that can be accommodated (square feet)	**50,100 sq. ft.**	**56,000 sq. ft.**
Remaining Floor Area (square feet)	**0 sq. ft.**	**0 sq. ft.**
Difference in Buildable Floor Area (percent increase over No Action)		**11.8%**
Gross Floor Area (square feet)	**52,605 sq. ft.**	**61,600 sq. ft.**
Total number of units (market-rate/affordable)	**71 (0/71) units**	**95 (0/95) units**
Number of parking required (market-rate/affordable)	**9**	**0**

Prototype 7: R7X District, Affordable Independent Residences for Seniors, 100' x 100' interior lot on narrow street

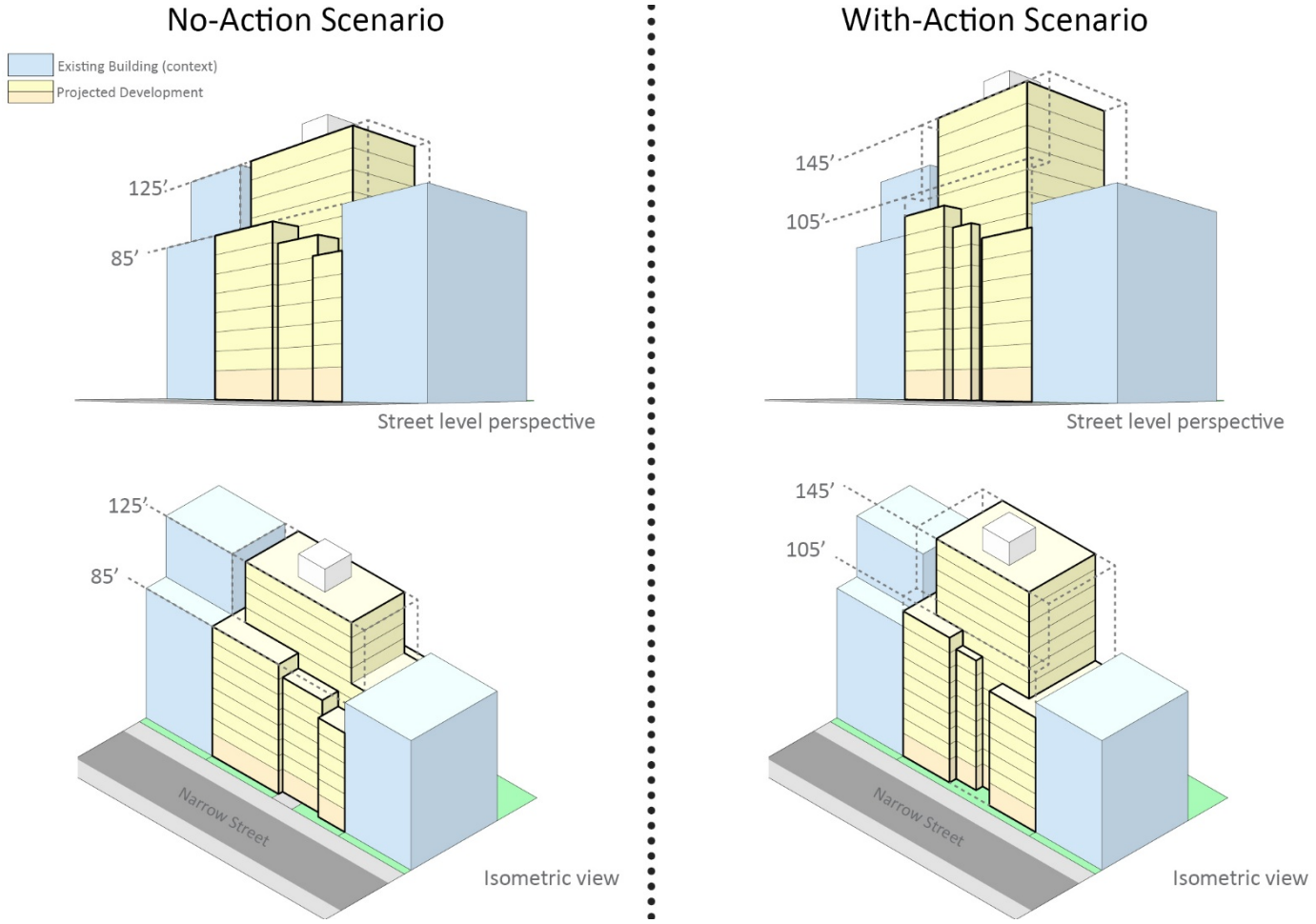
The prototype utilizes a generic 100' x 100' interior lot on a narrow street in the Transit Zone, in an R7X District within an Inclusionary Housing Designated Area. The prototype affords the opportunity to understand the effects of the following portions of the proposal on development:

- Update floor area ratio maximum for Affordable Independent Residences for Seniors
- Adjust Height Controls for Affordable Independent Residences for Seniors and Long-Term Care Facilities
- Permit residential accessory uses on ground floors in rear yards
- Eliminate parking requirements for Affordable Independent Residences for Seniors within the Transit Zone

Under the No-Action scenario, the building has a maximum height of 125' and would reach 12 stories tall, with approximately 50,000 square feet of development potential. This building, occupied entirely by Affordable Independent Residences for Seniors, would be able to fit 70 units in order to comply with the dwelling unit factor of 710, and would require 9 total parking spaces.

In the With-Action scenario, a higher floor area of 6.0 is permitted for Affordable Independent Residences for Seniors. Assuming an average unit size of 650 square feet in the absence of a dwelling unit factor for this type of development, 102 total AIRS units could be provided. The development would be permitted to utilize the modified requirements for parking and therefore provide 0 parking spaces. The with-action scenario would enable more housing units to be built with less parking over the no-action. The building could reach a maximum height of 145 feet, or 14 stories, representing an incremental increase of 20 feet over the no action.

Incremental changes as a result of the with-action scenario include an additional 20' height, a reduction in parking spaces per unit, and an additional 32 affordable units for seniors. There is an incremental increase of 11,000 gsf.



	No Action	With Action
Lot Area (square feet)	**10,000 sq. ft.**	**10,000 sq. ft.**
Permitted FAR	**5.0**	**6.0**
Permitted Development Rights (square feet)	**50,000 sq. ft.**	**60,000 sq. ft.**
Ground Floor / Upper Story Height	**15' / 10'**	**15' / 10'**
Building Depth	**60'**	**60'**
Number of Stories/Overall Height	**12/125'**	**14/145'**
Floor Area that can be accommodated (square feet)	**50,000 sq. ft.**	**60,000 sq. ft.**
Remaining Floor Area (square feet)	**0 sq. ft.**	**0 sq. ft.**
Difference in Buildable Floor Area (percent increase over No Action)		**20.0 %**
Gross Floor Area (square feet)	**55,000 sq. ft.**	**66,000 sq. ft.**
Total number of units (market-rate/affordable)	**70 (0/70) units**	**102 (0/102) units**
Number of parking required (market-rate/affordable)	**9 (0/9) spaces**	**0 (0/0) spaces**

Prototype 8: R7-2 District, Affordable Independent Residences for Seniors, 200' x 100' corner lot on wide and narrow streets

The prototype utilizes a generic 200' x 100' corner lot on a wide street adjacent to a rail line. These assumptions were chosen because of the prevalence of the zoning district throughout the city. The prototype affords the opportunity to understand the effects of the following portions of the proposal on development:

- Remove density and unit size limits for affordable senior housing
- Permit residential accessory uses on ground floors in rear yards
- Create a new non-contextual building envelope for certain types of affordable housing (R6-R10)
- Eliminate parking requirements for Affordable Independent Residences for Seniors within the Transit Zone

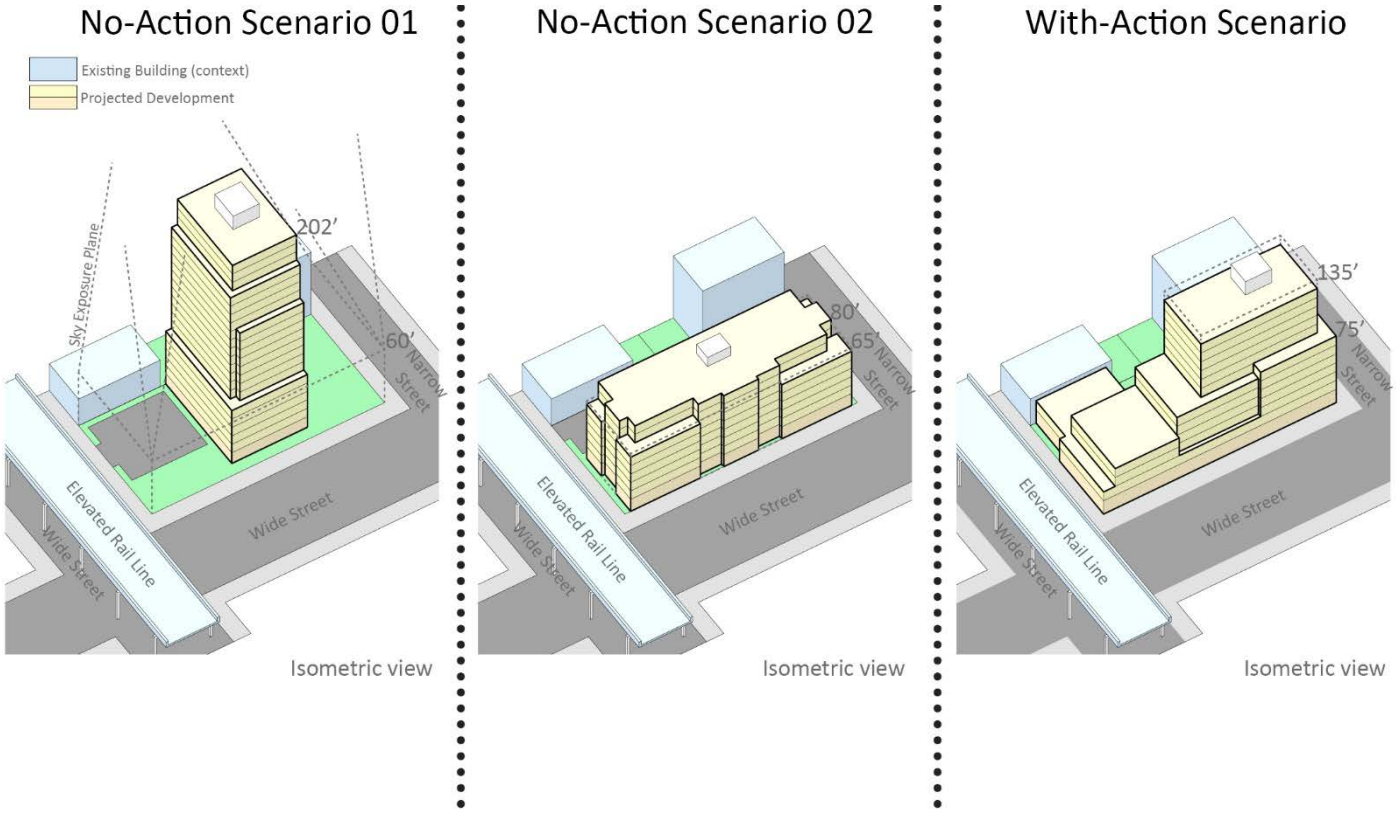
Two No-Action scenarios were modelled for this prototype to demonstrate the existing zoning framework. Under the No-Action Scenario 01, the affordable senior housing development does not utilize the Quality Housing regulations permitted in the zoning district because the building form would force units close to the rail line. Instead, the development utilizes the existing height factor building envelope controls allowed in non-contextual zoning districts which allow the building to be shifted away from the rail line. However, under these existing height factor regulations, the development would be forced into a smaller footprint with less practical floorplates for this housing type, because it is required to have a significant amount of open area to remain on the zoning lot. In order to maximize housing production under these conditions, the development consists of a 21-story tower in a zoning district with no height limit. The number of units in the affordable senior housing development is controlled by the existing dwelling unit factor and translates into a maximum of 141 units Eighteen parking spaces would be required for the 141 units.

Under No-Action Scenario 02, the affordable senior housing development utilizes the Quality Housing regulations. As shown in the Prototype, the resulting building is more contextual with its surroundings and floorplates are better suited to the programming needs of this type of housing, but a substantial portion of the building bulk is adjacent to the elevated rail, which adds cost and results in less desirable indoor space. Under this scenario, the development consists of an 80' tall building with 131 residential units with 16 parking spaces. In order to fit the parking on site, the development is built to a lower FAR and with fewer units than is permitted under zoning.

In the With-Action scenario, the affordable senior housing development is able to utilize best practices for residential buildings for floor-to-floor heights and is also able to set the building away from the rail line while providing a variety of building articulation options. The building reaches a maximum height of 125', or 12 stories, at the corner away from the elevated rail. The number of units in the affordable senior housing development is not restricted by a specific dwelling unit factor for the use but, based on comparable projects recently developed in the city which have an average unit size of approximately 650 square feet, the development would have approximately 170 units. No parking would be required for these units, freeing up lot area to accommodate the full permitted FAR and dwelling units, and facilitating the development of amenity space in the rear yard.

Incremental changes as a result of the with-action scenario over No-Action Scenario 01, include 18 fewer parking spaces, 30 additional affordable senior dwelling units, a building that is 77' shorter and with 6,010 additional gsf, and a modified building footprint on the lot that better relates to the adjacent elevated rail line.

Incremental changes as a result of the with-action scenario over No-Action Scenario 02, include 16 fewer parking spaces, 40 additional affordable senior dwelling units, a building that is 45' taller and with 25,160 additional gsf, and a modified building footprint on the lot that better relates to the adjacent elevated rail line



	No Action 01	No Action 02	With Action
Lot Area (square feet)	**20,000 sq. ft.**	**20,000 sq. ft.**	**20,000 sq. ft.**
Permitted FAR	**5.01**	**5.01**	**5.01**
Permitted Development Rights (square feet)	**100,200 sq. ft.**	**100,200 sq. ft.**	**100,200 sq. ft.**
Ground Floor / Upper Story Height	**13' / 9' -6"**	**13' / 9' -6"**	**15' / 10'**
Number of Stories/Overall Height	**21 (no limit)/202'**	**8/80'**	**12 (13 permitted)/ 125' (135' permitted)**
Floor Area that can be accommodated (square feet)	**100,200 sq. ft.**	**76,500 sq. ft.**	**100,200 sq. ft.**
Remaining Floor Area (square feet)	**0 sq. ft.**	**23,700 sq. ft.**	**0 sq. ft.**
Difference in Buildable Floor Area (percent increase over No Action)			**0 %**
Gross Floor Area (square feet)	**105,210 sq. ft.**	**85,060 sq. ft.**	**110,220 sq. ft.**
Total number of units (market-rate/affordable)	**141 (0/141) units**	**131 (0/131) units**	**170 (0/170) units**
Number of parking required (market-rate/affordable)	**18 (0/18) spaces**	**16 (0/16) spaces**	**0 (0/0) spaces**

Prototype 9: R7A District, Long-term Care Facility, 100’ x 100’ interior lot on narrow street

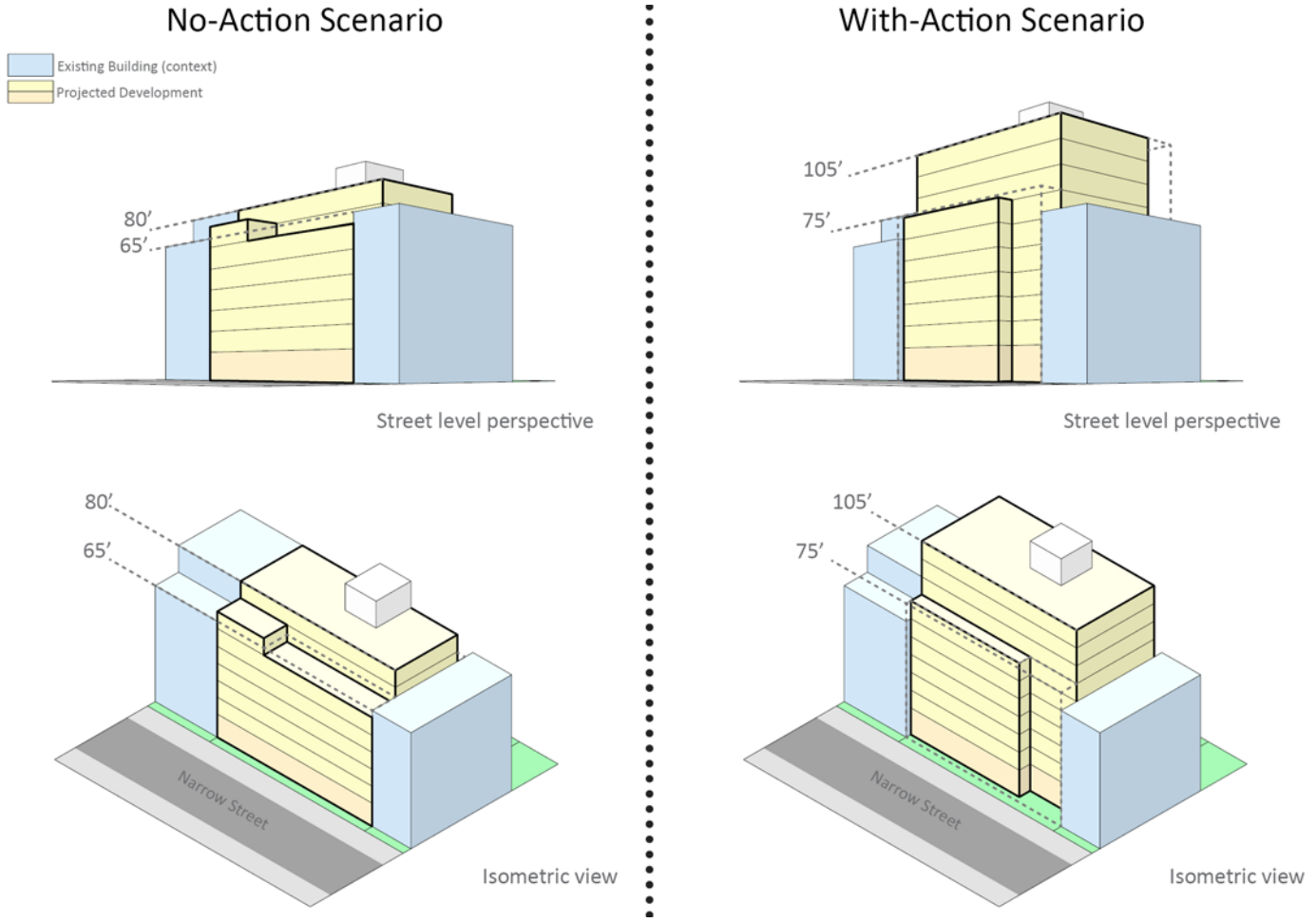
The prototype utilizes a generic 100’ x 100’ interior lot on a narrow street in an R7A district. These assumptions were chosen because of the significant increase in floor area permitted for this use under the Proposed Action. The prototype affords the opportunity to understand the effects of the following portions of the proposal on development:

- Update floor area ratio maximum for Long-Term Care facilities
- Create more-efficient building setback rules
- Adjust Height Controls for Affordable Independent Residences for Seniors and Long-Term Care Facilities
- Permit residential accessory uses on ground floors in rear yards

In the No-Action scenario, the Long-Term Care facility development is able to fit the existing floor area permitted for the use in this zoning district utilizing the existing Quality Housing building envelope controls required in contextual zoning districts. The building is limited to a height of 80’ and is able to fit the permitted 40,000 sq. ft. of floor area, in which approximately 76 beds for senior Long-Term Care would be available.

In the With-Action scenario, the Long-Term Care facility development is permitted a higher floor area ratio for the use, in line with the higher affordable senior housing FAR. The development fully accommodates this floor area by utilizing the Enhanced envelope controls afforded to buildings taking part in the Inclusionary Housing program or providing senior housing, and is able to achieve the permitted 50,100 sq. ft. of floor area. This amounts to 100 available beds. The development is able to utilize best practices for residential buildings for floor-to-floor heights, resulting in a building with a height of 105’, and is also able to set the building off the property line and provide a variety of building articulation options.

Incremental changes as a result of the with-action scenario include 25’ of additional allowable height, 24 additional beds for Long-Term Care, 13,110 additional gsf, and a modified building footprint on the lot. By utilizing the reduced setback requirement, the building has more flexibility in articulating the street wall without sacrificing floor area. Changes to building design facilitated by the Proposed Action enable the utilization of more efficient construction techniques while resulting in a better pedestrian experience at the sidewalk. Currently, a corresponding higher floor area is permitted by special permit only (as per 74-902). Additional floor area would allow Long-Term Care facilities potentially to develop larger buildings with a greater number of beds as-of-right.



	No Action	With Action
Lot Area (square feet)	**10,000 sq. ft.**	**10,000 sq. ft.**
Permitted FAR	**4.0**	**5.01**
Permitted Development Rights (square feet)	**40,000 sq. ft.**	**50,100 sq. ft.**
Ground Floor / Upper Story Height	**13' / 9'-6"**	**15' / 10'**
Number of Stories/Overall Height	**8/80'**	**10/105'**
Floor Area that can be accommodated (square feet)	**40,000 sq. ft.**	**50,100 sq. ft.**
Remaining Floor Area (square feet)	**0 sq. ft.**	**0 sq. ft.**
Difference in Buildable Floor Area (percent increase over No Action)		**25.3 %**
Gross Floor Area (square feet)	**42,000 sq. ft.**	**55,110 sq. ft.**
Total number of beds	**76 beds**	**100 beds**
Number of parking required (market-rate/affordable)	**0**	**0**

Prototype 10: R7A District, second building, 200’ x 200’ through lot on wide and narrow streets

The prototype utilizes a generic 200’ x 100’ lot on a wide street. These assumptions were chosen because they demonstrate a large enough lot where multiple buildings may be constructed to utilize the permitted floor area. The prototype affords the opportunity to understand the effects of the following portions of the proposal on development:

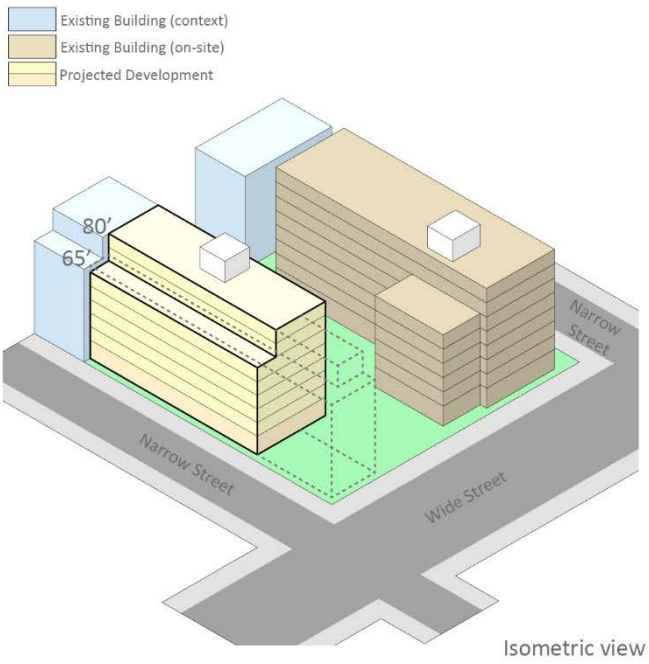
- Adjust height controls in moderate- and high-density districts
- Update outdated distance between buildings regulations

In the No-Action scenario, the second building is unable to develop the fully-permitted floor area because the current minimum distance between building requirements do not allow for a viable building footprint on the corner of the lot. The amount of floor area in the second building is maximized through the use of sub-optimal building floor-to-floor heights, particularly on the ground floor. Even still, the development is unable to develop approximately 26,215 square feet of floor area on the zoning lot which is 16.4 percent of the total permitted, due to the stringent requirement that there be 60’ between buildings. The resulting building achieves a floor area of 49,785 sq. ft., with approximately 61 dwelling units. The building height is limited to 80’.

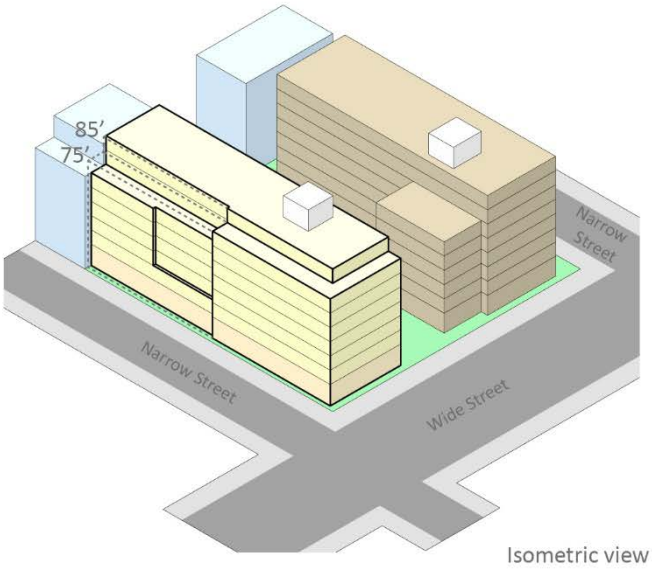
In the With-Action scenario, the distance between buildings requirements are reduced to 40’, as permitted by the New York State Multiple Dwelling Law, allowing for a viable building footprint on the corner of the lot. The building envelope allows for a maximum height of 85’ and a modest setback from the street. This allows the development to construct all the permitted floor area on the lot while providing building articulation at the façade, resulting in a building that is 76,000 sq. ft., or approximately 93 dwelling units.

Incremental changes as a result of the with-action scenario include 5’ of additional allowable height, 32 additional dwelling units on the lot, 26,215 additional gsf, and a modified building footprint on the lot. Changes to building design facilitated by the Proposed Action enable the utilization of more efficient construction techniques while resulting in a better pedestrian experience at the sidewalk.

No-Action Scenario



With-Action Scenario



	No Action	With Action
Lot Area (square feet)	40,000 sq. ft.	40,000 sq. ft.
Permitted FAR	4.0	4.0
Permitted Development Rights (square feet)	160,000 sq. ft.	160,000 sq. ft.
Existing Development	84,000 sq. ft.	84,000 sq. ft.
Remaining Permitted Floor Area	76,000 sq. ft.	76,000 sq. ft.
Ground Floor / Upper Story Height	13' / 9' -6"	15' / 10'
Building Depth	55'	55-57'
Number of Stories/Overall Height	8/80'	8/85'
Second Building Floor Area that can be accommodated (square feet)	49,785 sq. ft.	76,000 sq. ft.
Remaining Floor Area (square feet)	26,215 sq. ft.	0 sq. ft.
Difference in Buildable Floor Area (percent increase over No Action)		52.7%
Second Building Gross Floor Area (square feet)	54,763 sq. ft.	83,600 sq. ft.
Second Building Total number of units (market-rate/affordable)	61 (61/0) units	93 (93/0) units
Number of parking required (market-rate/affordable)	31 (31/0) spaces	47 (47/0) spaces

Prototype 11: R7A District, Affordable Independent Residences for Seniors, 200' x 200' through lot on wide and narrow streets

The prototype utilizes a generic 200' x 100' lot on a wide street within the Transit Zone. These assumptions were chosen because they represent a reasonable worst case scenario where the requirements for parking for the Affordable Independent Residences for Seniors have limited the ability of the lot to develop its full permitted floor area. The prototype affords the opportunity to understand the effects of the following portions of the proposal on development:

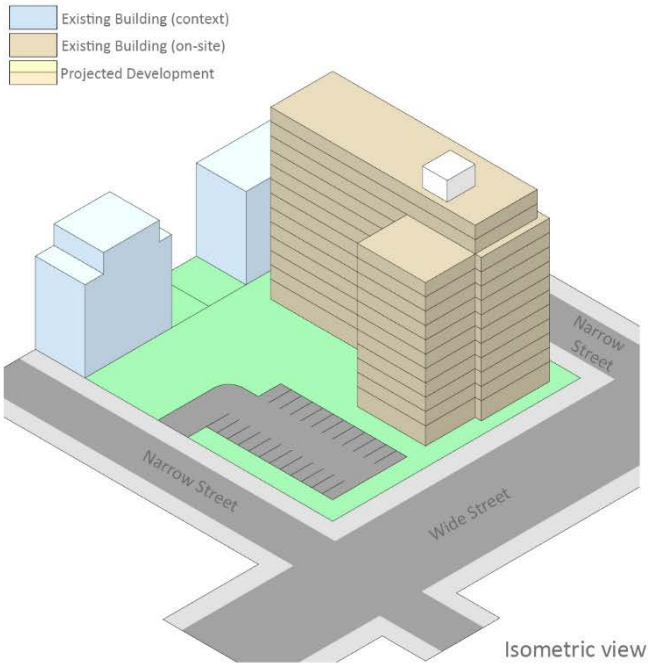
- Adjust Height Controls for Affordable Independent Residences for Seniors and Long-Term Care Facilities
- Eliminate existing and previously required parking for non-profit residences for the elderly or dwelling units for the elderly within the Transit Zone

In the No-Action scenario, the affordable independent housing for seniors is required to provide 24 parking spaces. In order to minimize costs, the required parking is provided unenclosed on the zoning lot. However, this makes a significant portion of the site unbuildable and therefore the site is not able to develop its fully permitted floor area. In this instance, nearly half of the permitted floor area (47.5 percent, or 100,000 sq. ft.) is unable to be developed. The building accommodates approximately 192 units of affordable senior housing, assuming an average unit size of approximately 710 sq. ft. as required by the dwelling unit factor, with 24 required parking spaces. Much of the surface parking lot is underutilized, as only approximately 9 residents likely have cars.

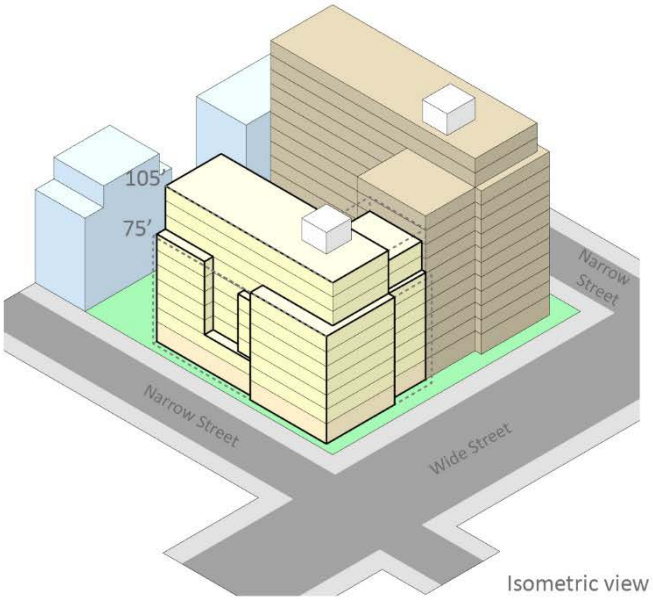
In the With-Action scenario, the requirement for the parking for the affordable independent housing for seniors is removed. This frees up that portion of the lot for development utilizing the remaining unused floor area. The second building on the zoning lot is able to develop all the remaining permitted floor area utilizing contemporary best practices for affordable senior housing construction, resulting in a total 213,624 square feet, or approximately 291 affordable senior housing units, assuming an average unit size of approximately 650 sq. ft. There would be no parking required for the new units.

Incremental changes as a result of the with-action scenario include infill development of a new building with approximately 199 additional dwelling units on the lot, 64,080 gsf, and a reduction of 24 previously required parking spaces.

No-Action Scenario



With-Action Scenario



	No Action	With Action
Lot Area (square feet)	40,000 sq. ft.	40,000 sq. ft.
Permitted FAR	5.01	5.01
Permitted Development Rights (square feet)	200,400 sq. ft.	200,400 sq. ft.
Existing Development	136,320 sq. ft.	136,320 sq. ft.
Remaining Floor Area	64,080 sq. ft.	64,080 sq. ft.
Ground Floor / Upper Story Height	N/A	14' / 10'
Building Depth	N/A	55
Number of Stories/Overall Height	N/A	10/105'
Floor Area that can be accommodated in new development (square feet)	N/A	64,080 sq. ft.
Difference in Buildable Floor Area (percent increase over No Action)		50.1%
Gross Floor Area: Existing/New (square feet)	143,136/0 sq. ft.	143,136/70,488 sq. ft.
Total number of units (market-rate/affordable)	192 (0/192) units	291 (0/291) units
Number of parking required	24	0

Prototype 12: R10A District, 100' x 100' interior lot on wide street

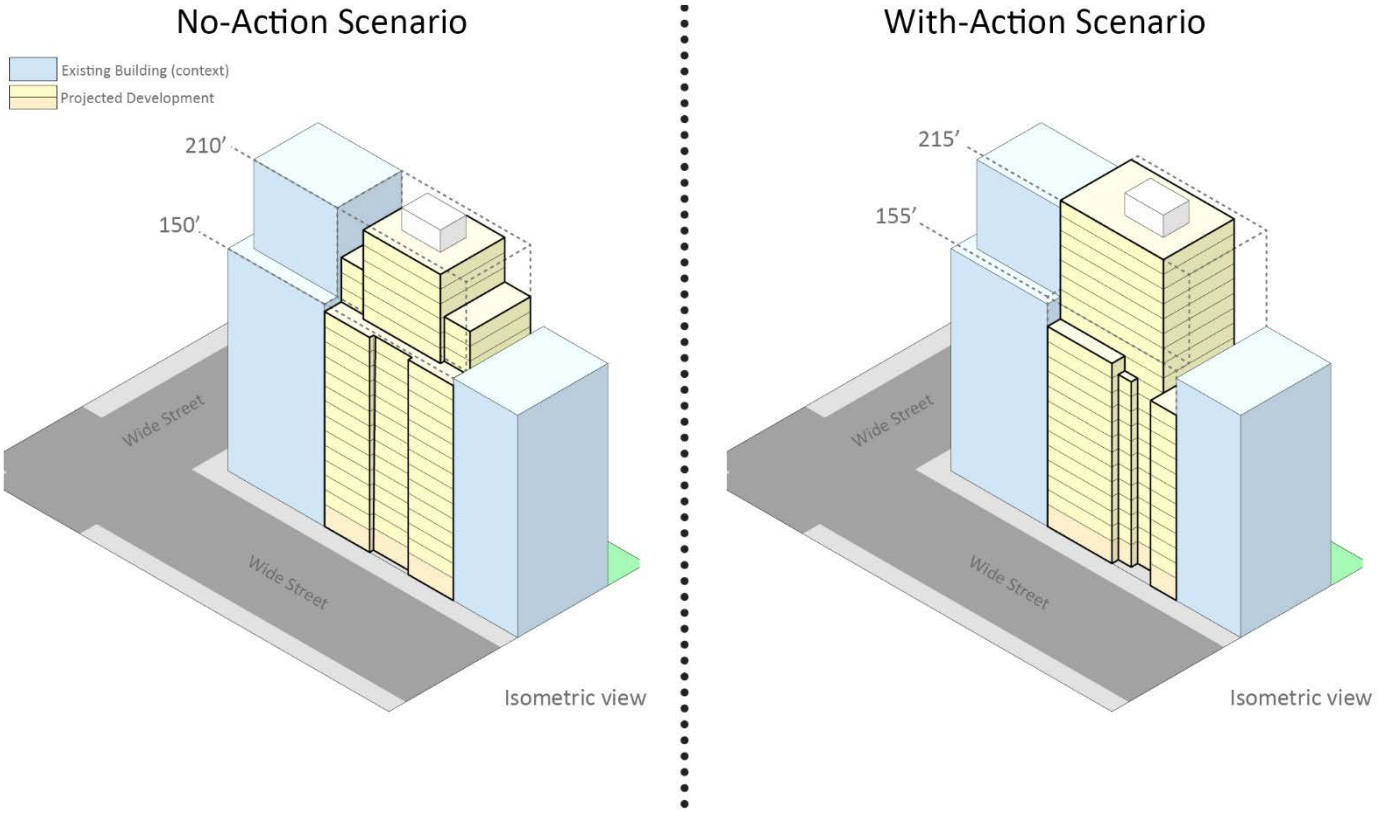
The prototype utilizes a generic 100' x 100' interior lot on a wide street in an R10A district. The prototype affords the opportunity to understand the effects of the following portions of the Proposed Action, as described in the Project Description, on development:

- Adjust height controls in moderate- and high-density districts
- Create more-efficient building setback rules
- Provide greater clarity and design opportunities in street wall regulations
- Match street wall line-up provision requirements to intent
- Provide more-useable court regulations
- Encourage elevated residential ground floors

In the No-Action scenario, the 100,000 sq. ft. of floor area permitted by the zoning district is accommodated in the existing building envelope, but doing so requires sub-optimal floor to floor heights, particularly on the ground floor. The building façade is flat with little articulation in order to allow for the maximum amount of floor area to fit within the envelope. The building is 65' deep and has a base height of 150' and a total height of 210'. Assuming an average unit size of 850 sq. ft. in a very high density zoning district, the development would be expected to generate 129 market-rate units. No parking would be expected, as parking may be waived in R10A districts on zoning lots of 10,000 sq. ft. or less.

In the With-Action scenario, the floor area permitted by the zoning district is also accommodated, but the modified building envelope allows the use of contemporary best practices for residential uses, including floor-to-floor heights, while also permitting a range of building articulation. The building is 65' deep and has a maximum base height of 155' and a total height of 215', or 21 stories. The With-Action scenario allows an incremental increase of 5 feet, but no additional square footage or residential dwelling units. Assuming an average unit size of 850 sq. ft. in a very high density zoning district, the development would be expected to generate 129 market-rate units. No parking would be expected, as parking may be waived in R10A districts on zoning lots of 10,000 sq. ft. or less.

Incremental changes as a result of the with-action scenario include an additional 5' height. No additional gross square footage or FAR is accommodated on the lot, but the changes to building design facilitated by the Proposed Action enable the utilization of more efficient construction techniques while resulting in a better pedestrian experience at the sidewalk. By utilizing the reduced setback requirement and courts regulation, the building has more flexibility in articulating the street wall without sacrificing floor area and at the same time taking advantage of more efficient construction techniques. Changes to building design facilitated by the Proposed Action result in a better pedestrian experience at the sidewalk.



	No Action	With Action
Lot Area (square feet)	**10,000 sq. ft.**	**10,000 sq. ft.**
Permitted FAR	**10.0**	**10.0**
Permitted Development Rights (square feet)	**100,000 sq. ft.**	**100,000 sq. ft.**
Ground Floor / Upper Story Height	**15' / 10'**	**15' / 10'**
Building Depth	**65'**	**65'**
Number of Stories/Overall Height	**20/205'**	**21/215'**
Floor Area that can be accommodated (square feet)	**100,000 sq. ft.**	**100,000 sq. ft.**
Remaining Floor Area (square feet)	**0 sq. ft.**	**0 sq. ft.**
Difference in Buildable Floor Area (percent increase over No Action)		**0 %**
Gross Floor Area (square feet)	**110,000 sq. ft.**	**110,000 sq. ft.**
Total number of units (market-rate/affordable)	**129 (129/0) units**	**129 (129/0) units**
Number of parking required (market-rate/affordable)	**0**	**0**

Prototype 13: R10A District, Inclusionary Housing, 100' x 100' interior lot on wide street

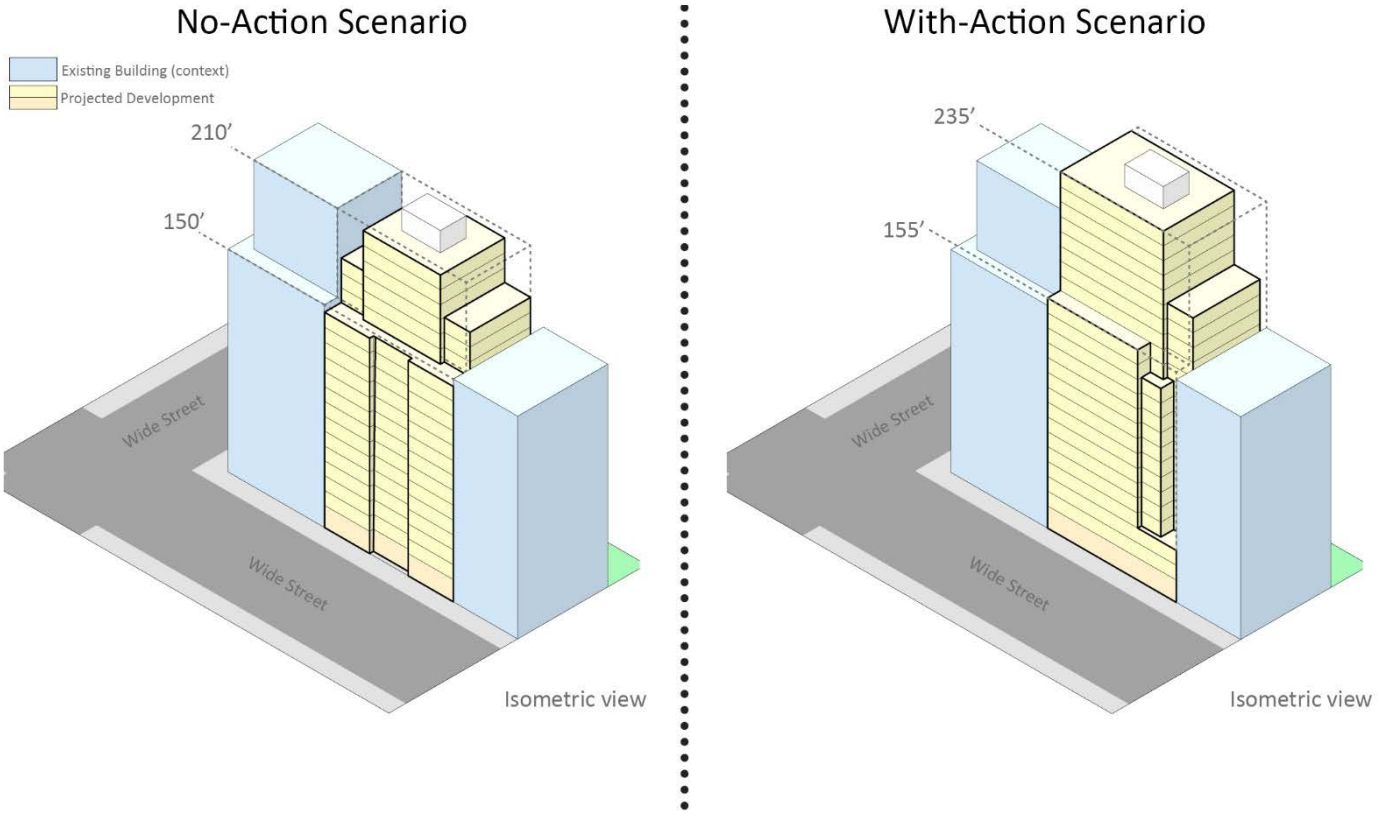
The prototype utilizes a generic 100' x 100' interior lot on a wide street in an R10A district with Inclusionary Housing. The prototype affords the opportunity to understand the effects of the following portions of the Proposed Action, as described in the Project Description, on development:

- Adjust height controls for Inclusionary Housing
- Create more-efficient building setback rules
- Provide greater clarity and design opportunities in street wall regulations
- Match street wall line-up provision requirements to intent
- Provide more-useable court regulations
- Encourage elevated residential ground floors

In the No-Action scenario, the building, participating in the IH program, has 12 FAR and 132,000 sq. ft. of gross floor area permitted by the zoning district and a maximum height of 210'. This floor area is accommodated in the existing building envelope, but doing so requires sub-optimal floor to floor heights, particularly on the ground floor. The building façade is flat with little articulation in order to allow for the maximum amount of floor area to fit within the envelope. The building is 70' deep and has a base height of 150' and a total height of 210'. Assuming an average unit size of 850 sq. ft. in a very high density zoning district, the development would be expected to generate 124 market-rate units and 31 affordable units. No parking would be expected, as parking may be waived in R10A districts on zoning lots of 10,000 sq. ft. or less.

In the With-Action scenario, the building, participating in the IH program, continues to have 12 FAR and 132,000 sq. ft. of gross floor area, but the maximum height is increased to 235'. This modified building envelope allows the use of contemporary best practices for residential uses, including floor-to-floor heights, while also permitting a range of building articulation. The building is 65' deep and has a maximum base height of 155' and a total height of 235', or 23 stories. Assuming an average unit size of 850 sq. ft. in a very high density zoning district, the development would be expected to generate 124 market-rate units and 31 affordable units. No parking would be expected, as parking may be waived in R10A districts on zoning lots of 10,000 sq. ft. or less.

The With-Action scenario allows an incremental increase of 25 feet, but no additional square footage or residential dwelling units. Although no additional gross square footage or FAR is accommodated on the lot, the changes to building design facilitated by the Proposed Action enable the utilization of more efficient construction techniques while resulting in a better pedestrian experience at the sidewalk.



	No Action	With Action
Lot Area (square feet)	10,000 sq. ft.	10,000 sq. ft.
Permitted FAR	12.0	12.0
Permitted Development Rights (square feet)	120,000 sq. ft.	120,000 sq. ft.
Ground Floor / Upper Story Height	12' / 9' -5"	15' / 10'
Building Depth	70'	65'
Number of Stories/Overall Height	22/210'	23/235'
Floor Area that can be accommodated (square feet)	120,000 sq. ft.	120,000 sq. ft.
Remaining Floor Area (square feet)	0 sq. ft.	0 sq. ft.
Difference in Buildable Floor Area (percent increase over No Action)		0 %
Gross Floor Area (square feet)	132,000 sq. ft.	132,000 sq. ft.
Total number of units (market-rate/affordable)	155 (124/31) units	155(124/31) units
Number of parking required (market-rate/affordable)	0	0

Prototype 14: C6-4A district (R10A equivalent commercial district), Inclusionary Housing, 100'x100' interior lot on narrow street

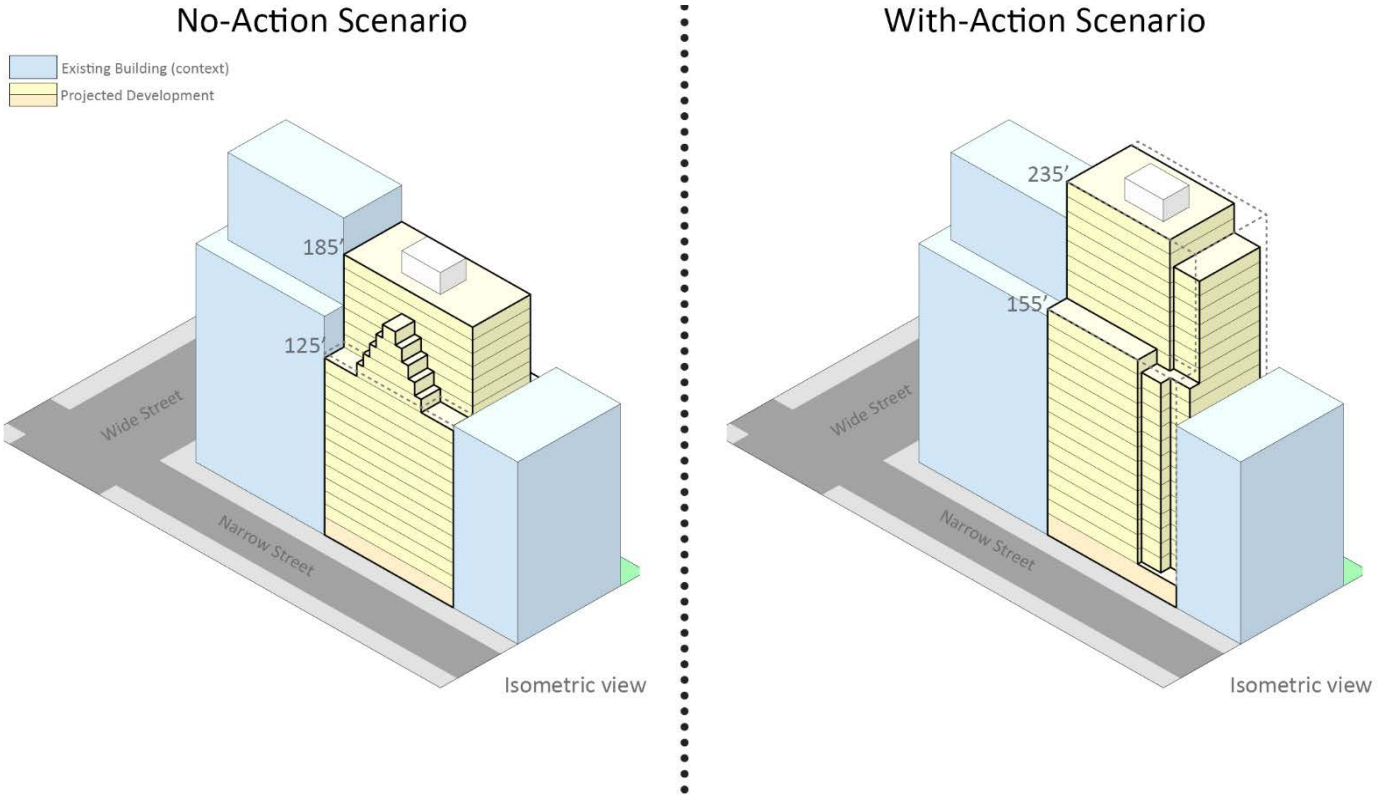
The prototype utilizes a generic 100' x 100' interior lot on a narrow street in a C6-4A district (R10A equivalent commercial district) with Inclusionary Housing. The prototype affords the opportunity to understand the effects of the following portions of the Proposed Action, as described in the Project Description, on development:

- Adjust height controls for Inclusionary Housing
- Create more-efficient building setback rules
- Provide greater clarity and design opportunities in street wall regulations
- Match street wall line-up provision requirements to intent
- Provide more-useable court regulations
- Encourage elevated residential ground floors

In the No-Action scenario, the building, participating in the IH program, has 12 FAR and 120,000 sq. ft. of gross floor area permitted by the zoning district and a maximum height of 185'. This floor area cannot be accommodated in the existing building envelope, and even with sub-optimal floor to floor heights, particularly on the ground floor, only 112,300 square feet of floor area is developed. The building façade is flat with little articulation in order to allow for the maximum amount of floor area to fit within the envelope. The building is 70' deep and has a base height of 125' and a total height of 185'. Assuming an average unit size of 850 sq. ft. in a very high density zoning district, the development would be expected to generate 118 market-rate units and 29 affordable units. No parking would be expected, as parking may be waived in R10A districts on zoning lots of 10,000 sq. ft. or less.

In the With-Action scenario, the building, participating in the IH program, continues to have 12 FAR and 120,000 sq. ft. of gross floor area, but the maximum height is increased to 235'. This modified building envelope allows the use of contemporary best practices for residential uses, including floor-to-floor heights, while also permitting a range of building articulation. The building is 65' deep and has a maximum base height of 155' and a total height of 235', or 23 stories. Assuming an average unit size of 850 sq. ft. in a very high density zoning district, the development would be expected to generate 124 market-rate units and 31 affordable units. No parking would be expected, as parking may be waived in R10A districts on zoning lots of 10,000 sq. ft. or less.

The With-Action scenario allows an incremental increase of 55 feet, 6 market rate units, and 2 affordable units, and 7,259 additional gsf overall. Changes to building design facilitated by the Proposed Action enable the utilization of more efficient construction techniques while resulting in a better pedestrian experience at the sidewalk.



	No Action	With Action
Lot Area (square feet)	10,000 sq. ft.	10,000 sq. ft.
Permitted FAR	12.0	12.0
Permitted Development Rights (square feet)	120,000 sq. ft.	120,000 sq. ft.
Ground Floor / Upper Story Height	12' / 9'	15' / 10'
Building Depth	70'	65'
Number of Stories/Overall Height	20/185'	23/235'
Floor Area that can be accommodated (square feet)	112,300 sq. ft.	120,000 sq. ft.
Remaining Floor Area (square feet)	7,700 sq. ft.	0 sq. ft.
Difference in Buildable Floor Area (percent increase over No Action)		0 %
Residential Gross Floor Area (square feet)	124,750 sq. ft.	132,000 sq. ft.
Commercial Gross Floor Area (square feet)	124,750 sq. ft.	132,000 sq. ft.
Total number of units (market-rate/affordable)	147 (118/29) units	155(124/31) units
Number of parking required (market-rate/affordable)	0	0

Prototype 15: R10A District, Inclusionary Housing, 40' x 100' interior lot on wide street

The prototype utilizes a 40' x 100' narrow interior lot on a wide street in an R10A Inclusionary Housing Designated area adjacent to 6-story residential buildings. These assumptions were chosen because they represent the greatest extent of change regarding the modifications to the provisions affecting narrow lots. The prototype affords the opportunity to understand the effects of the following portions of the proposal on development:

- Create more-efficient building setback rules
- Adjust height controls for Inclusionary Housing
- Remove narrow lot restrictions

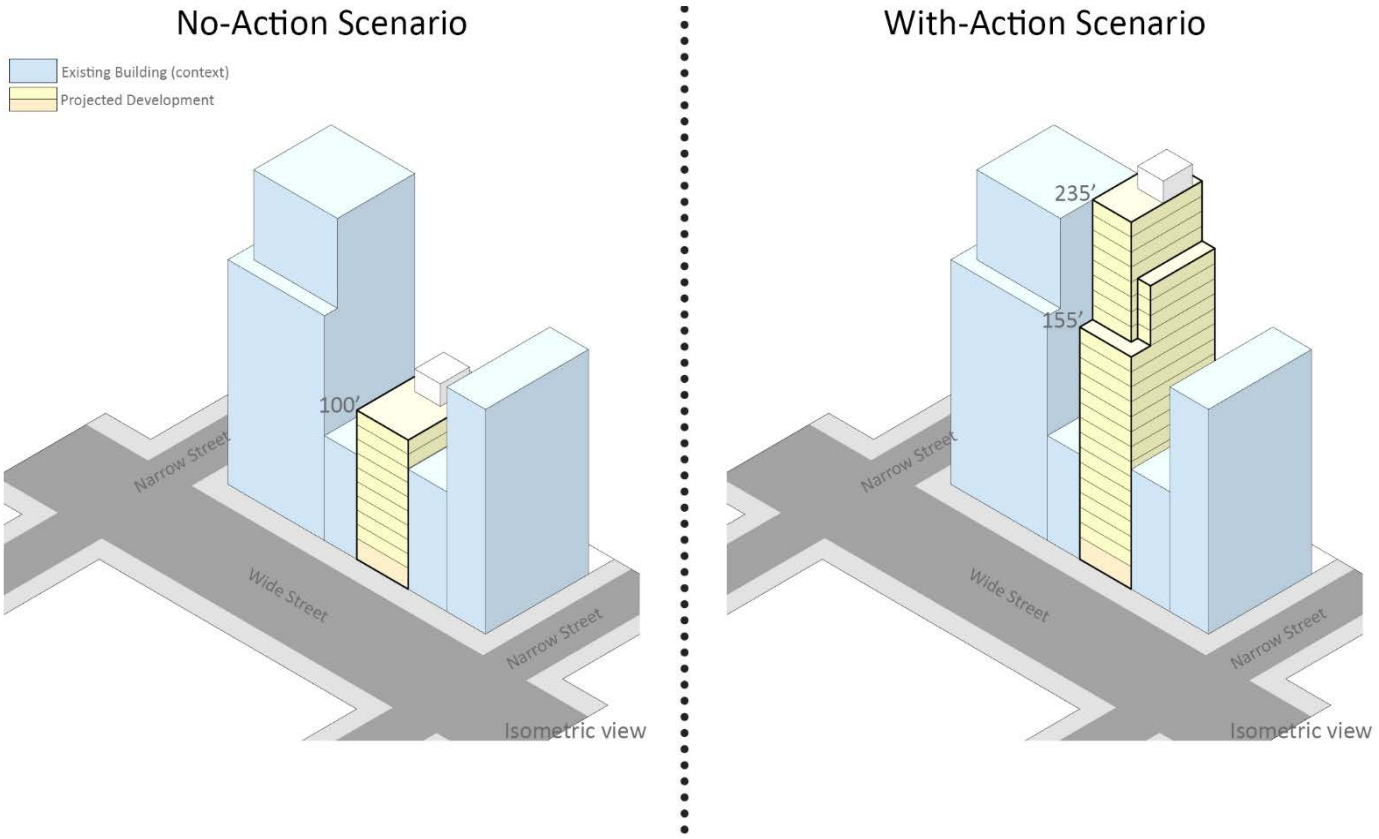
In the No-Action scenario, the development is restricted to the width of the adjacent wide street (in this case, 100 feet) because the lot is less than 45 feet wide and is located next to buildings that are less than 100 feet in height. The development takes part in the Inclusionary Housing Program but is not able to fit its permitted floor area, even with sub-optimal floor-to-floor heights and less-efficient residential units. The development would not be able to develop approximately 24,660 square feet of floor area. Assuming an average unit size of 850 sq. ft. in a very high density zoning district, the development would be expected to generate 25 market-rate units and 7 affordable units. No parking would be expected, as parking may be waived in R10A districts on zoning lots of 10,000 sq. ft. or less

In the With-Action scenario, the narrow lot development takes part in the Inclusionary Housing Program and is therefore permitted to be developed to the height permitted by the underlying zoning district, regardless of the width of the adjacent wide street or height of the adjacent buildings. The development is able to construct its permitted floor area, utilizing best practices for residential buildings.

The With-Action scenario facilitates in an incremental height increase 135 feet in a district where such heights would be permitted as of right on a wider development site. The development is able to fit the floor area associated with the R10A zoning district, 48,000 sq. ft. Assuming an average unit size of 850 sq. ft. in a very high density zoning district, the development would be expected to generate 50 market-rate units and 12 affordable units. No parking would be expected, as parking may be waived in R10A districts on zoning lots of 10,000 sq. ft. or less.

Incremental changes as a result of the with-action scenario include an additional 135' of building height, allowing for 25,674 additional gsf over the No-Action scenario, or approximately 30 additional dwelling units. There would be no parking change to the parking provided. Changes to building setback requirements facilitated by the Proposed Action enable the utilization of more efficient construction techniques.

While the Proposed Action would facilitate a change in building height or envelope for this development site, many underdeveloped narrow lots would have an opportunity to merge with an adjacent neighbor and develop to the full height permitted by the zoning district. However, since there would be cases where a merge is not possible, bulk-related impacts are also analyzed as part of this EIS. These impacts include: shadows; historic and cultural resource; urban design and visual resources; neighborhood character; natural resources; hazardous materials; noise; and air quality.



	No Action	With Action
Lot Area (square feet)	4,000 sq. ft.	4,000 sq. ft.
Permitted FAR	12.0	12.0
Permitted Development Rights (square feet)	48,000 sq. ft.	48,000 sq. ft.
Ground Floor / Upper Story Height	13' / 9' -6"	15' / 10'
Building Depth	70'	65'
Number of Stories/Overall Height	10/100'	23/235'
Floor Area that can be accommodated (square feet)	24,660 sq. ft.	48,000 sq. ft.
Remaining Floor Area (square feet)	23,340 sq. ft.	0 sq. ft.
Difference in Buildable Floor Area (percent increase over No Action)		48.6%
Gross Floor Area (square feet)	27,126 sq. ft.	52,800 sq. ft.
Total number of units (market-rate/affordable)	32 (25/7) units	62(50/12) units
Number of parking required (market-rate/affordable)	0	0

Prototype 16: R10 District, Inclusionary Housing utilizing increased density allowance, 100' x 100' corner lot on wide and narrow streets

The prototype utilizes a generic 100' x 100' corner lot adjacent to both a wide and narrow street in an R10 district, participating in the Inclusionary Housing R10 Program. The prototype affords the opportunity to understand the effects of the following portions of the Proposed Action, as described in the Project Description, on development:

- Modernize density factor and unit size requirements for R8-R10 Quality Housing buildings

In the No-Action scenario, the building, participating in the IH program, has 12 FAR and 120,000 sq. ft. of gross floor area permitted by the zoning district. While an average unit size of 850 sq. ft. is typically assumed in the city's highest density districts, some large buildings may prefer to allocate more of their square footage to smaller studios and 1 bedroom apartments, resulting in a smaller average unit sizes. In the No-Action scenario, this building is prevented from doing so because of its dwelling unit factor. The maximum number of dwelling units permitted in the development is determined by dividing the maximum residential floor area by the dwelling unit factor for its zoning district which, in the case of R10 districts, is 790. This results in a maximum 152 allowable number of units, 30 of which would be affordable under the Inclusionary Housing R10 program. Because the development occurs in an R10 district on a zoning lot of less than 10,000 square feet, parking requirements are waived and none is provided.

In the With-Action scenario, the building, participating in the IH program, continues to have 12 FAR and 132,000 sq. ft. of gross floor area, but the dwelling unit factor is 680. This allows the development to include a broader range of unit sizes, including more studios and one bedroom units to accommodate demand within the city's highest density districts. The adjusted dwelling unit factor enables the same development to accommodate 176 total dwelling units, 35 of which would be affordable under the Inclusionary Housing R10 program. Because the development occurs in an R10 district on a zoning lot of less than 10,000 square feet, parking requirements are waived and none is provided.

Incremental changes as a result of the With-Action scenario include an additional 24 dwelling units.

	No Action	With Action
Lot Area (square feet)	**10,000 sq. ft.**	**10,000 sq. ft.**
Permitted FAR	**12**	**12**
Permitted Development Rights (square feet)	**120,000 sq. ft.**	**120,000 sq. ft.**
Dwelling Unit Factor	**790**	**680**
Maximum Number of Units (market-rate/affordable)	**152 (122/30) units**	**176 (141/35) units**
Difference in number of units between No-Action and With-Action (percent change)		**24 units (15.8%)**
Gross Floor Area (square feet)	**132,000 sq. ft.**	**132,000 sq. ft.**
Number of parking required (market-rate/affordable)	**0**	**0**

Prototype 17: R8A District, Inclusionary Housing adjoining R6B District, 100' x 100' corner lot on wide and narrow streets

The prototype utilizes a generic 100' x 100' corner lot on a wide and narrow street in an R8A district adjoining a lower-density R6Bdistrict. These assumptions were chosen because they represent a likely scenario in the city with a great degree of difference between the permitted building forms in each zoning district. The prototype affords the opportunity to understand the effects of the following portions of the proposal on development:

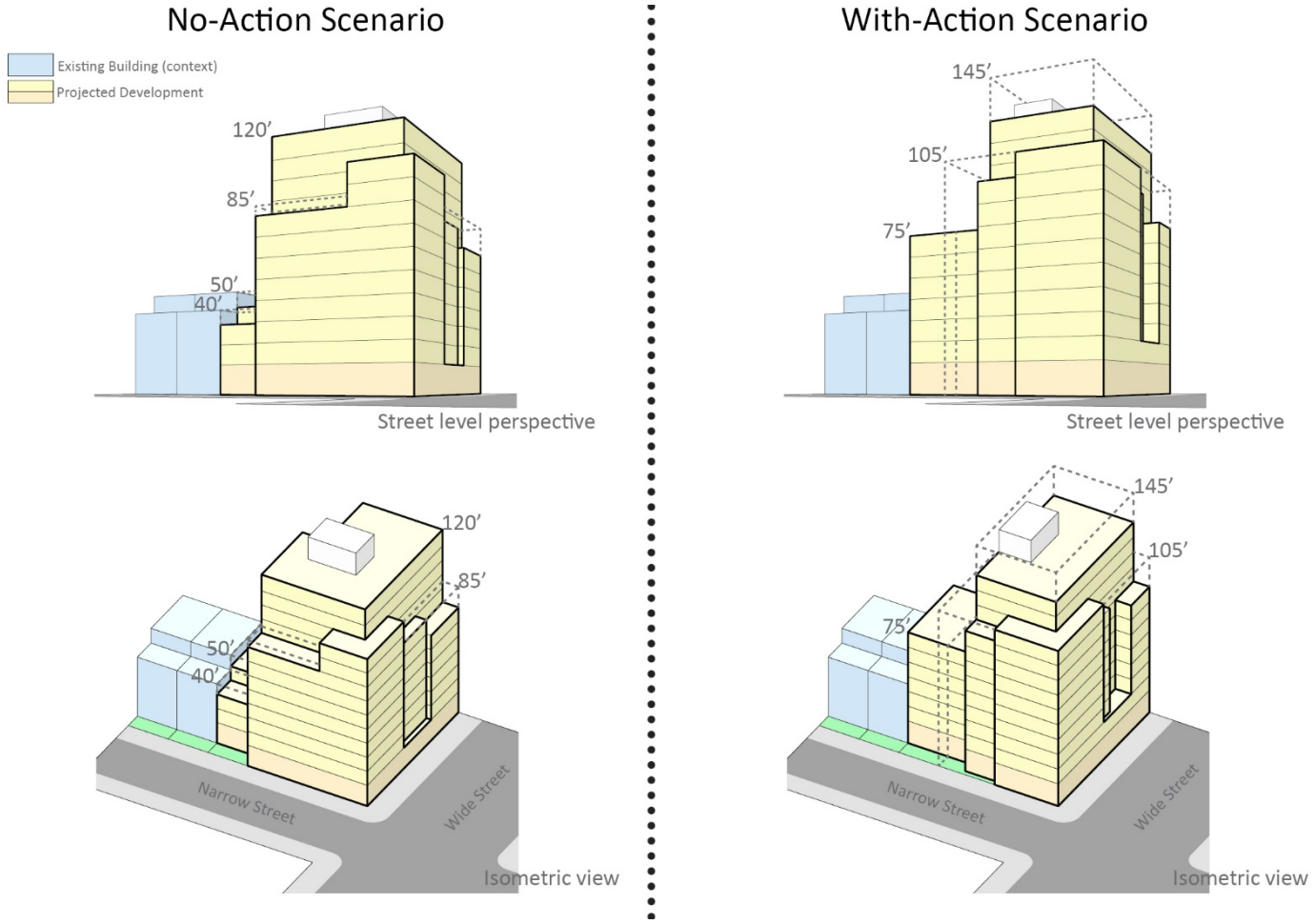
- Adjust height controls for Inclusionary Housing
- Create more-efficient building setback rules
- Remove unnecessary corner lot coverage restrictions
- Provide a more balanced building transition rule
- Provide greater clarity and design opportunities in street wall regulations
- Match street wall line-up provision requirements to intent
- Provide more-useable court regulations

In the No-Action scenario, the development utilizes the existing building envelope and additionally adheres to the current transition rules that require buildings be significantly lowered and set away from specific lower density districts. The development is able to fit its permitted floor area in the existing building envelope, but doing so requires the building to pack as many dwelling units into the existing envelope, by providing sub-optimal floor to floor heights, particularly on the ground floor. The building is 60' deep and has a maximum height of 120', or 12 stories. The building could accommodate approximately 88 dwelling units, 70 of which would be market-rate and 18 of which would be affordable. Because the lot is 10,000 sq. feet or less in an R8A district, no parking is required. The majority of the building's bulk is concentrated on one side of the lot.

In the With-Action scenario, the development utilizes the modified building envelope regulations and additionally adheres to the modified transition rules that permit buildings to develop up to their permitted base height adjacent to specific lower density districts. With the expanded envelope, the development is able to fit its permitted floor area while utilizing best practices for residential buildings and a range of building articulation. The building is 60' deep and fits its allowable floor area with a height of 125', or 20 stories, although a maximum height of 145', or 14 stories, is permitted. However, because greater bulk is allowed adjacent to the lower density district, the building does not need to maximize its allowable height.

The Proposed Action results in a building that could be 25', or two stories, taller, with higher quality ground floor lobby space. The building could continue to accommodate approximately 88 dwelling units, 70 of which would be market-rate and 18 of which would be affordable, but these units would be laid out more efficiently within a more appropriate building envelope. Because the lot is 10,000 sq. feet or less in an R8A district, no parking is required. The majority of the building's bulk is concentrated on one side of the lot.

Incremental changes as a result of the with-action scenario include an additional 25' height, a reduction of 16 parking spaces, and a modified building footprint on the lot. No additional gross square footage or FAR is accommodated on the lot, but the changes to building design facilitated by the Proposed Action enable the utilization of more efficient construction techniques while resulting in a better pedestrian experience at the sidewalk.



	No Action	With Action
Lot Area (square feet)	**10,000 sq. ft.**	**10,000 sq. ft.**
Permitted FAR	**7.2**	**7.2**
Permitted Development Rights (square feet)	**72,000 sq. ft.**	**72,000 sq. ft.**
Ground Floor / Upper Story Height	**14' / 9' -6"**	**15' / 10'**
Building Depth	**60'**	**60'**
Number of Stories/Overall Height	**12/120'**	**12(14 permitted)/ 125' (145' permitted)**
Floor Area that can be accommodated (square feet)	**72,000 sq. ft.**	**72,000 sq. ft.**
Remaining Floor Area (square feet)	**0 sq. ft.**	**0 sq. ft.**
Difference in Buildable Floor Area (percent increase over No Action)		**0 %**
Gross Floor Area (square feet)	**79,200 sq. ft.**	**79,200 sq. ft.**
Total number of units (market-rate/affordable)	**88 (70/18) units**	**88 (70/18) units**
Number of parking required (market-rate/affordable)	**0**	**0**

Prototype 18: R8A District, Inclusionary Housing, 100’ x 85’ shallow interior lot on wide street

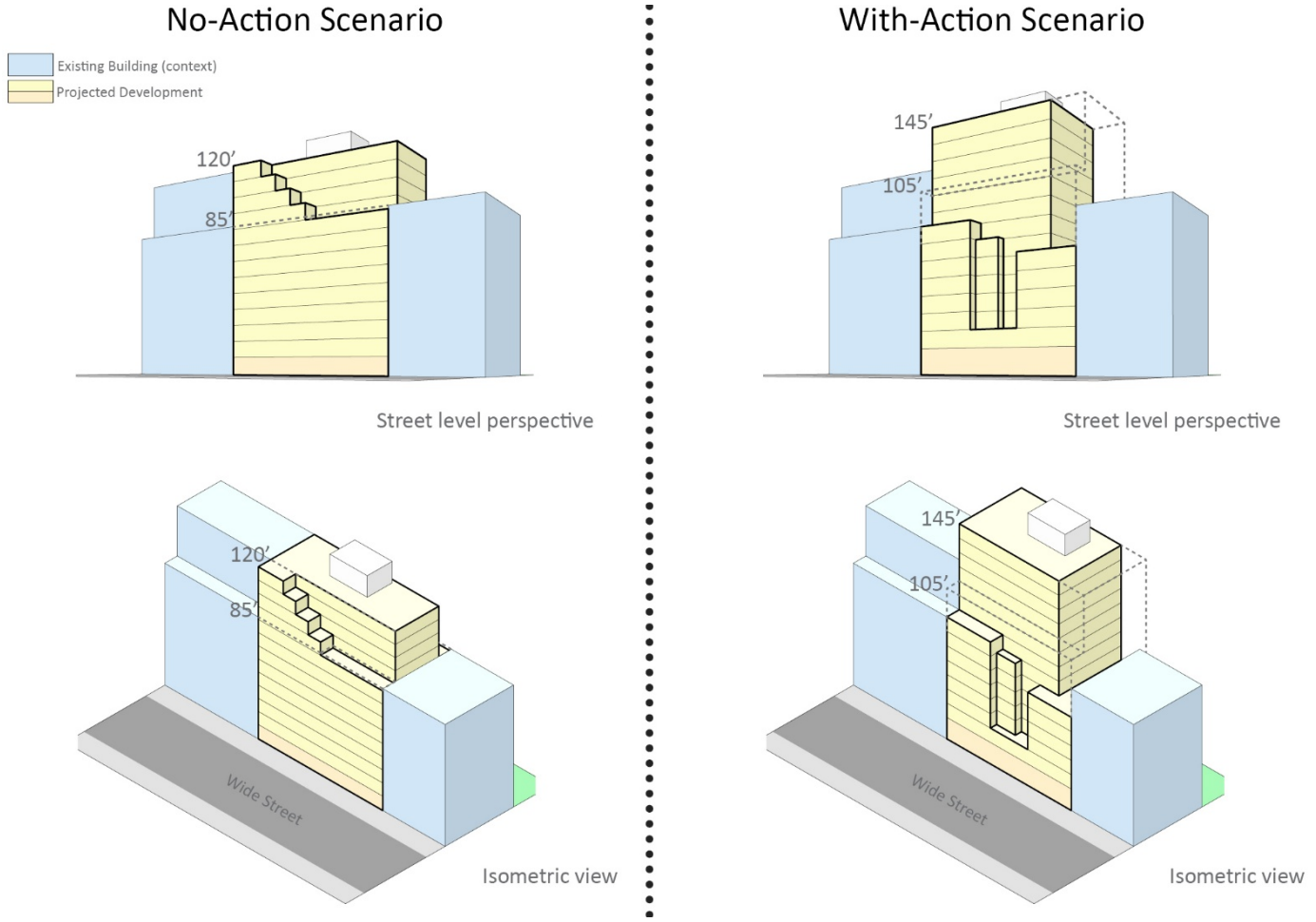
The prototype utilizes a 100’ wide x 85’ shallow interior lot in an R8A district, with Inclusionary Housing. The prototype affords the opportunity to understand the effects of the following portions of the proposal on development:

- Adjust height controls for Inclusionary Housing
- Create more-efficient building setback rules
- Provide improved yard and coverage regulations for shallow lots

In the No-Action scenario, the development is required to provide a full 30 foot rear yard regardless of the depth of the lot. When rear yard requirements were designed, lots were assumed to have a depth of 100’, and a 30’ rear yard was rational given those dimensions. Under the No-Action scenario on a lot with a depth of only 85’, the development is forced to build a building with only 55’ depth. Additionally, height limitations of 120’ result in a building that is unable to fit its entire permitted 7.2 FAR, leaving 2,790 sq. ft. of allowable floor area undeveloped. The building is able to provide 71 total units; 57 market-rate, and 14 affordable units. No parking is required as the zoning lot is 10,000 sq. ft. or less.

In the With-Action scenario, the development is permitted to reduce the depth of the required rear yard to 25 feet. This allows for a deeper floor plate more in line with typical residential construction. The development is able to fit all its permitted floor area using the modified building envelope controls, by achieving a height of 145’. The development is able to utilize best practices for residential buildings for floor to floor heights and is also able to provide a variety of building articulation options. The building is able to provide 75 total units; 60 market-rate, and 15 affordable units. No parking is required as the zoning lot is 10,000 sq. ft. or less.

Incremental changes as a result of the with-action scenario include an additional 25’ of allowable height, 3 additional dwelling units, 3,069 additional gsf, and a modified building footprint on the lot. Changes to building design facilitated by the Proposed Action enable the utilization of more efficient construction techniques while also resulting in a better pedestrian experience at the sidewalk.



	No Action	With Action
Lot Area (square feet)	**8,500 sq. ft.**	**8,500 sq. ft.**
Permitted FAR	**7.2**	**7.2**
Permitted Development Rights (square feet)	**61,200 sq. ft.**	**61,200 sq. ft.**
Ground Floor / Upper Story Height	**10' / 9' -1"**	**15' / 10'**
Building Depth	**55'**	**60'**
Number of Stories/Overall Height	**13/120'**	**14/145'**
Floor Area that can be accommodated (square feet)	**58,410 sq. ft.**	**61,200 sq. ft.**
Remaining Floor Area (square feet)	**2,790 sq. ft.**	**0 sq. ft.**
Difference in Buildable Floor Area (percent increase over No Action)		**4.8 %**
Gross Floor Area (square feet)	**64,251 sq. ft.**	**67,320 sq. ft.**
Total number of units (market-rate/affordable)	**76 (61/15) units**	**79 (63/16) units**
Number of parking required (market-rate/affordable)	**0**	**0**

Prototype 19: R8A District, Inclusionary Housing, 100’ x 170’ shallow through lot on wide and narrow streets

The prototype utilizes a 100’ wide x 170’ shallow interior through lot in an R8A district, with Inclusionary Housing. The prototype affords the opportunity to understand the effects of the following portions of the proposal on development:

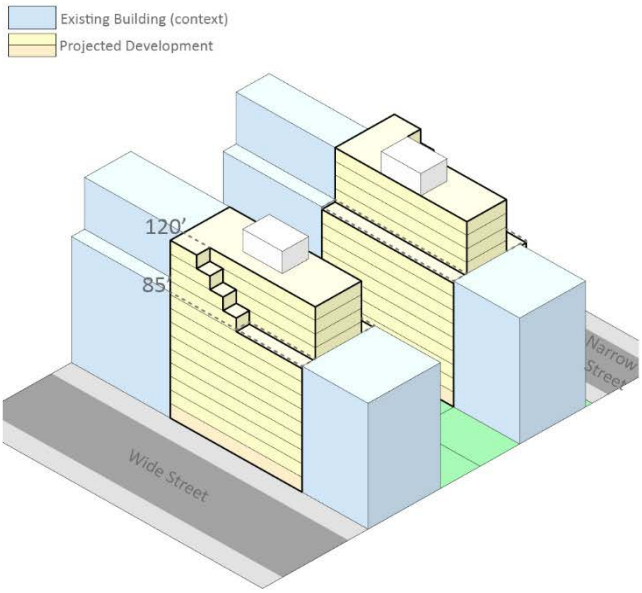
- Adjust height controls for Inclusionary Housing
- Create more-efficient building setback rules
- Provide improved yard and coverage regulations for shallow lots
- Eliminate parking requirements for qualifying affordable housing within the Transit Zone

In the No-Action scenario, the development is required to provide a full 60 foot rear yard equivalent regardless of the depth of the lot. When rear yard requirements were designed, interior through lots were assumed to have a depth of 200’, and a combined 60’ rear yard was rational given those dimensions. Under the No-Action scenario on a lot with a depth of only 170’, the development is forced to build two buildings with only 55’ depth. Additionally, height limitations of 120’ result in a development that is unable to fit its entire permitted 7.2 FAR, leaving 6,800 sq. ft. of allowable floor area undeveloped. The building is able to provide 150 total units; 120 market-rate, and 30 affordable units. Fifty two parking spaces are required; 48 required for the market-rate units, and 4 for the affordable units.

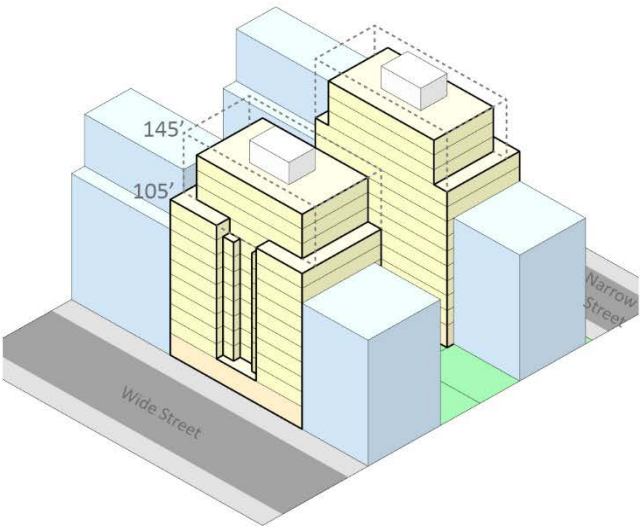
In the With-Action scenario, the development is permitted to reduce the depth of the required rear yard to 50 feet. This allows for a deeper floor plate depth more in line with typical residential construction. The development is able to fit all its permitted floor area using the modified building envelope controls, by achieving a height of 145’. The development is able to utilize best practices for residential buildings for floor to floor heights and is also able to provide a variety of building articulation options. The building is able to provide 158 total units; 126 market-rate, and 32 affordable units. Fifty parking spaces are required; 50 for the market-rate units, and none for the affordable units.

Incremental changes as a result of the with-action scenario include an additional 25’ height, an increase of 2 parking spaces, an additional 8 dwelling units, 7,480 additional gsf, and a modified building footprint on the lot. Changes to building design facilitated by the Proposed Action enable the utilization of more efficient construction techniques while resulting in a better pedestrian experience at the sidewalk.

No-Action Scenario



With-Action Scenario



	No Action	With Action
Lot Area (square feet)	17,000 sq. ft.	17,000 sq. ft.
Permitted FAR	7.2	7.2
Permitted Development Rights (square feet)	122,400 sq. ft.	122,400 sq. ft.
Ground Floor / Upper Story Height	10' / 9' -3"	15' / 10'
Building Depth	55'	60'
Number of Stories/Overall Height	13/120'	13 (14 permitted)/ 135' (145' permitted)
Floor Area that can be accommodated (square feet)	115,600 sq. ft.	122,400 sq. ft.
Remaining Floor Area (square feet)	6,800 sq. ft.	0 sq. ft.
Difference in Buildable Floor Area (percent increase over No Action)		5.9 %
Gross Floor Area (square feet)	127,160 sq. ft.	134,640 sq. ft.
Total number of units (market-rate/affordable)	150 (120/30) units	158 (126/32) units
Number of parking required (market-rate/affordable)	52 (48/4) spaces	50 (50/0) spaces

Prototype 20: R8 District, Affordable Independent Residences for Seniors, 200' x 100' corner lot on wide and narrow streets

The prototype utilizes a generic 200' x 100' corner lot on wide and narrow streets adjacent to a rail line in an R8 non-contextual district. These assumptions were chosen because of the prevalence of the zoning district throughout the city. The prototype affords the opportunity to understand the effects of the following portions of the proposal on development:

- Update floor area ratio maximum for Affordable Independent Residences for Seniors
- Remove density and unit size limits for affordable senior housing
- Create a new higher-density non-contextual building envelope for certain types of housing on zoning lots adjacent to certain types of infrastructure– Long-Term Care Facilities
- Eliminate parking requirements for Affordable Independent Residences for Seniors within the Transit Zone

In the No-Action scenario, there are two development options for non-profit residences for the elderly in a non-contextual district. The first, shown under No-Action Scenario 01, models a building utilizing the existing height factor building envelope controls allowed in non-contextual zoning districts, which provide no height limit and which allow the building to be shifted away from the rail line, and provides parking at grade next to the rail line. The second, shown under No-Action Scenario 02, models a building utilizing the Quality Housing regulations permitted in the zoning district. While this is a permitted envelope for this type of use, it is unlikely to be used, as the building form forces units close to the rail line. However, because this scenario is possible no matter how unlikely, both are analyzed for the purposes of this environmental review.

Under No-Action Scenario 01, Non-Profit Residences for the Elderly are permitted 6.02 FAR, and R8 zoning districts have a dwelling unit factor of 740. This limits the number of units that may be developed to 162, with a parking requirement of 16. There are no parking waivers available to Non-Profit Residences for the Elderly. With no height limit, the building develops to a height of 21 stories, with small floorplates ill-suited for this type of housing.

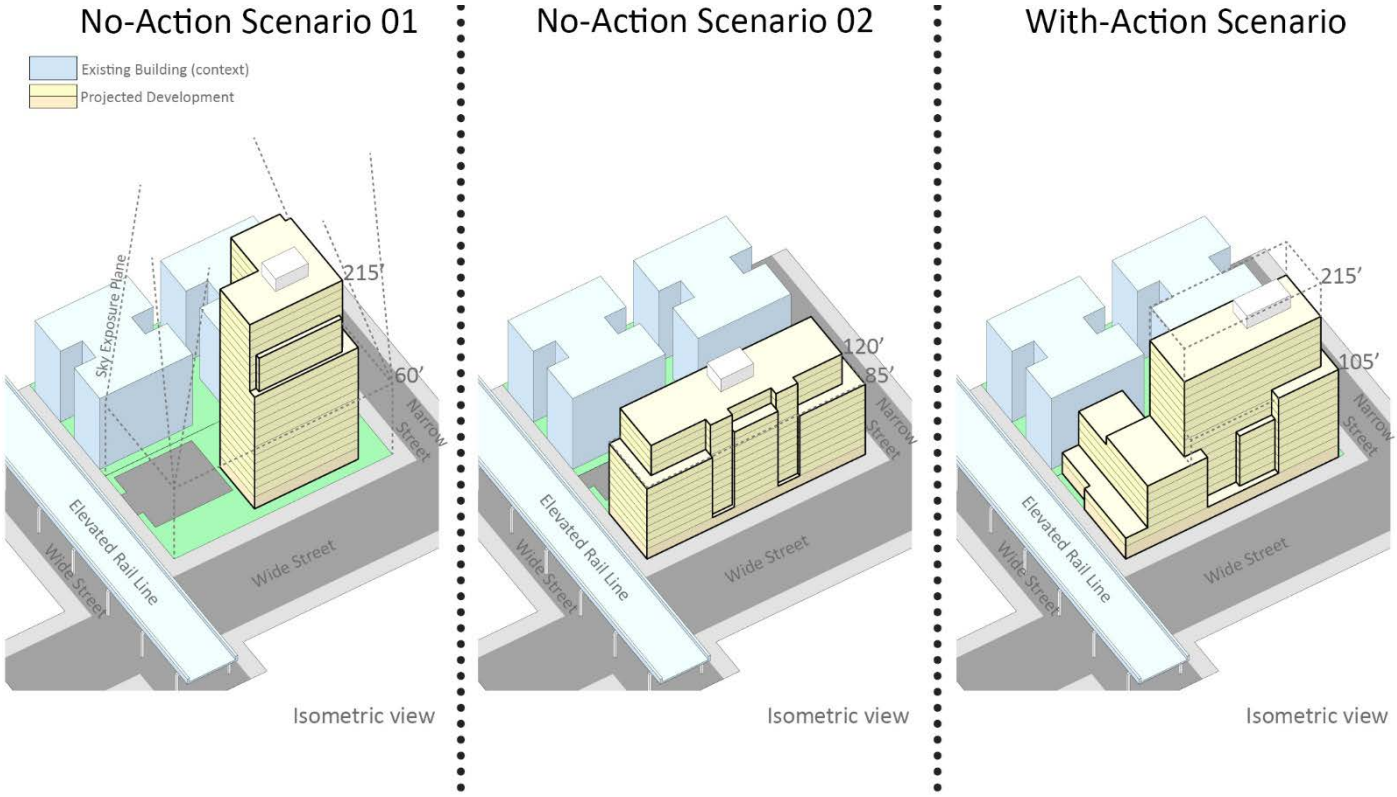
Under No-Action Scenario 02, Non-Profit Residences for the Elderly are permitted 6.02 FAR, and R8 zoning districts have a dwelling unit factor of 740. This limits the number of units that may be developed to 162, with a parking requirement of 16. There are no parking waivers available to Non-Profit Residences for the Elderly. Under the Quality Housing height limit of 120' in an R8 district, squeezing 13 stories into the development in order to maximize their FAR.

In the With-Action scenario, the Affordable Independent Residences for Seniors in an R8 district is allowed an FAR of 7.2, and is given a contextual building envelope that works with the existing built context of the rail line. The development is able to utilize best practices for residential buildings for floor-to-floor heights and is also able to set the residential units within the building away from the rail line while providing a variety of building articulation options. The building can achieve a maximum height of 215' or 21 stories, although the full height is not necessary for the development to fit its permitted FAR. The number of units for low income seniors is not restricted by a specific dwelling unit factor for the use but, based on comparable projects recently developed in the city which have an average unit size of approximately 650 square feet, the development would have approximately 243 units. No parking would be required for these units.

Incremental changes as a result of the With-Action scenario over No-Action Scenario 01 include 16 fewer parking spaces, 81 additional affordable senior dwelling units, 31,980 additional gsf, and a modified building footprint that is more contextual with the surrounding neighborhood and accommodates larger floorplates for more efficient programming for this type of building. The With-Action building is 50' shorter.

Incremental changes as a result of the with-action scenario over No-Action Scenario 02 include 16 fewer parking spaces, 81 additional affordable senior dwelling units, 45' additional height, 25,960 additional gsf, and a modified building footprint on the lot that better relates to the adjacent elevated rail line.

Changes to building design facilitated by the Proposed Action enable the utilization of more efficient construction techniques while resulting in a better pedestrian experience at the sidewalk. No parking would be required for these units, freeing up lot area to accommodate the full permitted FAR and dwelling units, and facilitating the development of amenity space in the rear yard.



	No Action 01	No Action 02	With Action
Lot Area (square feet)	**20,000 sq. ft.**	**20,000 sq. ft.**	**20,000 sq. ft.**
Permitted FAR	**6.02**	**6.02**	**7.2**
Permitted Development Rights (square feet)	**120,400 sq. ft.**	**120,400 sq. ft.**	**144,000 sq. ft.**
Ground Floor / Upper Story Height	**12' / 9' -6"**	**12' / 9'**	**15' / 10'**
Building Depth	**60'**	**55'**	**60'**
Number of Stories/Overall Height	**21 (no limit)/215'**	**13/120'**	**16 (21 permitted)/ 165' (215' permitted)**
Floor Area that can be accommodated (square feet)	**120,400 sq. ft.**	**120,400 sq. ft.**	**144,000 sq. ft.**
Remaining Floor Area (square feet)	**0 sq. ft.**	**0 sq. ft.**	**0 sq. ft.**
Difference in Buildable Floor Area (percent increase over No Action)			**19.6 %**
Gross Floor Area (square feet)	**126,420 sq. ft.**	**132,440 sq. ft.**	**158,400 sq. ft.**
Total number of units (market-rate/affordable)	**162 (0/162) units**	**162 (0/162) units**	**243 (0/243) units**
Number of parking required (market-rate/affordable)	**16 (0/16) spaces**	**16 (0/16) spaces**	**0 (0/0) spaces**

Prototype 21: C6-3A District (R9A equivalent commercial district), Inclusionary Housing with ground floor commercial, acutely angled corner lot on wide and narrow streets

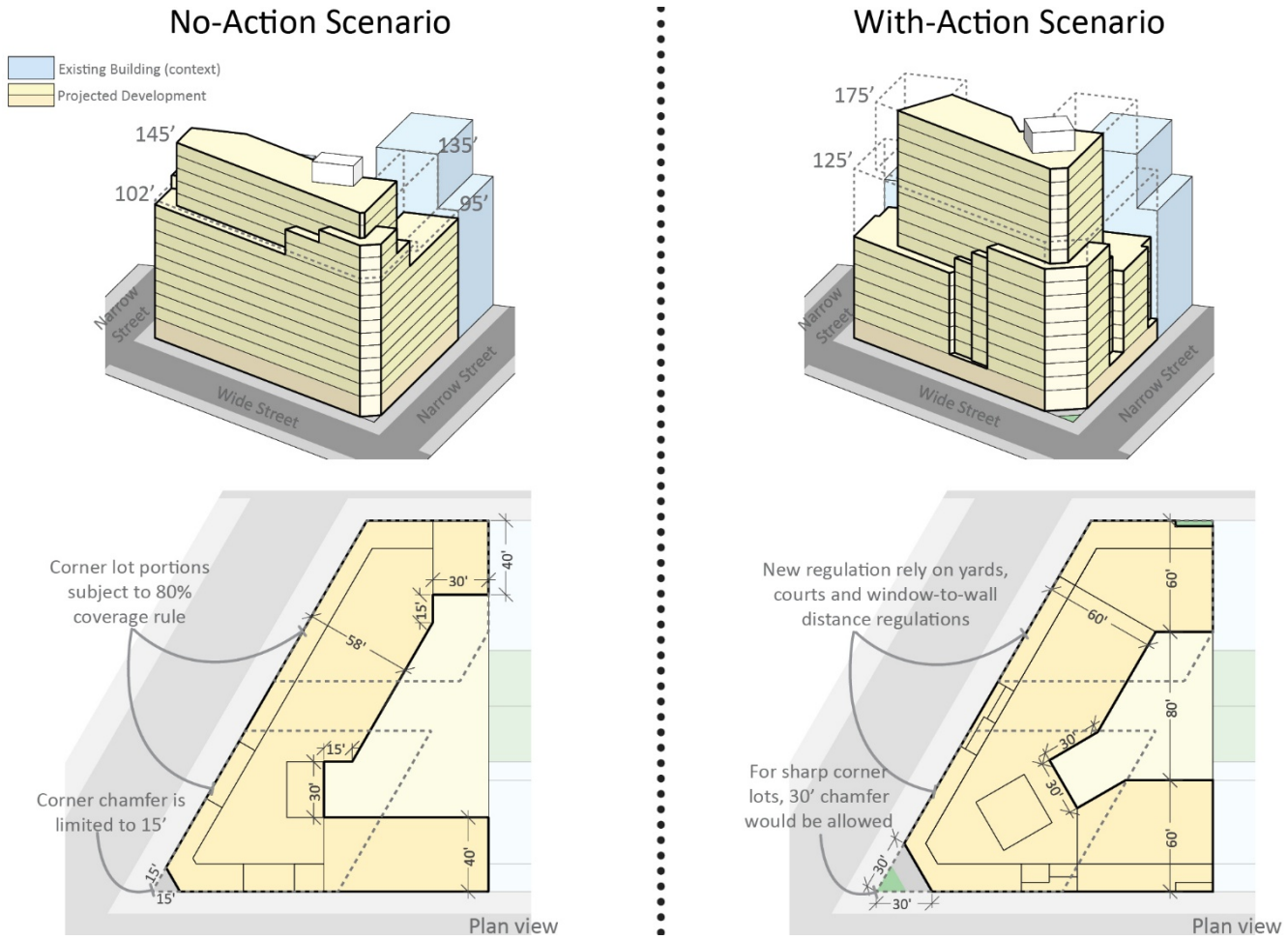
The prototype utilizes an acutely angled lot in a C6-3A district with Inclusionary Housing and ground floor commercial uses adjacent to a wide street and a narrow street. The prototype affords the opportunity to understand the effects of the following portions of the proposal on development:

- Rationalize street wall requirements for acutely-angled sites
- Remove unnecessary corner lot coverage restrictions
- Adjust height controls for Inclusionary Housing
- Eliminate parking requirements for qualifying affordable housing within the Transit Zone

In the No-Action scenario, the site has a permitted FAR of 8.5, with 207,515 gross sq. ft. of residential, and 20,580 gross sq. ft. of commercial. Because of the 100% lot coverage requirement in this zoning district, coupled with the acutely angled lot, the building is allowed only within 15' of the corner to allow for articulation. This limited flexibility adds cost and complexity to the development of buildings on lots with angles of less than 75 degrees. The building is able to fit its full permitted floor area on site, with 244 dwelling units; 195 market-rate and 49 affordable. The development generates 84 parking spaces – 78 for the market rate units, and 6 for the affordable units.

In the With-Action scenario, the site has the same permitted FAR of 8.5, with no change to the gross square footage or number of dwelling units. The number of required parking spaces is reduced to 78, as there is no parking requirement for affordable housing in a C6-3A district in the future with the Proposed Action.

Incremental changes as a result of the with-action scenario include a modified building footprint on the lot that better relates to the adjacent elevated rail line, and 6 fewer parking spaces. No additional gross square footage or FAR is permitted on the lot, but the changes to building design facilitated by the Proposed Action enable the utilization of more efficient construction techniques while resulting in a better pedestrian experience at the sidewalk.



	No Action	With Action
Lot Area (square feet)	**24,500 sq. ft.**	**24,500 sq. ft.**
Permitted FAR	**8.5**	**8.5**
Permitted Development Rights (square feet)	**208,250 sq. ft.**	**208,250 sq. ft.**
Ground Floor / Upper Story Height	**15' / 9' -3"**	**15' / 10'**
Building Depth	**40'-58'**	**60'**
Number of Stories/Overall Height	**15/145'**	**17/175'**
Floor Area that can be accommodated (square feet)	**208,250 sq. ft.**	**208,250 sq. ft.**
Difference in Buildable Floor Area (percent increase over No Action)		**0 %**
Residential Gross Floor Area (square feet)	**207,515 sq. ft.**	**207,515 sq. ft.**
Commercial Gross Floor Area (square feet)	**20,580 sq. ft.**	**20,580 sq. ft.**
Total number of units (market-rate/affordable)	**244 (195/49) units**	**244 (/49) units**
Number of parking required (market-rate/affordable)	**84 (78/6) spaces**	**78 (78/0) spaces**

Prototype 22: R8 District, Affordable Independent Residences for Seniors, 200' x 100' interior lot on narrow street

Note: the image shown on the following page has been updated to reflect a technical correction. The envelope depicted under the With-Action Scenario showed a maximum permitted height of 125' when it should have shown 145'.

The prototype utilizes a generic 200' x 100' interior lot on a narrow street. These assumptions were chosen because of the prevalence of the zoning district throughout the city. The prototype affords the opportunity to understand the effects of the following portions of the proposal on development:

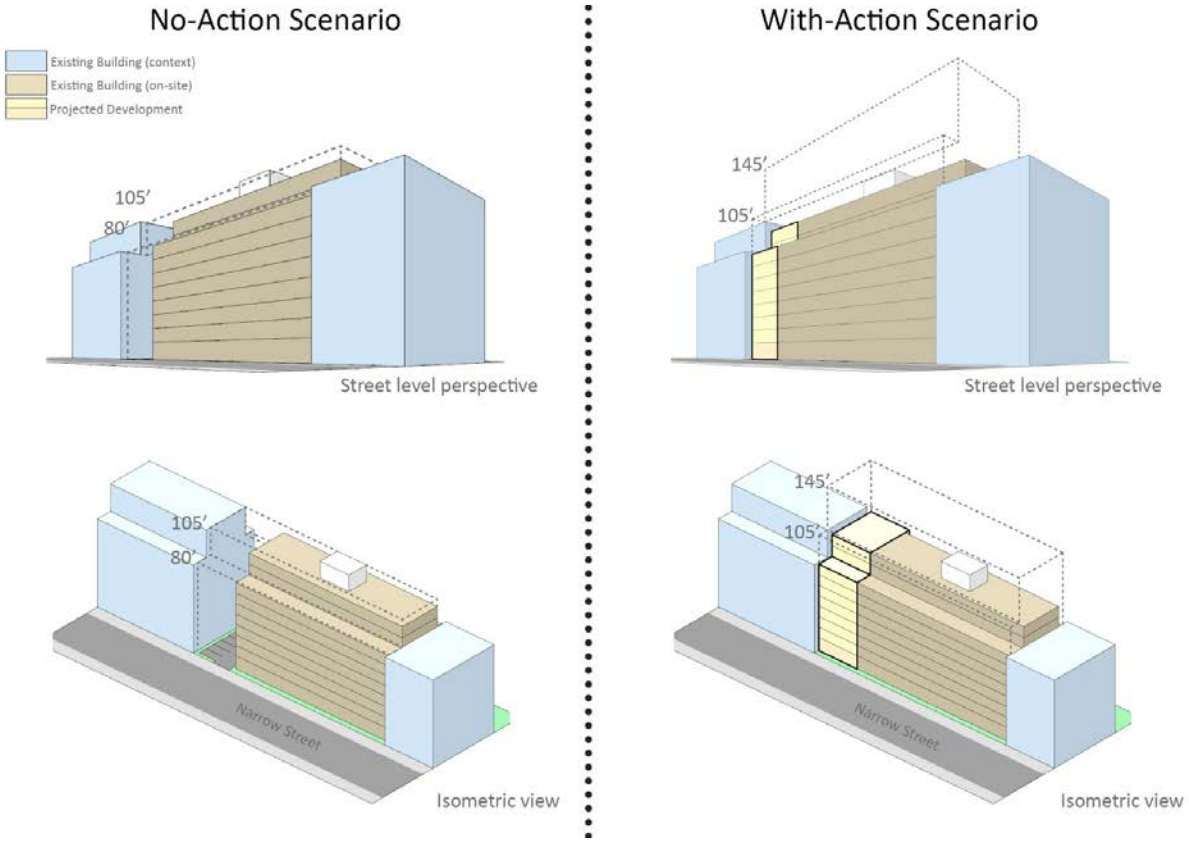
- Eliminate existing and previously required parking for non-profit residences for the elderly or dwelling units for the elderly within the Transit Zone
- Update floor area ratio maximum for Affordable Independent Residences for Seniors

In the No-Action scenario, an existing affordable senior housing development is underbuilt, encompassing only 85,470 out of 120,400 square feet of permitted development rights and developed with 131 residential units. The parking requirement of 10% for Non-Profit Residences for the Elderly in an R8 district added significant cost to the development and the developer was unable to finance structured parking at up to $50,000 per space. As a result, the developer provided surface parking, at the cost of lot area that could have been allocated to additional dwelling units. Fewer than 6 cars are registered to this development, and the majority of the 13 required parking spaces are unused by the residents for whom they were required. The development is located a couple of blocks from a subway station, and is adjacent to multiple public bus routes. The housing development also provides shuttle service to residents and staff, enabling additional mobility among a population that may be limited.

In the With-Action scenario, the Affordable Independent Residences for Seniors in an R8 district has no parking requirement. As conditions of the original regulatory agreement, mortgage provisions, and other restrictions, the property owners seek HUD and HPD approval to modify a partial change in use on the site, in order to expand horizontally over the existing parking lot. Upon approval and upon the securing of public subsidy for the development and tenancy of additional units, the property owner is able to add 44 affordable dwelling units for seniors, creating a total 175 units. Under the With-Action scenario, the development is allowed a FAR of 7.2 and 20 feet of additional height, but neither is utilized to complete the expansion, as the cost to add floors to the existing building would have been prohibitive.

Residents of these 44 additional units may be pulled off of a housing waiting list for income- and age-restricted units. The 6 cars registered to the property would be expected to find on-street parking, or to park in another off-street facility nearby. Additional amenities and community space developed as required by the expanded building area would be provided.

Incremental changes as a result of the with-action scenario include 13 fewer parking spaces, 44 additional affordable senior dwelling units, 28,160 additional gsf, and a modified building footprint.



	No Action	With Action
Lot Area (square feet)	20,000 sq. ft.	20,000 sq. ft.
Permitted FAR	6.02	7.2
Permitted Development Rights (square feet)	120,400 sq. ft.	144,000 sq. ft.
Buildable Floor Area (square feet)	81,400 sq. ft.	103,300 sq. ft.
Number of Units	110	144
Ground Floor / Upper Story Height	12' / 9' -6"	12' / 9 '-6"
Number of Stories/Overall Height	10/100'	10/100'
Number of Parking Spaces	11	0
Remaining FA	39,000 sq. ft.	40,700 sq. ft.
Difference in buildable floor area (percent increase over No Action)		26.9 %
Gross Floor Area (square feet)	85,470 sq. ft.	113,630 sq. ft.
Total number of units (market-rate/affordable)	131 (0/131) units	175 (0/175) units
Number of parking required (market-rate/affordable)	13 (0/13) spaces	0 (0/0) spaces

Prototype 23: R10A District, Long-term Care Facility, 100’ x 100’ interior lot on Wide Street

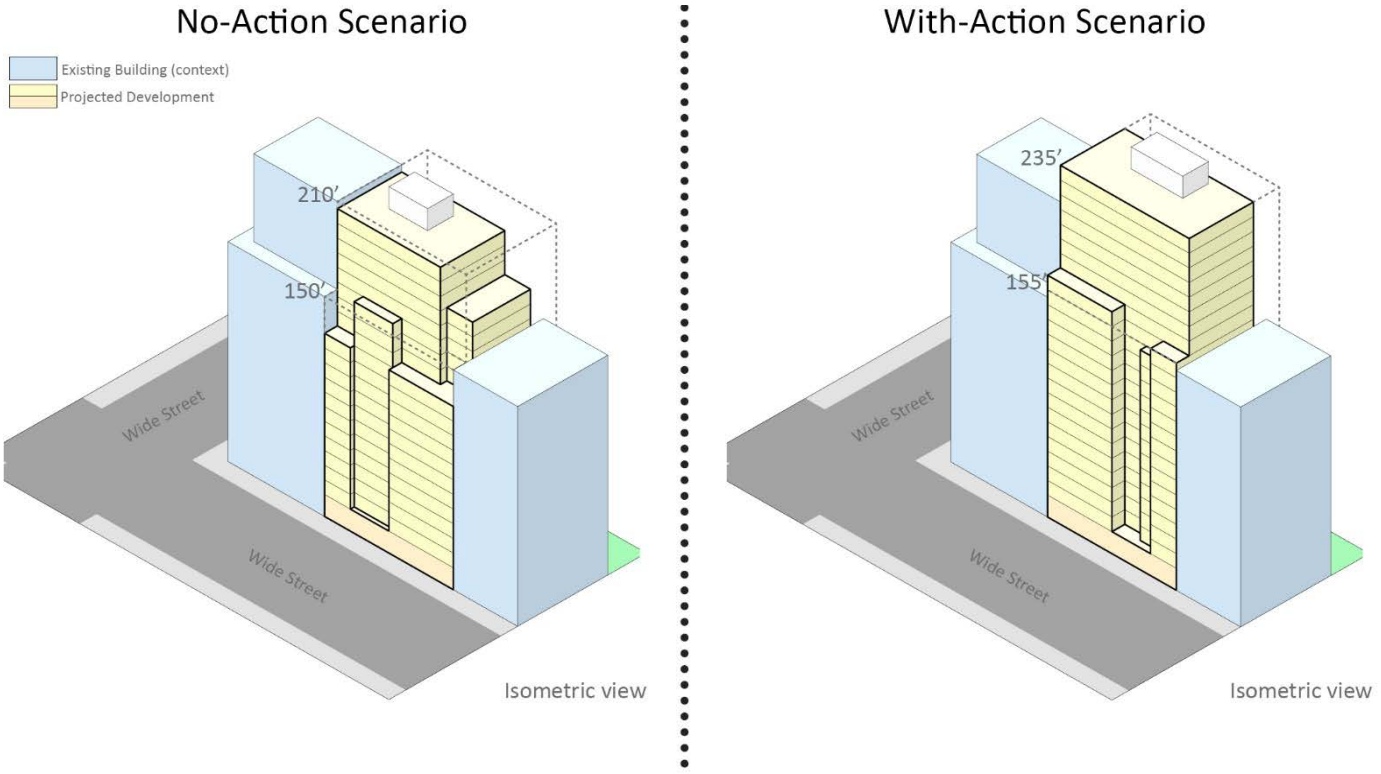
The prototype utilizes a generic 100’ x 100’ interior lot on a wide street in an R10A district, developed as a Long-Term Care facility. The prototype affords the opportunity to understand the effects of the following portions of the Proposed Action, as described in the Project Description, on development:

- Update floor area ratio maximum for Long-Term Care facilities
- Adjust Height Controls for Affordable Independent Residences for Seniors and Long-Term Care Facilities
- Create more-efficient building setback rules
- Provide greater clarity and design opportunities in street wall regulations
- Match street wall line-up provision requirements to intent
- Provide more-useable court regulations
- Encourage elevated residential ground floors

In the No-Action scenario, the building, developed as a Long-Term Care facility, has 10 FAR and 100,000 sq. ft. of gross floor area permitted by the zoning district and a maximum height of 210’. This floor area is accommodated in the existing building envelope, but doing so requires sub-optimal floor to floor heights. The building is 70’ deep and has a base height of 150’ and a total height of 210’. Assuming an average unit size or sq. ft. per bed allocation of 500 sq. ft., the development would be expected to generate 210 beds for Long-Term Care residents. No parking would be required for a facility of this size.

In the With-Action scenario, the building is permitted to build to a maximum FAR of 12, with 120,000 sq. ft. of gross floor area, and the maximum height is increased to 235’. This modified building envelope allows the use of contemporary best practices for residential uses, including floor-to-floor heights, and provides the Long-Term Care facility with the same floor area ratio granted to Affordable Independent Residences for Seniors in this district. The building is 65’ deep and has a maximum base height of 155’ and a total height of 235’, or 23 stories. Assuming an average unit size or sq. ft. per bed allocation of 500 sq. ft., the development would be expected to generate 264 beds for Long-Term Care residents. No parking would be required for a facility of this size.

The With-Action scenario allows an incremental increase of 25 feet, 54 additional beds for Long-Term Care residents, and 27,000 additional gsf. Changes to building design facilitated by the Proposed Action enable the utilization of more efficient construction techniques while resulting in a better pedestrian experience at the sidewalk.



	No Action	With Action
Lot Area (square feet)	**10,000 sq. ft.**	**10,000 sq. ft.**
Permitted FAR	**10.0**	**12.0**
Permitted Development Rights (square feet)	**100,000 sq. ft.**	**120,000 sq. ft.**
Ground Floor / Upper Story Height	**15' / 10'**	**15' / 10'**
Building Depth	**60'**	**60'**
Number of Stories/Overall Height	**20/205'**	**23/235'**
Floor Area that can be accommodated (square feet)	**100,000 sq. ft.**	**120,000 sq. ft.**
Difference in Buildable Floor Area (percent increase over No Action)		**20 %**
Gross Floor Area (square feet)	**105,000 sq. ft.**	**132,000 sq. ft.**
Total number of beds	**210 beds**	**264 beds**
Number of parking required (market-rate/affordable)	**0**	**0**

Prototype 24: R4 District, Affordable Independent Residence for Seniors, 150' x 100' interior lot on narrow street, outside the Transit Zone

The prototype utilizes a generic 150' x 100' interior lot on a narrow street in an R4 district outside the Transit Zone. These assumptions were chosen because of the prevalence of this zoning district throughout the city, and the limited ability to fit the floor area permitted for this use today in an as-of-right manner. The prototype affords the opportunity to understand the effects of the following portions of the proposal on development:

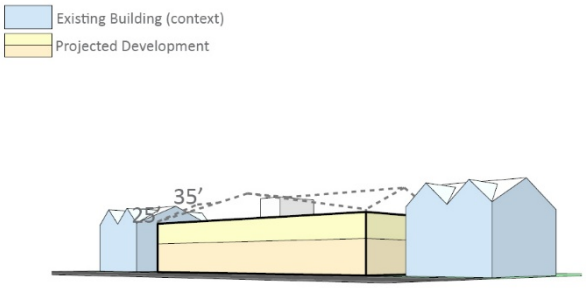
- Create more-efficient building setback rules
- Provide greater clarity and design opportunities in street wall regulations
- Match street wall line-up provision requirements to intent
- Update floor area ratio maximum for Affordable Independent Residences for Seniors
- Create new lower-density bulk envelope for affordable senior housing and Long-Term Care facilities (R3-R5)
- Modernize density factor and unit size requirements for Affordable Independent Residences for Seniors
- Eliminate parking requirements for Affordable Independent Residences for Seniors within the Transit Zone

In the No-Action scenario, the affordable senior housing development is not able to fit the existing floor area permitted for the use in this zoning district even when utilizing sub-optimal building practices including lower floor-to-floor heights. Even with that, nearly half of the permitted floor area cannot be constructed on the site, in a building limited to 25' base height and 35' total height. The development would be permitted to apply for a discretionary approval from the City Planning Commission for a modified building envelope to permit the floor area. The as of right development would include 11,700 square feet, or roughly 19 senior housing units based on contemporary unit sizes of about 650 sq. ft. for this type of housing. There would be a 35 percent parking requirement, resulting in 7 parking spaces, likely exceeding demand based on an analysis of car ownership rates.

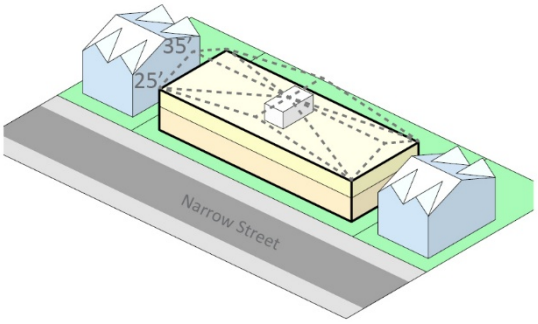
In the With-Action scenario, the affordable senior housing development is able to fit the existing floor area permitted for the use in this zoning district utilizing the enhanced non-contextual envelope controls afforded to buildings providing senior housing in lower-density non-contextual zoning districts. The development is able to utilize best practices for residential buildings for floor to floor heights and is also able to set the building off the property line and provide a variety of building articulation options. The development would not require a discretionary review from the City Planning Commission, allowing as of right building to achieve up to 65' in height (although this scenario is able to fit the floor area with only 45' height). The with-action scenario would facilitate a building that is 19,350 square feet, or roughly 31 senior housing units. Assuming this development occurred far from transit, there would be a 10 percent parking requirement, resulting in 4 parking spaces that closely resemble parking demand based on car ownership rates.

Incremental changes as a result of the with-action scenario include 30' of additional allowable height, 4 fewer parking spaces, 12 additional affordable senior dwelling units, 8,032 additional gsf, and a modified building footprint on the lot. Changes to building design facilitated by the Proposed Action enable the utilization of more efficient construction techniques while resulting in a better pedestrian experience at the sidewalk.

No-Action Scenario

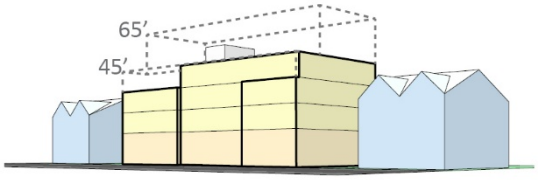


Street level perspective

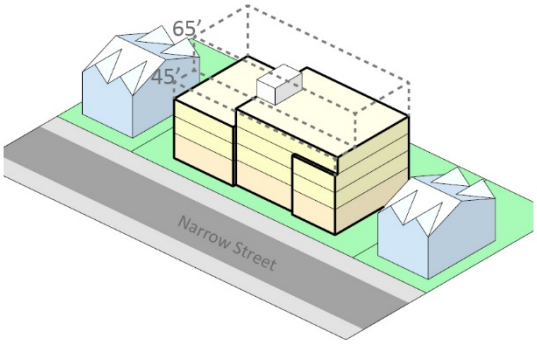


Isometric view

With-Action Scenario



Street level perspective



Isometric view

	No Action	With Action
Lot Area (square feet)	**15,000 sq. ft.**	**15,000 sq. ft.**
Permitted FAR	**1.29**	**1.29**
Permitted Development Rights (square feet)	**19,350 sq. ft.**	**19,350 sq. ft.**
Ground Floor / Upper Story Height	**14' / 10'**	**15' / 10'**
Number of Stories/Overall Height	**2/24'**	**4/45'**
Floor Area that can be accommodated (square feet)	**11,700 sq. ft.**	**19,350 sq. ft.**
Remaining Floor Area (square feet)	**7,650 sq. ft.**	**0 sq. ft.**
Difference in Buildable Floor Area (percent increase over No Action)		**39.5 %**
Gross Floor Area (square feet)	**12,285 sq. ft.**	**20,317 sq. ft.**
Total number of units (market-rate/affordable)	**19 (0/19) units**	**31 (0/31) units**
Number of parking required (market-rate/affordable)	**7 (0/7) spaces**	**3 (0/3) spaces**

Prototype 25: R5 District, Affordable Independent Residences for Seniors, 150' x 100' interior lot on narrow street

The prototype utilizes a generic 150' x 100' interior lot on a narrow street in an R5 district. These assumptions were chosen because of the prevalence of this zoning district throughout the city, and the limited ability to fit the floor area permitted for this use today in an as-of-right manner. The prototype affords the opportunity to understand the effects of the following portions of the proposal on development:

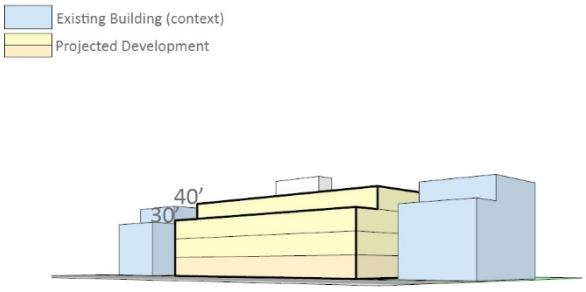
- Create more-efficient building setback rules
- Provide greater clarity and design opportunities in street wall regulations
- Match street wall line-up provision requirements to intent
- Update floor area ratio maximum for Affordable Independent Residences for Seniors
- Create new lower-density bulk envelope for affordable senior housing and Long-Term Care facilities (R3-R5)
- Modernize density factor and unit size requirements for Affordable Independent Residences for Seniors and Long-Term Care facilities
- Eliminate parking requirements for Affordable Independent Residences for Seniors within the Transit Zone

In the No-Action scenario, the affordable senior housing development is not able to fit the existing floor area permitted for the use in this zoning district even when utilizing sub-optimal building practices including lower floor-to-floor heights. Even with that, nearly half of the permitted floor area cannot be constructed on the site, in a building limited to 30' base height and 40' total height. The development would be permitted to apply for a discretionary approval from the City Planning Commission for a modified building envelope to permit the floor area. The as of right development would include 29,176 square feet. The dwelling unit factor for senior housing in an R5 District is 700, which limits this development's ability to provide smaller units per contemporary building practices. As a result, only 42 senior housing units would be permitted on the lot. There would be a 31.5 percent parking requirement, resulting in 13 parking spaces, likely exceeding demand based on an analysis of car ownership rates.

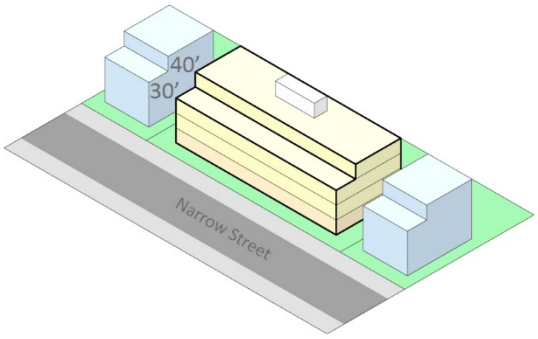
In the With-Action scenario, the affordable senior housing development is able to fit the existing floor area permitted for the use in this zoning district utilizing the enhanced non-contextual envelope controls afforded to buildings providing senior housing in lower-density non-contextual zoning districts. The development is able to utilize best practices for residential buildings for floor to floor heights and is also able to set the building off the property line and provide a variety of building articulation options. The development would not require a discretionary review from the City Planning Commission, allowing as of right building to achieve up to 65' in height. The with-action scenario would facilitate a building that is 29,250 square feet, or roughly 47 senior housing units. No parking spaces would be required for this development occurring within the Transit Zone.

Incremental changes as a result of the with-action scenario include 30' of additional allowable height, 13 fewer parking spaces, 5 additional affordable senior dwelling units, and 1,536 additional gsf. Changes to building design facilitated by the Proposed Action enable the utilization of more efficient construction techniques while resulting in a better pedestrian experience at the sidewalk.

No-Action Scenario

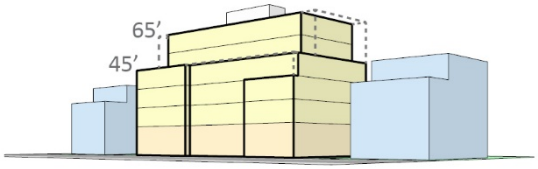


Street level perspective

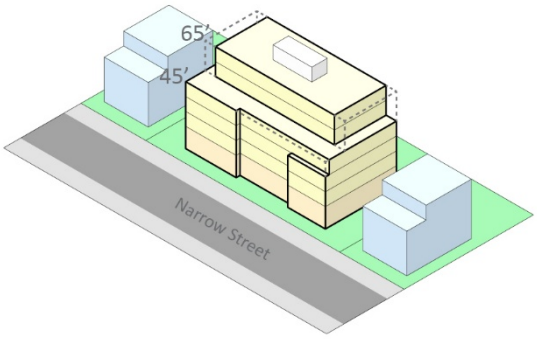


Isometric view

With-Action Scenario



Street level perspective



Isometric view

	No Action	With Action
Lot Area (square feet)	**15,000 sq. ft.**	**15,000 sq. ft.**
Permitted FAR	**1.95**	**1.95**
Permitted Development Rights (square feet)	**29,250 sq. ft.**	**29,250 sq. ft.**
Ground Floor / Upper Story Height	**10' / 10'**	**15' / 10'**
Building Depth	**55'**	**55'**
Number of Stories/Overall Height	**4/40'**	**6/65'**
Floor Area that can be accommodated (square feet)	**27,787 sq. ft.**	**29,250 sq. ft.**
Remaining Floor Area (square feet)	**1,463 sq. ft.**	**0 sq. ft.**
Difference in Buildable Floor Area (percent increase over No Action)		**5.0 %**
Gross Floor Area (square feet)	**29,176 sq. ft.**	**30,712 sq. ft.**
Total number of units (market-rate/affordable)	**42 (0/42) units**	**47 (0/47)**
Number of parking required (market-rate/affordable)	**13 (0/13) spaces**	**0 (0/0) spaces**

Prototype 26: R5 District, Long-term Care Facility and Affordable Independent Residences for Seniors, 200'x200' corner lot on wide and narrow streets, outside of Transit Zone

The prototype utilizes a generic 200' x 200' through corner lot on wide and narrow streets in an R5 district, outside the Transit Zone. These assumptions were chosen because of the prevalence of this zoning district throughout the city, and the limited ability to fit the floor area permitted for this use today in an as-of-right manner. The prototype affords the opportunity to understand the effects of the following portions of the proposal on development:

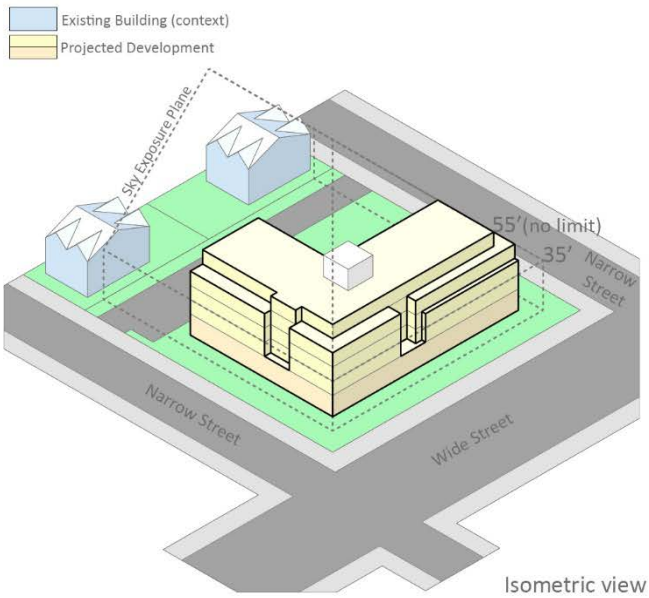
- Create more-efficient building setback rules
- Provide greater clarity and design opportunities in street wall regulations
- Match street wall line-up provision requirements to intent
- Update floor area ratio maximum for Long-Term Care facilities
- Create new lower-density bulk envelope for affordable senior housing and Long-Term Care facilities (R3-R5)
- Remove dwelling unit controls for Affordable Independent Residences for Seniors and certain UG2 Long-Term Care Facilities
- Provide a framework for mixing of Use Group 2 residences with certain Use Group 3 community facilities

In the No-Action scenario, the Long-Term Care facility has 1.27 FAR and 50,800 sq. ft. of permitted development rights. In a non-contextual district, the building is subject to sky exposure plane regulations with minimal flexibility as-of-right, and is constructed to a height of 35'. The development can accommodate 107 beds for Long-Term Care, which require 11 parking spaces at a ratio of 1 space per 10 beds.

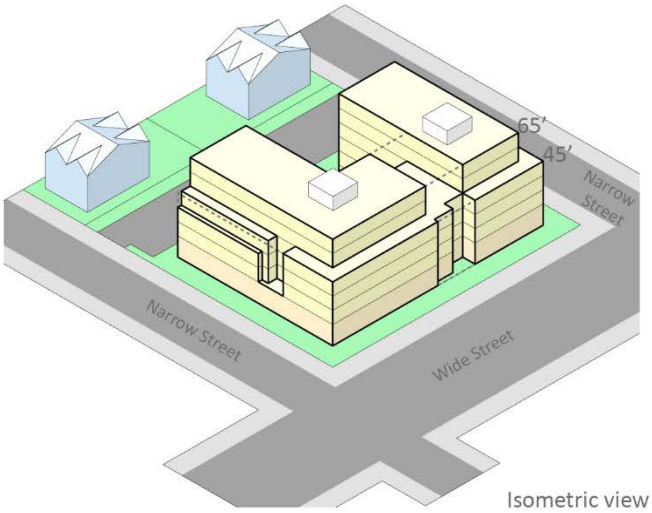
In the With-Action scenario, a building with Long-Term Care a combination of AIRS and Long-Term Care has 1.95 FAR and 78,000 sq. ft., as well as new non-contextual envelope controls afforded to buildings providing Long-Term Care in lower-density non-contextual zoning districts. In this scenario, the developer chooses to mix Affordable Independent Residences for Seniors with Long-Term Care uses, reflecting contemporary building and programming practices. Assuming a ratio of 500 sq. ft. per LTC bed, and 650 square feet per AIRS unit, the facility can accommodate 107 beds for Long-Term Care residents and 50 affordable units for seniors. Long-Term Care facilities, or nursing homes, have a parking requirement of one space 10 beds, and 11 parking spaces are required for this use; the portion of the development allocated for AIRS requires 5 parking spaces outside of the Transit Zone, resulting in a total 16 parking spaces under the With-Action scenario.

Incremental changes as a result of the with-action scenario include 32,460 additional gross square footage, one additional story of height, 50 additional units of Affordable Independent Residences for Seniors, and 5 additional parking spaces. Changes to building design facilitated by the Proposed Action enable the utilization of more efficient construction techniques while resulting in a better pedestrian experience at the sidewalk.

No-Action Scenario



With-Action Scenario



	No Action	With Action
Lot Area (square feet)	40,000 sq. ft.	40,000 sq. ft.
Permitted FAR	1.27	1.95
Permitted Development Rights (square feet)	50,800 sq. ft.	78,000 sq. ft.
Ground Floor / Upper Story Height	15' / 10'	15' / 10'
Number of Stories/Overall Height	5/55'	6/65'
Floor Area that can be accommodated (square feet)	50,800 sq. ft.	78,000 sq. ft.
Difference in Buildable Floor Area (percent increase over No Action)		53.5 %
Gross Floor Area of Long-term Care Facility (square feet)	53,340 sq. ft.	53,340 sq. ft.
Gross Floor Area of Affordable Independent Residences for Seniors (square feet)	0 sq. ft.	32,460 sq. ft.
Total number of Long-term Care Facility Beds	107 beds	107 beds
Total number of Affordable Independent Residences for Seniors Units	0	50 units
Number of parking required	11 spaces	16 spaces

Prototype 27: R4 District, Affordable Independent Residences for Seniors, 200'x200' steeply-sloping corner lot on wide and narrow streets, outside the Transit Zone

The prototype utilizes a generic 200' x 200' through corner lot on wide and narrow streets in an R4 district. About one third of the lot is on a steep slope, making it harder and more costly for this type of budget-constrained housing development. These assumptions were chosen because of the prevalence of this zoning district throughout the city, and the limited ability to fit the floor area permitted for this use today in an as-of-right manner. The prototype affords the opportunity to understand the effects of the following portions of the proposal on development:

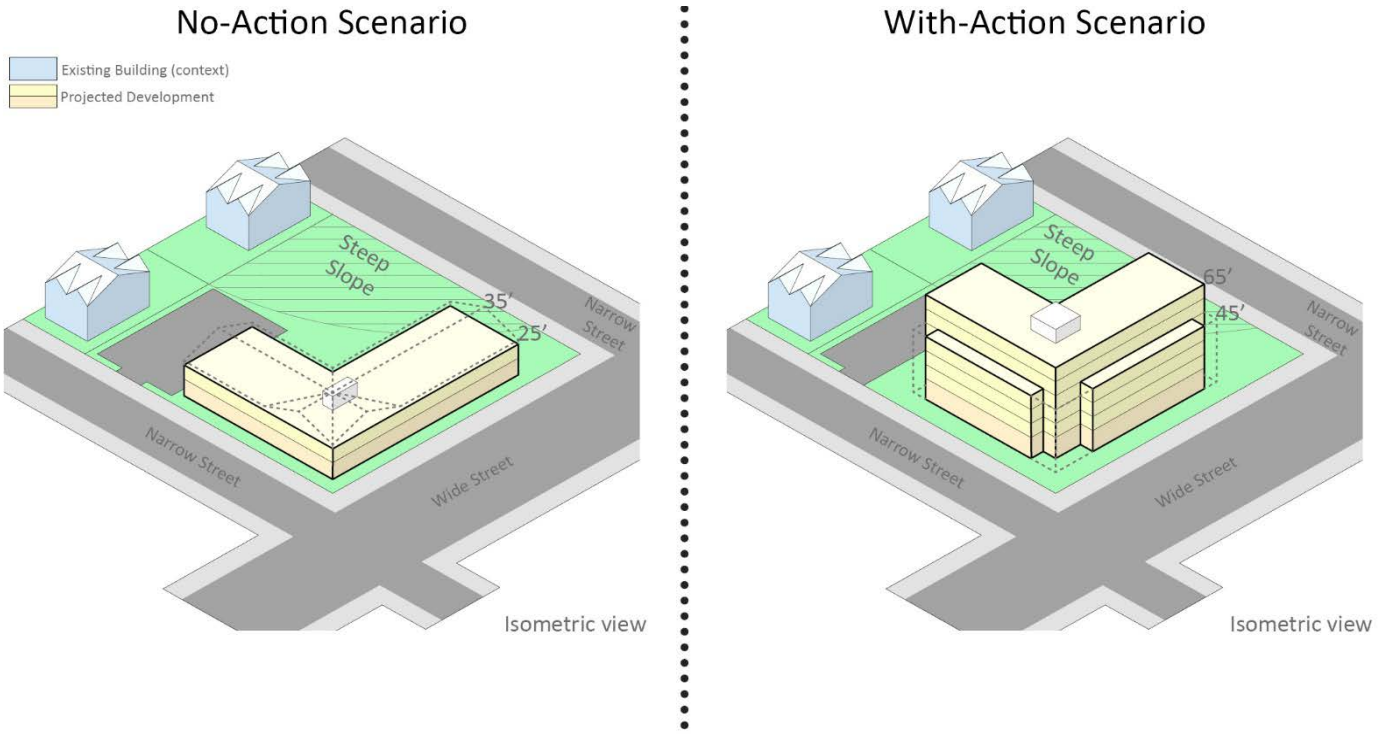
- Update floor area ratio maximum for Affordable Independent Residences for Seniors
- Create new lower-density bulk envelope for affordable senior housing and Long-Term Care facilities (R3-R5)
- Modernize density factor and unit size requirements for Affordable Independent Residences for Seniors and Long-Term Care facilities
- Provide additional flexibility for irregular topography
- Reduce parking requirements for Affordable Independent Residences for Seniors outside the Transit Zone

In the No-Action scenario, the affordable senior housing development is not able to fit the existing floor area permitted for the use in this zoning district even when utilizing sub-optimal building practices including lower floor-to-floor heights. Assuming sub-optimal building practices, nearly half of the permitted floor area cannot be constructed on the site when limited to 25' perimeter wall height and 35' total height. The as of right development would include 22,450 square feet, or roughly 36 senior housing units based on contemporary unit sizes of about 650 gross sq. ft. for this type of housing. There would be a 35 percent parking requirement, resulting in 13 parking spaces, likely exceeding demand based on an analysis of car ownership rates.

In the No-Action scenario, the development would be permitted to apply for a discretionary approval from the City Planning Commission for a modified building envelope to permit the floor area. A City Planning Commission authorization is available in R3-2, R4 and R5 districts (other than R4A, R4B, R4-1, R5A, R5B and R5D districts) to modify the height and setback regulations for non-profit residences for the elderly, provided that the neighborhood character is not impaired by the additional height. This authorization has been utilized frequently, as the sloping envelopes of most lower-density districts limit the ability of the envelope to cost-effectively accommodate the permitted floor area. The requirement for the authorization represents a bureaucratic hurdle that limits the ability to produce Affordable Independent Residences for Seniors in these districts.

In the With-Action scenario, the affordable senior housing development is able to fit the existing floor area permitted for the use in this zoning district utilizing the proposed non-contextual envelope controls afforded to buildings providing senior housing in lower-density non-contextual zoning districts. The development is able to comply with development guidelines and requirements for senior housing development for floor to floor heights and is also able to set the building off the property line and provide a variety of building articulation options. The development would not require a discretionary review from the City Planning Commission, allowing as of right building to achieve up to 65' in height. The with-action scenario would facilitate a building that is 51,600 square feet, or roughly 81 senior housing units. Assuming this development occurred outside of the Transit Zone, there would be a 10 percent parking requirement, resulting in 9 parking spaces that closely align with parking demand based on car ownership rates.

Incremental changes as a result of the with-action scenario include 30' of additional allowable height, 4 fewer parking spaces, 51 additional affordable senior dwelling units, 33,110 additional gsf, and a modified building footprint on the lot. Changes to building design facilitated by the Proposed Action enable the utilization of more efficient construction techniques while resulting in a better pedestrian experience at the sidewalk.



	No Action	With Action
Lot Area (square feet)	**40,000 sq. ft.**	**40,000 sq. ft.**
Permitted FAR	**1.29**	**1.29**
Permitted Development Rights (square feet)	**51,600 sq. ft.**	**51,600 sq. ft.**
Ground Floor / Upper Story Height	**12' / 10'**	**15' / 10'**
Number of Stories/Overall Height	**2/22'**	**6/65'**
Floor Area that can be accommodated (square feet)	**22,450 sq. ft.**	**51,600 sq. ft.**
Difference in Buildable Floor Area (percent increase over No Action)		**129.8 %**
Gross Floor Area of Affordable Independent Residences for Seniors (square feet)	**23,650 sq. ft.**	**56,760 s. ft.**
Total number of Affordable Independent Residences for Seniors Units	**36 units**	**87 units**
Number of parking required	**13 spaces**	**9 spaces**