

3. LAND USE, ZONING, AND PUBLIC POLICY

3.1. INTRODUCTION

Under the 2014 City Environmental Quality Review (CEQR) Technical Manual guidelines, a land use analysis evaluates the uses and development trends in the area that may be affected by a Proposed Action and determines whether the Proposed Action is compatible with those conditions or may negatively impact them. Similarly, the analysis considers the Proposed Action's compliance with, and effect on, the area's zoning and other applicable public policies. Even when there is little potential for an action to be inconsistent with land use or zoning, a description of these issues is generally provided to establish conditions and provide information needed in other technical areas of the CEQR review. The land use analysis characterizes the uses and development trends in the area directly affected by the Proposed Action. Similarly, a zoning analysis considers an action's effect on zoning in the area directly affected by the Proposed Action.

A description of the existing zoning regulations and the proposed changes to them is presented in the Project Description, and the likely effects of the proposed changes on future development are described in detail in the analysis framework. The Department of City Planning proposes a citywide zoning text amendment to introduce a Special Permit under the jurisdiction of the City Planning Commission (CPC) for all new self-storage development in Designated Areas in M districts. A Special Permit is a discretionary action by the City Planning Commission, subject to the public review process (ULURP), which may modify use regulations if certain conditions specified in the Zoning Resolution are met. The public review process includes Community Board, Borough President and City Planning Commission review. The City Council may also elect to review a Special Permit application and Mayoral review is also optional.

By introducing a CPC Special Permit, the Department of City Planning proposes a case-by-case, site-specific review process to ensure that the development of self-storage does not diminish future siting opportunities for industrial businesses by occupying sites that would be optimal for such businesses. Such a case-by-case evaluation is considered appropriate, since not all sites in Designated Areas in M Districts are appropriate for industrial businesses, and it is recognized that under certain circumstances, a self-storage facility may represent an improvement to an industrial area or render a service to its residents and businesses.

Self-storage facilities are classified in zoning as Use Group 16D, either as warehouses or moving and storage offices, and are permitted as-of right in all M districts and C8 districts. With the enactment of this proposal, self-storage will remain in Use Group 16D, but will be specifically defined in the *Zoning Resolution*. A CPC Special Permit would be required for the defined use in Designated Areas in M Districts, which cover a portion of M districts and represent the heart of NYC's industrial activity.

The findings of the proposed Special Permit will require the City Planning Commission to evaluate whether a lot or building would be optimal for conforming, modern-day industrial uses, based on a set of criteria. Graphics showing the areas of the City that would be affected by the Proposed Action are presented in the Appendix B.

The following land use, zoning and public policy assessment provides a general description of the zoning districts affected by the Proposed Action and the predominant land use patterns within those zoning districts. Also, a description of any recent, relevant zoning actions and public policies that apply to the Proposed Action is provided. Following this description, the potential for the Proposed Action to result in impacts to land use, zoning and public policy is assessed.

3.2. PRINCIPAL CONCLUSIONS

No significant adverse impacts on land use, zoning, or public policy are anticipated in the future with the Proposed Action. The Proposed Action would not directly displace any land uses in any of the affected zoning districts so as to adversely affect surrounding land uses, nor would it generate land uses that would be incompatible with land uses, zoning, or public policy. As the Proposed Action would not change the underlying zoning and permitted uses, it would not create land uses or structures that would be incompatible with the underlying zoning or conflict with public policies applicable to the affected districts or surrounding neighborhoods.

3.3. EXISTING CONDITIONS

3.3.1. Existing Land Use

The Proposed Action would affect large portions of the city. Consequentially, land Use will be explored in terms of Designated Areas in M Districts and Land Use in Non-Designated Areas in C8 and M districts.

3.3.1.1. Designated Areas in M Districts

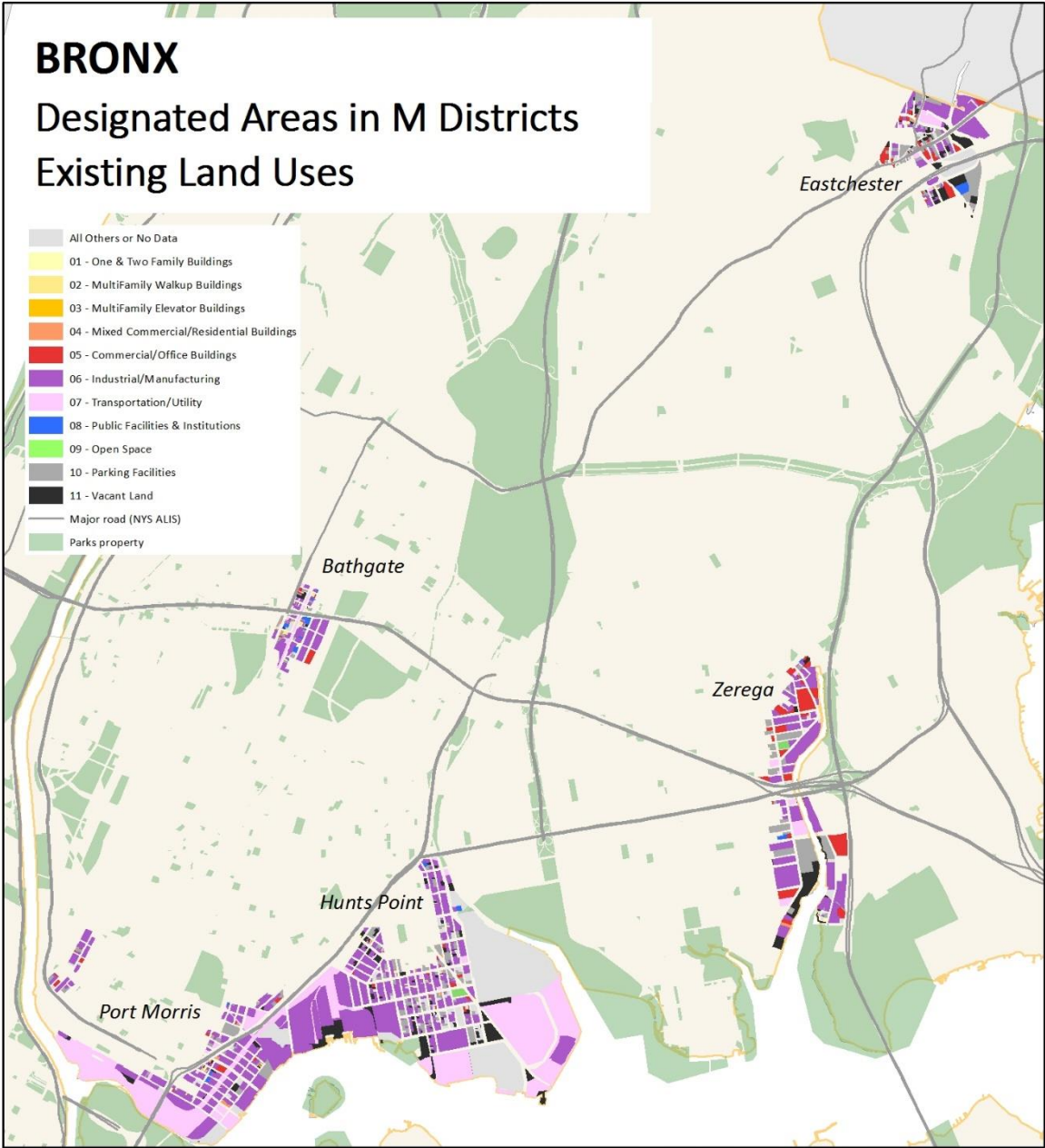
New York City currently has 21 Industrial Business Zones (IBZs). IBZs function as key industrial areas that accommodate and encourage a range of industrial jobs and activities (NYC Office of the Mayor, 2005). They are composed only of M1, M2 and M3 districts, which allow industrial and manufacturing uses, most commercial uses and some community facility uses. New residential development is not allowed within the IBZs. Many of the businesses in IBZs generate truck traffic, noise, odors or emissions, require relatively large sites and are incompatible with residential and high density commercial or community facility development.

Land uses within the Designated Areas in M Districts are predominantly industrial and utilities or transportation-based, as illustrated by Figure 1 and the land use maps (see Figure 2, Figure 3, Figure 4, Figure 5; industrial land uses are illustrated in purple, utilities/transportation are in pink). Over 60 percent of all lot area in the Designated Areas in M Districts is classified as industrial/manufacturing or utilities/transportation. A high percentage of the land is also classified as vacant (16%), which is principally due to a few very large lots on Staten Island that have not been developed.

OVERVIEW OF LAND USES IN DESIGNATED AREAS IN M DISTRICTS	ACRES	PERCENT
INDUSTRIAL/MANUFACTURING BUILDINGS	3213.8	41.04%
TRANSPORTATION/UTILITIES	1607.4	20.53%
VACANT LAND	1287.4	16.44%
PARKING FACILITIES	486.1	6.21%
NO DATA	442.6	5.65%
COMMERCIAL/OFFICE BUILDINGS	297.3	3.80%
PUBLIC FACILITIES AND INSTITUTIONS	210.5	2.69%
OPEN SPACE	204.9	2.62%
RESIDENTIAL BUILDINGS	59.0	0.75%
MIXED COMMERCIAL/RESIDENTIAL BUILDINGS	21.4	0.27%

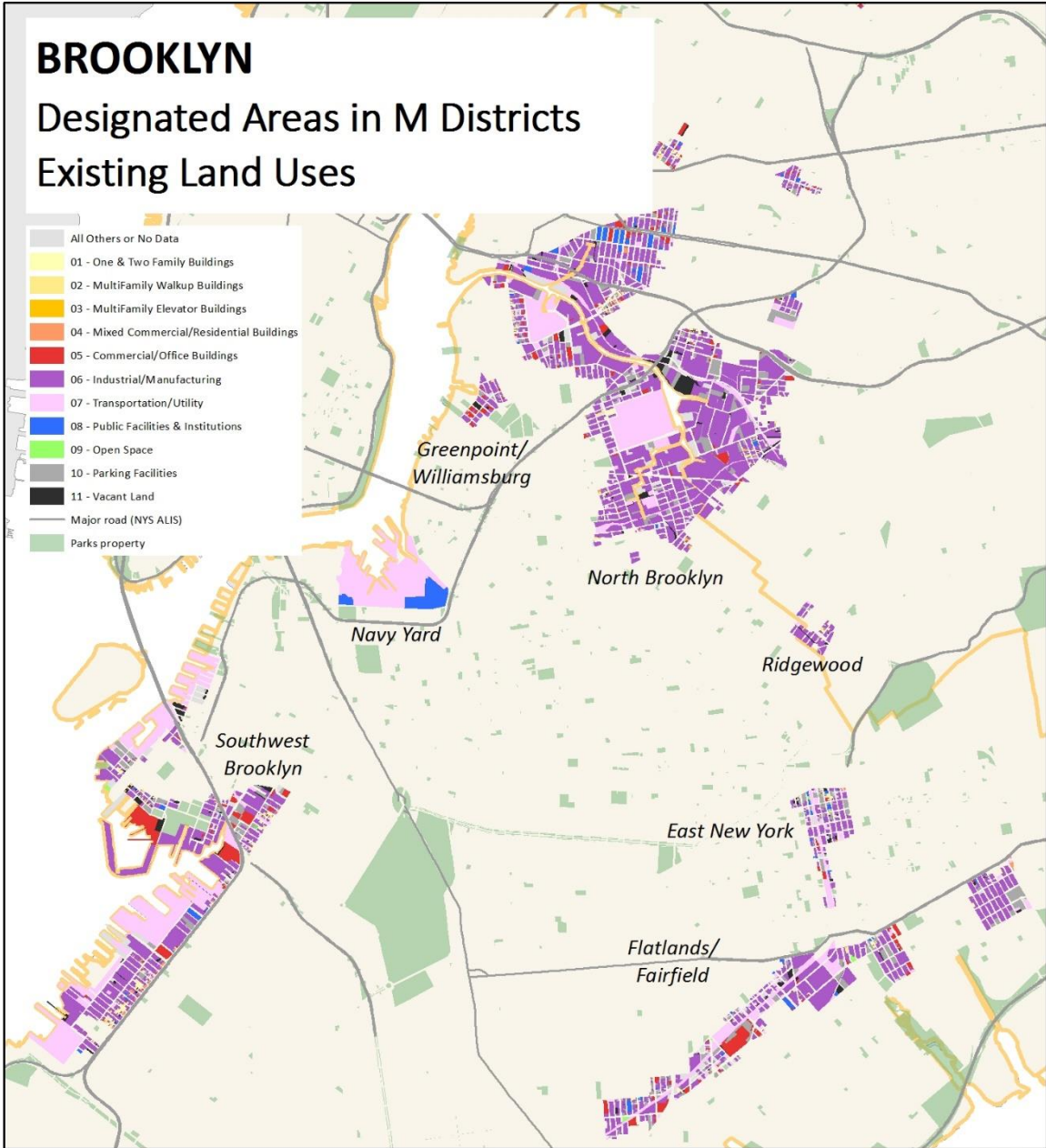
FIGURE 1

SOURCE: NYC DCP PLUTO 16V1



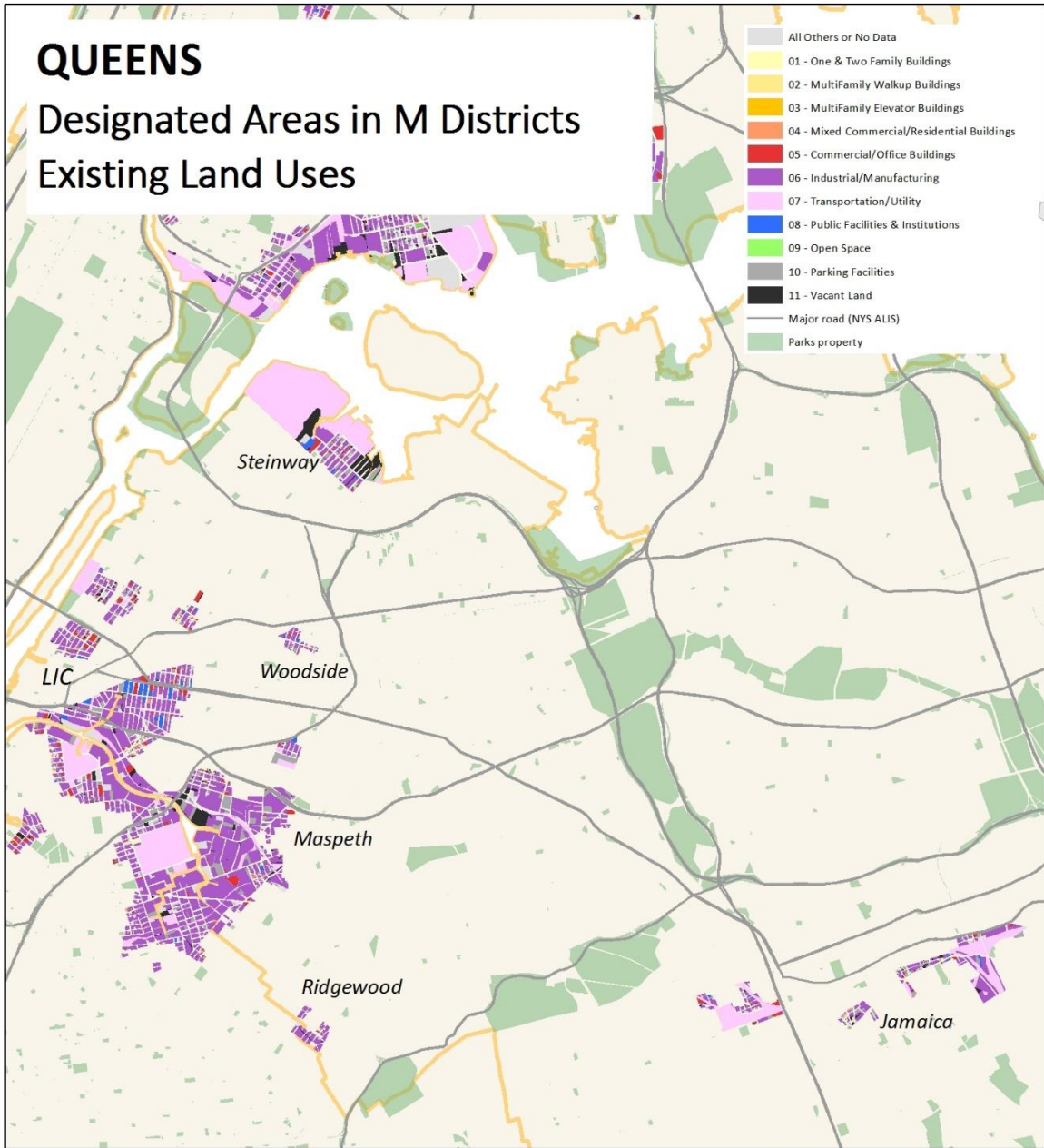
NYC Department of City Planning, PLUTO 16v1

Figure 2



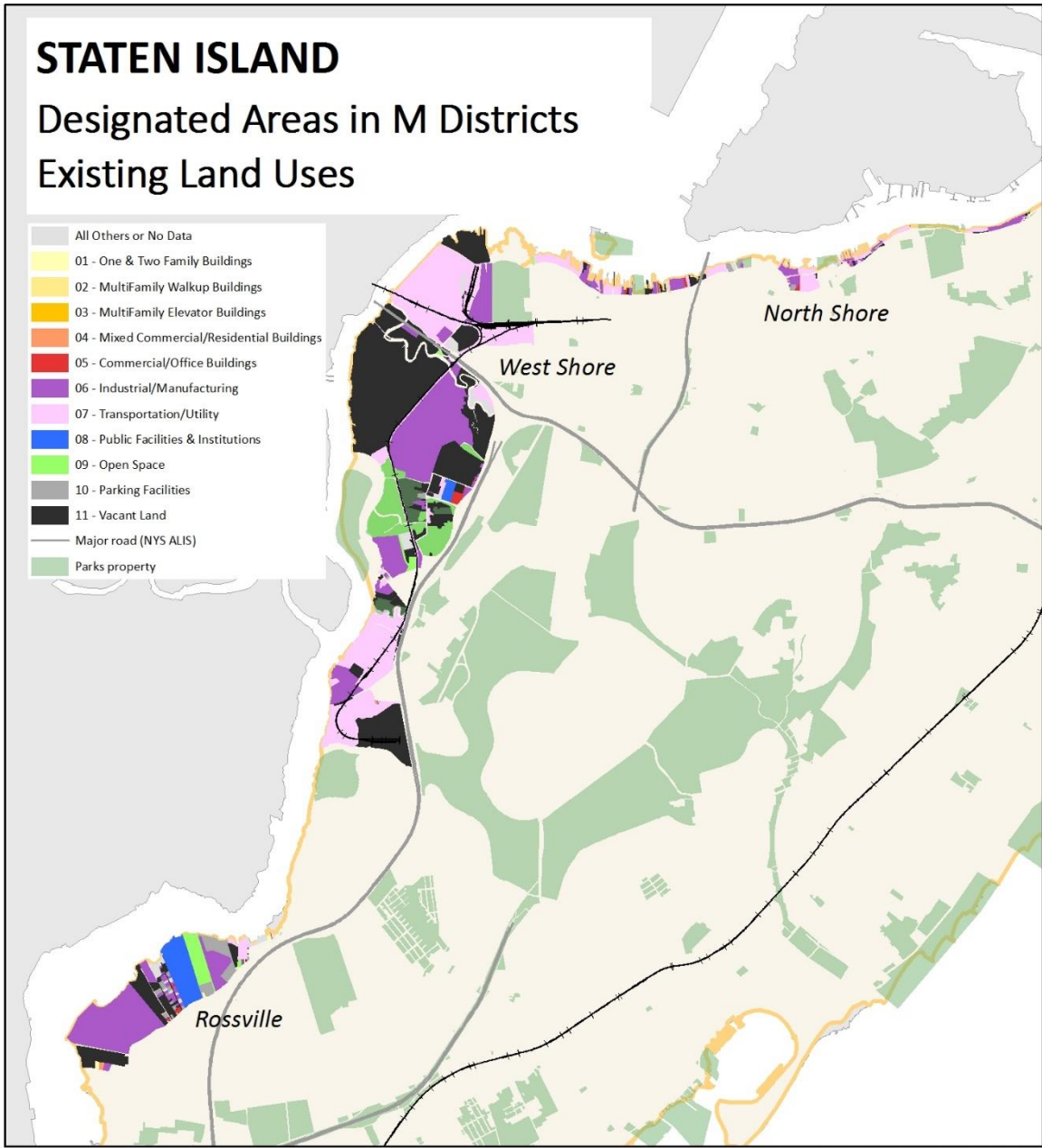
NYC Department of City Planning, PLUTO 16v1

Figure 3



NYC Department of City Planning, PLUTO 16v1

Figure 4



NYC Department of City Planning, PLUTO 16v1

Figure 5

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

3.3.1.1.1. Recent Development Trends in Designated Areas

An analysis was completed of New Building Permits issued by the Department of Buildings. Building permits were reviewed for new construction in Designated Areas in M Districts between 2010 and the end of 2016. This time period was estimated to be representative of the kind of development that could reasonably be expected in the near future in the Designated Areas in M Districts. While self-storage development conflicts with the City's economic development goals for Industrial Business Zones for a number of reasons, one reason is that self-storage tends to occupy very large sites in these areas, without providing many employment opportunities. The Proposed Action specifically intends to promote the availability of large lots near truck routes for industrial, more job-intensive businesses.

Accordingly, it is important to understand in detail the type of new development in IBZs that has occurred on large sites, defined as sites larger than 20,000 sq. ft. Recent development on sites larger than 20,000 sq. ft. is considered to be representative of the uses and businesses that could have sited in the locations where self-storage facility was developed, and are considered lost opportunities. Similarly, past development on large sites illustrates the universe of potential development on such sites in the absence of self-storage in the Future With-Action Condition.

The analysis shows that a total of 121 new building permits were issued for developments in IBZs in the seven-year period from 2010 until 2016. 44 of these permits were for developments occurring on lots larger than 20,000 sq. ft., and ten, or 23 percent, of these 44 new developments were self-storage facilities. Figure 6 depicts the non-self-storage uses (no=34) that occurred in these newly developed buildings on lots larger than 40,000 sq. ft. (no= 19) and lots between 20,000 and 40,000 sq. ft. (no=15) in IBZs since 2010:

New Developments on large Lots (>40,000 sq. ft.)		
Industrial (13)	Non-Industrial (6)	Self-storage (6)
3 auto or fleet vehicle repair/maintenance facilities	2 retail	6 facilities
2 courier service facilities	1 hotel	
1 printing and distribution facility	1 elementary school	
1 food manufacturing and distribution facility	1 residential building	
1 miscellaneous warehouse	1 office	
1 concrete manufacturing batch plant		
1 trucking terminal		
1 construction contractor		
1 film recording studio		
1 utilities		
New Developments on small Lots (> 20,000 and <40,000 sq. ft.)		
Industrial (9)	Non-Industrial (6)	Self-storage (4)
3 food/wholesale and distribution facilities	2 hotels	4 facilities
2 miscellaneous warehouses	1 retail	
1 construction contractor	1 office	
1 trucking terminal	1 car rental/car wash	
1 plastic fabricator	1 medical care office	
1 steel fabricator		

Figure 6
DOB Building Permits and DCP research, April 2017

The recent developments on large lots in Designated Areas since 2010 (see Figure 6) show that while industrial uses represent the majority of permits for new construction, development has covered a wide spectrum and a variety of uses and businesses, even in NYC’s most active industrial areas. The industrial uses include vehicle repair, wholesale and distribution, courier services, construction-related uses and the manufacturing of concrete, plastic and steel, but also new utility facilities and a film recording studio, which is an emerging industry in NYC. New non-industrial developments have been hotels, retail, offices, which are for the most part permitted by zoning regulations, but also a school and a residential development.

3.3.1.1.2. Likely self-storage development sites in Designated Areas

In order to determine how the proposal might affect development and land use conditions in Designated Areas, this DEIS describes the existing land use and employment conditions on sites most typical of recent self-storage development within the Designated Areas in M Districts. A database regarding self-storage facilities in New York City, compiled by the Department of City Planning, shows that new construction self-

storage facilities built post-2000 in Designated Areas in M Districts were sited on lots ranging from 10,000 sq. ft. to 87,000 sq. ft., although only a few examples of self-storage facilities on lots smaller than 20,000 sq. ft. exist. The median lot size was 40,000 sq. ft. The majority of these sites were also located along designated truck routes.

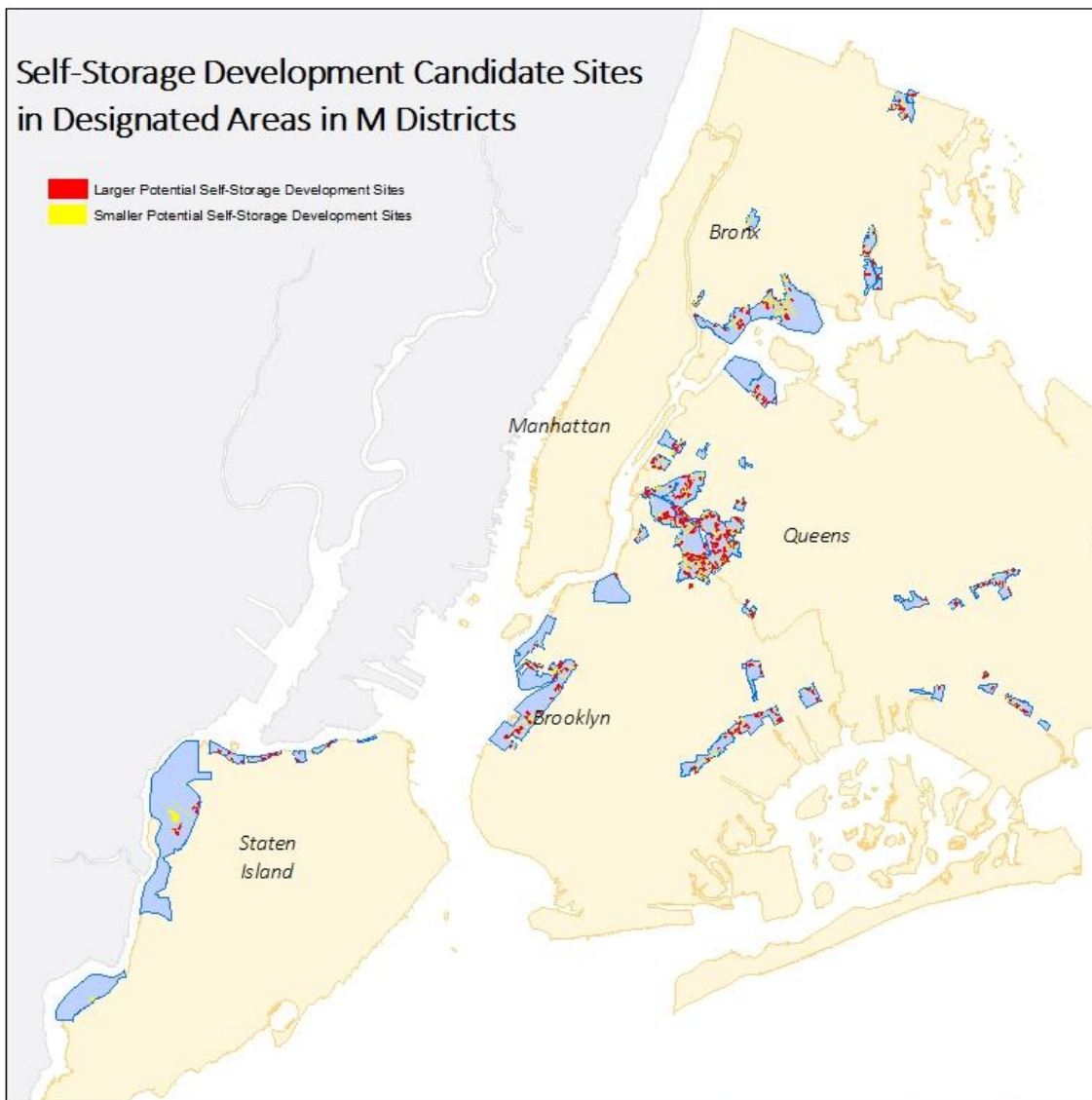
In order to identify the sites most likely to be developed with self-storage, the analysis distinguishes between “large sites” above the median (40,000 to 90,000 sq. ft.) and “smaller sites” below the median (10,000 to 40,000 sq. ft.). Although sites as small as 10,000 sq. ft. represent outliers, and self-storage development sites are typically larger than 20,000 represent outliers, since sites as small as 20,000 sq. ft. were taken into account for this analysis, because lot assemblages may always occur). A selection of tax lots within these two categories of sites (smaller and large) in Designated Areas and within 500 feet of a designated truck were analyzed. Locations of existing or planned self-storage facilities came from NYCDCP’s inventory, and the following categories of sites were excluded from the analysis, based on Department of Finance classifications in the PLUTO 2016 v2 dataset:

- Ownership classification as publicly-owned or tax-exempt;
- Utilities and transportation infrastructure;
- Schools;
- Government installations;
- Sites that have been developed with new buildings within the last 10 years;
- Sites with existing permits for new buildings;
- Hotels;
- Sites with residential buildings;
- Hospitals;
- Asylums and homes;
- Houses of worship;
- Public facilities and institutions;
- Parks, playgrounds and outdoor recreation facilities; and
- Existing or planned self-storage facilities.

The analysis distinguishes between “soft” sites for redevelopment- tax lots built to less than half of the currently permitted commercial floor area ratio (FAR); and conversion candidates- tax lots built to more than half of the currently permitted commercial FAR. A summary of the distribution of sites between large and small and conversion and new construction candidates is provided in Figure 8. Detailed building and land use characteristics for small and large potential development sites are provided below in Figure 9 and Figure 10. Recent employment characteristics by these site categories are provided in Figure 11 and Figure 12.

As shown in Figure 8, almost 1,800 tax lots within Designated Areas are potential candidates for self-storage development based on recent trends. Although existing sites suitable for future redevelopment for self-storage are concentrated among the smaller sites, recent self-storage developments are evenly distributed across large and small sites (the median lot area of post-2000 construction is 40,000 sq. ft.), indicating that self-storage locates disproportionately on larger sites relative to the potential universe of sites available;

50 percent of new facilities sites on larger sites, which make up only about 19 percent of the current universe of likely development sites in Designated Areas. The 1,767 sites identified as potential candidates for redevelopment are distributed widely throughout the Designated Areas (see the map in Figure 8).



NYC Dept. of City Planning April 2017

Figure 7: Potential Candidate Self-Storage Development Sites in Designated areas

	Conversion (built FAR>half of permitted FAR)		New Construction (built FAR<half of permitted FAR)		Total	
	Number	% of all sites	Number	% of all sites	Number	% of all sites
Larger sites (40,000 to 90,000 SQ. FT.)	130	7.3%	209	11.8%	339	19%
Smaller sites (10,000 to 40,000 SQ. FT.)	679	38.4%	749	42.4%	1,428	81%
Total	809	45.8%	958	54.2%	1,767	100%

Figure 8: Self-storage candidate development sites in Designated Areas

Figure 9

Select land use and building characteristics on sites 40,000-90,000 sq. ft. in Designated Areas and with 500 feet of a designated truck route

Number of floors and land use	Total tax lots	Average lot area	Median year built	Average Built FAR
Conversion Candidates	130	59,126		1.39
0-2 Stories	101	57,931		1.03
Commercial and Office Buildings	3	55,772	1983	0.65
Industrial & Manufacturing	91	58,188	1959	1.05
Parking	7	55,508	1936	0.83
3 or more stories	29	63,287		2.65
Commercial & Office Buildings	3	52,248	1931	3.50
Industrial & Manufacturing	26	64,561	1930	2.55
Soft Sites for Redevelopment	209	57,926		0.41
0-2 Stories	205	57,908		0.40
Commercial & Office Buildings	9	63,001	1968	0.17
Industrial & Manufacturing	132	57,606	1952	0.57
Transportation and Utility	7	61,944	1931	0.17
Parking	37	56,281	1931	0.12
Vacant Land	20	59,205	N/A	0.00
3 or more stories	4	58,858		0.67
Industrial & Manufacturing	4	58,858	1931	0.67
Grand Total	339	58,386		0.78

Source: PLUTO 2016

Figure 10

Select land use and building characteristics on sites 10,000-40,000 sq. ft. in Designated Areas and with 500 feet of a designated truck route

Number of Floors and Land Use	Total lots	tax Average lot area	Median Year built	Average built FAR
Conversion Candidates	679	19,645	1947	1.30
0-2 Stories	591	19,627	1950	1.09
Commercial and Office	27	18,720	1960	1.09
Industrial & Manufacturing	509	19,737	1950	1.09
Parking	50	19,112	1954	1.05
Unknown	5	18,428	1950	0.85
3 or more stories	88	19,769	1929	2.76
Commercial and Office	11	21,581	1931	2.79
Industrial & Manufacturing	77	19,510	1928	2.76
Soft Sites for development	749	20,321	1950	0.36
0-2 Stories	743	20,325	1950	0.36
Commercial and Office	64	20,214	1960	0.36
Industrial & Manufacturing	322	21,759	1949	0.65
Parking	172	19,668	1950	0.17
Vacant	92	18,514	N/A	0.00
Unknown	93	18,444	1931	0.04
3 or more stories	6	19,804	1929	1.16
Commercial and Office	2	10,725	1914	0.62
Industrial & Manufacturing	4	24,344	1931	1.44
Grand Total	1,428	20,000	1949	0.81

Figure 11

Employment on tax lots 40,000-90,000 SQ. FT. within 500 ft. of a truck route in Designated Areas

Sector	Employment 2015, by site category					
	Conversion Candidates		Soft Sites		Total employment	Total businesses
	0-2 stories	3 or more stories	0-2 stories	3 or more stories		
Industrial	4,002	1,938	5,599	348	11,887	451
Wholesale Trade	1,217	D	1,295	D	3,129	171
Transportation and Warehousing	1,156	109	2,283	0	3,548	109
Manufacturing	1,191	1,260	438	0	2,889	74
Construction	199	D	707	D	1,141	43
Retail (nonstore retail, building material supply & auto parts retail only)	46	38	314	0	398	21
Other Services (repair & maintenance only)	11	D	35	D	57	13
Waste Management and Remediation Services	103	0	502	0	605	9
Real Estate and Rental and Leasing (commercial & industrial equipment rental only)	D	879	18	0	108	5
Other	2,506	879	1,959	28	5,372	196
Unclassified*	D	20	44	D	90	34
Retail Trade (excluding nonstore retail, building material supply & auto parts retail)	156	32	45	0	228	24
Real Estate and Rental and Leasing * (excludes commercial & industrial equipment rental)	39	22	298	0	359	28
Educational Services, Health Care & Social Assistance	1,574	647	468	0	2,417	21
Professional, Scientific, and Technical Services	100	74	95	0	262	24
Administrative and Support Accommodation and Food Services	40	D	40	D	111	20
Information*	28	36	D	D	791	15
Information*	535	D	210	0	751	10
Other Services (except Public Administration and Repair and Maintenance)	288	D	10	0	298	8
Finance and Insurance	D	D	D	0	12	5

Arts, Entertainment, and Recreation	0	13	D	0	30	5
Grand Total	6,508	2,817	7,558	376	17,529	647

Sources: QCEW 2015 and PLUTO; as analyzed by NYCDP HEIP Division in April 2017.

*Note that a review of the unclassified businesses indicates that many are registered under names that suggest that the companies are involved in the construction, wholesale, transportation and manufacturing sectors. However, since it not possible to determine the nature of these businesses, they are included as unclassified. Similarly, many of the companies listed as non-industrial real estate businesses include companies reporting to be "lessors of nonresidential buildings". A scan of these businesses appear to mostly include commercial warehouses as well as some film production studios that lease space to other companies. Many of the companies in the information category reported to be telecommunications businesses. A scan of these firms indicates that the category includes many private utilities that must site infrastructure and vehicle fleets within M zones.

** D = Undisclosed due to confidentiality requirements that prohibit disclosure of any data that represents fewer than 3 firms or where the total employment for any individual firm represents 80 percent or more of total employment in the cell.

Figure 12:

Employment on tax lots 10,000 to 40,000 SQ. FT. within 500 ft. of a truck route in Designated Areas

	Employment 2015, by site category				Total employe nt	Total businesses
	Conversion Candidates		Soft			
	0-2 stories	3 or more stories	0-2 stories	3 or more stories		
Industrial	10,385	2,573	7,545	612	21,115	1,237
Wholesale Trade	2,363	409	1,675	46	4,493	352
Manufacturing	2,795	1023	1,162	D	4,995	242
Construction	2,555	546	1,503	D	5,015	230
Transportation and Warehousing	1,655	364	1,218	D	3,278	203
Other Services (repair & maintenance only)	331	62	310	0	703	98
Retail (nonstore retail, building material supply & auto parts retail only)	465	38	284	D	886	66
Waste Management & Remediation Services	202	D	1,177	0	1,386	27
Real Estate & Rental & Leasing (commercial & industrial equipment rental only)	18	D	216	0	270	10
Information (motion picture recording only)	0	38	0	0	38	6
Utilities	D	D	0	0	51	2
Other	2,926	2753	1,651	3	7,333	507
Unclassified*	163	49	37	D	250	115
Real Estate & Rental & Leasing* (excludes commercial & industrial equipment rental)	499	149	149	0	797	83
Retail Trade (excluding nonstore retail, building material supply & auto parts retail)	533	75	98	0	706	69
Professional, Scientific, and Technical Services	70	405	211	D	688	64
Administrative Support Services	516	69	212	0	797	45
Accommodation and Food Services	294	10	479	0	783	42
Arts, Entertainment, and Recreation	185	23	203	0	411	26
Finance and Insurance	13	6	105	0	124	21
Other Services (except Public Administration and Repair and Maintenance)	196	57	122	0	375	19
Information* (except motion picture recording)	427	82	0	0	509	9
Educational Services	30	D	D	0	86	8
Health Care and Social Assistance	D	D	0	0	1805	5

Grand Total	13,311	5,326	9,196	615	28,448	1,744
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Sources: QCEW 2015 and PLUTO; as analyzed by NYCDCP HEIP Division in April 2017.

*Note that a review of the unclassified businesses indicates that many are registered under names that suggest that the companies are involved in the construction, wholesale, transportation and manufacturing sectors. However, since it not possible to determine the nature of these businesses, they are included as unclassified. Similarly, many of the companies listed as non-industrial real estate businesses include companies reporting to be "lessors of nonresidential buildings". A scan of these businesses appear to mostly include commercial warehouses as well as some film production studios that lease space to other companies. Many of the companies in the information category reported to be telecommunications businesses. A scan of these firms indicates that the category includes many private utilities that must site infrastructure and vehicle fleets within M zones.

** D = Undisclosed due to confidentiality requirements that prohibit disclosure of any data that represents fewer than 3 firms or where the total employment for any individual firm represents 80 percent or more of total employment in the cell.

Candidates for conversion to self-storage

As shown in Figure 7, approximately 46 percent of all the potential sites are currently built to more than half the currently permitted commercial FAR, and thus considered more likely candidates for conversion rather than redevelopment or new construction.

Among large sites, (see Figure 9), the majority (91) of these buildings are low rise (0-2 story) industrial and manufacturing buildings, with a median build year of 1959. As shown in Figure 22, low-rise industrial buildings also accounted for the majority of conversion candidates on small sites (509 or 679), but were slightly older, with a median build year of 1950.

On large sites, 29 conversion candidates were three or more stories, the vast majority of which (26) were industrial and manufacturing buildings with a median year built of 1930. There were 88 multi-story buildings on small sites, of which 77 were in industrial and manufacturing buildings with a median build year of 1928.

The multi-story industrial and manufacturing loft buildings represent better potential candidates for conversion to self-storage because they are generally larger (average built FAR is 2.55 on large sites and 2.76 on smaller sites, compared to 1.03 and 1.09 for low-scale buildings), providing a greater potential return on investment for a use like self-storage, which may be better able to maximize upper story space compared to other industrial uses. Therefore, the 114 multistory industrial and manufacturing buildings on small and large lots are assumed to be representative of the types of existing buildings that could be most reasonably expected to be converted to self-storage.

As shown in Figure 11 above, on large sites these conversion candidates (buildings with 3 or more stories that are “not soft”) supported approximately 2,800 private jobs in 2015 (the latest year for which data are available), of which just under 2,000 were in traditional industrial sectors, and other sectors with similar land use characteristics. The majority (approximately 1,260) of these jobs were in manufacturing; notably, a plurality (44 percent) of all the manufacturing jobs on the self-storage candidate sites (conversion and new construction) were located in multistory industrial buildings that are not soft. The only other sectors with a significant amount of employment in the multistory conversion candidate were health care and education (approximately 650 employees).

Employment patterns within multistory industrial buildings on small sites were similar to the large sites. As shown in Figure 12, buildings with three or more stories that are “not soft” support over 5,300 private jobs in 2015, of which just more than half (2,573) were in traditional industrial sectors. Manufacturing accounted for approximately 1,000 private jobs in these buildings. Of the nonindustrial sectors, professional and technical services accounted for the most jobs, with approximately 400.

Candidates for new construction self-storage

As shown in Figure 7, 958 (54 percent) of the candidate development sites are currently built to less than half the currently permitted commercial FAR, and thus considered more likely candidates for new construction. These sites are almost exclusively low rise (948 of 958 are 0-2 stories).

Among the larger sites, the majority (132, or 63 percent) are low-rise industrial and manufacturing buildings with a median year built of 1952. These sites tend to have relatively low lot coverage (the average built FAR is 0.57), indicating the presence of open parking or storage yards common in post-war warehouse developments. Sixty-three sites are largely unimproved (average built FAR of 0 to 0.17) and are currently used for transportation, parking or are vacant. Nine of these sites are commercial or office buildings with a median year built of 1968.

Among small sites, 43 percent (322) are in low-rise industrial and manufacturing buildings with a median build year of 1949. Lot coverage was modestly higher than the large sites (average built FAR is 0.65). A greater proportion (48 percent) of the smaller sites were largely unimproved (built FAR of 0 to 0.17) and the land use is currently vacant, parking or unknown.

As shown in Figure 11 above, the large soft site candidates for new self-storage supported over 7,550 private jobs in 2015, with employment overwhelmingly concentrated in industrial sectors (74 percent of total jobs). Over half of the total employment on these sites were in truck-dependent wholesale trade, transportation and warehousing sectors and construction, which often require storage yards.

These larger redevelopment sites also supported approximately 2,000 non-industrial jobs dispersed across several sectors. Education and health care accounted for just under 500 jobs. It should be noted that many of the businesses reporting to be in “nonindustrial” economic sectors locate facilities on the candidate sites that have operational needs and impacts similar to industrial businesses. For instance, a review of the unclassified businesses indicates that many are registered under names that suggest that the companies are involved in the construction, wholesale, transportation and manufacturing sectors. However, since it is not possible to determine the nature of these businesses, they are included as unclassified. Similarly, many of the companies listed as non-industrial real estate businesses include companies reporting to be “lessors of nonresidential buildings”. A scan of these businesses appear to mostly include commercial warehouses as well as some film production studios that lease space to other companies. Many of the companies in the information sector reported to be telecommunications businesses. A scan of these firms indicates that the category includes many private utilities that must site infrastructure and vehicle fleets within M zones.

Employment on the smaller sites for redevelopment was also heavily industrial. These sites supported over 9,000 private jobs in 2015, of which the vast majority (over 80 percent) were in industrial sectors. While employment on the larger soft sites was more heavily concentrated in the transportation and wholesale sectors, industrial employment on the smaller sites was more evenly distributed across sectors. These sites supported roughly equal numbers of jobs in the wholesale trade, manufacturing, construction, transportation and waste management sectors. Nonindustrial employment represented only 18 percent of the total private employment on the smaller soft sites. Employment was spread across several nonindustrial sectors, with accommodation and food services (479 jobs), administrative support (212 jobs), and professional, scientific and technical services (211 jobs) leading nonindustrial jobs.

3.3.1.2. M and C8 districts outside of Designated Areas

M and C8 districts tend to be less industrial in character, often closer to transit and residencies and consist of smaller lots than Designated Areas in M Districts. Land uses within M and C8 Districts outside of

Designated Areas are a mix of transportation and utilities, residential, industrial, and commercial uses, vacant land, and parking facilities. Figure 13 provides an overview of the land uses outside of Designated Areas within M and C8 Districts. In terms of land area, transportation and utilities comprise more than 39 percent of M and C8 districts outside of Designated Areas. However, these uses only account for approximately 10 percent of total lots due to the large size of airports, rail yards, and other major infrastructure. Residential land uses, which include one and two family homes and multifamily buildings, account for nearly 17 percent of land area within M and C8 Districts outside of Designated Areas, and nearly a quarter of total lots within these areas, which is a much higher percentage than in Designated Areas in M districts. Industrial and manufacturing uses and commercial uses occupy similar amounts of land within M and C8 Districts outside of Designated Areas, 10 percent and 9 percent, respectively. However, commercial buildings within these areas tend to occupy larger sites than manufacturing uses.

Other than transportation and utilities, and large public facilities such as Rikers Island, the lots outside of the Designated Areas tend to be slightly smaller than lots within the Designated Areas. The distribution of land uses outside the Designated Areas also tend to be more heterogeneous and mixed, with industrial, commercial, and residential uses occurring in close proximity to one another.

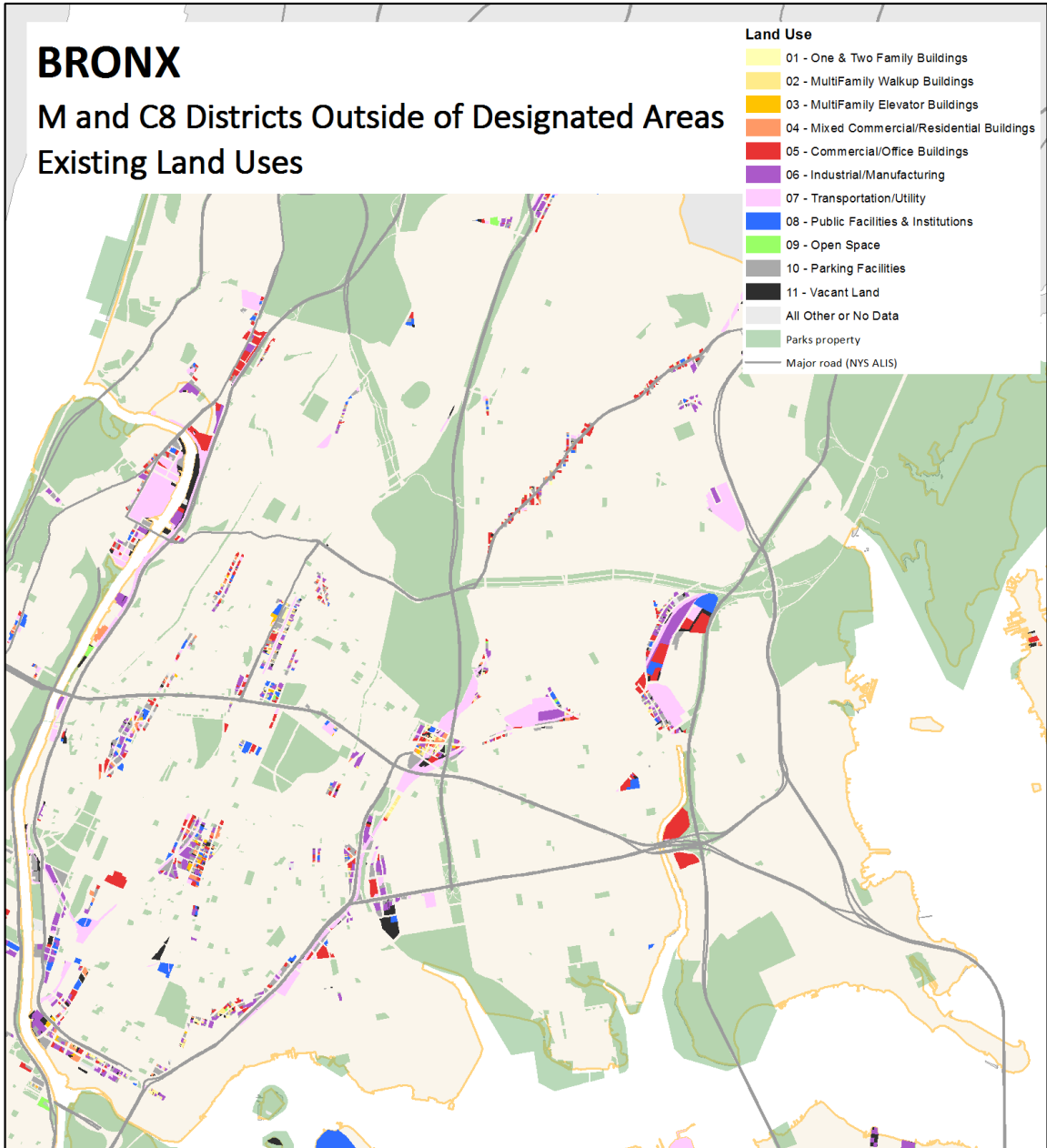
Some areas do tend to be disproportionately dominated by certain land uses:

- Within North Brooklyn, residential land uses dominate M districts in Williamsburg, while larger concentrations of industrial uses exist outside of the Brooklyn Navy Yard and south of Newtown Creek in Bushwick.
- Staten Island has significant portions of vacant land and transportation and utilities, with pockets of commercial land uses. Fewer industrial land uses exist outside of Designated Areas on Staten Island.
- Land uses outside of Designated Areas in the Bronx tend to be highly mixed, with no significant trends regarding the location and distribution of certain land uses.
- In Queens, residential uses are clustered in Long Island City with larger commercial and industrial uses to the north and east of the railyards in Sunnyside and Astoria. Land uses outside of the Designated Areas in College Point are predominantly industrial and commercial and include relatively fewer residential uses.

OVERVIEW OF LAND USES IN M AND C8 OUTSIDE OF DESIGNATED AREAS	NUMBER OF LOTS	PERCENT OF TOTAL LOTS	ACRES	PERCENT OF TOTAL AREA
TRANSPORTATION/UTILITIES	3427	10.2%	9,177.8	39.1%
RESIDENTIAL BUILDINGS	8359	24.8%	3,917.4	16.7%
INDUSTRIAL/MANUFACTURING BUILDINGS	6185	18.3%	2,366.1	10.1%
COMMERCIAL/OFFICE BUILDINGS	4337	12.8%	2,194.7	9.4%
VACANT LAND	2824	8.4%	1,981.2	8.4%
PARKING FACILITIES	3996	11.8%	1,862.3	7.9%
PUBLIC FACILITIES AND INSTITUTIONS	885	2.6%	840.8	3.6%
NO DATA	971	2.9%	460.8	2.0%
OPEN SPACE	209	0.6%	382.8	1.6%
MIXED COMMERCIAL/RESIDENTIAL BUILDINGS	2567	7.6%	284.2	1.2%

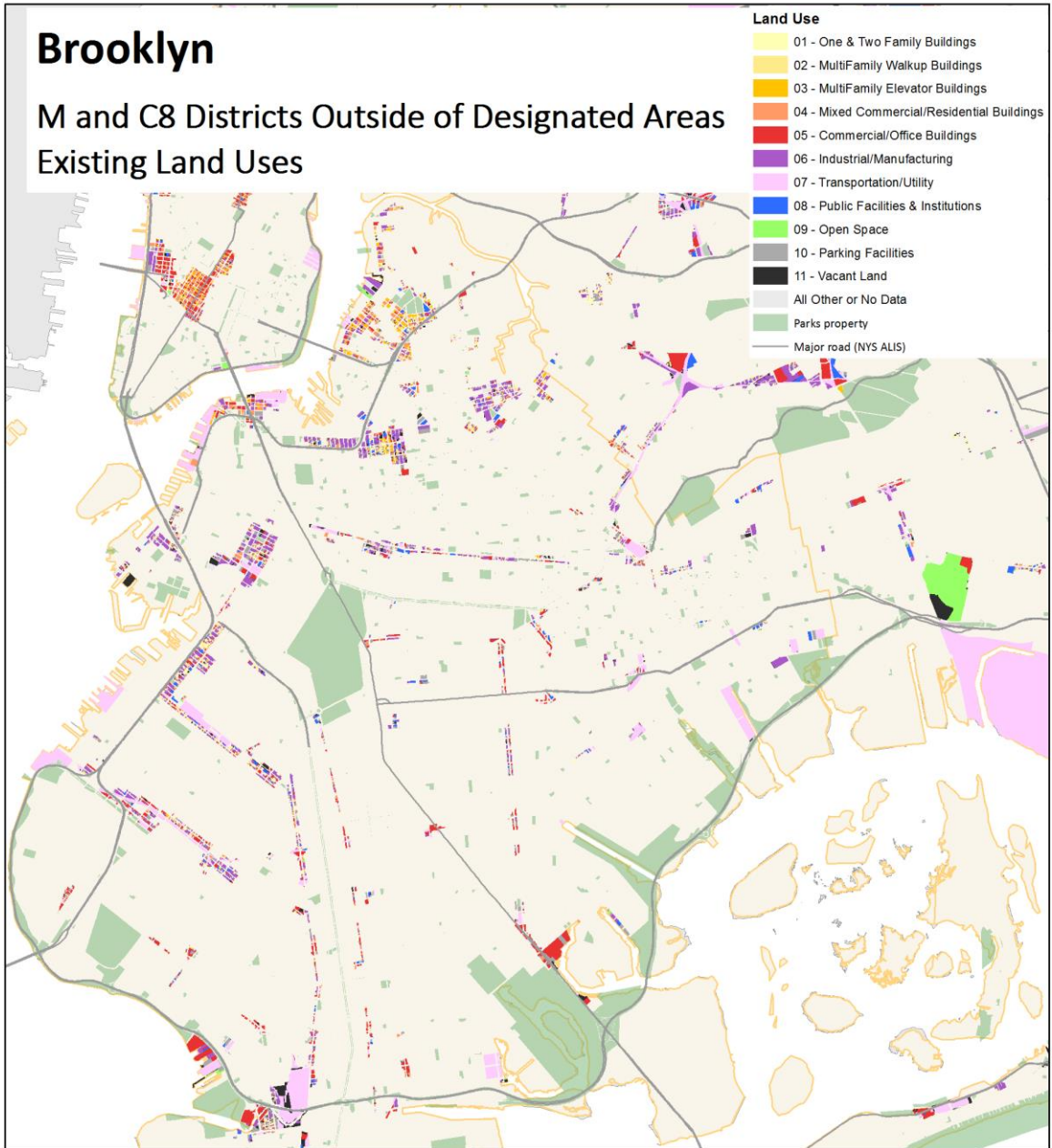
Figure 13

Source: NYC DCP PLUTO 16v2



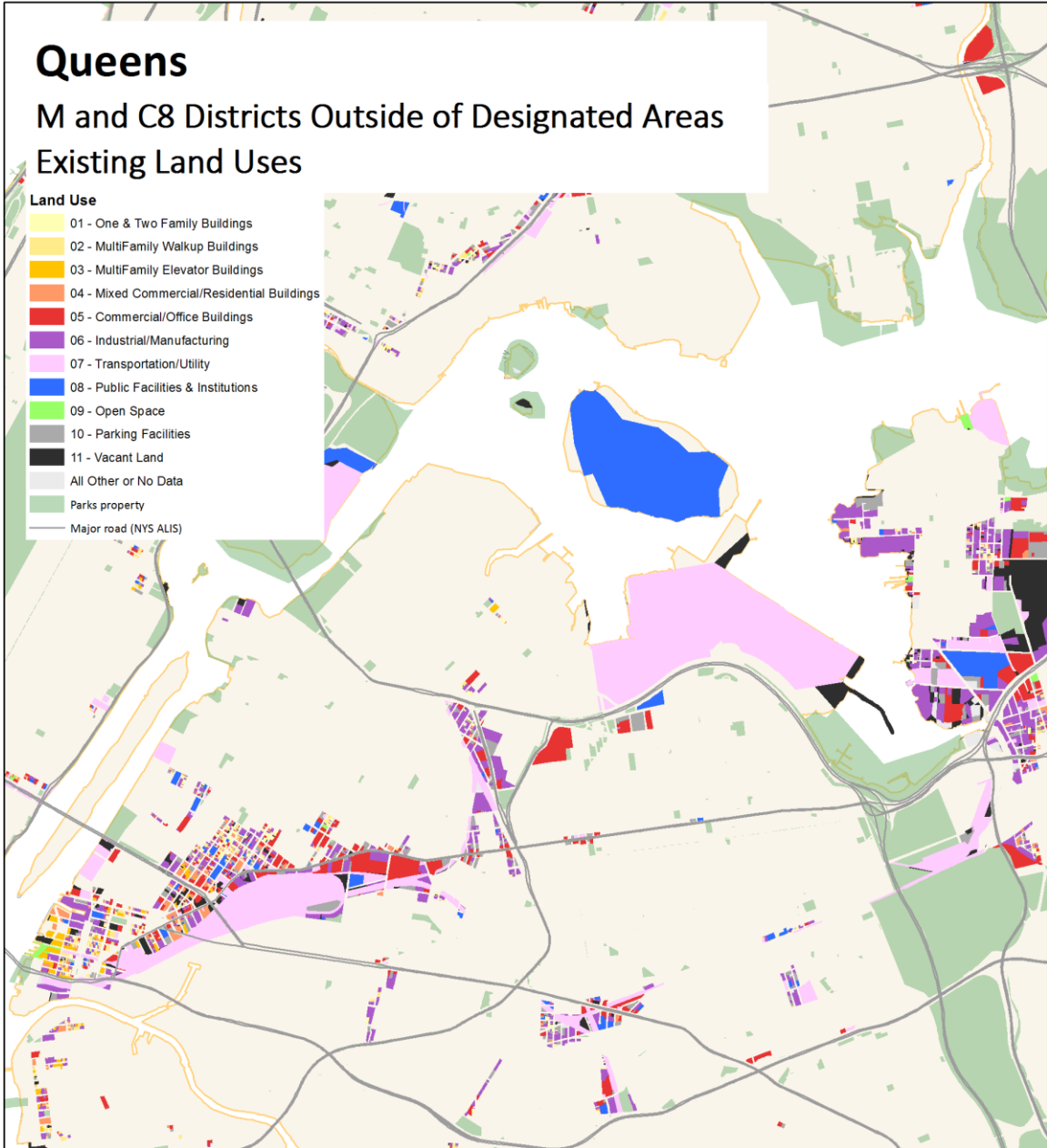
NYC Department of City Planning, PLUTO 16v2

Figure 14



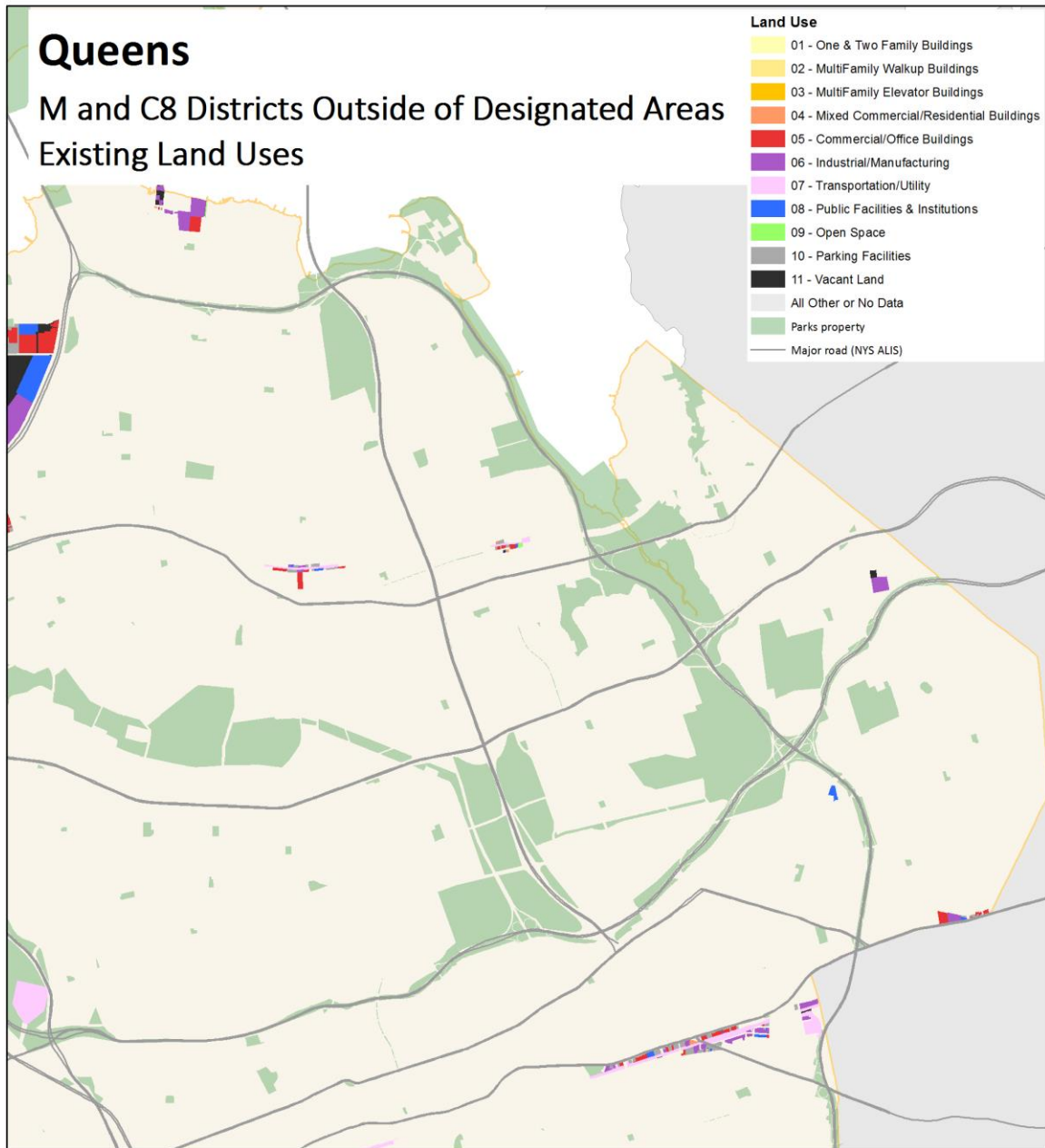
NYC Department of City Planning, PLUTO 16v2

Figure 15



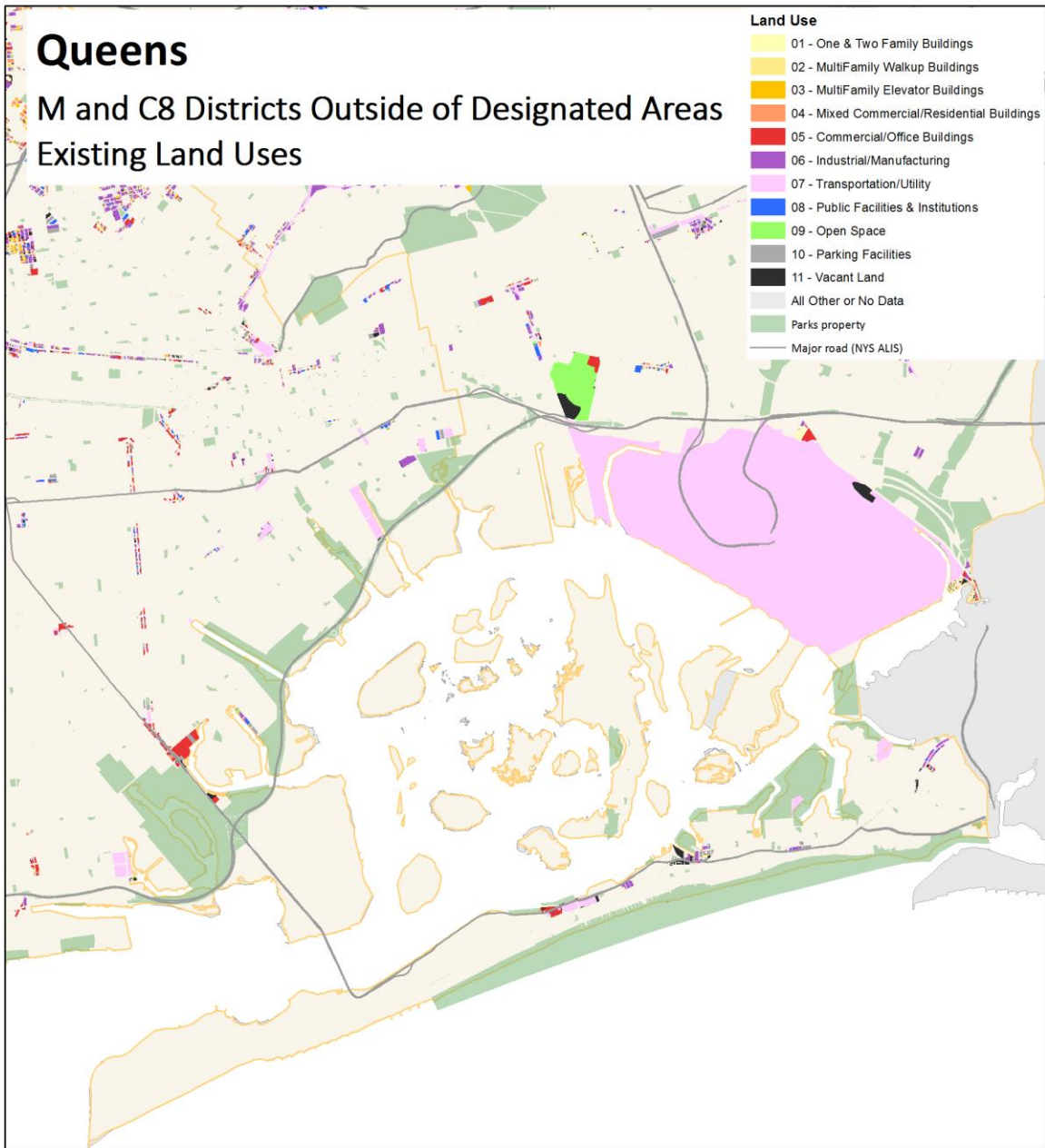
NYC Department of City Planning, PLUTO 16v2

Figure 16



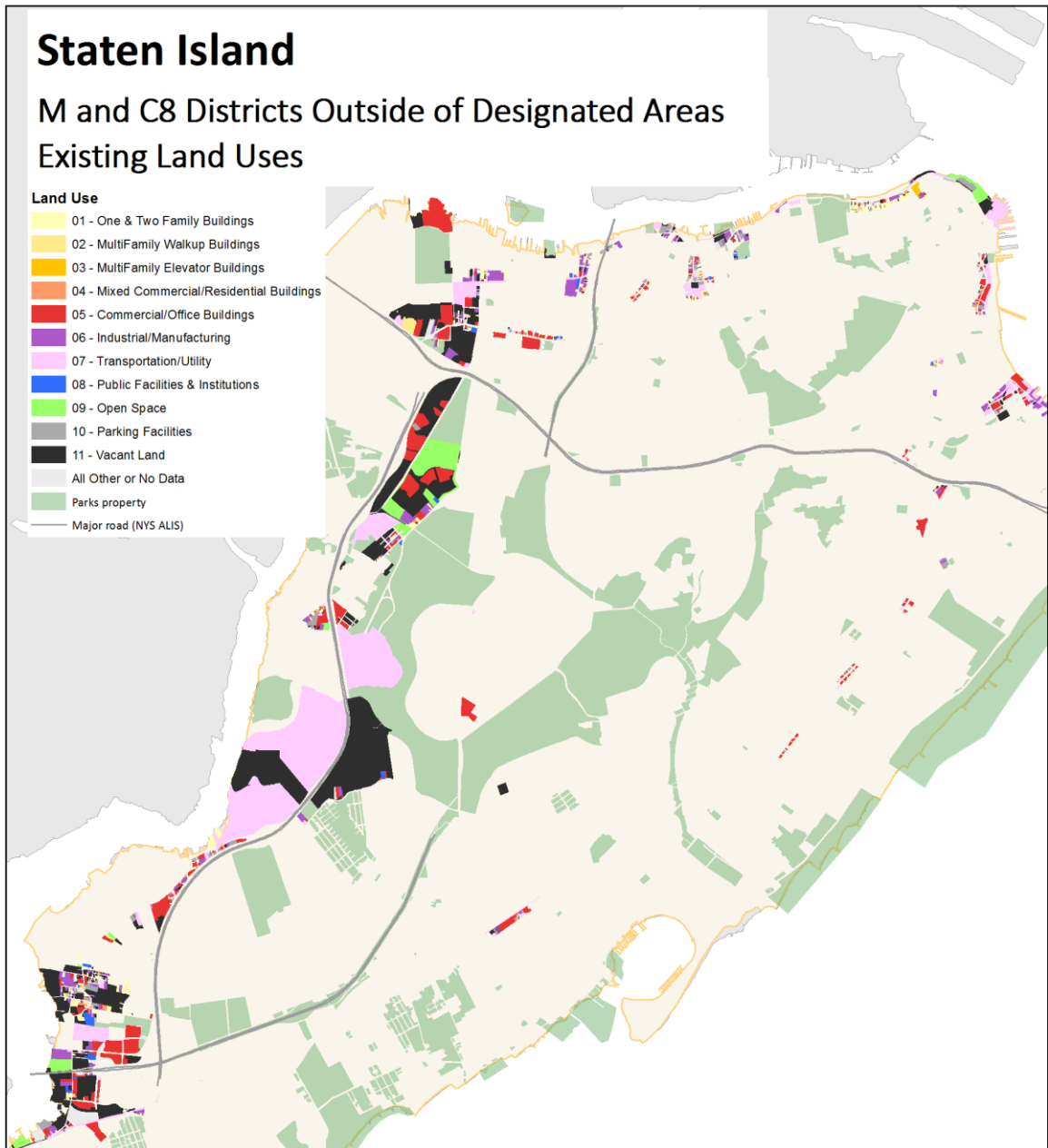
NYC Department of City Planning, PLUTO 16v2

Figure 17



NYC Department of City Planning, PLUTO 16v2

Figure 18



NYC Department of City Planning, PLUTO 16v2

Figure 19

In early 2017, there were approximately 240 self-storage facilities in New York City. Overall, more than half of all self-storage facilities are located in M and C8 districts outside of Designated Areas.

3.3.2. Existing Zoning

3.3.2.1. *Designated Areas in M Districts*

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

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

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

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

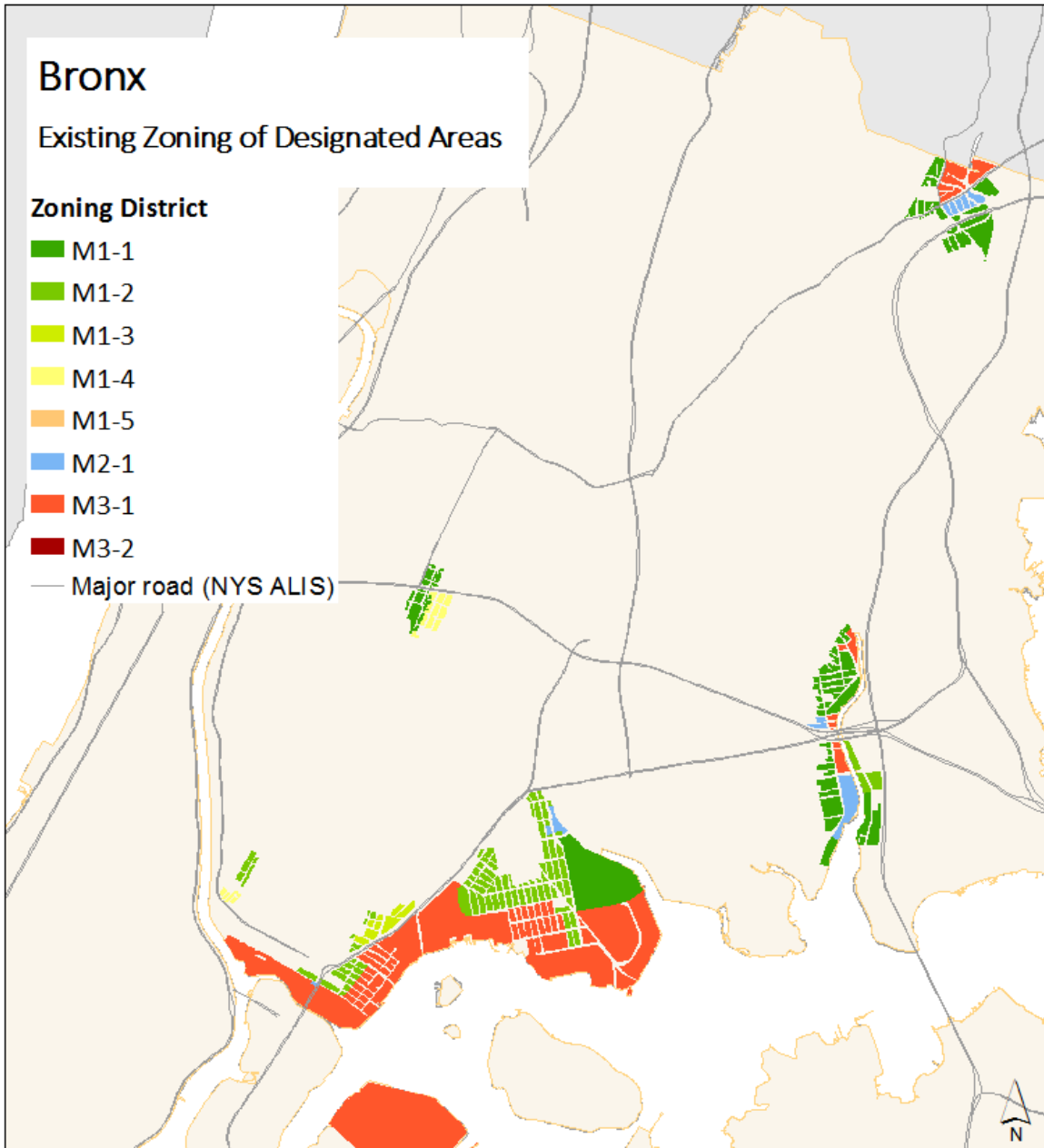
Figure 20 describes the permitted floor area ratio (FAR) and parking requirements in each districts, as well as the overall percentage of land area within the Designated Area that is mapped as each zoning district. Within the Designated Areas, 55% of land area is mapped as M1, 15% is mapped as M2, and the remaining 30% is mapped as M3. In terms of bulk regulations with the Designated Areas, 18% of land area permits a

maximum FAR of 1.0, 66% of land area allows a maximum FAR of 2.0, and the remaining 16% allows a maximum FAR of 5.0.

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

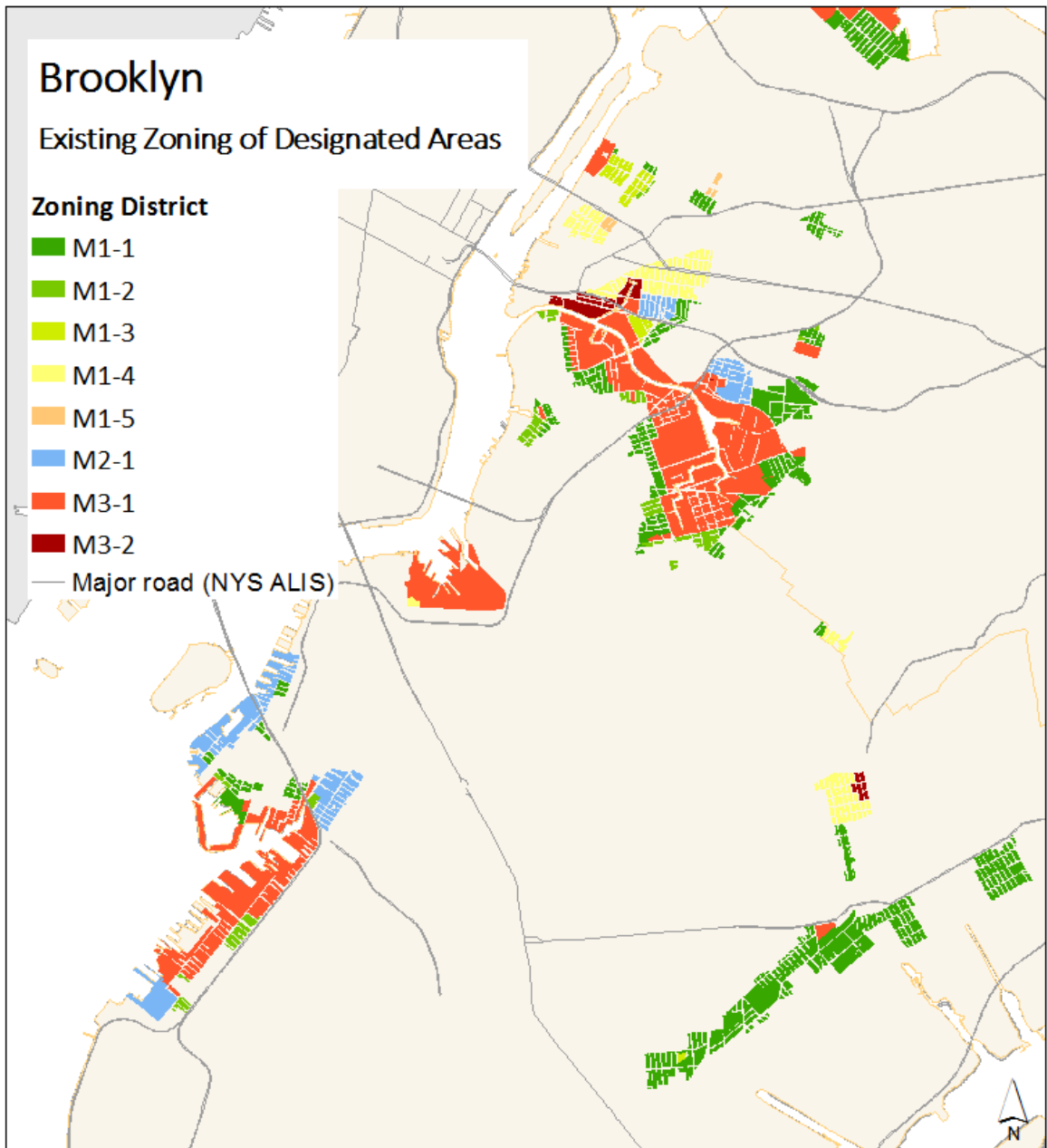
Figure 20: Designated Area Existing Zoning

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



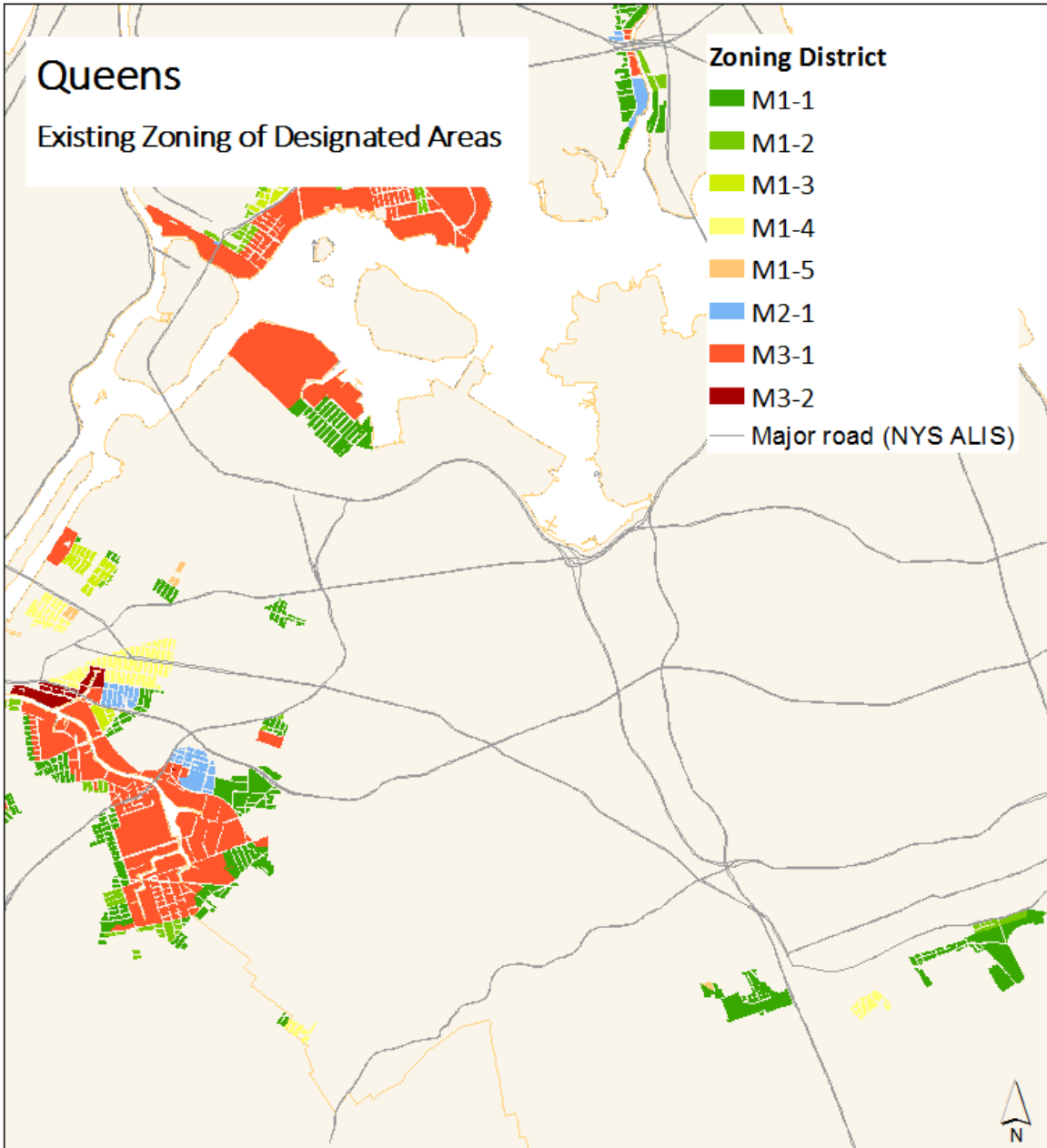
NYC Department of City Planning, PLUTO 16v1

Figure 21



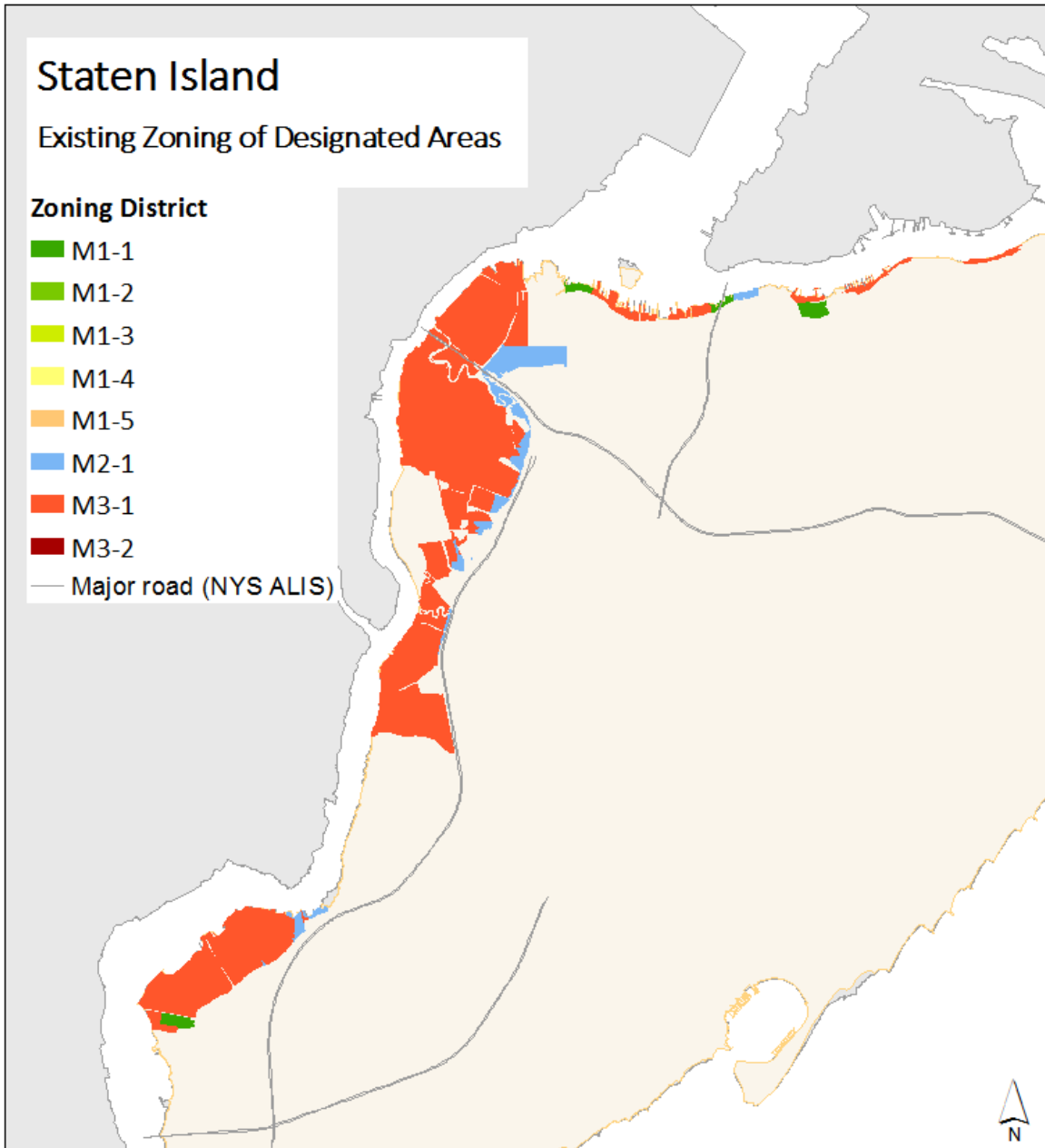
NYC Department of City Planning, PLUTO 16v1

Figure 22



NYC Department of City Planning, PLUTO 16v1

Figure 23



NYC Department of City Planning, PLUTO 16v1

Figure 24

3.3.2.2. M and C8 districts outside of Designated Areas

M and C8 districts outside of the Designated Areas are comprised of C8, M1, M2, and M3 districts. These areas also include land mapped with mixed use zoning districts that permit both light industrial and residential uses.

C8 districts bridge commercial and manufacturing uses and provide for automotive and other heavy commercial services that often require large amounts of land. Typical uses permitted in C8 districts include automobile showrooms and repair shops, warehouses, gas stations and car washes. Most commercial uses as well as certain community facilities are also permitted in C8 districts.

Within the M1, M2, and M3 districts outside of Designated Areas, industrial uses are permitted, according to the characteristics of their operations. Each of the three districts incorporates performance standards limiting the amount and type of industrial nuisances permitted. Light manufacturing uses are permitted in all manufacturing districts. Potentially noxious uses (Use Group 18) are limited to M3, but may also locate in M1 and M2 districts if they comply with the higher performance standards of those districts.

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

Within the M and C8 districts outside of Designated Areas, almost 55 percent of land area is mapped as M1. The majority of this is mapped as M1-1 (47 percent of all indirectly affected areas), which allows a maximum floor area ratio of 1.0. 7 percent is mapped as M2, and 24 percent is mapped as M3. In addition to these areas that do not permit residential, some of the indirectly affected area is mapped with mixed use zoning districts. In total, mixed use districts in the indirectly affected area comprise less than 4% of total land area, but make up approximately 16 percent of lots, due to the relatively smaller lot size for areas mapped as mixed use manufacturing districts. C8 districts comprise more than 6 percent of land and nearly 9 percent of lots in the indirectly affected area. Figure 25 summarizes the amount and proportion of land within M and C8 districts outside of the Designated Area.

Figure 25: Existing Zoning in M and C8 Districts outside of Designated Areas (Source: PLUTO 16v2)

District	Acres	Percentage of Total Acres	of Lots	Percent of Total Lots
C8-1	860	3.5%	1,932	4.8%
C8-2	520	2.1%	992	2.5%
C8-3	153	0.6%	534	1.3%
C8-4	29	0.1%	104	0.3%
M1-1	11,559	47.5%	12,953	32.2%
M1-1 Mixed Use	82	0.3%	657	1.6%
M1-2	856	3.5%	3,439	8.6%
M1-2 Mixed Use	356	1.5%	3,300	8.2%

M1-3	112	0.5%	366	0.9%
M1-3 Mixed Use	27	0.1%	62	0.2%
M1-4	469	1.9%	1,473	3.7%
M1-4 Mixed Use	155	0.6%	1,007	2.5%
M1-5	159	0.7%	358	0.9%
M1-5 Mixed Use	221	0.9%	1,306	3.2%
M1-6	127	0.5%	722	1.8%
M1-6 Mixed Use	27	0.1%	100	0.2%
M2-1	1,648	6.8%	1,705	4.2%
M2-3	123	0.5%	74	0.2%
M2-4	38	0.2%	78	0.2%
M3-1	5,825	23.9%	2,432	6.1%
M3-2	122	0.5%	167	0.4%

M1-1 Mixed Use: M1-1/R5, M1-1/R7-2, M1-1/R7D, M1-1D

M1-2 Mixed Use: M1-2/R5B, M1-2/R5D, M1-2/R6, M1-2/R6A, M1-2/R6B, M1-2/R7A, M1-2/R8, M1-2/R8A, M1-2D

M1-3 Mixed Use: M1-3/R7X, M1-3/R8

M1-4 Mixed Use: M1-4/R6A, M1-4/R6B, M1-4/R7-2, M1-4/R7A, M1-4/R7X, M1-4/R8A, M1-4D

M1-5 Mixed Use: M1-5/R10, M1-5/R7-2, M1-5/R7-3, M1-5/R7X, M1-5/R8A, M1-5/R9, M1-5/R9-1, M1-5A, M1-5B, M1-5M

M1-6 Mixed Use: M1-6/R10, M1-6D

3.4. EXISTING PUBLIC POLICY

The 2014 CEQR Technical Manual stipulates that a preliminary assessment should identify and describe any public policies (formal plans, published reports) that pertain to the study area, and should determine whether the proposed project could alter or conflict with identified policies. The policies described below are both related to the Designated Areas in M Districts and in most instances also M and C8 districts outside of Designated Areas.

3.4.1.1. One New York Plan

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

Vision 1 of *OneNYC* states that New York City will continue to be the world's most dynamic urban economy, where families, businesses, and neighborhoods thrive. A primary goal within that vision is the expansion

and cultivation of industry, the growth of quality jobs across a diverse range of sectors, and the activation of the City's industrial assets to support the creation of quality jobs and job-intensive uses (NYC Office of the Mayor, 2015b).

3.4.1.2. 10-Point Industrial Action Plan

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

3.4.1.3. Business Improvement Districts

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

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

3.4.1.4. Waterfront Revitalization Program

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

The New York City Waterfront Revitalization Program (WRP) establishes the City's policies for waterfront planning, preservation and development projects to ensure consistency over the long term. The goal of the program is to maximize the benefits derived from economic development, environmental conservation and public use of the waterfront, while minimizing any potential conflicts among these objectives. The WRP is authorized by New York State's Waterfront Revitalization of Coastal Areas and Inland Waterways Act, which was enacted in response to the Federal Coastal Zone Management Act, and allows municipalities to participate in the State's Coastal Management Program by creating their own local Waterfront Revitalization Program.

3.5. FUTURE NO-ACTION CONDITION

3.5.1.No-Action Land Use

3.5.1.1. *Designated Areas in M Districts*

As described above in Existing Conditions, the Designated Areas are characterized predominantly by industrial land use and industrial employment. These areas have also experienced the city's most robust job gains in the construction, transportation, wholesale and manufacturing jobs. (For a detailed description of the employment characteristics of the IBZs, see Appendix (DCP, 2016). Although these areas have experienced some non-industrial job growth, the land use characteristics remain predominantly industrial.

An analysis of recent developments on large lots in Designated Areas since 2010 (see Figure 6 for more details) shows that self-storage represents almost one quarter of new development on lots over 20,000 SF in these areas. Aside self-storage, industrial uses represent a large number of permits for new construction. The industrial uses include vehicle repair, wholesale and distribution, courier services, construction-related uses and the manufacturing of concrete, plastic and steel. Non-industrial new developments are hotels, retail, offices, which are for the most part permitted by zoning regulations, but also a school and a residential development. Accordingly, development has covered a wide spectrum and a variety of uses and businesses, even in NYC's most active industrial areas.

In the Future No-Action Condition, recent patterns of employment and development are expected to continue, affecting land use conditions within the Designated Areas. Self-storage will continue to represent a significant share of new construction on large sites in Designated Areas. As projected in the Analysis Framework, although the exact number of self-storage facilities cannot be predicted, for analytic purposes, it is assumed that the last decade's trends will continue until the Build Year, meaning that the number of self-storage facilities that could be expected in proposed Designated Areas in M districts until the Build Year would amount to approximately twenty. These developments are seen to occupy land that could have provided a siting opportunity for a more job-intensive industrial business. The scarcity for large, industrial sites may become more acute. In the No-Action Condition, it is expected that some of the more traffic-intensive uses, such as transportation and distribution, would locate on smaller sites without off-street loading, potentially closer to residential populations. This could lead to increased land use conflicts in the Designated Areas in M districts.

Despite self-storage growth, it is expected that in the Future No-Action Condition, Designated Areas will continue to be the city's most viable industrial area, supporting employment growth in industrial and manufacturing sectors. Modest non-industrial job growth is also expected, consistent with recent trends.

Given the policy goals formulated under Mayor de Blasio's 10-point Action Plan, maintaining the availability of optimal industrial sites for industrial businesses is crucial. Under the Future No-Action Condition, the City's vision for proposed Designated Areas in M districts, as active industrial areas for commercial and industrial innovation, employment growth and the provision of essential industrial services and utilities is potentially discouraged by the continued growth of self-storage facilities.

3.5.1.2. *M and C8 districts outside of Designated Areas*

As explained under Existing Conditions, land uses outside the Designated Areas tend to be more heterogeneous and mixed, with industrial, commercial, and residential uses occurring in close proximity to one another. In M districts outside Designated Areas, according to DCP employment analysis (see Appendix), industrial sectors are somewhat less significant than in Designated Areas, and in 2014 just over half of the employees worked in *Retail Trade, Health Care & Social Assistance* (both non-industrial) *Construction* and *Transportation*. Job gains in M districts outside of Designated Areas have also been more mixed, with non-industrial employment dominating job growth. It is expected that recent trends in M and C8 districts outside of Designated Areas will continue, and that these areas will gain an increasing share of development in commercial, community facility and other uses.

As explained in the Analysis Framework, it is not possible to project with certainty the number and location of self-storage facilities that will be developed until the Build Year. Nevertheless, for the purposes of environmental review, a reasonable and conservative framework was developed. Regarding the development of self-storage facilities, under the No-Action Condition, the Analysis Framework projected that 66 new self-storage facilities would be developed in M and C8 districts outside Designated Areas by the Build Year. This was based on the assumption that self-storage development trends of the last decade would continue, with one quarter of self-storage construction occurring in Designated Areas, and three-quarters in M and C8 districts outside of Designated Areas. However, the Analysis Framework also conceded that in the Future No-Action, a smaller share of self-storage development could possibly take place in M and C8 districts outside of Designated Areas, since self-storage may decrease in competitiveness compared to other uses in these areas. The extent to which this could occur is not known.

3.5.1.2.1. *Prototypical Analysis*

Chapter 2 explains the methodology in selecting the prototypes, which were designed to analyze the potential environmental impacts that could occur in the With-Action condition if self-storage facilities move from Designated Areas to M and C8 districts located outside Designated Areas. In the Future No-Action Condition, the four selected prototypes would be the following:

Prototype 1: the existing business, an auto repair shop located in a single-story garage, would continue.

Prototype 2: the lot would be redeveloped as a specialized storage facility, such as art storage.

Prototype 3: the existing use, a wholesale business, would remain in place in the same building.

Prototype 4: the existing use, a moving and storage company, would continue in the loft building.

This is generally consistent with the kinds of uses and businesses that are located in M and C8 districts on the kinds of lots where self-storage could potentially be developed, as described in the section above.

3.5.2.No-Action Zoning

3.5.2.1. *Designated Areas in M Districts*

There are no known changes to existing zoning designations within the Designated Areas in M Districts in the Future No-Action Condition.

3.5.2.2. *M and C8 districts outside of Designated Areas*

There are both public and private applications in the pre-certification pipeline at the Department of City Planning, concerning rezonings from M and C8 districts to different zoning districts. None of these potential rezonings relate in their Purpose or Need to the Proposed Action. The public applications for rezonings considered here include: East Harlem, Inwood, Jerome Ave, Far Rockaway and Bay Street. For the purpose of environmental review, the “Analysis Framework” in Chapter 2 assumed that all of those applications would be granted. The total number of tax lot acres, where self-storage development could reasonably occur, currently considered for rezoning amount to 194 acres.

Other rezonings may occur, but those are not yet known to the Department of City Planning.

3.5.3.No-Action Public Policy

Based on the policies described under Existing Conditions, the Future No-Action Condition would generally be consistent with applicable policies, except for the 10-Point Industrial Action Plan.

3.5.3.1. *10-Point Industrial Action Plan*

In November 2015, Mayor de Blasio announced a 10-point Industrial Action Plan (NYC Office of the Mayor, 2015a), which aims to strengthen NYC’s most active industrial areas, invest in industrial and manufacturing businesses, and advance industrial-sector training and workforce development opportunities for New Yorkers. The Industrial Action Plans specifically mentions Industrial Business Zones (IBZs), subsets of the City’s manufacturing zones, where public policy aims to support employment growth, industrial innovation, and the provision of industrial services, which allow New York City to function and prosper. The Plan’s proposals include zoning changes, infrastructure investments and loans and grants for mission-driven developers. Part of the Plan’s proposed zoning changes include the Proposed Action, which proposes to establish restrictions on new self-storage facilities within IBZs to ensure that their development does not unduly limit future siting opportunities for industrial uses. As such, the No-Action Condition is intrinsically contrary to the 10-Point Industrial Action Plan.

In the Future No-Action Condition, recent patterns of employment and development are expected to continue, affecting land use conditions within the Designated Areas. Self-storage will continue to represent a significant share of new construction on large sites in Designated Areas and scarcity for large, industrial sites may become more acute. These projected self-storage developments in Designated Areas in M districts, symbolized by the representative examples, may utilize land and buildings that could instead be made available to industrial businesses that provide a greater number of jobs and/or essential industrial services.

Given the policy goals formulated under Mayor de Blasio's 10-point Action Plan, maintaining the availability of optimal industrial sites for industrial businesses is crucial. Under the Future No-Action Condition, the City's vision for proposed Designated Areas in M districts, as active industrial areas for commercial and industrial innovation, employment growth and the provision of essential industrial services and utilities is potentially discouraged by the continued growth of self-storage facilities.

3.6. FUTURE WITH-ACTION CONDITION

3.6.1. With-Action Land Use

The Proposed Action would introduce a Special Permit under the jurisdiction of the City Planning Commission for all new self-storage development in Designated Areas in M districts, which largely coincide with IBZ boundaries.

3.6.1.1. *Designated Areas in M Districts*

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

As explained in the Analysis Framework, it is not possible to project with certainty the number and location of self-storage facilities that will be developed until the Build Year in the With-Action condition. Nevertheless, for the purposes of environmental review, a reasonable and conservative framework was created. Under the With-Action Condition, assuming all pre-construction projects are realized and one CPC Special Permit is applied for and granted on a yearly basis (amounting to a total of nine Special Permits), a total of eleven new self-storage facilities would be built in the proposed Designated Areas in M districts until the Build Year, resulting in a net reduction of nine self-storage facilities in these areas.

Although this is not expected to significantly affect land use conditions within Designated Areas, it would affect the type of development and land use likely to occur on sites that are probable candidates for self-storage development. Yet, it is understood that the Proposed Action alone will not directly induce industrial development: numerous factors influence the kind of uses that are developed in any given area, which remain beyond the scope of the Proposed Action, and which the DCP has no control over. The Proposed Action solely aims to improve future siting opportunities for industrial businesses in NYC, in a context where industrial uses are growing and are already permitted as-of-right in M districts.

As both land use and employment trends described in this chapter and in more detail in reports in the Appendix of this DEIS, IBZs are active industrial areas. The introduction of a CPC Special Permit for self-storage development would establish a discretionary review process for new self-storage facilities. The CPC

Special Permit will ensure that the development of self-storage does not diminish siting opportunities for industrial and other more job-intensive businesses. In that sense, the Proposed Action is intended to facilitate development and employment patterns that have already appeared in IBZs, as documented in the Appendix. The Proposed Action would establish a CPC Special Permit in a manner that is intended to protect, promote and strengthen IBZs as New York City's most active industrial areas. The Proposed Action would not generate new land uses that would be incompatible with surrounding areas, but promote the availability of sites for land uses and businesses that typically locate in IBZs and contribute to NYC's job base and functionality. Therefore, land uses that would result in the Future With the Proposed Action represent a continuation of currently established land use trends, and would be compatible with surrounding land uses and built form. Furthermore, it is expected that some of the more traffic-intensive uses, such as transportation and distribution, that would – absent the Proposed Action – have located on smaller sites without off-street loading, potentially closer to residential populations, would instead locate on sites that would have been developed with mini-storage and operate under more adequate conditions.

3.6.1.2. M and C8 districts outside of Designated Areas

The existing employment and development patterns affecting land use conditions within M and C8 districts outside Designated Areas are expected to continue in the Future With-Action Condition. As explained under Existing Conditions, land uses outside the Designated Areas tend to be more heterogeneous with industrial, commercial, and residential uses occurring in close proximity to one another. In M districts outside Designated Areas, according to DCP employment analysis (see Appendix), industrial sectors are somewhat less significant than in Designated Areas, and in 2014 just over half of the employees worked in *Retail Trade*, *Health Care & Social Assistance* (both non-industrial) *Construction* and *Transportation*. Job gains in M districts outside of Designated Areas have also been more mixed, with non-industrial employment dominating job growth. It is expected that recent trends in M and C8 districts outside of Designated Areas will continue, and that these areas will gain an increasing share of development in commercial, community facility and other uses.

As explained in the Analysis Framework, it is not possible to project with certainty the number and location of self-storage facilities that will be developed until the Build Year in the With-Action condition. Nevertheless, for the purposes of environmental review, a reasonable and conservative framework was created. Under the With-Action Condition, it was projected that seventy self-storage facilities would be added to M and C8 districts outside of Designated Areas on a citywide basis by the time of the Build Year. This represents an increase of four new self-storage facilities in the M and C8 districts outside Designated Areas in M-districts by the time of the Build Year, compared to the sixty-six additional facilities projected in the No-Action Condition. This is not generally expected to affect land use conditions, particularly since the modest increase in self-storage development could occur anywhere in New York City where self-storage development would still be permitted as-of-right. It cannot be exactly determined where the additional four new self-storage facilities, projected on a citywide basis by the time of the Build Year, would be developed. However, it is clear that any such additional self-storage development would be relatively diffused; the potentially affected M and C8 districts are widely dispersed in the NYC and there are many sites where such development could potentially take place in these areas.

These M and C8 districts near Designated Areas in Manufacturing districts are typically large and contain numerous potential sites where such additional self-storage facilities could be placed. Therefore it cannot be predicted with certainty where such a self-storage facility would be built. Self-storage does not only site on large existing lots, but it is also typical for assemblages to occur before the construction of such a facility.

3.6.1.2.1. Prototypical Analysis

In the With-Action Condition, the prototypical sites in M and C8 districts outside of Designated Areas would be developed as self-storage facilities. As described in the prototypical analyses of other technical chapters, self-storage facilities do not generally create a large array of land use impacts or conflicts with the kinds of uses and businesses that are located in M and C8 districts. Accordingly, the self-storage facilities represented by Prototypes 1 – 4 would be considered compatible with the existing land uses in the M and C8 districts, as described in previous sections. Furthermore, self-storage facilities would remain as-of-right in M and C8 districts outside Designated Areas, precisely because their development in these areas is not typically regarded as an issue: the City is not pursuing the explicit goal of strengthening industrial uses and businesses in those areas, and maintaining future siting opportunities for industrial businesses in M and C8 districts outside of Designated Areas is not a specific concern of the Department of City Planning

3.6.2. With-Action Zoning

3.6.2.1. Designated Areas in M Districts

Aside from the Proposed Action which will introduce a CPC Special Permit, zoning in the With-Action Condition is not expected to change when compared to the No-Action Condition.

Due to its restrictive nature, the Proposed Action could create additional non-conformance. Approximately seventy self-storage facilities are expected to be grandfathered under the Proposed Action. However, the Proposed Action includes a clause that would allow for extensions and enlargements of such grandfathered self-storage facilities within the original zoning lot. The reconstruction of a grandfathered self-storage facility to the previously existing FAR, should it be damaged or destroyed, would also be permitted. This would give property owners some flexibility to renovate or enlarge their structures without needing to apply for a CPC Special Permit for such minor improvements. Accordingly, all grandfathered buildings would have the rights generally attributed to conforming structures and the Proposed Action would not significantly add to the number of non-conforming structures in IBZs.

3.6.2.2. M and C8 districts outside of Designated Areas

By the time of the Build Year, the No-Action and the With-Action Condition are expected to be the same in M and C8 districts outside of Designated Areas. As explained in the No-Action Condition, there are both public and private applications in the pre-certification pipeline at the Department of City Planning,

concerning rezonings from M and C8 districts to different zoning districts. None of these potential rezonings relate in their Purpose or Need to the Proposed Action. Other rezonings may occur, but those are not yet known to the Department of City Planning.

3.6.3. With Action Public Policy

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

3.6.3.1. *One New York Plan*

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

3.6.3.2. *10-Point Industrial Action Plan*

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

3.6.3.3. *Business Improvement Districts*

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

3.6.3.4. *Waterfront Revitalization Policy*

The Waterfront Revitalization Policy (WRP) policies were individually reviewed, to establish whether the Proposed Action promotes, hinders or is neutral to each WRP policy. Here included are written statements for all policies which are either promoted or hindered by the Proposed Action. By introducing a Special Permit, the Department of City Planning proposes to establish a framework to conduct a case-by-case, site-specific review to ensure that the development of self-storage facilities does not occur on sites that should

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

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

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

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

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

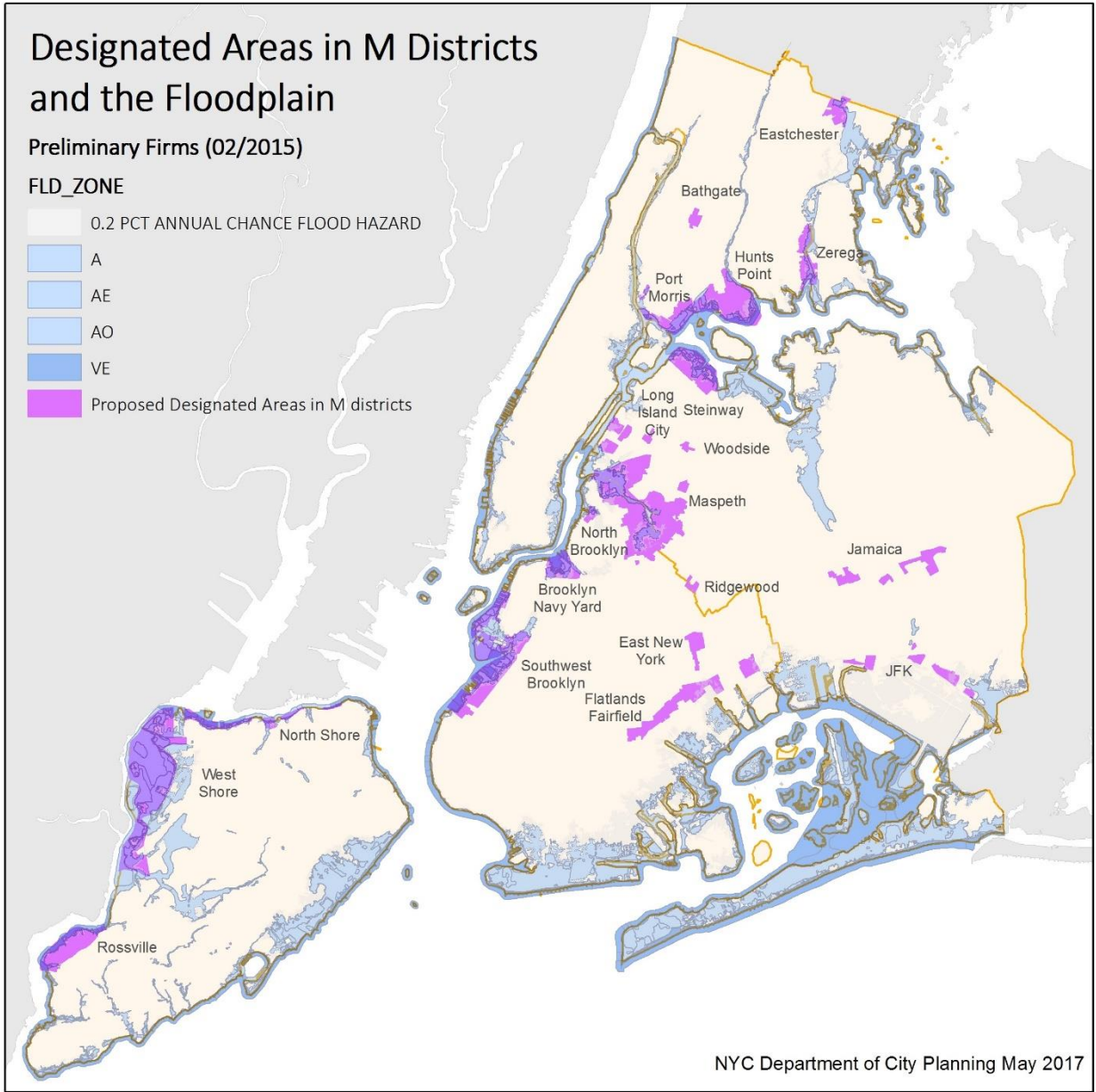


Figure 26

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

The Proposed Action affects Designated Areas in M districts, which contain many Significant Maritime Industrial Areas (SMIAs), but also other M districts. The Proposed Action aims to support the continuation of industrial uses in those areas outside SMIAs that are well-located relative to customers and delivery

networks and adequately buffered from surrounding residences, by ensuring that future self-storage development not reduce potential siting opportunities for such uses in Designated Areas in M districts. For these reasons, the Proposed Action promotes and is consistent with this policy.

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

Almost all of the proposed Designated Areas in M districts are within the floodplain. Exceptions are the Designated Areas in Jamaica, Flatlands/Fairfield, East New York, Ridgewood, Woodside and Bathgate (see Figure 26). The Proposed Action would encourage industrial and manufacturing uses, including maritime-dependent, consistent with the underlying zoning, to continue to develop subject to existing federal, state and local floodplain regulations. For these reasons, the Proposed Action promotes and is consistent with this policy.