

## 23. ALTERNATIVES

---

### 23.1. INTRODUCTION

As described in the 2014 *City Environmental Quality Review (CEQR) Technical Manual*, alternatives selected for consideration in an Environmental Impact Statement (EIS) are those that are feasible and have the potential to reduce, eliminate, or avoid any adverse impacts of a proposed action while meeting some or all of the goals and objectives of the action. As described in Chapter 1, "Project Description," the Proposed Action consist of a zoning text amendment to establish a new City Planning Commission (CPC) Special Permit for new self-storage developments. The Proposed Actions are intended to ensure that self-storage development does not utilize locations that may otherwise be used by a more job-intensive industrial use. This will be achieved by verifying that proposed self-storage facilities only take place only on sites that are suboptimal for industrial businesses and would prove unlikely for future industrial business locations.

This chapter considers the following four alternatives to the Proposed Actions:

- A No Action Alternative, which is mandated by CEQR and the State Environmental Quality Review Act (SEQRA), and is intended to provide the lead and involved agencies with an assessment of the expected environmental impacts of no action on their part.
- A Smaller Sites Exemption Alternative, which considers allowing self-storage facilities as-of-right on zoning lots of 20,000 sq. ft. or less.
- The Mixed Use Alternative presented in the DEIS has been revised and expanded upon in response to comments on the DEIS and is presented as the "A-text Alternative" in the FEIS. The A-text Alternative considers modifications to the Proposed Actions which would allow new self-storage uses in Designated Areas above the ground floor of a development as-of-right provided that at least 20,000 square feet of ground-floor space is set aside for more job-intensive industrial uses. DCP has prepared and filed an amended zoning text application (ULURP No. N 170425 (A) ZRY; see Appendix H) that addresses issues raised after issuance of the DEIS. This amended application is assessed as the A-text Alternative in the FEIS.
- A new alternative was added to the FEIS ("Modified A-text Alternative") that considers potential modifications to the proposed amended zoning text application (ULURP No. N 170425 (A) ZRY), which would allow new self-storage uses as-of-right in Designated Areas in M districts, provided that on large lots, floor space amounting to at least 50 percent of the lot area is set aside for more job-intensive industrial uses.

As described in Chapter 2, "Analytical Framework," the Proposed Action establishes a new CPC Special Permit for self-storage development which would be applied citywide in the proposed Designated Areas in M districts. Per CEQR guidelines, since the Proposed Action has broad applicability, it is difficult to predict the universe of sites where development would be affected by the Proposed Action. The Proposed Action is analyzed in this FEIS as a, "generic 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.

Per CEQR guidelines, impacts of alternatives do not need to be assessed at the same level of detail as those of the proposed project. In areas where no significant impact of the proposed project was identified, a qualitative assessment is sufficient. However, where a significant impact of the proposed project has been identified, it is usually appropriate to describe the alternative so that a comparison may be meaningful. The level of analysis provided depends on a preliminary assessment of project impacts as determined by the analysis connected with the appropriate tasks.

## **23.2. PRINCIPAL CONCLUSIONS**

### **23.2.1. No Action Alternative**

The No Action Alternative examines future conditions within the Project Area, but assumes the absence of the Proposed Actions (i.e., none of the discretionary approvals proposed as part of the Proposed Actions would be adopted). Under the No Action Alternative, existing zoning would remain in the area affected by the Proposed Actions and new storage could continue to locate as-of-right within Designated Areas in M Districts.

Under the Proposed Action, by the build year, it is anticipated 11 new self-storage facilities would be built in Designated Areas and 71 new self-storage would be developed in in M and C8 districts outside Designated Areas. Under the No-Action Alternative, 20 new self-storage facilities would be located in Designated Areas and 66 would be located in C8 and M districts outside Designated Areas. In addition, under the No-Action Alternative, approximately 9,600 acres of land would be available and viable for as-of-right self-storage development, compared with approximately 4,900 acres under the Proposed Action.

Although the No-Action Alternative would potentially eliminate the impact on the self-storage, this alternative would not meet the Proposed Action's objective of maintaining suitable sites for more job-intensive industrial uses and encouraging higher job densities in the city's strongest industrial areas.

### **23.2.2. Smaller Sites Alternative**

Another possible alternative is to continue to allow new self-storage development as-of-right on smaller sites. For the purposes of this analysis, a small site is defined as having a lot area of 20,000 sq. ft. or less, which is significantly smaller than the median lot size of 40,000 sq. ft. of recent self-storage development within Designated Areas.

Under the Proposed Action, by the build year, it is anticipated 11 new self-storage facilities would be built in Designated Areas and 71 new self-storage would be developed in in M and C8 districts outside Designated Areas. Under the Smaller Sites Alternative, it is assumed that the number of new self-storage facilities developed in Designated Areas would be higher since an as-of-right option for self-storage development would remain, but somewhat less than the 20 additional facilities expected in the

No-Action Alternative since some self-storage facilities may choose not to build on smaller, less optimal development sites. Some additional development may also shift to more optimal sites in M and C8 districts outside of Designated Areas, but, as in the Proposed Action, this would be expected to be a very small number of sites.

An analysis of land use and employment trends on potential redevelopment sites on lots smaller than 20,000 sq. ft. indicates that these sites are actively used by a diverse range of businesses, the majority of which remain industrial in character. As described below, although parking and vacant sites are often considered prime sites for redevelopment, these sites also support significant employment, an indication that many largely unimproved sites remain in active use by businesses for vehicle parking and storage of materials.

Overall, given the above-described trends, it is evident that smaller sites also serve as an important siting opportunity for industrial companies. Therefore, an alternative that would continue to allow as-of-right construction of self-storage on smaller sites (the Smaller Sites Alternative) would not be fully consistent with the Proposed Action's purpose and need to maintain and maximize siting opportunities for more job-intensive industrial sectors.

In addition, because most recent self-storage development occurs on lots larger than 20,000 sq. ft. the Smaller Sites Alternative would not provide a full range of siting opportunities for self-storage and thus would only partially mitigate significant adverse impacts on the self-storage industry. Since some additional development may still shift to more optimal development sites outside Designated Areas, the Small Sites Alternative would not mitigate the potential for significant adverse impacts related to archaeology and hazardous materials.

### 23.2.3. A-text Alternative

The Mixed Use Alternative presented in the DEIS has been revised and expanded upon in response to comments on the DEIS and is presented as the "A-text Alternative" in the FEIS. The A-text Alternative considers modifications to the Proposed Action that would allow new self-storage uses in Designated Areas as-of-right, provided that at least 20,000 square feet of ground floor space is set aside for more job-intensive industrial uses.

Since the issuance of the DEIS, DCP has prepared and filed an amended zoning text application that expands upon the Mixed Use Alternative presented in the DEIS. The amended application, filed as ULURP application N 170425 (A) ZRY, consists of modifications to the Proposed Action to permit self-storage facilities as-of-right in Designated Areas in M districts, provided that a minimum specified amount of ground-floor space is set aside for more job-intensive industrial uses. The industrial ground floor requirement could be modified or waived by applying for a City Planning Commission Special Permit. The allowance would be limited to self-storage developments including ground floor industrial uses of no less than 20,000 square feet, where the industrial ground floor space would be limited to occupancy by use groups 11A, 16A, 16B, 16D (excluding self-storage), 17 and 18; art studios in UG 9A; and/or photographic or motion picture production studios, radio or television studios in UG 10A. The analysis assumes separate off-street loading docks and entrances for the self-storage and ground floor

industrial uses. The changes proposed under the A-text Alternative are in response to views expressed during the public review process, and would reduce the potential for significant adverse impacts on the self-storage industry, while still supporting the Proposed Action's goal of maintaining adequate future siting opportunities for more job-intensive industrial uses in the Designated Areas.

Under the Proposed Action, by the build year, it is anticipated 11 new self-storage facilities would be built in Designated Areas and 70 new self-storage would be developed in in M and C8 districts outside Designated Areas. Under the A-text Alternative, it is expected that by the Build Year, up to 20 sites in Designated M Areas would be redeveloped with mixed industrial and self-storage developments, but the continued requirements for a Special Permit for new self-storage development that does not meet the standards described above could result in somewhat fewer sites than would be expected in the No-Action Alternative. Some additional development may also shift to more optimal sites in M and C8 districts outside of Designated Areas, but, as in the Proposed Action, this would be expected to be a very small number of sites.

Based on conclusions of a mixed-use feasibility analysis described below, the type of industrial tenants most compatible for such space would be smaller scale, less truck-dependent manufacturing uses. Therefore, land use conditions in the future with the A-text Alternative are likely to include more new space for manufacturing uses, but potentially fewer sites available to larger scale construction, wholesale and transportation businesses.

Although the A-text Alternative would not maintain as much flexibility in siting opportunities for larger industrial businesses as the Proposed Action, it could create new space for smaller scale industrial and light manufacturing businesses, and would therefore partly meet the purpose and need of the Proposed Action. Additionally, by providing additional siting opportunities for self-storage, this alternative would partially mitigate the significant adverse impacts of the Proposed Action on the self-storage industry. Since some additional development may still shift to more optimal development sites outside Designated Areas, the A-text Alternative would not mitigate the potential for significant adverse impacts related to archaeology and hazardous materials.

#### **23.2.4. Modified A-text Alternative**

The Modified A-Text Alternative considers potential modifications for consideration by the City Planning Commission that would modify the amended zoning text application (ULURP application N 170425 (A) ZRY). In response to comments received on the DEIS, a Modified A-text Alternative was developed to increase the feasibility of mixed-use self-storage and industrial development, with the objective of addressing public comment and further reducing significant adverse business impacts on the self-storage industry. The Modified A-text Alternative would allow for some flexibility in the placement of the required industrial space and considers rules that are appropriate to lots of all sizes. The Modified A-text Alternative would permit self-storage development as-of-right on large lots, considered as lots larger than or equal to 25,000 SF, provided that an industrial floor space component equivalent to 50 percent of the lot area is provided. On small lots, considered as lots smaller than 25,000 square feet, floor space equivalent to 50 percent of the lot area may be provided in the form of large self-storage units, defined as units equal to or larger than 100 square feet, because units of these sizes are typically rented by businesses.

The Modified A-text Alternative furthermore changes the findings of the Special Permit, basing them on financial hardship. Accordingly, a BSA Special Permit could modify, reduce or waive the industrial space requirement.

This as-of-right framework is less restrictive and presents less of a disincentive to the development of self-storage development facilities than the Proposed Action. It also provides more options for the siting of self-storage facilities compared to the A-text Alternative, because it offers provisions for the siting of self-storage facilities on small sites and includes provisions that make the locational requirements associated with the industrial space more flexible. Accordingly, it is expected that the Modified A-Text Alternative would reduce, but not fully mitigate, the Proposed Action’s potential for a significant adverse environmental impacts on Socioeconomic Conditions related to the self-storage industry. Since some additional development may still shift to more optimal development sites outside Designated Areas, the Modified A-text Alternative would not mitigate the potential for significant adverse impacts related to archaeology and hazardous materials.

### **23.3. NO ACTION ALTERNATIVE**

#### **23.3.1. Description of Alternative**

The No Action Alternative examines future conditions within the Project Area, but assumes the absence of the Proposed Actions. Under the No Action Alternative, there would be no change to zoning and self-storage facilities could continue to locate as-of-right within Designated Areas. The No Action Alternative compared to the With Action Scenario could result in five fewer self-storage facilities overall by 2027, with nine fewer in Designated Areas, and four more in M and C8 districts outside of the Designated Areas. In the No Action Alternative, these four additional self-storage facilities would not be relocated to M and C8 districts outside of the Designated Areas.

In addition, under the No-Action Alternative, approximately 9,600 acres of land would be available and viable for as-of-right self-storage development, compared with approximately 4,900 acres under the Proposed Action.

The significant adverse impacts related to Socioeconomic Conditions, archaeology, and hazardous materials that would occur with the Proposed Actions would not occur with the No Action Alternative.

However, as described in the analysis of Representative Examples in Chapter 3, “Land Use, Zoning and Public Policy,” the types of sites anticipated to be developed for self-storage in the No-Action Condition are expected to preclude potential siting opportunities for more job-intensive industrial businesses that have had difficulty finding sites or opportunities to expand (as described in Chapter 1, “Project Description”). While certain non-industrial developments could continue to be developed on some sites suitable for self-storage, the analysis of recent development, land use, and employment trends indicates that industrial uses provide the primary demand for sites that would be developed as self-storage in Designated Areas in M districts – and particularly for larger sites. In contrast with the Proposed Action, this alternative will not allow some existing industrial businesses to remain in place, or new industrial businesses to open. As illustrated in the analysis of Representative Examples, under the Proposed Action as-of-right development opportunities, as well as existing uses, would result in

higher expected industrial employment densities. Any non-industrial development that may occur would also be expected to support higher job densities compared with self-storage, while also providing needed services and amenities to nearby residents and workers.

Therefore, although the No-Action Alternative would potentially eliminate the impact on the self-storage, this alternative would not meet the Proposed Action's objective of maintaining suitable sites for industry and encouraging higher job densities in the city Industrial Business Zones.

### **23.3.2. Socioeconomic Conditions**

Under the No Action Alternative, it is anticipated that 15 sites would be redeveloped and 5 sites would undergo conversion to self-storage. Development or conversions on these 20 sites would result in increased siting opportunities for self-storage. As described in Chapter 3, "Land Use, Zoning and Public Policy," almost 1,700 sites are suitable for development or conversion to self-storage in Designated Areas, based on recent development trends in the industry. The sites are widely dispersed throughout the Designated Areas and, consequently, it is not possible to predict with certainty where self-storage would be likely to occur in the No-Action Alternative. An assessment of land use, building and employment characteristics provided in Chapter 3 provides information to determine likely effects. The following summarizes the potential socioeconomic effects of the No Action Alternative as compared with those of the Proposed Actions.

#### ***23.3.2.1. Adverse Effects On Specific Industries***

The Proposed Action could potentially result in significant adverse impacts on the self-storage industry since the proposed restriction would substantially limit available siting opportunities for a rapidly growing sector. Unlike the Proposed Action, the No Action Alternative would maintain a reservoir of sites suitable for new self-storage development, enabling the industry to meet growing demand for its services. Therefore, the No-Action Alternative is not likely to result in impacts on a specific industry, compared with the With-Action scenario.

However, as illustrated in the description of Representative Examples in Chapter 2, "Analysis Framework," sites expected to be developed for self-storage in the No-Action Condition are expected under the Proposed Action to provide potential siting opportunities for more job-intensive industrial businesses (as described in Chapter 1, "Project Description"). While certain non-industrial developments could continue to be developed on some sites suitable for self-storage, the analysis of recent development, land use and employment trends indicates that industrial uses provide the primary demand for sites that would be developed for self-storage in Designated Areas in M districts – and particularly for larger sites. In contrast with the Proposed Action, this alternative will not allow some existing industrial businesses to remain in place, or new industrial businesses to open. As described in the analysis of Representative Examples, under the Proposed Action, as-of-right development opportunities, as well as existing uses, would result in higher expected industrial employment densities. Any non-industrial development that may occur would also be expected to support higher job densities compared with self-storage, while also providing needed services and amenities to nearby residents and workers.

Therefore, although the No-Action Alternative would potentially eliminate the impact on the self-storage industry, this alternative would not meet the Proposed Action's objective of maintaining suitable sites for more job-intensive industrial uses in the city's strongest industrial areas.

### **23.3.3. Historic and Cultural Resources**

The Proposed Action has the potential to result in significant adverse impacts to archaeological resources as it may result in deeper in-ground disturbance. While the potential impacts of the provisions are expected to be limited and unlikely, it is not possible to conclude where and to what extent additional in-ground disturbance might occur. As such, the possibility of significant impacts on archaeological resources cannot be eliminated.

Since the No Action Alternative compared to the Proposed Action is expected to result in less new construction or conversion in M and C8 districts outside of Designated Areas, the potential significant adverse impacts related to archaeology that could be expected under the Proposed Action would not be expected to occur in the No Action Alternative.

### **23.3.4. Hazardous Materials**

The Proposed Action itself is not expected to induce development on sites where development would not have otherwise been possible thereby limiting the potential for additional in-ground disturbance. It is also not anticipated to increase building footprints. It could, however, result in deeper excavation compared to the No Action scenario as the building heights under the With Action condition are anticipated to be slightly taller. Given the land uses in the area, and their associated potential for hazardous materials, this would result in the potential for significant adverse hazardous materials impacts. These potential impacts would be unmitigated.

Since the No Action Alternative compared to the Proposed Action is expected to result in less new construction or conversion in M and C8 districts outside of Designated Areas, the potential significant adverse impacts related to archaeology that could be expected under the Proposed Action would not be expected to occur in the No Action Alternative.

### **23.3.5. Other Analysis Categories**

In terms of impacts for other analysis categories, in the No Action Alternative, given that this is a city-wide action, it is difficult to forecast additional possible impacts. However, since neither the Proposed Action nor the No-Action Alternative would be expected to induce new development or significantly alter the amount, density, form, or type of new development expected by the build year, the effects of the No-Action Alternative on other technical areas would be expected to be similar to the Proposed Action, and the potential for additional significant adverse impacts would be unlikely.

#### 23.4. SMALLER SITES ALTERNATIVE

The analysis considers continuing to allow new self-storage development as-of-right on smaller sites. For the purposes of this analysis, a small site is defined as having a lot area in PLUTO of 20,000 sq. ft. or less, which is significantly smaller than the median lot size of 40,000 sq. ft. of recent self-storage development within Designated Areas. Smaller sites are viewed as less optimal for more job-intensive industrial uses, which tend to be horizontally arranged and thus need large sites.

In order to assess the potential effects of the Smaller Sites Exemption Alternative, a high level “soft site” analysis was conducted to identify a reasonable universe of sites for redevelopment with self-storage. Sites were identified using the Primary Land Use Tax Lot Output (PLUTO™ 16v2) data, which consists of extensive land use, geographic and zoning data at the tax lot level derived from data files maintained by several New York City agencies, and was performed in an ArcGIS environment. Sites were considered “soft” if they met the following criteria:

- Not currently classified as a residential, public facility or open space land use;
- Tax lots of 5,000 sq. ft. or larger;
- Tax lots developed to less than half the permitted commercial floor area ration (FAR) were considered soft for new construction;
- Tax lots with existing buildings built prior to 1961 and in excess of the permitted commercial, and containing no residential floor area were considered soft for conversion.

As shown in Figure 1, 3,200 of the approximately 6,500 tax lots of 20,000 sq. ft. are underbuilt and could be considered candidates for new construction. Another 407 sites are considered potential candidates for conversion.

Given the large number of potential development sites under 20,000 sq. ft., it is expected that more self-storage facilities could get developed under this Alternative when compared with the Proposed Action. Under the Proposed Action, by the build year, it is anticipated the 11 new self-storage facility would be developed within Designated Areas and 71 new self-storage would be developed in in M and C8 districts outside Designated Areas. Under the Smaller Sites Alternative, it is assumed that the number of new self-storage facilities developed in Designated Areas would be higher since an as-of-right option would remain, but somewhat less than the 20 additional facilities expected in the No-Action Alternative since some self-storage facilities may choose not to build on smaller, less optimal development sites. Some additional development may also shift to more optimal sites in M and C8 districts outside of Designated Areas, but, as in the Proposed Action, this would be expected to be a very small number of sites.

Tax Lots 20,000 sq. ft. or less within Designated Areas	
Soft site status	Total tax lots
Conversion	407
New Construction	3,263
Not Soft	2,820



**Grand Total**

**6,490**

Figure 1: Soft Site Analysis

Since the universe of potential sites is quite large, sites for new construction were analyzed further according to four different lot area thresholds to distinguish between relatively smaller and large sites. The distribution of sites across the different size categories are shown in Figure 2 below. The sites were grouped as follows:

- **0-4,999 sq. ft.:** The median lot size in the universe was rather small – approximately 5,000 sq. ft. All sites below the median were grouped together and would likely be considered too small for redevelopment to self-storage. Almost 1,700 of 3,263 sites fell into this category.
- **5,000-9,999 sq. ft.:** Approximately 770 sites (24 percent) were in this group, one standard deviation above the median.
- **10,000-14,999 sq. ft.:** Approximately 467 sites (14 percent) were in this group, two standard deviations above the median.
- **15,000 to 20,000 sq. ft.:** Approximately 345 sites (11 percent) were in this group, three standard deviations above the median.

**New construction soft sites, by size categories**

<b>Lot area of soft sites in Designated Areas</b>	<b>Total tax lots</b>
0-4,999 sq. ft.	1,684
5,000 to 9,999 sq. ft.	767
10,000 to 14,999 sq. ft.	467
15,000 to 20,000 sq. ft.	345
<b>Grand Total</b>	<b>3,263</b>

Figure 2: Soft Site by Size

The universe of potential development sites under 20,000 sq. ft. thus includes conversions and new construction on tax lots 5,000 sq. ft. or larger. As shown in Figure 3 below, there are just over 1,900 tax lots meeting these criteria in Designated Areas, of which 328 are potential conversion candidates and 1,579 are possible opportunities for new construction.

**Soft sites on tax lots 5,000 to 20,000 sq. ft. in Designated Areas**

<b>Conversion</b>	<b>288</b>
<b>New Construction</b>	<b>1,579</b>
5,000 to 9,999	767

10,000 to 14,999	467
15,000 to 20,000	345
<b>Grand Total</b>	<b>1,867</b>

Figure 3: Soft sites in Designated Areas |

The universe of approximately 1,900 sites are currently used by a variety of different land uses (see Figure 4, below). The vast majority (80 percent) of sites for conversion are currently classified as either industrial or manufacturing. These buildings represent about 15 percent of the total universe of soft sites.

Among new construction sites, which comprise approximate 85 percent of the total soft sites, approximately 30 percent are industrial and manufacturing, 25 percent are used for parking, and almost 15 percent are vacant. Land use on the remaining 30 percent of new construction sites were unknown, transportation and utilities or commercial and office uses.

**Existing land use on potential sites, by size threshold (sq. ft.)**

	5,000 to 9,999	10,000 to 14,999	15,000 to 20,000	Tax lots	% of total
<b>Conversion</b>	<b>137</b>	<b>81</b>	<b>70</b>	<b>288</b>	<b>15.4%</b>
Industrial and Manufacturing	110	64	56	230	12.3%
Commercial & Office Building	16	11	11	38	2.0%
Parking Facilities	8	3	2	13	0.7%
Transportation & Utility	1	3	1	5	0.3%
Unknown	2			2	0.1%
<b>New Construction</b>	<b>767</b>	<b>467</b>	<b>345</b>	<b>1,579</b>	<b>84.6%</b>
Industrial and Manufacturing	187	142	128	457	24.5%
Parking Facilities	226	120	58	404	21.6%
Vacant	145	79	55	279	14.9%
Unknown	129	58	41	228	12.2%
Transportation & Utility	40	32	35	107	5.7%
Commercial & Office Building	40	36	28	104	5.6%
<b>Grand Total</b>	<b>904</b>	<b>548</b>	<b>415</b>	<b>1,867</b>	<b>100.0%</b>

Figure 4: Land use on potential sites

Using geocoded microdata from the Quarterly Census of Employment and Wages (QCEW) from the third quarter of 2015, the Department can estimate the amount of wage and salary employment occurring on soft sites of less than 20,000 sq. ft. As shown in Figure 5, below, these soft supported almost 24,000 jobs in 2015, with both potential sites for both conversions and new construction supporting a significant number of jobs. When analyzed by land use categories, industrial and

manufacturing properties, which includes warehouses as well as loft buildings, supported the most jobs – almost 12,000. Notably, commercial and office buildings support most of the jobs in conversion candidates, an indication that some multi-story buildings have already been converted to office-based uses. Although parking and vacant sites are often considered prime sites for redevelopment, these sites still supported 3,700 jobs in 2015, an indication that many vacant sites remain in active use by businesses.

**Employment on soft sites, by land use**

	Conversion	New Construction	Total
Commercial & Office Building	6,701	1,202	7,903
Industrial and Manufacturing	4,493	6,688	11,181
Transportation & Utility	160	338	498
Parking Facilities	D*	1,247	1,387
Vacant	N/A	2,314	2,314
Unknown	D*	266	266
<b>Grand Total</b>	<b>11,494</b>	<b>12,055</b>	<b>23,549</b>

Figure 5: Employment by land use on soft sites

\*D = Undisclosed due to confidentiality screening

Source: QCEW 2015 (3Q)

Additional analysis of the QCEW provide a representative profile of the types of economic and land use activity occurring on potential soft sites. As shown below in Figure 6, over 1,300 companies currently operation on the potential sites, supporting almost 24,000 jobs. The largest sector in term of employment is the administrative, support and waste management services, employing 5,786 works, primarily in security and waste management businesses. Industrial<sup>1</sup> companies in construction, manufacturing, transportation and wholesale made up the next four largest sectors, collectively support almost 12,000 jobs. Nonindustrial sectors comprised approximately 9,300 of the 24,000 jobs on smaller soft sites in 2015. These jobs were in a diversity of sectors, with health care and social assistance supporting the most jobs at 1,402.

---

<sup>1</sup> Sectors defined as industrial for the purposes of this analysis include construction, manufacturing, transportation and warehousing and wholesale trade. Additional subsectors with typical activities and processes similar to industrial land uses were also included in the definition of industrial. These subsectors include: waste management and remediation, motion picture and sound recording studios, repair and maintenance, commercial and industrial equipment rental, building materials dealers, motor vehicle parts dealers and nonstore retailers.

**Employment on soft sites by sector**

<b>Sector</b>	<b>Employment</b>	<b>Firms</b>
Administrative, Support & Waste Management Services	5,786	52
Construction	4,040	203
Manufacturing	3,537	157
Transportation and Warehousing	2,281,5	59
Wholesale Trade	1,968	227
Health Care and Social Assistance	1,402	16
Retail Trade	1,136	132
Other Services (except Public Administration)	847	131
Accommodation and Food Services	817	36
Professional, Scientific, and Technical Services	659	62
Real Estate and Rental and Leasing	489	80
Unclassified	155	108
Educational Services	112	6
Information	106	8
Finance and Insurance	104	18
Management of Companies and Enterprises	D	D
Arts, Entertainment, and Recreation	41	12
Agriculture, Forestry, Fishing and Hunting	D	D
<b>Industrial Sectors</b>	<b>14,200</b>	<b>846</b>
<b>Nonindustrial Sectors</b>	<b>9,349</b>	<b>464</b>
<b>Grand Total</b>	<b>23,549</b>	<b>1,310</b>

Figure 6: Employment by sector on soft sites

\*D = Undisclosed due to confidentiality screening

Source: QCEW 2015 (3Q)

An analysis of land use and employment trends on potential redevelopment sites on lots smaller than 20,000 sq. ft. indicates that these sites are actively used by a diverse range of businesses, the majority of which remain industrial in character. As described above, although parking and vacant sites are often considered prime sites for redevelopment, these sites also supported significant employment, an indication that many vacant sites remain in active use by businesses.

Overall, given the above-described trends, it is evident that smaller sites also serve as important siting opportunities for industrial companies. Therefore, an alternative that would continue to allow as-of-right construction of self-storage on smaller sites (the Smaller Sites Alternative) would not be fully

consistent with the Proposed Action's purpose and need to maintain siting opportunities for more job-intensive industrial sectors.

#### **23.4.1. Socioeconomic Conditions**

Under the Smaller Sites Alternative, it is assumed that the number of new self-storage facilities developed in Designated Areas would be higher since an as-of-right option would remain, but somewhat less than the 20 additional facilities expected in the No-Action Alternative since some self-storage facilities may choose not to build on smaller, less optimal development sites. Some additional development may still shift to more optimal sites in M and C8 districts outside of Designated Areas, but, as in the Proposed Action, this would be expected to be a very small number of sites.

As described in Chapter 3, "Land Use, Zoning and Public Policy," almost 1,700 sites are suitable for development or conversion to self-storage in Designated Areas, based on recent development trends in the industry. The sites are widely dispersed throughout the Designated Areas and, consequently, it is not possible to predict with certainty where self-storage would be likely to occur in the No-Action Alternative. An assessment of land use, building and employment characteristics provided in Chapter 3 provides information to determine likely effects. The following summarizes the potential socioeconomic effects of the Small Sites Alternative as compared with those of the Proposed Actions.

##### ***23.4.1.1. Adverse Effects On Specific Industries***

The Proposed Action could potentially result in significant adverse impacts on the self-storage industry since the proposed restriction would substantially limit available siting opportunities for a rapidly growing sector. Unlike the Proposed Action, the Small Sites Alternative would maintain a reservoir of small sites available for new as-of-right self-storage development, partially enabling the industry to meet growing demand for its services. Therefore, the Small Sites Alternative is less likely to result in adverse impacts on a specific industry, compared with the With-Action scenario.

Although the Small Sites Alternative would potentially lessen the impact on the self-storage industry, this alternative would not meet the Proposed Action's objective of maintaining suitable sites for more job-intensive industrial uses in the city's strongest industrial areas.

#### **23.4.2. Historic and cultural Resources**

The Proposed Action has the potential to result in significant adverse impacts to archaeological resources as it may result in deeper in-ground disturbance. While the potential impacts of the provisions are expected to be limited and unlikely, it is not possible to conclude where and to what extent additional in-ground disturbance might occur. As such, the possibility of significant impacts on archaeological resources cannot be eliminated.

Since some additional development may still shift to more optimal development sites outside Designated Areas, the small sites alternative would not mitigate the potential for significant adverse impacts related to archaeology.

### 23.4.3. Hazardous Materials

The Proposed Action itself is not expected to induce development on sites where development would not have otherwise been possible thereby limiting the potential for additional in-ground disturbance. It is also not anticipated to increase building footprints. It could, however, result in deeper excavation compared to the No Action scenario as the building heights under the With Action condition are anticipated to be slightly taller. Given the land uses in the area, and their associated potential for hazardous materials, this would result in the potential for significant adverse hazardous materials impacts. These potential impacts would be unmitigated.

Since some additional development may still shift to more optimal development sites outside Designated Areas, the small sites alternative would not mitigate the potential for significant adverse impacts related to hazardous materials.

### 23.4.4. Other Analysis Categories

In terms of impacts for other analysis categories, in the Smaller Sites Alternative, given that this is a city-wide action, it is difficult to forecast additional possible impacts. However, since neither the Proposed Action nor the No-Action Alternative would be expected to induce new development or significantly alter the amount, density, form, or type of new development expected by the build year, the effects of the No Action Alternative on other technical areas would be expected to be similar to the Proposed Action, and the potential for significant additional adverse impacts would be unlikely.

## 23.5. "A-TEXT" (MIXED USE) ALTERNATIVE

### 23.5.1. Description of Alternative -- A-text Alternative

The "A-text" Mixed Use Alternative considers modifications to the Proposed Action that would allow new self-storage uses in Designated Areas as-of-right, provided that at least 20,000 square feet of ground-floor space is set aside for more job-intensive industrial uses.

Since the issuance of the DEIS, DCP has prepared and filed an amended zoning text application that expands upon the Mixed Use Alternative presented in the DEIS. The A-Text Alternative is consistent with the Mixed-Use Alternative included in the DEIS, but considers additional clarifications and amendments to the underlying zoning in order to facilitate the co-location of self-storage and industrial uses in Designated Areas in M Districts. The amended application, filed as ULURP application N 170425 (A) ZRY, consists of modifications to the Proposed Action to permit self-storage facilities as-of-right in Designated Areas in M districts, provided that a minimum specified amount of ground-floor space is set aside for more job-intensive industrial uses. The industrial ground floor requirement could be modified or waived by applying for a City Planning Commission Special Permit, as described in the Proposed Action.

The analysis assumes that new self-storage facilities would remain permitted as-of-right in Designated Areas in M districts, under the condition that at least 20,000 sq. ft. of the ground floor be dedicated to specified semi-industrial, industrial and manufacturing uses. The industrial ground floor requirement

could be modified or waived by applying for a City Planning Commission Special Permit. The industrial ground floor would be limited to occupancy by use groups 11A, 16A, 16B, 16D (excluding self-storage), 17 and 18; art studios in UG 9A; and/or photographic or motion picture production studios, radio or television studios in UG 10A. The analysis assumes separate off-street loading docks and entrances for the self-storage and ground floor industrial uses. **Several modifications of floor area, off-street parking and off-street loading provisions are also proposed: those would facilitate the proposed set-aside of ground-floor space for industrial use. These are described below.**

The proposed requirements for the mixed-use building are informed by the draft conclusions of a study regarding the design feasibility of mixed use industrial programs. This analysis was conducted between fall 2016 and spring 2017 by the architecture firm Gensler on behalf of the DCP and the New York City Economic Development Corporation (EDC). Intended to inform policy development at DCP and EDC, the study assessed the operational and architectural compatibility of mixing industrial and nonindustrial uses in a variety of site conditions in New York City. The study also assessed the financial feasibility of different mixed use industrial models based on market rents and construction costs of architectural prototypes. Compatible mixes of uses were identified based on findings about industrial business needs and operational practices that were informed by interviews with industrial businesses, real estate brokers and developers in several different industrial markets in New York City.

After identifying compatible uses, the study considered architectural compatibility. This exercise relied heavily on interviews with business owners and property owners to understand the architectural requirements necessary to support industrial activity including characteristics like space size and column spans, features such as freight elevators, as well as major environmental concerns and transportation access. These requirements directly impact the architectural feasibility of mixed use industrial programs. This second filter further reduced the number of industrial businesses that are compatible with residential and commercial activity to five typologies. These customized industrial categories included: advanced manufacturing, creative industrial, food manufacturing with retail, food manufacturing without retail and wholesale.

Ten sites were selected to test market conditions and to cover a variety of expected lot configurations and sizes ranging between 10,500 sq. ft. and 83,000 sq. ft. Different use combinations were considered to test a variety of potential scenarios that considered different site conditions, business space needs, operational considerations, construction costs, and financial sensitivities. One prototype considered a mixed self-storage and creative industrial (as defined above) development on a 19,500 sq. ft. site in the Port Morris section of the Bronx. Brokers, developers and businesses based in Port Morris interviewed for the study reported that new companies moving into the market are appropriating space for new uses including breweries, distributors and production space. The available building stock is larger than in most study areas and there is a larger share of midsize industrial firms than in other markets.

Based on the business needs interviews, design feasibility analysis and financial modeling, the study provided the following conclusion with regard to a mixed industrial and self-storage development:

- Minimal land conflicts with industrial uses studied , although smaller sites could result in on-street parking by self-storage customers and may disrupt surrounding street traffic;
- Most effective use to cross subsidize industrial development;

- Requires separate loading docks for the self-storage and industrial uses and separate elevators, which increases costs, but rents can absorb the additional construction cost;
- Can occupy upper or lower floors to accommodate needs of industrial business;
- Flexible design fits with residential and office floorplates and can be converted to another use in the future;
- Ideally occupies a footprint of at least 25,000 – 30,000 sf. The lot should have at least 150' street frontage to efficiently organize two loading docks and two building lobbies next to each other.

Taking into account the results of this draft study, the A-text Alternative proposes the following zoning changes applicable to the development or enlargement of the self-service storage portion of the building:

- Required depth of loading berths for self-storage use is 37 feet, not 50 feet. This reflects the fact that self-storage users do not typically utilize tractor-trailer trucks that require a longer loading depth. The Proposed Action includes a definition for self-storage. In so doing, its loading needs can be distinguished from other wholesale and distribution uses. Self-storage customers are typically limited to small two-axle trucks that can be driven without special licenses. Those vehicles can easily be accommodated in shorter loading berths of 37 feet.
- For existing buildings, a change of use to self-storage from another use in Use Group 16D shall not be considered a change of use for purposes of applying the requirements of Section 44-52 (Required Accessory Off-Street Loading Berths). This maintains the current situation, in which self-storage is not separately defined and thus, conversions to self-storage are not considered a change of use.

The A-text Alternative furthermore proposes the following zoning changes applicable to the ground floor industrial space in the case of development or enlargement of self-storage facilities in Designated Areas in M districts

- The required industrial space could be occupied by a list of industrial uses including:
  - Use Group 9A           only art studios
  - Use Group 10A       only photographic or motion picture production studios, radio or television studios
  - Use Group 11A       as specified in Section 32-20;
  - Use Group 16A       as specified in Section 32-25;
  - Use Group 16B       as specified in Section 32-25;
  - Use Group 16D       as specified in Section 32-25, excluding moving or storage offices and warehouses that are self-service storage facilities
  - Use Group 17         as specified in Section 42-14;
  - Use Group 18         as specified in Section 42-15;

The added uses in Use Groups 9A, 10A, 11A, 16A and 16B are more inclusive than those specified in the DEIS Mixed-Use Alternative, but are all uses that are currently permitted as-of-right in M districts. Including those uses, which are also considered industrial uses, makes the revised Mixed-



Use Alternative more consistent with other provisions of the Zoning Resolution and will facilitate administration of this alternative.

- In M1-1 districts, up to 20,000 SF of the required industrial floor area may exceed the 1.0 FAR cap in underlying zoning. This will permit a wider range of practical lot sizes for the mixed-use alternative in these low-FAR districts. (The DEIS prototype on p. 23-17 has a lot size of 60,000 sf, half a typical New York City block. This is larger lot than average in many industrial areas). M1 -1 districts already allow FARs greater than 1.0 for enlargements of existing manufacturing buildings (ZR Section 43-121) and for community facility uses (ZR Section 43-122).
- The floor-to-ceiling height of the ground floor industrial space shall be at least 15 feet, and one third of the industrial space shall have floor-to-ceiling heights of at least 23 feet. The portion of the industrial space that has a 23-foot ceiling would be expected to be a single story. Such clear heights are a necessity for many industrial businesses.
- In M1-1, M1-2, M1-4, M2-1, M2-3, M3-1, M3-2 districts, the number of required off-street loading berths shall instead be those specified for M1-3, M1-5, M1-6, M2-2 and M2-4 districts. This effectively waives the required second loading berth should the industrial space exceed 25,000 sq. ft., and reflects the practical difficulty of providing an adequately sized ground floor industrial space, multiple 50-foot-deep loading bays for the industrial use, and ground floor loading and lobby facilities for a self-storage facility. The loading berth requirements applicable to the ground floor industrial space are thus:

<b>Floor Area (in square feet)</b>	<b>Required Berths</b>
<u>First 15,000</u>	<u>None</u>
<u>Next 25,000</u>	<u>1</u>
<u>Next 40,000</u>	<u>1</u>
<u>Each additional 80,000 or fraction thereof</u>	<u>1</u>

- The parking for the required industrial use shall amount to 1 per 2,000 sq. ft. of floor area or 1 per 3 employees, whichever will require a lesser number of spaces - regardless of the underlying zoning requirements. This is, as a practical matter, the required amount of parking for a warehouse use and other uses in Parking Requirement Category G, as well as for a Use Group 17A contractor's establishment. Manufacturing uses and wholesale establishments, both important potential users of this required industrial space, are subject to higher practical parking requirements (1 space per 1,000 sf and one space per 600 sf, respectively) even though their employment densities are similarly low and auto use by workers is also expected to be low, given typical pay rates for nonsupervisory workers in these industries. As with loading, sizable amounts of required off-street parking cannot as a practical matter be accommodated, given other uses required on the ground floor level.

The proposed A-text Alternative would result in the following changes (see illustration) to the Mixed-Use examples as illustrated in the DEIS:

|

Alternate Example 1 with **Modification**

Lot Area: 60,000 sf

Zoning: M1-1

FAR: 1.0

Lot: Through

For any use that occupies the industrial ground floor, regardless of the underlying zoning, the parking for the required use shall be at the rate of 1 per 2,000 sf of floor area or 1 per 3 employees, whichever will require a lesser number of space.

Prototype 1	No-Action	With- Action
Lot Area (Square Feet)	60,000	60,000
Permitted FAR	1.0	1.0 +20,000 Square Feet
Permitted Development Rights (Square Feet)	60,000	80,000
Gross Floor Area (Square Feet)	60,000 + mechanical spaces + loading + cellar level not counted towards FAR	80,000 + mechanical spaces + loading + cellar level not counted towards FAR
Ground Floor/ Upper Story Height	23'/16'	23'/16'
Building Height	39'	39'
Number of Stories	2	2
Number of Loading Berths	3	3
Number of Parking Spaces Included	2	7 (max) equivalent to 21 employees at new parking rate

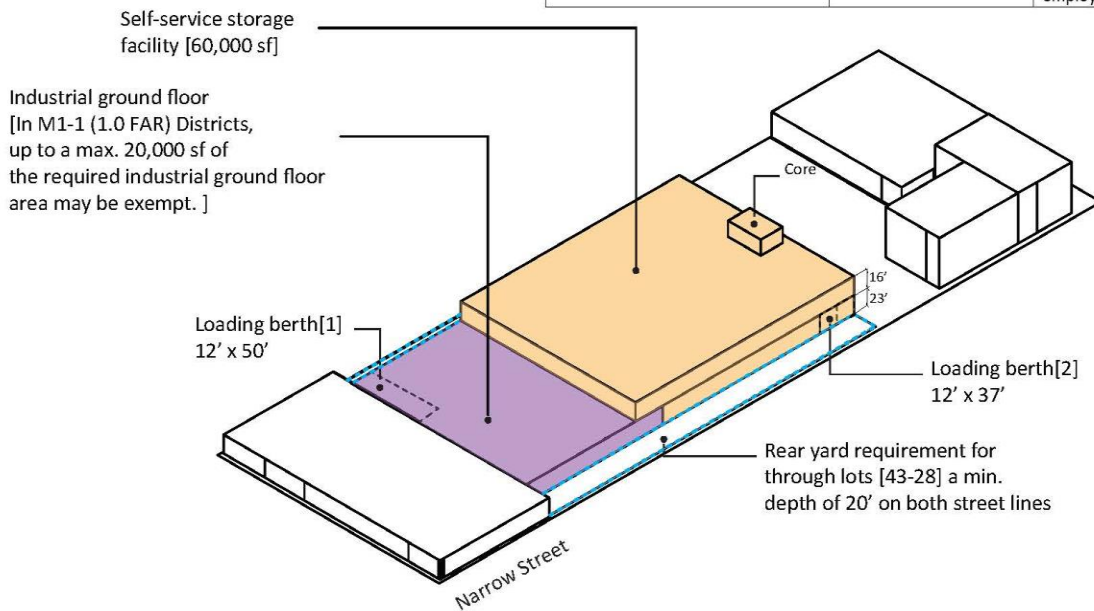


Figure 7: 3D Illustration of potential building typology proposed by the A-text Alternative

**Alternate Example 2 with Modifications**

Lot Area: 60,000 sf  
 Zoning: M1-5  
 FAR: 5.0  
 Lot: Through

Prototype 2	No-Action	With- Action
Lot Area (Square Feet)	60,000	60,000
Permitted FAR	5.0	5.0
Permitted Development Rights (Square Feet)	300,000	300,000
Gross Floor Area (Square Feet)	300,000 + mechanical spaces	300,000 + mechanical spaces
Ground Floor/ Upper Story Height	23'/16'	23'/16'
Building Height	39'	39'
Number of Stories	7	6
Number of Loading Berths	4	7
Number of Parking Spaces Included		7 (max) equivalent to 21 employees at new parking rate

For any use that occupies the industrial ground floor, regardless of the underlying zoning, the parking for the required use shall be at the rate of 1 per 2,000 sf of floor area or 1 per 3 employees, whichever will require a lesser number of space.

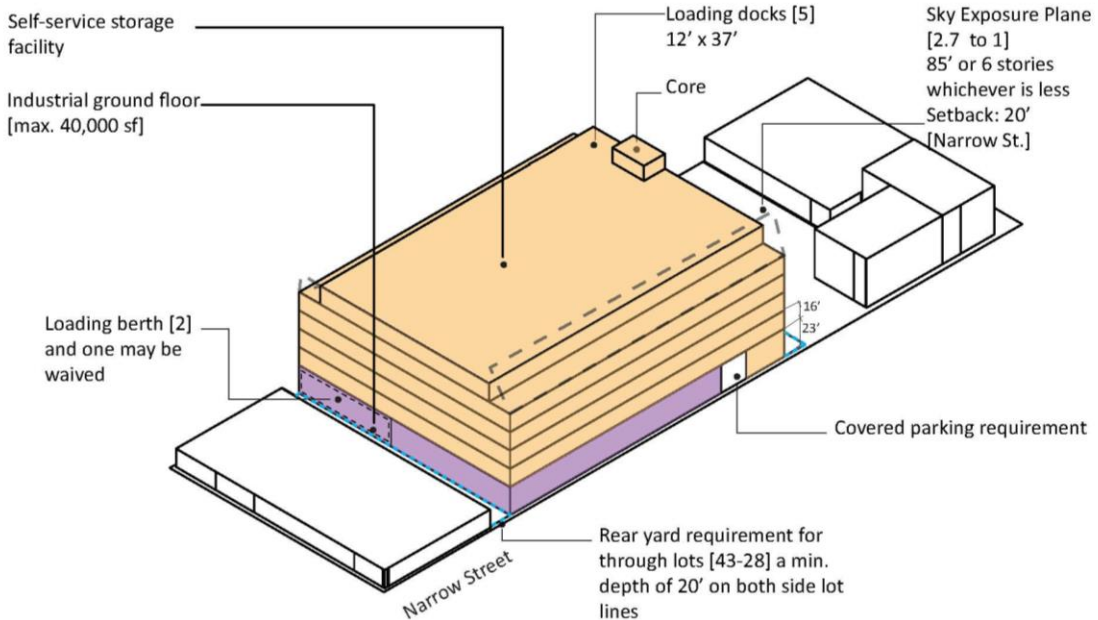


Figure 8: 3D Illustration of potential building typology proposed by the A-text Alternative

**23.5.2. Land Use, Zoning, and Public Policy:**

The A-text Alternative is likely to result in somewhat fewer new self-storage facilities than would be expected in the No-Action Alternative, since the required industrial ground floor space still represents an additional hurdle. However, it provides some additional siting opportunities for self-storage compared to the Proposed Action, by proposing an as-of-right framework with specific conditions for the siting of self-storage facilities in Designated Areas in M districts.

It is expected that sites that would be redeveloped with mixed self-storage and industrial developments would be larger sites of a minimum of 30,000 square feet, since providing a 20,000 square foot industrial space on the ground floor is likely impracticable on smaller sites. As described in the "Land Use, Zoning and Public Policy" Chapter, the sites which are suitable for mixed-use self-storage development are numerous and widely dispersed throughout the Designated Areas.

The majority of large, underdeveloped sites in Designated Areas are occupied predominantly by businesses in transportation, wholesale and construction; businesses that are often truck-dependent or reliant on open storage yards. Under the Proposed Action, it is expected that these sites would continue to be occupied by existing or similar businesses. Contrarily, under the No-Action Condition, it is projected that by the Build Year, 20 self-storage facilities would be developed in Designated Areas in M districts. Under the A-text Alternative, it is expected that less than 20 new mixed industrial and self-storage developments would be developed. Based on conclusions of the mixed-use feasibility analysis, the type of industrial tenants most compatible for such space would be smaller scale, less truck-dependent manufacturing uses. Therefore, land use conditions in the future with the A-text Alternative are likely to include more new space for manufacturing uses, but potentially fewer sites available to larger scale construction, wholesale and transportation businesses.

Mixed industrial and self-storage development can be feasible in certain New York City markets depending on the operational, design and financial characteristics of the uses. However, not all permitted industrial uses would be likely to be compatible candidates for these developments. The most likely uses to occupy space in mixed-use buildings are those that have more limited off-street loading needs, such as creative manufacturing, food and beverage manufacturing and advanced manufacturing, as explained above. Therefore, land use conditions in the future with the Mixed Use Alternative are likely to include more new space for manufacturing uses, but potentially fewer sites available to larger scale construction, wholesale and transportation businesses.

It is expected, therefore, that in the Future under the A-text Alternative, many sites would continue to be available for self-storage and could accommodate a similar, albeit somewhat lower, rate of growth than has been experienced in Designated Areas in M districts in the past.

### **23.5.3. Socioeconomic Conditions:**

#### ***23.5.3.1. Adverse Effects On Specific Industries***

The Proposed Action could potentially result in significant adverse impacts on the self-storage industry since the proposed restriction would substantially limit available siting opportunities for a rapidly growing sector. Compared to the Proposed Action, the A-text Alternative provides some additional siting opportunities for self-storage, by proposing an as-of-right framework with specific conditions for the siting of self-storage facilities in Designated Areas in M districts. This as-of-right framework is less restrictive and presents less of a disincentive to the development of self-storage development facilities than a CPC Special Permit (the Proposed Action). Furthermore, the proposed A-text considers several modifications of floor area, off-street parking and off-street loading provisions: these provisions would facilitate the proposed set-aside of ground-floor space for manufacturing, semi-industrial and industrial uses. Accordingly, the A-text Alternative would maintain the possibility of self-storage development on the sites where such a mixed-use building is suitable and feasible. This would enable the industry to meet growing demand for its services to a certain extent, while also maintaining siting opportunities for industrial businesses. Furthermore, by providing more siting opportunities within New York City, the A-text Alternative could reduce the number of self-storage facilities that would locate outside the city in the future, compared to the Proposed Action.

However, the A-Text Alternative is likely to still result in somewhat fewer new self-storage facilities than the No-Action Condition, since the required industrial ground floor space still represents an additional hurdle to development. Additionally, since smaller sites would not be available for self-storage, because they could not accommodate the 20,000 square foot industrial ground floor requirement, some local submarkets for self-storage might not be fully served and some self-storage that would take place in Designated M Areas might occur instead in other C8 and M areas.

Accordingly, it is expected that the A-text would reduce the Proposed Action's potential for a significant adverse environmental impacts on Socioeconomic Conditions related to the self-storage industry.

#### **23.5.4. Historic and cultural Resources**

The Proposed Action has the potential to result in significant adverse impacts to archaeological resources as it may result in deeper in-ground disturbance. While the potential impacts of the provisions are expected to be limited and unlikely, it is not possible to conclude where and to what extent additional in-ground disturbance might occur. As such, the possibility of significant impacts on archaeological resources cannot be eliminated.

Since some additional development may still shift to more optimal development sites outside Designated Areas, the A-text Alternative would not mitigate the potential for significant adverse impacts related to archaeology.

#### **23.5.5. Hazardous Materials**

The Proposed Action itself is not expected to induce development on sites where development would not have otherwise been possible thereby limiting the potential for additional in-ground disturbance. It is also not anticipated to increase building footprints. It could, however, result in deeper excavation compared to the No Action scenario as the building heights under the With Action condition are anticipated to be slightly taller. Given the land uses in the area, and their associated potential for hazardous materials, this would result in the potential for significant adverse hazardous materials impacts. These potential impacts would be unmitigated.

Since some additional development may still shift to more optimal development sites outside Designated Areas, the A-text Alternative would not mitigate the potential for significant adverse impacts related to hazardous materials.

#### **23.5.6. Transportation**

The analyses presented in Chapter 15 of the FEIS, "Transportation," conclude that a "worst-case" +/- 167,000 gross square foot prototype for transportation would generate 40 peak hour vehicle trips which falls below the CEQR Level One Screening threshold of 50 vehicles per hour. The transit and pedestrian trips fall well below the applicable Level One screening thresholds as presented in Table 16-2 of the 2014 CEQR Technical Manual. The analysis presented below reaches the same conclusion for the A-text.

As discussed above in "Description of the Alternative", the A-text would contain floor area for self-storage use and an additional +/- 20,000 gross square feet (gsf) of floor area for manufacturing, semi-industrial and industrial uses in Use Groups 11A, 16A, 16B, 16D, 17 and 18; art studios in Use Group

9A; and photographic or motion picture production studios, radio or television studios in Use Group 10A. As in the air quality analysis for the A-text Alternative, a total gross floor area of 98,000 gsf has been assumed, with +/- 78,000 gsf of self-storage area, and +/- 20,000 gsf of manufacturing, semi-industrial and industrial uses.

A two-step procedure was used to project vehicle trips associated with this Alternative. First, the 40 peak hour vehicle trips identified in the DEIS for the 167,000 gsf self-storage facility were adjusted to represent the trips associated with the “worst case” 78,000 gsf of self-storage contemplated under A-text. Second, vehicle trips were projected for the 20,000 gsf of new manufacturing, semi-industrial and industrial uses. In order to provide a clearly conservative analysis, all trips were projected to be via automobile and as in the DEIS, auto occupancy was taken as 1.2 persons per vehicle. The resulting analysis yields a projection of 39 new peak hour vehicle trips during the busiest hour, which falls below the 50 vehicle trip CEQR Level 1 Screening Threshold. Transit and pedestrian trips would similarly fall below the CEQR Level 1 screening threshold and since a detailed traffic analysis is not needed, as per the guidelines presented in the 2014 CEQR Technical Manual, there can be no significant adverse parking impacts. Consistent with the Proposed Action, the A-text Alternative would not result in any significant adverse transportation impacts.

**23.5.7. Air Quality**

It is projected that the A-text Alternative would result in the same conclusion as the Proposed Action for Mobile Source air quality assessment. However, since the A-text would increase permitted floor area by up to 20,000 sf in certain M1-1 districts, a new detailed analysis is conducted to assess the potential air quality impacts from the HVAC and hot water systems to the surrounding neighborhood. Alternative 1 analyzed is selected as representative for this analysis to study such impacts. The stationary source analysis considers the use of Fuel Oil #2 for HVAC systems. Using the same methodology as the Proposed Action, the pollutants analyzed consist of SO<sub>2</sub> and PM<sub>2.5</sub>. The detailed analysis is performed using the AERMOD model with and without downwash options for the different scenarios.

The background pollutant concentrations and the applicable criteria are listed as follow:

<u>Pollutant</u>	<u>Average Period</u>	<u>Location</u>	<u>Concentration (µg/m<sup>3</sup>)</u>	<u>NAAQS (µg/m<sup>3</sup>)</u>
<u>SO<sub>2</sub></u>	<u>1-hour<sup>1</sup></u>	<u>Botanical Garden, Bronx</u>	<u>28.8</u>	<u>197</u>
	<u>3-hour<sup>2</sup></u>	<u>Botanical Garden, Bronx</u>	<u>162</u>	<u>1,300</u>
<u>PM<sub>2.5</sub></u>	<u>24-hour</u>	<u>Botanical Garden, Bronx</u>	<u>24</u>	<u>35</u>

**Notes:**

(1) The 1-Hour SO<sub>2</sub> background concentration is based on the maximum 99th percentile concentration averaged over three years of data, from 2014–2016.

(2) The 3-hour SO<sub>2</sub> background concentration is based on the 5-year highest second-highest measured value from 2008–2012.

**Source:** New York State Air Quality Report Ambient Air Monitoring System, NYSDEC, 2014-2016.

The Maximum Modeled Concentration ( $\mu\text{g}/\text{m}^3$ ) of the detail analysis is presented in the following table:

<u>Pollutant</u>	<u>SO<sub>2</sub></u>		<u>PM<sub>2.5</sub> (Increment)</u>	
	<u>1-Hour</u>	<u>3-Hour</u>	<u>24-Hour</u>	<u>Annual</u>
<u>Total Modeled Concentration (With Downwash/Without Downwash)</u>	<u>29.4/30.4</u>	<u>163.5/164.5</u>	<u>0.77/4.97</u>	<u>0.04/0.18</u>
<u>Background</u>	<u>28.8</u>	<u>162</u>	<u>24</u>	<u>N/A</u>
<u>NAAQS / De Minimis <sup>1</sup></u>	<u>197</u>	<u>1310</u>	<u>5.5*</u>	<u>0.3*</u>

<sup>(1)</sup>The PM<sub>2.5</sub> *de minimis* criteria is 5.5  $\mu\text{g}/\text{m}^3$  for the 24-Hour period, which is half the difference between the NAAQS of 35  $\mu\text{g}/\text{m}^3$  and the ambient monitored background of 24.0  $\mu\text{g}/\text{m}^3$ , and 0.3  $\mu\text{g}/\text{m}^3$  for the annual period.

The prototypical analysis for the A-text show that there would be no potential significant adverse air quality impacts from fossil fuel-fired heat and hot water systems, as the maximum modeled concentration for the critical pollutants are below that of the NAAQS or CEQR De Minimis thresholds. In conclusion, the A-text Alternative would not result in any significant adverse air quality impacts.

### 23.5.8. Other Analysis Categories

In terms of impacts for other analysis categories, in the Mixed Use Alternative, given that this is a city-wide action, it is difficult to forecast additional possible impacts. However, since neither the Proposed Action nor the No-Action Alternative would be expected to induce new development or significantly alter the amount, density, form, or type of new development expected by the build year, the effects of the A-text Alternative on other technical areas would be expected to be similar to the Proposed Action, and the potential for significant adverse impacts would be unlikely.

## 23.6. MODIFIED A-TEXT ALTERNATIVE

### 23.6.1. Description of Alternative – Modified A-text Alternative

In response to comments received on the DEIS, a Modified A-text Alternative was developed to increase the feasibility of mixed-use self-storage and industrial development, with the objective of addressing public comment and further reducing significant adverse business impacts on the self-storage industry. The Modified A-Text Alternative contains potential modifications under consideration by the City Planning Commission that would affect the amended zoning text application (ULURP application N 170425 (A) ZRY).

Because storage units located on the ground floor offer the highest rents, and modern industrial uses do not in all cases require ground floor space and may benefit from occupying space on other floors that is usually rented at lower rents, the Modified A-text Alternative would allow for some flexibility in the placement of the required industrial space. The Modified A-text Alternative provides that at least half of

the required industrial space should be located on the ground floor, while the other half may be located either directly above or below the ground floor, as long as it benefits from direct access to the industrial space on the ground floor, freight elevators and loading berths.

The Modified A-text Alternative furthermore includes rules that are appropriate to lots of all sizes, opposed to the A-text Alternative with as-of-right considerations that are only practicable for lots that can accommodate 20,000 square feet of industrial space on the ground floor. As explained under the A-text Alternative, since 25,000 square feet represents a lot size for which it is possible to provide both the necessary ground-level facilities for self-storage and an industrial space sized to users' needs, as well as loading and the required mechanical spaces, the Modified A-text Alternative establishes rules that differ for lots smaller than 25,000 square feet and lots equal to or larger than 25,000 square feet.

The Modified A-text Alternative would permit self-storage development as-of-right on large lots, considered as lots larger than or equal to 25,000 SF, provided that an industrial floor space component equivalent to 50 percent of the lot area is provided. On small lots, , considered as lots smaller than 25,000 square feet, floor space equivalent to 50 percent of the lot area may be provided in the form of large self-storage units, defined as units equal to or larger than 100 square feet, because units of these sizes are typically rented by businesses.

The Modified A-text Alternative furthermore changes the conditions of the Special Permit, requiring an analysis of the financial feasibility of constructing and maintaining the required industrial space considers in order to modify, reduce or waive the required industrial space, Accordingly, the Modified A-text Alternative includes a BSA Special Permit to modify, reduce or waive the industrial space requirement, should the requirement create financial hardship, with no reasonable possibility that a self-storage facility including such industrial floor area would bring a reasonable return.

The Modified A-text Alternative furthermore maintains several aspects of the A-text Alternative.

- The required industrial space could be occupied by a list of industrial uses including:

Use Group 9A      only art studios

Use Group 10A    only photographic or motion picture production studios, radio or television studios

Use Group 11A    as specified in Section 32-20;

Use Group 16A    as specified in Section 32-25;

Use Group 16B    as specified in Section 32-25;

Use Group 16D    as specified in Section 32-25, excluding moving or storage offices and warehouses that are self-service storage facilities

Use Group 17      as specified in Section 42-14;

Use Group 18      as specified in Section 42-15;

- In M1-1 districts, up to 20,000 SF of the required industrial floor area may exceed the 1.0 FAR cap in underlying zoning. This will permit a wider range of practical lot sizes for the mixed-use alternative in these low-FAR districts.

- The floor-to-ceiling height of the industrial space shall be at least 15 feet, but the Modified A-text Alternative does not require that one third of the industrial space shall have floor-to-ceiling heights



of at least 23 feet, since according to this Alternative, the industrial space requirement may be fulfilled on different stories, and a 23 foot requirement would not be practicable.

- In M1-1, M1-2, M1-4, M2-1, M2-3, M3-1, M3-2 districts, the number of required off-street loading berths shall instead be those specified for M1-3, M1-5, M1-6, M2-2 and M2-4 districts. This effectively waives the required second loading berth should the industrial space exceed 25,000 sq. ft., and reflects the practical difficulty of providing an adequately sized ground floor industrial space, multiple 50-foot-deep loading bays for the industrial use, and ground floor loading and lobby facilities for a self-storage facility. The loading berth requirements applicable to the ground floor industrial space are thus:

<u>Floor Area (in square feet)</u>	<u>Required Berths</u>
<u>First 15,000</u>	<u>None</u>
<u>Next 25,000</u>	<u>1</u>
<u>Next 40,000</u>	<u>1</u>
<u>Each additional 80,000 or fraction thereof</u>	<u>1</u>

- The parking for the required industrial use shall amount to 1 per 2,000 sq. ft. of floor area or 1 per 3 employees, whichever will require a lesser number of spaces - regardless of the underlying zoning requirements. This is, as a practical matter, the required amount of parking for a warehouse use and other uses in Parking Requirement Category G, as well as for a Use Group 17A contractor's establishment. Manufacturing uses and wholesale establishments, both important potential users of this required industrial space, are subject to higher practical parking requirements (1 space per 1,000 sf and one space per 600 sf, respectively) even though their employment densities are similarly low and auto use by workers is also expected to be low, given typical pay rates for nonsupervisory workers in these industries. As with loading, sizable amounts of required off-street parking cannot as a practical matter be accommodated, given other uses required on the ground floor level.

The proposed Modified A-text Alternative would result in the following changes (see illustration) to the Mixed-Use examples as illustrated for the A-text Alternative:

Alternate Example 1 with **Modification to the A-Text**

Lot Area: 60,000 sf

Zoning: M1-1

FAR: 1.0

Lot: Through

For any required use that occupies the industrial floor space, regardless of the underlying zoning, the parking for the required use shall be at the rate of 1 per 2,000 sf of floor area or 1 per 3 employees, whichever will require a lesser number of spaces.

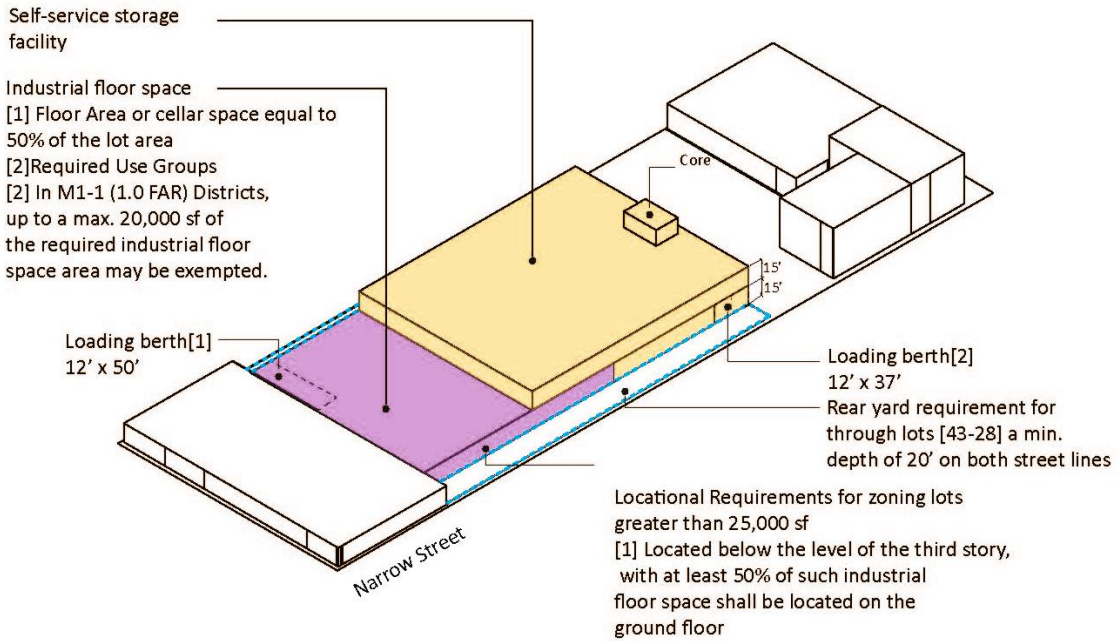


Figure 9: 3D Illustration of potential building typology proposed by the Modified A-text Alternative

**Alternate Example 2 with Modifications to the A-Text**

Lot Area: 60,000 sf

Zoning: M1-5

FAR: 5.0

Lot: Through

For any use that occupies the industrial floor space, regardless of the underlying zoning, the parking for the required use shall be at the rate of 1 per 2,000 sf of floor area or 1 per 3 employees, whichever will require a lesser number of space.

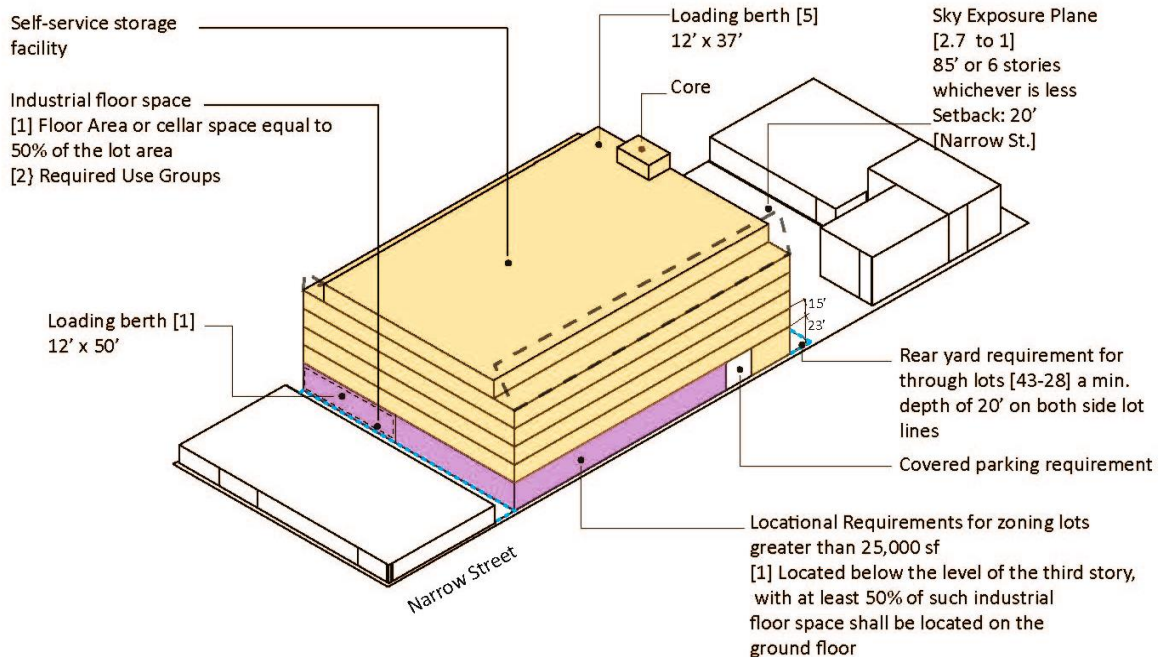


Figure 10: 3D Illustration of potential building typology proposed by the Modified A-text Alternative

Compared to the A-text Alternative, the Modified A-text Alternative does not result in major changes in the illustrations. In both examples, the industrial space increased from 20,000 square feet to 30,000 square feet, because the required industrial space is equal in floor area or cellar space to 50 percent of the lot area, amounting to 60,000 square feet in both examples. The examples do not illustrate the fact that under the modified A-text alternative, the industrial space could also be located on the second story or the cellar.

**23.6.2. Land Use, Zoning and Public Policy**

The Modified A-text Alternative is likely to result in somewhat fewer new self-storage facilities than would be expected in the No-Action Alternative, since the required industrial ground floor space still represents an additional hurdle. However, it provides additional siting opportunities for self-storage

compared to the Proposed Action, by proposing an as-of-right framework with specific conditions for the siting of self-storage facilities in Designated Areas in M districts.

Sites that would be redeveloped with mixed self-storage and industrial developments would be larger sites, with a minimum of 25,000 square feet, since the industrial space requirement would not apply on sites smaller than 25,000 square feet. As described in the, "Land Use, Zoning, and Public Policy" Chapter, the sites which are suitable for mixed-use self-storage development are numerous and widely dispersed throughout the Designated Areas.

The majority of large, underdeveloped sites in Designated Areas are occupied predominantly by businesses in transportation, wholesale and construction; businesses that are often truck-dependent or reliant on open storage yards. Under the Proposed Action, it is expected that these sites would continue to be occupied by existing or similar businesses. Contrarily, under the No-Action Condition, it is projected that by the Build Year, 20 self-storage facilities would be developed in Designated Areas in M districts. Under the Modified A-text Alternative, it is expected that less than 20 new mixed industrial and self-storage developments would be developed. Mixed industrial and self-storage development can be feasible in certain New York City markets depending on the operational, design and financial characteristics of the uses. Based on conclusions of the mixed-use feasibility analysis, the type of industrial tenants most compatible for such space would be smaller scale, less truck-dependent manufacturing uses. However, not all permitted industrial uses would be likely to be compatible candidates for these developments. The most likely uses to occupy space in mixed-use buildings are those that have more limited off-street loading needs, such as creative manufacturing, food and beverage manufacturing and advanced manufacturing, as explained above. Those are permitted uses by zoning and would be compatible both with self-storage and the general character of the Designated Areas in M districts.

### **23.6.3. Socioeconomic Conditions**

#### **23.6.3.1. Adverse Effects on Specific Industries**

The Proposed Action could potentially result in significant adverse impacts on the self-storage industry since the proposed restriction would substantially limit available siting opportunities for a rapidly growing sector. Compared to the Proposed Action, the Modified A-Text Alternative provides some additional siting opportunities for self-storage, by proposing an as-of-right framework with specific conditions for the siting of self-storage facilities in Designated Areas in M districts. This as-of-right framework is less restrictive and presents less of a disincentive to the development of self-storage development facilities than the Proposed Action. It also provides more options for the siting of self-storage facilities compared to the A-text Alternative, because it offers provisions for the siting of self-storage facilities on small sites and includes provisions that make the locational requirements associated with the industrial space more flexible. Furthermore, the Modified A-text Alternative considers the same modifications of floor area, off-street parking and off-street loading provisions as the A-text Alternative, which facilitate the proposed set-aside for manufacturing, semi-industrial and industrial uses. The Modified A-text Alternatives nevertheless largely achieves the purpose and need of the Proposed Action by allowing the low job-generating self-storage use to occur in specified

circumstances only in conjunction with more job-intensive industrial uses. Self-storage development in Designated Areas in M districts would be permitted as-of-right as long as it simultaneously creates industrial space serving more job-intensive industrial businesses.

The Modified A-text Alternative would enable the industry to meet growing demand for its services to a certain extent, while also maintaining siting opportunities for industrial businesses. Furthermore, by providing more siting opportunities within New York City, the Modified A-text Alternative could reduce the number of self-storage facilities that would locate outside the city in the future, compared to the Proposed Action.

However, the A-Text Alternative is likely to still result in somewhat fewer new self-storage facilities than the No-Action Condition, since the required industrial ground floor space still represents an additional hurdle to development. Accordingly, some local markets for self-storage might not be fully served and some self-storage that would take place in Designated M Areas might occur instead in other C8 and M areas. Accordingly, it is expected that the Modified A-Text Alternative would reduce, but not fully mitigate, the Proposed Action's potential for a significant adverse environmental impacts on Socioeconomic Conditions related to the self-storage industry.

#### **23.6.4. Historic and Cultural Resources**

The Proposed Action has the potential to result in significant adverse impacts to archaeological resources as it may result in deeper in-ground disturbance. While the potential impacts of the provisions are expected to be limited and unlikely, it is not possible to conclude where and to what extent additional in-ground disturbance might occur. As such, the possibility of significant impacts on archaeological resources cannot be eliminated.

Since some additional development may still shift to more optimal development sites outside Designated Areas, the Modified A-text Alternative would not mitigate the potential for significant adverse impacts related to archaeology.

#### **23.6.5. Hazardous Materials**

The Proposed Action itself is not expected to induce development on sites where development would not have otherwise been possible thereby limiting the potential for additional in-ground disturbance. It is also not anticipated to increase building footprints. It could, however, result in deeper excavation compared to the No Action scenario as the building heights under the With Action condition are anticipated to be slightly taller. Given the land uses in the area, and their associated potential for hazardous materials, this would result in the potential for significant adverse hazardous materials impacts. These potential impacts would be unmitigated.

Since some additional development may still shift to more optimal development sites outside Designated Areas, the Modified A-text Alternative would not mitigate the potential for significant adverse impacts related to hazardous materials.

### 23.6.6. Transportation

As in the Proposed Action and A-text Alternative, the Modified A-text Alternative would not result in significant adverse transportation impacts. The analyses presented in Chapter 15, "Transportation," conclude that a reasonable worst-case +/- 167,000 gsf self-storage prototype that could locate outside Designated Areas as a result of the Proposed Action would generate 40 peak hour vehicle trips, which falls below the CEQR Level 1 Screening threshold of 50 vehicles per hour. The transit and pedestrian trips fall below the applicable Level 1 screening thresholds as presented in Table 16-2 of the 2014 CEQR Technical Manual. Based on the screening analysis, the FEIS concludes that the Proposed Action would not result in the potential for significant adverse transportation impacts. Under the Modified A-text Alternative, some additional development may shift to more optimal sites in M and C8 districts outside of Designated Areas, but this would be expected to be a very small number of sites. The analysis of the self-storage prototype located outside of Designated Areas provides a conservative analysis for the Modified A-text Alternative.

The analysis presented below considers the Modified A-text that contemplates a reasonable worst-case +/- 88,000 gsf self-storage and industrial use prototype that could locate within Designated Areas. As discussed above in "Description of the Alternative", the reasonable worst case development scenario associated with the Modified A-text Alternative would contain 55,000 gsf of self-storage use and an additional +/- 33,000 gsf of manufacturing, semi-industrial and industrial uses in Use Groups 11A, 16A, 16B, 16D, 17 and 18; art studios in Use Group 9A; and photographic or motion picture production studios, radio or television studios in Use Group 10A.

According to the 2014 CEQR Technical Manual procedures for transportation analysis, a two tiered screening process can be undertaken to determine whether a quantified analysis is necessary. The first step, the Level 1 (Trip Generation) screening, determines whether the volume of peak hour person and vehicle trips generated by the proposed project would remain below the minimum thresholds for further study. These thresholds are:

- 50 peak hour vehicle trip ends;
- 200 peak hour subway/rail or bus transit riders; and
- 200 peak hour pedestrian trips.

If the Action results in increments that would exceed any of these thresholds, a Level 2 (Trip Assignment) screening assessment is generally performed. Under this assessment, project-generated trips that exceed Level 1 thresholds are assigned to and from the site through their respective networks streets, buses, subway lines, sidewalks, etc. This determines the volume of peak hour vehicular traffic that would be added per intersection, the volume of riders that would be added per subway line or bus route, and the walk trips that would be added per individual pedestrian network element (sidewalk, crosswalk, corner reservoir area, etc.). If the Level 2 screening assessment determines that no traffic locations, transit lines/station elements, or pedestrian network elements would experience an increase in trips beyond the above thresholds for any peak hour, then there is generally no potential for significant impacts and no further analysis is typically warranted

A trip generation analysis was performed to project future vehicle, pedestrian, and transit trips associated with the Modified A-text Alternative. Trips associated with the self-storage space were projected using the trip assumptions presented in Chapter 15 of the FEIS, "Transportation." Trips associated with the industrial space were projected using trip rates and modal and temporal distributions that were used in the East Harlem FEIS (CEQR No. 17DCPO48M). The resulting analysis

yields a projection of 19 new peak hour vehicle trips during the busiest hour, which falls below the 50 vehicle trip CEQR Level 1 Screening Threshold. Transit and pedestrian trips would similarly fall below the CEQR Level 1 screening threshold and since a detailed traffic analysis is not needed, as per the guidelines presented in the 2014 CEQR Technical Manual, there can be no significant adverse parking impacts. Consistent with the Proposed Action and A-text Alternative, the Modified A-text Alternative would not result in any significant adverse transportation impacts.

### **23.6.7. Air Quality**

As in the Proposed Action and A-text Alternative, the Modified A-text Alternative would not result in significant adverse air quality impacts. The Modified A-text contemplates two mixed-use self-storage and industrial use prototypes that could locate within Designated Areas, as described above in "Description of the Alternative." Prototype 1 would result in the same floor area increment as the A-text Alternative Prototype 1. The Air Quality analysis for the A-text Alternative concludes that no significant adverse air quality impacts would occur. Prototype 2 would not result in any increase in floor area or change in building height, therefore, no analysis is warranted.

### **23.6.8. Other Analysis Categories**

In terms of impacts for other analysis categories for the Modified A-text Alternative, given that this is a city-wide action, it is difficult to forecast additional possible impacts. However, neither the Proposed Action nor the No-Action Alternative would be expected to induce new development or significantly alter the amount, density, form, or type of new development expected by the build year. The effects of the Modified A-text Alternative on other technical areas would be expected to be similar to the Proposed Action, and the potential for significant adverse impacts would be unlikely.