

ENVIRONMENTAL ASSESSMENT STATEMENT

Self-storage Text Amendment

Lead Agency:

New York City Department of City Planning (DCP)

120 Broadway – 31st Floor
New York, NY 10271

CEQR No. 17DCP119Y

March 1, 2017

Prepared for:

New York City Department of City Planning (DCP)

120 Broadway – 31st Floor
New York, NY 10271

Prepared by:

New York City Department of City Planning (DCP)

120 Broadway – 31st Floor
New York, NY 10271



City Environmental Quality Review

ENVIRONMENTAL ASSESSMENT STATEMENT (EAS) FULL FORM

Please fill out and submit to the appropriate agency (see instructions)

Part I: GENERAL INFORMATION

PROJECT NAME Self-storage Text Amendment

1. Reference Numbers

CEQR REFERENCE NUMBER (to be assigned by lead agency)
17DCP119Y

BSA REFERENCE NUMBER (if applicable)

ULURP REFERENCE NUMBER (if applicable)
Pending

OTHER REFERENCE NUMBER(S) (if applicable)
(e.g., legislative intro, CAPA)

2a. Lead Agency Information

NAME OF LEAD AGENCY
NYC Department of City Planning

2b. Applicant Information

NAME OF APPLICANT
Eric Kober

NAME OF LEAD AGENCY CONTACT PERSON
Robert Dobruskin

NAME OF APPLICANT'S REPRESENTATIVE OR CONTACT PERSON

ADDRESS 120 Broadway, 31st floor

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CITY New York STATE NY ZIP 10271

CITY New York STATE NY ZIP 10271

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3. Action Classification and Type

SEQRA Classification

☐ UNLISTED ☒ TYPE I: Specify Category (see 6 NYCRR 617.4 and NYC Executive Order 91 of 1977, as amended):

Action Type (refer to [Chapter 2](#), "Establishing the Analysis Framework" for guidance)

☐ LOCALIZED ACTION, SITE SPECIFIC ☐ LOCALIZED ACTION, SMALL AREA ☒ GENERIC ACTION

4. Project Description

DCP proposes a citywide zoning text amendment to establish a Special Permit under the jurisdiction of the City Planning Commission (CPC) for all new self-storage development in proposed "Designated Areas" in M Districts.

Project Location Citywide, please see Attachment A of EAS

BOROUGH BX, BK, QN, SI COMMUNITY DISTRICT(S) STREET ADDRESS

TAX BLOCK(S) AND LOT(S) ZIP CODE

DESCRIPTION OF PROPERTY BY BOUNDING OR CROSS STREETS

EXISTING ZONING DISTRICT, INCLUDING SPECIAL ZONING DISTRICT DESIGNATION, IF ANY M1, M2, M3 ZONING SECTIONAL MAP NUMBER

5. Required Actions or Approvals (check all that apply)

City Planning Commission: ☒ YES ☐ NO ☐ UNIFORM LAND USE REVIEW PROCEDURE (ULURP)

☐ CITY MAP AMENDMENT

☐ ZONING CERTIFICATION

☐ CONCESSION

☐ ZONING MAP AMENDMENT

☐ ZONING AUTHORIZATION

☐ UDAAP

☒ ZONING TEXT AMENDMENT

☐ ACQUISITION—REAL PROPERTY

☐ REVOCABLE CONSENT

☐ SITE SELECTION—PUBLIC FACILITY

☐ DISPOSITION—REAL PROPERTY

☐ FRANCHISE

☐ HOUSING PLAN & PROJECT

☐ OTHER, explain:

☐ SPECIAL PERMIT (if appropriate, specify type: ☐ modification; ☐ renewal; ☐ other); EXPIRATION DATE:

SPECIFY AFFECTED SECTIONS OF THE ZONING RESOLUTION : several. Amongst others: 12-10; 41-11; 42-12; 62-80; 74

Board of Standards and Appeals: ☐ YES ☐ NO

☐ VARIANCE (use)

☐ VARIANCE (bulk)

☐ SPECIAL PERMIT (if appropriate, specify type: ☐ modification; ☐ renewal; ☐ other); EXPIRATION DATE:

SPECIFY AFFECTED SECTIONS OF THE ZONING RESOLUTION

Department of Environmental Protection: ☐ YES ☐ NO If "yes," specify:

Other City Approvals Subject to CEQR (check all that apply)

☐ LEGISLATION

☐ FUNDING OF CONSTRUCTION, specify:

☐ RULEMAKING

☐ POLICY OR PLAN, specify:

☐ CONSTRUCTION OF PUBLIC FACILITIES

☐ FUNDING OF PROGRAMS, specify:

<input type="checkbox"/> 384(b)(4) APPROVAL <input type="checkbox"/> OTHER, explain:	<input type="checkbox"/> PERMITS, specify:
Other City Approvals Not Subject to CEQR (check all that apply) N/A <input type="checkbox"/> PERMITS FROM DOT'S OFFICE OF CONSTRUCTION MITIGATION AND COORDINATION (OCMC) <input type="checkbox"/> LANDMARKS PRESERVATION COMMISSION APPROVAL <input type="checkbox"/> OTHER, explain:	
State or Federal Actions/Approvals/Funding: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO If "yes," specify:	
6. Site Description: The directly affected area consists of the project site and the area subject to any change in regulatory controls. Except where otherwise indicated, provide the following information with regard to the directly affected area. Graphics: The following graphics must be attached and each box must be checked off before the EAS is complete. Each map must clearly depict the boundaries of the directly affected area or areas and indicate a 400-foot radius drawn from the outer boundaries of the project site. Maps may not exceed 11 x 17 inches in size and, for paper filings, must be folded to 8.5 x 11 inches.	
<input type="checkbox"/> SITE LOCATION MAP <input type="checkbox"/> ZONING MAP <input type="checkbox"/> SANBORN OR OTHER LAND USE MAP <input type="checkbox"/> TAX MAP <input type="checkbox"/> FOR LARGE AREAS OR MULTIPLE SITES, A GIS SHAPE FILE THAT DEFINES THE PROJECT SITE(S) <input type="checkbox"/> PHOTOGRAPHS OF THE PROJECT SITE TAKEN WITHIN 6 MONTHS OF EAS SUBMISSION AND KEYED TO THE SITE LOCATION MAP	
Physical Setting (both developed and undeveloped areas) Total directly affected area (sq. ft.): 10,254 acres Waterbody area (sq. ft.) and type: Roads, buildings, and other paved surfaces (sq. ft.): Other, describe (sq. ft.):	
7. Physical Dimensions and Scale of Project (if the project affects multiple sites, provide the total development facilitated by the action) SIZE OF PROJECT TO BE DEVELOPED (gross square feet): N/A NUMBER OF BUILDING N/A GROSS FLOOR AREA OF EACH BUILDING (sq. ft.): N/A HEIGHT OF EACH BUILDING (ft.): N/A NUMBER OF STORIES OF EACH BUILDING: N/A	
Does the proposed project involve changes in zoning on one or more sites? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If "yes," specify: The total square feet owned or controlled by the applicant: see EAS The total square feet not owned or controlled by the applicant: see EAS	
Does the proposed project involve in-ground excavation or subsurface disturbance, including, but not limited to foundation work, pilings, utility lines, or grading? <input type="checkbox"/> YES <input type="checkbox"/> NO N/A see EAS If "yes," indicate the estimated area and volume dimensions of subsurface disturbance (if known): AREA OF TEMPORARY DISTURBANCE: sq. ft. (width x length) VOLUME OF DISTURBANCE: cubic ft. (width x length x depth) AREA OF PERMANENT DISTURBANCE: sq. ft. (width x length)	
8. Analysis Year CEQR Technical Manual Chapter 2	
ANTICIPATED BUILD YEAR (date the project would be completed and operational): 2027	
ANTICIPATED PERIOD OF CONSTRUCTION IN MONTHS: N/A	
WOULD THE PROJECT BE IMPLEMENTED IN A SINGLE PHASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF MULTIPLE PHASES, HOW MANY?	
BRIEFLY DESCRIBE PHASES AND CONSTRUCTION SCHEDULE:	
9. Predominant Land Use in the Vicinity of the Project (check all that apply) <input type="checkbox"/> RESIDENTIAL <input checked="" type="checkbox"/> MANUFACTURING <input checked="" type="checkbox"/> COMMERCIAL <input type="checkbox"/> PARK/FOREST/OPEN SPACE <input type="checkbox"/> OTHER, specify:	

DESCRIPTION OF EXISTING AND PROPOSED CONDITIONS N/A please see Attachment A of EAS

The information requested in this table applies to the directly affected area. The directly affected area consists of the project site and the area subject to any change in regulatory control. The increment is the difference between the No-Action and the With-Action conditions.

	EXISTING CONDITION	NO-ACTION CONDITION	WITH-ACTION CONDITION	INCREMENT
LAND USE				
Residential	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	N/A , see EAS
If "yes," specify the following:				
Describe type of residential structures				
No. of dwelling units				
No. of low- to moderate-income units				
Gross floor area (sq. ft.)				
Commercial	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	N/A , see EAS
If "yes," specify the following:				
Describe type (retail, office, other)				
Gross floor area (sq. ft.)				
Manufacturing/Industrial	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	N/A , see EAS
If "yes," specify the following:				
Type of use				
Gross floor area (sq. ft.)				
Open storage area (sq. ft.)				
If any unenclosed activities, specify:				
Community Facility	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	N/A , see EAS
If "yes," specify the following:				
Type				
Gross floor area (sq. ft.)				
Vacant Land	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	N/A , see EAS
If "yes," describe:				
Publicly Accessible Open Space	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	N/A , see EAS
If "yes," specify type (mapped City, State, or Federal parkland, wetland—mapped or otherwise known, other):				
Other Land Uses	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	N/A , see EAS
If "yes," describe:				
PARKING N/A , see EAS				
Garages	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	
If "yes," specify the following:				
No. of public spaces				
No. of accessory spaces				
Operating hours				
Attended or non-attended				
Lots	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	
If "yes," specify the following:				
No. of public spaces				
No. of accessory spaces				
Operating hours				
Other (includes street parking)	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	
If "yes," describe:				
POPULATION N/A , see EAS				
Residents	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	
If "yes," specify number:				
Briefly explain how the number of residents was calculated:				

	EXISTING CONDITION	NO-ACTION CONDITION	WITH-ACTION CONDITION	INCREMENT
Businesses	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	N/A see EAS
If "yes," specify the following:				
No. and type				
No. and type of workers by business				
No. and type of non-residents who are not workers				
Briefly explain how the number of businesses was calculated:				
Other (students, visitors, concert-goers, etc.)	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	N/A see EAS
If any, specify type and number:				
Briefly explain how the number was calculated:				
ZONING				
Zoning classification	see EAS			
Maximum amount of floor area that can be developed	see EAS			
Predominant land use and zoning classifications within land use study area(s) or a 400 ft. radius of proposed project	see EAS			
Attach any additional information that may be needed to describe the project.				
If your project involves changes that affect one or more sites not associated with a specific development, it is generally appropriate to include total development projections in the above table and attach separate tables outlining the reasonable development scenarios for each site.				

Part II: TECHNICAL ANALYSIS

INSTRUCTIONS: For each of the analysis categories listed in this section, assess the proposed project's impacts based on the thresholds and criteria presented in the CEQR Technical Manual. Check each box that applies.

- If the proposed project can be demonstrated not to meet or exceed the threshold, check the "no" box.
- If the proposed project will meet or exceed the threshold, or if this cannot be determined, check the "yes" box.
- For each "yes" response, provide additional analyses (and, if needed, attach supporting information) based on guidance in the CEQR Technical Manual to determine whether the potential for significant impacts exists. Please note that a "yes" answer does not mean that an EIS must be prepared—it means that more information may be required for the lead agency to make a determination of significance.
- The lead agency, upon reviewing Part II, may require an applicant to provide additional information to support the Full EAS Form. For example, if a question is answered "no," an agency may request a short explanation for this response.

	YES	NO
1. LAND USE, ZONING, AND PUBLIC POLICY: CEQR Technical Manual Chapter 4 Will be analyzed in the DEIS		
(a) Would the proposed project result in a change in land use different from surrounding land uses?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Would the proposed project result in a change in zoning different from surrounding zoning?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) Is there the potential to affect an applicable public policy?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d) If "yes," to (a), (b), and/or (c), complete a preliminary assessment and attach.		
(e) Is the project a large, publicly sponsored project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
o If "yes," complete a PlaNYC assessment and attach. to be completed in DEIS		
(f) Is any part of the directly affected area within the City's Waterfront Revitalization Program boundaries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
o If "yes," complete the Consistency Assessment Form . to be completed in DEIS		
2. SOCIOECONOMIC CONDITIONS: CEQR Technical Manual Chapter 5 Will be analyzed in DEIS		
(a) Would the proposed project:		
o Generate a net increase of more than 200 residential units or 200,000 square feet of commercial space?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
▪ If "yes," answer both questions 2(b)(ii) and 2(b)(iv) below.		
o Directly displace 500 or more residents?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
▪ If "yes," answer questions 2(b)(i), 2(b)(ii), and 2(b)(iv) below.		
o Directly displace more than 100 employees?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
▪ If "yes," answer questions under 2(b)(iii) and 2(b)(iv) below.		
o Affect conditions in a specific industry?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
▪ If "yes," answer question 2(b)(v) below.		
(b) If "yes" to any of the above, attach supporting information to answer the relevant questions below. If "no" was checked for each category above, the remaining questions in this technical area do not need to be answered.		
i. Direct Residential Displacement		
o If more than 500 residents would be displaced, would these residents represent more than 5% of the primary study area population?	<input type="checkbox"/>	<input type="checkbox"/>
o If "yes," is the average income of the directly displaced population markedly lower than the average income of the rest of the study area population?	<input type="checkbox"/>	<input type="checkbox"/>
ii. Indirect Residential Displacement		
o Would expected average incomes of the new population exceed the average incomes of study area populations?	<input type="checkbox"/>	<input type="checkbox"/>
o If "yes:"		
▪ Would the population of the primary study area increase by more than 10 percent?	<input type="checkbox"/>	<input type="checkbox"/>
▪ Would the population of the primary study area increase by more than 5 percent in an area where there is the potential to accelerate trends toward increasing rents?	<input type="checkbox"/>	<input type="checkbox"/>
o If "yes" to either of the preceding questions, would more than 5 percent of all housing units be renter-occupied and unprotected?	<input type="checkbox"/>	<input type="checkbox"/>
iii. Direct Business Displacement		
o Do any of the displaced businesses provide goods or services that otherwise would not be found within the trade area, either under existing conditions or in the future with the proposed project?	<input type="checkbox"/>	<input type="checkbox"/>
o Is any category of business to be displaced the subject of other regulations or publicly adopted plans to preserve,	<input type="checkbox"/>	<input type="checkbox"/>

	YES	NO
enhance, or otherwise protect it?		
iv. Indirect Business Displacement		
o Would the project potentially introduce trends that make it difficult for businesses to remain in the area?	<input type="checkbox"/>	<input type="checkbox"/>
o Would the project capture retail sales in a particular category of goods to the extent that the market for such goods would become saturated, potentially resulting in vacancies and disinvestment on neighborhood commercial streets?	<input type="checkbox"/>	<input type="checkbox"/>
v. Effects on Industry		
o Would the project significantly affect business conditions in any industry or any category of businesses within or outside the study area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
o Would the project indirectly substantially reduce employment or impair the economic viability in the industry or category of businesses?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. COMMUNITY FACILITIES: CEQR Technical Manual Chapter 6 Will be analyzed in the DEIS		
(a) Direct Effects		
o Would the project directly eliminate, displace, or alter public or publicly funded community facilities such as educational facilities, libraries, health care facilities, day care centers, police stations, or fire stations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Indirect Effects		
i. Child Care Centers		
o Would the project result in 20 or more eligible children under age 6, based on the number of low or low/moderate income residential units? (See Table 6-1 in Chapter 6)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
o If "yes," would the project result in a collective utilization rate of the group child care/Head Start centers in the study area that is greater than 100 percent?	<input type="checkbox"/>	<input type="checkbox"/>
o If "yes," would the project increase the collective utilization rate by 5 percent or more from the No-Action scenario?	<input type="checkbox"/>	<input type="checkbox"/>
ii. Libraries		
o Would the project result in a 5 percent or more increase in the ratio of residential units to library branches? (See Table 6-1 in Chapter 6)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
o If "yes," would the project increase the study area population by 5 percent or more from the No-Action levels?	<input type="checkbox"/>	<input type="checkbox"/>
o If "yes," would the additional population impair the delivery of library services in the study area?	<input type="checkbox"/>	<input type="checkbox"/>
iii. Public Schools		
o Would the project result in 50 or more elementary or middle school students, or 150 or more high school students based on number of residential units? (See Table 6-1 in Chapter 6)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
o If "yes," would the project result in a collective utilization rate of the elementary and/or intermediate schools in the study area that is equal to or greater than 100 percent?	<input type="checkbox"/>	<input type="checkbox"/>
o If "yes," would the project increase this collective utilization rate by 5 percent or more from the No-Action scenario?	<input type="checkbox"/>	<input type="checkbox"/>
iv. Health Care Facilities		
o Would the project result in the introduction of a sizeable new neighborhood?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
o If "yes," would the project affect the operation of health care facilities in the area?	<input type="checkbox"/>	<input type="checkbox"/>
v. Fire and Police Protection		
o Would the project result in the introduction of a sizeable new neighborhood?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
o If "yes," would the project affect the operation of fire or police protection in the area?	<input type="checkbox"/>	<input type="checkbox"/>
4. OPEN SPACE: CEQR Technical Manual Chapter 7 Will be analyzed in DEIS		
(a) Would the project change or eliminate existing open space?	<input type="checkbox"/>	<input type="checkbox"/>
(b) Is the project located within an under-served area in the <u>Bronx, Brooklyn, Manhattan, Queens, or Staten Island</u> ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) If "yes," would the project generate more than 50 additional residents or 125 additional employees?	<input type="checkbox"/>	<input type="checkbox"/>
(d) Is the project located within a well-served area in the <u>Bronx, Brooklyn, Manhattan, Queens, or Staten Island</u> ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e) If "yes," would the project generate more than 350 additional residents or 750 additional employees?	<input type="checkbox"/>	<input type="checkbox"/>
(f) If the project is located in an area that is neither under-served nor well-served, would it generate more than 200 additional residents or 500 additional employees?	<input type="checkbox"/>	<input type="checkbox"/>
(g) If "yes" to questions (c), (e), or (f) above, attach supporting information to answer the following:		
o If in an under-served area, would the project result in a decrease in the open space ratio by more than 1 percent?	<input type="checkbox"/>	<input type="checkbox"/>
o If in an area that is not under-served, would the project result in a decrease in the open space ratio by more than 5	<input type="checkbox"/>	<input type="checkbox"/>

	YES	NO
percent?		
<input type="radio"/> If "yes," are there qualitative considerations, such as the quality of open space, that need to be considered? Please specify:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. SHADOWS: CEQR Technical Manual Chapter 8		
(a) Would the proposed project result in a net height increase of any structure of 50 feet or more?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Would the proposed project result in any increase in structure height and be located adjacent to or across the street from a sunlight-sensitive resource?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) If "yes" to either of the above questions, attach supporting information explaining whether the project's shadow would reach any sunlight-sensitive resource at any time of the year.		
6. HISTORIC AND CULTURAL RESOURCES: CEQR Technical Manual Chapter 9 Will be analyzed in the DEIS		
(a) Does the proposed project site or an adjacent site contain any architectural and/or archaeological resource that is eligible for or has been designated (or is calendared for consideration) as a New York City Landmark, Interior Landmark or Scenic Landmark; that is listed or eligible for listing on the New York State or National Register of Historic Places; or that is within a designated or eligible New York City, New York State or National Register Historic District? (See the GIS System for Archaeology and National Register to confirm)	<input type="checkbox"/>	<input type="checkbox"/>
(b) Would the proposed project involve construction resulting in in-ground disturbance to an area not previously excavated?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) If "yes" to either of the above, list any identified architectural and/or archaeological resources and attach supporting information on whether the proposed project would potentially affect any architectural or archeological resources.		
7. URBAN DESIGN AND VISUAL RESOURCES: CEQR Technical Manual Chapter 10 Will be analyzed in the DEIS		
(a) Would the proposed project introduce a new building, a new building height, or result in any substantial physical alteration to the streetscape or public space in the vicinity of the proposed project that is not currently allowed by existing zoning?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Would the proposed project result in obstruction of publicly accessible views to visual resources not currently allowed by existing zoning?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) If "yes" to either of the above, please provide the information requested in Chapter 10 .		
8. NATURAL RESOURCES: CEQR Technical Manual Chapter 11 Will be analyzed in the DEIS		
(a) Does the proposed project site or a site adjacent to the project contain natural resources as defined in Section 100 of Chapter 11 ?	<input type="checkbox"/>	<input type="checkbox"/>
<input type="radio"/> If "yes," list the resources and attach supporting information on whether the project would affect any of these resources.		
(b) Is any part of the directly affected area within the Jamaica Bay Watershed ?	<input type="checkbox"/>	<input type="checkbox"/>
<input type="radio"/> If "yes," complete the Jamaica Bay Watershed Form and submit according to its instructions .		
9. HAZARDOUS MATERIALS: CEQR Technical Manual Chapter 12 Will be analyzed in the DEIS		
(a) Would the proposed project allow commercial or residential uses in an area that is currently, or was historically, a manufacturing area that involved hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Does the proposed project site have existing institutional controls (e.g., (E) designation or Restrictive Declaration) relating to hazardous materials that preclude the potential for significant adverse impacts?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) Would the project require soil disturbance in a manufacturing area or any development on or near a manufacturing area or existing/historic facilities listed in Appendix 1 (including nonconforming uses)? N/A	<input type="checkbox"/>	<input type="checkbox"/>
(d) Would the project result in the development of a site where there is reason to suspect the presence of hazardous materials, contamination, illegal dumping or fill, or fill material of unknown origin? N/A	<input type="checkbox"/>	<input type="checkbox"/>
(e) Would the project result in development on or near a site that has or had underground and/or aboveground storage tanks (e.g., gas stations, oil storage facilities, heating oil storage)? N/A	<input type="checkbox"/>	<input type="checkbox"/>
(f) Would the project result in renovation of interior existing space on a site with the potential for compromised air quality; vapor intrusion from either on-site or off-site sources; or the presence of asbestos, PCBs, mercury or lead-based paint? N/A	<input type="checkbox"/>	<input type="checkbox"/>
(g) Would the project result in development on or near a site with potential hazardous materials issues such as government-listed voluntary cleanup/brownfield site, current or former power generation/transmission facilities, coal gasification or gas storage sites, railroad tracks or rights-of-way, or municipal incinerators? N/A	<input type="checkbox"/>	<input type="checkbox"/>
(h) Has a Phase I Environmental Site Assessment been performed for the site?	<input type="checkbox"/>	<input type="checkbox"/>
<input type="radio"/> If "yes," were Recognized Environmental Conditions (RECs) identified? Briefly identify:		
(i) Based on the Phase I Assessment, is a Phase II Investigation needed?	<input type="checkbox"/>	<input type="checkbox"/>
10. WATER AND SEWER INFRASTRUCTURE: CEQR Technical Manual Chapter 13 Will be analyzed in the DEIS		
(a) Would the project result in water demand of more than one million gallons per day?	<input type="checkbox"/>	<input type="checkbox"/>
(b) If the proposed project located in a combined sewer area, would it result in at least 1,000 residential units or 250,000 square feet or more of commercial space in Manhattan, or at least 400 residential units or 150,000 square feet or more of commercial space in the Bronx, Brooklyn, Staten Island, or Queens?	<input type="checkbox"/>	<input checked="" type="checkbox"/>


	YES	NO
(c) If the proposed project located in a <u>separately sewer</u> ed area, would it result in the same or greater development than that listed in Table 13-1 in Chapter 13 ?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d) Would the project involve development on a site that is 5 acres or larger where the amount of impervious surface would increase?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e) If the project is located within the <u>Jamaica Bay Watershed</u> or in certain <u>specific drainage areas</u> , including Bronx River, Coney Island Creek, Flushing Bay and Creek, Gowanus Canal, Hutchinson River, Newtown Creek, or Westchester Creek, would it involve development on a site that is 1 acre or larger where the amount of impervious surface would increase?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f) Would the proposed project be located in an area that is partially sewered or currently unsewered?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(g) Is the project proposing an industrial facility or activity that would contribute industrial discharges to a Wastewater Treatment Plant and/or contribute contaminated stormwater to a separate storm sewer system?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(h) Would the project involve construction of a new stormwater outfall that requires federal and/or state permits?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(i) If "yes" to any of the above, conduct the appropriate preliminary analyses and attach supporting documentation.		
11. SOLID WASTE AND SANITATION SERVICES: CEQR Technical Manual Chapter 14 Will be analyzed in the DEIS		
(a) Using Table 14-1 in Chapter 14 , the project's projected operational solid waste generation is estimated to be (pounds per week):		
o Would the proposed project have the potential to generate 100,000 pounds (50 tons) or more of solid waste per week?	<input type="checkbox"/>	<input type="checkbox"/>
(b) Would the proposed project involve a reduction in capacity at a solid waste management facility used for refuse or recyclables generated within the City?	<input type="checkbox"/>	<input type="checkbox"/>
o If "yes," would the proposed project comply with the City's Solid Waste Management Plan?	<input type="checkbox"/>	<input type="checkbox"/>
12. ENERGY: CEQR Technical Manual Chapter 15 Will be analyzed in the DEIS		
(a) Using energy modeling or Table 15-1 in Chapter 15 , the project's projected energy use is estimated to be (annual BTUs):		
(b) Would the proposed project affect the transmission or generation of energy?	<input type="checkbox"/>	<input type="checkbox"/>
13. TRANSPORTATION: CEQR Technical Manual Chapter 16 Will be analyzed in the DEIS		
(a) Would the proposed project exceed any threshold identified in Table 16-1 in Chapter 16 ?	<input type="checkbox"/>	<input type="checkbox"/>
(b) If "yes," conduct the appropriate screening analyses, attach back up data as needed for each stage, and answer the following questions:		
o Would the proposed project result in 50 or more Passenger Car Equivalents (PCEs) per project peak hour?	<input type="checkbox"/>	<input type="checkbox"/>
If "yes," would the proposed project result in 50 or more vehicle trips per project peak hour at any given intersection? **It should be noted that the lead agency may require further analysis of intersections of concern even when a project generates fewer than 50 vehicles in the peak hour. See Subsection 313 of Chapter 16 for more information.	<input type="checkbox"/>	<input type="checkbox"/>
o Would the proposed project result in more than 200 subway/rail or bus trips per project peak hour?	<input type="checkbox"/>	<input type="checkbox"/>
If "yes," would the proposed project result, per project peak hour, in 50 or more bus trips on a single line (in one direction) or 200 subway/rail trips per station or line?	<input type="checkbox"/>	<input type="checkbox"/>
o Would the proposed project result in more than 200 pedestrian trips per project peak hour?	<input type="checkbox"/>	<input type="checkbox"/>
If "yes," would the proposed project result in more than 200 pedestrian trips per project peak hour to any given pedestrian or transit element, crosswalk, subway stair, or bus stop?	<input type="checkbox"/>	<input type="checkbox"/>
14. AIR QUALITY: CEQR Technical Manual Chapter 17 Will be analyzed in the DEIS		
(a) <i>Mobile Sources:</i> Would the proposed project result in the conditions outlined in Section 210 in Chapter 17 ?	<input type="checkbox"/>	<input type="checkbox"/>
(b) <i>Stationary Sources:</i> Would the proposed project result in the conditions outlined in Section 220 in Chapter 17 ?	<input type="checkbox"/>	<input type="checkbox"/>
o If "yes," would the proposed project exceed the thresholds in Figure 17-3, Stationary Source Screen Graph in Chapter 17 ? (Attach graph as needed)	<input type="checkbox"/>	<input type="checkbox"/>
(c) Does the proposed project involve multiple buildings on the project site?	N/A	<input type="checkbox"/>
(d) Does the proposed project require federal approvals, support, licensing, or permits subject to conformity requirements?	<input type="checkbox"/>	<input type="checkbox"/>
(e) Does the proposed project site have existing institutional controls (e.g., (E) designation or Restrictive Declaration) relating to air quality that preclude the potential for significant adverse impacts?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(f) If "yes" to any of the above, conduct the appropriate analyses and attach any supporting documentation.		
15. GREENHOUSE GAS EMISSIONS: CEQR Technical Manual Chapter 18 Will be analyzed in the DEIS		
(a) Is the proposed project a city capital project or a power generation plant?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Would the proposed project fundamentally change the City's solid waste management system?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) Would the proposed project result in the development of 350,000 square feet or more?	<input type="checkbox"/>	<input type="checkbox"/>
(d) If "yes" to any of the above, would the project require a GHG emissions assessment based on guidance in Chapter 18 ?	<input type="checkbox"/>	<input type="checkbox"/>
o If "yes," would the project result in inconsistencies with the City's GHG reduction goal? (See Local Law 22 of 2008 ; § 24-	<input type="checkbox"/>	<input type="checkbox"/>

	YES	NO
803 of the Administrative Code of the City of New York). Please attach supporting documentation.		
16. NOISE: CEQR Technical Manual Chapter 19 Will be analyzed in the DEIS		
(a) Would the proposed project generate or reroute vehicular traffic?	<input type="checkbox"/>	<input type="checkbox"/>
(b) Would the proposed project introduce new or additional receptors (see Section 124 in Chapter 19) near heavily trafficked roadways, within one horizontal mile of an existing or proposed flight path, or within 1,500 feet of an existing or proposed rail line with a direct line of site to that rail line?	<input type="checkbox"/>	<input type="checkbox"/>
(c) Would the proposed project cause a stationary noise source to operate within 1,500 feet of a receptor with a direct line of sight to that receptor or introduce receptors into an area with high ambient stationary noise?	<input type="checkbox"/>	<input type="checkbox"/>
(d) Does the proposed project site have existing institutional controls (e.g., (E) designation or Restrictive Declaration) relating to noise that preclude the potential for significant adverse impacts?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e) If "yes" to any of the above, conduct the appropriate analyses and attach any supporting documentation.		
17. PUBLIC HEALTH: CEQR Technical Manual Chapter 20 Will be analyzed in the DEIS		
(a) Based upon the analyses conducted, do any of the following technical areas require a detailed analysis: Air Quality; Hazardous Materials; Noise?	<input type="checkbox"/>	<input type="checkbox"/>
(b) If "yes," explain why an assessment of public health is or is not warranted based on the guidance in Chapter 20 , "Public Health." Attach a preliminary analysis, if necessary.		
18. NEIGHBORHOOD CHARACTER: CEQR Technical Manual Chapter 21 Will be analyzed in the DEIS		
(a) Based upon the analyses conducted, do any of the following technical areas require a detailed analysis: Land Use, Zoning, and Public Policy; Socioeconomic Conditions; Open Space; Historic and Cultural Resources; Urban Design and Visual Resources; Shadows; Transportation; Noise?	<input type="checkbox"/>	<input type="checkbox"/>
(b) If "yes," explain why an assessment of neighborhood character is or is not warranted based on the guidance in Chapter 21 , "Neighborhood Character." Attach a preliminary analysis, if necessary.		
19. CONSTRUCTION: CEQR Technical Manual Chapter 22 Will be analyzed in the DEIS		
(a) Would the project's construction activities involve:		
o Construction activities lasting longer than two years?	<input type="checkbox"/>	<input type="checkbox"/>
o Construction activities within a Central Business District or along an arterial highway or major thoroughfare?	<input type="checkbox"/>	<input type="checkbox"/>
o Closing, narrowing, or otherwise impeding traffic, transit, or pedestrian elements (roadways, parking spaces, bicycle routes, sidewalks, crosswalks, corners, etc.)?	<input type="checkbox"/>	<input type="checkbox"/>
o Construction of multiple buildings where there is a potential for on-site receptors on buildings completed before the final build-out?	<input type="checkbox"/>	<input type="checkbox"/>
o The operation of several pieces of diesel equipment in a single location at peak construction?	<input type="checkbox"/>	<input type="checkbox"/>
o Closure of a community facility or disruption in its services?	<input type="checkbox"/>	<input type="checkbox"/>
o Activities within 400 feet of a historic or cultural resource?	<input type="checkbox"/>	<input type="checkbox"/>
o Disturbance of a site containing or adjacent to a site containing natural resources?	<input type="checkbox"/>	<input type="checkbox"/>
o Construction on multiple development sites in the same geographic area, such that there is the potential for several construction timelines to overlap or last for more than two years overall?	<input type="checkbox"/>	<input type="checkbox"/>
(b) If any boxes are checked "yes," explain why a preliminary construction assessment is or is not warranted based on the guidance in Chapter 22 , "Construction." It should be noted that the nature and extent of any commitment to use the Best Available Technology for construction equipment or Best Management Practices for construction activities should be considered when making this determination.		

20. APPLICANT'S CERTIFICATION

I swear or affirm under oath and subject to the penalties for perjury that the information provided in this Environmental Assessment Statement (EAS) is true and accurate to the best of my knowledge and belief, based upon my personal knowledge and familiarity with the information described herein and after examination of the pertinent books and records and/or after inquiry of persons who have personal knowledge of such information or who have examined pertinent books and records.

Still under oath, I further swear or affirm that I make this statement in my capacity as the applicant or representative of the entity that seeks the permits, approvals, funding, or other governmental action(s) described in this EAS.

APPLICANT/REPRESENTATIVE NAME NYC Department of City Planning	SIGNATURE 	DATE
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PLEASE NOTE THAT APPLICANTS MAY BE REQUIRED TO SUBSTANTIATE RESPONSES IN THIS FORM AT THE DISCRETION OF THE LEAD AGENCY SO THAT IT MAY SUPPORT ITS DETERMINATION OF SIGNIFICANCE.

Part III: DETERMINATION OF SIGNIFICANCE (To Be Completed by Lead Agency)		
INSTRUCTIONS: In completing Part III, the lead agency should consult 6 NYCRR 617.7 and 43 RCNY § 6-06 (Executive Order 91 or 1977, as amended), which contain the State and City criteria for determining significance.		
1. For each of the impact categories listed below, consider whether the project may have a significant adverse effect on the environment, taking into account its (a) location; (b) probability of occurring; (c) duration; (d) irreversibility; (e) geographic scope; and (f) magnitude.	Potentially Significant Adverse Impact	
IMPACT CATEGORY	YES	NO
Land Use, Zoning, and Public Policy	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Socioeconomic Conditions	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Community Facilities and Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Open Space	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Shadows	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Historic and Cultural Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Urban Design/Visual Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Natural Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Hazardous Materials	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Water and Sewer Infrastructure	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Solid Waste and Sanitation Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Energy	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Transportation	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Air Quality	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Greenhouse Gas Emissions	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Noise	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Public Health	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Neighborhood Character	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Construction	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Are there any aspects of the project relevant to the determination of whether the project may have a significant impact on the environment, such as combined or cumulative impacts, that were not fully covered by other responses and supporting materials? If there are such impacts, attach an explanation stating whether, as a result of them, the project may have a significant impact on the environment.	<input type="checkbox"/>	<input type="checkbox"/>
3. Check determination to be issued by the lead agency:		
<input checked="" type="checkbox"/> Positive Declaration: If the lead agency has determined that the project may have a significant impact on the environment, and if a Conditional Negative Declaration is not appropriate, then the lead agency issues a <i>Positive Declaration</i> and prepares a draft Scope of Work for the Environmental Impact Statement (EIS).		
<input type="checkbox"/> Conditional Negative Declaration: A <i>Conditional Negative Declaration</i> (CND) may be appropriate if there is a private applicant for an Unlisted action AND when conditions imposed by the lead agency will modify the proposed project so that no significant adverse environmental impacts would result. The CND is prepared as a separate document and is subject to the requirements of 6 NYCRR Part 617.		
<input type="checkbox"/> Negative Declaration: If the lead agency has determined that the project would not result in potentially significant adverse environmental impacts, then the lead agency issues a <i>Negative Declaration</i> . The <i>Negative Declaration</i> may be prepared as a separate document (see template) or using the embedded Negative Declaration on the next page.		
4. LEAD AGENCY'S CERTIFICATION		
TITLE Director, EARD	LEAD AGENCY NYC Department of City Planning	
NAME Robert Dobruskin	DATE March 1, 2017	
SIGNATURE <i>Robert Dobruskin</i>		

CONTENTS

Contents	11
Table of Figures.....	13
Attachment A: Project Description.....	14
Executive Summary	14
I. Introduction	15
II. Background	15
A. Background: Industrial Business Zones	15
B. Background: Recent Trends.....	19
C. Background: Self-storage	19
III. Purpose and Need	21
IV. Description of the Proposed Action	24
A. Proposed regulatory mechanism	24
B. Designated Areas in M districts	25
C. Intended Effects of the Action.....	25
Attachment B: Analytic Framework.....	28
I. Analysis Framework.....	28
II. Areas Affected by the Proposed Action.....	29
III. Build Year	35
IV. Existing Conditions	36
A. Self-storage	36
V. Future No-Action Condition	39
A. Self-storage Citywide.....	39
B. Geographic distribution of self-storage facilities in NYC in No-Action Condition	40
C. Projections.....	42
VI. Future With-Action Condition	43
A. Self-storage Citywide.....	43
B. Geographic distribution of self-storage facilities in NYC in With-Action Condition	45
C. Projections.....	48
VII. No-Action and With-Action Condition Compared	49
Attachment C: Preliminary Screening Analyses	51
I. Land use, zoning, and public policy	51
II. Socioeconomic conditions.....	51

A.	Direct and indirect residential displacement.....	52
B.	Direct and indirect business and institutional displacement.....	52
C.	Adverse effects on specific industries	52
III.	Community facilities and services	53
IV.	Open space.....	53
V.	Shadows	54
VI.	Historic and cultural resources.....	54
VII.	Urban design and visual resources.....	55
VIII.	Natural resources	55
IX.	Hazardous materials.....	55
X.	Water and sewer infrastructure	56
XI.	Solid waste and sanitation services	56
XII.	Energy	56
XIII.	Transportation.....	57
A.	Traffic and parking.....	57
B.	Transit and Pedestrians	57
XIV.	Air quality	57
XV.	Greenhouse gas emissions and climate change	58
XVI.	Noise	58
XVII.	Public health.....	58
XVIII.	Neighborhood character	59
XIX.	Construction.....	59
	Appendix A - References	60
	Appendix B – Designated Areas in M District Maps	62

TABLE OF FIGURES

Figure 1: M and C8 Zoning Districts.....	16
Figure 2: Industrial Employment Trends in M districts outside Manhattan	17
Figure 3: Examples of recent new investments in industrial businesses	21
Figure 4: Locations of self-storage facilities and truck routes	23
Figure 5: Zoning Framework With And Without The Action	26
Figure 6: Example A.....	26
Figure 7: Example B.....	27
Figure 8: Zoning framework - Future with and without the Action	29
Figure 9: Directly Affected Areas	30
Figure 10: Proposed Designated Areas in M Districts.....	31
Figure 11: M And C8 districts outside of Designated Areas.....	33
Figure 12: M and C8 districts outside of Designated Areas	34
Figure 13: Self-storage facilities by borough and zoning.....	36
Figure 14: Estimated new self-storage facilities per year, by location	37
Figure 15: Pre-construction self-storage	38
Figure 16: Citywide, self-storage No-Action	39
Figure 17: Detailed, self-storage No-Action	42
Figure 18: Citywide, self-storage With-Action	44
Figure 19: Detailed, self-storage With-Action	47
Figure 20: Comparison of No-Action and With-Action Condition.....	50

ATTACHMENT A: PROJECT DESCRIPTION

Executive Summary

In November 2015, Mayor de Blasio announced a 10-point Industrial Action Plan, 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 Plan targets Industrial Business Zones (IBZs) and builds on existing economic development policies for IBZs, which include Industrial Service Provider contracts, tax incentives and the pledge not to rezone IBZs for residential use.

In this context, self-storage facilities are considered a low job-generating use that primarily serves household rather than business needs. They are typically developed on large sites near Designated Truck Routes – sites, which are in limited supply and could potentially provide future siting opportunities for industrial, more job-intensive businesses. Given the City's numerous measures to support industrial businesses in IBZs and the fact that industrial employment has been growing in IBZs since 2010, the use of such sites for self-storage detracts from the City's economic development objectives in IBZs. Accordingly, the New York City Department of City Planning (DCP) proposes a zoning text amendment to require a CPC Special Permit for new self-storage facilities within newly established "Designated Areas" in Manufacturing districts, which largely coincide with IBZs, to ensure that their development does not unduly limit future siting opportunities for industrial, more job-intensive uses.

I. Introduction

In November 2015, Mayor de Blasio announced a 10-point Industrial Action Plan (NYC Office of the Mayor, 2015), 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 Plan's proposals include zoning changes, infrastructure investments and loans and grants for mission-driven developers. The Industrial Action Plan specifically mentions Industrial Business Zones (IBZs), which are subsets of the City's manufacturing zones. These IBZs aim to support employment growth, industrial innovation, and the provision of industrial services, which allow New York City to function and prosper.

The New York City Department of City Planning proposes a zoning text amendment 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. The proposed restrictions would apply within newly established "Designated Areas" in Manufacturing districts, which largely coincide with Industrial Business Zones, and are established as text maps, as shown in Appendix B (Appendix A includes references).

Self-storage facilities are low job-generating uses that primarily serve household needs, rather than business needs. They typically occupy large sites near Designated Truck Routes, which may be utilized by more job-intensive types of industrial activity in New York City's most active industrial areas. Given the City's numerous measures to support industrial businesses in IBZs, and the fact that industrial employment has been growing in IBZs since 2010, the use of such sites for self-storage conflicts with the City's economic development objectives. The proposed text amendments will address these concerns by requiring a City Planning Commission (CPC) Special Permit for any new self-storage development within these Designated Areas. 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 *NYC Zoning Resolution* are met.

The proposed Special Permit will ensure that self-storage development does not utilize locations that may otherwise be used by an 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.

II. Background

A. Background: Industrial Business Zones

The present City administration has recognized the importance of the industrial sector for New York City, which employs 524,000 people (NYSDOL QCEW 2016(P)). Industrial businesses provide essential services such as building construction and maintenance; food and beverage distribution; bus, taxi and air transportation; freight management; waste disposal; and recycling services. These industrial businesses typically generate truck traffic, noise, odors, emissions, require relatively large sites and may be incompatible with residential and high density commercial or community facility development. For these

reasons, such businesses and uses are typically only permitted in Manufacturing districts and C8 districts, most of which do not permit new residences.

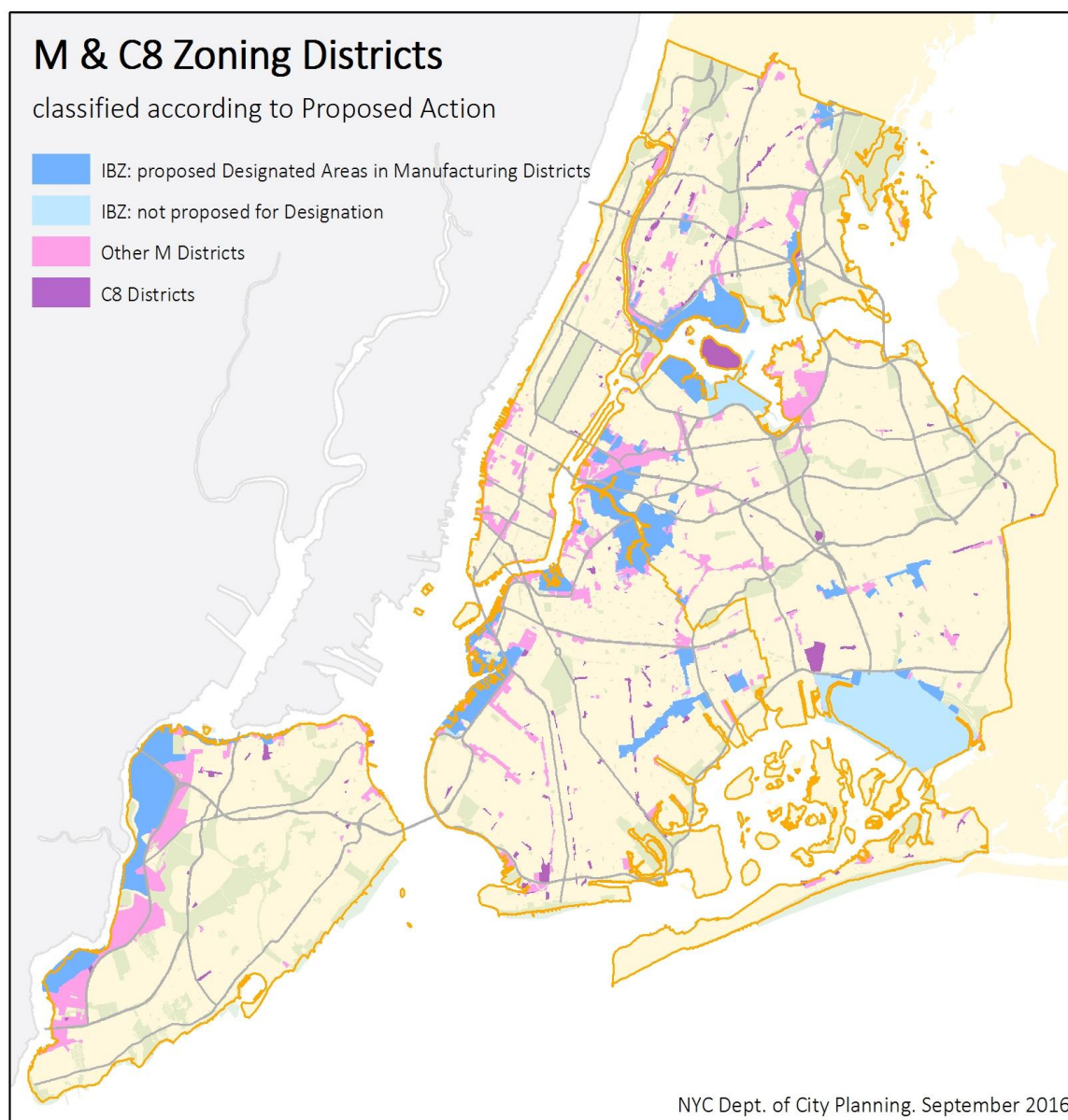


Figure 1: M and C8 Zoning Districts

A manufacturing district, designated by the letter M (M1-1, M2-2, for example), is a zoning district in which industrial and manufacturing uses, most commercial uses and some community facility uses are permitted. Industrial uses are subject to a range of performance standards. Performance standards are minimum requirements or maximum allowable limits on noise, vibration, smoke, odor and other effects of industrial uses listed in Use Groups 17 and 18 in the *NYC Zoning Resolution*. New residential development is typically not allowed, except in some districts with special designations.

A C8 district is a type of commercial zone that does not allow residential uses and is often mapped along automotive corridors. Similar to M1 districts, C8 districts allow industrial and manufacturing uses, most commercial uses and some community facility uses.

However, not all M or C8 districts are characterized by the same amount or type of industrial and business activity. The previous administration under Mayor Bloomberg identified certain M districts as the most active industrial areas, designating those as Industrial Business Zones, while rezoning others to allow for some residential development. Established in 2006, Industrial Business Zones (IBZs) function as key industrial areas that accommodate and encourage a range of industrial jobs and activities (NYC Office of

Industrial Employment Trends in M districts outside Manhattan



Figure 2: Industrial Employment Trends in M districts outside Manhattan

Source: NYSDOL QCEW 2000, 2010 & 2014 3rd quarter. Analysis excludes M districts in Manhattan, paired M/R districts and airport properties.

the Mayor, 2005). IBZs contain only M districts, but do not comprise all of NYC's M districts (see Figure 1: M and C8 Zoning Districts). Industrial and manufacturing businesses in IBZs are served by City-selected nonprofit organizations and may be eligible for tax incentives, financing tools and workforce development programs. While, up to this point, no specific land use regulations have been tied to IBZs, the Bloomberg administration committed not to rezone these areas to permit residential use; this commitment was reaffirmed within Mayor de Blasio's 10-Point Industrial Action Plan.

An analysis recently completed by the New York City Department of City Planning's Housing, Economic and Infrastructure Planning (HEIP) division (DCP, 2016), showed significant employment growth in Manufacturing (M) districts outside Manhattan, in both industrial and non-industrial sectors between 2010 and 2014. Although non-industrial-sector employment experienced a higher net job growth between 2000 and 2014, M districts remain predominantly industrial, with Industrial Business Zones representing the largest concentrations and gains of industrial employment (see Figure 2).

Mayor de Blasio's announcement of a 10-point Industrial Action Plan in November 2015 (NYC Office of the Mayor, 2015) specifically targeted IBZs, since these are areas especially well-suited to industrial activity and growth. IBZs are now, but have also historically been, New York City's most active industrial areas. IBZs typically offer the large sites industrial businesses require, access to truck routes and highways, and sufficient separation from incompatible uses such as residencies. As such, the economic development goals expressed for this area relate to the ability of industrial and manufacturing businesses to operate and find sites in IBZs, all while providing more job opportunities for New Yorkers.

For the purpose of the Proposed Action and in order to implement the goals expressed by the 10-point Action Plan within a zoning context, the IBZ boundaries needed to be translated into zoning boundaries. This is because IBZ boundaries were related to a tax program and do not exist in the *NYC Zoning Resolution*. See Appendix B for the proposed boundaries, which will be incorporated into the *New York City Zoning Resolution* as text maps.

Overview of Nomenclatures

IBZs or Industrial Business Zones:

Manufacturing-zoned areas in NYC, which were designated under the Bloomberg Administration. The boundaries define eligibility for tax incentives and do not exist in the *NYC Zoning Resolution*. IBZ boundaries are based on tax lots and do not follow the mapping conventions of the *Zoning Resolution*. Not all M districts are IBZs.

Designated Area in Manufacturing districts:

Manufacturing-zoned areas, where the application of a CPC Special Permit for self-storage is proposed. These areas largely mirror current IBZ boundaries, but adhere to the mapping conventions of the *Zoning Resolution*, and will be incorporated into the *Zoning Resolution* as text maps.

B. Background: Recent Trends

Recent DCP research, which will be discussed in further detail in the DEIS, indicates several trends in industrial areas. For example, in New York City – a dense, transit-oriented City with a narrow, historic transportation grid – the number of areas appropriate for industrial businesses that are truck-intensive and require a lot of land is limited. Businesses have difficulty finding the types of spaces they need to operate because of limited supply and high demand. Additionally, increases in land prices for large, industrial lots in M districts have been high, which the Department of City Planning sees as an expression of scarcity: Only an increased demand for such lots in M districts could result in such significant price increases over a short time period. The increased number of transactions and volume of land that has changed hands furthermore points to a growth of real estate interest and market activity in large industrial properties in M districts.

C. Background: Self-storage

Self-storage, also known as mini-storage, is a business model in which space, often within a warehouse, is rented to individuals under a lease or rental agreement, usually on a month-to-month basis, specifically for the purpose of storing personal property. In no case may a self-storage unit be used for residential purposes. The tenant, a household or a business, has sole access to the storage unit, which could be a room, a container or a locker.

Since New York City is large and very densely populated, New York City has been described as ‘the best storage market in the world’ (Morris, 2016). The successful self-storage market in NYC is also reflected in the numbers: according to REIS, a commercial real estate data analytics firm, for the second quarter of 2015, the average asking rent was an annual \$36 per square foot for a climate controlled 10x10 foot unit in New York City, as compared to a national average of \$19 per square foot. Both nationally and in New York City, the asking rent per square foot is projected to increase steadily over the next five years, although asking rent growth rates are expected to decelerate (REIS, 2015).

Since the self-storage industry is a relatively young industry, *New York City’s Zoning Resolution*, dating from 1961, does not consider self-storage as a specific use but regards it more generally as a warehouse or a moving and storage office (Use Group 16D). While Use Group 16 is typically an industrial use, self-storage is better understood as a commercial use: The North American Industry Classification System, which is regularly updated, places self-storage within the *Real Estate and Rental and Leasing* industry sector. This is mostly because over the last decade, due to the large and growing demand for storage and the relative ease of developing self-storage facilities, commercial real estate investors have recognized the potential of self-storage as a valuable property type. Self-storage has even stood out as one of the best-performing commercial real estate asset classes (Carr, 2016; Morris, 2016). In that sense, self-storage resembles a real estate investment business more than a moving or warehousing company, and national, publicly-traded self-storage Real Estate Investment Trusts have come into existence.

Self-storage customers are mainly households, who typically rent self-storage units as a cause of a major life event, such as a move, a house renovation, a death or a divorce. The temporary storage of belongings in a self-storage unit can make such transitions easier. However, DCP has been told by industry

representatives that depending on the location and level of accessibility of a self-storage facility, movers represent a smaller share of customers, and most units are typically rented on a long-term basis. Often, households rent a self-storage unit as an off-site storage room; a result of New York City apartments being small, expensive and often lacking in storage space.

Besides households, between 20 and 30 percent of units nationwide are estimated to be leased by small businesses, such as food truck operators, pharmaceutical reps, contractors for construction, and building maintenance jobs or artists. Small businesses, independent contractors and the self-employed often do not require or cannot afford leasing larger spaces, and self-storage can fulfill their limited storage needs. This topic will be discussed in further detail in the DEIS.

Regarding the number of jobs generated by self-storage, the national Self-storage Association states that an average of 3.5 employees work at each facility (SSA, 2015b). According to recent New York City employment data (NYSDOL Quarterly Census of Wages and Employment, 3rd quarter of 2015), 1,130 employees worked in the self-storage industry, classified as *Lessors of Miniwarehouses and Self-Storage Units* by the North American Industry Classification System. Industry sources have told the Department of City Planning that their employees tend to work at multiple facilities. Accordingly, if 1,130 employees worked at the approximately 226 facilities that existed in the 3rd quarter of 2015 (see Figure 14: Estimated new self-storage facilities per year, by location)¹, each facility would have an average of 5 employees. In that sense, NYC self-storage facilities hire a greater number of employees, on average, than nation-wide, but are nevertheless low job-generators, considering the facilities' large sizes and the fact that the storage space offered benefits primarily households. Additionally, self-storage is increasingly incorporating automated technology, which would further reduce its already low need for personnel. Fully-automated facilities have seen success in some areas; these are unmanned facilities, which combine various technologies including access control, automated kiosks and electronic locks (ISS, 2016). To DCP's knowledge, such fully-automated facilities have not yet become a business model in NYC.

¹ This is an estimate based on available information. There were approximately 239 self-storage facilities in January 2017, 13 of which were permitted in 2016 and 2017.

III. Purpose and Need

The present City administration has recognized the importance of the industrial sector for New York City – a sector, which employs 524,000 people (NYSDOL QCEW 2016(P)). Industrial businesses provide essential services such as building construction and maintenance; food and beverage distribution; bus, taxi and air transportation; freight management; and waste disposal and recycling services. Industrial Business Zones (IBZ) represent the most active industrial areas in New York City, which recent data shows have gained industrial employment since 2010.

Industrial businesses often need specialized space, geographically separated from potentially conflicting uses. In general, these businesses may generate truck traffic, noise, odors or emissions, and consequentially, prefer to locate away from residential, commercial, or community facility developments. These businesses also require relatively large sites and prefer to occupy ground floor space, for loading/unloading and the operation of heavy machinery. Since New York City is dense, and contains a narrow, historic transportation grid, the number of lots that are large and appropriate for truck-intensive uses are limited. Compounding this scarcity is that these lots are in limited supply and high demand.

For the above reasons, Industrial Business Zones have been the objective of several economic development policies and are the City's target areas for the realization of economic development goals supporting a range of industrial and other employment-generating business activities and industrial innovation. The

Construction Business, Maspeth IBZ



Food Manufacturing, Bathgate IBZ



Food distribution, North Brooklyn IBZ



Motion Picture, North Brooklyn IBZ



Figure 3: Examples of recent new investments in industrial businesses
Source: Google Earth and Google Streetview, 2016. Accessed December 20th 2016

announced 10-point Industrial Action Plan (NYC Office of the Mayor, 2015) builds on existing economic development policies for IBZs, which include Industrial Service Provider contracts, tax incentives and the pledge not to rezone IBZs for residential uses. The developments in Figure 3 are examples of recent industrial investments that the City is trying to support.

Self-storage development detracts from the City's economic development objectives for IBZs, since it is a low job-generating use that primarily serves household rather than business needs (SSA, 2015a, p.12). Self-storage facilities typically only store goods, without handling or taking custody for such goods, and even a very large facility may employ only a handful of workers. In NYC, self-storage facilities employ an average of five workers (see previous chapter). Other types of warehouses, commercial storage spaces and moving companies provide not only storage but other essential services, such as moving, distribution, logistics and/or supply chain management services. Since these other warehouses generally offer other services, they also tend to hire a greater number of employees. Employment data from the Quarterly Census of Employment and Wages, collected by the New York State Department of Labor, supports this. According to 2015 3rd quarter QCEW data, there were 386 *Warehousing and Storage* (NAICS code: 4931) and *Used Household and Office Goods Moving* (NAICS code: 48421) firms in New York City. On average, each firm employed 17.8 workers, more than 3.5 times the amount of self-storage.

Self-storage also utilizes land that may be utilized by industrial uses. Recent new construction of self-storage facilities in M districts (30 facilities) were built on lots with an average size of 49,500 square feet; and conversions in M districts (42 facilities) present an average built area of 111,000 square feet. Lots and buildings of such sizes provide important siting opportunities for many industrial businesses, which tend to require sites large enough to accommodate horizontal operations, off-street loading and vehicle fleet parking. Moreover, they are in limited supply in New York City: in a recent study of the North Brooklyn industrial area, interviewed industrial businesses explained that they were finding it difficult to maintain operations in North Brooklyn and New York City in general, among other reasons due to the challenge of expansion and finding appropriate sites, in a context of low industrial vacancy.

Additionally, self-storage facilities typically site along arterial highways and designated truck routes, as shown by the map below (see Figure 4). Sixty-five self-storage facilities have been developed in proposed Designated Areas in M districts: all sixty-five are within a half-mile of a Designated Truck Route, and over 75 percent are within 500 feet of a Designated Truck Route. These are crucial locations for truck-dependent businesses in the wholesale, freight and logistics, construction and other industries. Self-storage facilities have also been developed on sites near transit, which could be ideal for businesses with more employees, who depend on reliable public transportation options to access their work site.

Considering all of the above, self-storage stands out as a low-density employment use when compared to other storage and warehousing businesses, which furthermore tends to occupy large sites along designated truck routes, in a context where such large sites are becoming increasingly scarce. Given the City's numerous measures to support industrial businesses in IBZs and the fact that industrial employment has been growing in IBZs since 2010, the use of such sites for self-storage detracts from the City's economic development objectives.

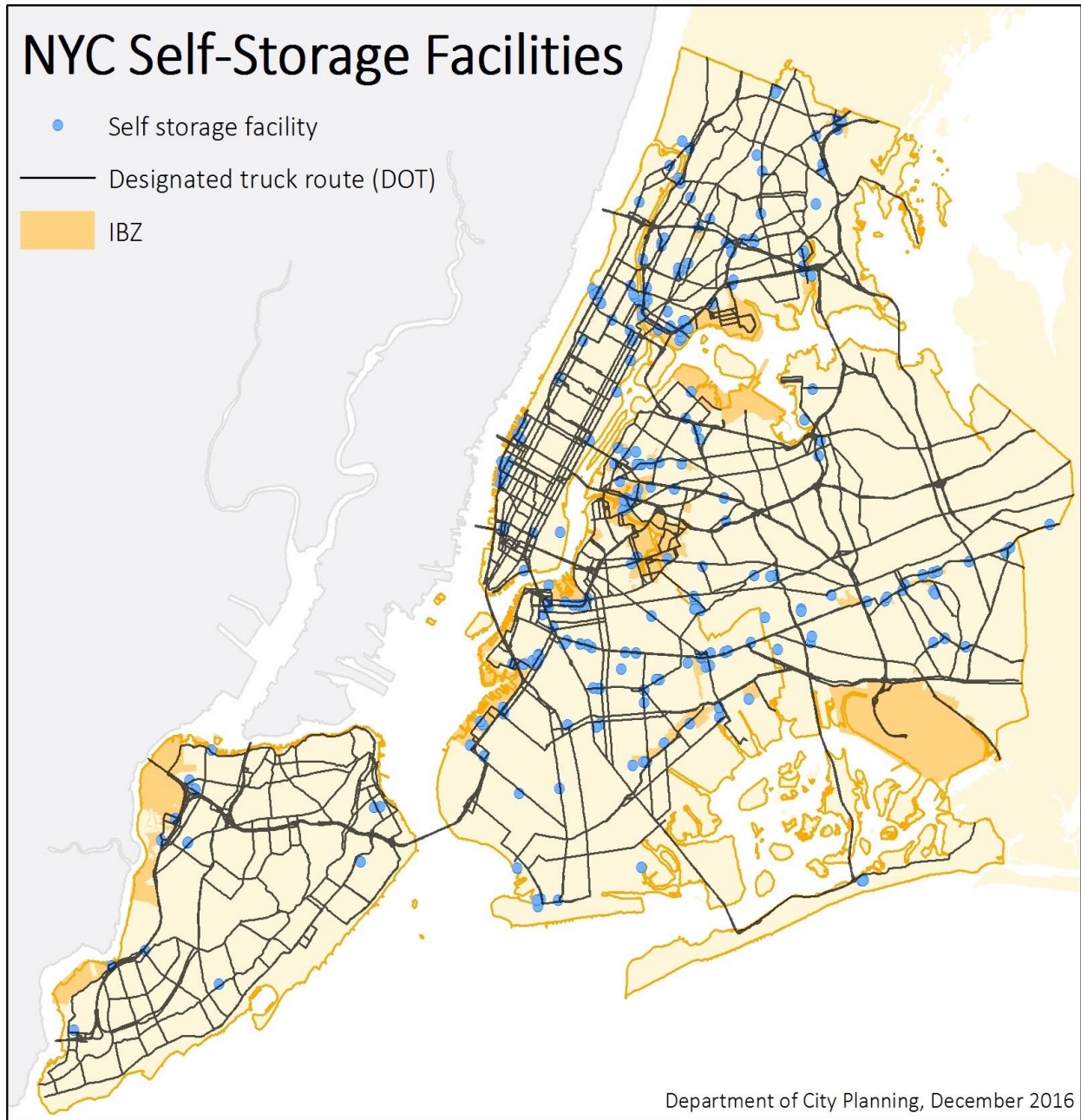


Figure 4: Locations of self-storage facilities and truck routes

IV. Description of the Proposed Action

A. Proposed regulatory mechanism

The Department of City Planning proposes a citywide zoning text amendment to introduce a Special Permit under the jurisdiction of the City Planning Commission for all new self-storage development in proposed 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 elect to review a Special Permit application and Mayoral review is also optional.

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.

Currently, 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 proposed Designated Areas in M districts, which cover a portion of M districts and represent the City's target areas for the realization of economic development objectives.

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. In making its determination, the Commission considers such factors as:

- a) The size of the zoning lot of a proposed development, and whether it could optimally accommodate a new building for industrial use;
- b) The design and arrangement of an existing building proposed for conversion to self-storage and the extent to which it lends itself to industrial uses;
- c) Proximity of a proposed development or conversion to arterial highways and designated truck routes, and the capacity and configuration for truck movement serving industrial uses of local streets providing immediate access to the zoning lot of the proposed development or conversion;
- d) Accessibility of the proposed location to rail and bus transit serving employees of an industrial use;
- e) Potential for conflicts of future industrial uses with existing uses in the surrounding areas, including conforming or nonconforming residences, schools, other community facilities and public open space.
- f) The level of investment or visible signs of disinvestment in industrial uses occurring within the contiguous Designated Area in M district within the last five years.

Existing self-storage facilities could continue to operate as legal non-conforming uses. Extensions and enlargements of such grandfathered self-storage facilities would be permitted within the original zoning lot and the reconstruction of a grandfathered self-storage facility to the previously existing FAR, should it be damaged or destroyed, would be permitted.

B. Designated Areas in M districts

Since IBZ boundaries were created for a tax program, and do not exist in the *NYC Zoning Resolution*, zoning maps needed to be created for the Proposed Action. Accordingly, the Department of City Planning analyzed the existing IBZ boundaries on a case-by-case basis, and in limited cases, rationalized them to ensure that the proposed boundaries would be consistent with zoning practices. The resulting rationalized boundaries are referred to as Designated Areas in Manufacturing districts.

Furthermore, other than the few above-explained individual tax lots or blocks, the John F. Kennedy and La Guardia airport areas have been excluded from the proposed Designated Areas in M districts. These airport areas are not subject to the City's *Zoning Resolution* and play a unique economic role in New York City, providing essential airport services.

See Appendix B for the proposed boundaries, which will be incorporated into the *New York City Zoning Resolution* as text maps.

Overview of Nomenclatures

<i>IBZs or Industrial Business Zones:</i>	Manufacturing-zoned areas in NYC, which were designated under the Bloomberg Administration. The boundaries define eligibility for tax incentives and do not exist in the <i>NYC Zoning Resolution</i> . IBZ boundaries are based on tax lots and do not follow the mapping conventions of the <i>Zoning Resolution</i> . Not all M districts are IBZs.
<i>Designated Area in Manufacturing districts:</i>	Manufacturing-zoned areas, where the application of a CPC Special Permit for self-storage is proposed. These areas largely mirror current IBZ boundaries, but adhere to the mapping conventions of the <i>Zoning Resolution</i> , and will be incorporated into the <i>Zoning Resolution</i> as text maps.

C. Intended Effects of the Action

By introducing a Special Permit for the development of self-storage in proposed Designated Areas in M districts, 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 more job-intensive industrial 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.

The availability of future siting opportunities for industrial businesses in IBZs is a key component of the City's Industrial Action Plan. In order to advance the City's economic development objectives for Industrial Business Zones, the City aims to ensure that the kind of sites that have in the past often been occupied by self-storage facilities, which are typically large, adjacent to a Designated Truck Route and are in limited supply in NYC, remain available to industrial businesses.

Zoning framework: Future with and without the Action

	As-of-right	by Special Permit:
Future no-action	C8 and M districts	-
Future with-action	C8 districts and M districts that are not Designated Areas	Designated Areas in M districts

Figure 5: Zoning Framework With And Without The Action

The examples below are illustrations of existing self-storage sites within Designated Areas in M Districts, where the Department of City Planning believes the self-storage use to be appropriate and not present a lost opportunity for potential future industrial, more job-intensive development.

Example A

Example A (see Figure 6) is a conversion of a post-1961 two-story warehouse at the edge of the Designated Area. The building's indoor loading area fits only small trucks. Access to the major highway occurs via a narrow, one-lane service road, which significantly complicates potential truck entry and exit. DCP expects that a job-intensive industrial business would experience major operational difficulties at this location.



Figure 6: Example A
Source: Google Earth, 2017. Accessed January 18th 2017

Example B

Example B is a new construction and is located next to elevated rail tracks, at the edge of the Designated Area, on a 10,000 square foot lot (see Figure 7). Entrance and egress to the facility are oriented toward a narrow, two-way dead-end road, which has only one travel lane. Any potential truck traffic would be required to first navigate the dead-end, pass the elevated rail tracks, and then cross an entirely residential block, on a road with only one travel lane. On the whole, the site would be very small for an industrial business and would provide deficient truck access.



Figure 7: Example B
Source: Google Earth, 2017. Accessed January 18th 2017

ATTACHMENT B: ANALYTIC FRAMEWORK

I. Analysis Framework

A Reasonable Worst Case Development Scenario (RWCDS) is broadly defined as the potential development under both the future No-Action and With-Action Conditions that is used to determine the change in permitted development created by a discretionary action. The RWCDS analysis takes the existing condition and adds to it known or expected changes in order to arrive at a reasonable estimate of future conditions. The first step in constructing the RWCDS for this project was to estimate the projected development sites in the future without the proposed text amendment for both the directly affected areas and indirectly affected areas. For this proposal, the directly affected areas are the proposed Designated Areas in M districts. The indirectly affected areas are all M and C8 districts, which are not within the proposed Designated Areas in M districts and would not be subject to the Proposed Action. For the purpose of this analytic framework, these areas will be referred to as M and C8 districts outside of Designated Areas.

When considering future development sites, non-conforming uses as defined by the *NYC Zoning Resolution* were excluded. The NYC Zoning Resolution states that under certain circumstances, a non-conforming use may be changed to another non-conforming use. Non-conforming uses are typically not analyzed in analytic frameworks: it is usually assumed that when an area is rezoned, the new zoning district in place will define the type of development that will occur in the future. Accordingly, this development scenario did not consider the possibility of self-storage development in Residential (R) or Commercial (C) districts (except C8): R and C districts allow a wide array of uses, and in the last five years, only one out of thirty-four new self-storage facilities have been developed in these areas. Over the last decade, the ratio is somewhat higher, but still low: nine out of seventy-seven new self-storage facilities were built in R and C districts, outside of M and C8 districts. The probability of a new legal, non-conforming self-storage facility being developed in areas, where residential development is permitted, is further reduced when one considers New York City's lasting housing shortage (NYC Office of the Mayor, 2014).

After the future without the text amendment, the future conditions with the proposed text amendment are estimated. The RWCDS then compares the No-Action Condition to the With-Action Condition; the increment between the two provides the basis of the environmental assessment. The presented framework is intended for analytical purposes, and cannot capture the character or totality of future self-storage development, which is to a large extent unknown.

The Proposed Action establishes a new CPC Special Permit for self-storage development which would be applied city-wide 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 EAS 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.

The Department of City Planning cannot predict with certainty where self-storage facilities will locate in the future. Self-storage facilities and the zoning districts that permit them are relatively dispersed within New York City, and the siting of self-storage facilities is demand-driven, which may furthermore disperse them in the city. As such, this is a generic, city-wide action and the potential impacts of self-storage development

in the future No-Action and Future With-Action Condition will be analyzed by means of a conceptual/prototypical analysis, which will be based on existing trends and reasonable projections for the future.

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. The Proposed Action solely aims to improve future siting opportunities for industrial businesses in NYC, in a context where industrial facilities are already permitted as-of-right in M districts.

Although the Proposed Action itself would not induce development, the occurrence of industrial development is plausible, due to the existence of a variety of economic development policies in place in IBZs, including the 10-Point Industrial Action Plan. The Department of City Planning cannot predict with certainty the kinds of businesses that may occupy a given site. The DEIS will analyze the type and location of industrial development and the potential environmental effects of the placement of such an industrial use. This will be assessed by means of a conceptual/prototypical analysis following CEQR guidelines. As discussed in the Draft Scope of Work, the EIS will also utilize representative examples of industrial development that may occupy the sites in the With Action should self-storage development not occur.

II. Areas Affected by the Proposed Action

A zoning text amendment is proposed, which would require a CPC Special Permit for new self-storage facilities within Designated Areas in Manufacturing districts. The Proposed Action would not apply to C8 and M districts that are not proposed as Designated Areas (see Figure 8). Currently, more than 24,000 acres in NYC are zoned as either M or C8 districts. The Proposed Action would apply to 10,254 acres, which correspond to the Designated Areas in Manufacturing districts, and represent 42 percent of the area where self-storage may currently site as-of-right.

Zoning framework and land area: Future with and without the Action²

	As-of-right	by Special Permit:
Future no-action	C8 and M districts = 24,328 acres	
Future with-action	C8 districts and M districts that are not Designated Areas = 14,074 acres	Designated Areas in M districts = 10,254 acres

Figure 8: Zoning framework - Future with and without the Action

² The amount of land zoned for M and C8 was calculated in ArcGIS. An overlay was performed between all M and C8 zoning districts and NYC's Community Districts, which exclude water areas, certain parks and the airport areas.

Proposed Designated Areas in Manufacturing districts

The proposed Designated Areas in M districts are listed by Community District in Figure 9, and represented by the maps in Figure 10, and in more detail in Appendix B. These areas are the directly affected areas by the Proposed Action. They encompass portions of 27 Community Districts located in four boroughs of New York City.

**Directly affected areas
and number of existing self-storage facilities³**

Borough	Community District	Acreage of Proposed Designated Area	Existing self-storage facilities	Pre- construction self-storage
Bronx	1	362.5	7	
	2	815.5	1	
	3	49.6		
	4	3.5		
	6	17.3	1	
	9	167.8	3	
	10	150.4	3	
	12	131.7	2	1
Brooklyn	1	946.8	4	
	2	227.3		
	4	17.1		
	5	316.4	5	
	6	476.1	3	
	7	567.1	3	
	16	90.2		
	17	152.1	1	
	18	284.3	4	
Queens	1	634.5	3	
	2	951.1	8	
	5	387.3	4	1
	9	116.2	1	
	10	83.4		
	12	237.3	9	
	13	184.1		
Staten Island	1	640.0	1	
	2	1,725.7	2	
	3	518.7		
Total		10,254.1	65	2

Figure 9: Directly Affected Areas

³ The amount of land proposed to be classified as Designated Areas in M districts was calculated in ArcGIS. An overlay was performed between the proposed Designated Areas in M districts and NYC's Community Districts, which excluded water areas, certain parks and the airport areas.

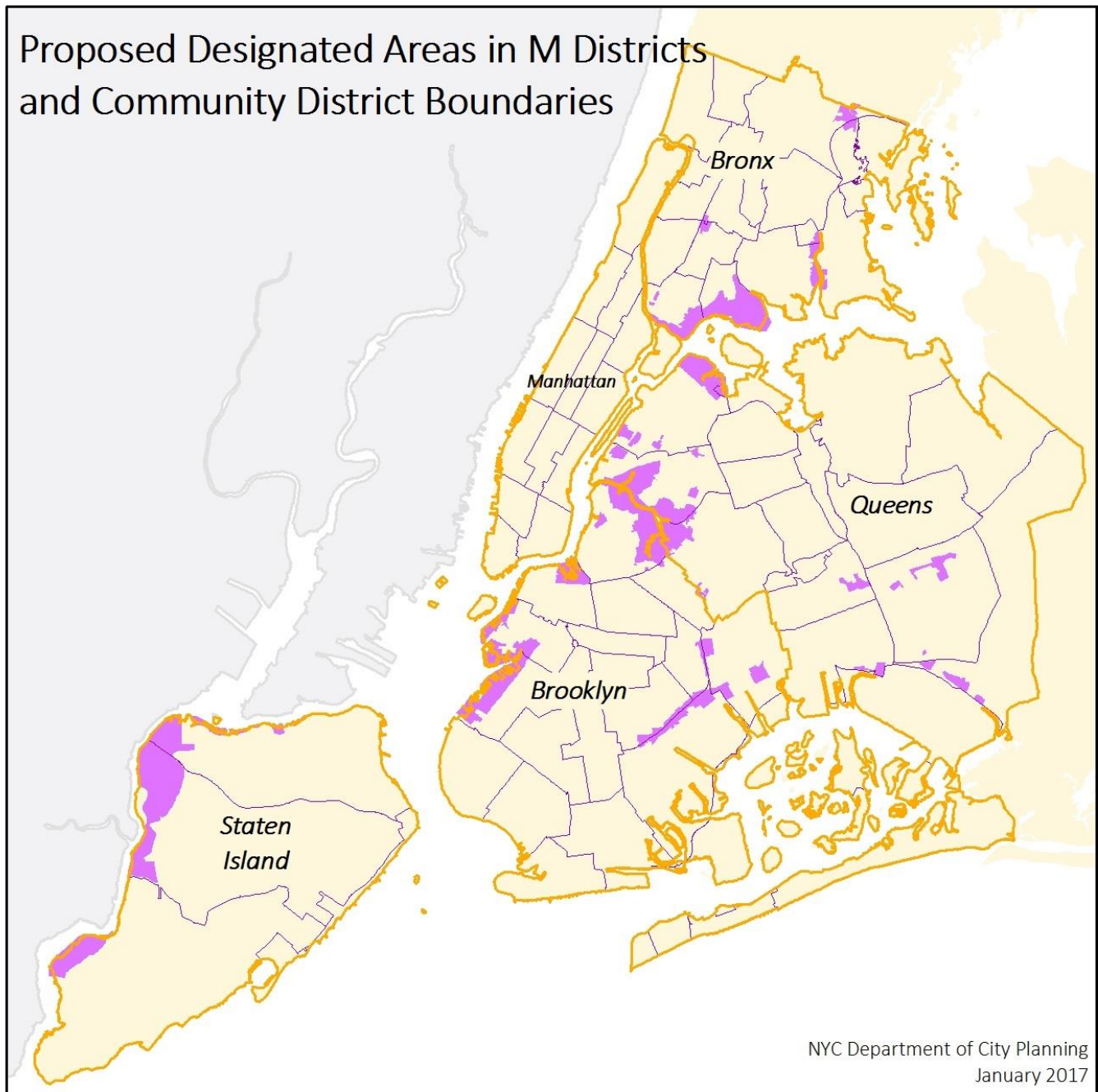


Figure 10: Proposed Designated Areas in M Districts

M and C8 districts outside of Designated Areas

Furthermore, the indirectly affected area is defined as all zoning districts that would continue to permit self-storage as-of-right, which are mapped in all five boroughs of New York City. They are referred to in this EAS as M and C8 districts outside of Designated Areas. These areas are dispersed in all boroughs and Community Districts of New York City (see Figure 11 and Figure 12). The citywide perspective allows for an assessment of the self-storage industry in a comprehensive manner, including the wider implications of the proposed text amendment, which may potentially have environmental effects beyond the proposed Designated Areas in M districts.

**M and C8 districts outside of Designated Areas
and number of existing self-storage facilities⁴**

Borough	Community District	Acres	Existing self-storage facilities	Under or pre-construction self-storage
Manhattan	1	31.0		
	2	310.0	2	
	3	39.6	3	
	4	324.6	11	
	5	143.0		
	6	38.3		
	7	2.2	2	
	8	43.6	1	1
	9	69.4	5	
	10	21.9	4	
	11	135.8	4	
	12	145.7	2	
Bronx	1	180.5	8	
	2	138.3		
	3	113.6	5	1
	4	177.9	5	1
	5	87.5	1	
	6	138.3	2	
	7	85.5	2	
	8	74.6	2	1
	9	111.2	3	
	10	111.3		

⁴ The amount of land zoned for M and C8 outside of Designated Areas was calculated in ArcGIS. An overlay was performed between all M and C8 zoning districts and NYC's Community Districts, which excluded water areas, certain parks and the airport areas.

	11	309.6	4	
	12	246.0	6	1
Brooklyn	1	492.2	1	
	2	249.1	13	
	3	142.6	1	
	4	123.5		
	5	205.9	6	
	6	268.0	3	
	7	277.0	4	
	8	94.5	7	
	9	40.7	3	
	10	115.0		
	11	174.8	2	
	12	240.6	1	
	13	239.8	4	
	14	33.1	1	
	15	111.1	1	
	16	56.0	2	
	17	69.4	4	
	18	170.7		
Queens	1	891.2	10	
	2	635.2	1	1
	3	76.3		
	4	87.4		1
	5	333.9	5	1
	6	62.2		
	7	913.5	4	
	8	57.3		
	9	318.4	4	
	10	23.4	2	
	11	196.8		
	12	287.0	6	
	13	176.6	3	
	14	891.2	3	
Staten Island	1	899.2	4	
	2	1,071.2	3	
	3	1,861.0	4	
Total		14,074.0	174	7

Figure 11: M And C8 districts outside of Designated Areas

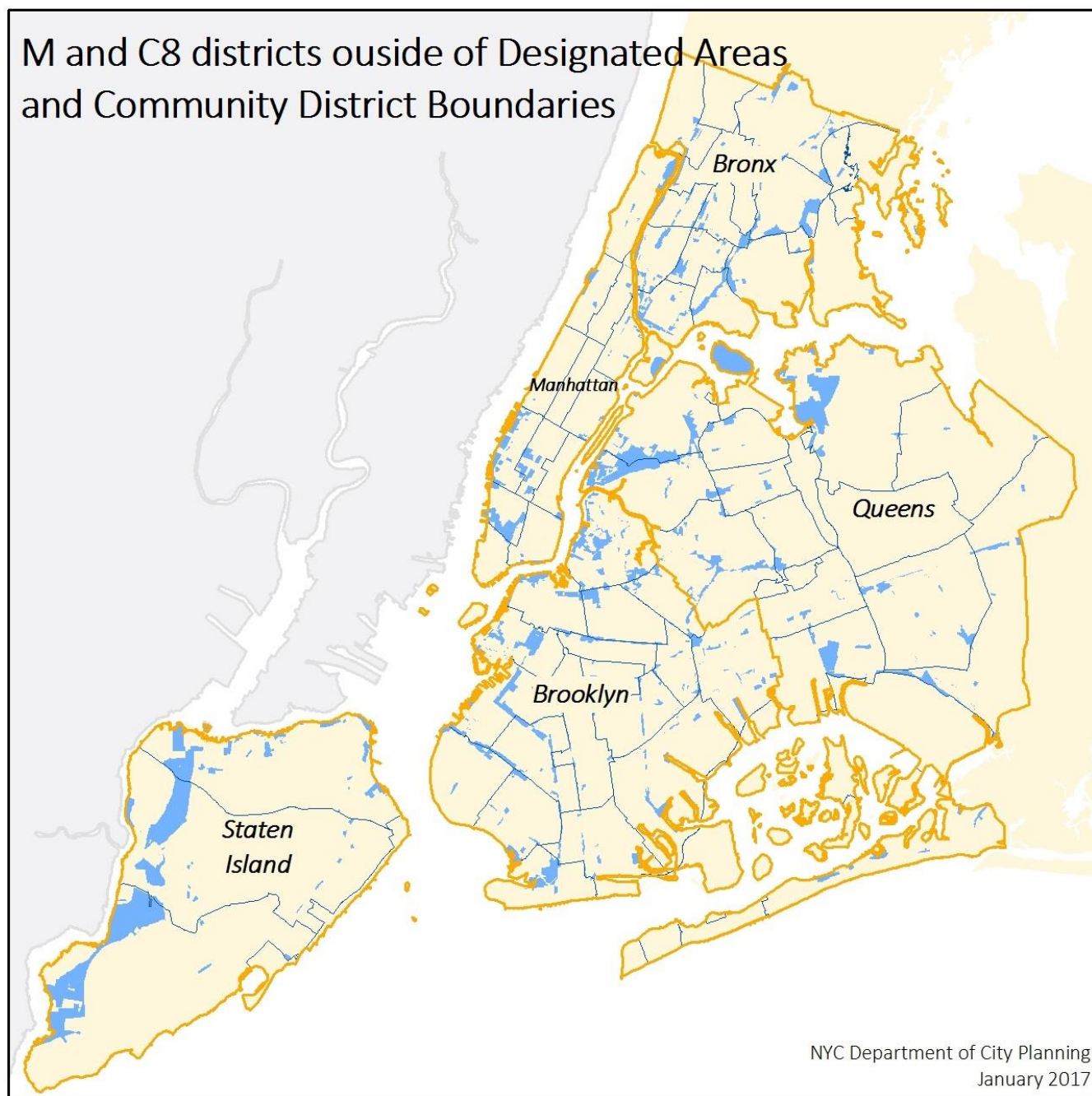


Figure 12: M and C8 districts outside of Designated Areas

III. Build Year

CEQR requires analysis of the project's effects on its environmental setting. For those projects that would be implemented quickly following approval, the current environment would be the appropriate environmental setting. However, proposed projects typically are completed and become operational at a future date, and therefore, the environmental setting is the environment as it would exist at project completion and operation. Therefore, future conditions must be projected. This prediction is made for a particular year, generally known as the "analysis year" or the "build year," which is the year when the proposed project would be substantially operational.

As discussed in the *CEQR Technical Manual*, for some generic actions, where the build-out depends on market conditions and other variables, the build year cannot be determined with precision. In these cases, per CEQR guidelines, a build year ten (10) years in the future is considered reasonable, as it captures a typical cycle of market conditions and represents a timeframe within which predictions of future development may be made without a high degree of speculation. This is a typical time frame for area-wide rezonings not associated with a specific development, since it is assumed to be the length of time over which developers would act on the change in zoning and the effects of the Proposed Action would be experienced. Therefore, an analysis year of 2027 will be used for this environmental review.

IV. Existing Conditions

A. Self-storage

In early 2017, there were approximately 240 self-storage facilities in New York City. The borough of Brooklyn had the most self-storage facilities, followed by Queens and the Bronx (see Figure 13). The majority of self-storage facilities are in M districts, since M districts are more widely mapped than C8 districts – the only other zoning districts where self-storage is currently allowed as-of-right. A number of self-storage facilities also exist outside of M or C8 districts (listed as Other, in Figure 13), but these facilities are either non-conforming uses or legal conversions in areas that were subsequently rezoned. As explained earlier, in New York City’s current market it is relatively unusual for a new self-storage facility to site in a residential district as a legal, non-conforming use, when a residential use could be developed as-of-right.

Overall, about one quarter of all self-storage facilities are located in the proposed Designated Areas in M districts, meaning that the large majority of facilities have been developed outside NYC’s most active industrial areas.

Number of self-storage facilities, by borough and zoning

	Total	Other	C8 district	M-district outside proposed Designated Area	M district in proposed Designated Area
Brooklyn	73	12	17	24	20
Bronx	54	8	7	22	17
Manhattan	35	18	3	14	
Queens	63	10	2	26	25
Staten Island	14		1	10	3
Citywide	239	48	30	96	65

Figure 13: Self-storage facilities by borough and zoning
Source: DCP January 2017, existing self-storage facilities (excludes pre-construction)

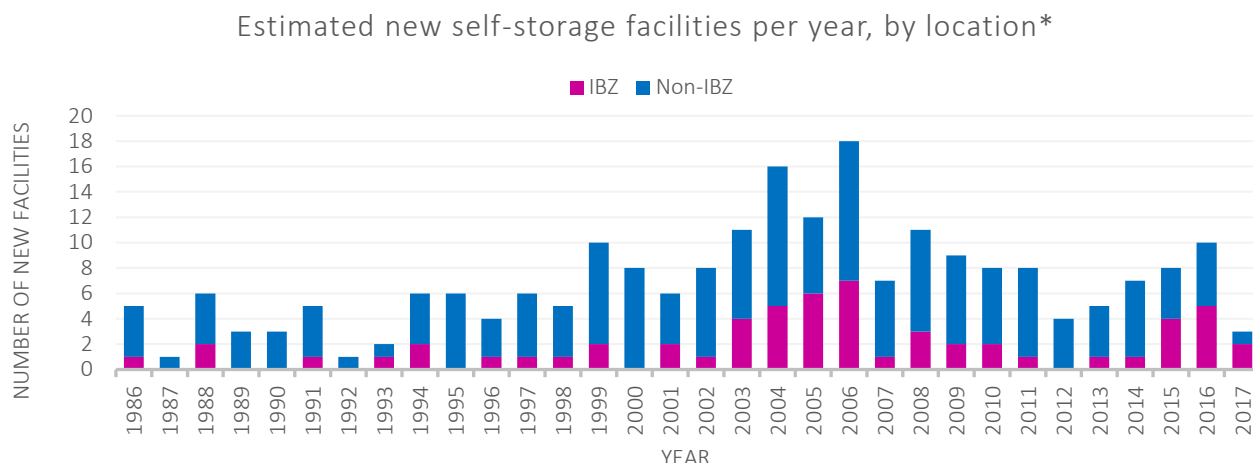


Figure 14: Estimated new self-storage facilities per year, by location
*Approx. 7 percent of existing facilities lack data and are not included in this chart

NYC Dept. of City Planning, January 2017. Sources: PLUTO v16 Year Built/Year Altered or DOB Permit database Year Building Permit Issued

The above chart⁵ (Figure 14) depicts the number of new self-storage facilities developed annually. The chart does not include approximately seven percent of existing self-storage facilities (N=17), because the build year of those facilities could not adequately be determined with the data sources at hand. Accordingly, the actual development numbers would be slightly higher than those represented in the chart.

In the 1980s and 1990s, there was only a modest amount of self-storage development in New York City. Around the year 2000, self-storage development became more prevalent, peaking in the mid-2000s and maintaining a relatively constant rate over the last decade. Between 2007 and 2016, the chart shows that an average of eight new facilities opened citywide on a yearly basis. Over the same time span, between 2007 and 2016, an average of about two self-storage facilities per year have opened in proposed Designated Areas in M districts, or one quarter of all self-storage development.

In the most recent years, it appears that the share of facilities being developed in proposed Designated Areas in M districts is growing: approximately 50 percent of the new facilities were located in Designated Areas. However, this trend is not clearly discernible, since the pre-construction pipeline does not follow such a pattern. As of mid-January 2017, there were 9 self-storage facilities in the pre-construction process. Four of the facilities in the pre-construction process will be built in Queens, and four in the Bronx (see Figure 15 below). Two of the nine self-storage developments in the pre-construction process are to be

⁵ Year estimates are based on two data sources: PLUTO v16, which is based on DOF data *Year Built/Year Altered*, or the DOB Permit database, *Year Building Permit Issued* (P or Q permits). These sources are not perfectly comparable and may contain certain errors. DCP uses these sources for a general indication of self-storage development trends, since there are no other, more reliable sources. The created charts are meant to depict general trends and should not be analyzed on a year-by-year basis. Due to potential data inaccuracies and the presence of certain market cycles, future self-storage development projections are based on general trends in the last decade, rather than recent short-term trends, which are typically less reliable.

developed in proposed Designated Areas in M districts, which reflects the last decade's average rate (25 percent), but is a lower share than in the last few years. Due to the inconclusive data, it is not possible to predict whether in the future without the proposed action, self-storage development would increasingly occur in the proposed Designated Areas in M districts, or whether the geographic development patterns would remain similar to those in the past.

Number of self-storage facilities in the pre-construction phase			
	Total	Outside IBZ	In IBZ
Bronx	4	3	1
Brooklyn			
Manhattan	1	1	
Queens	4	3	1
Staten Island			
Citywide	9	7	2

Figure 15: Pre-construction self-storage
Source: DCP January 2017, status based on DOB Permit Database

Although self-storage is thriving and many facilities are being developed, growth has not been uniform in all boroughs of NYC; there have been a handful of self-storage facilities that have closed. Two examples can be pointed to, where this has occurred: 847 11th Avenue in Manhattan was demolished and rebuilt as residential, and 517 W 29th Street is in the process of being demolished and was purchased by a developer of condos. While today there are only few examples of self-storage facilities closing, in the long-term DCP expects the re-conversion or demolition of self-storage facilities to become more common in parts of Manhattan and in downtown Brooklyn, where residential development is permitted and market conditions have changed significantly. However, currently this trend is too marginal to be quantified and it is not anticipated to become prevalent before 2027 (build year). Consequentially, this trend is not discussed further in this EAS.

V. Future No-Action Condition

A. Self-storage Citywide

Development patterns in the self-storage industry are anticipated to continue, with ongoing growth for the self-storage industry in NYC (REIS, 2015) and the city remaining undersupplied with this type of facility compared with the national average. It is not possible to project with certainty the number and location of self-storage facilities that will be developed in the No-Action condition within the proposed Designated Areas in M districts or in M and C8 districts outside of Designated Areas. However, in order to complete a thorough environmental analysis that enables the Department of City Planning to understand the potential impacts of the Proposed Action, a reasonable and conservative framework has been developed. This framework is based on self-storage development trends of the last ten years, which have been relatively constant.

<p>Number of self-storage facilities projected Citywide by the Build Year (No-Action)</p> <p>based on the continuation of the rate of self-storage development in the last ten years (2007 – 2016), amounting to 8.5 new self-storage development per year</p> <p>Citywide projection</p> <hr/> <p>9 self-storage facilities in pre-construction (next 1 year)</p> <p>+</p> <p>8.5 new facilities per year x 9 years</p> <p>9 + (9 x 8.5) ≈86</p>
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Figure 16: Citywide, self-storage No-Action

As shown by Figure 14, over the last decade, an average of 7.7 new self-storage facilities were built annually. Figure 14 does not include approximately seven percent of existing self-storage facilities (N=17), because the build year of those facilities could not adequately be determined. Accordingly, the actual development numbers would be slightly higher than those represented in Figure 14. For analytic purposes, it is assumed that these seventeen facilities were completed within the last two decades. Accordingly, 0.85 (17 facilities/20 years = 0.85 facilities per year) self-storage facilities were added to the yearly average in order to account for these seventeen self-storage facilities. Adding 0.85 to the 7.7 yearly self-storage facilities of Figure 14, the total of new self-storage facilities per year over the last decade would amount to an average of 8.5.

For the purpose of environmental analysis, DCP estimates that within the next year, the nine self-storage developments that are currently in the pre-construction process will be completed (see Figure 15) For the remaining nine years until the Build Year, beyond the pre-construction pipeline, it is assumed that the last decade's rate of self-storage development will continue. As explained above, the rate of self-storage development in NYC in the last decade averaged about 8.5 new self-storage facilities per year. Projecting

this rate of self-storage development into the future is reasonable and conservative, since the self-storage industry expanded significantly in New York City in the last decade, and is expected to continue to grow, and thus maintain a similar development trend until the Build Year. Accordingly, an additional 8.5 self-storage facilities per year are expected to be built until the Build Year. As shown by Figure 16, this amounts to a total of approximately eighty-six projected new self-storage facilities citywide by the time of the Build Year.

Although approximately eighty-six new facilities are anticipated, the location of these facilities will most likely not be evenly distributed across the boroughs. Given that only one of the self-storage developments in the pre-construction phase is located in Manhattan, and none are in Staten Island, and that these boroughs' real estate market conditions tend to result in other types of development, it is expected that the large majority of the projected self-storage facilities would site in the Bronx, Brooklyn, and Queens.

Regarding the customer base of self-storage facilities, which are primarily households with a mix of business tenants, due to a lack of specific information, the future No-Action Condition regarding self-storage customers cannot be determined. It is plausible to assume a continuation of the existing condition, in which the majority of self-storage units will still be leased by households, and that approximately 20-30 percent of self-storage units would be leased by small businesses, according to information provided by the industry.

B. Geographic distribution of self-storage facilities in NYC in No-Action Condition

To the extent that recently observed trends in proposed Designated Areas in M districts will continue, DCP forecasts these areas to generally maintain a similar rate of industrial employment versus non-industrial employment and to globally remain more industrial than the M and C8 districts outside of Designated Areas.

As explained above, the rate of self-storage development in NYC in the last decade averaged about 8.5 new self-storage facilities per year, meaning that the number of projected new self-storage facilities to be developed citywide by the time of the Build Year amounts to approximately eighty-six (Figure 16). This estimate is based on the assumption that self-storage will continue to proliferate and grow, given that New York City will remain relatively undersupplied with this type of facility, compared with the national average, and is deemed to be conservative for the purpose of the analytic framework.

Although eighty-six facilities are anticipated to be built, the location of these facilities is not anticipated to be evenly distributed across the boroughs. Over the last decade (2007 – 2016), about one quarter of self-storage development has occurred in proposed Designated Areas in M districts and the other three quarters has for the most part taken place in M and C8 districts outside of Designated Areas.

M and C8 districts outside of Designated Areas

Over the last decade, the majority of self-storage development has occurred in M and C8 districts outside of Designated Areas. However, considering that population and employment are growing in New York City, these areas – typically less industrial in character, often closer to transit and residencies, tending to consist of smaller lots – may gain an increasing share of development in commercial, community facility and other uses. It is possible that self-storage would decrease in competitiveness compared to other uses in these areas, and may increasingly occur in the proposed Designated Areas in M districts. In that sense, the ratio of self-storage facilities built in proposed Designated Areas in M districts versus other areas could change, with proposed Designated Areas in M districts absorbing an increasingly larger share of self-storage development. Because data regarding whether such a trend already exists is inconclusive (see Existing Conditions), it is assumed that the future share of new facilities siting in Designated areas in M districts will resemble the patterns of the last decade. Understanding that the total number of projected self-storage facilities amounts to 8.5 per year in the No-Action Condition (see Figure 16), and past rates of self-storage development place about three quarter of these facilities in M and C8 districts outside of Designated Areas, approximately 6.5 self-storage facilities would be developed on a yearly basis in M and C8 districts outside of Designated Areas (see Figure 17).

Proposed Designated Areas in Manufacturing districts

The number of self-storage developments within proposed Designated Areas in Manufacturing districts amounts to an average of about two self-storage facilities per year between 2007 and 2016, representing approximately one quarter of all self-storage development (see Figure 14). In the most recent years, it appears that the share of facilities being developed in proposed Designated Areas in M districts is growing, but the pre-construction pipeline does not follow this pattern (see Figure 15), and so the data remains inconclusive. 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 20 (see Figure 17). This includes also the two self-storage facilities which are in the pre-construction phase (see Figure 15).

According to Figure 16 and Figure 17, the number of new self-storage facilities projected by the time of the Build Year amounts to eighty-six. This is a conservative estimate for the purpose of this analysis, and a generous assessment of the amount of self-storage development that may occur over the next decades, since it is based on the last decade's rate of self-storage development – a decade, which marked a significant expansion period for the self-storage industry.

Number of self-storage facilities projected by the Build Year (No-Action) by Location	
Based on the continuation of the rate of self-storage development in the last ten years (2007 – 2016), amounting to 8.5 new self-storage development per year on a citywide basis: one quarter in Designated Areas, and three-quarters in M and C8 districts outside of Designated Areas.	
Proposed Designated Areas in M districts	Citywide, excl. proposed Designated Areas
2 self-storage facilities in pre-construction (next 1 year); and	7 self-storage facilities in pre-construction (next 1 year); and
2 new facilities per year x 9 years	6.5 new facilities per year x 9 years
2 + (9 x 2)	7 + (9 x 6.5)
≈20	≈ 66

Figure 17: Detailed, self-storage No-Action

C. Projections

In Designated Areas in M districts, these projected self-storage developments 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. As described in Attachment A, self-storage tends to occupy large sites along designated truck routes, in a context where such large sites are becoming increasingly scarce. Since those sites are crucial locations for many industrial businesses and are in limited supply in NYC, their use for self-storage is regarded as a lost opportunity in proposed Designated Areas in Manufacturing districts, which are the City’s target areas for the realization of economic development goals supporting a range of industrial and other employment-generating business activities.

In the No-Action Condition, self-storage would occupy approximately twenty large lots in proposed Designated Areas in M districts within ten years, which could be suitable for otherwise hard-to-site, large scale, employment-supporting or essential industrial uses such as logistics, wholesale and distribution, construction and film production. The number of foregone opportunities for industrial development could be considerable, given the City’s active efforts to maintain and grow industrial employment opportunities in IBZs.

Without the Proposed Action, existing trends are expected to continue and scarcity for large, industrial sites may become more acute. 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.

VI. Future With-Action Condition

A. Self-storage Citywide

The Proposed Action introduces a discretionary approval process by CPC Special Permit for self-storage development within proposed Designated Areas in M districts. CPC Special Permits present a disincentive to the development of self-storage development facilities, since obtaining the Special Permit can add significant time, costs and uncertainty to a project. Accordingly, it is reasonable to assume that a CPC Special Permit would have the effect of slowing the rate at which self-storage is developed in the proposed Designated M districts and increasing the rate at which it is developed in the areas that remain as-of-right.

Overall, by 2027, the Proposed Action may lead to a somewhat reduced number of additional self-storage facilities in New York City; some self-storage projects that may have occurred in the No-Action Condition may never get realized. Because the directly affected area covers a considerable amount of the area where self-storage is permitted as-of-right today (42 percent, see Figure 8), it can be expected that the Proposed Action would to a certain extent, reduce the number of sites available to developers of self-storage, who would seek opportunities in neighboring municipalities. In this case, the Proposed Action would likely increase self-storage development in counties such as Westchester and Nassau in New York State, or Bergen and Hudson in the state of New Jersey. Here, land is typically more widely available and also less expensive than in New York City. However, considering the importance of the New York City market for the self-storage industry, it is generally expected that the industry will continue to seek siting opportunities in New York City, despite the Proposed Action. For instance, self-storage development that would have located in the Designated Areas in Manufacturing districts may seek siting opportunities in M and C8 districts in New York City, where the Special Permit is not proposed.

As in the No-Action Condition, 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 has been developed, which is based on past self-storage development trends and other plausible, well-explained assumptions. This framework allows for an analytical analysis, but is not intended to capture the character or totality of future self-storage development, which is to a large extent unknown.

The number of self-storage facilities that would not be built in New York City due to the Proposed Action cannot be determined with precision. Since demand for self-storage is very strong and the industry is highly lucrative, it is expected that the industry will continue to seek and find siting opportunities in New York City, despite the Proposed Action. The Proposed Action would apply to 42 percent of the land area where self-storage is currently permitted as-of-right, and where on average one quarter of self-storage development has occurred. Accordingly, the Proposed Action does not include the areas, where the majority of self-storage development has occurred, and zoning districts permitting self-storage development as-of-right would remain in all Community Districts in New York City. Furthermore, in some instances, developers will likely apply and receive a Special Permit to develop facilities in proposed Designated Areas in M districts (see next section for more details). Considering all of these factors, it is expected that the Proposed Action will not as much affect the total number of new self-storage developments in NYC, as it will affect the *location* of those new facilities within the city boundaries. Hence, for the purpose of this analysis, it is projected that the Proposed Action would result in the change of

location of one new self-storage facility per every two years beyond city boundaries. This implies that under the With-Action Condition, the number of projected new self-storage facilities would amount to 8 per year until the Build Year on a citywide basis, as compared to the 8.5 per year under the No-Action Condition.

The Proposed Action is not expected to alter any self-storage developments that are currently in the pre-construction phase (see Figure 15). Operating under the assumption that the building permits would be issued before the date of enactment of this proposed text amendment, the nine projects that are currently in the pre-construction phase are anticipated to be completed. This assumption is reasonable, since developers need to obtain only a building permit and complete foundations, if constructing a new building, in order to comply with the vesting terms and receive permission to finish the project. Vesting rules are outlined in Section 11-30 of the *NYC Zoning Resolution* and have been written in order to include an adequate amount of flexibility and not impose undue hardship on property owners. If the foundations are started, but not completed, the building permit would lapse, but the developer may still apply to the BSA to renew the building permit to complete the foundations. The BSA may grant an extension of six months. Furthermore, property owners, aware of proposed zoning text amendments, tend to comply with the vesting rules by obtaining building permits and completing foundations. Accordingly, any project that is currently already in the pre-construction process is likely to be completed, and is not expected to be affected by the Proposed Action.

Number of self-storage facilities projected by the Build Year (With-Action), Citywide

Based on the continuation of the rate of self-storage development in the last ten years (2007 – 2016), and including a net reduction of one facility per two years due to the Proposed Action.

Citywide projection

9 self-storage facilities in pre-construction (next 1 year)

+

8 new facilities per year x 9 years

$9 + (9 \times 8) \approx 81$

Figure 18: Citywide, self-storage With-Action

Overall, the Proposed Action would likely lead to slightly fewer self-storage facilities in NYC by the Build Year. This implies that the Proposed Action would slightly constrain supply and could potentially diminish the self-storage industry's ability to satisfy market demand, which in return would lead to a modest increase in the price of self-storage units. The extent to which this would occur, and the prices at which self-storage units would be leased, are difficult to estimate. However, it is plausible to assume that the slight increase in self-storage rates due to the Proposed Action would help the operating side of the self-storage industry, and also increase the value of pre-existing grandfathered self-storage facilities, while the development side would experience a small number of lost opportunities and slightly diminished revenues.

The potential modest rate increases for self-storage may affect certain households' and small businesses' ability to rent self-storage units or their ability to pay for such units, if demand stays strong. Households and businesses alike may have to travel further to access units in the desired price range or rent smaller units, resulting in some inconvenience. Furthermore, there may also be a certain shift in customer demand. Businesses may increasingly lease warehousing space, instead of self-storage units, and the on-demand storage model may become prominent. This alternative business model in the household storage market is gaining popularity. A shift in customer preferences, away from self-storage and toward on-demand storage, would reduce the demand for self-storage and consequently also the number of self-storage facilities developed in the future.

B. Geographic distribution of self-storage facilities in NYC in With-Action Condition

Regarding the distribution of self-storage facilities within New York City's five boroughs, DCP expects that the majority of the self-storage facilities would site in the Bronx, Brooklyn, and Queens. However, the Proposed Action is expected to have a certain effect on the siting locations city wide, since a Special Permit would be required in proposed Designated Areas in M districts.

Estimating the location of self-storage facilities that may get developed due to the Proposed Action is complex, particularly since self-storage facilities typically serve residents living within a few-mile radius (SSA, 2015a). This means that location and access are one of the most important factors in new self-storage development, and that the industry – to the extent that it is permitted by zoning – seeks to disperse facilities in the city, in order to limit competition. Because New York City is so densely inhabited, multiple self-storage facilities may serve the same neighborhood. Nevertheless, it can be expected that once a certain threshold of self-storage units in a given neighborhood is reached, the market is saturated and new self-storage development is no longer profitable within that area.

Proposed Designated Areas in Manufacturing districts, With-Action Condition

DCP projects less self-storage development in Designated Areas in Manufacturing districts under the With-Action Condition than the No-Action Condition. The introduction of a new discretionary approval process is likely to present a disincentive to the development of self-storage since some self-storage developers may be reluctant to undergo a discretionary review process. Yet, demand for self-storage is not close to being saturated, according to the New York Self Storage Association and is highly lucrative. Accordingly, it is plausible to assume that the Special Permit discretionary review process would not deter all self-storage developers, and that a certain amount of Special Permits may be applied for. It is expected that those CPC Special Permit applications would be granted, since the objectives and findings of the proposed Special Permit would permit self-storage development on sites that are suboptimal for industrial businesses. As detailed by the findings of the Special Permit, this includes sites that: are smaller, cannot be easily accessed by major streets, and are not located in areas where there is active investment in employment-intensive industrial uses. The Department of City Planning expects that there would be many sites within the proposed Designated Areas in M districts, where such findings could be met (see examples under Attachment A, Figure 6 and Figure 7).

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

The existing CPC Special Permit for large retail establishments, outlined in Section 74-922 of the *NYC Zoning Resolution*, is considered to share several similarities with the proposed self-storage CPC Special Permit. Similar to the Proposed Action, the 74-922 CPC Special Permit targets a land-intensive, non-industrial use: large retail establishments, described as department stores, carpet, rug, linoleum or other floor covering stores, clothing or clothing accessory stores, dry goods or fabric stores, food stores, furniture stores, television, radio, phonograph or household appliance stores, or variety stores. Furthermore, the 74-922 CPC Special Permit applies to Manufacturing districts, and was introduced in 1974, at least partially with the intention of protecting Manufacturing districts and ensuring that large retail establishments wouldn't impair the essential character or the future use of or development of the area. The CPC report (CP 22683), dated July 10th 1974, states on pages 1 and 2:

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

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

An analysis of the number of applications received for the 74-922 CPC Special Permit shows that, since the Special Permit's inception in 1974, 67 Special Permits have been processed. In the ten-year timeframe between 2007 and the end of 2016, ten Special Permit applications were completed, or an average of one CPC Special Permit per year. Using recent application patterns for the 74-922 CPC Special Permit, DCP projects that there would be one application per year for the CPC Special Permit for self-storage (see Figure 19).

The Proposed Action is not expected to alter any self-storage developments that are currently in the pre-construction phase (see Figure 15). Operating under the reasonable assumption that the building permits would be issued before the date of enactment of this proposed text amendment, the two developments that are currently in the pre-construction phase in proposed Designated Areas in M districts would presumably be completed. Accordingly, under the With-Action Condition, assuming all pre-construction projects are realized and one CPC Special Permit is applied for and granted on a yearly basis (amounting to a total of nine Special Permits), a total of eleven new self-storage facilities would be built in the proposed Designated Areas in M districts until the Build Year (see Figure 19).

M and C8 districts outside Designated Areas, With-Action Condition

As discussed earlier, beyond projects in the pipeline, over the next ten years, the projected number of new self-storage facilities is eight facilities per year on a citywide basis. This is because demand for self-storage is expected to follow the patterns of the last decade and will remain high. As explained above, it is expected that one self-storage facility per year will be built in a Designated Area in M districts. All other self-storage facilities would be developed in M and C8 districts outside of Designated Areas, which are the only areas where self-storage development could still occur as-of-right (see Figure 19). It is expected that self-storage developers would increasingly seek development opportunities in M and C8 districts outside of Designated Areas. These other areas mapped and dispersed in all boroughs and Community Districts of New York City (see Figure 11 and Figure 12).

Since the Proposed Action is not expected to alter any self-storage developments that are currently in at least the pre-construction phase, the seven self-storage facilities, which are in the pre-construction phase in the M and C8 districts outside of Designated Areas, would assumedly not be affected by the Proposed Action and be completed.

As a result, under the With-Action Condition, 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 (see Figure 19).

Number of self-storage facilities projected by the Build Year (With-Action) by Location based on the continuation of the rate of self-storage development in the last ten years (2007 – 2016), including a net reduction of one facility per two years due to the Proposed Action, and assuming 1 Special Permit per year for development in Designated Areas.	
Proposed Designated Areas in M districts	Citywide, excl. Designated Areas
2 self-storage facilities in pre-construction (next 1 year); and	7 self-storage facilities in pre-construction (next 1 year); and
1 Special Permit x 9 years	7 new facilities per year x 9 years
2 + (9 x 1)	7 + (9 x 7)
≈11	≈ 70

Figure 19: Detailed, self-storage With-Action

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.

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.

It is anticipated that a majority of the self-storage developments that would change location would site in M and C8 districts that adjoin Designated Areas in Manufacturing districts, which already have several self-storage facilities (see Figure 11). Here, existing market conditions already demonstrate a real demand for self-storage development. As such, DCP would expect the modest increase in self-storage development to take place in M and C8 districts within a couple-mile radius of proposed Designated Areas in M districts that have already experienced a greater amount of self-storage development (see Figure 11). Examples of such places include: Long Island City, Jamaica, Port Morris, Flatlands/Fairfield, Zerega and Southwest Brooklyn. The Designated Areas in the M districts in portions of those neighborhoods all have five or more self-storage facilities. As a result of the Proposed Action, the M and C8 districts within a couple-mile radius to these Designated Areas in Manufacturing districts would be expected to experience a minor increase in self-storage development. The boroughs of Brooklyn, Queens and Bronx each have two of these proposed Designated Areas in M districts, meaning that the areas, where such a modest increase could be projected, are relatively evenly distributed in the City.

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.

C. Projections

On the whole, it is expected that the Proposed Action would lead to slightly fewer self-storage facilities in NYC by the Build Year. While the No-Action Condition projected an additional eighty-six new self-storage facilities in NYC within the next decade, the With-Action Condition projects a total of eighty-one new self-storage facilities. This represents five fewer facilities in the With-Action condition, compared to the No-Action condition, by the time of the Build Year. Only sites, which are suboptimal for industrial businesses, would meet the findings of the CPC Special Permit, and could still be developed for self-storage in Designated Areas in M districts.

DCP projects under the With-Action Condition, that there would be one application per year for the CPC Special Permit for self-storage in proposed Designated Areas in M districts, resulting in a total of eleven self-storage facilities in Designated Areas in M Districts until the Build Year (see Figure 19). Accordingly, the Proposed Action would result in a decrease of nine self-storage facilities in proposed Designated Areas in M districts by the time of the Build Year, and would ensure that the eleven projected self-storage facilities would not occupy sites that would be optimal industrial business siting opportunities.

Without the Proposed Action, large, industrial sites may become increasingly scarce. Comparing the With-Action to the No-Action Condition, it is expected that industrial businesses will experience decreased difficulties in finding opportunities to locate or expand in NYC's most active industrial areas, since approximately twenty large, industrial lots, located near truck routes and highways, should increasingly remain available for these businesses until the Build Year. As such, the With-Action Condition is expected

to result in a greater availability of sites in Designated Areas in Manufacturing districts for the potential development of industrial businesses, which provide essential industrial services, offer a greater number of jobs to New Yorkers and support the infrastructure of NYC.

The Proposed Action alone is not expected to 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. Although the With-Action Condition does not preclude other, non-industrial uses from occupying the sites where self-storage would not be developed due to the Proposed Action, these other uses are relatively uncommon in the proposed Designated Areas in M districts, which are NYC's most active industrial areas. Non-industrial uses have gravitated to M districts outside of Designated Areas, which likely have more desirable locations for these uses. Non-industrial uses, other than self-storage, are furthermore less likely to seek large lots along Designated Truck Routes in Designated Areas.

The Proposed Action solely aims to improve future siting opportunities for industrial businesses in NYC, in a context where industrial facilities are already permitted as-of-right in M districts. Although the Proposed Action itself would not induce development, the occurrence of industrial development is plausible, due to the existence of a variety of economic development policies in place in IBZs, including the 10-Point Industrial Action Plan, which incentivize industrial development through amongst others tax exemptions, subsidies and the provision of specific services. DCP cannot predict with certainty the kinds of businesses that may occupy a given site. For a complete analysis, the DEIS will analyze, by reviewing representative examples of industrial development and following CEQR guidelines, the potential environmental effects of the placement of an industrial business.

VII. No-Action and With-Action Condition Compared

The No-Action Condition forecasted that eighty-six new self-storage facilities would be developed in New York City by the time of the Build Year: twenty in the proposed Designated Areas in M districts, and sixty-six in the M and C8 districts outside of Designated Areas. This number took into consideration the pre-construction pipeline, and projected an average of 8.5 new facilities per year beyond the pipeline. This estimate is deemed to be conservative for the purpose of this analysis and a generous assessment of the amount of self-storage development that may occur over the next decade.

The With-Action Condition projected a total of eighty-one new self-storage facilities on a citywide basis, leading to five fewer facilities by the time of the Build Year compared to the No-Action Condition (see Figure 20). Eleven new self-storage facilities would be built in proposed Designated Areas in M districts, and 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. When comparing the No-Action to the With-Action Condition, this represents a decrease in nine facilities in proposed Designated Areas in M districts, and an increase in four facilities in the M and C8 districts outside Designated Areas in M-districts by the time of the Build Year.

No-Action and With-Action Condition Comparison		
Number of self-storage facilities projected by the Build Year		
	Proposed Designated Areas in M districts	Citywide, excl. Designated Areas
No-Action Condition	≈20	≈ 66
With-Action Condition	≈11	≈ 70

Figure 20: Comparison of No-Action and With-Action Condition

Overall, the With-Action Condition is expected to achieve the Purpose and Need of the Proposed Action, as outlined in Attachment A. The detailed and site-specific review process for new self-storage developments in Designated Areas in Manufacturing districts would help to better preserve potential industrial development sites by ensuring that self-storage would only get built on sites that are not optimal for industrial businesses. Ensuring the availability of large industrial lots as future industrial business locations, in a context where such businesses are growing and are already experiencing difficulties to operate and expand their NYC base, is a crucial component of the Industrial Action Plan. Importantly, the 10-point Industrial Action Plan is accompanied by a series of economic development measures targeting IBZs, which are oriented towards enabling industrial businesses to remain and grow in Industrial Business Zones.

ATTACHMENT C: PRELIMINARY SCREENING ANALYSES

As detailed in Attachment A, “Project Description,” the Department of City Planning proposes a citywide zoning text amendment to introduce a Special Permit under the jurisdiction of the City Planning Commission for all new self-storage development in Designated Areas in M districts. By introducing a 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 siting opportunities for industrial, more job-intensive businesses in Designated Areas in Manufacturing Districts.

This Environmental Assessment Statement was prepared based on the guidelines established in the 2014 *CEQR Technical Manual*. Preliminary screening analyses will be conducted for the Proposed Action using the guidelines presented in the *CEQR Technical Manual*, to determine whether a more detailed analysis of a given technical area is appropriate. A more detailed assessment for adverse impacts is generally conducted when the preliminary assessment cannot definitively rule out the potential for significant adverse impacts. These assessments – both preliminary and detailed – will be conducted in the Draft Environmental Impact Statements (DEIS).

Consistent with *CEQR Technical Manual* guidelines, the Proposed Action is analyzed in this EAS as a “generic action.” Due to its broad applicability, it is difficult to predict the universe of sites where development would be affected by the Proposed Action. According to the *CEQR Technical Manual*, generic actions are programs and plans that have wide application or affect the range of future alternative policies. Usually these actions affect the entire city or an area so large that site-specific description or analysis is not appropriate.

I. Land use, zoning, and public policy

A land use analysis characterizes the uses and development trends in the area that may be affected by a Proposed Action, and determines whether a Proposed Action is either compatible with those conditions or whether it may affect them. Similarly, the analysis considers the action's compliance with, and effect on, the area's zoning and other applicable public policies. This chapter will analyze the potential impacts of the Proposed Action on land use, zoning, and public policy, pursuant to the methodologies presented in the *CEQR Technical Manual*.

The Proposed Action’s potential for impact on land use, zoning, and public policy, will be explored in a Draft Environmental Impact Statement (DEIS).

II. Socioeconomic conditions

This chapter assesses whether the Proposed Action would result in significant adverse impacts on socioeconomic conditions. As described in the *CEQR Technical Manual*, the socioeconomic character of an area includes its population, housing, and economic activities. Socioeconomic changes may occur when a

project directly or indirectly changes any of these elements. Such socioeconomic changes include: displacement of residential population, businesses or employees; a new development that is markedly different from existing uses and activities within the neighborhood; an adverse effect on conditions in the real estate market in the area or an adverse effect on socioeconomic conditions in a specific industry. The objective of the CEQR analysis is to disclose whether any changes created by the action would have a significant adverse impact compared to the future No-Action condition.

A. Direct and indirect residential displacement

Direct displacement (also called primary displacement) is the involuntary displacement of residents or businesses from a site or sites directly affected by a proposed project. Examples include a proposed redevelopment of a currently occupied site for new uses or structures, or a proposed easement or right-of-way that would take a portion of a parcel and thus render it unfit for its current use. The occupants and the extent of displacement are usually known, and the disclosure of direct displacement can therefore focus on specific businesses and a known number of residents and workers.

Indirect displacement (also known as secondary displacement) is the involuntary displacement of residents, businesses, or employees that results from a change in socioeconomic conditions created by the proposed project.

Although the Proposed Action is not expected to impact residential displacement, the Draft Environmental Impact Statement (DEIS) will assess the Proposed Action's potential to impact this technical area.

B. Direct and indirect business and institutional displacement

The *CEQR Technical Manual* defines direct business and institutional displacement as the involuntary displacement of businesses from the site of (or a site directly affected by) a Proposed Action.

In terms of indirect business and institutional displacement, the objective of the preliminary assessment is to determine whether the Proposed Action would introduce trends that would make it more difficult for existing businesses to remain in the area. In most cases, the issue for indirect displacement of businesses is that an action that markedly increase property values and rents throughout the study area, making it difficult for some categories of businesses to remain in the area. Additionally, indirect displacement of businesses may occur if a project directly displaces any type of use that either directly supports businesses in the area or brings a customer base to the area for local businesses, or if it directly displaces residents or workers who form the customer base of existing businesses in the area. Such displacement can be of concern when it would result in changes to land use, population patterns, or community character.

An assessment of any potential impacts on direct and indirect business and institutional displacement will be explored in the DEIS.

C. Adverse effects on specific industries

According to the *CEQR Technical Manual*, a Proposed Action may have a significant adverse impact on specific industries if the action significantly affects business conditions in any industry or category of business within or outside of the study area.

The Proposed Action would introduce a CPC Special Permit for the development of self-storage in Designated Areas in Manufacturing districts. The RWCDs projected less self-storage development taking place in Designated Areas in Manufacturing Districts under the With-Action Condition than under the Without-Action Condition, since the Proposed Action presents a disincentive to the development of self-storage facilities.

According to data DCP has collected, 33 percent of existing conforming self storage facilities are located in IBZs. This is a significant share of self-storage facilities in NYC. Furthermore, the Designated Areas in M Districts represent a considerable share of the areas in NYC where self-storage is currently permitted by zoning (M and C8 districts). As such, it is determined that the Proposed Action has the potential to significantly affect business conditions in the self-storage industry.

Based on the guidelines of the *CEQR Technical Manual*, a detailed assessment of adverse effects on specific industries is warranted and will be explored in-depth in a Draft Environmental Impact Statement (DEIS).

III. Community facilities and services

Community facilities, as defined under CEQR, include public or publicly funded schools, hospitals, libraries, day care centers, and fire and police protection. Direct effects occur when a particular action physically alters or displaces a community facility, whereas indirect effects result from increases in population which create additional demand on service delivery. The demand for community facilities and services is directly related to the type and size of the new population generated by a Proposed Action. New residential developments tend to affect facilities, such as public schools, day care centers, libraries, and hospitals. According to the *CEQR Technical Manual*, a detailed community facility analysis is conducted when a Proposed Action would have a direct or indirect effect on a community facility.

The proposal is not anticipated to result in any residential development. Nonetheless, for conservative purposes, a preliminary screening assessment of any potential impacts on community facilities and services will be explored in the DEIS.

IV. Open space

Open space is defined as publicly or privately owned land that is publicly accessible and operates, functions, or is available for leisure, play, or sport, or set aside for the protection and/or enhancement of the natural environment. An analysis of open space is conducted to determine whether or not a Proposed Action would have direct effects resulting from the elimination or alteration of open space, increased noise or pollutant emissions, odors, or shadows on public open space; and/or an indirect effects resulting from overtaxing available open space.

An open space assessment may be necessary if a Proposed Action could potentially have a direct or indirect effect on open space resources in the project area. A direct effect would, “physically change, diminish, or eliminate an open space or reduce its utilization or aesthetic value.” An indirect effect may occur when the population generated by a Proposed Action would be sufficient to noticeably diminish the ability of an

area's open space to serve the existing or future population. According to the guidelines established in the *CEQR Technical Manual*, an action that would add fewer than 200 residents or 500 employees, or a similar number of other users to an area is typically not considered to have indirect effects on open space.

An assessment of any potential impacts on open space will be explored in the DEIS relying on a prototypical analysis, because it is not possible to evaluate the impacts of any specific development, considering that the specific location of future development projects is unknown.

V. Shadows

The *CEQR Technical Manual* notes that a shadow assessment should be undertaken for actions that result in new shadows long enough to reach a publicly accessible open space (except within an hour and a half of sunrise or sunset), historic landscape or other historic resources (if the features that makes the resource significant depends on sunlight), or other resources of concern such as natural resources. Shadow assessments are typically prepared for actions resulting in structures 50 feet high or taller, and for shorter structures adjacent to important features such as parks, historic resources, or important natural resources.

It is not possible to evaluate the impacts of any specific development, as the specific location of future development projects is unknown. Therefore, a shadow assessment, using prototypical development scenarios, will be provided to determine how project-generated shadows would affect sunlight-sensitive resources. The shadow assessment would be coordinated with the open space, historic and cultural resources, and natural resources analyses and would be conducted in accordance with *CEQR Technical Manual* methodologies.

VI. Historic and cultural resources

Historic and cultural resources include both architectural and archaeological resources. Architectural resources generally include historically important buildings, structures, objects, sites, and districts. Archaeological resources are physical remains, usually subsurface, of the prehistoric, Native American, and historic periods—such as burials, foundations, artifacts, wells, and privies. This includes designated New York City Landmarks (NYCLs) and Historic Districts; properties calendared for consideration as NYCLs by the New York City Landmarks Preservation Commission (LPC) or determined eligible for NYCL designation (NYCL-eligible); properties listed on the State and National Register of Historic Places (S/NR) or formally determined eligible for S/NR listing (S/NR-eligible), or properties contained within a S/NR listed or eligible district; properties recommended by the New York State Board for listing on the S/NR; National Historic Landmarks (NHLs); and potential historic resources (i.e., properties not identified by one of the programs listed above, but that appear to meet their eligibility requirements).

Although it is not possible to evaluate the impacts of any specific development, as the specific location of future development projects is unknown, the historic and cultural resources assessment in the DEIS will analyze the potential for significant adverse impacts based on prototypical scenarios. If warranted, a detailed analysis will be completed.

VII. Urban design and visual resources

An area's urban components and visual resources together define the look and character of the neighborhood. The urban design characteristics of a neighborhood encompass the various components of buildings and streets in the area. These include building bulk, use and type; building arrangement; block form and street pattern; streetscape elements; street hierarchy; and natural features. An area's visual resources are its unique or important public view corridors, vistas, or natural or built features. For CEQR analysis purposes, this includes only views from public and publicly accessible locations and does not include private residences or places of business.

It is not possible to evaluate the impacts of any specific development, as the specific location of future development projects is unknown. Therefore, the urban design and visual resources assessment in the DEIS will be based on prototypical scenarios.

VIII. Natural resources

Per CEQR, a natural resource is defined as (1) the City's biodiversity (plants, wildlife, and other organisms); (2) any aquatic or terrestrial areas capable of providing suitable habitat to sustain the life processes of plants, wildlife, and other organisms; and (3) any areas capable of functioning in support of the ecological systems that maintain the City's environmental stability. Such resources include ground water, soils, and geologic features, wetlands, dunes, beaches, grasslands, woodlands, landscaped areas, gardens, parks, and any areas used by wildlife may be considered. According to the *CEQR Technical Manual*, an assessment of natural resources is appropriate if a natural resource exists on or near the site of the Proposed Action, or if an action involves disturbance of that resource.

An assessment of any potential impacts on natural resources due to the Proposed Action will be explored in the DEIS. Since specific site specific impacts are impossible to predict, a prototypical analysis will be conducted.

IX. Hazardous materials

A hazardous materials assessment determines whether a Proposed Action may increase the exposure of people or the environment to hazardous materials, and, if so, whether this increased exposure would result in potential significant public health or environmental impacts. The potential for significant impacts related to hazardous materials can occur when: (a) elevated levels of hazardous materials exist on a site and the project would increase pathways to human or environmental exposures; (b) a project would introduce new activities or processes using hazardous materials and the risk of human or environmental exposure is increased; or (c) the project would introduce a population to potential human or environmental exposure from off-site sources.

The Proposed Action could affect the type of development on sites within Designated Areas in Manufacturing Districts currently suitable for self-storage, which could result in increased ground disturbance in areas where hazardous materials may be present. Accordingly, a preliminary assessment will be completed in the DEIS by means of a representative examples analysis to assess the Proposed Action's potential to result in significant adverse hazardous materials impacts. If warranted, a detailed analysis will be completed.

X. Water and sewer infrastructure

The *CEQR Technical Manual* requires an assessment of the potential effects of the Proposed Action on the City's water supply, wastewater treatment, and storm water management infrastructure in order to assure that these systems have adequate capacity to accommodate land use or density changes. According to the *CEQR Technical Manual*, only projects that increase density or change drainage conditions on a large site require such an analysis.

An assessment of the Proposed Action's potential impacts on water and sewer infrastructure will be conducted in the DEIS based on a prototypical analysis, due to the generic nature of the Proposed Action.

XI. Solid waste and sanitation services

This section examines the Proposed Action's effects on solid waste and sanitation services. According to the 2014 *CEQR Technical Manual*, a solid waste and sanitation services assessment is intended to determine whether a project has the potential to cause a substantial increase in solid waste production that may overburden available waste management capacity or otherwise be inconsistent with the city's Solid Waste Management Plan or with state policy related to the city's integrated solid waste management system.

The Proposed Action's potential impacts on solid waste and sanitation services will be assessed in the DEIS using a prototypical analysis, because it is not possible to evaluate the impacts of any specific development, considering that the specific location of future development projects is unknown.

XII. Energy

According to the *CEQR Technical Manual*, an EIS must include a discussion of the effects of the Proposed Action on the use and conservation of energy, if applicable and significant. In most cases, an action does not need a detailed energy assessment, but its operational energy is projected. A detailed energy assessment is limited to actions that may significantly affect the transmission or generation of energy. For other actions, in lieu of a detailed assessment, the estimated amount of energy that would be consumed annually as a result of the day-to-day operation of the buildings and uses resulting from an action is disclosed, as recommended in the *CEQR Technical Manual*.

The Proposed Action's potential impacts on energy will be assessed in the DEIS by means of a prototypical analysis, since this is a generic action the impacts of any specific development cannot be determined, as the specific location of future development projects is unknown.

XIII. Transportation

A. Traffic and parking

The objective of traffic and parking analyses is to determine whether a Proposed Action is expected to have significant impacts on street and roadway conditions or on parking resources. This includes the sufficiency of street and highway elements to adequately process the Proposed Action's expected traffic flow and operating condition changes, and the effect of the Proposed Action on parking resources in the area. According to the *CEQR Technical Manual*, a preliminary trip generation analysis for a project will generally be appropriate to determine the volume of vehicular trips expected during the peak hours. In most areas of the City, including the project area, if the Proposed Action is projected to result in fewer than 50 peak hour vehicular trip ends, traffic impacts would be unlikely, and therefore further traffic analysis would not be necessary.

An assessment of any potential impacts on traffic and parking due to the Proposed Action will be explored in the DEIS by means of a prototypical analysis. The prototypical analysis is necessary because the specific location of future development projects is unknown, and the Proposed Action is a generic action.

B. Transit and Pedestrians

The objective of transit and pedestrian analyses is to determine whether a Proposed Action would have a significant impact on public transit facilities and services and on pedestrian flows. According to the general thresholds used by the Metropolitan Transportation Authority and specified in the *CEQR Technical Manual*, if a proposed development would result in pedestrian elements with 200 or more pedestrian trips, 50 or more bus trips in a single direction on a single route, or 200 or more passengers at a subway station or on a subway line during any analysis peak hour, further detailed analysis may be needed for a particular technical area.

The Proposed Action's potential impacts on transit and pedestrians will be assessed in the DEIS. While site specific impacts are impossible to predict, prototypes will be developed and utilized.

XIV. Air quality

Ambient air quality, or the quality of the surrounding air, may be affected by air pollutants produced by motor vehicles, referred to as "mobile sources;" by fixed facilities, usually referenced as "stationary sources;" or by a combination of both. Under CEQR, an air quality analysis determines whether a Proposed Action would result in stationary or mobile sources of pollutant emissions that could have a significant adverse impact on ambient air quality, and also considers the potential of existing sources of air pollution to impact the proposed uses.

An assessment of any potential impacts on air quality due to the Proposed Action will be explored in the DEIS using a prototypical analysis, because it is not possible to evaluate the impacts of any specific development, considering that the specific location of future development projects is unknown.

XV. Greenhouse gas emissions and climate change

As noted in the *CEQR Technical Manual*, increased concentrations of greenhouse gases (GHGs) are changing the global climate, resulting in wide-ranging effects on the environment, including rising sea levels, increases in temperature, and changes in precipitation levels. Although this is occurring on a global scale, the environmental effects of climate change are also likely to be felt at the local level. Through *PlaNYC*, New York City's long-term sustainability program, the City advances sustainability initiatives and goals to both greatly reduce GHG emissions and increase the City's resilience to climate change. The New York City Climate Protection Act, enacted as Local Law 22 of 2008, established the goal to reduce citywide GHG emissions to 30 percent below 2005 levels by 2030 (the "GHG reduction goal"). This goal was developed for the purpose of planning for an increase in population of almost one million residents while achieving significant greenhouse gas reductions.

An assessment of any potential impacts on greenhouse gas emissions and climate change due to the Proposed Action will be explored in the DEIS by means of a prototypical analysis, because it is not possible to evaluate the impacts of any specific development, considering that the specific location of future development projects is unknown.

XVI. Noise

The *CEQR Technical Manual* requires an assessment of the Proposed Action's potential effects on sensitive noise receptors (including residences, health care facilities, schools, open space, etc.) and the potential noise exposure at any new sensitive receptors introduced by the Proposed Action.

Based on the projected likely effects of the Proposed Action, a noise assessment will be prepared in the DEIS in accordance with the *CEQR Technical Manual* and using a prototypical analysis, considering that the specific location of future development projects is not known.

XVII. Public health

With respect to Public Health, the *CEQR Technical Manual* states its goal to be, "to determine whether adverse impacts on public health may occur as a result of a proposed project, and if so, to identify measures to mitigate such effects."

According to the *CEQR Technical Manual*, for most proposed projects, a public health analysis is not necessary. Where no significant unmitigated adverse impact is found in other CEQR analysis areas, such as air quality, water quality, hazardous materials, or noise, no public health analysis is warranted. If, however,

an unmitigated significant adverse impact is identified in one of these analysis areas, the lead agency may determine that a public health assessment is warranted for that specific technical area.

Although an impact on public health is not expected, an assessment of the Proposed Action's potential for impacts will be conducted in the DEIS using a prototypical analysis. While site specific impacts are impossible to predict, prototypes will be developed and utilized.

XVIII. Neighborhood character

The *CEQR Technical Manual*, defines neighborhood character as an amalgam of the various elements that give neighborhoods their distinct personality. These elements can include land use, socioeconomic conditions, open space, historic and cultural resources, urban design and visual resources, shadows, transportation and noise, but not all of these elements contribute to neighborhood character in all cases. For neighborhood character, CEQR considers how those elements combine to create the context and feeling of a neighborhood, and how an action would affect that context.

According to the *CEQR Technical Manual*, an assessment of neighborhood character may be appropriate if the Proposed Action impacts any of those individual elements within a neighborhood. It is also possible that several moderate changes in the elements that contribute to a neighborhood's character could lead to a significant impact on neighborhood character. Generally, neighborhood character impacts are rare, and it would be unusual that, in the absence of a significant adverse impact in any of the relevant technical areas, a combination of moderate effects to the neighborhood would result in an impact to neighborhood character. Moreover, a significant impact identified in one of the technical areas that contribute to a neighborhood's character is not automatically equivalent to a significant impact on neighborhood character, but rather serves as an indication that neighborhood character should be examined.

An assessment of the Proposed Action's potential impacts on neighborhood character will be conducted in the DEIS. While site specific impacts are impossible to predict, prototypes will be developed and utilized.

XIX. Construction

Construction impacts, though temporary, can have a disruptive and noticeable effect on the adjacent community, as well as people passing through the area. Construction impacts are usually important when construction activity has the potential to affect transportation conditions, archaeological resources and the integrity of historic resources, community noise patterns, air quality conditions, and mitigation of hazardous materials.

An assessment of any potential impacts on construction due to the Proposed Action will be explored in the DEIS and will be based on a prototypical analysis, considering that the specific location of future development projects is not known.

APPENDIX A - REFERENCES

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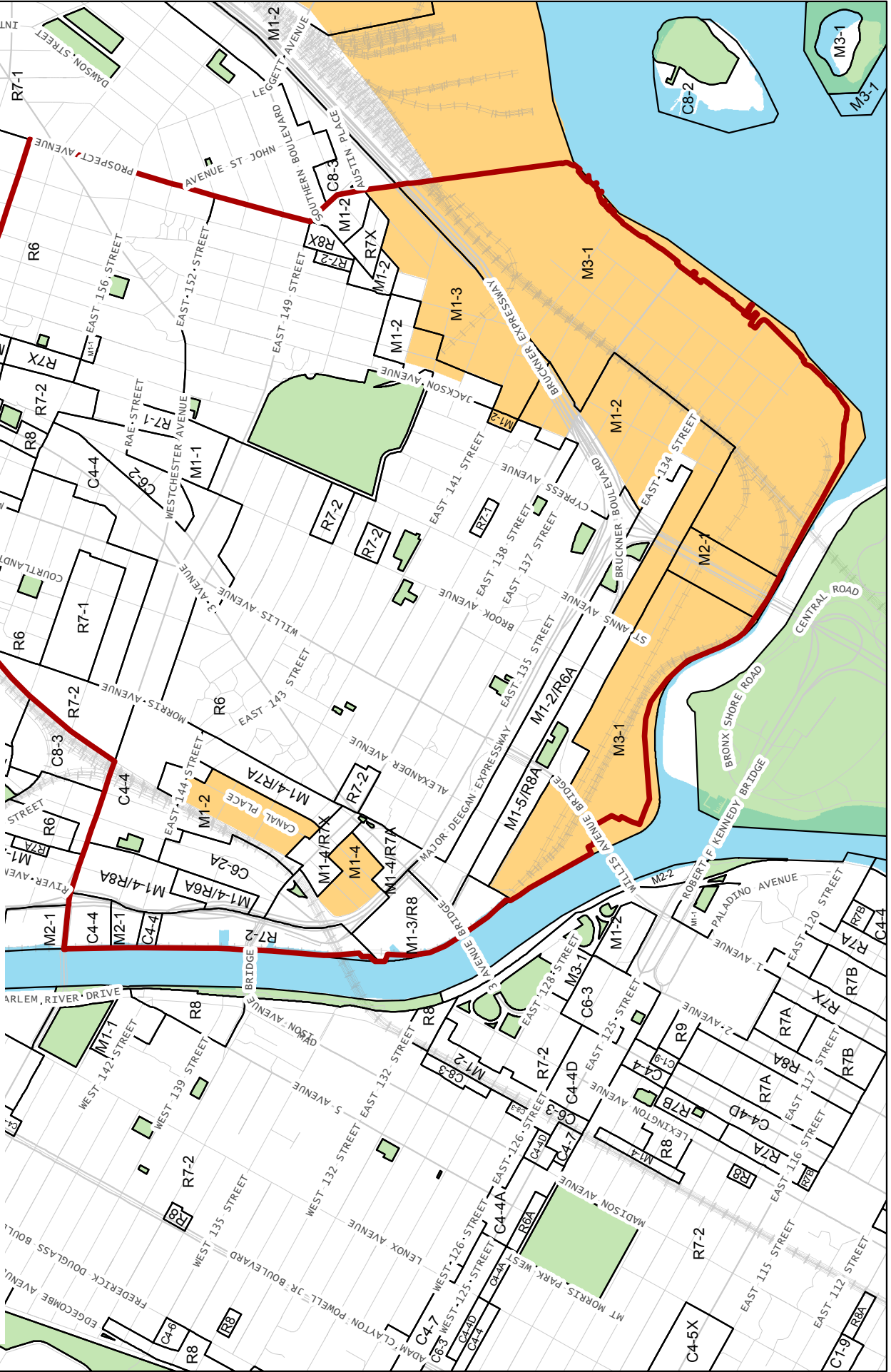
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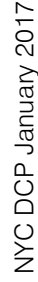
APPENDIX B – DESIGNATED AREAS IN M DISTRICT MAPS

BRONX: CD 1

Proposed Designated Areas in M Districts
where CPC Special Permit for self-storage would apply



where CPC Special Permit for self-storage would apply



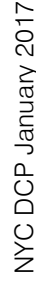
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BRONX: CD 3

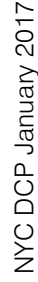
Proposed Designated Areas in M Districts where CPC Special Permit for self-storage would apply

This map shows the proposed designated areas in M Districts for self-storage permits in the Bronx, CD 3. The map includes various streets and district boundaries. The designated areas are highlighted in orange and yellow. The map also shows the locations of various M Districts, including M1-1, M1-2, M1-3, M1-4, M1-5, M1-6, M1-7, M1-8, M1-9, M1-10, M1-11, M1-12, M1-13, M1-14, M1-15, M1-16, M1-17, M1-18, M1-19, M1-20, M1-21, M1-22, M1-23, M1-24, M1-25, M1-26, M1-27, M1-28, M1-29, M1-30, M1-31, M1-32, M1-33, M1-34, M1-35, M1-36, M1-37, M1-38, M1-39, M1-40, M1-41, M1-42, M1-43, M1-44, M1-45, M1-46, M1-47, M1-48, M1-49, M1-50, M1-51, M1-52, M1-53, M1-54, M1-55, M1-56, M1-57, M1-58, M1-59, M1-60, M1-61, M1-62, M1-63, M1-64, M1-65, M1-66, M1-67, M1-68, M1-69, M1-70, M1-71, M1-72, M1-73, M1-74, M1-75, M1-76, M1-77, M1-78, M1-79, M1-80, M1-81, M1-82, M1-83, M1-84, M1-85, M1-86, M1-87, M1-88, M1-89, M1-90, M1-91, M1-92, M1-93, M1-94, M1-95, M1-96, M1-97, M1-98, M1-99, M1-100, M1-101, M1-102, M1-103, M1-104, M1-105, M1-106, M1-107, M1-108, M1-109, M1-110, M1-111, M1-112, M1-113, M1-114, M1-115, M1-116, M1-117, M1-118, M1-119, M1-120, M1-121, M1-122, M1-123, M1-124, M1-125, M1-126, M1-127, M1-128, M1-129, M1-130, M1-131, M1-132, M1-133, M1-134, M1-135, M1-136, M1-137, M1-138, M1-139, M1-140, M1-141, M1-142, M1-143, M1-144, M1-145, M1-146, M1-147, M1-148, M1-149, M1-150, M1-151, M1-152, M1-153, M1-154, M1-155, M1-156, M1-157, M1-158, M1-159, M1-160, M1-161, M1-162, M1-163, M1-164, M1-165, M1-166, M1-167, M1-168, M1-169, M1-170, M1-171, M1-172, M1-173, M1-174, M1-175, M1-176, M1-177, M1-178, M1-179, M1-180, M1-181, M1-182, M1-183, M1-184, M1-185, M1-186, M1-187, M1-188, M1-189, M1-190, M1-191, M1-192, M1-193, M1-194, M1-195, M1-196, M1-197, M1-198, M1-199, M1-200, M1-201, M1-202, M1-203, M1-204, M1-205, M1-206, M1-207, M1-208, M1-209, M1-210, M1-211, M1-212, M1-213, M1-214, M1-215, M1-216, M1-217, M1-218, M1-219, M1-220, M1-221, M1-222, M1-223, M1-224, M1-225, M1-226, M1-227, M1-228, M1-229, M1-230, M1-231, M1-232, M1-233, M1-234, M1-235, M1-236, M1-237, M1-238, M1-239, M1-240, M1-241, M1-242, M1-243, M1-244, M1-245, M1-246, M1-247, M1-248, M1-249, M1-250, M1-251, M1-252, M1-253, M1-254, M1-255, M1-256, M1-257, M1-258, M1-259, M1-260, M1-261, M1-262, M1-263, M1-264, M1-265, M1-266, M1-267, M1-268, M1-269, M1-270, M1-271, M1-272, M1-273, M1-274, M1-275, M1-276, M1-277, M1-278, M1-279, M1-280, M1-281, M1-282, M1-283, M1-284, M1-285, M1-286, M1-287, M1-288, M1-289, M1-290, M1-291, M1-292, M1-293, M1-294, M1-295, M1-296, M1-297, M1-298, M1-299, M1-300, M1-301, M1-302, M1-303, M1-304, M1-305, M1-306, M1-307, M1-308, M1-309, M1-310, M1-311, M1-312, M1-313, M1-314, M1-315, M1-316, M1-317, M1-318, M1-319, M1-320, M1-321, M1-322, M1-323, M1-324, M1-325, M1-326, M1-327, M1-328, M1-329, M1-330, M1-331, M1-332, M1-333, M1-334, M1-335, M1-336, M1-337, M1-338, M1-339, M1-340, M1-341, M1-342, M1-343, M1-344, M1-345, M1-346, M1-347, M1-348, M1-349, M1-350, M1-351, M1-352, M1-353, M1-354, M1-355, M1-356, M1-357, M1-358, M1-359, M1-360, M1-361, M1-362, M1-363, M1-364, M1-365, M1-366, M1-367, M1-368, M1-369, M1-370, M1-371, M1-372, M1-373, M1-374, M1-375, M1-376, M1-377, M1-378, M1-379, M1-380, M1-381, M1-382, M1-383, M1-384, M1-385, M1-386, M1-387, M1-388, M1-389, M1-390, M1-391, M1-392, M1-393, M1-394, M1-395, M1-396, M1-397, M1-398, M1-399, M1-400, M1-401, M1-402, M1-403, M1-404, M1-405, M1-406, M1-407, M1-408, M1-409, M1-410, M1-411, M1-412, M1-413, M1-414, M1-415, M1-416, M1-417, M1-418, M1-419, M1-420, M1-421, M1-422, M1-423, M1-424, M1-425, M1-426, M1-427, M1-428, M1-429, M1-430, M1-431, M1-432, M1-433, M1-434, M1-435, M1-436, M1-437, M1-438, M1-439, M1-440, M1-441, M1-442, M1-443, M1-444, M1-445, M1-446, M1-447, M1-448, M1-449, M1-450, M1-451, M1-452, M1-453, M1-454, M1-455, M1-456, M1-457, M1-458, M1-459, M1-460, M1-461, M1-462, M1-463, M1-464, M1-465, M1-466, M1-467, M1-468, M1-469, M1-470, M1-471, M1-472, M1-473, M1-474, M1-475, M1-476, M1-477, M1-478, M1-479, M1-480, M1-481, M1-482, M1-483, M1-484, M1-485, M1-486, M1-487, M1-488, M1-489, M1-490, M1-491, M1-492, M1-493, M1-494, M1-495, M1-496, M1-497, M1-498, M1-499, M1-500, M1-501, M1-502, M1-503, M1-504, M1-505, M1-506, M1-507, M1-508, M1-509, M1-510, M1-511, M1-512, M1-513, M1-514, M1-515, M1-516, M1-517, M1-518, M1-519, M1-520, M1-521, M1-522, M1-523, M1-524, M1-525, M1-526, M1-527, M1-528, M1-529, M1-530, M1-531, M1-532, M1-533, M1-534, M1-535, M1-536, M1-537, M1-538, M1-539, M1-540, M1-541, M1-542, M1-543, M1-544, M1-545, M1-546, M1-547, M1-548, M1-549, M1-550, M1-551, M1-552, M1-553, M1-554, M1-555, M1-556, M1-557, M1-558, M1-559, M1-560, M1-561, M1-562, M1-563, M1-564, M1-565, M1-566, M1-567, M1-568, M1-569, M1-570, M1-571, M1-572, M1-573, M1-574, M1-575, M1-576, M1-577, M1-578, M1-579, M1-580, M1-581, M1-582, M1-583

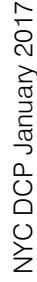
where CPC Special Permit for self-storage would apply



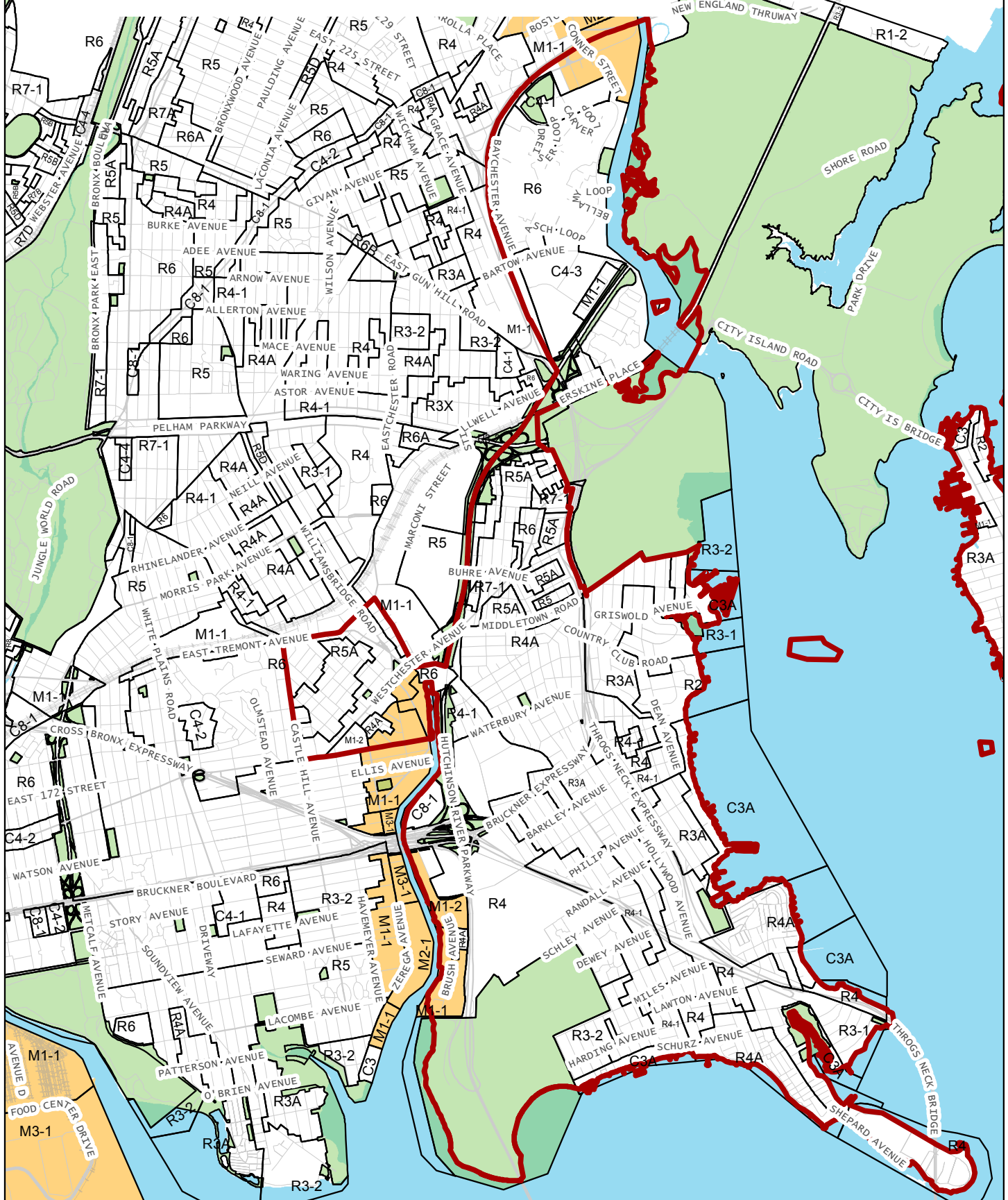
Proposed Designated Areas in M Districts
where CPC Special Permit for self-storage would apply



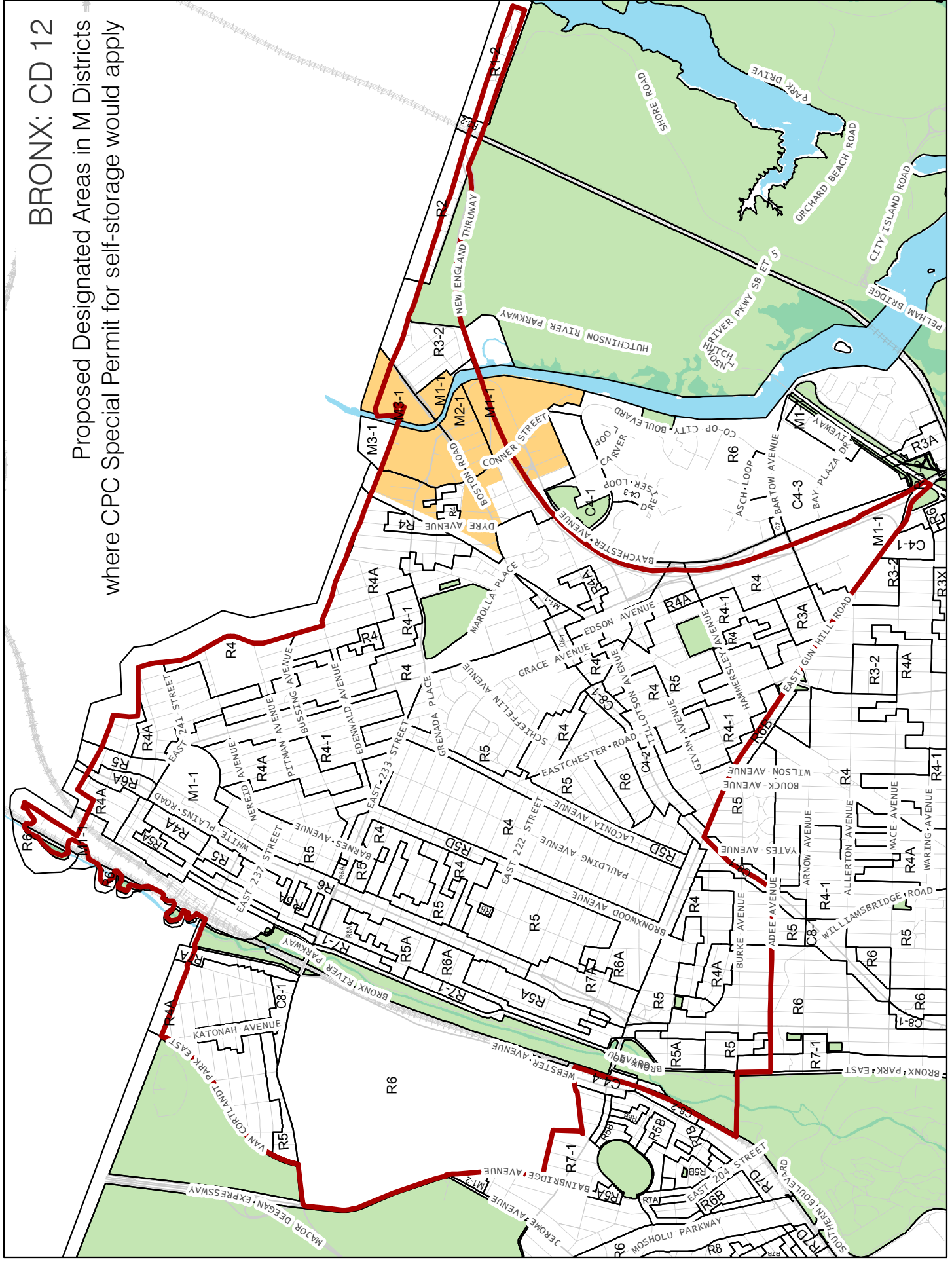
where CPC Special Permit for self-storage would apply



Proposed Designated Areas in M Districts
where CPC Special Permit for self-storage would apply



Proposed Designated Areas in M Districts
where CPC Special Permit for self-storage would apply

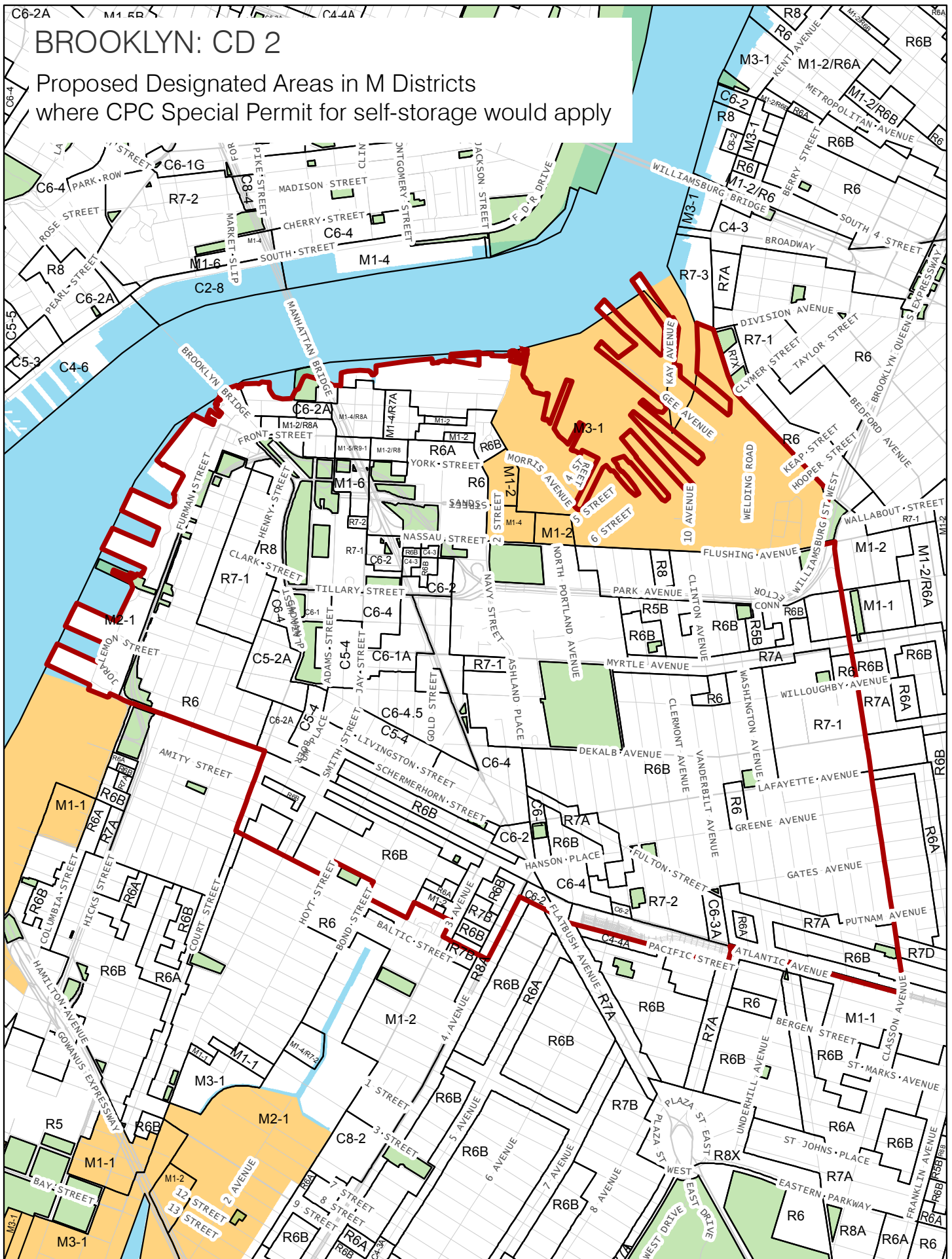


Proposed Designated Areas in M Districts where CPC Special Permit for self-storage would apply



BROOKLYN: CD 2

Proposed Designated Areas in M Districts
where CPC Special Permit for self-storage would apply



BROOKLYN: CD 4

Proposed Designated Areas in M Districts
where CPC Special Permit for self-storage would apply

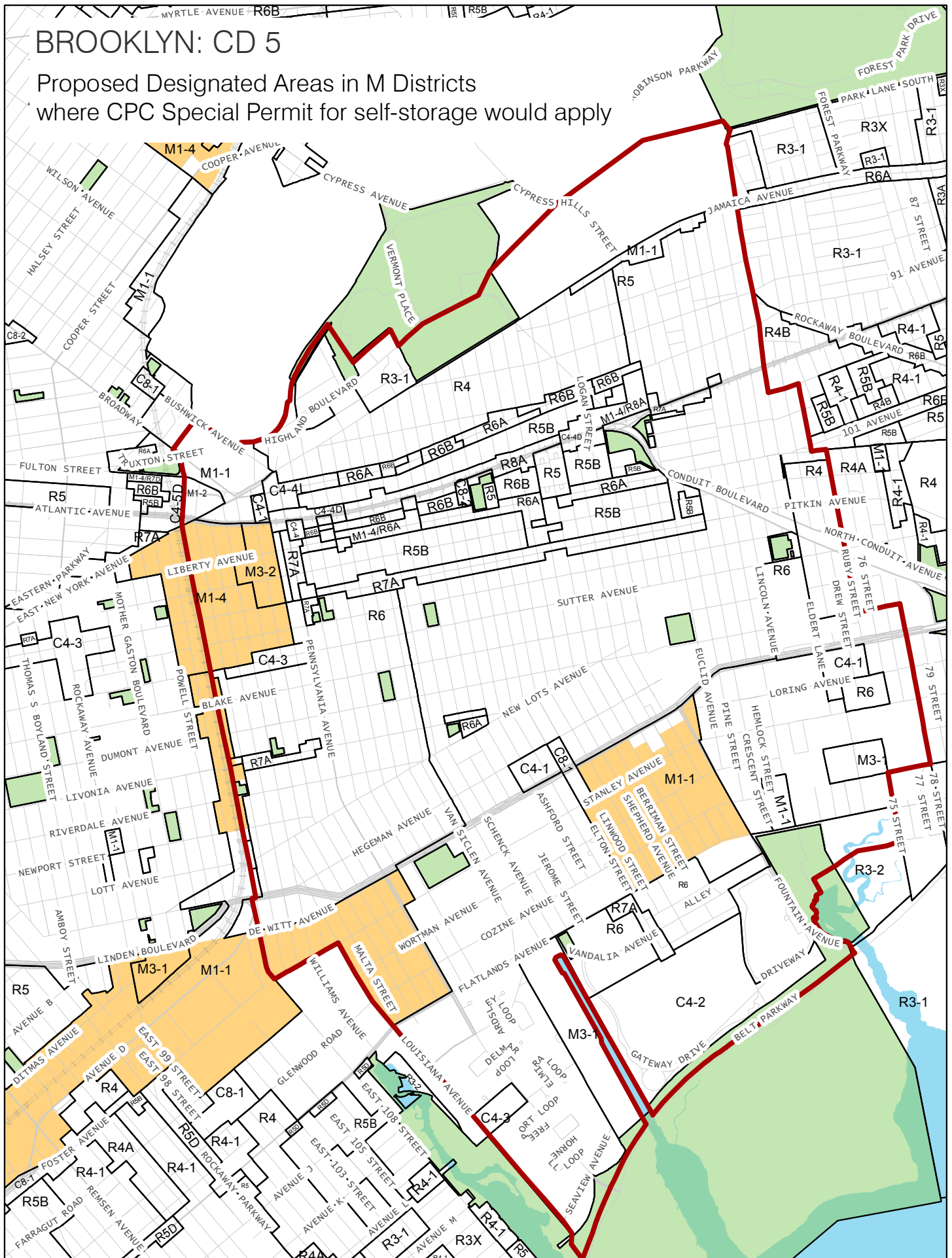
BROOKLYN: CD 4

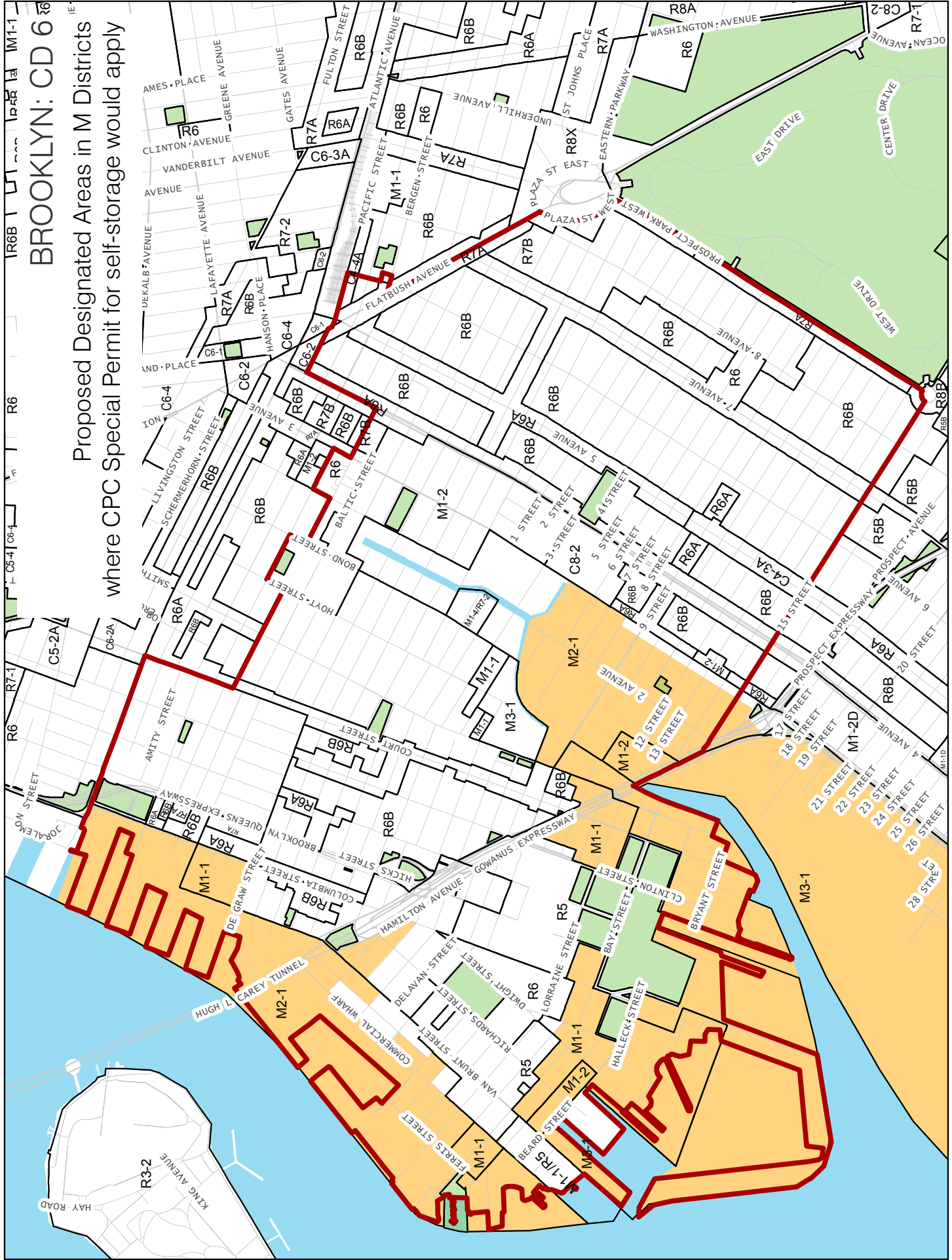
Proposed Designated Areas in M Districts
where CPC Special Permit for self-storage would apply

This map displays the proposed designated areas in M Districts for Brooklyn, CD 4, where a CPC Special Permit for self-storage would apply. The map shows various streets and district boundaries. Key streets include Grand Street, Meadow Street, Stag Street, Meserole Street, Randolph Street, Varick Avenue, Morgan Avenue, Johnson Avenue, Porter Avenue, Flushing Avenue, Central Avenue, Knickerbocker Avenue, DeKalb Avenue, St Nicholas Avenue, Wyckoff Avenue, Cypress Avenue, Myrtle Avenue, Seneca Avenue, Forest Avenue, Fresh Pond Road, R6B Metropolitan Avenue, R4-1, R4B, R4, R5B, R6B, R7A, R7B, R7C, R7D, R7E, R7F, R7G, R7H, R7I, R7J, R7K, R7L, R7M, R7N, R7O, R7P, R7Q, R7R, R7S, R7T, R7U, R7V, R7W, R7X, R7Y, R7Z, R8A, R8B, R8C, R8D, R8E, R8F, R8G, R8H, R8I, R8J, R8K, R8L, R8M, R8N, R8O, R8P, R8Q, R8R, R8S, R8T, R8U, R8V, R8W, R8X, R8Y, R8Z, R9A, R9B, R9C, R9D, R9E, R9F, R9G, R9H, R9I, R9J, R9K, R9L, R9M, R9N, R9O, R9P, R9Q, R9R, R9S, R9T, R9U, R9V, R9W, R9X, R9Y, R9Z, R10A, R10B, R10C, R10D, R10E, R10F, R10G, R10H, R10I, R10J, R10K, R10L, R10M, R10N, R10O, R10P, R10Q, R10R, R10S, R10T, R10U, R10V, R10W, R10X, R10Y, R10Z, R11A, R11B, R11C, R11D, R11E, R11F, R11G, R11H, R11I, R11J, 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BROOKLYN: CD 5

Proposed Designated Areas in M Districts
where CPC Special Permit for self-storage would apply



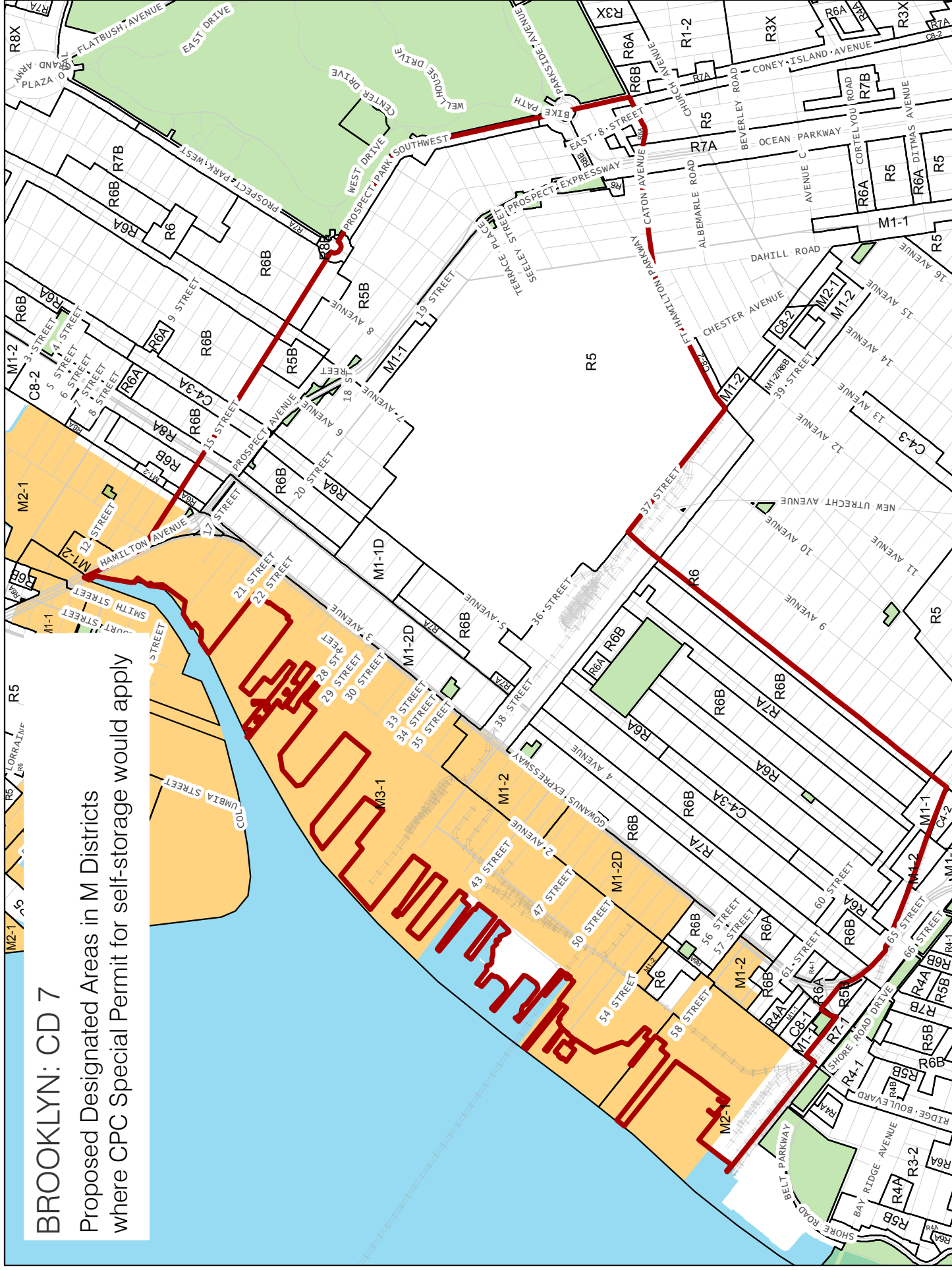


BROOKLYN: CD 6

Proposed Designated Areas in M Districts
where CPC Special Permit for self-storage would apply

BROOKLYN: CD 7

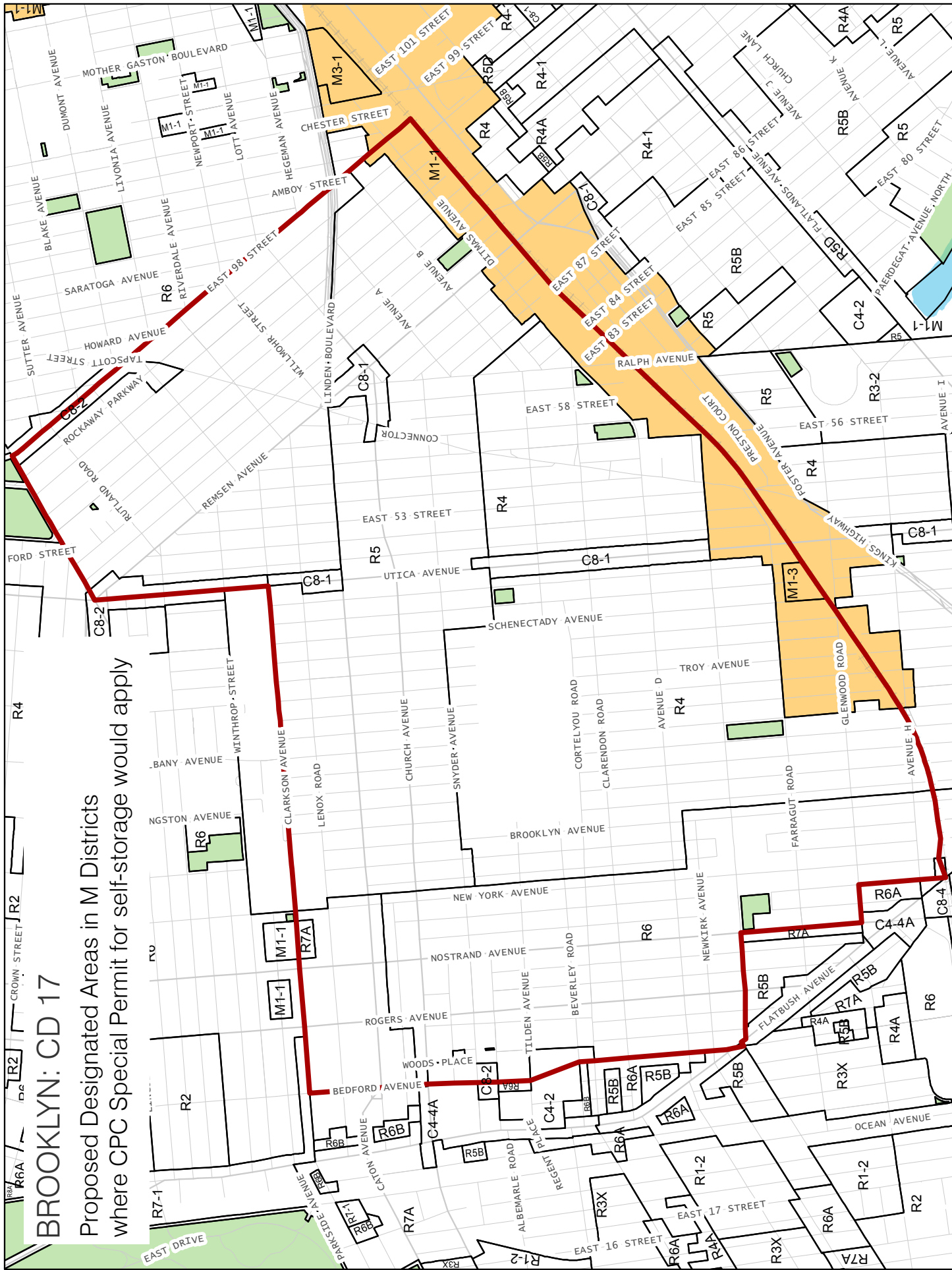
Proposed Designated Areas in M Districts
where CPC Special Permit for self-storage would apply



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BROOKLYN: CD 17

Proposed Designated Areas in M Districts
where CPC Special Permit for self-storage would apply



BROOKLYN: CD 18

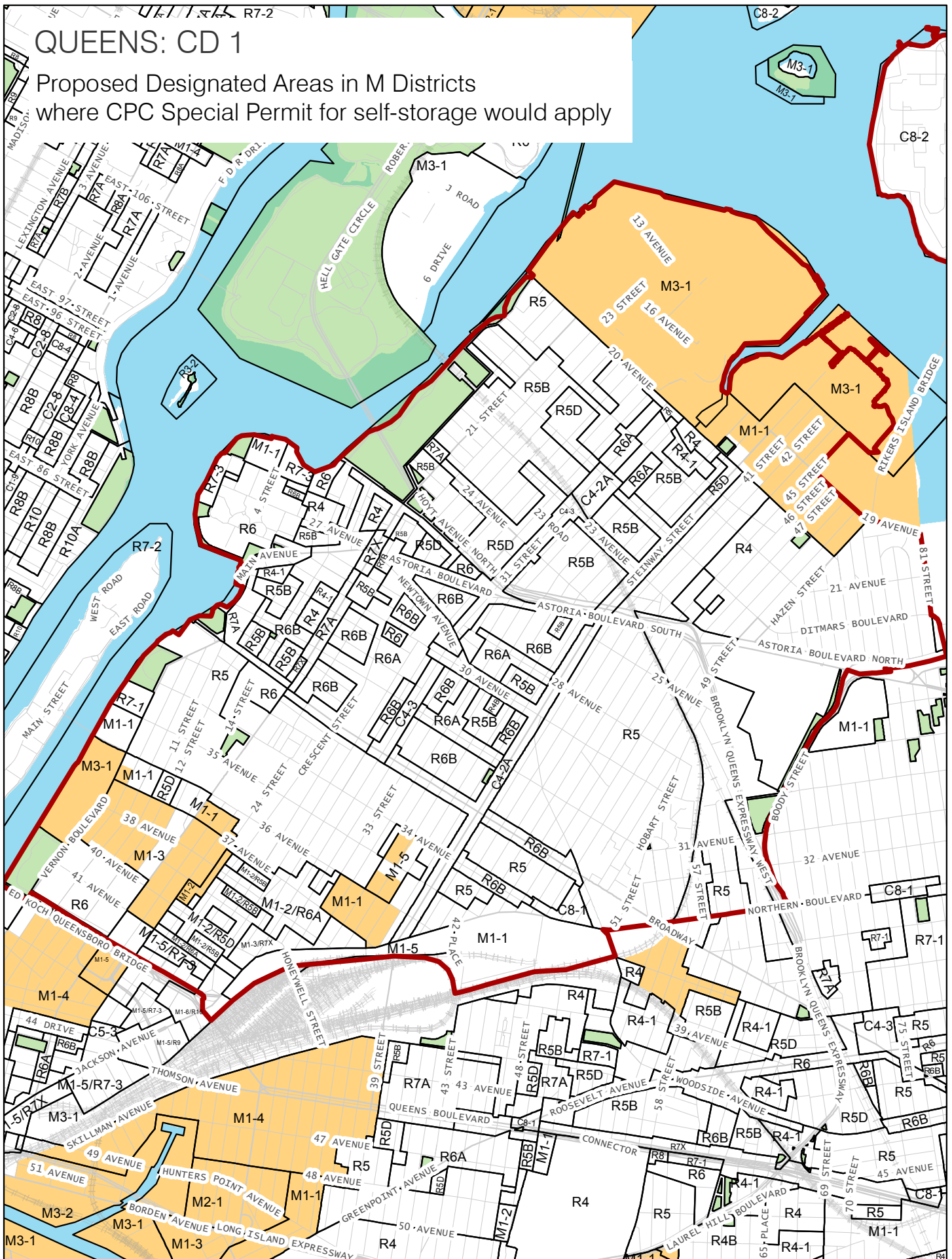
Proposed Designated Areas in M Districts
where CPC Special Permit for self-storage would apply

BROOKLYN: CD 18

Proposed Designated Areas in M Districts
where CPC Special Permit for self-storage would apply

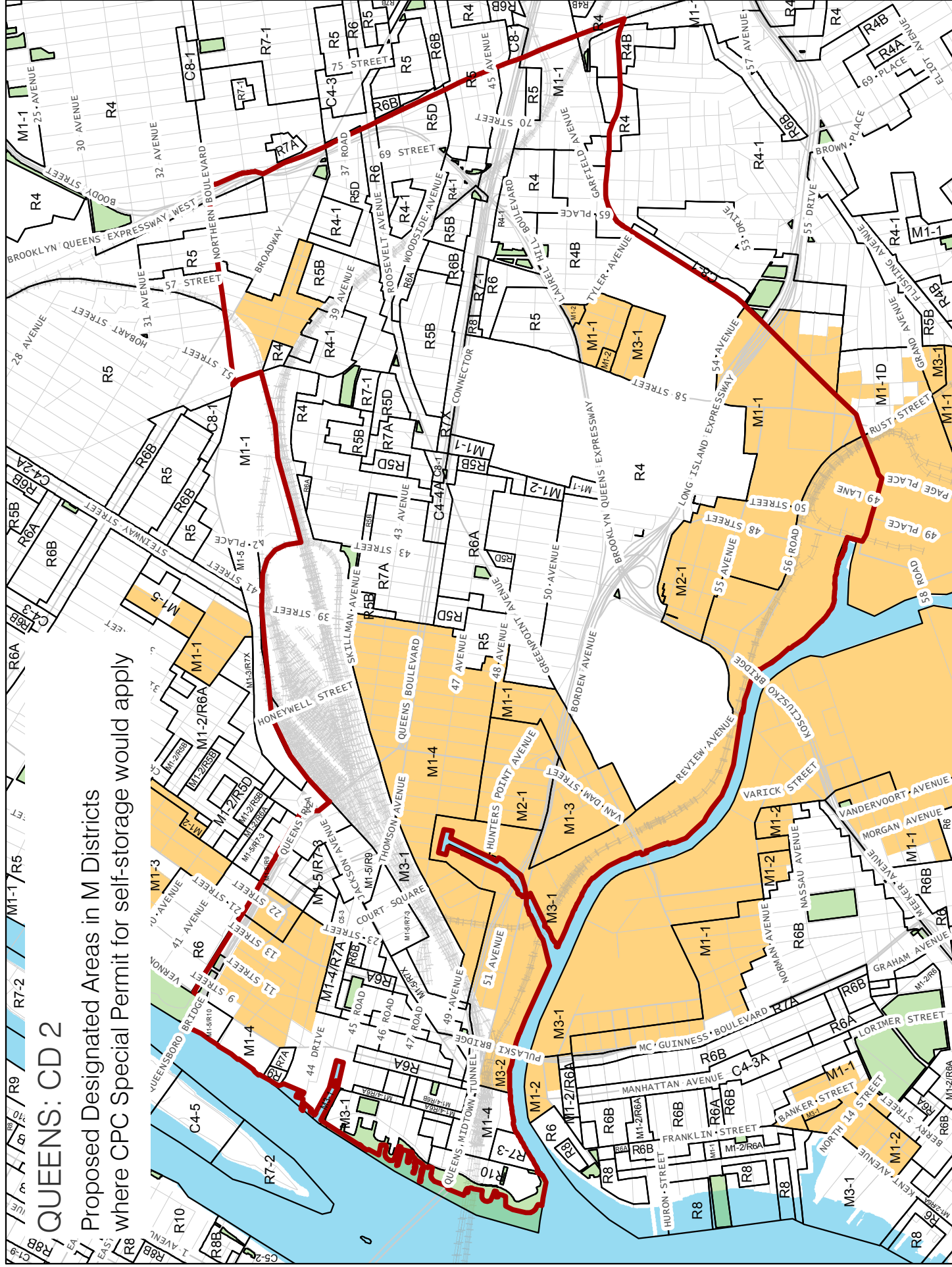
QUEENS: CD 1

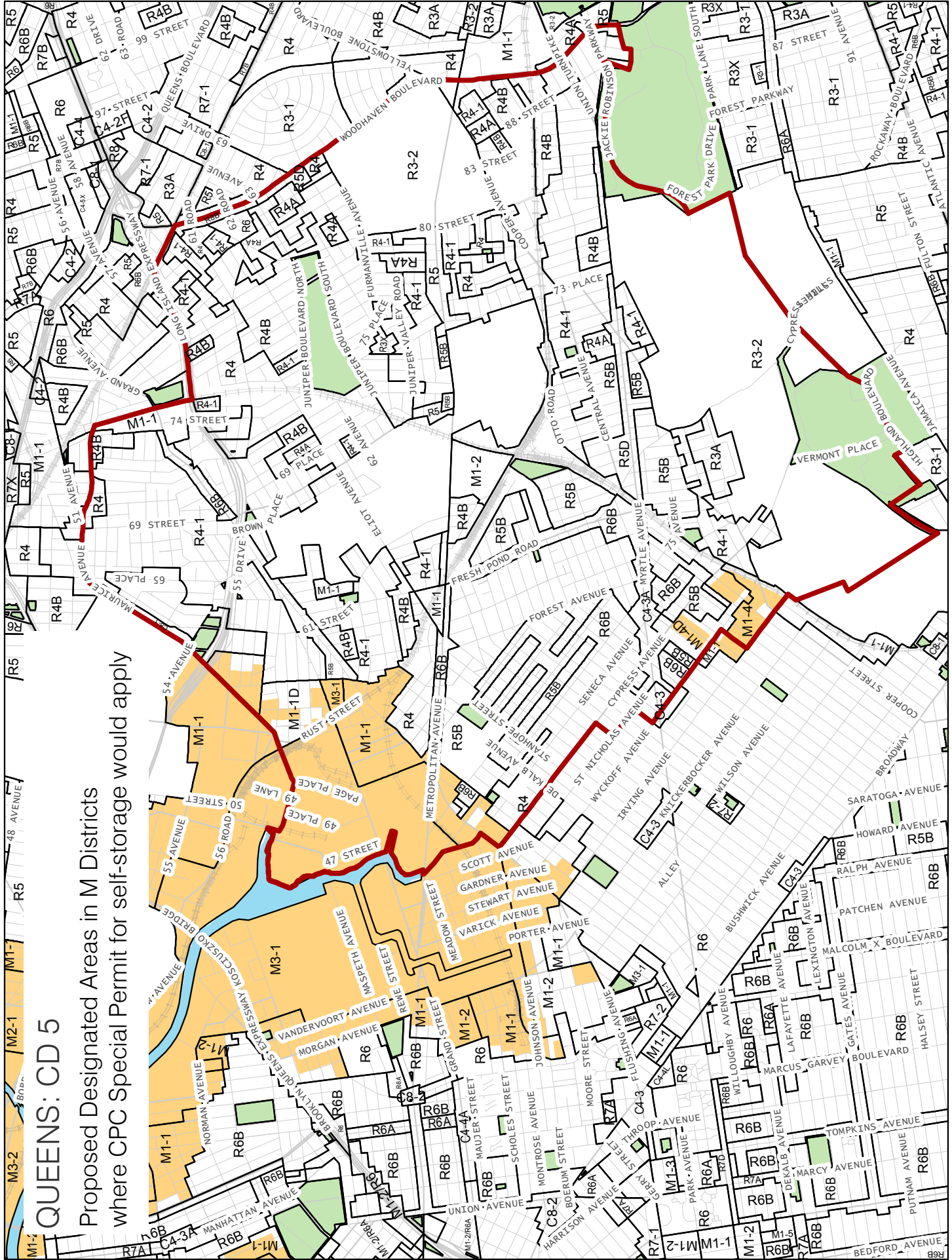
Proposed Designated Areas in M Districts
where CPC Special Permit for self-storage would apply



QUEENS: CD 2

Proposed Designated Areas in M Districts where CPC Special Permit for self-storage would apply





QUEENS: CD 5

Proposed Designated Areas in M Districts where CPC Special Permit for self-storage would apply

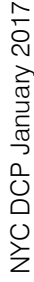
Proposed Designated Areas in M Districts

QUEENS: CD 10

Proposed Designated Areas in M Districts
where CPC Special Permit for self-storage would apply

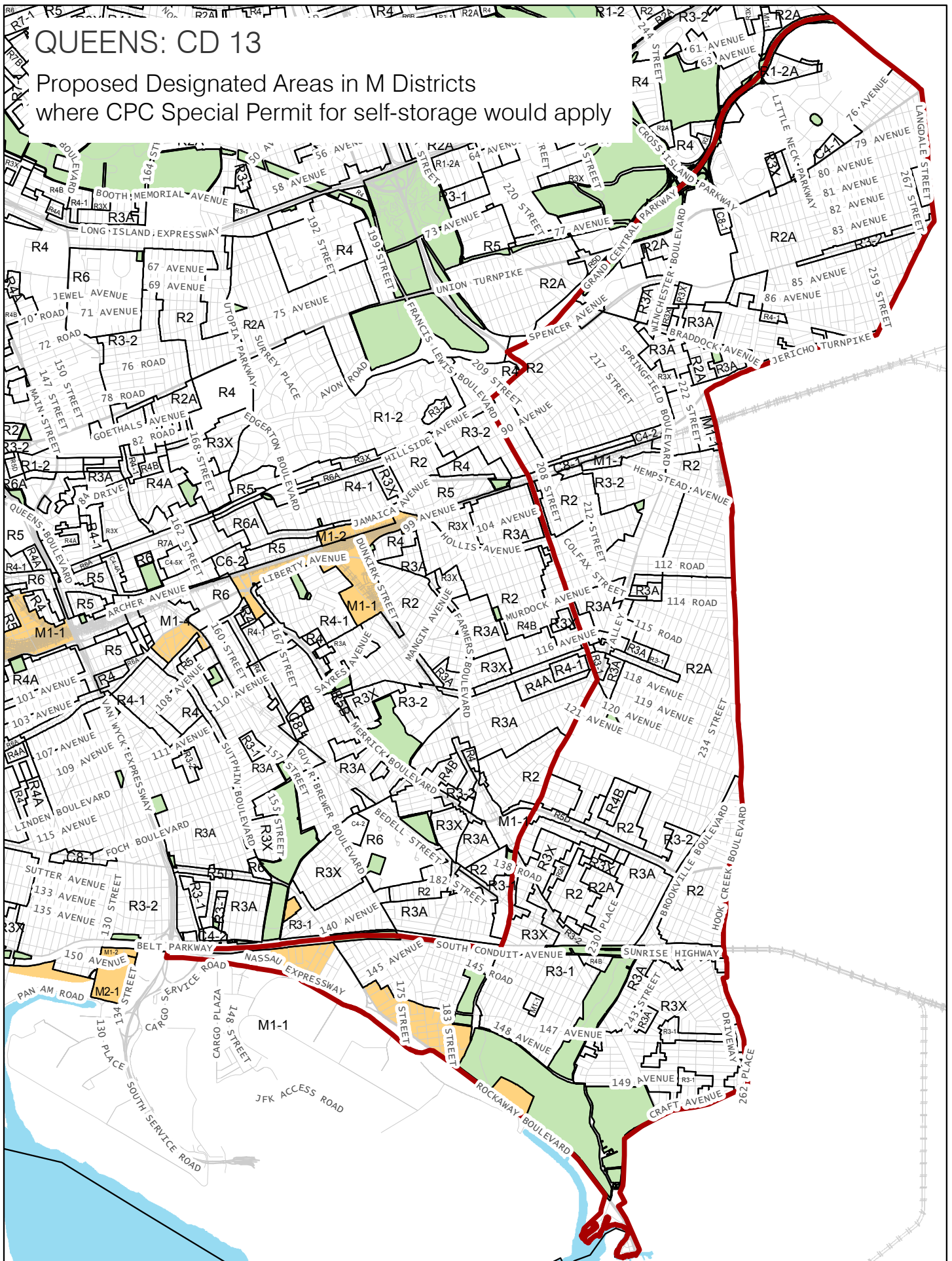


where CPC Special Permit for self-storage would apply

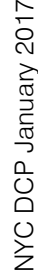


QUEENS: CD 13

Proposed Designated Areas in M Districts
where CPC Special Permit for self-storage would apply

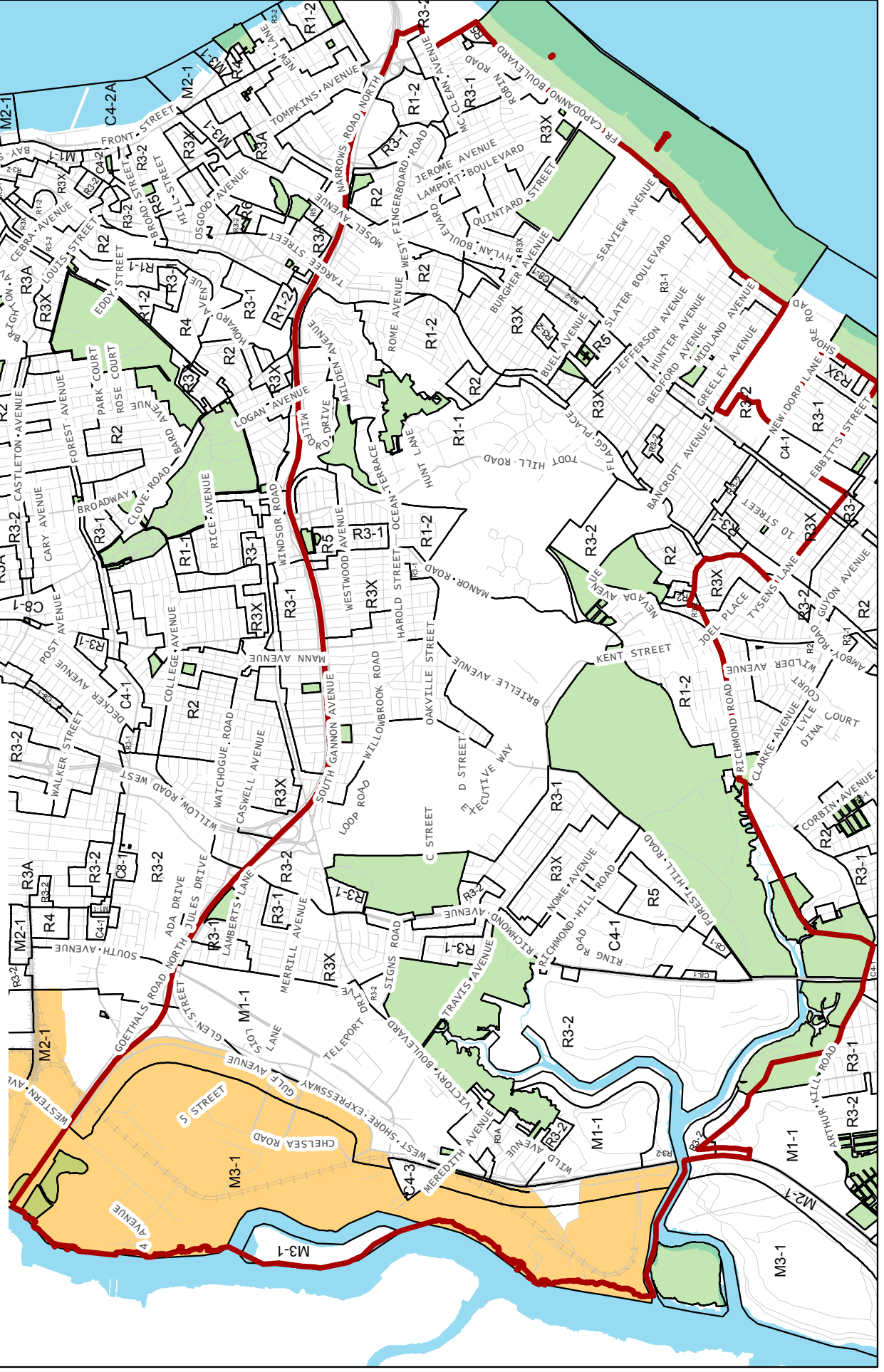


Proposed Designated Areas in M Districts
where CPC Special Permit for self-storage would apply



STATEN ISLAND: CD 2

Proposed Designated Areas in M Districts
where CPC Special Permit for self-storage would apply



Proposed Designated Areas in M Districts

1-1

