

Self-storage Text Amendment
Draft Scope of Work
for an Environmental Impact Statement
CEQR No. 17DCP119Y
ULURP Nos. Pending
March 1, 2017

I. INTRODUCTION

This Draft Scope of Work (Draft Scope) outlines the technical areas to be analyzed in the preparation of the Draft Environmental Impact Statement (DEIS) for the ***Self-storage Text Amendment*** (“Proposed Action”), which would implement a key policy goal established in Mayor Bill de Blasio’s ***10-Point Industrial Action Plan***.

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 seen as 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 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.

The City Planning Commission (CPC) has determined that an EIS for the Proposed Action will be prepared in conformance with *City Environmental Quality Review (CEQR) Technical Manual* guidelines, with DCP acting on behalf of the CPC as the lead agency. The environmental analyses in the EIS will assume a development period of ten years for the reasonable worst-case development scenario (RWCDs) for the Proposed Action, as defined herein, (i.e., analysis year of 2027). DCP will conduct a coordinated review of the Proposed Action with involved and interested agencies.

II. REQUIRED APPROVALS AND REVIEW PROCEDURES

The proposed Zoning Text Amendment encompasses a discretionary action that is subject to review under Section 200 of the City Charter, and the City Environmental Quality review (CEQR) process.

The Proposed Action is classified as Type I, as defined under 6 NYCRR 617.4 and 43 RCNY 6-15, subject to environmental review in accordance with CEQR guidelines. An Environmental Assessment Statement (EAS) was completed on March 1, 2017. A Positive Declaration, issued on March 1, 2017, established that the Proposed Action may have a significant adverse impact on the environment, thus warranting the preparation of an EIS.

The CEQR scoping process is intended to focus the EIS on those issues that are most pertinent to the Proposed Action. The process allows other agencies and the public a voice in framing the scope of the EIS. The scoping document sets forth the analyses and methodologies that will be utilized to prepare the EIS. During the period for scoping, those interested in reviewing the Draft Scope may do so and give their comments to the lead agency. The public, interested agencies, Community Boards, and elected officials, are invited to comment on the draft scope of work, either in writing or orally, at a public scoping meeting to be held on March 30, 2017 at Spector Hall, 22 Reade Street, New York, New York 10007, starting at 10 AM. Comments received during the Draft Scope's public hearing and written comments received until 5:00 pm on April 10, 2017, will be considered and incorporated as appropriate into the Final Scope of Work (Final Scope). The lead agency will oversee preparation of the Final Scope, which will incorporate all relevant comments made on the Draft Scope, and revise the extent or methodologies of the studies, as appropriate, in response to comments made during scoping. The Draft EIS (DEIS) will be prepared in accordance with the Final Scope.

Once the lead agency is satisfied that the DEIS is complete, the document will be made available for public review and comment. A public hearing will be held on the DEIS in conjunction with the CPC hearing on the land use applications to afford all interested parties the opportunity to submit oral and written comments. The record will remain open for ten days after the public hearing to allow additional written comments on the DEIS. At the close of the public review period, a Final EIS (FEIS) will be prepared that will incorporate all substantive comments made on the DEIS, along with any revisions to the technical analysis necessary to respond to those comments. The FEIS will then be used by the decision makers to evaluate CEQR findings, which address project impacts and proposed mitigation measures, in deciding whether to approve the requested discretionary actions, with or without modifications.

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 (NYS DOL 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 1: 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 1 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 2). 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.

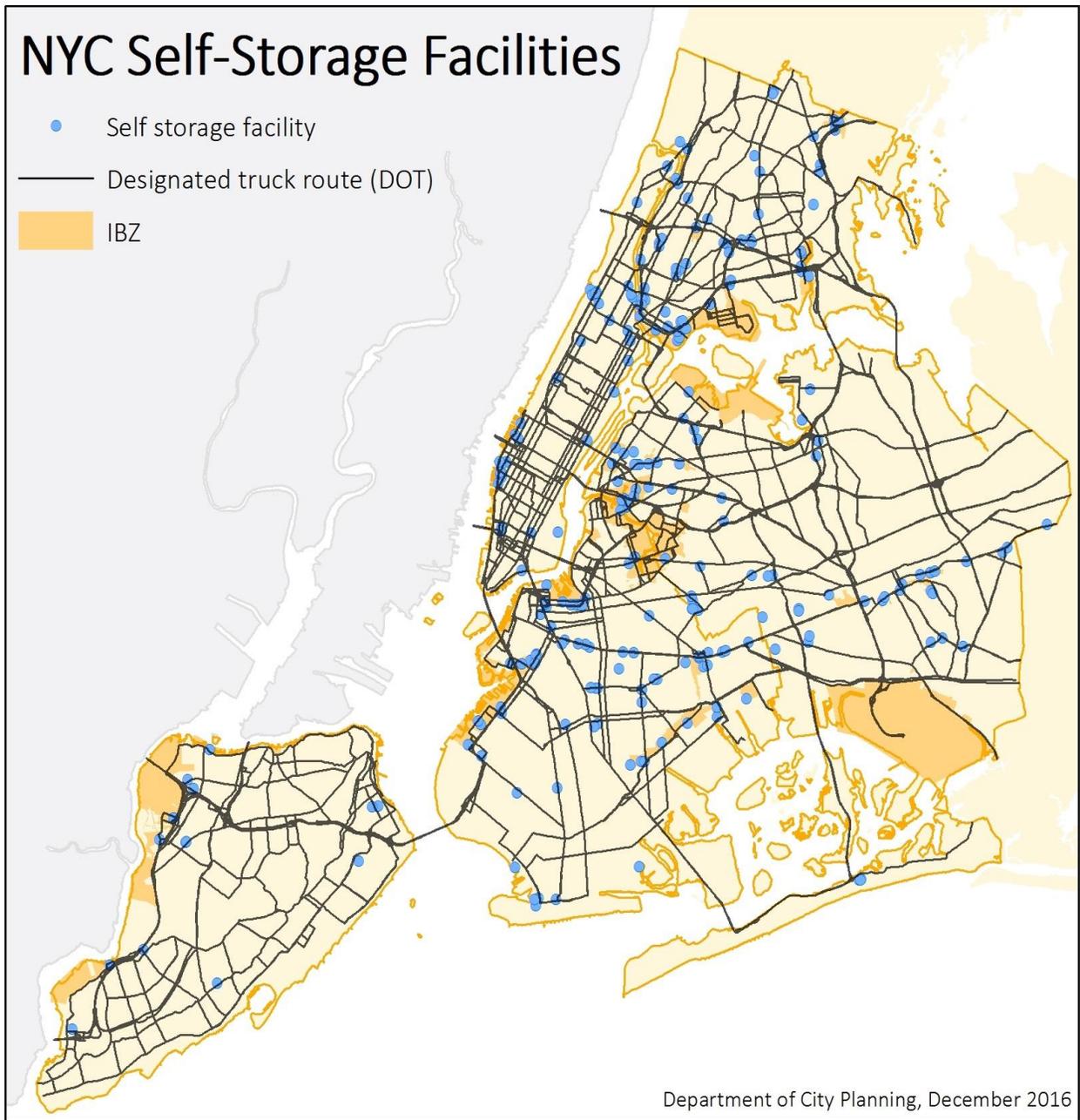


Figure 2: Locations of self-storage facilities and truck routes

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

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.

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 3: 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 4) 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 4: 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 5). 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 5: Example B
Source: Google Earth, 2017. Accessed January 18th 2017

V. 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. As discussed, the Proposed Action is analyzed in this environmental review as a "generic action." According to the *CEQR Technical Manual*, generic actions have wide application or affect the range of future alternative policies. Usually, these actions affect the entire city or an area so large that site-specific description or analysis is not appropriate. To analyze these potential environmental impacts of such types of actions, environmental reviews typically utilize a conceptual/ prototypical analysis.

The conceptual/prototypical analysis in this environmental review will review potential environmental impacts that could occur in the With-Action condition if self-storage facilities move from Designated Areas to M and C8 districts located outside Designated Areas. Although DCP 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, further dispersing them), prototypes will be developed to generically determine the potential environmental impacts of such movement. Prototypes will be developed based on existing trends and reasonable projections and will be representative of sites typical for recent self-storage development including: a small (15,000-30,000 sq. ft.), medium (30,000-60,000 sq. ft.) and large (greater than 60,000 sq. ft.) site, as well as a conversion of an existing multi-story building, located within Designated Areas in M Districts.

Additionally, to take into account any new development that may occur on parcels in Designated Areas in M Districts under the With-Action scenario, where self-storage facilities would have located under the No-Action Condition, representative examples will be developed. These representative examples will consider industrial development. Although the Proposed Action is not anticipated to induce industrial development (numerous factors influence the kind of uses that are developed in any given area, and industrial development is already permitted as-of-right in M districts), it is the most plausible use category. 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. Although the Proposed Action does not preclude other, non-industrial uses from occupying the sites where self-storage would not be developed, these other uses are relatively unlikely: they are less common in the proposed Designated Areas, since they tend to site in less actively industrial M districts, and do not usually utilize large lots along Designated Truck Routes. Accordingly, the representative examples analysis will focus on industrial uses, which is also more conservative for the purposes of environmental review.

These representative examples of industrial development will be analyzed to better understand any potential environmental impacts associated with the With-Action scenario. The type of industrial development that may be analyzed include: wholesale trade; construction; transportation and warehousing; manufacturing; repair and maintenance; telecommunications and motion picture and sound recording industries; waste management and remediation services; gasoline stations and motor vehicle and parts dealers; utilities. The exemplary businesses will be selected based upon recent industry trends within New York City.

A. 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 **Error! Reference source not found.**). 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 Action¹

	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 6: Zoning framework - Future with and without the Action |

¹ 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 7, and represented by the maps in , 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 facilities²

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 7: Directly Affected Areas

² 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.

Proposed Designated Areas in M Districts and Community District Boundaries

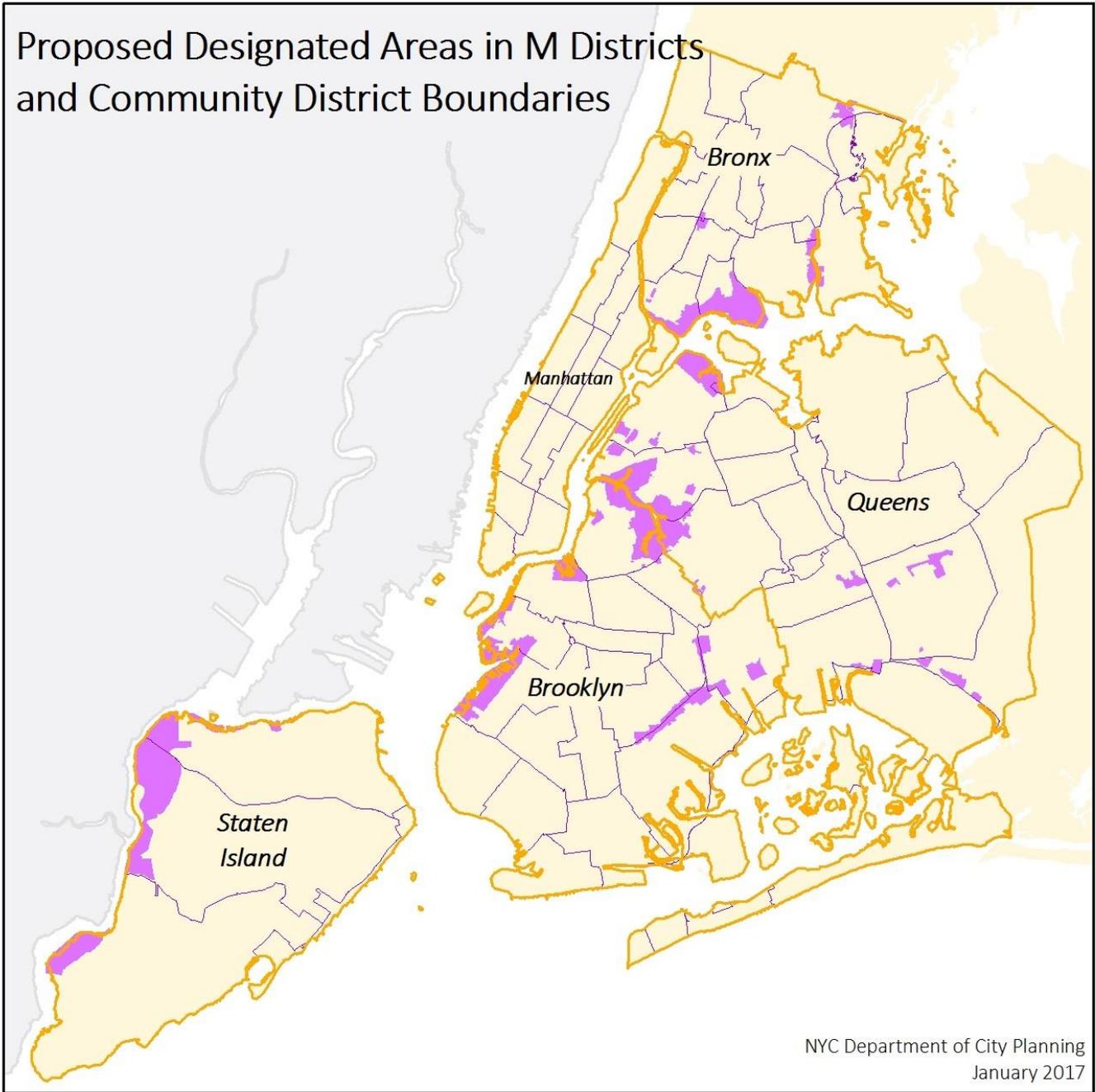


Figure 8: Proposed Designated Areas in M Districts

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 9 and Figure 10). 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 facilities³**

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	

³ 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.

	10	111.3		
	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 9: M And C8 districts outside of Designated Areas

M and C8 districts outside of Designated Areas and Community District Boundaries

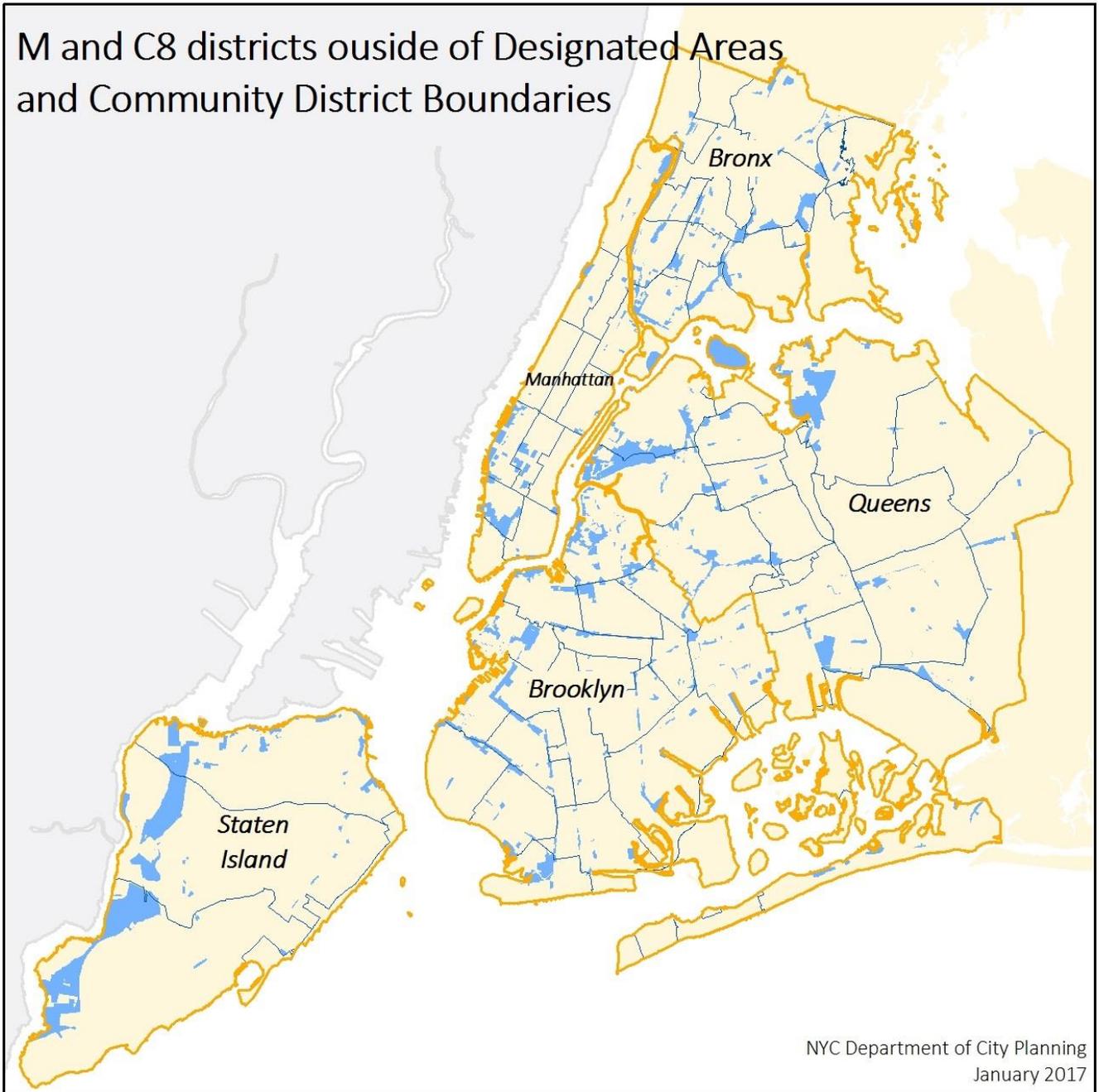


Figure 10: M and C8 districts outside of Designated Areas

B. 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.

C. Existing Conditions

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 11). 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 11), 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.

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

Estimated new self-storage facilities per year, by location*

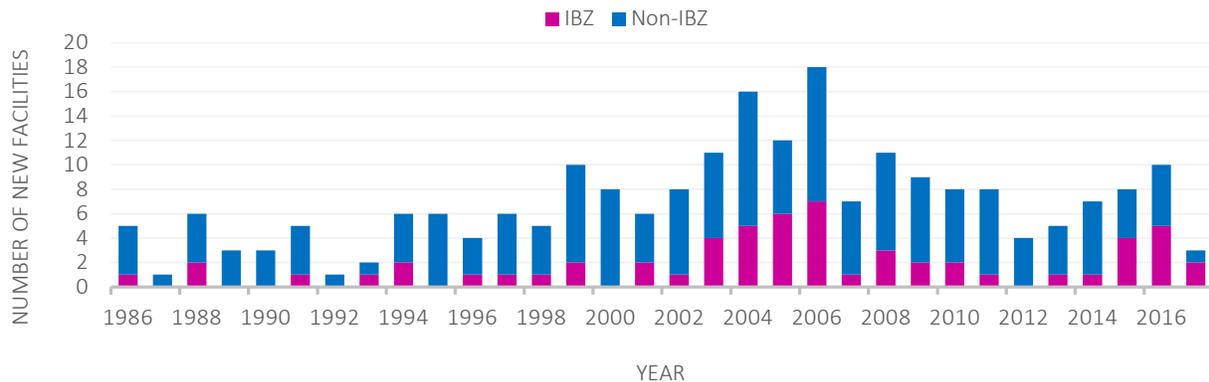


Figure 12: Estimated new self-storage facilities per year, by location
*Approx. 7 percent of existing facilities lack data and are not included in this chart

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

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.

The above chart⁴ (Figure 12) 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

⁴ 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.

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 13 below). Two of the nine self-storage developments in the pre-construction process are to be 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 13: 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.

D. Future No-Action Condition

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.

Number of self-storage facilities projected Citywide by the Build Year (No-Action) 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
Citywide projection
9 self-storage facilities in pre-construction (next 1 year) + 8.5 new facilities per year x 9 years
9 + (9 x 8.5) ≈86

Figure 14: Citywide, self-storage No-Action

As shown by Figure 12, over the last decade, an average of 7.7 new self-storage facilities were built annually. Figure 12 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 12. 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 12, 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 13) 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 14, 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.

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 14). 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 14), 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 15).

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 12). 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 13), 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 15). This includes also the two self-storage facilities which are in the pre-construction phase (see Figure 13).

According to Figure 14 and Figure 15, 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 15: Detailed, self-storage No-Action

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.

E. Future With-Action Condition

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 **Error! Reference source not found.**), 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 13). 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 x 8) ≈ 81

Figure 16: 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.

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 4 and Figure 5).

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 17).

The Proposed Action is not expected to alter any self-storage developments that are currently in the pre-construction phase (see Figure 13). 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 17).

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 17). 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 9 and Figure 10).

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 17).

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 17: 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 9). 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 9). 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.

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 17). 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.

F. 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 18). 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 18: 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.

VI. PROPOSED SCOPE OF WORK FOR THE DEIS

As the Proposed Action may affect various areas of environmental concern and has the potential for significant adverse impacts, a DEIS will be prepared. The DEIS will analyze the Reasonable Worst Case Development Scenario and the likely effects associated with the Proposed Action for all technical areas of concern.

The DEIS will be prepared in conformance with all applicable laws and regulations, including SEQRA (Article 8 of the New York State Environmental Conservation Law) and its implementing regulations found at 6 NYCRR Part 617, New York City Executive Order No. 91 of 1977, as amended, and the Rules of Procedure for CEQR, found at Title 62, Chapter 5 of the Rules of the City of New York.

The DEIS, following the guidance of the *CEQR Technical Manual*, will contain:

- A description of the proposed project and its environmental setting;
- A statement of the environmental impacts of the proposed project, including short-term and long-term effects and any typical associated environmental effects;
- An identification of any adverse environmental effects that cannot be avoided should the proposal be implemented;
- A discussion of the social and economic impacts of the proposed project;
- A discussion of alternatives to the proposed project and the comparable impacts and effects of such alternatives;
- An identification of any irreversible and irretrievable commitments of resources that would be involved in the proposed project should it be implemented;
- A description of mitigation measures proposed to minimize significant adverse environmental impacts;
- A description of the growth-inducing aspects of the proposed project, where applicable and significant;
- A discussion of the effects of the proposed project on the use and conservation of energy resources, where applicable and significant; and
- A list of underlying studies, reports or other information obtained and considered in preparing the statement.

The specific technical areas to be included in the DEIS, as well as their respective tasks and methodologies, are described below.

A. Task 1. Project Description

The first chapter of the EIS introduces the reader to the Proposed Action and sets the context in which to assess impacts. This chapter contains a description of the Proposed Action: its location; the background

and/or history of the proposal; a statement of the purpose and need; a detailed description of the Proposed Action; and discussion of the approvals required, procedures to be followed, and the role of the EIS in the process. This chapter is the key to understanding the Proposed Action and its impact and gives the public and decision makers a base from which to evaluate the Proposed Action.

In addition, the project description chapter will present the planning background and rationale for the actions being proposed and summarize the likely effects of the Proposed Action for analysis in the EIS. The section on approval procedure will explain the zoning text amendment processes, their timing, and hearings before the Community Board, the Borough President's Office, the CPC, and the New York City Council. The role of the EIS as a full disclosure document to aid in decision-making will be identified and its relationship to the discretionary approvals and the public hearings described.

B. Task 2. 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*, regarding Designated Areas in Manufacturing Districts, and also the M and C8 districts, where self-storage development would still be permitted as-of-right.

C. Task 3. Socioeconomic Conditions

The socioeconomic character of an area includes its population, housing, and economic activity. Socioeconomic changes may occur when a project directly or indirectly changes any of these elements. Although socioeconomic changes may not result in impacts under CEQR, they are disclosed if they would affect land use patterns, low-income populations, the availability of goods and services, or economic investment in a way that changes the socioeconomic character of the area. This chapter will assess the Proposed Action's potential effects on the socioeconomic character.

The five principal issues of concern with respect to socioeconomic conditions are whether a Proposed Action would result in significant adverse impacts due to: (1) direct residential displacement; (2) direct business and institutional displacement; (3) indirect residential displacement; (4) indirect business and institutional displacement; and (5) adverse effects on specific industries, pursuant to the *CEQR Technical Manual*.

The Proposed Action is not anticipated to cause adverse impacts with respect to indirect residential displacement, direct business and institutional displacement, indirect residential displacement and indirect business and institutional displacement. Nonetheless, in order to be conservative, these areas will be analyzed in the Draft Environmental Impact Statement (DEIS) per *CEQR Technical Manual* guidelines.

The proposed project *does* have the potential to have adverse effects on specific industries, however. 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 would present a disincentive to the development of self-storage.

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 DEIS. This assessment will take into account the directly affected areas (Designated Areas in Manufacturing Districts) as much as areas where self-storage development will remain permitted as-of-right. Accordingly, the assessment will analyze any potential impacts resulting from the cumulative changes across New York City or in specific neighborhoods as a result of the Proposed Action, as well as those associated with the proposed discretionary actions, discussed as a prototypical/ conceptual analysis.

D. Task 4. 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 Proposed Action 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.

E. Task 5. 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. Based on the *CEQR Technical Manual*, an open space assessment is typically warranted if an action would directly affect an open space or if it would increase the population by more than:

- 350 residents or 750 workers in areas classified as “well-served areas;”
- 25 residents or 125 workers in areas classified as “underserved areas;”
- 200 residents or 500 workers in areas that are not within “well-served” or “underserved areas.”

The Proposed Action is a citywide action that will result in development that may have direct or 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.

F. Task 6. Shadows

The *CEQR Technical Manual* requires a shadows assessment for proposed actions that would result in new structures (or additions to existing structures) greater than 50 feet in height or located adjacent to or across the street from a sunlight-sensitive resource. Such resources include publicly accessible open spaces, important sunlight-sensitive natural features, or historic resources with sun-sensitive features.

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.

G. Task 7. Historic and Cultural Resources

Historic and cultural resources include archaeological (buried) resources and architectural (historic standing structure) resources. The *CEQR Technical Manual* identifies historic and cultural resources as districts, buildings, structures, sites, and objects of historical, aesthetic, cultural, and archaeological importance. Historic and cultural resources include 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).

According to the *CEQR Technical Manual*, a historic and cultural resources assessment is required if there is the potential to affect either archaeological or architectural resources. 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 significant effects to historic and cultural resources.

The proposed project could result in ground disturbance. 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 will analyze the potential for significant adverse impacts based on prototypical scenarios. If warranted, a detailed analysis will be completed.

H. Task 8. Urban Design/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 EIS will be based on prototypical scenarios.

I. Task 9. Natural Resources

According to the *CEQR Technical Manual*, a natural resource is defined as a plant or animal species as well as any area capable of providing habitat for plant and animal species or capable of functioning to support environmental systems and maintain the city's environmental balance. Such resources include surface and groundwater, wetlands, dunes and beaches, grasslands, woodlands, landscaped areas, gardens, and build structures used by wildlife. 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.

It is not possible to evaluate the impacts of any specific development, as the specific location of future development projects are unknown. Therefore, the natural resources assessment will be based on prototypical scenarios.

J. Task 10. 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, which could result in increased ground disturbance in areas where hazardous materials may be present. Accordingly, the chapter will include a discussion, by utilizing a prototypical analysis, of the Proposed Action's potential to result in significant adverse hazardous materials impacts.

K. Task 11. 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 ensure 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.

Due to the generic nature of the Proposed Action, an assessment of the Proposed Action's potential impacts on water and sewer infrastructure will be conducted in the EIS based on a prototypical analysis

L. Task 12. Solid Waste and Sanitation Services

A solid waste assessment determines whether an action 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 EIS will include a preliminary screening assessment of the proposed project's potential to affect solid waste and sanitation services. If warranted, a more detailed analysis will be provided. The assessment will be based on a prototypical analysis, since the specific locations of future development projects are unknown.

M. Task 13. 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*.

Although significant adverse energy impacts are not anticipated, the EIS will include a preliminary screening analysis through utilizing a prototypical analysis to consider projected operational energy consumption. If warranted, a more detailed analysis will be provided.

N. Task 14. Transportation

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 EIS 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.

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.

An assessment of any potential impacts on transit and pedestrians due to the Proposed Action will be explored in the EIS. The EIS will include a preliminary screening assessment of the proposed project's potential to affect transportation including traffic and parking as well as transit and pedestrians. If warranted, a more detailed analysis will be provided.

O. Task 15. 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 EIS using a prototypical analysis, because specific locations of future development projects are unknown.

P. Task 16. Greenhouse Gas Emissions

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.

The EIS for the proposed project will include a preliminary screening assessment of greenhouse gas emissions, and, if warranted, a more detailed analysis will be provided. A prototypical analysis will guide this assessment, because it is not possible to evaluate the impacts of any specific development, as specific locations of future development projects are unknown.

Q. Task 17. 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 accordance with the *CEQR Technical Manual*. While site specific impacts are impossible to predict, prototypes will be developed and utilized.

R. Task 18. Public Health

The *CEQR Technical Manual* defines as its goal with respect to public health, "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.

An assessment of the Proposed Action's potential impacts on public health will be conducted in the EIS 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 are unknown.

S. Task 19. 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.

Methodologies outlined in the *CEQR Technical Manual* will be used to provide an assessment of neighborhood character. This assessment will take into account the directly affected areas (Designated Areas in Manufacturing Districts) as much as areas where self-storage development will remain permitted as-of-right. Accordingly, the assessment will analyze any potential impacts resulting from the cumulative changes across New York City or in specific neighborhoods as a result of the Proposed Action, as well as those associated with the proposed discretionary actions, discussed as a conceptual analysis.

T. Task 20. 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.

This chapter of the EIS will provide a preliminary impact assessment following the guidelines in the *CEQR Technical Manual* and though not anticipated, if additional analysis is required, a detailed assessment will be conducted. The assessment will be guided by a prototypical analysis.

U. Task 21. Mitigation

Where significant adverse impacts have been identified in the analyses discussed above, measures will be assessed to mitigate those impacts, to the extent practicable and feasible. Where impacts cannot be mitigated, they will be described as unavoidable adverse impacts.

V. Task 22. Alternatives

The purpose of an alternatives analysis is to examine reasonable and practicable options that avoid or reduce project-related significant adverse impacts while achieving the goals and objectives of the Proposed Action. The specific alternatives to be analyzed are typically finalized with the lead agency as project impacts become clarified. A No Build Alternative, which describes the conditions that would exist if the Proposed Action was not implemented, is required, and will be analyzed.

The alternatives analysis will be qualitative or quantitative as appropriate. Where project-related significant adverse impacts are identified, a quantitative assessment will be conducted. The level of analysis will depend on an assessment of project impacts determined by the analysis connected with the appropriate tasks.

W. Task 23. Summary EIS Chapters

In accordance with CEQR guidelines, the EIS will include the following three summary chapters, where appropriate to the Proposed Action:

Unavoidable Adverse Impacts - which summarizes any significant adverse impacts that are unavoidable if the Proposed Action is implemented regardless of the mitigation employed (or if mitigation is not feasible).

Growth-Inducing Aspects of the Proposed Action - which generally refer to “secondary” impacts of a Proposed Action that trigger further development.

Irreversible and Irretrievable Commitments of Resources - which summarizes the Proposed Action and its impacts in terms of the loss of environmental resources (loss of vegetation, use of fossil fuels and materials for construction, etc.), both in the immediate future and in the long term.

X. Task 24. Executive Summary

The executive summary will utilize relevant material from the body of the EIS to describe the Proposed Action, its environmental impacts, measures to mitigate those impacts, and alternatives to the Proposed Action. The executive summary will be written in enough detail to facilitate drafting of a notice of completion by the lead agency.