A. INTRODUCTION

Under 2014 *City Environmental Quality Review* (CEQR) *Technical Manual* guidance, a land use analysis evaluates the uses and development trends in the area that may be affected by a proposed action and determines whether the proposed action is compatible with those conditions or may affect them. Similarly, the analysis considers a proposed action's compliance with, and effect on, the area's zoning and other applicable public policies.

As described in Chapter 1, "Project Description," two land use actions (collectively, the "Proposed Actions") are being proposed to facilitate a mixed-use development comprising approximately 654,300 gross square feet (gsf) of commercial/manufacturing uses (the "Proposed Development") on the block bounded by Banker Street to the east, Wythe Avenue to the south, Gem and North 15th streets to the west, and Meserole Avenue to the north (the "Development Site"), in the Greenpoint neighborhood of Brooklyn Community District (CD) 1.

The Proposed Actions include:

- A zoning map amendment to rezone the Development Site (Block 2615, Lots 1, 6, 19, 21, 25, 50, and 125) from M3-1 to M1-5.

- A Large-Scale General Development (LSGD) special permit pursuant to Section 74-743(a)(2) of the Zoning Resolution of the City of New York ("ZR") to allow the Proposed Development to penetrate the required sky exposure plane and the required initial setback distance, allowing a building height in excess of the maximum allowable height under ZR Section 43-43.

The Applicant may also seek discretionary tax incentives from the New York City Industrial Development Agency (NYCIDA).

The Proposed Actions would facilitate a new development with approximately 654,300 gsf, comprising (i) a new and improved approximately 109,300 gsf (95,299 zsf) Acme Smoked Fish processing facility (including accessory administrative space), and (ii) approximately 545,000 gsf (488,479 zsf) of commercial office and retail space (including parking/loading/bike storage spaces). The Acme Smoked Fish processing facility would contain four stories with a height of approximately 74 feet to the building roofline[1]. There would be a mechanical metal louver screen on the roof that is approximately 25 feet high. The Acme Smoked Fish facility would be located on the northeastern portion of the block, fronting on Meserole Avenue and Banker Street. The commercial office/retail component of the Proposed Development would consist of nine stories, with a maximum building height envelope of approximately 178.5 feet to the

[1] It should be noted that, although the Acme Smoked Fish processing facility would reach a roofline height of approximately 74 feet, plus a mechanical louver screen above, the requested LSGD special permit would permit a maximum building height envelope of approximately 104 feet (including mechanical bulkhead). As such, this maximum permitted height will be used for CEQR analysis purposes throughout this document, unless otherwise noted.

building roofline[2], occupying the remainder of the block. There would be a mechanical bulkhead and mechanical equipment screen on the roof that would be approximately 25 feet tall. Although no parking spaces are required under the proposed zoning, up to approximately 150 off-street accessory parking spaces would be provided on the ground level, with curb-cut access via Gem Street. A total of six loading berths would be provided – three for Acme Smoked Fish, with access from Meserole Avenue (two berths) and Banker Street (one berth), and three for the commercial building, with access from Banker Street. The Proposed Development is also anticipated to include partially covered open areas at the southern portion of the Development Site, totaling approximately 21,403 sf.

It is expected that the Proposed Development would be constructed over an approximately 48-month period following approval of the Proposed Actions, with completion and full occupancy expected to occur by late 2024.

B. PRINCIPAL CONCLUSIONS

No significant adverse impacts on land use, zoning, or public policy are anticipated in the future with the Proposed Actions in the primary or secondary study areas in the 2024 analysis year. The Proposed Actions would not directly displace any land uses so as to adversely affect surrounding land uses, nor generate land uses that would be incompatible with land uses, zoning, or public policy in the secondary study area. The Proposed Actions would allow a new development containing a mix of commercial office, light industrial/manufacturing, and local retail uses in an area where there is a strong demand for these particular uses that is well-served by infrastructure and public transportation. Additionally, the Proposed Development would support light industrial/manufacturing uses in the Greenpoint-Williamsburg Industrial Business Zone (the "Greenpoint-Williamsburg IBZ"). As there are currently limited retail uses within the 400-foot study area, the Proposed Development would also introduce ground-floor local retail uses on the Development Site, in an area that does not have an abundance of local retail uses.

The Proposed Development would be built at a density and bulk compatible with neighboring recently developed properties and planned projects, including the recently completed eight-story commercial office and light manufacturing building located at 25 Kent Avenue, three blocks to the south, and the approved seven-story commercial office and light manufacturing building located at 12 Franklin Street, one block to the west. As such, the Proposed Actions would result in a development that, in addition to being appropriate for the area, would complement and improve the diverse land use character of the secondary study area.

In allowing the zoning map amendment, as well as the LSGD special permit, the Proposed Actions would help to create opportunities for uses, such as Acme Smoked Fish, that have limited siting opportunities, and maintain the light industrial and manufacturing character of the Greenpoint and Williamsburg neighborhoods while allowing a mix of other complementary uses that are permitted within the proposed M1-5 zoning district. As such, the Proposed Actions are not anticipated to result in significant adverse land use or zoning impacts.

[2] It should be noted that, although the commercial/retail component of the Proposed Development would reach a roofline height of approximately 172.5 feet, plus a mechanical bulkhead above, the requested LSGD special permit would permit a maximum building height envelope of approximately 178.5 feet to the roofline. As such, this maximum permitted height will be used for CEQR analysis purposes throughout this document, unless otherwise noted.

Finally, based on the Waterfront Revitalization Program (WRP) Consistency Assessment Form (CAF) completed for the Proposed Development (WRP #18-047), three policies required further assessment. The assessment found that the Proposed Development would be consistent with all applicable policies. The Proposed Actions would also be consistent with the public policies outlined in *OneNYC* and *New York Works*, which seek to diversify the City's economic base and increase middle-class employment in the City. Therefore, the Proposed Development would not conflict with any applicable public policies.

C. METHODOLOGY

The purpose of this chapter is to examine the effects of the Proposed Actions on land use, zoning, and public policy and determine whether they would be compatible with those conditions or whether they may adversely affect them. The analysis methodology is based on the guidance of the *CEQR Technical Manual* and examines the Proposed Actions' consistency with land use patterns and development trends, zoning regulations, and other applicable public policies.

According to the *CEQR Technical Manual*, a detailed assessment of land use, zoning, and public policy may be appropriate when a change in land use and zoning would occur and a preliminary assessment cannot succinctly describe land use conditions in the study area. As the Proposed Actions involve a zoning map amendment and a special permit that would result in changes to permitted commercial and manufacturing densities, uses, and bulk, a detailed assessment is necessary to provide a sufficient description and assessment of the effects of the Proposed Actions. In addition, a detailed assessment is needed to sufficiently inform other technical reviews and determine whether changes in land use could affect conditions analyzed in those technical areas. Therefore, this chapter includes a detailed analysis that involves a thorough description of existing land uses within the directly affected area and the broader study area. Following the guidance of the *CEQR Technical Manual*, the detailed analysis describes existing and anticipated future conditions in the 2024 analysis year to a level necessary to understand the relationship of the Proposed Actions to such conditions, assesses the nature of any changes on these conditions that would be created by the Proposed Actions, and identifies those changes, if any, that could be significant or adverse.

Analysis Year

The analysis year is the Proposed Development's anticipated completion date of 2024. Therefore, the future No-Action condition accounts for land use and development projects, initiatives, and proposals that are expected to be completed by 2024.

Study Area Definition

To identify and assess the direct and indirect effects of the Proposed Actions, this analysis has defined two study areas within which the Proposed Actions would have the potential to affect land use or land use trends. Following guidance provided in the *CEQR Technical Manual*, these include a primary study area, consisting of the Development Site subject to the zoning map amendment and special permit (Block 2615, Lots 1, 6, 19, 21, 25, 50, and 125), which would be directly affected by the Proposed Actions, and a secondary study area encompassing properties that have the potential to experience indirect impacts as a result of the Proposed Actions. According to the *CEQR Technical Manual*, the appropriate size of the secondary study area for land use, zoning, and public policy is related to the type and size of the proposed development, as well as the location and context of the area that could be affected by the project. Study

area boundaries vary according to these factors, with suggested study areas ranging from 400 feet for a small project to 0.5 miles for a very large project. Given the geographic scope of the Proposed Actions, affecting a single block, and the scale of the proposed development relative to the density of the surrounding area, a 400-foot radius from the Development Site has been selected as the secondary study area as it is considered unlikely that the Proposed Actions would have indirect effects beyond a 400-foot radius. As shown in Figure 2-1, the secondary study area extends to include Brooklyn lots within an approximate 400-feet boundary of the Development Site[3], and is generally bound by portions of Clifford Place and Dobbin Street to the east, Berry Street and Nassau Avenue to the south, Franklin and North 14th streets to the west, and Calyer and Quay streets to the north.

Data Sources

Existing land uses were identified through review of a combination of sources including 2019 field surveys and secondary sources, comprising the City's 2018 Primary Land Use Tax Lot Output (PLUTO™) data files, online Geographic Information Systems (GIS) databases such as the New York City Open Accessible Space Information System (OASIS, http://www.oasisnyc.net), and NYCityMap (http://gis.nyc.gov/doitt/nycitymap). Other publications and approved environmental review documents that have been completed for projects in the area were also consulted, many of which are discussed in the "Public Policy" section, below. New York City Zoning Maps and the Zoning Resolution of the City of New York (ZR) were consulted to describe existing zoning districts in the study areas and provided the basis for the zoning evaluation of the future No-Action and With-Action conditions. Relevant public policies, recognized by the New York City Department of City Planning (DCP) and other City agencies were utilized to describe existing public policies pertaining to the study areas.

D. DETAILED ASSESSMENT

Existing Conditions

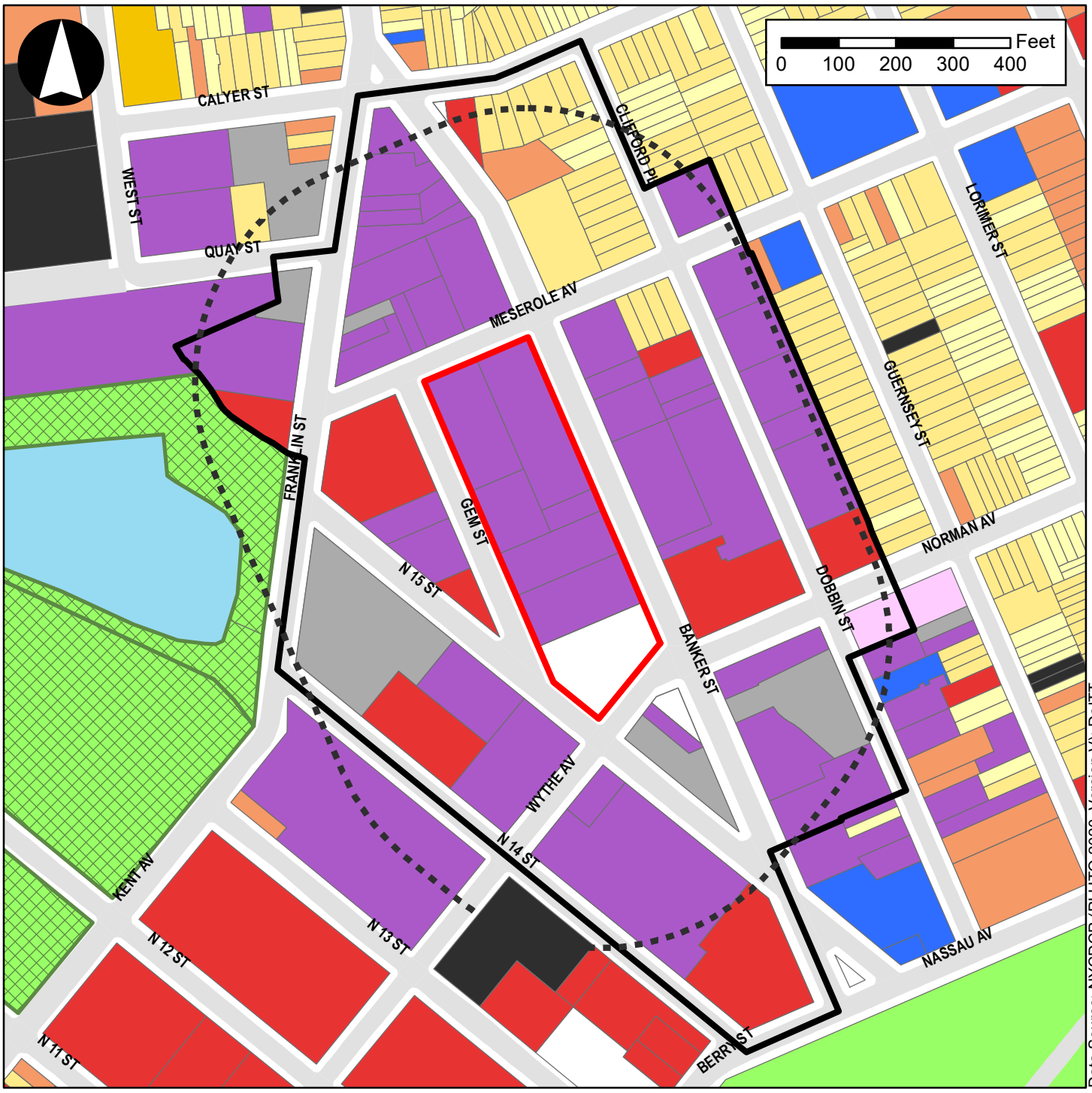
Land Use

PRIMARY STUDY AREA/DEVELOPMENT SITE

As shown in Figure 2-1, the primary study area comprises Block 2615 in its entirety, and is bounded by Banker Street to the east, Wythe Avenue to the south, Gem and North 15th streets to the west, and Meserole Avenue to the north. It is entirely privately-owned and includes approximately 116,756 square feet (sf) of lot area within seven tax lots. Block 2615 contains a mix of industrial/manufacturing uses with open and vehicle storage uses occupying the southern portion of the block. The existing low-rise buildings located within the primary study area mostly date from the 1920s and 1930s, but have undergone various alterations since the 1980s.

The primary study area is the current home of the processing plant and smokehouse for Acme Smoked Fish, a manufacturing/wholesale use. The Acme Smoked Fish facility currently occupies the majority of the primary study area, including Lots 1, 21, 25, and 50 (64,151 sf of total lot area), with frontage on the south side of Meserole Avenue, east side of Gem Street, and the west side of Banker Street. The facility

[3] Secondary study area includes tax lots which have 50 percent or more of their area within a 400-feet radius of the Development Site. Where appropriate, the boundaries of the secondary study area have been expanded to include entire blocks.



Legend

- Primary Study Area (Development Site)
- 400-Foot Radius
- Future Bushwick Inlet Park
- Secondary Study Area

Land Use

- One & Two Family Buildings
- Multi-Family Walkup Buildings
- Multi-Family Elevator Buildings
- Mixed Commercial/Residential Buildings
- Commercial/Office Buildings
- Industrial/Manufacturing
- Transportation/Utility
- Public Facilities/Institutions
- Open Space
- Parking Facilites
- Vacant Land
- All Others or No Data

comprises four interconnected one- and two-story buildings with a total of approximately 72,885 sf of built floor area. Acme Smoked Fish first opened their facility on Gem Street in 1954, and the facility was rebuilt in 1966 after a major fire.

The primary study area also includes Lot 6, an approximately 27,075 sf corner property with frontage on Meserole Avenue and Banker Street. It contains ABC Stone, a stone supplier, which occupies a two-story warehouse (approximately 21,500 sf) at 234 Banker Street and open storage area at the southern end of the property. ABC Stone is currently in the process of moving out and is expected to relocate within the area. The Development Site also includes a single-story, vacant building (approximately 3,800 sf) at 202 Banker Street on Lot 19, as well as the field office and open storage for Corzo Contracting Company, a utility construction company that occupies the southern portion of the primary study area (Lot 125), which intends to relocate within New York City.

The primary study area is served by various public transit options. The Nassau Avenue G subway station (located to the southeast at the intersection of Nassau and Manhattan avenues) is approximately 0.3 miles from the primary study area and the Bedford Avenue L subway station (located to the south at the intersection of Bedford Avenue and North 7th Street) is approximately 0.6 miles from the primary study area. In addition, the B32 bus (connecting Williamsburg Bridge Plaza and Long Island City) runs along Franklin Street/Kent Avenue and Wythe Avenue, the B62 bus (connecting Downtown Brooklyn/Fulton Mall and Long Island City) runs along Bedford and Driggs avenues, and the B43 bus (connecting Lefferts Gardens/Prospect Park and Greenpoint) runs along Manhattan and Graham avenues. The B32 bus also makes a wide variety of connections to other local bus lines along the Broadway commercial corridor in Brooklyn, including connections with the B24, B39, B46, B60, B62, Q54, and Q59 bus lines. The North Williamsburg stop on the East River route of the NYC Ferry is located less than 0.7 miles to the southwest of the primary study area at the western terminus of North 5th Street; the Greenpoint stop on the East River route of the NYC Ferry is located less than 0.7 miles to the northwest of the primary study area at the western terminus of India Street. In addition, there are two CitiBike stations located near the primary study area, one at the corner of Banker Street and Meserole Avenue and one at the corner of North 15th Street and Wythe Avenue.

SECONDARY STUDY AREA

The secondary study area encompasses areas that have the potential to experience indirect impacts as a result of the Proposed Actions. The secondary study area includes portions of 14 blocks and extends to portions of Clifford Place and Dobbin Street to the east, Berry Street and Nassau Avenue to the south, Franklin and North 14th streets to the west, and Calyer and Quay streets to the north. Like the rest of the East River waterfront of Williamsburg and Greenpoint, the secondary study area was developed more than 100 years ago, during Brooklyn's industrial age, when both sides of the East River were dominated by large commercial docks, factories, oil refineries, and shipyards. Further inland from the waterfront, residential neighborhoods developed to house workers for these industrial uses. Over time, as manufacturing operations on the waterfront declined, these neighborhoods developed their unique blend of commercial, residential, and industrial uses.

In recent years, these neighborhoods have grown and adapted. As refineries and shipyards have departed, new businesses have emerged to take their place. Due to their character, proximity to Manhattan, eclectic building typologies, and comparatively lower rents, by the end of the 20th Century, Williamsburg and Greenpoint had become sought-after communities for artists and Manhattan commuters. However, the industrial areas nearest to the waterfront, including the Development Site and other large lots in the vicinity of the primary study area, remained largely underutilized, a product of restrictions on residential use and ever-evolving economic conditions.

New development in the Greenpoint-Williamsburg Industrial Business Zone (IBZ) has tended toward entertainment and nightlife uses and a limited amount of office. However, as described in Chapter 1, "Project Description," Brooklyn as a whole has seen a significant increase in its office inventory in Downtown Brooklyn, DUMBO, the Navy Yard and Williamsburg over the past five years.

Additional commercial development is also currently under construction, including the approximately 700,000 sf Panorama commercial office and retail project, a 5-building commercial complex in Columbia Heights, and the approximately 600,000 sf new building at 47 Hall Street near the Brooklyn Navy Yard, among others. The commercial office space facilitated by the Proposed Actions would contribute toward addressing an increase in demand from the media, technology, and creative industries for new commercial space in Downtown Brooklyn, DUMBO, and Williamsburg. Commonly cited reasons given for this demand include the desire of tenants to occupy non-traditional converted loft-spaces and the attraction of operating near the communities in which their workforces reside. Office spaces that are accessible, and offer efficient space and amenities are highly competitive. In particular, significantly renovated office buildings located adjacent to transit-accessible waterfronts have generally leased rapidly. Small and mid-sized companies, which make up most of Brooklyn's business growth, as well as startups are driving the market and are seeking to locate in areas in close proximity to, or otherwise accessible by, their workforces, near public transportation, and growing residential markets. The success of the Greenpoint and Williamsburg residential markets is contributing to the growth of the commercial market in the area and the associated demand for additional office space. The demand for commercial office space in Greenpoint-Williamsburg has stimulated the development of several new mixed-use developments, including the recently completed 25 Kent Avenue development, as well as the 103 North 13th Street development, which is under development, and the planned 12 Franklin Street development. These three development projects are discussed in greater detail below.

As presented in Figure 2-1 and Table 2-1, the secondary study area is predominantly comprised of industrial/manufacturing buildings (approximately 50.8 percent of built gsf in the secondary study area). Residential uses account for nearly 24 percent of the building area in the secondary study area, and are largely concentrated on the block bounded by Calyer Street, Clifford Place, Meserole Avenue, and Banker Street, as well as at the southwest corner of Meserole Avenue and Dobbin Street. Residential uses generally consist of low-rise two-to four-story buildings, including two-and three-family residences, as well as walk-up multi-unit residential apartment buildings. Commercial uses comprise almost 18 percent of the building area, and include creative workspaces, restaurants, retail, and studios. Parking facilities account for nearly five percent of the building area in the study area. There is one mixed-use commercial/residential use located on Banker Street. There are no multi-family elevator residential, public facility/institution, open space, or vacant land uses located within the secondary study area.[4]

[4] Although no tax lots which have 50 percent or more of their area within the 400-foot radius include open space uses, it should be noted that McCarren Park is located one block to the south of the secondary study area. Additionally, the future 27-acre Bushwick Inlet Park, which the City is developing as a new public open space, is located just outside of the secondary study area.

TABLE 2-1
Existing Land Uses within the Secondary Study Area

Land Use	Number of Lots	Percentage of Total Lots (%)	Lot Area (sf)	Percentage of Total Lot Area (%)	Building Area	Percentage of Total Building Area (%)
Residential	22	28.9	70,388	9.8	194,362	23.8
One- & Two-Family Buildings	*3*	*3.9*	*5,500*	*0.8*	*6,632*	*0.8*
Multi-Family Walkup Buildings	*19*	*25.0*	*64,888*	*9.0*	*187,730*	*23.0*
Multi-Family Elevator Buildings	*0*	*0.0*	*0*	*0.0*	*0*	*0.0*
Mixed Commercial/Residential Buildings	1	1.3	9,145	1.3	18,144	2.2
Commercial/Office Buildings	9	11.8	137,219	19.1	143,662	17.6
Industrial/Manufacturing	36	47.4	405,629	56.4	414,721	50.8
Transportation/Utility	1	1.3	7,000	1.0	7,000	0.9
Public Facilities & Institutions	0	0.0	0	0.0	0	0.0
Open Space	0	0.0	0	0.0	0	0.0
Parking Facilities	5	6.6	86,978	12.1	39,010	4.8
Vacant Land	0	0.0	0	0.0	0	0.0
All Others or No Data	2	2.6	3,002	0.4	0	0.0
Total	***76***	***100.0***	***719,361***	***100.0***	***816,899***	***100.0***

Source: New York City PLUTO™ data files, 2019 field visits.
Note: Total lot areas and built areas included for all lots which have 50 percent or more of their area within a 400-feet radius of the Primary Study Area.

Zoning

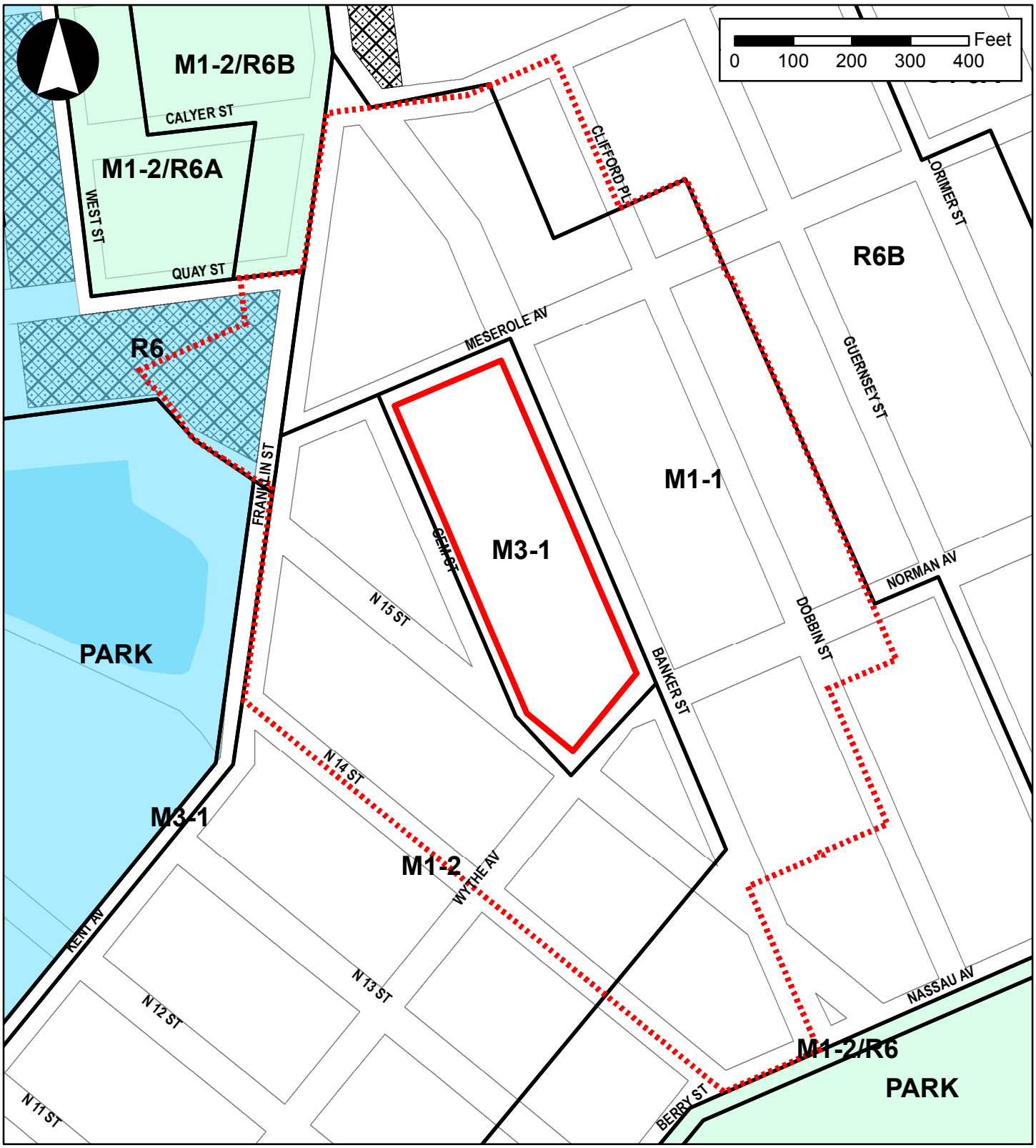
PRIMARY STUDY AREA

As shown in Figure 2-2, the primary study area is located in an M3-1 zoning district. M3-1 zoning districts, which permit a maximum FAR of 2.0 for manufacturing and commercial uses, are mapped along limited portions of the East River waterfront in Williamsburg between the Williamsburg Bridge and Bushwick Inlet Park, and along the waterfront of Newton Creek, which serves as the northernmost border of Brooklyn and Queens. A narrow M3-1 district is mapped along the eastern edge of the future Bushwick Inlet park along Kent Avenue just beyond the secondary study area. Larger M3-1 districts are mapped to the west of Kent Avenue between North 9th and North 7th Streets and between North 4th and Grand Streets along the East River Waterfront, and to the east of Kent Avenue between Grand and South 3rd Streets. An expansive M3-1 district covers most of the northeastern and eastern portions of Greenpoint along the waterfront of Newtown Creek.

Building heights in M3-1 districts are governed by a sloping sky exposure plane, which begins at a height of 60 feet, or four stories, whichever is less, above the street line. M3 districts are designated for areas with heavy industries that generate noise, traffic or pollutants. Typical uses include power plants, solid waste transfer facilities and recycling plants, and fuel supply depots. Even in M3 districts, uses with potential nuisance effects are required to conform to minimum performance standards as set forth in the Zoning Resolution. No new residential or community facility uses are permitted. M3-1 districts are subject to parking requirements based on the type of use and the size of an establishment.

SECONDARY STUDY AREA

Zoning classifications within the secondary study area, which are also shown in Figure 2-2 and listed in Table 2-2, largely consist of high performance, low-density manufacturing zoning districts, including M1-1 and M1-2. An R6 residential zoning district with a C2-4 commercial overlay is mapped along the northwestern edge of the secondary study area on the west side of Franklin Street.



Legend

- Primary Study Area (Development Site)
- Secondary Study Area
- M3-1 Zoning District Boundaries
- C2-4 Commercial Overlay
- Special Mixed Use District (MX-8)
- Waterfront Access Plan Area

TABLE 2-2
Existing Zoning Districts within the Secondary Study Area

Name	Definition/General Use	Maximum FAR
Residential Districts		
R6	R6 districts are widely mapped in built-up, medium-density areas. Developers can choose between Height Factor and Quality Housing bulk regulations.	R: 0.78-2.43 (Height Factor); 2.2-3.0 (Quality Housing); 2.42-3.6 (Inclusionary Housing); C: 0.0; CF: 4.8; M: 0.0
Commercial Districts		
C2-4 (overlay)	C2 commercial overlays are mapped within residential districts along streets that serve local retail needs. In mixed-use buildings, commercial uses are limited to one or two floors and must always be located below the residential uses. C2 commercial overlay districts permit a slightly wider range of uses than C1 districts.	R & CF: Same as underlying R district; C: 1.0 within R1-R5 districts & 2.0 within R6-R10 districts; M: 0.0
Manufacturing Districts		
M1-1	M1 districts are often buffers between M2 or M3 districts and adjacent residential or commercial districts. M1 districts typically include light industrial uses, which must meet the stringent M1 performance standards.	R: 0.0; C: 1.0; CF: 2.4[1]; M: 1.0
M1-2		R: 0.0; C: 2.0; CF: 4.8[1]; M: 2.0

Source: Zoning Resolution of the City of New York
Notes: R=Residential; C=Commercial; CF=Community Facility; M=Manufacturing
[1] Nursing homes and non-profit residential facilities limited to residential FAR, except by special permit

The 2005 Greenpoint-Williamsburg Rezoning resulted in new zoning designations that permitted lighter industrial uses as well as residential uses in certain areas. The Greenpoint-Williamsburg Rezoning included street demappings, zoning text amendments, and zoning map changes, including a zoning map change within the secondary study area. To better reflect the types of manufacturing uses that had come to occupy the area, and to ensure that new industrial uses in the area would be fully enclosed and compatible with the nearby residential and mixed-use neighborhoods, the 2005 Greenpoint-Williamsburg Rezoning changed the zoning of several blocks located in the southern and western portions of the secondary study area from a heavy M3-1 manufacturing district to an M1-2 district. M1-2 districts limit activity to light industrial and commercial uses, as described above. As indicated in Chapter 1, "Project Description," the primary study area was initially proposed for rezoning (from M3-1 to M1-2) as part of the 2005 Greenpoint-Williamsburg Rezoning; however, it was ultimately excluded from the rezoning area in response to comments received from Acme Fish Company to facilitate the continued operation and expansion of their active business.

Waterfront Access Plan BK-1 (WAP BK-1): Greenpoint-Williamsburg

As shown in Figure 2-2, the Greenpoint-Williamsburg Waterfront Access Plan Area (WAP) is mapped two blocks to the west of the primary study area. The Greenpoint-Williamsburg WAP, also known as WAP BK-1, was established as part of the 2005 Greenpoint-Williamsburg Rezoning and formalized within the Zoning Resolution. The Greenpoint-Williamsburg WAP identifies specific locations for required waterfront public access areas on private development parcels; establishes requirements for widened shore public walkways, parks, and plazas; allows flexibility for different shore treatments and quality landscape design; and establishes parameters for consistency of design along the waterfront. It also specifies the locations of upland connections and visual corridors to be established as waterfront parcels are developed. Parcel 19 of the WAP is mapped two blocks to the west of the primary study area. Parcel 19, along with adjacent Parcels 20, 21, and 22, are designated as public parks under ZR Section 62-931(d)(10). As with most developments on waterfront blocks, developments on properties in the WAP BK-1 require certifications from the Chair of the CPC.

To facilitate the creation of the future waterfront park on Parcels 19, 20, 21, and 22, portions of several streets to the southwest of the primary study area were de-mapped in conjunction with the 2005 Greenpoint-Williamsburg Rezoning. The resultant parcel, mapped as "Inlet Park," is bounded by Quay

Street to the north, North 9th Street to the south, Franklin Street and Kent Avenue to the east, and the U.S. Pierhead Line to the west. While the City now owns the entirety of the land to be developed as Bushwick Inlet Park, only a portion of the area has been developed into public parkland. Site remediation is required on much of the future parkland before the land ultimately can be redeveloped. However, the first phase of Bushwick Inlet Park, which occupies the block between North 9th and North 10th streets, as well as the eastern portion of the block bounded by North 11th and North 12th streets and Kent Avenue, is publicly accessible.

Industrial Business Incentive Areas

The Industrial Business Incentive Area (IBIA) zoning regulations were established in 2016 with the approval of the 25 Kent Avenue project application (ULURP #: C 160124 ZSK et al, effective July 14, 2016), which is located just south of the secondary study area and has recently been completed on the block bounded by North 12th Street, Kent Avenue, North 13th Street, and Wythe Avenue. That action amended the ZR text with a new section, ZR Section 74-96, that allows modifications to the use, bulk, and accessory off-street parking and loading requirements for properties within specified IBIAs by City Planning Commission (CPC) special permits pursuant to ZR Sections 74-962 and 74-963. Within the secondary study area, the block directly to the west of the Development Site, bounded by Meserole Avenue, Gem Street, North 15th Street, and Franklin Street, has also been designated as an IBIA in 2019 to facilitate a mixed-use commercial and industrial development at 12 Franklin Street (CEQR #: 18DCP099K, ULURP #: C 180387 ZSK; N 180388 ZRK; 180389 ZSK) comprising three tax lots (Block 2614, Lots 1, 3 and 8). To date, there have been three approved IBIA applications, including 25 Kent Avenue and 12 Franklin Street, as well as a development project located at 103 North 13th Street (CEQR #: 18DCP182K, ULURP #: N 190083 ZRK; C 190084 ZSK; 190085 ZSK), which have established three IBIAs (see Figure 2-3). All three of these projects sought special permits pursuant to ZR § 74-96 to incentivize the construction of mixed-use commercial and manufacturing buildings that allocate a portion of their floor area to certain light industrial uses, allowing additional floor area devoted to certain types of commercial and light industrial uses.

Public Policy

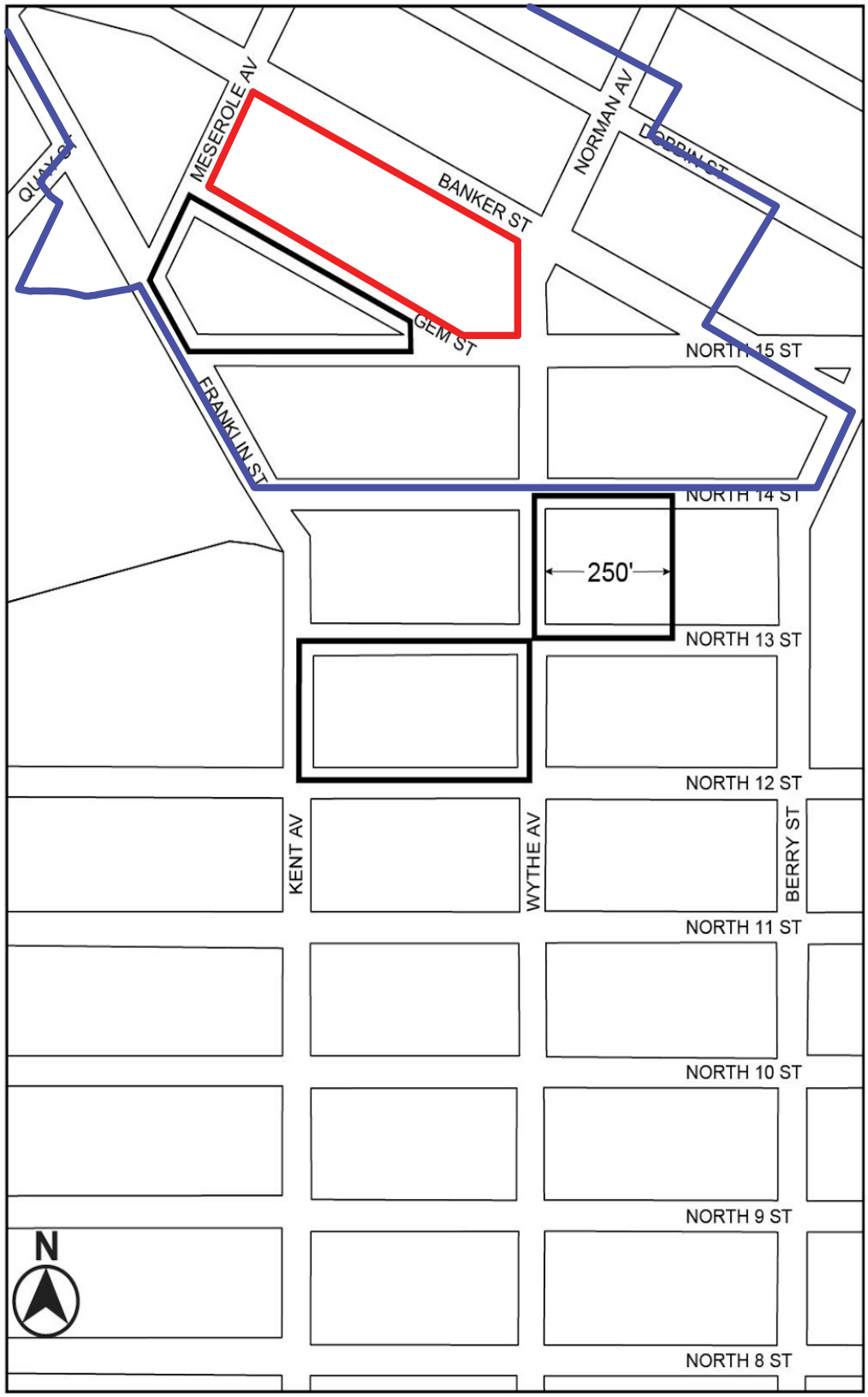
In addition to zoning, officially adopted and promulgated public policies also describe the intended use applicable to an area or particular site(s) in New York City. These include Urban Renewal Plans, 197-a Plans, Industrial Business Zones (IBZs), the New York City Comprehensive Waterfront Plan, the Criteria for the Location of City Facilities ("Fair Share" criteria), Solid Waste Management Plan, Business Improvement Districts ("BIDs"), the New York City Landmarks Law, the Waterfront Revitalization Program ("WRP"), and OneNYC. Some of these policies have regulatory status, while others describe general goals. They can help define the existing and future context of the land use and zoning of an area.

Public policies applicable to the study areas are discussed below. The Proposed Actions' consistency with each of these policies is assessed in the "The Future with the Proposed Actions (With-Action Condition)" section of this chapter. The primary and secondary study areas are located within the boundaries of the Greenpoint-Williamsburg IBZ, the Greenpoint 197-a Plan area, North Brooklyn Empire Zone, and the City's Coastal Zone. Additionally, applicable public policies include OneNYC, Industrial Action Plan and New York Works.

GREENPOINT-WILLIAMSBURG INDUSTRIAL BUSINESS ZONE (IBZ)

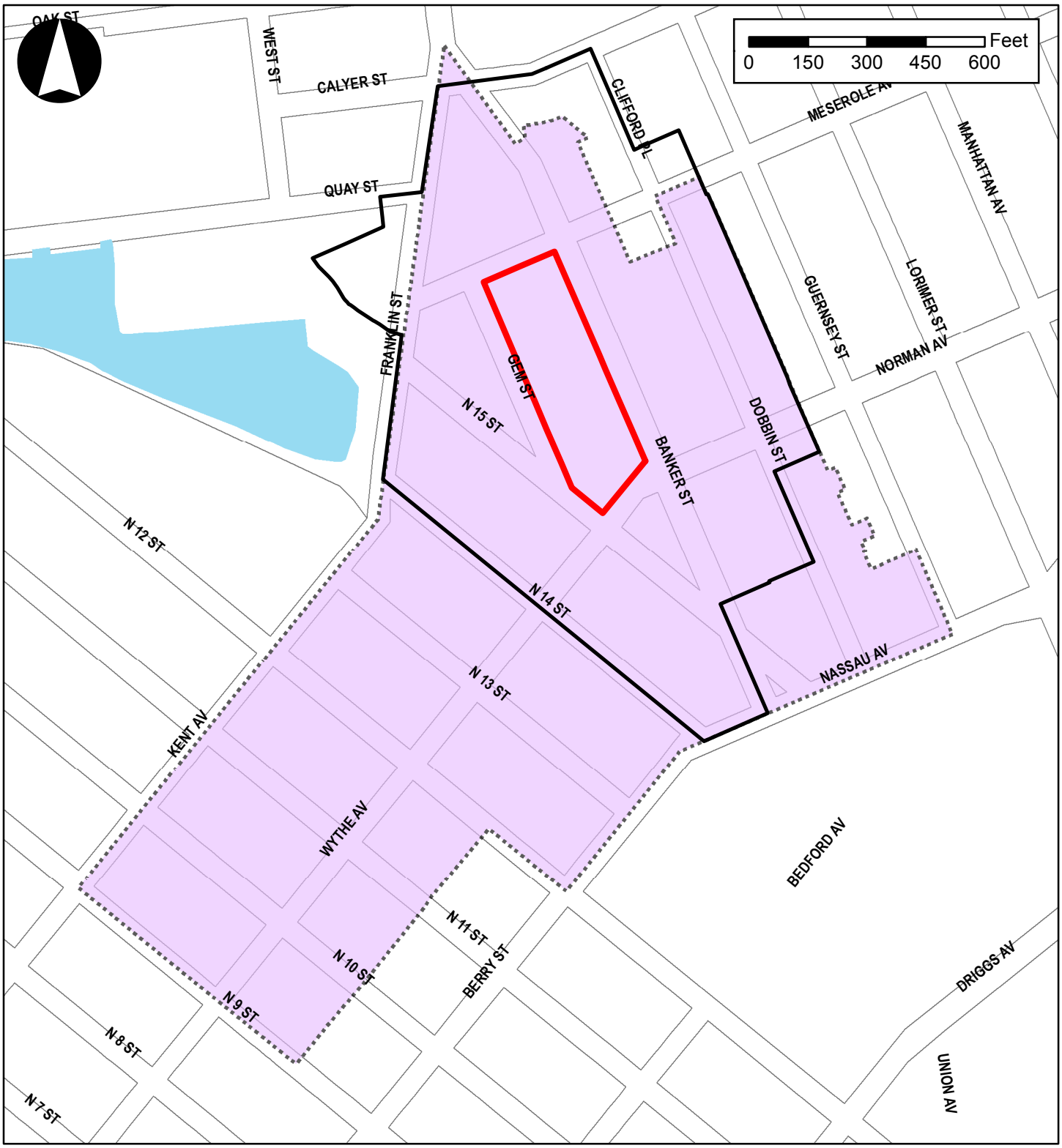
As shown in Figure 2-4, the primary study area and most of the secondary study area are located within the Greenpoint-Williamsburg IBZ. The Greenpoint-Williamsburg IBZ covers over twenty blocks (or portions thereof) on the border of the Greenpoint and Williamsburg neighborhoods, and is generally bounded by Calyer Street and Meserole Avenue to the north, Kent Avenue/Franklin Street to the west,

Industrial Business Incentive Areas



Source: Zoning Resolution Section 74-96

Greenpoint-Williamsburg Industrial Business Zone (IBZ)



Legend

- Primary Study Area (Development Site)
- Secondary Study Area
- Greenpoint Williamsburg Industrial Business Zone (IBZ)

Nassau Avenue/Berry Street and North 12th and North 13th streets to the south, and Banker, Dobbin, and Guernsey streets to the east. In 2006, the Mayor's Office for Industrial and Manufacturing Businesses ratified the establishment of 16 IBZs in which the City provides expanded assistance services to industrial firms in partnership with local development groups. Since 2006, additional IBZs have been established and the boundaries of select IBZs modified. There are currently 21 IBZs throughout New York City. Usually built upon pre-existing In-Place Industrial Parks, IBZs offer various incentives to prevent industrial uses from relocating outside of the City and represent a commitment by the City not to rezone these areas for residential uses.

Planning studies are performed to determine changes that can be made to improve business efficiency within the City's IBZs. These changes can include traffic and parking monitoring, clustering of similar businesses, and IBZ-specific marketing. Higher regulation and steeper penalties for illegal conversions, as well as a guarantee not to rezone to residential districts, help to alleviate real estate uncertainty. Tax incentives also encourage new industrial uses to move to these areas of the City.

Within an IBZ, Industrial Business Solutions Providers offer industrial firms guidance on accessing appropriate financial and business assistance programs, navigating and complying with regulatory requirements, developing workforces, and ensuring the neighborhood is well-maintained. The Industrial Business Solutions Provider for the Greenpoint-Williamsburg IBZ is Evergreen: Your North Brooklyn Business Exchange.

NORTH BROOKLYN EMPIRE ZONE (EZ)

As shown in Figure 2-5, the primary study area (Development Site) and portions of the secondary study area are located within the North Brooklyn Empire Zone (EZ), which includes parts of Greenpoint, Williamsburg, and the Brooklyn Navy Yard. The New York State EZ program was created in 1986 (originally titled "Economic Development Zone"), and the North Brooklyn EZ was established in 1998. "Area 2" of the North Brooklyn EZ was added in 2006, reflecting the establishment of the Greenpoint-Williamsburg IBZ in that same year. In total, there are eleven Empire Zones in New York City, which are administered locally by the New York City Department of Small Business Services (SBS), in partnership with Empire State Development (ESD), New York State's lead economic development agency, and the New York State Departments of Labor and Taxation and Finance.

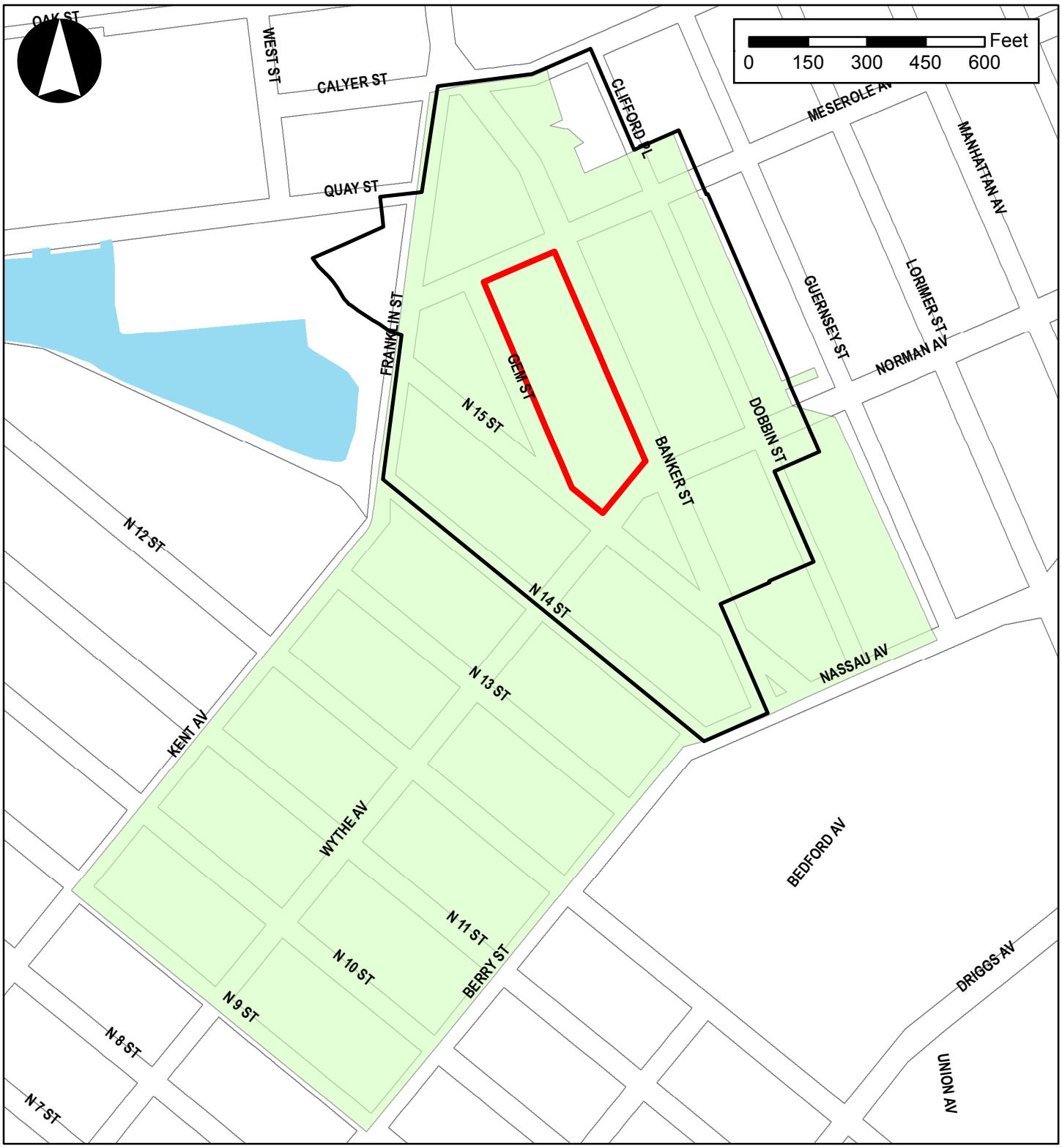
The New York State EZ program was created to make New York more competitive and stimulate economic growth through incentives designed to attract new businesses to New York State and to enable existing businesses to expand and create additional jobs. Specifically, the EZ program encourages development in designated areas by offering an array of incentives in the form of employment, investment, real property, tax credits, and utility discounts.

GREENPOINT 197-A PLAN

Under Section 197-a of the New York City Charter, community boards may propose plans for the development, growth, and improvement of land within their districts. The plans are reviewed in accordance with standards and rules of procedure for 197-a plans, which were developed and adopted by the CPC. Once approved by CPC and adopted by the City Council, as submitted or modified, 197-a plans serve as policy guides for subsequent actions by City agencies.

In 1998, Brooklyn Community Board (CB) 1 submitted the Greenpoint 197-a plan, which was officially adopted in January 2002. The plan's study area, as modified by the CPC, is generally coterminous with zip code 11222 and is bounded by the East River to the west, Newtown Creek to the north and east, and North 12th Street, Bayard Street, Meeker Avenue, Metropolitan Avenue, Maspeth Avenue, Morgan

North Brooklyn Empire Zone



Legend

- Primary Study Area (Development Site)
- Secondary Study Area
- North Brooklyn Empire Zone

Avenue, and the Brooklyn-Queens Expressway (BQE) to the south. The primary study area (Development Site) and most of the secondary study area are located within the boundaries of the Greenpoint 197-a plan.

The Greenpoint 197-a Plan was the result of over a decade of effort by residents, community organizations, business leaders, and Brooklyn CB 1 to create a blueprint for future development in Greenpoint, facilitate quality of life improvements in the community, and maximize Greenpoint's potential. The guiding principles of the 197-a Plan were to establish zoning districts that would foster market-rate housing, affordable housing, and commercial redevelopment. The plan's recommendations for improving access to the waterfront and redeveloping industrial land into mixed-use residential, manufacturing, and parks were largely addressed in the 2005 Greenpoint-Williamsburg Rezoning. In addition to the waterfront recommendations, the Greenpoint 197-a Plan also calls for the promotion of neighborhood-scale retail development to serve the needs of the local community and maintain the variety of shops and services along the area's retail corridors; encouraging non-polluting businesses; and creating economic development programs to retain non-polluting businesses.

WILLIAMSBURG WATERFRONT 197-A PLAN

The Williamsburg Waterfront 197-a Plan (proposed in 1998 and adopted in 2002) focuses on the East River waterfronts of three neighborhoods in the southern portion of Brooklyn CD 1: Northside, Southside, and South Williamsburg. The Williamsburg Waterfront 197-a Plan area extends south from Bushwick Inlet (located near North 14th Street) to the point at which the BQE passes the Brooklyn Navy Yard, and is generally two blocks deep along the waterfront. The planning area extends farther inland at two points to connect to McCarren Park to the north and Continental Army Plaza at the foot of the Williamsburg Bridge. The southern portion of the secondary study area is located within the Williamsburg Waterfront 197-a plan.

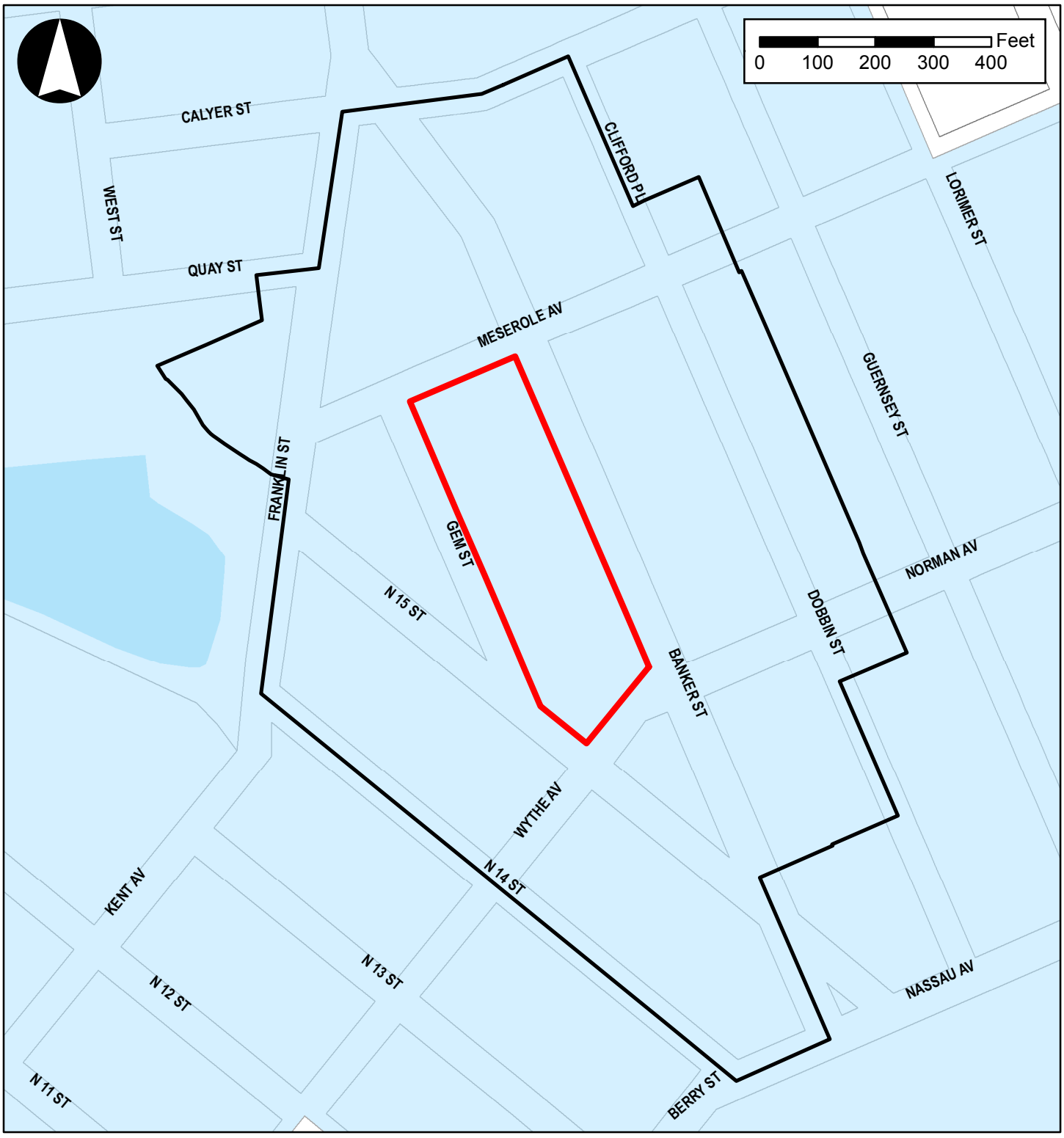
The major goals of the Williamsburg Waterfront 197-a Plan were to: increase waterfront access and public open space; encourage growth along the waterfront consistent with the scale and character of adjacent neighborhoods; foster mixed-use development in the Northside and Southside and residential development in South Williamsburg; promote a clean and safe living and working environment; promote local economic development that provides jobs and strengthens the residential and retail sectors; and support and strengthen existing ethnic and income diversity. The plan's recommendations were largely addressed in the 2005 Greenpoint-Williamsburg Rezoning.

WATERFRONT REVITALIZATION PROGRAM

As shown in Figure 2-6, the primary study area and portions of the secondary study area are located within the City's designed coastal zone. Projects that are located within the designated boundaries of New York City's Coastal Zone must be assessed for their consistency with the City's Waterfront Revitalization Program (WRP).

Legislative and Regulatory Background

The federal Coastal Zone Management Act (CZMA) of 1972 was enacted to support and protect the distinctive character of the waterfront and to set forth standard policies for reviewing proposed development projects along coastlines. The program responded to City, State, and Federal concerns about the deterioration and inappropriate use of the waterfront. In accordance with the CZMA, New York State adopted its own Coastal Management Program (CMP), which provides for local implementation when a municipality adopts a local waterfront revitalization program, as is the case in New York City. The New York City WRP is the City's principal coastal zone management tool. The WRP was originally adopted in



Legend

- Primary Study Area (Development Site)
- Secondary Study Area
- Coastal Zone Boundary

1982 and approved by the New York State Department of State (NYSDOS) for inclusion in the New York State CMP. The WRP encourages coordination among all levels of government to promote sound waterfront planning and requires consideration of the program's goals in making land use decisions. NYSDOS administers the program at the State level, and the New York City Department of City Planning (NYCDCP) administers it at the City level. The WRP was revised and approved by the City Council in October 1999. In August 2002, NYSDOS and federal authorities (i.e., the U.S. Army Corps of Engineers [USACE] and the U.S. Fish and Wildlife Service [USFWS]) adopted the City's ten WRP policies for most of the properties located within its boundaries.

In October 2013, the City Council approved revisions to the WRP in order to proactively advance the long-term goals laid out in Vision 2020: The New York City Comprehensive Waterfront Plan, released in 2011. The changes solidify New York City's leadership in the area of sustainability and climate resilience planning as one of the first major cities in the U.S. to incorporate climate change considerations into its Coastal Zone Management Program. They also promote a range of ecological objectives and strategies, facilitate interagency review of permitting to preserve and enhance maritime infrastructure, and support a thriving, sustainable working waterfront. The NYSDOS approved the revisions to the WRP on February 3, 2016. The U.S. Secretary of Commerce concurred with the State's request to incorporate the WRP into the New York State CMP.

New York City Panel on Climate Change: Projections

In 2013, the New York City Panel on Climate Change (NPCC) released a report (*Climate Risk Information 2013: Observations, Climate Change Projections, and Maps*) outlining New York City-specific climate change projections to help respond to climate change and accomplish PlaNYC goals, which are described below. The 2013 NPCC report predicted future City temperatures, precipitations, sea levels, and extreme event frequency for the 2020s and 2050s. Subsequently, in January 2015, the Second NPCC (NPCC2) released an updated report that presented the full work of the NPCC2 from January 2013 to 2015 and includes temperature, precipitation, sea level, and extreme event frequency predictions for the 2081 to 2100 time period. While the projections will continue to be refined in the future, current projections are useful for present planning purposes and to facilitate decision-making in the present that can reduce existing and near-term risks without impeding the ability to take more informed adaptive actions in the future. Specifically, the NPCC2 report predicts that mean annual temperatures will increase by 2.0 to 2.8˚F, 4.1 to 5.7˚F, 5.3 to 8.8˚F, and 5.8 to 10.3˚F by the 2020s, 2050s, 2080s, and 2100, respectively; total annual precipitation will rise by one to eight percent, four to 11 percent, five to 13 percent, and -one to +19 percent by the 2020s, 2050s, 2080s, and 2100, respectively; sea level will rise by four to eight inches, 11 to 21 inches, 18 to 39 inches, and 22 to 50 inches by the 2020s, 2050s, 2080s, and 2100, respectively; heat waves and heavy downpours are also very likely to become more frequent, more intense, and longer in duration, with coastal flooding very likely to increase in frequency, extent, and elevation.

ONENYC (PREVIOUSLY PLANYC)

In April 2015, Mayor Bill de Blasio released OneNYC, a comprehensive plan for a sustainable and resilient city for all New Yorkers that speaks to the profound social, economic, and environmental challenges faced. OneNYC is the update to the sustainability plan for the City started under the Bloomberg administration, previously known as *PlaNYC 2030: A Greener, Greater New York*. Growth, sustainability, and resiliency remain at the core of OneNYC, but with the poverty rate remaining high and income inequality continuing to grow, the de Blasio administration added equity as a guiding principle throughout the plan. In addition to the focuses of population growth; aging infrastructure; and global climate change, OneNYC brings new attention to ensuring the voices of all New Yorkers are heard and to cooperating and coordinating with regional counterparts. Since the 2011 and 2013 updates of

PlanNYC, the City has made considerable progress towards reaching original goals and completing initiatives. OneNYC includes updates on the progress towards the 2011 sustainability initiatives and 2013 resiliency initiatives and also sets additional goals and outlines new initiatives under the organization of four visions: growth, equity, resiliency, and sustainability.

Goals of the plan are to make New York City:

- A Growing, Thriving City—by fostering industry expansion and cultivation, promoting job growth, creating and preserving affordable housing, supporting the development of vibrant neighborhoods, increasing investment in job training, expanding high-speed wireless networks, and investing in infrastructure.
- A Just and Equitable City—by raising the minimum wage, expanding early childhood education, improving health outcomes, making streets safer, and improving access to government services.
- A Sustainable City—by reducing greenhouse gas emissions, diverting organics from landfills to attain Zero Waste, remediating contaminated land, and improving access to parks.
- A Resilient City—by making buildings more energy efficient, making infrastructure more adaptable and resilient, and strengthening coastal defenses.

10-POINT INDUSTRIAL ACTION PLAN

The 10-Point Industrial Action Plan, announced in November 2015, outlines tools and strategies to strengthen and invest in New York City's core industrial areas, including IBZs, and provides essential protections against non-industrial uses and development that will help ensure that existing manufacturing firms and new businesses have the space and support they need to thrive. The Industrial Action Plan also affirms the Administration's commitment to strengthening the City's core industrial areas and aims to support industrial job growth in IBZs, New York City's most active manufacturing zones. It also establishes a new $150 million loan and grant fund for new and growing industrial businesses, helps firms access advanced technologies like 3D printing, and opens new career centers to connect New Yorkers directly with industrial employers. The Plan was enacted to help achieve three major goals: to protect and strengthen core industrial areas; invest in the long-term development of industrial and manufacturing businesses; and prepare New York's labor force for future industrial and manufacturing jobs.

NEW YORK WORKS

In June 2017, Mayor Bill de Blasio released New York Works, a 10-year economic development plan to invest in and support new industries and employment opportunities, as well as raise wages, train New Yorkers for new careers, and create jobs. New York Works includes 25 initiatives to spur the creation of 100,000 new quality jobs in key sectors that have the potential to support well-paid jobs, including cyber security, freight, life sciences and healthcare, virtual reality, culture, tech, manufacturing, and apprenticeships. As affordability has persisted as an issue for many New Yorkers, this plan attempts to identify opportunities to spur job creation for jobs paying more than $50,000 a year, making New York a more affordable place to live and work. The plan comprises three broad objectives:

- Invest in the creation of middle-class jobs.
- Ensure those jobs are accessible to New Yorkers.
- Prepare for jobs of the future.

The plan seeks to create 25,000 jobs through investments in existing and emerging commercial centers across the five boroughs to support jobs closer to where New Yorkers live, and strengthen core job

markets and global competitiveness. The plan indicates the demand for office space in New York City is projected to grow by over 60 million square feet by 2025, with nearly half of the demand outside of Manhattan. Activating and increasing the supply of commercial office space is essential to expanding opportunity and increasing the number of middle income jobs from private sector professional services based in offices. The plan also outlines several strategies for public support, including modernizing and repurposing City-owned properties for commercial or manufacturing uses, financing and tax incentives, and infrastructure investments.

The Future without the Proposed Actions (No-Action Condition)

Land Use

PRIMARY STUDY AREA

In the 2024 future without the Proposed Actions, without a new state-of-the-art purpose-built facility for its operations, Acme Smoked Fish would strongly consider relocating outside of New York State. As such, for analysis purposes, it is assumed that in absence of the Proposed Actions Acme Smoked Fish would vacate its buildings on the site (Lots 1, 21, 25, and 50). Lot 6, which is currently occupied by ABC Stone, is also expected to be vacated in the No-Action, as the business is currently in the process of moving out. Therefore, all the existing businesses at the Development Site are anticipated to be directly displaced irrespective of the Proposed Actions.

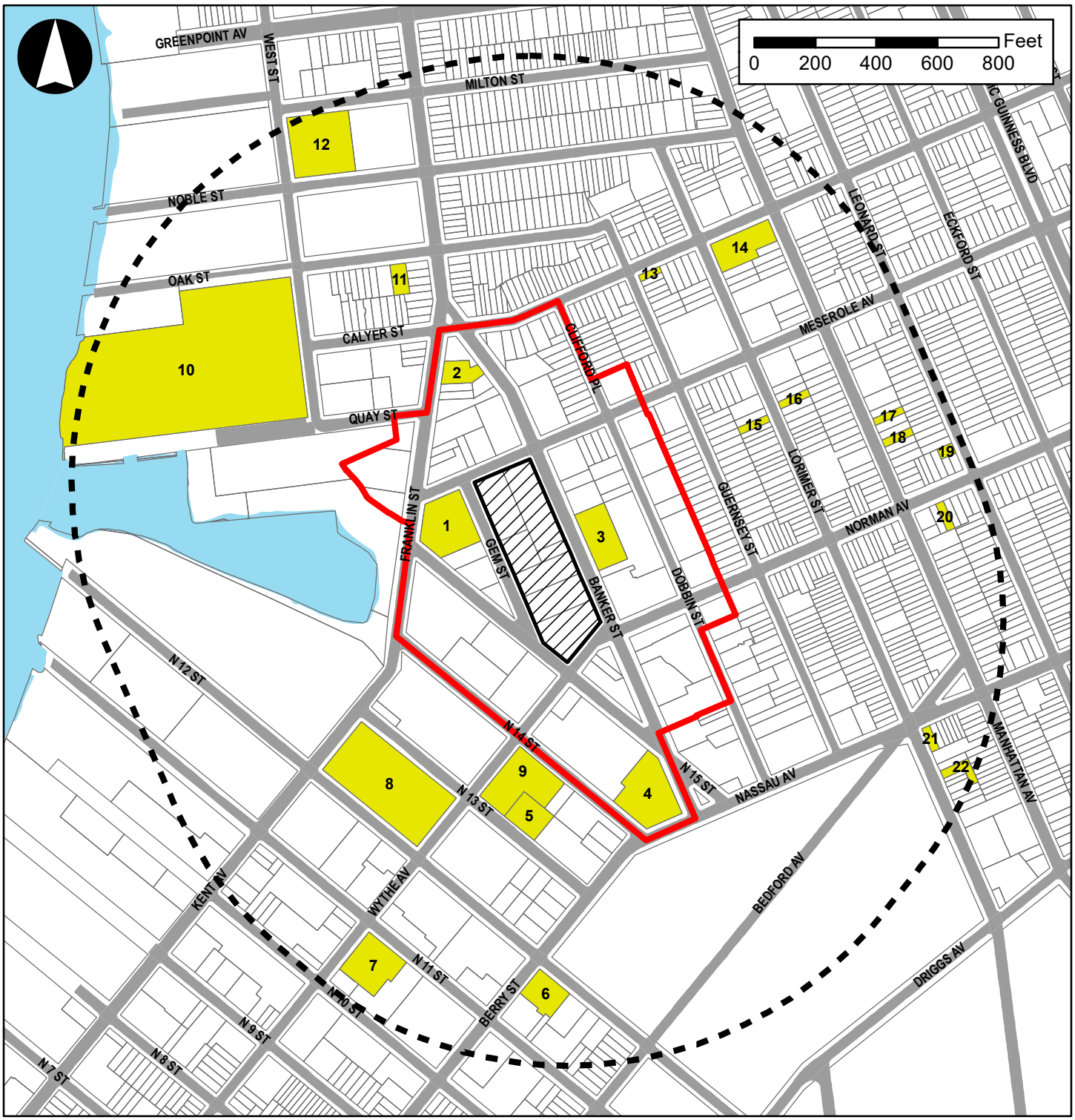
Based on existing and anticipated real estate market trends, the existing structures and site conditions, and uses allowed by existing zoning, it is expected that those vacated buildings on Lots 1, 6, 21, 25, and 50 would be re-occupied by a mix of eating/drinking/entertainment establishments, creative office and warehouse uses. In addition, the vacant building on Lot 19, which is the smallest lot on the block, is assumed to be re-occupied by restaurant use in the No-Action. Finally, Lot 125 currently accommodates parking and open storage. Prior to the Proposed Actions being proposed, the current owner of Lot 125 was pursuing a redevelopment of it with a new 3-story commercial building with distillery, office, dance studio and restaurant uses (which would have complied with existing zoning), and filed a building permit application for such a project. Due to the historical reference point, the No-Action scenario assumes that absent the Proposed Actions the current owner would pursue this project instead.

Overall, the No-Action condition for the Development Site is assumed to consist of a total of 169,485 gsf, comprised of approximately 35,225 gsf of restaurant/entertainment uses, 66,750 gsf of creative office space, 28,610 gsf of warehousing spaces, and 17,500 gsf of industrial space (distillery), as well as an estimated 21,400 gsf of accessory parking (107 spaces).

SECONDARY STUDY AREA

There are four known and anticipated developments that are in various stages of development and are expected to be completed and occupied in the secondary study area by 2024, which are shown in Figure 2-7 and summarized in Table 2-3, below. Together, these four projects will introduce one dwelling unit, 16,831 gsf of retail space, 155,521 gsf of general commercial/office space, 5,199 gsf of community facility space, 48,310 gsf of light manufacturing/industrial space, and approximately 71 parking spaces into the secondary study area.

For purposes of analyses provided in other chapters of this EIS, No-Action developments anticipated within a quarter-mile radius of the Development Site are also included in Table 2-3. As shown in Figure 2-7 and Table 2-3, including the four projects within the secondary study area, there are 22 projects in



Legend

- Primary Study Area (Development Site)
- Secondary Study Area (Parcels within a 400-Foot Radius of Development Site)
- Quarter-Mile Radius
- 1 — No-Action Developments (Refer to Table 2-3)

various stages of development within a quarter-mile radius of the primary study area. Combined, these 22 projects would introduce nearly 850 residential units, approximately 106,351 gsf of retail space, 517,163 gsf of office space, 155 hotel rooms, 46,000 gsf of other commercial uses, 144,526 gsf of community facility space, and 187,798 gsf of industrial space.

TABLE 2-3
No-Action Developments

Secondary Study Area (400-Feet)												
Map No.[1]	Project	Market-rate DUs	Affordable DUs	Retail (sf)	Commercial Office (sf)	Hotel Rooms	Gym/Health Club	Community Facility (sf)	Industrial (sf)	Parking Spaces	# of Floors	Build Year[2]
1	12 Franklin Street	-	-	16,831	109,521	-	-	-	23,547	36	7	2021
2	50 Franklin Street	-	-	-	-	-	-	5,199	7,968	35	5	2020
3	193 Banker Street	1	-	-	-	-	-	-	16,795	-	3	2018
4	1 Nassau Avenue	-	-	-	-	-	46,000	-	-	-	1	2019
	Subtotal	**1**	**-**	**16,831**	**109,521**	**-**	**46,000**	**5,199**	**48,310**	**71**		
Within a Quarter-Mile Radius												
5	103 North 13th Street	-	-	21,058	43,287	-	-	-	10,970	-	6	2020
6	150 North 12th Street	54	-	-	-	-	-	-	-	22	7	2018
7	77 Wythe Avenue	-	-	-	85,601	-	-	47,653	-	342	9	2021
8	25 Kent Avenue	-	-	37,347	278,754	-	-	-	70,722	275	8	2020
9	29-41 Wythe Avenue	-	-	-	-	-	-	86,340	57,796	324	8	2022
10	65 Private Drive	410	-	3,629	-	-	-	-	-	-	33	2021
	37 West Street	92	-	-	-	-	-	3,300	-	97	14	
	29 West Street	218	-	7,476	-	-	-	-	-	-	14	
11	84 Oak Street	6	-	-	-	-	-	-	-	-	3	2018
12	60-62 West Street	-	-	-	-	155	-	-	-	-	8	2020
13	140 Calyer Street	1	-	-	-	-	-	-	-	-	2	2018
14	805 Manhattan Avenue	29	-	15,360	-	-	-	-	-	-	4	2021
15	1025 Lorimer Street	3	-	-	-	-	-	-	-	-	3	2018
16	1030 Lorimer Street	3	-	-	-	-	-	-	-	-	4	2019
17	730 Manhattan Avenue	2	-	2,319	-	-	-	-	-	-	3	2019
18	720 Manhattan Avenue	4	-	-	-	-	-	-	-	-	4	2018
19	623 Leonard Street	2	-	-	-	-	-	-	-	-	4	2019
20	94 Norman Avenue	10	-	-	-	-	-	-	-	-	5	2018
21	66 Nassau Avenue	5	-	1,543	-	-	-	2,034	-	-	5	2018
22	888 Lorimer Street	5	-	788	-	-	-	-	-	-	6	2018
	Subtotal	**844**	**-**	**89,520**	**407,642**	**155**	**-**	**139,327**	**139,488**	**1,060**		

Notes:
[1]Refer to Figure 2-7.
Although the 25 Kent Avenue building has been completed, it is not yet fully occupied and is therefore included as a No-Build site for CEQR analysis purposes.
Sources: New York City Department of Buildings (DOB) Building Information System (BIS); Articles from *CityRealty, Curbed NY, FXCollaborative, The Real Deal, and YIMBY*.

As evidenced by recently completed and ongoing development projects within the secondary study area and ¼-mile surrounding area, the land use trend of the Williamsburg-Greenpoint neighborhoods is moving towards more conversions and new construction of hotels[5], retail, entertainment uses and mixed-use developments, although the neighborhood continues to contain a number of industrial spaces and jobs. Anticipated development under the No-Action scenario will support the future economic development and growth in the area.

[5] On December 20, 2018 the City Council adopted the M1 Hotel Text Amendment which modified the Zoning Resolution to require special permits for the construction of hotels in most high performance (M1) zoning districts. Most of the hotels in the study area and larger Greenpoint and Williamsburg that are located within M1 zoning district were constructed or under construction prior to the adoption of this zoning text amendment.

Zoning and Public Policy

No changes to zoning or public policy in the primary or secondary study areas are anticipated in the 2024 No-Action condition.

The Future with the Proposed Actions (With-Action Condition)

As described in detail in Chapter 1, "Project Description," the Proposed Actions include a zoning map amendment and a LSGD special permit, affecting the Development Site (Block 2615, Lots 1, 6, 19, 21, 25, 50, and 125). This section describes the land use and zoning conditions that would result from the Proposed Actions by 2024 and evaluates the potential for the Proposed Actions to result in significant adverse impacts related to land use and zoning and their consistency with the applicable public policies described earlier in this chapter.

Land Use

PRIMARY STUDY AREA

The Proposed Actions would result in changes to some land uses in the primary study area, as compared to the No-Action condition.

Table 2-4 provides a summary of the RWCDS for the Development Site compared to the No-Action condition. The Proposed Development represents the RWCDS for the Development Site. As indicated in the table, the total development expected to occur in the primary study area under the With-Action condition would consist of approximately 654,300 gsf, including 530,600 gsf of commercial office and retail space, and 109,300 gsf of light industrial/manufacturing space, as well as 150 parking spaces (14,400 gsf). The incremental (net) change between the No-Action and With-Action conditions that would result from the Proposed Actions would be 460,850 gsf of commercial office and retail space, 91,800 gsf of industrial space, and 43 parking spaces (-7,000 gsf), as well as a net reduction of approximately 35,225 gsf of restaurant space and 28,610 gsf of warehousing space.

TABLE 2-4
2024 RWCDS No-Action and With-Action Land Uses – Primary Study Area (Development Site)

Use	No-Action Scenario [gsf]	With-Action Scenario [gsf]	Increment
Industrial/Manufacturing[1]	17,500	109,300	**+ 91,800 gsf**
Office	66,750	496,800	**+ 430,050 gsf**
Local Retail	--	33,800	**+ 33,800 gsf**
Restaurant/Entertainment	35,225	--	**- 35,225 gsf**
Warehousing	28,610	--	**- 28,610 gsf**
Parking	107 spaces (21,400 gsf)	150 spaces (14,400 gsf)	**+ 43 spaces (-7,000 gsf)**
Employment[2]	**No-Action Scenario**	**With-Action Scenario**	**Increment**
Workers	422	2,232	**+ 1,810**

Notes:
[1] Industrial/Manufacturing uses include some accessory administrative spaces.
[2] Employee numbers for Acme Smoked Fish provided by the Applicant (approximately 169 current employees, and 140 on-site employees with the Proposed Action, including office staff). For other No-Action and proposed uses, estimates based on one employee per 1,000 sf for industrial/warehousing, one employee per 250 sf of office space, three employees per 1,000 sf of retail space; and one worker per 50 parking spaces.

SECONDARY STUDY AREA

The Proposed Actions are not expected to affect land use patterns in the secondary study area. The consistency of the Proposed Actions with secondary study area land uses is discussed in the "Assessment" section, below.

Zoning

PRIMARY STUDY AREA

Proposed Actions

The Proposed Development requires the approval of the following zoning actions:

- A zoning map amendment to rezone the Development Site (Block 2615, Lots 1, 6, 19, 21, 25, 50, and 125) from M3-1 to M1-5.
- A Large-Scale General Development (LSGD) special permit pursuant to Section 74-743(a)(2) of the Zoning Resolution to allow the Proposed Development to penetrate the required sky exposure plane and the required initial setback distance, allowing a building height in excess of the maximum allowable height under ZR Section 43-43.

SECONDARY STUDY AREA

The Proposed Actions are site-specific and would not alter zoning designations within the secondary study area surrounding the primary study area. The consistency of the Proposed Actions with zoning in the secondary study area is discussed in the "Assessment" section, below.

Public Policy

No changes to the applicable primary or secondary study area public policies are proposed as part of the Proposed Actions. The consistency of the Proposed Actions with the applicable primary and secondary study area public policies are discussed in the "Assessment" section, below.

Assessment

LAND USE

Primary Study Area

The Proposed Actions would not result in significant adverse impacts to land use in the primary study area. The Proposed Actions would not directly displace existing land uses in such a way as to adversely affect surrounding land uses. The Proposed Development would preserve and support an existing industrial use (Acme Smoked Fish) and retain light industrial/manufacturing uses in an existing IBZ, as well as provide increased walk-to-work opportunities within Brooklyn CD 1, contribute to an increase in density of appropriate land uses in an area of the City well-served by existing infrastructure and public transportation, strengthen the economic base of the Greenpoint neighborhood, enhance the value of land and buildings, contribute to a diverse mix of business uses and employment in the neighborhood, and protect the City's tax revenues.

Greenpoint and the adjacent north side of Williamsburg have both experienced significant residential growth since the 2005 Greenpoint-Williamsburg Rezoning. While new office buildings, such as the recently completed 380,000 sf 25 Kent development, and conversions have been completed in the surrounding area in recent years (including offices for Vice Magazine and a photo studio for Amazon), the amount of

existing office space in the surrounding area has not expanded sufficiently to meet the needs of the area's growing residential population. Therefore, the introduction of approximately 496,800 gsf of commercial office space facilitated by the Proposed Actions would provide new office space within an area of the City experiencing substantial growth in residential population. The Proposed Actions would allow a new building containing space for commercial office, retail, and light industrial/manufacturing uses to be constructed on the Development Site in an area where there is strong demand for these particular uses.

The Proposed Development would also introduce local retail which would activate street frontage and enhance the pedestrian experience. The proposed retail uses are expected to serve the needs of the surrounding area.

Furthermore, the introduction of additional commercial office space in Greenpoint would address increasing borough-wide demand for new commercial office space. As discussed in Chapter 3, "Socioeconomic Conditions," small and mid-sized companies, which make up most of Brooklyn's business growth, as well as startups, are driving the market and are seeking to locate in areas in close proximity to, or otherwise accessibly by, their workforces, near public transportation, and growing residential markets. The success of the Greenpoint and Williamsburg residential markets is contributing to the growth of the commercial market in the area and the associated demand for additional office space. The commercial office space facilitated by the Proposed Actions would contribute toward addressing an increase in demand from the media, technology, and creative industries for new commercial space in Downtown Brooklyn, DUMBO, and Williamsburg. Particularly in light of the Covid-19 health crisis, the commercial component of the Proposed Development would meet the need for new, modern, office space offering the latest in health and wellness measures (e.g., state-of the art infrastructure and HVAC systems). It would also allow companies to locate in the Greenpoint/Williamsburg neighborhood, closer to a large pool of available workforce that currently lives there, thereby allowing many office workers to walk or bike to work.

Secondary Study Area

The Proposed Actions would not result in significant adverse impacts to land use in the secondary study area. The secondary study area, which includes a diverse assortment of existing land uses, would not undergo any land use changes as a result of the Proposed Actions; the proposed changes would be limited to the Development Site and would introduce commercial and industrial uses complementary to existing secondary study area land uses. A majority of the properties located within the secondary study area have not been the subject of new development, with the exception of the four No-Action developments (summarized in Table 2-3) expected to be completed and occupied in the secondary study area by 2024. Together, these four projects will introduce one dwelling unit, 16,831 gsf of retail space, 155,521 gsf of general commercial/office space, 5,199 gsf of community facility space, 48,310 gsf of light manufacturing/industrial space, and approximately 71 parking spaces into the secondary study area. As exemplified by these No-Action developments, the new commercial office and local retail uses provided in the Proposed Development would be consistent with, and complementary to, the under construction and planned land uses in the secondary study area. In addition, the Proposed Actions would allow the retention and expansion of an existing industrial use (Acme Smoked Fish) that would be consistent with the industrial character of the secondary study area. As such, the Proposed Actions would support existing land use trends in the secondary study area and would not introduce any new land uses that would be incompatible with their surroundings.

ZONING

Primary Study Area

According to the criteria set forth in Section 410 in Chapter 4 of the *CEQR Technical Manual*, the Proposed Actions would not result in significant adverse impacts on zoning. As shown in Table 2-5, in the With-Action condition, the primary study area would be rezoned from M3-1 to M1-5. The proposed zoning map amendment would increase the maximum allowable density in the primary study area to 6.5 FAR for community facility uses and 5.0 FAR for commercial and manufacturing uses. The proposed zoning designation would also increase the performance standards for industrial uses in the primary study area. While the proposed M1-5 zoning designation would facilitate a development at a higher density than what is currently allowed in the primary study area's M3-1 zoning district, the higher density zoning designation and associated increased density would be appropriate, given the primary study area's proximity to existing infrastructure and public transportation, as well as the proposed zoning designation's consistency with M1 districts mapped adjacent to the boundaries of the primary study area.

The Proposed Development would conform with the primary study area's proposed M1-5 zoning designation, as modified by the remaining Proposed Action – one LSGD special permit. The LSGD special permit, pursuant to Section 74-743(a)(2) of the ZR, would permit the bulk of the Proposed Development on Gem Street and Meserole Avenue without regard to applicable height and setback regulations by allowing a front wall height of 104 feet, in excess of the 85 feet maximum, and penetration of the 2.7:1 sky exposure plane in the M1-5 zoning district, contrary to ZR Section 43-43.

The proposed zoning changes would be consistent with recently approved zoning actions in the surrounding Greenpoint-Williamsburg IBZ, including the approval of three IBIA special permit applications: 25 Kent Avenue, 12 Franklin Street, and 103 North 13th Street. Each of these projects sought special permits to incentivize the construction of new mixed-use commercial and manufacturing buildings that allocate a portion of their floor area to certain light industrial uses, allowing additional floor area devoted to certain types of commercial and light industrial uses. As proposed, the combined industrial/commercial Proposed Development is in keeping with the City's policy of encouraging the retention and expansion of industrial businesses, especially in IBZ areas, by providing increased commercial floor area and acknowledging the site constraints that such developments may entail. For these reasons, the Proposed Actions would have no significant adverse impact on zoning in the primary study area.

TABLE 2-5
Comparison of Existing and Proposed Zoning – Primary Study Area (Development Site)

	Existing Zoning [M3-1]	**Proposed Zoning [M1-5]**
Use Groups	6-18	4-17*
Maximum Permitted FAR		
Residential	Not Permitted	Not Permitted
Community Facility	Not Permitted	6.5
Commercial	2.0	5.0
Manufacturing	2.0	5.0

Source: *Zoning Resolution of the City of New York.*
*In M1 zoning districts, Use Group 5 is only allowed by CPC special permit.

Secondary Study Area

The Proposed Actions would allow for the as-of-right development of a mix of commercial and industrial uses in the primary study area. Although the Proposed Actions would increase the allowable density in the primary study area, this increase would be appropriate given the context of zoning in the secondary

study area. The Proposed Development's zoning designation and proposed uses would be compatible to the existing and permitted uses in the neighboring secondary study area zoning districts. Consistent with most existing and planned development in the secondary study area, the Proposed Development would occupy the entire site and create continuous street walls. Existing buildings with comparable density are located just outside of the secondary study area at 26 West Street (4.8 FAR) and at 25 Kent Avenue (4.8 FAR). In addition, as discussed above, there are two other approved IBIAs located outside of the boundaries of the secondary study area, 103 North 13th Street and 12 Franklin Avenue, which will facilitate two new mixed-use commercial and industrial developments with FARs up to 4.8. The Proposed Actions would therefore be compatible with zoning in the surrounding secondary study area and would not affect the relationship between the primary and secondary study areas. Therefore, it is not expected that the Proposed Actions would result in any significant adverse impacts on zoning in the secondary study area.

PUBLIC POLICY

OneNYC

OneNYC was released in April 2015. As discussed above, *OneNYC* is a comprehensive plan for a sustainable and resilient city for all New Yorkers that speaks to the profound social, economic, and environmental challenges faced. The Proposed Actions are consistent with the City's sustainability goals, including those outlined in *OneNYC*. Notably, the Proposed Actions would support the plan's land use goals of redeveloping underutilized sites near the waterfront with active uses; focusing development in areas that are served by mass transit; increasing walk-to-work opportunities; creating jobs in proximity to established and/or growing residential neighborhoods; and fostering walkable retail destinations. The Proposed Actions are expected to facilitate the development an approximately 109,300 gsf new state-of-the-art factory for Acme Smoked Fish. As such, the Proposed Actions would help to foster the expansion and retention of an existing industrial business, which would be consistent with the *OneNYC* goal of fostering an environment in which small businesses can succeed. Overall, the Proposed Actions would be supportive of the applicable goals and objectives of *OneNYC*.

New York Works

New York Works was released in June 2017. As discussed above, the plan attempts to identify initiatives that will spur 100,000 new jobs for middle-class households that will lead to careers in several sectors. The Proposed Actions and resulting Proposed Development are consistent with this policy and would help to support the mission of *New York Works*. The Proposed Development would be located in a transit accessible area and would create approximately 496,800 gsf of commercial office uses, 109,300 gsf of industrial uses, and approximately 33,800 gsf of local retail uses. This mix of commercial office, industrial, and local retail uses would create much needed flexible work space in the Greenpoint neighborhood of Brooklyn, an emerging market, and allow for a wider range of commercial and light industrial uses. The Proposed Actions would facilitate a new development that increases the supply of commercial space, which is essential to expanding opportunity and increasing the number of middle income, outer borough, private sector jobs.

Waterfront Revitalization Program

As noted above, the primary study area falls within the City's designated coastal zone (refer to Figure 2-6). Therefore, the Proposed Actions must be assessed for their consistency with the policies of the WRP. The WRP includes policies designed to maximize the benefits derived from economic development, environmental preservation, and public use of the waterfront, while minimizing the conflicts among those objectives. The WRP Consistency Assessment Form (CAF) (see Appendix A) lists the WRP policies and indicates whether the Proposed Actions would promote or hinder each policy, or if that policy would not

be applicable. This section provides additional information for the policies that have been checked "promote" or "hinder" in the WRP CAF. The WRP CAF prepared for the Proposed Development (WRP # 18-047) has been reviewed by DCP's Waterfront and Open Space Division.

Policy 1: Support and facilitate commercial and residential development in areas well-suited to such development.

Policy 1.1: Encourage commercial and residential development in appropriate Coastal Zone areas.

Compliance Statement: As mentioned above, the Development Site is not a waterfront site, as the site is located one block to the east of the waterfront. The Development Site is located in an appropriate location for commercial and industrial development as it is located in Greenpoint, a neighborhood with commercial and industrial land uses that is well-served by existing infrastructure and public transportation. The Development Site is not located within a Significant Maritime and Industrial Area (SMIA), Special Natural Waterfront Area (SNWA), Priority Maritime Activity Zone (PMAZ), Recognized Ecological Complex (REC), or West Shore Ecologically Sensitive Maritime and Industrial Area (ESMIA), as defined in the WRP, and is therefore not located in a special area that may be inappropriate for the development of new commercial and industrial uses.

Under the With-Action condition, the Proposed Development would introduce a new two-building complex containing approximately 654,300 gsf of total space, including approximately 530,600 gsf of commercial office and retail uses and approximately 109,300 gsf of industrial space for a new Acme Smoked Fish processing facility, as well as 14,400 gsf of accessory parking. The 33,800 gsf of retail space occupying portions of the ground floor would have small footprints and would be occupied by local retail uses. Approximately 150 off-street parking spaces would be located on the building's ground floor, which would be accessed via an entrance on Gem Street.

The Proposed Development would be constructed in accordance with the proposed M1-5 zoning and the requested LSGD special permit. For these reasons, the Proposed Actions would promote Policy 1.1 of the WRP and would facilitate commercial development in an area well-suited to such development.

Policy 1.3: Encourage redevelopment in the Coastal Zone where public facilities and infrastructure are adequate or will be developed.

Compliance Statement: The Proposed Actions would encourage new development in an area served by existing public facilities and infrastructure. As described throughout this EIS, the density of the Proposed Development is compatible with the capacity of surrounding roadways, mass transit, infrastructure, and essential community services. It is anticipated that the mix of commercial and industrial uses and the scale of the Proposed Development would not overburden the surrounding area and the Development Site would continue to be adequately served by the existing local infrastructure. Overall, the Proposed Actions would encourage redevelopment in an area adequately served by existing public facilities and infrastructure and would promote Policy 1.3 of the WRP.

Policy 1.5: Integrate consideration of climate change and sea level rise into the planning and design of waterfront residential and commercial development, pursuant to WRP Policy 6.2.

Compliance Statement: As detailed in the Compliance Statement for WRP Policy 6.2 below, the Proposed Development would integrate consideration of the latest projections of climate change and sea level rise in New York City into the Proposed Development's planning and design. All new vulnerable, critical, or

potentially hazardous features would be protected through flood damage reduction measures. As such, the Proposed Actions are consistent with this WRP policy.

Policy 5: Protect and improve water quality in the New York City coastal area.

Policy 5.1: Manage direct or indirect discharges to waterbodies.

Compliance Statement: As discussed in Chapter 9, "Water and Sewer Infrastructure," the Development Site is served by existing combined sewers under the surrounding streets, and therefore no direct discharges to water bodies would occur as a result of the Proposed Actions. Furthermore, the Proposed Development would introduce new street trees in accordance with zoning requirements, as well as approximately 21,403 sf (0.49 acres) of partially covered landscaped open space areas of which approximately 12,880 sf would be open to the sky. As part of these open space areas would be comprised of softscape/permeable surfaces, these features would increase the amount of pervious surface coverage at the Development Site, resulting in greater stormwater absorption and reducing stormwater runoff into nearby waterbodies. For these reasons, the Proposed Actions would promote Policy 5.1 of the WRP.

Policy 5.5: Protect and improve water quality through cost-effective grey-infrastructure and in-water ecological strategies.

Compliance Statement: As discussed in Chapter 9, "Water and Sewer Infrastructure," the Proposed Development would not result in significant adverse impacts to the City's water supply or wastewater and stormwater conveyance and treatment infrastructure. On-site stormwater best management practices (BMPs) would be required as part of the New York City Department of Environmental Protection (DEP) site connection approval process for the Proposed Development to bring the proposed building into compliance with the required stormwater release rate. As such, the Proposed Actions would promote Policy 5.5 of the WRP.

Policy 6: Minimize loss of life, structures, infrastructure, and natural resources caused by flooding and erosion, and increase resilience to future conditions created by climate change.

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

Compliance Statement: As the proposed Development Site is located within a 100-year flood zone, the Proposed Development has been designed to incorporate flood mitigation measures with wet and dry floodproofing strategies. Entrances to the building, the parking garage, and all loading docks would be wet flood-proofed, as these areas would be one foot higher than the elevation of the adjacent sidewalk. The ground floor of the building would be raised out of the flood zone to an elevation of approximately 12 feet. The electric rooms, gas meter room, water meter room, and pump room would all be dry flood-proofed to ensure that these areas are protected from floodwaters. Finally, the Proposed Development's elevator and mechanical equipment would be located in several locations, including portions of the fifth floor roof's bulkhead areas and the bulkheads located above the ninth floor terrace. The flood mitigation measures incorporated into the design of the Proposed Development would also help to protect against rising sea levels. The Proposed Development would be designed and constructed in accordance with all applicable City and State flooding and erosion regulations, including New York City Administrative Code, Title 28, Section 104.9 ("Coastal Zones and Water-Sensitive Inland Zones").

Policy 6.2: Integrate consideration of the latest New York City projections of climate change and sea level rise (as published in the New York City Panel on Climate Change 2015 Report, Chapter 2: Sea Level Rise and Coastal Storms) into the planning and design of projects in the City's Coastal Zone.

Compliance Statement: The Proposed Project has considered potential risks related to coastal flooding to features specific to the project, including, but not limited to, the location of critical electrical, gas, heating, ventilation, and air conditioning (HVAC), mechanical, and plumbing/sprinkler systems.

In June 2013, the Federal Emergency Management Agency (FEMA) issued Preliminary Work Maps for New York City to show coastal flood hazard data. Subsequently, the City made immediate accommodations to zoning regulations and upgrades to the New York City Building Code so that new construction would be built to these higher standards. In January 2015, FEMA issued Revised Preliminary Flood Insurance Rate Maps (FIRMs) for New York City, which are considered the best available flood hazard data, replacing the FEMA Preliminary Work Maps. As shown in Figure 2-8, the Development Site is located within the currently applicable 100-year and 500-year flood zones.

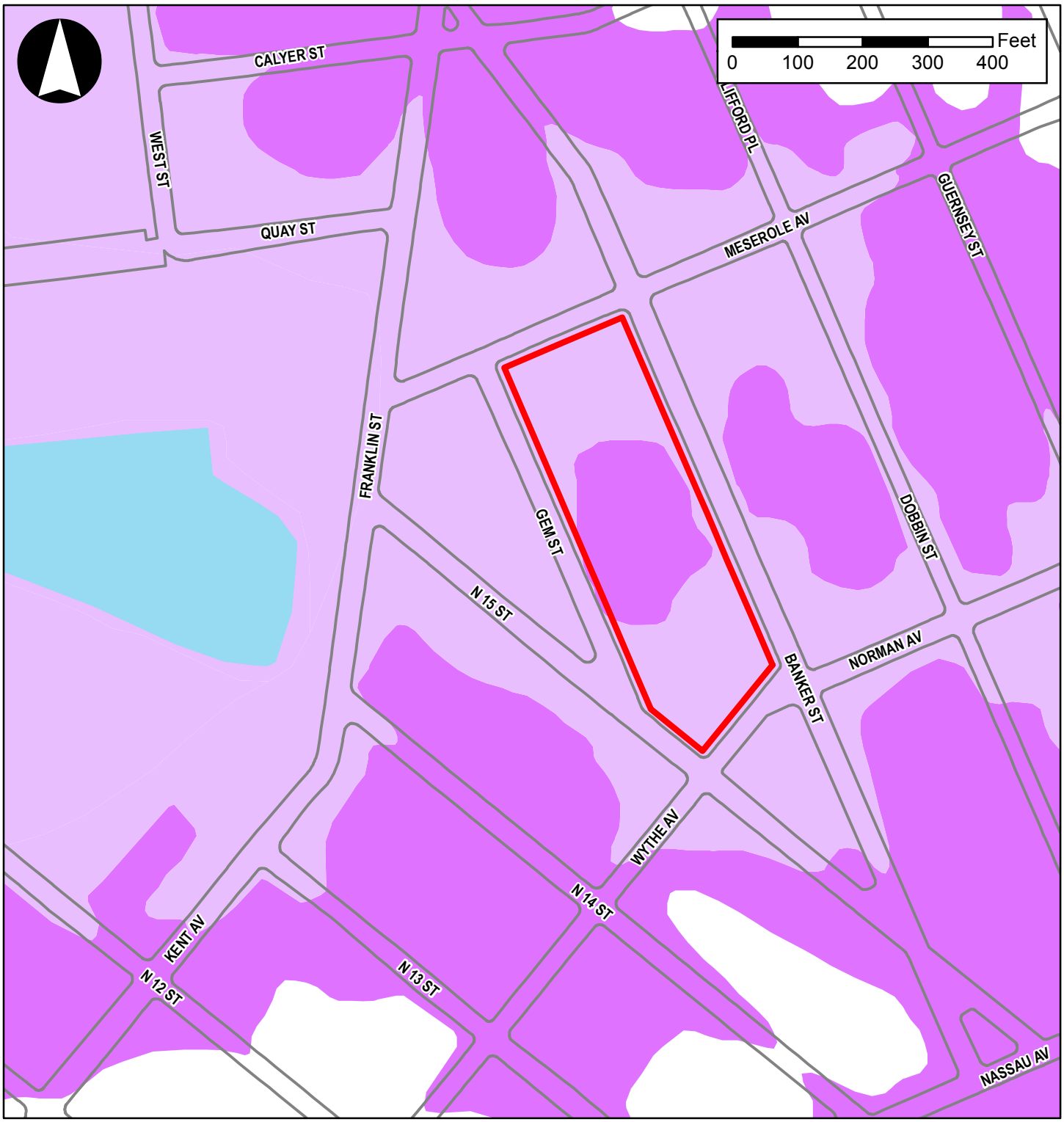
The NPCC additionally recommends assessing the impacts of projected sea level rise on the lifespan of projects. While the NPCC developed a series of maps incorporating projections for sea level rise with FEMA's 2013 Preliminary Work Maps, because of limitations in the accuracy of flood projections, the NPCC recommends that these maps not be used to judge site-specific risks. However, in general, the NPCC estimates that in the New York City area, sea level will rise up to a high estimate of 10 inches by the 2020s, and up to a high estimate of 30 inches by the 2050s. As such, areas not currently within the currently applicable 100-year and 500-year flood zones will be in the future, based on the NPCC projections. Furthermore, the NPCC projects that the frequency, extent, and height of 100-year and 500-year floods will increase by the 2050s.

The Flood Elevation Worksheet was prepared for the Proposed Development, and is provided in Appendix A. As shown in the graph on page 2-24, the elevation of the lowest commercial floor, industrial floor, ground floor parking level, and ground floor service closets are above the elevation of the current one percent annual chance floodplain, but could fall below the elevation of the one percent annual chance floodplain by the 2020s (see Figure 2-9) and 2050s (see Figure 2-10). Furthermore, floors two through nine would be located well above the current and future one percent annual chance floodplain under high-projections. Similarly, mechanical equipment for heating and cooling is expected to be located on the rooftop within two different bulkheads, which are at an elevation of approximately 74 feet and 172.5 feet (NAVD88), respectively. If these areas were to fall below the elevation of the current one percent annual chance floodplain, future flooding could result in a loss of building services, damage to property and cars, loss of inventory, or potentially increased flood insurance costs. However, the NPCC recommends that these projections not be used to judge site-specific risks and they are subject to change.

Coastal floodplains are influenced by astronomic tide and meteorological forces and not by fluvial flooding, and as such are not affected by the placement of obstructions within the floodplain. As shown in the graph on page 2-25, no building features are expected to be below the elevation of the Mean Higher High Water at any point over the building's lifespan and it is unlikely the Development Site would be affected by tidal flooding.

As the Development Site is located within a 100-year flood zone, the Proposed Development has been designed to incorporate flood mitigation measures with wet and dry flood-proofing strategies, as is mandated by the New York City Building Code requirements for flood resistant construction. As shown in the building plans, the entrances to the building, the parking garage, and all loading docks would be wet

FEMA Flood Hazard Zones

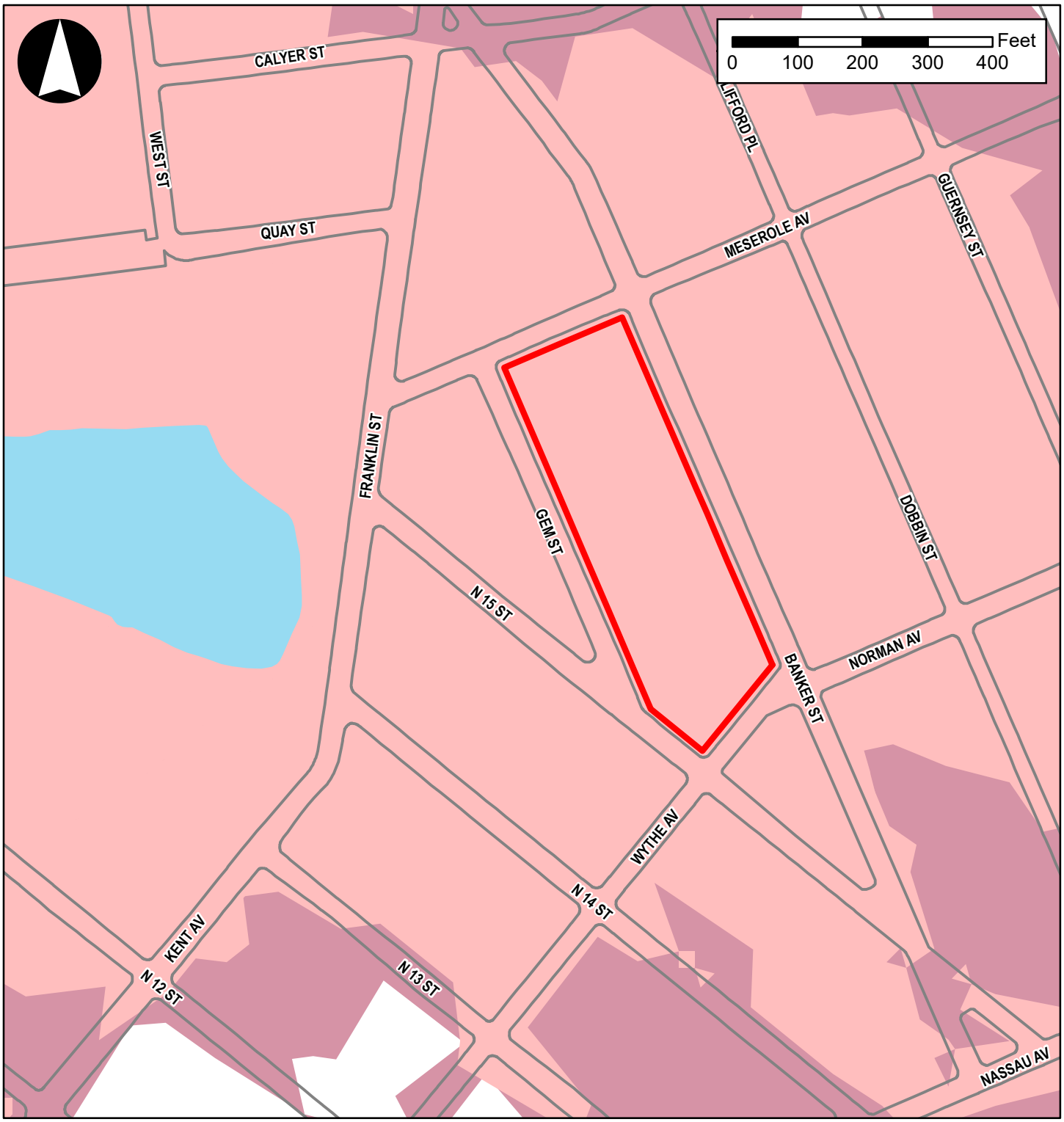


Legend

- Primary Study Area (Development Site)
- Pavement Edge
- East River
- 2015 100-Year Floodplain
- 2015 500-Year Floodplain

Note: This map is for advisory purposes only. It uses the most current data available and is deemed accurate, but is not guaranteed.
Source: United States Federal Emergency Management Agency. NYC Revised Preliminary FIRMs: January, 2015.

2020s Flood Zone Projections

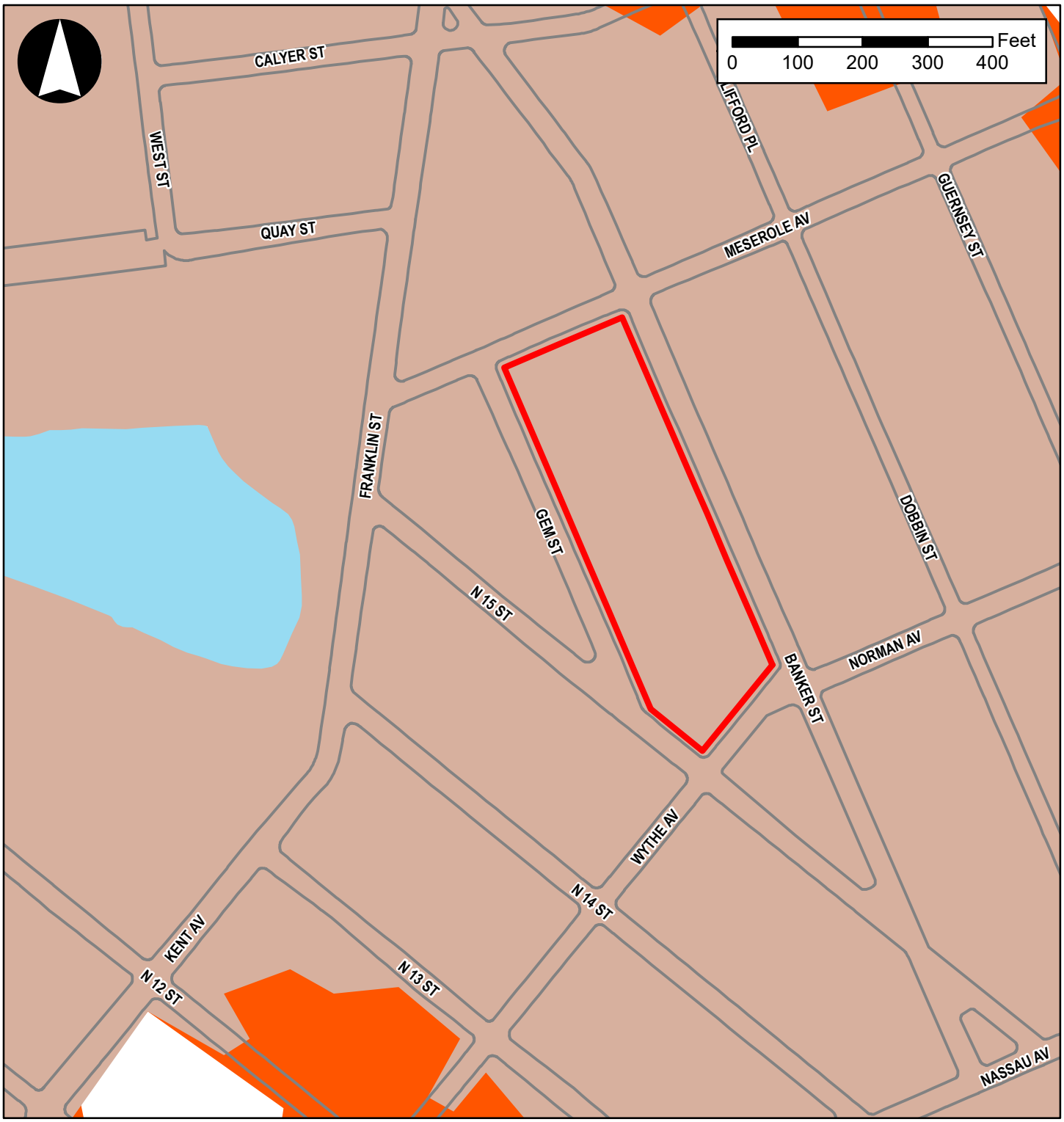


Legend

- Primary Study Area (Development Site)
- Pavement Edge
- East River
- 2020s 100-Year Floodplain
- 2020s 500-Year Floodplain

Note: This map is for advisory purposes only. It uses the most current data available and is deemed accurate, but is not guaranteed.
Source: United States Federal Emergency Management Agency. NYC Revised Preliminary FIRMs: January, 2015.

2050s Flood Zone Projections



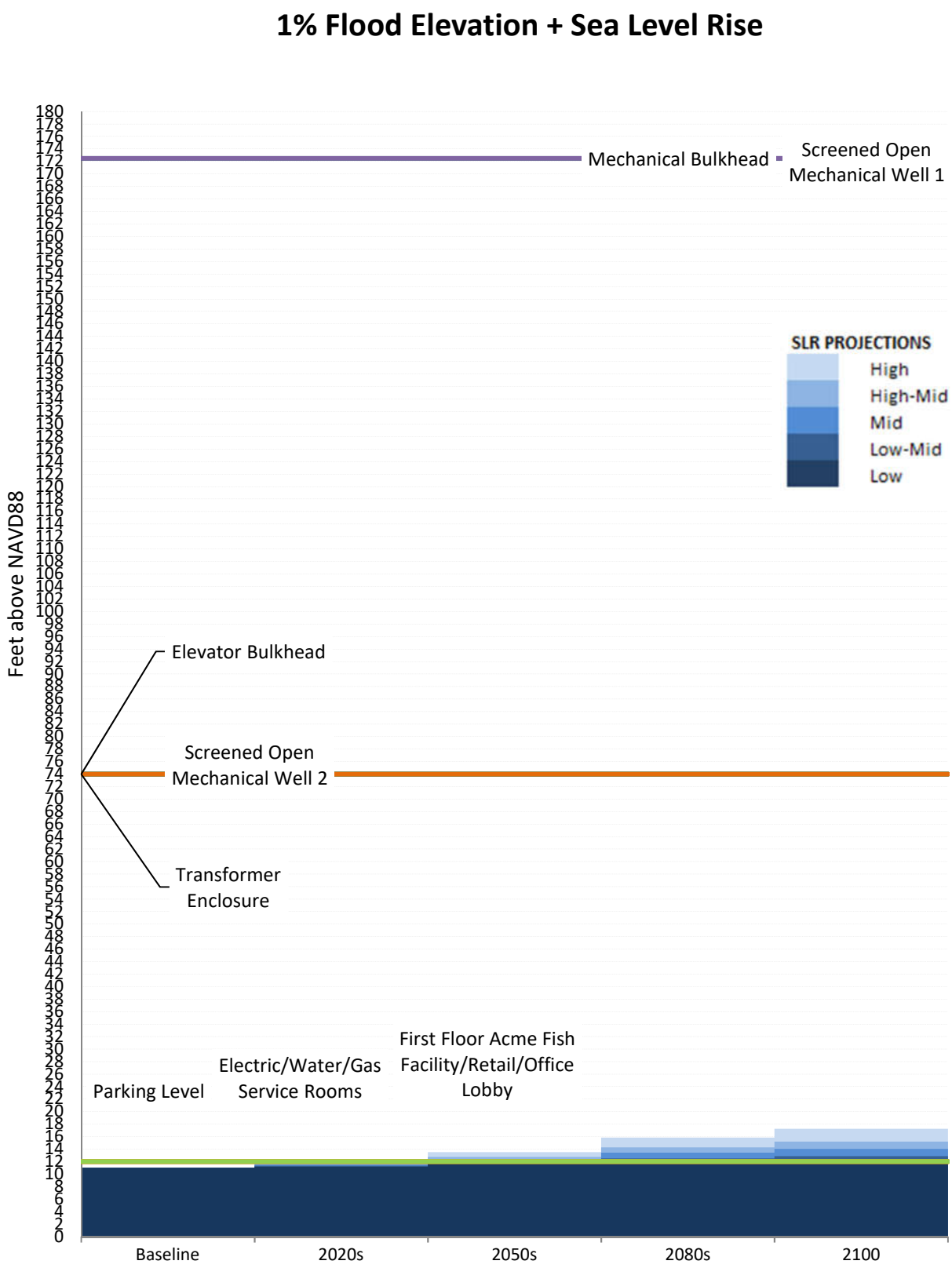
Legend

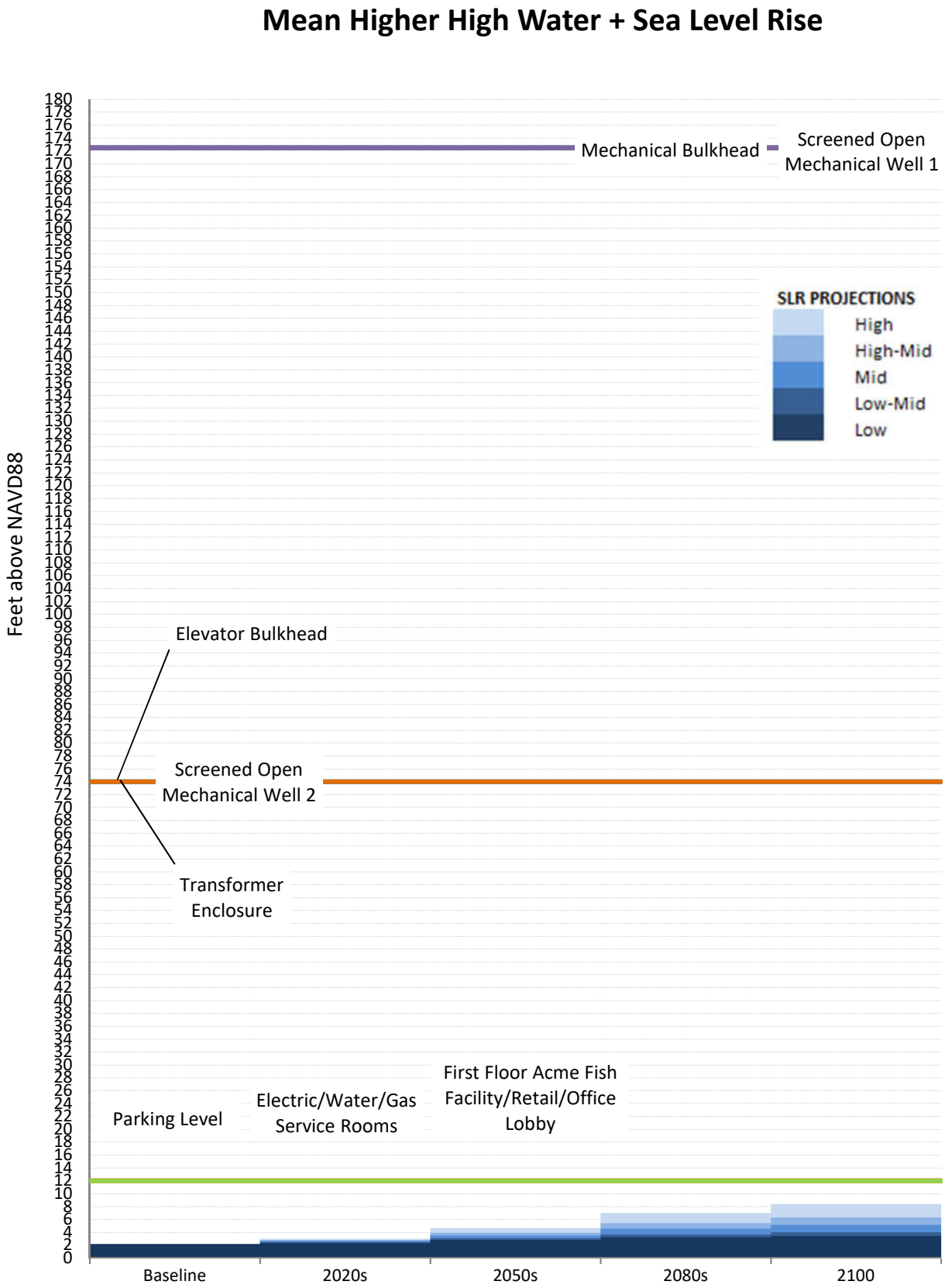
- Primary Study Area (Development Site)
- Pavement Edge
- East River
- 2050s 100-Year Floodplain
- 2050s 500-Year Floodplain

Note: This map is for advisory purposes only. It uses the most current data available and is deemed accurate, but is not guaranteed.
Source: United States Federal Emergency Management Agency. NYC Revised Preliminary FIRMs: January, 2015.

flood-proofed. The ground floor of the building would be raised one foot above the existing flood zone. The electric rooms, gas meter room, water meter room, and pump room would all be above the floodplain to ensure that these areas are protected from floodwaters. Finally, the Proposed Development's elevator and mechanical equipment would be located in several locations, including portions of the fifth floor roof's bulkhead areas and the bulkheads located above the ninth floor terrace. The flood mitigation measures incorporated into the design of the Proposed Development would also help to protect against rising sea levels. The Proposed Development would be designed and constructed in accordance with all applicable City and State flooding and erosion regulations, including New York City Administrative Code, Title 28, Section 104.9 ("Coastal Zones and Water-Sensitive Inland Zones").

As such, the Proposed Development would advance Policy 6.2 and there would be no significant adverse impacts associated with the Development Site's location in the 100-year floodplain. All new vulnerable, critical, or potentially hazardous features would be protected through flood damage reduction measures or future adaptive actions. Therefore, the Proposed Actions would be consistent with New York City policies regarding adaptation to climate change.


1% Flood Elevation + Sea Level Rise
Feet above NAVD88
Mechanical Bulkhead
Screened Open Mechanical Well 1
SLR PROJECTIONS
High
High-Mid
Mid
Low-Mid
Low
Elevator Bulkhead
Screened Open Mechanical Well 2
Transformer Enclosure
Parking Level
Electric/Water/Gas Service Rooms
First Floor Acme Fish Facility/Retail/Office Lobby
Baseline
2020s
2050s
2080s
2100


Mean Higher High Water + Sea Level Rise
Feet above NAVD88
180
178
176
174
172
170
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166
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154
152
150
148
146
144
142
140
138
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40
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12
10
8
6
4
2
0
Mechanical Bulkhead
Screened Open Mechanical Well 1
SLR PROJECTIONS
High
High-Mid
Mid
Low-Mid
Low
Elevator Bulkhead
Screened Open Mechanical Well 2
Transformer Enclosure
First Floor Acme Fish Facility/Retail/Office Lobby
Electric/Water/Gas Service Rooms
Parking Level
Baseline
2020s
2050s
2080s
2100