SoHo/NoHo Neighborhood Plan
Draft Scope of Work
for an Environmental Impact Statement
CEQR No. 21DCP059M
ULURP Nos. Pending
October 28, 2020

A. INTRODUCTION

This Draft Scope of Work (Draft Scope) outlines the technical areas to be analyzed in the preparation of the Environmental Impact Statement (EIS) for the SoHo/NoHo Neighborhood Plan. The applicant, the New York City Department of City Planning (DCP), is proposing zoning map amendments and zoning text amendments (the Proposed Actions) to implement land use and zoning changes to better reflect existing neighborhood conditions, strengthen mixed-use, create opportunities for housing, including affordable housing, and celebrate the architectural character and creative legacy of the SoHo and NoHo neighborhoods. This proposal has been prepared in response to neighborhood-wide planning challenges brought by changing economic and demographic trends and informed by local and citywide stakeholders during the Envision SoHo/NoHo process, a public engagement initiative undertaken in 2019 by the Manhattan Borough President, the Council Member for City Council District 1, and DCP.

The Proposed Actions would affect an approximately 56-block, 146-acre area (the Project Area) of the SoHo and NoHo neighborhoods of Manhattan, Community District 2. The Project Area is generally bounded by Astor Place and Houston Street to the north; Bowery, Lafayette Street, and Baxter Street to the east; Canal Street to the south, and Sixth Avenue, West Broadway, and Broadway to the west (see **Figures 1 and 2**). The Reasonable Worst-Case Development Scenario (RWCDS) for the Proposed Actions identifies 27 projected development sites. On the projected development sites, the Proposed Actions are expected to result in a net increase of approximately 1,683 projected dwelling units (DUs) (including 328 to 494 affordable units); 57,473 gross square feet (gsf) (47,754 zoning square feet [zsf]) of projected retail space (local and destination retail and supermarket space); and 19,598 gsf (17,050 zsf) of projected community facility space. The RWCDS also identifies 57 potential development sites, which are considered less likely to be developed by the analysis year. On the potential sites, the Proposed Actions may result in a net increase of approximately 1,548 DUs, including 293 to 446 permanently affordable units; 50,744 gsf (44,142 zsf) of potential destination retail space; and 15,465 gsf (13,453 zsf) of potential community facility space. Development on some of these sites, due to their location within historic districts, would be subject to future review and approval by the New York City Landmarks Preservation Commission (LPC).

The Proposed Actions seek to accomplish the following land use and zoning objectives:



Aerial

SOHO/NOHO NEIGHBORHOOD PLAN

Figure 1



Project Location

SOHO/NOHO NEIGHBORHOOD PLAN

Figure 2

- Promote economic recovery, resiliency, and growth by allowing a wider range of commercial, community facility, and light industrial uses.
- Expand housing opportunities by allowing residential use and requiring permanently affordable housing to ensure that the neighborhoods support income diversity and further the City's equity and Fair Housing goals.
- Establish appropriate densities and building forms that ensure new development harmonizes with neighborhood context and scale.
- Promote the preservation of historic resources and adaptive reuse of existing buildings by allowing for the conversion of existing buildings.
- Celebrate SoHo/NoHo's evolving role in the City's creative economy by continuing to accommodate and expanding live-work uses and supporting creative, arts, and cultural uses.

This Draft Scope provides a description of the Proposed Actions, the projected and potential development that is reasonably expected to result from those actions, and the technical areas and approaches to be used for analysis in preparing the EIS. The New York City Planning Commission (CPC) has determined that an EIS for the Proposed Actions will be prepared in conformance with City Environmental Quality Review (CEQR) guidelines, with DCP acting on behalf of CPC as the lead agency. The environmental analyses in the EIS will assume a development period of 10 years for the RWCDS for the Proposed Actions (i.e., an analysis year of 2031). DCP will conduct a coordinated review of the Proposed Actions with involved and interested agencies, including the LPC, Board of Standards and Appeals (BSA), Department of Housing Preservation and Development (HPD), Department of Sanitation (DSNY), Department of Parks and Recreation (NYCParks), Department of Transportation (DOT), Department of Environmental Protection (DEP), Department of Cultural Affairs (DCLA), and the New York City School Construction Authority (SCA).

B. REQUIRED APPROVALS AND REVIEW PROCEDURES

The Proposed Actions include discretionary approvals that are subject to review under the Uniform Land Use Review Procedure (ULURP), Section 200 of the City Charter, and CEQR process. The discretionary actions include:

- ***Zoning map amendments.*** The Proposed Actions would replace all or portions of existing M1-5A and M1-5B districts with medium to high density commercial and/or mixed-use districts, and establish a new Special SoHo NoHo Mixed-Use District in the Project Area.
- ***Zoning text amendments.*** The Proposed Actions include amendments to the text of New York City's Zoning Resolution (ZR) to establish regulations for the proposed Special SoHo NoHo Mixed-Use District and to amend Appendix F of the ZR to apply the Mandatory Inclusionary Housing (MIH) program to the Special District.

CITY ENVIRONMENTAL QUALITY REVIEW AND SCOPING

The Proposed Actions are classified as Type I, as defined under 6 NYCRR 617.4 and 43 RCNY 6-15, subject to environmental review in accordance with CEQR guidelines. An Environmental Assessment Statement (EAS) that examined the Proposed Actions was completed on October 28, 2020 and a Positive Declaration, issued on October 28, 2020, established that the Proposed Actions may have a significant adverse impact on the environment, thus warranting the preparation of an EIS.

The CEQR scoping process is intended to focus the EIS on those issues that are most pertinent to the Proposed Actions. The process allows elected and appointed officials, governmental officials, other agencies, and the public a voice in framing the scope of the EIS. The scoping document sets forth the analyses and methodologies that will be utilized to prepare the EIS. During the period for public scoping, as explained below, those interested in reviewing the Draft Scope may do so and provide comments to the lead agency. The public, interested agencies, Manhattan Community Board 2, and elected officials are invited to comment on the Draft Scope, either in writing or verbally, at a public scoping meeting.

In accordance with SEQRA and CEQR, this Draft Scope has been distributed for public review. A public scoping meeting has been scheduled for December 3, 2020 at 2:00 PM, and the period for submitting written comments will remain open until Friday, December 18, 2020. In support of the City's efforts to contain the spread of COVID-19, DCP will hold the public scoping meeting remotely. Instructions on how to view and participate, as well as materials relating to the meeting, will be available at the DCP Scoping Documents webpage (https://www1.nyc.gov/site/planning/applicants/scopingdocuments.page) and NYC Engage website (https://www1.nyc.gov/site/nycengage/index.page) in advance of the meeting.

Comments received during the Draft Scope's public meeting and written comments received up to 15 days after the meeting (until December 18, 2020), will be considered and incorporated as appropriate into the Final Scope of Work (Final Scope). The lead agency will oversee preparation of the Final Scope, which will incorporate all relevant comments made on the Draft Scope and revise the extent or methodologies of the studies, as appropriate, in response to comments made during the public comment period. The Draft EIS (DEIS) will then be prepared in accordance with the Final Scope. Once the lead agency is satisfied that the DEIS is complete, the document will be made available for public review and comment. A public hearing will be held on the DEIS in conjunction with the CPC hearing on the land use applications to afford all interested parties the opportunity to submit oral and written comments. The record will remain open for 10 days after the public hearing to allow additional written comments on the DEIS. At the close of the public review period, a Final EIS (FEIS) will be prepared that will respond to all substantive comments made on the DEIS, along with any revisions to the technical analyses necessary to respond to those comments. The FEIS will then be used by the decision-makers to evaluate CEQR findings, which address any significant adverse impacts resulting from the Proposed Actions, and identify feasible mitigation measures, in deciding whether to approve the requested discretionary actions, with or without modifications.

Determination of consistency with the Waterfront Revitalization Program *(WRP).* Portions of the Project Area are within the Coastal Zone and will require review by the CPC, in its capacity as the City Coastal Commission (CCC), to determine if they are consistent with the relevant WRP policies.

C. BACKGROUND TO THE PROPOSED ACTIONS

PROJECT AREA HISTORY

THE EARLY HISTORY OF SOHO AND NOHO

The SoHo and NoHo neighborhoods were used as farm and pastureland up to and through the 17th century, including the significant establishment of Manhattan's first free black settlement in SoHo on land granted by the Dutch West India Company. Portions of the Project Area were developed with manufacturing use as early as the late 18th century and the subsequent draining of ponds in

the area and transformation of Broadway into a paved thoroughfare initiated the transformation of the area into a residential district. In the mid-19th century, SoHo and NoHo emerged as an important manufacturing and commercial district, with Broadway again leading the way as new marquee retail stores, entertainment venues, and hotels were constructed. The neighborhoods' resulting iconic cast-iron loft buildings contain large, contiguous floor plates, high ceilings and sturdy floors that can accommodate a wide range of business activities. This flexibility made them particularly conducive to adaptive reuse in later years.

A DIVERSIFYING ECONOMY AND A GROWING RESIDENTIAL PRESENCE

Starting in the 1860s, fueled by the construction boom of non-residential buildings in Lower Manhattan and an industrializing economy, SoHo shifted from a commercial and entertainment destination to a critical manufacturing and wholesale center for textiles and garments. Other types of industrial businesses—such as wood and metal production, hardware, and paper wholesale—were also present. Post-World War II, influenced by changes within the manufacturing industry, such as transportation and spatial needs, the number of manufacturing and related businesses in SoHo and NoHo contracted significantly in the 1950s through the 1970s. The dramatic decline of manufacturing, wholesale, and related uses in SoHo and NoHo left many former industrial lofts empty, presenting an opportunity for versatile, artist live-work spaces.

In 1971, the City amended SoHo/NoHo's basic M1-5 industrial zoning that had been in place since 1961. The 1971 rezoning sought to address the decline in manufacturing uses and recognize the growing presence of an artist community that was drawn to the area's vacant manufacturing loft buildings. Joint Living-Work Quarters for Artists (JLWQA) was created as a new manufacturing use within zoning Use Group 17 to allow certain artists and their households to live and practice their craft in such spaces. At first, the use was permitted only in SoHo, within two newly created zoning districts, M1-5A and M1-5B. In 1976, the M1-5B zoning was expanded to NoHo. The M1-5A and M1-5B zoning required that spaces used as JLWQA must be occupied by an artist certified by DCLA. DCLA established criteria for artist certification based on the limited definition of "artist" in the New York State Multiple Dwelling Law (MDL).

In the following decades, as SoHo and NoHo gained increasing popularity as a loft district, residential occupancies not associated with artists and arts production became more prevalent. Elsewhere in Manhattan, as industrial sectors relocated to buildings and areas that could accommodate modern production and distribution, loft buildings were increasingly occupied with residential uses. In addition to residential use restrictions, M1-5A and M1-5B zoning further imposed controls on certain commercial uses, introduced in 1976 with the intent to ensure that the larger buildings and prime ground floor space be reserved for industrial purposes and to restrict large entertainment establishments.

In the early 1980s, the City and State introduced zoning and legislative changes to regulate the conversion of non-residential loft buildings after recognizing a growing trend of illegal residential loft conversions. The MDL was amended by the enactment of Article 7C (also known as the "Loft Law"), which enabled the creation of Interim Multiple Dwellings (IMDs), i.e., a temporary legal status conferred upon commercial or manufacturing buildings occupied by three or more families with the ultimate expectation that such buildings be upgraded as permanent housing, and established the New York City Loft Board to regulate such conversions to residential use. Article 7C provided that residential conversions were only permitted in areas where zoning allowed residential use as-of-right, which effectively excluded IMDs in SoHo and NoHo. In 1987, Article 7C was amended to allow IMDs in zoning districts where residential use was not permitted as-of-

right, opening the doors for non-artist residents in SoHo and NoHo to seek Loft Law coverage. Subsequent Loft Law amendments extended filing windows and eligibility for coverage.

Recognizing that artists' occupations and circumstances could change and many residents did not qualify for artist certification, the City later granted amnesties for non-artist residents in SoHo/NoHo JLWQAs, noting that these units could be legalized as JLWQA and occupied by non-artists. In addition, familial successions of JLWQA by non-artists, sales and leasing of units to non-artists, as well as Use Group 2 residential conversions and new construction via zoning variances and special permits contributed to SoHo/NoHo's shift from a limited artist community to a broader residential demographic with people engaged in a variety of professions. With a population approaching 8,000 according to the 2010 US Census, SoHo/NoHo has a much more significant residential presence than typical manufacturing districts across the City.

Traditional manufacturing and industrial uses have diminished in SoHo/NoHo as these uses have in most other areas of the City due to broader macroeconomic changes. Despite the area's manufacturing zoning, DCP fieldwork conducted between 2015 and 2016 found that there were only about 20 industrial/semi-industrial businesses in operation in the neighborhoods at that time, half of which were semi-industrial or new types of "maker" uses that function in relation to a retail space or office setting (e.g., lighting design, sound recording studio, or 3D printing). According to the Quarterly census of Employment Wages in 2017, only about five percent of total jobs in SoHo/NoHo were in industrial sector businesses such as manufacturing, wholesale, and construction. In contrast, the neighborhood's non-industrial employment base was sizable and exhibited consistent trends of growth, totaling over 50,000 private-sector jobs in the same period. Office-based sectors, including professional and technical services, information, finance and insurance, and management of companies accounted for 30 percent of total jobs in the Project Area. Retail trade constituted 21 percent of the jobs in SoHo/NoHo and contributed an estimated $170 million in sales tax to New York City and State each year, reflective of the neighborhoods' position as the second highest-grossing retail market in New York City.

Driven by storefront demand and zoning that does not permit most ground floor uses beyond industrial or heavy commercial establishments, the area sees an extraordinarily high volume of applications for special permits and variances to locate or legalize retail uses. Based on DCP's survey of land uses, retail and other commercial uses (e.g., eating and drinking establishments, commercial art galleries, banks, showrooms) occupy ground floor space in most of the Project Area's buildings, with some multi-level stores concentrated along the Broadway corridor. Beyond the ground floor, retail and related uses make up 18 percent of total built floor area in existing buildings. Office uses, which are distributed in commercial and mixed-use buildings throughout SoHo/NoHo, make up a full third of total built floor area.

While the COVID-19 pandemic has impacted office occupancy and activity, retail, tourism and visitations, SoHo/NoHo's central location, transit accessibility, historic architecture, and retail ecosystem is such that office, retail, accommodation and food services and other non-industrial sectors are expected to remain core economic assets in the long term.

DEMOGRAPHICS

Approximately 7,800 residents live in SoHo/NoHo, according to the 2010 census. Neighborhood residents own or rent units that fall into three general categories: (1) JLWQA—which is considered a manufacturing use in zoning and requires the presence of an artist certified by the DCLA; (2) Loft Buildings, such IMDs and former IMDs that have been fully legalized under the State Loft Law (also known as Article 7C of the New York State Multiple Dwelling Law); and (3)

converted or newly constructed residential units approved by CPC special permits or BSA variances. Some residents in the Project Area live in older residential buildings such as tenements that pre-dated the manufacturing zoning. While the exact number is difficult to estimate, the share of certified artist residents in the Project Area today is likely small. The number of artist certifications issued by DCLA has declined significantly in recent decades: since 2015, fewer than 10 certifications were issued annually.

According to the 2010 US Census, the share of the population identified as white non-Hispanic in the Project Area was 77.5 percent, compared to 48 percent in Manhattan. According to the 2013–2017 American Community Survey, SoHo/NoHo residents had high education attainment (over 80 percent at and over the age of 25 had a bachelor's degree or higher); the median household income for SoHo/NoHo was $144,508, compared to $79,781 for Manhattan overall. The neighborhood is characterized by high home-ownership rates: roughly 40 percent of the area's housing units are owner-occupied, nearly twice as high as the Manhattan average. The vast majority of owner-occupied units are valued at over $1 million and almost half of rental units are priced above $2,000 per month.

COMMUNITY ENGAGEMENT AND INTERAGENCY PARTICIPATION

ENVISION SOHO/NOHO

The impetus for the SoHo/NoHo planning process began in 2015 with a joint letter to DCP from the Manhattan Borough President and the local City Council Member noting, among other matters, the high volume of site-specific land use actions (e.g., special permits and zoning variances) being processed for the neighborhoods, outdated zoning, and the lack of a holistic planning strategy. The letter called for the creation of a new planning framework informed by "a robust public neighborhood process" to strengthen the varied retail character of the area, promote a diversity of uses and employment base, recognize the arts and creative foundation of the neighborhoods, and encourage the development and preservation of affordable housing. The letter also identified three key issues to be examined: 1) the utility and functionality of the JLWQA use category vis-à-vis trends in today's creative sector; 2) retail regulations including size restrictions and the clarity, predictability, and enforceability of rules, and; 3) a potential zoning structure that contributes to the creation or preservation of affordable housing.

DCP, working in concert with the Manhattan Borough President and local City Council Member, began a series of technical studies that set a baseline for the community planning process to follow. The studies' findings provided specific data confirming the mismatch between existing zoning, longstanding perceptions of the nature of the SoHo and NoHo neighborhoods, and actual land use realities. In January 2019, DCP, alongside local elected officials, initiated the six-month Envision SoHo/NoHo public engagement process to examine key land use and zoning issues in the two neighborhoods, share with the public the results of the technical analysis, and seek community input to develop strategies to both honor SoHo/NoHo's history and ensure the continued vitality of the neighborhoods moving forward.

Guided by an 18-member stakeholder advisory group consisting of residents, business owners, elected officials, City agencies, and other advocacy organizations, the Envision SoHo/NoHo engagement process gathered local input on a range of topics, including housing, jobs, arts and culture, historic preservation, retail, quality of life, and creative industries. The process included over 40 meetings, including six public meetings/workshops, 17 advisory group meetings, and eight focus group meetings with various resident and stakeholder groups, as well as numerous other individual meetings with key stakeholders.

In November 2019, DCP, the Manhattan Borough President, and Council Member, in consultation with the stakeholder advisory group, issued a final report, *Envision SoHo/NoHo: A Summary of Findings and Recommendations* (the "Report"), which synthesized the comments and discussions from the public and stakeholder engagement process and provided a series of zoning, land use, and other recommendations and priorities. The report concluded that the current zoning and other land use controls fall short of producing the vision for a vibrant, mixed-use neighborhood. The report articulated the following broad goals to facilitate a successful, diverse, and inclusive community:

- Promote mixed-use in ways that respect and support neighborhood diversity and character;
- Foster the small business community of SoHo/NoHo by reducing regulatory barriers and providing supportive resources;
- Create housing and live-work opportunities on underused land in ways that respect and support neighborhood diversity and character;
- Maintain, enforce and strengthen existing protections for residents including renters and those in rent-regulated units;
- Support and promote the artist and maker communities while allowing people to live in SoHo/NoHo without artist certification;
- Preserve, promote, and create more spaces and uses for arts, maker uses, and cultural uses; and
- Improve quality of life of residents and workers in the SoHo/NoHo mixed-use environment.

Building on the Report's findings, DCP has established a planning framework which identifies a long-term vision for a balanced, coordinated approach to neighborhood planning. The framework includes areas prioritized for the preservation of neighborhood character, residential growth, and expansion of locations for job-generating commercial uses. The framework contains specific land use objectives to guide a vision for the future of SoHo and NoHo (discussed in greater detail in Sections E and F of this document), which recognizes the area's varied context and aims to meet multiple objectives. As the City proactively plans for the neighborhood's future, the framework also seeks to meet citywide goals of increasing housing production, including affordable housing, and directing growth to appropriate locations.

PROJECT AREA

The Proposed Actions would affect an approximately 56-block, 146-acre area of the SoHo and NoHo neighborhoods of Manhattan, Community District 2. The Project Area is generally bounded by Astor Place and Houston Street to the north; Bowery, Lafayette Street, and Baxter Street to the east; Canal Street to the south; and Sixth Avenue, West Broadway, and Broadway to the west. Canal Street is the gateway to the SoHo neighborhood and Houston Street is the major artery separating NoHo to the north from SoHo to the south. Broadway is the primary north-south corridor that extends the entire length of the Project Area. Other secondary corridors within the Project Area include West Broadway, Lafayette Street, and Broome Street. The Project Area consists of distinct subareas of commercial corridors and residential blocks, with differing building typologies and character. Most of the Project Area is located within the SoHo–Cast Iron Historic District and its extension, the NoHo Historic District and its extension, and the NoHo East Historic District.

HISTORIC DISTRICTS

Over 80 percent of the Project Area is within City-designated historic districts. Proposed development projects in SoHo/NoHo historic districts are subject to LPC review, inclusive of any alteration, reconstruction, demolition or new construction affecting buildings. Areas outside of historic districts (for example, in the southeast and southwest corners of SoHo, and certain areas along Bowery) are generally transitional areas, and possess a different built character compared to the cores of the SoHo and NoHo historic districts where cast-iron loft buildings are concentrated.

The SoHo–Cast Iron Historic District was designated by the LPC in 1973, and listed on the National Register of Historic Places and declared a National Historic Landmark in 1978. The district is bounded by Canal Street, Broadway, Howard Street, Crosby Street, East Houston Street, West Houston Street, and West Broadway, and consists of 26 blocks and contains approximately 500 individual buildings. The SoHo–Cast Iron Historic District Extension, designated in 2010, consists of approximately 135 properties located on the blocks immediately adjacent to the east and west sides of the SoHo–Cast Iron Historic District. The SoHo–Cast Iron Historic District and Extension are significant not only for their historic role in the commercial development of New York City, but also for the survival of the largest concentration of full and partial cast-iron façades anywhere in the world.[1]

The NoHo Historic District, designated by the LPC in 1999, consists mainly of the blocks east and west of Broadway between Houston Street and 9th Street, and is comprised of approximately 125 buildings. The NoHo Historic District represents the period of New York City's commercial history from the early 1850s to the 1910s, when the area prospered as one of the city's major retail and wholesale dry goods centers. Today, the historic district is distinguished by unifying streetscapes of marble, cast iron, limestone, brick, and terra-cotta façades.[2] The NoHo Historic District was further extended to the east in 2008.

In 2003, the LPC created the NoHo East Historic District, which is centered on Bleecker Street between the Bowery and Lafayette Street, and consists of 42 buildings constructed between the early 19th and the early 20th centuries. The district's low-scale, early-19th century houses on Bleecker Street and Elizabeth Street are reminders of the area's early residential history, while the larger store and loft buildings testify to the New York's growing importance as a hub of commercial activity. Today, this diversity of small dwellings, apartment buildings, factories, lofts, and stables represent an intact and unusual historic mixed-use neighborhood in lower Manhattan.[3]

A small portion of the Project Area is within the Sullivan-Thompson Historic District. Designated in 2016, the historic district is characterized by a diversity of row houses, tenements, commercial structures, and institutional buildings that developed in the early 19th century.[4]

[1] SoHo–Cast Iron Historic District Designation Report. NYC Landmarks Preservation Commission, August 14, 1973.

[2] NoHo Historic District Designation Report. NYC Landmarks Preservation Commission, June 29, 1999.

[3] NoHo East Historic District Designation Report. NYC Landmarks Preservation Commission, June 24, 2003.

[4] Sullivan-Thompson Historic District Designation Report. NYC Landmarks Preservation Commission, December 13, 2016.

NEIGHBORHOOD CONTEXT

The SoHo and NoHo neighborhoods are unique in that they are almost uniformly mixed-use. Unlike most other neighborhoods in Manhattan and elsewhere that have commercial uses concentrated on avenues and wide streets and predominantly residential use in the midblock and along side streets, SoHo and NoHo have various uses side-by-side—and, in many cases, above and below within individual buildings—on nearly every street. This pervasive mixed-use character contributes to the charm and vibrancy of SoHo and NoHo and presents unique conditions related to zoning, land use, and quality of life. Within SoHo and NoHo, built conditions, area context, and existing use patterns also combine to form several distinct subareas, as detailed below.

SoHo and NoHo Historic Cores

The historic centers and cores of SoHo and NoHo are generally located between West Broadway, Grand Street, Mercer Street, and Houston Street in SoHo, and East 4th Street, Bowery, Broadway, and Bleecker Street in NoHo. These core areas consist primarily of high lot coverage, well-preserved cast-iron. and/or masonry loft buildings constructed during the mid- to late-19th century and are typically five to seven stories tall with FARs generally ranging between 3.0 to 6.5, but with FARs on certain blocks reaching 10.0 or more. The areas' unique character is distinguished by this building stock which existed prior to the M1-5A/B zoning districts, resulting in building bulk and envelopes that are not wholly consistent with the existing zoning but are preserved through the area's LPC-designated historic districts. Much of the core areas' streets retain their original Belgium block pavers. These areas are overwhelmingly mixed-use residential and commercial. Smaller retail uses predominate on the ground floors while most of the upper floors of the loft buildings have been converted from their original light industrial uses to JLWQA, residential, and office uses. Bars and restaurants are interspersed across the Project Area, but are more prevalent along Lafayette Street, Great Jones Street, Bond Street, and West Broadway.

Commercial Corridors

While largely within historic districts and featuring cast-iron lofts, the Project Area's commercial corridors have distinct land use and built characters.

Broadway Corridor

Broadway is a major commercial corridor and a wide thoroughfare that runs through SoHo and NoHo. Buildings along Broadway, between Crosby and Mercer Street in SoHo, and along the adjacent Lafayette Street in NoHo, are generally taller and bulkier than those in the neighborhood cores: between six and 12 stories tall with FARs often exceeding 10.0— and consist of a mix of older loft buildings and more recent construction. The Broadway corridor contains the Project Area's largest floorplates, with a high concentration of commercial uses, particularly offices and destination retail. This corridor is an employment hub and has the lowest concentration of residential uses in the Project Area. The Broadway corridor north of 4th Street in NoHo has a relatively high concentration of institutional uses, interspersed with a number of low-rise industrial uses, and low-intensity uses such as vacant land and garages.

Bowery Corridor

The Bowery, a major commercial corridor and wide street, is located at the northeast corner of the Project Area in NoHo between Great Jones Street and Astor Place. The stretch north of 4th Street is characterized primarily by mixed residential and commercial buildings and a large institutional presence, with heights ranging from four to 16 stories and FARs generally between 5.0 and 9.0. In the area outside of the historic district along and south of East 4th Street, there are a number of under-built sites, including vacant land, low-rise tenements, and single-story semi-industrial or

formerly industrial buildings that have been converted to eating and drinking establishments. Ground-floor retail is more common south of East 4th Street than the area to the north.

Canal Street Corridor

The Project Area includes Canal Street, a thoroughfare and discount shopping corridor, characterized by a mix of tenements, federal-style rowhouses, historic cast-iron lofts, newly constructed residential buildings, low-rise retail stores, and some low-intensity semi-industrial businesses and parking garages. As potential development sites become increasingly scarce in the SoHo core, interest in the Canal Street Corridor has grown. New residential development projects are transforming the corridor by replacing low-intensity uses, such as single-story discount retail buildings and parking lots. 341 Canal and 419 Broadway, at six and eight stories respectively, are establishing Canal Street as a gateway to the neighborhood and serve as a transition between SoHo and the taller commercial buildings south of Canal.

SoHo East and SoHo West

The areas along the periphery of the Project Area, including the area generally south of Grand Street and east of Crosby Street and the area generally south of Watt Street and west of West Broadway, are mostly outside of the historic districts. These areas tend to contain a high concentration of low-intensity uses relative to other parts of the Project Area, including tenement-style buildings, low-rise industrial buildings, parking lots and garages, and one-story eating and drinking establishments. FARs in the area generally range from 3.0 to 6.5, though some of the older commercial office buildings can far exceed this range and can reach up to 12 stories.

Recently, a number of large hotels ranging between 16 and 26 stories have located in the area. While framed by major wide streets such as Sixth Avenue, Canal Street, Centre Street, and Lafayette Street, these areas are generally less residential and less built up than the other areas described above. SoHo West serves as a transitional area between the SoHo Historic Core and Hudson Square to the west. Hudson Square is known as a high-density mixed-use district characterized by high lot coverage large office buildings and new residential development. SoHo East, framed by multiple wide streets, is a transitional area where SoHo, Little Italy, Chinatown, and Lower Manhattan CBD intersect.

D. EXISTING ZONING

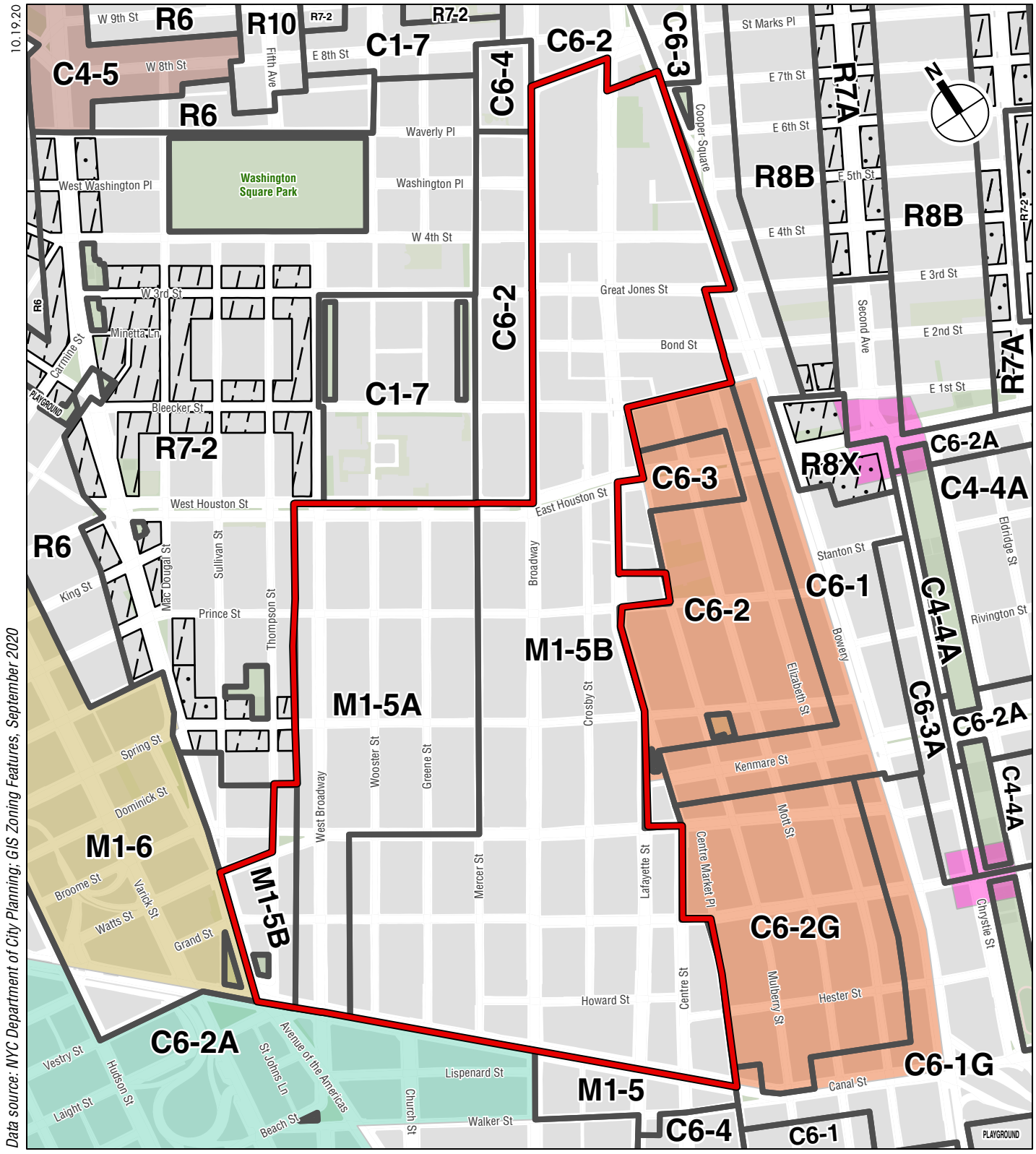
The Project Area consists of approximately 0.23 square miles, or approximately 146acres, in the south-central part of Manhattan Community District 2. The Project Area's 56 blocks are split between the neighborhoods of NoHo (11 blocks) and SoHo (45 blocks). Existing zoning is shown in **Figure 3**.

PROJECT AREA

M1-5A AND M1-5B

In general, M1-5A and M1-5B districts follow many of the same use and bulk regulations as the standard M1-5 manufacturing district, except for certain use restrictions that apply only to SoHo/NoHo. The M1-5A zoning district is mapped exclusively in SoHo, across approximately 12.5 blocks along and east of West Broadway between East Houston Street and Canal Street. The M1-5B zoning district covers most of the Project Area and is mapped across 11 blocks in NoHo and approximately 32 blocks in SoHo.

Both districts permit a maximum FAR of 5.0 for commercial and manufacturing uses and 6.5 FAR for community facility uses. The maximum height of a building at the street wall is six stories or



Existing Zoning

SOHO/NOHO NEIGHBORHOOD PLAN

Figure 3

85 feet, whichever is less, above which, an initial setback of 20 feet (narrow street) or 15 feet (wide street) is required. Maximum building height and setbacks are controlled by a sky exposure plane (2.7:1 on a narrow street or 5.6:1 on a wide street) which may be penetrated by a tower under certain conditions. Although new industrial buildings are -usually low-rise structures that fit within the sky exposure plane, commercial and community facility buildings can be constructed as towers. A 20-foot rear yard is required is most cases.

M1-5A and M1-5B districts allow a broad range of light manufacturing and commercial uses as of right. Residential use, which is not permitted as-of-right, consists of residential lofts legalized under the Loft Law and residential units that are pre-existing non-conforming uses or were permitted by special permit granted by the CPC or by variance granted by the BSA. JLWQA, a Use Group 17 manufacturing use that provides for combined live and work space for artists with certification from DCLA, is permitted through conversion of existing floor area, however, buildings containing JLWQA units may not be enlarged as-of-right. Eating and drinking establishments are only permitted subject to size restrictions and other limitations. Non-commercial clubs, theaters of 100 seats or more, entertainment uses such as banquet halls are not permitted as-of-right anywhere in the building. Retail establishments of 10,000 sf or more, as in all M1 districts, are only permitted by special permit.

The primary distinction between M1-5A and M1-5B districts relates to the location of certain uses within a building. In the M1-5B district, only uses listed in Use Groups 7, 9, 11, 16, 17A, 17B, 17C, or 17E, which exclude retail, eating and drinking, office, amusement and entertainment uses, are allowed below the floor level of the second story as-of-right. In the M1-5A district, the restrictions on the location of Use Groups 7, 9, 11, 16, 17A, 17B, 17C, or 17E do not apply to buildings occupying less than 3,600 sf of lot area. Similarly, in the M1-5B district in buildings occupying less than 3,600 sf of lot area, JLWQA may not be located below the floor level of the second story unless modified by the CPC. In the M1-5A district, but not M1-5B, the CPC may authorize a museum or non-commercial art gallery where it is not permitted as-of-right.

SURROUNDING AREA

M1-5

An M1-5 manufacturing district is mapped across a small, four-block area south of Canal Street between Walker Street, Broadway, and Baxter Street south of the Project Area. Similar to M1-5A and M1-5B districts, M1-5 districts permit a maximum FAR of 5.0 for commercial and manufacturing uses and 6.5 FAR for community facility uses. The maximum street wall height is six stories or 85 feet, whichever is less; maximum building height and setbacks are controlled by a sky exposure plane. Although new industrial buildings are usually low-rise structures that fit within the sky exposure plane, commercial and community facility buildings can be constructed as towers.

M1-5 districts permit a wide range of commercial and light industrial uses as of right, such as offices, repair shops, and wholesale service and storage facilities. Unlike the more restrictive M1-5A/M1-5B districts, most eating and drinking places and retail uses are allowed as of right. Certain community facilities, such as hospitals, are allowed in M1 districts only by special permit. Likewise, retail establishments of 10,000 square feet or more are only permitted by special permit. JLWQA are not an allowed use in M1-5 districts; other residential uses are not permitted unless paired with residence districts in a Special Mixed Use District.

M1-6 (SPECIAL HUDSON SQUARE DISTRICT)

An M1-6 manufacturing district is located to the west of the Project Area in the Hudson Square neighborhood. In general, many of the same use and building envelope rules of the M1-5 district apply, except that in M1-6 districts, the maximum permitted FAR is 10.0, or 12.0 with a public plaza bonus. The Special Hudson Square District, which is co-extensive with the M1-6 area, modifies some of the use and bulk controls of the underlying M1-6 district, encouraging new residential and retail development while also preserving larger commercial and light manufacturing buildings.

C6

Much of the Project Area is surrounded by C6 commercial districts to the south, east, and north, including C6-1, C6-1G, C6-2, C6-2G, C6-2A, C6-3, and C6-4. C6 districts permit a wide range of high-bulk commercial uses requiring a central -location, including large office buildings, large hotels, department stores, and entertainment facilities in high-rise mixed buildings. Most residential and community facility uses are also allowed as of right. Maximum commercial FAR in the surrounding areas ranges from 6.0 (C6-1, C6-2, C6-3) to 10.0 (C6-4). The C6-2A district is a contextual district with a contextual base and maximum building heights; all other C6 districts allow towers to penetrate a sky exposure plane and do not require a contextual base. C6-1G and C6-2G districts are mapped in Chinatown and Little Italy and have special rules for the conversion of non-residential space to residential use. Commercial districts have a corresponding residential district equivalent (e.g., R10 in C6-4), which regulates the bulk of residential or mixed-use buildings. The regulations of the Special Tribeca Mixed-Use District, mapped to the southwest of the Project Area within a C6-2A district, encourages mixed-use development, including residential and light industrial uses. The Special Little Italy District, mapped to the east of the Project Area within the underlying C6-1, C6-2, and C6-3 districts, has additional bulk controls designed to maintain the mixed-use character and mid-rise scale of the historic Little Italy neighborhood.

C1-7

A C1-7 commercial district is mapped in a portion of Greenwich Village north of Houston Street and west of Mercer Street. C1 districts are predominantly residential in character and are typically mapped along major thoroughfares in medium- and higher-density areas of the city. Typical retail and local service uses include grocery stores, dry cleaners, drug stores, restaurants, and local clothing stores that cater to the daily needs of the immediate neighborhood. The maximum commercial FAR is 2.0. The residential district equivalent for C1-7 is R8, which has a maximum FAR of 6.02 under height factor regulations. Quality Housing regulations with MIH allow for a maximum residential FAR of 7.2 and a maximum building height of 215 feet with a contextual base.

R7-2

An R7-2 district, which is mapped to the northeast of the project area, is a medium-density, non-contextual residential district generally characterized by mid-rise apartment buildings with a maximum FAR of 3.44 under height factor regulations. Quality Housing buildings with MIH allow for a maximum residential FAR of 4.6 and a maximum building height of 135 feet with a contextual base. C1-5 commercial overlays, mapped within the R7-2 district along streets that serve local retail needs, allow for a maximum commercial FAR of 2.0.

In addition to the above surrounding zoning districts, an approximately 2.5-block area southwest of the Project Area west of Thompson Street and north of Watt Street is zoned M1-5B. This area

is largely within the Sullivan-Thompson Historic District and has a much more residential character compared to the SoHo-Cast Iron Historic District to the east and the rest of the M1-5A and M1-5B districts. These blocks contain a high concentration of one- and two-family buildings and a limited commercial presence. FARs within the boundaries of the historic district generally range from 2.0 to 4.5. Outside of the historic district, parcels have recently been developed as residential buildings, including a 16-story apartment building and townhouses.

E. PURPOSE AND NEED FOR THE PROPOSED ACTIONS

SoHo and NoHo are dynamic mixed-use neighborhoods with an established residential population and strong office, retail and creative sectors that have evolved beyond what was contemplated by the M1-5A and M1-5B zoning. The Proposed Actions are necessary to address neighborhood and citywide planning needs, including supporting economic development and recovery and resiliency and strengthening mixed-use, increasing access to housing—including affordable housing, and establishing harmonious built form.

As discussed in more detail below, the Proposed Actions were informed by existing land use and economic conditions in the Project Area, the community-driven recommendations from Envision SoHo/NoHo, and the anticipated neighborhood and citywide needs in light of the housing crisis and the COVID-19 pandemic. The Proposed Actions are intended to strengthen SoHo and NoHo as dynamic mixed-use neighborhoods by addressing the area's significant challenges, while respecting its unique historic character and cultural legacy. By removing zoning barriers for businesses and economic recovery, allowing residential use and requiring affordable housing, and supporting arts and cultural activities in a manner that reflects the current needs of the City's artists and creative workforce, the Proposed Actions would ensure SoHo/NoHo's continued economic vitality, adaptability and resiliency, support citywide housing and equity goals, increase access to the neighborhoods' amenities and infrastructure of opportunities, and reinvigorate SoHo/NoHo's creative community. In addition, although not part of the proposed zoning actions described below, strategies outside of zoning would be developed to work in unison to support broader planning goals such as improving public realm management (e.g., retail delivery and loading management) and supporting the arts and creative industries in SoHo and NoHo).

REPLACE OUTDATED MANUFACTURING DISTRICTS WITH MIXED-USE REGULATIONS

In 1971, when the current zoning was adopted, the existing M1-5A and M1-5B zoning was intended to address a narrow issue: to provide a path for existing working artists to legalize their live-work occupancies while preserving space for shrinking manufacturing uses, including textile manufacturing and the wholesale sector. As described above, the Project Area's land use pattern and economic landscape have changed significantly since 1971, in keeping with citywide and regional macroeconomic trends and shift towards an office and service economy. However, SoHo/NoHo's manufacturing zoning and outmoded provisions continue to prioritize traditional light industrial and related uses that have largely relocated to other parts of the City, region and beyond, creating significant barriers and onerous burdens for property owners and businesses responding to market and industry changes. One such example of this mismatch between zoning and existing conditions is the restrictive zoning that generally only permits ground floors to be occupied by light manufacturing uses. Any other uses on ground floors, such as retail, food and beverage, and many other commercial uses, require a special permit that typically requires storefronts to be kept vacant—sometimes for over a year—while an attempt is made to identify an industrial tenant to occupy the space. Despite zoning that restricts retail, food and beverage

establishments, and many other commercial uses on the ground floors in most of the districts (excluding limited commercial spaces that pre-existed the current zoning), there has been a proliferation of such uses given SoHo/NoHo's central location, rich transit access, and adaptability of loft buildings. The shift away from manufacturing towards retail, office, creative production, and other commercial uses in SoHo/NoHo are consistent with economic conditions and land use trends around the Project Area.

Absent a zoning framework that accounts for these evolved market conditions, land use trends, and broader macroeconomic shifts, SoHo and NoHo have relied on individual land use applications and ad hoc approvals to keep up with a modernizing, post-industrial economy. For example, between 2000 and 2019, the City granted over 90 CPC special permits within the bounds of SoHo and NoHo, a portion of Community District 2, significantly more than the volume granted in the entire Community District 1 (21) or Community District 3 (51). The BSA has also granted numerous variances over the past decades in SoHo and NoHo. Many of these SoHo/NoHo special permits and variances were to allow retail and other commercial uses on the ground floors that are permitted as-of-right in these surrounding neighborhoods. The over-reliance on special permits and variances means that the regulatory burdens fall disproportionally on smaller businesses and property owners, who typically have fewer financial resources and less technical sophistication to navigate complex land use, environmental, and public review processes. The BSA has also granted numerous variances over the past decades in SoHo and NoHo. Many of these SoHo/NoHo special permits and variances were to allow retail and other commercial uses on the ground floors that are permitted as-of-right in these surrounding neighborhoods. The over-reliance on special permits and variances means that the regulatory burdens fall disproportionally on smaller businesses and property owners, who typically have fewer financial resources and less technical sophistication to navigate complex land use, environmental, and public review processes.

The obsolete and onerous zoning, including ground floor use restrictions and limitations on food and beverage uses, in the context of a rapidly evolving retail industry and the economic challenges and uncertainties brought by the COVID-19 pandemic, represents a significant barrier for businesses that wish to remain or locate in SoHo/NoHo, and contributes to high retail vacancies and the lack of storefront diversity. According to DCP's July 2020 study on retail activities across the five boroughs, while all major commercial corridors were found to have a higher share of inactive storefronts in light of the pandemic, SoHo and the Canal Street corridor were the only two areas with over 50 percent of the stores closed or vacant. The presence of outdated regulatory barriers will only serve to exacerbate challenges to recovery for two of New York City's most significant commercial areas.

The Proposed Actions would replace the outdated manufacturing zoning and rigid use restrictions with rational, appropriately flexible regulations that promote the mix of uses and support COVID-19 economic recovery, business adaptation, and long-term resiliency. The broad range of uses would support existing businesses in SoHo/NoHo as they continue to operate, expand, grow and evolve, while allowing a greater range of commercial, cultural, and civic activities within the existing highly adaptable loft buildings and new mixed-use developments. The Proposed Actions would also provide protection for the existing concentration of commercial and remaining light manufacturing uses in large loft buildings to balance non-residential and residential uses and ensure that SoHo/NoHo—especially the Broadway corridor where major employers cluster—continues to thrive as an employment hub and critical Class B office reservoir.

INTRODUCE RESIDENTIAL USE AND PROMOTE EQUITY IN HOUSING

While residential conversions have occurred through various means, including legalizations under the Loft Law, as well as use changes, and new construction allowed by CPC or BSA approvals, SoHo/NoHo's manufacturing zoning does not allow residential use (Use Group 2) as-of-right. For units that are approved by discretionary actions, a minimum unit size of 1,200 sf is required by the M1-5A and M1-5B zoning. These are significant hindrances to the equitable production of market rate and affordable housing in two high-opportunity neighborhoods close to transit and employment centers. The neighborhood's existing stock of affordable housing is limited and consists primarily of units subject to rent regulation by way of the New York State Loft Law. The limited number of residential conversions and ground-up developments in the past few decades have only provided market-rate units and made marginal contributions to the City's overall housing supply.

The Proposed Actions would allow residential use in conversions and new construction and implement the City's MIH program within SoHo/ NoHo. Residential use would be allowed across the Project Area where the potential for residential conversion and infill development exists; while areas on the periphery of SoHo/NoHo that are largely outside of historic districts present additional opportunities for new residential development and affordable housing production. In addition, the Proposed Actions would shift away from a narrow allowance for only JLWQA manufacturing use to residential use without any occupation-based restrictions, as is typical in the rest of the city. A wider set of live-work arrangements would also be accommodated through expanded home occupation provisions. This is consistent with citywide housing policies and would address broader concerns about housing equity in the context of Fair Housing laws.

SUPPORT ARTS AND CULTURE

The unique JLWQA regulations in the M1-5A and M1-5B districts, established in 1971, played a role in facilitating the transformation of SoHo/NoHo from a declining manufacturing district to a vibrant mixed-use area and arts and culture hub. Today, while certified-artist-occupied JLWQA largely remains the sole as-of-right quasi-residential use (Use Group 17D, not Use Group 2), only about 30 percent of all SoHo/NoHo homes are still listed as JLWQA use on certificates of occupancy. Moreover, these units have a wide array of occupancy and legal statuses as a result of five decades of property transaction history and a confluence of factors, including changes to the original artist residents' occupation, marital status and life arrangements, subsequent amnesties of non-artist residents, as well as enforcement challenges and administrative impracticalities of the JLWQA provisions. The complex interactions between JLWQA zoning regulations and the existing residential landscape have been cited by some local residents—including certified artists and others that lack or do not qualify for certification—as a source of significant uncertainty and potential risk in planning for their families' futures. More broadly, with the emergence of other dynamic and attractive artist communities across New York's five boroughs, artists do not make up a significant segment of the current 8,000 person residential population or market demand in SoHo/NoHo. Evidence of this trend is the steady decline of the number of artist certifications by the DCLA from hundreds annually in the '70s and '80s to one in recent years.

The Proposed Actions would continue to permit JLWQA use and live-work arrangements that already exist in the Project Area, and establish a voluntary option to transition JLWQA to regular residential use with conditions that more broadly benefit the arts and creative industries. This would facilitate the legalization of existing non-artist occupancy, broaden live-work to be more inclusive and reflective of modern needs, regularize residential market transactions to align with the rest of the City, and support the preservation and creation of affordable studio space and other

broadly accessible creative spaces that could continue SoHo/NoHo's cultural legacy into the future.

FACILITATE SUPERIOR URBAN DESIGN AND APPROPRIATE BUILDING FORM

The existing bulk regulations in M1-5A and M1-5B districts do not always facilitate building forms that relate harmoniously to the loft building context within and beyond the historic districts. In such instances, special permits and zoning variances are often needed to allow building forms appropriate for the historic district context and acceptable by the LPC. The Proposed Actions would establish bulk regulations that more appropriately respond to neighborhood context, provide flexibility to minimize the effects of new developments and enlargements on neighboring buildings and allow the LPC to shape the building form in a manner appropriate to the neighborhood and the immediate context without the need for separate land use actions.

F. DESCRIPTION OF THE PROPOSED ACTIONS

The Proposed Actions are intended to address the land use and zoning challenges raised during the SoHo/NoHo planning process with the objective of strengthening SoHo/NoHo as a vibrant mixed-use district and more inclusive community while striking an appropriate balance among residential and non-residential uses. The Proposed Actions would:

- Allow a wider range of non-residential uses and remove outdated ground floor commercial use restrictions, strengthen mixed-use, and support a healthy retail ecosystem;
- Allow residential use and apply MIH in a manner that addresses practical challenges presented by SoHo/NoHo's loft building typology and history;
- Establish appropriate bulk regulations to better reflect the existing character and enhance the historic built environment while also providing modern workable envelopes for new developments; and
- Support arts and culture and creative industries that serve the community and the public with use allowances and other appropriate provisions.

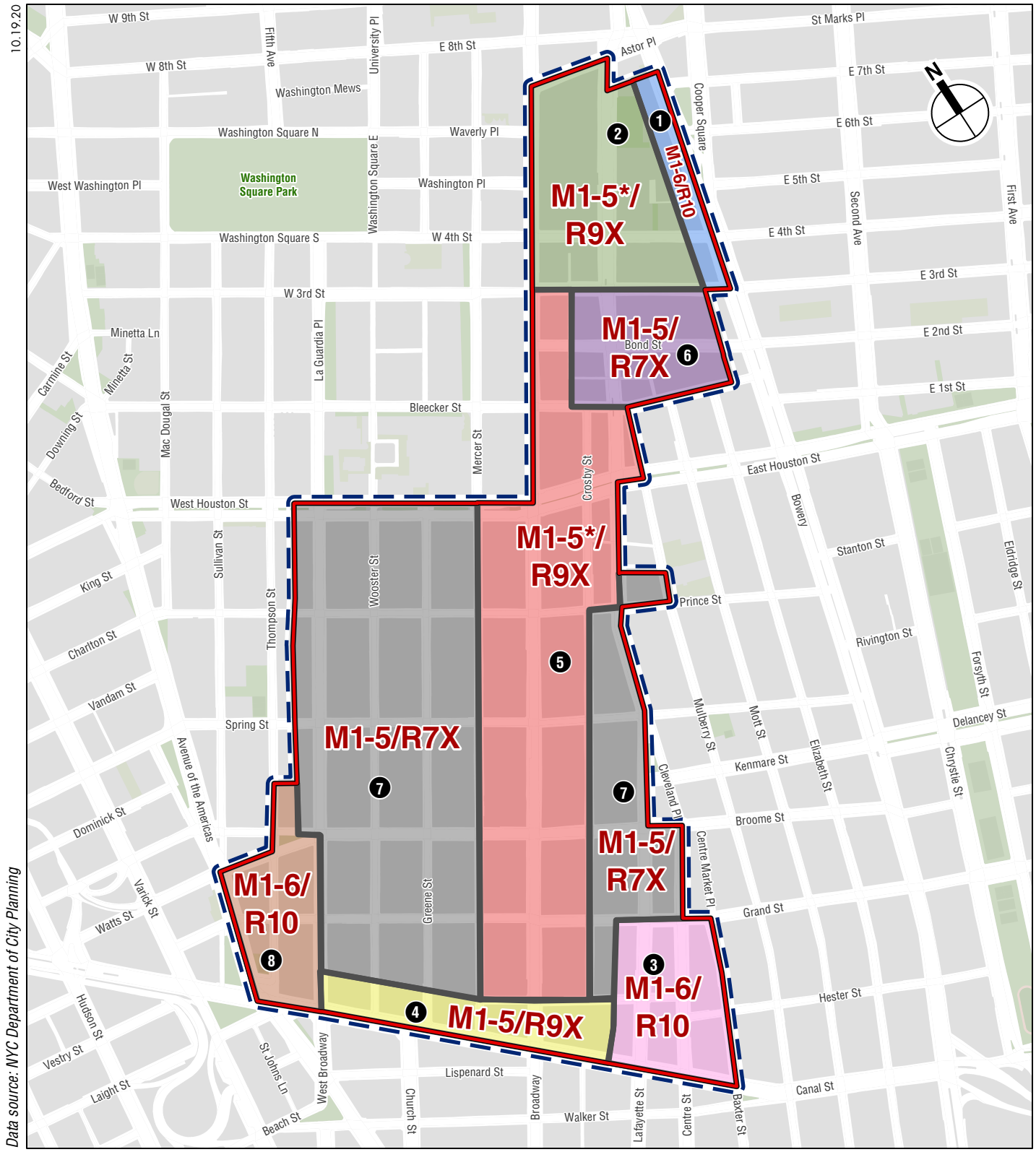
To accomplish these goals, DCP is proposing zoning map and zoning text amendments that would affect a total of approximately 56 blocks in SoHo/NoHo. The CPC has determined that an EIS for the Proposed Actions will be prepared in conformance with CEQR guidelines, with DCP acting on behalf of CPC as the lead agency. The environmental analyses in the EIS will assume a development period of 10 years for the RWCDS for the Proposed Actions (i.e., an analysis year of 2031). DCP will conduct a coordinated review of the Proposed Actions with involved and interested agencies. Each of these actions is discretionary and subject to review under ULURP, Section 200 of the City Charter, and the CEQR process. The Proposed Actions are described in further detail below.

ZONING MAP AMENDMENT

The zoning map amendment would replace all or portions of existing M1-5A and M1-5B districts within the Project Area with a range of paired districts. The zoning map amendment would also establish the Special SoHo NoHo Mixed-Use District (SNMD) in the Project Area.

PROPOSED ZONING DISTRICTS

As detailed in **Table 1** and **Figure 4** below, M1-5/R7X, M1-5/R9X, and M1-6/R10 districts would be mapped in different areas to respond to the varied mix of uses and bulk context within the Project Area. Use and bulk regulations of the proposed paired districts apply, except as modified



Proposed Zoning

SOHO/NOHO NEIGHBORHOOD PLAN

Figure 4

by the SNMD. The zoning districts, as modified by the SNMD, are proposed to reflect differing conditions between corridors and other parts of the neighborhood, achieve the right balance among uses, and facilitate appropriate building forms.

Table 1
Proposed Use and Floor Area Regulations

	Broadway – Houston Corridor & NoHo North Subdistricts	Canal Corridor Subdistrict	SoHo/NoHo Cores – Preservation Subdistrict	SoHo West, SoHo East, and NoHo – Bowery Subdistricts
Use and Floor Area Regulations	M1-5/R9X with modifications 6 FAR for commercial/ manufacturing 9.7 FAR for residential with MIH 6.5 FAR for community facility	M1-5/R9X 5 FAR for commercial/ manufacturing 9.7 FAR for residential with MIH 6.5 FAR for community facility	M1-5/R7X 5 FAR for commercial/ manufacturing 6 FAR for residential with MIH 6.5 FAR for community facility	M1-6/R10 10 FAR for commercial/ manufacturing 12 FAR for residential with MIH 10 FAR for community facility

PROPOSED SPECIAL SOHO/NOHO MIXED-USE DISTRICT (SNMD)

The proposed SNMD would be mapped over the entire Project Area, encompassing 56 blocks, to establish special use and bulk regulations to address SoHo/NoHo's unique history, building typology, and the existing and anticipated mix of uses, and to support the above-specified planning goals. Subdistricts within the SNMD would be established to provide special use and bulk regulations. The SNMD and proposed zoning districts are shown in **Figure 4**.

ZONING TEXT AMENDMENTS

The Proposed Actions include amendments to the text of the New York City Zoning Resolution. The SNMD would be established and would extend over the Project Area. MIH would be mapped across the special district, setting mandatory affordable housing requirements pursuant to the MIH program.

SPECIAL SOHO/NOHO MIXED-USE DISTRICT AND SUBDISTRICTS (SNMD)

The special district would modify the typical regulations of the paired mixed-use districts, establish additional requirements, and establish parameters for future development derived from and respond to block- and neighborhood-wide characteristics.

General Use Regulations

Within the SNMD, the proposed M1-5/R7X, M1-5/R9X, and M1-6/R10 districts' use regulations would apply, with modifications. The SNMD would also include provisions governing JLWQA, arts and cultural uses, and conversions of existing buildings. Large buildings, typically located along the Broadway commercial corridor and representing substantial concentration of commercial and production space, would be required to retain existing non-residential floor area. Use Group 10 retail uses, such as department stores over 10,000 zsf, and physical culture establishments, would be permitted as-of-right. In addition, the SNMD would retain controls on transient hotels.

Joint Live-Work Quarters for Artists

The SNMD would allow existing JLWQA uses to remain. A mechanism would be established to facilitate the voluntary transition from Use Group 17D JLWQA to Use Group 2 residential use with expanded home occupation provisions. The mechanism would be paired with conditions that support arts and culture uses and establishments that broadly benefit the community and the public in and beyond the Project Area.

Non-Residential Floor Area Retention

For developments, enlargement and conversions containing significantly large existing buildings, new residential floor area would be permitted only upon certification by the Chairperson of the CPC that the amount of non-residential floor area in the existing building would be replaced at a one-to-one ratio with future non-residential uses on the zoning lot. In conjunction with such certification, a restrictive declaration would be required to be executed and recorded, requiring the amount of pre-existing non-residential floor area in the existing building to be maintained on the zoning lot. Non-residential uses include office, retail, storage, community facility (except community facility uses with sleeping accommodations), warehouse, light, and industrial manufacturing.

Floor Area and Bulk Regulations

The SNMD would adjust the floor area and bulk regulations of the proposed paired districts to ensure a desirable mix of these uses and facilitate appropriate building forms. The modified floor area for each subdistrict is shown in **Table 1**. To reflect Broadway and the northern portion of NoHo's status as major commercial corridors, and employment hubs, and its concentration of larger loft buildings, commercial and manufacturing FAR would be 6.0 and full lot coverage would be allowed up to two stories. In the Broadway-Houston Corridor, NoHo North, Canal Corridor, SoHo/NoHo Cores subdistricts, characterized by five historic districts with varied built form, special subdistrict provisions would supplement the typical M1-5/R7X and M1-5/R9X bulk regulations to support loft-like building forms that reflect and respect the unique existing and historic character of these areas. In the SoHo West, SoHo East and NoHo Bowery Subdistricts where areas are framed by wide streets and generally located outside of historic districts, special subdistrict regulations would modify the bulk regulations of the typical M1-6/R10 district to allow sufficient flexibility to achieve the development and housing goals while responding to neighborhood context within and around the Project Area.

In addition, the SNMD would provide design flexibility to minimize the effects of new developments and enlargements on neighboring buildings, support harmonious relationship with existing context, and facilitate a desirable pedestrian environment.

MANDATORY INCLUSIONARY HOUSING (MIH) PROGRAM

DCP proposes a zoning text amendment to apply the MIH program to the Project Area. The MIH program requires permanently affordable housing within new residential developments, enlargements, and conversions from non-residential to residential use within the mapped MIH Areas. The program requires permanently affordable housing set-asides for all developments over 10 units or 12,500 zsf within the MIH designated areas or, as an additional option for developments between 10 and 25 units, or 12,500 to 25,000 zsf, a payment into an Affordable Housing Fund. In cases of hardship, where these requirements would make development financially infeasible, developers may apply to the BSA for a special permit to reduce or modify the requirements.

Developments, enlargements, or conversions that do not exceed either 10 units or 12,500 zsf of residential floor area will be exempt from the requirements of the program.

The MIH program includes two primary options that pair set-aside percentages with different affordability levels to reach a range of low and moderate incomes while accounting for the financial feasibility trade-off inherent between income levels and size of the affordable set-aside. Option 1 would require 25 percent of residential floor area to be for affordable housing units for residents with incomes averaging 60 percent of the AMI. Option 1 also includes a requirement that 10 percent of residential floor area be affordable at 40 percent AMI. Option 2 would require 30 percent of residential floor area to be for affordable housing units for residents with incomes averaging 80 percent AMI. The City Council and CPC could decide to apply an additional, limited workforce option for markets where moderate- or middle-income development is marginally financially feasible without subsidy. For all options, no units could be targeted to residents with incomes above 130 percent AMI. In addition, a Deep Affordability Option could also be applied in conjunction with Options 1 and 2. The Deep Affordability Option would require that 20 percent of the residential floor area be affordable to residents at 40 percent AMI.

The text amendment may provide for some adjustments to make the existing MIH program work for conversions in SoHo/NoHo, where idiosyncratic building types and complex occupancies may result in atypical configurations.

WRP REVIEW PROCESS AND DETERMINATION

Portions of the Project Area are within the coastal zone and would therefore be reviewed by CPC, in its capacity as the CCC to determine if the Proposed Actions are consistent with the relevant WRP policies.

G. ANALYSIS FRAMEWORK

REASONABLE WORST CASE DEVELOPMENT SCENARIO

In order to assess the possible effects of the Proposed Actions, a RWCDS was developed, in accordance with the methodologies in the *CEQR Technical Manual*. The RWCDS was prepared to assess the future condition absent the Proposed Actions (No Action condition) and the future condition with the Proposed Actions (With Action condition) for a 10-year period (analysis year 2031). The incremental difference between the With Action and No Action conditions will serve as the basis for the impact analyses of the EIS. A 10-year period typically represents the amount of time developers would act on the proposed action for an area-wide rezoning not associated with a specific development. To determine the With Action and No Action conditions, standard site selection criteria have been used following the *CEQR Technical Manual* guidelines, as described below. These methodologies have been used to identify the amount and location of future development in response to the Proposed Actions.

THE FUTURE WITHOUT THE PROPOSED ACTIONS (NO ACTION CONDITION)

In the No Action condition, the identified projected development sites are assumed to remain unchanged from existing conditions. Given the restrictive ground floor use regulations and the outdated manufacturing zoning, vacant parcels and sites occupied by low intensity uses are not likely to be developed as-of-right. The No Action condition on the projected development sites is shown in **Appendix 1**.

The limited number of recent developments in SoHo and NoHo have consisted of mid- to high-rise market-rate residential buildings pursuant to special permits, and to a lesser extent, zoning

text amendments, approved by the CPC, variances granted by the BSA, or mid-rise commercial office/retail buildings have been allowed with CPC or BSA approvals to allow commercial uses below the level of the second story or destination retail over 10,000 sf on Broadway and Houston Street. A few sites as small as 1,700 sf have been developed as one-story restaurants and bars.

In the No Action condition, based on recent development trends, it is anticipated that there would be limited development in SoHo and NoHo. Residential development would not be able to occur without a zoning text amendment. Commercial development would require discretionary actions by the CPC or variances by the BSA to allow complementary and necessary commercial uses on the ground floor such as retail and office lobbies, and the inventory of sites sufficiently large to generate more marketable floor plate has diminished. Outside of historic districts, while underutilized sites could be developed pursuant to the existing M1-5A and M1-5B district regulations without LPC's review, outside of BSA variances, there is no provision under existing zoning to allow residential development, and commercial development would likely require special permits to allow economically viable uses on the ground floor. Without the proposed actions, it is anticipated that residential conversions and conversion of former industrial space to commercial uses would continue to occur on occasion, if CPC discretionary actions or BSA variances can be obtained. However, to present a conservative environmental analysis, these discretionary actions are not assumed to be granted in the No Action condition.

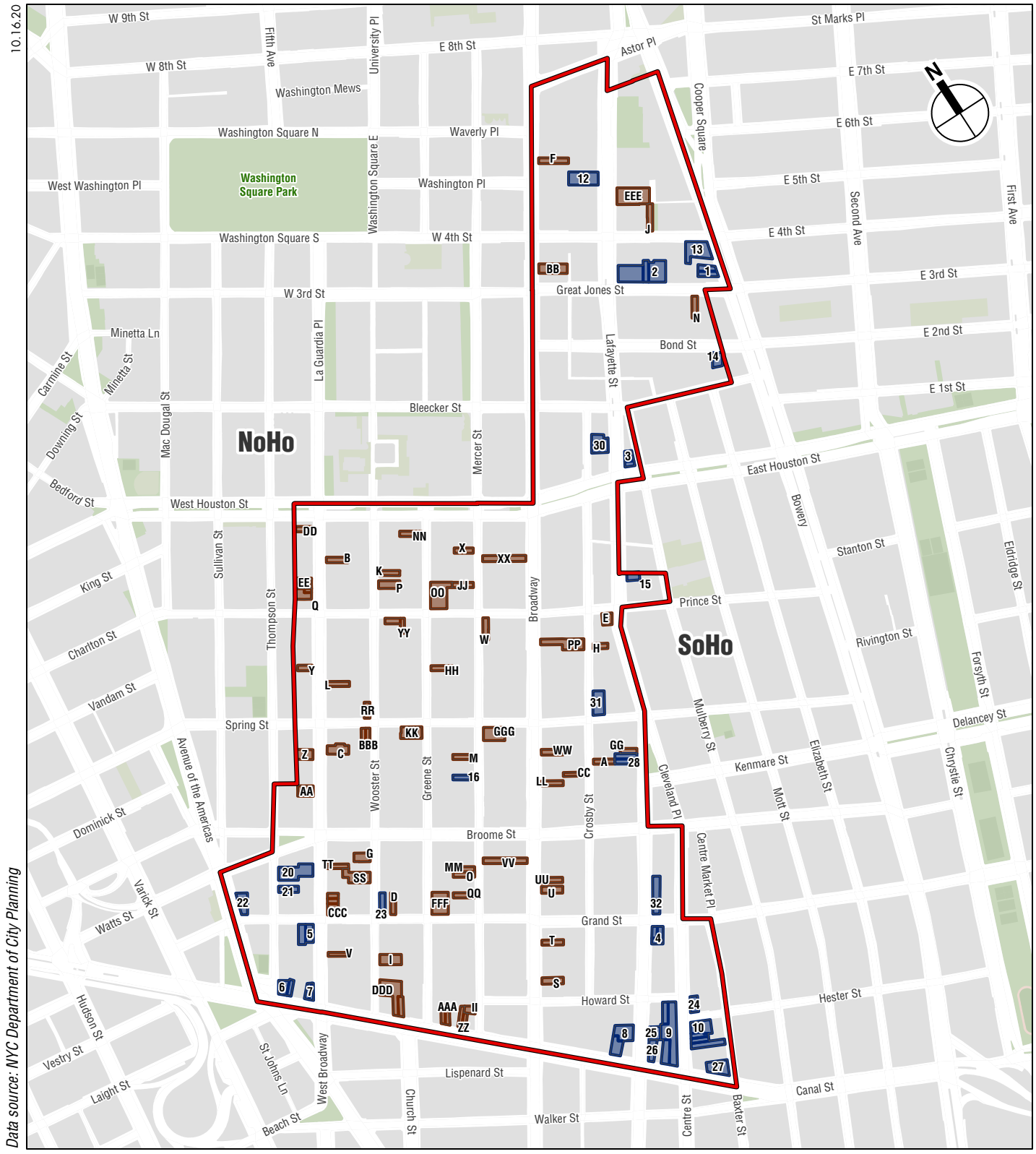
As detailed below, it is anticipated that, in the future without the Proposed Actions, existing conditions will remain. Under the RWCDS, the total No Action development would comprise 16 existing DUs with no affordability requirement, 112,190 gsf (99,841 zsf) of local retail space, 207,576 gsf (184,738 zsf) of office space, a 39,000 gsf (34,710 zsf) parking garage, and 25,839 gsf (22,995 zsf) of manufacturing space (warehouse and industrial). Based on the 2014–2018 American Community Survey, the average household size for residential units in Manhattan Community District 2 is 1.89. The No Action estimated population would remain unchanged.

THE FUTURE WITH THE PROPOSED ACTIONS (WITH ACTION CONDITION)

The Proposed Actions would allow for the development of new uses and higher densities at the projected and potential development sites. The Proposed Actions would allow residential use on an as-of-right basis and facilitate residential infill development, which is projected to result in significant housing production, including affordable housing. This residential development would include ground-floor retail across the rezoning area and second-story commercial use along major corridors. Several sites with wider street frontages that would accommodate larger building footprints are anticipated to be redeveloped with a mix of residential, community facility and/or commercial uses. One entirely non-residential building is projected in the western portion of the Project Area near Hudson Square, another strong office market. A few substantially built existing commercial buildings are assumed to be converted to residential use as representative examples of conversions that are anticipated to occur.

Under the Proposed Actions, the total development expected to occur on the 27 projected development sites would consist of approximately 2,001,545 gsf (1,741,230 zsf) of built floor area, including approximately 1,699 DUs, a substantial proportion of which are expected to be affordable, 169,663 gsf (147,595 zsf) of retail space (local and destination retail, supermarket), and 19,598 gsf (17,050 zsf) of community facility uses (see **Figure 5**).

The net change between the With Action and No Action conditions that would result from the Proposed Actions would be a net increase of approximately 1,683 DUs (including 328 to 494



Projected and Potential Development Sites

SOHO/NOHO NEIGHBORHOOD PLAN

Figure 5

affordable units); 57,473 gsf (47,754 zsf) of projected retail space (local and destination retail, supermarket); 19,598 square feet of projected community facility space.

Based on the 2014–2018 American Community Survey, the average household size for residential units in Manhattan Community District 2 is 1.89. Based on these ratios and standard ratios for estimating employment for commercial, community facility, and industrial uses, **Table 2** also provides an estimate of the number of residents and workers generated by the Proposed Actions. As indicated in **Table 2**, the Proposed Actions would result in a net increment of 3,181 residents.

A total of 57 sites, with the potential to provide 1,548 DUs, including between 293 and 446 MIH units, were considered less likely to be developed within the foreseeable future and were thus considered potential development sites (see **Figure 5**). As noted earlier, the potential sites are deemed less likely to be developed because they did not closely meet the criteria described below. However, the analysis recognizes that a number of potential development sites could be developed under the Proposed Actions in lieu of one or more of the projected development sites in accommodating the development anticipated in the RWCDS. The potential development sites are therefore also analyzed in the EIS for site-specific effects.

Development shown on sites within historic districts is assumed to maximize the permitted FAR within the allowable building envelope for conservative analysis purposes. The represented building form does not reflect the LPC's future review and approval, which is required for actual development on all of the projected and potential sites on a site-by-site basis.

Table 2
RWCDS No Action and With Action Land Uses

Land Use	No Action Condition	With Action Condition	Increment
Residential			
Residential	***16 DUs (2–4 affordable)***	***1,699 DUs (330–498 Affordable)***	***1,683 DUs (328–494 Affordable)***
Commercial			
Office	207,576 gsf / 184,738 zsf	137,595 gsf / 119,788 zsf	(69,981 gsf) / (64,950 zsf)
Local Retail	112,190 gsf / 99,841 zsf	118,699 gsf / 103,258 zsf	6,509 gsf / 3,417 zsf
Destination Retail	-	19,094 gsf / 16,611 zsf	19,094 gsf / 16,611 zsf
Supermarket	-	31,870 gsf / 27,726 zsf	31,870 gsf / 27,726 zsf
Other Commercial (Parking)	39,000 gsf / 34,710 zsf	-	(39,000 gsf) / (34,710 zsf)
Total Commercial	***358,766 gsf / 319,293 zsf***	***307,258 gsf / 267,383 zsf***	***(51,508 gsf) / (51,910 zsf)***
Other Uses			
Community Facility	***-***	***19,598 gsf / 17,050 zsf***	***19,598 gsf / 17,050 zsf***
Light Industrial/ Manufacturing	***25,839 gsf / 22,995 zsf***	***-***	***(25,839 gsf) / (22,995 zsf)***
Vacant	***-***	***-***	***-***
Population[1]			
Residents	30	3,211	3,181
Workers	1,205	1,096	-109

Notes: sf = square feet
[1] Assumes 1.89 persons per DU for residential units in Manhattan Community District 2. Estimate of workers based on standard industry rates, as follows: 1 employee per 250 sf of office; 1 employee per 333 sf of local retail, 1 employee per 875 sf of destination retail, 1 employee per 1,000 sf of other commercial, 1 employee per 400 sf of supermarket, 1 employee per 1,000 sf community facility, 1 employee per 25 DU, 1 employee per 2.67 hotel rooms (400 sf per hotel room), 1 employee per 1,000 sf of industrial/warehouse, and 1 employee per 25 dwelling units

GENERAL CRITERIA FOR DETERMINING DEVELOPMENT SITES

In determining the amount and location of new development, several factors have been considered in identifying likely development sites. These include known development proposals, past and current development trends, and the development site criteria described below. Generally, for area-wide rezonings that create a broad range of development opportunities, new development can be expected to occur on selected, rather than all, sites within the rezoning area. The first step in establishing the development scenario for the Proposed Actions was to identify those sites where new development could be reasonably expected to occur.

Development sites were initially identified based on the following criteria:

- Lots located in areas where a substantial increase in permitted FAR is proposed.
- Lots with a total size of 1,700 sf or larger (may include potential assemblages with two owners or fewer, if assemblage seems probable). This lot area threshold takes into account local market conditions, lot sizes of recent new developments in the rezoning area, the minimum lot area requirement for residential development in all medium and high density zoning districts, and building constructability.
- Underutilized lots which are defined as vacant, occupied as a parking lot/facility, a building with only a single occupied floor, or lots constructed to less than or equal to half of the maximum allowable FAR under the proposed zoning.
- Lots located in areas where changes in use would be permitted by the Proposed Actions, such as commercial to residential conversions, change of use between an expanded suite of

commercial and light industrial uses permitted by the proposed zoning districts and special district regulations.

- Sites with non-residential uses in locations where residential uses will be newly allowed, including non-residential buildings with conditions conducive to residential conversion.

Certain lots that meet these criteria have been excluded from the development scenario based on the following conditions, in accordance with the guidance provided in the *CEQR Technical Manual*, and because they are very unlikely to be redeveloped as a result of the Proposed Actions:

- Lots occupied by buildings designated by the LPC as individual landmarks. Individual landmarks are subject to LPC review at significant level of scrutiny and are therefore highly unlikely to be altered or redeveloped.
- Lots where construction is actively occurring, or has recently been completed, as well as lots with recent alterations that would have required substantial capital investment. However, recently constructed or altered lots that were built to less than or equal to half of the maximum allowable FAR under the proposed zoning have been included for consideration as likely development sites.
- The sites of government facilities including environmental and transportation infrastructure, utilities, large institutions, homeless shelters, and houses of worship. These facilities may meet the development site criteria, because they are built to less than half of the permitted floor area under the current zoning and are on larger lots. However, these facilities have not been redeveloped or expanded despite the ability to do so, and it is extremely unlikely that the increment of additional FAR permitted under the proposed zoning would induce redevelopment or expansion of these structures. In addition, for government-owned properties, development and/or sale of these lots may require discretionary actions from the pertinent government agency.
- Multi-unit buildings with existing tenants, such as existing individual buildings with six or more residential units, and assemblages of buildings with a total of 6 or more residential units, are unlikely to be redeveloped because of the required relocation of tenants in rent-stabilized units).
- Certain substantially built and actively used commercial structures, such as multi-story office buildings, regional centers of national corporations, and hotels. Although these sites may meet the criteria for being built to less than half of the proposed permitted floor area, some of them are unlikely to be redeveloped due to their current or potential profitability, the cost of demolition and redevelopment, and their location.
- Lots whose highly irregular shape, insufficient depth, and/or width would preclude or greatly limit future as of right development. Generally, development on highly irregular lots does not produce marketable floor space.
- Sites with recently granted CPC special permit for significant use and/or bulk changes that also involved discretionary review by the LPC. Costs and time associated with obtaining a special permit, public review and environmental review process would have required substantial investment.

PROJECTED AND POTENTIAL DEVELOPMENT SITES

To produce a reasonable, conservative estimate of future growth, the development sites have been divided into two categories: projected development sites and potential development sites. The projected development sites are considered more likely to be developed within the 10-year analysis

period. Potential sites are considered less likely to be developed over the approximately 10-year analysis period. Projected and potential development sites were identified based on the following criteria:

Projected Development Sites

- All identified development sites are considered as projected development sites except as described below.
- Sites partially located within and partially outside of historic districts will be considered in this EIS as projected development sites for conservative analysis purposes. Since these lots straddle historic district boundaries, it is assumed that it is possible to concentrate future development on portions of the lot outside of historic districts where LPC review is not required.

Potential Development Sites

- Lots with slightly irregular shapes or challenging configurations (overly narrow, deep), small (generally between 1,700 sf and 2,000 sf in lot area), or encumbrances which would make development more difficult will be considered potential development sites in the EIS.
- Sites located within historic districts that are occupied by existing buildings will be considered potential development sites in the EIS. The demolition, redevelopment and/or enlargement of these buildings are subject to LPC review and approval, which could contribute to higher development cost and longer timeframe.

Based on the above criteria, a total of 84 development sites (27 projected and 57 potential) have been identified in the rezoning area. These projected and potential development sites are depicted in **Figure 5** and the detailed RWCDS tables provided in **Appendix 1** identify the uses expected to occur on each of these sites under No Action and With Action conditions.

The EIS will assess the potential for both density-related and site-specific significant adverse impacts from development on all projected development sites. Density-related analyses are dependent on the amount and type of development projected on a site, and include analysis categories such as traffic, air quality, community facilities, and open space.

Site-specific analyses relate to individual site conditions and are not dependent on the density of projected development. Site-specific analyses include potential noise impacts from development, the effects on historic resources, and the possible presence of hazardous materials. Development is not anticipated on the potential development sites in the foreseeable future. Therefore, these sites have not been included in the density-related impact assessments. However, review of site-specific impacts for these sites will be conducted in order to present a conservative analysis in accordance with the *CEQR Technical Manual*.

DEVELOPMENT SCENARIO PARAMETERS

For the purposes of presenting a conservative analysis, and where applicable, reasonable factors based on recent development trends were utilized to approximate the gross square footage, zoning floor area, and DU size of each soft site analyzed in this document.

Dwelling Unit Factor

The number of projected dwelling units in apartment buildings is determined by dividing the total amount of residential floor area by 850 sf and rounding to the nearest whole number.

Floor-to-floor Height

The floor-to-floor heights for all non-residential use is assumed to be 15 feet. The floor-to-floor heights for all residential uses is assumed to be 10 feet

Conversion Prototypes

It is anticipated that residential conversion of non-residential floor area would occur in the With Action condition, and that certain substantially built, mid-sized non-residential buildings are more conducive to residential conversions, due to building footprint, floor plate configuration, street frontage and yard conditions. For conservative analysis purposes, two of the conversion prototypes also include floor area reallocation and vertical bulk changes. Conversions are shown on several projected development sites distributed across the Project Area as representative examples for analysis purposes.

Development within Historic Districts on Projected and Potential Sites

Development shown on sites within historic districts is assumed to maximize the permitted FAR within the allowable building envelope for conservative analysis purposes. The represented building form does not reflect LPC's future review and approval, which is required for actual development on all of the projected and potential sites on a site-by-site basis.

H. PROPOSED DRAFT SCOPE OF WORK FOR THE EIS

Because the Proposed Actions would affect various areas of environmental concern and were found to have the potential for significant adverse impacts in a number of impact categories, pursuant to the EAS and Positive Declaration, an EIS will be prepared that will analyze all technical areas of concern. The EIS will be prepared in conformance with all applicable laws and regulations, including the State Environmental Quality Review Act (SEQRA) (Article 8 of the New York State Environmental Conservation Law) and its implementing regulations found at 6 NYCRR Part 617, New York City Executive Order No. 91 of 1977, as amended, and the Rules and Procedure for CEQR, found at Title 62, Chapter 5 of the Rules of the City of New York.

The EIS, following the guidance of the 2014 *CEQR Technical Manual*, will include:

- A description of the Proposed Actions and their environmental setting;
- A statement of the environmental impacts of the Proposed Actions, including short- and long-term effects and typical associated environmental effects;
- An identification of any adverse environmental effects that cannot be avoided if the Proposed Actions are implemented;
- A discussion of reasonable alternatives to the Proposed Actions;
- An identification of irreversible and irretrievable commitments of resources that would be involved in the Proposed Actions, should they be implemented; and
- A description of mitigation proposed to eliminate or minimize any significant adverse environmental impacts.

As noted above, the EIS will analyze the projected development sites for all technical areas of concern and evaluate the effects of the potential development sites for site-specific effects, such as archaeology, shadows, hazardous materials, air quality, and noise. The analyses in the EIS will examine the RWCDS with the greater potential environmental impact for each impact area. The specific technical areas to be included in the EIS, as well as their respective tasks and methodologies, are described below.

TASK 1. PROJECT DESCRIPTION

The first chapter of the EIS introduces the reader to the Proposed Actions and sets the context in which to assess impacts. This chapter contains a description of the Proposed Actions: their location; the background and/or history of the project; a statement of the purpose and need; key planning considerations that have shaped the current proposal; a detailed description of the Proposed Actions; and discussion of the approvals required, procedures to be followed, and the role of the EIS in the process. This chapter is the key to understanding the Proposed Actions and their impact and gives the public and decision makers a base from which to evaluate the Proposed Actions.

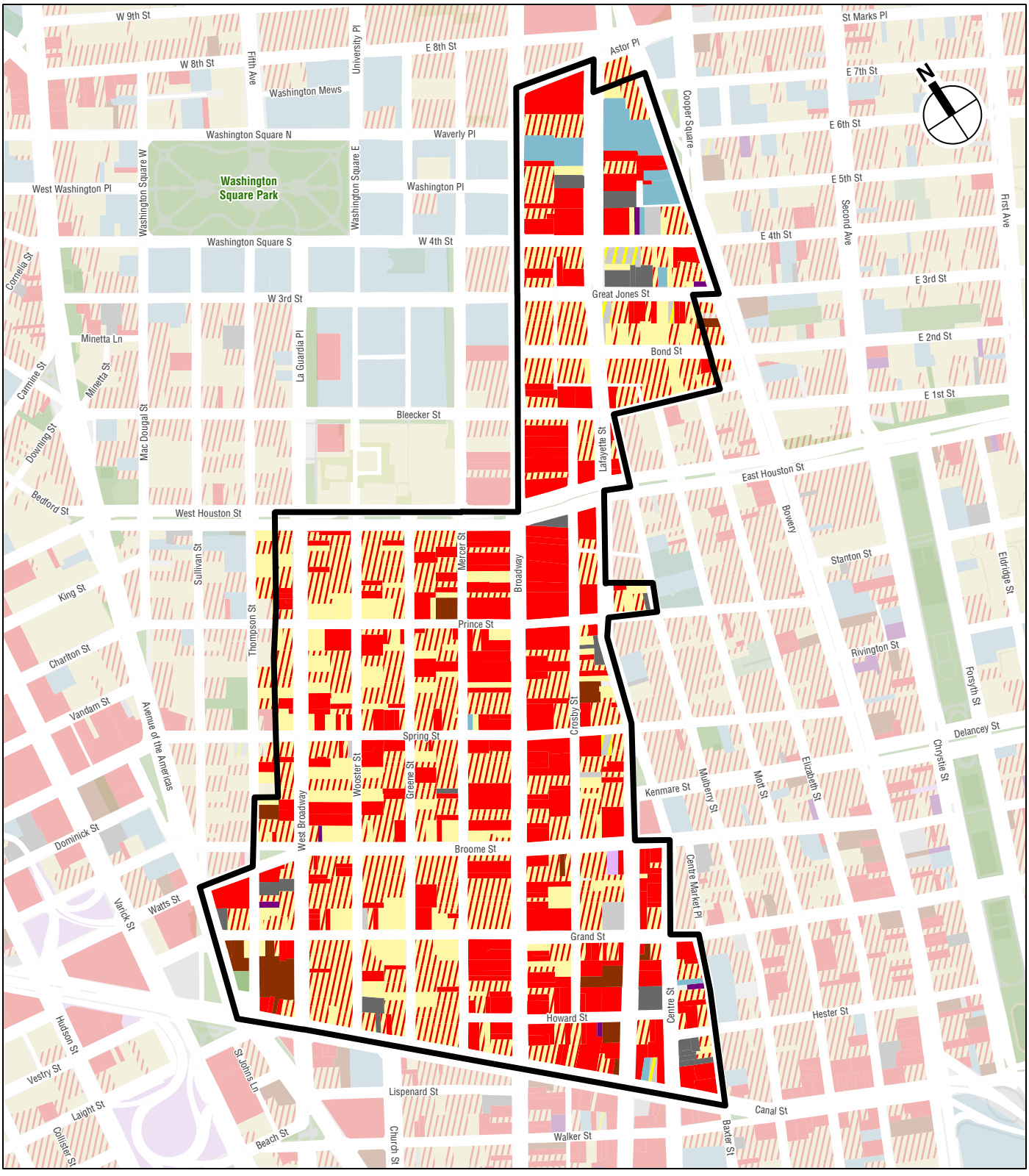
In addition, the project description chapter will present the planning background and rationale for the actions being proposed and summarize the RWCDS for analysis in the EIS. The section on approval procedure will explain the ULURP, zoning text amendment, and zoning map amendment processes, their timing,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

TASK 2. LAND USE, ZONING, AND PUBLIC POLICY

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

The primary land use study area will consist of the Project Area, where the potential effects of the Proposed Actions would be directly experienced. The secondary land use study area will include neighboring areas within a ¼-mile boundary from the primary study area (see **Figure 6**). The analysis will include the following tasks:

- Provide a brief development history of the primary (i.e., rezoning area) and secondary study areas.
- Provide a description of land use, zoning, and public policy in the study areas discussed above (a more detailed analysis will be conducted for the Project Area). Recent trends in will be noted. Other public policies that apply to the study areas will also be described including Housing New York, Vision Zero, the Food Retail Expansion to Support Health (FRESH) Program, applicable business improvement districts (BIDs), applicable IBZs, and OneNYC, the City's sustainability plan.
- Based on field surveys and prior studies, identify, describe, and graphically portray predominant land use patterns for the balance of the study areas. Describe recent land use trends in the study areas and identify major factors influencing land use trends.
- Describe and map existing zoning and recent zoning actions in the study areas.
- Prepare a list of future development projects in the study areas that are expected to be constructed by the 2031 analysis year and may influence future land use trends. Also, identify known pending zoning actions or other public policy actions that could affect land use patterns and trends in the study areas. Based on these planned projects and initiatives, assess future land use and zoning conditions in the future without the Proposed Actions.



Existing Land Use

SOHO/NOHO NEIGHBORHOOD PLAN

Figure 6

- Describe proposed zoning changes and the potential land use changes based on the Proposed Actions' RWCDS for future conditions with the Proposed Actions.
- Discuss the Proposed Actions' potential effects related to issues of compatibility with surrounding land use, the consistency with zoning and other public policies, and the effect of the Proposed Actions on development trends and conditions in the primary and secondary study areas.
- Assess the Proposed Actions' conformity to city goals, including consistency with the WRP. The EIS will also discuss all relevant area planning documents and their implications for existing land use and future development.
- If necessary, mitigation measures to avoid or reduce potential significant adverse land use, zoning, and/or public policy impacts will be identified.

TASK 3. SOCIOECONOMIC CONDITIONS

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

The socioeconomic study area boundaries are expected to be similar to those of the land use study area, and will be dependent on the size and characteristics of the RWCDS associated with the Proposed Actions, pursuant to Section 310 of Chapter 5 of the *CEQR Technical Manual*. A socioeconomic assessment seeks to assess the potential to change socioeconomic character relative to the study area population. The Proposed Actions are expected to generate a net increase of approximately 1,683 DUs. For projects or actions that result in an increase in population, the scale of the relative change is typically represented as a percent increase in population (i.e., a project that would result in a relatively large increase in population may be expected to affect a larger study area). Therefore, the socioeconomic study area would be expanded to a half-mile radius, if the RWCDS associated with the Proposed Actions would increase the population by five percent compared with the expected No Action population in a ¼-mile study area, consistent with the *CEQR Technical Manual*.

The five principal issues of concern with respect to socioeconomic conditions are whether a proposed action would result in significant adverse impacts due to: (1) direct residential displacement; (2) direct business displacement; (3) indirect residential displacement; (4) indirect business displacement; and (5) adverse effects on specific industries. As detailed below, the Proposed Actions warrant an assessment of socioeconomic conditions with respect to all but one of these principal issues of concern—direct residential displacement. Direct displacement of fewer than 500 residents would not typically be expected to alter the socioeconomic characteristics of a neighborhood. The Proposed Actions would not exceed the *CEQR Technical Manual* analysis threshold of 500 displaced residents, and therefore, are not expected to result in significant adverse impacts due to direct residential displacement. The EIS will disclose the number of residential units and estimated number of residents to be directly displaced by the Proposed Actions, and will determine the amount of displacement relative to study area population. The assessment of the four remaining areas of concern will begin with a preliminary assessment to determine whether a detailed analysis is necessary, in conformance with the *CEQR Technical Manual* guidelines.

Detailed analyses will be conducted for those areas in which the preliminary assessment cannot definitively rule out the potential for significant adverse impacts. The detailed assessments will be framed in the context of existing conditions and evaluations of the No Action and With Action conditions in 2031, including any population and employment changes anticipated to take place by the analysis year for the Proposed Actions.

DIRECT BUSINESS DISPLACEMENT

For direct business displacement, the type and extent of businesses and workers to be directly displaced by the RWCDS associated with the Proposed Actions will be disclosed. If a project would directly displace more than 100 employees, a preliminary assessment of direct business displacement is appropriate according to the *CEQR Technical Manual*. The Proposed Actions have the potential to exceed the threshold of 100 displaced employees, and therefore, a preliminary assessment will be provided in the EIS.

The analysis of direct business displacement will estimate the number of employees and the number and types of businesses that would be displaced by the Proposed Actions, and characterize the economic profile of the study area using current employment and business data from the New York State Department of Labor or U.S. Census Bureau. This information will be used in addressing the following CEQR criteria for determining the potential for significant adverse impacts: (1) whether the businesses to be displaced provide products or services essential to the local economy that would no longer be available in its "trade area" to local residents or businesses due to the difficulty of either relocating the businesses or establishing new, comparable businesses; and (2) whether a category of businesses is the subject of other regulations or publicly adopted plans to preserve, enhance, or otherwise protect it.

INDIRECT RESIDENTIAL DISPLACEMENT

Indirect residential displacement is the involuntary displacement of residents that results from a change in socioeconomic conditions created by a proposed action. Indirect residential displacement could occur if a proposed project either introduces a trend or accelerates a trend of changing socioeconomic conditions that may potentially displace a vulnerable population to the extent that the socioeconomic character of the neighborhood would change. To assess this potential impact, the analysis will address a series of threshold questions in terms of whether the project substantially alters the demographic character of an area through population change or introduction of more costly housing.

The indirect residential displacement analysis will use the most recent available U.S. Census data, New York City Department of Finance's Real Property Assessment Data (RPAD) database, as well as current real estate market data, to present demographic and residential market trends and conditions for the study area. The presentation of study area characteristics will include population estimates, housing tenure and vacancy status, median value and rent, estimates of the number of housing units not subject to rent protection, and median household income. The preliminary assessment will carry out the following the step-by-step evaluation, pursuant to *CEQR Technical Manual* guidelines:

- Step 1: Determine if the Proposed Actions would add substantial new population with different income as compared with the income of the study area population. If the expected average incomes of the new population would be similar to the average incomes of the study area populations, no further analysis is necessary. If the expected average incomes of the new population would exceed the average incomes of the study area populations, then Step 2 of the analysis will be conducted.

- Step 2: Determine if the Proposed Actions' population is large enough to affect real estate market conditions in the study area. If the population increase may potentially affect real estate market conditions, then Step 3 will be conducted.
- Step 3: Determine whether the study area has already experienced a readily observable trend toward increasing rents and the likely effect of the action on such trends and whether the study area potentially contains a population at risk of indirect displacement resulting from rent increases due to changes in the real estate market caused by the new population.

A detailed analysis, if warranted, would utilize more in-depth demographic analysis and field surveys to characterize existing conditions of residents and housing, identify populations at risk of displacement, assess current and future socioeconomic trends that may affect these populations, and examine the effects of the Proposed Actions on prevailing socioeconomic trends and, thus, impacts on the identified populations at risk.

INDIRECT BUSINESS DISPLACEMENT

The indirect business displacement analysis is to determine whether the Proposed Actions may introduce trends that make it difficult for those businesses that provide products or services essential to the local economy, or those subject to regulations or publicly adopted plans to preserve, enhance, or otherwise protect them, to remain in the area. The purpose of the preliminary assessment is to determine whether a proposed action has potential to introduce such a trend. The Proposed Actions would result in a net decrease of approximately 51,508 gsf (51,910 zsf) of commercial uses and therefore would not introduce enough new economic activity to alter existing economic patterns. However, the Proposed Actions would result in direct business displacement that, in turn, could have indirect effects. The preliminary assessment will entail the following tasks:

- Identify and characterize conditions and trends in employment and businesses within the study area. This analysis will be based on field surveys, employment data from the New York State Department of Labor and/or Census and discussions with real estate brokers.
- Determine whether the Proposed Actions would directly displace uses of any type that directly support businesses in the area or bring people to the area that form a customer base for local businesses.
- Determine whether the Proposed Actions would directly or indirectly displace residents, workers, or visitors who form the customer base of existing businesses in the area.

If the preliminary assessment determines that the Proposed Actions could introduce trends that make it difficult for businesses that are essential to the local economy to remain in the area, a detailed analysis will be conducted. Following the *CEQR Technical Manual* guidelines, the detailed analysis would identify businesses that are potentially vulnerable to indirect displacement, determine whether the Proposed Actions could create conditions leading to their displacement, and evaluate whether relocation opportunities exist for those businesses.

ADVERSE EFFECTS ON SPECIFIC INDUSTRIES

The analyses of direct and indirect business displacement will provide sufficient information to determine whether the Proposed Actions could have any adverse effects on a specific industry, compared with the future without the Proposed Actions. The analysis will determine:

- Whether the Proposed Actions would significantly affect business conditions in any industry or category of businesses within or outside the study areas.

- Whether the Proposed Actions would substantially reduce employment or impair viability in a specific industry or category of businesses.

TASK 4. COMMUNITY FACILITIES AND SERVICES

The demand for community facilities and services is directly related to the type and size of the new population generated by the development resulting from the Proposed Actions. The RWCDS associated with the Proposed Actions would add approximately 1,683 (net) new DUs to the area with up to 494 affordable DUs. This level of development would trigger a detailed analysis of elementary and intermediate schools, libraries, and childcare centers, according to the *CEQR Technical Manual* guidelines and as presented in the EAS document. Therefore, detailed analyses will be provided. While the RWCDS would not trigger detailed analyses of potential impacts on police/fire stations and health care services, for informational purposes a description of existing police, fire, and health care facilities serving the rezoning area will be provided in the EIS.

PUBLIC SCHOOLS

- The primary study area for the analysis of elementary and intermediate schools should be the school districts' "subdistrict" in which the project is located. As the Project Area is located within Community School District (CSD) 2, Subdistricts 1 and 2, the elementary and intermediate school analyses will be conducted for schools in those subdistricts.
- Public elementary and intermediate schools serving the subdistrict will be identified and located. Existing capacity, enrollment, and utilization data for all public elementary and intermediate schools within the affected subdistrict will be provided for the current (or most recent) school year, noting any specific shortages of school capacity.
- Conditions that would exist in the No Action condition for the subdistrict will be identified, taking into consideration projected changes in future enrollments, including those associated with other developments in the affected subdistrict, using SCA's Projected New Housing Starts in conjunction with the SCA multipliers. Plans to alter school capacity, either through administrative actions on the part of the Department of Education (DOE) or as a result of the construction of new school space prior to the analysis year of 2031, will also be identified and incorporated into the analyses. Planned new capacity projects from DOE's Five Year Capital Plan will not be included in the quantitative analysis unless the projects have commenced site preparation and/or construction. They may, however, be included in a qualitative discussion.
- Future conditions with the Proposed Actions will be analyzed, adding students likely to be generated under the RWCDS to the projections for the No Action condition. Adverse impacts will be assessed based on the difference between the future With Action projections and the No Action projections (at the subdistrict level for elementary and intermediate schools) for enrollment, capacity, and utilization in the analysis year.
- A determination of whether the Proposed Actions would result in significant adverse impacts to elementary, intermediate, and/or high schools will be made. The Proposed Actions may result in a significant adverse impact, warranting consideration of mitigation, if: (1) a collective utilization rate of the elementary and/or intermediate schools in the subdistrict study area that is equal to or greater than 100 percent in the With Action condition; and (2) an increase of five percentage points or more in the collective utilization rate between the No Action and With Action conditions. If impacts are identified, mitigation will be developed in consultation with SCA and DOE.

LIBRARIES

- Local public library branch(es) serving the area within approximately ¾-mile of the rezoning area, which is the distance that one might be expected to travel for such services, will be identified and presented on a map.
- Existing libraries within the study area and their respective information services and user populations will be described. Information regarding services provided by branch(es) within the study area will include holdings and other relevant existing conditions. Details on library operations will be based on publicly available information and/or consultation with New York Public Library officials. If applicable, holdings per resident may be estimated to provide a quantitative gauge of available resources in the applicable branch libraries in order to form a baseline for the analysis.
- For the No Action condition, projections of population change in the area and information on any planned changes in library services or facilities will be described, and the effects of these changes on library services will be assessed. Using the information gathered for existing conditions, holdings per resident in the No Action condition will be estimated.
- The effects of the addition of the population resulting from the Proposed Actions on the library's ability to provide information services to its users will be assessed. Holdings per resident in the With Action condition will be estimated and compared with the No Action holdings estimate.
- If the Proposed Actions would increase a branch library's ¾-mile study area population by five percent or more over No Action levels, and it is determined, in consultation with the New York Public Library, that this increase would impair the delivery of library services in the study area, a significant adverse impact may occur, warranting consideration of mitigation.

CHILD CARE CENTERS

- Existing publicly funded childcare centers within approximately 1.5 (up to 2 if appropriate) miles of the rezoning area will be identified. Each facility will be described in terms of its location, number of slots (capacity), enrollment, and utilization in consultation with the DOE.
- For No Action conditions, information will be obtained for any changes planned for child care programs or facilities in the area, including the closing or expansion of existing facilities and the establishment of new facilities. Any expected increase in the population of children under age six within the eligibility income limitations, using the No Action RWCDS (see "Analysis Framework"), will be discussed as potential additional demand, and the potential effect of any population increases on demand for child care services in the study area will be assessed. The available capacity or resulting deficiency in slots and the utilization rate for the study area will be calculated for the No Action condition.
- The potential effects of the additional eligible children resulting from the Proposed Actions will be assessed by comparing the estimated net demand over capacity to a net demand over capacity in the No Action analysis.
- A determination of whether the Proposed Actions would result in significant adverse impacts to childcare centers will be made. A significant adverse impact may result, warranting consideration of mitigation, if the Proposed Actions would result in both of the following: (1) a collective utilization rate of the group child care centers in the study area that is greater than 100 percent in the With Action condition; and (2) an increase of five percentage points

or more in the collective utilization rate of child care centers in the study area between the No Action and With Action conditions.

TASK 5. OPEN SPACE

If a project may add population to an area, demand for existing open space facilities would typically increase. Indirect effects may occur when the population generated by the proposed project would be sufficiently large to noticeably diminish the ability of an area's open space to serve the future population. For the majority of projects, an assessment is conducted if the proposed project would generate more than 200 residents or 500 employees, or a similar number of other uses. The Proposed Actions would generate a net increase of approximately 3,181 residents and net decrease of 109 employees. However, the need for an open space assessment may vary in certain areas of the City that are considered either underserved or well-served by open space. As the Project Area is located in an underserved area, a residential open space assessment is warranted and will be provided in the EIS.

The open space analysis will consider both passive and active open space resources. Passive and active open space ratios will be assessed within a ½-mile study area. The study area will generally comprise those census tracts that have 50 percent or more of their area located within the ½-mile radius of the rezoning area.

The detailed open space analysis in the EIS will include the following tasks:

- Characteristics of the open space user group (residents) will be determined. To determine the number of residents in the study areas, 2010 U.S. Census data will be compiled for census tracts comprising the residential open space study area.
- Existing active and passive open spaces within ½-mile open space study area will be inventoried and mapped. The condition and usage of existing facilities will be described based on the inventory and field visits. In accordance with *CEQR Technical Manual* guidelines, field visits will be conducted during peak hours of use and in good weather. Passively programmed open spaces will be visited during peak weekday midday hours and actively programmed open spaces (or actively programmed portions of open spaces that have both active and passive open space resources) will be visited during both weekday midday and peak weekend hours. Acreages of these facilities will be determined and the total study area acreages will be calculated. The percentage of active and passive open space will also be calculated.
- Based on the inventory of facilities and study area populations, total, active, and passive open space ratios will be calculated for the residential population and compared to City guidelines to assess adequacy. Open space ratios are expressed as the amount of open space acreage (total, passive, and active) per 1,000 user population.
- Expected changes in future levels of open space supply and demand in the analysis year will be assessed, based on other planned development projects within the open space study areas. Any new open space or recreational facilities that are anticipated to be operational by the analysis year will also be accounted for. Open space ratios will be calculated for the No Action condition and compared with exiting ratios to determine changes in future levels of adequacy.
- Effects on open space supply and demand resulting from increased residential populations added under the RWCDS associated with the Proposed Actions will be assessed. The assessment of the Proposed Actions' impacts will be based on a comparison of open space ratios for the No Action versus With Action conditions. In addition to the quantitative analysis, a qualitative analysis will be performed to determine if the changes resulting from the

Proposed Actions constitute a substantial change (positive or negative) or an adverse effect to open space conditions. The qualitative analysis will assess whether or not the study areas are sufficiently served by open space, given the type (active vs. passive), capacity, condition, and distribution of open space, and the profile of the study area populations.

TASK 6. SHADOWS

A shadows analysis assesses whether new structures resulting from a proposed action would cast shadows on sunlight-sensitive publicly accessible resources or other resources of concern, such as natural resources, and to assess the significance of their impact. This chapter will examine the Proposed Actions' potential for significant and adverse shadow impacts. Generally, an analysis is conducted if an action would result in new structures or additions to buildings resulting in structures over 50 feet in height that could cast shadows on important natural features, publicly accessible open space, or on historic features that are dependent on sunlight. New construction or building additions resulting in incremental height changes of less than 50 feet can also potentially result in shadow impacts if they are located adjacent to, or across the street from, a sunlight-sensitive resource.

The Proposed Actions would permit development of buildings greater than 50 feet in height and therefore has the potential to result in shadow impacts. The EIS will assess the RWCDS on a site-specific basis for potential shadowing effects of new developments at both the projected and potential development sites on sunlight-sensitive uses and disclose the range of shadow impacts, if any, which are likely to result from the Proposed Actions. The shadows analysis in the EIS will include the following tasks:

- A preliminary shadows screening assessment will be prepared to ascertain whether the projected and potential developments' shadows may potentially reach any sunlight-sensitive resources at any time of year.
  - A Tier 1 Screening Assessment will be conducted to determine the longest shadow study area for the projected and potential developments, which is defined as 4.3 times the height of a structure (the longest shadow that would occur on December 21, the winter solstice). A base map that illustrates the locations of the projected and potential developments in relation to the sunlight-sensitive resources will be developed.
  - A Tier 2 Screening Assessment will be conducted if any portion of a sunlight-sensitive resource lies within the longest shadow study area. The Tier 2 assessment will determine the triangular area that cannot be shaded by the projected and potential developments, which in New York City is the area that lies between -108 and +108 degrees from true north.
  - If any portion of a sunlight-sensitive resource is within the area that could be potentially shaded by the projected or potential developments, a Tier 3 Screening Assessment will be conducted. The Tier 3 Screening Assessment will determine if shadows resulting from the projected and potential developments can reach a sunlight-sensitive resource through the use of three-dimensional computer modeling software with the capacity to accurately calculate shadow patterns. The model will include a three-dimensional representation of the sunlight-sensitive resource(s), a three-dimensional representation of the projected and potential development sites identified in the RWCDS, and a three-dimensional representation of the topographical information within the area to determine the extent and duration of new shadows that would be cast on sunlight-sensitive resources as a result of the Proposed Actions.

- If the screening analysis does not rule out the possibility that action-generated shadows would reach any sunlight-sensitive resources, a detailed analysis of potential shadow impacts on publicly accessible open spaces or sunlight-sensitive historic resources resulting from development in the RWCDS (both projected and potential development sites) will be provided in the EIS. The detailed shadow analysis will establish a baseline condition (No Action), which will be compared to the With Action condition to illustrate the shadows cast by existing or future buildings and distinguish the additional (incremental) shadow cast by the projected and potential developments. The detailed analysis will include the following tasks:
  - The analysis will be documented with graphics comparing shadows resulting from the No Action condition with shadows resulting from the Proposed Actions, with incremental shadow highlighted in a contrasting color.
  - A summary table listing the entry and exit times and total duration of incremental shadow on each applicable representative day for each affected resource will be provided.
  - The significance of any shadow impacts on sunlight-sensitive resources will be assessed.

TASK 7. HISTORIC AND CULTURAL RESOURCES

Historic and cultural resources include both architectural and archaeological resources. Such resources are identified as districts, buildings, structures, sites, and objects of historical, aesthetic, cultural, and archaeological importance. As the Proposed Actions would induce development that could result in new in-ground disturbance, demolition of existing buildings, and new construction, the Proposed Actions have the potential to result in impacts to archaeological and architectural resources.

Impacts on archaeological resources are considered only for projected and potential development sites where new in-ground disturbance would occur compared to No Action condition. Impacts on architectural resources are considered on the affected site and in the area surrounding identified development sites. The architectural resources study area is therefore defined as the directly affected area (i.e., the proposed rezoning area), plus a 400-foot radius, as per the guidance provided in the *CEQR Technical Manual*. Architectural resources may be directly affected through demolition and construction activities and indirectly affected through visual and contextual changes. Therefore, consistent with the *CEQR Technical Manual*, the historic and cultural resources analysis will include the following tasks.

- Provide an overview of the study area's history and land development.
- Initiate consultation with LPC to request a preliminary determination of archaeological sensitivity for any portions of the areas expected to experience subsurface disturbance. These would be the projected and potential development sites where new in-ground disturbance is expected to occur as a result of the Proposed Actions. If LPC determines that no sites are sensitive for archaeological resources, no further archaeological analysis will be required.
- Previous Phase IA Archaeological Documentary Reports prepared for portions of the Project Area will be reviewed and updated, as appropriate. If it is determined that additional sites require archaeological study, new or updated Phase 1A Archaeological Documentary Reports will be prepared for those projected and potential developments sites identified as requiring further study. The Phase 1A study will be submitted to LPC for review. The Phase 1A will include an evaluation of archaeological resources within each of the development sites of concern documenting the site history, its development and use, and the potential to host significant archaeological resources. The EIS will summarize the results of the Phase IA report.

- If any developments sites are identified as having archaeological potential in the Phase 1A report and LPC concurs, the Proposed Actions effect on those resources will be evaluated to determine if a significant adverse impact would result due to the Proposed Actions. If it is found that a significant adverse impact to archaeological resources would occur, LPC will be consulted on what, if any, mitigation measures may be available to address those impacts.
- In consultation with LPC and consistent with the guidance of the *CEQR Technical Manual*, designated architectural resources will be identified in the project and study area and include: New York City Landmarks (NYCLs), Interior Landmarks, Scenic Landmarks, New York City Historic Districts (NYCHDs); resources calendared for consideration as one of the above the by LPC; resources listed on or formally determined eligible for inclusion on the state or national registers of historic places (S/NR), or contained within a district listed on or formally determined eligible for listing on the S/NR; resources recommended by the New York State Board for listing on the S/NR; and National Historic Landmarks.
- Conduct a field survey of the project and study area to identify any properties that may meet S/NR and/or NYCL eligibility criteria but have not been designated (potential architectural resources). The field survey will be supplemented with research at relevant repositories and online sources as warranted, and information will be provided to LPC for review and determinations of significance.
- Assess the potential impacts of the Proposed Actions on any identified architectural resources, including visual and contextual changes as well as any direct physical impacts. Potential impacts will be evaluated through a comparison of the future No Action condition and future With Action condition, and a determination made as to whether any change would alter or eliminate the significant characteristics of the resource that make it important.
- If necessary, measures to avoid, minimize, or mitigate potential significant adverse impacts will be identified in consultation with LPC.

TASK 8. URBAN DESIGN AND VISUAL RESOURCES

As defined in the *CEQR Technical Manual*, urban design is the totality of components that may affect a pedestrian's experience of public space. An assessment of urban design and visual resources is appropriate when there is the potential for a pedestrian to observe, from the street level, a physical alteration beyond that allowed by existing zoning. When an action would potentially obstruct view corridors, compete with icons in the skyline, or would result in substantial alterations to the streetscape of the neighborhood by noticeably changing the scale of buildings, a more detailed analysis of urban design and visual resources would be appropriate. The *CEQR Technical Manual* also recommends an analysis of pedestrian wind conditions for projects that result in the construction of large buildings at locations that experience high wind conditions (such as on the waterfront), which may result in an exacerbation of wind conditions due to "channelization" or "downwash" effects that may affect pedestrian safety. Based on the Proposed Actions and the location of the Special SoHo/NoHo Mixed-Use District, it is assumed that an analysis of pedestrian wind conditions is not warranted.

As the Proposed Actions would rezone some areas to allow higher density development and map new zoning districts within the study area, a preliminary assessment of urban design and visual resources will be provided in the EIS. The urban design study area will be the same as that used for the land use analysis (delineated by a ¼-mile radius from the proposed rezoning area boundary), in accordance with the *CEQR Technical Manual*. For visual resources, the view

corridors within the study area from which such resources are publicly viewable will be identified. The preliminary assessment will consist of the following:

- Based on field visits, the urban design and visual resources of the directly affected area and adjacent study area will be described using text, photographs, and other graphic material, as necessary, to identify critical features, use, bulk, form, and scale.
- In coordination with Task 2, "Land Use, Zoning, and Public Policy," the changes expected in the urban design and visual character of the study area due to known development projects in the future No Action condition will be described.
- Potential changes that could occur in the urban design character of the study area as a result of the Proposed Actions will be described. For the projected and potential development sites, the analysis will focus on general building types for the sites that are assumed for development, as well as elements such as street wall height, setback, and building envelope. Photographs and/or other graphic material will be utilized, where applicable, to assess the potential effects on urban design and visual resources, including view of/to resources of visual or historic significance.

A detailed analysis in accordance with *CEQR Technical Manual* guidelines will be prepared if warranted based on the preliminary assessment. Examples of projects that may require a detailed analysis are those that would make substantial alterations to the streetscape of a neighborhood by noticeably changing the scale of buildings, potentially obstruct view corridors, or compete with icons in the skyline. The detailed analysis would describe the projected and potential development sites and the urban design and visual resources of the surrounding area. The analysis would describe the potential changes that could occur to urban design and visual resources in the With Action condition, in comparison with the No Action condition, focusing on the changes that could negatively affect a pedestrian's experience of the area. If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

TASK 9. NATURAL RESOURCES

Under CEQR, a natural resource is defined as the City's biodiversity (plants, wildlife, and other organisms); any aquatic or terrestrial areas capable of providing suitable habitat to sustain the life processes of plants, wildlife, and other organisms; and any areas capable of functioning in support of the ecological systems that maintain the City's environmental stability. Such resources include groundwater, soils, and geologic features; numerous types of natural and human-created aquatic and terrestrial habitats (including wetlands, dunes, beaches, grasslands, woodlands, landscaped areas, gardens, parks, and built structures); as well as any areas used by wildlife. The EIS will include an analysis of natural resources following CEQR guidance, as described below. Much of the Project Area and surrounding area has been developed with buildings and paved surfaces. As such, vegetation is limited and there is minimal habitat to support native wildlife. Therefore, the study area for the natural resources assessment will consist of the Project Area.

The natural resources assessment will characterize existing resources in the study area, including terrestrial natural resources (e.g., plants and wildlife), threatened, endangered, and special concern species, floodplains, and groundwater resources based on existing information and results of site reconnaissance, such as the following:

- Existing information identified in peer reviewed literature;
- U.S. Geological Survey (USGS) maps, including groundwater maps;
- Soil Survey Geographic Database (SSURGO) Soils maps;

- DEC Tidal and Freshwater Wetlands and streams maps;
- U.S. Fish & Wildlife Service (USFWS) National Wetland Inventory maps;
- Federal Emergency Management Agency (FEMA) Preliminary Flood Insurance Rate Maps (FIRM);
- New York State Breeding Bird Atlas, 2000–2005;
- New York State Amphibian & Reptile Atlas Project (Herp Atlas), 1990–1999;
- New York Natural Heritage Program (NYNHP) database for state threatened, endangered, and special concern species;
- USFWS Information, Planning and Consultation (IPaC) Database for federally threatened and endangered species; and
- Results of a site reconnaissance conducted within the study area to document existing ecological conditions in the study area. The site reconnaissance will identify and characterize existing resources in the study area.

The future conditions for the natural resources within the Project Area in the No Action condition will be described in the EIS as the baseline condition. The potential effects of the Proposed Actions on natural resources, in comparison with the No Action condition, will be assessed including impacts on groundwater, floodplains, wetlands, terrestrial resources, and protected species. The assessment will consider the potential short-term and long-term impacts of development anticipated under the reasonable worst-case development scenario associated with the Proposed Actions, including beneficial impacts to wildlife from any landscaping and establishment of street trees that would be implemented as part of the Proposed Actions and will include recommended measures to minimize adverse impacts to existing natural resources and to enhance resources with the Proposed Actions.

TASK 10. HAZARDOUS MATERIALS

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

The hazardous materials assessment will determine which, if any, of the Proposed Actions' projected and potential development sites may have been adversely affected by present or historical uses at or adjacent to the sites. For some proposed projects (e.g., area-wide rezonings), portions of the typical scope for a Phase I Environmental Site Assessment (ESA), such as site inspections, may not be possible. The Proposed Actions include an area-wide rezoning, and nearly all of the identified projected and potential development sites are not in City ownership. As such, a preliminary screening assessment will be conducted for the projected and potential development

sites to determine which sites warrant an institutional control, such as an (E) Designation[5] in accordance with Section 11-15 (Environmental Requirements) of the ZR of the City of New York and Chapter 24 of Title 15 of the Rules of the City of New York governing the placement of (E) Designations. According to the Mayor's Office of Environmental Remediation (OER) NYC Searchable Property Environmental E-Database (SPEED 2.0), E-Designations have been mapped within the Project Area, and include: 53 Greene Street (E-293); 146 Wooster Street (E-369); 432 Broome Street (E-331); 155 Mercer Street (E-338); 140 Crosby Street (E-339); 298 Lafayette Street (E-323); 25 Bleecker Street (E-517); and 68 Spring Street (E-445).

The hazardous materials assessment will include the following tasks:

- Review existing information sources such as Sanborn Fire Insurance Maps and City directories for the projected and potential development sites and the surrounding area, to develop a profile of the historical uses of properties;
- Review and evaluate relevant existing data to assess the potential for environmental concerns on the projected and potential development sites and new open space; and
- Prepare a summary of findings and conclusions for inclusion in the EIS to determine where (E) Designations or comparable restrictions may be appropriate.

TASK 11. WATER AND SEWER INFRASTRUCTURE

The water and sewer infrastructure assessment determines whether a proposed action may adversely affect the City's water distribution or sewer system and, if so, assesses the effects of a proposed action to determine whether its impact is significant. The *CEQR Technical Manual* outlines thresholds for analysis of an action's water demand and its generation of wastewater and stormwater. For the Proposed Actions, an analysis of water supply is not warranted as the RWCDS associated with the Proposed Actions is not expected to result in a water demand of more than one million gallons per day (mgpd) compared with the No Action condition. A preliminary assessment of the Proposed Actions' effects on wastewater and stormwater infrastructure is warranted because the Proposed Actions are expected to result in more than 1,000 DUs, the applicable threshold for combined sewer areas in Manhattan. Therefore, the DEIS will analyze the Proposed Actions' potential effects on wastewater and stormwater infrastructure and will consider the potential for significant adverse impacts. DEP will be consulted in the preparation of this assessment.

WASTEWATER AND STORMWATER INFRASTRUCTURE

- The appropriate study area for the assessment will be established in consultation with DEP.
- The existing stormwater drainage system and surfaces (pervious or impervious) on the projected development sites will be described, and the amount of stormwater generated on those sites will be estimated using DEP's volume calculation worksheet.
- The existing sewer system serving the rezoning area will be described based on records obtained from DEP. The existing flows to the wastewater treatment plant (WWTP) which serves the Project Area will be obtained for the latest 12-month period for which data is available, and the average dry weather monthly flow will be presented.

[5] A hazardous materials (E) Designation is an institutional control that can be placed as a result of the CEQR review of a zoning map or zoning text amendment or action pursuant to the Zoning Resolution. It provides a mechanism to ensure that testing for and mitigation and/or remediation of hazardous materials, if necessary, are completed prior to, or as part of, future development of the affected site, thereby eliminating the potential for a hazardous materials impact.

- Based on coordination with DEP, changes to the stormwater drainage plan, sewer system, and surface area expected in the No Action condition will be described, as warranted.
- Future stormwater generation from the projected development sites will be assessed in accordance with the *CEQR Technical Manual*. Changes to the projected development sites' surface area will be described, runoff coefficients and runoff for each surface type/area will be presented, and volume and peak discharge rates from the sites will be determined based on the DEP volume calculation worksheet.
- Sanitary sewage generation for the projected development sites identified in the RWCDS will also be estimated. The effects of the incremental demand on the system will be assessed to determine if there will be any impact on the sewage conveyance system and/or the operations of the WWTP serving the Project Area.

TASK 12. SOLID WASTE AND SANITATION SERVICES

A solid waste assessment determines whether an action has the potential to cause a substantial increase in solid waste production that may overburden available waste management capacity or otherwise be inconsistent with the City's Solid Waste Management Plan or with State policy related to the City's integrated solid waste management system. The Proposed Actions would induce new development that would require sanitation services. If a project's generation of solid waste in the With Action condition would not exceed 50 tons per week, it may be assumed that there would be sufficient public or private carting and transfer station capacity in the metropolitan area to absorb the increment, and further analysis generally would not be required. As the Proposed Actions are expected to result in a net increase of more than 50 tons per week, compared with the No Action condition, an assessment of solid waste and sanitation services is warranted. This chapter will provide an estimate of the additional solid waste expected to be generated by the projected development sites under the RWCDS and assesses its effects on the City's solid waste and sanitation services. This assessment will do the following:

- Describe existing and future New York City solid waste disposal practices.
- Estimate solid waste generation by the RWCDS projected development sites for existing, No Action, and With Action conditions.
- Assess the impacts of the Proposed Actions' solid waste generation (projected developments) on the City's collection needs and disposal capacity. The Proposed Actions' consistency with the City's Solid Waste Management Plan will also be assessed.

TASK 13. ENERGY

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

An analysis of the anticipated additional demand from the Proposed Actions' RWCDS will be provided in the EIS. National Grid will be consulted in preparation of the energy impact analysis. The EIS will disclose the projected amount of energy consumption during long-term operation resulting from the Proposed Actions. The projected amount of energy consumption during long-term operation will be estimated based on the average and annual whole-building energy use rates

for New York City. If warranted, the Mayor's Office of Sustainability (MOS) and/or the power utility serving the area will be consulted.

TASK 14. TRANSPORTATION

The objective of a transportation analysis is to determine whether a proposed action may have a potential significant impact on traffic operations and mobility, public transportation facilities and services, pedestrian elements and flow, the safety of all roadway users (pedestrians, bicyclists, and motorists), on-and off-street parking, or goods movement. The Proposed Actions are expected to induce new residential, commercial, and community facility development, which would generate additional vehicular travel and demand for parking, as well as additional subway and bus riders and pedestrian traffic. These new trips have the potential to affect the area's transportation systems. Therefore, the transportation studies will be a key focus of the EIS.

TRAVEL DEMAND AND SCREENING ASSESSMENT

A detailed travel demand forecast has been prepared for the RWCDS using standard sources, including the *CEQR Technical Manual*, U.S. Census data, previously approved studies, and other references. The travel demand forecast (a Level 1 screening assessment) is summarized by peak hour and, mode of travel, as well as by person and vehicle trips. The travel demand forecast also identifies the number of peak hour person trips made by transit and the numbers of pedestrian trips traversing the area's sidewalks, corner areas, and crosswalks. The results of this forecast will be summarized in a Transportation Planning Factors and Travel Demand Forecast (TPF/TDF) Technical Memorandum. In addition to the travel demand forecast, detailed vehicle, pedestrian, and transit trip assignments (a Level 2 screening assessment) will be prepared to validate the intersections and pedestrian/transit elements selected for quantified analysis. Based on preliminary data, it is expected that the travel demand and screening assessment will require up to 25 intersections for analysis (4 peak periods); transit analysis at up to 4 subway stations; pedestrian analyses for up to 150 pedestrian elements (sidewalks, corners, and crosswalks); and detailed on- and off-street parking.

TRAFFIC

The EIS will provide a detailed traffic analysis focusing on those peak hours and street network intersections where the highest concentrations of action-generated demand would occur. The peak hours for analysis will be selected, and the specific intersections to be included in the traffic study area will be determined based upon the assignment of project-generated traffic and the *CEQR Technical Manual* guidance for selecting study locations.

The RWCDS is expected to exceed the minimum development density screening thresholds for a transportation analysis specified in Table 16-1 of the *CEQR Technical Manual*. Therefore, a travel demand forecast is required to determine if the Proposed Actions would generate 50 or more vehicle trips in any peak hour. Based on preliminary assumptions, the Proposed Actions are expected to generate more than 50 additional vehicular trips in 4 peak hour periods. Based on preliminary assumptions as well as prior experience with similar projects, this proposal assumes that the traffic study area would include up to approximately 25 intersections for analysis. These intersections are expected to be primarily concentrated along the key corridors within the study area.

The following outlines the anticipated scope of work for conducting a traffic impact analysis for the Proposed Actions' RWCDS:

- Select peak hours for analysis and define a traffic study area consisting of intersections to be analyzed within and in proximity to the rezoning area and along key routes leading to and from the rezoning area.
- Conduct a count program for traffic analysis locations in accordance with the New York City Department of Transportation's (DOT) October 1, 2020 data collection guidance. This count program, which will be developed in consultation with the lead agency and DOT, will likely include a mix of automatic traffic recorder (ATR) machine counts and intersection turning movement counts, along with vehicle classification counts and travel time studies (speed runs) as support data for air quality and noise analyses. Per *CEQR Technical Manual* guidelines, turning movement count data will be collected at each analyzed intersection during the weekday and Saturday peak hours, and will be supplemented by nine days of continuous ATR counts. Detailed vehicle classification count data will be collected during each peak hour at several representative intersections along each of the principal corridors in the study area. The turning movement counts, vehicle classification counts and travel time studies will be conducted concurrently with the ATR counts. Where applicable, available information from recent studies in the vicinity of the study area will be compiled, including data from such agencies as DOT and DCP.
- Inventory physical and operational characteristics at each analyzed intersection, including street widths, number of traffic lanes and lane widths, pavement markings, turn prohibitions, bicycle routes and curbside parking regulations. Signal phasing and timing data for each signalized intersection included in the analysis will be obtained from DOT.
- Determine existing traffic conditions at each analysis intersection including capacities, volume-to-capacity (v/c) ratios, average vehicle delays, and levels of service (LOS) per lane group, per intersection approach, and per overall intersection. The methodology and software to be used for the analysis will be determined in consultation with the lead agency and DOT.
- Based on available sources, Census data and standard references including the *CEQR Technical Manual*, estimate the travel demand from projected development sites in the future without the Proposed Actions (the No Action condition), as well as the demand from other major developments planned in the vicinity of the study area by the analysis year. This will include total daily and peak hour person and vehicular trips, and the distribution of trips by auto, taxi, and other modes. A truck trip generation forecast will also be prepared based on data from the *CEQR Technical Manual* and previous relevant studies. Mitigation measures accepted for all No Action projects as well as other DOT initiatives, if any, will be included in the future No Action network, as applicable.
- Compute the future No Action traffic volumes based on approved background traffic growth rates for the study area (0.50 percent per year for years one through five, 0.25 percent for years six and beyond, per *CEQR Technical Manual* guidelines) and demand from major development projects expected to be completed in the future without the Proposed Actions. Incorporate any planned changes to the roadway system anticipated by the analysis year, and determine the No Action v/c ratios, delays, and levels of services at analyzed intersections.
- Based on available secondary sources, Census data, and standard references including the *CEQR Technical Manual*, develop a travel demand forecast for projected development sites based on the net change in uses compared to the No Action condition as defined in the RWCDS. Determine the net change in vehicle trips expected to be generated by projected development sites under the Proposed Actions as described in the TPF/TDF technical memorandum and approved by DCP in consultation with DOT. Assign the net project-

generated trips in each analysis period to likely approach and departure routes, and prepare traffic volume networks for the future with the Proposed Actions (With Action) condition for each analyzed peak hour.

- Determine the v/c ratios, delays, and LOS at analyzed intersections for the With Action condition, and identify significant adverse traffic impacts in accordance with *CEQR Technical Manual* criteria.

Identify and evaluate potential traffic mitigation measures, as appropriate, for all significantly impacted locations in the study area in consultation with the lead agency and DOT. The need for implementation of some mitigation measures prior to the 2031 analysis year will also be assessed. Potential traffic mitigation could include both operational and physical measures such as changes to lane striping, curbside parking regulations and traffic signal timing and phasing, and the installation of new traffic signals. Where impacts cannot be mitigated, they will be described as unavoidable adverse impacts.

TRANSIT

The *CEQR Technical Manual* indicates that if a proposed action would result in 50 or more bus trips being assigned to a single bus line (in one direction), or if it would result in an increase of 200 or more trips at a single subway station or on a single subway line, a detailed bus or subway analysis would be warranted. The RWCDS is expected to generate a net increase of more than 200 additional subway trips and bus trips in one or more peak hours, and would therefore require detailed transit analyses based on *CEQR Technical Manual* criteria.

Transit analyses typically focus on the weekday AM and PM commuter peak hours when overall demand on the subway and bus systems is usually highest. The detailed transit analyses will include the following subtasks:

- Identify for analysis those subway stations expected to be utilized by 200 or more incremental trips in one or more peak hours. At each of these stations, analyze those stairways and entrance fare control elements expected to be used by significant concentrations of action-generated demand in the weekday AM and PM peak hours.
- Conduct counts of existing weekday AM and PM peak hour demand at analyzed subway station elements and determine existing v/c ratios and levels of service based on *CEQR Technical Manual* criteria. Given the current changes in travel behavior due to the COVID-19 pandemic, there will be coordination with the Metropolitan Transportation Authority-New York City Transit (MTA-NYCT) to determine adjustment factors to estimate normal peak hour conditions at these stations.
- Determine volumes and conditions at analyzed subway station elements in the future without the Proposed Actions using approved background growth rates and accounting for any trips expected to be generated by No Action development on projected development sites or other major projects in the vicinity of the study area.
- Add action-generated demand to the No Action volumes at analyzed subway station elements and determine AM and PM peak hour volumes and conditions in the future with the Proposed Actions.
- Identify potential significant adverse impacts at subway station stairways and fare control elements based on *CEQR Technical Manual* impact criteria.

- As the Proposed Actions are expected to generate 200 or more new subway trips in one direction on one or more of the multiple subway routes serving the area, subway line haul conditions will also be assessed in the EIS.
- Mitigation needs and potential subway station improvements will be identified, as appropriate, in conjunction with the lead agency and NYCT. Where impacts cannot be mitigated, they will be described as unavoidable adverse impacts.

The SoHo/NoHo area is also is served by a number of local bus routes operated by NYCT. A detailed analysis of bus conditions is generally not required if a proposed action is projected to result in fewer than 50 peak hour trips being assigned to a single bus route (in one direction) based on the general thresholds used by NYCT and cited in the *CEQR Technical Manual*. If the incremental person-trips by bus generated by the Proposed Actions would exceed 50 peak hour trips in one direction on one or more of the routes serving the project area, the EIS will include a quantitative analysis of local bus conditions. For that analysis, trips will be assigned to each route based on proximity to the projected development sites and current ridership patterns. The analysis will include documenting existing peak hour bus service levels and maximum load point ridership, determining conditions in the future No Action condition, and assessing the effects of new action-generated peak hour trips. Bus transit mitigation, if warranted, will be identified in consultation with the lead agency and NYCT.

PEDESTRIANS

It is anticipated that project-generated pedestrian trips would exceed the 200-trip *CEQR Technical Manual* analysis threshold at one or more locations in one or more peak hours. A detailed pedestrian analysis will therefore be prepared for the EIS focusing on selected sidewalks, corner areas, and crosswalks along corridors that would experience more than 200 additional peak hour pedestrian trips. To determine existing levels of service, pedestrian counts will be conducted at each analysis location in accordance with DOT's October 1, 2020 data collection guidance, and in consultation with the lead agency and DOT. No Action and With Action pedestrian volumes and levels of service will be determined based on approved background growth rates, trips expected to be generated by No Action development on projected development sites and other major projects in the vicinity of the study area, and action-generated demand. In addition, a citywide plan to improve the pedestrian network is currently being developed by DOT. This plan will also be considered when developing the No Action and With Action pedestrian networks, in consultation with the lead agency and DOT. The specific pedestrian facilities to be analyzed will be determined in consultation with the lead agency once the assignment of action-generated pedestrian trips has been finalized. The analysis, which will be conducted in accordance with DOT-approved methodologies, will evaluate the potential for incremental demand from the Proposed Actions to result in significant adverse impacts based on current *CEQR Technical Manual* criteria. Potential measures to mitigate any significant adverse pedestrian impacts will be identified and evaluated, as warranted, in consultation with the lead agency and DOT.

Vehicular and Pedestrian Safety

The assessment of vehicular and pedestrian safety will identify any study area intersections that are located within Senior Pedestrian Focus Areas, or that are classified as priority intersections or located within priority corridors or areas as defined under the city's *Vision Zero* initiative. Data on traffic crashes involving pedestrians and/or cyclists at study area intersections will be obtained from DOT for the most recent three-year period available. These data will be analyzed to determine if any of the studied locations may be classified (based on *CEQR Technical Manual*

criteria) as high crash locations and whether vehicle and/or pedestrian trips and any street network changes resulting from the Proposed Actions would adversely affect vehicular and pedestrian safety in the area. If any high crash locations are identified, feasible improvement measures will be explored to alleviate potential safety issues.

Parking

Parking demand from commercial (non-restaurant) and community facility uses typically peaks in the midday period and declines during the afternoon and evening. By contrast, residential demand typically peaks in the overnight period.

It is anticipated that any on-site accessory parking for projected development sites may not be sufficient to accommodate overall incremental demand. As such, detailed existing on-street parking and off-street parking inventories will be conducted for the weekday overnight period (when residential parking demand typically peaks) and the weekday midday period (when retail parking is typically at peak occupancy) to document existing supply and demand for each period. The parking analyses will document changes in the parking utilization in proximity to projected development sites under the No Action and With Action conditions based on accepted background growth rates and projected demand from No Action and With Action development on projected development sites and other major projects in the vicinity of the study area. Parking utilization within the rezoning area, as well as within ¼-mile of the rezoning area, will be analyzed.

Parking demand generated by the projected residential component of RWCDS will be forecasted based on auto ownership data for the rezoning area and the surrounding area. Parking demand from all other uses will be derived from the forecasts of daily auto trips generated by these uses. Future parking demand will account for net reductions in demand associated with the projected development sites' No Action land uses displaced under the Proposed Action.

The forecast of new parking supply under the RWCDS will reflect any change in parking spaces on projected development sites. Pursuant to MIH regulations, it is assumed that no accessory parking would be provided for affordable units developed in the With Action condition. Future supply will also account for any accessory parking spaces associated with the With Action commercial uses, which have lower commercial demand in the overnight hours.

TASK 15. AIR QUALITY

An air quality assessment is required for actions that could have potential to result in significant air quality impacts. There are mobile source impacts that could arise when an action increases or causes a redistribution of traffic, creates any other mobile sources of pollutants, or adds new uses near existing mobile sources. Mobile source impacts could also result from parking facilities, parking lots, or garages. Stationary source impacts could occur with actions that create new stationary sources or pollutants such as emission stacks from industrial plants, hospitals, or other large institutional uses, or a building's boilers, that can affect surrounding uses; or when they add uses near existing or planned future emission stacks, and the new uses might be affected by the emissions from the stacks, or when they add structures near such stacks and those structures can change the dispersion of emissions from stacks so that they begin to affect surrounding uses.

MOBILE SOURCE ANALYSIS

The increased traffic associated with the RWCDS projected development sites would have the potential to affect local air quality levels. Emissions generated by the increased traffic at congested intersections have the potential to affect air quality significantly at nearby sensitive land uses. Carbon monoxide (CO) and particulate matter (PM) are the primary pollutants of concern for

microscale mobile source air quality analyses, including assessments of roadways intersections and parking garages. There is the potential for the action-generated trips to exceed the *CEQR Technical Manual* CO analysis screening threshold at a number of locations throughout the study area. In addition, the projected number of heavy-duty trucks or equivalent vehicles associated with the RWCDS could exceed the applicable fine particulate matter ($PM_{2.5}$) screening thresholds. Therefore, an analysis of CO and PM mobile source emissions at affected intersections may be warranted.

The specific work program for the mobile source air quality study will include the following tasks:

- Existing ambient air quality data for the study area (published by DEC) will be compiled for the analysis of existing and future conditions.
- Critical intersection locations exceeding the CO and PM CEQR screening thresholds will be selected, representing locations with the worst potential total and incremental pollution impacts, based on data obtained from the traffic analysis. At each intersection, multiple receptor sites will be analyzed in accordance with *CEQR Technical Manual* guidelines.
- Vehicular cruise and idle emissions for the dispersions modeling will be computed using EPA's MOVES model. Factors for re-suspended road dust emissions will be based on *CEQR Technical Manual* guidance and the EPA procedure defined in AP-42.
- The refined U.S. Environmental Protection Agency (EPA) AERMOD model is proposed to predict the maximum change in CO and $PM_{2.5}$ concentrations, consistent with current EPA modeling guidance.
- At each mobile source microscale receptor site, the one-hour and eight-hour average CO concentrations will be calculated for each applicable peak period for existing, No Action, and With Action condition; and the maximum 24-hour and annual average $PM_{2.5}$ concentrations will be calculated for the No Action and With Action conditions.
- Future pollutant levels with the Proposed Actions will be compared with the National Ambient Air Quality Standards (NAAQS) and the City's CO and $PM_{2.5}$ *de minimis* guidance criteria to determine the impacts of the Proposed Actions.
- At any receptor sites where violations of standards occur, analyses will be performed to determine what mitigation measures would be required to attain standards.

STATIONARY SOURCE ANALYSIS

The stationary source air quality analysis will determine the effects of emissions from projected and potential development sites fossil fuel fired heating and hot water systems to affect existing land uses significantly (i.e. project-on-existing) or to significantly affect any of the other projected or potential development sites (i.e., project-on-project impacts). In addition, since portions of the rezoning area are located within or near manufacturing zoned districts, an analysis of emissions from industrial sources will be performed within 400 feet of the study area. In addition, an analysis will be conducted to examine large and major sources of emissions within 1,000 feet of the study area.

Heat and Hot Water Systems Analysis

- A screening level analysis will be performed to determine the potential for impacts air quality impacts from heating and hot water systems of the projected and potential development sites.
- If the screening analysis for any site demonstrates a potential for air quality impacts, a refined modeling analysis will be performed for that development site using the AERMOD model.

For this analysis, five recent years of DEC provided meteorological data from LaGuardia Airport and concurrent upper air data from Brookhaven, New York will be utilized for the simulation program. Concentrations of nitrogen dioxide (NO_2), sulfur dioxide (SO_2) if No. 2 fuel oil is fired, and particulate matter (PM_{10} and $PM_{2.5}$) will be determined at off-site receptors sites, as well as on projected and potential development site receptors. Predicted values will be compared with NAAQS and the City's CO and $PM_{2.5}$ *de minimis* guidance criteria. If warranted by the analysis, requirements related to fuel type, exhaust stack locations, and/or other appropriate parameters will be memorialized by (E) Designations placed on the blocks and lots pursuant to Section 11-15 of the New York City ZR and the (E) Rules, as referenced above in the Hazardous Materials section.

- A cumulative impact analysis will be performed for development sites with similar height located in close proximity to one another (i.e., site clusters). Impacts will be determined using the EPA AERSCREEN model, and if potential air quality impacts are identified, using the refined AERMOD model. In the event that violations of standards are predicted, measures to reduce pollutant levels to within standards will be examined.

Industrial Source Analysis

- A field survey will be performed to identify processing or manufacturing facilities within 400 feet of the projected and potential development sites. A copy of the air permits for each of these facilities will be requested from DEP's Bureau of Environmental Compliance.
- Light manufacturing facilities with sources of emissions located within 400 feet of the projected or potential development sites will be considered for analysis.
- For potential development sites with identified industrial sources of air emissions, the industrial sources analysis will be performed assuming that development does take place, as well as assuming that it does not take place.
- A cumulative impact analysis will be performed for multiple sources that emit the same air contaminant. Predicted concentrations of these compounds will be compared to DEC DAR-1 guideline values for short-term (SGC) and annual (AGC) averaging periods. In the event that violations of standards are predicted, measures to reduce pollutant levels to within standards will be examined.
- Potential cumulative impacts of multiple air pollutants will be determined based on DEC's DAR-1 guidance document for non-carcinogenic compounds (Hazard Index Approach) and for carcinogenic compounds (Unit Risk Factors).

Large and Major Source Analysis

- An analysis of existing large and major sources of emissions (such as sources having Federal and State permits) identified within 1,000 feet of the development sites will be performed to assess their potential effects on the projected and potential development sites. Predicted criteria pollutant concentrations will be predicted using the AERMOD model compared with NAAQS for NO_2, SO_2, and PM_{10}, as well as applicable criteria for $PM_{2.5}$.

Existing (E) Designated sites were identified within the Project Area, and include: 53 Greene Street (E-293); 476 Broome Street (E-295); 298 Lafayette Street (E-323); 688 Broadway (E-325); 321 Canal Street (E-324); 323 Canal Street (E-365); 10 Greene Street (E-402); and 40 Wooster Street (E-416).

TASK 16. GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Increased greenhouse gas (GHG) emissions are changing the global climate, which is predicted to lead to wide-ranging effects on the environment, including rising sea levels, increases in temperature, and changes in precipitation levels. Although this is occurring on a global scale, the environmental effects of climate change are also likely to be felt at the local level. As the RWCDS associated with the Proposed Actions exceeds the 350,000 sf development threshold, GHG emissions generated by the Proposed Actions will be quantified and an assessment of consistency with the City's established GHG reduction goal will be performed as part of the EIS. The assessment will examine GHG emissions from the Proposed Action's operations, mobile sources, and construction, as outlined below.

- Sources of GHG from the development projected as part of the Proposed Actions will be identified. The pollutants for analysis will be discussed, as well as various city, state, and federal goals, policies, regulations, standards, and benchmarks for GHG emissions.
- Fuel consumption will be estimated for the projected developments based on the calculations of energy use estimated as part of Task 13, "Energy."
- GHG emissions associated with the action-related traffic will be estimated for the Proposed Actions using data from Task 14, "Transportation." A calculation of vehicle miles traveled (VMT) will be prepared.
- The types of construction materials and equipment proposed will be discussed along with opportunities for alternative approaches that may serve to reduce GHG emissions associated with construction.
- A qualitative discussion of stationary and mobile sources of GHG emissions will be provided in conjunction with a discussion of goals for reducing GHG emissions to determine if the Proposed Actions are consistent with GHG reduction goals, including building efficient buildings, using clean power, transit-oriented development and sustainable transportation, reducing construction operations emissions, and using building materials with low carbon intensity.

Portions of the Project Area are located within the federally mapped 100- and 500-year floodplains and may be susceptible to storm surge and coastal flooding. This chapter of the EIS will include a qualitative discussion of potential effects of climate change and potential design measures that could be incorporated into new development projected to occur in the Project Area.

TASK 17. NOISE

The Proposed Actions would result in new residential, commercial, community facility, and industrial development. It would also alter traffic conditions in the area. Noise, which is a general term used to describe unwanted sound, will likely be affected by these development changes. A detailed noise analysis will be included in the EIS, which will examine both the Proposed Actions' potential effects on existing sensitive noise receptors (including residences, health care facilities, schools, open space, etc.) and the potential noise exposure at noise-sensitive uses newly introduced by the actions. If significant adverse impacts are identified, impacts would be mitigated or avoided to the greatest extent practicable.

It is assumed that outdoor mechanical equipment would be designed to meet applicable regulations and consequently no detailed analysis of potential noise impacts due to outdoor mechanical equipment will be performed. Consequently, the noise analysis will examine the level of building

attenuation necessary to meet CEQR interior noise level requirements. The following tasks will be performed:

- Based on the traffic studies conducted for Task 14, "Transportation," a screening analysis will be conducted to determine whether there are any locations where there is the potential for the RWCDS associated with the Proposed Actions to result in significant noise impacts (i.e., doubling Noise Passenger Car Equivalents [PCEs]) due to action-generated traffic.
- Noise analysis locations will be selected to represent sites of future sensitive uses in the RWCDS With Action condition. These noise analysis locations will be placed in areas to be analyzed for building attenuation and would focus on areas of potentially high ambient noise where noise-sensitive uses are proposed.
- At the identified locations, baseline condition noise levels will be established for the three weekday and one weekend peak hours corresponding to the analysis hours for the Traffic analysis discussed in Task 14. Due to the ongoing COVID-19 pandemic, field measurements of noise levels may not represent expected noise exposure at the proposed project. If the current traffic pattern is deemed representative, field noise measurements will be utilized to establish existing noise levels. Consequently, if the current traffic pattern is not deemed representative, "existing condition" noise levels would be established using a combination of noise levels measured within and adjacent to the rezoning area for previous environmental reviews, mathematical models, and projections of typical vehicular traffic volumes. The specific methodology and technical approach for the establishment of existing condition noise levels will be described in a memorandum submitted to the lead agency for comment and approval.
- Future No Action and With Action noise levels will be estimated at the noise receptor locations based on acoustical fundamentals. All projections will be made using the L_{eq} noise descriptor.
- As necessary, noise exposure at projected and potential development sites resulting from playgrounds within the study area will be estimated based on SCA playground noise assessment guidance, and the resultant total noise levels will be used to identify building attenuation requirements.
- The level of building attenuation necessary to satisfy CEQR noise exposure guidelines (a function of the exterior noise levels) will be determined based on the highest L_{10} noise level estimated at each noise analysis location. The building attenuation requirements will be memorialized by (E) Designations placed on the blocks and lots requiring specific levels of attenuation pursuant to Section 11-15 of the New York City ZR and the (E) Rules, as referenced above in the Hazardous Materials section. The EIS would include (E) Designation language describing the requirements for each of the blocks and lots to which they would apply.

(E) Designations are mapped within the Project Area, and include: 53 Greene Street (E-293); 476 Broome Street (E-295); 298 Lafayette Street (E-323); 688 Broadway (E-325); 432 Broome Street (E-331); 140 Crosby Street (E-339); 321 Canal Street (E-324); 323 Canal Street (E-365); and 10 Greene Street (E-402).

TASK 18. PUBLIC HEALTH

Public health is the organized effort of society to protect and improve the health and well-being of the population through monitoring; assessment and surveillance; health promotion; prevention of disease, injury, disorder, disability, and premature death; and reducing inequalities in health

status. The goal of CEQR with respect to public health is to determine whether adverse impacts on public health may occur as a result of a proposed project, and, if so, to identify measures to mitigate such effects.

A public health assessment may be warranted if an unmitigated significant adverse impact is identified in other CEQR analysis areas, such as air quality, hazardous materials, or noise. If unmitigated significant adverse impacts are identified for the Proposed Actions in any of these technical areas and DCP determines that a public health assessment is warranted, an analysis will be provided for the specific technical area or areas.

TASK 19. NEIGHBORHOOD CHARACTER

The character of a neighborhood is established by numerous factors, including land use patterns, the scale of its development, the design of its buildings, the presence of notable landmarks, and a variety of other physical features that include traffic and pedestrian patterns, noise, etc. The Proposed Actions have the potential to alter certain elements contributing to the affected area's neighborhood character. Therefore, a neighborhood character analysis will be provided in the EIS.

A preliminary assessment of neighborhood character will be provided in the EIS to determine whether changes expected in other technical analysis areas—land use, zoning, and public policy; socioeconomic conditions; open space; historic and cultural resources; urban design and visual resources; transportation; and noise—may affect a defining feature of neighborhood character. The preliminary assessment will:

- Identify the defining features of the existing neighborhood character.
- Summarize changes in the character of the neighborhood that can be expected in the With Action condition and compare to the No Action condition.
- Evaluate whether the Proposed Actions have the potential to affect these defining features, either through the potential for a significant adverse impact or a combination of moderate effects in the relevant technical areas.

If the preliminary assessment determines that the Proposed Actions could affect the defining features of neighborhood character, a detailed analysis will be conducted.

TASK 20. CONSTRUCTION

Construction impacts, though temporary, can have a disruptive and noticeable effect on the adjacent community, as well as people passing through the area. Construction impacts are usually important when construction activity has the potential to affect transportation conditions, archaeological resources and the integrity of historic resources, community noise patterns, air quality conditions, and mitigation of hazardous materials. Multi-sited projects with overall construction periods lasting longer than two years and that are near to sensitive receptors should undergo a preliminary impact assessment. This chapter of the EIS will provide a preliminary impact assessment following the guidelines in the *CEQR Technical Manual* based on a conceptual construction schedule with anticipated RWCDS construction timelines for each of the projected development sites. The preliminary assessment will evaluate the duration and severity of the disruption or inconvenience to nearby sensitive receptors. If the preliminary assessment indicates the potential for a significant impact during construction, a detailed construction impact analysis will be undertaken and reported in the EIS in accordance with guidelines outlined in the *CEQR Technical Manual*. Technical areas to be assessed include the following:

- *Transportation Systems:* The assessment will qualitatively consider losses in lanes, sidewalks, and other transportation services on the adjacent streets during the various phases of construction and identify the increase in vehicle trips from construction workers and equipment. A travel demand forecast for the peak construction period will be prepared.
- *Air Quality:* The construction air quality impact section will include a quantitative dispersion modeling of construction equipment operational impacts on sensitive land uses within the Project Area during the worst-case time period(s). Air pollutant sources will include combustion exhaust associated with non-road engines, on-road engines, and on-site activities that generate fugitive dust. A discussion of measures to reduce impacts, if any, will be included.
- *Noise:* The construction noise impact section will contain discussion of noise impacts at sensitive land uses and buildings within the Project Area to be analyzed with a quantitative noise modeling for the worst-case noise condition from on-site construction equipment/vehicles activity. During the most representative worst-case time period(s), noise levels due to construction activities at sensitive receptors will be predicted and duration of sustained noise levels exceeding the significance threshold will be estimated.
- *Other Technical Areas:* As appropriate, other areas of environmental assessment—such as historic resources, hazardous materials, public health, socioeconomic conditions, and neighborhood character—will be analyzed for potential construction-related impacts.

TASK 21. MITIGATION

Where significant adverse impacts have been identified in Tasks 2 through 20, measures to mitigate those impacts will be described. The chapter will also consider when mitigation measures will need to be implemented. These measures will be developed and coordinated with the responsible government agencies, as appropriate. Where impacts cannot be fully mitigated, they will be described as unavoidable adverse impacts.

TASK 22. ALTERNATIVES

The purpose of an alternatives chapter in an EIS is to examine development options that would tend to reduce action-related impacts. The alternatives will be better defined once the full extent of the Proposed Actions' impacts have been identified. Typically for area-wide actions such as the Proposed Actions, the alternatives will include a No Action Alternative, a no impact or no unmitigated significant adverse impact alternative, and a lesser density alternative. A lesser density alternative would be pursued only if it is found to have the potential to reduce the impacts of the Proposed Actions while, to some extent, still meeting the action's stated purpose and need. The alternatives analysis will be qualitative, except in those technical areas where significant adverse impacts for the Proposed Actions have been identified. The level of analysis provided will depend on an assessment of project impacts determined by the analysis connected with the appropriate tasks.

TASK 23. SUMMARY EIS CHAPTERS

The EIS will include the following three summary chapters, where appropriate to the Proposed Action:

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

- *Growth-Inducing Aspects of the Proposed Action*: which generally refer to "secondary" impacts of the Proposed Actions that trigger further development.
- *Irreversible and Irretrievable Commitments of Resources*: which summarizes the Proposed Actions and their impact in terms of the loss of environmental resources (loss of vegetation, use of fossil fuels and materials for construction, etc.), both in the immediate future and over the long term.

TASK 24. EXECUTIVE SUMMARY

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

Appendix 1

SoHo/NoHo Neighborhood Plan RWCDS Table 1: Existing and No Action Development

DSOW ID	BBL	Lot Count	Zoning Lot Area	Existing Zoning	Proposed Zoning	Group	Residential ZFA		Residential GFA		Local Retail ZFA		Local Retail GFA		Office ZFA		Office GFA		Commercial Other ZFA		Commercial Other GFA		Commercial ZFA		Commercial GFA		Warehouse ZFA		Warehouse GFA		Industrial ZFA		Industrial GFA		Manufacturing ZFA		Manufacturing GFA		Total ZFA		Total GFA		Residential FAR		Commercial FAR		Manufacturing FAR		Total FAR		Residential Units		Residential Units @ 20% Affordable		Residential Units @ 25% Affordable		Residential Units @ 30% Affordable		Total Bicycle Parking Required		Bicycle Parking Required GFA	
1	1005310041, 1005310042	2	4944	M1-5B	M1-5R10A	Projected	7,052	8,107	3,166	3,556	0	0	0	0	0	3,166	3,556	0	0	0	0	0	0	0	0	0	0	10,218	11,663	1	1	0	0	2	2	8	4	90	4	90
2	1005310017, 1005310052, 1005310056	3	20527	M1-5B	M1-5R9X	Projected	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3	1005220041, 1005220043	2	3087	M1-5B	M1-5R9X	Projected	0	0	2,536	2,850	1,646	1,850	0	0	0	4,183	4,700	0	0	0	0	0	0	0	0	0	0	4,183	4,700	0	0	1	1	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0
4	1002340009, 1002340011	2	4548	M1-5B	M1-5R10	Projected	0	0	2,905	3,265	4,730	5,315	0	0	0	7,636	8,580	0	0	0	0	0	0	0	0	0	0	7,636	8,580	0	0	2	2	0	0	2	2	0	0	0	0	0	0	0	0	0	0	0	0
5	1002270020, 1002270022	2	6614	M1-5B	M1-5R10	Projected	0	0	6,666	7,491	0	0	0	0	0	6,666	7,491	0	0	0	0	0	0	0	0	0	0	6,666	7,491	0	0	1	1	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0
6	1002270006, 1002270007	2	4835	M1-5B	M1-5R10	Projected	0	0	7,305	8,208	0	0	0	0	0	7,305	8,208	0	0	0	0	0	0	0	0	0	0	7,305	8,208	0	0	2	2	0	0	2	2	0	0	0	0	0	0	0	0	0	0	0	0
7	1002270001, 1002270002	2	2944	M1-5A	M1-5R10	Projected	6,982	8,026	2,380	2,676	0	0	0	0	0	2,380	2,676	0	0	0	0	0	0	0	0	0	0	9,362	10,702	2	2	1	1	3	3	8	4	60	4	60
8	1002290021, 1002290026	2	10619	M1-5B	M1-5R10	Projected	0	0	9,109	10,235	14,264	16,028	0	0	0	23,373	26,263	0	0	0	0	0	0	0	0	0	0	23,373	26,263	0	0	2	2	0	0	2	2	0	0	0	0	0	0	0	0	0	0	0	0
9	1002280013, 1002280019, 1002280020	2	21348	M1-5B	M1-5R10	Projected	0	0	19,397	20,672	26,828	30,144	0	0	0	45,225	50,816	0	0	0	0	16,094	18,084	16,094	18,084	61,319	68,900	0	0	2	1	3	3	0	0	4	4	60	4	60
10	1002270005, 1002270006, 1002270007, 1002270008, 1002270010	5	13830	M1-5B	M1-5R10	Projected	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	1005400046	1	8906	M1-5B	M1-5R9X	Projected	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12	1005400048	1	8906	M1-5B	M1-5R9X	Projected	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	1005310037	1	9574	M1-5B	M1-5R10A	Projected	0	0	4,514	5,072	0	0	0	0	0	4,514	5,072	0	0	0	0	0	0	0	0	0	0	4,514	5,072	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	1005290035	1	3190	M1-5B	M1-5R10	Projected	0	0	2,564	2,882	2,564	2,882	0	0	0	5,129	5,764	0	0	0	0	0	0	0	0	0	0	5,129	5,764	0	0	2	2	0	0	2	2	0	0	0	0	0	0	0	0	0	0	0	0
15	1005100033	1	2375	M1-5B	M1-5R7X	Projected	0	0	4,450	5,000	0	0	0	0	0	4,450	5,000	0	0	0	0	0	0	0	0	0	0	4,450	5,000	0	0	2	2	0	0	2	2	0	0	0	0	0	0	0	0	0	0	0	0
16	1004980028	1	2413	M1-5A	M1-5R7X	Projected	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	1004760073	1	10183	M1-5B M1-5A	M1-5R10	Projected	0	0	0	0	0	0	34,710	39,000	34,710	39,000	0	0	0	0	0	0	0	0	0	0	0	34,710	39,000	0	0	3	3	0	0	3	3	0	0	0	0	0	0	0	0	0	0	0	0
18	1004760056	1	2770	M1-5B M1-5A	M1-5R10	Projected	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2,451	2,755	2,451	2,755	2,451	2,755	0	0	0	0	1	1	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0
19	1004760001	1	4484	M1-5B	M1-5R10	Projected	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
20	1004760081	1	2841	M1-5B	M1-5R7X	Projected	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
21	1004760082	1	2839	M1-5B	M1-5R7X	Projected	0	0	2,839	3,191	4,788	5,380	0	0	0	7,628	8,571	0	0	0	0	0	0	0	0	0	0	7,628	8,571	0	0	3	3	0	0	3	3	0	0	0	0	0	0	0	0	0	0	0	0
22	1004760083	1	3443	M1-5B	M1-5R10	Projected	0	0	2,670	3,000	12,691	14,260	0	0	0	15,361	17,260	0	0	0	0	0	0	0	0	0	0	15,361	17,260	0	0	4	4	0	0	4	4	0	0	0	0	0	0	0	0	0	0	0	0
23	1004760080	1	3424	M1-5B	M1-5R10	Projected	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
24	1002350029	1	2885	M1-5B	M1-5R10	Projected	0	0	2,839	3,191	4,788	5,380	0	0	0	7,628	8,571	0	0	0	0	0	0	0	0	0	0	7,628	8,571	0	0	3	3	0	0	3	3	0	0	0	0	0	0	0	0	0	0	0	0
25	1002380004	1	3443	M1-5B	M1-5R10	Projected	0	0	2,670	3,000	12,691	14,260	0	0	0	15,361	17,260	0	0	0	0	0	0	0	0	0	0	15,361	17,260	0	0	4	4	0	0	4	4	0	0	0	0	0	0	0	0	0	0	0	0
26	1002280001	1	3424	M1-5B	M1-5R10	Projected	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
27	1002070020	1	6265	M1-5B	M1-5R10	Projected	0	0	11,303	12,760	18,067	20,200	0	0	0	29,370	33,000	0	0	0	0	0	0	0	0	0	0	29,370	33,000	0	0	5	5	0	0	5	5	0	0	0	0	0	0	0	0	0	0	0	0
28	1004820027, 1004820028	2	5261	M1-5B	M1-5R7X	Projected	0	0	4,450	5,000	3,560	4,000	0	0	0	8,010	9,000	0	0	0	0	0	0	0	0	0	0	8,010	9,000	0	0	2	2	0	0	2	2	0	0	0	0	0	0	0	0	0	0	0	0
30(CV)	1005220026	1	6636	M1-5B	M1-5R9X	Projected	0	0	4,797	5,390	29,663	33,330	0	0	0	34,460	38,720	0	0	0	0	0	0	0	0	0	0	34,460	38,720	0	0	5	5	0	0	5	5	0	0	0	0	0	0	0	0	0	0	0	0
31(CV)	1004960040	1	6222	M1-5B	M1-5R9X	Projected	0	0	4,984	5,600	39,338	44,200	0	0	0	44,322	49,800	4,450	5,000	0	0	4,450	5,000	48,772	54,800	0	0	7	1	8	0	0	0	0	0	4	60	4	60										
32(CV)	1004720026	1	6299	M1-5B	M1-5R9X	Projected	0	0	4,806	5,400	26,599	29,887	0	0	0	31,405	35,287	0	0	0	0	0	0	31,405	35,287	0	0	5	0	5	0	0	0	0	0	3	45	3	45										
TOTAL							14,034	16,133	99,841	112,190	184,738	207,576	34,710	39,000	319,293	358,766	4,450	5,000	18,545	20,839	22,995	25,839	358,322	400,738	4	49	2	55	16	2	4	4	16	240																		
A	1004820009	1	2497	M1-5B	M1-5R7X	Potential	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
AA	1004880030	1	3749	M1-5A	M1-5R7X	Potential	0	0	8,900	10,000	0	0	0	0	0	8,900	10,000	0	0	0	0	0	0	0	0	0	0	8,900	10,000	0	0	2	2	0	0	2	2	0	0	0	0	0	0	0	0	0	0	0	0
AAA	1002300007, 1002300008	2	3753	M1-5B	M1-5R9X	Potential	5,235	6,016	2,585	2,906	0	0	0	0	0	2,585	2,906	0	0	0	0	0	0	0	0	0	0	7,820	8,924	1	1	1	1	0	0	2	1	0	0	0	0	0	0	0	0	0	0	0	0
B	1005100007	1	2714	M1-5A	M1-5R7X	Potential	0	0	2,002	2,250	0	0	0	0	0	2,002	2,250	0	0	0	0	0	0	0	0	0	0	2,002	2,250	0	0	1	1	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0
BB	1005310003	1	6157	M1-5B	M1-5R9X	Potential	0	0	9,487	10,660	0	0	0	0	0	9,487	10,660	4,450	5,000	0	0	4,450	5,000	13,937	15,660	0	0	2	1	2	0	0	0	0	0	2	30	2	30										
BBB	1004870028, 1004870029	2	3439	M1-5A	M1-5R7X	Potential	2,066	2,375	756	850	0	0	0	0	0	756	850	0	0	0	0	0	0	2,822	3,225	0	0	1	0	1	0	0	0	0	0	1	15	1	15										
C	1004870018	1	4613	M1-5A	M1-5R7X	Potential	0	0	3,515	3,950	0	0	0	0	0	3,515	3,950	0	0	0	0	0	0	3,515	3,950	0	0	1	0	1	0	0	0	0	0	1	15	1	15										
CC	1004830029	1	1932	M1-5B	M1-5R9X	Potential	0	0	5,340	6,000	0	0	0	0	0	5,340	6,000	0	0	0	0	0	0	5,340	6,000	0	0	3	0	3	0	0	0	0	0	3	45	3	45										
CCC	1004750001, 1004750003, 1004750004	3	5496	M1-5A	M1-5R7X	Potential	0	0	12,956	14,558	0	0	0	0	0	12,956	14,558	0	0	0	0	0	0	12,956	14,558	0	0	2	0	2	0	0	0	0	0	2	30	2	30										
D	1004750059	1	2623	M1-5A	M1-5R7X	Potential	0	0	2,113	2,375	0	0	0	0	0	2,113	2,375	0	0	0	0	0	0	2,113	2,375	0	0	1	0	1	0	0	0	0	0	1	15	1	15										
DD	1005190025	1	1919	M1-5A	M1-5R7X	Potential	3,457	3,974	1,630	1,832	0	0	0	0	0	1,630	1,832	0	0	0	0	0	0	5,087	5,806	2	1	3	0	3	4	0	0	1	1	1	15	1	15										
DDD	1002290004, 1002290005	2	12416	M1-5B	M1-5R9X	Potential	0	0	3,800	4,270	0	0	32,073	36,038	35,874	40,308	2,021	2,271	2,021	2,271	37,895	42,579	3	3	6	0	3	0	0	0	0	0	0	0	3	45	3	45										
E	1004960018	1	2677	M1-5B	M1-5R7X	Potential	0	0	2,095	2,354	0	0	0	0	0	2,095	2,354	0	0	0	0	0	0	2,095	2,354	0	0	1	0	1	0	0	0	0	0	1	15	1	15										
EE	1005160034, 1005160035	2	7758	M1-5A	M1-5R9X	Potential	0	0	6,408	7,200	0	0	0	0	0	6,408	7,200	0	0	0	0	0	0	6,408	7,200	0	0	2	0	2	0	0	0	0	0	2	30	2	30										
EEE	1005440005	1	12424	M1-5B	M1-5R9X	Potential	0	0	0	0	0	0	30,256	33,996	30,256	33,996	0	0	0	0	30,256	33,996	0	0	2	0	2	0	0	0	0	0	0	0	2	30	2	30										
F	1005450014	1	3913	M1-5B	M1-5R9X	Potential	0	0	3,148	3,538	0	0	0	0	0	3,148	3,538	0	0	0	0	0	0	3,148	3,538	0	0	1	0	1	0	0	0	0	0	1	15	1	15										
FFF	1004740026	1	8300	M1-5B	M1-5R7X	Potential	0	0	6,675	7,500	26,700	30,000	0	0	0	33,375	37,500	0	0	0	0	0	0	33,375	37,500	0	0	4	0	4	0	0	0	0	0	4	60	4	60										
G	1004750019	1	3225	M1-5B	M1-5R7X	Potential	0	0	2,803	3,150	0	0	0	0	0	2,803	3,150	0	0	0	0	0	0	2,803	3,150	0	0	1	0	1	0	0	0	0	0	1	15	1	15										
GG	1004820026	1	2019	M1-5B	M1-5R7X	Potential	0	0	1,335	1,500	2,420	2,720	0	0	0	3,755	4,220	649	730	0	0	649	730	4,404	4,950	0	0	2	0	2	0	0	0	0	0	2	30	2	30										
GGG	1004840003	1	6516	M1-5B	M1-5R9X	Potential	0	0	5,440	6,113	38,083	42,791	0	0	0	43,524	48,904	0	0	0	0	0	0	43,524	48,904	0	0	7	0	7	0	0	0	0	0	4	60	4	60										
H	1004960009	1	1807	M1-5B	M1-5R7X	Potential	0	0	1,605	1,804	0	0	0	0	0	1,605	1,804	0	0	0	0	0	0	1,605	1,804	0	0	1	0	1	0	0	0	0	0	1	15	1	15										
HH	1004960006	1	2515	M1-5A	M1-5R7X	Potential	4,350	5,000	1,780	2,000	0	0	0	0	0	1,780	2,000	0	0	0	0	0	0	6,130	7,000	2	1	5	0	5	1	1	0	0	0	5	1	5	1										
I	1002290015	1	5146	M1-5B	M1-5R7X	Potential	0	0	4,628	5,200	0	0	0	0	0	4,628	5,200	0	0	0	0	0	0	4,628	5,200	0	0	1	0	1	0	0	0	0	0	1	15	1	15										
II	1002300044	1	1626	M1-5B	M1-5R9X	Potential	0	0	1,602	1,800	1,795	2,017	0	0	0	3,397	3,817	0	0	0	0	0	0	3,397	3,817	0	0	2	0	2	0	0	0	0	0	2	30	2	30										
J	1005440072	1	3397	M1-5B	M1-5R9X	Potential	0	0	0	0	0	0	3,204	3,600	3,204	3,600	0	0	0	0	3,204	3,600	0	0	1	0	1	0	0	0	0	0	0	0	1	15	1	15										
JJ	1005130033	1	2566	M1-5A	M1-5R7X	Potential	3,625	4,167	1,853	2,083	0	0	0	0	0	1,853	2,083	0	0	0	0	0	0	5,478	6,250	1	1	4	0	4	1	1	0	0	0	4	1	4	1										
K	1005140004	1	2461	M1-5A	M1-5R7X	Potential	0	0	2,225	2,500	0	0	0	0	0	2,225	2,500	0	0	0	0	0	0	2,225	2,500	0	0	1	0	1	0	0	0	0	0	1	15	1	15										
KK	1004980017	1	5631	M1-5A	M1-5R7X	Potential	0	0	11,344	12,747	0	0	0	0	0	11,344	12,747	0	0	0	0	0	0	11,344	12,747	0	0	2	0	2	0	0	0	0	0	2	30	2	30										
L	1005010003	1	2665	M1-5A	M1-5R7X	Potential	0	0	2,670	3,000	0	0	0	0	0	2,670	3,000	0	0	0	0	0	0	2,670	3,000	0	0	1	0	1	0	0	0	0	0	1	15	1	15										
LL	1004830008	1	2481	M1-5B	M1-5R9X	Potential	0	0	5,610	6,304	0	0	0	0	0	5,610	6,304	0	0	0	0	0	0	5,610	6,304	0	0	2	0	2	0	0	0	0	0	2	30	2	30										
M	1004850024	1	2494	M1-5A	M1-5R7X	Potential	0	0	2,670	3,000	0	0	0	0	0	2,670	3,000	0	0	0	0	0	0	2,670	3,000	0	0	1	0	1	0	0	0	0	0	1	15	1	15										
MM	1004740014	1	2603	M1-5B	M1-5R7X	Potential	0	0	2,142	2,407	0	0	0	0	0	3,955	4,444	3,955	4,444	0	0	3,955	4,444	6,097	6,851	0	0	1	1	2	0	0	0	0	0	2	30	2	30										
N	1005300031	1	2830	M1-5B	M1-5R7X	Potential	0	0	3,293	3,700	0	0	0	0	0	3,293	3,700	0	0	0	0	0	0	3,293	3,700	0	0	1	0	1	0	0	0	0	0	1	15	1	15										
NN	1005140024	1	2647	M1-5A	M1-5R7X	Potential	0	0	0	0	6,104	6,859	0	0	0	6,104	6,859	0	0	0	0	0	0	6,104	6,859	0	0	2	0	2	0	0	0	0	0	2	30	2	30										
O	1004747501	1	2619	M1-5B	M1-5R7X	Potential	978	1,125	2,287	2,570	0	0	0	0	0	2,287	2,570	0	0	0	0	0	0	3,265	3,695	0	0	1	0	1	1	0	0	0	0	1	15	1	15										
OO	1005130039	1	10729	M1-5A	M1-5R7X	Potential	0	0	25,306	28,434	0	0	0	0	0	25,306	28,434	0	0	0	0	0	0	25,306	28,434	0	0	2	0	2	0	0	0	0	0	2	30	2	30										
P	1005140001	1	3781	M1-5A	M1-5R7X	Potential	0	0	5,372	6,037	0	0	0	0	0	5,372	6,037	0	0	0	0	0	0	5,372	6,037	0	0	1	0	1	0	0	0	0	0	1	15	1	15										
PP	1004970015	1	8423	M1-5B	M1-5R9X	Potential	0	0	13,542	15,216	0	0	0	0	0	13,542	15,216	0	0	0	0	0	0	13,542	15,216	0	0	3	0	3	0	0	0	0	0	3	45	3	45										
QQ	1005160036, 1005160037	2	3913	M1-5A	M1-5R7X	Potential	0	0	6,364	7,152	0	0	0	0	0	6,364	7,152	378	425	0	0	378	425	6,742	7,577	0	0	3	0	3	0	0	0	0	0	3	45	3	45										
RR	1005210032	1	2662	M1-5A	M1-5R7X	Potential	4,586	5,265	1,780	2,000	0	0	0	0	0	1,780	2,000	0	0	0	0	0	0	6,366	7,265	2	1	5	0	5	1	1	0	0	0	5	1	5	1										
SR	1005210010	1	2240	M1-5A	M1-5R7X	Potential	0	0	4,336	4,875	0	0	0	0	0	4,336	4,875	0	0	0	0	0	0	4,336	4,875	0	0	2	0	2	0	0	0	0	0	2	30	2	30										
SS	1004750022	1	6536	M1-5B M1-5A	M1-5R7X	Potential	0	0	4,450	5,000	9,790	11,000	0	0	0	14,240	16,000	2,225	2,500	0	0	2,225	2,500	16,465	18,500	0	0	3	0	3	0	0	0	0	0	3	45	3	45										
T	1002320010	1	2541	M1-5B	M1-5R9X	Potential	0	0	4,450	5,000	0	0	0	0	0	4,450	5,000	0	0	0	0	0	0	4,450

SoHo/NoHo Neighborhood Plan RWCDS Table 2: With Action Development

SoHo/NoHo Neighborhood Plan RWCDS Table 3: Incremental Development

