Executive Summary

Introduction

The Housing Blueprint, released in June 2022, is the City's plan to enable greater production of housing and affordable housing in neighborhoods throughout New York City. The plan addresses the city's crippling housing crisis and its real and direct human consequences—high rents, displacement pressure, segregation, gentrification, poor housing quality, tenant harassment, homelessness, and more. The Housing Blueprint also lays out a range of initiatives and tools necessary to make progress on these issues. The Proposed Action described below represents the initiatives and tools relating to zoning, land use regulation, and related laws. The Housing Blueprint makes clear that many of the obstacles to more housing and more affordable housing are rooted in outdated or overly restrictive zoning regulations that have stifled housing production in recent decades even as the housing crisis and its consequences have worsened.

The pervasive nature of the housing crisis calls for a citywide approach, with every neighborhood—from the lowest-density areas to the highest—doing its part to provide a broader range of housing opportunities for the people who call New York City home. Incremental changes across a wide geography can create a significant amount of housing and affordable housing without resulting in dramatic change that can tax infrastructure and that neighborhoods sometimes fear and resist. This is what the Proposed Action aims to accomplish.

While all neighborhoods must do their part, different neighborhoods call for different approaches. Densities, building forms, and other regulations appropriate for central locations with the best access to jobs and transit may not work in neighborhoods farther from the core. With that in mind, the Proposed Action comprises a range of proposals designed to encourage more housing and affordable housing in the range of New York City neighborhoods. Among others, the Proposed Action includes proposals to provide more space for affordable and supportive housing in medium- and high-density districts; to bring back modest, contextual three- to five-story apartment buildings

in transitional areas; and to allow homeowners in New York City's lowest-density areas to add a small ancillary dwelling unit (also known as "ADU" or "accessory dwelling unit"), if they choose.

To create more housing and more types of housing, the Proposed Action includes components that fall into four major proposal areas—1: Medium- and High-Density Districts, 2: Low-Density Districts, 3: Parking, and 4: Other Initiatives that are miscellaneous, citywide in nature, and align with overall project goals. Since the publication of the DEIS, there were minor changes to the proposed text amendment to make clerical corrections, technical fixes, and clarifications due to feedback received during public review noted in **Chapter 1, Project Description** and **Chapter 2, Analytical Framework**, where appropriate. These changes do not change the likely effects of the Proposed Action, and do not require updates to the analytical framework.

Project Purpose and Need

The continued housing shortage has tremendous human consequences—high housing costs, displacement and gentrification pressure, segregation, increased homelessness, tenant harassment, low housing quality, and other effects of a market where residents have very limited options because of housing scarcity. Almost every hardship of the New York City housing market can be traced back to an acute shortage of housing.

The housing shortage drives up prices for everyone. According to federal housing guidelines, an apartment must cost 30 percent or less of a household's gross income to be considered affordable. Today, the share of renters in the city who pay more than this (and are thus "rent-burdened") remains the highest on record. According to the most recent data, 53 percent of renter households in New York City are rent-burdened, including 32 percent of renter households who are severely burdened and pay more than 50 percent of their income toward housing costs. The median New York City renter paid 34 percent of their income toward housing costs—that is, half of renters had a higher burden and half had less. The lowest-income households are the most severely affected. Housing with rents that are affordable to the average New Yorker is even harder to find: vacancy rates for apartments renting for less than $1,500 per month, for instance, are less than ~~one~~1 percent. For example, a household of three people earning 60 percent of Area Median Income (AMI) in 2019 would have needed to find a 2-bedroom apartment renting for $1,290 or less. Especially for households with lower incomes overall, this high level of rent burden means that residents have less money to spend on food, childcare, education, healthcare, and other necessary expenses.

The lack of housing also raises the cost of owner-occupied housing, depriving homeownership to a broad segment of New York City's population. Indeed, despite its wealth, New York City has one of the lowest homeownership rates of any city nationwide. This narrows housing choice for New Yorkers and excludes too many from the control and wealth-building opportunities that homeownership affords. More housing can benefit renters, homeowners, and potential homeowners alike.

Despite the City's unparalleled investments in creating and preserving affordable rental housing over the past 40 years, the continued shortage of housing options contributes to the City's ongoing affordability and homelessness crisis. This crisis impacts millions of New Yorkers in detrimental ways, from struggling to keep up with high housing costs, to spending months or years in shelter, to dealing with pests, mold, lead paint, and heat outages in older homes that landlords in a tight market have little incentive to maintain.

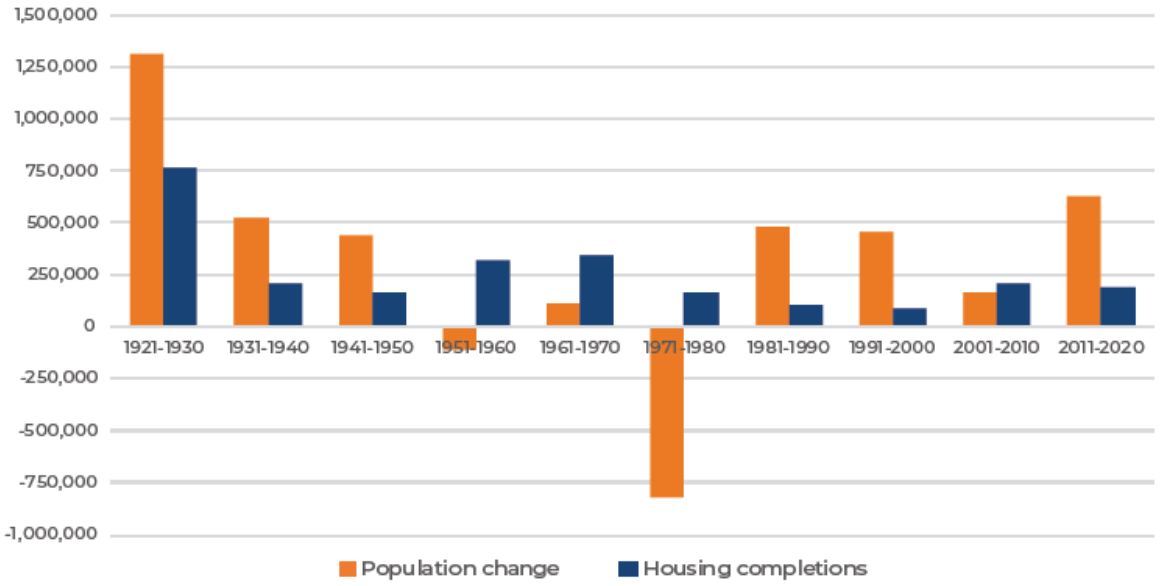
The housing shortage exacerbates disparities in access to transit, amenities, and economic opportunity, forcing many households to make trade-offs between the location, quality, and affordability of housing. High home prices put homeownership and its wealth-generating benefits out of reach for the vast majority of New Yorkers, especially communities of color. A large and growing body of research by Harvard Professor Raj Chetty and others documents the consequences: Drastically divergent life outcomes for families and children depending on where they can afford to live. The housing shortage is a primary driver of this fair housing disaster.[1]

The City cannot solve its affordability and homelessness crisis without changing the trajectory of housing growth in New York City. In recent decades, New York City has experienced rapid population growth. More recently, housing demand has spiked as people seek more space in the aftermath of the pandemic. Rental housing is under particular pressure as high mortgage rates prevent people from accessing or even attempting to access homeownership opportunities. Housing production has not kept pace. This accumulated housing shortage has led to significant increases in housing costs and placed enormous pressure on low-income New Yorkers (see **Figure ES-1**). To reverse this crisis and meet the housing needs of all residents, the pace of housing production must be increased today and into the future.

New York City's housing stock has not kept up with the rapid population growth, job growth, and new household formation that our city has experienced in recent decades. Even as the population surged throughout the 1980s and 1990s, housing was built at a much slower pace than was necessary to meet the demand. These trends have created a cumulative housing shortage from which the city has yet to recover. Although housing construction picked up in the 2000s, much less housing is being built today than during the first three-quarters of the 20th century, adding too few units to keep up with job and population increases. New York City produces significantly fewer new units per capita than many other major cities across the country (see **Figure ES-2**). This worsening shortage is the leading driver of increased housing costs as a burgeoning population competes for limited housing stock.

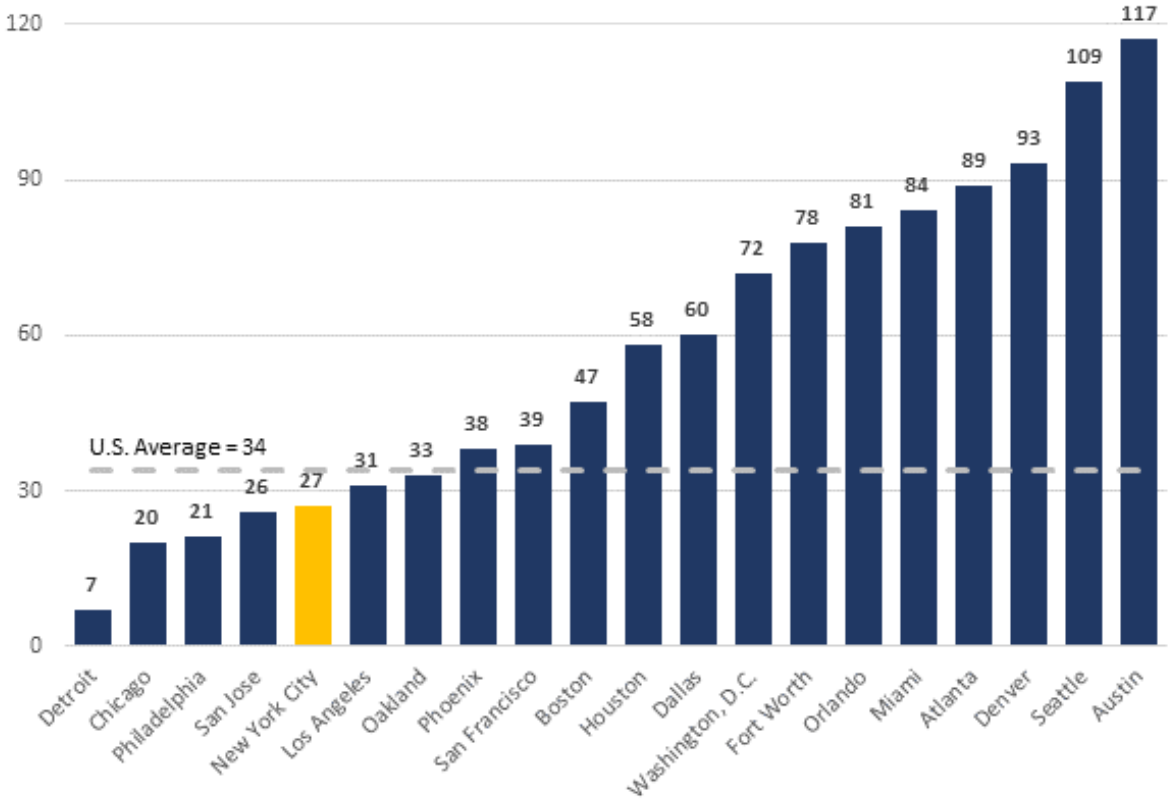
[1] https://opportunityinsights.org/

Figure ES-1 Population Change vs. Housing Completions in NYC by Decade, 1921-2020



Source: Department of City Planning

Figure ES-2 New Housing Units per 1,000 Residents in Major U.S. Cities, 2011-2020



Sources: U.S. Census Bureau Building Permit Survey (BPS) County Annual Files (imputed); U.S. Census Bureau Delineation Files March 2020; NYC DCP Housing Database Q4 2020; U.S. Census Bureau Redistricting Data Files 2021. New housing units measured as authorizations for new units by building permits.

The lack of housing and affordable housing puts New Yorkers at greater risk of housing instability and makes it more difficult for residents experiencing homelessness to regain stable housing. Even though the City has expanded the availability and purchasing power of housing vouchers for tens of thousands of homeless New Yorkers, there are simply not enough available homes, making it difficult for households with vouchers to find an apartment to move into. The impacts of COVID-19 exacerbated these challenges, contributing to longer stays in shelter for New Yorkers in need. While the average length of stay in shelter for families with children was already 446 days in Fiscal Year 2019, it grew to 520 days in Fiscal Year 2021. This means that the average homeless family now stays in shelter for the better part of two years.

High prices and prolonged shelter stays in a tight housing market with few options are not the only ways that the housing crisis manifests. The housing options of many New Yorkers are constrained not only by the lack of affordable housing overall but the dearth of affordable options that meet individual household needs. Growing numbers of seniors and young adults are forced into difficult rooming situations because of the lack of studio and one-bedroom apartments. Intergenerational families and other household types may be forced to compromise their privacy, space, and other housing preferences because they cannot find affordable units that meet their needs.

The harms of the housing crisis also exacerbate long-standing racial inequities in our housing stock and neighborhoods. New Yorkers of color and particularly Black and Hispanic residents are disproportionately impacted by the housing and homelessness crisis. Although Black and Hispanic New Yorkers make up approximately 49 percent of the City's population, 94 percent of families with children in shelter are Black or Hispanic.

The stress, insecurity, and often crowded conditions that come with homelessness and unstable housing have a profound impact on the ability of students to learn and perform in school. In 2018, fewer than two in three students who had experienced temporary housing graduated on time.

Black and Hispanic/Latino New Yorkers are also significantly more likely to experience unsafe and unhealthy housing conditions, such as lack of heat, the presence of rodents, mold, asbestos, and peeling paint that may expose children to lead. In 2021, one in five Black and Hispanic New Yorkers reported experiencing three or more maintenance problems in their homes, compared to only 7 percent of White non-Hispanic households.

It is no coincidence that many components of the Proposed Action have their origins in the Where We Live NYC Plan, New York City's federally mandated fair housing report that identifies the goals, strategies, and actions the City will take to "affirmatively further fair housing" to address long-standing racial inequities in the years ahead.

The Role of Zoning

While development decisions are driven by a variety of factors, a growing body of research shows that restrictive zoning is by far the leading cause of the dire housing shortages facing high-cost housing markets along the coasts and in an increasing number of cities throughout the country. The inability to build enough housing means that housing need, fueled by growing populations, increased household formation, and national and regional economic growth, translates into higher and higher housing costs rather than more housing.

The role of zoning is apparent in New York City, where years-long planning efforts to increase housing capacity and introduce inclusionary housing one neighborhood at a time in medium- and

high-density neighborhoods have yielded insufficient results. At the same time, housing production in New York City's lower-density areas has plummeted. Prior to the mid-2000s, low-density areas accounted for a significant percentage of housing production citywide, but changes to zoning and other applicable laws have brought that to a near standstill. The introduction of low-density contextual districts in the 1980s and 1990s, and the creation of "Lower Density Growth Management Areas" in the early 2000s, have halted housing production across a wide swath of the city.

As a result, the vast majority of housing production in New York City comes in the form of more expensive multifamily typologies, such as high-rises that require steel and reinforced concrete construction, with lower density areas contributing relatively small numbers of one- or two-family homes. Construction of smaller apartment buildings, common prior to 1961 when the current zoning resolution was implemented, is largely a thing of the past. This is the "missing middle" housing that is relatively inexpensive to build and filled an important market niche in times past. The dearth of missing middle housing hits many New York City neighborhoods harder with each passing year, contributing to overcrowding and the spread of informal housing in lower density areas that can present very real health and safety issues.

Missing middle housing was not the only type to dwindle for reasons of prejudice and exclusion. For instance, New York City effectively banned rooming units in the 1950s and actively worked to phase out Single Room Occupancy (SRO) housing in the decades that followed, largely because it was seen as attracting an unsavory population. The City realized that SROs provided crucial housing of last resort during the burgeoning homelessness crisis in the 1980s and completely reversed course, mandating that any existing SROs continue operating—a policy that was struck down in the landmark Seawall Associates v. New York City in 1984. By that time, much of the SRO stock was gone. This was an important demonstration of the principle that banning housing or certain types of housing does not make the people who need that housing disappear.

In the face of these spreading shortages, research shows that new housing can have a moderating effect on housing costs on a regional, citywide, and even neighborhood scale by giving tenants and others more options. With this context in mind, the Proposed Action aims to address the housing shortage and its human consequences by facilitating new housing and a wider range of housing types in every neighborhood in New York City—from the lowest density areas to the highest.

In medium- and high-density districts, the Proposed Action would create a universal inclusionary housing framework that maintains existing FARs for market-rate housing while providing a preferential FAR for all affordable and supportive housing, matching the existing higher FAR available today for Affordable Independent Residences for Seniors (AIRS)—that is, senior affordable housing. In districts that do not have a higher FAR for AIRS, the Proposed Action would create a new preference for affordable and supportive housing that is 20 percent higher than FAR for market-rate housing. Where necessary, the Proposed Action would also adjust building envelopes to ensure that typical sites can accommodate the additional floor area provided for affordable and supportive housing. This incremental increase in capacity, available only for affordable and supportive housing, has the potential to create significant amounts of new affordable housing over time to address both the fundamental housing shortage and the lack of low-cost housing.

In medium- and high density non-contextual districts, the Proposed Action would eliminate barriers to contextual, height-limited infill development on "tower-in-a-park" residential campuses and other zoning lots with existing buildings developed pursuant to outdated zoning regulations originally

intended for Urban Renewal projects on cleared ~~"~~superblocks~~"~~.[2] The Proposed Action would also extend or create flexible Quality Housing envelopes for irregular or obstructed sites in medium- and high-density non-contextual districts, enabling Quality Housing on sites that may be forced to develop pursuant to Height Factor regulations under today's zoning—an outcome that neither developers nor neighborhood residents tend to like. The Proposed Action would also create a discretionary action for sites that need more relief to develop pursuant to Quality Housing regulations. These actions would create incremental opportunities for new housing in medium- and high-density non-contextual districts throughout the City in building forms that fit in better with existing context.

The Proposed Action would extend the City's powerful adaptive reuse regulations citywide and to buildings constructed in 1990 or earlier and would enable conversion to a wider range of housing types, such as supportive housing, dormitories, and rooming units. This action has the potential to create significant amounts of new housing from vacant office buildings and other underutilized non-residential space, with adjustments to the overall framework that make it easier for conversions to reach lower market tiers and especially underserved niches in the housing market.

Within the Inner Transit Zone, the Proposed Action would allow developments consisting of smaller apartments, such a studios and one-bedrooms, by eliminating the ~~"~~dwelling unit factor~~"~~ (DUF), a zoning regulation that sets a minimum average unit size for multifamily developments. This prohibits building types that in times past filled an important market niche for smaller households, including young people, old people, marginally housed populations, and the many New Yorkers who want to live alone but are forced into sometimes difficult rooming situations. The Proposed Action would reduce and simplify DUF outside the Inner Transit Zone. While the primary obstacles to rooming units exist outside of zoning regulations, the Proposed Action would remove or adjust zoning provisions that stand in the way of rooming units when otherwise allowed under applicable laws. These actions are not expected to induce development so much as enable a broader range of typologies than would otherwise be permitted.

In low-density districts, the Proposed Action would adjust FAR, height, and yard regulations, among other provisions, to save existing housing from non-compliance and enable new development consistent with what low-density districts ostensibly allow today. The layering of restrictions over time has resulted in many existing buildings no longer complying with zoning, making it difficult or impossible to adapt these buildings to changing needs. These restrictions also mean that it can be difficult or impossible to develop anything other than a single-family home, even in districts that nominally allow two-family houses or small apartment buildings. These actions will help to reduce barriers for existing homeowners in these areas while enabling marginally more housing in low-density districts.

In low-density districts, the Proposed Action would greatly expand opportunities for new "missing middle" housing—that is, small apartment buildings that are relatively inexpensive to build and hearken back to forms prevalent in these areas prior to the advent of low-density zoning in 1961. The Proposed Action would address decades of restrictions and enable small apartment buildings with non-residential ground floors in all low-density commercial districts, bringing back a beloved typology illegal in low-density areas today. The Proposed Action would also enable transit-oriented missing middle housing on large sites within the Greater Transit Zone—that is, the Manhattan Core

[2] Superblocks are formed by eliminating sections of streets from the overall street grid to assemble large parcels; many superblocks were created in the mid-~~20th~~twentieth century for the development of tower-in-the-park housing projects; other superblocks were formed for civic and institutional uses, such as Grand Central Terminal, the New York Public Library, Rockefeller Center, Lincoln Center, among others.

and Long Island City, the Inner Transit Zone, and a newly created Outer Transit Zone that will generally encompass all areas within a half-mile of a transit stop. These initiatives add housing in parts of the city that have produced very little in recent decades, but also encourage housing options for older, smaller, or lower-income households that face particular challenges finding appropriate housing in low-density areas. The Proposed Action would also remove obstacles to construction of new infill development in low-density districts on campuses above 1.5 acres and full-block sites, based on FAR, maximum lot coverage, relaxed distance-between-buildings regulations, and new height limits.

Also in low-density areas, the Proposed Action would enable "accessory dwelling units" or ADUs on lots with one- or two-family housing. ADUs would be size-limited and exempt from parking requirements and regulations that limit the number of units, such as restrictions in one- or two-family zoning districts. This includes homeowners who may need space for a family member or for whom the extra income generated by a small rental unit is essential. ADUs are a form of housing that is common in other parts of the country, provides a housing type sorely lacking in low-density areas, and supports flexibility and opportunity for a range of household types, including multigenerational families, smaller households, those looking to age in place, and many others. On a macro level, ADUs also provide an important avenue for "gentle density" while maintaining the character of one- and two-family areas.

In all districts, the Proposed Action would eliminate parking requirements for all new residential development citywide. This would reduce the conflict between parking and housing, providing opportunities for additional housing on development sites across the city. Today, parking requirements reduce the amount of housing that can be produced on certain sites while rendering development entirely infeasible on others. While the Proposed Action would not eliminate existing parking required by existing housing, it would create a discretionary action to remove existing parking requirements when appropriate.

Finally, the Proposed Action will include other project components that do not fit neatly into the categories above but have citywide effect and are consistent with the overall project goals of facilitating more housing and more types of housing in neighborhoods across the city. These include allowances for irregular and hard-to-develop sites; elimination or reduction of unnecessarily onerous approval procedures; elimination of exclusionary geographies from prior eras; and adjustments to regulations that have had unintended outcomes for development and design.

High-Level Description of the Proposed Action

As discussed above, the Proposed Action includes components that fall into four major proposal areas—1: Medium- and High-Density Districts, 2: Low-Density Districts, 3: Parking, and 4: Other Initiatives that are miscellaneous, citywide in nature, and align with overall project goals. A high-level description of the Proposed Action is provided in this section with more detailed provided in **Table ES-1**.

1: Medium- and High-Density Proposals

Medium- and high-density districts (R6 through R10) are typically mapped in areas where transit access, job access, infrastructure, and other factors make such densities appropriate. Housing in these areas generally consists of multifamily housing that includes income-restricted affordable

housing, rent-regulated housing, and market-rate housing that ranges from modest and relatively inexpensive to some of the most expensive housing in the world. The Proposed Action would increase housing opportunities in these areas by increasing affordable and supportive floor area ratios (FARs) in all medium- and high-density districts, expanding eligibility for the City's adaptive reuse regulations to a broader range of buildings such as struggling office districts, enabling small and shared apartment models to take pressure off family-sized units, and simplifying infill regulations for campuses and other zoning lots with existing buildings.

2: Low-Density Proposals

Low-density districts are usually mapped in areas with less access to transit, jobs, and infrastructure than medium- and high-density areas. In some areas, they have also served as unduly restrictive ways to "protect" neighborhoods from unwanted change and development, a condition that is certainly not unique to New York City. Housing in these areas may consist of one- and two-family homes but also multifamily housing constructed under current regulations, where still permitted and feasible, or prior to the advent of contemporary low-density zoning in 1961. The Proposed Action would increase housing opportunities in these areas by adjusting zoning regulations to ensure that two- and multi-family districts genuinely allow two- and multi-family housing nominally permitted, by reintroducing modest 3- to 5-story apartment buildings in low-density commercial districts and on large sites near transit, and by newly enabling owners of one- and two-family houses to add an ADU if they choose. Aspects of the conversions and small and shared apartments proposal will apply in low-density areas as well.

3: Parking Proposals

Residential parking regulations set minimum numbers of required parking spaces based on zoning district and number of dwelling units, as modified by relevant geographies (like the "Transit Zone" which is to be renamed the Inner Transit Zone), housing type (such as "income-restricted housing unit" (IRHU) or "affordable independent residences for seniors" (AIRS)), and other factors such as lot size. In general, these regulations date to the 1960s when the automobile was ascendant, and housing was relatively inexpensive and abundant. The Proposed Action would increase housing opportunities by eliminating costly parking mandates citywide for new residential development and simplifying the suite of exemptions and discretionary actions for existing residential developments.

4: Other Initiatives

The Proposed Action will also include a range of other proposals intended to facilitate more housing and a broader range of housing types by removing obstacles, simplifying overcomplicated zoning, and updating regulations conceived in the last century to address a very different set of circumstances. These include relief for challenged sites and from unnecessarily onerous procedures; adjustment or elimination of outdated or exclusionary limits on development; and creation of residential zoning districts to ensure a full range of densities appropriate for New York City neighborhoods, among other initiatives.

Table ES-1 Likely Effects of the Proposed Action

Item	Proposal	Applicability by Zoning District (including Commercial Equivalents)	Likely Effects
1: Medium- and High-Density Proposals			
1.1 More Floor Area for Affordable and Supportive Housing			
1.1a	Increase the FARs for all forms of affordable and supportive housing to the higher AIRS FAR	R6-R10 districts	Construction of more mixed-income and affordable and supportive housing within bigger building envelopes as-of-right in medium and high-density districts citywide.
1.1b	In districts without an existing AIRS preference, provide new preferential FAR for AIRS and other affordable and supportive housing types that is 20 percent above the FAR for market-rate residential	R6-R10 districts	Construction of more mixed-income and affordable and supportive housing within bigger building envelopes as-of-right in medium and high-density districts citywide.
1.1c	Replace IHDAs and R10 IH with the preferential FAR framework	R6-R10 districts	Increased FARs for affordable and supportive housing in some districts while enabling income averaging and lower AMIs than the current IHDA and R10 IH programs in all districts
1.1d	Equalize FARs for MIH districts where FARs proposed for UAP are higher	Select MIH Areas	Small FAR increases and additional housing in MIH Areas with lower FARs than those proposed for UAP
1.1e	Where necessary, adjust building envelopes to accommodate FARs	R6-R10 districts	Construction of more mixed-income and affordable and supportive housing within bigger building envelopes as-of-right in medium and high-density districts citywide
1.1f	Allow supportive housing to be classified as either UG 2 or UG 3	All Residence Districts	More supportive housing by enabling supportive housing to access the advantages of community facility or residential use regardless of district
1.1g	Modify the ZR 74-903 Special Permit to an Authorization for supportive housing	R3-R9 districts	Make it easier for supportive housing projects to access a higher FAR where available while retaining the discretionary review that ensures a higher FAR and that the resulting bulk are appropriate

Table ES-1 Likely Effects of the Proposed Action

Item	Proposal	Applicability by Zoning District (including Commercial Equivalents)	Likely Effects
1.2 Small and Shared Apartments			
1.2a	Eliminate Dwelling Unit Factor (DUF) within the Inner Transit Zone (including the Manhattan core)	All Residence districts within Inner Transit Zone	Modest increase to the overall housing supply as developments are enabled to provide the number of DUs that zoning currently allows; also, the creation of a wider variety of unit sizes that are responsive to residential demand.
1.2b	Reduce and simplify DUF outside the Inner Transit Zone	All Residence Districts outside the Inner Transit Zone	Smaller units allowable overall and more multifamily housing in low-density districts.
1.2c	Eliminate DUF within One- and Two-Family Buildings	All Residence Districts	Removal of redundancy.
1.2d	Remove zoning obstacles to small and shared housing models	All Residence Districts	More construction of housing with shared models or rooming units.
1.3 Eliminate Obstacles to Quality Housing Development			
1.3a	Remove obstacles to Quality Housing development on sites with existing buildings	R6-R10 non-contextual districts	Increased infill development within FAR limits on zoning lots with existing buildings
1.3b	Remove obstacles to Quality Housing development on irregular lots and lots where development is challenged by nearby infrastructure and other obstructions	R6-R10 non-contextual districts	Construction of more housing on lots with irregular or difficult site conditions
1.3c	Provide more flexible envelopes in Waterfront Areas to enable a broader range of development, including affordable housing	Waterfront Areas	Construction of more housing and affordable housing in waterfront areas
1.3d	Eliminate the "sliver law" for developments that utilize Quality Housing regulations, regardless of district	R7-R10 districts	Construction of more housing and affordable housing within FAR limits within these districts

Table ES-1 Likely Effects of the Proposed Action

Item	Proposal	Applicability by Zoning District (including Commercial Equivalents)	Likely Effects
1.4 Conversions			
1.4a	Change the cutoff date for conversion from 1961 or 1977 to 1990	All Districts that allow residential	Increased housing through adaptive reuse and conversion of a broader universe of non-residential buildings
1.4b	Expand the geographic applicability of the adaptive reuse regulations citywide	All Districts that allow residential	Increased housing through adaptive reuse and conversion of a broader universe of non-residential buildings outside of central business districts
1.4c	Enable conversion to a wider variety of housing types	All Districts that allow residential	Increased supply of rooming units and community facilities with sleeping accommodations through adaptive reuse and conversion of a broader universe of non-residential buildings
1.4d	Eliminate outdated restrictions on conversions to residential uses in C6-1G, C6-2G, C6-2M and C6-4M commercial districts	C6-1G, C6-2G, C6-2M and C6-4M districts	More conversions in districts within central Manhattan
2: Low-Density Proposals			
2.1 Low-Density Basic			
2.1a	Provide additional FAR and adjust floor area rules	R1-R5 districts	Increased production of housing through the creation of accessory dwelling units; increased amount of living space that is functional within homes
2.1b	Adjust perimeter height limits and building envelopes	R2A, R2X, R3-1, R3A, R3X, R3-2, R4A districts	Taller perimeter heights within existing maximum heights and FAR limits
	Eliminate side and rear setbacks	R1-R5	Changes to building form within FAR limits
2.1c	Adjust yard, open space, and court requirements	R1-R5 districts	More flexibility on building location on zoning lots in low-density districts resulting in some additional housing
	Adjust yard requirements and lot coverage maximums	R1-R5 districts	More flexibility on building location on zoning lots in low-density districts resulting in some additional housing
	Shallow lot relief	R1-R5 districts	More flexibility on building location on zoning lots in low-density districts resulting in some additional housing
	Eliminate open space ratio	non-contextual R1 and R2 Districts	Changes to design and appearance of yards

Table ES-1 Likely Effects of the Proposed Action

Item	Proposal	Applicability by Zoning District (including Commercial Equivalents)	Likely Effects
	Simplify front yard planting requirement	R1-R5 districts	Changes to design and appearance of yards
	Allow small courts	R1-R5 districts	Changes to design to allow for more flexibility and windows
2.1d	Increase Flexibility for Off-Street Parking Where Required or Voluntarily Provided	R1-R5 districts	Parking is better able to fit on a variety of sites resulting in a modest increase in supply at some locations. Less conflict between parking and housing, enabling more of both.
2.1e	Relax minimum lot size and width restrictions	R1-R5 districts	More development of allowed housing typology on small lots
2.2 Low-Density Plus: "Missing Middle" Housing			
2.2a	Low-Density Commercial Districts: Provide additional FAR and height and preferential FAR for mixed developments	Low-density commercial districts and R1-R5 districts with commercial	More mixed-use development and more housing on commercial corridors within larger building envelopes
2.2b	Qualifying Sites: Define qualifying site criteria, modify use regulations, and provide additional FAR and adjustments to height and setback regulations	R1-R5 districts	More multifamily development within the Greater Transit Zone within larger building envelopes
2.2c	Allow Infill on Low-Density Campuses: Define campus as a 1.5-acre or full block site, replace yard and open space requirements with a 50-percent coverage maximum, provide new height limits for infill developments in certain districts	R1-R5 districts	Increased infill on residential campuses within FAR limits
2.3 Accessory Dwelling Units			
2.3a	Define "Accessory Dwelling Unit"	All Residence Districts	Allowance of new housing typologies citywide
2.3b	Provide relief for ADUs from various zoning regulations that would otherwise apply		Construction of ADUs located on zoning lots with a one- or two-family buildings

Table ES-1 Likely Effects of the Proposed Action

Item	Proposal	Applicability by Zoning District (including Commercial Equivalents)	Likely Effects
3: Parking Proposals			
3.1 Maintain and Extend a Comprehensive Set of Transit Geographies			
	Maintain and extend a comprehensive set of transit geographies	Citywide	Provides a basis for aspects of the Proposed Action by maintaining or defining the Manhattan Core & Long Island City; Inner Transit Zone; Outer Transit Zone; and outside Greater Transit Zone geographies.
3.2 Reduce, Simplify, and Streamline Parking Requirements			
3.2a	Eliminate Parking Requirements for New Residential Development	Citywide	Increased housing production on sites that have been constrained by parking requirements. No effects due to clarifications to permitted maximums
3.2b	Eliminate Parking Requirements for Non-Residential Uses in Mixed Buildings	Citywide	Increased housing production on sites that have been constrained by parking requirements for residential and non-residential uses; increased supply of mixed-use buildings.
3.2c	Create Discretionary Action to Remove Parking Requirements for Existing Buildings and Clarify other Discretionary Actions	Citywide	No effect until discretionary action is sought and more fully analyzed at a future date.
3.2d	Streamline floor area exemption for parking spaces	Citywide	Simplify regulations
3.2e	Allow Public Use of Residential Accessory Parking Facilities	Citywide	More efficient use of available parking spaces, no change to travel characteristics within neighborhoods.
3.2f	Adjustments to the Manhattan Core Regulations	Citywide	Simplify regulations

Table ES-1 Likely Effects of the Proposed Action

Item	Proposal	Applicability by Zoning District (including Commercial Equivalents)	Likely Effects
4: Other Zoning Proposals			
4.1 Create New Zoning Districts to Fill FAR Gaps			
	Create new zoning districts that can be mapped subsequently via zoning map actions	Mapped in Future	No effects until mapped and more fully analyzed at a future date
4.2 Street Wall Regulations			
4.2a	Establish a new system of street wall regulation	R6-R10 districts	Improved building design
4.2b	Provide more flexible base heights	R6-R10 districts	Greater flexibility in building design
4.2c	Simplify dormer provisions	R6-R10 districts	Greater flexibility in building design
4.3 Allowances for Irregular and Challenged Sites			
4.3a	Provide setback and height relief for sites near elevated infrastructure	R6-R10 districts	Increased housing supply within 100 feet of elevated infrastructure
4.3b	Increase tower coverage maximums for small lots in districts subject to tower regulations	R9-R10 districts	Greater flexibility in tower regulations resulting in shorter, more constructable buildings
4.3c	Provide noncompliance allowances for beneficial alterations	All Residence Districts	Increased likelihood of existing buildings with non-compliances making alterations
4.3d	Create New Discretionary Actions to Provide Bulk Relief for Challenged Sites	All Residence Districts	Streamlined regulations
4.4 Replace Qualifying Ground Floor Regulations			
	Require that a second story begin no lower than 13 feet above the adjoining sidewalk	R6-R10 districts	Simplify regulations

Table ES-1 Likely Effects of the Proposed Action

Item	Proposal	Applicability by Zoning District (including Commercial Equivalents)	Likely Effects
4.5 Increase Flexibility for Zoning Lots Split by a District Boundary			
	Allow greater flexibility for the development of split zoning lots to enable greater concentration of density along avenues and other wide streets	All Residence Districts	~~Increased housing supply on higher density portion of split lots~~Greater flexibility in building design
4.6 Simplify and Standardize Tower-on-a-Base Regulations			
	Replace the various forms of tower-on-a-base regulation with a uniform system	R9-R10 districts	Streamline regulations
4.7 Eliminate Limits on Side-by-Side Residences in Two-Family Districts			
	Eliminate the authorization in ZR Section 22-42 to allow side-by-side 2-family homes as-of-right	R3-1 R3A R3X R4-1 R4A districts	Increased development of side-by-side homes
4.8 Eliminate Exclusionary Geographies			
4.8a	Eliminate reductions to FAR and heights in certain zoning districts in the Manhattan Core	R6, R7, R8 districts within MN Core	Increased housing production in areas where development has been unnecessarily stifled
4.8b	Remove limits on FAR and affordable housing production in R10 districts and equivalents in Manhattan Community District 7	R10 within Manhattan CD 7	Increased housing production in areas where development has been unnecessarily stifled
4.8c	Remove limits on heights in R8 districts in Manhattan Community District 9	R8 within Manhattan CD 9	Increased housing production in areas where development has been unnecessarily stifled
4.8d	Remove Limited Height Districts in Cobble Hill, the Upper East Side, and Gramercy Park	All zoning districts within LH geographies	Increased housing production in areas where development has been unnecessarily stifled
4.8e	Remove restrictions on development and enlargement of nursing homes in the Bronx Community District 11, Manhattan Community District 8, and Staten Island Community District 1.	Bronx CD 11, Manhattan CD8 and Staten Island CD1	Permit nursing homes as-of-right without a special permit, as permitted by underlying zoning

Table ES-1 Likely Effects of the Proposed Action

Item	Proposal	Applicability by Zoning District (including Commercial Equivalents)	Likely Effects
4.9 Clarify and Simplify the Railroad Right-of-Way Regulations			
	Create certain definitions and reduce or eliminate approval procedures	Citywide	Clarify and simplify regulations for development near railroad rights-of-way and increase development on smaller lots with ~~former~~railroad rights-of-way
4.10 Simplify and Expand the Landmark TDR Program			
	Loosen restrictions on ability of designated landmarks to transfer unused development rights	Citywide	Increase housing production near landmarked sites and better maintenance of participating landmarks
4.11 Special Permit Renewal			
	Eliminate certain requirements for vesting for abutting buildings	Citywide	Streamline regulations for multi-phased developments
4.12 Clarify Adjacency Rules for MX Districts			
	Clarify that the adjacency requirements of section 43-30 do not apply to MX districts	MX Districts	Streamline regulations
4.13 Reduce Procedure for Enlargements Under 73-622, Enlargements of Single- and Two-Family Detached and Semi-Detached Residences			
	Reduce procedural requirements associated with section 73-622	Portions of Brooklyn	1- and 2-family homes in defined geographies in Brooklyn, and elsewhere, if geographic applicability is extended, are better able to enlarge and meet evolving needs of residents

Analysis Framework and Reasonable Worst-Case Development Scenario

Analytical Approach to the EIS

This EIS uses methodologies and follows and supplements the guidelines set forth in the *CEQR Technical Manual*, where applicable. These are considered to be the most appropriate technical analysis methods and guidelines for environmental impact assessment of projects in the city.

Consistent with *CEQR Technical Manual* guidance, the Proposed Action will be analyzed as a "generic action" as its wide applicability throughout the City makes it difficult to predict the specific sites where development would be facilitated by the Proposed Action. According to the *CEQR Technical Manual*, generic actions are programs and plans that have wide application or affect the range of future alternative policies. Usually, these actions affect the entire city or an area so large that site-specific description or analysis is not appropriate.

To produce a reasonable analysis of the likely effects of the Proposed Action, and due to the broad applicability of the Proposed Action, the EIS evaluates the potential effects of the Proposed Action, citywide, in two main assessments (which are described in further detail below):

- Prototypical Site Assessment. This assessment aligns with the CEQR methodology in which typical cases and a range of conditions are identified. The Prototypical Sites allow assessment of outcomes of specific aspects of the Proposed Action at a site-level geography.
- Representative Neighborhood Assessment. This assessment aligns with the CEQR methodology in which typical cases and a range of conditions is identified. The Representative Neighborhoods allow assessment of outcomes of the accumulation of the Proposed Action at a neighborhood-level geography.

The With-Action condition therefore identifies the amount, type, and location of development that is expected to occur by 2039 as a result of the Proposed Action. The No-Action condition identifies expected development projections for 2039 absent the Proposed Action. The incremental difference between the two scenarios serves as the basis for the impact analysis.

In addition, since the Proposed Action would create certain authorizations and, in some cases, new zoning districts, the EIS includes a Conceptual Analysis to assess the potential future use of these authorizations.

The following sections provide a high-level summary of the assumptions and methodology for the Prototypical Site and Representative Neighborhood Assessments as well as for the Conceptual Analysis.

Prototypical Site Assessment

To produce a reasonable analysis of likely effect of the Proposed Action, ~~27~~28 representative development prototypes have been identified that reflect various combinations of residential zoning categories, development densities, and building typologies throughout NYC. Reasonable Worst Case Development Scenarios (RWCDS) were identified for each Prototypical Site to identify the future conditions of each site under both the No-Action and With-Action conditions. The incremental

difference between the No-Action and With-Action conditions serves as the basis for the analyses by which the potential environmental effects of the Proposed Action are evaluated.

Overall, the Prototypical Sites were developed to demonstrate a range of densities and lot sizes. The selected prototypes are summarized in **Table ES-2**~~**Table 2-2**~~. These sites are not necessarily representative of a specific lot, but rather reflect prevalent conditions as a basis for analysis.

Table ES-2 Prototypical Sites

ID	Prototype Character	Example Zoning District	Building Typology	Construction Type	Proposals Represented
Category 1: Medium- and High-Density Proposals					
1-1	10,000-sf vacant lot within Inner Transit Zone	R6	Multi-family	New construction	1.1, 3.2a, 4.2b
1-2A	10,000-sf vacant lot within Manhattan Core	R8B	Multi-family	New construction	1.1, 4.2b
1-2B	4,500-sf vacant lot within Manhattan Core	R8B	Multi-family	New construction	1.1, 1.3d, 4.2b
1-3A	10,000-sf vacant lot within Inner Transit Zone	R8/C1-4	Multi-family	New construction	1.1, 3.2a, 4.2b
1-3B	2,500-sf vacant lot within Inner Transit Zone	R8	Multi-family	New construction	1.1, 1.3d, 3.2a, 4.2b
1-4A	20,000-sf vacant lot occupying an entire city block within Manhattan Core	R7-2	Multi-family	New construction	1.1, 1.3, 4.2b, 4.3a
1-4B	20,000-sf vacant lot occupying an entire city block within Manhattan Core	R7-2	Multi-family	New construction	1.1, 1.3, 4.2b, 4.3a
1-5	100,000-sf vacant lot in within waterfront block	R7-2	Multi-family	New construction	1.1, 1.3c, 3.2a, 3.2e, 4.2b
Category 2: Low-Density Basic					
2-1	4,000-sf vacant lot outside Greater Transit Zone	R2A	Single-family, detached	New construction	2.1a, 2.1b, 2.1c, 2.1d, 3.2a, 3.2d
2-2A	2,500-sf vacant lot within Inner Transit Zone	R4-1	Two-family, semi-detached	New construction	2.1a, 2.1b, 2.1d, 2.3, 3.2a, 3.2d
2-2B	2,500-sf vacant lot within Inner Transit Zone	R4-1	Two-family, semi-detached	New construction	2.1a, 2.1b, 2.1c, 2.3, 3.2a, 3.2d

Table ES-2 Prototypical Sites

ID	Prototype Character	Example Zoning District	Building Typology	Construction Type	Proposals Represented
2-3A	2,500-sf vacant lot within Outer Transit Zone	R4	Two-family, attached	New construction	2.1a, 2.1b, 2.1c, 2.1d, 3.2a, 3.2d
2-3B	2,500-sf vacant lot within Outer Transit Zone	R4	Two-family, attached	New construction	2.1, 2.1a, 2.1b, 2.1c, 2.1d, 3.2a, 3.2d
2-4	4,000-sf vacant lot outside Greater Transit Zone	R3X	Two-family, detached	New construction	2.1a, 2.1c, 3.2a, 3.2d
2-5	10,000-sf vacant lot within Outer Transit Zone	R1-1	Single-family, detached	New construction	2.1c, 2.1d, 2.1e, 2.3, 3.2a
Category 3: Qualifying Sites/Transit Oriented Development					
3-1A	5,000-sf vacant lot within Outer Transit Zone	R3X	Multi-family	New construction	2.2b, 3.2a
3-1B	5,000-sf vacant lot within Lower Density Growth Management Area (LDGMA) and Outer Transit Zone	R3X	Multi-family	New construction	2.2b, 3.2a
3-2A	10,000-sf vacant lot within Outer Transit Zone	R5	Multi-family	New construction	2.2b, 3.2a
3-2B	10,000-sf vacant lot within Outer Transit Zone	R5	Multi-family	New construction	2.2b, 3.2a
Category 4: Commercial Overlays					
4-1	2,500-sf lot vacant lot outside Greater Transit Zone	R3-2/C1-1	Multi-family, mixed use building	New construction	2.2a, 3.2a, 3.2b,, 4.3a
4-2	5,000-sf vacant lot within Outer Transit Zone	R4/C1-2	Multi-family, mixed use building	New construction	2.2, 3.2a, 3.2b
Category 5: Accessory Dwelling Units (ADUs)					
5-1	6,000-sf lot with single-family, detached building	R1-2	Single-family, detached; detached ADU	New construction (ADU)	2.1a, 2.1c, 2.3
5-2	3,000-sf lot with two-family, semi-detached	R4-1	Two-family, semi-	Conversion and	2.1c, 2.3, 4.3c

Table ES-2 Prototypical Sites

ID	Prototype Character	Example Zoning District	Building Typology	Construction Type	Proposals Represented
	building and detached garage		detached; detached ADU	expansion of detached garage to ADU	
Category 6: Campus					
6-1	Residential Campus outside Greater Transit Zone	R5	Multi-family building	New construction (infill)	2.1, 2.2c, 3.2a, 3.2c
6-2	Residential campus within Inner Transit Zone	R6	Multi-family building	New construction	1.1, 1.3, 2.2c, 3.2a, 3.2c, 4.3a
Category 7: Conversions					
7-1	24,670-sf lot within Manhattan Core with high rise non-residential building	C5-3	Converted non-residential to residential building	Conversion (non-residential to residential)	1.4
7-2	37,760 sf within Inner Transit Zone	R5	Converted non-residential to residential building	Conversion (non-residential to residential)	1.4, 2.2b, 3.2a
Category 8: Railroad Right-of-Way					
8	Residential Site on railroad right-of-way	R6	Multi-Family building	New construction	4.9

For each of the Prototypical Sites, the Future No-Action scenario identifies development projections for 2039 absent the Proposed Action. It is assumed that each Prototypical Site would maximize its development under the permitted zoning regulations. In many cases, lot coverage, building envelope, parking restrictions, and other factors do not allow the maximum development potential to be reached. In these cases, a reasonable, as-of-right development that complies with existing zoning is illustrated in the No-Action scenario. This provides a baseline for analysis of the effect of the Proposed Action.

The Future With-Action scenario assumes that each Prototypical Site would maximize its development under the Proposed Action. By removing zoning constraints and modernizing parking regulations, many sites previously constrained by zoning would be able to meet their maximum allowable development potential. Where additional height, envelope, FAR and uses are introduced by the Proposed Action, this new development potential will be illustrated in the Prototypical Sites. The incremental difference between the No-Action and With-Action scenarios serves as the basis for the impact analyses.

Table ES-3~~Table 2~~ summarizes the residential increment at each of the Prototypical Sites.

Table ES-3 Prototypical Sites—Residential Increment (Units)

Site ID	Location	Total Increment	Affordable Units Increment
1-1	Bushwick, Brooklyn	24	42
1-2A	Upper East Side, Manhattan	9	2
1-2B	Upper East Side, Manhattan	10	2
1-3A	Washington Heights, Manhattan	19	3
1-3B	Washington Heights, Manhattan	12	3
1-4A	Lower East Side, Manhattan	14	3
1-4B	Lower East Side, Manhattan	39	8
1-5	Long Island City, Queens	193	589
		189	117
2-1~~1-6~~	Floral Park, Queens	0	0
2-2A	Ozone Park, Queens	0	0
2-2B	Ozone Park, Queens	0	0
2-3A	Sheepshead Bay, Brooklyn	0	0
2-3B	Sheepshead Bay, Brooklyn	0	0
2-4	Manor Heights, Staten Island	0	0
2-5	Riverdale, Bronx	1	0
3-1A	East Flushing, Queens	4	1
3-1B	New Dorp, Staten Island	4	1
3-2A	New Utrecht, Brooklyn	11	2
3-2B	Bensonhurst, Brooklyn	12	3
4-1	Rosebank, Staten Island	2	0
4-2	Flatbush, Brooklyn	4	1
5-1	Riverdale, Bronx	0	0
5-2	Ozone Park, Queens	0	0
6-1	Oakland Gardens, Queens	621	155
6-2	Bedford-Stuyvesant, Brooklyn	~~202~~201	~~50~~51
7-1	Third Avenue, Manhattan	296	0
7-2	Unionport, Bronx	71	14
8	Bedford-Stuyvesant, Brooklyn	279	70

Representative Neighborhood Assessment

Potential future development in Representative Neighborhoods were estimated to discuss the estimate of the amount, type and approximate location of future development and describe a range of conditions so that the full range of impacts may be identified. With the scale of the Proposed Action, it is difficult to predict specific details about the kind of development that would occur on

each potentially affected site across the city. Therefore, to provide an estimate of the typical outcomes and range of conditions that could occur across different neighborhoods in the city, a RWCDS was developed, supported by a Housing Market study.

Research and modeling were conducted to estimate a range of units that could result in the future citywide and at the NTA level both without and with the Proposed Action. To understand the range of conditions of the Proposed Action, a set of neighborhoods represented by NTAs were selected as Representative Neighborhoods to be studied in this EIS. These neighborhoods represent both a range of housing market types as identified in the Housing Market Study and a range of geographic locations. Each neighborhood's potential Housing Opportunity is defined by the strength of the housing market, its zoned density, and its potential capacity for development under the Proposed Action. To select Representative Neighborhoods for assessment, Neighborhoods were categorized by these characteristics into the following categories:

- Residential Zoning Density[3] - High or Low
- Housing Market Strength[4] - Quintile of 1, of 2 or 3, and of 4 or 5
- Development Capacity - With-Action development capacity as defined by the model discussed above, divided into tertiles.

Each neighborhood was categorized by these three characteristics, creating 18 Potential Housing Opportunity categories (see **Table ES-4**). One neighborhood is analyzed for each category. The neighborhoods were selected accounting for geographic distribution, a range of demographic and economic conditions, and to ensure a demonstration of potential environmental issues. These neighborhoods are presented as representative and are "prototypical". The findings for this assessment are intended to express the range of conditions across the city in order to identify the likelihood and significance of impacts for each type of neighborhood for each technical area.

Three Representative Neighborhoods were identified in the Bronx, five were identified in Brooklyn, three were identified in Manhattan, five were identified in Queens, and two were identified in Staten Island, which is an even distribution compared to the total number of NTAs within each borough.

[3] Percent of residential land zoned R1-R5 and R6-R10 calculated from zoning district data as of January 2024. Neighborhoods are considered high density if more than 50% of their zoned residential land is R6-R10, and low density otherwise.

[4] As defined in the Housing Market Study, see **Appendix B**.

Table ES-4 Representative Neighborhoods - Existing, No-Action, and With-Action Housing Units

RN	Neighborhood Housing Opportunity Category (Market/ Capacity/ Density)[1]	Existing Housing Units	No-Action Housing Units		With-Action Housing Units		Incremental Housing Units	
			Low Estimate	High Estimate	Low Estimate	High Estimate	Low Estimate	High Estimate
1	Low-Mark, Mid-Cap, LD	11,270	11,280	11,320	11,400	11,610	120	280
2	High-Mark, High-Cap, LD	13,520	13,760	13,950	14,910	15,780	1,150	1,840
3	Mid-Mark, High-Cap, HD	25,820	26,460	26,940	26,790	27,860	330	920
4	Low-Mark, High-Cap, HD	23,180	25,440	25,850	25,450	26,280	20	440
5	Low-Mark, High-Cap, LD	22,160	23,990	24,130	24,070	24,450	70	320
6	High-Mark, Mid-Cap, HD	23,040	31,890	32,400	32,290	33,090	410	690
7	Mid-Mark, Mid-Cap, LD	17,650	17,730	17,910	18,370	18,930	640	1,030
8	High-Mark, High-Cap, HD	20,890	24,090	24,280	24,580	24,860	490	580
9	Mid-Mark, Low-Cap, LD	11,730	12,060	12,290	12,210	12,620	150	340
10	Mid-Mark, High-Cap, LD	16,800	16,930	17,080	17,910	18,670	980	1,590
11	Mid-Mark, Mid-Cap, HD	6,820	8,780	9,030	9,040	9,570	270	550
12	Low-Mark, Mid-Cap, HD	19,860	21,390	21,620	21,390	21,780	-	160
13	High-Mark, Low-Cap, HD	57,000	57,390	57,600	57,880	58,190	490	600
14	Mid-Mark, Low-Cap, HD	28,510	28,720	28,890	28,780	29,010	60	120
15	Low-Mark, Low-Cap, HD	8,790	10,000	10,070	10,000	10,120	-	50
16	Low-Mark, Low-Cap, LD	5,760	7,700	7,830	7,740	7,960	40	130
17	High-Mark, Low-Cap, LD	11,020	11,820	11,950	11,980	12,220	160	270
18	High-Mark, Mid-Cap, LD	13,150	13,310	13,470	13,680	14,110	370	640

Notes:

[1] High-Mark = High-Market; Mid-Mark = Mid-Market; Low-Mark = Low-Market; High-Cap = High-Capacity; Mid-Cap = Mid-Capacity; Low-Cap = Low-Capacity; HD = High Density; LD = Low Density

Conceptual Analysis

The Proposed Action would create a series of new discretionary approvals, including authorizations, special permits, and new zoning districts, all of which may be sought at a later date.

Since future development pursuant to these actions would be subject to review by the CPC, any future proposal for these authorizations would be assessed and disclosed to the public under and pursuant to a separate environmental review. Therefore, because it is not possible to predict whether these actions would be pursued on any one site in the future, a conceptual analysis is provided to generically assess the potential for environmental impacts. The assessment provides a general analysis of the potential future use of new authorizations and special permits and their potential environmental effects. For the discretionary actions that would result in a development outcome constrained by zoning parameters (i.e., proposed new zoning districts), Conceptual Sites are provided to produce a reasonable analysis of the likely effects. The two Conceptual Sites considered are as follows:

- Conceptual Site 1: New Zoning District – R12 (Based on Third Avenue, Manhattan).
- Conceptual Site 2: New Zoning District – R6D (Based on New Utrecht, Brooklyn)

Principal Conclusions of Environmental Analysis

Land Use, Zoning, and Public Policy

The Proposed Action would not result in significant adverse impacts on land use, zoning, or public policy. The Proposed Action would not facilitate a change in land uses that would otherwise be permitted in the future without the Proposed Action or would be incompatible with existing land uses or public policy. As the Proposed Action would not change the underlying zoning, it would not create land uses or development that would be inconsistent with uses that are permitted as of right in the underlying zoning district or conflict with public policies applicable to the affected districts or surrounding neighborhoods. Furthermore, the Proposed Action would further the goals of public policy specific to the creation of more housing by facilitating the creation of much needed housing citywide, including affordable housing opportunities. Based on review of the NYC Waterfront Consistency Revitalization (WRP) Consistency Assessment Form for the Proposed Action, it was determined that, overall, the Proposed Action would support the applicable policies and is therefore consistent with the NYC Waterfront Revitalization Program (WRP #24-051).

Socioeconomic Conditions

The Proposed Action ~~wouldnot~~would not result in significant adverse impacts related to socioeconomic conditions, including direct or indirect residential displacement, direct or indirect business displacement or adverse effects to specific industries. The Proposed Action could introduce substantial new populations, with the potential to introduce populations with higher incomes. However, the Proposed Action would introduce a range of housing types, including introduction of ADUs, would require the provision of affordable units through the UAP proposals, and would ease housing construction costs by eliminating parking requirements and other zoning changes. By increasing the supply of all types of housing, the Proposed Action will relieve the housing shortages that drive displacement pressures at the regional, citywide, and neighborhood levels.

As illustrated by the Prototypical Site Assessments and the Representative Neighborhood Assessments, the Proposed Action would not have the potential to result in significant adverse impacts with respect to socioeconomic conditions in terms of direct and indirect residential displacement and direct business displacement. Further assessment of indirect business displacement and adverse effects to specific industries is not warranted.

Prototypical Site Assessment

For the Prototypical Site Assessment, preliminary assessments were warranted for Prototypical Sites 6-1, 6-2, 7-1, and ~~7-1~~8. Under a preliminary assessment for Prototypical Sites 6-2,7-1, and ~~7-1~~8, it was determined that the incremental new population would not significantly alter socioeconomic conditions. However, for Prototypical Site 6-1, a detailed assessment was warranted but found that the potential for significant adverse impacts due to indirect residential displacement would be alleviated by the addition of new and affordable housing. For Prototypical Site 7-1, a preliminary assessment of direct business displacement was conducted but significant adverse impacts due to direct business displacement would not occur as a result of the Proposed Action.

Representative Neighborhood Assessment

For the Representative Neighborhood Assessment, preliminary assessments were warranted for New York City as a whole and one out of 18 Representative Neighborhoods (Representative Neighborhood 3) for direct residential displacement. The assessment concluded that the potentially displaced populations would not be large enough (5 percent or more of the current population) to significantly change socioeconomic conditions in the study area and further assessment was not warranted. Further, New York City as a whole and 14 out of 18 Representative Neighborhoods (1-11, 13, and 17-18) warranted a preliminary assessment of indirect residential displacement. While higher average incomes would be introduced to Representative Neighborhoods 1, 3, 4, 12, and 17, the incremental new population would not be large enough to significantly affect real estate market conditions in the study area. Detailed analysis was not warranted for any of these 14 Representative Neighborhoods. It was concluded that the other nine Representative Neighborhoods included in the preliminary assessment would introduce similar or lower average incomes to their respective neighborhood.

Community Facilities and Services

The Proposed Action could result in significant adverse community facilities impacts, specifically related to public schools and early childhood programs. An assessment of the Proposed Action's potential to result in direct and indirect effects on community facilities (early childhood programs, public schools, libraries, fire/police services, and health care facilities) was undertaken as the proposal would introduce new residential units, including affordable units that would increase demand for community facility services across the city. In some cases, early childhood programs and public elementary schools may result in impacts to program delivery based on the increase in population. Typically, these areas are at or over capacity under Existing Conditions, and these capacity constraints are further compounded by new populations introduced in the No-Action and With-Action conditions.

To illustrate the effect of the Proposed Action at the site level as well as the neighborhood level, community facilities analysis was undertaken by considering both the Prototypical Sites and the Representative Neighborhoods. In terms of direct effects, no significant adverse impacts are expected for either the Prototypical Sites or Representative Neighborhoods. In terms of indirect effects, as demonstrated by the Prototypical Site Assessment, the Proposed Action is not anticipated to result in significant impacts on community facilities. However, potential indirect impacts to public elementary schools and early childhood programs cannot be ruled out based on the results of the Representative Neighborhood Assessment. Therefore, the Proposed Action would require consideration of mitigation, as discussed in **Mitigation**.

Direct Effects

Prototypical Site Assessment

The potential development as represented by the Prototypical Sites is not anticipated to result in direct effects on community facilities. Most of the Prototypical Sites would result in residential development on a vacant lot, modify existing low-density residential buildings, consist of infill development on existing residential campuses, or convert office buildings to residential building. Thus, physical changes, either by an alteration to an existing community facility or displacement of

the facility, would not occur. Furthermore, these Prototypical Sites would not constitute a temporary direct effect. However, it is important to note that the Proposed Action would expand the geography for Article I Chapter 5 which would allow community facilities such as schools and churches to be converted to residential uses. Prototypical Site 7-2 illustrates this aspect of the Proposed Action. Although the Proposed Action, as represented by Prototypical Site 7-2, would facilitate the physical alteration and potential displacement of a community facility, religious institutions and associated schools, these direct modifications are beyond the scope of community facilities typically assessed in CEQR. Furthermore, the Proposed Action, as represented by Prototypical Site 7-2, would retrofit the portion of an existing building and would expand the existing floor area for additional residential development. Therefore, the conversion facilitated by the Proposed Action, as represented by Prototypical Site 7-2, does not constitute a direct effect. Additionally, the Proposed Action, as represented by Prototypical Site 7-2, would not have the potential to result in temporary direct effects through the temporary closing of a facility during a phase of construction. Construction activities assumed for Prototypical Site 7-2 would involve interior retrofits to an existing building, and the building would not be demolished. Moreover, the construction period would not result in a nuisance to surrounding community facility uses. Therefore, temporary direct effects are not anticipated as a result of the Proposed Action.

Representative Neighborhood Assessment

The Proposed Action would expand the geography for Article I Chapter 5 which would allow community facilities such as schools and churches to be converted to residential uses. While it is unlikely that these changes to conversion regulations would result in a direct displacement on any city-owned community facilities such as public schools, libraries, or police and fire protection services, it is possible that privately-owned community facility buildings, such as former schools, health care facilities, churches, convents or monasteries, and the like, could be converted to residential uses. As described above, faith-based institutions and associated schools and other private schools (such as charter schools) are beyond the scope of a community facilities analysis typically assessed in CEQR. While it is possible that some existing health care facilities could be displaced as a result of conversions, it is understood that any such conversions would likely occur on inactive or underutilized health care facilities, and that the closure of active health care facilities due to conversions is not likely to occur. Conversions would likely not result in temporary direct effects through the temporary closing of a facility during a phase of construction. Therefore, significant adverse impacts related to direct displacement on health care facilities would not occur, and further analysis of the Proposed Action's direct effects on health care facilities is not warranted.

Indirect Effects

Prototypical Site Assessment

The ~~27~~28 Prototypical Sites were screened to evaluate which sites may warrant further analysis for both a direct and indirect effects analysis on community facilities (i.e., early childhood programs, public schools, libraries, and fire/police services and health care facilities). For those sites where thresholds were exceeded, additional analysis was undertaken.

Of the ~~27~~28 Prototypical Sites, one site (Prototypical Site 1-5) exceeds the thresholds for an early childhood programs analysis and ~~another site~~two sites (Prototypical Site 6-1~~) exceeds~~ and Prototypical Site 8) exceed the thresholds for the elementary and intermediate schools analysis.

For Prototypical Site 1-5, the collective utilization rate for early childhood program facilities would not be above 100 percent, and the change in utilization between the No-Action and With-Action conditions would not be above five percent. Therefore, significant adverse impacts on early childhood program facilities due to the Proposed Action as represented by Prototypical Site 1-5 is not anticipated and further analysis is not warranted.

For Prototypical Site 6-1 and Prototypical Site 8, the utilization rates for both public elementary and intermediate schools in the With-Action condition would not be greater than 100 percent. Therefore, the Proposed Action, as represented by Prototypical Site 6-1 and Prototypical Site 8, would not result in a significant adverse impact to elementary or intermediate schools.

Representative Neighborhood Assessment

For the Representative Neighborhood assessment, indirect effects on libraries, fire/police services, and health care facilities are not anticipated as result of the Proposed Action.

For early childhood programs, the collective utilization rate for early childhood program facilities would be above 100 percent, and the change in utilization between the No-Action and With-Action conditions would be above five percent for one of the 18 Representative Neighborhoods or Representative Neighborhood 6, which is a high-market, mid-capacity, and high-density neighborhood. Therefore, potential impacts on early childhood programs due to the Proposed Action cannot be ruled out.

For schools, a Community School District (CSD)-level analysis was undertaken, and the potential for public elementary school impacts was identified for one CSD (CSD 1), in which Representative Neighborhood 1 and Representative Neighborhood 11 are located. The collective utilization rate for public elementary schools in the impacted CSD in the With-Action condition would be greater than 100 percent and the Proposed Action would introduce 1,123 incremental students over No-Action conditions. Therefore, the Proposed Action could result in a significant adverse impact to public elementary schools in this CSD.

Impacts on public intermediate and high schools are not anticipated. While public high schools in Staten Island would have a collective utilization rate greater than 100 percent, the change in utilization would not be greater than 5 percent points. Additionally, though the *CEQR Technical Manual* analyzes high schools at a borough-wide level, students are able to attend school outside of their neighborhoods or home boroughs. Therefore, the Proposed Action is not expected to result in significant adverse impacts to public high schools.

Open Space

Based on a detailed direct and indirect open space assessment, the Proposed Action could result in potential for direct and indirect significant adverse impacts to open space resources. Because the proposal would apply Citywide, and specific development locations are not known, it is not possible to know the exact location of future development, relative to nearby open space resources that may be affected by shadows and noise. While the proposal aims to create a modest amount of new housing in neighborhoods throughout the City, particularly in neighborhoods that already have low open space ratios or are in a Walk to Park gap area, the addition of new residents and demand on existing open space resources could exacerbate conditions, and for some neighborhood typologies, has the potential to result in adverse impacts due to indirect effects to open space.

Direct Effects

The Proposed Action, as illustrated by the Prototypical Sites and Representative Neighborhoods, would not result in the physical loss or direct displacement of publicly accessible open space or increased access to open space. As discussed in **Chapter 7, Shadows**, open space resources that have sunlight sensitive features could have shadows impacts. Incremental shading from the Proposed Action could be long duration in which open space resources could receive greater than 4 hours of incremental shading during the growth season. Given the non-site-specific nature of this assessment and in the absence of a detailed vegetation survey that assesses the shade tolerance and sunlight requirements of the species found in the open spaces resources that were analyzed and given the fact that the overall incremental shadow duration is greater than 4 hours, a significant adverse impact on the viability of the vegetation in these resources cannot be ruled out. Therefore, it is anticipated that incremental shading could potentially have adverse effects.

As discussed in **Chapter 16, Air Quality**, there is no potential for any adverse air quality impacts from stationary sources, parking facilities or mobile sources generated by the project. Trips generated by the proposed sites on a neighborhood level are also not expected to create any air quality impacts. As such, no adverse air quality impacts are anticipated on a site-specific level.

A noise assessment was conducted to determine whether the Proposed Action would significantly increase sound levels from mobile and stationary sources at existing noise receptors. Mobile sources that would be generated by individual developments under the Proposed Action were assessed to evaluate the potential for mobile source noise impacts on existing noise receptors. As illustrated by the Prototypical Sites, the assessment concluded that none of the ~~27~~28 Prototypical Sites would have the potential to result in significant adverse noise impacts. Additionally, as the Proposed Action would primarily result in additional residential development, significant adverse impacts on noise-sensitive open space receptors due to stationary sources are not anticipated. All rooftop mechanical equipment, including air conditioner compressors, for any potential development would have to be enclosed and would have to comply with New York City Noise Code requirements, which would limit noise levels generated by such equipment to 65 dBA during daytime (7 AM to 10 PM) and 55 dBA during nighttime (10 PM to 7 AM). Therefore, project-generated changes in ambient noise levels are not expected to result in significant adverse impacts to existing open space resources. Based on the foregoing, potential direct impacts to open spaces cannot be ruled out.

Indirect Effects

Prototypical Site Assessment

Overall, almost all of the Prototypical Sites that warranted a detailed open space assessment, except for Prototypical Sites 6-1, 6-2, and ~~6-2~~8, demonstrated open space ratio changes between the No-Action condition and With-Action condition that would fall below the percent change thresholds indicating potential for significant adverse impact. For Prototypical Site 6-1, the percent change between the No-Action and With-Action conditions would exceed the CEQR impact threshold of 5 percent for the active, passive, and total open space ratios. For Prototypical Sites 6-2 and 8, the percent change between the No-Action and With-Action conditions would exceed the threshold of 1 percent for the active, passive, and total open space ratios indicating potential for significant adverse impact. The quantitative open space analysis did not consider qualitative factors such as additional open space resources that could be located within a half mile of each site but are outside of the residential study area's selected census tracts. Thus, residents in the area could use those resources

for their active and passive recreational needs. All of the Prototypical Sites, except for Prototypical Sites 6-1, 6-2, and ~~6-2~~8, would have minimal effects on residential open space ratios. However, the potential for significant adverse impacts to open space as a result of the Proposed Action cannot be ruled out because this assessment conservatively assumed that each site could be located within a walk-gap area and because definitive information cannot be disclosed on qualitative factors given the non-site-specific nature of this assessment. Therefore, the Proposed Action could result in significant adverse indirect open space impacts and would require consideration of mitigation, as discussed in **Chapter 22, Mitigation**.

Representative Neighborhood Assessment

The quantitative analysis showed that the 18 Representative Neighborhoods have a range of open space ratios in the With-Condition from as little as 0.094 acres per 1,000 residents (Representative Neighborhood 3) to as high as 37.570 acres per 1,000 residents (Representative Neighborhood 1).

Due to population increases in each Representative Neighborhood, the absolute change in total open space ratios show a decrease in the range of 0.004 acres per 1,000 residents (Representative Neighborhoods 3 and 8) to a decrease of 1.165 acres per 1,000 residents (Representative Neighborhood 1).

Percentage changes between the No-Action condition and With-Action condition range from a decrease of 12 percent to a decrease of 1 percent. Despite these percentage changes in ratios, 13 of the Representative Neighborhoods would not result in an open space impact based on their thresholds indicating potential for significant adverse impact; therefore, significant adverse impacts are not anticipated as a result of the Proposed Action.

Representative Neighborhood 2 has a percentage change decrease of 12 percent, which exceeds the 5 percent threshold for the area. However, a possible adverse open space impact to the Representative Neighborhood is not anticipated because the open space ratios exceed the City guideline of 2.5 acres per 1,000 residents.

The remaining four Representative Neighborhoods—3, 10, 11, 16—exceed the percentage change thresholds for ratios that fall below the City guideline of 2.5 acres per 1,000 residents. Thus, these changes signify a possible adverse open space impact. As such, the Proposed Action could result in significant adverse indirect open space impacts and would require consideration of mitigation, as discussed in **Chapter 22, Mitigation**.

Shadows

The Proposed Action could result in significant adverse shadow impacts. As illustrated by the Prototypical Sites and Representative Neighborhoods, while in most cases the Proposed Action is not expected to result in significant adverse shadow impacts, due to the non-site specific nature of the Proposed Action it is possible that at some locations in the city, new development could be located in a configuration adjacent to open spaces, historic, and/or natural resources with sunlight sensitive features such that incremental shading could affect the resource's condition or the public's enjoyment of the resource. As such, the Proposed Action could result in significant adverse shadows impacts and would require consideration of mitigation, as discussed in **Chapter 22, Mitigation**.

Prototypical Site Assessment

A typical shadows assessment consistent with *CEQR Technical Manual* guidelines is site-specific. However, due to the scale of the Proposed Action and given its non-site-specific nature, it is difficult to predict specific shadows impacts from the kind of development that would occur on each potentially affected site across the city. Therefore, the Representative Neighborhood Assessment to determine shadows impacts from the Proposed Action relies on the conclusions of the Prototypical Site Assessment detailed in **Chapter 7, Shadows**.

The potential for the Proposed Action to result in significant adverse shadows impacts was undertaken by assessing the ~~27~~28 different Prototypical Sites to evaluate their potential for shadow increments on potential resources of concern, including open spaces, historic resources with sunlight sensitive features, and natural resources. The ~~27~~28 Prototypical Sites were screened, and a detailed analysis was conducted for the two sites that exceeded the threshold per CEQR analyses guidance (Prototypical Sites 1-3B and 1-5) along with several additional sites that would produce mid- to high-density buildings with incremental height increases of between 10 and 50 feet (Prototypical Sites 1-2A, 1-3B, 1-5, 3-2B, 4-1, ~~6~~7-2, and ~~7-2~~8).

Open Space Resources

Based on the detailed assessment of the seven Prototypical Sites, the analysis concluded that in most cases, there would not be the potential for significant adverse shadows impacts. However, as represented by Prototypical Sites 3-2B and ~~6-2~~8, it is possible that new development could result in incremental shading of a long duration (i.e., longer than four hours) or that would cause a resource to no longer receive adequate sunlight within the growing season (at least the four to six hours specified in the *CEQR Technical Manual*). Given the non-site-specific nature of this assessment and in the absence of a detailed vegetation survey that assesses the shade tolerance and sunlight requirements of the species found in the open spaces resources that were analyzed, a significant adverse impact on the viability of the vegetation in the resources found at these two Prototypical Sites cannot be ruled out. Similarly, because the shadow duration is greater than 4 hours, a significant adverse impact on the public's enjoyment and utilization of these spaces cannot be ruled out. Therefore, it is anticipated that incremental shading could potentially have significant adverse impacts. As such, the Proposed Action would require consideration of mitigation, as discussed in **Mitigation**.

Historic Resources

The analysis considered the effects on historic resources by making conservative assumptions about the presence of sunlight sensitive features (e.g., stained-glass windows) within the vicinity of certain Prototypical Sites. Based on the Prototypical Site Assessment, it was concluded that significant adverse impacts on historic resources were not anticipated. However, because of the non-site-specific nature of the Proposed Action, it is possible that at some locations in the city, new development could be located in a configuration adjacent to a historic resource with sunlight sensitive features such that incremental shading could affect the public's enjoyment of the resources. Therefore, the potential for impact cannot be ruled out. As such, the Proposed Action could result in significant adverse shadows impacts and would require consideration of mitigation, as discussed in **Mitigation**.

Natural Resources

The analysis of potential shadows impacts on natural resources consisted of an assessment of the potential for one of the Prototypical Sites (Site 1-5) to result in impacts on an adjacent surface water body. As shown in that assessment, the prototypical site would not result in significant adverse impacts on the natural resources.

Where applicable, any potential impacts to federal and/or New York State listed species due to project-generated shading across the 18 Representative Neighborhoods, and citywide, would be subject to review and regulation by the U.S. Fish and Wildlife Service (USFWS), National Oceanic and Atmospheric Administration (NOAA) Marine Fisheries, and/or the New York State Department of Environmental Conservation (NYSDEC) under regulatory programs designed to protect listed species and their habitats. Therefore, significant adverse impacts are not anticipated as a result of the Proposed Action. However, given the non-site-specific nature of the Proposed Action, it is possible that at some locations in the city, new development could be located in a configuration adjacent to a natural resource such that incremental shading could affect the resource's condition. Therefore, the potential for shadow impacts on natural resources cannot be ruled out. As such, the Proposed Action could result in significant adverse shadows impacts and would require consideration of mitigation, as discussed in **Mitigation**.

Representative Neighborhood Assessment

The Representative Neighborhood Assessment aims to estimate the range of conditions that could occur across different neighborhoods in the city and estimate development that might reasonably be expected to occur. As described above, a typical shadows assessment consistent with *CEQR Technical Manual* guidelines is site-specific. However, due to the scale of the Proposed Action and given its non-site-specific nature, it is difficult to predict specific shadows impacts from the kind of development that would occur on each potentially affected site across the city. Therefore, the Representative Neighborhood Assessment to determine shadows impacts from the Proposed Action relies on the conclusions of the Prototypical Site Assessment.

As described above, the Proposed Action would facilitate the construction of some buildings that are greater than 50 feet in height or new buildings that could be located adjacent to sunlight sensitive resources. As illustrated by the Prototypical Sites, the variety of building typologies that would be introduced by the Proposed Action could potentially affect various sunlight sensitive resources ranging from open spaces, historic resources, to natural resources to assess. Further, it is possible that future development in each of the Representative Neighborhoods or elsewhere in the city could occur in clusters, of which could be located near sunlight-sensitive resources, potentially resulting in cumulative incremental shading introduced by multiple new buildings. Therefore, the potential for significant adverse shadow impacts cannot be ruled out. As such, the Proposed Action would require consideration of mitigation, as discussed in **Mitigation**.

Open Space Resources

As illustrated by the Prototypical Sites, the analysis concluded that in most cases (with the exception of Prototypical Sites 3-2B and ~~6-2~~8), there would not be the potential for significant adverse shadows impacts. However, it is possible that future development in each of the Representative Neighborhoods or elsewhere in the city could occur in clusters, of which could be located near sunlight-sensitive open space resources. As such, future development introduced by the Proposed

Action has the potential to result in cumulative incremental shading introduced by multiple new buildings, which could result in significant adverse impacts to nearby open space resources. Further, given the non-site-specific nature of this assessment and in the absence of a detailed vegetation survey that assesses the shade tolerance and sunlight requirements of the species found in the potentially effected open spaces resources, a significant adverse impact on the viability of the vegetation on such resources cannot be ruled out. Additionally, neighborhood parks could contain other sunlight-sensitive recreational facilities (spray showers, pools), the utilization of which is the highest in the warmer months of the year. Incremental shading could affect the public's enjoyment of these facilities because the shading could occur in the afternoon hours of the analysis day, when park utilization is typically high. Therefore, incremental shading on open space resources due to future development within the Representative Neighborhoods and elsewhere throughout the city could potentially have significant adverse shadow impacts. As such, the Proposed Action would require consideration of mitigation, as discussed in **Mitigation**.

Historic Resources

As illustrated by the Prototypical Sites, the analysis considers the effects on historic resources by making conservative assumptions about the presence of sunlight sensitive features (e.g., stained-glass windows) within the vicinity of certain sites. Due to the non-site-specific nature of the Proposed Action, it is possible that at some locations in the city, new development could be located in a configuration adjacent to a historic resource with sunlight sensitive features such that incremental shading could affect the public's enjoyment of the resources, and therefore, it was determined that the potential for impact cannot be ruled out. Further, it is possible that future development in each of the Representative Neighborhoods or elsewhere in the city could occur in clusters, of which could be located near sunlight-sensitive historic resources. As such, future development introduced by the Proposed Action has the potential to result in cumulative incremental shading introduced by multiple new buildings, which could result in significant adverse impacts to nearby sunlight-sensitive historic resources. Therefore, incremental shading on sunlight-sensitive historic resources due to future development within the Representative Neighborhoods and elsewhere in the city could potentially result in significant adverse shadow impacts. As such, the Proposed Action would require consideration of mitigation, as discussed in **Mitigation**.

Natural Resources

As illustrated by the Prototypical Sites, the analysis of potential shadows impacts on natural resources consisted of an assessment of the potential for one of the Prototypical Sites (Site 1-5) to result in impacts on an adjacent surface water body. As shown in that assessment, the prototypical site would not result in significant adverse impacts on the natural resources. Where applicable, any potential impacts to federal and/or New York State listed species due to project-generated shading across the 18 Representative Neighborhoods, and citywide, would be subject to review and regulation by the U.S. Fish and Wildlife Service (USFWS), National Oceanic and Atmospheric Administration (NOAA) Marine Fisheries, and/or the New York State Department of Environmental Conservation (NYSDEC) under regulatory programs designed to protect listed species and their habitats.

However, given the non-site-specific nature of the Proposed Action, it is possible that at some locations in the city, new development could be located in a configuration adjacent to a natural resource such that incremental shading could affect the resource's condition. Furthermore, it is

possible that future development in each of the Representative Neighborhoods or elsewhere in the city could occur in clusters, of which could be located near sunlight-sensitive natural resources. As such, future development introduced by the Proposed Action has the potential to result in cumulative incremental shading introduced by multiple new buildings, which could result in significant adverse impacts to nearby natural resources. Given the non-site specific nature of this assessment and in the absence of a detailed vegetation survey that assesses the shade tolerance and sunlight requirements of the species found in the potentially effected natural resources, a significant adverse impact on such resources cannot be ruled out. Therefore, incremental shading on open space resources due to future development within the Representative Neighborhoods and elsewhere throughout the city could potentially have significant adverse shadow impacts. As such, the Proposed Action would require consideration of mitigation, as discussed in **Mitigation**.

Historic Resources

The Proposed Action could potentially result in significant adverse impacts to archaeological resources if in-ground disturbance occurs on sites where archaeological remains exist. The Proposed Action could potentially result in direct impacts to architectural resources as well as indirect impacts, including changes in visual context. As such, the Proposed Action could result in significant adverse impacts on architectural resources and would require consideration of mitigation, as discussed in **Mitigation**.

Archaeological Resources

The Proposed Action consists of changes in zoning that could result in new in-ground disturbance. Since it is not possible to conclude where and to what extent additional development might occur, the possibility of additional in-ground disturbance cannot be eliminated. If in-ground disturbance occurs on sites where archaeological remains exist, significant adverse impacts could occur.

Architectural Resources

Because this is a non-site-specific analysis and a specific study area for architectural resources cannot be defined, an inventory of known and potential historic resources was not conducted. Due to the prevalence of historic resources throughout the city, resources may be located on, near, or adjacent to the Prototypical Sites or within the Representative Neighborhoods.

It is expected that the Proposed Action would not result in any significant adverse direct impacts to known architectural resources. Privately owned properties that are NYCLs or in New York City historic districts would continue to be protected by existing laws and regulations. However, previously unidentified architectural resources could be impacted by new development (such as conversions) that potentially alter character defining features. As a result, the potential for direct impacts to previously unidentified architectural resources cannot be eliminated.

Although the Proposed Action would generally result in taller buildings and/or buildings occupying a larger footprint, the Prototypical Sites and Representative Neighborhoods are within areas that contain densely developed streets, and it is anticipated that any allowable increase in the height of new buildings would be compatible with other buildings of similar height and size that exist in the surrounding neighborhood. Minimal potential for contextual impacts are anticipated, however new developments resulting from the Proposed Action could alter the setting or visual context of architectural resources, and it is possible that these alterations would result in significant adverse

contextual or visual impacts. While it is not expected that the Proposed Action would alter the relationship of architectural resources to the streetscape, development under the Proposed Action could change or obstruct public views of architectural resources in some instances, depending on the orientation of the development site to the architectural resource. Significant elements of architectural resources are anticipated to remain visible in view corridors on public streets, but the possibility that this may not be the case cannot be eliminated. As such, the potential for the Proposed Action to result in any significant adverse indirect impacts on architectural resources cannot be ruled out.

While the Proposed Action would potentially result in incremental shadows being cast on historic resources, it was determined that incremental shadows are not anticipated to significantly affect any historic architectural resources. However, given the non-site-specific nature of the Proposed Action, and that it is not possible to know where future development sites would be located, the potential for shadow impacts on architectural resources cannot be eliminated.

Urban Design and Visual Resources

The Proposed Action could potentially result in significant adverse impacts to visual resources. There is potential for development under the Proposed Action to change or obstruct public views of visual resources in some instances, depending on the orientation of the development site to the visual resource. While it is anticipated that significant elements of visual resources would remain visible in view corridors on public streets, the possibility that this may not be the case cannot be ruled out. As such, the Proposed Action could result in significant adverse impacts to visual resources and would require consideration of mitigation, as discussed in **Mitigation**.

Prototypical Site Assessment and Representative Neighborhoods Analysis

An analysis of Prototypical Sites and Representative Neighborhood was conducted to determine potential impacts on urban design and visual resources that would result from the Proposed Action. Of the ~~27~~28 Prototypical Sites, 10 Prototypical Sites were selected to advance the urban design and visual resources analysis: Prototypical Sites 1-2A, 1-3B, 1-4A, 1-4B, 1-5, 3-2B, 4-1, 6-1, ~~6~~7-2, and ~~7-2~~8. The ten Prototypical Sites were selected based on location and whether the With-Action condition would result in an incremental height increase greater than 10 feet or produce mid- to high-density buildings.

A typical urban design and visual resources assessment consistent with *CEQR Technical Manual* guidelines is site-specific. However, due to the scale of the Proposed Action and given its non-site-specific nature, it is difficult to predict specific urban design and visual resources impacts from the kind of development that would occur on each potentially affected site across the city. Therefore, the Representative Neighborhood Assessment to determine urban design and visual resources impacts from the Proposed Action relies on the conclusions of the Prototypical Site Assessment.

Urban Design

The Proposed Action would result in the modification of yard, height, and setback requirements and an increase in built floor area beyond what would be allowed as-of-right or in the future absent the Proposed Action. It is anticipated that any allowable increase in the height or bulk of new buildings would be compatible with other buildings of similar height and size that exist in the surrounding neighborhoods. It is not expected that the Proposed Action would result in buildings that would be substantially different in character or arrangement than those that currently exist in the surrounding

neighborhoods. It is also not expected that the Proposed Action would result in any major changes to block shapes, street patterns or hierarchies. Furthermore, new residential development that would be facilitated by the Proposed Action is expected to occur on lots where residential development would have occurred within the No-Action condition (with the exception of newly available conversion sites due to the Proposed Action) and would therefore be consistent with expected uses of the surrounding neighborhood. As a result, the Proposed Action would not result in significant adverse impacts to urban design.

Visual Resources

As the Proposed Action has citywide applicability, it is possible that new development would be located near visual resources. However, it is not expected that the Proposed Action, as illustrated by the Prototypical Site Assessment, would alter the relationship of visual resources to the streetscape. As exemplified by Prototypical Site 1-5 under With-Action Condition B, waterfront development that would occur as a result of the Proposed Action (10 of the 18 Representative Neighborhoods contain waterfront properties) would be consistent with zoning requirements to provide public waterfront access and maintain visual corridors. Additionally, significant adverse impacts related to shadows on waterfront natural resources are not expected to occur.

There is however potential for development under the Proposed Action to change or obstruct public views of visual resources in some instances, depending on the orientation of the development site to the visual resource. While it is anticipated that significant elements of visual resources would remain visible in view corridors on public streets, the possibility that this may not be the case cannot be ruled out. As such, the potential for the Proposed Action to result in any significant adverse indirect impacts on visual resources cannot be ruled out.

Natural Resources

The Proposed Action could result in significant adverse natural resources impacts. Overall, future development sites within the Representative Neighborhoods would be composed largely of landcover and habitats that have been created or significantly altered by humans, including buildings, pavement, and other unvegetated/impervious surfaces interspersed with limited areas of landscaping that do not support significant areas of naturally vegetated habitats. Naturally vegetated habitats, including various wooded, tidal wetland, and freshwater wetland community types occur largely within parkland and other public or municipally owned lands, and therefore would not be subject to clearing or development under the Proposed Action. With respect to wildlife, given that that the expected landcover and habitat types at future development sites would replicate existing conditions, a similar fauna of urban-adapted, generalist species that can tolerate disturbed/ developed conditions and high levels of human presence and activity would continue under the Proposed Action.

However, while the likelihood of impacts to natural resources is low, the exact extent of effects to natural resources is unknown, due to the non-site-specific nature of the Proposed Action and because it not possible to determine exactly where and to what extent natural resources would be affected by future development. Without an assessment of specific development sites, the, extent, character, and quality of natural resources cannot be definitively demonstrated. As such, the possibility of adverse effects to natural resources cannot be eliminated. Since development resulting from the Proposed Action would be as-of-right, there would be no mechanism for the City to reduce

or eliminate such impacts to resources that are not already protected under City, state, and federal regulations.

Therefore, as illustrated by the Prototypical Sites and Representative Neighborhoods described in more detail in **Chapter 10, Natural Resources**, while it is unlikely the Proposed Action would result in adverse impacts to natural resources, due to the non-site-specific nature of the Proposed Action the potential for adverse impacts to natural resources cannot be ruled out and would require consideration of mitigation, as discussed in **Mitigation**.

Prototypical Site Assessment

A screening assessment was conducted for each of the ~~27~~28 prototypical sites. Each site was analyzed to evaluate whether the site would warrant an analysis of natural resources. Based on the screening assessment of the ~~27~~28 Prototypical Sites, while significant adverse impacts to natural resources would be unlikely, the potential for the Proposed Action to result in adverse effects to natural resources could not be ruled out.

While the Proposed Action would induce development throughout the City's residential districts, any potential development is not likely to significantly affect the many natural areas and parkland located throughout the City. In terms of the Prototypical Site Assessment, development projected under the Proposed Action is expected to occur exclusively on the Prototypical Sites, resulting in disturbance of sites previously disturbed and/or developed with buildings and pavement, some of which also include limited landscaped areas. The existing land coverages of the Prototypical Sites and their adjacent properties are comprised primarily of unvegetated, impervious surfaces and possess minimal habitat value for most vegetation and wildlife species, apart from a limited number of urban-adapted species that are common to the City's built settings and environments. Accordingly, the Proposed Action's potential changes in lot coverage at some of the Prototypical Sites would not result in significant adverse effects to vegetation or wildlife species in the New York City metropolitan area. The urban habitat conditions that characterize the Prototypical Sites do not provide habitat for the majority of federal and New York State listed species known to occur in New York City. However, protected raptors such as Peregrine Falcon and Red-tail Hawk are known to use building exteriors for nesting and several species of bats that occur in New York City are known to use abandoned buildings as roost sites. Any potential direct or indirect impacts to federal and or/ New York State listed species due to development (e.g., noise, shadows, light, etc.) would be subject to review and regulation by federal and/or New York State regulatory programs designed to protect listed species and their habitats.

However, as detailed in **Chapter 10, Natural Resources**, while the likelihood of impacts to natural resources is low, the exact extent of effects to natural resources is unknown, due to the non-site-specific nature of the Proposed Action and because it not possible to determine exactly where and to what extent natural resources would be affected by future development. Although the Prototypical Site Assessment analyzes potential effects on existing sites within the city, the, extent, character, and quality of natural resources at future development sites cannot be definitively demonstrated. As such, the possibility of adverse effects to natural resources cannot be eliminated. Since development resulting from the Proposed Action would be as-of-right, there would be no mechanism for the City to reduce or eliminate such impacts to resources that are not already protected under City, state, and federal regulations.

Therefore, based on the foregoing assessment, while significant direct or indirect effects to natural resources as a result of the Proposed Action are unlikely, due to the non-site-specific nature of the Proposed Action, the potential for adverse effects to natural resources cannot be ruled out.

Representative Neighborhood Assessment

An assessment was undertaken to understand the potential cumulative effects of future development within the 18 Representative Neighborhoods on natural resources and concluded that while impacts would be unlikely, the potential for the Proposed Action to result in adverse effects to natural resources could not be ruled out.

Any future development sites within the Representative Neighborhoods would be composed largely of landcover and habitats that have been created or significantly altered by humans, including buildings, pavement, and other unvegetated/impervious surfaces interspersed with limited areas of landscaping that do not support significant areas of naturally vegetated habitats. The expected landcover and habitat types at the future development sites would replicate existing conditions, with the potential for a minimal decrease in available landscaped habitat.

Naturally vegetated habitats, including various wooded, tidal wetland, and freshwater wetland community types, occur within more than half of the Representative Neighborhoods. However, as these communities occur largely within parkland and other public or municipally owned lands, they would not be subject to clearing or development under the Proposed Action. Any potential development at sites located within areas located proximate to regulated tidal or freshwater wetlands would be subject to New York State and/or federal agency review and permitting under regulatory programs designed to protect, preserve, and enhance these resources.

With respect to wildlife, given that that the expected landcover and habitat types within the Representative Neighborhoods would replicate existing conditions, a similar fauna of urban-adapted, generalist species that can tolerate disturbed/developed conditions and high levels of human presence and activity would continue under the Proposed Action. The majority of development sites within the Representative Neighborhoods have already been developed with buildings and impervious surfaces and therefore support the limited fauna described above. Although potential impacts to resident wildlife species from development at currently vacant sites are greater as compared to the species impacts at sites that have already been developed, the overall effects to citywide species population levels and species diversity are not expected to be substantial. Moreover, any potential minimal effects would be partially mitigated at portions of some of the development sites through habitat replacement with vegetated landscaped areas. Significantly, as the various wooded, tidal, and freshwater wetland habitats that occur at more than half of the Representative Neighborhoods are located primarily within parkland and other public or municipally owned lands that would not be subject to development, the substantially larger and more diverse wildlife species assemblages that utilize these sites would not be subject to habitat loss or other direct impacts under With-Action conditions.

The urban habitat conditions that characterize the development sites within the Representative Neighborhoods do not provide habitat for the majority of federal and New York State listed species known to occur in New York City. However, protected raptors such as Peregrine Falcon and Red-tail Hawk are known to use building exteriors for nesting and several species of bats that occur in New York City are known to use abandoned buildings as roost sites. Wooded areas and wetlands that may support rare/protected species occurrences within some of the Representative Neighborhoods occur

within public or municipally owned lands that would not be subject to clearing, development, or other direct effects under the Proposed Action. Any potential direct or indirect impacts to federal and or/ New York State listed species due to development (e.g., noise, shadows, light, etc.) would be subject to review and regulation under federal and/or New York State regulatory programs designed to protect listed species and their habitats.

Construction related displacement of the resident urban-adapted wildlife species that inhabit the Representative Neighborhoods is expected to be minimal and temporary. Following construction, a similar fauna of urban-adapted species are expected to continue to occupy the Representative Neighborhoods. Any potential discharge of stormwater and/or pollutants from development to surface waters during or after construction would be subject to New York State regulatory review and permitting under regulatory programs designed to protect surface water resources and water quality.

However, the non-site-specific nature of the Proposed Action makes it difficult to determine whether future development resulting from the Proposed Action would take place on a parcel containing natural resources. Without an assessment of specific development sites, the presence of natural resources cannot be definitely demonstrated. As such, the possibility of impacts related to natural resources cannot be eliminated. Since development resulting from the Proposed Action would be as-of-right, there would be no mechanism for the City to reduce or eliminate such impacts to resources that are not already protected under City, New York State, and federal regulations.

Therefore, based on the Representative Neighborhood Assessment, while significant adverse impacts to natural resources would be unlikely, the potential for the Proposed Action to result in adverse effects to natural resources cannot be ruled out.

Hazardous Materials

The Proposed Action could result in significant adverse impacts to hazardous materials. Impacts are likely to be limited considering the slight incremental increase of exposure to potentially contaminated subsurface hazardous materials in the With-Action when compared to the No-Action condition. As development under the With-Action condition would occur as-of-right, significant adverse impacts to hazardous materials could occur, and would require consideration of mitigation, as discussed in **Mitigation**.

Prototypical Site Assessment

As illustrated by the Prototypical Sites, the Proposed Action could potentially result in adverse hazardous materials impacts. In accordance with the methodology outlined in the *CEQR Technical Manual*, a hazardous materials assessment of ~~27~~28 prototypical sites was conducted. The assessment analyzed the potential impacts of hazardous materials as they pertain to the Proposed Action and compared the differences between the No-Action and With-Action scenarios on the prototypical sites.

The extent of the effects of hazardous materials are unknown because of the non-site-specific nature of the Proposed Action and because it is not possible to determine exactly where and to what extent additional in-ground disturbance or conversion may occur in the future with the Proposed Action. Without an assessment of specific development sites, the absence of hazardous materials cannot be definitively demonstrated. As such, the possibility of impacts related to hazardous materials cannot be eliminated. To mitigate potential residential exposure to soil vapor intrusion, newly developed residential buildings would need soil vapor barriers installed on the ground and sub-ground levels. Since development resulting from the Proposed Action would be as-of-right, there would be no

mechanism for the City to conduct or require a program to test for hazardous materials contamination, or to mandate the remediation of such materials.

Representative Neighborhood Assessment

A Representative Neighborhood Assessment was conducted to understand the potential for hazardous materials impacts. The assessment, which was similar to that conducted for prototypical sites, included a screening of 18 Representative Neighborhoods to evaluate neighborhood-wide hazardous material impacts under the With-Action condition.

The non-site-specific nature of the Proposed Action makes it difficult to determine whether future development resulting from the Proposed Action would take place on a parcel subject to a remedial program. Without an assessment of specific development sites, the absence of hazardous materials cannot be definitively demonstrated. As such, the possibility of impacts related to hazardous materials cannot be eliminated. To mitigate potential residential exposure to soil vapor intrusion, newly developed residential buildings would need soil vapor barriers installed on the ground and sub-ground levels. Since development resulting from the Proposed Action would be as-of-right, there would only be a mechanism for the City to require a hazardous materials assessment, or to mandate the remediation of such materials, on select parcels that have already been (E) designated because of prior zoning actions.

Water and Sewer Infrastructure

The Proposed Action would not result in significant adverse impacts related to water demand or sanitary and stormwater infrastructure. While the Proposed Action includes proposals that would increase both sanitary and stormwater flows throughout the City, and while Representative Neighborhoods that are expected to increase maximum residential FARs or increase allowable impervious coverage could potentially require sewer upgrades to accommodate for the increase in stormwater and sanitary flows, none of the City's Wastewater Resource Recovery Facilities (WRRFs) are expected to exceed their operational capacities under the With-Action condition.

Potential Impacts on Sanitary and Storm Systems

As described in **Chapter 12, Water and Sewer Infrastructure**, there are a number of proposals that would not introduce density beyond what is currently allowed by zoning. Proposals for low-density areas, campuses, parking, and dwelling unit factors do not introduce new allowable housing capacities but relieve zoning constraints to allow for existing zoning capacities to be met. Accessory Dwelling Units would likely provide extra space for multigenerational families without increasing densities. Since the City's sewers are sized and designed based on the maximum floor area ratio (FAR) of zoning districts, the incremental increases from these proposals would not be considered to be significant or adverse.

Proposals that would increase sanitary flows include the "Low-Density Plus" and Universal Affordability Preference (UAP). "Low-Density Plus" proposals would increase population densities by providing additional residential FAR and building height in low density commercial districts. The UAP proposal would allow for an increase in FAR for affordable housing in all medium- and high-density districts. Because the "Low-Density Plus" and UAP proposals increase the maximum FAR in their respective zoning districts, it is possible that the City's sewers would need to be upgraded to accommodate for the increase in sanitary flows.

The Proposed Action seeks to provide more housing throughout the City, and as a result, many of the proposals would increase the allowable impervious coverage over the No-Action condition. Proposed developments of a certain size would be required to comply with the Unified Stormwater Rule (USWR). The USWR aims to regulate stormwater release rates into the City's sewers. Although the Proposed Action would result in an increase in impervious coverage, the USWR would preclude ~~the potential~~ impacts from much of the ~~With-Action condition.~~development under future conditions and improve neighborhood stormwater conditions. Furthermore, the qualitative assessment of projects not subject to the USWR, including an assessment of backyard accessory dwelling units (ADUs), would not result in an increase in impervious coverage that is significant or adverse.

Prototypical Site Assessment

A screening assessment was conducted for each of the Prototypical Sites. Each site was analyzed to evaluate whether the site would warrant an analysis of the City's water and sewer infrastructure.

Based on the screening assessment, Prototypical Site 6-1 would result in the largest total daily water demand of approximately 0.40 million gallons per day (mgd) but would be under the threshold of 1 mgd provided in the *CEQR Technical Manual*; therefore, no analysis of the water supply system would be warranted for the Prototypical Sites. Prototypical Site 6-1 would result in a net increase of 642 residential units in a combined sewered area. Therefore, a preliminary analysis of the City's wastewater conveyance and treatment system was undertaken for this site. No other Prototypical Site exceeds the incremental development threshold provided in the *CEQR Technical Manual* for analysis of sanitary sewage. Prototypical ~~Site~~Sites 6-2 and 8 would result in the increase of impervious surface within a drainage area identified by the New York City Department of Environmental Protection (NYC DEP) as an area of concern, and a preliminary analysis of the City's stormwater conveyance system was prepared for this site. Although Prototypical Sites 6-1, 6-2, and ~~6-2~~8 would create new demand for water and treatment of sewage and stormwater in comparison to the No-Action condition, based on the methodology set forth in the *CEQR Technical Manual*, the incremental increases would be well within the City's sewer system capacity, and would not be considered significant or adverse.

Representative Neighborhood Assessment

A screening assessment was conducted for 18 Representative Neighborhoods to evaluate the potential increase in water demand and sewage generation throughout the City. Based on the screening assessment, Representative Neighborhood 3 would result in the largest total daily water demand of approximately 10.23 mgd, which is an increment of 0.33 mgd compared to the No-Action condition. Because the incremental increase of the Proposed Action does not exceed 1 mgd, the With-Action water demand would not be considered significant or adverse. Sanitary flows from Representative Neighborhoods 7, 9, 10, 17, and 18 would result in an increase of 2 percent within a drainage area, identified by NYC DEP as an area of concern. Additionally, Representative Neighborhood 2 would result in an increase of sanitary flows over 5 percent~~.~~ over the No-Action condition. Therefore, an additional assessment was conducted for the City's 14 Wastewater Resource Recovery Facilities (WRRFs). The assessment compares the combined No-Action and With-Action wastewater flows for contributing areas to each WRFF. Tallman Island, Jamaica, Port Richmond, and Oakwood Beach WRRFs exceed an incremental increase of 5 percent over the No-Action condition. However, none of the City's WRRFs are expected to exceed their operational capacities due to the Proposed Action.

The Proposed Action is expected to induce a small amount of housing in every neighborhood Citywide, and the non-site-specific nature of the action makes it impossible to know where future development would be located. Therefore, it is not possible to use a hydraulic analysis to understand with accuracy if the Proposed Action would affect individual conveyance elements, pumping stations, or regulators. However, connecting to the City's sewer system requires certification of sewer availability from NYC DEP. New development sewer certification review ensures that sufficient capacity exists in both the sewer fronting the lot of the proposed new development or alteration as well as in downstream sewers to accommodate additional discharges from new development. If adequate capacity is not available, infrastructure improvements, sewer extensions, or onsite detention/retention systems that offset increased sanitary or stormwater flows may be required before sewer connections can be approved. Therefore, since the Proposed Action would not result in exceedances of planned WRRF capacity, and NYC DEP capital planning processes would not be affected, the Proposed Action would not have a significant adverse impact to citywide sanitary flow infrastructure.

With regards to stormwater flows, all new developments of a certain size must comply with the Unified Stormwater Rule. While components of the Proposed Action could result in an overall reduction of pervious surfaces throughout the city and an increase in stormwater flows~~, the existing stormwater conveyance system throughout the City is expected to accommodate the incremental stormwater flows generated by the Proposed Action.~~ over large areas, the increase of stormwater flows are not considered to be significantly adverse. The Proposed Action would result in dispersed development, where no one site would cause an impact to stormwater flows (as demonstrated in the Prototypical Site Assessment). Further, the collective change from the proposals is too small and varied to be considered to have a significant effect to citywide stormwater flows; it is impossible to know the future locations of new development; and new development under the Proposed Action in many cases may result in more stormwater management that could make conditions better for surrounding properties. Additional assessment also demonstrates that backyard ADUs not produce significant changes in incremental stormwater flows, even under conservative surface coverage assumptions. Therefore, the Proposed Action would not have a significant adverse effect to citywide stormwater flows.

Solid Waste and Sanitation Services

The Proposed Action would not result in significant adverse impacts to solid waste and sanitation services. Overall, while the Proposed Action would result in increases in solid waste generation across the City, the overall production of solid waste would be expected to be able to be accommodated by existing solid waste management capacity.

Prototypical Site Assessment

Based on the solid waste generation rates provided in the *CEQR Technical Manual*, none of the Prototypical Sites exceed the 50-ton per week or more threshold. Therefore, a detailed solid waste and sanitation services assessment is not warranted and significant adverse impacts to solid waste and sanitation services is not anticipated as a result of the Proposed Action as illustrated by the Prototypical Sites.

Representative Neighborhood Assessment

Based on the solid waste generation rates provided in the *CEQR Technical Manual*, none of the Representative Neighborhoods exceed the 50-ton-per-week or more threshold. Therefore, a detailed solid waste and sanitation services assessment is not warranted and significant adverse impacts to solid waste and sanitation services is not anticipated as a result of the Proposed Action as illustrated by the Representative Neighborhoods.

Energy

The Proposed Action would not result in significant adverse impacts to energy. Overall, while the Proposed Action would increase demand for energy across the city, overall demand would be expected to be able to be accommodated by existing energy generation.

Prototypical Site Assessment

Based on energy use rates provided in the *CEQR Technical Manual*, the Prototypical Sites would result in incremental energy demand ranging between a net reduction of 44,249,856 million British thermal units (MBtu) at Prototypical Site 7-1 and a net increase of 78,710,475 MBtu at Prototypical Site 6-1. Compared to the overall demand within Con Edison's service area which encompasses all of New York City, except a part of Queens, and most of Westchester County, these increases would be negligible. Therefore, significant adverse impacts on energy are not anticipated as a result of the Proposed Action as illustrated by the Prototypical Sites.

Representative Neighborhood Analysis

Based on energy demand rates provided in the *CEQR Technical Manual*, the Representative Neighborhoods would result in incremental increases in energy demand ranging between 12,708,010 MBtu at Representative Neighborhood 15 and 227,725,800 MBtu at Representative Neighborhood 2. Compared to the overall demand within Con Edison's service area which encompasses all of New York City, except a part of Queens, and most of Westchester County, these increases would be negligible. Therefore, significant adverse impacts on energy are not anticipated as a result of the Proposed Action as illustrated by the Representative Neighborhoods.

Transportation

The Proposed Action could result in significant adverse transportation impacts including traffic, transit, and pedestrian impacts. Overall, the Proposed Action would increase demand on traffic bus, subway, and pedestrian elements across the City, and while the incremental demand caused by the Proposed Action would likely be able to be accommodated by existing transportation services and infrastructure, as illustrated by the Prototypical Sites and Representative Neighborhoods, the potential for significant adverse traffic impacts cannot be ruled out. Significant adverse transportation impacts to traffic, transit and pedestrian elements could occur, and would require consideration of mitigation, as discussed in **Mitigation**.

Prototypical Site Assessment

The ~~27~~28 Prototypical Sites were assessed to evaluate whether the development increment would exceed the *CEQR Technical Manual* Table 16-1 thresholds, indicating the potential for significant

impacts. ~~Two~~Three of the ~~27~~28 sites—Prototypical Site 6-1, Prototypical Site 6-2, and Prototypical Site ~~6-2~~8—exceeded the threshold and warranted further assessment.

In terms of vehicular traffic, Prototypical Site 6-1 would exceed the Level 1 (trip generation) screening threshold during all peak hours. A Level 2 traffic assignment screening assessment cannot be performed because the Proposed Action is a city-wide action and the specific location where any Prototypical Site may be developed is not known. Therefore, the potential for significant adverse traffic impacts associated with Prototypical Site 6-1 cannot be ruled out and this Prototypical Site would have the potential to result in significant adverse traffic impacts. Prototypical Site 6-2 and Prototypical Site 8 would not exceed the Level 1 (trip generation) threshold during any peak hour and therefore no potential for significant adverse impacts related to vehicular traffic are anticipated at Prototypical Site 6-2 and Prototypical Site 8.

In terms of bus, subway, and pedestrian, ~~both~~ Prototypical Site 6-1 ~~and~~, Prototypical Site 6-2, and Prototypical Site 8 would be below the *CEQR Technical Manual* Level 1 screening thresholds for these travel modes. Therefore, further analyses would not be warranted for bus, subway, and pedestrian modes, and significant adverse impacts are not expected for these travel modes. Additional ferry trips are not expected for Prototypical Site 6-1 ~~or 6-2~~, Prototypical Site 6-2, or Prototypical Site 8.

Representative Neighborhood Assessment

Similar to the Prototypical Sites described above, the 18 Representative Neighborhoods were screened to determine whether the peak hour trips generated by future new developments within the Representative Neighborhood would remain below the minimum Level 1 screening thresholds. If future development within a Representative Neighborhood exceeds these thresholds for a specific travel mode, then the potential for significant adverse transportation impacts cannot be ruled out. The screening assessment conducted for traffic, bus, subway, and pedestrians determined that:

- *Traffic*: Representative Neighborhoods 1 - 7, 10, 11, 13, and 18 would exceed the screening thresholds for vehicle trips for the high-end estimate. For the low-end estimate, Representative Neighborhoods 1 - 3, 6, 7, 10, 11, 13, and 18 would exceed the screening thresholds for vehicle trips. Therefore, the potential for significant traffic impacts cannot be ruled out.
- *Bus:* Representative Neighborhood 10 would exceed the screening thresholds for the high-end estimate for bus trips, therefore the potential for significant bus impacts cannot be ruled out. None of the 18 Representative Neighborhoods would exceed the screening thresholds for the low-end estimate.
- *Subway:* Representative Neighborhoods 2, 6, 8, 10, 13, and 18 would exceed the screening thresholds for subway trips for the high-end estimate. Representative Neighborhood 13 would exceed the screening thresholds for subway trips for the low-end estimate. Therefore, the potential for significant subway impacts cannot be ruled out.
- *Pedestrians:* Representative Neighborhoods 2 - 4, 6 - 11, 13, and 18 would exceed the screening thresholds for pedestrian trips for the high-end. Representative Neighborhoods 2, 6, 8, 10, and 13 would exceed the screening thresholds for pedestrian trips for the low-end estimate. Therefore, the potential for significant pedestrian impacts cannot be ruled out.

Air Quality

The Proposed Action would not result in significant adverse air quality impacts. The air quality analysis addressed mobile sources, parking facilities, and emissions from the HVAC and hot-water systems. Based on the assessments detailed in **Chapter 16, Air Quality**, as illustrated by both the Prototypical Sites and Representative Neighborhoods, the Proposed Action is not anticipated to result in significant adverse air quality impacts related to project generated vehicle trips, parking facilities, and emissions from HVAC and hot-water systems.

Mobile Sources

Vehicle trips generated by the Proposed Action at most of the ~~27~~28 Prototypical Sites are expected to be lower than the *CEQR Technical Manual* mobile source screening thresholds for detailed air quality impact analysis, for CO and $PM_{2.5}$, and no detailed mobile source impact analysis is required for these Prototypical Sites. Trip assignments developed for Prototypical Site 6-1 indicated that peak hour increments at intersections of local roads are no more than 29 trips; peak hour increments at intersections of minor arterial roads are no more than 84 trips. These trip increments do not exceed the CO or $PM_{2.5}$ screening thresholds provided in the *CEQR Technical Manual*. Therefore, a detailed air quality analysis of CO or $PM_{2.5}$ emissions for Prototypical Site 6-1 is also not required. As such, no significant adverse mobile source air quality impacts at intersections are anticipated at any of the Prototypical Sites as a result of the Proposed Action.

Similarly, significant adverse mobile source air quality impacts are also not anticipated at any of the Representative Neighborhoods as a result of the Proposed Action. While total volumes of vehicular trips generated in certain Representative Neighborhoods may rise above the CEQR thresholds for further assessment, these trips are distributed to many roadways and are not expected to exceed either of the CEQR mobile source thresholds, for CO or $PM_{2.5}$, at any single intersection. As such, and as illustrated by the Prototypical Sites, no mobile source emission impacts are anticipated at any of the 18 Representative Neighborhoods, and citywide, and the Proposed Action is not expected to adversely impact air quality levels due to vehicle trip increments.

Parking Facilities

Twenty-six of the ~~27~~28 Prototypical Sites would result in a reduction in parking capacities. While Prototypical Site 6-1 in the Oakland Gardens neighborhood of Queens would increase parking capacity by 74 spaces, this increment falls below the threshold that would warrant further analysis of parking facilities as is accepted by City agencies. Therefore, no significant adverse air quality impacts due to parking facilities is anticipated.

The Proposed Action is expected to relax and reduce parking requirements, citywide, which include the exemption of parking spaces for certain one- and two-family homes and the creation of consistent floor area exemptions for parking in low-density districts, as well as building upon existing geographies established in the Zoning Resolution to extend a comprehensive set of geographies that would serve as the basis for discretionary actions to remove parking requirements for existing housing. Therefore, as is illustrated by the Prototypical Sites, it is likely that at the neighborhood and citywide level, parking capacities would decrease as a result of the Proposed Action. As such, the Proposed Action is not anticipated to adversely impact air quality levels due to parking facilities.

Stationary Sources

The air quality impacts from HVAC and hot-water systems from the ~~27~~28 Prototypical Sites were first screened using nomographs provided in the *CEQR Technical Manual*. Of the ~~27~~28 Prototypical Sites, 12 were below the 10,000 gross square feet threshold considered for the nomograph screening. Of the remaining ~~15~~16 Prototypical Sites, 11 passed the screening and ~~4~~5 required further assessment using AERMOD modeling techniques. The results of the detailed modeling demonstrated compliance with the National Ambient Air Quality Standards (NAAQS) and CEQR *de minimis* thresholds. As such, no significant adverse air quality impacts are expected from the HVAC or hot-water systems at the Prototypical Sites.

Greenhouse Gas Emissions and Climate Change

The Proposed Action would not result in significant adverse impacts to greenhouse gas emissions (GHG) and climate change. The Proposed Action would be consistent with the applicable City GHG emissions reduction goals and would not change or be in conflict with any of the existing city, state, and federal protections related to flood resiliency and climate change, and therefore no significant adverse impacts related to GHG emissions or climate change are anticipated as a result of the Proposed Action.

Prototypical Site Assessment

Greenhouse Gas Emissions

Only one of the prototypical sites (Site 6-1) consists of development 350,000 square feet or greater. Therefore, pursuant to CEQR guidance, only Prototypical Site 6-1 would warrant a greenhouse gas emissions analysis. However, as greenhouse gas emissions analyses require information on building design, fuel use, and sustainability measures which are not available due to the non-site-specific nature of the prototypical analysis sites, it is not feasible to conduct a quantitative analysis for Prototypical Site 6-1. However, based on a general assessment of the GHG reduction measures applicable to all sites, it was determined that overall, the Proposed Action is consistent with the goal of reducing Citywide GHG emissions by 40 percent by 2030 and 80 percent by 2050 compared to 2005 levels, and therefore, no significant impacts related to GHG emissions are anticipated.

Resilience to Climate Change

The Proposed Action is not anticipated to result in significant adverse impacts to climate change resiliency. While the Proposed Action would result in changes to the height, bulk, and parking regulations of residential zoning districts and their commercial equivalents, these changes would not hinder the ability of developments, like those illustrated by the Prototypical Sites, to incorporate future adaptive strategies to mitigate future flood risks, as appropriate to their location. Strategies are discussed below in the Representative Neighborhood section, and as the purpose of the strategies is to protect public health, safety and welfare, and to reduce losses from flood conditions in flood hazard areas, significant adverse impacts due to climate change are not anticipated at the Prototypical Sites.

Representative Neighborhood Assessment

Greenhouse Gas Emissions

As illustrated in **Chapter 17, Greenhouse Gas Emissions and Climate Change**, given the mix of housing unit types, it is possible that a Representative Neighborhood would experience development of greater than 350,000 square feet across a variety of developments or even on a single development site (such as a development like Prototypical Site 6-1); however, these sites are not known. Therefore, a quantitative greenhouse gas emissions analysis cannot be provided, and instead, the Proposed Action is assessed qualitatively.

With the Proposed Action, it is anticipated that new construction would comply with Local Laws 97 (the "Climate Mobilization Act") and 154. Overall, GHG emissions from the Proposed Action would depend on how far New York State energy generation would advance towards reducing fossil fuel use and GHG.

In addition, the Proposed Action would be consistent with the goal of pursuing transit-oriented development. In medium- and high-density areas, the Proposed Action would allow buildings to add additional floor area (if the additional units are affordable); this would result in more housing units closer to transit. In low-density districts, the Proposed Action would increase housing opportunities by reintroducing modest 3- to 5-story apartment buildings in low-density commercial districts and on large sites near transit. For new units located near transit, it is expected that auto trips would be reduced and therefore, the Proposed Action would be consistent with the City's GHG reduction goals.

In addition, by removing off-street parking mandates, it is possible that the Proposed Action may indirectly discourage car ownership and lead to fewer auto trips.

Overall, the Proposed Action is consistent with the goal of reducing Citywide GHG emissions by 40 percent by 2030 and 80 percent by 2050 compared to 2005 levels.

Resilience to Climate Change

The Proposed Action is not anticipated to result in significant adverse impacts to climate change resiliency. While the Proposed Action would result in changes to the height, bulk, and parking regulations of residential zoning districts and their commercial equivalents, these changes would not hinder the ability of these developments to incorporate future adaptive strategies to mitigate future flood risks. Such strategies include Zoning for Flood Resiliency and flood resilient building codes that require new developments to comply with Appendix G of New York City's building code, which sets flood-resistant construction standards. Additionally, the Proposed Action would not allow ADUs in Special Coastal Risk Districts (SCRD). The purpose of these standards is to protect public health, safety and welfare, and to reduce losses from flood conditions in flood hazard areas. Therefore, significant adverse impacts due to climate change are not anticipated from the Proposed Action.

Noise

The Proposed Action could result in significant adverse noise impacts. A noise assessment was conducted to determine whether the Proposed Action would significantly increase sound levels from mobile and stationary sources at existing and future noise receptors in accordance with the *CEQR Technical Manual*. As illustrated in **Chapter 18, Noise**, the Proposed Action is not expected to result in significant adverse noise impacts on existing sensitive receptors. However, at new noise-sensitive

receptors facilitated by the Proposed Action, higher interior noise levels than the interior noise limit provided by the *CEQR Technical Manual* cannot be ruled out. Significant adverse noise impacts could occur, and would require consideration of mitigation, as discussed in **Mitigation**.

Prototypical Site Assessment

Mobile sources that would be generated by individual developments under the Proposed Action were assessed to evaluate the potential for mobile source noise impact on existing noise receptors. The assessment concluded that none of the ~~27~~28 Prototypical Sites has the potential to result in ambient noise increase of 3 to 5 dBA compared with the No-Action condition. Therefore, there would be no significant adverse noise impacts on existing noise sensitive receptors due to vehicle trips increase resulted from the Proposed Action.

All buildings' rooftop mechanical equipment, including air conditioner compressors, would have to be enclosed and would have to comply with New York City Noise Code requirements, which would limit noise levels generated by such equipment to 65 dBA during the daytime (7 AM to 10 PM) and 55 dBA during the nighttime (10 PM to 7 AM). Therefore, the Proposed Action would not result in significant adverse stationary source noise impact.

Noise levels in any given location are influenced by a range of factors, including whether a location is near lightly or highly trafficked roadways, near rail lines or other rail infrastructure, within the path of aircraft, or near other outdoor stationary sources of noise, such as busy playgrounds or power generation systems. These conditions vary widely and result in diverse ambient noise levels throughout the city. Since it cannot be determined whether any of the future development sites under the Proposed Action would be located near highly trafficked roadways, rail lines, within aircraft paths, or near other stationary sources of noise, the potential for some developments to have elevated interior noise levels that could potentially exceed interior noise level guidelines provided by the *CEQR Technical Manual* (in the absence of building attenuation measures) cannot be ruled out.

Representative Neighborhood Assessment

Significant mobile source noise impacts by increased vehicle trips as result of the Proposed Action are not anticipated at any of the Representative Neighborhoods. According to criteria provided by the *CEQR Technical Manual*, noise increase of 3 to 5 dBA at existing noise sensitive receptors is considered significant. When traffic is the dominant noise source, a 3 dBA noise increment is considered equal to the doubling of the traffic noise PCEs, indicating an increase in traffic by approximately 100 percent; a 5 dBA noise increment is considered equal to the tripling of traffic noise PCEs, indicating an increase in traffic by approximately 200 percent. The transportation analysis for the Representative Neighborhood Assessment showed that the highest hourly vehicular trip increase generated in certain Representative Neighborhoods may rise to about 800 vehicle trips per hour. However, these trips would be distributed to many roadways in areas that extend to hundreds of city blocks. Therefore, it is not expected that traffic volumes along any streets within the Representative Neighborhoods under With-Action conditions would exceed CEQR impact criteria indicating a significant adverse mobile source noise impact (i.e., a doubling or tripling of noise PCEs),. As such, no mobile source noise impacts on existing noise sensitive receptors are anticipated at any of the 18 Representative Neighborhoods or citywide.

Public Health

The Proposed Action would not result in significant adverse public health impacts. As described in the accompanying chapters of the EIS, the Proposed Action would not result in unmitigated significant adverse impacts related to air quality or water quality. However, based on the **Hazardous Materials** and **Noise** assessments, the potential for the Proposed Action to result in significant adverse impacts related to hazardous materials (due to increases in-ground disturbances) and noise (due to the potential for development sites to be located near highly trafficked roadways, rail lines, within aircraft paths, or near other stationary sources of noise), respectively, could not be ruled out. Therefore, a preliminary assessment of public health was conducted, and is provided in **Public Health**. As detailed therein, the Proposed Action could result in significant adverse unmitigated impacts related to hazardous materials and noise. However, the potential for these impacts to occur is expected to be limited and would not significantly affect public health. The Proposed Action is expected to result in a little more housing everywhere, resulting in new housing development that is up to current Building Code and could result in higher quality housing alleviating public health concerns. Therefore, no significant adverse public health impacts are expected as a result of the Proposed Action.

Additionally, the DCP is exploring additional zoning regulations and non-zoning strategies to address public health concerns related to specific aspects of the proposal.

Neighborhood Character

The Proposed Action would not result in significant adverse impacts to neighborhood character. As detailed in **Chapter 20, Neighborhood Character**, land use, zoning, public policy, socioeconomic, community facilities, open space, shadows, historic and cultural resources, urban design, visual resources, transportation, and noise conditions in the future with the Proposed Action would not negatively affect the neighborhood character of low-, medium-, and high-density neighborhoods within the city.

Although significant adverse impacts cannot be ruled out with respect to community facilities, historic and cultural resources, urban design and visual resources, shadows, open space, transportation, and noise, these impacts would largely be confined to a small portion of development that would be facilitated by the Proposed Action. As such, they would not result in a significant change to any determining elements of neighborhood character. Additionally, potential adverse impacts on visual resources would also not result in a significant change to any determining elements of neighborhood character. Furthermore, by facilitating flexible building envelopes, the Proposed Action would likely improve the pedestrian experience and therefore the neighborhood character of the city's residential zoning districts. Based on the foregoing, no significant adverse neighborhood character impacts would occur as a result of the Proposed Action.

Construction

The Proposed Action could result in significant adverse construction impacts related to transportation, noise, historic and cultural resources, hazardous materials, and natural resources. While the Proposed Action is not expected to result in significant adverse air quality, open space, socioeconomic conditions, community facilities and services, land use, zoning, and public policy, neighborhood character, or water and sewer infrastructure impacts related to construction activities, the potential for significant adverse construction transportation and construction noise impacts, as

well as construction-related impacts to historic and cultural resources, hazardous materials, and natural resources, could not be ruled out. Although it is expected that the existing laws, regulations, and building codes that focus on reducing construction effects would reduce the potential for adverse effects, as illustrated by the Prototypical Sites and Representative Neighborhoods, the potential for significant adverse transportation, noise, historic and cultural resources, hazardous materials, and natural resources impacts due to the construction of individual Prototypical Sites where construction would be longer than 24 months, or within neighborhoods where construction of multiple sites could occur in clusters or along timeframes such that different sites would contribute to construction activities greater than two years, cannot be ruled out. Therefore, significant adverse construction impacts to transportation noise, historic and cultural resources, hazardous materials, and natural resources could occur, and would require consideration of mitigation, as discussed in **Mitigation**.

Prototypical Site Assessment

As illustrated by the Prototypical Site Assessment, many of the potential typologies resulting from the Proposed Action—with the exception of Prototypical Sites 1-5, 6-1, 6-2, and ~~6-2~~8—would be realized in construction periods of less than two years, which, per the *CEQR Technical Manual*, is considered "short term" and less likely to result in adverse impacts.

In general, the potential for construction-period impacts depends on many factors, including the overall duration of construction, the type and intensity of construction, and the relationship between construction activities and nearby sensitive receptors (e.g., residences, schools, hospitals, and historic or cultural resources). In addition, whether there is a need to close, narrow, or impede transportation infrastructure within areas of high pedestrian activity or near sensitive land uses can factor into whether a development may have impacts during construction, as does the type of construction equipment and the nature and extent of any commitment to use Best Available Technology (BAT) and noise control measures for construction equipment. Because these considerations are not known, the potential for significant adverse impacts from the Prototypical Sites where construction would be longer than 24 months cannot be ruled out.

Transportation

For Prototypical Sites 1-5, 6-1, 6-2, and ~~6-2~~8, since the construction period would likely be longer than two years, construction worker and truck deliveries to these sites were considered, based on construction worker and delivery projections for comparable residential developments and other factors. For Prototypical Sites 1-5, 6-1, 6-2, and ~~6-2~~8, With-Action condition construction activities would be expected generate above the 50-PCE (passenger car equivalent)[5] trip thresholds; therefore, the potential for these sites to result in significant adverse traffic impacts during construction cannot not be ruled out. Further, Prototypical Sites 6-1, 6-2, and ~~6-2~~8 are residential campuses and multiple buildings could potentially be developed; if all buildings at each site were to be constructed at once it would increase the intensity of construction activities and increase the likelihood of traffic impacts but may also decrease the duration of construction. At all three Prototypical Sites, construction-related subway, bus, and walk trips would be below the *CEQR Technical Manual's* 200-trip analysis

[5] Since larger vehicles such as trucks typically make up a significant portion of construction traffic, a passenger car equivalent factor is applied to these vehicles to account for their size difference. Per the *CEQR Technical Manual*, it is assumed that one truck is equivalent to two passenger cars.

thresholds for these travel modes. Therefore, significant adverse impacts for these travel modes would not be expected.

Air Quality

Based on the location of nearby sensitive receptors relative to the sources of construction air pollutant emissions, the duration and intensity of construction activities, a comparison of emissions profiles of similar projects in New York City, and the use of emission control measures, construction at Prototypical Site 1-5 would not result in significant adverse construction air quality impacts. Further, as Prototypical Site 1-5 represents the worst-case condition in terms of construction activities, duration, and intensity among the ~~27~~28 Prototypical Sites, significant adverse air quality impacts are not anticipated at any other Prototypical Site due to construction. Additionally, the maximum number of construction-related vehicle trips is not expected to exceed the *CEQR Technical Manual* thresholds for conducting a mobile source analysis. Therefore, no significant adverse air quality impacts due to construction activities are anticipated, and no further analysis is required.

Noise

Based on the potential location of nearby sensitive receptors relative to mobile and stationary construction noise sources, the duration and intensity of construction activities, a comparison of noise emissions profiles of similar projects in New York City, the potential for the construction of Prototypical Analysis Site 1-5 to result in significant adverse construction noise impacts could not be ruled out. However, as noted above, city agencies have established regulations and requirements that can reduce such potential impacts. Construction under the Proposed Action would be required to follow the requirements of the New York City Noise Control Code (also known as Chapter 24 of the Administrative Code of the City of New York, or Local Law 113) for construction noise control measures. Additionally, while future development at this Prototypical Site – and similar Prototypical Sites containing large buildings and long construction durations – could employ a variety of source and/or path controls to reduce or eliminate any such impacts, as described above, the development resulting from the Proposed Action would be as-of-right, and thus there would be no mechanism for the City to require noise mitigation measures that go beyond those required under the Noise Code.

Representative Neighborhood Assessment

In terms of the Representative Neighborhoods, it is possible that construction in each of the Representative Neighborhoods or elsewhere in the city, would occur in clusters or along timeframes such that different sites would contribute to construction activities greater than two years; these clusters of activity could be located near sensitive receptors or could temporarily change the character of a neighborhood from one with minimal construction activity to one with multiple construction efforts underway simultaneously. Therefore, the potential for significant adverse construction impacts to transportation, noise, historic and cultural resources, hazardous materials, and natural resources cannot be ruled out even though it is expected that the existing laws, regulations, and building codes that focus on reducing construction effects would reduce the potential for adverse effects.

Alternatives

Two potential alternatives to the Proposed Action were considered: the No-Action Alternative and the No Unmitigated Significant Adverse Impacts Alternative. Neither alternative would meet the

primary objectives of the Proposed Action to address the city's housing shortage and its human consequences by facilitating new housing and a wider range of housing types in every neighborhood in New York City. In both alternatives, housing production would be limited and would continue to not keep pace with the rapid rate of population growth, job growth, and new household formation within the city, which will continue to raise prices and increase displacement, gentrification, segregation, and other ills. The lack of housing production and affordable housing production to meet the demand of the city under both alternatives will continue to put New Yorkers at greater risk of housing instability, making it more difficult for residents experiencing homelessness to regain stable housing, and for intergenerational families and other household types to find adequate and affordable housing that meet their unique needs. Additionally, under both alternatives, long-standing inequities in New York City's housing stock would continue to be exacerbated by the housing crisis, and New Yorkers of color (particularly Black and Hispanic residents) will continue to be disproportionately impacted by the housing and homelessness crisis. Therefore, the analysis concludes that no feasible alternatives are available that would result in no unmitigated impacts that meet the Proposed Action's goals.

Mitigation

The Proposed Action has the potential to result in significant adverse impacts related to community facilities (early childhood programs and public elementary schools), open space, shadows, historic resources (architectural and archaeological), urban design and visual resources, natural resources, hazardous materials, transportation (traffic, transit, and pedestrians), noise, and construction (traffic, architectural resources, hazardous materials, and noise). Due to the non-site-specific nature of the Proposed Action, there are no known or identified development sites, and therefore there is no mechanism for the City to require mitigation at individual development sites as future development under the Proposed Action would occur as-of-right. Therefore, there are no mitigation measures that can be implemented at individual development sites that would reduce or eliminate the potential for significant adverse impacts identified in the technical analysis areas described above. As such, any such impact would remain unmitigated.

However, for each identified impact, a description of general mitigation measures that could be employed to reduce or eliminate such impacts is detailed in **Chapter 22, Mitigation**.

Unavoidable Significant Adverse Impacts

As described in **Community Facilities and Services**, **Open Space**, **Shadows**, **Historic and Cultural Resources**, **Urban Design and Visual Resources**, **Natural Resources, Hazardous Materials**, **Transportation**, **Noise**, and **Construction**, the Proposed Action has the potential to result in significant adverse impacts with respect to public elementary schools, early childhood programs, open space, shadows, archaeological resources, architectural resources, visual resources, natural resources, hazardous materials, transportation (traffic, bus, subway, and pedestrians), noise, and construction (transportation and noise). However, as described in **Mitigation**, no practicable mitigation measures were identified that would reduce or eliminate these impacts. Due to the non-site specific nature of the Proposed Action it is not possible to identify specific mitigation measures for each of the impacts. Further, as development resulting from the Proposed Action would be as-of-right, there would be no mechanism for the City to conduct or require mitigation measures for each of the identified impacts. As such, the Proposed Action would result in the potential for unavoidable adverse impacts with respect to public elementary schools, early childhood programs, open space,

shadows, archaeological resources, architectural resources, visual resources, natural resources, hazardous materials, transportation (traffic, bus, subway, and pedestrians), noise, and construction (transportation and noise).

Growth-Inducing Aspects of the Proposed Project

It is expected that the Proposed Action would result in new housing being built throughout the city in a range of housing typologies that will meet the needs of current and future New Yorkers. The Proposed Action would increase housing options throughout all neighborhoods of New York City, from the lowest-density areas to the highest, providing opportunities to address ongoing housing constraints. Citywide, it is expected that compared to the No-Action condition, the Proposed Action would introduce up to approximately 58,000 to 109,000 new units by the 2039 analysis year, averaging an additional 3,900 to 7,300 new units per year. Of the new units, approximately 9,200 to 22,000 units are expected to be designated as affordable, and approximately 27,000 to 40,000 units would consist of ADUs.

Compared with average production since 2010, the annual rate of housing production is expected to increase, averaging approximately 24,200 to 30,600 new units per year under the Proposed Action, which represents an increase of approximately 2,950 to 9,350 new units compared to the average annual rate of production since 2010.

The environmental consequences of this growth are the subject of the technical analyses of this EIS. The projected increase in residential population could increase the demand for neighborhood services, ranging from community facilities to local goods and services. This could enhance the growth of local existing commercial corridors. The Proposed Action could also lead to additional growth in the City and State economies, primarily due to employment and fiscal effects due to construction and operation of buildings. However, this secondary growth would be expected to occur incrementally Citywide and is not expected to result in any significant impacts in any particular area or at any particular site. It is not anticipated that the Proposed Action would generate significant secondary impacts resulting in substantial new development in nearby areas. The Proposed Action would not introduce a new economic activity that would alter existing economic patterns. Therefore, the Proposed Action would not induce significant new growth in the surrounding area.

Irreversible and Irretrievable Commitments of Resources

Development of these the new units anticipated as a result of the Proposed Action would constitute a long-term commitment of land resources, thereby rendering land for other purposes highly unlikely in the foreseeable future. However, the land use changes that would occur as a result of the Proposed Action would, in most cases, as illustrated by the Prototypical Sites, consist of development on sites where as-of-right development would have occurred in the No Action condition.

Further, the commitments of resources and materials are weighed against the benefits of the Proposed Action. The Proposed Action is intended to address the continued housing shortage by increasing the supply of housing of various typologies in all neighborhoods across the City. The Proposed Action seeks to address high housing costs, relieve displacement and gentrification pressure, address historic segregation, and contribute to reducing homelessness, tenant harassment, and low housing quality. Overall, the Proposed Action is intended to update zoning to eliminate outdated or overly restrictive zoning regulations that have stifled housing production in recent decades even as the housing crisis and its consequences have worsened.

Conceptual Analysis

The Proposed Action would introduce new discretionary actions, modify existing discretionary actions and introduce new zoning districts that would not be applicable until mapped through zoning map amendments. The Proposed Action's potential for significant adverse impacts to any CEQR technical area related to the proposed authorizations, special permits, and/or new zoning districts would be evaluated at the time an application for a specific site-specific proposal are sought. As detailed in **Chapter 26, Conceptual Analysisi**, development generated by the Proposed Action's new authorizations, special permits, and zoning districts would be considered discretionary actions and subject to CPC approval. Because the potential for significant adverse impacts is dependent on site-specific conditions, it is difficult, in the absence of specific applications, to predict the full scope of potential impacts. It is not possible to predict whether discretionary actions would be pursued on any one site in the future, and each action would require its own discretionary approvals and public review process. When a discretionary action is applied for, it would be subject to its own environmental review, with a project-specific analysis, beyond what is analyzed in this chapter on a conceptual and non-site specific basis.

As such, detailed and site-specific analyses of the potential effects of the anticipated With-Action projects pursuant to City and State environmental regulations would be made at the time an application is submitted in order to determine whether significant adverse impacts would result from a specific proposed action on a future project. Although it is impossible to predict the precise impacts that would be realized by the utilization of the proposed discretionary actions, a conceptual analysis was conducted for the purpose of understanding the probable range of impacts that may result if and when these actions are sought in the future. If the environmental reviews were to find the potential for significant adverse impacts, the CPC would have the authority to prescribe the necessary mitigation to offset and/or minimize those adverse effects.

Summary of Potential Impacts

Table ES-5 summarizes the Prototypical Sites and Representative Neighborhoods where potential impacts were identified or impacts could not be precluded due to their likelihood depending on site specific characteristics.

Table ES-5 Summary of Potential Impacts

Technical Area	Prototypes with Potential Impacts	Representative Neighborhoods with Potential Impacts (ID)																	
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Land Use, Zoning, and Public Policy																			
Socioeconomic Conditions																			
Business Displacement																			
Residential Displacement																			
Community Facilities																			
Elementary Schools		X										X							
Intermediate Schools																			
High Schools																			
Early Childhood Programs							X												
Libraries																			
Fire, Police, Healthcare																			
Open Space																			
Direct																			
Indirect	6-1			X							X	X					X		
Shadows	3-2B; 6-2, 8[6]																		
Historic Resources																			
Urban Design and Visual Resources																			
Urban Design																			
Visual Resources																			
Natural Resources																			
Hazardous Materials																			
Water and Sewer Infrastructure																			
Solid Waste and Sanitation Services																			
Energy																			

[6] Since this shadows analysis for Prototypical Site 6-2 was replaced with a more conservative assessment of Prototypical Site 8 in the FEIS, there is the potential for both of these illustrative prototypical sites to result in a shadows impact.

Table ES-5 Summary of Potential Impacts

Technical Area	Prototypes with Potential Impacts	Representative Neighborhoods with Potential Impacts (ID)																	
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Transportation																			
Traffic	6-1	X	X	X	X	X	X	X			X	X		X					X
Bus											X								
Subway				X			X		X		X			X					X
Pedestrians			X	X	X		X	X	X	X	X	X		X					X
Air Quality																			
Greenhouse Gas Emissions and Climate Change																			
Noise																			
Public Health																			
Neighborhood Character																			
Construction																			
Transportation																			
Air Quality																			
Noise																			
Historic																			
Hazmat																			

Notes:
Dark green shading in the above table indicates where potential impacts are identified for Prototypes or Representative Neighborhoods.
Light green shading indicates where impacts could not be precluded because their likelihood depends on site specific characteristics
Where impacts were identified for specific Prototypical Sites or Representative Neighborhoods in the EIS, they are indicated with an 'X'