1

Project Description

This chapter provides descriptive information about the requested discretionary land use action and the development project that could be facilitated by the requested actions. The purpose of this section is to convey project information relevant to environmental review.

1.1 Introduction

The applicants, GO Broome LLC and The Chinatown Planning Council Housing Development Fund Company, Inc. (CPC), are seeking the following discretionary actions from the City Planning Commission:

- A zoning map amendment to change an R8 district to an R9-1 district with a C2-5 overlay;
- A zoning text amendment to Appendix F of the Zoning Resolution (Inclusionary Housing Designated Areas and Mandatory Inclusionary Housing Areas) to designate a Mandatory Inclusionary Housing Area, and to ZR Sections 23-011 (Quality Housing Program), 28-01 (Applicability of this Chapter), and 78-03 (Applicability of this Chapter) to allow the use of the Quality Housing Program;
- An authorization pursuant to ZR Section 13-443 (Reduction in the number of required existing parking spaces) to eliminate 33 spaces of required accessory off-street parking on Block 346, Lot 75;

› A modification of the Seward Park Extension West Large-Scale Residential Development (the "LSRD") to reflect changes to the zoning lots and to update the site plan and zoning calculations of the LSRD, which includes the addition of Block 346, Lot 37 and an authorization and special permits pursuant to ZR Section 78-311 (Authorizations by the City Planning Commission) and 78-312 (Special permits by the City Planning Commission).

Together, the proposed actions would facilitate the development of two buildings to be located on Block 346, Lots 37 and 75 ("Projected Development Site 1"). The proposed development would include a 30-story, 310-foot-tall mixed-use building with frontage on Suffolk and Broome Streets called the "Suffolk Building," and a 16-story, 165-foot-tall building with frontage on Norfolk and Broome Streets called the "Norfolk Building." Independent of the proposed development, in the future with the proposed actions, it is anticipated that the owner of the existing 5-story mixed-use building located on Lot 95 of the project block ("Projected Development Site 2") would increase its commercial space by approximately 4,759 gsf.

Overall, the With Action condition would total approximately 466,901 gsf, with approximately 399,344 gsf for residential space, 23,547 gsf for commercial space (including 4,759 gsf of commercial space on Block 346, Lot 95), and 44,010 gsf for community facility space. There would be a total of approximately 488 dwelling units, with approximately 208 units designated as permanent affordable units in the proposed development on Projected Development Site 1; the 208 units would be composed of approximately 93 Mandatory Inclusionary Housing (MIH) and 115 Affordable Independent Residences for Senior (AIRS) residences.[1] The proposed project would amend the site plan for the LSRD. In addition, there would be a Restrictive Declaration for the project that would provide for the implementation of Project Components Related to the Environmental (PCREs) and those mitigation measures necessary to mitigate any significant adverse impacts.

This application is in the same large-scale residential development as another separate application. As an independent application, the New York City Department of Housing Preservation and Development (HPD) seeks approval of a corrective action that would remove the overlapping portion (Block 346) of the Seward Park Extension Large-Scale Residential Development and the Essex Crossing Large-Scale General Development by subdividing the Seward Park Extension Large-Scale Residential Development into two non-contiguous large-scale residential developments in the Lower East Side, Manhattan Community Board 3. The subdivided LSRDs would encompass the following:

› Seward Park Extension West Large Scale Residential Development (which is the LSRD that is the subject of the Proposed Actions in this application), consisting of Block 351, Lot 1 and Block 346, Lots 1, 75, and 95; and

› Seward Park Extension East Large-Scale Residential Development, consisting of Block 341, Lots 1, 58, and 70; Block 347, Lot 80; Block 336, Lots 1, 5, 35, and a portion of 28.

[1] The current plan is to provide approximately 93 MIH units in the Suffolk Building and approximately 115 AIRS units in the Norfolk Building. The AIRS units are subject to City financing. If financing is unavailable, the Norfolk Building would be developed pursuant to MIH and include a set-aside of non-AIRS permanently affordable housing units.

1.2 Project Area

The project area consists of the following parcels:

- Block 346, Lots 37 and 75, comprising Projected Development Site 1 (see **Figure 1-1**). The development site has approximately 201 feet of frontage on Broome Street, 125 feet of frontage on Norfolk Street and 196 feet of frontage on Suffolk Street and a total lot area of approximately 32,401 sf. Lot 37 has a lot area of approximately 7,443 square feet and is occupied by the remnants of the former Beth Hamedrash Hagodol (BHH) synagogue. Lot 75 has a lot area of approximately 24,958 square feet and is designated as accessory parking for the Hong Ning senior housing building (located on Block 346, Lot 1), but it has been underutilized by occupants since it was first provided in connection with the construction of the senior housing building in 1982.
- Block 346, Lot 95 (Projected Development Site 2) (see **Figure 1-1**). Lot 95 has a lot area of approximately 8,637 sf and is improved with a 5-story mixed use building, which contains 26 residential units and ground floor retail.
- Block 346, Lot 1. Lot 1 has a lot area of approximately 19,483 sf and is improved with the 14-story Hong Ning senior housing building, which is owned and operated by the Chinatown Planning Council Housing Development Fund Company, Inc., an affiliate of CPC. The building contains 156 units. No changes are proposed to this parcel as part of the land use actions other than the rezoning from R8 to R9-1 with a C2-5 overlay and certain waivers, which would ensure the continued compliance of the Hong Ning building (see Section 1.3, Proposed Actions, for more details).
- Block 351, Lot 1. This site is a full-block site with a lot area of approximately 47,056 sf. It is improved with a 23-story residential building at the north end of the block and a low-rise community facility building at the south end of the block with a substantial amount of open space, all owned by the New York City Housing Authority (NYCHA). No changes are proposed to this parcel as part of the land use action.

Table 1-1 provides a summary of the Projected Development Sites 1 and 2. **Photos 1** to **4** show existing conditions at the projected development sites.

Table 1-1 Existing Conditions (Projected Development Sites 1 and 2)

	Projected Development Site 1		Projected Development Site 2	
	Lot 37	Lot 75	Lot 95	Total
Commercial GSF	0	0	4,118	4,118
Community Facility GSF*	0	0	0	0
Residential GSF	0	0	18,248	18,248
Total GSF	0	0	22,366	22,366

*Projected Development Site 1 contains remnants of the BHH synagogue.

The Project Area (excluding Block 346, Lot 37) is part of the Seward Park Extension West LSRD, which currently consists of Block 346, Lots 1, 75, and 95 and Block 351, Lot 1. See below for a discussion of the LSRD history ("Project Area History") and for proposed modifications to the LSRD (1.3, "Proposed Actions").

Figure 1-1 Site Location

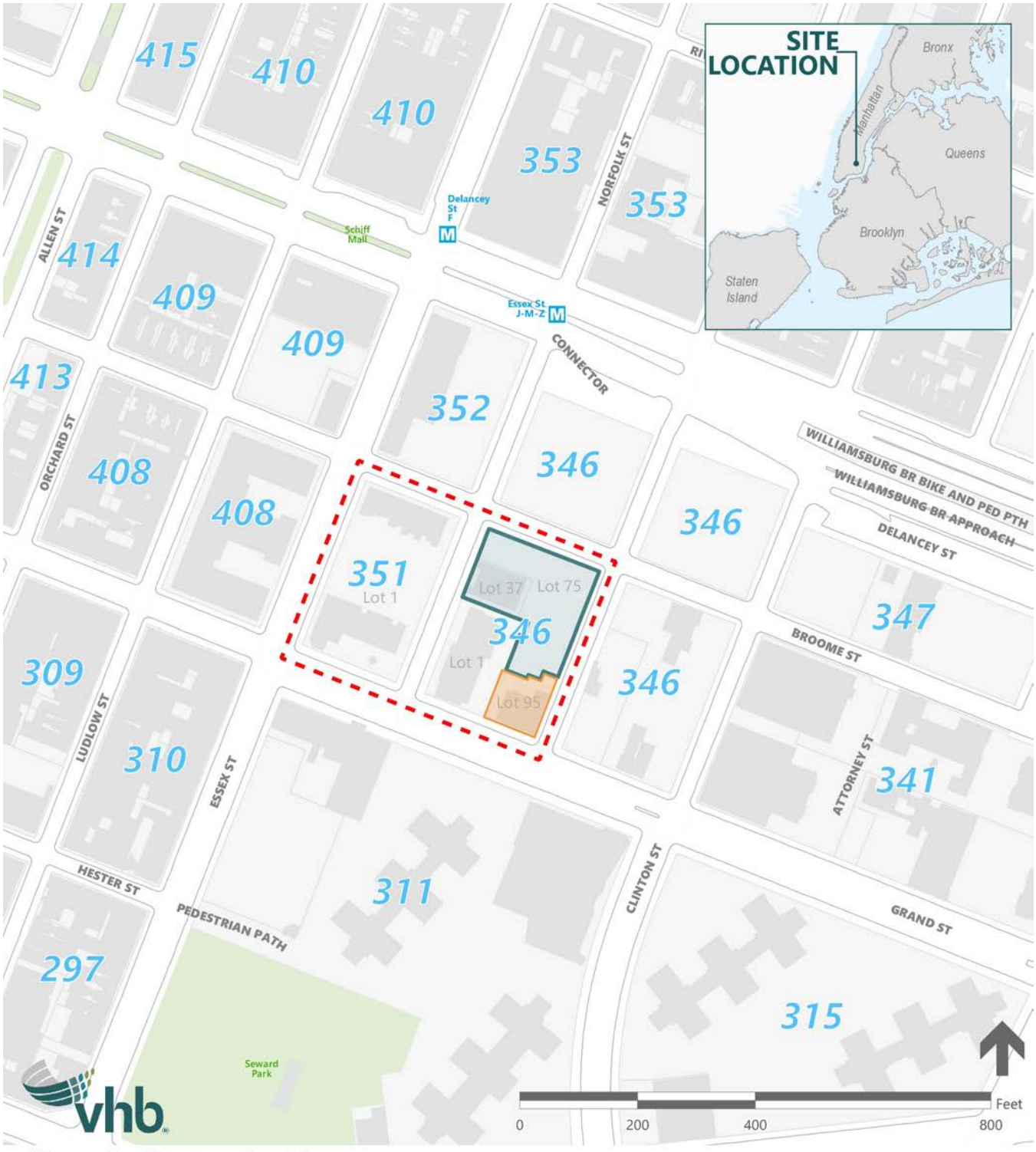


Figure 1 - Site Location Map

Projected Development Site 1 | Projected Development Site 2 | Project Area

Photo 1



View of Lot 95 from southeast corner of Grand Street and Suffolk Street

Photo 2



View of remnants of BHH synagogue (Lot 37) from Norfolk Street

Photo 3



View of Hong Ning senior housing building from the corner of Norfolk Street and Broome Street

Photo 4



View of Lot 75 from the middle of Suffolk Street

Project Area History

By the mid-19th century, the Lower East Side had become a densely populated neighborhood characterized by four- to six-story tenement buildings. In 1955, the Mayor's Committee on Slum Clearance designated the triangular area bounded by Essex Street, Grand Street, and East Broadway as the Seward Park Urban Renewal Area. The existing buildings were demolished and four tower-in-the-park style cooperative apartment buildings were constructed, along with a small amount of retail and community facility space.

The Seward Park Extension Urban Renewal Area ("SPEURA") was approved by the City Planning Commission on June 2, 1965 (CP-18915) and the Board of Estimate on July 22, 1965. The SPEURA plan covered 14 blocks between Delancey, Essex, Grand, and Willet Streets consisting primarily of low-rise tenement buildings with ground floor commercial uses. The plan called for the development of 1,800 dwelling units along with community facility and commercial uses.

The SPEURA plan proposed combining a number of the blocks that it covered into large sites, also known as superblocks. The property comprising what is now Block 346, Lots 1, 75, and 95 in the Project Area was included as a portion of a superblock to be created by the elimination of Suffolk Street between Broome and Grand Streets and designated as Parcel 2. Although this portion of Suffolk Street was demapped as part of the SPEURA plan, it was never decommissioned and continues to function as a regular City Street. Seven parcels, including the site of the former BHH synagogue on Block 346, Lot 37, were not acquired as part of the SPEURA plan.

An application by NYCHA to create the Seward Park Extension Large Scale Residential Development (the "Original LSRD") within the SPEURA was approved by the City Planning Commission on May 11, 1966 (CP-19323) and the Board of Estimate on May 20, 1966. Among other things, the Original LSRD facilitated the development of the 23-story NYCHA building on Block 351, Lot 1.

The former BHH synagogue was designated as an individual landmark by LPC on February 28, 1967 (LP-0637) and reviewed by the City Planning Commission on March 29, 1967 (CP-19758). It was severely damaged by a fire in May of 2017 and only its remnants exist today.

An application by the Housing and Development Administration to rezone the property bounded by Essex Street, Broome Street, the northerly prolongation of Norfolk Street, Delancey Street, Clinton Street, an Unnamed Street, Willet Street and Grand Street from R7-2, C1-5 and C6-1 districts to R8 and C6-2 districts to permit development in accordance with the SPEURA plan was approved by the City Planning Commission on March 13, 1968 (CP-20171) and the Board of Estimate on March 21, 1968.

In furtherance of the development of the NYCHA building on Block 351, Lot 1, an application by the Housing and Development Administration for (1) an authorization under ZR Section 78-311(e) (Authorization by Commission) for the location of the building without regard to the height and setback regulations; (2) a special permit under ZR Section 78-312(d) (Special permits by the City Planning Commission) for minor variations in the front height and setback regulations; and (3) an authorization for accessory off-street parking spaces for the

building to be located on what is now Block 347, Lot 80, was approved by the City Planning Commission on December 23, 1969 to the Board of Estimate's approval on January 8, 1970. Block 351, Lot 1 and Block 347, Lot 80 are owned by NYCHA under a single deed, which requires the owner of Lot 80 to provide parking for Lot 1 in perpetuity. The NYCHA building was completed in 1972.

A change to the City Map eliminating Broome Street between Norfolk and Clinton Streets, and Suffolk Street between Grand and Delancey Streets to create a superblock in connection with the development of the SPEURA plan, and widening Norfolk Street between Broome Street and Grand Street from 50 feet to 64 feet was approved by the City Planning Commission on November 13, 1969 (CP-20853 and CP-20854) and the Board of Estimate on February 9, 1970.

The first amendment to the SPEURA plan was approved by the City Planning Commission on February 25, 1980 (C 790719 HUM) and the Board of Estimate on April 24, 1980. The amendment, among other things, split Parcel 2 in the SPEURA Plan into "Parcel 2A" (consisting of what is now Block 346, Lots 1, 75 and 95) and "Parcel 2B" (consisting of what is now Block 346, Lots 39 and 1001-1005).

Applications by HPD to facilitate the development of the 14-story Hong Ning senior housing building on Block 346, Lot 1, including (1) the disposition of Parcel 2A to The Chinatown Planning Council Housing Development Fund Company, Inc., (2) an authorization under ZR Section 78-311(e) for the location of the building without regard to the height and setback regulations, and a special permit under ZR Section 78-312(d) (Special Permits by the City Planning Commission) for minor variations in the front height and setback regulations were approved by the City Planning Commission on March 12, 1980 (C 790720 HDM and N 790721 ZSM) and the Board of Estimate on April 24, 1980. The Hong Ning building was completed in 1982.

Block 346, Lot 95 is improved with a five-story building, which was constructed in the early 1920s and includes ground-floor commercial use (which were in existence prior to the enactment of the current Zoning Resolution and are thus legal non-conforming uses) and 26 residential apartments above, and approximately 22,366 square feet of floor area. The height of the building is approximately 55 feet. However, in the early 1980s, the New York City Planning Commission approved two related applications to exclude the property from the SPEURA plan and the Original LSRD (N 830306 ZAM and N 830269 HCM). These approvals were never effectuated and Block 346, Lot 95 remains a part of the LSRD today. The SPEURA plan expired on July 22, 2005, forty years after it was adopted.

The Seward Park Mixed-Use Development Project, a large-scale general development commonly known as Essex Crossing, was approved by the City Planning Commission on August 22, 2012 and the City Council on October 11, 2012.[2]

[2] C 120226 ZMM, N 120227 ZRM, C 120228 ZSM, C 120229 ZSM, N120230 ZAM, C 120231 ZSM, C 120233 ZSM, C 120234 ZSM, C 120235 ZSM, N 120236 HAM, C 120237 PQM, C 120245 PPM, and C 120156 MMM; CEQR No. 11DME012M

1.3 Proposed Actions

To facilitate the project, the Applicants seek approval of four actions: a zoning map amendment, a zoning text amendment, a zoning authorization, and a modification of the Seward Park Extension West LSRD. The proposed actions consist of:

Rezoning (R8 to R9-1 with a C2-5 Overlay)

The zoning map amendment would rezone Block 346, Lots 1, 37, 75 and 95 (the entire block) from an R8 District to R9-1 with a C2-5 commercial overlay. The R9-1 district would permit a residential FAR of 9.0 (with MIH) and a maximum building height of 285 feet. In all other respects, the district would follow the regulations of an R9 district. Compared to the existing R8 district, the rezoning would increase the permitted FAR as follows: residential would increase from 6.02 to 9.00; AIRS from 7.20 to 9.00; and community facility from 6.50 to 10.00. The maximum building height would increase from 120 feet in the R8 district for a Quality Housing building, to 285 feet. This action is being sought because the density and uses permitted under the R9-1/C2-5 zoning are needed to provide the amount of affordable housing, neighborhood retail, and community facility uses to be included in the proposed development.

Zoning Text Amendment

Mandatory Inclusionary Housing Area: Appendix F

The zoning text amendment to Appendix F (Inclusionary Housing Designated Areas and Mandatory Inclusionary Housing Areas) would designate Block 346, Lots 1, 37, 75, and 95 as a Mandatory Inclusionary Housing Area. This action is being sought because it is consistent with City policy in connection with the rezoning from R8 to R9-1, and would provide for 208 permanently affordable homes within the portion of the Project Area that is being rezoned.

Quality Housing Program: ZR Sections 23-011, 28-01, and 78-03

ZR Sections 23-011 (Quality Housing Program), 28-01 (Applicability of this Chapter), and 78-03 (Applicability of this Chapter) would be amended to allow the Quality Housing program to apply to the proposed development in the LSRD.

Authorization (ZR Section 13-443)

A Zoning Authorization pursuant to ZR Section 13-443 (Reduction in the number of required existing parking spaces) to eliminate the 33-space parking lot on Block 346, Lot 75 would allow the proposed development to be constructed on Lot 75.

Modification of the LSRD

The LSRD would be modified to update the site plan and zoning calculations of the LSRD, which would include the addition of Block 346, Lot 37 into the LSRD, an authorization in connection with the Hong Ning building to modify the height and setback regulations along

a street located wholly within the LSRD, and special permits pursuant to ZR Section 78-312 (Special permits by the City Planning Commission) to allow (1) with respect to the proposed development, distribution of floor area without regard to zoning lot lines, modifications of the regulations governing height and setback along streets located at the periphery of the LSRD, and modifications of minimum distance between buildings on the same zoning lot; and (2) with respect to the existing Hong Ning building, modifications of the regulations governing height and setback along a street located at the periphery of the LSRD.

Modification of Height and Setback: ZR Section 78-311(e) Authorization

The standard Quality Housing height and setback regulations under ZR 23-662 (Maximum height of buildings and setback regulations) permit, in an R9-1 district, a maximum base height of 105 feet along wide streets and narrow streets located within 100 feet of a wide street, and a maximum base height of 95 feet on narrow streets located beyond 100 feet of a wide street. Along wide streets and along narrow streets within 50 feet of a wide street, a street wall must extend along the entire street frontage of the zoning lot, and at least 70 percent of the aggregate width of street walls must be located within eight feet of the street line and extend to at least the minimum base height or the height of the building, whichever is less, per ZR 23-661 (Street wall location). Along narrow streets located beyond 50 feet of a wide street, at least 70 percent of the street wall must be located within 15 feet of the street line. Above the maximum base height, a setback with a depth of at least 10 feet is required from the street line of a wide street, and a setback with a depth of at least 15 feet is required from the street line of a narrow street per ZR 23-662(c). ZR 23-662(c) also provides that the depth of such required setback may be reduced by one foot for every foot that the street wall is located beyond the street line, but a setback of less than seven feet in depth is generally prohibited. The maximum permitted building height is 145 feet along wide streets or along narrow streets within 100 feet of a wide street, and 135 feet along narrow streets located beyond 100 feet of a wide street.

The Hong Ning building was constructed pursuant to height factor zoning regulations and received an authorization under ZR 78-311(e) to modify height and setback regulations along Norfolk Street (a street located wholly within the Original LSRD) and a special permit under ZR 78-312(d) to modify height and setback regulations along Grand Street (a street located at the periphery of Original LSRD). Now that the zoning lot will be subject to the Quality Housing regulations by virtue of the proposed development, these waivers are no longer applicable. Therefore, to avoid the Hong Ning building becoming a non-complying building with respect to the Quality Housing bulk regulations, new waivers are requested to replace the prior waivers and ensure the continued compliance of the Hong Ning building.

The Hong Ning building is located 15.03 feet from Norfolk Street at its closest point. It rises without setback to an overall building height of 125.75 feet. Therefore, a modification is requested pursuant to ZR Section 78-311(e) (Authorizations by the City Planning Commission) to waive the street wall location requirements of ZR 23-661 (Street wall location) along the entire Norfolk Street frontage, and the required setback for an area comprising 7 feet by 63.33 feet above the maximum base height of 95 feet along the portion of Norfolk Street located beyond 100 feet of Grand Street, and for an area comprising 7 feet

by 100 feet above the maximum base height of 105 feet along the portion of Norfolk Street located within 100 feet of Grand Street.

Distribution of floor area: ZR Section 78-312(a) Special Permit

The Applicants request that 15,000 square feet of floor area be distributed from Block 346, Lot 95 to Block 346, Lot 37 without regard for zoning lot lines pursuant to ZR Section 78-312(a) (Special Permits by the City Planning Commission). This would allow more housing units than would otherwise be possible and is assumed to add 27 units of affordable housing on Projected Development Site 1.

Modifications of Height and Setback: ZR Section 78-312(d) Special Permit

Suffolk Building

Quality Housing height and setback regulations permit a base height of up to 125 feet in an R9-1 district for MIH developments under ZR 23-664 (Modified height and setback regulations for certain Inclusionary Housing buildings or affordable independent residences for seniors). The maximum permitted building envelope for the Suffolk Building would limit the base height to 85 feet along Broome Street and along Suffolk Street within approximately 67 feet of Broome Street, in order to match the datum established along Broome Street by the adjacent Essex Crossing buildings. The maximum permitted building envelope would further reduce the base height to 48 feet along the remainder of Suffolk Street heading toward the low-rise 384 Grand building.

Above the base height, a setback of 15 feet is required from the street line of a narrow street under ZR 23-66 (Height and Setback Requirements for Quality Housing Buildings). The proposed development would set back 10 feet on Suffolk Street, which is a narrow street. Therefore, a modification is requested for an area comprising five feet by 181'-4" above the maximum base height of 125 feet.

The underlying permitted maximum building height in R9-1 Districts is 285 feet (28 stories). The Suffolk Building would rise to a height of 310 feet tall (340 feet with bulkhead). Therefore, a modification is requested for the maximum height.

Hong Ning Building

As explained above, the Hong Ning building was constructed pursuant to height factor zoning regulations and received an authorization under ZR 78-311(e) to modify height and setback regulations along Norfolk Street (a street located wholly within the Original LSRD) and a special permit under ZR 78-312(d) to modify height and setback regulations along Grand Street (a street located at the periphery of Original LSRD). Now that the zoning lot will be subject to the Quality Housing regulations by virtue of the proposed development, these waivers are no longer applicable. Therefore, to avoid the Hong Ning building becoming a non-complying building with respect to the Quality Housing bulk regulations, new waivers are requested to replace the prior waivers and ensure the continued compliance of the Hong Ning building.

The Hong Ning building is located along the street line of Grand Street, except for three "notches" of varying depth along its frontage. It rises without setback to an overall building height of 125.75 feet. Therefore, a modification is requested pursuant to ZR Section 78-312(d) (Special permits by the City Planning Commission) to waive (i) the street wall location requirements of ZR 23-661 (Street wall location) for the notches along the Grand Street frontage, (ii) the required setback above the maximum base height of 95 feet along the portion of Norfolk Street located beyond 100 feet of Grand Street, comprising three areas of 10 feet by 25.33 feet, 7 feet by 5 feet, 10 feet by 8.33 feet, and 7 feet by 12.07 feet, and (iii) the required setback above the maximum base height of 105 feet along the portion of Norfolk Street located within 100 feet of Grand Street, comprising an area of 7 feet by 100 feet.

Modification of minimum distance between buildings: ZR Section 78-312(f) Special Permit

Under ZR Section 23-711 (Standard minimum distances between buildings), the Suffolk Building must be located at least 60 feet (window to window condition) from the Hong Ning senior housing building on Block 346, Lot 1. The proposed distance is 46 feet 10 inches away. Therefore, a 13.17 feet by 47.25 feet area would need to be waived. In addition, the minimum distance between buildings regulation requires the Norfolk Building to be located at least 40 feet (wall to wall condition) from the northern side of the Hong Ning senior housing building on Block 346, Lot 1. The proposed distance is 11 feet, 9 inches away. Therefore, an approximately 27.92 feet by 39.33 feet area would need to be waived.

1.4 Proposed Development and With Action Condition

The proposed development on Projected Development Site 1 consists of mixed-income housing, including affordable housing, program and office space for the CPC, space for the BHH Jewish Heritage and Cultural Center, and retail uses. The proposed development would consist of two independent buildings. The Suffolk Building would be a 30-story, 310-foot-tall mixed-use building totaling approximately 375,431 gsf, including approximately 316,421 gsf of residential space, 40,222 gsf of community facility floor area that will be owned by CPC, and approximately 18,788 gsf of neighborhood retail space facing Broome Street. The Norfolk Building would be a 16-story, approximately 165-foot-tall building totaling approximately 86,711 gsf, including approximately 82,923 gsf of residential space and 3,788 gsf of community facility space. BHH will use the space to open a Jewish Heritage and Cultural Center which will provide a small library and facilities for graduates and post graduate students to study Jewish heritage and customs practiced by the members of the former synagogue (BHH may elect to convert this space to commercial use in the future). Part of the space will also be used as a synagogue for regular synagogue services. The total gsf of the proposed development is approximately 462,142 gsf (see **Figure 1-2** to **Figure 1-7**).

Figure 1-2 Site Plan

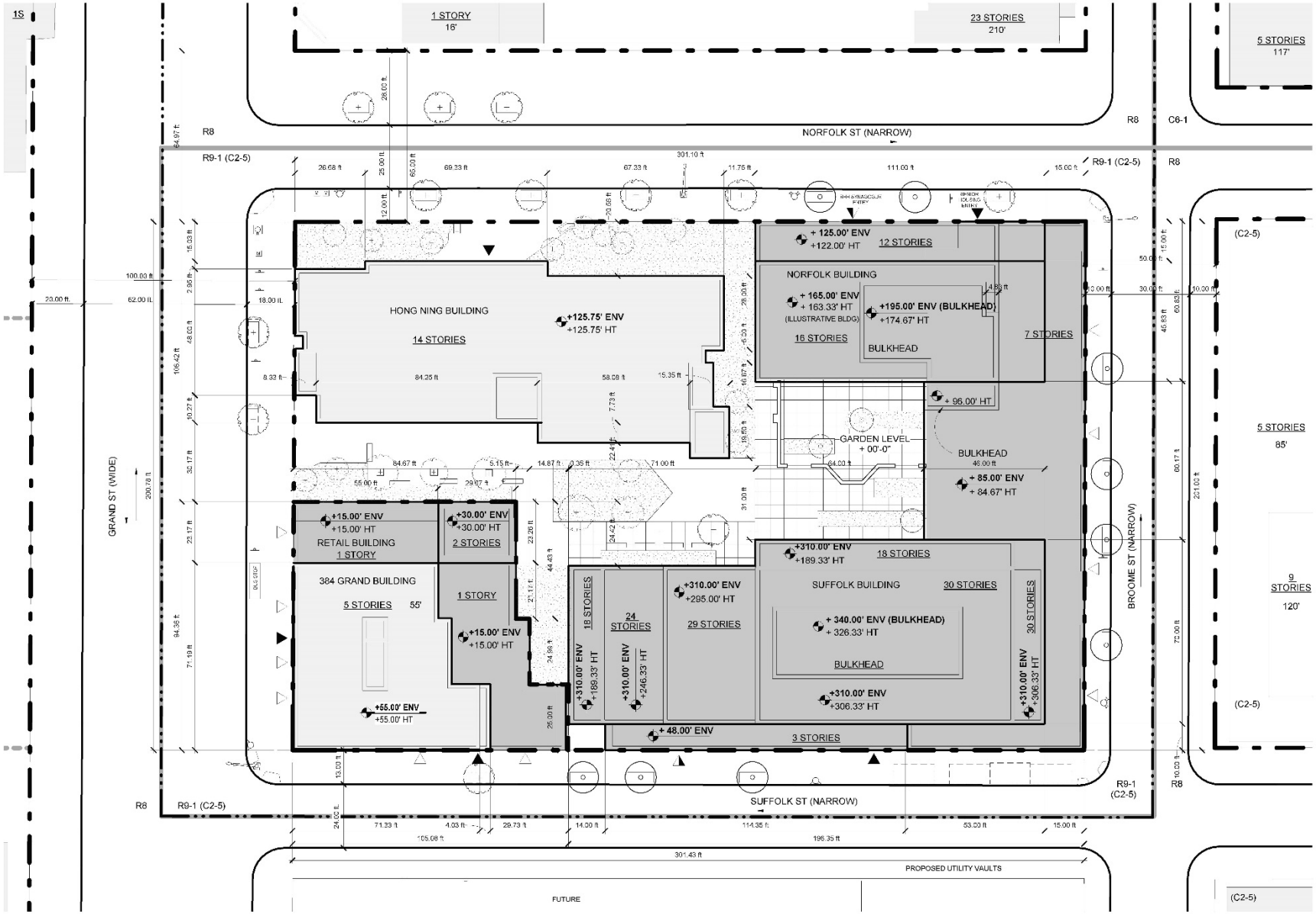


Figure 1-3 Waiver Plan

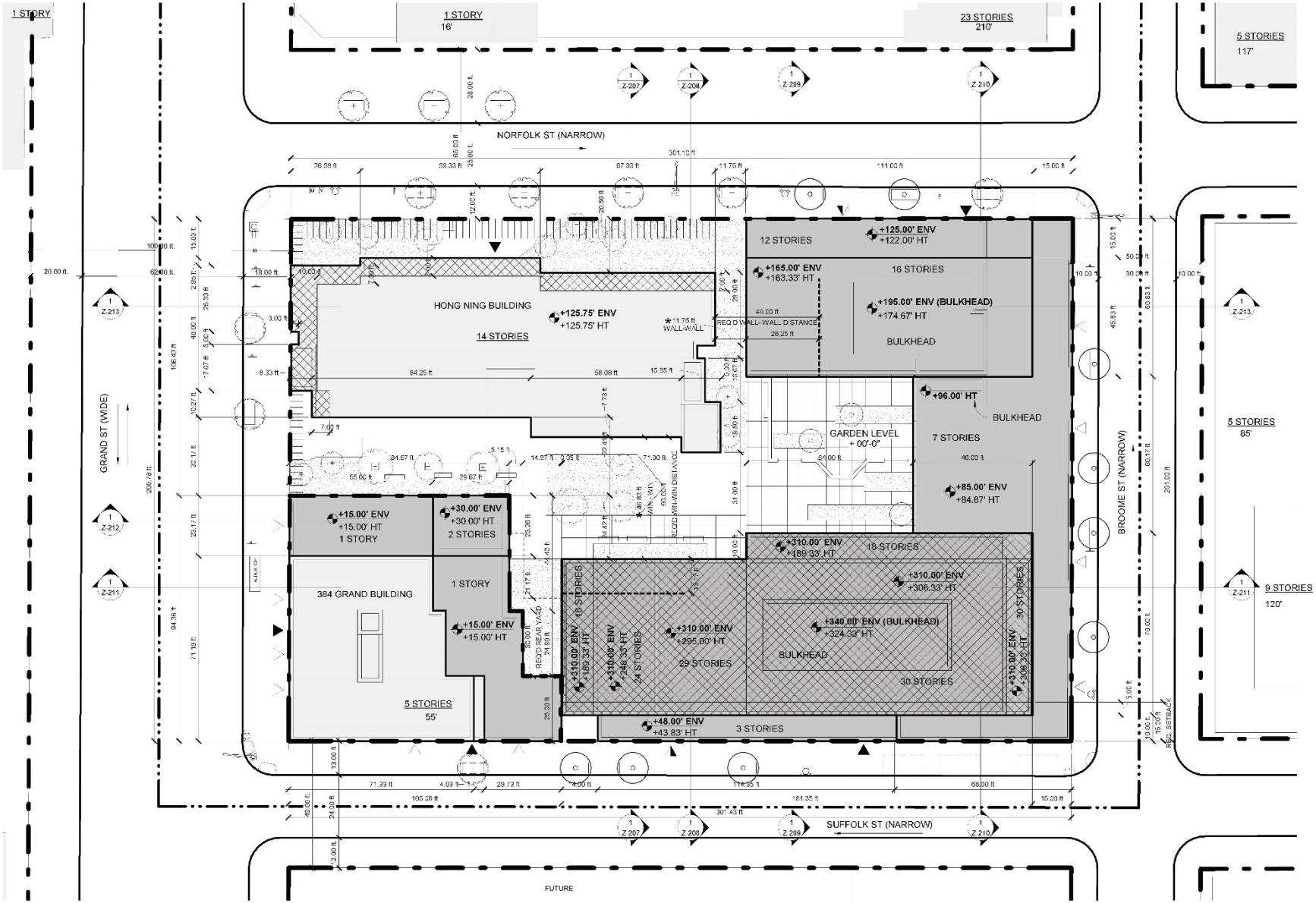


Figure 1-4 East Elevation (Suffolk Street)

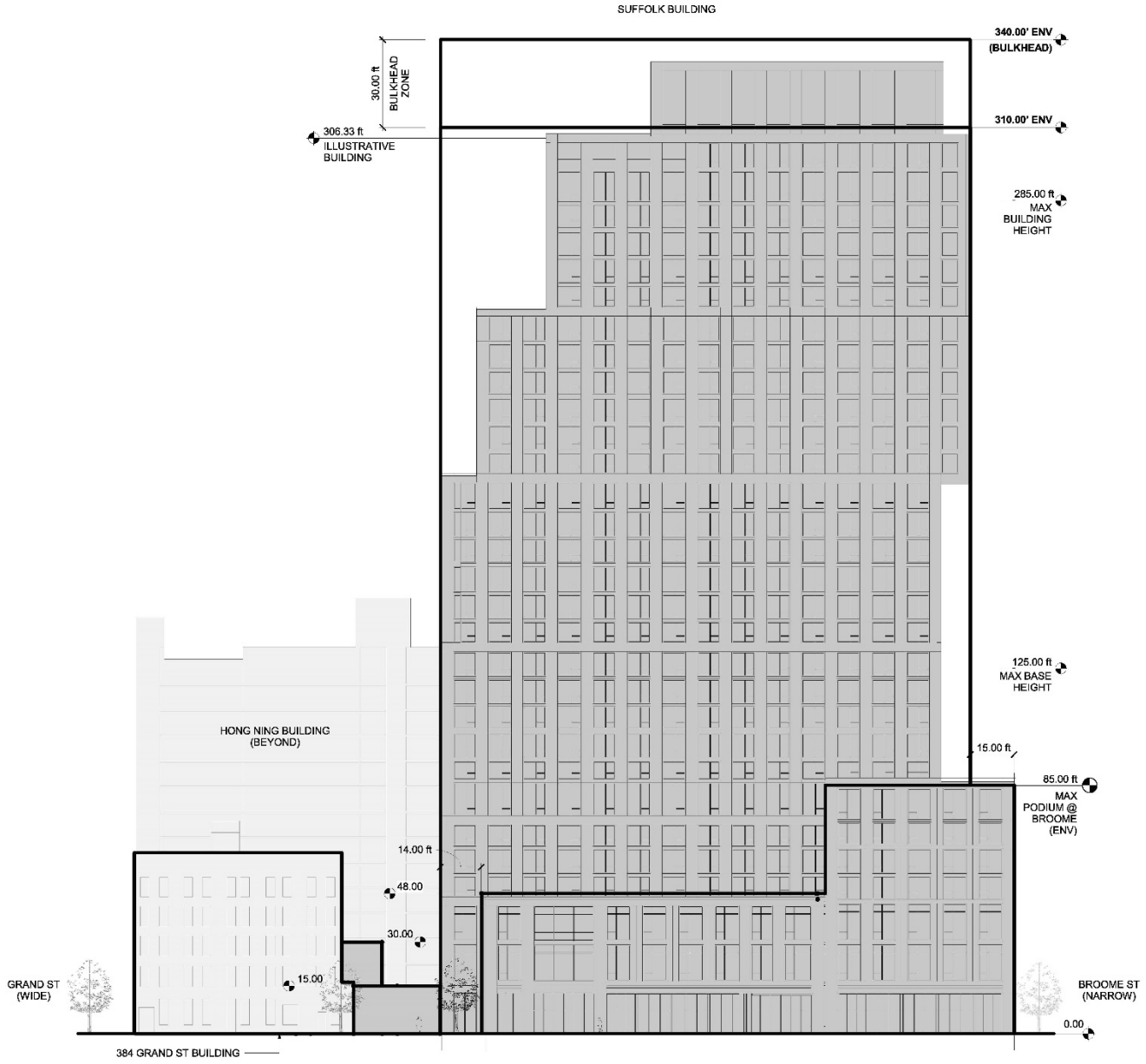


Figure 1-5 North Elevation (Broome Street)

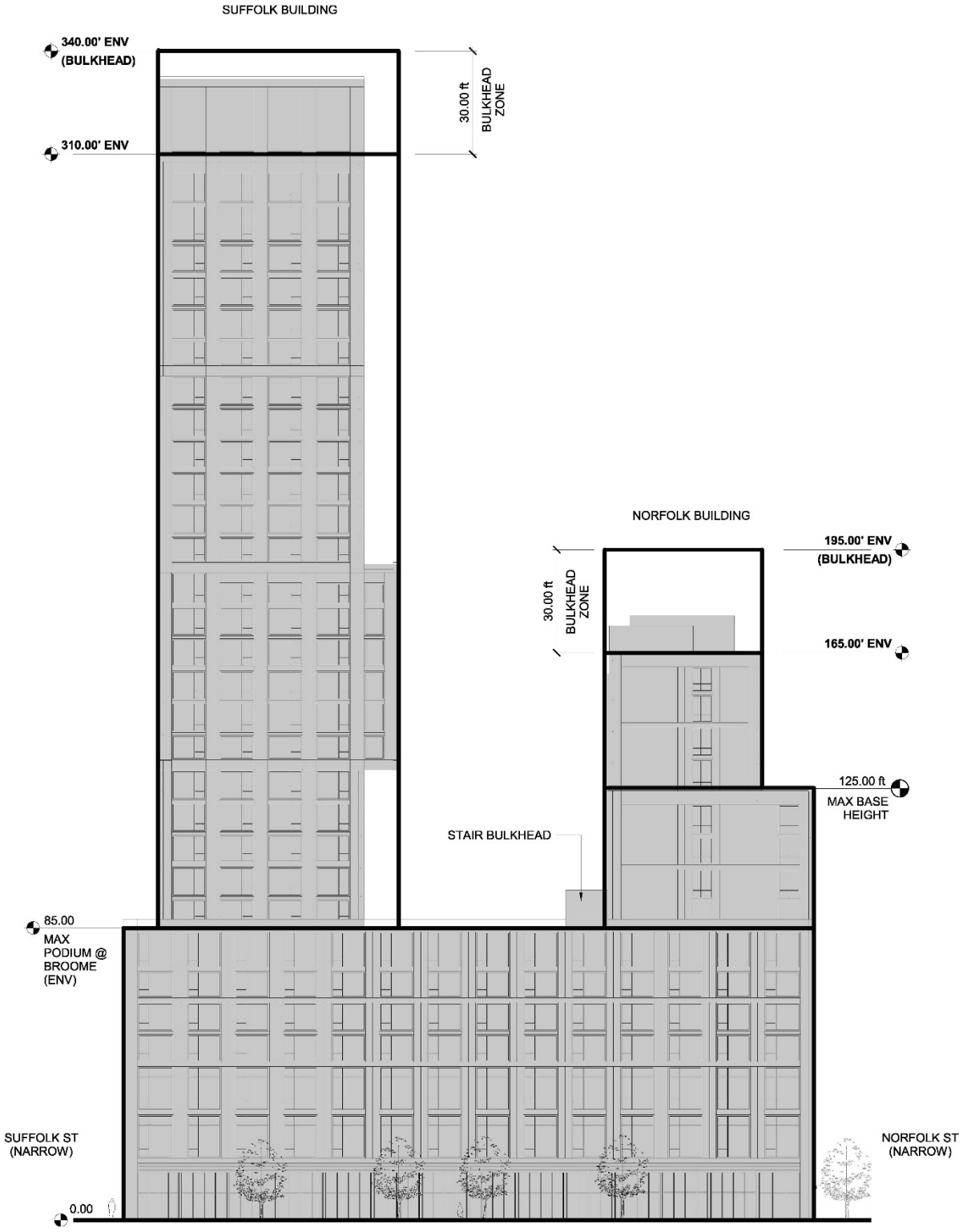
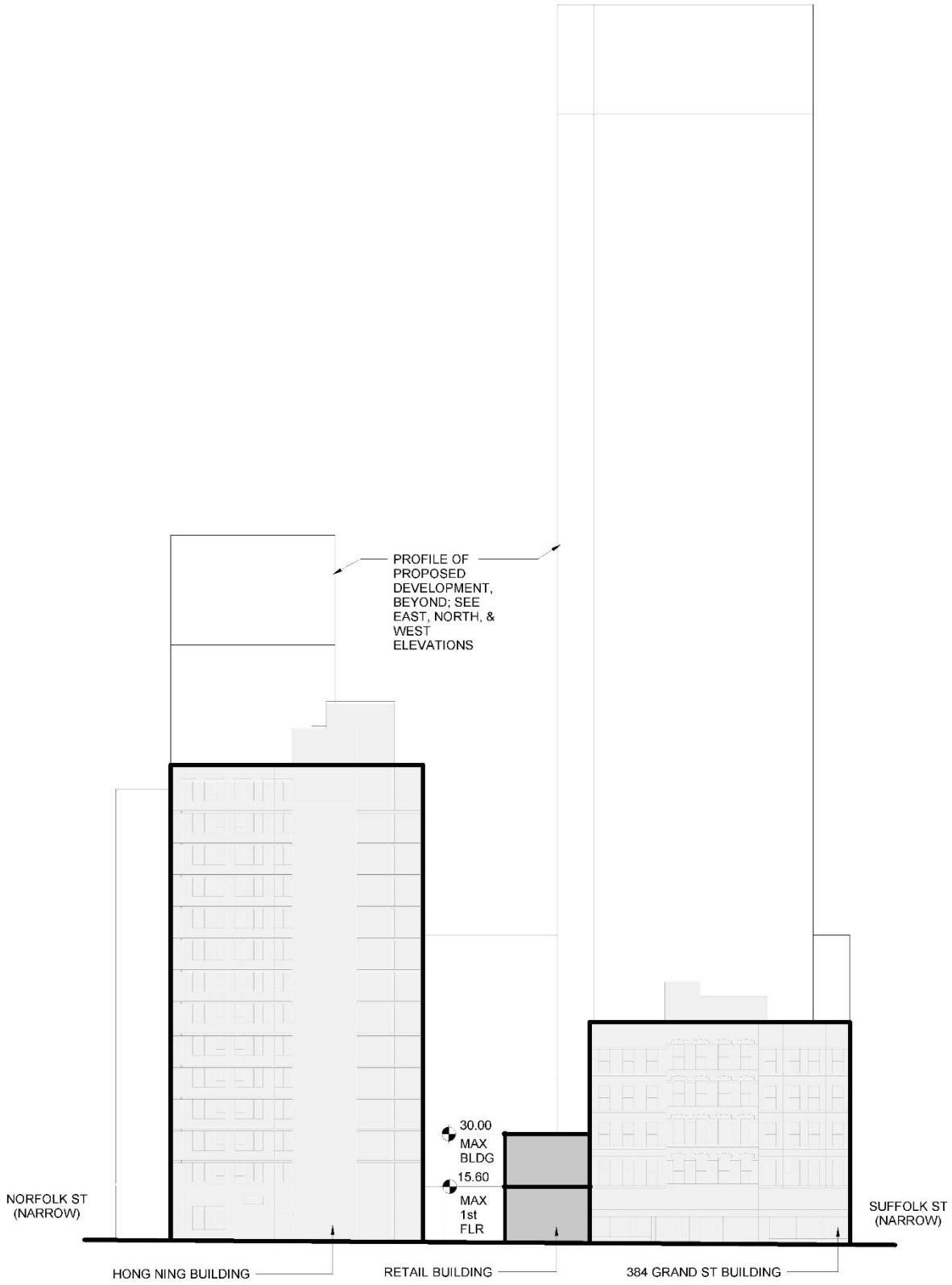


Figure 1-6 West Elevation (Norfolk Street)



Figure 1-7 South Elevation (Grand Street)



The applicant intends to comply with MIH Option 1, which requires at least 25 percent of residential floor area be for affordable housing units at an average of 60 percent Area Median Income (AMI). The current plan would exceed MIH Option 1 requirements: the proposed development on Projected Development Site 1 (the Norfolk and Suffolk Buildings) would include approximately 488 residential units, of which approximately 43 percent of total units—or 208 units—would be affordable. Overall, AMI levels would average to 53 percent. The proposed development would provide CPC with approximately 40,222 gsf of space to consolidate different locations for more than ten different programs. CPC would be provided with a separate entrance to its facilities on Suffolk Street. Additionally, space at the ground floor will be owned by BHH in the same location as its former home on Block 346, Lot 37. The BHH space will also have a separate entrance to its facilities on Norfolk Street.

Separate from the proposed development, in the future with the proposed actions, the owner of Projected Development Site 2 would retain the existing five-story mixed use building and develop additional commercial space totaling approximately 4,759 gsf on Block 346, Lot 95.

Table 1-2 summarizes the total development projected on the two projected development sites.

Table 1-2 Projected Development – Incremental Increase over No-Action condition

	Norfolk Building	Suffolk Building	Projected Development Site 2	Total
Commercial GSF	0	18,788	4,759	23,547
Community Facility GSF	3,788	40,222	0	44,010
Residential GSF	82,923	316,421	0	399,344
Total GSF	86,711	375,431	4,759	466,901
Market-rate Units	0	280	0	280
Affordable Units[3]	115	93	0	208
Total Residential Units	115	373	0	488

1.5 Project Purpose and Need

The applicant believes the proposed project would support the community by providing community facility space for CPC. The proposed development, which would provide CPC with an approximately 40,222 gsf community facility, would enable CPC to house its new headquarters and maintain its identity in the Lower East Side Community, consolidating many of its operations under one roof. Additionally, CPC would have a separate entrance to its facilities on Suffolk Street, thereby establishing a permanent and highly visible presence in the neighborhood it serves. Space at the ground-floor of the Norfolk Building for BHH use as

[3] The current plan is to provide approximately 93 MIH units in the Suffolk Building and approximately 115 AIRS units in the Norfolk Building. The AIRS units are subject to City financing. If financing is unavailable, the Norfolk Building would be developed pursuant to MIH and include a set-aside of non-AIRS permanently affordable housing units.

a cultural heritage center would allow BHH to maintain its presence and identity in the Lower East Side.

Furthermore, the applicant believes the proposed development would be consistent with City policy by introducing new, permanently affordable housing within the neighborhood, including critically needed affordable housing for seniors. According to Mayor de Blasio's affordable housing plan, Housing New York (as supplemented by Housing New York 2.0), the population of City residents who are at least 65 years old is projected to increase by 40 percent between 2010 and 2040, and there is an anticipated housing need for more than 400,000 additional seniors in the coming years. These seniors are more likely to be low-income, rent-burdened, and to live on a fixed income than other City residents. The 208 affordable units that would be built as part of the proposed development would create permanently affordable homes for those earning on average less than 53 percent of the Area Median Income, when averaging the AMI levels of the MIH and AIRS units.

The proposed development would also unlock the development potential of long underutilized private property—namely the parking lot on Block 346, Lot 75—and create affordable homes in the process, consistent with the Housing New York plan, which lists activating underutilized parcels to maintain the current pace of new construction of affordable housing as one of its main goals.

In order to accomplish the applicant's stated goals, the applicant is requesting the land use actions described above ("1.3 Proposed Actions"). The actions are necessary for the viability of the proposed project. The proposed rezoning and special permits pursuant to ZR Sections 78-312(a), 78-312(d), and 78-312(f) would result in changes to bulk, height, setback, minimum spacing requirements, and uses to support the density necessary to provide the amount of affordable housing and community facility uses to be included in the proposed project. The text amendment to designate the project block as an MIH area is being sought because it is consistent with City policy in connection with the rezoning from R8 to R9-1. In addition, the applicant feels that the proposed actions, including the text amendment to allow use of Quality Housing Program regulations, would produce a design for the proposed project that is in character with the built context of the surrounding area. The authorization pursuant to ZR 13-443 is being sought to eliminate parking at the site, which is not actively used by the Hong Ning building so that the proposed project could be constructed. In addition, and as noted above, the ZR Section 78-311(e) authorization and the ZR Section 78-312(d) special permit would replace earlier waivers sought in connection with the development of the Hong Ning building and would avoid the Hong Ning building becoming a non-complying building with respect to the Quality Housing bulk regulations.

1.6 Analysis Framework and Reasonable Worst-Case Development Scenario

The *2014 CEQR Technical Manual* will serve as guidance on the methodologies and impact criteria for evaluating the potential environmental effects of the proposed development that would result from the discretionary action. If the proposed action allows for a range of possible scenarios that are considered reasonable and likely, the scenario with the worst environmental consequences is chosen for CEQR analysis. This is considered to be the

reasonable worst-case development scenario (RWCDS), the use of which ensures that, regardless of which scenario actually occurs, its impacts would be no worse than those considered in the environmental review. The CEQR assessment examines the incremental differences between the RWCDS of the future without the proposed actions in place (No-Action condition) and the future with the proposed actions in place and the associated development operation (With-Action condition).

For the purpose of the environmental analyses, the No-Action condition represents the future absent the proposed actions and serves as the baseline by which the proposed project (or With-Action condition) is compared to determine the potential for significant environment impacts. The difference between the No-Action and With-Action conditions represents the increment to be analyzed in the CEQR process.

Future No-Action Condition

Projected Development Site 1 would remain in its existing condition in the No-Action condition. Because of the existence of the LSRD and the fact that Block 346, Lot 75 is part of the LSRD and designated as accessory parking for the existing Hong Ning senior housing building on Block 346, Lot 1, there is no development that could occur as-of-right.

Projected Development Site 2 would not be developed in the No-Action condition because such development could not occur without the proposed zoning map amendment (the existing R8 zoning precludes new commercial floor area). The building currently contains ground floor commercial uses, which were in existence prior to the enactment of the current Zoning Resolution and are thus legal non-conforming uses.

Future With-Action Condition

The With-Action condition includes two projected development sites—Projected Development Site 1, which consists of Block 346, Lot 37 and 75, and Projected Development Site 2, which consists of Lot 95. As stated previously, in the future With-Action condition, Projected Development Site 1 would be developed with the Norfolk and Suffolk Buildings, totaling 462,142 gsf:

- **Suffolk Building:** A 30-story, 310-foot-tall mixed-use (without bulkhead) building with 316,421 gsf of residential space, 40,222 gsf of community facility space to be owned by CPC, and 18,788 gsf of retail space facing Broome Street.
- **Norfolk Building:** A 16-story, approximately 165-foot-tall (without bulkhead) building with 82,923 gsf of residential space and 3,788 gsf of community facility space.

Together, the two buildings would include approximately 488 residential units inclusive of up to 208 affordable residences (composed of up to 93 MIH and 115 AIRS residences), representing overall affordability of approximately 43 percent across the proposed development.

Separate from the proposed development, in the future With-Action condition, the owner of Projected Development Site 2 would retain the existing five-story mixed use building and develop additional commercial space totaling approximately 4,759 gsf on Lot 95.

The proposed project will effectively maximize the development floor area and building envelope on Projected Development Sites 1 and 2, thereby representing the RWCDS for environmental review. Block 346, Lot 1 is developed with the existing 14-story Hong Ning senior housing building which will not be modified as a result of the proposed land use actions other than the rezoning. Block 346, Lot 95 is developed with an existing building built in the 1920s and consisting of 26 units. As part of the proposed actions, Lot 95 would be rezoned and approximately 15,000 zoning square feet of excess development rights would be transferred to Block 346, Lot 37 and used to generate affordable housing. Independent of the proposed development, the owner of Block 346, Lot 95 would retain the existing five-story mixed use building and increase its commercial space by 4,759 gsf. Future development on Lot 95 would be governed by the LSRD.

Increment for Analysis

In total, the With-Action condition would result in a net increase of 466,901 gsf over the No-Action scenario, with approximately 399,344 gsf dedicated to residential space, 44,010 gsf for community facility space, and 23,547 gsf for commercial space. The EIS analyzes all 488 units as non-senior units.

Table 1-3 summarizes the reasonable worst-case development scenario.

Table 1-3 Increment for Analysis

	Existing Conditions	Norfolk Building	Suffolk Building	Projected Development Site 2	Total Proposed GSF
Commercial GSF	4,118	0	18,788	4,759	23,547
Community Facility GSF	0	3,788	40,222	0	44,010
Residential GSF	18,248	82,923	316,421	0	399,344
Total GSF	22,366	86,711	375,431	4,759	466,901
Market-rate Units	26	0	280	0	280
Affordable Units	0	115	93	0	208
Total Residential Units	26	115	373	0	488

Analysis (Build) Year

The 2023 build year assumes receipt of project approvals in 2020 and a 2.5-year construction period (approximately 30 months) with the Norfolk Building complete within 24 months and the Suffolk Building complete within 30 months. The small commercial development on Projected Development Site 2 would take less than two years to complete.