Last-Mile Facility Text Amendment

Draft Scope of Work for an Environmental Impact Statement

CEQR Number

25DCP067Y

Lead Agency:

New York City Department of City Planning

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I. INTRODUCTION

This Draft Scope of Work outlines the technical areas to be analyzed in preparation of the Draft Environmental Impact Statement (DEIS) for the Last-Mile Facility Text Amendment, the "Proposed Action." The Proposed Action is a citywide zoning text amendment that would introduce a City Planning Commission (CPC) Special Permit for new Parcel Delivery Facilities in M, Special Mixed Use (MX), and C8 districts. A Parcel Delivery Facility is a type of distribution warehouse used primarily for unloading & sorting pre-packed goods and reloading those goods onto vehicles certified as Federal Highway Administration (FHWA) Vehicle Weight Classes 1-5 for final delivery. Little to none of the following activities occur - extended inventory storage, picking & packing, wholesale distribution, or retail.

With the rise of e-commerce and the fast, direct-to-consumer shipping, Parcel Delivery Facilities have become a more common part of New York City's logistic landscape. These facilities are a necessary step in getting goods to New Yorkers; however, they generate more trips than a traditional warehouse, impacting traffic, roadway safety and air quality. These challenges are exacerbated when large facilities are located near where people live. With demand for packages expected to continue, the Proposed Action intends to ensure more appropriate siting of future Parcel Delivery Facilities and encourage a more sustainable freight network.

II. REQUIRED APPROVALS AND REVIEW PROCEDURES

The proposed zoning text amendment encompasses a discretionary action that is subject to review under Section 200 of the City Charter, and the City Environmental Quality Review (CEQR) process.

The Proposed Action to introduce a City Planning Commission Special Permit for new last-mile facilities (Parcel Delivery Facilities) is classified as Type I, as defined under 6 NYCRR 617.4 and 43 RCNY 6-15, subject to environmental review in accordance with CEQR guidelines. An Environmental Assessment Statement (EAS) was completed on March 28, 2025. A Positive Declaration, issued on March 28, 2025, established that the Proposed Action may have a significant adverse impact on the environment, thus warranting the preparation of an Environmental Impact Statement (EIS).

The CEQR scoping process is intended to focus the EIS on those issues that are most pertinent to the Proposed Action. The process allows other agencies and the public a voice in framing the scope of the EIS. The scoping document sets forth the analyses and methodologies that will be utilized to prepare the EIS. During the period for scoping, those interested in reviewing the Draft Scope may do so and give their comments to the lead agency. The public, interested agencies, Community Boards, and elected officials, are invited to comment on the Draft Scope of Work, either in writing or orally, at a public scoping meeting to be held on May 6, 2025 starting at 2:00 PM. Instructions on how to view and participate, as well as materials relating to the meeting, will be available at the New York City Department of City Planning (DCP) Scoping Documents webpage[1] and NYC Engage website[2] in advance of the meeting. To continue to allow for broad public participation options, DCP will hold the public scoping meeting remotely. Comments received during the Draft Scope's public hearing and written comments received until 5:00 pm on May 16, 2025, will be considered and incorporated as appropriate into the Final Scope of Work (Final Scope). The lead agency will oversee preparation of the Final Scope, which will incorporate all relevant comments made on the Draft Scope, and revise the extent or methodologies of the studies, as appropriate, in response to comments made during scoping. The Draft EIS (DEIS) will be prepared in accordance with the Final Scope.

Once the lead agency is satisfied that the DEIS is complete, the document will be made available for public review and comment. A public hearing will be held on the DEIS in conjunction with the CPC hearing on the

[1] https://www.nyc.gov/site/planning/applicants/scoping-documents.page
[2] https://www1.nyc.gov/site/nycengage/index.page

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

III. PURPOSE AND NEED

The rise of e-commerce, changing consumer preferences and population growth have led to a proliferation of specialized e-commerce warehouses where parcels are quickly sorted before being sent to their final destinations. These specialized warehouses ("Parcel Delivery Facilities") play a critical role ensuring New Yorkers receive goods ordered online in a timely and efficient manner, but, as demand for deliveries grows, conflicts between the facilities that manage deliveries and city residents have become more acute.

In particular, large Parcel Delivery Facilities tend to create more traffic than other types of warehouses. That traffic and its related impacts on air quality and traffic safety is felt more by New Yorkers who live in industrial areas or on the border of residential and industrial areas. Parcel Delivery Facilities are not permitted in residential zoning districts, but they are sometimes sited in manufacturing districts as close to household consumers as possible in order to meet short delivery times.

The following paragraphs will define the types of warehouses being discussed, articulate current demand for these facilities and ways that demand is evolving, describe how zoning currently regulates warehouses and delivery facilities and the need for zoning updates to better regulate the delivery system for New Yorkers, and outline other government actions being taken to make the freight network more efficient.

The Proposed Action, described in Section IV, intends to better regulate Parcel Delivery Facilities by creating more oversight and ensuring future facilities are sited appropriately.

Defining Parcel Delivery Facilities

A third of adult New Yorkers will receive a package today[3]. How someone orders an item at the click of a button and receives their package on their doorstep or in their lobby only a few days later is a logistical feat made possible with decentralized and localized delivery models. To meet demand for more, fast and reliable deliveries, parcel delivery companies and retailers have created a network of warehouses designed to handle the rapid turnover of goods for delivery to individual consumers. The last warehouse in this supply chain, commonly referred to as a last-mile facility, is located near end-users and specializes in the final leg of a parcel's journey from being ordered to arriving at someone's door.

Much of New York City's warehousing space could arguably be considered last-mile, since businesses choose to locate here, where land is expensive, in order to be near a large customer base. For clarity, the Proposed Action and the following sections focus on a specific type of last-mile warehouse, a Parcel Delivery Facility.

A Parcel Delivery Facility is a type of distribution warehouse used primarily for unloading and sorting pre-packed goods and reloading those goods primarily onto vehicles certified as Federal Highway Administration (FHWA) Vehicle Weight Classes 1-5 for final delivery[4]. Unlike traditional warehouses, which have three primary functions of inventory storage, picking & packing[5], and delivery, Parcel Delivery

[3] NYCDOT – Citywide Mobility Survey Results, https://www.nyc.gov/html/dot/downloads/pdf/2022-cms-report.pdf

[4] Includes: pickup trucks, box trucks, and medium refrigerated trucks.

[5] Picking & packing is the act of selecting items from inventory (picking) and placing them in a box or mailer (packing) for shipping.

Facilities are largely used for delivery. Additionally, Parcel Delivery Facilities have limited if any wholesale distribution or retail onsite (**Figure 1: Examples of Parcel Delivery Facilities**).

Figure 1: Examples of Parcel Delivery Facilities

280 Richards Street in Red Hook, Brooklyn (Top) and 55-90 48th Street in Maspeth, Queens (Lower)

Source: Street Smart by Cyclomedia

Current Zoning Regulating Warehouses

Zoning Regulations Within Industrially Zoned Areas

Last-mile facilities, or Parcel Delivery Facilities, are not a named land use in the NYC Zoning Resolution (ZR). They are generally classified in Use Group IX(A) General Storage as Warehouses and are permitted as-of-right in industrially zoned areas, specifically, C8 districts (ZR 32-191), M1, M2, and M3 districts (ZR 42-191), and MX districts, which pair an M1 district with a Residence District (**Figure 2: Areas Where Warehouses are Permitted As-of-Right**). The term “as-of-right” means that construction or use of a building for a particular purpose does not require review by the Department of City Planning or approval by the City Planning Commission or Board of Standards and Appeals. Most developments in the city are as-of-right.

Figure 2: Areas Where Warehouses are Permitted As-of-Right

Zoning Regulations Within Commercial and Residential Zoning Districts

Generally, new warehouses (and, therefore, new Parcel Delivery Facilities under current zoning) are not permitted in residential or commercial districts (except C8). Post offices and micro-distribution facilities are permitted in some commercial zoning districts, as described below.

A micro-distribution facility is a named “use” within Use Group IX of the ZR and is permitted as-of-right in most commercial zoning districts with size limitations. A micro-distribution facility might carry out similar activities as a Parcel Delivery Facility but on a smaller scale. In C1 and C2 districts, which are thought of as local commercial districts, micro-distribution facilities are not permitted as-of-right in -1 through -4 suffix districts outside the Borough of Manhattan (ZR 32-192). In other C1 and C2 districts, the size of the facility is limited to 2,500 square feet (sf). In higher-density commercial areas (C4 through C7), facilities are limited to 5,000 sf on the ground floor and 10,000 above the ground floor. Such size limits may be increased by Special Permit; see ZR 32-193 for more details. Micro-distribution facilities are not permitted in residential districts or C3/C8 zoning districts.

Retail and service establishments that provide postal or courier services are considered part of Use Group VI and are permitted as-of-right in all commercial and manufacturing zoning districts (except C3). An example is the UPS Store, a retail shop primarily supplying shipping and mailing services to in-person customers. Additionally, the United States Postal Service (USPS) is not subject to local zoning due to the federal supremacy clause of the United States Constitution and, therefore, is not required to follow the location and size regulations outlined in zoning.

Demand Drivers

The growth of e-commerce, changing consumer expectations and population growth have fueled demand for packages and the facilities that deliver those packages. From 2000 and 2023, the share of online retail as a percentage of total retail sales increased from 0.9% to 15.3%. Accordingly, supply chains have shifted from traditional retail models - where inventory is held at brick-and-mortar stores, comes in via a large truck and leaves with individual customers – to an e-commerce model. Today's system relies on short order fulfillment cycles, the time between a customer placing and receiving an order has shrunk dramatically. An order is received, fulfilled, packed and delivered within a few days or even hours.

While people have become accustomed to the convenience and choice offered by online shopping and quick delivery, the city's population also grew from 8 million people in 2000 to 8.8 million in 2020. These factors contributed to the dramatic increase in the overall number of packages moving through the five boroughs. In 2017, the earliest available citywide estimates, approximately 1.1 million packages were delivered on a typical day in New York City. Two years later, that figure grew to 1.8 million packages per day in 2019. Then in 2020, with the COVID-19 pandemic accelerating existing trends, approximately 2.3 million packages were delivered daily, an increase of nearly 30% in one year. By 2024, the number continued to rise, but at a slower rate – growing less than 10% in four years to 2.5 million deliveries per day[6].

Real Estate and Siting Considerations

Responding to demand, parcel delivery operators sought more space in New York City and the real estate market delivered. In the 2000s, there was a moderate increase in Parcel Delivery Facilities, followed by exponential growth in the 2010s and through the pandemic. As e-commerce growth has stabilized since 2022, the number of new Parcel Delivery Facilities opening has slowed, although interest in Parcel Delivery Facilities remains as the city's housing and economy continues to grow.

As described current zoning does not permit Parcel Delivery Facilities to locate outside of the city's manufacturing districts (except C8), though some long-standing facilities pre-date zoning and exist elsewhere in the city. New facilities must comply with zoning and thus seek real estate in manufacturing districts, but with a preference for those that have good access to consumer markets. Retailers promise and consumers expect speed. This expectation has placed tremendous pressure for Parcel Delivery Facilities siting in the manufacturing districts closest to where consumer demand is – the city's residential neighborhoods.

Operators of such facilities tend to prefer relatively large sites with room for vehicle maneuverability and fleet parking as well as ground floor space for ease of loading and unloading goods.

Further discussion of existing Parcel Delivery Facilities is in Section V.

Vehicles And Traffic

Large Parcel Delivery Facilities tend to create more traffic than traditional warehouses. Since these facilities tend to locate as close to consumers as possible in order to meet short delivery times, the traffic – and particularly the queueing and deployment of delivery vehicles - is felt most acutely by nearby residents.

Parcel Delivery Facilities have emerged as a use distinct from more general warehouses. Such facilities prioritize the movement of goods, rather than other warehousing activities like long to medium-term storage, assembly or pick and pack. They have high vehicle and goods throughput and may operate up to 24 hours a day. According to the Institute of Transportation Engineers (ITE), a standard warehouse on an average

[6] Rensselaer Polytechnic Institute Center of Excellence for Sustainable Urban Freight Systems (2022).

weekday generates 1.71 vehicles per 1,000 sf. Meanwhile, a parcel hub - the closest ITE typology to a Parcel Delivery Facility - generates 4.63 vehicles[7].

High vehicle trips can affect congestion, traffic safety and air quality. More vehicles on a particular section of roadway can increase the potential for crashes and other conflicts, particularly with pedestrians. In terms of air quality, the emissions associated with vehicles coming into and out of Parcel Delivery Facilities are not limited to the facility site itself but are experienced most acutely where vehicle concentration is greatest. The NYC Department of Health and Mental Hygiene reported in a 12-year analysis of air pollutant levels that "the concentrations of NO2, NO and PM2.5 continue to be higher in industrial zones with more diesel truck traffic, neighborhoods with large numbers of restaurants, and areas of higher traffic and building density." [8]

Most medium-duty vehicles associated with Parcel Delivery Facilities, such as walk-in or multi-stop trucks, continue to rely on diesel engines, while the light-duty options, like sprinter vans, typically run on gas. Parcel delivery operators have begun investing in electrifying their fleets, but it takes time and investment to acquire electric vehicles and to have the power and infrastructure to charge them. New York City's zoning code has also recently been updated to encourage carbon-neutral buildings and facilitate electric vehicle charging.

The high vehicle trip generation of Parcel Delivery Facilities is most felt by New Yorkers when facilities are located near residential districts. Since the number of vehicle trips is correlated to facility size and electric vehicle adoption remains a gradual process, large Parcel Delivery Facilities can have a greater effect on the health, safety and welfare of New Yorkers. For that reason, the Proposed Action seeks to minimize conflicts between Parcel Delivery Facilities and residences by encouraging new facilities to be environmentally sustainable and further from districts that permit residences.

Greening The Freight Network

The need to address land use, traffic and air quality concerns related to Parcel Delivery Facilities is consistent with New York's larger interest in promoting a more sustainable freight network. The City is advancing policy for all points in the freight supply chain, from someone receiving their package to goods entering the five boroughs. Outlined below are some government-led initiatives aimed at making the delivery of goods citywide more sustainable.

Delivery Operations

Off-Hour Deliveries

Since 2009, the New York City Department of Transportation (NYC DOT) has encouraged goods to be delivered to businesses during less busy hours to reduce daytime congestion, lower carbon emissions and enhance street safety. Most recently, the agency launched the Off-Hour Delivery (OHD) Incentive Program and application portal, which aims to shift 62,000 daily trucks to off-peak hours by 2040. All NYC businesses involved in commercial deliveries are eligible to apply for one-time reimbursements to facilitate nighttime deliveries between 7 pm and 6 am. There are now over 1,100 OHD locations.

Truck Route Network Redesign

The New York City Truck Route Network plays a major role in the city's extensive freight infrastructure. NYC DOT is currently reviewing the existing network and plans to make recommendations for improvements, pursuant to Local Law 171 of 2023.

[7] Institute of Transportation Engineers, *Trip Generation Manual 11th Edition* (2021).
[8] NYC Department of Health and Mental Hygiene, *The New York City Community Air Survey: Neighborhood Air Quality 2008-2020* (2022).

Maritime Freight Blue Highways

NYC DOT and NYC Economic Development Corporation (EDC) are piloting a program to facilitate new transloading operations of waterborne freight to sustainable last-mile delivery methods at City-owned marine facilities. Marine cargo services can help reduce the City's dependance on trucking. With the Proposed Action, a water-dependent Parcel Delivery Facility would be permitted as-of-right, as discussed in Section IV.

Shared Use Lockers

NYC DOT's LockerNYC program launched in 2024 and has installed secure lockers on public sidewalks for people to receive and send packages. The program is designed to reduce delivery truck trips and cut down on package theft.

Micro-Hubs and Micro-Distribution

This year, NYC DOT is piloting curbside and off-street locations for truck operators to transfer deliveries to more sustainable modes, like cargo bikes, handcarts and small low-emission or electric vehicles for final delivery. In 2024, DCP modified zoning for commercial districts to allow micro-distribution facilities to encourage smaller-scale, more sustainable distribution activities (see Section IV for more zoning details). Comparatively, Parcel Delivery Facilities in industrially zoned areas (the subject of this environmental review) tend to be much larger in size.

Indirect Source Rule

The NYC Department of Environmental Protection (DEP) is exploring legislation that would allow the agency to regulate emissions associated with warehouse operations on an annual basis. The Proposed Action, meanwhile, is focused on the siting and opening of new Parcel Delivery Facilities.

Industrial Planning

The NYC Industrial Plan, outlined in Local Law 172-2023, aims to bolster the city's industrial sector by creating a comprehensive framework for the development and support of industrial and manufacturing businesses and jobs. It will explore how the city can best support the development of a modern, growing sustainable industrial economy and well-utilized industrial areas.

Vehicles & Charging

Truck Retrofits and Replacements

NYC DOT's Clean Trucks Program provides incentive funding for the replacement, retrofit or scrappage of older, heavy-polluting diesel trucks. The program was launched in 2012 in Hunts Point and expanded to NYC's Industrial Business Zones (IBZs) in 2020. Since then, it has replaced, retrofitted or retired over 700 diesel trucks, reducing particulate matter and nitrogen oxide.

Con Edison's PowerReady Incentive offers businesses, who are seeking to upgrade their sites to install medium- and heavy-duty vehicle charging infrastructure for their fleets, incentives that can cover up to 90 percent of the utility-side costs and up to 50 percent of customer-side costs of installing electric vehicle infrastructure (not including chargers) for qualifying sites.

Shared Truck Charging Depots

In 2024, EDC issued two, shared electric vehicle charging hub Requests for Proposals (RFPs) – one for medium- and heavy-duty vehicles in Staten Island, Queens and Manhattan and one for a freight-focused facility in Hunts Point in the Bronx. Both RFPs are aimed at accelerating the electrification of transportation infrastructure and reducing harmful air pollutants and particulate matter.

Commercial Cargo Bicycles

NYC DOT manages the largest cargo bike program in the country, encouraging companies to use cargo bicycles to make local deliveries. Since 2019, bicycles enrolled in the program have been able to load and unload in commercial vehicle loading zones and at designated cargo bicycle corrals.

E-Bike Safe Charging Accelerator

The City of New York with NYC DOT and the Fire Department of the City of New York (FDNY) started the NYC Safe Charging Accelerator in 2024. This initiative promotes sustainable deliveries by e-bikes and e-cargo bikes by expanding the availability of safe e-bikes and e-bike battery charging. The initiative includes clarifying battery charging regulations and guidance, allowing property owners to install battery charging and swapping cabinets on publicly owned land next to their buildings, launching an e-bike trade-in program for delivery workers, and installing wider bike lanes.

IV. DESCRIPTION OF PROPOSED ACTION

The Department of City Planning (DCP) proposes a citywide zoning text amendment that would introduce "Parcel Delivery Facility" as a new defined term to the ZR and create a City Planning Commission (CPC) Special Permit for new Parcel Delivery Facilities in M, MX, and C8 districts.

Defining Parcel Delivery Facility

Under this proposal, Parcel Delivery Facilities would remain in Use Group IX(A), but would become a specifically defined term in the ZR. As described in Section III, a Parcel Delivery Facility is a type of distribution warehouse used primarily for unloading & sorting pre-packed goods and reloading those goods onto vehicles certified as Federal Highway Administration (FHWA) Vehicle Weight Classes 1-5 for final delivery. Little to none of the following activities occur - extended inventory storage, picking & packing, wholesale distribution, or retail.

Creating A City Planning Commission Special Permit

A CPC Special Permit would be required for the defined use in certain cases specified below. By introducing a Special Permit, DCP proposes to establish a framework to conduct a case-by-case, site-specific review process to ensure last-mile development occurs on appropriate sites with reasonable considerations for surrounding land uses, environmental health, and traffic. The proposed Special Permit would be a discretionary action by the CPC subject to the Uniform Land Use Review Procedure (ULURP). In the public review process, the Community Board, Borough President and CPC would review Special Permit applications, while City Council and Mayoral review would be optional.

Applicability

The Proposed Action would require a Special Permit for new Parcel Delivery Facilities in all M, MX, and C8 zoning districts. New Parcel Delivery Facilities would not be permitted in R and C1-C7 districts, the same as it is today, (see **Figure 3: Proposed Special Permit Areas of Applicability**).

If the Proposed Action is adopted, it would apply to new development and changes of use or conversion.

Figure 3: Proposed Special Permit Areas of Applicability

R, C1 – C6, and MX districts permit residences.

Exemptions

In M, MX, and C8 districts, new Parcel Delivery Facilities would not be subject to the Special Permit under the following conditions:

- The facility is less than 50,000 sf of floor area;
- The facility is a water-dependent (WD) use as defined in the ZR 62-211[9] or by similar standards to be specified by DCP. WD warehouses are warehouses that ship or receive materials or products by water as evidenced by operational docking facilities on the zoning lot; or
- The facility is more than 500 ft from zoning districts that permit residences (R, C1-C6, and MX districts) and meets certain electric vehicle charging infrastructure standards to be specified by DCP.

These exemptions would ensure that small facilities and facilities that meet the City's environmental and sustainability goals can be developed without requiring a future discretionary action to be sought.

Additionally, new Parcel Delivery Facilities on airport land or on property owned or leased by the USPS would not be subject to the Proposed Special Permit. The USPS is not subject to local zoning due to the

[9] https://zr.planning.nyc.gov/article-vi/chapter-2/62-211

federal supremacy clause. The Port Authority of New York and New Jersey (the "Port Authority") operates New York City's major airports pursuant to a lease agreement with the City of New York, which does not require the Port Authority to comply with local zoning requirements in the use or operation of developments on airport property.

Existing Parcel Delivery Facilities could continue to operate as legal, conforming uses, not subject to the provisions of the proposed Special Permit. DCP will evaluate regulations regarding vesting, enlargements and extensions of Parcel Delivery Facilities existing on the date of adoption. If damaged or destroyed, the reconstruction of a legacy Parcel Delivery Facility up to the previously existing Floor Area Ratio (FAR) would be permitted.

Zoning regulations already established around micro-distribution facilities would be unchanged by this proposal.

Findings

The Proposed Action would establish conditions in the ZR to aid the CPC in making its determination on whether to grant a Special Permit, including:

- Proximity: the location of the proposed use relative to communities disproportionately affected by the negative impacts of environmental pollution,
- Concentration: the potential for an inappropriate concentration of the use in the surrounding area,
- Environmental Impact: the potential for the use to create or contribute significantly to reduced air quality, increased greenhouse gas emissions or increased stormwater runoff,
- Remediation: the need to undertake environmental remediation work on the lot,
- Traffic & Safety: the potential for the use to contribute to serious traffic congestion or unduly inhibit pedestrian flow,
- Parking & Loading: the size and configuration of off-street parking and loading on the lot do not disrupt auto or pedestrian activity in the public right-of-way.
- Or other site planning and economic need factors to be developed by DCP.

Intended Effects Of Proposed Action

By introducing a Special Permit for the development of Parcel Delivery Facilities, DCP proposes to establish a framework of more case-by-case, site-specific review to ensure that the development of Parcel Delivery Facilities happens in an appropriate manner. DCP recognizes both the necessity of goods movement and the negative externalities of today's roadway- and fossil fuel-dependent system. The intended effect of the Proposed Action is to disincentivize development of large Parcel Delivery Facilities near zoning districts that allow housing and incentivize the use of more sustainable modes of delivery for new Parcel Delivery Facilities that will be necessary to meet New Yorkers' demand for e-commerce in the future. This is in line with the City's broader goal of developing a sustainable model for last-mile delivery that minimally impacts neighboring communities.

V. ANALYTIC FRAMEWORK

A Reasonable Worst-Case Development Scenario (RWCDS) analytic framework will be used to analyze the possible impacts of introducing the proposed Special Permit. A RWCDS estimates and compares a No-Action future condition (where the Proposed Action is not implemented) with a With-Action future condition (where the Proposed Action is implemented) to understand the change in permitted development and associated environmental impact that may occur by creating the Special Permit.

The RWCDS begins with a description of "existing conditions" to establish a baseline, not against which the Proposed Action's effects are measured, but from which future conditions can be projected. Predicting

future conditions begins with assessing existing conditions because these can be observed and measured. From this baseline, conditions expected in the future without the Proposed Action are evaluated (the No-Action condition). The No-Action condition considers changes that are known or expected to be in place by the future build year (see Analysis Year, below), independent of the Proposed Action. The No-Action condition is the baseline against which the effects of the Proposed Action can be measured. For this proposal, the areas directly affected are M, MX, and C8 zoning districts, where new Parcel Delivery Facilities are permitted as-of-right today and where the Special Permit would be applied in the future. After the future condition absent the proposed zoning text amendment is determined, the future condition with the proposed zoning text amendment is estimated (With-Action condition). The incremental difference between the No-Action and With-Action conditions serves as the basis for the environmental impact analyses. This framework is intended for analytical purposes and cannot precisely capture the character or totality of future Parcel Delivery Facility development, which is to a large extent unknown.

Prototypical Approach

The Proposed Action would apply citywide in M, MX, and C8 districts (with a few exceptions noted in the Description of Proposed Action). Per CEQR guidelines, since the Proposed Action has broad applicability, it is difficult to predict the universe of sites where development would be affected by the Proposed Action. Therefore, the Proposed Action will be analyzed in this environmental review as a “generic action.” According to the CEQR Technical Manual, generic actions have wide application or affect the range of future alternative policies. Usually, these actions affect the entire city or an area so large that site-specific description or analysis is not appropriate. To analyze the potential environmental impacts of such actions, environmental reviews typically utilize a conceptual/prototypical analysis.

Additionally, the zoning districts that permit Parcel Delivery Facilities are relatively dispersed within New York City; and the siting of such facilities is driven by demand. These factors make it challenging to forecast where facilities will locate in the future. Therefore, DCP will develop prototypes to generically determine the potential environmental impacts that could occur in the With-Action condition. Based on existing trends and reasonable projections, prototypical sites will be representative of recent Parcel Delivery Facilities, including purpose-built sites as well as a conversion of an existing warehouse. At least one prototype will account for development that may occur on a parcel near a zoning district that permits residences.

To account for development that may occur under the With-Action scenario, where a Parcel Delivery Facility would have been located under the No-Action Condition, at least one representative example will be developed. A representative example will consider industrial development. Although the Proposed Action is not anticipated to specifically induce other types of industrial development (as industrial development is already permitted as-of-right in M districts and numerous factors influence the kind of uses that are developed in any given area), it is the most plausible type of use given the zoning. The Proposed Action does not preclude other, non-industrial permitted uses from occupying the sites where a Parcel Delivery Facility would not be developed, but these other uses are relatively unlikely. Accordingly, the representative example analysis will focus on industrial uses, most likely a non-Parcel Delivery Facility warehouse use. These representative examples of industrial development will be selected based on recent trends in New York City and will be analyzed to better understand any potential environmental impacts associated with the With-Action scenario.

Areas Affected by The Proposed Action

The Proposed Action would introduce a CPC Special Permit for new Parcel Delivery Facilities in all M, MX, and C8 districts, where such facilities are permitted as-of-right today. Currently, 1.1 billion sf (25,750 acres) is zoned M, MX, and C8 in New York City (**Table 1: Lot Area Zoned M, MX, and C8 by Community District (CD)**). The proposed Special Permit would effectively create two areas within these zoning districts based on a residential buffer. Subarea 1 consists of M & C8 districts less than 500 ft from zoning districts that permit residences (R, C1 – C6, and MX districts). Subarea 2 comprises M & C8 districts more than 500

ft from zoning districts that permit residences and MX districts (**Figure 4: Proposed Special Permit Areas of Applicability and Community District Boundaries**).

In Subarea 1, new parcel delivery development would be subject to a Special Permit, except in instances where this use encompasses less than 50,000 sf of floor area or where the use is water-dependent. In Subarea 2, the same exemptions would apply as well as an exemption for facilities with the electric vehicle-charging capacity referenced above. The proposal of these two areas acknowledges concerns DCP has heard related to the environmental effects of Parcel Delivery Facilities, particularly those facilities located near residences, while also understanding the critical role Parcel Delivery Facilities play in moving goods for the city.

Table 1: Lot Area Zoned M, MX, and C8 by Community District (CD)

Borough	Community District	Lot Area *(Sf '000s)*	% of Total CD Area
Bronx	1	18,139	43%
	2	40,318	76%
	3	4,780	15%
	4	4,559	12%
	5	3,026	12%
	6	4,390	16%
	7	3,190	9%
	8	2,173	3%
	9	8,965	10%
	10	8,809	6%
	11	8,012	12%
	12	11,182	10%
Brooklyn	1	44,628	47%
	2	18,308	32%
	3	3,924	7%
	4	4,218	11%
	5	16,290	15%
	6	29,062	45%
	7	33,142	40%
	8	2,465	8%
	9	1,174	4%
	10	3,943	4%
	11	7,436	11%
	12	6,479	10%
	13	9,548	12%
	14	819	1%
	15	3,222	4%
	16	4,551	13%
	17	6,414	10%
	18	13,780	7%
Manhattan	1	2,509	7%
	2	11,057	41%
	3	2,045	6%
	4	16,231	40%
	5	4,327	15%
	6	1,855	7%
	7	22,832	35%
	8	1,614	2%
	9	1,705	7%
	10	642	3%
	11	5,368	10%
	12	3,966	6%
Queens	1	59,909	45%
	2	47,196	52%
	3	2,182	4%
	4	2,672	6%
	5	25,815	16%
	6	2,157	4%
	7	48,701	16%
	8	0	0%
	9	6,066	8%
	10	13,316	11%
	11	835	0%
	12	13,592	7%
	13	225,832	50%
	14	8,725	4%
Staten Island	1	61,307	19%
	2	102,371	22%
	3	99,661	20%
Citywide*		**1,121,426**	20%

**Citywide total does not include Community Districts 227, 356, 480, 481 and 483 because they are wholly parks or airports.*

Figure 4: Proposed Special Permit Areas of Applicability and Community District Boundaries

R, C1 – C6, and MX districts permit residences.

Analysis Year

In line with best practices outlined in the CEQR Technical Manual, a 2035 analysis year is assumed for environmental review purposes. CEQR requires analysis of the Proposed Action's effects on its environmental setting. For those projects that would be implemented quickly following approval, the current environment would be the appropriate environmental setting. However, proposed projects typically are completed and become operational at a future date, and therefore, the environmental setting is the environment as it would exist at project completion and operation. Therefore, future conditions must be projected. This prediction is made for a particular year, generally known as the “analysis year” or the “build year”.

As discussed in the CEQR Technical Manual, for some generic actions, where the build-out depends on market conditions and other variables, the build year cannot be determined with precision. In these cases, per CEQR guidelines, a build year ten (10) years in the future is considered reasonable, as it captures a typical cycle of market conditions and represents a timeframe within which predictions of future development may be made without a high degree of speculation. This is a typical time frame for area-wide rezonings not associated with a specific development, since it is assumed to be the length of time over which developers would act on the change in zoning and the effects of the Proposed Action would be experienced. Therefore, an analysis year of 2035 will be used for this environmental review.

Existing Condition

At the beginning of 2025, there were approximately 50 Parcel Delivery Facilities over 50,000 sf of building area in New York City, accounting for around 11 million sf in total. 47 of the sites are in M, MX, and C8 zoning districts, and an additional three are in non-conforming sites elsewhere in the city, meaning they existed prior to current zoning and would not be permitted if developed today in that location. More than half of the 47 facilities were developed in Subarea 1(lots in M/C8 districts less than 500 ft from districts that permit residences and in MX districts).

By borough, Queens had the most Parcel Delivery Facilities with 19, accounting for 5.3 million sf of building area. Queens was followed by Brooklyn and the Bronx with 14 and 8 Parcel Delivery Facilities, respectively. On average, Queens had larger facilities than Brooklyn and the Bronx. Manhattan had 5 facilities, totaling 1.6 million sf, while Staten Island had one 450,000 sf facility.

Table 2: Existing Condition, Number of Parcel Delivery Facilities Over 50,000 Sf

Borough	**Subarea 1** *M, C8 < 500 ft from Districts that Permit Residences, MX*	**Subarea 2** *M, C8 500+ ft from Districts that Permit Residences*	**Other** *Non-Conforming Outside of M, MX, and C8*	**Total***
Bronx	5	3	0	8
Brooklyn	8	6	0	14
Manhattan	5	0	3	5
Queens	8	11	0	19
Staten Island	0	1	0	1
Citywide	**26**	**21**	**3**	**47***

**Existing facilities located in districts outside of M/MX/C8 districts are considered non-conforming and are not included in the total.*

Table 3: Existing Condition, Floor Area of Parcel Delivery Facilities Over 50,000 Sf

Borough	**Subarea 1** *M, C8 < 500 ft from Districts that Permit Residences, MX*	**Subarea 2** *M, C8 500+ ft from Districts that Permit Residences*	**Other** *Non-Conforming Outside of M, MX, and C8*	**Total***
	(Sf '000s)			
Bronx	848	377	0	1,224
Brooklyn	1,052	1,204	0	2,256
Manhattan	1,410	226	234	1,636
Queens	2,432	2,817	0	5,250
Staten Island		450	0	450
Citywide	**5,742**	**4,848**	**234**	**10,759**

**Totals may not sum due to rounding.*

Since the turn of the century, NYC's stock of Parcel Delivery Facilities has gone through three phases of growth. From 2000 to 2009, a gradual increase in Parcel Delivery Facilities corresponded to the early adoption of e-commerce platforms. Less than one new facility was added per year. From 2010 to 2022, an acceleration phase, driven by rapid increases in online shopping and behavior shifts during the COVID-19 pandemic, resulted in more than two new facilities annually. Most recently, the opening of new Parcel Delivery Facilities in NYC has slowed, at the same time the growth in e-commerce has slowed. In 2023 and 2024, three new facilities open – an average of 1.5 per year.

There were also a few examples of Parcel Delivery Facilities closing since 2022, but this trend is inconclusive due to limited data. Therefore, closures are not included in **Figures 5 & 6** and are not discussed further in the DSOW.

Figure 5: Existing Condition, Cumulative Floor Area of Parcel Delivery Facilities Over 50,000 Sf, 2000-2024

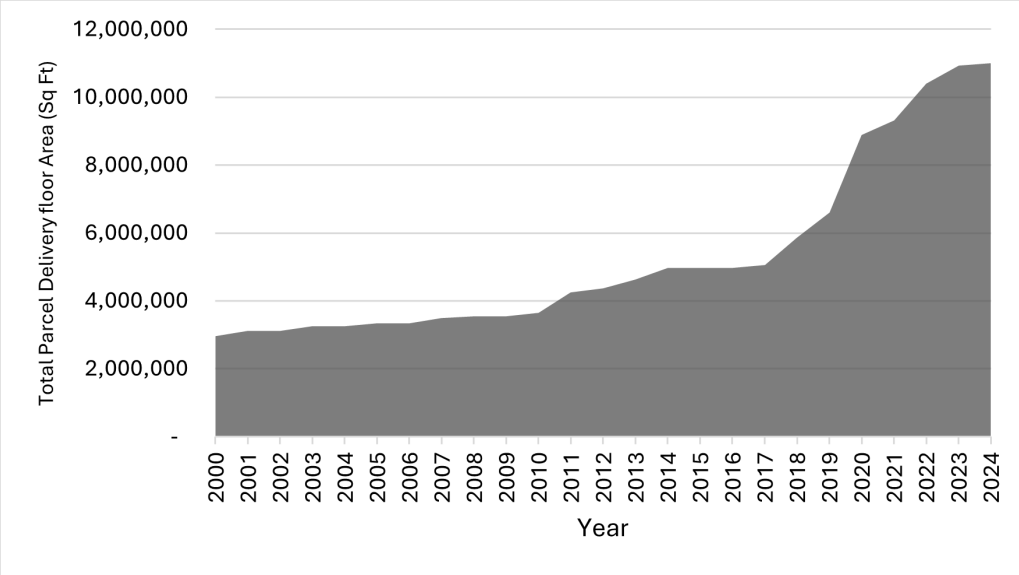
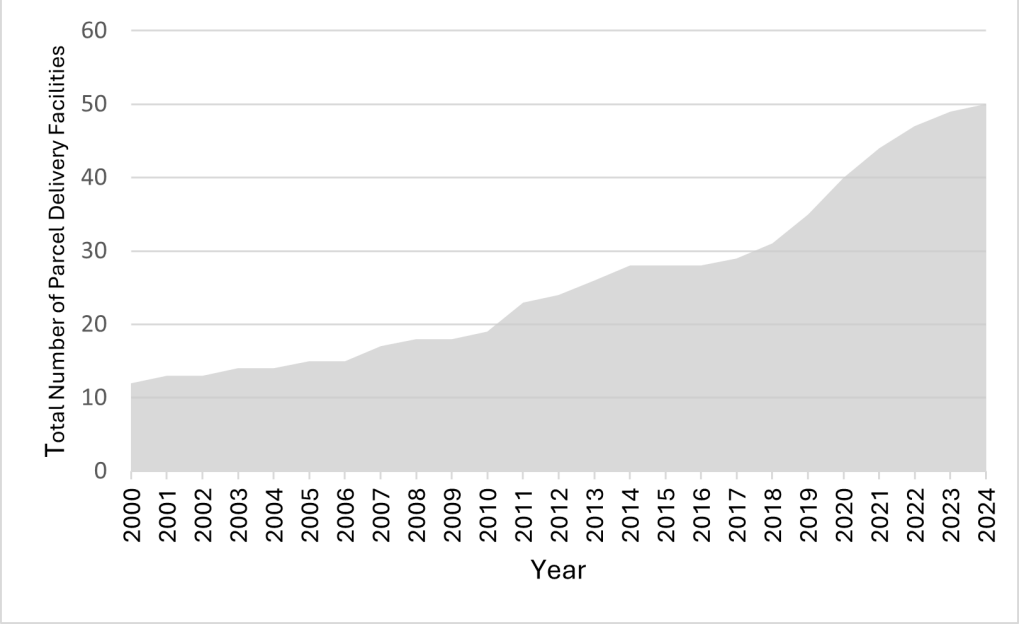


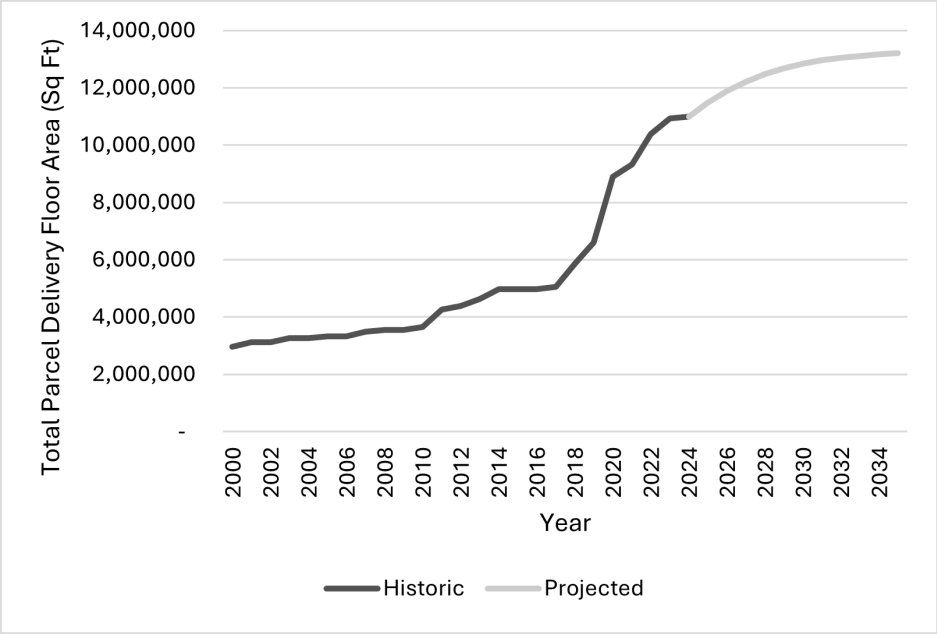
Figure 6: Existing Condition, Cumulative Number of of Parcel Delivery Facilities Over 50,000 Sf, 2000-2024



Future No-Action Condition

It is not possible to project with certainty the number and location of Parcel Delivery Facilities that could be developed in the No-Action condition. However, to complete a thorough environmental analysis and understand the potential impacts of the Proposed Action, a reasonable and conservative framework has been developed. This framework is based on parcel delivery development trends since 2000. Between 2000 - 2024, there were 39 new Parcel Delivery Facilities (over 50,000 sf) established, totaling 8,096,000 sf. As discussed in the Existing Condition section, historical development has been non-linear and displays a trajectory consistent with logistic growth. Therefore, an endogenous logistic growth model (S-curve model) was used to project the No-Action scenario. The model consists of fitting a logistic growth trend on the observed Parcel Delivery Facility square footage data from the year 2000 to the year 2024 and using that same trend to project into the future.

Figure 7: Historic and Projected Cumulative Floor Area of Parcel Delivery Facilities Over 50,000 Sf, 2000 – 2035



Only sites that went into operation on or after the year 2000 were used in the projection calculation.

Over the next decade, it is estimated that an additional 2,227,000 sf of parcel delivery floor area will open. Assuming these facilities are, on average, similar in size to existing conforming facilities (229,000 sf) this equates to approximately 10 new Parcel Delivery Facilities over 50,000 sf opening by 2035. This would be a 20% increase in Parcel Delivery Facilities and a 21% increase in parcel delivery floor area citywide by 2035 (analysis year) compared to the existing condition. On average, this would be one facility or 222,700 sf opening per year. Absent the Proposed Action, it is plausible to assume the new facilities would locate across the city following the existing condition distribution with approximately half of development in Subarea 1 and half in Subarea 2. This would mean five new facilities in both Subarea 1 and Subarea 2.

.0.30

Table 4: No-Action Condition, Projected Number of Additional Parcel Delivery Facilities Over 50,000 Sf

2025 vs. 2035	Subarea 1 *M, C8 < 500 ft from Districts that Permit Residences, MX*	Subarea 2 *M, C8 500+ ft from Districts that Permit Residences*	Total
Increment	5	5	**10**

Although there is a known construction pipeline of warehouse buildings, it is not known which will be used by Parcel Delivery Facility tenants versus other warehouse users. Therefore, the No-Action relies solely on projecting Parcel Delivery Facility growth trends from 2000 to 2024. Additionally, parcel delivery operators' real estate expansion plans are not publicly available, furthering the need to base the analysis on historical trend data.

Future With-Action Condition

As in the No-Action condition, it is not possible to project with certainty the number and location of Parcel Delivery Facilities that would be developed in the With-Action condition. Nevertheless, for the purposes of environmental review, a reasonable and conservative framework based on past parcel delivery development trends and other plausible assumptions was developed and explained in this section. The framework allows for an analytical approach but is not intended to capture the character or totality of future parcel delivery development, which is largely unknown.

The Proposed Action is to create a CPC Special Permit for new Parcel Delivery Facility operations, introducing a discretionary approval process into what is currently an as-of-right environment. Pursuing a Special Permit can add time, cost, and uncertainty to projects compared to an as-of-right development.

It is reasonable to assume the Proposed Action would shift the development of new Parcel Delivery Facility operations to locations outside the geographies where the proposed Special Permit would apply. The No-Action anticipated growth in the number of Parcel Delivery Facilities; outlined below are hypothetical scenarios of how those operators who intended to grow in the No-Action may respond to the Proposed Action.

Potential Scenarios

1. Seek the Special Permit and continue as planned.
2. Shift location within NYC to be outside the buffer and invest sufficiently in electric vehicle infrastructure.
3. Find an alternative site just outside of NYC.
4. No longer pursue a new site and instead intensify operations at existing sites.
5. No longer pursue one site of 50,000 sf and instead find one or two under 50,000 sf.

There is great uncertainty about which scenarios will be most prevalent, and the following assumptions were made to estimate the With-Action condition.

<u>Scenario 1: Seek Special Permit</u>

One Parcel Delivery Facility is estimated to have a Special Permit approved by the analysis year. Parcel delivery facilities often need to be located near population centers, so it could be assumed that some projects would seek a Special Permit in M/C8 districts less than 500 ft from districts that permit residences.

The most recent comparable Special Permits to the Proposed Action, the Self-Storage Special Permit (adopted 2017) and the M1 Hotel Special Permit (adopted 2018), serve as a guide to the usage of the Proposed Action. Since their respective adoptions, only two self-storage Special Permits have been approved (0.28 approvals per year), and zero M1 Hotel Special Permits have been approved (0 approvals

per year). Taking the average of both, it is assumed that only one Parcel Delivery Facility Special Permit would be approved by the analysis year, and it would be located in Subarea 1, where the Special Permit is necessary.

Scenario 2: Shift Location Within New York City and Invest in Electric Vehicle Infrastructure

It is estimated that six new facilities would follow this scenario (all in Subarea 2). A portion of these facilities may also have been developed under the No-Action Condition, while others, if not for the Proposed Action, may have located in Subarea 1. All of these would require electric vehicle-charging capacity.

Scenarios 3, 4, and 5: Other

The Proposed Action could increase Parcel Delivery Facility development in counties neighboring New York City, such as Westchester and Nassau in New York State and Bergen or Hudson in New Jersey, where land tends to be more available and less expensive. This assumption is reasonable because these nearby counties have warehousing today that serves the five boroughs. While CEQR procedures pertain to proposed discretionary actions specifically taking place within the boundaries of New York City, for a conservative analysis, the DEIS will include a qualitative assessment of this scenario's environmental effect on the City.

The importance of being as close as possible to the New York City market means some future Parcel Delivery Facilities would continue to locate within city boundaries. Proximity to those receiving parcels reduces travel time from facility to end destination in both absolute distance and in time, by minimizing potential for traffic congestion and delays.

In other circumstances, a developer may open one or two Parcel Delivery Facilities of less than 50,000 sf of building area in lieu of one larger facility to be exempt from the Special Permit. However, there is an efficiency of scale to parcel delivery development so this instance may be limited. There are a few examples of existing Parcel Delivery Facilities under 50,000 sf, but it has not been a recent trend to develop at this size and is generally seen as uneconomical.

A Parcel Delivery Facility operator with an existing footprint in New York City could also intensify their operations at existing facilities rather than develop a new facility under the Special Permit process. It is plausible to assume an operator would seek a new facility if their existing facilities were no longer adequate so this scenario may not be that prevalent.

For the purpose of environmental review, it is assumed one facility that would have been built in the no-action would follow each of the three scenarios outlined above (Scenarios 3, 4 and 5).

Cumulative Impacts of Scenarios

Overall, by 2035, it is estimated that in the With-Action seven new facilities over 50,000 sf would be developed in NYC – an increase of 15% in Parcel Delivery Facilities from existing conditions. This would amount to less than one facility per year. High demand for consumer goods with fast shipping and related distribution space will continue to drive the industry to seek and find siting opportunities in New York City, with or without the Proposed Action.

Table 5: With-Action Condition, Projected Number of Additional Parcel Delivery Facilities Over 50,000 Sf

Subarea 1 *M, C8 < 500 ft from Districts that Permit Residences, MX*	**Subarea 2** *M, C8 500+ ft from Districts that Permit Residences*	**Total**
1	6	**7**

No-Action And With-Action Condition Compared

The No-Action condition forecasted that 10 new Parcel Delivery Facilities or 2,227,000 sf of parcel delivery floor area would be developed in New York City between 2025 and the analysis year (2035). Around half of the development would be within Subarea 1 and half in Subarea 2. Meanwhile, the With-Action condition projected seven new facilities. Less than 15% of projected sites would be within Subarea 1 and 85% would be in Subarea 2.

Comparing the two, the With-Action condition anticipates that three fewer facilities over 50,000 sf would be developed within NYC. The With-Action condition also expects more development would occur in M and C8 districts more than 500 ft from R, C1-C6, and MX districts. The Proposed Action is expected to decrease the total number of new Parcel Delivery Facilities and the amount of additional parcel delivery floor area, while also shifting where new development occurs. The With-Action condition represents fewer, new facilities than the No-Action condition and anticipates those facilities would generally be located further from districts where residences are permitted and would have electric vehicle-charging capacity.

The Special Permit, demonstrated by the With-Action condition, is expected to help address concerns related to recent parcel delivery development while providing an appropriate path for siting new facilities critical to New York City's logistic landscape. By shifting potential future development and encouraging electric vehicle charging, the Proposed Action acknowledges issues of poor air quality from vehicle emissions, which are exacerbated by the high number of trips generated by Parcel Delivery Facilities and by large facilities located near where people live. The Special Permit would not affect Parcel Delivery Facilities as they exist today; Special Permits apply to future development.

Table 6: No-Action and With-Action Conditions Compared, Projected Number of Additional Parcel Delivery Facilities Over 50,000 Sf

Condition	Subarea 1 *M, C8 < 500 ft from Districts that Permit Residences, MX*	Subarea 2 *M, C8 500+ ft from Districts that Permit Residences*	Total
No-Action	5	5	**10**
With-Action	1	6	**7**
Difference	-4	+1	**-3**

VI. PROPOSED SCOPE OF WORK FOR THE DEIS

The Proposed Action would affect several areas of environmental concern, some of which have the potential to result in significant adverse impacts, pursuant to the EAS and Positive Declaration. An EIS will be prepared in conformance to SEQRA (Article 8 of the New York State Environmental Conservation Law), and its implementing regulations found at 6 NYCRR Part 617, New York City Executive Order No. 91 of 1977, as amended, and the Rules and Procedure for CEQR, found at Title 62, Chapter 5 of the Rules of the City of New York.

The analyses in the EIS will be based on the RWCDS. The Proposed Action will be examined as a generic action using a prototypical analysis, if applicable. Generic actions, according to the *CEQR Technical Manual*, have wide applications or affect the range of future alternative policies. Usually, these actions affect the entire city or an area so large that specific description or analysis is not appropriate. Therefore, all CEQR technical areas warrant assessment and would, therefore, be included in the EIS.

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

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

The specific technical areas to be evaluated in the EIS and the methodologies proposed to evaluate their effects are described below.

TASK 1. PROJECT DESCRIPTION

The first chapter of the EIS introduces the reader to the Proposed Action and sets the context in which to assess impacts. Included will be a description of the Proposed Action's background and/or history; a statement of the purpose and need of the Proposed Action; key planning considerations that have shaped the current proposal; a detailed description of the Proposed Action and the potential developments they would facilitate; and a discussion of the approvals required, procedures to be followed, and the role of the EIS in the process. This chapter is the key to understanding the Proposed Action and its impact and gives the public and decision-makers a base from which to evaluate the Proposed Action.

In addition, the project description chapter will present the planning background and rationale for the actions being proposed and identify the RWCDS that will form the basis of the technical analyses in the EIS. Included will be a summary of the approval process, its timing, and public review by the Community Boards, the Borough Board, Borough Presidents, CPC, and the New York City Council. The role of the EIS as a full-disclosure document to aid in decision-making will be identified.

TASK 2. LAND USE, ZONING AND PUBLIC POLICY

This chapter will assess the potential impacts of the Proposed Action on land use, zoning, and public policy, pursuant to the methodologies presented in the *CEQR Technical Manual*. The land use assessment characterizes the uses and development trends in the area that may be affected by a proposed action and determines whether a proposed action is compatible with those conditions. Similarly, the analysis considers the action's compliance with, and effect on, the area's zoning and other applicable public policies. The primary study area for this assessment would be citywide, reflecting the proposed text amendment for all C8 and Manufacturing zoning districts in New York City. Consistent with the Analytical Framework described above, the EIS will consider the Proposed Action's potential to adversely affect land use, zoning, and public policy by assessing prototypical sites, where applicable. A secondary study area will encompass the area within 400-feet of the prototypical sites used for analysis, which could experience indirect effects of the Proposed Action. The preliminary assessment will include the following:

- Brief development history of the primary and secondary study areas;
- Description and map of land use patterns and trends in the study areas, including recent development activity;
- Description and map of existing zoning and recent zoning actions in the study areas;
- Description of public policies that apply to the study areas, including: The City's Waterfront Revitalization Program and the City's sustainability policies;
- Discussion of predominant land use patterns, including recent land use trends and major factors influencing land use trends;
- List of future development projects in the study areas that are expected to be constructed by the 2028 analysis year and may influence future land use trends, including pending zoning actions or other public policy actions that could affect land use patterns and trends in the study areas. Based on these planned projects and initiatives, assessment of future land use and zoning conditions without the Proposed Action;
- Description of the Proposed Action and the potential land use changes resulting from the Proposed Action;
- Assessment of the effects of the Proposed Action on land use and land use trends, public policy, and zoning in the study areas. Discuss the Proposed Action potential effects related to issues of compatibility with surrounding land use, consistency with zoning and other public policy, and the effect of the Proposed Action on ongoing development trends and conditions in the study areas; and
- Preparation of a Consistency Assessment Form for the City's Waterfront Revitalization Program (WRP) as the Project Site is in the NYC Coastal Zone. The analysis will assess the consistency of the Proposed Action and resultant Proposed Project with the WRP policies.

TASK 3. SOCIOECONOMIC CONDITIONS

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

Pursuant to Section 310 of Chapter 5 of the *CEQR Technical Manual*, the socioeconomic study area boundaries are dependent on the size and characteristics of the Proposed Action and the resulting developments. A socioeconomic assessment seeks to assess the potential to change socioeconomic character relative to the study area population. For projects or actions that result in an increase in population, the scale of the relative change is typically represented as a percent increase in population (i.e., a project that would result in a relatively large increase in population may be expected to affect a larger study area). The Proposed Action will not result in an increase of dwelling units; therefore, the residential population will not increase.

The five principal issues of concern with respect to socioeconomic conditions are whether a proposed action would result in significant adverse impacts due to: (1) direct residential displacement; (2) direct business and institutional displacement; (3) indirect residential displacement; (4) indirect business displacement; and (5) adverse effects on specific industries.

The proposed action is not anticipated to result in adverse impacts with respect to direct residential displacement, direct business and institutional displacement, indirect residential displacement, or indirect business and institutional displacement. Nonetheless, to be conservative, these areas will be analyzed in the DEIS per CEQR Technical Manual guidelines.

The Proposed Action involves a citywide regulatory change that could adversely affect the economic and operational conditions of certain types of business or processes such that socioeconomic conditions would be affected in the neighborhood. Therefore, the Proposed Action could result in potential significant adverse impacts on specific industries and further analysis is warranted. An assessment of specific industries will be provided in the EIS and will begin with a preliminary assessment to determine whether a detailed analysis is necessary. Detailed analyses will be conducted for those areas in which the preliminary assessment cannot definitively rule out the potential for significant adverse impacts. The detailed assessments will be framed in the context of existing conditions and evaluations of the future No-Action and the worst-case With-Action condition in 2035, including any employment changes anticipated to take place by the analysis year for the Proposed Action.

TASK 4. COMMUNITY FACILITIES AND SERVICES

Community facilities, as defined under CEQR, include public or publicly funded schools, hospitals, libraries, day care centers, and fire and police protection Indirect effects result when increases in population create additional demand on service delivery. The demand for community facilities and services is directly related to the type and size of the new population generated by the development from a proposed action. According to the *CEQR Technical Manual*, a detailed community facility analysis is conducted when a Proposed Action would have a direct or indirect effect on a community facility.

The Proposed Action would not result in an increase of residential development. For conservative purposes, a preliminary screening assessment of any potential impacts on community facilities and services will be provided in the EIS.

TASK 5. OPEN SPACE

As described in the *CEQR Technical Manual,* if a project would add population to an area, demand for existing publicly accessible open space facilities would typically increase. Indirect effects on publicly accessible open space resources may occur when the population generated by a proposed project would be sufficiently large to noticeably diminish the ability of an area's open space to serve the future population. An open space assessment is typically warranted if an action would directly affect an open space or if it would increase the population by more than 200 residents or 500 nonresidents.

The Proposed Action is a citywide action that will result in development that may have direct or indirect effects on open space. Consistent with the Analytical Framework described above, the EIS will consider the Proposed Action's potential to adversely affect open space resources by assessing prototypical sites, where applicable.

TASK 6. SHADOWS

A shadows analysis assesses whether new structures resulting from a proposed action would cast shadows on sunlight-sensitive publicly accessible resources or other resources of concern, such as natural resources, and to assess the significance of their impact. Generally, the potential for shadow impacts exists if an action would result in new structures or additions to buildings resulting in structures over 50 feet in height that could cast shadows on important natural features, publicly accessible open space, or on

significant historic features that are dependent on sunlight. New construction or building additions resulting in incremental height changes of less than 50 feet can also potentially result in shadow impacts if they are located adjacent to, or across the street from, a sunlight-sensitive resource.

It is not possible to evaluate the impacts of any specific development, as the specific location of future development projects is unknown. Therefore, a shadow assessment, using a prototypical development scenario, will be provided to determine how project-generated shadows would affect sunlight-sensitive resources.

The shadows analysis will include the following tasks:

- A preliminary screening assessment will be prepared to determine whether shadows from a prototypical site may potentially reach any sunlight-sensitive resources at any time of year;
- A Tier 1 Screening Assessment will be conducted to determine the longest shadow study area for the potential developments, which is defined as 4.3 times the height of a structure (the longest shadow that would occur on December 21st, the winter solstice). A base map that illustrates the locations of the potential developments in relation to the sunlight-sensitive resources will be developed;
- A Tier 2 Screening Assessment will be conducted if any portion of a sunlight-sensitive resource lies within the longest shadow study area. The Tier 2 assessment will determine the triangular area that cannot be shaded by the projected and potential developments, which in New York City is the area that lies between -108 and +108 degrees from true north;
- If any portion of a sunlight-sensitive resource is within the area that could be potentially shaded by the potential developments, a Tier 3 Screening Assessment will be conducted. The Tier 3 Screening Assessment will determine if shadows resulting from the prototypical site can reach a sunlight-sensitive resource using three-dimensional computer modeling software with the capacity to accurately calculate shadow patterns. The model will include a three-dimensional representation of the sunlight-sensitive resource(s) and the prototypical sites to determine the extent and duration of new shadows that could be cast on sunlight-sensitive resources as a result of the Proposed Action;
- If the screening analysis does not rule out the possibility that action-generated shadows would reach any sunlight-sensitive resources, a detailed analysis of potential shadow impacts on publicly accessible open spaces or sunlight-sensitive historic resources resulting from development will be provided in the EIS. The detailed shadow analysis will establish a baseline condition (No-Action), which will be compared with the With-Action condition to illustrate the shadows cast by existing or future buildings and distinguish the additional (incremental) shadow cast by the prototypical sites. The detailed analysis will include the following:
    - A summary table listing the entry and exit times and total duration of incremental shadow on each applicable representative day for each affected resource.
    - An assessment of the significance of any shadow impacts on sunlight-sensitive resources.
    - If potential significant adverse impacts are identified, the amount of remaining sunlight on those sensitive resources, as well as the types of vegetation and or recreational activities involved, will be considered.

TASK 7. HISTORIC AND CULTURAL RESOURCES

Historic and cultural resources include both architectural and archaeological resources. Such resources are identified as districts, buildings, structures, sites, and objects of historical, aesthetic, cultural, and archaeological importance. Historic resources include designated New York City Landmarks (NYCLs) and Historic Districts (NYCHDs); properties calendared for consideration as NYCLs by the Landmarks Preservation Commission (LPC) or determined eligible for NYCL designation; properties listed on the State and National Register of Historic Places (S/NR) or formally determined eligible for S/NR listing, or properties contained within a S/NR listed or eligible district; properties recommended by the New York State board for listing on the S/NR; and National Historic Landmarks (NHLs).

In conformance to *CEQR Technical Manual* guidance, a historic and cultural resources assessment is required if a project would have the potential to affect either archaeological or architectural resources.

The Proposed Action could result in new in-ground disturbance. Although it is not possible to evaluate the impacts of any specific development, as the specific location of future development projects is unknown, the historic and cultural resources assessment will analyze the potential for significant adverse impacts based on prototypical sites.

Identified resources will be considered and assessed in the EIS, as applicable in consultation with LPC/OPRHP, including the following tasks:

- Consultation with LPC/OPRHP regarding the potential architectural and archaeological sensitivity of the prototypical sites. The study area for architectural resources is defined by a 400 feet radius from the boundary of the prototypical site. The study area for archaeological resources is the area of subsurface work for the potential development;
- Map and briefly identify any known architectural resources within the study area;
- Identify potential architectural resources in consultation with LPC/OPRHP; and
- Evaluate the potential for the Proposed Action to result in direct, physical effects on any identified architectural and archaeological resources. Assess the potential for the Proposed Action to result in any visual and contextual impacts on architectural resources. Potential effects will be evaluated through a comparison of the No-Action condition and the With-Action condition.

TASK 8. URBAN DESIGN AND VISUAL RESOURCES

Urban design is the totality of components that may affect a pedestrian's experience of public space. An assessment of urban design and visual resources is appropriate when there is the potential for a pedestrian to observe, from the street level, a physical alteration beyond that allowed by existing zoning. When an action would potentially obstruct view corridors, compete with icons in the skyline, or would facilitate substantial alterations to the streetscape of the neighborhood by noticeably changing the scale of buildings, a more detailed analysis of urban design and visual resources would be appropriate.

It is not possible to evaluate the impacts of any specific development, as the specific location of future development projects is unknown. Consistent with the Analytical Framework described above, the EIS will consider the Proposed Action's potential to adversely affect urban design and visual resources by assessing prototypical sites.

The urban design study area will be the same as that used for the land use assessment. For visual resources, the view corridors within the study area from which such resources are publicly viewable will be identified. The preliminary assessment will consist of the following tasks:

- The urban design and visual resources of the potentially affected area and adjacent study area will be described using text, photographs, and other graphic material, as necessary, to identify critical features, use, bulk, form, and scale;

- In coordination with Task 2, “Land Use, Zoning, Public Policy,” the changes expected in the urban design and visual character of the study area due to known development projects in the future No-Action condition will be described; and
- Potential changes that could occur in the urban design character of the study area due to the Proposed Action will be described. For the prototypical site, the analysis will focus on the general massing assumed for the potential development, as well as elements such as street wall height, setback, and building envelope.

If warranted based on the results of the preliminary assessment, a detailed urban design and visual resources analysis will be prepared for the worst-case With-Action Scenario. The analysis would describe the potential changes that could occur to urban design and visual resources in the future With-Action condition, in comparison to the future No-Action condition, focusing on the changes that could negatively affect a pedestrian’s experience of the area.

TASK 9. NATURAL RESOURCES

Under CEQR, a natural resource is defined as the City’s biodiversity (plants, wildlife, and other organisms); any aquatic or terrestrial areas capable of providing suitable habitat to sustain the life processes of plants, wildlife, and other organisms; and any areas capable of functioning in support of the ecological systems that maintain the City’s environmental stability. Such resources include ground water, soils, and geologic features; numerous types of natural and human-created aquatic and terrestrial habitats (including wetlands, dunes, beaches, grasslands, woodlands, landscaped areas, gardens, parks, and built structures); as well as any areas used by wildlife. The EIS will include an assessment of natural resources following CEQR guidelines.

Since it is not possible to evaluate the impacts of any specific development as the specific location of future development projects is unknown, the natural resources assessment will be based on prototypical sites. The future conditions for the natural resources within potential sites in the No-Action condition will be described in the EIS as the baseline condition. The potential effects of the Proposed Action on natural resources, in comparison with the No-Action condition, will be assessed.

TASK 10. HAZARDOUS MATERIALS

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

Consistent with the Analytical Framework described above, the EIS will consider the Proposed Action’s potential to result in adverse impacts related to hazardous materials by assessing prototypical sites.

TASK 11. WATER AND SEWER INFRASTRUCTURE

The water and sewer infrastructure assessment determines whether a proposed action may adversely affect the City’s water distribution or sewer systems and, if so, assess the effects of such actions to

determine whether their impact is significant. The *CEQR Technical Manual* outlines thresholds for analysis of an action's water demand and its generation of wastewater and stormwater.

Consistent with the Analytical Framework described above, the EIS will consider the Proposed Action's potential to adversely affect the City's water and sewer infrastructure by assessing prototypical sites.

Water Supply

A preliminary analysis of water supply infrastructure is needed if the project would result in an exceptionally large demand for water or if it is in an area that experiences low water pressure. If the project does not meet any of these thresholds, no further analysis of water supply infrastructure is needed.

Wastewater and Stormwater Infrastructure

The threshold of a preliminary wastewater and stormwater infrastructure analysis for projects in New York City that are in areas that have a combined or separate storm and sanitary sewer systems varies based on the incremental development over the No-Action condition and the existing zoning district(s) that a project site is located.

A more detailed assessment may be required if increased sanitary or stormwater discharges from a proposed project are predicted to affect the capacity of portions of the existing sewer system, exacerbate combined sewer overflow (CSO) volumes/frequencies, or contribute greater pollutant loadings in stormwater discharged to receiving water bodies. The scope of a more detailed analysis, if necessary, will be developed based on conclusions from the preliminary infrastructure assessment and coordinated with the lead agency and DEP.

TASK 12. SOLID WASTE AND SANITATION SERVICES

The objective of a solid waste assessment is to determine whether a project has the potential to cause a substantial increase in solid waste production that may overburden available waste management capacity or otherwise be inconsistent with the City's Solid Waste Management Plan (SWMP) or with State policy related to the City's integrated solid waste management system. According to the *CEQR Technical Manual*, if a project's generation of solid waste in the With-Action condition would not exceed 50 tons per week, it may be assumed that there would be sufficient public or private carting and transfer station capacity in the metropolitan area to absorb the increment, and further analysis generally would not be required. This EIS will provide a preliminary screening assessment of the Proposed Action's potential to affect solid waste and sanitation services. If warranted, a more detailed analysis will be provided. The assessment will be based on prototypical sites, since the specific locations of future development projects are unknown.

TASK 13: ENERGY

Analysis of energy focuses on a project's consumption of energy and, where relevant, potential effects on the transmission of energy that may result from the project. The assessment is of the energy sources typically used in a project's operation (e.g., HVAC, lighting) and includes electricity, fossil fuels (e.g., oils, coal, gas), nuclear power, hydroelectric power, and occasionally miscellaneous fuels like wood, solid waste, or other combustible materials. All new structures requiring heating and cooling are subject to the New York City Energy Conservation Code, which reflects state and city energy policy. Estimated energy use by the Proposed Project will be noted. If applicable, a screening-level assessment will be prepared, including an estimate of the additional energy consumption associated with the Proposed Action, including an estimate of the demand load on electricity, gas, and other energy sources, and an assessment of available supply.

Although significant adverse impacts are not anticipated for the Proposed Action, the EIS will include a preliminary screening analysis based on prototypical sites to consider projected operational energy consumption, and will include an estimate of energy consumption associated with the proposed actions.

TASK 14. TRANSPORTATION

The objective of a transportation analysis is to determine whether a proposed action may have a potential significant impact on traffic operations and mobility, public transportation facilities and services, pedestrian elements and flow, the safety of all roadway users (pedestrians, bicyclists, and motorists), and on and off-street parking. The Proposed Action would facilitate potential developments that would generate vehicular travel and demand for parking, as well as transit riders and pedestrian traffic. This development would be analyzed based on prototypical assessment. The assessment would compare prototypical development to Table 16-1 in the *CEQR Technical Manual*, and the Level 1 and/or 2 screening assessments described below would be conducted if the incremental development levels in Table 16-1 are exceeded.

Travel Demand and Screening Assessment

The *CEQR Technical Manual* outlines a two-tiered screening process to identify the need for detailed transportation analyses. The Level 1 screening assessment includes a trip generation analysis to determine whether the Proposed Project would result in more than 50 vehicle trips, 200 subway/rail or bus riders, or 200 pedestrian trips in a peak hour. The Level 2 screening includes an assignment of trips to the roadway network to identify intersections with 50 or more vehicle trips, pedestrian elements with 200 or more pedestrian trips, 50 bus trips in a single direction on a single route, or 200 passengers at a subway station or line during any analysis peak hour which would require detailed analyses. The CEQR assessment and the screening trip thresholds are based on the incremental differences between the No-Action condition and the With-Action condition.

Traffic

According to the criteria specified in the *CEQR Technical Manual,* detailed traffic analyses are generally required at intersections where more than 50 new vehicle trips would be generated by a proposed project during an individual peak hour based on the results of the vehicle trip assignment. Consistent with the Analytical Framework described above, the EIS will consider the Proposed Action's potential to adversely affect traffic conditions by assessing prototypical sites.

Transit

Detailed transit analyses are generally required at subway stations or lines where more than 200 new passengers would be added by a proposed project during an individual peak hour based on the results of the transit trip assignment and at bus lines where 50 new passengers would be added in a single direction on a single route. Consistent with the Analytical Framework described above, the EIS will consider the Proposed Action's potential to adversely affect transit conditions by assessing prototypical sites.

Pedestrians

According to the criteria specified in the *CEQR Technical Manual,* detailed pedestrian analyses are generally required at pedestrian elements (sidewalk, crosswalk, or intersection corner) where more than 200 new pedestrians would be added by a proposed project during an individual peak hour based on the results of the pedestrian trip assignment. Consistent with the Analytical Framework described above, the EIS will consider the Proposed Action's potential to adversely affect pedestrian conditions by assessing prototypical sites.

Parking Conditions

A parking analysis identifies the extent to which on-street and off-street parking is available and utilized under existing, No-Action, and With-Action conditions. Typically, this analysis encompasses a study area within 0.25-mile of a proposed project. If the analysis identifies a shortfall in parking in the 0.25-mile study area, the study area could be extended to 0.5 miles to identify additional parking supply. The analysis, which takes into consideration anticipated changes in area parking supply, provides a comparison of parking needs versus availability to determine if a parking shortfall is likely to result from additional demand generated by potential developments facilitated by the Proposed Action. Consistent with the Analytical Framework described above, the EIS will consider the Proposed Action's potential to adversely affect parking conditions by assessing prototypical sites.

Vehicular and Pedestrian Safety Assessment

An evaluation of traffic safety is necessary for locations within the study area that have been identified as high-crash locations. A high-crash location is defined as a location identified along a Vision Zero high-priority corridor and/or intersection or with five or more pedestrian/bicycle injury crashes that occur during any consecutive 12 months of the most recent three-year period for which data is available. Crash histories will be obtained and reviewed to determine whether projected vehicular and pedestrian traffic would further impact safety at these locations or whether existing unsafe conditions could adversely impact the flow of the projected new vehicular or pedestrian/bicycle trips. If the assessment identifies potential for significant pedestrian and/or bicycle impacts due to the Proposed Action, possible remedies and/or improvements will be identified. Consistent with the Analytical Framework described above, the EIS will consider the Proposed Action's potential to adversely affect vehicular and pedestrian safety by assessing prototypical sites.

TASK 15. AIR QUALITY

In conformance with *CEQR Technical Manual* guidelines, assessments will be completed of the impact of mobile sources generated by the Proposed Project, emissions from stationary source Heating, Ventilation and Air Conditioning (HVAC) facilities as part of potential developments facilitated by the Proposed Action, and emissions from on-site parking facilities. In addition, assessments will be completed of the potential impact of nearby major sources of air pollution and air toxics on sensitive populations introduced by the potential developments.

Consistent with the Analytical Framework described above, the EIS will consider the Proposed Action's potential to adversely affect air quality by assessing prototypical sites.

TASK 16. GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Greenhouse Gas Emissions

Increased concentrations of greenhouse gases (GHGs) are changing the global climate, which is predicted to lead to wide-ranging effects on the environment, including rising sea levels, increases in temperature, and changes in precipitation levels. Although this is occurring on a global scale, the environmental effects of climate change are also likely to be felt at the local level. Through *PlaNYC*, New York City's long-term sustainability program, the City advances sustainability initiatives and goals for both greatly reducing GHG emissions and increasing the City's resilience to the effects of climate change. GHG emissions generated by the Proposed Action will be quantified and an assessment of consistency with the City's established GHG reduction goal will be performed as part of the EIS in accordance with the *CEQR Technical Manual*.

The EIS will include a preliminary screening assessment of greenhouse gas emissions, and, if warranted, a more detailed analysis will be provided. Prototypical sites will guide this assessment, as it is not possible

to evaluate the impacts of any specific development, as specific locations of future development projects are unknown.

TASK 17. NOISE

A noise analysis is appropriate if a project has the potential to result in significant noise impacts due to the generation of motor vehicles or on-site stationary sources of noise, and if new noise sensitive receptors are introduced in a location of existing high ambient noise levels. Since the Proposed Action would facilitate potential development on sites that could be located in areas of existing high ambient noise levels, including noise from nearby rail operations, a noise analysis will be completed and included in the EIS in accordance with the *CEQR Technical Manual*.

Consistent with the Analytical Framework described above, the EIS will consider the Proposed Action's potential to adversely affect noise by assessing prototypical sites.

TASK 18. PUBLIC HEALTH

Public health is the organized effort of society to protect and improve the health and well-being of the population through monitoring; assessment and surveillance; health promotion; prevention of disease, injury, disorder, disability, and premature death; and reducing inequalities in health status. A public health assessment may be warranted if an unmitigated significant adverse impact is identified in other *CEQR* technical areas, such as natural resources, hazardous materials, air quality, noise, water and sewer infrastructure, or construction. If unmitigated significant adverse impacts are identified for the Proposed Action in any of these technical areas such that a public health assessment is warranted, an assessment will be completed to determine if the Proposed Action would result in a significant adverse impact on public health.

Consistent with the Analytical Framework described above, the EIS will consider the Proposed Action's potential to adversely affect public health by assessing prototypical sites.

TASK 19. NEIGHBORHOOD CHARACTER

Neighborhood character is an amalgam of various elements that give neighborhoods their distinct "personality." These elements may include a neighborhood's land use, zoning, and public policy; socioeconomic conditions; community facilities; open space; shadows; urban design and visual resources; historic and cultural resources; transportation; and/or noise. Each of these technical areas are considered in separate chapters in this EIS. The Proposed Action has the potential to alter one or more of these elements that contribute to the area's character. Therefore, a neighborhood character analysis will be provided in the EIS.

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

- Identify the defining features of the existing neighborhood character;
- Summarize changes in the character of the neighborhood that can be expected in the future With-Action condition and compare to the future No-Action condition; and

- Evaluate whether the Proposed Action has the potential to affect these defining features, either through the potential for a significant adverse impact or a combination of moderate effects in the relevant technical areas.

If the preliminary assessment determines that the Proposed Action could affect the defining features of neighborhood character, a detailed analysis will be conducted in accordance with the *CEQR Technical Manual* guidelines. This assessment will be guided by a prototypical analysis.

TASK 20. CONSTRUCTION

Construction impacts, though temporary, can have a disruptive and noticeable effect on the adjacent community, as well as people passing through the area. Construction impacts are usually important when construction activity has the potential to affect transportation conditions, archaeological resources and the integrity of historic resources, community noise levels, air quality conditions, and mitigation of hazardous materials.

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

TASK 21. DISADVANTAGED COMMUNITIES

Effective December 30, 2024, Section 8-0109(2)(k) of the New York Environmental Conservation Law requires that EISs include a statement of the effects of the Proposed Action on disadvantaged communities, including whether the action may cause or increase a disproportionate pollution burden. On January 29, 2025, the New York State Department of Environmental Conservation (NYSDEC) proposed a rule that provides additional considerations regarding this new statutory provision[11]. However, the 2021 CEQR Technical Manual does not provide guidance regarding the scope of this analysis. The InfoLocator application maintained by NYSDEC maps the boundaries of Disadvantaged Communities (DAC) in New York State. The EIS will disclose whether the Project Area is in or near a DAC. The EIS will also include a statement on the potential, project-generated disproportionate pollution burden on disadvantaged communities. The findings of the relevant CEQR analyses will be included in this chapter to assist with the determination as to whether the Proposed Actions may result in disproportionate pollution burden affecting DACs.

TASK 22. MITIGATION

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

TASK 23. ALTERNATIVES

[11] https://dec.ny.gov/regulatory/regulations/proposed-emergency-recently-adopted-regulations/state-environmental-quality-review-act-regulatory-revisions

The purpose of an alternative analysis is to examine development options that would tend to reduce action-related impacts. The alternatives will be better defined once the full extent of the Proposed Action's impacts have been identified. The chapter will include a No Action Alternative and a No Unmitigated Impact Alternative. Additional alternatives may be identified in consultation with the lead agency. The level of analysis provided will depend on an assessment of project impacts determined by the analysis connected with the appropriate task.

TASK 24: CONCEPTUAL ANALYSIS

Under the State Environmental Quality Review Act (SEQRA), a conceptual analysis is warranted if a Proposed Action creates new discretionary actions that are broadly applicable even when projects seeking those actions will trigger a future, separate environmental review. It is the lead agency's responsibility to consider all possible environmental impact of the new discretionary actions at the time it creates them. The Proposed Actions would create a new Special Permit for the City Planning Commission to consider. A Conceptual analysis will be provided to understand how the new discretionary actions could be used in the future and to generically assess the potential environmental impacts that could result. However, all potential significant adverse impacts related to these future discretionary actions would be disclosed through environmental review at the time of the application.

TASK 25. SUMMARY EIS CHAPTERS

The following summary chapters will be prepared in accordance with *CEQR* guidelines:

- *Unavoidable Adverse Impacts,* which summarizes any significant adverse impacts that are unavoidable if the Proposed Action is implemented regardless of the mitigation employed (or if mitigation is not feasible);
- *Growth-Inducing Aspects of the Proposed Action,* which generally refer to "secondary" impacts of the Proposed Action that trigger further development; and
- *Irreversible and Irretrievable Commitments of Resources,* which summarizes the Proposed Action and its impact in terms of the loss of environmental resources (loss of vegetation, use of fossil fuels and materials for construction, etc.), both in the immediate future and in the long-term.

TASK 26. EXECUTIVE SUMMARY

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