

SELF-STORAGE ZONING TEXT AMENDMENT

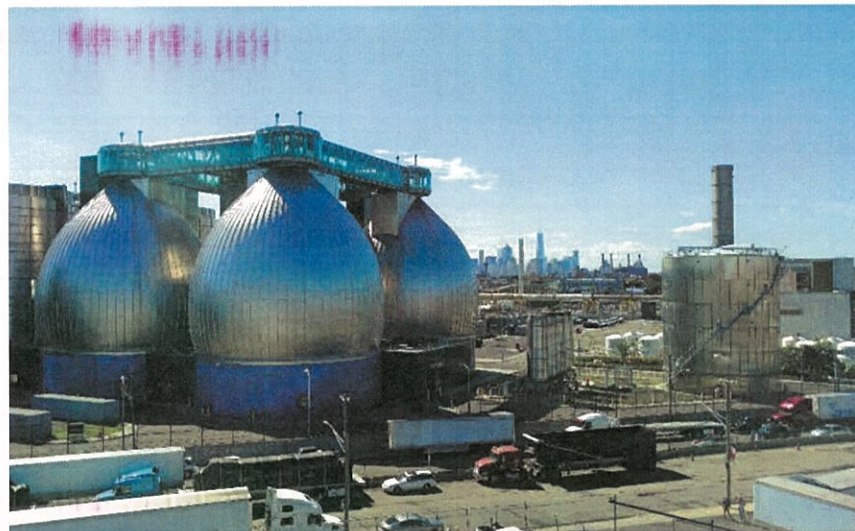
City Council Zoning Subcommittee
November 20th 2017



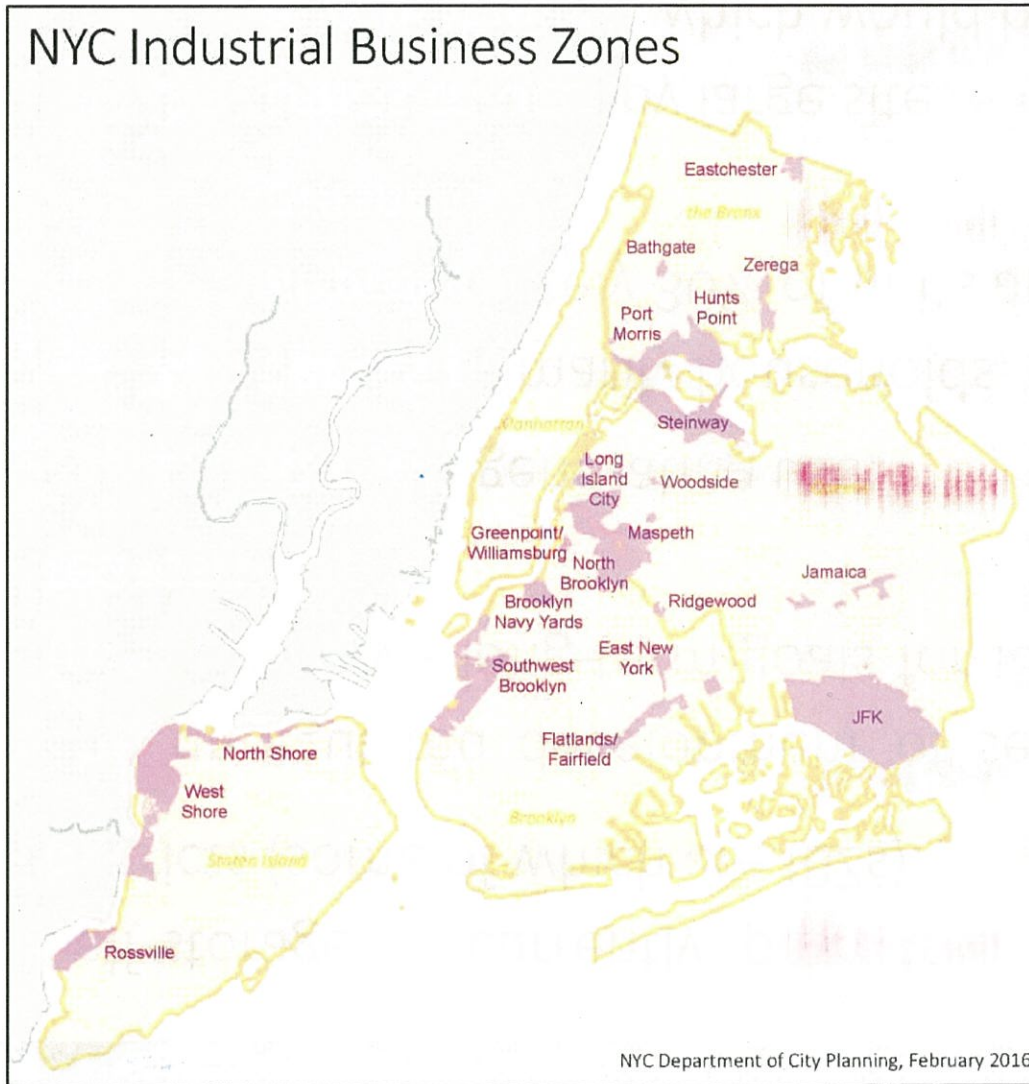
Industrial Action Plan

In November 2015, the Mayor and City Council announced a **10-point Industrial Action Plan** that targets NYC's Industrial Business Zones (IBZs) as areas for employment growth and industrial innovation.

The Industrial Action Plan called for a **limitation on personal storage** in IBZs to support **job creation and economic growth**. It also called for the creation of a **hotel Special Permit** within IBZs, and confirmed that the Administration would not support private applications for residential rezonings within IBZs.



Industrial Business Zones



Industrial Business Zones are NYC's most active industrial areas:

- over 68% industrial-sector employment;
- critical for a range of industries: wholesale trade, transportation & warehousing, manufacturing and construction;
- since 2010, industrial employment is growing in IBZs.

The Industrial Action Plan builds on a series of existing policies (tax incentives, service provision, etc.) that support economic growth and industrial businesses in IBZs.

Self-storage

Self-storage is currently permitted in C8 and all M districts (some of which are IBZs).

The unregulated development of self-storage detracts from the City's long-term goals for IBZs, for three main reasons:

1. low job-generating use;
2. serves primarily households, although approximately 30% of units are leased by small businesses;
3. tends to occupy large sites along truck routes and highways, which would be optimal sites for industrial, more job-intensive businesses.



Process (Non-ULURP)

- May 22, 2017: the original proposal was referred to Community Boards, Borough Presidents, and Borough Boards.
- August 3, 2017: Department of City Planning filed a modified application (A-text), proposing an as-of-right framework where new self-storage development would be tied to the creation of new industrial space.
- August 23, 2017: City Planning Commission held a public hearing concerning both the original proposal and the modified application.
- November 1, 2017: City Planning Commission adopted the modified application with additional changes.

Proposal as adopted by the City Planning Commission



In response to concerns voiced during public review and the results of the DEIS, the CPC adopted the following proposal:

- New self-storage **on large lots** may be constructed as-of-right as long as it includes a substantial amount of industrial space.
- New self-storage **on small lots** may be constructed as-of-right as long as it includes a large percentage of large self-storage units, which are generally used by small businesses.
- A **BSA Special Permit** would be required to modify or waive the industrial space requirement.
- **Existing self storage** facilities would be **grandfathered** and would be considered **conforming**.

Large lot conditional as-of-right option

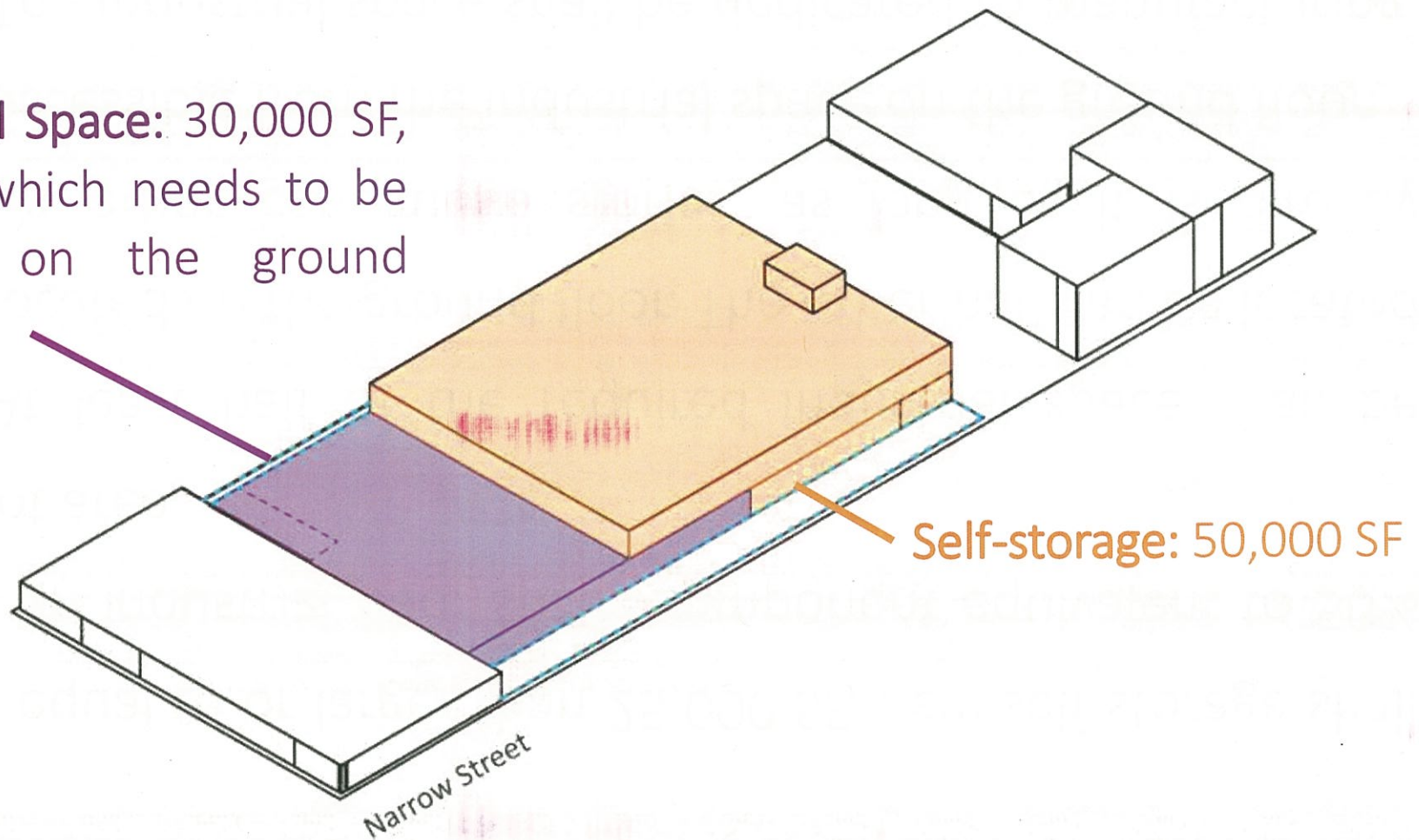
On lots equal to or larger than 25,000 SF, new self-storage shall include an industrial floor space component equivalent to 50% of the lot area.

- At least half of the required industrial space shall be located on the ground floor. The other half can be located on other contiguous stories, as long as it is directly accessible from the industrial space on the ground floor.
- The industrial space shall be dedicated to manufacturing, semi-industrial or industrial uses, art, photo or motion picture production studios.

Illustration of conditional as-of-right option

M1-1 District, on 60,000 SF lot

Industrial Space: 30,000 SF,
half of which needs to be
located on the ground
floor.



Other provisions applicable to large lots

- Reduction of the off-street parking and loading dock requirements, to increase the feasibility of mixed-use building.
- In M1-1 districts, an allowance for the required industrial floor space to exceed the 1.0 FAR cap, limited to an excess of 20,000 SF of the 1.0 FAR, to increase the feasibility of mixed-use building in M1-1 districts.
- Specifications for the ceiling heights of the industrial floor space (15 ft.)

Small lot conditional as-of-right option



On lots smaller than 25,000 SF, new self-storage may either:

- a) apply the same option that exists for large lots; or
- b) provide floor area equivalent to 50% of the lot area in the form of large self-storage units (100 sf or more), because units of these sizes are typically rented by businesses.

By BSA Special Permit

A BSA Special Permit would be required to modify or waive the industrial floor space requirement.

The BSA would need to find that the required industrial floor space creates financial hardship, with no reasonable possibility that a self-storage facility with the required industrial floor area would bring a reasonable return.

Significance of Proposal before Council

- Findings are not open to multiple interpretations and relate to financial feasibility.
- Creation of new industrial space is a condition of new self-storage development.
- Potential of creating meaningful amounts of industrial space: based on typical self-storage lots, the industrial set-aside would measure between 12,500 SF and 45,000 SF on each lot where self-storage is built.
- Reduced impacts on the self-storage industry and the small businesses and households that rely on self-storage.
- Reduced possibility of shifting self-storage development to M and C8 districts outside of IBZs, which are often closer to residential areas.

Significance of Proposal before Council



- Small sites alternative is included, which is responsive to small businesses' use of self-storage.
- Industrial floor space is permitted several stories, which provides more flexibility, allows both uses to function on the ground floor, improves feasibility for self-storage developers and affordability for industrial businesses.
- Relatively wide range of uses for industrial floor space facilitates the ability to find tenants for self-storage operators.
- Other zoning changes to parking, loading and permitted FAR facilitate the construction of a mixed use self-storage/industrial building.

Original Proposal – as referred



A CPC Special Permit was proposed for the development of self-storage in Designated Areas in M districts, which closely align with IBZs. A case-by-case, site-specific review process would ensure that self-storage development does not represent a significant lost opportunity for the future siting of a more job-intensive industrial business.

CPC Special Permit findings would include:

- zoning lot size
- lot or building configuration
- proximity to truck routes
- capacity of local streets providing access to zoning lot
- investment in comparable sites in the vicinity, etc.

Questions?



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TESTIMONY OF CONGRESSWOMAN CAROLYN B. MALONEY

Council of the City of New York

Land Use Committee, Subcommittee on Zoning and Franchises

Public Hearing

Council Chambers, City Hall

New York, NY 10007

November 20, 2017

I am pleased to thank the Subcommittee on Zoning and Franchises for allowing me to present testimony today. I strongly support the East River Fifties Alliance's Text Amendment (N180082 ZRM) to the Zoning Resolution of the City of New York and ask that the City Council vote to approve the proposed rezoning, but without the modification made by the City Planning Commission on November 15, 2017.

The area of Manhattan Community District 6 (CD 6) east of First Avenue and north of East 51st Street is the only area of Manhattan where R10 zoning—which allows buildings to have a floor area ratio of 10.0, or even 12.0 if certain allotments for inclusionary housing are met, applies on side streets. This area is a low- and mid-rise, residential community, yet current zoning law enables supertall buildings to be constructed with no regard for context or for potential impacts on the neighborhood.

Recent advances in architecture and engineering have made it easier than ever thought possible to construct supertall buildings in excess of 700 feet tall.ⁱ With the zoning regulations currently governing construction in the relevant area of CD 6, there is nothing preventing the proliferation of soaring towers. These buildings either end up being apartment-sized bank accounts for wealthy absentee owners and private equity funds, or they create an influx of residents that overwhelm the local infrastructure, overcrowding schools, transportation, and parks.ⁱⁱ

Overdevelopment poses a threat to the character of this low- and mid-rise community as a result of its current R10 zoning. Supertalls would block nearby residents' light and air and overshadow all low-rise buildings in the immediate vicinity. Additionally, it is inappropriate to allow huge towers to be built in the middle of residential blocks. Traditionally, and for good reason, taller buildings have been reserved for avenues, while mid-block buildings are lower in scale.

The proposed text amendment to the Zoning Resolution, which draws inspiration from the city's "tower-on-a-base" (TOB) development rules, would be far more suitable for the East River Fifties area. The rezoning proposal would require that new buildings be constructed with at least 45% of their total floor area located in stories either partially or entirely below a height of 150 feet. It will prevent the kind of out-of-scale development that is possible under the current R10.

zoning and block the construction of midblock supertalls. TOB packing rules will also ensure the construction of buildings with appropriate heights and contextual street walls.

In short, the zoning regulations currently affecting the relevant area of CD 6 include serious oversights that jeopardize the neighborhood's character, many of which the proposed text amendment would successfully remedy.

However, the value of this proposed rezoning would be undermined if the City Council were to approve the modification added by the City Planning Commission. This provision would authorize projects that have not yet completed their foundations to proceed with construction pursuant to the zoning regulations currently in place, and thus would undermine the very purpose for which this zoning change is being made: the prevention of supertall structures in a residential community. Changing the zoning but allowing a non-contextual building to go up would be bad precedent; there is a reason for the traditional rule that foundations must be complete. There is no rationale for making an exception here when the City Planning Commission has acknowledged that the building in question is totally out of scale for its location.

At a putative 67 stories and 800 feet tall, this tower would be the tallest building on the Upper East Side. In fact, its 800-foot height would be roughly equivalent to an 80-story building. This building would dwarf its neighbors in the Sutton Place area and would alter the neighborhood's historic character as a community with brownstones and low- to mid-rise apartment buildings. The construction of such an out-of-place supertall would be a result of precisely the kind of zoning oversight that the proposed text amendment is meant to correct.

Under normal circumstances, a building permit lapses if its foundation has not yet been completed by the date of enactment of a change in applicable zoning. Given that the building's foundation has not yet been completed, it defies reason that the City would go out of its way to rubber-stamp this out-of-scale development at the same time that it approves a proposal to rezone the area to prevent out-of-scale developments. This "grandfather clause" would effectively spot-zone this lot to the benefit of the developer, which filed plans for this tower only in December 2016—by which point the East River Fifties Alliance had already demonstrated the scale of this community's opposition to overdevelopment and support for better zoning regulations. The developer knew this change was coming but failed to get their foundation done.ⁱⁱⁱ

I strongly urge this Committee to approve the proposed text amendment and to turn down the City Planning Commission's added provision. Thank you.

ⁱ Mir M. Ali, "Evolution of Concrete Skyscrapers: from Ingalls to Jin mao," *Electronic Journal of Structural Engineering*, Vol. 1, No. 1 (2001) p. 2-14, <<http://www.ejse.org/Archives/Fulltext/200101/01/20010101.htm>>.

ⁱⁱ Michael Greenberg, "Tenants Under Siege: Inside New York City's Housing Crisis," *The New York Review of Books*, Aug 17, 2017, <<http://www.nybooks.com/articles/2017/08/17/tenants-under-siege-inside-new-york-city-housing-crisis/>>.

ⁱⁱⁱ Oshrat Carmiel, "Norman Foster's 3 Sutton Place Is Manhattan's Next Super-Tall Controversy," *Bloomberg*, Jan 25, 2016, <<https://www.bloomberg.com/news/articles/2016-01-25/manhattan-s-next-super-tall-condo-plan-faces-neighborhood-battle>>.

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**Testimony of State Senator Liz Krueger
Before the New York City Council Subcommittee on Zoning and Franchises
Regarding Land Use Review Application N180082 ZRM
East River Fifties/Sutton Place Text Amendment by the East River Fifties Alliance
November 20, 2017**

Thank you Chairperson Richards, and members of the City Council Subcommittee on Zoning and Franchises, for the opportunity to testify. My name is Liz Krueger and I represent the 28th State Senate District, which includes the Upper East Side and East Midtown areas of Manhattan, and the neighborhood that is the subject of today's hearing. I strongly urge the City Council to approve the proposed text amendment submitted by the East River Fifties Alliance (ERFA), and to remove a clause added by the City Planning Commission that would exempt a single site in the rezoning area from the new zoning provisions.

Along with ERFA, Borough President Gale Brewer, and Council Members Ben Kallos and Dan Garodnick, I am a co-applicant on this rezoning application. This application seeks to preserve the low- and mid-rise residential character of the neighborhood east of First Avenue between 51st and 59th Streets, while providing sufficient flexibility to facilitate reasonable future development. It is supported by Community Board 6 and numerous civic organizations including the Municipal Arts Society, Sutton Area Community, CIVITAS, and Friends of the Upper East Side Historic Districts.

The text amendment would change the height and bulk regulations that apply to new development in R10 zones on the narrow streets east of First Avenue between 51st and 59th Streets. It would require all new buildings in the area to comply with modified tower-on-a-base regulations with street wall, setback, rear yard, and building packing requirements. While the text amendment does not establish absolute height limits, the changes would require at least 45% of allowable bulk to be under 150 feet, leading to much shorter buildings than would be permitted under existing zoning. This would result in squatter buildings that match the existing context of the area. Because the text amendment would prohibit the construction of skinny supertall towers, which tend to be filled with large apartments for the extraordinarily wealthy, a greater number of residential units are likely to be buildings constructed following the rezoning. The application does not change any existing permissible uses, or reduce base or maximum allowable FAR.

ERFA, the community coalition leading this application, represents 45 co-op and condominium boards and individual owners within the rezoning area, and has more than 2,600 individual supporters living in more than 500 buildings. Over the more than two years that I have been working with ERFA and my fellow elected officials on this rezoning effort, I have been extremely impressed by ERFA's professional, thoughtful, and comprehensive approach. While an individual building proposal first brought the area's outdated zoning to the attention of local residents and elected officials, ERFA has always focused on planning for the future of the entire neighborhood. ERFA has been fighting to ensure that new development in the community does not increase displacement pressures on existing residents, increases affordable housing, and creates homes for New Yorkers rather than often-vacant pieds-a-terre.

Through an accident of history, the Sutton Area is the only residential neighborhood in the entire city zoned R10 still subject to standard tower regulations on narrow streets. Every other residential neighborhood zoned R10 has some kind of height limit or contextual protection—either historic district designation, R10A contextual zoning, or tower-on-a-base controls on wide streets. As a result, the Sutton Area is uniquely vulnerable to the development of supertall towers of unlimited height mid-block on narrow side-streets, a building form that was neither contemplated nor architecturally possible when R10 zoning was created in 1961.

Supertall towers do not match the low-and mid-rise residential character of the East 50s, often lead to the displacement of long-time rent regulated residents from the community, and all too frequently are filled with vacant apartments that primarily serve as bank accounts for international real estate investors and LLCs. While the Sutton Area has a reputation among outsiders as an enclave of the wealthy, it is actually a vibrant mixed-income community with many rent regulated tenants and apartment owners who have lived in the neighborhood for decades. The predominant building type in the 50s east of First Avenue is a mid-rise apartment building of 20 floors or less on a large lot; there are also multiple lower-rise residential buildings in of six floors and under. According to the Environmental Assessment Statement for this application, all but eight buildings in the project area are less than 300 feet and only a single building, at 485 feet, exceeds 400 feet. 87% of the buildings are consistent with the city's Quality Housing limits of 210 feet on wide streets and 185 feet on narrow streets.

The text amendment being considered today is the second application submitted by ERFA and the other co-applicants, and is the result of over 18 months of discussion and compromise with the Department of City Planning. I was also a co-applicant on the original application, certified by the City Planning in June 2017, which included height limitations, street wall articulation, a bonus for community facility space, and a higher minimum of affordable housing units than required under the existing 1987 R10 Inclusionary Housing Program. While the other co-applicants and I still support the more far-reaching aims of the first application, we agreed to submit a new application after extensive feedback from the Department of City Planning and the Commission. Despite the more limited nature of the current application, it still promotes the same goals and accomplishes the primary objective of establishing contextual protections for a mid-rise residential community.

However, one change was made to the application by the City Planning Commission that I believe is unnecessary and inappropriate. Following the Commission's hearing last month, the Commission modified the proposed text to add a special vesting provision that will benefit a single property owner and undermine the uniform application of the new rule. I oppose that modification and urge the Council to remove it. As the members of this Committee know, existing law already exempts developers from zoning changes if a building's foundation is completed before the effective date of a zoning change. The Zoning Resolution also provides an opportunity for developers to apply to the Board of Standards and Appeals for authorization to continue a project as originally planned if a building's foundation was started, but not completed, before the effective date of a zoning change. There is simply no reason to create a special exemption for any developer impacted by this rezoning.

The application before you today is the result of more than two years of community organizing, extensive work by urban planners and land use experts, and discussion among residents, elected officials, and city agencies. It establishes contextual protections for a vibrant residential community without limiting reasonable new development, promotes the creation of new housing for New Yorkers, and reduces the displacement pressures on existing residents. I hope this community-driven application, and all of the organizing that went into making it a reality, can serve as a precedent for prudent community-based city planning in other parts of my Senate District and the city.

I thank you for your time and strongly urge the City Council to support this text amendment.



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Gale A. Brewer, Borough President

November 20, 2017

**Testimony of Manhattan Borough President Gale A. Brewer
City Council Subcommittee on Zoning and Franchises
Application N 180042 ZRM- East River Fifties Text Amendment by
the East River Fifties Alliance (ERFA)**

Good morning Chair Richards, Councilmember Kallos, and members of the Subcommittee on Zoning and Franchises.

I am Jim Caras, General Counsel, here on behalf of Manhattan Borough President Gale A. Brewer to speak in support of the application by East River Fifties Alliance, Inc., of which the Borough President is a co-applicant along with New York City Council Members Ben Kallos and Daniel R. Garodnick and New York State Senator Liz Krueger.

As one of the five co-sponsors of this application, we urge the City Council to support and approve this text amendment without the modification by the City Planning Commission (CPC). We believe this application represents an opportunity to provide greater protections for a residential neighborhood that has been left without the tools it needs to compete with a growing desire for luxury towers throughout Manhattan.

Sutton Place is effectively the only residential neighborhood in New York City still subject to an R10 zoning designation without any contextual protections. Virtually all other R10 areas are either mapped R10A with contextual protections, protected by R10 Infill regulations as is the case with Manhattan Community Board 7, located in historic

districts, or are on wide streets and therefore subject to tower-on-a-base regulations.¹

The supertall buildings which this neighborhood is trying to prevent were not contemplated in 1961 when the R10 zoning was adopted. Unforeseen changes in construction techniques have propelled building heights upward, making giant towers feasible on smaller footprints. In the case of the project area in this application, current rules would allow a supertall development that “would exceed the typical neighborhood building height by a factor of more than four.”²

The proposed development that brought the lack of protections for this neighborhood to our attention was originally slated to be a more than 900 foot tall tower on 58th Street -- a narrow street. This was a wakeup call to a residential community in which, according to our Environmental Assessment Statement (EAS) all but 8 buildings are less than 300 feet, and all but 1 are less than 400.

So with much hard work and compromise on the part of the East River Fifties Alliance and feedback from the Department of City Planning, the proposed text amendment would essentially apply modified tower on a base rules to the ten tax blocks bounded by the East River and FDR Drive to the East, East 59th Street to the north, First Avenue to the West and East 51st Street to the South. The accompanying packing, base, and set-back rules would prevent unlimited lot mergers. This would prevent the development of super towers on these mid-blocks and encourage development that is at least not at extreme odds with the existing neighborhood context.

Reasonable controls in residential areas are not without precedent in this part of Manhattan. If you review Zoning Sectional Map 8d, there are numerous areas, midblock portions in particular, that are R8B districts with a maximum building height of 75 feet. Some of these areas (e.g. 48th to 59th streets between First and Third Avenues) are

¹ Project Description, pg. 1, Land Use Application N 180042 ZRM- East River Fifties Text Amendment

² Project Description, pg. 4, Land Use Application N 180042 ZRM- East River Fifties Text Amendment

significantly closer to East Midtown and less fully residential in character than this neighborhood.

One concern that has been raised is the limited number of soft sites identified in the EAS. We have disagreed at times with DCP's criteria for determining vulnerable sites. For instance rent-stabilized buildings are often not identified as vulnerable despite decades of evidence to suggest that market forces make those housing units susceptible to harassment and tenant turnover.

Let me give you one example: In December of 2015, our office, along with other local elected officials, wrote to DCP urging the department to reconsider a proposal for a contextual rezoning of the University Place and Broadway corridors between East 8th Street and East 14th Street, in the wake of an announced out-of-scale development in the neighborhood. DCP took the position that there were no other potential development sites within the area and therefore would not move forward with a rezoning. Unfortunately, since then construction commenced for two additional out-of-scale buildings with plans for more developments within the proposal area. None of those sites were initially identified by DCP.

In the case of the original Bauhaus development that began the push for some reasonable restrictions in the neighborhood we are considering today, reports were that some co-ops were actually negotiating to sell their buildings to developers. Such circumstances would have been unthinkable at any point in time and underscore the need for reasonable neighborhood protections.

We want to emphasize that we still support the more far-reaching aims of our first application (N 170282 ZRM) which included height limitations, street wall articulation, bonus for community facility space and setting a higher minimum of affordable housing units than required under the existing 1987 R10 Inclusionary Housing Program.

That said, we understand that applications often go through adjustments because of feedback during the DCP and CPC review

process. Despite such adjustments to the Plan before you, it accomplishes the primary objective of protecting a residential neighborhood and this community on a more equal footing with similarly situated residential neighborhoods. We believe the compromise plan does reflect the spirit of testimony and feedback we heard through numerous community board meetings and public hearings where the overwhelming majority of those who testified felt that the current zoning in this area was flawed because it provided this neighborhood with no limits against supertall towers.

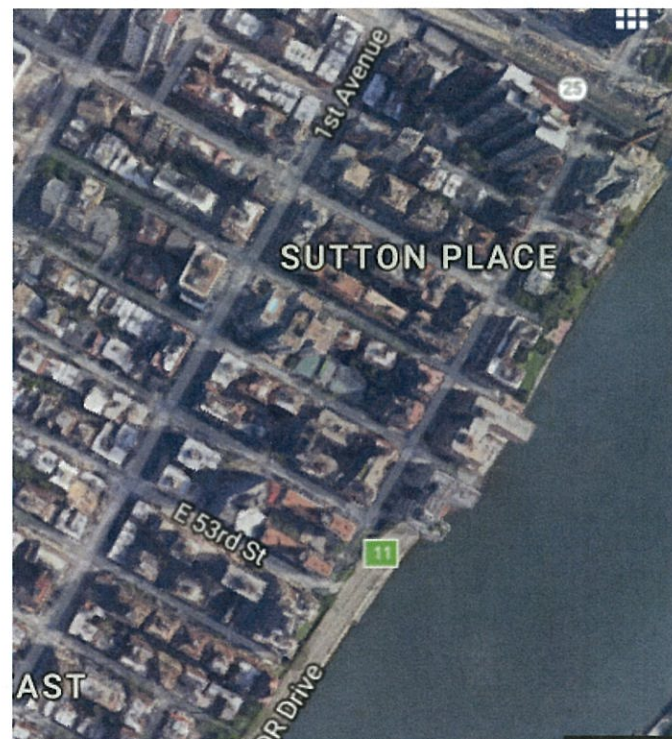
However, there was one last adjustment by the Department in the final days before the City Planning Commission vote that gives us pause. DCP added a grandparenting clause for the development on East 58th Street. We believe that to keep this provision only serves to undermine that which the text amendment is trying to accomplish. Moreover, relief is already available through a zoning mechanism with the Board of Standards and Appeal. Finally, the current developer gained control of this site long after the process resulting in this application was underway. It is overly generous to the developer -- at the expense of the community -- to provide additional relief in the form of this grandparenting provision. We advise the Council to remove it and approve the text amendment.

The Borough President wants to express appreciation to the applicant team; her fellow elected officials; and the 45 buildings represented by co-op boards, condo boards, and individual owners; and over 2600 individual supporters living in more than 500 buildings within and beyond the rezoning area who have been part of our effort to establish a reasonable rezoning framework for this neighborhood.

We thank the City Council for your time and consideration of this proposal, and urge you to approve it.

East River Fifties Text Amendment

Presentation to the
New York City Council
Subcommittee on
Zoning & Franchises
November 20, 2017

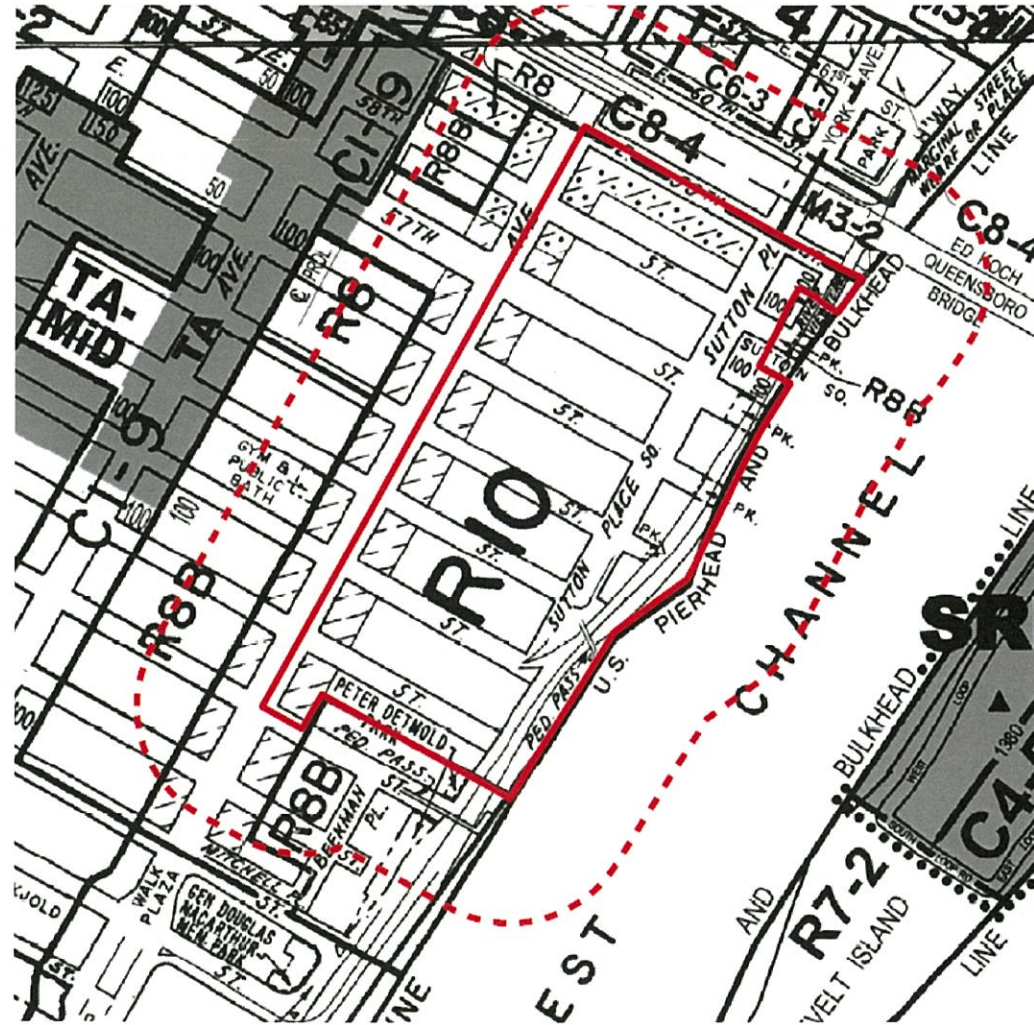


THE APPLICANTS

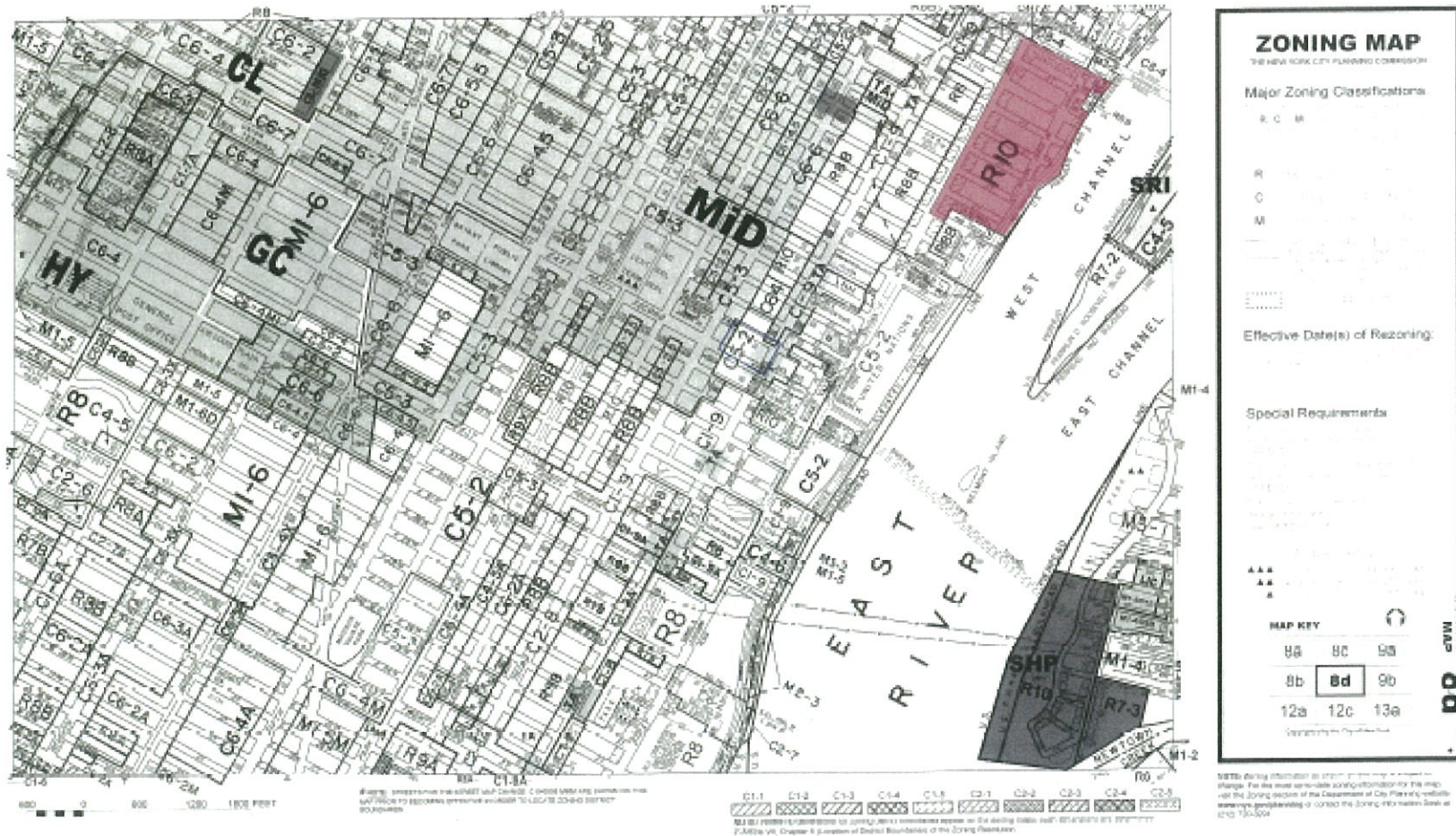
- The East River Fifties Alliance (ERFA)*
- Manhattan Borough President Gale Brewer
- Councilmember Daniel Garodnick
- Councilmember Ben Kallos
- State Senator Liz Krueger

*ERFA is a coalition representing 45 member buildings, civic groups, and over 2600 individual supporters from within and beyond the rezoning area

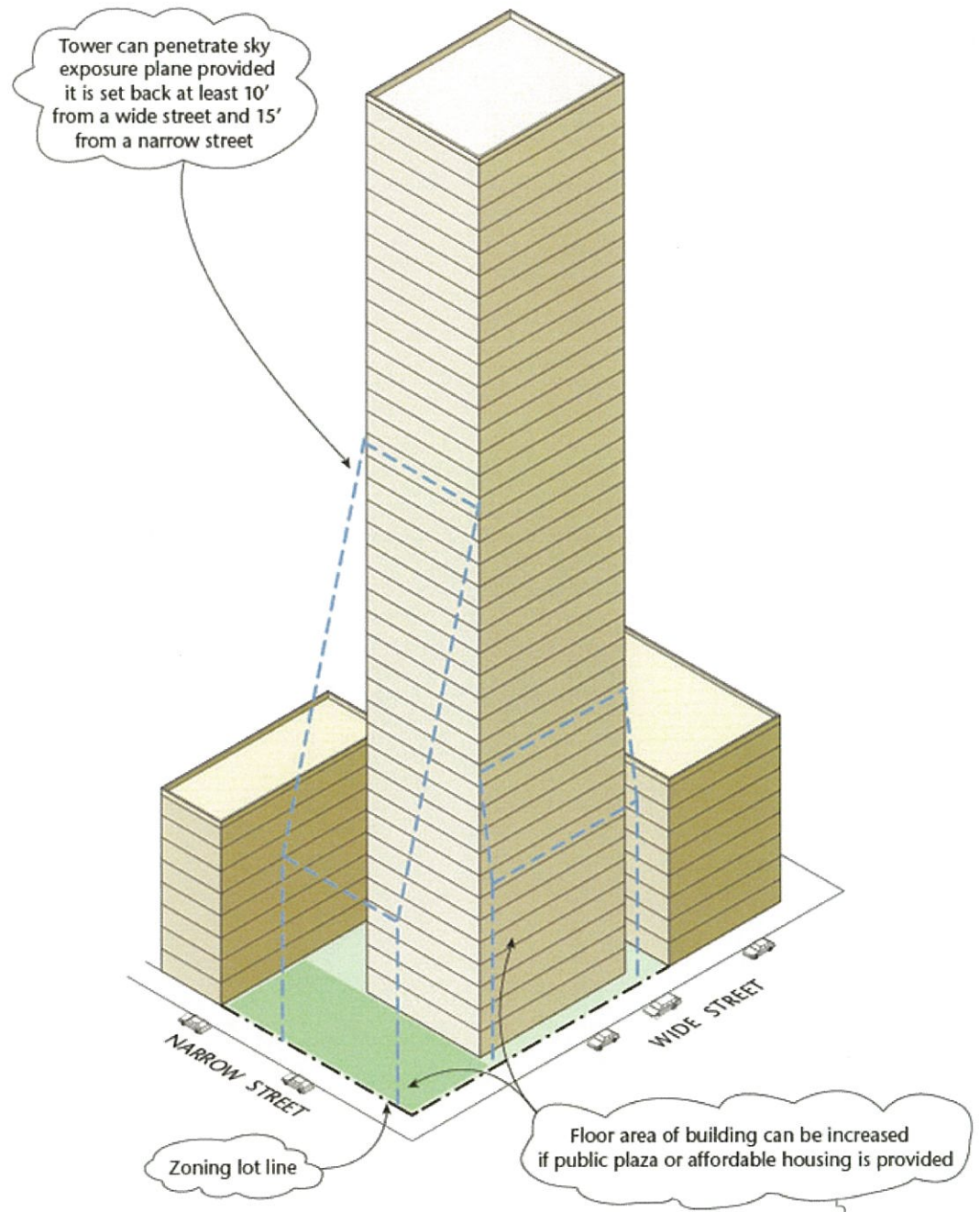
The Project Area



Official Zoning Map



The East River Fifties is the only residential neighborhood still subject to R10 without any type of contextual protections. That zoning allows development of Very tall towers.



RACE TO THE TOP

*Upon completion, the superscrapers will transform Midtown Manhattan.
Here's a look at how they'll stack up*

225 West 57th Street

Height: 1,423 feet.
When completed it will be the tallest residential building in the U.S.

111 West 57th Street

Height: 1,397 feet.
This super-skinny 60-foot-wide tower will be built on the courtyard of the iconic Steinway building.

432 Park Avenue

Height: 1,396 feet.
Upon completion, the building will look down 150 feet at the Empire State Building.

220 Central Park South

Height: 920 feet.
This upcoming tower is designed by Robert A. M. Stern Architects.

157 West 57th Street

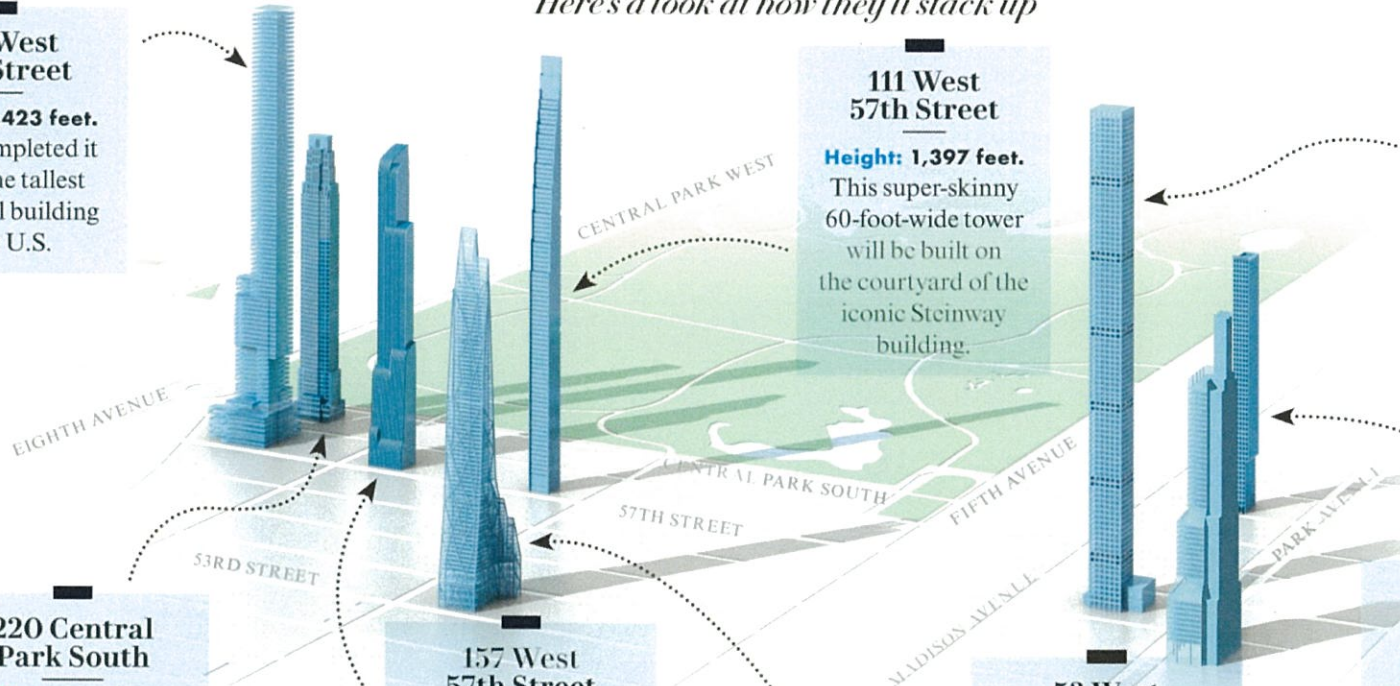
Height: 1,004 feet.
"One57" is the first of these trendsetting buildings to actually break ground and be occupied.

53 West 53rd Street

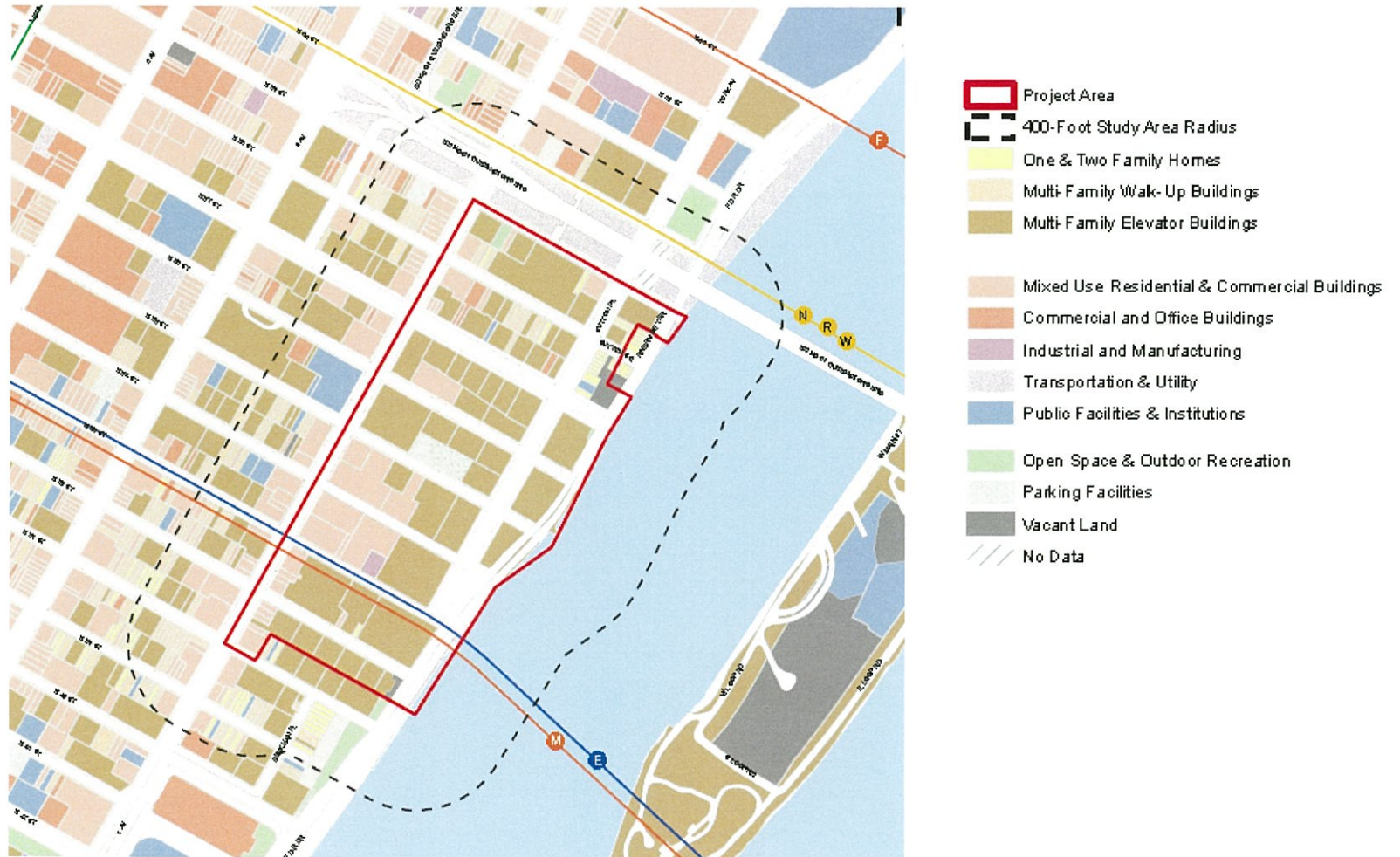
Height: 1,050 feet.
Pritzker Prize laureate Jean Nouvel is behind the tapered modern design.

520 Park Avenue

Height: 700 feet.
The upcoming 31-unit building will be relatively diminutive among its neighbors, at 51 stories.



Existing Context: Residential



Existing Context: mid-rise



Existing Context: mid-rise



Existing Context: low-rise



Existing Context: Hi-rise



Existing Context: Bldg. Heights



The Problem:

- **Existing zoning allows out-of-scale development**

The Solution:

- **Rezone the area appropriately**

Planning Goals:

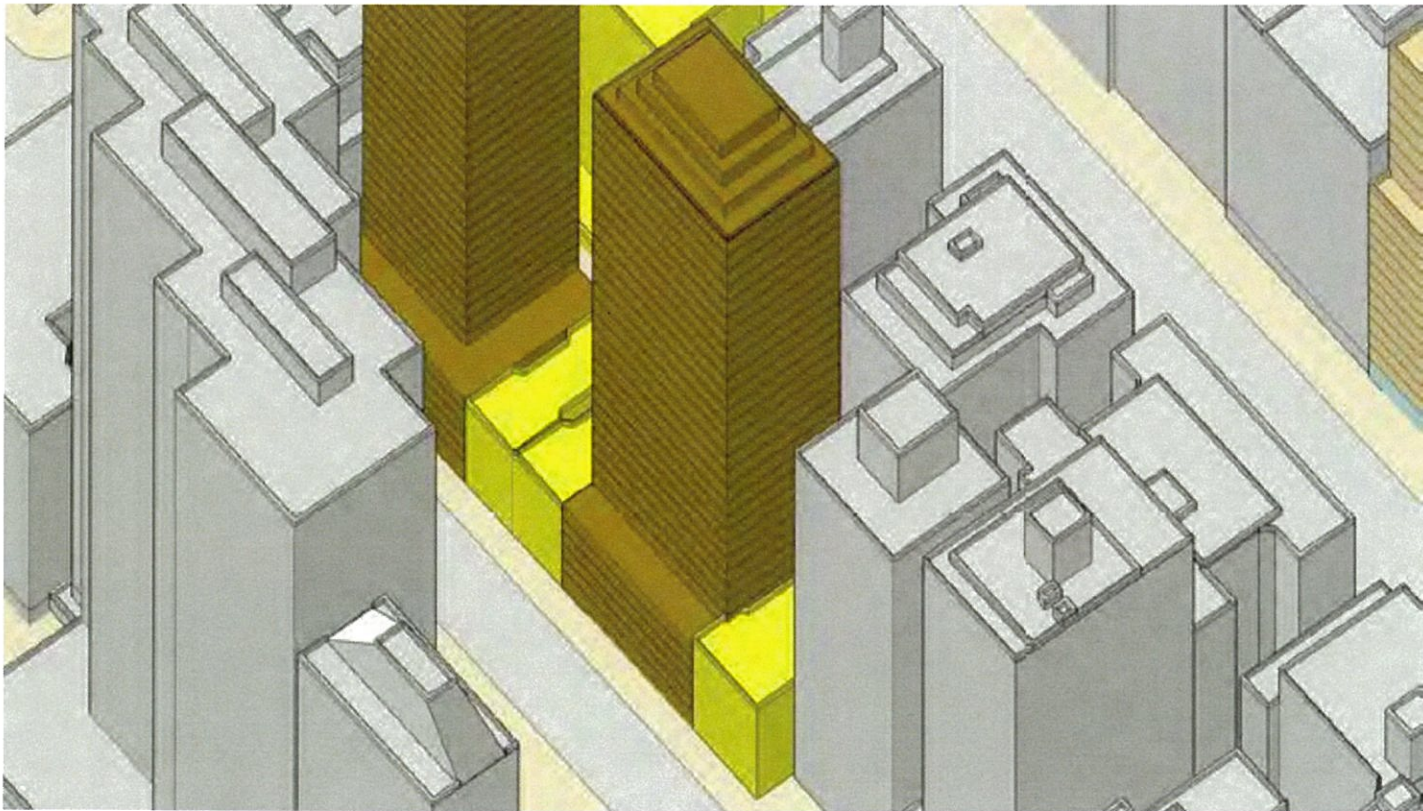
- **Consistency with neighborhood context and built character**
- **Consistency with City Housing Policy: Accommodate growth**

Proposed Text Amendment

Create tower-on-a-base rules in lieu of standard tower rules for narrow streets in East River Fifties Area

- Minimum tower coverage = 30%
- Maximum tower coverage = 40%
- At least 45 to 50% of FAR must be below 150'
- Tower must be set back above the base (15')
- Base heights 60 to 85'
- FAR and uses remain unchanged

Tower-on-a-Base Example:



Meets Policy Goals

- Prevents construction of towers of unlimited height by:
 - limiting merger through minimum tower coverage
 - Requiring 45-50% of FAR to be below 150 feet
- Ensures future development aligned with existing context
- Allows reasonable growth:
 - Accommodates as much FAR as Tower-on-base buildings on wide streets like First Avenue



Testimony of Carter Ledyard & Milburn LLP
to the
New York City Council
Subcommittee on Zoning and Franchises
November 20, 2017
Public Hearing on Land Use Review Application N 180082 ZRM

Good morning Chair Richards and Members of the Subcommittee on Zoning and Franchises. I'm Karen Meara of Carter Ledyard & Milburn and with me is Sandy Hornick, Planning consultant. We represent the Applicants for the proposed East River Fifties Text Amendment -- the East River Fifties Alliance, Inc., Manhattan Borough President Brewer, Council Members Kallos and Garodnick and State Senator Krueger.

The Applicants seek the Commission's support for a text amendment that would change the height and bulk regulations that apply to new development on narrow streets in the Project Area -- the R10 portions of the blocks bounded by East 59th Street, First Avenue, East 51st Street and the East River.

The current R10 zoning, enacted 56 years ago, allows the construction of standard towers on narrow streets. Standard tower rules have no height limit, and no minimum tower coverage, packing (i.e. that a certain percentage of FAR be located below 150 feet), or streetwall requirements. While decades ago these rules produced buildings in the 250 to 500 foot range -- and you can see that in the built fabric of the Project Area -- recent technological advances now make it possible to construct extremely tall towers of over 800, 900 or even 1000 feet under those same rules. The Project Area is the only residential neighborhood in the City still subject to standard tower regulations on its narrow streets. Every other R10 residential neighborhood has some kind of contextual protection -- historic district designation, R10A contextual zoning, or tower-on-a-base controls on wide streets.

Extremely tall towers do not match the character of the Project Area. The predominant building type is a mid-rise apartment building of 14-20 stories on a large lot. There are also quite a few lower-rise residential buildings less than 6 stories concentrated on Sutton Square and portions of East 58th Street and First Avenue. 87 percent of buildings heights are consistent with Quality Housing limits of 210 feet on wide streets and 185 feet on narrow streets. Less than 8% are towers over 300 feet tall. Most of those range from 315 to 386 feet. Only one, at

485 feet, exceeds 400 feet, and that outlier fronts on the 320-foot wide right of way along the Queensboro Bridge.

For over two years, the Applicants explored options for addressing this and other concerns, and worked to ensure that any proposal would be consistent with the City's broader planning and housing goals. After extensive study and repeated consultation with the Department, the Applicants propose to apply modified tower-on-a-base rules in lieu of standard tower rules to narrow streets in the Project Area. Tower on a base has no absolute height limits but controls scale through minimum tower coverage and packing rules. The Text Amendment would generally require new developments to have

- minimum tower coverage of 30%
- maximum tower coverage of 40%
- 45 to 50% of FAR packed below 150 feet
- a streetwall of 60-85 feet, and
- a mandatory setback

There would be no change in existing permissible uses, and no change in base or maximum allowable FAR. Minimum tower coverage requirements would deter unlimited zoning lot mergers, just as it already does on wide streets, and the packing rule would ensure that in most cases, new buildings would be no more than 35 stories or so. These controls would more closely align future construction with the existing built environment, while still accommodating reasonable growth.

Finally, we note that, prior to approving the proposed Amendment, City Planning added a "vesting modification." That modification would ensure that projects currently in progress would be permitted to continue, regardless of whether such projects meet the generally applicable vesting standards applied by the Board of Standards and Appeals after a full hearing on the merits of particular cases. Here, we urge the Council to remove that provision, as it would create special rules for a single property owner. We believe any determination on vesting is best left, in this situation, to the BSA.

I thank you for your time and urge your support.

Zoning and Franchises Committee
Hearing on Self-Storage Zoning Text Amendment (OPPOSED)
Submitted by Zach Mishaan | Vice President, Robert K. Futterman & Associates
November 20, 2017

My name is Zach Mishaan and I am a Vice President at Robert K. Futterman and Associates, a retail leasing and investment sales brokerage firm. My firm has worked extensively as a commercial broker selling properties in manufacturing zones across New York City.

I am here today to offer comment on the self-storage text amendment.

I believe it is a flawed notion that self-storage is gobbling up sites in the Industrial Business Zones and making it harder for manufacturers to exist in these zones. In my experience, I have not seen a self-storage developer compete with a manufacturer across the IBZs.

As a commercial broker, I can attest that self-storage plays an important role in acquiring and developing vacant land that needs remediation or significant investment often bringing a blighted lot to a state of good repair.

Currently, I can point to a site on Ralph Avenue in Brooklyn, a vacant 70,000 square foot lot that needs substantial repair and remediation, which has been sitting on the market for several years. It is in the Flatlands/Fairfield IBZ. I have had some initial conversations with self-storage developers who are interested in purchasing and remediating this site, but because of these potential IBZs restrictions, no deals are proceeding and the site will continue to just sit there. I am not aware of any other interest in this site. These situations are not problematic for the self-storage developer alone, but for commercial brokers and property owners whose options for deals will diminish.

The uses other than self-storage that we see occasionally buying these sort of sites in IBZs include construction supply yards for raw materials or logistics and warehousing. If self-storage effectively disappears from IBZs, these will be the uses that may take its place rather than manufacturing.

Having come from a career in the garment sector, I am well aware of the challenges that manufacturers grapple with ranging from labor rates to available workforce to taxes -these factors affect the manufacturing landscape a great deal more than the growth of self-storage in this City.

I do not believe this text amendment will meet the City's anticipated goal of helping manufacturers grow in New York City and may have unintended consequences in the Industrial Business Zones.

Thank you for your time.

Submitted by:

Name: Zach Mishaan Phone: 212.331.0127

Email: zmishaan@rkf.com

Photos of Ralph Avenue Site



Zoning and Franchises Committee Hearing
Self-Storage Zoning Text Amendment - Opposed
Submitted by Shahid Mahmood, President of Delta General Contracting & Management Inc.
November 20, 2017

My name is Shahid Mahmood and I am the President of Delta General Contracting & Management Inc. based in the Bronx. Delta employs 20 people and we work as a subcontractor on major construction projects across the City.

I am here today to express my concern regarding the self-storage text amendment. More than 70 percent of Delta's business is providing construction services to the self-storage industry. We have 20 extraordinarily committed and skilled tradespeople on our staff doing everything from insulation to masonry to cement work. We have worked extensively with CubeSmart, Storage Post and Storage Deluxe, among other companies.

One of the things I have been most proud of as a general contractor is working on projects that take dilapidated and vandalized sites and turn them into something that is good for the community and serves the community. Many of the self-storage projects that Delta has worked on have helped significantly improve the condition of a site and streetscape.

I am deeply dismayed that the City is targeting the self-storage industry and jeopardizing jobs – real construction jobs supporting the industry. My employees are at risk if no new self-storage gets built as a result of this proposal. I will have to lay people off.

Not only do I have experience as a subcontractor on self-storage developments, but also my company relies on self-storage facilities for storing equipment and vehicles. It has become an essential part of our business. In fact, having access to self-storage units across the City helps us reach our job sites quickly and efficiently. For example, we rent several self-storage units across the boroughs for storing workers' supplies and equipment that they can easily access. At some facilities, we are able to rent a parking spot and store trailers and vehicles (with large equipment like jackhammers).

The negative consequences of this text amendment will be severe, especially for a small MWBE business like Delta. I ask the City Council to vote down this text amendment.

Submitted by:

Name: Shahid Mahmood

Company: Delta General Contracting & Management Inc.

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GMDC

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Good Morning Chair Richards and members of the Zoning and Franchises Subcommittee. Thank you for the opportunity to testify. My name is Cassandra Smith and I am the Senior Project Manager of the Greenpoint Manufacturing and Design Center. We are a non-profit developer of affordable manufacturing space for small businesses. We have developed over 700,000 SF of space in New York City. We own and manage 5 buildings which are now home to over 600 manufacturing jobs. Just last week, we closed on our next project in Ozone Park, Queens, where we are beginning our renovation work today, and creating space for 80 more jobs.

I am here to urge the Zoning and Franchises Subcommittee to change the A-Text version of the Self-Storage Text Amendment back to its original version. The A-Text fails to address the challenge of competing uses in manufacturing areas, making it even harder for industrial and manufacturing businesses to afford to stay in the City. However, the original proposal would set a foundation for protecting the jobs within the Industrial Business Zones. The original proposal is not about limiting self-storage; it is about the future of the IBZs. Self-Storage occupies a lot of space in New York City and there are plenty of other areas in which to develop buildings. Preserve manufacturing areas for job intensive industrial businesses, not passive storage which contributes very little to the efforts of New Yorkers to earn a decent living.

The jobs created by manufacturing businesses in New York City are good paying jobs. The industrial and manufacturing sector has always played a key role in creating a working middle class in our city. While the sector has changed over time, wages remain strong. Average wages in the industrial sector, and in GMDC's own buildings, are over \$50,000 a year, significantly more than average wages in retail and customer service.¹ In a city where affordability is a constant challenge, retaining the kinds of jobs that allow people to stay in the city is crucial to an equitable economic development strategy.

When space is preserved for manufacturing, good jobs stay in the city. If manufacturers are less concerned about being priced out of their space, they are able to focus their attention back into running their business, whether through investing in new equipment or hiring more employees. Manufacturers have been pushed out of the city due to rising real estate prices for many years, but there has been continuous demand for affordable industrial and manufacturing space. GMDC's buildings are currently 100% leased, with no vacant space, though the inquiries for space from small businesses continue.

¹ New York City Council, Engines of Opportunity, Page 22. <http://council.nyc.gov/land-use/wp-content/uploads/sites/53/2017/05/Engines-of-Opportunity-Full-Report.pdf>

GMDC

The proposed special permit included in the original amendment begins tackling the displacement of good paying jobs from New York City, in a way the A-Text does not. A major challenge to the sector has been the competing uses allowed on industrial-zoned land. The Council's *Engines of Opportunity* report recognized the "continued pattern of speculation and warehousing...and lack of suitable zoning"². The overly broad use groups allowed in M zones have allowed incompatible uses to displace industrial businesses and workers, leading to a loss of jobs. The Administration's Industrial Action Plan aimed to address this challenge by limiting self-storage and hotel uses via a special permit³. Tightening up the zoning in M zones is the only way to protect land for jobs, and a special permit for competing uses is a good first step, updating the zoning text to catch up with the uses that have turned their attention to industrial areas in recent years.

The A-Text sets a terrible precedent for protecting core industrial areas. This proposal is about much more than self-storage. The original proposal creates, for the first time, zoning protections for the city's 21 IBZs.¹ It would effectively restrict a competing use and lay the foundation for future use restrictions. By contrast, the A-Text - if enacted - would put a bullseye on the Industrial Business Zones and demonstrate that industry interests can undermine even the City's own stated policy goals. It is up to the City to set the right precedent.

The A-Text is built on unsubstantiated claims by the self-storage industry. The self-storage industry has said, repeatedly and throughout the ULURP process, that their facilities are used by small businesses. In spite of the repetition, there is no evidence to back up these claims. There's also no evidence to suggest that, even if small businesses do use self-storage, that 1) the current demand is not being met by the existing supply of units or 2) that these business-oriented units need to be located in the IBZs. After all, even under the original proposal, self-storage would still be permitted in many parts of the city. **There is already considerable space available for self-storage in the city.** The proposed special permit for self-storage only applies in "designated M-districts", areas which largely overlap with the City's existing core manufacturing areas, the Industrial Business Zones, as shown in the map on the left.⁴ In other words, new self-storage storage facilities will still be permitted as-of-right in C8 and M zones outside of the "designated M-districts", as shown in the map on the right⁵.

GMDC has found itself bidding against the self-storage industry continually for the past few years in numerous manufacturing zones. The seller of the building we just purchased in Ozone Park told us that the reason they chose to sell us the property was because our tenants create good jobs and we shared with them that we expect there to be at least 80 jobs in the building once it is fully leased up. In contrast, the self-storage company we were bidding against told the seller that they would have 6 jobs in the 85,000 SF property in the first year, with the hope that they would be able to reduce that down to 4 jobs within a year.

² Ibid., 20.

³ Industrial Action Plan. <http://www1.nyc.gov/office-of-the-mayor/news/780-15/mayor-de-blasio-speaker-mark-viverito-action-plan-grow-21st-century-industrial-and#/0>

⁴ NYC DCP, Environmental Assessment Statement: Self-Storage Text Amendment, Page 31.

⁵ Ibid., 34.

GMDC

A majority of community boards voted in favor of the original text. They have been cut out of the process for the A-Text. They want job intensive uses in their industrial areas. We need to strengthen our core industrial areas is to ensure that the good jobs manufacturing creates stay in the city. If we're interested in creating equitable economic development, we should be preserving and growing more opportunities for manufacturers to be in New York. The A-Text does not do this. The City should adopt language that will prioritize the need for good jobs in our core industrial areas.

I would like to close with some information about GMDC's tenants. Proximity to markets and labor were the top two reasons they gave for locating their business in New York City on the most recent tenant survey that GMDC conducted in 2016. Third on the list was Quality of Life. GMDC's small business tenants are people who want to live in New York City, who want to make their homes here. Please protect the spaces where they make their living so they and their employees can continue to contribute to New York City's economy and culture.

Thank you for your time.

Testimony
Zoning and Franchises Subcommittee
November 20, 2017

Presented by:

Nancy Carin
Executive Director
Business Outreach Center Network, Inc.
85 S. Oxford Street, Brooklyn, NY 11217

Good Morning Chair Richards and members of the Zoning and Franchises Subcommittee. Thank you for the opportunity to testify. My name is Nancy Carin and I am the Executive Director at Business Outreach Center Network. For over 20 year we have been working to save and create jobs through small business development in NYC, with a special focus on minority and immigrant communities. During this time I have witnessed how important industrial and manufacturing jobs and opportunities are to these local communities and as an Industrial Business Solutions Provider, I have witnessed the critical need for affordable space for industrial and manufacturing businesses that are committed to their workforce and customers in NYC.

We are here to urge the Zoning and Franchises Subcommittee to change the A-Text version of the Self-Storage Text Amendment back to its original version.

Whether the City passes the original proposal or the A-Text will determine the future of the Industrial Business Zones across New York City: **whether they will be centers for good-paying jobs and common-sense land use policy or not.**

In preparing for today, I reached out to businesses in BOC's Good Jobs and Community Wealth Building Initiative, and I would like to present a statement by James Peterson the owner of E.A.T. w/ Culinary Professionals Inc. in the South Bronx. Mr. Peterson stated:

I am currently looking for 15,000 - 20,000 square feet for manufacturing and distribution for city, state and federal contracts, but there is not an availability of space. Space has been taken up by an abundance of self storage facilities. I also believe that these self storage facilities only have 1-3 employees and their space could be utilized for companies with 40-50 employees, which my company would likely be doing. So in my best efforts, I have not been able to find suitable space. Therefore, I support the original proposal for the special permit to limit the growth of self-storage facilities. My name is James Peterson and feel free to contact me at any time.

People like Mr. Peterson care about creating good jobs for community residents, and I know that NYC Council shares Mr. Peterson's values. With a majority of workers foreign-born and over 80% of workers being people of color, the industrial and manufacturing sector provides access to good paying jobs while often not requiring a college degree¹. Average wages in the industrial sector are over \$50,000 a year, significantly more than average wages in retail or food service.² In a city where affordability is a constant challenge, retaining these jobs is crucial to an equitable economic development strategy. **This is a good jobs policy for all New Yorkers.**

¹ Ibid.

² New York City Council, Engines of Opportunity, Page 22. <http://council.nyc.gov/land-use/wp-content/uploads/sites/53/2017/05/Engines-of-Opportunity-Full-Report.pdf>

Industrial business zones are irreplaceable assets that the city should protect. Zoning is a critical tool to meet the demand for industrial and manufacturing space. And once industrial and manufacturing space is lost, it is lost for the future of the city.

The Council's *Engines of Opportunity* report recognized the "continued pattern of speculation and warehousing...and lack of suitable zoning"³. The overly broad use groups have allowed incompatible uses to displace industrial businesses and workers, leading to a loss of jobs. The Administration's Industrial Action Plan aimed to address this challenge by limiting self-storage and hotel uses via a special permit⁴.

We saw progress when, in 2015, the de Blasio Administration and the City Council announced a 10-Point Industrial Action Plan. It included the language: "Limit New Hotels and Personal Storage in Core Industrial Areas to Reduce Use Conflicts and Support Diverse Economic Growth". The Administration itself noted that self-storage "facilities do not create a high number of jobs and thus do not align with the Mayor and Council's vision for economic development in core industrial areas."²The A-Text runs counter to this plan and will harm NYC's industrial and manufacturing sectors.

At BOC, we recognize that self storage is used by microenterprises for business purposes. However, the proliferation of self-storage around the city is so advanced already, that we see no evidence that the current demand by microenterprises is not being met by the existing supply of units. And most emphatically we see no evidence that these business-oriented units need to be located in the Industrial Business Zones.

For these many reasons, jobs being number one, we strongly urge the Zoning and Franchises Subcommittee to change the A-Text version of the Self-Storage Text Amendment back to its original version.

³ Ibid., 20.

⁴ Industrial Action Plan. <http://www1.nyc.gov/office-of-the-mayor/news/780-15/mayor-de-blasio-speaker-mark-viverito-action-plan-grow-21st-century-industrial-and#/0>



Good Morning Chair Richards and members of the Zoning and Franchises Subcommittee. Thank you for the opportunity to testify. My name is Bill Wilkins and I am the Director of Industrial Development at Local Development Corporation East New York (LDCENY).

The LDCENY was the first; In Place Industrial Park, the first Industrial Business Improvement District (BID) in New York City and the first designated Empire Zone in the "Zones" program under Empire State Development. We have along storied past of protecting and preserving industrial and manufacturing space. Also, the organization was formed over 38 years ago.

We are [here/writing] to urge the Zoning and Franchises Subcommittee to change the A-Text version of the Self-Storage Text Amendment back to its original version. While the original proposal would set a solid foundation for protecting the jobs within the Industrial Business Zones, A-Text fails to address the challenge of competing uses, making it harder for industrial and manufacturing businesses to afford to stay in the City.

Whether the City passes the original proposal or the A-Text will determine the future of the Industrial Business Zones across New York City: **whether they will be centers for good-paying jobs or areas where industry interests overcame the need for common-sense land use policy.**

- **Industrial and manufacturing jobs are good paying jobs.**

The industrial and manufacturing sector has historically played a key role in creating a robust working middle class. While the sector has changed since its peak in the middle of the 20th century, wages remain strong. Average wages in the industrial sector are over \$50,000 a year, significantly more than average wages in retail or food service.¹ In a city where affordability is a constant challenge, retaining the kinds of jobs that allow people to stay in the city is crucial to an equitable economic development strategy.

- **The majority of industrial and manufacturing works are immigrants and people of color.**

In terms of who receives these wages, the demographic breakdown of the sector presents a diversity that mirrors New York City as a whole. With a majority of workers foreign-born and over 80% of workers being people of color, the industrial and manufacturing sector provides access to good paying jobs while often not requiring a college degree².

¹ New York City Council, Engines of Opportunity, Page 22. <http://council.nyc.gov/land-use/wp-content/uploads/sites/53/2017/05/Engines-of-Opportunity-Full-Report.pdf>

² Ibid.

- **The proposed special permit begins tackling the broader displacement of good paying jobs from New York City.**

A major challenge to the sector has been the commercialization of industrial-zoned land. The Council's *Engines of Opportunity* report recognized the "continued pattern of speculation and warehousing...and lack of suitable zoning"³. The overly broad use groups have allowed incompatible uses to displace industrial businesses and workers, leading to a loss of jobs. The Administration's Industrial Action Plan aimed to address this challenge by limiting self-storage and hotel uses via a special permit⁴.

- **There is already considerable space available for self-storage**

The proposed special permit for self-storage only applies in "designated M-districts", areas which largely overlap with the City's existing core manufacturing areas, the Industrial Business Zones, as shown in the map on the left.⁵ In other words, new self-storage storage facilities will still be permitted as-of-right in C8 and M zones outside of the "designated M-districts", as shown in the map on the right⁶.

- **When space is preserved for manufacturing, those jobs stay in the city.**

If manufacturers are less concerned about being priced out of their neighborhood, they are able to focus their attention back into running their business, whether through investing in new equipment or scaling up and hiring more employees. Manufacturers have been pushed out of the city due to rising real estate prices, but there has been continuous demand for affordable industrial and manufacturing space. The City has recognized this challenge, launching the non-profit Industrial Development Fund to address this gap and keep more jobs in the city. By enacting the original self-storage text amendment, the Council will be helping to advance the goals of the Fund, as well as the broader Industrial Action Plan.

- **The A-Text prioritizes space for stuff over space for jobs**

We need to strengthen our core industrial areas is to ensure that the good jobs manufacturing creates stay in the city. If we're interested in creating equitable economic development, we should be preserving and growing more opportunities for manufacturers to be in New York. The A-Text does not do this. The A-Text approach is to provide some space for manufacturing in new self-storage developments in Industrial Business Zones. Rather than draft zoning language to preserve a status quo that ensures a place for people's stuff, the City should adopt language that will prioritize the need for good jobs in our core industrial areas.

- **The A-Text runs against communities' broad support for the original proposal**

³ Ibid., 20.

⁴ Industrial Action Plan. <http://www1.nyc.gov/office-of-the-mayor/news/780-15/mayor-de-blasio-speaker-mark-viverito-action-plan-grow-21st-century-industrial-and#/0>

⁵ NYC DCP, Environmental Assessment Statement: Self-Storage Text Amendment, Page 31.

⁶ Ibid., 34.

A key part of the Uniform Land Use Review Process (ULURP) is the weighing of support (or opposition) of local communities. 27 community boards would be directly impacted by the self-storage proposal. On the original proposal, 14 voted in favor, while only 4 voted in opposition (9 community boards made no recommendation). None of them voted on the A-Text as it was introduced after their part of the ULURP process.

- **The A-Text sets a terrible precedent for protecting core industrial areas**

This proposal is about much more than self-storage. The original proposal creates, for the first time, zoning protections for the city's 21 Industrial Business Zones.¹ It would effectively restrict a competing use and lay the foundation for future use restrictions. By contrast, the A-Text - if enacted - would put a bullseye on the Industrial Business Zones and demonstrate that industry interests can undermine even the City's own stated policy goals. It is up to the City to set the right precedent.

- **The A-Text doesn't limit self-storage development; it caters to it**

The framework of the original proposal to limit self-storage was through a City Planning Commission (CPC) special permit that would be applied in the Industrial Business Zones. It was clear how self-storage was being limited - direct community oversight. The same can't be said of the A-Text. It continues to allow self-storage as-of-right, introduces different development tiers depending on lot size, and actually grants a density bonus for self-storage developers in M1-1 areas. The fact that there are ways for self-storage developers to follow the A-Text precisely and end up with zero industrial space demonstrates just how far we've come from the original proposal. The priorities have been flipped.

- **The A-Text runs counter to the Administration's own Industrial Plan**

In 2015, the de Blasio Administration and the City Council announced a 10-Point Industrial Action Plan. The second pillar of that plan was land use and zoning: "Limit New Hotels and Personal Storage in Core Industrial Areas to Reduce Use Conflicts and Support Diverse Economic Growth". The Administration itself noted that self-storage "facilities do not create a high number of jobs and thus do not align with the Mayor and Council's vision for economic development in core industrial areas."²

- **The A-Text is built on unsubstantiated claims by the self-storage industry**

The self-storage industry has said, repeatedly and throughout the ULURP process, that their facilities are used by small businesses. In spite of the repetition, there is no evidence to back up these claims. There's also no evidence to suggest that, even if small businesses do use self-storage, that 1) the current demand is not being met by the existing supply of units or 2) that these business-oriented units need to be located in the Industrial Business Zones. After all, even under the original proposal, self-storage would still be permitted in many parts of the city.



EVERGREEN

Your North Brooklyn Business Exchange

Testimony of Evergreen on Self-Storage Facilities November 20, 2017

Evergreen is a membership organization that helps the nearly 1,200 industrial businesses in North Brooklyn to grow in order to keep their 11,700 quality blue collar jobs in our community. This represents 14% of the City's manufacturing employment base. We support the New York Department of City Planning's effort to restrict self storage facilities in NYC's Industrial Business Zones (IBZs) because they drive up industrial land costs and drive out job-rich businesses such as small manufacturers in favor of a much lower job density use. We far prefer the original text to the revised version that was approved by the Planning Commission.

We urge the Zoning and Franchises Subcommittee to change the A-Text version of the Self-Storage Text Amendment back to its original version. While the original proposal would set a solid foundation for protecting the jobs within the Industrial Business Zones, A-Text fails to address the challenge of competing uses, making it harder for industrial and manufacturing businesses to afford to stay in the City. What was originally intended to be a limitation on the proliferation of new self storage facilities has instead turned into a height and density bonus for developers of these facilities.

Manufacturing is alive and well in North Brooklyn, and for the past 35 years Evergreen has fought to keep it that way. North Brooklyn companies make everything from bespoke suits to architectural steel, from store installations for Park Avenue boutiques to fortune cookies for corner takeout joints. This is a dynamic combination of businesses old and new, traditional and innovative, big and small. But what they create most are good paying jobs for the people who live here.

North Brooklyn's industrial businesses face many challenges. Manufacturing company closure and job loss in North Brooklyn and Greenpoint / Williamsburg is significantly and disproportionately higher than losses in other parts of Brooklyn and Queens in the last decade. This disparity is the result of additional pressure – i.e., commercial and residential conversion – on industrial firms and businesses in those areas, beyond industrial businesses in other parts of the city.

Our community needs these jobs. Nearly 40% of the industrial workforce live in the local area. These jobs, on average, pay our residents 73% more than local retail establishments; or \$52,842 vs. \$30,620 annually. Additionally, over 60% of manufacturing jobs offer benefits, compared with 30% of service jobs. Also, these jobs frequently do not require English proficiency or advanced education. Considering 20% of our local residents do not speak English, 31% live at or below the poverty line and nearly 37% of are on some form of public assistance, these jobs offer the best path to self sufficiency and economic security for our community residents.

Protecting and promoting our industrial sector is crucial to the city's overall economic development. The sector provides close to 500,000 jobs in New York City, making up nearly 15% of the city's workforce, and contributed \$1.7 billion in tax revenues. The manufacturing and industrial sector is not only a strong component of our economy but a reliable source of jobs for many of our fellow New Yorkers.



**Zoning and Franchises Committee
Hearing on Self-Storage Zoning Text Amendment (OPPOSED)
Submitted by Safe N Lock Self Storage - Marc Sharinn, CEO
November 20, 2017**

My name is Marc Sharinn and I am one of the owners of Safe N Lock Self Storage, a self-storage developer that employs 20 people and builds facilities across New York City.

We recognize the Department of City Planning's efforts to arrive at a mutually beneficial outcome for the self-storage and the industrial sectors in the amended text amendment, especially given the mixed and often critical public feedback to the original text amendment. However, the proposal before you does not strike a viable balance.

From the start, we have been confounded by the premise that self-storage stands in the way of manufacturing growth in IBZs. This assertion has not been backed by any data whatsoever. Here is the hard data that we do have, however:

- Self-storage occupies only 1.6% of the square footage of IBZs across New York.
- Over the last ten years, only two self-storage facilities have appeared in IBZs per year.
- Furthermore, the New York Metropolitan Area is the #1 under-supplied area for self-storage in the United States.

In SNL's history acquiring and developing sites for more than 12 years, we have never displaced or competed with manufacturing uses on the sites that we develop. More often than not, we are remediating a contaminated site that has been left vacant and building a facility that brings value to local residents and

businesses.

If there is any use in the IBZs that is complementary to manufacturing and job creation, it is self-storage. Across our facilities, 30 percent of our customers are businesses. They are home contractors; artists and artisans; non-profits; and manufacturers who live and work in the community and rely on affordable warehousing. 47% of businesses using self-storage are MWBEs and 68% access their facility daily or weekly, according to a recent survey.

With existing self-storage facilities already near capacity, eliminating competition will likely result in sharp price spikes and hurt residents and businesses which include manufacturers.

The proposal you have before you today is a mixed-use alternative. But a mixed-use alternative will succeed only if it can capitalize on the self-storage industry's ability to build new facilities with manufacturing space. This proposal is a far cry from striking that balance.

We have brought to the table mixed-use compromises that would help the City achieve its goals, but they are not reflected in this text.

Instead, the Proposed Text is an extraordinarily risky venture requiring that we completely change our business model. Our investors have already walked away from deals.

Safe N Lock Self Storage will not survive this proposal.

We urge the Council to base citywide zoning policies on data, not speculation, and to disapprove the zoning text before you.

Thank you for your time.

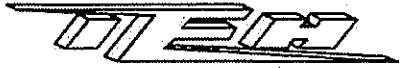
Submitted by:

Name: Marc Sharinn

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140 58TH STREET 8E
BROOKLYN NY 11220
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Public Scoping Meeting on Self-Storage Text Amendment
New York City Department of Planning
Submitted by IEH
March 28, 2017

This statement is being submitted on behalf of IEH, a 75-year old manufacturing company based in Brooklyn, to express concern about the proposed Self-Storage Text Amendment to establish a Special Permit under jurisdiction of the City Planning Commission (CPC) for all new self-storage development in the proposed "Designated Areas".

Since 1941, IEH, a family business, has been manufacturing superior products for demanding applications included printed circuit board connectors, signal or power contacts, or custom interconnects. We supply these products to the aerospace, defense, medical and commercial sectors. IEH is based out of the Brooklyn Army Terminal with more than 100 employees.

As a manufacturer, our space at the Brooklyn Army Terminal houses a great deal of technology and machinery critical to producing connectors. We have a single floor layout at the Army Terminal which is conducive to our operations. Over time, some of the older machinery we own is used with less frequency and requires storage, rather than taking up valuable floor space.

For this purpose, IEH uses self-storage at an Extra Space facility located in Sunset Park. We recently rented two 10x15 units that store three very large molding machines which were taking up too much of our office floor space. We also store customer files that we are required to sometimes keep for several years for compliance purposes.

We have found self-storage to be a cost-effective and efficient solution to our space constraints. The freed up space afforded with removing these non-essential molds/machinery will make it possible for IEH to purchase more up to date machines and free up viable work space. Therefore, this generates more money produced by the business and economic activity for the City.

It is more expensive to move/relocate to a bigger space and use the extra footage to store "non-essential" machinery instead of "profit producing" modern machinery with extra employees to run those extra machines/jobs. In the end, it's more money for everyone involved.

Manufacturing companies in New York City like IEH face many challenges. We can tell you that limiting self-storage will not address those issues.

We have been committed to operating in New York City for more than 70 years, but we need to look for cost-saving measures where we can find them and self-storage is one of these solutions. It is affordable, easily accessible at all hours and located within a very short distance from our main office in the Army Terminal.

We believe the proposed City Planning text amendment does not take into accurate account the important role that self-storage can play in Industrial Business Zones supporting manufacturing businesses like ours. We have found there is synergy between an industrial business like IEH and self-storage. Without access to this option, we would expend considerably more funds to store our equipment. And if self-storage supply is limited in industrial zones in the future, this could potentially drive up costs for the units that we are currently renting at a competitive price.

IEH encourages the Department of City Planning to reconsider the proposed text amendment to limit self-storage development in New York City.

Submitted by: Jackie Nicasio
Company: IEH
Title: Purchasing Buyer
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Catholic Charities Vendor 61678

Registered Charities 21-29-44

Department of Education Vendor AFO455276

216 Wakeman Place

Brooklyn, New York 11220

Phone 347 529 8694 Fax 347 628 0477

www.aforumforlife.org aforumforlife@aol.com

April 4, 2017

To whom it may concern,

This statement is being submitted to express concern about the proposed Self-Storage Text Amendment to establish a Special Permit under jurisdiction of the City Planning Commission (CPC) for all new self-storage development in the proposed "Designated Areas".

A Forum for LIFE is a non-profit and public charity that focuses on a holistic approach to health and wellness. We are a service delivery provider training over 10,000 people a year to handle medical emergencies and distress in both children and adults. We offer our training sessions, run by certified professionals, to schools, churches, companies and other organizations around New York City. In fact, A Forum for LIFE has contracted with multiple New York City agencies to provide critical pediatric-care and first-aid trainings. These include the Administration for Children Services, the Department of Youth & Community Development, the Department of Homeless Services, as well as the Archdiocese of New York.

We are a non-profit organization based in Bay Ridge, but our operation requires a great deal of equipment and as a result, we have used a storage facility (Extra Space – 201 64th Street, Brooklyn – located in an IBZ) for about 10 years, solely for work-related purposes. The facility is walking distance from our office making it very convenient to access the essential medical equipment, mannequins and other tools needed to deliver medical trainings. We utilize our storage unit almost on a daily basis. The storage facility is an essential part of our everyday operation.

We hope the Department of City Planning will recognize that self-storage drives economic activity and helps small non-profits survive. The proposed text will affect the number and location of future self-storage facilities with the intention of promoting certain kinds of industrial jobs in these areas, when in fact, limiting these storage facilities may harm small businesses and organizations.

In our experience, storage facilities affect the economic growth of the city positively and I hope the Department of City Planning reconsiders its decision to place further restrictions on the self-storage industry.

Cordially,

Roman Matthews, CEO

A Forum for LIFE, Inc. is a 501 c 3, non-profit New York Corporation and Public Charity.

SMR CRAFTWORKS

**Public Scoping Meeting on Self-Storage Text Amendment
New York City Department of Planning
Submitted by Andrew Fishman, Owner of SMR Craftworks, Inc.
March 28, 2017**

My name is Andrew Fishman and I am the owner of SMR Craftworks, Inc. based in Brooklyn. I am submitting a comment in response to the Department of City Planning's proposed text amendment on self-storage in designated areas.

SMR Craftworks is a full service residential renovation company, based in Brooklyn for 15 years, specializing in customized top to bottom renovations. We employ 10 people who are trained professionals in framing, carpentry, cabinetry, painting, tile and flooring installation.

As a self-employed general contractor, I run my operation out of a home office. As you are probably aware, the home renovation business is an intensive one in terms of equipment and materials required. For the last three months, I have been renting a storage unit in Red Hook in order to store tools, equipment, supplies and ladders. My client projects range from installing floor tile to building a new staircase to a full gut renovation – all of which require a significant amount of machinery and raw materials.

Most of SMR's renovation projects and customers are based in Brooklyn. Having local and easily accessible self-storage is indispensable to my business. I access my self-storage unit in Red Hook three to four times per week on average.

When exploring options for storing equipment, I considered a traditional warehouse space, but it was far too expensive, especially in Brooklyn. Warehouses require long-term contracts and are often less accessible for a business like mine that needs flexible day-to-day access.

Self-storage has become an important part of SMR Craftworks' logistics. Small business owners, like myself, need local facilities to store our commercial goods. I would hope that this option continues to remain readily available and affordable for business-owners, like myself.

I strongly recommend the Department of City Planning reconsider its proposal to limit the development of storage in New York City.

Submitted by:
Andrew Fishman, Owner
SMR Craftworks, Inc.
2779 Strickland Avenue, Brooklyn, NY 11234
Phone: 718-637-4246
Andrew@smrcraftworks.com

When Love of Storage Collides With a City's Need for Space

Officials Want Fewer New Units in Industrial Areas

By WINNIE HU

Sally Lesser really needs a bigger apartment. Instead, she has a storage unit.

Into her 70-square-foot nook goes everything she cannot cram into the one-bedroom apartment in Brooklyn Heights she shares with her husband: out-of-season clothing, old files and Christmas ornaments, playbills from long-ago shows, even their grown son's childhood toys. All for \$275 a month.

"We could not live without our storage unit," said Ms. Lesser, 66, a costume designer. "Where are those Thomas the Tank Engines going to go?"

For many New Yorkers, a storage unit or two (or three) is the only solution to living small. It is the spare closet or extra room that they don't have, or can't otherwise afford in a crowded city with ever shrinking and more expensive living quarters, including so-called micro-apartments that are barely larger than storage units themselves. It is a temporary holding place for those in between jobs, moves, marriages and divorces, and an extension of the workplace for small businesses.

But as self-storage buildings have multiplied across the city, they are drawing increased scrutiny from city officials and community groups who say they take up space that could be used for something more productive. Now the city is proposing to restrict the development of new self-storage buildings in some industrial areas in the boroughs outside Manhattan, as part of a broader strategy to save more land for manufacturing and industry.

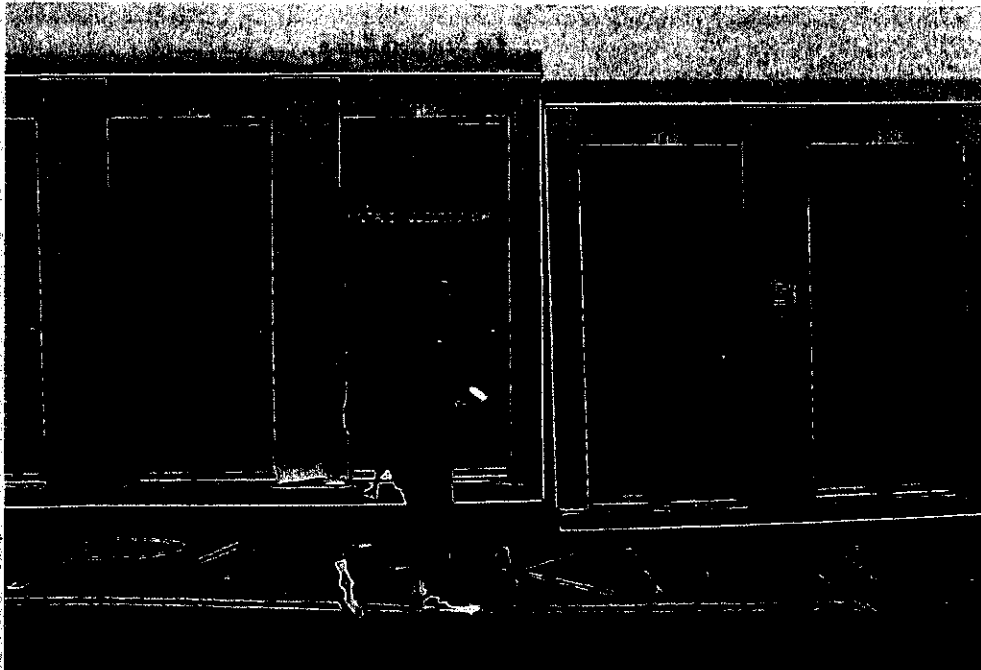
New York joins a small but growing number of communities, including San Francisco, Miami and Charleston, S.C., that have moved to restrict or curb the spread of self-storage buildings, seeking to strike a balance between the demands for more storage with the needs of communities for other things such as jobs, housing and grocery stores.

While even critics acknowledge that storage is needed, especially in space-challenged cities, some see the proliferation of these massive boxes as emblematic of the hoarding ways of Americans. As the comedian George Carlin joked about people's growing piles of material possessions: "That's what life is all about, tryin' to find a place for your stuff! Now the question for many is: Just how much storage does this country need?"

"We have a lot of self-storage facilities out here, and people are tired of seeing them pop up," said Charles Johnson, a councilman in Baytown, Tex., a city of about 75,000 near Houston with 23 self-storage buildings and two more under construction. At his suggestion, the local newspaper, The Baytown Sun, recently asked its readers if there should be a self-storage cap. They voted yes by nearly 2-to-1.

The self-storage industry has grown to about 50,000 sites nationwide after evolving from the moving-and-storage business in the Midwest and the South in the late 1960s, said Timothy J. Dietz, the president and chief executive of the Self Storage Association, an industry group. Nearly one-third are concentrated in Texas, California, Florida, Ohio and North Carolina.

Mr. Dietz said self-storage provided residents and businesses small, secure spaces, flexible month-to-month leases and cheaper prices than traditional warehouses. "Self-storage has become part of the fabric of our culture," he said. "It helps families in transition, businesses, soldiers,



retirees.

New York, perhaps surprisingly, has actually lagged the rest of the country in self-storage capacity, and its market is underpopulated, major metropolitan markets with an average of 35 square feet per person compared with 7.2 nationally, said R. Christian Sonne, an executive vice president for CBRE, who follows the industry.

For Kevin Rodriguez, 21, a pharmacy worker from Brooklyn, such storage units are the refuge of the working class, an affordable option for those without expensive homes. When his family was looking for a place to live, they stayed with relatives while their cherished photo albums, baptism gowns and baseball gloves went into storage. "I know people can be pack rats, but it's better than losing the things you once loved," he said. "It's memories for us."

Businesses have also come to depend on them. Andrew Fishman, the president of SMR Craftworks, an interior remodeling company, spends \$505 a month on a 200-square-foot unit in Brooklyn to store equipment and supplies that he used to keep at home on Staten Island so his workers have easier access to items they need.

But more self-storage has meant less of other things. Miami clamped down on new self-storage buildings after they popped up on main commercial corridors,

Kevin Rodriguez, top, and Sally Lesser, bottom, said they relied on their units at Treasure Island Storage in Brooklyn because they could not afford larger homes. The City Planning Commission, left, is proposing to restrict the development of new self-storage buildings in some industrial areas as part of a broader strategy to save more land for manufacturing and industry.

years on average. The city's manufacturing base has shriveled, to 76,300 workers in 2015 from 264,200 in 1990. The permit proposal requires the approval of the City Planning Commission and the City Council.

In a similar move, San Francisco carved out industrial districts that ban the development of self-storage buildings, along with hotels and office towers. "These industrial areas would not exist at all if you didn't have protections for them," Steve Wertheim, a San Francisco city planner, said.

Among the areas the proposal would impact is Red Hook, Brooklyn, which is already home to one of the city's largest self-storage sites. The 200,000-square-foot Treasure Island Storage, painted in patriotic red, white and blue, opened in a vacant warehouse in 2006. It has 2,000 storage units, nearly all of them full, with a waiting list for the larger sizes. The third floor has been converted into 18 artist studios and a gallery.

"None of us are in the field-of-dreams business; we're not going to build and hope they show up," said James Conkey, the president of Treasure Island Storage. "We're going to go where there's demand."

On a recent rainy afternoon, boxes, mirrors and chairs were being hauled in and out. Upstairs, Ms. Lesser was designing a 1940s movie costume in a 340-square-foot studio. Though this is her first time working in a storage building, she has practically lived out of them since she rented her first unit with a pay raise in the late 1990s.

Not long ago, she raided her storage unit for an exhibit at Treasure Island about the stuff that people love. She placed together a flamenco dress from scraps of handwritten notes, dress patterns, Bubble Wrap and many other things.

"It was kind of honoring that we are in a storage unit," she said. "I think they are so important in New York. It's not like the suburbs where people have attics and basements."

They also say the proposal unfairly singles them out and overlooks their support of businesses and manufacturers that use storage.

Marc Sharin, the chief executive of SNL Development Group in the Bronx, which has worked on 12 self-storage sites since 2011, said so much of the city is zoned for housing or already developed that industrial areas are "our fertile land." "We're already so limited in where we can build, it's really a death knell for us," he said.

Adam Friedman, the executive director of the Pratt Center for Community Development, said self-storage developers drove up real estate prices and displaced manufacturers, who provided more and better-paying jobs. He added that New York's proposal was not tough enough and would still allow industrial sites to be claimed by self-storage developers. "They're like cash cows," he said. "They have very little employment and very low operating costs, so they can pay more for land."

In Brooklyn, Greenpoint Manufacturing and Design Center, a nonprofit that redevelops buildings to house manufacturers, has been outbid by self-storage developers for a half-dozen sites in the past five years, said Brian T. Coleman, the chief executive. "These days, they are one of our biggest competitors," he said.

City planners said their proposal would have only a minimal impact on overall self-storage development since sites outside these designated industrial areas would not require a special permit.

But self-storage developers and operators have mobilized against what they call a "de facto ban," saying it will sharply curtail future supply at a time when most self-storage buildings are nearly full and demand is growing along with the city's population. They warn that it will result in higher prices for everyone who relies on them.

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N.Y. / REGION

APRIL 15, 2017

Sally Lesser really needs a bigger apartment. Instead, she has a storage unit.

Into her 70-square-foot nook goes everything she cannot cram into the one-bedroom apartment in Brooklyn Heights she shares with her husband: out-of-season clothing, old files and Christmas ornaments, playbills from long-ago shows, even their grown son's childhood toys. All for \$275 a month.

"We could not live without our storage unit," said Ms. Lesser, 66, a costume designer. "Where are those Thomas the Tank Engines going to go?"

For many New Yorkers, a storage unit or two (or three) is the only solution to living small. It is the spare closet or extra room that they don't have, or can't otherwise afford in a crowded city with ever shrinking and more expensive living quarters, including so-called micro-apartments that are barely larger than storage units themselves. It is a temporary holding place for those in between jobs, moves, marriages and divorces, and an extension of the workplace for small businesses.

But as self-storage buildings have multiplied across the city, they are drawing increased scrutiny from city officials and community groups who say they take up

space that could be used for something more productive. Now the city is proposing to restrict the development of new self-storage buildings in some industrial areas in the boroughs outside Manhattan, as part of a broader strategy to save more land for manufacturing and industry.

New York joins a small but growing number of communities, including San Francisco, Miami and Charleston, S.C., that have moved to restrict or curb the spread of self-storage buildings, seeking to strike a balance between the demands for more storage with the needs of communities for other things such as jobs, housing and grocery stores.

While even critics acknowledge that storage is needed, especially in space-challenged cities, some see the proliferation of these massive boxes as emblematic of the hoarding ways of Americans. As the comedian George Carlin joked about people's growing piles of material possessions: "That's what life is all about, tryin' to find a place for your stuff!" Now the question for many is: Just how much storage does this country need?

"We have a lot of self-storage facilities out here, and people are tired of seeing them pop up," said Charles Johnson, a councilman in Baytown, Tex., a city of about 75,000 near Houston with 23 self-storage buildings and two more under construction. At his suggestion, the local newspaper, The Baytown Sun, recently asked its readers if there should be a self-storage cap. They voted yes by nearly 2-to-1.

The self-storage industry has grown to about 50,000 sites nationwide after evolving from the moving-and-storage business in the Midwest and the South in the late 1960s, said Timothy J. Dietz, the president and chief executive of the Self Storage Association, an industry group. Nearly one-third are concentrated in Texas, California, Florida, Ohio and North Carolina.

Mr. Dietz said self-storage provided residents and businesses small, secure spaces, flexible month-to-month leases and cheaper prices than traditional warehouses. "Self-storage has become part of the fabric of our culture," he said. "It

helps families in transition, businesses, soldiers, retirees.”

New York, perhaps surprisingly, has actually lagged the rest of the country in self-storage capacity and is the most undersupplied major metropolitan market, with an average of 3.5 square feet per person compared with 7.2 nationally, said R. Christian Sonne, an executive vice president for CBRE, who follows the industry.

For Kevin Rodriguez, 21, a pharmacy worker from Brooklyn, such storage units are the refuge of the working class, an affordable option for those without expansive homes. When his family was looking for a place to live, they stayed with relatives while their cherished photo albums, baptism gowns and baseball gloves went into storage. “I know people can be pack rats, but it’s better than losing the things you once loved,” he said. “It’s memories for us.”

Businesses have also come to depend on them. Andrew Fishman, the president of SMR Craftworks, an interior remodeling company, spends \$505 a month on a 200-square-foot unit in Brooklyn to store equipment and supplies that he used to keep at home on Staten Island so his workers have easier access to items they need.

But more self-storage has meant less of other things. Miami clamped down on new self-storage buildings after they popped up on main commercial corridors, taking space away from restaurants, stores and gyms, said Adam J. Gersten, a member of Miami’s planning and zoning board. “We’re finally getting momentum in certain areas, and suddenly you see this eight-story box go up,” he said. “If all of them got built, it would have really dotted the landscape with these ominous boxes with barely any windows.”

Charleston, S.C., tightened its oversight of self-storage developments after half-a-dozen new ones were proposed in the past year, said Jacob Lindsey, the city’s planning director. The city has barred them from sites intended for multistory housing and now requires them to use the ground floor for a retail store or office. “Our goal is to make sure that our city maintains a balance of uses and its walkable, neighborhood character,” Mr. Lindsey said.

New York City’s 240 self-storage buildings include about 60 that have opened

in the last decade, according to industry estimates. Many are accessible 24 hours a day, seven days a week, offering free coffee, restrooms and internet access.

City planners have proposed a special permit for self-storage sites in designated industrial areas that would establish a review process that would take about two years on average. The city's manufacturing base has shriveled, to 76,300 workers in 2016 from 265,200 in 1990. The permit proposal requires the approval of the City Planning Commission and the City Council.

In a similar move, San Francisco carved out industrial districts that ban the development of self-storage buildings, along with hotels and office towers. "These industrial areas would not exist at all if you didn't have protections for them," Steve Wertheim, a San Francisco city planner, said.

Adam Friedman, the executive director of the Pratt Center for Community Development, said self-storage developers drove up real estate prices and displaced manufacturers who provided more and better-paying jobs. He added that New York's proposal was not tough enough and would still allow industrial sites to be claimed by self-storage developers. "They're like cash cows," he said. "They have very little employment and very low operating costs, so they can pay more for land."

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City planners said their proposal would have only a minimal impact on overall self-storage development since sites outside these designated industrial areas would not require a special permit.

But self-storage developers and operators have mobilized against what they call a "de facto ban," saying it will sharply curtail future supply at a time when most self-storage buildings are nearly full and demand is growing along with the city's population. They warn that it will result in higher prices for everyone who relies on

them.

They also say the proposal unfairly singles them out and overlooks their support of businesses and manufacturers that use storage.

Marc Sharinn, the chief executive of SNL Development Group in the Bronx, which has worked on 11 self-storage sites since 2011, said so much of the city is zoned for housing or already developed that industrial areas are “our fertile land.” “We’re already so limited in where we can build, it’s really a death knell for us,” he said.

Among the areas the proposal would impact is Red Hook, Brooklyn, which is already home to one of the city’s largest self-storage sites. The 200,000-square-foot Treasure Island Storage, painted in patriotic red, white and blue, opened in a vacant warehouse in 2006. It has 2,000 storage units, nearly all of them full, with a waiting list for the larger sizes. The third floor has been converted into 116 artist studios and a gallery.

“None of us are in the field-of-dreams business: We’re not going to build and hope they show up,” said James Coakley, the president of Treasure Island Storage. “We’re going to go where there’s demand.”

On a recent rainy afternoon, boxes, mirrors and chairs were being hauled in and out. Upstairs, Ms. Lesser was designing a flamenco costume in a 240-square-foot studio. Though this is her first time working in a storage building, she has practically lived out of them since she rented her first unit with a pay raise in the late 1990s.

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“It was kind of honoring that we are in a storage unit,” she said. “I think they are so important in New York. It’s not like the suburbs where people have attics and basements.”



November 9, 2017

Re: Self-Storage Text Amendment

Dear Members of the City Council:

The Brooklyn, Queens, Bronx and Staten Island Chambers of Commerce, representing over 5,000 businesses, oppose City Planning's current proposed measures to restrict, and effectively ban, self-storage in Industrial Business Zones (IBZs). Self-storage provides affordable, flexible warehousing for countless small businesses, including MWBEs, which cannot afford long-term warehouse leases.

According to CBRE, New York City is already the most underserved region in the United States for self-storage. Further restricting self-storage from IBZs, one of the very few areas in which they are permitted, will force businesses to pay higher prices at existing facilities or force business users to travel out of the city to access their units. Since many businesses access their storage facilities daily or weekly, it will become more difficult to continue using storage as primary or ancillary warehousing, and this may be the nail in the coffin for businesses already feeling the squeeze of high taxes, the high cost of labor and other dynamics.

Advocacy groups have not presented any evidence that restricting or banning self-storage will result in the return of manufacturing jobs to New York City. Leading advocacy groups all but admit that the purpose of their support is precisely to ban self-storage from developing in any IBZ. That is far different from the "balance" that the Department of City Planning has claimed to seek during this process.

By contrast, the self-storage industry has offered several alternatives, including one that would result in the build-out of hundreds of thousands of square footage of new industrial and manufacturing space housed inside self-storage developments on large lots.

It is also important to note that the Industrial Action Plan that the City Council and the Mayor unveiled in 2015 was not a ban on self-storage, as presented in the text before you. In fact, while we disagree with the plan's theoretical assessment on self-storage, it was one minor part of a much larger plan and was not presented in a vacuum. The fact is, self-storage represents less than 2% of the IBZs. The text before you ONLY restricts self-storage, leaving the door wide open for other non-manufacturing uses to simply replace storage.

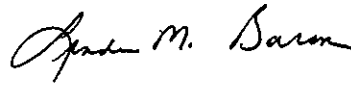
If this zoning text is adopted, only self-storage would be banned. Meanwhile large warehouses, with an equal or smaller number of direct jobs that cater to bigger businesses, would be able to build as-of-right. Similarly, non-manufacturing uses like nightclubs, entertainment complexes and restaurants would be able to locate as-of-right. Tow pounds and truck depots would be able to build as-of-right.

We respectfully request that the Council disapprove the text amendment certified on November 1 or any modified text that does not allow for a future for self-storage development. This issue should be set aside until the proper research can be conducted and the proper balances can be struck. Otherwise, the City would be "picking winners" and in doing so, disenfranchising thousands of businesses that rely on self-storage – affordable warehousing – to grow and employ New Yorkers.

Respectfully,



Nunzio Del Greco
President and CEO
Bronx Chamber of Commerce



Linda M. Baran
President and CEO
Staten Island Chamber of Commerce



Thomas Grech
President and CEO
Queens Chamber of Commerce



Andrew Hoan
President and CEO
Brooklyn Chamber of Commerce



Zoning and Franchises Committee Hearing - New York City Council
Self-Storage Text Amendment - OPPOSED
Submitted by Maeve Marcello, Safe N Lock Self Storage
November 20, 2017

My name is Maeve Marcello and I am the Construction Manager at Safe N Lock Self Storage and a resident of the Bronx. I am here today to express my concern and opposition to the proposed text amendment on self-storage in designated areas.

I have been an employee at SNL for more than two years and prior to that, I worked for a steel production company in East New York. As someone who works in the self-storage industry and with a past career in manufacturing, I'm opposed to City Planning's proposal. I understand and agree with the need to support manufacturers in New York City, but I am disappointed in City Planning's approach.

Manufacturing is being squeezed by many factors in New York City. My experience working with the steel company showed me that property leases are not the only issue affecting manufacturers in New York City - taxes, labor costs and general operating costs of being in New York City are all significant drivers of whether a manufacturer can survive.

The need for more housing is squeezing manufacturing, as is retail and hospitality in industrial zones.

Safe N Lock has been an extraordinary career and growth opportunity for me. My job as well as many others are being threatened by this unrealistic proposal in hopes this will promote manufacturing jobs. As I stated before, there are many different issues affecting manufacturing in the city and this proposal will not solve them all.

Furthermore, as a construction manager at SNL, I visit sites under development on a regular basis. I often see sites in under-built parts of the City or distressed areas. Many of these properties were formerly manufacturers that chose to leave New York City. Those buildings are now filled with violations and are a blight on the local community, sometimes unoccupied and on the market for many years.

It is disappointing for the City to attempt to stifle an area of growth. Self-storage is growing because the demand is there and the City's density is increasing – both on the residential and business customer side. This is damaging to working class people and to companies like SNL that are serving a growing need in the City.

I hope City Planning can offer a viable proposal that will allow self-storage and manufacturing to live together in the IBZs.

Submitted by:
Name: Maeve Marcello
Company: Safe N Lock Self Storage
Phone: (646) 780-9133 Email: mm@snlstorage.com

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STUART BECKERMAN
STEFANIE L. MARAZZI

—
BENJAMIN A. STARK
ROBERT HUBERMAN

CAROLE S. SLATER PLLC
RAYMOND LEVIN, LLC
Of Counsel

ELLEN J. HAY AICP
Land Use Consultant
Non-Lawyer

November 13, 2017

Honorable Donovan Richards, Chair, and
Members of the Zoning & Franchises Subcommittee
Council of the City of New York

Re: November 20, 2017 Public Hearing
Application No. N 170425(A) ZRY
Self-Storage Text Amendment

Dear Chair Richards and Council Members:

This firm is special zoning counsel to Safe N Lock Self Storage (“SNL”). We submit this letter in opposition to the self-storage text amendment approved by the City Planning Commission on November 1, 2017 (the “Zoning Amendment”).

The case that self-storage poses a true problem in Industrial Business Zones and hinders opportunities for manufacturers has never been made. Assumptions about impact on real estate values and job creation have been anecdotally referenced by advocates but no quantifiable data has been presented to back these claims.

Even so, SNL has come to the table with amendments to the proposed zoning text that would realistically allow for the construction of new self-storage facilities, an amenity highly in demand in New York City, and would bring new manufacturing space online that correlates with the small batch manufacturing movement in New York City. We have also expressed a willingness to work with partners in the City and the non-profit community to ensure that manufacturing spaces would be occupied. The Zoning Amendment would require that self-storage developers and owners radically transform their business model with respect to both mixed-use construction and property management. The inherent risk involved in relying on a tenant’s rent when a manufacturer may or may not appear is tremendous.

First and foremost, we urge the Council to disapprove the Zoning Amendment in its entirety. Voting down restrictions on self-storage facilities in Industrial Business Zones is warranted by the lack of quantifiable data that self-storage development has a negative impact on the viability of manufacturing development and jobs in IBZ’s. However, if the Land Use Committee of the Council chooses to proceed with a text amendment, we respectfully urge the Committee Members to further revise the text amendment so that it is a viable vehicle for the development of

SLATER & BECKERMAN PC

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November 20, 2017
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both self-storage and new industrial space. In its present form, the text amendment accomplishes neither.

There are major flaws in the Zoning Amendment, including the maximum lot size of 24,999 square feet for “as-of-right” self-storage facilities for which no industrial space will be required; the required set aside in such facilities for larger storage units; and the requirement, on lots 25,000 square feet or greater in size, that industrial space equal 50 percent of lot area.

Given that the average lot size for self-storage is closer to 50,000 square feet, the proposed 24,999 square foot cutoff for as-of-right storage facilities that are not required to include a sizable amount of industrial space means that few, if any, self-storage facilities will benefit from the cutoff. Furthermore, the added requirement for the smaller sites that total floor space of storage units over 100 square feet equal at least 50 percent of lot area does not correlate to the actual percentage of self-storage units across New York City rented to businesses, which is around 30 percent of floor space. While we appreciate the legislative intent to gear self-storage facilities in IBZ’s to businesses over individuals, the proposed codification of floor space of “business-sized” storage units based on lot area would force onto the storage industry an allocation of unit sizes that may not correspond to actual consumer demand.

The requirement, on zoning lots 25,000 square feet or greater, that industrial space equal 50 percent of lot area is a nonstarter for the industry. That requirement, along with requirements for greater floor to ceiling height and for a significant ground floor presence, will scare away investors, private lenders and commercial banks and discourage the development of larger parcels in the IBZ’s.

Additionally, the required findings for the proposed Board of Standards and Appeals Special Permit are ambiguous and open to multiple interpretations.¹ The Zoning Amendment creates a BSA Special Permit to be utilized by self-storage developers who need waivers from the restrictions on self-storage in IBZ’s. Investors in self-storage facilities and developers like SNL will be deterred by the ambiguity in the text of the Special Permit and the fact that there is no way to know with any level of certainty the criteria the Board of Standards and Appeals will apply in determining whether strict compliance with the industrial floor space and “business-sized” storage space requirements of proposed Section 42-121 “will bring a reasonable return.”

Alternatively, we propose a workable self-storage text amendment that would allow as-of-right: (i) on zoning lots 50,000 square feet or less, self-storage, with no industrial set-aside and no restrictions on unit sizes; and (ii) on zoning lots larger than 50,000 square feet, self-

¹ Proposed Section 73-37 provides that, to grant a Special Permit, the BSA must find that the requirements of Section 42-121 (Use Group 16D self-service storage facilities) “create practical difficulties, with no reasonable possibility that a development, enlargement, or conversion on the zoning lot in strict compliance with the provisions of Section 42-121... will bring a reasonable return, and that a reduction or modification of these requirements is therefore necessary to enable the owner to realize a reasonable return from such zoning lot...”

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storage that fully utilizes its floor area ratio, provided that an additional ten percent is set aside for industrial uses.

If the Council determines that self-storage in IBZ's must be regulated, then we offer the following changes to the proposed zoning text, designed to accomplish two goals: one, continue to meet the need of local residents and businesses for conveniently-located self-storage and, two, facilitate the construction of new usable industrial floor space, which is the principal objective of the Zoning Amendment:

- **Allow self-storage as-of-right on zoning lots no larger than 50,000 square feet.** The Environmental Impact Statement ("EIS") indicated that certain lots may be too small to attract manufacturing companies to build new industrial space. Therefore, it would make sense for the prohibition on as-of-right self-storage establishments to apply only to zoning lots greater than a certain size. We propose 50,000 square feet as the cutoff because, according to the EIS, the average lot size for the new construction of self-storage facilities is 49,500 square feet. This way, approximately half the potential development sites will remain available for as-of-right development of self-storage use, with no mixed use requirement. To ensure that self-storage facilities meet the needs of the local market, there should be no restrictions based on the size of storage units.
- **For zoning lots greater than 50,000 square feet, allow self-storage as-of-right, subject to a requirement that an additional 10 percent in floor area be set aside for industrial uses.** Although the total FAR will exceed by 10 percent the maximum permitted by the underlying district regulations for commercial and manufacturing uses, such FAR will be substantially less than is allowed for certain as-of-right community facility uses, such as Use Group 4 ambulatory diagnostic or treatment health centers in all M districts (except M-6). Also, from an environmental scope standpoint, the traffic and other impacts for self-storage facilities are significantly less than for most other conforming commercial and manufacturing uses.

Please note that, without the right to develop 100 percent self-storage on zoning lots of 50,000 square feet or less, it is unlikely that the mixed-use buildings on the larger lots will ever be developed. SNL is in the business of developing self-storage facilities. It has no experience developing other uses. SNL, like any other business, needs certainty of outcome and a minimum of risk. To remain in business, SNL needs to know that it may continue to develop 100 percent self-storage on most of the sites it develops, in order for SNL to assume the risk of developing a mixed-use building.

In conclusion, we respectfully request that the Council disapprove the Zoning Amendment or, in the alternative, consider modifications that will genuinely abet the creation of new industrial space, as well as assuring that the need of local residents and businesses for self-storage continues will be met. It is better to get it right - as passing the Zoning Amendment,

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Zoning & Franchises Subcommittee

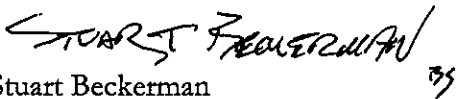
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without modifications, will almost definitely result in the loss of jobs in the self-storage industry and other businesses that rely on affordable warehousing that cannot be found elsewhere.

Thank you for your consideration of our concerns and suggestions.

Respectfully submitted,


Stuart Beckerman

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Non-Lawyer

November 20, 2017

Public Hearing on Self-Storage Text Amendment

New York City Council

ULURP No. N170425 (A) ZRY – OPPOSED

Submitted by Benjamin Stark, Esq., counsel to Safe N Lock Self Storage

My name is Benjamin Stark from Slater & Beckerman PC. I represent Safe N Lock Self Storage.

As many of you are aware, for months we have worked with the Department of City Planning, policy makers, and other stakeholders to craft an amendment to the Zoning Resolution that would both [1] support the primary purpose of Industrial Business Districts: to retain existing, and grow the City's base of, competitive manufacturing and industrial employers, and [2] sensibly allow for the continued development of self storage facilities in the City of New York. Regretfully, we have not yet found that balance.

To date, no true quantifiable data has been presented demonstrating that the development of self-storage facilities in IBZs has had either (1) a negative impact on the viability of existing manufacturing and industrial employers, or (2) a "chilling effect" on the development of new, or the expansion of existing, facilities for manufacturing and industrial employers. In short, the Department of City Planning and the various organizations advocating for a restriction on the development of self storage have yet to draw any direct correlation between the development of self storage and a negative impact on the City's manufacturing base.

We think the inability of City Planning and other advocates to demonstrate this negative impact on the City's manufacturing base is highly problematic, especially considering the gravity of this proposal. Ultimately, we feel that **any restriction on self storage development won't actually help the City's manufacturing base.**

It is for this reason why we feel strongly that the real value of this Zoning Amendment process will be finding the "sweet spot" where the continued consumer demand for self storage can be used to leverage the development of new manufacturing space, allowing existing manufacturers in the City to expand, and new manufacturers to set up shop. That's the outcome-oriented goal we should all be working toward, and we're grateful that City Planning and other stakeholders have stepped up to the plate to have this constructive conversation.

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November 20, 2017

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However, as currently drafted, we are not there yet. We've made it clear to City Planning that the requirement, on zoning lots 25,000 square feet or greater, that industrial space equal to 50 percent of lot area be provided, is a nonstarter for the industry. Given that the average lot size for self-storage is closer to 50,000 square feet, that minimum lot size requirement, along with the requirement to provide a significant ground floor industrial presence, will scare away investors, private lenders and commercial banks, and ultimately discourage the development of larger parcels in the IBZ's. In short – our client, and developers like them, cannot make the numbers work. They will not break ground, and therefore, they will not construct new manufacturing or industrial space.

I would add that the Zoning Amendment's "relief mechanism" – a special permit at the Board of Standards and Appeals to waive these requirements – does nothing to ensure the viability of self storage development in the IBZs. Considering the existing business model of self storage financing, development, and profit outlook, the findings for the BSA special permit are simply too ambiguous, too qualitative, to provide self storage investors and lenders the assurance they need to make what is ultimately a leap of faith.

Therefore, we propose a workable self-storage text amendment that would allow as-of-right: (i) on zoning lots 50,000 square feet or less, self-storage, with no industrial set-aside and no restrictions on unit sizes; and (ii) on zoning lots larger than 50,000 square feet, self-storage that fully utilizes its floor area ratio, provided that an additional ten percent is set aside for industrial uses. With these parameters, we will build new manufacturing and industrial space, while continuing to provide the affordable warehouse space that manufacturers and other small businesses have come to rely on: the affordable warehouse space that keeps those businesses, in business.

With that, we respectfully request that the Council disapprove the Zoning Amendment or, in the alternative, consider the modifications we've suggested today. It is not too late to get this right.

Thank you.

Submitted by:

Benjamin Stark, Esq.

Slater & Beckerman, PC

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Written Testimony

Self-Storage Special Permit

New York City Council Zoning and Franchises Subcommittee Hearing

November 20, 2017

Presented by:

Darryl Hollon – Industrial Business Account Manager, Business Outreach Center Network, Inc.

Good morning Chair Richards and members of the Zoning and Franchises Subcommittee. Thank you for the opportunity to testify. My name is Darryl Hollon and I am the Industrial Business Service Provider for the Business Outreach Center Network.

We are here to urge the Zoning and Franchises Subcommittee to change the A-Text version of the Self-Storage Text Amendment back to its original version. While the original proposal would set a solid foundation for protecting the jobs within the Industrial Business Zones, A-Text fails to address the challenge of competing uses, making it harder for industrial and manufacturing businesses to afford to stay in the City. By passing the original proposal the City will establish the future growth of the Industrial Business Zones across New York City as centers for good-paying jobs and common-sense land use policy.

I provide a menu services offered by the NYC Dep't of Small Business Services geared towards the stability and job growth of industrial/manufacturing businesses in the Flatlands-Fairfield and East New York Industrial Business Zones (IBZ) I stand here today as the previous Industrial Business Service Provider (2006 through 2011) for the Flatlands-Fairfield IBZ (FF IBZ) and since March 1, 2017 the current IBSP for the FF IBZ and East New York IBZ.

The 50,200 s/f and 3,600 unit Storage Fox facility at 5601 Foster Avenue in the Flatlands-Fairfield IBZ is a strong example of the displacement storage facilities create for small industrial/manufacturing businesses and one of the defining reasons that a special permit to erect a storage facility in any one of the City's 21 IBZ's is paramount to the preservation and growth of the industrial community as we progress in the 21st Century. Please note I refer specifically to the original special permit that withstood ULURP in its entirety ensuring IBZ industrial/manufacturing sovereignty in their designated areas.

5601 Foster Ave was once 3 locations which included an East 56th Street address and a Preston Court address. The photos attached denote two of the three locations now 5601 Foster Ave. During my previous tenure in the FF IBZ this location housed 2 steel fabricators (on Foster Ave and E56th Street) and a commercial distributor and shipping company on Preston Court. The four companies employed 20 plus living wage jobs for local residents, and most raising a family. A salient point: this storage facility occupying four times the space of the previous tenants only employes 25% on average of the employees the manufacturing/industrial businesses carried. Storage facility jobs are not middle class-living wage income jobs paying about \$25,000 annually; on the other hand, the average wage for a manufacturing job is more than double at nearly \$52,000 and is more likely to provide crucial benefits like health care.

Limiting storage facilities in IBZ's are part of the City's 2015 Industrial Plan to preserve the integrity of the industrial areas. Unnecessary pedestrian foot traffic and higher rents are a few of the unwelcome by-products in industrial areas due to the presence of big box company storage facilities in IBZ's. Requiring by establishing a special permit with stringent guidelines, for storage facilities in IBZ's will disuade the encroachment, of any non-industrial/manufacturing concern in a designated New York City Industrial Business Zone. This is a start! Thank you!





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Written Testimony

Self-Storage Special Permit

New York City Council Zoning and Franchises Subcommittee Hearing

November 20, 2017

Presented by:

Michael Devigne – Industrial Business Program Assistant, Business Outreach Center Network

Good Morning Chair Richards and members of the Zoning and Franchises Subcommittee. Thank you for the opportunity to testify. My name is Michael Devigne and I am the Industrial Business Program Assistant at Business Outreach Center Network.

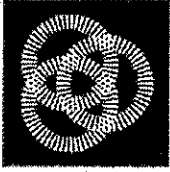
As you may already know our organization is contracted by the city to provide business services to industrial and manufacturing companies throughout East Brooklyn and Central Queens. This is in addition to advocating for the protection of these businesses and the high quality, and relatively well paying jobs that they provide to working class New Yorkers. My colleagues and I are here today to urge the Zoning and Franchises Subcommittee to support the ORIGINAL version of the Self-Storage Text Amendment—not the A-Text.

We argue that the original proposal gave the industrial community a better footing in the city by limiting a specific competing non-productive use in Industrial Business Zones. The A-Text has flipped the original proposal on its head by continuing to allow self-storage as-of-right, and incentivizes self-storage development with density bonuses with no guarantees for affordable industrial space. This is not supportive of Industrial Businesses and their hardworking employees, and it undercuts the ULURP process. The A-Text represents a display of special interests being prioritized over the community's broad support for the original proposal.

If the City passes the A-Text instead of the original proposal the consequences for Industrial Businesses and their working class employees will be dire. The economic environment for industrial and manufacturing in NYC is challenging enough. The A-Text adds to competition for useful industrial space.

Time and time again small food producers and woodworkers, for example, have told me that they would like to expand their operations, but the lack of affordable space in the neighborhood is holding them back. The problem is two-fold—lack of space and lack of affordability. The A-Text will only exacerbate this problem. The argument that self-storage provides a service for small manufacturers and industrial businesses is misguided. It is true that many of these businesses do indeed need additional storage space, but they also need additional space to grow their business. Additional affordable spaces that businesses can lease for expanding their operations, and perhaps storing product and material add a needed element of flexibility.

You can't put a print shop in a storage unit. You can't brew beer in a storage unit, and you can't build furniture in storage unit. In a city where land is scarce we need to ensure that the productive space we have is maintained. Council Members I believe that we need the buildings in our Industrial Business Zones to be economic engines. I request your vote for the original proposal—not the A-text, which would lead to more of the damage we have seen already.



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TESTIMONY

Zoning and Franchises Subcommittee

Zoning, Special permit for self-service storage facilities and to establish
APPENDIX J (Designated Areas in Manufacturing Districts). (N 170425 (A) ZRY)

November 20th 2017

Good Morning Chair Richards and members of the Zoning and Franchises Subcommittee. My name is Aron Kurlander, and I am the Director of Business Services for Greater Jamaica Development Corporation. Thank you for this opportunity to speak before you today. Greater Jamaica has been a frontline, economic development organization with day-to-day contact with manufacturing and industrial firms for 50 years. In that time we have performed on many of the city's local industrial assistance programs including the In-Place-Industrial –Park program (IPIP), Industrial Business Zone program (IBZ) and more recently the Industrial Business Solutions Provider (IBSP) program.

We are here today to urge the Zoning and Franchises Subcommittee to change the A-Text version of the Self-Storage Text Amendment back to its original version.

Our work for industrial and manufacturing firms in Southeast Queens is focused on creating, retaining and attracting jobs to the community. The IBZs of Southeast Queens have seen their best available sites that historically were utilized by industrial firms with significant employment on site, some sites even had hundreds

of employees on site, being repurposed as self storage facilities. Affordable space for job intensive industrial businesses is crucial for our community. Industrial jobs pay on average over \$50,000 a year, over 80% of industrial jobs are held by people of color and most jobs do not require any more than a high school diploma.

The original version of the text amendment provides real protection to IBZs, by limiting as-of-right construction of new self storage facilities unless a special permit was issued. The same can't be said of the A-Text. The new A-Text provides a clear path to as-of-right self-storage, by introducing different development tiers depending on lot size, and actually grants a density bonus for self-storage developers in M1-1 areas. The stated requirement that manufacturing space be included is basically non-enforceable and thereby the A-Text effectively encourages new self-storage development in IBZs.

We request that you please change the self storage amendment back to its original version. The A-Text does not provide the protection our community needs to help preserve and create the well paying industrial jobs that Southeast Queens deserves.

Thank You



Testimony Regarding the Siting of Self-Storage Facilities

By Adam Friedman, Director of the Pratt Center for Community Development

The Pratt Center for Community Development's mission is to build a more equitable and sustainable city. We believe that a vibrant industrial sector is one of the strategies the city needs to pursue to achieve greater economic equity.

We urge you to amend the A Text and go back to DCP's original proposal to require special permits in the IBZs. We've supported use restrictions such as self-storage in the M Zones since 1997 when we released *The Little Manufacturer That Could*. Non-industrial uses not only compete directly displace manufacturers, but equally important, ignite real estate speculation. It is the possibility of easy conversion to offices, to hotels, to big entertainment venues and to self-storage that sets the market price for manufacturing space, not what manufacturers can actually afford.

Two years ago we stood with the Mayor and members of this Council when the Mayor announced a ten point plan to strengthen the manufacturing sector and it appeared the city was going to finally address this issue. One of the commitments in that plan was special permits for self-storage and its implementation, along with special permits for hotels and a study of the North Brooklyn Industrial Business Zone to look at other problematic uses, are now long, long overdue.

We testified in support of DCP's original self-storage proposal at the community boards, before the Borough Presidents and the Planning Commission. In short, we kept our commitment. The criteria could have been stronger but it embodied the essential reform - to discontinue as-of-right self-storage facilities in the heart of the industrial areas.

This essential reform is gone from the A Text Amendment and so we oppose it. The A Text would allow as-of-right, mixed use projects which would both directly displace manufacturers and send exactly the wrong signal to the market. It undermines the entire rationale of the original proposal, which was to curb speculation and provide real estate stability for small industrial businesses. The A Text is a hole big enough to drive a U-Haul truck through.

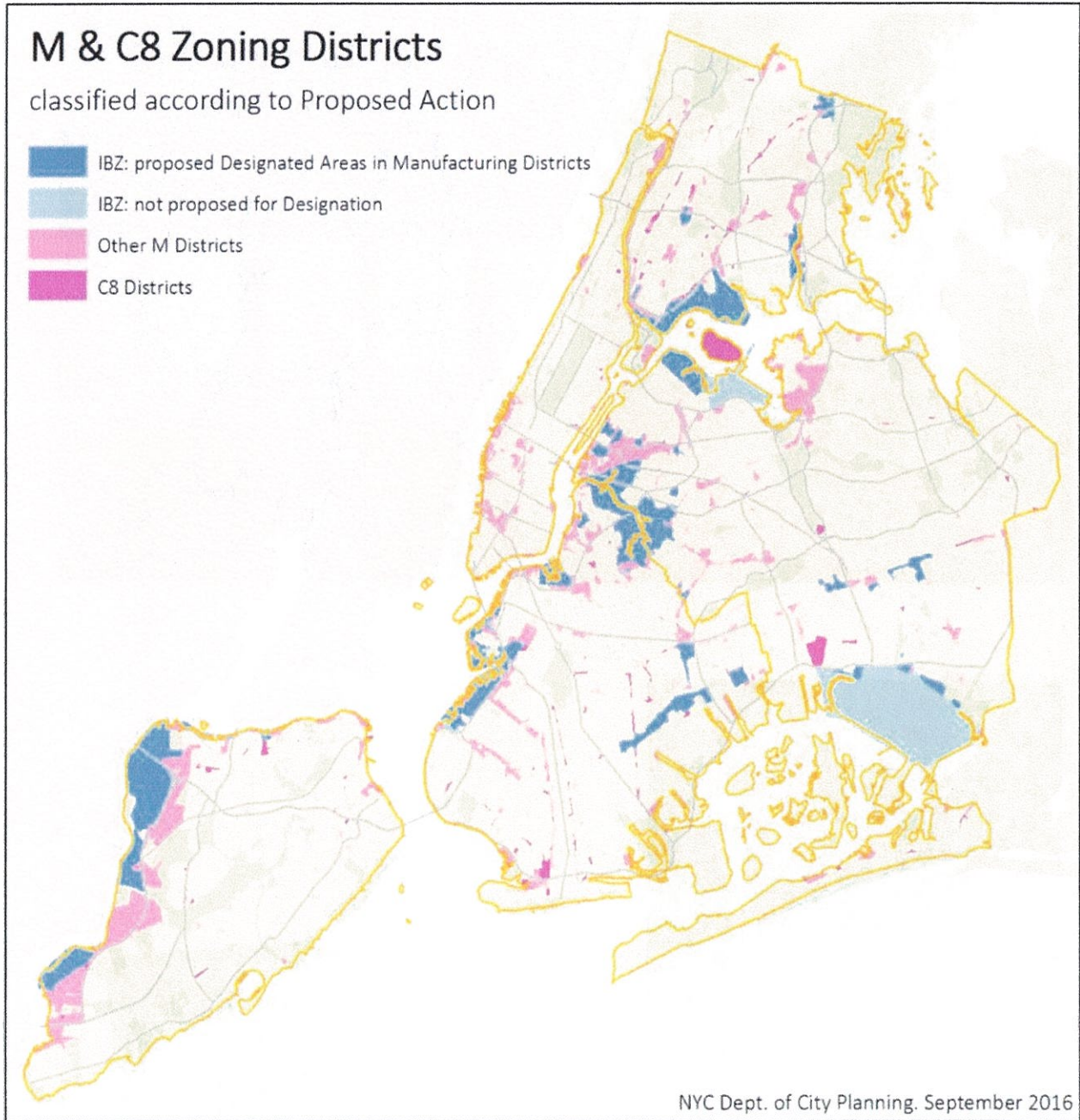
Four quick points about the A Text:

1. Nobody wants the A Text. The self-storage industry has repeatedly testified that it doesn't want to have to become developers and landlords for manufacturers;
2. The A Text is not enforceable. DOB has no capacity to go into the field and issue violations. Even if it did, the fines are so small that they've become merely a business costs;
3. The A Text is not necessary. There are plenty of other areas where self-storage remains as-of-right (see attached map); and
4. The A Text is already obsolete. Perhaps you've seen the signs in the subway – "Self-storage is stupid," promoting pick-up and drop-off storage services.

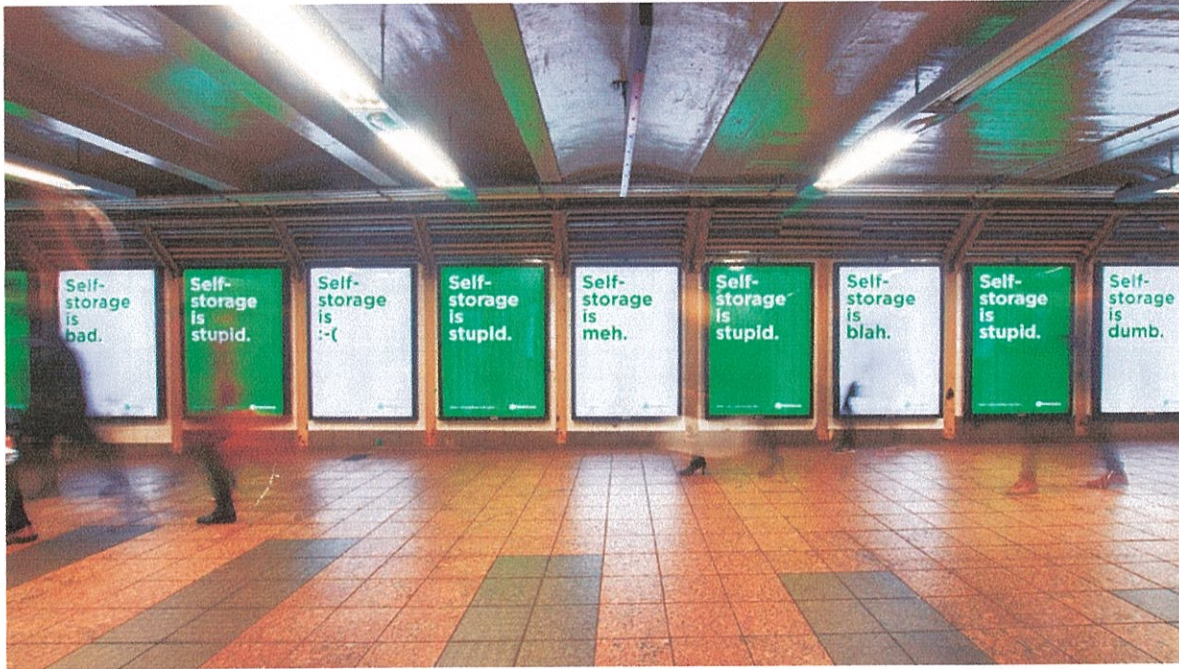
I urge you to amend the A Text and go back to DCP's original proposal, and to do whatever you can to push the Mayor to honor the commitments made two years ago to us and to you to strengthen the city's industrial areas and save well-paying, blue collar jobs.

A Significant Amount Of Land Is Available For Self-Storage

(All but the darkest blue shaded areas are available as-of-right for self-storage.)



The business model for self-storage is changing with development of pick-up and drop-off services. Storage facilities need not necessarily be as accessible in the new model.





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**TESTIMONY OF BARIKA X WILLIAMS
BEFORE THE ZONING AND FRANCHISES SUBCOMMITTEE, REGARDING
THE SELF-STORAGE TEXT AMENDMENT**

November 20, 2017

Good morning Chair Richards and members of the committee. Thank you for the opportunity to testify.

My name is Barika Williams and I am the Deputy Director for the Association for Neighborhood and Housing Development (ANHD). ANHD is a membership organization of NYC- neighborhood based housing and economic development groups- CDCs, affordable housing developers, supportive housing providers, community organizers, and economic development service providers. Our mission is to ensure flourishing neighborhoods and decent, affordable housing for all New Yorkers. We have over 100 members throughout the five boroughs who are working alongside communities to create economic opportunity and developed over 100,000 units in affordable housing.

As part of the Industrial Jobs Coalition, a citywide alliance of policy advocates, community organizations, and service providers, **we are deeply concerned by text amendment-A (A-Text) and strongly support the City's original proposed zoning text amendment to create a special permit for self-storage facilities in the 21 Industrial Business Zones.** The Administration already recognizes that industrial and manufacturing jobs, whose average wages are twice that of the retail sector, are a crucial avenue of opportunity and equitable economic development for communities across the city. At a time when affordability is a citywide concern, the proposed text amendment meaningfully advances that recognition into action. **Use group reform, especially in the City's 21 Industrial Business Zones, is necessary to ensuring access to good paying jobs across all five boroughs.**

The Council has a crucial decision it must make: Will it strengthen our city's core industrial areas with meaningful zoning protections, or will allow the industrial and manufacturing sector to continue to be outbid by more lucrative uses? While the proposal today is focused on self-storage, this proposal will set for use group reform moving forward in all five boroughs.

Need for Use Group Reform

The original proposal, which restricts self-storage via a special permit, creates a solid foundation upon which we can continue to strengthen the Industrial Business Zones and create more space for good-paying jobs. On the other hand, the A-Text will exacerbate the speculative market forces that have made it increasingly difficult for manufacturers to stay in the City, leading to a loss of the jobs that could make us a more equitable city.

By restricting self-storage in the Industrial Business Zones on a special-permit basis, the City is taking a crucial step in ensuring that manufacturing zoned land continues to be used for this purpose. **Because of overly broad use groups, speculation has driven up rents in M-zone land, making it harder for manufacturing tenants to stay in the city.** Additionally, while self-storage facilities attempt to characterize their existence in Industrial Business Zones as complimentary to small manufacturers, their as-of-right status puts them in direct competition with manufacturers, leading to an increase in real estate costs. By reducing speculation and creating an appropriate form of local oversight, the originally proposed special permit rightfully works to address these challenges for the city's manufacturers.

The proposed zoning action is distinct because, for the first time, the City is mapping the Industrial Business Zones in actual zoning. Currently, the Industrial Business Zones exist solely for tax purposes. There is no zoning distinction between M-zones inside or outside of IBZs. The original proposed action puts zoning into the Industrial Business Zones. **The Industrial Jobs Coalition supports the original proposal because it establishes a solid foundation for much-needed**



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broader use group reform in core industrial areas. The Administration, City Council, and advocates like the Industrial Jobs Coalition have long acknowledged that there are incompatible uses that should be restricted within the very broad M-zone use groups. By mapping the Industrial Business Zones through this specific zoning action, the City is ensuring manufacturing areas are actually used for this job-dense use.

The A-Text Undermines the Industrial Action Plan

Given the City's own stated goal to establish space for job-dense industrial and manufacturing uses, we are deeply concerned about the A-Text version of the Self-Storage Text Amendment released on August 3, 2017. The changes that have been introduced since the August 3 version have done nothing to address these concerns. Rather, they heighten our concerns. From both a policy and a political perspective, this proposal poses serious problems. **For these reasons, we are strongly opposed to the A-Text.**

At its heart, the A-Text maintains the as-of-right status of self-storage in Industrial Business Zones, a direct undermining of the use group reform promised as part of the Council and Administration's Industrial Action Plan. Only by following the approach of the original proposal, where self-storage is limited via special permit in the Industrial Business Zones, can there be any kind of foundation for use group reform in the future.

The A-Text is a drastically different proposal from the original proposal. The original proposal would create a requirement for a special permit in the "M-designated districts". That's it. The A-Text creates a mixed-use model within these M-designated districts for self-storage to be mixed with 20,000 sf of what is being termed "ground floor industrial" space. It is difficult to understand how the City decided to present such a proposal when it was in fact the City that recognized the low job-density at self-storage facilities. **If the goal is to create space for job-dense uses, it's puzzling as to why the City would develop a mixed-use model for such a low job-generating use.**

The special permit in the A-Text, rather than apply to a competing use in core industrial areas, is now to reduce or waive the requirement for ground floor industrial uses. In addition, in M1 areas, the required industrial space does not count towards a development's maximum floor area ratio, essentially granting self-storage developers bonus density for industrial space they are under no requirement to fill. These same developers could apply for a variance to use this additional space for self-storage beyond that of what they would otherwise be able to do, resulting in no new industrial space. **These mechanisms, rather than ensure the development of new industrial space in the Industrial Business Zones, make it easier for developers to avoid doing so.**

None of the new terms or mechanisms in the A-Text were discussed at the community board or borough president level. This raises a crucial question: **Who supports the A-Text?**

What Foundation Are We Setting?

Ultimately, we must consider the precedent being set by this application. This application began from the Administration's goal of strengthening the core industrial areas. While both the original and A-Text proposals are part of this ULURP, only the original proposal serves to fulfill this goal.

We support the City's effort to use zoning to bolster this engine of economic opportunity. The zoning reforms outlined by the 10-Point Industrial Action Plan are crucial to the success of the industrial and manufacturing sector. At this juncture, the City Planning Commission has the opportunity to approve the original proposal and work towards that success or approve a proposal that does more harm than good for the sector. **We urge you to approve the original proposal and support the Administration's goal of creating space for more good-paying industrial and manufacturing jobs.** Thank you for the opportunity to testify.

Why does the proposed self-storage special permit matter?

The City recently certified a land-use proposal to limit self-storage development in core industrial areas. This step forward is a significant victory for City Council members and community groups that care about a progressive industrial policy that promotes quality jobs and equitable economic development. But the self-storage industry association is pushing back, and we have to make sure that we keep the momentum to win this important step forward.

With speculation and rising real estate costs in industrial areas making it harder for manufacturing tenants to stay in the city, it is crucial for this proposal to move forward. Advocacy from communities and within the City Council ensured the Mayor would include use group reform as part of his 2015 Industrial Action Plan, and this same advocacy will ensure this commitment is fulfilled.

Here are 5 key facts to remember as the proposal moves forward:

1. Industrial and manufacturing jobs are good paying jobs.

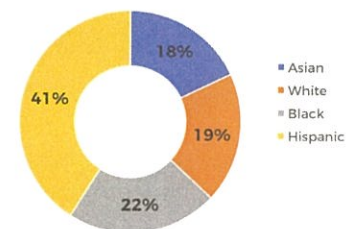
The industrial and manufacturing sector has historically played a key role in creating a robust working middle class. While the sector has changed since its peak in the middle of the 20th century, wages remain strong. Average wages in the industrial sector are over \$50,000 a year, significantly more than average wages in retail or food service¹. In a city where affordability is a constant challenge, retaining the kinds of jobs that allow people to stay in the city is crucial to an equitable economic development strategy.



2. The majority of industrial and manufacturing workers are immigrants and people of color.

In terms of who receives these wages, the demographic breakdown of the sector presents a diversity that mirrors New York City as a whole. With a majority of workers foreign-born and over 80% of workers being people of color, the industrial and manufacturing sector provides access to good paying jobs while often not requiring a college degree².

Industrial Workforce by Race/Ethnicity
US Census, American Community Survey 2012



Nearly 1 in 7 Hispanic New Yorkers who work have jobs in the industrial sector.

3. The proposed special permit begins tackling the broader displacement of good paying jobs from New York City.

A major challenge to the sector has been the commercialization of industrial-zoned land. The Council's Engines of Opportunity report recognized the "continued pattern of speculation and warehousing...and lack of suitable zoning³." The overly broad use groups have allowed competing uses to displace industrial businesses and workers, leading to a loss of jobs. The Administration's Industrial Action Plan aimed to address this challenge by limiting self-storage and hotel uses via a special permit⁴.

1. New York City Council, Engines of Opportunity, Page 22. <http://council.nyc.gov/land-use/wp-content/uploads/sites/53/2017/05/Engines-of-Opportunity-Full-Report.pdf>
2. Ibid.
3. Ibid., 20.

4. There is considerable space available for self-storage.

The proposed special permit for self-storage only applies in “designated M-districts,” areas which largely overlap with the City’s existing core manufacturing areas – the Industrial Business Zones – as shown in the map on the left⁵. In other words, new self-storage storage facilities will still be permitted as-of-right in C8 and M zones outside of the “designated M-districts”, as shown in the map on the right⁶. Additionally—while the self-storage industry’s model is still rapidly evolving in terms of space needs—industrial and manufacturing businesses, supporting local supply networks, locate and operate in the city as a matter of necessity.

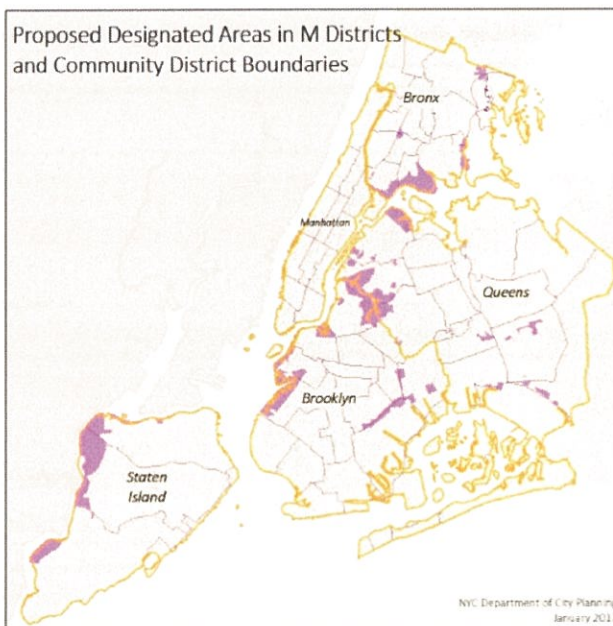


Figure 10: Proposed Designated Areas in M Districts

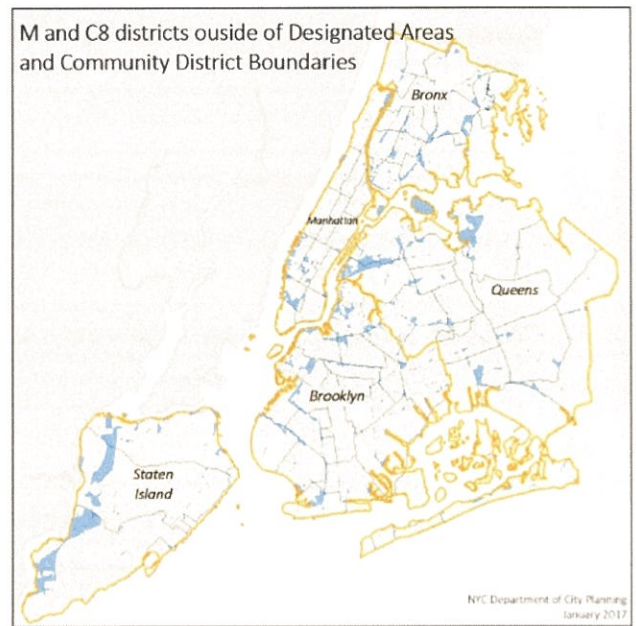


Figure 12: M and C8 districts outside of Designated Areas

5. When space is preserved for manufacturing, those jobs stay in the city.

If manufacturers are less concerned about being priced out of their neighborhood, they are able to focus their attention back into running their business, whether through investing in new equipment or scaling up and hiring more employees. Manufacturers have been pushed out of the city due to rising real estate prices, but there has been continuous demand for affordable industrial and manufacturing space. The City has recognized this challenge, launching the non-profit Industrial Development Fund to address this gap and keep more jobs in the city.

To partner with us on advancing progressive industrial policy, contact the Industrial Jobs Coalition:

Association for Neighborhood and Housing Development – Business Outreach Center Network – Evergreen: Your North Brooklyn Business Exchange – Fifth Avenue Committee – Greenpoint Manufacturing and Design Center – Neighbors Helping Neighbors – Ridgewood Local Development Corporation – Pratt Center for Community Development – South Bronx Overall Economic Development Corporation – Southwest Brooklyn Industrial Development Corporation – Staten Island Economic Development Corporation

4. Industrial Action Plan. <http://www1.nyc.gov/office-of-the-mayor/news/780-15/mayor-de-blasio-speaker-mark-viverito-action-plan-grow-21st-century-industrial-and/#0>

5. NYC DCP, Environmental Assessment Statement: Self-Storage Text Amendment, Page 31.

6. Ibid., 34.

What's Wrong with the City's Self-Storage A-Text?

Since launching the City certified a proposal to limit self-storage in core industrial areas, pressure from industry groups has distorted a necessary reform for Industrial Business Zones into a giveaway for self-storage developers. While framed as a compromise, this new "A-Text" is anything but.

Here are five key problems with the City's proposed A-Text:

1. The A-Text prioritizes space for stuff over space for jobs.

We need to strengthen our core industrial areas is to ensure that the good jobs manufacturing creates stay in the city. If we're interested in creating equitable economic development, we should be preserving and growing more opportunities for manufacturers to be in New York. The A-Text does not do this. The A-Text approach is to provide some space for manufacturing in new self-storage developments in Industrial Business Zones. Rather than draft zoning language to preserve a status quo that ensures a place for people's stuff, the City should adopt language that will prioritize the need for good jobs in our core industrial areas.

2. The A-Text runs against communities' broad support for the original proposal.

A key part of the Uniform Land Use Review Process (ULURP) is the weighing of support (or opposition) of local communities. 27 community boards would be directly impacted by the self-storage proposal. On the original proposal, 14 voted in favor, while only 4 voted in opposition (9 community boards made no recommendation). None of them voted on the A-Text as it was introduced after their part of the ULURP process.

Community Board Support For Original Proposal

14

in favor

4

in opposition

3. The A-Text sets a terrible precedent for protecting core industrial areas.

This proposal is about much more than self-storage. The original proposal creates, for the first time, zoning protections for the city's 21 Industrial Business Zones.¹ It would effectively restrict a competing use and lay the foundation for future use restrictions. By contrast, the A-Text - if enacted - would put a bullseye on the Industrial Business Zones and demonstrate that industry interests can undermine even the City's own stated policy goals. It is up to the City to set the right precedent.

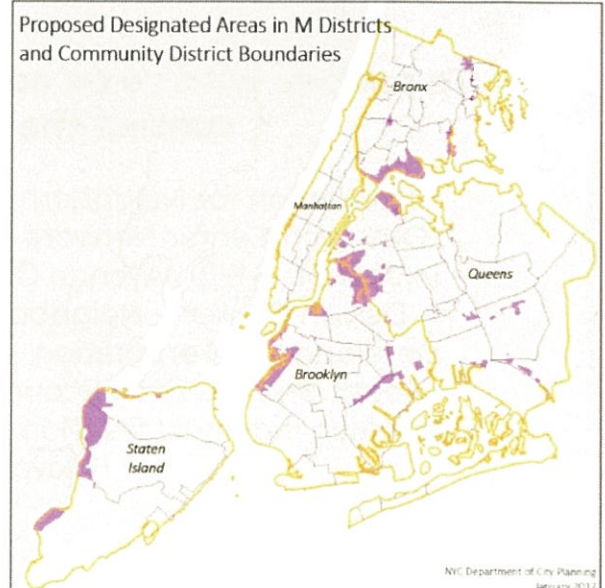


Figure 10. Proposed Designated Areas in M Districts

1. NYC DCP, Environmental Assessment Statement: Self-Storage Text Amendment, Page 31.

4.

The A-Text doesn't limit self-storage development; it caters to it.

The framework of the original proposal to limit self-storage was through a City Planning Commission (CPC) special permit that would be applied in the Industrial Business Zones. It was clear how self-storage was being limited - direct community oversight. The same can't be said of the A-Text. It continues to allow self-storage as-of-right, introduces different development tiers depending on lot size, and actually grants a density bonus for self-storage developers in M1-1 areas. The fact that there are ways for self-storage developers to follow the A-Text precisely and end up with zero industrial space demonstrates just how far we've come from the original proposal. The priorities have been flipped.

5.

The A-Text runs counter to the Administration's own Industrial Plan.

In 2015, the de Blasio Administration and the City Council announced a 10-Point Industrial Action Plan. The second pillar of that plan was land use and zoning: "Limit New Hotels and Personal Storage in Core Industrial Areas to Reduce Use Conflicts and Support Diverse Economic Growth". The Administration itself noted that self-storage "facilities do not create a high number of jobs and thus do not align with the Mayor and Council's vision for economic development in core industrial areas."²



To partner with us on advancing progressive industrial policy, contact the Industrial Jobs Coalition:

Association for Neighborhood and Housing Development – Business Outreach Center Network – Evergreen: Your North Brooklyn Business Exchange – Fifth Avenue Committee – Greenpoint Manufacturing and Design Center – Neighbors Helping Neighbors – Ridgewood Local Development Corporation – Pratt Center for Community Development – South Bronx Overall Economic Development Corporation – Southwest Brooklyn Industrial Development Corporation – Staten Island Economic Development Corporation

Self-Storage Text Amendment – 11/20/17 Subcommittee on Zoning and Franchises

Comments of Jon Dario, New York Self Storage Association

My name is Jon Dario, and I'm the Vice-Chair of the New York Self Storage Association. The NYSSA is a state organization made up of several hundred developers, owners and operators of self-storage facilities, including those in New York City.

Although the Department of City Planning has described the proposed zoning text amendment as an effort to increase industrial uses in the IBZs; this proposal is based on flawed assertions. The proposed restrictions on self-storage are arbitrary and are not based on any study or empirical evidence showing that self-storage has any detrimental effect on the siting of industrial uses. This proposal is an effective ban on self-storage facilities on the majority of currently-available development sites in the City.

Current zoning already limits where self-storage can locate. The proposal would eliminate almost half of the land where self-storage could be built. The proposal imposes a generic zoning framework to nearly 5,000 acres of land in the Bronx, Brooklyn, Queens, and Staten Island. It is overly broad with little to no consideration of the specific conditions and needs of individual areas across the four boroughs.

Self-storage facilities play a critical role in supporting businesses and various other users in this city. They provide affordable and flexible storage options for businesses, residents, nonprofits, local service providers and cultural groups. New Yorkers live and work in small spaces, and they need the extra room that self-storage provides. Banning self-storage would only constrain the supply of self-storage, causing prices to rise and thereby hurting all users.

The proposal would significantly harm the self-storage industry, which is something that even City Planning's Draft Environmental Impact Statement acknowledged. This is especially troubling given that no data has been provided that shows that self-storage negatively impacts industrial businesses.

The proposed zoning is ultimately flawed and should not move forward at all in any form.

Over the course of the public review process, the City Planning Commission adopted modifications to the original proposal that was certified. Under the City's environmental review regulations, we believe that City Planning had an obligation to consider alternatives that would mitigate the identified impact on the self-storage industry. The current proposal was adopted by the City Planning Commission in an attempt to partially mitigate the devastating impact this proposal would have on the self-storage industry.

However, the current proposal fails to mitigate the significant impact on the industry and won't help industrial businesses. The proposed zoning fails to acknowledge the economics and logistics of self-storage development, and it runs the risk of preventing the construction of new self-storage space and its accompanying new industrial space.

The following issues highlight some of the shortcomings of the proposal.

- The Industrial Space requirement should be applied to lots great than or equal to 50,000 SF. The requirement to provide Industrial Floor Space for zoning lots greater than or equal to 25,000 SF would not allow for a feasible development program for mixed-use buildings. Therefore, no new industrial space would be created.
- The Industrial Space requirement must be reduced substantially to support the development of any self-storage facility on a larger zoning lot. The requirement to provide 50% of zoning lot area as Industrial Floor Space would make most projects on large zoning lots infeasible.
- The Industrial Space should not be restricted to floors below the third story. This unnecessarily hinders the design of mixed-use buildings for and restricts flexibility in accommodating the varying needs of varying types of potential users of the Industrial Space.
- The zoning floor area exemption for providing Industrial Space should reflect the Industrial Floor Space required and provided. It should not be arbitrarily capped at 20,000 SF. The exemption should also apply to all impacted zoning districts, not just M1-1 districts. Limiting the exemption to M1-1 districts and to 20,000 square feet is arbitrary and does not provide suitable balance to the proposed requirements.
- The required minimum size of "business-sized" units must be reduced to 50 square feet and a height minimum of 8 feet should be eliminated. This would support business users with larger-container-size requirements while not destroying the self-storage business model.

The current 100 square-foot requirement is larger than the vast majority of all units in the average self-storage development. This size bears no resemblance to the size of units actually used by business users, is contrary to the self-storage business model, and appears completely arbitrary.

- The requirement to provide 50% of zoning lot area for business-sized units should be reduced to allow for more feasible development.

In closing, we urge the Council to vote against this proposal in its entirety, as there has been no study that backs up its premise or demonstrates its effectiveness. Short of that, we believe the Subcommittee has an obligation to modify the text to mitigate the significant adverse impacts to the industry and better meet the goals and objectives of the proposal. A zoning restriction that doesn't achieve its goals and negatively impacts an industry that helps businesses is not sound.

**THE COUNCIL
THE CITY OF NEW YORK**

East
River Fiftee

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Michael Stattery

Address: 570 164 Ave

I represent: Real Estate Board of New York

Address: 570

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. ERFA Res. No. _____

in favor in opposition

Date: 11/20/17

(PLEASE PRINT)

Name: GARY K TARNOFF

Address: 1177 AVENUE OF THE AMERICAS

I represent: GAMMA / SUTTON SP

Address: _____

**ERFA THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. ERFA Res. No. _____

in favor in opposition

Date: 11.20.17

(PLEASE PRINT)

Name: JONATHAN KALIKOW

Address: 201 PARK AVE

I represent: GAMMA REAL ESTATE

Address: 101 Park Ave

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

ERFA

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 11/19/17

(PLEASE PRINT)

Name: Jim Gras

Address: _____

I represent: Manhattan Bow Pres

Address: _____

EAST RIVER 50's **THE COUNCIL** 1130
Sergeant-at-Arms

THE CITY OF NEW YORK

Appearance Card

1

I intend to appear and speak on Int. No. 1130 Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: SANDY HORNOK

Address: 142 PARK PLACE BROOKLYN NY 11217

I represent: East River Fifties Alliance

Address: _____

Please complete this card and return to the Sergeant-at-Arms **THE COUNCIL** 11:30
Sergeant-at-Arms

THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Karen Meara Carter Lady d's Millham

Address: 2 Wall St.

I represent: Applicants for East River Fifties Text Annual

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

6977

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Senator Liza Krueger

Address: 211 East 93rd Street NYC 10017

I represent: NY State Senate

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

11:30

I intend to appear and speak on Int. No. ERFA Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Jeff Mulligan

Address: Kramer Lawn

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

11:30

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 11/20/17

(PLEASE PRINT)

Name: ROBERT SHEPLER

Address: 435 EAST 57th Street

I represent: _____

Address: _____

11:30 am
THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 11/20/17

(PLEASE PRINT)

Name: Elizabeth Fagan

Address: 966 Lexington Ave, #3E, NYC 10021

I represent: FRIENDS of the Upper East Side Historic

Address: 966 Lexington Ave, #3E, NYC 10021 Districts

11:30
THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 11/20/17

(PLEASE PRINT)

Name: Robert Joseph

Address: _____

I represent: Municipal Art Society of NY

Address: _____

11:30
THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

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I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Jessica Osborn

Address: 425 E. 58th St., NY, NY

I represent: EAST RIVER Fifties Alliance

Address: 206 E. 42nd St., NY, NY

THE COUNCIL
THE CITY OF NEW YORK

11:30am

Appearance Card

[Empty box]

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 11/20/17

(PLEASE PRINT)

Name: David Leeds

Address: 179 E 80th St. #21A, NY, NY 10075

I represent: Rep. Carolyn Maloney (NY-12)

Address: 1651 3rd Ave. Ste 311 NY NY 10029

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THE CITY OF NEW YORK

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11:30

Appearance Card

[Empty box]

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Anthony Austin

Address: 930 THIRTIETH AVE #121

I represent: LEAD LEASE

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Please complete this card and return to the Sergeant-at-Arms

Appearance Card

[Empty box]

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Anthony Austin

Address: 930 THIRTIETH AVE #121

I represent: LEAD LEASE

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: Self-Storage

(PLEASE PRINT)

Name: Cheryl Surana

Address: _____

I represent: Brooklyn Centre Company

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Varun Sanyal

Address: _____

I represent: Brooklyn Chamber

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 11/20/17

(PLEASE PRINT)

Name: Varun Sanyal

Address: Brooklyn

I represent: Brooklyn Chamber of Commerce

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Quincy Ely-Cate

Address: _____

I represent: BOC

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Cheryl Surana

Address: _____

I represent: Brooklyn Cooke Company

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Amanda Iyer

Address: _____

I represent: Dept City Planning

Address: 120 Broadway

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. Self-Storage Res. No. _____

in favor in opposition

Date: 11.26.17

(PLEASE PRINT)

Name: Jennifer Gravel

Address: 120 Broadway NYC

I represent: NYC DCP

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. self storage Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Leah Archibald

Address: 2 Kingsland BK NY

I represent: Evergreen

Address: 2 Kingsland

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

self storage
I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 11/20

(PLEASE PRINT)

Name: Joel Moskowitz

Address: 205 Third Ave 10003

I represent: tools for working wood

Address: 112 26th Street, Brooklyn, NY 11232

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. Self-Storage Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Nancy Parra

Address: _____

I represent: BOC

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. Self-Storage Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Nancy Parra
Adam Freedman

Address: _____

I represent: BOC
Pratt Center

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. Self-Storage Res. No. Self-Storage

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Barbara Williams

Address: AT

I represent: ANAD Center

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. Self Storage Res. No. _____

in favor in opposition

Date: 11/20/17

(PLEASE PRINT)

Name: Michael Devigne

Address: 359 Orington Ave

I represent: Business Outreach Center Network

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. Self Storage Res. No. _____

in favor in opposition

Date: 11/20

(PLEASE PRINT)

Name: Ben Margolis

Address: 241 41st Street Brooklyn, NY

I represent: Southwest Brooklyn Industrial Development Corp.

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. Self Storage Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Ben Stark

Address: _____

I represent: Slater Beckerman

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Self-storage Date: Nov 20

(PLEASE PRINT)

Name: Marc Shatin

Address: _____

I represent: SNL Development

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. Self-storage Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Cassandra Smith

Address: _____

I represent: GMDC

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. Self Storage Res. No. _____
 in favor in opposition

Date: 11/20/17

(PLEASE PRINT)

Name: Jon Dario

Address: 520 8th Ave., New York, NY 10018

I represent: New York Self Storage Association

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

Self Storage

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 11/20/2017

(PLEASE PRINT)

Name: James Coakley

Address: 134 W. 29th Street NY, NY 10001

I represent: Treasure Island Management LLC

Address: Same as Above

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Bill Williams

Address: _____

I represent: LDC of ENY

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Sulran Gomez

Address: _____

I represent: Make the Road NY

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Darryl Hollan

Address: _____

I represent: BOC

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: Self Storage
NOV 20

(PLEASE PRINT)

Name: Zach Mashaa n

Address: _____

I represent: RKF (Commercial Broker)

Address: NY, NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: Self Storage
NOV 20

(PLEASE PRINT)

Name: Shahid Mahmood

Address: Bronx, NY

I represent: Delta General Contractor

Address: _____

Self Storage

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

[Empty box]

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Aron Kutander

Address: _____

I represent: Electra Jamaica Development Corp

Address: _____

▶ Please complete this card and return to the Sergeant-at-Arms ◀

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

[Empty box]

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: Nov 20

(PLEASE PRINT)

Name: Maevie Marcelllo

Address: Bronx, NY

I represent: Safe N Lock Self-Storage

Address: _____

▶ Please complete this card and return to the Sergeant-at-Arms ◀