



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

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JOHN WEIS
Chair

ROBERT J. BENFATTO, JR., ESQ.
District Manager

June 11, 2010

Hon. Amanda M. Burden, Director
New York City Department of City Planning
22 Reade Street
New York, NY 10007-1216

Re: Application No. N 100284 ZRY – Car Share Zoning Text Amendment

Dear Director Burden:

On the recommendation of its Chelsea Preservation and Planning committee, Manhattan Community Board 4 voted at its meeting on June 2, 2010 to recommend the conditional approval of the application for a Zoning Text Amendment creating regulations governing the parking of car share vehicles.

The proposed amendment modifies various provisions of the Zoning Resolution to facilitate the siting of commercial car sharing operations in accessory and public parking facilities in residential, commercial and manufacturing districts. This effort is intended to support other city policies to improve the transportation network, and reduce energy consumption and carbon emissions. While CB4 generally supports efforts to restrict parking and to reduce vehicular traffic, we have concerns about the proposed amendment.

Our greatest concern is security in residential buildings, especially buildings with unattended parking or buildings with attended parking where residents walk to their cars. Currently, residents reasonably assume that people in their garages are either attendants or fellow residents. Siting shared cars in these garages introduces outsiders with no connection to the building other than the shared car, with the potential for unauthorized access to residential buildings. We are particularly concerned that in order to fulfill the 24/7 requirement owners would reduce existing restrictions such as access to parking lots only through locked gates opened by owner key. We recommend that the amendment state clearly that provisions for car sharing in residential accessory parking garages must include measures ensuring the security of the garage and the residents, and that such measures be subject to review and enforcement.

We also note that an outsider would have an opportunity to introduce dangerous materials into a building in a returned car. While this is currently the case with public parking facilities, the proposed amendment will increase the risk at many more residential buildings. We recommend that the proposed amendment be reviewed by the New York Police Department.

While we support the general goal of reduced car use, we are concerned that the proposed amendment will create a sufficiently strong incentive for landlords to convert spaces to car sharing that they will do so rapidly and without regard to displacing residents who currently own cars. In the case of residential off-street accessory parking we are concerned that residents may

not know that they are entitled to a parking space, and that there will not be adequate enforcement of the requirement that a space be made available to a resident on demand. We recommend that the last sentences in Section 25-412 and in Section 36-46 mandating that spaces be made available to residents on demand be accompanied by a provision, perhaps in Section 22-30, "Sign Regulations," requiring that a sign to that effect be posted in plain sight, perhaps adjacent to any sign advertising a car sharing facility as provided for in Section 22-323.

Many of our area residents live in buildings without parking and use public parking garages and public parking lots for their vehicles. We believe that permitting 40% of the spaces in these garages and lots to be converted to car sharing spaces could lead to the rapid displacement of many of our area residents. We recommend that the limit be set at 20% initially and then reviewed periodically as data on usage and displacement are collected. We also request clarification on how the number of permitted spaces in garages with both accessory and public parking will be calculated.

Finally, in presenting the case in support of car sharing the description of the proposal cites results of a longitudinal study of car sharing in the San Francisco Bay Area and a report published by the Transportation Research Board of the National Academy of Sciences. The latter report cites studies from around the world, and in the United States from Portland, OR, San Francisco, CA and Alexandria, VA. While we welcome such studies, we are skeptical of their direct applicability to New York City with its density, mix of building types and its public transportation network. The description reports that even though car sharing in the US began on the west coast in 1998, New York City is the largest car share market, with a greater than 33% share. We wonder why there is no study available on the impact of car sharing on the largest market in the country. We hope that the proposed amendment, which is an effort to regulate an existing reality, will lead to data useful for improving both car sharing in New York City and the proposed amendment to regulate it.

Sincerely,



John Weis, Chair
Chelsea Preservation and Planning



J. Lee Compton, Co-Chair
Chelsea Preservation and Planning

[signed 6/11/10]

Corey Johnson, Co-Chair
Chelsea Preservation and Planning

cc: NYC Council Speaker Christine Quinn
Manhattan Borough President Scott Stringer
Congressman Jerrold Nadler
NYS Senator Thomas Duane
NYS Assemblyman Richard Gottfried