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CITY OF NEW YORK **MANHATTAN COMMUNITY BOARD No. 4**

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ANTHONY M. BORELLI

WALTER MANKOFF

Chair

District Manager

May 16, 2005

Hon. Amanda Burden Chair City Planning Commission 22 Reade Street New York, NY 10007

Re: Application No. C 040473 Public Parking Garage at 155 West 21st Street

Dear Chair Burden:

The applicant gave a presentation on the proposed public parking garage at 155 West 21st Street at the Chelsea Preservation and Planning Committee meeting on April 18, 2005, and later at a duly noticed public hearing held immediately before the regular meeting of the Community Board on May 4th. The Board voted to disapprove the application: 27 in favor, 5 opposed, 1 abstaining and 0 present but not eligible to vote.

The proposed 83-space garage will replace a parking lot on the site holding 35 vehicles that was earlier used for years as a taxi base. The applicant stated at Board meetings that the proposed garage is expected to serve mainly the occupants of the building and the former users of the lot.

However, the Board is deeply concerned that approving this garage will tend to draw cars into this heavily-trafficked area of Manhattan and would adversely affect the quality of the neighborhood. We believe that the application fails to meet the findings required in Z.R. Section 74-52 because it mischaracterizes neighborhood conditions and because it relies on traffic projections that may be flawed.

The application mischaracterized the area as "commercial in nature". Land use patterns and zoning in this area show that it is densely residential, especially the area to the west of the proposed garage. Commercial uses on the 100-block of 21st Street, and on other blocks between Sixth and Seventh avenues, typically occupy ground floor spaces of buildings with residential uses above. To the east of the proposed garage, only the Sixth Avenue shopping corridor shows a strong continuity of commercial uses, yet even here large apartment buildings provide a significant residential presence. The application further states that the area "not characterized as a local residential neighborhood", despite prevalence of residential uses in this area and Chelsea's reputation as a desirable place to live.

West 21st Street, like many others in the area, is frequently blocked by traffic. The many taxis based in a large taxi garage on the block and regularly parked along the street cause further congestion. Reaching the garage from the north, as is clear from the application, will require driving through several other congested streets in the neighborhood. The impacts of the garage will not be confined to this block alone but to the increasingly residential blocks nearby. Any increase in traffic would have a serious impact on congestion and the resulting air and noise pollution.

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The application indicates that new parking spaces are intended to "accommodate parking for more visitors to the busy shopping and entertainment hubs existing along the area's Avenues" and would serve 'ground floor retail and services along the area's side streets by providing parking for their patrons". The application does not indicate how many spaces would be dedicated for use by residents living in any of the new 109 units above the garage. Clearly, the intention of the garage is to primarily serve an increased number of transient users from outside the neighborhood, not local residents.

The application claims that the parking garage will replace "an existing 35 space public parking lot" and would serve "current users... who would otherwise be displaced". Contrary to the applicant's claim, the site of the garage previously served as parking lot for taxis, not as a public parking lot. The application's traffic projections were based on the increment of 48 new spaces and show that the new garage would generate approximately 30 new vehicles trips per hour. But the new garage is the equivalent of 83 new spaces and may generate as many as 48 trips per hour – very close to the significance level adopted by the CEQR manual.

The applicant's claim that "a public parking garage would reduce future loss of area parking through residential development of area parking lots" does not recognize that surface parking lots are almost always interim uses. Parking facilities for transient users are neither vital nor essential to success of the Chelsea neighborhood where residential uses are rapidly replacing most of the commercial uses that formerly depended on the parking lots in the area.

While there will clearly be adequate reservoir space, the two-lane entrance/exit and the apparent configuration of the first basement suggest that the future operator of the garage may yield (as many operators do) to the infrequently resisted temptation to stash a number of cars in excess of the legal capacity in these spaces. This is likely to increase significantly the impact of the garage on the block and area.

The Board recommends denial of the application on these grounds as well as general environmental principles. We cannot accept parking beyond the accessory number allowed as of right in Section 13-562 of the Zoning Resolution.

Sincerely,

Walter Mankoff

Chair

Manhattan Community Board No. 4

Lee Compton

Co-Chair

Chelsea Preservation & Planning Committee

Edward S. Kirkland

Co-Chair

Chelsea Preservation & Planning Committee

cc: Hon. Michael Bloomberg, Mayor

Hon. C. Virginia Fields, Manhattan Borough President

Local elected officials

Applicant c/o Deirdre A. Carson, Green Traurig, LLP

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