



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

330 West 42nd Street, 26th floor New York, NY 10036
tel: 212-736-4536 fax: 212-947-9512
www.ManhattanCB4.org

JEAN-DANIEL NOLAND
Chair

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

January 8, 2009

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

RE: ULURP Application No. 90191ZRY – Bicycle Parking Text Amendment

Dear Chair Burden:

On the recommendation of its Chelsea Preservation and Planning Committee, Manhattan Community Board No. 4 voted at its January 7, 2009 meeting to recommend approval of ULURP application number 90191ZRY with the comments listed below.

The proposed text amendment would require secure and enclosed bicycle parking in most new commercial, residential, and community facility buildings, in enlargements of existing buildings of over 50% and in buildings converted to residential use. The proposed amendment exempts one- and two-family residences; public service, wholesale and semi-industrial buildings; and all buildings used as houses of worship or in manufacturing. It also provides for waivers for certain minimum spaces or building square footage, permits the authorization of reduction of the number of required spaces or a waiver of the requirement under certain conditions and provides that required spaces may be provided on a different zoning lot on appropriate certification.

CB4 supports the general objective of encouraging alternatives to automobiles, including the specific objective of promoting bicycle ridership. The board believes that other than efforts to make bicycle riding safer through such means as the creation of dedicated bicycle lanes, the most important actions the city can take towards this goal are those that make every-day bicycle use, including commuting, more attractive. Because it would help create secure storage for bicycles at either end of a trip, CB4 believes the proposed amendment is a welcome step and offers the following comments and suggestions for your consideration.

- The term “Bicycle Parking” should be broadened to include parking for tri-cycles and other human-powered vehicles used by the elderly and others who are unable to ride bicycles.

- The number of spaces required per square foot of floor area should be aggressive and based on the anticipated level of use when bicycle parking is available at most locations. Considering that there typically are three types of building users – building staff, residents or workers for the enterprise(s) located in the building, and visitors or patrons – the requirements seem low and not calculated to encourage the full potential use of bicycles. We encourage you to review the requirements and to increase the number of spaces where feasible. We also encourage an analysis of necessary changes if the definition of bicycle is expanded as we suggest.
- Appropriate requirements should be developed and applied to those buildings currently exempt, including public service facilities, houses of worship, wholesale, semi-industrial and manufacturing uses. People who work in or visit these buildings should be able to expect to travel by bicycle, just as they should for other buildings.
- It is likely that building owners and developers will find it attractive to pool their requirements in centralized facilities, much as automobile parking is now, and they should be encouraged to do so. The certification for such off-site bicycle parking spaces should be available for all required building uses, and the Department of City Planning and the Department of Buildings should ensure that the certification process encourages its use.
- In order to encourage their use, bicycle parking should be made available either free or at nominal cost. Since the benefits of replacing automobiles accrue to everyone it would be appropriate to develop a mechanism that permitted the city to offset partially a building owner's costs.
- Although there should be provisions for waivers from the parking requirement with the demonstration of significant hardship, such waivers should be rare for buildings larger than 10,000 sq. ft. The cumulative impact of the proposed waivers for three to five spaces would be to decrease significantly the amount of parking created and thus impede the adoption of bicycle parking.
- Similarly, despite concerns expressed over the additional cost, affordable housing should not be exempt from the bicycle parking requirement.
- Authorization for reduction or waiver of bicycle parking when subsurface or infrastructure conditions make it “difficult or infeasible” should be limited to enlargements or conversions and should not be applicable to new developments where there is greater flexibility during the design phase.
- Use should be factored into determining the requirement, especially in buildings with multiple uses. A building with a significant assembly component, e.g., a court house, a movie theater or an assembly hall, has a denser use than a comparably sized office building and should have a correspondingly higher parking requirement. More generally, the bicycle parking requirement for a building should be the greater of the requirement for the building or the sum of the requirements for the individual uses.

- In order to attract bicycle riders, the required parking must be readily accessible, and individual bicycles within the parking area also must be readily accessible. Since building owners and developers will have a strong incentive to minimize the floor area provided for each bicycle, the permitted reduction in required floor area per bicycle must be based on a stringent test of accessibility and must not result in overcrowding that makes depositing or retrieving a bicycle so difficult as to discourage bicycle riding.

CB4 supports the proposed text amendment because it would encourage bicycle riding as an alternative means of transportation, and hopes you will consider our comments and suggestions to make it even more effective.

Sincerely,



Jean-Daniel Noland, Chair
Manhattan Community Board 4



J. Lee Compton, Chair
Chelsea Preservation and Planning

CC: DCP Calendar Office
DCP - Edith Hsu-Chen, Erika Sellke
NYC Speaker Christine Quinn
Manhattan Borough President