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Project #: 25722.00

From: Allison Ruddock, VHB  
Max Stember-Young, VHB

Re: 110 East 16th Street, Manhattan  
Residential Parking Growth Study

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As part of a proposed development at 110 East 16th Street (Manhattan Block 871, Lot 74) (the "Site") in Manhattan Community District ("CD") 5, the applicant requests a City Planning Commission ("CPC") special permit pursuant to ZR Section 13-451 (Additional Parking Spaces for Residential Growth) (the "Proposed Special Permit") to permit a parking garage with a total of up to 23 accessory parking spaces within a 110,000-gross square foot ("GSF") mixed-use development ("the Project"). The requested Special Permit would increase the number of accessory parking spaces at the Site to 23, including up to 15 granted pursuant to the Proposed Special Permit (the "With-Project Condition").<sup>1</sup>

This memorandum summarizes the findings of the residential growth parking ratio analysis as stipulated in the New York City Department of City Planning's ("DCP's") Section 13-451 (Additional Parking Space for Residential Growth) Special Permit Application Guidelines, Version 3.0 (the "DCP Guidelines"). The analysis supports the determination that, overall, the number of additional parking spaces requested in the proposed parking facility is reasonable and not excessive in relation to recent trends in the surrounding area.

### **Project Description and Context**

The Site is in the Union Square neighborhood at a midblock location on the south side of East 16th Street, approximately 160 feet west of Irving Place and 200 feet east of Union Square East. The Site is in an area predominately comprised of commercial, residential, community facility, open space, and mixed-use developments. Approximately 200 feet to the west is Union Square, where connections are available to eight subway lines and several connecting bus services.

The Site is currently improved with a public parking garage with a capacity of 196 parking spaces. In the With-Project Condition, a 110,000 GSF mixed-use development comprised of up to 55 dwelling units, up to 4,700 GSF of ground floor commercial and/or community facility space (with

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<sup>1</sup> The With-Action Scenario includes 23 accessory parking spaces. The number of proposed dwelling units in the Project ranges from 40 to 55. Based on a 40-unit development, 8 spaces are permitted as-of-right and 15 additional spaces would be permitted by the Proposed Special Permit. Based on a 55-unit development, 11 spaces are permitted as-of-right and 12 additional spaces would be permitted by the Proposed Special Permit.

a minimum of 690 GSF of community facility space), and up to 23 accessory parking spaces would be developed on the Site.

Over the existing condition, the Project would increase the number of existing residential units by up to 55 units, would decrease the number of permitted public parking spaces by 196, and would provide up to 23 new on-site accessory parking spaces for future residents' use.

To facilitate the Project, the following discretionary CPC actions would be required:

- Special Permit pursuant to ZR 13-451 (Additional Parking Spaces for Residential Growth), which requires the CPC to make the following findings:
  - a) the number of off-street parking spaces in such proposed parking facility is reasonable and not excessive in relation to recent trends in close proximity to the proposed facility with regard to:
    - 1) the increase in the number of #dwelling units#; and
    - 2) the number of both public and #accessory# off-street parking spaces, taking into account both the construction, if any, of new off-street parking facilities and the reduction, if any, in the number of such spaces in existing parking facilities. In making this determination, the Commission may take into account off-street parking facilities for which building permits have been granted, or which have obtained City Planning Commission special permits pursuant to Section 13-45; or
  - b) the proposed ratio of parking spaces to #dwelling units# in the proposed #development# or #enlargement# does not exceed:
    - 1) 20 percent of the total number of #dwelling units#, where such units are located within Community District 1, 2, 3, 4, 5 or 6; or
    - 2) 35 percent of the total number of #dwelling units#, where such units are located within Community District 7 or 8; and
- Special Permit pursuant to ZR 74-711 to modify height, setback, and yard requirements in association with Landmark Preservation. This proposed action is not discussed as a part of this memorandum.

The Project would provide a quantity of parking spaces beyond that described in ZR 13-451(b), and therefore a residential parking growth analysis is provided below.

### **Residential Growth Parking Analysis**

#### *Introduction, Data Sources, and Methodology*

To understand the development trends in the area over the last 10 years with respect to residential and off-street parking, geographic information system ("GIS") data made available on the DCP website was used, specifically the following sources:

- "DCA GIS files (November 2016)" is a spatial database of facilities licensed by the Department of Consumer Affairs ("DCA") for public parking;

- “New York City Department of Buildings (“DOB”) GIS files (November 2016)” is a spatial database that tracks new residential Certificates of Occupancy (“CofOs”) for development sites.

The two databases above allow for an analysis of the change in residential units versus the change of DCA-licensed parking facilities in a GIS program.

Pursuant to the Special Permit Guidelines and in consultation with DCP staff, a residential growth parking ratio was developed based on the residential parking change and the residential unit change over a “lookback” period covering 2007 to 2021 (the proposed “analysis (build) year”) based on the data provided in the sources listed above. In instances where data provided by DCP did not provide data for the “lookback” period, the nearest reported “lookback” period available was used.

In addition to the two GIS datasets noted above, other information was collected through research of recent special permits (to identify any change sites that could have occurred between 2015 and 2017), and by conducting field visits to verify that all residential parking and residential unit change sites in the study area were accounted for. A list of pipeline development and conversion projects in the area was also supplied by Corcoran Sunshine Marketing Group. As a result, some modifications were made to the residential parking and unit change site information provided in the datasets made available by DCP, which are explained in greater detail in the relevant sections below.

A review of pending CPC Special Permits found one application for a proposed public parking facility at 21 East 12th Street (ULURP No.: I 180069 ZSM/CEQR No.: 17DCP132M); the application would facilitate the development of 52 DU and 187 parking spaces. To conduct a conservative analysis, it was assumed this pending application will be approved.

*Study Area*

In accordance with the DCP guidelines for the Proposed Special Permit, the area within 1,800 feet of the Site was designated as the “study area” (DCP Guidelines define the “study area” as the area encompassed within an approximately 1/3-mile radius from the Site). The data available from the above sources was “clipped” to the study area using a GIS program to identify recent residential development as well as changes in public parking capacity.

As shown in Figure 1, the study area extends as far as East 23rd Street to the north, Fifth Avenue to the west, Second Avenue to the east, and 9th Street/Wanamaker Place to the south. While the Site is located wholly within CD 5, portions of the study area include portions of CDs 2, 3, and 6. Table 1 below indicates the ratio of available parking spaces used by residents by CD, as determined in the DCP Manhattan Core Public Parking Study (December 2011).

**Table 1: Percentage of Parking Used by Manhattan Residents by Community District**

MN Community District	Percentage of Parking Used by Residents
2	67
3	67
5	24
6	44

Within the study area, a total of 45 residential unit change sites (a site that for which DOB has issued a Certificate of Occupancy for residential units in 2007 or later, or a site where an application has

been filed with DOB to develop residential units) and 9 residential parking change sites (sites where the parking capacity has changed since August 2006) were identified.

#### *Residential Parking Change*

Based on the data made available by DCP and other sources noted above, an analysis of the residential parking change sites indicates a net decrease of 943 public parking spaces since August 2006. A total of 8 sites had their respective parking capacities eliminated, totaling 973 spaces, while one site increased DCA-licensed capacity from none to 30 spaces, and the pending Special Permit application would increase the parking capacity at 21 East 12th Street from 0 to 187 spaces (a net decrease of 4 parking spaces at this site as 285 spaces existing during the “lookback” period). These two sites with increased DCA-licensed parking capacity were assumed to have all spaces dedicated solely for residential use.

Based on the DCP-identified ratio of residential parking spaces in each community district noted in Table 1, there has been a net decrease of 369 residential parking spaces within the study area during the “lookback” period.

Further, a review of the CofOs found that eight non-DCA accessory parking facilities containing 355 accessory parking spaces were developed or are expected to be completed within the study area during the study period in the without-project condition (including the pending Special Permit application). All newly developed parking spaces are assumed to be wholly non-DCA residential parking spaces.

Table 1 at Appendix A provides details of the change in DCA licensed parking facilities.

#### *Residential Unit Change*

Data from DOB GIS (November 2016) indicates that a total of 45 sites have been issued a new residential CofO since 2007 or are expected to be completed by the analysis year within the study area.<sup>2</sup> Projects noted by Corcoran Sunshine Marketing Group and other project found within the DOB Building Information Systems were included in the analysis.

Across the 45 identified residential change sites, DOB data indicates there has been a net increase of 1,365 new dwelling units complete since 2007 or expected to be complete by the analysis year within the study area.

Because the Site would be developed absent the proposed actions, the 46 DUs and 9 accessory parking spaces that would be developed in the Without-Project condition were also included in the residential unit change analysis, making a total of 46 residential change sites (representing an increase of 1,411 dwelling units) and 10 residential parking change sites within the study area.

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<sup>2</sup> The review found four additional records which were not reasonable to include for further analysis; specifically, these were excluded because they met one or both of the following criteria:

- Multiple new CofOs had been issued to a site that did not indicate an increase in the number of the site’s dwelling units within the analysis period (i.e. a CofO was reissued); or
- A Temporary Certificates of Occupancy for residential units was issued for a site before 2007, and a final CofO permitting the same number of residential units was issued in 2007 or later (i.e. units were already occupied prior to 2007 and therefore there has been no increase in residential units for that site since 2007).

## Residential Parking Growth Ratio

To understand the development trends related to off-street parking in the study area in the Without-Project condition, a residential parking growth ratio was determined for the study period using the sum of the change in DCA Residential Parking Spaces and the Change in number of Non-DCA Accessory Parking Spaces, divided by the change of residential units. A residential parking growth was also calculated in the With-Project condition; this With-Project growth was calculated by adding the change in the number of DCA residential parking spaces, the change in the number of Non-DCA parking spaces, and the proposed number of parking spaces, divided by the sum of the change in residential units absent the Project and the Project’s proposed number of residential units. Table 2 below summarizes the Residential Parking Change and Residential Unit Change analysis and Without-/ With-Project residential parking growth ratios.

**Table 2: Parking Growth Ratio – Without and With Project**

<b>Without Project Growth Ratio: (A+B)/C</b>	
A – Change in number of DCA Residential Parking Spaces	-369
B – Change in number of Non-DCA Accessory Parking Spaces	+355
(A+B) Net change in number of residential parking spaces	-14
C – Change in Residential Units	+1,411
<b>Background Residential Parking Growth Ratio (Without Project Growth Ratio)</b>	<b>-0.010</b>
<b>Residential Parking Growth Ratio – With Project: (A+B+P1)/(C+P2)</b>	
P1 – Proposed Number of Parking Spaces	-24
P2 – Proposed Number of Residential Units	+55
<b>Residential Parking Growth Ratio – With Project</b>	<b>-0.026</b>

As the analysis described above indicates a net decrease of 14 residential parking spaces and a net increase of 1,411 dwelling units within the study area, the change in residential parking spaces divided by the change in residential units over the course of the 2007-2021 lookback period indicates that absent the proposed project, there has been a residential parking growth ratio of -.010 (-1%); in the With Project condition, this ratio would be -0.026 (-2.6%).

In accordance with DCP Guidelines, this residential parking growth ratio should be generally aligned with the maximum allowable as-of-right parking space-to-residential unit ratio in the Manhattan Core outlined in Table 1 above. As demonstrated by the analysis, there has been negative growth in residential parking spaces, which is well below the residential parking spaces per residential unit permitted as-of-right within CDs 2, 3, 5, and 6 (0.20 spaces per residential unit), and the negative residential parking growth rate would continue in the With-Project condition.

As such, the Project (which would provide up to 23 accessory residential parking spaces) would provide additional residential parking supply within an area that has experienced negative residential parking supply growth over the “lookback” period, and therefore could be considered reasonable and not excessive in relation to recent trends within the study area.

### Associated Sites for Residential Growth Special Permit Spaces

According to the DCP Guidelines, nearby residential growth sites and/or residential parking sites need to be “associated” with each parking space in the project. Assuming the Project will include 40 to 55 DUs and 23 accessory residential parking spaces, 8 to 11 spaces would be permitted as-of-right and 12 to 15 spaces would be permitted by special permit. Consistent with the parking waiver sought, 12 to 15 requested additional spaces must be associated to a former DCA-licensed facility. Because the Project would be located on a site that would remove 196 parking spaces (of which 47 are assumed to be residential parking spaces<sup>3</sup>), the applicant proposes to self-associate all requested additional accessory residential parking spaces to the Site.

**Table 3: Proposed Project Summary and Associations**

Proposed Project					
Site Location	Parking Spaces	Residential Units	Permitted AOR Parking Spaces	Parking Spaces Request via Special Permit	
110 East 16th St	23	40 to 55	8 to 11	12 to 15	
Associations					
			Type C: Self Association		
Site Location	Distance to Project (ft)	Spaces to Associate	DCA Capacity	DCA Residential Parking Capacity	Expected Loss in Residential Capacity
110 East 16th St	0	12 to 15	196	47	24

### Pending Special Permits

As described above, a review of pending CPC Special Permits within the study area yielded that there is one pending special permit pursuant ZR 13-451. This pending special permit, if approved and constructed, would facilitate the development of 52 DUs and 187 spaces at 21 East 12th Street (Bl: 570, Lot 7503).

### Conclusion

The proposed project seeks a CPC Special Permit pursuant to ZR 13-451 to facilitate the development of 23 accessory residential parking spaces, which up to 14 would be permitted by the Proposed Special Permit. An analysis of recent development trends in the area indicates a negative growth in the supply of residential parking, and an overall negative residential parking growth ratio of -0.010. In the With-Project condition, the residential parking growth rate would be -0.026, which is still well below the as-of-right 0.20 ratio permitted within the Manhattan Core. As such, the proposed quantity of 23 accessory residential parking spaces is reasonable and not considered excessive in relation to recent development trends within the study area.

<sup>3</sup> Based on ratio of 0.24 residential parking spaces in public parking facilities identified in the Manhattan Core Parking Study.



- Project Zoning Lot
- Development Site
- Parking Study Area
- Residential Change Site
- DCA Lookback Facilities
- Community Districts

110 East 16th Street  
Manhattan, New York

Residential Parking  
Growth Study

Figure  
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## Appendix A: Residential Parking Tables



**Table 1: Residential Parking Change Sites**

Map ID	BBL	CD	Street Number	Street Name	Distance from Project Site	DCA	% of	Total # of	DCA Total	% of	Total #	Net Change in DCA Residential Spaces	Cross Reference Table 2 Map ID	Association (# of spaces)	Notes
						Parking Spaces Lookback	Residential Spaces Lookback	Residential Spaces Lookback	Parking Spaces Current	Residential Spaces Current	Residential Spaces Current				
P1	1008710074	105	112	East 16th St	0.0	196	24%	47.0	0	0%	0	(47)	R1		Proposed Development Site
P2	1008737501	105	57	Irving Pl	420.0	119	24%	28.6	0	0%	0	(29)	R3		
P3	1005640045	102	132	4th Av	682.6	30	67%	20.1	0	0%	0	(20)			
P4	1005567502	103	74	3rd Ave	1,116.7	80	67%	53.6	0	0%	0	(54)			
P5	1005707502	102	12-16	East 13th St	1,216.2	250	67%	167.5	0	0%	0	(168)	R21		
P6	1005700036	102	17	East 12th St	1,239.4	285	67%	191.0	187	100%	187	(4)	R23		CPC application certified 30 Oct
P7	1005627503	102	64	East 11th St	1,263.5	147	67%	98.5	0	0%	0	(98)			
P8	1009000025	106	237-241	East 19th St	1,476.5	14	44%	6.2	0	0%	0	(6)			
P9	1009010006	106	235	East 20th St	1,494.5	48	44%	21.1	0	0%	0	(21)			
P10	1009210051	106	318	East 15th St	1,653.2	0	44%	0.0	30	100%	30	30			

**Table 2: Residential Unit Change**

Map ID	BBL	CD	Street Number	Street Name	Distance from Project Site	Residential Units Lookback	Residential Units Current & Future	Residential Units Net Change	Parking Spaces Permitted AOR	Parking Spaces Total Built	Parking Spaces Unbuilt	Cross Reference Table 1 Map ID	DCA License Number	Building Status & Year	Association (# of spaces)	Notes
R1	1008710074	105	110	EAST 16TH ST	0.0	0	44	44	9	9	0	P1		2021		Proposed Project
R2	1008710030	106	135	EAST 15TH ST	389.5	0	1	1	0	0	0			2012		Modified by TOC review
R3	1008737501	105	57	IRVING PL	420.0	0	9	9	2	1	1	P2		2012		
R4	1008740073	105	106	EAST 19TH ST	682.7	9	10	1	2	0	2			2013		Bldg alteration
R5	1005597501	103	110	3 AVE	764.5	0	77	77	15	0	15			2007		
R6	1008747505	106	78	IRVING PL	770.8	14	7	-7	0	0	0			2015		Alteration to convert existing 14-unit building to a 7-unit building
R7	1008460054	105	870	BROADWAY	778.1	0	3	3	1	0	1			2015		
R8	1005717505	102	128	UNIVERSITY PL	831.2	0	20	20	4	0	4			2007		
R9	1008460021	105	861	BROADWAY	844.8	0	3	3	0	0	0			2009		Bldg alteration
R10	1008460022	105	863	BROADWAY	863.6	0	2	2	0	0	0			2009		
R11	1004697505	103	123	3 AVE	892.9	0	48	48	10	0	10			2010		Current up from 46 DU (+2)
R12	1008487505	105	240	PARK AVE SOUTH	894.8	0	51	51	10	0	10			2008		Conversion from commercial use; current down from 53 DU (-2)
R13	1008757503	106	18	GRAMERCY PARK S	916.4	0	16	16	3	0	3			2013		
R14	1005640030	102	37	EAST 12TH ST	933.5	0	6	6	1	0	1			2016		Current down from 8 DU (-2)
R15	1004680007	103	99	THIRD AVE	1,009.1	27	32	5	6	0	6			2009		Previously 27 SROs
R16	1004697506	103	211	EAST 13TH ST	1,039.5	0	83	83	17	0	17			2014		Current up from 82 DU (+1)
R17	1005707503	102	21	EAST 12TH ST	1,085.2	0	52	52	13	187	0	P6		2018		AKA 110 University Pl or 116 University Pl
R18	1005627503	102	66	EAST 11TH ST	1,114.9	0	6	6	1	1	0			2014		
R19	1004690049	103	229	EAST 13 ST	1,127.4	0	28	28	6	0	6			2009		
R20	1005637503	102	809	BROADWAY	1,150.7	0	3	3	1	0	1			2019		
R21	1005707502	102	12	EAST 13 ST	1,216.2	0	9	9	2	11	-9	P5		2015		Current up from 8 DU (+1), converted from prior parking use
R22	1009000057	106	241	THIRD AVE	1,217.5	0	20	20	4	0	4			2019		AKA 239-243 3 AVE. Pipeline project identified by Corcoran Sunshine
R23	1005707504	102	17	EAST 12TH ST	1,239.4	0	9	9	2	9	-7			2014		As-of-right conversion from prior parking use
R24	1005710001	102	65	FIFTH AVE	1,241.0	0	141	141	28	0	28			2013		Current down from 145 DU (-4)
R25	1008460004	105	103	5TH AVE	1,254.5	3	6	3	1	0	1			2014		3 DU existed in 2006
R26	1005620029	102	791	BROADWAY	1,304.3	3	8	5	2	0	2			2011		
R27	1009000009	106	215	EAST 19TH ST	1,312.1	0	140	140	28	96	-68			2017		As-of-right conversion from medical use
R28	1005697505	102	82	UNIVERSITY PL	1,331.2	0	7	7	1	0	1			2010		
R29	1005700007	102	61	5 AVE	1,336.2	0	4	4	1	0	1			2014		
R30	1004690033	103	221	2 AVE	1,351.0	0	3	3	1	0	1			2011		
R31	1009010058	106	257	THIRD AVE	1,437.4	0	65	65	13	0	13			2018		AKA 253-261 3 AVE
R32	1008770044	106	266	3 AVE	1,476.7	0	7	7	1	0	1			Const.		
R33	1009000030	106	228	EAST 20 ST	1,490.3	1	37	36	7	0	7			Const.		Building E demo'ed in 2014
R34	1008180039	105	3	WEST 16 ST	1,501.9	0	5	5	1	0	1			2015		
R35	1004667501	103	101	EAST 10 ST	1,515.4	0	34	34	7	0	7			2007		
R36	1008480073	105	133	FIFTH AVE	1,519.2	0	4	4	1	0	1			2011		
R37	1008777501	106	160	EAST 22ND ST	1,565.5	0	82	82	16	0	16			2014		
R38	1005550018	103	80	EAST 10 ST	1,586.8	0	12	12	2	0	2			2019		AKA 71 4 AVE
R39	1005777504	102	14	WEST 14 ST	1,621.9	0	30	30	6	0	6			2010		
R40	1008510032	105	45	EAST 22ND ST	1,636.2	8	83	75	17	16	1			Const.		Current up from 81 DU (+2)
R41	1008207503	105	8	WEST 19 ST	1,657.4	7	10	3	2	0	2			2015		Altered bldg; TCO issued 2006 permitted 7 DU, 10 DU per 2015 TCO
R42	1008190027	105	17	WEST 17 ST	1,665.0	0	1	1	0	0	0			2009		
R43	1008787501	106	121	EAST 22ND ST	1,682.1	0	134	134	27	25	2			2017		
R44	1008207504	105	16	WEST 19 ST	1,750.3	0	56	56	11	0	11			2007		Current down from 63 DU (-7)
R45	1008780045	106	160	EAST 23 ST	1,773.1	0	18	18	4	0	4			2013		
R46	1008177503	105	35	W 15TH ST	1,782.4	0	55	55	11	0	11			2015		Current up from 44 DU (+11)

**Table 3: Associations**

Applicant Project Name	BBL	CD	Street Number	Street Name	Study Period	ULURP #	CPC Review Session	Residential Units Proposed	Parking Spaces Proposed	Permitted AOR Parking Spaces	Number of Parking Spaces to Associate	Number of Sites Associated
110 E 16th Street	1008710074	105	110	E 16th St	2007-2021	TBC	TBC	40 to 55	23	8 to 12	12 to 15	1
Association Site								Type C Association Only: Applicant Self-Association Lost Residential Parking Spaces				
ST Number	ST Name	CD	BBL	Pluto X	Pluto Y	Distance from Project Site	Number of Spaces Associating	10 Year Association End Date	Map ID Number	DCA Capacity	DCA Residential Parking Capacity	Expected Loss in Residential Capacity
110	E 16th ST	105	1008710074	987390	207206	0.0 ft	12	2027	R1/P1	196	47	24

**110 East 16th Street - Residential Parking Growth Study**