



To: Stephen Johnson and Richard Suarez –
New York City Department of City Planning

Date: March 9, 2016

Memorandum

CC: Colin Leary – Ironstate Development
Deirdre Carson and Daniel Egers –
Greenberg Traurig
Nancy Doon and Marty Taub – VHB

Project #: 29112.00

From: Noah Bernstein and Amir Rizavi – VHB

Re: West 29th Street Parking Garage -
Special Parking Permit Study

As part of a proposed redevelopment of 217-221 West 29th Street (Manhattan Block 779, Lots 27 and 28) (the “Site”), the applicant is requesting a special permit pursuant to ZR Section 13-451 (Additional parking spaces for residential growth) to permit a parking garage with a total of 45 spaces (the “Garage”) within a 95-unit residential development proposed (“the Project”).

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) *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 Project is located on the north side of West 29th Street, approximately 200 feet west of Seventh Avenue. The Site is currently occupied by a 48-space public parking lot¹. The proposed project would redevelop the Site as a 21-story, 95-unit residential development with a small ground floor retail store and a 45-space below-grade accessory parking garage. Therefore, the Project would increase the number of residential units on-site and in the vicinity, but would not create a net increase in parking as compared to existing conditions, and would actually create a slight net decrease (3 spaces).

The recent development trends in the study area (DCP Guidelines define the “study area” as the area encompassed within a 1/3-mile radius from the Site) have been residential and mixed-use developments and conversions from former warehouse and manufacturing buildings. As described in detail later, New York City Department of Buildings (DOB) data provided by the DCP, show that there have been approximately 20 residential developments and conversions (completed or under construction) within the study area since 2005, eight of which were large developments of 200 or more dwelling units. In 2011, to facilitate residential development in the immediate area, the City Planning Commission and City Council approved a two-block rezoning of West 28 and West 29 Streets between Seventh and Eighth Avenues to allow residential uses as-of-right up to an FAR of 9.0, and up to 12.0 through the provision of inclusionary housing.

¹ The parking facility has two DCA licenses (License No. 1025798 [36 spaces] and License No. 1025799 [12 spaces]) for a total licensed capacity of 48 spaces.

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The Site is also approximately two-and-a-half blocks south of Madison Square Garden, a major event venue, which generates a large parking demand, especially on nights and weekends.

Some of the residential and mixed-use developments that have recently occurred in the area have been on sites with active New York City Department of Consumer Affairs (DCA)-licensed public parking facilities. In several cases, the public parking has been replaced on-site as part of the redevelopment.

Residential Parking Analysis

In order to demonstrate that the number of proposed additional parking spaces requested is reasonable and not excessive in relation to recent trends in the area, a residential parking analysis was performed. Following 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 2005 to 2017 (the proposed Build year).

This analysis, was performed with data from the New York City Department of Consumer Affairs (DCA) and the Department of Buildings (DOB) provided by DCP showing the change in DCA-licensed public parking spaces and the change in residential units, respectively. These data sets included all changes occurring within Manhattan Community Districts (CD) 4 and 5, covering a 10-year lookback period of 2005-2015². In addition to these data, other information was collected by researching recent special permits (to identify any change sites occurring between 2015 and 2017), and by conducting field visits to verify that all residential parking and residential unit change sites³ in the study area were accounted for. As a result, some additions and modifications were made to the residential parking and unit change site information provided by DCP. These changes are explained in greater detail in the Residential Parking Change and Residential Unit Change sections below.

As stipulated in the DCP Guidelines, a “study area” of 1/3-mile from the Site was used. As shown in **Figure 1**, the study area generally extends to West 36th Street to the north, Broadway to the east, West 23rd Street to the south and Ninth Avenue to the west. Most of the study area is within CD 5 while a portion of it (mostly west of Eighth Avenue and south of West 26th Street) is within CD 4. Overall, there are 20 residential parking change sites and 20 residential unit change sites within the study area. All of the change sites in the study area are located south of West 33rd Street.

² DCA and DOB data were downloaded from DCP’s website (http://www.nyc.gov/html/dcp/html/ap/step3_mn_core.shtml) on 05/15/2015.

³ A “Residential Parking Change Site” is defined in the DCP guidelines as “indicating the net change in the number of parking spaces in DCA-licensed parking facilities and accessory parking spaces in residential buildings without a DCA-license within the study area”; and a “Residential Unit Change Site” is defined as “indicating the net change in residential units at all locations within the study area” and includes “sites that are expected to change in the near future up to the build year of the proposed development”.



West 29th Street Parking Garage
New York, New York

Special Parking Permit Analysis

Figure 1

- Zoning Lot
- Project Site
- 1/3-Mile Radius
- Community District Boundary
- Parking Change Site
- Residential Change Site
- CD 4** Community District ID

Sources: 1. New York (City). Dept. of City Planning 2013. Manhattan MapPLUTO (Edition 13v2). New York City: NYC Department of City Planning.
2. New York (City). Dept. of City Planning 2013. LION (Edition 13C). New York City: NYC Department of City Planning.

Residential Parking Change

The DCA data provided by DCP, suggested that there were 25 parking change sites within the study area; however, further study enabled us to determine that five of these sites were not change sites and had the same licensed capacity as existed prior to the 2005-2015 lookback period. This determination was made by researching Certificates of Occupancy and/or performing field and historical aerial photograph verifications. A further description of these removed change sites along with backup is provided in the Appendix (see Table A-1).

Although some DCA change sites were removed, three new change sites (not included in the DCA data) were added. As indicated in **Table 1** (sites P1, P4 and P5), these include the 48-space public lot currently on the Site (DCA License Nos. 1025798 and 1025799), and the two facilities on the site of the approved but currently unbuilt development project at 241-245 West 28th Street (Manhattan Block 778; Lots 13, 16, 18, and 66). One of these facilities was a 240-space parking garage (DCA License No. 1233094, Lot 18) which was demolished in 2012, and the other was an active public parking lot (Edison ParkFast, DCA License No. 0926756). The Edison ParkFast lot, which was recently closed, had a licensed capacity of 131 spaces. Based on a conversation with the Edison ParkFast facility manager while it was still in operation (in May 2014), it was determined that approximately 50 percent of these spaces are for residential use (including monthly parking permits). Changes are being proposed to the original special permit for this site; however, since the revised permit application is still pending, the project is not included as a residential unit change site, only as a residential parking change site.

For the purpose of the residential parking change calculation, the default residential usage rates provided by the DCP Guidelines for DCA-licensed public parking facility change sites (derived from DCP's Manhattan Core Public Parking Study [2011]) were assumed. These rates assign 24 percent of the spaces in facilities located in CD 5 and 30 percent of spaces in CD 4 to residential use. The only exception was for the Edison ParkFast lot since, as mentioned earlier, a field verification of this lot indicated that approximately 50 percent of spaces at this facility are purely for residential use. Therefore, the residential parking percentage was modified accordingly for this facility.

As shown in **Table 1**, as a result of changes to DCA-licensed parking facilities within the study area during the 2005-2017 lookback period, an overall net decrease of 512 residential parking spaces is estimated for the area. Some of the lost parking has been replaced with new accessory and public parking facilities associated with new residential and mixed-use developments, detailed in the following section.

Residential Unit Change

In addition to changes to public parking, there have been many new residential developments in the study area during the lookback period (see **Table 2**). According to DOB data provided by DCP, there are 19 new residential and residential/commercial mixed-use developments in the study area. One additional location was identified and added to the inventory (site R20). This site is a small, 39-unit residential loft conversion. No residential units were lost during the lookback period. As shown in **Table 2**, a total of 2,790 new residential units were added (or will be added) to the study area during the lookback period.

Table 1
RESIDENTIAL PARKING CHANGE (2005-2017 LOOKBACK PERIOD)

Map ID	BBL	CD	Street Number	Street Name	Approximate Distance from Project Site (ft)	DCA Parking Spaces Lookback	% of Residential Spaces Lookback	Total # of Residential Spaces Lookback	DCA Total Parking Spaces Current	% of Residential Spaces Current	Total # Residential Spaces Current	Net Change in DCA Resi Spaces	Cross Reference - Table 2 Map ID	Notes
P1	1007290027, 1007290028	105	217-219, 221	WEST 29TH STREET	0	48	24%	12	0	24%	0	-12		Recently closed DCA lot on project site (Lic. Nos. 10257298 (35 spaces) and 10257299 (12 spaces))
P2	1007780057	105	234	WEST 29TH STREET	260	70	24%	17	0	24%	0	-17		
P3	1007780030	105	217	WEST 28TH STREET	275	25	24%	6	26	24%	6	0		
P4	1007780018, 1007780020	105	241	WEST 28TH STREET	320	240	24%	58	0	24%	0	-58		Former DCA garage (Lic. No 1233004), demolished in 2012 in anticipation of Edison ParkFast site redevelopment
P5	1007780016	105	245	WEST 28TH STREET	360	131	50%	66	0	24%	0	-66		Recently closed DCA lot (Lic. No. 0926756) on a approved redevelopment site. Per discussion with facility manager (May 2014), approximately 50% of total spaces were residential.
P6	1008040053	105	122	WEST 29TH STREET	850	44	24%	11	0	24%	0	-11		
P7	100807501	105	125	WEST 31 STREET	985	0	24%	0	0	24%	0	0	R5	*See Residential Unit Change Table
P8	1008057502	105	839	AVENUE OF THE AMERICAS	1,035	387	24%	93	0	24%	0	-93	R6	*See Residential Unit Change Table
P9	1007757502	104	252	WEST 26TH STREET	1,040	82	30%	25	0	30%	0	-25	R7	*See Residential Unit Change Table
P10	1007757502	104	312	8 AVENUE	1,040	90	30%	27	0	30%	0	-27		
P11	1008060034	105	106-108	WEST 31 STREET	1,085	20	24%	5	0	24%	0	-5	R8	*See Residential Unit Change Table
P12	1008020026	105	121-125	WEST 26TH STREET	1,200	63	24%	15	0	24%	0	-15		
P13	100807502	105	885	6 AVENUE	1,205	0	24%	0	0	24%	0	0	R11	*See Residential Unit Change Table
P14	100807502	105	109	WEST 31ST STREET	1,205	35	24%	8	0	24%	0	-8		
P15	1008007505	104	159	WEST 24TH STREET	1,360	125	30%	38	0	30%	0	-38	R13	*See Residential Unit Change Table
P16	1008270001	105	46	WEST 26TH STREET	1,620	30	24%	7	0	24%	0	-7		
P17	1008270001	105	55	WEST 25TH STREET	1,620	0	24%	0	0	24%	0	0	R17	*See Residential Unit Change Table
P18	1008270001	105	756	6 AVENUE	1,620	175	24%	42	0	24%	0	-42		
P19	1008007504	104	735	6 AVENUE	1,635	175	30%	53	0	30%	0	-53	R18	*See Residential Unit Change Table
P20	1007290060	104	401	9 AVENUE	1,780	115	30%	35	0	30%	0	-35		Former DCA lot (Lic. 0428456). Site cleared for future Manhattan West development (expected 2019)
Totals						1,855		518	26		6	-512		

NOTES

Map ID is the identification number of the site that has a change in the number of parking spaces

BBL is the Borough Block Lot number of the site with no hyphens or dashes

CD is the Community District of the site

Distance from Project Site is measured in feet and sorted from closest to furthest from applicant's site

DCA Parking Spaces Lookback is the number of DCA parking spaces at the site during the study period

% of Residential Parking Spaces in Lookback is the percentage of parking spaces at the site used by residents (use percentages given in the application guidelines or determine through own methods)

Total # of Residential Spaces in Lookback is the number of residential parking spaces at the site (previous two columns multiplied)

DCA Total Parking Spaces Current is the number of parking spaces currently at the site

% of Residential Parking Spaces Current is the percentage of parking spaces at the site used by residents

Total # Residential Parking Spaces Current is the number of residential parking spaces at the site (previous two columns multiplied)

Net Change in DCA Residential Parking Spaces is the number of residential spaces in the lookback period subtracted by the number of current residential spaces

Cross Reference Table 2 Map ID is the Map ID of the site if it is located in Table 2

All edits, corrections, additions to the DCA and DOB data forwarded by DCP are shown in *italics*.

Table 2

RESIDENTIAL UNIT CHANGE (2005-2017 LOOKBACK PERIOD)

Map ID	BBL	CD	Street Number	Street Name	Distance from Project Site (ft)	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	Notes
R1	1007790007	105	257	WEST 29TH STREET	470	3	37	34	7	0	-7			under construction	
R2	1007787501	105	261	WEST 28TH STREET	580	0	53	53	11	0	-11			complete 2007	
R3	1008067501	105	143	WEST 30TH STREET	625	0	26	26	5	0	-5			complete 2011	
R4	1007767502	105	237	WEST 26TH STREET	815	0	4	4	1	0	-1			complete 2008	
R5	1008077501	105	125	WEST 31ST STREET	985	0	554	554	111	120	9	P7	1266254	complete 2007	Former DCA Public Parking Facility; New DCA public parking facility (special permit pursuant to ZR sections 13-562 and 74-52)
R6	1008057502	105	839	6 AVENUE	1,035	0	302	302	60	356	296	P8	14022491	complete 2010	former DCA public parking facility; New DCA public parking facility (special permit pursuant to ZR sections 13-562 and 74-52, C070073 ZSM); Mixed-use hotel and residential - Since development is half residential and half hotel and public use, assumed 365 spaces (1 space per residential unit plus 24% of the remaining spaces) of the 529 spaces are residential (confirmed with facility operator in May 2014).
R7	1007757502	104	260	WEST 26TH STREET	1,040	0	204	204	41	0	-41	P9, P10		complete 2013	
R8	1008060034	105	855	6 AVENUE	1,085	0	382	382	76	0	-76	P11		under construction	Former DCA public parking facility
R9	1007750005	104	261	WEST 25TH STREET	1,130	0	49	49	10	0	-10			complete 2015	
R10	1008010660	104	132	WEST 26TH STREET	1,190	2	10	8	2	0	-2			under construction	Information obtained from Temporary C of O.
R11	1008077502	105	885	6 AVENUE	1,205	0	337	337	67	201	134	P13, P14	14022406	complete 2011	Former DCA public parking facility; New DCA Facility; Special Permit C 08052425M applies to this site
R12	1007740004	104	286	8 AVENUE	1,350	0	5	5	1	0	-1			complete 2005	Former DCA public parking facility; 8 parking spaces per C of O
R13	1008007505	104	159	WEST 24TH STREET	1,355	0	24	24	5	8	3	P15		complete 2012	
R14	1008330075	105	1265	BROADWAY	1,415	0	70	70	14	0	-14			complete 2008	
R15	1007737501	104	200	WEST 24TH STREET	1,430	0	20	20	4	0	-4			complete 2012	
R16	1008270001	105	55	WEST 25TH STREET	1,620	0	407	407	81	85	4	P16, P17, P18	1263167	complete 2007	Former DCA public parking facility; New DCA Facility
R17	1007997501	104	124	WEST 24TH STREET	1,635	0	20	20	4	0	-4			complete 2010	
R18	1008007504	104	735	6 AVENUE	1,645	0	202	202	40	0	-40	P19		complete 2008	Former DCA public parking facility; 202 residential units according to C of O
R19	1008300026	105	1182	BROADWAY	1,780	0	39	39	8	0	-8			complete 2013	Loft conversion; West 28th Street Rezoning EAS No Build site. Information obtained from Temporary C of O.
R20	1007237501	104	263	9 AVENUE	1,865	0	50	50	10	0	-10			complete 2006	
Totals						5	2,795	2,790	558	770	212				

NOTES

Map ID is the identification number of a site with new dwelling units

BBL is the Borough Block/Lot number of the site with no hyphens or dashes

CD is the Community District of the site

Distance from Project Site is measured in feet and sorted from closest to furthest from applicant's site

Residential Units Lookback is the number of units at the site previous to development or conversion

Residential Units Current and Future is the current number of units or the number of units once the project is complete

Residential Units Net Change is the net change of residential units at site in the study period

Parking Spaces Permitted As-of-Right is the number of parking spaces permitted under zoning at the site

Parking Spaces Total Built is the total number of parking spaces at the site including through discretionary actions (actions should be stated in the notes)

Parking Spaces Unbuilt is the Total Built; Parking Spaces minus the Permitted AOR Parking Spaces (can be a positive or negative number)

Cross Reference to Table 1 Map ID is the Map ID of the site (ft) is located in Table 1

All edits, corrections, additions to the DCA and DOB data forwarded by DCP are shown in *italics*

Five of the 20 new residential change sites also have new associated parking. Four of these parking facilities are DCA-licensed public parking facilities, and all of these facilities are on sites with former DCA-licensed public parking facilities. However, in accordance with the DCP Guidelines, for the purpose of this analysis, all new parking associated with a new residential development is considered 100 percent residential, even if the new parking facility is for public use. This methodology is especially conservative since, due to the Site's proximity to Madison Square Garden and surrounding commercial and office uses, the assignment of all spaces to residential use in a decidedly mixed-use neighborhood does not reflect actual parking usage patterns in the study area.

This methodology was applied to all the new parking facilities associated with the residential change sites, with the exception of site R7 (839 6th Avenue, BBL No. 1008057502), which includes a recent mixed-use residential, hotel and commercial development with approximately 300 residential units, 300 hotel rooms and a 529-space public parking garage (DCA License No. 1422491). Since half of the development is a hotel, it was felt that only half of the parking garage should be assigned as a residential parking facility. In consultation with DCP, this was field checked and, based on discussion with staff at this parking facility in May 2014, it was verified that only about 300 of the 529 spaces are residential. The remaining spaces are dedicated as valet spaces for the hotel on-site (Hotel Eventi) and two other nearby hotels (Doubletree and Holiday Inn) or for general public use, and a 24 percent residential parking share was applied for these spaces per DCP guidelines for public parking facilities. Therefore, only 356 (300 spaces from the residential parking component and 56 spaces [24 percent] from the public parking component) of the 529 total spaces at this parking facility were considered residential. The resulting total number of residential parking spaces built in the study area during the lookback period is 770.

Residential Parking Growth Ratio

Based on the change in residential parking spaces and the change in residential units over the course of the 2005-2017 lookback period, a residential parking growth ratio was calculated for the study area. According to the DCP Guidelines, this ratio should be in line with the maximum allowable as-of-right parking space-to-residential unit ratio in the Manhattan Core, which for CD 4 and CD 5 is 0.20 parking spaces per dwelling unit. As shown in **Table 3**, there would be a net increase of 258 residential parking spaces (net change in DCA residential parking spaces plus new parking spaces associated with new development [DCA or Non-DCA]) and an increase of 2,790 residential units in the study area. This translates to 0.09 residential parking spaces per unit. With the proposed project, there would be a net increase of 303 residential parking spaces and 2,885 new residential units, a rate of 0.11 residential parking spaces per dwelling unit over the lookback period.

Since there would be no appreciable difference in the overall residential parking growth ratio with the Project than without (0.11 as compared to 0.09, an increase of about two percent) over the lookback period, and since both of these ratios are well below the maximum allowable as-of-right residential parking ratio in this area of the Manhattan, it is reasonable and in line with recent development trends in the surrounding area to build an additional 26 parking spaces on the Site in addition to the 19 allowed as-of-right, especially since these additional spaces would be replacing in-kind existing spaces.

Table 3
RESIDENTIAL PARKING GROWTH RATIO CALCULATIONS (2005-2017 LOOKBACK PERIOD)

Background Parking Growth Ratio = (A+B)/C	
A - Change in Number of DCA Residential Parking Spaces (not including DCA spaces in new residential buildings)	-512 ¹
B - Change in Number of Non-DCA Accessory Parking spaces (includes DCA spaces in new residential buildings)	770 ²
C - Change in Residential Units	2,790 ³
Net Change in Residential Parking	258
12 Year Background Parking Growth Ratio	0.09
Residential Parking Growth Ratio With Project = (A+B+P1)/(C+P2)	
P1 - Proposed Number Parking Spaces (DCA or not)	45
P2 - Proposed Number of Residential Units (minus any residential units already on-site)	95
Net Change in Residential Units	2,885
Net Change in Residential Parking	303
12 Year Parking Growth Ratio With Project	0.11
Notes: 1. Total from 'Net Change in DCA Residential Spaces' column (Table 1) 2. Total from 'Parking Spaces Total Built' column (Table 2) 3. Total from 'Residential Units Net Change' column (Table 2)	

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. As shown in **Table 4**, of the 45 proposed parking spaces, 19 would be as-of-right and associated with the Project, 12 would be associated with lost residential public parking spaces in the existing public parking facility (that is, 24 percent of the existing spaces, per the DCP Guidelines), and the remaining 14 would be associated with the residential spaces lost from the former DCA parking facility at 234 West 29th Street (BBL No. 107780060) – the closest parking change site to the project site. Associated sites for the Project are shown in **Figure 2**. None of these spaces has previously been associated with another parking facility or residential development in prior special parking permit applications. Therefore, all spaces in the proposed 45-space public parking garage would be associated with lost spaces from eligible sites.

Table 4
PARKING ASSOCIATION FOR SPECIAL PERMIT RESIDENTIAL PARKING⁴

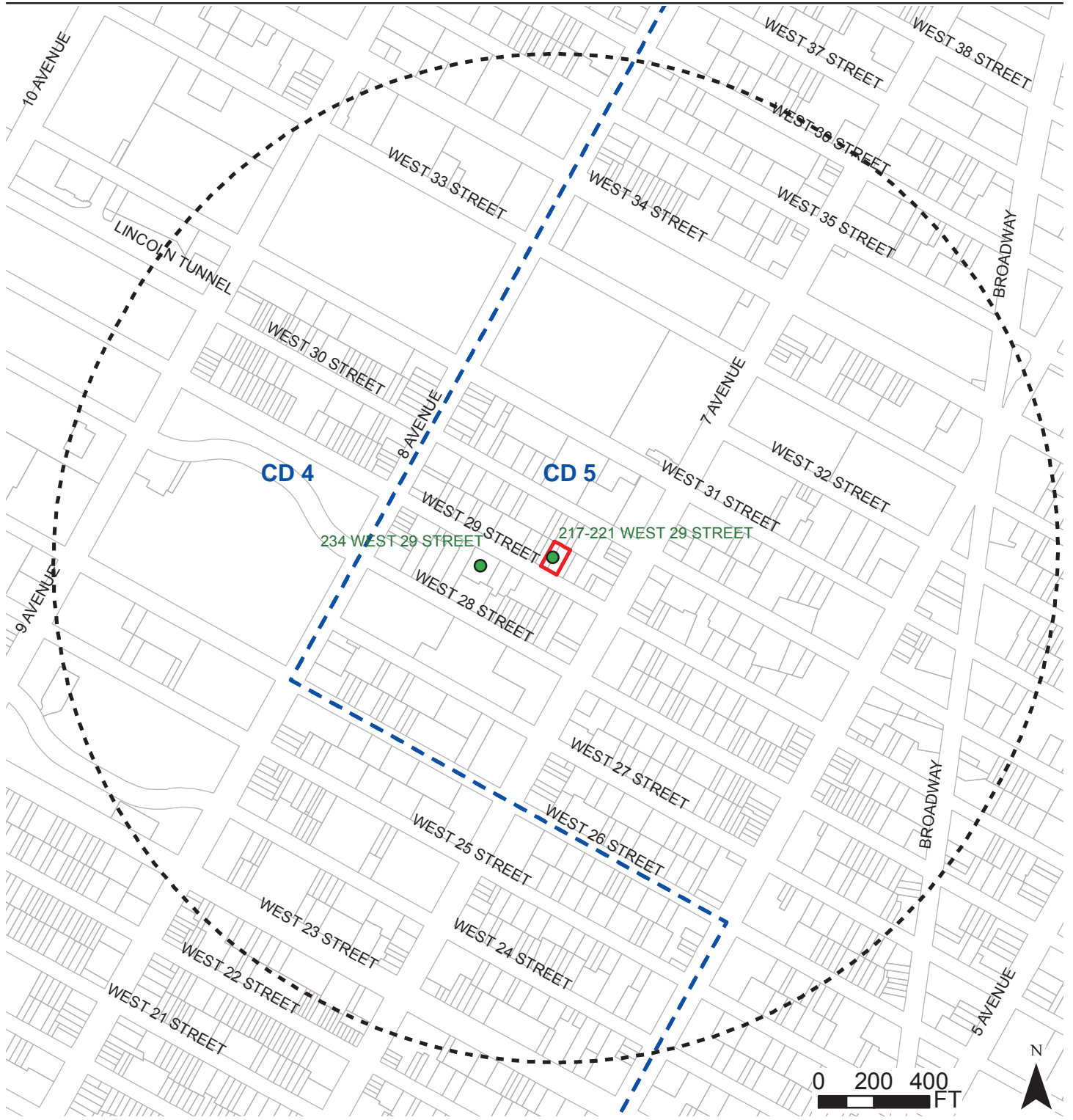
Proposed Project							
Site Location	Parking Spaces Proposed	Residential Units Proposed	Permitted AOR Parking Spaces	Parking Spaces Requested via Special Permit			
217-221 West 29th Street	45	95	19	26			
Associations							
Site Location/Type of Association (A, B or C)*	Distance: Project Site to Association Site (ft)	No. of Spaces Associating	Type B: DCA Lost Residential Parking Spaces		Type C: Self-Association of Lost Residential Parking Spaces On-Site		
			Loss in DCA Capacity For Lookback Period	Loss in DCA Residential Parking Capacity for Lookback Period	DCA Capacity	DCA Residential Parking Capacity	Expected Loss In Residential Capacity
217-221 West 29th Street (Type C)	0	12	-	-	48	12	12
234 West 29th Street (Type B)	260	14	70	17	-	-	-
TOTAL	-	26	-	-	-	-	-
*Association Types (Per DCP Associations Table Template): Type A- New Residential Development with Unbuilt Parking; Type B - DCA Lost Residential Parking Spaces; Type C -Applicant Self-Association Lost Residential Parking Spaces							

Pending Special Permits

This special parking permit analysis reflects all confirmed residential parking and residential unit change sites in the study area. However, there are some additional proposed or pending special permit applications within the study area that, if approved, could potentially be completed by 2017. Through consultation with DCP, the following three pending or proposed special permits have been identified:

- 241-251 West 28th Street (Parking Change Site P5) – As mentioned, a modification to the existing special permit is proposed on this site which would allow for the development of 407 residential units and 190 parking spaces.
- 340 West 31st Street – a special permit modification application is pending for this site (M 120085A ZSM) to redesign the existing public parking facility. As a result of this proposed project, the total number of parking spaces at the facility would decrease slightly from 255 to 249 spaces.
- 160 West 24th Street – A special permit is pending at this site to permit an increase of the total parking spaces within the residential building’s parking garage which currently has a capacity of 15 parking spaces. The special permit would allow the parking capacity to increase to 41 spaces.

⁴ See Table A-2 in the Appendix for a more detailed version of this table (using DCP’s Association Table template).



West 29th Street Parking Garage
New York, New York

Special Parking Permit Analysis
Associated Sites

Figure
2

- Associated Sites
- Zoning Lot
- Project Site
- 1/3-Mile Radius
- CD 4 Community District ID

Sources:
1. New York (City). Dept. of City Planning 2013. Manhattan Map/PLUTO (Edition 13v2). New York City: NYC Department of City Planning.
2. New York (City). Dept. of City Planning 2013. LION (Edition 13C). New York City: NYC Department of City Planning.

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In total, if all three pending special permits were to be approved and the proposed projects were to be completed by 2017, it would result in an increase of 407 residential units and approximately 215⁵ residential parking spaces. With these projects in place, the number of parking spaces per residential unit would increase from 0.09 to 0.15 without the proposed project, and from 0.11 to 0.16 with the proposed project. While the overall background residential parking growth would be higher in this scenario, it would still be below DCP's target ratio of 0.20 spaces per unit, and the overall increase created by the proposed project would be similar. Therefore, even if all proposed projects with pending special permits were added to this parking growth analysis, the overall findings would be the same.

Conclusion

The proposed project seeks to create a 45-space public parking garage that would exceed the maximum as-of-right accessory parking allowance by 26 spaces but would not create a net increase in the number of public parking spaces operating on-site as compared to existing conditions. The special parking permit residential parking analysis concludes that the overall residential parking growth ratio for the study area would be well below the target ratio of 0.20 residential parking spaces per dwelling unit with the proposed project in place. Additionally, all proposed public parking spaces on the proposed site would be associated with eligible association sites. Therefore, the proposed additional public parking spaces are reasonable, and not excessive in relation to recent trends in the study area. The Garage, as proposed, meets the parking space criteria for a special parking permit under the DCP Guidelines. Additionally, even if all proposed projects within the study that have pending special permits were added to this parking growth analysis, the overall findings would be the same.

⁵ 190 new residential spaces from the 241-245 West 28th Street project, plus 26 new residential spaces from the 160 West 24th Street project (increase from 15 to 41 spaces), minus 2 residential spaces from the 340 West 31st Street project (decrease 6 spaces overall [from 255 to 249] x 30% residential usage rate for CD 4 = decrease of 2 residential spaces).

APPENDIX

Table A-1
REMOVED DCA PARKING CHANGE SITES

BBL	CD	Street Number	Street Name	Approximate Distance from Project Site	DCA Parking Spaces Lookback	% of Residential Spaces Lookback	Total # of Residential Spaces Lookback	DCA Total Parking Spaces Current	% of Residential Spaces Current	Total # Residential Spaces Current	Net Change in DCA Resi Spaces	Notes
1007540044	104	300	WEST 31ST STREET	855	27	30%	8	36	30%	11	3	Not a change site. This site has two separate DCA licenses and capacities on-site -- one for 27 spaces and one for 36 spaces. See Certificate of Occupancy, License placard photograph (May 2014), and historical aerial photographs.
1007990000	104	160	WEST 24TH STREET	1510	15	30%	5	15	30%	5	0	These are on the same site. The 93-spaces is information from an outdated Certificate of Occupancy (1967). The site was redeveloped and has only had 15 accessory parking spaces since 1995 (the latest Certificate of Occupancy available on DOB site). Therefore, it has not been a DCA-licensed site during the entire lookback period, and is not a change site.
1007990070	104	154-164	WEST 24 STREET	1530	93	30%	28	0	30%	0	-28	According to DCA- historical data set, listed as a 225-space garage prior to 2005, changed ownership (from 241 Parking Corp to Tori Operating Group) and listed as 120-space garage, then later listed as a 225-space garage again
1007760010	104	241	WEST 26 STREET		120	30%	36	225	30%	68	32	Not a change site. DCA Lic. 1099887 parking facility still active
1008060070	105	148	WEST 31 STREET		18	24%	4	0	24%	0	-18	

