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220 CENTRAL PARK SO.: ZR 13-451, SPECIAL PERMIT FINDINGS NARRATIVE RESIDENTIAL GROWTH PARKING STUDY ANALYSIS

22 June 2017

Background and Summary of Findings:

This report summarizes the analysis of residential growth and off-street parking changes within and in the vicinity of Midtown Manhattan pursuant to Section 13-451 of the NYC Zoning Resolution (Special permit for additional spaces for residential growth, or "Special Permit"). The analysis is in support of an application ("Application") by 228 West 58th LLC, an affiliate of Vornado Realty Trust to the City Planning Commission ("CPC") for a 64-space below-grade parking garage ("Proposed Project") within a mixed-use building being developed at 220 Central Park South, Block 1030, Lots 15, 16, 17, and 19 ("Site"). The site is located midblock on Central Park South (W. 59th Street) between Seventh Avenue and Broadway, although its zoning lot also includes properties with frontage on Broadway and W. 58th Street.

The required analyses found that the 64 spaces proposed by the applicant are reasonable and not excessive in relation to recent trends within close proximity to the proposed development site. In addition to the applicant's planned 118 DUs on the development site, there has been a net increase of over 2,400 housing units (in new construction, expansions, and conversions) within the prescribed one-third mile study area ("Study Area") surrounding the development site during the 10-year lookback period and extending until 2018 (the proposed project's build year), during which there has been a net increase of 384 off-street residential parking spaces (including an increase due to new spaces in residential developments which was partly offset by the elimination of spaces from existing facilities), plus an additional 42 residential spaces on the development site that have been eliminated. Using the Department of City Planning's methodology, the analysis found that with the study area's net change in the supply of residential parking spaces, the study area's net increase in the number of residential units, and the proposed 64-space special permit, the ratio of change in residential parking spaces to change in residential units would be 15.53 percent (+16.50%) and thus does not exceed the 20 percent (+20%) target growth parking ratio for the development site and most of the study area developments. The applicant has also identified associated sites for the proposed 64 spaces.

Methodology

In order to quantify the residential growth parking ratio for the Study Area surrounding the site, residential parking change and residential unit change analyses were prepared in accordance with the methodology set forth by the Department of City Planning ("DCP") "Section 13-451 (Additional parking spaces for residential growth) Special Permit Application Guidelines Version 3.0, dated 30 October 2014 (hereafter "the Guidelines").

Study Area

The Study Area is defined as a one-third mile radius from the edge of the proposed development's zoning lot. For this project, the study area encompasses an area that extends as far north as W. 65th Street at Central Park West, as far east as the midblock area between Fifth and Sixth Avenues, as far south as the south side of W. 52nd Street and as far west as the midblock area between Ninth and Tenth Avenues. The study area is spread across portions of Community Districts 4, 5, and 7. Refer to Figure 1.

Study Period

Per the Guidelines, the study period was defined as starting at a 10-year "look-back" prior to the application filing; as this application is being filed in 2015, the look-back period begins in 2005. The study period continues until the anticipated completion year for the proposed development, which is 2018.

Data Collection

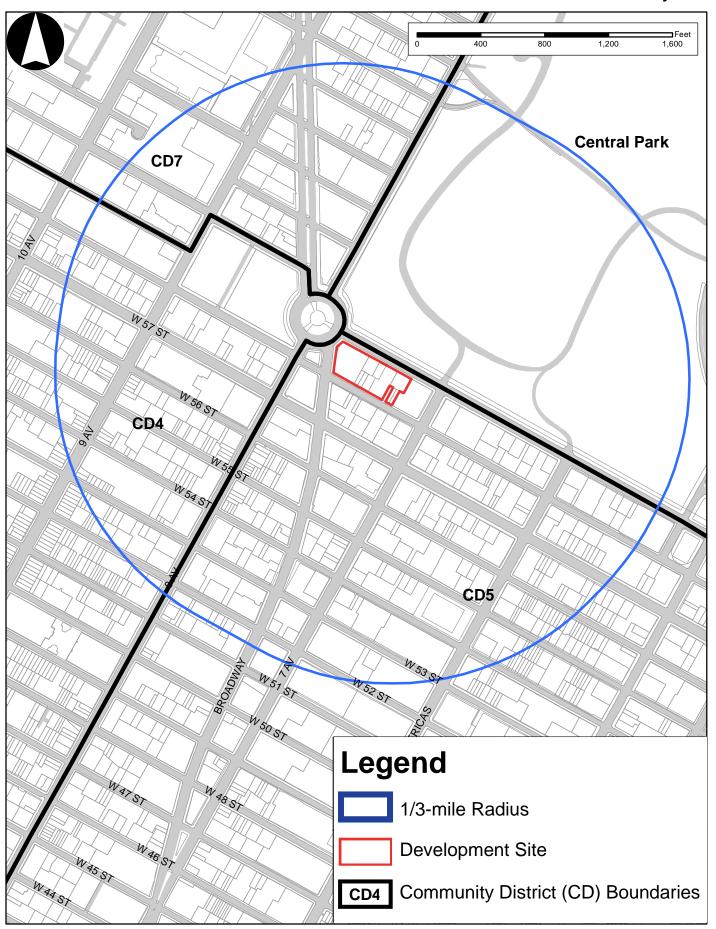
DCP provided data from the NYC Department of Consumer Affairs (DCA) on capacity changes in licensed public parking facilities and data from the NYC Department of Buildings (DOB) on new residential development (new construction and conversions) since the start of the study period. These data sets were used as a starting point for identifying all changes in residential off-street parking capacity and residential units within the Study Area during the study period. Additional data collection conducted as part of this analysis included field visits, reviews of certificates of occupancy (C of Os), building permit filings, CPC parking special permit reports, and previous environmental reviews.

Residential Parking Change Analysis

Pursuant to the Guidelines, the gross number of eliminated off-street parking spaces must be adjusted by the community district percentages of residential parking usage, as presented in DCP's Manhattan Core Public Parking Study, issued in 2009. The percentages for community districts included in the study area are 30 percent for Community District 4, 24 percent in Community District 5, and 69 percent in Community District 7. However, new parking facilities in residential or primarily residential buildings are to be considered entirely utilized by area residents, unless there are circumstances that warrant special treatment. Thus, the Residential Parking Change Analysis found that during the study period, the Study Area has experienced a loss of approximately 235 DCA licensed off-street parking spaces. This involved the elimination of two public parking facilities with a combined total of 222 spaces, of which it is estimated that 54 were residential parking spaces. In addition, one facility experienced a decrease of 18 DCA licensed parking spaces, of which it is estimated 4 were residential parking spaces. In addition there is one facility in the Study Area where the licensed capacity increased. It is a garage in a mixed residential-commercial building that according to DCA records increased its licensed capacity from 20 to 25 spaces. There are no records of a parking special permit being issued to allow increased parking and the increased capacity is not indicated on the most recent certificate of

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Study Area



occupancy. In light of these circumstances, the applicable community district percentage of spaces used by residents has been applied to the reported incremental increase in parking spaces. As such, for analysis purposes this facility is projected to have increased it residential parking by 2 spaces. Refer to Table 1 and Figure 2.

With the loss of 54 residential spaces at two locations, the reduction of 4 residential spaces from one location, and the increase of 2 residential spaces at one location, the study area experienced a net change of -56 residential parking spaces (excluding spaces in new residential and mixed use buildings accounted for in Table 2 and changes on the development site accounted for in Table 3).

There are no known new off-street parking facilities created during the study period, apart from those located in new residential developments which are discussed separately in the description of the "Residential Unit Change Analysis." Additionally, there are no known instances of non-DCA residential accessory parking spaces being eliminated in the Study Area during the study period. It should be noted that, per the Guidelines, off-street parking facilities that were already in existence as of the start of the look-back period (2005) which are still operating without a change in licensed capacity, are not considered in this analysis.

Residential Unit Change Analysis

New Residential Units

The Residential Unit Change Analysis indicates that as a result of new residential and mixed residential-commercial developments in the Study Area during the study period there has been a net increase of approximately 2,472 residential units. This reflects the development of 18 sites with residential units, ranging in size from 9 to 426 units. These include 12 developments from 2005 to 2014 and 6 completed in 2015, under construction in 2015 or expected to be completed by 2018. In terms of the type of development, 4 of the 18 are conversions of existing buildings, 1 of the 18 is a conversion/expansion of an existing building, and 13 of the 18 are new construction.

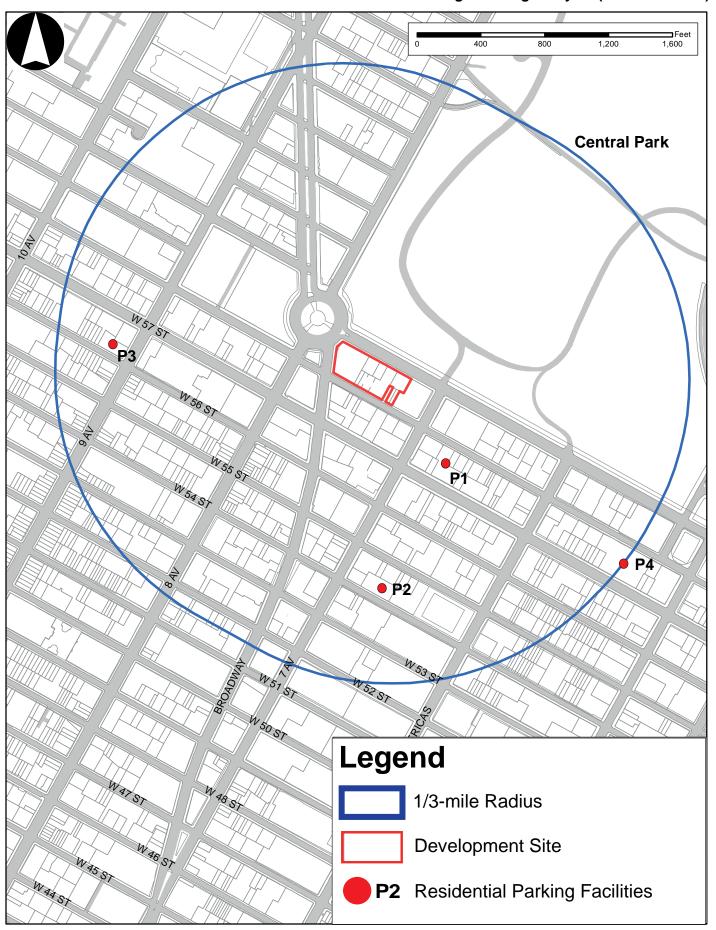
On 16 of the 18 sites there were no residential units at the beginning of the study period, while two sites had residential units at the beginning of the study period replaced as part of new buildings. In total, by the end of the study period in 2018 there will be 2,529 DUs on the 18 residential unit change sites, compared to 57 DUs at the start of the study period. As a result, as shown in the table, the study area has experienced a net increase of 2,472 DUs. Refer to Table 2 and Figure 3.

New Residential Parking in New Residential or Mixed Residential-Commercial Developments

According to the Guidelines, the target percentage (ratio) of parking spaces to residential units for the Study Area is the same as the as-of-right parking maximums for new developments in the Manhattan Core: 20 percent of units for Community Districts 1 to 6; and 35 percent for Community Districts 7 and 8. Applying the 20 percent target rate to the study area's Community District 4 and 5 developments and applying the 35 percent target rate to the study area's Community District 7 developments, the target number of residential parking spaces for the 2,529 total DUs is approximately 629; but the target number of residential parking spaces for the net increase of 2,472 DUs is approximately 618.

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Residential Change Parking Analysis (DCA Facilities)



Residential Growth Analysis

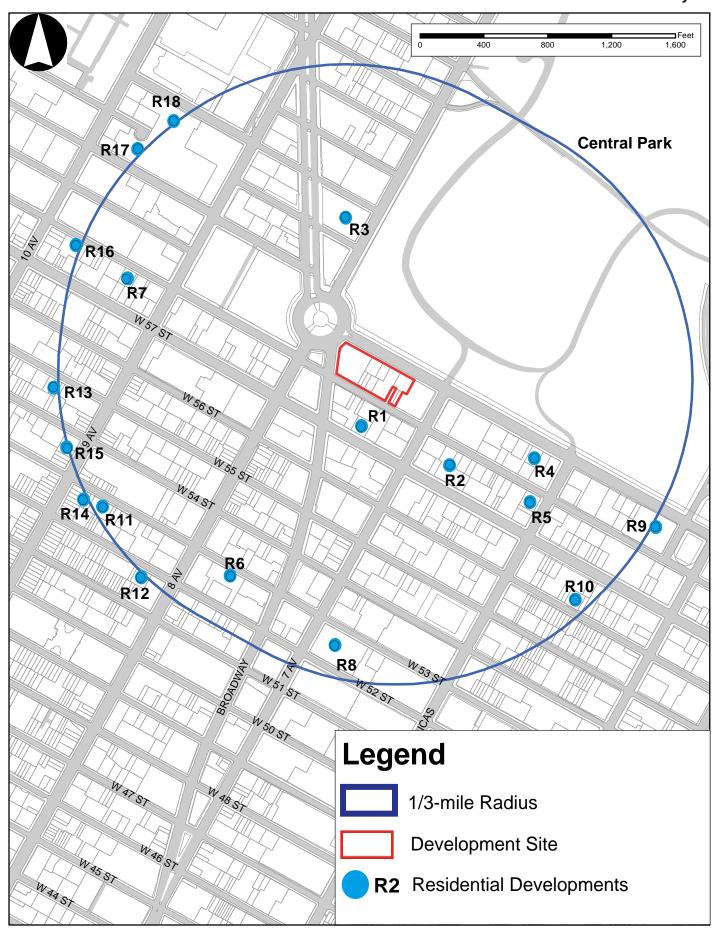


Table 1 - Residential Parking Change

Map ID	BBL	CD	Street Number	Street Name	Distance from Project Site (ft)	DCA Parking Spaces Lookback	% of Residental 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		Association (# of spaces)	Notes
*	1-01030-0017	105	225	WEST 58 STREET	n/a	129	24%	31	0	100%	0	-31		29	Part of 220 CPS Site/Under Construction
*	1-01030-0019	105	216	CENTRAL PARK SOUTH	n/a	44	24%	11	0	0	0	-11			Part of 220 CPS Site/Under Construction
P1	1-01010-7510	105	166	WEST 58 STREET	629	144	24%	35	0	0	0	-35	R1		Part of 157 W 57 St site
P2	1-01007-0010	105	143	WEST 54 STREET	1,553	78	24%	19	0	100%	0	-19			The London Hotel - Parking Converted to Avis Car Rental
Р3	1-01066-0030	104	409	WEST 56TH STREET	1,866	20	30%	6	25	30%	8	2			Increase in Capacity
P4	1-01273-0022	105	9	WEST 57 STREET	1,973	218	24%	52	200	24%	48	-4			Solow Building
Totals						460		112	225		56	-56			

^{*216} Central Park South & 225 West 58 Street are shown in this table for informational purposes only, but are not included in the total summed in this table. Per the Guidelines, they are accounted for in Table 3, in the "With Project" ratio.

NOTES

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

BBL is the Borough Block Lot number of the site with no hypens 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 difference in the number of residential parkers in the look back and currently

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

Association (# of spaces) each parking space in the proposed development must be associated with one or more residential parking changes sites or residential growth sites

Notes column should explain any edits (additions, corrections, etc.) to data and any other pertinent information (conversion, discretionary actions, etc.)

All edits, corrections, additions to the DCA and DOB data forwarded to applicant should be shown in red text on the spreadsheet

Table 2 - Residential Unit Change

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	Association (# of spaces)	Notes		
R1	1-001029-0019	105	217-227	WEST 57 STREET	58	0	233	233	47	0	47			UC, 2018		Nordstrom Tower, aka "Central Park Tower"		
R2	1-01010-7506	105	157	WEST 57 STREET	314	16	132	116	26	0	26	P1		completed 2015		One57 Tower, also a hotel in building		
R3	1-01114-7503	107	1880	BROADWAY	595	0	230	230	81	162	-81		1303384	completed 2007		Special Permit		
R4	1-01011-0038	105	112	CENTRAL PARK SOUTH	909	0	62	62	12	0	12			completed 2006		conversion; 60 or 62 not 66		
R5	1-01010-7505	105	100	WEST 58 STREET	962	0	103	103	21	0	21			completed 2006		conversion		
R6	1-01024-0052	105	242	West 53 Street	1,406	0	426	426	85	184	-99			UC, 2018		"Aro"; Sp. Pt. 170112 ZSM; was Roseland Ballroom		
R7	1-01067-7502	104	426	WEST 58 STREET	1,432	0	16	16	3	0	3			completed 2006		Conversion/expansion, "WFIFTY8 at Columbus Circ		
R8	1-01005-0013	105	135	WEST 52 STREET	1,559	0	109	109	22	0	22			UC, 2015		Conversion, was Flatotel		
R9	1-01274-7504	105	768	5 AVENUE	1,602	0	191	191	38	0	38			Completed 2008		Conversion, The Plaza Hotel (still partly hotel)		
R10	1-01272-7501	105	33	WEST 56 STREET	1,612	0	47	47	9	76	-67		1326426	completed 2009		The Centurion Condo; special permit		
R11	1-01043-7503	104	350	WEST 53 STREET	1,649	0	66	66	13	0	13			Completed 2005		The Lumiere		
R12	1-01042-0037	104	310	WEST 52 STREET	1,675	0	215	215	43	0	43			Completed 2007		"The Link"		
R13	1-01064-0044	104	424	WEST 55 STREET	1,683	0	17	17	3	0	3		n/a	UC, 2016				
R14	1-01043-7504	104	362	WEST 53 STREET	1,683	0	9	9	2	0	2			Completed 2010				
R15	1-01063-0033	104	809	NINTH AVENUE	1,684	0	10	10	2	0	2			Completed 2013				
R16	1-01067-0057	104	462	WEST 58 STREET	1,715	41	67	26	13	0	13			Completed 2009		Hudson Hill Condo		
R17	1-01132-0021	107	175	WEST 60 STREET	1,750	0	257	257	90	0	90			UC, 2016		Glenwood Tower		
R18	1-01132-0035	107	160	WEST 62 STREET	1,750	0	339	339	119	18	101			Completed 2014		Hawthorne Park		
Totals						57	2,529	2,472	629	440	189							

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 hypens 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 (build year should be stated in the notes)

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 postive or negative number)

Cross Reference to Table 1 Map ID is the Map ID of the site if it is located in Table 1

Building Status should be marked whether the building is complete, under construction (UC), build year (BY), and the year when it was/will be completed

Notes column should explain any edits (additions, corrections, etc.) to data and any other pertinent information (conversion, discretionary actions, etc.)

All edits, corrections, additions to the DCA and DOB data forwarded to applicant should be shown in red text on the spreadsheet

Table 2 also indicates that in the Study Area during the study period, four of the 18 residential development sites have included off-street parking spaces. These include a 184-space garage slated to open in 2018 in a new 426-DU building at 242 W. 53rd Street; the parking spaces will be provided pursuant to a recently approved garage special permit. Collectively, these new developments have a licensed capacity of 440 off-street residential parking spaces. With the 440 new residential parking spaces created in four of the 18 "residential growth" sites and the net reduction of 56 residential parking spaces identified in Table 1, the DCP Guidelines methodology finds that the net adjusted change in residential off-street parking capacity is a net increase of 384 spaces.

Change in Residential Parking and Residential Units due to the Proposed Project

The Proposed Project would change both the number of residential parking spaces and the number of residential units in the Study Area.

Proposed Project: Residential Parking Change

With the Proposed Project, there would be 42 residential parking spaces eliminated from two previous parking facilities on the site and 64 residential parking spaces added pursuant to the proposed special permit, resulting in a net increase of 22 residential spaces added to the development site and to the study area's overall inventory of residential parking spaces. Per the Guidelines, it is assumed that 100 percent of the added spaces would be residential parking spaces. It should be noted that the Proposed Project, with a development program of 118 residential units, would be permitted approximately 24 residential accessory parking spaces as-of-right.

Proposed Project: Residential Unit Change

Previously, there was a building complex on the development site with 130 residential units that was present at the beginning of the lookback study period. With the proposed development site's 118 additional residential units, resulting in a net decrease of 12 residential units on the development site, and the net increase of 2,472 study area DUs added during the study period without the project, the study area will experience a net increase of 2,460 study area DUs. With these 2,460 DUs, the study area would have a target number of 616 new residential parking spaces, which represents the total number of residential parking spaces that could be added before the Study Area target ratio is achieved, i.e., 20 percent for Community District 4 and 5 sites and 35 percent for Community District 7 sites (aggregated).

Residential Growth Parking Ratio

The Residential Growth Parking Ratio is calculated by dividing the net change in off-street residential parking spaces by the net change in the number of residential units in the Study Area during the study period. This ratio is calculated for "Without Project" and "With Project" conditions. As indicated in Table 3, under "Without Project" conditions, the Study Area Residential Growth Parking Ratio will be 15.53 percent. This reflects a net increase of 384 residential parking spaces and a net increase of 2,472 residential units. As also shown in Table 3, under "With Project" conditions, the Study Area Residential Growth Parking Ratio also will be

16.50 percent. This reflects an overall net increase (inclusive of changes on the development site) of 406 residential parking spaces and a net increase of 2,460 residential units. In order for the Study Area to reach the target 616 spaces of parking under "With Project" conditions, the Study Area would need to add an additional 210 residential parking spaces to the 406 residential spaces provided under "With Project" conditions.

Table 3a, Residential Growth Parking Ratio (Without Project)

A) Res		B) Res		
Change		Growth		
in		in		
Parking		Parking		
Spaces		Spaces		
(from		(from		Parking
Table 1)		Table 2)		Ratio
-56	+	440	_	15 520/
-56	+ 2,472	440	=	15.53%
-56 C) Net Cha	2,472		=	15.53%
-	2,472 nge in DU	J's (res	=	15.53%
C) Net Cha	2,472 nge in DU	J's (res	=	15.53%
C) Net Cha	2,472 nge in DU	J's (res	=	15.53%

RATIOS BASED ON 100% OF NEW SPACES BEING "RESIDENTIAL"

Formula is: $\frac{A+B}{C} = \frac{Parking}{Ratio}$

Table 3b, Residential Growth Parking Ratio (With Project)

A) Res Change in Parking Spaces (from Table 1)		B) Res Growth in Parking Spaces (from Table 2)		P1) Proposed No. of Parking Spaces		Res Parking Spaces (@ 24% of total) Eliminated by Proposed Project		Parking Ratio
-56	+	440	+	64	+	-42		
							=	16.50%
	2,472		+	-12				

RATIOS BASED ON 100% OF NEW SPACES BEING "RESIDENTIAL"

Formula is: $\frac{A + B + P1}{C + P2}$ = $\frac{Parking}{Ratio w/}$

Associated Sites

Per the Guidelines, the applicant is required to identify one or more nearby residential growth sites and/or residential parking change sites to associate with each parking space created as a result of the garage special permit. The process of selecting associated sites should begin with the sites closest to the proposed development site. Table 4 summarizes the proposed associated sites for the proposed development and Table 5 presents detailed information. As shown in the tables, the applicant is "self-associating" with the 24 residential parking spaces it is allowed as-of-right and 40 of the 42 eliminated residential parking spaces formerly on the development site. As such, there are no proposed off-site associated parking spaces.

Table 4, Summary of Proposed Associated Sites

Site	Number of Spaces
Development Site Residential Spaces Permitted As-of-right ¹	24
Development Site Residential Spaces Eliminated ²	40
TOTAL	64

As-of-right spaces calculated as follows: 118 residential units, @ 0.2 spaces/unit, rounded to the nearest whole number

² There are 42 residential parking spaces eliminated from the development site; but only 40 of the 42 are being associated with the proposed special permit.

Table 5 - Associations

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Applicant Project Name	BBL	Community District	Street Number	Street Name	Community District	Study Period	ULURP#	CPC Review Session Date	Residential Units Proposed	Parking Spaces Proposed	Permitted AOR Parking Spaces	Number of Parking Spaces to Associate	Number of Sites Associated		
220 Central Park South	1-01030-0015, 1- 01030-0016, 1- 01030-0017, 1- 01030-0019	105	220	Central Park South	105	2005-2016	-	N/A	118	64	24	40	1		

	Association Site									Type A Association Only: New Residential Development with Unbuilt Parking				Type B Association Only: DCA Lost Residential Parking Spaces			Type C Association Only: Applicant Self-Association Lost Residential Parking Spaces			
Street Number	Street Name	Community District	BBL	PlutoX	PlutoY	Distance from Project Development Site	Number of Spaces Applicant is Associating	10 Year Association End Date	Map ID Number from Table 1 and/or Table 2	Year Built	Residential	Number AOR Accessory Parking Spaces	Accessory	Number of Unbuilt Accessory Parking Spaces		Difference in DCA Residential Parking Capacity for	DCA Capacity	DCA Residential Parking	Expected Loss In Residential Capacity	1
225	WEST 58 STREET	105	1-01030-0017	989583	218699	n/a	40	2026	n/a	2016	118	24	0	24	N/A	N/A	173	42	42	

Type C. Applicant Self-Association Lost Residential Parking Spaces, for example, if there was a 100 space parking lot on the development site, applicant would take the appropriate percentage of residential parking spaces and self-associate those spaces Applicant can associated with multiple sites and multiple types.

 $\textbf{Map ID} \ is \ the \ identification \ number \ of \ the \ site \ that \ has \ a \ change \ in \ the \ number \ parking \ spaces$

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

Pluto X and Y coordinates for mapping and site identification

 $\textbf{Distance from Project Site} \ \text{is measured in feet and sorted from closest to furthest from applicant's site} \\$

Number of Spaces Applicant is Associating is the total number of spaces associated; applicant cannot leave unassociated spaces at multiple sites

10 Year Association End Date is 10 years from the date when the associated site created new residential development or lost residential parking spaces

Map ID is the ID number from Table 1 and / or Table 2 maps and spreadsheets

Notes column should contain any pertinent data and information