



AKRF, Inc.
Environmental, Planning, and Engineering Consultants
440 Park Avenue South
7th Floor
New York, NY 10016
tel: 212 696-0670
fax: 212 213-3191
www.akrf.com

Memorandum

To: Stephen A. Johnson, NYC Department of City Planning
From: Alex Lieber and Lisa Lau
Date: June 27, 2017
Re: Kips Bay—Residential Growth Parking Study
cc: Robert Jacobs and Vladimir Favilukis, Belkin Burden Wenig & Goldman, LLP

This memorandum summarizes the study prepared by AKRF, Inc., in support of the application by the Kips Bay Towers Condominium for two (2) special permits pursuant to Zoning Resolution (ZR) Sections 13-45 (Special Permits for Additional Parking Spaces) and 13-455 (Additional Parking Spaces for Existing Accessory Off-Street Parking Facilities) to allow an increase in the capacity of two existing parking facilities accessory to the Kips Bay Towers residential complex, located on the parcel of land bounded by East 33rd Street to the north, East 30th Street to the south, First Avenue to the east, and Second Avenue to the west (Block 936, Lot 7501; the “project site”) in Manhattan. The project site is located on one zoning lot within the Manhattan Core area as defined by the ZR, and is therefore subject to special parking regulations pursuant to Article I, Chapter 3 of the ZR.

The existing parking facilities on the project site are comprised of two open parking areas, each of which contains fifty (50) permitted accessory spaces: the North Parking Area, which serves the North Tower of the complex, and the South Parking Area, which serves the South Tower. The proposed special permits (one for each parking facility) would allow a total of 37 spaces to be added to the parking facilities without any increase needed in the size of the facilities. This parking study is intended to demonstrate that the proposed parking facilities meet the findings required under ZR 13-455(a), which permits such increase provided the finding of subsection (a) of ZR 13-451 (Additional Parking for Residential Growth) is met. Such finding requires that “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.” Since two special permits are being contemporaneously requested for the two parking facilities on the project site, this study will evaluate whether the total number of off-street parking spaces being proposed for the parking facilities is reasonable and not excessive in relation to recent trends in close proximity to the project site.

Following guidance provided by the Department of City Planning (DCP) for special permit applications pursuant to ZR Sections 13-45 and 13-455 (with respect to the findings required under ZR 13-451[a]), the study calculated (1) the number of new residential units, in both new developments and conversions, added to an area within a 1/3-mile radius of the project site (the “study area”) between 2005 and 2015 (the “lookback period”); (2) changes in the parking capacity in the study area during the lookback period in both public parking facilities licensed by the Department of Consumer Affairs (DCA) and non-DCA

licensed parking facilities accessory to residential buildings; (3) projected parking capacity and residential growth within the study area resulting from future development projects; and (4) the effect of the proposed addition of parking spaces in both parking facilities relative to residential growth within the study area.

A. METHODOLOGY

STUDY AREA

The study area for the residential growth parking study includes the area located within a 1/3-mile radius of the project site. As shown in **Figure 1**, the study area is roughly bounded by East 40th Street to the north, the East River to the east, East 23rd Street to the south, and Park Avenue to the west. This study area includes portions located in Community District 5 (CD5, also shown as 105 on all tables) and Community District 6 (CD6, also shown as 106 on all tables).

STUDY PERIOD

The study period for the analysis includes both a 10-year lookback period (2005-2015) and a projected future development period extending to the build year for the proposed project. Because the proposed additional parking spaces in the two facilities on the project site would be accessory to the existing residential facility (which is served by both parking facilities and would remain in its current condition with no additional residential units), there is no build year for the proposed project. For the purposes of this study, residential projects identified by the data provided by DCP (described below) as currently under construction were included as projected future development in the study area with an assumed build year of 2018.

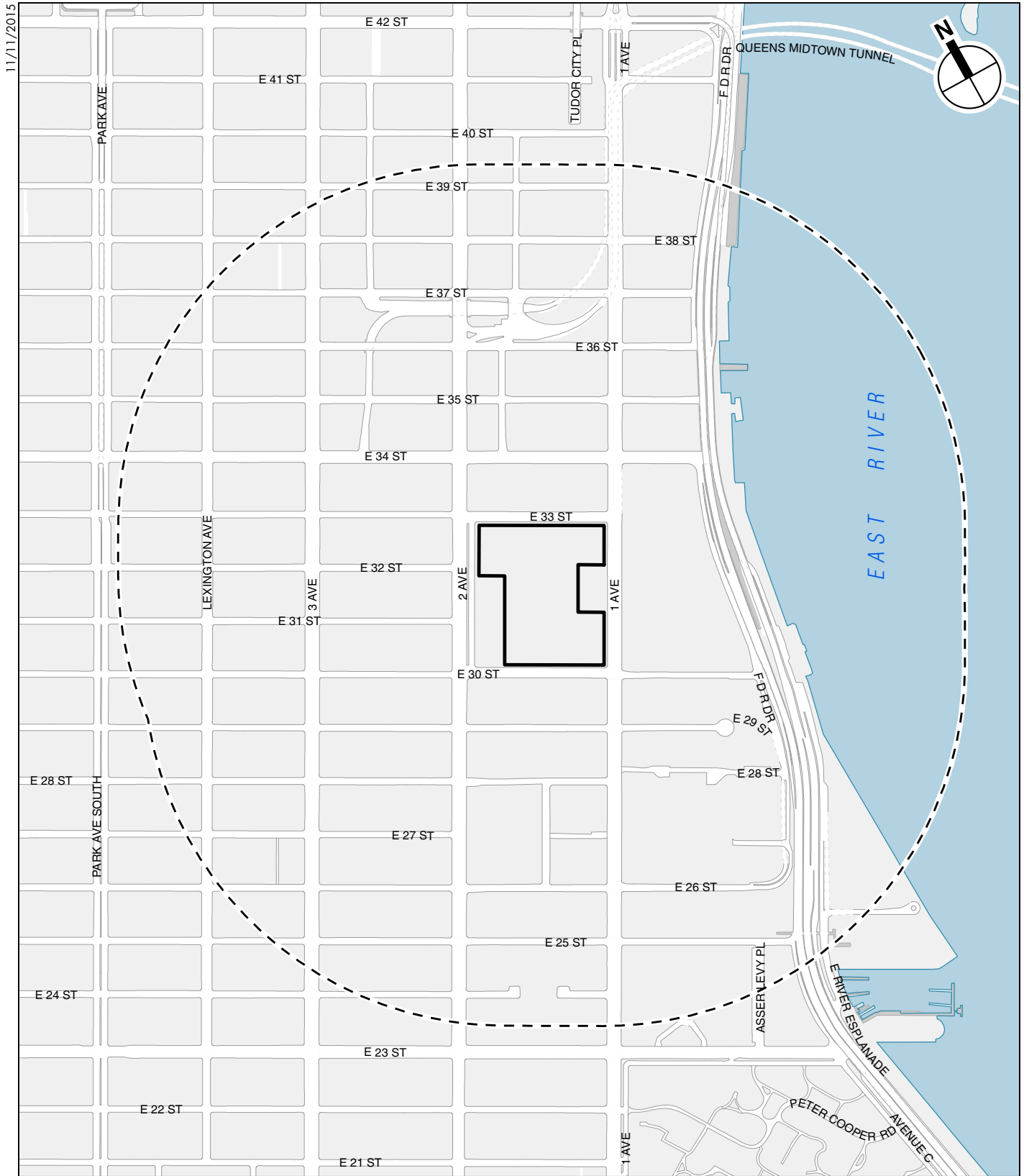
RESIDENTIAL GROWTH

Following DCP guidelines, the study calculated the change in the number of residential units within the study area during the study period using data provided by DCP reflecting new building permits and Certificates of Occupancy (COs) issued by the Department of Buildings (DOB) during the lookback period. Supplemental research was performed using DOB's Buildings Information System (BIS) to identify additional residential developments completed during the lookback period. Records of recently issued DOB permits and other online resources were reviewed to identify projects under construction or otherwise expected to be complete by 2018.

PARKING CAPACITY

Changes to the capacity within licensed public parking facilities over the lookback period were determined using the "change sites" data provided by DCP. These data were verified by reviewing DOB records to identify capacity lost through the redevelopment of parking facilities and capacity added through the introduction of new parking facilities, as well as to associate parking change sites with residential growth sites. Additionally, DOB records reviewed during the residential growth research were used to identify accessory parking facilities (i.e., non-licensed facilities) located within new or converted residential buildings, as well as parking facilities expected to be introduced with projected residential developments.

Following DCP guidelines, the percentage of public parking spaces that were/are used by local residents was calculated for each facility (24 percent for facilities in CD5 and 44 percent for facilities in CD6). Facilities introduced with new residential developments were assigned a 100 percent residential use rate.



11/11/2015



- Project Site
- Study Area (1/3-Mile Radius)

0 1,000 FEET

B. FINDINGS

PARKING CAPACITY CHANGE

LOOKBACK PERIOD

As shown on **Table 1** and **Figure 2**, during the study period there were 10 facilities listed in DCP's dataset as having a change in parking capacity. At one site, 685 First Avenue, a 150-space lot formerly used by Con Edison as a parking and storage area for an adjacent substation was converted into public spaces. Con Edison disposed of the site as part of the First Avenue Properties development project described above. The 620-space garage located at 450 East 29th Street was introduced with the Alexandria Center for Life Sciences, a large medical research facility constructed on Hospital Row on the east side of First Avenue (between the campuses of Bellevue Hospital and NYU Langone Medical Center).

As described above, the number of residential parking spaces gained or lost as a result of the changes in parking capacity was determined by applying residential parking ratios of 24 percent for facilities located in CD5, 44 percent for facilities located in CD6, and 100 percent for new facilities introduced with new residential buildings. Prior to construction of the Alexandria Center, a portion of that site was occupied by two surface parking lots with a total of 310 parking spaces utilized by the Health and Hospitals Corporation (HHC). The 620-space Alexandria Center garage was designed to replace parking capacity on the site lost with the construction of the Alexandria Center and to accommodate demand generated by the Alexandria Center¹; therefore, consistent with and pursuant to the special permit for the accessory parking garage, the spaces were included (and certified as needed) in the Alexandria Center to accommodate workers or visitors to the Bellevue Hospital campus and the Alexandria Center. Based on visits to the garage and discussions with the garage operator by AKRF, Belkin Burden Wenig & Goldman, LLP, and DCP personnel, it was confirmed that all spaces are used by hospital personnel and that there is no residential parking. Therefore, pursuant to the DCP findings with regard to the Alexandria Center, the parking capacity change analysis does not include any spaces in the Alexandria Center garage as residential parking spaces.

In addition, supplemental research using DOB records determined that four of the other identified parking capacity change sites—135 East 33rd Street, 560 Third Avenue, 322-334 Third Avenue, and 222 Lexington Avenue—contained parking facilities prior to the start of the lookback period. These sites may have been listed as parking change sites as a result of accessory parking spaces being converted to public spaces, and therefore did not result in changes to the residential parking capacity within the study area. As shown on **Table 1**, applying the residential parking ratios and accounting for sites with no residential spaces and no changes in parking capacity, it was determined that the study area saw a net decrease of 15 residential spaces during the lookback period.

PROJECTED PARKING CAPACITY CHANGE

As discussed below, a residential project at 626 First Avenue is expected to include a garage containing 252 spaces. Because the garage will be located within a residential building, (100 percent parking

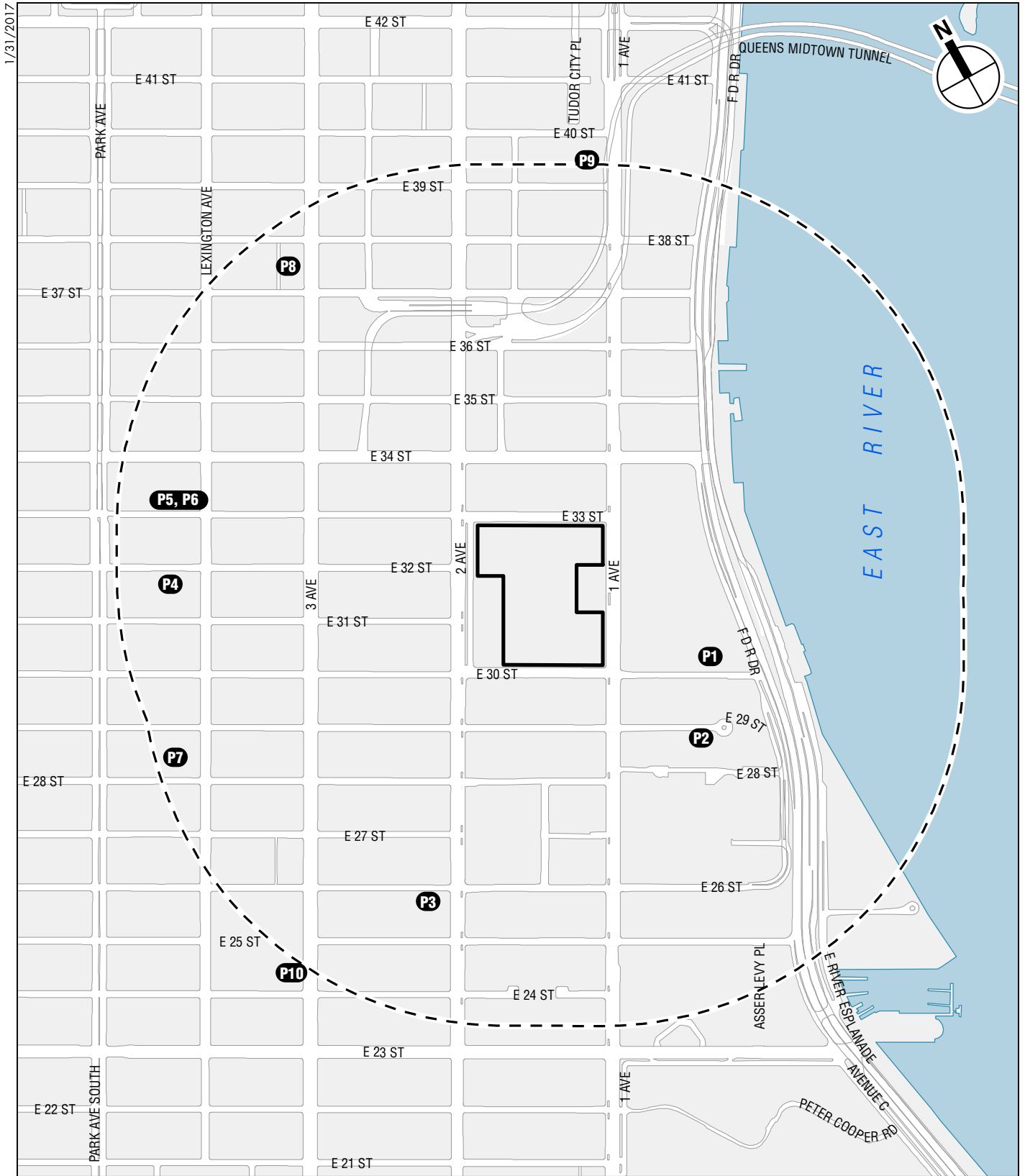
¹ The 2001 *East River Science Park Final Environmental Impact Statement (FEIS)* analyzed a proposed 1.5 million-gross-square-foot (gsf) development, including the adaptive reuse of a then-existing 353,000-gsf Psychiatric Building and the construction of three new biotechnology facility buildings, and a total of 720 accessory parking spaces (including the replacement of the 310 HHC parking spaces). The 2001 *FEIS* identified a parking shortfall of 26 and 289 spaces during the weekday AM and midday peak periods with that proposed development program. (See Attachment 1.) To date, a 310,000-square-foot (sf), 15-floor LEED® Gold facility of class A laboratory and office space and 620 parking spaces have been completed; an additional 410,000-sf laboratory and office building is nearing completion.




Table 1 - Residential Parking Change

Map ID*	BBL	CD	Street Number	Street Name	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	Cross Reference Table 2 Map ID	Association (# of spaces)	Notes
P1	1009627500	106	400-424	EAST 34 STREET	861	128	44%	56	0	44%	0	-56	~	10	
P2	1009620100	106	450	EAST 29 STREET	1,037	0	44%	0	620	0%	0	0	~	~	Alexandria Center for Life Sciences
P3	1009060040	106	242-246	EAST 26 STREET	1,596	38	44%	17	0	44%	0	-17	~	~	
P4	1008870080	105	122	EAST 32 STREET	1,802	45	24%	11	0	24%	0	-11	~	~	
P5	1008890020	105	135	EAST 33 STREET	1,818	125	24%	30	125	24%	30	0	~	~	
P6	1008890020	105	222	LEXINGTON AVENUE	1,818	125	24%	30	125	24%	30	0	~	~	
P7	1008840110	105	119-125	EAST 28 STREET	1,951	125	24%	30	138	24%	33	3	~	~	
P8	1008930040	106	560	THIRD AVENUE	1,998	300	44%	132	300	44%	132	0	~	~	
P9	1009450020	106	685	FIRST AVENUE	2,094	0	44%	0	150	44%	66	66	~	~	Public lot on former Con Edison Site
P10	1008800040	106	322-334	THIRD AVENUE	2,207	42	44%	18	42	44%	18	0	~	~	
Totals					~	928	~	324	1500	~	309	-15	~	10	

*See Figure 2

** Site with lost parking capacity associated with 550 Washington Street parking application



-  Project Site
-  Study Area (1/3-Mile Radius)
-  Parking Change Site

0 1,000 FEET

capacity ratio), all 252 spaces are assumed to be residential spaces. With this additional capacity, the residential parking capacity change for the study period is a net increase of 237 spaces.

RESIDENTIAL GROWTH

LOOKBACK PERIOD

During the lookback period (2005-2015), there were 10 new residential buildings constructed and six buildings that underwent conversion to residential use. The conversions largely consisted of the rehabilitation of older commercial buildings. The new buildings were multi-family apartment buildings built on vacant land, or on land previously occupied by parking facilities or small commercial properties, including a 191-unit building at 225 East 34th Street, a 131-unit building at 303 East 33rd Street, and a 144-unit building at 554 Third Avenue.

Through the conversion of existing buildings and the construction of new residential buildings, there was a net increase of 721 residential units within the study area during the study period. **Table 2** lists the buildings constructed or altered during the lookback period, and **Figure 3** shows their locations.

PROJECTED RESIDENTIAL GROWTH

The study area contains six projects currently planned or under construction that are expected to result in additional residential growth, also shown on **Table 2** and **Figure 3**. The largest project—626 First Avenue—is located on a parcel formerly owned by Con Edison, which was disposed to a private developer in 2008 as part of the First Avenue Properties large-scale mixed-use project. The project at 626 First Avenue is expected to introduce 761 residential units, as well as a garage containing 252 spaces. The projected residential developments are expected to introduce a total of 973 units; therefore, the total residential growth for the study period is 1,694 units.

C. RESIDENTIAL GROWTH PARKING RATIOS

BACKGROUND RESIDENTIAL GROWTH PARKING RATIO

Absent the proposed increase in parking capacity in the two parking facilities on the Kips Bay Towers site, for the study period, the residential unit change is 1,694 units. The change in residential parking capacity for the study period is an increase of 237 spaces, including the projected 252 spaces at 626 First Avenue. Therefore, the residential growth parking ratio is +14 percent.

PROPOSED PROJECT RESIDENTIAL GROWTH PARKING RATIO

With the addition of 37 new spaces in the two Kips Bay Towers parking facilities (all of which would be residential spaces), the change in residential parking capacity for the study period would be an increase of 274 spaces. The proposed project would not alter the number of residential units in the Kips Bay Towers complex, and the residential unit change would remain 1,694 units. Therefore, the residential growth parking ratio would increase to +16.2 percent.

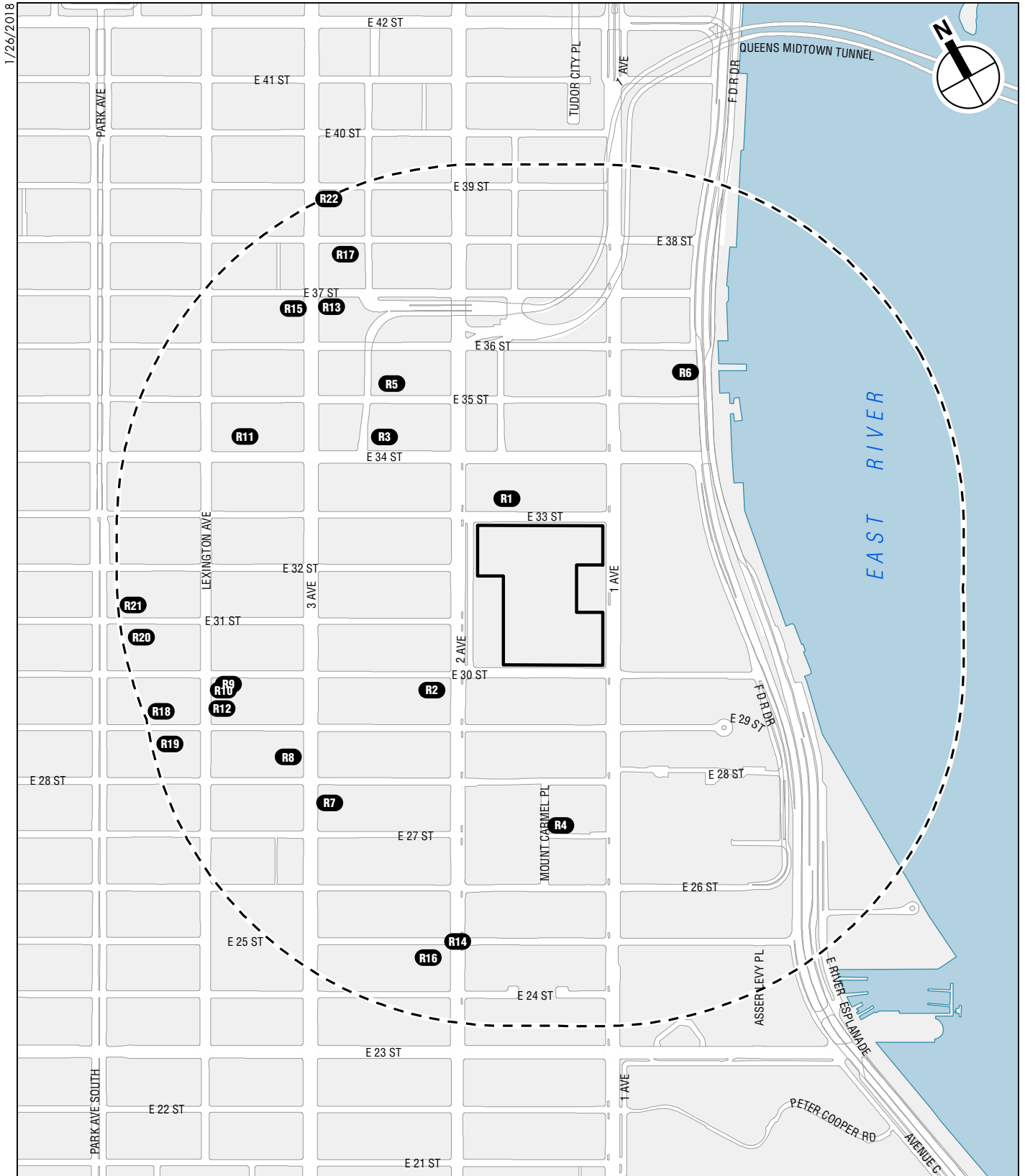
D. ASSOCIATED SITES

Following DCP guidelines, the proposed additional parking spaces in the two facilities on the Kips Bay Towers site have been associated with nearby sites containing unbuilt as-of-right parking spaces or lost parking spaces to ensure that these sites are not used again in later residential growth special permits. As shown on **Table 3**, the 37 aggregate additional parking spaces in the two facilities have been associated with three nearby sites that contain residential developments with unbuilt parking spaces or lost parking capacity.

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	1009397500	106	303	EAST 33 STREET	484	0	131	131	26	0	26	~	~	2010	26	
R2	1009100040	106	248	EAST 30 STREET	719	0	4	4	1	0	1	~	~	2018	1	
R3	1009157500	106	225	EAST 34 STREET	1072	0	191	191	38	0	38	~	~	2007	~	
R4	1009330010	106	335	EAST 27 STREET	1131	0	55	55	11	0	11	~	~	2018	~	
R5	1009160020	106	229	EAST 35 STREET	1244	0	9	9	2	0	2	~	~	2005	~	
R6	1009670000	106	626	FIRST AVENUE	1262	0	761	761	152	252	-100	~	~	2018	~	
R7	1009087500	106	385	THIRD AVENUE	1451	0	49	49	10	0	10	~	~	2007	~	
R8	1008840040	106	400	THIRD AVENUE	1471	0	30	30	6	0	6	~	~	2005	~	
R9	1008857500	106	132	EAST 30 STREET	1586	0	10	10	2	0	2	~	~	2013	~	
R10	1008850070	106	155	LEXINGTON AVENUE	1619	1	1	0	0	0	0	~	~	2010	~	Converted building
R11	1008907500	106	143	EAST 34 STREET	1627	0	28	28	6	0	6	~	~	2008	~	
R12	1008857500	106	145	LEXINGTON AVENUE	1653	0	12	12	2	0	2	~	~	2008	~	
R13	1009170060	106	555	THIRD AVENUE	1715	0	3	3	0	0	0	~	~	2010	~	Converted building
R14	1009310020	106	325	EAST 25 STREET	1740	0	56	56	11	0	11	~	~	2018	~	
R15	1008927500	106	554	THIRD AVENUE	1825	0	144	144	29	0	29	~	~	2005	~	
R16	1009050040	106	242	EAST 25 STREET	1853	0	54	54	11	0	11	~	~	2006	~	
R17	1009180060	106	204	EAST 38 STREET	1890	0	6	6	1	0	1	~	~	2018	~	
R18	1008857500	105	117	EAST 29 STREET	1935	0	16	16	0	0	0	~	~	2007	~	Converted building
R19	1008847500	105	118	EAST 29 STREET	1949	0	25	25	0	0	0	~	~	2006	~	Converted building
R20	1008860080	105	108	EAST 31 STREET	1955	0	4	4	0	0	0	~	~	2005	~	Converted building
R21	1008877500	105	107	EAST 31 STREET	1985	0	15	15	0	0	0	~	~	2008	~	Converted building
R22	1009190060	106	200	EAST 39 STREET	2162	0	91	91	18	0	18	~	~	2018	~	
Study Period Totals						1	1,695	1,694	326	252	74	~	~	~	27	

* See Figure 3



-  Project Site
-  Study Area (1/3-Mile Radius)
-  Residential Growth Site

Residential Growth Sites
Figure 3

E. CONCLUSION

Absent the proposed increase in capacity in the two Kips Bay Towers parking facilities, the residential growth parking ratio for the study area during the study period would be +14 percent, which is below 20 percent (the permitted number of parking spaces per dwelling unit for CD5 and CD6 under the Manhattan Core regulations). With the proposed increase in capacity of the two existing parking facilities, the residential growth parking ratio would increase to +16.2 percent, but would remain below 20 percent (see **Table 4**). Therefore, the proposed increase in capacity would not result in a significant increase in the parking capacity within the study area relative to residential growth, and in keeping with ZR 13-45 and 13-455 (with respect to the findings required under ZR 13-451[a]), the number of additional spaces in the parking facility is reasonable and not excessive in relation to recent trends within the study area.

Table 4
Residential Growth Parking Ratios

	DCA-Licensed Parking Capacity Change	Accessory Parking Capacity Change	Residential Unit Change	Residential Growth Parking Ratio*
Background	-15	252	1,694	14.0%
Proposed Project	-	37	-	-
With Action Total	-15	289	1,694	16.2%
Notes:	* Residential Growth Parking Ratio = (DCA-Licensed Parking Capacity Change + Accessory Parking Capacity Change) / Residential Unit Change.			

*

Table 3 - Associations

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
Kips Bay Towers	1009367501	106	333	EAST 30 STREET	106	2005-2018	TBD	TBD	N/A	137	100	37	3

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			Notes
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	Number of Residential Units	Number AOR Accessory Parking Spaces	Number of Accessory Parking Spaces	Number of Unbuilt Accessory Parking Spaces	Difference in DCA Capacity For Lookback Period	Difference in DCA Residential Parking Capacity for Lookback Period	DCA Capacity	DCA Residential Parking Capacity	Expected Loss In Residential Capacity	
303	EAST 33 STREET	106	1009397500	991043	210333	484	26	2020	R1	2010	131	26	0	26						
248	EAST 30 STREET	106	1009100040	990280	209698	719	1	2028	R2	2018	4	1	0	1						
400-424	EAST 34 STREET	106	1009627500	991534	209192	861	10	-	P1						-128	-56				46 spaces remain available for future association
Total							37													