



## **Philip Habib & Associates**

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**TO:** NYC Department of City Planning

**FROM:** Philip Habib & Associates

**DATE:** October 20, 2014

**PROJECT:** 180 Orchard Street (PHA #0931)

**RE:** Supplementary Parking Technical Memorandum

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### **Introduction**

A Parking Technical Memorandum was prepared by Philip Habib & Associates (PHA) and submitted to the New York City Department of City Planning (DCP) on November 29, 2013, as part of a draft application for a special permit pursuant to New York City Zoning Resolution (ZR) Section 13-451 for additional parking spaces for residential growth at 180 Orchard Street (attached as Appendix A). As part of its comments on the draft application, dated January 2, 2014, and in subsequent communications, DCP provided a set of revised Special Permit Application Guidelines and related data from the New York City Department of Buildings (DOB) and the New York City Department of Consumer Affairs (DCA) and asked the applicant to review this information and verify that the proposed number of off-street parking spaces would be reasonable and not excessive in relation to recent development trends in the vicinity of the development site.

An analysis of the data provided by DCP and other data collected by PHA, performed in accordance with the updated DCP guidelines, supports the conclusion of the previously prepared parking study. During the 11-year study period, the study area experienced a net increase of 1,993 housing units and a net decrease of 114 DCA and other parking spaces. Using the methodology set forth in the DCP Guidelines, it was determined that the number of available off-street parking spaces is not sufficient to meet the demand for parking resulting from the increase in residential units in the area, thus confirming the findings of the previous study.

### **Methodology**

A residential parking change analysis and a residential unit change analysis were prepared in order to identify the residential growth parking ratio for the study area per the “Section 13-451 (Additional parking spaces for residential growth) Special Permit Application Guidelines, Version 2.9, modified 4/28/2014” (hereafter, “the Guidelines”).

### *Study Area and Period*

Per the Guidelines, the study area was defined as a one-third mile radius of the boundary of the development site. This encompasses an area that extends as far north as the north side of East 6<sup>th</sup> Street, as far east as Pitt Street and Avenue C, as far south as the south side of Grand Street, and as far west as the west side of Elizabeth Street (Refer to Figure 1). The majority of the study area is located within Community District 3, including the development site. All identified residential developments and parking facilities in the study area are within Community District 3. The study period was defined as starting at a 11-year “look-back” (between 2003 and 2014) prior to the application filing and ending at the projected conditions during the anticipated completion year for the proposed garage, which is late 2015.

### *Data Collection*

The New York City Department of City Planning (DCP) provided data from the New York City Department of Consumer Affairs (DCA) on capacity changes in licensed public parking facilities and data from the New York City Department of Buildings (DOB) on new residential developments in the study area since the start of the study period. Additional data collection conducted as part of the analysis included field visits by PHA, and reviews of certificates of occupancy (C of Os), building permit filings, CPC parking special permit reports, and previous environmental reviews when available.

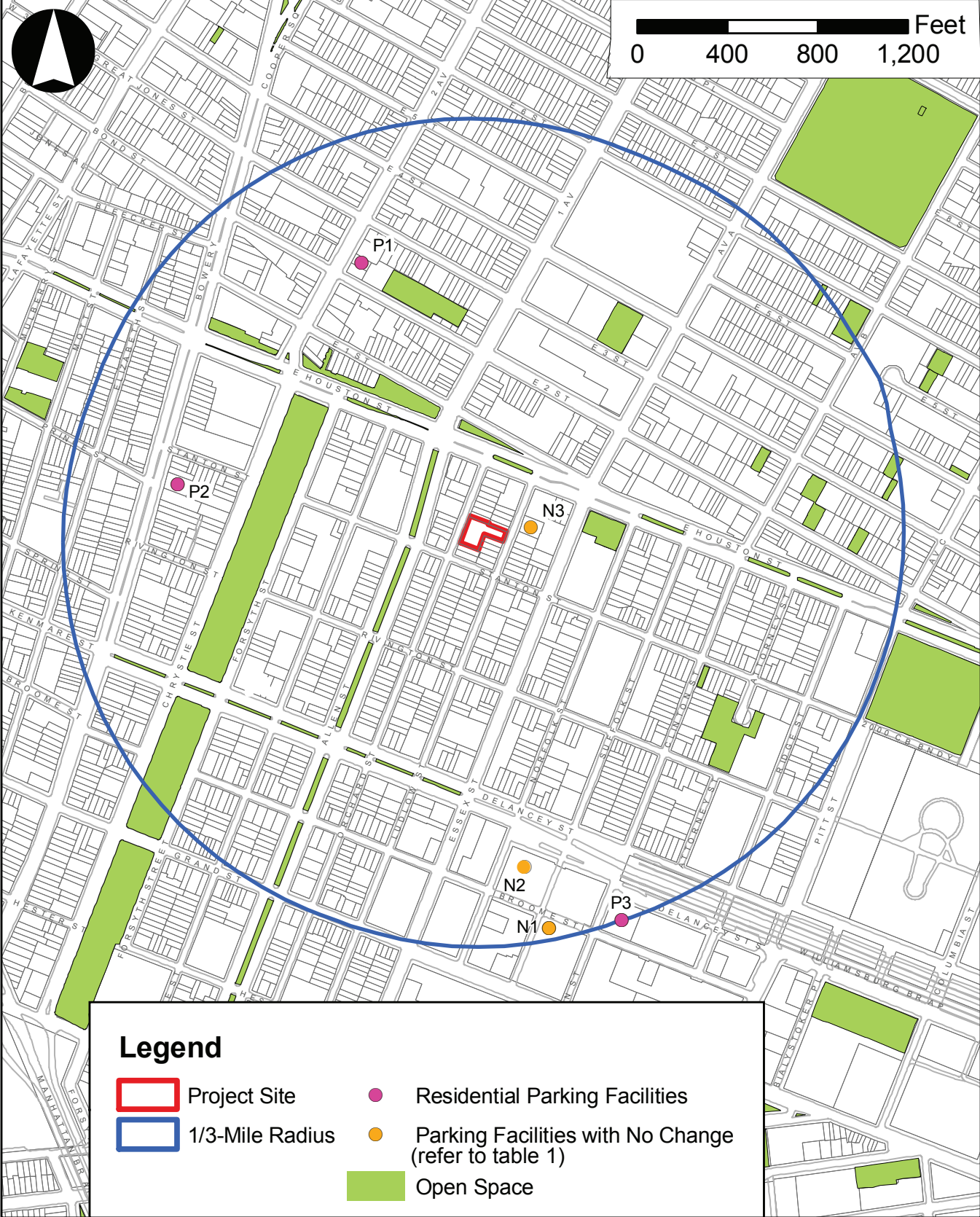
### *Residential Parking Change Analysis*

The Residential Parking Change Analysis indicates that during the study period the study area saw a decrease of 133 DCA-licensed off-street parking spaces, of which 89 spaces are estimated to have been residential parking spaces (per the Guidelines). This reflects both the elimination of 2 off-street public parking facilities, as well as the increase in capacity of one facility (refer to Table 1).

### *Residential Unit Change Analysis*

According to the Guidelines, the target percentage (ratio) of parking spaces to residential units is the same as the as-of-right parking maximums in the Manhattan Core: 20 percent of units for Community Districts 1 through 6 (the development site is in Community District 3). As shown in Table 2, approximately 1,993 net residential units were created in the study area during the study period. Applying this 20 percent target rate to the 1,993 new residential units identifies a target number of 406 new residential parking spaces. Table 2 also indicates that 6 of the new 47 developments in the study area during the study period contain off-street parking facilities, for a total net increase of 44 off-street residential parking spaces. With 89 residential spaces removed due to the elimination of DCA-licensed facilities during the study period, the net change in residential off-street parking capacity is a shortfall of 45 parking spaces.





**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	1004440000	103	42-45	2 AVENUE	1,180.49	98	67%	66	0	0	0	-98			
P2	1004260010	103	235	BOWERY	1,221.47	38	67%	25	0	0	0	-38			
P3	1003470070	103	118	CLINTON STREET	1,665.46	45	67%	30	48	67%	32	3			Modification/Renewed License
N1*	1006950065	103	44	SUFFOLK STREET	1,932.10	100	67%	67	100	67%	67	0			
N2*	1006920030	103	135	DELANCEY STREET	1,195.00	294	67%	197	294	67%	197	0			Dataset says this garage is inactive; Field Survey on 1/14 confirms facility is still active.
N3*	1006957506	103	184	LUDLOW STREET	309.24	184	67%	275	184	67%	275	0			
<b>Totals</b>						<b>759</b>		<b>660</b>	<b>626</b>		<b>571</b>	<b>-133</b>			

**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

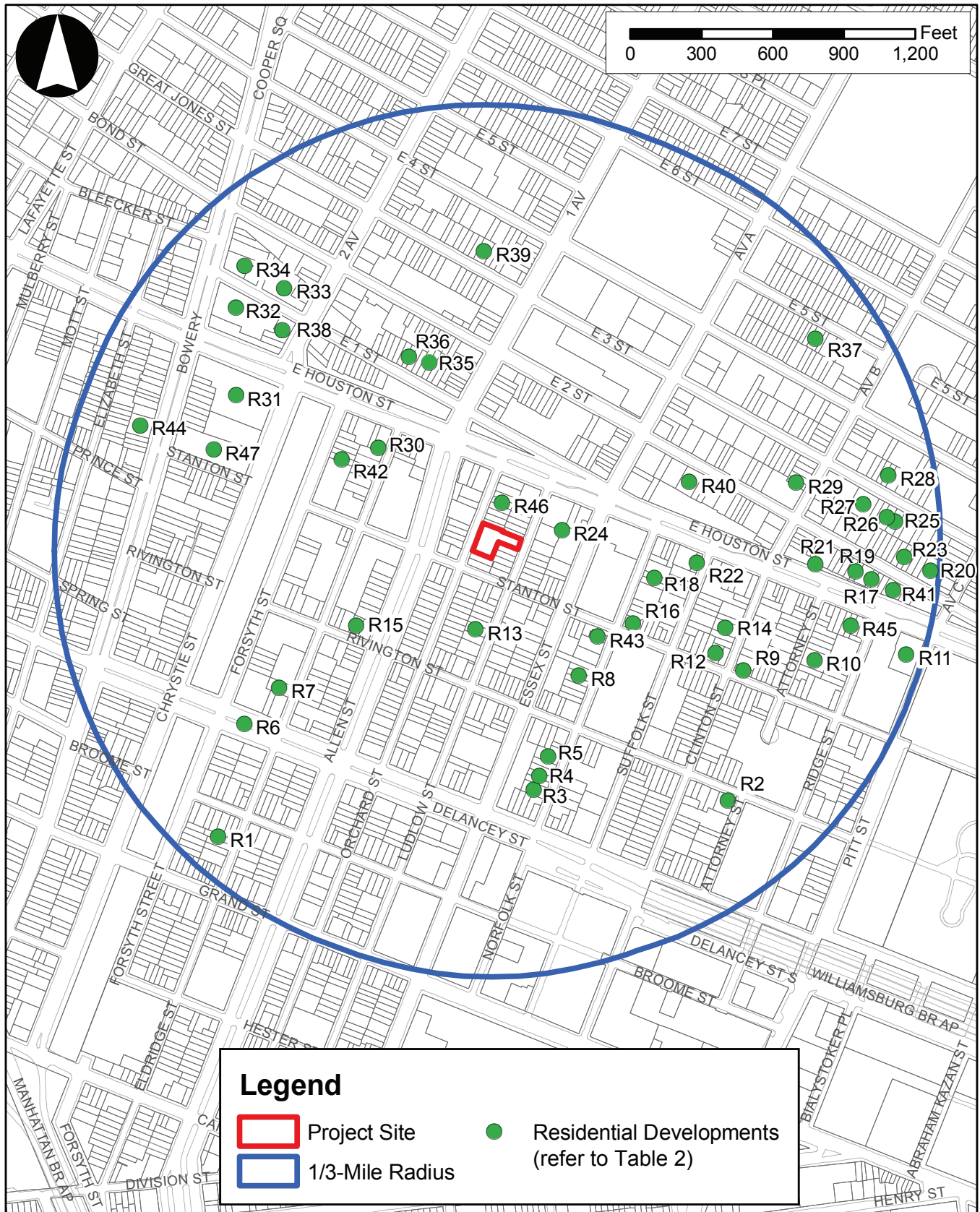
**Cross Reference Table 2 Map ID** is the Map ID of the site if it is located in Table 2

**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

\* Existing facilities with no change during lookback period.



**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	Building Status & Year	Association (# of spaces)	Notes	
R1	1004187500	103	113	ELDRIDGE STREET	1,577.06	0	12	12	2	0	2		2003	2		
R2	1003480060	103	179	RIVINGTON STREET	1,380.85	0	6	6	1	0	1		2004		Dataset: 5 DUs; CoFo: 6 DUs	
R3	1003537500	103	103	NORFOLK STREET	935.74	0	29	29	6	0	6		2007	6	Dataset: 30 DUs; CoFo: 29 DUs	
R4	1003537500	103	109	NORFOLK STREET	890.68	0	30	30	6	0	6		2012	6		
R5	1003537500	103	115	NORFOLK STREET	794.37	0	5	5	1	12	-11		2010		CoFo- has no parking listed, further research has shown 12 spaces	
R6	1004207500	103	38	DELANCY STREET	1,264.84	30	54	24	11	34	-23		2010		Dataset has 36-44 Delancy St. & 138-144 Forsyth Street for address; CoFo had 54 Dus, Dataset had 24 Dus, No special permit found on LUCATS	
R7	1004200070	103	167	ELDRIDGE STREET	966.03	0	18	18	4	0	4		UC	4	Dataset has 40 Delancy St. for address; CoFo has 38 Delancey St.	
R8	1003540030	103	141	NORFOLK STREET	556.35	0	18	18	4	0	4		2004	4		
R9	1003507500	103	172	STANTON STREET	1035.73	0	4	4	1	0	1		2013	1	Dataset: 5 DUs; CoFo: 4 DUs	
R10	1003457500	103	154-16	ATTORNEY STREET	1277.03	0	34	34	7	0	7		2010		Temporay CoFo	
R11	1003450060	103	133	PITT STREET	1636.13	0	248	248	50	0	50		2010			
R12	1003500030	103	164	STANTON STREET	928.22	0	17	17	3	0	3		2007	3		
R13	1004110030	103	145	LUDLOW ST	270.89	0	8	8	2	0	2		2015	2	Under Construction (2015)	
R14	1003500030	103	19	CLINTON STREET	888.82	0	24	24	5	0	5		2010	5		
R15	1004167500	103	62	RIVINGTON STREET	534.92	0	12	12	2	0	2		2006	2		
R16	1003550080	103	138	STANTON STREET	539.98	0	11	11	2	0	2		2003			
R17	1003847500	103	235	EAST 2 STREET	1,468.04	0	5	5	1	0	1		2002			
R18	1003550050	103	180	NORFOLK STREET	534.47	0	3	3	1	0	1		2004			
R19	1003847510	103	229	EAST 2 STREET	1,388.12	0	5	5	1	0	1		2010			
R20	1003857500	103	254	EAST 2 STREET	1,681.44	0	49	49	10	0	10		2009		Dataset: 47 DUs; CoFo: 49 DUs	
R21	1003847500	103	1	AVE B	1,107.60	0	22	22	4	0	4		2005		Dataset: 23 DUs; CoFo: 22 DUs	
R22	1003550060	103	179	SUFFOLK STREET	726.11	0	6	6	1	0	1		2014		Under Construction (Fall 2014)	
R23	1003850050	103	242	EAST 2 STREET	1,582.51	0	22	22	4	0	4		UC	4		
R24	1004120050	103	188	LUDLOW STREET	163.87	0	243	243	49	50	-1		2008		No special permit found on LUCATS	
R25	1003850020	103	234	EAST 3 STREET	1,540.15	0	19	19	4	0	4		2001		Dataset: 34 DUs; CoFo 19 DUs	
R26	1003850020	103	228	EAST 3 STREET	1,483.95	0	22	22	4	0	4		2003			
R27	1003850010	103	222	EAST 3 STREET	1,383.34	0	61	61	12	0	12		2002		Dataset 57; CoFo: 61 DUs	
R28	1003860060	103	227	EAST 3 STREET	1,582.12	0	22	22	4	0	4		2008	1		
R29	1003980030	103	26	AVENUE B	1,158.64	0	8	8	2	0	2		2013	2	Under Construction (Active Stop Work Order on Property); Was supposed to be complete by March 2013	
R30	1004220060	103	247	ELDRIDGE STREET	520.63	0	10	10	2	0	2		2003	2	Dataset: 11; CoFo: 10.	
R31	1004277504	103	229	CHRISTIE STREET	1,017.97	0										Sites R31, R32, R33, and R34 comprise a general large scale development, subject to a special permit allowing location of permitted accessory parking spaces without regard to zoning lot lines (C 010678ZSM). Number of built spaces represents net change from previously existing DCA facilities on development site. Previously existing DCA facility on Site R31 contained 149 spaces and previously existing DCA facility on Site R33 contained 106 spaces. Development currently contains 130 spaces on Site R32 and 50 spaces on Site R33.
R32	1004560107	103	1	EAST 1 STREET	1,191.56	0										
R33	1004570030	103	22	EAST 1 STREET	1,191.62	0	699	699	140	-75	215		2003			
R34	1004570000	103	2	EAST 1 STREET	1,448.85	0										
R35	1004437500	103	62	EAST 1 STREET	681.90	0	10	10	2	0	2		2011	2		
R36	1004430050	103	56	EAST 1 STREET	737.32	0	2	2	0	0	0		2002			
R37	1004000020	103	530	EAST 5 STREET	1,457.03	0	10	10	2	0	2		2009			
R38	1004560030	103	21	EAST 1 STREET	1,148.55	0	65	65	13	0	13		2012			
R39	1004450050	103	81	EAST 3 STREET	1,093.32	0	41	41	8	0	8		2003			
R40	1003970020	103	165	EAST 2 STREET	781.29	0	21	21	4	6	-2		2003		C of O States 6 off-street parking spaces; Site is an Assisted Living establishment for the elderly. No special permit found on LUCATS	
R41	1003840026	103	243	EAST 2 STREET	1,524.66	8	10	2	2	0	2		2013	2	Conversion/Expansion (was to be complete by Nov. 2013)	
R42	1004220042	103	204	FORSYTH STREET	634.23	0	11	11	2	2	0		UC		New building under construction, final site plan pending approval from DOB	
R43	1003540019	103	157	NORFOLK STREET	714.07	0	6	6	1	0	1		UC		Final site plan pending approval from DOB	
R44	1005070036	102	250	BOWERY	1,480.24	0	24	24	5	0	5		2012			
R45	1003450017	103	331	EAST HOUSTON STREET	1,593.53	0	78	78	16	2	14		UC			
R46	1004120012	103	194	ORCHARD STREET	173.57	0	5	5	1	0	1		2015	1	Under Construction (2015)	
R47	1003450017	103	215	CHRISTIE STREET	1,029.38	0	22	22	4	0	4		2016	4	Final site plan pending approval from DOB	
<b>Totals</b>						<b>38</b>	<b>2,031</b>	<b>1,993</b>	<b>406</b>	<b>31</b>	<b>375</b>			<b>53</b>		

**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 positive 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

**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

**UC** is a development under construction with no set build year.

### *Proposed Associates 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 3 identifies the proposed associated sites for the proposed special permit.

As shown in the table a, the Applicant has proposed 18 residential growth development sites to “associate” with; all 18 sites are located within a 1/3 mile radius of the development site and all are 18 new developments that do not provide any off-street parking spaces.

### **Previous Memo**

As mentioned above, a parking technical memorandum for the proposed garage was prepared by PHA in July 2013 (refer to Appendix A), which arrived at similar conclusions to the analysis described above. Both analyses:

- Reviewed available data<sup>1</sup> (GIS data and field visits conducted by PHA) for the same study area of a 1/3 mile radius from the development site to outline land use changes within this area over a look-back period (note that the July 2013 memorandum examined changes occurring between 2002-2013);
- Determined that the growth of residential parking spaces in new developments has outpaced the change in licensed off-street parking capacity; and
- Demonstrated that the existing number of off-street parking spaces is not sufficient to meet the current demand for parking within the study area.

### **Conclusions**

The proposed development would contain a parking garage with 99 spaces, 46 of which are permitted as-of-right as accessory to the hotel, retail and community facility uses in the building. The remaining 53 spaces are subject to the proposed special permit under ZR Section 13-451 for additional parking spaces for residential growth. As it is assumed that 100 percent of these additional spaces would be residential parking spaces per the Guidelines, the proposed project would result in a net increase of 53 off-street residential parking spaces. With this change, the study area would experience a net loss of 2 residential spaces over the study period. The parking ratios in Table 4 indicate that the study area has experienced a noticeable increase in residential units, and that the loss of public parking facilities and the minimal addition of new residential parking spaces is not adequate to meet the need for residential parking in the study area. The Residential Growth Parking Ratio in the study area under existing conditions is -2 percent. With the proposed 99-space parking facility, the study area would have a Residential Growth Parking Ratio of 0 percent, which is well below the target 20-percent ratio applicable in this part of the Manhattan Core, as shown in Table 4.

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<sup>1</sup> PLUTO, Version 02a. and Version 12v2, New York City Department of City Planning



Table 3, Proposed Associated Sites

Applicant / Project														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		
Name	Status: Active or Completed	Study Period	Street Number	Street Name	Community District	BBL	ULURP #	CPC Adoption Date	Parking Spaces Proposed	Residential Units Proposed	Permitted AOR Parking Spaces	Parking Spaces requested via Special Permit	Number of Sites Associated	Distance from Project Site to Association Site (ft)	Street Number	Street Name	Number of Spaces Applicant is Associating	10 Year Association End Date	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		
180 Orchard Street	Active	2003-14	180	Orchard Street	103	1-00412-0005	1003712SM	N/A	99	0	46	53	18	N/A	180	Orchard Street	53	2016	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Development will contain 295 hotel units and accessory spaces, with 46 AOR accessory parking spaces
														935.7	103	Norfolk Street	6	2016	2007	29	6	0	6	N/A	N/A	N/A	N/A	N/A	N/A	New Building
														890.7	109	Norfolk Street	6	2016	2012	5	6	0	6	N/A	N/A	N/A	N/A	N/A	N/A	New Building
														556.4	141	Norfolk Street	4	2016	2004	18	4	0	4	N/A	N/A	N/A	N/A	N/A	N/A	New Building- Only CoFOs from 2004
														1,035.7	172	Stanton Street	1	2016	2013	4	1	0	1	N/A	N/A	N/A	N/A	N/A	N/A	New Building- CoFO 1927 Storage/stores/tenement building, CoFO 2013- Temporary
														928.2	164	Stanton Street	3	2016	2007	17	3	0	3	N/A	N/A	N/A	N/A	N/A	N/A	New Building- CoFO 2007, No earlier CoFO listed
														270.9	145	Ludlow Street	2	2016	UC 2015	8	2	0	2	N/A	N/A	N/A	N/A	N/A	N/A	1936- Stores Only CoFO listed
														888.82	19	Clinton Street	5	2016	2010	24	5	0	5	N/A	N/A	N/A	N/A	N/A	N/A	New Building- CoFO 2013 temporary for alteration, CoFO 2009 Theater, Daycare, Apartments
														534.92	62	Rivington Street	2	2016	2006	12	2	0	2	N/A	N/A	N/A	N/A	N/A	N/A	New Building- 2006 Temp CoFO, 1927- Restaurant/Store/Office/Dwelling
														520.63	247	Eldridge Street	2	2016	2003	10	2	0	2	N/A	N/A	N/A	N/A	N/A	N/A	2003- 10 Dus, No Parking
														681.9	62	East 1st Street	2	2016	2011	10	2	0	2	N/A	N/A	N/A	N/A	N/A	N/A	New Building- CoFO 2011 10 Dus
														173.57	194	Orchard Street	1	2016	2015	5	1	0	1	N/A	N/A	N/A	N/A	N/A	N/A	1936- CoFO Storage
														1029.38	215	Chrystie Street	4	2016	2016	22	4	0	4	N/A	N/A	N/A	N/A	N/A	N/A	1988- CoFO 9 Dus no parking spaces
														966.03	167	Eldridge Street	4	2016	UC	18	4	0	4	N/A	N/A	N/A	N/A	N/A	N/A	New Building- CoFO 2014 Temporary
														1,577.06	113	Eldridge Street	2	2016	2003	12	2	0	2	N/A	N/A	N/A	N/A	N/A	N/A	New Buildings- CoFO 2003
														1,524.66	243	East 2 Street	2	2016	2013	8	2	0	2	N/A	N/A	N/A	N/A	N/A	N/A	New Building- Conversion/Expansion (was to be complete by Nov. 2013)
														1,582.51	242	East 2 Street	4	2016	UC	22	4	0	4	N/A	N/A	N/A	N/A	N/A	N/A	New Building- CoFO 2014 Temporary
														1,158.64	26	Avenue B	2	2016	UC - 2013	8	2	0	2	N/A	N/A	N/A	N/A	N/A	N/A	Under Construction (Active Stop Work Order on Property); Was supposed to be complete by March 2013
														1,582.12	227	East 3 Street	1	2016	2008	22	4	0	4	N/A	N/A	N/A	N/A	N/A	N/A	New Building- CoFO 2008

**Table 4a, Residential Growth Parking Ratio (Without Project)**

A) Res Change in Parking Spaces (from Table 1)	B) Res Growth in Parking Spaces (from Table 2)	Parking Ratio
-89	+ 44	= -2%
1,993		
C) Net Change in DU's (res growth) (from Table 2)		

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

10-Sep-14

Formula is:  $\frac{A + B}{C} = \text{Parking Ratio w/o Project}$

**Table 4b, 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(1)	Res Parking Spaces (@ 67% of total) Eliminated by Proposed Project (2)	Parking Ratio
-89	+ 44	+ 53	+ 0	= 0%
1,993		+ 0		
C) Net Change in DU's (res growth)		P2) Proposed No. of DU's		

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

10-Sep-14

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

(1) As-of-right parking capacity is 46, proposed garage would have 99 spaces, for an increment of 53 spaces.

(2) Proposed project would not eliminate any existing parking on development site, or add new residents.