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SPECIAL PERMIT FINDINGS NARRATIVE • 16 January 2015

Background and Summary of Findings:

This report summarizes the analysis of residential growth and off-street parking changes within the vicinity of 520 W. 28th Street (“development site”) pursuant to Sections 13-45 and 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 28th Highline Associates, LLC (“Applicant”), an affiliate of The Related Companies, LP, to the City Planning Commission (“CPC”) for a 29-space below-grade parking garage (“Proposed Project”) accessory to a new mixed use building with approximately 40 dwelling units (DUs) and approximately 11,213 gsf of retail at 520 W. 28th Street, Block 699, Lot 43.

The development site is an L-shaped through-lot with frontage on both W. 27th Street and W. 28th Street, located midblock between Tenth Avenue and Eleventh Avenue. The development site is located immediately west of the High Line public open space. The new building on the development site, in which the proposed garage would be located, is currently under construction on an as-of-right basis. The building is permitted to provide 8 residential accessory parking spaces as-of-right and therefore the proposed special permit would allow an incremental increase of 21 residential accessory parking spaces. (The retail component of the development, consisting of 11,183 zsf of retail space, would also generate three as-of-right commercial accessory parking spaces.) With or without the proposed special permit, the garage will be accessed via a curb cut located on W. 28th Street approximately 313 feet west of Tenth Avenue and 479 feet east of Eleventh Avenue.

The required analyses found that the 29 spaces proposed by the Applicant are reasonable and not excessive in relation to recent trends within close proximity to the proposed development site. There has been an increase of over 2,800 housing units (in both new construction and conversions) within the prescribed one-third mile study area (“Study Area”) surrounding the Site during the approximately 10-year lookback period (2004-2014) and extending until 2016 (the Proposed Project’s Build year), during which period there has been a decrease in more than 1,700 DCA-licensed spaces. Using the DCP methodology, the analysis found that although the growth of residential parking spaces in new developments has outpaced the net adjusted decrease in DCA-

licensed parking capacity during the study period, with the additional spaces within the proposed garage the ratio of change in residential parking spaces to change in residential units would be 4 percent and thus not exceed DCP's 20 percent target growth parking ratio for the Study Area.

The Applicant has identified proposed associated sites to offset the proposed increase in residential parking spaces over what is allowed on the site as-of-right.

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") Draft Guidelines version 2.9, dated April 28, 2014.

Study Area

The Study Area was defined as a one-third mile radius of the boundary of the proposed development site. This encompasses an area that extends as far north as the north side of W. 34th Street, as far east as the west side of the Eighth Avenue corridor, as far south as the south side of W. 21st Street, and as far west as the Hudson River. The study area is located entirely within Manhattan Community District 4 and encompasses portions of the West Chelsea, Chelsea, and Hudson Yards neighborhoods. Refer to Figure 1.

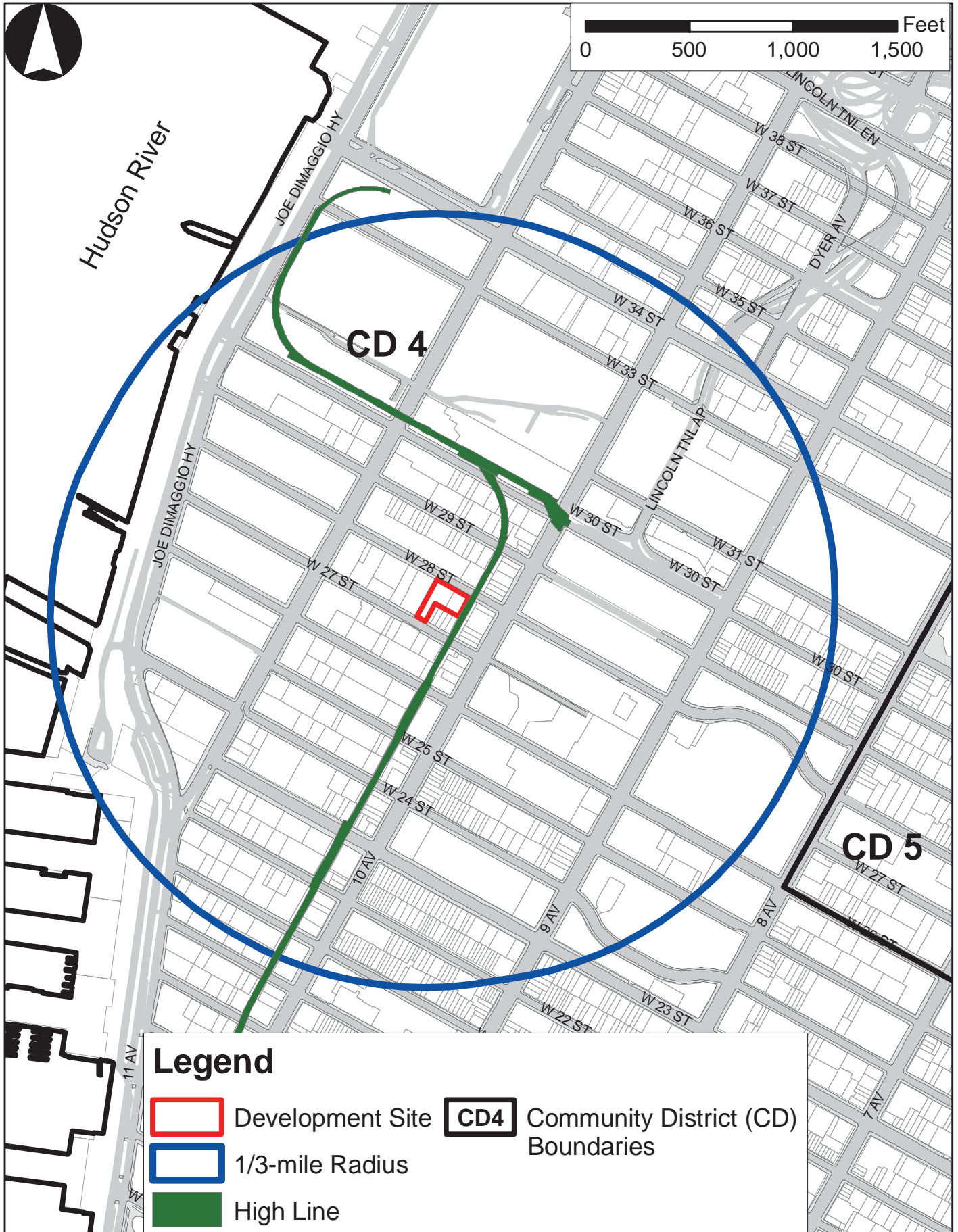
Study Period

Per the Guidelines, the study period was defined as starting at an approximately 10-year "look-back" prior to the application filing, i.e., 2014, and ending at the projected conditions during the anticipated completion year for the proposed development, which is 2016.

Data Collection

DCP provided the Applicant with 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 and conversions since the start of the study period. These data 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.¹

¹ As a result of field visits and document reviews, some sites were added or removed from the datasets provided from DCA and DOB. In summary: 1) one parking change site in the DCA data was corrected (the lookback vs. current spaces were reversed); 2) five parking change sites not in the DCA data were added; 3) three parking change sites in the DCA data were removed; 4) four residential growth sites not in the DOB data were added; 5) one residential growth site in the DOB data was removed; and 6) for several residential growth sites in the DOB dataset, minor corrections were made to the dwelling unit count.



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 2009.² The percentage for Community District 4 is 30 percent. Thus, the Residential Parking Change Analysis indicates a net decrease of 1,730 DCA-licensed total off-street parking spaces, of which 521 spaces are considered residential spaces (per the Guidelines) in the study area during the study period. This reflects the elimination of 16 public parking facilities. There are no known instances of non-DCA residential accessory parking spaces being eliminated in the Study Area during the study period. Refer to Table 1 and Figure 2.

It should be noted that five of the 16 eliminated facilities were replaced by new residential or mixed residential-commercial developments that include new DCA-licensed parking garages. Per the Guidelines, these new facilities are accounted for in the Residential Unit Change Analysis discussed below.

Residential Unit Change Analysis

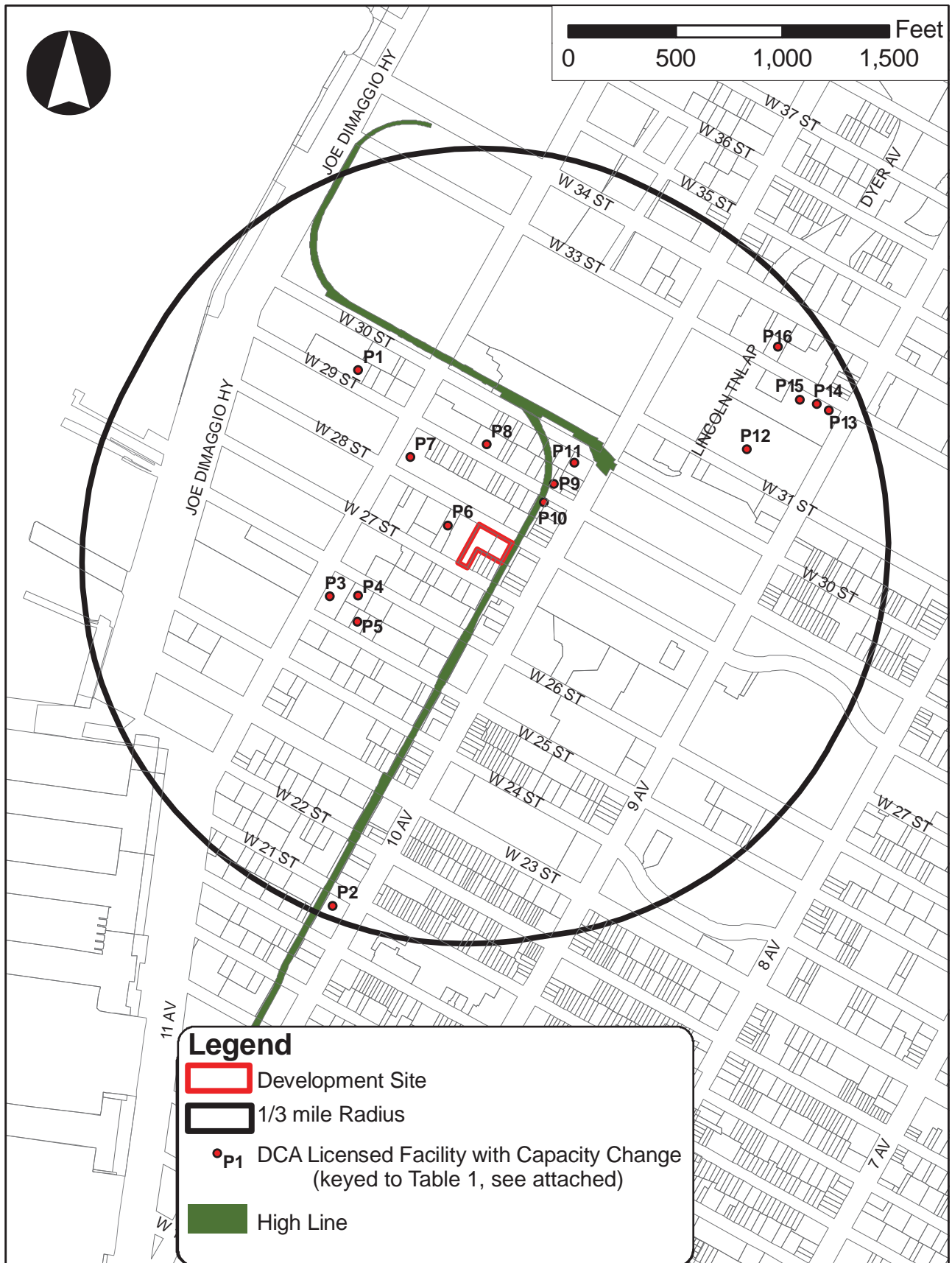
New Residential Units

The Residential Unit Change Analysis indicates a net increase of 2,890 residential units in new residential and mixed residential-commercial developments in the Study Area during the study period. This includes 24 residential growth sites; one development is an existing residential development that added one unit to six existing units while the other 23 sites did not have any units at the start of the study period. These 23 new residential development sites included 21 new construction buildings, with a total of 2,772 units and 596 parking spaces, and two conversions or conversions/expansions, with a total of 117 units and zero parking spaces. Of the 24 sites with new residential units, as of fall 2014, 18 are completed and occupied and six are not yet completed but are expected to be completed and occupied by 2016. 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 this 20 percent target rate to the 2,890 new (incremental) residential units identifies a target number of 578 new (incremental) residential parking spaces (as there are 6 existing DUs that remained on one site, the total target number is identified in Table 2 as 579 spaces).

² As noted in the Guidelines, an applicant may present data to justify a different percentage of residential parking; however the applicant is not proposing to do so for this study.



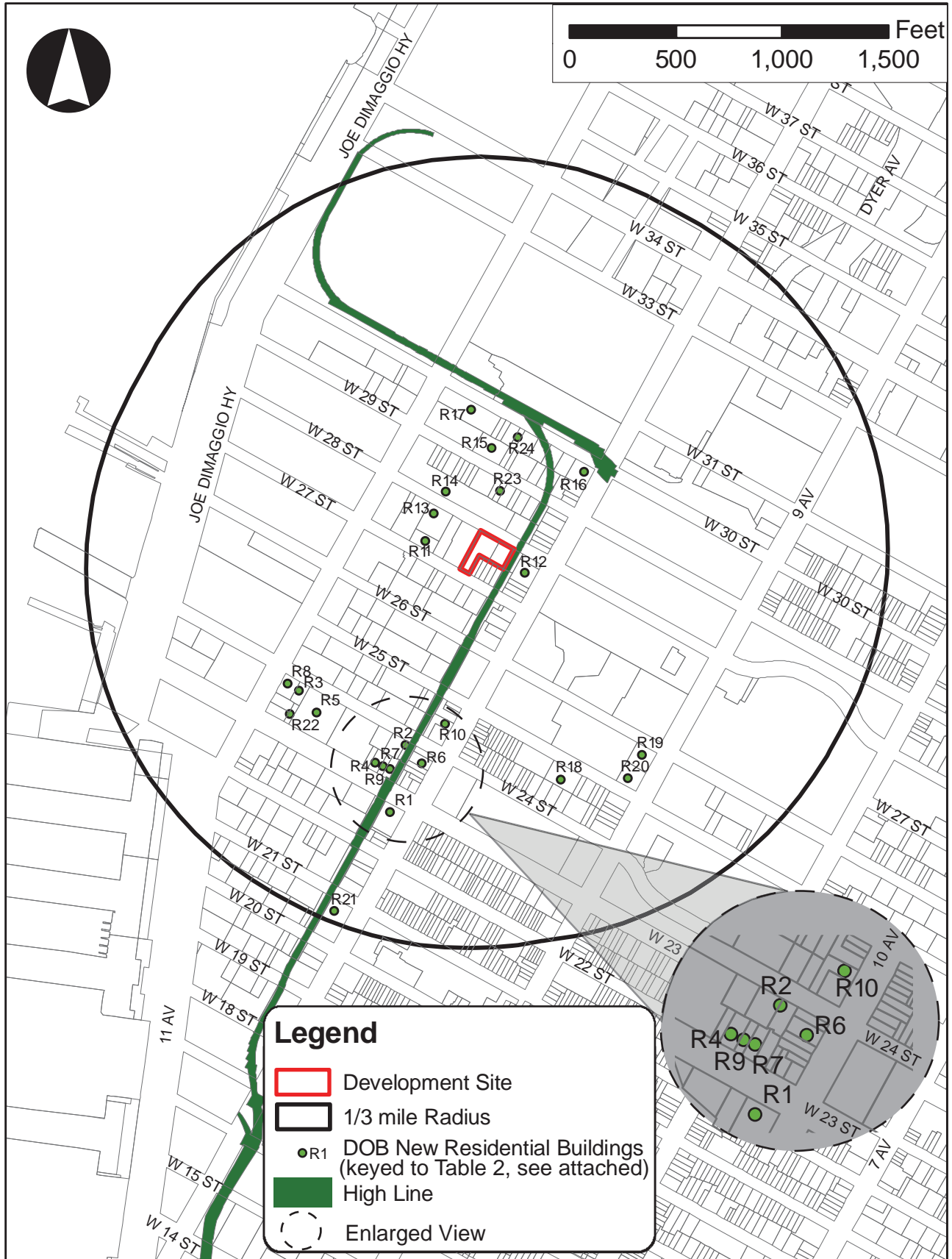


Table 1 - 520 W. 28th St. Residential Parking Change

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	Notes
P1	1-00675-0010	104	613	WEST 29 STREET	1,177	46	30%	14	0	30%	0	-14		
P2	1-00692-0030	104	500	WEST 21 STREET	1,892	142	30%	43	0	100%	0	-43	R21	
P3	1-00697-0001	104	220	11 AVENUE	905	150	30%	45	0	30%	0	-45		
P4	1-00697-0060	104	560	WEST 26 STREET	728	48	30%	14	0	30%	0	-14		
P5	1-00697-7501	104	545	WEST 25 STREET	762	162	30%	49	0	30%	0	-49		
P6	1-00699-0014	104	534	WEST 28 STREET	284	144	30%	43	0	30%	0	-43		
P7	1-00700-0001	104	282	11 AVENUE	578	134	30%	40	0	30%	0	-40		
P8	1-00701-0020	104	529-539	WEST 29 STREET	461	100	30%	30	0	100%	0	-30	R15	Now part of Lot 16
P9	1-00701-0030	104	505	WEST 29 STREET	335	130	30%	39	0	100%	0	-39	R16	Now part of Lot 42
P10	1-00701-0040	104	506-530	WEST 30 STREET	453	113	30%	34	0	100%	0	-34	R26	Now part of Lot 16
P11	1-00701-0042	104	343	10 AVENUE	431	50	30%	15	0	100%	0	-15	R16	Now part of Lot 42
P12	1-00729-0050	104	425	WEST 31 STREET	1,185	145	30%	44	0	30%	0	-44		UC (Manhattan West)
P13	1-00729-0060	104	401-409	9 AVENUE	1,421	115	30%	35	0	30%	0	-35		UC (Manhattan West)
P14	1-00729-0060	104	412-422	WEST 33 STREET	1,676	92	30%	28	0	30%	0	-28		UC (Manhattan West)
P15	1-00729-0060	104	440	WEST 33 STREET	1,372	82	30%	25	0	30%	0	-25		UC (Manhattan West)
P16	1-00731-0020	104	431-435	WEST 33 STREET	1,518	77	30%	23	0	30%	0	-23		
Totals						1,730		521	0		0	-521		

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 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 difference between number of residential currently and the number of residential spaces in the lookback baseline

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

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 - 520 W. 28th St. 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	Notes	
R1	1-00694-0040	104	500	W 23 ST	1,425	0	111	111	22	0	-22			built 2013	Dataset: 109 DU's	
R2	1-00695-0040	104	508	W 24 ST	1,108	0	15	15	3	0	-3			UC	2014 occupancy expected	
R3	1-00695-0065	104	552-560	W 24 ST	1,223	0	8	8	2	0	-2			UC	2015 occupancy expected; aka 560 W 24 St	
R4	1-00695-7502	104	521-23	W 23 ST	1,212	6	7	1	1	0	-1			New DU 2004	Dataset: 2004 6 new DU's	
R5	1-00695-7503	104	549-55	W 23 ST	1,340	0	336	336	67	70	3		0989662	built 2013	Dataset: 337 DU's; was Lot 7	
R6	1-00695-7504	104	231-33	10 AV	1,069	0	22	22	4	0	-4			built 2011	Dataset: 16 DU's	
R7	1-00695-7505	104	519	W 23 ST	1,208	0	11	11	2	0	-2			built 2010		
R8	1-00695-7506	104	200	11 AV	1,224	0	15	15	3	15	12			built 2011	Dataset: 12 DU's; non-DCA per SP;	
R9	1-00695-7507	104	515	W 23 ST	1,210	0	11	11	2	0	-2			built 2013		
R10	1-00696-7502	104	245	10 AV	895	0	18	18	4	0	-4			built 2014	Dataset: 14 DU's	
R11	1-00699-0009	104	537	W 27 ST	416	0	28	28	6	0	-6			built 2012		
R12	1-00699-0033	104	303	10 AV	149	0	89	89	18	0	-18			built 2012	Associated Site	
R13	1-00699-7502	104	540	W 28 ST	351	0	90	90	18	0	-18			built 2012		
R14	1-00700-0009	104	525	W 28 ST	246	0	710	710	142	147	5			built 2014	Dataset: 206 DU's; 2 buildings (298 11 Av)	
R15	1-00701-0016	104	529	W 29 ST	461	0	139	139	28	28	0	P8		built 2014	Dataset: 126 DU's; only p/o tax lot	
R16	1-00701-0042	104	500	W 30 ST	443	0	391	391	78	79	1	P9, P11		built 2014	2014 occupancy; Dataset: 389 DU's	
R17	1-00701-0062	104	314-316	11 AV	677	0	369	369	74	181	107			built 2010	2 garages, 103 & 78	
R18	1-00722-0051	104	418-426	W 25 ST	1,137	0	67	67	13	0	-13			built/conv 2012		
R19	1-00723-7501	104	263	9 AV	1,179	0	50	50	10	0	-10			converted 2006		
R20	1-00723-7502	104	401	W 25 ST	1,213	0	168	168	34	26	-8			built 2012		
R21	1-00692-0030	104	500	W 21 ST	1,892	0	32	32	6	9	3	P2		UC	2015 or '16 occupancy	
R22	1-00695-0006	104	559	W 23 ST	1,321	0	8	8	2	0	-2			UC	2015 occupancy	
R23	1-00700-0047	104	522	W 29 ST	259	0	27	27	5	5	0			UC	2015 or '16 occupancy	
R24	1-00701-0016	104	520-532	W 30 ST	551	0	174	174	35	36	1	P10		UC	2016 occupancy; only p/o tax lot	
Totals						6	2,896	2,890	579	596	17					

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 a 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

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, 10 of the 24 residential developments have included or will include off-street parking facilities. Collectively these new developments have a licensed capacity of 596 off-street residential parking spaces, of which all are in new construction buildings. With the 596 new residential parking spaces created in the residential developments and 521 residential spaces removed due to the elimination of DCA-licensed facilities, the Guidelines methodology finds that the net adjusted change in residential off-street parking capacity is an increase of 75 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, as outlined below.

Proposed Project: Residential Parking Change

The proposed garage special permit would allow 29 parking spaces on the Site. As it is assumed that 100 percent of these spaces would be residential parking spaces per the Guidelines, with this change added to the net increase of 75 residential parking spaces in the Study Area without the project, the Study Area would experience a net increase of 104 spaces. (As noted above, the new building on the development site is permitted to provide approximately 8 residential accessory parking spaces as-of-right; these 8 spaces are not included in the net change of 75 spaces identified for conditions without the project.)

Proposed Project: Residential Unit Change

The new as-of-right building on the development site will have 40 residential units. With this new building added to the 2,890-unit net increase occurring without the project, the Study Area would experience a net increase of 2,930 residential units. As a result, the Study Area will have a target number of 586 new residential parking spaces, which represents the total number of residential parking spaces that could be added before the Study Area target of 20 percent is reached.

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 3 percent. This reflects a net increase of 75 residential parking spaces and a net increase of 2,890 residential units. As also shown in Table 3, under “With Project” conditions, the Study Area Residential Growth Parking Ratio will be 4 percent. This reflects an overall net increase of 104 residential parking spaces and a net increase of 2,930 residential units. In order for the Study Area to reach the target (20 percent ratio) 586 spaces of parking, the Study Area would need to add an additional 482 residential parking spaces.

520 W. 28th St.

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

A) Res Change in Parking Spaces (from Table 1)	-521	+	B) Res Growth in Parking Spaces (from Table 2)	596	=	Parking Ratio	3%
	2,890						
C) Net Change in DU's (res growth) (from Table 2)							

16-Jan-15

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

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

A) Res Change in Parking Spaces (from Table 1)	-521	+	B) Res Growth in Parking Spaces (from Table 2)	596	+	P1) Proposed No. of Parking Spaces	29	+	Res Parking Spaces (@ 24% of total) Eliminated by Proposed Project	0	=	Parking Ratio	4%
	2,890					P2) Proposed No. of DU's	40						
C) Net Change in DU's (res growth)													

16-Jan-15

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

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

Pending Applications

It should be noted that there are currently three pending garage special permit applications in the study area. These include: (1) a new 44-unit development at 551 W. 21st Street, projected to be completed by 2016, pursuing a special permit to allow a 53-space garage; (2) a new 36-unit development at 525 W. 27th Street, assumed to be completed by 2016, pursuing a special permit to allow a 39-space garage, and (3) an existing approximately 255-space parking garage at 340 W. 31st Street, known as the “Post Office Garage,” that is seeking a new special permit to continue existing operations. These sites have not been accounted for in Tables 1 and 2.

If the special permits are granted for 551 W. 21st Street and 525 W. 27th Street and these developments are completed by 2016, then there would be 80 additional residential units and 92 additional residential parking spaces. As a result, with these pending sites included, the Residential Growth Parking Ratio without the project would be 6 percent instead of 3 percent and Residential Growth Parking Ratio with the project would be 7 percent instead of 4 percent.

The pending application for a new special permit for 340 W. 31st Street garage, if approved, is expected to either maintain the existing number of spaces or result in a reduction; in any event it is not expected to increase the parking capacity and therefore its effect on the study area residential growth parking ratio, if any, would be a minor reduction in the ratio.

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 4 summarizes the proposed associated sites for the proposed special permit and Table 5 presents detailed information.

Table 4, Proposed Associated Sites

Site	Table 2 Map ID No.	Distance from Project Site	Number of Spaces
Proposed Development Spaces Permitted As-of-right ¹	N/A	0	8
303 10 Av New Residential Development Site “Unbuilt” Spaces	R12	149	18
534 W 28 St Residential Spaces Removed	P6	284	3*
TOTAL			29

* Note: only associating with 3 of the 43 residential spaces removed from this site.

¹ As-of-right spaces calculated as follows a) 40 residential units, @ 0.2 spaces/unit, 8 spaces; b) ±11,183 zsf of retail, @ 1 space/4,000 sf, 3 spaces (note: no association made with retail spaces).

As shown in Tables 4 and 5, in addition to its spaces permitted as-of-right, the Applicant has proposed one residential growth development site and one residential parking change site to “associate” with; both sites are located on the same block (Block 699) as the development site.

Table 5. Detailed Information on 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				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	Community District	BBL	Number of Spaces Applicant is Associating	10 Year Association End Date	Year Built	Number of Residential Units	Number of 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 Capacity for Lookback Period	DCA Capacity	DCA Residential Parking Capacity	Expected Loss In Residential Capacity	Notes		
520 W 28 St	Active	2004-2016	520	W 28 St	104	1-00699-0043		N/A	41	40	8	41	3	N/A	520	WEST 28 STREET	104	1-00699-0043	8	2016	2016	40	8	0	8	8	N/A	N/A	0	0	0		
			303	10 AV	104	1-00699-0033								149.0					18	2016	2012	89	18	0	18	N/A	N/A	N/A	N/A	N/A	N/A		
			534	WEST 28 STREET	104	1-00699-0014								284.0					3	2016	N/A	N/A	N/A	N/A	N/A	144	43	N/A	N/A	N/A	N/A		