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MEMORANDUM

TO: Karolina Hall, Ezra Moser

FROM: John Strauss

RE: 530 West 28th Street – Residential Growth and Off-Street Parking Study

DATE: May 8, 2015

cc: N. Hockens, A. Curreri, I. Rasmussen, Stephen Johnson, Karen Johnson

This memorandum summarizes the analysis of residential growth and off-street parking changes in support of a parking Special Permit pursuant to ZR Sections 13-45 and 13-451 for the proposed mixed-use residential and commercial development at 530 West 28th Street in Manhattan. The applicant is proposing to increase the number of permitted enclosed, residential accessory off-street parking spaces in the subject building from seven (7) (as-of-right parking spaces) to thirty-six (36). The subject building will also include three (3) as-of-right commercial accessory off-street parking spaces for a total number of thirty-nine accessory parking spaces.

Methodology

In order to address the findings related to Section 13-451(a), this analysis first identifies the required project study area of approximately one-third (1/3) of a mile (1,760 feet) from the edge of the project zoning lot. Within this study area, the analysis considers and analyzes sites where the net number of residential units and residential parking spaces has changed over approximately the past ten years prior to the application filing (2003 to 2013). This information is presented in separate maps and tables as further discussed below illustrating, on a site by site basis, the number of new residential units constructed and changes to the number of parking spaces within the study area occurring between 2003 and 2013. The analysis also presents expected changes through the build year (2015) of the proposed development.

Based on the findings of the above, the analysis calculates the residential growth parking ratio by taking the net change in the number of parking spaces and dividing by the net change in the number of residential units during the study period. This number is then compared to the target percentage/as-of-right parking maximum in the Manhattan Core of 20 percent of the residential units for Community District 4 in which the project site is located. The analysis also includes a table identifying several nearby residential growth sites to associate with each parking space created as a result of the parking special permit in order to ensure that the same sites are not used again for future residential growth special permits.

Residential Unit Change

Map #1 - New Residential Units 2003-2013 - This map locates the proposed development site and identifies 23 parcels where new residential units have been constructed between 2003 and 2013 within the project study area of 1,800 feet (1/3 of a mile). The map differentiates between sites where new residential development replaced an existing parking facility, sites where new residential development includes a parking facility, and sites where new residential development replaced an existing parking facility and includes a parking facility. A total of 2,599 new residential units were developed between 2003 and 2013 within 1,800 feet of the project site.

Table #1 - New and Expected Future Residential Developments (2003-2013) - This table lists the 23 parcels shown on Map #1 of New Residential Developments (2003-2013) where new residential units have been constructed between 2003 and 2013 within 1,800 feet of the project site. As shown in Table #1, we found that for the 2,599 new residential units developed between 2003 and 2013 within 1,800 feet of the project site, 518 parking spaces were allowed as-of-right, 479 parking spaces were built. The number of parking spaces permitted as-of-right that were not built ("Unbuilt Spaces") was 147.

A review was conducted of the Certificates of Occupancy (COs) for the residential growth sites indicated in DCP's data to confirm the number of residential units and determine whether the CO was issued within the 2003-2013 study time period. This review found that of the 23 sites that have a CO, there were 12 discrepancies between the DCP data and what is shown on the COs (and an additional project under construction that was not indicated in the data provided). The errors range from a one unit discrepancy, to discrepancies in the triple digits. (The COs can be provided on request.) The data table shows the number of units per the most recent CO for each property.

Change in Residential Parking

Map #2 - Change in Parking Spaces 2003-2013 - This map locates the proposed development site and identifies 15 parcels where there has been an increase or a decrease in the number of parking spaces between 2003 and 2013 within the project study area of 1,800 feet. As discussed below, with the exception of one site (the former NYCHA property at 401 West 25th Street), all of these parcels have DCA-licensed parking facilities. A net total of 719 parking spaces were lost between 2003 and 2013 within the project study area.

Note that a field survey was conducted of the project study area to verify whether the DCA-licensed parking facilities identified by DCP exist. The survey found that these facilities do in fact exist and no additional DCA-licensed parking facilities exist within the project study area.

The field survey was also conducted to identify parking sites in the study area that are not licensed by DCA. The survey found no non-DCA-licensed parking facilities within the project study area. Therefore, the facilities identified by DCP are a complete list.

4. Table #2 - Residential Parking Change (2003-2013) - This table lists the 15 parcels shown on Map #2 Change in Parking Spaces 2003-2013 where there has been an increase or a decrease in the number of parking spaces between 2003 and 2013 within the project study area. As shown in Table #2, we found that 1,267 parking spaces existed in 2003 while 548 parking spaces currently exist, resulting in a net loss of 719 parking spaces between 2003 and 2013 within 1,800 feet of the project site. Using the percentage of 30% for local residential parking, outlined in the Manhattan Core Parking Study based on all land uses in Community District 4, this equates to loss of approximately 380.1 parking spaces that were formerly used by local residential parkers; along with 414.3 parking spaces currently used by local residential parkers; which equates to a net increase of 34.2 parking spaces used by local residential parkers from 2003 to 2013.

5. Appendix - The Appendix includes a list of new residential units created between 2003 and 2013 where discrepancies were found between DCP data and DOB CO records based on our research. Some general descriptive information about these facilities is included as well as the results of our review of CO data as to whether there was any recorded change in these facilities between 2003 and 2013.

Analysis Findings

The analysis indicates that there has been a net decrease of 719 in the number of parking spaces in the study area. This total is comprised of the difference between the number of parking spaces existing in 2003 (1,267 parking spaces) and the number of spaces existing in 2013 (548 parking spaces).

Parking spaces lost are estimated to have been utilized by residential parkers at a rate of 30%; thus a decrease in residential parking spaces of 380.1. Parking spaces that have been created are estimated to be utilized by residential parkers at 100% where accessory to residential buildings (accessory parking), and at 30% where not accessory to residential buildings (public parking); thus an increase in residential parking spaces of 414.3 parking spaces. This equates to a net increase of approximately 34.2 residential parking spaces.

Additionally, there were 147 Unbuilt Spaces, defined as the number of parking spaces permitted as-of-right that were not built, for the 2,599 new residential units developed within 1,800 feet of the project site during this same period.

Residential Growth Parking Ratio

The Residential Growth Parking Ratio for the 2003-2013 period, calculated without the parking spaces and residential units associated with the proposed project, is the change in the number of parking spaces used by local residential parkers (34.2 spaces), divided by the change in the number of residential units (2,599). Thus, without the project, the Residential Growth Parking Ratio is 1.31%. To calculate the Residential Growth Parking Ratio for the same time period, accounting for the parking spaces and residential units associated with the proposed project, the number of proposed accessory residential spaces (36) is added to the change in the number of spaces from 2003 to 2013, producing a numerator of 70.2, and the number of proposed

residential units (36) is added to the change in the number of residential units from 2003 to 2013, producing a denominator of 2,635. With the project, therefore, the Residential Growth Parking Ratio would be 2.66%. 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 for Community District 4 which is 20 percent of residential units.

The Residential Growth Parking Ratio without the project is 1.31%.

The Residential Growth Parking Ratio with the project is 2.66%.

It should be noted that there are two projects in the project area that are seeking Manhattan Core parking special permits pursuant to ZR Section 13-451:

- 520 West 28th Street - a 188,691 gsf mixed-use building which is expected to include 40 residential dwelling units within 137,769 gsf of floor area, 11,213 gsf of retail space, and 29 accessory parking spaces.¹ This building is projected to be completed in 2016.
- 551 West 21st Street - a 21-story mixed-use building which is expected to contain 44 dwelling units within 152,659 square feet of floor area, 10,610 square feet of commercial floor area, and 53 accessory parking spaces.² This building is projected to be completed in 2015.

The first building will have 40 units and 9 parking spaces, and the second will have 44 units and 9 parking spaces; neither building is accounted for in the Maps or Tables. If both special permits are granted, there will be an additional 84 residential units and 18 off-street parking spaces within the study area of 530 West 28th Street. As a result of adding this development to the analysis, the Residential Growth Parking Ratio would be 3.24%.

Proposed Associated Sites

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 parking special permit. The process of selecting associated sites begins with the sites closest to the proposed development site. Table 3 summarizes the proposed associated sites for the proposed development.

¹ DCP Land Use Application No. C150147ZSM and CEQR Negative Declaration (15DCP039M) dated 02/17/15, DCP updated information provided 03/10/15.

² DOB Job No: 121327331 dated 1/10/2013 identifies 22-story building. PAA's reduce height to 21 stories, DCP information provided 03/10/15.

Conclusion

To summarize the above findings, the analysis indicates that there has been a net decrease of 719 parking spaces, and an increase of 2,599 new residential units within 1,800 feet of the project site for the period from 2003 to 2013; this equates to a net increase of approximately 34.2 parking spaces used by residential parkers. In addition, there were 147 “Unbuilt Spaces” that could have been developed as-of-right but were not provided. Without the project, the Residential Growth Parking Ratio is 1.31%, and with the project the Ratio is only slightly more at 2.66%; both are within the target ratio of 20% for this Community District.

On the basis of the above analysis, the provision of 36 residential accessory parking spaces plus 3 accessory commercial parking spaces in the proposed development is reasonable and not excessive in relation to recent trends in close proximity to the proposed facility with regard to the increase in the number of dwelling units and the number of public and accessory off-street parking spaces, taking into account both the construction of new off-street parking facilities and the reduction in the number of such spaces in existing parking facilities. With the proposed project there would be a slight increase in the ratio of the amount of parking provided relative to the number of new residential dwelling units constructed within the project study area.

Additionally, the methodology employed in the analysis errs on the side of assuming the maximum utilization of new parking spaces by residential parkers. That is, by assuming that 100% of parking spaces in new parking facilities located within residential buildings will be used by area residents and not including visitors to the area, the methodology accounts, to the fullest extent possible, for a possible increase in residential parking in the area. This, therefore, provides even greater support for our conclusion that the number of parking spaces in the proposed facility is not excessive.

Legend

-  # of New Residential Units Site ID #
-  New Residential Development Replacing Parking Facility
-  New Residential Development Including New Parking Facility
-  New Residential Development Replacing Parking Facility and Including New Parking Facility
-  1,800 Foot Radius (slightly more than 1/3 of a mile)
-  530 West 28th Street (Site)

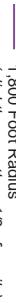


Site	Address	Residential Units
1	360 WEST 28th STREET	17
2	401 WEST 25th STREET	168
3	263 NINTH AVENUE	50
4	418-426 WEST 25th STREET	67
5	426 WEST 25th STREET	---
6	314 ELEVENTH AVENUE	369
7	500 WEST 30th STREET	256
8	529 WEST 29th STREET	139
9	525 WEST 28th STREET	710
10	540 WEST 28th STREET	91
11	303 TENTH AVENUE	89
12	537 WEST 27th STREET	28
13	245 TENTH AVENUE	18
14	515 WEST 23rd STREET	42
15	200 ELEVENTH AVENUE	15
16	519 WEST 23rd STREET	11
17	231-23 TENTH AVENUE	22
18	549 WEST 23rd STREET	336
19	521 WEST 23rd STREET	8
20	552 WEST 24th STREET	6
21	508 WEST 24th STREET	14
22	500 WEST 23rd STREET	111
23	169 10th AVENUE	32
TOTAL		2,599

(Site #5 is a duplicate entry.)



Legend

-  123
1
Change in DCA-licensed
Parking Spaces 2003-2013
-  Site ID #
-  1,800 Foot Radius
(slightly more than 1/3 of a mile)
-  530 West 28th Street (Site)



Site	Address	Change in Parking Spaces 2003-2013
1	545 WEST 25th STREET	-162
2	220 ELEVENTH AVENUE	-150
3	534 WEST 28th STREET	-101
4	282 ELEVENTH AVENUE**	9
5	505 WEST 29th STREET	-130
6	506-530 WEST 30th STREET	-113
7	529-530 WEST 29th STREET	-64
8	431-435 WEST 33rd STREET	-77
9	560 WEST 26th STREET	-48
10	613 WEST 29th STREET	-46
11	401 WEST 25th STREET*	6
12	323 TENTH AVENUE	40
13	549 WEST 23rd STREET	70
14	169 TENTH AVENUE	-134
15	314 ELEVENTH AVENUE	181
TOTAL		-719

*Site P11 was formerly a non-DCA licensed 20 space parking lot on NYCHA property.

**Site P4 is being developed using the address 525 West 28th Street (see Site R9).



Table 1 - New and Expected Future Residential Developments (2003-2013)

Map ID	BBI	Street Number	Street Name	Tax Block	Tax Lot	Distance from Project Site	Residential Units in 2003	Residential Units Current & Future	Erroneous Data	Residential Units Net Change	Parking Spaces Permitted AOR	Parking Spaces Total Built	Parking Spaces Unbuilt	Cross Reference Table 2 Map ID	DCA License Number	Building Status & Year	Notes
R1	1007517501	360	WEST 28 STREET	751	7501	1,518.91	0	17		17	3	0	3		N/A	2004	
R2	1007237502	401	WEST 25 STREET	723	7502	915.82	0	168		168	34	26	8	P11	N/A	2011	
R3	1007237501	263	9 AVENUE	723	7501	798.31	0	50		50	10	0	10		N/A	2006	
R4	1007227501	418-426	WEST 25 STREET	722	7501	1008.85	0	67		67	13	0	13		N/A	2008	
R5	1007220051	426	WEST 25 STREET						12				0				(duplicate entry)
R6	1007010062	314	11 AVENUE	701	62	616.17	0	369		369	73	181	0***	P16	1345891	2010	
R7	1007010042	500	WEST 30TH STREET	701	42	642.28	0	256	389	256	51	0	51		1060717	2012	
R8	1007010016	529	WEST 29TH STREET	701	16	454.26	0	139	126	139	28	36	-8	P7	1083289	2012	
R9	1007000009	525	WEST 28TH STREET	700	9	272.25	0	710		710	142	143	-1	P4	N/A	2013	Special permit for 52 parking spaces 2004
R10	1006997502	540	WEST 28 STREET	699	7502	172.75	0	91	90	91	18	0	18		N/A	2010	
R11	1006990033	303	10 AVENUE	699	33	353.12	0	89		89	18	0	18		N/A	2010	
R12	1006990009	537	W 27 ST	699	9	201.65	0	28		28	6	0	6		N/A	2011	
R13	1006967502	245	TENTH AVENUE	696	7502	864.52	0	18	14	18	4	0	4		N/A	2010	
R14	1006957507	515	WEST 23 STREET	695	7507	1096.75	0	42	11	42	8	0	8		N/A	2011	
R15	1006957506	200	11 AVENUE	695	7506	1053.54	0	15	12	15	3	14	-11		N/A	2009	
R16	1006957505	519	WEST 23 STREET	695	7505	1123.85	0	11		11	2	0	2		N/A	2007	
R17	1006957504	231-23	TENTH AVENUE	695	7504	1007.79	0	22	16	22	4	0	4		N/A	2006	
R18	1006957503	549	WEST 23 STREET	695	7503	1104.72	0	336	337	336	67	70	-3	P13	1214704	2006	
R19	1006957502	521	WEST 23 STREET	695	7502	1086.05	7	6		-1	1	0	1		N/A	2004	
R20	1006950065	552	WEST 24TH STREET	695	65	1186.68	0	8		8	2	0	2		N/A	2012	
R21	1006950044	508	WEST 24TH STREET	695	44	1001.71	0	14	15	14	3	0	3		N/A	2012	
R22	1006940039	500	WEST 23 STREET	694	39	1315.22	0	111	109	111	22	0	22		N/A	2011	
R23	169 10th Avenue	169	10TH AVE	692	30	1,827.96	0	32	0	32	6	9	-3	P14	N/A	Under Construction	
Totals							7	2599		2592	518	479	147				

NOTES

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

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

*Residential unit counts shown in red are believed to be erroneous data. Counts in black (used in our calculations) were taken from the most recent Certificate of Occupancy, or DOB Job Filing.

**Site R5 is a duplicate entry.

**Site R9 was formerly known as 282 Eleventh Avenue; see Site P4.

***Site R6 includes a 73 space as-of-right accessory parking facility, and a 108 space public parking facility, per C 070233 ZSM, for a total of 181 parking spaces; see Site P14.

Table 2 - Residential Parking Change (2003-2013)

Map ID	BBL	Street Number	Street Name	Tax Block	Tax Lot	Distance from Project Site	DCA Parking Spaces in 2003	% of Residential Spaces Lookback	Total # of Residential Spaces Lookback	DCA Total Parking Spaces Current	Net Change in DCA Spaces	% of Residential Spaces Current	Total # Residential Spaces Current	Net Change in DCA Resi Spaces	Cross Reference Table 2 Map ID	Notes
P1	1006977501	545	WEST 25 STREET	697	7501	620.57	162	30%	48.6	0	-162	0%	0	-48.6		
P2	1006970001	220	11 AVENUE	697		689.98	150	30%	45	0	-150	0%	0	-45		
P3	1006990014	534	WEST 28 STREET	699	14	50.8	144	30%	43.2	43	-101	30%	12.9	-30.3		
P4	1007000009	282	11 AVENUE	700	9	395.33	134	30%	40.2	143	9	0%	143	102.8		R9
P5	1007010033	505	WEST 29TH STREET	701	33	466.42	130	30%	39	0	-130	0%	0	-39		
P6	1007010044	506-530	WEST 30 STREET	701	44	547.62	113	30%	33.9	0	-113	0%	0	-33.9		
P7	1007010016	529-539	WEST 29 STREET	701	16	458.9	100	30%	30	36	-64	100%	36	6		R8
P8	1007310022	431-435	WEST 33 STREET	731	22	1,755.89	77	30%	23.1	0	-77	0%	0	-23.1		
P9	1006970060	560	WEST 26 STREET	697	60	591.31	48	30%	14.4	0	-48	0%	0	-14.4		
P10	1006750012	613	WEST 29 STREET	675	12	1004.76	46	30%	13.8	0	-46	0%	0	-13.8		
P11	1007237502	401	W 25TH ST	723	7502	915.82	20	30%	6	26	6	100%	26	20		R2
P12	1007000034	323	10 AVENUE	700	34	418.77		30%		40	40	30%	12	12		
P13	1006957503	549	W 23RD ST	695	7503	1,119.28		30%		70	70	100%	70	70		R18
P14	1006920030	169	10TH AVE	692	30	1,827.96	143	30%	42.9	9	-134	100%	9	-33.9		R23
P15	1007010062	314	11 AVENUE	701	62	899.74		30%		181**	181	100% / 30% ***	105.4	105.4		R6
Totals							1267		380.1	548	-719		414.3	34.2		

NOTES

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

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

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

*Site P4 is former Lots 1,9, 18; see Site R9.

**Site P14 includes a 73 space as-of-right accessory parking facility, and a 108 space public parking facility, per C 070233 ZSM, for a total of 181 parking spaces; see Site R6.

***Consistent with the methodology used throughout this analysis, new accessory parking spaces in residential buildings are 100% assigned as residential spaces, while new parking spaces in public parking facilities are 30% assigned as residential spaces.

Table 3 - Associations

Applicant Project Name	BBL	Community District	Street Number	Street Name	Community District	Study Period	ULRP #	CPC Review Session Date	Residential Units Proposed	Parking Spaces Proposed	Proposed ADP Parking Spaces	Number of Parking Spaces to Associate	Number of Sites Associated
530 West 28th Street	100690049	104	530	West 28th Street	104	2003-2013	Project ID: P2014M0298	---	36	39	7	32	5

Street Number	Street Name	Community District	BBL	Association Site		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	Type A Association Only:				Type B Association Only:		Type C Association Only:			Notes
				PlotX	PlotY						New Residential Development with Unbuilt Parking	Number ADP Parking Spaces	Number of Unbuilt Accessory Parking Spaces	DCA Lost Residential Parking Spaces For Lookback Period	Difference in DCA Residential Parking Capacity for Lookback Period	Applicant Self-Association Lost Residential Parking Capacity	DCA Residential Parking Capacity	Expected Loss in Residential Capacity		
540	West 28th Street	104	10069252	989723	762465	172.25	8	2023	R10	2010	91	38	38	N/A	N/A	N/A	N/A	N/A	N/A	
542	West 27th Street	104	10069003	989723	762465	172.25	8	2023	R12	2011	89	38	38	N/A	N/A	N/A	N/A	N/A	N/A	
592	East 26th St	104	100693053	989604	272595	359.22	8	2023	R11	2010	89	38	38	N/A	N/A	N/A	N/A	N/A	N/A	

NOTES

- Type A: New Residential Development with Unbuilt Parking
- Type B: DCA Lost Residential Parking Spaces
- 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 associate with multiple sites and multiple types.
- Map ID: 1: The identification number of the applicant, but it changes, the number parking spaces
- BBL: The borough identification number of the site with no hyphen or dash
- PlotX and PlotY: coordinates for measure and site identification
- Distance from Project Site: 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 have 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: 1: see 10 number from table 1 and / or table 2: proposed spreadsheet
- Notes: optional column for project notes and description

APPENDIX

Discrepancies between DOB research and DCP data regarding new residential units created 2003-2013

500 West 30th Street - The most recent CO/Job Filing indicates 256 residential units. Data from DCP indicated 389 residential units.

529 West 29th Street - The most recent CO/Job Filing indicates 206 residential units. Data from DCP indicated 126 residential units which was later updated to 139 residential units.

540 West 28th Street - The most recent CO/Job Filing indicates 91 residential units. Data from DCP indicated 90 residential units.

245 Tenth Avenue - The most recent CO/Job Filing indicates 18 residential units. Data from DCP indicated 14 residential units.

515 West 23rd Street - The most recent CO/Job Filing indicates 42 residential units. Data from DCP indicated 11 residential units.

200 Eleventh Avenue - The most recent CO/Job Filing indicates 15 residential units. Data from DCP indicated 12 residential units.

231-23 Tenth Avenue - The most recent CO/Job Filing indicates 22 residential units. Data from DCP indicated 16 residential units.

549 West 23rd Street - The most recent CO/Job Filing indicates 336 residential units. Data from DCP indicated 337 residential units.

508 West 24th Street - The most recent CO/Job Filing indicates 14 residential units. Data from DCP indicated 15 residential units.

500 West 23rd Street - The most recent CO/Job Filing indicates 111 residential units. Data from DCP indicated 109 residential units.

169 Tenth Avenue - The most recent DOB Filing indicates 32 residential units. Data from DCP did not show any change in residential units.