



CITY OF NEW YORK

**MANHATTAN COMMUNITY BOARD FOUR**

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**BURT LAZARIN**  
Chair

**JESSE R. BODINE**  
District Manager

March 14, 2019

Marisa Lago, Chair  
City Planning Commission  
120 Broadway, 31<sup>st</sup> Floor  
New York, NY 10271

**Re: Special Permit for 139-Space Accessory Parking Garage at 515 West 18<sup>th</sup> Street**

Dear Chair Lago:

At its regularly scheduled full Board meeting on March 6, Manhattan Community Board 4 (CB4), voted 38 in favor, 0 opposed, 1 abstaining and 0 present but not eligible to vote to recommend denial of the application for a special permit under ZR 13-45 and ZR 13-451 for an additional 139 parking at 515 West 18<sup>th</sup> Street. The Board believes that the test determining eligibility for the special permit is seriously flawed and inapplicable to West Chelsea; the additional parking would negatively impact the neighborhood character, and a one-to-one car/parking ratio does not reflect car ownership trends. This recommendation reflects the vote of its Chelsea Land Use Committee at its February 21<sup>st</sup> meeting.

**Background**

The proposed development at 515 West 18<sup>th</sup> Street is an as-of-right mixed use building occupying Block 690 Lots 12, 20, 29, 40,54 and 7501 in a C6-2 and a C6-3 district in the Special West Chelsea District. The site is adjacent to the High Line and one block from the Hudson River Park esplanade with Chelsea Piers on the west side of the HRP. The development will have 181 residential units, and 20,000 square feet of commercial space. Under ZR 13-11(a) the site is permitted 36 accessory parking spaces for the residential units and five accessory parking spaces for the commercial square footage. The proposed garage will be located in the basement with a 22-foot curb cut entrance on West 18<sup>th</sup> Street.

The applicant is seeking special permit approval for an additional 139 spaces in the proposed garage. According to the applicant, if some accessory parking spaces are not used by the residents of the building, they will be offered for rent to non-residents. The addition of 139 parking spaces to the 41 as-of-right spaces would total 180 parking spaces and result in a one-to-one ratio of cars to apartments.

**Analysis**

The approval of the special permit requires the applicant to satisfy specific findings.

ZR-45 c 1: “the location of the vehicular entrances and exits ....will not unduly interrupt the flow of pedestrian traffic associate with uses or public facilities...”

ZR-45 c 3: “such uses will not create or contribute to serious traffic congestion and will not unduly inhibit surface traffic and pedestrian flow”

West 18<sup>th</sup> Street has a heavy pedestrian flow because the High Line is across the street from the site and because West 18<sup>th</sup> Street leads to the Hudson River Park and Chelsea Piers, only half a block away from 515 West 18<sup>th</sup> Street. The Department of City Planning found that in July 2017, in a 12-hour period there were 7,600 pedestrians. The addition of 139 cars entering and leaving mid-block on West 18<sup>th</sup> Street would interrupt the flow of pedestrian traffic on that block.

ZR- 45 c 5: “such parking facility will not be inconsistent with the character of the existing streetscape.” The existing streetscape is not car-oriented. Thousands of visitors to the High Line, Hudson River Park and Chelsea Piers walk from nearby public transit or ride bicycles.

ZR 13-451: “Additional parking spaces for residential growth”: "the number of off-street parking spaces in the proposed parking facility is reasonable and not excessive in relation to recent trends in close proximity to the proposed facility..." The Department of City Planning addressed the issue of reasonableness by developing methodology to calculate a "parking ratio." The calculation of the parking ratio requires consideration of new residential dwelling units, and new and lost parking spaces during a ten-year look-back period through the completion of the proposed facility.

The Board has gone on record (see enclosed CB4 2015 letter for special permit of accessory parking for 530 West 28<sup>th</sup> Street) with its opinion that this methodology is no longer relevant to West Chelsea. At the beginning of the mandated ten-year look-back period, West Chelsea was a manufacturing district with a large over-supply of off-street parking caused by warehousing vacant lots as parking facilities, pending favorable economic and social conditions for development. Since there were few residences these parking spaces largely accommodated transient users, not residential users.

The neighborhood has changed dramatically since the DCP parking guidelines were established. The building at 515 West 18<sup>th</sup> Street is surrounded by new residential developments and is in the center of a tourist destination, between the High Line Park, the Hudson River Park and Chelsea Piers.

The Board is concerned by the increasing traffic created by new residential developments in West Chelsea, and by buses bringing tourists to the High Line, art galleries and the new Whitney Museum. Encouraging additional traffic by increasing residential parking will exacerbate traffic congestion.

We are also concerned that if the special permit were approved for the additional 139 parking spaces, these spaces would not be fully utilized by the residents in 515 West 18<sup>th</sup> Street. Department of City Planning 2015 data for vehicle ownership in the Manhattan core indicates that vehicle ownership rate was 23 percent. The rate was 34 percent for households earning \$130,00 or more. The applicant states that if all the parking spaces were not used by residents the remaining spaces would be rented to non-residents. This could result in transient parking which we oppose.

### **Conclusions and Recommendation**

The proposed special permit does not satisfy several of the required ZR-45 findings. The additional 139 parking spaces would interrupt the very busy pedestrian flow on West 18<sup>th</sup> Street which is a path to the High Line and to Hudson River Park, and would add to traffic congestion. It is unlikely that the residents of 515 West 18<sup>th</sup> Street will use the spaces at a one-to one ratio with the result that non-residents will rent spaces, resulting in transient use.

The Board has long believed that DCP's methodology to justify additional parking spaces is no longer relevant in West Chelsea which has become a bustling tourist destination and growing residential neighborhood.

CB4 believes that the number of accessory parking spaces should be restricted to those available as-of-right and recommends that the application for a special permit be denied.

Burt, Lee, Betty

Sincerely,



Burt Lazarin  
Chair  
Manhattan Community Board 4



Lee Compton  
Co-Chair  
Chelsea Land Use Committee



Betty Mackintosh  
Co-Chair  
Chelsea Land Use Committee

cc: Hon. Corey Johnson, Speaker of the New York City Council  
Hon. Gale A Brewer, Manhattan Borough President  
Applicant