October 3, 2002

Hon. Amanda Burden Chair City Planning Commission 22 Reade Street New York, NY 10007

Re: Parking Garage at 120 West 21st St.

Dear Chair Burden:

Manhattan Community Board No. 4, having held a duly noticed public hearing on ULURP #030031 ZSM, an application for a 152-space attended public parking garage at 116-122 West 21st Street, voted at its meeting on September 4, 2002 to support to the application for the garage by the vote: 30 in favor, 3 opposing, 1 abstaining, and 0 present but not eligible to vote.

The Board notes that this building was the subject of a recent application for an attended 125-space accessory parking garage that the Board supported with certain concerns but that was withdrawn after some discussion at the City Planning Commission. It believes that the reasons for its support of the previous application remain valid—the serious need for parking in the area arising from the rapidly growing mostly upscale residential development that is bringing large numbers of residents with cars and that at the same time is eliminating current parking resources by building on parking lots. The cars owned by the new residents are not likely to be frequently used at most weekday peak hours and therefore may be assumed not to make a significant net addition to traffic congestion—except perhaps Friday evenings. It appears unlikely that the impact on the building directly to the west and the ground floor art book store located there will be significant given the large reservoir space, the east-west direction of the street, and the absence of significant additions to congestion from peak-hour users of the garage.

The Board maintains its previous concerns about the reality that parking garage operators routinely squeeze larger numbers of cars than regulations allow into their operations, and again asks that space used for cars shall be clearly and accurately demised from space used for other purposes. Since individual parking spaces are not marked on the cellar plan available to us and the number of cars proposed has been reduced from the 179 assumed in the EAS associated with the pre-certification materials, there may be a significant issue here.

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These issues are related to broader concerns that this Board has expressed before: the unreality of present parking regulations in view of the increase in car ownership and in traffic and the leaky boundaries both between accessory and public garages and between parking properly used for parking and other space. The Board hopes that this problem will be on the agenda for zoning reform that we trust this administration will be able to put through.

Now that the application is actually for the public garage that the applicant previously mentioned only as a future possibility, the Board repeats its suggestion that the garage operator might find it advantageous as well as performing a service by making arrangements with some of the nearby stores in the Ladies' Mile for subsidized short-term parking for customers, since many customers might well make larger purchases if they could bring in a vehicle to transport them.

Finally, the Board is glad to acknowledge the significant contribution to the community that the developer has committed himself to make in order to ensure restoration and continued maintenance of the historic Spanish and Portuguese Cemetery directly to the east of the building.

Sincerely,

Simone Sindin

Chair Manhattan Community Board No. 4 Edward S. Kirkland

Chair

Chelsea Preservation & Planning Committee

This letter was passed at Manhattan Community Board No. 4's September 4, 2002 Full Board Meeting.

cc: Local Elected Officials Howard Zipster