

**Stephan R Freid, AIA Architect**  
**Richard Moschella, Architect**  
**Neighbors United Below Canal / Park Row Alliance / Chatham Towers**  
170 /180 Park Row  
New York, NY 10038

May 10, 2019

Mr. Anthony Notaro, Chairman, Community Board 1  
Mr. Patrick M. Kennel, Chair Land Use, Zoning and Economic Development Committee  
Ms. Fern Cunningham, Co-Chair, Land Use, Zoning and Economic Development Committee  
Ms. Diana Switaj, Director of Planning and Land Use

Community Board 1  
1 Centre Street  
Room 2202 North  
New York, NY 10007

RE: CEQR 18DOC001Y  
124 and 125 White Street  
Proposed Jail  
Additional Questions and Objections to DEIS dated March 29, 2019

Dear Mr. Notaro, et al,

I am writing, along with my colleague, Richard Moschella, with additional questions and objections to the proposed jail at 124 and 125 White Street. We are residents in the study areas of the DIES and members of Neighbors United Below Canal (NUBC). Along with other technical experts from NUBC, we are raising concerns and respectfully submit the following questions and objections to the proposed 1,270,000 square foot jail complex at 124 and 125 White Street. I am also attaching my initial letter dated April 8, 2019 for the record and for reference.

We ask that you please consider the points we raise below with respect to zoning, along with the unanswered questions related to the impact to the community and request that you distribute this document along with the Exhibits and attachment to all the Land Use Committee Members of Community Board 1:

- Exhibit 1: Community Objections and Questions
- Exhibit 2: Zoning analysis highlighting zoning ordinance violations especially noting building bulk.
- Exhibit 3: 3D diagram of the proposed jail massing imposed on the neighborhood
- Exhibit 4: Street views with rendered massing images of proposal (Before and After Images)
- Exhibit 5: Shadow Studies of the proposed building.

Given the severe deficiencies and zoning exceedances noted including the physical impact of the bulk of this proposal effecting multiple neighborhoods, only a no vote from the Community Board should be considered. The very issue of Criminal Justice Reform is in a moment of change, affecting the assumptions used and the reason for this jail. The idea of building swing space at Rikers Island to house the people incarcerated in Manhattan Detention Center, given the abuse and inhumane conditions cited by the City, should give everyone pause about the plan, let alone the cost of nearly \$11 billion.

Respectfully submitted,

A handwritten signature in black ink that reads "Stephan Freid". The signature is written in a cursive, flowing style.

Stephan R. Freid AIA  
Richard Moschella, Architect

attachments: Letter from S Freid to CB 1 dated April 8, 2019  
cc: N. Kong, V. Sung, C. Marte, J. Lee, A. Blank

## Exhibit 1

### Community Objections and Questions:

**1. At a minimum the new jail facility must respect the intent of the C6-4 Zoning District, the existing context of the Civic Center and the low-rise character of the adjacent historic Chinatown and Little Italy neighborhoods.**

- The proposed facility far exceeds the allowable FAR. This results in a building that is almost 470,000 square feet overbuilt. (see Exhibit 2: Zoning Issues)
- The facility's proposed floor area, height, bulk and lack of set backs far exceeds the maximum envelope and violates the required sky exposure planes. In addition, the tower lot coverage far exceeds the required maximum allowed.
- The proposed facility's base is much higher than the maximum 85' base height.
- The proposed facility does not provide adequate setbacks as prescribed by the C6-4 Zoning District violating the sky exposure plane.
- The proposed facility eliminates the view corridor established by White Street, which is a vital visual connection between Chinatown, Little Italy and the Civic Center.
- The new facility provides only two of the four required off-street loading berths.
- If a building of this height and scale was proposed by the private sector it would be scrutinized heavily for its massive size and blatant disregard for the existing context and the economic impact it would have to various communities.
- The City is exploiting the deficiencies of the Uniform Land Use Review, just as any unscrupulous private developer would. This is the exact reason an overwhelming amount of New York City residents are calling for an overhaul of the Uniform Land Review Use Procedure.

**2. The ULURP application and DEIS lacks critical information required to determine the full impact of a new jail facility of this size. This is a CONCEPT and is changing daily.**

- Has the City provided proper notification and allowed proper time for Community Board 3 to respond considering Block 167, Lot 1 is partially located within Community District 3?
- Why was there never an EAS for 124 and 125 White Street? This should be required to proceed to the EIS.
- Has the City studied the operational inefficiencies and other challenges associated with operating a multi-story 450' tall jail facility?
- What is the daily plan to transport every person incarcerated to the required outdoor recreation space on the roof?
- What is the fire evacuation plan? Where do the inmates go in the event of a fire?
- Will this new facility be LEED Certified, or achieve some other environmentally sustainable certification?
- Will there be a Public Private Partnership formed to develop and operate this building?

- Has a phasing plan been considered to eliminate the need for a temporary swing space on Rikers Island as well as provide the opportunity to reduce the overall size of the new facility?
- Would smaller jails and courthouses distributed in the county better address the issues of abuse and inhumane treatment and management of people in incarceration?
- Has the City considered the ongoing bipartisan legislative actions aimed at Criminal Justice and Prison reform to reduce the incarceration rate when determining the number of beds needed for the Borough Based Jail System?
- Is there a plan to modernize the current court system to further reduce the need for jail cells and beds?
- How will the reduction of loading berths, for a facility of this size, impact the street level regard to sanitation?
- Is one sally port adequate to handle the load of a jail facility that is over one million square feet?
- Has there been an economic impact study been completed on the damaging effect this new facility and its construction will have on the economic renaissance occurring along Canal street?
- Has the City studied the Design-Build project delivery method and how that could lead to the elimination of any qualitative design and urban planning strategies?
- How does the proposal respond to the US Bureau of Prisons guidelines on decentralization and unit management?
- How does the proposal respond to the US Bureau of Prisons guidelines on decentralization and unit management?
- How does the proposal measurably improve the conditions and quality of life in the facility and at what cost?
- The proposed site is in a flood hazard zone as indicated on the NYC Department of City Planning website. How does the proposed plan address flood concerns?
- With 35 elevators proposed in the current scheme, has the DOC addressed the concerns resulting from the death of a corrections officer in an elevator shaft in 2016 in Pennsylvania? <https://www.foxnews.com/us/prison-guard-inmate-killed-in-fall-down-elevator-shaft-during-fight>
- Will the additional corrections officers take street parking spaces in the neighborhood?
- The Perkins Eastman drawings anticipate outdoor recreation on floors in proximity to dorms, residences and the park. There are numerous residential apartments as well as NYU Lafayette Hall, which houses 1,100 students located near the proposed jail complex. Has the university and other nearby residents and businesses been informed and involved?
- What form of Design Build will the project take?
- Does the city have any successful examples of Design Build projects for complex high-rise construction?
- Simplistic Design Build is not appropriate for complex projects - Design Build with Bridging is.
- As a Design Build project with Bridging would allow both transparency and community input, DOC review of operations, a cost estimate to confirm City's expectations. Without the Bridging approach the city gets a fixed cost, but operational costs, life-cycle costs and quality suffer.
- Will the city require the Design Build team to be NY based or will the city export those good paying design jobs?

## Exhibit 2

### Zoning Analysis – Violations and Deficiencies:

#### General:

The proposed building relies on the combined area of multiple blocks and lots as presented in the DEIS. The project creates a super block from Hogan place on the south to the rear of the senior housing on the north and includes the de-mapping of White Street above which the building would span. Please also refer to my April 8, 2019 attached, which highlights zoning issues to be addressed and corrected

#### Review of Zoning Lot Areas:

Block 198 / Lot 1 124 White Street Detention Facility - White Street to Chung Pak Senior Housing:	42,239 Square Feet
Block 167 / Lot 1 125 White Street Criminal Court- (Hogan Place to White Street)	107,189 Square Feet
<b>Total Lot Area</b>	<b>149,427 Square Feet</b>

Note: White Street will be spanned by the proposed building, but the street area is not part of lot areas.

#### As of Right vs Proposed Analysis:

Regulation	As of Right Zoning	Proposed	Deviation	Mitigation Measure
FAR	10	13.12	3.12 X (31% over)	Reduce building Floor Area to FAR 10
Floor Area based on FAR	1,494,270 sf	1,960,482 sf	<b>466,212 sf</b>	<b>REDUCE PROPOSAL BY 466,212 sf</b>
New Building Square Footage	<b>803,788 sf allowed</b> after demolition of existing North Tower of 124 White Street	1,270,000 sf	<b>466,212 sf</b>	<b>Reduce new Building to 803,788 sf (eliminate 466,212 sf)</b>
Lot Coverage	40% (or 59,711 sf)	100%	72,884 sf minus 59,711 sf = <b>13,171 sf</b>	<b>Reduce foot print by 13,173 sf</b>
Building Base / Street Wall	Base Height allowed = 85 feet	Proposed = 450 feet	<b>365 feet</b>	<b>Create base with appropriate set back at 85 feet</b>

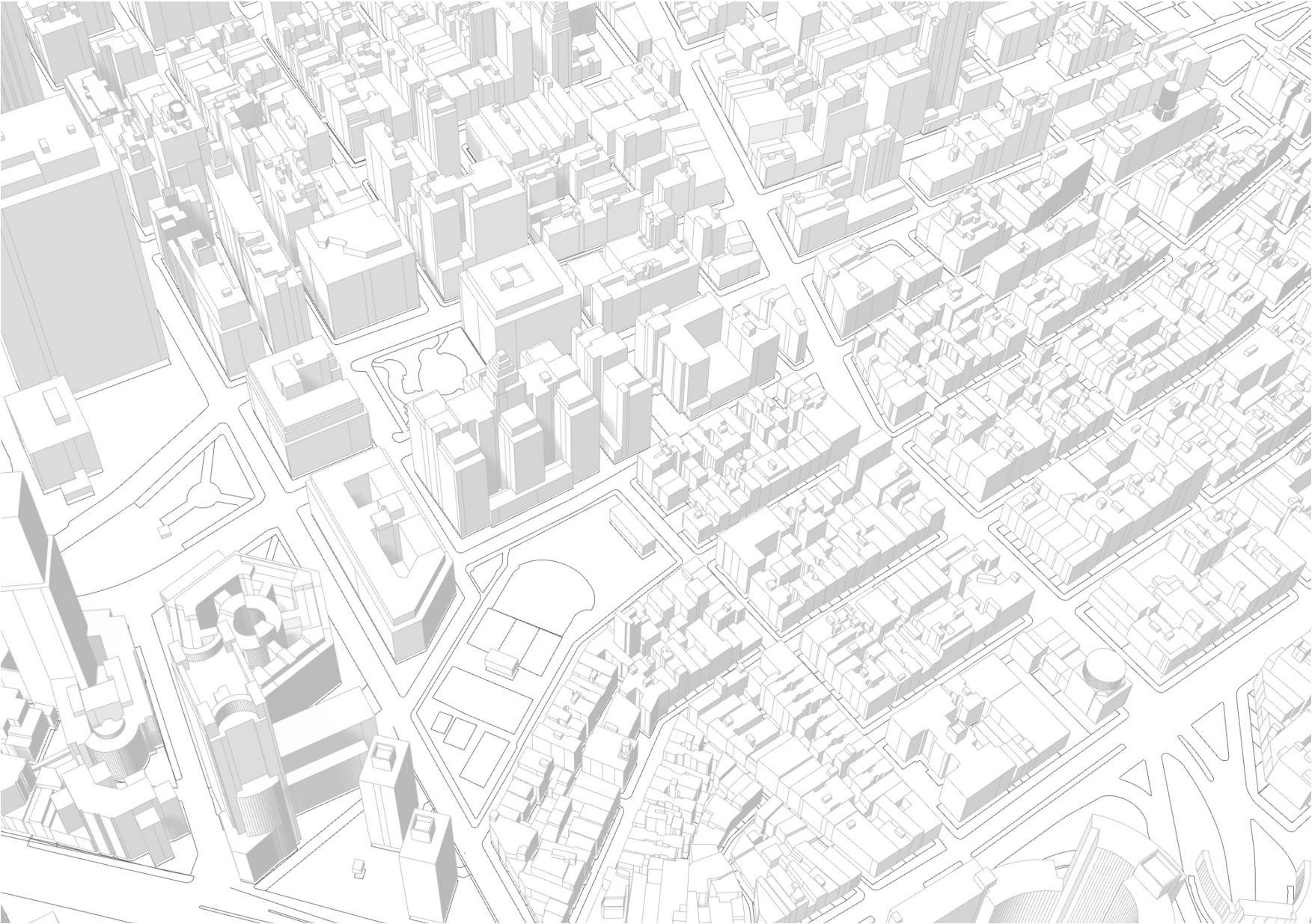
<b>Regulation</b>	<b>As of Right Zoning</b>	<b>Proposed</b>	<b>Deviation</b>	<b>Mitigation Measure</b>
Building Height - Sky Exposure Plane	Ratio of 2.7: 1 at narrow street and 5.6:1 at wide street		<b>Proposal Violates Sky Exposure plane</b>	<b>Create appropriate Set backs</b>
Loading Berths	4 required	2 Provided	2 bays	<b>Provide required loading bays</b>

## Exhibit 3

### 3D Diagram of Proposed Jail Massing Imposed on Neighborhood

# Axonometric - Before

Proposed Jail  
124 -125 White Street



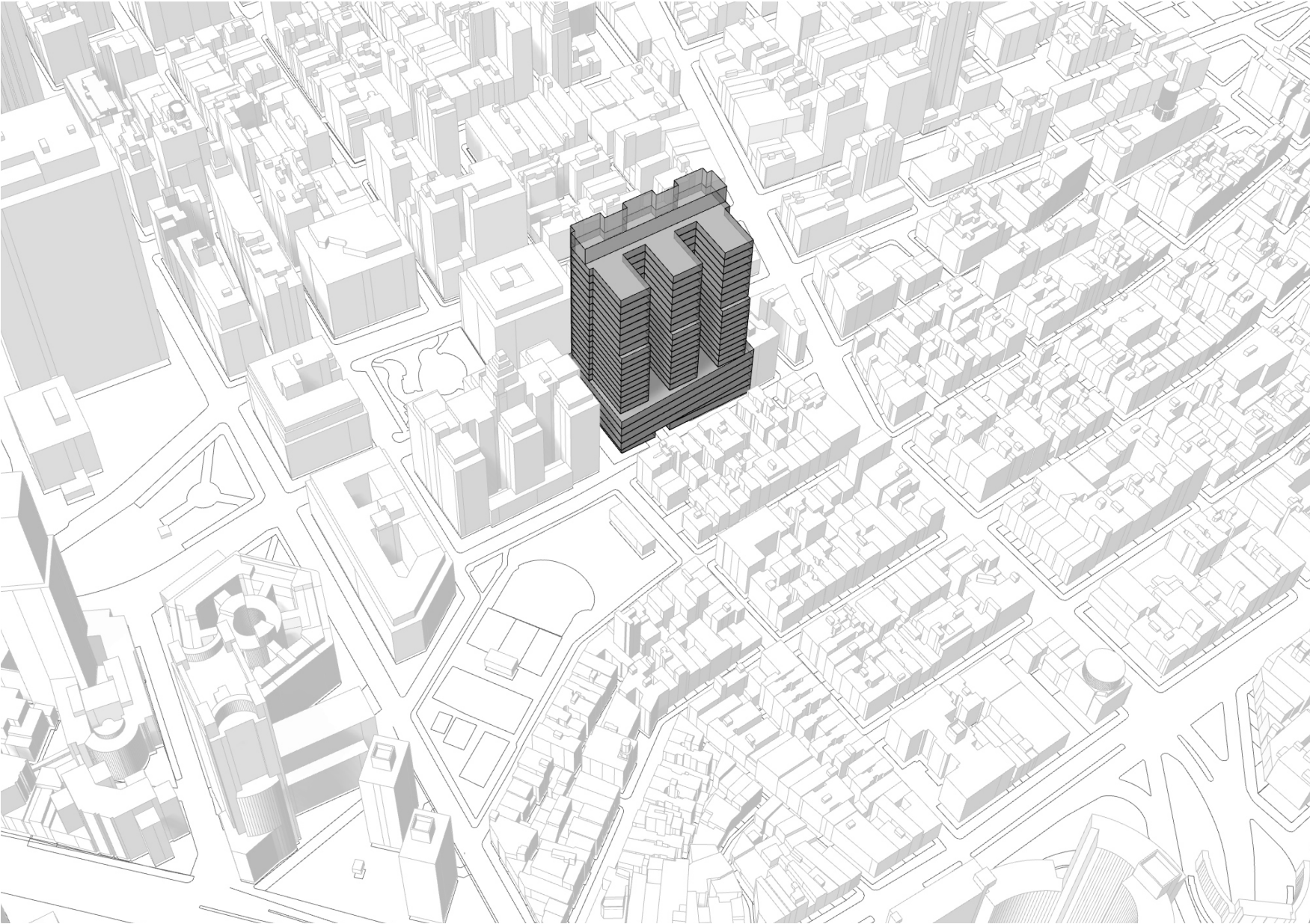
**Stephan R Freid AIA, Architect**  
**Richard Moschella, Architect**

**Neighbors United Below Canal Street**



# Axonometric - After

Proposed Jail  
124 -125 White Street



**Stephan R Freid AIA, Architect**  
**Richard Moschella, Architect**

**Neighbors United Below Canal Street**

## **Exhibit 4**

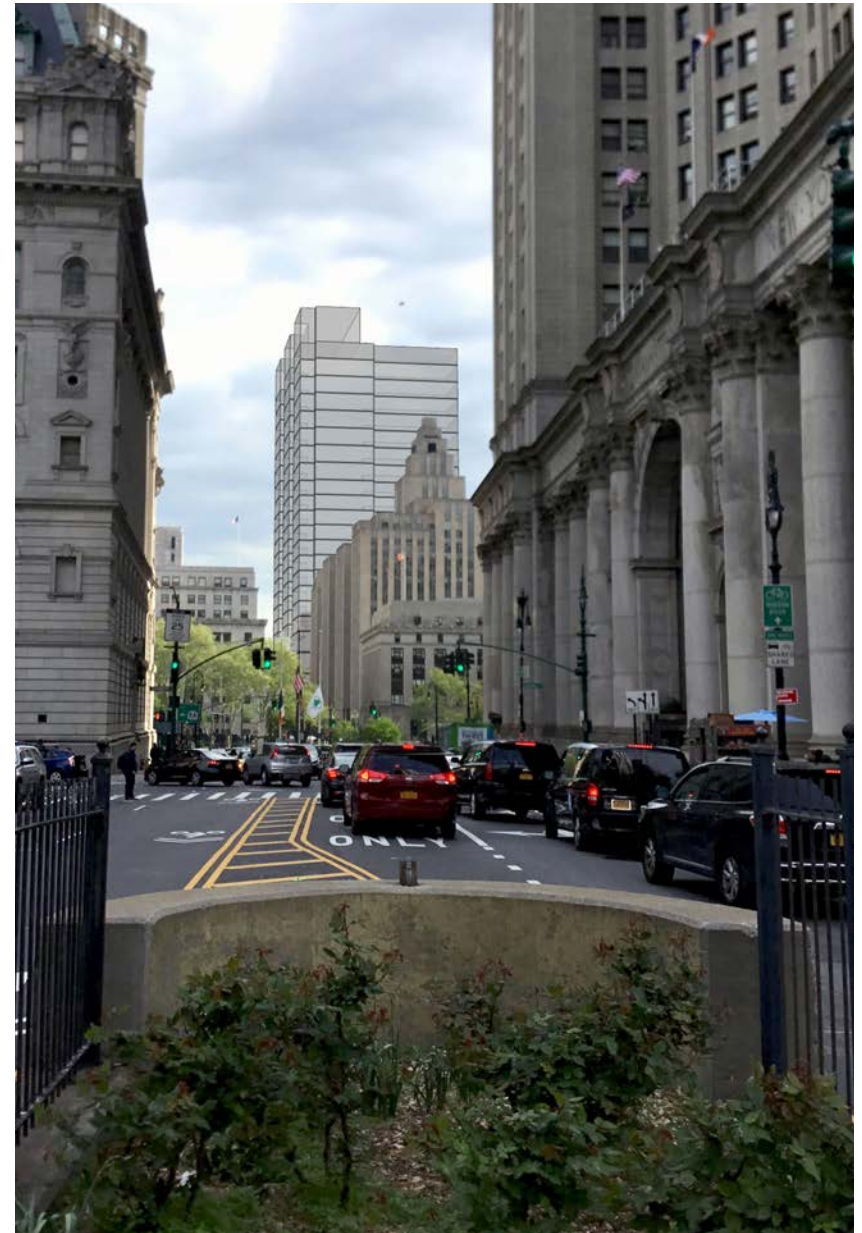
### **Street Views with rendered massing images of Proposal (Before and After Images)**

# Chambers and Centre - Looking Northeast

Proposed Jail  
124 -125 White Street



Existing View  
Corridor



View with MOCJ  
Proposal

Stephan R Freid AIA, Architect  
Richard Moschella, Architect

Neighbors United Below Canal Street

# Chatham Towers - Looking North



**Existing View  
Corridor**



**View with MOCJ  
Proposal**

**Stephan R Freid AIA, Architect  
Richard Moschella, Architect**

**Neighbors United Below Canal Street**

# Mulberry and Worth - Looking Northwest



**Existing View  
Corridor**



**View with MOCJ  
Proposal**

**Stephan R Freid AIA, Architect  
Richard Moschella, Architect**

**Neighbors United Below Canal Street**

# Franklin and White - Looking East



Existing View  
Corridor



View with MOCJ  
Proposal

Stephan R Freid AIA, Architect  
Richard Moschella, Architect

Neighbors United Below Canal Street

# Baxter and Canal - Looking South



**Existing View  
Corridor**



**View with MOCJ  
Proposal**

**Stephan R Freid AIA, Architect  
Richard Moschella, Architect**

**Neighbors United Below Canal Street**

# Howard and Centre - Looking South



**Existing View  
Corridor**



**View with MOCJ  
Proposal**

**Stephan R Freid AIA, Architect  
Richard Moschella, Architect**

**Neighbors United Below Canal Street**



# Canal and Centre - Looking South



**Existing View  
Corridor**



**View with MOCJ  
Proposal**

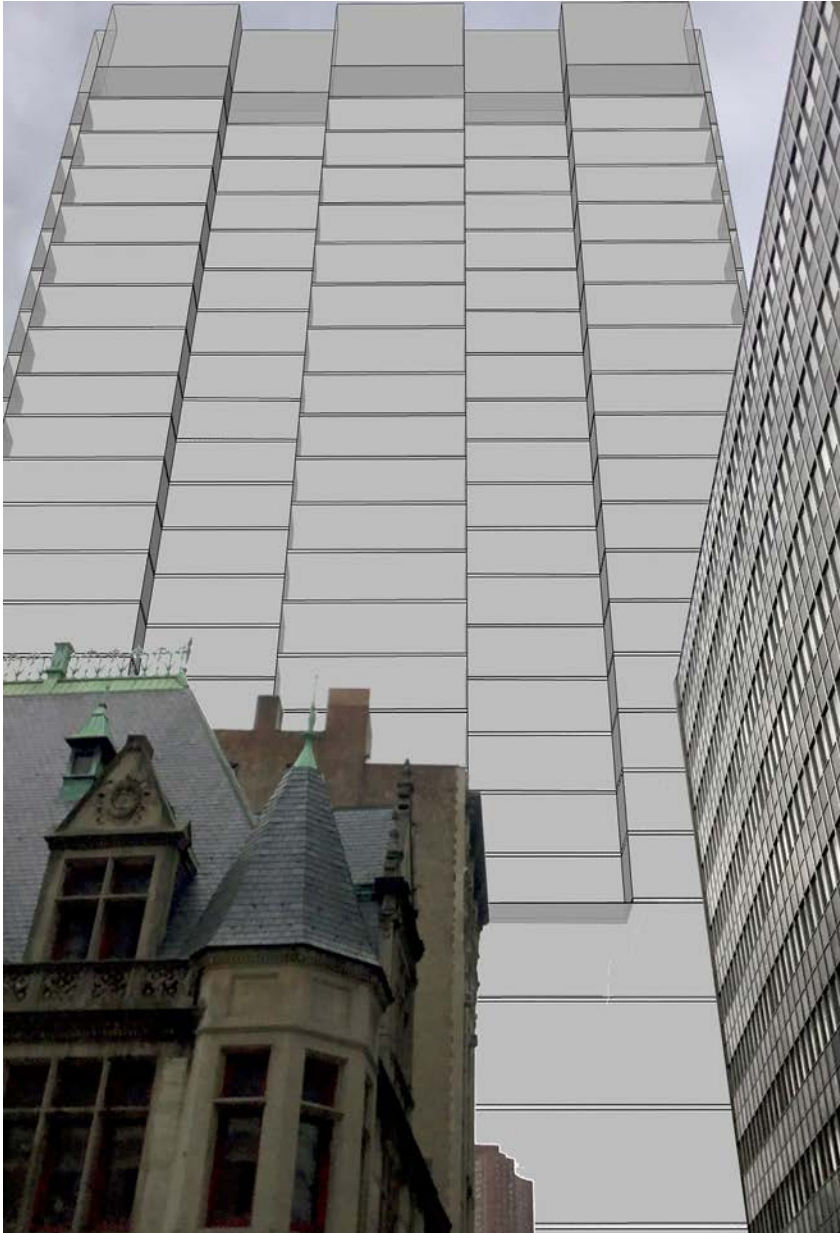
**Stephan R Freid AIA, Architect  
Richard Moschella, Architect**

**Neighbors United Below Canal Street**

# Lafayette and White - Looking East



Existing View  
Corridor



View with MOCJ  
Proposal

Stephan R Freid AIA, Architect  
Richard Moschella, Architect

Neighbors United Below Canal Street

# Pell and Doyers - Looking Northwest



**Existing View**



**View with MOCJ  
Proposal**

**Stephan R Freid AIA, Architect  
Richard Moschella, Architect**

**Neighbors United Below Canal Street**

# Broadway and White - Looking East



**Existing View**



**View with MOCJ  
Proposal**

**Stephan R Freid AIA, Architect  
Richard Moschella, Architect**

**Neighbors United Below Canal Street**

## **Exhibit 5**

### **Proposal Shadow Studies**



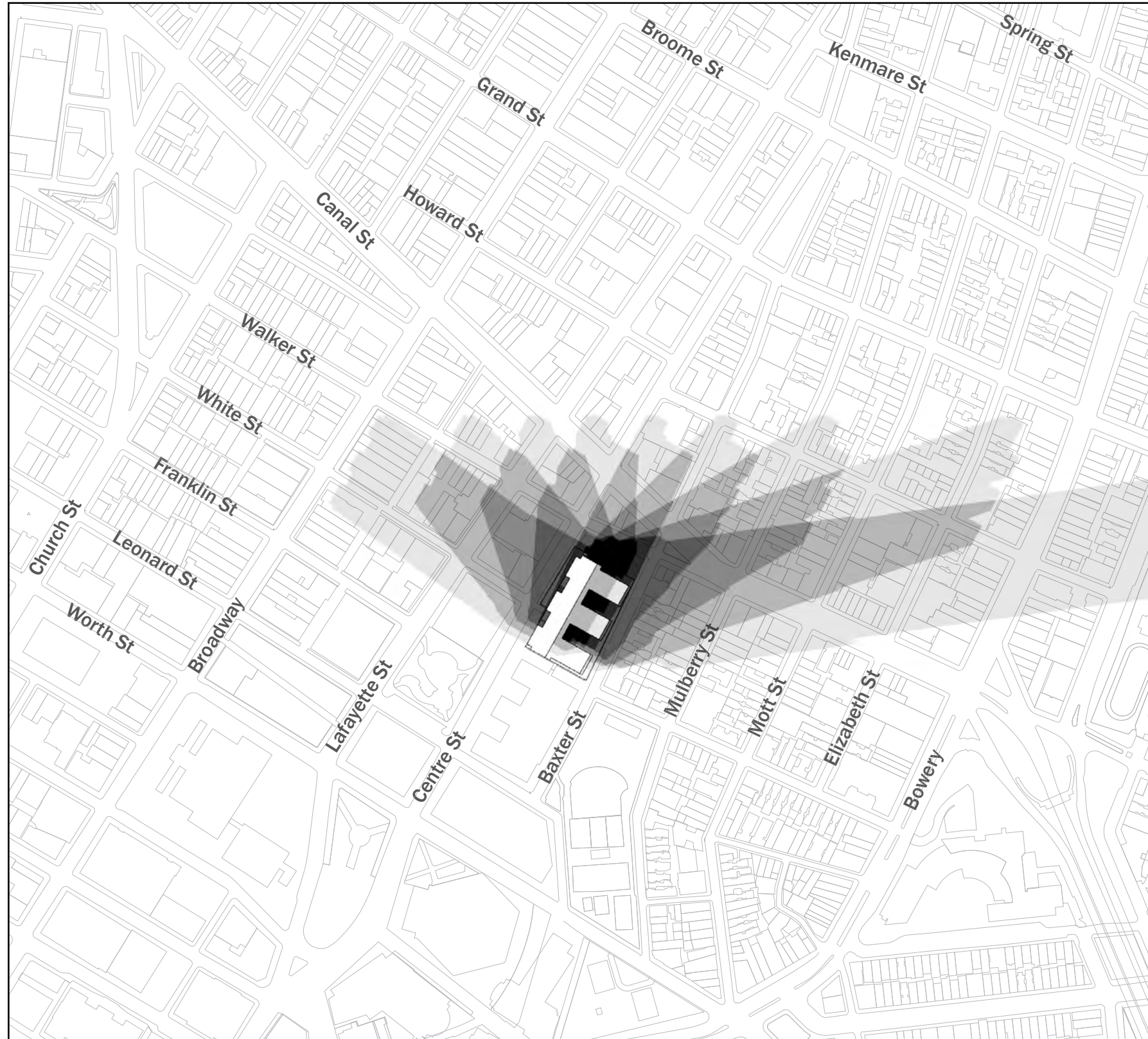
**Proposed Jail  
124 -125 White Street  
Shadow Study**

**Winter**

December, 21st  
From 9am to 5pm

**Stephan R Freid AIA, Architect  
Richard Moschella, Architect**

**Neighbors United Below Canal Street**



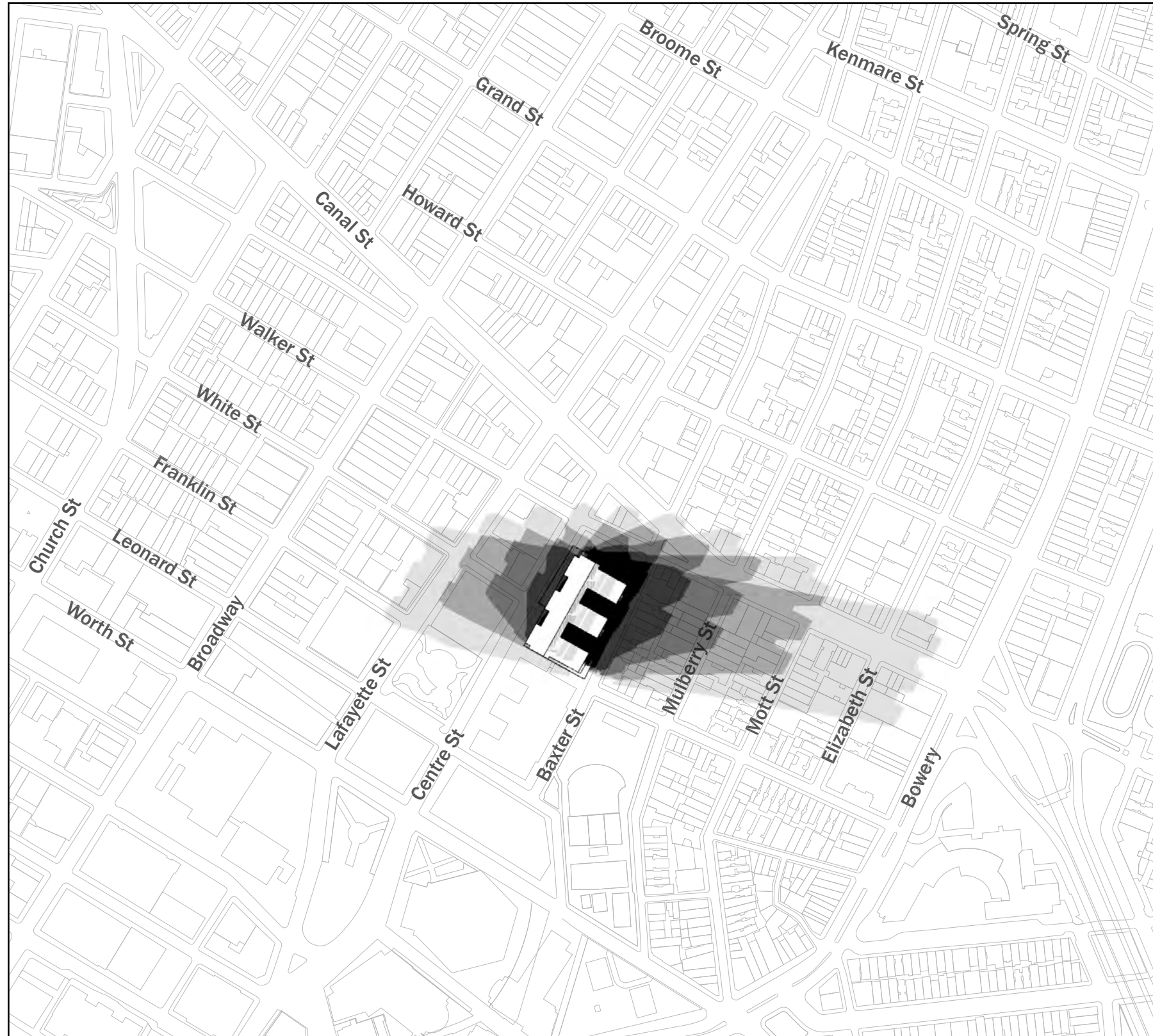
**Proposed Jail  
124 -125 White Street  
Shadow Study**

**Spring / Fall**

September, 21st  
From 9am to 5pm

**Stephan R Freid AIA, Architect  
Richard Moschella, Architect**

**Neighbors United Below Canal Street**



**Proposed Jail  
124 -125 White Street  
Shadow Study**

**Summer**

June, 21st  
From 9am to 5pm

**Stephan R Freid AIA, Architect  
Richard Moschella, Architect**

**Neighbors United Below Canal Street**



Stephan R Freid, AIA  
Park Row Alliance / Chatham Towers  
170 Park Row  
New York, NY 10038

April 8, 2018

Anthony Notaro  
Chairman, Community Board 1  
1 Centre Street  
New York, NY 10007

Land Use Committee  
Community Board 1  
1 Centre Street  
New York, NY 10007

Via: email and hand delivered

Re: CEQR 18DOC001Y  
124 and 125 White Street  
Proposed Jail  
Comments and Objections to DEIS dated March 29, 2019

Dear Mr. Notaro,

I am a resident of Chatham Towers located at 170 Park Row and a member of the Park Row Alliance. I reside in the study areas of the DEIS. I am a New York State Registered Architect and respectfully submit the following comments and objections to the proposed 1,270,000 square foot jail complex at 124 and 125 White Street.

Aside from the issue of erecting a high rise jail complex in our community and the appropriateness of the scale and relationship to the neighboring Courthouse, Senior Housing and Columbus Park, I submit the following specific objections for consideration by the CB # 1 Land Use Committee.

**Zoning:**

The proposed scheme clearly violates the NYC Zoning Ordinance as stated on page 4.1-14 of the DEIS. The DEIS states that a variance will be needed to increase the allowable FAR (Floor Area Ratio) from a factor of 10 to a factor of 13.15. (or a **31.5 % increase over allowable**)

The zoning calculations are based on the creation of a super-block extending from Hogan Place to White Street (Block 167/ Lot 1) and from White Street to the rear wall of the senior housing (Block 198 / Lot 1). This will create an “over build” on White Street. The square footage is further explained as follows:

As stated in the DEIS (page 4.1-14), the zoning ordinance allows for a maximum 1,494,270 zoning square feet to be built on this combined site. (This is without mechanical space or underground space). Given the demolition of the existing 438,744 square foot jail complex and construction of the new proposed 1,270,000 (stated as “approximately” on page 4.1-13), the new jail will create a building complex of 1,965,001 square feet. ***This violates the zoning ordinance by 470,731 square feet.***

To summarize:

The proposed jail ***will be 831,256 square feet larger than the existing jail.*** (New 1,270,000 Square Foot Jail vs existing 438,744 Square Foot Jail)

***The zoning ordinance will allow for an additional new building of 799,269 square feet after demolition of the existing facility. Therefore, the 1,270,000 sf proposed building needs to be reduced by 470,731 square feet. The program for this proposal needs to be radically reduced by a factor 37%.*** To date the mayor’s office has discussed minor changes to the program (such as moving the mental health facility to a hospital), but given this zoning violation, extreme reprogramming needs to occur.

Note that page S-48 of the DEIS states: “The proposed project would not result in significant adverse impacts to land use, ***zoning*** or public policy”. Zoning is certainly adversely impacted.

Any variance application will need to go through the standard public process including a Board of Standards and Appeals Public Hearing, City Planning Commission and the City Council. As stated in the Zoning Resolution, Article VII: Administration, Chapter 2 Interpretation and Variances: “. the variance, if granted, will not alter the essential character....” If given, a variance of this magnitude will certainly radically alter the character of both the immediate neighborhood and lower Manhattan.

The community deserves a clear explanation of the zoning variance process as the Mayor’s office presents this change as a pro forma assured approval. That cannot be the case given the multiple approval authorities and community input required by law. We believe in fact that there will be no case for a “hardship” argument. This variance would certainly not be granted to a private developer. The city should not be violating its own laws.

**Design / Build Delivery Method:**

DDC has stated that this project will be a “Design / Build” delivery method. Not only has the DDC never done a Design / Build project, this method is wholly inappropriate for a sensitive public project. In Design /Build, a Construction Manager (Contractor) will lead the process and hire an Architect. The contractor is incentivized to reduce costs and deliver the basic program for the least expensive way possible. This results in significant reductions in the quality and final design of the building including changes to the shape of the building and the façade aesthetics. A traditional “Design / Bid / Build”

process with appropriate Value Engineering occurring during the design process will yield the quality expected and give the community certitude as to the final design. Without this, all of the discussions and presentations on the building form to date will be unraveled.

**Other Comments on the DEIS:**

1. Zoning is C4-6: This does not allow for a Jail function. Zoning variance should not be given.
2. DEIS does not address specific Demolition and Construction issues requiring mitigation, especially due to the adjacent senior housing. More detail needs to be contributed by the consulting construction manager.
3. DEIS is silent on a required Licensing Agreement with the senior housing to address damage during construction. A License Agreement needs to be in place.
4. Statements in the DEIS (page S-53) referring to other tall buildings in lower Manhattan as justification for this proposal (in violation of FAR) are irrelevant and frankly insulting. (see my annotations attached)
5. Statement (page S-53) that visual resources would not be effected is blatantly not true. 100 Centre Street is an historic building. This tower behind 100 Centre will ruin the profile and North façade of the historic building. It is stated that the new building will be similar in height and form to 100 Centre Street. That is an outrageous statement.
6. White Street overbuild: Quality of this space with light and air is critical. Otherwise this will be a mean dangerous tunnel.

**Text from my October 22 Letter previously submitted:**

**Lippman Commission and Other Proposals:**

The Lippman Report repeatedly states in bold italics that *“Rikers must be closed”*. It is apparent to those of us who have read it carefully that this report did not adequately analyze other options to upgrade facilities for the humane treatment of prisoners. To say that the inhumane treatment of prisoners can be solved with new towers in residential neighborhoods is ignoring the fundamentals of prison reform. Even Elias Husamudeen, President of the Corrections Officers Benevolent Association, stated at the scoping hearing on September 27, 2018 that (and this paraphrasing): *“a high-rise prison tower is not manageable. Prisons are horizontal.”*

*It is public record that construction was begun in December 2013 on a new state of the art 620,000 square feet, \$594M jail on Rikers Island. On November 18, 2016 it was suddenly announced that this construction was stopped and the plan put on “pause”. See Council Member Paul Vallone’s shocked reaction in the attached article: <https://www.villagevoice.com/2016/11/18/construction-of-new-rikers-jail-is-officially-on-pause/>*

The Lippman Commission Report in no way addressed any deleterious effect that the borough based jail system would have on local communities. On page 22 of the report states: *“And it solicited public input via community forums, design workshops, and meetings with the faith communities across New York City as well as a website”*. There was absolutely no outreach to the Chinatown community in any way, *until recently after the community objected*

Why the sudden change in plans to abandon the work under way on Rikers Island?

It must also be noted that there is great suspicion that the closure of Rikers is a Real Estate maneuver given the participation private developers and real estate attorneys on the Commission. And the proposal to expand LaGuardia referenced in the report seems to be a farfetched, given that \$8bn worth of reconstruction of the entire existing LaGuardia Airport is currently underway.

Respectfully submitted,



Stephan Freid, AIA

Attachments: Zoning Summary  
Annotated Building Section from NAC Meeting # 2 Agenda  
Annotated Zoning Analysis from NAC Meeting # 2 Agenda

cc:

Office of the Mayor: Marco A Carrion Joseph Thomas Tahirah Moore	<a href="mailto:mcarrion@cityhall.nyc.gov">mcarrion@cityhall.nyc.gov</a> ; <a href="mailto:jthomas@cityhall.nyc.gov">jthomas@cityhall.nyc.gov</a> <a href="mailto:tmoore@cityhall.nyc.gov">tmoore@cityhall.nyc.gov</a>
Mayor's Office of Criminal Justice	US Mail
Borough President Gale Brewer:	<a href="mailto:gbrewer@manhattanbp.nyc.gov">gbrewer@manhattanbp.nyc.gov</a>
Council Member Margaret Chin:	<a href="mailto:pleonard@council.nyc.gov">pleonard@council.nyc.gov</a> <a href="mailto:gli@council.nyc.gov">gli@council.nyc.gov</a> ; <a href="mailto:ichan@council.nyc.gov">ichan@council.nyc.gov</a>
Council Member Robert Holden:	<a href="mailto:rholden@council.nyc.gov">rholden@council.nyc.gov</a>
Council Legislative & Community Director	<a href="mailto:dkurzyna@council.nyc.gov">dkurzyna@council.nyc.gov</a>
US Congresswoman Nydia Velazquez Jacqueline Hsia	<a href="mailto:Jacqueline.hsia@mail.house.gov">Jacqueline.hsia@mail.house.gov</a>
NYS Senator Brian Kavanagh, Danielle Zuckerman:	<a href="mailto:kavanagh@nysenate.gov">kavanagh@nysenate.gov</a> <a href="mailto:dzuckerman.nysenate@gmail.com">dzuckerman.nysenate@gmail.com</a>
NYS Senator Velmanette Montgomery	<a href="mailto:montgomery@nysenate.gov">montgomery@nysenate.gov</a>
NYS Assembly member Yuh-Line Niou, Ting-Ting Zhao	<a href="mailto:info@yuhlineniou.org">info@yuhlineniou.org</a> <a href="mailto:tingting@yuhlineniou.org">tingting@yuhlineniou.org</a> <a href="mailto:Dzuckerman.nysenate@gmail.com">Dzuckerman.nysenate@gmail.com</a>
NYS Assembly member Jo Anne Simon:	<a href="mailto:simonj@nyassembly.gov">simonj@nyassembly.gov</a>
NYS Committeeman Christopher Marte:	Via US Mail
Chair Marisa Lago, City Planning Commission	Via US Mail
Neighbors United Below Canal Street	<a href="mailto:jancrc@gmail.com">jancrc@gmail.com</a> <a href="mailto:nancywkong@yahoo.com">nancywkong@yahoo.com</a>

**Proposed New Jail  
124 / 125 White Street**

**Zoning Calculation**

(Square Footage is stated is Zoning Square Footage, ie:  
without Mechanical and Underground Space)

**1 Summary:**

Requested Total Square Footage	1,965,001 Square Feet
(-) Maximum Allowable Square Footage on Combined Sites	1,494,270 Square Feet
Amount Exceeding Legal Zoning	<b>470,731 Square Feet</b>

**2 Comparison of Existing Jail to Proposed Jail**

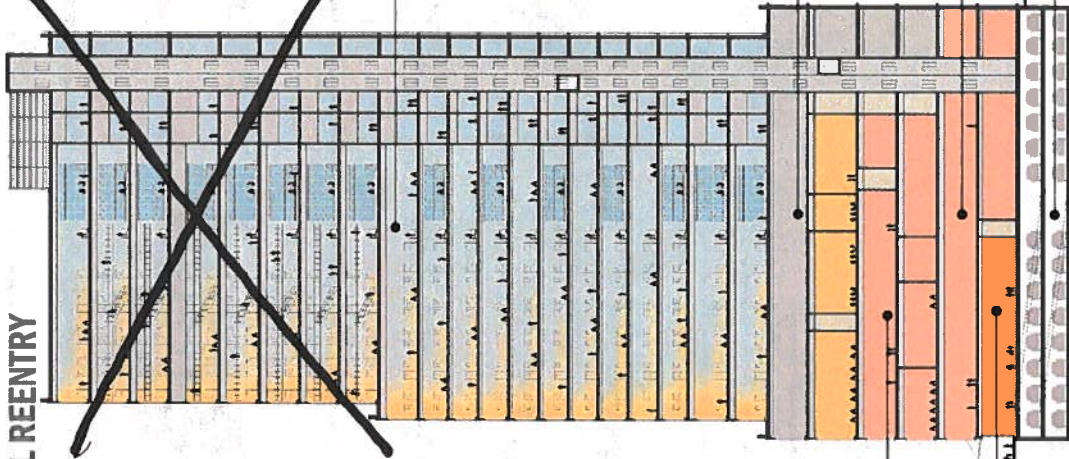
New Proposed Jail	<b>1,270,000</b> Square Feet
Existing Jail Facility Size to be demolished	438,744 Square Feet
Added Square Footage	<b>831,256</b> Square Feet
<b>% Increase in Size of Proposed Jail</b>	<b>290%</b>

**3 Maximum Allowable Size of New Jail Allowed**

New Proposed Jail	1,270,000 Square Feet
Amount Exceeding Zoning	470,731 Square Feet
<b>Maximum Size of New Jail Allowed</b>	<b>799,269</b> Square Feet
<b>% Increase of New Jail Allowed compared to Existing</b>	<b>182%</b>

# BUILDING A MODERN JAIL

PROGRAMMING TO SUPPORT SUCCESSFUL REENTRY



**ELIMINATE!**  
~ 1/3 of proposal  
~ remove 470,731  
sq ft

1,270,000 sq ft

DETAINEE HOUSING

BUILDING SUPPORT /  
MECHANICAL

VISITING

PARKING

DETAINEE SERVICES

COMMUNITY SPACE

BEYOND RIKERS: TOWARDS A BOROUGH-BASED JAIL SYSTEM



# ZONING ANALYSIS

C6-4 DISTRICT

125 White Street/MDC North (Block 198)  
*EXIST* 226,425 ZFA  
 5.56 FAR

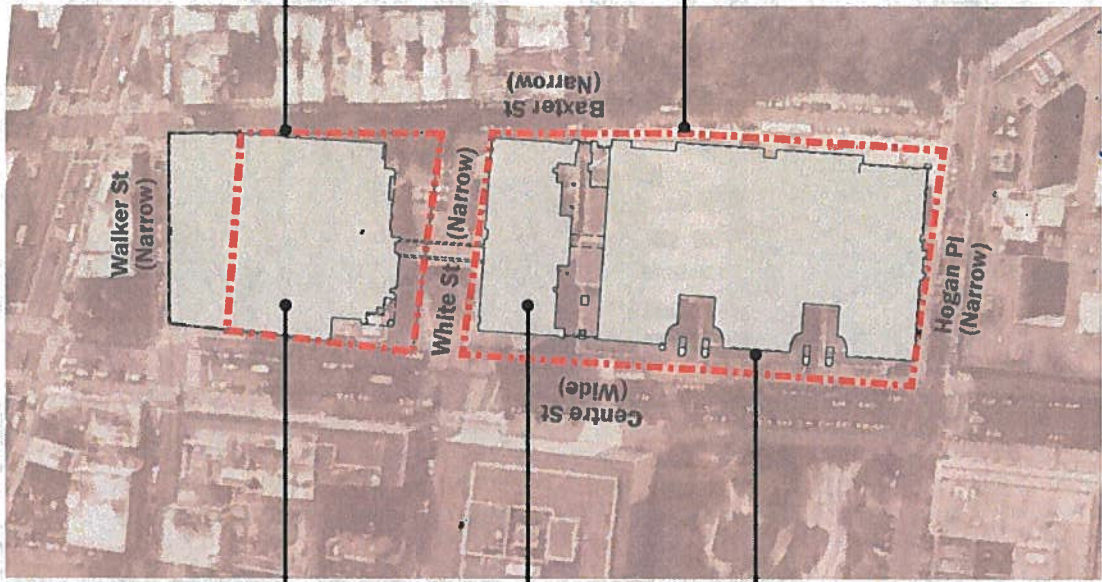
124 White Street/MDC South  
*EXIST* 212,319 ZFA  
 2.01 FAR

100 Centre/Criminal Court  
*EXIST* 815,011 ZFA  
 7.73 FAR

**Total (Block 167)**  
*EXIST* 1,027,330 ZFA  
 9.75 FAR

Total EXI 224,425 (Block 198)  
 1,027,330 (Block 167)

**EXISTING** 1,253,755 ZFA  
 BEYOND RIKERS: TOWARDS A BOROUGH-BASED JAIL SYSTEM



**Block 198 / Lot 1**  
 Lot Area 40,752 SF  
 Max ZFA 407,520 ZFA - *ALLOWED*

**Block 167 / Lot 1**  
 Lot Area 105,394 SF  
 Max ZFA 1,053,940 ZFA - *ALLOWED*

**1,461,460**  
 Total allowed

page 4.11-14 says 1,494,270  
 asking for 1,945,011 ZFA



**DELS**

450,741

**EXISTING** 1,253,755 ZFA