

Letter from Friedman and Gotbaum (on behalf of Applicant) to BSA Chair
Meenakshi Srinivasan, dated December 28, 2007 (5 of 20)

and the Adult Education Program. The current deficiencies of the spaces in which these three programs are forced to exist are detailed below (see page 12).

The floorplate configuration proposed in the Application for classrooms housing these three functions is the minimum response to the zoning lot's unique conditions on the CSI zoning lot, which must also accommodate on a 64 ft wide development footprint the intricate and interconnected needs of the landmarked Synagogue as well. If the groundfloor were available for school uses, a community facility school might well be able to fit the 15 classrooms called for in this Application with an allowable rear yard. However, the floor usually providing the most flexibility for community facility schools, the groundfloor, is entirely unavailable for educational purposes because the Synagogue must "take" all of the groundfloor and portions of floors 2 - 4 for an elevator and landing as well for its own remedial purposes. There are no reasonable alternatives to dedicating nearly the entire first floor of the New Building to Synagogue use because (1) both the CSI community and the Landmarks Commission agree that the Synagogue envelope cannot and should not be compromised to provide new necessary space for Synagogue purposes and (2) the Synagogue's continued use as a house of worship can no longer be compromised by accessibility issues which can only be addressed by "taking" the full footprint on the New Building's first floor.

Thus the question becomes: Can the 15 classrooms and necessary ancillary space required to meet CSI's programmatic needs and mission objectives be accommodated within a bulk envelope that is essentially the allowable footprint above the first floor, which is 64 ft wide by 70.5 ft deep, minus approximately 100 sf from each floor "taken" by the Synagogue for its elevator shaft on each floor?

The answer is no. When taking into account that each floor must provide for adequate circulation and two egress points to stairs, separate lavatories and an adequate total number of offices, it becomes impossible to provide the required classrooms at a standard size within a 64 ft by 70ft footprint, times 3. When one adds the individual bathrooms that must be directly accessed from within each of the six Toddler classrooms, the impossibility becomes even more evident. While a wider site might permit the classrooms to be shifted 90 degrees so that their length could run parallel to the front and rear property lines, the narrowness of the site requires that the classrooms be stacked with their length running north and south, thus generating the noncomplying rear yard condition on floors 2 - 4.

The opponents have suggested that the hardship could be overcome by building another floor to accommodate the two or three classrooms that could not be made to fit on three floors, but the otherwise unnecessary high costs associated with extending the core and mechanicals to another floor to remedy a 640 sf zoning deficiency which exists only in plan (there being sufficient zoning floor area) is a hardship unto itself. Since in this case the hardship has been created solely by the unique conditions of the site, it is clear that an application for these four variances to overcome CSI's programmatic and mission difficulties is appropriate and should be forthcoming.