APPLICATION SUMMARY:
The applicant is requesting a Zoning Map Amendment, to re-zone properties located at 16-38 Lake Avenue & 54-64 Lafayette Place (eight (8) parcels, equal to 94,869 sq. ft. of property) from the RMF Zone to H-2 Zone, (as shown on a re-zoning map on file in the Town Clerk’s Office) per Section 6-22 of the Town of Greenwich Building Zone Regulations.

DETAILS:
The Hospital proposes to re-zone the property located at 16-38 Lake Avenue and 54-64 Lafayette Place from RMF to H-2 to permit the construction of the new Smilow Cancer Center. In comparing the respective zones, the RMF permits four stories and 40 feet similarly to the H-2 Zone and has the same floor area ratio limitation of 0.6. Three of the five properties proposed to be re-zoned are non-conforming, being used for commercial office. The applicant states that the properties are suitable for re-zoning because they are across the street from both the H-1 and H-2 Zones and would enable the hospital to centralize uses in a district that already features hospital services.

The new Smilow Cancer Center facility will enable Greenwich Hospital to provide oncology services to Greenwich residents in town rather than requiring them to go to other facilities outside of town or to the Smilow Cancer Center in New Haven. The advanced services provided at Yale New Haven Hospital will be brought to the town. The building will be in keeping in scale and design with other hospital facilities as well as the surrounding multifamily buildings. Along with other improvements that Greenwich Hospital has made in recent years this will enable the hospital to provide cutting edge medical treatment and maintain its vitality for the community.

POCD:
The re-zoning would carry out objective 6.4 of the Plan of Conservation and Development which calls for the support of Greenwich Hospital’s efforts to provide medical services to Greenwich residents. This re-zoning will meet the intent and purpose of the hospital zones by providing for the development of hospital facilities to meet the Town of Greenwich residents’ major medical needs. The proposed uses for the at the Smilow Cancer Center are all permitted within the H-2 zone including outpatient clinics for specialized medical care; specialized medical clinics facilities that provide medical technical and professional healthcare support to the hospital in connection with its rendition of medical services; including but not limited to diagnostic testing centers and storage facilities for medical equipment, supplies and professional offices for physicians directly involved with the cancer center. The new facility is for outpatient treatment and testing and no inpatient hospital space will be provided.

ISSUES TO BE CONSIDERED:
1) Is this proposal in keeping with the 2019 Plan of Conservation and Development?
a. On the one hand the POCD notes that the hospital should be supported. The POCD also notes the shortage of affordable housing, which is usually in the form of multi-family homes, which is the current zone.

i. Multi-family zoning is being considered to include a below market rate component (See Guiding Principle #2 (Housing needs) and the associated objectives in the 2019 POCD)). A 94,869 sq. ft. of property can potentially support 39 housing units based on the 2,400 sf / family in Section 6-205 although that would need to be studied considering the requirement that the total ground floor area of all buildings and structures shall occupy not more than 30% of the gross lot area.
March 22, 2021

RE: Greenwich Hospital Smilow Cancer Center
15-38 Lake Avenue & 54-64 Lafayette Place, Greenwich, CT 06830

Dear Commission Members,

Greenwich Hospital proposes to re-zone the property at the corner of Lafayette Place and Lake Avenue from RMF to H-2. The property currently comprises eight parcels which are used for housing offices and parking associated with the hospital. Re-zoning would permit the construction of a new Smilow Cancer Center to provide outpatient services. Both the RMF and H-2 zones provide for four stories and 40-foot-high buildings. In addition, the floor area ratio limitation is 0.6 in both zones.

The properties are suitable for rezoning because they are across the street from both the H-1 and H-2 Zones and would enable the hospital to centralize uses in a district that already features hospital services. The re-zoning would carry out objective 6.4 of the Plan of Conservation and Development which calls for the support of Greenwich Hospital’s efforts to provide services to Greenwich residents. This re-zoning will meet the intent and purpose of the hospital zones by providing for the development of hospital facilities to meet the Town of Greenwich residents’ major medical needs.

Therefore, on behalf of Greenwich Hospital we request the re-zoning of properties at 54 to 64 Lafayette Place and 16 to 38 Lake Avenue be re-zoned from RMF to H-2.

Very Truly Yours,

Thomas J. Heagney
NARRATIVE

Introduction:

This is a proposal by Greenwich Hospital to build a new cancer treatment center on property located at the corner of Lafayette Place and Lake Avenue to address the long-term health care needs of the community. The property comprises eight lots with residential, commercial and parking uses on 94,896 square feet. The Plan of Conservation and Development adopted in 2019 speaks to responding to resident healthcare needs and speaks to improvements for the physical plant and outpatient services of the hospital. This is the first POCD which has focused on healthcare needs for town residents.

The concept for a new cancer center was first presented to the Planning and Zoning Commission on February 25, 2020. As was stated at the hearing, Greenwich Hospital has served the community since its founding in 1903 and has been located on Perryridge Road since 1917. After a series of renovations in the 40s, 50s, and 60s, in 1990 the Commission adopted two hospital zones which led to the renovation and construction of the Helmsley Pavilion in 1999 and the Watson Building in 2006. Over the last several years the Hospital has moved services such as physical therapy and occupational therapy to 500 West Putnam Avenue and has converted all semiprivate rooms to private. As part of the Yale New Haven Healthcare System, the goal with the new Smilow Cancer Center is to bring the expertise and treatment available in New Haven to Greenwich. This will not only enable Greenwich Hospital to provide improved treatment and facilities but also provide treatment for residents in Town who have needed to go elsewhere for their care. The then hospital President Norman Roth and COO Diane Kelly, who
is now President, described the improved services and areas of treatment which the new cancer center would bring. The initial concept was an 80,000 square foot 50-foot high facility.

Less than a month after this presentation the country was plunged into a pandemic which absorbed the focus and resources of Greenwich Hospital to treat town residents. On December 1, 2020 we returned to the Commission under the pre-preliminary process and presented a revised proposal which scaled down the size of the building and better defined the services and treatments to be provided. The proposal discussed at that time was a two-story building rather than three and proposed more detailed use of the Bendheim Building.

The proposal we are presenting to you now has been further refined to a building which is 54,865 square feet including the enclosed penthouse area. As a result of these changes there is no need to revise the FAR or height requirements of the H-2 zone. The current proposal is within the 40-foot height and the 0.6 FAR. In order to provide more outdoor space for patients during treatment we are proposing an increase in the building coverage and lot coverage limitations.

We believe the plan we are presenting to you provides for comprehensive cancer treatment for town residents.

**Site Plan and Special Permit:**

The proposed site for the new Smilow Cancer Center comprises eight parcels at the corner of Lafayette Place and Lake Avenue including 54 to 64 Lafayette Place and 16 to 38 Lake Avenue. The parcels are a mixture of apartments, office and commercial uses as well as parking lots. Existing buildings total 37,991 square feet of floor area. The proposed two-story building and penthouse would comprise 54,865 square feet. The proposal includes 118 below-ground and surface parking spaces. The primary entrance drive for the facility will be from Lake Avenue and
there will be a service drive on Lafayette Place. The main entrance to the center will be on the
west side of the building facing the parking lot. Taking advantage of the topography of the site,
the first floor will be at grade on the west side of the building and on the east side, facing
Lafayette Place, the second floor will be at grade with the penthouse above. Extensive
landscaping is provided, and a healing garden is associated with the treatment rooms on the
second floor. Outdoor seating areas are also provided for staff. Exterior materials were designed
to be compatible with and complementary to the existing campus buildings.

The applicant has met with the Town Engineer and the Deputy Commissioner of Public
Works regarding reconfiguration of the traffic circle at Lake Avenue, Lafayette Place, William
Street and Perryridge Road. The proposed plan includes eliminating the crosswalk through the
middle of the traffic circle and locating it to the west on Lake Avenue. This reconfiguration will
alleviate the need for considering a traffic signal or enlarging the traffic circle. An additional
crosswalk with flashing lights will also be installed westerly on Lake Avenue for the facility staff
and patients crossing from the hospital campus to the southside of Lake Avenue.

There will be a slight encroachment of the site wall on Lafayette Place and after
reviewing the matter with the Town DPW we have drafted a License Agreement for the wall. In
addition, a portion of the sidewalk on Lake Avenue is located on the Hospital’s property and we
have provided a draft easement to the Town to cover this.

Our project engineers, Redniss and Mead, have also submitted plans to the Sewer
Division in connection with a new sewer connection for the proposed building. Discussions are
ongoing as to the capacity of the sewer main in Lake Avenue and the one along Horseneck
Brook.
Adler Consulting has prepared a parking and traffic study. The Smilow Cancer Center will operate Monday through Friday from 8:00 AM to 5:00 PM. A comprehensive parking study was done for all of the hospital properties which indicated that by using valet for certain sites and garages, there will be adequate parking available for all proposed and existing uses on the hospital campus. The hospital currently utilizes valet services on a regular basis. The traffic study concluded the levels of service will remain consistent with existing conditions after the construction of the cancer center.

Extensive landscape plans have been prepared which include proposed trees within the town right-of-way. Our landscape architect has been in contact with the Town Tree Warden seeking his review and approval. A photometric plan has been prepared showing that the proposed lighting will meet the 0.1-foot candle limitation at all property lines.

**Re-Zoning:**

The Hospital proposes to re-zone the property located at 16-38 Lake Avenue and 54-64 Lafayette Place from RMF to H-2 to permit the construction of the new Smilow Cancer Center. In comparing the respective zones, the RMF permits four stories and 40 feet similarly to the H-2 Zone and has the same floor area ratio limitation of 0.6. Three of the five properties proposed to be re-zoned are non-conforming, being used for commercial office. The properties are suitable for re-zoning because they are across the street from both the H-1 and H-2 Zones and would enable the hospital to centralize uses in a district that already features hospital services. The re-zoning would carry out objective 6.4 of the Plan of Conservation and Development which calls for the support of Greenwich Hospital’s efforts to provide medical services to Greenwich residents. This re-zoning will meet the intent and purpose of the hospital zones by providing for
the development of hospital facilities to meet the Town of Greenwich residents’ major medical needs. The proposed uses for the at the Smilow Cancer Center are all permitted within the H-2 zone including outpatient clinics for specialized medical care; specialized medical clinics facilities that provide medical technical and professional healthcare support to the hospital in connection with its rendition of medical services; including but not limited to diagnostic testing centers and storage facilities for medical equipment, supplies and professional offices for physicians directly involved with the cancer center. The new facility is for outpatient treatment and testing and no inpatient hospital space will be provided.

**Amendment to H-2 Regulation:**

The proposed Smilow Cancer Center building will be 54,865 square feet including 2,875 square feet of the penthouse mechanical space for a FAR of 0.578. The proposed building will be 39’ 2 3/8” in height from average grade, conforming with the 40-foot-high limit permitted in the zone and will be two stories with the penthouse rather than the four-stories permitted. As part of the proposed site plan there are extensive outdoor landscaped treatment areas for patients, which occupy portions of the site resulting in the building being in excess of 35% of the lot area. The proposed building coverage is 41.1% of lot area, therefore the applicant requests an amendment to the building coverage limitation from 35% to 45%. In addition, lot coverage is proposed to be 77.1% of the lot area rather than the permitted 75%. This additional lot coverage allows for fire apparatus access around the entire building and for a separate delivery area for medical equipment and supplies. Therefore, a modification of the lot coverage limitation from 75% to 80% is requested. Significant landscaping is proposed along both Lafayette Place and
Lake Avenue including street trees shrubs bushes and other plant material. Over 30 trees are proposed along the perimeter of the site and all existing street trees but one will be retained.

**Summary:**

The new Smilow Cancer Center facility will enable Greenwich Hospital to provide oncology services to Greenwich residents in town rather than requiring them to go to other facilities outside of town or to the Smilow Cancer Center in New Haven. The advanced services provided at Yale New Haven Hospital will be brought to the town. The building will be in keeping in scale and design with other hospital facilities as well as the surrounding multifamily buildings. Along with other improvements that Greenwich Hospital has made in recent years this will enable the hospital to provide cutting edge medical treatment and maintain its vitality for the community.

Respectfully Submitted,

Thomas J. Heagney
Dated: March 22, 2021
### Administrative Information
- **Parent Parcel Number**: 07-4071/8

### Ownership
- **Owner**: PERRY RIDGE CORPORATION
- **Tax ID**: 247/006

### Transfer of Ownership

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### Taxing District Information
- **Jurisdiction**: 57 Greenwich, CT
- **Area**: 001
- **Corporation**: 057
- **District**: 07
- **Section & Plat**: 167
- **Routing Number**: 448450002

### Site Description

#### Topography:
- **Public Utilities**: Water, Sewer, Electric
- **Street or Road**: Street or Road:

#### Zoning:
- **R-MF Single & Multi-Family

### Valuation Record

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- **True Tax Value**: 203200
- **Total Land Value**: 203200
GH REALTY HOLDING LLC %GREENWICH

OWNERSHIP
GH REALTY HOLDING LLC %GREENWICH
HOSPITAL-ATTN: REAL ESTATE
8 PERRY RIDGE ROAD
GREENWICH, CT 06830
LOT NO 4 LAKE AVE 55

LAKE AVENUE 0028

TRANSFER OF OWNERSHIP
Printed 02/13/2020 Card No. 1 of 1

Date
11/09/2016
12/05/2014
04/10/2008
04/20/2005
11/01/1999

8 LAKE AVENUE LLC
Bk/Pg: 7159, 79
JANGCHIEN GEORGE M & DEBORAH S
Bk/Pg: 6822, 224
28 LAKE AVENUE LLC
Bk/Pg: 5599, 33
DISSTON ROBIN J
Bk/Pg: 4901, 215
MARGENOT JOHN B JR & DOLO
Bk/Pg: 3349, 344

RESIDENTIAL

VALUATION RECORD

Assessment Year
10/01/2010
10/01/2015
10/01/2015
10/01/2016
10/01/2017
10/01/2018
10/01/2019

Reason for Change
2010 Reval
2015 Prelim
2015 Final
2016 List
2017 List
2018 List
2019 List

VALUATION
Market
I 625500
B 164500
T 790000

Valuation
I 437850
B 115150
T 553000

70% Assessed
I 437850
B 115150
T 553000

LAND DATA AND CALCULATIONS

Land Type
1 Residential Land

Rating
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Measured
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Effective
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Base Value
595000 A -5%

Influence
565300

Supplemental Cards
TRUE TAX VALUE
565300

Supplemental Cards
TOTAL LAND VALUE
565300
**PHYSICAL CHARACTERISTICS**

Style: 2-Family Duplex
Occupancy: Duplex
Story Height: 2.5
Finished Area: 2332
Attic: None
Basement: Full

**ROOFING**

Material: Wood shingles
Type: Gable
Framing: Std for Class
Pitch: Not available

**FLOORING**

Slab $\text{E}$
Sub and joists 1.0, 2.0, 2.5
Base Allowance $\text{B}$, 1.0, 2.0, 2.5

**EXTERIOR COVER**

Wood Siding 1.0, 2.0, 2.5

**INTERIOR FINISH**

Normal for Class B, 1.0, 2.0, 2.5

**ACCOMMODATIONS**

Finished Rooms 12
Bedrooms 6
Formal Dining Rooms 2

**HEATING AND AIR CONDITIONING**

Primary Heat: Hot water - gas

Lower Pull Part
/ heat 1 Upper Upper

**PLUMBING**

3 Fixt. Baths 3 9
Kit Sink 2 2
TOTAL 11

**REMODELING AND MODERNIZATION**

Amount Date

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**IMPROVEMENT DATA**

**SUMMARY OF IMPROVEMENTS**

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**DATA**

Data Collector/Date  Appraiser/Date  Neighborhood  Supplemental Cards  TOTAL IMPROVEMENT VALUE
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# Administrative Information

**Parcels Number**
07-4047/S 07-4047/S

**Parent Parcel Number**

**Property Address**
LAKES AVENUE 0030

**Neighborhood**
123070 NORTH DOWNTOWN [2]

**Property Class**
057 EXEMPT RESIDENTIAL

**Taxing District Information**

**Jurisdiction**
Greenwich, CT

**Area**
001

**Corporation**
057

**District**
07

**Section & Plat**
167

**Routing Number**
448460004

### Site Description

**Topography:**

**Utilities:**
Water, Sewer, Electric

**Street or Road:**

**Zoning:**
R-MF Single & Multi-Occup.

**Legal Acres:**
0.6930

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## Transfer of Ownership

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**Supplemental Cards**

**True Tax Value**
593000

**Total Land Value**
593000
PHYSICAL CHARACTERISTICS
Style: Conventional
Occupancy: Single family
Story Height: 2.0
Finished Area: 1297
Attic: None
Basement: 3/4

ROOFING
Material: Asphalt shingles
Type: Gable
Framing: Std for Class
Pitch: Not available

FLOORING
Slab: B
Sub and joists: 1.0, 2.0

EXTERIOR COVER
Aluminum: 1.0, 2.0

INTERIOR FINISH

ACCOMMODATIONS
Finished Rooms: 6
Bedrooms: 2
Formal Dining Rooms: 1
Fireplaces: 1

HEATING AND AIR CONDITIONING
Primary Heat: Hot water - gas
Lower: Pull Part
Basement: 1
Upper: Upper

PLUMBING
# 3 Fixt. Bats: 1
Kit Sink: 1
TOTAL: 4

REMODELING AND MODERNIZATION
Amount Date
Kitchen: 1 08/15/2007

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SUMMARY OF IMPROVEMENTS

Data Collector/Date: SRN 08/15/2007
Appraiser/Date: TOG 10/01/2015
Neighborhood: Neigh 123076 AV
Supplemental Cards: TOTAL IMPROVEMENT VALUE 143100
GREENWICH HOSPITAL
5 PERRY RIDGE ROAD
GREENWICH, CT 06830
LOT NO 5 LAKE AVE S-6

LAKE AVENUE 0032
Tax ID 247/010

TRANSFER OF OWNERSHIP

Date
03/26/2012 KAYE JEREMY E TR
Br/Pg: 6312, 168 $0
01/31/2012 77 LAKE AVENUE LLC
Br/Pg: 6278, 278 $860000
11/29/2011 ELLIOTT ELIZABETH J
Br/Pg: 6243, 132 $0
05/10/2004 POUNTAIN GIDEON
Br/Pg: 6571, 246 $1100000
07/07/1998 MARGENOT JOHN B JR & DOLO
Br/Pg: W $3550000

RESIDENTIAL

VALUATION RECORd

Assessment Year 10/01/2012 10/01/2015 10/01/2015 10/01/2016 10/01/2017 10/01/2018 10/01/2019

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2. LAND DATA AND CALCULATIONS

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Supplemental Cards
TRUE TAX VALUE 661300

Supplemental Cards
TOTAL LAND VALUE 661300
## COMMERICAL

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### TAXING DISTRICT INFORMATION

| Jurisdiction | 57 Greenwich, CT |
| Area | 001 |
| Corporation | 057 |
| District | 07 |
| Section & Plat | 167 |
| Routing Number | 4484S0008 |

### SITE DESCRIPTION

Topography:

Public Utilities: Sewer, Electric

Neighborhood: LAKE AVENUE 0038

Street or Road: LAKE AVENUE S 7

### TRANSFER OF OWNERSHIP

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### TOTAL LAND VALUE

734300
IMPROVEMENT DATA

PHYSICAL CHARACTERISTICS

ROOFING
Shingle

WALLS
B 1 2 U
Frame
Yes Yes
Metal

GUARD

FRAMING
B 1 2 U
Wd Jst 0 1152 0 0
R Conc 1152 0 0 0

HEATING AND AIR CONDITIONING
B 1 2 U
Heat 1152 1152 0 0

SPECIAL FEATURES

Description Value ID Use Stry Const Hgt Type Grade Year Eff Const Year Cond Base Rate Adj Size or Computed Phys Obsol Market % Value
C MEDOFF 0.00 Avg 1969 1990 AV 0.00 N 0.00 1152 0 0 0 150 100 423600
01 PAVING 0.00 85 Avg 1969 1985 AV 5.20 N 7.80 4000 31200 13 0 100 100 271000

SUMMARY OF IMPROVEMENTS

Item Description Units Cost Total Pct

Base Cost 1152 134.97 155485
Exterior Walls 1152 26.64 30689
Heating & Cooling 1152 24.88 28662
Basic Structure Cost 1152 186.49 214836
Office Basement 1152 154.94 178491
Heating & Cooling 1152 24.84 28155
Building Cost New 1152 365.87 421482
Physical 0 0.00 139088 33.00
Depreciated Cost 1152 245.13 282394
Rounded Total 0 0.00 282400

TOTAL IMPROVEMENT VALUE 450700

(LCM: 150.00)
**COMMERCIAL**

**PARCEL NUMBER**
07-1647/S

**TAXING DISTRICT INFORMATION**
Jurisdiction: 57 Greenwich, CT
Area: 001
Corporation: 057
District: 07
Section & Plat: 167
Routing Number: 64770080

**SITE DESCRIPTION**

**TOPOGRAPHY**
Public Utilities: Sewer, Electric
Street or Road:
Neighborhood:

**ZONING:**
R-MF Single & Multi-Unit
Legal Acres: 0.5170

**LAFAYETTE PLACE 0054-56**

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**Supplemental Cards**

**TRUE TAX VALUE**: $1236000
**IMPROVEMENT DATA**

**SPECIAL FEATURES**

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**SUMMARY OF IMPROVEMENTS**

- **Data Collector/Date:** 02/17/2009
- **Appraiser/Date:** 10/01/2015
- **Neighborhood:** Neigh 2200 AV
- **TOTAL IMPROVEMENT VALUE:** 993690

**PHYSICAL CHARACTERISTICS**

**ROOFING**

- Shingle

**WALLS**

- Frame: Yes
- Brick: Yes
- Metal: Yes

**FRAMING**

- Wd Jet: 2236 1479 818
- R Conc: 1415 0 0 0

**HEATING AND AIR CONDITIONING**

- Heat: 3226 1479 424
VALUATION RECORD

Assessment Year
Reason for Change

VALUATION

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Supplemental Cards
TOTAL LAND VALUE
**IMPROVEMENT DATA**

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**SUMMARY OF IMPROVEMENTS**

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**Data Collector/Date**

bd 02/17/2009

**Appraiser/Date**

TOG 10/01/2015

**Neighborhood**

Neigh 2200 AV

**Supplemental Cards**

TOTAL IMPROVEMENT VALUE 987100
# Administration Information

**Parcel Number:** 07-4079/S

**Parent Parcel Number:** 07-4079/S

**Property Address:** LAFAYETTE PLACE 0060

**Neighborhood:** 123070 - NORTH DOWNTOWN (2)

**Property Class:** 899 - Apartments Exempt

**Jurisdiction:** 57 - Greenwich, CT

**Area:** 001

**Corporation:** 057

**District:** 07

**Section & Plat:** 167

**Routing Number:** 447780081A

**Site Description:**

**Topography:**

**Public Utilities:**

**Sewer:**

**Electric:**

**Street or Road:**

**Neighborhood:**

**Zoning:**

**R-MF Single & Multi-Family
Legal Acres:** 0.5170

---

### Ownership Information

**GREENWICH HOSPITAL**

**Lot No:** LAFAYETTE PLACE W81

**Tax ID:** 247/004

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### Transfer of Ownership

<table>
<thead>
<tr>
<th>Date</th>
<th>Owner Name</th>
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<tbody>
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### Exempt

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### Valuation Record

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<tr>
<th>Assessment Year</th>
<th>10/01/2010</th>
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### Land Data and Calculations

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<tr>
<th>Rating</th>
<th>Measured</th>
<th>Table</th>
<th>Prod. Factor</th>
<th>Base Rate</th>
<th>Adjusted Rate</th>
<th>Extended Value</th>
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**Supplemental Cards**:

**TRUE TAX VALUE**: 1013600

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**Supplemental Cards**: 1013600
EXEMPT

VALUATION RECORD

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<tr>
<th>Assessment Year</th>
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LAND DATA AND CALCULATIONS

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<th>Soil ID</th>
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<th>Prod. Factor</th>
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<td>Effective</td>
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<td>Zoning:</td>
<td>Frontage</td>
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<td>Factor</td>
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<td>R-MF Single &amp; Multi-Unit</td>
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DBA: Owch Hosp Prkg Lot @ SW corner of Lafayette Pl / Lake Ave intersection. P: 40 spcs

Supplemental Cards
TRUE TAX VALUE 979800

Supplemental Cards
TOTAL LAND VALUE 979800
### Special Features

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<th>Description</th>
<th>Value</th>
<th>ID</th>
<th>Use</th>
<th>Strv. Hgt.</th>
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<th>Year Eff. Const</th>
<th>Year Year Const</th>
<th>Base Rate</th>
<th>Features Rate</th>
<th>Adj Size</th>
<th>Computed Value</th>
<th>Phys. Obsoled Market Value</th>
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### Summary of Improvements

Data Collector/Date: 10/07/2011
Appraiser/Date: 10/01/2015
Neighborhood: NGRN 123070 AV

<table>
<thead>
<tr>
<th>Supplemental Codes</th>
<th>TOTAL IMPROVEMENT VALUE</th>
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