



THE CITY OF NEW YORK
BOROUGH OF BROOKLYN
COMMUNITY BOARD #7

Daniel A. Murphy
Chairperson

Jeremy Laufer
District Manager

Eric Adams
Borough President

November 24, 2015

Mr. Carl Weisbrod
Chairman
Department of City Planning
120 Broadway, 31st Floor
New York, New York 10271

Re: Zoning for Quality and Affordability - ULURP #N160049ZRY
Mandatory Inclusionary Housing – ULURP #N160051ZRY

Dear Chairman Weisbrod:

Community Board 7/Brooklyn voted on the Zoning for Quality and Affordability (ZQA) and Mandatory Inclusionary Housing (MIH) proposals at our Board Meeting on November 18. We had previously held a public hearing on November 9 and an information session on ZQA in the spring.

Our Board Members voted to oppose ZQA by a vote of 2 – in favor, 27 – opposed, with 5 – abstentions. Our Board Members were very skeptical of ZQA's benefits for our local community and its current residents. Many Board Members and residents spoke about our community's efforts to rezone almost all of our residential community in the 1980s, 2005 and 2009. The contextual districts that were created from these efforts had maximum heights limits, which were the main impetus for rezoning. However, our community recognized the need for trade-offs for limiting the height of most of the community and agreed to upzoning 4th and 7th Avenues. Non-mandatory inclusionary housing was included on these avenues, but to our knowledge, these resulted in zero new affordable units. We heard from many residents that these efforts would have been a wasted effort if just a few short years later we allow an additional five to twenty feet to our already limited building heights. It has been brought up that the R7A zone in Greenwood Heights was set so as to protect the view corridor from the Statue of Minerva in Green-Wood Cemetery to the Statue of Liberty. Additional height, even of just a few feet would breach the view corridor.

While much of the plan is focused on creating additional senior housing, certainly a laudable goal, our community has a younger population than NYC's average and, while we need additional senior housing, the need for family-sized units in our community is much more prevalent. Additionally, many questioned the need for bay windows, courtyards and façade articulation for affordable units as they would add to the cost of the units. It was believed that these enhancements would be limited strictly to attract renters who would pay a higher rate, not local residents.

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Much of the argument in opposition to ZQA focused on the lack of infrastructure enhancements within the plan. Our community already has severely overcrowded schools, overburdened traffic and transportation networks, water and sewer systems that have not been upgraded in decades and a significant deficit of public space, especially parks. This plan does not address these needs. If ZQA will result in new residents in our community, the population increase will further burden these systems without a plan or budget to alleviate these conditions. It would be insulting to current residents to suggest that money can be found for these problems if we agree to a change to the zoning resolution, busting limits we recently set. One should not depend on the other. This is a universal proposal that does not take the specific needs of communities into account.

Finally, many members of the public were very concerned about reducing the number of parking spaces required for new buildings and stated that the community already lacks adequate parking. It is feared additional residents without private parking options will make public parking much more difficult for all. We do not believe DCP has accurate statistics of car ownership in our community as we were informed that records were obtained from the State Department of Motor Vehicles. This does not take into account the high percentage of vehicles registered out of state. It is ludicrous to pretend these vehicles don't exist.

Our Board Members saw few tangible benefits of ZQA for the local community and even the potential for exacerbating current problems and voted overwhelmingly against the motion.

With regard to Mandatory Inclusionary Housing, our Board Members voted 15 – in favor, 11 – opposed, with 8 – abstentions. Although a plurality of members voted in favor of MIH, the proposal did not receive a majority of votes, as is required, in order to be approved by the Board. As no position received a majority vote, *we have not taken a position on this matter.*

While many of our Board Members found MIH to have laudable goals, there were again significant questions as to the benefit for the local community.

In addition to height, many were concerned that new units would not be available for local residents. Area Median Income, which includes counties outside of New York City, is more than twice CB 7's median income. Although rates may be set at 80%, 60% or even 40% of AMI, many believe these rental costs would still be too high for the local community. The idea that there would be little if any benefit for the local community was further entrenched by a lawsuit currently challenging set-asides for the local communities, which might rule such benefits unconstitutional.

The local community's median income of just under \$44,000 is less than 60% AMI proposed (for 25% of residential floor area). This would mean more than half of our population would be eligible for these units, but they would only occupy 25% of the floor area of the building. This would continue a significant deficit of affordable units locally and a suspicion that the vast majority of new units would not be built for local residents.

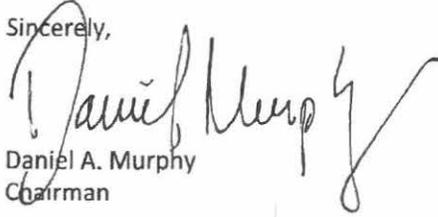
It was also discussed that affordable units could be built offsite and bunched, concentrating poverty.

Many of the arguments in opposition to both proposals can be attributed to the community's distrust of developers, a failure of the city to follow through on past promises to the community, the lack of availability to local residents, a continued overburdening of local infrastructure and distrust in the city's ability to crack down on illegal construction activities. The goals of ZQA and MIH are laudable, but the

majority of our Board Members believe that they would not achieve these goals in our community. In fact, some argued that they would further the pace of gentrification.

We hope you take our community's concerns into account as these proposals are considered.

Sincerely,



Daniel A. Murphy
Chairman



Jeremy Laufer
District Manager

cc: Elected Officials