Suydam Willoughby Development
Community District 4
Brooklyn, NY

74-533
Reduction of parking spaces to facilitate affordable housing

In all districts in the #Transit Zone#, the City Planning Commission may permit a waiver of, or a reduction in, the number of required #accessory# off-street parking spaces for #dwelling units# in a #development# or #enlargement# that includes at least 20 percent of all #dwelling units# as #income-restricted housing units# as defined in Section 12-10 (DEFINITIONS), provided the Commission finds that such waiver or reduction:

> ***(a) will facilitate such #development# or #enlargement#. Such finding shall be made upon consultation with the Department of Housing Preservation and Development;***

The proposed Willoughby Development is a new nine-story and cellar residential building at 1250 Willoughby Avenue, Block 3210, Lots 16-21 (the "Development Site"). The building would contain approximately 95 affordable dwelling units developed under the Department of Housing Preservation and Development's (HPD) "Mixed Middle Income (M2)" program. The building would contain 9 units at 40 percent of the Area Median Income ("AMI"), 9 units at 50 percent AMI, 5 units at 60 percent AMI, 29 units at 100 percent AMI, and 42 units at 130 percent AMI. The proposed unit distribution is 9 studio units (10 percent), 33 one-bedroom units (35 percent), 38 two-bedroom units (40 percent), 14 three-bedroom units (15 percent), and 1 superintendent's unit. Pursuant to the Mandatory Inclusionary Housing Program, 25 percent of the residential floor area would be set aside as permanently affordable at an average of 60 percent AMI with 10 percent at 40 percent AMI.

The proposed nine-story building would contain approximately 81,720 sq. ft. of residential floor area with an FAR of 5.5 and would be developed pursuant to Quality Housing regulations with required amenities relating to interior space, recreation areas, and landscaping. The parking requirement for the proposed building pursuant to Zoning Resolution ("ZR") § 25-23 is for 36 accessory off-street parking spaces based on the 72 non-income-restricted units.

The applicant seeks a special permit pursuant to ZR § 74-533 to waive the residential parking requirement of 36 accessory off-street spaces for the non-income-restricted units at the proposed building at the Development Site. Without the proposed special permit, the required spaces would be both prohibitively costly and would reduce the number income-restricted dwelling units. The proposed waiver in parking significantly contributes to the financial feasibility of the project. It reduces the unnecessarily high cost of providing parking in a transit-accessible affordable housing development, allowing HPD subsidies to go further toward meeting the affordable housing goals established in the City's Housing New York: A Five-Borough, Ten-Year Plan.

Approximately 81.9% of dwelling units are rented in Brooklyn Community District 4 ("CD4"). According to the NYU Furman Center's Report: State of New York City's Housing and Neighborhoods in 2018, there are approximately 31.2% severely rent-burdened households, and 46% severely rent burdened low-income households located within CD4.[1] According to the U.S. Census Bureau, American Community Survey 2011-15 Five Year Estimates for Public Use Microdata Area (PUMA) 4002 (which approximates CD4), 49.0 percent of households spend 35 percent or more of their income on rent. This is higher than the estimated 46.1 percent in Brooklyn and 44.8 percent Citywide. The proposed parking waiver would facilitate the development of housing at the Willoughby Development Site that would be affordable to low, moderate- and middle-income New Yorkers, helping to reduce the number of rent burdened households.

Housing New York identifies underutilized parking lots as an opportunity to locate new housing. It states, "[i]n developments where unused or lightly used land exists, opportunities may be found

[1] *See* NYU Furman Center, State of New York City's Housing and Neighborhoods in 2018, 55 http://furmancenter.org/files/sotc/SOC_2018_Full_2018-05-22.pdf

to locate additional housing. These areas often include sites with large and underused parking lots." This proposal is directly in line with Housing New York and the goals of the Zoning for Quality and Affordability text amendment, as the Development Site is currently used as accessory parking.

(b) will not cause traffic congestion; and

The proposed project would provide affordable housing to the neighborhood without causing traffic congestion, as the Development Site is located near public transportation and public parking lots. As discussed below, two subway stations are located less than a five-minute walk from the Project Area (Dekalb Avenue L subway station and the Jefferson Street L subway station). Based on the low vehicle availability, minimal trip generation, and accessibility to public transportation as discussed below, the Environmental Assessment Statement concluded that the proposed development would not cause traffic congestion.

The anticipated rates of automobile ownership for residents of the proposed project are minimal. According to the U.S. Census Bureau American Community Survey (ACS) 2013-2017 Five-Year Estimates, the vehicle availability is approximately 31.5 percent for households in the Census Tract for the Willoughby Development Site (Census Tract 445). This is less than the average of approximately 43 percent vehicle availability for Brooklyn. Additionally, according to the ACS 2013-2017 survey, only 9.1% of workers 16 years and over drive to work in the Census Tract. This percentage is much lower than the 22.7% of Brooklyn residents who drive to work.

In accordance with the *2014 City Environmental Quality Review Technical Manual ("CEQR Technical Manual")*, a Travel Demand Factors Memorandum was prepared and conservatively estimated the projected trips from the Reasonable Worst Case Development Scenario (RWCDS). The preliminary screening thresholds in the *CEQR Technical Manual* suggest that any project which generates 50 or more peak hour incremental vehicle trips through a single intersection in any given peak hour is likely to warrant a detailed traffic operations analysis. Conversely, projects that are anticipated to generate fewer than 50 peak hour incremental vehicle trips through a single intersection generally do not warrant detailed traffic assessments, as potential traffic impacts are not expected.

A preliminary transportation screening was performed for the proposed rezoning. The rezoning would facilitate the construction of a new residential building located at 1250 Willoughby Avenue (Lots 16, 17, 18, 19, 20, 21), and the enlargement of an existing manufacturing building at 349 Suydam Street.[2]

The RWCDS would consist of an increment of 123 residential dwelling units. The daily trip generation rates, temporal distribution, daily truck trip generation rates, truck temporal distribution, and truck directional distribution were obtained from the *CEQR Technical Manual*, Table 16-2. The modal splits were determined by American Community Survey Data, the East New York Rezoning Proposal FEIS and Census Tract data. More information regarding the specific modal splits could be found in the accompanying EAS. Census Tract 445 was conservatively used in the definition of travel demand factors.

The modal splits assumed in the Environmental Assessment Statement ("EAS") for the proposed residential use are as follows:

	Weekday	**Saturday**
Auto	13.0%	13.0%
Taxi	2.4%	2.4%
Bus	3.8%	3.8%
Subway	63.9%	63.9%
Walk	16.9%	16.9%
Total	100%	100%

[2] The ZR § 74-533 special permit is only applicable to the residential development.

Furthermore, the EAS determined the Travel Demand Forecast for vehicle trips. The results as noted in the EAS did not require additional screening, as the RWCDS would generate fewer than 50 vehicle (automobile, taxi, and truck) trips during peak hours. *See* EAS page 85. As illustrated above, the highest net increase of vehicles for Proposed Project (residential) would be 18 vehicles during the Weekday PM peak hours.

The surrounding streets providing access to the proposed development will be adequate to handle the minimal traffic generated. Streets in the surrounding area include Willoughby Avenue, a narrow 60-ft. wide one-way southbound street with one travel lane and two parking lanes, and Suydam Street, a narrow 60-ft. wide one-way northbound street with one travel lane and two parking lanes. In addition, Wyckoff Avenue to the north of the Project Area is an active commercial corridor with two travel lanes and two parking lanes. Irving Avenue to the south of the Project Area is a narrow 70-ft. wide eastbound street with one travel lane, a bike lane, and two parking lanes.

The streets are relatively safe according to Vision Zero data. According to Crash Data, there have been no fatalities within the surrounding area in 2019. Additionally, Suydam Street and Knickerbocker Avenue are both under the Vision Zero Priority Geo-Traffic Calming Studies which aims to slow traffic in the area. The traffic lights on Knickerbocker Avenue have been retimed to limit the speed of vehicles to 25 MPH.

(c) will not have undue adverse effects on residents, businesses or #community facilities# in the surrounding area, as applicable, including the availability of parking spaces for such #uses#.

The project EAS determined that, while utilization of on-street parking spaces is expected to increase due to the automobile trips generated by the proposed development, the additional parking demand would be met with available on-street parking. Specifically, the Travel Demand Forecast for inbound and outbound vehicle trips are *de minimis.* There would be a negative residential vehicle demand in the weekday AM peak hour, no demand during the weekday and Saturday midday peak hours, and a demand of 5 vehicles for the weekday PM hour. *See* EAS for a more detailed analysis. The addition of vehicles to the surrounding area is *de minimis* and would not cause undue adverse effects on the surrounding area.
The Project Area is well served by public transportation with multiple options for subway and bus service. The L train runs along Wykoff Avenue and the Project Area is located between the Jefferson Street subway station (located approximately two blocks to the west) and the DeKalb Avenue subway station (located approximately three blocks to the east). The B13, B38, and B57 bus routes also serve the area along Wyckoff, DeKalb, and Flushing avenues, respectively. The B13 bus provides limited and local service between Bushwick, Ridgewood, Glendale, Cypress Hills, and East New York. The B38 provides local and limited service between Ridgewood, Bushwick, Bedford Stuyvesant, Fort Greene and Downtown Brooklyn. The B57 bus provides local bus service between Ridgewood, Bushwick, Bedford-Stuyvesant, Williamsburg, Downtown Brooklyn, Gowanus and Red Hook.

The Proposed Project would not contain any accessory parking spaces. The absence of on-site parking would disperse site-generated private automobile trips rather than concentrating them at a single location. For this reason, the proposed waiver of parking would not contribute to serious traffic congestion and may encourage the selection of other modes of transportation instead. According to publicly available data, there are two public parking lots within a ¼ mile radius (5-minute walk) from the Development Site. There is a parking lot located at the Wyckoff Parking Lot (approximately 50 spaces) located at 343 Himrod Street, which also offers daily and monthly spots. The Wyckoff Parking Lot has an occupancy rate of approximately 68-70 percent on a typical weekday evening, with approximately 35 of the 50 of the parking spaces occupied until closing.

The Willoughby Development would be well-served by public transit and accessible by walking and bicycle from surrounding neighborhoods. It is anticipated that the majority of the residents would either walk, bike, or use public transit.

The Commission may impose appropriate conditions and safeguards to minimize adverse effects on the character of the surrounding area.