Suydam Willoughby Development
1250 Willoughby Avenue, 349-369 Suydam Street, Brooklyn
September 17, 2020

1. Introduction

Suydam, Inc. and 3210 Willoughby LLC (collectively, the "Applicants") propose a series of land use actions to rezone an existing M1-1 zoning district to an M1-5 district, a new Special Mixed-Use district, and an R6 district in the Bushwick neighborhood within Brooklyn Community District 4. The proposed rezoning area is located midblock on Block 3210 bounded by Suydam Street to the east, Willoughby Avenue to the west, Wyckoff Avenue to the north, and Irving Avenue to the south, and consists of Lots 15, 16, 17, 18, 19, 20, 21, 48, and 51 and part of Lot 1 (the "Project Area"). The following actions are proposed:

1. a text amendment of Zoning Resolution ("ZR") Article XII, Chapter 3 to create a new Special Mixed-Use ("MX-21") District pairing R7D and M1-5 zoning districts;

2. a zoning map amendment to change the existing M1-1 zoning district to:

    i. an M1-5 district within a portion of the Project Area consisting of Block 3210, Lots 48 and 51;

    ii. an MX (R7D/M1-5) District within a portion of the Project Area consisting of Block 3210, Lots 15, 16, 17, 18, 19, 20, and 21; and

    iii. an R6 zoning district within a portion of the Project Area consisting of Block 3210, part of Lot 1;

3. a text amendment of ZR Appendix F: Inclusionary Housing Designated Areas and Mandatory Inclusionary Housing Areas for Community District 4, Brooklyn to establish a Mandatory Inclusionary Housing ("MIH") Area with MIH Options 1 and 2 coterminous with the MX portion of the Project Area on Block 3210, Lots 15, 16, 17, 18, 19, 20, and 21; and

4. a special permit pursuant to ZR § 74-533 (Reduction of parking spaces to facilitate affordable housing) to waive the parking requirement of 36 accessory off-street parking spaces for the proposed residential building.

The proposed actions would facilitate (1) the development of a new affordable residential building with approximately 95 dwelling units at 1250 Willoughby Avenue (Block 3210, Lots 16, 17, 18, 19, 20, and 21) (the "Willoughby Development Site") and (2) the enlargement of an existing industrial building at 349 Suydam Street (Block 3210, Lots 48 and 51) (the "Suydam Manufacturing Enlargement Site").

2. Background

In 2018, the 1601 Dekalb Rezoning (C 180148 ZMK effective September 12, 2018) rezoned Block 3237, Lots 21, 22, 23, 27, 31, 33, 38 41, 47, and 48 from R6 and M1-1 zoning districts to R6B, R6A and R7A zoning districts to facilitate the development two buildings with approximately 122 affordable housing units.

Additionally, two significant land use studies have recently been conducted in the area. The Department of City Planning ("DCP") issued the Bushwick Neighborhood Plan Update, a draft planning framework for Bushwick, in April 2019 ("Bushwick Plan"), which generally provides for: (1) mid-block preservation, medium-density housing development along key corridors, (2) higher-density housing along transit corridors, and (3) a mix of industrial-commercial buffer zones and mixed-use zones in industrial areas. The Project Area is located within a proposed Industrial/Commercial Buffer Zone (M3), which would permit for increased density with lowered parking and loading requirements. The Project Area also adjoins a proposed Mixed-Use Area (M3/R7A) that would bring residential uses into conformance and promote continuity and growth of non-residential uses.

The second study is the North Brooklyn Industry and Innovation Plan (the "North Brooklyn Plan"), which encompasses most of the manufacturing-zoned areas to the north of the Project Area, including the North Brooklyn Industrial Business Zone ("IBZ"). In a designated "Growth District," adjacent to the Project Area, the recommendation is to encourage transit-oriented growth by increasing permitted density for commercial and industrial uses, reducing parking requirements, and modernizing loading requirements. In a designated Core Industrial Area, north of the Project Area, the recommendation is to support the retention and expansion of industrial businesses by allowing additional density for industrial uses, introducing limitations on certain non-industrial uses, and modifying parking and loading requirements.

3. Description of Surrounding Area

The proposed Project Area is located in northwestern Bushwick in Community District 4, close to the borders of Brooklyn Community District 1 (East Williamsburg) to the west and Queens Community District 5 (Ridgewood) to the north. The southern boundaries of the 900-acre North Brooklyn IBZ are located near the Project Area along Melrose, Troutman, and Starr streets. The majority of the area within 600 feet of the Project Area (the "Surrounding Area") are mapped with M1-1 and R6 zoning districts. A portion of Block 3237 to the east of the Project Area also includes a small portion of R6A, R7A, and R6B zoning districts. The M1-1 zoning district is generally mapped to the north and west of the Project Area, with the R6 zoning district mapped to the east and west. Within the M1-1 zoning district, there are industrial uses immediately adjacent to the north of the Project Area, and existing legal nonconforming two- and three-story multi-family residential buildings. Nearby industrial uses include a metal plating facility (Wilco Finishing Corporation) adjacent to the Proposed Development Site and an ice cream production facility and retail space on Suydam Street adjacent to the metal plating facility. Across the street from the Project Area (western portion of Willoughby Avenue), there are existing conforming and non-conforming three- and four-story multi-family residential buildings, open employee and truck parking for a restaurant supply warehouse, a metal products manufacturer, and three-story multi-family residential buildings. Mixed residential and commercial buildings front Wykoff Avenue from Willoughby Avenue to Dekalb Avenue. These local retail establishments include a supermarket (Key Food), a post office, a bar, and a wine store. Approximately 100 feet from the Proposed Project Area on the corner of Wykoff Avenue and Suydam Street is a four-story residential building with approximately 51 dwelling units.[1] There are two- and three- story multi-family residential buildings, commercial and office buildings, and industrial buildings within the western portion of the Surrounding Area. These uses include warehouses, parking, and local retail, such as eating and drinking establishments, a coffee shop and a yoga studio.

The R6 zoning district is mapped immediately to the south of the Project Area as well as to the south, east, and west of the Surrounding Area. This R6 zoning district consists of conforming two-, three- and four- story residential buildings. A C1-3 commercial overlay is mapped along Irving Avenue between Suydam Street and Hart Street, with local retail uses fronting Irving Avenue. Directly to the south of the Project Area within the R6 zoning district is a large four-story, 94-foot tall public elementary school, P.S. 123.

The existing zoning districts in the surrounding area include:

M1-1

The Project Area is on the edge of an M1-1 zoning district established in 1961, which extends beyond the Project Area generally to the north, west, and east. The existing M1-1 zoning district permits light industrial uses, such as woodworking shops, repair shops, wholesale service, storage facilities, limited community facility uses (houses of worship and ambulatory diagnostic facilities are permitted as-of-right), and commercial uses. Residential use is not permitted in M1-1 districts. The maximum FAR for permitted manufacturing and commercial uses within the M1-1 district is 1.0 and 2.4 for permitted community facility uses. The maximum height of a front wall can be 30 feet or 2 stories, whichever is less. There are no front yard or side yard requirements in an M1-1 zoning district. A 20-foot rear yard is required for interior lots. Building heights are governed by the sky exposure plane. In an M1-1 zoning

[1] The Board of Standards and Appeals granted a variance for Block 3221, Lot 31 (70 Wykoff Avenue), to legalize 51 dwelling units in a 66,578 square foot (3.12 FAR) building. *See* BSA Cal. No. 265-08-BZ.

district, the maximum sky exposure plane is 30 feet. Off-street parking is required for manufacturing and commercial uses, and for most uses is calculated based on the amount of floor area. In M1-1 districts, the off-street parking requirement may be waived if fewer than fifteen spaces are required.

R6 & R6/C1-3

The majority of the surrounding area is within a large R6 zoning district. Portions of the area along Wyckoff and Knickerbocker avenues are mapped with C1-3 commercial overlays. R6 districts are non-contextual zoning districts and permit all housing types at a maximum FAR of up to 2.43 and a maximum FAR of up to 4.8 for buildings containing certain community facility uses. R6 is a height factor district where residential and community facility uses are permitted with no fixed height limits and building envelopes are regulated by a sky exposure plane and open space ratio after a maximum base height of 60 feet. Residential development under the optional Quality Housing Program has a maximum FAR of 2.2 on narrow streets with a 55-foot building height limit and a maximum of 3.0 FAR on wide streets with a height limit of 70 feet. Off-street parking is required for 70 percent of the dwelling units.

C1-3 overlays mapped within the R6 zoning district permit the development of Use Group 6 commercial uses with a maximum commercial FAR of 2.0. Commercial uses must be located below residential uses in mixed buildings. The parking requirement for general retail and service uses is one accessory off-street parking space per 400 sq. ft. of commercial floor area.

R6B
An R6B zoning district was recently mapped to the east of the Project Area as part of the 1601 Dekalb Avenue Rezoning. R6B zoning districts permit residential uses with a maximum FAR of 2.0 and 2.20 within Inclusionary Housing Designated Areas ("IHDA") or MIH Areas, a minimum street wall height of 30 feet, a maximum street wall height of 40 feet, and a maximum building height of 50 feet. R6B zoning districts require off-street parking for 50% of the dwelling units in a building, with an exemption from parking for income-restricted units within the Transit Zone. The Quality Housing program is mandatory for all residential developments.

R6A
An R6A zoning district was recently mapped to the east of the Project Area as part of the 1601 Dekalb Avenue Rezoning. R6A zoning districts are medium-density contextual districts that permit residential and community facility uses. R6A districts allow a maximum FAR of 3.0 for residential and community facility uses and up to 3.6 for residential uses within MIH or IHDAs. Bulk regulations for R6A districts require a base height between 40 feet and 65 feet and have a maximum total height limit of 75 feet for Quality Housing buildings with qualifying ground floors and up to 85 feet with IHDAs. R6A zoning districts require off-street parking for 50 percent of the dwelling units in a building with an exemption from parking for income-restricted units within the Transit Zone.

R7A
An R7A zoning district was recently mapped to the east of the Project Area as part of the 1601 Dekalb Avenue Rezoning. R7A zoning districts are contextual districts that produce high lot coverage, seven- to nine-story apartment buildings set at or near the street line designed to be compatible with older buildings in medium-density neighborhoods. R7A is a contextual district that allows for new medium-density residential development with up to 4.6 FAR in IHDAs and MIH Areas. The building form requires a street wall of 40 to 75 feet, a setback above the maximum base height, and a maximum building height of up to 95 feet for Inclusionary Housing buildings with a qualifying ground floor. R7A districts require off-street parking for 50 percent of the dwelling units in a building, with an exemption from parking for income-restricted units within the Transit Zone.

Maria Hernandez Park, located one block southwest of the Project Area, is a 6.87-acre neighborhood park bounded by Irving Avenue, Suydam Street, Knickerbocker Avenue, and Starr Street. The park is an open space and recreation resource with basketball courts, playground and fitness equipment, handball courts, bathrooms, spray showers, and a dog run.

Public Transportation

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.

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.

Other Zoning Designations
As noted above, there is an MIH Area mapped to the north east of the Project Area on a portion of Block 3237 between Dekalb Avenue and Hart Street.

The Project Area is within the Transit Zone, a zoning designation for dense neighborhoods, proximate to public transit, within which no off-street parking spaces are required to be built for income-restricted housing units.

4. Description of the Proposed Project Area

The proposed Project Area consists of Block 3210, Lots 15, 16, 17, 18, 19, 20, 21, 48, 51, and part of Lot 1. The proposed Project Area is located midblock on Block 3210 bounded by Willoughby Avenue to the west, Suydam Street to the east, Wyckoff Avenue to the north, and Irving Avenue to the south. The Project Area is approximately 40,000 sq. ft. and is improved as follows:

> Block 3210, Lot 1 is a 45,000 sq. ft. lot improved with an approximately 37,620 sq. ft. (0.84 FAR) four-story (94 ft.) community facility building occupied by elementary school P.S. 123. The majority of this lot is within an R6 zoning district except for a 25-ft. wide, through-block portion that is zoned M1-1. The 5,000 sq. ft. portion is included within the rezoning area to be rezoned to R6.
>
> Block 3210, Lot 15 is a 2,500 sq. ft. lot improved with a 2,250 sq. ft. (0.9 FAR) two-story residential building with two dwelling units.
>
> Block 3210, Lots 16-21 are each 2,500 sq. ft. unimproved lots used for parking.
>
> Block 3210, Lot 48 is a 2,500 sq. ft. unimproved lot used for parking.
>
> Block 3210, Lot 51 is a 15,000 sq. ft. lot improved with a 42,528 sq. ft. (2.84 FAR) light manufacturing building with tenants that include artists and furniture makers.

5. Description of Proposed Development Sites

The Development Sites are located midblock on Block 3210 on a 32,500 sq. ft. zoning lot consisting of Lots 16-21, 48, and 51. The zoning lot is a through lot with 150 ft. of frontage on Willoughby Avenue and 175 ft. of frontage on Suydam Street. The two Development Sites are commonly owned but will be developed separately. The Applicants currently plan on developing the proposed new residential development on the Willoughby Development Site and the manufacturing enlargement on the Suydam Manufacturing Enlargement Site. Both sites are described below.

The Willoughby Development Site

The proposed Willoughby Development Site consists of Block 3210, Lots 16, 17, 18, 19, 20, and 21. It is located on a rectangular site mid-block with 150 ft. of frontage on Willoughby Avenue. The Willoughby Development Site is approximately 15,000 sq. ft. Lots 16, 17, 18, 19, 20, and 21 are vacant and used for parking and storage (independent of the building on Suydam Street).

The Suydam Manufacturing Enlargement Site

The proposed Suydam Development Site consists of Block 3210, Lots 48 and 51. It is located on a rectangular site mid-block with 175 ft. of frontage on Suydam Street. The Suydam Manufacturing Enlargement Site is approximately 17,500 sq. ft. Lot 51 is improved with a two- and four-story 42,528 sq. ft. (2.84 FAR) light manufacturing building. The building is occupied with tenants that include furniture manufacturers and artists. The Applicants anticipate that Lot 48 will remain vacant and will provide access for the tenants between the Development Sites.

6. Description of the Proposed Developments

As mentioned above, the proposed actions would both facilitate the development of a new affordable residential building at the Willoughby Development Site and would facilitate the enlargement of the existing industrial building at the Suydam Manufacturing Enlargement Site.

The Willoughby Development

The proposed Willoughby Development is a new nine-story and cellar residential building at 1250 Willoughby Avenue (Block 3210, Lots 16, 17, 18, 19, 20, and 21). The proposed building would contain approximately 81,720 square feet of residential floor area with an FAR 5.5. The proposed building has a height of 90'-0" with a base height of 90'-0" feet. The building will have a 30'-0" rear yard.

The building would contain approximately 95 affordable dwelling units developed under the HPD's "Mixed Middle Income (M2)" program, which funds the new construction of multi-family rental housing affordable to low-, moderate- and middle-income families. The building would contain nine units at 40 percent of the Area Median Income ("AMI"), nine units at 50 percent AMI, five units at 60 percent AMI, 29 units at 100 percent AMI, and 42 units at 130 percent AMI. The proposed unit distribution is nine studio units (10 percent), 33 one-bedroom units (35 percent), 38 two-bedroom units (40 percent), 14 three-bedroom units (15 percent), and one superintendent's unit.

The Applicants have selected MIH Option 1 for the proposed development, which requires affordable housing to be provided equivalent to 25 percent of the residential floor area developed at an average of 60 percent AMI with 10 percent at 40 percent AMI. The building has a height of 90 ft. with no setback. A 30-ft. rear yard is provided. The building 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 ZR § 25-23 is for 36 accessory off-street parking spaces based on the 72 non-income-restricted units. The Applicants are seeking a special permit pursuant to ZR § 74-533 to waive the residential parking requirement for the proposed building.

The Suydam Manufacturing Enlargement

The proposed Suydam Manufacturing Enlargement would enlarge the third and fourth floors and add a new fifth floor to the existing manufacturing building at 349 Suydam Street (Block 3210, Lot 51). Lot 48 would remain vacant. The proposed enlargement would add 14,052 sq. ft. of additional floor area, increasing the building's total floor area from 42,528 sq. ft. to 56,580 sq. ft. with an FAR of 3.23. The building height would increase 59 ft to 67 ft. A 20-ft. rear yard is provided for the enlarged portion of the building. No parking is required pursuant to ZR § 44-21. The proposed enlargement would permit the Applicants to preserve existing conforming uses in the building and increase the building's viability with additional space for light industrial tenants or the expansion of existing businesses within the building. While the Applicants have not yet marketed the space to potential tenants, the Applicants currently anticipate that the proposed tenants in the enlargement would be similar to the existing tenants, such as upholsterers and local artisans.

7. Actions Necessary to Facilitate the Project

The actions necessary to facilitate the project are: 1) a zoning map amendment to map R7D/M1-5

(MX-21), M1-5, and R6 zoning districts in the Project Area; 2) a text amendment to ZR Article XII, Chapter 3 to create a new MX district (MX-21) pairing R7D and M1-5 district; 3) a text amendment of ZR Appendix F to establish an MIH Area within the MX portion of the Project Area; and 4) a special permit pursuant to ZR § 74-533 to waive the residential parking requirement of 36 accessory off-street parking spaces for the proposed residential building. The Project Area consists of the two Development Sites and the M1-1 portion of Lot 1. The rezoning of Lot 1 will remove the split lot condition and will bring the existing buildings into conformance.

1. Zoning Map Amendments

The applicant proposes a zoning map amendment to rezone the Project Area from an M1-1 zoning district to an R7D/M1-5 (MX-21) zoning district, an M1-5 zoning district, and an R6 zoning district. The R7D/M1-5 (MX-21) zoning district is proposed to be mapped on the western portion of Block 3210, Lots 15, 16, 17, 18, 19, 20, and 21; the M1-5 zoning district is proposed to be mapped along the eastern portion of Block 3210, Lots 48 and 51; and the R6 zoning district is proposed to be mapped on a portion of Block 3210, Lot 1 currently zoned as M1-1. The transition from an M1-1 district to R7D/M1-5 and M1-5 districts is appropriate because it is consistent with the surrounding mixed-use context and would further area-wide planning goals of promoting mixed-use development with affordable housing and job growth on underutilized properties near transit.

Proposed R7D/M1-5 (MX-21) Zoning District

MX districts are zoning districts which permit new residential, community facility, commercial, and light industrial uses and are generally mapped in areas surrounded by industrial, commercial, and residential uses. MX districts generally pair a manufacturing district with a residential district to permit new residential and non-residential uses to be developed within the same building or located immediately adjacent to one another. Within an MX district, commercial and manufacturing uses are subject to the regulations of the applicable M1 district and residential and community facility uses are subject to the applicable residential district. MX districts restrict certain as-of-right commercial and manufacturing uses, by either prohibiting uses (such as crematoriums or almost all UG 18 uses) or limiting the location of certain Use Group 16 and 17 uses when located in a building containing Use Group 2, 3, and 4 residential and community facility uses.

The proposed R7D/M1-5 (MX-21) zoning district would be mapped along the western portion of Block 3210, beginning approximately 125 feet north of Irving Avenue for a distance approximately 175 feet (Lots 15-21). Lots 16 through 21 are unimproved lots that are currently used for parking and Lot 15 is improved with a legal non-conforming residential building. Most of the surrounding area is mapped with a medium density R6 district and the predominant land use is medium density three-to-four story multi-family homes. There are three-to-four story non-conforming multi-family homes across Willoughby Avenue from the proposed R7D/M1-5 district as well as a community facility use directly to the south. Therefore, the applicant proposes mapping a contextual medium-density residential district to ensure new development is consistent with the existing built fabric.

The proposed R7D zoning district is a medium-density contextual district that would permit residential development at a maximum FAR of 5.6 for developments with a permanent affordable housing under the MIH program. R7D zoning districts permit a maximum base height of 95’-0”, with a maximum building height of 110’-0” (115’-0” with a qualifying ground floor). The proposed R7D zoning district would match the existing built form on the southern portion of the block. According to publicly available data, the existing school located on Lot 1 is approximately 94’-0” tall fronting both Irving Avenue and Willoughby Avenue. Additionally, the Suydam Manufacturing Site is currently 59’-0” tall without a setback. The built form of the school on the southern portion of the block provides an appropriate context for the proposed R7D building height. The proposed residential use would be located directly adjacent to the existing school located on the corner of Willoughby Avenue and Irving Avenue and across from residential on the other side of Willoughby Avenue. The existing industrial uses would remain midblock. Alternatively, the MX-21 district could produce an industrial or commercial building with an FAR of 5.0.

The MX district will permit a wide variety of uses (residential, commercial, and or manufacturing uses) that would activate the site, and encourage reinvestment in underutilized lots, which would help create a vibrant development within the Surrounding Area. For the reasons set forth above, the proposed zoning districts are appropriate given the surrounding zoning, land use and built form, and policy goals.

Proposed M1-5 Zoning District

The proposed M1-5 zoning district would be mapped along the Suydam Street frontage of the Project Area, located approximately 125 feet from Irving Avenue on Lots 48 and 51. The Project Area is located at the eastern edge of a large M1-1 district that extends west into East Williamsburg and north into Maspeth, Queens. Under the North Brooklyn Plan described above, large sections of this M1 district were studied for additional density and reduced parking requirements to facilitate job growth and increased amenities near transit. Given the Project Area's proximity to transit and an active commercial corridor, Wyckoff Avenue, the applicant proposes mapping a higher density manufacturing district with lowered parking requirements that would be consistent with the surrounding area's built context and area-wide planning goals.

The proposed change from the existing M1-1 zoning district to an M1-5 district would increase the maximum FAR from 1.0 to 5.0 FAR for commercial or manufacturing use and from 2.4 to 6.5 for permitted community facility uses. New developments and enlargements within M1-5 districts are subject to a sky exposure plane that commences at a height of 85 feet above the street line (or six stories, whichever is less) with required setback at or below the 85-foot height of 15 feet on a narrow street and 20 feet on a wide street. Parking is not required in M1-5 districts. The proposed M1-5 district would be consistent with the surrounding area's built context. The increase in density would permit the expansion of the manufacturing site to the proposed 3.23 FAR with a height of 67'-0" feet, which would be similar to nearby buildings, including the existing school, adjacent to the Suydam Project Area built at approximately 4-stories, 94'-0" tall, as well as 70 Wyckoff Avenue (Block 3221, Lot 31), a four-story residential 3.2 FAR building measuring approximately 60 feet in height and located approximately 130 feet to the north of the Proposed Project Area. The proposed district would facilitate the Suydam Manufacturing Enlargement of 14,052 sq. ft. of additional floor area, increasing the building's total floor area from 42,528 to 56,580 sq. ft. with an FAR of 3.23 and building height of 59 to 67 ft.

The proposed M1-5 zoning district would permit uses consistent with the existing M1-1 zoning district, but would increase the building's capacity for new tenants by increasing the FAR and removing any parking requirements. The location of the Project Area adjacent to transit makes it an appropriate location to increase job density. The Project Area is located between the DeKalb Avenue and Jefferson Street subway stations and is accessible by three bus lines. The preservation of quality manufacturing space is in line with the City's goals to reinforce and increase job-generating uses and to enhance the vitality of industrial districts. The City is in the process of reassessing the existing M districts, in order to create suitable business environments for job growth for a range of industries. The City has released three related studies within the past two years: the North Brooklyn Plan, the Bushwick Neighborhood Plan, and New York Works. New York Works is a 2017 citywide jobs plan released by Mayor de Blasio which set a goal of spurring 100,000 new, quality jobs over the next ten years. These strategies include: (1) building on the technology economy, (2) supporting the creation of 15,000 jobs within the life sciences and healthcare sectors, (3) creating 20,000 industrial and manufacturing jobs, and (4) creating 10,000 jobs within creative and cultural sectors. Building on New York Works, the North Brooklyn Plan and the Bushwick Neighborhood Plan encourage the creation of new mid-density contextual manufacturing districts by generally raising the FAR of existing manufacturing districts from 1.0 to 3.0 to 5.0 for permitted uses in areas close to transit, permitting more building space and eliminating parking requirements.[2] The City found that low density limitations and high parking

[2] *See* Bushwick Neighborhood Plan Update, 64 available at https://www1.nyc.gov/assets/planning/download/pdf/plans-studies/bushwick-neighborhood-plan/plan/bushwick-neighborhood-plan-low-res.pdf?r=1 and the North Brooklyn Industry and Innovation Plan, page 102 available at https://www1.nyc.gov/assets/planning/download/pdf/plans-studies/north-brooklyn-vision-plan/north-brooklyn-full-low.pdf

requirements make development of new office space challenging or infeasible.[3] The City aims to facilitate the development of new commercial and industrial space for jobs by increasing allowable FAR and reducing the amount of required parking.[4]

Proposed R6 Zoning District

The proposed project would remove the existing split-lot condition on Lot 1 (currently R6 and M1-1 zoning districts) by extending the existing R6 zoning district 25 feet to encompass the entirety of Lot 1. The R6 zoning district is appropriate, as the area to the south and east of the Project Area is already zoned R6. R6 zoning districts are height factor districts that produce small multi-family buildings on small zoning lots and tall buildings that are set back from the street. The FAR ranges from 0.78 to 2.43, with a 4.8 FAR maximum for community facilities. The four-story existing school has an FAR of 0.84 and is approximately 94 ft. tall. The existing residential building on Lot 15 is a 0.9 FAR two-story residential buildings. The zoning map amendment would bring these existing buildings into conformance and compliance.

2. Zoning Text Amendment to Map a Special Mixed-Use District MX-21 (M1-5/R7D)

The Applicant proposes to amend Section 123-90 of the Zoning Resolution to establish a Special Mixed-Use District MX-21. This amendment would permit the Applicant to build a residential building at the Willoughby Development Site.

3. Zoning Text Amendment for Mandatory Inclusionary Housing

The Applicant proposes to map the Project Area as a Mandatory Inclusionary Housing area by creating a new Map 2 for Brooklyn Community District 4 in Appendix F of the Zoning Resolution. Pursuant to the MIH program, a portion of the new dwelling units in the proposed development must be affordable units. A Mandatory Inclusionary Housing Area requires affordable housing to be provided equivalent to either 25 percent of the residential floor area at an average of 60 percent of AMI with 10 percent at 40 percent AMI (Option 1) or 30 percent of the residential floor area at an average of 80 percent AMI) (Option 2). In addition to the moderate- and middle-income units provided under the HPD Mixed Middle Income (M2) program, the new permanently affordable units pursuant to the MIH would further reduce housing pressure in the area. The Community District Profile for Brooklyn Community District 4 indicates that at least 49 percent of households are considered rent burdened[5]. According to Brooklyn Community District 4's Fiscal Year 2019 Statement of Needs, affordable housing remains one of the greatest needs of the community.[6]

4. Special Permit to Reduce Parking to Facilitate Affordable Housing

The proposed special permit pursuant to ZR § 74-533 is necessary to waive the residential parking requirement 36 accessory off-street spaces for the non-income-restricted units at the proposed building at the Willoughby Development Site. Without the proposed special permit, the required spaces would need to be provided, which would be both prohibitively costly and would cause a reduction in the number of units. Furthermore, the Project Area is well served by public transportation with multiple options for subway and bus service. The proposed waiver of 36 parking spaces would facilitate the creation of income-restricted housing units by allowing the proposed development to concentrate available financial resources on the production of affordable housing rather than parking. The proposed waiver in parking significantly contributes to the financial feasibility of the project.

Collectively, the proposed land use actions would facilitate the development of a new affordable residential building with approximately 95 units at the Willoughby Development Site and the enlargement of an existing industrial building at the Suydam Manufacturing Enlargement Site. These proposed actions represent a unique opportunity to pioneer transit-oriented, mixed-use

[3] *See* North Brooklyn Plan, 99.
[4] *Id.* At 100
[5] *See* NYC Planning Community District Profiles: Brooklyn Community District 4, *available at* https://communityprofiles.planning.nyc.gov/brooklyn/4
[6] *See* Brooklyn Community District 4: Statements of Community District Needs and Community Board Budget Requests: Fiscal Year 2019. *Available at* https://docs.google.com/viewer?url=https://github.com/NYCPlanning/labs-cd-needs-statements/raw/master//BK%20DNS%20FY%202019/FY2019_Statement_BK04.pdf

development of both affordable housing and job-generating space, that is appropriate for the surrounding neighborhood and consistent with community and citywide goals. The proposed actions would encourage investment in the neighborhood and promote opportunities for workers to live in the vicinity of new jobs. The proposed actions will enhance the vitality and character of the neighborhood.

8. Conclusion

As stated above, the Applicant proposes a text amendment to create a new MX (R7D/M1-5) district pairing R7D and M1-5 districts, a zoning map amendment to map MX (R7D/M1-5), M1-5, and R6 zoning districts in the Project Area, a text amendment of ZR Appendix F to establish an MIH Area within the MX portion of the Project Area, and a special permit pursuant to ZR § 74-533 to waive the residential parking requirement of 36 accessory off-street parking spaces for the proposed residential building. The proposed actions would facilitate the development of 95 units of affordable rental housing while preserving and adding additional manufacturing uses.