February 8, 2016

Hon. Laurie A. Cumbo  
Member of the New York City Council  
1 Hanson Place, Suite 201  
Brooklyn, NY 11243

Dear Councilmember Cumbo,

Brooklyn Community Board 9 asks that you vote no on the ZQA and MIH text amendments. In our November 24, 2015 general meeting, Community Board 9 overwhelmingly voted against the proposed Mandatory Inclusionary Housing “MIH” and Zoning for Quality and Affordability “ZQA” text amendments.

The text amendments were first presented to Community Board 9 in the spring of 2015 and they were referred to our ULURP committee for consideration. The committee spent countless hours analyzing the proposals, submitted questions to City Planning, engaged the Brooklyn Borough President’s office, and also held several meetings to solicit input from the community. After considerable deliberation, the final recommendation of the committee was to reject the text amendments. The full board agreed and voted no on both proposals.

One of the main reasons for rejecting the amendments was that the district is already one of the most densely populated in the city and that the MIH/ZQA amendments would serve to encourage additional development that would add to the density without doing enough to protect affordability.

Trade-offs would exist where currently affordable housing stock is replaced with newer developments at market-rate combined with more expensive affordable units. Even with the provisions in the amendments, there would be a net loss of affordable housing units, ultimately decreasing affordability as it is currently defined in the district.

It’s important to note that the definition of affordable under current regulations is very different from the rates renters would pay under the proposed AMI guidelines. The new affordable rates will be more expensive, resulting in displacement of citizens that can only afford to pay the existing rates. Hence, the common phrase "affordable for who?"
The need in Community District 9 is for an expanded focus on protecting affordability and preservation of the neighborhood characteristics through zoning. These areas are not adequately addressed by the text amendments.

Additionally, parking is already a significant concern in the district and the relaxing of parking requirements for new developments would serve to exacerbate the issue. Reducing parking will place additional burdens on already strained local public transportation.

Community Board 9 had considered offering modifications/suggestions to the amendments but that was rejected that as well. The concern is that it will probably do more harm than good to pass a “patch-work” of modifications. A housing plan needs to be comprehensive and its components need to work together to offer the necessary protections and truly address community needs.

What is required FIRST is a meaningful dialogue to fully understand those needs and from there we can craft a plan that addresses those concerns. We ask that you support your constituents and reject the text amendments and begin the process of direct community engagement.

Thank you for listening.

Respectfully submitted,

[Signature]

Demetrius S. Lawrence
Chairman
February 8, 2016

Hon. Darlene Mealy
Member of the New York City Council
1757 Union Street, Second Floor
Brooklyn, NY 11213

Dear Councilmember Mealy,

Brooklyn Community Board 9 asks that you vote no on the ZQA and MIH text amendments. In our November 24, 2015 general meeting, Community Board 9 overwhelmingly voted against the proposed Mandatory Inclusionary Housing “MIH” and Zoning for Quality and Affordability “ZQA” text amendments.

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Respectfully submitted,

Demetrius S. Lawrence
Chairman
February 8, 2016

Hon. Mathieu Eugene  
Member of the New York City Council  
123 Linden Boulevard  
Brooklyn, NY 11226

Dear Councilmember Eugene,

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Respectfully submitted,

Demetrius S. Lawrence
Chairman