

Brooklyn Borough President Recommendation

CITY PLANNING COMMISSION

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INSTRUCTIONS

1. Return this completed form with any attachments to the Calendar Information Office, City Planning Commission, Room 2E at the above address.
2. Send one copy with any attachments to the applicant's representatives as indicated on the Notice of Certification.

APPLICATION#: 776-780 MYRTLE AVENUE (UDAAP) – 190353 HAK

An application submitted by the New York City Department of Housing Preservation and Development (HPD) for the following land use actions: Pursuant to Article 16 of the General Municipal Law of New York State, requesting designation of the property, located at 776-780 Myrtle Avenue (Block 1754, Lots 19, 20, & 22) as an Urban Development Action Area (UDAA) and an Urban Development Action Area Project (UDAAP) for such area, and pursuant to Section 197-c of the NYC Charter for the disposition of such properties located at 778-780 Myrtle Avenue (Block 1754, Lots 20 & 22) to a developer to be selected by HPD to facilitate a mixed-use development containing approximately 59 affordable housing units, commercial and community facility space, Borough of Brooklyn, Community District 3 (CD 3).

BROOKLYN COMMUNITY DISTRICT NO. 3

BOROUGH OF BROOKLYN

RECOMMENDATION

APPROVE
 APPROVE WITH
MODIFICATIONS/CONDITIONS

DISAPPROVE
 DISAPPROVE WITH
MODIFICATIONS/CONDITIONS

SEE ATTACHED

Eric L. Adams

July 15, 2019

BROOKLYN BOROUGH PRESIDENT

DATE

RECOMMENDATION FOR: 776-780 MYRTLE AVENUE (UDAAP) – 190353 HAK

The New York City Department of Housing Preservation and Development (HPD) submitted an application for the following land use actions: Pursuant to Article 16 of the General Municipal Law of New York State, requesting designation of the property, located at 776-780 Myrtle Avenue (Block 1754, Lots 19, 20, and 22) as an Urban Development Action Area (UDAA) and an Urban Development Action Area Project (UDAAP) for such area, and pursuant to Section 197-c of the New York City Charter for the disposition of such properties located at 778-780 Myrtle Avenue (Block 1754, Lots 20 and 22) to a developer to be selected by HPD to facilitate a mixed-use development containing approximately 59 affordable and supportive housing units, as well as commercial and community facility space, in Brooklyn Community District 3 (CD 3).

On May 29, 2019, Brooklyn Borough President Eric L. Adams held a public hearing on this disposition request. There were no speakers on the item.

In response to Borough President Adams' inquiry regarding the qualifying income range for prospective tenants for both the low-income and the supportive housing units, the anticipated rents for each unit type, and how long these units are required to be rented at affordable rates, the applicant expressed that all 23 of the affordable housing units are underwritten to 57 percent of Area Median Income (AMI). The affordable housing component would include nine studios, eight one-bedrooms, and six two-bedrooms. Studios would be rented at \$843 per month, with a qualifying income range of \$31,303 to \$36,537. One-bedroom units would be rented at \$1,065 per month, with a qualifying income range of \$39,086 to \$45,629, and two-bedroom units would be rented at \$1,290 per month, with a qualifying income range of \$46,937 to \$54,777. The developer would explore income averaging as a means to provide more deeply affordable units at lower AMIs.

In response to Borough President Adams' inquiry as to what supportive services would be provided onsite and whether such services would be available solely to the supportive housing residents, or the rest of the building's residents, and/or the community at large, the applicant stated that Pratt Area Community Council d/b/a IMPACCT Brooklyn would seek to replicate the comprehensive case management services they provide at other facilities, and encourage resident engagement in these programs.

In response to Borough President Adams' inquiry as to whether one of the community's affordable housing administering agents would be used in the tenant selection process in order to ensure the highest level of participation from CD 3, and whether the applicant's marketing strategy would include a financial literacy campaign to assist local residents in becoming lottery-eligible, the applicant noted that IMPACCT Brooklyn is an HPD Housing Ambassador and part of the agency's Ready to Rent program, which provides free financial counseling and assistance with applications to the City's affordable housing lotteries. The applicant confirmed that IMPACCT Brooklyn would manage the affordable housing lottery at 776-780 Myrtle Avenue, with outreach to community organizations and residents throughout the district.

In response to Borough President Adams' inquiry as to what consideration has been given to providing affordable retail or community facility space for local arts and cultural non-profit organizations, the applicant disclosed that IMPACCT Brooklyn has reached out to elected officials for feedback on what types of goods and services are needed along this section of Myrtle Avenue. The applicant is currently considering a coffee shop or community kitchen as a potential use for the commercial ground floor and would look to hire local residents to operate such space. The applicant also stated that IMPACCT Brooklyn operates other buildings outside CD 3, where they lease commercial space to small businesses at below-market rents:

In response to Borough President Adams' inquiry regarding the incorporation of sustainable features such as blue, green, or white roof coverings, passive house design, permeable pavers, New York City Department of Environmental Protection (DEP) rain gardens, and/or solar panels, the applicant stated that the development would have a white roof, consistent with HPD Enterprise Green Communities requirements. IMPACCT Brooklyn would strive to incorporate passive house elements in the design and have rain gardens integrated with street trees in front of the building.

Consideration

CB 3 approved this application on May 6, 2019.

The proposed land use action would affect a site located in an R7D zoning district with a C2-4 commercial overlay. The site consists of three tax lots on a block bounded by Marcy, Myrtle, Nostrand, and Vernon avenues. The lots were identified as a development site in the Bedford-Stuyvesant I Urban Renewal Plan, which expired in 2008.

The site contains approximately 7,500 square feet (sq. ft.) of vacant, City-owned land with 75 feet of frontage on Myrtle Avenue. The requested UDAAP designation and disposition action would result in a nine-story building with 59 affordable and supportive housing units, and a commercial space of approximately 3,165 sq. ft. on the ground floor. Sixty percent of the floor area, consisting of 36 studios, would be reserved for formerly homeless individuals aged 55 and older, while the remaining 40 percent, consisting of 23 affordable housing units, would be targeted to households at up to 60 percent AMI.

The designated developer for this property is IMPACCT Brooklyn, a non-profit affordable housing organization with a significant presence in Bedford-Stuyvesant, Clinton Hill, Crown Heights, Fort Greene, and Prospect Heights.

The surrounding context is primarily residential, with multifamily homes ranging from one to four stories, and apartment buildings ranging from six to nine stories. The New York City Housing Authority (NYCHA) Marcy Houses complex, with 28 buildings on two sites, is located directly across Myrtle Avenue. Open space resources include Marcy Playground, as well as Stockton and Willoughby playgrounds, located east of Marcy Avenue. West of Nostrand Avenue, the area is primarily commercial and industrial with multiple manufacturing zoning districts mapped between Flushing and Willoughby avenues.

Brooklyn is one of the fastest growing communities in the New York metropolitan area and the ongoing Brooklyn renaissance has ushered in extraordinary changes that were virtually unimaginable even a decade ago. Unfortunately, Brooklyn's success has led to the displacement of longtime residents who can no longer afford to live in their own neighborhoods. Borough President Adams is committed to addressing the borough's affordable housing crisis through creation and preservation of much-needed affordable housing units for very low- to middle-income Brooklynites.

Moreover, in Bedford-Stuyvesant and across New York City, there is a pressing need for affordable and stable housing, among elderly adults, first-time homebuyers, homeless households, low-income families, single college graduates, and those with special needs. Increasing the supply of affordable apartments for a range of incomes and household types in mixed-use buildings is a critical strategy for promoting a sustainable neighborhood and city.

Borough President Adams believes that there is a need for supportive housing options for individuals and families who are circumstantially homeless, including persons with disabilities. Considering this section of Brooklyn has a great share of homeless shelters and transitional housing, Borough President Adams believes the City should amend the costly and cumbersome shelter system to a more cost-

effective model that prioritizes permanent housing solutions. Producing supportive housing is less expensive and provides stable housing stock to serve the homeless population, while also integrating residents into the community. As more permanent units become available, steps should be taken to reduce the capacity of area shelters as accommodations in this community.

Borough President Adams supports the public policy of integrating supportive housing units into a community by interspersing such units in the same building with housing units for low-income families, with a blend of 40 percent of occupants being families typically earning up to 60 percent AMI. This proposal is generally consistent with recent City policy changes that have evolved to blend such supportive housing developments with 40 percent of the apartments designated for low-income households. Tenants are assigned to such apartments through the City's affordable housing lottery, inclusive of a 50 percent local preference, for occupants earning up to 60 percent AMI. As an HPD Housing Ambassador, IMPACCT Brooklyn would ensure capable administration for the tenancing of such permanent housing accommodations.

In areas where new developments can be realized on City-owned sites, Borough President Adams supports the disposition of such sites being developed for affordable housing to remain permanently affordable as a means to minimize the loss of this stock. Where HPD has designated for-profit companies to develop affordable housing, the duration of such is often driven by financial considerations. Standard regulatory agreements used by government agencies might consist of 30 to 50 years. As tenants move out after the expiration of such regulatory agreements, those units would no longer be an affordable housing resource. The disposition of the 776-780 Myrtle Avenue property to a mission-based housing developer that has agreed to enter into a 60-year regulatory agreement with HPD would ensure that all 59 units remain affordable much longer than comparable developments.

It is Borough President Adams' policy to advocate for mission-driven affordable housing non-profits to play a role in such developments as they would then be likely to remain permanently affordable. Such organizations are equipped to maximize community participation in affordable housing opportunities, and serve as non-profit administering agents for affordable housing lotteries.

As the affordable housing non-profit, IMPACCT Brooklyn would enter into a regulatory agreement with HPD governing the project's affordable housing plan. The organization would be charged with ensuring that all units at 776-780 Myrtle Avenue comply with the regulatory agreement. This may involve verifying a prospective tenant household's qualifying income, and approving the rents of affordable housing units. IMPACCT Brooklyn would attest to HPD that the initial lease-up of the affordable housing units is consistent with the income requirements, and follow up to ensure compliance.

IMPACCT Brooklyn has a proven track record of successfully marketing affordable housing units, as well as promoting affordable housing lottery readiness through educational initiatives. As such, the non-profit would be expected to provide free financial counseling and technical assistance to residents who wish to apply for affordable housing at 776-780 Myrtle Avenue.

Because of the proposed development's location in a New York City Zoning Resolution (ZR) Transit Corridor, the project would not provide accessory off-street parking for residents. The Myrtle-Willoughby stop of the Brooklyn-Queens Crosstown Local G train is located at the end of the block. The site is also served by the B44 and B54 buses. There are two Citi Bike docking stations adjacent to Marcy Playground, across Myrtle Avenue. In addition to existing bicycle access options, the development would provide enclosed storage for 30 bicycles.

Borough President Adams is concerned that too many Brooklyn residents are currently unemployed or underemployed. It is his policy to promote economic development that creates more employment opportunities. According to the Furman Center's "State of New York City's Housing and Neighborhoods

in 2015," double-digit unemployment remains a pervasive reality for several of Brooklyn's neighborhoods, with more than half of the borough's community districts experiencing poverty rates of nearly 25 percent or greater. Prioritizing local hiring would assist in addressing this employment crisis.

Additionally, promoting Brooklyn-based businesses, including those that qualify as locally-based enterprises (LBEs) and minority- and women-owned business enterprises (MWBEs), is central to Borough President Adams' economic development agenda. This site provides opportunities for the developer to retain a Brooklyn-based contractor and subcontractor, especially those who are designated LBEs consistent with Section 6-108.1 of the City's Administrative Code, and MWBEs that meet or exceed standards per Local Law 1 (no less than 20 percent participation).

As 776-780 Myrtle Avenue funding includes financing for which HPD contributes no less than \$2 million, IMPACCT Brooklyn would be required to participate in HPD's MWBE Building Opportunity Initiative's Build Up program, and meet the State's additional labor participation requirements. Borough President Adams believes that, based on the Build Up program and State requirements, there would be reasonable opportunities to address demonstrated disparities in LBE/MWBE participation in the affordable housing development process. Development projects that receive HPD subsidies are required to spend at least one-quarter of HPD-supported costs on certified MWBEs during the course of design and construction. Developers may adopt a goal higher than the minimum.

Through HPD's initiative, Borough President Adams believes that the project developer should continue the emphasis to retain Brooklyn-based contractors and subcontractors, especially those who are designated LBEs, consistent with Section 6-108.1 of the City's Administrative Code, and LBE and MWBE establishments, as a means to meet or exceed standards per Local Law 1 (no fewer than 20 percent participation).

Borough President Adams supports the proposed development. He calls on HPD and IMPACCT Brooklyn to maximize community participation to obtain the affordable housing units; provide more deeply affordable housing units, including for seniors at 30, 40, and 50 percent AMI; offer commercial space to local cultural groups at below-market rents, and incorporate resilient and sustainable energy and stormwater practices in the development.

Providing More Deeply-Affordable Housing Units, Including Housing for Senior Citizens

Achieving Deeper Affordability for More Apartments

The non-supportive affordable housing units at 776-780 Myrtle Avenue would be targeted to households at 60 percent AMI. Given that 31 percent of CD 3 residents are considered rent-burdened, Borough President Adams is concerned that the proposed development would not provide an opportunity for Bedford-Stuyvesant households with earnings that are less than what is required to qualify for the affordable housing lottery based on the intended 60 percent AMI. Even with local preference intended for at least 50 percent of the units, too few Bedford-Stuyvesant residents in need of affordable housing would not qualify for these apartments.

Borough President Adams believes that, in order to provide more opportunities for residents of CD 3, and to strive to achieve and perhaps exceed the 50 percent local preference mark, some units should be set aside for households that would qualify for income tiers based on 30, 40, and 50 percent AMI. However, he realizes that reducing the rent roll does not result in a financially viable affordable housing development. Therefore, in order to balance the goals of the project and make it more affordable to households of Bedford-Stuyvesant while maintaining financial viability, a percentage of the units would need to be targeted to low-income households earning up to 70 and 80 percent AMI, to offset the resulting reduced rent roll based on incorporating a number of units with rents at 30, 40, and 50 percent AMI.

In March 2018, Congress modified the Low-Income Housing Tax Credit (LIHTC) program to allow income averaging. Under the rules, developers utilizing the credit may target households at up to 80 percent AMI in order to offset lower rents for low-income households, provided that the average income/rent limit in the project does not exceed 60 percent AMI. As an additional requirement, at least 40 percent of the units in an LIHTC project must have an average income level of no more than 60 percent AMI and the rents for these units must not exceed 30 percent of the qualifying income level.

Borough President Adams believes that income averaging presents an opportunity to achieve a greater number of affordable units for households with earnings not exceeding 50 percent AMI. Therefore, in order to provide for more units at lower AMIs, the City Council should obtain commitments in writing from HPD clarifying how its LDA with IMPACCT Brooklyn would memorialize the extent of inclusion of non-supportive, affordable housing units at 30, 40, and 50 percent AMI.

Targeting Deeper Affordability for Smaller Units to Senior Citizen Households

Another rationale for increasing the number of units at 30, 40, and 50 percent AMI is the pressing need to provide affordable housing for an aging population with limited financial means. Older New Yorkers are a rapidly growing segment of the city's population, with more than 300,000 seniors residing in Brooklyn. As noted in the New York City Department of City Planning (DCP)'s Zoning for Quality and Affordability (ZQA) study, New York's senior population is expected to grow 40 percent by 2040. The study noted that lotteries conducted by HPD for senior housing developments drew 60 applicants for every senior apartment. According to a recent study by LiveOn NY, there are 200,000 New Yorkers aged 62 and older on the City's affordable housing waiting lists, while the average wait for a senior apartment is seven years.

Providing opportunities for seniors to secure quality affordable housing and remain in their communities is a priority for Borough President Adams. In an era in which the Federal government has moved away from funding affordable housing for seniors, too few affordable apartments for seniors are being produced, leaving tremendous demand for age-based affordable housing in Brooklyn. As a result, many elderly households are experiencing an increased rent burden to remain in their homes, exhausting their life savings just to keep up with day-to-day living until they are unable to remain in the areas where they have lived for many years.

While Borough President Adams typically seeks a 50/50 blend of studios, one-bedroom, two-bedroom, and three-bedroom units, he believes that when studio and one-bedroom apartments are rented at or below 40 percent AMI, such apartments might be more affordable to senior households. Given the proposed number of studio and one-bedroom units at 776-780 Myrtle Avenue, Borough President Adams believes that there are significant opportunities to provide affordable housing for seniors, including those who are formerly homeless.

With regard to supportive housing-funded projects, HPD is not bound to standard requirements to distribute bedroom types evenly among income tiers. With the income averaging flexibility afforded to LIHTC projects, HPD would have extensive latitude to earmark a portion of the nine studios and eight one-bedroom units at primarily 40 percent AMI and some at 50 percent AMI. This would result in more affordable rents for seniors living on modest pensions and Social Security income. It is reasonable to assume that with such set-asides, and a targeted marketing campaign, a greater share of studio and one-bedroom apartments at 776-780 Myrtle Avenue would be awarded to senior households.

Therefore, in order to accommodate senior citizen households, the City Council should obtain commitments, in writing, from HPD clarifying how its LDA with IMPACCT Brooklyn would memorialize how it would assist seniors households, including those who are formerly homeless, being eligible to apply for studio and one-bedroom units at 30, 40, and 50 percent AMI.

Maximizing Community Participation of the Supportive Housing Units

Both the affordable and the supportive housing units at 776-780 Myrtle Avenue will be filled by IMPACCT Brooklyn. The organization would administer the affordable housing lottery and also act as the provider of social services for the supportive housing tenants. Typically, such tenants are located in the homeless shelter system, assessed by professional staff, and then selected by the landlord. Borough President Adams believes that in addition to utilizing the affordable apartments at 776-780 Myrtle Avenue to help Bedford-Stuyvesant residents remain in the neighborhood, it should be public policy to utilize the supportive units (to the extent practical) as a permanent housing resource for those living in the shelter system or transitional housing, including both current and former residents of CD 3. To achieve this goal, Borough President Adams believes that IMPACCT Brooklyn should go beyond standard operating procedures to identify potential tenants among those now seeking refuge in homeless shelters and transitional housing facilities within CD 3 and/or those in such facilities outside of CD 3, who previously resided in the community district.

Borough President Adams believes that, prior to considering the application, the City Council should obtain commitments, in writing, from HPD clarifying how its land disposition agreement (LDA) with IMPACCT Brooklyn will identify (to the extent practical) supportive housing tenants among persons currently or previously residing in CD 3.

Set Aside Portion of Commercial Space for Local Cultural Entities

Borough President Adams believes that development on City-owned land should seek to maximize public benefit such as affordable housing. He also recognizes that, like residents, local businesses and cultural organizations benefit from affordable rents that allow them to remain in the community.

It is one of Borough President Adams' policies to assist community-based non-profit organizations with securing affordable space. These organizations play an important role in the neighborhoods they serve, though it is too often a challenge to secure sufficient affordable space to grow and maintain their operations. Many cultural organizations have contacted Borough President Adams seeking assistance in securing space to expand and sustain their programming. In response to those concerns, Borough President Adams' policy is to review discretionary land use actions for their appropriateness to promote cultural activities.

In June 2016, Borough President Adams released "All the Right Moves: Advancing Dance and the Arts in Brooklyn," a report examining the challenges facing artists in the borough, along with accompanying recommendations. The report highlighted the benefits of arts and dance, including maintaining physical fitness and enjoying creative self-expression, as well as contributions to the vibrant culture of Brooklyn. Borough President Adams finds many challenges facing the local arts community, such as an absence of diversity — fewer than half of the individuals working in dance in Brooklyn are people of color based on 2000 United States Census data. Additionally, funding for the arts has decreased dramatically in New York City in recent years, including by 37 percent from the New York State Council of the Arts (NYSCA), 15 percent from the National Endowment for the Arts (NEA), and 16 percent from the New York City Department of Cultural Affairs (DCLA).

Data show that such cultural activities create a variety of positive contributions, including combating the borough's high rate of obesity — as of 2016, 61 percent of adults are overweight or obese, according to the New York State Department of Health (NYSDOH) — and helping children succeed in school, a finding supported by research released by the Citizens' Committee for Children of New York, Inc. Demand for cultural programs continues to grow across Brooklyn. A 2015 report from the Center for an Urban Future found a 20 percent increase in attendance at events organized by local cultural institutions since 2006.

Borough President Adams believes that the location of the proposed development is well-suited for inclusion of cultural and community activities. The presence of such uses at 776-780 Myrtle Avenue would benefit both the building's tenants and residents of Marcy Houses, across from the development.

As proposed, 776-780 Myrtle Avenue would contain approximately 3,165 sq. ft. of commercial floor area. Borough President Adams believes that a portion of such space could be marketed to local arts or cultural groups, and/or locally-based community organizations. However, he is aware that such uses cannot afford to compete with the rent that retail uses would likely pay to lease at this location.

Therefore, prior to considering the application, the City Council should obtain commitments, in writing, from IMPACCT Brooklyn, clarifying how it would memorialize the extent that it would set aside a portion of the commercial space for local non-profit organizations such as arts and/or cultural entities at below-market lease terms, as warranted.

To the extent that the City Council seeks to provide below-market rents to accommodate such arts and/or cultural organizations, IMPACCT Brooklyn should actively solicit such organizations, based on reasonable lease terms, as determined in consultation with CB 3 and local elected officials.

Advancing Resilient and Sustainable Energy and Stormwater Management Policies

It is Borough President Adams' sustainable energy policy to promote opportunities that utilize blue/green/white roofs, solar panels, and/or wind turbines, as well as passive house construction. He encourages developers to coordinate with the New York City Mayor's Office of Sustainability, NYSERDA, and/or the New York Power Authority (NYPA) at each project site. Such modifications tend to increase energy efficiency and reduce a development's carbon footprint. Development at 776-780 Myrtle Avenue offers opportunities to explore resiliency and sustainability measures such as incorporating blue/green/white roof finishes, passive house construction principles, and solar panels in the development.

Furthermore, as part of his flood resiliency policy, Borough President Adams also encourages developers to introduce best practices to manage stormwater runoff such as incorporating permeable pavers and/or establishing rain gardens that advance DEP green infrastructure strategy. Borough President Adams believes that sidewalks with nominal landscaping and/or adjacent roadway surfaces are potential resources that could be transformed through the incorporation of rain gardens, which provide tangible environmental benefits through rainwater collection, improved air quality, and streetscape beautification. Tree plantings can be consolidated with rain gardens as part of a more comprehensive green infrastructure strategy. In addition, blue/green roofs, permeable pavers, and rain gardens would divert stormwater from the City's water pollution control plants.

According to the "NYC Green Infrastructure 2017 Annual Report," green infrastructure plays a role in addressing water quality challenges and provides numerous economic, environmental, and social benefits. The required Builders Pavement Plan provides an opportunity to incorporate a rain garden in front of the 776-780 Myrtle Avenue site. Such installation could help advance DEP stormwater strategies, enhancing the operation of the Newtown Creek Wastewater Treatment Plant during wet weather. In addition to compensating for the loss of a large permeable surface, the installation of a rain garden would provide a significant streetscape improvement on Myrtle Avenue.

Borough President Adams believes it is appropriate for IMPACCT Brooklyn to engage government agencies, such as the Mayor's Office of Sustainability, NYSERDA, and/or NYPA, to give consideration to government grants and programs that might offset costs associated with enhancing the resiliency and sustainability of this development site. One such program is the City's Green Roof Tax Abatement (GRTA), which provides a reduction of City property taxes by \$4.50 per square foot of green roof, up to \$100,000. The DEP Office of Green Infrastructure advises property owners and their design

professionals through the GRTA application process. Borough President Adams encourages the developer to reach out to his office for any help in opening dialogue with the aforementioned agencies and further coordination on this matter.

Borough President Adams believes that HPD should codify in the LDA or regulatory agreement with IMPACCT Brooklyn to memorialize exploration of additional resiliency and sustainability measures such as incorporating blue/green/white roof treatments, DEP rain gardens, passive house construction principles, and solar panels in the development. The City Council should further seek demonstration of IMPACCT Brooklyn's commitment to coordinate with DEP, the New York City Department of Transportation (DOT), and the New York City Department of Parks and Recreation (NYC Parks) regarding the installation of DEP rain gardens as part of a Builders Pavement Plan, in consultation with CB 3 and local elected officials.

Recommendation

Be it resolved that the Brooklyn borough president, pursuant to Sections 197-c and 201 of the New York City Charter, recommends that the City Planning Commission (CPC) and City Council approve this application with the following conditions:

1. That the New York City Department of Housing Preservation and Development (HPD) incorporate in its Land Disposition Agreement (LDA) or Regulatory Agreement with IMPACCT Brooklyn the extent that the developer would:
 - a. Memorialize the extent of inclusion of non-supportive, affordable housing units at 30, 40, and 50 percent AMI
 - b. Memorialize strategies to target eligibility and outreach to seniors, including those who are formerly homeless, for studio and one-bedroom units with rents based on 30, 40, and 50 percent of Area Median Income (AMI)
 - c. Memorialize intent to identify (to the extent practical) potential tenants among those now housed in shelters and/or transitional housing in Brooklyn Community District 3 (CD 3) or former residents of the district
 - d. Set aside a portion of the commercial space for one or more local non-profit organizations such as arts and/or cultural entities at below-market lease terms, as warranted
 - e. Continue exploration of additional resiliency and sustainability measures such as incorporating blue/green/white roof treatment, passive house construction principles, rain gardens, and solar panels in the development
2. A demonstration of IMPACCT Brooklyn's commitment to coordinate with the New York City Department of Environmental Protection (DEP), New York City Department of Transportation (DOT), and the New York City Department of Parks and Recreation (NYC Parks) regarding the installation of expanded tree pits and DEP rain gardens as part of the Builders Pavement Plan, in consultation with Community Board 3 (CB 3) and local elected officials