

## **A. INTRODUCTION AND BACKGROUND**

Executive Order 12898 (EO 12989) requires federal agencies to consider whether actions they might fund or approve may have any disproportionately high and adverse environmental or human health effects on low-income or minority populations. Implementation of the proposed Lambert Houses project would require approval from the U.S. Department of Housing and Urban Development (HUD) of the reassignment of project-based rental assistance contracts (and possibly HOME or other funding from HUD) and is therefore subject to review under the National Environmental Policy Act (NEPA). Thus, this environmental justice analysis has been prepared to assess the proposed project's potential for disproportionately high and adverse effects on minority and low-income populations following the guidance and methodologies outlined in the Council on Environmental Quality's (CEQ) *Environmental Justice Guidance under the National Environmental Policy Act* (December 1997). This environmental justice analysis also complies with HUD regulations found at 24 CFR Parts 50 and 58, which mandate compliance with EO 12898 for HUD and/or HUD applicants.

EO 12898 requires "each Federal Agency [to] make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations." Moreover, CEQ's guidance requires that "[a]gencies should recognize that the impacts within minority populations, low-income populations, or Indian tribes may be different from impacts on the general population due to a community's distinct cultural practices." EO 12898 also requires federal agencies to work to ensure greater public participation by low-income and minority populations in the decision-making process. For the proposed project, this requirement has been satisfied by the public review process for this Environmental Impact Statement (EIS) mandated by the State Environmental Quality Review (SEQR) [June 26, 1991], and NEPA.

This chapter analyzes the proposed project's potential effects on minority and low-income populations, to determine if disproportionately high and adverse effects on those populations would result. As detailed in this analysis, the proposed project is not expected to result in any disproportionately high and adverse effects on minority and low-income populations. The proposed project would be in compliance with all applicable NEPA and HUD regulations related to environmental justice protections.

## **B. METHODOLOGY**

The environmental justice analysis for the proposed project follows the guidance and methodologies recommended in the federal CEQ's *Environmental Justice Guidance under the National Environmental Policy Act* (December 1997), as summarized below.

## CEQ GUIDANCE

The CEQ, which has oversight of the federal government's compliance with EO 12898 and NEPA, developed its guidance to assist federal agencies with their NEPA procedures so that environmental justice concerns are effectively identified and addressed.

The CEQ methodology involves collecting demographic information on the area where the project may cause significant adverse effects; identifying low-income and minority populations in that area using census data; and identifying whether the project's adverse effects are disproportionately high on the low-income and minority populations in comparison with those on other populations. Mitigation measures should be developed and implemented for any disproportionately high and adverse effects. Under NEPA, the potential for disproportionately high and adverse effects on minority and/or low income populations should then be one of the factors the federal agency considers in making its finding on a project and issuing a Record of Decision.

## METHODOLOGY USED FOR THIS ASSESSMENT

The assessment of environmental justice for the proposed project is based on CEQ guidance, as described above. It involves four basic steps:

1. Identify the area where the project may cause significant and adverse effects (i.e., the study area);
2. Compile race and ethnicity and poverty status data for the study area and identify minority or low-income communities;
3. Identify the proposed project's potential significant adverse effects on minority and low-income communities; and
4. Evaluate the proposed project's potential significant adverse effects on minority and low-income communities relative to its overall effects to determine whether any potential significant adverse effects on those communities would be disproportionate and, therefore, disproportionately high and adverse.

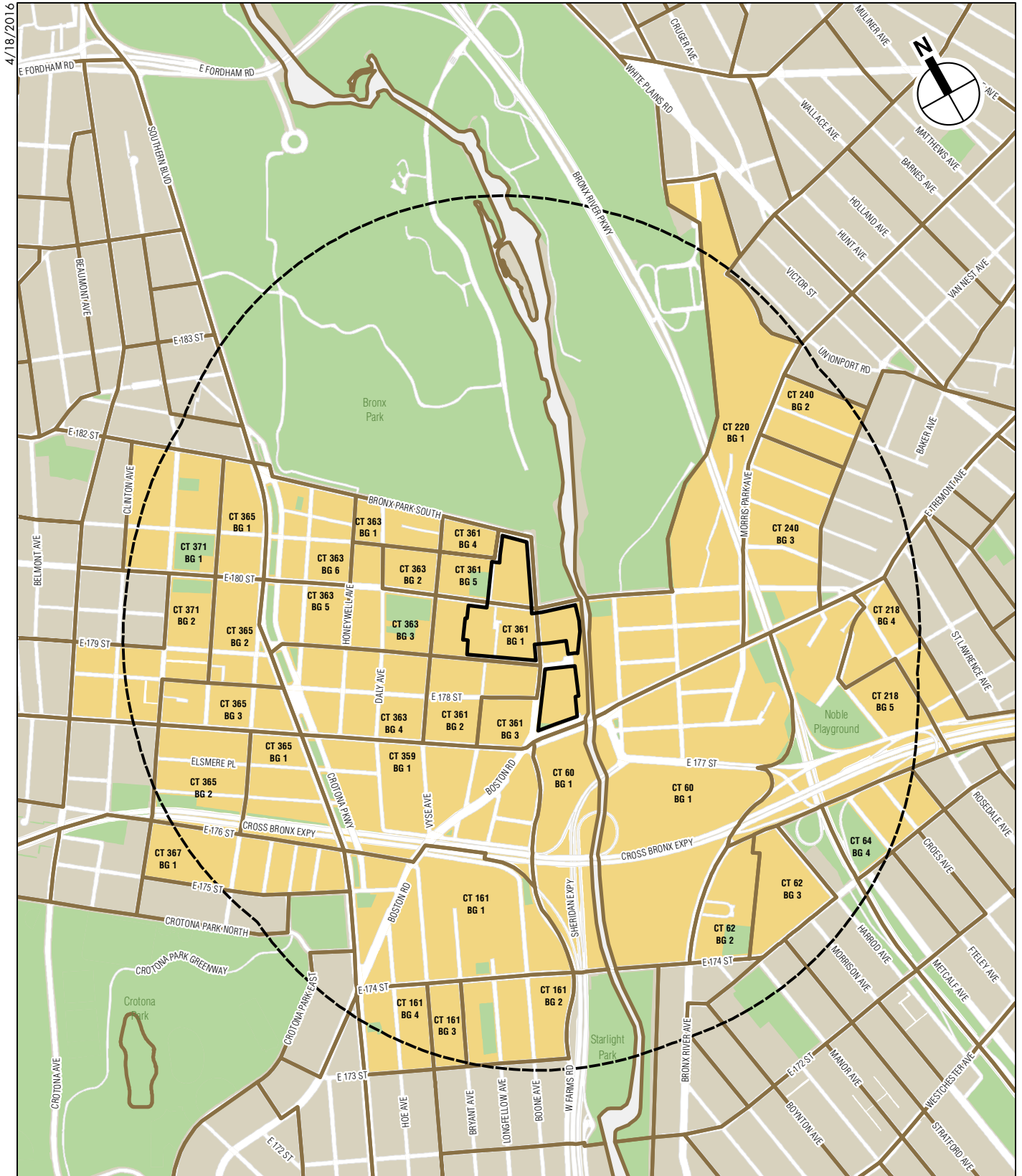
## DELINEATION OF STUDY AREA

The study area for environmental justice encompasses the geographic extent of potential significant adverse impacts resulting from the proposed project. The study area for environmental justice includes the 33 census block groups that are at least 50 percent within a ½ mile of the Development Site (see **Figure 19-1**).

## IDENTIFICATION OF MINORITY AND LOW-INCOME POPULATIONS

Data on race, ethnicity, and poverty status were gathered from the U.S. Census Bureau's *2010 Decennial Census* and *2013 American Community Survey 5-Year Estimates* for the census block groups within the study area. For comparison purposes, data for the study area as a whole, Bronx, and New York City were also compiled. Based on census data and CEQ guidance (described above), potential environmental justice areas were identified as follows.

- *Minority Communities:* CEQ guidance defines minorities to include American Indians or Alaskan Natives, Asian and Pacific Islanders, African Americans or Black persons, and Hispanic persons. This environmental justice analysis also considers minority populations to



include persons who identified themselves as being “some other race” or “two or more races” in the *2010 Census*. CEQ guidance requires minority communities to be identified where the minority population exceeds 50 percent, or where the minority population percentage is meaningfully greater than the minority population in the comparison areas. In the Bronx, the project’s primary comparison area, the minority population comprises 89.1 percent of the total population. Therefore, this analysis considers any study area block group with a minority population of greater than 50.0 percent to be a minority community.

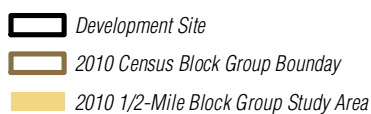
- *Low-income communities:* The percent of individuals living below the poverty level in each census block group, available in the 2009-2013 *American Community Survey*, was used to identify low-income populations. CEQ guidance does not specify a threshold to be used for identifying clusters of low-income populations. Therefore, for this analysis, any census block group with a poverty rate that is greater than in the Bronx was considered a low-income community. In the Bronx, approximately 29.8 percent of the total population is living below the federal poverty threshold.

### **C. MINORITY AND LOW-INCOME POPULATIONS IN THE STUDY AREA**

**Table 19-1** shows race, ethnicity, and poverty characteristics for the study area’s block groups, the study area as a whole, and for the Bronx and New York City as a whole. All of the study area’s 33 census block groups are minority communities, with minority rates ranging from 99.4 percent to 100.0 percent (see **Figure 19-2**). The overall minority rate in the study area is over 98 percent, compared to 89.1 percent in the Bronx and 66.7 percent in the city as a whole. The largest minority group in the study area is Hispanic or Latino (approximately 53.5 percent of the total population).

Of the 33 study area census block groups, 25 are low-income communities (see **Figure 19-3**). Poverty rates within these communities range from 30.0 percent to 67.8 percent. Poverty rates within the block groups overlapping the project site vary, from a low of 22.2 percent of individuals living in poverty to as high as 66.1 percent. Overall, the environmental justice study area is a low-income community with a poverty rate of 44.5 percent. The poverty rate for the study area is considerably higher than the poverty rate for both the Bronx (29.8), and New York City as a whole (20.3).

Source: U.S. Census Bureau, 2010 Decennial Census

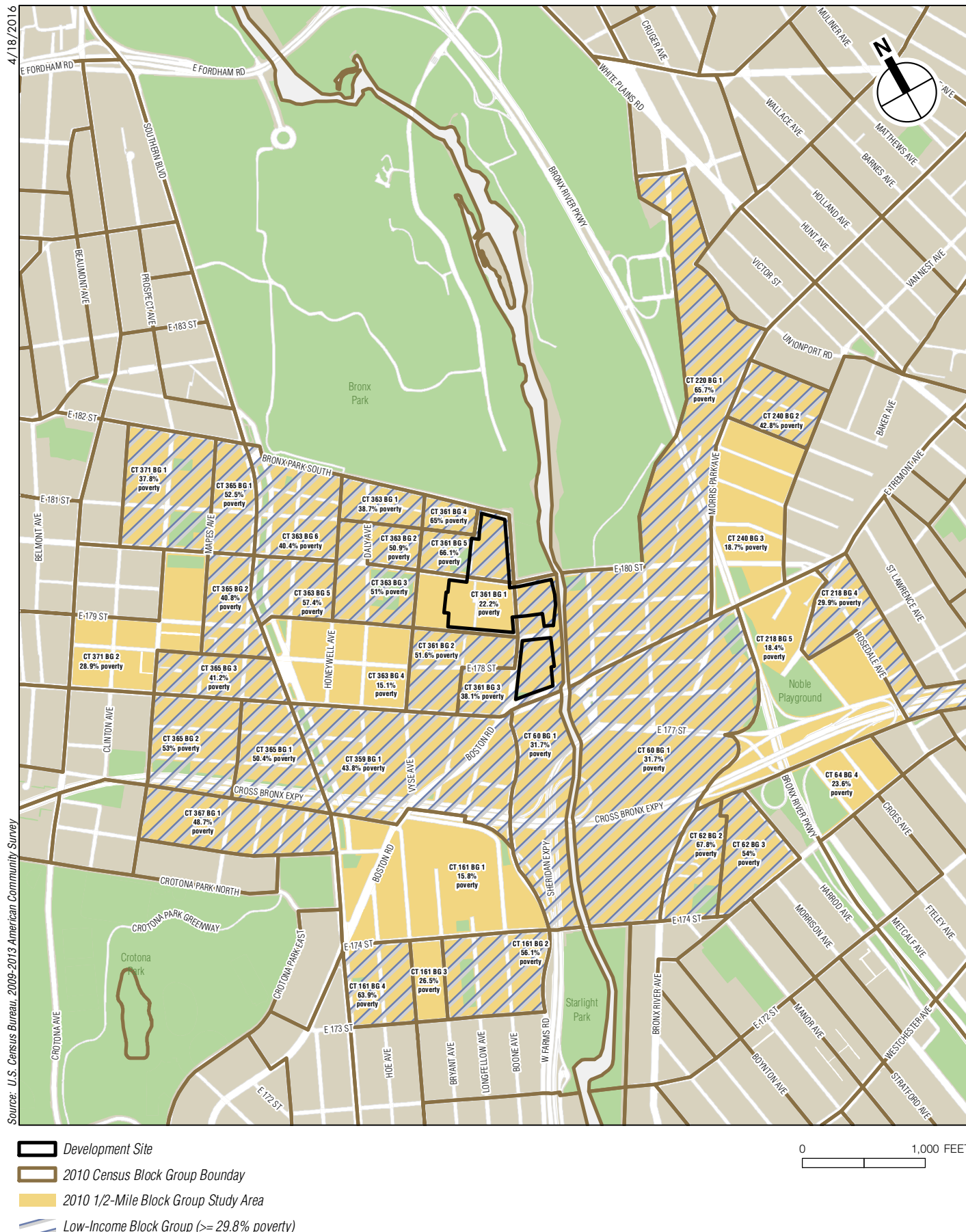


*Note: All study area block groups are minority communities, over 50% minority*

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Environmental Justice Study Area  
Minority Population  
**Figure 19-2**







Environmental Justice Study Area  
Low-Income Population  
**Figure 19-3**

**Table 19-1**  
**Environmental Justice Study Area Race and Poverty Data**

Bronx Census Tract	Block Group	Total Population	Race and Ethnicity						Individuals Below Poverty Level
			White (non-Hispanic)	Black (non-Hispanic)	Asian (non-Hispanic)	Other (non-Hispanic)	Hispanic or Latino	Total Minority	
60.00	1	1,129	0.1%	13.1%	0.3%	1.7%	83.1%	99.9%	31.7%
62.00	2	1,569	0.1%	35.1%	0.0%	1.3%	63.4%	99.9%	67.8%
62.00	3	2,009	0.1%	35.3%	0.5%	1.3%	62.3%	99.9%	54.0%
64.00	4	898	0.4%	32.0%	3.0%	6.0%	57.5%	99.6%	23.6%
161.00	1	967	0.1%	36.5%	0.5%	2.2%	60.1%	99.9%	15.8%
161.00	2	953	0.2%	42.0%	0.7%	0.6%	55.7%	99.8%	56.1%
161.00	3	1,038	0.3%	29.6%	0.4%	1.1%	68.4%	99.7%	26.5%
161.00	4	1,422	0.3%	27.6%	0.3%	0.8%	69.9%	99.7%	63.9%
218.00	4	935	0.4%	16.8%	2.9%	1.1%	76.5%	99.6%	29.9%
218.00	5	794	0.6%	34.6%	0.3%	1.8%	60.1%	99.4%	18.4%
220.00	1	1,487	0.1%	21.9%	2.4%	2.5%	72.0%	99.9%	65.7%
240.00	3	1,198	0.3%	21.5%	2.8%	2.7%	65.4%	99.7%	18.7%
359.00	1	2,061	0.0%	23.7%	1.1%	1.1%	72.4%	100.0%	43.8%
361.00	1	1,300	0.1%	33.8%	0.8%	1.6%	63.2%	99.9%	22.2%
361.00	2	1,622	0.1%	15.5%	1.2%	1.7%	80.6%	99.9%	51.6%
361.00	3	1,214	0.2%	31.1%	0.5%	0.7%	67.1%	99.8%	38.1%
361.00	4	841	0.5%	15.1%	0.0%	0.4%	84.1%	99.5%	65.0%
361.00	5	1,042	0.5%	33.4%	1.2%	0.6%	63.9%	99.5%	66.1%
363.00	1	1,301	0.1%	21.2%	0.5%	1.5%	74.6%	99.9%	38.7%
363.00	2	856	0.2%	21.0%	0.0%	2.0%	75.4%	99.8%	50.9%
363.00	3	1,398	0.2%	21.7%	0.0%	0.7%	77.2%	99.8%	51.0%
363.00	4	1,300	0.3%	24.6%	0.5%	1.5%	72.2%	99.7%	15.1%
363.00	5	1,121	0.4%	16.9%	0.6%	0.4%	81.3%	99.6%	57.4%
363.00	6	1,533	0.4%	26.3%	0.4%	1.3%	71.1%	99.6%	40.4%
365.01	1	1,141	0.1%	51.0%	0.3%	1.8%	44.8%	99.9%	52.5%
365.01	2	1,769	0.1%	52.5%	0.0%	2.9%	44.0%	99.9%	40.8%
365.01	3	1,055	0.3%	19.4%	0.4%	0.7%	78.2%	99.7%	41.2%
365.02	1	1,258	0.1%	25.4%	0.4%	0.4%	72.8%	99.9%	50.4%
365.02	2	1,165	0.2%	29.7%	1.0%	2.3%	65.1%	99.8%	53.0%
367.00	1	1,076	0.1%	30.5%	0.5%	0.7%	67.8%	99.9%	48.7%
371.00	1	1,197	0.1%	19.4%	0.3%	1.3%	77.1%	99.9%	37.8%
371.00	2	1,167	0.2%	51.3%	0.1%	1.2%	46.7%	99.8%	28.9%
Study Area as a Whole		39,816	1.4%	28.7%	0.7%	1.5%	67.8%	98.6%	44.5%
Borough of the Bronx		1,385,108	10.9%	30.1%	3.4%	2.1%	53.5%	89.1%	29.8%
City of New York		8,175,133	33.3%	22.8%	12.6%	2.8%	28.6%	66.7%	20.3%

**Notes:**

 indicates minority community  
 indicates low-income community

**Sources:**

Population: 2010 Decennial Census  
Race/Ethnicity: 2010 Decennial Census  
Poverty: 2009-2013 American Community Survey 5-Year Estimates

## **D. PUBLIC PARTICIPATION**

EO 12898 requires federal agencies to work to ensure greater public participation in the decision-making process. In addition, CEQ guidance suggests that federal agencies should acknowledge and seek to overcome linguistic, cultural, institutional, geographic, and other barriers to meaningful participation.

The Phipps Lambert Houses are located in Census Tract 361, Block groups 1, 2, 4, 5, (see **Figure 19-2**). The Phipps Lambert Houses includes approximately 2,098 residents, which represents approximately 5 percent of the study area's population. As discussed in Chapter 1, "Project Description," current Lambert Houses residents will remain on site after redevelopment of the Development Site, and the residents constitute an important stakeholder group. As discussed below, the proposed project would have a strong positive impact on current Lambert Houses residents by greatly improving the quality of the housing they live in.

The proposed discretionary actions and funding require review under City Environmental Quality Review (CEQR), the State Environmental Quality Review Act (SEQRA), and the National Environmental Policy Act (NEPA). HPD acts as a Responsible Entity for federal environmental reviews pursuant to 24 CFR Part 58. HPD and HUD therefore serve as Involved Agencies under CEQR. This EIS includes NEPA areas of analysis, as appropriate, to satisfy federal environmental review requirements. Therefore, the proposed project's public outreach program has also been supplemented by the review process for this EIS under NEPA, SEQRA, and CEQR, and the city's Uniform Land Use Review Procedure (ULURP). Along with its issuance of a Positive Declaration, HPD, acting as the lead agency on behalf of the New York City Planning Commission, issued a draft scope of work for the EIS on September 18, 2015.

Phipps Houses staff met with Community Board 6 in February 2015 to brief them on the redevelopment proposal for Lambert Houses and solicit feedback. A public scoping meeting was held for the proposed project by HPD's Division of Building and Land Development Services – Environmental Planning Unit on October 21, 2015, and the comment period remained open through November 2, 2015. The public scoping meeting was held at a local venue, the Daly Community Room located at 921 East 180th Street, Bronx, NY.

Phipps Houses staff will keep the Lambert Houses residents informed of the project status and has already worked with tenants of one of the Development Site buildings to relocate, at Phipps Houses' expense, within the Lambert Houses development in anticipation of the redevelopment project. Phipps also intends to hold a meeting for all Lambert Houses tenants prior to the start of redevelopment and will keep tenants informed of progress during the redevelopment process.

## **E. ENVIRONMENTAL EFFECTS**

### **SUMMARY OF BENEFITS**

As discussed throughout this EIS, the proposed project would result in beneficial effects for the local community. The project is intended to improve the quality of life for current Lambert Houses residents while increasing the number of affordable housing units in the Development Site. The current Development Site is underdeveloped, with less floor area than even the current zoning districts allow, and less density than much of the surrounding neighborhood. The current buildings were constructed between 1970 and 1973 and have antiquated and inefficient building systems. In addition, the current configuration and circulation plan of the buildings with multiple



entrances and egresses, compromises building security by making control of access difficult. The retail space on site is equally antiquated, with storefronts set back far from the street wall, poor frontage, and inadequate storage space for merchants.

At the completion of the project, approximately 1,665 affordable residential units (934 new affordable housing units as compared to the No Action condition), 61,100 sf of retail and a new school of up to approximately 86,608 sf will be created. The proposed project would increase the density of development on the Development Site by more than doubling the number of affordable housing units and creating ancillary commercial and community facility uses in close proximity to public transportation. Furthermore, the proposed project makes a substantial contribution to the housing production goals of the Mayor's *Housing New York: A Five-Borough, Ten-Year Plan*. The future neighborhood retail and new school are intended to provide amenities that are currently lacking in the area and which would serve the existing residential population in addition to the project-generated population.

The proposed site plan would allow for buildings with fewer, securable points of access/egress, better fire egress, and improved security. It would better integrate Lambert Houses into the surrounding neighborhood by creating a street wall with ground floor uses such as retail and maisonette apartments that activate the streetscape. The proposed project would include more residential and retail space with more efficient configuration to better serve neighborhood needs. It would also result in improved open space for current and future residents, and would replace the existing inefficient building systems with modern, "greener" systems.

### **SUMMARY OF PROJECT COMPONENTS RELATED TO THE ENVIRONMENT**

As presented in the relevant chapters of this DEIS, the proposed project would include certain "Project Components Related to the Environment" (PCREs) to avoid potential significant adverse impacts in the areas of hazardous materials, air quality, and noise.

#### **HAZARDOUS MATERIALS**

As discussed in Chapter 10, "Hazardous Materials," based on the potential hazardous materials concerns identified by the Phase I Environmental Site Assessment, the parcels would be mapped with "E" designations on the zoning map for hazardous materials. The "E" designation constitutes an institutional control to require these measures on privately owned parcels. Phase II Investigations would be conducted in accordance with Sampling Protocols that would be pre-approved by the New York City Office of Environmental Remediation (OER). Based on the results of these investigations, Remedial Action Plans (RAP) and associated Construction Health and Safety Plans (CHASP) would be developed and submitted for approval to OER for implementation during the subsurface disturbance associated with construction to reduce the potential for human or environmental exposure to any identified (by Phase II Investigations) or unexpectedly encountered contamination during and following construction of the proposed project. Each RAP would address requirements for soil stockpiling, soil disposal, and transportation; dust control; vapor control measures (if any); dewatering procedures; quality assurance; and procedures for the closure and removal of any unknown petroleum storage tanks should tanks or contamination be unexpectedly encountered. Each CHASP would identify potential hazards that may be encountered during construction and specify appropriate health and safety measures to be undertaken to ensure that subsurface disturbance is performed in a manner protective of workers, the community, and the environment (such as personal protective equipment, air monitoring including community air monitoring, and emergency response

procedures). In addition, demolition of the existing structures would follow applicable regulatory requirements pertaining to asbestos-containing materials (ACM), lead-based paint, polychlorinated biphenyls (PCBs), and chemical disposal. With these measures, the proposed project would not result in any significant adverse impacts related to hazardous materials.

#### *AIR QUALITY*

To ensure that there are no significant adverse impacts of PM<sub>2.5</sub> and 1-hour NO<sub>2</sub> from the proposed project's heating and hot water emissions, certain restrictions would be required; these restrictions are detailed in Chapter 13, "Air Quality," and, depending on the parcel, relate to fuel type, exhaust stack location, and whether low NO<sub>x</sub> burners need to be employed. These restrictions would be set forth in "E" designations for air quality that would be administered by OER.

#### *NOISE*

To ensure that the proposed project would achieve the necessary building attenuation requirements detailed in Chapter 15, "Noise," an "E" designation for noise, to be administered by OER, would be mapped for each parcel included in the proposed project. In addition, the building mechanical systems (i.e., heating, ventilation, and air conditioning systems) would be designed to meet all applicable noise regulations (i.e., Subchapter 5, §24-227 of the New York City Noise Control Code and the New York City Department of Buildings Code) and to avoid producing levels that would result in any significant increase in ambient noise levels.

### **SUMMARY OF POTENTIAL SIGNIFICANT ADVERSE IMPACTS**

Consistent with the analyses presented in this DEIS, the proposed project would result in potential significant adverse impacts in the areas of community facilities (public schools), shadows (on historic resources and open space), and transportation (traffic and pedestrians). These impacts are described in Section F.

### **OTHER EFFECTS**

As discussed in Chapter 3, "Socioeconomic Conditions," during construction of the proposed project, Phipps Houses would, at its own expense, relocate current tenants of buildings to be demolished to other locations within the Lambert Houses development or within nearby Phipps buildings, demolish the unoccupied buildings, and then construct new buildings. Tenants would then be relocated to the newly constructed buildings. While tenants would be temporarily relocated during the construction period, their relocation would be within the Development Site. Further, there would be no permanent displacement, as tenants would be housed within the Development Site upon completion of the proposed project. Therefore, no further assessment of direct residential displacement is warranted.

### **F. ANALYSIS OF POTENTIAL FOR DISPROPORTIONATELY HIGH AND ADVERSE EFFECTS**

In accordance with CEQ guidance, the determination of the proposed project's potential to result in disproportionately high and adverse effects involved consideration of whether the adverse effect is considered significant (as employed by NEPA); whether the effects on minority or low-income populations would appreciably exceed or would be likely to appreciably exceed the risk

or rate to the general population; and whether the minority or low-income population would be affected by cumulative or multiple adverse exposures from environmental hazards. In making this determination, following CEQ guidance, it was recognized that impacts to minority or low-income populations may be different from impacts on the general population due to a community's distinct cultural practices, for example. The determination of disproportionately high and adverse effects also involved consideration of proposed mitigation measures and offsetting benefits.

The proposed project's potential significant adverse impacts in the areas of public schools, shadows, traffic, and pedestrians are analyzed below for their potential to result in disproportionately high and adverse effects on minority and low-income populations.

### **PUBLIC SCHOOLS**

The proposed project would include a 500-seat elementary school, subject to approvals and requirements of the School Construction Authority (SCA). This school would accommodate all project-generated demand for elementary school seats and would introduce more new capacity than elementary students, thereby decreasing the elementary school utilization rate. The project would result in an increase in the intermediate school utilization rate by more than 5 percentage points in a Sub-district that is already overcrowded, and would therefore result in a significant adverse impact on intermediate schools. Potential mitigation measures for the proposed action's impacts on intermediate school enrollment could include administrative actions undertaken by DOE, such as shifting the boundaries of school catchment areas within the CSD to move students to schools with available capacity, or creating new satellite facilities in less crowded schools. As an alternative, SCA could decide to reallocate school seats based on need at the time construction on Parcel 10 begins, and therefore the school to be constructed as part of the proposed project could be programmed with intermediate school seats, if this better meets the needs of Sub-district 2 of CDS 12. Absent reallocation of school seats or the implementation of other measures by SCA or DOE, the proposed project would result in an unmitigated significant adverse impact on intermediate school seat demand if projections prove correct.

The predicted shortfall of intermediate school seats in the sub-district where the proposed project is located would affect minority and low-income populations in the study area. However, this impact is not expected to result in disproportionately high and adverse effects on minority and low-income populations. As detailed in an analysis undertaken for the Halletts Point Rezoning project,<sup>1</sup> in New York City, schools with substantial minority/low-income population are no more likely to be very overcrowded than schools without substantial minority/low-income population. The analysis also noted that, based on the data utilized in the assessment, the vast majority of schools in the city have substantial minority and/or low-income populations.

### **SHADOWS**

The shadows analysis identified the potential for a shadows impact on the east façade windows of the Beck Memorial Church and on River Park.

The Beck Memorial Church is currently boarded up with plywood and locked, and all its windows sheathed in metal. Additional research found that services are no longer held in the

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<sup>1</sup> *Halletts Point Rezoning Final Environmental Impact Statement*, CEQR No: 09DCP084Q, August 9, 2013.

building; that the building has been boarded up and locked for at least four years; and that the windows were covered up because of the building's generally unsafe condition. The east façade windows of the church would receive between two and a quarter and four and a half hours of incremental shadow in the mornings, depending on the season. At times, the new shadow would eliminate the remaining sunlight from the east windows of the church. Therefore, given the substantial extent and duration of incremental shadows, the project could cause significant adverse shadow impacts to the windows, if they are uncovered by shutters and viewable from within a public space in the church interior. As noted above, no information is currently available regarding plans to re-open the church or make building repairs in the near future or by the 2029 build year for the proposed project.

River Park, adjacent to Parcels 1, 3 and 5 of the Development Site, would receive approximately six hours of new shadows in the mid-day and afternoons of the fall, winter and early spring, and the use of the park during these times could consequently be significantly impacted. In the late spring and summer, new shadows on River Park would be more limited in duration and extent but would still be substantial in the final hour of the analysis day and would cause significant adverse impacts in those seasons. It is expected that, as a neighborhood park, residents of the study area are the predominant users of River Park. Therefore, it is expected that this impact would affect the minority and low-income neighborhood population; however, shadows would affect the usability of an open space and would not represent an environmental or health hazard.

## **TRAFFIC**

As discussed in Chapter 12, "Transportation," traffic conditions were evaluated at 16 intersections for the weekday AM, midday and PM peak hours. In the 2029 With Action condition, the proposed project would result in significant adverse traffic impacts at a number of intersections during the weekday AM, midday, and PM peak hours. Some of the locations where significant adverse traffic impacts are predicted to occur could be fully mitigated with the implementation of the recommended mitigation measures detailed in Chapter 21, "Mitigation." At the intersections of East Tremont Avenue and Boston Road/West Farms Road, East Tremont Avenue and Devoe Avenue/East 177th Street, East 177th Street and Sheridan Expressway, East 178th Street and Boston Road, and East 180th Street and Boston Road, the significant adverse impacts could not be fully mitigated during one or more analysis peak hours.

The intersections that would have traffic impacts that could not be fully mitigated are located in minority and low-income communities. Similarly, congested levels of service exist along roadway corridors throughout the city in both minority/low-income communities and non-minority/non-low-income communities. Moreover, the proposed project's significant adverse traffic impacts would not result in any significant adverse mobile source air quality or noise impacts at the impacted intersections. Therefore, the proposed project would not be expected to result in any disproportionately high and adverse traffic effects on minority or low-income populations.

## **PEDESTRIANS**

Pedestrian conditions were evaluated at 15 sidewalks, 8 corners, and 6 crosswalks for the weekday peak hours. In the 2029 With Action condition, the proposed project would result in significant adverse pedestrian impacts at two segments of one crosswalk during the weekday AM, midday, and PM peak hours. Widening future crosswalks were identified to mitigate the projected pedestrian

impacts. With this mitigation measure, the proposed project would not be expected to result in any disproportionately high and adverse pedestrian effects on minority or low-income populations.

## **G. CONCLUSION**

Given all the facts and circumstances, the proposed project is not expected to result in any disproportionately high and adverse effects on minority and low-income populations. The proposed project would have an overall positive effect by improving the quality of life for current Lambert Houses residents while increasing the number of affordable units on the Development Site. \*