



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

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JOHN WEIS
Chair

ROBERT J. BENFATTO, JR., ESQ.
District Manager

June 8, 2011

Seth Diamond
Commissioner
Department of Homeless Services
33 Beaver Street, 17th Floor
New York, New York 10004

**Re: 127 West 25th Street
BRC Service Center and Proposed 328 Bed Homeless Shelter**

Dear Commissioner Diamond:

Manhattan Community Board 4 (CB4) at its Full Board meeting on June 1, 2011 approved the following letter related to the proposed facility and homeless shelter at 127 West 25th Street to be operated by the Bowery Residents Committee. This letter comes out of the May 10, 2011 Public Forum on DHS' Fair Share Analysis for the proposed 200-bed shelter for single adult males held by the Committee on Housing, Health and Human Services.

CB4 first opined on this proposed facility in July 2010. As you know, the proposal was, and still is, for 36 drug detox beds, 96 "reception center" beds, and a 200-bed homeless shelter. We wrote that "the size of the proposed facility is simply too large Siting a social service facility of this scale on a block surrounded by a dense residential neighborhood is not good policy. In the past 20 years, the Board has consistently reviewed and approved many smaller scale social service proposals. The Board supports integration not concentration of social services throughout Community District 4. Integration promotes acceptance by all community stakeholders as these well managed facilities tend to disappear into the streetscape and do not burden a single block." CB4 still stands behind those words.

In fact, CB4 reaffirms that "[t]he current proposal contains too many beds. The 128 beds transferred from the Lower East Side, the Reception Center and Chemical Dependency Crisis Center; serve an extremely needy and difficult to serve population. The 200 bed homeless shelter component for mentally ill chemically addicted males is too large in itself. Combining the facilities together would create too high a concentration of social services serving persons with highest level of need in one location. Serving the homeless in small settings best meets their needs and the needs of the surrounding community. The Board cannot support the proposed 200 bed shelter component."

CB4 also strongly supports Speaker Christine Quinn in her February 22, 2011 letter to you and her recent May 18, 2011 letter to Deputy Mayor Linda Gibbs. We too believe that the facility should be on hold until the present lawsuit has been resolved and that the 200-bed proposal be withdrawn.

At the May 10th Public Forum a host of requests related to the facility, the 200-bed proposal, and the Fair Share Analysis arose. We were assured a speedy response but are still waiting for any response. The requests were:

1. There was an issue as to whether BRC would be in violation of Administrative Code § 12-712 which requires that no shelter be over 200-beds. In this case there is a question as to whether the 96-bed “reception center” funded under a DHS contract is also a shelter and thus the facility would have 296 beds and be in violation of the law. Community residents attending reported that the City had admitted in a letter that the facility is a shelter with over 200 beds and that the city would be invoking the Camp LaGuardia exception under Administrative Code § 12-715(a)(6) and that this would require a ULURP under Administrative Code § 12-715(b). We are not going to opine on a legal question before the court accept to say that it has merit. However, DHS and the attorney for Corporation Counsel promised to forward all relevant court documents we have not previously received and to answer any questions. We have followed up and we have received no response. We again request that DHS provide us with all court papers related to the BRC suit.
2. We request that a 24-hour number be made available to the community so they may call with concerns at any time of the day. We also thank BRC for the formation of the Community Advisory Committee (CAC) that we sit on and although we know BRC has tried to expand the membership we ask it keep trying to make sure the CAC incorporates as many stakeholders as possible.
3. The Fair Share Analysis states that BRC will be staffed 24 hours by 5 full-time employees at all times and a total of 79 staff members. We have no idea how many will be security personnel. We have no idea how many people will be at the front desk. We have no idea on rotation. One of our conditions of approval, besides for limit of 128-beds, finding of proper zoning, and establishment of a CAC, was the “development of a final Security plan with community review and input”. To date we have not seen anything that would satisfy that condition. At a minimum several questions need to be addressed:
 - **Community Technicians:** The Fair Share Plan states that there will be 61 of these 70 security staff are “Community Technicians” whose job descriptions will include “maintaining safe and sanitary conditions in the building, monitoring and reporting on client interactions, and providing emergency response and crisis intervention.” To understand how this complements the 5 front desk staff, it would be beneficial to see the distribution of these personnel (by floor, as well supplemental to the front desk staff and outdoor patrolling). We would also want to know that this staff will receive training in emergency response and crisis intervention;

- **Security Cameras:** We are pleased to hear that there will be 80 security cameras both inside and outside the facility. We would like to see plans on where the camera's will be located (particularly in the exterior location) and where (and who will read) the monitors of what they record and what the protocol would be for any observed front area/exterior incident.
- **Surrounding area security.** The fair plan states that "BRC also plans to have additional staff who will be dispatched from the front door post on an on-going as needed basis." On separate occasions both BRC and DHS staff have indicated there would be security personnel walking around the block at time. Understanding the frequency, duration and distance of the exterior security rounds would be helpful.
- **Minimum, maximum and anticipated shelter average Length of Stay:** The Fair Share Analysis describes this shelter as an Emergency Shelter. However, the Open Ended RFP that is referred to in the shelter that BRC responded to for this program is for transitional housing. Understanding whether this is considered emergency or transitional housing and the minimum, maximum and anticipated average length of stays enables the neighborhood residents the facility and the degree of turnover among residents why will see in the area.
- **Congregate/Dormitory Style or individual rooms:** The Fair Share Analysis states that this facility will be a congregate dormitory style facility (50 beds on each of 4 floors). At the Community Board public hearing earlier this year, BRC stated that the design would include half walls separating sleeping areas with desks (of at least 120s.f./person). While it is feasible both are the case, we would appreciate a clarification.

This Community Board has one other area of concern. In recent years there has been a concerted national effort to address the chronic, long term single homeless through "Housing First" initiatives – permanent housing with easily accessible support services. Many New York programs are cited as models. Several major and diverse regions in the country including Los Angeles, San Francisco, Columbus, Norfolk and Utah saw a resulting decrease in single homelessness. While 2010 data is not yet available, nationally HUD found a reduction in single homelessness between 2007 and 2009, despite the recession and increase in family homelessness. While we trust the expertise of DHS staff, creating additional large congregate dormitory shelters seems out of line with recent trends in single homeless services and would appreciate an explanation on how this program fits into the overall city vision for reducing homelessness.

We look forward to your prompt reply.

Sincerely,



John Weis, Chair
Manhattan Community Board 4
Committee



Sarah Desmond, Co-Chair
Housing, Health & Human Services

[signed 6/7/11]

Barbara Davis, Co- Chair
Housing, Health & Human Services Committee

cc: Deputy Mayor Linda Gibbs
Speaker Christine Quinn
BRC- Muzzy Rosenblatt
DHS – George Nashak, Alex Zablocki, Todd Hamilton
Corp Counsel – Christopher King
Flatiron-Chelsea Coalition
Flatiron BID
MCB5
Local elected
25th and 26th Street Block Associations
BRC CAC
NYPD – 13th Precinct