

April 7, 2016

Ms. Jessica Katz, Assistant Commissioner
Special Needs Housing
NYC Department of Housing Preservation & Development
100 Gold Street
New York, NY 10038

Re: 108th Street WSFSSH Affordable Housing Proposal

Dear Ms. Katz:

Community Board 7 thanks you and your office for attending our March 16th Land Use Committee public meeting, which also involved members from three other CB7 committees: Housing, Health & Human Services, and Transportation. The presentations by Laura Jervis and Paul Freitag of WSFSSH, William Stein of Dattner Architects, were very informative. We appreciate everyone taking the time to present to the community well in advance of the start of any ULURP process regarding the city-owned lots on 108th Street. As you will recall, the community and its board had many questions regarding the proposal. We are writing today to provide a summary of our primary concerns and to request follow-up meetings prior to any certification or start of the ULURP process.

Desire for a Comprehensive Approach:

CB 7 strongly supports the creation and preservation of affordable units within the Upper West Side community. In this regard we are open to the proposal to convert the city-owned garages to affordable units for seniors. However, we are also concerned that any proposal to convert these properties, which would result in the loss of a significant number of parking spaces, must also incorporate sufficient data and analysis on how such loss of parking would impact the immediate neighborhood. This analysis should consider both the transportation and economic impacts among others. While the community understands that a full environmental impact assessment of the proposed conversion would need to be completed prior to any ULURP certification, we urge HPD to work with DOT and its other sister agencies to initiate this work early and to report back to the community frequently.

Parking:

While the community appreciates the initial parking study, prepared by Nelson/Nygaard for WSFSSH, we believe its scope of work was too narrow. Foremost among the concerns raised by neighbors of the proposed project is the prospective loss of nearly 700 indoor parking spaces, approximately one-third of all such spaces within a twelve block radius. The Nelson/Nygaard study suffers from the obvious absence of any statistics as to the number of available (i.e. unrented) spaces in

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the neighborhood. It would not avail current parkers at the 108th Street garages to know that there are 2,900 spaces in the area, without knowing whether any of these spaces are vacant. We would hope, therefore, that a further study be conducted detailing actual availability both for monthly and transient parkers.

We also believe it would be useful to understand a breakdown of the users of the parking garages with respect to the following: 1) the number of monthly parkers; 2) the number of daily transient parkers; 3) how many monthly parkers utilize their cars more than twice a week; 4) where the monthly parkers reside; 5) how many monthly parkers have used the garage for three years or more.

A proposal was floated at our meeting on March 16th that the operator of the existing garage be permitted to construct a new subterranean garage at his own expense. We hope HPD and the garage operator will jointly explore the feasibility of this plan as well as how many users such might accommodate under various operational options (e.g. valet parking) In addition, the rate of such parking should be within the purchasing power of the immediate community and parking garage fees north of 96th Street. While we would not expect the City to subsidize the construction of this garage, we would expect that you explore the feasibility of appropriate rent reduction(s) in recognition of his capital investment and parking rates.

Senior Housing:

CB7 is particularly supportive of the creation of new senior housing given our community demographics. Please provide clarification as to the expected increase in senior housing tenants in the current WSFSSH proposal and whether the bulk of these tenants would be drawn from Upper West Side neighborhoods. Ideally, it would be helpful to understand the exact distribution of senior beds and what the impact would be to total beds if HPD and WSFSSH considered reducing the size of the proposed project to encompass only two of the three proposed lots.

Central Park Volunteer Ambulance Unit:

Based on the discussion at the March 16th meeting, we understood that should the proposed project move forward, HPD will ensure the CPVA unit is relocated to a suitable indoor facility that does not result in any negative impacts to its current response times and work. In addition, we request periodic reports as to the progress or lack thereof being made in this regard.

Fair Share Distribution of Social Services:

CB7 is proud of its diverse and extensive network of social services and assisted units. However, many community residents believe that the Upper West side has received more than its fair share of such facilities. Does HPD perceive any negative impacts associated with the proposed WSHFSH project other than the loss of parking, and, if so, has HPD developed any plans to deal with these impacts? In this connection, we ask that you consult and coordinate with sister agencies charged with delivering services to our communities.

Additional Questions:

Finally, CB7 requests HPD respond to the following additional questions, which were not discussed at the March 16th meeting:

- Has HPD or any other government entity conducted a Schedule A/Phase A environmental study of the properties? In particular has HPD or another agency determined if the site(s) are likely to be contaminated? If remediation is anticipated, how much of the proposed funding has been earmarked for removing the contamination and who would bare the cost of such?

- Can HPD provide a general breakdown of the proposed WSFSSH project financing? Specifically, is any portion of the \$50,000,000 set aside as part of the Collegiate School development anticipated to be used on this project?

Thank you in advance for your prompt response to our comments.

Yours,



Page Cowley
CB7/M Land Use Committee



Richard Asche, co-chairs



Elizabeth Caputo
Chair

Cc:

Manhattan Borough President Gale A. Brewer
Council Member Mark Levine, 7th District
Paul Freitag, Director, WSFSSH
CB7 Chairs of Transportation, Health & Human Services and Transportation committees