



July 20, 2010

Robert J. Benfatto, Jr.
District Manager
Manhattan Community Board 4
330 West 42nd Street
New York, NY 10036

Dear Bob,

Thank you again for the opportunity to respond to questions from members of the community about BRC's proposal to develop 127 West 25th Street. Attached are the responses to the questions we received from you last Friday, July 16, 2010.

Sincerely,

A handwritten signature in black ink, appearing to read "Muzzy Rosenblatt".

Muzzy Rosenblatt
Executive Director

Responses to “Follow-Up Questions to BRC” from Community Board 4

Zoning

1). It has been suggested that this facility should fall under “Use Group 3” given the healthcare-related programs. Why does BRC believe that the facility falls under “Use Group 5” given the extent of the services that will be provided?

On January 21, 2010, the New York City Department of Buildings (“DOB”) determined that the design, arrangement and operation of the BRC facility is classified as a Use Group 5, transient hotel, pursuant to the Zoning Resolution of the City of New York (“Zoning Resolution”), and is permitted as-of-right in the Premises underlying M1-6 zoning district.

Section 12-10 of the Zoning Resolution defines a “transient hotel” as a building or part of a building in which:

- a) living or sleeping accommodations are used primarily for transient occupancy, and may be rented on a daily basis;
- b) one or more common entrances serve all such living or sleeping units; and
- c) twenty-four hour desk service is provided, in addition to one or more of the following services: housekeeping, telephone, or bellhop service, or the furnishing or laundering of linens.

The DOB held that, since the sleeping accommodations are used primarily for transient occupancy, the facility provides a single common 24-hour desk check-in entrance serving all sleeping units, housekeeping and laundry services, as well as a dining area, the use of the Premises is a Use Group 5 “transient hotel”, as defined in Sections 12-10 Zoning Resolution. For these and other reasons, we believe the facility is appropriately classified as Use Group 5.

Size of Facility

2). If the current proposal to open a 200 bed shelter is reduced in size, what other uses has BRC considered for this space?

We come to this project at a time when the need for the services BRC provides is great. Not surprisingly in these difficult times, homelessness is on the rise, as measured both in the number of people being housed on any given night in shelters and safe havens, and in the number of people being counted living on the streets and other public spaces (e.g. subways, parks, bus and train stations, etc.) And in New York City, unlike anywhere else in this country, a homeless person in need of shelter is entitled to it by court order, thanks to litigation brought three decades ago by the Coalition for the Homeless. BRC has for 40 years dedicated itself to breaking the cycle of homelessness and helping people reclaim lives lost. So when the opportunity presented itself not only to relocate programs but to be in a position to help even more individuals who are homeless obtain first shelter and then permanent homes, and to help the City we live in be in a position to do the same, we thought it was a good thing, and we still do. Given the state of need in our City, BRC believes it would be irresponsible, and indeed inhumane, to allow 200 homeless individuals to be left out in the cold when the opportunity to provide them shelter and the services they need is present and available.

Staffing

3). What is the breakdown of the 270 staff members by occupation and responsibility?

We currently plan to have 109 counseling and clinical staff, 79 security staff, 54 administrative staff, 17 food services staff, and 11 maintenance staff.

4). Of the 74 security personnel, how many will be onsite at a given time?

BRC will have 79 individuals assigned to 127 West 25th Street who will have as their primary responsibility the safe and secure operation of the facility. These individuals' job titles are Community Technician, Front Desk Worker, and Shift Supervisor. They will be BRC employees. Our current plan provides for a minimum of 16 such staff on site at any given time.

5). What other responsibilities do security personnel have?

Community Technicians, Front Desk Workers and Shift Supervisors have, as their primary responsibility, maintaining a safe and secure environment. They do so by maintaining regular interaction with, and observation of, the clients and their environment. These 79 staff will:

- receive and greet every individual entering the facility checking to make sure they are existing clients or staff with valid ID, or if they are new admissions, that they are appropriately screened, including searching their clothing and possessions, and confiscating anything that would pose a danger to health or safety
- receive every individual upon their arrival at their designated program, ensuring that they are on the floor and in the program to which they belong
- regularly conduct rounds throughout the facility and its exterior perimeter
- monitor security cameras safe and appropriate activity, and engage and resolve all behavior that is inappropriate and/or poses a risk to safety and health
- take immediate action to resolve any situation that could be or is a risk to health and safety, including:
 - communicate with police and emergency personnel
 - perform First Aid and CPR
 - de-escalate conflict
 - maintain order through controlling movement in the facility
- record their observations in a security log

In addition, these staff will have other duties, all of which enhance their ability to observe activities, maintain order, and take action immediately as needed. These additional responsibilities include:

- distribute supplies, such as linen and toiletries
- conduct fire drills
- answer phones

6) How many personnel will be at the front desk at a given time? Is security their primary responsibility? Are there other personnel whose primary responsibility is security on the first floor?

There will be one individual at the front desk at all times (24 hours a day, 7 days a week). Ensuring the maintenance of a safe and secure environment is their responsibility. They do so by monitoring every individual entering the facility checking to make sure they are existing clients or staff with valid ID, or if they are new admissions, that they are appropriately screened, including searching their clothing and possessions, and confiscating anything that would pose a danger to health or safety. They will have cameras at their desk to monitor the first floor, elevators, stairwells, and building exterior, as well as immediate visual access to the sidewalk outside the building. The front desk post will not be vacated except to take appropriate action in an emergency. In addition to the front desk position, exterior building patrols will be assigned to other security staff as part of their regular rounds.

7). Are there any licensed physicians on staff? How many?

BRC's administrative and executive staff will have their offices at 127 West 25th Street, including BRC's Medical Director, who is a psychiatrist by license. This individual's role as Medical Director is administrative, overseeing the agency's policies and procedures as it relates to serving its clients. She will be present in the facility on a part-time basis. In addition, there will be one full-time psychiatrist available.

8). Will there be a 24 hour nursing staff available for clients?

There will be 24-hour nursing staff available. in the Chemical Dependency Crisis Center.

Security Plan

9). Will BRC publish its plan once it's developed?

10) What is the security plan for the back of the building?

Safety and security are of paramount importance to BRC, and BRC very much appreciates the concerns and fears that have been articulated by those who live and work on the block and in the community. In our desire to be responsive to these concerns, BRC has developed a safety and security plan, which is attached. This plan reflects the specific needs of maintaining internal and external safety and security at 127 West 25th Street and the surrounding neighborhood.

Physical Design

11). For each of the three residential programs, what is the proposed physical design for the residential programs. Specifically:

- How many square feet in each of the three programs will be for living space (rooms, common areas, kitchen/ dining, staff space, counseling space, health care services)
- How many residents per toilet? Sink? Shower?

The total square footage of the building is approximately 95,000 square feet. Of that, approximately 20,150 square feet are sleeping accommodations relating to the programs, with 8,500 square feet of common space, including dining on the second floor. Approximately 22,800 square feet will be used for administrative purposes. With respect to plumbing, the capacity for all programs combined is 328 residents, and we are currently contemplating 10 residents per toilet, 8 residents per shower, and 8 residents per sink, in compliance with the current New York City building code. In any event, we will do whatever is necessary to comply with the relevant requirements of the Department of Buildings, the Buildings Code, and any other relevant laws.

Programmatic

- 11). What is the average length of stay for the two existing programs?
- 12). What is the average length of stay for other shelters serving homeless residents?

By definition, each of the three residential programs is for transient stays and has as a goal the successful discharge and placement of its clients into longer term living situations. Overall, BRC projects that the average duration of program participation (the time between when the client is admitted to the program and when they are discharged) among the residential programs to be located at 127 West 25th Street will be 25 days.

- 13). BRC states don't do criminal background checks on incoming clients, but rather refer to the DHS's intensive psycho-social screening and meetings with parole/probation officers. If clients don't come through DHS, does that mean they are simply not screened for a past history of crime or violence?

For clients who are referred to BRC, we may and often do receive background information about them from the referral source, be it DHS or some other governmental or nonprofit agency. For our walk-in clients, they may bring some documentation, though they often do not. Regardless of the amount of documentation we receive, if the individual is in need, appropriate and eligible for our services, we welcome them. Once they are admitted, we conduct an extensive interview with the client – the psycho-social – where we gather, to the best of our professional ability, any and all relevant information that will enable us to assist the client successfully.

BRC believes fundamentally that we are all safer if those who are homeless and desire help are provided access to it, than if homeless men and women are left to live on our streets and in our parks and other public spaces. To achieve this, BRC strives to provide barrier-free access to our programs for those who are seeking the opportunity to benefit from the services we have to offer. We do not believe an individual's past criminal history should a justification for denying them access to the services they need and seek.

Funding

14). Please breakdown the capital budget by percentage and funding source for each of the following funders?

- Loans
- Landlord contribution
- BRC contribution

BRC is projecting a construction budget of approximately \$14 million (exclusive of furnishings), to be funded as follows: the landlord is making a contribution of just over \$4 million, BRC is borrowing just over \$8 million, and BRC has or will raise the remaining \$2 million.

Misc

15). Can BRC provide a list of any other social service provider, shelter, drug / alcohol rehab center, free clinic in the neighborhood?

BRC is not in a position to provide a list of all the social services in the neighborhood. We are aware that the neighborhood is losing services for those who are poor and in need. The past year has seen the closing of two drop-in centers for the homeless: Peter's Place on the 100 block of 23rd Street, (just two blocks south of BRC's site on the 100 block of 25th Street), and the Open Door on 41st Street and 9th Avenue. And before BRC's scheduled opening on the 100 block of 25th Street, GMHC will close its doors on the 100 block of 24th Street. Much further west, BRC is familiar with the wonderful services and good work provided by our colleagues at Hudson Guild, and of the critical role The Holy Apostle Soup Kitchen and the Chelsea Clinic play in the lives of the poor and needy.



Strategy for Safety and Security at 127 West 25th Street

This is a draft document and is subject to revision by security experts, local law enforcement officials, the BRC Community Advisory Committee and other community stakeholders.

Bowery Residents' Committee (BRC) has a strong and sustained commitment to serving individuals with a wide range of service needs including those affected by homelessness, mental illness, substance abuse, and HIV/AIDS. In each of BRC's 27 programs, we are dedicated to maintaining the welfare, safety, and security of our clients and staff at all times. Furthermore, BRC is committed to promoting the safety of the neighborhoods in which our programs are located. In the coming year, BRC plans to relocate several of our program sites to 127 West 25th Street. BRC has created a comprehensive and detailed safety overview to maintain security at the new facility.

Facility Design

The physical site for BRC's new facility is designed to promote security for both BRC staff and clients, as well as the community. Security at the facility will be enhanced through the use of the following technological devices:

- **Digital Camera System** – The new facility will utilize a digital camera security system in public areas of the facility, which will allow staff to view public areas from video screens. These video cameras, totaling over 80 in number, will be present within the facility on each floor, in all community areas, stairways, vestibules, hallways, group rooms, waiting areas, and in all other areas except where legally prohibited. Cameras will also be located outside of the facility to observe the front entrance, the sidewalk going in both directions, and the building's surrounding areas. BRC will also install increased lighting outside of the facility to facilitate monitoring of outside activity. All cameras will have a motion sensor installed. These motion sensors will detect any areas in which there is activity, and the video from cameras with activated motion sensors will come to the direct attention of staff. The camera system will operate 24 hours/7 days per week, with staff members monitoring the video screens at all times. Furthermore, all activity will be recorded and archived.
- **Turnstile ID Cards** – All BRC staff and clients will have ID cards that will allow them access to the facility. These ID cards will have a picture of the individual authorized to use the card and will be swiped through a turnstile at the front door of the building, which will permit individuals to access the elevator. The elevator will allow access to only the appropriate floors. Through the use of these turnstile ID cards, BRC will work to prevent unauthorized individuals from gaining access to the facility.
- **Hand-held Communication Devices** – All staff at the facility will utilize hand-held communication devices to contact other staff in the building. These devices will allow

for constant and immediate communication between staff members, which will enhance staff's ability to react quickly to any potentially unsafe situations.

Security Staffing

BRC recognizes that one key to maintaining program safety and security is working with the right staff – staff who have experience with the homeless population and who are able to create an environment of safety and support while also managing crises as they arise. In all of our programs, each BRC staff member who provides direct care to clients is focused on ensuring that the program and facility are operating in a safe and secure manner. All program management level staff, all clinical staff, and all other staff who are present in the program on a 24-hour per day basis are trained in the prevention and management of aggressive behavior. Below is an overview of the staff members who will have primary responsibility for monitoring and maintaining security at the facility:

- **Program Shift Supervisor** – Reporting to the Operations Coordinator, the Program Shift Supervisor is responsible for on-site operational duties within the new facility and the supervision of Community Technicians. The Program Shift Supervisor will facilitate security and safety of the building, defuse crisis situations, respond to emergency situations, and monitor and report on client interactions. The new facility will employ 13 FTE Program Shift Supervisors, and each will have First Aid and Fire Safety certification.
- **Community Technician** – Reporting to the Shift Supervisor, the Community Technician is responsible for duties such as maintaining safe and sanitary conditions in the facility, monitoring and reporting on client interactions, and providing emergency response and crisis intervention as necessary. All Community Technicians will have First Aid and Fire Safety certification. There will be 61 FTE of these positions at the facility.

BRC understands the importance of staff presence in preserving the safety of the facility. To provide another layer of security, staff will complete security rounds throughout the building in the dorms, bathrooms, and private areas.

In addition to the security staff on each floor of the facility, the front door of the facility will be staffed on a 24-hour basis. These 5.3 FTE staff positions will maintain the safety of the facility and the building site. BRC works hard to discourage our clients from congregating in front of our neighbors' homes and businesses, and we counsel clients around the issue of good community relations. BRC will have additional dedicated staff who will be dispatched from the front door post on an ongoing as-needed basis to minimize loitering around the building site and surrounding areas.

Safety Intervention Strategies

The security strategy for the new facility is designed to provide a safe environment for all residents and staff. In working with individuals to meet their service needs, BRC acknowledges that at times an individual may respond to circumstances or individuals in a manner that is counterproductive. Appropriate use of clinical intervention strategies during this time is of paramount importance to ensure a safe and successful outcome for all concerned. Strategies that

contribute to therapeutic communication, negotiation, problem solving, proactive prevention, and management of behavior through the use of de-escalation are recognized by the federal government as best practice models of service and approved BRC mechanisms to address individuals during this time. Staff work with clients to design individual crisis prevention plans, which support individuals during the earliest stages of distress before a crisis occurs. Prevention plans assist the client to identify practicable coping strategies, help staff to plan ahead, and assist staff in utilizing verbal interventions which prevent safety risks.

In the event that the behavior or actions of an individual cannot safely be addressed utilizing the aforementioned mechanisms, BRC staff adhere to prescribed protocols for ensuring client and staff safety. If a client engages in actions that present a safety risk, a determination will be made as to the best course of treatment needed for the individual at that time, with the understanding that he/she may or may not benefit from continued participation in the program.

BRC takes great care to ensure that all of the individuals we serve understand the rules and expectations of the program. Staff members work with each individual to reinforce the responsibilities that clients have while in the program. Individuals are instructed that in order to maximize their experience and ensure mutual respect for other clients and staff, the following actions are not permitted at the program site:

- Possession of a weapon
- Possession, sale, or consumption of alcohol or illegal drugs
- Other criminal behavior
- Violent behavior
- Behavior that endangers individuals or property
- Abusive (physical or verbal) behavior
- Chronic, repeated disruption of BRC operations

Any display of such behavior will be met with immediate and appropriate staff response. This response may include contacting 911 with potential arrest or immediate escort from the facility.

BRC will further enhance the safety of the program by performing searches of residents' lockers and bed areas. An initial search of each client's belongings will take place upon admission to the program, and thereafter staff will perform both regularly planned searches and random searches as needed. Regular searches of clients' lockers and bed areas will be performed on a constant rotating basis by BRC Community Technicians under the supervision of the Shift Supervisor. If it is determined that a client is in possession of items that pose a safety risk, immediate action will be taken as outlined above.

Staff Training

Another important component of program security is the ability of new facility staff to quickly react to and resolve crisis situations. BRC approaches staff development from a holistic perspective, maintaining an agency-wide training curriculum managed by our full-time Director of Training, Staff Development, and Recruitment. A comprehensive staff orientation is mandatory for all employees. As part of BRC's agency-wide training program, all staff at the

new facility will be trained in techniques to maintain a safe facility environment. These in-service trainings will include:

- Crisis prevention
- Cultural competency
- Universal precautions
- CPR
- First aid
- Professional boundaries
- Harassment prevention

All staff at the new facility will be appropriately trained for their positions, maintain required licenses and certifications, complete mandated staff education sessions, and adhere to the human resource policies and practices of BRC. Staff at the new facility will also be trained and instructed to call 911 when clients are in medical or psychiatric distress. They will complete an incident report on each of these occasions.

BRC's ability to train the staff at the new residence is strengthened by several ongoing crisis management initiatives already in place. In all of our programs, BRC has instituted external training provided by certified trainers from the Crisis Prevention Institute (CPI), which is internationally recognized as the gold standard for crisis prevention and intervention training. This CPI training provides staff members with a variety of skills aimed at de-escalating and preventing crisis situations. BRC has added CPI training to our initial employee orientation for all staff members, and all new facility staff will receive CPI training. Upon completion of the training, all staff receive a CPI-certification, indicating that they have the knowledge and skills to appropriately and effectively address crisis situations that may arise in the program.

Homeless Outreach

Recognizing that needy New Yorkers may be present and in need of services in the areas around the new facility site, BRC operates homeless outreach teams in the 25th Street area. Beginning in July 2010, BRC conducts regular and ongoing homeless outreach in the area from 23rd to 28th Streets and from 5th to 9th Avenues, including Madison Square Park. Teams will conduct outreach during the following hours:

- Monday: 7:00 p.m. to 11:00 p.m
- Tuesday: 3:30 p.m. to 7:30 p.m
- Thursday: 3:30 p.m. to 11:00 p.m.

Each outreach shift will commence in the park, and once completing all efforts in the park, will move west. BRC will adapt the outreach schedule as needed to have maximum impact. Additionally, BRC will work with the Flatiron BID homeless outreach team to ensure that all outreach efforts are coordinated and collaborative.

Fire Safety

The new facility will follow all FDNY and DHS regulations regarding fire procedures. There will be a designated Fire Safety Director on each shift, and he/she will be familiar with the

program site's fire safety plan that provides for fire drill and evacuation procedures in accordance with the Fire Prevention Code. The fire safety plan will be distributed to all staff and clients. In the event of a fire, the designated Fire Safety Director will notify FDNY and direct the evacuation procedures. Additional measures that will be taken to prevent fires include:

- Program staff will ensure that no obstructions are in the building's corridors or aisles.
- Necessary exit signs and lighting will be installed where required.
- All staff members will know the location and operation of fire extinguishers.
- There will be monthly testing of the fire alarms.
- Three fire drills will be completed and entered into a separate recording log each month.
- Each floor in the building will display a copy of the floor plan with the location of emergency evacuation exits clearly indicated.

Security Consultant

In addition to the internal efforts and actions BRC will take to facilitate safety, BRC has also retained the services of a security consultant, Gregory Thomas, to advise BRC as we relocate to the Chelsea area. Mr. Thomas will review all safety strategies, provide ongoing assistance and training related to security, and will interface with the local precinct to enhance BRC's security measures.

Recognized as one of the nation's leading safety experts, Gregory Thomas has over 20 years of experience in the fields of criminal justice and public safety. Mr. Thomas has held numerous executive positions over his career in public service, including Executive Director of the Office of School Safety and Planning for the New York City Department of Education; Assistant Commissioner of the New York City Fire Department; Associate Director of the City University of New York/New York City Police Department Cadet Program at John Jay College of Criminal Justice; Senior Investigator with the Mollen Commission, the mayoral commission created to investigate corruption within the New York City Police Department; and first Deputy Inspector General with the New York City Department of Investigation.