

APPENDIX VII

Criteria for the Location of

City Facilities



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October 13, 2017

Honorable Bill de Blasio
Mayor
City Hall
New York, N.Y. 10007

Dear Mayor de Blasio:

The Department of Homeless Services (“DHS” or the “Agency”) seeks to register a pair of contracts (“Contract(s)”) with West Side Federation for Senior and Supportive Housing, Inc. (“WSFSSH” or the “Provider”). DHS awarded the Contracts to WSFSSH pursuant to its Open Ended Request for Proposals for Shelter (“OERFP”). Under the proposed Contracts, WSFSSH will temporarily relocate its current Valley Lodge single adult shelter facility, which currently shelters 92 homeless single adults age 50 and older. Valley Lodge first opened in 1988 and is located at 149 West 108th Street, New York, NY 10025, in Manhattan Community District 7 (“CD 7”). Valley Lodge will be temporarily relocated to 340 West 85th Street, New York, NY 10024, also in CD 7, in Fall 2017. The temporary shelter on 85th Street will operate for a period of approximately three years in order to permit construction and renovation at Valley Lodge and its surrounding properties to renovate the Valley Lodge shelter, which will result in an expansion of shelter capacity from 92 beds to 110 beds, and will permit WSFSSH to construct permanent affordable housing and community facilities at the site. The proposed Contracts cover the temporary facility at 85th Street (“85th Street Facility”) and the to-be-renovated and expanded facility at 108th Street (“108th Street Facility”) (collectively, the “Facilities”).

The 85th Street Facility will consist of a 9-story 51,520-square-foot building located on a 7,663 square-foot lot in CD 7. Upon completion of construction and renovation, the 108th Street Facility will be housed in an 11-story, 193,000-square-foot building, of which 80% of the space will be set up for permanent, affordable housing (195 units), 16% for the homeless shelter (110 beds), and 4% for a Federally Qualified Health Center and other public, community spaces.

Pursuant to Section 203 of the New York City Charter, DHS submits this Fair Share Analysis (“Analysis”) to the Mayor, with copies to the affected Community Board, Borough President, and Department of City Planning (“DCP”). This Analysis considers various Fair Share Criteria (“Criteria”) developed by the City Planning Commission and embodied in Title 62 of the Rules of the City of New York. The Criteria included within DHS’s consideration include factors such as service needs (including the City’s legal mandate to shelter all homeless men, women, and children on an immediate basis), the efficient and cost-effective delivery of services, potential effects on neighborhood character, and concentration of similar facilities.

This statement records DHS's consideration and application of the applicable Criteria for the Location of City Facilities as required by Article 9 of the Criteria.

I. PROJECT OVERVIEW

A. About WSFSSH

West Side Federation for Senior and Supportive Housing, Inc. was formed in 1976 by a coalition of social service agencies, religious institutions, and community organizations. Together they worked to create a new form of housing – one that would meet the diverse needs of older people and persons living with special needs. WSFSSH's first building, the Marseilles, opened in 1980 and provided 134 independent apartments to low-income elderly and handicapped individuals.

In addition to serving independent seniors, WSFSSH now serves frail elderly individuals, older persons living with serious mental illnesses, homeless individuals, persons living with physically handicapping conditions, grandparents raising their grandchildren, and families. Today WSFSSH houses over 1,800 people in 24 buildings located on the Upper West Side, and in Harlem, Chelsea, and the Bronx. All WSFSSH housing is developed and run by WSFSSH.

The WSFSSH supportive housing model integrates compassionate property management with on-site social services. Working together with residents, their mission is to provide safe and affordable housing that supports the dignity of each individual and enhances community both inside and outside our buildings.

B. WSFSSH's Operation of the Shelter

WSFSSH's primary goal is to provide emergency shelter and appropriate supportive services for eligible homeless people in a safe and supportive environment, and to work with residents to ensure successful long term outcomes for residents, with an emphasis on permanent housing. Valley Lodge and its program are designed to serve individuals aged 50 and over who live with serious mental illness and/or physical frailty, including persons with addictive disorders and persons who have been incarcerated.

WSFSSH owns and operates the current Valley Lodge shelter on West 108th Street. The configuration of the current site consists of two old-law tenements that were connected and renovated in 1986. The building, which has not been updated or significantly renovated since 1986, is in need of structural and mechanical overhaul. Following the intended renovation and construction, the property on which Valley Lodge sits will not only incorporate an expanded Valley Lodge shelter (increasing capacity from 92 beds to 110 beds), but also 195 permanent affordable apartments intended to serve a mix of older single adults and families. Of these 195 apartments, 115 will be reserved for older, currently homeless adults, 60% of which will be initially referred by WSFSSH through Valley Lodge. The remainder of the renovated property will also include: a public restroom for use by children and parents in the adjacent Anibal Aviles Playground; space for three ambulances used by the all-volunteer Central Park Medical Unit; direct sidewalk access to community rooms within the building that may be used for broader community purposes; and a 5,000 square foot Community Facility space leased to a Federally Qualified Health Center for a use such as a daycare or a health clinic.

The proposed site for the temporary relocation of the Valley Lodge shelter during construction, located at 340 W. 85th Street, is well suited for use as a transitional residence for the homeless. Originally built as a

clubhouse, there is a commercial kitchen and dining area in the building, along with ample space for program and office functions. The residential areas of the building are configured as small (1-person) sleeping rooms surrounding two communal bathrooms on each floor. Current Valley Lodge social services staff will provide social services to residents at the 85th Street Facility. The social service team is comprised of a Clinical Coordinator and case workers. One of the caseworkers will be designated as a Housing Specialist. Each client will be assigned a caseworker. The caseworker and client will mutually develop and implement an Independent Living Plan (ILP) with goals and measurable objectives to support the client's goal of moving into permanent housing. The caseworker will provide counseling, advocacy, and case management to support the resident working towards her/his goals. In addition to individual work, a variety of group-work services will be offered to promote housing readiness, self-care, and health education services. The building will offer space for 12-step program meetings as well.

The proposed, expanded 108th Street Facility is also well suited for use as a transitional residence for the homeless. The expanded facility will continue to meet its founding goal of creating a single, unified building with shared social services and administrative offices. There will be separate entrances for the shelter component and the permanent housing and while some programs areas on the first floor and in the lower level will be shared, residential floors will not be shared and emergency egress and life-safety systems will be separate. The social services team will resume its activities at the expanded site in the same manner they are currently undertaken, and which will be undertaken at the 85th Street Facility, as described above.

The Contracts require WSFSSH to comply with DHS's policies and procedures and the applicable law. Hence, WSFSSH will be subject to the requirements embodied in state regulations (*see* 18 NYCRR Part 491) and to inspection by the New York State Office of Temporary and Disability Assistance ("OTDA"), a DHS oversight agency.

C. City and State Oversight

1. The Contract

DHS awarded the Contracts to WSFSSH pursuant to its submission of proposals under the OERFP. Upon the opening date for the 85th Street Facility, WSFSSH will begin to provide temporary housing and related social services to 92 single adults aged 50 and older. Following construction, estimated to be completed by July 2020, WSFSSH will return to the 108th Street Facility and continue the Valley Lodge shelter program at that site, providing temporary housing and related social services to 110 single adults aged 50 and older.

Like all other shelter contracts, the Contracts impose obligations on WSFSSH with respect to, among other things, the provision of social services, facility maintenance, security, and financial documentation and reporting. Additionally, working with each client, WSFSSH must develop an ILP that identifies specific goals toward permanency, establishes a timetable for the achievement of each goal, and states specific concrete tasks that the client will undertake to achieve each goal. The specific goals in the ILP directly address barriers to permanency as identified in the client's assessment, and the overarching goal of the plan is re-housing in the community with the supports necessary to prevent the client from experiencing another episode of homelessness. (See Section I.B. above.)

The Contracts also require WSFSSH to ensure that clients obey all rules, including adherence to a strict 10 p.m. evening curfew, to ensure safety and order inside the Site. (See Sections I.C(3) and II.4.1(b).) In addition, DHS works to respond and remediate concerns raised by the affected communities and elected officials. Accordingly, as required by all DHS shelter contracts, WSFSSH will form a Community Advisory Board ("CAB") and

implement a Good Neighbor Plan (“GNP”). The purpose of the CAB is to solicit and address community issues. The purpose of the GNP is to address how quality of life issues in the immediate area of the Site will be handled.

2. Physical Inspection and Performance Monitoring

DHS oversees and monitors the performance of its service providers, including WSFSSH, through comprehensive bi-annual site inspections and performance reviews. The results of these evaluations and inspections are recorded in a report; in response to deficiencies, the provider must submit a Corrective Action Plan. All of DHS’s service providers are subject to audit by the City and State Comptrollers and by DHS’s internal auditors. In addition, NYS OTDA has the authority to conduct an annual on-site review and inspection, consisting of an evaluation of the provider’s performance in rendering services to clients and a physical inspection of the Site. The Site is subject to these inspection and monitoring requirements.

3. Client Responsibility

Through DHS’s client responsibility program, clients are held accountable for working diligently with facility staff to follow their ILP in order to transition into permanent housing as quickly as possible. DHS clients must obey all shelter rules, which are designed to ensure safety and order inside the Facility. These rules include a strict 10 p.m. curfew. Rules and regulations are reviewed with clients during the intake process and reinforced during regular meetings with case management staff. In addition, an individual’s shelter stay may be discontinued if he engages in disruptive or gross misconduct, or dangerous or illegal behavior.

D. The City’s Legal Obligation

The City of New York is mandated by law and court order to provide temporary housing to every eligible homeless individual and family who seeks it. Under State and local law, and the Consent Decree rendered in *Callahan v. Carey* (the “Consent Decree”),¹ DHS is required to immediately provide temporary shelter to all eligible homeless men and women who apply for temporary housing assistance. As a practical matter, this means that the Agency must shelter homeless individuals the very same day that they apply to DHS. Accordingly, DHS must, and does, successfully shelter homeless individuals 24 hours a day, 7 days a week, and 365 days a year, in every borough. In 1986, New York State enacted regulations that not only codified key provisions of the Consent Decree, but also mandated more stringent shelter standards than those enunciated in it. Additionally, DHS’s mission is to prevent homelessness wherever possible, and to provide short-term emergency shelter and re-housing support whenever needed. In accordance with the legal mandate, and consistent with DHS’s mission, DHS partners with hundreds of shelter providers, business and faith-based leaders, and community members to meet the needs of homeless New Yorkers.

1. Unprecedented City Efforts to Prevent and Curb Homelessness

Over the past three years, as part of its comprehensive strategy to reduce homelessness, the Administration prioritized the placement of homeless New Yorkers into permanent housing as part of the commitment to combat poverty, prevent and alleviate homelessness, and expand affordable housing. In accordance with

¹ “Final Judgment by Consent,” Index No. 42582/79, Sup. Ct., N.Y. Co. (August 26, 1981). Provisions of the Consent Decree were held applicable to homeless women in *Eldredge v. Koch*, 118 Misc. 2d 163, 459 N.Y.S.2d 960 (N.Y. Co. 1982), *aff’d* 98 A.D.2d 675, 469 N.Y.S.2d 744 (1st Dep’t 1983).

these commitments, the City implemented new rental assistance programs and other permanent housing initiatives for homeless adults and children (e.g., Living in Community (“LINC”), SEPS and CITYFEPS, TBRA), New York City Public Housing Authority (“NYCHA”) public housing, HPD Section 8 housing, supportive housing and other public benefits.

These initiatives have enabled more than 51,500 New Yorkers to move out of or avert entry into City shelters from summer 2014 through December 2016 and an additional 13,005 so far this year. Additionally, the United States Department of Housing and Urban Development certified that the City ended chronic veteran homelessness in 2015. Over the course of three years, the City placed 3,153 homeless veterans into permanent housing, thereby reducing the overall number of homeless veterans by two-thirds. And, regarding permanent housing, since January 2016, when the City launched a task force to create 15,000 units of permanent, affordable supportive housing, the City has already awarded contracts to 11 organizations for the development of 550 units this year.

In addition to rental subsidies and public housing placements, DHS has also increased prevention and diversion efforts at Intake Facilities as well as in assessment program shelters. The City has increased investment in the Homebase program, a community-based social services program which aims to prevent homelessness. The City has greatly expanded its free legal services program, which has grown from \$6 million in the prior Administration to \$62 million. Evictions have now decreased by 24% since 2014 when the City expanded its legal services program. Finally, HRA staff are now stationed at designated shelters, as well as having a roving team of staff visiting key sites each week, to help troubleshoot and resolve any cash assistance issues impacting eligibility for rental subsidy programs, as well as identifying new opportunities for diversion.

Moreover, in March 2016, the City began implementation of HOME-STAT (Homeless Outreach & Mobile Engagement Street Action Teams). Partnering with existing homeless response and prevention programs across multiple city agencies (DHS, HRA, NYPD), HOME-STAT is the most comprehensive street homelessness outreach effort ever deployed in a major U.S. city. HOME-STAT increases the City’s ability to identify homeless individuals on the street from Canal Street to 145th Street and in other hot spots, and deploy outreach resources (social services, medical and benefits assistance) where they are needed most. As part of HOME-STAT, the NYPD has redeployed 40 additional officers to its 70-officer Homeless Outreach Unit to respond to calls concerning street homeless persons, encampments, large hot spots and those individuals experiencing emotional disturbances or exhibiting erratic behavior. Additionally, the City has already doubled the number of outreach workers from 191 to 387 to assist street homeless men and women, and last year the City moved 865 street homeless individuals into transitional programs or permanent housing.

Despite the fact that the City’s rental assistance and rehousing initiatives have enabled more than 51,500 New Yorkers to move out of or avert entry into City shelters from summer 2014 through December 2016 and an additional 13,005 so far this year, the vacancy rate in the adult shelter system is still below 1%. A low vacancy rate causes concern, not only because it indicates a shelter census that is nearly outpacing supply, but also because it limits DHS’s ability to effectively manage its shelter system in a manner most conducive to the individuals it serves.

The City is still suffering from the impact of the loss of thousands of units of affordable housing over the last decade. These losses are compounded by the fact that incomes have not kept pace with rising rents, so that many New Yorkers pay as much as 50% of their income in rent (an estimated 360,000 New York City households). Furthermore, the City has not recovered from the sudden termination of the Advantage rental assistance program in the 2011 State budget that resulted in a 38% increase in homelessness.

2. Turning the Tide on Homelessness: The Administration's Homelessness Plan

On February 28, 2017, the City released “Turning the Tide on Homelessness in New York City,” a comprehensive plan to address homelessness and shelter in the City, and to transform the shelter system that has built up haphazardly over nearly four decades (the “City Plan”). The City Plan has three main approaches: doing more to keep people in their homes by making housing more affordable and stopping illegal evictions; making operational reforms to better serve people in shelters; and a reimagined shelter strategy. This includes the closure of commercial hotel facilities and cluster site apartments (i.e. units in privately owned buildings used by DHS over the past 17 years to house homeless clients). The City’s efforts to reduce reliance on cluster site apartments has led to the closure of more than 1,000 such units.

Concerning shelter, the City Plan’s stated goals are to:

1. End the use of cluster apartment units by the end of 2021 and the use of commercial hotel facilities by the end of 2023;
2. Cut the total number of shelter facilities by almost 45% by vacating nearly 360 locations and replacing them with a smaller number of approximately 90 high quality borough-based shelters; and
3. Keep homeless people as close as possible to their own communities through a borough-based shelter approach that will, over time, enable DHS to offer shelter placements for homeless families and individuals in their home borough.

The City Plan will create a more equitable distribution of homeless services across the City, allowing homeless New Yorkers to remain in their communities and close to their networks of support, such as their schools, work, health care, social networks, and houses of worship. Also, the City Plan will enable the City to better serve its homeless population by phasing out the use of commercial hotel rooms and cluster apartment sites. Through implementation of this comprehensive approach, the City Plan has committed to enhance its community engagement efforts. The Plan provides for a clear shelter opening notification framework of at least 30 days prior to a shelter’s intended opening (as was done in this case), and requires each dedicated shelter to have a community advisory board that will take into account reasonable community concerns and input.

E. Meeting Shelter Demand through the Open-Ended RFP Process

The Agency ensures there is sufficient capacity to meet demand through the OERFP Process maintained by DHS and allowed under the City’s Procurement Policy Board (“PPB”) Rules. Through this process, non-profit organizations submit proposals in which they offer their services as shelter operators. DHS reviews and rates the proposals to determine whether it will enter into a contract for units and services proposed. After determining that a proposal and its location are suitable for shelter, DHS commences the procurement process, which entails multiple levels of review by various City agencies, such as the Mayor’s Office of Contracts, the Office of Management and Budget, the State Financial Control Board, and the Law Department. The process ends with the Comptroller’s registration of an executed contract. The procurement process also includes public review of the draft contract, including a public hearing and submission of a Fair Share Analysis. In this instance, DHS awarded the Contracts to WSFSSH pursuant to its OERFP for shelters.

II. FAIR SHARE ANALYSIS

The analysis below describes DHS's consideration of the Fair Share Criteria applicable to the use of the Sites.

Article 4: Criteria for Siting or Expanding Facilities

4.1(a) Compatibility of the facility with existing facilities and programs in the immediate vicinity of the site.

The Facilities are designed to provide a clean and safe environment for homeless single adults to receive temporary housing while they receive social services to assist them in obtaining permanent housing.

85th Street Facility

Within 400 feet of the temporary 85th Street Facility are multi-family elevator residential buildings, one and two family buildings, multi-family walk-up buildings, public facilities and institutions and mixed residential/commercial buildings. Specifically, east of the subject building towards West End Avenue are multi-family residential elevator buildings and one and two family buildings. Across West End Avenue there are multi-family residential walk-up buildings, multi-family elevator buildings and mixed residential and commercial uses. To the north of the site across West 85th Street there are multi-family residential walk-up buildings, multi-family elevator buildings, public facilities and institutions, and mixed commercial and residential buildings. To the south toward West 84th Street there are predominantly multi-family walk-up buildings. Across West 84th Street there are multi-family walk-up buildings, multi-family elevator buildings, and mixed residential and commercial buildings. To the west towards Riverside Drive there are multi-family elevator buildings and mixed commercial and residential buildings. Across Riverside Drive is open space and outdoor recreation.

108th Street Facility

Within 400 feet of the 108th Street Facility are parking facilities, open space and recreation, multi-family walk-up buildings, multi-family elevator buildings, transportation and utility facilities, mixed residential and commercial facilities, public facilities and institutions and industrial and manufacturing facilities. Specifically east of the current site towards Columbus Avenue there are parking facilities, open space and recreation and a mixed residential and commercial building. Across Columbus Avenue there are mixed residential and commercial buildings, multi-family walk-up buildings and transportation and utility buildings. To the north of the permanent current site toward West 109th Street are predominately multi-family walk-up buildings. Across 109th Street are multi-family elevator buildings and mixed residential and commercial buildings. To the west toward Amsterdam Avenue are parking facilities and multi-family walk-up buildings. Across Amsterdam Avenue are mixed residential and commercial buildings, multi-family walk-up buildings and public facilities and institutions. South across West 108th Street are public facilities and institutions, open space and outdoor recreation, and mixed residential and commercial buildings.

Both the 85th Street Facility and 108th Street Facility are located in Manhattan Community District 7. According to the New York City Department of City Planning/Community District 7 Profile, the mix of land uses in the project study area generally reflects the distribution of land uses that occur throughout CD 7. The most prominent land uses within CD 7 are multi-family elevator buildings, open space and outdoor recreation, mixed residential and commercial buildings, multi-family walk-up and public facilities and institutions. Both the temporary and permanent facilities will appear and operate like other residential buildings in the respective neighborhoods and, in the case of the permanent facility, the expanded facility will operate the same way that it currently operates.

Next, the Map and Facilities List, annexed to this Analysis as Exhibits A and B for the 85th Street Facility and Exhibits C and D for the 108th Street Facility, illustrate and name City and non-City facilities and residential/ambulatory programs within a 400-foot and half-mile radius of the Facilities. Specific to DHS shelter facilities, the Facilities are situated as follows:

85th Street Facility (excluding the current Valley Lodge at 108th Street)

- 400-foot radius: no DHS shelter facilities
- Half-mile radius: 3 DHS shelter facilities
 - 1 shelter for Single Adults
 - 1 shelter for Adult Families
 - 1 shelter for Families with Children

108th Street Facility (excluding the current Valley Lodge at 108th Street)

- 400-foot radius: no DHS shelter facilities
- Half-mile radius: 5 DHS shelter facilities
 - 1 Safe Haven
 - 1 Shelter for Single Adults
 - 3 Shelters for Families with Children

85th Street Facility/108th Street Facility

- CD 7: Both the 85th Street Facility and the 108th Street Facility are located in CD 7. These facilities will not change the number of shelter facilities within CD 7 because the current Valley Lodge shelter already exists, and the 85th Street Facility will serve as the temporary site for that shelter during construction. Including the Facilities, there are now (and will be) 8 DHS shelter facilities within CD 7 (Valley Lodge, 1 safe haven, 1 shelter for adult families, 2 shelters for single adults, and 3 shelters for families with children). There is currently 1 additional location in CD 7, a commercial hotel, that DHS uses to place homeless clients, but does not constitute a City Facility under the Fair Share Criteria, Article 3 (a) & (b), and is therefore not included in Exhibits A and B. Under the City Plan, the City will close the commercial hotel site in CD 7 by the end of 2023. As stated above, neither the 85th Street Facility nor the 108th Street Facility increases the concentration of shelter facilities in CD 7, as Valley Lodge has been operating at the 108th Street property since 1988.

As described through the above discussions, the use of the Facilities to provide temporary housing for homeless single adults is thus compatible and consistent with the immediate vicinities and surrounding areas of each facility, which includes residential buildings, public/institutional uses and mixed residential/commercial buildings.

4.1(b) Extent to which neighborhood character would be adversely affected by a concentration of City and/or non-City facilities.

Neighborhood character is generally described as the combined impression or effect of land use, physical form, social make-up and level of economic and traffic/pedestrian activity within a definable, cohesive district. The 85th Street Facility would appear and operate similarly to other transitional residences, which are found

throughout the City, and would be compatible with this neighborhood that has a mix of uses, including multi-family residential buildings. The 108th Street Facility will be situated in a broader project that includes not only the expanded Valley Lodge, but also 195 permanent affordable apartments, which will serve formerly homeless older adults in need of supportive housing as well as working singles and families. Additionally, the broader community will be able to utilize the public resources the project will offer, such as a 5,400 square foot community facility space, public restrooms directly accessible to children and parents in the adjacent Anibal Aviles Playground, and community room and spaces. This redeveloped space will be an integral component of West 108th Street and actively part of the residential character of the street.

Moreover, as discussed, the use of the Facilities is compatible with the respective immediate vicinity and surrounding neighborhood (half-mile radius) of each facility. Furthermore, the comprehensive social services programming, as well as the safety and security procedures implemented at each facility, will serve to minimize the potential for other adverse effects on the surrounding neighborhood. Finally, Valley Lodge has operated at 108th Street since 1988, and neither the temporary shelter at the 85th Street Facility nor the renovated 108th Street Facility will increase the concentration of City facilities in CD 7.

Therefore, the use of the Facilities to shelter homeless single adults is not expected to create or contribute to a concentration of like facilities that would adversely affect neighborhood character.

City and Non-City Facilities

As described above, both the 85th Street Facility and the 108th Street Facility are located in Manhattan CD 7. The prominent land uses for the CD 7, from largest to smallest include multi-family elevator buildings, open space and outdoor recreation, mixed residential and commercial buildings, multi-family walk-up and public facilities and institutions.

To determine whether the temporary Site would create or contribute to a concentration of facilities, DHS reviewed: the DCP's New York City's Owned and Leased Properties List; the *Citywide Statement of Needs for City Facilities/Fiscal Years 2017-2018* and *Comments on Citywide Statement of Needs for City Facilities/Fiscal Year 2017-2018*; DCPs' *City Planning Facilities Database (FacDB)*; and the *Fiscal Year 2017 Statement of Community District Needs and Community Board Budget Requests for Manhattan Community Board 7* ("District Needs Statement")².

85th Street Facility

The half-mile radius surrounding the 85th Street Facility extends from just east of the Hudson River Greenway in the Hudson River to the north, West 89th Street between Central Park West and Columbus Avenue to the east, Broadway between 75th Street and 76th Street to the south and the Hudson River to the west.

108th Street Facility

The half-mile radius surrounding the 108th Street Facility extends from Broadway between 116th and 120th Street to the north, Adam Clayton Powell Jr. Blvd. between West 113th and West 114th Street to the east, just south of West 100th street between Central Park West and Columbus Avenue to the south and the Hudson River to the west.

² The Fiscal Year 2017 Statement of Community District Needs and Community Board Budget Requests for Manhattan Community Board 7 ("District Needs Statement") can be found at http://www1.nyc.gov/assets/planning/download/pdf/community/community-portal/statement_needs/mn07_statement_2017.pdf

The Map and Facilities Lists for each Site (Exs. A and B for the 85th Street Facility and Exs. C and D for the 108th Street Facility) illustrate and name City and non-City facilities and residential/ambulatory programs within a half-mile radius of the Sites. The use of the both facilities is thus compatible and consistent with the respective areas within the surrounding neighborhood, which includes primarily small multi-family elevator buildings, open space and outdoor recreation, mixed residential and commercial buildings, multi-family walk-up and public facilities and institutions. Therefore, the temporary use of the Facility to shelter homeless single adults will not significantly alter the concentration of like facilities in the area or have an adverse effect on the surrounding neighborhood.

Program Staffing

WSFSSH has a comprehensive and fully-staffed social services program in place at Valley Lodge that will transition to the 85th Street Facility and then, after construction and renovation, return to the 108th Street Facility. All staff performance is closely monitored and all staff receive continued training for their positions. This program is described as follows.

The Director and Associate Director will be responsible for the overall operation of the shelter, including compliance with all appropriate regulations. The Administrative Assistant will perform a variety of administrative and clerical tasks and assist residents with money management. WFSSSH will employ a social service team, which will be comprised of a Clinical Coordinator and caseworkers. Each caseworker will have a caseload of approximately 10-20 residents.

As discussed in Section I.B., WFSSSH will provide a full-time nurse who will assist clients with medical matters and health services, weekly, from 8:30am to 4:30pm, from Monday through Friday, except that on Thursday, the nurse will be available to clients from 11:30am to 7:30pm. Additionally, WFSSSH will provide two full-time Certified Nursing Assistants and two full-time Licensed Nurse Practitioners to assist clients from 8:00am to 4:00pm, seven days per week.

As described above in Sections I.A. and I.C., and in this Section, the provision of on-site services with adequate and appropriate staff will serve to minimize any impact on the surrounding neighborhood.

Safety and Security Plan/Enforcing Site Rules

Recognizing the vital importance of maintaining security at all times, the comprehensive security plan for both facilities is designed to provide a safe environment for all residents, staff, and visitors. WFSSSH will ensure 24 hour, 7 days-a-week staffing. The front desk will have a staff member present at all times. This person controls entry to the building, answers emergency calls from residents, monitors who enters and leaves the building, and monitors all security and fire equipment. Monday through Friday, during peak business hours, the desk is covered by a program aide who specializes in these responsibilities. In addition to the front desk staff person, there will be at least 3 other persons in the building at all times. From 11pm-7pm regular top to bottom building rounds are conducted. The buildings will have regular fire drills, in accordance with DHS and FDNY regulations. There will be a two-way call system, so that front desk can make announcements throughout the common areas of the building and so that residents upstairs in residential areas can contact the front desk for both emergencies and routine communications.

Shift Supervisors and Program Aides will provide supervision, advocacy and escort services to residents. The Shift Supervisors each have over 20 years of experience in this role. Program aides are available to assist residents in activities of daily living, when needed.

This security plan is in line with the current plan at Valley Lodge, which has been reviewed by NYPD to ensure sufficient security staff on-site and at all times. The NYPD Security Management team has been working with DHS since April 2016 and has implemented a crime prevention reporting system and a daily risk assessment report; created an assessment instrument for staffing deployment at shelter facilities; conducted specialized training for DHS Peace Officers; instituted procedures for conducting searches in shelters; and upgraded security at hotels covered by private security guards.

Pursuant to contractual obligations, all program staff is responsible for reinforcing all shelter rules and DHS procedures, including adherence to an evening curfew (10 p.m.), which are designed to ensure safety and order. Rules and procedures are discussed with clients upon initial entry, and adherence to rules and procedures is reinforced in the course of case management discussions. In addition, all shelter clients are subject to discontinuance of shelter if they engage in illegal, dangerous, or disruptive conduct. In sum, the comprehensive safety and security procedures implemented at the Site serve to minimize potential adverse effects on the surrounding neighborhood.

4.1(c) Suitability of Site to provide efficient and cost-effective delivery of the intended services.

DHS faces a number of challenges in locating appropriate facilities for use as shelters throughout New York City. One such challenge is ensuring the facility can provide efficient and cost-effective delivery of the intended services. Whether a facility will meet these criteria involves having sufficient space for residents to achieve economies of scale and a fully-staffed social services and security program.

The total area of the 85th Street Facility is approximately 51,520 square feet, which provides sufficient space to shelter up 92 homeless single adults. This facility also includes sufficient space for the provision of a variety of on-site services, including case management, re-housing assistance, and other support services. Additional services are provided through linkages with other programs and community-based organizations. The size of this facility and the availability of on-site social services generate economies of scale in personnel costs for the provision of supportive services and fixed costs related to building maintenance and operation.

The 108th Street Facility will be situated within a building expected to be about 193,000 gross square feet, of which 80% will be permanent housing, 16% will be the shelter, and 4% will be a Federally Qualified Health Center and other spaces dedicated to the community. There will be about 9,000 square feet of rear yard accessible to residents of the building, including a private outside area for shelter clients. Moreover, within the building, the ability to share common program areas with permanent housing (social service and management options, dining, some activity spaces) increases cost efficiencies, in addition to social benefits.

Moreover, the contract rate to be paid to WSFSSH is within the range of rates that DHS pays to other social service providers operating similar programs. As further discussed in Sections II.4.1(d) and II.6.1(d) below, the Site's proximity to public transportation and major thoroughfares allow its residents and staff to access the Site in a convenient and cost-effective manner.

Finally, both facilities assist DHS in achieving a key goal of the City Plan, which is to end the use of cluster apartment sites by 2021 and commercial hotel rooms by 2023. The combination of commercial hotel rooms and cluster apartments are significantly more costly to rent than traditional shelter. Moreover, dedicated shelters are better able to provide appropriate social services to the homeless than commercial hotel rooms or cluster apartments.

Therefore, the Facilities are well-suited for providing cost-effective services to homeless single adults.

4.1(d) Consistency with criteria in Statement of Need or in a submission to the Borough President.

The *Citywide Statement of Needs for City Facilities/Fiscal Years 2017-2018* identified the following criterion for the siting of new and existing Transitional Facilities for Homeless Individuals and Families:

- Access to public transportation.

The location of the Facilities is consistent with this criterion. As described in Section II-6.1(d) below, the Site is served by several Metropolitan Transportation Authority (“MTA”) bus and subway lines, which allows clients and staff to travel to and from the Site with ease.

4.1(e) Consistency with any plan adopted pursuant to Section 197-a of the Charter.

There are no adopted 197-a plans applicable to either of the areas in which the facilities are located.

4.2(a) Consideration of the Mayor’s and Borough President’s Strategic Policy Statement and Community Board’s Statement of District Needs.

There is no recent Strategic Policy Statement from the Manhattan Borough President.

In its District Needs Statement, Manhattan Community Board 7 (“CB 7”) requested increased funding for the DHS Homebase Program and supporting housing. The statement specifically pointed out the need for the provision of more supportive housing for seniors.

WSFSSH's operation of these Facilities and the City’s multi-faceted plan for homelessness will continue to address the concerns raised by the residents of CD 7. Under the Contracts, WSFSSH will administer a service-rich, housing-focused program that emphasizes placing clients into permanent housing and teaches independent living skills to help clients remain stably housed. Moreover, WSFSSH will be operating permanent, affordable housing at the 108th Street site which will offer supportive housing to seniors.

Moreover, the City continues to prioritize homelessness prevention, outreach, and the placement of homeless families and individuals into permanent housing through programs as part of its comprehensive strategy to reduce the number of homeless individuals and the need for a number of shelters, including those located in CD 7. And, as stated, the City Plan will reduce the number of shelter facilities in the City by 45% by replacing 360 shelter facilities with a much smaller number of 90 new high quality shelters. And specific to CD 7, there will be a net reduction of 100 beds through closures of sites this year and during the implementation of the City Plan.

Regarding prevention, the City has increased investment in the Homebase program, a community based social services program which aims to prevent homelessness, as well as tenant legal assistance. Evictions have decreased by 24% since 2014, when the City expanded available legal services.

Regarding housing and the siting of homeless facilities, the City's rental assistance and rehousing programs have enabled more than 51,500 New Yorkers to move out of or avert entry into City shelters from summer 2014 through December 2016 and an additional 13,005 so far this year. Additionally, in 2015, the United States Department of Housing and Urban Development certified that the City ended chronic veteran homelessness. Over three years, the City placed 3,153 homeless veterans into permanent housing and reduced the overall number of homeless veterans by two-thirds. Moreover, in January 2016, the City launched a task force to create 15,000 units of permanent, affordable supportive housing. To date, the City has awarded contracts to 11 organizations for the development of 550 units of permanent, affordable supportive housing this year.

Regarding outreach and social services for vulnerable populations, the City began implementation of HOME-STAT. Partnering with existing homeless response and prevention programs across multiple City agencies (DHS, HRA, NYPD), HOME-STAT is the most comprehensive street homelessness outreach effort ever deployed in a major U.S. city. HOME-STAT increases the City's ability to identify homeless individuals on the street from Canal Street to 145th Street and in other hot spots, and deploy outreach resources (social services, medical and benefits assistance) where they are needed most. Last year, the City moved 865 street homeless individuals into transitional programs or permanent housing.

While DHS strongly believes these initiatives and programs will ultimately reduce the demand for and reliance on the City's shelter system, DHS must continue to ensure that it has enough capacity to meet its legal obligations on an immediate basis. DHS will continue to respond and remediate the concerns regarding the siting of shelter facilities raised by the CB 7. All DHS shelter contracts require shelter providers to regularly convene a CAB (*See* Section I.C.(1) above).

4.2(b) Meetings, consultation or communications with the Community Board and/or Borough President.

In early April 2017, the City notified, by telephone, elected and community representatives of the proposed Facilities. Public hearings concerning the Contracts were held on June 14, 2016 (108th Street Facility) and on April 20, 2017 (85th Street Facility). Advance notice of the hearings' dates, times, and locations were advertised in the City Record. In addition, prior to the public hearing, drafts of the proposed Contracts were available at DHS's offices for public review.

Moreover, WSFSSH held numerous meetings with community members, the community board and elected officials to discuss the shelter and the broader WSFSSH housing project.

WSFSSH met with members of Community Board 7 on:

- December 16, 2015;
- March 16, 2016;
- June 15, 2016; and
- June 22, 2017.

WSFSSH met with various local community groups on:

- July 20, 2015;
- October 8, 2015;
- January 19, 2016;

- March 11, 2016;
- May 17, 2016;
- June 3, 2016;
- September 27, 2016; and
- November 10, 2016.

Finally, WSFSSH met with elected officials—including Councilmember Levine and the Manhattan Borough President’s Office—on:

- July 1, 2016;
- July 22, 2016;
- September 2, 2016;
- January 5, 2017;
- March 8, 2017; and
- September 27, 2017.

See Exhibit E for the complete list of all meetings regarding the Facilities.

In addition to the above notification, public hearings and meeting, DHS will deliver copies of this fair share notification to DCP, the Borough President, CB 7 and the elected representatives of the district in which this Site is located.

Article 6: Criteria for Siting or Expanding Regional/Citywide Facilities

6.1(a) Need for the Facility.

As discussed in Sections I.D. and I.E., the City of New York is mandated by law and court order to provide temporary housing to every eligible homeless family and individual on an immediate basis. The number of homeless individuals and families applying for shelter has been high in recent years and that trend continues to date.

Moreover, the City Plan seeks a cessation of all cluster units by 2021 and all commercial hotel units by 2023. This will result in a Citywide reduction of 45% of the total number of buildings used to shelter homeless individuals and families by vacating nearly 360 locations and replacing them with a smaller number of approximately 90 high-quality borough-based shelters.

Use of the 85th Street Facility during renovation of Valley Lodge and the adjacent properties ensures that DHS does not lose any single adult capacity. And, the renovated 108th Street Facility will not only increase shelter capacity by 18 beds, but will be situated in a building housing 195 apartments, 115 of which are reserved for older, homeless adults through HPD’s Supportive Housing Loan Program, and 60% of those units will be residents initially referred by Valley Lodge.

The need for additional capacity and for the creation of additional permanent housing options is critical. These Facilities meet that critical need.

6.1(b) Distribution of similar facilities throughout the City.

The DHS shelter system is comprised of shelters for homeless families with children, adult families, and single adults. DHS shelters are located in every borough throughout the City and most Community Districts as follows: 28% of all shelters are in Manhattan, 32% are in the Bronx, 28% are in Brooklyn, 10% are in Queens, and 1% are in Staten Island. With respect to single adult shelter facilities, 19% are located in the Bronx, 33% are in Brooklyn, 38% are in Manhattan, 10% are in Queens, and 1% are located in Staten Island.

85th Street Facility

As stated, there are no DHS shelter facilities within a 400-foot radius of the 85th Street Facility. There are 3 DHS facilities within a half-mile radius of this site: 1 shelter for adult families, 1 shelter for single adults, and 1 shelter for families with children.

108th Street Facility

As stated, there are also no DHS shelter facilities within a 400-foot radius of the 108th Street Facility. There are 5 DHS facilities within a half-mile radius of this site: 1 Safe Haven, 1 shelter for single adults and 3 shelters for families with children.

CD 7: Including these sites, with the current and temporary counted as 1, there are 8 DHS facilities within CD 7 (the Site, 1 Safe Haven, 1 shelter for adult families, 2 shelters for single adults, and 3 shelters for families with children). There is currently 1 additional location in CD 7 that DHS uses to place homeless clients, but does not constitute a City Facility under the Fair Share Criteria, Article 3 (a) & (b), and is therefore not included in Exhibits A, B, C and D. Under the City Plan the City will close the commercial hotel sites in CD 7 by the end of 2023. Notably, neither the 85th Street Facility nor the 108th Street Facility increases the concentration of shelter facilities in CD 7, as Valley Lodge has been operating at the 108th Street property since 1988.

6.1(c) Size of the Facility.

In determining the appropriate capacity for the Facilities, DHS and WSFSSH considered the number of persons who could appropriately be housed in the space available at each site with adequate support services and on-site staff, while maintaining economies of scale. DHS and WSFSSH determined that the 85th Street Facility and the 108th Street Facility can properly accommodate up to 92 homeless single adults and 110 homeless adults, respectively, which, with the social services and security program achieve a cost effective and efficient delivery of services.

6.1(d) Adequacy of the streets and transit.

The 85th Street Facility will be served by the “1” train at the 86th Street Station, “2” and “3” trains at the 96th Street station, and by nearby bus lines, including the M5, M7, M11 and M86.

The 108th Street Facility is and will be served by the “B” and “C” trains at the 109th and Central Park West station, the “1” train at the 110th street and Broadway station, and nearby bus lines, including M7, M11, M104, M116, M4, M10 and M60 select service.

6.51 Concentration of facilities providing similar services.

DHS does not anticipate any significant cumulative negative impact on neighborhood character by use of either site, nor would such use contribute to a concentration of facilities that provide similar services.

85th Street Facility

There are no DHS shelter facilities within a 400-foot radius of the 85th Street Facility. There are 3 DHS facilities within a half-mile radius of this site: 1 shelter for adult families, 1 shelter for single adults, and 1 shelter for families with children.

108th Street Facility

There are no DHS shelter facilities within a 400-foot radius of the 108th Street Facility. There are 5 DHS facilities within a half-mile radius of this site: 1 Safe Haven, 1 shelter for single adults, and 3 shelters for families with children.

CD 7: Including these sites, with the current and temporary counted as 1, there are 8 DHS facilities within CD 7 (the Site, 1 Safe Haven, 1 shelter for adult families, 2 shelters for single adults, and 3 shelters for families with children). There is currently 1 additional location in CD 7 that DHS uses to place homeless clients, but does not constitute a City Facility under the Fair Share Criteria, Article 3 (a) & (b), and is therefore not included in Exhibits A,B, C and D. Under the City Plan, the City will close the commercial hotel sites in CD 7 by the end of 2023. Notably, neither the 85th Street Facility nor the 108th Street Facility increases the concentration of shelter facilities in CD 7, as Valley Lodge has been operating at the 108th Street property since 1988.

Therefore, the use of the Facilities to shelter homeless single adults is not expected to increase the number of shelters in CD 7.

As described in Sections I.A.C and II.4.2(b), WSFSSH's range of on-site social services and security measures serve to minimize any potential impact on neighborhood character. Finally, as discussed in Sections II.4.1(a)-(b), the use of the Facilities as housing for homeless single adults fits within the context of the neighborhood.

6.52 Necessary support services for the Facility and its residents should be available and provided.

WSFSSH will provide on-site services to homeless single adults at the Facilities in accordance with its contractual obligations. As discussed in Section II.4.1(b), the Facilities will be adequately staffed to provide clients with the services they need to exit the shelter and move into permanent housing as expeditiously as possible.

As discussed in Section I.C. above, DHS oversees and monitors WSFSSH's performance through regular communication between DHS and WSFSSH program staff, site inspections, and performance reviews. WSFSSH is also subject to audits by DHS' internal Audit Services and City and State Comptrollers, and subject to State oversight by OTDA, including annual inspections.

6.53(a) Whether the Facility in combination with other similar City and non-City facilities within a half-mile radius would have a significant cumulative negative impact on neighborhood character.

The *2015 List of Selected Facilities and Program Sites in New York City*, issued by DCP, contains ratios of residential facility beds to population in New York City, its boroughs, and Community Districts. Residential facility beds considered in this analysis are those in facilities on the Map and Facilities Lists. The Maps for the facilities (Ex. A and C) illustrate all residential and community facilities identified by DCP within a half-mile of each building, while the Facilities Lists (Ex. B and D) list these facilities and their capacities. Residential facility beds include: Correctional Facilities, Nursing Homes and Residential Health Care Facilities, Small Residential

Facilities (under 25 beds), and Large Residential Care Facilities (serving 25 people or more). Manhattan CD 7 ranks 24 out of a total of 59 Community Districts Citywide for the number of beds in all residential facilities. The Citywide average ratio is 18.4 residential care facility beds per 1,000 people – CD 7 has a ratio of 19.5. However, as the Facilities are replacing current capacity, with only a future increase of 18 beds, this should not affect the concentration of residential beds in the CD.

Also, as discussed in Sections I.B., I.D., and II.4.1.(b), WSFSSH will provide a range of social services, including, but not limited to, housing placement services, vocational training and benefits assistance. Moreover, the comprehensive safety and security procedures to be implemented at both sites have been reviewed and approved by the NYPD. This social services and security program, as well as community interactions via the CAB and GNP, serve to minimize, if not eliminate, either site's impact on the community.

Moreover, as discussed in Sections II.4.1 (a)-(b) and 6.51, it is not expected that the Facilities will have any significant cumulative negative impact on neighborhood character. The existence of compatible uses in the immediate vicinity and surrounding area of each of the sites, such as multi-family residences and community facilities such as schools, group care centers and food pantries serve to minimize the impact, if any, on neighborhood character. The use of each of these sites as temporary housing for homeless single adults fits within the context of the neighborhood.

Therefore, DHS does not anticipate that its use of the Facilities will have a significant cumulative negative impact on neighborhood character.

6.53(b) Whether the Site is well located for efficient service delivery.

As discussed in Sections II.4.1(c), 6.1(d), and 6.52, the Facilities are well located for efficient and cost-effective service delivery.

6.53(c) Whether any alternative sites considered, which are in Community Districts with lower ratios of residential facility beds to population than the Citywide average, would add significantly to the cost of constructing or operating for the facility or would impair service delivery.

As noted above, DHS's ability to choose among alternative sites is limited, and the process of looking for, and successfully finding, shelter space is complex, driven by factors beyond the City's control such as economic conditions, increases in shelter demand that often cannot be accurately predicted many months in advance, the availability of suitable space at any given point in time, and the City's seven to nine-month average procurement process. The City's legal mandate to shelter every homeless individual and family on an immediate basis further complicates the weighing of factors in determining sites for shelter use. Moreover, all shelters, among other things, must meet applicable State and local laws and regulations, be of an appropriate size and configuration and accessible to public transportation, and comply with local zoning requirements.

Thus, in order to ensure sufficient shelter to meet demand, and also to implement the goals of the City Plan to end the use of cluster units by 2021 and commercial hotels by 2023, DHS is, at any given time, negotiating with various providers for the provision of services to homeless families and individuals. Since the City released the City Plan on February 28, 2017, the Agency considered a total of 39 proposed sites, of various types, used to shelter homeless single adults throughout the City.

DHS was even more limited in its ability to choose an alternative site here because it needed a place to temporarily relocate and shelter homeless single adults within the same neighborhood in order to minimize disruption to residents and staff while construction and renovation at Valley Lodge and its surrounding properties are expected to take place for a period of approximately three years.

Notified Sites

Of the 39 sites considered, DHS has notified on 8 sites for single adults, of which 5 are open (as marked with an asterisk below). The notified sites located throughout the City are as follows: 3 in the Bronx, 2 in Manhattan, 2 in Brooklyn, and 1 in Queens:

- **Bronx**
 - Marsha's House* (BX6)
 - Landing Road (BX7)³
 - 1790 Marmion* (BX6)
- **Manhattan**
 - 14th St. Drop-in and Safe Haven (MN2)
 - Valley Lodge Replacement (85th Street Facility) (MN7)
- **Brooklyn**
 - 174 Prospect Place* (BK8)
 - 1173 Bergen Street* (BK8)
- **Queens**
 - Queens Drop-in* (QN9)

Sites Removed from Consideration

Of the 39 sites initially considered, DHS removed from consideration proposals for 31 sites. Of those 31 sites, 19 sites were in Community Districts with above average bed ratios and 12 of them were in Community Districts with below-average bed ratios using DCP's *2015 List of Selected Facilities and Program Sites in New York City*.

These 31 sites were removed from consideration for various reasons, including: the proposed shelter provider lost site control (*e.g.*, the building owner/landlord decided to lease the building for non-shelter use); operation of the site as a shelter would be too costly (*e.g.*, cost of converting building to suitable shelter space would be prohibitive or an efficient service delivery model achieving an economy of scale could not be realized); the proposed building was not viable for shelter use (*e.g.*, zoning or use restrictions, building conditions, or, safety concerns such as suitable means of egress), proximity to existing sites or lack of proximity to transportation or community supports, or the time period necessary to ready the site for shelter use was too lengthy (*e.g.*, 12-24 months) to complete. Broadly speaking, the primary reasons for site rejection fall into three main categories: site control, viability, and proximity.

The proposals removed from consideration, and the main reasons for such removal, are as follows:

³ Contract registered, but awaiting amended certificate of occupancy prior to shelter use.

Community District	2015 Bed Ratio for All Residential Care Facilities	Citywide Ranking	Primary Reason for Proposal Removal
• Bronx			
BX1	27.2	14	Viability
BX1	27.2	14	Viability
BX1	27.2	14	Viability
BX6	38.6	7	Viability
BX6	38.6	7	Viability
BX6	38.6	7	Proximity
BX7	17.6	31	Viability
BX7	17.6	31	Viability
BX7	17.6	31	Proximity
BX7	17.6	31	Proximity
• Brooklyn			
BK1	8.5	49	Viability
BK2	45.7	5	Site Control
BK5	18.7	26	Viability
BK7	22.2	20	Viability
BK7	22.2	20	Viability
BK8	24.5	15	Site Control
BK13	19.0	25	Viability
BK14	8.9	46	Viability
BK16	44.9	6	Proximity
BK17	10.5	42	Proximity
• Manhattan			
MN5	23.9	16	Viability
MN10	32.4	10	Proximity
MN10	32.4	10	Proximity
MN10	32.4	10	Viability
MN11	53.4	2	Viability
MN11	53.4	2	Viability

- **Queens**

QN2	12.4	40	Viability
QN9	6.2	54	Site control
QN12	18.3	28	Site Control
QN12	18.3	28	Viability

- **Staten Island**

SI1	16.0	32	Proximity
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These 31 proposals removed from consideration are located throughout the City as follows: 10 are in the Bronx, 10 are in Brooklyn, 6 are in Manhattan, 4 are in Queens, and 1 is in Staten Island.

The above analysis demonstrates that the process of looking for and successfully finding shelter space is complex, driven by factors beyond the City's control such as economic conditions, increases in shelter demand that often cannot be accurately predicted many months in advance, the availability of suitable space at any given point in time, and the City's seven- to nine-month average procurement process. The City's legal mandate to shelter every homeless family and individual on an immediate basis further complicates the weighing of factors in determining sites for shelter use. (*See* Sections I.D., I.E. and II.6.1(a)-(b).)

For all of these reasons, DHS's ability to choose among alternative sites is limited. In sum, the distribution of shelters among Community Districts must be viewed in this particular context.

III. SUMMARY STATEMENT

In proposing to shelter homeless single adults at the Facilities, DHS carefully considered such factors as the community's needs for services, the efficient and cost-effective delivery of services, the concentration of similar facilities in CD 7, and the effects of the Site on neighborhood character. As previously stated, the law requires DHS to shelter all homeless individuals and families on an immediate basis. DHS must meet fluctuations in shelter demand caused by economic and other factors outside its control. DHS must therefore

ensure the availability of sufficient temporary, emergency shelter spaces and be able to accurately predict future capacity needs. Given the City's legal obligation, DHS has an immediate need for all immediately available and suitable space for its clients, including the Site. As demonstrated in this Fair Share Analysis, DHS has determined that its use of the Site pursuant to the Contract is appropriate and consistent with the Criteria for the Location of City Facilities.

Sincerely,

A handwritten signature in black ink, appearing to read 'S Banks', with a stylized, cursive script.

Steven Banks

Attachments: 2

cc: Herminia Palacio, Deputy Mayor, Health and Human Services
Melissa Mark-Viverito, New York City Council Speaker
Gale Brewer, Manhattan Borough President
Adriano Espaillat, Member, U.S. House of Representatives
Brian Benjamin, State Senator
Daniel J. O'Donnell, State Assembly Member
Mark Levine, City Council Member
Roberta Semer, Chair, Manhattan Community Board 7
Penny Ryan, District Manager, Manhattan Community Board 7
Marisa Lago, Chair, Department of City Planning
Martha Calhoun, DSS General Counsel
David Neustadt, DSS Deputy Commissioner, Communications,
Marketing & Legislative Affairs
Jackie Bray, DSS First Deputy Commissioner
Joslyn Carter, DHS Administrator
Iris Rodriguez, DHS Associate Commissioner, Adult Services
Matthew Borden, DSS Assistant Commissioner, Government Relations