
Appendix 5: Written Comments on the DEIS



OFFICE OF THE PRESIDENT
BOROUGH OF MANHATTAN
THE CITY OF NEW YORK

1 Centre Street, 19th floor, New York, NY 10007
(212) 669-8300 p (212) 669-4306 f
431 West 125th Street, New York, NY 10027
(212) 531-1609 p (212) 531-4615 f
www.manhattanbp.nyc.gov

Gale A. Brewer, Borough President

November 18, 2019

Recommendation on

ULURP Applications: N200064ZMM, N200065ZRM, N200067ZAM, M790721(B)ZSM

GO Broome Street Project by Applicants:

Go Broome LLC and the Chinatown Planning Council Housing Development Fund Company. Inc. (CPC-HDFC)

I. PROPOSED ACTIONS

GO Broome LLC and the Chinatown Planning Council Housing Development Fund Company, Inc. ("CPC-HDFC") (collectively the "Applicants") are seeking Uniform Land Use Review Procedure (ULURP) approvals by the City Planning Commission ("the Commission") for the following Proposed Actions:

- (1) A zoning map amendment to change an R8 to an R9-1 district with a C2-5 overlay (Application 200064ZMM);
- (2) A zoning text amendment to Appendix F of the Zoning Resolution (ZR) to designate a Mandatory Inclusionary Housing (MIH) Area and to ZR Sections 23-011, 28-01, and 78-03 to allow use of the Quality Housing Program (Application N 200065ZRM);
- (3) Authorization pursuant to ZR Section 13-443 to eliminate the 33 spaces of required accessory off-street parking on Block 346, Lot 75 via special permit (Application N200067ZAM); and
- (4) A modification (Application M790721(B)ZSM) of the Seward Park Extension West Large-Scale Residential Development (the "LSRD") to update the site plan and changes to the zoning lots, including:
 - An authorization to modify the regulations governing height and setback regarding the existing Hong Ning building;
 - A special permit to allow for the distribution of floor area without regard to zoning lot lines;
 - A special permit to modify regulations governing height and setback along streets, with respect to the Proposed Development and the Hong Ning building; and
 - A special permit to modify the minimum distance between buildings on a zoning lot.

The Project Area is located in Manhattan's Lower East Side neighborhood in Community District 3 (CD3) and is bounded by Broome Street to its north, Grand Street to its south, Suffolk Street to its east, and Essex Street to its west. The Proposed Development will include mixed-income housing, affordable senior housing, program and office space for the Chinese-American Planning Council, congregation space for the landmarked Beth Hamedrash Hagodol ("BHH") Synagogue, and commercial retail uses. The Project Site consists of Block 346, Lots 1, 37, 75, and 95, and Block 351, Lot 1.

Table 1: Project Site Tax Block, Tax Lot, Address, Owner and Project Parcel

| Tax Block | Tax Lot | Address or Bounding Streets/Cross Streets | Owner | Project Parcel |
|------------------|----------------|--|---|-----------------------|
| 346 | 1 | 50 Norfolk Street | 384 Grand Street Housing Development Fund Company, Inc. | 2A-1 |
| 346 | 37 | 60 Norfolk Street | Beth Hamedrash Hagodol of New York Restoration, Inc. | 2A-1 |
| 346 | 75 | N/A Norfolk Street (Broome Street between Norfolk and Suffolk Streets) | CPC-HDFC | 2A-1 |
| 346 | 95 | 384 Grand Street | 384 Grand Street Housing Development Fund Company, Inc. | 2A-2 |
| 351 | 1 | 62 Essex Street | New York City Housing Authority | 1 |

Through this application, the modified LSRD of the Project Area would be comprised of areas:

- Seward Park Extension West Large Scale Residential Development (which is the LSRD that is the subject of the Proposed Actions in this application), consisting of Block 351, Lot 1 and Block 346, Lots 1, 75, and 95; and
- Seward Park Extension East Large-Scale Residential Development, consisting of Block 341, Lots 1, 58, and 70; Block 347, Lot 80; Block 336, Lots 1, 5, 35, and a portion of 28.

The proposed Actions would facilitate the development of two new buildings (the “Proposed Development”) on the portion of Parcel 2A-1 (the “Development Site”). One of the buildings would consist of Affordable Independent Residences for Seniors (“AIRS”) at Norfolk and Broome Streets (the “Norfolk Building”), and the other would consist of a mixed-use, mixed-income contextual high-rise building on Suffolk and Broome Streets (the “Suffolk Building”).

II. PROJECT BACKGROUND

Seward Park Extension Urban Renewal Area

The Seward Park Extension Urban Renewal Area (“SPEURA”) was approved by the City Planning Commission on June 2, 1965, and by the Board of Estimate on July 22, 1965 (CP-18915). The SPEURA planned to develop 1,800 residential units along with community facilities and commercial uses within the 14 blocks bounded by Delancey, Essex, Willet, and Grand Streets. This area originally had low-rise tenement buildings with ground floor commercial uses. Originally, the SPEURA plan intended to convert a handful of blocks into superblocks, one of which included the Project Site through the elimination of Suffolk Street between Broome and Grand Streets. Block 346, Lots 1, 75, and 95 were meant to become one superblock; however this merge never took place.

The City Planning Commission approved the first amendment to the SPEURA plan on February 25, 1980 (C790719HUM), which, among other approvals, split Parcel 2 in the SPEURA plan into “Parcel 2A” and “Parcel 2B.” Parcel 2A now consists of Block 346, Lots 1, 75, and 95 and Parcel 2B consists of Block 346, Lots 39 and 1001-1005 (outside of the Project Area).

The SPEURA plan expired on July 22, 2005 and on October 11, 2012, the New York City Council approved the Seward Park Mixed-Use Development Project, commonly known as Essex Crossing. At the time of completion, Essex Crossing will be about 1.65 million square feet including over 1,000 new residences, 450,000 square feet of retail space, and 400,000 square feet of office space.

HPD is seeking approval of a corrective action that would remove an overlapping portion on Block 346 by splitting the Seward Park Extension LSRD into two non-contiguous developments. Seward Park Extension West LSRD, where the overlap is, will consist of Block 351, Lot 1 and Block 346, Lots 1, 75, and 95. Seward Park Extension East LSRD will consist of Block 341, Lots 1, 58, and 70; Block 347, Lot 80; Block 336, Lots 1, 5, 35, and 28.

Hong Ning Senior Housing Building (Block 346, Lot 1)

New York City Housing Preservation and Development (“HPD”) applied to develop the 14-story Hong Ning senior housing building on Block 346, Lot 1, which included the (1) disposition of Parcel 2A to the CPC-HDC and (2) an authorization under ZR Section 78-311(e)(Authorization by Commission) for the location of the building without regard to the height and setback regulations and special permit under ZR Section 78-312(d)(Special permits by the City Planning Commission) for minor variations in the front, height, and setback regulations. This application was approved by the City Planning Commission on March 12, 1980 (C790720HDM and N790721ZSM) and the Board of Estimate on April 24, 1980. The building was completed in 1982.

Lot 1 has an area of approximately 19,483 square feet and is operated by the CPC-HDFC, an affiliate of the Chinese-American Planning Council (CPC). The Hong Ning building contains 156 units and is a height of approximately 126 feet.

Beth Hamedrash Hagadol (BHH) Synagogue (Block 346, Lot 37: Parcel 2A-1)

The former Beth Hamedrash Hagadol (BHH) Synagogue, on Block 346, Lot 37 was one parcel that was not acquired as part of the SPEURA plan. The BHH Synagogue was completed in 1850 and was individually landmarked by the Landmarks Preservation Commission on February 28, 1967 (LP-0637) and reviewed by the City Planning Commission on March 2, 1967 (CP-19758). In May 2017 a fire severely damaged the building, rendering the building inhabitable but leaving a portion of the façade wall to be preserved through the Proposed Development. In October 2019 a portion of the wall collapsed, killing Stanislaw Supinski, a construction worker, and injuring his colleague and will no longer be preserved in the Proposed Development. Lot 37 is part of the Projected Development Site 1 and has an area of approximately 7,443 square feet.

Accessory Parking (Block 346, Lot 75: Parcel 2A-1)

Lot 75 is owned by CPC-HDFC and currently operates as a 33-space accessory parking lot for the Hong Ning senior housing building (located on Block 346, Lot 1). Lot 75 is part of the Proposed Development Site 1 with an area of approximately 24,958 square feet.

Five-Story Mixed-Use Commercial Building (Block 346, Lot 95)

Lot 95 has an area of approximately 8,637 square feet and has a 5-story mixed use building constructed in the early 1920s. The building includes ground-floor commercial use with 26 residential units on its upper floors and a height of approximately 55 feet. The lot continues to remain a part of the LSRD.

NYCHA Building (Block 351, Lot 1)

The New York City Housing Authority (“NYCHA”) applied to create the Seward Park Extension Large Scale

Residential Development (the “Original LSRD”) within the SPEURA. The application was approved by the City Planning Commission on May 11, 1966 and by the Board of Estimate on May 20, 1966.

The Original LSRD facilitated the development of the 23-story NYCHA building on Block 351, Lot 1 which was completed in 1972. The site is a full-block site owned and operated by NYCHA with an area of approximately 47,056 square feet. In addition to the 23-story residential building at the north end of the block, this area also includes a low-rise community facility building at the south end of the block with a substantial amount of open space. No changes are proposed to this parcel as part of the Proposed Actions.

III. AREA CONTEXT

The Project Area is situated in Manhattan’s Community District 3 on the Lower East Side and covers two blocks that are bounded by Broome Street to the north, Grand Street to the south, Suffolk Street to the east, and Essex Street to the west. The Project Area is zoned R8.

The surrounding area has three distinct built characteristics: (1) the “tower-in-the-park” style; (2) the mixed-use lower-scale area which predominately consists of four- to six-story tenement style residential buildings with ground-floor retail developed in the late 19th and early 20th centuries; and (3) Essex Crossing, which includes separate parcels with contextual mix-rise and high-rise new construction directly to the east, north and northwest of the Project Area.

The Project Area is well served by public transportation, which includes access to the M9, M14A, M14D, M15, M21, M22, and B39 bus routes. The F, M, J and Z subway lines stop at the Delancey Street/Essex Street subway station, with a number of entrances along Delancey and Essex Streets. In addition, Delancey Street serves as the primary east-west route through the area and provides direct access to and from the Williamsburg Bridge.

IV. PROPOSED DEVELOPMENT

Parcel 2A-1 Residential Uses: The Norfolk and Suffolk Buildings

Parcel 2A-1 consists of Block 346, Lots 37 and 75, and is approximately 32,401 square feet. The Suffolk Building and the Norfolk Building are both to be constructed on this block and are to consist of mixed-income housing, affordable senior housing, CPC programmatic and office space, a BHH Synagogue community facility and cultural center, and retail uses. The two buildings would be linked by a landscaped interior courtyard.

The Suffolk Building would be a 30-story, 310-foot tall mixed-use, high-rise building totaling approximately 375,431 square feet. There will be about 316,421 square feet of residential space, about 40,222 square feet of community facility space that will be owned by CPC, and about 18,788 square feet of neighborhood retail space facing Broome Street. While the numbers have not yet been finalized, there are presently a total of 373 units planned for the Suffolk Building. Of this total, there are 280 market-rate units and 93 Mandatory Inclusionary Housing (MIH) units under MIH Option 1 proposed for the site. The 93 MIH units of the Suffolk Building (25% of the proposed 373 units) will have proposed Area Median Income (AMI) levels between 50% and 80% AMI. The final housing unit calculations for each income band have yet to be decided.

The Norfolk Building will be a 16-story, approximately 165-foot tall high-rise Affordable Independent Residence for Seniors (AIRS) building totaling about 86,711 square feet, including about 82,923 square feet of residential space and 3,788 square feet to be owned as an independent condominium unit by BHH. The Norfolk Building will include 115 senior housing units. The 115 AIRS units in the Norfolk Building are broken down to the following affordability levels:

Table 1: AMI Breakdown of 115 AIRS Units of the Norfolk Building

| AMI Level | Percentage (of 115 AIRS Units) | Total Units at AMI Level |
|-----------|--------------------------------|-----------------------------------|
| 30% AMI | 7% | 8 units |
| 40% AMI | 24% | 28 units |
| 50% AMI | 24% | 28 units |
| 60% AMI | 24% | 28 units (including super's unit) |
| 70% AMI | 20% | 23 units |

There would be approximately 208 units that will be affordable (consisting of 93 MIH units in the Suffolk Building and the 115 AIRS units in the Norfolk Building). The 208 units make up approximately 40% of the total developed 488 units for the Project Area.

Parcel 2A-1 Community Facility and Commercial Uses: CPC Headquarters and BHH Synagogue

The Proposed Development at Parcel 2A-1 would provide CPC with about 40,222 square feet of space to consolidate its programming from more than a half-dozen disparate locations throughout Lower Manhattan. CPC would be provided with a separate entrance to its facilities on Suffolk Street. Additionally, approximately 3,788 square feet of ground-floor space will be owned by BHH in the same location as its former home on Block 346, Lot 37. The BHH Synagogue will also have a separate entrance to its facilities on Norfolk Street.

The BHH space is intended to be used as a community facility for use as a worship space and a Jewish cultural heritage space but BHH may elect to convert this space on an as-of-right basis to a commercial use (e.g., office use) in the future. Because of the small size of this space, the impact of community facility and commercial use in this space are likely to be similar, and for purposes of the conservative environmental review, the BHH space was assessed as a community facility.

The total uses, square footage, and programming for the Proposed Development are listed below.

Table 2: Proposed Development Locations, Residential Units, and Uses

| Manhattan Location | Property Owner | Existing Use | Proposed Development | Residential Units (Existing and Proposed) | Lot Area, Existing and Proposed Uses |
|--|----------------------|---|---|--|---|
| Block 346 Lot 37 (Proposed Development Site 1) | Beth Medrash Hagodol | None | <ul style="list-style-type: none"> • 30-story (310 ft) mixed-use building (the Suffolk Building). • 16-story (165 ft) AIRS building (the Norfolk Building). • A landscaped interior courtyard. | <u>Suffolk Building</u> (Total Proposed 373 Residential Units): <ul style="list-style-type: none"> • 280 Market-rate • 93 MIH units <u>Norfolk Building</u> (Total Proposed 115 Residential Units): <ul style="list-style-type: none"> • 115 AIRS | <u>Suffolk Building Proposed Uses:</u> <ul style="list-style-type: none"> • 316,421 square feet Residential • 18,788 square feet Commercial • 40,222 square feet Community Facility <u>Norfolk Building Proposed Uses:</u> <ul style="list-style-type: none"> • 82,923 square feet Residential • 3,788 square feet Community Facility |
| Block 346 Lot 75 (Proposed Development Site 1) | GO Broome LLC | Accessory parking lot to the Hong Ning senior housing building (Block 346, Lot 1). | | | |
| Block 351 Lot 1 | NYCHA | <ul style="list-style-type: none"> • 23-story residential building; • Low rise community facility; • Open space. | • Remain as is. | • 181 residential units (existing) | 47,056 square feet (existing residential, community facility, and open space uses). |
| Block 346 Lot 1 | CPC-HDFC | <ul style="list-style-type: none"> • 14-story senior housing building (Hong Ning). | • Remain as is. | • 156 units (existing) | 19,483 square feet (existing residential use). |
| Block 346 Lot 95 (Proposed Development Site 2) | 384 Grand HDFC | <ul style="list-style-type: none"> • 5-story mixed use building with residential and ground floor retail. | • Remains as is. | • 26 units (existing) | 8,637 square feet (existing residential and commercial retail uses). In the future, the owner will develop approximately 4,759 square feet of additional commercial space. |

Special Permits and Waivers (Applications M790721(B)ZSM)

In addition to the requests for a (1) zoning map amendment change, (2) a zoning text amendment to designate an MIH area, and (3) a special permit to eliminate the accessory off-street parking on Block 346, the Applicants request special permits and waivers for the following:

- Waiver of the height and setback regulations to allow the Suffolk Building, located on the periphery of the LSRD, to exceed the maximum building height set forth in ZR Section 23-664(c)(1) (Modified height and setback regulations for certain Inclusionary Housing buildings or affordable independent residences for seniors);
- Distribution of 15,000 square feet of excess floor area from a zoning lot consisting of Block 346, Lot 95 to a zoning lot consisting of Block 346, Lots 1, 37 and 75 for the purpose of maximizing the amount of affordable housing in the Norfolk Building;
- Waiver of the height and setback regulations to allow a portion of the Suffolk Building along Suffolk Street, located on the periphery of the LSRD, to penetrate the required setback set forth in ZR Section 23-661(c), and (ii) the setback requirements of ZR Section 23-662(a) and (c) (Maximum height of buildings and setback regulations); and
- Modification of ZR Section 23-711 (Standard minimum distance between buildings) with respect to the minimum distances required between (i) the Suffolk Building and the Hong Ning building, (ii) the Norfolk Building and the Hong Ning building, and (iii) the Norfolk Building and the Suffolk Building.

The required distance between buildings varies between 20 and 60 feet below a building height of 125 feet. Above 125 feet, if buildings on the same zoning lot have a lot coverage that exceeds 40%, the required minimum distance increases to 80 feet.

The Hong Ning building is 126.13 feet, and the lot coverage at a height of 125 to 126.13 feet exceeds the 40% stipulated. Thus, the additional 1.13 feet above the maximum 125 feet requires distance between the Hong Ning, Suffolk, and Norfolk Buildings to be 80 feet. The Applicants are seeking to waive this distance of 1.13 feet (the waiver distance varies between each building). Above 126.13 feet, the lot coverage falls below 40% so the required distance between buildings returns to between 40 and 60 feet.

V. ENVIRONMENTAL IMPACTS

The Environmental Assessment Statement (EAS) that was prepared for the Proposed Development (CEQR Number 19DCP199M) states that the project will not exceed CEQR thresholds for analysis of the following areas and that no significant negative impacts would stem from the proposed actions and resulting development: community facilities; natural resources; water and sewer infrastructure; energy, and solid waste and sanitation.

The Environmental Assessment and Review Division has determined, pursuant to 6 NYCRR Part 617.7, that the Proposed Development could have a significant environmental impact related to the following areas: land use, zoning, and public policy; socioeconomic conditions; open space; shadows; historical and cultural resources; urban design and visual resources; hazardous materials; transportation; air quality; greenhouse gas emissions; noise; public health; neighborhood character; construction; and any other issues identified by the Draft Environmental Impact Statement (DEIS).

On February 26, 2019, Manhattan Community Board 3 (CB3) submitted testimony to comment on the Draft Scope of Work for the Proposed Development. The concerns outlined in the testimony are:

1. The Draft Scope of Work does not include an impact analysis of Community Facilities and Services, specifically, impacts on publicly funded child care facilities and public schools. While this is likely absent due to the proposed set-aside of 115 affordable senior units, a more conservative analysis framework that treats all units as non-senior would ensure that impacts are understood even in a situation where the senior units are not ultimately delivered.
2. The Draft Scope of Work must also consider an appropriate study area for construction impacts given the scale of cumulative construction happening in the area during the proposed construction period. Publicly known projects in the nearby area with construction periods that will coincide with the GO Broome Street Development construction period include Essex Crossing, Grand Street Guild, 247 Cherry Street, 260 South Street, 259 Clinton Street, and potentially NextGeneration NYCHA infill at LaGuardia Houses. The construction impact analysis must look cumulatively at all these sites, particularly to analyze traffic impacts and identify mitigations in a holistic way, considering the combined impacts from truck routes and detours from traffic diversions across a study area that encompasses all of the aforementioned developments.

On March 8, 2019, the Office of the Manhattan Borough President submitted testimony to comment on Draft Scope of Work for the Proposed Development. The concerns outlined in the testimony are:

1. Supporting CB3 in asking for an impact analysis of Community Facilities and Services.
2. Considering cumulative construction impacts happening in the area during the proposed construction period.
3. Analyzing further bus traffic and demand. Seniors primarily use buses as opposed to subways due to accessibility concerns. This should be studied extensively to ensure the bus service, both existing and planned, will accommodate an increase in population in the area.

VI. COMMUNITY BOARD 3 RECOMMENDATION

On September 24, 2019, Manhattan Community Board 3 voted 30 Yes, 0 No, 9 Abstaining, to approve the Go Broome Street Project with the additional conditions listed below:

- Coordinate meetings between the New York City DOT, the NYPD 7th Precinct, the GO Broome development and property management teams, the development and property management teams at Essex Crossing and Grand Street Guild, adjoining private development, the Community Board, and other relevant stakeholders to address traffic management, staging, and parking concerns during both the construction and operation period of the project;
- Integrate modern sustainable measures that reduce the carbon footprint these buildings create, follow legally mandated sustainability standards, strive for net zero carbon emissions through intentionally designing for and utilizing any renewable energy and sustainable construction incentives and methods;
- Ensure to build at least overall 50% affordable units and designate additional units for families with moderate and middle incomes;
- Attract former site tenants from all SPEURA sites;

- Ensure any costs for amenities to affordable units be consistent with percentage of reduced rent for these affordable tenants;
- Commit to enhancing trees and open space within the project sites and on surrounding sidewalks; and
- Study scenarios to lower the overall building height and bulk. At minimum, locate all mechanical and other services elsewhere on the site.

VII. MANHATTAN BOROUGH PRESIDENT’S COMMENTS

The GO Broome Street Project presented today is a rare opportunity to redevelop a site for a non-profit, mission-driven use that furthermore recognizes and preserves the history and legacy of the former Beth Hamedrash Hagadol Synagogue (BHH Synagogue). The Chinese-American Planning Council (CPC), the nation’s largest Asian American social services organization, approached my office nearly a year ago seeking support for the preservation of the remnants of the landmarked BHH Synagogue and alternatives in developing a new CPC headquarters and multi-use space for their social service programs. The preservation aspect of the Proposed Development has shifted considerably after the unforeseen tragic collapse in October 2019 of the remaining wall of the BHH Synagogue. This Proposed Development still offers a valuable opportunity to respond to the dearth of affordable senior housing units in Lower Manhattan through a unique, cultural collaboration between the Asian American and Jewish communities. That collaboration parallels the history of the area’s urban fabric and the several generations of immigrant communities of the Lower East Side that continue to live in the neighborhood.

I welcome the opportunity for more affordable housing units in lower Manhattan. Furthermore, I endorse the mission of the Proposed Development to support the social service needs of the Asian American community and other immigrant communities while accommodating the worshipers of the BHH congregation. However, I am also aware of the community concerns that surround this ULURP request for rezoning and multiple special permits.

Affordable Housing

In particular, I point to the request for the special permits that would allow the maximum building height to increase from 120 feet in the R8 district to 285 feet as permitted for a Quality Housing building in an R9-1 district. Subsequent changes in permitted FAR would also include a residential increase from 6.02 to 9.00 FAR, AIRS from 7.20 to 9.00 FAR, and community facility from 6.50 to 10.00 FAR.

The Suffolk Building is proposed as a 30-story, approximately 310-foot tall mixed-use, high-rise building while the Norfolk Building would be a 16-story, approximately 165-foot tall AIRS building. The Applicants claims that the requested variances are to maximize the Proposed Development’s FAR in order to facilitate “the density necessary to provide the amount of affordable housing, senior housing, and community facility uses to be included in the Proposed Development” (14). The Proposed Development’s 208 affordable units are significant and much needed in the neighborhood. However, the applicants should provide more affordable units across a wider range of income levels.

There is a senior housing crisis in New York City, with over 100,000 seniors on waiting lists for senior housing. The average wait for a unit is seven years.¹ According to a May 2018 report from the New York City Department for the Aging (DFTA), the population of New York City residents aged 60 and over will grow from 1.25 million in the year 2000 to 1.86 million by 2040.² Additionally, according to the November 14, 2019 Department of Homeless Services (DHS) daily report, 60,479 adults and children were in shelters throughout our city. This is

¹ <https://www.politico.com/states/new-york/city-hall/story/2016/02/the-senior-housing-crisis-031725>

² <https://www1.nyc.gov/assets/dfta/downloads/pdf/reports/Plan2025-092018.pdf>

unacceptable. As our senior population increases, we must allocate more resources - both land and subsidy – to the development of quality affordable housing that accommodates the needs of an aging population.

The Norfolk Building will create 115 AIRS units. However, only 8 of these units (7% of the total AIRS units) are affordable at 30% AMI (\$22,000 annual income). At least 30% of the total 115 AIRS units of the Norfolk Building must be made affordable to formerly homeless New Yorkers making 30% AMI or less. These numbers correspond to a similar senior housing project, Haven Green, which obtained approval in 2019 (Application No. C 190184 HAM).

The 93 MIH units of the Suffolk Building (25% of the proposed 373 units) are to be marketed at between 50% and 80% AMI. The number of units at each income level has not been specified. The Applicants should provide these numbers in their ULURP application so that this office as well as the community could provide meaningful feedback on whether these units could truly address affordable housing needs in the area. Additionally, other developments that have sought public approval, such as the neighboring Essex Crossing project, have 50% of their units designated affordable. I urge that the amount of MIH units be increased to 50% of the proposed units in the Suffolk Building and that unit distributions at each income level be released immediately to the public and to the City Planning Commission prior to their vote. I also urge the Applicants to shift the majority of units in this building to be affordable to households at the lower 30% to 50% AMI levels, with some MIH units set aside for formerly homeless families earning 30% AMI or less.

The Applicants must guarantee that the requested variances to maximize height and scale will be maximizing FAR for the purpose of affordable housing, senior housing, and community facility use. The approximate unit mix of the Norfolk and Suffolk Buildings is as follows:

Table 3: Unit Mix of Norfolk Building (115 AIRS Units)

| Unit Type | # of Units | % of Total |
|--------------|------------|-------------|
| Studio | 80 | 70% |
| 1 BR | 35 | 30% |
| Total | 115 | 100% |

Table 4: Unit Mix of Suffolk Building (To be determined: 93 MIH units)

| Unit Type | # of Units | % of Total |
|--------------|------------|-------------|
| Studio | 125 | 34% |
| 1 BR | 154 | 41% |
| 2 BR | 87 | 23% |
| 3 BR | 7 | 2% |
| Total | 373 | 100% |

The affordable studio units in the Norfolk Building and also in the Suffolk Building are unlikely to accommodate the senior population who live in intergenerational housing, and who do not or cannot live alone because of medical or financial issues. As such, I find that the number of studios does not match the extremely low income seniors (30% AMI) who may be living in inter-generational housing. I ask that the Applicants divulge more information on the number of units of each type in each AMI level and provide for more 2 or 3 bedroom units at lower AMI levels.

There is presently a lawsuit filed against one of the Applicants alleging non-compliance with local, state, and federal fair housing laws as they relate to housing opportunities for persons with disabilities³. It is imperative the marketing of these affordable units in both the Norfolk and Suffolk Buildings must adhere to affirmative fair housing and equal housing opportunity standards. Additionally, these units must be compliant with the Americans with Disabilities Act (ADA), especially AIRS units within the Norfolk Building and all communal spaces, including the landscaped courtyard.

Project Design and Public Access

While the requested waivers for height, setback, street wall and minimum spacing requirements are to maximize FAR for community or affordable housing uses, the bulk and height of the building with its minimal setbacks, is quite large when considering the narrow widths of Suffolk, Broome, and Norfolk Streets and the buildings that are adjacent to the Proposed Development that are currently under construction. With the narrow width of sidewalks and the height and bulk of the new buildings in the area, it is important to design for pedestrian safety and comfort.

While it is true that the area is well served by public transportation, there would be an expected increase in pedestrian foot traffic due to the development of the AIRS building as well as the surrounding Essex Street Crossing developments and the proximity to Essex Street Market. I urge the Applicants to include in their Project design any landscaping features for curb-side safety measures to protect pedestrians, such as the new employees of the CPC headquarters and the buildings' residents.

While the interior landscaped space will benefit the buildings' residents, it will largely be unavailable for the public to access. I recommend that the Applicants review the possibility of re-designing the strip of garden space that is mid-block on Grand Street between the existing 5-story commercial building and the Hong Ning building as a privately-owned public green space. A fence could be placed in the interior section between the Hong Ning building and at the end of the 384 Grand HDFO-owned, commercial building to block public access into the Project's courtyard. The area is an appropriate size for the creation of publicly accessible green space that would benefit the residents of Lower East Side.

Local Uses

CPC plans to offer a number of their Manhattan Programs to be relocated and based at their new headquarters of approximately 40,000 square feet. These include: adult literacy program, college counseling center, child care resource and referral program, career center, community center, employment network, youth opportunity hub, training programs, policy and advocacy, summer youth employment programs, volunteer and internship programs, and legal, family, multi-social, special needs, and community health services. I support the mission of CPC to provide for New York City's Chinese American, immigrant, and low income communities.

The BHH Congregation in turn will occupy approximately 4,000 square feet at the ground floor, which will include space for community, public, and outdoor use as a congregation and cultural heritage center with separate entrances. However, it is noted in the application that, "BHH may elect to convert the space to a commercial use

³ <https://www.documentcloud.org/documents/6550854-Forge-Lawsuit.html>

in the future” (24). The strength of this Project and application is truly the collaboration of CPC and BHH Synagogue in furthering community uses and social services. While many religious organizations across the New York City metropolitan area, in particular non-landmarked sites, face financial concerns and dwindling congregations that prompt their closure or redevelopment, I urge CPC to continue to support a community partnership with BHH Synagogue to remain within the 50 Norfolk space as intended. I request that a deed restriction be explored to be placed upon the ground-floor space that only allows religious or community facility uses. Future usage decisions to convert to a commercial space must be confirmed and approved by Community Board 3 and the District Council Member before any tenant(s) other than the approved BHH Congregation are to occupy the ground level.

Lastly, the future retail addition on Block 346, Lot 95 aims to increase its commercial space on the property by approximately 4,759 square feet of zoning floor area. However, a total of approximately 18,750 square feet of small format retail space will extend along the Broome Street corridor. It is imperative the Applicants maintain their promise of leasing to small format retailers as opposed to big box users. I caution the Applicants in avoiding the ongoing practice of large retail establishments being characterized as “variety stores” under Use Group 6 (“UG6”) in commercial districts.

Under UG6, variety stores are limited to 10,000 square feet of zoning floor area per establishment. However, because cellar spaces do not count toward the zoning floor area, big box corporations have been able to build up to 10,000 zoning square feet of retail above-grade, and fill out below-grade cellars with the majority of the retail store. In doing so, they exceed the 10,000 square foot limit and claim that their commercial space still constitutes as “small format”. Such was the scenario with Target Corporation which opened a 22,600 square foot store at 201 East 69th Street and a 23,000 square foot store at 40-31 82nd Street in Elmhurst, two districts that are zoned for UG6 local retail. I ask the Applicants to not conform to this zoning loophole, and instead consider the true needs of the residents and provide commercial spaces for affordable local retail.

Construction Timeline and Environmental Impacts

The GO Broome Project would add to one of the many construction sites that already occupy the landscape of the Lower East Side, one of the largest of which is situated adjacent from Proposed Development site. The nine-building Essex Street Crossing Development that has been under construction since 2015 and is expected to be completed in 2024, has already brought years of noise and dust emissions to the community.

GO Broome’s application says little about its construction timeline and milestones, aside from the DEIS that states a “2023 build year... [upon] receipt of project approvals in 2019 and a 2.5 year construction period.” Considering the years of substantive amount of construction in the area, I ask that the Applicants release as soon as possible, a timeline for construction that is presented to Community Board 3 and which must coincide with or end sooner than the end of construction slated for the Essex Street Crossing Development. In addition, at the release of the Final Environmental Impact Statement (FEIS) the Applicants must include a report of mitigation efforts to curb the construction emissions of noise, dust, and hazardous materials from this Proposed Development.

VII. MANHATTAN BOROUGH PRESIDENT’S RECOMMENDATION

Therefore the Manhattan Borough President recommends approval of ULURP Applications N200064ZMM, N200065ZRM, N200067ZAM, M790721(B)ZSM with the following modifications:

- Set aside at least 30% of the units in the AIRS building (Norfolk Building), for formerly homeless seniors earning 30% AMI or less.
- Increase the number of MIH units to 50% of all units in the Suffolk Building;

- Deepen affordability of the AIRS and MIH units by making a majority of units affordable to households in the 30%-50% AMI range;
- Release of the income band break downs of MIH units in the Suffolk Building prior to approval;
- Reevaluate the number of studio units and conduct a study on the percentages of seniors at the 30 to 50% AMI levels who live alone;
- Adhere to affirmative fair housing and equal housing opportunities when marketing the AIRS and MIH units and ensure that all required units are ADA compliant;
- Advance sidewalk design for pedestrian accessibility, safety and protection against traffic;
- Convert the strip of area between the Hong Ning building and the 5-story commercial building into a publicly accessible green space;
- Ensure any future decisions to convert the usage of the BHH Synagogue ground-floor space to a commercial space are confirmed and approved by Community Board 3;
- Ensure that the ground-floor commercial properties of the Proposed Development remain for the sole use by small format retailers;
- Release a construction timeline that shows completion of the Proposed Development that coincides with or ends sooner than the end of construction slated for the nearby Essex Street Crossing developments; and
- Include in the release of the FEIS, a report of mitigation efforts to curb the construction emissions of noise, dust, and hazardous materials from the Proposed Development.



Gale A. Brewer
Manhattan Borough President

cc: Wayne Ho, Chinese American Planning Council
Alice Wong, Chinese American Planning Council
Simeon Maleh, Gotham Organization

Bryan Kelly, Gotham Organization
David Pickett, Gotham Organization
Council Member Margaret Chin, Council District 1

Susan Stetzer, Community Board 3
Jim Shelton, Community Board 3

Application #: **C 200061 ZSM**

CEQR Number: 19DCP119M

Project Name: **Go Broome Street Development**

Borough(s): **Manhattan**

Community District Number(s): **03**

Please use the above application number on all correspondence concerning this application

SUBMISSION INSTRUCTIONS

- Complete this form and return to the Department of City Planning by one of the following options:
 - EMAIL (recommended):** Send email to CalendarOffice@planning.nyc.gov and include the following subject line: (CB or BP) Recommendation + (6-digit application number), e.g., "CB Recommendation #C100000ZSQ"
 - MAIL:** Calendar Information Office, City Planning Commission, 120 Broadway, 31st Floor, New York, NY 10271
 - FAX:** to (212) 720-3488 and note "Attention of the Calendar Office"
- Send one copy of the completed form with any attachments to the applicant's representative at the address listed below, one copy to the Borough President, and one copy to the Borough Board, when applicable.

Docket Description:

IN THE MATTER OF an application submitted by GO Broome LLC and The Chinatown Planning Council Housing Development Fund Company, Inc. pursuant to Sections 197-c and 201 of the New York City Charter for the grant of a special permit pursuant to Section 78-312 of the Zoning Resolution to modify the height and setback requirements of Section 23-66 (Height and Setback Requirements for Quality Housing Buildings) and the distance between buildings requirements of Section 23-711 (Standard Minimum Distance Between Buildings), in connection with a proposed mixed use development on property located on the southerly side of Broome Street between Norfolk Street and Suffolk Street (Block 346, Lots 1, 37 & 75), within an existing large-scale residential development bounded by Broome Street, Suffolk Street, Grand Street and Essex Street (Block 346, Lots 1, 37, 75 & 95; and Block 351, Lot 1), in R8 and R9-1/C2-5* Districts, Borough of Manhattan, Community District 3.

*Note: The site is proposed to be rezoned by changing an existing R8 District to an R9-1/C2-5 District under a concurrent related application for a change in the Zoning Map (C 200064 ZMM).

Plans for this proposal are on file with the City Planning Commission and may be seen at 120 Broadway, 31st Floor, New York, N.Y. 10271-0001.

| | | |
|---|--|--|
| Applicant(s): GO Broome LLC 432 Park Avenue South, 2 nd Floor, New York, NY 10016 The Chinatown Planning Council Housing Development Fund Company, Inc. 150 Elizabeth Street, New York, NY 10012 | | Applicant's Representative: Elise Wagner, Esq. Kramer Levin Naftalis & Frankel LLP 1177 Avenue of the Americas New York, NY 10036 |
| Recommendation submitted by: Manhattan Community Board 3 | | |
| Date of public hearing: 09/17/2019 | | Location: 59 East 4th Street |
| Was a quorum present? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> | | <i>A public hearing requires a quorum of 20% of the appointed members of the board, but in no event fewer than seven such members.</i> |
| Date of Vote: 09/24/2019 | | Location: PS 20 - 166 Essex Street, New York, NY |
| RECOMMENDATION <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> Approve <input type="checkbox"/> Disapprove </div> <div> <input checked="" type="checkbox"/> Approve With Modifications/Conditions <input type="checkbox"/> Disapprove With Modifications/Conditions </div> </div> | | |
| Please attach any further explanation of the recommendation on additional sheets, as necessary. | | |
| Voting # In Favor: 30 # Against: 0 # Abstaining: 9 Total members appointed to the board: 48 | | |
| Name of CB/BB officer completing this form Jim Shelton | Title Assistant District Manager | Date 10/23/2019 |



THE CITY OF NEW YORK MANHATTAN COMMUNITY BOARD 3

59 East 4th Street - New York, NY 10003

Phone (212) 533-5300

www.cb3manhattan.org - mn03@cb.nyc.gov

Alysha Lewis-Coleman, Board Chair

Susan Stetzer, District Manager

At its September 2019 monthly meeting, Community Board 3 passed the following resolution:

TITLE: ULURP No. 200064 ZMM - GO Broome Street Development

WHEREAS, GO Broome LLC and the Chinatown Planning Council Housing Development Fund Company, Inc. are seeking approvals for a project in the area bounded by Broome Street to the north and Grand Street to the south, between Essex Street and Suffolk Street, including the site of the landmarked but fire-damaged Beth Hamedrash Hagodol synagogue (BHH); and

WHEREAS, the Chinese-American Planning Council (CPC) would be the owner of the site and will lease the land to Gotham Organization, who is also purchasing land and development rights from BHH to complete the development site assemblage; and

WHEREAS, as ground lessees, Gotham Organization would develop the site as well as operate two new buildings in partnership with CPC and BHH; and

WHEREAS, the two new buildings—the Norfolk Building and the Suffolk Building—would include general mixed-income housing, 100% affordable senior housing, program and office space for CPC, space for the BHH congregation to establish a cultural heritage center, and ground floor retail space; and

WHEREAS, in total, the project would include 488 mixed-income rental units, with 208 permanently affordable units (43% of the total units); and

WHEREAS, with respect to the Norfolk Building:

- It would be a 16-story, approximately 165-foot tall residential building
- Its residential component would consist exclusively of 115 Affordable Independent Residences for Seniors ("AIRS" rental units)
- It would include 80 studio units and 35 1-bedroom units
- The AIRS units would be targeted at household income bands ranging between 30-80% AMI (\$22,410 to \$68,320 annual household income maximum); and
- It would include approximately 3,800 square feet of community facility gross square feet to be owned by BHH Synagogue as a worship and cultural heritage space; and

WHEREAS, this includes 27 additional affordable senior housing units from the version of the project the development team first presented to the Community Board 3 Land Use Committee in January 2018; and

WHEREAS, with respect to the Suffolk Building:

- It would be a 30-story, approximately 310-foot tall, mixed-use building;
- It would consist of 280 market-rate rental units and 93 affordable Mandatory Inclusionary Housing (MIH) rental units;
- 37 MIH units would be targeted at households earning 40% of AMI (\$29,880-\$46,120 annual household income maximum);
- 37 units would be targeted at households earning 50% AMI (\$37,350 to \$57,650 annual household income maximum);
- 19 units would be targeted at households earning 100% AMI (\$74,700 to \$115,300 annual household income maximum);
- The unit mix would have roughly 25% of the total building units set-aside for 2-bedroom and 3-bedroom apartment layouts;
- It would include approximately 40,000 gross square feet of community facility space to house the new CPC consolidated headquarters;
- It would include approximately 18,750 gross square feet of ground floor retail space on Broome Street; and

WHEREAS, to facilitate this development several land use actions are necessary, including:

- A zoning map amendment to change an R8 district to an R9-1 district with a C2-5 overlay;
- A zoning text amendment to designate a Mandatory Inclusionary Housing area; and allow the use of the Quality Housing Program;
- A City Planning Commission authorization to eliminate 33 required accessory off-street parking spaces;
- A modification of the Seward Park Extension West Large-Scale Residential Development (LSRD) to update site plan and changes to the zoning lots, an authorization to modify the regulations governing height and setback regarding the existing Hong Ning building, and Special Permits to modify height, setback and streetwall requirements in the LSRD; and

WHEREAS, the CPC community facility space would allow the organization to consolidate various offices, services, and programming under one roof; and

WHEREAS, the new BHH space would incorporate some salvaged elements of the historic landmarked synagogue and will be reserved for BHH use as a cultural heritage center; and

WHEREAS, the proposed development would include a shared, landscaped interior courtyard to be used by the CPC and the BHH Heritage and Cultural Center, and would be accessible to residents of both buildings; and

WHEREAS, the proposed project would include some unmitigated environmental impacts, including traffic impacts at the Delancey Street and Essex Street intersection during the weekday PM peak hour, and Grand Street and Clinton Street intersection during all peak hours; and

WHEREAS, construction activities would generate additional traffic impacts, including unmitigated impacts at the Grand and Clinton Streets intersection during the PM construction peak hours, particularly due to the cumulative trips generated by concurrent construction projects at Essex

Crossing (180 Broome Street and 202 Broome Street) and Grand Street Guild; and

WHEREAS, Gotham organization has committed to equitably contribute to an independent traffic planning consultant to study the cumulative traffic impacts generated by recently completed and projected development in the immediate area, and propose an alternative traffic master plan to mitigate these growing safety and congestion problems; and

WHEREAS, construction, traffic congestion created by it, and the resulting energy consumption by residents and businesses all contribute to the urban heat island effect and general use of non-renewable energy sources, all of which are known contributors to climate change;

THEREFORE BE IT RESOLVED, there must be regular coordinating meetings between the New York City Department of Transportation, the NYPD 7th Precinct, the GO Broome development and property management teams, the development and property management teams at Essex Crossing and Grand Street Guild, adjoining private development, the Community Board, and other relevant stakeholders to address traffic management, staging, and parking concerns during both the construction and operation period of the project; and

THEREFORE BE IT FURTHER RESOLVED, the design of the Community at Broome buildings should integrate modern sustainable measures that reduce the carbon foot print these buildings create; in addition to sustainability standards required by Law, the developers should strive for net zero carbon emissions through intentionally designing for and utilizing any renewable energy and sustainable construction incentives and methods; and

THEREFORE BE IT FURTHER RESOLVED, Community Board 3 recommends to approve the GO Broome Street Development (ULURP # C 200064 ZMM) with additional conditions as follow:

- Ensure to build at least overall 50% affordable units and designate additional units for families with moderate and middle incomes.
- Attract former site tenants from all SPURA sites
- Ensure any costs for amenities to affordable units be consistent with percentage of reduced rent for those affordable tenants
- Commit to enhance trees and open space within the project site and on surrounding sidewalks
- Study scenarios to lower the overall building height and bulk. At minimum locate all mechanical and other services elsewhere on the site.

Please contact the Community Board office with any questions.

Sincerely,



Alysha Lewis-Coleman, Chair
Manhattan Community Board 3



Jacky Wong, Chair
Land Use Zoning, Public & Private Housing



CHARLES B. WANG
COMMUNITY HEALTH CENTER
王嘉廉社區醫療中心

December 2, 2019

Re: Broome Street Development Project

Dear NYC Department of City Planning:

On behalf of the Charles B. Wang Community Health Center (CBWCHC), I am pleased to write this letter in support of the Chinese-American Planning Council, Inc. (CPC)'s mixed-use development project at 50 Norfolk Street. CBWCHC is an NCQA level 3 Patient-Centered Medical Home. We have sites in Lower Manhattan and Flushing, Queens, serving more than 60,000 patients with more than 300,000 service visits last year. Our mission is to provide high quality and affordable health care to the underserved, with a focus on Asian Americans.

CPC is a well-known provider of social services for high-needs populations in NYC and is a critical resource for linguistically accessible and culturally diverse programs throughout the five boroughs. We believe that providing affordable housing and space for local community based organizations is key to preserving the culture and landscape of our community. Over the years, CBWCHC staff have collaborated with and referred many clients to CPC. We look forward to the continued collaboration and growth of our positive working relationship with CPC. We are pleased to submit this letter in support of CPC's Broome Street Development Project.

Sincerely,

Jane T. Eng, Esq.
President and Chief Executive Officer



**Testimony
Regarding the
Broome Street Development**

Hello and thank you for the opportunity to speak in support of the Broome Street Development Project. My name is Wellington Z. Chen and I am the Executive Director of the Chinatown Partnership Local Development Corporation. I have known and partnered with Chinese American Planning Council (CPC) for years as a fellow social services nonprofit in the Lower East Side.

As fellow nonprofits, we fight side by side every day to provide social and economic empowerment to people throughout New York City.

I believe that by providing robust affordable housing and new homes to CPC and Beth Hamedrash Hagadol (BHH) Synagogue, the Broome Street Project will enable institutions with deep roots in our neighborhood to stay here and continue serving its people. As the Lower East Side changes rapidly, it is paramount that community-based organizations such as the Chinatown Partnership Local Development Corporation and CPC take an active role in the development of the neighborhood.

As many of our peers have and will attest, this project is a welcome addition to the neighborhood. It is for all of these reasons that we are happy to be supporting the Broome Street Development Project.

Thank you for your time and consideration.

217 Park Row, 2/FI. Suite 9 New York NY 10038-1101

Tel. 212-346-9288 Fax 212-346-0698

@ChinatownNYC

www.ExploreChinatown.com [www.Facebook.com/CPLDC](https://www.facebook.com/CPLDC)

**Chinese American
Citizens Alliance
Greater New York**

紐約同源會

39 Bowery
New York NY 10002

December 4, 2019

To Whom it May Concern:

The Chinese American Citizens Alliance of Greater New York supports initiatives and resources that benefit the lower Manhattan community and, in particular, its seniors. Working with local community organizations such as the Chinese-American Planning Council and the project at 50 Norfolk Street should be a priority for the City Planning Commission and these plans should move forward promptly.

As part of the oldest advocacy group for Chinese Americans in the country, CACAGNY, established in 1895, is very aware of the needs of the community and we are thus in support of the project at 50 Norfolk Street to provide better and more services and housing to our seniors and the rest of our community.

Sincerely,



Wai Wah Chin
President

**Testimony of
Chu, Yeung Yin**

**Regarding the
Broome Street Development Project**

Hello and thank you for the opportunity to speak in support of the Broome Street Development project. My name is Chu, Yeung Yin and I am the Tenant Association President of Chinatown HDFC located at 50 Norfolk Street, next to the proposed development project.

The Hong Ning Housing for the Elderly building is a 155 unit apartment building with 300 low-income senior residents. For 25 years, Hong Ning for the Elderly has provided homes and social activities for me and the other seniors in the building.

I am happy to support the new development project which will bring a new headquarters for Chinese-American Planning Council (CPC). Having a range of social services nearby that I, and the other seniors in the building can access will be beneficial to our community.

Thank you for your time.

YIN YEUNG CHU
DE YIN YEUNG CHU



FOR YOUTH DEVELOPMENT
FOR HEALTHY LIVING
FOR SOCIAL RESPONSIBILITY

Michael Keller
Executive Director

November 27, 2019

Marisa Lago, Chair
NYC City Planning Commission
120 Broadway, 31st Floor
New York, NY 10271

Re: Broome Street Development Project.

Dear Chair Lago,

I write in support of the Chinese American Planning Council's partnership in the Broome Street Development Project.

As you may know, the YMCA of Greater New York is committed to empowering youth, improving health, and strengthening community. The Chinatown YMCA provides programs aimed at addressing critical issues in our community, such as childhood obesity, diabetes, and social isolation. In order to accomplish this mission we collaborate with many other non-profit organizations in the social service sector, such as Chinese American Planning Council (CPC), to benefit and improve our community.

CPC has been dedicated to the social and economic empowerment of Chinatown and LES residents since its founding in 1965. The Community at Broome project is a natural extension of CPC's mission with its focus on expanded intergenerational programming and services for those most in need, especially our elderly – a rapidly growing population within Community Board 3. This project will allow CPC to provide a permanent home for many of their social service programs, such as college counseling, adult literacy, and community health services that would otherwise be at the mercy of the commercial rent market.

YMCA OF GREATER NEW YORK Chinatown YMCA 273 Bowery, New York, NY 10002
T 212-912-2465 F 212-777-0680 E mkeller@ymcanyc.org W ymcanyc.org/chinatown

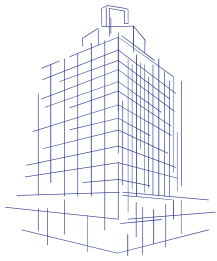
The Community at Broome will allow CPC to offer services in a centralized location that will be easily accessible, such stability is critical in providing quality social services. CPC is a trusted, reliable and transparent organization in a constantly changing and growing community. It is for all these reason why we continue to be partners, and why we support their Community at Broome project. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael", followed by a long horizontal line extending to the right.

Michael Keller
Executive Director

YMCA OF GREATER NEW YORK Chinatown YMCA 273 Bowery, New York, NY 10002
T 212-912-2465 F 212-777-0680 E mkeller@ymcanyc.org W ymcanyc.org/chinatown



CHUNG PAK 松柏大廈

CHUNG PAK LOCAL DEVELOPMENT CORP.

City Planning Commission Testimony Regarding the Broome Street Development

Thank you for the opportunity to provide our unequivocal support for the Chinese American Planning Council's (CPC) Broome Street Development Project. My name is Charles Lai and I am the Executive Director of the Chung Pak Local Development Corporation.

The Chung Pak development is a 13-story complex that houses 14 retail businesses; a daycare/universal Pre-K center, a community health clinic and 88-HUD section 202 low-income senior housing units serving the extended Chinatown community. For the past 37 years, Chung Pak has been an integral part of the economic, social and service life of the neighborhood.

Chung Pak and CPC have a long history of partnership and collaboration. CPC is a founding member of the development of the Chung Pak complex and has played a critical role in the viability and stability of our organization since the very beginning. We are also proud to house CPC's daycare/universal Pre-K center in our complex for these many years.

We are well aware of:

- the desperate need for low income housing, especially for our elderly population, as we have well over 4,500 people on our own waiting list (for one of our 88 units). A few of our recent tenants waited over 25 years to obtain an apartment in our complex.
- the critical need for stable operating homes for non-profits. The successes and good work of the CPC Chung Pak Daycare center and the Charles B. Wang Community Health Center over these many decades have greatly strengthened the health and welfare of the entire community.

Chung Pak is thrilled to be able to take this opportunity to lend support to CPC's Broome Street Development Project to create desperately needed affordable low and moderate income, and senior housing units for the City's most vulnerable populations. Additionally, the long-awaited for permanent CPC headquarters will be vital for the continuing and smooth operations of a leading multi-social service organization. In total, this project when completed will provide truly significant benefits to the Chinatown/Lower East Side community and the entire City of New York. We support this project wholeheartedly.

Thank you for your serious and positive consideration for this important project.

Charles Lai
Executive Director



William G. Leung, Chair
TD Bank (Retired)

Jeffrey D. Leong, Vice Chair
Life Financial Management

Tony Wong, Treasurer
Wong & Co., CPA

Alison Yu, Secretary
Hearst Foundations

Deborah Chan, Esq.
Law Office of Deborah Chan, P.C.

Suzanne Goon Mark
Time Inc. (Retired)

David K. Ho, LMSW
1199SEIU

Hans Johannsen
Agricultural Bank of China

Chong Min Lee
Woori America Bank

Elizabeth Lee
Cathay Bank

Anne Louie
TD Bank

Patrick Ng
Po Wing Hong Food Market

Sunny Wang
Broad USA

Danny K. Wong
Customers Bank

Kevin Yu

Hong Shing Lee, LMSW
Executive Director

Stephanie Lau, MPA
Assistant Executive Director

CMP promotes economic self-sufficiency and career advancement, with a strong track record in supporting the Asian immigrant population

Testimony of Hong Shing Lee

Re: Go Broome Street Development Project Public Hearing on Draft Environmental Impact Statement (DEIS)

NYC Department of City Planning
120 Broadway, New York, NY 10271

Ladies and gentlemen, my name is Hong Shing Lee, executive director of CMP – Chinatown Manpower Project, Inc.

CMP is a workforce and economic development organization dedicated to promote economic self-sufficiency and career advancement of New Yorkers, particularly members of the Asian American community. Established in 1972, CMP has been providing work readiness, college guidance, vocational training, job placement, entrepreneurial assistance, and other educational and social services to our community.

CMP has been working closely with Chinese-American Planning Council (CPC) as colleagues, allies, and partners in improving the lives and well beings of the same community and population that both organizations are dedicated to serve.

CMP is hereby testifying in support of the Go Broome Street Development project, a joint effort between CPC, Beth Hamedrash Hagodol (BHH) synagogue, and Gotham Organization. When completed, the project will create a mixed use development with a dedicated senior housing, community space, and affordable housing out of a currently underutilized, private parking lot, as well as a vacant, and since fire damaged, synagogue. The project will add 488 new residential units in the Lower East Side community, of which, close to 43%, or 208 units, are affordable housing. In addition, the nearly 19,000 square feet of small format retail space in the mixed use building will support small businesses growth in the community.

All told, this project will benefit diverse members of the community. It will provide senior citizens and low to moderate income resident affordable living accommodations, offer job opportunities to working age adults, small business opportunities to entrepreneurs, and facilitate economic stability and growth in the community. It is a welcome development out of previously unused or underused space and therefore does not displace any current establishments. CMP would like to express our wholehearted support of the Go Broome Street Development project.

Thank you.

From: [kate horsfield](#)
To: [19DCP119M_DL](#)
Subject: 19DCP119M - Comments on the DEIS
Date: Sunday, September 15, 2019 11:47:43 AM

Dear CPC:

As a resident of the East Village I have a very large stake in this project both by living close to the project on Avenue D and as a person who uses the park almost everyday the weather is permitting.

I am very concerned about the health aspects of this project, an issue that seems to be mostly obscured and buried in the language of the ESCR proposal. Yes, it says no major impact will result of the 'preferred plan' in the body of the text but the environmental compliances referred to are obscure to a layperson reading the plan. I am extremely doubtful that digging up a known area of environmental contaminants from the original landfill of the park plus bringing in 900 thousand tons of new landfill over 3.5+ years without a negative affect on the health of the community is really a credible statement. I believe this claim deserves a much closer look.

I feel that a professional environmental health consultant not employed by the city should review the plan to guarantee that those of us who are elderly and/or have lung disease as I do can live comfortably in the vicinity of the project without fear that our air is contaminated and causing unknown harm.

I sincerely hope you will take this comment seriously.

Kate Horsfield



December 2019

**Testimony
Regarding the
Broome Street Development**

Thank you for the opportunity to submit testimony in support of the Broome Street Development Project. My name is Alan van Capelle and I am the President and CEO of Educational Alliance. We have known and partnered with Chinese American Planning Council (CPC) for years as Settlement House partners in the Lower East Side. As fellow nonprofits, we fight side by side every day to provide social and economic empowerment to people throughout New York City.

Educational Alliance brings together and partners with diverse communities in Lower Manhattan, offering individuals and families high-quality, multi-generational programs and services that enhance their well-being and socioeconomic opportunities. As we have for 130 years, we offer best-in-class programming—now across 15 sites—focusing on a mix of education, health and wellness, arts and culture, and civic engagement. Educational Alliance's network of community centers includes the 14th Street Y, the Center for Recovery and Wellness, the Manny Cantor Center, the Sirovich Center, and Educational Alliance Community Schools.

We believe that by providing robust affordable housing for local residents as well as new homes for CPC and Beth Hamedrash Hagadol (BHH) Synagogue, the Broome Street Project will enable institutions with deep roots in our neighborhood to stay in the Lower East Side and continue serving their community members. As the Lower East Side continues to change rapidly, it is paramount that community based organizations such as Educational Alliance and CPC take an active role in the development of the neighborhood.

As many of our peers have and will attest, this project is a welcome addition to the neighborhood. It is for all of these reasons that we are happy to be supporting the Broome Street Development Project.

Thank you for your time and consideration.

Alan van Capelle
CEO and President, Educational Alliance

CONTACT US

212-780-2300 info@edalliance.org
197 East Broadway | New York, NY 10002
www.EdAlliance.org/

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Matthew Pietrus \(DCP\)](#); [Rupsha Ghosh \(DCP\)](#); [ManhattanComments_DL](#)
Subject: Comments re: C 200061 ZSM - GO Broome Street Development
Date: Tuesday, November 26, 2019 8:40:11 AM

Re. Project: C 200061 ZSM - GO Broome Street Development

- Application Number: **C 200061 ZSM**
- Project: **GO Broome Street Development**
- Public Hearing Date: **12/04/2019**
- Borough: **Manhattan**
- Community District: **3**

Submitted by:

Name: **ELLEN ACKERMAN**
Zip: **10002**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:
No

Additional Comments:

Please add my name to the opposition to the zoning changes from R8 to R9-1 and the associated special permits for the GO Broome Street Development. I am a resident who moved to this wonderful part of the city 15 years ago. This unique, diverse community is a very special place for many reasons. Allowing these zoning changes will set a precedent that will forever change that. Zoning regulations are in place as a means of protection. They should be upheld, not changed. The developers should respect the community they intend to build in instead of proposing a structure that doesn't meet existing regulations. Thank you in advance for your consideration. Ellen Ackerman

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Matthew Pietrus \(DCP\)](#); [Rupsha Ghosh \(DCP\)](#); [ManhattanComments_DL](#)
Subject: Comments re: C 200061 ZSM - GO Broome Street Development
Date: Wednesday, December 4, 2019 2:35:16 PM

Re. Project: C 200061 ZSM - GO Broome Street Development

- Application Number: **C 200061 ZSM**
- Project: **GO Broome Street Development**
- Public Hearing Date: **12/04/2019**
- Borough: **Manhattan**
- Community District: **3**

Submitted by:

Name: **nora breen**

Zip: **10002**

I represent:

- **Myself**

Details for "I Represent": **I am also a member of the Suffolk St. Block Ass. and the LES Against Rezone**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **Yes**

If yes, are you now submitting new information? **Yes**

I have attended or will attend the City Planning Commission's Public hearing on this project:
Yes

Additional Comments:

Hello and I'll thank you again for your time and work on the behalf of New Yorkers to oversee the responsible development of our city. After today's hearing, I see 3 major points of interest. 1. CPC is a beloved and successful NFP. I am for social programs and the CPC. 2. The opposition were residents opposing the ReZone, not the project and the "in favor of's" were not residents 3. To me the most Glaring and Important fact, Gotham Corporation is partnering with NFP organizations and making use of Tax Abatements laws to build profitable development. on (in this case) cheap or free land. The implications are frightening. Every non for profit needs help, with tax income from developers (as it is written) the Government could contribute more, instead, just as in the private sector where Billionaires make tax deductible charitable contributions while receiving tax breaks from the Government and call themselves

altruistic, denying the rest of us the tax income for infrastructure and public services such as schools. We leave it to a few to decide where this money goes. This benefits the few and not the many. This is a land grab. For it the CPC will get state of the art facilities and good for them. The rest of us will have to live with a building over 2X the size the foot print allows on streets eroding due to massive construction. To be honest, I cannot understand how this is even being considered. It's too much. The package is an embarrassment of riches to the developer with zero public benefit outside of the community the CPC serves, which again, I support. I think a profitability evaluation from Gotham would be interesting. Their renderings are misleading and the project is screaming through the process. Like Judy said, somewhere she hopes that someone will do the right thing and leave the zoning as it is. That is the right outcome. When your panel asked what we wanted. 20 stories is plenty high in my opinion. What is the far height? Set backs. More Trees. More affordable housing. I have submitted information as to the lawsuit Gotham is involved with (for unfair practices as well as health and human safety violations) as well as a question, what has Block 351 lot 1 have to do with this project. Please consider denying this rezone. And as a presenter asked, why is there no drawing for a building within the current zoning laws? With faith and appreciation, Nora Breen. nora@norabreen.com

Dear City Planning Commission,

My name is Junhao Chen and I am a member of CPC from the High School of Dual Language and Asian Studies. First, I would like to be thankful for everything from CPC because they always encourage me to do the best in school, even outside of the school. I am a student who almost failed two of my classes during my freshman year. Even though, I almost failed two of the classes, I didn't make any changes until I entered sophomore year. In my freshman year, I didn't have much interaction with CPC staff such as Ada, Sachaly, and Bryan.

After freshman year, I got into the COMPASS program, and at that time, I really started thinking about my future and my life. CPC staff is really trying hard to encourage and motivate me to do my best at school. Every afternoon or after school, they patiently sit down and have a talk with me. And every time they did that, I felt it was like a stress release. By then, I started to work hard in school by boosting my grades from under 80% average to 90% at the end of sophomore year and I was really proud of myself and be thankful for everything they have done for me.

Adding on to this, the CPC program provides a lot of opportunities for all students in our school such as a sports club, writing club, homework tutoring, and music clubs. I personally really enjoy joining clubs because it's entertaining and relaxes me. Furthermore, there are many trips from CPC which I like the most. Last year I joined almost all the trips from CPC and every trip I gained experience and knowledge such as first living in nature (Frost Valley Camp) and team working with my friend (Adventure Park) etc. CPC makes me make more friends and be better connected to the school.

Therefore, I would like CPC to further develop their program. By expanding CPC's workplace, students like us have more access to activities, events, parties, clubs and trips. In addition, CPC can hire more staff which benefits other high schools as well.

Sincerely,

Junhao Chen

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Matthew Pietrus \(DCP\)](#); [Rupsha Ghosh \(DCP\)](#); [ManhattanComments_DL](#)
Subject: Comments re: C 200061 ZSM - GO Broome Street Development
Date: Wednesday, December 4, 2019 10:44:06 AM

Re. Project: C 200061 ZSM - GO Broome Street Development

- Application Number: **C 200061 ZSM**
- Project: **GO Broome Street Development**
- Public Hearing Date: **12/04/2019**
- Borough: **Manhattan**
- Community District: **3**

Submitted by:

Name: **Glen Cummings**
Zip: **10002**

I represent:

- **Myself**

Details for "I Represent": **Myself and my family, residents of LES for over ten years.**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:
No

Additional Comments:

Re: (ULURP No.200064ZMM, CEQR No. 19DCP119M) The proposal is requesting an increase of 250% of the current allowable zoning, to create the tallest building in Essex Crossing (30+ stories); Under the current R-8 zoning, the allowable building size is 195,018 sq ft; With the zoning change to R-9 (unprecedented in Lower Manhattan), the allowable size would be about 290,000 sq ft. GO Broom is asking for more than 172,000 square feet in waivers --almost as much as the current zoning allowance, making the building about 460,000 square feet, with a height of over 310 feet.

From: [Rich Gasparre](#)
To: mn03@cb.nyc.gov (CB)
Cc: [19DCP119M_DL](#); bp@manhattanbp.org; polan@council.nyc.gov
Subject: Stop the 60 Broome Street Development!
Date: Monday, September 23, 2019 8:57:51 PM

I am a resident of the Seward Park Cooperative on the Lower East Side. I oppose the Gotham Organization's request for zoning variances for the 60 Norfolk Street Development.

The excess height requested by CPC and Gotham would have several bad consequences for the neighborhood:

1. It would aggravate neighborhood congestion, which is already significant even before the completion of the bulk of Essex Crossing. The proposed development will put at least an additional 1500 people (roughly 500 units x 3 people/unit average) on that block, compared to a current density of probably less than 100.
2. If even 10% of these people have cars, there will be 100 extra cars to park on the already narrow and overcrowded streets. Despite removing parking space for the trucks currently parking on the lot, neither CBC nor Gotham even attempted to address the traffic and parking issue in their presentation for the proposed development.
3. At a stated height of 310 feet – which will really be more like 330 feet after the elevator silo is installed above the top floor – the proposed development would block off light at street level and sight lines in several directions.
4. The Seward Park neighborhood has already absorbed a reasonable amount of large-scale developments, which are replacing the unique and historic feel of our streetscape with a sterile corporate façade.

CPC and Gotham claim that they need the zoning variance for reasons of “economic viability”, but the reality is more mercenary:

1. The CPC wants more space – but doesn’t want to pay rent. To subsidize their empire-building (not unusual among non-profits), they want more volume to accommodate more rent-paying tenants over whom to amortize their implicit rental expenses.
2. To maximize rent, the CDC and Gotham have arranged to base their affordable rent calculations on regional community averages that are in no way representative of the LES.
3. To make the proposal more attractive to their real constituency – the ethnic Chinese community – the Gotham design builds out to the edge of the lot in order to accommodate interior courtyards and space that would inevitably be used only by the residents of the building. (The notion that enclosed space is somehow “public” is one of the classic canards of NYC development, as shown by NYU’s development to the north of Bleecker Street.)

In other words, the CPC wants the Seward Park neighborhood to sacrifice quality of life to subsidize their projects and core constituency.

Furthermore, given the tendency of new developments such as Essex Crossing to bring in upscale/boutiquey shops, Gotham has conspicuously not mentioned any plans or intentions to bring in affordable basic shops, such as laundries, jewelers, or hardware stores.

Last - but not least, considering the insatiable appetite of developers - we must fear the signal that handing out variances sends to political special interests and the real estate lobby. After the monstrosity that is [the 80-story building next to Manhattan Bridge], any variance at this point makes a mockery of the zoning code, which will only be honored in the breach.

In short, I ask you to oppose any variance for the 60 Broome Street project.

Sincerely,

Rich Gasparre

413 Grand Street

(Seward Park resident for 20 years, and native Manhattanite)

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Matthew Pietrus \(DCP\)](#); [Rupsha Ghosh \(DCP\)](#); [ManhattanComments_DL](#)
Subject: Comments re: C 200061 ZSM - GO Broome Street Development
Date: Monday, November 25, 2019 2:23:01 PM

Re. Project: C 200061 ZSM - GO Broome Street Development

- Application Number: **C 200061 ZSM**
- Project: **GO Broome Street Development**
- Public Hearing Date: **12/04/2019**
- Borough: **Manhattan**
- Community District: **3**

Submitted by:

Name: **Jerry Kolber**
Zip: **10002**

I represent:

- **A local community group or organization**

Details for "I Represent": **LES Against Rezone**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:
Yes

Additional Comments:

Our community supports the idea of the Chinese Planning Council having this headquarters and affordable housing. We OPPOSE the developer Gotham using the CPC as a trojan horse to convince the city to allow an incredibly bulky and dense building, using affordable housing as a cover for what is really developer greed. Why are they not following the Essex Crossing model of following zoning and bulk that has been well established as best for the neighborhood? why does THIS building need to be allowed to build over 100 higher, and closer to the curb, and with less setback than any other? it does NOT. Reject the rezone, and let them build in accordance with surrounding existing buildings. two other pertinent issues; - Gotham is subject of a major lawsuit over it's failure in multiple projects to follow NY human rights law for the disabled. This lawsuit should be resolved before NY state gifts community resources to them. - Why has almost one million dollars been transferred from Gotham to

"GoBroomeLLC" for lobbying efforts? Nearly \$700,000 of this remains "unspent" according to state records so we are naturally curious as to the nature of this million dollar lobbying effort when existing zoning would be perfectly acceptable for retail, affordable housing, and CPC headquarters. This will of course be an issue if this becomes a press story, and everyone from Margaret Chin, Gale Brewer, CB3, and the City Planning Commission are listed in the NY State Ethics database as having been recipients of this generous lobbying effort. thanks!

From: [Samuel Moskowitz](#)
To: [19DCP119M_DL](#)
Subject: 19DCP119M - Comments on the DEIS
Date: Tuesday, December 3, 2019 9:32:23 AM

Dear City Planning Commission:

The proposed Go Broome Street Development variance is wholly inappropriate. Eliminating the setback and sky exposure plane requirements for this enormous project (the size is more than double than that allowed under zoning) will have a variety of negative impacts on the area.

What is the point of zoning if anyone can just more than double the size of the building to be constructed under the "law"?

According to the DEIS: *Overall, the proposed project would be in keeping with the new tall, multi-family elevator buildings being constructed as part of Essex Crossing.* However, GO Broome would include a 30-story building while Essex Crossing's tallest building is 24 stories- **inconsistent** with land uses, zoning, and public policy in the area.

Sincerely,
Sam Moskowitz

From: [Sidney Moskowitz](#)
To: [19DCP119M_DL](#)
Subject: 19DCP119M - Comments on the DEIS
Date: Tuesday, December 3, 2019 1:57:19 PM

Dear City Planning Commission:

The Go Broome Street Development project, as currently proposed is simply a bridge too far.

I am advised by experts in these matters that, as proposed ,it would eliminate existing setback and sky exposure plane requirement, and so this huge project which is more that 100% over the size allowed under current zoning restriction, would obviously have a variety of negative impacts on the area.

So, please apply a standard that more closely conforms to existing guidelines in order to preserve the integrity and quality of life of this community.

Sid Moskowitz
504 Grand St.
NY NY 10001

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Matthew Pietrus \(DCP\)](#); [Rupsha Ghosh \(DCP\)](#); [ManhattanComments_DL](#)
Subject: Comments re: C 200061 ZSM - GO Broome Street Development
Date: Monday, November 25, 2019 7:17:28 PM

Re. Project: C 200061 ZSM - GO Broome Street Development

- Application Number: **C 200061 ZSM**
- Project: **GO Broome Street Development**
- Public Hearing Date: **12/04/2019**
- Borough: **Manhattan**
- Community District: **3**

Submitted by:

Name: **JENNIFER PERCIBALLI**
Zip: **10002**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:
No

Additional Comments:

I am writing to encourage you to do the right thing by the residents of the Lower East Side, and oppose the zoning change requests from R8 to R9-1 for the GO Broome Street Development, and here's why: . This could set a precedent for allowing more rezoning throughout Manhattan; zoning rules are created to protect the community . This proposed building will be taller than any Essex Crossing building height Abuts two narrow streets, yet is designing the building with fewer setbacks . The developer is involved in a lawsuit, citing his non-compliance with ADA apartments for handicapped . Community Board 3 expressed concerns about traffic, safety and congestion problems during and after construction -- and this neighborhood has yet to see the impact of all the SPURA buildings once SPURA apartments are filled (which are not at capacity yet).

Dear City Council,

My name is Stacie Pranata a current junior attending High School for Dual Language and Asian Studies. Ever since coming to the school, I have been largely impacted by the clubs CPC funds and have been apart of many clubs. These clubs were able to add creativity to a very education based school and make the day less boring. As of right now My friend Elma and I are the leaders of this years WE Club mainly focusing on the environment as well as the increasing homeless rates. We are currently starting a project to raise up food cans to donate them to the local Bowery Mission. This is what CPC does, it helps others in need as well as raise up leaders that will be our future, so by having a larger office not only can it provide more educational services for the students of New York, but also it can house staff that are using their time to help others.

Thank you for using important time to read this,
Stacie

From: [Judy Prigal](#)
To: [19DCP119M_DL](#)
Subject: 19DCP119M - Comments on the DEIS
Date: Saturday, November 23, 2019 8:59:20 PM

To the City Planning Commission

This development is should not have its zoning changed from R8 to R9-1. It is higher than any of the recently completed Essex Crossing buildings and will further bring traffic congestion and truck traffic and pollution to a neighborhood trying to absorb so much new construction.

Please at least have developer not exceed current zoning.

Judith Prigal

212 East Broadway

Sent from my iPhone

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Matthew Pietrus \(DCP\)](#); [Rupsha Ghosh \(DCP\)](#); [ManhattanComments_DL](#)
Subject: Comments re: C 200061 ZSM - GO Broome Street Development
Date: Monday, November 25, 2019 1:01:49 PM

Re. Project: C 200061 ZSM - GO Broome Street Development

- Application Number: **C 200061 ZSM**
- Project: **GO Broome Street Development**
- Public Hearing Date: **12/04/2019**
- Borough: **Manhattan**
- Community District: **3**

Submitted by:

Name: **Judith Prigal**
Zip: **10002**

I represent:

- **A local community group or organization**

Details for "I Represent": **A group of neighbors opposed to this project**

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:
Yes

Additional Comments:

I oppose changing the zoning from R8 to R9-1. Our neighborhood is becoming overdeveloped and overcrowded and two nearby buildings are not even populated yet. This building will be in the midst of Essex Crossing and does not fit in with those buildings which were carefully planned to be in harmony with each other. The developer needed so many zoning changes and special permits to not only build higher, but also bulkier, with fewer setbacks and closer to other buildings on the same block. The Suffolk building abuts two narrow streets but the applicant wants special permits to build closer to the streets. Our neighborhood already has a good share of affordable senior housing, including a dedicated Essex Crossing building and another one being built on Essex Street. A change to R9-1 would be the only such zoning in downtown Manhattan. Please do not let a developer change the present zoning, which was put in place to protect our neighborhood from overdevelopment. Thank you, Judith Prigal

From: [michelle rosenberg](#)
To: [Manhattan B.P. Gale Brewer](#); bp@manhattanbp.org; [Brewer, Gale \(ManhattanBP\)](#)
Cc: [19DCP119M_DL](#)
Subject: ULURP for GO Broome Street Development (CEQR Reference Number: 19DCP119M)
Date: Friday, October 4, 2019 12:32:09 PM

Project: GO Broome Street Development
CEQR Reference Number: 19DCP119M
Borough: Manhattan, Community Board 3
Blocks: Block 346, Lots 1, 37. 75. 95; Block: 351, Lot 1
Position: Opposed

I am a mother of two young kids that live at the Seward Park Co-ops and I'm writing to register my opposition to the proposed zoning change at 60 Norfolk for the following reasons:

1.
The site became available after a tragic fire that destroyed a historic structure and created very dangerous conditions for the immediate neighbors, including the Hong Ning senior home next door and NYCHA building across the street. No news outlet reported on any serious injuries at Hong Ning senior housing possibly because the operator of the senior housing is a partner in the development. The Seward Park Coops, where my family lives, is further away but the smoke was still at dangerous levels.. Everyone believes that the fire was deliberate for the purpose of making this lot available for development. The congregation of the Beth Hamedrash Hagodol synagogue had long been attempting to get special permission to demolish the historic building and negotiations were already underway with the current developers prior to the arson. Although the intention of this criminal activity is unsubstantiated, we know this is an issue in NYC and beyond. Not addressing this leads to validating this illegal and dangerous practice and encourages other owners of unprofitable buildings to do the same. Landlords from across the city will take note of how the city dealt with this situation now and in the future and may use this as a roadmap on how to get away with arson.
2.
Allowing a zoning variance for a building in the middle of an active development area creates a new precedent and raises the average building height of the area. The exception quickly becomes the norm and the next building (perhaps one of the many currently under construction across the street) will now be able to use the example at 60 Norfolk to argue for their own zoning variance. The zoning rules exist for a reason... and there is no proof given by the developer that he can't create a project with the same or similar "community benefits" at the lower building height. If Essex Crossing can provide 50% affordable units at 20 stories, why can't 60 Norfolk? Allowing this deviation creates unintentional consequences that will not be thoughtfully mitigated by the developers, especially at the unusual speed of this particular URLUP process.

3.

This new development wants to add almost 500 new apartments (over 1000 more people), more than half of all the new units in all of Essex Crossing. We are a community that is already underserved by adequate infrastructure, schools and transportation. We have excessive traffic problems and pollution and some of the most dangerous intersections and subway stations in Manhattan are less than a block from 60 Norfolk. The developers do not address any of these issues and instead offer "community benefits" that appeal specifically to the local City Council Member's interests. It's well documented that Margaret Chin has a close relationship to Chinese American Planning Council (a partner in the development) and is a champion of senior housing in general. These "community benefits" appear designed to appeal to her, not to the actual neighbors of this development. Many of my neighbors who oppose this development are seniors, so it's ironic that the Community Board and our City Council representative refuses to listen to what the seniors in the area actually want. To us, the community that was left out of the conversation, this looks like old fashioned corruption.

4.

The historic synagogue's facade currently still stands but has been deemed structurally unstable. There are many ways to save a structurally unstable facade and an independent consultant was not retained to look into it. Only "the footprint" of the building will be saved, a small cluster of bricks that have zero historical interest. I assume this is the easiest and cheapest way to follow through on their requirement to preserve some of the historic building. But it reads as yet another way for the developers to maximize their profits and disavow their responsibility to the community.

Please reject this up-zoning and give the actual community a break. We are already inundated with new construction, about to have thousands of new neighbors at Essex Crossing with plenty of senior housing and affordable units. If the mayor wants to replace the senior housing from Rivington House, have him do it honestly and not on a lot made available by arson. The Community Board and the City Council have not taken any of our issues seriously, they are blinded by the "good" of adding a few more units of senior housing and not thoughtful or concerned about the cost of irresponsible over-development.

Thank You,
Michelle Rosenberg
415 Grand Street
New York, NY 10002

From: furpods@verizon.net on behalf of [Kami](#)
To: [19DCP119M_DL](#)
Subject: Please OPPOSE the GO Broome St proposal
Date: Saturday, September 21, 2019 9:01:12 PM

Hello,

I'm writing to urge you to PLEASE OPPOSE the Gotham Organization's Broome Street Development proposal for zoning variances which will result in buildings way out of size and proportion for our Lower East Side neighborhood.

Our neighborhood has already been transformed from a quiet area of the city, but we allowing buildings taller and larger than those of Essex Crossing is changing us into the likes of an inner city development, that is, crowded. Too crowded. Open spaces are important for our physical and mental health, and those are spaces are disappearing. There've been more than enough "development" in Manhattan, including the lower east side.

One concern regarding this project is more housing for senior citizens -- of which I'm one -- but the new Essex Crossing already has a building dedicated for seniors, with another one soon to open.

The Gotham organization can still have apartments dedicated to seniors even in a smaller development. Using this argument for the variance is, in my opinion, unethical.

It's apparent that the CB3 members who apparently were predetermined to vote for this variance change, didn't have the will of its constituents in mind. Please listen to the will of most of our residents and vote to OPPOSE the variance change.

Kami Scott
387 Grand St.
New York, NY 10002

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Matthew Pietrus \(DCP\)](#); [Rupsha Ghosh \(DCP\)](#); [ManhattanComments_DL](#)
Subject: Comments re: C 200061 ZSM - GO Broome Street Development
Date: Monday, November 25, 2019 11:46:03 PM

Re. Project: C 200061 ZSM - GO Broome Street Development

- Application Number: **C 200061 ZSM**
- Project: **GO Broome Street Development**
- Public Hearing Date: **12/04/2019**
- Borough: **Manhattan**
- Community District: **3**

Submitted by:

Name: **Kami Scott**

Zip: **10002**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

I STRONGLY OPPOSE the zoning changes from R8 TO R9-1 for the GO Broome Street Development, and the associated special permits. The new building will be taller than the tallest Essex Crossing buildings. This will change the HISTORIC nature and aesthetics of our neighborhood. This neighborhood is already growing with the Essex Crossing project. The proposed project would more than overwhelm this neighborhood. The streets surrounding the project are very narrow. This can be dangerous and unhealthy. More open space is needed among the new buildings, according to the current zoning regulations. The apartments of two of the Essex Crossing buildings, one open, one soon to open are totally for senior citizens. It will remove a few small but beautiful parks, a necessity these days for people to relax in. Most of the new(er) buildings in Manhattan -- which I can see from my apartment on Grand Street which faces north -- are for the wealthy. There are MORE THAN ENOUGH apartments in

this city for them. Please do NOT allow the zoning change, and let this historic neighborhood stay livable for all residents.

From: [Carrie Smith](#)
To: [19DCP119M_DL](#)
Subject: Comments on the DEIS for the GO Broome Street Development
Date: Monday, November 11, 2019 11:33:43 PM

I would like to submit my comments on the DEIS for the Go Broome Street Development. My name is Carrie Smith and I am a resident of the Lower East Side, living within four blocks of the proposed development.

I strongly oppose this development, a development which would add more multi-million dollar apartments to a neighborhood already overwhelmed with high-rise luxury developments like: The Rollins, Essex Crossing, 242 Broome, and the nearby mega-tower One Manhattan Square.

This neighborhood, the historic locus of a vibrant immigrant community, has been ravaged by developers treating the area as a playground for the rich. This community does not need more million-dollar units; what it needs is truly affordable housing for low and no-income residents.

Additionally, this neighborhood has been plagued with ridiculous amounts of construction, obstructing roadways and creating unsafe conditions for bicyclists and pedestrians, polluting the air with debris and toxic chemicals, and causing noise pollution.

Lastly, the neighborhood is becoming darker, under the shadow of the huge, 30-story towers. We live in the shadows while the super-rich enjoy the sun and views from their penthouses.

I demand that the DCP reject this application and give New Yorkers what they truly need: public housing for no- and low-income residents.

Thank you,
Carrie Smith
34 Ludlow St #12A
New York, NY 10002

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Matthew Pietrus \(DCP\)](#); [Rupsha Ghosh \(DCP\)](#); [ManhattanComments_DL](#)
Subject: Comments re: C 200061 ZSM - GO Broome Street Development
Date: Wednesday, December 4, 2019 11:01:47 AM

Re. Project: C 200061 ZSM - GO Broome Street Development

- Application Number: **C 200061 ZSM**
- Project: **GO Broome Street Development**
- Public Hearing Date: **12/04/2019**
- Borough: **Manhattan**
- Community District: **3**

Submitted by:

Name: **elisa testa**

Zip: **10019**

I represent:

- **Myself**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**

If yes, are you now submitting new information? **No**

I have attended or will attend the City Planning Commission's Public hearing on this project:

No

Additional Comments:

The sponsors of this project: 1. are attempting to benefit from a suspiciously convenient and unresolved arson which many suspect was commissioned by them 2. already had a death due to collapse of a structure deemed not structurally stable, within their site, months prior to the incident. 3. are planning to add massive amounts of square feet while removing required accessory off-street parking. 4. have misled the public about the number and quality of affordable housing and community spaces. **THEY SHOULD NOT BE REWARDED FOR THEY BORDERLINE CRIMINALITY**

From: [Public Hearing Comments \(Do not reply\)](#)
To: [Matthew Pietrus \(DCP\)](#); [Rupsha Ghosh \(DCP\)](#); [ManhattanComments_DL](#)
Subject: Comments re: C 200061 ZSM - GO Broome Street Development
Date: Monday, November 25, 2019 3:05:58 PM

Re. Project: C 200061 ZSM - GO Broome Street Development

- Application Number: **C 200061 ZSM**
- Project: **GO Broome Street Development**
- Public Hearing Date: **12/04/2019**
- Borough: **Manhattan**
- Community District: **3**

Submitted by:

Name: **Alison Spielman**
Zip: **10002**

I represent:

- **Myself**
- **A local community group or organization**

Details for "I Represent":

My Comments:

Vote: I am **opposed**

Have you previously submitted comments on this project? **No**
If yes, are you now submitting new information?

I have attended or will attend the City Planning Commission's Public hearing on this project:
No

Additional Comments:

Please carefully consider the following reasons why the verdict on this project must be a resounding "NO." Just about any of these aspects are reason enough in and of themselves, but when taken together, it's unfathomable that this construction would be permitted to move ahead according to the current plans. . These proposed construction will result in buildings that are far taller and bulkier than any Essex Crossing building in that sprawling construction zone, which myself and my community have already been living within. Does the greed of these Go Broome Street Development developers know no bounds?? . Overdevelopment in neighborhood. This project would mean four additional new buildings with others quite possibly on the way right behind them. A terrible idea for those of us who appreciate light and air for things like, you know, breathing...! . This project would require different zoning

permits, but the zoning of the area has been set as it is with good reason. Don't allow them to sneak around the rules and change zoning from R8 to R9-1! . Our neighborhood already has more than its fair share of affordable senior housing in TWO dedicated buildings . It's a known fact that this questionable developer is already involved in a lawsuit for not following ADA guidelines -- and there's already been one very preventable fatality on this supposedly well-regulated construction site. How many more such deaths need to happen before we wake up? . More negative impact on traffic, safety and congestion during construction and operations -- this on top of what members of the community have already been (and still are) having to live with given the Essex Crossing project (still ongoing) . 40,000 square feet for Chinese-American Planning Council (enough for 40 2BR apartments!) seems extremely excessive for a building with a relatively small footprint. The BHH Synagogue could change its community space as of right. ...and I could go on! Please don't sell out our Lower East Side community in favor of fast cash from fat-cat developers!

From: [Nadine Woloshin](#)
To: mn03@cb.nyc.gov (CB)
Cc: [19DCP119M_DL](#)
Subject: Vote No on rezoning for CPC's Go Broome project!
Date: Monday, September 23, 2019 6:22:28 PM

As a resident of Seward Park—already beleaguered by years of non-stop construction—I urge you to refuse the Chinese Planning Council's request for a R9 waiver. The waiver would allow CPC to build the GoBroome project 300-feet-high, 30% higher than nearly all its neighboring buildings. This will block views, light and sky for thousands of community residents.

CPC claims the city should make Suffolk Street a Mandatory Inclusionary Housing Zone because it is building "affordable housing." However, more than half of the low-income units for a family of four allow more than \$50,000 annual income; 20% of the "affordable" family units are available for people making more than \$115,000 per year; and seniors must make between \$22,410 and \$68,320 to qualify. Not only is the CPC low-income housing unaffordable for most people who are truly low income, it also only accounts for 43% of all the rental units that will be built.

As far as the MIH waiver, there's a good reason Zone R9 does not currently exist in lower Manhattan. It is the highest density zoning allowed in NYC, typically reserved for major avenues. In addition, CPC wants to create additional density by reducing the setback to the curb on Suffolk from 15 to 10 feet and reducing the space between buildings by more than 75% of what is required; it also wants to consolidate all outdoor space into interior "residents only" spaces—not very neighborly!

Essex Crossing, the new development which surrounds CPC, created shared communal outdoor space and made 50%--500 of its 1,000 rental units--available as affordable housing all without any special zoning.

I grew up in East River Housing and attended PS 110. My daughter is the fourth generation in our Seward Park apartment. As a child, I attended services with my grandfather at Beth Hamedrash Hagadol. When I see the changes that have taken place in the neighborhood I feel outraged. This is a neighborhood of great historic and cultural significance. I wish we had protected the LES by creating a historic district like the one in Park Slope. I know that ship has sailed, but I hope it's not too late to make sure that CPC's project respects the neighborhood and truly offers affordable housing.

Sincerely,

Nadine Woloshin
387 Grand Street
New York, NY 10002

Dear City Planning Commission,

My name is Adam Xu and I am one of the participants that work with CPC and through this letter, I would like to share my experience with CPC. First, my school is High School For Dual Language And Asian Studies and CPC runs all the after school programs and clubs in our school, such as COMPASS, basketball, badminton, etc. In the past, when I was a freshman, I didn't notice that CPC was even a thing in our school. However, in my sophomore year, I got a chance of joining the COMPASS program, which runs by CPC and after that, I got to know more stuff about CPC and the world around me.

As a student, I am so glad that I am a member of CPC because the staff of CPC that works with our school keeps encourage me to do better in school and that's why my grade increase to 95 in my sophomore year. Additionally, CPC staff (Bryan, Sachaly, Ada, Angel) did not only encouraged me to do better in school, at the same time they taught me how to view the world from a positive perspective. For example, I often struggle with making decisions and it's annoying, but they always supported me by giving me suggestions.

Moreover, CPC also took me to experience the things that I never experienced before, such as trips. Also through trips, it builds up my relationships with other students in my school, which helps me become more comfortable in school. As a result, I would like CPC to encourage more students like me by having more staff working with the students at other schools.

As I mentioned in the above, to have more staff, CPC needs more space to hire more workers that can go to a different school after school. In addition, with a bigger working space, CPC can offer more opportunities, such as after school programs, programs for adults

and the elderly. Overall, CPC can help more people that live around NYC that need help.

Thank you for collaborating with CPC and have a nice day.

Sincerely,

Adam Xu

Brenda Liang
916 63rd st
Brooklyn, NY 11219
Brendawong17@yahoo.com

NYC Department of City Planning,
City Planning Commission
120 Broadway, Concourse Level,
New York, NY 10271

Dear City Planning Commission,

My name is Brenda Liang, currently a 3rd year at Stony Brook University. I feel very strongly about the CPC One project. Their In School Youth program has helped me immeasurably. I had a safe space where I could learn life skills and hang out with peers that were the same age as me. It was a small room but it felt like a second home to me because of all the friendly mentors and peers. I learned about work experience, how to apply to college and financial aid. I loved their community involvement events because I never would have been able to go volunteer by myself. I felt like I made a huge impact alongside my peers from ISY.

With additional programming space in the Lower East Side, CPC could do so much more community projects that benefit everyone. They could collaborate with more people and make measurable changes in the area. They could have more office space to hire more staff and host even bigger events with more people getting to know each other. With more participants and volunteers, we can make so many changes and have our ideas heard and spread.

Thank you for listening to my experience with CPC and ISY. I really appreciate their help with youth and the whole community. Everything they do is so helpful and I talk about them

to my family. My grandma especially likes them because they help immigrants who don't speak English such as herself. They are such a valuable resource and if CPC expanded, they could reach even more youth and elders.

Sincerely,

A handwritten signature in black ink that reads "Brenda Liang". The script is fluid and cursive, with the first name "Brenda" being more prominent than the last name "Liang".

Brenda Liang

December 13, 2019

Dear City Planning Commission Members,

We are a group of licensed family child care providers based throughout New York City. We have been receiving child care and early childhood education training as well as technical assistance from the Chinese-American Planning Council's Early Childhood Learning and Wellness Services.

We are currently taking the 120-hour Child Development Associate course on Saturdays in the lobby because we often have no classroom space as there are many training and activities going on. CPC ECLW has been a great help to us and assist us to ensure the sustainability of our child care business. The training and services we received also have helped us improving our childcare businesses and the quality of care to the children under our care.

It has been challenging to find these affordable services since there are few other organizations that provide these services in multiple languages, some of which are only presently served by CPC-ECLW. We presently use CPC ECLW's office lobby and some small conference rooms for our training classes due to limited space at CPC's 165 Eldridge Street office. Thus, if CPC has a bigger office, then they would be able to help more people in our situation and that we don't need to use the lobby for classes. CPC would also be able to help more community members.

Thank you for reading our letter!

J L

Idala Kandil

D. Elliott

S. Alleyne

Aracelis Tineo

Felicia C.

Penela Soto

Hon. [Signature]

Samantha Vanderpool

Hala Kandil

Deserie Elliott

STACIE ALLEYNE

Aracelis Tineo

Belkiss Carrera

Penela Soto

Nora Elazabawy

December 13, 2019


Dear City Planning Commission Members,


We are a group of licensed family child care providers based in Chinatown, the Lower East Side, Brooklyn, and Queens. We have been receiving child care and early childhood education training as well as technical assistance from the Chinese-American Planning Council's Early Childhood Learning and Wellness Services.

We are currently taking the 120-hour Child Development Associate course on Saturdays in the lobby because we often have no classroom space as there are many training and activities going on. CPC ECLW has been a great help to us and assist us to ensure the sustainability of our child care business. The training and services we received also have helped us improving our childcare businesses and the quality of care to the children under our care.

It has been challenging to find these services since there are no other organizations that provide these services in Chinese. We need to use CPC ECLW office lobby for our training classes due to limited space at CPC's 165 Eldridge Street office. Thus, if CPC has a bigger office, then they would be able to help more people in our situation and that we don't need to use the lobby for classes. CPC would also be able to help more community members.

Thank you for reading our letter!

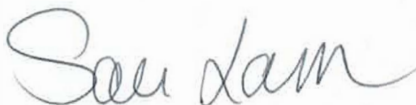
Chen Wei Qi 

Huan Di Li 

Yueyi Zhao



Sau Lam



Yue Ming Li



Yan Zhu Liao



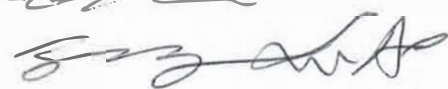
Hui Lan Ruan



Choi wa Pang



FENG Xiao



Yanni Chen



XiaoxiaXiang 

Lit Hui Min 

December 12, 2019

Dear City Planning Commission Members:

I am Hala Kandil and I am taking a CDA course offered by CPC's Early Childhood Learning and Wellness Services. The CDA credential is a mark of quality that improves the quality of a childcare provider's services and helps me improve the quality of education of children under my care. CPC's staff has been extremely helpful as they are multilingual and can better assist their students that are less than fluent in English by speaking and using course materials in multiple languages. I support CPC's expansion as it would give them more space to train more people like me that want to become better childcare providers but are not as proficient in English.

Thank you for your time,

A handwritten signature in black ink that reads "Hala Kandil". The script is cursive and fluid, with a small dot at the end of the line.

Hala Kandil

Jacky Chai- jchai2020@erhsnyc.net
124 Carlton Ave. Apt. 6A
Brooklyn, NY 11205

NYC Department of City Planning,
City Planning Commission
120 Broadway, Concourse Level,
New York, NY 10271

December 9, 2019

RE: In support of CPC One Project at Lower East Side

Dear City Planning Commission,

My name is Jacky Chai and I am currently a Senior at Eleanor Roosevelt High School. I am writing to you in support of CPC's headquarters, CPC One Project. If approved, the new building will mean that there will be more space for not only the program I'm currently in but also all the other departments that help the overall community from the little toddlers all the way to the elderly. In our current space, all the staff are situated in one tiny room with barely any walking space not to mention the lack of ventilation due to the absence of windows. This is not only a safety issue in terms of the high risk of tripping over things constantly but also a health risk due to the fact that if we are in such close proximity at all times if one person was to fall sick, chances are the virus is going to spread to everyone sooner or later. To add, due to the lack of space, our program shares the same space with other programs such as the adult literacy classes. What this means is that people who come early before regular programming, are left with nowhere to go in order to wait for programming to start. Additional programming space would mean that students who come arrive early from school have space available to them as soon as they arrive.

In my third year of high school, I joined CPC's Learn and Earn, a program that helped me step into the harsh reality of the real world by training us, preparing us with financial literacy and work readiness workshops. It was here that I gained a sense of community and developed many meaningful relationships. I had come to learn the importance of advocacy and getting my voice heard. I began to believe that I could make a difference in someone else's lives if all it takes is just for me to speak my thoughts and put myself out there. I had, in turn, also created a world outside of my family that I love.

Thank you for taking the time to read my letter on why it is crucial for CPC to have their own headquarters and how the additional space would benefit individuals residing at the Lower East Side. Even if I may not live in the Lower East Side, my second home is with CPC and I hope that we can expand to a larger space in order to help more people in our neighborhood who may need the programs CPC provides.

Sincerely,



Jacky Chai

Jason Lin
17 Pike Street
NY, NY 10002
Linjason987@gmail.com

NYC Department of City Planning,
City Planning Commission
120 Broadway, Concourse Level,
New York, NY 10271

December 10, 2019

RE: In support of CPC One Project at Lower East Side

Dear City Planning Commission,

My name is Jason Lin currently, a Freshman at University at Buffalo, and I'm writing to you in support of CPC's headquarters, CPC one project. CPC is a place where students can have fun or a place where they can study. Since CPC must share a space making many things are limited. We can't be loud all the time, can't do certain events because other people in the building reserved the room, and the place is always full of people because many participants come daily. If CPC has its own building, problems that are listed above can be resolved. CPC staff can fully utilize their space into participants. Participants can have more fun and bonding time with one another without worrying about other parties. Also, having more space, participants can comfortably do their homework or study for their exams. Participants are the ones who will lead the future, and having space will help them.

When I first joined Learn and Learn, previously known as In-School Youth Program, I was excited. I looked forward to all the events and meeting new people. They didn't let me down but instead exceeded my expectations. The staffs were kind and caring. They planned college tours that helped me decided what college to attend. By being in L&E, I met many people that have become good friends, and get opportunities like SYEP and SIP. Being in L&E has helped me mature a lot. L&E is now my second home, and I am delighted that this has happened.

Thank you for taking the time to read my letter on why it is crucial for CPC to have their own headquarters and how the additional space would benefit individuals residing at the Lower East Side.

Sincerely,


Jason Lin

Jenny Ho
216 18th Street
Brooklyn, NY 11215

NYC Department of City Planning,
City Planning Commission
120 Broadway, Concourse Level,
New York, NY 10271

December 10, 2019

RE: in support of CPC One Project at Lower East Side

Dear City Planning Commission,

My name is Jenny Ho, currently a senior at Millennium High School. I am writing to you in support of CPC's headquarters, which will provide more space for community members who receive services from CPC, including the youth that come to programming everyday. Expanding program space invites more youth to come to CPC by providing adequate space to learn.

I have been apart of CPC's Learn & Earn program for over a year. The program has opened doors for me to new opportunities and experiences that sparked immense personal growth. As a result, I gained more experience to develop skills in public speaking, leadership, cooperation, and communication. This program gave me my first job, taught me how to write a resume and thank you letter, interviewing skills, financial literacy, and also helped me explore college campuses. The staff provides us with emotional and social support. More importantly, as adults, they are our mentors, helping us make good decisions, teaching us how to constantly improve ourselves, and and aiding us in the transition to adult life.

Thank you for taking the time to read this letter and hear how CPC had impacted me personally. Learn & Earn truly changed my life and I would have never imagined that I would grow this much as an individual. Providing more office space benefits the entire community, including the low-income, immigrants, New Yorkers, and the AAPI community.

Sincerely,

Jenny Ho



Jersey Liu
60 Pitt Street, 7E
New York, NY 10002

NYC Department of City Planning
City Planning Commission
120 Broadway, Concourse Level,
New York, NY 10271

December 11, 2019

RE: In support of CPC One Project in Manhattan's Lower East Side

Dear City Planning Commission,

My name is Jersey Liu. I am currently a Senior at Brooklyn Technical High School and I'm writing to you in support of the CPC One Project. Additional space in the Lower East Side would be really beneficial for staff, programming, and youth.

Recently, programming has been moved from the basement to the second floor, and the allotted space has increased slightly. Despite having access to a space that youth can use to study, hangout, and rest, the room is first occupied by an ESL class. This space occupation is followed by a problem that we have been experiencing, where the space is shared but cannot be shared at the same time. Additional space in the Lower East Side would be able to help solve this problem, the youth would not be blocked out of a space that they are welcome in, and programming would have more space to do activities and events.

When I first joined Learn & Earn, I had low expectations. I had thought that the program was simply something that just helped students with college preparation. However, these expectations were very wrong. Learn & Earn was a place for youth to grow and share experiences. I've learned many things that were related to college readiness, but also not related to college. I've learned about financial literacy, work readiness, work attire, and many more topics that could help prepare me for the future after college.

The Summer Internship Program that accompanied Learn & Earn has left a lasting impact on me as well. The time that I spent at CPC Project Reach has helped me expand my perspective about racial and social problems. Rather than learning in workshops, we actually had to prepare our own! This experience, unalterable, really helped me shape habits and correct those that were bad habits.

I would like to thank you for taking the time to review my letter regarding why I think it is necessary for CPC to have our own headquarters, as well as how the additional space would be good for individuals that live at the Lower East Side,

Kind regards,



Jersey Liu

Lily Tang
85 Elizabeth St. Apt #7
New York, N.Y. 10013

NYC Department of City Planning
City Planning Commission
120 Broadway, Concourse Level
New York, N.Y. 10271

December 9, 2019

Dear City Planning Commission,

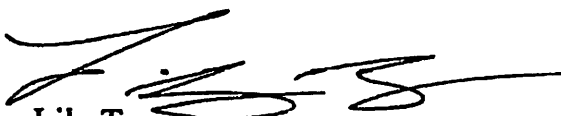
My name is Lily Tang, and I am currently a sophomore at Binghamton University. During my junior and senior year of high school, I was active in CPC's after-school program called ISY (now called Learn and Earn). I am writing to you in support of CPC's headquarters, CPC One Project.

I remember the cramped space in CPC's current location on Eldridge Street, a cramped basement with rows of cubicles. People were always saying, "excuse me" in order to navigate through it. The staff would constantly get from their seats to make way for people to walk in and out of the office. The dining area was in the back—one large table with a few chairs, next to boxes of storage. Our programming space was upstairs, one room suitable for at most, twenty people. Despite the tight space, CPC successfully held recreational events as well as educational events for us. I can only imagine that if there were more space, programming would have been much better and more comfortable for both participants and the staff.

Being the first person to attend college in my family, ISY provided me with endless support during the college application process. Through ISY, I was able to go on college tours, learn time and financial management, explore careers, and volunteer for various organizations—intangible experiences that I would not have if not for CPC. The future participants of Learn and Earn and the staff of CPC deserve the approval for CPC One Project.

Thank you for taking the time to read my letter on why it is crucial for CPC to have their own headquarters and how the additional space would benefit individuals residing at the Lower East Side.

Sincerely,



Lily Tang

From: [Alice Wong](#)
To: [19DCP119M_DL](#)
Subject: Translation: Testimony from Community member
Date: Wednesday, December 4, 2019 5:07:51 PM

TWIMC: Please see the line by line translation from the community member who spoke at the GO Broome hearing this morning.

Hello! Everybody! My name is Yu Zhu Zheng. Today I am very happy to share my story with this big family CPC. I migrated to United States in 2003. Everything started from zero to my family and me. Because of extreme low housing condition and language barrier, I was under a lot of pressure. My life then was not easy, and I was very frustrated. My mood was always very bad. At that time, a news article mentioned CPC's psychology counseling. As a result, I met CPC Senior Service Center Coordinator Ms. Chen. She helped me and introduced me to CPC Senior Service programs. At CPC, I got the opportunity to meet many new friends. Since then, I started to like CPC. I started coming here every day. The workers here and volunteers are very warm-hearted and care about elders' health especially. They arranged for us to listen to all kinds of speeches. They also held all kinds of classes, such as drawing, English and signings, etc. I preferred drawing and singing classes. Because the space was small, we can only hold class separately and people need to wait in line. We elders learned much actual knowledge and life experience. Now I feel better and am in much better health. I became a United State citizen with CPC's citizen instructors' help and proudly voted. The residents in our community find CPC very helpful. It is a very good helper of the community. The restraint of helping more elderly people is that CPC has limited space. Today, the main purpose of me is to let you know CPC have warm-hearted personnel and great community service for the elderly. CPC creates positive changes for the new immigrants. We hope, the senior housing condition can be supported and improved. This would be great news. It has been our main issue. In addition, we hope that you can continue support CPC Senior Housing project and senior services. Thank you all.

--

Alice Wong

Chief of Staff

she/her

Chinese-American Planning Council, Inc.

150 Elizabeth Street New York, NY 10012

T: 212.792.5330

F: 212.966.8581

www.cpc-nyc.org

Advancing Our CommUNITY



**New York City
City Planning Public Hearing
Draft Environmental Impact Statement (DEIS)
December 4, 2019**

LiveOn NY Testimony in support of GO Broome Development Project

LiveOn NY is a nonprofit membership organization representing 100 community-based organizations serving older New Yorkers, including operators of senior centers, home-delivered meals, HUD 202 buildings and other affordable housing options for seniors, all with the goal of making New York a better place to age.

LiveOn NY is proud to support the GO Broome Development Project and our member, the Chinese-American Planning Council, and partners in their endeavor to bring more affordable senior housing and community space to Manhattan's Community Board 3.

In 2016, LiveOn NY found more than 200,000 older adults to be languishing on waiting lists for affordable senior housing through the HUD202 program alone. The wait for a unit under this program averaged a jarring seven to ten years. Additionally, there currently an estimated 2,000 homeless older adults in New York City. A recent study by the University of Pennsylvania found that this number is likely to triple to roughly 7,000 older adults experiencing homelessness by 2030 without significant intervention.

One of LiveOn NY's members recently completed construction on an affordable senior housing building in Queens. The building received more than 35,000 applications for less than 100 units, averaging 522 applications for every one unit available. This example is not unique and plays out in communities across the five boroughs, highlighting the significant housing crisis we are in the midst of.

Given this need, we are proud that CPC's proposal includes 115 new, affordable homes for seniors. We know this is no small feat, and recognize the importance of each component of the project in making these units possible.

LiveOn NY is also excited to see the opportunity for CPC to gain a new headquarters through this development. CPC is a longstanding, high quality service provider in lower Manhattan, going above and beyond in support of the clients they represent.

At LiveOn NY, we look forward to one day sharing the opportunity for seniors to apply to this sorely needed affordable senior housing development, and we know that there will be no shortage of older applicants desiring to call the building home.

Thank you for the opportunity to testify in support of CPC and this incredible opportunity for lower Manhattan.



December 3, 2019

New York City Planning Commission

120 Broadway, 31st Floor

New York, NY 10271

Re: Public Hearing for Broome Street Development Project

To Whom This May Concern:

I am writing in support of the GO Broome Street Development proposed by the Gotham Organization ("Gotham") and the Chinese-American Planning Council ("CPC"). The 488 residences within the proposed development will include a set-aside of 208 permanently affordable housing units, which the city desperately needs to combat the ongoing affordable housing crisis. The affordable housing component includes 93 units set aside for Mandatory Inclusionary Housing (MIH) and 115 Affordable Independent Residences for Seniors ("AIRS") units, equating to ~43% overall affordability at a 53% average AMI. In addition to the substantial affordable housing component, the project will also include 44,000 square feet of community facility space, providing permanent facilities to the Chinese-American Planning Council ("CPC") and the Beth Hamedrash Hagadol ("BHH") Synagogue, two important Lower East Side non-profit organizations as well as a new revenue stream for supporting social services that benefit underserved New Yorkers.

By way of background, Breaking Ground was founded in 1990 to provide permanent supportive housing to individuals experiencing or at risk of homelessness. Since then, the organization has grown into the City's largest provider of supportive housing, with over 4,000 apartments in New York City with additional housing in upstate New York and Connecticut. For Breaking Ground, supportive housing means providing affordable apartments coupled with wraparound services designed to help residents maintain their homes for the long-term. In addition to providing housing, onsite services at Breaking Ground's buildings include benefits assistance, primary medical care, mental health care, substance use referrals, and skill-building and self-sufficiency programs. Breaking Ground is furthermore responsible for the largest above-ground street outreach initiative in New York City to connect the longest term unsheltered homeless with housing and other life-saving initiatives. Through these programs, Breaking Ground annually serves more than 8,000 vulnerable New Yorkers.

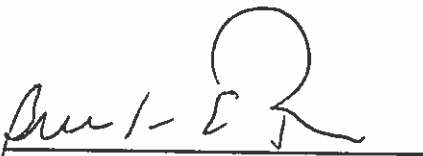
Breaking Ground has a close relationship with Gotham. David Pickett, President of Gotham, has been a long-term Board Member of Breaking Ground. David's personal dedication to providing affordable housing solutions is evident based on the amount of personal time and philanthropy he commits to Breaking Ground. Crucial to his involvement has been providing us with his development experience to ensure the successful execution of our projects and fundraising to further our mission.

Based on our extensive experience working with David and our knowledge of Gotham's track record as a leading developer of mixed-income private-public partnerships, we fully support Gotham's proposed development. Gotham has a well-established, highly regarded track record of working with non-profits to effectuate developments, and we believe that this experience will ensure that CPC and BHH are provided with best-in-class permanent facilities in Gotham's new site.

As a non-profit organization providing housing and a host of services, we understand the importance of providing non-profits with permanent facilities and certainty in their future funding sources. In our current climate where public sources of capital for non-profits are insufficient to meet demand, it is imperative that developments such as GO Broome Street help address the need for more affordable homes. We understand that this proposed project will have the added benefit for ensuring that CPC, through Gotham's annual ground rent payments, has invaluable funding to extend its vital services to more community members than would otherwise be possible. As a leading housing provider for New York's most vulnerable, and nonprofit with limited resources to conduct our important social benefit purpose, we see first-hand the how the dual purpose of this project – to provide additional affordable housing and a new funding stream for services to be an extremely precious opportunity for New York City. And as such, we again urge approval of the GO Broom Street development.

I am available to speak at any time should you have questions about the above or want more information of my experience with Gotham, with David Picket or any other reason at the contact information below.

Sincerely,



Brenda Rosen

President and CEO

212-389-9356

brosen@breakingground.org

**Testimony of Scott Short, CEO of RiseBoro Community Partnership
Dept. of City Planning Hearing on Broome Street Development
December 4, 2019**

RiseBoro is a 45 year old nonprofit community development company based in Brooklyn. We specialize in developing affordable housing for our most vulnerable populations, especially senior citizens, and surrounding that housing with community services that empower people to improve their lives. We are currently partnered with the Gotham Organization on a major mixed-use project on the Long Island City waterfront that will bring nearly 850 permanently affordable apartments for senior citizens, formerly homeless, and a range of incomes as low as 30% of AMI. Through this experience we have come to know Gotham as a highly competent, responsible, and civic-minded developer that shares RiseBoro's commitment to using real estate projects as a catalyst for thriving communities.

I testify in favor of Gotham and Chinese-American Planning Council's Broome Street application today not as someone who has any direct financial interest in the proposed development, but as a concerned citizen who wants to see the tools of our government used to promote equity and inclusion in our city. I believe that the project before you is unquestionably the highest and best use of the site, and will deliver an impressive range of community benefit, including an inclusive mix of affordable housing and permanent homes for two critical community institutions. Projects like these are anchors that can help preserve the strength and diversity of our neighborhoods in times of change. It is these types of projects that government should be prioritizing and supporting to ensure the future of our city.

Based on my belief in the merits of the proposed Broome Street project and my knowledge of the Gotham Organization as a responsible civic-minded developer, I urge you to approve the application before you. Thank you.

**Testimony
Regarding the
Broome Street Development**

Hello and thank you for the opportunity to speak in support of the Broome Street Development Project. My name is Lillian Wu and I am the Program Director of Hamilton Madison House – Smith NORC.

Hamilton-Madison House is a non-profit settlement house established in 1898 to improve the quality of life for NYC. Located in Chinatown/Lower East Side Two Bridges neighborhoods, we foster the well-being of vulnerable populations including the elderly, children, the ill and handicapped, new immigrants and refugees and the unemployed.

We have known and partnered with Chinese American Planning Council (CPC) for years as a fellow social services nonprofit in the Lower East Side. As fellow nonprofits, we fight side by side every day to provide social and economic empowerment to people throughout New York City. As many know, a key problem in our community is the lack of affordable housing especially for the elderly. It is not only a problem for low-income seniors but also middle-income seniors who “age into poverty” as a result of medical bills or other factors including long-term unemployment or loss of a second income. Many seniors living alone spend more than half of their income on rent. As the population continues to age, more individuals are in need of affordable housing but the waiting lists for available units can be as long as ten years. We must find opportunities to create affordable housing and The Broome Street Project is a vital opportunity to provide desperately needed affordable housing for the elderly.

We believe that by providing robust affordable housing and new homes to CPC and Beth Hamedrash Hagadol (BHH) Synagogue, the Broome Street Project will enable institutions with deep roots in our neighborhood to stay here and continue serving its people. As the Lower East Side changes rapidly, it is paramount that community based organizations such as Hamilton Madison House and CPC take an active role in the development of the neighborhood.

As many of our peers have and will attest, this project is a welcome addition to the neighborhood. It is for all of these reasons that we are happy to be supporting the Broome Street Development Project.

Thank you for your time and consideration.

Go Broome Testimony

Good evening. My name is Jennifer Vallone and I am Associate Executive Director of Adults, Arts, and Advocacy at University Settlement. University Settlement is the first and oldest settlement house in the country; as such we are committed to providing community based, holistic programming to all members of the communities we serve through programs aimed at the needs of very young children to older adults and all ages in between.

Today I would like to share our support for the Chinese-American Planning Council's *Community at Broome* project. A project that will allow our CPC neighbors to expand and solidify their good work for our Lower East Side community by focusing on vital services to the neighborhood.

CPC has been dedicated to the social and economic empowerment of LES and Chinatown residents since its founding in 1965. *The Community at Broome* project seems like a natural extension of CPC's mission with its focus on expanded intergenerational programming and services for those most in need, especially our elderly – a growing population that requires our collective and deep attention right now. For example, the development of the Community at Broome will allow CPC to provide a permanent home to many of their programs, currently reliant on rental spaces and at the whim of market forces, including their social service programs, college counseling, adult literacy, and community health services. Enhancing, expanding, and consolidating such services in a permanent home for CPS is a win for our area.

We know that the neighborhood is exhausted by the constant and disruptive development happening in the Lower East Side. We are tired of it too! But it is more exhausting for so many of our vulnerable neighbors to be unstably housed or even homeless. The CPC *Community at Broome* project will provide

488 new rental units, 43% of which will be permanently affordable and open to residents starting at 30% of AMI (considered extremely low income). The average is apartments available to residents with income of 53% AMI (or low-income). One hundred and fifteen units will be permanently affordable for seniors and 93 will be permanently affordable for individuals and families. We all know that permanent affordable housing is vital to NYC and to keeping our long-term neighbors in our communities. Yet New York City has lost almost 152,000 rent stabilized units in the last few decades – the most deregulation in the last 10+ years in the Upper East Side, Lower East Side, and the East Village. The median rent in 2017 for a rent stabilized apartment was \$2,685 according to the New York City Rent Guidelines Board 2018 report. This means that our long-term neighbors have far fewer protected housing options available to them and the remaining options are far far too expensive. Projects such as the *CPC Community at Broome* will ameliorate some of this growing disparity.

For these reasons, and others such as the thoughtful development of small retail spaces (enough with the big box stores!) University Settlement urges the City Planning Commission to support CPS's *Community at Broome* project.

大家好：我是鄭玉珠，今天很高興和大家一起分享我和CPC這個大家庭的親身體會。我于2003年移民到美國、作為新移民。一切從零開始。我和我的家人。因為住房條件特差、以及難以克服的語言障礙，壓力特別重，那段生活相當不容易，我很迷茫，心情糟透了。這時一份報紙的信息（Chinese-American Planning Council）簡稱CPC有心理輔導，就這樣我認識CPC長者服務中心的陳小姐。她幫了我，且介紹我來CPC長者服務中心。在這不起眼的地方，我們有機會認識許多跟我們相似的長者朋友。從此，我愛上了CPC，幾乎我每天都會來CPC。這里的工作人員和志願者都會很熱情特別關心長者的身心健康。讓我們聽各種有益長者的講座，還辦各種學習班，如画画、英文，唱歌等等。畫畫和唱歌還是我的最愛。因地方太小，只能分批參加，排隊等候，我們長者從中學到許多知識和生活在這里的需求。現在我感覺好了許多，也少生病。我在CPC入籍班的老師幫助下順利成為美國公民，也是自豪地加入選舉行列。我們社區居民有什麼事差不多都找CPC，她成為Brooklyn社區的好幫手。CPC雖然很好遺憾的是不能让更多像我一樣的長者，都有機會參加，就是因為地方太小。不能容納更多需要幫助的長者。今天主要的是，我想讓大家知道，社區和長者是多麼需要CPC這樣能真心的，實在的幫助我們大家的服務機構。也是期待有關部門能夠為我們長者提供負擔起的住房。這將是我們最大的福音。因為長者負擔和顧慮最多的是有一個穩定可負擔起吃住處。希望你們繼續支持CPC長者住屋和長者服務。謝謝大家

Holly Kaye
Planning and Development Consultant
365 West 25th Street, Suite 18J
New York, New York 10001
(212) 677-5910 • cell 917-406-5199
hokaye@aol.com

To the New York City Department of City Planning,

My name is Holly Kaye and it is my honor to submit this testimony in support of the Go Broome application. I regret that due to prior commitments, I cannot be here in person. My name may be familiar as a former staff person right here at DCP, where I started my professional career in 1970 and stayed for 11 years. Since 1981, I became a Planning and Development Consultant, spending nearly 40 years assisting community-based non-profits in the fields of historic preservation, local economic development and affordable housing throughout New York City and have had many clients here on the Lower East Side.

Further, I was founding Executive Director of the Lower East Side Conservancy begun in 1998 and still in operation, formed with the major goal of fundraising for the many Lower East Side synagogues confronting mounting capital needs and dwindling congregations. I'm very proud that we were able to raise almost \$6 million to support these sacred sites in the four years I ran the organization. In fact, one of the spurs to the Conservancy's formation was the clearly visible need when Beth Hamedrash Hagadol's multi-story main window blew in during a summer storm. With an emergency grant of \$5,000, we assisted in the window's replacement.

I have had the privilege and honor over these last two decades to work with the esteemed and iconic Hebrew scholar, Rabbi Ephraim Oshry and, after his passing, with the current Rabbi, Herman Greenbaum - helping them both with the preservation and restoration of the beloved and significant Beth Hamedrash Hagadol. (BHH).

Over the years, several schemes to re-purpose this important structure – built in 1850 – were developed and partially funded but due to unfortunate timing, either the City had a budget crisis or the severe post-2008 'recession', funds were either withdrawn or curtailed.

Finally, with the start of Essex Crossing, a collaboration between BHH, Chinatown Planning Council (CPC, owner of adjacent lots) and the Gotham Organization was arrived

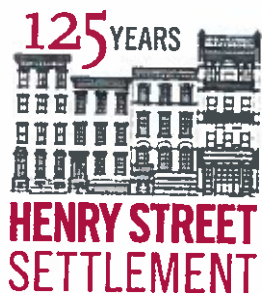
at, whereby the building would be preserved and adaptively reused as a community facility with space reserved for use by the BHH, as part of the larger overall development.

Tragically, these plans evaporated after the blazing fire that destroyed the entire structure more than two years ago, due to the mischief of several local youth. After the conflagration, under Rabbi Greenbaum's steadfast leadership, the vestige of the BHH congregation did not give up and were able to reposition their agreement with the partners, to preserve as much as possible of the ruins and to secure a significant amount of space within the new development for use for the needs of its members and the larger community. (Once again, tragedy struck in October of this year, when the remaining portions of the structure collapsed during demolition.)

In addition to the new market-rate housing they will build, Gotham Organization will create more than 100 permanent senior affordable apartments on the BHH site with the first floor to be developed for BHH use. Gotham is also partnering with CPC to create over 40,000 sq. ft. of community facility use, much needed by the local Chinese community.

This is a not the letter of support I expected to write because I still can't believe 170-year old BHH is no more. At least we can retain its presence by creating a memorial that will be contained in this new development. I strongly urge you to approve this application.

A handwritten signature in cursive script, reading "Gully Jaye", followed by a long horizontal flourish line.



265 Henry Street
New York, NY
10002-4808
ph: 212.766.9200
fx: 212.791.5710
henrystreet.org

New York City Department of City Planning
120 Broadway, 31st Floor
New York, NY 10271

To Whom it May Concern,

This letter is written to express Henry Street Settlement's full support of the Broome Street Development Project.

The Henry Street Settlement was founded in 1893 by social work and public health pioneer Lillian Wald. The Settlement's administrative offices are still located in the original federal row houses on Henry Street while programs are now operated out of 18 sites throughout the area, all within significant proximity to the proposed project. Each year, the Settlement provides more than 50,000 New Yorkers with a comprehensive continuum of services including: Education & Employment, Transitional & Supportive Housing, Health & Wellness, and Visual & Performing Arts. Clients include low-income individuals and families, survivors of domestic violence, children and young adults, individuals with mental and physical health challenges, senior citizens, and arts and culture enthusiasts.

Henry Street Settlement is proud to support the Chinese-American Planning Council (CPC) and Gotham Development on this project. In the past several years, we at the Henry Street Settlement have seen residents and seniors of the neighborhood distressed by the lack of affordable housing and at increased risk of displacement. The Broome Street Project will present the opportunity to provide desperately needed affordable units for seniors. The project will also create a new CPC headquarters and intergenerational community center and the redevelopment of the Beth Hamedrash Hagadol Synagogue (BHH) property.

Moreover, the CPC has consistently partnered with us in meaningful ways and have approached bringing additional services to the neighborhood with the commitment to coordinate and collaborate as opposed to compete, which will result in maximum benefit for the community. We intend to continue and deepen our partnerships with CPC and our sister settlement houses in the neighborhood as we work to connect residents with the services that will best enable them to lead healthy, productive, and satisfying lives.

The Broome Street Development Project is a welcome addition to the neighborhood and we are proud to express our support for the project.

Sincerely,


David Garza
President & CEO





華僑社會福利社
IMMIGRANT SOCIAL SERVICES, INC.

137 Henry Street, New York, N Y 10002

Tel: (212) 571-1840 • (212) 571-1848 Fax: (212) 571-1848 • (212) 571-1680

Testimony
Regarding the
Broome Street Development

Hello and thank you for the opportunity to voice my support for the Chinese American Planning Council (CPC) Broome Street Development Project. My name is Beatrice Chen and I am the Executive Director of Immigrant Social Services, Inc. (ISS).

Founded in 1972, ISS had the foresight to not only provide vital immigrant services to the Lower East Side/Chinatown neighborhood but focused much of its work on the children of immigrants. Located on Henry Street, once a central corridor of the Jewish community, it is now a key pathway within the Fujianese community and a stone's throw to the heart of the Cantonese-speaking historic Chinatown. Our work with the children of immigrants – providing afterschool academic, cultural, and enrichment programs, mentoring, counseling, and safe haven social and athletics activities and environments, have been key not only in delaying, limiting and preventing the youth from engaging in risky and destructive behaviors, but also nurturing multiple generations of upstanding citizens, role models and leaders of the Chinese American community locally and nationally.

We have worked alongside and in partnership with CPC as a fellow social services nonprofit in the Lower East Side to build an accessible network of services that can facilitate the resolution of many issues that confront the immigrant family unit.

With CPC's deep roots in the community and as a trusted entity founded by Asian Americans for Asian American, immigrant, and low-income communities in New York City, we believe that CPC's Broome Street Project will further benefit and empower the families and individuals we serve. The Project also addresses pressing needs of our community, including affordable housing that meet the needs of the low-income residents and seniors living on fixed incomes. The long-deserved permanent homes for CPC and Beth Hamedrash Hagadol (BHH) Synagogue will enable them to offer a continuum of services for multigenerational community members throughout their life. What better way to engage in neighborhood development with our community's best interest in mind.

We are pleased to support the Broome Street Development Project. Thank you for your time and consideration.

Beatrice Chen
Executive Director



The Community Preservation Corporation
220 East 42nd St, 16th Floor
New York, New York 10017

December 2nd, 2019

New York City Planning Commission
120 Broadway, 31st Floor
New York, NY 10271
Re: Public Hearing for Broome Street Development Project

To Whom This May Concern:

I am writing to provide support for the Gotham Organization and the Chinese-American Planning Council's proposed *GO Broome Street* development. The project's 488 residences will provide up to 208 permanently affordable housing units, resulting in a property that is roughly 43 percent affordable overall. Ninety-three (93) of the permanently affordable units would be set aside under the Mandatory Inclusionary Housing program, and would be available to low-income families and individuals. The other 115 permanently affordable units would be set aside under the Affordable Independent Residences for Seniors program which serves low-income senior citizens. This would result in the units averaging a deeply affordable 53 percent of Area Median Income.

In addition to the affordable housing component, the project will also include 44,000 square feet of community facility space, providing permanent homes for two long-standing, non-profit Lower East Side entities, the Chinese-American Planning Council (CPC) and the Beth Hamedrash Hagadol Restoration Corporation (BHH) Synagogue.

By way of background, the Community Preservation Corporation was founded in 1974 to provide a solution to the issues of property abandonment and blight that were prevalent in New York City at that time. Since then, our organization has grown into a leading nonprofit affordable housing and community revitalization finance company, working with government agencies, local community groups, banks and other lenders to create customized loan opportunities for our customers to ensure the creation and preservation of high-quality, affordable homes. The Community Preservation Corporation is now one of the nation's largest Community Development Financial Institutions (CDFI) dedicated to investing in multifamily housing, having invested more than \$11 billion to finance the creation and preservation of 196,000 units of housing in New York State and the Northeast U.S.

As a non-profit affordable housing and community revitalization finance company, our organization understands the importance of the *GO Broome Street* development to the long-term health and vitality of the Lower East Side community. In addition to creating a significant amount of deeply

affordable intergenerational housing, it will also provide two local non-profit organizations, CPC and BHH, with the requisite financial resources to ensure they can continue to serve the residents of the community for years to come. The key component pieces of the *GO Broome Street* development – the affordable and market rate housing components, community facility programming, and retail stores – come together as a cohesive whole to create an ecosystem that gives all New Yorkers the opportunity to thrive.

It is imperative that *GO Broome Street*, and projects of a similar caliber, receive support as they are instrumental in expanding the City's affordable housing stock and maintaining the ongoing viability of non-profits that support the community, both components that contribute to a more equitable and thriving New York City.

Sincerely,

A handwritten signature in black ink, appearing to read 'RCE', is positioned above the printed name.

Rafael E. Cestero



FOR YOUTH DEVELOPMENT
FOR HEALTHY LIVING
FOR SOCIAL RESPONSIBILITY

Michael Keller
Executive Director

November 27, 2019

Marisa Lago, Chair
NYC City Planning Commission
120 Broadway, 31st Floor
New York, NY 10271

Re: Broome Street Development Project.

Dear Chair Lago,

I write in support of the Chinese American Planning Council's partnership in the Broome Street Development Project.

As you may know, the YMCA of Greater New York is committed to empowering youth, improving health, and strengthening community. The Chinatown YMCA provides programs aimed at addressing critical issues in our community, such as childhood obesity, diabetes, and social isolation. In order to accomplish this mission we collaborate with many other non-profit organizations in the social service sector, such as Chinese American Planning Council (CPC), to benefit and improve our community.

CPC has been dedicated to the social and economic empowerment of Chinatown and LES residents since its founding in 1965. The Community at Broome project is a natural extension of CPC's mission with its focus on expanded intergenerational programming and services for those most in need, especially our elderly – a rapidly growing population within Community Board 3. This project will allow CPC to provide a permanent home for many of their social service programs, such as college counseling, adult literacy, and community health services that would otherwise be at the mercy of the commercial rent market.

The Community at Broome will allow CPC to offer services in a centralized location that will be easily accessible, such stability is critical in providing quality social services. CPC is a trusted, reliable and

YMCA OF GREATER NEW YORK Chinatown YMCA 273 Bowery, New York, NY 10002
T 212-912-2465 F 212-777-0680 E mkeller@ymcanyc.org W ymcanyc.org/chinatown

transparent organization in a constantly changing and growing community. It is for all these reason why we continue to be partners, and why we support their Community at Broome project. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael", followed by a horizontal line.

Michael Keller
Executive Director

YMCA OF GREATER NEW YORK Chinatown YMCA 273 Bowery, New York, NY 10002
T 212-912-2465 F 212-777-0680 E mkeller@ymcanyc.org W ymcanyc.org/chinatown

City Planning Commission

Dec. 4, 2019

Members of the Commission

I am here to oppose a change in zoning from R-8 to R9-1 for the BROOME STREET DEVELOPMENT.

This site is just across from the new Essex Crossing development, which was planned with much community input. But this new Suffolk building with a 310 ft roofline height would be 25 feet taller than the highest Essex Crossing building at 285 feet and would be 2 ½ times higher than presently allowed. And it could go even 30 feet higher with the planned roof mechanicals.

This applicant also wants special permits for fewer setbacks, streetwall changes, minimum distances. Despite stringent zoning rules to build on narrow streets, this building, on a fairly restrained footprint, would abut two narrow cross streets. There would be no outdoor space. The totality of all of these requests just emphasizes that it is too much for this site.

This applicant notes that these changes are necessary for the viability of the project, so it can accommodate affordable housing and community spaces. These are commendable but this is not the place to put them. Yes, affordable senior housing is a desirable amenity, but our neighborhood already has a large share of this, in a dedicated Essex Crossing Building, in another one going up on Essex Street, and in other properties in the vicinity. Community space is also commendable, but 40,000 square feet (how many apartments is that?) seems excessive.

So, there are valid and compelling reasons to oppose this. A high, dense, bulky building on a narrow corner not in sympathy with its surroundings would result.

Unfortunately, the Borough President's Report approving this application was not sent to the public until yesterday. That vote to allow this makes short shrift of all the points raised here.

There are dozens of sites in this neighborhood that could be ripe for development. Is every developer going to be allowed to build higher and wider for more affordable apartments. Will every one of the many social service agencies here get new spacious office spaces? What will our neighborhood look like? What is zoning for if not for something like this?

I was hoping that someone, somewhere, in some place of authority, maybe here, would be able to see the failings of this proposal and not approve something that looks viable now but will be here for 100 years, and will always be a reminder that it didn't have to be. Maybe here.

There is NO reason to allow this.

I am asking you to keep the R-8 zoning.

Thank you,

Judith Prigal



**TESTIMONY FROM THE ASSOCIATION FOR A BETTER NEW YORK BEFORE
DEPARTMENT OF CITY PLANNING
DECEMBER 4, 2019**

Good Morning Commissioners,

The Association for a Better New York (ABNY) is a nearly 50 year old civic organization representing corporations, non-profit organizations, education/cultural/health institutions, unions and government authorities dedicated to promoting connections between the public and private sectors of New York City. We would like to express support for the proposal to develop and incorporate the remains of the Beth Hamedrash Hagadol Synagogue into a new mixed-use development that can continue to serve as a cultural center for the Lower East Side Community.

The tragedy of the 2017 fire of the Beth Hamedrash Hagadol Synagogue represents a loss of part of the cultural history of the Lower East Side, and unfortunately the subsequent structural integrity losses almost lead to the complete loss of the structure. However, the redevelopment plans proposed by the partnership between the Chinese-American Planning Council and the Gotham Organization which incorporated remains of the structure into a new mixed-use building represents more than architectural innovation and a respect for the City's history, it is also emblematic the dynamic neighborhood and communities and creative adaptive reuses of our community facilities.

We appreciate both CPC and Gotham's consideration of the exiting structure, as well as the incorporation of a new congregation space and cultural heritage center that will be accessible to the public. Additionally, we want to acknowledge the lengths to which both CPC sought, and Gotham designed a mixed-use structure that is so explicitly intended to maximize affordability, using this development to address a concern repeatedly expressed by Lower East Side communities, including senior and Asian-American Immigrant communities specifically.

The Chinese-American Planning Council is one of the nation's largest and most significant Asian American social services organization, serving the largest Ethnic Chinese populations of any city outside of Asia, and advocating for the needs and betterment of Asian Americans across the city. We are pleased that this redevelopment project will enhance this critical organization's ability to serve their more than 60,000 individuals and families, as well as provide resources for communities across the city.

ABNY fully supports the proposal for Go Broome and we appreciate the opportunity to testify this morning.



CHARLES B. WANG
COMMUNITY HEALTH CENTER
王嘉廉社區醫療中心

December 2, 2019

Re: Broome Street Development Project

Dear NYC Department of City Planning:

On behalf of the Charles B. Wang Community Health Center (CBWCHC), I am pleased to write this letter in support of the Chinese-American Planning Council, Inc. (CPC)'s mixed-use development project at 50 Norfolk Street. CBWCHC is an NCQA level 3 Patient-Centered Medical Home. We have sites in Lower Manhattan and Flushing, Queens, serving more than 60,000 patients with more than 300,000 service visits last year. Our mission is to provide high quality and affordable health care to the underserved, with a focus on Asian Americans.

CPC is a well-known provider of social services for high-needs populations in NYC and is a critical resource for linguistically accessible and culturally diverse programs throughout the five boroughs. We believe that providing affordable housing and space for local community based organizations is key to preserving the culture and landscape of our community. Over the years, CBWCHC staff have collaborated with and referred many clients to CPC. We look forward to the continued collaboration and growth of our positive working relationship with CPC. We are pleased to submit this letter in support of CPC's Broome Street Development Project.

Sincerely,

Jane T. Eng, Esq.
President and Chief Executive Officer



CHUNG PAK

松柏大廈

CHUNG PAK LOCAL DEVELOPMENT CORP.

City Planning Commission Testimony Regarding the Broome Street Development

Thank you for the opportunity to provide our unequivocal support for the Chinese American Planning Council's (CPC) Broome Street Development Project. My name is Charles Lai and I am the Executive Director of the Chung Pak Local Development Corporation.

The Chung Pak development is a 13-story complex that houses 14 retail businesses; a daycare/universal Pre-K center, a community health clinic and 88-HUD section 202 low-income senior housing units serving the extended Chinatown community. For the past 37 years, Chung Pak has been an integral part of the economic, social and service life of the neighborhood.

Chung Pak and CPC have a long history of partnership and collaboration. CPC is a founding member of the development of the Chung Pak complex and has played a critical role in the viability and stability of our organization since the very beginning. We are also proud to house CPC's daycare/universal Pre-K center in our complex for these many years.

We are well aware of:

- the desperate need for low income housing, especially for our elderly population, as we have well over 4,500 people on our own waiting list (for one of our 88 units). A few of our recent tenants waited over 25 years to obtain an apartment in our complex.
- the critical need for stable operating homes for non-profits. The successes and good work of the CPC Chung Pak Daycare center and the Charles B. Wang Community Health Center over these many decades have greatly strengthened the health and welfare of the entire community.

Chung Pak is thrilled to be able to take this opportunity to lend support to CPC's Broome Street Development Project to create desperately needed affordable low and moderate income, and senior housing units for the City's most vulnerable populations. Additionally, the long-awaited for permanent CPC headquarters will be vital for the continuing and smooth operations of a leading multi-social service organization. In total, this project when completed will provide truly significant benefits to the Chinatown/Lower East Side community and the entire City of New York. We support this project wholeheartedly.

Thank you for your serious and positive consideration for this important project.

Charles Lai
Executive Director



William G. Leung, Chair
TD Bank (Retired)

Jeffrey D. Leong, Vice Chair
Life Financial Management

Tony Wong, Treasurer
Wong & Co., CPA

Alison Yu, Secretary
Hearst Foundations

Deborah Chan, Esq.
Law Office of Deborah Chan, P.C.

Suzanne Goon Mark
Time Inc. (Retired)

David K. Ho, LMSW
1199SEIU

Hans Johannsen
Agricultural Bank of China

Chong Min Lee
Woori America Bank

Elizabeth Lee
Cathay Bank

Anne Louie
TD Bank

Patrick Ng
Po Wing Hong Food Market

Sunny Wang
Broad USA

Danny K. Wong
Customers Bank

Kevin Yu

Hong Shing Lee, LMSW
Executive Director

Stephanie Lau, MPA
Assistant Executive Director

CMP promotes economic self-sufficiency and career advancement, with a strong track record in supporting the Asian immigrant population

Testimony of Hong Shing Lee

Re: Go Broome Street Development Project Public Hearing on Draft Environmental Impact Statement (DEIS)

NYC Department of City Planning
120 Broadway, New York, NY 10271

Ladies and gentlemen, my name is Hong Shing Lee, executive director of CMP – Chinatown Manpower Project, Inc.

CMP is a workforce and economic development organization dedicated to promote economic self-sufficiency and career advancement of New Yorkers, particularly members of the Asian American community. Established in 1972, CMP has been providing work readiness, college guidance, vocational training, job placement, entrepreneurial assistance, and other educational and social services to our community.

CMP has been working closely with Chinese-American Planning Council (CPC) as colleagues, allies, and partners in improving the lives and well beings of the same community and population that both organizations are dedicated to serve.

CMP is hereby testifying in support of the Go Broome Street Development project, a joint effort between CPC, Beth Hamedrash Hagodol (BHH) synagogue, and Gotham Organization. When completed, the project will create a mixed use development with a dedicated senior housing, community space, and affordable housing out of a currently underutilized, private parking lot, as well as a vacant, and since fire damaged, synagogue. The project will add 488 new residential units in the Lower East Side community, of which, close to 43%, or 208 units, are affordable housing. In addition, the nearly 19,000 square feet of small format retail space in the mixed use building will support small businesses growth in the community.

All told, this project will benefit diverse members of the community. It will provide senior citizens and low to moderate income resident affordable living accommodations, offer job opportunities to working age adults, small business opportunities to entrepreneurs, and facilitate economic stability and growth in the community. It is a welcome development out of previously unused or underused space and therefore does not displace any current establishments. CMP would like to express our wholehearted support of the Go Broome Street Development project.

Thank you.

Community Board Land 3
Land Use Committee
Support for Go Broome Development project
Jennifer Vallone
September 17, 2019

~~Good evening.~~ ^{morning} My name is ~~Jennifer Vallone~~ ^{Monique Flores} and I am Associate Executive Director of ~~Adults, Arts, and~~ ^{Youth, Community + Arts} ~~Advocacy~~ at University Settlement. ^{I am also a neighbor since 20 yrs LES} University Settlement is the first and oldest settlement house in the country; as such we are committed to providing community based, holistic programming to all members of the communities we serve through programs aimed at the needs of very young children to older adults, and all ages in between.

Today I would like to share our support for the Chinese-American Planning Council's *Go Broome* development project. A project that will allow our CPC neighbors to expand and solidify their good work for our Lower East Side community by focusing on vital services to the neighborhood.

CPC has been dedicated to the social and economic empowerment of the LES and Chinatown residents since its founding in 1965. *The Go Broome* project seems like a natural extension of CPC's mission with its focus on expanded intergenerational programming and services for those most in need, especially our elderly – a growing population that requires our collective and deep attention right now. For example, the development of the *Go Broome* will allow CPC to provide a permanent home to many of their programs, currently reliant on rental spaces and at the whim of market forces, including their social service programs, college counseling, adult literacy, and community health services. Enhancing, expanding, and consolidating such services in a permanent home for CPC is a win for our area.

We know that the neighborhood is exhausted by the constant and disruptive development happening in the Lower East Side. We are tired of it too! But it is more exhausting for so many of our vulnerable neighbors to be instably housed or even homeless. The CPC *Go Broome* project will provide 488 new rental units, 43% of which will be permanently affordable and open to residents starting at 30% of AMI (considered extremely low income). The average is apartments available to residents with income of 53% AMI (or low-income). One hundred and fifteen units will be permanently affordable for seniors and 93 will be permanently affordable for individuals and families. We all know that permanent affordable housing is vital to NYC and to keeping our long-term neighbors in our communities. Yet New York City has lost over 152,000 rent stabilized units in the last few decades – the most deregulation in the last 10+ years in the Upper East Side, Lower East Side, and the East Village. The median rent in 2017 for a rent stabilized apartment was \$2,685 according to the New York City Rent Guidelines Board's 2018 report. This means that our long-term neighbors have far fewer protected housing options available to them and the remaining options are far far too expensive. Projects such as the CPC *Go Broome* development will ameliorate some of this growing disparity.

For these reasons, and others such as the thoughtful development of small retail spaces (enough with the big box stores!), University Settlement urges CB3 to support CPS's *Go Broome* development project.

Thank you for your time.



175 Delancey St.
New York, NY 10002
GRANDSETTLEMENT.ORG

**Testimony of Grand Street Settlement
Regarding the Broome Street Development**

Hello and thank you for the opportunity to speak in support of the Chinese American Planning Council's Broome Street Development project. My name is Elsa Pereira and I am the Managing Director of Operations of Grand Street Settlement. We are an historic settlement house that has been serving the Lower East Side since 1916. Like our sister settlement house partners at CPC we are committed to providing high-quality affordable housing and social services, and like our partners at CPC, we have an established history of advocating for our Lower East Side neighbors. We believe the Broome Street project will benefit our neighborhood, particularly our lowest income residents.

CPC's proposed Broome Street project will enable mission-driven institutions with deep roots in our neighborhood, like Grand Street Settlement, like CPC, and like Beth Hamedrash Hagadol (BHH) Synagogue to stay here and continue serving our neighbors. Grand Street Settlement's own experience with rapid growth in the neighborhood most recently culminated in our status as the community partner at Essex Crossing. At our Essex Crossing Community Center—which by the way is down the street from the CPC project at 175 Delancey Street—we provide culturally-competent supportive services and nutritional, educational, and recreational intergenerational and as well as senior-specific programs. We also run childcare and youth programs at Seward Park Extension at 56 and 60 Essex Street. We look forward to extending these programs and services for free to our new neighbors residing in CPC's Broome Street development.

Like Essex Crossing, we know that the Broome Street Development Project is the result of a thorough planning process that sought to maximize the number of affordable housing units. We recognize that there was a lot of effort put into engaging a diverse group of neighborhood stakeholders. In our experience, the long-term benefits of this type of project far outweigh the short-term inconveniences. As many of the low-income seniors in our residential building, as well as the dozens of young people who have graduated from our job training program at GrandLo Café down the street at 168 Broome can attest this project is a welcome addition to the neighborhood and has enriched and in fact completely changed the trajectory of their lives for the better.

GSS knows there is strength in alliances, and we're excited to work together to better serve our communities.

Thank you for your time,

Elsa Pereira

Managing Director of Operations and Coro Leadership NY Participant