



*Strengthening Homes,
Communities
and Lives*

May 5, 2017

Suzanne Cahill, Planning Director
Wayne Platte, Jr., Planning Board Chair
Kingston Planning Board
City Hall
420 Broadway
Kingston, NY 12402

Re: Application of RUPCO; Landmark Place (Revised p. 3, line 1)

Dear Ms. Cahill, Chairman Platte, & Members of the Planning Board:

This letter is submitted in support of the Planning Board's review of the referenced proposal as Lead Agency under the State Environmental Quality Review Act ("SEQR"). RUPCO has petitioned for rezoning of the referenced property (the "Property") and seeks site plan and special use permit approval in connection with its proposal to develop a sixty-six (66) unit residential housing campus, to include ancillary supportive services (the "Project").

The development and its related legislative and discretionary approvals, collectively, are the "Action" under SEQR. The Planning Board conducted a Public Hearing on February 28, 2017, and held the hearing open for written comment for a period. In addition, the Planning Board has considered numerous submissions by our project team related to the site planning and impacts of the Project, and, cognizant of the public comment and the environmental record before it, the Planning Board conducted a detailed review of the long Environmental Assessment Form ("EAF"). In this review, the Board identified certain moderate to large potential impacts.

Among the potential impacts cited by the certain participants in the public hearing process, are perceived potential adverse impacts on the character of the community, primarily focused on concerns about perceived safety and quality of life issues risks associated with the nature of the population intended to be served, and the mix of those populations with seniors on the same campus and with individuals and families in the surrounding community. In particular, the Project as initially presented would provide 35 studio and one bedroom permanent housing units to formerly homeless individuals, integrated on a campus consisting of a the rehabilitated Alms House and a new building. This letter is submitted in response to those concerns.

First, RUPCO notes that there is no credible substantive evidence in the record to support a conclusion that significant adverse environmental impacts on community health, safety or welfare can be associated with the formerly homeless populations to be served by the Project, nor can such a position be supported by credible data. Nothing herein should be construed to concede any such impact. On the contrary, substantial evidence has been submitted that the populations to be served (both currently homeless and seniors) are already present throughout



*Strengthening Homes,
Communities
and Lives*

our Kingston communities, and that the adverse impacts associated with the overwhelming housing gap for both populations in Kingston are far more adverse than any associated with the provision of dignified, permanent, housing to those populations. The latest data establishes that there are 165 homeless individuals in Ulster County being housed in shelters or in hotels at an average of \$91 per night, at taxpayer expense. Directly connected to their homelessness is the fact that they rely inordinately on emergency services because they do not have accessed to managed care or supportive services. In addition, the development of fair and integrated housing within communities is a legally protected principal articulated by both the New York State Court of Appeals and the United States Supreme Court.

Moreover, we note that as initially proposed, the management and operating staffing plan for this project will include 24 hour per day/7 days per week reception. The staff assigned to the reception desk will be responsible for monitoring both residents and visitors to the building. The Applicant will also employ an in-residence superintendent/caretaker. The Applicant's existing property management staff are already experienced in managing these populations through RUPCO's numerous existing housing developments. Case Management personnel and a full-time LPN will be dedicated to the campus to ensure the successful management of resident care and services.

Any concern as to pedestrian movement to or from the campus, and impacts on the neighboring community, are addressed by the traffic study, which indicates more than adequate access to major roadways and services via existing site entrances and site location, and a decrease in total trips to the site as well as decreased a.m. and p.m. peak traffic flow when compared to its most recent use as a County office site. It is noted that the proposal includes the provision of project owned vehicle shuttle to supplement resident access to City and County services and shopping, etc.

The site plan also contemplates significant on-site community space and passive indoor and outdoor recreation space for residents. Between the on-site amenities and the ready access to means of transportation to off-site services and retail needs, there is no reasonable concern as to the community character related to the development of the site, or its occupation by these, or any other, populations. The campus will also be sufficiently lighted to allow for safe monitoring of the project while not being obtrusive to the neighbors due to its generally pastoral and screened setting.

Finally, in order to be responsive to any concern as to the mix of the on-site senior and formerly homeless communities, RUPCO will modify the proposal such that the entire campus will be for seniors aged 55 and over. While we do not concede any significant adverse impact which might be alleged with respect to the mixed population originally proposed, we also note that the all-senior population will continue to serve a desperately underserved segment of our Kingston and Ulster County community, in that the project will provide 66 units of housing to a local senior



Strengthening Homes,
Communities
and Lives

community for whom no new housing has been constructed since 2001. Indeed, **25%** of homeless individuals in Ulster County are seniors. As the local Section 8 administrator, we can directly attest that of the +/-1800 Section applications received, more than one quarter of them are from seniors, and nearly half of those had Kingston zip codes. Therefore, the change in target population to all-seniors continues to meet our mission, serve the legitimate needs of the entire community to provide affordable, dignified and safe housing for seniors, and is responsive to public concerns as to the mixed-age population which were voiced in the environmental review process.

We thank the Board for its careful and comprehensive review of the impacts of the Action, and respectfully request that this letter, as well as all submissions of the applicant and its consultants, be made a part of the record for purposes of a determination of significance pursuant to SEQRA at its May 8, 2017 meeting. Please do not hesitate to contact me should you require anything further of us in the interim.

Very truly yours,

Joseph P. Eriole, Esq.
Vice President of Real Estate Development