

NEW HAVEN LEGAL ASSISTANCE ASSOCIATION, INC.

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November 5, 2015

Black and Hispanic Caucus
New Haven Board of Alders
165 Church Street, #2
New Haven, CT 06510

Dear Honorable Members of the Black and Hispanic Caucus of the Board of Alders,

We write with grave concern regarding the impending demolition of the Church Street South housing complex. We respectfully request to be placed on the agenda for your upcoming caucus meeting on November 9 to discuss the affordable housing crisis at hand.

Church Street South tenants have lived for too long with miserable conditions such as leaking roofs, faulty plumbing, broken boilers, and structurally unsafe staircases. They have suffered physical dangers from toxic mold and emotional despair. The Department of Housing and Urban Development, the City of New Haven, and Northland Investment Corporation (the owner of the property) have all stated publicly that the complex is functionally obsolete and needs to be demolished.

We are gravely concerned about the loss of the 301 "brick and mortar" affordable housing units. The 301 units at Church Street South are a critical component of our city's already insufficient affordable housing stock. These units are needed for housing for those of us who are unemployed, disabled, and working poor. The loss of these units would be particularly problematic given that they contain many of the scarce four and five bedroom apartments in town which are need for low-income tenants with more than two children and those with multiple generations living together as a family unit.

We write to you, as the Black and Hispanic Caucus, because this loss of affordable housing would disproportionately impact Black and Hispanic city residents. We hope that you will join us to insist that both Northland and the City commit to rebuilding 301 units of affordable housing. These 301 units can be built either on site or in an equally desirable neighborhood. On site, Northland or another developer could redevelop this valuable and critical piece of property as a large mixed income, mixed use housing and commercial development project. The many acre site could easily accommodate a large redevelopment project that included all 301 housing units, as just a fraction of the project itself.

In the alternative, Northland can transfer its 301 housing subsidies to other housing developers in town or in the surrounding suburbs. This would preserve the 301 subsidized units as part of our affordable housing stock. Northland can do so as a transfer of budget authority of its project-based Section 8 housing assistance contract under Section 8(bb)(1) of the United States Housing

Act of 1937. To do so, Northland and the City would identify other developers who seek to accept its subsidy and comply with the required transfer process.

We fear that Northland will neither rebuild 301 affordable housing units on site, nor transfer its federal subsidy to a different developer. Northland has stated that “the best and most efficient option would be to empower the residents with 100% portable vouchers.”¹ We disagree. The option suggested by Northland will violate federal law² and unjustly allow Northland to proceed as an unencumbered private developer of the Church Street South site.

While many families state a preference for portable vouchers, portable vouchers alone are not the solution to the present crisis at Church Street South. Vouchers can only work if safe and decent affordable housing options exist. Without a commitment by Northland and the City to replace the 301 units of affordable housing, there will be 301 more families competing for the already limited number of safe and decent affordable units on the market. We foresee that many of the Church Street South families will not find housing and be homeless, even with their vouchers in hand, unless replacement affordable housing stock is identified or built.

Thank you for your time and attention to this critical issue. We look forward to the opportunity to address you directly at your upcoming caucus meeting.

Sincerely,

A handwritten signature in blue ink that reads "Amy Marx". The signature is fluid and cursive, with the first name "Amy" and last name "Marx" clearly distinguishable.

Amy Marx, Esq.

Amy Eppler-Epstein, Esq.

Shelley White, Esq.

Yonatan Zamir, Esq.

New Haven Legal Assistance Association

¹ Church Street South New Haven, Connecticut Operational and Decommissioning Plan, September 15, 2015.

² Federal law prohibits termination of a project-based housing assistance payment contract without compliance with the rules for opting-out of such federal subsidy, which include a one year wait period prior to the termination of the contract, public hearings regarding the pros and cons of the termination of the contract, written notice to tenants, and provision of enhanced vouchers that pay additional rent on behalf of existing tenants to enable them to continue to remain in their homes even after their apartments convert to market-based rent.