



Jane B. Hornstein, Director
U.S. Department of Housing and Urban
Development Special Application Center
77 W. Jackson Blvd. Suite 2401
Chicago, IL 60604
Phone: (312) 913-8766
Fax: (312) 886-6413
Jane.B.Hornstein@hud.gov

Tenants of Harlem River Houses
with The United Front Against Displacement
theUFAD.org
nogonyc@riseup.net
646-780-9657
@theUFAD

Dear HUD Special Projects Center

Please do not approve NYCHA's application to convert Harlem River Houses through the RAD program, because 1) resident engagement was insufficient, 2) this project threatens tenant's well being, and 3) the RAD review process coincided with a pandemic which was doubly fatal for NYCHA residents as the city overall.

Harlem River Houses, built in 1937, is a designated historical landmark and one of the first federally-funded public housing developments in New York City. Despite NYCHA's claims of resident engagement, residents have been locked out of this process in a number of ways. At early meetings in which tenants were presented with the plan to convert the development, those that raised concerns about the proposal were forcibly removed from meetings. Subsequently, the tenant association president threatened that tenant organizers were trespassers and would be arrested, a clear violation of HUD rule 24 CFR 245.100. Such threats have created a culture of fear around the tenant participation process. The TA president was voted in by little more than 10 people in an election that was not widely publicized. Tenants have tried for months to retrieve the bylaws for the Tenant Association, including through repeated requests of the TA president, and of NYCHA. Despite a FOIL request to NYCHA for these over five months ago, NYCHA has not shared the bylaws.

Because of the pandemic, crucial meetings about RAD were held on Zoom, but many people don't have internet access, a reliable connection, or the hardware or skills needed to participate. Another barrier is language; critical meetings were held primarily in English, but many residents speak other languages such as Spanish and Chinese. As mentioned, many residents were excluded from essential meetings because of the concerns we raised about RAD.

Our concerns reflect our knowledge of RAD conversions at other NYCHA developments. After the RAD conversion at Ocean Bay Houses, new managers brought more than 300 eviction cases to court, and displaced 80 households. This eviction rate was twice as high as the second highest eviction rate among NYCHA developments during the same time frame. When a resident asked about this during a zoom town Hall with NYCHA and C&C Management, a NYCHA spokesperson responded that some of these tenants were evicted from Ocean Bay because of their refusal to sign the new leases. In this and other ways, Harlem River tenants are being intimidated into signing off on a deal that they don't support. During a deadly pandemic, dangling the threat of evictions to push a deal through is completely unethical.

The management companies chosen for RAD partnership have histories of tenant harassment and neglect, high rates of evictions, the abuse of public money and more. There is no way to construe that these partnerships are in the best interests of tenants. The private manager assigned to Harlem River Houses, C&C Management, has an awful reputation, Tenants in other C&C buildings have complained of rat infestations and floods, and have

said that the management company has been un-responsive to requests for repairs. C&C also has the second highest eviction rate in NYC.

Over 100 residents of Harlem River Houses signed a petition opposing RAD and Section 8 conversions. A lawsuit has also been filed in response to the intimidation tactics used by C&C management to force tenants to leases with private management (S.D.NY. Case No. 21-cv-4872). On Sunday, June 11, New York Senator Chuck Schumer said on the OneNYCHA podcast that RAD conversion should be halted at Harlem River Houses. In light of all this, we ask that approval of the RAD conversion at Harlem River Houses be suspended indefinitely.

Please contact us with any questions or for further discussion. Thank you for your time.

Sincerely,
Residents of Harlem River Houses
The United Front Against Displacement

A hard copy with signatures of Harlem River Houses residents is being mailed as well.