



Dear Syracuse Housing Authority Residents:

The Syracuse Housing Authority (“SHA”) has reviewed the NYSDOT’s Draft Environmental Impact Statement (“DEIS”) and the environmental justice (EJ) analysis prepared for the I-81 Viaduct Project that has chosen the Community Grid Alternative.

Although SHA is in support of the community grid alternativeⁱ there are some concerns that SHA has regarding the impact that the construction phase of the project will have on our residents, our operations and our employeesⁱⁱ. SHA residents are part of an environmental justice population and therefore NYSDOT must demonstrate that no disproportionality high and adverse effects would be predominately borne by SHA residents, in accordance with the provisions of Executive Order 12898 and FHWA Order 6640.23ⁱⁱⁱ.

Through recent meetings with residents, comments made during door to door visits and other comments received, SHA has drafted the following proposed list of mitigations that NYSDOT should provide to the Syracuse Housing Authority for the I-81 Viaduct Project. Please review the following proposed list of requested mitigations and contact SHA with any additional requests that you would like made or if you have any questions about the proposed list. You may also submit comments or requests directly to NYSDOT by using the comment form.

Proposed List Of Requested Mitigations

1. **Pre And Post Testing Of Residents** Of Pioneer Homes And Toomey Abbott Towers For Respiratory Illnesses now and after the removal of the I-81 Viaduct.
2. **Vouchers For Residents**^{iv} whose individual situations would be adversely impacted by the noise, air pollutants and possibility of being landlocked during the construction phase of the project and would need to be temporarily relocated.
3. **Construction Of A Temporary Road:** Due to the expected temporary lane closures and reconstruction of Almond Street during both phase 1 and phase 2 of construction as stated in the DEIS^v, Toomey Abbot Towers and the 144 units of Pioneer Homes that is on the east side of the I-81 viaduct could both potentially be landlocked with no means of egress. The 308 units at Toomey Abbot Tower, a 308 unit building for elderly and disabled residents is located at 1207 Almond Street and includes a 95 unit licensed Assisted Living Facility that is run by the ERIE program through Franciscan / St. Joseph’s and is licensed under the Onondaga County Health Department. To facilitate access for residents, medical and service providers, case managers, and emergency services to the east side of Pioneer Homes and Toomey Abbott Towers a temporary road to provide an additional means of egress is necessary. Any lane closures even temporary ones are not acceptable due to the vulnerable population of residents living in Toomey Abbott Towers and ERIE, the Assisted



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Living Program due to their physical and / or mental disabilities, their mobility impairments and other special needs.

4. **Sound Proof Windows** for Toomey Abbot Towers and select buildings of Pioneer Homes that are closest to the Viaduct and that will be impacted by noise and vibrations during construction. Section 6-4-6 of the DEIS states that total abatement of noise may not be possible per FHWA's Construction Noise Handbook (FHWA-HEP-06-015) and NYSDOT's Noise Analysis and Abatement Policy.
5. **Central Air Conditioning** for Toomey Abbot Towers to allow residents to keep their windows closed in an effort to minimize the noise and air quality issues during construction that involves the removal of asbestos and possible release of harmful substances into the air during the removal of the viaduct and other phases of construction.
6. **Noise and Vibration Mitigation**: The DEIS is not clear if NYSDOT considered the geological conditions of Toomey Abbot Tower, Pioneer Homes and the Syracuse Housing Authority's Main Administrative Office and its ability to withstand vibration and other effects of the construction.
7. **Purchase of SHA's Central Office** to allow SHA's main administrative staff to relocate during construction and to continue to operate and assist our residents without interruption during phase one and phase two of construction.
8. **Funds To Re – Connect The Street Grid** as outlined in the SHA Master Plan for redevelopment of the area in the footprint of the I-81 viaduct project in the same manner that Almond Street is going to be reconstructed and utilities are going to be relocated by the NYSDOT.
9. **Wilson Park**: Explanation of how after taking into consideration the construction of a new basketball court prior to the easement over the existing basketball court taking place that the remainder of Wilson Park, i.e. the community center and pool will still be safe for members of the community to use.

ⁱ As a major stakeholder and in the best interests of our residents, SHA strongly supports the community grid option for the NYSDOT I-81 Viaduct project. The community grid option best complements our resident's vision for the SHA's East Adams Neighborhood Master Plan. By reintegrating the city, the community grid option will be an affirmative step towards advancing the social, racial, and environmental justice initiatives necessary to enhance the impacted minority and low-income community. In conjunction with the City and County, SHA's Master Plan seeks to redesign our aging public housing and develop mixed income, mixed-used residential and commercial properties. To date, the SHA, through numerous meetings and official communications with NYSDOT assisted in the current community grid concept with the intention of establishing a vibrant commercial and residential corridor for this part of the urban core.

ⁱⁱ SHA controls 55 percent of the land immediately surrounding the I-81 viaduct that cuts through our Pioneer Homes neighborhood. By reintegrating the city, the community grid option will be an affirmative step towards advancing the social, racial and environmental justice initiatives necessary to enhance the impacted minority and



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low income community and also removes the effects of the prior discriminatory actions and lingering impacts from the original construction of I-81.

ⁱⁱⁱ Despite the analysis and conclusions stated in the DEIS by NYSDOT, SHA believes that due to the construction phase of the viaduct project lasting approximately 5 years and because both phases involve areas adjacent to SHA property or the taking of actual SHA property (SHA's building at 500 Renwick and the temporary easement on Wilson Park, the DEIS's assessment that most of the adverse impacts *on Syracuse's minority or low-income population, particularly SHA residents can be adequately mitigated is not accurate.*

^{iv} **Toomey Abbott Towers** is a 23 story high rise building located at 1207 Almond Street, that houses 308 units of elderly and disabled residents. Ninety Five (95) of the Three Hundred and Eight (308) units in Toomey Abbot Tower consist of a licensed Assisted Living Facility that is run by the ERIE program through Franciscan / St. Joseph's and is licensed under the Onondaga County Health Department.

Pioneer Homes is a neighborhood of 597 families. 144 of those families live on the East side of the I-81 viaduct in close proximity to I-81 and could potentially be landlocked during certain phases of construction. Tyler Court and Stewart Court to the West of the I-81 Viaduct are also immediately adjacent to the I-81 viaduct.

^v Section 4, "Construction Means and Methods" of the DEIS

Sincerely,

William Simmons
Executive Director



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