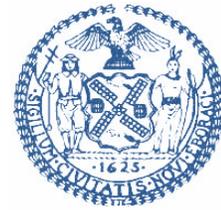


New York State Legislature
State Senator Brad Hoylman
Assembly Member Harvey Epstein



United States Congress
Congressmember Carolyn B. Maloney



City of New York
Borough President Mark Levine
City Council Member Keith Powers

April 11, 2022

Mayor Eric Adams
City Hall
New York, NY 10007

Dear Mayor Adams:

We write to you today regarding the proposed combined heat and power (CHP) plants within Stuyvesant Town, home to 25,000 residents. These proposed plants represent a serious concern to Stuyvesant Town and Peter Cooper Village residents in terms of degrading air quality that is already some of the worst in the city, exacerbating climate change, and setting a zoning precedent allowing for commercial use in residential spaces. As your new administration takes shape, we urge you to strictly scrutinize these proposed CHP plants and ultimately reject them in order to protect Stuyvesant Town's tenants and anyone living or working nearby.

For context, the ownership of Stuyvesant Town has proposed to build two CHP facilities, one at 251 Avenue C attached to residential buildings at 245 and 271 Avenue C, and a much larger one at 420 East 20th Street. During the past few years, Stuyvesant Town management has applied to various regulatory entities on the State and City level to seek approval to construct the two CHP plants, one of which has already been completed but is not operational. The CHP plants are built to burn natural gas, a fossil fuel and produce emissions harmful both to tenants living adjacent to the new smoke stacks as well as to the environment. The heat created by these plants would be used for Stuyvesant Town apartments, but the electricity generated would go back to Con Edison's grid in exchange for lower utility costs for the property owner.

As you can imagine, these proposed facilities have raised significant concerns for the thousands of constituents that live in the neighborhood and nearby. A summary of the residents' concerns is below:

Declining Air Quality

Tenants have serious concerns about the impact of these facilities on air quality in the surrounding community, which the City's data shows to be some of the worst. The eastern end of Stuyvesant Town is adjacent to Con Edison's massive 600 megawatt 14th Street power plant. The smoke stacks from that plant dwarf Stuyvesant Town and the surrounding buildings. As such, air quality has always been a concern for residents. The plans for these new CHP plants involve new smoke stacks constructed along the sides of residential buildings, right outside the apartments of tenants. We have heard from tenants, ranging from young families who have moved into Stuyvesant Town recently and hope to raise their children there, as well as long-term tenants who have called Stuyvesant Town their home for decades who are understandably concerned about vectors for more air pollution being built just outside of their windows.

Residents have been very actively protesting the CHPs: 900 signed an online petition; 1,500 signed postcards to the governor and commissioners of the DEC, DOB, and DEP; use social and digital media to update the community on the latest news; have held rallies; and have made presentations to community boards and to a special power plant committee convened by Congresswoman Carolyn Maloney.

Impact on Climate Change

Stuyvesant Town management has argued that these CHP plants will have a potential environmental benefit due to their use of newer technology, but they still represent a further investment in and an addition to our footprint in fossil fuels. New York City has been a leader in showing how cities can combat climate change, but this would be a step backwards. The carbon emissions produced by the CHP plants would be additive to the copious existing amounts of emissions generated around Stuyvesant Town.

Illegal Under Existing Zoning

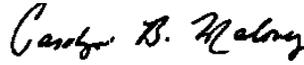
As we have argued in past correspondence, allowing Stuyvesant Town to construct these power plants within the residential complex would establish a harmful precedent ignoring the intent and text of the zoning resolution. The electricity produced by these CHP plants would not power the homes of Stuyvesant Town tenants, but would instead go back into the grid in exchange for a reduction of the property owner's utility bill. It is our belief that this is a commercial use that does not benefit the on-site tenants and should not be permissible on residentially zoned land. Allowing residential property owners to construct commercial facilities that do not fall under accessory use or benefit tenants could have dire consequences both for Stuyvesant Town and throughout the city.

For your review, we have attached prior correspondence and documents that speak to these arguments. As always, we thank you for your work on behalf of all New Yorkers, and we look forward to your latest updates on this matter, as well as any opportunity to meet with you and your administration directly.

Sincerely,



Keith Powers
Council Member



Carolyn Maloney
Congress Member



Brad Hoylman
State Senator



Harvey Epstein
Assembly Member



Mark Levine
Borough President

cc:

Chair Dan Garodnick, City Planning Commission
Commissioner Rohit Aggarwala, Department of Environmental Protection
Acting Commissioner Gus Sirakis, Department of Buildings
Executive Director Kizzy Charles-Guzman, Mayor's Office of Climate and Environmental Justice
Jessica Carrano, Director, City Legislative Affairs

Attachments:

- Letter from elected officials to Stuyvesant Town management 10/9/20
- Letter from elected officials to the Department of Buildings 1/19/21
- Response from the Department of Buildings to elected officials 4/20/21
- Letter from elected officials to the Department of Environmental Conservation 4/30/21
- Letter from elected officials to the Department of Buildings 6/16/21
- Response from the Department of Buildings to elected officials 7/21/21
- Letter from elected officials to the Department of Buildings 11/4/21
- Response from the Department of Buildings to elected officials 1/12/22
- Report from George M. Janes & Associates on behalf of the Stuyvesant Town-Peter Cooper Village Tenants Association 11/23/21
- Letter from elected officials to the Department of Environmental Conservation 2/18/22
- Response from the Department of Environmental Conservation 3/25/22