

Dear Hudson Planning Board,

CC: Mayor Johnson, Director Tullo, Council President DePietro, Councilmember Volo, Council Member Belton, Chairperson Kenneally, CEO Haigh

I am writing regarding the Mill Street affordable housing project. This is a City of Hudson initiated project. However, the City's partner Kearney Real Estate and Development Group is the only party that appears at your meetings. I think that it would be responsible for City of Hudson representatives, who are proponents for this project, to answer some questions about issues that go beyond the borders of the lot.

I wonder why this proposed design covers so much of the site footprint. I believe that the answer lies in the funding. The concept called for 100 scattered housing units within the City. Hudson bundled three properties in their affordable housing plan/application, Rossman Ave, State and Fourth St., and the Mill Street parcel. The effort would require Mill Street to fit 70 units on this site. This is a backward means of determining what to build on a lot.

The current design cuts into the hillside, placing portions of each building below grade. This is not an insignificant detail. The retaining walls required to accomplish this would be tall, expensive and susceptible to water infiltration. I have seen floor plans which seem to represent higher floors above the retaining walls, not the subgrade floors. Windows are shown in areas that would be underground on lower floors. Requirements for natural light, ventilation and emergency egress will be harder to achieve if living floors are on the same level as retaining walls.

You have discussed the flood plain on and adjacent to this parcel, and it seems understood that the field will be filled in to raise the grade above the flood plain level. The developer appears to have chosen to cut soil from the hillside and use it to help fill the low parts of the field. The sitework for this project will be intensive. Retaining walls appear to be quite tall, and will need to be over-excavated to install waterproofing and drainage. Many more trees will need to be cut down than are implied on the renderings.

Many of the concerns about this project are just beyond the property lines. The flood plain should be shown on project plans. The Planning Board is familiar with Hudson River flooding from their review of the Colarusso Haul Road. The City is familiar with flooding from a recent study done by Scenic Hudson of rising water levels at Henry Hudson Riverfront Park. The reports predict 2 ½ feet of rise in water levels by 2050. This will affect the project site. The intersection of 2nd and Mill Streets is approximately 8 feet above sea level. In 2024, the Mill Street neighborhood was flooded to approximately 10 feet above sea level. These numbers correlate to the analysis of the Haul Road and the rising sea level study at the waterfront park. Kearney stated that they will drain their site well but not improve the situation west of the property, as the size of the drainage pipes downstream at the intersection were smaller than those they would install onsite. This is a concern that the City should resolve. Regardless of drainage, when large regional rain combines with high tide Mill Street is still likely to flood. This issue will get worse over time as shown in the Scenic Hudson report.

I also heard during your last meeting discussions of connecting Mill Street with Third Street. Whether this is a pedestrian stair or a full paved road, this is also probably beyond the

scope of the developer. The City should present a solution to the Planning Board should this project move forward.

Bus service planned for Mill Street should be solidified with the agency providing the buses. It should be a part of your records on the project. The project plans include a “hammerhead” turn around for fire trucks. This is a common solution as it is used infrequently only during emergency situations. If this same hammerhead is proposed to be used by community and school buses they must perform K-Turns in the middle of the Empire State Trail adjacent to Charles Williams Park multiple times a day.

I ask that the Planning Board give this project the same review process of any other brought before them. We can accomplish affordable housing goals without ignoring so many issues. The City has chosen to ask you to consider the height variance for this project rather than the Zoning Board of Appeals. Variances are used to bypass defined zoning codes. Zoning codes are used to define and unify neighborhoods and are only bypassed in unique circumstances that have little impact. The responsibility was taken from the ZBA, because it was anticipated that the variance would not pass.

In the 2025 State of the State address, Governor Hochul asked that cities develop 50 affordable housing units in the next three years. Between Mill Street, State Street, Rossman Avenue and redevelopment by the HHA (Bliss Towers) Hudson is taking on a larger burden for affordable housing (possibly 200 units) than the Governor is asking. Developers don’t need to be allowed to maximize construction on every site. There are economic and political forces pushing for a larger development than fits in this neighborhood.

In summary, I would rather see right-sized development on this site that keeps Hudson residents in mind. I ask the Planning Board to:

- Deny a height variance
- Not allow construction until after Charles Williams Park is complete.
- Reconcile the plans with Scenic Hudson reports on flooding and sea level rise
- Include sidewalks from 2nd Street to Charles Williams Park
- Include open space better than a dead-end path behind the building
- Confirm in writing bus routes with Columbia County and HCSD
- Review emergency egress routes from both buildings
- Review floorplans of subgrade floors

I ask the City of Hudson to:

- Improve the existing flood situation at intersection of 2nd and Mill Streets
- Connect Mill Street to 3rd Street

- Consider financial impact to the City of Hudson and Hudson City School District for services provided to what is assumed to be a tax-free parcel

Jason Foster