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Congress of the United States
House of Representatives
Washington, DC 20515 -2501

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The Honorable Julian Castro
Secretary
U.S. Department of Housing and Urban Development
451 Seventh Street, SW
Washington, DC 20410

Re: Near North Side STL Choice Neighborhood / City of St. Louis Homeless Shelter

Dear Secretary Castro,

As you know, I am the Congressman for Missouri's First Congressional District which encompasses all of the City of St. Louis, the urban core of the St. Louis region. I am writing about a matter involving a plan by the City of St. Louis to open a large facility for the homeless in a section of my District that is already overburdened by concentrated poverty as well as multiple facilities that serve the homeless and recently released felons.

History

My District includes a section of the City of St. Louis called the Near Northside, which is just north of Downtown St. Louis. For the last 60 or 70 years, the City of St. Louis has engaged in policies that have been designed to or had the effect of creating a huge concentration of African American poverty in a dense ghetto north of the affluent central corridor of the City of St. Louis. These efforts intensified with the construction of the infamous Pruitt Igoe housing project in the 1950's and have continued without ceasing through today, greatly undermining the lives and prospects of many of my constituents.

Not only is the Near Northside the home to thousands of densely-packed low income apartment units, but the City of St. Louis has caused or allowed many facilities that serve the most disadvantaged homeless individuals to locate inside or just outside the Near Northside – there is no other concentration of homeless service providers with anywhere close to this density anywhere else in the St. Louis region.

Moreover, in the early 2000's, the State of Missouri built a mammoth facility to serve Class III (the most troubled) felons who were exiting confinement within the Missouri Department of



Corrections system. The City of St. Louis focused the State's effort to build this 550 bed facility on the eastern boundary of the Near Northside. Today, hundreds of largely unreformed ex-prisoners (with an 87% recidivism rate) exit this 550 bed facility every day, being released directly into the Near Northside area. This prison release center, the only one that exists statewide, houses ex-prisoners from all over the state and currently houses upwards of 130 sex offenders at any one time. A recent local news story highlighted this troubling situation: (<http://www.kmov.com/story/31963269/rehabilitating-or-enabling-release-center-worries-residents-city-leaders>).

Recently, some of my constituents became aware of a plan by the City of St. Louis to locate a new, very large facility for the homeless in the middle of this area. This facility would replace a large overnight shelter and a large day shelter that are being evicted from Downtown St. Louis under great political pressure from Downtown stakeholders who are largely affluent, mostly white neighbors. Moreover, the City decided to use this new facility as a centralized front door into the homeless service system for all homeless men in the St. Louis region, adding a large intake and assessment function to the overnight and day shelter uses.

In response to the City's plan for this facility, to be named Biddle House, many of my constituents, including Alderwoman Tammika Hubbard, the representative for the area where Biddle House was proposed to be located, organized to strenuously object to Biddle House. Their objections were not rooted in *NIMBY*ism, as their neighborhood already disproportionately houses facilities and housing serving the poor. Their objections were based upon the continued concentration and saturation of facilities serving the poor in an already devastated and overburdened community that was just starting to pull itself up with some assistance from the federal government.

In response to the community objections, the City of St. Louis promised to bring the Biddle House plan to the Near Northside community and take substantive input as to the facility. That never happened. Instead, in January of this year, the City informed Alderwoman Hubbard that Biddle House was moving forward over her objections and without any input from her or her constituents.

On April 5, 2016, the Carr Square Tenant Corporation, which represents a public housing complex adjacent to Biddle House, sent the attached letter to the Board of Alderman of the City of St. Louis asking for help in stopping Biddle House from opening in the Near Northside.

Last week, I received a call from Francis Slay, Mayor of the City of St. Louis. Mayor Slay asked that I support the opening of Biddle House as planned by the City. I indicated that I had significant concerns and needed to engage in some fact finding before I could offer a response.

Initial Concerns

While I am still gathering information in order to formulate a position on this matter, I have some strong initial concerns about the Biddle House plan and the concerns are certainly amplified by the following facts and allegations:

- The attached letter alleges that several white aldermen on the south side of the City were asked to allow Biddle House to open in their wards and were allowed to veto the project; the same courtesy was not extended to an African American Alderwoman representing a poor, minority community with an existing density of such facilities.
- The continued efforts by the City of St. Louis to concentrate housing and services for the poor in one of the St. Louis region's most devastated minority areas seems like poor policy driven by local political considerations rather than what is best for our homeless and poorest citizens.
- Biddle House would replace two facilities being ejected from the affluent Downtown area because of the perceived negative image those facilities cause to that resource rich and privileged area.
- Given the established best practice models for ending homelessness, I have to question the City's decision to incorporate a large men's overnight shelter, a large day shelter and meal operation, and a centralized front door for homeless men into a single, enormous facility, regardless of location.
- My initial investigation suggests that a centralized front door for homeless men is bad policy that is not supported by your Department and does not comply with the City of St. Louis' own 2012 update to its 2005 Plan for Ending Chronic Homelessness.
- My initial investigation also suggests that there is little regional participation in solutions to homelessness in St. Louis, and that most of the burden for the regional problem of homelessness falls upon the City and in particular the Near Northside neighborhood in the First Congressional District.

Questions Needing Answers

Some concerned constituents believe a recent 2015 Supreme Court decision; *Texas Department of Housing and Community Affairs v. Inclusive Communities*, may be instructive in this matter as the Court found the FHA protects disinvested communities with high levels of racial segregation from over-concentrations of housing for those in poverty if there are disparate impacts on racial minorities. My enumerated concerns compounded with Supreme Court's *Texas* decision lead me to seek specific answers and guidance to formulate a response to Mayor Slay, to address the concerns of my constituents, and to also ensure federal housing best practices are followed in my district. I am hoping you and your staff can assist me in obtaining answers to the below questions:

- What is HUD/federal policy concerning the continued increase in the density of housing for the poor and services for huge numbers of the homeless / recently released felons in a high poverty, minority neighborhood?

- What is HUD/federal policy concerning the advisability of concentrating large overnight shelter, day shelter and intake and assessment functions for men into the same building, irrespective of the location?
- What is HUD/federal policy concerning the use of a single, centralized front door for intake and assessment for all homeless men in a sprawling 3million person region like St. Louis?
- Is the plan for Biddle House compliant with the federal Housing First model as adopted by the City of St. Louis in 2005?
- What would the opening of the Biddle House facility do to the likelihood of the Near Northside Choice Neighborhoods Area receiving additional funding for implementation of the plan created pursuant to the awarded planning grant?
- Is it HUD/federal policy best practices to burden a 300,000-person municipality like the City of St. Louis with almost all of the responsibility for and externalities associated with homeless services for a 3-million-person region, particularly related to homeless men? If not, what can be done to cause change in the St. Louis region to move the community closer to best practices?
- Will HUD allow federal funding it awards the City of St. Louis to be used to construct or operate Biddle House as proposed?
- Will the execution of this policy by the City of St. Louis violate Fair Housing laws?
- Are there any other issue areas to be addressed in consideration of these policy decisions?

I look forward to receiving your thoughts on the information and issues in general and also to the specific questions I have submitted.

Sincerely,



Wm. Lacy Clay
Member of Congress