

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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Index No.: _____

COUNCILMEMBER CHRISTOPHER MARTE,
MARIA SALAS, SHEILA HART, FU MAN CHANG,
YUET SIU LEE, WENDALINE PEREZ, MARGARET MOY,
BARBARA JETER, PEARL RUSSELL, BARBARA KEMPE,
and AIDA RUIZ,

Plaintiffs,

-against-

CITY OF NEW YORK, CHERRY STREET OWNER LLC,
TWO BRIDGES SENIOR APARTMENTS, L.P.,
TWO BRIDGES ASSOCIATES, L.P., and LE1 SUB LLC,

Defendants,

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VERIFICATION

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

CONOR ALLERTON, being duly sworn, deposes and says:

1. Deponent has read the foregoing VERIFIED COMPLAINT and knows the contents thereof; and the same is true to deponent's own knowledge, except as to the matters therein stated to be alleged upon information and belief and as to those matters, deponent believes them to be true.

2. I am currently employed as a legislative aide to Councilmember Christopher Marte representing Councilmanic District #1, which includes the Lower East Side of Manhattan. I have been employed by Councilmember Marte for six months.

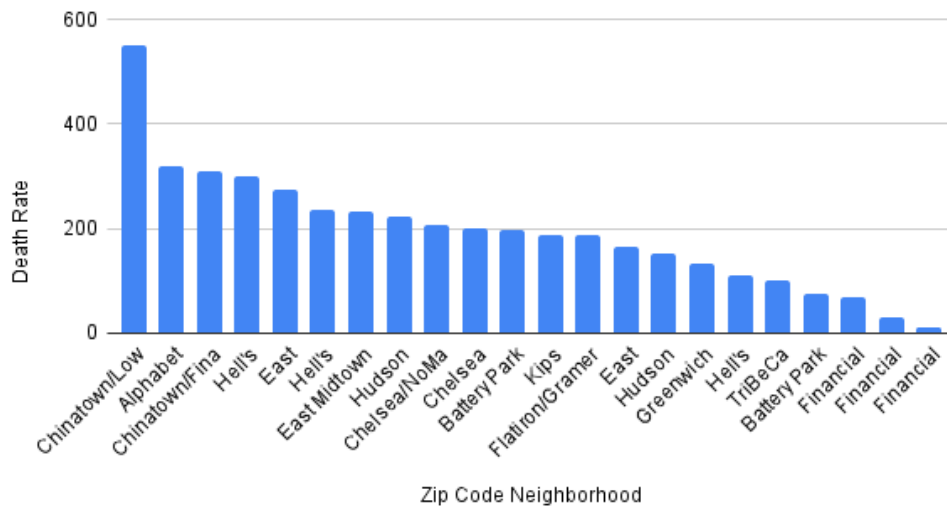
3. My professional and educational background is as follows: I graduated from Vassar College in 2018 with a bachelor's degree in Urban Studies, and from Columbia University in 2020 with a master's degree in Urban Planning. From May 2020 to October 2021 I worked as an Urban Planner for the Manhattan Borough President's Office. In October 2021 I was hired onto the City Council campaign of Christopher Marte, and in January 2022 I was hired as Director of Land Use for Council Member Christopher Marte.

4. My duties on behalf of Councilmember Marte's constituents and the citizens of the City of New York include the following tasks: As Director of Land Use, I have responsibilities including conducting land use and housing policy research, drafting legislative proposals, tracking real estate development and land use projects in the district, drafting letters and testimony on behalf of the office, overseeing our role in the Uniform Land Use Review Procedure, stewarding land use projects led by our office, handling land use-related constituent cases, and coordinating with various City agencies and community stakeholders.

5. I have analyzed and reviewed the following documents, articles, and materials annexed hereto as Exhibit "A." Based upon the conclusions set forth in the research material annexed hereto, the following statement summarizes the scholarly research.

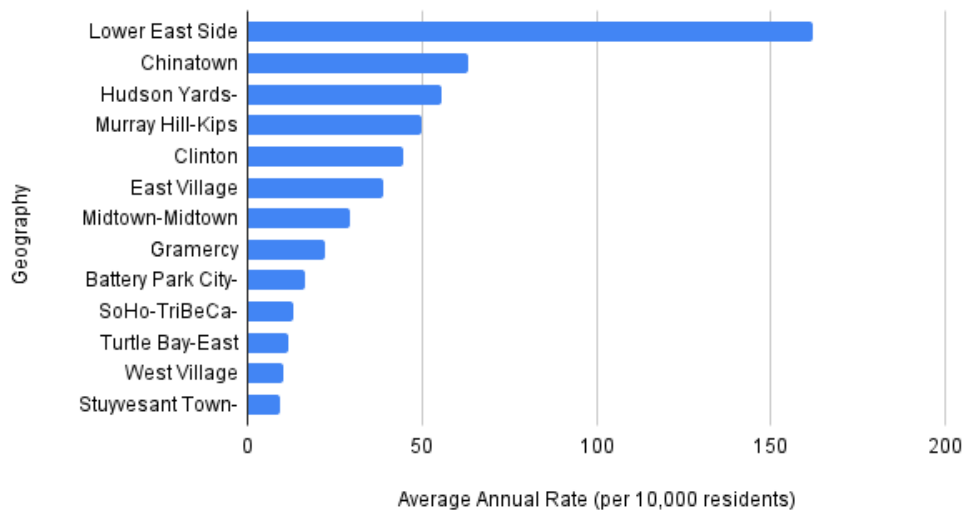
6. In low-income neighborhoods like the Lower East Side, residents are disproportionately impacted by asthma. Respiratory diseases like asthma and lung cancer for residents in Lower East Side and Chinatown had already dramatically increased after the September 11, 2001 attacks due to dust, gas, and fumes exposure. In recent years, the rates of visits to the emergency room in the Lower East Side due to asthma for children and adults have more than doubled that of other neighborhoods in lower Manhattan. High levels of poverty and substandard housing are also linked to more severe asthma rates.

COVID Death Rate per Zip Code (March 2020 to June 2022)



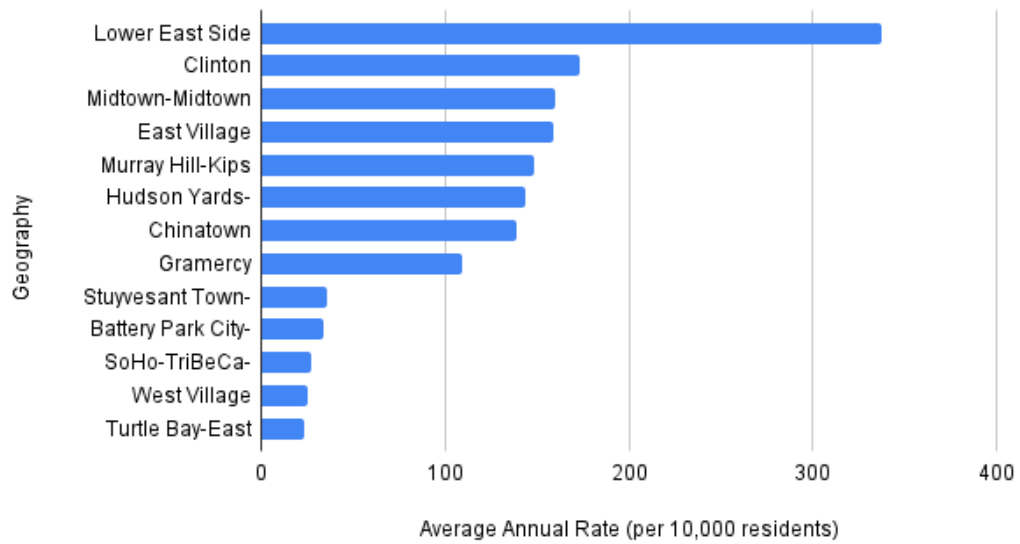
- Source: NYC Department of Health and Mental Hygiene
- Retrieved from the NYC Department of Health and Mental Hygiene website in June 2022
- Inputted and visualized in Google Sheets

Average Annual Rate of Asthma ER Visits (Adults) (2017-2019)



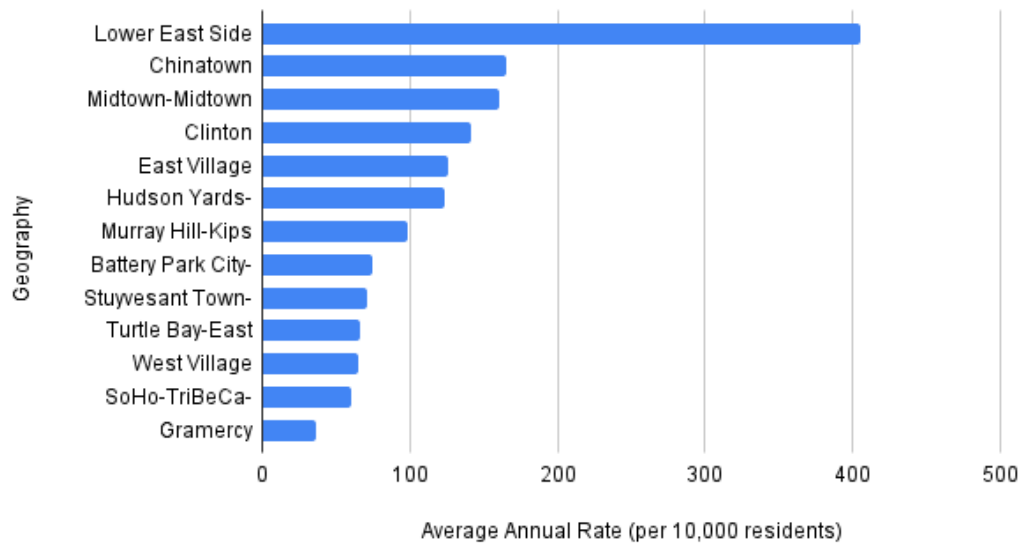
- Source: NYC Department of Health and Mental Hygiene
- Retrieved from the NYC Department of Health and Mental Hygiene's Environment & Health Data Portal in June 2022
- Inputted and visualized in Google Sheets

Average Annual Rate of Asthma ER Visits (Children Ages 0-4) (2017-2019)



- Source: NYC Department of Health and Mental Hygiene
- Retrieved from the NYC Department of Health and Mental Hygiene's Environment & Health Data Portal in June 2022
- Inputted and visualized in Google Sheets

Average Annual Rate of Asthma ER Visits (Children Ages 0-4) (2017-2019)



- Source: NYC Department of Health and Mental Hygiene
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