



B. Letters and Written Comments Received on the DEIS



HARRISON POLICE DEPARTMENT



650 North Street
Harrison, New York 10528
Phone: (914) 967-0739 ~ Fax: (914) 813-7428
Email: amarraccini@harrison-ny.gov

ANTHONY MARRACCINI
Chief of Police

May 11, 2015

Steve Martini
VHB
Community Planner
50 Main Street
Suite 360
White Plains, New York 10606

Dear Mr. Martini:

Regarding your letter dated April 8, 2015, Reference Number 29254.00, Residences at Corporate Park Drive, Draft Environmental Impact Statement (DEIS).

The following is in response to your request for the existing conditions and potential impacts of the proposed project on police service in the area.

Existing Conditions:

(1) Responsibilities of the Harrison Police Department:

The Harrison Police Department is responsible for the Protection of Life and Property, Safety and Security of the Residents and Businesses in the Town/Village of Harrison. Combat Crime by both preventing it and aggressively pursuing violators of the law. Maintain a higher standard of integrity than is generally expected of others because so much is expected of us. Value human life, respect the dignity of each individual and render our services with courtesy and civility. Some of our functions include Community Policing, Traffic Safety and Enforcement, School Resource Officers, Crime Prevention, Criminal Investigations and Apprehensions, Community Outreach Programs, Senior Welfare Checks, and Bicycle Safety. The Harrison Police Department is an active and progressive police agency devoting our services to improving the quality of life in the Town of Harrison.



(2) The Harrison Police Department is a Sixty Six Member Department, with a Patrol Division, Traffic Division and Detective Division. Due to economic constraints our department has had to cut significant programs and law enforcement efforts, which at one time were a significant benefit to our community. Prior to budgetary constraints our police department supported Seventy Nine Sworn Officers, a Youth Division, a Narcotics Enforcement Division, a Computer Crimes Unit, a robust Community Policing Unit and Traffic and Commercial Vehicle Enforcement Officers. The restoration of these services is a necessary and mandatory goal in providing a safe community. Restoration of these services should be in place prior to any additional burden on police services.

(3) Department Equipment includes Police Vehicles, Emergency Mobile Command Center, Traffic Division Motorcycle Unit, Tactical Vehicles, Emergency and Medical Equipment for First Responders, Investigative and Crime Scene Processing Equipment and Parking Enforcement.

(4) The Police Department is located centrally within the Town of Harrison at 650 North Street, Harrison, New York.

(5) The average response time to 103-105 Corporate Park would be three to seven minutes based on an emergency or non-emergency call. Response time could increase based on officer availability and the nature of the call for service.

Potential Impacts:

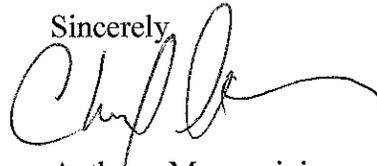
(1) Increased demand for police services due to an increase in population from the number of residents that would potentially reside at 103-105 Corporate Park would require this department to increase our police and staffing. The impact on the Police Department due to the restaurant proposed on-site would be determined by the restaurant size, hours and number of patrons. The impact on traffic in the area could be problematic as we would estimate another eight hundred and forty two Vehicles (based on an average of 2 vehicles per household, from the 2009 Survey by the National Highway Transportation Safety Board) and this does not include the vehicles from restaurant staff and patrons. Residential developments will require a variety of police services including and not limited to: Ambulance/Aided Case Calls, Domestic Disputes, Larcenies, Identity Theft Complaints, and Criminal Mischief as well as create a potential opportunity for more serious criminal activity. Additionally this site will be transformed from a commercial area, which required most of its police services Monday – Friday from 7:00AM – 6:00PM. We are now looking at a development which would require police services Seven Days a Week, Twenty-Four Hours a Day. In order to comment on the traffic impact and the restaurant, more information will be needed.

(2) The 421 residential units being proposed would require us re-evaluating our patrol sector coverage areas, which would most likely increase our manpower requirements.

(3) Adequacy of access to site and site components appear to be adequate, however I would suggest that the existing emergency access lane be widened for larger emergency vehicles such as Fire Trucks and Ambulances and we would also like to evaluate additional access points.

Should you have any additional questions please do not hesitate to contact me at 914-967-0739.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anthony Marraccini', with a long, sweeping horizontal flourish extending to the right.

Anthony Marraccini
Chief of Police

HARRISON ENGINEERING DEPARTMENT

Town/Village of Harrison
Alfred F. Sulla, Jr. Municipal Building
1 Heineman Place
Harrison, New York 10528

Michael J. Amodeo, P.E., CFM
Town Engineer



To: Thomas Heaslip, Chariman and Members of the Planning Board

From: Michael J. Amodeo, P.E., CFM, Town Engineer



Date: May 19, 2015

Re: 103-105 Corporate Park Drive

I have completed a review of the documents submitted in advance of the May 19, 2015 Planning Board Meeting and offer the following comments:

1. It is the understanding of this office that neither the sanitary sewer main that originates on Corporate Park Drive nor the streetlights were ever dedicated to the town of Harrison
2. A full study of the existing conditions and capacity of the sanitary sewer main is required to understand if it can accept the proposed flows.
3. Any needed upgrades to the sanitary sewer main and street lighting system should be explored at this time to ensure adequate conditions

MJA/fmb



Robert P. Astorino
County Executive

County Planning Board

June 9, 2015

Rosemarie Cusumano, Secretary
Town/Village of Harrison Planning Board
1 Heineman Place
Harrison, NY 10528

Subject: **Referral File No. HAR 15-001C — The Residences at Corporate Park Drive
Zoning Text Amendment, Amended Site Plan &
Amended Special Exception Use Approvals
Draft Environmental Impact Statement**

Dear Ms. Cusumano:

The Westchester County Planning Board has received a draft environmental impact statement (EIS) (dated accepted May 19, 2015) prepared pursuant to the NYS Environmental Quality Review Act (SEQR) for the above referenced proposal.

The development proposal calls for the demolition of an existing, mostly vacant, office building complex located at 103-105 Corporate Park Drive and its replacement with a new 421-unit apartment building (containing 17 studio, 214 one-bedroom and 190 two-bedroom units) with 753 parking spaces, 10,000 square feet of recreation space and 5,000 square feet of retail or restaurant space.

The applicants are petitioning the Town/Village to amend the Zoning Ordinance to add two new sections (X and Y) under the regulations for the SB-O Zoning District. Section X: SB-O Multi-Family Residential would contain regulations to permit and regulate multi-family dwellings in this district. Section Y: SB-O Retail Use, Retail Service Use, Restaurant Use would contain regulations to permit and regulate these types of commercial uses in this district. Because both types of uses would require special exception use permit approval from the Town/Village Board as well as site plan approval from the Harrison Planning Board, the applicant intends to apply for those approvals if the zoning amendment is approved.

The materials state that the proposed apartment building is intended for occupancy by either young professionals with no children or “empty-nesters.” The proposed zoning text amendments seek to codify this intention by requiring the design of the project to be “primarily geared” towards these demographics. The proposed zoning text notes that the purpose for this design is to avoid creating additional demands on the Harrison School District.

We have reviewed the draft EIS under the provisions of Section 239 L, M and N of the General Municipal Law and Section 277.61 of the County Administrative Code and we offer the following comments:

1. Affordable affirmatively furthering fair housing (AFFH). The draft EIS contains no discussion as to whether any of the proposed units will be set aside as affordable affirmatively furthering fair housing (AFFH) units. We continue to recommend that the Town/Village take steps to incorporate the County’s Model Ordinance Provisions for AFFH into the Town/Village Code. We recommend that the final EIS include a discussion on how the proposed development could potentially affirmatively further fair housing.

2. Consistency with County Planning Board policies. The proposed development is generally consistent with the County Planning Board's long-range planning policies set forth in *Westchester 2025—Context for County and Municipal Planning and Policies to Guide County Planning*, adopted by the Board on May 6, 2008, amended January 5, 2010, and its recommended strategies set forth in *Patterns for Westchester: The Land and the People*, adopted December 5, 1995 because it will continue to meet the increased demand for the "Live, Work, Play" model of development that will help capitalize on many of Westchester's strengths: a skilled and talented workforce, an available and highly competitive real estate market, diversity, access to transportation corridors and quality of life. While this proposed development is not located within an existing downtown center, we observe that it will be part of changes that will enhance one of the county's major corridors through the redevelopment of a section of the Platinum Mile into an attractive mini-center.

We are pleased to note that the EIS describes that applicant as contemplating "improved access to adjoining properties for pedestrians and cyclists" (and covered bicycle parking) as a part of the proposal. We strongly support this approach because the combination of dead-end cul-de-sacs, lack of cross connections between cul-de-sacs and the one-way traffic pattern of Westchester Avenue is an arrangement that may hinder the successful mixing of uses and the economic foundation of redevelopment. We encourage the Town/Village to give consideration to both vehicular and non-motorized connections in a broader context, beyond the subject site and its adjoining properties, by exploring potential connections throughout the "Platinum Mile" quadrant. Connections could also make the provision of transit service more efficient and rider friendly.

3. Sewage flows. The draft EIS states that the proposed development will add 67,530 gallons per day to the sewage flow volume requiring treatment at the Mamaroneck Wastewater Treatment Plant operated by Westchester County. We note that the draft EIS contains an adequate discussion of I&I mitigation to offset this increase.

4. Recycling. Section III.J.5 *Solid Waste* notes that "the project would participate in the Town and County recycling programs." We recommend that the final EIS include a discussion of how recyclables will be sorted and stored on site in compliance with the expanded County recycling program which now includes plastics numbered 1 through 7.

Thank you for the opportunity to comment on this matter.

Respectfully,
WESTCHESTER COUNTY PLANNING BOARD

For:
By:



Edward Buroughs, AICP
Commissioner



June 17, 2015

Honorable Chairman Thomas Heaslip and
Members of the Planning Board
Town of Harrison
One Heineman Place
Harrison, New York 10528

Re: Proposed Young Professional/Empty Nester Building
103-105 Corporate Park Drive, Harrison, New York

Dear Chairman Heaslip and Members of the Planning Board:

I am writing in support of the proposed young professional/empty nester apartment building at 103-105 Corporate Park Drive that is currently being considered by the Planning Board. The proposed development has the potential to turn approximately 148,000 square feet of obsolete and mostly empty office space into a live/work/play community that can revitalize the "Platinum Mile".

I am the President of a commercial real estate brokerage firm located in Westchester, and am very familiar with the issues associated with development in the area. The proposed development would be attractive to the surrounding corporate parks because it would provide housing within walking or shuttle distance for employees. This will make the Platinum Mile a more enticing neighborhood for both prospective businesses and young professionals.

I therefore encourage the Board to grant the necessary approvals for this project as soon as possible, so as to further revitalize the Platinum Mile.

Please include this letter in the public record on the Draft Environmental Impact Statement regarding this project. Thank you for your consideration.

Very truly yours,

A handwritten signature in black ink that reads "Howard E. Greenberg".

Howard E. Greenberg, SIOR
President, Howard Properties, Ltd.

CC: Mayor Ron Belmont
Town/Village Board of Harrison
Patrick Cleary, AICP, PP

Tenant Representation and Corporate Services

RH Consulting

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Received 6/23/15

Richard Hyman, AICP

June 17, 2015

TO: Harrison Planning Board
FROM: Richard Hyman, AICP
Westchester Workforce Housing Coalition
RE: The Residences at Corporate Park Drive

Zoning for housing in office parks is a great idea; in fact it is an idea a few of us had several years ago. The County in 2007 commissioned me to study the idea and the result was a Report "Office Park Housing". This Report, in addition to recommending mixed use zoning in office parks allowing multi-family housing and commercial uses, also recommended that such zoning require fair and affordable housing. After reviewing several pro formas of existing affordable developments, the Report recommends that 15% of the multi-family units constructed be affordable.

The County Planning Board, in a letter dated April 27, 2015 on this matter, wrote "...we continue to recommend that the Town/Village take steps to incorporate the Model Ordinance Provisions into the Town /Village Code, we recommend the draft EIS to include a discussion on how the proposed development could potentially affirmatively further fair housing in Harrison." The Model Ordinance includes a required set-aside of 10% of the units as fair and affordable. Unfortunately, the Town/Village has not required nor has the developer provided even any discussion of fair and affordable housing in the DEIS. The only sentence on the subject in the DEIS is "(t)he Town of Harrison does not have a requirement for affordable housing and there is none proposed here (all units are proposed to be market rentals)."

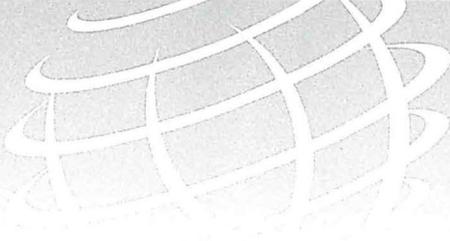
In addition to ignoring the County's recommendation, the DEIS quotes and then also ignores the recently adopted Harrison Comprehensive Plan which states "Harrison should evaluate the

possibility of allowing more varied housing types to increase variety and affordability of housing.” To respond to this recommendation of the Comprehensive Plan, as the DEIS does that “rental apartments would help expand the housing options available within the Town” is actually non-responsive and disingenuous. SEQRA case law requires the DEIS to include the study of socio-economic factors of which affordable housing is one. If Harrison were to accept this DEIS with no discussion of fair and affordable housing, it could easily be accused of not taking a hard look and be subject to litigation.

All of this takes place in the context of Harrison’s dismal history relating to fair and affordable housing. The Westchester County Housing Allocation Plan for the 2000-2015 period for Harrison is 756 units. None have been built in Harrison. The two Allocation Plans have been utilized by the County for over 20 years and recognized and given standing by the Courts in *Triglia v. the Town of Cortlandt*. In addition, the Housing Monitor under the 2009 Settlement of the law suit against Westchester County has determined that Harrison is one of three municipalities in the County with the most exclusionary zoning based on both the Berenson and Huntington tests.

Ironically, in the face of all this history, Harrison has a unique opportunity to adopt zoning requiring fair and affordable housing on this site and has a developer with a history of providing affordable units in many of its developments. In Dutchess County, Toll Brothers is providing affordable housing at Hopewell Glen (29 of 292 units) and Four Corners (26 of 264 units).

The proposed development before this Board-- The Residences at Corporate Park Drive -- is not currently permitted under local zoning. Therefore, Harrison has the ability even obligation to require the inclusion of fair and affordable housing as a condition for rezoning the property.



MARISSA BRETT
President

ACCESS.
ADVOCACY.
Westchester County Association
ACTION.

June 18, 2015

Honorable Chairman Thomas Heaslip and
Members of the Planning Board
Town/Village of Harrison
One Heineman Place
Harrison, New York 10528

Re: Proposed Young Professional/Empty Nester Building
103-105 Corporate Park Drive, Harrison, New York

Dear Chairman Heaslip and Members of the Planning Board:

I am writing on behalf of the Westchester County Association, a business membership organization in Westchester, in regards to the proposed multi-family dwelling at 103-105 Corporate Park Drive that is currently being considered by the Planning Board. Our organization's mission is to drive economic vitality and development in Westchester and the region, stimulate new business creation and provide a strong and clear voice for the interests of businesses of all sizes. We have a significant interest in the development of the properties along the I-287 corridor, also known as the Platinum Mile, as part of our mission and focus on economic development through our Blueprint for Westchester initiative.

The Westchester County Association supports the proposal from Normandy Real Estate Partners, LLC, in collaboration with Toll Brothers, to demolish the current dilapidated, essentially vacant buildings on the 103-105 Corporate Park Drive property, and construct a much-needed young professional/empty nester multi-family residential building with a parking garage, restaurant and other amenities. Such housing is desperately needed in the Town/Village of Harrison for the employees of the surrounding office buildings, as well as Fordham University, Life Time Athletic and Sloan Kettering. This housing is also attractive to the empty nesters who wish to sell their homes but remain in Harrison.

The proposed use will replace the existing office buildings on the Property, and will help revive the entire I-287 Corridor, by providing suitable, complementary non-office development, which will replace underutilized buildings, and help preserve the tax base created by surrounding office uses, without burdening the school system or existing infrastructure. We urge this Board, and the Town/Village Board, to grant the necessary approvals for this project as soon as possible, so construction may begin on this important project.

Please include this letter in the public record on the Draft Environmental Impact Statement regarding this project. Thank you for your consideration.

Very truly yours,

A handwritten signature in blue ink that reads "Marissa Brett". The signature is written in a cursive style with a large initial "M".

CC: Mayor Ron Belmont
Town/Village Board of Harrison
Patrick Cleary, AICP, PP



800 Westchester Avenue
Suite S-310
Rye Brook, NY 10573
p: 914.948.2110
f: 914.948.0122

June 18, 2015

Honorable Chairman Thomas Heaslip and
and Members of the Planning Board
Town/Village of Harrison
One Heineman Place
Harrison, New York 10528

Re: Proposed Young Professional/Empty Nester Building
103-105 Corporate Park Drive, Harrison, New York

Dear Chairman Heaslip and Members of the Planning Board:

I am writing on behalf of the Business Council of Westchester, an organization whose mission is to foster the business climate in Westchester and provide more opportunities for local businesses. The Business Council wishes to support the proposed multi-family dwelling at 103-105 Corporate Park Drive that is currently being considered by the Planning Board.

We believe that Harrison and Westchester County would be greatly served by the revitalization of the properties along the I-287 corridor, also known as the Platinum Mile. The Business Council supports the proposal from Normandy Real Estate Partners, LLC, in collaboration with Toll Brothers, to demolish the dilapidated and largely empty buildings on the 103-105 Corporate Park Drive property, and construct a multi-family residential building with a parking garage, restaurant and other amenities. This proposal will attract young professionals to the area and provide much-needed housing for the surrounding office buildings, as well as Fordham University, Life Time Athletic and Sloan Kettering. The proposed development will also be attractive to empty nesters who wish to sell their homes but remain in Harrison.

The proposed use will help revive the entire I-287 Corridor by providing suitable, complementary non-office development, which will replace underutilized buildings, and help preserve the tax base created by surrounding office uses, without burdening the school system or existing infrastructure. We urge this Board, and the Town/Village Board, to grant the necessary approvals for this project as soon as possible, so construction may begin on this important project.

The members of the Business Council of Westchester wholeheartedly support the proposal to construct a multi-family residential building in the I-287 Corridor that will provide much-needed housing for young professionals and empty nesters, and will help to foster business growth in the Town/Village of Harrison and the County of Westchester.

Please include this letter in the public record on the Draft Environmental Impact Statement regarding this project. Thank you for your consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read "Marsha Gordon". The signature is fluid and cursive, with a prominent initial "M".

Dr. Marsha Gordon
President/CEO, Business Council of Westchester

CC: Mayor Ron Belmont
Town/Village Board of Harrison
Patrick Cleary, AICP, PP

June 18, 2015



Honorable Chairman Thomas Heaslip and
and Members of the Planning Board
Town of Harrison
One Heineman Place
Harrison, New York 10528

Re: Proposed Young Professional/Empty Nester Building
103-105 Corporate Park Drive, Harrison, New York

Dear Chairman Heaslip and Members of the Planning Board:

I am writing on behalf of Life Time Fitness, Inc., the owner and operator of the fitness center at One Gannett Drive, Harrison, New York. Life Time Fitness is proud to be a part of the rebirth of the "Platinum Mile" neighborhood and supports the proposed multi-family dwelling at 103-105 Corporate Park Drive that is currently being considered by the Planning Board.

Specifically, we believe that providing much needed multi-family housing will attract young professionals as well as empty-nesters, and will help to strengthen the "teardrop" area of the Platinum Mile. We believe that providing a greater mix of complimentary uses, such multi-family housing, will better ensure the long-term sustainability of the community, and will support the existing businesses within the Platinum Mile by providing close proximity housing that will attract young professionals.

We therefore encourage the Board to grant the necessary approvals for this project as soon as possible, so as to continue the revitalization of the Platinum Mile.

Please include this letter in the public record on the Draft Environmental Impact Statement regarding this project. Thank you for your consideration.

Very truly yours,

A handwritten signature in black ink that reads "Jeff Melby". The signature is written in a cursive style with a large, sweeping "J" and "M".

Jeff Melby
Sr. Vice President of Real Estate, Development & Construction
Life Time Fitness, Inc.

cc: Mayor Ron Belmont
Town/Village Board of Harrison
Patrick Cleary, AICP, PP



Memorandum

DATE: 23 June 2015
TO: Town of Harrison Planning Board
FROM: Niek Veraart, Vice President
SUBJECT: Residences at Corporate Park Drive- DEIS Scoping Comments

On behalf of the Purchase Environmental Protective Association (PEPA), Louis Berger has reviewed the Residences at Corporate Park Drive Draft Environmental Impact Statement (DEIS). A summary of key issues is provided below, followed by our detailed technical comments.

Summary of Key Issues

Fundamentally, the DEIS fails to address the SB-O district-wide impacts of changing the allowable uses to include residential and restaurants. This change in zoning does not just affect the proposed project site, but all parcels within the SB-O district. This issue was identified in our scoping comments, but was not considered in the DEIS. Specifically, the DEIS is deficient in the identification of both indirect and cumulative impacts.

- **The DEIS does not address indirect impacts**—the change in SB-O allowable uses by special exception use permit is likely to “induce” additional conversions of office space to residential or restaurant uses. The DEIS acknowledges the weakness of the Platinum Mile office market, making conditions ripe for induced land use changes if zoning regulations are modified. This issue is not addressed at all in the “Growth Inducing Aspects” section of the DEIS on page 5-2. To comply with SEQRA, the Town must consider how the change in allowable uses may spur additional conversions of office space to other uses.
- **The DEIS does not address cumulative impacts**—the cumulative district-wide SB-O redevelopment of multiple properties will have environmental and traffic impacts substantially greater than the redevelopment of any one property. This cumulative impact of multiple conversions to residential and restaurant uses must be analyzed for compliance with SEQRA. The applicant should be required to disclose their plans for other office parks they own within the SB-O district, including 106-108-109-110 Corporate Park Drive. Other office park owners within the SB-O district should be surveyed on their vacancy rates and the likelihood of their sites being redeveloped should the underlying zoning change. This data

can then be used to construct reasonably foreseeable development scenario to allow for a proper cumulative impact analysis.¹

The failure to address indirect and cumulative impacts in any manner requires a new or supplemental EIS.

The project site contains mature forested habitats and a wetland buffer area that should be protected by any redevelopment proposal. Instead, the applicant propose removal of 247 mature trees and encroachment into the wetland buffer. The DEIS arbitrarily dismisses a site plan alternative with a reduced development footprint based on the assertion that any reduction in the number of units would make the project not viable and that a 6-story facility would entail a substantial cost increase (without any evidence supporting such a cost increase). Should the project move forward, an environmentally sensitive revision to the site plan is needed to work within the constraints of the exiting habitat areas.

While improved since the initial iteration we reviewed, the presentation of traffic impacts in the DEIS is very misleading. The unrealistic scenario of the existing office buildings being fully occupied is used to make to make the incremental impact of the project appear smaller than it actually is.

The impact of the project on schools is presented based on hand-picked “comparative projects” outside of the Harrison Central School District that minimize the potential for impacts, but the process by which the comparative projects were selected is not transparent. Additional outreach to the affected school districts is required to obtain information on current capacity and potential impacts of increased enrollment. With respect to police, fire, and EMS, the DEIS acknowledges impacts in terms of the need for additional personnel, building space, and equipment. However, the DEIS does not quantify the impact of these additional costs to the town or include these costs in the fiscal impact assessment. The fiscal impact assessment is also incomplete in that it only addresses the impact on the school district.

As explained in detail in our previous comments, the scoping process for this project was flawed because the positive declaration (published in ENB on 5/13/2015) was not issued until after the 10-day scoping document review period.

¹ The Town may feel requiring the applicant for this action to complete the cumulative impact analysis is unduly burdensome, but that does not alleviate the requirement of the Town to comply with SEQRA in enacting changes to allowable uses in the SB-O district. The fact that future developments would require environmental reviews is not relevant since once the change in zoning is made, no cumulative impact analysis would be completed.

Detailed DEIS Comments

Alternatives

In our comments on the scoping document, we recommend that alternative sites within the control of the applicant be evaluated in the DEIS, including other under-utilized office space that may be suitable for conversion to mixed use. The applicant's marketing materials indicate control over 1.5 million square feet of office space in 14 buildings in the Platinum Mile area.² As shown in Attachment 1, most of these buildings were built in the 1970's and 1980's and have substantial vacant office space available. This suggests reasonable alternative sites may be available. The weakness of the Platinum Mile office market in general is recognized throughout the DEIS, including statements such as "efforts to lease the office space on this site, and on the "Platinum Mile" in general, have been unsuccessful over the past several years." (DEIS Page 4-3). The DEIS fails to even mention these alternative sites potentially available to the applicant. At a minimum, the FEIS must explain why alternative sites were not considered. If reasonable alternative sites are available, additional impact analysis should be completed for the site or sites to provide a comparative assessment of impacts as required by SEQRA.

The alternatives analysis fails to clearly disclose key environmental differentiators between the alternatives such as the number of trees impacted. Reducing the extent of encroachment on the habitat areas surrounding the site is one of the benefits of some of the alternatives, including Alternative F. The number of trees and acreage of vegetative habitats impacted should be added to Table 4-1 and discussed in the text.

Several unsupported and conclusory statements are made regarding Alternative F "modified dimension requirements". The DEIS states "to make this a viable project for the applicant, a certain number of units needs to be achieved, so the unit count has not changed in this alternative." This issue requires further elaboration. As stated currently, the applicant is implying that their proposed number of units is already at the minimum necessary to make the project financially viable and they cannot go any lower. The FEIS should provide documentation and supporting facts that anything less than 421 units is not viable. Specifically, a demonstration is needed of why a development of 50, 100, 200 or 300 units would not be financially viable. If a slightly smaller number of units is in fact viable, then Alternative F should be modified accordingly to account for a smaller scale development alternative.

2

<http://www.normandyrealty.com/normandycorporate/OurPortfolio/tabid/62/ctl/ViewProperty/mid/427/id/69/Default.aspx>

The DEIS makes an unsupported claim that the increase in building height that would be required under the version of Alternative F developed by the applicant would greatly increase construction costs. A detailed cost estimate for Alternative F should be presented for comparison to the cost of the proposed action so that it can be fairly judged whether the cost difference is as great as is implied. The cost estimate should include the construction method assumptions. If a slightly smaller number of units is feasible, a height increase may not be required at all and it becomes difficult to argue that Alternative F is not preferable to the proposed project.

There is a typographical error on DEIS page 4-4, first full paragraph under Big Box/Retail Use-incomplete sentence starting with "It is likely that..."

Land Use and Zoning

No discussion is provided of the potential impacts of the proposed zoning text amendments to the surrounding area, as is required by the scoping document. As noted in Louis Berger's memorandum dated April 7, 2015, the proposed project has foreseeable impacts in terms of the conversion of underutilized and/or outdated office space to other uses in all of the SB-O zoning district, beyond the project site. A Reasonable Worst Case Development Scenario (RWCDS) should be developed for the town-wide impacts of adding residential, retail and restaurants as permitted uses in the SB-O district. At minimum, a discussion of potential cumulative impacts should be provided to assess potential cumulative impacts to land use, traffic, and community character as a result of the proposed zoning text amendments. Further, SEQRA 617(c)(2) requires the lead agency to consider "reasonably related long-term, short-term, direct, indirect and cumulative impacts."

The discussion of anticipated impacts to zoning focuses entirely on the proposed zoning, which it concludes is consistent with the 2013 Comprehensive Plan recommendation for a new SB-MX (Mixed Use) zone. However, the proposed zoning would not create a new zone, but rather amend the SB-O zone to allow for Multi-Family Residential, Retail Use, Retail Service Use and Restaurant by special exception use permit. Per Appendix B1, Proposed Zoning Text Amendments, the proposed project would be inconsistent with the following recommendations in the Comprehensive Plan.

- "The regulations for this zone would be the same as the currently mapped SB-O zone." This is not the case as the proposed zoning text amendments recommend lot coverage of 45% in comparison to the current 20% stated in Harrison Code §235 Zoning Attachment 4.
- "Except that assisted-care, senior and other housing would potentially be allowable by special exception permit." The proposed zoning text amendments do not allow for assisted care or senior housing by special exception permit.

The land use and zoning impacts discussion in the DEIS does not consider the Comprehensive Plan's strong emphasis on the need for amendments to the SB zoning district regulations to emphasize stormwater management. The Comprehensive Plan notes that the *"regulations for the SB zoning districts should be examined to study various means of placing greater emphasis on stormwater management."*

This could include requirements that parking area drainage should be designed such that all surface runoff (both piped and overland flow) is conveyed through a vegetated swale, vegetated filter strip, created wetlands, rain gardens, detention basins with bio-filtration prior or other similar facility to discharge into existing wetlands, streams, ponds, or other waterbodies. In addition, landscaping requirements, which also benefit stormwater management, could be strengthened... As parking constitutes such a large proportion of impervious surfaces, consideration should also be given to adjusting the off-street parking requirements in light of new ideas such as landbanking or landscaping; the setting aside of landscape reserves that can be converted to parking if shortages arise. The use of porous surfaces should also be considered as an alternative to impervious ones.” The proposed zoning text amendments do not contain a single reference to stormwater management.

The discussion of existing zoning and the SB-O district should reference the requirements from Harrison Code §235-24 Required buffer strips; screening and landscaping that “required buffer strips in SB-O, SB-1, SB-35 and SB-100 Districts shall be left in natural woodland or, if not already wooded, shall be planted with dense evergreens and suitably maintained.”

Table 3A-1 states that lot coverage for the SB-O district is 45%, but Harrison Code §235 Zoning Attachment 4 identifies the maximum lot coverage for the SB-O district as 20%. This error appears to minimize the increase in proposed allowable lot coverage relative to existing requirements.

The discussion of existing zoning on the project site does not identify permitted or special exception accessory uses, as detailed in Harrison Code §235 Zoning Attachment 3.

Town/Village’s Hazard Mitigation Plan is a relevant planning study not discussed in the DEIS. Flooding is an identified hazard included in the Hazard Mitigation Plan. Although it is not located in the 100-year floodplain, certain stormwater structures drain runoff from the site into a headwater stream downslope to the east of the site and a wetland/intermittent stream offsite at the base of the project parcel’s west slope. Both of these water bodies ultimately drain to the Mamaroneck River. Therefore, a discussion of the Hazard Mitigation Plan should be included due site drainage patterns and the potential impacts of development on downstream flooding.

Natural Resources

Given the developed nature of the majority of the site, a redevelopment project could be devised that would avoid impacts to the sensitive forested habitats around the periphery of the site (including the wetland buffer on the eastern edge of the site). Instead, a project that involves clear cutting nearly the entire site and building out to the lot line is proposed. A harder look at avoidance measures through design modifications should be completed, rather than merely maximizing the potential building floor area. We note that such a design approach emphasizing the protection of existing forest could increase the attractiveness of the development to potential future tenants and the appearance of the development to existing residents and visitors to the town. The Town’s wetland regulations prohibit the issuance of a permit unless it is shown that “there is no reasonable alternative for the proposed

regulated activity on a site which is not a freshwater wetland or adjacent area.” This demonstration of why the impact to the wetland adjacent area is unavoidable is missing from the DEIS.

The DEIS states coordination with USFWS will be conducted regarding potential impacts to the habitat of the federally-listed Northern long-eared bat. This consultation should have been completed prior to the issuance of the DEIS so that USFWS’s guidance could be considered by the public. Given that the project impacts 247 trees of 8” dbh or greater, we recommend the FEIS include a mitigation measure establishing a construction window for tree clearing that would greatly reduce any chance of impacts to the Northern long-eared bat.

The proposed tree mitigation (100 trees) is inadequate given the number of mature trees impacted (247). Harrison’s Tree Protection Law requires replacement of trees when more than three trees are removed and a greater number of replacement trees is required for removing mature trees. “The plans shall provide for new trees to be planted in sufficient quantity, taking into account the anticipated survival rate, to replace the destroyed trees in kind or in suitable alternate species, at the discretion of the Town Tree Committee. Where the existing trees are too large to be replaced with trees of equivalent size, the planting of multiple trees of suitable species may be substituted.” Given the current site plan, there is insufficient room on site to provide for appropriate tree mitigation. Off-site tree mitigation options should be explored, one option would be restoration of a portion of an underutilized surface parking lot at the applicant-owned property at 106-110 Corporate Park Drive.

Page 3E-1 first paragraph line 3 says “wetland/stream feature to the east of the site”, this should be changed to “west of the site.”

On Exhibit 3E-1 there is an unlabeled red line near the 100’ label. The map needs to be clarified to explain what this line indicates.

The DEIS suggests the on-site stormwater treatment areas will support herpetofauna. On-site use of pesticides and herbicides that would impact such species should be prohibited accordingly.³

Stormwater

We reviewed the Stormwater Pollution Prevention Plan provided in the DEIS and have the following comments:

- Per NYSDEC Stormwater Management Design Manual Chapter 9, section 9.2, paragraph 5, proposed water quality volume provided should be greater than the existing provided for the

³ Bruehl, C. A., Schmidt, T., Pieper, S. & Alscher, A. Terrestrial pesticide exposure of amphibians: An underestimated cause of global decline? *Sci. Rep.* 3:1135, doi: 10.1038/srep01135. (2013).

redeveloped areas. There is an existing retention basin in the site. The plan needs to be revised to provide the existing stormwater quality calculations to show the existing retention basin is providing less than 25% water quality volume for the redeveloped areas, in order to use 25% per criteria in Section 9.2.1 B II of the NYSDEC Stormwater Management Design Manual.

- Incorporate the existing retention basin into the existing peak flow calculations for water quantity.
- Incorporate all the proposed features including the bioretention basin and sand filter into the proposed water peak flow calculations.
- Provide the drainage areas maps with the separate areas going to the sand filter, bioretention basin and CDS units.

Traffic and Transportation

The traffic analysis continues to provide information on the impacts of the project in comparison to the traffic that would be generated if the office park buildings on the site were fully occupied. The comparison should be made between the project and what will really happen, not an unrealistic hypothetical future condition. The first office park building has been vacant for several years and the second office building is less than 50% occupied. The future year is 2018 or less than 3 years from now. There is no indication that the offices will be occupied at 100% during the next three years even if there was no building project. The actual difference in the effect of 421 apartments and a restaurant on traffic will be an increase in traffic without the two office buildings being occupied. The applicant believes that the existing office buildings will not be occupied since they want to change the land use and demolish the existing buildings. The “No Build” scenario as defined in the DEIS should be removed and all comparisons made with the “No Action” scenario.

The executive summary of the traffic study is poorly worded especially when it discusses the increases in traffic. It gives the impression that there is a decrease in traffic if the offices remain underutilized and the opposite is true.

A weekend traffic analysis should be completed as this is when the incremental impact of the project may be greatest. The apartments will generate substantially more weekend trips than an office park. As a check, this analysis should see if the increased project weekend traffic will make a difference in intersection performance and impacts when considering the reduced level of the background weekend traffic.

The future year should be at least 10 years from completion of the project. Cumulative effects should be considered by developing a list of reasonably foreseeable future developments in the teardrop and surrounding areas. For example, what are the future plans for the office buildings owned by the applicant to the east at 106-108-109-110 Corporate Park Drive?

The traffic section of the DEIS should make it clear how pass-by trips were handled for the proposed restaurant. Were pass-by trips added to the turning movements into the driveways or were they diverted trips? If they were diverted trips, they should be added to the network. The traffic

section should also explain how the peak hour factor was established and whether or not it was based on traffic counts.

The DEIS needs to explain whether and how queueing impacts were considered. Did all the storage lane lengths meet the 95% storage lengths?

The assumption that 85% of AM peak hour trips to the restaurant will be from the development, transit trips, or local walking trips is not conservative and understates potential impacts. The analysis should be revised to assume primarily auto access as was done for the AM peak hour. Employees of nearby office parks are very likely to drive to the restaurant, it should not be assumed they will all walk even if connections between the sites are improved.

The ITE Land Use Category Mid-Rise Apartments LUC 233 is based on a very low number of studies (7) and has a very high standard deviation. The small number of studies makes the ITE trip generation rate unreliable. To establish the trip generation rate, field counts should be made at similar apartment complexes in the area.

To establish the actual General Office Park trip rate, counts should be made at the actual site. A field count is much more accurate than the ITE rates which have a high degree of variance.

The traffic study should identify if the rates used in the study are the peak hour rates or the adjacent street peak hour rates.

Air Quality and Noise

The air quality discussion states that newer more efficient HVAC equipment will be used, but provides no details on the capacity or fuel type of such equipment, nor the details of the existing HVAC equipment. The emissions of the existing development and proposed development should be quantified to provide a fair comparison. The DEIS states these issues have been reviewed by the applicant's air quality consultant, but no supporting facts demonstrating such a review has taken place have been provided. For example, what specifications/plans for the stationary sources were provided to the air quality consultant for review? An expert opinion in the absence of any supporting facts does not meet the SEQRA requirement for a hard look.

The DEIS states that an analysis was completed with FHWA's Traffic Noise Model (TNM) and the results showed noise levels at the project site below the NYSDOT Noise Abatement Criteria (NAC). First, the DEIS provides no information on what the actual predicted sound level was, where receptors were placed, or what the traffic volume input data was into TNM2.5. This supporting information needs to be provided in the FEIS. Second, an exceedance of the NAC would not be expected at this site, the purpose of suggesting a noise analysis in our scoping comments was to address traffic noise effects on health that can occur at very low levels, well below the NAC. The NAC are not impact criteria, but rather are required by FHWA's noise regulations for determining when mitigation needs to be considered for highway projects. A noise level below the NAC is not synonymous with "no impact" for purposes of SEQRA. We agree that the health risk of noise

exposure can be addressed through the acoustical design of the building as stated in the DEIS, however the specific acoustical design commitments (such as buildings and walls of particular sound transmission class rating) should be identified during the environmental review process.

Visual Resources and Community Character

Overall, this section of the DEIS focuses on visual resources and does not discuss community character impacts more generally (encompassing quality of life issues such as traffic and noise). The DEIS does not address the condition for redevelopment of the teardrop area in the Comprehensive Plan that it “*does not burden or negatively affect the quality of life of neighboring communities, and will not result in increased height or density.*” The project involves both an increase in height and density, which is inconsistent with the redevelopment concept envisioned in the Comprehensive Plan. The impact on quality of life in neighboring communities is not addressed in this section. Importantly, the visual impact analysis focuses on the view from Corporate Park Drive itself and does not discuss how the project could change views for surrounding communities outside the teardrop area.

The discussion of existing visual environment conditions states “with the exception of the East Ridge Enrichment Center” but does not describe the visual character of that day care facility.

The discussion of anticipated impacts should clearly describe where and how the building is situated on the site (i.e., the site plan) in relation to the existing office buildings. It presently states that the project will be a “multifamily residential building (with structured parking) with 4 to 5 stories stepping up the site and fit into existing topography.” However, there is no discussion of where the building footprint would be in relation to the existing two footprints or changes in massing.

The Anticipated Impacts section should discuss where the heights change from 4 to 5 stories and how the roofline varies, how high the building is in relation to the existing buildings, and how it would fit into existing topography.

All comparisons in the Anticipated Impacts section should be quantified. For example, the addition of “slightly more impervious surface area” than the existing should be quantified; and the setbacks including a “smaller setback” for the restaurant should be quantified. “Some of the knoll on the north side” that would be cut to accommodate the new building should also be quantified.

The section states both “with a wooded landscape perimeter to remain in place or be enhanced to the extent practical,” and later “the wooded perimeter on the north and east sides of the site would be reduced in order to accommodate the proposed site circulation and emergency access.” The Anticipated Impacts should be clarified, and be consistent.

The Anticipated Impacts section should note where and what type of vegetation (grass, trees) would be removed that would result in “slightly more impervious surface area,” presumably along the north and east sides of the site.

Community Facilities and Services

The Proposed Project is expected to generate new jobs in building management and maintenance, retail and restaurant services. An estimate of the number and types of jobs as well as wages needs to be included in the DEIS. If project-specific information is not available, the number of jobs can be estimated based on the square footage of the proposed space. County-level average wages for the relevant industry can be obtained from the Bureau of Labor Statistics. The additional jobs should be considered in assessing the impact on community facilities and services.

Schools

The applicant submitted a written request to the Harrison Central School District to obtain information about the capacity of the schools that would be serving the project. Because the school district did not respond to the inquiry, the applicant's alternative method consisted of using historic peak enrollment data as a proxy for capacity (Page 3J-2). This methodology is problematic because it does not account for changes in classroom layout or support space over time that may have bearing on the actual number of seats available. Additional outreach efforts to the school district are needed to get an understanding of the true capacity of each of the schools and the number of additional students that could be accommodated without impacting class sizes. As was previously recommended in our scoping comments, interviews should be conducted with a representative from each school to assess qualitatively the impact the project would have on the school's capacity.

The need for interviews with school officials is particularly important for Harrison High School, which the DEIS data shows as having increasing enrollment in recent years, with a 2014/2015 enrollment of 1,060 being the highest enrollment out of the historical enrollment data presented in Table 3J-1A. The DEIS does not address the potential capacity issue at Harrison High School, focusing instead entirely on the declining Purchase Elementary school enrollment (which presumably indicates capacity for additional students).

The DEIS attempts to minimize the project impact on schools by using a selection of hand-picked "comparable" projects outside of the Harrison Central School District as the basis for the school children generated per unit (instead of accepted planning methods). It is not clear how the selection of projects was made and whether objective criteria were used consistently to select projects. In particular, the determination of whether or not a project is comparable did not consider the quality of the schools where the project is located. For example, projects in the City of White Plains may

have real or perceived lower school quality, which could in turn affect the decisions of parents in deciding where to locate.⁴

In absence of an objective, documented selection process, alternative method would be to calculate demographic multipliers using the most recent Public Use Microdata Sample (PUMS) data from the US Bureau of Census for the Public Use Microdata Areas (PUMAs) in Westchester County, taking into account the number of bedrooms, housing type (number of units) and tenure (renter-occupied) of the Proposed Project. At a minimum, the FEIS should present a sensitivity analysis of school children generated with an alternate method for comparison to the comparable project method.

The DEIS fails to provide information on the number of teachers and staff and the ensuing teacher/student ratios as was requested in the scoping comments.

On DEIS Page 3J-3, Tables 3J-2, 3J-3 and 3J-4, the source of the Harrison School District budget information is not provided.

Police, Fire and EMS

The DEIS utilizes model factors from the Urban Land Institute Development Assessment Handbook to estimate the additional police/fire/EMS personnel, facility space and vehicles needed to serve the new population, but does not monetize these additional expenses. These expenses should be quantified so that they can be compared to the Proposed Project's potential revenues as part of the Fiscal Impact section. Without taking into account the full costs of the development, the project benefits are overstated. One potential approach to estimate the cost to local government is to use the town budget for Public Safety from the New York State Office of the State Comptroller, calculate the per capita cost for public safety and then subsequently apply the per capita cost to the estimated population increase. The cost to local government generated by the new jobs also needs to be assessed.

At the time of the DEIS preparation, the Police Department had not responded to the inquiries from the applicant's consultant on topics such as the average response time to the site and any concerns with site access. This information needs to be included in the FEIS, follow-up interviews with the Police Department should be conducted if necessary so that their opinion is known and considered before a final decision is made by the Town.

The 2013 Master Plan makes it clear that a concern of the town is providing adequate emergency access to potential future residential uses in the teardrop area. The DEIS avoids addressing this area of potential inconsistency with the Master Plan, focusing primarily on the adequacy of access internal to the project site. The transportation section states that no connection (emergency or otherwise)

⁴ For example, NYSED's release of 2013/2014 test results shows 50% of Purchase Elementary third graders received a "proficient" score of 3 or 4 on the ELA exam, compared to 29% for the White Plains District.

between Manhattanville Road and Corporate Park Drive is part of the project: "The Applicant is not proposing any change to this existing condition." This statement is consistent with our scoping comments that noted the 1984 stipulations prohibit the opening (connection) of Corporate Park Drive & Manhattanville Road (unless Purchase Street is closed), irrespective of the nature of the connection. Given the reality that no connection between Manhattanville Road and Corporate Park Drive can be made, the issue is whether or not it is safe from an emergency response perspective for residential housing (in part targeted at seniors) to be located within the transportation network constraints of the teardrop area. If it is not safe, such residential uses should not be approved. This issue should be addressed explicitly in further coordination with the emergency response providers and discussed in the FEIS given the large number of residences added to the teardrop by this project.

On page 3J-10, correspondence with the Fire Department is referenced as being located in Appendix B2. This correspondence was missing from the web posting of the DEIS and should be circulated to interested organizations and individuals.

With respect to water supply for firefighting, the final scoping document requires the DEIS to "Identify source of water supply and evaluate pressure and required storage volumes." Information on the existing water supply is provided in the utilities section of the DEIS, but the adequacy of this supply is glossed over with vague references to a "preliminary analysis" that indicated the supply is sufficient (no details of which are provided) and comparison to similar projects. The issue of required water storage volumes is not addressed at all. The DEIS suggests the adequacy of the water capacity for firefighting purposes will be determined prior to construction, but this deferral of analysis that was required by the scoping document until after the SEQRA process is complete is not permissible. The analysis needs to be done before the town makes a decision on the project.

Fiscal Impacts

The fiscal impact section of the DEIS starts with a demographic overview of the town, surrounding municipalities and the County. The demographic overview should include population projections for the year the Proposed Project is expected to be fully operational. Because the Proposed Project will also create jobs, the DEIS also needs to include an overview of employment in the County and local area. Historic and recent County level employment information can be obtained from the Bureau of Labor Statistics while local employment information can be obtained from the Longitudinal Employer-Household Dynamics (LEHD) program from the Bureau of Census. Employment projections should be included for the year that the Proposed Project is expected to be fully operational. The DEIS points out that the average age of Harrison residents is relatively high and concludes that young people are not moving into the area. This statement should be supported using migration data by age as opposed to basing it on median age data for one point in time.

A fiscal profile consisting of expenditure and revenue data should be provided for each of the affected local governments: county, town, village and special districts. Recent expenditure and

revenue data can be obtained online from the New York State Office of the State Comptroller (NYSOSC). Expenditures should be broken down by service category (including debt service); revenues should be broken down by source. The profiles should also include per capita expenditures for each service category, which are calculated by dividing a service category's total expenditures by the total population.

The DEIS quantifies the fiscal impact on the school district, but does not quantify the impact on other local governments. The fiscal impact on the county, town, village and other special districts that will be generated by the increased population and employment associated with the Proposed Project needs to be assessed as part of this chapter. More specifically, the additional expenditures for each of the local governments need to be estimated and compared with the additional tax revenues that each local government will receive (presented in Table 3K-4 of the DEIS). If the net impact is negative (i.e., new expenditures exceed new revenues) mitigation measures need to be taken to address the negative impact. Potential methodologies to estimate additional expenditures associated with the Proposed Project include the per capita multiplier method (for residential component), the case study method, and the proportional valuation method (for commercial component) as described in the Fiscal Impact Handbook (1978) by Burchell and Listokin.

Market Study

The "market study" provided in DEIS Appendix C does not clearly support the demand for the Proposed Project. While providing information on housing demand and supply, the analysis does not systematically assess the projected rental housing demand (current renters plus population growth), the projected rental housing supply (current units plus proposed and planned units), and the Proposed Project's ability to meet demand.

Specific comments

Page 1: I. Introduction

The study states that "This market study provides data to indicate whether there are a sufficient number of households who would occupy the proposed number of rental units in the proposed price range ...] While that is the purpose of a market study, the Market Study under review does not consider housing affordability and does not compare the proposed rents with the household incomes of potential tenants or with existing rents.

Page 2: II. Market Area

Include map of the market area, project site. Explain basis for selecting market area.

Page 3: IV. Regional Location and Access

Include map of regional location and access.

Page 4: V. Demographic Trends

The following items need to be added to Section V to provide a more complete assessment of these topics:

- Market area and Westchester County population projections are key inputs to understand future demand for housing (Potential source: New York Metropolitan Transportation Council (NYMTC))
- Current employment along the I-287 Corridor and historical, current and projected employment in market area communities and in Westchester County (Potential source: Longitudinal Employer-Household Dynamics (LEHD); Bureau of Labor Statistics (BLS))
- Place of work and commuting time of market area residents (Potential source: ACS)
- Place of residence of employees working in Harrison and along the I-287 Corridor (Potential source: LEHD)
- In Table 2 on page 6 median household income is provided for the localities in the market area. Using Public Use Microdata Sample (PUMS) data from the US Bureau of Census for the Public Use Microdata Areas (PUMAs) in Westchester County will allow estimating household income by tenure and by age group and other demographic characteristics and provide a more detailed picture of current rental unit occupants.
- Housing characteristics presented in Table 3 to 6 on page 7 to 8 are limited to total number of units, occupied units, owner-occupied units, renter-occupied units, and average household size by tenure, vacancy rates and year built from the 2008-2012 American Community Survey (ACS). More recent data are available from the 2009-2013 ACS. Additional key housing stock information is available from ACS and includes information on the type of structures, number of bedrooms and monthly rent. In addition, as indicated above, PUMS data can be used to cross-tabulate housing type with other demographic characteristics such as household income to give a more detailed picture of the characteristics of tenants occupying units similar in size.

Page 9: VI. Other New Construction Residential Rental Developments Existing and Proposed/Planned

This section includes information on current housing supply as well as proposed and planned housing supply in the market area. Table 8 lists new residential units in the pipeline in developments with at least 50 units. Additional information recommended to obtain more complete picture of the future housing supply includes:

- Table of characteristics of currently available rental properties in market area. Key characteristics include rent, size, bedrooms, year of construction, amenities. (Potential source: Zillow)
- Table 8 needs to be expanded to provide a comprehensive list of pipeline rental developments. Include developments with less than 50 units.
- Table of characteristics of pipeline projects that are listed in expanded (see bullet above) Table 8. Key characteristics include rent, size, bedrooms, year of construction, amenities.

Workforce Housing Coalition

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(914) 683-1010

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Friday, June 26, 2015

Mr. Thomas Heaslip
Chairman
Town of Harrison Planning Board
1 Heineman Place
Harrison, NY 10528

Re: Referral File No. HAR 15-001B—The Residences at Corporate Park Drive

Dear Mr. Heaslip:

Thank you for listening to our concerns at the public hearing for the DEIS for The Residences at Corporate Park Drive.

You correctly said that many of our concerns about affordable housing policy should be addressed to the Town Board. You said that you could only “recommend,” and I said, “Then recommend.”

There is nothing to prevent the Planning Board from requiring consideration of the impact of the project on the need for affordable housing in the Draft Environmental Impact Statement, as we requested on January 21 at the scoping session. It is just as important as the number of school children generated, or the traffic.

Given the crisis of affordability in Harrison and Westchester County, one could argue that it's even more important. And given the U.S. Supreme Court's decision yesterday affirming consideration of disparate impact under the Fair Housing Act, one could argue that the town **MUST** consider whether the failure to include affordable housing has a disparate impact on protected classes. Westchester County HUD Monitor James Johnson has cited zoning in the Town of Harrison as discriminatory and in violation of the Fair Housing Act (Huntington standards) and Berenson Line of Cases. With this record, does the developer and the Planning Board really want to risk litigation for failing to include consideration of affordable housing in the DEIS?

In order to help you and the board understand the need for consideration of the impact of the project on affordable housing need, I provide the attached demographic data.

Summary of Attached Maps

First of all, there has been a dramatic rise in cost burdens for Harrison residents, both homeowners and renters. In 2000, 31.6% of homeowners were paying more than 30% of their income for housing. By 2013, that number had risen to 42.3%. The percent of severely cost-burdened homeowners, meaning families paying more than 50% of their income for housing, rose from 16.2% in 2000 to 25.6% in 2013.

Renters have also felt the housing pinch. In 2000, 36% of renters were cost-burdened compared to 51% in 2013. Looking at the percentage of renters with severe cost burdens, paying over 50% of their income for housing, that number was 15.4% in 2000, and almost doubled in percentage terms to 27%, in 2013.

These are devastating statistics for the quality of life of Harrison's residents and unsustainable. Reflecting the strain, Harrison is facing an exodus of young adults. The over all percentage loss of 25-34 year olds is about 12% since the 2000 census but it's much higher in the richest zip codes like 10577, where Purchase lost over half of this population cohort since 2000.

The population of 35-44 year olds has also declined, with a loss of 17% over all, and 56% in the 10577 zip code.

If you look at a website maintained by the Department of Transportation and HUD, combining the cost of housing and transportation, you see just how unaffordable Harrison is for the typical working individual in the region making about \$33,000 per year. Harrison's average combined housing and transportation costs would take 90% of their salary.

But the town has maintained its lack of diversity. Harrison continues to have a diversity index of only 33 versus 61 for Westchester County as a whole. Harrison's African American population is just over 2%.

Business vacancies in Harrison as a whole reached 18.2% in the first quarter of 2015 and 21% in the 10577 zip code.

All of this data argue for growth that will swell tax revenues and restore economic vitality in the tax cap era. But growth this time should at least

consider the approximately 42% of the Westchester County population earning under 80% of the Area Median Income (about \$85,000 for a family of four) that would be eligible for affordable housing. To ignore this population would be unethical and illegal.

I hope this snapshot using U.S. Census data gives you enough ammunition to recommend that the effect of the project on the affordability crisis in the town of Harrison represents an impact that should be included in the DEIS.

Sincerely,

A handwritten signature in black ink, appearing to read "Alexander H. Roberts". The signature is fluid and cursive, with a large initial "A" and "R".

Alexander H. Roberts
Westchester Workforce Housing Coalition

c.c. Rosemarie Cusumano

Map of Census Tract (36119008602, NY) with Percent of all homeowners who are burdened by housing costs in 2000.

Percent of all homeowners who are burdened by housing costs in 2000.

Percent of owner households for whom selected monthly owner costs are 30% or more of household income in 2000. Owner housing costs include all mortgage principal payments, interest payments, real estate taxes, property insurance, homeowner fees, condo or coop fees and utilities (not including telephone or cable television). Percentage calculations were suppressed in cases where the denominator of the calculation was less than 10 of the unit that is being described (e.g., households, people, households, etc). Such areas are represented as having "Insufficient Data" in the map. Denominators for percentage calculations were created by summing all of the component data items in a particular dataset.



Legend

Year: 2000

Variable: %

- Insufficient Data
- 15.59% or less
- 15.60% - 19.40%
- 19.41% - 23.56%
- 23.57% - 29.57%
- 29.58% or more

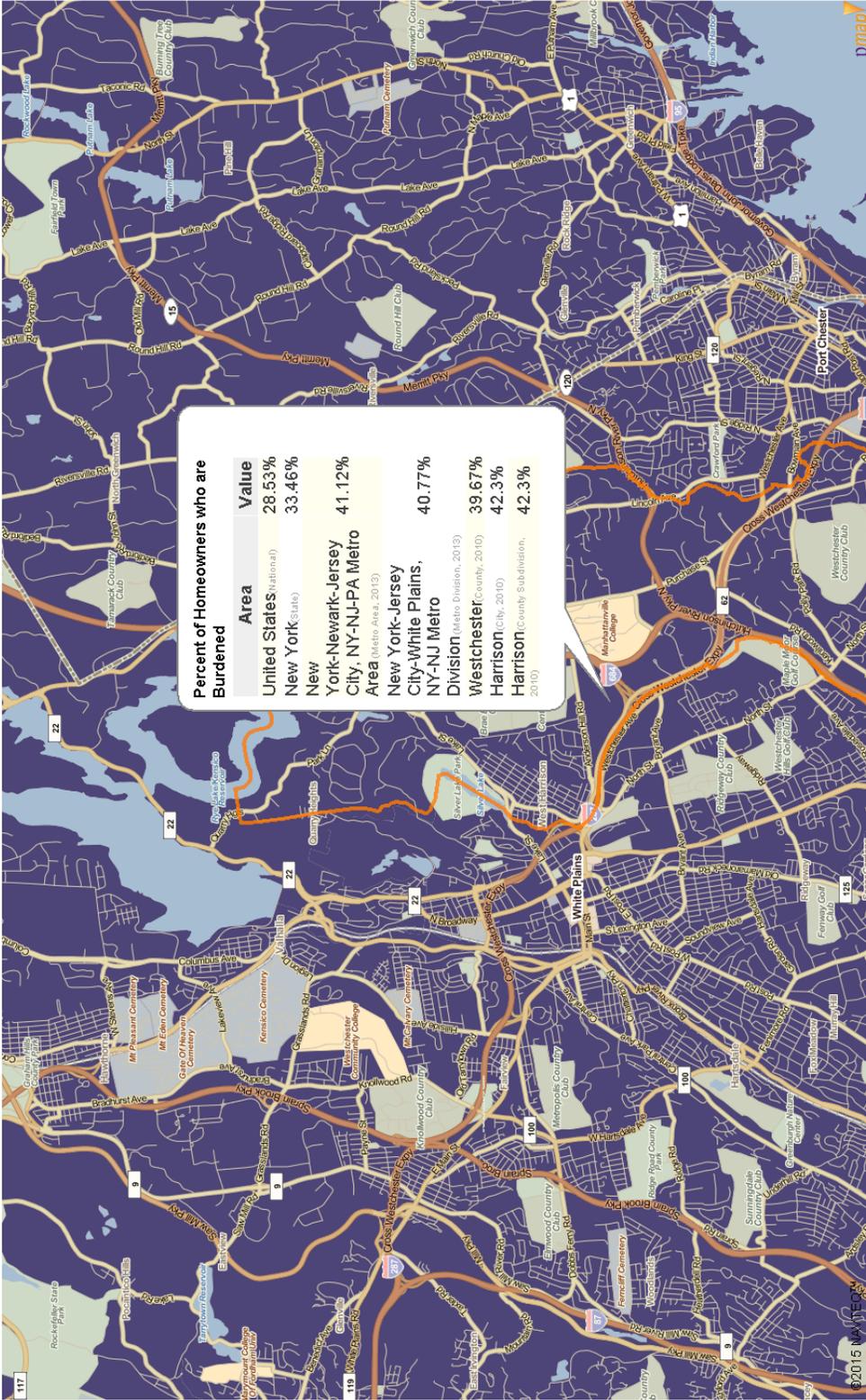
Shaded by: Census Tract, 2000

Source: Census

Map of Harrison with Estimated percent of all homeowners who are burdened by housing costs between 2009-2013.

Estimated percent of all homeowners who are burdened by housing costs between 2009-2013.

Estimated percent of owner households for whom selected monthly owner costs are 30% or more of household income between 2009-2013. Owner housing costs include all mortgage principal payments, interest payments, real estate taxes, property insurance, homeowner fees, condo or coop fees and utilities (not including telephone or cable television). Percentage calculations were suppressed in cases where the denominator of the calculation was less than 10 of the unit that is being described (e.g., thresholds, people, households, etc). Such areas are represented as having 'Insufficient Data' in the map. Denominators for percentage calculations were created by summing all of the component data items in a particular dataset. According to the Census, these data should not be compared with 2000 Census figures.



Legend

Year 2013

Variable %

- Insufficient Data
- 14.85% or less
- 14.86% - 20.37%
- 20.38% - 25.03%
- 25.04% - 31.06%
- 31.07% or more

Shaded by County Subdivision, 2010

Source: Census



Map of Census Tract (36119008602, NY) with Percent of all homeowners who are severely burdened by housing costs in 2000.

Percent of all homeowners who are severely burdened by housing costs in 2000.

Percent of owner households for whom selected monthly owner costs are 50% or more of household income in 2000. Owner housing costs include all mortgage principal payments, interest payments, real estate taxes, property insurance, homeowner fees, condo or coop fees and utilities (not including telephone or cable television). Percentage calculations were suppressed in cases where the denominator of the calculation was less than 10 of the unit that is being described (e.g., households, people, householders, etc.). Such areas are represented as having "Insufficient Data" in the map. Denominators for percentage calculations were created by summing all of the component data items in a particular dataset.

Legend

Year: 2000

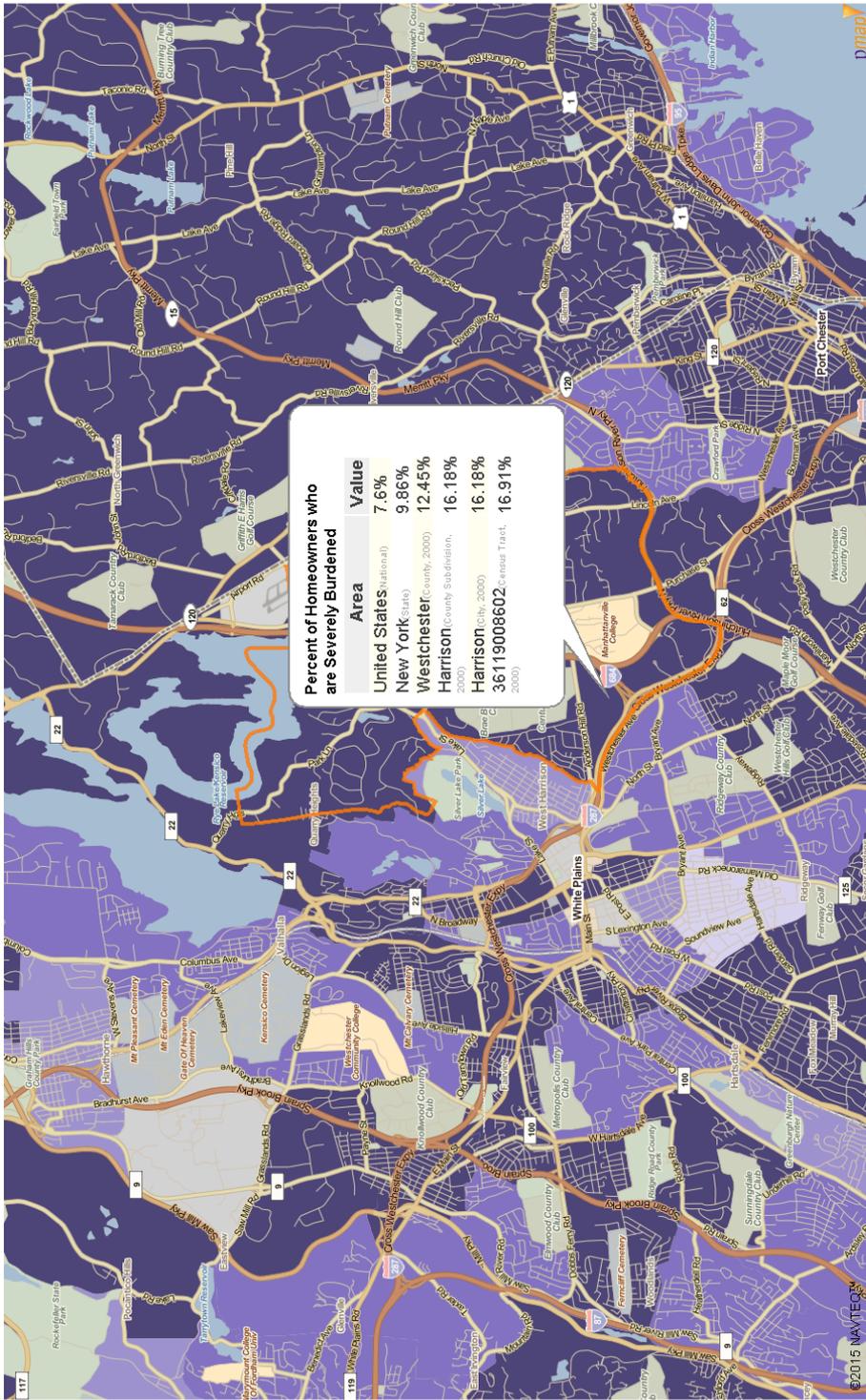
Variable: %

- Insufficient Data
- 4.46% or less
- 4.47% - 6.31%
- 6.32% - 8.41%
- 8.42% - 11.73%
- 11.74% or more

Shaded by: Census Tract, 2000

Source: Census

THE policymap

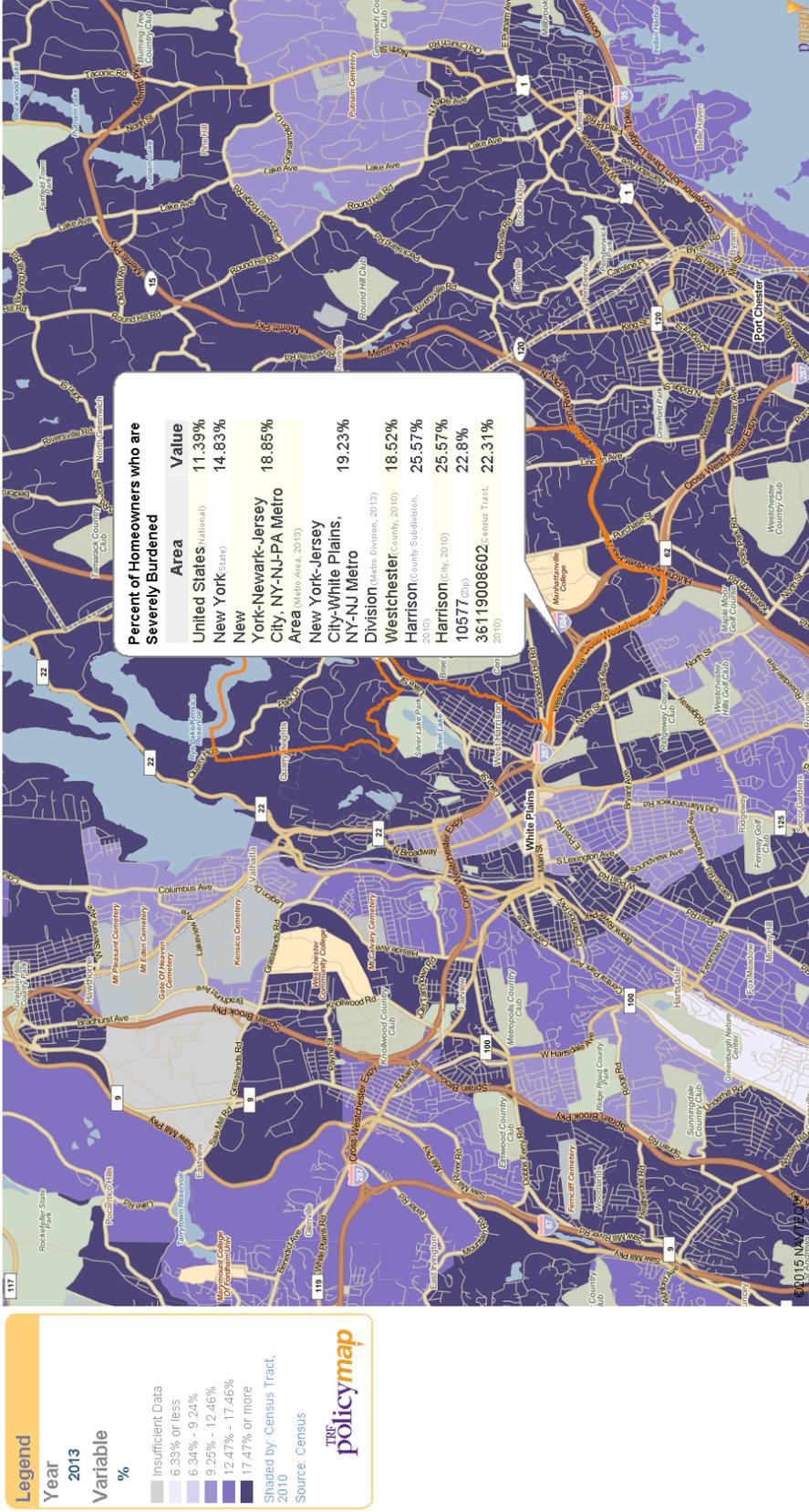




Map of Census Tract (36119008602, NY) with Estimated Percent of all homeowners who are severely burdened by housing costs between 2009-2013.

Estimated percent of all homeowners who are severely burdened by housing costs between 2009-2013.

Estimated percent of owner households for whom selected monthly owner costs are 50% or more of household income between 2009-2013. Owner housing costs include all mortgage principal payments, interest payments, real estate taxes, property insurance, homeowner fees, condo or coop fees and utilities (not including telephone or cable television). Percentage calculations were suppressed in cases where the denominator of the calculation was less than 10 of the unit that is being described (e.g., households, people, householders, etc). Such areas are represented as having 'Insufficient Data' in the map. Denominators for percentage calculations were created by summing all of the component data items in a particular dataset. According to the Census, these data should not be compared with 2000 Census figures.



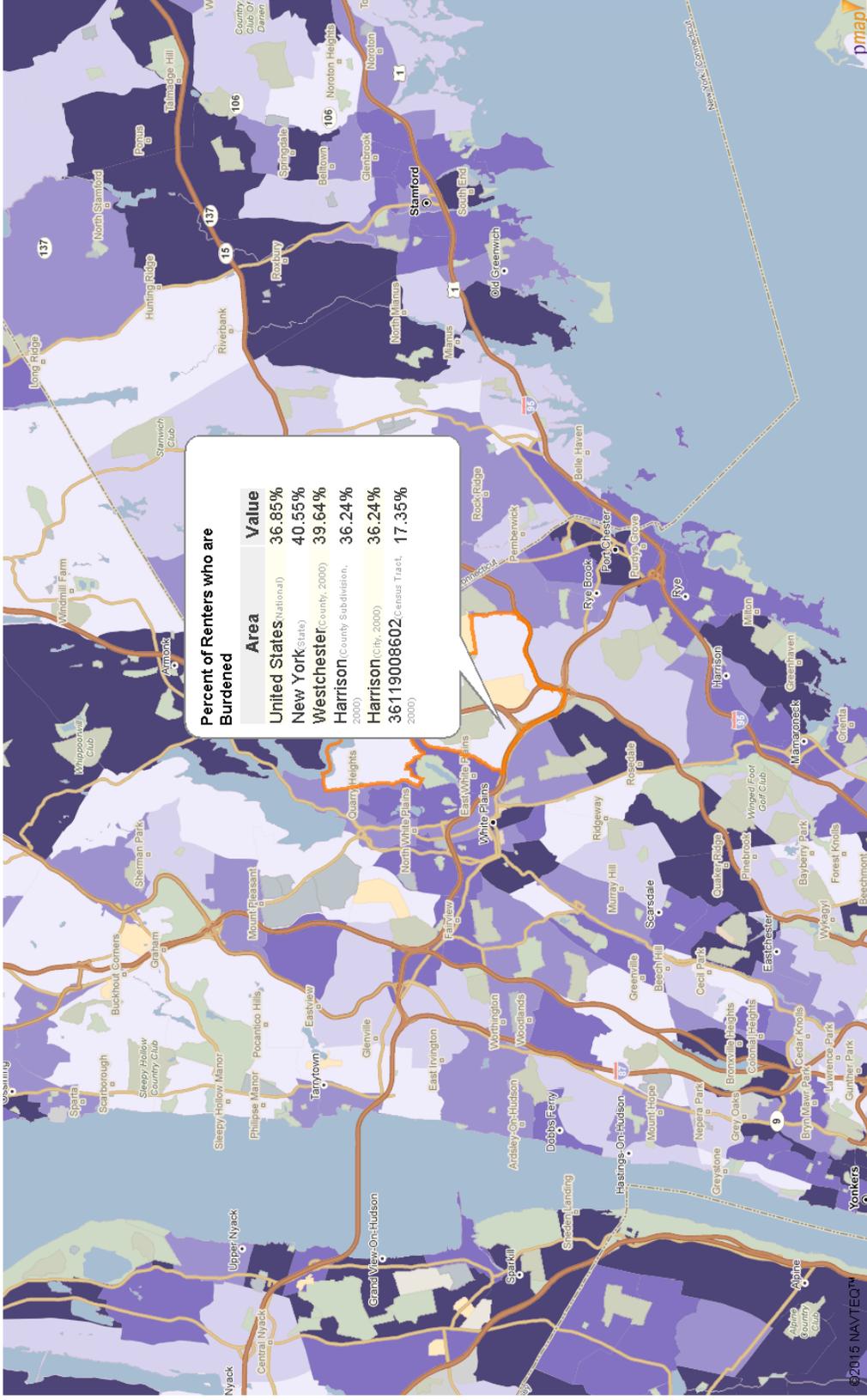
PolicyMap is a service of The Reinvestment Fund

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Map of Census Tract (36119008602, NY) with Percent of all renters who are cost burdened in 2000.

Percent of all renters who are cost burdened in 2000.

Percent of renter households for whom gross rent is 30% or more of household income in 2000. Gross rent is the contract rent plus the estimated average monthly cost of utilities (electricity, gas, water and sewer) and fuels (oil, coal, kerosene, wood, etc.) if these are paid by the renter (or paid for the renter by someone else). Gross rent is intended to eliminate differentials that result from varying practices with respect to the inclusion of utilities and fuels as part of the rental payment. Percentage calculations were suppressed in cases where the denominator of the calculation was less than 10 of the unit that is being described (e.g., households, people, householders, etc.). Such areas are represented as having "Insufficient Data" in the map. Denominators for percentage calculations were created by summing all of the component data items in a particular dataset.



Legend

Year: 2000

Variable: %

- Insufficient Data
- 24.43% or less
- 24.44% - 31.13%
- 31.14% - 36.81%
- 36.82% - 43.49%
- 43.50% or more

Shaded by: Census Tract, 2000

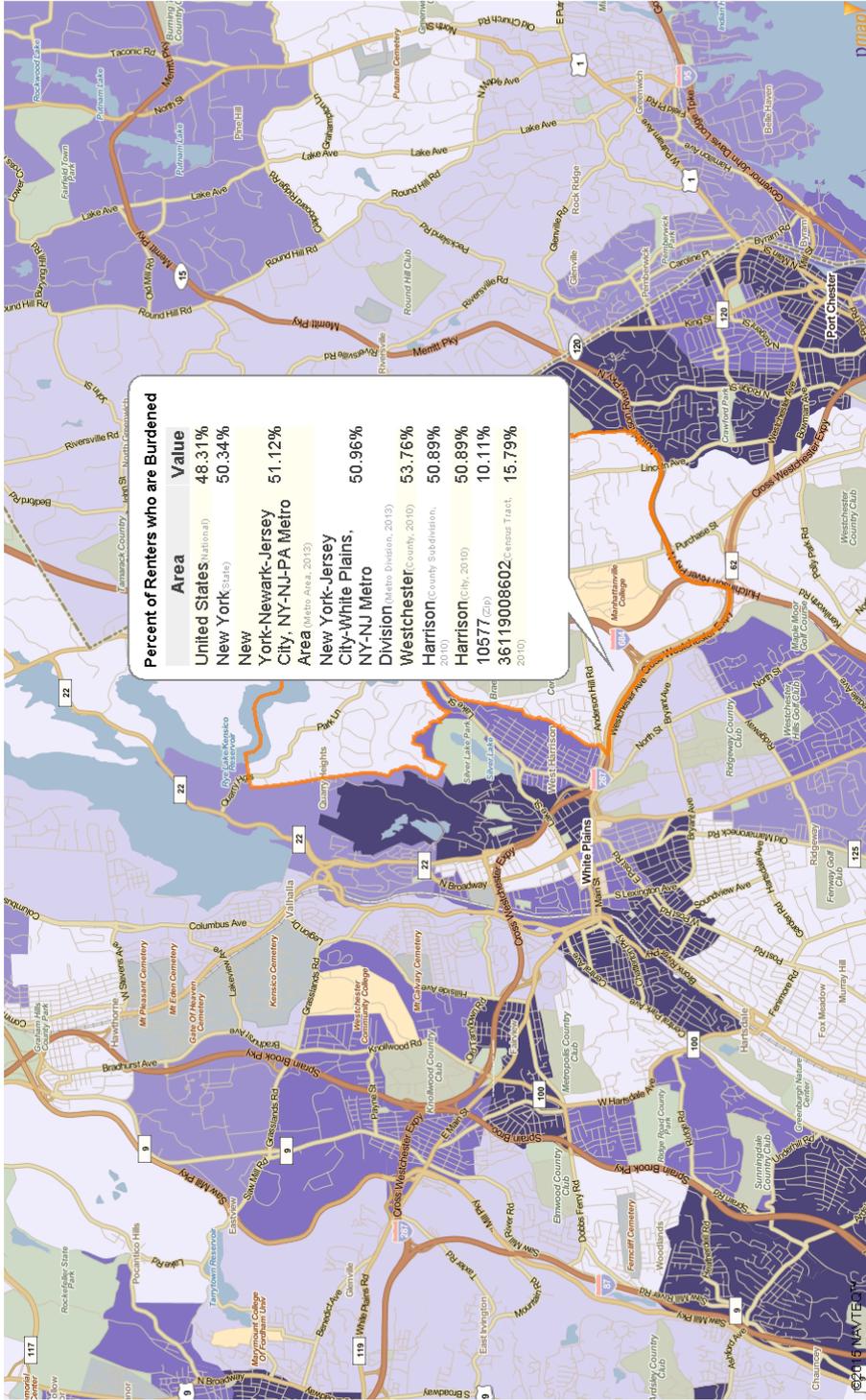
Source: Census



Map of Census Tract (36119008602, NY) with Estimated percent of all renters who are cost burdened between 2009-2013.

Estimated percent of all renters who are cost burdened between 2009-2013.

Percent of renter households for whom gross rent is 30% or more of household income between 2009-2013. Gross rent is the contract rent plus the estimated average monthly cost of utilities (electricity, gas, water and sewer) and fuels (oil, coal, kerosene, wood, etc.) if these are paid by the renter (or paid for the renter by someone else). Gross rent is intended to eliminate differentials that result from varying practices with respect to the inclusion of utilities and fuels as part of the rental payment. Percentage calculations were suppressed in cases where the denominator of the calculation was less than 10 of the unit that is being described (e.g., households, people, householders, etc.). Denominators for percentage calculations were created by summing all of the component data items in a particular dataset. According to the Census, these data should not be compared with 2000 Census figures.



Legend

Year
2013

Variable
%

- Insufficient Data
- 32.08% or less
- 32.08% - 41.89%
- 41.90% - 50.00%
- 50.01% - 58.86%
- 58.87% or more

Shaded by: Census Tract, 2010
Source: Census



Map of Census Tract (36119008602, NY) with Percent of all renters who are severely cost burdened in 2000.

Percent of all renters who are severely cost burdened in 2000.

Percent of renter households for whom gross rent is 50% or more of household income in 2000. Gross rent is the contract rent plus the estimated average monthly cost of utilities (electricity, gas, water and sewer) and fuels (oil, coal, kerosene, wood, etc.) if these are paid by the renter (or paid for the renter by someone else). Gross rent is intended to eliminate differentials that result from varying practices with respect to the inclusion of utilities and fuels as part of the rental payment. Percentage calculations were suppressed in cases where the denominator of the calculation was less than 10 of the unit that is being described (e.g., households, people, householders, etc). Such areas are represented as having "Insufficient Data" in the map. Denominators for percentage calculations were created by summing all of the component data items in a particular dataset.



Legend

Year: 2000

Variable: %

- Insufficient Data
- 9.08% or less
- 9.09% - 13.28%
- 13.29% - 17.20%
- 17.21% - 22.32%
- 22.33% or more

Shaded by: Census Tract, 2000

Source: Census

Map of Census Tract (36119008602, NY) with Estimated percent of all renters who are severely cost burdened between 2009-2013.

Estimated percent of all renters who are severely cost burdened between 2009-2013.

Percent of renter households for whom gross rent is 50% or more of household income between 2009-2013. Gross rent is the contract rent plus the estimated average monthly cost of utilities (electricity, gas, water, and sewer) and fuels (oil, coal, propane, wood, etc.) if these are paid by the renter (or paid for the renter by someone else). Gross rent is intended to eliminate differentials that result from varying practices with respect to the inclusion of utilities and fuels as part of the rental payment. Percentage calculations were suppressed in cases where the denominator of the calculation was less than 10 of the unit that is being described (e.g. households, people, householders, etc). Denominators for percentage calculations were created by summing all of the component data items in a particular dataset. According to the Census, these data should not be compared with 2000 Census figures.

Legend

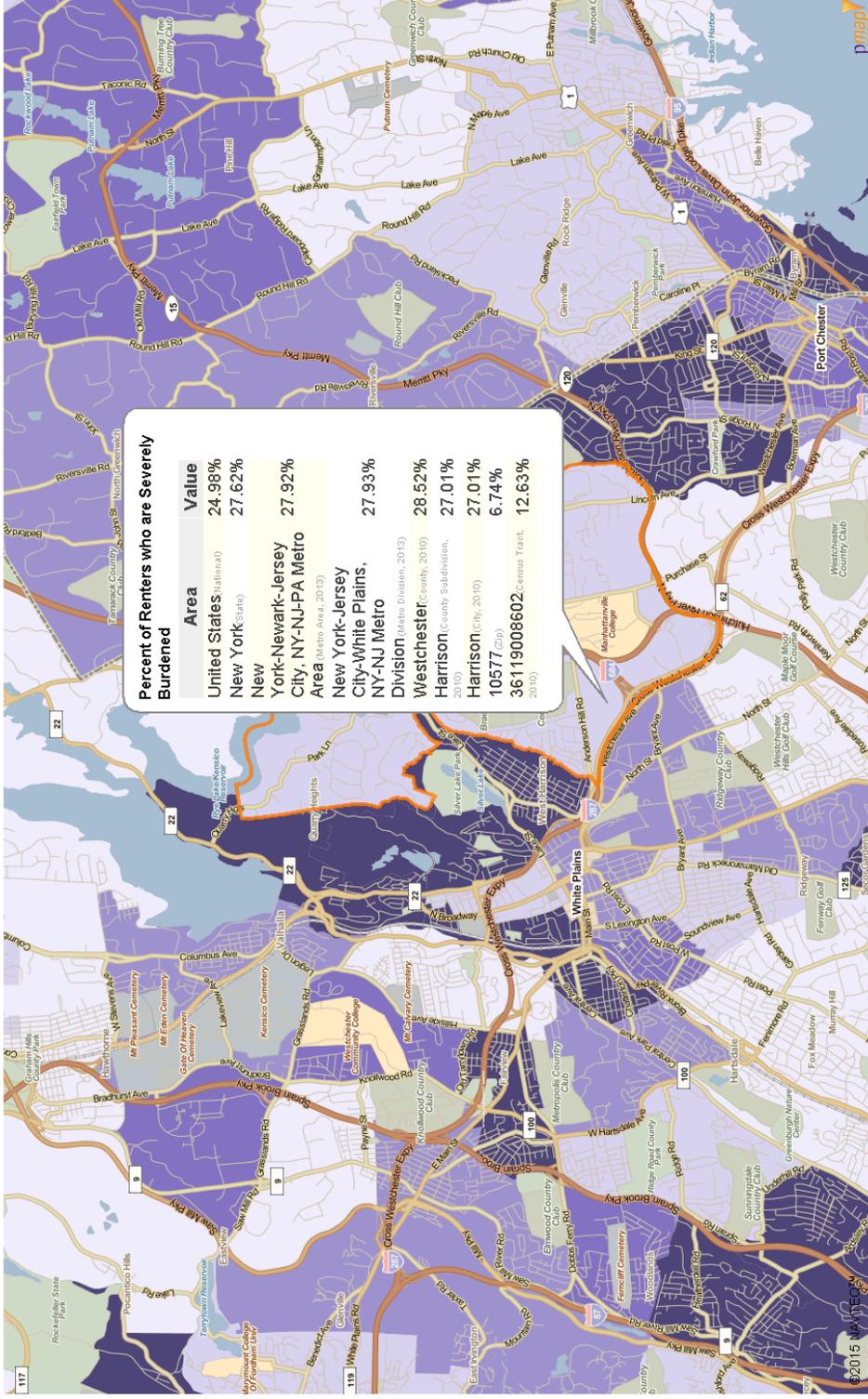
Year
2013

Variable
%

- Insufficient Data
- 12.27% or less
- 12.28% - 19.18%
- 19.19% - 25.50%
- 25.51% - 33.49%
- 33.50% or more

Shaded by: Census Tract,
2010

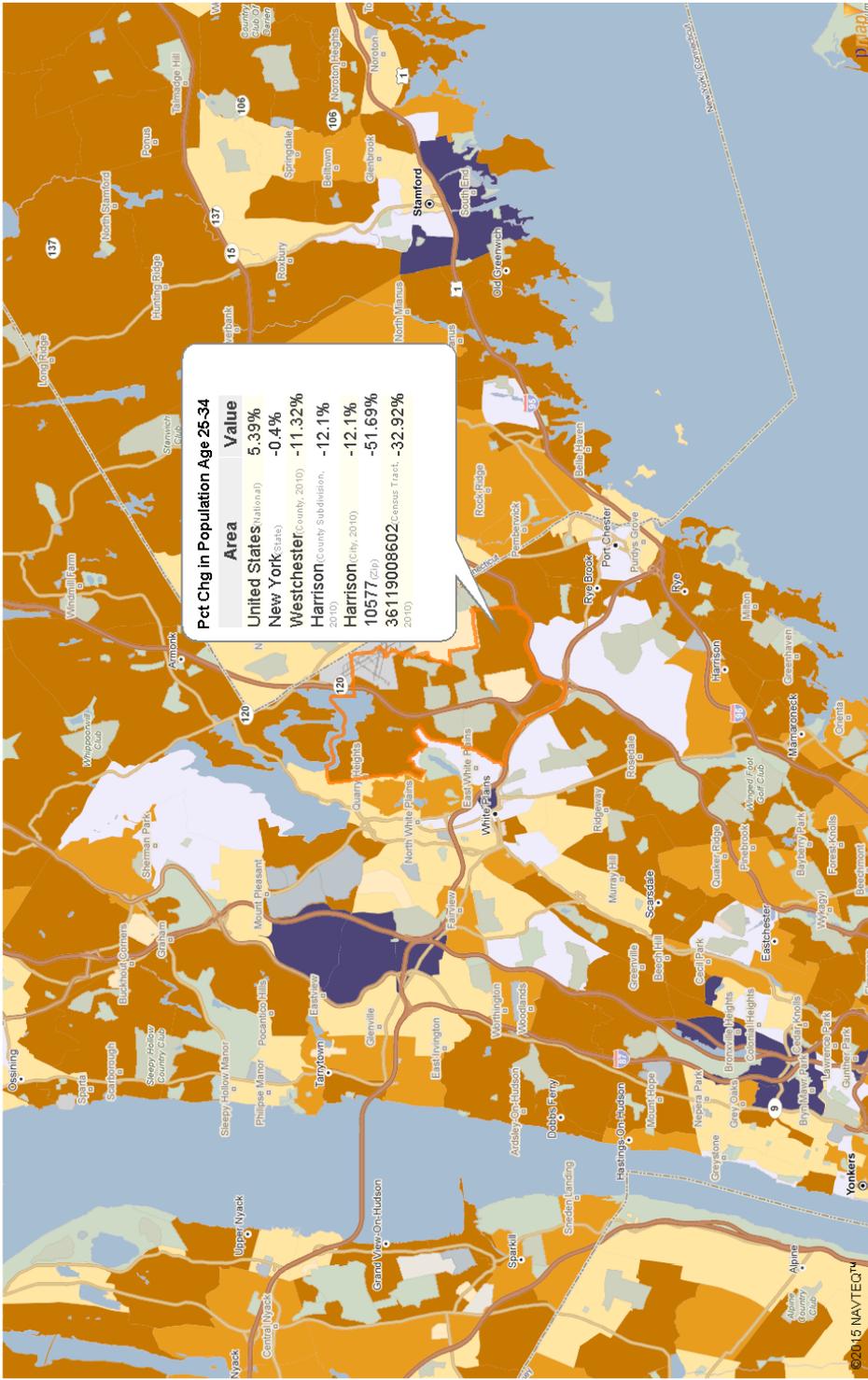
Source: Census



Map of Census Tract (36119008602, NY) with Estimated percent change in the number of people age 25 to 34 between 2000 and the period of 2009-2013.

Estimated percent change in the number of people age 25 to 34 between 2000 and the period of 2009-2013.

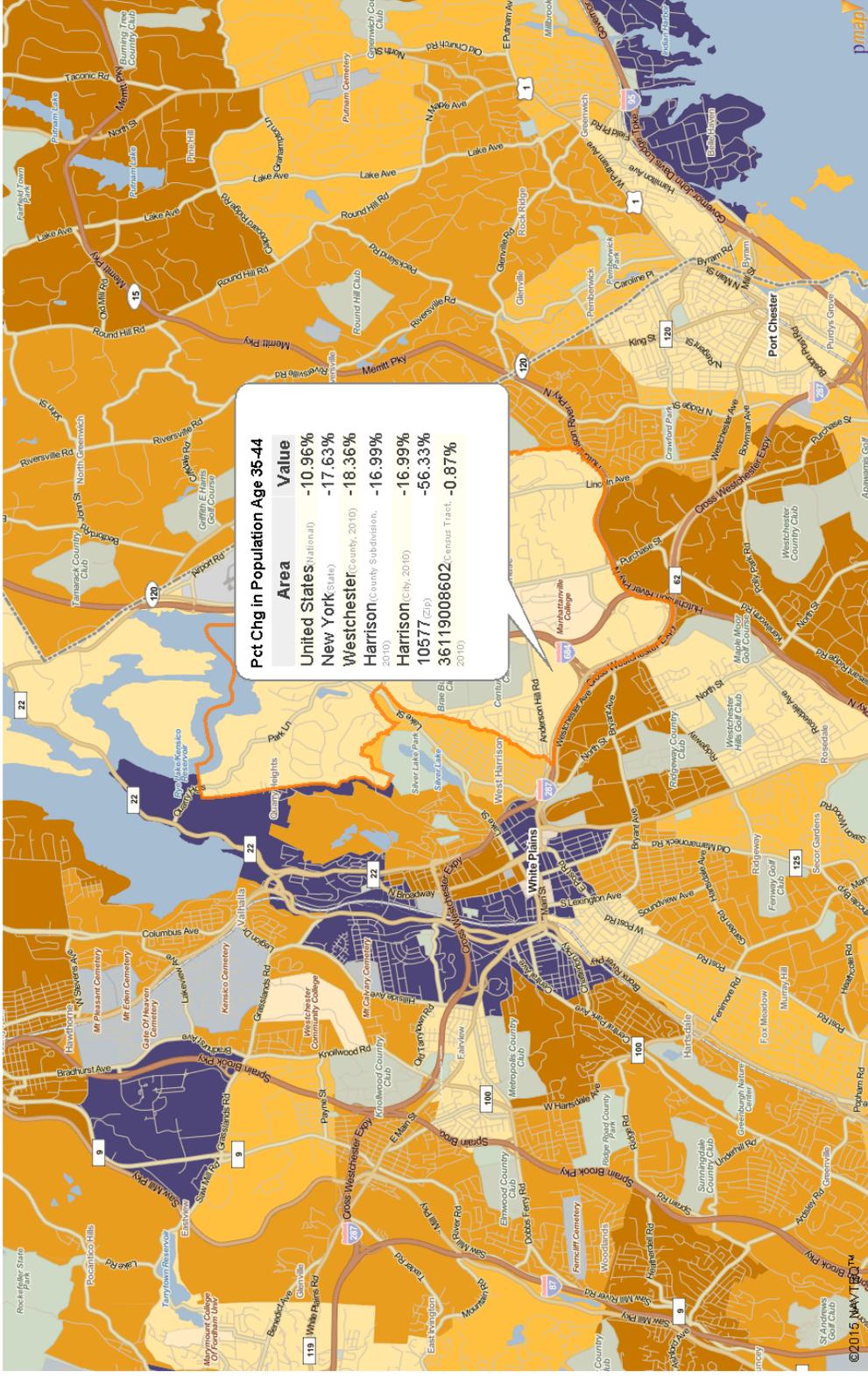
Estimated percent change in the count of the population age 25 to 34 years between 2000 and the period of 2009-2013. Percent change calculations showing change between two years were suppressed in cases where the population or household count in either year was less than 10. These areas are represented as having "insufficient data" in the map. These data are mapped to the 2010 Census boundaries. For percent changes, TRF created a bridge table between 2000 and 2010 geographies in order to calculate the 2000 data at 2010 Census boundaries. These 2000 data calculations are used for comparison to the 2010 data.



Map of Census Tract (36119008602, NY) with Estimated percent change in the number of people age 35 to 44 between 2000 and the period of 2009-2013.

Estimated percent change in the number of people age 35 to 44 between 2000 and the period of 2009-2013.

Estimated percent change in the count of the population age 35 to 44 years between 2000 and the period of 2009-2013. Percent change calculations showing change between two years were suppressed in cases where the population or household count in either year was less than 10. These areas are represented as having "Insufficient Data" in the map. These data are mapped to the 2010 Census boundaries. For percent changes, TRF created a bridge table between 2000 and 2010 geographies in order to calculate the 2000 data at 2010 Census boundaries. These 2000 data calculations are used for comparison to the 2010 data.



Legend

Year: 2013

Variable: %Ch

- Insufficient Data
- 35.56% or less
- 23.33%
- 11.26%
- 7.64% or more

Shaded by: Census Tract, 2010

Source: Census

Location Affordability Portal Version 2

Understanding the Combined Cost of Housing and Transportation



- HOME
- ABOUT
- MY TRANSPORTATION COST CALCULATOR
- LOCATION AFFORDABILITY INDEX
- VIGNETTES
- RESOURCES
- HELP

Location Affordability Index



SHARE

New York-Northern New Jersey-Long Island, NY-NJ-PA > Westchester County > Harrison

Harrison

Household Profile

Working Individual

\$32,896 annual income

1 person

1 commuter

Switch to this profile and location in [My Transportation Cost Calculator](#)

Average costs as a percent of income in this location for Working Individual Households:

- Renter
- Owner
- Combined

Housing	Transportation	=	Location Affordability
68%	22%	=	90%
\$22,369	\$7,237		\$29,606

On average, Working Individual Households in this location would:

Own **1.2** vehicles

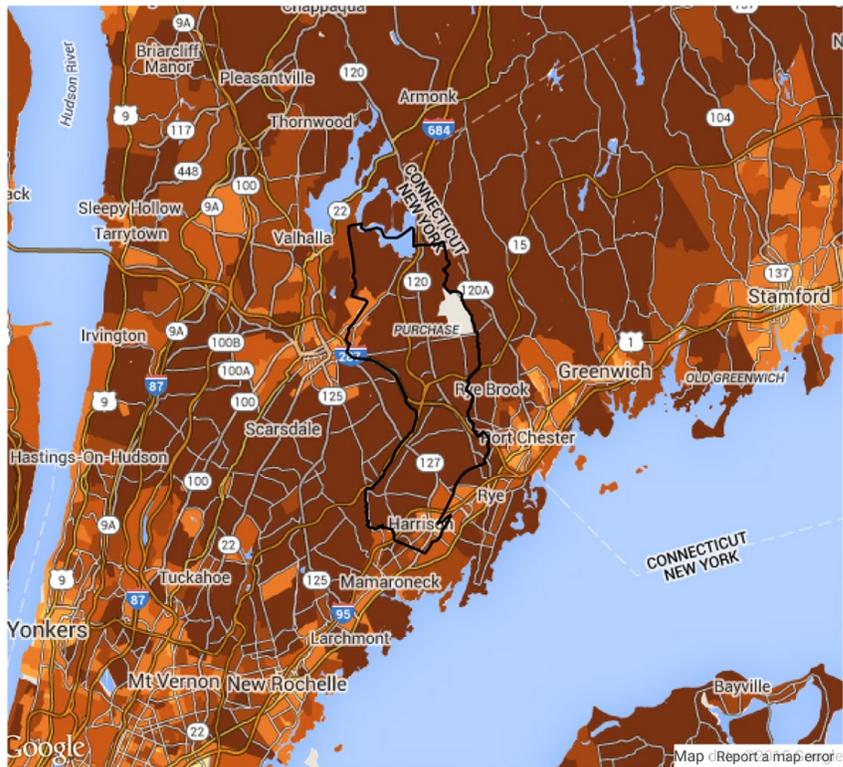
Drive **14,990** miles annually

Take **152** transit trips annually

Information on Map

Location Affordability (Housing and Transportation, % of Income) Working Individual Household

- 0%-26%
- 27%-37%
- 38%-44%
- 45%-52%
- 53%-61%
- 62%-71%
- 72%-87%
- 88%+



Your personal household information will not be stored after this page is closed.



Department of Transportation

ANDREW M. CUOMO
Governor

MATTHEW J. DRISCOLL
Commissioner

WILLIAM J. GORTON, P.E.
Regional Director

July 10, 2015

Mr. Thomas Heaslip, Chairman
Town of Harrison Planning Board
Town Hall, 1 Heinman Place
Harrison, New York 10528

**RE: NYSDOT SEQRA# 15-001
Corporate Park Drive Residencies
Town of Harrison, Westchester County**

Dear Mr. Heaslip:

We have received Draft Environmental Impact Statement along with Notice of Completion of DEIS from the Town of Harrison Planning Board for the referenced proposal, dated May 19, 2015 and received on May 26, 2015.

The referenced proposal is to replace existing 148,646 square foot of retail space by construction 421 residential apartments and 5400 square foot of restaurant facility. The Traffic Impact Statement prepared as part of DEIS indicates that the resultant impact on the existing highway system is minimal. We have no additional comments to offer at this time.

Thank you for your interest in highway safety.

Very truly yours,

Akhter A. Shareef
Senior Transportation Analyst

cc: Michael Sassi, Regional Traffic Engineering and Safety Group, R-8
Christopher Lee, Permit Field Engineer, Residency 8-9

Received @ the Meeting 7/23/15

Mr. Ted Demirjian
33 Century Ridge Road
Purchase, NY 10577
July 23, 2015

Town of Harrison Planning Board
1 Heineman Place
Harrison, NY 10528

RE: 103 – 105 Corporate Drive

Dear Planning Board Members:

As stated at the June 23, 2015 Planning Board Public Hearing regarding the proposed zoning change from commercial to residential for 103 – 105 Corporate Drive Purchase, NY, I am respectfully stating my OPPOSITION TO ALLOW THE ZONING CHANGE AND OPPOSE THE BUILDING OF THE PROPOSED 421 UNIT COMPLEX.

In addition to the concerns I raised and publicly stated, I also have the following concerns that were not stated at the June 23, 2015 Public Hearing:

Taxes:

- 1- In the DEIS report, the applicant has not stated the source of the numbers for the proposed tax revenue that will be possibly generated by the proposed project. How were these numbers derived and based on what source?
- 2- Has the applicant met and formulated a realistic tax number or are the numbers hypothetical and if so, how can the applicant claim the Town of Harrison and the Harrison Central School District will benefit from their proposed numbers
- 3- Has the applicant applied for or will apply for any tax deferments, credits, tax abatements that will either directly or indirectly alter their proposed tax numbers?

Infrastructure

- 1- In regards to electrical power, the applicant has not supplied any information for Con-Ed as to how the proposed building will be power 24/7. As it currently stands, the area at 103 – 105 is commercial, will Con-Ed reroute power from the existing Residential grid to this proposed building and if so, what will be the impact to existing homeowners.
- 2- On Sunday, 7/19/15, Con-Ed lowered the power to the resident in Purchase in order to keep up with the demands of the 1st heat wave. Adding more strain or demand on the existing fragile power grid will create tremendous power outage and/or electrical appliance damage to existing homeowners.

3- In regards to gas, where will the applicant tap into the gas main to feed all of the proposed 421 Units?

In summary, the applicant has glossed over very key and vital day to day operational issues that will directly impact the residents of Harrison, specially Purchase and the applicant needs to meet with the tax assessors and the power company to guarantte that existing residents will not be negatively impacted by the proposed building.

As the application currently stands, please do not allow the application to go forward with the change of commercial to residential to allow the proposed structure to be built, as it will negatively impact the existing residents of Purchase.

Respectfully,
Ted Demirjian