## **Workforce Housing Coalition**

c/o 75 South Broadway-Suite 340 White Plains, NY 10601 (914) 683-1010

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Tuesday, June 9, 2015

Ms. Rosemary Cusumano Secretary Town/Village of Harrison 1 Heineman Place Harrison, NY 10528

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

Dear Ms. Cusamano:

On January 21, at a scoping session for the above-referenced project, Jim Killoran of the Westchester Workforce Housing Coalition requested that affordable housing be considered in assessing the impacts of the proposed 421-unit development. After reading the DEIS, we note that the developer dismissed our request with only one reference to affordable housing in the entire 230 page report, "The Town of Harrison does not have a requirement for affordable housing, and there is none proposed here (all units are proposed to be market rate rentals)."

The lack of affordable housing in Harrison represents a legitimate subject for study in a town over two-thirds the size of Manhattan that has not produced one affordable apartment or condominium in 25 years. Harrison continues to display its contempt for working families by failing to promote housing for the more than 40% of households in Westchester County earning less than \$83,000 per year (80% of the Area Median Income), and up to half of the population of the region.

The town's attitude flouts federal and state law, including the Fair Housing Act and Berenson legal precedents, especially since Harrison ranks among the most egregious of the 31 municipalities in the federal discrimination Consent Decree with Westchester County, and especially given that the county's housing allocation plan fixed the town's fair share at 756 affordable units by the end of last year.

Echoing our concerns, the County Planning Board stated in a letter dated April 27 to the town, "Since we continue to recommend that the Town/Village take steps to incorporate the Model Ordinance Provisions into the Town/Village Code, we recommend that the Draft EIS include a discussion on how the development could potentially affirmatively further fair housing in Harrison."

As we have said before, the Coalition applauds the re-purposing of vacant office buildings to increase housing choice in Harrison. But an elemental appreciation of promotion of the public welfare and the promotion of diverse, inclusive communities dictates that you include affordable housing as a necessary element of any DEIS, and its omission may be grounds for future legal action.

We again urge the town to direct the developer to 1) include a study of the need for affordable housing in the DEIS and 2) adopt the county's Model Ordinance Provisions that specify reserving at least ten percent of the units for affordable housing.

## Sincerely,

Westchester Workforce Housing Coalition Alexander Roberts, Community Housing Innovations, Inc. James Killoran, Westchester Habitat for Humanity Lena Anderson, White Plains/Greenburgh **NAACP** Graciela Heymann, Westchester Hispanic Coalition Dennis Hanratty, Mount Vernon United Tenants and Hunger Action Network David Schwartz, Working Families Party Greg Maher, The Leviticus Fund Nada Khader, WESPAC Mara Winokur, ULI Westchester/Fairfield Andrea Kocsis, Human Development Services of Westchester Fr. Wilfred Tyrrell, S.A. Catholic Chaplain, Director-Duchesne Center/Manhattanville College Richard Hyman, Urban Planner Charles Pateman, Developer Timothy Lewis, Greenburgh Town Attorney