

**POTENTIAL IMPACTS OF THE TOWN OF EAST HAMPTON’S
RECOMMENDED FIFTY UNIT (100 BEDROOMS)
ROUTE 114 COMMUNITY HOUSING PROJECT ON
THE WAINSCOTT COMMON SCHOOL DISTRICT**

This Memorandum supplements the Memorandum dated February 15, 2023 (the “Initial Analysis”) prepared by the Board of Trustees of the Wainscott Common School District (the “Trustees”) analyzing the proposed Route 114 Community Housing Project (the “Project”) proposed to be built within the boundaries of the Wainscott Common School District (the “District”). The Initial Analysis is posted on the District’s website: <https://waincottschool.org/wp-content/uploads/2023/03/Impact-Statement-March-22-2023.pdf>.

Following the preparation of the Initial Analysis, the East Hampton Housing Authority Housing (the “Housing Authority”) provided the Trustees with student data from other affordable rental projects in the Town of East Hampton. A copy of that data is attached hereto (the “Estimated Data”).

The Trustees requested the Estimated Data at an earlier meeting between representatives of the Town and the Trustees. The Housing Authority proffered the Estimated Data to support their claim that the Project’s proposed fifty-unit (100 bedrooms) would yield an estimated thirty-five (35) children aged 0 to 18 years.¹

The Initial Analysis sets forth several reasons why the Trustees believe that the 35-student estimate severely understates the Project’s potential to generate school ages children (4-18). These include the fact that the Housing Authority’s 35-student estimate is clearly understated when compared to the District’s actual experience and what outside experts had predicted for a prior but smaller Town affordable housing project proposed by the Town on Stephen Hands Path in 2013.

The Estimated Data does not dispel the Trustee’s good faith concerns that the Housing Authority’s 35-student estimate is severely understated.

The Initial Analysis describes the significant adverse impacts upon the District’s existing facilities, educational programming and finances that will flow from any material understatement in the number of school aged children living at the Project. These include the possibility of cutting one or more of its grade levels; building a new full format school at a new location; or becoming an “administrative district” where all students become tuition students sent to other school districts. Each of these options comes with significant increased costs to be paid by the District’s taxpayers as set for the more fully in the Initial Analysis.

¹ The Town appointed Route 114 Working Group claims their recommended 50 unit/100 aggregate bedroom proposal will generate an “estimated 35 children aged 0 to 18 years”. They immediately hedge their estimate by saying that “[f]or planning purposes we recommend utilizing 39 students aged 0 to 18 years (+10%)”.

**UNASSAILABLE CONCLUSIONS DRAWN FROM THE
ESTIMATED DATA AND DISCUSSIONS WITH THE TOWN**

The following unassailable conclusions drawn from the Estimated Data or based upon the Trustees' discussions with the Town support the Trustees' good faith concern that the Town's 35-student estimate is severely understated.

1. The number of school aged students in any project is driven by the number of secondary bedrooms.²
2. Housing Authority rules require that every bedroom has at least one and not more than two occupants. When applied to the Project that would mean a minimum of fifty (50) or a maximum of one hundred (100) occupants in the proposed 50 secondary bedrooms.
3. The Project proposes the largest number of housing units – fifty (50)- at any Town or Housing Authority affordable or community housing project. Only one other project has 50 units- Accabonic (opened in 1999). However, the Accabonac project has 38 or thirty two percent (32 %) fewer secondary bedrooms than the proposed Project.
4. The Project proposes the largest number of secondary bedrooms- fifty (50)- in any Town or Authority affordable or community housing project.
5. The Project proposes the largest number of 3- bedroom housing units -sixteen (16) having thirty-two (32) secondary bedrooms.
6. The Project proposes the largest number of 2- bedroom housing units -eighteen (18) having eighteen (18) secondary bedrooms.
7. The number of students living in a housing project are the highest at its opening and decreases over time.³

**THE TOWN IS PROPOSING THE LARGEST AFFORDABLE HOUSING
PROJECT IN ITS SMALLEST HAMLET WITH THE LEAST CAPACITY
TO ABSORB NEW STUDENTS**

Based upon the above, there is no doubt that the Project is the largest affordable or community housing project ever built or proposed by the Town when measured by the most impactful metrics: the number of total units and the number of secondary bedrooms.

As clearly proved in the Initial Analysis, there is also no doubt that Wainscott has the smallest year-round population in the Town and that the Wainscott School has the least capacity

² The Estimated Data includes the following statement: "Generally the number of children attending the local school districts correlates to the number of secondary bedrooms."

³ This conclusion was stated by the Town in our first meeting and is confirmed by the Existing Data. For example, the Accabonic Project opened in 1999 had 44 students in 12/15 and has 31 students currently. The Springs Fireplace Project (the project most comparable to the Project as discussed below) opened in 2008 had 14 students in 12/15 and currently has 7 students. For the purposes of this Memorandum the front-end loaded numbers of students are referred to as "Student Runoff".

to absorb new students than any other school in the Town. Therefore, it is indisputable that the scale of the Project as proposed has the real potential to inflict unreasonable and disproportionate impacts on the Wainscott community⁴ and the District's existing facilities, educational programming, and finances.

THE MOST COMPARABLE PROJECT

The Housing Authority bases its 35-student estimate upon the number of current students in certain of the existing affordable rental projects they manage.

The Estimated Data lists eight "AFFORDABLE RENTAL APARTMENTS IN THE TOWN OF EAST HAMPTON." They vary in date opened, age restrictions, income restrictions, total number of units and secondary bedrooms. Each of these metrics affects the number of school children that live in each project.

The Project as proposed does not have age restrictions other than the age of the head of household must be 18 or older. The Project has an Income Restriction of equal or less than 130 % of AMI (Middle-Income).⁵

Three of the existing affordable rental apartments have an Age Restriction of minimum age 62; have no secondary bedrooms and have Income Restrictions equal or less than 30 % or 40 % of AMI (Extremely Low-Income). These three projects are Windmill Village (opened in 1987); Windmill II (opened in 2022) and Saint Michael's (opened in 2021). It is inappropriate to use these three projects as comparable properties to the Project due to their Age Restrictions, Income Restrictions, and absence of secondary bedrooms.

It is also inappropriate to use Whalebone Village (opened 1989); Avalone (opened in 1993); Accabonac (opened 1999) and Gansett Meadow (open in 2020) as comparable properties to the Project due to their more restrictive Income Restrictions.⁶

Springs Fireplace (opened in 2008) is the only suitable comparable since it has the same Income Restriction as the Project, namely, equal or less than 130% of AMI (Middle Income). It also does not have any Age Restrictions. Springs Fireplace is much smaller than the Project. It has 26 units (as compared to the Project's proposed 50 units). Springs Fireplace has 13 one-bedroom units and 13 two -bedroom units, which yields 13 secondary bedrooms (as compared to the Project's proposed 50 secondary bedrooms).

⁴ The United States Census Bureau's 2020 census determined there are 342 year-round Wainscott residents living in 169 households. The 211 total occupants estimated by the Town to be generated by the proposed Project would increase Wainscott's year-round population from 342 to 553 people; being a **sixty-two percent (62%)** increase in Wainscott's year-round population.

⁵ "AMI" equals "Area Medium Income" and is defined for regions across the county by the United States Department of Housing and Urban Development as the midpoint of a region's income distribution. Half of families in a region earn more than the medium and half earn less than the medium.

⁶ Whalebone Village's AMI is equal or less than 30 % of AMI (Extremely Low- Income); Avalone's AMI is equal or less than 50 % of AMI (Very Low- Income); Acetone's AMI is equal to or less than 30 % of AMI (Extremely Low- Income); and Gansett Meadow's AMI is equal to or less than 90 % of AMI (Moderate Income).

The Estimated Data does not include the number of students who lived in Springs Fireplace when it opened in 2008. It does state there were 14 students in 12/15 and 7 students currently. Those numbers equate to 1:1.1 ratio of students to secondary bedrooms even without giving effect to the seven years Student Runoff period between 2008-2015 (the first 7-year period of its occupancy). The next 7-year Student Runoff Period (2016-present) shows a reduction in students from 14 to 7 (a 50 %) reduction. Assuming the same rate of Student Runoff from 2008 to 2015, the ratio of secondary bedrooms to students would increase to 1:1.7 (21 students in 13 secondary bedrooms).

Those same ratios applied to the Project would produce 55 students at a minimum ($50 \times 1:1.1=55$ students) and 85 (adjusted for student runoff for the entire period: $50 \times 1:1.7=85$ students). A total of 55 students would understate the 35-student estimate by fifty-seven percent (57 %). A total of 85 students would understate the 35-student estimate by two-hundred forty two percent (142%).

Therefore, the most useful and proper comparable project clearly shows that the 35-student estimated proffered by the Housing Authority is severely understated.

THE HOUSING AUTHORITY'S 35 STUDENT ESTIMATE IS BASED ON A BLENDED RATIO CALCULATED BY USING INAPPROPRIATE COMPARABLES

The Housing Authority's claim that 50 proposed secondary bedrooms for the Project will yield 35 children ages 0-18 is severely understated since it is based upon a 1:7 ratio of secondary bedrooms to students. Specifically, the 1:7 ratio applied by the Housing Authority is a blended rate based upon **current student** yields at Accabonac; Springs Fireplace; and Gansett Meadow. As shown above, Accabonac and Gansett Meadow are not proper comparable projects due to different Income Restrictions.

Moreover, Accabonac was opened 24 years ago. Therefore, its current student yield does not account for Student Runoff over that quarter century period.

CONCLUSION

The Trustees' analysis of the Estimated Data clearly shows the Town's 35 student estimate is severely understated.

In any event, the 35-student estimate is just that. The Town has not offered to cap the number of children living at the Project. Therefore, the entire risk of an understated estimate is shifted to the District and its taxpayers with no recourse to the District or its taxpayers or consequence to the Town of the Housing Authority in their estimate is understated.

The very real prospect of the significant adverse impacts upon the Wainscott community, and the District should force the town to reconsider the Project's disproportionate impact on the Hamlet, the District, and its taxpayers.

The Town needs to design the project by reducing the number of secondary bedrooms to no more than 35. Minimally, that structure will produce 39 students (35 x 1:1.1). That is the maximum number of students that the District can accommodate without incurring the severe and disproportionate impacts on its facilities, educational programming and finances discussed in the Initial Analysis.

The Town can also place age restrictions on certain of the units which will also reduce the number of potential students.

In any event, it is indisputable that the scale of the Project as proposed has the real potential to inflict unreasonable and disproportionate impacts on the Wainscott community and the District's existing facilities, educational programming, and finances.

Dated: April 23, 2023

THE TRUSTEES OF THE WAINSCOTT
COMMON SCHOOL DISTRICT

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