

SISTERS OF CHARITY  
HOUSING DEVELOPMENT  
CORPORATION



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November 8, 2018

Hon. Kathleen H. Burgess  
Secretary to the Commission  
New York Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350

**Re: Application of Vincent's Village Associates, LLC, for a waiver of Paragraph D of Section 3.4, Leaf 20, of the Tariff of United Water New York Inc. — Vincent's Village Associates — Convent Lane, Nanuet, Town of Clarkstown, Rockland County, New York**

Dear Secretary Burgess:

We are writing to you behalf of the Sisters of Charity Housing Development Corporation ("SOCHDC") and Vincent's Village Associates, LLC, to respectfully request a waiver of Paragraph D of Section 3.4, Leaf 20, of the Tariff of United Water New York Inc. ("UWNY"). Paragraph D of Section 3.4, Leaf 20, provides:

Notwithstanding any provision of paragraph 3.4, each individual dwelling unit within any apartment, co-operative or condominium development, or any expansion thereof, construction of which shall have commenced after April 15, 1991, shall be separately metered for water service.

SOCHDC is a 501(c)(3) not-for-profit corporation based in Nanuet, Rockland County, New York, with a mission to provide affordable and supportive housing to low income New Yorkers. One hundred percent (100%) of the units within SOCHDC's portfolio are affordable, serving the elderly and special needs populations. Vincent's Village Associates, LLC is a limited liability corporation and the Project Sponsor. Together, SOCHDC and Vincent's Village Associates, LLC are developing Vincent's Village (hereinafter "Vincent's Village" or the "Project"), a low-income senior rental complex on Convent Road, Nanuet, Town of Clarkstown, Rockland County, New York. Vincent's Village will consist of a total of three two story buildings and two one-story buildings, containing an aggregate of 81 one bedroom units and 12 two bedroom units.

Vincent's Village will receive both operating funding and capital funding through the State of New York. New York State Homes and Community Renewal ("NYSHCR") will provide approximately 81% of the funding for Vincent's Village through its Affordable Rental Housing Program which provides Low Income Housing Tax Credits, tax exempt bond financing program and subsidy through the Supportive Housing Opportunities Program. As a condition of this special financing, Vincent's Village Associates, LLC will enter into a forty-year (40) agreement with NYSHCR to

ensure that the rents are maintained at or below sixty percent (60%) of the Rockland County's Metropolitan Statistical Area ("MSA") Household Income. The units will be available for rent to income qualified senior citizens of Rockland County. The completed project will be managed by the SOCHDC, which currently has a waiting list of approximately 300 qualified applicants for this type of housing, which represents only a portion of the identified need in the Town. Vincent's

Village has also received operating funding through the Empire State Supportive Housing Initiative ("ESSHI"). The ESSHI funds will provide money for social service staff for Vincent's Village. The ESSHI funded units will provide supportive housing to Thirty-five (35) frail and disabled seniors over the age of 55. These individuals will be low income seniors who are homeless or at risk of homelessness and while many suffer some combination of age-related sensory, mobility and cognitive impairments that make independent living more hazardous, they are not in need of 24-hour nursing home care. An additional 10 units will be set aside for survivors of domestic violence. Domestic violence is the leading cause of homelessness among women in the United States, with the lack of affordable housing providing a significant barrier for survivors. Through creating affordable housing with case management and care coordination services, the Project will fulfill two key needs identified by the Rockland County Department of Health in their Community Needs Assessment. The Project's 48 non-ESSHI units will be for seniors ages 55 and older who earn below 60% of the area median income for Rockland County.

There will be 81 one bedroom units and 12 two bedroom units at Vincent's Village. Each of the one bedroom rental units at Vincent's Village will be approximately 600 square feet while each of the two bedroom units will be approximately 800 square feet. All of the units will have one bathroom. As a condition of the NYS HCR financing, each bathroom and kitchen fixture will be low-flow in order to conserve water (showerheads - 2.2 GPM or better; bathroom faucets - 2.0 GPM or better; and kitchen faucets - 2.2 GPM or better). Given the uniform size of the units, as well as the requirement to use low-flow fixtures, water consumption is expected to be fairly uniform from unit to unit. In addition, each unit will be equipped with U.S. EPA Energy Star appliances, heating units, and light fixtures in order to save energy.

As discussed above, as a condition of financing, Vincent's Village Associates, LLC, will be executing an agreement with NYSHCR that will guarantee that the units will be used for low-income senior housing for at least the next 40 years. We understand and accept that the New York State Public Service Commission may condition its waiver of the individual meter requirement upon the continued use of the units for low-income senior housing.

Vincent's Village is an important project for SOCHDC, the Town of Clarkstown, and the County of Rockland. *Project Tomorrow: Aging in Place*, which was commissioned by the Rockland County Legislature, indicates that Rockland's "senior population is growing at a rate that far outpaces both New York State and national averages. Between 1990 and 2000, Rockland experienced a 26% increase in its population of residents aged 65 and older, the highest rate of growth in any county of New York State. At the same time, the total population of the County grew only by 8%. By comparison, the average growth of 65+ population in New York grew only by 4% during the time period. The national increase of those 65+ during the time period was 12%." **Based on these statistics, Rockland County's senior population is 153% higher than the 65+**

**population for New York State and 46% higher than the national average.** The aging of Rockland's population has continued this decade. According to the Rockland County Department of Aging, there are currently over 65,000 people over the age of 60 in Rockland County, which represents over 20% of the County's total population. This decade, the percentage of seniors in Rockland has increased by 36%, a trend that is expected to continue for the next 5 years.

Vincent's Village is scheduled to start construction in February 2019 and to be completed in 2020. The Project's construction will provide hundreds of individuals with temporary jobs in the construction industry. Upon completion, seven permanent jobs will be created to operate and maintain the building, and to provide services to the residents. Vincent's Village Associates, LLC will also continue to hire local vendors to ensure that the property is properly maintained. Finally, local stores situated within walking/driving distance will benefit from the business that will be generated from Vincent's Village residents.

We thank the Commission for its consideration of this waiver request and respectfully request an expedited ruling.

We have attached hereto letters in support of this waiver request from the Town of Clarkstown Supervisor George Hoehmann and from Suez Water New York for the Commission's consideration.

Please do not hesitate to contact me at (845) 624-0803 if any additional information is required.



Sister Donna Dodge  
Executive Director  
Sisters of Charity Housing  
Development Corporation



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West Nyack, New York 10801  
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October 29, 2018

Hon. Kathleen H. Burgess  
Secretary to the Commission  
New York Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350

Re: **Application of Vincent's Village Associates, LLC, for a waiver of Paragraph D of Section 3.4, Leaf 20, of the Tariff of United Water New York Inc. - Vincent's Village Associates -Convent Lane, Nanuet, Town of Clarkstown, Rockland County, New York**

Dear Secretary Burgess:

On behalf of Suez Water New York Inc. ("SWNY"), please accept this letter in support of the request of the Sisters of Charity Housing Development Corporation ("SOCHDC") and Vincent's Village Associates, LLC ("Vincent's Village") for a waiver of Paragraph D of Section 3.4, Leaf 20, of the SWNY Tariff, which requires separate metering for water service for each individual unit at the Vincent's Village affordable senior rental complex in the Town of Clarkstown.

SWNY supports the New York State Public Service Commission's individual meter requirement as an important tool to promote conservation and agrees that waivers should only be granted in certain instances. SWNY submits, that given the new construction of the senior rental complex and the use of water conserving fixtures, the Vincent's Village affordable senior rental complex is a prime example of such a circumstance.

As SOCHDC set forth in the waiver application, the Vincent's Village project is a needed low-income senior housing project that will benefit the citizens of Rockland County. My understanding is each of the one bedroom rental units at Vincent's Village will be approximately 600 square feet, and each of the two bedroom units will be approximately 800 square feet. All of the units have one bathroom in which low-flow water consumption fixtures have been installed. These low-flow fixtures will help ensure that water usage remains low and consistent in each unit. In addition, the Vincent's Village project is a welcome and needed addition to the local community, economy and future residents of the complex.



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For the foregoing reasons, SWNY fully supports the Vincent's Village application for a waiver of the individual metering requirement as warranted and appropriate in these circumstances. SWNY respectfully requests that the waiver application be granted.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher J. Graziano".

Christopher J. Graziano  
Vice President & General Manager



# TOWN OF CLARKSTOWN

GEORGE HOEHMANN  
SUPERVISOR

November 7, 2018

Hon. Kathleen H. Burgess  
Secretary to the Commission  
New York Public Service Commission  
Three Empire State Plaza  
Albany, NY 12223-1350

*Re: Application of Vincent's Village Associates, LLC for a waiver of Paragraph D of Section 3.4 Leaf 20, of the Tariff of United Water New York, Inc. – Vincent's Village Associates – Convent Lane, Nanuet, Town of Clarkstown, Rockland County, New York*

Dear Secretary Burgess:

On behalf of the Town of Clarkstown, I support the request of the Sisters of charity Housing Development Corporation ("SOCHDC") and Vincent's Village Associates, LLC for a waiver of Paragraph D of Section 3.4, Leaf 20, of the Tariff of United Water New York, Inc. ("UWNY") which requires the installation of individual water meters at the Vincent's Village affordable senior rental complex in the Town of Clarkstown. SOCHDC is a 501 (c) (3) not-for-profit corporation based in Nanuet, Rockland County, New York with a mission to provide affordable and supportive housing to low income New Yorkers. One hundred percent (100%) of the units within SOCHDC's portfolio are affordable, serving the elderly and special needs populations. Vincent's Village Associates, LLC are developing Vincent's Village (hereinafter "Vincent's Village" or the "Project"), a low-income senior rental complex on Convent Road, Nanuet, Town of Clarkstown, , Rockland County, New York, Vincent's Village will consist of a total of three two story buildings and two one-story buildings, containing an aggregate of 81 one bedroom units and 12 two bedroom units.

The Town of Clarkstown conducted a housing study in connection with its Comprehensive Plan that identified a great need for affordable senior housing in our high cost area. Vincent's Village is a high-priority project for the Town. Indeed, the Town and SOCHDC have worked closely together in proceeded through the Town approval process.

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The units are relatively small (approximately 600 square feet for the one bedroom units and 800 square feet for the two bedroom units), and have one bathroom, which will be equipped with low flow fixtures. Given the size of the units, the demographics of the occupants, and the occupancy restrictions, I anticipate that water consumption will be relatively uniform throughout the complex.

Construction is expected to begin in February, 2019. Given the low income and elderly population that will be served at Vincent's Village, we feel that it would be unduly burdensome to require individual metering devices for this Project. Therefore, I strongly urge the Public Service Commission to grant the developer's request for a waiver.

Sincerely,

A handwritten signature in black ink that reads "George Hoehmann". The signature is written in a cursive style with a long, sweeping tail on the final letter.

George Hoehmann  
Supervisor