
Subject:

FW: Comments on SEQRA DOCUMENTS FOR PROPOSED 507-ACRE ANNEXATION to VILLAGE OF KIRYAS JOEL

From: MICHAEL G KROPOSKI [<mailto:mkroposki@sbcglobal.net>]

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To: tmiller@timmlerassociates.com

Subject: Comments on SEQRA DOCUMENTS FOR PROPOSED 507-ACRE ANNEXATION to VILLAGE OF KIRYAS JOEL

The draft shows almost no negative impacts by assuming up front that there will be the same population growth with or without annexation. This is just not so. If the regions bordering KJ cannot accommodate large fast growth it would not take place. Secondly it misses the real issues " Is the annexation area suitable for high density growth and is it ECONOMICALLY feasible.

6 NYCRR 617.1 Provides :

(d) It was the intention of the Legislature that the protection and enhancement of the environment, human and community resources should be given appropriate weight with **social and economic** considerations in determining public policy, and that those factors be **considered together** in reaching decisions on proposed activities. Accordingly, it is the intention of this Part that a suitable balance of **social, economic and environmental** factors be incorporated into the planning and decision-making processes of state, regional and local agencies. **It is not the intention of SEQR that environmental factors be the sole consideration in decision-making.**

The Kiryas Joel (KJ) land annexation Petitions present a complex interplay of economic, social and environmental issues. The primary one is whether KJ is presently an economically viable municipality and whether the expansion of it results in an economically viable entity.

The annexation area is rather hilly and uneven making high density development difficult and more expensive. With reports that KJ has the lowest per capita income in the County, can they realistically afford such high cost development. If they cannot annexation will lead to a economic disaster in terms of a functioning municipal government.

One example of the unaddressed economic issues is the need for adequate access roads. It appears that the annexation area will lead to expanded use of access on Forrest Avenue, a Monroe Village street which was not designed for use as a major access way. Who will pay for upgrading expanded access for the high density development in the annexation area?(If it is even feasible). Certainly not the Village of Monroe! This is a real impact which is not addressed in the draft SEQUA. This should have been at least mentioned in the Cumulative Impacts section but it is not.

The Fiscal chapter in the draft is curiously devoid of most financial information concerning the projected costs of the annexation. With annexation it shows a KJ tax revenue surplus of about \$2,379,758 but does not indicate the specific projected cost of providing streets, water, sewers etc to the annexation area. The draft uses a figure of \$70 per capita but does not provide any backup information to support the reasonableness of this figure. The whole issue of the additional costs of high density development is not addressed. There is almost no economic data for KJ in the draft while at the same time complete budgets for the Town of Monroe and the MW School District are included!

There is a short reference to the KJ village budget that states the village tax revenue is 25.9% of the whole budget. Sales tax is said to contribute 37% and user fees 20.3%. There is no explanation as to the source of the remaining 16.9% assuming that the KJ Village presently has a balanced budget!

Although, as is pointed out above, assessing the economics of the environmental impacts of the annexation are a central issue under the statute and regulations, this draft simply avoids the whole issue. If the economic resources are not adequate to fund the expansion of the KJ Village, to go forward with the annexation is a bad decision for environmental protection.

Respectfully submitted,
Michael Kroposki