Today's hearing is clearly of interest to ALL of Orange County. I am given three minutes to speak, but our comments tonight are supplemented in writing and will be further added to relative to the DGEIS by June 22. While I am here as the County Executive today, I grew up in Monroe, graduated from Monroe-Woodbury, have served as a volunteer firefighter in this Town, and have family who live here.

The fundamental question asked in every annexation is as follows:

Whether "it is in the overall public interest to approve such proposed annexation"?

The question is of "public interest."

As the **Chief Executive Officer** of Orange County though, let <u>me</u> answer it clearly: Granting these annexation Petitions IS NOT in the overall public interest. Period.

The short answer having been stated, let's get to the substance.

The county believes that there will be fiscal and administrative impacts on the services it provides, and that those impacts will be contrary to the public interest. These comments provide a broad overview of those potential impacts, and the county will be supplementing the record with data and/or factual information related to these issues on or before June 22nd.

I note for the record that I have been receiving negative comments from an official from the Village of Kiryas Joel and from Monroe about the County 's decision to complete this analysis. I respectfully must disagree. This is County business. I assume those complaints are intended to set up litigation by Kiryas Joel against the County. The fact is Kiryas Joel is already in litigation with the County. For the record though, were a massive annexation which has the potential to dramatically facilitate growth that also has <u>overwhelming opposition</u> from many others in the impacted community ever to be proposed elsewhere, I would push for this same type of County review. This is about the <u>overall public</u> interest.

Our initial written comments are attached. These comments include the following concerns:

- 1. Errors and inconsistencies of the descriptions of the Annexation territory.
- 2. The concerns that the Petition may impact County parkland.
- 3. Anticipated growth.
- 4. Social Services Costs.
- 5. Impact on Early Intervention and School District costs.
- 6. Impact on public health monitoring.
- 7. Impact on emergency services and loss of tax base to the fire district that presently covers the area proposed to be annexed.
- 8. The flawed nature of the traffic study.
- 9. The inconsistent use of varying demographic measurement methodologies.
- 10. The unnecessarily limited population projection timeframe utilized in the DGFIS



- 11. The errors in wetland impacts.
- 12. Wastewater impacts and impacts on the Ramapo River.

Those preliminary comments are provided tonight in greater detail than I have just presented, and are now on the County website – www.OrangeCountyGov.com. I have directed the County Planning Department to provide additional written comments to the Village on the DGEIS prior to the close of business June 22, 2015.

The <u>question</u> before your Boards is whether the proposed annexations are in the overall public interest. The <u>answer</u> is "no". Thank you.

SUPPLEMENTAL WRITTEN COMMENTS ON BEHALF OF THE COUNTY OF ORANGE

By: Steve Neuhaus, Orange County Executive

The County of Orange hereby supplements the oral comments made by the County Executive today, June 10, 2015 consistent with the Village of Kiryas Joel Notice of General Municipal Law Article 17 Joint Public Hearing on two, overlapping Petitions for Annexation of Territory in the Town of Monroe to the Village of Kiryas Joel, dated May 1, 2015. Our comments also apply to the Village of Kiryas Joel, Village Board Resolution, dated May 1, 2015 setting a public hearing of June 10, 2015 and written comment period through June 22, 2015 on the Draft Generic Environmental Impact Statement (DGEIS) for the same two (2) Petitions for Annexation – one referred to as a proposed 507-acre Annexation and the second referred to as a 164-acre Annexation. The oral comments, as prepared for delivery, are attached hereto and made a part hereof.

County comments were prepared based on interviews with a range of interested parties as well as research conducted by a team of County senior staff from key agencies led by the County Planning Commissioner, David Church, AICP and assisted by a professional consultation team led by the Center for Governmental Research (CGR). County comments seek to assist in defining what is in the overall public interest for all constituents within the County.

Our comments today address a set of key documents that are the subject of the June 10, 2015 Public Hearing. First, County

comments are directed at the Petitions for Annexation. Second, the County today provides preliminary comments on the DGEIS and will provide more detailed, written comments on the DGEIS on or before close of business June 22, 2015.

Petitions for Annexation

Both Petitions for Annexation contain multiple errors and inconsistencies in identifying tax parcels within the "annexation territory" (see Attachment A; List of Parcel Errors on Petition for Annexation). Consistent identification of unique tax parcels is needed throughout the petition document and with the three (3) exhibit attachments, each of which currently draws upon a different source of tax parcel data and identifiers. Furthermore, there is a high likelihood that these discrepancies may have led to inadequate or insufficient public notice regarding the petition and/or inclusion in the affected areas, which is not in the public interest of those affected. The document must be revised so that only one identifier (SBL) is used to identify each tax parcel proposed for annexation throughout this petition.

For example, the proposed 507 acre Petition document includes tax parcel 43-3-1 with four (4) owner signatures, lists tax parcel 43-3-1 within the description of Area I in Exhibit A, yet provides the 2013 assessment value for three (3) other tax parcels (59-2-1.-1, -2 & -3) within Exhibit C. The true tax lot identifiers for these parcels are 59-2-1.-1, 59-2-1.-2, & 59-2-1.-3. In a second example, an owner signature is provided for both tax parcels 43-5-10 & 43-5-11, and the 2013 assessment value for both tax parcels is provided within Exhibit C; however, neither parcel is listed within the description of Area VIII in Exhibit A. A list of the errors we have been able to identify is annexed hereto as Exhibit "A". We cannot be certain this list is complete.

The County notes that the Petition for Annexation referred to as the proposed 507 acres Annexation includes the following parcel owned by the County of Orange and operated as parkland - Town of Monroe SBL: 1-1-5, 7.0 acres. The inclusion of County Parkland within the petition for annexation of territory remains a matter of concern and has the potential to cause several adverse impacts that would not be in the public interest. First, while the Petition was filed at the conclusion of the last Administration, no public notice has been located stating that a County-owned parcel, specifically SBL 1-1-5, was being included within and as part of the petition for annexation of territory. This 7-acre parcel constitutes a portion of a significant County park facility known as Gonzaga Park, and also accommodates the routes of the Highlands Trail and Long Path – two regionally-significant hiking trails. Any future impacts to the park as a result of

annexation into the Village of Kiryas Joel must be evaluated within the context of the anticipated scale and intensity of development that will likely occur at neighboring properties, as well as an increase of patronage from nearby Village residents and additional needs for particular amenities or services. Preservation of the aforementioned hiking trails must also be ensured in the future, as such trails are characterized by undeveloped, natural landscapes and dramatic scenic views of Orange County; as such, any new development on the annexation territory will have the potential to negatively impact the natural qualities of these regionally-significant hiking trails.

As such we express concern about the lack of documentation on the public interest and potential impacts of including such lands, without our agreement, on operations of this parkland including issues of public access. Until this is satisfactorily addressed, we cannot support inclusion of these lands in any Annexation.

Additional Comments on Petitions for Annexation.

The County of Orange, after review of NYS General Municipal Law §711 and in its capacity as the elected representatives of all county residents, is further obliged to provide additional comments on whether, in the words of the statute, "it is in the overall public interest to approve such proposed annexation."

The county's position stated above is based on the following assumptions concerning the annexation:

The stated purpose of the annexation is to accommodate an expansion of the population of the Village of Kiryas Joel, as the capacity of the Village to add additional housing units within its current confines is constrained.

The immediate and predictable outcome of the annexation is to replicate the land use pattern now in place in the Village in the annexed lands.

Approval of the annexation will have the effect of increasing the number of housing units within the 507 acres under consideration and increasing the population Moreover, the Petition, in our view, is based on an assumption that identical growth will occur with or without the annexation. If that is true, could not that identical growth happen by an even greater amount with the annexation. Put more simply, if the Village will grow vertically if not permitted to grow horizontally, what is to stop the grown from being vertical AND horizontal if horizontal growth is permitted.

Calculated on a *per capita* basis, a large proportion (61%) of the current population of Kiryas Joel is estimated to have income below the federal poverty line, thus is eligible for an array of social services, including Medicaid, Supplemental Nutrition Assistance Program (SNAP), Home Energy Assistance Program (HEAP) and others. These programs are funded by local, state and federal taxpayers. All other things being equal, an increase in the proportion of the total population eligible for





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services will increase the burden on the general taxpayer, and the county should expect to see a net spending increase. We will provide a detailed estimate of this increase in our comments to be submitted by June 22.

Cost impacts, by county department or school district Department of Health

Early intervention evaluations and services

Both program and administrative costs for early intervention evaluations and services (EIS) for birth-three and pre-K are likely to increase as the total population rises.

In addition, to the extent that children whose parents live elsewhere reside with extended family in Kiryas Joel, Early Intervention Costs rise. It would be helpful to quantify whether that is occurring.

Environmental health: The number of facilities for which the environmental health division is responsible (i.e., school and daycare food services; summer camps; food service establishments; and swimming pools) is likely to increase with an increase in total population.

Public health services and programs: The increase in population will increase the cost of monitoring and planning for immunization and infectious disease prevention and control services, particularly as they pertain to high-density housing.

Social Services

Medicaid: The total cost to NYS and the federal government of providing Medicaid services will rise with the anticipated increase in the number of residents qualifying for Medicaid services. New York State has presently capped Orange County's share of program costs and is reducing its share of administrative costs. The increase in population is likely to have little or no impact on the Orange County Government's Medicaid burden if County Medicaid costs remain capped. If that changes, however, County costs could increase significantly.

Supplemental Nutrition Assistance Program (SNAP): Fully federally funded, the increase in spending on SNAP that may occur as a result of this increase in population will not increase the cost to Orange County taxpayers.

Department of Mental Health: Although a significant portion of the DMH's budget is funded by Orange County, it does not appear that the Kiryas Joel community members access those services. Therefore, little to no cost increases are expected.

Emergency Services

Emergency Medical Services: The proposed annexation will have no impact on the provision of EMS in the annexed properties. Kiryas Joel Volunteer EMS (KJEMS) will need to increase its staffing and equipment.

Emergency Communications: The residents of KJ often call a private call center with Yiddish operators to request emergency assistance. An increase in population will likely not be an increased burden on the 911 Center.

Fire Service: Boundaries and Tax Impact: Under state law, the boundaries of a fire district do not automatically change when the boundaries of a village expand. However, Town Law §182 notes that resident taxpayers can petition the Town Board to diminish the fire district borders to exclude the annexed territory. The law states that the Town Board shall diminish the said fire district based on the petition. Presumably, this would occur if the annexation were to move forward.

If the fire district outside the Village of Kiryas Joel is reduced in size, the fire district may see a net increase in cost per dwelling unit: Although the district will confront a reduction in tax base (as the assessed value of real property within the district will have fallen by \$9.2 million), there will not be a substantial reduction in costs. Despite the potential reduction in calls for service, labor is volunteer and most of the capital and operational costs are fixed. If the tax base falls without a corresponding reduction in cost, the tax burden on remaining taxpayers would rise.

Fire Suppression: The Village of KJ Fire Department (KJFD) has appropriate response apparatus for a village of its current size and building types. KJFD has a mixed volunteer and paid company of firefighters. The majority of the volunteer firefighters have beards that prevent an adequate seal for self-contained breathing apparatus (SCBA) mask. Firefighters are required by OSHA to wear a mask when fighting a fire or operating in other immediately dangerous to life hazard (IDLH) conditions. Therefore, it is a violation of OSHA standards for the majority of their volunteers to fight a fire inside a burning building. KJFD compensates for this fact by hiring firefighters from nearby areas to respond on call to conduct interior operations at fire scenes. KJFD also hires firefighters to staff their station and equipment on approximately 75 days each year when religious observance would prevent firefighters from performing firefighting duties.

A larger village with more buildings and residents will have more fires and other emergencies. Under KJFD's current operational model, they will likely need to increase the number of times that they request mutual aid. This increased demand for service from neighbors would not be offset by any additional revenue for the neighboring departments.

Department of Planning

Transit Program Administration: The Village operates a municipal transit service for which the County Planning Department administers supporting Federal and State transit grants. The sole county cost arises from the non-federal, non-state ten percent county share of grant administration costs, which include overall operator oversight activities regarding village transit operations and maintenance of federally-supported bus equipment.

To date we have not identified other significant county expenditures that will experience an increase in cost as a result of an expansion of the population in the properties proposed for annexation.

Inconsistency With Town of Monroe Comprehensive Plan

The Annexation Proposal is inconsistent with Town of Monroe's Comprehensive Plan.

The annexation territory is comprised of lands currently zoned by the Town of Monroe as Rural Residential (RR-1 and RR-3) as well as smaller areas zoned Urban Residential Multi Family (URM). The Town of Monroe Comprehensive Plan references these zoning areas and while it acknowledges some of the Rural Residential Areas may be located in close proximity to the Village, these lands are not targeted for increases in development density. The Town of Monroe notes that because of the development constraints and sensitive characteristics of the lands, it recommends the use of clustering, limiting tree clearing, avoidance of siting development on ridges, and use low impact development techniques. Annexation will permit the Village (as described in the DGEIS) to rezone the lands PUD and permit development densities inconsistent with the Town's vision (and public interest).

EDUCATION

Monroe-Woodbury Central School District (MWCSD):

Special education services, including: If the annexed lands are not moved from the MWCSD to Kiryas Joel School District (KJSD), MWCSD will likely experience an increase in out-of-district placements by the Committee on Special Education for students with disabilities sent to KJSD.

Services to children with disabilities whose parents place them with extended family in Kiryas Joel for the purpose of accessing special education services (5-21).

If the annexed lands are not moved from the MWCSD to Kiryas Joel School District (KJSD), MWCSD will incur the cost of transportation, transition, support, and



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academic and health screening services for school age children whose families live in the annexed lands and attend a private school in Kiryas Joel.

Administrative costs of increased Title I and Title III federal funding to support academic intervention services for economically disadvantaged children, and English language learner services, respectively. The programs are administered by the school district in which the child resides, and the funds are transferred to the non-public school which the child attends. Specific estimates of these cost increases will be provided by June 22.

PRELIMINARY COMMENTS RELATING TO THE DGEIS

Below are preliminary comments on the DGEIS. The County fully reserves the right and expectation that we will be providing more detailed written comments on the DGEIS on or before close of business June 22, 2015.

Traffic Study: Traffic Impact Study: The traffic impact study is inherently flawed given that reductions in vehicle trips are estimated from the American Community Survey and by utilizing traffic counts rather than conducting a comprehensive origin and destination survey to calculate vehicular trips by dwelling unit type in Kiryas Joel. There is also no sound statistical or mathematical rationale in the DGEIS for reductions in vehicular trips and traffic impact between the no-build, 507 and 165 acre annexation alternatives. Furthermore, several major components that characterize a comprehensive traffic impact study such as a safety/accident analysis, an intersection level of service (LOS) evaluation, as well as a narrative of the anticipated traffic impacts and any changes in LOS that will occur on existing roadways both within and surrounding the Village are missing from the traffic impact analysis. Changes in the distribution of traffic on area roads due to annexation has also not been analyzed to any extent in the DGEIS.

The community relies on mass transit to address transportation needs and this is one of the primary underlying assumptions for reducing vehicle trips in the traffic impact analysis. However, there is no discussion on how mass transit services will be provided to the annexed property area.

Demographic Data Sources: The DEIS document must utilize a consistent data source to provide the socio-economic characteristics and demographic attributes which are ultimately relied upon to form conclusions throughout the DEIS. The DEIS currently draws upon several different versions of the ACS 5-year estimates to characterize modal split, vehicle ownership, journey-to-work data, and many other socio-economic



variables for the resident population of Kiryas Joel and the annexation areas. For example, Table 3.4-11 relies upon the 2006-2010 ACS Estimates to state that 24% of workers in Kiryas Joel utilize public transportation in their journey to work; however, when the most recent 2009-2013 5-year Estimates are referenced, the percent of workers utilizing public transportation is only 18%. Methodologically speaking, all variables relating to population data in a study should reference the same dataset; in this case, specifically the 2009-2013 ACS 5-year Estimates are the most recent data made available by the Census Bureau.

Population Growth: While it is true that the population residing in the annexation territory will increase regardless of the result of these petitions, the population growth will be substantially higher if the land is subject to the Village zoning rather than the Town zoning. The DGEIS assumes that full buildout of the annexation territory under the current zoning is 1,431 dwelling units; given the current household size of the Village, the maximum population of that area can then be anticipated to be approximately 8,443 people in about ten years. If however the annexation land is developed consistent with the current density of the Village of Kiryas Joel, which is approximately 6 units per acre, the maximum annexation territory density will be approximately 3,042 dwelling units, with a population of around 17,948 people in about ten years, more than double the population under the no-annexation scenario. The additional population living in the annexation territory will use energy, water and sewer capacity, transportation and transit capacity, emergency services, and social services at a rate consistent with other residents of the Village, causing a substantial impact to the public interest by straining the ability of the Village and the County to provide those services.

Population Projection Timeframe: The DGEIS projects the population of the Village out to 2025. The County feels that this is insufficient to account for the long-term impacts of the proposed annexations. We advise the Village to project the population of the Village according to all three scenarios--without annexation, with the 164-acre annexation, and with the 507-acre annexation—out to 2040. This will be consistent with projection timeframes contained within previous development proposals, and with projection timeframes developed by outside agencies such as the New York State Department of Transportation and the New York Metropolitan Transportation Council for other projects in the area of the Village.

The DGEIS seems to suggest that because population growth is constant under either scenario (annexation or no annexation) the water and wastewater service requirements are also equivalent. However, without annexation, a portion of anticipated growth would occur in surrounding Towns zoned with 3.0 acre parcel sizes

typically serviced with conventional wells and septic systems. Therefore the 'no annexation' scenario precludes the need for a share of the otherwise proposed expansion of centralized water and wastewater infrastructure. The DGEIS must examine the benefits and/or liabilities associated with relieving expansion pressure on centralized W/WW services by the use of distributed W/WW services under the 'no annexation' scenario.

Wetland Impacts: The DGEIS states that there are no wetlands within the annexation territory. This is not the case; the wetlands map in Section 3.6 of the DGEIS notes five areas designated as wetlands by the National Wetlands Inventory. Additionally, there are wetlands within the existing boundary of the Village, designated both by the National Wetlands Inventory and the New York State Department of Environmental Conservation. Development of the annexation territory will put additional strain on all these wetland areas through increased runoff, some of which will contain typical pollutants such as road salt and vehicle fluids.

Water: There is a plan in place to connect the existing Kiryas Joel water distribution system to the Catskill Aqueduct. In the meantime, the Village continues to develop groundwater sources in order to meet demands within the system. Plans, however, have not been submitted and finalized for either the connection to the aqueduct, or to continue to develop groundwater sources until such time as that connection is made. This does not necessarily mean that the Village will be unable to meet system demands (regardless of annexation), but proper planning is necessary to show how the Village will meet those demands as growth and system usage continues to increase. There is an assumption that adequate supply exists from both groundwater and aqueduct sources, but little mention is given to how this will be implemented or on what schedule to keep pace with demands.

The DGEIS indicates that centralized water available to the Village will include use of the Mountainville test wellfield which remains under permitting review. Use of this wellfield would constitute an interbasin water transfer, importing water from the nearby Woodbury Creek watershed. A 2011 Mountainville Well pumping test report by the applicant's consultant (LBG) describes a 425 gpm pumping test at this site, and includes calculations suggesting up that 1,212 gallons per minute might be supported by this location. On August 12, 2010, Chazen recorded a flow of 2.14 cfs (960 gpm) in the Woodbury Creek (August 2010 field report by Chazen for OCWA). On the basis of reference watersheds with available performance statistics, yet lower flow conditions in the Woodbury Creek would be expected approximately 10% of the time (e.g. less

than 960 gpm approximately one month per year). Page 2-10 of the DGEIS does not confirm the volume of water needed from the Mountainville test well site, nor discuss stream or biological impacts of accordingly gallon-for-gallon flow reductions in Woodbury Creek at either the demand rate under the 'annexation' scenario or the likely lower demand rate under the 'no annexation' scenario when a share of the proposed growth would be supported by individual wells.

Wastewater: There is no plan to expand capacities at the KJ Sewer Plant, as overflows from the pump station are routed to the rest of the Orange County collection system for treatment at the Harriman plant (i.e., with the exception of flows from the poultry processing plant, flows to the KJ plant are limited by pumping rates). While there is currently existing capacity at the Harriman plant, a facility study has been commissioned by the County to identify means of increasing treatment capacity within the Sewer District in order to meet projected future flows throughout the District. This expansion is needed with or without the annexation but if the annexation is permitted. the planned expansion may need to increase further. The cost of any potential expansions at Harriman will be borne by the entirety of the sewer district, even though growth rates, and thus treatment capacity allocation, is greater within KJ than other areas of the County. This is not inconsistent with the Orange County Sewer Use Law, nor is it in conflict with general sewer district practices. However, the statement that "...annexation will not result in negative fiscal impacts to OCSD#1 (pp. 3.5-33 of the DGEIS) is not fully examined or substantiated. With respect to wastewater, growth in the annexation area will result in increased capital costs throughout the District. While these costs may be mitigated by the addition of new users to share the burden, no discussion of this aspect is included in the DGEIS. Both Monroe and Kiryas Joel, as part of determining whether this annexation is in the overall public interest, should quantify the cost of expanding wastewater treatment if the annexation goes through on taxpayers in both Monroe and Kiryas Joel.

Impacts to the Ramapo River: This goes unaddressed in the DGEIS. The Village wastewater system, which will be serving the bulk, if not all, of the development occurring in the proposed annexation territory, drains into an unnamed tributary of the Ramapo River. The unnamed tributary has been shown to have high levels of salinity, a degradation of the water quality that can be traced directly to point and nonpoint source pollution occurring within the current Village boundary. Additional development in the annexation territory will further degrade water quality in the unnamed tributary and further downstream in the Ramapo River watershed. The impacts of the Ramapo River must be addressed in the DGEIS.

Growth Inducing Impacts: The DGEIS does not adequately address induced growth and cumulative impacts. The DGEIS assumes population growth within the combined study area (Village and Annexation territory) to be constant under either scenario (annexation or no annexation). It does not estimate the additional growth potential attributable to the action. This underestimates the long-term potential for growth (and along with that growth, the needs for water and wastewater infrastructure).

The position of the proposal is that growth will occur regardless of annexation and the impacts of growth are somehow not linked to annexation. The DGEIS acknowledges that annexation will increase development density within the annexation territory similar to the Village's density and development patterns. In many instances the DGEIS defers the evaluation of the impacts of readily foreseeable resultant actions (i.e., rezoning, extension of utilities) to sometime in the future and suggest that impacts be evaluated on a case by case basis as they happen. This is contrary to sound planning practices and the intent of SEQRA as it may constitute *segmentation*. Moreover, the DGEIS assumes growth apparently will be identical by either vertical growth or horizontal growth. The DGEIS should explain by both types of growth are apparently deemed mutually exclusive as the County does not understand such an apparent assumption.

Impacts to Natural and Visual Resources: The DGEIS does not adequately examine the impacts of growth on the territory proposed for annexation. For example, the document does not examine how potentially adverse impacts to natural resources (soils, wildlife, habitat, and wetlands, etc.) and visual resources in the proposed annexation territory will be avoided, minimized or mitigated. No estimate of disturbance of the various resources, no assessment of cumulative impacts as a result of directing growth to this area is provided per the scoping document.

Final Language: These impacts are substantial, and are insufficiently addressed in the existing DGEIS document. We advise the Village to conduct further evaluation of the points raised in this letter and to issue an Amended Draft Generic Environmental Impact Statement, as we do not believe the issues can be sufficiently addressed in a Final Generic Environmental Impact Statement as it stands.

We appreciate the opportunity to comment on this document, and we reserve the right to make additional comments regarding the DGEIS at a later time.

Attachment A: List of Parcel Errors on Petition for Annexation

- **The parcels listed in Column A ("Tax Parcels that need to be identified in petition document, according to Metes & Bounds Description") represent the tax parcels which are covered by and thus known to exist throughout the extents of the ten (10) geographic areas described legally using metes & bounds within Exhibit A:

 Annexation Territory Description of the Petition for Annexation of Territory submitted to the Town of Monroe Town Clerk's Office on 27 December 2013, but were not listed within Exhibit A. This list of parcels was generated using current real property and tax parcel boundary datasets maintained and provided by the Orange County Real Property Tax Services Office.
- *The parcels listed in Column B ("How Parcel is Identified within Exhibit A of Petition") represent how the corresponding tax parcel was identified within Exhibit A:

 Annexation Territory Description of the Petition for Annexation of Territory submitted to the Town of Monroe Town Clerk's Office on 27 December 2013; a list of parcels are provided with and accompany the legal metes & bounds description for each of ten (10) geographic areas proposed for annexation by this petition. Note that many parcels were absent or missing from the lists within Exhibit A, and are notated as such in this column.
- ***The parcels listed in Column D ("How Parcel is Identified within Exhibit C of Petition") represent how the corresponding tax parcel was identified within Exhibit C:

 Certification of Town Assessor of the Petition for Annexation of Territory submitted to the Town of Monroe Town Clerk's Office on 27 December 2013. This list of parcels was generated from the Assessor of the Town of Monroe and includes the Total Assessed Value for each lot in 2013.

Tax Parcels that need to be identified in	How Parcel is	What needs to	How Parcel is Identified	Petition	What needs to
petition document, according to Metes &	Identified within	happen to Exhibit A of	within Exhibit C of	Certification	happen to Exhibit
Bounds Description	Exhibit A of Petition*	Petition	Petition***	Comment	C of Petition
1-1-11.21	(not identified)	←ADD	1-1-11.21		correct
1-1-11.22	(not identified)	←ADD	1-1-11.22		correct
1-1-4.2	(not identified)	←ADD	1-1-4.2		correct
1-1-4.32	(not identified)	\leftarrow ADD	1-1-4.32		correct
65-1-32.1	1-2-1	change	1-2-1	Now 65-1-32	change
65-1-32.2	(not identified)	\leftarrow ADD	(not identified)		\leftarrow ADD
62-2-1	1-2-3.3	change	1-2-3.3		change
(removal)	43-1-11	REMOVE	(not included; removal)		
43-1-13	(not identified)	\leftarrow ADD	43-1-13		correct
43-1-14	(not identified)	\leftarrow ADD	43-1-14		correct
43-1-15	(not identified)	\leftarrow ADD	43-1-15		correct
59-2-11	43-3-1	change	59-2-11		correct
59-2-12	(not identified)	\leftarrow ADD	59-2-12		correct
59-2-13	(not identified)	\leftarrow ADD	59-2-13		correct
43-3-6	(not identified)	\leftarrow ADD	43-3-6		correct
43-4-1	(not identified)	\leftarrow ADD	43-4-1		correct
43-4-3	(not identified)	\leftarrow ADD	43-4-3		correct
43-4-4	(not identified)	\leftarrow ADD	43-4-4		correct
43-5-10	(not identified)	\leftarrow ADD	43-5-10		correct
43-5-11	(not identified)	\leftarrow ADD	43-5-11		correct
56-1-11	56-1-1.1	change	56-1-11		correct
56-1-12	56-1-1.2	change	56-1-12		correct
61-1-11	61-1-1.1	change	61-1-1,-1		correct
61-1-12	61-1-1.2	change	61-1-12		correct
62-1-11	62-1-1.1	change	62-1-11		correct
62-1-12	62-1-1.2	change	62-1-12		correct
63-1-11	63-1-1.1	change	63-1-11		correct
63-1-12	63-1-1.2	change	63-1-12		correct
65-1-27.2	65-1-27	change	65-1-27	Now 65-1-27.2	change
65-1-5.2	65-1-5	change	65-1-5	Now 65-1-5.2	change
(removal)	65-1-6	REMOVE	65-1-6	Now 65-1-5.2	REMOVE
66-1-11	66-1-1.1	change	66-1-11		correct
66-1-12	66-1-1.2	change	66-1-12		correct