3.2.10 Demographics Comments and Responses

Comment 3.2.10-1: (Letter 2, Steven Neuhaus, Orange County Executive, June 10, 2015): Population projection timeframe: The DGEIS projects the population of the Village out to 2025. The County feels that this is insuffcient 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 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.

Response 3.2.10-1: *As indicated throughout the DGEIS, annexation will not be a growth inducing action. It is intended to better accomodate the inevitable growth that is taking place in the local community. The DGEIS addressed growth, in large part, to assist reviewers in understanding what the implications are if annexation does or does not occur - but not because growth is a result of the annexation.*

A ten year time frame is a commonly used duration for planning studies. The County's own projections for population growth in Orange County go out ten years as do most municipal comprehensive plans. For example the County's AFEIS for the Harriman Wastewater Treatment Plant (WWTP), completed in 2010 was based on a population growth and build out analysis through 2025. The 2010 update to the Orange County Comprehensive Plan also contained population projections and housing forcasts out only to 2020. While the 2011 Woodbury Comprehensive Plan DGEIS did not contain any specific forcasts, the plan itself is a vision of the Village in 2020. Additionally the Orange County Final Water Master Plan, published in October 2010 only included five and ten year planning horizons. There is greater statistical accuracy with a projection that extends over ten years versus a twenty-five year projection. There are a significant number of unknown factors that can alter the results of a projection over a 25 year time frame.

In order to properly plan for services, Orange County projected the population of KJ at around 55,000 by the year 2020 in their ten year growth projections done in 2010 with no assumption of annexation. They did not do a 20 year projection.

The County projection can be accessed at:
http://www.orangecountygov.com/filestorage/124/1362/3210/Summary_Guide_to_Population_Projections_8-13-10.pdf

It is certainly an easy exercise to take the growth factors set forth in the DGEIS for the Kiryas Joel community and extend them out for another ten or twenty years. However, to do so in the DGEIS could be unnecessarily misleading, since population projections can be influenced by a variety of factors. A 10 year planning horizon is typically used since that is about the maximum amount of time it can be assumed that other variables remain relatively constant. County comprehensive planning is a better vehicle for long term studies and there have been infrastructure studies that have attempted to do just that. Those studies are in the public record and the County is well aware of those projections. See response to comment 2-1.

Comment 3.2.10-2: (Letter 5, Susan H. Shapiro, Esq., Preserve Hudson Valley, LLC., June 10, 2015): The DGEIS asserts that KJ's population growth would happen with or without the

proposed annexation. Does this mean the Village is contemplating violations of New York building and fire codes which limit occupancy of buildings for reasons of public safety? This statement is not based in fact, as population growth was much quicker when more space was available within the Village in the 1990's, than it has been over the last several years.

Response 3.2.10-2: *There have been many attempts at connecting one action of the Village to a projected future that simply serves to frighten people. It is not a useful exercise. The Village has no intention of promoting violations of the New York State Fire Prevention and Building Code to accomodate growth. As stated in the DGEIS and prior responses to comments, the population growth is projected to happen with or without annexation. As a result of this growth, without annexation, some additional infill development is likely to occur within the existing Village, at similar densities to recent projects in the Village. As shown in Table E-1 this density is projected to be 9.26 dwelling units per acre. Densities of eight to ten units per acre are typical of suburban high density multifamily development.*

It is notable from the growth study conducted by AKRF as part of the AFEIS for the Aqueduct Connection project that historical demographic statistics supported the conclusion that Village population growth has remained consistent and unaffected by the availability of water or sewer infrastructure. This study can be found in its entirety in DGEIS Appendix H-2. The specific reference to the relationship of infrastructure on growth can be found in Section C, Induced Growth.

Comment 3.2.10-3: (Letter 32, Robert A. Fromaget, Monroe, New York): The population growth analysis and the assumptions on which is was based in the DGEIS are fundamentally flawed and must be redone in either a Supplemental Generic Environmental Impact Statement or the Final Environmental Impact Statement. The DGEIS and the population data on which it relies grossly underestimates the potential growth of the Village of Kiryas Joel. Based on the analysis below, the Village by its internal growth rate and in-migration rate, which the data herein cited suggests is significantly higher than cited in the DGEIS, is likely to result in the growth of the Village to more than 147,063 people by the year 2040 if a sufficient housing stock in a geographically expanded Village is available to accommodate such a population expansion. The EIS must revise its population analysis to address the issues and concerns raised in this submission.

Response 3.2.10-3: *Comment noted. The Village respectfully disagrees with the above comment and notes that it's growth projections are reasonable and accurate and actually lower than the Orange County Planning Department projections of population in the Village for the year 2020, as identified in the reference noted in Response 3.2-1.*

These projections are consistent with other population studies conducted relative to the Villages population as noted in the DGEIS. Additionally, a 1991 Comprehensive Sewerage Study prepared by Hazen & Sawyer for Orange County projects a population between 25,000 and 30,000, averaging 28,000, consistent with the projections in the DGEIS.

Comment 3.2.10-4: (Letter 32, Robert A. Fromaget, Monroe, New York): The DGEIS used the 2010 U.S. Census population of 20,175 but this represents the population when the Census was collected during 2010 and does not consider the year end final population which was 20,878. This is supported by the U.S. Census Summary document on page 1 of section H1.

Using the year-end rate would result in a much higher population over the time period of 2010 to 2040.

> ***Response 3.2.10-4:*** *As detailed in Table E-3 of the DGEIS, although the population projection references the 2010 Census population (which is the most recent actual count), the projection uses the US Census American Community Survey 2013 estimate of 21,894 persons as a starting point to more accurately reflect current conditions. This was the most up to date information available when the analysis was conducted. By comparison the US Census American Community Survey 2014 estimate of population is 22,246 persons.*
>
> *It should be noted this represents less than two percent annual growth which indicates the six percent used in the DGEIS may be conservatively overstated.*

Comment 3.2.10-5: (Letter 32, Robert A. Fromaget, Monroe, New York): The DGEIS used school age girls in the Kiryas Joel own parochial schools as the only population driver and this is not based on any methodology that I have seen for projecting population. This approach is not verifiable since there is no independent source for this information besides the tables in section H3 of the DGEIS.

> ***Response 3.2.10-5:*** *The consistent nature of the Kiryas Joel population, and the cultural norms that drive population growth are unique and lend themselves to a more specific assessment of projected population. The Village tracks it's growth very carefully as part of its ongoing responsibility to properly plan and provide services to its citizenry.*
>
> *The population of school age girls is indeed the primary driver for growth given the history and culture of the Village and is a valid factor to use in examining population growth. The source of the data is the NYS Education Department Basic Education Data System (BEDS) Enrollment Summary and is readily available to the public.*

Comment 3.2.10-6: (Letter 32, Robert A. Fromaget, Monroe, New York): The DGEIS assumes that the U.S. Census growth rate was valid. However, my analysis suggests that the U.S. Census data is flawed and does not reflect the Kiryas Joel actual growth rate. In fact, my study suggests that the growth rate is closer to 8.5% and is consistent with the housing unit growth over the 2000 to 2010 period.

As a result of the fact that the DGEIS used population by age, I reviewed the various population groups presented in the U.S. Census in order to determine where they got the projections in Section H1 of the DGEIS. Table 1.0 (in Letter 32 attached) contains a summary of my review of the total population growth in Kiryas Joel from 2010 to 2040 and when added to my previous study becomes scenario number 4.

> ***Response 3.2.10-6:*** *Comment noted. The 2010 Census reports 3,666 occupied housing units, compared to 2,229 occupied housing units reported by the 2000 Census. This represents an average of 6.4 percent growth over the ten year period which is consistent with the growth projections as shown in Table E-3 which generally range between 5 percent and 7 percent.*
>
> *The US Census is the standard used by every community in the United States for comprehensive planning purposes of housing, infrastructure and other services.*

Utilizing an alternative source of data could be useful as an exercise, but likely more speculative than the US Census.

Comment 3.2.10-7: (Letter 32, Robert A. Fromaget, Monroe, New York): Since the 15 to 24 age group is the group that is culturally significant how could the 2000 to 2010 U.S. Census data suggest that this group grew at an average rate of 13.4% a year over that 10 year period. This group represents 18% of the total population and given the statements by the leaders of Kiryas Joel concerning their culture it is unrealistic to suggest that they grew an average of 13.4% a year. This is especially evident given the growth rates for the other age groups in table 1.0 above. What I suspect actually happened was that this group was not properly counted in the 2010 Census.

Response 3.2.10-7: *There is no evidence to suggest that the US Census counts are unreliable. A comparison of the 13.4 percent growth in population to the 18 percent this age group makes up of the population is comparing apples to oranges. These are two unrelated calculations.*

Comment 3.2.10-8: (Letter 32, Robert A. Fromaget, Monroe, New York): The growth of the "under 5 group" suggests that these children are not being born in this community but are "in-migrating" to Kiryas Joel. This is supported by the fact that the growth of the 25 to 34 age group was 90.7% from 2000 to 2014 while the 15 to 24 age group grew at a rate of 13.4% over that same period. Thus, the 25 to 44 group is the one that is providing the real growth for Kiryas Joel. This is supported by the data in Table 2.0, Female Growth in Kiryas Joel. Table 2.0 shows that the 15 to 24 female group only grew by 7.5% from 2000 to 2010 while the 25 to 34 age group grew by 104.1%.

My outlook supports a total growth for Kiryas Joel without "in-migration" of 140,190 residents by 2040. However this does not consider the imbalance between the female population and the male population.

Based on the rate derived from the 2000 to 2010 U.S. Census data it is expected that Kiryas Joel's female population will grow faster than their male counterparts from 2010 to 2040.

Response 3.2.10-8: *The growth of the 25 to 44 age group represents the bubble in the population that is moving through the various age categories created by the significant in-migration into the Village upon its incorporation and rapid growth in the early 1980's. Those persons in the 2010 Census 25 to 34 age group are the children that were born or moved to Kiryas Joel during its early development.*

The 2000 population 15 to 24 age group was 3,237 persons. The 2010 population 15 to 24 age group was 3,671 persons, thus the 15 to 24 age group actually grew by 11.3 percent between 2000 and 2010. (You cannot add the percent in each category to determine the percent growth).

There is no impact to the population analysis contained in the DGEIS based on any imbalance between the male and female population. The analysis is driven by the number of females starting families. If for some reason there is a higher percentage of males, this would not alter the results of the analysis.

Comment 3.2.10-9: (Letter 32, Robert A. Fromaget, Monroe, New York): The data in Table 2.0 of Letter 32 shows that the female population will grow by 64,786 residents from 2010 to

2040, or 666% over the 30 year period. As you can see in Table 2.0 there is one group that continues to grow at a suspiciously slow rate of growth. That is those females reaching the age for marriage, i.e. 15 to 24. This raises a couple of concerns. What happens to the total populations for those under 14 once they turn 15? Where do they go? Or were the 15 to 24 year old females even counted in the 2010 Census when it was conducted.

> ***Response 3.2.10-9:*** *The commenter's rationale behind the projections presented out to 2040 are not clear. It is not substantiated where the growth projections over the 30 year horizon in his report are derived from.*
>
> *The 2010 Census shows 51.8 percent of the overall population are males and 48.2 percent are females. In 2010 there were 3,460 males between the ages of 15 and 34 and 2,974 females of the same age.*
>
> *The BEDS School data provides an accurate count of the current number of female students who will be the mothers in the Kiryas Joel community over the next ten to twelve years.*
>
> *There is greater statistical accuracy with a projection that extends over ten years versus a thirty year projection. There are a significant number of unknown factors that can alter the results of a projection over a 30 year time frame.*

Comment 3.2.10-10: (Letter 32, Robert A. Fromaget, Monroe, New York): With the low number of 20 to 24 year olds where did the 25 to 34 population come from? Were they "in-migrants" or are they the women that were not counted in the Census Survey? Since Kiryas Joel leadership states they they have very little "in-migration" it suggests that they were in Kiryas Joel in 2010 but were not counted.

> ***Response 3.2.10-10:*** *The 2010 Census reports 2,763 persons in the combined categories 25 to 29 and 30 to 34. This population would have been 15 to 24 at the time the 2000 Census count was taken. The 2000 Census reports 3,237 persons in the combined categories 15 to 19 and 20 to 24. These numbers do not indicate there are any under counted women.*
>
> *The 25 to 34 year olds counted in the 2010 Census would have been born between 1976 and 1985. The land for Kiryas Joel was incorporated in 1977, and experienced rapid development and a significant increase in the number of babies born during this time. This accounts for the bubble of this age group in the population.*

Comment 3.2.10-11: (Letter 32, Robert A. Fromaget, Monroe, New York): The male population projections shown in Table 2.0 are growing at a slower rate than the female. This suggests that the "in-migration" of males to Kiryas Joel will add to the internal growth rate and by 2040 it will reach a total of 12,558 in order to provide spouses for the larger female population. The only group that has more males than females is the 15 to 24 group in 2010.

> ***Response 3.2.10-11:*** *Since the population projection is based on the number of new families being created; and since the variable is the number of actual female students, who, based on cultural norms have a high likelihood of remaining within their community, where spouses come from is irrelevant to the analysis.*

Comment 3.2.10-12: (Letter 32, Robert A. Fromaget, Monroe, New York): Although the male population in 2010 was higher than the female population the rate of growth for the males was slower between 2000 and 2010 and the growth of the females will exceed that of the male population about midway through the 2020's.

The concern with this shortfall in males is that the community currently claims that they need the housing for the newlyweds between the 15 and 24 years of age. Yet that group (15 to 24) has more men than women which would mean there will be men who are available to be relocated to find a spouse in other communities.

> ***Response 3.2.10-12:*** *Refer to Response 3.2.10-11. This population analysis is driven by the location of the female students.*

Comment 3.2.10-13: (Letter 32, Robert A. Fromaget, Monroe, New York): Then there is the group that is in the 25 to 44 age groups that is growing faster than the 20 to 24 age group. The 20 to 24 age groups is too small to sustain the growth of the 25 to 44 age groups from within the community thus requiring more "in-migration." This raises a question, "Who is actually in need of the housing and where are they coming from?"

The shortfall in available men mainly exists in the population in the age group under 5 to 14 years of age, where 6,872 males are needed to ensure the females have spouses. All of these conditions suggest a larger "in-migration" will be needed to support Kiryas Joel's growth and it will further escalate their growth.

> ***Response 3.2.10-13:*** *The 25 to 44 age group is not manufacturing more people. As described earlier, there was a bubble in the population growth created by the significant in-migration to the Village of Kiryas Joel when it was first founded. The person who was 25 to 30 in 2010, when the Census was taken, would have been born between 1980 and 1985 when the rate of growth in the Village was relatively high.*
>
> *Since the population projection is based upon the number of female students, who will form the nucleus of the new families, it is not critical to the analysis whether the males come from inside or outside the existing Village. According to the Hasidic culture, females willremain in their home village.*

Comment 3.2.10-14: (Letter 32, Robert A. Fromaget, Monroe, New York): Senior growth rates need to be adjusted to reflect reasonable growth. The age groups 55 to 59 and 60 to 64 had significant increases from 2000 to 2010. However, the 2000 population in these groups were less than 100 and the 2010 populations were over 400 resulting in significant growth rates for both of these age groups. Looking at the estimated 2011 thru 2013 growth rate for this population was of no use since the actual projected in the U.S. Census data for those years bounced up and down and had no value. Therefore, I converted to using the 5.4% growth rate for Kiryas Joel's community for both of these age groups.

> ***Response 3.2.10-14:*** *There are cultural and medical factors, including the generation of Jews lost in the Holocaust, that contribute to the relatively low numbers of senior citizens in this community. It is not this segment of the population that drives the growth in this community. Use of the referenced 5.4 percent growth rate by the commenter is arbitrary and not substantiated.*

Comment 3.2.10-15: (Letter 32, Robert A. Fromaget, Monroe, New York): Taking a closer look at the 15 to 24 year old population. Table 4.0 looks at the population and compares the population growth from 2000 to 2010 and shows that the growth in Kiryas Joel is in need of investigation since it is the only municipality that is growing below their U.S. Census population growth rate (See the last column in Table 4).

Table 4.0 provides an interesting picture and reinforces my concern about the accuracy of the U.S. Census for 2010. Upon careful review what you find is the Kiryas Joel population data for the age of 15 to 24 for both females and males, according the U.S. Census, grew 13.4% from 2000 to 2010, while all of the other communities in that district grew at a much faster rate. If you look at Appendix A2 (Kiryas Joel U.S. Census Data by Age Groups) the data suggests that the growth for this population in Kiryas Joel remains almost flat over the 2010 to 2040 time period.

> ***Response 3.2.10-15:*** *There is no evidence to suggest that the US Census counts are unreliable.*

Comment 3.2.10-16: (Letter 32, Robert A. Fromaget, Monroe, New York): In order to assess the number of residents that would fall into the 15 to 24 categories I took the Kiryas Joel population growth from 2000 to 2010 and made the following adjustments:

1. Adjusted the 15 to 19 population to have the same growth rate as that of the 10 to 14 year olds (females - 6.6% growth; males – 5.0% growth).
2. Adjusted the 20 to 24 population to have the same growth as the 24 to 34 age group (females - 10.4% growth; males – 7.9% growth.)

This adjusted population growth for Kiryas Joel adds in an adjustment to the 15 to 24 age groups growth rate and then spread out the growth taking into consideration the fact that the females are growing at a faster rate than their male counterparts. It takes the 2000 to 2010 growth rate and divided it for each age group by the total of the female and male growth for those age groups. The total population growth was then distributed based on the percentage of growth each was responsible for. The result is an increase in the female population of 12,059 over the original calculation presented in the original document I submitted concerning the Annexation.

The final female population projection is 92,004 by 2040. However, again this is a conservative growth estimate as I show in my original Orange County Sewer District, Water Demand, Wastewater Projections, Assessment and Investigation Document submitted with my original submission.

> ***Response 3.2.10-16:*** *Comment noted. The US Census is a count of the actual people in each age category and does not need to be adjusted to be accurate. As discussed earlier, the DGEIS population projection uses a count of current female students to project the future number of new families.*

Comment 3.2.10-17: (Letter 32, Robert A. Fromaget, Monroe, New York): This adjusted population growth for Kiryas Joel adds in an adjustment to the 15 to 24 age groups growth rate and then spread out the growth taking into consideration the fact that the females are growing at a faster rate than their male counterparts. It takes the 2000 to 2010 growth rate and divided it for each age group by the total of the female and male growth for those age groups. The total population growth was then distributed based on the percentage of growth each was

responsible for. The result is an increase in the male population of 12,506 over the original calculation presented in the original document I submitted concerning the Annexation.

This growth total is due to the change in the 15 to 24 year old groups and is consistent with the fact that the males in these groups grew faster than the females.

Response 3.2.10-17: *Refer to responses 3.2.10-13 and 3.2-10-16.*

Comment 3.2.10-18: (Letter 32, Robert A. Fromaget, Monroe, New York): The total estimated population found in this scenario based on 2000 to 2010 growth rate projections for each age group is 147,063 by 2040. The estimated in-migration will be 19,287. This will bring the total population of Kiryas Joel [adjusting for the 15 to 24 year old population] to 184,007 by 2040.

Response 3.2.10-18: *Comment noted. The Village respectfully disagrees with the above comment and believes that it's growth projections are reasonable and accurate.*

Comment 3.2.10-19: (Letter 42, Lorraine McNeill, June 21, 2015): The DGEIS, should also include growth due to the influx of Satmar from areas such as Brooklyn.

Response 3.2.10-19: *The growth projections take into account births and in-migration.*

Comment 3.2.10-20: (Letter 49, Michael & Mary DeFranco, June 19, 2015): Projections for growth in KJ were only established for 10 years, my understanding is a 20 year projection is required to truly assess the impact of rapidly expanding population on natural resources and the infrastructures needed to support this large population growth.

Response 3.2.10-20: *See Response 3.2.10-1.*

Comment 3.2.10-21: (Letter 50, John Ebert, Chairman, Monroe Conservation Commission, June 20, 2015): What is the average population density in the unincorporated area of the Town, outside the Village? No meaningful comparison of population density is provided.

Response 3.2.10-21: *The Town of Monroe is 21.3 square miles and had a population of 39,912 per the 2010 Census, thus the density is 1,874 persons per square mile. By comparison the Village of Kiryas Joel is 1.11 square miles and has a 2013 population of 21,894 thus the density is 19,903 persons per square mile.*

Comment 3.2.10-22: (Letter 50, John Ebert, Chairman, Monroe Conservation Commission, June 20, 2015): Please address whether the 27 percent population growth in the Town of Monroe is largely a result of growth in the VKJ.

Response 3.2.10-22: *Any increase in growth of the Town overall would include growth within the three Villages, Kiryas Joel, Harriman and Monroe.*

Comment 3.2.10-23: (Letter 50, John Ebert, Chairman, Monroe Conservation Commission, June 20, 2015): There is no basis for limiting the build out analysis to 2025. The full potential population projection from annexation, and a density of 12-20 dwelling units per acre, must be estimated, and the impacts with that population assessed.

Response 3.2.10-23: *See Response 3.2.10-1.*

Comment 3.2.10-24: (Letter 50, John Ebert, Chairman, Monroe Conservation Commission, June 20, 2015): The 1,431 dwelling units in the WOA alternative include accessory apartments which can only accommodate two bedrooms. The population from the WOA will be less than with the WA. The DGEIS incorrectly assumes that 5.6 persons on average can be accommodated in a two-bedroom accessory apartment.

Response 3.2.10-24: *The 5.6 persons would be accommodated in a Single Family House with an accessory apartment, not in just the apartment.*

Comment 3.2.10-25: (Letter 50, John Ebert, Chairman, Monroe Conservation Commission, June 20, 2015): The DGEIS acknowledges that the build out population can be accommodated within South Blooming Grove, Monroe and Woodbury. It would appear, based on that statement, that the need for annexation is to change the zoning for the benefit of certain developers, and not based on any community need.

Response 3.2.10-25: *The action being considered is the annexation of land to expand the service area of the Village of Kiryas Joel. As the DGEIS acknowledges, the anticipated population increase could be accommodated in South Blooming Grove, Monroe and Woodbury, or other surrounding areas. However, this would do nothing to provide the services offered by the Village of Kiryas Joel or address future over-congestion within the existing boundaries.*

Comment 3.2.10-26: (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015): 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 on infrastructure and service demands.

Response 3.2.10-26: *See Response 3.2.10-1.*

Comment 3.2.10-27: (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015): Data Sourcing: The DGEIS cites data from a number of different sources and years, making a direct comparison of data impossible. We maintain that the DGEIS document must utilize a consistent data source to provide the socio-economic characteristics and demographic attributes which may be relied upon to form conclusions throughout the DGEIS. The DGEIS 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 socioeconomic variables for the resident population of Kiryas Joel and the annexation areas; thus, the Lead Agency is allowing itself to pick and choose the data that presents the 'best picture.' For example, Table 3.4-11 relies upon the 2006-2010 ACS Estimates in stating 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%. All variables relating to population data in a study should reference the same inter-censual dataset to present a consistent method of analysis. In this case, the most recent data available from the Census Bureau is the 2009-2013 ACS 5-Year Estimates.

Response 3.2.10-27: *The U.S. Census Bureau is constantly conducting new surveys and releasing data from surveys. Different surveys gather different information and*

survey elements are sometimes altered as surveys are updated. Since no one survey has all the data useful to a DGEIS study, more than one survey is commonly used. Below are some data used from the 2006-2010 ACS and updated data from 2009-2013.

The 2009-2013 data shows a widening gap between car usage indicative of traffic in the Build Condition being less than projected and the No Build Condition being less than projected in Kiryas Joel and higher than projected in the 507 acres if not annexed. Overall the data in FGEIS Table 3.4-1 below suggests the 507 Build (annexation) condition is better than indicated in comparison to the 507 acre No Build (no annexation) Condition As presented in the DGEIS.

FGEIS Table 3.4-1
Mode of Transportation To Work

Mode of Travel	Village of Kiryas Joel		Village of Harriman	
	ACS [1] (2006-2012)	ACS [2] (2009-2013)	ACS [1] (2006-2012)	ACS [2] (2009-2013)
Drive Alone	29%	27.6%	63%	67.1%
Carpool	15%	17.2%	5%	17.4%
Public Transit	24%	17.8%*	19%	10.2%*
Walk	26%	34.1%	5%	0.3%
Bicycle	0%	**	1%	**
Other (Taxi, Motorcycle)	0%	1.6%	2%	0.9%
Work At Home	6%	4.5%	4%	4.1%

[1] Source: As shown in DGEIS Table 3.4-11 rounded to nearest percent from US Census American Community Survey 2006-2012.

[2] Source: US Census American Community Survey 2009-2013.

* Includes Taxis in Public Transportation instead of other

** Not shown separately.

Comment 3.2.10-28: (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015): Population Projection Timeframe: The DGEIS projects the population of the Village out to 2025. This is palpably insufficient, arbitrary and capricious. Under any reasonable planning based standard this fails to address the long-term impacts of the proposed annexations on infrastructure and service demands. Given the population density of the Village of Kiryas Joel presently, a ten year build out presents a grossly inadequate picture of the actual impacts of this annexation. 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.

Response 3.2.10-28: *As indicated throughout the DGEIS, annexation is not projected to be the cause of Kiryas Joel population growth. Annexation is intended to better accomodate the inevitable growth that is taking place in the local community. The DGEIS addressed growth, in large part, to assist reviewers in understanding what the implications are if annexation does or does not occur - but not because growth is a result of the annexation.*

A ten year time frame is a commonly used duration for planning studies. As referenced

in Response 3.2-1, the County's own projections for population growth in Orange County go out ten years as do most municipal comprehensive plans.

It is certainly an easy exercise to take the growth factors set forth in the DGEIS for the Kiryas Joel community and extend them out for another ten or twenty years. However, to do so in the DGEIS could be unnecessarily misleading as contributing factors have a tendency to change.

County comprehensive planning is a better vehicle for such studies and there have been infrastructure studies that have attempted to do just that. Those studies are in the public record and the County is well aware of those projections. Refer to response 3.2-1.

Comment 3.2.10-29: (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015): The DGEIS asserts that the population will grow at the same rate regardless of whether the annexation occurs or not. The DGEIS should address the validity of this forecast in several respects.

a. Without annexation, the DGEIS assumes that the unit density within the Village will rise from approximately 6 housing units per acre to 9 housing units per acre. The DGEIS should address whether such a rapid buildout is realistic, given the existing residential density.

b. It is not sufficient to simply assert that such a rapid buildout within the Village will unquestionably occur if annexation is denied. What alternatives—including building new housing on lands in close proximity to the Village (but outside the Town of Monroe)—exist, and what would be the implications of such development?

c. In the event that annexation occurs, will the density within the Village increase regardless? If so, this would enable population growth even greater than that forecast in the DGEIS. Such growth could come from, for-instance, in-migration.

Response 3.2.10-29 a: *The DGEIS population analysis was not based on an underlying assumption that the density within the Village would necessarily rise. Instead it assesses what the impact would be if only 1,431 of the projected 3,825 housing units were built on the annexation land, and projects that under this scenario, the result would be an increase in density to 9 units per acre, if the Village were to accommodate the remaining 2,394 units.*

Response 3.2.10-29 b: *The female students that will form the nucleus of the future families of this community are real and are attending school in the local religious schools today. Tradition suggests that these girls and the families they create at the age of 20 will remain within their community. This is the basis of the assertion that the population will grow with or without annexation. In projecting where these families will live, the DGEIS allocates the population growth first to the unoccupied lands in the annexation territory, since these properties are already owned by Hasidic families, who are very likely the parents of the female students. It is projected that the annexation lands would be developed at densities consistent with the current Village zoning. It is only the remainder of the population growth that could potentially infill the existing Village.*

As stated on page 3.2-7: "If the entire remaining population were to be accommodated within the existing Village limits, there would be a significant increase in density in certain locations. Some or all of this population could also locate in other areas

proximate to Kiryas Joel rather than within the existing Village, including in Monroe, Woodbury and South Blooming Grove. However, for the purpose of this analysis a maximum impact scenario is presented that locates all remaining population within the existing Village limits."

*The analysis is presented in order to assess the maximum impact **IF** all the remaining development were to occur in the Village, and concludes that the result would be a significant increase in the existing density of the Village. The statement above acknowledges that the population could locate in other areas but is not likely.*

***Response 3.2.10-29 c:** The population projections are not based on density or where the population will live, but instead are based on a reasoned projection of the number of female students starting families at age 20, at sizes similar to the current family size in Kiryas Joel. As presented, annexation of the 507 acres could accommodate the projected growth thus diminishing any need for additional density in the existing Village.*

Under the scenario posed, in-migration would not necessarily be the result of annexation. As the AKRF Growth Study concluded in-migration is not a significant source of population growth, and there is no reason to believe that annexation will change that dynamic. This community's population growth is internal and is organic. Any in-migration would be nominal.

Comment 3.2.10-30: (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015): If the annexation is denied, physical constraints may force the community to accommodate new families in nontraditional ways, perhaps involving the relocation of established families to other locations to make room for new family formation within the Village proper. The DGEIS should thoroughly address the impact of the increased population growth that would result from the annexation's denial.

***Response 3.2.10-30:** The DGEIS addressed the "no action" alternative consistent with New York State law Since the population growth is remains constant with annexation or without annexation, the impacts from such growth are likewise relatively the same. Since it is the distribution of this population that will vary with annexation, the DGEIS comes to the conclusion that with annexation there will be an increase in the density of development on the annexation lands.*

This comment seeks further speculative analysis of non-traditional ways to accommodate the population growth. An adequate SEQRA analysis need not evaluate every conceivable environmental impact, mitigating measure or alternative. Identifying non- traditional ways of accommodating new families and the associated impacts, is far too speculative and beyond the scope and requirements of SEQRA and the DGEIS.

Comment 3.2.10-31: (Letter 55, Sheila Conroy, June 22, 2015): In the document, it was stated that the average Kiryas Joel household size is 5.9 people but sometimes 5.1 people were used for water, sewer and growth calculations. Over a period of the ten years shown, this will underestimate the accumulative impacts.

***Response 3.2.10-31:** The current average family size is 5.9, as published in the Census 2008 to 2012 ACS population estimate as shown in Appendix H, and was thus used to forecast the size of future families.*

The need for additional water and sewer capacities was projected on a per capita basis and not by family size. Water utilization is estimated to be 66 gallons per person per day. A full discussion of this calculation and its relationship to sewer capacity is included in the DGEIS Section 3.5.

The only reference to 5.1 persons per unit is shown on Table E-1. The population analysis is based upon an average family size of 5.9 persons for the new families that will be created by the current female students. Since it will take several years for a new family to become a family of 5.9 persons, a factor was included in the analysis to allow this growth to happen. When you look at the overall population divided by the number of units, as is done in Table E-1 the average is 5.1 not 5.9 based on the adjustment for family growth. A factor of 5.1 was never used in design calculations for water and sewer.

The act of annexation will not cause growth.

Whether the population growth projected turns out to be somewhat higher or lower than the projected estimates, there will be future residents who will need housing and associated infrastructure. The Village has taken all necessary steps in the past to support the growth of its community and will do so in the foreseeable future, regardless of the projections provided herein.

Comment 3.2.10-32: (Letter 55, Sheila Conroy, June 22, 2015): For all of the above reasons, the DGEIS must address impacts out to a 20 year time frame. Ten years is simply too short and limited given the unusual and unique characteristics of this community's growth patterns.

Response: 3.2.10-32: *The ten year time frame has been determined to be suitable for many local communities including Woodbury, Tuxedo and Orange County. (See response 2-3.) The Village believes that a ten year time frame for informational and planning purposes is more than reasonable. However, the population of the study area in the next ten years is expected to be the same whether annexation does or does not occur.*

Comment 3.2.10-33: (Letter 61, Dennis E. A. Lynch, Feerick, Lynch, MacCarthney, PLLC, June 22, 2015): The growth projections are solely based on past growth and do not appear to give consideration to the potential exponential growth which could occur with the addition of vacant developable land. Additionally, we note that the analysis is only for a 10-year look ahead. At least a 25-year analysis is required.

Response: 3.2.10-33: *Comment noted. The Village believes that past growth and other factors used in projections are rational and reasonable. The analysis establishes a fairly consistent annual rate of growth of approximately 6 percent. Utilization of a percent growth factor accounts for the exponential growth as the population increases assuming all other variables remain the same. As noted in Response 3.2-1, a 10 year horizon is typically used since that is about the maximum amount of time it can be assumed that other variables remain relatively constant.*

As specifically addressed in the AKRF Growth Study for the Village of Kiryas Joel (2009), and as substantiated in the DGEIS analysis, growth has remained steady and consistent in the Village whether or not there was land or other utilities available and in-migration is minimal. There is no available information that would indicate that large

influxes of new residents are going to move to Kiryas Joel from elsewhere solely because of the annexation.

Comment 3.2.10-34: (Letter 67, Richard J. Pearson, PE, & Robert B. Peake, AICP, June 18, 2015): Table 3.2-1 does not indicate which are recorded and which are projected populations. This should be so noted on the Table.

Response: 3.2.10-34: *All population numbers in the table from 1980 to 2010 are published by the US Census. The population numbers for 2012 and 2014 are American Community Survey and are thus estimates, also published by the US Census. The percent growth was calculated from these numbers by TMA. The reference to New York State Education Department Basic Education Data System (BEDS) as a source is incorrect. Table 3.2-1 of the DGEIS is corrected below as FGEIS Table 3.2-1.*

FGEIS Table 3.2-1
Population in Kiryas Joel and Orange County 1980 to 2014

Year	Village of Kiryas Joel	Annual Change	Town of Monroe	Annual Change	Orange County	Annual Change
1980	2,088	--	14,948	--	259,603	--
1990	7,437	25.6%	23,035	5.4%	307,647	1.9%
2000	13,138	7.7%	31,407	3.6%	341,367	1.1%
2010	20,175	5.4%	39,912	2.7%	372,813	0.9%
2012	21,357	2.9%	42,194	2.9%	374,512	0.2%
2014	22,634	5.6%	--	--	--	--
Sources: US Census; AKRF, 2009; TMA, 2015.						

Comment 3.2.10-35: (Letter 67, Richard J. Pearson, PE, & Robert B. Peake, AICP, June 18, 2015): The Kiryas Joel population projections should be updated using the latest available American Community Survey (ACS) data for determining the Village's average family size.

Response: 3.2.10-35: *The 5.93 Average Family Size as published in the 2008-2012 ACS Census publication was the most current data available when the study was initiated. By comparison the 2009-2013 ACS estimate of Average Family Size is 5.86 persons. Rounding of each of these statistics yields the same factor of 5.9 which was the factor used.*

Comment 3.2.10-36: (Letter 67, Richard J. Pearson, PE, & Robert B. Peake, AICP, June 18, 2015): What is the geographic extent of the National Center for Health statistics used to project the number of annual deaths in Kiryas Joel? A broad geographical data set may not accurately reflect the unique characteristics of the Kiryas Joel population, such as less vehicular driving by the residents, etc. Would birth and death statistics from the Village provide more pertinent data?

Response: 3.2.10-36: *The National Center for Health Statistics provides the finest level of detail available for this statistic. This same source was referenced in the AKRF Growth Study for the Village in 2009.*

Since there is no hospital in the Village, the majority of the babies are born outside the Village and very few persons actually die within the confines of the Village. The New York State Department of Health maintains the database of vital statistics including detailed records of births and deaths within the Village. See DGEIS and FGEIS Appendix H3.

Comment 3.2.10-37: (Letter 67, Richard J. Pearson, PE, & Robert B. Peake, AICP, June 18, 2015): The DGEIS states that the projected 2014 population of the Village was compared to the number of marriage licenses issued in the Village between 2010 and 2013 and was also compared to the number of new building permits issued between 2010 and 2013 and "found to be reasonable". The specific numbers of marriage licenses and new building permits issued for the noted time period need to be included in the DGEIS so that the conclusion may be supported.

Response: 3.2.10-37: *According to the Village's records there were a total of 625 units of housing constructed during the period of 2010 to 2014, and 894 marriage licenses issued as listed below:*

Year	*Building Permits*	*Marriage Licenses*
2010	*63 units*	*112*
2011	*211 units*	*125*
2012	*125 units*	*169*
2013	*93 units*	*250*
2014	*133 units*	*238*

Comment 3.2.10-38: (Letter 67, Richard J. Pearson, PE, & Robert B. Peake, AICP, June 18, 2015): The analysis which the Village submitted to the State Environmental Facilities Corporation (EFC) in connection with the bonding of the Aqueduct Connection project relies on demographic growth projections through the year 2045, with 8,550 new residential connections and 1,500 new commercial connections. The EFC-related projection thus exceeds the year 2025 population analyzed in the DGEIS. This further supports our contention that the DGEIS timeframe ending at the year 2025 is not adequate for analyzing the proposed impacts of the annexation resulting from the buildout of the annexation properties.

Response: 3.2.10-38: See *Response 3.2.10-1 and Response 3.2.10-33. The rate of growth identified in the EFC submission indicates 250 to 300 new connections per year. This is consistent with the number of new housing starts indicated by the population analysis in the DGEIS.*

Comment 3.2.10-39: (Letter 68, Gale Pisha, Sierra Club Lower Hudson Group, June 22, 2015): The DGEIS for the 507-acre annexation, projects the population of Kiryas Joel (KJ) will almost double in the next 10 years. Projecting out to the year 2025 is not enough to adequately assess the impacts from this high rate of population growth, since the rate of growth will presumably continue past that date. With more typical development projects, the population of the development usually increases until full build-out of the development and then stops. The KJ DGEIS makes no statement that once this doubling of population occurs in 10 years, it will stop. Therefore a plausible time frame for projection of impacts should be much longer and at least the estimated lifetime of the water or sewer infrastructure, since this infrastructure will be needed to accommodate the continued rate of increase. At least a 50 year projection of population ·increase would be more adequate in properly identifying the environmental impacts of this population increase on the water and sewer capacity, as well as on other natural resources, in the region.

Response: 3.2.10-39*: See Response 3.2.10-1 and Response 3.2.10-33.*

It is reasonable to assume that growth will continue past 2025, but based on the data presented it is also reasonable to assume that the RATE of growth will be generally around six percent annually.

As noted earlier, in order to properly plan for services, Orange County projected the population of KJ at around 55,000 by the year 2020 in their ten year growth projections done in 2010 with no assumption of annexation. It did not do a 20 year projection.

The County projection can be accessed at: http://www.orangecountygov.com/filestorage/124/1362/3210/Summary_Guide_to_Population_Projections_8-13-10.pdf

Comment 3.2.10-40: (Letter 69, Daniel Richmond, Zarin & Steinmetz, June 22, 2015): Moreover, the DGEIS discussion of census data omits from discussion housing data available from U.S. Census Bureau. (See DGEIS at 3.2-2 to 3.2-3.) The SGEIS should include an analysis of the housing data provided by the Census Bureau. The SGEIS should also indicate what the Village population in 2010 would be calculated by multiplying an average family size of 5.9 persons (see DGEIS at 3.2-3 & 3.2-4) by the number of units reported in the Village by the U.S. Census. This analysis should also assess housing unit growth in the Village between 2000 and 2010. If the housing unit growth rate during this period differs from the population growth for the same time period by the U.S. Census, the SGEIS should explain why this might be.

Response: 3.2.10-40: *The 2010 Census reports the number of occupied housing units is 3,666 units in the Village of Kiryas Joel. If every occupied housing unit had 5.9 person living in it the total population would be expected to be 21,629 persons. Thus not every housing unit has 5.9 persons. If we divide the reported 2010 population of 20,175 persons by the number of occupied housing units the average occupancy would be closer to 5.5 persons per unit.*

There were 2,229 occupied housing units reported by the Census in 2000. This number grew to 3,666 units reported in 2010 representing a 64.5 percent growth, compared to a 53.6 percent growth in population. This trend is consistent with the conclusion that not every new household has 5.9 persons already living there.

Comment 3.2.10-41: (Letter 69, Daniel Richmond, Zarin & Steinmetz, June 22, 2015): The DGEIS also acknowledges that analysis prepared by Orange County reveals a significantly higher growth rate for the Village, and indicates that 10,000 more people would be residing in the Village than the DGEIS indicates by 2025. (See DGEIS at 3.2-3 to 3.2-4.) The DGEIS, however, fails to explain how it arrived at far lower projections for population growth than Orange County. The SGEIS should correct this deficiency and assess potential environmental impacts, including on water and sewer capacities through 2045, consistently with the County's projections.

Response: 3.2.10-41: *There is no deficiency in the DGEIS analysis. The DGEIS population projection is a rational statistical analysis based upon the actual count of female students in the schools of the Kiryas Joel community. These projections are generally consistent with the AKRF demographic study conducted in 2009 and the studies done for the Aqueduct Connection project. They are also consistent with the actual growth which occurred between 2000 and 2010.*

It is beyond the scope of this DGEIS to re-evaluate the County's population projections which appear to be high. Population projections are reasoned estimations based upon various factors and are subject to variation.

The annexation will not induce growth and is not directly related to water and sewer capacities. Studies have been done, upon which decisions have been made with regard to water and sewer usage and allocation. Re-analysis of these decisions is beyond the scope of the SEQRA analysis required for the consideration of an annexation petition.

Comment 3.2.10-42: (Letter 77, Joanne P. Meder, AICP, Meder Consulting Services, June 22, 2015): The DGEIS fails to provide any justification for establishing a 10-year time horizon for analytical purposes. In acknowledgment of the fact that the Village of Kiryas Joel has experienced a higher rate of growth than all other municipalities in Orange County over many years and that trend is expected to continue according to the Project Sponsor, combined with the long-range impacts and far-reaching implications that the proposed Annexation Petition is expected to produce, the environmental analyses undertaken for this DGEIS should have been based upon a time horizon of at least 20 years. More particularly, use of a longer study period is justified for any and all of the following reasons:

This approach would be more consistent with other population projection studies that were previously completed for the Village, such as the 2009 "Growth Study for the Village of Kiryas Joel Amended FEIS for the Proposed Connection to the New York City Catskill Aqueduct," presented in DGEIS Appendix H2.

Response: 3.2.10-42: *See Response 3.2.10-1 and Response 3.2.10-33.*

Comment 3.2.10-43: (Letter 77, Joanne P. Meder, AICP, Meder Consulting Services, June 22, 2015): The American Community Service (ACS) data presented in Table DPO5 of DGEIS Appendix H reveals that 25.3% of the Village's population is under the age of 5 using the latest available data. The 10-year study period used for all analyses in the DGEIS completely ignores the ultimate housing needs of this group, notwithstanding the DGEIS' stated assertion that most residents residing in the Village as children will remain there through adulthood and will typically require a family dwelling of their own by age 20, if not a year or two earlier at ages 18 or 19. In fact, the Village's population under the age of 5 is actually larger than the Village's population in the 5 to 9 year age cohort. So not only does the DGEIS ignore longer-term impacts associated with a growing population and all the other related impacts attendant to that condition, but it also ignores the growing bulge in the under 5 age cohort, which will have even more dramatic impacts in the future beyond the 10-year study period. For the environmental analyses to be defensible for the type of Proposed Action that is the subject of this DGEIS, the study period used for those analyses should correspond to the length of a generation. That would be approximately 20 years based on the life cycle characteristics of the population that is projected to reside in the expanded Village of Kiryas Joel.

Response: 3.2.10-43: *As discussed earlier there is a bubble in the population based on development and the influx of people in the early 1980's following the Village incorporation in 1977. There is an echo boom in the student population that is reflected in the 2025 population projection and the number of pre-k students in the following year which represents the babies of the babies born in the early 1980's. Similar to the Baby Boom in the US general population as a result of the end of WWII, these population bulges will move through the cohort of population. There may be an increase in the*

overall population based on this occurrence, but it will not change the foundation of the population projection.

Comment 3.2.10-44: (Letter 77, Joanne P. Meder, AICP, Meder Consulting Services, June 22, 2015): The use of only a 10-year study period severely underestimates potential long-term impacts. In addition to underestimating potential impacts on population concentration, distribution, and growth, and potential impacts on housing demand, the DGEIS analyses also fail to accurately identify projected demand for community services, facilities and utilities (especially sewer service), traffic generation, and projected land disturbance (especially of prime agricultural land, forested areas, wetlands, and buffers surrounding existing wetlands and other surface water resources, among others).

Response: 3.2.10-44: *The long term impact of annexation is the redistribution of municipal boundaries which affects where taxes are paid; what services are provided; and the land use decisions which are made. The act of annexation will not stimulate population growth, but instead will provide a framework to provide housing for the population growth that is anticipated based upon population changes observed over the past 35+ years.*

Site specific development proposals that come forward after the annexation decision would appropriately deal with specific demands for community services, utilities, traffic generation, and projected utilization of land use resources.

Comment 3.2.10-45: (Letter 77, Joanne P. Meder, AICP, Meder Consulting Services, June 22, 2015): Page 3.2-1- Section 3.2.1- Demographics: In the first paragraph on this page, it is stated that the Village of Kiryas Joel had a population of 20,175 in 2010 according to the U.S. Census. However, the actual U.S. Census data included in DGEIS Appendix H indicates that the 2010 population was 20,878. Similarly, different figures are presented for the Village's population in 2014. For example, Table 3.2-1 in Section 3.2.1 identifies a population of 22,643 while Table E-1 in FGEIS Appendix E identifies a figure of 22,634. Because so many different sources of population data are presented in the DGEIS, and some of that data is inconsistent, it is recommended that the accuracy of population figures cited in the DGEIS be reconfirmed and specific data sources be cited each time a population statistic is identified.

Response: 3.2.10-45: A revised *Table 3.2-1 is included in FGEIS Response 3.2.10-34 which shows the correct 2014 population of 22,634 persons.*

Appendix H includes a document Census Summary File 2010 prepared by Thomas Shepstone, but it is noted that it includes 4 census tracts, not necessarily the Village boundary, is the source of the 20,878 figure. Also included in Appendix H is the documentation published by the Census for the Village boundary limits which lists the 2010 Census population of 20,175. The 2010 Census population is listed as a reference, since it is the most recent official count. However, the DGEIS population projection uses the Census estimate of 21,894 population of as of July 1, 2013, as its base, also included in Appendix H.

Comment 3.2.10-46: (Letter 77, Joanne P. Meder, AICP, Meder Consulting Services, June 22, 2015): Table E-1 -- the following discrepancies are noted and should be resolved. The first section containing 2014 demographic statistics for Kiryas Joel states that the existing average family size is 5.9 persons per dwelling unit. This is a key statistic that is often cited in many other sections of the DGEIS and is used as a basis for the population projection through 2025.

However, it is not possible to verify the accuracy of that figure using the data presented in Table E-1. In fact, a figure of only 5.539 results from dividing the 2014 population of 22,634 by the 2014 housing stock of 4,086 dwelling units. An explanation should be provided for this discrepancy.

Response: 3.2.10-46: *The Average Family size of 5.9 persons per household is a published statistic by the US Census for the Village of Kiryas Joel. Documentation to support this is included on the 14th page of Appendix H. Average Family size is defined as the number of persons who live as a family, divided by the number of families. This number can vary from the total population. The DGEIS population projection assumes that a couple first starting out will have a family size of 2.0 persons and their family will grow to 5.9 persons over a period of 4 to 5 years.*

Comment 3.2.10-47: (Letter 77, Joanne P. Meder, AICP, Meder Consulting Services, June 22, 2015): It is recommended that average family size statistics be provided for the second and third sections of Table E-1 as well so that figures are also presented for the Town of Monroe under the 507-acre and the alternative 164-acre annexation scenarios. Using the data presented in Table E-1, those figures would appear to be 3.03 persons per dwelling unit in the Town of Monroe under the 507-acre annexation scenario and 7.41 persons per dwelling unit in the Town of Monroe under the 164-acre annexation scenario.

Response: 3.2.10-47: *As shown on Table E-1, Pages 2 and 3 of the table already provide a calculation of Average Family Size for the Town of Monroe and the Village of Kiryas Joel under both the With Annexation and Without Annexation scenarios, for both the 507-acre annexation and the 164-acre annexation alternatives, ranging from 5.1 persons to 5.5 persons.*

507 Acre Annexation:

On the annexation lands, in the Town of Monroe, ***Without Annexation****, it is projected that 7,356 persons will occupy 1,431 units which calculates to 5.1 persons per unit.*

On the annexation lands, in the Town of Monroe, ***With Annexation****, it is projected that 19,663 persons will occupy 3,825 units which calculates to 5.1 persons per unit.*

164 Acre Annexation Table ALT E-1:

On the annexation lands, in the Town of Monroe, ***Without Annexation****, it is projected that 4,642 persons will occupy 903 units which calculates to 5.1 persons per unit.*

On the annexation lands, in the Town of Monroe, ***With Annexation****, it is projected that 11,517 persons will occupy 1,952 units which calculates to 5.9 persons per unit.*

The commenter is mistaken about 3.03 and 7.41 persons per dwelling units referenced above.

Comment 3.2.10-48: (Letter 77, Joanne P. Meder, AICP, Meder Consulting Services, June 22, 2015): The fourth section of Table E-1 presents a future picture of Hasidic population growth in the Annexation Territory projected out by 10 years, noting that the Study Area will gain 19,663 people between 2015 and 2025, with or without any annexation, and those new people will require a total of 3,825 dwelling units. A comparison between those two figures reveals an

average household size of 5.14 persons per dwelling unit. If 5.9 persons per dwelling unit is the accurate figure to use for purposes of projecting future housing demand, then it is unclear why 3,825 new dwelling units would be needed by the Village of Kiryas Joel. Instead, it would seem that a total of 3,333 dwelling units would more than suffice (assuming the population projection of 19,663 is accurate to start with). Explain the discrepancy. None of the average household size figures identified on the second page of Table E-1 come close to the 5.9 person per dwelling unit figure that was cited elsewhere as the relevant figure to be used for determining how much housing demand would result from the projected population increase.

Response: 3.2.10-48: *The DGEIS population analysis is based upon an average family size of 5.9 persons for the new families that will be created by the current female students. Since it will take several years for a new family to become a family of 5.9 persons, an adjustment was included in the analysis to allow this growth to happen. The population projection assumes that a couple first starting out will have a family size of 2.0 persons and their family will grow to 5.9 persons over a period of years. In addition there are factors for mortality and in-migration, thus the calculation is not a straight line multiplication. If the actual population is reduced compared to the population projections, the related impacts and need for community services would be reduced compared to the projections contained in the DGEIS.*

Comment 3.2.10-49: (Letter 77, Joanne P. Meder, AICP, Meder Consulting Services, June 22, 2015): The second page of Table E-1 is intended to present the methodology that was used to distribute the anticipated new population between the Village of Kiryas Joel and the unincorporated portions of the Town that together constitute the Annexation Territory. However, no explanation is provided for why average household size is different for each of the individual scenarios presented on this page of Table E-1.

Response: 3.2.10-49: *The population was projected based upon an analysis of the number of female students by year times the average family size and includes annual factors for in-migration and mortality, resulting in a total projected population of 19,663 persons. As discussed earlier, it is logical to project that the average family size of 5.9 persons would take several years to achieve for the average couple. This analysis does not lend itself to a single mathematical calculation, but was derived in a series of spread sheets.*

Table E-1 shows the distribution of the projected population to the Town vs. the Village under the With and Without Annexation scenarios.

As described in the DGEIS, Page 3.2-6. Future development in the Town of Monroe, without annexation, according to current zoning was also reviewed in detail to derive the projected number of units that could be built under existing zoning, 1,431 units.

The Average Family sizes listed in Table E-1 are calculated by taking the projected population and dividing by the number of units expected to be built. As the factors vary, so do the results.

Comment 3.2.10-50: (Letter 77, Joanne P. Meder, AICP, Meder Consulting Services, June 22, 2015): The time horizon selected by the Project Sponsor for study of potential environmental impacts in this DGEIS was only 10 years and should have instead covered at least a 20-year time period.

Response: 3.2.10-50: *See Response 3.2.10-1 and Response 3.2.10-33.*