

3.3.9 County Services and Facilities Comments and Responses

Comment 3.3.9-1: (Letter 2, Steven Neuhaus, Orange County Executive, June 10, 2015):

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 services will increase the burden on the general taxpayer, and the county should expect to see a net spending increase.

Response 3.3.9-1: Although these funds are administered by the County, most of the funding for these services come from the Federal government. Since both the Town and the Village are within the jurisdiction of Orange County, whether the anticipated population lives in the Town or lives in the Village, the administration of funds would be the same. In any event, population growth is not caused by or an impact of annexation.

Comment 3.3.9-2: (Letter 2, Steven Neuhaus, Orange County Executive, June 10, 2015):

Early intervention evaluation and services: Both programs 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 Cost rise. It would be helpful to quantify whether that is occurring.

Response 3.3.9-2: Comment noted. Refer to Response 3.3.9-1. These anticipated increases in services and costs are related to population growth, not to annexation. Population growth is not caused by or an impact of annexation. Any such quantification is best addressed in another forum. From a generalized planning perspective, the projected population is essentially equal to the existing population so a doubling of current service levels would be a reasonable worst-case approximation. In addition, much of the funding for Early Intervention Services comes from the state government. The County would need to plan for this service expansion with or without annexation.

Comment 3.3.9-3: (Letter 2, Steven Neuhaus, Orange County Executive, June 10, 2015):

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 increase total population.

Response 3.3.9-3: Comment noted. These anticipated increases in services are related to population growth, not to annexation. Population growth is not caused by or an impact of annexation. Refer to Responses 3.3.9-1 and 3.3.9-2.

Comment 3.3.9-4: (Letter 2, Steven Neuhaus, Orange County Executive, June 10, 2015):

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.

Response 3.3.9-4: Comment noted. These anticipated increases in services and costs are related to population growth, not to annexation. Population growth is not caused by or an impact of annexation. However, new development associated with the naturally

occurring growth will generate substantial tax revenues to County agencies (see page 3.2-17 of DGEIS. Property tax revenue projections alone are in the neighborhood of \$4.6 million annually to the County if development occurs as projected, post annexation.

Comment 3.3.9-5: (Letter 2, Steven Neuhaus, Orange County Executive, June 10, 2015):

Medicaid: The total cost of NYS in 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 population is likely to have little or no impact on the Orange County Government's Medicaid burden if County Medicaid cost remain capped. If that changes, however, County cost could increase significantly.

Response 3.3.9-5: Comment noted. These anticipated increases in services and costs are related to population growth, not to annexation. Population growth is not caused by or an impact of annexation.

Comment 3.3.9-6: (Letter 2, Steven Neuhaus, Orange County Executive, June 10, 2015):

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

Response 3.3.9-6: Comment noted.

Comment 3.3.9-7: (Letter 2, Steven Neuhaus, Orange County Executive, June 10, 2015):

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

Response 3.3.9-7: Comment noted.

Comment 3.3.9-8: (Letter 2, Steven Neuhaus, Orange County Executive, June 10, 2015):

From 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 recording village transit operations and maintenance of federally-supported bus equipment.

Today 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.

Response 3.3.9-8: Comment noted. Refer to Responses 3.3.9.1 and 3.3.9-2.

Comment 3.3.9-9: (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015):

The DGEIS fails to address the existing conditions and potential impacts of the annexation on early intervention evaluations and services provided to children from birth to age 5, many of whom reside within the Village of Kiryas Joel. County program costs for early intervention include, but are not limited to: evaluation, transportation, respite, and related services.

Response 3.3.9-9: *Refer to Responses 3.3.9.1 and 3.3.9-2. These anticipated increases in services and costs are related to population growth, not to annexation. Population growth is not caused by or an impact of annexation.*

Comment 3.3.9-10: (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015): The DGEIS fails to address the county's programmatic costs associated with monitoring and issuing permits for children's camps; food service establishments; school food services at non-public schools; and swimming pools.

Response 3.3.9-10: *Refer to Responses 3.3.9.1 and 3.3.9-2. These anticipated increases in services and costs are related to population growth, not to annexation. Population growth is not caused by or an impact of annexation.*

Comment 3.3.9-11: (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015): There is a direct correlation between population density and infectious disease prevention and transmission (e.g. mumps). The increase in population forecast in the DGEIS will have the effect of increasing population density overall. Increases in direct costs associated with planning and monitoring immunization programs also need to be addressed.

Response 3.3.9-11: *As discussed in Responses 3.3.9.1 and 3.3.9-2. Population increase is not the "action" subjected to SEQRA. That will occur with or without annexation. Annexation is the proposed discretionary action under review. Without annexation, the likelihood of even higher density development within the existing Village boundaries increases.*

Comment 3.3.9-12: (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015): The DGEIS asserts that there will be no impact of the action on social service costs based upon two assumptions. First, the DGEIS asserts that the net population increase will be negligible as the annexation only affects the location of population growth, not the net increase. As noted above, however, the assertion that total population growth will be identical with or without annexation is not well supported. Acknowledging that the annexation option enables more rapid and greater population growth, the DGEIS should address the potential implications of increased service demand. These impacts will be even greater if a more realistic planning horizon (e.g. through 2040) is adopted in revisions to the DGEIS.

Response 3.3.9-12: *Population growth in the Village in recent times has been largely a function of births, not in-migration. The Village monitors the number of young women living in the municipality and has found a high correlation in population growth specifically connected to that segment of its population. Young female residents generally marry by age 18 to 20 and stay to reside and establish their families in Kiryas Joel. The rate of births is unlikely to be hastened by annexation.*

The DGEIS contains useful demographic information that makes it easy for county planning to ascertain potentially needed services beyond the ten year time frame reviewed in the DGEIS. However, again, this growth is not an impact of annexation and examining it further is best done in another forum.

Comment 3.3.9-13: (Letter 54, David E. Church, AICP, Commissioner, Orange County Department of Planning, June 22, 2015): Second, the DGEIS notes that the largest components of social service costs—particularly Medicaid and Supplemental Nutrition Assistance (SNAP), are funded by state and federal taxpayers or, as in the case of Temporary Assistance to Needy Families and many other county services are not used by residents of the Village of Kiryas Joel. Although the fact that program costs are currently funded by state and federal taxpayers does not mean that there are no impacts on county taxpayers, as Orange County administers these programs. This funding assumption is used in the DGEIS to avoid the obligation to forecast future social service costs, including administrative and indirect expenses.

***Response 3.3.9-13:** This comment appears contradictory to the comment by the County Executive at 3.3.9-6. These anticipated increases in administrative costs are related to population growth, not to annexation. Population growth is not caused by or an impact of annexation.*

Comment 3.3.9-14: (Letter 77, Joanne P. Meder, AICP, Meder Consulting Services, June 22, 2015): Potential Impacts - Other Public Services: The DGEIS fails to adequately address potential impacts on "Orange County Social Services." In fact, the DGEIS includes the unsupportable statement that "there will be no difference in the cost or availability of County Services as a result of annexation." The pertinent issue is not whether a particular amount of growth will or will not occur in the Study Area. It is whether the County will be equipped to address all of the new requests for assistance, resulting from the projected population growth. If the DGEIS provides a proper analysis of potential environmental impacts, the County will be better equipped to plan for any needed expansion of its services when and as needed.

***Response 3.3.9-14:** The DGEIS contains useful demographic information that makes it easy for the county to carry out planning studies for services beyond the ten year time frame reviewed in the DGEIS. However, again, this growth is not an impact of annexation and examining it further is best done in another forum.*

Comment 3.3.9-15: (Letter 77, Joanne P. Meder, AICP, Meder Consulting Services, June 22, 2015): Page 3.3-17- Section 3.3.5 -Potential Impacts - Other Public Services (cont' d): At the end of this page, the DGEIS includes a statement indicating that "the residents of Kiryas Joel do not typically utilize many other available County services. As a result, it would appear that any higher proportionate reliance on Medicaid and SNAP is offset by the lower proportionate use of these other programs so as to not reflect a disproportional reliance on County social services or depletion of Orange County tax resources." It not the job of the Project Sponsor, however, to weigh and balance potential environmental impacts and trade one off for another so that a "no impact" conclusion can be justified. Instead, the DGEIS should include the data needed to quantify the projected usage of County services in relation to the cost of providing those services so that the potential impacts associated with the projected population growth can be evaluated, and the Lead Agency can then fulfill it duty to "weigh and balance relevant environmental impacts with social, economic and other considerations" as part of the formulation of its SEQRA Findings on the Proposed Action.

***Response 3.3.9-15:** Any increase in the need for County Services or Federal and State services administered by Orange County would be related to population growth, not to annexation. Refer to Responses 3.3.9-1, 3.3.9-2, and 3.3.9-3.*