

STATE OF MINNESOTA OFFICE OF ADMINISTRATIVE HEARINGS MUNICIPAL BOUNDARY ADJUSTMENT UNIT

OAH/MBAU Docket No.: A-8423

In the Matter of City of Glenwood/Glenwood Township (Jeffrey and Tammie Pahan (PID 09-0249-000) and Lloyd and Kathryn Pahan (PID 09-0248-001))

OBJECTION TO ANNEXATION

PLEASE TAKE NOTICE:

1. In accordance with Minnesota Statutes, section 414.03, subd. 3, Glenwood Township ("Town") objects to the proposed annexation of the following parcels by the City of Glenwood ("City") ("Subject Property"):

| <u>PID</u> | Physical Address | Property Owner |
|-------------|--|--------------------------|
| 09-0249-000 | 17188 210 th Avenue Glenwood, MN 56334 | Jeffrey and Tammie Pahan |
| 09-0248-001 | 17162 210 th Avenue Glenwood, MN 56334 | Lloyd and Kathryn Pahan |

- 2. The Town affirmatively denies that (1) the Subject Property is now, or is about to become, urban or suburban in character, (2) municipal government in the area proposed for annexation is required to protect the public health, safety, and welfare, or (3) the annexation would be in the best interest of the subject area.
- 3. The Town affirmatively alleges that (1) the increase in revenues for the annexing municipality bears no reasonable relation to the monetary value of benefits conferred upon the Subject Property, (2) annexation of all or a part of the Subject Property to the City would better serve the interests of the residents of the Subject Property and (3) the remainder of the Town would suffer undue hardship.

WHEREFORE, the Town respectfully requests that the City's proposed annexation of the Subject Property be denied.

KENNEDY & GRAVEN, CHARTERED

Dated: February 22, 2023 By: /s/ Jason M. Hill

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