KEYSTONE ASSOCIATES
ARCHITECTS | ENGINEERS | SURVEYORS

Town of Highland
Planning Board Meeting

August 23, 2023

Camp FIMFO Catskill
SEQRA Process Summary
(from February 2, 2023)

1. February 2, 2023 Planning Board Received a revised Full EAF, Part 1 with a report.

2. Planning Board completed "Part 2 – Identification of Potential Project Impacts". Responses to the following questions received the most discussion and require confirmation of the response.

    1. Impact on Land
        (d) removal of material – **Small Impact**

    4. Impact on Ground Water
        (a) additional demand on existing wells – **Small Impact**

    9. Impact on Aesthetic Resources
        (c) visible from publicly accessible vantage points – **Small Impact (moderate?)**
        (d) viewing – **Small Impact (moderate?)**

    13. Impact on Transportation
        (a) Projected traffic increase – **Small Impact (moderate?)**

    15. Impact on Noise, Odor and Light
        (a) Noise levels – **No Impact**

    17. Consistency with Community Plans
        The proposed action is not consistent with adopted land use plans. – **No.**

    18. Consistency with Community Character
        The proposed action is inconsistent with the existing community character – **No.**

3. Keystone drafted a proposed "Part 3 – Evaluation of the Magnitude and Importance of Project Impacts and Determination of Significance" for the board's consideration. The draft includes a Part 3 Addendum provided by the Applicant.

4. Planning Board will vote via a roll call regarding the Determination of Significance.

5. A resolution will be prepared based upon the Determination of Significance for board vote.

Agency Use Only [IfApplicable]

Project :

Date :

Full Environmental Assessment Form
Part 3 - Evaluation of the Magnitude and Importance of Project Impacts
and
Determination of Significance

Part 3 provides the reasons in support of the determination of significance. The lead agency must complete Part 3 for every question in Part 2 where the impact has been identified as potentially moderate to large or where there is a need to explain why a particular element of the proposed action will not, or may, result in a significant adverse environmental impact.

Based on the analysis in Part 3, the lead agency must decide whether to require an environmental impact statement to further assess the proposed action or whether available information is sufficient for the lead agency to conclude that the proposed action will not have a significant adverse environmental impact. By completing the certification on the next page, the lead agency can complete its determination of significance.

Reasons Supporting This Determination:

To complete this section:

- Identify the impact based on the Part 2 responses and describe its magnitude. Magnitude considers factors such as severity, size or extent of an impact.
- Assess the importance of the impact. Importance relates to the geographic scope, duration, probability of the impact occurring, number of people affected by the impact and any additional environmental consequences if the impact were to occur.
- The assessment should take into consideration any design element or project changes.
- Repeat this process for each Part 2 question where the impact has been identified as potentially moderate to large or where there is a need to explain why a particular element of the proposed action will not, or may, result in a significant adverse environmental impact.
- Provide the reason(s) why the impact may, or will not, result in a significant adverse environmental impact
- For Conditional Negative Declarations identify the specific condition(s) imposed that will modify the proposed action so that no significant adverse environmental impacts will result.
- Attach additional sheets, as needed.

As set forth in Part 2 of the EAF and the attached Part 3 Addendum, the proposed action will not likely have a significant environmental impact.

Determination of Significance - Type 1 and Unlisted Actions

SEQR Status: ☑ Type 1 ☐ Unlisted

Identify portions of EAF completed for this Project: ☑ Part 1 ☑ Part 2 ☑ Part 3

Camp FIMFO Catskills
3854 NYS Route 97
Town of Highland
FULL ENVIRONMENTAL ASSESSMENT FORM (FEAF) PART 3 ADDENDUM
Evaluation of the Magnitude and Importance of Project Impacts

(Potential Impacts Identified in FEAF Part 2)

INTRODUCTION

This Part 3 analysis has been prepared to address all relevant areas of environmental concern as identified by the Planning Board in the Part 2 EAF. This EAF Part 3 is based upon all of the presentations made to the Planning Board, including written materials and presentations at Board meetings, as well as comments and responses to Board members' questions, and comments of the Town consultants.

DESCRIPTION OF ACTION

The Applicant and Owner, Sun NG Kittatinny RV LLC, managed by Northgate Resorts and Sun Communities, is seeking site plan and special use permit approval from the Town of Highland Planning Board for improvements to an existing, seasonally-operational campground (formerly known as the Kittatinny Campgrounds and Canoes – Barryville Base). The campground is located at 3854 NYS Route 97[1] amongst an approximately 235-acre site in the hamlet of Barryville in the Town of Highland, Sullivan County, NY. The project site is split zoned between the H-C (Hamlet Commercial) and R-2 (Residential Agricultural) zoning districts.

The campground has been in operation since around 1941 and was acquired by Northgate Resorts in 2020. The campground is open April – October. The campground currently includes 342 camp sites split into ten distinct areas (e.g., campsites 100s – 1000s) with the campsites clustered to the west and north of the site, leaving the eastern portion of the property for hiking trails, zipline, and paintball (see Sheet C002 for the overall site plan). A welcome center area (that contains check in, office, retail), camp store, maintenance buildings, and a pole barn are located off NYS Route 97. There are three bathhouses[2] serving the campsites, several storage buildings, and a building used for the office. There are also two existing residences on site. The campground has existing Delaware River access. River riders that shuttle to points north and south will return with canoes to the camp's river area. The 900s campground sites are located in the river area as well. The 700s and 800s campsites are located west of the overall campground area, west of Dry Brook Road.

As part of the proposed project, three accesses will be provided to the main campground area off the north side of NYS Route 97. One access will be provided to the river activities area and campground area of the south side of NYS Route 97. The existing access east of Beaver Brook will also remain providing access to the less developed northeastern area of the campground, north of SR 97. In total, two existing accesses will be removed, including one access north of NYS Route 97 and one south. Gravel pedestrian paths will be provided.

As part of the proposed project, the overall number of campsites would be reduced from 342 to 339 campsites with a reduction in occupancy from 2,838 to 2,354 people. Several old and underutilized structures would be demolished. The existing welcome center would be replaced with a new building at the same location. The two maintenance buildings would be demolished and replaced with a single new building with laundry facilities (4 washers/4 dryers) in a new location. The camp store use would be converted to a food and beverage facility, the bathhouses would continue to provide services for campsites, and the storage buildings would continue to be used for storage. In addition, a new aquatic play area and mini-golf course area would be constructed in the welcome center area.

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[1] Tax parcels 25.-1-4.1, 23.-1-6, 25.-1-5.1, 25.-1-5.2, 25.-1-9.2, 25.-1-9.1, 25.-1-15, 25.-1-4.4, 25.-1-4.3, and 25.-1-4.2 are owned by Sun Ng Barryville RV LLC. Tax parcel 25.-1-8 is owned by related Sun Ng Lot 8 RV LP, 27777 Franklin Rd, Ste. 200, Southfield, MI 48304. No project improvements are proposed for the parcels located west of Dry Brook Rd. (25.-1-15, 25.-1-4.3, 25.-1-4.2) and on the river side farther east (25.-1-6.1, 25.-1-7), which are also owned by the Applicant.

[2] Bathhouse – Central (200s): serves – portion of 100s, all of 200s, portion of 500s, portion of the 1000s former RV sites on field; Bathhouse – East (300s): serves – all of 300s, 400s, portion of 500s, 1000s; Bathhouse - West (100s): serves – portion of the 100s, all of 600s, all of 900s.

Improvements are proposed to existing wastewater collection and treatment facilities and for the construction of new septic disposal systems (SSDS). Currently, the campground has several existing SSDS, some State permitted, and others Town permitted. Improvements are also proposed to well and water supply infrastructure and stormwater management facilities. There are six existing State public water supply permitted wells. Upgrades will be undertaken to electrical infrastructure, landscaping and fencing, solid waste collection infrastructure, and roads. A total 286 parking spaces are provided, including 120 spaces provided as grass parking.

Currently, the campground employs a total of 46 employees (part-time and full-time). With the improvements, Camp Fimfo will result in 89 new full-time equivalent (FTE) jobs.

As a result of the comprehensive review undertaken by the Planning Board, the project has been modified to address various issues, including but not limited to, the Applicant's decision to remove the proposed mountain coaster from the proposed project. With the removal of the mountain coaster, the Applicant addressed concerns related to impacts on land (reducing the amount of clearing), impacts on plants and animals ((reducing the amount of clearing), and impacts related to noise (potential for operational noise).

As demonstrated below, the project results in no significant adverse impacts to environmental resources.

1.0 POTENTIAL IMPACT #1 - IMPACT ON LAND

Proposed action may involve construction on, or physical alteration of, the land surface of the proposed site.

Part 2 FEAF 1.a. The proposed action may involve construction on land where depth to water table is less than 3 feet.

The proposed project requires an area of disturbance of 41.5 acres. The project site has 18 different soil types. The following table summarizes the most common soils expected to be found on the project site according to Geographic Information Systems (GIS) information and the USDA Natural Resources Conservation Service website. As part of the proposed project, extensive soil testing has been completed to inform wastewater design, stormwater design, building and other structural designs. On the northeast portion of the property, the soil testing and evaluation revealed some limiting conditions such as bedrock and seasonal groundwater weeping. Limiting conditions, such as shallow bedrock and groundwater, were generally found at approximately 30"- 48" below grade. The table below provides information on dominant soil types found on site.

Dominant Soil Types in Project Site

Soil Symbol	Soil Name	Percent of Study Area	Depth to Bedrock (ft.)	Depth to Water Table (ft.)	Representative Slope (percent)	Drainage Class
AIC	Arnot-Lordstown complex, 0 to 15% slopes, very rocky	20.2	1.4	>6.6	8	Somewhat excessively drained
AIE	Arnot-Lordstown complex, 15 to 35% slopes, very rocky	12.5	1.4	>6.6	25	Somewhat excessively drained

Soil Symbol	Soil Name	Percent of Study Area	Depth to Bedrock (ft.)	Depth to Water Table (ft.)	Representative Slope (percent)	Drainage Class
ArF	Arnot-Rock Outcrop complex, 35 to 70 % slopes	16.1	1.4	>6.6	53	Somewhat excessively drained
SwE	Swartswood and Lackawanna soils, steep, extremely stony	9.4	2.2	1.8	26	Well drained
Pp	Pope very fine sandy loam, rarely flooded	7.6	>6.6	>6.6	1	Well drained
RhA	Riverhead sandy loam, 0 to 3 percent slopes	7.1	>6.6	>6.6	1	Well drained

The proposed project will include construction of a new welcome center in the same location as the previous building and a new maintenance building to replace two existing buildings, which will be demolished. The construction of these two buildings is not proposed in areas where there is high groundwater. The new temporary dwelling features are proposed at existing campsites, including those campsites relocated to the mountainside area to the northeast. These structures are located above the ground and will not conflict with high groundwater areas or bedrock conditions. The proposed improvements to water and electric utility improvements will be constructed utilizing engineering best practices should groundwater be encountered during construction. Stormwater management practices and subsurface septic systems are designed according to applicable NYSDEC and NYSDOH regulations, which require separation distances between water resources and infrastructure. For these reasons, no significant adverse impacts related to high groundwater will occur.

Part 2 FEAF 1.b. The proposed action may involve construction on slopes of 15% or greater.

The northeastern portion of the project site, approximately 38% of the project site, exhibits steep slopes greater than 15%. Campsites on the project site are already existing, with the exception of those proposed for the mountainside area. The temporary dwelling structures are proposed for areas where the natural contour of the land is less than 15% slope, with little to no grading proposed. Minor slopes can be accommodated by manipulating the platform structures. Approximately 2.19 acres with greater than 15% slope will be encountered during construction for widening of the existing roadway and installation of the utilities, including required clearances between lines. Erosion and sediment control measures as stipulated in the NYSDEC 2016 Standards and Specifications for Erosion and Sediment Control will be implemented and are shown on the project plans.

Part 2 FEAF 1.c. The proposed action may involve construction on land where bedrock is exposed, or generally within 5 feet of existing ground surface.

Part 2 FEAF 1.d. The proposed action may involve the excavation and removal of more than 1,000 tons of natural material.

The project site is located in the Southern Catskills Mountain region situated along the historic Delaware River. According to the NYS Museum, the project site's bedrock formation is primarily upper Walton Formation (including shale, sandstone, conglomerate), and the surficial geology is Till, with shallow bedrock located at less than five feet from the ground surface.

As described above, major grading will not be undertaken for the installation of the new temporary structures. The road widening and utility installations will require excavation, including rock removal. Based on information received from the Applicant's construction contractors, a combination of

trenching machines, excavators (ripping and hydraulic hammering) will be utilized. No blasting is proposed. For road widening and utility trenching, the trenching machine would likely be used. For stormwater practices, the aquatic area, building foundations/footings and retaining walls ripping by excavators and hydraulic hammering will likely be needed.

The contractor will utilize the following best practices to reduce nuisance related to rock removal.

- Trucks and other vehicles used to transport particulate matter will be covered, and any particulate matter kept on site shall be sufficiently wetted or stored to prevent particulate matter from becoming airborne.
- Portable hand water sprinklers or hose sprinklers will be used for dust control. Water sprays or jets will be designed to break the water stream into small droplets or otherwise to provide effective wetting.
- Suitable drainage means will be provided for the removal of water and sludge that drains from the operation.
- Soil or debris piles will be moistened if dust is being emitted from the piles. Adequately secured tarps, plastic or other material may be used to further reduce dust emissions.

Greater than 1,000 tons of natural material, including rock, may be removed to improve the campground, modernize utilities and improve the roadways. To limit off-site natural material removal, excess natural material is to be used to level out existing campsite to provide level pads. These areas will be graded out to keep stormwater flow patterns consistent with proposed conditions. Excess material will not be used for any campsite or any area within the 100-year floodplain.

Part 2 FEAF 1.f. The proposed action may result in increased erosion, whether from physical disturbance or vegetation removal (including from treatment by herbicides).

The project will disturb more than one acre and create stormwater runoff. Currently, there are no stormwater management practices at the campground. With the improvement project, stormwater will be directed to on-site stormwater management facility/structures, including bioretention areas using a swale, infiltration and underdrains. A Four-Bay system and grass filter strips with pea gravel diaphragms will be used for pretreatment. One practice will drain to the Canal and on to Beaver Brook and the three remaining practices will drain to a 5th Order Stream: Delaware River.

The Applicant will seek coverage under the State Pollutant Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Construction Activity. A Stormwater Pollution Prevention Plan has been prepared in conformance with the most current New York State Stormwater Management Design Manual and New York State Standards and Specifications for Erosion and Sediment Control. An Erosion and Sediment Control Plan will be provided and employed during the construction phase to protect off-site waters from the adverse effects of sedimentation and erosion.

Based on this information, the proposed project will not result in significant adverse impacts on land.

2.0 POTENTIAL IMPACT #3 – IMPACT ON SURFACE WATER

The proposed action may affect one or more wetlands or other surface water bodies (e.g., streams, rivers, ponds or lakes).

Part 2 FEAF 3.e. The proposed action may create turbidity in a waterbody, either from upland erosion, runoff or by disturbing bottom sediments.

Part 2 FEAF 3.h. The proposed action may cause soil erosion, or otherwise create a source of stormwater discharge that may lead to siltation or other degradation of receiving water bodies.

The project will disturb more than one acre, which requires coverage under the New York State Department of Environmental Conservation's (NYSDEC) General Permit for stormwater discharges

during construction activities. Accordingly, a stormwater pollution prevention plan (SWPPP) will be implemented. Stormwater will be directed to on-site stormwater management facility/structures, including bioretention areas using a swale, infiltration and underdrains. A Four-Bay system and grass filter strips with pea gravel diaphragms will be used for pretreatment. A SWPPP has been prepared in conformance with the most current New York State Stormwater Management Design Manual and New York State Standards and Specifications for Erosion and Sediment Control. An Erosion and Sediment Control Plan will be provided and employed during the construction phase to protect off-site waters from the adverse effects of sedimentation and erosion.

Part 2 FEAF 3.i. The proposed action may affect the water quality of any water bodies within or downstream of the site of the proposed action.

The proposed project will not alter or encroach on any aquatic resources.

The Delaware River, a Class A waterbody, flows along the southern boundary of the project site. Two other mapped waterbodies are Class B(T) streams (815-284 and 815-298). Seven wetlands were delineated within the project site in April 2022, consisting of five Palustrine Emergent wetlands, one Palustrine Forested wetland, and one Palustrine Scrub-Shrub wetland. The project site contains approximately 2 acres of freshwater wetlands. See the table below for a list of delineated wetlands on the project site.

Delineated Wetlands

Wetland ID	Cowardin Classification	Acreage On-site	Latitude, Longitude (NAD83)	Jurisdiction
Wetland 1	PEM	0.08	41.487, -74.951	USACE
Wetland 2	PEM	0.59	41.486, -74.952	USACE
Wetland 3	PEM	0.08	41.486, -74.954	USACE
Wetland 4	PSS	0.13	41.483, -74.953	USACE
Wetland 5	PFO	0.86	41.483, -74.953	USACE
Wetland 6	PEM	0.23	41.481, -74.951	USACE
Wetland 7	PEM	0.01	41.477, -74.962	USACE

In addition, seven streams, consisting of two perennial streams, and five intermittent streams, were delineated within the project site. See the table below for a list of delineated streams on the project site.

Delineated Streams

Stream ID	Flow Regime/Stream Order	NYSDEC Class	Stream Length/Width in Study Area (lf)	Stream Bed Substrate	Latitude, Longitude (NAD83)	Jurisdiction
River 1	Perennial/7th	A	3,435/350	Cobble, gravel, sand, silt	41.479, -74.951	NYSDEC, USACE
Stream 1	Perennial/1st	B(T)	3,500/25	Boulder, cobble, gravel, bedrock	41.483, -74.951	NYSDEC, USACE

Stream ID	Flow Regime/Stream Order	NYSDEC Class	Stream Length/Width in Study Area (lf)	Stream Bed Substrate	Latitude, Longitude (NAD83)	Jurisdiction
Stream 2	Intermittent/1st	Unclassified	450/3	Cobble, gravel	41.486, -74.952	USACE
Stream 3	Intermittent/1st	Unclassified	580/6	Boulder, cobble, gravel	41.485, -74.954	USACE
Stream 4	Intermittent/1st	Unclassified	485/10	Boulder, cobble, gravel	41.488, -74.948	USACE
Stream 5	Intermittent/1st	Unclassified	820/3	Gravel, silt	41.481, -74.953	USACE
Stream 6	Perennial/1st	B(T)	290/12	Boulder, cobble, gravel	41.478, -74.958	NYSDEC, USACE
Stream 7	Intermittent/1st	Unclassified	540/5	Cobble, gravel	41.484, -74.954	USACE
Ditch 1	Ephemeral	Unclassified	435/2.5	Silt	41.481, -74.954	Potentially Non-Jurisdictional

Wetlands 1 through 7, Streams 1 through 7, and River 1 are USACE jurisdictional wetlands. In addition, Stream 1 and Stream 6, along with River 1, are NYSDEC classified streams and these streams, along with their bed and bank, are regulated by NYSDEC. None of the water bodies are listed as NYS water quality-impaired bodies. As stated above, no encroachment or discharge of fill into aquatic resources is proposed and no aquatic resource permits are required. With the implementation of the SWPPP, no waterbodies will be adversely impacted by the proposed project.

Part 2 FEAF 3.j. The proposed action may involve the application of pesticides or herbicides in or around any water body.

Pest control is currently and will continue to be applied by licensed applicators using minimal levels of application. Based on this information, the proposed project will not result in significant adverse impacts on surface waters.

3.0 POTENTIAL IMPACT #4 – IMPACT ON GROUNDWATER

The proposed action may result in new or additional use of ground water, or may have the potential to introduce contaminants to ground water or an aquifer.

Part 2 FEAF 4.a. The proposed action may require new water supply wells or create additional demand on supplies from existing water supply wells.

The project will create a new demand for water. The total anticipated usage per day is anticipated to be less than 35,000 gallons, which would be supplied by the site's existing six public water supply permitted wells. No new wells are proposed as part of the proposed project. There are several existing treatment systems within the property. In general, the water system is supplied off the well pumps with no storage or true distribution pumps. Disinfection is achieved by use of chlorine injection and a chlorine contact tank at each well location. With the proposed project, the water system will be modernized and improved. The water storage and treatment system will be improved at a total of 5 existing well locations to include a new water treatment building, larger storage tanks, and new

chlorination equipment and distribution pumps which will improve system pressure. New water distribution lines are also being installed throughout the project. Every campsite is proposed to have a water hook-up or water available. The distribution mains are looped to the greatest extent possible. The mains will generally be run within the roadway corridor to minimize impacts to the site.

Part 2 FEAF 4.b. Water supply demand from the proposed action may exceed safe and sustainable withdrawal capacity rate of the local supply or aquifer.

A hydrogeological study by Miller Hydrogeologic Incorporated was completed on December 8, 2022. The purpose of the study was to address the potential for well interference as a result of the proposed project. The closest neighboring well to the northwest of the site is approximately 500 feet, to the northeast of the site is approximately 1,200 feet, and to the southeast of the site is approximately 3,000 feet. The ability of any individual well to supply water is not only dependent on the aquifer's hydraulic properties but also its relation to any other recharge boundaries which can serve as a constant source of water other than the surrounding groundwater flow system. The Delaware River serves as a recharge boundary to groundwater flow within the local valley flow system and any groundwater that would flow to the proposed project wells would be coming from the direction of the Delaware River as induced infiltration and not the lateral or upland areas surrounding the project site to the northeast, northwest and southeast. The hydrogeological analysis evaluated four (4) wells on the project site to determine if their use would affect surrounding groundwater levels. Well interference theory states that the drawdown observed in one well due to pumping of a second well at any distance away is dependent on the aquifer properties at and between each well location. The potential for well interference is best observed as an additional drawdown in a pumping well which cannot be directly attributed to the individual well's pumping. Well interference indicates that if a first well pumping can affect water levels in a second well then when the second well pumps it will correspondingly affect the water levels in the first well. Based on the testing and analysis, it was concluded that the project's groundwater use will have little impact on the surrounding groundwater levels. Therefore, no significant adverse impacts to the local groundwater supply or aquifer will occur as a result of the proposed project.

Part 2 FEAF 4.d. The proposed action may include or require wastewater discharged to groundwater.

The project site is located on the Delaware River Streamflow Zone/New Jersey Coastal Plains Aquifer Sole Source Aquifer, which serves as drinking water supply.

The proposed project will generate approximately 29,080 gallons per day of wastewater from bathrooms, showers, sinks, food service, laundry facilities, and the aquatic center.

Soil testing has been completed across the site and soils are suitable for conventional in-ground systems. Each system will include a gravity collection system connecting to a central septic tank (or tanks), pump station and forcemain to an Eljen Geotextile Sand Filter System. The Eljen system provides a higher level of treatment than traditional leach lines or absorption beds further protecting natural resources. In addition, the area needed for Eljen systems is smaller reducing the number of trees that will need to be removed. On the northeast portion of the property, the soil testing and evaluation revealed some limiting conditions such as bedrock and seasonal groundwater weeping. These limiting conditions in the area of the proposed systems were generally down about 30"- 48" below grade. Given this, Shallow Trench Eljen GSF systems are proposed in these areas.

The site has many environmental considerations that impact the location of on-site wastewater systems including areas with steep slopes, water bodies (rivers and streams), wetlands and floodplains. All of these critical environmental factors have been considered through the design process. The proposed systems are all an appropriate distance from these features. For example, the proposed Eljen absorption systems will be a minimum of 200 FT from existing water wells and a 100 FT buffer is maintained between the existing wells and the proposed septic tanks and pump stations. Moreover, the utilization of multiple on-site systems effectively spreads the wastewater out over a larger area. It was determined with the regulatory agencies that this method was preferred over one

large centralized system or any type of system that would use a surface water discharge. All of the proposed systems utilize sub-surface discharge of the wastewater. Finally, each system will include a gravity collection main which will primarily be run down the roadway corridor to minimize impacts to the site. The sewer mains will be a minimum of 10' horizontally from the water mains.

Part 2 FEAF 4.f. The proposed action may require the bulk storage of petroleum or chemical products over ground water or an aquifer.

The campground currently stores and will continue to store the following products: Chlorine (1,000 gallon AST), gasoline (500 gallon AST), and diesel (500 gallon AST). Volumes per unit time will vary. Gasoline is filled 1/week during open season and every two weeks during off season; Diesel is filled 1/week during open season and not used during off season; Chlorine is filled monthly during open season and not during off season. All bulk storage includes secondary containment. The aquatic center will use Calhypo for sanitizer which is a solid chlorine brick kept in sealed five-gallon buckets which double as storage devices in the mechanical room for the aquatic area. For pH buffer, 15 gallon containers are supplied as needed by the chemical supplier. With these precautions in place, no significant adverse impacts to ground water or the aquifer will occur.

Based on this information, the proposed project will not result in significant adverse impacts on groundwater.

4.0 POTENTIAL IMPACT #5 – IMPACT ON FLOODING

The proposed action may result in development on lands subject to flooding.

Part 2 FEAF 5.b. The proposed action may result in development within a 100-year floodplain.

Part 2 FEAF 5.c. The proposed action may result in development within a 500-year floodplain.

Part 2 FEAF 5.d. The proposed action may result in, or require, modification of existing drainage patterns.

Part 2 FEAF 5.e. The proposed action may change flood water flows that contribute to flooding.

According to the FEMA Firmette Floodplain Mapper, part of the project site is located within the FEMA 100-year (or special flood hazard area) and 500-year floodplains. The section of the project closest to the river is located within Zone AE. The area surrounding stream 815-284 is located within Zone A.

The existing campground currently occupies the special flood hazard area (SFHA) with parking, buildings, RV and tent sites, septic systems, wells, electric infrastructure and storage. The proposed project removes two building (these are the existing maintenance buildings to be demolished) and replaces them with a new single building outside the SFHA. The new welcome center building is located generally in the same location as the existing building. As part of the improvement project, the parking areas and vehicular design is updated to allow for improved safety and circulation. The parking areas are generally in the same location as they are presently, and the updated access and internal drives are improved for check-in/check-out driver behaviors and widened for improved emergency access. A modernized aquatic area, including two pools and slides and a filter building, will be constructed in the SFHA and a mini-golf area will adjoin this area. The project will result in 298 cubic yards of fill within the SFHA, which is considered a deminimis impact. No work will occur within the floodway.

Buildings located within the SFHA will have the lowest floor elevation located two feet above the established base flood elevation (BFE). The Applicant will obtain a Town of Highland floodplain development permit. Additionally, the project will comply with the special use permit standards for floodplain development set forth in Town Code § 190-73 (D)(6).

Some RV and tent campsites are currently located within the SFHA and these will remain. The temporary dwelling structures (RV) are secured to a trailer framework and the wheels remain intact.

Towing connections are stored within each trailer so that the units can be hitched to a tow vehicle and moved to safety during emergencies.

The existing campground has operated since the 1940s with campsites and other campground operations located with the SFHA. The proposed project will improve the site's vehicular circulation, will raise buildings above the BFE, will improve stormwater management, and will install waterproof caps and backwater valves on utility infrastructure, as necessary. In addition, the facility will take the necessary precautions ahead of flooding events, including –

- Overall
  - Reduce water use.
  - Remove loose items and tie down anything that cannot be removed to a safer area.
  - Safeguard electrical equipment.
- Temporary dwelling units
  - Tow temporary dwelling units out of the SFHA.
- Wells
  - Water pumps and other related systems will be shut down.
  - Wrap the cap and well casing with durable sheet plastic and duct tape, then place sand bags around the wells.
  - Make sure the well has a tight-fitting waterproof cap.
  - Ensure that the land surrounding the well is sloped away.
  - Plug the vent holes.
- Septics
  - Ensure that backflow prevention valves are in place.
- Aquatic Area
  - Move inventory to a secure area above the anticipated flood level, including disinfection chemicals and supplies used in the operation; filter media; furniture; life jackets; flotation mats and boards; and any other portable equipment or items.

As described, no significant adverse impact related to flooding will occur.

5.0 POTENTIAL IMPACT #7 – IMPACT ON PLANTS AND ANIMALS

The proposed action may result in a loss of flora or fauna.

Part 2 FEAF 7.a. The proposed action may cause reduction in population or loss of individuals of any threatened or endangered species, as listed by New York State or the Federal government, that use the site, or are found on, over, or near the site.

Part 2 FEAF 7.b. The proposed action may result in a reduction or degradation of any habitat used by any rare, threatened or endangered species, as listed by New York State or the federal government.

Part 2 FEAF 7.f. The proposed action may result in the removal of, or ground disturbance in, any portion of a designated significant natural community.

Part 2 FEAF 7.g. The proposed action may substantially interfere with nesting/breeding, foraging, or over-wintering habitat for the predominant species that occupy or use the project site.

Part 2 FEAF 7.h. The proposed action requires the conversion of more than 10 acres of forest, grassland or any other regionally or locally important habitat.

Part 2 FEAF 7.i. Proposed action (commercial, industrial or recreational projects, only) involves use of herbicides or pesticides.

The United States Fish and Wildlife (USFWS) Information for Planning and Consultation (IPaC) report for the proposed project identified two federally listed species which may exist in the vicinity of the project site – the dwarf wedgemussel, an endangered species and the northern long-eared bat (NLEB), a species that is currently listed as threatened under a 4(d) rule.[3] Additionally, the NYSDEC indicates that the bald eagle, a threatened species, may be located in the vicinity of the project site. LaBella has submitted protected species screenings to the pertinent agencies and consultations with these agencies are underway.

Dwarf wedgemussel habitat is found within the Delaware River. No changes to the Delaware River are proposed from this project, and the project will retain water quality through improvements in stormwater runoff. Therefore, no impacts to the Dwarf Wedgemussel are proposed.

Northern long-eared bat. The project proposes to remove 14.6 acre of forest area and convert that into seven acres of roads, buildings or other paved or other impervious surfaces as well as 7.6 acre of lawn/landscaped area. Approximately 91% of the wooded habitat will be preserved. In order to ensure no take of the species, given the change in the species status after March 31, 2023, tree removal will occur during the inactive season for the bat, from October 1 to March 31. Further, the Applicant will consult, as needed with the USFWS to confirm that on-site habitat removal is insignificant, given the coverage of similar forested areas within 2.5 miles of the site.

Bald eagle. By NYSDEC letter dated October 6, 2022, the NYSDEC identified that the project site overlaps a bald eagle wintering area along the Delaware River and is within 0.4 mile of a documented bald eagle nest in Pennsylvania. This nest is southwest of the site, per informal consultation with the NYSDEC; the exact location of the nest has not been provided. In the October 6, 2022 letter, the NYSDEC requested additional information to determine if there will be adverse impacts to the bald eagle. The NYSDEC requested information on the following:

- The proposed timing and location of blasting and other extremely loud activities. The project does not anticipate blasting for construction. Hydraulic hammering is not anticipated to have an impact on the bald eagle because it is located behind two topographic ridges located between the river and the proposed activity; and because the proposed activity is in the northeast portion of the project site more than a mile from the nest location.

- Details of project activities that are proposed to take place within 660 feet of the River between December 1 and March 31 of any year. No significant outdoor project activities are proposed to take place between December 1 and March 31 of any given year. The camp is closed during this period each year. The only activities may be plowing of roads and parking areas and general vehicular movement into paring areas north of Route 97. Construction of new facilities within these limits would occur from April 1 through November 31. The campground is open for recreational activities from April 28 through October 29 most years.

- Tree Removal: The NYSDEC recommended as a guideline to maintain bald eagle habitat in the area, that no tree removal occur within 200 feet of the shoreline, that no white pines be removed within 300 feet of the shoreline, and that no white pines larger than 25 inches dbh be removed at any location within the project site.
    - The project avoids any tree removal within 200 feet of the shoreline.

[3] By letter dated June 7, 2022, the USFWS concurred that the project vegetation removal was consistent with the 4(d) rule for the northern long-eared bat. Subsequently, in late 2022, the USFWS was required to relist the northern long-eared bat as endangered without a 4(d) rule. This rule is slated to go into effect March 31, 2023. This will result in the need to cut trees during the winter months, and the potential need to consult with the USFWS on removal of vegetation from the site under Section 10 of the federal Endangered Species Act. Given the amount of similar forested vegetation within 2.5 miles of the site, and the retention of 91% of the site as forested, the vegetative removal is anticipated to be considered insignificant by the USFWS. The Applicant will ensure compliance with the federal regulations in order to ensure no significant adverse effect to the species, as required by such regulations.

- The project avoids any white pine tree removal within 300 feet of the shoreline.
- The project will need to remove two white pines within 660 feet of the shoreline to construct two stormwater management basins, necessary to improve water quality of runoff to the Delaware River.
- A tree survey for white pines >25" dbh was also conducted for all proposed roads, campsites and grading to facilitate minor widening at existing roads. This analysis found that there are 60 pines >25" dbh within or in the vicinity of disturbance limits. The project results in removal of 30 white pines >25" dbh (shown as red circles); the clear retention of 26 white pines >25" dbh within the study area (shown as green circles), and 14 white pines where there may be grading within 15 feet of the tree trunk, thus impacting a portion of the potential root zone (yellow circles). It is noted that there are significant numbers of white pines that will be retained on the property outside of the proposed disturbance zones.

The proposed project may result in a reduction of habitat due to clearing of vegetation, but minimal degradation of any habitat used by any rare, threatened or endangered species, as listed by New York State or the federal government. Although the project will use some pesticides (i.e., herbicides, insecticides) during construction and operations, pest control will be applied by licensed applicators using minimal levels of application.

The Floodplain Forest, a significant natural community, occupies a 1.5-acre area within the northern edge of the project site along Beaver Brook. LaBella reviewed the mapped floodplain forest during site visits conducted in May 2022. The floodplain forest is still present within the area shown on the NYSDEC mapping. The area is impacted through the anthropogenic uses and adjacent campsites, and it also appears that several trees have been removed over time that were likely dead and considered tree hazards, and the floodplain forest is no longer dominated by basswood and sycamore. The floodplain forest is not considered high quality. No project components are located within the mapped floodplain forest and the project will not affect this community.

The project will involve the modernization of existing campsites with temporary dwelling structures and the clearing and ground disturbance associated with the installation of utilities and road widening. As the campground has existed since the 1940s, the site is sufficiently disturbed. As such, existing Sullivan County species that utilize the site are anticipated to continue to occupy the site amongst the development much in the same way they have in the past.

Based on this information, the proposed project will not result in significant impacts on plants and animals.

6.0 POTENTIAL IMPACT #9 - IMPACT ON AESTHETIC RESOURCES

The land use of the proposed action are obviously different from, or are in sharp contrast to, current land use patterns between the proposed project and a scenic or aesthetic resource.

Part 2 FEAF 9.a. Proposed action may be visible from any officially designated federal, state, or local scenic or aesthetic resource.

Part 2 FEAF 9.c. The proposed action may be visible from publicly accessible vantage points:

i. Seasonally (e.g., screened by summer foliage, but visible during other seasons)

ii. Year round

Part 2 FEAF 9.d. The situation or activity in which viewers are engaged while viewing the proposed action is:

i. Routine travel by residents, including travel to and from work

ii. Recreational or tourism-based activities.

The project site is located within five miles of officially designated and publicly accessible federal, state, or local scenic or aesthetic resources. Identified resources include Hickcok Brook Multiple Use Area, Upper Delaware Scenic Byway, Upper Delaware River, and Minisink Battle Ground Park. The Hickcok Brook Multiple Use Area is approximately 4 miles from the project site. The Upper Delaware Scenic Byway is NY-97, which cuts through the project site. The Delaware River borders the southern boundary of the project site. Minisink Battle Ground Park is located approximately a mile west of the project site. The project site is designated part of the Upper Delaware River recreational river corridor and is not designated part of the scenic river corridor. Based on this information, the project site may be visible (seasonal or year-round) from officially designated federal, state, or local scenic or aesthetic resources. The proposed action is likely to be viewed by people engaged in recreational or tourism-based activities and during routine travel by residents.

The proposed project will involve the removal of 14.6 acres of trees to widen roadways and install utilities. The proposed new camping facilities are not anticipated to cause visual intrusion as they are single-story units that comply with zoning. The aquatic facility includes slides that are 15 feet high or less, with the exception of the tower feature, which is approximately 30 feet high, which is less than the permitted maximum of 35 feet high under zoning. Furthermore, the aquatic center is located at the base of the campground, in a flat area, by SR 97. The Applicant prepared visual simulations that demonstrate suitable landscaping and natural vegetation exists to partially obscure the proposed improvements. Furthermore, a neutral color scheme will ensure minimal effects.

As described, the project will not result in significant adverse impacts to aesthetic resources and is consistent with recreational use of the River.

7.0 POTENTIAL IMPACT #10 - IMPACT ON HISTORIC AND ARCHAEOLOGICAL RESOURCES

The proposed action may occur in or adjacent to a historic or archaeological resource.

Part 2 FEAF 10.b. The proposed action may occur wholly or partially within, or substantially contiguous to, an area designated as sensitive for archaeological sites on the NY State Historic Preservation Office (SHPO) archaeological site inventory.

The project site is located within a known archeologically sensitive area. The project site has experienced a number of activities throughout the nineteenth century by the construction and operation of the D&H Canal, the lumber and logging industry and early twentieth century tourism. Portions of the Canal prism and a former aqueduct over Beaver Brook have been identified within the site, which are listed as eligible on the State Register of Historic Places and may have or will be listed soon on the National Register of Historic Places.

Project information was submitted to the New York State Office of Parks, Recreation, and Historic Preservation (NYSOPRHP) for consultation. NYSOPRHP requested a Phase IA/1B archaeological survey, which was submitted to NYSOPRHP for review in August 2022. In an August 17, 2022 letter, NYSOPRHP stated in a letter, "OPRHP has reviewed the Phase IA/IB Archaeological Survey report for the Camp FIMFO Catskills project (22PR00893) prepared by Hudson Cultural Services, Consulting Archaeologist (August 2022; 22SR00419). OPRHP concurs with the report's recommendation that no additional archaeological investigation is warranted. It is OPRHP's opinion that the project will result in No Effect on historic properties, including archaeological and/or historic resources, listed in or eligible for the New York State and National Registers of Historic Places."

Based on this information, the proposed project will not result in significant adverse impacts to historic and archaeological resources.

8.0 POTENTIAL IMPACT #13 - IMPACT ON TRANSPORTATION

The proposed action may result in a change to existing transportation systems.

Part 2 FEAF 13.e. The proposed action may alter the present pattern of movement of people or goods.

As part of the proposed project, three accesses will be provided to the main campground area off the north side of NYS Route 97. One access will be provided to the river activities area and campground area off the south side of NYS Route 97. The existing access east of Beaver Brook will also remain providing access to the less developed northeastern area of the campground, north of SR 97. In total, two existing accesses will be removed, including one access north of NYS Route 97 and one south. Gravel pedestrian paths will be provided.

The project will not result in a substantial increase in traffic above present levels or generate substantial new demand for transportation facilities or services. No additional campsites are proposed. Project information provided by the Applicant included information about the type of structures, location by camp site, size, and maximum occupancy. As part of the proposed project, the overall number of campsites would be reduced from 342 to 339 campsites with a reduction in occupancy from 2,838 to 2,354 people. Finally, the pool, water play area, and mini-golf are for use by campground guests only. The zipline and paintball would remain open to the public similar to current conditions.

The Applicant's traffic assessment was confirmed by the Town's traffic consultant, Keystone Associates and GTS Consulting in an October 25, 2022 memorandum that stated, "I have reviewed the Environmental Assessment Form Part 1 Report (Revised October 2022) regarding the Camp Fimfo Catskills development, completed by LaBella. Specifically, my review focused on the traffic and parking associated with the development. In general, I am in agreement with the overall conclusion that the proposed modifications will not result in any significant change in anticipated traffic generated by the site.

- The site has been in operation since 1941 as a campground. It is not clear how long the river trips have been operating out of the site, however it is assumed that this operation has been occurring for a number of years as well. The overall use of the site is not changing.
- The number of campsites is being reduced from 342 sites to 335 sites. The overall occupancy capacity is being reduced from 2,838 people to 2,346 people.[4] Reductions in both number of sites and capacity will reduce the overall traffic generation of the campground.
- Added amenities include the aquatic play area and the mini golf area, both of which will only be open to camper staying at the site. These uses will not be independent traffic generators.
- There is no indication that there is any change to the river trip operations."

Parking upgrades will take place as part of the proposed project, including providing 160 spaces on the west side of NYS Route 97 and 126 parking spaces on the east side, including grass and paved (6) accessible spaces, for a total of 286 parking spaces. Beginning in the 2023 season, parking for the river trips will be moved to the east side (from the west side) of NYS Route 97. The Applicant provided parking demand information and adequately demonstrated that suitable parking will be provided for the proposed project. As part of the project review, the Applicant decreased the number of grassed parking spaces shown on the south side SR 97 from 302 to 126 and clarified that the remaining area will be used for overflow parking, as needed.

Accordingly, no significant increase in vehicular trips or impacts related to parking would occur as part of the proposed action.

[4] Note that there has been a minor shift from 335 to 339 sites, but this does not change the conclusion.

9.0 POTENTIAL IMPACT #14 - IMPACT ON ENERGY

The proposed action may cause an increase in the use of any form of energy.

Part 2 FEAF 14.c. The proposed action may utilize more than 2,500 MWhrs per year of electricity.

Part 2 FEAF 14.d. The proposed action may involve heating and/or cooling of more than 100,000 square feet of building area when completed.

The proposed project will create additional demand for energy through electrical upgrades to bring electric to each campsite and the new aquatic center. The campground currently uses electric for existing RV sites and at the various campground buildings, including bathhouses, camp store, welcome center, maintenance buildings, and other related buildings and uses. The new electrical infrastructure will not result in the heating or cooling of greater than 100,000 SF of building area. The project will create additional demand for energy as a result of the new aquatic center and electrical upgrades to campsites and other facilities. The project, however, will not require a significant amount of energy and is estimated well below 2,500 MWh. The total energy demand was calculated conservatively assuming that all buildings are running at full load when they are open. The campsites are calculated based on estimated daily usage typical for the modernized RVs proposed. Total projected annual energy is estimated to be 1,625 MWh.

Based on this information, the proposed action will not result in significant adverse impacts on energy.

10.0 POTENTIAL IMPACT #15 - IMPACT ON NOISE, ODOR, AND LIGHT

The proposed action may result in an increase in noise, odors, or outdoor lighting.

Part 2 FEAF 14.a. The proposed action may produce sound above noise levels established by local regulation.

The campground is open to guests from April through October. On-site river access will continue to be available from April 15th to October 15th, 9am to 6pm, weather permitting. The aquatic center will be operational 9am to 8pm April through August. Other building operations will continue as they do in the current condition. Ambient noise levels may temporarily increase during construction as a result of vehicle and equipment use.

A sound impact assessment was prepared for the project by SLR Engineering, Landscape Architecture, and Land Surveying, P.C. (SLR) and documented in a report dated January 4, 2023. The study was performed to determine whether future sound levels due to camp activity are expected to increase ambient sound levels at nearby residences. The NYSDEC guidance recommends that increases in the ambient sound level should be no more than 10 dBA.

The report describes the findings of an ambient sound measurement survey conducted at the camp in early November 2022. Sound measurements were conducted continuously over the course of several days (including one weekend). The camp was closed for the season by the start of the sound survey. Given the absence of camp activity and the almost total lack of insect noise, the ambient levels recorded are conservatively low, particularly when compared to summertime conditions. In particular, nighttime ambient sound levels during the summer months will likely be much higher than those recorded in November 2022.

Using an industry standard sound propagation modeling software, sound levels from the future camp were calculated at the closest residences. Future levels were then compared with the ambient sound levels measured in November 2022. The calculations indicate that sound from future camp activity

could potentially increase the average ambient sound level by 0 to 1 dBA. This is considered a minor change.

Part 2 FEAF 14.b. The proposed action may result in blasting within 1,500 feet of any residence, hospital, school, licensed day care center, or nursing home.

The road widening and utility installations will require excavation, including rock removal. Based on information received from the Applicant's construction contractors, a combination of trenching machines, excavators (ripping and hydraulic hammering) will be utilized. No blasting is proposed. For road widening and utility trenching, the trenching machine would likely be used. For stormwater practices, the aquatic area, building foundations/footings and retaining walls ripping by excavators and hydraulic hammering will likely be needed.

The contractor will utilize the following best practices to reduce nuisance related to rock removal.

- Trucks and other vehicles used to transport particulate matter will be covered, and any particulate matter kept on site shall be sufficiently wetted or stored to prevent particulate matter from becoming airborne.
- Portable hand water sprinklers or hose sprinklers will be used for dust control. Water sprays or jets will be designed to break the water stream into small droplets or otherwise to provide effective wetting.
- Suitable drainage means will be provided for the removal of water and sludge that drains from the operation.
- Soil or debris piles will be moistened if dust is being emitted from the piles. Adequately secured tarps, plastic or other material may be used to further reduce dust emissions.

Part 2 FEAF 14.c. The proposed action may result in routine odors for more than one hour per day.

The campground currently produces minor, temporary odors associated with typical campground functions, such as outdoor cooking. The proposed action, with no increase in the number of campsites, will have no impact on this existing condition.

Part 2 FEAF 14.d. The proposed action may result in light shining onto adjoining properties.

Part 2 FEAF 14.e. The proposed action may result in lighting creating sky-glow brighter than existing area conditions.

The proposed project will include additional lighting, as needed, for safety reasons. Lighting is intended to be minimal with the objective of limiting artificial outdoor lighting to maintain the camping experience, where lighting is proposed (e.g., safety along sidewalks, parking areas) these lights will be dark-sky compliant and comply with the Town's lighting regulations. Campsites occupied by RVs are single-story structures that are nestled amongst tree, and are not anticipated to be substantially visible especially given the season leaf-on conditions during which they will be used. The Applicant prepared a photometric analysis using the lighting specifications and demonstrated that there will be no light spill at property lines.

Based on this information, the proposed project will not result in significant adverse impacts on noise, odor and light.

11.0 POTENTIAL IMPACT #16 - IMPACT ON HUMAN HEALTH

The proposed action may have an impact on human health from exposure to new or existing sources of contaminants.

Part 2 FEAF 16.f. The proposed action has adequate control measures in place to ensure that future generation, treatment and/or disposal of hazardous wastes will be protective of the environment and human health.

There have been no reported spills at the project site, and no remedial actions have been conducted at or adjacent to the project site.

The proposed project will involve limited generation of hazardous waste as part of the demolition and removal of buildings on site, including the existing welcome center. Hazardous materials were identified in the building's exterior paint (lead paint), chemical fire extinguishers, fluorescent lamps (mercury), polychlorinated biphenyl (PCB) containing vessels, and appliances. Remediation and disposal of all hazardous materials will be conducted by a licensed contractor, prior to demolition of the existing building.

Additionally, the proposed project will store the following products: Chlorine (1,000 gallon AST), gasoline (500 gallon AST), and diesel (500 gallon AST). Volumes per unit time will vary. Gasoline is filled 1/week during open season and every two weeks during off season; Diesel is filled 1/week during open season and not used during off season; Chlorine is filled monthly during open season and not during off season. All bulk storage includes secondary containment.

The aquatic center will use Calhypo for sanitizer which is a solid chlorine brick. These are kept in sealed buckets which double as storage devices. For pH buffer, 15 gallon containers supplied as needed by the chemical supplied.

Part 2 FEAF 16. i. The proposed action may result in an increase in the rate of disposal, or processing, of solid waste.

The project will involve or require the management or disposal of solid waste (excluding hazardous materials). Solid waste disposal methods during construction will be determined by the contractor and will follow all applicable NYSDEC guidelines and standards governing waste disposal.

The campground facility will follow all applicable NYSDEC guidelines and standards governing waste disposal. The campground facility will have trash receptacles and will use Waste Management solid waste disposal services. Waste Management will pick up trash once per week from one 4-yard dumpster, two 6-yard dumpsters, and twelve 8-yard dumpsters.

Part 2 FEAF 16.j. The proposed action may result in excavation or other disturbance within 2,000 feet of a site used for the disposal of solid or hazardous waste.

Part 2 FEAF 16.l The proposed action may result in the release of contaminated leachate from the project site.

The project site has never been used as a municipal, commercial or industrial solid waste facility. The site does not adjoin property which is or was at one time used to commercially treat, store, and/or dispose of hazardous waste. The site does not adjoin, but is located within 2,000 feet of a site, former Barnes Landfill, that was previously used for the disposal of solid waste. The Barnes Landfill site was a former private municipal landfill which operated from 1947 to 1989 and was regulated under the

solid waste rules at 6 NYCRR Part 360. The landfill is not listed as an inactive hazardous waste disposal site or State Superfund site.

The New York State Department of Environmental Conservation lists this landfill in the New York State Inactive Landfill Initiative July 2022 Status Report. The Barnes site is included in Priority Group 2: Exceedance in Landfill Groundwater Samples, No Exceedances to Downgradient Drinking Water Supplies. Sites included in this group, are the sites for which exceedances of criteria in groundwater have been identified; however, potential receptor sampling through December 2020 has shown no impacts. These sites have been allocated to the second Priority Group of the Solid Waste Site Mitigation and Remediation Priority List. Specific recommendations for these sites include, but are not limited to, the following actions: Repeat monitoring of potentially impacted receptors, in accordance with NYSDOH recommendations; Continued monitoring of landfill groundwater; Mitigation/remediation considerations based on future results.

As described above, the NYSDEC has not detected exceedances at receptor locations. The project does not require the installation of new water supply wells and existing water supply wells will continue to be regulated by the NYSDOH with regular testing required. In addition, the existing wells will be required to undergo additional treatment as part of the proposed improvement and modernization program. The proposed project will result in ground disturbance within 2,000 FT of the former landfill, with some ground disturbance occurring in areas already disturbed (e.g., widening of roadway area). Ground disturbance will involve road widening, utility trenching and installation, installation of stormwater practices, construction of the aquatic center, construction of buildings, including foundations and footings, and construction of retaining walls.

Based on this information, the proposed action will not have significant adverse impact on human health.

12.0 POTENTIAL IMPACT #17 - CONSISTENCY WITH COMMUNITY PLANS

The campground is an existing economic asset within the Town of Highland that is aligned with the community's focus on sustaining recreational uses along the Delaware River. The campground has operated since the 1940s and has not undergone significant improvement in the recent past. The proposed project will revitalize this important economic asset aligning it with current trends in the camping and Recreational Vehicle (RV) market. The campground will continue to be used for access to the Delaware River for canoeing, kayaking, and fishing.

The Town's 2012 Comprehensive Plan includes as a specific purpose, "#7 To preserve and enhance the Town's rural character, cultural assets and historical heritage, including its longstanding commitment to hunting, hiking, fishing and outdoor recreation as a source of enjoyment and a foundation of the local economy." With regard to campgrounds located along State Route 97, the Plan states,

"Canoeing on the Delaware, as well as rafting and kayaking, has proven to be the primary tourist attraction in the town in the later part of the 20th and early part of the 21st Centuries. Canoe liveries and campgrounds line the river corridor along State Route 97, a 70-mile long stretch of which, including the segment in Highland, was legislatively designated the Upper Delaware Scenic Byway in 2002, and they do a thriving business in the warm weather months, contributing greatly to the town's economy."

The Town's Plan includes several goals to maintain and improve the quality of life for the current and future residents of the Town. Goal #7 states,

"To preserve and enhance the Town's rural character, cultural assets and historical heritage, including its longstanding commitment to hunting, hiking, fishing and outdoor recreation as a source of enjoyment and as a foundation of the local economy."

To implement this goal, several strategies are stated, including,

"e. Develop and promote eco- tourism opportunities in the Town that build upon assets such as the Delaware River and the work of the Eagle Institute."

The goal to increase recreational assets along the Delaware River should not be undertaken in conflict with the preservation of natural resources. The proposed project includes the modernization and improvement of an existing economic asset that has served the community for over 80 years. The proposed action includes clearing and ground disturbance related to the widening of the road, which will improve operations and emergency service access. Disturbance will also result from the installation of temporary dwelling structures located within the mountainside area, but grading and clearing will be limited to a small footprint suitable to accommodate the camping area required and to account for ancillary uses, e.g., parking area, firepit, etc. The aquatic center is proposed within an area that was previously cleared. The Applicant has consulted the NYSDEC regarding potential impacts to the Bald Eagle and will comply with requirements, as needed. Finally, the campground remains as a seasonal use, preserving the overall site for winter habitation by common Sullivan County species and the SWPPP will ensure no significant adverse impacts to aquatic resources.

Therefore, the proposed project to modernize and improve an existing recreational, eco-tourism, economic asset within the Town is consistent with the Town's and County's open space planning goals and will have a positive impact on open space and recreation. Accordingly, the proposed project will not result in an impairment of natural functions, or "ecosystem services," provided by an undeveloped area, including but not limited to stormwater storage, nutrient cycling, wildlife habitat.

The Sullivan County 2008 Conserving Open Space and Managing Growth identifies the project site as high priority for recreational and cultural resources. The proposed project, to modernize and improve an existing seasonally-operated campground, is consistent with Strategy #4 in this report, which states, "Expand and improve efforts to promote Sullivan County's recreational, historic and cultural resources to both visitors and residents."

Based on this information, the proposed project is consistent with local community plans.

13.0 POTENTIAL IMPACT #18 - CONSISTENCY WITH COMMUNITY CHARACTER

As stated above in Section 12.0, The Town of Highland specifically lists preserving and enhancing "the Town's rural character, cultural assets and historical heritage, including its longstanding commitment to hunting, hiking, fishing and outdoor recreation as a source of enjoyment and as a foundation of the local economy" as a goal in its 2012 Comprehensive Plan. Exploring "opportunities to create campgrounds and other outdoor amenities for residents and visitors (such as Hickok Brook MUA)" is listed as a strategy to implement this goal.

The existing campground has been in operation since around 1941 and was acquired by Northgate Resorts in 2020. As part of the proposed project, the overall number of campsites would remain unchanged. The introduction of the aquatic area will revitalize this underutilized economic asset aligning it with market trends. The project complies with zoning, including height regulations and reduces the number of campsites and overall occupancy.

Improvements are proposed to existing wastewater facilities and construction of new septic disposal systems (SSDS) is proposed. Improvements are also proposed to well and water supply infrastructure

and stormwater management facilities. Upgrades will be undertaken to electrical infrastructure, landscaping and fencing, solid waste collection infrastructure, and roads will be widened.

The proposed project is consistent with the community character, and will benefit the project site with its proposed improvements and additions.

April 24, 2023

Norm and Michael.

The following are my comments regarding the Planning Board's issues below:

Email to Ken
CC:Norm

Regarding the Planning Board's review of Part 2, the following issues arose:

1) Impact on Land

1(d) - removal of material. Small impact.

The Board discussed how small an impact?

The natural material that this question is referring to for this project would be soil and rock from grading and/or trench excavation for utilities, trees and stumps. To make the answer "No Impact", place a condition that the applicant is not to remove over 1,000 tons of material or no material is to be removed or only certain material can be removed. An example may be that no soil or rock shall be removed from the site, stumps must be ground up and used for mulch and only trees may be removed that can be used for lumber. Trees that cannot be used for lumber are to be cut for firewood.

If the board does not want to place a condition on the applicant, to maintain the response to "No or Small", the board can ask the applicant where the material will be disposed of to make sure it doesn't create an impact elsewhere.

My opinion would be to limit what can be removed and not allow over 1,000 tons of natural material to leave the site.

4) Impact on groundwater

4(a)- additional demand on existing wells. Small impact.

The Board was very concerned with the impact on existing wells questioning the hydrogeological report having been done not in the Summer but in November. Applicant claims by letting wells flow at full capacity, they accounted for that. Applicant referred to Part 3 comments on this.

The Board has the option of retaining another hydrogeologist to review the report and offer an opinion regarding its conclusion.

The Board can request the pump test be completed again with the neighboring wells monitored with the permission of the Owners.
The Board can ask the Applicant to have the neighboring wells tested for well yield and quality to establish a base line should the adjacent Owners claim they have well issues when the Camp is in operation during the first year.

I'(

elevation difference of the camp wells (camp wells are lower) and the direction of groundwater flow to the river. Apparently, the adjacent wells did not experience an issue during the pump test or the Town would have been notified. However, the issue requires closure. I would be interested in knowing what would satisfy the adjacent Owners?

9) Impact on Aesthetic Resources

9(c) - Visible from publicly accessible vantage points.

Some Board members are concerned with the view of pool and water park from Route 97 that is inconsistent with other views on Route 97. Want to change 9(c) to moderate impact.

9(d) - Viewing - same as 9(c), want to change to moderate impact.

A revised response to Moderate Impact is reasonable. Is there a condition(s) that the Board could impose that would lessen the impact such as landscaping or colors? The photo simulations from Route 97 indicate the pool and water park is not very visible?

13) Impact on Transportation

13(a) - Projected traffic increase.

Board is very concerned traffic studies were insufficient in not having been done in the Summer but in Fall. Want to change no impact to moderate impact.

The change to Moderate Impact is reasonable.

Although the traffic study indicates no significant increase in vehicle trips which the Town's Traffic Consultant agrees with, the issue is an existing on-going problem. It appears many factors contribute to the problem not just the camp and unfortunately NYSDOT has not recognized the traffic concerns in Barryville on a Saturday in the summer. Unfortunately, the Board is limited as to conditions to impose on the Applicate as it is NYS road.

The Board could request the Applicant update the traffic study with actual traffic counts in the summer with the camp in full operation. The Town's traffic consultant should be consulted regarding the scope and of the study.

15) Impact on Noise, Odor and Light

15(a) Noise levels.

Board concerned with noise report not being done during Summer and possible increased noise impact.
The Sound Impact Assessment prepared predicts the decibel increase with the camp in full operation over ambient decibel readings taken in November 2022 to be 0-1 dBA. Typically, ambient readings taken during the summer are higher, resulting in the increase in decibel reading to be less with the camp in full operation

The decibel reading with the camp in full operation is simulated by the computer program. The Board could place a condition on the Applicant to take actual readings in the summer of both ambient and full operation of the camp to confirm the computer simulation.

17) and 18) While applicant said no impact, the Board wanted each item read with discussion of possibly changing to Community especially 18(b) with discussion on strain on volunteer services (ambulance/fire safety).

Question 17 states "The proposed action is not consistent with adopted land use plans." And answered "No". To change the response to "Yes" will require some reference as to why it is not consistent with adopted land use plans. The applicant states references that indicate it is. We can't or shouldn't discuss questions a. through h. without supporting references to the contrary.

Question 18 is more subjective but still requires a reason to change the initial response to "Yes". As indicated in the Part 2, the Board should review and discuss the Part 1 answers to C.2, C.3, D.2, and E.3 for possible revisions to the responses.

These are some of the items to be discussed during today's conference call as well as Part 3, and preparation of Resolution.

Thank you,

Michael