

TOWN OF HIGHLAND
RESOLUTION TO ACCEPT FINAL SCOPE
FOR
CAMP FIMFO
MODERNIZATION AND IMPROVEMENT PROJECT
SEQRA ENVIRONMENTAL REVIEW

WHEREAS, Sun NG Kittatinny RV LLC proposes improvements to an existing, seasonally-operated campground, formerly known as the Kittatinny Campgrounds and Canoes – Barryville Base, located at 3854 NYS Route 97 on an approximately 235-acre site in the hamlet of Barryville in the Town of Highland, and

WHEREAS, The campground has been in operation since around 1941 and was acquired by Northgate Resorts in 2020, and

WHEREAS, The campground is open to the public seasonally, between April – October, and

WHEREAS, 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, and

WHEREAS, The campground is improved with a welcome center area (that contains check in, office, retail), camp store, maintenance buildings, pole barns, three bathhouses, several storage buildings, an administrative office, and two existing residences on site, and

WHEREAS, The campground has existing Delaware River access and operates a livery, and

WHEREAS, The proposed project will reduce the total number of campsites from 342 to 339, and

WHEREAS, With the proposed improvements, 283 campsites will be converted to new types of temporary camping structures, which are Recreation Vehicle Industry Association (RVIA) certified units, and

WHEREAS, Three (3) accesses will be provided to the main campground area off the north side of NYS Route 97; one (1) access will be provided to the river activities area and campground area of the south side of NYS Route 97; and two existing accesses will be removed, including one access north of NYS Route 97 and one south, and

WHEREAS, The existing welcome center will be demolished and replaced with a new building at the same location; the two maintenance buildings will be demolished and replaced with a single new building in a new location; the camp store will be converted to a food and beverage facility; and a new aquatic play area and mini golf course area will be constructed in the welcome center area, and

WHEREAS, Improvements are proposed to existing wastewater collection and treatment facilities and for the construction of a new septic disposal systems (SSDS), and

WHEREAS, Improvements are proposed to well and water supply infrastructure, and

WHEREAS, Stormwater management facilities are proposed where currently no stormwater management facilities exist, and

WHEREAS, Updates to electrical Infrastructure, landscaping and fencing, solid waste collection Infrastructure, and roads are proposed, and

WHEREAS, The project requires the following approvals/reviews/consultations:

1. Town Planning Board Site Plan, Special Use Permit, and Floodplain Permit
2. Upper Delaware Council and National Park Service Substantial Conformance Review
3. NYS Department of Environmental Conservation SPDES Individual permit for wastewater and SPDES General Permit for stormwater
4. NYS Department of Health for wastewater, water treatment design, campgrounds, swimming pools
5. NYS Department of Transportation for SR 97 modifications
6. NYS Office of Parks, Recreation and Historic Preservation for archeological and historic resource consultation
7. Sullivan County Department of Planning and Development GML 239
8. Sullivan County Industrial Development Agency PILOT
9. Delaware River Basin Commission for floodplain management and sanitary design

WHEREAS, the Town of Highland determined the proposed action is a Type I Action, pursuant to the New York State Environmental Quality Review Act (SEQRA) 6 NYCRR Part 617; therefore, a coordinated review of the action was required, and

WHEREAS, the Town of Highland declared intent to serve as Lead Agency for review of the proposed action, pursuant to the requirements of the State Environmental Quality Review Act, 6NYCRR 617.6 and circulated the Full Environmental Assessment Form Part 1 and associated technical analyses and reports to the involved and interested agencies in April 2022, and

WHEREAS, the Town declared themselves Lead Agency for review of the proposed action in May 2022, and

WHEREAS, the Town of Highland reviewed Part 1 and Part 2 of the EAF and all supporting information, and

WHEREAS, the Town of Highland has considered all reasonably related long-term, short-term, and cumulative environmental effects associated with the proposed action including other simultaneous or subsequent actions, and

WHEREAS, that in accordance with Article 8 of the Environmental Conservation Law a positive declaration of environmental significance was issued in connection with the Proposed Action project pursuant to Section 617.6 of the SEQRA Regulations on September 27, 2023, and

WHEREAS, a draft scoping document to guide subsequent preparation of a Draft Environmental Impact Statement relative to the Proposed Action was prepared for the Camp Fimfo – Modernization and Improvement Project under consultation with the Town's Planning Board, Attorney, and the Town's Engineering Consultant, Keystone Associates, and

WHEREAS, the Planning Board held a twenty (20)-day public comment period for the draft scoping document for the Camp Fimfo – Modernization and Improvement Project between November 3, 2023 and November 22, 2023 and sought comments from involved and interested agencies, and the public on the draft scoping document for the DEIS for the Proposed Action in accordance with the requirements of SEQRA, and

WHEREAS, the Town's Engineering Consultant, Keystone Associates, provided a response memo to the scoping comments received to detail proposed revisions to the Draft Scope, and

NOW, THEREFORE BE IT RESOLVED, the Planning Board, as the SEQRA lead agency and the agency responsible for administering the project under SEQRA, adopts the Final Scope to guide subsequent preparation of a Draft Environmental Impact Statement relative to the Proposed Action that has been prepared for the Camp Fimfo – Modernization and Improvement Project under consultation with the Town's Planning Board, Attorney, and the Town's Engineering Consultant, Keystone Associates, and

BE IT FURTHER RESOLVED that this Planning Board hereby authorizes circulation of the Final Scoping Document for the Camp Fimfo – Modernization and Improvement Project to all involved and interested agencies pursuant to SEQRA and to file and publish said Notice in accordance with Part 617 of the implementing regulations pertaining to Article 8 of the Environmental Conservation Law.

	Yea	Nay
Norman Sutherland, Chairman	✓	-----
Steve Bott	✓	-----
Tim McKenna	-----	-----
Jeffrey Spitz	✓	-----
JT Vogt	✓	-----
Laura Burrell (alternate)	✓	-----

Town of Highland Planning Board
 4 Proctor Rd
 Eldred, NY 12732
 Telephone: (845) 557-6085
 Email: planningboardzba@townofhighlandny.com
 Contact: Monica McGil, Planning Board Secretary
 Date:

Camp Fimfo Modernization and Improvement Project

Town of Highland, New York Draft Environmental Impact Statement (DEIS) FINAL Scoping Document

Name of Project: Camp Fimfo – Modernization and Improvement Project

Applicant: Sun NG Kittatinny RV LLC

Project Location: 3854 NYS Route 97
Town of Highland,
Sullivan County, NY

Tax ID: 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, 25.-1-4.2, 25.-1-8

SEQRA Classification: Type I

Lead Agency: Town of Highland
Planning Board
4 Proctor Road
Eldred, NY

Lead Agency Contact: Monica McGil, Secretary
Planning Board
Town of Highland
(845) 557-6085

Date of Scope Adoption: **December 20, 2023**

Camp Fimfo
Modernization and Improvement Project
Town of Highland, New York
Draft Environmental Impact Statement (DEIS)
Final Scope

This document identifies the issues to be addressed in the Draft Environmental Impact Statement (DEIS) for the proposed Camp Fimfo (the "Project") in the Town of Highland, New York (the "Town"), proposed by Sun NG Kittatinny RV LLC (the "Applicant"). This Scope document contains the items described in 6 NYCRR Part 617.8 (e) (1) through (7). For purposes of this Scope, the term "Project" means the Project and all related implementing actions, such as approvals and permits.

PROPOSED PROJECT

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-operated Recreational Vehicle (RV) campground (known as the Kittatinny Campgrounds and Canoes – Barryville Base). The campground is located at 3854 NYS Route 97¹ 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 RV campground is open April – October, and currently includes 342 camp sites (tent and RV) split into ten distinct areas (e.g., campsites 100s – 1000s) with the majority of campsites (100s – 600s, 1000s) clustered to the west and north of the site, leaving the eastern portion of the property for hiking trails, zipline, and paintball. 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 bathhouses² serving the campsites, several storage buildings, and a building used for the office. There are also two existing residences on site. The campground currently operates a canoe livery on the Upper Delaware River. The 900s campground sites (RVs and tents) 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.

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.

As part of the Proposed Project, 283 tent campsites will be converted to RV campsites, featuring Recreation Vehicle Industry Association (RVIA) certified temporary camping structures. No new campsites will be added, and the overall number of campsites will be reduced from 342 to 339 campsites, with a reduction in occupancy from 2,838 to 2,354 people. With the proposed improvements, 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 with snack and limited food preparation only. 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 for campers only.

As part of the Proposed Project, three accesses will be provided to the main campground area north of NYS Route 97. One access will be provided to the river activities area and campground area south 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 NYS Route 97. In total, two existing accesses will be removed, including one access north of NYS Route 97 and one south. The Proposed Project includes improvements to the internal traffic circulation, including an improved check-in/out vehicular pattern. A total of 286 parking spaces are proposed, including 120 spaces provided as grass parking, south of NYS Route 97. New gravel pedestrian paths will also be provided.

Improvements are proposed to existing wastewater collection and treatment facilities to modernize them in accordance with current sanitary requirements. In addition, construction of additional septic disposal systems (SSDS) is proposed to accommodate converted tent-to-RV sites and other site improvements (e.g., welcome center building, food and beverage building, maintenance and laundry building, and aquatic area).

Treatment and distribution improvements are proposed to well and water supply infrastructure. No new wells are proposed. The Proposed Project will include construction of new stormwater management facilities; currently, no stormwater management practices exist on the Site. Upgrades will be undertaken to electrical infrastructure, landscaping and fencing and new signage is proposed.

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.

At this time, the proposed Project requires the approvals and permits identified as follows:

1. Town Planning Board Site Plan, Special Use Permit, and Floodplain Permit
2. Upper Delaware Council and National Park Service Substantial Conformance Review - Completed
3. NYS Department of Environmental Conservation SPDES Individual permit for wastewater and SPDES General Permit for stormwater
4. NYS Department of Health for wastewater, water treatment design, campgrounds, swimming pools
5. NYS Department of Transportation for SR 97 modifications
6. NYS Office of Parks, Recreation and Historic Preservation for archeological and historic resource consultation
7. Sullivan County Department of Planning and Development GML 239
8. Sullivan County Industrial Development Agency Payment in lieu of Taxes (PILOT)
9. Delaware River Basin Commission for floodplain management and sanitary design

ORGANIZATION AND CONTENT OF THE DEIS

The DEIS will contain the following information and address the following issues as they relate to the proposed Project.

I. COVER SHEET, TABLE OF CONTENTS, EXECUTIVE SUMMARY

A. Cover Sheet

1. The name of the Project and its location.
2. The name, address, email and telephone number of the Lead Agency and contact person.
3. The name, address, email and telephone number of the primary DEIS preparer and other consultants that contributed to the DEIS; the date of DEIS submission and acceptance.
4. The name, address, email and telephone number of the Applicant/Owner.
5. The date the DEIS is deemed complete.
6. DEIS Public hearing date and public comment period; and

7. Website where the DEIS and Final Environmental Impact Statement (FEIS) will be posted.

B. Table of Contents

C. Executive Summary

1. Introduction
2. Description of the proposed Project.
3. List of all involved and interested agencies.
4. Statement of Project purpose and need.
5. Summary of significant adverse environmental impacts identified in each subject area.
6. Summary of mitigation measure proposed for significant adverse environmental impacts; and
7. Description of alternatives analyzed and a comparison with the Proposed Project.

II. DESCRIPTION OF THE PROPOSED PROJECT

A. Description of Project Site

1. Description of the site location, including acreage; zoning and tax map designations; frontage and access.
2. Description of existing topography and natural resources, including aquatic resources.
3. Description of site location within Upper Delaware River Recreational Segment as described in the Upper Delaware River Management Plan, Land and Water Use Guidelines.
4. Describe the nature and location of any known covenants and easements on the Project Site.
5. Description of on- and off-site utilities serving the Project Site.
6. Description of all existing uses and structures, currently on the Project Site, including buildings or other facilities to be removed or retained, and their current physical condition.
7. Discussion of Project Site history, including prior improvements.

B. Description of the Proposed Project

1. Total number of campsites
2. Occupancy

3. Seasonal operation
 - a. Campground
 - b. Canoe Livery
4. Campsite overnight accommodation upgrades
 - a. Tent campsites
 - b. Recreational Vehicle (RV) campsites
 - (1) RVIA certified units
 - (2) Differentiate between RV pads (for guests to bring their own RVs) and Park Model RVs and other site types where the RVs remain on the property year-round for the proposed project.
 - (3) Describe number of tent, pull-in RV, park model RV, etc. sites.
5. Safety
 - a. Policies on safety (including River), drugs, alcohol, and firearms.
6. Welcome center
 - a. Demolition of one existing building
 - b. New construction of one building
7. Maintenance building
 - a. Demolition of two buildings
 - b. New construction of one building
8. Camp store conversion
9. Canoe livery operations
10. Aquatic center
 - a. Building components
 - b. Mechanical components
 - c. Describe pool filling and draining procedures, source of water, and draining outlets.
11. Mini golf
12. Other new recreational components
 - a. Bouncing pillow
 - b. Upgrades to playground

- c. New sport courts
- 13. Parking improvements
- 14. Lighting improvements
- 15. Landscaping improvements
 - a. Discuss use of native species
- 16. Pedestrian improvements
- 17. Impervious reduction/demolition of other ancillary structures
- 18. Sanitary wastewater improvements
- 19. Water system improvements
- 20. Stormwater system improvements
- 21. Electrical system improvements
- 22. Solid waste collection improvements
- 23. On-site roadway improvements
 - a. Emergency access
- 24. Off-site access and roadway improvements
 - a. Pedestrian ahead signage
- 25. Anticipated tree removal
- 26. Anticipated excavation
- 27. Construction
 - a. Description of construction sequencing.
 - b. Discussion of emergency access and provisions for emergency service during construction.
 - c. Identify temporary parking area for construction workers, and hours of construction activity.
 - d. Identify rock removal methods, including blasting, as applicable.
- 28. Project Purpose and Need
 - a. Discussion of Project purpose and need, including data and/or demographic market trends and identified demand for a project of this type and target audience.
 - b. Discussion of objectives of the Applicant.
 - c. Description of benefits of the proposed Project.

III. EXISTING CONDITIONS, POTENTIAL IMPACTS AS A RESULT OF THE PROPOSED PROJECT AND PROPOSED MITIGATION

A. Land Use, Zoning and Public Policy

1. Land Use

a. Existing Conditions

- (4) Description and mapping of current Project Site land use, including current building conditions.
- (5) Specify occupancy at each campsite currently and to the extent it is available, historic occupancy information should be provided as well.
- (6) Describe current number of tent, pull-in RV, park model RV, etc. sites.
- (7) Describe historic presence of campsites on site, including the type of campsite (e.g. tent vs RV pad vs park model RVs,) and what year(s) they were added to the project site to the extent known.
- (8) Description of any easements or covenants.
- (9) Description and mapping of land uses adjoining the Project Site.
- (10) Description of land use compatibility with other uses within radius.

b. Future without the Proposed Project

- (1) Description of any known land use changes for the Project Site, which would occur in the future without the proposed Project.
- (2) Future known and planned projects in the Town of Highland as identified by the Town with the potential to affect the proposed Project.

c. Potential Impacts as a result of the Proposed Project

- (1) Describe the compatibility of the proposed Project with existing land uses in the study area.
- (2) Specify occupancy at each campsite following the proposed project.
- (11) Describe proposed number of tent, pull-in RV, park model RV, etc. sites.

d. Mitigation

- (1) Discuss appropriate mitigation measures to reduce identified impacts.
2. Zoning Regulations
 - a. Existing Conditions
 - (1) Map and describe zoning districts on the Project Site, including: use, density, bulk and height, and lot and dimensional requirements per Chapter 190 (Zoning) in the Town Code.
 - a. Applicability of Recreational Vehicle definition.
 - b. Applicability of Temporary dwellings definition.
 - c. Describe existing, legal, non-conforming structures.
 - (2) Describe zoning of adjoining parcels.
 - (3) Description of Chapter 190-25, Campgrounds and applicability to the existing use.
 - a. Describe existing, legal, non-conforming setbacks.
 - (4) Description of Section 190-57 Sign regulations and its applicability to the site.
 - (5) Description of Section 190-73 D Standards applicable to special permitted uses.
 - (6) Description of Section 190-73 F Considerations for site plan approval or denial.
 - b. Future without the Proposed Project
 - (1) Discuss the use of the Project Site without the proposed Project.
 - c. Potential Impacts as a result of the Proposed Project
 - (1) Discuss compliance applicable zoning regulations for use, density, bulk, and height.
 - a. Discuss compliance with Recreational Vehicle definition.
 - i. Differentiate between RV pads (for guests to bring their own RVs) and Park Model RVs and other site types where the RVs remain on the property year-round for the proposed project.
 - b. Discuss compliance with Temporary dwellings definition.

- c. Discuss any change to existing, legal, non-conforming structures.
 - (2) Discuss compliance with Chapter 190-25, Campgrounds.
 - a. Describe any change to existing, legal, non-conforming setbacks.
 - (3) Discuss compliance with Section 190-57 Sign regulations.
 - (4) Discuss compliance with Section 190-73 D Standards applicable to special permitted uses.
 - (5) Discuss compliance with Section 190-73 F Considerations for site plan approval or denial.
 - d. Proposed Mitigation
 - (1) Discuss appropriate mitigation measures to reduce identified impacts.
- 3. Public Policy
 - a. Existing Conditions:
 - (1) Describe local, regional and other applicable public planning and policy documents including, Town of Highland 2012 Comprehensive Plan, Upper Delaware River Management Plan, Land and Water Use Guidelines, Upper Delaware Scenic Byway, and the Sullivan County 2008 Conserving Open Space and Managing Growth including recommendations relevant to the Project Site.
 - b. Future without the Proposed Project
 - (1) Describe any currently pending public policy initiatives that would affect the site or the one-mile study area.
 - c. Potential Impacts as a result of the Proposed Project
 - (1) Describe sustainability practices in operation or construction of facility.
 - (2) Discuss the effects of the proposed project on disadvantaged communities, including whether the action may cause or increase a disproportionate pollution burden on a disadvantaged community.
 - (3) Discuss compatibility of the proposed Project with planning and public policy documents listed above.
 - (4) Discuss Substantial Conformity findings of Upper Delaware Council (UDC) with regard to the Upper Delaware River Management Plan, Land and Water Use Guidelines.

(5) Discuss Substantial Conformity findings of the National Park Service with regard to the Upper Delaware River Management Plan, Land and Water Use Guidelines.

d. Proposed Mitigation

(1) Discuss appropriate mitigation measures to reduce identified impacts.

B. Community Character/Visual Impacts

1. Existing Conditions

- a. Describe the visual character of the Project Site and the area located within a one-mile radius of the Project Site.
- b. Describe and provide photographs of the appearance of the Project Site.
- c. Describe the surrounding community character including the surrounding residential areas, commercial uses, hunting clubs, canoe liveries, campgrounds, and the Upper Delaware River.
- d. Perform a GIS based visibility analysis assuming the Project is built to identify areas within one, three, and five miles from which the Project Site is visible.
- e. Perform a field visit to publicly accessible areas as determined through consultation with Town to verify Project visibility while simulating Project visibility through a balloon test or similar means.
- f. Take photographs of the Project Site in "leaf-off" conditions from publicly accessible areas as determined through consultation with Town and provide a narrative description of method and findings.

2. Future without the Proposed Project

- a. Provide narrative description of the Project Site in the future condition without the proposed Project.

3. Potential Impacts as a result of the Proposed Project

- a. Provide photographic simulations of the Project during "leaf-off" conditions from areas determined through consultation with Town and describe Proposed Project in context to surroundings.
- b. Discuss the proposed exterior lighting program.
- c. Describe the architectural design of proposed structures.
- d. Describe landscaping and use of native species.
- e. Describe potential impacts from Proposed Project on publicly accessible areas identified by Town.

4. Proposed Mitigation

- a. Discuss appropriate mitigation measures for identified impacts.

C. Geology – Soils, Topography and Steep Slopes

1. Existing Conditions

- a. Describe subsurface conditions based on available soil testing and available geotechnical information.
- b. Describe surface conditions including identification of outcroppings, significant depressions, ridges or other landforms through Site.
- c. Provide an existing conditions slope map based on a topographic survey.

2. Future without the Proposed Project

- a. Describe conditions on the Project Site without the proposed Project.

3. Potential Impacts as a result of the Proposed Project

- a. Provide and describe the grading plan.
- b. Describe potential impacts from site grading with respect to bedrock depth, soil erosion, slope stabilization, rock removal, and tree removal.
- c. Provide an estimate of cut and fill.
- d. Discuss rock removal and blasting and/or rock chipping, if any, and on-site rock crushing, if any. Describe plan/protocols, including compliance with relevant standards and laws.
- e. Describe environmental and sedimentation control measures.
- f. Provide a soil erosion control plan.

4. Proposed Mitigation

- a. Discuss appropriate mitigation measures to reduce identified impacts.

D. Groundwater Resources and Water Supply

1. Existing Conditions

- a. Describe subsurface groundwater conditions, including Delaware River Streamflow Zone/New Jersey Coastal Plains Aquifer Sole Source Aquifer.
- b. Provide depth to water table, yield and water quality data from wells on the subject property.
- c. Describe existing demand for potable water.

- d. Describe existing wells.
 - e. Describe existing water treatment.
 - f. Describe existing water distribution system.
 - g. Describe existing permits.
 - 2. Future Without the Proposed Project
 - a. Describe conditions on the Project Site without the proposed Project.
 - 3. Potential Impacts as a result of the Proposed Project
 - a. Discuss potential for encountering or interacting with groundwater resources during construction.
 - b. Describe Project-generated demand for potable water.
 - c. Discuss potential for well interference with neighboring wells.
 - d. Describe proposed water treatment system for existing wells.
 - e. Describe water distribution improvements.
 - f. Describe required permits.
 - 4. Proposed Mitigation
 - a. Discuss appropriate mitigation measures to reduce identified impacts.
- E. Aquatic Resources and Floodplains
- 1. Existing Conditions
 - a. Delineate and map existing streams, waterbodies, wetlands and aquatic resource buffers under Federal (United States Army Corps of Engineers), State, and Town jurisdictions.
 - b. Describe and map floodplains on the Project Site.
 - c. Describe existing facility Flood Evacuation Plan.
 - 2. Future without the Proposed Project
 - a. Describe conditions on the Project Site without the proposed Project.
 - 3. Potential Impacts as a result of the Proposed Project
 - a. Describe potential impacts to Federal, State and Town regulated aquatic resources and measures to avoid and/or minimize potential impacts.
 - b. Discuss compliance with aquatic resource protection regulations.
 - c. Describe any impacts to floodplains.

- (1) Describe new development within the floodplain.
 - (2) Describe floodproofing and flood protection design and accommodations.
 - (3) Describe potential for Proposed Project to change floodplain elevation.
 - (4) Discuss the status of any required permitting.
- d. Describe Flood Evacuation Plan with regard to Proposed Project.
4. Proposed Mitigation
- a. Discuss appropriate mitigation measures to reduce identified impacts.

F. Stormwater Management

1. Existing Conditions
 - a. Discuss existing drainage patterns (including regional watershed and on-site drainage) and their relationship to the Project Site.
 - b. Discuss soil conditions and soil testing information.
 - c. Discuss existing stormwater and drainage infrastructure on the site.
 - d. Discuss relevant Town, County and State Stormwater Management and Erosion and Sediment Control regulations.
2. Future without the Proposed Project
 - a. Describe the conditions on the Project Site without the proposed Project.
3. Potential Impacts as a result of the Proposed Project
 - a. Describe the components and function of the proposed drainage system.
 - b. Describe the applicability of the site as a redevelopment project under State regulations.
 - (1) Discuss State water quantity requirements for redevelopment projects with an increase in impervious cover.
 - (2) Discuss Delaware River's 5th order or larger water body classification.
 - (3) Discuss ramifications of detaining 10- and 100-year storm events on the Project Site as opposed to discharging to the Upper Delaware River.

- c. Discuss the proposed erosion and sediment control plan and material components of the SWPPP.
 - d. Discuss the proposed stormwater management (quantity and quality) plan and SWPPP, including "green infrastructure" practices.
 - (1) Discuss State water quality requirements for redevelopment projects with an increase in impervious cover.
 - e. Discuss ownership and maintenance of stormwater management facilities.
 - f. Discuss compliance with relevant Stormwater Management and Erosion and Sediment Control regulations.
4. Proposed Mitigation
- a. Discuss appropriate mitigation measures to reduce identified impacts.

G. Sanitary Sewage

- 1. Existing Conditions
 - a. Describe existing wastewater generation.
 - b. Describe existing on-site wastewater conveyance and disposal system.
 - c. Describe existing compliance with applicable permits.
- 2. Future without the Proposed Project
 - a. Describe the conditions on the Project Site without the proposed Project.
- 3. Potential Impacts as a result of the Proposed Project
 - a. Discuss estimated Project-generated wastewater volume.
 - b. Describe proposed improvements to wastewater distribution and disposal.
 - c. Describe the Proposed Project's compliance with applicable permits.
- 4. Proposed Mitigation
 - a. Discuss appropriate mitigation measures to reduce identified impacts.

H. Vegetation and Wildlife

- 1. Existing Conditions

- a. Obtain data from the NYSDEP and the USFWS regarding potential Rare, Threatened and Endangered species on and in the vicinity of the site.
- b. Describe existing NYSDEC significant natural community.
- c. Discuss potential for regulated species on the Project Site.
2. Future without the Proposed Project
 - a. Describe conditions on the Project Site without the proposed Project.
3. Potential Impacts as a result of the Proposed Project
 - a. Discuss impacts to regulated species.
 - b. Discuss impacts to NYSDEC significant natural community.
 - c. Discuss Project related tree removal and describe areas of Site impacted and reasons for tree removal.
 - (1) Describe tree clearing timing restrictions, as applicable.
 - (2) Describe any tree removal within 200 feet of Upper Delaware River shoreline.
 - (3) Describe any White Pine tree removal within 300 feet of Upper Delaware River shoreline.
 - (4) Describe any White Pine tree removal within 300 feet of Upper Delaware River shoreline.
 - (5) Describe any White Pine trees greater than 25" diameter at breast height (dbh) removed anywhere on the Site.
 - d. Describe loud construction noise timing, duration, and location.
 - e. Identify required permits.
 - f. Provide agency consultation correspondence.
4. Proposed Mitigation
 - a. Discuss appropriate mitigation measures to reduce identified impacts.
- I. Traffic, Transportation, Pedestrians and Transit
 1. Existing Conditions
 - a. Describe the roadway network and local intersections serving the site, including number of lanes, speed limits, sidewalks and crosswalks, and traffic control.
 - b. Describe bicycle use of NYS Route 97
 - c. Describe the use of NYS Route 97 as an evacuation route.

- d. Discuss existing emergency access.
 - e. Qualitatively describe traffic around the site during peak camping times, with consideration of check in/out and canoe livery operations.
 - f. Qualitatively describe traffic and parking conditions at the Route 97 and Route 55 intersection on weekends during operation of the Farmer's Market.
 - (1) Provide estimates for total vendors, volunteers.
 - (2) Consider availability of parking on Route 97 and any disruption to traffic.
 - (3) Assess existing number of parking spaces within funeral home parking lot and traffic circle off River Road.
 - (4) Estimate typical Saturday attendance using a range, if applicable.
 - (5) Discuss peak arrival and departure times.
 - g. Discuss potential solutions to issues identified for the Town to consider.
2. Future Without the Proposed Project
- a. Discuss planned, proposed or underway traffic improvements.
3. Potential Impacts of the Proposed Project
- a. Qualitatively discuss the impact of existing site-generated volumes on traffic conditions.
 - b. Discuss implementation of Pedestrian Ahead signs on NYS Route 97 and evaluate pedestrian and bicycle safety conditions.
 - c. Discuss change in Site access and effect on NYS Route 97 operation.
 - d. Describe impact to bicycle use of NYS Route 97
 - e. Describe impact to use of NYS Route 97 as an evacuation route.
 - f. Discuss internal site vehicular circulation changes, including transient RV entry/exit and check in/out operations.
 - g. Identify the parking requirements based on the Town Code and compare with estimated parking demand and the proposed to be included on the Site.
 - h. Describe any change to canoe livery operations.
 - i. Discuss any change to emergency access.
4. Proposed Mitigation.

- a. Discuss appropriate mitigation measures to reduce identified impacts.

J. Community Services

1. Existing Conditions
 - a. Describe available police services.
 - b. Describe available fire and emergency services (EMS).
 - c. Describe policies on safety (including River), drugs, alcohol, and firearms.
2. Future without the Proposed Project
 - a. Describe community services available to the Project Site without the proposed Project.
3. Potential Impacts as a result of the Proposed Project
 - a. Discuss potential impacts to police services based upon consultation with provider.
 - b. Discuss potential impacts to fire and EMS services based upon consultation with service providers.
4. Proposed Mitigation
 - a. Discuss appropriate mitigation measures to reduce identified impacts.

K. Historic and Cultural Resources

1. Existing Conditions
 - a. Describe eligible and listed resources on the National and State Registers of Historic Places that are on or substantially contiguous to the Site.
2. Future without the Proposed Project
 - a. Describe conditions on the Project Site without the proposed Project.
3. Potential Impacts of the Proposed Project
 - a. Describe potential direct and indirect impacts to cultural resources.
 - b. Provide consultation correspondence with the New York State Office of Parks, Recreation and Historic Preservation (NYSOPRHP) Cultural Resources Information System (CRIS).
4. Proposed Mitigation

- a. Discuss appropriate mitigation measures to mitigate any identified impacts.

L. Noise

1. Existing Conditions
 - a. Provide a list of sensitive noise receptors within 500 feet of the Project Site.
 - b. Describe the Town's Chapter 190-39 Noise standards.
 - c. Provide ambient sound readings.
 - d. Provide a qualitative description of the existing sound environment.
2. Future Without the Proposed Project
 - a. Describe conditions on the Project Site without the proposed Project.
3. Potential Impacts of the Proposed Project
 - a. Qualitatively evaluate temporary construction noise impacts.
 - b. Describe Proposed Project's contribution to ambient sound conditions.
 - c. Describe compliance with Town Chapter 190-39.
4. Proposed Mitigation
 - a. Discuss appropriate mitigation measures to mitigate any identified impacts.

IV. ALTERNATIVES

The analysis of reasonable alternatives to the Proposed Project will be based on schematic concept plans, with impacts discussed in accordance with the environmental resource sections described above. The alternatives will include:

- The "No Action" Alternative
- Alternative A - No Aquatic Center and removal of related utility infrastructure

V. SIGNIFICANT ADVERSE IMPACTS THAT CANNOT BE AVOIDED

Identification of those adverse environmental impacts that cannot be avoided or adequately mitigated if the proposed action is implemented.

VI. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

Identification of those natural and man-made resources consumed, converted or otherwise made unavailable for future use as a consequence of the Proposed Project.

VII. GROWTH INDUCING ASPECTS

A description and analysis of potential growth-inducing aspects or further development which the proposed action may support or encourage, will be provided and mitigation measures discussed if necessary.

VIII. EFFECTS ON THE USE AND CONSERVATION OF ENERGY RESOURCES

A description of the effect of the Proposed Project on the short and long term use and conservation of energy resources will be provided including ways to reduce inefficient or unnecessary consumption during construction and long term operation for the proposed action and all alternatives.

VIII. APPENDICES

- A. SEQRA Notices and Filings
- B. Scoping Document
- C. Involved and Interested Agency/Organization Correspondence
- D. Traffic Impact Analysis
- E. Stormwater Pollution Prevention Plan (SWPPP)
- F. Cultural Resources Report(s)
- G. Wetland Delineation Report
- H. Protected Species Habitat Report
- I. Others as required



Kenneth D. Ellsworth, P.E.
Managing Member

Paul L. Bedford, AIA
Architect

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Land Surveyor

Kordian W. Wichtowski, R.A.
Architect

November 29, 2023

Mr. Norman Sutherland
Chairman
Town of Highland Planning Board
4 Proctor Road
Eldred, New York 12732

Re: Camp Fimfo

Dear Chairman Sutherland:

We have reviewed the following public comments received in response to the published draft scoping document for the above project:

1. Comment on Draft Scoping Document, Cherise Barasch, dated 10/27/2023.
2. Comment on Draft Scoping Document and Delaware Riverkeeper Network, Ken Schleife, 10/27/2023.
3. Comment on Draft Scoping Document, Linda DeBoer, 10/27/2023.
4. Comment on Draft Scoping Document and Delaware Riverkeeper Network, Maya Van Rossum, 10/27/2023.
5. Comment on Draft Scoping Document, Penelope Floor, 10/27/2023.
6. Comment on Draft Scoping Document, Stephanie Ulmer, 10/27/2023.
7. Comment on Draft Scoping Document and Delaware Riverkeeper Network, Suzanne Klewan, 10/27/2023.
8. Comment on Draft Scoping Document. Tesla DeBoer, 10/27/2023.
9. Comment on Draft Scoping Document, Bill Coneghen, 10/27/2023.
10. Comment on Draft Scoping Document and Delaware Riverkeeper Network, Franklin Roth, 10/28/2023.
11. Comment on Draft Scoping Document and Delaware Riverkeeper Network, Kathy Dabanian, 10/28/2023.
12. Comment on the Draft Scoping Document, Amy Gable, dated 10/29/2023.
13. Comment on Draft Scoping Document and Delaware Riverkeeper Network, Mike Madden, 10/29/2023.
14. Comment on Draft Scoping Document, Scott Van Gorder, 10/29/2023.
15. Comment on Draft Scoping Document and Delaware Riverkeeper Network, Anie Stanley, dated 10/30/2023.
16. Comment on Draft Scoping Document and Delaware Riverkeeper Network, Colleen Gutwein O'Neal, 10/30/2023.
17. Comment on Draft Scoping Document and Delaware Riverkeeper Network, Dale Goodman, 10/31/2023.
18. Comment on Draft Scoping Document and Delaware Riverkeeper Network, Louise Washer, 10/31/2023.
19. Comment on Draft Scoping Document and Delaware Riverkeeper Network, Linda Smith, 10/31/2023.
20. Comment on Draft Scoping Document and Delaware Riverkeeper Network, Vic Dasaro, 10/31/2023.
21. Comment on Draft Scoping Document and Delaware Riverkeeper Network, Gail Brunner, 11/1/2023.
22. Comment on Draft Scoping Document, Paula Campbell, 11/2/2023.
23. Comment on Draft Scoping Document and Delaware Riverkeeper Network, Fiona Raby, 11/2/2023.
24. Comment on Opposition to Project, Harry Shifman, 11/4/2023.

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25. Comment on Draft Scoping Document, Margie Granese, 11/4/2023.
26. Comment on Draft Scoping Document, Ryan Dodson, 11/4/2023.
27. Comment on Delaware Riverkeeper Network, Linda DeBoer, 11/5/2023.
28. Comment on Draft Scoping Document, Tesla DeBoer, 11/5/2023.
29. Comment on Draft Scoping Document, Marie Carota, 11/6/2023.
30. Comment on Draft Scoping Document, Mary Jones-Mellett, 11/6/2023.
31. Comment on Draft Scoping Document, Sondra Wolferman, 11/6/2023.
32. Comment on Delaware Riverkeeper Network, Erik Freeland, 11/7/2023.
33. Comment on Draft Scoping Document and Delaware Riverkeeper Network, Leslie Hess, 11/7/2023.
34. Delaware Riverkeeper Network Comments on Camp FIMFO Draft Scoping Document, Delaware Riverkeeper Network, dated 11/9/2023.
35. Comment on Draft Scoping Document, Environmental Impact Statement, George M. Janes, 11/9/2023.
36. Comments on Draft DEIS Scoping Document for the Camp FIMFO Modernization and Improvement Project, National Park Service, dated 11/17/2023.
37. Draft Scoping Document, Delaware Riverkeeper Network, dated 11/18/2023.
38. Comment on Draft Scoping Document and Delaware Riverkeeper Network, Nina Burleigh, 11/18/2023.
39. Comment on Draft Scoping Document and Delaware Riverkeeper Network, Amy Yoes, 11/18/2023.
40. Comment on the Draft Scoping Document and Delaware Riverkeeper Network, Karen Matsu Greenberg, 11/20/2023.
41. Press Inquiry, Cloey Callahan, 11/21/2023.
42. Comment on the Draft Scoping Document, Janet Poppendieck, 11/21/2023.
43. Comment on the Draft Scoping Document, John Back, 11/21/2023.
44. Comment on the Draft Scoping Document, Mike Edison, 11/21/2023.
45. Comment on the Draft Scoping Document and Delaware Riverkeeper Network, Maya van Rossum, 11/21/2023.
46. Comment on the Draft Scoping Document, Kerry Engelhardt, 11/22/2023.
47. Comment on the Draft Scoping Document, Julius Robinson, 11/24/2023.
48. Comment on Draft Scoping Document and Delaware Riverkeeper Network, Art Satter, dated 10/27/2023.
49. Comment on Environmental Impact Statement pursuant to SEQRA, Charles Karazia, 10/27/2023.
50. Comment on Draft Scoping Document, Ted Weiner, 11/4/2023.
51. Comment on Draft Scoping Document, Lynette Saunders, 11/5/2023.
52. Comment on Draft Scoping Document and Delaware Riverkeeper Network, Jane Panico, 11/8/2023.
53. Public Comment on Scoping Document RE: Camp FIMFO Resort — For Draft Environmental Impact Statement (DEIS), Ms. Christine Martin, dated 11/20/23.
54. Comment on Delaware Riverkeeper Network, Michael Sussman, 11/21/2023.
55. Comment on the Draft Scoping Document, Jennifer Taylor, NYSDOT, 11/22/2023.
56. Delaware Riverkeeper Network Supplemental Comments regarding Camp FIMFO.

The scoping document acts as a table of contents for the Draft Environmental Impact Statement (DEIS). The Planning Board and its consultants will review the DEIS to ensure that the material presented in the scoping document is included with sufficient detail in the DEIS. The DEIS will not be accepted as complete until the Planning Board feels the information has been presented adequately. Upon determining that the DEIS is complete, the Board will publicly publish and notice the DEIS and open a public comment period. The Final EIS will respond to public comments received on the DEIS and will include all public comments received on the DEIS. Following the acceptance

of the FEIS as complete by the Planning Board, following a review for sufficient responses, the Planning Board will issue a Findings Statement. We advise and recommend the following (in bold) actions regarding the scoping document.

1. **Camp FIMFO Draft Scoping Document Comment Period**

The NYSDEC recommends that a 20-day period for public review is reasonable under most circumstances. We recommend that the period is suitable given that the project has been under review for nearly two years, including 3 public hearings. The public comment period was noticed in the River Reporter and Sullivan County Democrat.

2. **Environmental Impact Statement Comment & Hearing Process.**

The NYSDEC recommends a minimum comment period of 30 days. Public hearings are not required. If a public hearing is held, the comment period is extended another 10 days. Our recommendation is that it is premature to determine public comment and hearing details at this point until the DEIS has been reviewed and accepted as complete.

3. **Complete/Updated Project Review for DEIS**

The project presented in the project description of the Draft Scope is the current project. Previously the project included an additional recreation element that was abandoned a year ago. All plans/permits under review with regulatory agencies represent the current project. The Board asked that it be copied and included on all agency submissions, and this has occurred. The Applicant has confirmed that there is no future phase of the project and that the full project is being sought now. For clarification purposes, future expansion areas for septic systems are required as part of the permitting process. These areas are required and do not indicate future development. They are intended for redundancy in the event a septic fails.

4. **Reasonable Worst-Case Development Scenario**

The project proposed has undergone substantial detailed engineering and is not at a concept phase. Therefore, there is no question that the analysis will consider the reasonable worst-case development for the site.

5. **Site History**

A factual presentation of the site's history (use, development, etc.) is typical in an EIS and assists in understanding the overall context. We recommend that the scoping document is sufficient as is and should not be changed.

6. **No Action Alternative**

NYSDEC requires a No Action Alternative in the EIS, "The no action alternative discussion should evaluate the adverse or beneficial site changes that are likely to occur in the reasonably foreseeable future, in the absence of the proposed action." We recommend that the scoping document is sufficient as is and should not be changed.

7. Tribal Consultation

No tribal consultation was required as part of this project review because no archaeological sites were identified. Furthermore, The New York State Office of Parks, Recreation, and Historic Preservation (NYSOPRHP) was consulted on the project. Per Directive HP-POL-005, NYSOPRHP will engage tribal coordination on projects as needed. The NYSOPRHP reviewed the Phase IA/IB and did not direct tribal consultation nor did they direct further analysis and review. We recommend that the scoping document is sufficient as is and should not be changed.

8. Legal Limitations on undeveloped Project Site areas

No legal limitations are proposed for the undeveloped project site area. We recommend that the scoping document is sufficient as is and should not be changed.

9. Change in cost structure

The RV campground currently offers temporary camping structures at their campsites. The proposed project will increase the number of these types of campsites but will not remove regular tent sites all together. We defer to the Planning Board Attorney, but the change in cost does not appear to be under the purview of the Planning Board. We recommend that the scoping document is sufficient as is and should not be changed.

10. Floodplain, aquatic, steep slopes and natural resource impacts

The scope addresses these in Section III C, E and H. Information is also available as part of the site plan set. We recommend that the scoping document is sufficient as is and should not be changed.

11. Invasive species

Construction protocols, such as those that protect against invasive species, will be implemented at final site plan approval. Additionally, the Stormwater Pollution Prevention Plan and Erosion and Sediment Control practices will assist in these efforts. We recommend that the scoping document is sufficient as is and should not be changed.

12. Aquatic and mini golf area

- a. Location in floodplain
This is addressed in Section III E.
- b. Use of chemicals
This is addressed in Section II B and III E.
- c. Lighting
This is addressed in Section II B and III B and is included in the site plan set.
- d. Existing habitat
This is addressed in Section II A and III C, E, and H.

e. Water usage

This is addressed in Section III D and within the site plan set.

We recommend that the scoping document is sufficient as is and should not be changed.

13. Decommissioning of septic systems

The State's Department of Health (NYSDOH) has purview over the sanitary infrastructure on site. As part of the permitting process septic systems identified for disuse will be decommissioned per standard protocol. We recommend that the scoping document is sufficient as is and should not be changed.

14. Parking

The proposed project includes a total of 286 parking spaces. This information is provided in Sections II B and III I and F. We recommend that the scoping document is sufficient as is and should not be changed.

15. Vehicular and roadway improvements and maintenance

This information is provided in Sections II B and III C and I. Site roadways for the seasonal use already exist for the most part. We recommend that the scoping document is sufficient as is and should not be changed.

16. Tree removal

This information is provided in Sections II B and III C and H. We recommend that the scoping document is sufficient as is and should not be changed.

17. Operation times

This information is provided in Sections II B. No extension beyond the current operating season is proposed. We recommend that the scoping document is sufficient as is and should not be changed.

18. Site Layout – buildings

This information is provided in Sections II B. We recommend that the scoping document is sufficient as is and should not be changed.

19. Impervious coverage, stormwater management

This information is provided in Sections II B and III F. The project includes green infrastructure techniques. We recommend that the scoping document is sufficient as is and should not be changed.

20. Domestic and sanitary wastewater engineering and impacts

This information is provided in Sections II B and III D and G. Information is also provided in the site plan set. We recommend that the scoping document is sufficient as is and should not be changed.

21. Community services and taxes

The project includes no schoolchildren. Impacts to community service providers requires consultation with providers and is discussed in Section III J. We recommend that the scoping document is sufficient as is and should not be changed.

22. Traffic

There is no increase in the total number of campsites and the occupancy of the new units is less than the tent campsites. Potential impacts to traffic are discussed in Section III I. We recommend that the scoping document is sufficient as is and should not be changed.

23. Soil Investigations

Soil investigation data was provided for all septic system locations. This information will be discussed in Sections III C and G. We recommend that the scoping document is sufficient as is and should not be changed.

24. Land Use Impacts, Community Character Impacts, Visual Impacts

Compatibility issues are discussed in several sections of the scope, including Sections III A and B. We recommend that the scoping document is sufficient as is and should not be changed.

25. Barnes Waste Site

This issue was fully addressed and removed as a potential issue in the Environmental Assessment and is under the purview of the NYS Department of Environmental Conservation (NYSDEC). We recommend that the scoping document is sufficient as is and should not be changed.

26. Pedestrian Safety

Pedestrian safety is addressed in Section II B and III I. We recommend that the scoping document is sufficient as is and should not be changed.

27. Bald Eagle Impacts

Impacts to Bald Eagles is addressed in Section III H. We recommend that the scoping document is sufficient as is and should not be changed.

28. Aquatic Impacts

The project involves no filling or encroachment in aquatic resources. Potential impacts from stormwater and erosion are discussed in Sections II B and III F. We recommend that the scoping document is sufficient as is and should not be changed.

29. Alternative fuel sources

Alternative fuel sources are not proposed as part of the project. We recommend that the scoping document is sufficient as is and should not be changed.

30. Tax Benefits

This issue was fully addressed in the Environmental Assessment and is not under the purview of the Planning Board. We recommend that the scoping document is sufficient as is and should not be changed.

31. Food Service

This information is provided in Section II B. The project does not include a public restaurant. We recommend that the scoping document is sufficient as is and should not be changed.

32. Landscaping

This information is provided in Section II B. We recommend that the scoping document is sufficient as is and should not be changed.

33. National Park Service – Substantial Conformance Finding

This review is discussed in Section III A. We recommend that the scoping document is sufficient as is and should not be changed.

34. Campsite upgrades (change from Tent to RV)

This information is provided in Section II B and III A. The scope should be revised to include a differentiation between RV pads (for guests to bring their own RVs) and Park Model RVs and other site types where the RVs remain on the property year-round for the proposed project.

35. Cumulative Impacts

The scope includes consideration of the future without the proposed project which will identify potential cumulative impact issues, which are then folded into the potential impacts from the proposed project discussions. We recommend that the scoping document is sufficient as is and should not be changed.

36. Defining Terms

The scope discusses the project according to the applicable defined terms (Chapter 190, recreational vehicle and temporary dwellings) as stipulated in the Town's zoning regulations, see Section II A. We recommend that the scoping document is sufficient as is and should not be changed.

37. Lighting

This is addressed in Section II B and III B and is included in the site plan set. We recommend that the scoping document is sufficient as is and should not be changed.

38. Required approvals

This information is provided in Section I C. We recommend that the scoping document is sufficient as is and should not be changed.

39. Solid waste and air quality

A discussion of existing and future solid waste conditions, including potential impacts, is not included because this subject was adequately addressed in a prior environmental review. We recommend that the scoping document is sufficient as is and should not be changed.

40. Emergency Management

Emergency services, including flood hazard preparation and action plan, are included in Sections III E, I and J. We recommend that the scoping document is sufficient as is and should not be changed.

41. Significant environmental conditions and resources

Significant environmental conditions and resources are discussed in Section III. We recommend that the scoping document is sufficient as is and should not be changed.

42. Prior Project information (e.g., studies, analyses)

Prior information provided to the Planning Board and Involved/Interested Agencies will be included in the EIS. The scoping document is not written in exhaustive detail, but the DEIS will be reviewed to ensure this information is present. We recommend that the scoping document is sufficient as is and should not be changed.

43. Project Description

The Project Description is meant to provide detailed information about the proposed project. Section III will provide information on potential impacts from the proposed project. We recommend that the scoping document is sufficient as is and should not be changed.

44. Future without the proposed project

The future without the proposed project or No-Action Scenario or Condition is defined in the SEQR regulation as: Scenario of the future without the proposed action, used as a baseline against which incremental changes generated by an action are evaluated in environmental review. We recommend that the scoping document is sufficient as is and should not be changed.

45. Upper Delaware River

The scope should be revised to accurately refer to the River as the Upper Delaware River.

46. Occupancy

The scope should be revised to specify occupancy at each campsite currently and occupancy at the campsites following the proposed project. To the extent it is available, historic occupancy information should be provided as well.

47. Visual Simulations

The existing conditions work discussed in Section III B will assist the Planning Board in determining locations requiring additional analysis. The Planning Board will need to work with the Applicant by providing them a list of locations from which additional simulations should be provided, as necessary. It would be premature to provide this list now. We recommend that the scoping document is sufficient as is and should not be changed.

48. Historical groundwater Issues

Over the course of the nearly two-year project review, no discussion of historic groundwater supply issues has been raised. We recommend that the scoping document is sufficient as is and should not be changed.

49. Historic Flood Events

The scope includes the pertinent information and methodology for determining flooding impacts. A recitation of prior historic flooding events is not necessary. We recommend that the scoping document is sufficient as is and should not be changed.

50. Regulated species

This information is provided in Section III H. The project has undergone consultation with the NYSDEC to determine requirements for the impact review and the methodology was determined by NYSDEC. We recommend that the scoping document is sufficient as is and should not be changed.

51. NYS Route 97

The scope should be revised to include information about NYS Route 97 as State Bike Route 17 and as an evacuation route.

52. NYS Route 97 and NYS Route 55

The scope provides methodology for assessing potential traffic and parking congestions issues and requests consideration of solutions. This information can only be determined after information and data is collected. We recommend that the scoping document is sufficient as is and should not be changed.

53. Demographics and Community Services

The use is seasonal and camper stays are temporary. Community service providers will still attend to the campsites. Demographics are not included because this is not a substantive issue as there are no potential schoolchildren or full-time residents. We recommend that the scoping document is sufficient as is and should not be changed.

54. Historic and Cultural Resources

The historic and cultural resource analysis used methodology approved by the NYS Office of Parks, Recreation and Historic Preservation. The disturbance to the site is largely in previously disturbed areas. We recommend that the scoping document is sufficient as is and should not be changed.

55. Noise

The analysis uses an industry standard sound propagation modeling software to determine sound levels from the future camp. We recommend that the scoping document is sufficient as is and should not be changed.

56. Precedence

An approval of this project is not binding on future projects as the use is a defined term in the Town's zoning regulations that is permitted at this site. Therefore, no new precedent would occur as the project follows the existing law. We recommend that the scoping document is sufficient as is and should not be changed.

57. Growth Inducing Aspects

Section VII of the scope addresses growth inducing aspects. We recommend that the scoping document is sufficient as is and should not be changed.

58. New York State's 2019 Climate Leadership and Community Protection Act.

A discussion of how the project would align with the New York State 2019 Climate Leadership and Community Protection Act is not included because the project does not have significant energy impacts. We recommend that the scoping document is sufficient as is and should not be changed.

59. Existing campsite types

The scope should be revised to include current number of tent, pull-in RV, park model RV, etc. sites.

60. Community Character/Visual

The scope should be revised to include the historic presence of campsites on site, including the type of campsite (e.g. tent vs RV pad vs park model RVs,) and what year(s) they were added to the project site to the extent known.

61. Removal of Park Model RVs off site during off-season

This is not a feasible option for the Applicant to pursue because it cannot be addressed on site or within a reasonable distance. We recommend that the scoping document is sufficient as is and should not be changed.

62. Pool Filling and Draining

The scope should be revised to include a description of pool filling and draining procedures, including source of water and draining outlet(s).

63. Groundwater mounding below the proposed stormwater basin(s).

The scope should be revised to discuss soil conditions and soil test information relative to proposed stormwater management practices.

64. D&H Canal

Information about the Canal will be included as part of Section III K. Section III C includes protective construction measures. We recommend that the scoping document is sufficient as is and should not be changed.

65. Interpretive Signage D&H Canal

The Applicant is not proposing interpretive signage for the D&H Canal. NYS Office of Parks, Recreation and Historic Preservation determined the proposed project would have no impact on the D&H Canal. We recommend that the scoping document is sufficient as is and should not be changed.

66. Minimum area per campsite

This information is provided in Section III A as derived from Town Zoning Chapter 190-25. We recommend that the scoping document is sufficient as is and should not be changed.

67. River Riders

Information on canoe livery operations is included in Section II B and III I. We recommend that the scoping document is sufficient as is and should not be changed.

68. Shoreline erosion

Shoreline erosion has not been raised as an issue and is not a current concern. We recommend that the scoping document is sufficient as is and should not be changed.

69. Excavation

Information is provided in Section II B and III C. We recommend that the scoping document is sufficient as is and should not be changed.

70. New employment

A discussion of new employee salaries and housing is not included because this is not a substantial issue due to the seasonal operation of the facility and the Planning Board has no purview over employee salaries. We recommend that the scoping document is sufficient as is and should not be changed.

71. Environmental Monitoring

The project is subject to several permits and approvals by regulatory agencies. As such, the project will not be built or become operational without these permits and approvals. To the extent environmental monitoring is required, this will be determined by the authority regulated the resource. The Planning Board has no purview over how other agencies enforce the conditions of their permits or approvals. We recommend that the scoping document is sufficient as is and should not be changed.

72. Noise complaints

Noise is regulated by Town Code Section 190-39. The scope includes a noise analysis and discussion of the project's compliance with the Noise code. We recommend that the scoping document is sufficient as is and should not be changed.

73. Safety concerns, drugs, alcohol and firearms

The scope should be revised to include a discussion of the facility's policies on safety (including river), drugs, alcohol and firearms.

74. Native Landscaping Species

The scope should be revised describe whether landscaping uses native species.

75. Animal control and pesticides

A discussion of animal control and pesticides should not be included in the scope because there is no addition of campsites and the area of disturbance is generally within areas already disturbed. We recommend that the scoping document is sufficient as is and should not be changed.

76. Larger Habitat and Species Analyses

A discussion and analysis of impacts to non-regulated species and habitat should not be considered because the area of disturbance is generally within areas already disturbed. We recommend that the scoping document is sufficient as is and should not be changed.

77. Water quality

Measures to control potential impacts to water quality are discussed in Section III C, E, F, and G. We recommend that the scoping document is sufficient as is and should not be changed.

78. Fire Danger

A discussion of fire danger should not be included in the scope because it has not been raised as a significant issue by emergency service personnel, nor does the area have a known issue with fire. All facilities will meet applicable requirements for fire protection. We recommend that the scoping document is sufficient as is and should not be changed.

79. Sustainability practices

The scope should be revised to include a description of any sustainability practices used in operation and construction of the facility.

80. Decommissioning Plan

A decommissioning plan should not be included in the scope because the new park model RVs are not affixed to the ground. We recommend that the scoping document is sufficient as is and should not be changed.

81. Laundry facility

Water usage is described in Section II B and Section III D and G. Electrical demand was analyzed in the environmental assessment and the project is not a significant source. We recommend that the scoping document is sufficient as is and should not be changed.

82. Effects of disadvantaged communities, including cause or increase in a disproportionate pollution burden on a disadvantaged community

The scope should be revised to include a discussion of the effects of any proposed action on disadvantaged communities, including whether the action may cause or increase a disproportionate pollution burden on a disadvantaged community.

83. Rename project

The project is known generally as Camp Fimfo, but has regularly been submitted by the Applicant under the name Camp Fimfo Modernization and Improvement Project. Changing the name would disrupt the record and is not necessary given it is still known as Camp Fimfo. We recommend that the scoping document is sufficient as is and should not be changed.

84. Project records

The Scope should be revised to indicate the appendix for correspondence will include correspondence from involved and interested parties. Other project record information is available at the Town.

85. Promises and Unofficial Correspondence

The scope outlines the proposed project and potential impacts from the proposed project in addition to other information. To the extent that the Applicant commits to something not included as part of the project at this time, it will be disclosed as part of the EIS process. Cataloging of unofficial correspondence is not the role of the EIS. We recommend that the scoping document is sufficient as is and should not be changed.

86. Public comments in DEIS

Public comments in response to the DEIS will be included in the FEIS. Public comments are not included in the DEIS. We recommend that the scoping document is sufficient as is and should not be changed.

87. Water usage data

The NYS Department of Health has purview over the water supply treatment and distribution design and has not requested this data. No additional wells are proposed. The Applicant is not seeking a waiver on sanitary design requirements for volumes. For these reasons, we recommend that the scoping document is sufficient as is and should not be changed.

88. Property value

Property value is not considered an environmental factor considered under SEQR. For these reasons, we recommend that the scoping document is sufficient as is and should not be changed.

89. Redevelopment criteria for stormwater design

The rationale is discussed in Section III F. We recommend that the scoping document is sufficient as is and should not be changed.

90. Compaction affecting stormwater management

Information about the effectiveness of stormwater management practices proposed for the site are detailed in the Stormwater Pollution Prevention Plan (SWPPP), which will be an appendix to the DEIS. We recommend that the scoping document is sufficient as is and should not be changed.

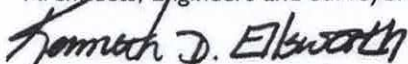
91. Segmentation

There is no information to date that indicates there is another plan for the site other than what has been proposed. We recommend that the scoping document is sufficient as is and should not be changed.

We trust we have responded to your request. If you have any questions, please contact our office.

Respectfully,

Keystone Associates
Architects, Engineers and Surveyors, LLC



Kenneth D. Ellsworth, P.E.
Managing Member

KDE:las



Upper Delaware Council

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November 22, 2023

Monica McGil, Secretary
Planning Board
Town of Highland
planningboardzba@townofhighland.com
(sent via email)

**RE: UDC2022-03 / Camp FIMFO - Modernization and Improvement Project, UDC
Comments on Draft Scoping Document**

Dear Ms. McGil:

The Project Review Committee of the Upper Delaware Council has reviewed the Draft Environmental Impact Statement (DEIS) Draft Scoping Document, and offers the following comments, numbered to correspond with same:

II. Description of the Proposed Project

A. 3. Repeated reference to the "Delaware River" and in particular the "Delaware River Recreational Segment" should be revised to **Upper** Delaware River to reflect the 1978 Congressional Designation.

A. 6. The description of existing facilities should include the current number of tent, pull-in RV, park model RV, etc sites on the property.

B. 3. b. The description the proposed campsite overnight accommodation upgrades should differentiate between RV pads (for guests to bring their own RVs) and Park Model RVs and other site types where the RVs remain on the property year-round.

B. 21. a. Are there any additional roadways proposed besides emergency access? These should be discussed.

III. Existing Conditions, Potential Impacts as a Result of the Proposed Project and Proposed Mitigation

A. 3. a & c. Again the word "Upper" should be included when describing the river, and the River Management Plan.

B. 1. Specify the number of different types of campsites (e.g. tent vs RV pad vs park model RVs,) and what year(s) they were added to the project site.

Working together to conserve the Upper Delaware Scenic and Recreational River

*Town of Hancock • Town of Fremont • Town of Delaware • Town of Cohecton • Town of Tusten • Town of Highland • Town of Lumberland
Town of Deerpark • Damascus Township • Berlin Township • Lackawaxen Township • Shohola Township • Westfall Township*

B. 4. Discuss the option of removing the park model RVs from the site during the off-season (to better fit the definition of a “temporary” structure), and the potential environmental impacts of same.

D. 1. Discuss the number of existing permanent water hookups for campsites, and when they were constructed.

D. 3. Include the number of permanent water hookups being proposed.

E. 3. Discuss the impact of the chlorine pool in the floodplain (this has been an issue repeatedly raised by members of the public):

- The impact of the volume of the pool entering the river during a flood event
- How and where the pool chemicals will be stored
- How and to where the pool will be drained each season
- How and from where the pool will be filled each season

F. 3. Discuss potential groundwater mounding below the proposed stormwater basin(s).

G. 1. Discuss the number of existing permanent sewer hookups for campsites, and when they were constructed.

G. 3. Include the number of permanent sewer hookups being proposed.

H. 3. c. All trees (regardless of species) to be removed should be discussed and catalogued. We recommend a count of all trees 6” DBH and higher, since it’s the smaller diameter trees that have the most potential to grow and be useful habitat in the future.

Additionally, any evidence of hemlock woolly adelgid or emerald ash borer should be discussed. Also, any clearing near the Beaver Brook must be discussed specifically, and how that clearing will affect the temperature of that stream.

H. 3. d. Compare the environmental impacts of blasting (which may only have to occur a few times) versus impact hammering (which is not as loud, but may have to occur over a longer period of time) on local species (not just endangered/threatened ones)

I. 1. c & d. Existing traffic should be discussed quantitatively, not qualitatively, with traffic counts conducted

I. 3. a. Proposed traffic should also be discussed quantitatively, rather than qualitatively. Real occupancy numbers from the past two seasons should be used to estimate future traffic generation under proposed conditions.

J. 1. Descriptions of existing conditions should include usage of police/EMS services at the project site over the last few seasons.

K. 1. Should include the location and condition of the D&H Canal or historic remnants on-site.

K. 3. Should propose interpretive signage for the canal, and describe how that area will be protected during and after construction.

M. Lighting impacts should be included in the DEIS. Existing lighting levels and proposed lighting levels should be discussed.

Thank you for your time and attention to this matter, and for the opportunity to comment on the scoping document. As always, the UDC is available for questions or consultation regarding the implementation of the Land and Water Use Guidelines of the River Management Plan of the Upper Delaware Scenic and Recreational River.

Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kerry Engelhardt".

Kerry Engelhardt, P.E.
Resources and Land Use Specialist

cc: Larry Richardson, Project Review Committee Chairperson
Andy Boyar, Town of Highland UDC Rep
Lindsey Kurnath, Superintendent, Upper Delaware Scenic & Recreational River
Caren LoBrutto, LaBella Associates
Scott Campbell, Northgate Resorts

