

## Planning Board and Zoning

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**From:** ckarazia@optonline.net  
**Sent:** Friday, October 27, 2023 12:21 PM  
**To:** Planning Board and Zoning  
**Subject:** URGENT ACTION REQUIRED---NORTHGATE RESORTS CAMP FIMFO PROPOSAL

Dear Sir or Madam:

Given that the Northgate Resorts Camp Fimfo proposal will most certainly inflict significant environmental and community impact, SEQRA demands that the Town of Highland Planning Board secure/prepare a full Environmental Impact Statement pursuant to SEQRA, basing a decision on a mere Environmental Assessment, as the Planning Board seems to be proposing, does not fulfill the legal mandates of SEQRA. In addition, based on all we know to date, as well as continuing information gaps in what Northgate Resorts has provided regarding proposed Camp FIMFO, it would be irresponsible and unjustified for the Town of Highland Planning Board to issue a Negative Declaration pursuant to SEQRA.

Thank you for all consideration afforded the above request.

Charles P. Karazia

## Planning Board and Zoning

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**From:** Amy Yoes <ayoes@saic.edu>  
**Sent:** Saturday, November 18, 2023 11:58 AM  
**To:** Planning Board and Zoning  
**Cc:** drn@delawareriverkeeper.org  
**Subject:** STOP CAMP FIMFO!!

The plan to transform most of the existing low-impact tent campsites to RV sites, cabins with water, sewage and/or electric hook ups; adding a swimming pool, mini golf, more parking, more septic systems, more and more artificial light will have significant ramifications for the Wild & Scenic Upper Delaware and the surrounding community. This is a terrible idea. The scenic Upper Delaware belongs to all of us. This plan is ridiculous! It must be stopped!

It is not right to destroy this natural habitat for wildlife! There are water parks and mini-golf elsewhere. I strongly object to this horrible idea.

Best,

Amy Yoes

108 Main Street

Narrowsburg NY 12764

## Code

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**From:** Planning Board and Zoning  
**Sent:** Monday, November 20, 2023 9:42 AM  
**To:** Code  
**Subject:** Fwd: STOP CAMP FIMFO!!

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**From:** Amy Yoes <ayoes@saic.edu>  
**Sent:** Saturday, November 18, 2023 11:57:30 AM  
**To:** Planning Board and Zoning <planningboardzba@townofhighlandny.com>  
**Cc:** drn@delawareriverkeeper.org <drn@delawareriverkeeper.org>  
**Subject:** STOP CAMP FIMFO!!

The plan to transform most of the existing low-impact tent campsites to RV sites, cabins with water, sewage and/or electric hook ups; adding a swimming pool, mini golf, more parking, more septic systems, more and more artificial light will have significant ramifications for the Wild & Scenic Upper Delaware and the surrounding community. This is a terrible idea. The scenic Upper Delaware belongs to all of us. This plan is ridiculous! It must be stopped!

It is not right to destroy this natural habitat for wildlife! There are water parks and mini-golf elsewhere. I strongly object to this horrible idea.

Best,

Amy Yoes

108 Main Street

Narrowsburg NY 12764

## Planning Board and Zoning

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**From:** Nina Burleigh <ndburl@gmail.com>  
**Sent:** Saturday, November 18, 2023 6:31 PM  
**To:** Planning Board and Zoning  
**Subject:** Fimfo - comment

Hello

As a longtime home owner upriver, I've seen many changes in the community. More jobs and money have come, housing prices up. Fancier restaurants. But one thing remained the same: the health and quality of the river and its neighboring forests.

A gigantic RV park is a bad idea. It is very troubling to see that the town lawyer writes a document falsely claiming the site was already a rv camp. We will hold him and Mr. Ellsworth accountable. We are all for improving Sullivan economic conditions but until you can show how increased traffic, pollution from sewage won't affect the quality of life ... why? Please put the community above this quick and apparently dirty way to get more \$\$\$. There are other ways to improve the economy.

Thank you!

Nina burleigh

## Code

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**From:** Planning Board and Zoning  
**Sent:** Monday, November 20, 2023 9:40 AM  
**To:** Code  
**Subject:** Fwd: Fimfo - comment

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**From:** Nina Burleigh <ndburl@gmail.com>  
**Sent:** Saturday, November 18, 2023 6:30:52 PM  
**To:** Planning Board and Zoning <planningboardzba@townofhighlandny.com>  
**Subject:** Fimfo - comment

Hello

As a longtime home owner upriver, I've seen many changes in the community. More jobs and money have come, housing prices up. Fancier restaurants. But one thing remained the same: the health and quality of the river and its neighboring forests.

A gigantic RV park is a bad idea. It is very troubling to see that the town lawyer writes a document falsely claiming the site was already a rv camp. We will hold him and Mr. Ellsworth accountable. We are all for improving Sullivan economic conditions but until you can show how increased traffic, pollution from sewage won't affect the quality of life ... why? Please put the community above this quick and apparently dirty way to get more \$\$\$. There are other ways to improve the economy.

Thank you!

Nina burleigh

## Planning Board and Zoning

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**From:** Leslie Hess <lsrnsj@yahoo.com>  
**Sent:** Tuesday, November 7, 2023 7:58 PM  
**To:** Planning Board and Zoning  
**Subject:** Comment Extension

Dear Ms. Monica McGil, Planning Board Secretary,

- I appreciate the Town of Highland's step in the right direction in requiring a full Environmental Impact Statement for Camp FIMFO;
- A 20 day comment period, that spans the busy election season as well as travel days associated with the Thanksgiving holiday, is not adequate for my ability to fully and fairly review and comment on the draft scoping document;
- The true impacts of the proposed Camp FIMFO, while clearly significant, have been largely inaccessible to the public to date and it will take time to fully consider and identify all the issues that need to be addressed;
- It is clear that this resort type project would have devastating impacts to my community and the forestwoods, streams, public spaces, and much of the Delaware River watershed I cherish;
- The 223 acre resort style proposed changes and impacts are not in keeping with the scenic forested Upper Delaware Wild & Scenic River qualities that the Delaware River and its riparian corridor are known for and for which visitors come to enjoy each year; and
- The scoping comment period must be extended to at least December 21, 2023 in order for myself, my friends, family, and community to fully grasp and respond to this proposal.

Sincerely,  
Leslie Hess

## Planning Board and Zoning

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**From:** Erik Freeland <erikdfree@gmail.com>  
**Sent:** Tuesday, November 7, 2023 10:32 AM  
**To:** Planning Board and Zoning  
**Subject:** NO to FIMFO

Good day,

I would like to register my opposition to the FIMFO project. This is such a terrible idea. It will change the area dramatically and does not at all a good fit for the Upper Delaware Valley.

Please just reject this project as another threat to this beautiful and scenic area in which we live.

Thank you!

Sincerely,  
Erik

Erik Freeland  
Cochecton, NY

## Planning Board and Zoning

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**From:** Mary Jones-Mellett <mjonesmellett@gmail.com>  
**Sent:** Monday, November 6, 2023 1:28 PM  
**To:** Planning Board and Zoning  
**Subject:** Camp FIMFO

Hello Town of Highland Planning Board,

As a local resident of Sullivan County and a property owner of several residential parcels in and around the Upper Delaware River, I am urging you to please consider extending the Review & Public comment period in regards to the Camp FIMFO project and the Full Environmental Impact Study to the 12/21/2023 Town of Highland Planning Board Meeting.

Thank you in advance.

Mary Jones-Mellett

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Mary Jones-Mellett  
917-593-0307



## Planning Board and Zoning

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**From:** Marie Carota <1madsy1@gmail.com>  
**Sent:** Monday, November 6, 2023 11:27 AM  
**To:** Planning Board and Zoning  
**Subject:** Camp Fimfo

I would like to make some comments on the proposed Camp FIMFO on the upper Delaware River. I read the proposal of changing tent sites into RV sites, building amusements, rebuilding much of the existing camp and adding the water treatment systems.

I realize there is an existing (grandfathered) camp there in what is now a sensitive area and this is a proposed expansion.

I am very concerned for several reasons:

- The expansion will further impact the river/floodplain. Recent storms indicate there will be heavy flooding more often along all creeks and rivers.
- It will be too commercial and built up a place in a very beautiful area that people come to in order to enjoy the outdoors.
- It will requires not only improved septic systems but increased systems. I feel with flooding and being so close to the river these may not be easy to keep from polluting the waters.
- Tent sites are much more passive and converting so many to RV sites will be too impactful
- If this is built up as proposed it will set a precedent for other commercial places along the river where we should be protecting not developing

Marie Carota  
Doylestown PA

## Planning Board and Zoning

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**From:** Sondra Wolferman <jperrin21@hotmail.com>  
**Sent:** Monday, November 6, 2023 11:15 AM  
**To:** Planning Board and Zoning  
**Subject:** RE: Town of Highland's Draft Scoping Document for the Camp Fimfo Modernization and Improvement Project.

Town of Highland  
Ms. Monica McGil, Planning Board Secretary  
[planningboardzba@townofhighlandny.com](mailto:planningboardzba@townofhighlandny.com)  
4 Proctor Rd  
Eldred, NY 12732

Dear Planning Commission:

I am writing in response to the Planning Board's request for comments regarding the Town of Highland's draft scoping document for the Camp Fimfo Modernization and Improvement Project.

According to the document, the existing campground has been in operation for nearly a century, during which the property was maintained mostly in a natural state and primarily used for tent camping, along with a few existing amenities such as bathhouses, laundry facilities, and RV camping sites.

The developer's plan shows a drastically different vision for the future of this site. In addition to the potential water quality impacts resulting from wastewater collection and treatment, which typically involves chemical treatment using detergents, disinfectants, deodorants, neutralizers, coagulants, and other substances potentially hazardous to plants, animals, and aquatic life, upgrades are proposed to electrical infrastructure, landscaping and fencing.

Among the joys of traditional camping, at least in my experience, are the dark skies at night that enhance the wilderness experience and provide a respite from the light pollution in residential and commercial areas. The applicant's proposed upgrades to electrical infrastructure suggest that more and brighter lighting will be installed at the site, both indoors and outdoors, further degrading this experience. Furthermore, the light pollution resulting from improved electrical infrastructure is detrimental to many species of wildlife and is among the major reasons for the loss of biodiversity worldwide.

The developer's proposed upgrades to landscaping are equally disturbing in that modern landscaping often includes the use of chemical pesticides, herbicides, and fertilizers known to pollute waterways, causing algae blooms and fish kills, with disastrous consequences for the ecosystem. The developer's landscaping plans may include the removal of native trees, shrubs, and grasses for the installation of manicured lawns and acres of pavement and impermeable land surface. Blasting of rock formations is also mentioned in the scoping document. The Wild and Scenic Upper Delaware Region is among the most beautiful natural landscapes in the eastern United States. It does not need improvement.

According to the National Park Service: *As part of the Wild and Scenic Rivers System, the Upper Delaware River is managed to maintain the scenic integrity and biological diversity that makes this area so unique.*" The Upper Delaware watershed hosts the largest population of wintering bald eagles in the northeastern United States. Clean water, ample food in the form of healthy fish populations, and stands of tall trees along the river make this region an ideal habitat for the bald eagle. A decline in water quality means fewer fish, which means fewer eagles and other species that depend on healthy fish populations for survival. The Camp Fimfo Modernization and Improvement Project is a threat to both the scenic integrity and the biological diversity of the site.

I have examined the scoping document, and it is my opinion that the proposed project goes far beyond a "modernization and improvement" project and more closely resembles a full-scale Redevelopment plan that could forever change the character, the scenic integrity, and the ecology surrounding this 235-acre site in the hamlet of

Barryville, New York. The developer has referred to the project as an “economic engine” for the region. This alone provides an insight into what this project really has in store for the region.  
Thank you for the opportunity to Comment.

Sondra Wolferman

112 Buckhill Road

Albrightsville, PA 18210

jperrin21@hotmail.com

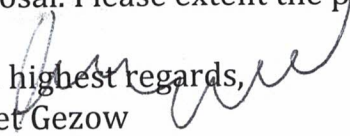
October 31, 2023

Dear Highland Planning Board members.

I first want to congratulate and thank the board for demanding due process by requesting the acquisition of an EIS from Northgate for their Camp FIMFO project. It really brought back my faith that the town board is looking out for the good of the community above the profit of a few. Thank you!

However, the allotment of such a short time for comment period, especially during this busy season (elections, holiday preparations) defeats the purpose of the actual process and does not provide the public sufficient time to review and comment. As you are aware, the full scope of the project has not been transparent or available to the public. We need to ensure that the Northgate corporation are fully transparent and that they follow protocol. We want to make sure that they act as good neighbors and that we can feel safe and know that they did everything they could to ensure our fellow members and our environment are minimally impacted and that we as the community, along with the town of highland, can hold them responsible going forward. Whether we "like" them or not is immaterial. FIMFO has the same rights as anyone else to establish their business in our amazing community, so long as they follow protocol and the law and assure us of their commitment to our community. To that end we need a sufficient period of time to review and respond to their proposal. Please extent the process to allow due process.

With highest regards,  
Ayelet Gezow  
Pond Eddy, NY



October 31, 2023

Ms. Monica McGil, Planning Board Secretary  
4 Proctor Rd  
Eldred, NY 12732

Dear Town of Highland Planning Board,

I write to you from just up-river to thank you for requiring a full Environmental Impact Statement for a possible Camp FIMFO along our beautiful river.

I am very concerned, however, that the 20-day comment period is not long enough for any of us concerned stakeholders to have time to adequately study and comment on the document, especially during the holidays.

The 223-acre planned development would pave over 14 acres of forest at a time when we are all coming to understand the vital importance of the forests to help combat climate change but also to keep the local ecosystems in tact—to keep the water filtered and clean, to support the insects that feed the fish and the birds that bring tourists to our area, to help protect the character of the place we all love so much.

This is not a place for an amusement park with 14 acres of new pavement, lawn and swimming pools—the National Park Service has determined that this proposal is not in keeping with the land and water use guidelines for the Upper Delaware Wild & Scenic River management plan. The permanent structures for guests in the flood plane, the destruction of riparian forest, the increased acreage of impervious surface, and the threats to water quality created by all three are not in keeping with the management plan for the river.

There is nothing wild and scenic about this giant amusement park—the largest development ever in the Upper Delaware, according to a UDC member. Something so unusually large and destructive requires ample time for the community to understand what is proposed and to comment. I ask you to please extend this deadline and give those of us who will be so heavily impacted by this proposed project time to review the Environmental Statement and respond. Please!

Thank you for the opportunity to have a voice in this matter.

Sincerely,



Louise Washer  
River Road  
Milanville, PA

## Planning Board and Zoning

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**From:** Tesla Deboer <tesla.staple.maple.rabie@gmail.com>  
**Sent:** Sunday, November 5, 2023 7:41 PM  
**To:** Planning Board and Zoning  
**Subject:** camp fimfo

Opening up a water park on the upper delaware is darn near an atrocity. Living on the delaware I see daily how tourists abuse and disrespect nature, not to mention the environmental impact that is still unclear.

Anyway who cares about the future of our beautiful river should be opposed to further exploiting it for momentary monetary gain.

Truly, Tesla DeBoer

## Planning Board and Zoning

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**From:** Lynnette Saunders <odonata96@gmail.com>  
**Sent:** Sunday, November 5, 2023 3:17 PM  
**To:** Planning Board and Zoning  
**Subject:** camp FIMFO

Dear Ms McGil,

As a former resident of New York state, and a person who enjoys many of the beautiful natural areas with my family, I would be sickened to see a project as destructive as the proposed Camp FIMFO occur.

As an ecologist, I know how the loss of habitat, resulting increase in sewage, trash, traffic, noise, and light would have devastating impacts on many species. The watershed would also be negatively impacted due to increased stormwater runoff, increased sediment loads in waterways, and increased water temperatures. The nutrient balance of waterways would also be disturbed.

Ideally, this project would be denied immediately due to its incongruous nature with the surrounding area. The National Park Service agrees that this project does not conform to the Land and Water Use Guidelines of the Upper Delaware Wild and Scenic River Management Plan.

Please make sure that the assessment for impacts from this project would be thorough and complete. It must include all the potential impacts to air, soil, water, habitats, and climate.

Sincerely,

Lynnette Saunders, Ph.D.

## Planning Board and Zoning

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**From:** Ryan Dodson <ryandodson17601@gmail.com>  
**Sent:** Saturday, November 4, 2023 11:44 PM  
**To:** Planning Board and Zoning  
**Subject:** Camp FIMFO

To whom it may concern:

The National Park Service has determined that the project fails to conform with the Land and Water Use Guidelines of the Upper Delaware Wild & Scenic River Management Plan essential for protecting our Scenic and Recreational River. I sincerely hope a full environmental impact statement is performed. Thank you!

--

Ryan Dodson  
PA Contractor License 154755  
717.475.0195



## Planning Board and Zoning

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**From:** Harry Shifman <hshifman@gmail.com>  
**Sent:** Saturday, November 4, 2023 12:28 PM  
**To:** Planning Board and Zoning  
**Subject:** No FIMFO

We do NOT want this development in our area for the simple reason it is destructive to nature, water, waste produced, increased population flow, etc.

NO NO NO

Harry Shifman  
Glen Spey NY

Karen Matsu Greenberg  
COUNTY ROAD BAKERY  
922 County Road 94  
Fremont Center, New York, 12736

20 November 2023

To the kind attention of the Planning Board of Highland Township:

Norman Sutherland  
Steve Bott  
Tim McKenna  
Jeffrey Spitz  
JT Vogt

Town Hall  
4 Proctor Road  
Eldred, NY 12732

Subject: **CAMP FIMFO CATSKILLS**

Dear Planning Board Members,  
Greetings to all! I appreciate your diligently long-term work on this matter! and am sorry this note comes so close to the closing of public comment, please forgive that.

As a 25 year full-time Catskills resident and a longtime visitor (with my family's family) before that, I have an affinity for all of the beauty, and local commerce, that makes the river corridor UNIQUE.

We are business owners, part of the Barryville and Callicoon Farmers Market communities; we have strong, personal relationships with long-term, full-time residents in Highland and the surrounding towns as well as the many seasonal vacationers who annually partake in the riches our rural, river community. Previously, as director of manufacturing at America's largest bookstore chain, I gained first-hand experience in large-scale, business operations, both successful and not (successful).

From my view, the proposal for Camp Fimfo is "not a good fit"; ex: the concept of permanent RV lots that are utilized only one quarter of the year is not in sync with environmental regional needs and visionary plans for the corridor. Portions of the SEQRA Process Summary disingenuous. To suggest that there will be *minimal impact* in all manners (the loss of habitat for local species with the removal of approx.. 15 acres of trees, the impact of projected light into the night sky, so many aspects of water use, road use, to name but a few), well,.... it's just not true that impact is minimal.  
I ask that each of these areas be addressed very carefully as once altered, they cannot be undone.

Further, there is NOTHING included to suggest any increase in training for river safety or swimming instruction, or *any alignment* with the American Red Cross for swimming safety certification. There are no canoeing instruction plans... .. no educational benefit and seemingly to have NOTHING TO DO WITH THE RIVER. My own summer camp on the river insisted on this training. Lacking from this proposal, it's Shameful!

At the very least, I am suggesting the addition of a comfortable, wooden-bridge walkway that spans Rt. 97, especially with the suggested development on the north side. Include an approach to the walkway from the new office area with a ramp, so that folks with special needs and/or strollers can utilize the campground, and conform with the Americans with Disabilities Act. If Northgate Resorts and Sun Communities are truly committed to making this project a better outcome for the town, make them make it useful for *everyone*.

You have my kindest thanks for your attention, I appreciate you reading this letter and offer you all wishes for a loving and supportive weekend of Thanksgiving.

Sincerely,  
Karen Matsu Greenberg  
Via email

## Planning Board and Zoning

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**From:** Cloey Callahan <callahancloey@gmail.com>  
**Sent:** Tuesday, November 21, 2023 3:19 PM  
**To:** Planning Board and Zoning  
**Subject:** Press Inquiry - Camp FIMFO

Hi,

My name is Cloey Callahan and I am writing an article for the nonprofit news magazine The Delaware Currents about the latest on Camp FIMFO.

I understand public comments are due tomorrow. I'd love to interview someone from the planning board for the article to understand better what is at stake and what the process is moving forward. Can someone hop on a call the week of Nov 27? Or maybe the town supervisor is better to interview?

Let me know what you think. Thanks!

Cloey Callahan  
Delaware Currents  
845-216-4736

## Planning Board and Zoning

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**From:** George Billard <george@planetbillard.com>  
**Sent:** Wednesday, November 22, 2023 9:41 PM  
**To:** Planning Board and Zoning  
**Subject:** stand up for the residents of Highland and the health of the river

To the Planning Board,

You might be irritated by the citizens of Highland who demand that you extend the comment period, make FIMFO undergo a full environmental study, and be more transparent about their plans. I write to remind you that you are our representatives, not facilitators to out of state corporations who have no stake in the community other than the financial exploitation of our resources.

Stand up for us. Extend the public comment period and demand a comprehensive environmental study. If FIMFO is fully transparent and honest and the study shows the development to be of no consequential impact, so be it. If you don't, you will have done this community a great disservice and leave the town open to litigation.

Sincerely,

George Billard  
Eldred

## Code

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**From:** Planning Board and Zoning  
**Sent:** Monday, November 20, 2023 10:11 PM  
**To:** Code  
**Subject:** FW: Public Comment Submission  
**Attachments:** For Public Comment Scoping Draft EIS - .pdf

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**From:** Christine Martin <christinemrtn8@gmail.com>  
**Sent:** Monday, November 20, 2023 9:24 PM  
**To:** Planning Board and Zoning <planningboardzba@townofhighlandny.com>  
**Subject:** Public Comment Submission

Dear Town of Highland Planning Board Secretary Ms McGill,

Please find attached and below some public comments for the Camp FIMFO scoping document - regarding the draft environmental impact statement.

Kindly confirm receipt of this email.

Thank you.

Respectfully yours,  
Christine Martin  
Resident, Town of Highland  
Barryville NY, 12719

**Public Comment on Scoping Document RE: Camp FIMFO Resort  
— For Draft Environmental Impact Statement (DEIS) —**

**November 20, 2023**

The below is respectfully submitted for the public record.

**I) Concerns about controlling density**

According to the draft scoping document there will be “283 Campsites converted to RV sites”.

- What is the actual acreage on which these 283 RVs will be placed?
- How many of these RV buildings will be crowded onto each of the “prime few acres” of the property? This is not a question about the average based on a total number of acres on the property. A total average is misleading for the actual density of the buildings.
- Will the accurate density be reported to the public and the planning board?
- Can residential or commercial density rules be changed to protect this area from overcrowding? The Town of Gardiner NY changed their density regulations in response to a Northgate owned resort which was going to build too many RV buildings in one small area.

Please read this article linked below and include in public record and the DEIS findings:

## **Safety concerns prompt Gardiner to restrict density of Lazy River**

by Frances Marion Platt August 31, 2022 - <https://hudsonvalleyone.com/2022/08/31/safety-concerns-prompt-gardiner-to-restrict-density-of-lazy-river/>

### **II) Questions about excessive water usage**

The 283 RV sites will be equipped with 283 new toilets, 283 showers, and plumbing systems. The FIMFO plans indicate two new 6200 sq ft swimming pools, other aquatic play areas and a new resort sized laundry facility. FIMFOs stated water usage (around 40,000 gallons per day) seems wildly underestimated given these proposed developments.

The applicant should breakdown estimated water usage with more detail for all affected areas including:

1. Water usage for the 283 new toilets and private showers, all other restrooms and shower areas.
2. Water usage for the Resort Laundry Service. The national estimate for hotel/commercial laundry is 1400 gallons of water per load. How many loads will be needed per day with Camp FIMFO to service 283 RVs. How much water does the laundry facility need?
3. Accurate water usage for all aquatic areas – two large resort sized pools, two 35 ft high water slides and kiddie water play area. Please breakdown how many gallons per day for each area? How often will recreational water (pools and play areas) need to be refilled?
4. Accurate water usage for irrigation for lawn areas and other new landscaping. How many gallons per day?
5. What about times of drought, how will additional water be made available, is there a drought plan?

### **III) Questions about designated flood zone area and climate change:**

Both major and moderate floods can cause great damage and must be considered a certainty. Is the applicant taking in to account the 500 year storm events given the dramatic changes in climate. Here is a list of some of the recent Barryville Area floods.

<https://www.weather.gov/media/marfc/FloodClimo/DEL/Barryville.pdf>

## Historical Floods: Delaware River near Barryville, NY

Latitude: 41.509

Period of Record: 1940-Present

Flood Stage: 17

Last Flood: 9/8/2011

Date of Flood	Crest (ft)	Streamflow (cfs)	Category	Code	Date of Flood
5/23/1942	23.19	105,000	Moderate	none	
12/31/1942	17.89	69,800	Minor	none	
3/22/1948	20.07	84,000	Minor	none	
12/31/1948	17.63	68,100	Minor	none	
3/31/1951	17.65	68,200	Minor	none	
12/12/1952	17.7	68,600	Minor	none	
8/19/1955	26.4	130,000	Major	F2	
1/22/1959	17.73	68,700	Minor	F2	
2/24/1961	18.19	-9,999	Minor	C7 F2	
6/29/1973	20.06	83,900	Minor	F2	
2/11/1981	20.9	-9,999	Minor	C7 F2 F3	
3/15/1986	19.28	78,700	Minor	F2	
1/20/1996	22.18	98,300	Moderate	F2	
9/18/2004	24.09	112,000	Moderate	F2	
4/3/2005	24.8	118,000	Moderate	F2	
6/28/2006	28.97	151,000	Major	F2	
10/1/2010	17.18	64,300	Minor	F2	
9/7/2011	17.05	63,500	Minor	F2	
9/8/2011	18.61	73,600	Minor	F2	

#### IV) Will there be a new season extension?

The new luxury RVs will be equipped with insulation, heating and cooking (microwave) and plumbing which would provide for a longer season into spring and fall. Will this increase annual population, increase water usage, increase electrical usage, increase parking and traffic estimates?

#### V) Question about population/capacity.

Camp FIMFO Resort estimates occupancy at 2,354 people. More detail is needed here. What is the annual number of guests expected on the property? How does this compare to the actual numbers of previous years? What is the annual number of day visitors? There was an annual estimate of 20,000 people in 2023. Is this accurate?

#### **What is the annual number of people expected on the river?**

There was an estimate of 40,000 people in 2023 on the river put forth by FIMFO. What measures are in place to limit when maximum capacity is reached? How is this managed?

#### **What is the environmental impact due to increased activity on the river?**

What are the signs that the river is being abused or damaged? What monitoring will be in place to review damage to river (river erosion, sediment etc)? What measures are being taken to reduce river erosion and clean up river trash in the river?

#### **VI) Parking**

The FIMFO resort will create “286 new parking spaces” plus utilize “120 parking spaces on grass” (on the south river side). Are there additional cement or gravel parking pads beside each of the RV sites? Are south side parking spaces in the flood zone? More detail is needed about parking. How are 400 spaces enough for an estimated 20,000 annual guests? How are 400 spaces enough for an estimated 40,000 annual river use guests? Where do staff park? What about overflow cars?

Please provide visual representations of the 400 cars (potentially more) in all official representations, drawings and plans, for the public’s understanding of the visual impact of these parking lots on the natural landscape.

#### **VII) Traffic**

A traffic study is needed to protect pedestrians and vehicle passengers. A high-season traffic study seems absolutely necessary for the safety of residents and visitors to the area.

Please read this news article and include it in the scoping documentation. The article is about a similar Northgate owned property in Milton, NH, that was opposed by the local community due to traffic concerns: “*expansion would create an “undue nuisance or serious hazard to pedestrian or vehicular traffic.”*”

Northgate Loses Appeal In Milton Campground Expansion, Ossipeelake.org June 10, 2020, by David Smith,

<https://www.ossipeelake.org/2020/06/northgate-loses-appeal-in-milton-campground-expansion/>

#### **VIII) Tree Clearing and excavation**

FIMFO Estimates 17 acres of mature tree clearing for sports courts, landscaping, and aquatic areas. How will they accommodate the destruction of habitats. Will they provide alternate habitats for birds, bats, bees, butterflies displaced by the destruction of forest?

Please provide reports and ensure future monitoring about increased flood risks and “sinking” buildings or lands due to 17 acres of tree removal? How will this be monitored and reported to the public?

#### **Excavation risks**

Who will monitor construction processes for responsible excavation – how much earth/rock is being removed, where is it to be re-located? What are the effects of this excavation.

#### **IX) Barnes Toxic Waste Site – adjacent to property**

- What is the actual proximity of the toxic waste site to blasting sites?
- Please provide engineer drawings of the location.



- What is the proximity of toxic waste to the water table?
- Who will monitor for possible contamination during construction? Who will monitor and report to the public for possible contamination during heavy rainfall throughout the year?
- What about during a flood?
- Will there be any contribution by Northgate towards monitoring and or long-term remediation of the Barnes toxic waste.

Please watch this YouTube video and include the transcript in the scoping document.

Video shows Lechate at the Barnes Toxic Waste Site:

YOUTUBE LINK HERE: <https://www.youtube.com/watch?v=3CT7k32tpQE>

“This is a video of the leachate flowing out of the holding tanks at the base of the Barnes landfill located in Barryville NY. The NYS DEC listed this landfill as a superfund site a decade ago and then turned their backs on the proper collection and treatment of the tens of thousands of gallons of leachate that is generated during each and every rain event. The leachate then flows into a stream which enters the Delaware river approximately 500 yards from the base of the landfill. The Delaware river is the main source of drinking water for millions of people in Pennsylvania, New Jersey, Maryland and Delaware.”

#### **X) Ethical Employer Standards**

The Campground currently employs 46 employees. Apparently “CAMP FIMFO will add 89 new (FTE) jobs” (full time jobs)

- What if this number of new FTEs is not met?
- Who will monitor employment numbers?
- What is the rate of pay for all employees?
- Hourly rate?
- Is this a living wage for all staff?
- What is the housing opportunity for these employees?
- What benefits are being offered to staff?

##### **a. IDA PILOT PROGRAM and other Development Grants**

- What are the qualifications and disqualifications for the PILOT program? If Camp FIFMO does not invest the full estimated \$44million, are they still eligible for the PILOT program? If for any reason there is no aquatic area, are they still eligible? If the RV quantity or population is reduced, are they still eligible for the program. Who will determine if FIMFO still qualifies if they do not make all the stated “improvements” but merely continue the river livery activities and renovate a couple of buildings?
- Is FIMFO still eligible for the Mid-Hudson Regional Economic Development Council grant totalling \$1.5 million which was awarded at the time of the land purchase, if the improvements and plans are not completed as originally projected.

#### **XI) Environmental Monitoring and Spot Checks**

- Who will be responsible to check for river contamination? Who will be responsible for river clean up – how often?
- Who will be responsible for monitoring water usage – how often and will these reports be made public?

- Who will monitor animal habitat and vegetation health?
- Will these reports be available to the public?

**XII) Nuisance and Noise**

- Noise complaints have been made at other Northgate properties in Gardiner NY. Will the corporation respond to noise or other nuisance complaints.
- What is the remedy if there are noise complaints at Camp FIMFO?
- What about noise complaints before 10pm?

**XIII) Exterior Lighting**

- Will Dark Sky Regulations be followed?
- Will there be additional respect for seasonal bird migration periods?
- How will lighting be monitored so that there is continued compliance with these concerns?

**XIV) Public Policy Compliance**

NPS found Camp FIMFO to be in noncompliance with the River Management Plan, and Land and Water Use Guidelines. How will FIMFO remedy these NPS compliance concerns? Is the applicant allowed to just ignore the Federal Government?

**XV) Town of Highland Comprehensive Plan,**

How will Camp FIMFO comply with goals of rural peace and tranquility, eco-tourism, green technology, solar energy, and green infrastructure that are stated in the comprehensive plan?

Please ensure that the plans for Camp FIMFO comply with these goals of the Town of Highland's Comprehensive Plan. Stated goals from the foreword to the 2012 Comprehensive Plan:

1. To preserve and extend the enjoyment of peace and tranquility to residents and provide an improved quality of life for the Town.
2. To preserve the high quality and quantity of our fresh water sources, including surface and groundwater supply, drinking water, and the Delaware River and its tributaries, as resources vital to our health, safety, economy, and recreation.
3. To conserve the quality and quantity of land, air, water, forest, wildlife, mineral, historic and scenic resources for the use and enjoyment of both residents and visitors.
4. To encourage the development of housing, business, and community facilities that are energy efficient and utilize sustainable materials and technologies.
5. To ensure that every dwelling and place of work is supported by an adequate and untainted water supply, sewage treatment and disposal system or septic system, solid waste disposal, electricity, telephone, broadband and mobile telephony.
6. To promote the safe, quiet, efficient and sustainable circulation of people and goods throughout the Town and to sustain a strong road infrastructure.
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.
8. To maintain a balanced and equitable tax base.

9. To protect residents and their property from the harm of flood, fire, detrimental land use, air and water pollution, noise and light pollution, water degradation and depletion, and other impairments of their natural resources and property values.
10. To encourage the development of environmentally responsible economic opportunities that uphold the values expressed in this plan.

**XVI) Community Character/Visual Impact**

- Will the FIMFO buildings and recreational facilities (pools/slides etc) be visible from the road or river? During summer or winter? What will they look like?
- Will the parking lots be visible from the road or the river in summer or winter?
- Please include in all representations/plans, a depiction including the almost 400 cars against the natural backdrop of the treasured scenic area.
- Will FIMFO provide visual drawings of all new landscaping to ensure use of mature trees and extensive mature coverage?
- Will FIMFO commit to no new green grass lawns that require too much water and reduce insect habitat?

**XVII) Safety Concerns Drugs, Alcohol and Firearms**

- Will the FIMFO staff receive overdose training?
- Will any firearm carry-regulations will be in place on the property? Are guests allowed to carry guns?
- Would FIMFO be willing to have a “dry campus” with no alcohol on site to increase safety of guests, pedestrians, swimmers on the river, and reduce traffic accidents?

**XVIII) Vegetation and Wildlife**

- What is the plan for managing all wild life including *non-threatened/regulated species*, such as, deer, bear, rabbits, foxes, bears, possum, eagles, fish, etc.
- What will be the policy for managing animal control on the property? Will FIMFO agree to use humane means if trapping animals (not uses poison). Poison kills off other animals in the food chain.
- What is plan for protecting vegetation including increasing native species, protecting American Walnut, White Pine, and Mountain Laurel etc?
- Will FIMFO agree to not use harmful pesticides and Round-Up on “weeds.” **Glyphosate is a known toxic carcinogen causing cancer in animals and likely in humans.**

**XIX) Proposed Mitigation**

**The following would be needed to mitigate the negative environmental impact of the project:**

- Reduce density of buildings/dwellings/
- Reduce the number of RVs overall.
- Reduce septic output quantity.
- Reduce cars, and parking lots .
- Reduce impervious surfaces for flood risks.
- Reduce # of guests and control over use of river activities.
- Reduce tree clearance and excavation plans.
- Reduce daily water usage.
- Reduce laundry facility use.

- Monitor neighbor wells.
- Monitor Barnes toxic waste site adjacent to property.
- Monitor sewage for overflow and contamination of land or water.
- Monitor and report river contamination levels.
- Monitor and report water usage levels.
- Report water usage plans for periods of drought.
- Monitor and report river erosion and sediment.
- Monitor and report wildlife impacts including changes to habitat and migration.
- Use humane and sustainable methods for animal control.
- Reduce of toxic pesticides.

**XX) Stress on Town Services**

The remedy for this inevitable need is to pay taxes to the town. Is the applicant willing to provide financial contribution to Town services?

**XXI) Northgate Reputation**

Northgate's reputation with similar campground resorts should be part of the public record. Several small towns have fought and won against similar proposed Northgate projects for the same reasons and concerns stated by the citizens of Highland NY. Please include the following news reports and articles in record.

**TV News Reports and News Articles demonstrating similar concerns with Northgate projects:**

- 1. Problems with Northgate Property in Gardiner NY - <https://bronx.news12.com/yogi-bear-s-jellystone-park-called-corporate-bullies-by-neighbors>**
- 2. The winter of their discontent: Many proposed RV parks facing stiff public opposition. By Andy Zipser, January 15, 2022 - <https://www.rvtravel.com/andy-zipser-winter-of-their-discontent-1035b/>**
- 3. Hinsdale officials reject RV park plan, calling it too much for a small town by Larry Parnass, The Berkshire Eagle, Jan 11, 2022 - [https://www.berkshireeagle.com/news/central\\_berkshires/hinsdale-rejects-northgate-rv-park-proposal/article\\_82913ed8-7346-11ec-8796-b39208316131.html#:~:text=HINSDALE%20—0In%20the%20end%2C%20a.by%20Northgate%20Resort%20Ventures%20LLC.](https://www.berkshireeagle.com/news/central_berkshires/hinsdale-rejects-northgate-rv-park-proposal/article_82913ed8-7346-11ec-8796-b39208316131.html#:~:text=HINSDALE%20—0In%20the%20end%2C%20a.by%20Northgate%20Resort%20Ventures%20LLC.)**
- 4. Safety concerns prompt Gardiner to restrict density of Lazy River. by Frances Marion Platt August 31, 2022 - <https://hudsonvalleyone.com/2022/08/31/safety-concerns-prompt-gardiner-to-restrict-density-of-lazy-river/>**
- 5. NORTHGATE LOSES APPEAL IN MILTON CAMPGROUND EXPANSION, June 10, 2020 David Smith - <https://www.ossipeelake.org/2020/06/northgate-loses-appeal-in-milton-campground-expansion/>**
- 6. Too Much for a Small Town – Jan 12, 2022, Modern Campground <https://moderncampground.com/usa/massachusetts/too-much-for-a-small-town-hinsdale-officials-reject-rv-park-proposal/>**

## Planning Board and Zoning

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**From:** Jane Panico <nystylist@bluetiehome.com>  
**Sent:** Wednesday, November 8, 2023 9:49 AM  
**To:** Planning Board and Zoning  
**Subject:** Camp Fimfo

- \*I appreciate the Town of Highland's step in the right direction in requiring a full Environmental Impact Statement for Camp FIMFO;  
A 20 day comment period, that spans the busy election season as well as travel days associated with the Thanksgiving holiday, is not adequate for my ability to fully and fairly review and comment on the draft scoping document;
- \* The true impacts of the proposed Camp FIMFO, while clearly significant, have been largely inaccessible to the public to date and it will take time to fully consider and identify all the issues that need to be addressed;
- \*It is clear that this resort type project would have devastating impacts to my community and the forest, streams, public spaces, and much of the Delaware River watershed I cherish;
- \*The 223 acre resort-style project proposes changes and impacts that are not in keeping with the scenic forested Upper Delaware Wild & Scenic River qualities that the Delaware River and its riparian corridor are known for and for which visitors come to enjoy each year; and
- \*The scoping comment period must be extended to at least December 21, 2023 in order for myself, my friends, family, and community to fully grasp and respond to this proposal.

Thank you  
Jane P

## Planning Board and Zoning

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**From:** Mike Edison <rockettrain@hotmail.com>  
**Sent:** Monday, November 20, 2023 4:09 PM  
**To:** Planning Board and Zoning  
**Subject:** FIMFO SCOPING DRAFT DEADLINE

Ms. Monica McGil,  
Planning Board Secretary  
Town of Highland

November 20, 2023

Dear Ms. McGil,

I am joining my community, and as a matter of public record, respectfully requesting an extension of the commenting period on the Draft Scoping Statement regarding the project known as CAMP FIMFO, aka Northgate Resorts.

A twenty-day comment period that spanned the busy election season and runs into Thanksgiving was not in the best interests of the town or a fully informed scoping session, and has not been enough time to fully and fairly review and comment.

The true impacts of the proposed Camp FIMFO, while clearly significant, have been largely inaccessible to the public to date, and it will take time to fully consider and identify all the issues that need to be addressed.

It is clear that this resort type project would have devastating impacts to our community, and much of the Delaware River.

Also, while the Town of Highland is the lead agency, and this project is in the heart of our town along the River Corridor, this project will affect communities up and down the river, some who depend on the Delaware River for drinking water, and they should also be engaged to prepare a full scoping and an uncompromised Impact Study that adequately protects the river corridor, and reflects the public's best interests and concerns over this project.

Based on the large public outcry, unprecedented presence at town meetings, and heated online engagement — and out of courtesy, professionalism, and loyalty to the People of the Town of Highland — the Board should, out of an abundance of due diligence and good faith, extend the comment period through January 21, 2024.

My further notes and comments specific to the scoping and the impact study will be submitted in a separate email.

Thank you so much for your time and consideration.

Very sincerely,

Mike Edison  
Town of Highland

## Planning Board and Zoning

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**From:** ted weiner <tjweiner@yahoo.com>  
**Sent:** Monday, November 20, 2023 11:34 AM  
**To:** Planning Board and Zoning  
**Subject:** Public comment on fimfo

Dear planning board, I do hope that everybody has a safe, happy glorious holiday season. I would like you to extend the public comment period for the fimfo project till after the holiday season because many people are either away , or planning their holidays and unable to comment . Another month or more would certainly not affect this project but not truly getting everybody's comments would and could be disastrous. I am certain that the planning board wants to hear from everyone . Thusly extending the comment period till ten days following new years would be advisable . Please let's make sure we that you are certain that this project will be environmentally good for the upper River Deleware region and not change the character of this unique ,special area . Thanks for your efforts and please do the right thing and protect our magical area. Sincerely yours, Theodore Weiner DVM

**dalegoodman@verizon.net**

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**From:** dalegoodman@verizon.net  
**Sent:** Tuesday, October 31, 2023 8:21 AM  
**To:** 'planningboardzba@townofhighlandny.com'  
**Subject:** FIMFO

To whom it may concern: I am a resident of the Delaware River Watershed. I have a home in Dingmans Ferry, PA. I have significant environmental concerns regarding the FIMFO proposed development on the Delaware River. While I appreciate the Planning Board's steps in the right direction to require a full Environmental Study, I would like to request that the Planning Board seriously consider delaying the comment period for at least another 30 days. The reasons for this request are as follows:

1. The current period is just too short and during the holiday season.
2. This project seems to have been flying under the radar and as such, needs to be fully and fairly reviewed by the public for its impact on the environment and the Delaware River in particular.
3. There is no doubt of the adverse impact of this project on the River and generally on the communities that surround the project. I have personally witnessed the unmanageable increase in trash and dumping in our area over the last decades due to development and influx of residents from out of our area.
4. This is a significant project in size which will have a devastating effect on the Upper Delaware River corridor which is pretty much a wild and scenic area now.
5. Again, the timing of the comment period must be extended to allow the effected residents, clubs, organizations, etc., to analyze the true impacts of such a proposal.

Thank you for your consideration of my concerns.



Dale Goodman

"dalegoodman@verizon.net"



## Planning Board and Zoning

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**From:** Linda DeBoer <millriftlinda@gmail.com>  
**Sent:** Sunday, November 5, 2023 5:54 PM  
**To:** Planning Board and Zoning  
**Subject:** camp Fimfo

I have lived on the Delaware for 50 plus years and I have seen it's slow decline, largely in part due to the exploitation of tourism.

How sad to sacrifice all that is beautiful and clean for the sake of tourism and a fleeting profit. People have worked so hard to make the upper delaware a gift...and now it may become a theme park.

Please consider who and what wildlife will benefit from this. Why did anyone work so hard to keep this river the way it is and should stay... is money the answer? We can never buy back a pristine ecosystem.

Sincerely,  
Linda DeBoer

## Planning Board and Zoning

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**From:** Margaret Granese <mgranese50@aol.com>  
**Sent:** Saturday, November 4, 2023 2:06 PM  
**To:** Planning Board and Zoning  
**Subject:** Independent Environmental Impact Study

- I do not believe we have a complete information concerning all the data that is needed.
- I've been donating to the NPS for many many years to preserve our animal & plant life. They aren't satisfied with the way the project is going
- I believe this FIMFO project would jeopardize this area that I love & live in, but most certainly will push away our wildlife and remove our plant life that has been here for many years.
- My hope is I believe if the residents could be more involved and address our concerns in a positive manner this project could go forward on a smaller scale, to satisfy all involved.

Thank you,  
Margie Granese  
Town of Highland  
Minisink Ford

[Sent from the all new AOL app for iOS](#)

## Planning Board and Zoning

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**From:** ted weiner <tjweiner@yahoo.com>  
**Sent:** Saturday, November 4, 2023 11:17 AM  
**To:** Planning Board and Zoning  
**Subject:** Fimfo and eis

To whom it may concern , as a resident of the barryville highland township I ,as well as you, am concerned about the environment, residents, quality of life ,and the magical nature and feeling of the upper Delaware valley region . Besides which I believe we have a responsibility to protect this area for the following centuries and our descendants. Shusly I would like you to extend the public comment period concerning camp fimfo and IN particular ithe "scoping"and independent environmental study that is Proposed. I also urge you to use the national park services study as a template for the the template and guide .Thanks again for your work,concerns, efforts and ongoing representation of the area Sincerely yours, Theodore Weiner

## Planning Board and Zoning

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**From:** Julius Robinson <wildandscenic@gmail.com>  
**Sent:** Friday, November 24, 2023 1:31 PM  
**To:** Planning Board and Zoning; Toby Futter; Debra Perez; Dorene Warner; Robert Robinson; Mary Jane Skelly; Judith Khan; Andy Cogelosi  
**Subject:** FEMfO

Ladies and Gentlemen,

In reference to comments on the Draft Scoping Document, SEQRA Review, please take note of the following observations.

1. In the document "[Camp Fimfo SEQR Part \(2\)](#)", it is indicated that this project will have little or no impact on the water quality on waters adjacent to the Fimfo properties, Beaver Brook and the Upper Delaware River, however, there is no baseline data to support that projection.
2. There is a dormant landfill adjacent to this property with little or no information about the contents contained within and discharge of toxics should earth moving or the fracturing of water carrying rock formations on the adjacent property occur..
3. There is a new DEC launching, fishing and swimming access 1/4 mile downstream from this project.

Furthermore, it appears that the best scientific practices were not used to determine impact.

Therefore, without a baseline of water quality data for toxics and other pollutants entering the waterways adjacent to this property, this project should not go forward.

Sincerely,  
Julius Robinson, BS, Natural Sciences MS, Education

November 21, 2023

Town of Highland  
Ms. Monica McGil, Planning Board Secretary  
[planningboardzba@townofhighlandny.com](mailto:planningboardzba@townofhighlandny.com)  
4 Proctor Rd  
Eldred, NY 12732

**RE: Draft Scoping Document for the proposed Camp FIMFO development SEQRA review**

Thank you for the opportunity to make the following suggestions to the scope of the SEQRA review of the Camp FIMFO resort project in the Town of Highland NY. I am a 25 year resident of the Town of Highland.

My main concerns are as follows:

- A. The project as proposed does not comply with a number of provisions of the Town of Highland Zoning Code, in particular, the Town's definitions of a "campground," a "recreational vehicle" and a "temporary dwelling unit" appropriate to campgrounds as opposed to potentially permanent dwelling units described in the definitions for mobile homes, modular housing and manufactured housing.
- B. The project adds considerable infrastructure to a floodplain and may create significant hazards both in the Town of Highland and to communities downstream in flood situations.
- C. Climate change projections for our region indicate more precipitation, and more frequent extreme precipitation events as well as other impacts in the near future.
- D. There has been scant mention of other sustainability measures the project might employ in order to reduce its carbon footprint and environmental impact.

My suggestions are as follows:

1. In the "Existing Zoning" section (III Existing Conditions, Section A starting on page 6), the applicant should be required to give a full analysis of the rationale for the significant exemptions being sought through a special use permit in order to include company-owned, permanently installed recreational vehicles with full sewer and water hookup in the definition of a "campground."

According to the NYS Local Government Handbook, Section 16.5.4 on Special Use Permits: "The special use permit zoning technique (sometimes referred to as conditional uses, special permits or special exceptions) allows a board discretionary authority to review a proposed development project in order to assure that it is in harmony with the zoning and will not adversely impact the neighborhood [my emphasis added]." The "neighborhood" relating to this project is not only the adjoining properties but the environs of the Delaware River, its ecology, its unique status as a US designated "Wild and Scenic River," and its role as a critical watershed serving millions of residents downstream.

2. In III. E., Aquatic Resources and Floodplains, the scope should require a much more robust analysis of the projected impacts of climate change on floodplains in New York State, and of this site in particular. The project should not be allowed to rely on existing (historical) data on FEMA maps. Projections for increased normal precipitation, increased precipitation (as opposed to snow cover which allows for slow snow melt) in winter storms are available through NYS's ClimAID documents and recent updates. In addition, NYS's 2014 Climate Risk and Resiliency Act (CRRRA) requires that projects demonstrate that future climate risk has been considered in project design and in subsequent permitting decisions under NYS DEC purview. New York's 2019 Climate Act (Climate Leadership and Community Protection Act or "CLCPA") expanded on these requirements to include all climate hazards – such as high heat days and more frequent heat waves, high wind events, ice storms, coastal storms (hurricanes and tropical storms) making their way inland due to changing climate conditions, and extreme precipitation alternating with drought.

In August 2020, the NYS DEC issued the New York State Flood Risk Management Guidance for Implementation of the Community Risk and Resiliency Act - August 2020. This document states: "This guidance recommends that, to the extent feasible, regulatory and funding programs, and, most importantly, municipal zoning authorities discourage development in currently mapped floodplains as well as in marsh-migration pathways and other areas likely to be flood-prone in the future, as defined by the highest of the applicable general flood-risk management guideline elevations, described in Table 2. If it is not practical to avoid the flood hazard area defined by the highest applicable guideline elevation – 'reduction of density in the area or additional measures to provide flood protection based on the highest applicable guideline elevation should be considered.' However, these alternatives and the design considerations described below should be applied to development in current and future flood-prone areas only when siting elsewhere is not feasible [my emphasis added]."

Later, in a discussion of future riverine flooding, the Guidance makes the following statement: re future riverine flows (p. 15): "Flood elevations depicted on FEMA FIRMs are based on historical information, and do not include projections of flooding under future climate conditions. Although FEMA has taken steps to address this deficiency, FIRMs will not include future conditions in the near future. . . Presently, the best approach for projecting future flood-hazard areas is to project the future peak flow of a stream for the return interval of interest. A hydraulic analysis can then determine the projected flood elevation associated with the return interval of interest."

The FIMFO scope should require the project developers to procure a full analysis of potential climate-related risks by a firm with documented expertise in this field, and to describe in detail:

- a. The natural resiliency measures the project will implement in order to mitigate flooding onsite and protect surrounding areas and communities downstream from increased flooding that might result from these mitigation measures;
- b. A detailed hydraulic analysis of the potential for streams feeding into the Delaware to create flood hazards during extreme events, including the potential dangers of a breach in the Toaspern Dam in Yulan;
- c. A full and detailed emergency management plan that includes evacuation of the "RVIA-certified temporary camping structures" contemplated for the project, and the flood-resiliency of all water, sewage and electric equipment planned for the site;

- d. An analysis of indirect or secondary impacts, long-term impacts, and cumulative impacts on the environment and other potentially impacted communities as a result of this proposal's relationship with climate change factors. Cumulative impacts can occur when the incremental or increased impacts of an action, or actions, are added to other past, present, and reasonably foreseeable future actions;
    - e. Why "siting elsewhere" is not feasible.
  3. The scope should include discussion and analysis of sustainability measures the project will undertake, including but not limited to:
    - a. Renewable energy sources deployed onsite or through power-purchased from offsite facilities;
    - b. Net zero energy efficiency standards for all structures, including the (RVIA) certified temporary camping structures, the new welcome center, the new laundry facilities, camp store conversion and refurbishment (cooking equipment, etc.), bathhouses, storage buildings, the new aquatic play area and mini-golf course facilities;
    - c. A healthy materials policy for all new construction and renovations;
    - d. A "Green" hospitality and maintenance plan that includes specifications such as healthy, environmentally responsible cleaning products, landscaping (no pesticides or herbicides, use of native plants), food scraps diversion, and minimization of single use plastics in vending choices and facilities operation and maintenance;
    - e. "Green," environmentally-responsible demolition and disposal of materials that cannot be recycled for use in the new structures;
    - f. Rainwater harvesting to reduce the amount of freshwater used for wastewater systems.
    - g. Electric vehicles for use by maintenance team and to transport visitors onsite;
    - h. Permeable paving;
    - i. Publicly-available electric vehicle charging equipment.
  4. The scope should include a full discussion of reasonable alternatives to the proposed scale of the project, including a significant reduction in the number of "RVIA-certified temporary camping structures" and a corresponding increase in the number of low-impact tenting campsites.
  5. The project proposes an intensity of potentially year-round dwelling units that does not comply with the Town's zoning. The scope should discuss the feasibility of a decommissioning plan, similar to the requirements imposed upon community- and large-scale solar projects, in which the project developers demonstrate their ability to remove the non-complying dwelling units and supportive infrastructure in the event the development closes or is sold.

Thank you again for the opportunity to provide suggestions for the final scoping document for the FIMFO project.

Respectfully,  
John Back  
7 Harder Road  
Barryville, NY

## Planning Board and Zoning

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**From:** Janet Poppendieck <janpoppend@gmail.com>  
**Sent:** Tuesday, November 21, 2023 3:58 PM  
**To:** Planning Board and Zoning  
**Subject:** Draft Scoping document doe FIMFO EIS

Dear Planning Board,

I have read the draft scoping document for the Environmental Impact Statement for the FIMFO proposal. I am concerned that there is so little explicit attention to climate change. The stormwater management segment mentions 10- and 100 year floods, but not the need to recalibrate our expectations to reflect the obvious increased frequency of adverse weather events associated with our warming planet. I believe that all of the water-related impacts need to give explicit attention to the probable impact of climate change.

I find no discussion of fire hazards, again a problem we know to be associated with climate change. Our beloved area has been largely spared thus far, but we should not let that make us complacent. I urge you to amend the draft document to include an examination of fire hazards, including an assessment of the susceptibility of woodlands within and near the proposed project site to wildfire, and an assessment of the amounts and types of noxious substances that might be introduced into our atmosphere in the event of fires that ignited the new RV-type structures.

Again, I urge a requirement for explicit assessment of climate-related changes on all relevant components of the plan.

One other comment—or question. The draft document says that the total number of sites will be reduced from 342 to 339, and then predicts a reduction in total occupancy from 2838 to 2,354. This suggests a reduction in the average occupancy per site from 8 (8.298) to 7 (6.94). I would imagine that the average occupancy associated with the new RV-type buildings would be higher, not lower, than that associated with a



tent campsite. I would like to be reassured that the occupancy figures used to project environmental and ecosystem impacts are accurate and have taken into account any likely changes in length of stay.

Finally, I find myself concerned for the safety of campers, especially children, if a splash pad, pool and water play area are located across busy route 97 from the majority of the family camp sites. Has moving Route 97 to the South-Eastern side of the property, thus consolidating the camping and recreational facilities on the South-West side of the highway, been considered? I would hate to see this disruption of our Scenic Byway, but it would be better than a host of child casualties.

I thank you for the time and attention you have already invested in this process, and I hope that you will persevere in protecting our community from poorly designed and ill-thought-out development.

Sincerely,

*Janet Poppendieck*

Janet Poppendieck, PhD.  
142 Eldred-Yulan Road

## Code

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**From:** Planning Board and Zoning  
**Sent:** Friday, November 24, 2023 11:16 AM  
**To:** Code  
**Subject:** FW: SEQR Draft Scoping Document\_Camp FIMFO\_TofHighland\_Sullivan Co  
**Attachments:** ECL 8-0109 checklist\_blank.xlsx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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**From:** Taylor, Jennifer M (DOT) <Jennifer.Taylor@dot.ny.gov>  
**Sent:** Wednesday, November 22, 2023 11:59 AM  
**To:** Planning Board and Zoning <planningboardzba@townofhighlandny.com>  
**Cc:** Cammisa, Steve (DOT) <Steve.Cammisa@dot.ny.gov>; Newtown, Sarah (DOT) <Sarah.Newtown@dot.ny.gov>; Signorelli, Tony (DOT) <Tony.Signorelli@dot.ny.gov>; Niederriter, Cathy (DOT) <Cathy.Niederriter@dot.ny.gov>; Mangan, Kathryn (DOT) <Kathryn.Mangan@dot.ny.gov>; Mall, Ed (DOT) <Ed.Mall@dot.ny.gov>; Hahn, Paul E (DOT) <Paul.Hahn@dot.ny.gov>; Murphy, Sean W. (DOT) <Sean.Murphy@dot.ny.gov>  
**Subject:** SEQR Draft Scoping Document\_Camp FIMFO\_TofHighland\_Sullivan Co

Good Morning:

Below are NYSDOT's comments for consideration in the preparation of the final Scoping Document and Environmental Impact Statement.

The New York State Department of Transportation (NYSDOT) is an Involved Agency and will be issuing a Highway Work Permit for this project. To issue a permit, it must be confirmed that the State Environmental Quality Review Act (SEQRA) is complete. The Town of Highland Planning Board is designated as the SEQRA Lead agency and has indicated that an Environmental Impact Statement (EIS) will be prepared.

In compliance with 17 NYCRR Part 15.9, NYSDOT will need to write a Record of Decision to permit an action subject to a Final Environmental Impact Statement (FEIS). To write the Record of Decision, NYSDOT must confirm that the FEIS meets the requirements of Section 8-0109 of the Environmental Conservation Law. The Lead Agency should confirm that this section is satisfied in the EIS by referring to the attached checklist. In reviewing the Draft Scoping Document, it appears that information to address 2(k) is not included.

2 (k) effects of any proposed action on disadvantaged communities, including whether the action may cause or increase a disproportionate pollution burden on a disadvantaged community.

Potential impacts to disadvantaged communities should be addressed. Additionally, pursuant to Subdivision 4 of Section 8-0109 of the Environmental Conservation Law, the FEIS shall include copies or a summary of the substantive comments received and the Lead Agency's responses to such comments.

The FEIS should demonstrate that the project alternative permitted by NYSDOT is an alternative which minimizes or avoids adverse environmental effects to the maximum extent practicable, including disclosed effects. The FEIS should also demonstrate that adverse environmental effects revealed in the EIS process will be minimized or avoided to the maximum extent practicable.

Please direct the Final Scoping Document and future SEQR correspondence to my attention via email or at the mailing address included in my signature line below.

*Sincerely,*

**Jennifer Taylor**

Public Involvement Leader/SEQR Coordinator

**New York State Department of Transportation, Region 9**

44 Hawley Street, Room 1402, Binghamton, New York 13901

607-721-8257 | [jennifer.taylor@dot.ny.gov](mailto:jennifer.taylor@dot.ny.gov)

[www.dot.ny.gov](http://www.dot.ny.gov)

SECTION 8-0109

Preparation of environmental impact statement  
 Environmental Conservation (ENV) CHAPTER 43-B, ARTICLE 8  
 § 8-0109. Preparation of environmental impact statement.  
 Included in the Document? Language from § 8-0109

Where is it (section) in the DEIS/  
 ROD? COMMENTS on content?

<p>1. Agencies shall use all practicable means to realize the policies and goals set forth in this article, and shall act and choose alternatives which, consistent with social, economic and other essential considerations, to the maximum extent practicable, minimize or avoid adverse environmental effects, including effects revealed in the environmental impact statement process.</p> <p>2. All agencies (or applicant as hereinafter provided) shall prepare, or cause to be prepared by contract or otherwise an environmental impact statement on any action they propose or approve which may have a significant effect on the environment. Such a statement shall include a detailed statement setting forth the following:</p> <p>(a) a description of the proposed action and its environmental setting;</p> <p>(b) the environmental impact of the proposed action including short-term and long-term effects;</p> <p>(c) any adverse environmental effects which cannot be avoided should the proposal be implemented;</p> <p>(d) alternatives to the proposed action;</p> <p>(e) any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented;</p> <p>(f) mitigation measures proposed to minimize the environmental impact;</p> <p>(g) the growth-inducing aspects of the proposed action, where applicable and significant;</p> <p>(h) effects of the proposed action on the use and conservation of energy resources, where applicable and significant, provided that in the case of an electric generating facility, the statement shall include a demonstration that the facility will satisfy electric generating capacity needs or other electric systems needs in a manner reasonably consistent with the most recent state energy plan;</p> <p>(i) effects of proposed action on solid waste management where applicable and significant; and</p> <p>(j) effects of any proposed action on, and its consistency with, the comprehensive management plan of the special groundwater protection area program, as implemented by the commissioner pursuant to article fifty-five of this chapter; and</p> <p>(k) effects of any proposed action on disadvantaged communities, including whether the action may cause or increase a disproportionate pollution burden on a disadvantaged community; and</p> <p>(l) such other information consistent with the purposes of this article as may be prescribed in guidelines issued by the commissioner pursuant to section 8-0113 of this chapter.</p> <p>Such a statement shall also include</p> <ul style="list-style-type: none"> <li>- copies or a summary of the substantive comments received by the agency pursuant to subdivision four of this section, and</li> <li>- the agency response to such comments.</li> </ul> <p>The purpose of an environmental impact statement is to provide detailed information about the effect which a proposed action is likely to have on the environment, to list ways in which any adverse effects of such an action might be minimized, and to suggest alternatives to such an action so as to form the basis for a decision whether or not to undertake or approve such action.</p> <p>Such statement</p> <ul style="list-style-type: none"> <li>- should be clearly written in a concise manner capable of being read and understood by the public,</li> <li>- should deal with the specific significant environmental impacts which can be reasonably anticipated and</li> <li>- should not contain more detail than is appropriate considering the nature and magnitude of the proposed action and the significance of its potential impacts.</li> </ul>		
		<p style="color: red;">Addition to list effective 12/30/2024 (with corrective re-lettering of list items)</p>

November 21, 2023

To the Planning Board of the Town of Highland, and Whom It May Concern:

The below are my comments and notes for the Draft Scoping Document regarding “Camp FIMFO.”

### **REQUEST FOR ACCURATE DESCRIPTION OF PROJECT**

That this project is called the “Modernization and Improvement Project” is clearly a tactic to cloud the full scope of Camp FIMFO, as it is a large-scale development of a resort property, RV park with attractions including swimming pools and waterslides, and substantially changes, the use, purpose, and intent of a traditional campground.

Going forward, it is requested that the project be re-named to more accurately reflect the scope of this project.

Also to this end, a full report on the process of confirming or approving “existing use” is required, as common sense indicates that this sort of large-scale construction and massive development does not conform to the “existing use” of a traditional campground.

### **NECESSARY BACKGROUND AND HISTORY OF THE PROJECT CORRESPONDENCE AND COMMUNICATIONS**

To fully understand the impact of this project, and the public’s very reasonable concerns, a full, detailed history of the communications of the project should be produced, beginning with the original proposal as it was brought to the Sullivan county, and the town, along with records of every meeting, and all correspondence, including but not exclusively related to economic incentives, such as exclusively tax abatements, PILOT programs, grants, and other incentives, and promises either in writing or implied.

There are many questions germane to this project and the reasonable concern that even with this impact study, the approval of CAMP FIMFO may well be expedited to the benefit of few and the expense of many, namely the people of the Town of Highland and their neighbors along the river corridor, including communities far south of Sullivan county where folks depend on the river for drinking water.

This study should require full disclosure of any and all communication, or promises made on the part of the town to FIMFO, or vice versa. Any existing or ongoing relationships, or communication, outside of official correspondence, between members of the Planning Board, the town, and the applicant must now be made public.

A full review of the SEQR process is now requested to identify false or misleading statements by the applicant, and accepted without due diligence by the town, including, but not limited to statements on their previous SEQR forms and questionnaires stating no to little impact on large-scale construction, including clearing of 17-plus acres of mature trees and the building of massive septic systems, almost eight acres of new roadways, a large-scale laundry facility, two large chlorine pools, and many other recreational amenities and features that require earthmoving, and enormous power and equipment.

Some of these concerns have been previously been challenged in public forums including the online community pages and local newspapers, but have routinely been ignored by the applicant.

To best ability possible, ALL public comments made by citizens of the Town of Highland, either by emails or letters to the town, or made in-person by verbal questions at the open meetings should inform this study.

This includes, but is not limited to:

All public comments made during the open public meetings regarding FIMFO held at the Eldred High School, and all correspondence submitted by the public during that time frame, as well as any written correspondence sent to the town regarding the project, before or after.

Special attention should be made to include ALL public comments made by the town's representative to the UDC, (and former Supervisor) Andy Boyar.

Special attention should be made to include all correspondence from the Delaware Riverkeeper.

Please review Any and all correspondence from the public to the Town, regarding the Environmental Impact Study, or in response to comments from the Planning Board or the Applicant, including those requesting the EIS study, and those in protest of bullying, anti-Semitic language used by the applicant Northgate's lawyer in the letter from the law firm of Brown and Weintraub, dated August 16th.

Please review all comments made by the public and the Delaware Riverkeeper made during the open public meeting regarding FIMFO on September 14, and held at St Anthony's Church in the town of Highland. A recording of this meeting is available on YouTube at:

<https://www.youtube.com/watch?v=gdeFzbiWjC4>

Please review all reporting from local newspapers expressing the voice of the public as a further record of public comment.

Please include any other relevant communications that occurred between the applicant and the town.

An inquiry must be made to uncover any formal or informal promises that were made by the Town to the applicant to expedite the process.

An inquiry must be made as to the influence or relationship between the applicant and the camping industry, with the Sullivan County IDA, and the Sullivan County visitors association.

All public comment periods, should be extended to at least 90 days, and a rigorous effort made to engage the public through online announcements, display advertising in newspapers, direct communication from the Town, and all other means of commonly used communication. These messages should seek comment from anyone potentially affected which includes but is not limited to all communities up and down River corridor and anyone impacted by traffic, and those who use the Delaware river as a source for drinking water.

All Future public hearings should be available through Zoom or similar video conferencing technology, and not be hindered by arbitrary time limits, or any other limitation on the right to comment, including intimidation by the Planning Board or the applicant, or any other behavior that inhibits free speech and the right of the public to speak openly and without fear of recrimination, All future meetings must meet the obligation of the Town to obey all Open Meeting and Sunshine laws.

### **IMPACT ON COMMUNITY CHARACTER AND HOSTILE DISCOURSE**

This EIS process should include a public reprimand for all corporate intimidation techniques from the applicant, including but not limited to bullying, threats of lawsuits, intolerant and hate-filled language by their counsel, the letter to the town from the law firm of Brown and Weintraub, dated August 16, 2023, and the coarse dismissal of public outcry, are essential to this impact study. This was addressed publicly in a letter to the town from the Delaware Riverkeeper dated September 1, which must be part of this scoping process.

There have been many letters of protest from the public, including religious leaders, only some of which have been made public.

The letter (from Brown and Weintraub) was painful to many residents –

It is ironic since when FIMFO first presented their project publicly, they used old-fashioned and stereotypical Jewish tropes, that the Town of Highland was the Borchst belt, and therefore they “understood us” – but what it showed in fact was complete insensitivity to our large Jewish population and its history in Sullivan County.

## **REQUIRE SENSITIVITY TRAINING FOR ALL EMPLOYEES AND MANAGMENT**

With the current climate of global anti-Semitism, and to protect our town, and maintain civility, decorum, and protect the civil and human rights of all involved, every member of the FIMFO team, should be required to attend mandated sensitivity training.

What's more, the Brown and Weintraub letter put forth a more general anti-religious argument, one that was publicly rebuked (without response from the applicant) by the local Catholic church, as well as two prominent Methodist ministers.

A document commissioned by the UDC, written by Tom Shepstone, lobbying for the FIMFO project and the camping industry, was read into the record at the Planning Board meeting of September 27, 2023. This document and its commission requires further scrutiny. The author has a past record of attacking and ridiculing environmental activists. The commission of this document was a direct conflict as the author was admittedly, previously employed by Northgate Corporation.

Please include in your analysis the study by George M Janes & Associates submitted by the Delaware Riverkeeper. This that was submitted on Sept 26<sup>th</sup> to the Town Planning board but was not read into the record on the September 27<sup>th</sup> meeting.

## **IMPACT ON TOWN'S GOOD REPUTATION FOR DIVERSITY AND UNITY**

Fostering an anti-religious climate would have a negative impact on the community, and should not be beyond the scope of this study. The question must be asked if this hatred will continue by the applicant, and what are the recourse could be made to dissuade the applicant from creating a toxic environment in the Town of Highland that would directly impact our public reputation as one as welcoming and diverse, and by extension the economic future of our town.

## **BARNES LANDFILL**

The Barnes landfill must be investigated and studied thoroughly.

The due diligence of FIMFO - and what did they know about this potential problem, and when did they know it – speaks directly to the good faith effort of the applicant to protect the environment and act in the most professional and responsible manner while conducting business in our town.

## **ECONOMIC RISKS AND BENEFITS**

Part of the EIS study should show full financial and demographic projections and the full impact on the local economy, The public should know the true cost of the project. The study should



include the planned price structure of their resort, and a socio/demographic study of previous clientele at the existing campground, and a comparison with the new FIMFO camp guests.

Further, it must be asked as part of the study, what happens if their numbers are not reached, or if the business model become unsustainable, and what will be the ensuing impact on our environment and economy?

### **WHAT IF FIMFO FAILS?**

What if the project proceeds but is unsuccessful?

There is fear that they could leave hundreds of dwellings that could become a “subdivision,” or permanent housing, doubling the size of the town.

What are the protections in place for the town if FIMFO proceeds, but is unsustainable?

Will FIMFO leave the area clean and unfettered, even if they are ware-housing while looking for a buyer, and what are the guarantees that any new buyer will follow the results of this impact study, and invite the highest level of scrutiny from the town and all governing agencies, going forward.

### **GRANTS AND INCENTIVES**

What are the conditions for the grant from the Sullivan County IDA, and the PILOT program, and what if they are not met?

What happens if the water park is not built, or if the plan in any way is not completed, are the economic incentives from the county the same, and how does this impact construction and the future of the property?

### **BEST RECYCLING PRACTICES, USE OF PLASTIC**

To date, the applicant has offered no plan regarding green technology, recycling, renewable or sustainable energy, or best environmental practices in accordance of the Town’s comprehensive plan and the repeated inquiry of residents during public hearings.

The EIS should include a full report on FIMFO’s plans for best green practices and technology, in accordance with the Town’s Comprehensive Plan,

The good faith and community-driven mandate of “DO KNOW HARM”, and “LEAVE IT BETTER THAN YOU FOUND IT” should be included as directives to the applicant.

## **FLOOD EMERGENCY PREPARATION**

This project will be built in a known flood zone in a high-risk area along the river. Many residents recall the historic floods of the past twenty years, and seeing mobile homes and construction equipment being washed into the river.

A full EIS study must include a readiness plan and procedures for periodic staging of emergency protocols, removing all non-permanent structures, including the Park Model RVs, and placing them outside the danger zone in a timely manner.

- How long will it take to move all non-permanent structures?
- What is the preparation required for this kind of safety protocol?
- Where will the RVs and other materials, equipment etc be moved to?
- How large a facility is needed to store them off-site?
- What sort of machinery is needed to move them and where will that be stored, and who maintains this. Is it in the town of Highland?
- Does the facility have a procedure for evacuation when needed?
- What infrastructure is needed, and what will the impact on traffic be when evacuation begins.
- What about the safety of chlorine pools during a flood? How quickly can they be drained, where does the water go, what vehicles and machinery are necessary?
- Will there be someone in charge of readiness, and inspecting this emergency plan periodically?
- What happens in the eventuality of a power outage during a storm?
- Does the FIMFO camp have generators sufficient to empty pools and move the proposed hundreds or RVs?
- Are the water slides at risk of creating dangerous conditions the event of a severe storm – how do we know they will not become a hazard in high winds and other extreme weather conditions?
- What are the mechanisms in place to protect the road and the river in the event of a flood, storm, or other act of God?

There should be a fully scaled evacuation exercise, witnessed by an independent party, with a public report of the results, including time tables, safety, and all knowable risks . An evacuation procedure manual should produced, and studied or scored by experts hired independently of the applicant and approved by the National Park Service, the Town of Highland, and all interested parties.

Plans for flood evacuation must include plans for 100 year and 500-year floods, keeping in mind the unprecedented floods of the past 20 years, and the effects of climate change and increasingly unpredictable, extreme weather.

## ZONING LAWS AND DENSITY ISSUES

The Town's zoning laws are out of date and were written at a time when it was impossible to anticipate a large, corporate camping industry whose stated goals is to move camping indoors, and away from a traditional camping experience and towards a resort vacation, whose hallmarks are convenience and comfort. These goals stand in stark contrast to the towns comprehensive plan.

Much of the FIMFO plan is based upon the business of manufacturing and installing "Park Model RVs" into traditional campsites, and skirting variances and new permits. Objection to the Park Model RVs, is at the heart of the National Park Services declaration of non-conformity.

The RV industry, while carefully working through loopholes to describe these structures as "temporary," has described the Park Model RVs as resembling "Tiny houses... Think hunting lodges, camping cabins, or just small vacation houses."

Common sense indicates that the park model RVs are in fact small, individual residences, resembling small homes, and do not conform to the intent of the zoning laws, whose purpose in part is to protect the town from over-development and increased density.

Generally, even if they are only used seasonally, Park Model RVs are left in place year-round. The obvious contradictions of "permanent vs. temporary" therefore must be examined in this study. The RV industry also advises that they can be winterized, or fitted with awnings, exterior porches, garages, and other updates making them more permanent "home away from home(s)."

The EIS must address the redefinition of these park model RVs as permanent structures and dwellings.

The credible, informed, and highly important public opinions on these subjects by comment by experts, including the Town of Highland's representative to the UDC and the National Park Service, must be included in the Scoping document.

This study should include an evaluation of the density of proposed structures by FIMFO, with careful attention to "fuzzy" math that skirts the intent and purpose of the regulations. For example: it cannot be believably stated, that if there are 200 dwellings built on two acres, that there is only "one dwelling per acre" because the total property is 200 acres.

What's more, the capacity of the intended structures should be studied as well in terms of allowed density, as the current plan put forth by the applicant allows for hundreds of guests in relatively small areas, creating health and safety concerns, as well as noise, odors, and other negative environmental impacts associated with crowded areas.

## **THE IMPACT OF CORPORATE DEVELOPMENT IN RURAL AREAS**

The nature of corporations is to prioritize their shareholders over any other concern, in fact, this is their duty. However, this creates a large conflict when developing a rural area, especially one whose resources are protected, and delicate, and irreplaceable.

Questions need to be asked as to the commitment of the applicant to protecting the river. As they have stated vociferously that they do not intend to follow the directive of the National Park service, the federal agency charged with protecting this area, it is fair to question what assurances will the public have that no harm will be done, that protecting the river, the environment and the rural way of life will be prioritized, especially when this corporation has no history here, and no full understanding of the area or townspeople.

Furthermore, a full study is requested as to the impact this will have up and down the Delaware River Corridor. Will the FIMFO development set a dangerous precedent for higher density and more building along the Upper Delaware?

Historically, what has been the long-term impact of corporations buying and developing large areas in rural areas?

This study should include the impact of similar projects promoted and supported by the National Association of Recreational Vehicles and Campgrounds (currently rebranding to be known as Advance the Outdoor Hospitality Industry), which actively promotes, lobbies, and advocates for flipping traditional campgrounds into resorts and glamping experiences, built on high-density RV parks featuring the so -call park model RVs?

This study should include the applicant's other properties, and their reputation, including intended projects that were denied by local planning boards out of concern for the environment and negative impact on the area in which the proposed resorts were to be built, as well as the applicant's unreliable estimates of impact and water usage which have been questioned by other municipalities.

The Impact study should also require a publicly available detailed annual report of actual water usage including waste water, swimming pools, all septic, laundry, and any actual water use, compared to FIMFO projections.

This study should also include the source of all water, the risk to any local water sources, both in terms of supply and contamination, and include projections and contingencies for any manner of storm, drought, or other act of God.

## **THE NATIONAL PARK SERVICE**

The applicant's refusal to adhere to the determination of the National Park Service that the FIMFO project is not conforming to the River Management Plan, and the Planning Board's

refusal to support this determination, is great cause for alarm, and the implications are of great concern.

There must be an inquiry as part of this study on the impacts of the applicant's and the Town's response to any future determinations by the NPS. There must be an understanding of the potential precedent set by these recent actions. Will other properties, corporations, local businesses, private citizens, or anyone now residing or doing business on or near the river or in an area covered by the River Management Plan be free to ignore the protections set forth by the National Park Service and by extension the Federal Government and any governing body?

Questions remain as to what this means to the future of the River Management Plan – does disregarding it, as FIMFO has done, threaten the validity of the UDC and their overseeing of the river and our environment?

If the authority of the River Management Plan is minimized, what is the impact on our Town and the River corridor in five, ten, twenty, fifty years?

What recourse will future generations have, and how does this impact the ability of our town to thrive and succeed and attract new homeowners, and new businesses?

## **PROPERTY VALUE**

What will be the impact of this project on the value of homes in the area?

People have been traditionally attracted to live here because of the bucolic, non-corporate nature of our area. FIMFO's resort will change that.

The impact on property values of homes in the Town of Highland and adjacent areas, especially those that use Route 97 and the River Corridor as a main artery for travel and recreation. This includes but is not limited to the hamlet of Barryville, but also Narrowsburg to the North, where relatively undeveloped river access and traditional campgrounds are essential to our character and value.

## **PARK MODEL RV CONSTRUCTION AND FUTURE DEVELOPMENT**

While Northgate Resorts and their associated brands appear to be focused on building resorts and waterparks, their partner, Sun Communities, Inc, which is a publicly traded company, is in the business of building, selling, and installing Park Model RVs which are at the heart of the FIMFO project and one of the greatest areas of concern.

It is reasonable to assume that Sun Communities business and responsibility to their shareholders is to grow their business by selling, manufacturing, and installing the so-called Park Model RVs.

A full inquiry into the proposed business model is required as the impact on this and other communities up and down the corridor – including environmental and community issues - cannot be underestimated.

Will they commit to no further development or expansion, or addition of new Park Model RVs, if this project is in any form is approved?

## **REQUEST FOR REALISTIC VISUAL DEPICTIONS**

Complete visual depictions of the proposed project have been promised and not delivered. Animated depictions of the view of the proposed project did not include any vehicles, further clouding the good faith of applicant.

Visual projections, during the high season and in winter when foliage and tree coverage is limited, must be presented, including but not limited to views from the river and the road.

There are important aesthetic values at play at will affect the town in all manners described above, including our rural character, our property values, and any precedent set for future developments. Fair and honest depictions weighed against the River Management Plan, the Town's Comprehensive Plan, and good common sense must be included.

## **SUMMARY**

The FIMFO project has been described as the largest project of its type in the history of Sullivan county, and it has been fraught with problems from the beginning, including ever-changing plans and challenges from the public and the National Park Service.

The projects managers, owners, and legal representatives have shown a record of bullying, intimidation, and threats to the town, and have effectively created great public discord. This impact is already being felt, as witnessed at the numerous Town meetings, and by the outpouring of protest from an engaged public.

There is no question that this project will change the character of the town. The purpose of this scoping and the environmental impact study is to determine the true impact on our river, our environment, and the nature, character, and future of our town.

It is essential that this study and scoping be thorough and out of an abundance of concern for our citizens, our river, our natural resources, and the future of our families, be conducted passionately and without regard to the applicant's demands or threats.

I am faithfully submitting this letter, for the public record, and as a citizen of the Town of Highland.

Very sincerely,

Mike Edison  
Town of Highland