



November 21, 2023

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

Submitted electronically to: [planningboardzba@townofhighlandny.com](mailto:planningboardzba@townofhighlandny.com)

**Re: Delaware Riverkeeper Network Second Supplemental Comments regarding Camp FIMFO Draft Scoping Document**

Town of Highland Planning Board,

The Delaware Riverkeeper Network submits this additional comment that supplements our comments dated November 9 and November 18, 2023.

Based on communications from Planning Board members to members of the public, it seems the Planning Board may be inclined to reject/ignore comments submitted by the Delaware Riverkeeper Network given that the location of our main office is not in the Town of Highland. To reject comments submitted by the Delaware Riverkeeper Network would be wholly inappropriate and against the mandates and spirit of applicable law. The Delaware Riverkeeper Network is a regional organization that works throughout the Delaware River watershed states, and when necessary, at the federal level, this includes a robust and long history of work in New York State and in the Upper Delaware River region to protect the main stem including the Upper Delaware River that will be a direct recipient of the adverse impacts at issue, as well as protecting tributary streams such as Beaver Brook, the River's watershed, and watershed human and natural communities. In addition, the Delaware Riverkeeper Network has over 170 members that live in Highland -- as well as many more that recreate, vacation, visit and enjoy the communities, natural resources and businesses located in the Town of Highland -- and our comments are submitted on behalf of our organization and our members, including those that reside in the Town of Highland.

We are aware that representatives for the Planning Board are using dismissive and disparaging characterizations with regards to public information being provided by the Delaware Riverkeeper Network to encourage and support public engagement, information, and awareness regarding the Draft Camp FIMFO Scoping Document and public comment period.

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It is wholly inappropriate for any Planning Board member, including its Chair, to respond to comments submitted by the public regarding the Camp FIMFO proposal with an aggressive or negative tone. This abuse of discretion and power taints the Town's decision-making process.

The Planning Board's obligation remains to objectively review the comments being provided and it is wholly inappropriate for any member of the Planning Board to respond to public comments in a way that makes commenters feel uncomfortable and/or may taint, influence, undermine, or dissuade the engagement by members of the public in the current, or future, public comment process regarding Camp FIMFO.

The Scoping Document and DEIS should include an analysis of the number of people, on a daily basis, a weekly basis, and a monthly basis that will be staying at the Camp FIMFO operation.

Representatives for Camp FIMFO have represented that they expect significant numbers of Camp FIMFO "campers" or "visitors" to use the River for recreational purposes such as tubing, kayaking, canoeing, swimming, etc. Accordingly, the Scoping Document and Draft Environmental Impact Statement (DEIS) should analyze and provide details on:

- the number of recreational users the proposed project will place on the Delaware River,
- the carrying capacity of the Upper Delaware River, and
- the water quality as well as ecological impacts of the recreational users who are staying at the Camp FIMFO site that will utilize the Delaware River River for tubing, kayaking, canoeing, swimming, and other on water recreational purposes.

This analysis should consider the users and impacts resulting from Camp FIMFO clientele, as well as analyze the cumulative impacts with recreational users from other operations.

The Scoping Document and DEIS should include an analysis of the increased need for emergency services as a result of the more intense use of the site.

The Scoping Document and DEIS should include an analysis of the scale of this proposed project in comparison to the scale of other campgrounds in the region in terms of scale of use and the scale of community and environmental impact.

The Scoping Document and DEIS should include an analysis of the density of the number of RVs, glamping cabins/tents/structures and tent camp sites, vis a vis one another and in comparison to the current density of tent campsites.

The Scoping Document and DEIS should include an analysis of the impacts of the proposed laundry facilities proposed for the site including the volume of laundry expected to be done in the facility, the volume of water use and water discharge, any water quality or pollution impacts from the facility, and the amount of power that will be used to support the laundry operations.

The Scoping Document and DEIS should include an analysis of the precedent being set regarding the interpretation of the Town of Highland ordinances, and requested variances.

The Scoping Document and DEIS should include an impacts analysis of the foreseeable use of the new RV focused park for year round, or at least extended use in dates and times, as compared to the current seasonal use of the site. This analysis of impacts should include impacts to the community, to the environment, to wildlife, to businesses in the region, to traffic, for emergency services, for property values in the adjacent community, and for municipal, county or state services in the region.

Respectfully submitted,

A handwritten signature in blue ink that reads "Maya K. van Rossum". The signature is written in a cursive style with a long horizontal line extending to the right.

Maya K. van Rossum  
the Delaware Riverkeeper