

To: Town of Thompson Planning Board

Re: Heiden Road Warehouse Project - Draft Environmental Impact Statement (DEIS) - comment

Date:

To the Town of Thompson Planning Board,

I am submitting this comment as a concerned local resident and watershed stakeholder. I request that these comments be included in the official record of the DEIS review process.

1. The DEIS must include a maximum-intensity operational assumption

The project proposes a 1.5 million square foot warehouse and trucking terminal without identifying a tenant or end-user. Because the proposed use is not defined, the DEIS cannot reasonably assess impacts unless it includes a maximum-intensity operational scenario.

The DEIS should explicitly model and disclose impacts under:

- maximum truck trips per day (including 24-hour operations)
- maximum employee shifts and staffing levels
- maximum water use and wastewater discharge
- maximum impervious surface runoff and stormwater discharge

Without these assumptions, the DEIS cannot accurately evaluate traffic, stormwater, water quality, or infrastructure impacts, and the environmental review is incomplete.

2. The DEIS must evaluate the potential for secure or high occupancy uses

Because no tenant is identified, the DEIS must address the possibility of future uses that significantly alter environmental and infrastructure impacts, including secure or high-occupancy uses.

This is not speculation; it is standard SEQRA practice to analyze reasonably foreseeable future uses when a project's tenant is unknown and the site is entitled for broad industrial use.

At minimum, the DEIS should include:

- a high-occupancy scenario
- a secure facility scenario
- a worst-case wastewater and stormwater scenario
- a worst-case traffic scenario

3. The DEIS must analyze impacts to the Neversink River watershed as a whole

The site is adjacent to the Neversink River, a Class B protected trout stream and a critical regional watershed. The DEIS must evaluate:

-
- cumulative impacts on water quality and aquatic habitat
- stormwater runoff during extreme weather events
- potential long-term degradation from increased impervious surface
- sedimentation and thermal impacts
- impacts to protected wetlands and regulated streams

This analysis must include credible modeling and must not rely on generalized statements or assumptions of "best management practices" without quantification.

4. Wastewater treatment and water withdrawal must be modeled with worst-case assumptions

The project proposes on-site wells and package wastewater systems. Package systems in this region have documented histories of failure and inadequate maintenance. The DEIS must include:

- a detailed evaluation of package wastewater system feasibility
- contingency planning for system failure
- Impacts to groundwater and surface waters if systems fail
- evaluation of alternative wastewater options (including municipal connection if feasible)
- projected water withdrawal volumes and impacts to aquifers

5. The Planning Board must adopt binding conditions prohibiting detention-type uses

Commented [1]:

Even if the DEIS is deemed adequate, the Town must protect it self from future uses that would be inconsistent with community expectations and watershed protection. The Planning Board should require a binding condition that prohibits:

- any overnight confinement or detention
- any secure holding or controlled egress facility
- any use involving involuntary confinement
- any facility operated for custodial purposes, including by private contractors or government agencies

A condition based on function (not on naming a specific tenant) is legally defensible and necessary to ensure the project cannot later be converted to a detention or secure holding use under the guise of "industrial" or "warehouse" occupancy.

6. The DEIS must include a full alternatives analysis

The DEIS must evaluate reasonable alternatives, including:

- smaller footprint alternatives
- alternative locations with less environmental sensitivity
- alternative wastewater and stormwater designs
- reduced impervious surface alternatives
- alternatives that exclude high-occupancy or secure uses

Conclusion

This project is large enough and environmentally sensitive enough that incomplete analysis or open-ended future uses would create irreversible harm to the Neversink River watershed and to the Town of Thompson. For the DEIS to be adequate, it must include worst-case operational assumptions, robust water and stormwater analysis, and binding conditions preventing detention-type uses.

Thank you for your consideration.

Respectfully,

[Name, Title]