



United States Department of the Interior
NATIONAL PARK SERVICE
UPPER DELAWARE SCENIC AND RECREATIONAL RIVER
274 River Road
Beach Lake, Pennsylvania 18405



IN REPLY REFER TO:
10.B (UPDE-4870)

February 17, 2023

Chairman Aaron Robinson
Upper Delaware Council
211 Bridge Street
Narrowsburg, NY 12764

Re: Camp FIMFO Substantial Conformance Recommendation

Dear Chairman Robinson,

We are responding to the recommendation from the Upper Delaware Council (UDC) dated September 2, 2022 for a finding of substantial conformance to the Upper Delaware River Management Plan (RMP) for the special use permit application from Camp FIMFO in the Town of Highland, NY. As noted in our November 9, 2022 reply, NPS requested more information to properly evaluate the application.

We have reviewed the responses and updated submittals sent to the Town of Highland on January 11, 2023 and the advance materials submitted for the February 22, 2023 Highland Planning Board Meeting. Upon review of this information, NPS continues to have concerns and unanswered questions about the proposal. We request UDC engage with NPS, the Town of Highland, and the applicant to obtain the information noted below. Without this additional information, NPS cannot make a determination of substantial conformance to the RMP.

The submitted plans lack specificity on vegetation disturbance. NPS must see the total limits of disturbance, lot coverage, and areas that will be disturbed. The plan needs to indicate the calculations by either a chart or methodology that shows total scope of disturbance. Previous responses indicate the current lack of specificity is due to awaiting feedback on the site plans from the New York State Department of Health (DOH). NPS requests the detailed plans following the inclusion of DOH amendments.

Hydrologic and hydraulic (H&H) modeling for this section of the river and floodplain is required to inform an NPS decision. The most recent response indicates a decision was made that 298 cubic yards of net fill did not require modeling to understand base flood elevations changes resulting from the proposed development. In consultation with regional and national NPS hydrologists, although this amount of net fill may not significantly change base flood elevations, we need additional information about the extensive amount of earth moving involved in the proposed cut (11,342 cubic yards) and fill (11,641 cubic yards) areas within the 1%-annual chance floodplain.

INTERIOR REGION 1 • NORTH ATLANTIC-APPALACHIAN

CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, PENNSYLVANIA, RHODE ISLAND, VERMONT, VIRGINIA, WEST VIRGINIA

H&H modeling is a prudent analysis that will inform all stages of the project and erosion and sedimentation (E&S) control plans within this flood prone area. Given the proximity to the river, the modeling will help ensure E&S control measures adequately prevent potentially significant impacts to the river resources during the project and into the future.

In addition, based on the plans submitted January 11, 2023, the cut and fill boundary appears to be within 100 feet of the mean high-water mark of the river. This boundary needs to be verified, and if applicable NPS needs assurances the project meets the town's requirements to prevent erosion.

The RMP and Land and Water Use Guidelines require NPS to consider landscape character and land use patterns, specifically considering impacts to recreational resources. The recreational experience and visual landscape of primary concern to NPS is the view from the river and its banks. The provided simulation, from a vehicle on Route 97 looking away from the river, does not allow NPS to determine if the proposed changes will detract or degrade the unique characteristics of the Upper Delaware River in this recreational segment. We request 360-degree renderings or visualizations of the proposed development, particularly from the center of river, the riverbanks, and Route 97 towards the river.

Lastly, NPS requests a high-water event evacuation plan to adequately protect natural resources. Although the proposed use of camping is consistent with historical use, park model RVs and associated utilities reflect a substantial change in the type of infrastructure on the site. Previous responses state Camp FIMFO operators will remove all infrastructure in advance of high water.

During a 2006 flood event, more than 20 trailers from a campground within the 100-year floodplain in Hankins, NY washed downriver. Despite a high-water warning, the campground operator was unable to disconnect and remove all infrastructure in advance of the flood. Much of that debris remains in the river today. To ensure the protection of health, safety, and welfare of the residents and visitors and the protection and preservation of the natural resources of the river, NPS requests a plan detailing how the applicant will disconnect utilities and remove the 146 park model RVs, as well as the materials for 64 on-site tents, upon receipt of a warning and prior to a high-water event.

Without this additional information, NPS cannot make a final determination on concurrence with the UDC recommendation of substantial conformance. Once the requested information has been received, NPS will continue our review of the application.

If you have questions, please contact me at Lindsey_Kurnath@nps.gov or 570-729-8251 x2225.



Lindsey Kurnath
Superintendent
Upper Delaware Scenic & Recreational River