

March 6, 2025

Town of Cairo Planning Board

Dear Planning Board members,

My wife and I bought our home here in November 2019, and added onto it last year. We've made wonderful friends and our son is a kindergartner at Cairo-Durham Elementary. Cairo is where we've chosen to raise our son and where we expect to live for the rest of our lives. We are deeply committed to this community and invested in its continued success and evolution.

I've followed the Round Top development since shortly after it was proposed with interest. A development of this size and scope could generate a significant amount of tax revenue for the town to support public services that benefit all of us. However, based on my reading of the Planning Board's negative State Environmental Quality Review Act (SEQRA) declaration and Part 3 of the Full Environmental Assessment Form (FEAF) narrative, you significantly downplay the potential environmental impacts of this project and outright ignore the report issued by your own hydrogeological consultant in favor of the assertions provided by the developer's own environmental engineer.

"It is the opinion of HVV that additional analysis would be needed to support the conclusions of the report," according to Hanson Van Vleet, the consultant you hired to review the developer's water report and whose conclusions you failed to mention once in the documentation you provided to justify your negative SEQRA declaration and Part 3 of the FEAF narrative.

HVV's review questioned a hypothesis in the developer's report that private wells near the development that did not adequately recover after a 72-hour test pumping period of new test wells dug at the development site wouldn't be permanently impacted because of a second lower aquifer. The consultant wrote "this conclusion is not well supported by the pumping test data and is a risky assumption based on the rate of recovery observed."

The review went on to say that long term use and over-pumping of the aquifer "would result in a reduced static water level" at the private wells, calling that "a significant concern." HVV's review stated that "full recovery to pre-test levels took greater than 10-days."

"The lack of recovery to pre-test static water levels at the offsite wells after significant periods of pumping inactivity at the proposed production wells may indicate that the withdrawal rate of 32 gpm at wells 4 and 5 may be too high relative to the available groundwater recharge in the aquifer intercepted at wells 4 and 5," the review stated.

The review criticized a 180-day projection of the pumping test data to support safe yields of 32 gallons per minute, the supposed maximum water drawdown at the development's full capacity from the new wells drilled at the site, which it called "not considered to be an adequate method of evaluation in this case."

HVV also questioned proposed mitigation solutions to the lack of recovery at the private wells, noting that it “does not agree that additional analysis was performed that demonstrates that the aquifer can accommodate the sustained target pumping rate of 32 gpm.”

Two of the proposed mitigation solutions include the developer paying to deepen the nearby private wells or essentially bring those wells into the development’s water supply system to solve the recovery issue. However, mitigation isn’t mentioned for additional nearby property owners if they experience similar recovery challenges with their own wells as a result of the development. If their wells are also negatively impacted by the development’s water usage, will the developer also cover the cost of that mitigation? Or the town?

Further, I’m confused by what appears to be an incomplete Part 2 of the Environmental Assessment Form, which identifies project impacts. In Section 4: Impact on Groundwater, you acknowledge that the development “may result in new or additional use of groundwater, or may have the potential to introduce contaminants to groundwater or an aquifer.”

However, additional questions in that section are left blank, including:

- Water supply demand from the proposed action may exceed safe and sustainable withdrawal capacity rate of the local supply or aquifer.
 - *HVV’s review of the developer’s water report disagrees, noting “the withdrawal rate of 32 gpm at wells 4 and 5 may be too high relative to the available groundwater recharge in the aquifer.”*
- The proposed action may include or require wastewater discharged to groundwater.
 - *Part 3 of the Board’s Environment Assessment Form narrative states “The Proposed Action includes a new wastewater treatment plant with discharge into an unnamed stream.”*

All of the above seems like it would require a positive SEQRA declaration and full Environmental Impact Statement. I respectfully urge you to vote no on tonight’s negative SEQRA declaration. Taking that action wouldn’t be anti-business. It’s pro Cairo. Please consider a positive SEQRA declaration and Environmental Impact Statement to protect our community’s present and future.

Thank you,
Jack Weinstein