



1786 Kings Highway • Chester, NY 10918

The Chester Conservation Advisory Council (CAC) submits these images and information regarding the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE) Notice of Activity in a 100-Year Floodplain for the proposed purchase, occupation, and rehabilitation of the warehouse at 29 Elizabeth Drive, Chester, New York 10918



Recommendations

The Chester Conservation Advisory Council (CAC) is urging the Department of Homeland Security (DHS) and Immigration and Customs Enforcement (ICE) to conduct a full, climate-informed flood-risk analysis and local groundwater extraction infrastructure + economic impact assessment before moving forward with the proposed federal facility at **29 Elizabeth Drive**, located in the Chester industrial park.





Concern

The Village of Chester's wastewater system is operating at or above its permitted capacity. Village of Chester water supply is sourced groundwater and draw from Walton Lake. It is part of a network of shared agreements for access. A federal facility with continuous staffing and potential detention-related occupancy would introduce:

1. Significant new wastewater loads
2. Sanitation, laundry, and food-service flows
3. Medical and hygiene wastewater

Local infrastructure cannot absorb these loads without upgrades, cost-sharing agreements, or new capital investment.

Concern

The site sits directly within a FEMA-designated Regulatory Floodway and 100-year floodplain, the highest-risk flood zones recognized by federal law. The CAC warns that ICE's current analysis relies on outdated 2009 flood maps and does not incorporate modern climate science, updated rainfall projections, or federal best practices under the Federal Flood Risk Management Standard (FFRMS).



Concern

Fiscal and Operational Risk to Chester

If the project proceeds without infrastructure upgrades:

Local taxpayers may bear the cost of sewer and water improvements

Emergency-response obligations will increase

Roadway maintenance costs may rise due to increased heavy-vehicle traffic

Without mitigation measures for proposed/likely paved, impervious ground treatments, flood-related disruptions may impair industrial-park commerce



Location Issues

The industrial park surrounding 29 Elizabeth Drive is heavily used by freight carriers and local businesses. The CAC notes that ICE has not analyzed roadway flooding, truck-traffic safety, and interruptions to emergency-response time traversing or bypassing what would become a federalized security area.





Actions Needed

Conduct a **comprehensive analysis of fiscal impacts**, including potential reductions in tax revenue due to loss of private ownership and related local tax obligations

Conduct **climate-informed flood modeling** consistent with FFRMS.

Perform **2D hydraulic modeling** of access roads and truck-traffic routes.

Provide a **transparent alternatives analysis**.

Evaluate **sewer-capacity constraints** and wastewater-treatment impacts.

Analyze **potable-water supply, pressure, and quality requirements** for a detention-related facility.

Assess **public-health and sanitation requirements** for human occupancy.

Engage directly with **local officials, emergency services, businesses, and truck-driver representatives**.

CAC is not taking a position on federal operations.

The CAC is asking for responsible siting and honest analysis. The community deserves a full accounting of the risks to safety, health, and the local economy and clear, functional plans to mitigate those risks before any final decision is made.