



1786 Kings Highway • Chester, NY 10918

**Summary of Public Comments submitted by Chester Conservation Advisory Council to Department of Homeland Security (DHS), 01/16/2026 concerning proposed Homeland Security Detention Center, Chester, NY**

**The proposed DHS/ICE facility at 29 Elizabeth Drive, Chester, NY, 10918** is located within both a Regulatory Floodway and the 100 year floodplain, making it one of the highest risk locations for flooding in Orange County.

**ICE's analysis relies on outdated 2009 flood maps and does not incorporate modern climate science, updated rainfall projections, or federal best practices under the Federal Flood Risk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).**

### **Major Issues Identified**

- Outdated flood data used to justify siting
- No climate informed modeling despite rapidly increasing Hudson Valley flood risk
- No analysis of truck traffic safety or industrial park road flooding
- No evaluation of emergency access/egress
- Insufficient alternatives analysis under EO 11988
- No cumulative impact assessment on local infrastructure or emergency services

### **What We Request**

- Financial impact analysis for both Village of Chester and Town of Chester
- Climate informed flood modeling
- 2D roadway flood modeling
- Transparent alternatives analysis
- Engagement with local officials, CAC, and industrial park businesses
- Reconsideration of siting in a regulatory floodway
- This project requires a substantially expanded analysis before any final decision is made.

**For More Information Contact:**  
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