Although I am very interested in increasing access to affordable housing and reasonably priced groceries in our town, I am skeptical of this particular proposal for a range of reasons. It seems unwise to overlook health concerns about the long-term safety of our groundwater. There seem to be no substantial guarantees that this grocery store will be affordable for the majority of the town it purports to serve. Lastly, the “affordable” housing is based on area median income which year after year is increasingly skewed by second-home owners and remote workers earning incomes hundreds of miles away from here. The apartments could be much more affordable in the long term if they were based on a percentage of the tenant’s income. Most importantly, it seems like the proposal does not match the structural limitations of the footprint of the land. A scaled-down project with ten or so apartments and a building that fits into the constraints of the lot would be a wiser choice and one that perhaps the state could be persuaded to fund if more was done on the part of the applicant to advocate for solutions that actually fit rural communities like this one.

I don’t think it makes sense to ignore the extreme physical and environmental limitations of jamming a massive 41-unit apartment complex and a 12,500-square-foot grocery store onto a tight 3.2-acre parcel situated on rural wetlands. The sheer density of this overbuilt footprint is exactly why the developers are cornered into asking the New York State Department of Health for an unprecedented, dangerous waiver to bypass the mandatory 200-foot protective buffer between their massive on-site septic system and our public drinking water supply. To make this cramped layout function on paper, the proposal relies on engineered tertiary treatment tech—specifically an advanced ultraviolet (UV) disinfection septic loop. These high-maintenance, mechanical systems are relatively new to decentralized rural developments and completely lack a deep pool of long-term, multi-decade performance data under severe climate stress.

Furthermore, the official Town Design Engineer (TDE) Review Letter explicitly reveals that Josh Young’s emergency power backup plans are dangerously inadequate. The town's engineering review notes that the submitted materials fail to clearly identify emergency power provisions, lack redundancy measures, and completely fail to demonstrate that the proposed generator has been properly sized. As rural residents, we know that traditional septic systems fail under pressure—but mechanical UV systems introduce an entirely different layer of risk. They are completely dependent on a continuous, uninterrupted supply of electricity to power the UV lamps, electronic telemetry controls, and motorized effluent pumps.

When our rural grid inevitably goes out during severe storms, this overbuilt complex faces catastrophic operational vulnerabilities. The developer has provided no engineering calculations to prove a single generator can handle the massive,

concurrent electricity load required to run 41 apartments, a commercial grocery store's massive refrigeration units, and the UV wastewater disinfection system simultaneously. If the backup generator fails to engage flawlessly, runs out of fuel during a prolonged outage, or lacks mechanical redundancy, the UV treatment mechanism stops dead instantly. Raw, undisinfected wastewater would immediately overwhelm the filtration array, leading to backups or catastrophic leaching directly adjacent to our town's water supply. In an era of intensifying environmental extremes, we simply do not have the margin for error to gamble public health on unproven operational technology and half-baked generator plans just to accommodate a developer's inflated profit margins. Yes, New Lebanon desperately needs housing, but we need safe, structurally resilient housing designed to protect our people for generations, not an over-engineered risk waiting to fail.

I am not persuaded by the argument that a larger footprint grocery store will pave the way for a considerable drop in grocery store prices. I can find many local examples of expensive grocery stores in the area that are at a similar scale to this proposal. Guidos comes to mind. I can also think of several grocery stores that are truly dedicated to progressive affordable models of care: the Honest Weight Food Co-op in Albany, the Rolling Grocer in Troy, or Tri Corner FEED in Millerton. These models demonstrate that scale does not dictate affordability—mission does.

Although I wholeheartedly agree that we need more affordable housing in our community, the Tilden Commons proposal merely addresses the symptoms of our housing crisis while accelerating its root causes. By relying on gig-economy labor and treating housing as a transient commodity, it feeds directly into the modern precarity of the working class. We need protections for those struggling to stay in the homes they grew up in. We need progressive tax codes that benefit year-round primary homeowners and local employees. A community is built in one place.

True housing security requires an entirely different model: one anchored in community stewardship rather than speculative development. We should look to models like the Berkshire Community Land Trust, whose "Farmsteads for Farmers" campaign demonstrates how removing land from the speculative market guarantees permanent, generational affordability. This approach directly mirrors the philosophies outlined in E.F. Schumacher's *Small Is Beautiful: Economics as if People Mattered*, which reminds us that economic structures are only sustainable when they are scaled to human life and local ecosystems. Schumacher's warning against infinite growth on a finite planet perfectly captures the danger of overloading a 3.2-acre parcel with overbuilt commercial infrastructure.

Instead of building massive plazas that distort local market dynamics, New Lebanon must use targeted municipal regulations to address our inflation problem directly at the source: predatory real estate financialization and out-of-town second-home

owners. We do not have to look far for evidence of this crisis. Just look at 126 Temple Road. Purchased in April 2026 for $855,000 by a shielded, private LLC, this single-family home was immediately flipped into a luxury summer vacation rental priced at an astronomical $22,000 per month.

This is the exact behavior that fuels a permanent renter-class and corporate-owner-class dynamic, driving local displacement. When outside capital treats our neighborhoods like high-yield stock portfolios, working-class locals are entirely locked out of building equity. They are forced to compete for a shrinking supply of properties with wealthy investors who can absorb inflated acquisition costs because they expect to extract hyper-inflated, short-term rental yields. This dynamic funnels local wealth outward, turns New Lebanon into a hollowed-out playground for part-time visitors, and polarizes our civic life into a visible divide between transient wealth and housing-insecure locals. Political polarization thrives in this environment because working class people's needs are betrayed in favor of profit and development.

New Lebanon has the legal authority to stop this, and we must look to other New York towns that have already successfully enacted regulations to halt short-term rental inflation. Towns like Gardiner, Woodstock, and Hudson have implemented strict residency requirements, capped the total number of non-owner-occupied short-term rental permits, or established de facto bans on corporate investor-owned properties. Several neighboring towns have modernized their local housing laws to protect long-term residents and encourage multigenerational living. We can do the same here in New Lebanon.

We must implement these exact, aggressive zoning tools to disincentivize predatory investment and protect our housing market from runaway inflation. Greenlighting overbuilt, speculative market developments like Tilden Plaza will not save us; it will only codify the very systems of inequality and displacement currently tearing at the fabric of our rural community.

Sincerely,

Katherine Taylor