
FINAL ENVIRONMENTAL IMPACT STATEMENT

Letchworth Road Residential Development

**LETCHWORTH ROAD
TOWN OF HAVERSTRAW
ROCKLAND COUNTY, NY**

*Prepared
for:*

Haverstraw Group LLC
16 Microlab Road, Suite A
Livingston, NJ 07039
Contact: Mr. Marc Pantirer

*Lead
Agency:*

Town of Haverstraw Planning Board

Prepared by:



Project 21090

Date:

August 15, 2025

Revised:

March 31, 2026

May 15, 2026

Letchworth Road Residential Development

**Letchworth Road
Town of Haverstraw
Rockland County, NY
Tax Map ID 19.11-1-1**

FINAL ENVIRONMENTAL IMPACT STATEMENT

State Environmental Quality Review Act (SEQRA)

Lead Agency:

Town of Haverstraw Planning Board
1 Rosman Road
Garnerville, NY 10923
Contact: Mr. Salvatore Corallo Planning Board Chairman
Telephone: (845) 429-2200

Applicant/Owner:

Haverstraw Group LLC
16 Microlab Road, Suite A
Livingston, NJ 07039
Contact: Mr. Marc Pantirer
Telephone: (973) 488-6402

Date Submitted:

Revised:

Date Accepted:

Preliminary Site Plan Drawings, which include:

<u>Dwg. No.</u>	<u>Title</u>
C-000	“Cover Sheet”
C-010	“Existing Conditions Map”
C-100	“Site Layout Plan”
C-200	“Site Grading Plan”
C-220	“Cross Sections”
C-300	“Site Utilities Plan”
C-400	“Overall Construction Phasing Plan”
C-401	“Site Erosion & Sediment Control Plan - Phase 1A”
C-402	“Site Erosion & Sediment Control Plan - Phase 1B”
C-403	“Site Erosion & Sediment Control Plan - Phase 2”
C-404	“Site Erosion & Sediment Control Plan - Phase 3”
C-900	“Construction Details”
C-901	“Construction Details”
C-902	“Construction Details”
C-903	“Construction Details”
C-904	“Construction Details”
L-100	“Overall Landscape Plan”
L-110	“Typical Unit Landscape Plan”

III. RESPONSE TO COMMENTS	III-1
A. Introduction	III-1
B. Comment Key	III-1
III.C.1A Comments Regarding DEIS Executive Summary	III.C.1A-1
III.C.1B Comments Regarding DEIS Project Description	III.C.1B-1
III.C.2 Land Use and Zoning	III.C.2-1
III.C.3 Visual Resources and Community Character	III.C.3-1
III.C.4 Soils, Topography and Steep Slopes	III.C.4-1
III.C.5 Flora and Fauna	III.C.5-1
III.C.6 Stormwater Management	III.C.6-1
III.C.7 Water Supply and Sanitary Sewerage	III.C.7-1
III.C.8 Other Utilities and Services	III.C.8-1
III.C.9 Traffic Transportation and Parking	III.C.9-1
III.C.10 Community Demographics, Facilities and Services	III.C.10-1
III.C.11 Fiscal and Economic Conditions	III.C.11-1
III.C.12 Noise and Air Quality	III.C.12-1
III.C.13 Historic and Cultural Resources	III.C.13-1
III.C.14 Construction	III.C.14-1
III.C.15 Significant Adverse Environmental Impacts that Cannot be Avoided	III.C.15-1
III.C.16 Alternatives	III.C.16-1
III.C.17 Irreversible and Irretrievable Commitment of Resources	III.C.17-1
III.C.18 Growth Inducing Aspects	III.C.18-1
III.C.19 Effects on the Use and Conservation of Energy Resources	III.C.19-1

Appendices

- A. Correspondence
- B. Stormwater Pollution Prevention Plan (SWPPP), last revised 08/15/2025
- C. JMC Site Plan Drawings

Preliminary Site Plan Drawings, which include:

<u>Dwg. No.</u>	<u>Title</u>
C-000	“Cover Sheet”
C-010	“Existing Conditions Map”
C-100	“Site Layout Plan”
C-200	“Site Grading Plan”
C-220	“Cross Sections”
C-300	“Site Utilities Plan”
C-400	“Overall Construction Phasing Plan”
C-401	“Site Erosion & Sediment Control Plan - Phase 1A”
C-402	“Site Erosion & Sediment Control Plan - Phase 1B”
C-403	“Site Erosion & Sediment Control Plan - Phase 2”
C-404	“Site Erosion & Sediment Control Plan - Phase 3”
C-900	“Construction Details”
C-901	“Construction Details”
C-902	“Construction Details”
C-903	“Construction Details”
C-904	“Construction Details”
L-100	“Overall Landscape Plan”
L-110	“Typical Unit Landscape Plan”

List of Figures

<u>Number</u>	<u>Title</u>	<u>Following Page</u>
01	Alternative Subdivision Plan "Existing Letchworth Property"	III.C.2-10
02	Visibility Assessment	III.C.3-3
03	School Bus Turning Analysis	III.C.9-17
04	Conventional Subdivision Plan "Proposed Action Site"	III.C.9-17

List of Tables

I-1	Reviews and Approvals
II-1	Reviews and Approvals
III.C.9-1	Development Volume Comparison
III.C.11-1	Original Pilot Proposal

I. PROJECT DESCRIPTION

A. Introduction

This Final Environmental Impact Statement (FEIS) has been prepared pursuant to SEQRA (Article 8 of Environmental Conservation Law) and its implementing regulations (6 NYCRR Part 617). Pursuant to 6 NYCRR Part 617 (specifically §617.9(b)(8)), the purpose of this FEIS is to provide Lead Agency responses to the substantive public comments (both written and verbal) made on the Draft Environmental Impact Statement (DEIS) during the public hearings and formal comment period. As such, this FEIS addresses all substantive comments made on the DEIS during the public comment period and will serve as a basis for making environmental findings for the project described below. Those comments are summarized and responded to in Chapter 3, “Response to Comments.”

B. Site Location/Environmental Setting

The subject property is a portion of the Letchworth Village Property in the Town of Haverstraw. Tax Lot 19.16-1-14 NY is a large tract (154.6 acres) bordered by Willow Grove Road and a residential development to the North, Letchworth Village Road to the West and South, and New York State owned land to the East. This Tax Lot includes many of the remaining buildings of the former Letchworth Village Development Center, including those along East Stewart Circle and West Stewart Circle.

The property to be developed (hereinafter referred to as the “Project Site”) consists of ±23.86 acres of vacant and underutilized land on the east side of the tax lot. The Project Site formerly contained a single-family home however the home was previously removed. The site currently contains a driveway, remains of the former home’s foundation, a garage, a shed, walls, wooded areas and an open recreational field.

The Project Site sits at a high point, with the terrain rising from the west to a centrally located high point. The terrain then slopes downward to the east toward the State lands and Hammond Road. There are no wetlands, watercourses, or water bodies located on the Project Site.

Small portions of the Project Site contain slopes in excess of 15% and approximately 51% of the Project Site contains wooded areas.

C. DEIS Plan

The DEIS Proposed Action (“the DEIS Plan”) proposes the project (hereinafter the “Proposed Action”) consists of seven (7) multifamily apartment buildings constructed in accordance with the Type V-A (Protected Wood Frame) construction type standards over one level of garage parking. The buildings will each contain a trash collection room, mail / package room, and storage. Each unit will have its own washer and dryer.

Five (5) buildings (Type A) will have 41 dwelling units (5 one-bedroom units, 36 two-bedroom units) with 18 individual garages for rent at the basement level. Two (2) buildings designated Type B will have 48 dwelling units (14 one-bedroom units, 34 two-bedroom units) with 21 individual garages for rent at the basement level. Type A buildings are proposed to have a building envelope of approximately $\pm 20,540$ square feet and Type B buildings are proposed to have a building envelope of approximately $\pm 22,752$ square feet. The buildings will provide a total of 300 rental apartments consisting of 52 one-bedroom apartments and 248 two-bedroom apartments with an additional unit to be utilized as a model unit. On-grade, uncovered parking is provided adjacent to the buildings.

The Proposed Action also includes the construction of a clubhouse and recreation areas which will provide amenities for the residents. The clubhouse is approximately 10,625 $\pm$ S.F. and will contain a leasing office, clubroom, fitness

center, yoga studio, lounge, demonstration kitchen, and restrooms. The area outside of the clubhouse will contain a patio and pool for residents. The recreation areas on-site will consist of a tennis court and pickleball courts for the residents.

The architectural character of the buildings is traditional residential with horizontal lap siding, stone veneer, fiber cement trim, cast stone lintels, decorative shutters, and asphalt shingles.

The design of these buildings will meet all adopted energy codes for the state of New York. High-efficiency gas fired MagicPak systems will provide heating and cooling and will be installed in each apartment. Apartment units range in size from approximately 800 square feet for a one-bedroom to approximately 1,500 square feet for a two-bedroom apartment. All paints, primers, and adhesives used will be low Volatile Organic Compounds (VOCs). Exterior gas fired fire pits and grills will be installed for residents use in the clubhouse area but no wood gas or ethanol fireplaces will be included in the Proposed Action.

Fire and life safety will be addressed through the installation of sprinkler systems throughout the buildings. All systems will meet the requirements of the National Fire Protection Association 13 (NFPA 13) guidelines for installation and operation. All building and stair entries will be access controlled for resident safety and the leasing center will be staffed during business hours.

1. Residential Component

The Proposed Action consists of the development of three-hundred (300) multifamily residential rental units within seven (7) a 3.5-story buildings. The buildings are 3 stories from the front side, and 4 stories from the back side, which contains a level of individual garages which will be available for rent by residents in the building. Five (5) buildings (Type A) will have 41 dwelling units (5 one-bedroom units, 36 two-bedroom units) with 18 individual garages for

rent at the basement level. Two (2) buildings designated Type B will have 48 dwelling units (14 one-bedroom units, 34 two-bedroom units) with 21 individual garages for rent at the basement level. One unit will be utilized as a model unit for marketing purposes. On-grade, uncovered parking is provided adjacent to the buildings.

2. Residential Amenities Component

The Proposed Action also includes the construction of a clubhouse and recreation areas which will provide amenities for the residents. The clubhouse is approximately 10,625± S.F. and will contain a leasing office, clubroom, fitness center, yoga studio, lounge, demonstration kitchen, and restrooms. The area outside of the clubhouse will contain a patio and pool for residents.

Recreation areas will be created on-site and will consist of pickleball courts dog run, and other amenities for the residents.

Each building will contain a mail / package room, and each unit will have a washer and dryer within the unit.

3. Green Design and Sustainability Components

The Proposed Action will be built with LED light fixtures, low flow water fixtures, programmable thermostats, low VOC paints, and other modern sustainable features.

4. Site Roadways, Access and Circulation

The Project Site is bounded by Letchworth Village Road to the South and Ridge Road to the West. Access to the Proposed Action is proposed by a single boulevard style driveway which will connect to a small roundabout within Ridge Road as depicted on JMC Drawing C-100, "Site Layout Plan".

The proposed driveway provides a single entering lane and single exiting lane separated by a landscaped median. An on-site roundabout with three approaches is proposed within Ridge Road to provide access to the Proposed Action, the existing church, as well as any future development that may occur at the Letchworth Village property. In addition, an emergency access drive is proposed which will connect directly to Letchworth Village Road and only be utilized by emergency services personnel during emergencies.

The proposed main driveway connects to a network of access driveways within the site that lead to the proposed buildings. The main boulevard continues east through the center of the site to a T intersection where the clubhouse is located. From there, residents can turn left or right to access the front side of all proposed buildings. In addition, there is a perimeter access drive which provides access to the rear of each building which contains the garages and additional parking spaces behind the buildings. A total of 662 parking spaces are provided, which includes 368 standard parking spaces, 30 ADA compliant accessible parking spaces, 132 garage parking spaces, and 132 garage apron parking spaces.

5. Tree Preservation, Landscaping, and Buffers

Existing trees on the Project Site will be preserved to the greatest extent possible. The placement and orientation of the proposed buildings focuses the development in the center of the site and reduces the area of site disturbance and to preserve large areas of perimeter buffer. The grading limits of disturbance along the southern side of the development allows the preservation of a large wooded buffer adjacent to Letchworth Village Road.

In addition, a detailed landscaping plan has been prepared for the project which identifies proposed foundation plantings, parking lot plantings, and perimeter

plantings. Please refer to the JMC Drawing L-100 “Site Landscaping Plan” which depicts the various proposed plantings throughout the Project Site.

6. Recreation and Open Space

The Proposed Action will provide approximately 6,500 linear feet of sidewalks within the site that connect the various buildings to each other and to the clubhouse. The clubhouse is approximately 10,625± S.F. and will contain a leasing office, clubroom, fitness center, yoga studio, lounge, demonstration kitchen, and restrooms. The area outside of the clubhouse will contain a 6,000± S.F. patio in addition to an 8,000± S.F. patio / pool area for residents. In addition, these sidewalks will connect to an approximately 11,500± S.F. recreation area that includes a dog run and two pickleball courts.

7. Utilities and Support Facilities

Existing utilities in the vicinity of the Project Site include water service provided by Veolia Water, sanitary sewer service provided by the Joint Regional Sewerage Board, and electric and gas service provided by Orange and Rockland Utilities. There are overhead wires that exist along the northern side of Letchworth Village Road. (Electric service within the development will be undergrounded.) In addition, there is a natural gas main that runs within Letchworth Village Road.

a. Sanitary Sewer

An existing 12” sanitary sewer main exists at the intersection of Letchworth Village Road and the driveway for the former Letchworth Village power plant. This main carries flows south parallel to the Minisceongo River through the Philip J. Rotella Municipal Golf Course. These flows are ultimately conveyed to the treatment plant located on Ecology Road in

West Haverstraw. The sewer infrastructure is owned and maintained by the Joint Regional Sewerage Board.

An additional existing sanitary sewer line in the vicinity of the intersection of Theills-Mt. Ivy Road and Letchworth Village Road to the southeast of the site. These flows additionally are ultimately conveyed to the treatment plant located on Ecology Road in West Haverstraw. We are currently coordinating with the Joint Regional Sewerage Board to determine which connection point would be pursued, and analyses of the mains have been provided for their review.

The applicant received a willingness to serve letter from the JRSB on March 6th, 2026.

b. Water

An existing 12" water main is located within Letchworth Village Road. Veolia Water owns and maintains the water infrastructure within this service area. The locations of the existing water main are depicted on the JMC full size drawings located in Appendix C.

c. Electric, Natural Gas, Telephone, Cable

Electric, natural gas, telephone and cable services exist in the vicinity of the Project Site. Electric and natural gas utilities are provided by Orange and Rockland Utilities. The Proposed Action will utilize natural gas for heat, hot water and cooking. High-speed internet access is provided by Optimum and Verizon in this service area.

8. Site Excavation, Grading, and Fill Plans

The layout of the proposed buildings and the site was designed to minimize land disturbance and work with the existing terrain to the maximum extent possible. The proposed buildings and roadways are oriented with the natural terrain and the grading design mimics the existing grade so as to minimize overall earthwork and disturbance.

The intent of the site grading is to achieve a balanced design with no significant quantities of either export or import of material. The total amount of exported material required for the Project Site's current site plan is about $\pm 62,570$ cubic yards. The total amount of imported material required is about $\pm 96,470$ cubic yards. This results in a net import of approximately $\pm 33,900$ cubic yards of material, which is ideal because of the subgrade aggregates required (i.e. sand, gravel & concrete) to implement the Proposed Action. Accordingly, the earthwork is substantially balanced when one considers the excavation required to bring the site to the subgrade of the roads and buildings.

9. Stormwater Management Summary

A Stormwater Pollution Prevention Plan (SWPPP) has been prepared for the Proposed Action. The development has been designed in accordance with the following:

- Requirements of the New York State Department of Environmental Conservation (NYSDEC) SPDES General Permit No. GP-0-25-001, effective January 25, 2025.
- Chapter 137, Part 3, "Stormwater Management" of the Town of Haverstraw Code.

As per the above requirements of the NYSDEC and the Town, the proposed stormwater management facilities have been designed such that the quantity

and quality of stormwater runoff during and after construction are not adversely altered, and in some instances are enhanced in comparison to pre-development conditions. The proposed stormwater improvements will result in reductions in peak rates of runoff from existing conditions for all storms and analyzed, resulting in no impacts to off-site properties.

The Applicant is proposing several stormwater practices to mitigate stormwater runoff from the proposed improvements. Stormwater runoff will be collected and conveyed through a series of drain inlets and underground pipes to multiple stormwater management areas, including bioretention areas, infiltration basins, and detention basins. In addition, there will be multiple structures known as hydrodynamic separators which will provide water quality pretreatment for stormwater runoff before entering each green practice. These practices will work in conjunction to reduce flows exiting the Project Site as required by the Town of Haverstraw and the NYSDEC, and will result in reductions in peak rates for all storms analyzed, resulting in no adverse impacts to off-site properties.

10. Construction Staging Summary

The construction of the project will be completed in a single phase, and will be sequenced in an efficient way to limit the potential impacts associated with construction. The Project Site will be fully closed in with temporary fences for safety and to prevent anything or anyone from entering the property. Silt fences will also run along the entire Project Site to mitigate off-site environmental impacts.

A construction entrance will be located via Letchworth Village Road, in the same location as the future entrance for the Project Site. Dumpsters will be provided in accordance with changing site conditions. The construction trailer will be placed in the vicinity of the of the construction entrance. Traffic signage

will be provided to provide adequate notice to drivers for the entrances to the Project Site and to keep safety a top priority. Additionally, traffic control plans will be prepared as required during the applicable County permitting process. It is also noted that construction vehicles will not drive on the Church parking lot nor the Church's property. Also, surface parking charging stations will be provided with each private garage having a charging outlet.

A general construction sequence is provided below outlining the general order of operations for the project construction:

1. Demolition of existing buildings and site features as required.
2. Installation of sediment and erosion control measures as indicated on the site plans.
3. Clear undeveloped portion of property which is to be developed.
4. Strip and stockpile topsoil.
5. Begin driveway, building and parking lot construction, rough grading.
6. Install storm drain system complete (immediately install inlet protection on all inlets).
7. Install utilities (gas, electric and telephone) as required.
8. Install concrete and asphalt concrete pavement complete.
9. Finish grading, redistribute topsoil and establish vegetation and/or landscaping.
10. Clean pavements and storm drain system of all accumulated sediment in conjunction with the removal of all temporary sediment and erosion control devices.
11. Complete site and building construction.

D. Description of the FEIS Alternative Plan

The Applicant still strongly believes that the Proposed Action presented in the DEIS Plan is the best project for the Town. The FEIS Alternative Plan ("FEIS

Alternative Plan”) was developed in large part due to comments and input received from the Lead Agency and the public during the review of the DEIS. The FEIS Alternative Plan utilizes the existing zoning and proposes a 7 single family lot subdivision of the existing ±23.86 acre site. In addition, a second site plan alternative was submitted under the DEIS or single family residence on the entire existing 154.5 acre Letchworth Village Site.

This FEIS is organized into three chapters:

- Chapter I., “Project Description,” describes and states that the site plan from the DEIS will remain the site plan for the FEIS.
- Chapter II., “FEIS Executive Summary,” describes any changes made to the site plan from the DEIS.
- Chapter III., “Response to Comments,” responds to substantive comments received on the DEIS and is organized by sub-chapter according to the structure of the chapters and analysis within the DEIS. Copies of all comments, including the public hearing transcripts, are provided in the appendices to the FEIS. The Comment Key, contained in Appendix A, identifies each correspondence received which contains substantive comments as an individual appendix, and where the comment and its response may be found in the FEIS.

The Applicant believes that the responses to comments on the site plan are responsive to substantive comments made during the public review period, and provides more clarity that the site plan will not require further potential significant environmental impacts.

E. Review Procedures and Process Background

On August 14th, 2024, the Planning Board declared their intention to be Lead

Agency, and on March 12th, 2025, the Planning Board declared themselves Lead Agency and issued a Positive Declaration declaring that a Draft Environmental Impact Statement be prepared. The Public Hearing on the Draft Scoping Document was held, and the Planning Board adopted the Final Scope on September 11th, 2024.

The Applicant prepared a DEIS which was submitted in sections to the Town of Haverstraw Town Clerk's Office, who in turn submitted sections to the Town's Planning Consultant, Kauker & Kauker, LLC, starting on January 29th, 2025, for purposes of completeness review. The Applicant received written completeness comments from the Town Clerk's Office Department on May 1, 2025.

The Applicant submitted a full DEIS to the Planning Board on January 29th, 2025. The Planning Consultant advised the Town Board on the sufficiency of the document for purposes of commencing public review. The DEIS was accepted as complete by the Planning Board on March 12, 2025 and scheduled the public hearing.

Prior to the Public Hearings on the DEIS, the Applicant met with the Town of Haverstraw Planning Board, Town of Haverstraw Architectural Review Board, Town Consulting Planner, District Fire Chief, as well as the North Rockland Central School District, the Regional Joint Veolia Water, in order to obtain these entities' input on the DEIS Plan.

Public Hearings on the DEIS were held on April 9, 2025 and the Hearing was closed on said date. Written comments were accepted until April 30th, 2025.

The DEIS is hereby incorporated by reference into this FEIS. Any terms relating to the description of the proposed project described in the DEIS are also used within this FEIS.

Pursuant to SEQR regulations, the Planning Board is required to adopt an Environmental Findings Statement based on the environmental review record before it or any other Involved Agency in the SEQRA review may take action on the project.

This FEIS fully anticipates all permitting and/or entitlements required for the project, including, but not limited to, the Applicant's application for a zoning text change, Special Exception Use Approval, Site Plan Approval, a local Wetlands/Watercourse Permit, and a Floodplain Development Permit for the proposed project. Accordingly, this FEIS and related environmental findings will be applicable to the below noted approvals.

The FEIS includes responses to comments received regarding the DEIS as well as any changes to the proposed project that reflect comments made during the public review period.

F. Required Approvals

The list of involved and interested agencies, required permits and approvals, and interested parties is provided below.

Table I-1
Reviews and Approvals

Agency	Approval/Review
1. Town of Haverstraw Planning Board	• SEQRA Determination (§200-3)(*) • Site Plan Approval
2. Town of Haverstraw Town Board	• Rezoning approval (R-120 to LA-17) • Amendment of LA-17 Zone Height
3. Town of Haverstraw Building Department	• Building Permit
4. Town of Haverstraw Department of Public Works	• Department of Public Works Water & Sewer Approval
5. Joint Regional Sewerage Board	• Joint Regional Sewerage Board Approval
6. Veolia Water New York	• Veolia Water New York Approval
7. New York State Department of Environmental Conservation (NYSDEC)	• 2025 SPDES Permit
8. Rockland County Planning Board	• §239-m General Municipal Law Referral
9. New York State Department of Environmental Protection ("NYSDEC")	• SPDES General Permit GP-0-20-001 for Stormwater Discharges from Construction Activities
10. New York State Department of Transportation ("NYSDOT")	• Highway Work Permit

*Reference to the Town of Haverstraw Code Section

II. FEIS EXECUTIVE SUMMARY

This Chapter provides an assessment of potential environmental impacts related to the Site Plan and any changes and analyses conducted since the submission and acceptance of the DEIS. There are no proposed changes to the DEIS Plan, which was the plan that was the basis for the Applicant's project and rezoning request. This FEIS shall evaluate the DEIS Plan and the DEIS alternatives that were previously scoped and presented.

A. Land Use, Zoning and Public Policy

The proposed action site is located in the Town's R-120 Zone, "Rural Residence District". Under Town Code Chapter 167, multi-family residences are not a permitted use in this zoning district. The Proposed Action requires a zoning change by the Town Board for the Project to be a permitted use.

Therefore, the proposed action includes a zoning change to the LA-17 Zone "Luxury Apartment Multifamily Residential District" which allows multifamily residences at a density of no more than 17 units per acre. This zone change allows the site plan to conform with Town zoning.

The proposed action conforms with goals of the Town of Haverstraw Urban Renewal Plan from 2006, the 2000 Town of Haverstraw Master Plan of 2000, the 2011 Rockland County Comprehensive Plan, and the 2024 Rockland County Housing Needs Assessment by providing a different housing type and increasing economic activity in the Palisades Parkway corridor along with a needed rental apartment housing option within the Town of Haverstraw.

B. Visual Impacts

The Plan proposes seven 3.5 story residential apartment buildings with surface & garage parking spaces. A 10,625± sf clubhouse, pool area, and multi-sport courts for tennis & pickleball are also included in the design. The architectural character

of the building is a modern residential aesthetic that takes cues from the remaining Letchworth Village buildings.

Lighting & Landscaping will be in accordance with Town Code Section A173 entitled “Site Development Plans”, which will ensure that all requirements in the Proposed Action comply. All lighting will be dark-sky compliant, appropriately shielded to prevent light spillage onto adjoining properties. All lighting will utilize high-efficiency lamps (LED). The southern portion of the Project Site will be the only part of the project visible from a public roadway, specifically Letchworth Village Road. The site plan has no changes from a visual or aesthetic perspective.

C. Soils, Topography and Steep Slopes

SESI Consulting Engineers were retained by The Applicant to prepare a thorough subsurface study and investigation of the proposed ±23.86 acre project area. The plan remains the same for the DEIS.

In accordance with NYS requirements, additional testing was performed on the site in areas in which the plan proposes for the stormwater system. On June 25 & 26, additional sub-surface data was collected with 10 test pits and on July 7 and 8, additional soil testing was performed with 9 soil borings. The purpose of this additional testing was to confirm the sub-surface conditions for the design of the proposed stormwater management systems on the site plan.

Additionally, all disturbed areas will be stabilized with native ground covers during post construction operations.

D. Flora, Fauna and Habitat

The Project Site is currently underutilized, vacant land that has experienced various levels of neglect over the past several years and decades. As a former institutional use, the Project Site has gradually returned to a mix of forested and lawn/meadow

areas. Most recently, approximately 1/3 of the Project Site was utilized as natural turf for recreational sport fields. The remaining $\pm$ 2/3 of the Project Site contain a mix of forested and meadow areas.

As stated in the DEIS, the NYSDEC Environmental Resource Mapper, the Project Site does not contain any species of plant or animal that is listed by New York State as endangered or threatened, any areas identified as habitat for an endangered or threatened species, nor any species of plant or animal that is listed by New York State as rare, or as a species of special concern.

It is noted that the entire $\pm$ 23.86 acre site lies within the Significant Biodiversity Area, SBA, known as the "Hudson Highlands West". This SBA is composed of 801,972 acres, an area extending from Orange and Rockland counties in the state of New Jersey.

A small portion of the project site lies within the area for Migratory Fish along the Miniceango Creek. The creek itself is situated south of Letchworth Village Road and runs through the Town of Haverstraw and Village of West Haverstraw into the Hudson River. There are many different uses currently operating within the Miniceango Creek Migratory Fish area in the municipalities of Haverstraw & West Haverstraw, including single family homes, schools, industrial plants, and commercial use buildings. The portion of our site that is situated in the migratory fish area is where the proposed Stormwater Basin 2B is situated. The proposed action will have relatively insignificant impact on the Miniceango Creek Migratory Fish Area.

The proposed landscape plan provides planting species that are native to the Rockland County area. Best management practices are to be utilized and all existing trees that are to be removed from the site are to comply with the Town of Haverstraw Municipal Code.

E. Stormwater Management

A Stormwater Pollution Prevention Plan (SWPPP) has been prepared for the Proposed Action. The development has been designed in accordance with the following:

- Requirements of the New York State Department of Environmental Conservation (NYSDEC) SPDES General Permit No. GP-0-25-001, effective January 25, 2025.
- Chapter 137, Part 3, "Stormwater Management" of the Town of Haverstraw Code.
- Requirements of the SPDES General Permit 2024 stormwater Design Manual

Since submission and acceptance of the DEIS, the hydrologic model has been revised to update the rainfall distribution curve from the Type III storm distribution to a distribution curve based on rainfall data from the NRCC website. In revising the hydrologic model, the plans and report have been revised for consistency. Additionally, the drainage analysis has been revised to study 3 design points as requested by the Town Consulting Engineer. The analysis now studies pre- and post- conditions at these three locations to meet a zero net increase. Additionally, the relocation of the emergency discharges have been revised to be directed away from the state owned parcel.

F. Water Supply and Sanitary Sewerage

The Project Site is located within a water service area operated and maintained by Veolia New York Water. The property is located within the Haverstraw Joint Regional District which is overseen by the Joint Regional Sewerage Board in West Haverstraw. Will serve applications have been submitted to both agencies.

Since the DEIS, JMC Drawing C-300, "Site Utilities Plan", shows the location of the proposed hydrants which have been coordinated with the Fire District. As requested by Civil Design Works, LLC, on behalf of the Town of Haverstraw, the water and sewer system alignments have been revised accordingly and are detailed on JMC Drawing C-300, "Site Utilities Plan". Additionally, a stubbed connection will be provided for the existing church property to connect into the public water system in the future if they choose to do so.

G. Other Utilities and Services (Gas, Electric, Telecommunications)

The Project Site is served by existing electric, natural gas, telephone, and other telecommunications services in the vicinity. The electric and gas utilities are provided by Orange and Rockland Utilities. High-speed internet access for data, television, and telecommunications is provided by Optimum and Verizon in the vicinity of the Project Site and the service provider will be determined at a later date.

Additionally, as requested by Silverberg Zalantis, LLC, on behalf of the Town of Haverstraw, the proposed roundabout and utilities have been designed to provide connection locations for future developments.

Other than service connections to the Proposed Action, no modifications to the existing utilities are proposed to facilitate the Proposed Action and therefore do not require any mitigations.

H. Traffic, Transportation and Parking

An analysis of the surrounding roadway network under existing and future conditions with and without the proposed action was performed during the peak weekday morning, weekday school afternoon, weekday roadway evening, and Saturday midday hours. Based on intersection capacity analyses as well as accident analysis performed the applicant proposes the following improvements

within the study area:

- Letchworth Village Road and Storrs Road (Intersection 4) is proposed to be modified to an all-way stop-controlled intersection.
- Letchworth Village Road & Ridge Road (Intersection 5) is proposed to be realigned to remove the existing skew between intersection approaches. Additionally, “All-Way” signs are proposed to be added below the “Stop” signs to provide increased awareness of the all-way stop operations to motorists utilizing the intersection.
- US Route 202, Thiells-Mount Ivy Road, NYS Route 45, and Old County Road (Intersections 9 and 10) is proposed to provide traffic signal timing modifications during the hours of 2:00 PM to 7:00 PM on weekdays.
- US Route 202, NYS Route 45, and Old County Road (Intersection 10) is proposed to prohibit right turns on red for the northbound NYS Route 45 approach to the intersection with the installation of signage.
- Warning signage for deer is proposed along Thiells-Mount Ivy Road between Anderson Road and Rosman Road.

The project proposes to provide a total of 667 on-site parking spaces which are categorized into 399 general surface parking spaces, 134 reserved garage parking spaces, and 134 reserved tandem parking spaces in front of the garages.

Since the submission and acceptance of the DEIS, the site plan has been revised to show snow storage areas. Additionally, a bus stop with a shelter has been provided along the primary internal driveway.

As requested by LaBella, additional car counts will be conducted at intersections 5, 6, 12, and 13 at the completion of the construction in these areas. In addition, the site plan has been reviewed with Thiells Roseville Fire District. Pedestrian connectivity has been provided between the church property and the proposed development via additional sidewalk and marked pedestrian crossings.

I. Community Demographics, Facilities and Services

The Proposed Action will create 300-units of new, high-quality multi-family dwellings in the Town of Haverstraw that will provide a needed diversification of housing opportunities in the community. Additionally, the Letchworth Village Property has been extensively studied numerous times in the past for this type of redevelopment and would be a positive change for the area.

The Town services' budgets and personnel were previously provided in the DEIS. The DEIS states the current number of employees in the various service departments and was provided to us by these department chiefs (Police, Fire, and Ambulance Corp). In addition, we have been in communication with the Town's Director of Finance, who has stated that there will be no additional demand on these services. The project sponsor met with the Fire Chief and Assistant Chiefs of the Theills Roseville Fire District on March 5, 2025. The fire truck turning plan was discussed at that time. We then provided a revised Fire Truck Turning Plan for the Department's review to address their concerns and confirm it is to the Department's satisfaction.

The Fire District did not express a need for additional fire apparatus or equipment to serve the proposed action. The proposed action will be constructed in accordance with all applicable NFPA / NYS Fire Codes.

As stated, and discussed in the DEIS, the North Rockland CSD has seen a decline in enrollment by 3.6% over the last 10 years, based on the NYS ED data website. We've communicated with the school district and received the maximum enrollment capacities for each school building in the district and none of the schools are at or near their capacity limitations, as provided in the DEIS.

In addition, as requested by Silverberg Zalantis, LLC, on behalf of the Town of

Haverstraw, the project team reviewed the 2024 Rockland County Housing Needs Assessment. This assessment specifically states that this type of housing is needed throughout the County.

J. Fiscal and Economic Conditions

The Proposed Action is expected to generate \$11,745,000.00 in revenue for the Town during a fifteen-year PILOT program that has been agreed to between the Town and the Applicant in the contract of sale. This is in addition to the \$14,400,000.00 purchase price that will be provided directly to the Town of Haverstraw.

The Proposed Action is estimated to generate approximately 739 residents, which would create new municipal service costs totaling approximately $\pm \$616,215$. This service cost estimate is based on average costs, not marginal increases. The Proposed Action is also estimated to create an average increase of $\pm \$886,677.00$ in educational costs for the ± 33 school aged children. The actual marginal costs of educating these students will be much lower.

Additionally, on July 1, 2025, the project team had discussions with the Town Director of Finance. It was determined by the Town that the proposed action would not require additional financial resources to any of the Town service departments and districts.

K. Noise and Air Quality

The Noise Analysis reveals that no significant noise impact will occur as a result of the Proposed Project. Despite this, the Applicant has incorporated several mitigating measures.

To provide additional noise abatement, the Applicant will shut-down equipment when it is not in use (i.e. no idling of unused equipment in excess of State

regulations). To the extent practical, noisy equipment shall be kept far from site boundaries and the Applicant shall schedule noise producing operations concurrently to reduce long exposure to noticeable sound levels. In addition, the Proposed Action will conform to the construction time restrictions set forth in Town Code Section 167-40A(1), 7:00AM to 7:00PM on the weekdays and 8:00AM to 5:00PM on Saturdays. No construction operations are to take place on Sundays and Holidays.

It is acknowledged that all of Rockland County is a non-attainment area for 8-Hour Ozone. The traffic study submitted and reviewed by the Town proposes several improvements which will ensure adequate levels of service and reduce congestion, which mitigates any potential increase in ozone levels. In addition, the landscape plans submitted suggest native trees and shrubs to be incorporated into the site plans to address any potential impacts.

L. Historic and Cultural Resources

A consultation with the New York State Office of Parks, Recreation, and Historic Preservation (NYSOPRHP, also known as SHPO), via its Cultural Resources Information System (CRIS) was formally made on December 4th, 2024.

We received additional correspondence from the NYSOPRHP dated December 20th, 2024. Additionally, on July 9th, 2025, the project team made a submission to the NYSOPRHP based on the correspondence dated December 20th, 2024. Any and all follow-up correspondence from SHPO will be submitted to the Lead Agency for their record and review, including the final determination.

M. Construction information

All construction activities will be conducted in compliance with existing regulations, including local day and hour construction limitations. Consistent with Section 114-4B “Noise” of the Town Code, construction will only take place between the hours

of 8:00 am and 6:00 pm Monday through Friday as well as on Saturdays, Sundays, and holidays.

Since the DEIS, a construction phasing plan has been provided in the drawing set consisting of 4 phases, 1A, 1B, 2, & 3. Traffic control plans will be prepared as required during the applicable County permitting process. Additionally, during construction, there will be a security gate installed at the site entry which will be locked after hours. The job trailer, which is the office for the field team, will be located near the site entry within the gated area. A site safety plan will be provided by a third party site safety inspector and additional security measure will include cameras, lighting, and overnight monitoring.

These are all in addition to the other best management practices stated and discussed in the DEIS.

N. Summary of Project Alternatives

1. No Action (No Build) Alternative

The “No-Action” alternative would involve no development of the ±23.86 acre Site. This would result in leaving the Site in its existing vacant, undeveloped condition. This alternative does not meet the goals and objectives of the Applicant or the Town of Haverstraw and does not correlate with its reasonable investment objectives for the Project Site.

Under this alternative, the Project Site would most likely continue to decline and deteriorate in appearance while not providing any of the potential positive opportunities, including no future tax revenues and payment for acquisition, which the Proposed Action will present to the Town and Community.

2. Conventional Subdivision for a Single Family Residential Development

The “Conventional Subdivision” Alternative would involve development of the ±23.86-acre Project Site with seven single family residence lots and an associated right-of-way containing the proposed roadway to access the subdivision. The Conventional Subdivision Alternative would yield seven single family homes on lots that each exceed 120,000 square feet in area. This Alternative does not meet the goals and objectives of the Applicant from an economic and feasibility standpoint nor does it align with the objectives of the Town of Haverstraw.

Under this Alternative, the Project Site would be developed for residential use under the existing R-120 Zoning criteria. It would not provide the same level of potential benefits, which the Proposed Action will provide to the Town and Community.

In addition, a “Conventional Subdivision” Alternative was provided for the entire existing 154.5 acre Letchworth Village property, as requested by the Town of Haverstraw. Similarly to the seven lot subdivision alternative, the Project Site would be developed for residential use under the existing R-120 Zoning criteria. It would not provide the same level of potential benefits, which the Proposed Action will provide to the Town and Community.

O. List of Involved and Interested Agencies and Required Approvals/Permits

The list of required permits and approvals from involved and interested agencies is provided below in Table II-1.

Table II-1
Reviews and Approvals

Agency	Approval/Review
1. Town of Haverstraw Planning Board	• SEQRA Determination (§200-3)(*) • Site Plan Approval
2. Town of Haverstraw Town Board	• Rezoning approval (R-120 to LA-17) • Amendment of LA-17 Zone Height
3. Town of Haverstraw Building Department	• Building Permit
4. Town of Haverstraw Department of Public Works	• Department of Public Works Water & Sewer Approval
5. Joint Regional Sewerage Board	• Joint Regional Sewerage Board Approval
6. Veolia Water New York	• Veolia Water New York Approval
7. New York State Department of Environmental Conservation (NYSDEC)	• 2025 SPDES Permit
8. Rockland County Planning Board	• §239-m General Municipal Law Referral
9. New York State Department of Environmental Protection ("NYSDEC")	• SPDES General Permit GP-0-20-001 for Stormwater Discharges from Construction Activities
10. New York State Department of Transportation ("NYSDOT")	• Highway Work Permit

*Reference to the Town of Haverstraw Code Section

III. RESPONSE TO COMMENTS

A. Introduction

This Chapter of the Final Environmental Impact Statement (FEIS) addresses comments that were made on the DEIS that was accepted as complete and dated March 12, 2025. Comments were provided either verbally at the Public Hearings held on April 9, 2025 and provided in writing through April 30, 2025. This includes all comments made by the public, Rockland County Planning Board, the Town of Haverstraw and interested and involved agencies.

This chapter provides responses to the substantive verbal and written comments submitted on the DEIS. Full transcripts of public testimony and complete correspondence from which these comments are drawn are found in Appendix A, which lists the agencies, Town consultants, and individuals who commented on the DEIS. A total of 7 documents were received, reviewed and their substantive comments put into the FEIS. All these comments have been addressed in Section III of the FEIS.

B. Comment Key

A Comment Key is provided in Appendix A-8. This lists by commenter the type of correspondence received and the appendix in which the comment document is located. The comments are individually numbered by the section in the FEIS where the comment and its response may be found.

III.C.1A Comments Regarding DEIS Executive Summary

Comment No. 1A-1

The DEIS includes a general statement of project purpose and need but lacks a detailed analysis. Additionally, it references a comprehensive market analysis indicating that the proposed actions are driven by a basic imbalance in housing supply and demand. This statement should be expanded to provide further justification for the project, and the referenced market study should be included as an appendix to the document.

(Appendix A-1, Kauker & Kauker, LLC, DEIS Review Memorandum, Michael D. Kauker, PP, AICP)

Response No. 1A-1

The proposed action is driven by an imbalance of housing supply as referenced in both the Rockland County Comprehensive Plan of 2011 and the Rockland County Housing Needs Assessment of 2024.

The Rockland County Comprehensive Plan's Recommendation #9 is titled "Support the Reuse of Abandoned Railways." This is a recommendation to establish more housing and more housing types on specified properties in the County. Letchworth Village is emphasized as one of these properties in the document.

The 2024 Rockland County Housing Needs Assessment cites several goals in the "Summary of Needs" section of the document, including increased housing options that are affordable to very-low, low, moderate, and middle income households, as well as the need for new housing development to honor existing social networks with proximity to existing community assets, such as parks and

schools. Needs for increased production of more multifamily housing is also cited as a need for Rockland County.

The proposed action meets several goals and recommendations in both the Rockland County Comprehensive Plan of 2011 and the 2024 Rockland Housing Needs Assessment as well as the other Town and County documents and studies reviewed and referenced in the DEIS and FEIS.

Comment No. 1A-2

It is noted under Construction Information that "...construction will take place between the hours of 8:00 am and 6:00 pm Monday through Friday as well as on Saturdays, Sundays, and Holidays". However, under the Noise and Air Quality section it states that no construction operations will take place on Sundays or Holidays. It must be clarified if construction will occur on Sundays or Holidays, since conflicting information was provided.

(Appendix A-2, Rockland County Planning Department, DEIS Review Memorandum, Douglas J. Schuetz, Acting Commissioner of Planning)

Response No. 1A-2

So noted. Construction will occur during the hours permitted in Town Code Section 167-40. No work will be performed on Sundays or legal holidays as described in the code.

Comment No. 1A-3

Tables I-1 and II-2 should be expanded to include the Rockland County Drainage Agency as the Minisceongo Creek, a County regulated stream, is immediately adjacent to the parcel and this project may fall within the

jurisdiction of the Drainage Agency and permits may be required. Additionally, the Rockland County Highway Department should also be included in these tables as there are county roadways that are potentially impacted by this project including, Willow Grove Road (CR 98), Letchworth Village Road (CR 94), Thiells Mount Ivy Road (CR 47), Hammond Road (CR 47) and County highway permits may be required.

(Appendix A-2, Rockland County Planning Department, DEIS Review Memorandum, Douglas J. Schuetz, Acting Commissioner of Planning)

Response No. 1A-3

Tables I-1 and II-1 have been expanded and revised to include the Rockland County Drainage Agency.

Comment No. 1A-4

In addition, we recommend that an ‘Interested Agencies’ table be created that includes the Rockland County Planning Department, as the rezoning, and any site plan or subdivision approvals will require referral to County Planning under New York State General Municipal Law, Section 239.

(Appendix A-2, Rockland County Planning Department, DEIS Review Memorandum, Douglas J. Schuetz, Acting Commissioner of Planning)

Response No. 1A-4

Tables I-1 and II-1 have been expanded and revised to include all interested agencies as well as agencies that require approval and permitting for the site.

III.C.1B Comments Regarding DEIS Project Description

Comment No. 1B-1

Multiple pages of the DEIS, including several appendices, lists the Tax Map ID for the site as 19.11-1-1. Our records indicate that the Tax Map ID is 19.16-1-14. The Tax Map ID should be corrected throughout the document.

(Appendix A-2, Rockland County Planning Department, DEIS Review Memorandum, Douglas J. Schuetz, Acting Commissioner of Planning)

Response No. 1B-1

The Tax Map ID has been corrected in the FEIS document to 19.16-1-14.

Comment No. 1B-2

Part of this project will include a subdivision. However, based on our records, this parent Parcel 19.16-1-14, has yet to be subdivided. It is unclear as to how a DEIS is being prepared for a site that does not yet exist. Therefore, the scope and the DEIS should at this point include the entire parcel in question until such parcel is subdivided.

(Appendix A-2, Rockland County Planning Department, DEIS Review Memorandum, Douglas J. Schuetz, Acting Commissioner of Planning)

Response No. 1B-2

The proposed action is to take place on the ±23.86 acre site. The subdivision component of this project will consist of a two lot subdivision of the existing tax lot, which has a total area of approximately ±154.6 acres. The remaining area

of the existing lot, approximately 131 acres, will continue to be owned and maintained by the Town of Haverstraw.

Comment No. 1B-3

The property at issue is identified as being +/- 22.93 acre (“Property”). There should be a precise number or a reason for the estimation and the amount of the potential deviation. The Applicant’s original proposal contemplated six longer buildings. However, at the request of the Town, the Applicant redesigned the Proposed Action to seven buildings to allow for shorter buildings to accommodate the same number of potential units (300). Please clarify if the proposed acreage takes this change into account, and if not, the exact acreage for the current Proposed Action (with seven buildings) should be identified with an updated metes and bounds description.

(Appendix A-3, Silverberg Zalantis, LLC, DEIS Review Memorandum, Christie Addona, Town Land Use and Zoning Attorney)

Response No. 1B-3

The surveyor is working on an updated metes and bounds description and map, and it will be provided as soon as it is available.

Comment No. 1B-4

Further, the Proposed Action includes improvements on property currently contemplated to remain owned by the Town – including removing an existing dilapidated structure, installation of a stormwater management basin, and construction of the round-about to provide access to the Property and the remainder of Letchworth Village. The Applicant must come to an agreement(s) with the Town as to the Applicant’s long-term use and maintenance of this area.

(Appendix A-3, Silverberg Zalantis, LLC, DEIS Review Memorandum, Christie Addona, Town Land Use and Zoning Attorney)

Response No. 1B-4

Based on conversations with the Town and the Consulting Engineer, Civil Design Works, the proposed improvements on Town property will be dedicated in a 200' right-of-way to include the boulevard, roundabout, driveways, and stormwater management practice. The plans have been revised so that only Town drainage will be conveyed to the practice within the right-of-way. All improvements within the Town right-of-way will be maintained by the Town.

Comment No. 1B-5

There is reference to SESI Consulting Engineers conducting a subsurface study and investigation and the stormwater management both being based upon the 22.93 acres area. Does that include the additional land needed to incorporate the seventh building and the land that will remain owned by the Town but where the Applicant is proposing to do work and make long-term improvements? If not, the study/analysis should be expanded to include those areas. The same applies for any other environmental impacts analysis that was limited to the 22.93 acre area – if that area does not include the expanded property for the seventh building and the Town property where the Applicant proposes to make improvements.

(Appendix A-3, Silverberg Zalantis, LLC, DEIS Review Memorandum, Christie Addona, Town Land Use and Zoning Attorney)

Response No. 1B-5

An updated geotechnical analysis was performed by SESI Consulting Engineers including all of the property for the proposed action in addition to the future Town right-of-way and stormwater management practice. This updated report is included in Appendix B.

Comment No. 1B-6

CrossLife Church, which is on the other side of Ridge Road from the Proposed Action, has a recorded easement with the Town for access to its property as Ridge Road is Town property. The Applicant must coordinate with the Town and CrossLife Church to ensure the easement is adhered to or a new easement is recorded. A copy of the existing easement is attached hereto.

(Appendix A-3, Silverberg Zalantis, LLC, DEIS Review Memorandum, Christie Addona, Town Land Use and Zoning Attorney)

Response No. 1B-6

The existing easement will not be disturbed or impeded. Once the right-of-way is established for the new boulevard and roundabout, an easement will no longer be required for CrossLife Church as they will have direct access to the new Town right-of-way.

Comment No. 1B-7

What is the basis for the statement that “The Applicant and Town have agreed that the purchase price and entering into the PILOT program sufficiently mitigates any adverse fiscal and economic impacts generated by the Proposed Action.” (P. I-10).

(Appendix A-3, Silverberg Zalantis, LLC, DEIS Review Memorandum, Christie Addona, Town Land Use and Zoning Attorney)

Response No. 1B-7

The Applicant and the Town entered a purchase and sale agreement that establishes a purchase price to be paid to the Town, together with an agreed-upon PILOT schedule. Since the Town is prohibited by the N.Y.S. Constitution from making gifts, the agreement, including the PILOT schedule, reflects the fair market value of the land and the PILOT reflects the anticipated revenue needed to offset additional Town expenses related to or generated by the project.

Comment No. 1B-8

Per our review of the DEIS, NYSOGS does not have approvals and as such is an interested agency. Should the project however require any temporary construction impact or permanent structures placed on state-owned parcels, it would require approvals from the NYSOGS State Asset Land Management Office.

(Appendix A-4, NYS Office of General Services State Asset and Land Management, DEIS Review Memorandum, Mark McGlynn)

Response No. 1B-8

The project doesn't propose any temporary construction or permanent structures on State owned land.

Comment No. 1B-9

And it's our new modern age. · Are you going to put some charges around there for cars, because we're going electric, I guess, and so we need to have that?

(Appendix A-5, Town Of Haverstraw Planning Board Meeting, Public Hearing Transcript, Chairman Corallo)

Response No. 1B-9

The project will have EV charging capability within the garages, as well as EV charging spaces scattered throughout the parking lots.

Comment No. 1B-10

I just want to know how many bedrooms are going to be in each of these units? · What's the intended?

(Appendix A-5, Town Of Haverstraw Planning Board Meeting, Public Hearing Transcript, Darla Perrotto, 5 Balsam Road)

Response No. 1B-10

The buildings will contain a mix of one-bedroom and two-bedroom units. The "A" type buildings will have 5 one-bedroom units and 36 two-bedroom units. The "B" type buildings will have 14 one-bedroom units and 34 two-bedroom units.

Comment No. 1B-11

How many bedrooms are going to be in the units?· What are they

(Appendix A-5, Town Of Haverstraw Planning Board Meeting, Public Hearing Transcript, Darla Perrotto, 5 Balsam Road)

Response No. 1B-11

The buildings will contain a mix of one-bedroom and two-bedroom units. The "A" type buildings will have 5 one-bedroom units and 36 two-bedroom units. The "B" type buildings will have 14 one-bedroom units and 34 two-bedroom units.

Comment No. 1B-12

We're blocking -- eliminating Ridge Road, now they're going to come into the roundabout and use up more parking spaces, and I think it could have a negative impact as far as we're concerned with the elimination of Ridge Road.

(Appendix A-5, Town Of Haverstraw Planning Board Meeting, Public Hearing Transcript, Jose Castro, Representative of CrossLife Church)

Response No. 1B-12

The layout plan has been revised to propose a separate parking area for walkers and dog walkers to park in when accessing Letchworth Village, so as not to take parking away from the Church.

Comment No. 1B-13

So our concerns are obviously with the -- and then also it, it kind of -- the new design's going to landlock the parking lot. Right now we kind of -- the functionality changes with -- by landlocking it as opposed to having Ridge Road. So the functionality of it now, you know, although Ridge Road is on the east side of the parking lot, people that are parking are able to pull in and out, and in and out without utilizing it on one side of the parking lot. And now you're landlocking it, so it's going to kind of make it a little tighter, little bit more cumbersome to utilize the parking lot with the new configuration.

(Appendix A-5, Town Of Haverstraw Planning Board Meeting, Public Hearing Transcript, Jose Castro, Representative of CrossLife Church)

Response No. 1B-13

The entrance to the Church parking lot has been coordinated with the Town's consulting engineer, who has provided us with the plans for the Church's parking lot improvements.

Comment No. 1B-14

We do have some space, the green area where the, where the retention pond is. So maybe we could integrate, enlarge the parking lot to the benefit of the church to kind of ease that and make it more beneficial, you know.

(Appendix A-5, Town Of Haverstraw Planning Board Meeting, Public Hearing Transcript, Jose Castro, Representative of CrossLife Church)

Response No. 1B-14

The area outside of the Church property is proposed to be dedicated to the Town as right-of-way.

Comment No. 1B-15

And will the church address remain the same being that that part of Ridge Road is going to be eliminated? Is it still going to remain 2 Ridge Road?

(Appendix A-5, Town Of Haverstraw Planning Board Meeting, Public Hearing Transcript, Jose Castro, Representative of CrossLife Church)

Response No. 1B-15

The Church address will remain the same.

Comment No. 1B-16

And the last one would be the access to the remainder of Letchworth Village Road. You come around the circle, you have the road to the community, the road to the church, and nothing accessing the remainder of Letchworth Village to the north. A: Right, for fire truck access, emergency vehicles, as well as the dog walkers. If we don't have an access road from the circle, that's going to lead everybody into the parking lot, they're going to park on the northern end of the parking lot, and create their own little trail into Letchworth Village Road - Letchworth Village.

(Appendix A-5, Town Of Haverstraw Planning Board Meeting, Public Hearing Transcript, Jose Castro, Representative of CrossLife Church)

Response No. 1B-16

The roundabout has been designed with a connection to the balance of the Letchworth Village property for emergency access. The currently proposed layout also provides a parking area for dog walkers to park in when they enter the property, separate from the Church parking lot.

III.C.2 Land Use and Zoning

Comment No. 2-1

Over-Reliance on Town Policy from 2000 Without Addressing Current Conditions

The DEIS heavily relies on the Town's 2000 Master Plan to justify the rezoning from R-120 (Rural Residence) to LA-17 (Luxury Apartment Multifamily Residential).

However, no updated assessment is provided regarding whether community needs or development priorities have evolved since the 2000 Master Plan, particularly given regional demographic and economic shifts over the past 25 years.

This section should be expanded to include specific goals and objectives that the proposed development is intended to promote.

(Appendix A-1, Kauker & Kauker, LLC, DEIS Review Memorandum, Michael D. Kauker, PP, AICP)

Response No. 2-1

The Town of Haverstraw and the County of Rockland have both expressed that the redevelopment & revitalization of the Letchworth Village property is desired, which is referenced in the currently available Planning Documents such as the Town of Haverstraw Master Plan 2000, the Town of Haverstraw Urban Renewal Plan 2001, the Letchworth Urban Renewal Plan of 2006, and the County of Rockland Comprehensive Plan 2011. These documents were utilized to assess the Town's objectives for the Letchworth Village property.

There are no newer Planning documents available which address the demographic and economic shifts of the Town since the preparation of the available documents.

The proposed development directly promotes specific goals outlined in the Town Master Plan 2000, which includes the following: The development is situated in the area of Town known as the "Palisades Parkway Corridor", which is identified in the Town Master Plan for additional community & economic activity desired in the existing residential zoning districts in this area of the Town. The Letchworth Village property is specifically referenced as a site in the Town to be developed and repurposed. The proposed action brings community development to this area and repurposes the Letchworth Village site, accomplishing both of these specific goals in the Town Master Plan 2000.

The Letchworth Urban Renewal Plan of 2006 outlines several additional objectives for the Letchworth Village property. These objectives include the development of a community that incorporates traditional neighborhood design principles, including the development of new communities with diversified and compatible land uses. Additional design principles include the elimination of blighted properties, and providing open space along with buffering from the surrounding uses. The proposed action provides a residential community with a new housing type for the area with traditional community standards. The project will provide buffering and screening from the surrounding residential neighborhoods, and the existing unutilized buildings on the remaining Letchworth Village Property will continue to be owned and maintained by the Town.

In addition, we reviewed the 2024 Rockland Housing Needs Assessment document. The proposed action falls in line with a number of what the assessment calls out as a "Summary of Needs" for Rockland County.

The Assessment cites that increased housing options that are affordable to very-low, low, moderate, and middle income households is needed for Rockland County. It also cites the need for new housing development to honor existing social networks with proximity to existing community assets, such as parks and schools. Needs for increased production of more multifamily housing is also cited as a goal for Rockland County.

The proposed action meets several goals in the "Summary of Needs" in the 2024 Rockland Housing Needs Assessment as well as the other Town and County Plans and documents reviewed and referenced in the DEIS and FEIS.

Comment No. 2-2

Insufficient Justification for Spot Zoning Concerns

The rezoning applies to a ±22.93-acre portion of a larger ±154.6-acre parcel.

The DEIS does not fully analyze whether the LA-17 designation is appropriate in relation to surrounding R-120 and R-15/R-25 single-family residential districts.

A detailed compatibility analysis should be included to address potential spot zoning concerns, including evaluation of impacts on neighborhood character, infrastructure, and precedent-setting implications.

(Appendix A-1, Kauker & Kauker, LLC, DEIS Review Memorandum, Michael D. Kauker, PP, AICP)

Response No. 2-2

With regard to the spot zoning concern, the Letchworth Urban Renewal Plan states that diversified housing with traditional community standards is desired. The Town Master Plan states that there is a need for economic activity and development in this area. The proposed action is in harmony with the surrounding land use that consists of educational institutions, recreational facilities, parks & open spaces, as well as single family homes which are somewhat remote to the proposed development. In addition, the quality architecture and character of the proposed community is consistent with the desired character of the Town.

We have confirmed with the utility companies for water, sewer, electric & gas that the existing utility infrastructure can serve the proposed project. The redevelopment and repurposing of this property has been envisioned in Town Planning Documents. The uses permitted in the existing R-120 and R-15/25 zoning districts do not meet the planning objectives outlined in these documents. The surrounding land uses are compatible with the LA-17 zone.

Comment No. 2-3

Building Height Text Amendment Raises Precedent and Design Issues

A zoning text amendment is requested to increase the maximum height from 40 feet to approximately 44 feet (averaged from grade).

Although the DEIS states this change is to allow pitched roofs and garages, it does not fully consider how granting increased height might set a precedent for future multifamily developments in the Town or undermine the LA-17 district's originally intended character.

(Appendix A-1, Kauker & Kauker, LLC, DEIS Review Memorandum, Michael D. Kauker, PP, AICP)

The mitigation for the potential impacts on Visual Resources and Community Character is discussed on page III.B-7 and III.B-8. The description points out that the architectural aesthetic will take cues from the adjacent Letchworth Village structures but fails to acknowledge that a variance for building height is required. Full compliance with the bulk regulations would decrease the impacts to the surrounding residential neighborhood. This section must address the impacts on the surrounding properties since the maximum building height requirement is exceeded.

(Appendix A-2, Rockland County Planning Department, DEIS Review Memorandum, Douglas J. Schuetz, Acting Commissioner of Planning)

Response No. 2-3

The original design of the proposed buildings consisted of flat roofs, which was in conformance with the 40 foot building height requirement of the LA-17 Zone. After review by the Town Board, the Board was dissatisfied with the character that a flat roof would provide and requested that the proposed buildings have pitched roofs. The slope of the proposed roofs raises the building height slightly to 44' to accommodate this and the additional height triggers the need for the zoning text amendment. The applicant has prepared cross-sections which are shown on JMC Drawing C-220, as well as renderings demonstrating that the proposed building heights will provide a traditional residential aesthetic consistent with the Town Board's desires for the LA-17 district, which would not be possible without the additional building height.

Comment No. 2-4

Minimal Evaluation of Alternative Zoning Approaches

The DEIS does not sufficiently discuss why alternatives, such as a Planned Unit Development (PUD) or a floating zone, were not considered, which could offer more tailored land use controls to better align with both community goals and site constraints.

Although an analysis of the R-120 zoning was provided, the DEIS should also include an analysis of alternative development scenarios, such as those permitted under the surrounding R-15 and R-20 zoning districts.

Generalized Land Use Compatibility Assessment

The DEIS broadly asserts that the multifamily development is compatible with surrounding institutional, recreational, and residential uses.

However, it lacks a detailed examination of potential land use conflicts, such as increased traffic near schools, changes in visual character, or the intensity of site utilization compared to nearby single-family homes.

(Appendix A-1, Kauker & Kauker, LLC, DEIS Review Memorandum, Michael D. Kauker, PP, AICP)

Response No. 2-4

In coordination with the municipality, it was determined that the LA-17 district would accomplish the goals of the Town as set forth in the Town Master Plan 2000, the Letchworth Urban Renewal Plan, and the 2024 Rockland Housing Needs Assessment.

The analyzed alternative scenarios were based on the existing R-120 zoning district and didn't contemplate a rezoning to the R-15 or R-25 districts.

The DEIS Scope adopted by the Lead Agency was tailored for the site to be rezoned to the LA-17 District.

Comment No. 2-5

Subdivision and Future Development Not Fully Addressed

The DEIS proposes a subdivision to separate the ±22.93-acre development site from the larger property.

There is no analysis of how the remaining ±130 acres will be managed, rezoned, or developed in the future, which presents a major gap in understanding cumulative land use impacts.

(Appendix A-1, Kauker & Kauker, LLC, DEIS Review Memorandum, Michael D. Kauker, PP, AICP)

Response No. 2-5

The proposed action includes a two lot subdivision for our ±23.86 acre site and second proposed lot is to be own and maintained by the Town of Haverstraw as it currently operates and exists. The approved DEIS scope required that we analyze the subject site, and did not include the overall property.

Based on discussions with the Town, we have prepared a conceptual subdivision sketch showing how a development within the R-120 Zone would look for the entire ±154.5 acre property, which is included as Figure 01.

Comment No. 2-6

Incomplete Discussion of Rockland County Planning Policy Context

Although some references to the 2011 Rockland County Comprehensive Plan are made, the DEIS does not sufficiently explain how the Proposed Action meets the County's recommendations for environmental protection, smart growth, and revitalization.

(Appendix A-1, Kauker & Kauker, LLC, DEIS Review Memorandum, Michael D. Kauker, PP, AICP)

Response No. 2-6

The Rockland County Comprehensive Plan of 2011 highlights the Letchworth Village site as a property in need of revitalization and that this property is located in a "prime area" in the County that should be repurposed and developed. The proposed community development takes these ideas instilled in the Rockland County Comprehensive Plan and proposes to revitalize a portion of the Letchworth Village property for a more desired use by the County and the Town of Haverstraw.

As outlined in the "Comprehensive Plan Vision", preservation of open space and other environmental resources is a goal as well as expanding housing opportunities in the County.

Although the entire Letchworth Village Property is ±154.5 acres, the Proposed Action is proposed to be situated on ±23.86 acres specifically to ensure the goals of the Rockland County Comprehensive Plan are met to the greatest amount of satisfaction. The ±23.86 acre project site limits the amount of existing

building in comparison to other areas on the ±154.5 acre parcel. Tree removal is also minimal and less impactful in this area of the ±154.5 acre parcel. The proposed action also meets the goal of expanding housing opportunities in the county with the proposed apartment style housing development

The proposed action's layout, location, and technicalities are all ensured to incorporate the County's visions and recommendations of environmental protection, smart growth development, and revitalization.

Comment No. 2-7

Under Section III.A.1.c. Review of Applicable Town of Haverstraw Documents and Rockland County Planning Documents, we suggest the 2024 Rockland County Housing Needs Assessment be reviewed and included in this analysis as this study provides added context to the need for housing in the County that the Letchworth Project will contribute to alleviating.

(Appendix A-2, Rockland County Planning Department, DEIS Review Memorandum, Douglas J. Schuetz, Acting Commissioner of Planning)

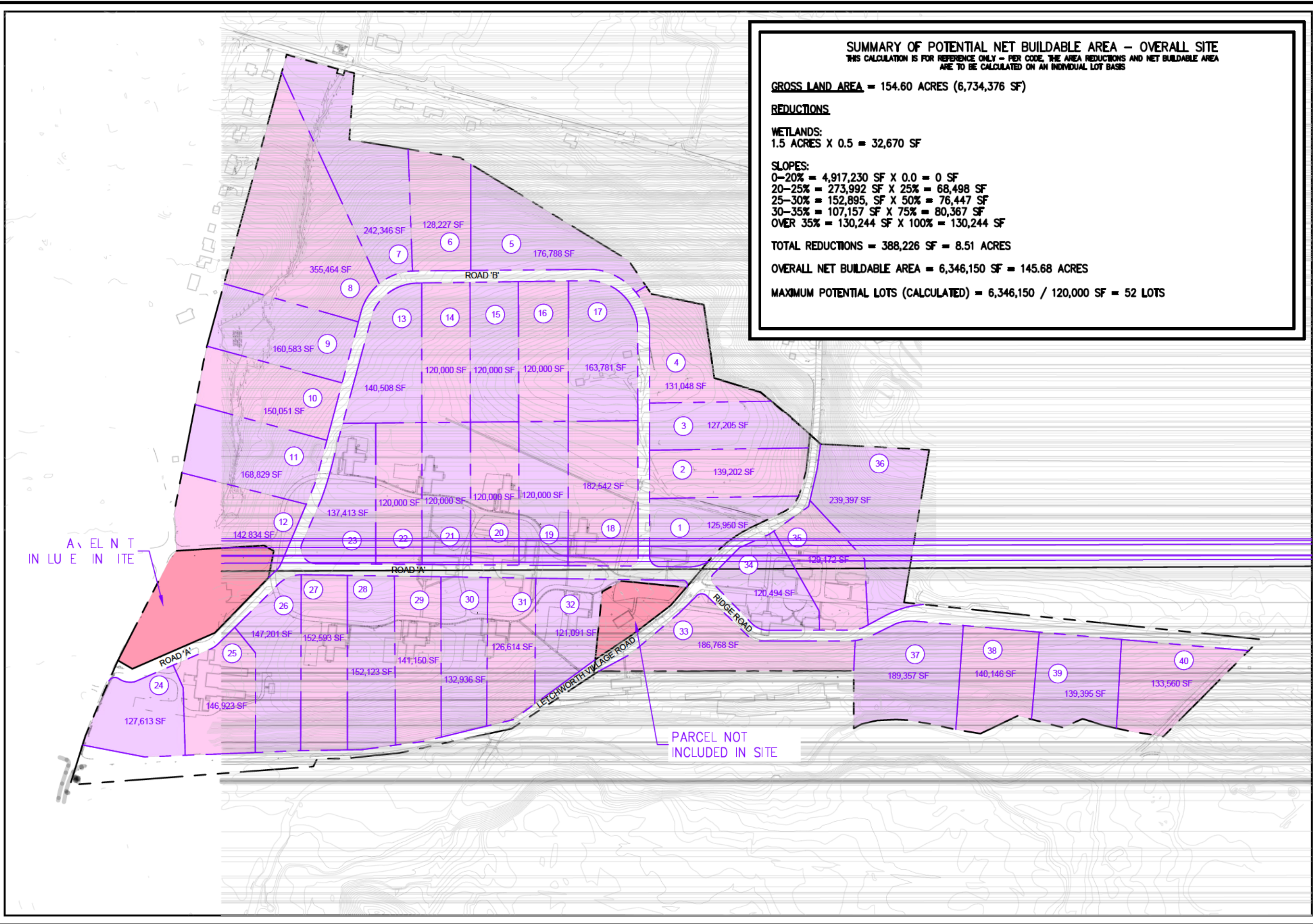
Response No. 2-7

We reviewed the 2024 Rockland Housing Needs Assessment document. The proposed action falls in line with a number of what the assessment calls out as "Summary of Needs" for Rockland County.

The Assessment cites that increased housing options that are affordable to very-low, low, moderate, and middle income households are needed for Rockland County. It also cites the need for new housing development to honor existing social networks with proximity to existing community assets, such as

parks and schools. A need for additional multifamily housing is also cited as a goal for Rockland County.

The proposed action meets several goals in the "Summary of Needs" in the 2024 Rockland Housing Needs Assessment as well as the other Town and County Plans and documents reviewed and referenced in the DEIS and FEIS.



SUMMARY OF POTENTIAL NET BUILDABLE AREA – OVERALL SITE

THIS CALCULATION IS FOR REFERENCE ONLY – PER CODE, THE AREA REDUCTIONS AND NET BUILDABLE AREA ARE TO BE CALCULATED ON AN INDIVIDUAL LOT BASIS

GROSS LAND AREA = 154.60 ACRES (6,734,376 SF)

REDUCTIONS

WETLANDS:
1.5 ACRES X 0.5 = 32,670 SF

SLOPES:
0–20% = 4,917,230 SF X 0.0 = 0 SF
20–25% = 273,992 SF X 25% = 68,498 SF
25–30% = 152,895 SF X 50% = 76,447 SF
30–35% = 107,157 SF X 75% = 80,367 SF
OVER 35% = 130,244 SF X 100% = 130,244 SF

TOTAL REDUCTIONS = 388,226 SF = 8.51 ACRES

OVERALL NET BUILDABLE AREA = 6,346,150 SF = 145.68 ACRES

MAXIMUM POTENTIAL LOTS (CALCULATED) = 6,346,150 / 120,000 SF = 52 LOTS

JMC

120 BEDFORD RD
ARMONK
NY 10604
(914) 273-5225
fax 273-2102
JMCPLLC.COM

LETCHWORTH ROAD RESIDENTIAL DEVELOPMENT

HAVERSTRAW, NY

ALTERNATIVE SUBDIVISION PLAN

"EXISTING LETCHWORTH PROPERTY"

DATE: 08/15/2025

FIGURE: 01

JMC PROJECT: 21090

SCALE: 1" = 400'

COPYRIGHT © 2025 by JMC. All Rights Reserved. No part of this document may be reproduced, stored in a retrieval system, or transmitted in any form or by means, electronic, mechanical, photocopying, recording or otherwise, without the prior written permission of JMC PLANNING, ENGINEERING, LANDSCAPE ARCHITECTURE & LAND SURVEYING, PLLC. JMC SITE DEVELOPMENT CONSULTANTS, LLC | JOHN MEYER CONSULTING, INC. (JMC). Any modifications or alterations to this document without the written permission of JMC shall render them invalid and unusable.

917000 SUBDIVISION.dwg 11/1/2024 1:11:44 PM

III.C.3 Visual Resources and Community Character

Comment No. 3-1

Limited Range Analysis

The DEIS largely restricts its visual impact analysis to viewpoints from adjacent roadways and nearby properties.

Broader regional viewpoints, such as long-distance sightlines or views from significant public vantage points (e.g., parks, trails, or historic areas nearby) are not considered. A more comprehensive visual analysis would be appropriate given the site's location within a semi-rural corridor.

(Appendix A-1, Kauker & Kauker, LLC, DEIS Review Memorandum, Michael D. Kauker, PP, AICP)

Response No. 3-1

Figure No 02 has been prepared demonstrating that the project will not be visible from the broader regional viewpoints considering the distance, topography, and vegetation between the project site and surrounding areas.

Comment No. 3-2

One is visibility concerns with the proposed trees along Letchworth Village Road. · It's harder to tell from the design, but how much is it really going to mess with our visibility to the parking lot. · Maybe not so much the church but it looks like you're buffering the parking lot off a little bit. ·

(Appendix A-5, Town Of Haverstraw Planning Board Meeting, Public Hearing Transcript, Jose Castro, Representative of CrossLife Church)

Response No. 3-2

Figure III.B-1-P shows a photo simulation from the Church Parking Lot. The rendering shows that the proposed plantings adjacent to the entrance boulevard and roundabout will not obstruct visibility to the church or their parking lot.

Comment No. 3-3

Another one would be additional signage, right. · So now we're restructuring, we're changing the entry to the church, now you have to go in a separate road that looks like you're entering a community as opposed to the church, to a roundabout. · So I think we would benefit from additional signage on Letchworth Village Road to the roundabout, at the roundabout to direct anybody that's visiting, congregants, or new people, whomever it is. · Like, it's going to look like a church that's tucked away in a field with no access, you know. · So we want to really stress the fact I think there should be additional signage in place for that.

(Appendix A-5, Town Of Haverstraw Planning Board Meeting, Public Hearing Transcript, Jose Castro, Representative of CrossLife Church)

Response No. 3-3

The Church will be able to seek additional signage within the newly created right-of-way.

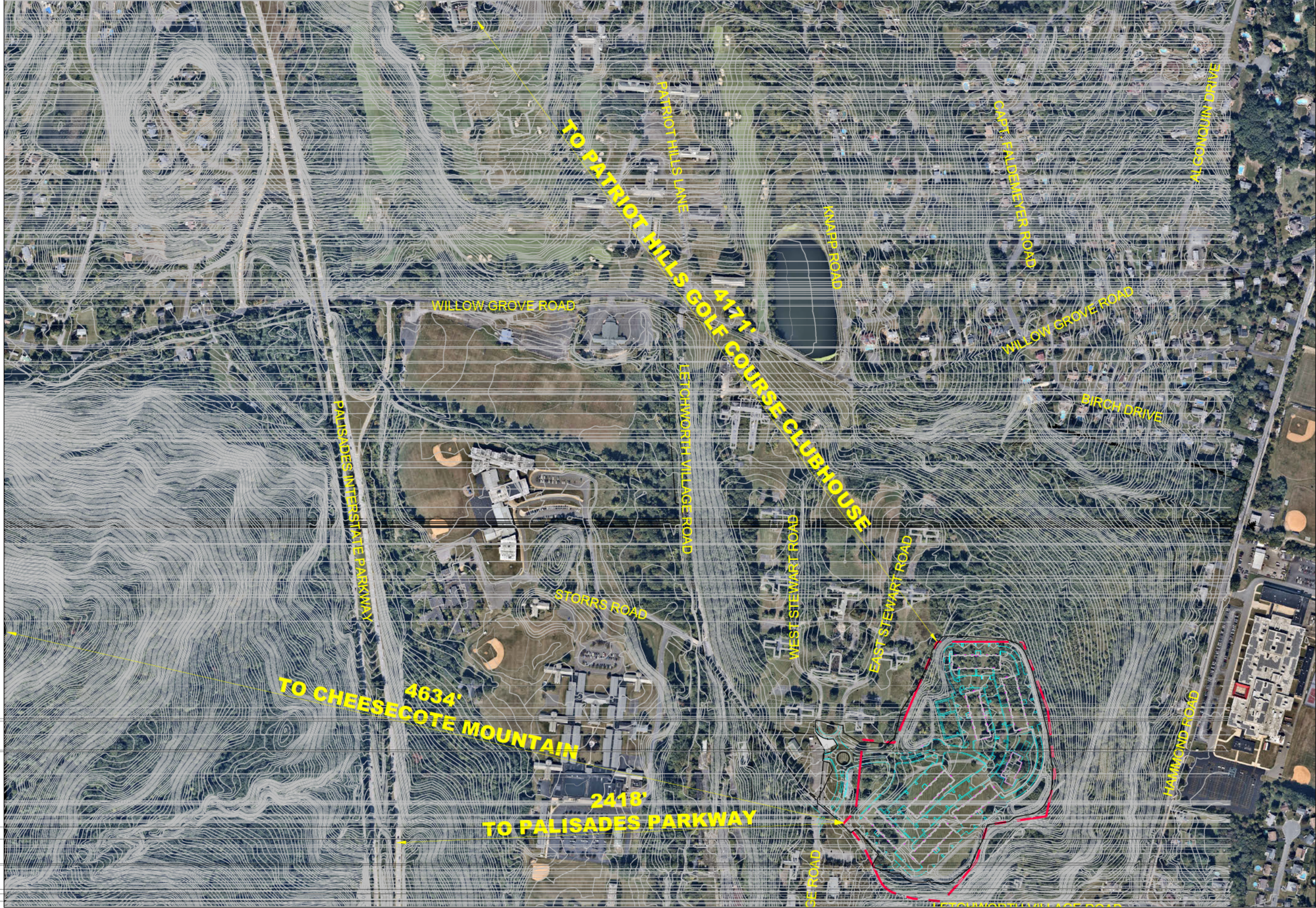
Comment No. 3-4

Lighting concerns. So now with landlocking the parking lot and eliminating Ridge Road, there's going to be -- I think it's going to limit the lighting on the east - more importantly on the east side of the parking lot. So I think you've got to kind of come up with something for lighting.

(Appendix A-5, Town Of Haverstraw Planning Board Meeting, Public Hearing Transcript, Jose Castro, Representative of CrossLife Church)

Response No. 3-4

There will be new lighting proposed for the boulevard / roundabout.



LETCHWORTH VILLAGE ROAD
LETCHWORTH ROAD RESIDENTIAL DEVELOPMENT
HAVERSTRAW, NY

VISIBILITY ASSESSMENT

DATE: 08/15/2025

JMC PROJECT: 21090

FIGURE: 02

SCALE: 1" = 500'

JMC
120 BEDFORD RD
ARMONK
NY 10604
(914) 273-5225
fax 273-2102
JMCPLLC.COM



III.C.4 Soils, Topography and Steep Slopes

Comment No. 4-1

The project will require extensive earthwork to manipulate the topography to achieve the target elevations as identified on the Site Grading Plan. It is understood that the current grading proposed can be considered "preliminary" at this stage of plan development but well within practical target goals.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 4-1

The comment is noted.

Comment No. 4-2

The cut and fill identified on III.C-10 (and 11-8) does not match the cut and fill analysis map provided. This should be corrected.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 4-2

Figure III.C-4 has been updated. The updated analysis results in a ±62,570 sf (Cut), ±96,470 sf (Fill), and ±33,900 sf (Net Fill).

Comment No. 4-3

As a result of the extensive earthwork that is involved, it may be difficult to achieve this amount of disturbance without exceeding the 5-acre threshold per NYSDEC. This should be further expanded upon and if necessary, phasing plans fully developed to illustrate the ability to manage the earthwork without excessive import/export of material offsite temporarily.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 4-3

The proposed action will exceed the NYSDEC 5-acre disturbance threshold. Construction phasing plans have been developed and show the cut & fill quantities for each of the construction phases as well as the limit of disturbance for each phase. The construction phasing plans also include a sequence of construction notes for each set for each phase. Each phase is to be managed by the contractor and inspected by a Professional Engineer. Best Management Practices are to be incorporated in construction.

Comment No. 4-4

The soil movement analysis should also fully expand on the materials that will be imported. It is noted that portions of that fill material will be for the installation of specific infrastructure, utility bedding materials, asphalt paving, landscaping materials, etc. A further evaluation of the fill materials should be detailed and if additional materials outside of base infrastructure are necessary, the points of origin should be provided. A manifest for all imported soil will be required.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 4-4

Revised cut and fill volumes have been created for the various materials present on site.

Comment No. 4-5

Infiltration testing was performed {Table III .C-1) as part of the geotechnical work for the stormwater system however, it does not appear that the elevations of the testing were fully coordinated with the design proposals. The infiltration results can be accepted for conceptual or preliminary design purposes, but further testing will be required within the tolerances of the NYS Stormwater Manual (and must be witnessed by the Town) prior to any design being accepted.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 4-5

Additional infiltration testing was performed as part of the updated geotechnical analysis prepared by SESI Consulting Engineers. A copy of this report is included in Appendix B, as well as the revised Stormwater Pollution Prevention Plan.

Comment No. 4-6

For retaining walls in excess of 4' in height (III.C-11), all walls must be engineered as well as inspected and certified after installation by a NYS Licensed Professional Engineer.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 4-6

All retaining walls above 4' in height are to be designed and inspected by a Professional Engineer.

Comment No. 4-7

Under Section III.C.2.a.3. the applicant describes how they will conduct seeding of the disturbed area to stabilize and prevent soil erosion. It is recommended that the applicant consider using native grasses, or a native ground cover alternative, which could provide the additional benefit of being less water intensive and needing less maintenance than traditional grass seeding.

(Appendix A-2, Rockland County Planning Department, DEIS Review Memorandum, Douglas J. Schuetz, Acting Commissioner of Planning)

Response No. 4-7

For areas of steep slopes, the applicant proposes to use as native seed mix such as Ernst Seeds Native Steep Slope Mix – ERNMX-181-2 or equal, which is a mix of native grasses and forbs. For areas where lawn is desired near

buildings and open spaces the applicant proposes using Eco-Lawn, or No-Mow mix which is a blend of fine fescue grasses by Wildflower Farm or equal.

Comment No. 4-8

You're going to put some retaining walls around this, the property?

(Appendix A-5, Town Of Haverstraw Planning Board Meeting, Public Hearing Transcript, Chairman Corallo)

Response No. 4-8

The project proposes the construction of retaining walls along the eastern side of the property to accommodate the grade changes and reduce impacts to steep slopes, where possible.

Comment No. 4-9

Are you going to put a fence on those walls?

(Appendix A-5, Town Of Haverstraw Planning Board Meeting, Public Hearing Transcript, Chairman Corallo)

Response No. 4-9

The retaining walls will have fences for fall protection as required by the building code.

III.C.5 Flora and Fauna**Comment No. 5-1**

Section III.D.1.b Flora, Fauna and Habitat, Existing Conditions, indicates that the project site is not within an area displayed in the Rare Plants and Rare Animals layer or the Significant Natural Communities layer on the New York State Environmental Resource Mapper , therefore the New York Natural Heritage Program (“NYNHP”) has no records to report in the vicinity of the Project Site. The Hudson River Natural Resources Mapper, however, indicates the site is part of a Significant Biodiversity Area (SBA) and a portion of the site is a ‘Known Area for Migratory Fish (due to its proximity to the Minisceongo Creek). SBAs are landscape areas in the Hudson River Estuary that contain high concentrations of biodiversity or unique ecological features. Significant natural communities provide an assemblage of interacting plant and animal populations that are considered significant from a statewide perspective because they are rare or high quality based on size, habitat conditions and quality of the surrounding landscape. These areas contribute to and serve as a framework for conservation partnerships and voluntary protection efforts. One of the most significant threats to biodiversity is habitat destruction, alteration, and fragmentation. The DEIS recognizes that the proposed action would cause the direct loss of some habitat for the resident plant and animal populations that could be used for breeding, roosting, feeding, and shelter. Careful consideration should be given to development impacts within an SBA. Proactive planning that avoids or minimizes impact to the habitat of Important Areas and maintains habitat connections for wildlife movement will contribute to the long-term biodiversity of the region. The DEIS must consider the impacts of this development on the biodiversity of the area, specifically habitat fragmentation and the impact of the movement of species to and from and within these sensitive habitats. A site-specific biological inventory or natural resource assessment should be considered. A pdf titled

"An Approach for Conserving Biodiversity in the Hudson River Estuary Corridor" that identifies voluntary, non-regulatory strategies for conserving wildlife and habitat in the region can be found at:

<https://hudson.dnr.cals.cornell.edu/library>

(Appendix A-2, Rockland County Planning Depart, Douglas J. Schuetz, Acting Commissioner of Planning)

Response No. 5-1

It is noted that the ±23.86 acre project site fully lies within the Significant Biodiversity Area, SBA, known as the "Hudson Highlands West". Which is composed of 801,972 acres, an area extending from Orange and Rockland counties in New York, as well as Passaic, Bergen, and Morris counties in New Jersey. Regarding the area for Migratory Fish along the Miniceango Creek to the south of the site and Letchworth Village Road, only a small portion of the ±23.86 acre project site is to take place in the Migratory Fish Area, based on the Hudson Vallet Natural Resource Mapper. There are many different uses currently operating within the Miniceango Creek Migratory Fish area in the municipalities of Haverstraw & West Haverstraw, including single family homes, schools, industrial plants, and commercial use buildings. Most of the project's ±23.86 acre site is not situated in the delineated migratory fish area. The area of our site that is situated in the migratory fish area is where the proposed Stormwater Basin 2B is situated. The proposed action will have a relatively insignificant impact on the Miniceango Creek Migratory Fish Area.

Comment No. 5-2

It is likely that a significant number of trees will be removed to accommodate the proposed residential development. Mature trees and mature forested areas remove, absorb and store carbon in wood, leaves, and the soil. When

trees and forests are cleared, that carbon is lost. New York's recently adopted New York State's Scoping Plan, required as part of The Climate Leadership and Community Protection Act, calls for protecting the ability of forests to serve as carbon sinks and calls for promoting the most effective methods of increasing New York's carbon sequestration, storage, and climate resilience. The protection of trees, minimization of loss of trees, impacts of the loss of forested area, and forest loss mitigation must be addressed. Additionally, the proposal must comply with Chapter 167 Sections 91 and 92 of the Town Code.

(Appendix A-2, Rockland County Planning Depart, Douglas J. Schuetz, Acting Commissioner of Planning)

Response No. 5-2

The comment is noted. The New York State Scoping Plan highlights and discusses specific types of management regarding carbon sequestration & storage, including "Promote Sustainable Forest Management" and "Improve Soil Health, Nutrient Management, and Agroforestry". A landscape plan has been provided to the Lead Agency. The plantings and seedings are all to be native to the Rockland County area. It is noted that much of the project site area is currently Town maintained park fields as well as existing unutilized structures. Best management practices are to be utilized for tree protection and to ensure minimizing tree loss. The proposed action will work to The proposed tree removal is to comply with Town Code Chapters 167 Sections 91 & 92.

Comment No. 5-3

To comply with Chapter 167 Section 93 of the Town Code, a significant number of trees will likely need to be planted to replace those lost. The DEIS

indicates that the majority of the ±22.93-acre Project Site is comprised of native tree vegetation and grassland / field areas. We recommend the use of trees as well as other plantings that are native to New York to help preserve and promote biodiversity. Native plants are better adapted to the local climate and soil, making them easier to care for, and results in the need for less fertilizer, pesticides, and use of water. They also have deeper root systems that help prevent erosion and increased runoff into local waterbodies. A pdf titled "Native Plants for Gardening and Landscaping Fact Sheets" that lists native species and the environments in which they can grow can be found on the New York State Department of Environmental Conservation's website: <https://www.dec.ny.gov/get-involved/living-green/sustainable-landscaping>. Native plants should be incorporated in the design of the site from the outset and may be considered as part of the mitigation of potential negative environmental impacts of the development.

(Appendix A-2, Rockland County Planning Depart, Douglas J. Schuetz, Acting Commissioner of Planning)

Response No. 5-3

A landscaping plan and planting schedule is provided as part of the site plan set for review and approval by the Town.

III.C.6 Stormwater Management

Comment No. 6-1

Corrections to be noted to the DEIS

Page 1-6, II1.E-4 and App C-1 page 12 identify five stormwater management basins while only (4) are proposed.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 6-1

The SWPPP has been revised for consistency. The correct number of stormwater management practices are identified within the report.

Comment No. 6-2

Corrections to be noted to the DEIS

Naming conventions for existing and proposed drainage areas are inconsistent throughout the text, mapping and modeling.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 6-2

The plans, report, and hydrologic model have been revised for consistency.

Comment No. 6-3

Corrections to be noted to the DEIS

II1.E-4 2024 Stormwater Manual must be utilized

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 6-3

The drainage analysis has been revised to adhere to the requirements of the 2024 Stormwater Design Manual.

Comment No. 6-4

Corrections to be noted to the DEIS

App C-1 page 1- Update Introduction

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 6-4

The introduction has been updated to reflect the current versions of the SPDES General Permit and the Stormwater Design Manual.

Comment No. 6-5

Corrections to be noted to the DEIS

App C-1 page 1,9,36 - Update reference for SPDES General Permit and Stormwater Manual

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 6-5

References to the SPDES General Permit and the Stormwater Manual have been updated to reflect the current versions.

Comment No. 6-6

Corrections to be noted to the DEIS

App C-1 page 9 -Type III storm distribution is no longer permitted. In addition to the precipitation data update (which should be included as an appendix of the SWPPP), the rainfall distribution curve must be established from the NRCC website. Guidance is offered in Section 4.9 of the Stormwater Manual.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 6-6

The hydrologic model has been revised to update the rainfall distribution curve from the Type III storm distribution to a distribution curve based on rainfall data from the NRCC website. The Time-depth curve has been included as part of the hydrologic calculations within Appendix A & B.

Comment No. 6-7

Corrections to be noted to the DEIS

App C-1 page 35 - Remove reference to Westchester County Code

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 6-7

Reference to the Westchester County Code has been removed accordingly.

Comment No. 6-8

Drainage areas of report text do not match drainage area map. Page 17 references a Proposed Drainage Area 1-G that does not match the drainage area map. Entire analysis must be revised to be consistent throughout.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 6-8

The plans, report, and hydrologic model have been revised for consistency.

Comment No. 6-9

The applicant has attempted to justify the use of the "project boundary" as the point of evaluation however this does not address impacts directly to properties/areas offsite and direct points of influence. Zero net increase is specific to a point of interest (or location) that is based on topography. Since the project is on a ridge (or peak) of the surrounding area, a broader evaluation needs to be conducted to evaluate the impacts as the runoff leaves the project site at the specific discharge points presented for proposed conditions based on the existing contributions to those locations. If areas

cannot be resolved at specific location, then a broader analysis needs to be provided and potentially offsite stormwater improvements considered to justify the evaluation results.

For example, the impacts associated with the runoff from EDA-1A (discharging toward Hammond Road and Letchworth Village Road) have no relevance to EDA-1B (which ultimately discharges to a drainage ditch along the north side of the property and to the stream passing through the North Rockland High School Campus). Combining those results has no basis for mitigative efforts and does not achieve the goals required to meet zero net increase.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 6-9

The drainage area analysis has been revised to evaluate three design points (boundaries). The original drainage area has been divided to provide analysis for the three points of: east towards Hammond Road, south towards Letchworth Village Road, and north towards the existing stream. The analysis will now analyze pre- and post- conditions at these three locations to meet a zero net increase.

Comment No. 6-10

For proposed conditions, direct impacts must be evaluated for contributions at the discharge points. The use of level spreaders will be evaluated as a point of discharge location and must be compared to the direct watershed contribution that would be directed along the same path during current conditions.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 6-10

For the proposed conditions, level spreaders will be used for the discharge points. The level spreaders will be sized/widened to provide more opportunity for sheet flow to occur beyond the discharge point. Level spreaders will be used at two of the three discharge points, while the third will discharge via a rip-rap apron.

Comment No. 6-11

The project has also presented a stormwater mitigation basin on Town property along the boulevard. This will not be permitted. There is sufficient opportunity on the project site to collect and manage the stormwater infrastructure.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 6-11

The proposed stormwater mitigation basin has been relocated from Town property along the boulevard and revised to be a subsurface chamber system. In place of the basin, bioretention area has been proposed on Town property to treat new impervious areas created within Town Property.

Comment No. 6-12

We recommend that a workshop be set up to further discuss the stormwater analysis/evaluation as well as the impacts of offsite stormwater contribution.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 6-12

This comment is noted.

Comment No. 6-13

Further review of the critical components of the stormwater design manual (i.e. WQv, RRV, CPv, Qp, Qf) will be assessed once the established points of evaluation have been resolved.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 6-13

This comment is noted.

Comment No. 6-14

The DEIS seems to be lacking an analysis of “Surface and Subsurface Waters”. This department strongly urges the Planning Board require that the applicant add this information to Section III. While the DEIS states that no wetlands are present on the site, there are federal wetlands on the norther portion of the

parent parcel, 19.16-1-14. Again, until subdivided an environmental impact analysis should be looking at the entire existing parcel. We also recommend that the Existing Environmental Conditions, Anticipated Impacts and Mitigation be explored, particularly because of the site's proximity to the Minisceongo Creek. The DEIS should address adverse impacts to water resources and proposed mitigation efforts. This analysis should include the potential for non-point sources of pollution including pesticides, deicing agents and other non-point sources of pollutants that may result from both construction and post-construction.

(Appendix A-2, Rockland County Planning Department, DEIS Review Memorandum, Douglas J. Schuetz, Acting Commissioner of Planning)

Response No. 6-14

The proposed action and associated development is to take place on the ±23.86 acre site. The site is to be subdivided from the existing ±154.5 acre parcel. Our site is well to the south of the existing federal wetlands and adjacent buffer areas and all proposed disturbances will not take place within these wetlands and buffer areas. Pesticides and other landscape pollutants will be utilized in typical nature under the proposed action.

Comment No. 6-15

To help reduce the impact of this development we recommend that the DEIS include an analysis of a reduction of impervious surface to minimize the impacts of stormwater runoff. This analysis should consider the use of green infrastructure such as porous pavers or porous concrete for use in the parking areas to replace the use of conventional asphalt in managing stormwater and minimizing off site impacts. If installed correctly and properly maintained porous pavers have been shown to be effective in helping manage off-site

runoff of stormwater. In addition to permeable pavers, other green infrastructure techniques should be considered such as bioswales, native landscaped islands in the parking areas, rain gardens, and rainwater capture. For long term effectiveness of permeable pavers and other green infrastructure techniques it is recommended that the Town and the applicant review Chapter 5 'Green Infrastructure Practices' of the 2015 NYSDEC Stormwater Design Manual.

(Appendix A-2, Rockland County Planning Department, DEIS Review Memorandum, Douglas J. Schuetz, Acting Commissioner of Planning)

Response No. 6-15

The project reduces impervious surfaces to the maximum extent practicable. The project incorporates large areas of grass and landscaped areas throughout the proposed parking lots, in between buildings, and throughout the site. The project also proposes a number of green infrastructure practices such as vegetate swales and a bioretention basin.

Comment No.6-16

NYSOGS has concerns regarding the impact of outflow from the two eastern-most stormwater basins onto the state parcel. The presence of stormwater facility emergency spillways and downslope spillway protection are not clarified however any discharge from an emergency spillway onto our parcel may impact safety and future uses of that parcel. The slopes of the state land receiving discharge from these facilities are steep and it is not clear whether ground stability will be impacted beyond the project limits. Relatedly, the landscape plan proposes new trees over the dam embankments which could impact the structure's stability.

To ensure the state parcel and its current or future uses are not at risk, we request the stormwater facility design not direct concentrated erosive flows onto our parcel from the emergency spillway, that the stormwater facilities be sized to safety class standards with consideration that current and future occupiable structures will be present on our parcel, and that trees not be planted on the embankments adjacent to our property line.

(Appendix A-4, NYS Office of General Services State Asset and Land Management, DEIS Review Memorandum, Mark McGlynn)

Response No. 6-16

The locations of the emergency discharges have been revised to be directed away from the state owned parcel. In addition to the relocation of the discharge point, oversized level spreaders have been provided to further ensure sheet flow occurs at the release point to mitigate erosive flows.

Comment No. 6-17

On the west side of the road going in, the new road going in to the roundabout, you're going to build a nice beautiful green area. Who is responsible for that, to take care of it and maintain it later on?

(Appendix A-5, Town Of Haverstraw Planning Board Meeting, Public Hearing Transcript, Chairman Corallo)

Response No. 6-17

The Town will be responsible for the stormwater practice that will be located within the Town right-of-way. This practice has been designed to only accept runoff from the impervious surfaces within the right-of-way.

Comment No. 6-18

On the right side of the road going in, somewhere along there -- I don't have it in front of me, you're going to put a pond in there; right?

(Appendix A-5, Town Of Haverstraw Planning Board Meeting, Public Hearing Transcript, Chairman Corallo)

Response No. 6-18

A bioretention area is proposed to treat the runoff from the impervious surfaces within the Town right-of-way.

Comment No. 6-19

Water basin. And that would be on the applicant's watch, that he has to put a fence around it and all that kind of stuff?

(Appendix A-5, Town Of Haverstraw Planning Board Meeting, Public Hearing Transcript, Chairman Corallo)

Response No. 6-19

The stormwater basins will be fenced where required in accordance with the New York State DEC Stormwater Management Design Manual.

Comment No. 6-20

Drainage concerns: With the new roadway, would there be additional drainage on the east side of the parking lot? And you know, I'm not sure what

the pitch of the roadway would be at the circle going towards the church parking lot.

(Appendix A-5, Town Of Haverstraw Planning Board Meeting, Public Hearing Transcript, Representative of CrossLife Church)

Response No. 6-20

All of the stormwater runoff within the new boulevard / roundabout areas will be directed to a bioretention basin within the right-of-way.

III.C-7 Water Supply and Sanitary Sewerage

Comment No. 7-1

Initial references from section 1-6 identify that the project site is within the service area and operated by Veolia Water New York. Veolia Water does not currently have any infrastructure in the immediate area of the project site. The existing water system that is onsite is reported as out of service and was independent from the Veolia operating system.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 7-1

The project proposed the construction of a water main extension from the intersection of Thiells Mt. Ivy Road to the project site. We have met with Veolia Water to discuss and coordinate this extension. In addition, we have submitted flow calculations and a will serve application to Veolia in February of 2025, which is in the process of being reviewed.

On March 12, 2026, JMC met with Gerardo Moreno (Director of Engineering), Frank McGlynn, and Paula Vina of Veolia Water Company, along with representatives of BNE Development to discuss the status of our application. The following points were confirmed during the meeting:

- The project site is located within Veolia Water Company's service territory, at the northern end of a Veolia hydraulic zone that extends south toward New Jersey.

- Veolia has received the project's water service application and is actively processing it. The project is included in Veolia's hydraulic zone planning analysis.
- Veolia confirmed that water service can be extended to the project site. Offsite infrastructure improvements will be required based on the preliminary results of the hydraulic modelling.
- The cost of the required infrastructure improvements would be borne by the developer through a contribution agreement with Veolia. BNE Real Estate has acknowledged this obligation and is prepared to execute the contribution agreement and provide the associated deposit.
- Veolia is in the process of completing the updated hydraulic analysis for the zone which will include the large amount of new development planned within this pressure zone. The analysis is expected to be finalized within 1 to 3 months. Upon completion, the specific infrastructure requirements and costs for this project will be determined, after which a formal will-serve letter can be issued.

Comment No. 7-2

The project will require an extensive off-site improvement to bring new water supply to the project location. A copy of the willingness to service application was provided in Appendix B of the DEIS but was incomplete and appears unsubmitted. No flow data was provided, references to the number of hydrants proposed do not match the proposed plans.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 7-2

See response 7-1 above.

In addition, JMC Drawing C-300, "Site Utilities Plan", shows the location of the proposed hydrants which have been coordinated with the Fire District.

Comment No. 7-3

Veolia Water must provide documentation that it can support this project in its entirety. A full Engineers Report evaluation shall be prepared and included in accordance with the Recommended Standards for Water Works 2022 Edition. It is important to note that sections 1.1.6 and section 1.1.16 must be addressed.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 7-3

See response 7-1 above.

Comment No. 7-4

Ownership of the on-site water mains shall be resolved. It may impact the current layout of the water main infrastructure.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 7-4

The water mains will be publicly owned.

Comment No. 7-5

The number and location of hydrants shall be coordinated with my office, the Fire Inspector and the Fire Chief. Provisions for additional hydrants may be requested along Letchworth Road along the project frontage.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 7-5

JMC Drawing C-300, "Site Utilities Plan", shows the location of the proposed hydrants which have been coordinated with the Fire District.

Comment No. 7-6

The plans identify an offsite sewer improvement in addition to an on-site collection system. A willingness to serve from Joint Regional is required. A hydraulic capacity analysis of the existing and proposed system shall be provided to justify the acceptance of the additional flow into the system for average and peak flow demands.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 7-6

JMC and BNE originally met with the Joint Regional Sewerage Board (JRSB) on May 23rd, 2024 to review and discuss the project. Subsequently, JMC prepared a full engineering report and hydraulic analysis of the existing and proposed sanitary sewer mains for review by the JRSB. The findings of this

report were presented to the JRSB at a meeting on 10/8/2026, during which it was stated that there was no objection to the connection and a willingness to serve letter would be issued. JMC and BNE met with the JRSB again on 2/2/2026 to follow up on the status of the willingness to serve letter. The willingness to serve letter was issued by the JRSB on 3/4/2026 and is included herewith for review.

Comment No. 7-7

Both the new water and sewer systems must be aligned and established to enter the project location through the new boulevard. This is to better serve the new development but also to provide potential connection for future development of the remaining Letchworth property.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 7-7

The water and sewer system alignments have been revised accordingly and are detailed on JMC Drawing C-300, "Site Utilities Plan".

Comment No. 7-8

Will the construction affect the well?· You know, contamination, dry it out, because now you're installing so much more drainage, so now you're capturing a lot of the groundwater.· So would you -- was there a risk of hitting the vein in the ground that feeds that well or/and you know running it dry, you know, so.· And obviously contamination is a big one, from all the construction.

(Appendix A-5, Town Of Haverstraw Planning Board Meeting, Public Hearing Transcript, Representative of CrossLife Church)

Response No. 7-8

The stormwater facilities have been designed to infiltrate stormwater runoff to the maximum extent practicable, which will minimize any potential impacts to underground aquifers.

Comment No. 7-9

And where would the main water supply be coming in from?· Maybe we could get city water at that point.· I'm not sure if that's an option.

(Appendix A-5, Town Of Haverstraw Planning Board Meeting, Public Hearing Transcript, Representative of CrossLife Church)

Response No. 7-9

The existing water main dead ends in the vicinity of the Thiells Mt. Ivy Road / Letchworth Village Road Intersection. The project proposes a water main extension which will extend the main all the way to Ridge Road. As part of this extension, the project sponsor has agreed to provide a stub for a future connection to the Church to the extent acceptable to the water company.

III.C.8 Other Utilities and Services

Comment No. 8-1

The installation of any utilities should be designed to potentially accommodate future development of the other areas of Letchworth Village.

(Appendix A-3, Silverberg Zalantis, LLC, DEIS Review Memorandum, Christie Addona, Town Land Use and Zoning Attorney)

Response No. 8-1

This comment is noted. The proposed roundabout and utilities have been designed to provide connection locations for future developments.

Comment No. 8-2

Will serve letters from Joint Regional Sewerage Board, Veolia New York Water and Orange and Rockland Utilities must be provided.

(Appendix A-3, Silverberg Zalantis, LLC, DEIS Review Memorandum, Christie Addona, Town Land Use and Zoning Attorney)

Response No. 8-2

The project proposed the construction of a water main extension from the intersection of Thiells Mt. Ivy Road to the project site. We have met with Veolia Water to discuss and coordinate this extension. In addition, we have submitted flow calculations and a will serve application to Veolia in February of 2025, which is in the process of being reviewed.

JMC and BNE originally met with the Joint Regional Sewerage Board (JRSB) on May 23rd, 2024 to review and discuss the project. Subsequently, JMC prepared a full engineering report and hydraulic analysis of the existing and proposed sanitary sewer mains for review by the JRSB. The findings of this report were presented to the JRSB at a meeting on 10/8/2026, during which it was stated that there was no objection to the connection and a willingness to serve letter would be issued. JMC and BNE met with the JRSB again on 2/2/2026 to follow up on the status of the willingness to serve letter. The willingness to serve letter was issued by the JRSB on 3/4/2026 and is included herewith for review.

III.C.9 Traffic Transportation and Parking

Comment No. 9-1

Sections III.H.4.a and III.H.4.b address the no build and build impact of the proposed action on traffic generation. However, there is no traffic generation information provided if the entire site were to be developed according to the zoning as single-family dwellings. This must be discussed.

(Appendix A-2, Rockland County Planning Department, DEIS Review Memorandum, Douglas J. Schuetz, Acting Commissioner of Planning)

Response No. 9-1

Figure 04 has been prepared to provide the density of residential development based on the existing zoning for the proposed action. The alternative provides a density of 7 single family homes on the proposed 23.86 acre project site. There is a net addition of 109, 152, 142, and 107 trips for the proposed action development as compared to the 7 single family home alternative during the peak weekday morning hour, weekday afternoon school hour, weekday roadway afternoon hour, and Saturday midday hour, respectively.

TABLE III.C.9-1
DEVELOPMENT VOLUME COMPARISON ⁽¹⁾

Description	Peak Weekday AM Hour			Peak Weekday School Hour			Peak Weekday Roadway PM Hour			Peak Saturday Midday Hour		
	Enter	Exit	Total	Enter	Exit	Total	Enter	Exit	Total	Enter	Exit	Total
a. Proposed 300 Dwelling Units Multifamily Housing Primary Volumes (ITE Code 220) ⁽²⁾	28	88	116	100	61	161	95	55	150	62	61	123
b. 7 Single-Family Detached Homes Primary Volumes (ITE Code 210) ⁽³⁾	2	5	7	6	3	9	5	3	8	9	7	16
c. Net Additional Driveway Volumes (Row c = Row a - Row b)	26	83	109	94	58	152	90	52	142	53	54	107

Notes:

- (1) Trip generation is based on Institute of Transportation Engineer (ITE) Trip Generation Manual, 11th Edition.
- (2) Multifamily Housing (Low-Rise) (ITE Code 220 is defined by ITE as including apartments, townhouses, and condominiums located within the same building with at least three other dwelling units and that have two or three floors (levels). The subject property is not close to rail transit.
- (3) Single-Family Detached Housing (ITE Code 210) is defined as any single-family detached home on an individual lot.

Comment No. 9-2

Section III.H.6 described on-site circulation and parking information but fails to provide any information about snow storage areas. We recommend that

the location of snow storage areas be illustrated as they can result in environmental impacts from the weight of the snow and salt intrusion.

(Appendix A-2, Rockland County Planning Department, DEIS Review Memorandum, Douglas J. Schuetz, Acting Commissioner of Planning)

Response No. 9-2

The site plan has been revised to indicate snow storage areas.

Comment No. 9-3

LaBella finds Section 1. Existing Roadway Inventory & Transportation Data Collection complete and accurate.

(Appendix A-7, LaBella, DEIS Traffic Technical Review, Starke W. Hipp, PE, Traffic Engineer and Frank A. Filicotto, PE Principal, Traffic Engineer)

Response No. 9-3

Comment noted.

Comment No. 9-4

Existing Volumes: LaBella finds the existing volumes to be accurate following the considerations taken into account for the detour in place during the count periods. LaBella understands that JMC will conduct additional counts of select intersections once the detour is no longer in place to validate the existing condition volumes developed for this traffic analysis that were reviewed and approved by LaBella. LaBella recommends that the following intersections be included:

- *Intersection No. 5 – Letchworth Village Road and Ridge Road*
- *Intersection No. 6 – Suffern Lane/Letchworth Village Road and Thiells-Mount Ivy Road/Hammond Road*
- *Intersection No. 12 – Thiells-Mount Ivy Road and Ridge Road*
- *Intersection No. 13 - Thiells-Mount Ivy Road and Rosman Road*

(Appendix A-7, LaBella, DEIS Traffic Technical Review, Starke W. Hipp, PE, Traffic Engineer and Frank A. Filicotto, PE Principal, Traffic Engineer)

Response No. 9-4

Comment Noted. Counts at the four noted intersections (#5, 6, 12, and 13) will be conducted upon the completion of the construction of roundabout at the intersection of County Routes 47 and 94, removal of posted detours, and while school is in session. The intersections are anticipated to be counted in the fall of 2025 and a summary will be provided under separate cover.

Comment No. 9-5

Accident Analysis: LaBella finds the Accident Analysis to be accurate. LaBella notes the following based on the analysis:

- *There were no reported collisions at the Letchworth Village Road and Ridge Road intersection. This is the location of the proposed access.*
- *At the US Route 202 and NYS Route 45/Old Country Road intersection, there was one collision involving a pedestrian with the pedestrian being outside of the designated crosswalk. The analysis also indicated a predominance of rear collisions at the intersection with descriptions including vehicles in the process of performing a right turn*

on red from the northbound NYS Route 45 approach. JMC evaluated a scenario in the Build condition that considered a right turn on red prohibition for this approach. The findings indicate that the prohibition will have deleterious impacts to the operations of the approach; however, there are safety benefits to the proposed improvement. As noted in the study, the intersection is under the jurisdiction of the NYSDOT, thus any improvements are subject to its review and approval.

- JMC conducted a signal warrant analysis for the Thiells-Mount Ivy Road and Palisades Interstate Parkway Northbound Off Ramp intersection based on MUTCD Warrant 7, Crash Experience. LaBella agrees with the findings that a signal is not warranted based on the studied warrant. JMC is proposing that Intersection Warning (W2-2) signs be installed on the Thiells-Mount Ivy Road approaches. LaBella agrees with the sign selection and location as shown by JMC. As noted in the study, the roadway is under the jurisdiction of the RCDPW, thus any improvements are subject to its review and approval.*
- The study indicated that there were two collisions involving pedestrians along Thiells-Mount Ivy Road with one resulting in a pedestrian fatality. This event occurred in proximity to the roadway's intersection with Charles Lane. As noted in the study, the proposed project will represent a marginal increase (less than 10%) in traffic along the roadway. However, it is recommended that pedestrian safety countermeasures on Thiells-Mount Ivy Road be investigated by the Village and County for the roadway in proximity to The Garden at Palisades residential development.*

(Appendix A-7, LaBella, DEIS Traffic Technical Review, Starke W. Hipp, PE, Traffic Engineer and Frank A. Filicotto, PE Principal, Traffic Engineer)

Response No. 9-5

Comment noted.

Comment noted.

Comment noted.

Comment noted.

Comment No. 9-6

Sight Distance Analysis: LaBella agrees with the sight distance analysis conducted for the Letchworth Village Road and Ridge Road intersection following the realignment of Ridge Road under the proposed conditions. The analysis indicates that there are adequate sight lines for all approaches with the intersection operating under all-way stop control, which is the existing as well as the proposed intersection control.

(Appendix A-7, LaBella, DEIS Traffic Technical Review, Starke W. Hipp, PE, Traffic Engineer and Frank A. Filicotto, PE Principal, Traffic Engineer)

Response No. 9-6

Comment noted.

Comment No. 9-7

Vehicular Trip Generation: LaBella agrees with the projected site-generated trips based on the Institute of Transportation Engineers' (ITE) Trip Generation Manual, 11th Edition, and Land Use Code (LUC) 220 – “Multifamily Housing (Low Rise)” – Not Close to Rail Transit – General Urban/Suburban.

(Appendix A-7, LaBella, DEIS Traffic Technical Review, Starke W. Hipp, PE, Traffic Engineer and Frank A. Filicotto, PE Principal, Traffic Engineer)

Response No. 9-7

Comment noted.

Comment No. 9-8

Multi-Modal Trip Generation: LaBella agrees with the projected walk trips based on LUC 220 – “Multifamily Housing (Low Rise)” – Not Close to Rail Transit – General Urban/Suburban. As noted in the study, the applicant will coordinate with North Rockland Central School District to provide a centralized school bus stop on-site as a designated area for the drop-off and pick-up of school children. Coordination with the school district as well as the drop-off and pick-up location and any accommodations (shelter, loading zone, etc.) for the drop-off and pick-up location should be provided during review of the site plan.

(Appendix A-7, LaBella, DEIS Traffic Technical Review, Starke W. Hipp, PE, Traffic Engineer and Frank A. Filicotto, PE Principal, Traffic Engineer)

Response No. 9-8

Comment noted. A bus stop with a shelter has been provided along the primary internal access driveway in the vicinity of the proposed 'Dog Run' and 'Stormwater Management Basin A'. A bus turnaround is proposed in the vicinity of the bus stop to provide convenient access to the bus stop location for an entering school bus. Figure 03 has been provided to depict the turning path of a school bus through the bus turnaround and bus stop.

Comment No. 9-9

No-Build Volumes: LaBella agrees with the +0.5% growth rate compounded annually for five (5) years to calculate background traffic volume growth. LaBella also agrees with the inclusion of the Oak Tree Apartments in the traffic forecasting.

(Appendix A-7, LaBella, DEIS Traffic Technical Review, Starke W. Hipp, PE, Traffic Engineer and Frank A. Filicotto, PE Principal, Traffic Engineer)

Response No. 9-9

Comment noted.

Comment No. 9-10

Build Volumes: LaBella agrees with the distribution of site-generated trips developed by JMC. LaBella also agrees with the findings of the Build condition operations analysis as well as the mitigation proposed by JMC to address operational and safety concerns. LaBella notes that the Build condition analysis shall be updated based on the turning movement counts collected at select intersections following the complete removal of the detour.

(Appendix A-7, LaBella, DEIS Traffic Technical Review, Starke W. Hipp, PE, Traffic Engineer and Frank A. Filicotto, PE Principal, Traffic Engineer)

Response No. 9-10

Comment noted. Modifications to the Build condition volumes will be reviewed after the completion of the additional turning movement counts as discussed in Comment No. 9-17.

Comment No. 9-11

Transportation Mitigation:

- *Intersection 4 – Letchworth Village Road and Storrs Road: LaBella agrees that the existing configuration with stop-control only on the southbound Letchworth Village Road approach is atypical and not preferred given driver expectations based on similar intersection types. JMC explored two options: A) stop-control on Storrs Road with both Letchworth Village Road approaches operating freely, B) all-way stop control.*

The operations analysis of Option A indicates that LOS for the Storrs Road will degrade from a LOS A to LOS D; however, the LOS F on the southbound Letchworth Village Road approach will be mitigated. LaBella agrees with the findings of this analysis. It should be noted that the LOS reports indicate that the queueing during the School Dismissal peak hour for the Storrs Road approach will be approximately five (5) vehicles. This amount of queueing should not obstruct the driveways of the schools located west of the intersections.

The operations analysis of Option B indicates that the approaches will operate at a LOS D or better. LaBella agrees with the findings of this analysis. It should be noted that the LOS reports indicate that the queueing during the School Dismissal peak hour for the Storrs Road approach will be approximately one (1) vehicle. This amount of queueing should not obstruct the driveways of the schools located west of the intersections.

As noted in the study, the intersection is under the joint jurisdiction of the Town of Haverstraw and RCDPW, thus any improvements are subject to their review and approval. However, the applicant is prepared to fund and install the improvements pending said approval.

(Appendix A-7, LaBella, DEIS Traffic Technical Review, Starke W. Hipp, PE, Traffic Engineer and Frank A. Filicotto, PE Principal, Traffic Engineer)

Response No. 9-11

Comment noted. The applicant has recommended the installation of Option B, an all-way stop, at the intersection of Letchworth Village Road and Storrs Road. The applicant requests input from the Town of Haverstraw on the desired option for proposed improvements at the intersection.

Comment No. 9-12

Transportation Mitigation:

- *Intersection 5 – Letchworth Village Road and Ridge Road: LaBella agrees with the proposed realignment of Ridge Road to achieve a more perpendicular approach to Letchworth Village Road. LaBella also agrees with the addition of the supplemental All-Way (R1-3P) plaques below the Stop (R1-1) signs. As noted in the study, the intersection is*

under the joint jurisdiction of the Town of Haverstraw and RCDPW, thus any improvements are subject to their review and approval. However, the applicant is prepared to fund and install the improvements pending said approval.

(Appendix A-7, LaBella, DEIS Traffic Technical Review, Starke W. Hipp, PE, Traffic Engineer and Frank A. Filicotto, PE Principal, Traffic Engineer)

Response No. 9-12

Comment noted.

Comment No. 9-13

Transportation Mitigation:

- Intersection 9 – US Route 202 and Thiells-Mount Ivy Road: JMC indicates that using the Weekday AM timing plans for the Weekday PM plan results in the overall intersection operating with less delay than the No-Build conditions. LaBella notes that the southbound Thiells-Mount Ivy Road left-turn movement currently operates at a LOS F during all study periods and the delay will be exacerbated in the No-Build and Build conditions. The delay in this movement can be attributed to the intersection being “clustered” with the US Route 202 and NYS Route 45/Old Country Road intersection to the east and priority being given to the mainline (US Route 202) movements. LaBella agrees that the timing modifications proposed by JMC will result in more favorable operating conditions. As noted in the study, the intersection is under the jurisdiction of the NYSDOT, thus any improvements are subject to its review and approval.*

(Appendix A-7, LaBella, DEIS Traffic Technical Review, Starke W. Hipp, PE, Traffic Engineer and Frank A. Filicotto, PE Principal, Traffic Engineer)

Response No. 9-13

Comment noted.

Comment No. 9-14

Transportation Mitigation:

- *Intersection 10 – US Route 202 and NYS Route 45/Old Country Road: LaBella agrees with the proposed implementation of a No Right Turn on Road for the northbound NYS Route 45 approach to address the pattern of rear end collisions identified in the Accident Analysis. As noted in the study, the intersection is under the jurisdiction of the NYSDOT, thus any improvements are subject to its review and approval. It is possible that a span wire analysis will be necessary to ensure that the existing infrastructure can accommodate the addition of the No Turn on Red (R10-11) sign as shown.*

(Appendix A-7, LaBella, DEIS Traffic Technical Review, Starke W. Hipp, PE, Traffic Engineer and Frank A. Filicotto, PE Principal, Traffic Engineer)

Response No. 9-14

Comment noted.

Comment No. 9-15

Transportation Mitigation:

- *Intersection 11 – Thiells-Mount Ivy Road and Palisades Interstate Parkway Northbound Off Ramp: As noted earlier, LaBella agrees with the findings that a signal is not warranted based on the studied warrant. JMC is proposing that Intersection Warning (MUTCD Code W2-2) signs be installed on the Thiells-Mount Ivy Road approaches. LaBella agrees with the sign selection and location as shown by JMC. As noted in the study, the roadway is under the jurisdiction of the RCDPW, thus any improvements are subject to its review and approval.*

(Appendix A-7, LaBella, DEIS Traffic Technical Review, Starke W. Hipp, PE, Traffic Engineer and Frank A. Filicotto, PE Principal, Traffic Engineer)

Response No. 9-15

Comment noted.

Comment No. 9-16

Transportation Mitigation:

- *Thiells-Mount Ivy Road: JMC proposes the installation of Advance Warning for Deer (W11-3) signs along the roadway. LaBella agrees with the installation of these signs. As noted in the study, the roadway is under the jurisdiction of the RCDPW, thus any improvements are subject to its review and approval. Furthermore, it is recommended that pedestrian safety countermeasures on Thiells-Mount Ivy Road be investigated by the Village and County for the roadway in proximity to The Garden at Palisades residential development.*

(Appendix A-7, LaBella, DEIS Traffic Technical Review, Starke W. Hipp, PE, Traffic Engineer and Frank A. Filicotto, PE Principal, Traffic Engineer)

Response No. 9-16

Comment noted.

Comment No. 9-17

Transportation Mitigation:

- *Intersection 13 – Thiells-Mount Ivy Road and Rosman Road: LaBella agrees that this intersection should be re-studied following the collection of turning movement counts with the detour removed. Mitigation should be explored if operational concerns remain evident based on that forthcoming analysis.*

(Appendix A-7, LaBella, DEIS Traffic Technical Review, Starke W. Hipp, PE, Traffic Engineer and Frank A. Filicotto, PE Principal, Traffic Engineer)

Response No. 9-17

Comment noted. The Thiells-Mount Ivy Road and Rosman Road intersection will be reviewed after the completion of the additional turning movement counts.

Comment No. 9-18

Circulation: For review of the DEIS, LaBella finds the site plan acceptable in terms of internal circulation. Approval from the appropriate fire department

and other emergency services should be provided to ensure they agree with the access and circulation plan. LaBella recommends that consideration for extending the pedestrian accommodations to the church property located to the west of the proposed roundabout.

(Appendix A-7, LaBella, DEIS Traffic Technical Review, Starke W. Hipp, PE, Traffic Engineer and Frank A. Filicotto, PE Principal, Traffic Engineer)

Response No. 9-18

The site plan has been reviewed and coordinated with the Thiells Roseville Fire District.

Pedestrian connectivity has been provided between the church property and the proposed development via additional sidewalk and marked pedestrian crossings.

Comment No. 9-19

Parking: LaBella understands that the required number of parking spaces is 2 spaces/unit, which equates to the 600 parking spaces for the proposed project. As noted by JMC, ITE data indicates that the 85th percentile peak parking demand for the proposed project is 482 spaces. The project proposes 667 parking spaces comprised of:

- 399 General Surface Spaces
- 134 Garage Spaces
- 134 Tandem (In front of Garage) Spaces

The proposed number of spaces exceeds the requirement by 67 spaces and the estimated ITE peak demand by 185 spaces. To reduce the impervious surface area of the project and increase the potential for green space, LaBella recommends that the applicant consider reducing the number of General Surface Spaces to 332.

(Appendix A-7, LaBella, DEIS Traffic Technical Review, Starke W. Hipp, PE, Traffic Engineer and Frank A. Filicotto, PE Principal, Traffic Engineer)

Response No. 9-19

The applicant is proposing to maintain the number of parking spaces that are provided. The amount of parking provided is needed based on the applicant's extensive experience constructing multi-family projects. The parking areas provide ample parking to support the residents as well as potential visitors during peak periods

Comment No. 9-20

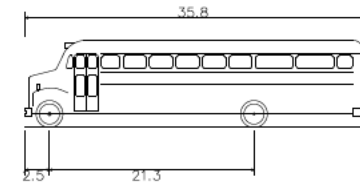
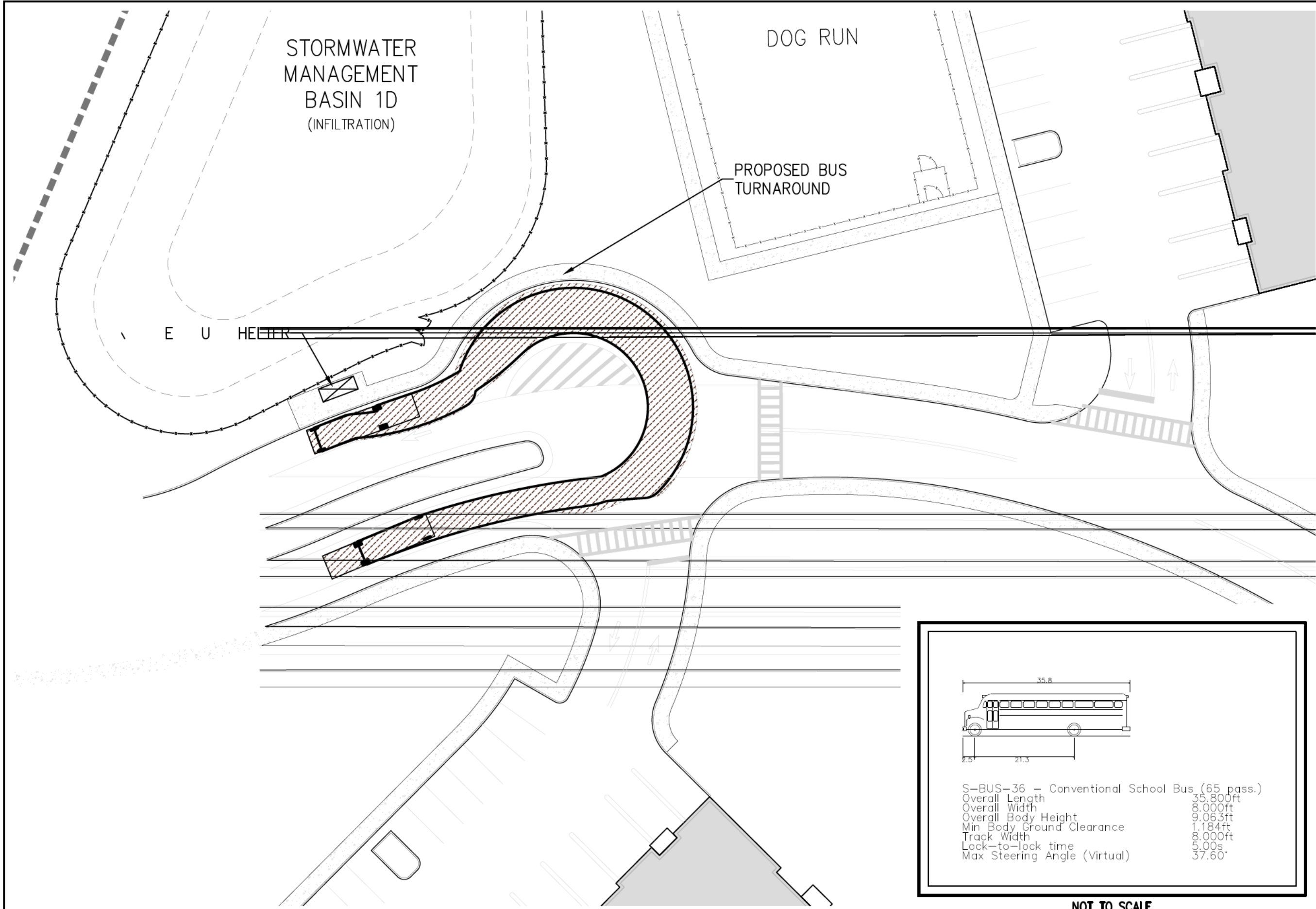
Did you do an analysis going down Letchworth Village Road to the new roundabout that's being built on that road, because that's going to be an important road?

(Appendix A-5, Town Of Haverstraw Planning Board Meeting, Public Hearing Transcript, Chairman Corallo)

Response No. 9-20

The traffic study included key intersections surrounding the site, and the scope was coordinated with the Town's traffic consultant. Now that the roundabout is fully open and all detours have been removed, the applicant will

be conducting additional traffic counts once school opens to affirm the original analysis.



S-BUS-36 - Conventional School Bus (65 pass.)
Overall Length 35.800ft
Overall Width 8.000ft
Overall Body Height 9.063ft
Min Body Ground Clearance 1.184ft
Track Width 8.000ft
Lock-to-lock time 5.00s
Max Steering Angle (Virtual) 37.60°

NOT TO SCALE

LETCHWORTH ROAD RESIDENTIAL DEVELOPMENT

HAVERSTRAW, NY

LETCHWORTH VILLAGE ROAD

SCHOOL BUS TURNING ANALYSIS

DATE: 08/15/2025

JMC PROJECT: 21090

FIGURE: 03

SCALE: 1" = 40'



120 BEDFORD RD
ARMONK
NY 10604
(914) 273-5225
fax 273-2102
JMCPLLC.COM



COPYRIGHT © 2025 by JMC. All Rights Reserved. No part of this document may be reproduced, stored in a retrieval system, or transmitted in any form or by means, electronic, mechanical, photocopying, recording or otherwise, without the prior written permission of JMC PLANNING, ENGINEERING, LANDSCAPE ARCHITECTURE & LAND SURVEYING, PLLC. JMC SITE DEVELOPMENT CONSULTANTS, LLC | JOHN MEYER CONSULTING, INC. (JMC). Any modifications or alterations to this document without the written permission of JMC shall render them invalid and unusable.

21090-TRUCK-TURNING.dwg; BUS.tab



LETCHWORTH ROAD RESIDENTIAL DEVELOPMENT
LETCHWORTH VILLAGE ROAD
HAVERSTRAW, NY

CONVENTIONAL SUBDIVISION PLAN
"PROPOSED ACTION SITE"

DATE: 08/15/2025

JMC PROJECT: 21090

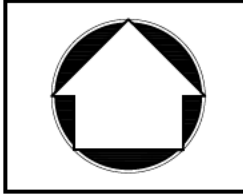
FIGURE: 04

SCALE: 1" = 150'

COPYRIGHT © 2025 by JMC. All Rights Reserved. No part of this document may be reproduced, stored in a retrieval system, or transmitted in any form or by means, electronic, mechanical, photocopying, recording or otherwise, without the prior written permission of JMC PLANNING ENGINEERING LANDSCAPE ARCHITECTURE & LAND SURVEYING, PLLC | JMC SITE DEVELOPMENT CONSULTANTS, LLC | JOHN MEYER CONSULTING, INC. (JMC). Any modifications or alterations to this document without the written permission of JMC shall render them invalid and unusable.

21090-COV-SUB.dwg; ALT-SUB FIG. tab

JMC
120 BEDFORD RD
ARMONK
NY 10504
(914) 273-5225
fax 273-2102
JMCPLLC.COM





VIEW FROM STORRS ROAD LOOKING LEFT (NORTH)

LETCHWORTH ROAD RESIDENTIAL DEVELOPMENT

LETCHWORTH VILLAGE ROAD

HAVERSTRAW, NY

PHOTO EXHIBIT

STORRS ROAD LOOKING LEFT

DATE: 05/2026

JMC PROJECT: 21090

FIGURE: P-1

SCALE: N.T.S.

120 BEDFORD RD
ARMONK
NY 10504

(914) 273-5225
fax 273-2102

JMCP LLC.COM

JMC

COPYRIGHT © 2014 by JMC All Rights Reserved. No part of this document may be reproduced, stored in a retrieval system, or transmitted in any form or by means, electronic, mechanical, photocopying, recording or otherwise, without the prior written permission of JMC PLANNING, ENGINEERING, LANDSCAPE ARCHITECTURE & LAND SURVEYING, PLLC | JMC SITE DEVELOPMENT CONSULTANTS, LLC | JOHN MEYER CONSULTING, INC. (JMC). Any modifications or alterations to this document without the written permission of JMC shall render them invalid and unusable.



VIEW FROM STORRS ROAD LOOKING RIGHT (SOUTH)

LETCHWORTH ROAD RESIDENTIAL DEVELOPMENT

LETCHWORTH VILLAGE ROAD

HAVERSTRAW, NY

PHOTO EXHIBIT

STORRS ROAD LOOKING RIGHT

DATE: 05/2026

JMC PROJECT: 21090

FIGURE: P-2

SCALE: N.T.S.

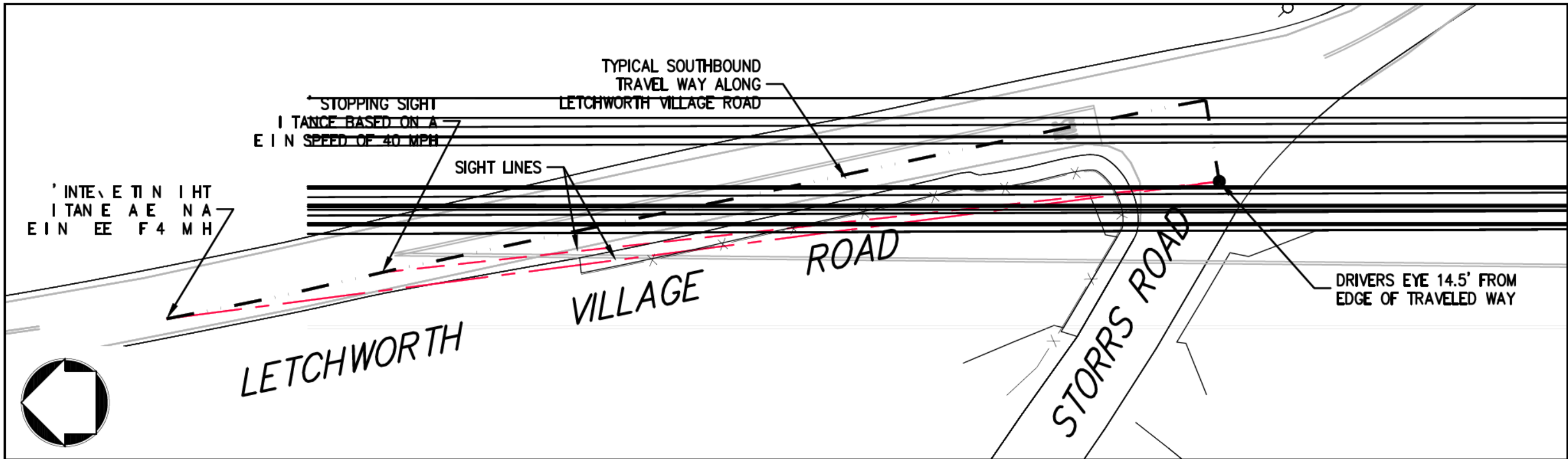
120 BEDFORD RD
ARMONK
NY 10504

(914) 273-5225
fax 273-2102

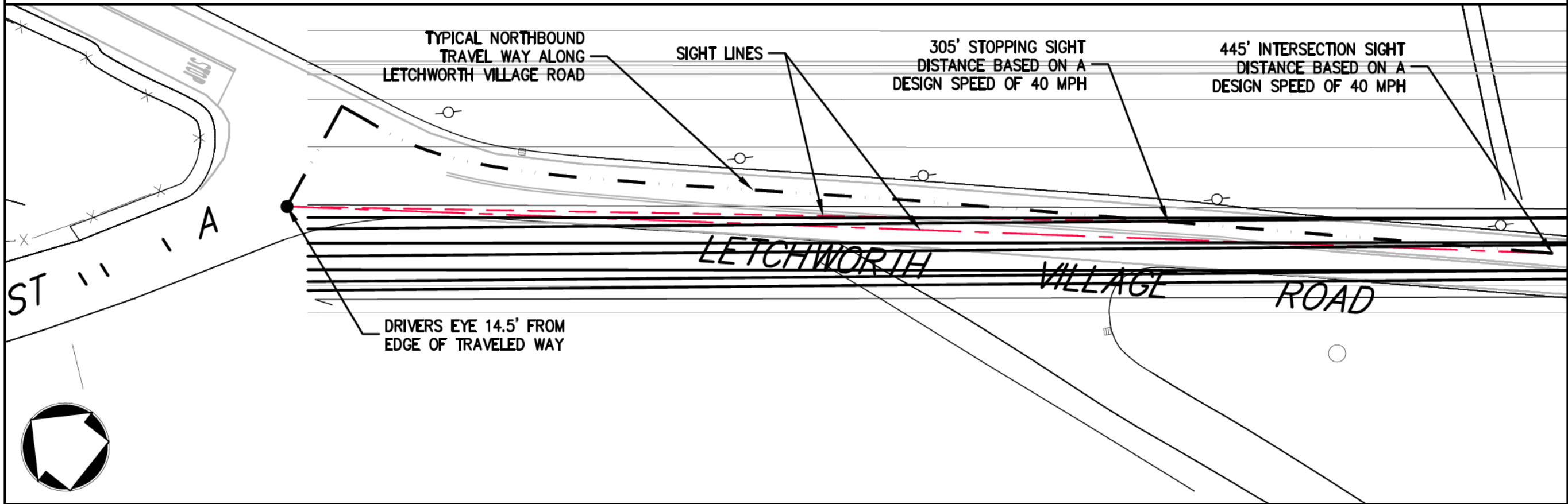
JMCPLLC.COM

JMC

COPYRIGHT © 2014 by JMC All Rights Reserved. No part of this document may be reproduced, stored in a retrieval system, or transmitted in any form or by means, electronic, mechanical, photocopying, recording or otherwise, without the prior written permission of JMC PLANNING, ENGINEERING, LANDSCAPE ARCHITECTURE & LAND SURVEYING, PLLC | JMC SITE DEVELOPMENT CONSULTANTS, LLC | JOHN MEYER CONSULTING, INC. (JMC). Any modifications or alterations to this document without the written permission of JMC shall render them invalid and unusable.



RIGHT TURN FROM STOP (LOOKING LEFT)



LEFT TURN FROM STOP (LOOKING RIGHT)

JMC

120 BEDFORD RD
ARMONK
NY 10604
(914) 273-5225
fax 273-2102
JMCPLLC.COM

LETCHWORTH ROAD RESIDENTIAL DEVELOPMENT
HAVERSTRAW, NY

SIGHT DISTANCE

DATE: 05/2026

JMC PROJECT: 21090

FIGURE: SD-1

SCALE: 1" = 40'

III.C.10 Community Demographics, Facilities and Services

Comment No. 10-1

Lack of Analysis on Required Additional Services and Personnel

Although the DEIS adequately describes existing Community Demographics, Facilities, and Services and estimates the number of new residents (739) and school-age children (approximately 33), it does not sufficiently address whether additional municipal services, personnel, or resources would be required to support the projected population increase.

The narrative asserts that police, fire, and ambulance services are "robust," but provides no quantitative capacity analysis, operational benchmarks, or discussion of potential service strain, particularly at full build-out.

(Appendix A-1, Kauker & Kauker, LLC, DEIS Review Memorandum, Michael D. Kauker, PP, AICP)

Response No. 10-1

The DEIS states that the proposed project estimates a $\pm 1.9\%$ in Town population increase. The NYS ED data website provides data of the total student enrollment over many years. The DEIS shows that the student enrollment in the North Rockland Schools has decreased over the last 10 years approximately $\pm 3.6\%$. With the additional students projected with this proposal, it is identified that additional classroom may not be necessary, based on the recent decline in enrollment over the last 10 years. The School District provided us with the maximum capacity of each individual school building in the North Rockland CSD and none of the schools are at or near their capacity limitations, as provided in the DEIS.

The Town services' budgets and personnel were previously provided in the DEIS. The DEIS states the current number of employees in the various service departments and was provided to us by these department chiefs (Police, Fire, and Ambulance Corp). In addition, we have been in communication with the Town's Director of Finance, who has stated that there will be no additional demand on these services.

Comment No. 10-2

Fire Apparatus and Emergency Response Capabilities

The DEIS includes a fire truck turning plan, yet it does not evaluate whether the number, type, and capacity of existing fire apparatus are sufficient to meet the specific needs of the proposed development-particularly a 3.5-story, multifamily apartment complex with garages underneath.

There is no verification of compliance with National Fire Protection Association (NFP A) standards or any formal consultation with the local fire district regarding specialized equipment requirements (e.g., ladder trucks, high-capacity pumps).

(Appendix A-1, Kauker & Kauker, LLC, DEIS Review Memorandum, Michael D. Kauker, PP, AICP)

Figure III-I.1 Fire Truck Turning Plan does not depict the pathway a fire truck will take into the site from the proposed emergency access road. This drawing must be amended to include this path.

(Appendix A-2, Rockland County Planning Department, DEIS Review Memorandum, Douglas J. Schuetz, Acting Commissioner of Planning)

Response No. 10-2

The project sponsor met with the Fire Chief and Assistant Chiefs of the Theills Roseville Fire District on March 5, 2025. The fire truck turning plan was discussed at that time. We then provided a revised Fire Truck Turning Plan for the Department's review to address their concerns and confirm it is to the Department's satisfaction.

The Fire District did not express a need for additional fire apparatus or equipment to serve the proposed action. The proposed action will be constructed in accordance with all applicable NFPA / NYS Fire Codes.

Comment No. 10-3

Over-Reliance on Broad Assumptions Regarding School Enrollment

The DEIS references a downward trend in enrollment in the North Rockland Central School District and suggests minimal impact. However, it does not present official projections from the School District, nor does it evaluate cumulative impacts if additional nearby developments are approved.

There is also no analysis of classroom utilization rates, potential capital improvements, or school bus routing implications.

(Appendix A-1, Kauker & Kauker, LLC, DEIS Review Memorandum, Michael D. Kauker, PP, AICP)

Response No. 10-3

The School District provided us with the maximum capacity for each school building in the North Rockland CSD. As shown in the DEIS, the two

elementary schools in the vicinity, Farley Elementary and Willow Grove Elementary have capacities of 24% and 28%, respectfully. Farley Elementary enrolled 499 students in the 2023 -2024 school year and has a maximum capacity of 2,100. Willow Grove Elementary enrolled 568 students in the 2023-2024 school year and has a maximum capacity of 2,000. Given the number of school children anticipated to be generated by the project (33) and the available capacity in existing schools, there is no basis for assuming that additional capital improvements will be needed.

As far as classroom utilization rates & potential capital improvements, the DEIS Scoping document approved by the Lead Agency did not identify nor require an analysis for these matters concerning additional school enrollment.

Comment No. 10-4

Limited Discussion of Broader Community Facilities Impacts

While recreational amenities are proposed on-site, the DEIS does not evaluate potential secondary impacts on nearby public parks, libraries, or other public facilities from the increased population.

(Appendix A-1, Kauker & Kauker, LLC, DEIS Review Memorandum, Michael D. Kauker, PP, AICP)

Response No. 10-4

The recreational amenities proposed on the site are for residents and their guests. The proposed amenities on the project site will not be for public use.

The small increase in population to be generated by the project, spread over on-site and off-site recreation areas, should have a negligible impact on off-

site areas. Additionally, the applicant will be paying a fee in lieu of land for any necessary acquisition or capital improvements to Town parks.

Comment No. 10-5

“The Town professional staff and the various Boards that serve the Town have communicated that they envision a multi-family dwelling communicate as a great asset for the Town and in this specific area of Haverstraw.” (P. III.I-1). There does not seem to be a basis for this broad and definitive statement as the environmental and land use review is still ongoing.

(Appendix A-3, Silverberg Zalantis, LLC, DEIS Review Memorandum, Christie Addona, Town Land Use and Zoning Attorney)

Response No. 10-5

The comment is noted. The Town of Haverstraw Master Plan 2000 and the Town of Haverstraw Urban Renewal Plan of 2001 both cite the property and surrounding area as a region in the Town which is ripe for community and/or economic development. The Rockland County Comprehensive Plan of 2011 cites a specific recommendation for the project site as a property in need of revitalization and repurposing, as highlighted in the DEIS.

In addition, the 2024 Rockland County Housing Needs Assessment specifically states that this type of housing is needed in the County.

Comment No. 10-6

What is the analysis for how an additional 739 residents in 300 dwelling units would result in 33 school-aged children? (P.III.I-8-9).

(Appendix A-3, Silverberg Zalantis, LLC, DEIS Review Memorandum, Christie Addona, Town Land Use and Zoning Attorney)

Response No. 10-6

As identified in the DEIS, The 2018 Rutgers for Urban Policy Research Report "Who Lives in New Jersey Housing" was utilized for the population and school children projections for this proposed action.

III.C.11 Fiscal and Economic Conditions

Comment No. 11-1

Fiscal and Economic Conditions should indicate whether the other taxing jurisdictions, namely the School District, have consented to the Applicant's proposed PILOT program. The Applicant should also provide an estimated breakdown of how much of the PILOT each taxing jurisdiction will receive per year during the 15-year PILOT period.

(Appendix A-3, Silverberg Zalantis, LLC, DEIS Review Memorandum, Christie Addona, Town Land Use and Zoning Attorney)

Response No. 11-1

At this time, the Applicant and the North Rockland School District have not yet agreed to a PILOT schedule. Discussions are ongoing.

Below is a breakdown based on the PILOT schedule contained in the purchase and sale agreement between the Applicant and the Town, using the proportional tax distribution reported from Harbors at Haverstraw, another multi-family project located in the Town of Haverstraw.

TABLE III.C.11-1
ORIGINAL PILOT PROPOSAL

	Town	School	County
Proportions (per Harbors at Haverstraw)	31%	64%	5%

<u>Year</u>	<u>Formula</u>	<u>Total Payment</u>	<u>Town Payment</u>	<u>School Payment</u>	<u>County Payment</u>
1	Flat rate for entire parcel	\$75,000		\$48,000	\$3,750
2	Flat rate for entire parcel	\$75,000		\$48,000	\$3,750
3	Flat rate for entire parcel	\$75,000		\$48,000	\$3,750
4	Base Value X # units X (1/3)	\$384,000		\$245,760	\$19,200
5	Base Value X # units X (1/3)	\$384,000		\$245,760	\$19,200
6	Base Value X # units X (2/3)	\$768,000		\$491,520	\$38,400
7	Base Value X # units X (2/3)	\$768,000		\$491,520	\$38,400
8	Base Value X # units	\$1,152,000	\$357,120	\$737,280	\$57,600
9	Base Value X # units	\$1,152,000	\$357,120	\$737,280	\$57,600
10	Base Value X # units	\$1,152,000	\$357,120	\$737,280	\$57,600
11	Base Value X # units	\$1,152,000	\$357,120	\$737,280	\$57,600
12	Base Value X # units	\$1,152,000	\$357,120	\$737,280	\$57,600
13	Base Value X # units	\$1,152,000	\$357,120	\$737,280	\$57,600
14	Base Value X # units	\$1,152,000	\$357,120	\$737,280	\$57,600
15	Base Value X # units	\$1,152,000	\$357,120	\$737,280	\$57,600
16+	Market Value Assessment				
	PILOT Totals Over Time	\$11,745,000	\$3,640,950	\$7,516,800	\$587,250

Comment No. 11-2

The analysis of impacts on community services (p. III.J-3-5) and proposed mitigation (p.III.J-6-7) must be expanded. There is no analysis of how the estimated per capita costs will be mitigated by the PILOT. And the generalized statement that “[a] more accurate comparator would be the marginal cost of providing services for each new resident, but that computation is too complex for this purpose” is insufficient to demonstrate mitigation of impacts.

(Appendix A-3, Silverberg Zalantis, LLC, DEIS Review Memorandum, Christie Addona, Town Land Use and Zoning Attorney)

Response No. 11-2

On July 1, 2025, the project team had discussions with the Town Director of Finance.

Both the Fire Department and the Ambulance Corp are volunteer organizations, therefore no additional budgeting would be necessary for either of these service departments.

Based on the Proposed Action Plans, it was determined that the Town would not require additional resources or have to increase the budget for the Police Department.

The Proposed Action proposes private roads. Therefore, the Town DPW would not maintain the roadways associated with this development.

It has been determined that no increases in the Town Budget for these services would be necessary to accommodate the Proposed Action.

III.C.12 Noise and Air Quality

Comment No. 12-1

The discussion on air quality is lacking. While it is acknowledged that standards for ozone levels are “occasionally” exceeded, the DEIS fails to recognize that all of Rockland County is a non-attainment area for 8-Hour Ozone (2015). Ground-level ozone, caused by the chemical reaction of oxides of nitrogen and volatile organic compounds, is harmful to human health and the environment. One of the sources of these pollutants are motor vehicles. Potential air quality impacts caused by an increase in traffic should be thoroughly assessed and specific mitigation measures implemented to make sure the increase in automobile use does not result in exacerbating the ozone problem. The project should be consistent with regulatory efforts to reduce ozone levels.

(Appendix A-2, Rockland County Planning Department, DEIS Review Memorandum, Douglas J. Schuetz, Acting Commissioner of Planning)

Response No. 12-1

It is acknowledged that all of Rockland County is a non-attainment area for 8-Hour Ozone. A traffic study was prepared and submitted to address the traffic increase associated with the proposed action which includes projected vehicle trips during peak hours for weekdays and weekend days. The traffic study proposes several improvements which will ensure adequate levels of service and reduce congestion, which mitigates any potential increase in ozone levels. In addition, the landscape plans submitted suggest native trees and shrubs to be incorporated into the site plans to address any potential air quality impacts.

III.C.13 Historic and Cultural Resources

Comment No. 13-1

The DEIS notes that the State Historic Preservation Office (SHPO) has issued an initial response requesting additional information, including Phase INIB archaeological surveys, visual analyses, and landscape screening drawings. However, the DEIS does not confirm whether the applicant has since submitted this requested documentation, nor does it evaluate the findings or their potential implications on project design or mitigation strategies.

The Final Environmental Impact Statement (FEIS) should include all materials submitted to SHPO in response to their request. This includes:

Completed Phase INIB archaeological surveys and any associated findings.

Supplemental visual impact assessments as requested.

Landscape screening plans that address SHPO's concerns regarding the visual context of any historic resources.

Additionally, the FEIS should document any follow-up correspondence from SHPO, including final determinations, conditions, or additional mitigation measures required. If the applicant has not yet submitted the requested materials, the FEIS should outline a timeline and process for compliance to ensure that historic and cultural resource protections are addressed prior to project approvals.

(Appendix A-1, Kauker & Kauker, LLC, DEIS Review Memorandum, Michael D. Kauker, PP, AICP)

Response No. 13-1

We made a submission on July 9th, 2025, in response the two SHPO letters received and dated December 20th, 2024.

We submitted the following documents to address the comments from the NYSOPRHP:

1. A Site Identification Phase 1B Archeological Survey
2. Building Elevations of both residential building types and the proposed clubhouse building
3. A Preliminary Site Layout Plan that shows the landscaping and the planting schedule that shows the species and their placement on the plan
4. Architectural Concept Site Photos that provide visuals of the proposed development from specific points around the project site, including from CrossLife Church, Letchworth Village Road, and Hammond Road.

Any and all follow-up correspondence from SHPO will be submitted to the Lead Agency for their record and review, including the final determination.

Comment No. 13-2

Confirmation regarding the cultural and archaeological significance of the site should be obtained from the New York State Historic Preservation Office (SHPO) before the DEIS is finalized. The DEIS indicates the New York State

Office of Parks, Recreation, and Historic Preservation is also known as SHPO. This is not completely correct and should be changed. SHPO is part of OPRHP.

(Appendix A-2, Rockland County Planning Department, DEIS Review Memorandum, Douglas J. Schuetz, Acting Commissioner of Planning)

Response No. 13-2

The final determinations on cultural and archeological significance will be submitted to the Lead Agency for their record and review.

The comment is noted. The FEIS notes that SHPO is a part of the NYSOPRHP.

Comment No. 13-3

Provide all communications to and responses from SHPO. There must be a definitive communication from SHPO as part of the SEQRA process regarding their perspective on the Proposed Action.

(Appendix A-3, Silverberg Zalantis, LLC, DEIS Review Memorandum, Christie Addona, Town Land Use and Zoning Attorney)

Response No. 13-3

The comment is noted. Any and all follow-up correspondence from SHPO will be submitted to the Lead Agency for their record and review, including the final determination.

Comment No. 13-4

Where are the historically eligible structures and four areas with historic and archeological sensitivity in relation to the project site?

(Appendix A-3, Silverberg Zalantis, LLC, DEIS Review Memorandum, Christie Addona, Town Land Use and Zoning Attorney)

Response No. 13-4

All of the buildings on the existing 154.5 acre lot are associated with the Letchworth Village Historic District. This is identified by SHPO as USN Number 08702.000481.

The four areas with historic and archeological sensitivity are not located within the ±23.86 acre project site. Three of the four areas are located along Willow Grove North at the northern portion of the existing 154.5 acre parcel. The fourth and final area of sensitivity is located on the south side of Letchworth Village Road along both the east and west sides of Ridge Road, to the south of the ±23.86 acre project site.

Comment No. 13-5

Where are the historically eligible structures and four areas with historic and archeological sensitivity in relation to the project site?

(Appendix A-3, Silverberg Zalantis, LLC, DEIS Review Memorandum, Christie Addona, Town Land Use and Zoning Attorney)

Response No. 13-5

All of the buildings on the existing 154.5 acre lot are associated with the Letchworth Village Historic District. This is identified by SHPO as USN Number 08702.000481.

The four areas with historic and archeological sensitivity are not located within the ±23.86 acre project site. Three of the four areas are located along Willow Grove North at the northern portion of the existing 154.5 acre parcel. The fourth and final area of sensitivity is located on the south side of Letchworth Village Road along both the east and west sides of Ridge Road, to the south of the ±23.86 acre project site.

III.C.14 Construction

Comment No. 14-1

The project states it will be a single-phase construction. As a result of the size and impacts of the construction, further soil erosion methods must be deployed such as sedimentation areas/basins, construction ditches, diversions, etc. Note that infiltration practices cannot be used for sedimentation storage or be impacted by material storage or soil staging. A construction plan shall be fully developed to deploy runoff diversion and sediment entrapment to mitigate impacts to those locations as well as offsite runoff impacts associated with the reduction in ground cover/vegetation.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 14-1

A construction phasing plan has been provided in the drawing set. The project is now proposed to be constructed and broken down into 4 different construction phases. The phase plans highlight specific notes for each phase that display runoff diversion. The stormwater drainage and detention basins are all to be constructed in phases 1A and 1B, as noted in the construction phasing plan. The 4 phases are noted as 1A, 1B, 2, & 3.

Comment No. 14-2

Impacts for earthwork disturbance levels should be further evaluated as identified above in 111.C.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 14-2

The revised cut and fill volumes have been created for the various materials present on site and Figure III.C-4 has been updated. The updated analysis results in a ±62,570 sf (Cut), ±96,470 sf (Fill), and ±33,900 sf (Net Fill).

Comment No. 14-3

Site safety and security will be a factor since the Letchworth property will continue to be an active recreational area and the church property will continue to operate. A full site safety plan must be prepared and presented.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 14-3

During construction, there will be a security gate installed at the site entry which will be locked after hours. The job trailer, which is the office for the field team, will be located near the site entry within the gated area. Additional security measure will include cameras, lighting, and overnight monitoring. To help control dust/dirt leaving the site during working hours, there will be washdown station at the entry for construction vehicles to use prior to leaving the site. A site safety plan will be provided and we will engage a 3rd party site safety inspector.

Comment No. 14-4

Offsite work may be required within the public roadway system for sewer and water (at a minimum). Appropriate traffic control plans must be prepared to address traffic impacts during construction. Note that the sequencing of major earthwork operations, material import/export shall be avoided during any significant traffic impacts offsite to avoid additional traffic delays.

(Appendix A-6, Civil Design Works, LLC, DEIS Review Memorandum, Glenn McCreedy)

Response No. 14-4

Traffic control plans will be prepared as required during the applicable County permitting process.

Comment No. 14-5

Is the Applicant intending to hire local contractors and construction workers when possible?

(Appendix A-3, Silverberg Zalantis, LLC, DEIS Review Memorandum, Christie Addona, Town Land Use and Zoning Attorney)

Response No. 14-5

The Applicant will endeavor to hire local contractors and construction workers where and when possible.

Comment No. 14-6

And then also a big one was actually the impact to the existing parking lot by the overall construction, construction vehicles. You know, as much as we could say you're going to avoid it as much as possible, the parking lot's there, it's a big parking lot. I drive trucks, I've driven trucks. You know, tractor-trailers are going to be pulling in and out, dump trucks are going to be pulling in and out, they're going to be turning around in there, it's an easy enough parking lot to whip trucks around in. So it's going to get beat up. It's not in the best of condition right now. So how can we address those concerns?

(Appendix A-5, Town Of Haverstraw Planning Board Meeting, Public Hearing Transcript, Jose Castro, Representative of CrossLife Church)

Response No. 14-6

Construction vehicles will not drive on the Church parking lot / property.

III.C.15 Significant Adverse Environmental Impacts that Cannot be Avoided

There are no comments for this chapter.

III.C.16 Alternatives

There are no comments for this chapter.

III.C.17 Irreversible and Irretrievable Commitment of Resources

There are no comments for this chapter.

III.C.18 Growth Inducing Aspects

There are no comments for this chapter.

III.C.19 Effects on the Use and Conservation of Energy Resources

Comment No. 19-1

While the DEIS indicates that the proposed action is not anticipated to result in significant adverse impacts to utilities, it is recommended that a more thorough assessment be conducted regarding water, wastewater, electricity and fossil fuels, be conducted, particularly an energy assessment, its impact on the local utility infrastructure, as well as a greenhouse gas emissions analysis. Mitigation measures should include a full evaluation of the potential use of renewable energy sources such as solar, as well as electric vehicle charging infrastructure.

(Appendix A-2, Rockland County Planning Department, DEIS Review Memorandum, Douglas J. Schuetz, Acting Commissioner of Planning)

Response No. 19-1

The project team has had discussions with the utility companies that would serve the proposed action. There are no concerns of significant impacts on the existing utility infrastructure or any concern for any capacity limit from the utility companies.

Comment No. 19-2

As part of the evaluation of energy impacts, we encourage the completion of a greenhouse gas (GHG) emissions inventory of the proposed action. This analysis should include both building and transportation related GHG emissions as well as the loss of mature trees and the associated carbon storage, as referenced in Comment 9. Additionally, the analysis should include a thorough review of energy measures to reduce GHG emissions

such as the use of passive building principles, clean heating and cooling alternatives like air or ground source heat pumps, the use of renewable energy such as solar panels, and the installation of EV charging stations.

(Appendix A-2, Rockland County Planning Department, DEIS Review Memorandum, Douglas J. Schuetz, Acting Commissioner of Planning)

Response No. 19-2

A traffic analysis has been submitted for the Town to review, and identifies the limited additional congestion the proposed action will add to the roadway network. Additionally, regarding tree removals and proposed plantings, a landscape plan was provided to the Lead Agency. All proposed plantings are native to the County of Rockland and the lower Hudson Valley region. Additionally, each residential garage will have an EV charging adapter, for residents to utilize at home EV charging abilities.

Comment No. 19-3

It is stated that the proposed action will not be designed to meet LEED Certification standards as it does not meet the goals of the applicant. This department urges the Town to ensure that applicants consider complete electrification of proposed housing and utilize energy conservation building features such as energy efficient air conditioning equipment and lighting fixtures. Renewable energy options, such as the use of solar panels, should also be considered not only for electricity, but also for heating and cooling to help meet the State's Climate Act goals of reducing greenhouse gas emissions.

(Appendix A-2, Rockland County Planning Department, DEIS Review Memorandum, Douglas J. Schuetz, Acting Commissioner of Planning)

Response No. 19-3

The comment is noted.