



Site Planning
Civil Engineering
Landscape Architecture
Land Surveying
Transportation Engineering

Environmental Studies
Entitlements
Construction Services
3D Visualization
Laser Scanning

May 15, 2026

Chairman Corallo and Members of the Planning Board
Town of Haverstraw
1 Rosman Road
Garnerville, New York 10923

RE: JMC Project 21090
Letchworth Road Residential Development
Letchworth Village Road
Town of Haverstraw, NY

Dear Chairman Corallo and Members of the Planning Board:

As discussed with the Board at the May 13, 2026 meeting, we have revised the Traffic Transportation and Parking Section of the FEIS in accordance with the latest LaBella FEIS Traffic comments. In addition, we have revised the Water Supply and Sanitary Sewerage Section to correct any typos. Enclosed are the FEIS sections reflecting the updated information.

Given this, we submit that the FEIS is complete and respectfully request that your Board accept the document as complete at the June 10th meeting.

Should you have any questions, please do not hesitate to contact us at (914) 273-5225.

Sincerely,

JMC Planning Engineering Landscape Architecture & Land Surveying, PLLC

Paul Dumont

Paul Dumont, PE
Project Manager

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

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.

Comment No. 9-21

As requested in LaBella's Traffic Review #2, JMC conducted additional counts at the recommended intersections following the completion of the roundabout and removal of the associated detour. The weekday counts were conducted while schools were in regular session. LaBella agrees with JMC's conclusions that the most recent traffic count data showing volumes lower than the estimated volumes utilized in the analysis for the DEIS provided conservative results; thus, no revisions to the analysis are necessary.

(Appendix A-8, LaBella, Traffic Review #3 - FEIS Traffic Technical Review, Starke W. Hipp, PE, Traffic Engineer and Frank A. Filicotto, PE Principal, Traffic Engineer)

Response No. 9-21

Comment noted.

Comment No. 9-22

Since the completion of the DEIS and LaBella's technical review of the traffic study therein, the Institute of Transportation Engineers (ITE) has published the 12th Edition of its Trip Generation Manual. Table 1 compares the trip generation for the proposed project based on the 11th Edition and 12th Edition datasets.

Table 1 – Comparison of Peak Hour Trip Generation ITE 11th Edition vs 12th Edition

Edition	Weekday AM Peak Hour			Weekday School Peak Hour			Weekday PM Peak Hour			Saturday Peak Hour		
	Enter	Exit	Total	Enter	Exit	Total	Enter	Exit	Total	Enter	Exit	Total
11 th	28	88	116	100	61	161	95	55	150	62	61	123
12 th	28	90	118	111	74	185	94	57	151	56	91	147
Delta	0	+2	+2	+11	+13	+24	-1	+2	+1	-6	+30	+24

As shown in Table 1, the volume of site-generated trips is similar in the weekday AM and weekday PM peak hours between the 11th and 12th Editions, while the volume of site-generated trips is higher in the weekday school peak hour and Saturday peak hour. In this situation LaBella would typically recommend that the analysis be updated for the weekday school and Saturday peak hours; however, the recently collected data indicates that traffic volumes are lower than previously modeled indicating that the analysis contained in the DEIS was conservative and these additional site-generated trips will not result in additional impacts.

(Appendix A-8, LaBella, Traffic Review #3 - FEIS Traffic Technical Review, Starke W. Hipp, PE, Traffic Engineer and Frank A. Filicotto, PE Principal, Traffic Engineer)

Response No. 9-22

Comment noted.

Comment No. 9-23

In Response No. 9-11, JMC states that the applicant has recommended the installation of Option B, an all-way stop, at the intersection of Letchworth Village Road and Storrs Road. JMC requests input from the Town of Haverstraw on the desired option for proposed improvements at the intersection.

For the Board's edification, Option A consisted of stop-control on Storrs Road with both Letchworth Village Road approaches operating freely. Both options result in more favorable levels of service in comparison to the existing conditions as well as a more typical intersection configuration in comparison to the existing conditions. As detailed in the DEIS prepared by JMC, dated February 28, 2025, the warrant criteria provided in the Manual on Uniform Traffic Control Devices (MUTCD) for implementing an all-way stop control were either not met or required additional studies, such as the evaluation of the available sight distances for the Storrs Road approach. It is recommended that JMC conduct the sight distance evaluation and the results provided for review prior to the Town opining on its preferred option.

Finally, as noted in the DEIS and LaBella's prior comment letter, the intersection is also under the jurisdiction of Rockland County Department of Public Works (RCDPW); thus, any improvements are subject to their review and approval.

(Appendix A-8, LaBella, Traffic Review #3 - FEIS Traffic Technical Review, Starke W. Hipp, PE, Traffic Engineer and Frank A. Filicotto, PE Principal, Traffic Engineer)

Response No. 9-23

Due to the existing vegetation within the northwest corner of the intersection, the sight distance for vehicles turning from Storrs Road under Option A has been reviewed.

Letchworth Village Road has a posted speed limit of 30. To provide a conservative analysis, a 40 mph design speed was utilized for vehicles traveling in both directions along South Broadway.

Using the design speed mentioned above, the desired intersection and stopping sight distances were calculated based on methodologies from American Association of State Highway and Transportation Officials (AASHTO) "A Policy on Geometric Design of Highways and Streets", latest edition. The sight distances as well as approximate available sight distances are summarized in the table below:

Description	Desirable Stopping Sight Distance	Desirable Intersection Sight Distance	Approximate Available Sight Distance
Left Turn from Driveway (Looking Right)	305 feet	445 feet	650 feet
Right Turn from Driveway (Looking Left)	305 feet	385 feet	1,000 feet

As indicated in the table above, the desirable stopping and intersection sight distances are accommodated for vehicles exiting from Storrs Road with the approximate available sight distance noted as exceeding the stopping and intersection sight values. Figure SD-1 has been prepared to plot the stopping sight distance and intersection sight distance on the existing roadways.

Additionally, photo exhibits (Figures P-1 and P-2) have been prepared to provide the view looking left and right from Storrs Road at a location 14.5 feet from the edge of traveled way along Letchworth Village Road. It should be noted that there is a railing adjacent to the sidewalk in the northwest corner of the intersection. As shown on Figure P-1, the railing does not visually impede the sight distance looking north due to the existing openings within the railing.

Comment No. 9-24

An analysis of the Thiells-Mount Ivy Road and Rosman Road intersection that was based on observed turning movement counts in lieu of estimated counts as done in the DEIS, indicates that the intersection will continue to operate at a Build level of service commensurate with the No-Build level of service. The analysis indicates that the approaches will not operate below a LOS E and the V/C ratios indicate that the approaches are operating with capacity. LaBella agrees with JMC's conclusion that mitigation is not necessary at this intersection.

(Appendix A-8, LaBella, Traffic Review #3 - FEIS Traffic Technical Review, Starke W. Hipp, PE, Traffic Engineer and Frank A. Filicotto, PE Principal, Traffic Engineer)

Response No. 9-24

Comment noted.

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 10/8/2025, 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.



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.

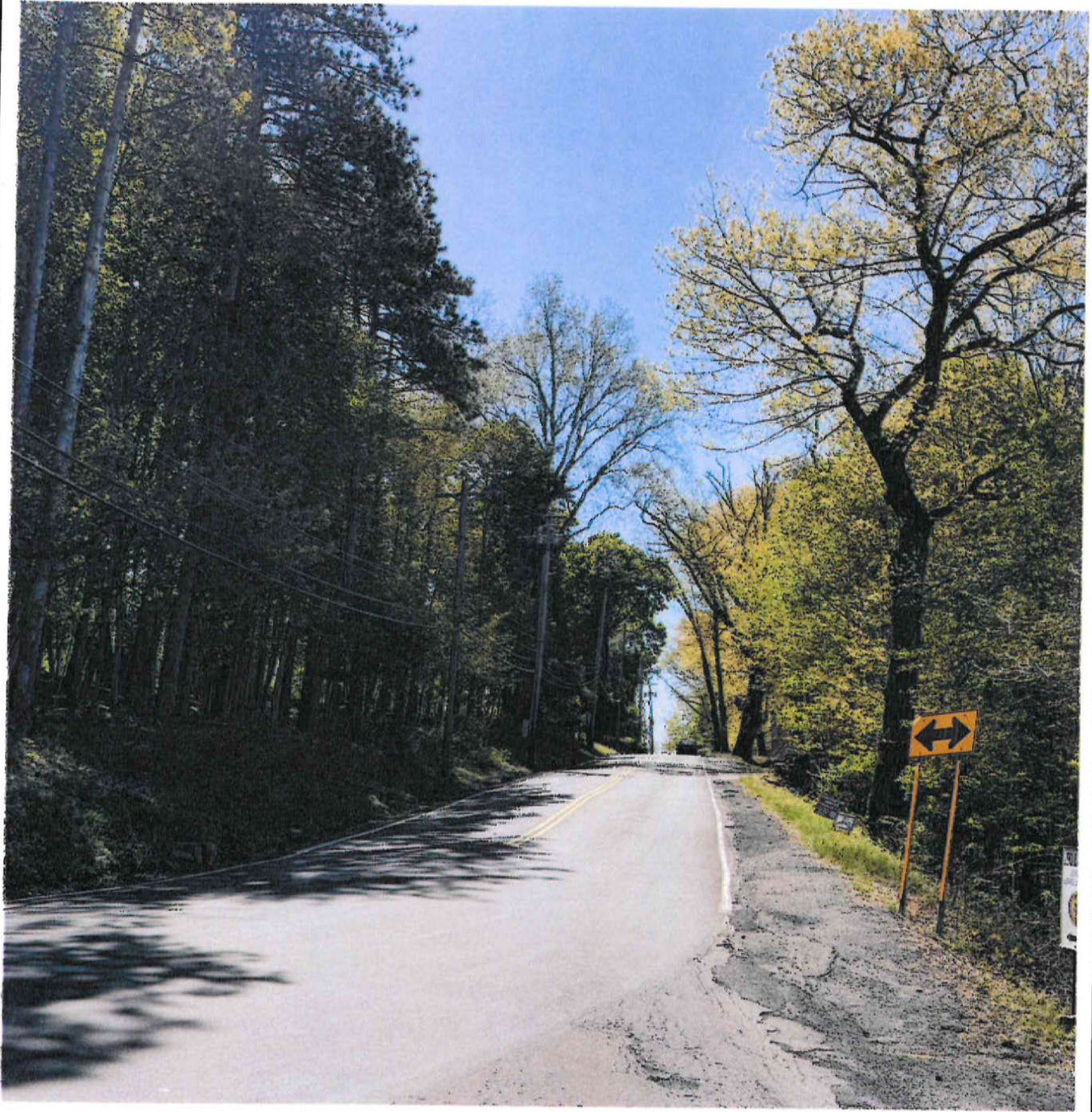
120 BEDFORD RD
 ARMONK
 NY 10504

(914) 273-5225
 fax 273-2102

JMCP LLC.COM



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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

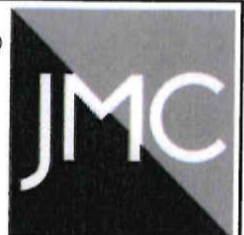
FIGURE: P-2

SCALE: N.T.S.

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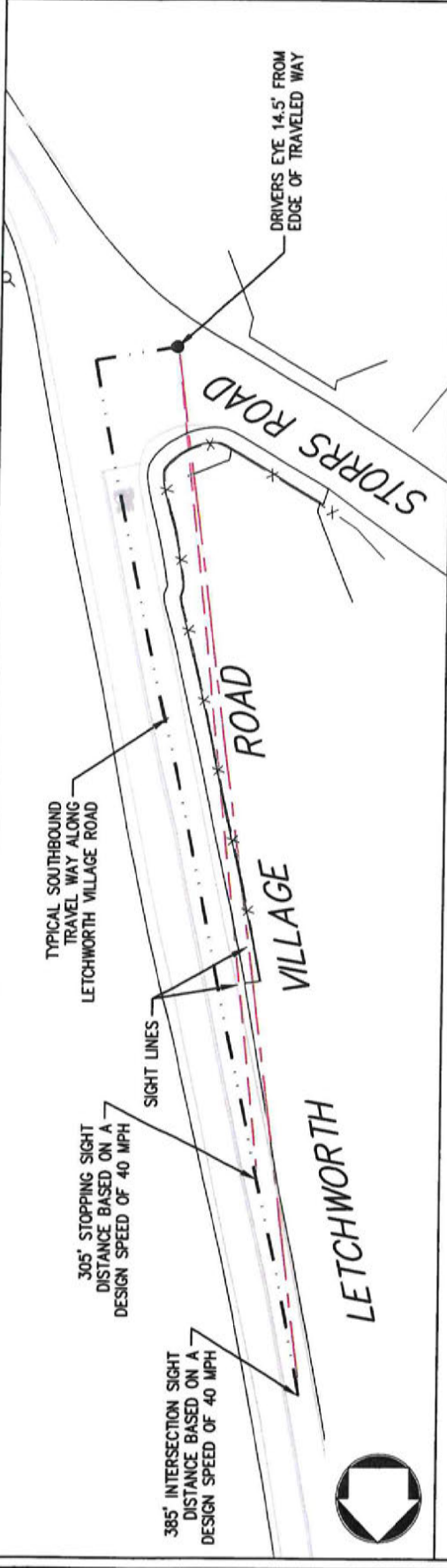


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fax 273-2102
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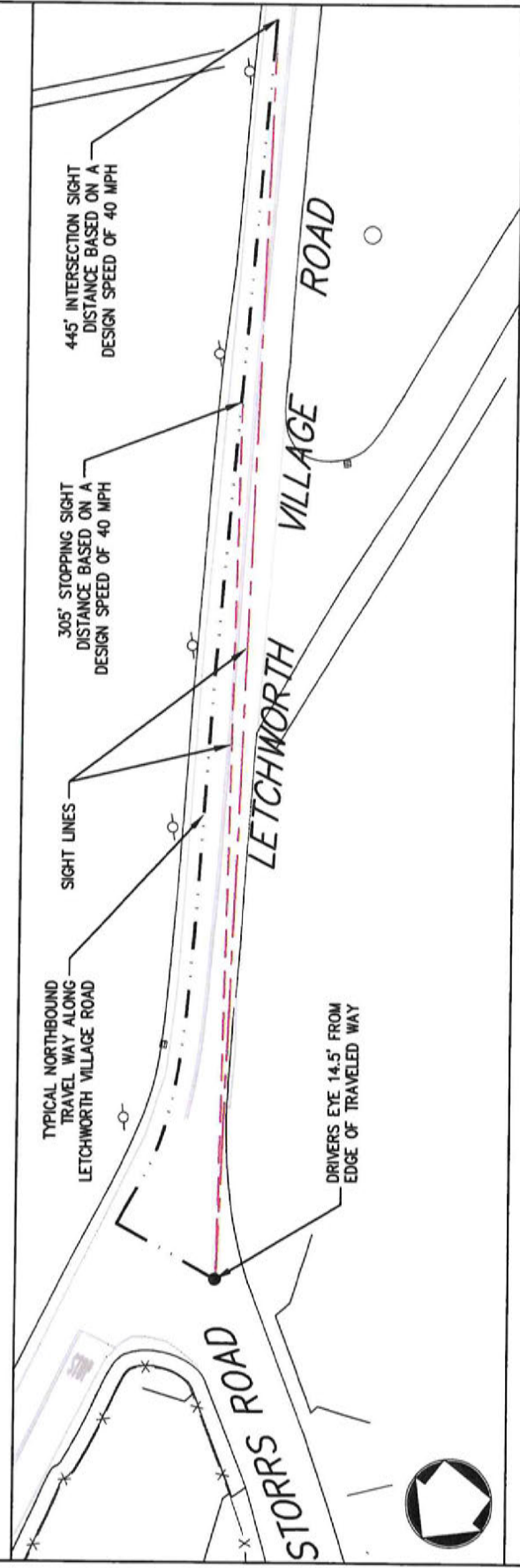
JMC PROJECT: 21090
SCALE: 1" = 40'
HAWORTH ROAD
HAWORTH, NY

SIGHT DISTANCE

DATE: 05/20/20
FIGURE: SD-1



RIGHT TURN FROM STOP (LOOKING LEFT)



LEFT TURN FROM STOP (LOOKING RIGHT)