

**TOWN OF HAVERSTRAW
STATE ENVIRONMENTAL QUALITY REVIEW ACT
FINDINGS STATEMENT
*Letchworth Road Residential Development***

Pursuant to the State Environmental Quality Review Act ("SEQRA"), Article 8 of the Environmental Conservation Law, and 6 NYCRR Part 617, the Town of Haverstraw Planning Board (the "Planning Board"), as the SEQRA Lead Agency, makes the following findings:

Name of Action: Letchworth Road Residential Development (the "Project")

Description of Action: The Applicant, Haverstraw Group, LLC, proposes re-development and repurposing of a portion of the Letchworth Village Property in the Town of Haverstraw. Tax Lot 19.16-1-14 is a 154.6 acre tract 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. The property to be developed (the "Project Site") consists of 23.86 acres of vacant and underutilized land on the eastern portion of the tax lot. The Project proposed consists of seven (7) multifamily apartment buildings, constructed in accordance with the Type V-A (protected Wood Frame) construction type standards over one (1) level of garage parking. The Proposed Action also includes the construction of a clubhouse and recreation areas which will be built to provide amenities for the residents. The main access point to the project will be provided off of Ridge Road to the north of its intersection with Letchworth Village Road, and intersection improvements are proposed that will realign the intersection and provide a new roundabout at the driveway entrance to allow for future construction on the adjacent underutilized parcels.

Project Location: Letchworth Village Road, Town of Haverstraw, Rockland County, New York 10984 (the "Site").

Tax Parcel IDs: 19.11 (Town of Haverstraw)

Acceptance Date of Final Environmental Impact Statement: June 10, 2026

Lead Agency: Town of Haverstraw Planning Board

Address: 1 Rosman Road
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SEQR Classification: Type I

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1. AGENCY JURISDICTION AND DESCRIPTION OF SEQRA PROCESS

The following agencies have jurisdiction over one or more aspects of the Project.

Agency	Approval/Review
Town of Haverstraw Planning Board	• SEQRA Determination • Site Plan Approval • Subdivision Approval
Town of Haverstraw Town Board	• Rezoning Approval (R-120 to LA-17) • Amendment of LA-17 Zoning Height
Town of Haverstraw Building Department	• Building Permit
Town of Haverstraw Department of Public Works	• Department of Public Works Water & Sewer Approval
Joint Regional Sewerage Board	Joint Regional Sewerage Board Approval
Veolia Water New York	• Veolia Water New York Approval
New York State Department of Environmental Conservation (NYSDEC)	• 2025 SPDES Permit • SPDES General Permit GP-0-20-001 for Stormwater Discharges from Construction Activities
Rockland County Planning Board	• §239-m General Municipal Law Referral
New York State Department of Transportation (NYSDOT)	• Highway Work Permit

The following provides a summary of the SEQRA process for the Project.

01/11/2024	Applicant submitted an application to the Planning Board seeking Subdivision and Site Plan Approval
02/14/2024	The Planning Board circulated its Notice of Intent to serve as SEQRA Lead Agency
07/10/2024	The Planning Board Board declared itself Lead Agency under SEQRA and issued a Positive Declaration declaring that a Draft Environmental Impact Statement (DEIS) be prepared.
08/14/2024	A Public Hearing on the Draft Scoping Document was held.
09/11/2024	The Planning Board adopted the Final Scope for the DEIS.
01/24/2025	The Applicant prepared a DEIS, which was submitted to the Planning Board and staff for the purposes of performing a completeness review.
02/28/2025	The Applicant submitted a full DEIS to the Planning Board
03/12/2025	The DEIS was accepted as complete by the Planning Board and a Public Hearing was scheduled for 04/09/2025.
04/09/2025	A Public Hearing on the DEIS was held.
08/29/2025	The Applicant submitted an FEIS substantially addressing all of the comments received during the DEIS process.
06/10/2025	The Planning Board adopted the FEIS.

2. STATEMENT OF FINDINGS AND DETERMINATIONS

The following findings and determinations are made by the Town of Haverstraw Planning Board, as SEQRA Lead Agency, upon review of the DEIS and FEIS (collectively, the “Environmental Impact Statement” or “EIS”), accompanying Project plans, and the entire record of this proceeding.

3. PROJECT BACKGROUND

The Applicant proposes the development of 300 multi-family residential units within seven (7) 3.5 story buildings situated on a vacant and underutilized 23.86-acre portion of Tax Lot 19.16-1-4 in the Town of Haverstraw, a portion of the former Letchworth Village Property. The proposed Action will also involve the construction of a community clubhouse and recreation areas which will be designated to provide amenities for the residents. The Applicant sought the rezoning of the site parcel to convert it from R-120 Rural Residence District zoning to LA-17 Luxury Apartments zoning. A new driveway to the development will intersect Ridge Road north of its intersection with Letchworth Village Road. The intersection between Ridge Road and Letchworth Village Road is also proposed to be realigned and a new traffic circle constructed at the driveway entrance to provide access to further potential development elsewhere on the site.

A Draft Environmental Impact Statement (DEIS) was prepared to analyze the Applicant’s 300 multi-family residential units and included an analysis of other site development Alternatives A - C, which were determined during the scoping process. Alternatives A - C are summarized below:

- Alternative A – No Action (No Build) Alternative
- Alternative B - Zoning Compliant (R-120) Conventional Subdivision for a Single-Family Residential Development
- Alternative C - Rezone to Facilitate a 300-unit Multifamily LA-17 Development

Under the proposed Alternative A, the Project Site would likely continue to deteriorate and decline in appearance while not providing any of the potential positive opportunities presented by a proposed redevelopment.

Under the proposed Alternative B, the parcel would be developed with seven (7) single-family homes on lots exceeding 120,000 s.f. in area. This Alternative does not align with the goals and objectives of either the Applicant from an economic and feasibility standpoint nor the goals of the Town of Haverstraw. This Alternative would not provide the same level of potential benefits for the Town.

4. DESCRIPTION OF PROPOSED PROJECT

The subject property is a portion of the Letchworth Village Property in the Town of Haverstraw. Tax Lot 19.16-1-14NY is a large tract (154.6 acres) bordered by Willow Grove Road and residential development to the north, Letchworth Village Road to the south and west, and New York State owned lands to the east. The overall tax lot contains many of the remaining buildings of the former Letchworth Village Development Center. The property to be developed (the "Project Site") consists of a 23.86-acre portion of vacant and underutilized land on the east side of the tax lot. The project will consist of the construction of 300 multi-family residential units within seven (7) 3.5 story buildings. Additionally, the Proposed Action also includes the construction of a clubhouse and recreation areas for the residents. The buildings are to be connected with a series of internal driveways and approximately 2,600 linear feet of proposed sidewalks and will connect with Ridge Road just north of its intersection with Letchworth Village Road. A total of 682 parking spaces for residents and visitors will be provided. Water and sewer main improvements will be constructed in order to serve the development, intersection improvements will be provided at the intersection of Letchworth Village Road and Ridge Road to improve safety, and a traffic circle will be constructed at the driveway entrance to the site to allow for future development of the remainder of the overall remaining parcel.

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5. EXISTING ENVIRONMENTAL CONDITIONS, ANTICIPATED IMPACTS, AND MITIGATION

A. LAND USE, ZONING, AND PUBLIC POLICY

The following is: (1) a summary of land use, zoning, and public policy issues at and near the Project Site; (2) the potential environmental impacts caused by Project Development; (3) impact avoidance strategies and/or mitigation measures identified as necessary and practical to minimize or eliminate adverse environmental impacts; (4) and the Planning Board's Findings with respect to the same.

1. The proposed action site is located within the Town of Haverstraw's R-120 "Rural Residence District" Zone. Under Town Code Chapter 167, multi-family residences are not a permitted use in this zoning district. To allow for the Proposed Action, a zoning change must be made by the Town Board for the Project to be a permitted use.
2. The project is part of an existing 154.6-acre parcel. The areas surrounding the parcel are zoned for single family residential with a mix of conforming uses that are either residential, community services, or recreational use. There are no commercial or industrial uses in the vicinity of the site.
3. The project site was the subject of a Blight Determination Study conducted in May 2001 and amended in October 2001 and October 2004. As a result of that Study, the Town adopted an Urban Renewal Plan for the site in July 2005 and designated the Study site as the "Letchworth Village Urban Renewal Area."
4. The R-120 zoning district permits single family residences and public parks on lots greater than 120,000 square feet. This zone has acted as a placeholder while the Town considers other developments that do not comply with this zoning standard. The Town has continually sought to redevelop the property to revitalize the area and remove blight while also placing priority on developing this land before other locations in the County are sought for development.
5. The Applicant proposes seeking a zoning change to the LA-17 "Luxury Apartment Multifamily Residential District" Zone, which allows for multifamily residential development at a rate up to 17 units per acre. The Applicant also proposed amending the bulk requirements of the LA-17 zone to change the building height to 50 feet to account for the sloped roof preferred by the Town Board. This would allow the Proposed Action to comply with Town Zoning requirements.
6. The Proposed Project will comply with all of the zoning regulations of the LA-17 "Luxury Apartment Multifamily Residential Zoning District" as so amended.
7. The Proposed Actions conform with the goals set out in the Town of Haverstraw Master Plan of 2000, the Town of Haverstraw Urban Renewal Plan of 2005, the 2011 Rockland County Comprehensive Plan, and the 2024 Rockland County Housing Needs Assessment by providing for different housing types and increasing economic activity in the Palisades Parkway corridor along with a needed rental apartment housing option within the Town of Haverstraw.

8. It is anticipated that the Proposed Project will complement the existing surrounding land uses. The density and housing types supplied by the Project would help satisfy goals set forth by the Town and County to provide additional housing options for residents and increase economic activity in the areas of focus that had been previously designated.

Based on the aforementioned information, the DEIS, the FEIS, and other related documents, the Planning Board finds that the Proposed Action will not create any significant adverse environmental impacts to land use, zoning, and public policy, and will avoid or minimize adverse environmental impacts to the maximum extent practicable. No mitigation is required.

B. VISUAL IMPACTS

The following is: (1) a summary of the community character and visual resource conditions that currently exist on the Project Site; (2) the potential environmental impacts caused by Project Development; (3) impact avoidance strategies and/or mitigation measures identified as necessary and practical to minimize or eliminate adverse environmental impacts; (4) and the Planning Board's Finding with respect to the same.

1. The existing site contains large vegetated buffers at its borders. The majority of the property consists of trees, grassland, and field areas, and the site contains the remains of a single-family residence that had been destroyed by arson. The adjacent structures on the remainder of the town-owned parcel are in various states of decay after years of neglect, and the site is generally unmaintained.
2. The Plan proposes the construction of seven (7) 3.5 story residential apartment buildings with space and garage parking spaces. A 10,625 s.f. clubhouse, pool area, and multiple sport courts will be included on the property as well. The architectural character of the development is designed to have a modern residential aesthetic.
3. Only the portion of the property along Letchworth Village Road to the south is anticipated to be visible from public roadways. A visual impact analysis was performed to ensure that the site would not be visible from broader regional viewpoints considering the distance, topography, and vegetation that would remain between the project site and the surrounding areas.

Given the existing vegetation on the site and that new planting is proposed to be performed as part of the Proposed Project, it is not expected that there would be any significant impacts caused by the project. Based on the aforementioned information, the DEIS, the FEIS, and other related documents, the Planning Board finds that the Proposed Action will not create any significant adverse environmental impacts to visual impacts and will avoid or minimize adverse environmental impacts to the maximum extent practicable. No mitigation is required.

C. SOILS, TOPOGRAPHY, AND STEEP SLOPES

The following is: (1) a summary of the soils, topography, and slope conditions that currently exist on the Project Site; (2) the potential environmental impacts caused by Project Development; (3) impact avoidance strategies and/or mitigation measures identified as necessary and practical to minimize or eliminate adverse environmental impacts; (4) and the Planning Board's Findings with respect to the same.

1. SESI Consulting Engineers was retained as the geotechnical consultant for the Project. The Applicant has prepared a thorough subsurface study and investigation.
2. Additional testing was performed in areas where stormwater system elements are proposed, in accordance with New York State Standards. In the original subsurface investigation from March 2024, 41 test pits and 6 soil borings were performed. In June and July of 2025, additional subsurface data was collected with 10 additional test pits and 9 additional soil borings. The additional testing was performed to confirm subsurface conditions on the site for the design of the proposed stormwater management systems that had been proposed in the site plan.
3. Natural soils were found across the site, consisting of silt-clay and silt with varying amounts of sand and cobbles. Groundwater onsite was found at depths of 1-13 feet deep. The overall Project Site generally slopes east and west, with a central high point and an average grade of 440 feet above sea level.
4. To prevent erosion from occurring, the applicant will provide temporary and permanent control measures and facilities.
5. Overall, it is expected that there will be a net import of approximately 11,500 cubic yards of fill, which when considering the earthwork required to bring the site to the subgrade of the roads and buildings, is substantially balanced.
6. As part of the Proposed Action, several retaining walls will be constructed. The walls are expected to be located in the areas where the existing slopes are steepest, providing the greatest mitigation any steep slopes disturbance required for the Proposed Action.
7. All areas disturbed are to be stabilized with native ground covers during post construction operations.

Based on the aforementioned information, the DEIS, the FEIS, and other related documents, the Planning Board finds that the Proposed Action will not create any significant adverse environmental impacts to soils, topography, and steep slopes, and will avoid or minimize adverse environmental impacts to the maximum extent practicable. No mitigation is required.

D. FLORA, FAUNA, AND HABITAT

The following is: (1) a summary of the flora, fauna, and habitat conditions that currently exist on the Project Site; (2) the potential environmental impacts caused by Project Development; (3) impact avoidance strategies and/or mitigation measures identified as necessary and practical to minimize or eliminate adverse environmental impacts; (4) and the Planning Board's Findings with respect to the same.

1. The project site generally is indicative of the type of fauna typical in vacated lands that have experienced various levels of neglect over the past several decades. Formerly landscaped institutional use, the project site has gradually returned to a mix of forested land and lawn/meadow areas. Approximately 1/3 of the project site has been used in recent years as natural turf for recreational sports fields. The remaining 2/3 of the site has been a mix of recent forest and meadow areas. Due to the surrounding institutional and residential uses, there are not likely any natural wooded wildlife corridors.
2. As per the FEIS and the NYSDEC Environmental Resources Mapper, the Project Site is not known to contain any species of plants or animals that are listed by New York State as threatened or endangered, nor areas identified as habitats for plants or animals that are endangered, or any species of plant or animal that is listed by New York State as rare or as a species of special concern.
3. The entire tax parcel containing the Project lies within the Significant Biodiversity Area (SBA) known as "Hudson Highlands West." The SBA consists of an 801,972 acre area stretching from Orange and Rockland Counties into New Jersey. Additionally, a portion of the site lies within the area for migratory fish along the Minisceongo Creek. The creek runs to the west and south of the project site, and within the Town of Haverstraw there are many other uses within the migratory fish area, including single family homes, schools, commercial buildings, and industrial buildings. The portion of the site situated within the migratory fish area includes the Stormwater Basin 2B, and overall, the Proposed Action will have relatively insignificant impact on the Minisceongo Creek Migratory Fish Area.
4. The Proposed Action would reduce the habitat available for wildlife, however, wildlife population movement around the periphery of the Project Site would be relatively unrestricted. Areas that do not contain structures will be maintained as lawn or as landscaped areas, and some areas will be seeded and left to revegetate naturally.
5. Additionally, the proposed landscaping plan will provide 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.
6. As the parcel is primarily of recent second growth characteristics, there are many existing areas of invasives and younger woodlands that do not contribute greatly ecologically. Additionally, the residential nature of the proposed use is consistent with existing uses in the area and would not be likely to have adverse impacts on flora and fauna and on the existing waterways within the vicinity.

Based on the aforementioned information, the DEIS, the FEIS, and other related documents, the Planning Board finds that the Proposed Action will not create any significant adverse environmental impacts to flora, fauna, and habitats, and will avoid or minimize adverse environmental impacts to the maximum extent practicable. No mitigation is required.

E. STORMWATER MANAGEMENT

The following is: (1) a summary of the stormwater management that currently exists on the Project Site; (2) the potential environmental impacts caused by Project Development; (3) impact avoidance strategies and/or mitigation measures identified as necessary and practical to minimize or eliminate adverse environmental impacts; (4) and the Planning Board's Findings with respect to the same.

A Stormwater Pollution Prevention Plan (SWPPP) was prepared regarding the Proposed Action. As part of this, the development was designed in accordance with the 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, and the Requirements of the SPDES General Permit 2024 stormwater design manual.

1. There is no known existing stormwater infrastructure on the site. The topography rises to a high point at the center of the site and drops off in every direction around it. The overall parcel contains a watercourse and associated wetlands, though the wetlands are several hundred feet from the location of the Project Site.
2. A comprehensive Stormwater Pollution Prevention Plan has been prepared including the detailed design of the stormwater management facilities that are proposed. A hydrologic model was prepared using a rainfall distribution curve based on rainfall data from the Northeast Regional Climate Center. 3 Design Points were studied based on feedback from the Town of Haverstraw Town Consulting Engineer, and the analyses demonstrate a net zero increase from preexisting flow conditions. Emergency discharge from the stormwater management systems will be directed away from New York State owned property to the east.

Based on the aforementioned information, the DEIS, the FEIS, and other related documents, the Planning Board finds that the Proposed Action will not create any significant adverse environmental impacts to stormwater management and will avoid or minimize adverse environmental impacts to the maximum extent practicable. No mitigation is required.

F. WATER SUPPLY AND SANITARY SEWERAGE

The following is: (1) a summary of the water supply and sanitary sewerage conditions that currently exist on the Project Site; (2) the potential environmental impacts caused by Project Development; (3) impact avoidance strategies and/or mitigation measures identified as necessary and practical to minimize or eliminate adverse environmental impacts; (4) and the Planning Board's Findings with respect to the same.

1. The area around the Project Site had been previously developed, and contains existing water and sewer mains abandoned in place in the vicinity. An existing water main and an existing sanitary main are located in Letchworth Village Road.
2. Water supply at the site is provided by Veolia Water New York Inc. Sanitary sewerage services are provided by the North Rockland Joint Regional Sewerage Board as part of its Haverstraw Joint Regional District.
3. Public and private water main and sanitary sewer main extensions are to be constructed as part of the Proposed Project. Public mains will be constructed within the Letchworth Village Road and Ridge Road right of ways and private mains will be constructed internally within the Project Site. The proposed public main extensions will allow for the existing adjacent church property to connect into the public water system if it chooses to do so and allow for future redevelopment of other portions of the town owned properties. New fire hydrants are being provided on and adjacent to the property as well for the protection of the remaining structures on the town owned parcel, and hydrant locations have been coordinated with the local Fire District.
4. Water and sewer main extensions are being coordinated with Veolia Water New York Inc. and the North Rockland Joint Regional Sewerage Board. A willingness to serve letter has been obtained from the Joint Regional Sewerage Board. Veolia Water has not issued a willingness to serve letter yet; however, representatives of Veolia have indicated that they are able to serve the project pending receipt of a contribution to infrastructure improvements that may be required. The Applicant has stated that it will work with Veolia to address the required improvements.

Based on the aforementioned information, the DEIS, the FEIS, and other related documents, the Planning Board finds that the Proposed Action will not create any significant adverse environmental impacts to the water supply and sanitary sewerage networks and will avoid or minimize adverse environmental impacts to the maximum extent practicable. No mitigation is required.

G. OTHER UTILITIES AND SERVICES (GAS, ELECTRIC, TELECOM)

The following is: (1) a summary of the existing utilities that currently exist on the Project Site; (2) the potential environmental impacts caused by Project Development; (3) impact avoidance strategies and/or mitigation measures identified as necessary and practical to minimize or eliminate adverse environmental impacts; (4) and the Planning Board's Findings with respect to the same.

1. Electricity, natural gas, telephone, and other telecommunications services are already provided in the vicinity of the site. Orange and Rockland (O&R) Utilities provides electricity and gas services in the area. Optimum and Verizon both provide high speed internet access for data, television, and telecommunications in the vicinity as well, and the service provider for the site will be chosen at a later date. A willingness to serve letter has been obtained from O&R.
2. As requested by the Town, the proposed roundabout at the entrance of the site and the utility extensions have all been designed to provide connections for future

development of the remainder of the town owned parcel.

3. Given that the maximum extent of impact on the existing utilities is that service connections will be created, only minor impacts are expected to occur and therefore there will not need to be any mitigation.

Based on the aforementioned information, the DEIS, the FEIS, and other related documents, the Planning Board finds that the Proposed Action will not create any significant adverse environmental impacts to other utilities and services and will avoid or minimize adverse environmental impacts to the maximum extent practicable. No mitigation is required.

H. TRAFFIC, TRANSPORTATION, AND PARKING

The following is: (1) a summary of the traffic, transportation, and parking conditions that currently exist on the Project Site; (2) the potential environmental impacts caused by Project Development; (3) impact avoidance strategies and/or mitigation measures identified as necessary and practical to minimize or eliminate adverse environmental impacts; (4) and the Planning Board's Findings with respect to the same.

1. An analysis of the surrounding roadway network under the existing and future conditions with and without the Proposed Action was performed for peak weekday morning, weekday school afternoon, weekday roadway evening, and Saturday midday hours.
2. The Proposed Action is projected to generate 116, 161, 150, and 123 primary volume movements during the peak weekday AM, weekday school hour, weekday PM hour, and Saturday midday hour respectively.
3. The Proposed Action is approximately 1 mile southeast of the Palisades Interstate Parkway Interchange 4, and 2.25 miles from the Palisades Interstate Parkway Interchange 3, providing regional access to the Bear Mountain Bridge and to the Gov. Mario M. Cuomo and George Washington Bridges. Roadways adjacent to the site have 30 mph posted speed limits and the pavement is in good condition. On-street parking is typically prohibited along these roadways.
4. Multiple schools are located within 1 mile of the Proposed Action.
5. Public bus services are provided within the project area that operate on a "flag down" service policy where riders anywhere along the routes can flag down busses to stop without having to travel to set bus stops.
6. Improvements proposed to adjacent intersections include:
 - a. Letchworth Village Road and Storrs Road is proposed to be modified so that the Storrs Road approach is converted to a stop approach and Letchworth Village Road is free flowing.
 - b. Letchworth Village Road and Ridge Road is proposed to be realigned to remove the intersection skew and add additional "All Way" signage below the stop signs.

- c. US-202, Theills-Mt. Ivy Road, NYS Route 45, and Old Country Road are proposed to have traffic signal timing modifications between 2:00 PM and 7:00 PM on weekdays.
 - d. US-202, NYS Route 45, and Old Country Road are proposed to prohibit right turns on red for the northbound NYS Route 45 approach with the installation of associated signage.
 - e. Deer warning signage is proposed to be added along Theills-Mt. Ivy Road between Anderson Road and Rosman Road.
7. A total of 667 on-site parking spaces are proposed, with 399 general surface parking spaces, 134 reserved garage parking spaces, and 134 reserved tandem parking spaces in front of the garages.
 8. There are a lack of existing pedestrian facilities connecting the nearby schools on to the Project Site; therefore, the applicant is proposing a bus stop and associated shelter near the entrance to the site.
 9. Pedestrian connectivity has been provided between the adjacent church property and the Proposed Action.
 10. A new roundabout is proposed at the driveway entrance on the town-owned land to provide access to the site, the existing church and to adjacent town-owned land to allow for future development proposals.

Based on the aforementioned information, the DEIS, the FEIS, and other related documents, the Planning Board finds that the Proposed Action will not create any significant adverse environmental impacts to traffic, transportation, and parking, and will avoid or minimize adverse environmental impacts to the maximum extent practicable. No mitigation is required.

I. COMMUNITY DEMOGRAPHICS, FACILITIES, AND SERVICES

The following is: (1) a summary of the community demographics, facilities, and services that currently exist on the Project Site; (2) the potential environmental impacts caused by Project Development; (3) impact avoidance strategies and/or mitigation measures identified as necessary and practical to minimize or eliminate adverse environmental impacts; (4) and the Planning Board's Findings with respect to the same.

1. The Town professional staff and various boards have communicated a need for multi-family housing opportunities. This need is supported by the 2024 Rockland County Housing Needs Assessment. The Town's population is estimated to be around 38,871, according to the US Census American Community Survey (ACS 2020-2023 Four-Year Population Estimate). Additionally, the Town has placed an emphasis on redeveloping previously developed parcels before new developments are considered in order to conserve natural resources.
2. Approximately 65.6% of households in the Town own their home, with an average of 2.99 persons per household. The median age in the Town is 38.9 years, exceeding the County median of 34.7 years and demonstrating a need for additional housing for

young families with school aged children. The population aged 65 and older accounts for approximately 15.8% of the total population.

3. The median household income in the Town is \$87,716, which is lower than that of Rockland County as a whole (\$106,589).
4. Correspondence with the various service departments has occurred with department chiefs, including Ambulance Corps, Police, and Fire, and additionally with the Town Director of Finance who has indicated that there will be no additional demand on the services from the Proposed Action. The overall increase in residents from the Proposed Action would increase the Town's population by approximately 1.9%, and it is expected that some residents would already be current residents of the Town relocating for new housing opportunities.
5. The North Rockland Central School District has seen enrollment decline in recent years, and in discussions with the District, it has been made known that none of the schools are at or near their capacity limitation.
6. The Proposed Action will create 300 units of new, high quality multi-family dwellings in the Town that will provide a needed diversification of housing opportunities in the community. Additionally, the results of studies from the Town regarding reuse of the property will be met.
7. The Proposed Action will return the property to the Town tax rolls, generating much needed income and offsetting potential impacts to public services.

Based on the aforementioned information, the DEIS, the FEIS, and other related documents, the Planning Board finds that the Proposed Action will not create any significant adverse environmental impacts to community demographics, facilities, and services, and will avoid or minimize adverse environmental impacts to the maximum extent practicable. No mitigation is required.

J. FISCAL AND ECONOMIC CONDITIONS

The following is: (1) a summary of the fiscal and economic conditions that currently exist on the Project Site; (2) the potential environmental impacts caused by Project Development; (3) impact avoidance strategies and/or mitigation measures identified as necessary and practical to minimize or eliminate adverse environmental impacts; (4) and the Planning Board's Findings with respect to the same.

1. The site as existing does not contribute to the Town tax rolls, as it is exempt Town-owned property.
2. The Applicant will be purchasing the site from the Town of Haverstraw, providing the Town with immediate revenue of \$14,400,000.00 in FY2026. The Proposed Action is also 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. After year 15 of the PILOT program and the Proposed Action is fully integrated into the community, the property will be assessed and taxed based on

the future assessment practices utilized by the Town of Haverstraw.

3. The Proposed Action is estimated to generate approximately 739 residents, which would create new municipal service costs totaling $\pm \$616,215.00$. This service cost estimate is based on average costs, not marginal increases, and it should be noted that the average per capita cost overstates the actual per capita cost as it does not account for the fact that new construction, equipment, personnel, and other fixed expenses do not increase with each additional resident. 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 that are expected as part of the development. The actual marginal costs of educating these additional students will be much lower.
4. On July 1st, 2025, the project team had discussions with the Town Director of Finance, and it was determined that the Proposed Action would not require additional financial resources to any of the Town's service departments and districts.

Based on the aforementioned information, the DEIS, the FEIS, and other related documents, the Planning Board finds that the Proposed Action will not create any significant adverse environmental impacts to social and economic conditions and will avoid or minimize adverse environmental impact to the maximum extent practicable. No mitigation is required.

K. NOISE AND AIR QUALITY

The following is: (1) a summary of the noise and air quality conditions that currently exist on the Project Site; (2) the potential environmental impacts caused by Project Development; (3) impact avoidance strategies and/or mitigation measures identified as necessary and practical to minimize or eliminate adverse environmental impacts; (4) and the Planning Board Finding with respect to the same.

1. The Project Site has no sensitive receptors in the vicinity. While there are school facilities to the east and west, they are approximately 1,200 feet from the project site.
2. The Proposed Action may result in mobile sources of pollution in the form of vehicular trips. Possible relevant pollutants for mobile sources include particulate matter (PM), ozone (O₃), and carbon monoxide (CO).
3. The noise analysis performed for the Proposed Action revealed no significant noise impact. Despite this, the applicant proposed incorporating several mitigating measures.
4. 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 the site boundaries and the Applicant shall schedule noise producing operations concurrently to reduce long exposure to noticeable sound levels.
5. The Proposed Action will conform to the construction time restrictions set forth in Town Code Section 167-40A(1), 7:00 AM to 7:00 PM on the weekdays and 8:00 AM to 5:00

PM on Saturdays. No construction operations are to take place on Sundays and Holidays.

6. 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.
7. All construction related air quality impacts will be of relatively short duration. The expected construction timeframe is 24 months.
8. Construction noise impacts are expected to be of relatively short duration. Long term noise impacts from this type of construction would include vehicular noise, which is a function of traffic speed, vehicle mix, and volume. Projected speeds and vehicle mixes are not anticipated to change as part of the project, so any noise difference will be a result of the change in volume. For every doubling of traffic volume, there will be an increase in 3 dBA of noise, which is considered “unnoticed” to “tolerable” according to NYSDEC noise evaluation guidelines, and the proposed Action is not anticipated to substantially increase traffic volumes.

Based on the aforementioned information, the DEIS, the FEIS, and other related documents, the Planning Board finds that the proposed Action will not create any significant adverse environmental impact to noise and air quality conditions and will avoid or minimize adverse environmental impacts to the maximum extent practicable. No mitigation is required.

L. HISTORIC AND CULTURAL RESOURCES

The following : (1) a summary of the historical and cultural resources that currently exist on the Project Site; (2) the potential environmental impacts caused by Project Development; (3) impact avoidance strategies and/or mitigation measures identified as necessary and practical to minimize or eliminate adverse environmental impacts; (4) and the Planning Board’s Findings with respect to the same.

1. A consultation with the New York State Office of Parks, Recreation, and Historic Space (NYSOPRHP, also known as SHPO), via its Cultural Resources Information System (CRIS) was formally made on December 4th, 2024.
2. Additional correspondence from SHPO was received, 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.
3. The Project Site contains the foundation remains of the Jacobson Building, which was the “old director’s residence.” The structure was destroyed by arson in 2010.
- 1) Although not on the Subject Property, there is an abandoned dormitory structure known as the “Whitman Building,” located near the main access driveway to the

Proposed Action. The structure is a standalone abandoned building in poor condition surrounded by walking paths. This structure is proposed to be demolished.

4. Although the SHPO has deemed the Letchworth Village Property as State Register Eligible, at this time no action has been taken by the agency. Due to the prolonged abandonment of the facilities, the passage of time, vandalism, and general deterioration, the removal of the Whitman Building and the Jacobson Building foundation will not represent an adverse environmental impact regarding the preservation of historical or cultural resources requiring further mitigation.

Based on the aforementioned information, the DEIS, the FEIS, and other related documents, the Planning Board finds that the Proposed Action will not create any significant adverse environmental impacts to historical and cultural resources and will avoid or minimize adverse environmental impacts to the maximum extent practicable. No mitigation is required.

M. CONSTRUCTION INFORMATION

The following is: (1) a summary of the construction on the Project Site; (2) the potential environmental impacts caused by Project Development; (3) impact avoidance strategies and/or mitigation measures identified as necessary and practical to minimize or eliminate adverse environmental impacts; (4) and the Planning Board's Findings with respect to the same.

1. Prior to the start of construction or any disturbance to the Project Site, a pre-construction meeting will be held with the owner and contractor, the Town of Haverstraw, and project engineer to discuss construction details and erosion and sediment control plans.
2. Site preparation, in accordance with the Erosion and Sediment Control Plan, will include installing security fencing at the driveway of the Project Site and construction fencing at the limits of disturbance to prevent unauthorized entry to construction areas, to restrict access to areas that could be hazardous to the public, and to protect areas not proposed to be disturbed from construction operations. A stabilized construction entrance/exit will be established to prevent vehicle tracking of sediment outside of the Project Site. The construction entrance/exit will be constructed with two to four-inch stone aggregate. The stabilized construction entrance will be a minimum of 50 feet in length by 24 feet in width by 8 inches in depth. Construction vehicles will access the Site through the construction gates.
3. Equipment that will be utilized during the construction of the Proposed Action will include the typical heavy earthwork equipment such as excavators, bulldozers, front-end loaders, dump trucks, drill rigs, graders, pavers, and compactors, as well as a track crane with boom, aerial lifts, pickup trucks, tri-axle dump trucks, low-boy tractor trailers, and box trucks.
4. Truck traffic will be moderate during the progression of construction. Initially, the earthwork equipment will be mobilized and delivered to the Project Site at the outset of work and remain for approximately six months. After the earthwork activities are

completed there will be various trucks with deliveries and equipment throughout the duration of construction, generating approximately several trucks per day. Construction workers will generate traffic each day in the morning and at the end of the day, as well, which will result in approximately ten to fifteen vehicles per day for the duration of construction. The number of worker vehicles will vary throughout the different stages of construction completion as the various trades complete their work, i.e., plumbers, electricians, painters, etc.

5. Employees will generally arrive at the Site prior to peak AM commuter traffic and leave prior to peak PM commuter traffic. Deliveries will be scheduled throughout the day and therefore are not anticipated to have a significant impact on traffic conditions.

Based on the aforementioned information, the DEIS, the FEIS, and other related documents, the Planning Board finds that the Proposed Action will not create any significant adverse environmental impacts to historical and cultural resources and will avoid or minimize adverse environmental impacts to the maximum extent practicable. No mitigation is required.

6. SUMMARY OF PROJECT ALTERNATIVES

1. The DEIS and FEIS evaluated the following alternatives to the Proposed Action:
 - a. No Action (No-Build) Alternative
 - b. Conventional Subdivision for a Single-Family Residential Subdivision
2. The Town Board required that a quantitative and qualitative analysis of each alternative be conducted and that the results be compared to the Applicant's proposed alternative. The analysis compared the following areas of impact:
 - a. Land use, zoning, and public policy.
 - b. Community character and visual impacts.
 - c. Stormwater management.
 - d. Water supply & sanitary sewerage.
 - e. Other utilities and services.
 - f. Traffic, transportation, pedestrians, and transit.
 - g. Community demographics, facilities, and services.
 - h. Fiscal and economic conditions.
 - i. Noise and air quality conditions.

- j. Historic and cultural resources.
 - k. Construction.
3. Both alternatives studied conform to the existing R-120 residential zoning, however, in the no build alternative, Alternative A, the site remains underutilized in a neglected condition with no improvements. Additionally, in the conventional subdivision alternative, Alternative B, the goals and objectives of the Applicant from an economic and feasibility standpoint would remain unmet and the project would not align with the goals of the Town of Haverstraw.
 4. Alternative A would not conform with the community character, as the project site would continue to degrade and retain its existing character with vandalism, overgrown areas of invasive species, and underutilized areas counter to the Town's objectives. Alternative B would match the existing community character, though it would be less appealing than a landscaped boulevard entrance to the site and would retain less of a landscaped buffer to adjacent properties.
 5. Alternative A would not require a Stormwater Pollution Prevention Plan, and there would be no water quality treatment, detention, or best management practices. The quantity and quality of stormwater would not be adversely altered or enhanced when compared to pre-development condition. Alternative B would require a SWPPP and similar practices to the proposed action, however, this does not meet the goals and objectives of the Applicant or the Town.
 6. Alternative A would not create any increase or decrease in demand for water or sanitary sewer service. Alternative B would generate a substantially smaller water and sanitary sewer demand than the Proposed Action, but it would still require significant infrastructure improvements to construct water and sewer main extensions.
 7. Alternative A would create no impact on the existing utility infrastructure or services, and the property would remain unaltered. Alternative B would require the utilization of public utilities similar to the Proposed Action, but at a lesser scale.
 8. The no-build alternative would not generate any additional school children, police, fire, and EMS calls, or increase the amount of refuse and recycling generated in the Town, however, there would be no creation of additional recreational or open space opportunities for the community and the site would continue to foster invasive species and the Town would not gain additional revenue from the Proposed Action's school taxes. The conventional subdivision alternative would generate significantly fewer police, fire, and EMS calls, and fewer schoolchildren. This alternative would have a significantly smaller population than the Proposed Action and would require less resources.
 9. Alternative A would have the parcel remain owned by the Town, which would generate no additional revenue from its sale or from real property taxes. There would be no aggregate, direct, indirect, and induced outputs from the construction phase, no jobs would be created, and there would be no economic output during the Proposed

Action's operational phase. Alternative B would provide significantly less tax revenue for the Town than the Proposed Action, with a total annual tax revenue estimated around ±\$124,005.00 (assuming a market value of a four-bedroom single-family home worth \$700,000). The single-family subdivision would be assessed at a significantly lower value and would not generate the additional Town revenue that the PILOT Program would.

10. The no-build alternative would not result in any changes to the existing noise or air quality generated from the site. The single family subdivision would result in a decrease in noise conditions compared to the Proposed Action. However, while the noise generated would be marginally less, the alternative places two of the single-family homes closer to the existing residences and thus the impacts would be closer to the neighbors. Screening and noise mitigation practices would be implemented similarly to the Proposed Action.
11. Under Alternative A, there would be no change to the historic resources deemed eligible by SHPO, however, it is the Town's intent to develop the property and the site is not considered an area of archeological or cultural sensitivity. The existing site would continue to deteriorate and get vandalized. Under Alternative B, the historic resources registered by SHPO would still be cited. Both the Proposed Action and the conventional subdivision alternatives would go through the same approval process.
12. Under Alternative A there would be not any infrastructure or development activity and thus there would be no impacts associated with construction activity. Alternative B would have marginally fewer construction impacts than the Proposed Action, but disturbance of the site would still be required and there would still be temporary increases in noise and traffic.

7. SIGNIFICANT ADVERSE IMPACTS THAT CANNOT BE AVOIDED

A. SHORT TERM CONSTRUCTION IMPACTS

Short term impacts are generally related to construction activities occurring on-site that cannot be avoided. Unavoidable adverse impacts occurring in the short term include traffic generation from construction workers and deliveries, noise from construction equipment and traffic, air quality impacts from construction activities and equipment and potential erosion. The Applicant will employ best management practices during construction, which will mitigate all of these adverse impacts to the maximum extent practicable, as described elsewhere in this document.

Construction activities on-site would occur in accordance with Section 167-40A(1) of the Town Code, only taking place between the hours of 7:00AM to 7:00PM on weekdays and 8:00AM to 5:00PM on Saturdays. No construction operations are to take place on Sundays and Holidays.

Traffic volumes on local roadways would increase as a result of construction, but construction workers generally arrive and depart before weekday peak hours via

Letchworth Village Road and points beyond. Although air quality would be temporarily affected by exhaust and emissions from construction equipment and fugitive dust, mitigation measures would be utilized to reduce impacts. Erosion and sediment control measures would be employed on-site, in accordance with the SWPPP, to mitigate potential impacts from erosion as a result of construction activities.

B. LONG TERM IMPACTS

Potential long-term impacts that would result from the Proposed Action would be mitigated to the maximum extent practicable. Therefore, although the long-term impacts listed below are unavoidable, they are not significant. Long-term impacts resulting from the operation of the Proposed Action would include:

- **Habitat and Soil Disturbance:** The proposed action will result in physical disturbance to the majority of the 22.93-acre Project Site which contains natural habitats. While this disturbance is unavoidable, the Applicant proposes to mitigate the potential adverse impacts associated with the loss of natural habitat by implementing a landscaping plan which will remove invasive species, plant new native trees, understory shrubs and herbaceous plants.
- **Traffic:** The Proposed Action is projected to generate 116, 161, 150, and 123 primary volumes during the peak weekday AM, weekday school hour, weekday PM hour, and Saturday midday hour respectively. The majority of the studied intersections will operate at the same level of service as projected for the 2026 no-build conditions, except for some level of service degradations which result from minimal delays which would not be perceptible to drivers on the roadway.

Even though there are minor delay increases that resulted in degradations in level of service during the peak hours studied, which would not be perceptible to the driver, the Applicant recommends mitigations in response to the capacity analysis performed. The improvements proposed include modifying the intersection of Letchworth Village Road and Storrs Road to an all-way stop-controlled intersection as well as traffic signal timing modifications during the hours of 2:00 PM to 7:00 PM on weekdays at the intersection of US Route 202, Thiells-Mount Ivy Road, NYS Route 45, and Old County Road.

- **Community Services:** The Proposed Action will generate approximately 739 new residents or 1.9% of the total Town of Haverstraw population, some of whom may be relocating from within the Town. This population would have some impacts on community services but would have a minimal impact on per capita staffing levels for public safety and emergency services. The increase of 739 residents in the Proposed Action is estimated to create new annual service costs totaling \$±616,215.00 to the Town. The Proposed Action is also estimated to create an average increase of ±\$886,677.00 in educational costs for the ±33 school age children. The actual marginal costs will be much lower. Based on average costs, the total service and educational cost impacts created by the Proposed Action is approximately ±\$1,502,892 per year or \$22,543,380 over the fifteen-year span of the proposed PILOT Agreement. However, the Proposed Action is expected to generate \$11,745,000.00 in revenue for the Town during the fifteen-year PILOT

program. This is in addition to the \$14,400,000.00 purchase price that will be provided directly to the Town of Haverstraw. Thus, the total revenue to the Town and other taxing jurisdictions will be \$26,145,000, a net benefit of more than \$3,601,620.

Additionally, since the Project Site is adjacent to an existing roadway infrastructure and utility services, no major capital improvements are required or proposed.

- **Community Recreation Resources:** The Applicant will provide the project residents with a clubhouse and recreation areas. 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 swimming pool for residents. The recreation areas on-site will consist of a tennis court and pickleball courts for the residents. These should reduce impacts to public community recreational facilities. In addition, the Proposed Action will provide sidewalk walking paths interior to the community that will provide opportunities for residents to spend time outdoors.
- **School Impacts:** The Proposed Action is anticipated to generate 33 new public school children over 13 grades for the North Rockland School District. There is currently a surplus capacity within the School District. The addition of 33 public school children will not deplete the existing surplus capacity and is not likely to create demand for additional capital improvements beyond what is being currently administered by the district.
- **Utilities:** The Proposed Action would result in increased demand for utility services, including potable water, sanitary sewers, electricity and fossil fuels. While demand would be increased for such services, it is not anticipated that the Proposed Action would result in significant adverse impacts to utilities since capacity and infrastructure exist to accommodate the Proposed Action.
- **Visual Change as Viewed from Surrounding Roads:** The Proposed Action consists of seven 3.5 story residential apartment buildings. The architectural character of the building is a residential aesthetic with cues from the adjacent Letchworth Village structures that still exist. The project site will be landscaped with a mix of deciduous and evergreen trees, shrubbery and perennials to provide visual mitigation. The proposed buildings are located throughout the 23.86-acre parcel but are situated to enable a buffer area consisting of existing vegetation to remain and proposed landscaping. While there are some locations that will be clearly visible from Letchworth Village Road, for the most part views will not be significantly affected in the immediate vicinity of the Proposed Action. All lighting associated with the Proposed Action will be high efficiency and shielded to mitigate any trespass onto adjacent properties. The Proposed Action will also employ signage that will be unobtrusive and conforming to the Town Code for residential uses.

In summary, in the Applicants opinion, the Proposed Action will result in minimal off-site visual impacts to the surrounding area. The Applicant believes that the buildings will be aesthetically pleasing, and the Project Site will be landscaped and

well-maintained. In addition, the Applicant believes that the views to the Proposed Action are not considered a negative impact, but will be different than the existing condition, and are unavoidable with the construction and beneficial development of the area.

8. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

With the implementation of the Proposed Action, certain natural resources will be committed, and therefore consumed, converted, or made unavailable for future use. These resources include:

- During the construction period of the Proposed Action, consumption of gasoline, oil, natural gas and electricity will be utilized in the operations of the development. Also, the additional site generated automobile traffic will result in the consumption of fossil fuels.
- During the operational period of the Proposed Action, the residents and the employees will require the use of water, electricity, and natural gas. These natural resources will provide heating and cooling on a seasonal basis as well as running water and sewage.
- Commitment of resources such as building materials (brick and stone) is also a necessary component of the Proposed Action. The construction period is proposed to be phased over a 24- to 30-month period, so resources will be used gradually over that time.
- Construction and operational activities will also require a commitment of labor. The commitment of construction laborers will be temporary, while a permanent commitment of labor will be required for property maintenance and operations of the facility. The commitment of labor, both temporary and permanent, is considered to be a beneficial impact resulting from the proposed action.

9. GROWTH INDUCING ASPECTS

The preceding chapters of the Findings Statement describe the direct impacts anticipated to be generated by the Proposed Action. This section addresses the potential for the Action to directly or indirectly induce growth within the Town of Haverstraw.

The Proposed Action is expected to generate 739 residents upon completion, increasing the Town population by 1.9%. These new residents from the Proposed Action would bolster the sales of local commercial businesses, as they serve to meet the needs of the new residents or current residents who might wish to downsize from their existing single-family home and may now reside within the Proposed Action. This spending potential would provide an additional source of support for local retailers and restaurants and help strengthen the Town's economic vitality. However, the demand of the residents for goods

and services is not expected to stimulate additional development within the Town.

While demand for certain services – such as natural gas, electricity, water and wastewater surfaces – will increase as a result of the Proposed Action, there is adequate capacity to serve the public utility needs for the Project Site.

10. EFFECTS ON THE USE AND CONSERVATION OF ENERGY RESOURCES

The Proposed Action does not include design parameters which would qualify for LEED Certification as this would not meet the goals of the Applicant. However, the proposed buildings will meet all adopted energy codes for the State of New York.

For the development of the Project Site itself, in addition to satisfying mandates for erosion protections and the avoidance of the use of invasive species for landscaping, the Proposed Action will utilize native and adapted species to help support local fauna and limit reliance on irrigation.

Stormwater management will be a focus of the Proposed Action, with sufficient space to utilize green infrastructure for infiltration strategies returning water to the hydrologic cycle rather than processing using gray infrastructure technologies.

The buildings will be designed and constructed with strategies that help mitigate threats from pests such as termites or rodents, including maintenance space around foundations; sealing all cracks, joints and penetration joints with pest proof sealants; discharging stormwater away from foundations; and developing an integrated Pest Management policy to follow during design and into building operations.

11. CERTIFICATION

Upon consideration of the foregoing and the Draft and Final Environmental Impact Statements, the Town of Haverstraw Planning Board hereby certifies that:

1. The Planning Board has considered the relevant environmental impacts, facts, and conclusions set forth in the Draft and Final Environmental Impact Statements prepared in connection with the Proposed Action.
2. The Planning Board has weighed and balanced the relevant environmental impacts with the social, economic, and other essential considerations relating to the proposed project.
3. The requirements of 6 NYCRR Part 617 have been met.
4. Consistent with social, economic, and other essential considerations from among the reasonable alternatives available, the Proposed Action minimizes or avoids adverse environmental impacts disclosed in the EIS to the maximum extent practicable.
5. Adverse environmental impacts revealed in the EIS process will be minimized or avoided to the maximum extent practicable by incorporating as conditions to the decision the mitigation measures which have been identified in this Finding Statement as practicable.

Town Board of Haverstraw
State Environmental Quality Review Act (SEQRA)
Letchworth Road Residential Development Findings Statement
Adopted _____, 2026

Name of Lead Agency

Name of Responsible Official

Signature of Responsible Official

Title of Responsible Official

Date of Acceptance

Agency Address: Town of Haverstraw Planning Board
1 Rossman Road
Garnerville, NY 10923

cc:

Town of Haverstraw Town Board
Rockland County Planning Board
Town of Haverstraw Building Department
Town of Haverstraw Department of Public Works
Veolia Water New York, Inc.
North Rockland Joint Regional Sewerage Board

New York State Dept. of Environmental Conservation
New York State Historic Preservation Office
New York State Department of Transportation