



Town of Stony Point

AMY STAMM

OFFICE OF THE SUPERVISOR

74 EAST MAIN STREET
STONY POINT, NEW YORK 10980

TEL: (845) 786-2716 EXT. 111
www.stonypointny.gov



October 13, 2026

Walter Figueroa, Chair
Village of West Haverstraw Planning Board
West Haverstraw Municipal Center
130 Samsondale Avenue
West Haverstraw, NY 10993

RE: Grassy Point Bend Wholesale Storage and Warehousing Facility

Dear Chairman Figueroa:

The Town of Stony Point has reviewed the Draft Environmental Impact Statement for the Grassy Point Bend Wholesale Storage and Warehousing Facility. Thank you for incorporating many of our scoping concerns into the final scoping document and for assessing the environmental impacts—particularly traffic impacts—on the greater North Rockland community.

The Town of Stony Point respectfully submits that, although the project sponsor's DEIS and Traffic Impact Study meet the scope's minimum requirements and therefore qualified for a finding of "completeness" under SEQR, many of the assumptions, parameters, and methods employed understate or mischaracterize the project's practical transportation effects. In particular, the warehouse operating model, truck activity, route assignments, and congestion assumptions are not yet sufficiently supported.

Accordingly, we believe that the TIS neither satisfies SEQR's "hard look" requirement nor assesses the reasonably likely worst-case conditions resulting from the project. We have attached a technical review prepared by Nelson + Pope's traffic engineers that provides a more detailed assessment of the TIS and identifies deficiencies in its methods and conclusions. Nelson + Pope identified the following deficiencies:

- **Uncertain warehouse operations and truck demand:** The tenant and operating model are not identified, and peak-hour truck estimates alone do not establish total daily, overnight, loading, queuing, or noise impacts. The analysis should use the most intensive traffic generation parameters based on the full range of uses that would be permitted for the site and provide a full 24-hour truck profile and vehicle mix.
- **Unsupported truck and passenger-vehicle routing:** The assumed distributions may omit likely use of Route 9W between West Main Street and Filors Lane while assigning substantial truck

traffic to Grassy Point Road, River Road, and Beach Road without demonstrating that those local roads can safely and physically accommodate it.

- **Passenger trip distribution may not reflect actual route choice:** The journey-to-work model identifies trip origins but does not fully account for likely route selection under future No-Build congestion conditions. The assignment of approximately 58% of site traffic to Railroad Avenue—which requires motorists to traverse a failing through movement at Route 9W—should be justified or revised to account for motorists’ likely preference for routes with significantly lower delays, such as Willow Grove Road/Filors Lane and East Main Street.
- **Potentially understated effects on the Route 9W corridor:** Several intersections already operate at or near LOS E/F. Revised analyses are needed at Railroad Avenue, Filors Lane, Washburns Lane, Central Drive, and other affected locations to compare No-Build and Build conditions, including delay, truck effects, 50th- and 95th-percentile queues, storage, spillback, blockage, and mitigation, particularly if more conservative trip distribution movements are employed.
- **Railroad-crossing queuing and safety:** Gate closures can already produce long queues. A project-specific gate-down and post-opening analysis should evaluate truck storage and discharge, blockage of nearby intersections and access points, spillback toward Route 9W, the risk of vehicles stopping near the tracks, and effects on emergency access. The analysis should also assess whether motorists and truck operators experiencing frequent conflicts with scheduled Railroad Avenue closures would divert to River Road/Grassy Point Road/East Main Street as a route without railroad-crossing blockages.
- **Construction traffic management:** A formal plan is needed for construction access, truck routes, hours, worker parking, deliveries, staging, oversized vehicles, temporary traffic control, road cleaning, and measures preventing queuing, idling, or use of inappropriate residential streets.

The Town of Stony Point requests additional information either to substantiate the methods and modeling employed or to provide a more realistic and conservative analysis of future traffic impacts. We respectfully submit that the omissions and deficiencies are too significant to be addressed solely through responses to comments in an FEIS, particularly because revised analyses may disclose impacts not identified in the original DEIS. Accordingly, we request that the Planning Board require the submission of a revised TIS as part of a Supplemental DEIS. Doing so would provide the Town of Stony Point, involved agencies, and other interested persons an opportunity to comment on a more realistic assessment of potential traffic impacts and the suitability of any mitigation measures proposed by the project sponsor.

The Town of Stony Point also has the following concerns regarding the project as currently described in the DEIS:

1. Even if the assumptions and methods used in the current TIS prove justified, heavy truck traffic during nighttime and early-morning hours would have significant noise impacts on residents along the proposed truck routes, including River Road/Grassy Point Road/East Main Street. We therefore respectfully request that access to the site by large trucks be limited to daytime hours.
2. In the event of an extended closure of the Railroad Avenue crossing due to maintenance, equipment failure, or an emergency, additional truck and passenger-vehicle traffic may be diverted to local roads or directed north through Stony Point. The applicant should be required to prepare a contingency plan for extended railroad closures, including provisions requiring any site operator to temporarily suspend or significantly reduce heavy-vehicle access to the site.

3. Operations at facilities of this type may change over time. We therefore request that any project approval include enforceable parameters ensuring that future operations remain reasonably consistent with the applicant's representations during the SEQR review concerning overall traffic generation, truck traffic generation, route assignments, and hours of operation. To the extent permitted by your local codes, we further request that any approval be time-limited and subject to periodic renewal based on observed operating conditions. Even minor changes in the underlying assumptions could cause actual traffic impacts to diverge significantly from those predicted.

The Town of Stony Point thanks you for your attention to these potential impacts and for your stewardship of the North Rockland Community. A degree of caution and a more conservative approach to traffic modeling and mitigation can result in a better project for all.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy Stamm". The signature is fluid and cursive, with a long, sweeping underline.

Amy Stamm, Supervisor

CC: Robert D'Amelio, West Haverstraw Village Mayor
Howard Phillips, Haverstraw Town Supervisor
Ed Day, Rockland County Executive
Douglas Jobson, Rockland County Legislator – District 1
Paul Cleary, Rockland County Legislator – District 2
Jay Hood, Rockland County Legislator – District 3
Pete Harckham, New York State Senator – District 40
Chris Eachus, New York State Assemblyman – District 99
Skip Vezzetti, Rockland County Highway Superintendent
Julianne Fuda, Regional Director – District 8, New York State Department of Transportation

MEMO

To: Town of Stony Point
From: Osman Barrie, PE, PTOE, PTP
Date: October 06, 2026
Project: Proposed Warehouse Development – 190 East Railroad Avenue, Village of West Haverstraw, Rockland County, New York
N+P No: 17029
Subject: Traffic Study Review Comments

Nelson + Pope reviewed the October 1, 2025, Traffic Impact Study for the proposed 454,250-square-foot warehouse/distribution development at 190 East Railroad Avenue in West Haverstraw on behalf of the Town of Stony Point.

The review focuses on practical off-site transportation impacts that could affect Stony Point, including truck and employee traffic, truck routing, traffic congestion, railroad-crossing conditions, impacts to nearby residential areas, and potential mitigation measures. The study was also reviewed for any significant assumptions or technical issues that could affect the evaluation of project-related traffic within the Town.

The following comments identify items requiring additional information, clarification, revised analysis, or mitigation.

1. Warehouse Operating Characteristics and Truck Activity

The TIS analyzes the project as ITE Land Use Code 150, “Warehousing,” but the anticipated tenant and specific operating model are not identified. Traffic characteristics can differ materially among conventional warehouses, fulfillment centers, last-mile distribution facilities, cold-storage operations, parcel-delivery facilities, and high-cube distribution centers. If the tenant/operation remains unknown, the analysis should use the most intensive reasonably permitted warehouse/industrial scenario so that vehicle and truck demand is not understated.

The TIS identifies 9 truck trips in the weekday AM peak hour, 24 in the midday peak hour, and 14 in the weekday PM peak hour. Peak-hour values alone are not sufficient to understand practical truck impacts. The applicant should provide:

- Total weekday truck trips and the hourly distribution over a full 24-hour period, including the maximum truck hour and anticipated overnight activity.
- The expected mix of tractor-trailers versus smaller delivery trucks, together with proposed loading/unloading hours.
- Sufficient information to evaluate truck queuing, noise, off-peak/overnight activity, interaction with nearby residences, and potential interaction with railroad operations.

2. Project Trip Distribution and Route Assignment

The current truck distribution assigns approximately 77% of inbound truck traffic from the south on Route 9W, turning onto Railroad Avenue, with the same approximate share outbound in the reverse direction. The remaining approximately 23% is routed from the north via East Main Street, Grassy Point Road, River Road, and Beach Road. The TIS also routes all north-origin passenger traffic through the local roadway network rather than continuing south on Route 9W. These assumptions require further support and, as appropriate, revision.

Of particular concern, the analysis assigns no project-generated traffic to Route 9W between West Main Street and Filors Lane, although the TIS truck-route map and commonly available commercial GPS routing identify Route 9W as a potential truck route. Likewise, assigning approximately 23% of warehouse truck traffic to Grassy Point Road, River Road, and Beach Road warrants a documented suitability assessment because these local roads may present width, geometry, intersection, roadside, residential, bridge/weight, or other operating constraints.

The revised routing analysis should, at a minimum:

- Evaluate the likelihood of project-generated trucks and passenger vehicles using Route 9W between West Main Street and Filors Lane, considering the designated truck network, travel time/distance, roadway classification and geometry, congestion, and commercial GPS/navigation routing.
- Document the suitability of Grassy Point Road, River Road, and Beach Road for the anticipated truck size and frequency, including lane/roadway widths, horizontal and vertical geometry, turning constraints, posted restrictions, bridge/weight restrictions, adjacent land uses, and other relevant physical conditions.
- Provide clear justification for assigning approximately 23% of project trucks to the local-road route rather than continuing on Route 9W, and identify how any intended truck-routing plan would prevent or effectively discourage use of inappropriate local/residential streets.
- Revise the truck and passenger-vehicle distributions using a reasonable, supportable methodology and update the affected capacity analyses at Route 9W/Central Drive, Washburns Lane, and Filors Lane. Unless adequately demonstrated otherwise, an appropriate share of project traffic should be assigned to these Route 9W intersections.

3. Justify Passenger Vehicle Trip Distribution

The TIS used a Journey-to-Work Model based on 2019 Census data to determine passenger vehicle trip distribution. As shown on Figure 6A, approximately 58% of the site-generated traffic is assigned to the eastbound Railroad Avenue approach at Route 9W. This appears to assume that a substantial portion of traffic originating from the south and west would use the Palisades Interstate Parkway, exit at Exit 13 (Thiells Mt. Ivy Road), and continue eastbound on Railroad Avenue.

The Engineer should clarify whether existing and projected traffic conditions were considered in determining route choice. While Census Journey-to-Work data may identify where employees originate, it does not necessarily determine the routes they would use. For example, under the 2029 No-Build condition, the eastbound through/right turn movement at Route 9W/Railroad Avenue is projected to operate at LOS E with approximately 67 seconds of delay during the AM peak hour and operate at LOS F with approximately 98 seconds of delay during the PM peak hour, while alternative movements along the Route 9W corridor operate at LOS C or better.

Given these conditions, some motorists may remain on the Palisades Interstate Parkway and use the Willow Grove Road/Filors Lane route or East Main Street rather than travel through the congested Route 9W/Railroad Avenue intersection. Therefore, assigning approximately 58% of the site-generated passenger traffic to eastbound Railroad Avenue may not realistically reflect commuter route choice.

The Engineer should justify this assignment or revise the distribution to assign an appropriate portion of the traffic to alternative routes, including Willow Grove Road/Filors Lane and East Main Street, and reevaluate the resulting impacts at the affected intersections.

4. Route 9W Corridor Operations — Practical Build Effects

The revised operational analysis should reflect realistic project traffic assignments and should evaluate practical operating effects, not only average delay and LOS. At intersections already operating at or approaching LOS E/F, a relatively small change in average delay may translate into meaningful increases in queue length, storage demand, spillback, blockage, or truck-related operational effects.

Intersection	Observed / Reported Condition	Required Revised Evaluation
Route 9W / Railroad Avenue	Existing overall LOS D during several periods; eastbound through/right LOS E in the weekday PM and Saturday midday. 2029 No-Build: eastbound and westbound through/right LOS E in the AM; eastbound through/right LOS F and overall intersection LOS E in the PM. The current Build assignment does not appear to route southbound project trucks/passenger vehicles through the intersection.	Reassign realistic project traffic and compare No-Build vs. revised Build volumes, delay, LOS, 50th/95th queues and storage. Confirm turn lanes/storage can accommodate additional tractor-trailers without blocking through lanes or other movements; evaluate truck acceleration, deceleration, turning and vehicle-length effects.
Route 9W / Filors Lane	Under the presented Build condition, the westbound movement deteriorates from LOS D to LOS E during Saturday midday, with about 55.0 seconds of delay, even without southbound project traffic assigned through the intersection.	Include an appropriate share of southbound project traffic unless its exclusion is demonstrated. Identify project volumes (trucks/passenger vehicles as appropriate), lane-group delay/LOS, 50th/95th queues, available storage, spillback/blockage potential, and the incremental project-related effect. If a meaningful project impact results, evaluate mitigation.
Route 9W / Washburns Lane	The TIS documents LOS E/F conditions, while certain poorly performing movements receive no project-generated traffic under the current assignment.	Revise the truck/passenger assignment to reflect realistic travel patterns. If trucks are excluded, identify designated truck routes and the basis/enforcement strategy for that exclusion. Provide revised No-Build vs. Build volumes, delay, LOS and queues and assess potential spillback/diversion to local roads.

For each affected location, the applicant should identify where queues may extend through upstream intersections, driveways, or access points; compare available storage with predicted queues; and confirm that project-generated tractor-trailers can be physically accommodated without obstructing adjacent traffic. A direct No-Build versus Build comparison should make the incremental project effect readily apparent.

5. Railroad Crossing and Railroad Avenue Operations

The TIS notes that when the Railroad Avenue crossing gates are lowered, queues can extend west beyond Samsondale Avenue and interfere with eastbound right-turning traffic onto Samsondale Avenue. This existing condition warrants project-specific analysis because trucks consume substantially more queue storage and discharge more slowly than passenger vehicles.

The applicant should provide a detailed railroad-crossing evaluation that documents gate-closure frequency and typical duration, existing typical and maximum queues, and available roadway storage.

Future conditions should then be evaluated with project-generated traffic, particularly trucks, to determine whether queues could extend into adjacent intersections, interfere with access along Railroad Avenue, or spill back toward Route 9W.

A supplemental operational scenario should evaluate both (1) the gate-down condition, with existing and project traffic accumulating in the queue, and (2) the period immediately after the gates reopen, when the accumulated queue discharges toward Route 9W. The analysis should address queue lengths/storage, intersection blockage, truck discharge/acceleration characteristics, spillback, and potential conflicts with nearby intersections.

The safety review should also determine whether congestion could result in vehicles or trucks stopping on or too close to the tracks and whether emergency access could be affected during gate closures. Appropriate measures such as signage, pavement markings, treatments, or other traffic-control improvements should be identified where warranted. This railroad-closure scenario should supplement, not be replaced by, the conventional peak-hour Synchro analysis.

6. Construction Traffic Management

Given the scale of the proposed 454,250-square-foot warehouse, the applicant should prepare a Construction Traffic Management Plan addressing temporary worker traffic, material deliveries, heavy trucks, and construction equipment. The plan should include:

- Construction access points and designated truck routes; construction hours and estimated construction traffic; worker parking and on-site truck staging.
- Material/equipment deliveries, including oversized vehicles; measures to prevent queuing or idling on public roads; temporary traffic control and pedestrian-safety measures.
- Road cleaning/debris removal and measures to prevent construction trucks from using residential or otherwise inappropriate local streets.

The plan should demonstrate that construction traffic, parking, deliveries, and staging can be accommodated without creating significant impacts on the surrounding roadway network or nearby residential areas.