

Applicant

Dr. Radwa Saad
AKA Premier Dental Certs

Appl. No.


ZB-2/21 + SP-1/21

REFERRALS

	Date		Date		Additional Reports
	Referred	Dated	Referred	Dated	
a. Municipal Engineer	5/20/21	6/25/21	8/23/21	8/26/21	
b. Professional Planner	5/20/21	7/14/21	8/23/21	9/21/21	
c. Traffic Consultant	5/20/21	6/30/21	8/23/21	9/15/21	
d. Construction Official	5/20/21	—	8/23/21	8/26/21	
e. Shade Tree Advisory Comm.	5/20/21	6/28/21	8/23/21	—	
f. Health Officer	5/20/21	6/4/21	8/23/21	8/31/21	
g. Tax Collector	5/20/21	5/21/21	—	—	
h. Public Safety	5/20/21	8/10/21	8/23/21	—	
i. Environ. Res. Committee	5/20/21	7/6/21	8/23/21	9/15/21	
j. Mercer County Planning Bd.					
k. Ewing-Law. Sewer Auth.					
l. _____ Water Co.					
m. D & R Canal Commission					
n. U.S. Post Office					
o. NJDOT		5/25/21			
p. PSE&G Co.					
q. Board of Education					
r. Historic Preserv. Comm.	6/23/21	7/13/21			
s. NJDEPE/Wetlands					
t. NJDEPE/Stream Encroach.					
u. <u>Greg Whitehead</u>	5/20/21	—	8/23/21		
v. _____					
w. _____					
x. _____					
y. _____					
z. _____					

Township of Lawrence
ENGINEERING DEPARTMENT

TO: File

FROM:  Brenda Kraemer, Assistant Municipal Engineer

SUBJECT: Use and Bulk Variance Application No. ZB-2/21
Major Site Plan – Preliminary & Final Approval Application No. SP-1/21
Dr. Radwa Saad, DMD (Premier Dental Arts), 3640 Lawrence Road
Tax Map Page 67.02, Block 6701, Lot 1

DATE: August 26, 2021

General:

The applicant has requested use variance and site plan approval to convert the existing residence at 3640 Lawrenceville Road into a dental office. The property is located in the EP-1 Zone and is used as a single family residence with a home occupation medical use. A home occupation is limited in size and scope and must be owner occupied. The applicant has requested conversion to a full medical office with eight (8) employees and seven (7) treatment rooms.

The EP-1 District is primarily residential and commercial uses are not permitted. Our concerns with the application include impact of an office on adjacent residential properties, Kings Highway and the Lawrence Township Land Use Ordinance. Planning testimony is needed. This report has been updated per the revised submission received in August. The revisions include a reduction in the number of treatment rooms from 10 to 7 and inclusion of landscape buffering along the property lines. The existing improvements in the right-of-way have been noted to be removed.

The following issues shall be addressed:

1. Staff, expected number of patients and hours of operation shall be discussed. Intensity of use will increase with conversion from a residential property with a home occupation to a full commercial use.
2. The property is adjacent to the Kings Highway Historic District. The application has been referred to the Historic Preservation Advisory Committee for comments. The impact on the viewshed shall be addressed in testimony. The Historic Preservation Advisory Committee has recommended relocation of the dumpster area.
3. It appears that a new septic system and improvements to the private well will be necessary. We will defer to the Health office for review.

Technical engineering items are listed below.

Detailed Report:

1.00 Site Layout

- 1.01 The application documents state that there will be eight (8) staff and eighteen (18) patients expected on a daily basis. As the plans show seven (7) treatment rooms, it is questionable whether the number of patients is under estimated, which leads to intensity of use issues. The property is located in a residential zone that was not envisioned for conversion to commercial uses. Medical offices are permitted in many other districts in the Township including overlay districts.

The applicant's planning testimony shall address site suitability, site selection and impact on adjoining residential uses. If a use variance is granted, any future owner would be able to operate a medical office.

- 1.02 Testimony shall be provided regarding the impact of the proposed project on the Kings Highway Historical District. The Historic, Element Preservation of the Master Plan was updated in 2019 and notes the importance of this corridor.
- 1.03 The existing fence is in disrepair and according to the plans, is located within the right-of-way. The existing sign at the intersection of Lawrenceville Road and Province Line Road is also within the right-of-way. Both items are noted to be removed.
- 1.04 We will defer to the Planning Consultant for review of the landscape buffering.
- 1.05 The trash enclosure shall be masonry. Truck turning maneuver information shall be provided to verify accessibility. The diagrams provided do not show the truck accessing the dumpster area. Both trash and recycling services must be contracted privately. The Township does not provide this service for commercial properties.

Screening of the enclosure area shall be provided. Note that the Historic Preservation Advisory Committee has recommended relocation.

- 1.06 The plans show the installation of seven (7) additional parking spaces, although all spaces are not required per the Lawrence Township Land Use Ordinance. Justification for two extra spaces is required. The Board may wish to consider eliminating any additional parking spaces.

In addition, the applicant's engineer shall explain why the impervious surface coverage decreased on the current of plans. Previously a variance was noted and porous pavement was recommended.

2.00 Miscellaneous

- 2.01 The sunroom has not been included as part of the proposed project. The use shall be discussed. It cannot be converted to medical use in the future.
- 2.02 The "No Left Turn" sign at the Lawrenceville Road exit shall be discussed as to the need for the sign.
- 2.03 Other permits / approvals:
- a. Mercer County Planning Board
 - b. New Jersey Department of Transportation (letter of no interest)
 - c. Historic Preservation Advisory Committee
 - d. State Historic Preservation Office (or letter of no interest)
 - e. Lawrence Township Soil Disturbance (prior to site construction)

BK/sjs

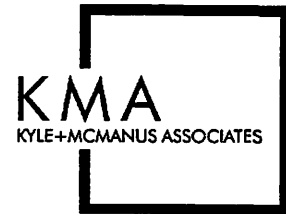
g:engineering/saad, dr./review #2.doc

Documents Reviewed:

- Application Nos. ZB-2/21 and SP-1/21 with Supplement to Application
- Blue Heron Water Treatment & Well Service, dated August 3, 2021
- Garden State Laboratories Report, dated August 6, 2021
- On-site System Inspection Form, undated
- Cella's Septic Company Report, dated July 20, 2021
- Title Sheet, Sheet Y-1, revision dated July 19, 2021
- Existing Condition Plan, Sheet Y-2, revision dated July 19, 2021
- Dimension Plan, Sheet Y-3, revision dated July 19, 2021
- Grading Plan, Sheet Y-4, revision dated July 19, 2021
- Landscaping Plan, Sheet Y-5, revision dated July 19, 2021
- Cover Sheet, Sheet CS, revision dated July 30, 2021
- Existing Conditions, Sheet EX1.1, dated April 4, 2021
- Existing Elevations, Sheet EX2.1 and EX2.2, dated April 4, 2021
- Proposed Plan, Sheet A1.1, revision dated July 30, 2021
- Proposed Elevations, Sheet A2.1, dated April 4, 2021

September 21, 2021

Lawrence Township Zoning Board of Adjustment (via e-mail)
2207 Lawrenceville Road
PO Box 6006
Lawrence Township, NJ 08648



POLICY
PLANNING
DESIGN

**Re: Dr. Radwa Saad, DMD
Block 6701, Lot 1 – 3640 Trenton-Princeton Road (SR 206)
D(1) Use Variance Relief and Site Plan Approval
EP-1 Environmental Protection District**

Dear Board Members:

Pursuant to the Board's request, we have reviewed the above captioned matter for compliance with the Land Use Ordinance of the Township of Lawrence. Throughout this review, you will note updated and information noted in **bold letters**. The material reviewed, as supplied by the applicant, included the following:

1. Township of Lawrence Land Use Application Master Checklist, dated April 16, 2021, **last revised on August 11, 2021.**
2. Supplement to Application of Dr. Radwa Saad, DMD, undated.
3. Township of Lawrence Use Variance Application, undated.
4. Existing and proposed signage requirements, including details of proposed signage, undated.
5. Proposed/Anticipated Witness List, undated.
6. Request for NJDOT Letter of No Interest, prepared by Matthew Seckler, PE, PP, PTOE, of Stonefield Engineering and Design, LLC, dated March 25, 2021.
7. Land Use Ordinance Table 8.2 Submission Checklist, undated.
8. Township of Lawrence Bulk Requirements Table for the EP-1 District, undated.
9. Preliminary and Final Site Plan for Smiles Real Estate, LLC, prepared by Mohammed El-Hawwat, PE of Meh Consulting Engineers, Inc., dated March 29, 2021 and last revised **July 19, 2021** consisting of 5 sheets.
10. Architectural Plans for Premier Dental Arts, prepared by the Lion & Crown Architecture and Design, dated April 4, 2021 and last revised **July 30, 2021** consisting of 6 sheets.
11. **Well inspection report from Blue Heron Water Treatment & Well Service, LLC, dated August 3, 2021.**
12. **Bacteriological and Chemical Testing Report from Garden State Laboratories, Inc., dated August 6, 2021.**
13. **Onsite System Inspection Report from Cella Septic Company, dated July 20, 2021.**

Based on the information provided with the submission, the applicant seeks use variance and site plan approval to convert an existing single-family dwelling that included a chiropractic office in the basement into a dental office. It does not appear there will be any residential component to the use. According to the architectural plans, the entire first floor of the existing dwelling will be fit out with 7 treatment rooms, a staff area, an office, reception desk, a consultation room, a **laboratory** and a waiting area. Separate staff and patient entries are proposed. A total of 17 parking stalls are proposed, including one handicapped-accessible stall, along with a trash enclosure. The applicant proposes to convert the existing residential swimming pool into a koi pond.

The subject property, known as Block 6701, Lot 1 with a street address of 3640 Trenton-Princeton Road (State Route 206), is located in the southwest corner of the intersection of Route 206 and Province Line Road. Totaling 3.261 acres, the site has 493' of frontage along Route 206 and 500' of frontage along Province Line Road. At present the site contains an existing 1 story frame dwelling, a pool, parking area, fencing, an existing freestanding sign and lighting. Access is provided via two driveways, one from Route 206 and the other to Province Line Road, both of which are gated. Site inspection on 7/13/2021 revealed the presence of a trailer, a sea box and various items that appear to be associated with a landscaping business. **The revised site plan now indicates the sea box and concrete pad are to be removed.** All immediately surrounding uses are residential in nature.

Zoning

The subject property is located in the EP-1 Environmental Protection District, which permits agriculture, farmsteads, single family detached dwellings, residential clusters, public parks and recreation, conservation, municipal use and cemeteries. Accessory uses permitted include private residential swimming pools and cabanas, private residential tool sheds, recreational vehicle storage, outdoor recreation facilities, off-street parking and private garages, fences and walls, decks and patios, signs, home occupations, accessory apartments, ECHO housing, satellite dishes and television antennas, farm stands and consumer crop picking operations and other accessory uses customarily incidental to a principal use. The district conditionally permits public and private day schools, public and private golf courses, farm markets, bed and breakfast accommodations and child care centers.

As the proposed dental office is not among the permitted or conditionally permitted uses in the EP-1 District, a d(1) variance to permit "a use or principal structure in a district restricted against such use or principal structure" in accordance with the New Jersey Municipal Land Use Law, N.J.S.A. 40:55D-70d(1) is required.

The table on the following page lists the bulk requirements for the EP-1 District and compares them to the applicant's proposal. As noted, the existing lot is nonconforming as to minimum lot area and maximum impervious coverage. The applicant is seeking a bulk variance to further exceed the maximum permitted impervious surface ratio, **although the proposed maximum impervious surface coverage has been reduced by 0.98%.** We also note that §401.F.6.a

prohibits accessory buildings or uses in the front yard. As the proposed dumpster enclosure is within the front yard, a bulk variance is required.

	Required	Existing	Proposed
Minimum Lot Area	4 acres	3.261 acres*	3.261 acres*
Minimum Lot Frontage	200'	493.53'	493.53'
Minimum Front Yard	100'	125.15'	125.15'
Minimum Side Yard	50'	152.45'	152.45'
Minimum Rear Yard	50'	N/A	N/A
Minimum Acreage Exclusive of Critical Areas	1 acre	N/P	N/P
Minimum Usable Yard Area	20% of each yard	N/P	N/P
Maximum Impervious Surface Ratio	.10	11.28%*	11.56%**

N/A – not applicable N/P – not provided

* denotes existing nonconforming condition

**denotes variance required

Use Variance Considerations

Relative to the use variance sought, the applicant must demonstrate both the positive and negative criteria. For the positive criteria, the applicant must show that the public welfare is promoted because the site is particularly suited to the proposed use, and that special reasons exist for the grant of the variance. Special reasons are generally derived from the purposes of the New Jersey Municipal Land Use Law, N.J.S.A. 40:55D-2. Note that as to the particular suitability of a site, the Court in Price v. Himeji, 214 N.J. 263, 292-292 (2013) clarified that an applicant need not show there are no other viable locations for the use but must rather show the characteristics of the site that make it uniquely suited to the use proposed. As to the negative criteria, the applicant must show the variance can be granted without substantial detriment to the public good, and that it will not substantially impair the intent and purpose of the zone plan and zoning ordinance. The enhanced quality of proof required by the Court in Medici v. BPR Co. must also be addressed. In this regard the applicant must demonstrate, and the Board must specifically find, that the grant of the variance is not inconsistent with the intent and purpose of the zone plan and zoning ordinance, proof that reconciles the governing body's continued omission of the use among those permitted in the EP-1 Environmental Protection District.

With respect to substantial detriment to the public good, the Board must consider potential impacts to surrounding properties that could result from the grant of a use variance for the proposed dental office. On impact to surrounding properties, the Board should keep in mind the term "substantial detriment". Any application for a use not permitted in a particular zone district is likely to have some impact on surrounding properties. The question is whether that impact rises to the level where it could be considered "substantial", potentially altering the character of the neighborhood in a significant way. We note that while the current owner at one time had a chiropractic office in the basement as a home occupation, the area devoted to such use was limited. The scope of the current proposal far exceeds the medical office use that previously existed. Relative to impact to surrounding properties, the Board should consider the following:

- Hours of operation of the office and the days of the week on which operations will occur

- Total number of employees, including total number of dentists
- Total daily vehicle trips (the NJDOT Request for Letter of No Interest notes 100+ daily trips)
- Frequency of delivery vehicles and trash pickups
- The nature of existing lighting
- Proximity of adjacent residential uses and potential visibility of the parking area
- Proposed landscape screening intended to address potential negative impacts of the proposed use

As to the intent and purpose of the zone plan and zoning ordinance, the Land Use Ordinance, §401A notes the purpose of the Environmental Protection 1 (EP-1) District as follows:

“Purpose. The Environmental Protection 1 district is designed for low intensity uses primarily in the northwest area of the municipality where poor water yields and strata for septic systems dictate large lot development in an area of little or no public infrastructure and severe environmental constraints, including but not limited to, a seasonal high water table, shallow depth to bedrock, and steep slopes along the Stony Brook. Further, the purpose of the EP-1 district is to protect the environmental resources and qualities of this area, maintain the rural character of roads and scenic views, and retain farmland. The EP-1 designation is contrasted with the EP-2 district by being underlain with the Lockatong-Argillite geologic formation as depicted in the adopted Master Plan. Both the EP-1 and EP-2 districts, though poorly suited for development, are exceptional areas for non-irrigated agriculture. Because of this last factor, clustering of residential units is preferred whether under the provisions of this section or §428.”

The Land Use Ordinance also contains a statement of intent and purpose in §102, which is reproduced below. We have highlighted (in bold) certain items that may be relevant to the Board’s consideration of the matter at hand. The applicant will need to focus on reconciling the bold items and in particular focus on the intent of discouraging small-scale office development outside of neighborhood commercial areas, which this proposal appears to be directly contrary to. Discussion of potential impacts to the King’s Highway Historic District, which the site abuts, should also be addressed.

- A. To guide the appropriate use or development of all lands in a manner that will promote the public health, safety, morals and general welfare;**
- B. To secure safety from fire, flood, panic and other natural and manmade disasters;
- C. To provide adequate light, air and open space;
- D. To ensure that the development of the Township of Lawrence does not conflict with the development and general welfare of neighboring municipalities, the county and State as a whole;
- E. To promote the establishment of appropriate population densities and concentrations that will contribute to the well-being of persons, neighborhoods, communities and regions and preservation of the environment;
- F. To encourage the appropriate and efficient expenditure of public funds by the coordination of

public development with land use policies;

G. To provide sufficient space in appropriate locations for a variety of agricultural, residential, recreational, commercial and industrial uses and open space, both public and private, according to their respective environmental requirements in order to meet the needs of all New Jersey citizens;

H. To encourage the location and design of transportation routes which will promote the free flow of traffic while discouraging location of such facilities and routes which will result in congestion or blight;

I. To provide a desirable visual environment through creative development techniques and good civic design and arrangements;

J. To promote the conservation of historic sites and districts, open space, energy resources and valuable natural resources and to prevent urban sprawl and degradation of the environment through improper use of land;

K. To encourage planned unit development which incorporates the best features of design and relate the type, design and layout of residential, commercial, industrial and recreational development of the particular site;

L. To encourage senior citizen community housing construction;

M. To encourage the coordination of various public and private procedures and activities shaping land development with a view of lessening the cost of such development and to the more efficient use of land;

N. To promote utilization of renewable energy sources;

O. To promote the maximum practical recovery and recycling of recyclable materials from municipal solid waste through the use of planning practices designed to incorporate the State Recycling Plan goals and to compliment municipal recycling programs;

P. To discourage the creation of additional highway commercial uses except in areas specifically designated on the zoning map and to encourage mixed use neighborhood centers;

Q. To discourage small scale office development outside of designated neighborhood commercial areas;

R. To encourage, within areas identified in the Master Plan, a mixture of land uses that facilitate non-vehicular and pedestrian access;

S. To place higher density housing only in areas:

1. With sufficient capacity in the transportation system;
2. With access to public transit;
3. Near shopping and other personal convenience services, and;
4. In locations with public sewer and water;

T. To maintain traditional architectural forms in higher density housing by utilizing the highest possible design standards.

U. To plan adequately for the timely provision of new community facilities, including but not limited to:

1. Firehouses;
2. Schools;
3. Community Centers;
4. Parks;
5. Bicycle lanes and pedestrian paths;

- 6. Municipal facilities; and
 - 7. Public transit.
- V. To encourage the redevelopment of existing underutilized or abandoned lands and buildings;
- W. To promote the redevelopment of the commercial core of the village of Lawrenceville through coordinated parking, streetscape improvements, signage, and lighting in keeping with the historic character of this district;
- X. To preserve and enhance historic buildings, places and landscapes, encourage the maintenance of traditional architectural forms in buildings, and retain rural road characteristics, including but not limited to the following areas:**
- 1. Delaware and Raritan Canal and associated areas;**
 - 2. Port Mercer;**
 - 3. The Lawrenceville School;**
 - 4. Lawrenceville Village;**
 - 5. Sites designated on State and National Registers of Historic Places; and**
 - 6. Adjacent or nearby sites that by their proximity to listed places influence the nature of historical places.**
- Y. To establish design standards to encourage the construction of new buildings to complement the style and scale of existing buildings;
- Z. To protect environmentally sensitive lands from development or other potentially damaging influences and to control the clearing of land that would adversely affect threatened or endangered plant and animal species;
- AA. To promote the preservation of natural features during land development;
- BB. To preserve remaining farmland and rural areas, through:
- 1. Transfer of development credits from farmland into appropriate receiving areas;
 - 2. Residential clustering in areas adjacent to agriculture;
 - 3. Use of traditional rural design in roadways and landscaping;
 - 4. Limiting the extension of public sewers to areas suitable for more intensive development; Land Use Ordinance
- CC. To encourage open space dedications in the development review process to maximize the quantity and quality of such land in accordance with the criteria in the adopted Township Master Plan, and provide improved access to existing parks;
- DD. To create a Greenway Network to preserve and enhance existing stream corridors, connecting parks and conservation areas and using the Network for pedestrian and bicycling in areas capable of supporting such activity;
- EE. To promote the visual improvement of the Township's major arterials by the coordination of visual design and character of signage, planting additional street trees, and requiring on-site landscaping improvements during the redevelopment review process.
- FF. To improve streetscapes in existing residential areas, non-residential and rural areas, through:
- 1. Installing a row of street trees, or a double row where possible, on all collector and arterial roads;
 - 2. Using textured materials for sidewalks and crosswalks;
 - 3. The use of decorative fencing as a landscape design element in multi-family housing developments;
 - 4. The installation of hedges and hedgerows; and

5. Requiring underground utilities in development and redevelopment.

GG. To discourage the widening, except for safety purposes or bicycle lanes, of existing collector, subcollector and residential access roads in existing developments and where rural development patterns are present, restricting new residential roads to two lanes, preserving the level of service by reducing curb cuts and discouraging speeding by the use of traffic calming measures.

HH. To encourage the coordination of development through the connection of commercial properties by easement and physical improvement.

II. To help retain existing rural character by designing new rural roads with two lanes, narrow shoulders, drainage ditches and hedges or hedgerows;

JJ. To decrease the visibility and extent of parking lots and access driveways by:

1. Requiring the installation of landscaped traffic islands in parking lots;
2. Screening parking lots from the traveling public and adjacent residents by a combination of landscaping, berming, walls and fencing; and
3. Reducing the required number of parking spaces in pedestrian-oriented development and redevelopment.

KK. To provide for the conservation and, where appropriate, the improvement of the entire length of the Delaware and Raritan Canal State Park to the extent possible by municipal government and assure that the development of adjoining properties protects and enhances the resources and qualities of the Canal Park;

LL. To provide for the redevelopment of Alternate Route 1 (Brunswick Pike) south of Colonial Lake, by promoting a commercial boulevard through the reduction of cartway width, an increase in the median area and improvements to paving, landscaping, building facades, signage and lighting.

MM. To provide, to the greatest extent feasible, the natural control of storm water from land development while preserving the existing contours and natural features of the site; restrict development on steep slopes to reduce negative impacts on stream bank stability and to control erosion.

The Township's 1995 Master Plan sets forth a number of goals and objectives, and subsequent reexaminations of the Master Plan have not significantly altered those policy statements. Those that are potentially relevant are noted below.

- Community Character goal -Maintain the predominantly residential nature of the municipality.
- Community Character objective – Limit highway-oriented commercial land uses in the Township and confine them to existing commercial areas.
- Land Use goal – Foster a well balanced, diverse community with a mix of residential housing types, institutional, commercial, and limited industrial uses along with ample open space and public facilities. The land use plan and development regulations are designed to minimize land use conflicts and to reduce adverse impacts of development on other activities in the Township.
- Land Use objective - Discourage the introduction of incompatible land uses.

Consideration of Bulk Variances

The applicant is requesting bulk variance relief related to maximum impervious surface ratio **and to locate an accessory use and structure in the front yard**. The Board has the power to grant c(1) or hardship variances “(a) by reason of exceptional narrowness, shallowness or shape of a specific piece of property, (b) or by reason of exceptional topographic conditions or physical features uniquely affecting a specific piece of property, or (c) by reason of an extraordinary and exceptional situation uniquely affecting a specific piece of property or the structure lawfully existing thereon, the strict application of any regulations...would result in peculiar and exceptional practical difficulties to, or exceptional and undue hardship upon the developer of such property.” The Board may also consider the grant of c(2) variances where the purposes of the New Jersey Municipal Land Use Law would be advanced and the benefits of the deviation would substantially outweigh any detriment. In either case, the Board cannot grant “c” or bulk variances unless the negative criteria are satisfied, or that there is no substantial impact to surrounding properties (first prong) and the grant of the variance will not cause substantial impairment to the intent and purpose of the zone plan (master plan) or zoning ordinance (second prong).

At present the lot has more impervious surface coverage than permitted for the district and the applicant proposes to increase it from 11.28% to **11.56% (0.28%)**. This represents an increase of **398** square feet over existing coverage and a total departure of **2,216** square feet versus the 10% maximum permitted in the EP-1 District. We note there are likely ways to reduce impervious coverage, mainly through reduction of excess parking (**15 spaces required versus 17 proposed**) or removal of unused concrete areas, that would eliminate the variance. Otherwise the applicant should address mitigation of the increase sought in order to reduce potential negative criteria concerns.

Site Plan Considerations

1. §525, Table 5.10 requires a minimum buffer of 25' between professional office uses and single family uses. In consideration of the existing 6' solid fence **along the southern property line**, the buffer may be reduced to 20', and the minimum required plant types per 100 lineal feet may be reduced by 20%. The buffer must include 4 large or medium trees, 7 small or ornamental trees, 12 evergreens and conifers and 24 shrubs per 100 lineal feet. Along the western property boundary, as only deer fence exists the 25' buffer is required. **This buffer must include 5 large or medium trees, 8 small or ornamental trees, 15 evergreens and conifers and 30 shrubs per 100 lineal feet.** Existing vegetation within the required buffer area can be counted towards these requirements. **While the applicant has provided landscape buffering along the western and southern boundaries of the property, the required plant density requirements do not appear to be met. Compliance may be better achieved and demonstrated by developing 100' modules meeting plant density requirements and applying them where required.**
2. As noted in the engineering review, the 6' wood fence that was installed along Route 206 and Province Line Road is within the right of way of both roadways and will have to be relocated. **The revised plans now propose removal of the fencing from the right of way, and no replacement appears to be proposed.**

3. The prior site plan indicated the existing sign at the corner of Route 206 and Province Line Road was to remain and be updated with the new owner information. As noted in the engineering review, this sign is within the right of way. **The revised site plan indicates the freestanding sign at the corner is to be removed.**
4. Sight easements should be established at the driveway locations and fencing should be arranged so as not to obstruct safe view for drivers exiting the site. **The revised plans indicate a "sight triangle distance" at each driveway in both directions, however it is unclear if this is the sight line or the limit of an easement. This should be clarified by the applicant's engineer.**
5. Table 5.16 requires 1 parking space per 1,000 square feet of floor area for dental offices. With 2,942 square feet of office area proposed, 15 spaces are required whereas the applicant proposes 17 spaces, including one handicapped-accessible stall. Given the impervious coverage variance sought, a reduction to 15 spaces should be considered or other impervious areas should be removed. **Removing 2 parking stalls in the row of 10 could save 324 square feet of coverage and limit the increase sought to 74 square feet.**
6. The applicant should provide a lighting plan in accordance with the requirements outlined in §527. As the existing fixtures are proposed to remain, light levels should be assessed for compliance with the ordinance to ensure there is no adverse impact to adjacent residential uses. There is **still** not enough information provided to determine compliance at this time.
7. The applicant proposes a total of **3** signs, **two** freestanding signs each 10 square feet in area and one façade sign above the patient entrance on the north side of the building. In accordance with §535.U.3, commercial uses in the EP-1 District are permitted one freestanding sign not to exceed 10 square feet in area or 4' in height and one directory sign attached to the façade of the building. Design waivers are required to permit the one additional freestanding sign and the proposed façade sign. **Details should be provided for the proposed façade sign.**
8. §538.B requires trash enclosures to be separated from parking spaces and obscured from view of parking areas, streets and adjacent residential uses by a fence, wall, planting or combination of the three. **The revised plans now depict landscape buffering around the proposed trash enclosure and additional separation from the parking area is proposed.**
9. A trash enclosure consisting of board-on-board fence and gate is proposed. We note §538.C requires exterior solid waste enclosures to be constructed of masonry compatible with the architectural materials of the building. A waiver is therefore required.
10. **The applicant's team should discuss the overall benefit and need for two driveways to service the site. Eliminating the driveway to Route 206 would further reduce impervious coverage on the site and bring it closer to conformance with the 10% maximum impervious surface ratio permitted in the EP-1 District. We note that left turns are proposed to be restricted at this driveway, and visitors to the site can utilize a single driveway to Province Line Road and still gain easy access to Route 206 south.**
11. **With removal of the solid fencing along the right of way, the structure and parking area will likely be more visible to adjacent properties and passing motorists. Additional buffering should be provided on the northern boundary of the parking area to limit view of parked cars.**
12. The septic and well inspection reports recommend replacement of both systems.

Consideration of Waivers

As part of its application for site plan approval, the applicant requires design waivers related to buffering, signage and the trash enclosure. In consideration of the required design waivers, the New Jersey Municipal Land Use Law, N.J.S.A 40:55D-51b permits the Land Use Board to “...grant such exceptions from the requirements for site plan approval as may be reasonable and within the general purpose and intent of the provisions for site plan review and approval of an ordinance adopted pursuant to this article, if the literal enforcement of one or more provisions of the ordinance is impracticable or will exact undue hardship because of peculiar conditions pertaining to the land in question.” The Court, in Garofalo v. Burlington Tp., 212 N.J. Super. 458 (Law Div. 1985) noted a waiver is simply an acknowledgement the proposal is satisfactory relative to the site plan requirements. Waivers must be considered reasonable under the facts. The applicant should provide appropriate testimony to support the design waivers.

We trust the Board will find this information useful in consideration of the matter at hand. We will attend the hearing on September 29th and reserve the right to provide additional comment based on the applicant’s presentation. Should you wish to discuss this review memo, please feel free to contact me via e-mail (jkyle@kylemcmmanus.com) or phone at 609-529-8692.

Sincerely,



James T. Kyle, PP/AICP, Board Planner

attachment

Cc: Brenda Kraemer, PE (via e-mail)
Ed Schmierer, Esq., Board Attorney (via e-mail)



SURINDER S. ARORA, PE
President

ARORA and ASSOCIATES, P.C.

Consulting Engineers

Princeton Pike Corporate Center
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(609) 844-1111 • Fax (609) 844-9799

MEMORANDUM

DATE: September 15, 2021

TO: Lawrence Township Planning Board and Zoning Board of Adjustment

FROM: Jeffrey A. L'Amoreaux, P.E. *JAL*
Traffic Consultant

SUBJECT: Use and Bulk Variance Application No. ZB-2/21
Major Site Plan - Preliminary & Final Approval Application No. SP-1/21
Dr. Radwa Saad, DMD (Premier Dental Arts), 3640 Lawrence Road
Tax Map Page 67.02, Block 6701, Lot 1
Zoning Board Memorandum #1
Lawrence Township, Mercer County, New Jersey

We are in receipt of the following information for review pertaining to the submission of a Bulk and Use Variance Application and a Preliminary and Final Site Plan Approval for a proposed dental practice to be located along U.S. Route 206 (Lawrence Road):

- One Transmittal Letter from Susan J. Snook, Administrative Secretary dated August 23, 2021, for reports due no later than Wednesday September 15, 2021.
- One bound Township of Lawrence, Mercer County, NJ, Department of Community Development, Land Use Application Master Checklist filled out, including Forms G-1, C-1 & U-1 and Supplement to Application, with signatures dated April 16, 2021.
- One bound Well Inspection Report, prepared by Blue Heron Water Treatment and Well Pumping Systems Solutions, dated August 3, 2021.
- One bound Bacteriological and Chemical Testing Report, prepared by Garden State Laboratories, Inc., dated August 6, 2021.
- One unbound On-Site System Inspection Report, prepared by Cella's Septic Company, dated July 18, 2021.
- One bound set of Preliminary and Final Site Plans for Smiles Real Estate, LLC (5 sheets), prepared by MEH Consulting Engineers, Inc. last revised July 19, 2021.
- One bound set of Architectural Plans for Premier Dental Arts (6 sheets) prepared by The Lion & Crown Architecture & Design last revised July 30, 2021.

From the existing and proposed building plans and supporting documentation, the following are apparent. The proposed dental office is located on a property designated as Block 6701, Lot 1 on the Township of Lawrence Tax Map. It is in the south(west) quadrant of the intersection of US Route 206 (Lawrence Road, or Trenton-Princeton Road) and Province Line Road at Milepost 51.29 along the northbound side. Existing access to the subject property is provided via one (1) full-movement gated driveway along U.S. Route 206 and one (1) full-movement gated driveway along Province Line Road. The U.S. Route 206 driveway is typically open and the Province Line Road driveway is usually shut.

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The existing property is occupied by a Single-Family Detached Dwelling per §401.B.3 with “Accessory Use” being Home Occupation (existing Medical Practice office) per §401.C.9. The plans show that the ground floor of the existing building was the home with the medical practice/office in the basement (634 SF of Office and Home Business combined space, with the remainder of the 1,178 total square foot basement being separate laundry/storage and mechanical/furnace rooms). The new use is a seven-chair dental practice. The earlier Planning Board submission showed it as a ten-chair dental practice. The existing or former occupant is or was a chiropractic office.

We offer the following comments.

Preliminary and Final Major Site Plans

1. The Sign Details on Sheet Y-3 of 5 require corrections. The Van Accessible Plaque is R7-8P per the MUTCD, it is not shown. Specifications call for it to be 18” wide by 9” tall per MUTCD standard. The New Jersey penalty plate is R(NJ)7-8A, not R7-8P. It should be shown to be 10” wide by 12” tall. The R7-8 Reserved Parking Sign should be shown to be 12” wide by 18” tall. Please show them proportionately to scale with each other. The two shown appear to be correctly proportioned. The Van Accessible Plaque goes between them. **Comment Open, sign R7-8P still incorrectly shown as New Jersey Penalty Plate rather than Van Accessible Plaque which is still not shown.**
2. We do not understand the justification for prohibiting left turns exiting the existing full-access driveway onto U.S. Route 206. **Comment Open, left turn prohibition still shown.**
3. Will the gate to the Province Line Road access be opened at some point? The applicant is requested to clarify. **Comment Partially Satisfied, a single unit truck is shown turning left to enter there off Province Line Road.**
4. What are the “Metal Container” and concrete pad “Out Building” adjacent to the Province Line Road gated driveway, and will they remain? The applicant is requested to clarify. **Comment Satisfied, they are now labeled “To Be Removed”.**

Parking and Trip Generation Analysis

5. Stonefield prepared a “Request for Letter of No Interest” from NJDOT in which they presented a 3,000 SF “existing medical practice” (the true existing “office and home business” space being a 634 SF total for single-patient chiropractic exam room and office) compared to the proposed 3,000 SF 7-chair proposed dental practice and therefore had a finding of “no change” in existing versus proposed trip generation evaluation. We note that the expected change will be less than the 100 VPH increase that would concern NJDOT. **Comment Open. Applicant has reduced the number of examination rooms from ten to seven, but that still far exceeds what’s allowed in the Environmental Protection (EP-1) Zone as noted below.**

Use & Bulk Variance Application No. ZB-2/21
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The EP-1 Zoning Code

6. The Home Occupation in the EP-1 Zoning Code limited the usable space for that purpose to 450 SF of floor area in §429.I.2 and limited the staff to “no more than one non-resident” in §429.I.1. There was a further limitation to “Not more than five parking spaces per property, including required residential parking” in §429.I.8 and “No more than two clients, customers, patients or patrons shall be permitted at any given time on the premises for business or commercial purposes per §429.I.9. These aspects of the existing conditions may change with the new proposed use. Clarification is requested from the applicant. **Comment Open. Plans currently indicate seven (7) dental chairs for patients and seventeen (17) parking spaces. It also does not appear that the dentist will be living on the premises, anticipated staff size unknown.**

This completes our comments at this time. Additional comments may be provided as this project moves forward.

Cc: James Parvesse, P.E.
Brenda Kraemer, P.E.
Susan Snook

TOWNSHIP OF LAWRENCE
Department of Community Development

TO: Brenda Kraemer, Assistant Municipal Engineer
James Kyle, Planning Consultant
Jeffrey L'Amoreaux, Traffic Consultant
Michael Rodgers, Construction Official
Public Safety Coordinating Committee – ATTN: Edward Tencza
Environmental Resources Committee
Shade Tree Advisory Committee
Keith Levine, Health Officer
Greg Whitehead, Director of Public Works

FROM: Susan Snook, Administrative Secretary *SS*

SUBJECT: Use and Bulk Variance Application No. ZB-2/21
Major Site Plan – Preliminary & Final Approval Application No. SP-1/21
Dr. Radwa Saad, DMD (Premier Dental Arts), 3640 Lawrence Road
Tax Map Page 67.02, Block 6701, Lot 1

DATE: August 23, 2021

Attached are the following documents with regard to the above-referenced use variance and site plan application for the proposed home professional dental office.

- Application Nos. ZB-2/21 and SP-1/21 with Supplement to Application
- Blue Heron Water Treatment & Well Service, dated August 3, 2021
- Garden State Laboratories Report, dated August 6, 2021
- On-site System Inspection Form, undated
- Cella's Septic Company Report, dated July 20, 2021
- Title Sheet, Sheet Y-1, revision dated July 19, 2021
- Existing Condition Plan, Sheet Y-2, revision dated July 19, 2021
- Dimension Plan, Sheet Y-3, revision dated July 19, 2021
- Grading Plan, Sheet Y-4, revision dated July 19, 2021
- Landscaping Plan, Sheet Y-5, revision dated July 19, 2021
- Cover Sheet, Sheet CS, revision dated July 30, 2021
- Existing Conditions, Sheet EX1.1, dated April 4, 2021
- Existing Elevations, Sheet EX2.1 and EX2.2, dated April 4, 2021
- Proposed Plan, Sheet A1.1, revision dated July 30, 2021
- Proposed Elevations, Sheet A2.1, dated April 4, 2021

This application is scheduled for review by the Zoning Board at a Special meeting scheduled for Wednesday, September 29, 2021.

Please review these documents and submit your report to this office as soon as possible, but **no later than Wednesday, September 15, 2021** so that reports may be provided to the applicant and Board members prior to the meeting.

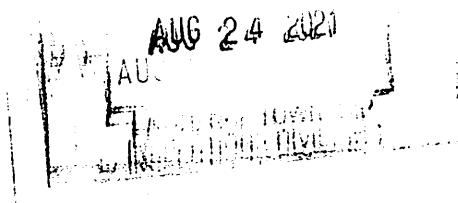
SJS

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Attachments

cc: Edwin Schmierer, Zoning Board Attorney

08/24/2021 No Fire Comments SM
8/25/21 NO PLDG COMMENTS JO
8/25/21 NO ELECTRIC COMMENTS JM
8/26/21 No Bldg Comments MR



LAWRENCE TOWNSHIP HEALTH DEPARTMENT
2207 Lawrenceville Road - Box 6006 - Lawrenceville, New Jersey 08648
Telephone: (609) 844-7089

Date: August 31, 2021
To: Brenda Kraemer, Assistant Municipal Engineer
From: Keith Levine, Health Officer

REVIEW FOR:

<input type="checkbox"/>	Building Permit	<input type="checkbox"/>	Food Establishment
<input type="checkbox"/>	Certificate of Occupancy	<input type="checkbox"/>	Sewage Disposal System
<input type="checkbox"/>	Planning Board	<input type="checkbox"/>	Individual Water Supply
<input checked="" type="checkbox"/>	Zoning Board	<input type="checkbox"/>	Commercial Property
<input type="checkbox"/>	Other: _____	<input type="checkbox"/>	Other: _____

PROJECT NAME: Use and Bulk Variance Application No. ZB-2/21

LOCATION: 3640 Lawrenceville Road Lawrenceville, NJ 08648

BLOCK: 6701 LOT # 1 PR# _____

OWNER: David & Leona Maffei Phone: 609-638-8158

ENGINEER/ARCHITECT: Mohammed El-Hawwatt, PE

ADDRESS: MEH Consulting Engineers, INC. mohammed@mehengineers.com
825 bloomfield Ave., Verona, NJ 07044 PHONE: 973-239-2626

APPROVAL DISAPPROVAL APPROVAL WITH CONDITIONS

COMMENTS:



For revised plans and reports submission dated August 23, 2021:
Please see the attached Health Department memo dated August 31, 2021.

Contact the health department at (609) 844-7089 if there are any questions.


Health Officer

MEMORANDUM
Lawrence Township Health Department

TO: Zoning

FROM: Keith Levine, Health Officer 
 John R. Sullivan, REHS 

DATE: August 31, 2021

RE: Health Department Comments regarding
 Proposed Use and Bulk Variance Application # SP-1/21 for
 3640 Lawrenceville Road, Block 6701, Lot 1
 Revised Submission dated August 23, 2021, received August 25, 2021

May 2021 Submission comments: UNCHANGED

Per the application, the buyer intends to convert the existing dwelling/chiropractic office to a dental office. No details were provided on the plans depicting the site's water source or septic system (location and components).

The existing conditions plan indicates the structure contains 3 bedrooms on the first floor with office space, water tanks, a sump and a toilet in the basement. The Applicant's plans indicate a proposed renovation area of 2,942 Sq. Ft. with a total of 4,453 Sq. Ft. under roof including the basement.

The MEH Consulting Engineers, Inc. report provided with the application proposed the following estimates of daily sanitary flow (Q) for the dentist office as follows:

8 staff + 18 patients per day = 26 staff and patients
 At 15 gallons per day (GPD) per person
 Yielding a daily follow (Q) of 390 GPD
 And / Or 0.125 GPD/Sq. Ft. of building area X 3,000 Sq. Ft. = 375 GPD

The septic regulations require that the higher of the two values be utilized to determine Q. Based upon this, the proposed Q = 390 GPD. The report then indicates that there is a 1,000-gallon structure on site that is sufficient to handle this volume. No other information is provided.

These estimates are generally in accordance with the requirements of NJAC 7:9A-7.4, the Standards for Individual Subsurface Sewage Disposal Systems, used to calculate the daily volume of sanitary waste (Q) generated for commercial properties.

In order to evaluate/verify the total anticipated daily flow (Q) the Applicant should confirm the maximum number of patients per day is 18. This patient count seems low.

The total building area (4,453 Sq. Ft.) should be utilized to calculate Q. Thus, $0.125 \text{ GPD/Sq. Ft.} \times 4,453 \text{ Sq. Ft.} = 557 \text{ GPD}$.

Once staff and patient counts are confirmed, Q can be recalculated and the higher of the values obtained (people vs. area) be utilized to determine the anticipated daily flow (Q) that the septic system will be required to accommodate.

The location and condition of the existing septic system must be investigated and evaluated in accordance with the NJDEP *Technical Guidance for Inspections of Onsite Wastewater Treatment and Disposal Systems* to determine if it is functioning properly with results reported to the Health Department for review. Details and location of the site's water source shall be provided and added to the plans (private well vs public water).

Septic and well component locations shall be provided on the plans.

August 23, 2021 Submission Review:

As requested, this submission provides results of investigations into the condition of the site's existing septic system and potable well. Septic system components and potable well locations are now shown on the plans.

Water Source:

The site is served by a private potable well.

The potable well system was evaluated by Blue Heron Water Treatment & Well Services in a report dated 8/3/2021. The report indicates the well water system to be in POOR condition and recommends the water system (pump, piping, wiring & storage tank) be replaced, and the wellhead extended above grade.

A potable well water analysis report for samples collected on 7/30/2021 was provided. Testing was performed for a limited analytical suite of parameters. No exceedances were noted but the analytical parameters were not completely in accordance with the NJ Private Well Testing Act requirements.

Septic System:

A septic system inspection was conducted by Cella's Septic Company and a report dated 7/20/2021 was provided.

The report contains several inconsistencies but the overall conclusion was that the system is in UNSATISFACTORY condition and needs to be replaced.

Per the report: A garbage disposal unit is present. The block septic tank was not pumped for the inspection. Effluent flow from the septic tank is impeded. It appears that the washing machine may be connected to a separate graywater system. The absorption area

is described as having a block “cesspool” and a D-box with stone, and that the stone contains “excess effluent”.

Findings/ Recommendations:

Water Source:

Repair the water system as recommended in the provided report.

Since the water source is a private well, the proposed use would likely require the water system to be re-classified as a Transient Non-Community Water System and would have to meet the requirements thereof.

Septic System:

The septic system is not functioning properly and shall be replaced. This will require the performance of witnessed soil testing, followed by preparation and submission, to the Health Department for review, of a septic design prepared in accordance with the requirements of NJAC 7:9A. As part of the design process the daily flow (Q) shall be clarified as requested in our original comments.

Based upon the above, the Health Department must recommend DISAPPROVAL of the pending application at this time.



LAWRENCE TOWNSHIP

ENVIRONMENTAL & GREEN ADVISORY COMMITTEE

Lawrence Twp., NJ
CLEAN AIR, LAND, AND WATER

To: Lawrence Township Zoning Board Members
From: Lawrence Township Environmental and Green Advisory Committee
Date: September 15, 2021
Re: **Premier Dental Arts**
Bulk and Use Variance App No. ZB-2/21, Prelim/Final Major Site Plan SP-1/21
3640 Trenton Princeton Rd., Tax Map Page 67.02, Block 6701, Lots 1

In accordance with the legal authority and responsibility of the Lawrence Township Environmental and Green Advisory Committee (EGAC), we have conducted a review of the application materials provided to the Committee by the Township of Lawrence.

SUMMARY

This project is a corner lot, 3.261 acres and within the EP-1 (Environmental Protection-1) Zoning District. The application seeks to convert a home medical office to a professional office, pursuant to section 416-Professional Office (PO). 7 new parking spaces, handicap accessibility, a new dumpster, and conversion of in-ground pool to koi pond are proposed. New information includes the water and sewer studies and a several revisions to plans including a modified landscaping plan.

Further information for the sewer and water systems is needed to assess suitability and understand impact. We recommend resolution of issues and required approvals prior to any variances or waivers rather than conditional approval. Regardless, while the information is useful and current proposed revisions (and others we list below) improve environmental issues somewhat, we conclude these changes and the project do not justify the impact a D variance will have on the environmental landscape and public good and, furthermore, the project appears inconsistent with the Land Use Element of the Master Plan.

Recommendation:

1. No Use Variance.

Other Recommendations for Issues (*resolution of issues does not imply satisfaction of D variance criteria*):

2. Lighting detail still missing, provide details.
3. Clarify impervious surface limits.
4. Provide design details of new septic system and show on plans.
5. Provide design details of new water system and show on plans.
6. Confirm regulatory distance of drinking well from septic well and leach field.
7. Add Historical Hedge Row and landscaping along parking lot to block parked car lights and add ecological and aesthetic value.
8. Add Bike Parking.
9. Add EV Charging Station.

DETAILED REVIEW

EP-1 DESIGNATION, MASTER PLAN, HISTORIC DISTRICT DESIGNATION

1. A Use Variance appears to undermine the Purpose and Intent of the EP-1 Zone and the Land Use Element of the Plan (*Purpose and Intent*), specifically:
 - J. To promote the conservation of *historic sites and districts*, open space, energy resources and valuable natural resources and to prevent *urban sprawl* and *degradation of the environment through improper use of land*.
 - Q. *To Discourage small scale office development outside of designated neighborhood commercial areas.*
 - X. *To preserve and embrace historic buildings, places, and landscapes*, encourage the maintenance of traditional architectural forms in buildings, and retain *rural road characteristics*, including but not limited to the following areas:
...
 5. Sites designated on *State and National Registers of Historic Places*.
 6. *Adjacent or nearby sites that by their proximity to listed places influence the nature of historic places.*
2. Zoning is a stated vehicle for protecting the registered historical district and the characteristic of the landscape and the “genius loci”¹. The Kings Highway District is listed with **both** the State and National Registers of Historic Places. The reference and guidance material is *The Secretary of the Interior’s Standards for the Treatment of Historic Properties and the Guidelines for the Treatment of Cultural Landscapes*. The section *Spatial Organization and Land Patterns: Standards for Preservation* includes the standard:

Protecting spatial organization and land patterns that extend beyond a landscape. Utilizing preservation tools such as acquisition, zoning, scenic and conservation easements.
3. Protecting the characteristic of the landscape and the State and Federal Historical Designation, especially combined with the rich history of the area (in particular the significance of the 10 Crucial Days of The Revolutionary War), benefits public good, attracting recognition and tourism, providing educational opportunities, and providing a sense of place in history for residents. In addition to being the King’s Highway Historic District, this corridor is also the Assunpink Trail, the Washington-Rochambeau Revolutionary Route National Historic Trail, Washington’s Victory Trail, and the original Lincoln Highway.
4. *Precedent* may continue to have a negative impact on the Zone Designation and Land Use Element Master Plan, as well as the Historic Designations.

SEPTIC SYSTEM, DRINKING WELL, POTABLE WATER TESTS

1. Per the Septic Report, the system is failing and needs to be replaced. To properly assess design suitability and impact, soil tests should be completed, and a design should be shown on plans and include detail. Among other things, there is dangerous pathogen

¹ “Genius Loci” is a principle of landscape design and refers to a location’s distinctive atmosphere.
EGAC Memo. Premier Dental v2. September 15, 2021. Page 2

concern with the leach field failure, proper sizing for proposed use is necessary, and trees and shrubs may be impacted. A Maintenance Plan, including reference to location of trees and avoidance of soil compaction among other things, is recommending to prevent future failure.

2. The septic well and leach field need to be the regulated distance from the drinking well. Need specific location detail.
3. Per the Water Treatment and Pumping Report, the potable water system is rated poor and requires a complete overhaul. Details should be included on the plans. Potable water seems a particular consideration for a dental office.

STORMWATER MANAGEMENT

1. The applicant's plan (prior and revised) indicate maximum impervious cover is capped at 12% (existing conditions is +/- 11.28% and proposed is +/-11.56%). The Board Planner report indicates maximum impervious cover is 10%. The township LUO indicates 8% in EP-1 Zone for "Other Permitted Uses" (beside Residential or Ag). More than 90% of all NJ water bodies are impaired, and less than 1% of our waters in NJ meet the Clean Water Act standards for fish consumption and only 24% for recreation (such as swimming) standards. Impervious cover above 10% results in impairment, and as the surrounding area is between 15-20% impervious cover, there is an impact on water quality as well as quantity. We seek clarification and hope for adherence to the regulations at a bare minimum.
2. Buffer has been added to the rear of the property. However, given the slope of the property, the addition of Green Infrastructure to mitigate and protect the neighbors to the rear of the property and Province Line Road is recommended. A "rain garden", no-mow vegetation and additional trees are options.

TRANSPORTATION

1. Applicant can take advantage of the PSE&G financial incentives to support EV charging equipment installations. [Home - Drive Green - Air Quality, Energy and Sustainability \(AOES\) | Department of Environmental Protection \(nj.gov\)](https://www.nj.gov/transportation/air-quality/energy-and-sustainability/aoes/)
2. We suggest bike parking (per Circulation Plan 2019 recommendation).

LANDSCAPING AND EXTERIOR SPACE

As the fence has been removed, we recommend a native multispecies hedgerow along the rest of the perimeter, avoiding sight triangle, that is in alignment with the landscape of the historically significant time period which can also act as a fence and a buffer from headlights while providing ecological services.

At a minimum, we recommend additional native plantings along the bare parking lot perimeter to buffer car headlights pointing towards Lawrence Road while providing ecological services and aesthetic appeal.

LIGHTING

There is no detail regarding lighting. Lighting is impactful especially to insect and bird health, as well as human health. Per the *International Dark Sky Association*, lighting should: 1.) Only be on when needed. 2.) Only light the area that needs it. 3.) Be no brighter than necessary. 4.) Be fully shielded. 5.) Minimize blue light emissions. Use "warm-white" or filtered LEDs (CCT \leq 3000 K; S/P ratio \leq 1.2).