

Applicant

RPM Development

Appl. No.

2B-3/19

REFERRALS

	Date Referred	Comments Dated	Date Referred	Comments Dated	Additional Reports
a. Municipal Engineer	7/20/20	8.31.20	11/23/20	12/3/20	
b. Professional Planner		9.1.20	11/23/20	12/8/20	
c. Traffic Consultant		9.2.20	11/23/20	12/7/20	
d. Construction Official		7/30/20	11/23/20	11/23/20	
e. Shade Tree Advisory Comm.		8.24.20	11/23/20		
f. Health Officer			11/23/20	12/5/20	
g. Tax Collector	1/23/20				
h. Public Safety	7/30/20		11/23/20	12/9/20	
i. Environ. Res. Committee	7/30/20	8/31/20	11/23/20		
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					
p. PSE&G Co.					
q. Board of Education					
r. Historic Preserv. Comm.					
s. NJDEPE/Wetlands					
t. NJDEPE/Stream Encroachment					
u. <u>Greg Whitehead</u>	7/30/20		11/23/20		
v. _____					
w. _____					
x. _____					
y. _____					
z. _____					

**TOWNSHIP OF LAWRENCE**  
**Engineering Department**

TO: File

FROM:  Brenda Kraemer, Assistant Municipal Engineer

SUBJECT: Bulk and Use Variance Application No. ZB-3/19  
Major Site Plan – Preliminary & Final Approval Application No. SP-5/20  
Major Subdivision – Preliminary and Final Approval Application No. S-2/20  
**RPM Development**, 2495 Brunswick Pike  
Tax Map Page 20.01, Block 2001, Lots 2, 3, 5, 60 – 66 and 68

DATE: December 3, 2020

**General:**

RPM Development Group has requested Preliminary and Final Site Plan approval for construction of six (6) two-story duplexes and three (3) three-story apartment buildings on the northern side of the Lawrence Shopping Center. This section of property, approximately 4.3 acres, will be subdivided from the main Lawrence Shopping Center property. A Use Variance is required for residential housing as the site is located in the HC Zone.

During the first Zoning Board meeting on September 16, 2020, and subsequent technical meetings with the applicant's team, concerns were raised regarding adequate and accessible on-site parking. Although parking had originally been proposed on the Lawrence Shopping Center property, there was no direct route. Parking was not an integrated part of a cohesive residential project.

The plans have been revised to provide a physical connection to a rear parking area behind Buildings A and B that will be carved out of the Lawrence Shopping Center loading area. The new parking area will be separated from Lawrence Shopping Center with a landscaped median. The subdivision line has been shifted to encompass this area.

Other site revisions include:

- The entrance and exit have been combined into one driveway on the eastern side of the duplexes.
- A dog park area and playground have been provided.

We note that the recent revisions do not address the stormwater management issues originally noted in our August 31, 2020 report. Additional comments have also been generated based on the plan modifications. As stormwater management may impact site design / layout, we recommend these items be addressed prior to formal Board action.

**1.00 Detailed Report:**

**1.00 Site Layout**

- 1.01** The plans have been revised to provide 102 on-site parking spaces. A variance is required for the number of parking spaces (141 required based on number of units / bedrooms, 102 provided). The applicant must demonstrate to the Board's satisfaction that an overall ratio of 1.46 spaces per unit is reasonable for this development. Comparisons to other suburban projects shall be provided. Developments in urban settings are not comparable to this project.

There is no area available for overflow parking. Texas Avenue is designated "no parking" along the site frontage. The number of spaces must be determined to be sufficient for residents and visitors. The applicant shall clarify if there are any plans to assign spaces.

- 1.02 A dog park and a playground area have been provided as recreational amenities. Both of these site features are located in the flood storage area, which raises questions about durability of the proposed surfaces. As discussed under Section 2.00, we continue to request additional information about the flood storage volume and elevations.

The Board may also wish to consider the following:

- a. The dog park is surrounded with a chain link fence. A decorative fence or perimeter landscaping is recommended.
  - b. The route to the amenities is circuitous due to the grade differential. Alternate access points should be explored.
  - c. There is no lighting provided along the sidewalks to these site features. At a minimum, the dog park may be expected to be used at dusk/night.
- 1.03 The Public Safety Committee and the Fire Marshal will review emergency vehicle access. Fire lanes shall be provided for all areas not designated for parking.
- 1.04 Testimony shall be provided to demonstrate that the trash and recycling area will accommodate 70 residential units with an estimated 191 residents. Note that the duplex units will also need to utilize the area. The Township will not provide this service.
- 1.05 It is unclear whether an elevator will be provided in the multi-story buildings. The architect shall address this issue in testimony. The architect shall also clarify whether laundry appliances are provided in the duplex units. It is unclear if the mechanical rooms are intended for laundry use.
- 1.06 Road restoration will consist of full width milling and overlay on Texas Avenue. The sawcut limits shown on the plan are acceptable. Note that all trench repair within the right-of-way shall include a six-inch (6") stabilized base course due to the classification of Texas Avenue.
- 1.07 It does not appear that access to Buildings A and B is provided at the rear of the buildings, adjacent to the new parking area. A sidewalk shall be provided along the westerly side of Building B to decrease the length of walking route. The retaining wall shall be shifted at this corner of the building.
- 1.08 A revised subdivision plan shall be provided. All easements shall be incorporated. Note that an emergency cross access easement and general site construction access easement will also be required between this project and Lawrence Shopping Center.

Monuments are required at all lot corners on both lots except with the stream.

- 1.09 The property owner shall provide testimony regarding the Phase 1 Environmental Assessment, current environmental status and any implication for future construction.

## 2.00 Stormwater Management

- 2.01 Further documentation is required to support the absence of a groundwater recharge design. According to the New Jersey Department of Environmental Protection, if a site is within an urban redevelopment area and has been previously developed, groundwater recharge requirements do not apply. The applicant must demonstrate the area has been previously developed, as "cleared of vegetation" is not considered previously developed if woody vegetation has been re-established. Only portions of the site that have been previously developed are exempt from the groundwater recharge requirements.

- 2.02 Soil testing must be witnessed by this office per §522.E.4. of the Lawrence Township Land Use Ordinance if any infiltration structures will be provided to address the above issue.
- 2.03 The roof drainage designs for the duplexes and the multi-family buildings shall be added to the plans. All roof piping shall be connected to the underground storm sewer system. The design details (inverts, clean-out locations, all pipe locations, etc.) are required on the final plans.
- 2.04 Further information shall be provided for the 30" RCP that will be re-routed and connected to the outlet point. The flow from this pipe shall be included in the outlet protection design. It is unclear whether the design Q includes the basin 25 year outflow and the 30" RCP 25 year flow. The depth of flow within the channel shall also be provided for all storms, considering both flow components.
- 2.05 The flood storage area shall be further explained. The height of water in the area during the 100-year event, backwater impacts, etc. shall be provided. Information shall also be provided for low intensity storms. It is unclear how the recreational amenities are impacted and whether the surfaces can withstand water inundation on a regular basis. It appears that the trench drain system will be the limiting outlet control. Analysis is required.
- 2.06 The existing drainage area (labeled south on the DA map) behind Buildings A and B does not appear to drain to the existing ditch on the western side of the project. If it is a different drainage outcome/location, the predevelopment flows cannot be combined. The applicant's engineer shall review this issue.

In the proposed condition, it appears that impervious runoff from the parking area drains directly onto Lawrence Shopping Center property, which is not permitted without mitigation. Also see Comment 3.03 regarding the grading of this area.

### 3.00 Grading

- 3.01 Grading in lawn areas shall not exceed a maximum slope of 5:1 on residential properties per §522.D.1.d. of the Lawrence Township Land Use Ordinance. If this slope cannot be achieved, sod shall be specified.
- 3.02 Grading plans are required for all sidewalk extensions, including linkages to Lawrence Shopping Center.
- 3.03 The new parking area behind Buildings A and B does not comply with grading requirements. The curblane area is completely flat. The ordinance requires a minimum of 0.75% along the curblane and 1.5% overland. We recommend consideration of depressed curbs with green infrastructure features in the median. Grading will still have to be revised to meet minimum standards.

### 4.00 Site Improvements

- 4.01 The overhead utility wires in the landscaping median behind Buildings A and B will impact the viability of the plant material. The utilities serve Lawrence Shopping Center and shall be relocated to the Lawrence Shopping Center property. Underground installation is preferred.
- 4.02 Public Service Electric & Gas approval will be required for installation of the parking lot within the gas easement.

4.03 The following revisions to the construction details are required:

- a. The crosswalks shall be ladder type, high visibility.
- b. ADA ramps with mats shall be provided at all walkway intersections with driving aisles, including on the Lawrence Shopping Center.
- c. A subbase of four-inch (4") dense graded aggregate is required under all drainage structures, curb and sidewalk.
- d. Type "N" Eco heads shall be specified for the Type "B" inlets.
- e. A decorative fence shall be provided on top of the retaining wall if the grade differential exceeds 30". Shop drawings will be required prior to construction.

5.00 **Miscellaneous**

5.01 Bonding and inspection fees will be required.

5.02 Other permits/approvals:

- a. New Jersey Department of Environmental Protection
- b. Delaware & Raritan Canal Commission
- c. Mercer County Planning Board
- d. Ewing-Lawrence Sewerage Authority
- e. Trenton Water Works
- f. Lawrence Township Soil Disturbance

BK/sjs

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**Documents Reviewed:**

- Letter from Dynamic Engineering, dated November 20, 2020
- Stormwater Management, Groundwater Recharge and Water Quality Analysis, revision dated November 2020
- Cover Sheet, Sheet 1 of 23, revision dated November 16, 2020
- Aerial Map, Sheet 2 of 23, revision dated November 16, 2020
- General Notes, Sheet 3 of 23, revision dated November 16, 2020
- Overall Site Plan, Sheet 4 of 23, revision dated November 16, 2020
- Demolition Plan, Sheet 5 of 23, revision dated November 16, 2020
- Site Plan, Sheet 6 of 23, revision dated November 16, 2020
- Grading Plan, Sheet 7 of 23, revision dated November 16, 2020
- Drainage & Utility Plan, Sheet 8 of 23, revision dated November 16, 2020
- Utility Profiles, Sheet 9 of 23 and 10 of 23, revision dated November 16, 2020
- Landscape Plan, Sheet 11 of 23, revision dated November 16, 2020
- Lighting Plan, Sheet 12 of 23, revision dated November 16, 2020
- Construction Details, Sheets 13 of 23 thru 18 of 23, revision dated November 16, 2020
- Vehicle Circulation Plan (SU-30), Sheet 19 of 23, revision dated November 16, 2020
- Vehicle Circulation Plan (Fire Truck), Sheet 20 of 23, revision dated November 16, 2020
- Vehicle Circulation Plan A (WB-67), Sheet 21 of 23, revision dated November 16, 2020
- Vehicle Circulation Plan B (WB-67), Sheet 22 of 23, revision dated November 16, 2020
- Vehicle Circulation Plan C (WB-67), Sheet 23 of 23, revision dated November 16, 2020



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**To:** Lawrence Township Zoning Board of Adjustment

**From:** Kendra Lelie, PP, AICP, LLA

**Re:** RPM Development, LLC - Case No. ZB-3/19, SP-5/20, S-2/20  
Use Variance d(1) - Use, d(4) – Floor Area Ratio, d(6) - Height  
Preliminary & Final Site Plan  
Preliminary & Final Major Subdivision  
2495 Brunswick Pike  
Block 2001, Lots 3, 60 through 66, 68  
Highway Commercial (HC) & R-4 Residential District

**Date:** September 1, 2020  
**Updated: December 8, 2020 (Bold Underlined Type)**

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## 1.0 Project and Site Description

The applicant proposes to subdivide Block 2001, Parts of Lots 3, 60 and 61 from the Lawrence Shopping Center to create a new lot consisting of 3.916 acres (**Proposed Lot 2.02**) in a roughly triangular shaped parcel. The proposed lot will be located mostly in the Highway Commercial (HC) district with a small segment of the southwest corner of the lot in the R-4 Residential district. The shopping center tract will be reduced to **47.8** acres (**Proposed Lot 2.01**).

The applicant proposes an 100% affordable housing development consisting of 69 affordable family rental housing units deed restricted for low- and moderate-income families and one unit for the site supervisor within nine buildings as described below:

- 12 Duplex Dwellings (six buildings total). These houses would line Texas Avenue between Glenn and Foch Avenues (paper street). Each building would range between 2,200 and 2,500 square feet with each floor containing a dwelling unit.
- One Multi-Family Building with 24 Apartments (Building A). This building is located near the rear lot line that is coterminous with the shopping center. It is a three-story building.
- One Multi-Family building with 22 Apartments (Building B). This building is also located along the rear lot line but further west from the 24-unit apartment building. A small segment of the



northwest corner of the building is bisected by the zoning boundary and sits in the R-4 zoning district. This building is also three stories and contains a community room on the first floor.

- One Multi-Family Building with 12 Apartments (Building C). This would be located on the western side of the lot in between the duplexes and Building B.

Access to the residential development is proposed via two (2) one-way drive aisles intersecting Texas Avenue.

**The applicant provided an updated site plan including the following major revisions:**

- **The subdivision line between proposed lots 2.01 and 2.02 has been relocated to accommodate the revised parking and circulation layout on proposed lot 2.02 (residential development parcel);**
- **A new parking layout was provided with 102 off-street parking spaces on proposed lot 2.02;**
- **The ingress and egress are now proposed from one (1) two-way drive aisles located between the duplex structures and the flood storage/recreation area;**
- **The removal of the proposed on-street parking spaces;**
- **The addition of site improvements on the proposed lot 2.01 including addition planting islands, pedestrian crosswalk, signage and sidewalks; and**
- **The addition of a playground and dog park recreation area within the flood management storage area.**

The parcel includes a 20-foot wide gas pipeline easement adjacent to the new line separating this parcel from the shopping center tract. In addition, on the far eastern portion of the site is a 20-foot wide sanitary sewer easement.

The site slopes from a high point along Texas Avenue on the western end of the site to the south and east with an elevation approximately 13 feet lower than the high point. This topographic relief aids in reducing the visual effect of the three-story multi-family buildings proposed. Freshwater wetlands and the associated 50-foot wide transition buffer are located in the southwest corner and along the western property boundary.

A stormwater ditch runs through the middle of the property where it exits via a 30-inch stormwater pipe that drains part of Texas Avenue. The stormwater pipe will be extended through the western two-thirds of the site where it will exit the ground at an outfall into a proposed basin. The basin will serve as flood

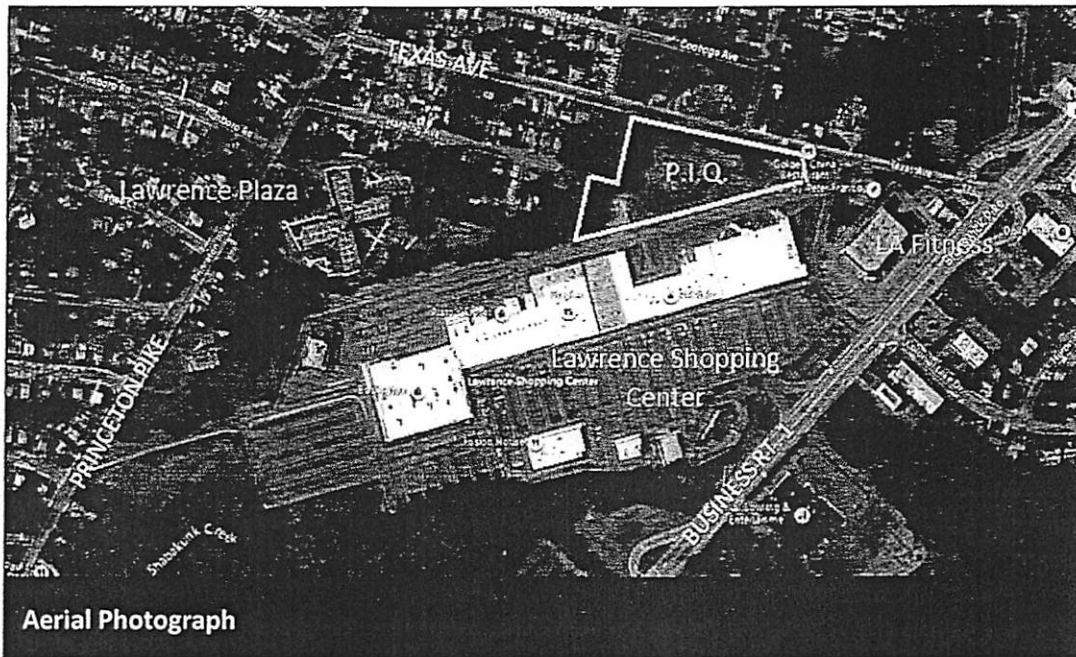


storage capacity for the stormwater emanating from Texas Avenue and will occupy the eastern one-third of the site. The stormwater management system volume control for the site will be placed underground within the center of the site.

Along the frontage of Texas Avenue there is a mixture of large Oak and Pine trees which are proposed to be removed to accommodate the affordable housing development.

## 2.0 Surrounding Area

The site directly abuts the loading area of the Lawrence Shopping Center, which lies to the south. A single-family detached neighborhood of Cape Cod and bungalow style dwellings that are one to one-and-a-half stories in height is located to the north of the subject parcel. Wooded vacant property is situated to the west of the subject parcel and farther west along Texas Avenue is similar single-family detached houses as those located to the north, some of which are two-stories in height. Also, further to the west is a 100% affordable senior apartment building, known as Lawrence Plaza, with 161 units. Non-residential uses are situated to the east of the subject parcel.







### 3.0 Master Plan, Zoning and Compliance

- 3.1 Master Plan. This site was recently added as a 100% affordable housing site to the Township's Housing Element and Fair Share Plan adopted by the Planning Board on July 20, 2020 following a public hearing. The July 2020 Housing Element and Fair Share Plan states the following regarding the proposed affordable housing development:

*Typically, municipalities are required to adopt an ordinance to implement any necessary zoning changes to permit the development of the proposed inclusionary housing site on the shopping center property. Because of the tight timing of the application process between this revision to the housing plan and the Low Income Housing Tax Credit deadline in mid-September 2020, an application for development may be made to the Zoning Board of Adjustment for use variance and preliminary site plan approval. As a 100% affordable housing development, it is considered an inherently beneficial use which means it meets the most difficult prong of the use variance test. Should the timeline not be met, the Township will create a zoning district that allows the use by-right as a condition of any Judgment of Repose.*

### 3.2 'd' Variances.

- a. Use Variance. The Highway Commercial (HC) and Residential (R-4) zoning districts do not permit duplex and multi-family dwellings under §420.B and §407.B, respectively. Consequently, the application requires a use variance pursuant to N.J.S.A. 40:55D-70d(1). We note that the R-4, which constitutes a small portion of the southwest corner of the site, permits age-restricted apartments at a density not to exceed 10 units per acre. The proposed density of the project is 17.9 units per acre.
- b. Height Variances. The three apartment buildings are proposed to be 39.8 feet in height where §420.E.1.j limits height to 35 feet. A small portion of proposed Building B is located in the R-4 district, which also limits height to 35 feet under §408.E.5.a. Since the proposed heights are more than 10% of the height limit for a principal building this requires relief under N.J.S.A. 40:55D-70d(6).
- c. Floor Area Ratio Variance. The applicant proposes a floor area ratio of 0.47 where the HC district limits FAR to 0.25 for lots less than 5 acres (see §420.E.1.h.i). Exceeding the floor area ratio requires relief under N.J.S.A. 40:55D-70d(4).

- 3.3 The application requires several dimensional 'c' variances for the development proposal. The following table reflects the bulk standards for HC and R-4 zoning district as it relates to proposed development on proposed Lot 2.02. The remaining 47.8-acre tract which includes the shopping center and is known as



proposed Lot 2.01 appears to meet all bulk requirements. While the applicant indicated the subdivision plan was submitted with the revised site plan package, I did not receive the subdivision plan.

HC & R-4 Zone – Bulk Requirements					
Standard	HC Required	R-4 Required	Proposed Lot 2.01 (Shopping Center)	Proposed Lot 2.02 (Affordable Development)	Variance
Minimum Lot Area (Acres)	40,000 sf	60,000 sf	2,085,349 sf 47.87 acres	187,389 sf 4.30 acres	No
Minimum Lot Width	200 ft	-	1,530.4 ft	716.3 ft	No
Minimum Lot Frontage	200 ft	150 ft	<u>135.2 ft</u>	720.0 ft	<u>Yes</u>
Minimum Lot Depth	175 ft	-	470.2 ft	243.8 ft	No
Minimum Front Yard Setback	25 ft	50 ft	104.4 ft	25.2 ft	No
Minimum Side Yard Setback	25 ft	40 ft	46.5 ft	*	No
Minimum Rear Yard Setback	60 ft	50 ft	<u>43.0 ft</u>	63.6 ft	<u>Yes</u>
Maximum Impervious Surface Ratio	70%	50%	<u>75%</u>	56%	<u>Yes</u>
Minimum Usable Yard Area	-	20% of each yard		55.2%	No
Minimum Rear Yard Setback (Accessory Structure)	20 ft	-	<u>17.7 ft**</u>	-	<u>Yes</u>
Minimum Setback from Other Building (Accessory Structure)	50 ft	-	<u>19.4 ft</u>	<u>33.4 ft</u>	<u>Yes</u>



Notes:

- \* While the applicant updated the bulk requirement table on Sheet 6, the setback distance indicated appears to be incorrect. The applicant shall address the measurement discrepancy. Based on the revised building location, the building appears to comply with the side setback requirements and a variance is not needed. The applicant shall confirm.
- \*\* The applicant indicates that variances are required for accessory structure setbacks. The site plan shall be updated to depict the accessory structures not meeting the required setbacks for proposed lot 2.01.

4.0 Site Plan Comments

4.1 Tree Removal and Replacement. The applicant is proposing the removal of all existing trees within the proposed lot area, some of which are quite mature in order to develop the property as depicted in the proposed layout. As such, the applicant is required to conform with the Township's tree replacement requirements.

- a. In accordance with Section 541.F.8, specimen trees shall not be removed. The Township considers any tree that has a diameter of 30 inches or greater to be of specimen quality. The applicant shall provide the diameter measurements for all trees proposed to be removed from the development area. The applicant is proposing the removal of five (5) trees that are 30 inches or greater and has requested a design exception.
- b. Pursuant to Section 541.H, a minimum tree replacement density is required. The applicant has not provided the tree replacement density calculation. In order to determine compliance with the tree replacement requirements, the applicant shall provide the proposed tree density calculations that correlates with the proposed planting plan. While the applicant provided the tree replacement density calculations, in accordance with Section 541.I.4, the evergreen replacement trees shall be limited to 40% of the total number of replacement trees proposed. The applicant is exceeding this limit and should update the tree replacement plan to meet this requirement.

4.2 Parking and Circulation

- a. In accordance with Section 504, Table 5.2, 141 parking spaces (averages 2.01 parking spaces per unit) are required to service the proposed residential development. The applicant is proposing 102 parking spaces on proposed Lot 2.02. A variance from Section 504, Table 5.2 for a deficit of 39 parking spaces is required. In support of the variance request, the applicant has provided a parking study based on empirical data associated with other suburban type affordable housing developments the applicant built and manages.

The data provided indicates that the actual parking ratio for these suburban affordable developments range between 1.0 to 1.6 parking spaces per dwelling unit. Given the location of



the development as it relates to the rear of the shopping center and the loading activities that occur at the rear of the building, an adequate pedestrian circulation plan showing safe access from the development to the parking spaces should be provided as well. The applicant has provided for sidewalks that would connect the proposed development with all parking areas. There are also sidewalks that now connect to a new playground and dog park area located within the flood storage area.

- b. Pursuant to Section 530.F., the parking area shall be set back a minimum of 25 feet from the property line. The parking along the west property line is set back 15 feet. A variance is requested.
- c. In accordance with Section 530.I.1, accessible parking spaces shall be located within 100 feet of the residential entrances. The proposed locations of the ADA spaces are located further than 100 feet from the duplex dwelling units. The applicant shall address conformance with this requirement or request a design exception. The applicant has indicated a design exception is requested.
- d. The applicant should address whether the parking spaces will be assigned to specific dwelling units. The dead-end parking areas present circulation issues if turn around movements are needed and assigning parking spaces would help mitigate unnecessary circulation conflicts. Satisfied. The applicant updated the parking and circulation layout to remove all dead-end parking areas.
- e. In accordance with Section 526.C, areas designated as clear sight triangles shall remain free of visual obstructions between 2½ and 10 feet in height with the exception of street and traffic control signs, traffic control boxes, fire hydrants, lighting poles and field sited street trees as approved by the Municipal Engineer. Approximately (10) ten on-street parking spaces appear to be located wholly or partially in the sight triangle. The applicant shall address this conflict and make the necessary adjustments to the parking plan to ensure a clear sight triangle. Satisfied. The applicant removed all on-street parking spaces.
- f. Pursuant to Section 420.F.6, where appropriate, agreements providing for cross access for pedestrians and vehicles between adjacent lots or tracts shall be provided to reduce the amount of traffic on adjacent roads. The applicant should consider providing a vehicle connection to the shopping center to provide for an alternate vehicle circulation route that avoids traffic movements on Texas Avenue. In the alternative, the applicant should request a variance. While the applicant has provided an emergency access point to the shopping center, general vehicle circulation is not provided the same connection. The applicant has indicated a variance is requested.
- g. Pedestrian circulation
  - 1. The applicant is proposing pedestrian access from the residential development to the rear



of the shopping center in two locations. The applicant should depict the proposed pedestrian circulation/access to the shopping center sidewalks as the rear of the shopping center includes truck movements creating safety concerns. **Satisfied. The applicant updated the plans to provide for an improved pedestrian circulation system on and off site. The applicant should provide a planting plan for the site improvements on proposed Lot 2.01 to ensure the pedestrian movements are protected from truck traffic within the loading area.**

2. The proposed surface material providing access to the side entrances of the duplex units is not identified. The applicant shall provide an adequate hard surface material from the sidewalks to the side entrances. **Satisfied. The applicant updated the plans to clarify the location of sidewalks versus lawn and landscape areas.**

#### 4.3 Buffer and Plantings

- a. Buffer. In accordance with Section 525.H, landscaped buffers are required to screen any adverse impacts or nuisances on the site from any adjacent area. Pursuant to Table 5.10, the required buffer width shall measure 25 feet. While the applicant has met the minimum buffer width by providing a 35-foot wide buffer, 20 feet of the buffer is traversed by a gas easement which does not include any plantings leaving approximately 15 feet for plantings on a sloped berm area. The applicant is proposing the buffer plantings at the downside of the slope in a very narrow area.

Section 525.H.2 requires certain plant densities within the buffer area. The applicant shall confirm compliance with the required plant densities according to Table 5.11. In addition, the applicant shall consider planting the entire berm area to provide the required densities and to accomplish a taller screen planting closer to the residential dwelling units. **While the applicant has updated the landscape plan to provide a buffer planting within the island between the loading area on proposed Lot 2.01 and the parking area on proposed Lot 2.02, the evergreen plantings are now located at a lower elevation and further away from the apartment units. As such, the applicant is asking for a design exception from meeting the plant densities. Although the area available for planting is constrained with the proposed topographic changes and the existing easement, the layout of the development is creating the constraint. As a possible mitigation for the buffer distance and density design exceptions, the Board may want to consider requiring the installation of a larger planted size for the evergreen trees to help reduce the visual impact of the loading area on the affordable housing units.**

- b. Parking Lot Plantings.

1. In accordance with Section 525.L.1, the minimum width of landscape island located at the end of a parking aisle shall be 8 feet. There are several end landscape islands in the proposed layout that do not meet this minimum requirement and require a design exemption. **Satisfied. The revised parking layout provides the minimum landscape island width.**



2. Pursuant to Section 525.L.2, each landscape island with the parking area shall meet the minimum planting density as described in this requirement. The applicant shall confirm compliance with this requirement. At a minimum, the required shade trees should be provided for this development as there are large swaths of asphalt with limited green areas. The applicant is requesting a design exception due to the location of the underground stormwater system. It is still recommended that additional plantings be added within parking areas as there is limited tree and shrub plantings in what will be an area of significant paving.
- c. Street Trees. The applicant is proposing small ornamental cherry trees for the street tree planting in front of the duplex dwelling units. Columnar Red Maples (*Acer rubrum* 'Armstrong') are proposed for the remaining street frontage. Neither tree species is on the recommended street tree list in accordance with Table 5.4, 5.5 or 5.6. Given the significant trees that will be removed from this portion of the Texas Avenue street frontage, the applicant should utilize a street tree from Table 5.6 (Recommended Large Street Trees), which will ensure a robust streetscape. Partially satisfied. The applicant has provided acceptable substitutions. However, there is a row of alternating White Pine trees adjacent to the playground and dog park area. The applicant should provide testimony on the purpose of the White Pine planting. If buffering of the recreation area is the goal, a more comprehensive buffer plan is warranted that would include a variety of deciduous and evergreen trees and shrubs.
- d. Stormwater Management Basin.
  1. In accordance with Section 525.J.1.b., the interior of the stormwater basin should be planted with a wildflower or wet meadow grass mix. The applicant has not indicated the proposed groundcover planting. The planting plan should be updated to conform with this regulation. Satisfied. The applicant is providing a wet meadow grass mix.
  2. Pursuant to Section 525.J.1.e., the perimeter slopes shall be planted with specific planting rates for deciduous and evergreen species. The current planting plan does not provide for the required planting rates. The applicant shall comply with this requirement or request a design exception. The applicant is requesting a design exception due to the limited space along the perimeter of the flood storage area. While the required rates may not be achievable, there appears to be adequate planting area for additional shade and understory trees. The applicant should work with our office to provide an adequate planting plan for the flood storage area.
- e. General Comments.
  1. All Red Maple (*Acer rubrum*) species shall be locally sourced, and the plant schedule should include a note indicating same. Satisfied.
  2. The applicant shall update the planting schedule to include the required size of the plants in accordance with the ordinance. Some of the proposed plantings are smaller than what is required in the recommended planting tables. The applicant shall conform with this



requirement. Satisfied.

3. While Spirea is indicated as a recommended shrub species, it is an invasive species. The applicant should consider providing an alternate for this shrub plantings. Satisfied.
4. The applicant is proposing a deciduous shrub planting along the top of the retaining wall for the stormwater management basin. An evergreen shrub species should be provided instead to provide a more prominent shrub edge to the wall for safety reasons. Satisfied.
5. The landscape plan does not include the layout of the dog park. This plan should be updated to reflect the location of the dog park and appropriate shade trees should be added within the recreation areas.

#### 4.4 Lighting

- a. In accordance with Section 527.A.1, sufficient lighting shall be provided on each site or along roadways to ensure the security of property and to protect the safety of the residents. There are several areas on the site including the entrances for the duplex units as well as at the sidewalk intersections along Texas Avenue that are showing a zero footcandle illumination. The applicant shall provide sufficient lighting at these locations to ensure the safety of the residents in accordance with average illumination standards provided in Table 5.14. Satisfied.
- b. The location of the A-4 light standards adjacent to the duplex units should be coordinated with the internal sidewalk areas to avoid pedestrian conflicts. Satisfied.
- c. The lighting luminaire schedule should be updated to confirm the use of the PCAD Series and model numbers. Satisfied.
- d. Lighting is not proposed for the recreation areas. The applicant should address the lack of lighting in this area. While it may not be prudent to have lighting into the later evening for these areas, use of the recreation areas may occur in the winter months in the early evening when it gets darker earlier. The applicant should also address security lighting in the recreation area.

#### 4.5 Building Design

- a. In accordance with Section 420.F.2., all buildings shall be separated by a minimum of 25 feet provided such separation is to be used solely for pedestrian circulation. Proposed Building A and Building B are separated by 15 feet. A variance is required.
- b. The applicant has indicated a design waiver is needed for Section 531.a.2., which requires that building not exceed 240 lineal feet. Proposed Building A is approximately 170 lineal feet and Proposed Building B is approximately 165 lineal feet. The two longest buildings appear comply with this regulation. The applicant should address the request for this design waiver and its



applicability to the proposed building length. Satisfied. The applicant has removed this design waiver request.

- c. Pursuant to 531.A.4., each apartment unit above the ground floor shall have a balcony or terrace of at least 60 square feet. The units do not contain the required balcony. The applicant shall address conformance with this requirement or request a design exception.
- d. In accordance with Section 531.A.5., a minimum of 150 square feet of storage is required for each apartment unit. The applicant shall address compliance with this regulation or request a design exception.
- e. Pursuant to Section 531.A.8., access to apartment units should not require a vertical ascent over two stories. The applicant does not comply as the apartment buildings are comprised of apartment flats requiring a vertical ascent for three stories. A design exception is required.
- f. In accordance with Section 531.A.12., all exterior equipment shall be screened. The applicant shall indicate the locations of all utilities and utility meters and provide details on the proposed screening to ensure compliance with this regulation. The applicant is requesting a design exception.

#### 4.6 General Site Layout Comments

- a. Open Space and Recreation. The applicant has not provided for an area for active or passive recreation for the residents of the development. While this is a tight site, the applicant should be responsible for providing appropriate indoor and outdoor recreation and open space amenities. The applicant is proposing a playground and dog park area within the flood storage area with the revised layout. It is recommended that the applicant address how the flood storage area will impact permanent site improvements.
- b. Retaining Wall. The applicant should provide a cut sheet detail for the proposed retaining wall including proposed type and color of wall. Because the retaining wall will be almost 5 ½ feet at the midpoint of the wall section, it is recommended the wall be of a natural material to better blend into the landscape. In addition, wet tolerant plantings should be located along the wall to further blend the structure into the landscape.
- c. Refuse Disposal. Pursuant to Section 524.F., chain link fencing is not permitted for use in a residential development. The applicant shall revise the design for the refuse disposal to provide an opaque gate using similar material found on the building facades. In addition, the refuse disposal enclosure should be faced with materials that are compatible with the façade materials of the proposed residential buildings. Satisfied.
- d. Mail Delivery. The applicant shall address where mail delivery and pick up will be stationed on site. Satisfied.

#### 4.7 Affordable Housing Regulations. The applicant has indicated that testimony will be provided addressing the following requirements.





- a. **Bedroom Distribution.** Pursuant to COAH's prior round regulations, NJAC 5:93-7.3(a), and the Uniform Housing Affordability Controls ("UHAC"), NJAC 5:80-26.3(b), affordable developments that are not age-restricted shall be structured in conjunction with realistic market demands such that:
1. The combined number of efficiency and one-bedroom units is no greater than 20 percent of the total low- and moderate-income units;
  2. At least 30 percent of all low- and moderate-income units are two-bedroom units;
  3. At least 20 percent of all low- and moderate-income units are three-bedroom units;

The applicant shall confirm compliance with the bedroom distribution requirement.

- b. **Income Distribution.** The architectural plans should be updated to demonstrate conformance with the required income distribution for all units pursuant to the Uniform Housing Affordability Controls, N.J.A.C. 5:80-26.1 et. seq. or any successor regulation. In addition, the income distribution must be consistent with the FHA requirement that 13% of the units be affordable to very-low income households at 30% the regional median income, which supersedes the UHAC standard at NJAC 5:80-26.3(d) which says 10% of the units shall be affordable to households at 35% of the regional median income.
- c. **Deed Restrictions; Length of Controls.** COAH at NJAC 5:93-9.2(e) and UHAC at NJAC 5:80-26.11(a), state that newly constructed affordable units shall remain affordable to low- and moderate-income households for a period of at least 30 years until terminated by the municipality. The applicant should indicate the length of controls on the affordable units consistent with these requirements.
- d. **Accessibility/Adaptability.** The applicant should provide testimony regarding the compliance of plans with COAH's rules pertaining to accessibility/adaptability, including, but not limited to, NJAC 5:97-3.14.
- e. **Administrative Agent.** The applicant should identify the administrative agent per UHAC at NJAC 5:80-26.14 to handle affirmative marketing, establishing pricing, reviewing the deed restriction and long-term administration of the affordable units including monitoring.
- f. **Affirmative Marketing.** COAH at NJAC 5:93-11 and UHAC at NJAC 5:80-26.15 requires an affirmative marketing program for the affordable units. The applicant should provide a copy of the affirmative marketing plan.
- g. **Veterans' Preference.** Through a developer's agreement, a developer may agree to permit up to fifty (50%) percent of all affordable rental units to prefer veterans per NJSA 52:27D-311. The applicant should indicate what percent, if any, of the affordable units will prefer veterans.



- h. Affordable Housing Agreement. The applicant will need to enter into an affordable housing agreement with the Township as a condition of any approval.

## **5.0 Variance Considerations – “d” Variances**

“d(1)” Variance. The Municipal Land Use Law states the Board has the power to grant “d(1)” variances to permit prohibited uses (N.J.S.A. 40:55D-70(1)) “in particular cases and for special reasons.” This is the so-called positive criteria of a “d(1)” variance. Our courts have held that the promotion of the general welfare is the zoning purpose that most clearly amplifies the meaning of “special reasons.” (Medici v. BPR Co., 107 N.J. 1 (1987))

The applicant is proposing a residential development where 100% of the units will be occupied by low- and moderate-income households. This type of use has been found by the courts to be an inherently beneficial use. The benefit to the general welfare from an inherently beneficial use is derived from the use itself and thereby meeting the positive criteria which is the first prong of the use variance criteria. While the applicant can satisfy the positive criteria as an inherently beneficial use, it must satisfy the same negative criteria test as other d variance applications.

The Municipal Land Use Law (NJSA 40:55D-70) requires the applicant to satisfy 2 components of the negative criteria and case law requires satisfaction of one additional component for the use variance:

- a. The proposal will not create a “substantial detriment to the public good”; and
- b. The proposal will not create a “substantial detriment to the zone plan and zoning ordinance”.

- 5.2 “d(4)” Variance. MLUL also permits the Board to grant “d(4)” variances allowing for a variance from floor area ratio controls. Relief can be granted only upon showing “special reasons” for the variance. The Courts have held that the “Coventry Square” standards controls what constitutes special reasons. Rather than the applicant showing that the site is particularly well suited for more intense development, the applicant must show that the site will accommodate the problems associated with a floor area larger than permitted by ordinance.

- 5.3 “d(6)” Variance. The Board is also permitted to grant “d(6)” variances allowing for the height of a principal structure to exceed the maximum height permitted by 10 feet or 10% of the maximum height restriction. The Board is to weigh a height variance with a more relaxed standard as compared to other “d” variances. The standard requires the applicant to demonstrate that the site will accommodate problems associated with the proposed use with a greater height than permitted.

## **6.0 Variance Considerations – Dimensional ‘C’ Variances**

- 6.1 The Board has the power to grant “c(1)” or “hardship” variances to permit relief from zoning regulations where a hardship to conformance exists (N.J.S.A. 40:55D-70c(1)). Proving the existence of the hardship is the so-called “positive criteria”. The finding of a hardship must address the following:



- *“by reason of exceptional narrowness, shallowness, or shape of a specific piece of property,*
- *or by reason of exceptional topographic conditions or physical features uniquely affecting a specific piece of property, or*
- *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.”*

It should be noted that the finding of the hardship must be for the specific property in question – it must be unique to the area. Note also that a hardship variance cannot be granted by a self-created hardship or personal hardship of the applicant.

**6.2** The Board has the power to grant “c(2)” or “flexible” variances to permit relief from zoning regulations where an alternative proposal results in improved planning, as measured by the following (N.J.S.A. 40:55D-70c(2)).

- a. The purposes of the MLUL would be advanced by the deviation, and
- b. the benefits of the deviation from the zoning ordinance requirements would substantially outweigh any detriment.

It should be noted that the finding of the benefits must be for the specific property in question – it must be unique to the area. The zoning benefits resulting from permitting the deviation(s) must be for the community (“improved zoning and planning that will benefit the community”) and not merely for the private purposes of the owner. It has been held that the zoning benefits resulting from permitting the deviation(s) are not restricted to those directly obtained from permitting the deviation(s) at issue; the benefits of permitting the deviation can be considered in light of benefits resulting from the entire development proposed. Notwithstanding, the Board should consider only those purposes of zoning that are actually implicated by the variance relief sought.

**6.3** The Municipal Land Use Law (NJSA 40:55D-70) requires the applicant to satisfy 2 components of the negative criteria:

- a. The proposal will not create a “substantial detriment to the public good”
- b. The proposal will not create a “substantial detriment to the zone plan and zoning ordinance”

## **7.0 Variances and Design Exceptions Summary.**

The following variances and design exceptions are either requested or required with the current site plan proposal:

- a. ‘d’ Variances



1. Section 420.B & 420.H: "d(1)" use variance
  2. Section 420.E.1.j & 408.E.5.a: "d(6)" height variance
  3. Section 420.E.1.h.i: "d(4)" FAR variance
- b. Bulk 'c' Variances
1. **Section 420.E.1.b: Lot Frontage (HC zone – Lot 2.01)**
  2. Section 420.E.1.g: Rear Yard Setback (HC zone- Lot 2.01)
  3. Section 407.E.3.d: Side Yard Setback (R-4 zone)
  4. **Section 420.E.1.i.ii: Impervious Coverage (HC zone – Lot 2.01)**
  5. **Section 420.E.2.c.: Rear Yard Setback – Accessory Structure (HC zone – Lot 2.01)**
  6. **Section 420.E.2.e: Minimum Setback from Accessory Structure to Building (HC zone – both lots)**
  7. Section 420.F.6: Cross Access Provisions
  8. Section 420.F.2: Building Separation
  9. Section 504 Table 5.2: Parking Space Quantity
  10. Section 530.F: Parking Setback for proposed lot 2.02
- c. Design Exceptions
1. Section 541.F.8: Removal of Specimen Trees
  2. Section 531.A.4: Balcony Required
  3. Section 531.A.8: Exceeding Vertical Floor Assent
  4. Section 530.i.1: Accessible Parking Space Location
  5. Section 525.H: Buffer Distance
  6. Section 525.H.2: Buffer Planting Density
  7. Section 525.L.2: Planting Density in Parking Island
  8. Section 531.A.12: Screening of Utilities



## 8.0 Materials Reviewed

- a. Development application and supporting materials
- b. Preliminary and Final Site Plan, Major Subdivision Development Plans, prepared by Thomas J. Muller, PE, of Dynamic Engineering, dated April 15, 2020, revised to November 16, 2020 consisting of 23 sheets.
- c. Boundary and Partial Topographic Survey, prepared by Craig Black, PLS, of Dynamic Survey, LLC, dated June 6, 2019, consisting of two sheets.
- d. Major Subdivision Plat, prepared by Craig Black, PLS, of Dynamic Survey, LLC, dated June 24, 2020, consisting of two sheets.
- e. Preliminary Floor Plans and Elevations, prepared by Anthony D'Agosta, RA, of Inglese Architecture + Engineering, dated April 1, 2020, revised to October 9, 2020, consisting of ten sheets (A-1.00, A- 1.01, A-1.02, A-1.10, A-1.11, A-2.00, A- 2.01, A-2.02, A-2.10, A-2.11, A-3.00)
- f. Environmental Impact Statement, prepared by Thomas J. Muller, PE, PP, of Dynamic Engineering, dated April 2020.
- g. Community Impact Statement, prepared by RPM Development Group, dated July 9, 2020.
- h. *Preliminary/Final Site Plan-Minor Subdivision*, prepared by Dynamic Engineering, last revised September 26, 2019.
- i. Traffic Impact and Parking Assessment, prepared by Dynamic Engineering, dated April 15, 2020, supplemented October 8, 2020.
- j. Documents Supporting the Proposed Parking for Texas Avenue Redevelopment, prepared by Kevin Kavanaugh, VP, RPM Development Group, dated July 31, 2020.

## 9.0 Applicant Team

- 9.1 Applicant: RPM Development, Kevin Kavanaugh, VP, 77 Park Street, Montclair, NJ 07042. Telephone: 215-688-0432. Email: [kkavanaugh@rpmdev.com](mailto:kkavanaugh@rpmdev.com).
- 9.2 Attorney: Ryan Kennedy, Esq., Stevens & Lee, PC, 100 Lenox Drive, Suite 200, Lawrenceville, NJ 08648. Telephone: 609-243-6424. Email: [rpke@stevenslee.com](mailto:rpke@stevenslee.com).
- 9.3 Engineer: Thomas J. Muller, PE, Dynamic Engineering Consultants, PC, 1904 Main Street, Lake Como, NJ 07719. Telephone: 732-974-0198. Email: [tmuller@dynamiccec.com](mailto:tmuller@dynamiccec.com)
- 9.4 Architect: John Inglese, RA, Inglese Architecture + Engineering, 632 Pompton Avenue, Cedar Grove, NJ 07009. Telephone: 201-438-0081.



- C. Brenda Kraemer PE, PP, CME, Board Secretary/Assistant Municipal Engineer  
Edwin Schmierer, Esquire, Board Attorney  
James Kochenour, PE, Board Traffic Engineer  
Ryan Kennedy, Esq.  
Thomas Muller, PE

[https://kylemcmanus.sharepoint.com/sites/KyleMcManusAssociates/Municipal Projects/Lawrence/RPM Conflict/201207 RPM planner review3.docx](https://kylemcmanus.sharepoint.com/sites/KyleMcManusAssociates/Municipal%20Projects/Lawrence/RPM%20Conflict/201207%20RPM%20planner%20review3.docx)



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December 7, 2020

Ms. Brenda Kraemer, P.E., P.P., Assistant Municipal Engineer  
Division of Planning and Redevelopment  
Township of Lawrence  
Lawrence Township Municipal Building  
2207 Lawrenceville Road  
P.O. Box 6006  
Lawrenceville, NJ 08648

Re: RPM Development  
Preliminary and Final Major Site and Subdivision Plan  
Approvals with Use and Bulk Variance Approvals  
Comment Review Letter #2  
No. SP- 5/20, No. S - 2/20, and No. ZB-3/19  
2495 Brunswick Pike  
Block 2001, Lots 3, 60-66 and 68  
Lawrence Township, Mercer County, New Jersey

Dear Ms. Kraemer:

I am in receipt of the following information for review pertaining to an application for Preliminary and Final Major Site and Subdivision approvals with use and bulk variances for a 70 unit garden apartment development to be constructed along the south side of Texas Avenue to the rear of the existing Lawrence Shopping Center:

- One set of revised Preliminary and Final Major Site and Subdivision Plans (23 sheets) prepared by Dynamic Engineering Consultants, PC bearing a latest revision date of November 16, 2020
- One set of revised Architectural Floor plans and Elevations (11 sheets) prepared by Inglese Architecture and Engineering bearing a latest revision date of October 9, 2020
- One copy of a Document Submission Summary/Response letter prepared by Dynamic Engineering Consultants, PC dated November 20, 2020
- One copy of a Supplemental Traffic Analysis prepared by Dynamic Traffic, LLC, bearing a revision date of November 20, 2020

The development proposal calls for the construction of 70 affordable housing units consisting of 70 garden apartments contained within three, three-story buildings (a total of 58) units and six, two story duplexes (a total of 12 units).

These 70 units will be located along the south side of Texas Avenue to the north (and rear) of the existing Lawrence Shopping Center.

To the north (and across Texas Avenue) is single family residential housing. To the east and south is the Lawrence Shopping Center (and to the east of that is US Route 1). To the west is single family residential development.

Access to and from the site will be provided by a single, two-way driveway located approximately 425' west of a Texas Avenue access servicing the Lawrence Shopping Center and 85' west of Glenn Avenue. Both dimensions are center line-to-center line.

An emergency vehicle access is also proposed in the southwest corner of the site (with gated access to/from the Lawrence Shopping Center).

Parking for this site will be provided by-way-of 102 on-site surface parking spaces.

The proposed development is located in both the HC (Highway Commercial) District, as well as the R-4 (Residential 4) District. As such, the development is not a permitted use and will require a use variance along with other variances and design waivers.

I have completed my review of the above-referenced documents and offer the following comments for the Board's consideration (The following comments are addressed in the same order in which they were presented in my latest Comment Review Letter #1 dated September 2, 2020):

#### Supplemental Traffic Analysis

1. The trip generation data produced by the traffic engineer is based on a "multi-family, low rise" development. Pursuant to the "Definitions" section within Table 4.1 of the Residential Site Improvements Standards (R.S.I.S.), a low-rise apartment is a unit consisting of two-stories or less. Within proposed Building A, B, and C, these buildings are proposed as three-stories with apartments on all three floors, thereby qualifying these 58 units as "mid-rise" units. The traffic engineer used the trip generation projections for a "low-rise" multi-family use since its trip generation rates are higher than for a "mid-rise" multi-family use, thereby providing a more conservative estimate of the traffic to be generated by the proposed development.

*No further comment is required. This approach is acceptable.*

2. The site has apparently been designed to conform to R.S.I.S. standards (applicant to confirm this). To determine the applicability of the appropriate design parameters, the intensity of development is to be determined (in dwelling units per gross acre).

#### Satisfied

*The applicant has identified this project as a "high-intensity" development (16.28 units per gross acre) and the provisions of the R.S.I.S. will be incorporated into the site design as appropriate. Since this development is not a typical residential subdivision with typical residential subdivision with typical residential streets, the project combines provisions of the R.S.I.S. and Township Code requirements.*



3. The traffic engineer makes the statement that "... it is not anticipated that the proposed development will have any perceptible impact on the traffic operation of the adjacent roadway network." While it is noted that the proposed development will not generate a large volume of traffic, the above statement does not make any references to the existing traffic operational characteristics regarding the intersections of US Route 1 and Texas Avenue, and Princeton Pike and Texas Avenue. To the extent it is possible to do so, an objective assessment of the traffic operational characteristic at these two locations is to be provided.

In addition, to the extent it is possible to do so, an order of magnitude of the traffic volumes along Texas Avenue within the site frontage is to be provided.

Partially Satisfied

*The traffic engineer has provided an operational analysis of Texas Avenue's intersection with US Route 1 and the proposed site driveway. This analysis was completed pursuant to currently accepted traffic engineering industry standards. The results are in line with the traffic data which was collected, the traffic projections which were accomplished, and the traffic assumptions and analyses which were made.*

*Based on the Supplemental Traffic Analysis, the following questions/observations are made:*

- a) *Based on Dynamic's Response Letter of November 20, 2020, a statement is made that neither of the two existing intersections would meet the criteria for a traffic analysis as provided by the NJDOT or the Institute of Transportation Engineers. It is presumed that this statement is made with reference to the NJDOT's State Highway Access Management Code and its reference to a "significant increase in traffic volumes" caused by a development proposal. Given this presumed reference to the Access Management Code, it is noted that for the eastbound Texas Avenue left turn movement at US Route 1 for the PM peak hour, a potential "violation" of the Code would result, in that the Level of Service F for this movement is degraded by 8 seconds (276 seconds to 284 seconds). The question is raised as to what mitigation could be applied to address this condition.*
- b) *The traffic engineer provided information relative to queue lengths which could result for Texas Avenue eastbound during the PM peak hour. The traffic engineer indicates a resulting queue length for this movement of at least 549' with a further comment that the proposed site driveway is 865' from US Route 1, therefore it would not be impacted by this queue length. However, an assessment is to be made of the impact from this projected queue length on the operation of the Lawrence Shopping Center Driveway intersection along Texas Avenue which is approximately 425' closer to US Route 1 (or about 440' from it).*

*The total of 13 trips and 17 trips, respectively, for the AM and PM peak hours, to and from the intersection of Princeton Pike and Texas Avenue, will not lead to any appreciable traffic impacts at this intersection.*

4. Information is to be provided regarding the Assessment's reference to US Census data for the Census Tract 32.02. This information is to be provided for review. Also, justification is to be provided regarding the applicability of this data to this area and to this particular project.

Satisfied

*The applicant has provided information in support of the applicable census data for Census tract 32.02.*

*The boundaries for this tract were given which shows that the subject site falls within this tract. The number of housing units along with the number of vehicles associated with each housing unit was also provided. These two parameters (i.e., the number of vehicles and the number of housing units associated with the number of vehicles) lead to a vehicle usage of 1.08 vehicles per housing unit within the subject site's census tract.*

*In consideration of the provided census data and the testimony that was provided at the public hearing of September 16, 2020 a parking supply of 1.46 spaces per unit will be provided, which is acceptable. The proposed parking supply, therefore, is 102 spaces for 70 garden apartment units.*

5. The traffic engineer is to discuss the bases upon which the parking supply recommendations contained in the RSIS were developed and how they differ from the assumptions used to produce the parking recommendations proposed by the applicant and the traffic engineer.

While the traffic engineer's Assessment includes a reference to "alternative parking standards", the traffic engineer will need to make a compelling case on a point-by-point basis as to why its proposed parking supply recommendations should be used instead of those contained in the RSIS.

*Satisfied*

*Most numerical rates/indices used in the practice of traffic engineering, are based on averages. The parking rates used by R.S.I.S. are no exception. The rates have been established by reviewing data from all types of residential developments, some with high parking demand, some with low parking demand, the compilation of which gives rise to the "average" rates contained in the R.S.I.S. For affordable housing units, the low side of the average would prevail with the parking demand rate trending downwards as the percentage of affordable units increases. Thus, for a 100% affordable residential development, the parking rates would be expected to be lower than the RSIS parking rates which are based on all types of residential housing.*

6. In summary, from the provided Assessment, the trip generation projections produced for this project are acceptable based on an assumed land use for Multi-family Housing (Low-Rise).

However, additional information is to be provided to the extent it is possible to do so, regarding traffic flow conditions along Texas Avenue and at the intersections of US Route 1 and Texas Avenue, and Princeton Pike and Texas Avenue.

*Satisfied*

*Additional traffic analyses have been provided along Texas Avenue at its intersections with US Route 1 and Princeton Pike. The results of these analyses are discussed in Comment #3 above.*

Site Plan

1. Pursuant to the requirements of the New Jersey Administrative Code, Title 5, Section 5:21-4.14, Parking: Number of Spaces, Table 4.4, a parking requirement of 141 spaces results based on the one, two, and three-bedroom mix numbers for the proposed development. The applicant is proposing a parking supply

of 79 spaces for the 70 garden apartment units. Given these numbers, the Board would be asked to grant a parking variance for 62 spaces, a not insignificant, or de minimis number.

In support of the variance request, the applicant has provided the following information/documentation:

- A parking supply and parking usage summary of residential developments operated by the RPM Development Group.
- A copy of a Findings of Fact and Conclusions of Law for a 65-unit, multi-family affordable housing development located in Princeton (adopted July 18, 2019).
- A copy of a letter from the manager of Lawrence Shopping Center Associates, LLC.

This documentation gives rise to the following comments/questions:

- a) The data/information from the parking summary is to be explained.

Within the Usage Column, a number of blocks say "Full". Does this mean that a site's available parking is 100% utilized and if it does, is there a latent or excess parking demand which is not being met?

- b) Within the Usage/#Units column some percentages are shown. How are they produced and what do they represent?
- c) Within the City column, most of the designations could be considered to be "cities" or certainly more urban areas than this area of Lawrence Township. More urban areas with family demographics with more association to an urban environment and with more accessibility to mass transit opportunities and off-site parking provisions could materially impact a residential development's parking demand. This area of Lawrence Township would not be considered to be a traditional urban environment.
- d) It would be helpful to have some insight into what causes the fluctuations in the Parking Ratio column (from a low of 0.24 spaces per unit to 2.32 spaces per unit).
- e) There is a reference on page 13 of the Findings of Fact, to the Princeton Census data showing that a rental unit averaged approximately 1.15 cars per unit. Within the Traffic and Parking Assessment, for the Lawrence Township area, reference was made to a rental unit averaging 1.08 vehicles per unit. The basis for the development of these rates is to be provided as well as the applicability of this 1.08 vehicle per unit to this particular project.

**Partially Satisfied**

*Testimony was provided at the public hearing (virtual) on September 16, 2020 supporting the parking variance request as well as other documentation. The testimony and accompanying documentation made a supportable case for a parking supply ratio of 1.46 per unit.*

*The affordable apartment developments' parking demand which was provided (for nine developments) shows an average parking demand of 1.37 spaces/unit. The locations which were counted appear to represent more suburban communities along the lines of a Lawrence Township than more urbanized areas.*

*Only the two developments in Barnegat Township exhibited a parking demand greater than 1.46 spaces/unit. Are there reasons why these two could be higher?*

*At a parking supply ratio of 1.46 spaces/unit, 32 of the 70 proposed units could have a second vehicle.*

*Within the provided documentation was a Findings of Fact for a 65-unit affordable housing (apartments) development in Princeton. Has this development been built and occupied and if so, has any parking demand data been collected?*

*The Board is to consider including a condition of approval that after the thirty-fifth Certificate of Occupancy is issued for this development that a parking demand study be conducted to gauge the parking requirement being generated by the development. The results of this study will be provided to Lawrence Township for evaluation.*

2. The application is proposing 23 off-street parking spaces or 30% of the total parking supply. Parking is currently prohibited along both sides of Texas Avenue in this area. Introducing on-street parking into an area of higher traffic flows along Texas Avenue may not be in the best interest of traffic conditions along Texas Avenue. Also, this site is located in an area where traffic is slowing down for the traffic signal at US Route 1 and Texas Avenue, and also for traffic entering and exiting the Lawrence Shopping Center via the Texas Avenue access. There are also driveways and public streets along the north side of Texas Avenue that generate exiting and entering traffic movements within the proposed on-street parking area. The introduction of on-street parking could be another factor which impacts traffic movements along Texas Avenue.

The presence of on-street parking could also adversely impact the sight lines for motorists exiting the site as well as potentially blocking the view for turning motorists into the site of pedestrians using the sidewalk along Texas Avenue. It is recommended that the provisions for on-street parking be reviewed.

Satisfied

*The provision for on-street parking along Texas Avenue has been eliminated.*

3. Pursuant to Code Section 530B., Parking Location, all required off-street parking shall be located on the same lot or premises as the use served. Of the required/provided parking, 56 spaces are proposed on-site. Twenty-three spaces are provided on-street. If this provision of the Code cannot be followed and all required site parking is not provided on-site, a variance from this provision of the Code will need to be requested.

Satisfied

*The on-street parking has been eliminated.*

*A new subdivision line is being proposed to the rear of Buildings A and B. This new subdivision line is being created from land which is currently part of the Lawrence Shopping Center. The end result of this new subdivision will be to have all parking associated with the project to be "on-site" thereby not requiring a variance from this Code provision.*

4. Another critical aspect of the site design is the presence of two dead-end aisles which are undesirable design features. These features lead to inefficient and problematic site traffic circulation not only for residents and visitors but for first responders as well. Since this is a new use on undeveloped property, there is no reason that these design elements can't be eliminated, and a redesign accomplished.

Satisfied

*The referenced dead-end aisles which were internal to the site have been eliminated.*

*The proposed new 37 space parking row to the rear of Buildings A and B technically is a "dead-end" aisle. However, this parking row was created to satisfy the Code requirement for on-site parking. The west end of this row also provides access by way of shopping center property for emergency vehicles. This access is controlled by a chain link, double-swing gate with a Knox Box padlock.*

*Room for a turn-around area has also been provided at the west end of this parking row thereby mitigating the negative effects of a dead-end aisle.*

5. Code Section, 530 I.1, Parking Area design, Walking Distance, provides walking distances for various types of pedestrians (e.g. handicapped, elderly residents, other residents, etc.). The placement of a number of these spaces exceed these recommended walking distances. A conforming design is to be provided.

Satisfied

*With the elimination of the on-street parking and the provision for a parking row to the rear of Buildings A and B, the Walking Distance provisions have been met.*

6. The applicant has provided a letter from the manager of the Lawrence Shopping Center indicating a willingness to allow residents to use its property for parking. The closest parking appears to be to the rear of the center. This location raises concerns about mixing residential traffic with large trucks desiring to access the center's loading area to the rear, as well as walking distances to/from this area (See Comment #5 above). Security provisions are also a concern regarding pedestrians walking through this area in terms of the availability of pedestrian walking routes, lighting and mixing this traffic flow element in with large truck traffic.

If overflow parking is considered for the front of the center, the same concerns are raised plus the distance needing to be traveled by pedestrians coupled with the fact that the closest parking in front of the center would be in an area approved for an LA Fitness facility, a generator of a large parking requirement.

Satisfied

*The creation of a new subdivision line to the rear of the subject site has created an additional area for the parking of 37 vehicles. This new site area will be physically separated from the shopping center through the construction of vertical curbing and landscaping. Thus, the owner of the shopping center will become a party to the subdivision which should be made a condition of any approval.*

7. A design speed of 30 mph was used to establish the sight triangles along Texas Ave based on a posted speed limit of 25 mph. The prevailing speeds along Texas Avenue are 30-35 mph which would lead to a design speed of 40 mph which is what is to be used to establish the driveway sight triangles.

Satisfied

*Sight triangles for the proposed site driveway have been established with a 445' length in each direction of Texas Avenue which corresponds to an AASHTO design speed of 40 mph.*

8. Pursuant to Code Section 525 L.1., end islands are to be at least 8' wide. The end island at the end of the entrance driveway on its left side appears to be less than that (7-7 ½'). This island is to have a conforming minimum width of 8'.

Partially Satisfied

*All proposed end islands are 8' wide which conforms to Code. There are two landscaped islands within parking bays which are 8' and 8 ½' wide, respectively. Islands between parking bays are to be a minimum of 10' wide. It appears that the mid-bay island to the rear of Buildings A and B could easily be made 10' wide.*

*I will defer to the Board's Planner regarding this matter.*

9. The proposed sight triangles are to be shown on the Landscape Plan, Sheet 8 of 17. In addition, a note is to be added to the Landscape Plan that all trees within the sight triangle are to be limbed to a minimum height of 10', and ground vegetation is to be kept pruned to a height not exceeding 30".

Partially Satisfied

*The requested note has been added to the Landscape Plan (Sheet 11 of 23). The placement of the first two pine trees to the east of the site driveway is to be reviewed. It appears that there could be some encroachment into the sight triangle to the east by one or both of these trees and they may not be able to be limbed to an acceptable height. I will defer to the Board's Planner regarding this matter.*

10. Street lighting is to be provided at the two access drives.

Partially Satisfied

*And A-1 lighting fixture has been shown on the southwest corner of the site driveway along with the corresponding footcandles adjacent to it. It appears that the vehicular traffic footcandles are slightly less than required for this type of application (see Table 5.13).*

*I will defer to the Board's Planner with regards to this matter.*

11. Two pedestrian connections are shown leading from the proposed site to the rear of the shopping center. What provisions will exist/be provided to accommodate those pedestrians using these connections to travel through the shopping center area?

These connections will lead to/from the rear loading area for the shopping center.

Partially Satisfied

*The two referenced pedestrian connections have been eliminated. In their place, a pedestrian path will be created from Building A in an easterly direction to a proposed pedestrian crossing which will lead to*

*the front of the shopping center. The pedestrian crossing will cross the access to/from the shopping center's rear loading area.*

*The area on the south side of this loading area access way will be built out to create an access 30' wide. Consideration is to be given to relocating the proposed pedestrian crossing to the east to the intersection of the loading area access way and the site driveway from Texas Avenue. Any additional sidewalk is to be constructed which would complete this path between the development and the front of the shopping center.*

*If this crosswalk is placed as described above, No Pedestrian Crossing (Symbol) and Use Crosswalk signs [(R9-3 and R9-3bp (L or R))] are to be installed where the pedestrian crossing is currently shown.*

12. All signs are to be called out with their MUTCD designation on the Site Plan (Sheet 5 of 17). Additional signs will be needed at and for the site's two access driveways. One Way signs (R6-1 L or R) will be needed at both ends of both driveways. Providing the MUTCD sign designations will permit the determination of where signs are to be placed and their types and if additional signs are required.

Open

*All MUTCD signs are to be called out on the Site Plan (Sheet 6 of 23), e.g. STOP, Handicap Accessible Parking. It is also recommended that a No Outlet sign (W14-2) be installed on the end island at the east end of the rear 37 space parking row. On the west end of this parking row, a No Parking Any Time sign (R7-1) is to be provided. The area to the west of this row is to be kept clear to be used by vehicles wishing to turn around.*

13. The proposed stop line across the exiting driveway needs to be moved back to allow a clear pedestrian path across this driveway. Crosswalks are also to be provided across both driveways at their intersections with Texas Avenue.

Satisfied

*Only one site driveway is being provided along Texas Avenue. A painted pedestrian crosswalk is shown across this driveway along with a properly placed stop line.*

14. All handicap-accessible parking is to be dimensioned and the handicap accessible signing shown and called out. It is noted that for the van-accessible space, if only one is proposed, its parking area is to be to the left of the accessible area.

Partially Satisfied

*The five proposed handicap-accessible parking spaces have been dimensioned.*

*The appropriate signing is to be called out for each of the five spaces. This will help to establish (on the Site Plan) which space or spaces will be van accessible.*

*On the Construction Details (Sheet 14 of 23), the ADA Stall Markings Detail shows a concrete wheel stop. If this device will not be required, it is to be removed from the detail. If required, it should be shown on the Site Plan.*

15. The following comments pertain to sheet 12 of 17 (Construction Details):

- a) A separate striping detail is to be provided for each of the two site driveways. The details provided on this sheet do not match what is shown on the Site Plan.

Satisfied

*The striping details for the two proposed driveways have been eliminated. A striping detail for the single driveway is to be provided. The DO NOT ENTER Striping Detail is to be eliminated.*

- b) All MUTCD signs are to be depicted and designated with their sizes shown.

Partially Satisfied

*The Do Not Enter and One Way signs can be eliminated. They are not to be used.*

*The W16-7P Plaque should have the appropriate "L" or "R" shown with it.*

*No Pedestrian Crossing and Use Crosswalk signs (R9-3 and R9-3b/L or R) are to be shown. (These four signs may or may not be included depending on where the pedestrian crossing at the loading area access is located).*

- c) A note is to be provided that all signs are to be mounted on breakaway posts.

Satisfied

*A Sign Post Detail has been provided with a note that it is to be of a breakaway post construction. A note is to be added that all MUTCD signs are to be supported by a breakaway sign post.*

- d) From the ADA Parallel Curb Ramp Detail, it appears as if only the "head" of the accessible area will have flush curb. It is recommended that the handicap-accessible signing be placed behind the sidewalk/ramp area. With this sign placement, these signs should be able to be placed on breakaway posts instead of concrete-filled bollards.

Open

*This comment needs to be addressed.*

- e) Within the A.D.A. Parking Sign on Bollard detail, the Van-Accessible Plaque is to be designated as R7-8P and shown with a size of 18" x 9". The Penalty Plate is to have the R7-8P designation removed. This sign can be called out as Penalty Plate and shown with a size 10" x 12".

Partially Satisfied

*The requested revisions have been made except that the Penalty Plate is to be shown with a size of 10" x 12" (the width dimension comes first).*

16. A Vehicle Circulation Plan has been provided for a typical Lawrence Township fire truck (Sheet 17 of 17). The following comments are made relative to this plan:



- a) There are three locations shown where vehicle overhang encroaches into areas beyond a curb line. Commentary is to be provided regarding any resulting impacts arising from these encroachments.
- b) There also appears to be some overhang encroachment of some parking spaces within the parking row of 14, on the south side of the site. These encroachments are to be resolved/addressed.
- c) Access into and out of the two proposed dead-end aisles is to be shown/addressed. (See Comment #4 above).

a), b), c) Partially Satisfied

*Based on the current Vehicle Circulation Plan for a fire truck (Sheet 20 of 23), there appears to be no encroachment of any parking stalls.*

*There appears to be minimal encroachment of any curblines.*

*The site engineer is to comment on a potential encroachment of the site driveway's easterly curbline and a fire truck impacting with the proposed guiderail along this side.*

*A template is also to be provided for a fire truck entering the development from the shopping center property and traversing through the site.*

*The Township Fire Marshall will need to approve these plans.*

17. The intersection of the two parking/circulation aisles on the east side of the site gives rise to an expanse of pavement within which it will be difficult to maintain well-defined travel paths. This condition is to be addressed.

Satisfied

*A proposed painted cross-hatched area is shown at the tip of a landscaped planting area. These markings will serve to help direct drivers through this area. A "stop" location is also shown at the end of this planting area which will serve to control potentially conflicting traffic movements into and through this area. A Stop sign is to be shown on the tip of the island and the stop line is to be pulled back to be in line with it.*

18. In summary, there are a number of concerns and issues that, from a traffic perspective, are problematic for the development of the site as proposed.

These include, but are not limited to, parking supply quantity and how the site parking is to be provided and configured, and the overall site design.

Satisfied

*From an overall site development standpoint, the major concerns regarding the site's parking supply, the location and configuration of the site parking and the site's overall design have been addressed. A single*

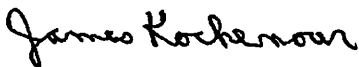
*two-way access will now serve the site, thereby eliminating the need for a second curb cut along Texas Avenue. The parking layout also produces a configuration wherein the site's parking is economically distributed throughout the entire site.*

Additional Comment

19. Is it possible to reduce the angle of entry for a trash truck accessing the dumpster area, so it can enter and depart this area without having to travel through a large segment of the site? Can the grading in this area be resolved to allow this to happen?

This completes my comments.

Very truly yours,  
ARORA and ASSOCIATES, P.C.



James Kochenour, P.E.  
Project Manager

NO RLY COMMENTS 11/23/20

**TOWNSHIP OF LAWRENCE**  
**Division of Planning and Redevelopment**

TO: Brenda Kraemer, Assistant Municipal Engineer  
Kendra Lelie, Special Planning Consultant  
James Kockenour, Traffic Consultant  
Michael Rodgers, Construction Official  
Public Safety Coordinating Committee - attn. Edward Tencza  
Environmental Resources Committee  
Shade Tree Advisory Committee  
Carol Chamberlain, Health Officer  
Greg Whitehead, Public Works Director

FROM: Susan Snook, Administrative Secretary *SP*

SUBJECT: Bulk and Use Variance Application No. ZB-3/19  
Major Site Plan - Preliminary & Final Approval Application No. SP-5/20  
Major Subdivision - Preliminary and Final Approval Application No. S-2/20  
RPM Development, 2495 Brunswick Pike  
Tax Map Page 20.01, Block 2001, Lots 3, 60 - 66 and 68

NO Fire Comments 11/24/2020  
NO PLUG COMMENTS *JE*

ELECTRICAL SUBCODES

SITE LTG. CONTRACTOR  
WILL NEED SUBMIT

BUILDING ELECTRICAL PERMIT, IF  
DIFFERENT FROM BUILDING  
ELECTRICAL CONTRACTOR  
TRENCH & SUPPORT BASE  
INSPECTION REQUIRED

DATE: November 23, 2020

Attached are revised documents for the RPM Development to be reviewed at the December 16, 2020 Zoning Board Meeting with regard to the above-referenced application for the proposed residential development:

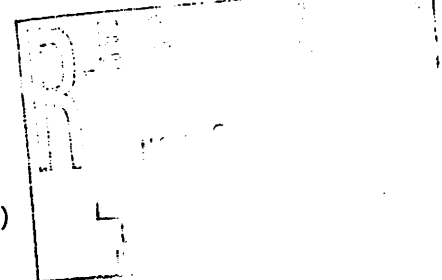
- Letter from Dynamic Engineering, dated November 20, 2020
- Stormwater Management, Groundwater Recharge and Water Quality Analysis, revision dated November 2020
- Cover Sheet, Sheet 1 of 23, revision dated November 16, 2020
- Aerial Map, Sheet 2 of 23, revision dated November 16, 2020
- General Notes, Sheet 3 of 23, revision dated November 16, 2020
- Overall Site Plan, Sheet 4 of 23, revision dated November 16, 2020
- Demolition Plan, Sheet 5 of 23, revision dated November 16, 2020
- Site Plan, Sheet 6 of 23, revision dated November 16, 2020
- Grading Plan, Sheet 7 of 23, revision dated November 16, 2020
- Drainage & Utility Plan, Sheet 8 of 23, revision dated November 16, 2020
- Utility Profiles, Sheet 9 of 23 and 10 of 23, revision dated November 16, 2020
- Landscape Plan, Sheet 11 of 23, revision dated November 16, 2020
- Lighting Plan, Sheet 12 of 23, revision dated November 16, 2020
- Construction Details, Sheets 13 of 23 thru 18 of 23, revision dated November 16, 2020
- Vehicle Circulation Plan (SU-30), Sheet 19 of 23, revision dated November 16, 2020
- Vehicle Circulation Plan (Fire Truck), Sheet 20 of 23, revision dated November 16, 2020
- Vehicle Circulation Plan A (WB-67), Sheet 21 of 23, revision dated November 16, 2020
- Vehicle Circulation Plan B (WB-67), Sheet 22 of 23, revision dated November 16, 2020
- Vehicle Circulation Plan C (WB-67), Sheet 23 of 23, revision dated November 16, 2020

please review these documents and submit your report to this office as soon as possible, but no later than Monday, December 7, 2020 so that reports may be provided to the applicant and Board members prior to the meeting.

SJS  
g:\engineering\rpm development\plan review distribution letter.doc

Attachments

cc: Edwin W. Schmierer, Esq., Zoning Board Attorney (w/attn.)



# LAWRENCE TOWNSHIP HEALTH DEPARTMENT

2207 Lawrenceville Road - Box 6006 - Lawrenceville, New Jersey 08648

Telephone: (609) 844-7089

RECEIVED

DEC - 7 2020

Date: December 5, 2020

To: Brenda Kraemer, Assistant Municipal Engineer

From: Carol Chamberlain, Health Officer

ENGINEERING DEPT.

## 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: <u>Site Plan/Subdivision</u>

PROJECT NAME: RPM Development

LOCATION: 2495 Brunswick Pike

BLOCK: 2001 LOT # 3, 60-66 & 68 ZB-3//19

OWNER: RPM Development Phone: \_\_\_\_\_

ENGINEER/ARCHITECT: Dynamic Engineering

ADDRESS: 1904 Main Street Lake Como, NJ 07719

PHONE: 732-974-0198

☐ APPROVAL

☐ DISAPPROVAL

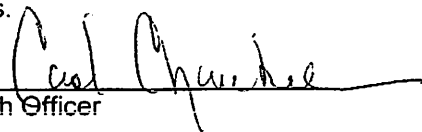
☒ APPROVAL WITH CONDITIONS

## COMMENTS:

Due to the close proximity to the rear of the Lawrence Shopping Center where loading on unloading of  
inventory and trash occurs on a regular basis, it is strongly recommended deed notices and/or lease  
agreements of occupants include acknowledgement of such activities.

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

Health Officer



**TOWNSHIP OF LAWRENCE**

**Department of Public Safety  
Division of Code Enforcement  
Edward Tencza, Fire Marshal**

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TO: Zoning/Planning Board  
FROM: Edward Tencza  
SUBJECT: RPM Development 2495 Brunswick Pike, Lawrence NJ

DATE: December 9, 2020

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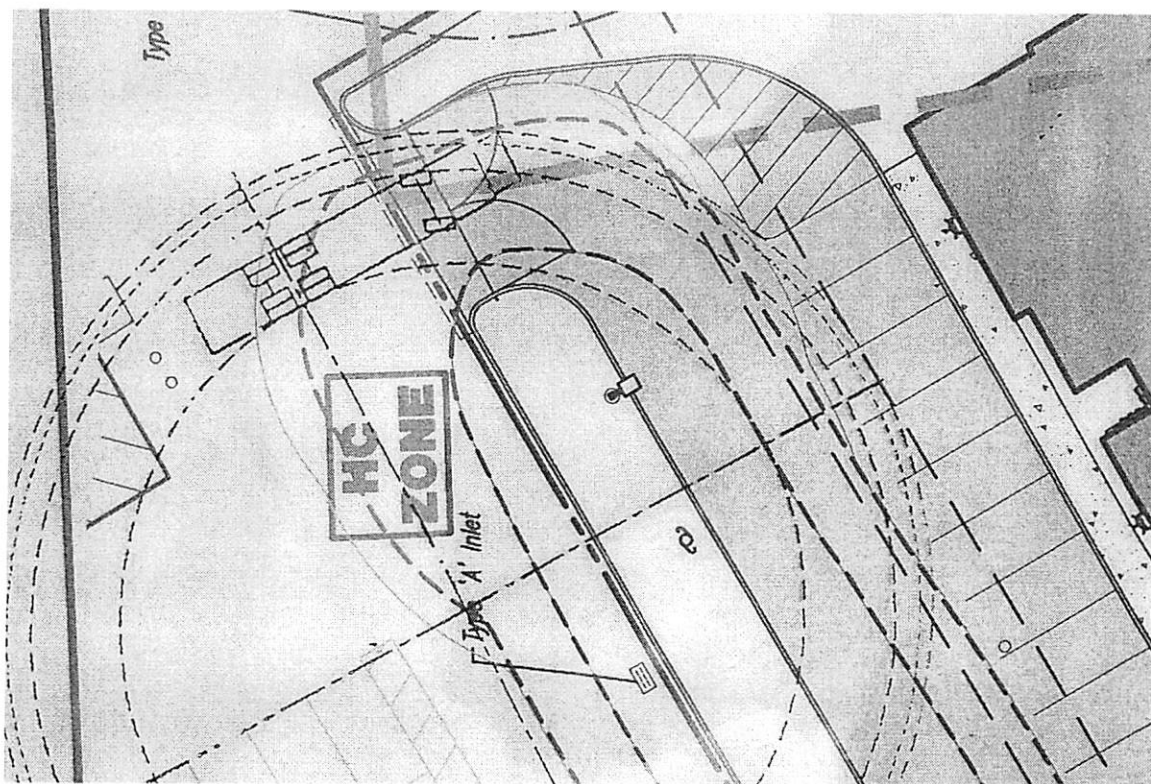
After review of the site proposal for fire truck access, The Lawrenceville Tower Ladder will still will have access restrictions. I have noted using my radius templet of Lawrenceville Tower Ladder, access into complex to parking area (picture #1) the Tower ladder does not clear the median or first parking space, the rear entrance from Lawrence Shopping center (picture #2) the Tower Ladder does not clear parking spots, next location is the rear left turn from rear entrance (picture #3) the Tower Ladder will not make the turn.

Designated Fire Lane Marking on curb line as well as signage will be required within complex as per Lawrence Township Ordinance #2060-10. Yellow striping along length of curb as indicated in site map provided and "NO PARKING FIRE LANE" signs.

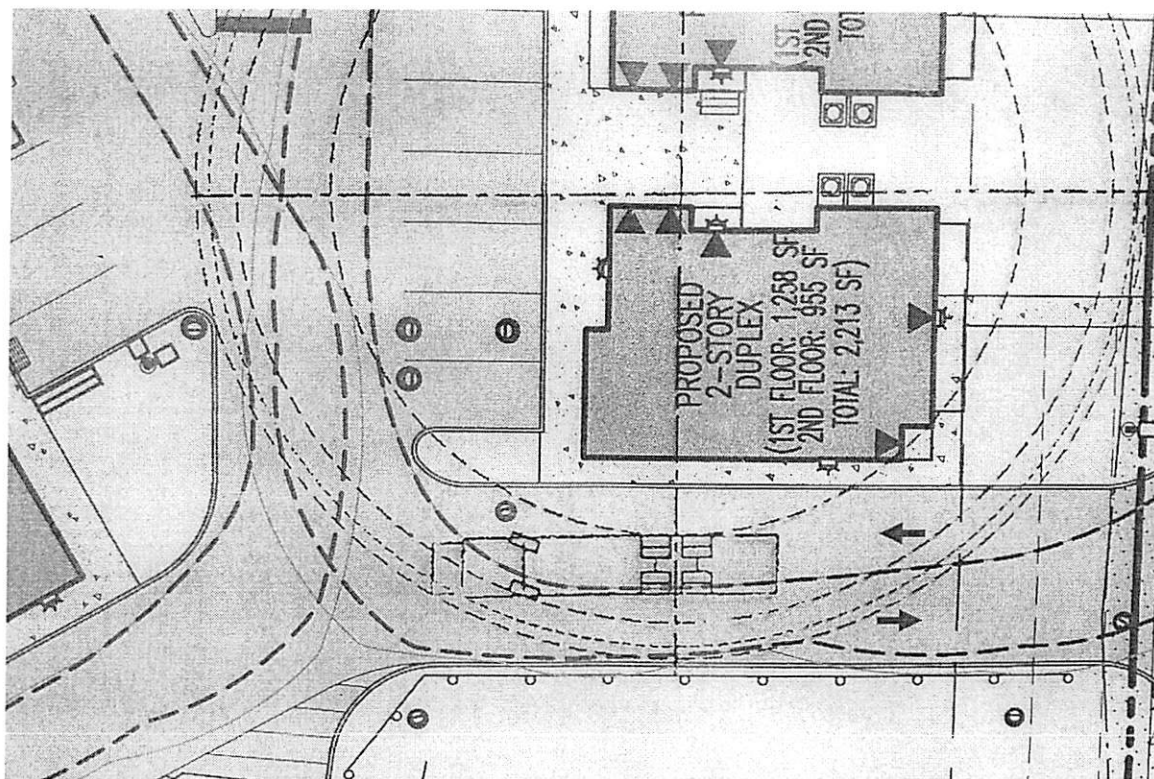


Edward C. Tencza

Fire Marshal



Picture #2



Picture #1





