

6 January 2023

Christopher J. Kok, PP, AICP
Township Planner
Township of Wayne
475 Valley Road
Wayne, NJ 07470

**Re: Planning Review #1
Planning Board Case PB-2022-013
1361 Alps Road, Block 2329, Lots 1 and 17
AG-RW Wayne Owner LLC
Preliminary and Final Site Plan and Subdivision
Langan Project No.: 100925301**

Dear Mr. Kok:

We are in receipt of your planning review letter dated September 27, 2022 regarding The Villas at Wayne Hills preliminary & final site plan and major subdivision application, assigned as Planning Board Case PB-2022-013.

Planning Comments & Requested Testimony

Comment 1

Variances required from standards of MLR3D-2 District (Section 134-54.6)

- a. The MLR3D-2 district standards were developed in conjunction with the prior owner of the property as part of the Mt. Laurel affordable housing settlement process. Given the specific zoning provided to the site, there should not be any variance relief required from this section.
- b. The MLR3D-2 ordinance did not include a zoning map designating the proposed single family dwellings on Olga Street as being zoned R-30. As such, these units were not anticipated to be included in the permitted development yield, but as the ordinance is currently drafted, these units do apply, causing the proposed number of units to exceed the maximum permitted in the MLR3D-2. Nonetheless, the total number of units proposed matches that approved under the Settlement Agreement with the Township.
- c. Subsequent to settlement of the GAF site and adoption of the MLR3D-2 ordinance, the NJDEP adopted new stormwater regulations requiring substantial changes to the site design. Additionally, the new owner of the site made certain design choices (such as converting affordable units from apartments to townhouses) that now require variance relief.
- d. The Township is working with the Applicant to amend the settlement agreement and zoning ordinance as needed to resolve these issues. Variances from the MLR3D-2 should be avoided.

Response 1

Based upon the amended settlement agreement and zoning ordinance that were adopted by the Township of Wayne and the review comments, it is our understanding the revised plans have only one request for relief for a variance from the MLR3D-2 zone with Section 134-62.1.A with to providing garages on all units. The affordable housing unit's parking is provide at-grade based upon the architectural type of units provided.

Comment 2

Architecture

- a. Applicant shall provide proposed building heights for all townhouse buildings per the Township's definition of building height as applicable to the MLR3D-2.
- b. Plans for the McPherson Grand shall be clarified to show which options are proposed and to remove options that are not currently proposed. Plans appear to show 3 to 3.5 story dwellings and rear loaded garage options which either require variance relief or are not applicable based upon the site design.

Response 2

- a. **Building height calculations are provided as an attachment showing compliance with the Township's definition of building height and the maximum building heights allowable in the MLR3D-2 zone based upon the strictest scenario of the shortest building and associated surrounding grades. All other units are less in height based upon this strictest scenario.**
- b. **Revised architectural plans shall be provided under separate cover, showing an "X" through the sections and elevations which are not applicable for this proposed development. Please note that no changes to the unit types proposed to be included in the development, the information will be provided for clarification.**

Comment 3

Provision of Garages:

- a. Applicant shall provide testimony as to whether the affordable units can be provided with garage access. Recently the Planning Board was presented with a site plan application for the construction of townhomes as part of a Mt. Laurel affordable housing settlement. Each vertical townhouse contained three units and two of the three were provided garage space. Variance relief from the provision of garages was only required for 7 of the 21 affordable units (7 of the 105 total units).

Response 3

RSIS is silent on the requirement of garages being provided for all residential units; therefore, a variance is requested from Township of Wayne Ordinance Section 134-62.1.A for proposed dwelling units without a garage. Drawing G1006 is annotated with the request for the variance. The affordable housing units are provided at-grade (surface) off-street parking based upon the architectural type of units provided. Please note the variance is requested for only 20% of the overall project therefore, 80% of the units comply with the requirement.

Comment 4

Vehicular Circulation

- a. Applicant shall provide testimony as to the feasibility of using all-way stop designs at internal intersections.
- b. Applicant shall provide testimony regarding any applications before the Passaic County Planning Board and whether a traffic signal will be required at Alps Road or whether the site will be subject to a right-in/right-out restriction.

Response 4

- a. **All-way stop designs at every road intersection are a safety hazard and are not a recommendation nor a requirement of MUTCD standards or guidelines. A concurring opinion was provided by the Township of Wayne municipal engineer at meetings held between Township of Wayne planning and engineering officials, Langan, and representatives from AG-RW Wayne Owner LLC on November 4 and November 7, 2022.**
- b. **Testimony shall be provided.**

Comment 5

Parking

- a. The parking summary included on page 6 of the Preliminary and Final Site Plan set is incorrect. Correct values are as follows:

Use	Ratio	Units	Spaces
Single Family (unspecified bedrooms)	2.5	10	25
Townhouse (unspecified bedrooms)	2.3	349	802.7
Townhouse (1-bedroom)	1.8	18	32.4
Townhouse (2-bedrooms)	2.3	45	103.5
Townhouse (3-bedrooms)	2.4	27	64.8
Total	N/A	449	1,029

Applicant proposes 1,625 parking spaces, which is substantially greater than required by RSIS standards.

- b. Each of the McPherson Grand, Malvern, and Merion units are provided with a two stall garage and a driveway of sufficient length to park one vehicle per stall.
- c. The Johnson/Turner affordable units do not provide garages and instead rely on surface parking spaces either as off-street parking or 90 degree on-street parking. In areas in which these units are proposed, 40-42 parking spaces are located within close proximity.
- d. No electric vehicle service equipment (EVSE) is shown. Based on the total number of parking spaces proposed, 244 spaces are required to be provided with EVSE. 82 shall be provided by the date of issuance of certificate of occupancy (CO), with 81 additional spaces equipped within 3 years of the CO and a final 81 additional spaces equipped within 6 years of the CO.

Applicant shall provide testimony as to their plan to conform to this requirement. 5% of all EVSE shall be installed in ADA accessible spaces.

Response 5

- a. **Proposed parking tables have been provided on Drawing GI006. The total number of required parking spaces for the entire development has been calculated to be 1,205, and a total of 1,659 parking spaces are proposed. The market-rate townhouse and single-family home proposed parking counts are higher than the required number of spaces because each of these units provided a 2 car garage and driveway combination, which by RSIS definition, provides 3.5 parking spaces per unit. Furthermore, the market-rate townhouse units require guest parking at a rate of 0.5 spaces per unit. This stems from the fact that there is no shared parking between townhouse units, so additional guest parking must be provided; the 0.5 spaces per unit for guest parking for the affordable units is incorporated into the required parking requirement because the surface parking spaces are shared and not assigned.**
- b. **Acknowledged.**
- c. **Acknowledged.**
- d. **A proposed EV parking summary table has been provided on Drawing GI006. For the entire development, a total of 181 make-ready EV parking spaces are required. A total of 181 make-ready EV parking spaces are proposed (or will be amended accordingly if the law is revised), within the garages of the market-rate townhouse units and 10 single-family homes being made to be EV-ready, and 2 additional EV parking spaces being provided at the clubhouse. Therefore, a total of 183 make-ready EV spaces will be provided (subject to changes to the laws).**

Comment 6

Pedestrian Circulation

- a. As noted above, there are several areas in which pedestrian connectivity is lacking. This lacking connectivity is found primarily at intersections, but also near off-street parking areas. In general, applicant shall revise the plans to include the following:
 - i. Intersection Crossings: crossings provided across all legs of streets at intersections. In cases where the location of townhouse driveways or other features make such a change infeasible, connectivity shall be provided to connect all sidewalks at the intersection, even if one leg of the intersection is not provided with a direct crossing.
 - ii. Off-Street Parking: crossings provided across all off-street parking driveways as well as crossings across the street located as close to the off-street parking entrance/access sidewalk as feasible.
- b. There are several areas of small 90 degree parking where the sidewalk is diverted around the parking area. This increases the distance that pedestrians are required to walk while providing limited benefit in terms of parking. Applicant should look for opportunities to consolidate these parking areas or to shift them into off-street areas where feasible.

- c. There are several areas where the sidewalk closely follows the perimeter of the road/on-street parking which results in a longer travel path for pedestrians while not providing any functional benefit. Applicant should revise the plans to create more efficient pedestrian pathways.
- d. Applicant is encouraged to look for ways to provide a mid-block pathways as follows:
 - i. Between Roads B, C, and D, ideally in close proximity to the intersection of Road H with Road D
 - ii. Between Roads B and C, ideally in close proximity to the intersection of Road F with Road C.
 - iii. Between Roads H and K, ideally in close proximity to the intersection of Road F

Response 6

- a. **Additional sidewalks, accessible ramps, and crosswalks have been provided for additional pedestrian connectivity at road intersections and at-grade surface off-street parking areas; refer to Drawings CS100 through CS112.**
- b. **These small parking areas are proposed in order to meet the market-rate townhouse guest parking requirement, and have been dispersed throughout the development for their shared use. Sidewalks around these parking areas have been designed in accordance with RSIS standards.**
- c. **More efficient sidewalk routes have been provided at these areas near intersections; refer to Drawings CS100 through CS112.**
- d. **Additional mid-block pathways are not feasible due to the significant grade changes between these roads; the amount of required grade change would necessitate these routes to be non-accessible and have multiple sets of stairs, which becomes a hazard during the winter months. Pedestrians walking between units also becomes a privacy concern for residents.**

Comment 7

Site Amenities

- a. Applicant shall provide a clearer drawing showing and labelling the variety of outdoor amenities proposed at the clubhouse area.

Response 7

Additional labels have been added to the amenity area by the clubhouse; refer to Drawing CS106.

Comment 8

Signage

- a. Planning Department does not object to the size of the proposed signage.

Response 8
Acknowledged.

Comment 9

Lighting

- a. Proposed lighting does not appear to be evenly distributed throughout the proposed streets. Lighting shown on Road A between Road B and Road C is a good example of consistent coverage, whereas, lighting on Road H between Road D and the beginning of the townhouses is a good example of poor spacing of lighting. Applicant shall provide testimony as to means to install more even and sufficient lighting.

Response 9

The amount of lighting proposed for this development is typical and appropriate for a suburban residential development, with increased lighting at surface parking areas and road intersections, and the appropriate lighting required for visibility along all other roadways. Testimony shall be provided.

Comment 10

Landscaping

- a. Applicant shall provide testimony regarding the ability to install more trees along internal streets. In particular, Applicant shall provide testimony regarding the ability to plant trees between driveways of individual townhouse units. The portion of Road K south of Road I is a good example of how trees can be incorporated along the streets, whereas Road H between Road I and road J is a good example of an insufficient number of trees.

Response 10

Additional trees and plantings have been provided throughout the development; refer to Drawings LP100 through LP112. In terms of tree plantings along the streets, trees have been placed in landscape areas that are wide enough to accommodate and promote a healthy life for the tree; narrow landscape strips and islands (less than 6 feet in width) are not suitable for planting. The landscape islands between driveways of the A-type townhouse units are only 4 feet wide, which are not considered suitable for tree plantings, and also present a hindrance for residents opening their car doors. Trees are proposed in front of the townhouse units that have a suitable width of landscape island.

Comment 11

Stormwater Management

- a. Applicant proposes substantial development on a large, sloped piece of land. The Planning Department has heard concerns from several nearby residents regarding the impact this project will have on stormwater runoff. Given the importance of stormwater management, Applicant is requested to provide thorough and clear testimony on stormwater in regards to the following:
 - i. General Overview
 1. Conceptual basis for stormwater management

2. Analysis of site
3. Choice of points of analysis
4. Why the different drainage systems were routed to each of the points of analysis

ii. Scope of Impact

1. Impacts on the subject property
2. Impacts on adjacent properties
3. Impacts on drainage infrastructure between the subject property and Packanack Lake
4. Impacts on Packanack Lake

iii. Topics

1. Impact of runoff, including total runoff, peak hour runoff, and sufficiency of existing and proposed infrastructure to handle runoff.
2. Water quality, including:
 - a. The amount of erosion or sedimentation likely to result from the project
 - b. The usage of fertilizer on-site and amount of fertilizer that will drain off-site. Of particular concern is any accumulations that could result in algal blooms in Packanack Lake.
3. Infiltration, including amount of water currently and proposed to be infiltrated on-site.

Response 11

Acknowledged. Testimony shall be provided.

Comment 12

Waste Management

- a. Applicant shall provide testimony as to how waste will be managed on site, including for the single-family dwellings, the market rate townhouses, and the affordable townhouses. Applicant shall provide testimony as to whether recycling will be provided with the on-site dumpsters.

Response 12

Appropriately sized trash enclosure areas are provided in proximity to each of the affordable housing buildings, and the enclosure areas are sized to accommodate both trash and recycling dumpsters. The market rate townhouses and single-family homes shall have individual trash and recycling cans that shall be stored in the garages and placed curbside only on pickup days by a private trash hauler. Testimony shall be provided.

We trust that these revisions meet your approval and we look forward to your expedited review. Please feel free to contact me directly at 973-560-4987 with any questions.

Sincerely,
Langan Engineering and Environmental Services, Inc.



John Coté, PE, LEED AP
Associate Principal/VP

JCC/kk

Enclosure(s): Preliminary & Final Site Plans, dated last revised 1/6/2023
Major Subdivision Plans, dated last revised 1/6/2023
Stormwater Management Report, dated last revised 1/6/2023
Stormwater Operation & Maintenance Manual, dated last revised 1/6/2023

CC:

NJ Certificate of Authorization No. 24GA27996400
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