

6 July 2023

Christopher P. Statile, P.A.  
Professional Engineers and Planners  
3 Fir Court  
Oakland, NJ 07436

**Re: Engineering Review #2  
The Villas at Wayne Hills  
Block 2329, Lot No. 1 & 17  
1361 Alps Road, Wayne, NJ  
Langan Project No.: 100925301**

Dear Mr. Statile:

We are in receipt of three of your review letters dated February 28, 2023, March 28, 2023, and May 5, 2023 regarding the Villas at Wayne Hills Major Site Plan and Subdivision application. For the purpose of this comment response letter, Langan is addressing the comments issued in the May 5, 2023 review letter, as this is the most recent version of the letter that includes all comments from the previous two letters.

The following comments were offered, and Langan's response to each comment is provided:

## **FINAL COMMENTS:**

Should the Board consider granting Preliminary and Final Major Site Plan with Design Standard Exceptions approval, the following Engineering Conditions should be attached:

### **Comment 1**

Prior to issuance of a Building Permit or any work being done on the site, whichever comes first, the applicant shall:

- A. Submit revised plans for Engineering Division review and approval addressing all review comments, including any other special conditions and/or notes imposed by the Board.
- B. Receive all required State and County approvals and Township permits including, but not limited to:
  - 1) HEPSCD Soil Erosion Control plan certification.
  - 2) NJDEP Flood Hazard Area Verification.
  - 3) NJDEP Flood Hazard Area Permit.
  - 4) County of Passaic Planning Board or Waiver letter. As of March 23, 2023, the approval has been withheld pending revisions.
  - 5) NJDEP Wetlands Letter of Interpretation (LOI).
  - 6) NJDEP Wetlands Permit(s).
  - 7) Wayne Township Special Flood Hazard Area Permit (if required)

- 8) NJDEP Treatment Works Approval (TWA-1) (if required)
  - 9) Water Main Extension Permit
- C. Have remitted payment for all outstanding fees and contributions, including but not limited to:
- 1) Township wide off-tract drainage assessment (Chapter 134-10.3 of the Township Code). Applicant shall provide calculations of both the "Pre-Development" and the "Post-Development" C-factors based upon the rational Method for the calculation of this fee.
  - 2) Sewer Connection fee
  - 3) Water Connection fee
- D. At least one (1) week prior to commencement of work, set up and attend a Pre-construction meeting between himself, his engineer, his contractor, representatives of the County, representatives of the NJDOT, affected utility companies, Township Engineer, Township Inspector, Township Planner, Zoning Officer, representatives of the Building Department and the Parks Department to discuss the requirements and regulations for on-site construction. Five (5) sets of construction drawings reflecting all conditions as approved by the Board and the Engineering Division shall be submitted at least one (1) week in advance of the pre-construction meeting for stamping and distribution.
- E. The applicant shall notify the HEPSCD at least forty-eight (48) hours prior to any land disturbance activity. Proof of notification shall be provided to the Engineering Division upon request.
- F. Prior to the issuance of a Building Permit, the applicant shall submit a certified copy of the deed of record showing that the Maintenance Plan for the Stormwater Management Measures have been recorded upon the Deed of Record for the property in question, as required under NJAC 7.8-5.8(d).

### Response 1

**Acknowledged. As it pertains to requirement C.1, further clarification on the fee shall be provided, as the project is a residential development in a residential zoning district, and the C-Factor method for the calculation of this fee is specified as being only for projects in non-residential zones according to Township of Wayne Code Chapter 134-10.3.A.(2).**

### Comment 2

Upon commencement of and during construction of the project, the applicant shall:

- A. Delineate on site the limits of disturbance as approved by the Board with soil erosion silt fence, or in the absence of silt fence requirements, snow fence. No clearing, tree cutting, or construction work shall occur on the site until the limits of disturbance and soil erosion control measures are in place and have been approved in the field by the Township Engineer.

- B. Construct the soil erosion control measures and stormwater infiltration system as the first item of work. The stormwater infiltration system shall be made fully functional, and all runoff from the project while under construction shall be directed into it. In addition, temporary fencing or the permanent fence and gate shall be installed around the basin. Clearing and tree cutting shall not occur until erosion control measures are in place and approved in the field by the Engineering Inspector.
- C. Should any dirt spill or tract onto the Township, County and/or State roads attributed to this project, the applicant and/or his contractor shall clean up same prior to the end of the work day and shall implement corrective measures to prevent same from re-occurring.
- D. Should any soil and/or sediment deposition occur attributed to this project which adversely affects surrounding drainage courses and/or properties, the applicant and/or his contractor shall prior to the end of the work day abate same, clean up the sediment, and shall repair and/or reinforce the soil erosion control measures to eliminate such erosion.
- E. Cover each temporary inoperative fire hydrant with a suitable bag for easy identification so as to prevent problems during required emergency use, and notify the Fire Official of such hydrant locations.
- F. Request and obtain engineering inspection, as per Chapter 134-113 of the Township Code, of all improvements. Work shall not be covered until inspected and passed/approved. Installation of public improvements shall not be performed on Saturdays, Sundays and/or Township holidays unless authorized in advance by the Township Engineer.

**Response 2**  
**Acknowledged.**

**Comment 3**

Prior to the issuance of any Certificate of Occupancy, the applicant shall:

- A. Have completed all on-site and off-site improvements, including but not limited to pavement, drainage, storm water detention/water quality system, curbing, sidewalks, striping, permanent stabilization and lighting
- B. Have submitted a professional engineer's certification that the stormwater infiltration system including outlet control structure(s) and the water quality/system(s) has been constructed to the required volume and orifice sizes/elevations in accordance with the approved design
- C. Request Title 39 for traffic enforcement approval from Town Council

**Response 3**

**Acknowledged with the understanding that on-site and off-site improvements will be completed commiserate with the infrastructure required to support the units applying for Certificates of Occupancy.**

#### **Comment 4**

The applicant is advised of the following:

- A. Any blasting of rock shall require a Township Blasting Operations Permit and full compliance with all the provisions of the Wayne Township Blasting Regulations in Chapter 52 of the Township Code.
- B. Performance Bonds may be returned upon satisfactory completion of the site work and/or issuance of Final Certificate of Occupancy. A letter requesting the return of same shall be filed with the Township Clerk, with a copy to the Township Engineer.
- C. Should the proposed lighting as shown on the site plan cause any glare or annoyance to adjoining neighbors, roads and/or other properties after its installation, the owner shall correct same at his expense and at the direction of the Township Engineer.

#### **Response 4**

**Acknowledged.**

#### **Attachment A – Design Waivers requested by the Applicant**

- a) 134-72.4.C(1) Township Code requires the minimum storm drain size to be 15” inside diameter. Some sections of pipe (between CB6-3 to CB6-8 and MH6-1 to CB62) do not meet this requirement. We do not object to the granting of this design waiver.
- b) 134-72.4.C(2) Township Code requires drainage pipe materials to be concrete RCP where PVC is proposed. We do not object in the granting of this design waiver if adequate soil/pavement cover is provided.
- c) 134-72.4.C(5) Township Code requires headwalls or flared ends to be constructed with riprap at the inlet and outlet of all drains. Design waivers are requested for FES1-3, 4-3, 4-4, 5-3, 5-4, 5-6, 57 and HW2-1. Calculations were provided showing these outlets have design flow exit velocities less than the required threshold for riprap in accordance with the Standards for Soil Erosion and Sediment Control design manual. The Township Engineer and Board has the authority to require riprap if there is doubt of stability.
- d) 134-72.4.C(7) Township Code requires inlets to be limited a runoff area of 5,000 SF. Forty-four (44) inlets receive between 5,000 SF and 10,000 SF of impervious runoff. Eight (8) inlets receive between 10,000 SF to 20,000 SF of impervious runoff. Double inlets are proposed at these locations. Two (2) inlets receive in excess of 20,000 SF of impervious runoff. Double inlets are also proposed at these locations. We do not object in the granting of this design waiver if the applicant changes the two (2) inlets that receive in excess of 20,000 SF of impervious runoff (CDB2-1 and CDB2-11) to triple

inlets.

- e) 134-72.4.C(8) Township Code requires pipes to have a minimum 3 ft. of cover. Less than 3 ft. in some areas is proposed. The applicant should provide testimony as to why the pipes cannot be lowered. We do not object to the granting of this design waiver if the pipe manufacturer specifications allow for the proposed shallow cover to carry motor vehicle/truck loads.

**Attachment A Response:**

**Acknowledged. Inlets CB2-1 and CB2-11 have been revised from double inlets to triple inlets.**

**Attachment B – Design Waivers required but not requested by the Applicant**

- a) 134-77.E(1) Township Code requires lighting intensity in parking lots to be between 0.5 and 1.0 lumens. The proposed intensity exceeds 1.0 lumens in many areas. We do not object to the granting of this design waiver.
- b) 134-77.E(3) Township Code requires lighting intensity at the property line to be 0.1 lumens. Proposed intensity exceeds 0.1 lumens only at the Old Homestead Road Extension(private). We do not object to the granting of this design waiver.
- c) 134-71.B Township Code requires cul-de-sacs to have a minimum cartway width of 26.0 feet. The Olga Street cul-de-sac extension will be dedicated to the Township and is proposed with a cartway width of 24.0 feet. We do not object to the granting of this design waiver. However, the Township may wish to restrict parking to one side of the street to ensure emergency vehicle passage.

**Attachment B Response:**

**Acknowledged. No on-street parking is proposed on Olga Street. Refer to Drawing CS105 and GI004 for signage added to Olga Street.**

**Attachment C – Required Plan Revisions**

**Comment 1**

Revise sheet CS506 to show:

- A. Locking gate for the detention basin per 134-72.4.C.(10) or request for a design waiver.

**Response 1**

**A note has been added to the Access Gate detail on Drawing CS506 that all access gates to stormwater management basins shall be equipped with secure locking systems.**

## **Comment 2**

Revise sheet CS102 to show:

- A. Callout for interlocking grass pavers at the terminus of Old Homestead Road.

## **Response 2**

**A note has been added to Drawing CS102 to callout the proposed interlocking grass pavers at the terminus of Old Homestead Road.**

## **Comment 3**

Revise sheet CS505 to show:

- A. 5-inch compacted-depth HMA base course (134-74.2.M.(2)) or request for a design waiver.

## **Response 3**

**The applicant requests a design waiver to utilize a 4-inch compacted depth HMA base course. The 4-inch compacted depth meets RSIS requirements set forth in N.J.A.C. 5:21-4.19.**

## **Comment 4**

The mountable curbs at the access points for detention ponds 3D, 4B, 4F, 4J, 5B, 5 & 5D

should be specifically called on the plans as "DC" for clarity during construction.

## **Response 4**

**The mountable curbs at the maintenance access paths into the basins have had a "MC" label added, in order to distinguish them from depressed curbs utilized at the driveway aprons; refer to drawings CS101 through CS112.**

## **Comment 5**

Detectable warning mats must be provided at Old Homestead/Road G, Road G at Road C, Road A and at all pedestrian crossings (i.e. guest parking lots). These ramps are open to the public and the Township may require additional safety measures to assist those with sight impairments. The applicant should provide testimony as to the benefit of not providing the colored tactile mats.

## **Response 5**

**All accessible ramps shall have detectable warning surface mats installed; refer to the details provided on Drawings CS503 and CS504.**

## **Comment 6**

Barrier-free parking should be dispersed to every parking area. All barrier-free parking spaces are provided at the affordable buildings or the clubhouse. While we realize that the bulk of use for these spaces will occur at these locations, no other barrier-free spaces are provided anywhere else on the site. Of the approximately 80 guest spaces that reside west of the clubhouse/affordable buildings, none are proposed as barrier-free. Additionally, the barrier-free spaces at the affordable buildings should be centered on the building or split to both sides at the building access points.

#### **Response 6**

**The accessible parking spaces in front of affordable buildings 8, 11, 23, and 32 have been moved to be centered on the respective buildings; refer to Drawings CS102, CS103, and CS107. The accessible parking spaces in front of affordable building 25 remain unchanged due to grading constraints but are located directly in front of the building and meet ADA design requirements. The remainder of the accessible guest parking spaces are located in the two parking areas closest to the clubhouse; refer to Drawings CS102 and CS106. Due to the relatively steep topography of the site, the majority of the road network has grades in excess of 2%**

#### **Comment 7**

The barrier-free ramp details must be site/location specific so as there is no confusion on which ramp 'type' is required during construction. This simplifies the Township's construction inspection of the ramps and avoids conflicts in the field.

#### **Response 7**

**The ramp types have been labeled on the site plans; refer to Drawings CS101 through CS112.**

#### **Comment 8**

The trash enclosure details appear inconsistent from the site plan. The man doors are on the opposite side of the gates but travel paths that allow access to the man doors have not been shown on the site plan. Additionally, the gates on the diagonally aligned dumpsters (those opposite buildings 23, 28, 33) may swing into the roadway. While we understand that the design is to keep the gates closed at all times, there is a tendency for the collector not to close and lock the gates after trash pickups. The alignment of the dumpsters opposite buildings Nos. 8 and 11 are more appropriate as the gates will not interfere with traffic if they are left open.

#### **Response 8**

**The trash enclosure detail and the site plans have been revised accordingly; refer to Drawings CS101 through CS112 and Drawing CS506. The depth of the proposed enclosure area has been reduced from 12 feet to 10 feet in order to provide additional clearance from the enclosure and access gates to the roadways. The HOA shall be responsible for ensuring that the trash enclosure gates remain closed outside of pickup operations; residents shall only be permitted to access the trash enclosure area from the rear access opening.**

#### **Comment 9**

Detention ponds 3A, 3B & 4K do not appear to have maintenance access ways provided.

#### **Response 9**

**Grass paver maintenance paths have been added to access bioretention basins 3A, 3B, and 4K; refer to Drawings CS106 and CS112.**

#### **Comment 10**

Fire hydrants must be approved by the local Fire Code Official. The need and location of

fire sprinkler building connections must also be identified by the Official. Thereafter, parking prohibitions may be necessary to emergency access vehicle connections. The hydrants at the end of Road H and by building 63 may be difficult to access with fire apparatus. Placement of fire hydrants and light fixtures should consider possible over-run of curbs by apparatus in emergencies and by placed within the curb tangents.

**Response 10**

**The hydrants provided at the end of Road H and by Building 63 serve as blow-off hydrants at the end of dead-end water mains; there are additional fire hydrants in the vicinity of those areas that also serve to provide coverage to the buildings in those areas in the event of an emergency.**

**Comment 11**

A minimum 10 ft. level lawn platform behind all units for fire department ladders placement to the 2nd story has been provided. These must not be altered during construction.

**Response 11**

**Acknowledged.**

**Comment 12**

The applicant has provided a lengthy digital report from an LSRP clearing the site of contaminated soils.

**Response 12**

**Acknowledged.**

**Comment 13**

The applicant must provide maximum wall heights and specify which wall construction details apply to each wall proposed on the site plans.

**Response 13**

**Maximum wall heights have been provided on Drawings CG101 through CG112. The type of retaining wall being utilized will be determined during the preparation of construction documents. Retaining wall designs, signed and sealed by a professional engineer licensed in the state of New Jersey, shall be submitted for review prior to construction.**

**Comment 14**

A list of proposed street names for the Township's consideration and approval must be provided.

**Response 14**

**A list of proposed street names shall be provided for the Township's consideration upon final site plan and major subdivision approval.**

**Comment 15**

Although the NJ default Statutory speed limit for residential streets is 25MPH, the



applicant has proposed the use of 15 MPH speed limit signs.

**Response 15  
Acknowledged.**

**Comment 16**

There is a proposed drainage easement to the Township of Wayne which includes a bioretention basin that services the Olga Street right-of-way. Testimony on the responsibility of maintenance of this basin must be provided and included in the approval.

**Response 16  
Testimony of maintenance of this basin has been provided.**

**Comment 17**

The applicant must provide a written agreement when the RSIS standards are exceeded as set forth in RSIS Section 5.21-3.6.

**Response 17  
A written agreement shall be prepared and submitted upon final site plan and major subdivision approval to ensure that the agreement properly documents all approved exceedances.**

**Comment 18**

Provide testimony why the Road K cul-de-sac is proposed with a 70 ft. radius which exceeds the RSIS.

**Response 18  
Testimony regarding the Road K cul-de-sac 70-foot radius has been provided.**

**Comment 19**

The Tax Assessor shall approve all proposed lot numbers and unit addresses.

**Response 19  
Acknowledged. The major subdivision plans shall be sent to the Tax Assessor to approve all proposed lot numbers.**

**Comment 20**

The requirement for EV spaces is being met by wiring the individual market rate units. Of the 202 "public" parking spaces, two "public" EV stations have been provided on the site (at the clubhouse). These appear to be the only EV stations available to the affordable housing units and are located quite a distance from the dwelling units. While the need for EV stations at guest parking may not be warranted, EV stations should be made more easily accessible to the affordable units.

## **Response 20**

**Electrical conduit infrastructure is proposed to be installed to create two future (make-ready) EV parking spaces in front of each of the five affordable buildings; refer to Drawings CU102, CU103, CU106, and CU107.**

## **Comment 21**

There are minor discrepancies between the drainage plans and the rip-rap apron details. The applicant should confirm that the rip-rap aprons will be constructed at 0% grade, as indicated on the detail.

## **Response 21**

**The grading and drainage plans have been revised accordingly to provide a 0% slope across the riprap aprons; refer to Drawings CG100 through CG125.**

## **Comment 22**

Our office is in receipt of a comment letter by One Water Consulting, LLC dated February 2, 2022 on behalf of the Packanack Lake Country Club & Community Association. These comments generally concern drainage from the site and mitigation due to environmental. The applicant should address these comments to the satisfaction of the Board.

## **Response 22**

**The referenced letter is not part of the record and therefore no response is required or appropriate. However, we have been in communication with counsel for the Association repeatedly seeking an opportunity to discuss the Association's concerns.**

## **Attachment D – Stormwater Management**

The applicant provided a Stormwater Management Report titled "Stormwater Management Report, Two Volumes, The Villas at Wayne Hills, Block 2329, Lot Nos. 1 & 17, Wayne Township, Passaic County, New Jersey by Langan Engineering. dated April 29, 2022, revised to January 6, 2023.

The proposed development meets the definition of "Major Development" because the redevelopment disturbs over 1 acre of land and increases regulated motor vehicle surface by more than one-quarter acres.

### Non- Structural Stormwater Strategies: NJAC 7:8-5.3

The applicant HAS IDENTIFIED non-structural strategies to be used on-site. The applicant HAS submitted a Low Impact Development Checklist for the site.

### Groundwater Recharge NJAC 7:8-5.4

The subject site is located within Metropolitan Planning Area however, portions of the project site are undeveloped, and wooded areas are the predominant land cover type. Therefore, NJAC 7:8-5.4.(b).1.i., one hundred (100%) percent of the average annual pre-construction groundwater recharge volume for the disturbed area of the project must be maintained in the post-construction

condition. The submitted design calculations showing compliance with these regulations appear acceptable.

#### Stormwater Quantity NJAC 7:8-5.6

The applicant HAS shown compliance with stormwater quantity via the following method:

a. Stormwater runoff intensities and required reductions to show compliance with 7:8-5.6.(b)3 have been provided. Eleven points of analysis were provided to show how the site meets these requirements. Appropriate reductions in the pre-construction and post –construction peak runoff rates of stormwater leaving the site for the 2, 10 and 100 year storms. The calculations appear acceptable.

#### Water Quality NJAC 7:8-5.5

As per NJAC 7:8-5.5, stormwater runoff quality standards are applicable when the major development results in an increase of one quarter acre or more of regulated motor vehicle surface. The applicant has provided calculations and methodologies outlined in the NJ Stormwater Best Management Practices Manual which area acceptable.

#### Operation and Maintenance Manual NJAC 7.8-5.8

An Operation and Maintenance manual HAS been submitted. See Other Comments #1.

#### **Attachment D Response: Acknowledged.**

#### **OTHER COMMENTS:**

##### **Comment 1**

The Operation and Maintenance Manual requires the following additional actions after any approvals:

- a. The Manual needs to be recorded with the deed at the office of the County Clerk.
- b. The party responsible for maintenance needs to file an annual report with the Township of Wayne.

##### **Response 1 Acknowledged.**

##### **Comment 2**

MH6-1 appears to tie into existing drainage on Alps Road. The applicant intends to tie additional drainage from the site interior into the municipal system at this point. Testimony on the need and suitability for this tie in should be provided.

##### **Response 2**

**Testimony has been provided. The proposed conveyance system that ties into the existing system within Alps Road predominantly conveys runoff generated from the subject site**

**and offsite areas that contribute to this system in the existing condition. This existing conveyance network within Alps Road is identified as Point of Analysis 6 (POA-6) in the stormwater management report, and peak discharge rates in the post-construction condition are less than or equal to the pre-construction peak runoff rates for all design storm events.**

### **Comment 3**

Flow separators/diverters are needed in the bio-retention basins to ensure runoff is evenly distributed within the basins for percolation. The Township has the authority to require the separators/diverters to ensure the entire basin is being utilized during storm events.

### **Response 3**

**All basins have been designed in accordance with the standards and regulations outlined in the New Jersey Stormwater Best Management Practices (BMP) Manual, and their designs have been approved by NJDEP as part of the flood hazard area permitting for the project site. We contacted Valda Opara, the NJDEP reviewer for this project, who stated that she will not permit any alterations to the basin designs (such as these flow diverters/separators) that do not follow the standards set forth in the BMP Manual. All of the basins are designed with the first orifice opening elevated relative to the bottom of the storage area; therefore, water must evenly rise throughout the basins during storm events in order to discharge from the basins via the outlet control structures. Additionally, flow diverters/separators are not a design requirement of the Wayne Township code as it pertains to stormwater management and drainage design.**

### **Comment 4**

Some inlets and manholes remain in the guest parking walking paths. Inlet heads freeze in the winter and become hazardous. Testimony should be provided as to why they cannot be relocated to avoid potential pedestrian pathways.

### **Response 4**

**Inlets and manholes have been relocated outside of walking paths within accessible parking areas; refer to Drawings CG113 through CG125. Inlet placement throughout the rest of the site follows general engineering practices of locating inlets within gutter lines at the back of parking spaces (to drain away from the buildings) or along curbs at the front of parking spaces, where appropriate based upon the drainage patterns of the proposed design.**

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 7/6/2023  
Major Subdivision Plans, dated last revised 7/6/2023  
Stormwater Management Report, dated last revised 7/6/2023  
Stormwater Operation & Maintenance Manual, dated last revised 7/6/2023  
Building Height Calculations, dated 7/7/2023  
Exhibit EX10 – Temporary Model Unit Parking Site & Grading Plans, dated 7/6/2023

cc: Meryl Gonchar, Sills Cummis & Gross P.C.  
Corey Klein, Sills Cummis & Gross P.C.  
Jonathan Grebow, AG-RW Wayne Owner, LLC  
Brett Owings, AG-RW Wayne Owner, LLC