

WARE MALCOMB

ARCHITECTURE
PLANNING
INTERIORS

CIVIL ENGINEERING
BRANDING
BUILDING MEASUREMENT

December 7, 2020

VIA E-Mail Delivery: ncarter@edgewaterpark-nj.com

Mrs. Marian Johnson, Chairwoman

Edgewater Park Planning Board Township of Edgewater Park
400 Delanco Road
Edgewater Park, NJ 08010

**Re: Preliminary Major Site Plan with Use and Bulk Variances
Edgewater Storage, LLC Block 404, Lot 2.02
4201 S Route 130
Edgewater Park Township**

Attn: Ms. Nicole Carter, Planning Board Secretary

On behalf of the applicant, Edgewater Storage, LLC, enclosed please find electronic copies of the following documents for your review and approval:

- One (1) copy of the Civil Site Plans entitled "Preliminary Site Plans – Edgewater Park Self Storage," dated July 21, 2020, prepared by Ware Malcomb, revised through 12/07/2020;
- One (1) copy of the Architectural Plans entitled "Edgewater Park Self Storage," last revised December 7, 2020, prepared by Ware Malcomb;
- One (1) copy of the "Drainage Report – Edgewater Park Self Storage," dated July 21, 2020, prepared by Ware Malcomb, last revised December 7, 2020;
- One (1) copy of the Exhibits to be presented at the public hearing.

On November 24, 2020 and December 1, 2020, the applicant and Edgewater Park Township professionals held a virtual to review the technical comments received from Environmental Resolutions, Inc., dated November 17, 2020. This letter is the formal response to the technical comments provided. The comments are identified in **italics** and Ware Malcomb's responses are in **red**.

Completeness Review

A. Variance Application Checklist (§310-11-18D)

1. Submit the following documents with the Standard Development Application:

- a.** Copy of an area map showing all lots within 200' of the property. *The plan does not provide this information for the area in Edgewater Park Township east of Mount Holly Road or for the area in Willingboro Township south of US Route 130. The Applicant did not request a submission waiver for this checklist item. **As this appears to be a technical oversight, we have no objection to the Applicant providing this information in a future revision/submission as a condition of any Board approval.***

Response: The vicinity map, tax map, and zoning map on the Cover Sheet have been updated to include the Willingboro parcels within 200' of the subject property.

- b.** List of names, addresses, lot and block numbers, as they appear on the official tax records of the Township, of all owners of property within 200' of the property affected by the application and upon whom the notice must be served in the manner provided by law. *The plan does not provide this information for the area in Willingboro Township south of US Route 130. The Applicant did not request a submission waiver for this checklist item. **As this appears to be a technical oversight, we have no objection to the Applicant providing this information in a future revision/submission as a condition of any Board approval.***

Response: The vicinity map, tax map, and zoning map on the Cover Sheet have been updated to include the Willingboro parcels within 200' of the subject property.

- e.** Certification from Tax Assessor that taxes are paid. *The certification from the Tax Collector dated February 26, 2020 included with the Application packet indicates that there are \$301,112.21 in outstanding taxes and/or liens. The Applicant should address this.*

Response: A tax payment arrangement was executed with the township prior to the November 19 planning board meeting.

B. Preliminary Major Site Plan Checklist (§310-11-18B)

- 6.** The first sheet of a series of plats or plans submitted for preliminary approval shall contain, in addition to the above, the following:

 - b.** The names and addresses, lot and block numbers of all property owners within 200' of the tract boundary line including adjoining municipalities. *The plan does not provide this information for the area in Willingboro Township south of US Route 130. The Applicant did not request a sub- mission waiver for this checklist item. **As this appears to be a technical oversight, we have no objection to the Applicant providing this information in a future revision/submission as a condition of any Board approval.***

Response: The vicinity map, tax map, and zoning map on the Cover Sheet have been updated to include the Willingboro parcels within 200' of the subject property. The certified list of adjacent owners from the Willingboro tax accessor is provided on the Cover Sheet.

- c.** Signature blocks for the Board Chairperson, Board Secretary and Board Engineer. *The plan does not provide these features. The Applicant did not request a submission waiver for this checklist item. **As this appears to be a technical oversight, we have no objection to the Applicant providing these signature blocks on the Cover Sheet in a future revision/submission as a condition of any Board approval.***

Response: The required signature block has been added to the Cover Sheet.

- 9.** The location of existing watercourses and any natural features, including flood plains, wetlands, and soil types on the site and within 50'. *The plan does not provide these features nor did it include a statement that there are none within 50' of the property. The Applicant has not requested a waiver for this submission checklist item. **As this appears to be a technical oversight, have no objection to the Applicant providing this information, a***

statement stating there are no such identified features within 50' of the site, or both in a future revision/submission as a condition of any Board approval.

Response: There are no flood plains, wetlands, or existing watercourses within 50' of the subject property. Note 8 has been added to the Cover Sheet to address this comment.

12. Location of all structures within 200' of the property. *The plan does not provide this information for the area in Edgewater Park Township east of Mount Holly Road or for the area in Willingboro Township south of US Route 130. The Applicant did not request a submission waiver for this checklist item. We believe that it is important that this information, which can be obtained from aerial photo-grammetry, be provided on the Overall Site Plan (Sheet 4 of 25). As this appears to be a technical oversight, we have no objection to the Applicant providing this information in a future revision/submission as a condition of any Board approval.*

Response: The vicinity map on the Cover Sheet identifies structures within 200' of the subject property. Based on our discussions on November 24, 2020, we understand this to be sufficient for the application.

15. Tree save plan. *The plans indicate that the majority of the property's trees will be removed for the proposed development except those trees along the northern property line's landscape buffer and in the area west of the proposed US Route 130 driveway. The plan does not provide a plan to protect / save those trees. The Soil Erosion and Sediment Control Plans (Sheets 18-20) also provide for a silt fence to be provided in the landscape buffer area to protect adjacent offsite trees and vegetation. The Applicant has indicated this submission checklist item was not applicable and did not request a submission waiver for this checklist item. As this appears to be a technical oversight, we have no objection to the Applicant providing this information in a future revision/submission as a condition of any Board approval.*

Response: Tree protection fence is proposed along the disturbance limits within the property. The tree protection fence is shown on the Existing Conditions & Demolition Plan (Sheet 3), and Landscape Plans (Sheets 14-15). A construction detail for the Tree Protection Fence is provided on the Landscape Detail Sheet (Sheet 16).

16. A circulation plan showing proposed vehicle, bicycle and pedestrian circulation systems. The plan shall include the locations, typical cross-sections, centerline profiles and type of paving for all proposed new streets and paths. *The Applicant has not requested a waiver for this submission checklist item. The plan provides one internal crosswalk from the handicap-accessible parking space to the main building. The plan does not provide any sidewalks along US Route 130 or Mount Holly Road (CR 626).*

Response: The site plans have been revised to provide sidewalks along the right-of-way in areas of improvements. Additionally, a Circulation Plan depicting the largest vehicle movements is provided at the end of the site plan set.

23. All proposed buffers, landscaping, fences, walls, hedges or similar facilities. *The plan does not provide sufficient information about the proposed fencing, gates, trash enclosure, or other features. The Applicant did not request a submission waiver for this checklist item. As this appears to be a technical oversight, we recommend that the Board grant a temporary submission waiver on the condition that this information is included in a future revision/submission as a condition of any Board approval.*

Response: Pursuant to the request, gate details, fence details, and a trash enclosure detail have been added to the Construction Details (Sheets 23-27).

28. The Board may require the applicant to submit an environmental impact assessment as part of preliminary approval if, in the opinion of the Board, the development could have an adverse effect on the environment. *Historic aerial photographs show this area formerly contained an orchard. The submitted environmental impact statement (EIS) did not identify this feature or the property's former agricultural use. Also, the EIS did not identify the property's adjacency to a nursery / landscape business whose bulk materials, including mulches and soils, have been spilled / dumped onto the property. There is a strong probability that the property's soils may have been contaminated from the agricultural use of arsenic, lead, copper, and other metallic fungicides, herbicides, and pesticides before these chemicals were regulated. There is a possibility that contaminated mulches, soils, and other hazardous materials may have extended onto the property from the adjacent landscape business, as well*

Because the proposed soil disturbance on this property, including removal of errant landscaping materials, may adversely affect the public health, safety, and welfare, we recommend that the Board require the Applicant to amend the application to include the Phase 1 ESA with soil testing results. As the omission of this information appears to be a technical oversight, we recommend that the Board grant a temporary submission waiver on the condition that this information is included in a future revision/submission as a condition of any Board approval.

Response: A Phase 1 ESA for the property was provided the board professionals on November 19, 2020.

Recommendation:

We believe that the Applicant should revise the submitted plans to provide the information required in items # 12, 16, and 28 so that the Board, its professionals, local officials, and adjacent property owners, residents, and businesses may be able to adequately understand and evaluate the proposed development. **For this reason, we recommend that the Board find the application incomplete for its review and consideration of preliminary major site plan approval. Because the Applicant has not demonstrated that all its outstanding property tax balance has been paid, we recommend that the Board find the variance application incomplete for review and consideration, as well.**

Response: The application was deemed complete at the November 19, 2020 planning board meeting.

Zoning Review (C-3 Highway Commercial District)

A. Use Regulations: Because the proposed mini warehouse / self-storage use is not permitted in this district, the application will require a d(1) use variance.

In addition, we recommend that the Applicant provide the following testimony about the proposed use:

1. What days and times the facility will be accessible?

Response: The facility will operate seven days per week from 6:00 AM to 10:00 PM.

2. Whether there will be a resident manager(s) and apartment(s) as part of its operation? If so, whether the residential housing/apartment will be reserved for employee use.

Response: There will not be a resident manager living on-site.

3. What uses, if any, are anticipated for the undeveloped, westerly portion of the tract? Why is the existing foundation on this section to remain in place? Will there be outdoor storage of any materials or vehicles such as RVs, buses, boats, etc. at this location?

Response: At this time there are no plans to develop the westerly portion of the tract. Any future development plans for the westerly portion will seek approval from the planning board. The development has been designed to minimize land disturbance in areas unnecessary for the self-storage operation. The existing foundation is within the area of the property outside of the proposed area of improvements. Outdoor storage is not proposed as part of the application.

4. What restrictions, if any, will be included in leases and how they will be enforced? For example, will there be restrictions regarding using storage units as a distribution facility for a tenant's business?

Response: The self-storage development is designed to meet the specifications of national self-storage companies. The lease agreements will be in compliance with all state, local, and end user requirements, meaning no flammable liquids or perishable foods. A unit owner may store items within a unit but may not conduct business out of their unit.

5. Whether any of the storage units will be climate controlled? If so, the Applicant should consider providing a back-up electricity generator on the property.

Response: The units within Buildings A, D, and I will be climate controlled. The single story linear buildings will not contain climate controlled units. The applicant will consider a generator if it is a requirement of the potential end user.

B. Area and Bulk Requirements:

1. **The table indicates that a bulk variance may be required for the proposed 60' front yard set-back along US Route 130.** This is because §310-37-6 requires that "where extra width has been dedicated for widening of existing streets, lots shall begin at such new or proposed street line and all setbacks shall be measured from such line." We note that the plan does not provide for any ROW dedication to NJDOT along US Route 130.

If NJDOT were to require the Applicant to provide any additional ROW dedication as a condition of its approval, the proposed front yard setback, as well as the required 20' front yard landscape buffer, would be reduced accordingly, and the site plan may require other revisions. The Applicant should provide testimony on the status of its NJDOT approval. A front yard setback bulk variance and other bulk variances may be required.

Response: The development will require an access permit from NJDOT for the proposed driveways on Route 130 and Mount Holly Road. Based on the proposed traffic generation from this development, we do not anticipate the need for a deceleration or acceleration lane on Route 130. Therefore, we do not anticipate the need for additional right-of-way dedication.

2. **The table indicates that a bulk variance will be required for the proposed 50.6' front yard setback along Mount Holly Road where the minimum required setback is 60'.** We note that the 2019 Burlington County Highway Master Plan indicates that the future right of way (ROW) for Mount Holly Road, now 50'-wide, is planned for 100'. (See <https://www.dvrpc.org/webmaps/BCHMP/>).

If the Burlington County Planning Board were to require the Applicant to provide any additional ROW dedication, such as 25', as a condition of its approval, the proposed front yard setback, as well as the required 20' front yard landscape buffer, would be reduced accordingly, and the site plan may require other revisions. The Applicant should provide testimony on the status of its County approval as part of its front yard setback bulk variance testimony. Other bulk variances may be required.

Response: According to the NJDOT Jurisdiction Maps, Mount Holly Road is under NJDOT jurisdiction from the Route 130 driveway south. Based on preliminary conversations with the County and NJDOT, we do not expect additional widening to be required in the vicinity.

- 3. The table indicates that a bulk variance will be required for the proposed 10' side yard setback along adjacent Lots 2.01 and 4 where the minimum required setback is 30'.**

Response: The applicant has requested relief for the side yard setback.

C. Off-Street Parking

4. The ordinance lists self-storage facilities as a warehouse use in §310-15-18(6), §310-15-20A(2), and §310-15-21A(4). Based on §310-16-6B(6) and the 112,909 square feet of proposed floor area, 23 parking spaces would be required. The Applicant has requested a parking variance to reduce the required number of parking spaces to 15, which in its experience, is sufficient for a self-storage facility of this type and size. **A bulk variance is required. (See above for required c(1) or c(2) variance proofs.)**

5. **Response: The applicant has requested variance relief for number of parking stalls. The application proposes 15 parking spaces with an additional 8 spaces banked. The additional spaces are not required for the facility to operate.**

D. Fence and Landscape Buffer Waivers

6. §310-16-2F states fences shall not be permitted in a front yard in a non-residential district. *The Applicant has proposed a 6' high chain link fence in the front yard of the property along both the US Route 130 and Mount Holly Road (CR 626). The fence is continuous and secures the site. **A plan revision or design waiver is required.** We recommend all fences and gates visible in the front yards and visible from the street. The style of fencing proposed along the tract's US Route 130 and Mount Holly frontages should be labeled. We recommend an ornamental picket style fence, similar in style to that of SmartStop Self- Storage, which is consistent with the River Route / Route 130 Strategic Plan design policies. We recommend that the 6' high chain link fence proposed around the northerly perimeter be black, vinyl coated.*

Response: Pursuant to township request, the development proposes 6' white ornamental fence along front yards and 6' black vinyl coated chain link fence along the rear yard. Additionally, the fence along the residential property line will be equipped with black mesh screening. Labels have been added to the Site Plan identifying where each fence begins and ends. The application seeks a design waiver to permit a 6' high fence in the front yard.

7. §310-16-2H(2) states fences within 25' of any dedicated street line shall not exceed 4'. *The Applicant has proposed a 6' high chain link fence within 25' of dedicated street lines along US Route 130 and Mount Holly Road (CR 626). **The fence is continuous and secures the site. A plan revision or design waiver is required. (See comment above.)***

Response: The application seeks a design waiver to permit a 6' high fence in the front yard.

The fence is required for security.

8. §310-16-2H(3) states that 6' fences in the rear yard shall not be closer than 40' to a right-of-way. *The Applicant has proposed a 6' high chain link fence in the rear yard closer than 40' to the Mount Holly Road (CR 626) right-of-way. **The fence is continuous and secures the site. A plan revision or design waiver is required. (See comment above.)***

Response: The application seeks a design waiver to permit a 6' high fence in the front yard. The fence is required for security.

9. §310-16-7H(3) states that landscape buffer areas with landscaping shall be provided in all yards in the C-3 zones, and shall have minimum planting areas of 30' in the side yard (15' abutting non-residential uses), and 30' in the rear yard (15' abutting non-residential uses). *The Applicant has proposed a 10' landscape buffer in the side and rear yards instead of the 15' (side-yard non-residential) or 30' (rear-yard residential) required. The Applicant did not propose landscaping along three (3) side property lines abutting non-residential uses. **A plan revision or design waiver is required.***

Response: Pursuant to our discussions on November 24 and December 1, the plan has been revised to provide plantings along the Lot 2.01 common lot line where there is visibility from Route 130. Landscape plantings along Lot 4 are not proposed to ensure adequate drainage from overland stormwater originating from the upstream lot. The application seeks a design waiver to permit a 10' side yard and 15' rear yard landscape buffer.

General Comments

10. Vehicular Circulation: The Applicant should be prepared to provide testimony on the following:
- a. In addition to passenger vehicles, what types and sizes of trucks and vans will enter the site? If larger trucks, such as tractor trailers, will be included, truck turning templates should be depicted on the plan. We defer to the Township Fire Marshal regarding the adequacy of accessibility of fire equipment on the property.

Response: Testimony will be provided at the hearing identifying the typical vehicles that are expected at the site. The site has been designed to accommodate the equivalent of an SU-30 box truck. Additionally, we have met with the Fire Marshal and have provided a circulation plan depicting the fire truck's movements through the site.

- b. Will any of the access driveways or interior drives be restricted to one way? If so, traffic signage should be installed as appropriate.

Response: The driveway at Mount Holly will be exit only. A "Do Not Enter" sign has been added to the Site Plan (Sheet 6).

- c. Will NJDOT require bifurcated access on US Route 130?

Response: The driveway at US Route 130 has been revised to be bifurcated.

- d. How the loading area proposed for Building A will function if access to it is unrestricted? The type of truck/vehicle that is anticipated/permitted to access the interior loading area should be discussed.

Response: The loading area is designed to accommodate an SU-30 vehicle. The garage door will open via key card or code and the vehicle will be able to back into the interior loading space. This movement has been added to the Circulation Plan (Sheet 28).

11. Security and Access: The Applicant should be prepared to provide testimony on the following:

- a. Will the gate system be operated manually, automatically, or otherwise? Keypad or access cards should be discussed. If access is to be controlled, details should be shown on the plans.

Response: There are multiple storage companies interested in the project. Final site plans will incorporate tenant specific standards. We anticipate keycard, fobs, or code access at the gates.

- b. Whether the Mount Holly driveway is limited to one-way out, for emergency access only, or otherwise? The plan depicts "swing gates with lock". If this gate is limited to emergency access, the Applicant should coordinate with the Fire Marshal to ensure accessibility.

Response: The Mount Holly driveway is one way out. We will coordinate with the Fire Marshall to ensure the gate is accessible to emergency response vehicles.

- c. Which types of gates are proposed at which locations? Several gates are depicted on the plan, and details should be provided each type.

Response: All gates swing gates except for the gate at the northwest corner of the development, which is proposed as a slide gate. The gate types are identified on the Site Plan (Sheet 5-6) and details are provided on the Construction Details Sheet (Sheet 27).

- d. Will all storage unit tenants have access cards or if only the units outside the main building will have access codes?

Response: All units will have individual access via key card, fob, or access codes. A unit owner in Building A will have access to Building A only.

- e. Will there be other security measures, such as lighting, cameras, monitoring, accessibility, etc. on site? If so, the plans should be revised accordingly.

Response: Camera locations are indicated on the Architectural Plans.

11. Architectural Concerns:

- a. The Applicant should be prepared to provide testimony on the proposed building materials and colors will be used on the building's exteriors.

Response: The applicant acknowledges the comment. Testimony will be provided.

- b. It appears that the exterior facades of Buildings C, E, and J will be constructed with masonry block. If this is the case, we recommend that the fencing proposed along their length be eliminated and that the fence be integrated/terminated into the masonry wall at the building corners.

Response: Buildings C, E, and J will be constructed with a metal panel system. We have revised the fence alignment to end at the buildings.

- c. The Applicant should be prepared to provide testimony on the proposed building and business identification signage, including colors and materials. The Monument Sign included on Sheet 21 states "Tenant Here", so it is unclear if the property is going to be leased or owned.

Response: The final building mounted tenant signage will be sized and located as shown on the plans. Sign material, attachment, and illumination will be filed under separate permit.

- d. One of the architectural plan perspectives depicts roof-mounted solar panels while another plan does not. The Applicant should clarify its intent.

Response: Solar panels are not proposed at this time.

- e. The Applicant should be advised that all future architectural changes that impact the site plan features submitted, it may require amended site plan approval by the Board.

Response: The applicant acknowledges the comment. No response required.

Site Plan Comments

12. Sheet 2 – Zoning Compliance & Notes

- a. Sewer Demand Table references total water demand and should be revised to say "sewer."

Response: The revision has been made to the Sewer Demand table on Sheet 2.

- b. Design Waivers – the third section should be revised to eliminate one "16-."

Response: The revision has been made to the Design Waiver chart on Sheet 2.

13. Sheets 4-6 – Site Plan

- a. The van-accessible handicap spaces should be restriped to be 11' width and 5' aisles. This recommendation is an attempt to mitigate parking in the access aisle.

Response: The application proposes an 8' ADA space with an 8' aisle which is similar to the 11' space and 5' aisle requested.

- 1) The signpost and sign shall be moved into the parking space. A concrete-filled bollard with appropriate signage should be proposed in the parking space, adjacent to the curb. Details should be added to the plan set.

Response: The application proposes to install the sign behind the curb. Sign details are provided on the Construction Details Sheet (Sheet 23).

- b. A safe access should be provided to the outlet structure of each basin. It looks like someone may have to step down a foot onto the grate elevation of the Basin B outlet structure.

Response: The outlet structure will be built into the proposed wall. We have revised the proposed landscape to provide unrestricted access around the basin to access the outlet structures.

- c. The striping changes at the Mount Holly Road jug handle should be noted.

Response: There are no striping changes proposed in Mount Holly Road. Any striping adjustments will be reviewed and approved by the NJDOT.

- d. Bollards and striping should be added at the mechanical room door.

Response: The plan has been revised to include bollards and striping at the mechanical room door.

- e. A bollard should be added at each corner of a building adjacent to circulation aisles.

Response: The plan has been revised to include bollards at each building corner adjacent to circulation aisles.

- f. Text should be relocated so that it is not masking the fence graphic near the trash enclosure.

Response: The text has been relocated as requested.

- g. The parking spaces opposite the loading bays appear to conflict with truck maneuverability into/out of the loading area. Turning templates for a SU-30 should be provided to ensure no conflict with parking spaces.

Response: The SU-30 turning movement is provided on the Circulation Plan (Sheet 28).

- h. The size of the R1-1 (30" by 30") shall be added.

Response: The dimensions of the R1-1 sign is provided on Detail 21 on Sheet 23.

Grading & Drainage & Utilities

14. We recommend the following revisions to Sheets 7 & 8 – Grading & Drainage Plans:

- a. The scale is incorrect and should be updated.

Response: The scale has been revised to 1"=30'.

- b. There is an approximate 40% non-traversable grade in proximity to the Mount Holly Road driveway. The grading should be revised to a traversable grade or a guiderail should be provided. The guiderail should conform to current MASH standards.

Response: The plans have been revised to include guiderail along the traveled way adjacent to the proposed basin.

- c. Basin A is generally designed at the maximum traversable grade in proximity to the interior circulation aisles. As a result, no construction tolerances are afforded in the design.

Response: Comment acknowledged. As-builts of the basin will be provided to confirm the basin was constructed as designed.

- d. Retaining wall grades shall be reviewed and TW/GBW should be supplied at every grade or slope change. The ends of the retaining walls should be called out and include TW/GBW.

Response: Additional retaining wall grades have been provided around Basins A and B as requested.

- e. The contours along the shared property lines with the landscaping business should be reviewed and revised. The proposed contours are not matching with the existing contours.

Response: The contours along the property boundary have been revised accordingly as requested.

- f. There are 0.0% slopes denoted on the plan in the drive aisles that should be reviewed and revised. High / low / break points can be denoted with dashed lines rather than 0.0% slope.

Response: The 0.0% slope has been removed as requested.

- g. It looks like water is being directed to the rear of Buildings C and E.

Response: Grading along the common lot lines behind Buildings C and E have been revised. Drainage and swales are now proposed to convey stormwater from adjacent properties.

- h. It looks like water will be trapped behind Building J.

Response: Grading along the common lot line behind Building J has been revised. A drainage swale is proposed to convey stormwater from the adjacent property.

- i. The beginning and end inverts for the roof runoff collection system should be shown.

Response: Inverts for the roof leaders will be provided as a condition of approval.

- j. Cleanouts should be specified where the roof runoff collection system intersects a storm pipe if it is not at an inlet or manhole structure.

Response: Inserta Tees or an approved equivalent are proposed where roof leaders will discharge directly into a trench drain. along the common lot lines behind Buildings C and E have been revised. Drainage and swales are now proposed to convey stormwater from adjacent properties.

- k. The following connections look like it is flowing in the wrong direction.
1) SD-Inlet-206 pipe to SD-Inlet-202.

Response: The plan has been revised.

- 2) SD-Inlet-306 to SD-Inlet-303.

Response: The plan has been revised.

- l. The test pit and boring locations should be added to the plan.

Response: The test pit and boring locations will be added to the plan as a condition of approval.

- m. The designer should verify the outlet structures can be provided with a 6" plugged orifice at the basin bottoms. The manner of plugging should be specified; threaded cap, gate valve, slide gate, etc. This would facilitate non-mechanical dewatering if required. The outfall pipe invert elevation would have to be lowered, and the dewatering plug should be discussed in the O&M Manual as well, if this can be accommodated.

If the plugged orifice cannot be accommodated, an open Type A inlet (no grate) should be added to the bottom of each basin with an open 18" orifice just above (1-inch ±) the basin bottom elevation. The inlet can be tucked into the basin embankment. Add a concrete pad with an electric service plug at the top of basin. Coordinate with the Township Engineer for approval of the final locations for the inlets and concrete pads prior to finalizing the next submittal.

These would be required to facilitate mechanical dewatering in the event the basin needs to be drained. The inlet is required so that a pump can be placed without sucking sand from the bottom of the basin.

Response: The applicant agrees to work with the township professionals to provide a satisfactory maintenance program.

15. We recommend the following revisions to Sheets 21 - 24 – Construction Details:

- n. The basin access path detail should be added to the plan set.

Response: A basin access path detail has been added to Sheet 27.

- o. A storm cleanout detail should be added to the plan. A wye is preferred over a tee, and a flow direction arrow should be shown to aid the contractor and inspector to ensure the wye direction is installed properly.

Response: A storm cleanout detail has been added to the Construction Details Sheet.

- p. Sheet 21

- 1) Block Retaining Wall.

1. Expand the note to add that the retaining wall package should be signed and sealed by a registered, NJ-licensed engineer and be submitted to our office for review and approval prior to procurement of wall materials.

2. The retaining wall shows a guiderail, but no guiderail is noted on the site plan. Please clarify. If guiderail is to be provided, it must meet current MASH standards.

Response: The block retaining wall detail on Sheet 23 has been revised as requested.

- 2) Accessible Parking Sign and Striping. Graphically, the signs should be shown closer together.

Response: The detail has been revised as requested.

- 3) The stop bar detail should note thermoplastic material.

Response: The detail has been revised as requested.

- 4) A crosswalk striping detail should be added.

Response: The detail has added as requested.

- 5) Fire Lane Markings. The detail shows sidewalk, which conflicts with the plans. The color of the striping shall be added, and the location of the marking to be added to the plan.

Response: The detail has been revised as requested.

- 6) A sidewalk detail is shown, but no sidewalks are denoted on the site plan. Please clarify.

Response: Sidewalk is proposed in front of the office entrance and along the street frontages.

- d. Sheet 24 – Basin A Outlet Control Structure:

- 1) Ensure the number of orifices shown in the plate is reflected in the calculations.

Response: The calculations have been reviewed and the correct number of orifices are used in the calculations.

- 2) Ensure the number of orifices shown in the plate is reflected in the calculations.

Response: The calculations have been reviewed and the correct number of orifices are used in the calculations.

- e. Sheet 24 – the Trash Rack for Wet Pond OCS should be renamed since there are no wet ponds proposed.

Response: The detail has been revised as requested.

- f. Sheet 24 – a construction detail for the HDPE with Duraslot should be added. Minimum cover should be noted.

Response: The detail has been provided on Sheet 26 as requested.

- g. Sheet 24 – Basin Section Views:

- 1) Add a table for each Basin Section showing the Elevation, Area, and cumulative volume of each basin. The permeability rate and maximum expected drain down time for the 100- yr storm should be noted.

Response: The requested table has been provided on Sheet 26 as requested.

- 2) The emergency spillway elevation for Basin A does not match the Stormwater Report.

Response: The spillway elevation is 34.00. The calculations have been updated to match the

plans.

- 3) NJ BMP Manual section 9.5:
 - a) A sloped-sided trash rack as shown in the BMP manual is recommended in lieu of the flat, grate-type track proposed.
 - b) Page 11, for Infiltration Basins shows filter fabric on the sides of the K-5 sand layer. The sand layer with filter fabric along the sides, as applicable, should be added to the Basin Section View.
 - c) Forebays are recommended to be added to the infiltration basin to facilitate maintenance and further protect the infiltrative capacity of the basin.

Response: We agree to provide forebays to the satisfaction of the township engineer and soil district.

- 4) Add Basin Notes

Response: The requested notes have been added to Sheet 26.

Stormwater Management

16. Since the project disturbs more than 1.0 acre of land and results in greater than 0.25 acre net increase in impervious coverage, it is classified as a major project for the purposes of stormwater management and must comply with the requirements of NJAC 7:8. The project must meet the following requirements:

Response: Comment Acknowledged. No response required.

17. Design Criteria B1 references the regional rainfall data for Burlington County, but it looks like the rainfall data for Bergen County was used, which is the line above Burlington County. The designer should revise the calculations.

Response: The rainfall data utilized in design has been updated to reflect Burlington County.

18. Calculations for the water quality design storm should be included in the report.

Response: Routings for the water quality storm have been added to the report.

19. NJ BMP Manual section 9.5 for Infiltration basins states:

- a. The maximum design volume to be infiltrated is the volume generated by the Water Quality Design Storm.

Because the basins are infiltrating more than the water quality design storm, it is especially important that the Construction Requirements of the NJ Stormwater BMP Manual Section 9.5 be followed by the Contractor with a licensed engineer overseeing the work so that he (engineer) can provide a certification

that all stormwater items were installed according to best engineering/construction practices and manufacturer recommendations.

Response: Comment Acknowledged. No response required.

20. The Applicant should provide the name, address, and phone number of the responsible individual(s) who will be inspecting, performing maintenance, and repair of the stormwater management systems, at a minimum, upon construction initiation and conveyance to the receiving party (if property is sold).

21. §310-28-5B states that the minimum allowable pipe size is 15 inches yet there are pipes that are roof drains designed at 12 inches. A design waiver will be required. Our office takes no exception to the Board granting this waiver.

Response: We are formerly requesting a design waiver for roof leaders to be less than 15 inches in diameter.

22. Appendix D – Post-Development Water Quality Hydrologic Calculations

a. Appendix F shows test pit 6 K1 shows an infiltration rate is 5.28 in/hr., but the 7.52 in/hr. testing replicate was used. The slower of the tests for test pit 6 should be used in the drain time calculation.

Response: The chart in the Stormwater Report has been revised to reflect an infiltration rate of 5.28 in/hr. The basin will still drain within 72 hours.

23. Appendix G – Hydraulic Calculations

a. §310-28-5 includes the Manning's friction factors, such as "n = 0.015" should be utilized for RCP pipe calculations. The calculations in the report do not indicate what pipe material is used, and therefore, the friction factors cannot be reviewed.

1) This also affects the outfall pipes from the basin's outlet structures in the HydroCAD calculations.

Response: A manning's friction factor of 0.012 has been used for all HDPE pipe. We have used 0.015 for all concrete pipes, as reflected in the routings for the outlet control structure for the water quality storm have been added to the report.

24. Appendix H – Drainage Maps.

a. Offsite drainage that currently drains to the site should be accommodated/addressed in the design.

Response: Offsite drainage from Lots 2.01 and 4 has been accommodated in the revised report and maps.

25. Appendix I – Emergency Spillway Calculations.

Response: We agree to work with the township engineer and soil district to adequately design a stable emergency spillway. Spillway design will be addressed during our application for final site plan approval.

26. The Applicant should submit a stormwater maintenance report for review and approval. The report must be reviewed and approved by our office prior to signature of final plans. In addition, the Designated Inspectors List must be completed prior to signatures of the final site plan. This report should be provided in an oversized three-ring binder to the owner so that completed inspection logs can be easily added to the report.

Response: A stormwater maintenance plan will be provided with the application for final site plan approval.

Landscaping

27. The graphic scale depicted on the landscape plan indicates a ratio of 1"=50'; however, the true scale appears to be 1"=30'. The scale should be corrected.

Response: The scale has been revised.

28. The sight distance triangles should be added at each site access point and at the main internal access near the office to illustrate compliance with §310-16-2C, which states that fences shall not be in a sight triangle.

Response: Sight triangles have been added to the Landscaping Plan.

29. The mature height of the plants should be included. Of specific concern are the AM and JHBH shrubs.

Response: The mature height of the plants has been added to the Plant Schedule on Sheet 16.

30. A note that all sight triangles shall be maintained with planting trimmed to no higher than 36" or limbed to 7 feet.

Response: Landscape specification 12.G on Sheet 16 ensures compliance with §310-16-2C.

31. Evergreen trees such as Serbian Spruce (*Picea omorika*), 'Dragon lady' Holly (*Ilex x acquipermyi* 'Dragon lady' and *Cryptomeria japonica* 'Yoshino') should be incorporated into planting beds along the tracts US Route 130 and Mount Holly Road frontages.

Response: Pursuant to discussions with township professionals, we have revised the landscape design to include a variety of plantings outside of the proposed ornamental fence along Route 130 and Mount Holly Road.

32. A mix of evergreen and deciduous shrubs such as Sweetbay Magnolia (*Magnolia virginiana* (multi-trunk), 'Dynamite' Crape Myrtle (*Lagerstroemia indica* 'Dynamite') and Oak leaf Hydrangea (*Hydrangea quercifolia* 'Amethyst') should be incorporated into the planting beds described above to provide seasonal interest. The compact Inkberries proposed along the US Route 130 frontage should be reduced as appropriate and incorporated into the planting beds.

Response: Pursuant to discussions with township professionals, we have revised the landscape design to include a variety of plantings to provide seasonal interest.

33. The fence proposed along the US Route 130 frontage should be installed closer to the curb line fronting parking stalls to maximize planting area. All plants proposed along the US Route 130 frontage should be installed between the fence and highway. We recommend an ornamental picket fence be installed.

Response: Pursuant to discussions with township professionals, we have revised the landscape design to include a variety of plantings outside of the proposed ornamental fence along Route 130 and Mount Holly Road.

34. The fence proposed between improvements on the subject tract and lots 2.01 and 4 should be installed adjacent to the common property lines. We recommend that the resulting planting area be landscaped with a mix of naturalizing shrubs such as Red Twig Dogwood (*Cornus stolonifera* 'Arctic Fire'), 'Tiger Eyes' Sumac (*Rhus typhina* 'Tiger Eyes') and Bayberry (*Myrica pennsylvanica*) as well as ornamental grasses such as Feather Reed Grass (*Calamagrostis x acutifolia* 'Karl Foerster') and Switchgrass (*Panicum virgatum*).

Response: Pursuant to discussions with township professionals, we have relocated the fence closer to the curb line and ended the fence at the buildings. Additional plantings along Lot 2.01 have been added to the landscape design. The remaining areas adjacent to Lot 4 will have switch grass installed because of the anticipation of stormwater from the adjacent lot and restricted access for maintenance.

35. The symbols depicted in the planting beds proposed around the monument sign and the ends of Building B are indistinct and should be modified for clarity.

Response: The Landscape Plan has been revised as requested.

36. We recommend replacing the *Aronia melanocarpa* proposed around the base of the monument sign with a more refined shrub such as St. Johnswort (*Hypericum x 'Hidcote'*).

Response: The Landscape Plan has been revised as requested.

37. The Pennsylvania Sedge proposed near the monument sign prefers part shade to shady conditions. We recommend that it be replaced with an ornamental grass more suited to the exposed condition such as 'Fountain Grass' (*Pennisetum alopecuroides* 'Hamelin').

Response: The Landscape Plan has been revised as requested.

38. We recommend replacing the Red Maple proposed in the planting area located at the southerly end of Building B with an evergreen tree such as Serbian Spruce (*Picea abies*). The shrubs proposed should be replaced with a mix that includes species such as Gold Mound Spirea, 'Merlot' Sweetspire and 'Otto Luyken' Cherry Laurel.

Response: The Landscape Plan has been revised as requested.

39. Shade trees such as 'Princeton' Elm (*Ulmus americana* 'Princeton') should be planted along the seeded area proposed behind Building B. Shrubs such as Witchhazel (*Hamamelis mollis*) should be planted in mulched beds between the shade trees and be supplemented with shrubs such as

Heavenly Bamboo (*Nandina domestica*), 'Blue Boy' Holly (*Ilex meserveae* 'Blue Boy') and 'Blue Girl' Holly (*Ilex meserveae* 'Blue Girl') and ornamental grass such as Feather Reed Grass.

Response: The Landscape Plan has been revised as requested.

40. The buffer proposed between infiltration basins A and B and the property line bordering the R-3 residential district appears to be less than 15' wide for much of its length and as little as 10' along the west side of basin A and bordering the sanitary sewer easement running along the northeasterly corner of the tract. Both widths are insufficient to provide effective screening. A double row of evergreen trees is proposed in the affected areas however the spacing will not provide sufficient room for growth, health and vigor.

Response: The initial landscape design followed the ordinance requirement of 5 foot spacing. We agree this spacing is not sufficient. The Landscape Plan has been revised as requested. Pursuant to our discussions, the landscape buffer design at the rear of the site has been modified so that the fence is now at the top of the basin wall and a variety of plantings are proposed between the fence and property line. We believe this design will provide a more effective screen for the existing residences as required in the ordinance. Additionally, we have eliminated the proposed landscaping behind Basin B and to the west of Basin A to provide access to the outlet control structure.

41. We recommend the buffer bordering basin B be expanded south into the undeveloped portion of the tract to provide the 30' width required by ordinance and that they be expanded to a minimum of 20' in developed areas. We recommend that the applicant's professionals meet with this office to develop an effective buffer.

Response: The Landscape Plan has been revised pursuant to our discussions on November 24 and December 1.

42. Where the buffer area width expands behind building A the planting area should be expanded accordingly to provide additional room for plant development.

Response: The Landscape Plan has been revised as requested.

43. The White Pines proposed in the buffer separating the subject tract from residential areas should be re- placed because of their tendency suffer limb damage from wind and snow loads. We recommend adding other broad, evergreen species such as Norway Spruce (*Picea abies*) and White Fir (*Abies concolor*) into the planting scheme as well as more narrow species such as 'Green Giant' Arborvitae and 'Emerald Senti- nel' Red Cedar (*Juniperus virginiana* 'Emerald Sentinel').

Response: Pursuant to our discussions, the landscape buffer design at the rear of the site has been modified so that the fence is now at the top of the basin wall and a variety of plantings are proposed between the fence and property line. We believe this design will provide a more effective screen for the residences as required in the ordinance.

44. The evergreen tree species proposed in the buffer cited above should be interspersed with each other to provide a more natural appearance and mitigate potential disease spread.

Response: The Landscape Plan has been revised pursuant to our discussions on November 24 and December 1.

45. We recommend that large shade trees such as Tuliptree (*Liriodendron tulipifera*), American Sycamore (*Platanus occidentalis*) and Dawn Redwood (*Metasequoia glyptostroboides*) as well as understory trees/shrubs such as Witchhazel (*Hamamelis mollis*), Redbud (*Cercis canadensis*), Spice bush (*Lindera benzoin*) and Heritage' Birch be interspersed among the evergreen trees proposed within the buffers de- scribed above.

Response: The Landscape Plan has been revised as requested.

46. We recommend that a mix of 2" Switchgrass (*Panicum virgatum*) plugs be planted between the rear of buildings F and H and basin retaining walls to eliminate the need for mowing and simplify maintenance.

Response: Since the client will need to perform regular maintenance for the basins and the plantings that line the rear property line, they will also perform maintenance to the lawn areas behind Buildings F and H. Plugs have been provided behind Buildings E and J where regular maintenance access is more limited.

47. We recommend that a drip irrigation system be installed along the US Route 130 planting areas to supply supplemental water during dry periods and enhance plant vigor and growth.

Response: Comment acknowledged. The applicant is amenable to this request.

Lighting

48. Light spills onto Mount Holly Road and the diner site. Cutoff lights should be specified to control this.

Response: The lighting design has been revised to eliminate spill over onto Lot 2.01.

49. The Area Light Detail has a note that says, "Not for Construction." An appropriate construction detail should be added to the plan.

Response: The detail has been revised as requested.

Miscellaneous

48. We recommended that the Board condition any approval to require Title 39 certification for the site.

Response: Comment Acknowledged. No response required.

49. We reserve the right to make additional comments as more information becomes available.

Response: Comment Acknowledged. No response required.

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BRANDING
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50. The Applicant should provide our office with electronic copies of all approvals once they are received.

Response: Comment Acknowledged. No response required.

Should you have any questions on any aspect of this project, please do not hesitate to contact me via telephone at 848.999.3987 or email at ewilkes@waremalcomb.com.

Sincerely,

Ware Malcomb



Edward Wilkes Jr., PE
Civil Engineering Manager

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