

Harbor Consultants Inc.
Engineers, Planners & Surveyors

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September 5, 2019
Revised October 9, 2019

Mr. George A. Castro, II, Chairman
Commissioners & Members
City of Elizabeth Zoning Board of Adjustment
50 Winfield Scott Plaza
Elizabeth, NJ 07201

Re: Spring Street Development Corp.
703 & R 703-727 Spring Street
Application No. Z-05-19
City of Elizabeth, NJ

Dear Chairman & Members of the Board:

Our office is in receipt of an application by Spring Street Development Corp. for a use variance with preliminary and final site plan and bulk variances approval for the subject property located at 703 and Rear 703-727 Spring Street (Routes 1&9) and contains a total of 4.67 acres. The property has a flag lot configuration with access to Spring Street by way of two driveways. The existing strip mall on the adjoining property to the west separates the subject property from Spring Street. The property presently contains multiple commercial buildings with a total square footage of approximately 64,000 square feet. The application indicates that the property has been previously utilized for auto auction sales. The existing buildings may contain other businesses, however they are not identified on the plans.

Based on a site inspection of the property, it was found to have numerous cargo vans parked throughout the property. The vans were identified as Amazon Prime, Enterprise Rental, Budget Rental, U-Haul Rental and vans with no markings. This office is not aware of any previous approvals to allow for the use of the property for parking, storage or rental of vehicles.

The proposed use for the site is for logistics operations by Amazon Logistics. The specifics of the operations is not clear, however it appears that the site will be used for storage of delivery vans to be picked-up in the morning and returned at the end of the business day. The drivers will leave their personal vehicles at the site. It is also not clear if the existing business are to remain and the type of business currently occupying the site are not indicated. The plans indicate that approximately 28,000 square feet of the existing building will be removed, leaving a remainder of approximately 36,000 square feet. Based on our site inspection the building has already been removed. The area is proposed to paved and converted to parking.

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The Applicant has included Lot 1299-4, 729-763 Meadow Street, to the Application, which is a vacant 3.64 acre parcel at the corner of Spring Street and North Avenue. The Applicant is proposing a 28' access drive to North Avenue and is proposing to re-grade the site and install a 3" thick gravel surface. It is not clear if this parcel will be used for any purpose other than the access drive. This property received site plan approval from the Planning Board on 01/08/09 for two hotel buildings, Application No. P-22-07. Also, the existing buildings to remain, containing approximately 14,100 square feet, will be used for indoor parking and will contain 38 spaces.

We have reviewed the plan and application and we offer the following comments:

Zoning Comments:

1. The subject property is located in the HC Highway Commercial Zone and the MRC Manufacturing, Research & Commercial Zone. The majority of the property is located in the MRC Zone. Logistics operations are not a permitted use in either zone, therefore a use variance is being requested.
2. The Applicant shall provide testimony with respect to the current use of the property and any approvals to allow for the current uses.
3. The following bulk variances are being requested:

HC Highway Commercial Zone:

- a. The required lot width is 100', whereas 11.35' is proposed.
- b. The minimum required open space is 20%, whereas 0% is proposed.
- c. The maximum permitted impervious coverage is 80%, whereas 100% is proposed.
- d. The minimum required lot area is 10,000 square feet, whereas 7,091 square feet is proposed.

MRC Manufacturing, Research & Commercial Zone:

- a. The required lot frontage is 150', whereas 37.56' is proposed.
 - b. The maximum permitted impervious coverage is 75%, whereas 95.96% is proposed.
4. The following additional variance is required: under Section 17.36.110.G.1 of the City Code the minimum Floor Area Ratio (FAR) is 11%, whereas a FAR of 0% is proposed for Lot 1299-4, 729-763 Meadow Street.
 5. It is no clear if the two properties are to be consolidated. An access driveway is not a permitted principal use on Lot 1299-4. An additional use d.1 variance may be required. No other uses shall be conducted on Lot 1299-4 without additional Board approval.

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6. The following design waivers are required:
 - a. Under Section 17.32.060.C.3 of the City Code, the required setback from a parking area to a side or rear property line is 3', whereas 0' is proposed.
 - b. Under Section 17.32.D of the City Code, a ten foot safety island is required between the end of a parking bay and any driveway aisle, whereas no safety islands are proposed.

General Comments:

1. The applicant shall provide testimony in support of each variance being requested.
2. The Applicant shall provide testimony as to the operation of the proposed facility, including hours of operation, number of employees, etc.
3. A survey prepared by a licensed land surveyor shall be provided.
4. Landscaping is proposed consisting of 22 Abortive evergreens and 8 Boxwood shrubs. The Applicant has added screening along the perimeter of Lot 1299-4 and has indicated that due to the environmental cap required for the site, additional landscaping is not feasible. However, the Applicant should look into above grade planters to provide additional on-site landscaping.
5. The Applicants response letter, dated 9/26/19, to our previous review letter indicates that no sign s are proposed. Any new signage shall comply with the City Code or the Applicant will be required to return to the Board for additional variances.
6. The Applicants response letter indicates that the purpose of the river stone along the perimeter of the parking area is to create a maintenance free pervious area. The Applicant shall provide testimony s to why this area cannot be landscaped.
7. The Remedial Capping Plan indicates areas of concern (AOC), containing Chromium and PCB's. The remedial work will be performed under the direction of an LSRP in accordance with NJDEP rules and regulations.
8. The existing building is in poor condition. It is recommended that the Applicant propose repairs and alterations to make the building more aesthetically pleasing.
9. See attached memorandum prepared by HCI, dated 10/9/19 for stormwater management comments.
10. A stormwater management plan and lighting plan is required for Lot 1299-4.

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11. See attached letter from Hamal Associates, dated October 8, 2019, for traffic comments. Comments provided raise concerns that the proposed project will have a negative impact on the surrounding area. Based on our inspection of the site, there are a large number of cargo vans that are parked in an unorganized configuration.
12. Parking is based on lot area in the MRC Zone, however in the case of a use variance request the Applicant must provide sufficient proof that adequate parking is being provided for all uses on the property. The Applicant has indicated that the number of vans to be stored onsite will be approximately 200 and there will be 150-175 delivery employees.
13. The site shall meet the requirements of the American with Disabilities Act and the New Jersey Barrier Free Code.
14. The Applicant shall comply with all directives of the City of Elizabeth Fire Official.
15. The Applicant shall comply with the comments of the City Engineer, dated 5/13/19 and 10/01/19.
16. The applicant shall file with the Board and Construction Official copies of all necessary agency approvals other than municipal agencies having land use jurisdiction over the application.
17. Prior to issuance of building permits, compliance with all conditions of approval indicated in the resolution shall be verified by the Board Engineer.
18. Subsequent to resolution compliance, an electronic copy of the approved drawings shall be provided to the Board Engineer. The file format may be AutoCAD, PDF, JPEG, or TIF.
19. The Applicant shall arrange a pre-construction meeting with the Board Engineer and Construction Official at least one week prior to start of construction.
20. An engineers estimate for site improvements must be submitted prior to signature by the Board Chairperson.
21. The Applicant must post performance guarantees and inspection fees with the City of Elizabeth prior to beginning of any on-site construction activities.

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Regulatory Approvals:

The applicant shall file with the Board and Construction Official copies of all necessary agency approvals other than municipal agencies having land use jurisdiction over the application.

1. The following additional approvals may be required
 - a. Union County Planning Board.
 - b. Somerset - Union County Soil Conservation District.
 - c. City Fire Official.
 - d. City Board of Health.
 - e. City Utility Connection & Road Opening Permits.
 - f. All other permits as required by agencies having jurisdiction over project.
2. It is the applicants responsibility to secure all required permits and approvals.

Documents Reviewed:

1. Plans entitled “Preliminary and Final Site Plan, 703-727 Spring Street Capping Plan, Tenant: Amazon Logistics, 703-727 Spring Street, City of Elizabeth, Union county, New Jersey, Block 8. Lot 1699.D”, prepared by Jarmel Kizel Architects and Engineers Inc., last revised 9/26/19, consisting of 9 sheets.
2. Plans entitled “Spring Street Development Corp. Remedial Capping Plan, Prepared for The Elm Group, December 2018, Block 8, Lots 1699.D, City of Elizabeth, Union County, New Jersey”, prepared by The Elm Group, last revised 1/30/19, consisting of 8 sheets.
3. Report entitled “Spring Street Development Corporation, Former Metal Powder and Chemical Works Site, Block 8, Lot 16899.D, 703-727 Spring Street, Elizabeth, New Jersey, Site and Stormwater Management Analysis, Prepared For:, The ELM Group, Inc., Prepared By: Frey Engineering, LLC”, last revised 01/28/19.
4. Letter dated 9/26/19 from Jarmel Kizel Architects and Engineers Inc. to City of Elizabeth Zoning Board, in response to HCI letter dated 9/5/19.
5. Letter from Langan dated 9/26/19 to City of Elizabeth Zoning Board, in response traffic comments by Hamal Associates, dated 9/4/19.

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The above comments presented in this letter are for the consideration of the Board Members, the Applicant and the Applicants Engineer. If questions arise from these parties, please contact this office for further discussion.

Very truly yours,



Anthony G. Gallerano, PE, PP
Harbor Consultants, Inc.

TECHNICAL REVIEW LETTER

**Re: Spring Street Development Corp.
703 & R 703-727 Spring Street
Application No. Z-05-19
City of Elizabeth, NJ**

File No: Z-05-19

By: Jose M. Betances, PE, PP, MCE

**Date: September 6, 2019
Revised October 9, 2019**

Based on the review of the site plans entitled “Preliminary and Final Site Plan, 703-727 Spring Street Capping Plan, Tenant: Amazon Logistics, 703-727 Spring Street, City of Elizabeth, Union county, New Jersey, Block 8. Lot 1699.D”, prepared by Jarmel Kizel Architects and Engineless Inc., dated 2/21/19, last revised 9/26/19”; the site plans entitled “Spring Street Development Corp. Remedial Capping Plan, Prepared for The Elm Group, December 2018, Block 8, Lots 1699.D, City of Elizabeth, Union County, New Jersey”, prepared by The Elm Group, last revised 1/30/19; and the Stormwater Management Analysis, Prepared For:, The ELM Group, Inc., Prepared By: Frey Engineering, LLC”, dated 8/4/17, last revised 01/28/19, the following comments should be addressed:

1. Section II.b. - Preliminary Site Investigation of the Stormwater Management report, refers to a topographic survey provided by Barry Isett and Associates, dated June 2015 that has not been submitted. Copy of the survey should be provided. **Not Addressed.**
2. Section II.f. - Preliminary Site Investigation of the Stormwater Management report indicates that the current revisions are based upon a compilation of revisions from the SSDC Consultants, dated 11/30/18. However, these revisions have not been submitted. The compilation of revisions should be provided. **Not addressed.**
3. A boundary and topographic survey reflecting the current site conditions should be submitted. **Not addressed.**
4. The inlets and manholes located along the south property line should include the storm sewer pipes. **Not addressed.**

5. All storm sewer pipes, materials, sizes, inverts, lengths and slopes should be shown for both the existing and proposed storm sewer system, including the offsite drainage system. The grading & drainage plan, and the existing conditions plan should be revised accordingly. **Not addressed.**
6. Based on the information provided in the stormwater management report, runoff from most of the site is tributary to the drainage system on Woodruff Lane. The existing conditions plan, and the grading & drainage plan should be expended to include Woodruff Lane and all relevant information. **Not addressed.**
7. No information has been provided for the existing drainage system downstream of proposed discharge points. The offsite downstream drainage systems should be added to the existing conditions and grading & drainage plans. All existing and proposed underground utilities and drainage system on Spring Street, Woodruff Lane and on site should be clearly shown on plans. **Not addressed.**
8. The drainage report incorrectly combines the peak runoff rates for the different discharge points. In order to demonstrate compliance with the stormwater quantity control requirements at N.J.A.C 7:8-5, the applicant must demonstrate that the requirements are met separately for each discharge point. The calculations should be revised accordingly. **Not adequately addresses.**
9. The required peak flow reductions should be based on the allowable peak flows from the predevelopment calculations. Table 5 and the calculations should be revised accordingly. **Not addressed.**
10. The storm drainage calculations for the 2, 10, 25 and 100-year storms should be based on the rainfall amounts of 3.39, 5.17, 6.42 and 8.69 as per the latest New Jersey 24 hours rainfall frequency data from NRCS. The calculations should be revised accordingly. **Not addressed.**
11. The existing site coverage conditions Table should be added to the stormwater management report. Only the proposed site coverage conditions (table 4) has been provided. **Not addressed.**
12. Spot elevations should be added within the existing barrier located near the north property line to verify drainage areas OS-2 and E-4. **Not addressed.**
13. The conditions of the existing PVC drainage pipes are unknown. The 'n' value used for the existing pipe listing shown on page 5 of the Hydro CAD report should be 0.013. **Not addressed.**
14. A Manning's roughness coefficient 'n' of 0.012 should be used for all proposed HDPE pipes. The stormwater calculations should be revised accordingly. **Partially addressed. The use of 0.013 is acceptable, however 0.010 has also been utilized. The calculation should be revised accordingly.**
15. The Hydro CAD diagrams for the existing and proposed pipe listing should be added to the stormwater management report. **Not addressed.**

16. The drainage calculations should be revised to include a diagram or plan showing the tributary drainage areas to each pond. The ponds should also be included. All existing and proposed routing diagrams should be added to the stormwater management report. **Not addressed.**
17. Additional spot elevations and contours should be provided offsite around the site to properly evaluate the existing and proposed discharge points of analysis. **Not addressed.**
18. The minimum time of concentration used in the hydrograph calculations should be 10 minutes. **Not addressed.**
19. All water quality peak flows calculations are 0.00 cfs. The NJDEP cumulative and incremental rainfall distribution for the water quality storm should be used. The water quality rainfall distribution should be added to the report. **Not addressed.**
20. The required TSS removal rate should be included in the drainage calculations. **Not addressed.**
21. Existing and proposed land cover drainage area maps should be added to the stormwater management report. The maps should clearly delineate the impervious and pervious areas. **Not addressed.**
22. The drainage area OS-4 shown on the drainage report doesn't match with the drainage area on the pre-drainage area map. The drainage calculations and drainage plan should be revised accordingly. **Not addressed.**
23. Based on the information shown on the existing conditions plan, it appears that portion of existing drainage area O-3 is tributary to drainage area E-6. Additional spot elevations should be added in order to verify the drainage areas limits. **Not addressed.**
24. Clarify why the existing storm sewer pipes and structures have been used as detention basins in the hydrologic calculations. **Additional clarification is required.**
25. The peak flows for the 25-year storm conduits calculations should be provided using the Rational Method. In addition, a report should be added in DOT format (inv., elev., depth of flow, HGL, EGL, design velocity, cover, etc.) by using hydrograph software or equivalent. The report should also include the pipe profiles with the EGL & HGL shown. **Not addressed.**
26. The inlet drainage plan should be added to the drainage report. **Not addressed.**
27. The pre-development and post-development drainage areas plans should clearly delineate the drainage areas and each point of discharge. **Partially addressed. Additional clarification is needed with respect to delineation of drainage areas.**
28. The information used for the outlet devices of Ponds 1S, 2S., 3S, 4S and 5S, I4 on the drainage report have not been shown on the plans. It is not clear how this information was obtained. The plans and report should be revised accordingly. **Not addressed.**

29. The information of the outlet devices of Pond I1 and I5 on the drainage report don't match with the existing conditions plan. The plans and drainage report should be revised for consistency. **Not addressed.**
30. Existing inlet I-2 shows a portion of a 6" PVC inflow pipe. Additional information is required concerning the 6" PVC and possible additional tributary drainage area. **Not addressed.**
31. Clarify if the secondary devices shown on the Summary Ponds for the existing conditions calculations are in accordance with the existing inlets grates on the property. **Not adequately addressed.**
32. The hydrologic calculations have been performed using smaller sub-catchment areas that are tributary to the same point of analysis (i.e. existing drainage areas E-1 thru E-7 are tributary to the existing drainage system living the property at the southwest corner of the site. To facilitate the review, a section should be added to the drainage report describing each drainage area in detail, including the land cover and discharge point of analysis. **Continuing comment. This response is relative to Comment 47.**
33. The ladder rung detail for the sanitary and storm structures should be provided. **Addressed.**
34. Details should be provided for all proposed monument and wall mounted signs. **Addressed. Applicant states that no signage is proposed.**
35. The location of proposed trash/enclosure should be added to the plans. **The Applicant states that no trash enclosure is proposed.**
36. A note should be added to the plans indicating that all improvements are to be made in compliance with 2010 ADA Standards, etc al. **Addressed.**
37. Provide a note on the plans indicating that all traffic signage and stripping shall be in accordance with the latest edition of MUTCD. **Addressed.**
38. The line of sight distances shall be depicted on the site plans in accordance with the current edition of AASHTO's policy on geometric design of highways and streets. **Not addressed.**
39. The applicant should provide a truck & vehicle turning circulation exhibits to verify that the on-site circulation is adequate for the required service and emergency vehicles access throughout the site. **Not addressed.**
40. The location of no parking zones for firefighting operations should be provided, including the construction details. **Not addressed.**
41. The limits of proposed pavement restoration, curbs and restriping along public roads should be shown on the plans. **Addressed.**
42. Approval should be obtained from the Fire Official regarding the required fire lanes, markings, signage, striping and access for fire apparatus. **Not addressed.**

43. Calculations should be submitted to demonstrate that the existing waterline is suitable for the proposed domestic and fire flow volumes and pressures. **Addressed.**
44. Provide domestic and fire flow water distribution system calculations. A minimum of 20 psi of residual pressure should be available for firefighting. Hydrants flow testing results should be submitted to confirm available fire flow (AFF). **Not addressed.**
45. Sanitary sewer and water demand calculations should be provided for the proposed project. **Not addressed.**
46. Concrete encasement should be provided for all utility crossings of less than 18". The location of all proposed utility crossings and concrete encasements should be shown on the plans and profiles. The applicant should provide a table format for water mains/utility crossings, including lateral crossings, with corresponding clearances to reflect the avoidance of conflicts with other underground utilities. **Not addressed.**
47. The utility crossing detail should be added to the plans. A note should also be included indicating that water mains crossing storm sewers or drains where the clearance between the pipes is less than eighteen inches (18"), pier supports for the storm sewer shall be provided in order to prevent the load transfer to the affected utility. Partially addressed. **The note needs to be added,**
48. A note should be added to the plans indicating that all constructions shall comply with the current rules and regulations or ordinances of the City of Elizabeth, NJDEP and all applicable regulatory agencies having jurisdiction. **Addressed.**
49. A note should be added to the plans indicating that any existing curbs or other objects damaged during construction shall be repaired or replaced to the satisfaction of the City Engineer and NJDOT if required. **Addressed.**
50. The utility pole to remain shown on Sheet C-300 located along the edge of the driveway, near the no parking loading zone striping, should be relocated to the south of the striping space. **The Applicant has indicated that the striping has been added but it does appear to have been added to the plans.**
51. Additional dimensions should be added on Sheet C-300 for handicap parking spaces, accessible aisles, striping spaces, loading ramp, the two-way and one-way driveways and curb cuts on Spring Street and curb radii. **Partially addressed. Additional dimensions should be added.**
52. Spot elevations should be added to all proposed handicap parking spaces, ramps and landing areas to verify conformance with ADA requirements. **Not addressed.**
53. In order to facilitate the review of the proposed grading, the grading plan should include slopes with arrows within the overall area. **Not addressed.**
54. Less than 1% slope has been proposed within a portion of the proposed parking area. The

grading should be revised to provide paved area with a minimum of 1.5% to avoid ponding.
Not addressed.

55. Are new fences and gates proposed? **Addressed.**
56. Clarify if new water and gas lines will be required. **Addressed.**
57. The location of existing gas meters, water meters and vaults should be shown on the plans.
Not addressed.
58. The demolition plan C-200 indicates that the existing electric supply area will be modified, while C-300 indicates to remain. The plans should be revised to include the proposed modifications. **Addressed.**
59. No directional signages have been provided. All proposed signs, striping and pavement markings should be provided, including but not limited to stop signs, stop bars, one-way, ingress & egress, no parking, do not enter, fire lane, handicap, etc. The construction details should also be provided. **Partially addressed. Additional signs and pavement markings should added to plans.**
60. The existing contours on Sheet C-400 should be shown on halftone dashed line. **Addressed.**
61. In order to properly review the grading plan, the proposed site conditions should be shown on the Grading and Drainage plan sheet C-3. **Not addressed.**
62. Verify that the proposed lighting plan complies with the requirements of the City of Elizabeth. The illumination requirements from the City of Elizabeth should be added to the plan. **Not addressed.**
63. The drainage report should be revised to provide emergency spillway calculations for the proposed subsurface detention systems. The emergency spillway analysis should be based on the 100-year basin inflow runoff and assuming that the principal spillway is malfunctioning and will not allow any discharge or flow. **Not addressed.**
64. The Stormwater Operations and Maintenance Manual (O&M) should be prepared and submitted for review in accordance with the New Jersey BMP Manual. These documents would be required to be attached to the deed as a rider. **Not addressed.**
65. The cold in place recycle pavement section detail on Sheet C-4 should be revised to include the thickness of the base course. **Addressed.**
66. The subbase course of the standard full depth asphalt pavement section detail on Sheet C-4 should be 6". **Addressed.**
67. The proposed manhole cover detail should include the year. **Addressed.**

68. Additional details should be provided for the proposed Retain it detention basin and outlet control structure. **Not addressed.**
69. The proposed Retain it detention basin consists of structures with open bottom and 6” stone base. It appears that stormwater will be infiltrated. Soil test in accordance with NJDEP BMP manual should be submitted. Partially addressed. **A detail of the membrane should be provided.**
70. Due to the potential for groundwater contamination, the use of infiltration basins is prohibited in areas of high pollutant or sediment loading is anticipated. Clarification is required concerning the contaminated areas. **Addressed.**
71. The roof leader should be connected to the underground drainage system. The roof leader collection system and cleanouts should be shown on the grading and drainage plan. The cleanout riser cover detail should also be added to the plans. **Partially addressed. Only the storm cleanout detail was provided.**
72. The applicant submitted two separate sets of site plans for the project. many of the information and details that are repeated on both sets of plans are different, i.e. existing topography, Soil Erosion Control Plan, construction details, proposed grading, missing information, etc. The site plans should be combined into one single set of plans. Only the drainage plans should be separated and included in the Stormwater Management Report. **Partially addressed. The plans still show duplicate details.**
73. The Applicant shall comply with the comments of the City Engineer, dated May 13, 2019 and October 1, 2019. **Not addressed.**
74. Additional comments may be presented pending receipt of the revised plans and reports. Please submit 3 copies of revised plans and reports along with a point by point response Letter. The response letter shall address all comments and should include the location of the revised items.

Hamal Associates, Inc.

Traffic and Transportation Consulting

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19 Porter Road

West Orange, New Jersey 07052

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N.J. CERT. OF AUTH. NO. 24GA27922200

October 8, 2019

Mr. Anthony Gallerano, PE
Harbor Consultants, Inc.
320 North Avenue East
Cranford, NJ 07016

Re: Traffic Review #2
Spring Street Development Corp.
Amazon Logistics Delivery Service Facility
703-727 Spring St (US Rt. 1 & 9)
729-763 Meadow Street
Block 8, Lots 1699.D, 1299.A
City of Elizabeth, Union Co., NJ

Dear Mr. Gallerano:

At your request on behalf of the Elizabeth Board of Adjustment, the firm of Hamal Associates, Inc. (HMA) has conducted a traffic review of the application documents (submitted Sept. 27, 2019), the site plans (dated Revised Sept. 26, 2019) prepared by Jarmel Kizel (JK), and a Traffic Review Response letter prepared by Langan Engineering & Environmental Services (LGN – dated Sept. 26, 2019) for the above referenced project. This is our second traffic review of this application.

We have hereinafter provided our original September 4, 2019 traffic review comments, as well as several additional traffic comments. Our current review comments, to the submitted Sept. 26, 2019 LGN traffic response letter, are noted in **Bold** type.

The site is located to the east of US Route 1 & 9 northbound (NB-Spring St) and between, but not fronting on, North Avenue East and Woodruff Lane, in the City of Elizabeth, NJ. The site has access through two (2) drive connections to US Route 1 & 9 NB, but has no other frontage on any roadways, being bounded on all sides by other commercial properties and a State maintenance yard. Immediately west of the site is a retail store located on Block 8, Lot 1699.C, which has frontage on Rt. 1 & 9 NB. This latter lot shares access to/from Rt. 1 & 9 NB with the Applicant's previously noted highway drives. The current use of the site is for auto related services, such as vehicle sales, servicing and washing and a logistics center.

The application proposal is to lease the site to Amazon Logistics (AL) who will provide service fulfillment of customer orders. As discussed in the application documents, the proposed use involves the 'last mile' of the customer delivery phase. In the early am hours, AL associates will arrive in personal vehicles to the site to pick up their delivery vans. After completion of their deliveries (packages loaded at another off-site location), the vans will return to this site and AL associates leave in their own vehicles.

Hamal Associates, Inc.

Traffic and Transportation Consulting

Mr. Anthony Gallerano

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With this submission, the Applicant has added the 729-763 Meadow Street property (Block 8, Lot 1299.A) to the application, so as to provide for paving a two-way driveway to connect the 703-727 Spring Street property with North Avenue, thereby permitting delivery vehicles and others to traverse that site along the proposed drive.

Based on our review, we have the following comments to the LGN Traffic Response letter:

1. The Applicant should discuss the site's proposed on-site circulation and associated ingress/egress with US Rt. 1 & 9 NB.

The site circulation and access has been adequately described and no further response is required.

- 2.a. What are the hours and days of operation of the proposed AL use?

Comment responded to. No further response required.

- b. What are the time periods of employee arrival (am) and departure (pm)?

LGN notes that employees arrive starting at 5:30 am, but LGN's Comment 2.a. response states the site operation begins at 6:30 am. LGN shall address this discrepancy.

Related to the traffic counts performed on Wednesday, Sept. 18, 2019 at the north drive facility gate for the 6 am to 6 pm time period, there were 134 entering and 275 exiting trips (12 hour total). LGN noted that some drivers arrive by ridership (car pooling) or use of mass transit, and some use the southerly Rt. 1/9 NB drive for ingress. During the traditional street peak hour periods (7-9 am, 4-6 pm), site generated volumes were not large in number. The peak hour of site generated activity was 1-2 pm, with 145 trips (total 2-way).

As the site is currently being utilized for AL delivery services, how many delivery vans are currently being stored on-site and what is the corresponding existing employee number? This response should reflect the numbers on the Sept. 18, 2019 traffic count date, if possible.

- c. How many delivery service employees are anticipated by AL?

There are 150-175 delivery employees identified. Is this the future maximum number proposed?

- d. How many office employees will AL have?

LGN indicates that there will be no office employees; however, there are buildings to remain on-site having a total of 22,074 sf (+/-). What is the proposed use of these buildings? Is there no supervision of employees on the site provided?

Hamal Associates, Inc.

Traffic and Transportation Consulting

Mr. Anthony Gallerano

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October 8, 2019

3. How many delivery vans will be parked on-site and where?

Comment responded to. No further response required.

- 4.a. When AL delivery employees arrive in the am period, what parking spaces will be available to them for parking their cars? Will they temporarily park in an aisle, move their designated van out of its spaces and then move their personal vehicle into the van space? Reverse in the pm return period?

Comment responded to. No further response required.

- b. If the van pickup/drop-off parking maneuvers described in Comment 4.a. are proposed, does this affect vehicle circulation through the parking aisles? Applicant to discuss.

Comment responded to. No further response required.

- c. Do delivery van employees have to check-in at a central office area in the am/pm? If yes, how does this affect parking and circulation?

LGN to identify how many co-ordinators on-site and their function.

5. In addition to Amazon Logistics, are there now or will there be other tenants in the existing buildings? If yes, who are the 'other' users and what is the required parking for these 'other' tenants and their associated building area(s)?

There are a number of buildings remaining on-site (22,074 sf). What is their use to be?

6. What parking is required/needed for the AL tenant, separate from the AL delivery van storage?

LGN to discuss any required parking for the buildings to remain and/or any employees located on-site. Any municipal ordinance parking requirement for the buildings?

7. Will any of the existing auto related services (sales, servicing, etc.) remain active on-site if the AL application is approved? If yes, how will this use be accommodated on-site?

Comment responded to. No further response required.

8. What is the projected am and pm peak hour trip generation for the AL use? Does it occur during the street peak hours or at another hourly period?

How does the existing site activity relate to proposed traffic activity (i.e., existing vs proposed numbers of vans & employees)?

Hamal Associates, Inc.

Traffic and Transportation Consulting

Mr. Anthony Gallerano

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9. The site plan identifies 209 proposed parking spaces (including 5 handicapped). Will any other parking be permitted along building faces, property perimeter areas, etc., either in marked or unmarked parking spaces? Our recent field inspection indicated that parking in these type of areas is currently occurring.

The number of parking spaces has been increased from 209 to 293 spaces. LGN had noted, in their response to Comment #3, that approximately 200 delivery vans will be accommodated. Is there the potential for the site usage to intensify beyond 200 delivery vans, particularly considering the ever expanding use of on-line shopping/purchases?

10. As the site's only access is with US Rt. 1 & 9 NB, does the change in use affect the site's current NJ highway access permit? Is a 'Letter of No Interest' to be submitted to the NJDOT, if a new permit is not required?

LGN has summarized the grandfathered highway access permit volumes for the retail and manufacturing sites, that share use of the existing north and south access drives with US Rt. 1 & 9 NB (Spring Street). LGN has correctly noted that a permit can experience a change of use or expansion that can generate up to an additional 100 peak hour trips and a 10 percent increase in daily traffic generation. They have identified these permit volume increases in their Comment 10 Response table.

LGN has not calculated the peak hour and daily site generated volumes for the AI site, which would supplant the 61,648 sf manufacturing volumes shown on the Grandfathered Permit Volume table. They should perform this calculation and comparative analysis to support their conclusion that neither a new access permit from the NJDOT or a Letter of No Interest is required.

In LGN's response to Comment #10, they have noted that the proposed driveway connection to North Avenue will reduce the amount of traffic utilizing the Rt. 1 & 9 NB driveways. We concur with their observation, as the new drive will facilitate outbound traffic movements to North Avenue east/west and Rt. 1 & 9 SB, as well as inbound movements from North Avenue east/west. Related to the North Avenue 'alternative access' drive, HMA notes that the most recently revised NJ Highway Access Management Code redefines alternative access and how volumes using same are evaluated in determining an access permit type.

Additional Comments

11. Will any turn restrictions be imposed on traffic movements at the proposed access drive T-intersection with North Avenue?
12. Are there any existing traffic queuing problems on North Avenue that would affect traffic movements in/out of the proposed drive?

Hamal Associates, Inc.

Traffic and Transportation Consulting

Mr. Anthony Gallerano

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13. **What Agency or governmental body has jurisdiction of North Avenue at the location of the proposed access drive intersection with that roadway?**

14. **As shown on the Site Plan (Sheet C-300), at the southeast corner of the site there are two facing rows of 7 parking spaces (14 total). The aisle width dimension behind the westerly 7 spaces is not shown, but scales approximately 21 feet. This is less than the minimum 24 foot aisle width provided elsewhere on the site plan, which is the accepted standard for perpendicular parked vehicles. Applicant to respond.**

The foregoing represents our traffic review of the subject application. If you have any questions, please do not hesitate to contact us.

Very truly yours,

Hamal Associates, Inc.


Harold K. Maltz, P.E., P.P.
President

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