



ARCHITECTURE
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SPACE PLANNING
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September 26, 2019

**City of Elizabeth
Zoning Board**

50 Winfield Scott Plaza
Elizabeth, NJ 07201

**RE: Spring Street Development Corp.
Application No. Z-05-19
703-727 Spring Street
Jarmel Kizel Project Number: SSD-S-17-109**

Dear Chairman and members of the Board:

The following details our responses to City of Elizabeth Division of Engineering review comments dated May 13, 2019 and Harbor Consultants review letters dated September 5, 2019. **Please note that updated stormwater reports have not been provided with this submission. Should the Board act favorably on this application, revised reports and plans will be submitted.** For ease of review, each comment is repeated in *italics* and our responses are in **bold**.

**Planning Review: Harbor Consultants Letter dated
September 5, 2019**

General Comments

- 1. The applicant shall provide testimony in support of each variance being requested.*
**Response:
Testimony will be provided.**
- 2. The Applicant shall provide testimony as to the operation of the proposed facility, including hours of operation, number of employees, etc.*
**Response:
Testimony will be provided.**
- 3. A survey prepared by a licensed land surveyor shall be provided.*
**Response:
An updated survey is pending and will be provided as soon as completed.**
- 4. Landscaping is proposed consisting of 22 Aborvitae evergreens and 8 Boxwood shrubs. Additional landscaping should be provided.*
**Response:
Additional screening has been provided on the neighboring North Avenue parcel. Due to the mandated capping of this site, minimum landscaping is incorporated.**

5. *No signs are depicted on the plans. Any new signage shall comply with the City Code or the Applicant will be required to return to the Board for additional variances.*

Response:

Understood. No signage is proposed under this application.

6. *The purpose of the river stone along the perimeter of the parking area shall be clarified.*

Response:

The purpose was to provide a small pervious area to the site that would be relatively maintenance free.

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.*

Response:

Work is ongoing under the direction of an LSRP.

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.*

Response: Applicant does not propose repairs or alterations to the existing buildings at the site because such buildings are outdated and require total replacement. As an alternative to the site plan submitted, the Applicant would propose to demolish the majority of the existing buildings at the site to improve aesthetics.

9. *See attached memorandum prepared by HCI, dated 9/5/19 for stormwater management comments.*

Response:

No response necessary

10. *See attached letter from Hamal Associates, dated September 4, 2019, for traffic comments. Comments provided raise concerns that the proposed project will have a negative impact on the unbounding area. Based on our inspection of the site, there are a large number of cargo vans that are parked in an unorganized configuration.*

Response:

The Applicant's traffic expert will provide testimony at the public hearing.

11. *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. The number of vans to be parked on the site has not been provided, therefore it is not possible to determine if sufficient parking will be available for the building occupants.*

Response:

The Applicant's traffic expert will provide testimony.

12. *The site shall meet the requirements of the American with Disabilities Act and the New Jersey Barrier Free Code.*
Response:
The site will provide the required number of ADA spaces and an ADA accessible route to the main building to remain.
13. *The Applicant shall comply with all directives of the City of Elizabeth Fire Official.*
Response:
The Applicant will comply to the extent feasible and as applicable to this application.
14. *The Applicant shall comply with the comments of the City Engineer, dated 5/13/19.*
Response:
The Applicant will comply with the comments as agreed upon based on responses herein and further discussions with the City reviewer.
15. *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.*
Response:
The Applicant will comply. At this time, no other land use approvals are believed to be required.
16. *Prior to issuance of building permits, compliance with all conditions of approval indicated in the resolution shall be verified by the Board Engineer.*
Response:
The Applicant understands and acknowledges this condition.
17. *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.*
Response:
The Applicant will comply.
18. *The Applicant shall arrange a pre-construction meeting with the Board Engineer and Construction Official at least one week prior to start of construction.*
Response:
The Applicant will comply.
19. *An engineer's estimate for site improvements must be submitted prior to signature by the Board Chairperson.*
Response:
The Applicant will comply.

20. *The Applicant must post performance guarantees and inspection fees with the City of Elizabeth prior to beginning of any on-site construction activities.*

Response:

The Applicant will comply.

Engineering Review: Harbor Consultants Letter dated September 5, 2019

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.*

Response:

An updated survey is in progress for use in the subsequent reports and plans.

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.*

Response:

The updated plans will detail the compilation of revisions

3. *A boundary and topographic survey reflecting the current site conditions should be submitted.*

Response:

An updated survey is in progress for use in the subsequent reports and plans.

4. *The inlets and manholes located along the south property line should include the storm sewer pipes.*

Response:

Updated survey being ordered by applicant for use in the reports and plans.

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.*

Response:

An updated survey being ordered by applicant for use in the reports and plans. The requested information for existing on-site conditions, except for slope of the pipe was on previously submitted drawing C-1. Offsite will be provided for this request.

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.*

Response:

The relevant information for Woodruff Lane as depicted on the 1921 Sheet 16 Section J-9 map provided by the City will be checked during the updated Survey.

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.*

Response:

As noted in item 6, the offsite information is pending. To date the only existing conditions information available from City Files has been the J-9 map noted above and Sheet 10 Section I-9 along Spring Street. Further requests for information will be requested from the survey update and possibly from adjoining site plan information.

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.*

Response:

It is the understanding of the designer that 7:8-5 was intended to make sure that the flows for the "watershed" comply. This site, even though small in size, has multiple points of discharge due to pre-existing conditions that discharge to several locations along the boundary of the property. But in total it was presumed the entire site was in the same watershed for the regional area.

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.*

Response:

The requested table will be updated in a future submission.

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.*

Response:

The table noted as posted on the NJDEP website at <https://www.nj.gov/dep/stormwater/rainfalldata.htm> and is from USDA NRCS information dated August 2012, prior to Hurricane Sandy. NJDEP site also lists <https://hdsc.nws.noaa.gov/hdsc/pfds/index.html> which is the NOAA website for the Precipitation Frequency Data Server (PFDS) which allows data for a site based upon actual location and from up to date data from NOAA. The USDA NRCS sheet, under notes indicates the ability to use the NOAA data for "specific locations". The report was developed from the information from NOAA, available at the time of submission. In that the rainfall totals between the two charts are minimally different it will be changed to make use of the USDA-NRCS rainfall.

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.*

Response:

The report on pages 2 and 3 outlined the variability of the existing conditions of the site. The detailed information was then outlined in the table on page 2 of the existing conditions HydroCAD™ report. A table will be added to the narrative portion which provides that breakdown and the table location in the HydroCAD report.

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.*

Response:

With information being obtained from the updated survey these will be added to further delineate the selected areas.

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.*

Response:

The n value in the report was the "typical" value from HydroCAD. If after the updated survey and investigation of the PVC piping it is determined that condition is not valid at 0.010, we would recommend using the industry norm of 0.011 for PVC smooth interior. Normally we use 0.013 for RCP pipe.

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.*

Response:

In the HydroCAD program Corrugated PE with smooth interior is shown for typical conditions as 0.013. We would prefer to use this on any of the HDPE Pipe.

15. *The Hydro CAD diagrams for the existing and proposed pipe listing should be added to the stormwater management report.*

Response:

This will be provided in a subsequent submission.

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.*

Response:

The pre and post drainage area maps for the project, previously submitted drawings C-6 and C-7, do show the contributory areas with typical Tc lines indicated. The pre and post maps are underlain in the HydroCAD report as the diagram sheets. We can produce those sheets at full size if necessary. The pre and post sheets will be added to the back of the storm report, separate from the site plan package.

17. *Additional spot elevations and contours should be provided offsite around the site to properly evaluate the existing and proposed discharge points of analysis.*

Response:

Upon completion of the updated site survey the base map will be updated for topography.

18. *The minimum time of concentration used in the hydrograph calculations should be 10 minutes.*

Response:

The report will be adjusted. The Tc s' provided were based upon field conditions.

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.*

Response:

The HydroCAD Program uses the NJDEP WQ distribution. The report will be evaluated for that factor as the post conditions show the peak flows.

20. *The required TSS removal rate should be included in the drainage calculations.*

Response:

Based upon the amount of additional paved parking the applicant will be adding NJDEP approved Manufactured Treatment Devices to each of the storage areas being fed by the parking lot area. Roof drainage will be piped directly to storage units for peak flow control.

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.*

Response:

An attempt to add aerial coverage to the existing conditions will be undertaken as the site conditions are primarily compacted gravel with broken old pavement remnants as noted in the general site conditions report.

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.*

Response:

The post conditions changed the area draining to OS-4 due to loss of roof area on OS-4. Area P-6 had to be added to control that area. With new topography information from updated survey we will make any changes necessary.

23. *Based on the information shown on the existing conditions plan, it appears that portion of existing drainage area 0-3 is tributary to drainage area E-6. Additional spot elevations should be added in order to verify the drainage areas limits.*

Response:

With additional spot elevations due in the updated survey we will re-evaluate.

24. *Clarify why the existing storm sewer pipes and structures have been used as detention basins in the hydrologic calculations.*

Response:

For the proposed conditions all piping is being replaced and the existing inlets will be replaced with new. If the question is about the locations, it is related to the need to avoid AOCs with high concentrations of pollutants.

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.*

Response:

This information can be provided in a subsequent submission.

26. *The inlet drainage plan should be added to the drainage report.*

Response:

The city engineer's office has made the same request for the drainage to Woodruff Lane as that is the only existing piping running offsite. Evaluating that section will control a majority of the site. Normally for submissions to SCD and NJDEP they are satisfied with use of the HydroCAD methods for evaluation. We would request to be able to continue to use that method in that affects are contained within the site.

27. *The pre-development and post-development drainage areas plans should clearly delineate the drainage areas and each point of discharge.*

Response:

The pre and post Drainage Area maps, previously submitted drawings C-6 and C-7, attempt to show those areas and points. The flow to the north and east sides of the property, based upon review of ground conditions, are primarily sheet flow. Where there are storm manholes we indicate the flow to those units.

28. *The information used for the outlet devices of Ponds 1S, 2S., 3S, 4S and 5S, and 14 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.*

Response:

We would propose a discussion on whether the details on C-4 which shows the typical RetainIt™ structure being used and a table of the outlet devices adjacent to it suffices or what particular detail needs to be added.

29. *The information of the outlet devices of Pond T1 and 15 on the drainage report don't match with the existing conditions plan. The plans and drainage report should be revised for consistency.*

Response:

Additional information from the updated survey will confirm the field information to use on the plan.

30. Existing inlet 1-2 shows a portion of a 6" PVC inflow pipe. Additional information is required concerning the 6" PVC and possible additional tributary drainage area.

Response:

The information on the plan was limited to what was provided. The additional survey will attempt to uncover the additional information requested.

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.

Response: Generally secondary devices are the inflow grates which are allowed to be calculated as an overflow if needed or required.

32. 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.

Response:

The requested detail has been added to drawing C-900.

33. The ladder rung detail for sanitary and storm structures should be provided.

Response:

The ladder rung detail has been added to drawing C-900.

34. Details should be provided for all proposed monument and wall mounted signs.

Response:

No signage is proposed with this application.

35. The location of proposed trash enclosure should be added to the plans.

Response:

No trash enclosure is proposed for this plan. Garbage will be handled by a private contractor as needed.

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.

Response:

The requested note has been added to drawing C-300.

37. Provide a note on the plans indicating that all traffic signage and striping shall be in accordance with the latest edition of MUTCD.

Response:

The requested note has been added to drawing C-300.

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.*

Response: We request that providing this information be made a condition of final approval should the Board act favorably on this application.

39. *The applicant should provide a truck and vehicle turning circulation exhibit to verify that the on-site circulation is adequate for the required service and emergency vehicles access throughout the site.*

Response:

Given that this site has been used previously for large truck trailers and will be an open paved area, we respectfully request reconsideration of the request to provide this exhibit. If the Board decides to require, we can provide as a condition of final approval should the Board act favorably on this application.

40. *The location of no parking zones for fire fighting operations should be provided, including construction details.*

Response:

We request that providing this information be made a condition of final approval should the Board act favorably on this application.

41. *The limits of proposed pavement restoration, curbs and restriping along public roads should be shown on the plans.*

Response:

No work is currently proposed within the public right-of-way.

42. *Approval should be obtained from the fire official regarding the required fire lanes, markings, signage, striping and access for fire apparatus.*

Response:

We request that providing this information be made a condition of final approval should the Board act favorably on this application.

43. *Calculations should be submitted to demonstrate that the existing waterline is suitable for the proposed domestic and fire flow volumes and pressures.*

Response:

It appears this comment is the same as item 44. Please clarify.

44. *Provide domestic and fire flow water distribution system calculations. A minimum of 20 psi of residual pressure should be available for firefighting. Hydrant flow testing results should be submitted to confirm available fire flow (AFF).*

Response:

We request that providing this information be made a condition of final approval should the Board act favorably on this application.

Please note, no new buildings are being constructed so no additional demand is being placed on the system.

45. *Sanitary sewer and water demand calculations should be provided for the proposed project.*

Response:

We request that providing this information be made a condition of final approval should the Board act favorably on this application.

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, including lateral crossings, with corresponding clearances to reflect the avoidance of conflicts with other underground utilities.*

Response:

We request that providing this level of detail be made a condition of final approval should the Board act favorably on this application.

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*

Response:

Item 47 is a repeat of Item 32. See Item 32 response.

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.*

Response:

The requested note has been added to drawing C-300.

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.*

Response:

The requested note has been added to drawing C-300.

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.*

Response:

Drawing C-300 striping has been revised.

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.*

Response:

Additional dimensioning has been provided on drawing C-300.

52. *Spot elevations should be added to all proposed handicap parking spaces, ramps and landing areas to verify conformance with ADA requirements.*

Response:

Additional detailed grading can be provided on subsequent submissions as a condition of final approval should the Board act favorably on this application.

53. *In order to facilitate the review of the proposed grading, the grading plan should include slopes with arrows within the overall area.*

Response:

The Grading Plan will be updated with this information in a subsequent submission should the Board act favorably on this application.

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.*

Response:

The existing site conditions may limit being able to accommodate 1.5%. This can be further reviewed upon obtaining the updated survey. We request that providing this level of detail be made a condition of final approval should the Board act favorably on this application.

55. *Are new fences and gates proposed?*

Response:

No.

56. *Clarify if new water and gas lines will be required.*

Response:

No new service lines are proposed.

57. *The location of existing gas meters, water meters and vaults should be shown on the plans.*

Response: This information may be provided in the updated survey and can be provided as a condition of final approval.

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.*

Response: The Demolition Plan has been updated to match the callout on the Site Plan. The electric supply area will remain.

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.*

Response:
To the extent they are proposed at this time, that information is provided.

60. *The existing contours on Sheet C-400 should be shown on halftone dashed line.*

Response:
An updated drawing C-400 has been provided.

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.*

Response:
An updated drawing C-400 has been provided.

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.*

Response:
The City's illumination requirements have been added to the Lighting Plan. It is the intent to comply with the City's requirements.

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.*

Response:
For the Retainit units the grate on the unit provides an emergency overflow area. If the principal spillway, the outlet pipe, malfunctions the grate will allow relief of the flow.

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.*

Response: This will be discussed with the applicant and the City to determine the format in which they will require the O&M to be developed. Otherwise normal NJDEP outlines for the same will be

used as found in:

https://www.nj.gov/dep/stormwater/maintenance_guidance.htm

65. *The cold in place recycle pavement section detail on Sheet C-4 should be revised to include the thickness of the base course.*

Response:

The detail has been revised. It will be no less than 8".

66. *The subbase course of the standard full depth asphalt pavement section detail on Sheet C-4 should be 6".*

Response:

The detail will be upgraded but can a standard city detail be provided for this? The remediation cap structurally is adequate compared to the 6" requirement.

67. *The proposed manhole cover detail should include the year.*

Response:

The detail has been revised.

68. *Additional details should be provided for the proposed Retain it detention basin and outlet control structure.*

Response:

Drawing C-401 has the full layout for the Retainit units.

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.*

Response:

Please note that on C-401 a geotextile membrane encapsulates the structure and there is no infiltration.

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.*

Response:

The stormwater report outlines that no infiltration is allowed. If infiltration were to be allowed in any area the LSRP would have to prepare documentation on the same.

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.*

Response:

The Storm Cleanout Detail has been added to Drawing C-900.

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.*

Response:

The submission set has been revised so that it is one set of drawings with duplicate details eliminated.

73. *The Applicant shall comply with the comments of the City Engineer, dated May 13, 2019.*

Response:

Comments on the report are provided separately within this correspondence.

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.*

Response:

As noted in the opening to this response letter, new storm reports are not provided herein. Many of the comments have only been addressed in written form with some items requiring further discussion and clarification. Similarly, with site plan items, not all have been addressed. Being that this is a use variance application, we respectfully request many items be made a condition of final approval should the Board act favorably on this application.

Division of Engineering Letter dated May 13, 2019

1. *Proposed development shall comply with the applicable requirements of the City of Elizabeth Flood Prevention Damage Ordinance No. 3832 and Municipal Storm Water Control Ordinance No. 3844.*

Response:

The Flood Prevention Damage Ordinance 3832 has been replaced by 17.44 – confirmed with Engineer Loomis on 9/10/19. A review of the “Areas of Special Hazard” which would require compliance with 17.44 do not exist on or adjacent to the site as shown on a FEMA comparison map between the 2006 map cited in the ordinance, or on the 2015 Preliminary Map. The Stormwater Ordinance 3844 has been reviewed and will be complied with using updated information requested in the Harbor Consultant’s 9/5/2019 report, in addition to following responses.

2. *The pre-construction runoff rates in Table 2 do not appear to be consistent with the pre-construction runoff rates shown in Table 5. The run-off to Spring Street appears to be dramatically increasing from the pre-construction condition. The proposed run-off rate reductions need to be met at each point of analysis and for each storm event.*

Response:

Table 2 is not meant to be the same as Table 5 based upon specific points of analysis from available information provided on the survey maps. Table 5 analyzes the same points but reflects changes in flow due to re-grading of the lot or change in cover, such as landscape versus gravel. More explanation will be provided. The existing and proposed drainage of the site flows to the same generic watershed for the vicinity so it is not intended that any flow from the site would be diverted to a different watershed.

3. *No calculations or verification documentation was provided related to the TSS removal discussed in the report text. The applicant must document that they are meeting the water quality criteria required in the Storm Water Control Ordinance.*

Response:

In working with the project, we were not sure what level of control the City would require due to the existing conditions versus proposed. In this letter and the Harbor letter there is a request for total compliance with TSS. The RetainIt units are not yet certified under the NJDEP Manufactured Devices list therefore appropriate units for TSS removal will be added to the plan on a subsequent revision.

4. *The applicant needs to calculate the capacity of the existing sewer that the on-site stormwater management system will connect to for the 25-year storm and verify that it can convey the on-site stormwater.*

Response:

This issue was discussed with Mr. Loomis on 9/10/19 in that there are two size pipes noted on the survey plan. The one onsite is noted as a 12" PVC, with no known terminus at the property line. The second is one that was located by the surveyor at an inlet on Woodruff Lane which is 8". In that it does not seem probable that the 8" is the outlet Mr. Loomis confirmed we could work with the 12" line for any capacity calculations. The main storm drains in Woodruff Lane, as depicted on the 1921 Sheet 16 Section J-9 map, provided by the City, is a 15" RCP line.

5. *Any existing sewers or drains either inside buildings to be demolished or in parking areas that will no longer be needed must be properly sealed and abandoned.*

Response:

The revised drawings will provide notations addressing this item.

6. *The Proposed development shall comply with applicable NJDEP Regulations N.J.A.C. 7:14A-22.*

Response:

NJAC 14A-22 deals with sanitary sewer capacity. No increase in flow is proposed as a result of this proposed use. It is our response that NJAC 14A-22 is not applicable to this application.

7. *The Proposed development shall comply with applicable Joint Meeting of Essex and Union Counties Rules and Regulations as modified July 17, 2010, or latest revision.*

Response:

The cited reference appears to be for the Joint Sewerage Authority regulations which, with regard to stormwater does not seem to apply under sections 2.3 Groundwater Discharge, and 2.4 Stormwater nor does it appear to be applicable to this application in its entirety. To the extent it is applicable, applicant will comply.

8. *All applicable permits shall be obtained from this Department prior to construction.*

Response:

We are presuming that these would be standard Code Building and construction permits for development in addition to final site plan approval.

9. *Spring Street is U.S Highway #1 & 9, consult the NJDOT for any additional requirements.*

Response:

To the extent any approval is needed from the NJDOT, the applicant will comply. With regard to stormwater it is not intended to encroach upon or change any existing stormwater piping in Spring Street. The updated survey requested by Harbor will verify this status.

10. *Testimony All site work within the public right-of-way shall comply with the latest NJDOT details and specifications.*

Response:

With regard to the site plan and stormwater improvements, it is not intended to extend any improvement into NJDOT jurisdiction.

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Further, any inconsistencies can be addressed in a future submittal, along with additional changes that may be required as a result of the October 10, 2019 Zoning Board meeting. Should you have any questions or require additional information, please do not hesitate to contact our office.

Very truly yours,
Jarmel Kizel Architects and Engineers, Inc.

Gerard P. Gesario, PE
Director of Civil Engineering

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