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August 19, 2020
35637 00

Re: 1450 Route 70 East, LLC
D/B/A Spring Hills Cherry Hill LLC
Proposed Addition to existing Assisted Living Facility
Preliminary and Final Major Site Plan, Review #4
1470 Route 70 East
Block 463.09, p/o Lot 17
Application: 19-Z-0044

Cherry Hill Zoning Board of Adjustment
Township of Cherry Hill
820 Mercer Street
Cherry Hill, NJ 08034-0358

Dear Board Members:

Our office has received a Preliminary and Final Major Site Plan application for the above referenced \pm 7.6 acres site. The site is currently occupied by the Spring Hills Cherry Hill assisted living community. A use variance was granted in 2010 by the Zoning Board to permit a Senior Assisted Living Facility, which is not an expressly permitted use at that time. The applicant is proposing to demolish an existing parking area in the northwest portion of the property to construct a sixty four (64) bed Assisted Living Facility with Alzheimer Care. Site improvements are proposed to incorporate the new and existing uses, provide sidewalks, loading area, lighting, landscaping, and a new parking lot/drive aisle connection

The site is located in the Highway Business (B-2) Zone. The site is surrounded by other commercial and office uses as well as the Mark 70 Apartment Building. The site has access to/from Route 70 West for right turns only. Additional access is from Frontage Road. Frontage Road will provide access to Route 70 east- and westbound. The proposed facility will only have access through the existing lot and existing driveways.

The following information has been submitted in support of this application as prepared by T&M Associates dated October 19, 2019, unless otherwise noted:

1. Land Use Development Application, dated October 29, 2019
2. Updated Site and Subdivision Plan Checklist, dated February 7/2020
3. Preliminary and Final Site Plan, 16 Sheets, dated 10/18/2019, *revised through 8/14/20*
4. Boundary and partial Topographic Survey, 2 Sheets, prepared by Control Point Associates, dated October 3, 2019
5. Summary of Application with List of Variances and Waivers
6. Traffic Engineering Assessment, prepared by Shropshire Associates, LLC, dated October 17, 2019
7. Stormwater Management Report
8. Photograph Exhibit, undated
9. Resolution, POA 10-Z-0057
10. ALTA/ACSM Land Title Survey, 1 sheet, prepared by Coastal Design, undated/unsigned
11. Architectural Plans, 3 sheets, prepared by Borglund Associates, LLC, dated July 12, 2012

This information has been reviewed for conformance to the Zoning Ordinances of Cherry Hill Township. In conjunction with these requirements the following comments are offered.

Checklist and Completeness

We defer to the most recent Department of Community Development completeness and review letter for outstanding completeness items.

Zoning Requirements – Highway Business (B-2) Zone

1. Per Ordinance Section 415-A, the intent of the zone is to provide for the development of commercial activities that are oriented for automotive use and traffic, which constitute the main shopping and service areas within the municipality.
2. Per Ordinance Section 415-B.5., the assisted living facility is a permitted principal use within the zone.
3. The Bulk Requirements (per Ordinance Section 415-F) are as follows:

<u>Code</u>	<u>Description</u>	<u>Required</u>	<u>Existing</u>	<u>Proposed</u>	<u>Status</u>
415.F	Minimum Lot Size	20,000 SF	330,962 SF	330,962 SF	C
415.F	Minimum Lot Frontage	100 FT	410 FT	410 FT	C
415.F	Minimum Lot Depth	150 FT	511 FT	511 FT	C
415.F	Minimum Front Yard	25 FT	39.4 FT	39.4 FT	C
415.F	Secondary Front Yard	N/A	N/A	N/A	N/A
415.F	Minimum Side Yard	10 FT	42.2 FT	42.2 FT	C
415.F	Minimum Rear Yard	20 FT	31.6 FT	22.3 FT	C
415.F	Max Building Height	35 ft.	N/A	35 FT	C
415.F	Max Building Coverage	30%	16.15%	21.15%	C
415.F	Maximum Lot Coverage	70%	57.55%	56.25%	C
415.F	Minimum Open Space	25%	14.13%	15.43%	V
508.F	Minimum Residential Buffer	25 FT	>25 FT	55 FT	C
511.B.2	Parking: 1 space/bed + 2 spaces per employee (max ~ 130%)	103 spaces 134 spaces	244 (entire site)	215 spaces	C V
511.F	Parking Stall Size (Table 5.7)	9' x 18' 8'x16' (compact)	9' x 18'	9' x 18' 9' x 16' (compact)	C C
511.H	R.O.W. Parking Setback	20 FT.	N/A	N/A	N/A
511.H.2.c	Non-Residential Parking Setback	5 FT.	1.6 FT	4.85 FT	V

Notes:

C – Conforming Condition

V - Variance

* - Note, the # of parking spaces is specific to the project area, not the total property

Parking / Loading Calculations - For the Proposed Facility Only:

- According to Table 5.1 of the Zoning Ordinance, Convalescent Home, Nursing Home or Rest Home: One (1) space per three (3) beds + one (1) space per two (2) employees = 64 beds / 3 beds per space + 20 employees / 2 employees per bed = 32 spaces for the proposed use.
- **Total Parking Spaces Required: 32 spaces**
- **Total Parking Spaces Provided: 23 spaces. The plan notes 26 spaces, but it unclear where the three (3) additional spaces are.**

For the entire lot, including the existing and proposed facility, 103 parking spaces are required. The existing parking area has 399 parking spaces. Under the proposed conditions, the overall lot will have 215 parking spaces. **A variance is required because the number of parking spaces exceeds 130% of the required spaces.**

Design Waivers

These design waivers address the proposed facility at the rear of the site. We recognize any design waivers in the existing area of the site as pre-existing, non-conforming conditions.

1. A design waiver is required from Ordinance Section 508 from strict adherence to the landscape ordinance requirements.
2. A design waiver is required from Ordinance Section 508-G.2.c. The landscape plan should identify the groundcover proposed in the planting area. We note that ordinance Section 508G.2c requires that a groundcover be utilized in place of mulch for a minimum of 40% of the parking island area.
3. A design waiver is required from Ordinance Section 509-C.5 3 to permit lighting levels to exceed 0.25 footcandles along the property line, where a maximum of 0.25 footcandles lighting levels at property lines and right-of-ways is permitted. As this is a 24-hour facility, our office would like to see lighting levels reduced slightly, if possible. The Luminaire schedule indicates 1 lamp for the 'D' type lights but the detail indicates 2 lights per pole. This should be clarified. The mounting height of the wall mounted fixture should be indicated on the Luminaire schedule.
4. A design waiver is required from Ordinance Section 510-B.1 for strict adherence to the required number of loading spaces. The plan shows one (1) loading space where three (3) would be required.
5. A design waiver is required from Ordinance Section 511-N from providing bicycle racks where they are required.
6. A design waiver is required from Ordinance Section 514-E.5. to permit 8" diameter pipe, where the minimum pipe size is 15 inches. The engineer should discuss whether the pipe size can be increased. If the proposed 8" diameter pipe is for the roof drain, it should be clarified on the plan.

General Comments

1. Testimony should be provided for the following:
 - a. Description, days/hours of operation, number of employees, etc. for the proposed use. The applicant should present their operations report to the Board.
 - b. Time, type and frequency of trash pickup and deliveries.
 - c. Proposed architecture, colors, materials, etc.
 - d. Screening and buffering of mechanical equipment.
2. We defer to the Department of Community Development for review of all signage.
3. We defer to the Fire Marshal as to whether an 18-foot drive aisle is suitable for a fire lane.

Existing Conditions Plan

1. It is unclear if the proposed project will have an effect on the adjoining parking area along Course S52°16'02"E. Testimony should be provided to discuss.

Site Plan

1. The applicant should discuss the need for the wide drive aisle at the northern end of the site. Fire Lane signage and/or striping should be added at the north and south ends of the building where the pavement is wide. This area should not be used for parking.
2. The stop bar at the exit of the proposed facility should be relocated to the vicinity of the 'Do Not Enter' signage. It does not appear as though the stop control inbound to the proposed facility is necessary. The applicant's engineer should comment on this.

3. The parking summary notes (Sheets 4 and 5) indicate 26 new parking spaces; however, the plan appears to show 23 spaces. This should be clarified and should match the zoning schedule. The net loss of parking should also be verified. There are 399 existing and 215 proposed for the entire site based on the zoning schedule, for a net loss of 184 spaces. Further, note 3 indicates 16-foot parking spaces, which do not appear to be provided.
4. An ADA ramp detail has been provided. A site specific ramp detail, with proposed grades, should be provided for each proposed ramp within the project area to demonstrate compliance with ADA regulations.
5. The applicant should discuss if sidewalks will be connected to allow for pedestrians to walk from the main building to the proposed building.
6. The applicant should discuss the curbing on the east side of the building. The site plan depicts this area as proposed flushed curb. It appears that immediately adjacent to the proposed flushed curb, a wall is proposed. The wall should be labeled and its length provided. It scales to approximately 180 feet and varies in height from approximately 1 foot to 7.4 feet. Any walls greater than four feet in height will require structural calculations.
7. The sidewalks at the corners of the building may need to be reviewed, especially at the corners on the north end. With the addition of the sidewalk along the western side of the building, the entire building is surrounded by sidewalk which may increase its use. The less than 4' width at the corners may be a concern for maneuverability.
8. The proposed patio area should be labeled and elevations provided. Details should be provided for the barrier between the sidewalk and patio area. It is unclear if this is a fence or a wall.
9. With the reconfiguration of the western drive aisle, the proposed retaining wall appears to abut the curbing. In addition, it is unclear where the proposed buffer fence will be constructed. A detail should be provided showing its constructability between these three items and that the proposed wall can be constructed without impacting the adjoining property.
10. With the reconfiguration of the western drive aisle, it appears there may be more impervious surface provided once the project is finished. The applicant should discuss this proposed change and the zoning table and stormwater management report should be updated to reflect any increase (or decrease) in the impervious surface.
11. Turning templates have been provided. The applicant should also provide information regarding the vertical clearance at the Porte Cochere to demonstrate that emergency vehicle access will not be impacted.

Stormwater Management, Grading, Drainage and Utilities

NOTE: A revised stormwater management report should be provided. This should be updated to reflect the changes to the most recent submission of the site plans. It appears a wall has been added along the eastern side of the building to deflect runoff from entering the adjacent property. It also appears with the change in width of the drive aisles that the impervious surface has been increased.

The proposed project will remove an underused parking area and construct a 2-story Assisted Living Facility and associated infrastructure. The management of stormwater will be roof drains piped into the inlets on the western edge of the project area, eventually draining into an existing drainage ditch. The proposed disturbance is over 1 acre and, therefore, the project qualifies as a major development under the NJDEP Stormwater requirements. The engineer should clarify the area of disturbance - it is shown on sheet 5 as 2.15 acres and sheet 11 as 1.87 acres. There appears to be a net reduction in coverage; however, the engineer should verify this.

1. The project proposes to disturb more than one (1) acre of land and is classified as a "major development" for the purposes of stormwater management and must comply with the requirements of NJAC 7:8 and the Cherry Hill Township's Ordinance. Therefore, the project must meet the following requirements:
 - a. Address the rate and volume of runoff from the project site. This may be done in one of three ways as outlined in NJAC 7:8:
 - i. Reduce the peak rate of runoff from the project area by 50%, 25%, and 20% for the 2 year, 10 year, and 100 year storms, respectively; or
 - ii. Demonstrate that the rate of runoff for the project is not increased from the pre-developed condition at any point along the post-developed condition hydrograph; or
 - iii. Demonstrate that the peak rate of runoff is not increased and that the increase in volume and variation in timing will not have an adverse downstream impact.

➤ *The applicant should provide the pre- and post-construction calculations to demonstrate compliance with the requirements listed above and specify how compliance is met with the reduced impervious coverage. Pre- and post-construction drainage area maps should be provided. In addition, as this is a small portion of the parcel being developed, the analysis should include any drainage from the remainder of the property to show its impact on the existing drainage ditch.*
 - b. Reduce the Total Suspended Solids (TSS) loading in stormwater by 80% for new impervious.

➤ *There is a net reduction of 0.138 acres in impervious surface in the post construction condition. Accordingly, this requirement is not applicable.*
 - c. Demonstrate that the amount of groundwater recharge in the post-developed condition is equal to or greater than the pre-developed.

➤ *The project is located within a Metropolitan Planning Area, thus the requirement for groundwater recharge is not required.*
 - d. Incorporate low impact development techniques to the maximum extent possible.

➤ *The LID checklist should be provided.*
2. The drainage report provided is inconsistent within its summary. It states that the project is not a major development as defined by N.J.A.C 7:8 since the total disturbance is less than one acre, yet later in the report it states the overall site disturbance is greater than one acre. Under Project location, the first paragraph incorrectly lists the Block Number as 460.09 rather than Block 463.09. In the 2nd paragraph may reference a different project.
3. Drainage arrows should be shown to indicate the direction of flow.
4. Details should be shown for the drainage ditch. It appears from the stormwater report that the stormwater from the site will be discharged into the drainage ditch.
5. The applicant should discuss how the sheet flow will be addressed at the locations with the proposed flush curbing. Our office recommends erosion protection at the bottom of the wall along the eastern edge.
6. An Operation and Maintenance Manual for the Stormwater Facilities should be provided by the applicant as a stand-alone document, separate and apart from the Stormwater Management Report and Land Development Plans.
7. The profile for the forcemain should be verified at the connection to the existing manhole.

8. The construction entrance is shown on the Soil Erosion and Sediment Control (SESC) Plan. Access to the project is through a parking lot. The applicant shall discuss plans to assure that the remainder of the property is not impacted by the proposed construction.
9. The locations for the stockpiles should be shown on the SESC Plan.
10. The inlet type should be shown on the SESC plan.

Lighting and Landscaping

1. The applicant should consider reducing the amount of paving at the north side of the proposed building. This could reduce the amount of impervious surface provided and increase the amount of landscaping.
2. The proposed planting area between the parking lots is currently paved. A note should be added to the Planting Notes requiring that all subbase material be removed and replaced with topsoil having a minimum organic matter content of 4%.
3. Aerial imagery indicates that there are existing trees in proximity to the westerly driveway. If they are located within the subject tract they should be depicted on the plan and qualified with regard to species, size and condition. Substandard or hazardous trees should be identified on the plans and removed.
4. We recommend that shade trees be installed along the driveway to the extent they don't conflict with the aforementioned trees.
5. There does not appear to be curb or wheel stops along the edge of the parking lot servicing adjacent lot 15. Consequently, we recommend that the proposed planting placement be adjusted to preclude vehicular damage from encroachment into the planting area.

Traffic

1. This site is not proposed to generate significant additional traffic to the site, as patients do not drive. Therefore, only staff and visitors will generate the traffic for the new facility. The new facility is proposed to generate 12 trips in the AM peak hour (7 in, 5 out) and 28 trips in the PM peak hour (5 in, 13 out). The applicant should further discuss how the peak hours relate to shift changes and staffing for the proposed facility.
2. The applicant's traffic engineer should address whether the expansion will meet the existing NJDOT Access Permit for the site.

Details

1. A detail for the proposed buffer fence should be provided.
2. Connections for the roof drain cleanouts should be provided.
3. An ADA parking space striping detail should be provided.
4. The concrete pad for the trash enclosure shall be NJDOT Class B concrete and labeled as such.
5. The proposed trash enclosure area has been revised. An up-dated detail should be provided. Bollards should also be provided at the trash enclosure.
6. A detail for the proposed flush curb should be provided.

Administrative

1. A night light test prior to the certificate of occupancy is recommended as a condition of approval.
2. An estimate for all on/off site improvements should be prepared and submitted to the Department of Community Development upon final stamped approval of the plans.

3. Prior to construction start, Ordinance requirements regarding review escrow, inspection escrows, pre-construction meeting, etc. must be met.

Permits and Approvals

The following permits and approvals may be required:

1. NJDOT
2. NJDEP TWA
3. Camden County Planning Board
4. Camden County Soil Conservation District
5. Camden County Municipal Utility Authority
6. Cherry Hill Township Fire Marshal
7. Cherry Hill Police Department
8. Cherry Hill Code Enforcement
9. Cherry Hill Engineering & Public Works
10. Any others as necessary

Should you have any questions or require additional information, please do not hesitate to contact me.

Sincerely Yours,



C. Jeremy Noll, PE, CME, CPWM
Zoning Board Engineer

SEA/mbs

cc: Steve Musilli, Director of Public Works (via email)
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