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January 3, 2024

Neptune Township Planning Board
25 Neptune Boulevard
P.O. Box 1125
Neptune, NJ 07754-1125

**Re: Preliminary and Final Major Site Plan
Coast Linen Services
Lots 2, 3, & 4 Block 421
Our File NTPB 23-23**

Dear Board Members:

Our office received and reviewed an application for Preliminary And Final Major Site Plan approval in conjunction with the above referenced project.

1. Submitted Documents

- Preliminary and Final Major Site Plan for Coast Linen Services, Block 421, Lots 2, 3, & 4 consisting of ten (10) sheets prepared by Patrick R. Ward, P.E., P.P., of InSite Engineering LLC dated May 22, 2023, with no revisions.
- Architecture Plans entitled "Proposed addition to: Coastal Linen Services, 1100 6th Avenue, Neptune, New Jersey" consisting of two (2) sheets prepared by Eric L. Wagner, AIA, of Kellenyi Johnson Wagner dated May 15, 2023, last revised October 25, 2023.
- Soil Erosion & Sediment Control Plan consisting of three (3) sheets prepared by Patrick R. Ward, P.E., P.P., of InSite Engineering LLC dated May 22, 2023, with no revisions.
- Plan of Survey of tax map Lots 2, 3, & 4 in Block 421 consisting of one (1) sheet prepared by Robert L. Vallee, P.L.S., of Vallee Surveying LLC, dated February 9, 2023, last revised March 6, 2023.
- Stormwater Management Summary consisting of one (1) sheet prepared by Patrick R. Ward, P.E., P.P., of InSite Engineering LLC, dated May 22, 2023, with no revisions.

- Circulation Impact Study consisting of one (1) sheet prepared by Patrick R. Ward, P.E., P.P., of InSite Engineering LLC, dated May 22, 2023, with no revisions.
- Environmental Impact Statement consisting of one (1) sheet prepared by Patrick R. Ward, P.E., P.P., of InSite Engineering LLC, dated May 22, 2023, with no revisions.
- Community Impact Statement consisting of one (1) sheet prepared by Patrick R. Ward, P.E., P.P., of InSite Engineering LLC, dated May 22, 2023, with no revisions.

We have completed our engineering and planning review of the submitted documents and offer the following comments:

2. Completeness Waiver Review

The Applicant has requested the following completeness waivers from the Township's Land Use Ordinance Completeness Checklist.

Testimony to be provided:

- A. Ordinance Section 812.02.B.7 – Boundary, nature and extent of wooded acres, swamps, bug and ponds within the site and within two hundred (200') feet.
- B. Ordinance Section 812.02.B.8 – Existing and proposed manholes, sewer lines, fire hydrants, water lines, utility poles and all other topographic features of a physical or engineering nature with the site and within two hundred (200') feet thereof.
- C. Ordinance Section 812.02.B.9 – All existing structures on the site and within two hundred (200') thereof, including their use, indicating those to be destroyed or removed and those to remain.
- D. Ordinance Section 812.02.B.12 – A grading plan showing the existing and proposed grading contours at one foot (1') intervals throughout the tract, except if slopes exceed five percent (5%), a two foot (2') interval may be used, if the exceed ten percent (10%), at five foot (5') interval is permissible. Datum shall be United States Coast and Geodetic Survey Datum (MSL=O) and source of datum and benchmarks shall be noted. In addition to proposed grading contours, sufficient additional spot elevations shall be drawn to clearly delineate proposed grading.

- E. Ordinance Section 812.02.B.14 – Offsite Drainage Plan
- F. Ordinance Section 812.02.B.16 – Soil Boring Logs

3. Site Analysis and Projection Description

- A. The subject property, known as Lots 2, 3, & 4, Block 421, consisting of 2.96 Ac. (128,943.7 sq. ft.) with frontages on Fifth Avenue, Sixth Avenue, and Memorial Drive.
- B. The property is currently development with a one-story commercial building that is occupied by a linen supply company.
- C. The Applicant is proposing a two-story addition at the rear of the existing building.

4. Zoning and Land Use

- A. The property is located in the TRV: Transit Village Zoned District.
- B. The existing use is personal service (Coast Linen Services) which is permitted.
- C. The Applicant is proposing a two-story addition. The proposed first floor use is personal service and the proposed second floor use is office space. Both of these uses are permitted.

5. Variance and Design Waivers

- A. Outlined in the table below are the proposed bulk conditions for the site:

Description	Required	Existing	Proposed
Minimum Lot Area	5,000 sf	128,943.7 sf	No change
Minimum Lot Width	50 ft.	300 ft.	No change
Maximum Lot Coverage	80%	97.6% (NC)	94.71% (V)
Minimum Front Yard Setback			
Fifth Avenue	0 ft	66.3 ft	No change
Sixth Avenue	0 ft	0.71 ft (NC) over property line	5.81 ft
Memorial Drive	0 ft	0.87 ft	No change
Maximum Front Yard Setback			
Fifth Avenue	15 ft	66.3 ft (NC)	No change
Sixth Avenue	15 ft	0.71 ft over property line	5.81 ft
Memorial Drive	15 ft	0.87 ft	No change
Minimum Side Yard Setback	0 ft.	25.2 ft	No change

			87.47 ft to addition
Maximum Side Yard Setback	15 ft.	25.2 ft. (NC)	No change 87.47 ft. (V) to addition
Minimum Rear Setback	0 ft.	(N/A)	(N/A)
Maximum Building Height	48 ft.	19 ft.	31.18 ft.
Minimum Building Stories	2 stories	1 story (NC)	2 stories (Addition)
Maximum Building Stories	4 stories	1 story	2 stories (Addition)

(V) Variance required (NC) Existing Non-Conformity (N/A) Not Applicable

Article IV – Zoning District Regulations

- B. Under ordinance section 412.07 B.(b)(i) states that for non-residential uses, fences and decorative walls may be erected in the front yard extending to the rear or side lot lines, provided that such fences and walls are located within fifteen (15) feet of a street line they shall not exceed four (4) feet in height, as measured from the ground level. Fence posts, corners, gateways, and wall piers and entryways shall not exceed five (5) feet in height. The Applicant is replacing the existing chain link fence in kind and at the existing height. The existing height varies but is greater than four (4) feet along the Fifth Avenue and Memorial Drive front street line. **A variance is required.**
- C. Under ordinance section 412.07 B.(b)(ii) states that for non-residential uses, fences and decorative walls may be erected in the front yard extending to the rear or side lot lines, provided that such fences and walls are located more than fifteen (15) feet from a street line they shall not exceed six (6) feet in height, as measured from the ground level. Fence posts, corners, gateways, and wall piers and entryways shall not exceed seven (7) feet in height. The Applicant should provide testimony on the existing fence condition and the existing height.
- D. Under ordinance section 412.07 B.(c) states that chain link fences shall be prohibited in front yards in all zone districts. The Applicant is proposing a chain link fence in the front yards of Fifth Avenue and Memorial Drive. **A variance is required.**
- E. Under ordinance section 412.12 B. states that (Loading space dimensions.) standard institutional and light industrial/warehouse loading spaces shall measure at least fifteen (15) feet wide by sixty (60) feet long, with a height clearance of not less than twenty (20) feet. The plan indicated a truck size of 8 feet in width by 30 feet in length by 13 feet 6 inches in height. **A variance is required.**

- F. Under ordinance section 412.17 D. Table 4.2 Parking regulations indicate that for personal service use the off-street parking requirement is 1 space per 250 square feet of gross floor area and for office is 1 space per 300 square feet of gross floor area. The chart for off-street parking on the plan indicates manufacturing and assembly use where the existing and proposed uses are personal service and office. The chart on the plan should be revised. The proposed site requires 183 off-street parking spaces. The Applicant proposes 44 off-street parking spaces which includes 2 ADA compliant spaces. **A variance is required.**

The Applicant shall address EV Make Ready parking spaces in accordance with the state requirement.

- G. Under ordinance section 412.21 D. should be E. (Storage) states that no trailer may be temporarily or permanently used for storage of materials in any zone district. The plan of survey indicates many trailers on site. The Applicant should provide testimony on the existing and proposed use of the trailers. **A variance is required.**
- H. Under ordinance section 416.07.B.1.(a) states that the size of a wall mounted sign is 48 square feet, or one-and-five tenths (1.5) square feet for each lineal foot of wall face that the sign is mounted on, whichever is less. The permitted sign size is 48 square feet. The Applicant is proposing a sign size of 48 square feet, which conforms. The Applicant should provide a detail of the wall mounted sign. Testimony to be provided.
- I. Under ordinance section 416.07.B.1.(b) states that the mounting height of 8 feet maximum (including hardware) and not to extend more than 2 feet above the roof line. The site plan indicates a mounting height of 15.5 feet and the architectural plans indicate a mounting height of 15 feet. **A variance is required.** The plans should be revised to indicate the proposed mounting height.
- J. Under ordinance section 416.07.B.1.(c) states that the maximum quantity of wall mounted sign is one (1). The building currently has one (1) wall mounted sign and is proposing a second wall mounted sign. **A variance is required.**
- K. Under ordinance section 416.07.B.1.(e) states that the projection of a wall mounted sign is 1 foot maximum. The Applicant should provide a detail of the wall mounted sign to address compliance.

Article V – Performance and Design Standards

- L. Under ordinance section 503 B.1. states that buffering shall consist of a minimum ten (10) foot wide area surrounding all sides of a parking lot exposed to view. The south parking lot has an approximate buffer of 7 feet

from the Memorial Drive and Fifth Avenue frontages. The Applicant is proposing no buffer on east of the parking lot. **A design waiver is required.**

- M. Under ordinance section 503 B.2. states that where such parking area is located on a tract adjacent to a residential use or district, such screening shall consist of a minimum six (6) foot-high visually impervious screen. The height of any required screen shall decrease to a maximum of three (3) feet in height where driveways approach sidewalks or walkways, in order to provide adequate visibility of pedestrians from motor vehicles and police visibility into the lot. The Applicant is proposing no buffer on north of the parking lot adjacent to residential use. **A design waiver is required.** An existing fence is located on the north side of the parking lot, but no height and no type of fence are provided. Testimony should be provided.
- N. Under ordinance section 503 C.1. states that buffering shall consist of a minimum ten (10) foot wide area surrounding all sides of a loading area exposed to view. Where such loading area is located on a tract adjacent to a residential use or district, such buffering shall consist of a minimum twenty-five (25) foot wide area surrounding all sides of a parking lot exposed to view. The Applicant is proposing a buffer width of 8 to 9 feet for the residential use to the west (lot 1). **A design waiver is required.**
- O. Under ordinance section 503 C.2. states that screening shall consist of a minimum ten (10) foot high visually impervious screen. If such screen consists of a wall or fence, the buffer area between the wall or fence and the lot line shall be a minimum of ten (10) feet in width and shall also be extensively planted with both deciduous and evergreen trees. The Applicant is not proposing a buffer between the loading area and Sixth Avenue. **A design waiver is required.**

The Applicant is proposing a landscaped buffer of 10.7 feet between the addition and Sixth Avenue, which complies.

- P. Under ordinance section 505 B.4. Table 5.2 driveways width requirements for warehouses and light industrial uses for one way traffic flow the minimum driveway width is 18 feet and maximum driveway width is 22 feet. For two-way traffic flow the minimum driveway width is 26 feet and maximum driveway width is 30 feet. The driveway widths for the three driveways on Fifth Avenue are approximately 25 feet and appears to be two-way traffic flow. **A design waiver is required.**

The proposed driveway width on Sixth Avenue is 20 feet for two-way traffic flow. **A design waiver is required.**

- Q. Under ordinance section 509 states that the landscaping plan shall be prepared by a New Jersey certified landscape architect. The landscaping plan provided was prepared by a Professional Engineer. The Applicant should revise the plans.
- R. Under ordinance section 509 I.1. states that the perimeter of all parking lots shall be setback from all rear and side lot lines by a minimum of ten (10) feet. The Applicant is proposing off-street parking approximately 5 feet from the west side property line. A design waiver is required. The Applicant complies with the setback to the north side property line.
- S. Under ordinance section 509 I.1.(a) states that side and rear yards shall be landscaped with a combination of evergreen shrubs and deciduous trees to form a screen a minimum of six (6) feet tall at the time of planting. Buffer tree spacing for foliage similar to the White Pine shall be five feet (5') on center and similar to the Arborvitae shall be three feet (3') on center. The Applicant is not proposing any landscaping along the north and west property line. A design waiver is required.
- T. Under ordinance section 509 I.3. states that for parking lots containing sixteen (16) to ninety-nine (99) spaces, a minimum of five percent (5%) of the interior area of the parking lot shall be provided with planting islands containing a minimum of one (1) deciduous tree planted for every five (5) parking spaces abutting such island. The Applicant is not proposing any planting islands. A design waiver is required.
- U. Under ordinance section 509 I.3.(a) states that the minimum width of planting islands shall be four (4) feet on the side of parking spaces six (6) feet between parking bays (head-to-head parking). If sidewalks are incorporated through either the long sides of the landscape islands between parking bays or through the landscape islands on the sides of parking spaces, their width shall be added to these requirements. The Applicant is not proposing any planting islands. A design waiver is required.
- V. Under ordinance section 509 I.3.(b) states that no more than eight (8) parking spaces shall be placed in one row of parking without an intervening landscape island. The Applicant is not proposing any intervening landscape island. A design waiver is required.
- W. Under ordinance section 511 A.2.(a) states that security lighting design for commercial developments shall employ timers on all or a portion of the site lighting that reduces the average illumination to the minimum requirements of this Ordinance within one hour after close of business or before midnight, whichever occurs earlier. The site plan indicates all proposed lights to remain on from dusk until dawn. A design waiver is required or revise the plans to comply.

- X. Under ordinance section 511 A.2. states that safety lighting design shall employ motion sensors so that illumination occurs only when someone is in the immediate area. The site plan does not indicate that motion sensors are being used. **A design waiver is required or revise the plans to comply.**
- Y. Under ordinance section 511 A.2. (c) states that display, advertising and specialty lighting, excluding interior illuminated or backlit identification signage, shall be turned off at or before midnight. The plans do not indicate that the wall mounted sign is being lighted or backlit sign. **A design waiver is required or revise the plans to comply.**
- Z. Under ordinance section 511C. (Off-premise effects.) states that any other outdoor lighting such as building and sidewalk illumination, driveways with no adjacent parking, the lighting of signs and ornamental lighting, shall be shown on the lighting plan in sufficient detail to allow a determination of the effects upon adjacent properties, traffic safety and overhead sky glow. The objective of these specifications is to minimize undesirable off-premises effects. No light shall shine into building windows, nor onto streets and driveways so as to interfere with or distract driver vision. To achieve these requirements, the intensity of such light sources, the light shielding and similar characteristics shall be subject to site plan approval. Wall mounted fixtures are only permitted if directed into a site and not positioned towards neighboring properties or public streets. Testimony should be provided.
- AA. Under ordinance section 511 D. (Building-attached fixtures.) states that light fixtures attached to the exterior of a building shall be designed to be architecturally compatible with the style, materials, colors and details of such building and other lighting fixtures used on the site. Consideration shall also be given to the type of light source utilized and the light quality such produces. The type of light source used on buildings, signs, parking areas, pedestrian walkways and other areas of a site shall be the same or compatible. The use of high-pressure sodium lighting shall be prohibited for all fixtures. Testimony should be provided.

6. **Variance Proofs**

- A. A number of “c” variances are required. There are two types of c variances with different required proofs.
 - 1) Boards may grant a c (1) variance upon proof that a particular property faces hardship due to the shape, topography, or extraordinary and exceptional situation uniquely affecting the specific property.

- 2) Boards may grant a c (2) variance based upon findings that the purposes of zoning enumerated in the MLUL are advanced by the deviation from the ordinance, with the benefits of departing from the standards in the ordinance substantially outweighing any detriment to the public good. The Supreme Court's ruling in Kaufmann v. Planning Board for Warren Township provides additional guidance on c (2) variances, stating that "the grant of approval must actually benefit the community in that it represents a better zoning alternative for the property. The focus of the c (2) case, then will be... the characteristics of the land that present an opportunity for improved zoning and planning that will benefit the community.
- 3) The Applicant must also show proof of the negative criteria for "c" variances, which requires evidence that the variance conditions do not substantially impair the intent of the zone plan or ordinance, nor cause substantial impairment of the public good.

7. Site Plan Review

A. Traffic Circulation and Parking:

- 1) The Applicant's provided a circulation impact study and concluded that due to the limited size of the proposed building addition and dense commercially developed nature of Memorial Drive, the proposed improvements on local traffic may be considered de minimis. The Applicant should provide testimony on the additional traffic from the addition.
- 2) The Applicant should be prepared to discuss the following:
 - a) Unloading area, effects on traffic circulation, schedule time of deliveries, and shipments.
 - b) Hours of deliveries
 - c) Type of delivery truck.
 - d) During delivery testimony should be provided whether or not trucks remain idle or is the engine is running.
 - e) Hours of operation
- 3) Site triangles and associated easements in accordance with the NJDOT shall be shown on the plans. All proposed site triangles and associated easements will be required to comply with the Township of Neptune regulations in Ordinance Section 520.b and the NJDOT.

Likewise, the Applicant shall address clear site triangles per Ordinance 505.B.8.

The plan shall address all driveways.

- 4) The plans shall be submitted to the Neptune Township Fire Official to address fire lanes, hydrant connections (if required) and directional markings.
- 5) In accordance with Ordinance Section 412.17 Table 4-2 the following spaces are required:

			Required
Manufacturing	1 space per 1,500 sf	$41,631 \text{ sf} / 1,500 = 27.75 \text{ spaces}$	28
Office	1 space per 300 sf	$4,645 \text{ sf} / 300 = 15.48 \text{ spaces}$	16
Total			44
Proposed			44

Under the ordinance the use is considered a personal service:

			Required
Personal Service	1 space per 250 sf	$41,631 \text{ sf} / 250 = 167 \text{ spaces}$	167
Office	1 space per 300 sf	$4,645 \text{ sf} / 300 = 16 \text{ spaces}$	16
Total			183

A variance is required.

B. Drainage and Stormwater Management

- 1) The site is not classified as a “major development” because the project does not disturb one or more acres of land and does not create one quarter acre or more of new impervious surfaces. The project is not a major development and does not require stormwater quantity reductions, stormwater quality and groundwater recharge.
- 2) The Applicant indicated the proposed improvements will not increase stormwater runoff from the site. Testimony to be provided.
- 3) Our office recommends all onsite inlets be updated to eco grate inlets to control floatable debris into the stormwater drainage system, and consideration of stormwater treatment to offset lack of onsite regulation and landscaping.

C. Utilities

No new utilities are proposed with this Application. Testimony to be provided.

D. Environmental Impact

- 1) The Applicant is required to provide testimony for the Environmental Impact Statement in compliance with the Township of Neptune Land Development Ordinance No. 4-23; Section 2 entitled "Environmental Impact System". The Applicant shall provide testimony with regard to the following:
 - a) Testimony shall be provided to address recycling and solid waste disposal for the site.
- 2) The Applicant should also provide testimony to address related key elements of the Environmental Impact Ordinance section 811.01 with regards to noise, lighting, air pollution and impacts of water quality from the proposed parking lot.
- 3) The Applicant shall provide testimony addressing ambient noise levels for the proposed operations adjacent to residential properties.

E. Community Impact Statement

- 1) The Applicant shall provide testimony to address key elements of the community impact with regards to facilities and fiscal impact.
- 2) The Applicant indicates due to the limited nature of the proposed addition, the project will have a positive impact on the current tax base for the Township with regard to municipal tax revenues versus cost. Testimony should be provided.

F. Lighting

- 1) The Applicant shall address existing and proposed site lighting. The plans do not indicate lighting for the entire site.
- 2) The Applicant shall address decorative lampposts in accordance with Ordinance Section 521.B.4.

- 3) The following notes shall be added to the Plan:
 - a) The use of high-pressure sodium lighting shall be prohibited for all fixtures.
 - b) All lighting shall provide for non-glare lights focused downward.
- 4) The Applicant shall shield all parking lot lighting spillage from adjacent properties.

G. Landscaping

- 1) The Applicant shall address existing and proposed landscaping. Testimony to be provided. Our office recommends street trees to be proposed along Fifth and Sixth Avenues and address the health and viability of existing trees.
- 2) The following notes shall be added to the Landscape Plan:
 - a) “Only nursery-grown plant material shall be utilized” per Ordinance Section 509.E.
 - b) “All landscaped areas shall be well maintained and kept free of all debris, rubbish, weeds, tall grass, other overgrown conditions and the storage of any equipment or materials” per Ordinance 509.E.
 - c) “The developer shall be required to replace dead or dying plant material for a period of two zoning permits for occupancy and shall post a maintenance guarantee for such pursuant to Article X of this ordinance” per Ordinance Section 509.F.
 - d) “All plantings shall be installed free from disease in a manner that ensures the availability of sufficient soil and water for healthy growth is not intrusive to underground utilities.

H. General Site Improvements

- 1) The Applicant shall revise the coversheet to address the following:
 - a. The authorized agent for the Owner/Applicant notarized signature block should appear on the cover sheet.

- 2) The following General Notes shall be added to the plan:
 - a) “All proposed improvements are in accordance with ADA requirements.”
 - b) “All construction shall be in accordance with Neptune Township Design Standards and Details.”
 - c) “No soil shall be removed from the site without the written approval of the Director of Engineering and Planning.”
 - d) “All proposed utilities shall be placed underground”
 - e) “Any existing sidewalk damaged during construction will be replace by the Applicant as directed by the Township Engineer.”
 - f) “During construction, the Applicant shall comply with solid waste public health noise codes.”
- 3) The Applicant shall address the need for a dumpster enclosure in accordance with Ordinance 515.
- 4) The plans indicate the site has trailers, please address use in accordance with Ordinance 07-25 and Ordinance 16-23.

8. Conditions of Approval

- A. Monmouth County Planning Board
- B. Neptune Township Developers Agreement
- C. Neptune Fire Official
- D. Performance guarantees and engineering inspection fees
- E. Payment of Affordable Housing

Please be advised that additional comments may follow upon completion of testimony and/or submission of further revisions by the Applicant.

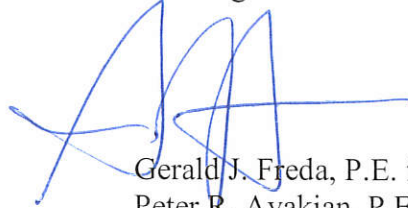
Should you have any questions regarding this matter, please do not hesitate to contact our office.

Very truly yours,

LEON S. AVAKIAN, INC.



Jennifer Beahm, P.P.
Planning Board Planner



Gerald J. Freda, P.E. for
Peter R. Avakian, P.E.
Planning Board Engineer

MM:mcs

cc: Kristie Dickert, Administrative Officer
Mark Kitrick, Esq., Board Attorney
Gregory Vella, Esq., Applicant's Attorney
Patrick R. Ward, P.E., P.P., Applicant's Engineer
Eric L. Wagner, AIA, Applicant's Architect
Brian Santonello, Applicant

NT/PB/23/23-23a