

January 16, 2026

Chairman Anthony LoPresti
Borough of Raritan Planning Board
22 First Street
Raritan, New Jersey 08869

**RE: Technical Review 1
Raritan Mall Urban Renewal, LLC
Preliminary & Final Major Site Plan
166 Orlando Drive, Raritan, New Jersey
Block 116.01, Lot 11.01
Our Project Number: 3300063**

Dear Chairman LoPresti and Board Members:

This office is in receipt of the following items pertaining to the above-referenced application:

- A. Borough of Raritan Application for Site Plan – Subdivision Plan – Variance, dated October 23, 2025.
- B. Borough of Raritan Checklist 5 for Determining Completeness of Application for Preliminary Site Plan.
- C. Borough of Raritan Checklist 6 for Determining Completeness of Application for Final Site Plan.
- D. Certification of Taxes Paid for Block 116.01, Lot 11.01, prepared by Tori B. Cesario (Borough Tax Collector), dated October 10, 2025.
- E. Report entitled “Raritan Mall Redevelopment Plan, Borough of Raritan, New Jersey, Block 116.01, Lot 11.01”, prepared by Joseph A. Brosnan PE, PP, CME, dated March, 2024.
- F. Borough of Manville Certified List of Property Owners within 200 feet, dated October 10, 2025.
- G. Borough of Somerville Certified List of Property Owners within 200 feet, dated October 19, 2025.
- H. Cover Letter entitled “Re: Raritan Mall Urban Renewal, 166 Orlando Drive, Raritan New Jersey, Block 116.01, Lot 11.01, Application for Preliminary and Final Major Site Plan with Bulk Variance Relief”, prepared by John P. Miller (Applicant’s Attorney), dated October 23, 2025.
- I. Somerset County Planning Board – Land Development Application Form Checklist & Review Fee Schedule and Completeness Checklist.
- J. Report entitled “Flood Hazard Area Control Act Rules, Raritan Lofts, Block 116.01, Block 11.01, Borough of Raritan, Somerset County, New Jersey”, prepared by Eric L. Keller PE, dated February 28, 2023.
- K. Site plan entitled “Preliminary and Final Major Site Plan, Raritan Lofts, Block 116.01, Lot 11.01, Borough of Raritan, Somerset County, New Jersey”, prepared by Eric L. Keller PE, dated October 10, 2025, consisting of 15 sheets.
- L. Architectural plans entitled “Raritan Mall LLC, Borough of Raritan, Somerset County, New Jersey”, prepared by Devereaux & Associates, dated September 25, 2025, consisting of 11 sheets.

OFFICE LOCATIONS

www.vancleefengineering.com

Lebanon, NJ 908-735-9500	Hamilton, NJ 609-689-1100	Toms River, NJ 732-573-0490	Freehold, NJ 732-303-8700	Bethlehem, PA 610-332-1772
Hillsborough, NJ 908-359-8291	Mt. Arlington, NJ 862-284-1100	Phillipsburg, NJ 908-454-3080	Doylestown, PA 215-345-1876	Leesport, PA 610-670-6630

I. **Project Summary:**

A. **Project History**

On June 21, 2022, the Borough of Raritan's Mayor and Council adopted Resolution 2022-06-100, granting authorization for the Planning Board to conduct a preliminary investigation to determine whether Block 116.01, Lot 11.01 qualifies as an area in need of redevelopment. The Borough of Raritan Planning Board subsequently directed the Borough Planner Van Cleef Engineering Associates to conduct this study.

On October 26, 2022, the Borough of Raritan Planning Board adopted Resolution PB 22-14, confirming that Block 116.01, Lot 11.01 met the criteria to be designated an area in need of redevelopment, and thus recommended this determination to the Borough Council.

On November 14, 2022, the Borough of Raritan Council approved the determination made by the Planning Board, officially declaring the area in need of redevelopment pursuant to N.J.S.A. 40A:12A-6 by adopting Resolution No. 2022-11-176.

An amended and restated designation Resolution was adopted by the Mayor and Borough Council on February 6, 2024, directing Van Cleef Engineering Associates to prepare a redevelopment plan for the tract pursuant to the LRHL at N.J.S.A 40A: 12A-7. This was labeled a Resolution 2024-02-040.

In April of 2024, Van Cleef Engineering Associates finalized the Redevelopment Plan prepared for Block 116.01, Lot 11.01, which was subsequently adopted by Council.

On October 23, 2025, the Applicant submitted a preliminary and final site plan application package to the Borough. The Borough subsequently directed this office to conduct an initial completeness review of the application.

B. **Project Description**

This application is for Preliminary and Final Site Plan approval of a mixed-use building located at Block 116.01, Lot 11.01, also known as 166 Orlando Drive, Borough of Raritan, New Jersey. The proposed structure will contain 276 residential units, of which will be rented and not owned. The structure will contain 5 floors, and be approximately 70-feet in height. Each floor will contain 69 residential units. In total 234 units will be market rate units, and 42 units will be affordable housing units. Since the tract has been designated as a redevelopment area, the tract is bound to the zoning schedule outlined in the Raritan Mall Redevelopment Plan. Formerly the tract was located within the Borough's B-2, Shopping Center District.

Block 116.01, Lot 11.01 is currently occupied by a one-story mall structure spanning the eastern and northern property line of the tract. On the western property line of the tract, there is a one-story commercial structure. Currently, the tract is accessed through two drives on Orlando Drive. The existing mall is fronted by a concrete sidewalk, lined with concrete curbing. Remaining space within the tract primarily consists of an expansive asphalt parking area. Throughout the parking area, there are concrete curb islands, containing remnants of vegetation and rock. The parking area is currently striped; however the striping is faded and in need of repair. The asphalt parking area itself is in poor condition, containing large pavement sections that have since failed, resulting in potholes. The one-story commercial building to the west is also encompassed by a concrete sidewalk, lined with concrete curbing. Asphalt parking areas surrounding the commercial structure are in good condition, and do not demonstrate a need for repair.

The Applicant is proposing to demolish the existing one-story mall, along with the surrounding curb and sidewalk. All existing curb islands, lighting, and pavement will be removed. Pavement in good condition will remain, primarily in areas located around the existing commercial structure. However, the striping will be removed in these locations in order to be reorientated during construction. The commercial structure is to remain and be renovated. Upon completion of demolition, the Applicant proposes to construct a mixed-use, multi-family residential structure on the eastern and northern portion(s) of the tract. As noted above, the structure will contain 5 floors, and be approximately 70-feet in height. Floor(s) 2-5 will each contain 69 residential units. In total 234 units will be market rate units, and 42 units will be affordable housing units.

First floor uses of the proposed structure will consist of a parking facility, lobby area, and 20,000 square feet of retail space. The building will be fronted by a concrete walkway, consisting of ADA complaint curb ramps providing access to the proposed asphalt parking area(s). The parking area(s) will consist of 647 parking spaces in total. This includes spaces dedicated for handicap parking and electric vehicle charging. Additional improvements to the parking area include new concrete curbing, curb islands, striping, lighting, landscaping, and Type-B inlet installation for collection of stormwater. Areas in which the existing pavement is scheduled to remain will be restriped. Further improvements within the tract include additional landscaping, stormwater improvements, retaining walls, curbing, lighting, signage, and a court game within the eastern side yard.

II. Completeness Review

The Applicant has submitted this application for preliminary major site plan Approval. Based upon review of the provided documentation and checklists, it is the recommendation of this office that the Board deem this application **conditionally complete** based on the following commentary:

1. Preliminary Site Plan Checklist

- a. §207-47.B(5)(4) – Application fee, executed escrow agreement and appropriate review fee.
Verification Required – Applicant did not provide proof of fees or escrow payments made to this office. The Borough of Raritan shall provide verification.
- b. §207-47.B(5)(10) – Map scale not less than 1-inch equals 100 feet, showing the entire tract on one sheet, using 1 of 4 standard sheet sizes: 8 ½ x 11, 15 x 21, 24 x 36,; or 30 x 42 inches per ordinance.
Temporary Waiver Required – Applicant has provided a key map at a scale of 1-inch equals 200 feet. Applicant shall revise the key map on Sheet 2 of the site plan to be at a scale no less than 1-inch equals 100 feet.
- c. §207-47.B(5)(9) – Certification that the Applicant is owner or authorized agent, or consent of owner to file application.
Verification Required – Applicant has not provided such documentation to this office.
- d. §207-47.B(5)(21) – Location, use, and ground floor area of all existing and proposed buildings or structures and all accessory buildings or structures, with setbacks, sideline and rear line distances, and finished grades at all corners.
Temporary Waiver Required – The utility plan shall be revised to identify the type of catch basin(s) proposed, along with size of existing and proposed utility lines.
- e. §207-47.B(5)(25) – Location, type and size of all existing and proposed catch basins, storm drainage facilities and utilities per ordinance.
Temporary Waiver Required – Applicant has submitted a site plan to this office that does not contain a utility plan (Sheet 7). A utility plan shall be provided, identifying the type of catch basin(s) proposed, along with the location and size of proposed utility lines.
- f. §207-47.B(5)(31) – The nature and location of public and private utilities, including maintenance and solid waste disposal, and/or storage facilities.
Testimony Required –Applicant shall provide testimony to the method in which waste will be collected within the tract. Currently, there is no proposed trash enclosure within the project limits.

- g. §207-47.B(5)(33) – Cost estimates of all on-site improvements.

Temporary Waiver Required – An engineer’s estimate is required for the Borough Engineer to determine the performance guarantee the Applicant must post to the Borough. Therefore, the Applicant shall provide such an estimate prior to final approval.

2. Final Site Plan Checklist

- a. §207-47.B(6)(4) – Application fee, executed escrow agreement and appropriate review fee.

Verification Required – Applicant did not provide proof of fees or escrow payments made to this office. The Borough of Raritan shall provide verification.

- b. §207-47.B(6)(10) – Map scale not less than 1-inch equals 100 feet, showing the entire tract on one sheet, using 1 of 4 standard sheet sizes: 8 ½ x 11, 15 x 21, 24 x 36,; or 30 x 42 inches per ordinance.

Temporary Waiver Required – Applicant has provided a key map at a scale of 1-inch equals 200 feet. Applicant shall revise the key map on Sheet 2 of the site plan to be at a scale no less than 1-inch equals 100 feet.

- c. §207-47.B(6)(9) – Certification that the Applicant is owner or authorized agent, or consent of owner to file application.

Verification Required – Applicant has not provided such documentation to this office.

- d. §207-47.B(6)(21) – Location, use, and ground floor area of all existing and proposed buildings or structures and all accessory buildings or structures, with setbacks, sideline and rear line distances, and finished grades at all corners.

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- f. §207-47.B(6)(31) – The nature and location of public and private utilities, including maintenance and solid waste disposal, and/or storage facilities.

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- g. §207-47.B(6)(33) – Cost estimates of all on-site improvements.

Temporary Waiver Required – An engineer’s estimate is required for the Borough Engineer to determine the performance guarantee the Applicant must post to the Borough. Therefore, the Applicant shall provide such an estimate prior to final approval.

III. Zoning Review:

All municipalities in the State of New Jersey have active zoning codes effectuated by their Land Use Plans, an element of each municipality’s Master Plan. These zoning codes provide legally enforceable, standardized schedules of bulk requirements, outlining the maximum and minimum distances from lot lines, percentage of impervious coverage, and other various attributes of each parcel based on the location of that parcel within the municipality. This also includes permitted, conditional, accessory and prohibited uses. Strict adherence to this code is required.

However, pursuant to the Municipal Land Use Law (M.L.U.L.)’s, N.J.S.A. 40:55D-70, the Board of Adjustment may: “a. Hear and decide appeals where it is alleged by the appellant that there is error, in any order, requirement, decision or refusal made by an administrative officer based on or made in the enforcement of the zoning ordinance;” and “b. Hear and decide requests for interpretation of the zoning map or ordinance or for decisions upon other special questions upon which such board is authorized to pass by any zoning or official map ordinance...”

As such, the Applicant has requested variances in accordance with N.J.S.A. 40:55D-70. The following table summarizes the existing and proposed conditions juxtaposed to the permissions and allowances (requirements) of the zoning code:

Block 116.01, Lot 11.01 (Raritan Mall Redevelopment)

Description	Permitted	Existing	Proposed	Comment
Max Building Height – Stories	5 stories	4 stories	5 stories	Complies
Max Building Height – Feet	70 ft.	60 ft.	70 ft.	Complies
Max. Impervious Coverage	80%	94%	72%	Complies
Setback – Route 206	50 ft.	67.3 ft.	50.7 ft.	Complies
Setback – Orlando Drive	10 ft.	6.3 ft.	50 ft.	Complies
Setback – Busky lane	10 ft.	29.8 ft.	50 ft.	Complies
Setback – Rear Yard	5 ft.	8.6 ft.	37.5 ft	Complies
Setback – Accessory Structure	5 ft.	N/A	N/A	N/A

Please note that existing non-conformities that require a variance have been identified in this report for proper recordkeeping. This enables the Board to formally acknowledge the site in its current configuration regardless of any prior records of approval, existing or alleged. Any future applications on the subject parcel will be able to reference this document, at this point, as fully compliant.

Upon the Board the application complete, this office will finalize its review of all variances required for the subject minor site plan. Applicant should be prepared to provide testimony as noted above for all variances required.

1. Bulk Schedule (C Variance):

The provided application in its current configuration does not require any bulk relief. Should there be a need for revisions/reconfiguration of the site plan based on future testimony, resulting in a variance, this section of the report will be revised to identify such requirements.

2. Permitted Principle Uses (D Variance):

Applicant is proposing the construction of a multi-use building, primarily serving a residential use, but also offering 20,000 square feet of retail space. Mixed use residential and commercial complexes are a permitted use within the redevelopment plan area. Therefore, there are no use variances required in connection with the subject application.

3. Design Waivers:

a. Parking Quantity per approved Redevelopment Plan

Variance Required – The Redevelopment Plan establishes a parking requirement in accordance with the most recent RSIS standards, which may be reduce to no less than a total of; 1.8 spaces per one-bedroom unit, 2 spaces per two-bedroom unit, and 1 parking space per 75 square feet of retail space. This equates to a total parking requirement of 961 spaces for the Applicant. Applying the credit the Applicant receives for installation of EV charging stations, the total requirement falls to 909 parking spaces. Currently, the Applicant is proposing a total of 647 parking spaces, a deficit of 262 parking spaces. As a result of this parking deficit, a variance is required.

IV. Technical Review:

1. Preliminary Technical Review Comments

- a. Applicant shall be prepared to provide testimony to the general drainage conditions within the tract. Further, Applicant shall provide testimony to the proposed stormwater conveyance system, and its ability to satisfy the demand of stormwater runoff within the tract without the assistance of additional BMPs such as seepage pits. Applicant shall provide a stormwater management report in accordance with N.J.A.C 7:8.
- b. Applicant shall provide testimony to the circulation within the tract. Specifically, if and where a trash truck will enter and exit the site in order to collect waste. The site plan shall be updated with a circulation plan containing traffic flow arrows, reflective of the provided testimony.

2. Redevelopment Plan Design Standards

The following comments are taken directly from the Raritan Mall Redevelopment Plan, dated March 2024, with excerpts *italicized in light grey* and technical comments associated **bolded in black**.

a. Redevelopment Plan Goals and Objectives:

1. *Enact such elements and controls that will allow for the redevelopment of lands within the Plan Area consistent with the purpose of this Redevelopment Plan.*
(2026-01-16) Complies – Applicant has provided a site plan for the construction of a multi-use building with additional site improvements. The building will serve both residential and commercial (retail) uses. This proposal is consistent with the purpose of the approved Redevelopment Plan.
2. *Provide for appropriate land uses that will promote economic development and growth opportunities and serve the need of the community.*
(2026-01-16) Complies – Applicant is proposing the construction of 276 residential housing units, 42 of which will be affordable units. The Applicant will also construct a 20,000 square foot retail space on the first floor of the proposed structure. Construction of housing units in close proximity to downtown Raritan will generate an economic boost to local businesses.
3. *Capitalize on the existing strengths of the Plan Area, including its location proximate to Downtown Raritan, the Raritan River, Duke Farms, NJ Transit Rail Station and Route 206.*
(2026-01-16) Testimony Required – Applicant shall state the methods being employed to capitalize on the existing strengths of the Plan Area and its surrounding amenities.

4. *Establish Redevelopment Plan elements and controls that allow for development consistent with smart growth principles.*
(2026-01-16) Testimony Required – Applicant has incorporated several features within the site plan that align with smart growth principles. Applicant is proposing construction of electric vehicle charging stations, and a bicycle storage room. Green mode of transportation are a pillar of smart growth initiatives. Furthermore, the Applicant is reducing the existing impervious coverage within the tract, creating more open green space and planting beds. The site is also located within a walkable neighborhood, containing a sidewalk network that leads directly to downtown Raritan. Testimony shall be provided to any additional smart growth principles that will be implemented throughout the tract.
 5. *Integrate development into surrounding neighborhoods by encouraging aesthetically appropriate buildings and site design that complements the existing residential development and improves the pedestrian environment and public space for residents of the community.*
(2026-01-16) Complies – The site improvements proposed by the Applicant are aesthetically beneficial to the surrounding residential areas and the community as a whole.
 6. *Coordinate redevelopment efforts for the entire Plan Area to minimize disruption of the adjacent community during construction activities.*
(2026-01-16) Testimony Required – Applicant shall describe the methods that will be taken in order to mitigate disturbance to adjacent residential neighborhoods during construction.
 7. *Develop affordable housing units in compliance with the New Jersey Housing and Fair Share Plan.*
(2026-01-16) Complies – Applicant is proposing affordable housing units in compliance with the New Jersey Housing and fair Share Plan. In total, 276 housing units are proposed. Of these units, 42 are scheduled to be affordable units. Applicant proposes eight one (1) bedroom affordable units, 24 two (2) bedroom affordable units, and 10 three (3) bedroom units.
- b. Land Uses – The following restrictions exist for residential dwellings:
1. *Dwelling units shall be limited to one-bedroom and two-bedroom units, except that three-bedroom units shall be permitted as required by any applicable state laws, rules, or governing affordable housing, including UHAC.*
(2026-01-16) Complies – All three-bedroom units proposed by the Applicant are scheduled to be low- or moderate-income units. In total 10 units are proposed, 5 moderate income units, and 5 low-income units. Otherwise the plans are compliant.
 2. *No more than 70 percent of the dwelling units shall be two-bedroom units and at least 30% shall be one-bedroom units. This regulation applies to market rate units only. All required affordable housing units shall follow UHAC requirements.*
(2026-01-16) Complies – Applicant is proposing that 63.25% of the units will be one-bedroom units, and 36.75% will be two-bedroom units.
 3. *The minimum unit size for market rate dwelling units shall be 750 square feet for one-bedroom units and 1100 square feet for two-bedroom units.*
(2026-01-16) Complies – No one-bedroom unit is proposed to consist of less than 750 square feet, and no two-bedroom unit will consist of less than 1,100 square feet.

4. *A central lobby shall be provided for any building containing multi-family residential units.*
(2026-01-16) Complies – Applicant is proposing the construction of a central lobby on the first floor of the building.
 5. *No residential use is permitted within 200 feet of the Route 206 Right-of-Way.*
(2026-01-16) Complies – No residential use is proposed within 200 feet of the Route 206 ROW.
- c. Land Uses – The following accessory uses are permitted:
1. *Off-street parking, including structured parking for the exclusive use of the residents and their guests.*
(2026-01-16) Complies – Off-street parking is provided for residents and the proposed retail space. In total, 647 off-street parking spaces are proposed, including handicap and electric vehicle charging designated spaces.
 2. *Off street loading.*
(2026-01-16) Complies – Applicant is proposing a space dedicated for off street loading in the rear of the proposed building.
 3. *Electric vehicle supply and service equipment (ESVE) and make-ready parking spaces pursuant to P.L. 2021, c.171.*
(2026-01-16) Complies – Applicant is proposing designated electric vehicle charging spaces.
 4. *Management office not to exceed 2,000 square feet.*
(2026-01-16) Complies – Applicant is proposing a management office that is approximately 336 square feet and contains additional amenities not exceeding 2,000 square feet on the first floor.
 5. *Customary accessory uses for the benefit of the residents, such as fitness rooms, community rooms and laundry rooms, located within residential building, provided they are in the same structure as the residential dwelling units and not to exceed 4,000 square feet.*
(2026-01-16) Complies – Applicant is proposing several amenities for residents including a conference room, fitness center, game room, mail room, package room, and café space on the first floor alongside a management office.
 6. *Signs conforming with the requirements of this plan.*
(2026-01-16) Complies – Applicant is proposing the installation of flood warning signage in addition to all other required signage.
- d. Affordable Housing
1. *The Borough of Raritan adopted a Fair Share Plan that was prepared in February 2022 which includes a Housing Plan. Part of this Fair Share and Housing Plan was a requirement that was adopted to the Land Use and Development Regulations as per Ord. No. 2022-06. This inclusion is know as the Borough’s Mandatory Affordable Housing Set-Aside Ordinance (§207-90.3). All housing included as part of this project must comply with that ordinance, which at the time of this Redevelopment Plan requires provisions that at least 15% of the rental housing stock and 20% of the purchasable housing stock be affordable units.*
(2026-01-16) Complies – All of the residential units constructed will be rentals. In total, the Applicant is proposing to construct 276 units. Of these units, 42 will be designated for affordable housing. This equates to 15% of the rental housing stock, as required through Borough of Raritan Municipal Code §207-90.3.

e. Architectural Regulations

1. *All buildings shall be constructed of high-quality materials. Preferred primary materials for all building facades are stone; masonry; brick; wood; stucco (except EIFS is not allowed); Hardie panels or similar fiber cement siding; Trespas ventilated façade system, Meteon panels and similar high-pressure compact laminate/cladding panels; precast and cast stone, stone, and masonry; glass; and cast iron, steel, aluminum, and other types of metal. No more than three different primary materials should be used on building facades. Within the primary materials, variations in color, textures and pattern may be employed to further break up the bulk or mass of the building. Materials should be extended around corners and extensions in order to avoid a “pasted on” appearance. All building facades adjacent to or visible from public streets or railroad, walkway or open space should exhibit the same degree of architectural detailing as the building’s primary façade. Any mechanical equipment above the roofline shall be screened or painted.*

(2026-01-16) Complies – Applicant is proposing that the building façade be primarily constructed of brick, along with three (3) different types of siding. The building roof will be constructed of a combination of shingles and matte black metal roofing. It is the opinion of this office that the proposed building appearance and material schedule is in accordance with the redevelopment plan. However, it is recommended that the Applicant provide samples of the proposed roofing and siding to the Board for comment prior to final approval.

f. Lighting

1. *Adequate lighting shall be provided for all parking areas and pedestrian walkways. Lighting shall be designated to provide for safe movement of pedestrians and vehicles and provide security lighting to illuminate all building entry points and other areas as required by the Planning Board. All outdoor lighting shall be downcast and illuminate only the intended areas. A lighting plan shall be provided as part of the design plans showing that the lighting levels at the perimeter of the Plan Area are acceptable.*

(2026-01-16) Testimony Required - Applicant shall provide testimony to the lighting plan submitted to this office. It is identified that there will be light spillage onto the adjacent tract(s) to the north in excess of 0.5 footcandles in various locations. The Borough of Raritan Municipal Code §207-64.F.13 requires for residential lighting standards that “At all property lines, the level of light shall not exceed 0.5 footcandle.” It should be noted that the redevelopment tract borders the Borough of Raritan R-3 Residential Zone to north. Therefore, it is imperative that light trespass be kept at a minimum in order to mitigate disturbance to residents. While it is acknowledged that adjacent Block 116.01, Lot 26 is currently vacant of a structure, this standard should be upheld due to the potential for future residential development of the tract. It should be noted by the Applicant that an as-built lighting plan with confirmed illuminance shall be provided prior to issuance of any Certificate of Occupancy post construction.

g. Parking

1. *Parking shall be provided in accordance with RSIS standards and may be reduced to no less than the following; 1.8 Spaces per one-bedroom unit, 2 spaces per two-bedroom unit, 1 parking space per 75 square feet of retail space. Off street parking shall be permitted anywhere within the Plan Area, including within buildings, provided a 5' buffer to all property lines is respected, and when abutting solely residential uses, shielded visually with either fencing, decorative walls, or landscaping. Surface parking shall have landscaped islands so as to break up long aisles and to provide shade. One or more loading spaces shall be provided for buildings containing multi-family dwellings. Such space(s) shall be adequate to accommodate moving and delivery trucks. Easements and/or portions of parking provided with the time restrictions shall be permitted to meet the loading requirement. All parking within the Plan Area must be accompanied by a "High and Dry" Access Easement, which provides direct unencumbered egress during flood conditions which may require a route through adjacent properties.*

(2026-01-16) Testimony Required - The Redevelopment Plan establishes a parking requirement in accordance with the most recent RSIS standards, which may be reduce to no less than a total of; 1.8 spaces per one-bedroom unit, 2 spaces per two-bedroom unit, and 1 parking space per 75 square feet of retail space. This equates to a total parking requirement of 961 spaces for the Applicant. Applying the credit the Applicant receives for installation of EV charging stations, the total requirement summates to 909 parking spaces. Currently, the Applicant is proposing a total of 647 parking spaces, a deficit of 262 parking spaces. As a result of this parking deficit, relief would be required. Testimony should be provided to the proposed parking configuration and its ability to serve the tract.

h. Sustainable Design

1. *Building and site design in the plan area shall seek to minimize environmental damage, strain on municipal utilities and impact on adjacent uses. Broadly speaking, green building design goals include reduced energy and water use; use of sustainable, renewable, non-toxic, and locally produced materials; improved indoor air quality; and environmentally conscious site planning. Development should aim to meet the United States Green Building Council's Leadership in Energy and Environmental Design (LEED) requirements for green building design or similar certification programs. These requirements include, but are not limited to, green building design goals that promote reduced water use; use of sustainable, renewable, non-toxic, and locally produced materials; improved indoor air quality; and environmentally conscious site planning. Formal certification is encouraged but not required.*

(2026-01-16) Testimony Required – Applicant shall provide testimony to methods of green building design that will be incorporated into the principle mixed use structure. It is acknowledges that the impervious coverage has been reduced and upgraded stormwater management infrastructure is being proposed.

i. Utilities

1. *All new utility distribution lines and utility service connections from such lines to buildings in the Plan Area shall be located underground. To the extent possible, existing utility lines should also be relocated underground. Locations for utility lines and easements shall be established at the time of Planning Board Site Plan Review and approval. Utility lines and locations may be relocated pursuant to individual utility company requirements at any time. The redeveloper is responsible for improving on-site utility infrastructure to support the proposed land uses. Water and sanitary sewer capacity calculations should be shown on site plans.*

(2026-01-16) Outstanding – Applicant is proposing that all new utility lines be constructed under-ground in compliance with the redevelopment plan. However, Applicant did not provide any water and sanitary sewer capacity calculations on the provided site plan. All sewer connections shall be coordinated directly with the Borough Engineer on Busky Lane.

3. Site Plan Review Comments

- a. Within sheet 4 of the provided site plan, the Applicant indicates existing pavement is to remain within the areas of the proposed sawcut limits. The majority of asphalt pavement that is scheduled to remain is located around the existing 1-story commercial building. It is the opinion of this office that the pavement conditions in this location mirror those of the remaining asphalt areas scheduled to be removed. Within the identified pavement preservation limits there are clear signs of alligator cracking, pavement joint failure, and depressions indicating base failure. On-site conditions also show various potholes, and vegetation growing between surface cracks. Due to these conditions, it is highly recommended by this office that no pavement areas within the tract be preserved. All asphalt should be milled off and subsequently replaced, with base repair, if necessary, performed.
- b. Applicant has provided an ADA grading plan, demonstrating that pavement areas surrounding the ADA parking spaces do not exceed 2% in any direction. However, the Applicant has not provided any spot grading for the proposed ADA curb ramps that provide access to the sidewalk network fronting the proposed mixed-use building, and in other locations throughout the tract. Grading of the concrete curb ramps shall be shown in order to ensure compliance with the most recent ADA regulations established by the NJDOT for sidewalk construction. Regulations state that complaint curb ramps shall have flush and depressed curbing, a slope no greater than 7.5%, and feature a landing/turning area not to exceed a max of 2%. At the base of the curb ramps, the Applicant shall also install the required detectable warning surfaces. The remaining sidewalk throughout the tract shall be installed 4" thick, with a cross slope of 1.5-2%. The ADA plan (sheet 6) shall be revised to demonstrate complaint grading at all proposed curb ramps throughout the tract.
- c. The curbing and sidewalk encompassing the existing 1-story commercial structure is scheduled to remain. Concrete curb in this location appears to be worn, cracked, and chipped in multiple areas. The adjoining concrete sidewalk in this location has several trip hazards, as several slabs have depressed or risen overtime. Further, the concrete curb ramp in this location is not ADA compliant, and does not contain a detectable warning surface. It is the opinion of this office that the concrete curbing and sidewalk in this location be removed and properly replaced. Applicant shall provide spot elevations to ensure proper grading of the ADA curb ramp.
- d. It is strongly advised that the Applicant provide an ADA network map showing an ADA compliant route from the various entrance points of the building to the surrounding sidewalk network abutting the property.

- e. Testimony shall be provided to the dimensions of the parking stalls. Applicant is proposing the construction of 647 parking spaces, each to have a dimension of 9' x 18'. The Borough of Raritan Municipal Code states that *"A parking space shall be a rectangular space measuring nine feet in width and 20 feet in length, with an area of not less than 180 square feet per vehicle, exclusive of access drives or aisles; provided, however, that a longitudinal (end-to-end) parking space shall be 10 feet wide and 25 feet long, with an area of not less than 250 square feet, exclusive of access drives or aisles."*
- f. Applicant is proposing to install a fire lane in the rear of the structure along the northern property line. Signage shall be accompanied by the appropriate striping as per §82-6 of the Borough of Raritan Municipal Code. *"The owner(s) of any property designated in Schedule I shall mark the fire lane(s) described in that schedule by providing signs constructed of metal with raised red letters a minimum of two inches in size on a white background with the words NO STANDING OR STOPPING — FIRE LANES. Spacing of the signs shall be a minimum of one sign for every 100 feet of fire lane or part thereof. The area of the fire lane shall be delineated with yellow lines four inches in width which contain the marking indicating NO STANDING OR STOPPING — FIRE LANE in yellow letters at least 18 inches in height. The inside of the fire lane shall be further marked with diagonal-striped, yellow lines four inches in width spaced at intervals of five feet. If a designated fire lane abuts a curb, such curbing shall be yellow in color as to designate it as part of the fire lane. The costs associated with performing the above-mentioned work to comply with this section shall be the responsibility of the property owner or business owner."* The site plan shall be revised to reflect this requirement.
- g. Borough of Raritan Municipal Code §207-64 requires a loading zone to be a minimum of 12 feet wide. Currently, the Applicant is proposing a loading zone width of only 10 feet. *"In all zone districts, for every building or part thereof hereafter erected which is to be occupied for manufacturing, storage, display of goods, a retail store, wholesale store or warehouse, market, hospital for humans, laundry, dry-cleaning establishment, or other use similarly requiring the receipt or distribution in vehicles of materials or merchandise, except those in the B-1 Zone, there shall be provided and maintained on the same premises with such use at least one off-street loading space which shall be at least 12 feet wide, 40 feet long and have a fourteen-foot overhead clearance. A loading space shall only be permitted in a side or rear yard, and no part of such space shall be nearer than 25 feet to any property line."* Furthermore, directly adjacent to the proposed loading zone, the Applicant is designating a 20-foot-wide fire lane. If the loading zone is revised to the proper width of 12 feet, the fire lane will be reduced to 18 feet. Testimony shall be provided to the frequency in which the loading zone will be occupied. It is the opinion of this office that in the event of a fire emergency, vehicles parked in the loading zone may interfere with fire trucks trying to access this lane. The fire lane width and configuration shall be reviewed for practicality by the Borough Fire Marshall prior to approval.
- h. Applicant shall provide testimony to the manner in which waste will be collected and removed from the site. Within the site plan submitted to this office, the Applicant does not identify the proposed location for trash collection. The site plan shall be updated to reflect this testimony, and it should be demonstrated that a trash truck can efficiently circulate the tract to collect waste without any conflict. Further, the Applicant shall provide a trash enclosure detail containing a ADA accessible latch if required.

- i. Applicant shall revise the site plan to identify the elevation at the top and bottom of the proposed retaining walls to ensure proper construction. The modular block wall construction detail shall be updated to include the installation of a 4" diameter drainage pipe behind the wall. Installation of a drainage pipe behind the block wall will prevent soil erosion, and the accumulation of water and its resulting pressure build up. Such drainage pipes should be connected to the proposed stormwater network and shown on the utility plans for clarity.
- j. Applicant shall provide a trench restoration detail with the appropriate dimensions for backfilling, as required by the Borough of Raritan Municipal Code. It is imperative to ensure proper restoration of trenches made within the Borough of Raritan right-of-way during utility work to prevent future pavement failure.
- k. It is further recommended by this office that the Applicant mill and pave Busky Lane, due to the additional disturbance that will occur during utility service capping and connection. This will also provide an elevated visual appearance to the area adjacent to the redevelopment tract which is in alignment with Redevelopment Plan Goal 5: *"Integrate development into surrounding neighborhoods by encouraging aesthetically appropriate buildings and site design that complements the existing residential development and improves the pedestrian environment and public space for residents of the community."*
- l. Applicant shall provide spot elevations at the corners of the entry/exit drives where the proposed asphalt will meet the existing pavement on Orlando Drive. This will ensure that there is a flush connection between the existing roadway and entry/exit drive following construction.
- m. All proposed striping shall be constructed of long-life thermoplastic, and shall be noted as such on the construction details.
- n. It should be noted by the Board that the subject tract will have a permitted multifamily residential use bordering the Borough of Raritan R-3 Residential Zone to the north (Block 26, Lot 116.01 & surrounding neighborhood). The Borough of Raritan Municipal Code §207-67.B requires that a landscape buffer be provided when such a tract abuts a residential zone, or is visible from an immediately adjacent residential zone. *"Buffering. When any business, commercial or industrial building or other nonresidential use or any multifamily residential use, including but not limited to off-street parking areas, occupies a lot in any district as permitted by this chapter and such lot abuts upon a residential zone or is visible from an immediately adjacent residential zone, a buffer shall be provided in accordance with the requirements below. Compliance with this provision shall be required for any changes to an existing lot or structure requiring site plan approval."* It is acknowledged by this office that there is a waterline easement along the northern property line. However, due to the nature and size of this development, the Applicant should provide some level of year-round screening/buffering. Applicant shall provide testimony.
- o. Applicant shall ensure that the concrete court game area is constructed to be four (4) inches thick, and graded at a slope of at least 1% in order to ensure proper drainage and negate potential ponding of stormwater. The Applicant shall provide spot elevations at the corners of the concrete slab to ensure a proper pitch is obtained. It is further recommended by this office that the Applicant install a concrete sidewalk from the court game to the proposed concrete patio adjacent to the building. This will allow pedestrians who utilize wheel chairs to have access to the court. Sidewalk in this location shall have a cross slope no more than 1.5%.
- p. Applicant shall ensure that the contractor performs test pits in locations where proposed storm pipe will cross the existing sanitary sewer line scheduled to remain. Test pits will verify the depth of the existing service, mitigating the potential conflicts during installation.

- q. Applicant shall provide testimony to the removal of any vegetation within the tract. Any trees to be removed of a caliper greater than 6" shall be identified on the site preparation plan and replaced in accordance with the §315, Article XII Tree Removal-Replacement Ordinance.
 - r. Applicant shall revise the zoning table provided on Sheet 2 of the site plan. Both the permitted and proposed maximum building height are identified to be 80 feet by the Applicant. This should be revised to state that the permitted and proposed maximum building height is 70 feet above the flood hazard area level at elevation 51.95. Provided architectural renderings identify the proposed building height to be compliant at 70 feet. This error shall be revised for the purpose of proper record keeping and to ensure proper compliance.
4. Environmental/Engineering Report Review Comments
- a. Applicant shall provide testimony to the expected volume of sewage and wastewater that will be generated by the proposed development. This information is not provided in the environmental impact statement received by this office, whereas it is required. Borough of Raritan Municipal Code §207-69.C.2.c requires that an environmental impact statement shall identify *“Wastewater management. An estimate the expected flow of sewage, process water and/or other wastewater expected from the proposed development.”*
 - b. Applicant shall obtain a certificate of adequacy for the proposed water supply from the NJDEP in accordance with Borough of Raritan Municipal Code §207-69.C.2.d.2 which requires that *“If the plan includes 50 or more dwelling units, certification of the adequacy of the proposed water supply and sewage facilities shall be obtained from the New Jersey Department of Environmental Protection and included in the EIS.”*
 - c. Applicant shall provide general testimony to stormwater management on site. In particular, it is noted that the stormwater analysis provided in the Engineering Report is dated prior to that of the plans. The date of the stormwater design should be coordinated to the date of the design on the site plans. This discrepancy, if present, should be discussed and elaborated upon.
 - d. Applicant shall provide testimony to the anticipated volume of solid waste that will be generated within the tract, the environmental impact statement shall be revised to reflect the given testimony. Borough Raritan Municipal Code §207-69.C.2.g requires an environmental impact statement from the Applicant containing *“Solid waste, recycling and disposal. Estimate the volume of solid wastes, by type, expected to be generated from the proposed project during construction and operation and describe plans for recycling, collection, transportation and disposal of these materials. Discuss the recycling plan for the proposed project and its implementation. Identify the location(s), type(s) and owner(s) of the facility (facilities) which will receive such solid wastes. If the facility is a landfill, submit proof that it is registered with the Division of Environmental Protection and is operated in compliance with the New Jersey Sanitation Code.”*
 - e. Applicant has not provided traffic calculations within the environmental impact statement. The Borough of Raritan Municipal Code §207-69.C.2.i requires that the Applicant *“Traffic/parking. Describe the number of cars to be expected and the traffic pattern, including peak traffic, and how it relates to the existing traffic level and traffic patterns on adjacent and other affected roadways. Describe the number of parking spaces to be required by the proposed project and the effect this will have on existing and planned parking facilities. Identify potential existing traffic hazards and whether the project may generate additional hazards for motor vehicles, bicyclists or pedestrians.”* It is the opinion of this office that the required information be provided due to the proposed mixed use of the lot. As a result of this mixed use, traffic will not be solely residential. It should be demonstrated that during peak traffic residential parking and circulation will not be negatively impacted.

- f. It is further recommended that the Applicant prepare a traffic study for the benefit of the parking variance required for the proposed project, or such similar testimony be provided.
 - g. Applicant shall provide testimony to the level of mitigation that will be required within the tract prior to construction. Prior to development of the existing retail center, the site operated as a regional landfill. As a result, soils are contaminated and requiring remediation as indicated by the site's active permit with the NJDEP. It is strongly suggested that the Applicant have their LSRP provide testimony, or such similar report, to the status of the environmental remediation and the current subsurface conditions.
 - h. It has also been noted and observed during the AINR process of this site that there appears to be subsidence on the northerly access driveway of the existing building. It is strongly suggested that the Applicant provide a geotechnical report affirming the bearing capacity of the subsurface conditions for a structure of this size and weight.
5. Architectural Review Comments
- a. Applicant shall provide testimony to the accessibility of the units, specifically stating whether any units are intended to conform with ADA regulations. Additionally testimony should be provided to the nature in which wheelchair accessibility will be provided. This testimony shall be given for both the market rate and affordable units.
 - b. Testimony shall be provided to the size and orientation of the proposed bicycle storage room. The proposed bicycle storage room is shown to consist of 180 square feet. This does not seem sufficient for such a large development. It is recommended that additional bicycle storage for residents be explored. This can include outdoor covered storage.
 - c. Applicant shall provide testimony to the manner in which residents will dispose of waste. It is the assumption of this office that each floor will contain a trash chute that leads to the proposed trash room. Further testimony shall be provided to the size of the trash room, along with methods that will be implemented for odor control.
 - d. The Applicant has submitted front, rear, and side view elevations of the proposed structure. The Applicant proposes a building height of 70 feet, which this office finds to be accurately calculate based off of associated Redevelopment Plan. Testimony should be provided to the height and viewscape of the building as perceived from various vantage points within the Borough, such as the nearby roadway of Glaser Avenue, West Somerset Street, and the Raritan Greenway across Orlando Drive. Renderings may be helpful in communicating these vantages to the Board and public.

We reserve the right to further comment based on Applicant's testimony and future submittals.

If you require additional information or have any questions, please feel free to contact me at my office.

Very truly yours,

Van Cleef Engineering Associates



Joseph A. Brosnan, PE, PP, CME
Borough/Planning Board Engineer

cc: All Board Members, via Board Secretary
Raritan Mall LLC, Applicant (via U.S. Mail: 148 E. 5th Street, Bldg. 7A, Bayonne, NJ, 07002)
John P. Miller, Applicants Attorney (via email: jpmiller@itfirm.law)
Eric L. Keller, Applicant's Engineer (via email: NJ@Bowman.com)

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