

June 17, 2022

Borough of Stratford Joint Land Use Board
307 Union Avenue
Stratford, NJ 08084

Attn: Joint Land Use Board Members

Re: Preliminary and Final Site Plan Review
Atlantic City Electric Company
306 South Atlantic West
Block 69, Lot 10
Review No. 1
Bach Project No. STRATLUB-2022-1

Dear Joint Land Use Board Members:

We have received the following items submitted for the referenced project:

- Borough of Stratford Joint Land Use Board Application Form and associated documents.
- Correspondence from Niall J. O'Brien of Archer Attorneys at Law to Sharon McCart, Joint Land Use Board, Borough of Stratford, dated April 30, 2022.
- Report entitled "Stormwater Management Plan, Atlantic City Electric Stratford Substation Upgrades, 306 South Atlantic West, Borough of Stratford, NJ", prepared by MFS Consulting Engineers and Surveyors, DPC, dated March 25, 2022, no revision.
- Report entitled "Schedule A, Stormwater Maintenance Plan for Atlantic City Electric". *It shall be noted that this document is not dated and does not have a professional title block or signature of the preparer.*
- Drawings entitled "Preliminary & Final Site Plan, Atlantic City Electric Company's Upgrades to Stratford Substation, Block 69, Lot 10, Borough of Stratford, Camden County, New Jersey", prepared by MFS Engineers & Surveyors:

<u>Sheet</u>	<u>Title</u>	<u>Date/Last Revision</u>
C-001	Cover Sheet	8-5-21, 4-22-22
C-100	Existing Conditions Plan	8-5-21, 4-22-22
C-110	Soil Erosion & Sediment Control Plan	8-5-21, 4-22-22
C-111	Soil Erosion & Sediment Control Notes	8-5-21, 4-22-22
C-120	Site Demolition Plan	8-5-21, 4-22-22
C-130	Site Plan	8-5-21, 4-22-22
C-140	Grading & Drainage Plan	8-5-21, 4-22-22
C-150	Lighting Plan	8-5-21, 4-22-22

**Preliminary and Final Site Plan Review
Atlantic City Electric Company
306 South Atlantic West
Block 69, Lot 10
Review No. 1
Bach Project No. STRATLUB-2022-1
June 17, 2022
Page 2 of 10**

C-151	Lighting Details	8-5-21, 4-22-22
C-200	Elevations	8-5-21, 4-22-22
C-500	Civil Details	8-5-21, 4-22-22
C-501	Civil Details	8-5-21, 4-22-22

SITE INFORMATION:

Owner/Applicant: Atlantic City Electric Company
5100 Harding Highway
Mays Landing, NJ 08330
John.declemente@exeloncorp.com

PROJECT SUMMARY:

This application is for improvements associated with the upgrade and replacement of an existing electric substation located on the southwesterly side of West Atlantic Avenue, southeast of Laurel Road.

The property is a 1.47 acre parcel of land located in the Borough's 'I' industrial zoning district and currently contains an existing electric substation and associated site improvements.

The applicant is seeking preliminary and final site plan approval with any associated bulk variances as may be necessary.

COMPLETENESS:

The following items are required as part of a Preliminary Site Plan review per §16.28.040(E) of the Stratford Borough Code.

1. A completed application form and the payment of the application fee. **Provided.**
2. A true and accurate plot plan at a scale of not less than one (1) inch equals fifty (50) feet, or in the case of an area of ten (10) acres or more, the plot plan shall be drawn to a scale of one (1) inch equals one hundred (100) feet. All submissions must be on a uniform sheet size. **Provided.**
3. The zoning classification of the property, the tax plate and block and lot numbers, the tract names and the owner of record as listed in the official tax book. **Provided.**
4. The location of any existing and proposed buildings, structures, open spaces, trees, water bodies, or other natural features on the property in question, and park or recreation areas if the use is residential. **Provided.**

5. Soil conservation service soil classification. *Provided.*
6. Acreage of the tract to the nearest tenth of an acre. *Provided.*
7. Both existing and proposed contours at a two-foot interval maximum; contours should be referenced to United States Geological Survey datum, extended two hundred (200) feet beyond the lot lines. *Provided.*
8. The location of water courses and their extent, surface elevation, depth and their floodplains. *N/A.*
9. All lot lines, setback lines, railroads and their right-of-ways, the location and purpose of any easements, underground or overhead utility lines of any street which abuts the property. *Provided.*
10. A parking schedule in accordance with the zoning ordinance. *Provided.*
11. A parking and circulation plan showing the location and arrangement of vehicular accessways and the location, size and capacity of all parking and loading areas. *Provided.*
12. Landscaping and buffering plan showing what will remain and what will be planted, indicating names of plants and trees and dimensions, approximate time of planting and method of planting (base rooted, ball and burlap). *Provided.*
13. Pavement construction detail. *Provided.*
14. A drainage plan containing the following: *Provided.*
 - a. The size, location and slope of any existing or proposed pipes.
 - b. The size, type, invert elevation and location of any existing or proposed drainage inlets.
 - c. The disposition of all off-site drainage.
 - d. Proposed contours with intervals of one (1) foot where slopes are more than three (3) percent but less than fifteen (15) percent and five (5) feet when fifteen (15) percent or more. The location of any ditches, swales, berms or streams shall also be shown.
 - e. The drainage calculations to substantiate the capacity of the storm drainage system.

15. Existing and proposed curbs, sidewalks and other areas devoted to pedestrian use. **Not provided. Waiver recommended for completeness only.**
16. The buildings front, side and rear elevations and floor plan. **Provided.**
17. Key map showing the location of the site within the borough. **Provided.**
18. The site lighting plan. **Provided.**
19. A copy of any protective covenant or deed restrictions applying to the tract to be developed shall be submitted along with the site plan. **Not provided. Waiver recommended for completeness only.**

The above items noted as "waived for completeness only" have been waived to allow the application to be deemed complete and heard by the Board. All items not waived by the Board must be provided with revised application materials as part of compliance review.

ZONING REQUIREMENTS:

1. The property is located in the 'I' Industrial Zoning District.
2. "Electric Light and Power Companies" are a permitted use in the "I Industrial Zoning District.
3. The property is surrounded to the north by single family homes in the R-1 zoning district, to the east by a church in the R-1 zoning district and to the south and west by commercial properties in the C zoning district.
4. The following table sets forth the bulk standards for the Zoning District and the proposed dimensions and setbacks for the lot:

	Zone 'I' Industrial	Existing	Proposed	Conforms
Min Lot Size (Acre)	1	1.47	1.47	Yes
Min Lot Frontage (ft)	200	225	225	Yes
Min Setbacks (ft)				
Front	50	98	197.6	Yes
Side	20	34.9	45.2	Yes
Side (Aggregate)	50	202.9		
Rear	50	79	56.1	Yes
Max. Building Ht (ft)	40	<40		Yes
Min Residential Buffer (ft)	8		8	Yes

Note: All proposed setback dimensions shown are to the proposed buildings.

5. The Zoning Table shown on the Cover Sheet shall be revised to reflect the correct proposed bulk standards for the site.

PARKING:

1. Per §17.68.020(B), "For any use not listed on the schedule, the developer shall submit an estimate of the parking requirements generated by his use". The applicant has indicated that the substation is an "unmanned" facility and therefore does not require parking for the site.

VARIANCES and WAIVERS:

The following variances and waivers are required for the application:

Bulk Variances:

1. §17.64.020(G) – The applicant is requesting a variance from providing irrigation to the proposed landscape buffer.

Standard of Proof for "C" Variances

The applicant must provide testimony to justify the requested variances. For a C(1) variance, the applicant must demonstrate that the strict application of the zoning regulations to the property create a hardship or result in exceptional practical difficulties by reason of the exceptional shape of the property or the exceptional topographic conditions uniquely affecting the property, or the structures lawfully existing upon the property.

For a C(2) variance the applicant must show that the proposed variance advances the purposes of municipal land use law and that the benefits of the deviation would substantially outweigh any detriments. The applicant should address whether the proposed variance will substantially impair the intent of the Master Plan or zoning plan and whether there are any potential impacts to the public good.

Waivers

1. §15.16.030.A – The applicant is proposing barbed wire atop the proposed perimeter fencing where "The use of barbed wire or wire in which barbs or points are strung, attached or fastened is prohibited".

REVIEW COMMENTS:

MISCELLANEOUS

1. The applicant shall provide all existing and proposed covenants, easements and restrictions (including legal descriptions) and lease agreements for review and approval by this office and the Board Solicitor as a condition of any approvals. Any existing easements as noted in the property title report shall be shown on the plans. Any easements to be extinguished shall be noted on the plans and testimony shall be provided
2. The street names shall be shown on all appropriate plans.
3. The adjacent lot numbers shall be shown on all appropriate plans.
4. The applicant and owner's name shall appear on the Cover Sheet of the plan set.
5. The applicant shall comply with all required affordable housing obligations in accordance with Borough Ordinances.
6. The following note shall be added to the plans per §16.36.170 "No topsoil shall be removed from the site or used as spoil. The applicant shall abide by the provisions of subsection 16.36.100A. Under no circumstances shall any soil or earth be sold or otherwise removed from site, unless application is made and approval granted therefore under the Soil Erosion and Sedimentation Act (Chapter 251, Laws of 1975)".

DEMOLITION PLAN

1. The Demolition Plan shall be revised to be more legible. As shown it is difficult to distinguish all of the existing features to be demolished or removed.

SITE PLAN

1. The plan references "Lease Exhibit for Block 69, Lot 9.01", prepared by Adams, Rehmann & Heggan Associates and dated 5-14-2021. This plan was not part of the application materials provided. This plan in addition to any and all lease documentation shall be provided to our office and the Board Solicitor for review.
2. The plans references plan entitled "General Arrangement" prepared by Sargent & Lundy. This plan was not part of the application materials provide. This plan shall be provided to our office for review.

3. Sight triangles shall be shown on the plan for all egress driveways. Legal Descriptions for any proposed sight triangle easements, if necessary shall be provided for review.
4. Concrete aprons shall be provided for both access drives between the edge of paving along West Atlantic Avenue and extend to the proposed fence line.
5. Concrete sidewalk shall be installed along the entire frontage of the property along West Atlantic Avenue.
6. The proposed fence surrounding the "mobile unit area by others" shall be indicated as temporary fencing and noted as to be removed following construction.
7. Any proposed site signage shall be shown on the plans and shall conform with §17.60.
8. The applicant shall provide testimony regarding trash/recycling storage and collection.
9. The applicant shall provide testimony regarding the type and frequency of deliveries to the site.

UTILITIES

1. No proposed sanitary sewer or water improvements are proposed at the site.

GRADING & DRAINAGE

1. The project consists of more than an acre of land disturbance and is considered a major development. Major developments must meet the latest requirements in NJAC 7:8 and the Borough of Stratford Stormwater Ordinance. The applicant has submitted a stormwater management report.
2. The outfall location as currently designed is unacceptable. As indicated in the submitted stormwater management report, the site historically had stormwater sheet flow from the northern property line to the southern property line. As designed, the proposed stormwater outflow will be concentrated at the proposed outfall structure to a single point which is upstream to the adjacent property's access drive. This will cause an adverse impact of concentrated flow on the adjacent property. The outlet structure shall be relocated to the southerly side of the relocated access drive (with appropriate agreement with adjacent property owner) or an alternate design of stormwater release that would not adversely affect the adjacent downstream property shall be provided.

3. The proposed stormwater management design proposes an infiltration basin to address the NJDEP Stormwater Regulations for stormwater quantity and quality reductions. It shall be noted that according to N.J.A.C. 7:8 Chapter 9.5, "the use of infiltration basins is recommended in this manual only for the water quality design storm or smaller storm events." The applicant must demonstrate what physical constraints prevent the proposed stormwater basin from being utilized as an extended detention basin with connection to offsite storm sewer.
4. The "Grading & Drainage Plan" located in the Post Development Conditions chapter of the Stormwater Management Plan has numerous grades that are denoted as "???" and shall be revised accordingly.
5. The charts in the "Percolation Test Results" chapter of the Stormwater Management Plan incorrectly denotes the unit of measurement for Time as inches. This shall be revised accordingly.
6. The title of the plan located in the Infiltration Test Results chapter of the Stormwater Management Plan should be revised to be the "Test Pit Location Plan" instead of the "Grading & Drainage Plan".
7. The Stormwater Maintenance Plan shall include an example of the inspection logs that will be kept as a part of the plan.
8. The Stormwater Maintenance Plan shall be provided on letterhead of the company preparing the document and contain the signature of a professional engineer.
9. As a condition of approval, the perfected Stormwater Maintenance Plan will be required to be recorded with the Camden County Clerk's office.
10. The grading shall be revised to create a distinct swale along the property line adjacent to Lot 9.01.
11. The bottom of the outlet control structure does not match the invert of the outflow pipe. The applicant's engineer should address how water will be removed from the outlet control structure.

LANDSCAPE & LIGHTING

1. The proposed Emerald Green Arborvitae have a mature width of approximately 3-4' wide but are proposed on the plans at an 8 feet on center spacing. Our office recommends a maximum spacing of 5 feet on center or an alternate species of arborvitae be proposed.

2. As the properties on the northeasterly side of Atlantic Avenue are zoned residential and contain single family homes, the ordinance requires residential buffering. The plans shall provide an eight (8') foot wide residential landscape buffer along the right of way of West Atlantic Avenue between the proposed fence and the right of way line.
3. The Landscape Planting Schedule shall indicate the planting size of the proposed plant material as well as the mature size.
4. The applicant has requested a variance from providing an irrigation system for the proposed landscaping. It shall be noted that the applicant is responsible for the viability of the required buffers and shall replace any plant material if and when it may perish.
5. All site and building mounted lights shall be shielded and provide a downward throw. The LED flood lights as proposed are unacceptable and shall be revised.
6. The height of the proposed building mounted lights shall be noted on the plans.
7. The proposed lighting footcandle shall be 0.00 at the residential property line. The light grid shall be extended to five (5') feet beyond the residential property line to confirm this requirement.

DETAILS

1. The strength of all concrete shall be noted on the details.
2. Our office recommends the 4" DGA on the Gravel Surface Detail be increased to 6".
3. The Detention Basin Section Detail shall be removed from the plans as it does not accurately depict the infiltration basin that is designed.
4. The Infiltration Basin Detail shall be revised to accurately depict the basin that is designed. The detail shall include the elevation of the basin bottom, cross section of the basin, the depth from the basin bottom to the seasonal high water elevation, the side slopes, outlet structure, etc.
5. All details shall comply with §16.40 of the Stratford Borough Code unless otherwise noted.

**Preliminary and Final Site Plan Review
Atlantic City Electric Company
306 South Atlantic West
Block 69, Lot 10
Review No. 1
Bach Project No. STRATLUB-2022-1
June 17, 2022
Page 10 of 10**

OUTSIDE AGENCY APPROVALS:

This plan set may be subject to the review and approval of the following outside agencies. Evidence of these approvals must be submitted to the Joint Land Use Board and this office prior to the final signature of plans:

1. Camden County Planning Board
2. Camden County Soil Conservation District
3. Fire Marshall
4. Any other as may be necessary

Any and all approvals shall be conditioned upon the applicant addressing the above comments and any and all concerns of the Planning Board contained in the approving resolution.

It shall be noted that any requirements noted above as "waived for completeness only" have been waived to allow the application to be deemed complete. These requirements shall be provided as part of the revised application materials unless waived by the Board at the scheduled meeting.

When plans are resubmitted, they are to be accompanied with a point-by-point response. We reserve the right to make additional comments pending the receipt of revised plans.

If there are any questions or if any additional information is required please contact this office.

Very truly yours,
BACH ASSOCIATES, PC



Steven M. Bach, PE, RA, PP, CME
President

Cc: Anthony Costa, Esq., PB Solicitor
Sharon McCart, JLUB Secretary
Atlantic City Electric Company, Applicant
Niall J. O'Brien, Applicant's Professional
Stephen E. Beavan, PE, Applicant's Engineer

S:\STRATLUB2022\1 Atlantic City Electric Site Plan\Docs\STRATLUB2022-1 A.C. Electric, Site Plan Review No 1.doc