

**LAUREN A. WASILAUSKI**  
Open Space & Stewardship  
Director



Otto Kaufman Community Center  
356 Skillman Road  
Skillman, NJ 08558  
Tel. (609) 466-3023  
Fax (609) 466-6761

E-Mail:  
[lwasilauski@montgomerynj.gov](mailto:lwasilauski@montgomerynj.gov)

## MEMORANDUM

To: Planning Board  
From: Lauren A. Wasilauski, Open Space & Stewardship Director  
Date: February 7, 2024  
Re: PB-08-23: HMH Carrier Clinic, Inc.  
Block 2001 Lot 2 and block 1001 lot 14.02 (252 Route 601)  
Preliminary & Final Site Plan with Bulk Variances and Design Waivers

---

This office has reviewed the following materials and offers the comments below:

- Preliminary and Final Site Plan, prepared by Dewberry Engineers Inc., last revised 11/7/2023 (36 sheets)
- Boundary & Topographic Survey Overall Site, prepared by Stires Associates, P.A., last revised 8/31/2023 (1 sheet)
- Partial Topographic Survey, prepared by Stires Associates, P.A., last revised 8/31/2023 (2 sheets)
- Wetlands Delineation letter and plans, prepared by Dewberry Engineers, Inc., dated 9/13/2023
- Environmental Impact Statement, prepared by Dewberry Engineers, Inc., dated November 2023
- Response letter from Mario Iannelli, Dewberry Engineers, Inc., dated 2/2/2024 (34 pages)
- Renderings of street views – building visibility with proposed landscaping, undated, unsigned (8 sheets)
- Response letter from Array Architects, dated 2/2/2024 (8 pages)
- Preliminary and Final Site Plan sheets EX-01, EX-02, EX-03, EX-04, EX-05, EX-05b, prepared by Dewberry Engineers, Inc., last revised 1/26/2024
- Architectural Plans, prepared by Array Architects, dated 9/18/2023 (3 sheets)

### A. Application overview

1. The Applicant proposes to develop the following:
  - a. Construction of a new building addition (one story, 45,000SF) to accommodate the relocation of the current Child and Adolescent unit, with 52 beds proposed
  - b. Demolition of Executive Office Building
  - c. Expansion of administrative office space that will be relocated from the existing to the new building addition of the Child & Adolescent unit

- d. Removal of trailers at the southeast portion of the site
  - e. 795SF addition to the Family Resource Training Center
  - f. Removal of the tennis court and adjacent parking spaces
  - g. Construction of a 30' x 30' greenhouse in the area of the existing tennis court
  - h. Improvements to the internal roadway system with striping, addition of stop bards and a new connection between two parking fields near the Family Resource and Training Center.
2. The property totals approximately 86.645 acres, located in the Mountain Residential zoning district, in the Planned Behavioral Health Complex optional development alternative area.
  3. There is no proposed change to existing access to the site.
  4. The Applicant is requesting variances for:
    - a. Minimum building setback: 78 feet where 100 feet is required
    - b. Minimum surface parking lot setback to a public street: 49.7 feet where 60 feet is required
    - c. Minimum landscape buffer from a public street: 34.6 feet where 50 feet is required
    - d. Maximum fence height of 14 feet where 10 feet is permitted

**B. Sidewalks and Pedestrian Circulation**

1. Sidewalks are required on all public streets per Code Section 16-5.14C, with the exception of properties located in the MR zoning district:

*“Except for all local, rural collector and scenic collector roads in the MR District, sidewalks shall be provided along all existing streets upon which all residential and nonresidential developments abut, unless specifically waived in certain locations by the reviewing municipal agency based upon good cause shown by the applicant, such as, but not limited to, the existence or proposal of alternate linkages for pedestrian movement and/or where other improvements are proposed to better facilitate the movement of people between the development and adjacent lands;”*
2. If the County proceeds with any road improvements in the vicinity, the Applicant should work with the County to provide pedestrian accommodations to Lubas Field.

**C. Tree Planting and Landscaping**

1. Tree Removal: The Applicant's EIS and sheet C-010 (11/7/2023 plans) indicate that 38 trees will be removed, generally ranging in size from 8" to 24" diameter.

- a. Four of the trees indicated for removal are Callery Pear (*Pyrus calleryana*) which are highly invasive trees that proliferate by seeds and will colonize natural landscapes, crowding out native species. This office encourages the Applicant to remove any Callery Pear trees on the property to prevent their spread onto adjacent agricultural fields and open spaces.
2. Shade Trees: 14 trees per acre are required for residential and non-residential development per Township Code Section 16-5.6d.3. Any trees proposed to meet the buffering and street tree requirements (described below) do not count toward meeting the shade tree requirement.
  - a. Based on the total area of 86.645 acres, the Applicant is required to plant 1,213 trees.
  - b. The Applicant is seeking a waiver from this requirement to calculate based on area of disturbance, rather than gross tract area.
    - i. Sheet C-401 indicates a calculation of 273,107 SF of disturbance, equal to 6.27 acres.
    - ii.  $6.27 \text{ acres} \times 14 \text{ trees/acre} = 87.78 = 88 \text{ trees (rounded)}$  required by ordinance
    - iii. According to the Landscape Schedule on sheet C-501 (11/7/2023 plans), there are 15 shade trees proposed, 39 evergreen trees and 19 ornamental trees.
    - iv. Ordinance requirement not satisfied.
    - v. The Applicant proposes to remove the existing tennis court and add a 30' x 30' greenhouse. The remainder of the area of former tennis court is proposed as lawn. The Applicant may want to consider adding fruit trees to this area to provide another horticultural experience for their clients.
3. Street trees are required along all streets at 50' intervals (Township Code Section 16-5.6.d.15). This office defers to the Board Landscape Architect to determine if the existing landscaping is sufficient to satisfy the street tree requirement.
4. Landscape buffer screening is required by Code Section 16-5.6d.13.
  - a. This office defers to the Board Landscape Architect to determine if the proposed buffer plantings are sufficient.
5. Native plant species are required by Township Code Section 16-5.6.d.5. This office defers species review to the Board Landscape Architect.

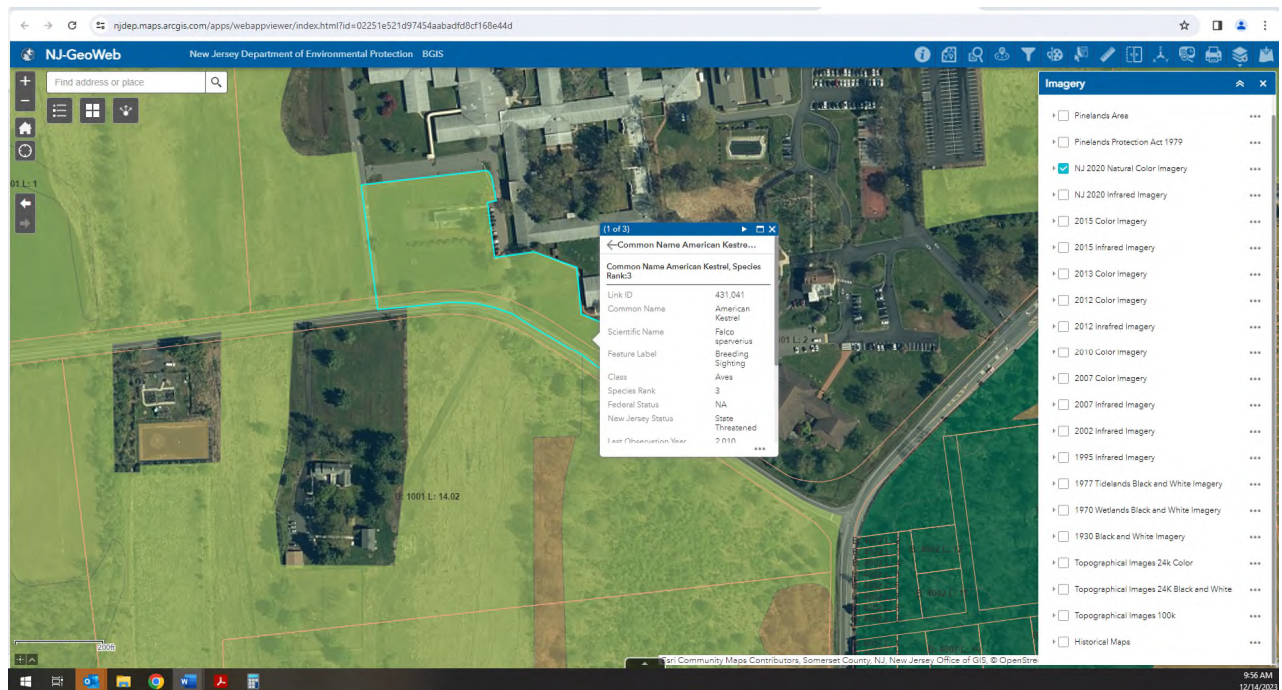
6. All plant materials must include a two (2) year guarantee as required by Township Code Section 16-5.6.d.10:

*“All plant material shall be guaranteed for at least two (2) years from the date of landscape inspection for approval and any plant material that does not survive within that time period or is in poor condition based upon the opinion of the Township Landscape Architect shall be replaced by plant material of the same size and species at the expense of the developer.”*

7. The Applicant should add deer protection to the tree and shrub protection details on sheet C-706. The Open Space Committee and Shade Tree Committee have the best outcomes when using 4’ high weld wire fencing and wooden stakes around each plant.

#### D. Critical Areas / Threatened & Endangered Species Habitat

1. The Applicant’s proposal for a building addition on the west end of the site is in an area indicated by the NJDEP Landscape Project as breeding habitat for the American Kestrel, a State threatened species (screen grab below).



2. Township Code sections 16-5.2(e) & (g) and 16-6.4(e) require a conservation easement or conservation deed restriction on any threatened or endangered species habitat.
3. The Applicant’s EIS states that the “developed portion of the Carrier Clinic is not mapped as suitable habitat.” (Section VI.E Wildlife). The Applicant should reconcile this statement with the map above in their testimony.

4. A conservation deed restriction may be impractical on this area given the existing and proposed development, but this office can't make a final determination without further details.
5. The Applicant should consider installing kestrel nesting boxes nearby.
  - a. The American Kestrel Partnership has tips on their website such as installing a box with the opening facing southeast, and not installing boxes near busy roadways: <https://kestrel.peregrinefund.org/nest-monitoring>

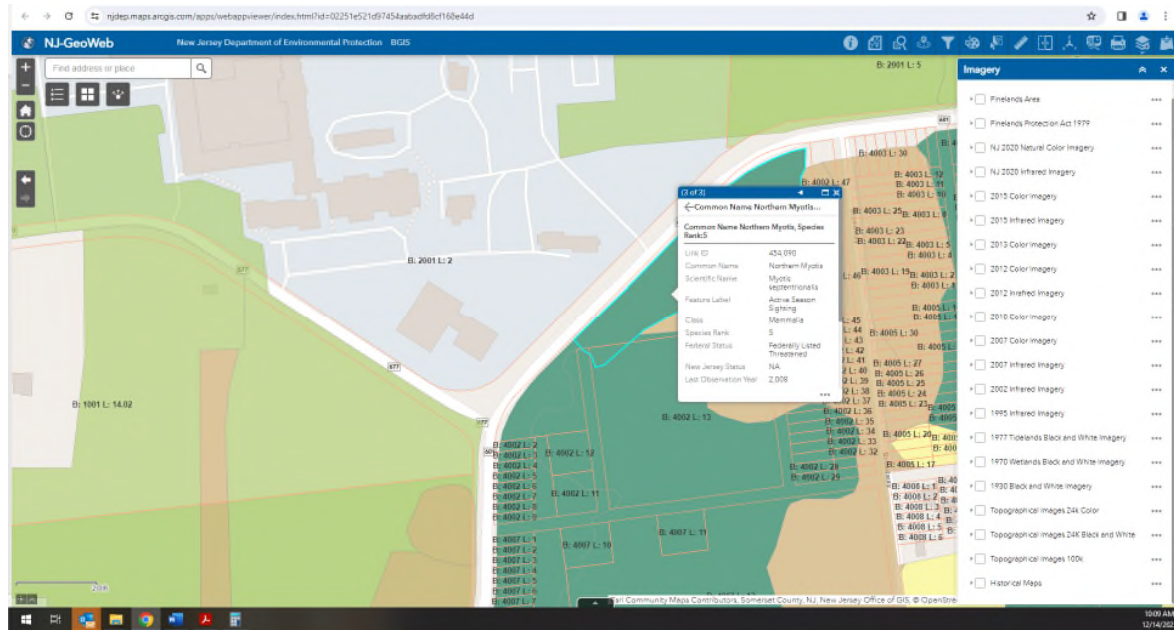
E. Lighting

1. Sheets C-601 indicate the Applicant proposes Pacific Lighting Standards Co. Type 4 Optics and Type 3 Optics light fixtures.
2. Sheet C-705 indicates a color temperature of 4000K. If available in this model, the Applicant should the option that utilizes a color temperature no greater than 3000 kelvins, preferable 2700K or less. If this model does not offer a color temperature of 3000K or less, another model should be selected.
  - a. This office appreciates that the lighting is directed downward to minimize light spillover.
  - b. Shields should also be added to minimize glare and direct the light to where it's most needed.
3. At the Site Plan Subdivision Committee meeting of January 19, 2024, the Applicant stated that the building mounted sign of the adolescent unit addition would include some lighting, but none is specified on the architectural plans, specifically sheet A202.1.



4. The impacts of too much light at night (particularly “blue” or short wavelength lighting) have been documented to negatively impact human health, as well as wildlife and insects.
  - a. Princeton University’s Office of Sustainability recently released a short documentary detailing these negative impacts:  
<https://www.youtube.com/watch?v=FW0WZX75Nmo>
5. This is particularly important because there is habitat for the federally threatened Northern myotis bat immediately adjacent to the property to the southeast (see screen grab on following page).





## F. Electric Vehicles

1. The Applicant's EIS states that electric vehicle charging stations are proposed (Section VIII.D Energy Conservation Measures), but this office could not locate them on the plans provided. The Applicant should provide further details on the proposed electric vehicle charging stations and whether it meets the requirements of Code Section 16-5.21 d.