



MONTGOMERY

TOWNSHIP, NEW JERSEY

ENVIRONMENTAL COMMISSION

To: Montgomery Township Planning Board
From: Montgomery Township Environmental Commission
Re: PB-08-23 HMH Carrier Clinic
Date: February 7, 2024

A. Energy Efficiency

1. The Environmental Commission recommends that the applicant use LEED standards in the design of this application.
2. The Applicant should follow the current state regulations on EV charging stations, for visitors and employees.
3. The applicant should use water and energy saving fixtures and appliances. We recommend solar panels on the roofs, and a geothermal heat exchange HVAC system. These suggestions could save the applicant a lot of money on utility bills in the future. We strongly recommend that the roofs should at least be solar-ready.

B. Stormwater

1. We are not clear whether the application has been designed under the new state and municipal stormwater regulations.
 - a. We appreciate the use of pervious pavement, though we cannot see on the site plan where it will be located.
 - b. We also wonder whether the applicant considered two stories for the new wing, to reduce the amount of lot coverage.
 - c. And how about a green roof?
 - d. Why not rain gardens, and rain barrels?
 - i. Also, water from rain barrels could be used to wash the pervious pavement to keep it pervious.
 - e. As development continues and the weather gets worse, it will be impossible during a heavy rainstorm for your clients to be transported to a hospital. That has already been impossible during some heavy rainstorms. Furthermore, there is worsening flooding downstream from Montgomery. We would all benefit from everyone doing a little extra to sequester water onsite.

C. Landscaping

1. The applicant has identified 98 trees in the area of the project, and we are sorry to see that they propose to cut down 38 trees, ranging in diameter from 2-1/2" to 24".
2. We do not regret the loss of the invasive callery Bradford pears, but most of the other trees are valuable to wildlife. Trees and other greenery promote human health and happiness, which we believe must be very beneficial to a facility such as this.
 - a. There has been a study showing that birdsong increases happiness in people who can hear it, and the greater the variety of birdsongs, the greater the happiness. Another study has shown that birds build nests where there are at least 70% native trees, because birds feed caterpillars to their babies, and caterpillars feed on native vegetation. Birds must carry many thousands of caterpillars to their nests to raise every clutch of eggs, and the shorter the trip, the more caterpillars they can bring their hungry babies.
3. We suggest that this application provide all-native landscaping, from flowers to trees.
 - a. Native oak and pine trees are the only ones that provide caterpillars early enough for the first clutch of eggs in spring. Oak trees host over 500 different species of moth and butterfly caterpillars, native black cherry trees over 400 species, native birch trees over 350, and native pines over 200.
 - b. We recommend white oak, willow oak, and swamp white oak trees, river birch, black willow, redbud, quaking aspen, red maple, hackberry, and tupelo trees. These trees all support native birds and pollinators, and have features that people enjoy, such as fall color, attractive bark, flowers, or the fluttering leaves of the aspen.
 - c. American basswood, whose flowers perfume the air, should replace Eurasian linden; white pine could provide evergreen screening where it is needed, if American holly fills in the gaps as the pine trees limb up. Native pine trees also emit more chemicals into the air than any other type of tree that, when breathed, improve our immune systems.
 - d. Hornbeam is an attractive small tree with nice fall color, and bayberry and inkberry holly are native shrubs that provide berries for migrating birds in autumn. Birds also eat the fruits of Bradford (aka callery) pears, but those berries lack the nutrients that native birds need, and barely repay them for the energy they expend foraging.

- e. Blackhaw viburnum is a large, attractive, deer-resistant, native shrub, with spring flowers, fall color, and berries for birds, and host to over 100 moths and butterflies.
 - f. We would also like to see some shagbark hickories planted to provide roosting sites under their shaggy bark for the endangered long-eared bats that are found on the site.
 - g. Golden ragwort should replace Liriope as an evergreen groundcover, scarlet beebalm can attract hummingbirds, and obedient plant grows so densely in sun that it crowds out weeds. Dozens of Liriope were planted in front of Montgomery's new Municipal building, and barely half remain alive; meanwhile the native golden ragwort planted nearby is spreading vigorously.
 - h. If ornamental grasses are needed, purple love grass grows well in full sun, and northern sea oats in shade. There are so many beautiful choices of native trees, shrubs, flowers, and groundcovers!
 - i. Meanwhile, we must wait for any non-native plants to become invasive, as so many seemingly innocuous non-native plants have in the past. Only twenty years ago, Bradford pear was not invasive; in fact, it didn't even produce any fruit. Some of your proposed plantings are emerging invasive species.
 - j. Please replace Kousa dogwood with eastern redbud or a native serviceberry, and Spirea japonica with one of our many beautiful native shrubs, such as fragrant sumac or ninebark.
 - k. Over a million species are at risk of extinction worldwide, and the Environmental Commission believes that we should do what we can to protect the plants and animals native to Montgomery. We understand that some of the variances you are requesting are due to the unusual nature of your facility, but we don't see any reason that you cannot plant more trees and plant all-native landscaping.
4. Since the residents are only allowed outdoors in the courtyards of the buildings, we recommend that they be landscaped with native plants for their enjoyment.

D. Lighting

1. The Environmental Commission recommends that the site lighting should be pointed downwards, shielded from the sides, and as low in elevation and intensity as possible, in keeping with Montgomery's Dark Skies policy.

2. Please be aware that overly bright lights can cause glare and temporarily blind people, reducing visibility; and any lighting may interfere with nocturnal pollinators, fireflies, bats, and migrating birds.
3. Yellow light bulbs, which are the least disorienting to wildlife, should be used.
4. The lights should be turned off as early as possible in the evening, they could be set on a motion detector, and the applicant might consider special protocols, such as early closing, or brief shut-offs during spring and fall migration. We all benefit from pollinators, and we all enjoy birds and butterflies, so every effort should be made to prevent their extinction.

E. General Comments

1. We have no objection to the tall fences, as you need them for a different reason than the rest of Montgomery.
2. We find your 34-page memo very difficult and frustrating to use, as the replies from the applicant refer to documents without page numbers, and there is no table of contents or even a title at the top of each page to indicate which memo the applicant is replying to or who is replying, and the replies to one memo frequently refer to replies by other experts for the applicant, replying to other memos.