



July 7, 2015

Haddon Township Combined Planning Board
ATTENTION: Mr. Richard Rotz, Chairman
135 Haddon Ave.
Haddon Township, NJ 08108

Re: True North Site Plan Application

Dear Members of the Combined Planning Board,

The Delaware Riverkeeper Network (DRN) opposes the applicant's request for a variance or variances to exceed the Township's maximum improvement coverage of 60% because it will create an unreasonably adverse impact upon the area in which it is proposed to be established. Further, the application fails to meet the requirements of many other Haddon Township ordinances as discussed below.

According to Haddon Township Land Use Ordinance - Land Use and Development Article IV. Subdivision, Site Plan and Conditional Use Approval, Section 142-28, Planned developments/general development plans:

“Prior to approval of such planned developments, the Planning Board shall find the following facts and conclusions:

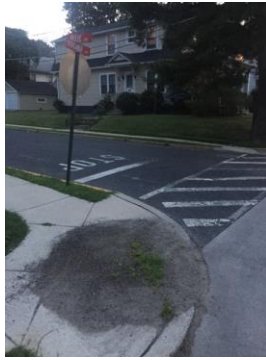
(4) That the proposed planned development will not have an *unreasonably adverse impact upon the area* in which it is proposed to be established.” (our emphasis added)

Additionally, Section 142-54 C states:

“...No stormwater runoff or natural flooding shall be so diverted as to overload existing drainage systems or create flooding or the need for additional drainage structures on other private properties or public lands without proper and approved provisions being made for taking care of these conditions....”

There is already an issue of localized flooding at the intersection of Reeves and Virginia Aves. Please see photo below:

DELAWARE RIVERKEEPER NETWORK
925 Canal Street, Suite 3701
Bristol, PA 19007
Office: (215) 369-1188
fax: (215) 369-1181
dm@delawareriverkeeper.org
www.delawareriverkeeper.org



Localized flooding is evidenced by accumulated sediment deposits from stormwater runoff and standing water at Reeves and Virginia Avenues

The added runoff from the proposed True North project will increase the impervious cover at that site to from 54.6% to 83%, resulting in even greater runoff and flooding.

The impacts of stormwater runoff do not end at that intersection. As Planning Board Engineer Mr. Greg Fusco notes in his June 29, 2015 letter (pg. 3, #9) stormwater from this site and surrounding community flows down Reeves Ave, to Virginia and then to Center Street. However, upon further investigation, stormwater runoff continues down Center and flows into Edison Woods. According to Google maps, Edison Woods is approximately 1100 feet from the True North project site.

Edison Woods is a critically important, albeit abused, parcel of Haddon Township open space. It is listed on the Township's Recreational Open Space Inventory (ROSI) and zoned a Conservation Area. Only a few years ago there was a small amphitheater with tiered seating providing an inviting outdoor classroom for the adjacent Edison Elementary School, Boy Scout programs and the general public to enjoy. There is still great potential for this unique Township-owned parcel to be revitalized from its current neglected condition to its former glory. But that can only happen if less NOT MORE stormwater runoff and non-point source pollution is allowed to flow into it. The True North project will exacerbate the degraded conditions of Edison Woods.

Please review the photographs (below) taken from Edison Woods. The Delaware Riverkeeper Network contends that the increased runoff from the proposed True North project will directly and indirectly impose adverse impacts onto the residents of Haddon Township and the environment by:

- Degradation of the ecological health of Edison Woods and the Edison Branch of the Cooper River,
- Loss of usable open space due to accelerate erosion from an increase in the high velocity and volume of stormwater runoff,
- Increasing the maintenance and capital improvement cost of infrastructure (from both HT staff and consultants) in Edison Woods, streets and elsewhere,
- Reducing real estate values on surrounding properties because they are adjacent to area that, even to an untrained eye, appears un-inviting and an eyesore – compared to increasing real estate values if Edison Woods were maintained in a high quality ecological condition, such as Saddlers Woods,
- Degradation of recreational opportunities, such as outdoor classrooms, wildlife observations, hiking trails in Edison Woods and linking trail system to Cooper River Park, etc., for Township residents,
- Increasing the hazard to anyone using woods walking near the collapsing banks, and
- Creating a greater public safety and health problem.



**IN EDISON WOODS LOOKING TOWARD CENTER STREET – CONCRETE STORMWATER INLET CHANNELS
RUNOFF INTO EDISON WOODS**



CENTER STREET RUNOFF CAUSING DOWN-CUTTING AND EROSION



EDISON WOODS OUTFALL PIPE #1 – CONCRETE AND GABION REINFORCEMENT AND ARMORING NECESSARY DUE TO HIGH VOLUMES AND VELOCITY OF STORMWATER. HARD ENGINEERING SUCH AS THIS ONLY MOVES WATERS’ DAMAGING ENERGY FURTHER DOWNSTREAM TO UNPROTECTED SECTIONS



EDISON WOODS OUTFALL PIPE #2 – STREAMBANK REINFORCED AND ARMORED WITH ROCK-FILLED GABION BASKETS DEplete ECOLOGICAL VALUE OF AREA



EDISON WOODS OUTFALL #3 – RECEIVES RUNOFF FROM VESPER AVE. OUTFALL REINFORCED AND ARMORED WITH ROCK-FILLED GABION BASKETS. NOTICE LARGE TREE TOPPLED OVER LIKELY THE RESULT OF “DOWN-CUTTING” OF CREEK AND STREAMBANK EROSION



OUTFALL PIPE #3 DAMAGED. NOTE DOWNSTREAM EROSION. ENERGY FROM THREE OUTFALL PIPES ONLY PUSHES ACCELERATED EROSION AND WATER QUALITY DEGRADATION FURTHER DOWN THE CREEK AND THEN INTO THE COOPER RIVER.



MORE ACCELERATED EROSION IN EDISON WOODS. EROSION AND SEDIMENT DEGRADES WATER QUALITY, SMOOTHERS AQUATIC HABITAT, LEADS TO A LOSS OF USABLE OPEN SPACE, DEGRADES RECREATIONAL OPPORTUNITIES AND MOVES THE SEDIMENT DOWNSTREAM INTO THE COOPER RIVER WHERE HADDON TOWNSHIP AND OTHER CAMDEN COUNTY TAX PAYERS ARE GETTING READY TO SPEND \$9 MILLION DOLLARS FOR DREDGING.

Again, it is DRN's contention that the True North project will result in an unreasonably adverse impact upon the area in which it is proposed to be established, specifically Haddon Township's roadways, infrastructure and Edison Woods, and should therefore be denied by the Planning Board.

Additionally under Haddon Township ordinance 142-28, Section C, it states "A general development plan may include, but not be limited to, the following:"

(5) A stormwater management plan, setting forth the proposed method of controlling and managing stormwater on the site.

(6) An environmental inventory, including a general description of the vegetation, soils, topography, geology, surface hydrology, climate and cultural resources of the site; existing man-made structures or features; and the probable impact of the development on the environmental attributes of the site."

DRN respectfully requests the Planning Board to advise where this applicant has set forth their "method of controlling and managing stormwater on the site." (per #5 above) and where they have presented an "inventory" of "the probable impact of the development on the environmental attributes of the site."(per #6 above). It is DRN's contention that they have not done either. And if they did, they would have to assess the degraded conditions in Edison Woods as we have. Again, because these degraded conditions will likely only worsen with the increased stormwater runoff from the increased impervious surfaces AND that those degraded conditions will directly impact the residents of Haddon Township, we urge the Planning Board to deny this variance application.

Under Haddon Township ordinance 142-32, Site plan design standards, “In reviewing any site plan, the reviewing board shall review the individual requirements of the zone, and the following:

A.(8) “Environmental protection. Critical attention should be given to preserving the landscape in its natural state insofar as possible and to improving the existing site conditions according to high standards of conservation and environmental protection, in keeping with the surrounding natural setting. The development plan should demonstrate the avoidance of unnecessary alteration of existing topography or the removal of vegetation. ***The proposed development shall otherwise respect the established natural conditions of the site and its surroundings.*** For all development, provisions shall be made for the on-site retention and/or ground infiltration of any additional surface runoff which would be created by the proposed development.” (Emphasis added)

The increased runoff from the increased impervious cover going from 54.6% to 83% will likely exacerbate flooding in Edison Woods and surrounding streets (nuisance flooding is already a problem at the intersection of Reeves Ave and Virginia Ave). As such, this project does not respect the natural conditions of this site and its surroundings and we urge the Planning Board to deny this variance application.

Mitigation of Stormwater Runoff

No mitigation of the increase in runoff is proposed in the application, in violation of Section 142-54 B:

Total stormwater runoff from a site after development shall be limited to not more than the runoff from the site in its predeveloped state. Detention and retention facilities shall be utilized to limit such runoff. The Board may waive this requirement if the nature of the site, the character of adjacent previously developed areas or other factors make the utilization of runoff limiting devices unnecessary, inadvisable or impractical.

Many means of mitigation of runoff are available to the applicant, including underground cisterns/infiltration chambers, above ground cisterns, pervious pavements with underground storage/recharge, and gray-water re-use of captured stormwater, for instance for irrigation.

Because of the previously-described downstream impacts, we respectfully recommend that any increase in impervious coverage above the 60% code requirement be fully mitigated – to provide infiltration or other *volume-reduction* method(s) for the 100 year storm, in addition to *rate* mitigation for the 100 year storm.

Buffers

Another negative result of the increased impervious surface proposed is that not enough room is left for the required buffering. The parking lot is set two feet from the residence on the southwest (left) property line. Similarly, a very narrow strip is left at the rear property line (at the parking back-out area). A five foot buffer is required by ordinance.

Parking lots are required to be screened from residential properties according to 142-39:

“All parking and loading areas shall be landscaped and screened sufficiently to obscure the view of the parked vehicles and loading platforms from any public street, adjacent residential districts or uses, and the front yards of adjacent commercial and industrial uses. Such screening shall be by a fence, wall, evergreen planting or combination of the three and shall not be less than four feet in height.”

The proposed four foot fence on the side and rear line does not meet the requirement to “obscure the view of the parked vehicles -- it is only meeting the minimum height, but it does not provide actual obscuring. Anyone standing on the residential lot, or in the house, will easily see the parking lot and parked cars. It seems the only way to actually screen this parking lot from the close-by residence is with thickly planted tall vegetation (can be combined with a fence per code), needing a reasonable planting bed width (two feet is not likely sufficient for healthy vegetative screening).

Additionally, there is no screening of parked cars when viewed from the street, as required by code.

Because the buffer and screening are deficient, we respectfully recommend that any related waiver/exception/variance be denied.

Parking Egress

Another problem with the attempt to maximize parking onsite (and thus increase impervious surface) is that there are two parallel parking spaces in the proposed plan that have a poor means of exit. Anyone parking in the two parallel spots would typically be facing towards the back of the property, and when the lot is full, they would have to back onto Reeves Ave to exit the lot, or utilize the handicap pedestrian aisle for turning around.

142-39 (6) (b) “The provision of parking spaces shall also include adequate driveway and necessary turning areas for handling the vehicles for which provision is made...”

Because this parking situation is undesirable, this gives reason for the Board to deny any exception/waiver being requested by the applicant for increasing impervious coverage, because these spaces do not improve the site. Code section 142-52 states:

“A site plan or subdivision which includes a proposal to deviate from any of the regulations shall require an exception or waiver. An exception or waiver may be granted when, in the opinion of the Board, such exception will result in an improvement in the design...”

We respectfully recommend that any parking plan be revised to fix this problem.

Detriment to Zone

Putting a parking lot over so much of the property provides substantial impairment to the residential properties at the side and rear lot lines, because of visual issues and noise from cars in the proposed parking lot so close to the property line. Also, increased runoff would exacerbate flooding and downstream erosion, as described above.

Additionally, the violation of the coverage requirements is not in character with the zone plan. Vegetated areas (the 40% minimum required by code) provide vegetative cooling, stormwater mitigation, air quality benefits, and beauty to a zone. The 60% maximum impervious requirement is a valid requirement for the health, safety and welfare of the residents.

Coverage and setback waivers, if granted, would be an awful example and precedent for this residential zone. If granted, there would be nothing precluding this church or other conditional uses from purchasing and demolishing more houses for parking and expecting similar relief from the code, further exacerbating the problems described in this memo.

Respectfully, it does not seem that the project benefits justify the requested waivers/exceptions to enable the Board to grant relief. Article 142-52 states:

“...no such exception shall be granted unless the Board finds that the exception or waiver can be granted without substantial detriment to the public good or substantial impairment of the intent and purpose of the zone plan and zoning ordinance.”

Based upon the numerous citations from Haddon Township ordinances and for the reasons stated above, the Delaware Riverkeeper Network urges the Combined Planning Board to deny this variance application.

Sincerely,



John Nystedt, RLA, LEED AP BD+C
Restoration Specialist
Delaware Riverkeeper Network



Fred Stine
Citizen Action Coordinator
Delaware Riverkeeper Network

Cc (Electronic only):

Mayor and Commissioners

Mr. Joseph Iacovino

Mrs. Suzanne Discher

Ms. Linda Rohrer

Ms. Marguerite Downham

Mr. Frank Monzo

Mr. Nicholas Mink

Mr. Charles Pusatere

Mr. William Wambach

Mr. Wayne Chang

Mr. James Stevenson

Mr. Greg Fusco, Haddon Township Engineer

Mr. Donald Cofsky, Esq., Planning Board Solicitor

Mr. Stuart Platt, Esq., Haddon Township Solicitor

Mr. Lee Palo, Zoning Officer

Police Chief Mark Cavallo

Fire Marshall William Behnke

Mr. Edward Toussaint, Construction Code Official

Ms. Bonnie Richards, Planning Board Secretary

HTEC

HT Shade Tree Commission

Ms. Dawn Pennock, R.M.C., Township Clerk

Ms. Kevin Becica, P.E. Camden County Engineer

Camden County Planning Board

True North Church