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Site Suitability Analysis – Planning Rebuttal Report

Site in the Township of Middletown:

Block 1045, Lot 12 (490 Red Hill Road)

Referred to as "Red Hill Road Site"

Prepared:

September 30, 2024

Prepared by:



T&M Associates

11 Tindall Road, Middletown Township, NJ 07748

*The original of this document has been signed
and sealed in accordance with New Jersey Law.*

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Executive Summary

This report offers a planning analysis of a proposed 70-unit inclusionary multifamily development on a property known as 490 Red Hill Road, or Block 1045, Lot 12, in the Township of Middletown.

The developer proposes a 70-unit inclusionary development with both affordable units and market-rate units although detailed plans have not been provided.

This report finds several instances where the proposed development does not represent sound planning, including:

- Site layout as a portion of the building would be constructed below grade. This layout results in the inability for a portion of the building to have windows or doors, in conflict with Fire Code requirements.
- Property location as the site is located in a remote area that does not have access to public transportation. Residents would rely on automobile ownership, including the affordable households.
- Lack of employment opportunities or services within walking distance.
- Site Circulation that does not provide safe circulation for the municipality's fire trucks.
- Significant parking deficits pursuant to RSIS requirements.

In addition, this report finds that the development proposal is not approvable due to:

- Site design resulting in portions of the building being constructed below grade which does not conform to Code;
- Insufficient parking per RSIS standards;
- Steep slope disturbance;
- Site circulation that does not provide safe circulation for the municipality's fire trucks.
- The development proposal does not conform to Monmouth County Site Access standards.

This report finds that the development proposal is not developable due to:

- Lack of sewer service, which is subject to outside review and approval.

This report finds that the development proposal is not suitable due to:

- Location in a remote area that does not offer public transportation opportunities;
- Location that is not compatible with surrounding uses;
- Lack of access to employment, shopping and services;
- Findings of the Princeton Hydro ERI.

We note that total unit yield would likely be impacted based on revisions to the development proposal due to the several of the above findings.



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Materials Reviewed

The following materials were reviewed in connection with the preparation of this report:

- Concept Plan prepared by CPL Partnership, LLC, dated February 21, 2023, consisting of one sheet.
- Site Suitability Report, prepared by Cofone Consulting Group, LLC, dated July 18, 2024.
- Letter prepared by Donna M. Jennings, Esq. of Wilentz Attorneys At Law, dated July 19, 2024, entitled "Proposed Builder's Remedy Requests/Development Proposals."
- Traffic Impact Assessment for 490 Red Hill Road, prepared by Dolan & Dean, dated July 15, 2024.
- Environmental Resources Inventory, Prepared by Princeton Hydro, LLC, dated September 2024.
- Township of Middletown Ordinance No. 2023-3371, approved June 5, 2023.
- Affidavit of Anthony Mercantante, dated November 23, 2023.
- Site Suitability Engineering Rebuttal Report, prepared by Charles Cunliffe, PE, PP, CME, dated September 30, 2024.

Subject Property

The subject property is known as Block 1045, Lot 12 and is an irregularly shaped lot that consists of approximately 2.18 acres per Township tax maps. Lot 12 is located on the eastern side of Red Hill Road, north of the Crawfords Corner/Everett Road intersection. Red Hill Road forms the municipal border between Middletown and Holmdel.



The subject property is primarily vacant but contains fencing along Red Hill Road and a gravel parking area.

The property is located within the R-45, "Low Density, Single-Family Residence" zone district. Permitted principal uses within the R-45 zone include single family dwellings and mother/daughter dwellings on a minimum lot size of 45,000 square feet, as well as farmland and various recreational uses.

There are a variety of land uses in the vicinity, including residential, farmland, office and a House of Worship. Lot 12 is outlined in the above image that was captured on Near Map on March 11, 2024. The



aerial shows the subject property and surrounding area as primarily larger, open parcels with larger lot residential development.

Proposal

The developer proposes the construction of a new inclusionary development consisting of 70 residential units and associated parking. Of the 70 units, 11 would be affordable, which is a 15% set-aside. The proposed building will cover almost the entire length of Lot 12, with the front side of the building measuring approximately 350 ft., and the back side of the building measuring approximately 300 ft.

The concept plan includes 71 parking spaces in a surface parking area behind the building, none of which are indicated as ADA compliant or Electric Vehicle (EV) parking spaces. No outdoor amenity space or dedicated open space is shown on the Concept Plan.

A specific building height is not provided. However, the Concept Plan includes a "Section" that indicates the proposed building will contain five stories as well as a gabled roof. Based on the proposed five stories, the building height might be 55 ft. or greater. Per the Section detail, it appears that the left side of the building is being constructed into the slope of the property, with that side of the first three stories proposed below grade.

The developer has provided a planning report prepared by Cofone Consulting Group, LLC, dated July 18, 2024 (referred to as the "Cofone report"). The Cofone report states that there is an appropriate amount of open space on the site, which is incorrect. We disagree with this statement from a planning perspective. As noted, the Concept Plan does not provide any amenity space for residents, including any outdoor play area for children, walking paths or seating areas. Such a design does not represent good planning, in particular in an affordable housing development.

Finally, the proposed development would have a density of approximately 32 units per acre based on the tax map lot acreage of 2.18 acres, which is not an appropriate density for a location characterized by single family dwellings, vacant land and farmland.

Site Suitability Analysis

The Cofone report includes a determination that Lot 12 meets the New Jersey Council on Affordable Housing (COAH) rules on being available, approvable, developable and suitable to be used as affordable housing.

This report disagrees with the conclusions in the Cofone report's that Lot 12 is suitable for the proposed development and offers the following analysis. Some of the analysis relies upon conclusions contained in a report prepared by Charles Cunliffe, PE, PP, CME of T&M Associates dated September 30, 2024 (referred to as the "Cunliffe report").

The affordable housing rules require municipalities to designate sites that are approvable, available, developable and suitable, as defined in N.J.A.C. 5:93-1. These terms are defined as follows:



Approvable Site – A site that can be developed for low- and moderate-income housing in a manner consistent with the rules or regulations of all agencies with jurisdiction over the site. The site may be approvable although not currently zoned for low- and moderate-income housing.

Available site - A site with clear title, free of encumbrances which preclude development for low- and moderate-income housing.

Developable site - A site that has access to appropriate water and sewer infrastructure, and is consistent with the applicable areawide water quality management plan (including the wastewater management plan) or is included in an amendment to the areawide water quality management plan submitted to and under review by NJDEP.

Suitable site - A site that is adjacent to compatible land uses, has access to appropriate streets and conforms to the environmental policies delineated in N.J.A.C. 5:93-4.

We disagree with the conclusion that the site meets the applicable criteria as described below.

A. Approvable Site

The Cofone report states the following regarding Lot 12 being an approvable site, *“Approvable: The development of the subject property is supported by local, regional and state planning policies. The proposed plan would fit the site and meet the applicable regulatory criteria for development approvals.”* **This report disagrees with the above conclusion as follows.**

Site Layout

We note that the developer did not provide architectural drawings to supplement the Concept Plan. From the submitted Concept Plan, it appears that the front façade of the multifamily residential building is proposed to be constructed into the slope of the property, with the first three stories below grade. As indicated in the Cunliffe report, based on the Concept Plan, *“Per the International Fire Code (IFC) 2021, the proposed building is classified as Use Group Residential Group R-2 as it is an Apartment Building which will contain sleeping units and more than two dwelling units where the occupants are permanent in nature.”*

The Cunliffe report continues, *“In accordance with Section 1031.2 of the IFC, Basements and sleeping rooms below the fourth story above grade plane shall not have fewer than one emergency escape and rescue opening, which is defined as ‘an operable exterior window, door or other similar device that provides for a means of escape and access for rescue in the event of an emergency.’”* The Cunliffe report further states, *“... this configuration impedes the construction of habitable bedrooms on that side, significantly limiting the number of dwelling units and habitable space available within the building.”*

The Cunliffe report concludes the following, *“The Development Concept does not include any architectural floor plans. Since the first three (3) stories of the structure’s front (western) façade are built into the existing site slopes, below adjacent grade relative to Red Hill Road, operable exterior windows or doors cannot be placed along this side to comply with IFC 2021. Consequently, it would be virtually impossible to construct habitable bedrooms or sleeping rooms on the entire western side of the building for these three*



stories. This limitation significantly reduces the number of dwelling units and habitable bedrooms that can be accommodated within the building.”

Based on the above conclusion, the multifamily development is not approvable. It is not sound planning to recommend a multifamily development proposal that would result in the inability to include operable exterior windows or doors in compliance with the International Fire Code. The configuration also limits the number of bedrooms and habitable space, and dwelling units in the building. As concluded in the Cunliffe report, “Overall, we question the yield of dwelling units and bedrooms that can be accommodated within the Building Layout.”

We also note that the provided design, with portions of the building below adjacent grade, does not provide adequate light, air and open space.

Parking

The proposed multifamily residential development consists of 70 units and includes 71 onsite parking spaces. Of the proposed parking spaces, none are ADA compliant and no Electric Vehicle (EV) spaces are provided as required by N.J.S.A. 40:55D-66.20.

The bedroom distribution of the proposed development was not provided. Bedroom distribution is required for conformance with the Residential Site Improvement Standards (RSIS) contained in NJAC 5:21-4.14. Per the Cunliffe report, if all of the dwelling units consisted of one-, two- or three-bedroom units, the parking requirement for a midrise development concept would be 126, 140 or 147 parking spaces, respectively. The Cunliffe report points out that, even if all of the 70 units consisted of one-bedroom apartments, the development would have a 55-unit parking deficit (126 required parking spaces vs. 71 spaces proposed).

However, it is not possible for the development to consist of all one-bedroom units due to the Uniform Housing Affordability Controls (UHAC) requirements contained in N.J.A.C. 5:80-26.1. UHAC regulations stipulate that, for the 11 affordable units, no more than two (2) units can be one-bedroom units, and that a minimum of four (4) of the units must be two-bedroom units and three (3) of the 11 affordable units must be three-bedroom units. Therefore, even the minimum parking deficit of 55 spaces cited in the Cunliffe report is too lenient.

We also note that the subject property is in a remote location without access to public transportation. Often, planners can accept and recommend a parking reduction when transit opportunities are available because those residents without automobiles can utilize the mass transit system. In fact, it is common planning practice to encourage the location of multifamily housing and affordable units in those locations that are walkable and have public transportation. The subject property is not such a location and is not pedestrian friendly or located proximate to transit opportunities.

Therefore, the parking deficit cannot be offset by the availability of other transportation options, and, as such, the proposed development on this property does not represent sound planning and is not approvable.



Steep Slopes

The Cunliffe report provides a detailed analysis on the development's disturbance of steep slopes. The report states, *"Based on this office's review of topographic data, more than 75% of the property is situated on slopes greater than 10%. We estimate the proposed Development Concept will disturb over 56% of the steep slopes greater than 10%, 39% of slopes between 10-15%, 52% of Class II Critical Areas (15-25% slope) and 68% of Class I Critical Areas (>25%) onsite. Many other recent Planning Board approval have been able to demonstrate a reasonable use of the property, while minimizing disturbances to these areas. It does not appear that the Development Concept has made any such effort to minimize disturbance to these areas, and the likelihood that the Developer could minimize without reducing the scale of the development is unlikely. To both reduce the overall footprint of steep slopes disturbance and maintain the same proposed dwelling unit count, this would require the building height to be increased in terms of both feet and stories, which will exacerbate the visual impact and availability of air light and open space to neighboring properties."*

The Cunliffe report continues, *"These disturbance estimates are likely to increase as the site progresses to a fully engineered site and grading design. Disturbance of steep slopes and vegetation removal typically accelerate erosion from stormwater runoff, leading to sedimentation in downstream water bodies, degradation of water quality, and loss of aquatic life support. The Nut Swamp Brook, located immediately downstream, is likely to be affected by the proposed disturbance of steep slopes."*

The above information shows the potential degradation of sloped area onsite, including Class I and Class II Critical Areas, in connection with the proposed development, which does not represent sound land use planning and results in the property not being approvable.

Site Circulation

The Cunliffe report raises safety concerns relative to the proposed site circulation. The report includes Circulation Exhibits for design vehicles. These exhibits show that the vehicles are not able to freely circulate the site without leaving the limits of the proposed drive aisle.

The Cunliffe report summarizes that, *"The Development Concept does not allow for safe circulation of the Middletown Township Design Fire Truck, especially at transitions between the main driveway and lower parking area, posing safety concerns. The site's existing steep slopes, ranging from 15-25% in the vicinity of the proposed driveway, exceed the allowable 10% for driveways per Township regulations and the International Fire Code, which will likely necessitate significant earthwork, disturbance and/or the removal of trees to comply and could reduce scale of the development. Any proposed fill could raise the building's height relative to Red Hill Road, ultimately impacting the visual aesthetics of the surrounding area."*

A development plan that does not provide safe circulation for the municipality's fire trucks does not provide sound planning and is not approvable.

Monmouth County Standards for Site Access

As described in the Cunliffe report, the development proposal does not conform to Monmouth County Site Access standards.



The lot is located on the eastern side of Red Hill Road, which is CR 502. The Monmouth County Planning Board has jurisdiction over site access. Per the Cunliffe report, the following items do not conform to the County requirements:

- Required Site Distance
- Appropriate driveway location.
- Appropriate profiles for a new driveway.
- Left turn storage lanes for a new driveway.
- By-pass areas for a new driveway.
- Roadway Widening

The Cunliffe report provides the following summary of the impacts of the above items:

"The Development Concept is subject to the Monmouth County Planning Board's regulations, which emphasize the need for safe access and proper sight distances for new driveways. The site's driveway configuration does not meet sight distance requirements due to existing and/or proposed vegetation obstructing sight lines along the site frontage. Compliance with setback regulations would require significant modifications to the plan, including slope grading and/or retaining walls. Additionally, the proposal fails to align with existing driveways and does not provide a left-turn storage lane into the site, nor by-pass areas. To adequately address these issues, substantial revisions to the Development Concept are required to ensure compliance, which would likely reduce the scale and yield of the Development Concept. Right-of-way acquisitions may also be needed, which the Developer may not be able to obtain."

As stated in the Cunliffe report, revisions to the Concept Plan are needed to address the County requirements. Such revisions would likely result in a reduction to the total number of proposed residential units. Failure to address the County's requirements results in the development concept being unrealistic and not approvable.

B. Available Site

An available site is one with clear title, free of encumbrances which preclude development for low- and moderate-income housing.

We have no information regarding any encumbrances to Lot 12 that would preclude development.

C. Developable site

The Cofone report states the following regarding Lot 12 being a developable site, "Developable: An LOI issued by the NJDEP indicates that 'freshwater wetlands and waters are not present' and no part of the (site) occurs within a transition area or buffer. Evidence provided from NJDEP Geoweb shows the site within the water franchise area. Though the site was previously excluded from the sewer service area based on the erroneous conclusion that the site is encumbered by wetlands, the LOI confirms this conclusion is not accurate. For that reason the site qualifies for inclusion in the sewer service area. Based



on other developments adjacent to the site, there is water and sewer service available in the area, as well as other public utilities such as electric, telephone, and communications.

This report disagrees with the above conclusion as described below.

Public Sewer

The Cunliffe report discusses the lack of available sewer service. As indicated in the Cunliffe report, Lot 12 is located outside of the Township's mapped Sewer Service Area and a "Will Serve" letter has not been provided. Public sanitary sewer infrastructure along the Red Hill Road property line also is not available. As further explained, to develop the site with high density multi-family housing such as the proposed 70 units, a developer will need to obtain approval from Township of Middletown Sewerage Authority (TOMSA), Monmouth County and the NJDEP to amend the current Monmouth County Water Quality Management Plan and include the property lot in TOMSA's current service area.

The report continues to explain that, *"In accordance with the New Jersey Water Quality Management Planning rule at N.J.A.C. 7:15-3.3(b), site specific amendments are limited to proposed alterations to the eligible SSA needed to address a specific project or activity. An application for amendment must be made to both the NJDEP and to the Monmouth County Planning Board Amendment Review Committee (ARC), concurrently."* The Cunliffe report continues, *"Pursuant to N.J.A.C. 7:15-4.4, NJDEP shall determine areas eligible for sewer service in accordance with several provisions, including but not limited to the following: Pursuant to N.J.A.C. 7:15-4.4(e)1, the Department shall consider Areas mapped as endangered or threatened wildlife species habitat as identified on the Department's Landscape Maps of Habitat for Endangered, Threatened or Other Priority Wildlife as Rank 3, 4 and 5."*

The Cunliffe report then recognizes the data provided by Princeton Hydro's analysis. *"According to the Environmental Resource Inventory prepared by Princeton Hydro for the site, dated September 2024, 'Per the Landscape Project, approximately 90% of the Site was classified as either Rank 1 or 3 T&E species habitat. Rank 3 habitats were identified throughout the majority of the Site with the exceptions being the extreme northwest and southeast portions. The Site's Rank 3 habitats were comprised of wetlands and/or riparian corridors and by their proximity to an observed occurrence of Black-crowned Night Heron (Nycticorax nycticorax), a threatened species in New Jersey.' The PH report also indicates the site may also contain habitat for the Red-headed Woodpecker (Melanerpes erythroccphalus). These findings will require further investigation by the NJDEP and could hinder the approval of a site-specific amendment."*

The Cunliffe report finds that the identification of the Rank 3 habitat will require further investigation by NJDEP that could hinder the approval of the sewer amendment. NJDEP would need to review and analyze the property and the proposal. Therefore, sewer service at the site is not guaranteed, which impacts the site being developable.

D. Suitable Site

The Cofone report says the following regarding the Lot 12 being a suitable site, *"Suitable: An inclusionary development would be compatible with the surrounding land use context of residential, office, and vacant land uses. There is direct access to multiple roadways that feed into the local and regional road network, including the proximate Garden State Parkway. The site is also within walking distance to Memorial Sloan Kettering Cancer Center Monmouth, a major employer, and a quick drive to Bell Works, another employer."*



The proposed gross density of approximately 27.13 dwelling units/acre is appropriate and less than the approximately 32.31 gross dwelling units/acre contemplated in the North Middletown Redevelopment Plan as previously approved by the Board. From a site planning perspective, there is an appropriate amount of open space proposed on the site, which is clear evidence of the site not being overdeveloped. The site is not within a flood zone.”

This report disagrees with the above conclusion. Affordable housing is best suited for environments and locations that provide access to services, transportation and employment. The subject property is not located in a pedestrian friendly area with public transportation and access to employment or services. Instead, the subject location is remote and unsuited for the proposed multifamily residential development.

We note the following additional reasons that the site is not suitable for the development.

Location

Lot 12 is situated in an R-45 zone district, in an area that is generally characterized by low density residential development, a religious use, farmland and open areas. The exception is the Memorial Sloan Kettering Cancer Center which is located close to the subject property and situated in an OR/Office Research Zone District. The property is situated adjacent to a conservation easement of approximately 18 acres.

The 70 unit multifamily inclusionary development is not appropriate for the location and is not compatible with the adjacent and nearby low density uses. The proposal is not suitable for the area and does not represent sound planning.

Lack of Public Transportation

Per the Cunliffe report, the site lacks realistic pedestrian access to sidewalks within the public ROW and to public mass transit hubs. The Middletown Train Station of NJ Transit's North Jersey Coastline is located over 2.8 miles from the site. As stated in the Cunliffe report, *“The vertical and horizontal geometry, lack of sidewalk and lack of sufficient paved shoulder make this generally unsafe for regular commuting purposes.”*

Furthermore, the Academy Commuter bus stop in Red Bank is more than 5.4 miles from the subject property, which is in excess of a one hour and 45-minute walk and 28-minute bicycle ride. The closest NJ Transit Bus stops are located more than 2.5 miles from the site along the Route 34 and 35 corridors. The Cunliffe report explains that travel distances and travel times for both pedestrians and bicyclists differ based on the bus stop location. The report explains that, *“The closest bus stop that could be found along the Route 34 corridor is at the intersection of Lloyd Road in Aberdeen, which is 5.0 miles and a 1 hour, 49-minute walk,”* and *“The closest bus stop that could be found along the Route 35 corridor is at the intersection of Monmouth Road in Middletown, which is 3.3 miles and a 1 hour and 10-minute walk.”* The Cunliffe report provides corresponding exhibits, labeled as Exhibits “E.”

We note that the lack of public transportation is important because residents would need to have an automobile to travel to their places of employment, and shop for groceries and other necessities.



However, we assume that 11 of the 70 units will be affordable, with a minimum of three (3) of the affordable units being three-bedroom units. Per the 2024 income guidelines prepared by the Affordable Housing Professionals of New Jersey, in Region 4 (in which Monmouth County is located), the income levels for a family of four individuals are: \$104,043 for moderate income families, \$65,027 for low income families, and \$39,016 for very low income families. Therefore, a family of four with a total income level of \$65,000 could be living in one of the three-bedroom apartments; it could be challenging for that family to afford an automobile, as well as gasoline, insurance and repair costs. We note that a car would be needed in this location for transportation to employment due to the lack of available public transportation. An automobile would also be needed for access to a supermarket, pharmacy, and other services.

Finally, as previously stated, the development proposal does not contain sufficient parking per RSIS standards, and the lack of onsite parking cannot be addressed by the residents using public transportation, as none exists in the area. In other words, residents will not be able to travel by mass transit, and will need an automobile, but the development scheme does not include sufficient parking for the residents' automobiles.

As a general planning practice, it is preferable to locate affordable housing in areas where transit is available to avoid dependence on an automobile, as well as the resulting associated costs. The lack of transportation options results in the property not being suitable.

Access to Employment and Services

The Cofone report states that the site is within walking distance to Sloan Kettering, but we note that the environment is not pedestrian friendly, with Red Hill Road curving and not containing sidewalks. Memorial Sloan Kettering is also only one employer center that offers specialized services that necessitate specific educational and professional skills. Such specific educational and professional skills limit the employment opportunities at the Sloan Kettering site. This limitation is in contrast to other employment centers, such as a shopping center or retail or personal service establishments, that could offer a variety of employment opportunities.

We note that there are no other employment centers within walking distance to the site. Via a Google Map analysis, Bell Works, which is cited in the Cofone report, is over a 30 minute walk from the subject property, with sidewalks not available for approximately 13 minutes of the walk. The lack of access to available employment options located proximate to a development containing affordable units is not sound planning.

Further, the subject property is not within walking distance to other similar services such as a grocery store, shopping mall, pharmacy or even the Middletown municipal building. These walking distances are shown in Exhibit A and described as follows:

- A Google search revealed that the closest grocery store is the ShopRite of Kings Commons, which is located 3.2 miles, and is a one hour and seven minute walk, from the site. We note that this route requires that pedestrians cross the Garden State Parkway. Based on aerial imagery, it appears that there is a pedestrian crossing over the Garden State Parkway. However, according to 2019/2021 Google Street View imagery and June 2024 NearMap imagery, there are no



connecting sidewalks, crosswalks, or even shoulders along the approaches to the Red Hill Road overpass.

- A Google search revealed that the closest pharmacy is the Holmdel Village Pharmacy, which is located 3.2 miles, and is a one hour and nine minute walk, from the site.
- A Google search revealed that the Middletown Township Municipal Building is located 3.8 miles, and is a one hour and 22 minute walk, from the site. This walk also requires pedestrians to cross the Garden State Parkway.
- A Google search revealed that the Commons at Holmdel is located 4.6 miles, and is a one hour and 38 minute walk to the site. This walk also requires pedestrians to cross the Garden State Parkway.

While the above examples were given as being located far from services, we note that they are all also potential employment centers that would, if accessible, be employment opportunities for residents. However, they are not viable options as services or employment for residents unless they own an automobile. As previously explained automobile ownership may not be financially viable for all residents, in particular for the residents of the affordable units. However, without an automobile, residents will not have access to employment or services.

In addition to the financial challenges of automobile ownership, the site is significantly deficient in parking. Therefore, there is a conflict because residents will need automobiles for transportation to employment and for shopping, but there will not be enough parking spaces at the development to park all of the residents' automobiles, as well as visitors' automobiles.

The subject property is located in a remote area that does not have access to employment or services. Due to the lack of accessible employment opportunities and access to services, the site is not suitable for location of affordable housing; locating the development project at the subject site is not sound planning.

Environmental Resources Inventory (ERI)

We have reviewed the Environmental Resource Inventory report prepared for the subject property by Princeton Hydro, dated September 2024 (referred to as the "ERI"). The ERI offers the following conclusions in its Executive Summary:

Per Page ii of the ERI, the proposed multifamily housing:

- Would require the removal of permeable land and replace it with impervious surfaces (e.g. roads, buildings) and other less-permeable surfaces (e.g. lawns and other landscaped areas).
- Would likely require the removal and fragmentation of intact, developing forest.
- Would likely require the removal of small to mid-sized trees and other understory vegetation.
- Would likely require the disturbance of currently stable, steep slope areas.

Per the ERI, the site modifications listed above would result in the following:



- Are reasonably likely to increase local stormwater runoff, increase non-point source pollution, and decrease local groundwater recharge capabilities, which may result in the indirect degradation of downstream open waters and associated wetlands, depending on mitigating design features and best management practices.
- Are reasonably likely to reduce the quality and value of existing forest habitat by reducing total forest area, interrupting natural forest development, reducing wildlife by habitat capacity, increasing forest vulnerability to disturbance and invasive species and decreasing other valuable environmental services provided by forest vegetation, such as stormwater runoff reduction.
- Are reasonably likely to disturb steep slopes, decrease slope stability, and increase local soil erosion and runoff, which may in turn degrade the water quality of downstream open waters and associated wetlands, depending on inclusion, design, and maintenance of mitigating design features and best management practices.

Therefore, the ERI concludes that, “to a reasonable degree of professional certainty, it is likely that high density development of this Site would be detrimental to the local environment by reducing and degrading environmental resources and environmentally sensitive areas.”

Based on the above findings of the ERI, from a planning perspective, the proposed multifamily development is not sound planning or appropriate for the property.

CONCLUSION: The proposed development does not meet the definition of approvable, developable or suitable, and also is not sound planning, for the reasons listed herein.

Master Plan

In addition to the site not being suitable, approvable or developable, we also note that the development conflicts with the Township's Master Plan.

The Township of Middletown's 2004 Master Plan Existing Land Use Map and Future Land Use Map both designated Block 1045, Lot 12 as Residential Land Use. The 2004 Master Plan Land Use Element describes the Residential Land Use as being the most predominant land use in Middletown. Specifically, the densities in the R-45 Zone have been the traditional development pattern in the Lincroft, Fairview, and Chapel Hill sections of the town.

The Township of Middletown's 2023 Master Plan Reexamination Report includes a 2023 Amendment to the Middletown Township 2008 Housing Element and Fair Share Plan, which includes the following, *“There were sites identified in the 2008 Housing Element and Fair Share Plan as not necessarily ‘unsuitable’ for affordable housing, but instead exhibited limitations that do not bring them to the forefront at this time. As indicated below, the status of these sites has changed and with this Amendment, have been updated, and new sites added, exhibiting similar limitations.”*

This section of the report identifies that, *“The Red Hill Road site (Block 1045, Lot 12) is currently vacant and utilized as informal and illegal storage of vehicles and landscape equipment. This site is not large, containing just over 2 acres, and environmentally sensitive features such as steep slopes. All potential residents at this site would be entirely dependent on personal vehicles due to the site’s remote location from public transportation.”* Lack of available parking has been referenced several times in this report



and has been cited as reasons why the development scheme is not approvable or suitable, and does not represent sound planning.

Middletown's 2023 Reexamination Report also included an amendment to the Middletown Township Open Space, Recreation and Conservation Master Plan Element. The amendment includes a list of sites, of which one of the sites is the subject property, for which the plan states that, *"This property could be suitable for limited active recreational uses as a portion of this site is level and cleared. The rear portion of the site is in its natural, undeveloped state and contains steep slopes and wetlands, and suitable for preservation."*

Finally, we note that Township Ordinance 2023-3371, approved on June 5, 2023, *"has determined it necessary to acquire lands and premises identified as Block 1045, Lot 12 (490 Red Hill Road)...which is necessary for maintaining open space and enhancing public recreational opportunities."* The ordinance further identifies Lot 12 as an *"...undeveloped, partially wooded lot, adjacent to an existing conservation easement, with environmentally sensitive steep slopes, and is necessary to enhance open space and/or recreation opportunities within the Township..."*

Further, in the November 2023 affidavit of Anthony Mercantante, he states, *"During Middletown's meetings with FSHC, at no point did FSHC propose that Middletown rezone ...Block 1045, Lot 12 (the "Red Hill Road site") for high-density development, or any development whatsoever. These sites are comprised of dense woodlands, environmentally sensitive steep slopes, and they are not proximate to public transportation, jobs, shopping or services. ...The Red Hill Road site appears to lack any sewer service, is adjacent to an existing conservation easement, and contains very little developable acreage."*

In conclusion, the Township's recent master planning and other efforts have identified Lot 12 as not being appropriate for affordable housing due to its location and constraints, and have further determined that the site is appropriate for open space and chooses to acquire it for such future use.

Redevelopment Plans

Finally, the Cofone report references other Middletown Redevelopment Plans. We note that a Redevelopment Plan is site specific and designed for the designated property. To that end, the Port Belford and North Middletown Redevelopment Plans are not comparable to the subject property. For example, the Port Belford Redevelopment Plan covered approximately 384 acres in land area, and is comprised of 46 tax parcels. The purpose of that plan as follows, *"The purpose of this Redevelopment Plan is to set forth a plan to enhance and revitalize these critical parcels located along the Township's beachfront area."* The redevelopment plan divides the site into multiple sub-districts, and mixed use is among the permitted uses.

The above facts are relevant because the plan is not comparable to Lot 12. The Redevelopment Area is much larger in area than Lot 12, and addresses the beachfront area and permits mixed use. The proposed development scheme is not in the beachfront area, does not promote mixed use, and is not located in a mixed use area.

Similarly, the North Middletown Redevelopment Plan states that, *"The North Middletown Redevelopment Area is situated along Port Monmouth Road and Ocean Avenue. Surrounding the site is neighborhood*



commercial and residential uses. The vision for this area is to create a mixed-use building with retail and townhouse house style residential units on the ground floor and apartment style residential units on the upper floors.” The North Middletown Redevelopment Area is not comparable to the subject property or surrounding area; neither Lot 12 nor the surrounding area contains neighborhood commercial or residential uses. The proposed development scheme for Lot 12 also does not create a mixed use environment.

Conclusion

Our review of the Concept Plan, planner’s report, and other information provided in support of the proposed development scheme results findings that the proposal does not represent sound planning and does not meet the definitions of approvable, developable or suitable.

The property is not sound planning due to:

- The site’s remote location;
- Lack of available public transportation;
- Need for residents to have an automobile, including the affordable households;
- Lack of available and accessible employment, shopping and services;
- Site design resulting in a portion of the building being below grade;
- Site circulation that does not provide safe circulation for the Township’s fire vehicles;
- Parking deficit per RSIS;
- Findings of the Environmental Resources Inventory.

The development proposal is not approvable due to:

- Site design resulting in portions of the building being constructed below grade which does not conform to Code;
- Insufficient parking per RSIS standards;
- Steep slope disturbance;
- Site circulation that does not provide safe circulation for the municipality’s fire trucks.
- The development proposal does not conform to Monmouth County Site Access standards.

The development proposal is not developable due to:

- Lack of sewer service, which is subject to outside review and approval.

The development proposal is not suitable due to:

- Location in a remote area that does not offer public transportation opportunities;
- Location that is not compatible with surrounding uses;
- Lack of access to employment, shopping and services;
- Findings of the Princeton Hydro ERI.

Finally, we note that the proposal is not in conformance with the Township’s master planning efforts.



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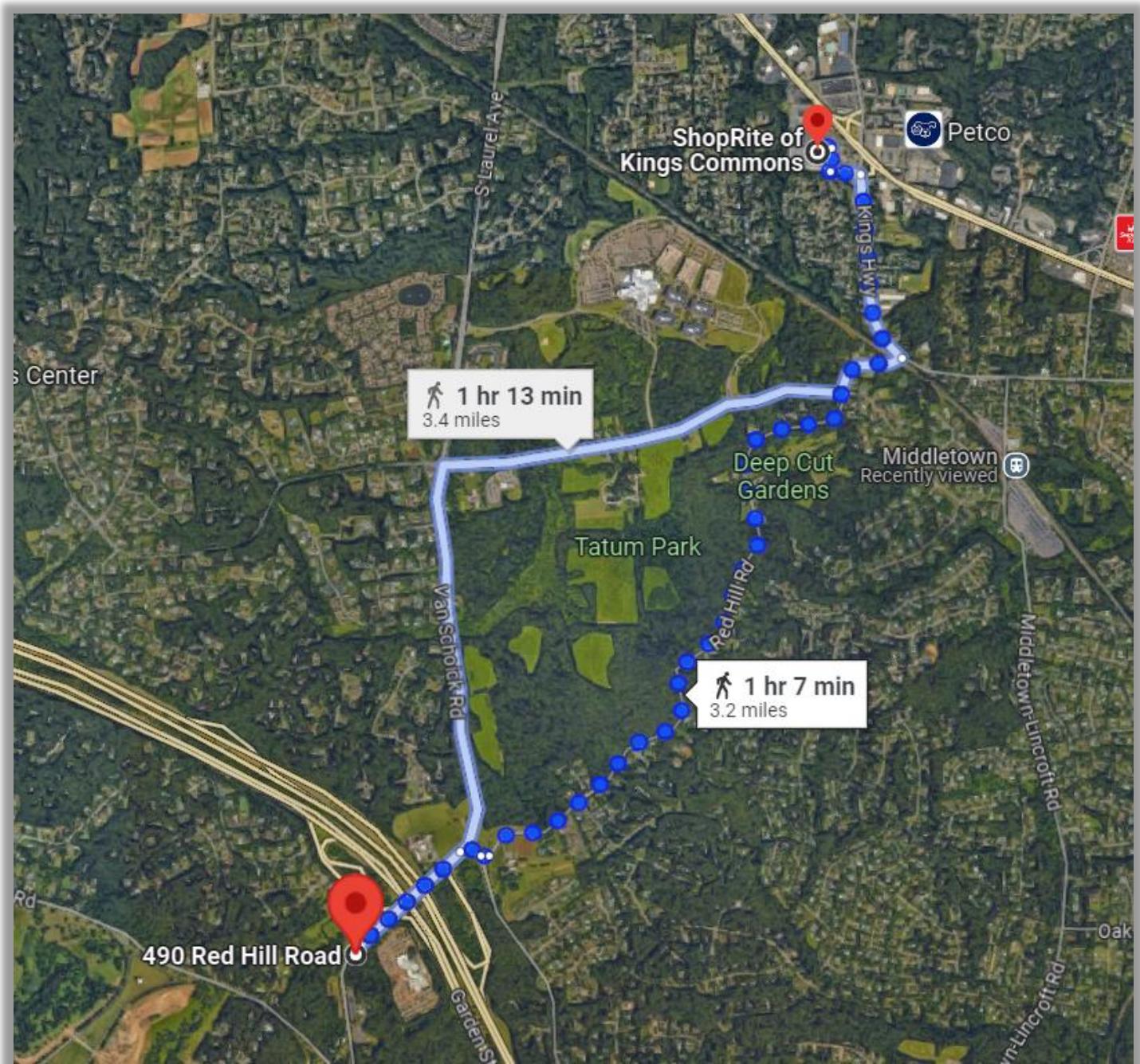
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EXHIBIT A – Walking Distances



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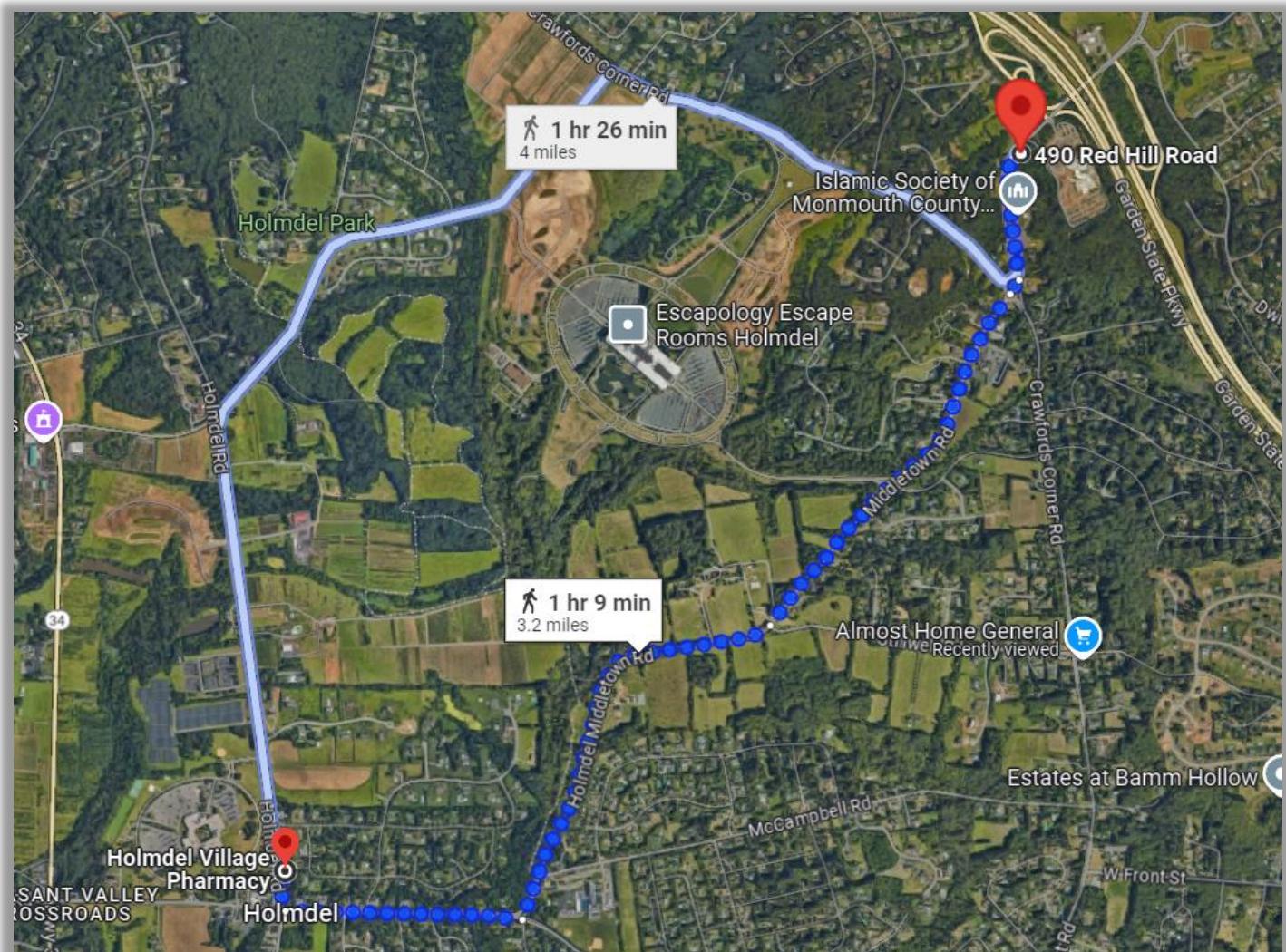
Walking Distance to ShopRite of Kings Commons





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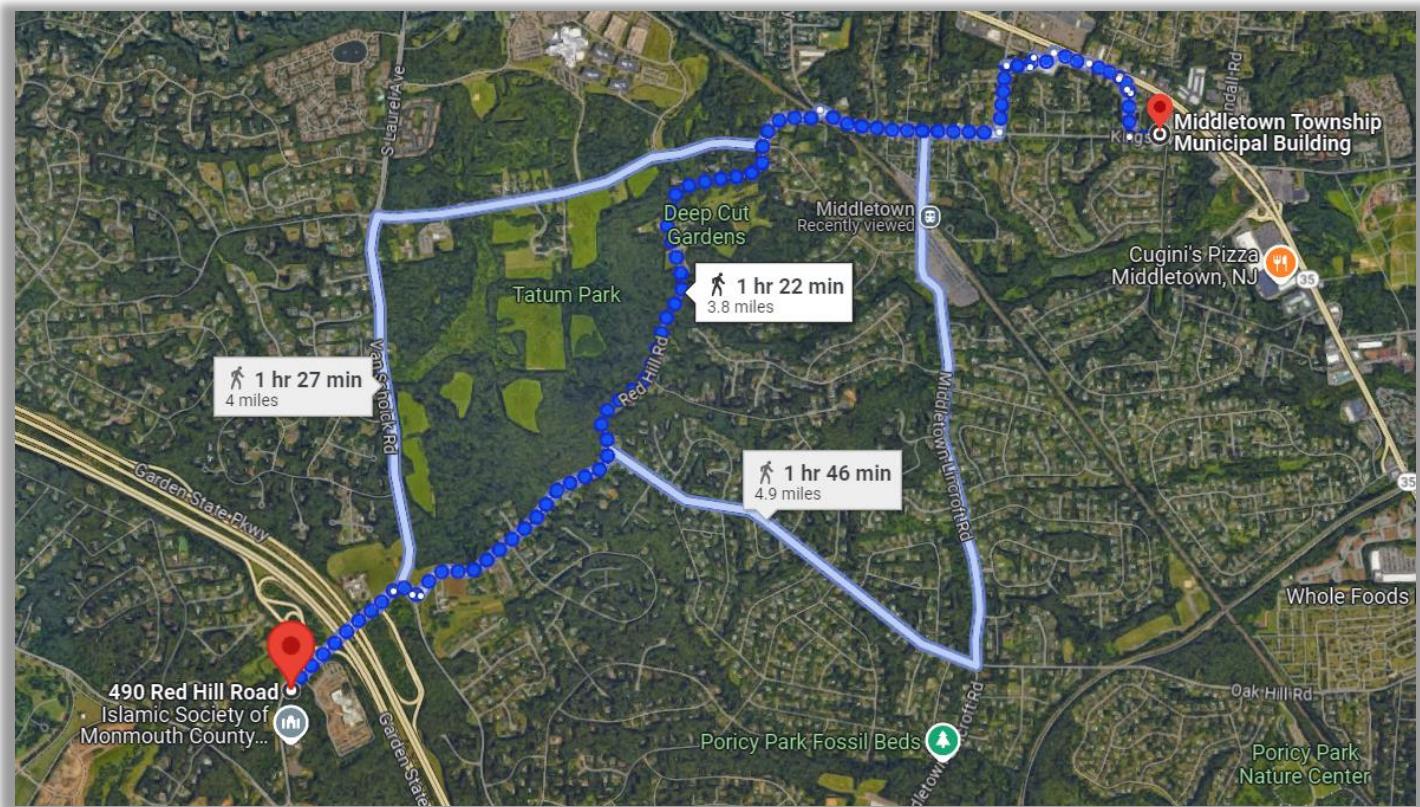
Walking Distance to Holmdel Village Pharmacy





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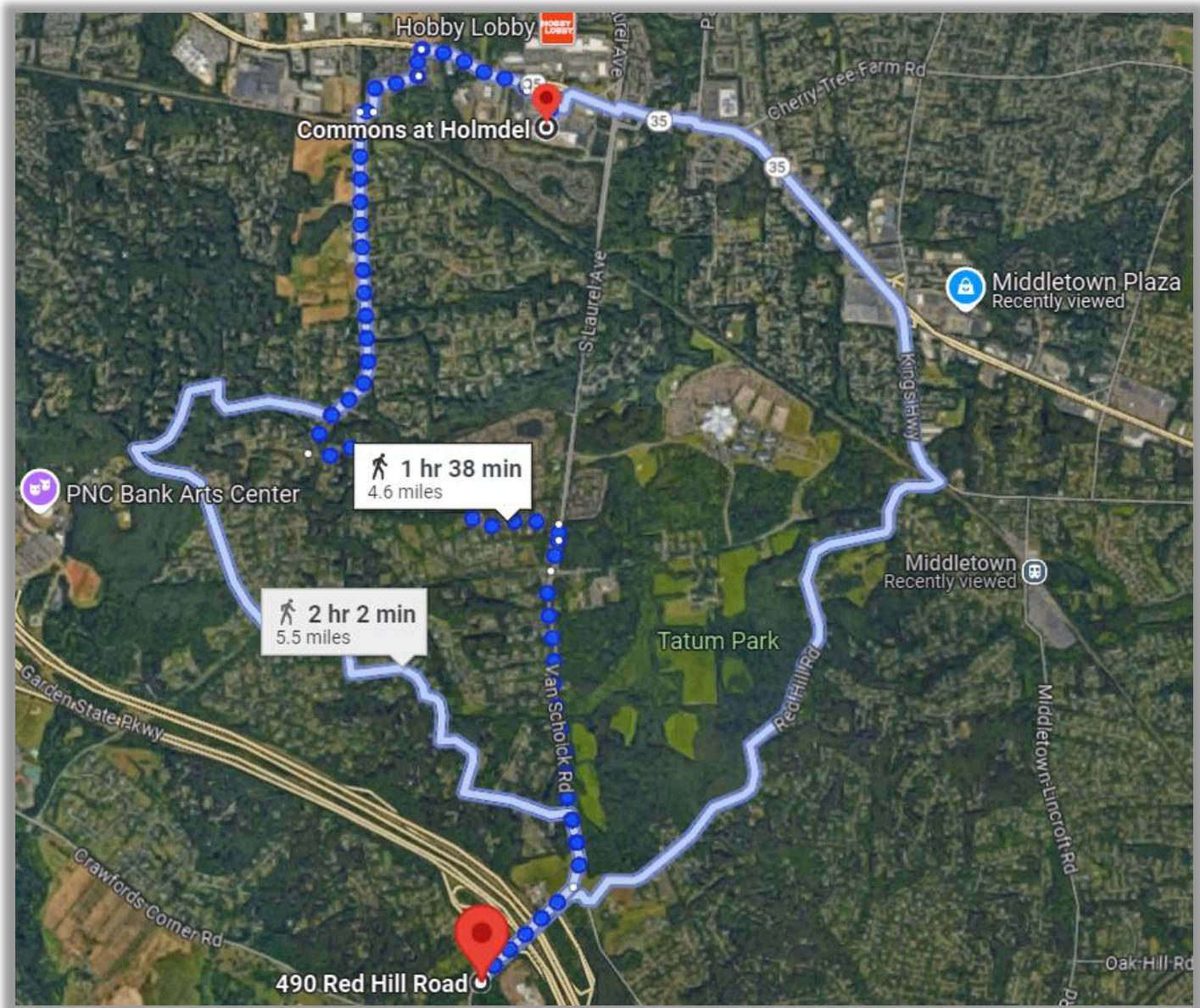
Walking Distance to Middletown Township Municipal Building





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Walking Distance to Commons at Holmdel





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EXHIBIT B – Resume of Caroline Reiter, PP/AICP



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Caroline REITER, PP, AICP

Planning Group Manager



Education

Rutgers University – Edward J. Bloustein School, MCRP, City and Regional Planning, 1995

State University of New York at Albany, BA, Political Science, 1990

Professional Registrations/Affiliations

Licensed Professional Planner in New Jersey (PP)

American Institute of Certified Planners (AICP)

American Planning Association, Member

New Jersey Planning Officials Member

Affordable Housing Professional Certification – Rutgers University + Affordable Housing Professionals of NJ

Years in the Industry

30

Areas of Expertise

Land Use; Master Planning; Affordable Housing; Municipal Board Planner; Expert Testimony; Redevelopment; Open Space & Recreation Planning; Ordinance Preparation; Demographic Analysis

Summary of Qualifications

Ms. Reiter is a highly results oriented planning professional with 30 years of proven experience in both the public and private sectors. She has successfully completed many municipal planning projects including Master Plans and Reexamination Reports, Housing Elements/Fair Share Plans and demographic analyses. As a licensed Planner, Ms. Reiter has testified before New Jersey planning and zoning boards and provided technical support to many boards. She has also been accepted as an Expert Witness by land use boards in the States of New Jersey and New York, as well as New Jersey Superior Court.

Ms. Reiter currently serves as both a general planning consultant and an affordable housing planning consultant to several municipalities in New Jersey. Throughout her career, she has established many creative zoning ordinances on affordable housing, mixed use development, floor area ratio, impervious coverage, setbacks and age-restricted housing. She has also developed planning analyses with subcommittee recommendations and public involvement. Ms. Reiter has prepared master planning documents, affordable housing plans and redevelopment studies and plans.

Representative Municipal Appointments (Current)

Borough and Board Planner, Borough of Caldwell

Borough Planner, Borough of Closter

Affordable Housing Planner, Borough of Closter

Borough and Board Planner, Borough of Emerson

Affordable Housing Planner, Borough of Emerson

Redevelopment Planner, Borough of Emerson

Board Planner, Borough of Fanwood

Borough and Board Planner, Borough of Haworth

Affordable Housing Planner, Borough of Haworth

Borough Planner, Borough of Kceansburg

Board Planner, Keyport Unified Planning Board

Borough and Planning Board Planner, Borough of Oakland

Borough and Board Planner, Borough of Oradell

Affordable Housing Planner, Borough of Oradell

Board Planner, Borough of South Plainfield

Board Planner, Borough of Union Beach Planning Board

General Planning Consultant, Township of Wayne

Affordable Housing Planning Consultant, Township of Wayne

Areas of Expertise + Key Projects

Municipal Board Planner. Over 25 years of experience serving as Planning Board and/or Zoning Board planner to a variety of municipalities across the State. Recent appointments include the Boroughs of Caldwell, Closter, Oradell, Haworth and Emerson and the Township of Wayne. Reviews all applications and provides comprehensive planning and review reports, as well as planning testimony at Board hearings to assist Board members with their review of applications.

Master Planning. Lead Author of extensive Reexamination Reports and Master Plan Elements for many municipalities with recent work in the Boroughs of Emerson, Closter and Haworth and the Township of River Vale. Existing zoning was evaluated to determine what adjustments to permitted uses and bulk standards would incentivize



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revitalization without jeopardizing the desirable scale and character of the area. All master planning documents are prepared to be unique to the municipality with specific recommendations for the future. In Fanwood, Ms. Reiter is leading the preparation of a new Master Plan. She is guiding the Master Plan Subcommittee through the process of creating a new Statement of Goals and Objectives and Land Use Plan. She is also assisting with the preparation of other plan elements, including the Historic Preservation and Green Buildings and Environmental Sustainability Plans. Ms. Reiter led a well-attended and successful public information session on the Master Plan to engage the community in the process.

Zoning and Design Standards. Creation of ordinances and regulations to address master plan goals and objectives with a focus on meeting a municipality's specific needs and future development goals. Recent work includes a study of Emerson Borough's nonresidential zones based on Master Plan recommendations for shopping centers and other nonresidential uses. Ms. Reiter has also prepared ordinances that address floor area ratio, impervious and lot coverages, permitted uses, age-restricted housing, mixed-use and affordable housing. Additionally, recognizes that the municipal response to the rapid economic and health changes in our community due to the pandemic and the changes in office and retail markets requires town-specific sensitive and creative approaches to zoning and design regulations.

Redevelopment Planning. Prepared Redevelopment Studies for the Borough of Keansburg, the Township of Hamilton (Mercer County), the Borough of Caldwell and the Jersey City Redevelopment Agency (JCRA) In Keansburg, the Study recommended designation of a two-lot site as an Area in Need of Redevelopment. In Hamilton, the Study recommended two properties, both of which contained vacant buildings, as an Area in Need of Redevelopment. Ms. Reiter prepared a scattered sites study for the JCRA and also consulted with City staff regarding her analysis. Ms. Reiter testified at the Planning Board hearings for all of the Redevelopment Studies and testified on the report content and recommendations for all sites. She also presently serves as the Redevelopment Planner for the Borough of Emerson. Reviews all plans and proposals for a designated redevelopment area to confirm that they follow the Redevelopment Plan and municipal approvals.

Expert Witness Testimony. Accepted as an expert in the field of Planning before land use boards in New Jersey and New York states, as well as in Superior Court of the State of New Jersey. Provides planning testimony to assist land use board members as they review applications. Testifies on behalf of developers and property owners in favor of and in opposition to development applications. Ms. Reiter has testified in Superior Court numerous times on behalf of municipal and public clients.

Conflict Planner. Provides planning services to municipalities as needed and when the town's planning consultant has a professional conflict. Examples include review of land use board applications and preparation of planning studies.

Master Plan, Fanwood Borough, Union County, NJ. Guiding the Master Plan Subcommittee in preparing a draft of a new Master Plan. Led a well attended public information session on the master plan process. Presently development new Goals & Objectives and a Land Use Plan with the subcommittee members.

Master Plan, Wayne Township, Passaic County, NJ. Presently guiding the Master Plan Steering Committee through the introductory process of preparing a new master plan. Ms. Reiter is managing a team of multiple subconsultants to address Wayne's goals, including a full review of the Township's commercial corridors and a robust public engagement process.

Recreation & Open Space Plan, River Vale Township, Bergen County, NJ. Principal author of River Vale Township's Recreation and Open Space Plan that was required for Green Acres funding. The plan inventoried the Township's recreation and open space area and updated goals and objectives for future projects. The plan also analyzed River Vale's existing parks and recreation areas, as well as areas dedicated to conservation use. The town's Joint Planning Board adopted the plan as part of the Township's Master Plan. The plan included specific goals for park, recreation and public space connectivity. Caroline also updated the Township's Recreation and Open Space Inventory (ROSI) to include all parkland, recreation and open space areas.

Zoning & Master Plan Analysis, Borough of Emerson, Bergen County, NJ. Analyzed options for strengthening the town's nonresidential zone districts, with recommendations for new uses to help strengthen the "brick and mortar."



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Planning Group Manager



commercial areas, in particular the shopping malls that were experiencing vacancies. Prepared a new Master Plan Reexamination Report to address the Borough's nonresidential zones, with recommendations for updated and current uses in the commercial and office zoning districts. After adoption of the Reexamination Report, prepared zoning ordinances to implement the recommendations in the Reexamination Report.

Master Plan Reexamination Report, River Vale Township, Bergen County, NJ. Prepared the Master Plan Reexamination Report for River Vale Township. The analysis recommended a significant zoning change for a large country club and golf course property. The Reexamination resulted in a new residential/golf course zoning recommendation with an affordable housing component. Upon adoption of the Reexamination Report, prepared the zoning ordinance to implement the recommendations from the report. This Master Plan recommendation and subsequent land use ordinance allowed for the 18-hole golf course to remain open, while offering new housing opportunities that include an affordable housing set-aside. The property and affordable units were included in the Township's Settlement Agreement with the Fair Share Housing Center.

Master Plan Reexamination Report, Closter Borough, Bergen County, NJ. Guided a subcommittee through the Master Plan Reexamination Report process. Reviewed goals for the Reexamination Report and ways to include the public in the process. Steered the subcommittee toward preparation of a plan with unique and specific planning goals and recommendations for Closter Borough, including recommendations for the Borough's commercial and industrial zone districts.

Planning Consultant, Wayne Township, Passaic County, NJ. Managed all Township planning assignments and functions for approximately one year in the absence of a Township Planner. Reviewed all land use board applications for completeness and conformance reviews. Prepared planning reviews for all Planning Board and Board of Adjustment applications. Organized land use application tracking procedures for the Township Planning Department. Recommended ordinance revisions to Township Administration. Continue to assist the new Township Planner with preparation of completeness and planning reviews as needed.

Planning Consultant, Borough of Oradell, Bergen County. Serves as the Planner for the Borough, Planning Board and Zoning Board of Adjustment. Reviews development applications for both boards. Prepared a new sign ordinance that provided current sign regulations to meet a variety of goals in Oradell's commercial zones. Prepares planning reports and provides testimony at board hearings. Prepared an amendment to the Borough's Housing Element and Fair Share Plan and an Amended Spending Plan. Prepares planning studies, including future development options, for specific properties. Analyzes and advises on zoning and land use recommendations from the current Master Plan. Prepare affordable housing zoning ordinances. Reviewing zoning ordinance and recommending updates to keep the ordinance current and consistent. Prepared required affordable housing Midpoint Review.

Planning Consultant, Township of River Vale, Bergen County, NJ. Provides planning services to the Township and the Joint Land Use Board. Reviews land use applications for completeness. Provides planning reviews and testimony for land use board applications. Prepares land use ordinances, including ordinances on definitions, coverages, setbacks and permitted uses. Assisted with updating the Township's Zoning Map. Guided the Master Plan Subcommittee through the preparation of a new Master Plan Reexamination Report that is unique to River Vale, with specific recommendations on land use, open space, connectivity, and future sidewalk locations. Prepares ordinance consistency review memos and all year end reports on variance decisions.

Planning Consultant, Borough of Closter, Bergen County, NJ. Guided the Borough's Master Plan Subcommittee through the preparation of its required Master Plan Reexamination Report. Met with the Borough's Chamber of Commerce and business leaders to discuss opportunities in the Borough's nonresidential zone districts. Review applications before the Borough's Planning Board.

Planning Consultant, Borough of Emerson, Bergen County, NJ. Provides planning analyses for the Borough and the Joint Land Use Board. Prepares zoning ordinances, including revising the permitted uses for the nonresidential zone districts, as well as revisions to coverage and bulk requirements. Oversaw the preparation of a new Zoning Map for the Borough. Prepared a new Reexamination Report for adoption by the Joint Land Use Board. Prepares the Land Use Board's annual report on variance decisions. Reviews Land Use Board applications.



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Redevelopment Planning Consultant, Borough of Emerson, Bergen County, NJ. Reviews all plans for Redevelopment project to confirm conformance with Emerson's Redevelopment Plan and approved project. Participates in mediation with developer and the Fair Share Housing Center.

Planning Consultant, Borough of Haworth, Bergen County, NJ. Prepared the Borough's Master Plan Reexamination Report that reflected Haworth's development characteristics and future goals. Identified properties to be included in Haworth's Recreation and Open Space Inventory (ROSI). Review applications and provide planning testimony for the Haworth Planning Board.

Public Visioning Sessions. Organized and provided a detailed and informative public visioning session in Fanwood to facilitate discussion of the Master Plan. The session was well attended and the audience was responsive. In Closter, aided in the organization and successful completion of public visioning session in Closter Borough, Bergen County. The public session was part of the master planning process and was a component of the preparation of the Master Plan Reexamination Report

Zoning Map Revisions and Updates. Currently the Project Manager for the preparation of a new Zoning Map for the Borough of Oradell and previously led the preparation of a new Zoning Map for the Borough of Emerson. Reviewed the zoning ordinance to confirm that all ordinance revisions were included in the new map. Recommended drafting, color and pattern selections so that the map would be legible and easy for residents to read and use.

NJ TRANSIT, Project Manager. Project Manager for several planning consulting projects, including the Statewide inventory of all NJ TRANSIT and NJDOT park/ride facilities. Each park/ride site was mapped to show available commuter parking. The resulting maps and documentation are available on the NJ TRANSIT website. Also, analyzed potential stops and routes for a Bus Rapid Transit (BRT) project providing potential connections to and from Montclair State University.

NJ TRANSIT, Planning Analyses. Prepared land use analyses of properties owned by NJ TRANSIT on behalf of their Real Estate Department. Reviewed and analyzed zoning ordinances and redevelopment studies for municipalities as directed by NJ TRANSIT.

NJ TRANSIT, Expert Testimony, Middlesex County, NJ. Provided expert testimony in Middlesex County Superior Court at a juried trial on behalf of NJ TRANSIT for the condemnation of lands in connection with the Edison Rail Station. Expertise in the case was in land use the local master plan, transit villages and potential use of the lands to be acquired.

NJ TRANSIT, Expert Testimony, Passaic County, NJ. Provided expert testimony for the condemnation of real estate for a commuter parking for the Wayne/Rt. 23 Transit Center on behalf of NJ TRANSIT. Also provided testimony regarding the site's environmental constraints that limited the property's use. Examined potential land use options upon which the State's appraiser provided valuation.

Borough of Hillsdale, Bergen County, NJ. Served as the Hillsdale Borough and Planning Board Planner for several years. Reviewed all Planning Board applications for completeness. Provided planning analyses, support and testimony as needed. Provided technical support to the Planning Board, as well as planning report and guidance at public hearings. Prepared a new Master Plan for the Borough, as well as required Master Plan Reexamination Reports. Prepared multiple Housing Elements and Fair Share Plans to address the Borough's affordable Housing obligation under COAH rules. Prepared several land use ordinances, including Floor Area Ratio, impervious coverage, age-restricted housing, and affordable housing.

Bergen County Bar Association, Land Use Board Training Certification. Provided presentations on planning aspects of general land use, including application reviews, affordable housing, environmental issues, state planning, smart growth and the land use law.

Borough of Prospect Park, Passaic County, NJ. Prepared a planning study on the impact of the closing of an 80-acre rock quarry and the proposed new mixed-use development. The report included a fiscal impact analysis, as well as impacts on the municipal services, emergency services, utilities, affordable housing obligation and school facilities. The report with findings and recommendations was presented to Prospect Park governing body at a public hearing.



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Borough of Montvale, NJ. Prepared a land use study of existing commercial office zoning districts. The analysis was proposed for consideration of permitting structured parking decks and expanding gross floor areas. The study included recommendations for design standards and draft zoning ordinance language, as well as master plan recommendations.

Leonia Housing Authority, NJ. Prepared a zoning ordinance amendment to permit age-restricted housing in Leonia. Also prepared a planning analysis and report to support the draft ordinance amendment. The analysis included information on surrounding properties, existing zoning requirements, and the Borough's master planning documents.

Wireless Communication Development. Served as a planning consultant to a major Personal Communication Services (PCS) provider in the New York metropolitan area. Responsible for managing the carrier's zoning process in the Westchester, NY region. Caroline testified before municipal planning boards, prepared and coordinated development applications and advised on the most appropriate locations for the proposed wireless facilities.

Affordable Housing

Affordable Housing. Primary planner for the development of innovative compliance mechanisms and responses to affordable housing obligations. Directly involved in negotiating settlement agreements with the Fair Share Housing Center and developers. Prepares Vacant Land Adjustments for towns. Provides expert witness testimony in New Jersey Superior Court at Fairness and Compliance hearings. Has prepared Housing Element and Fair Share Plans and Amendments, including spending plans, affordable housing, inclusionary and overlay ordinances, associated administrative manuals and resolutions. Recent work for municipalities includes Wayne Township, Closter Borough, Haworth Borough, Oradell Borough and Emerson Borough. Works with municipal leaders to analyze existing land use patterns and characteristics and recommend appropriate locations and densities for affordable housing developments.

Midpoint Reviews of Affordable Housing Plan Implementation. Prepared statutorily compliant midpoint review of Housing Element and Fair Share Plan implementations in Emerson Borough, Oradell Borough, Closter Borough, Haworth Borough.

Affordable Housing Planning Consultant, Wayne Township, Passaic County, NJ. Work with the Township Planner, Administration and Affordable Housing Committee to identify appropriate locations for affordable housing. Prepare affordable housing ordinances, including for overlay zone districts and mixed-use districts. Prepare a Vacant Land Analysis. Participate in mediation session with the Fair Share Housing Center, developers and intervenors. Present at public information sessions on affordable housing. Testify at Fairness Hearings in Passaic County Superior Court. Preparing draft Housing Element & Fair Share Plan for future adoption by the Planning Board.

Housing Element & Fair Share Plan, Borough of Closter, Bergen County, NJ. Presently working with the Borough's Planning Board Committee on Affordable Housing to prepare the Borough for Round 4 obligations and anticipated compliance mechanisms. For Round 3 of affordable housing, guided the Affordable Housing Committee through the process of identifying appropriate locations and densities for affordable housing development and zoning. Prepared a Vacant Land Adjustment in response to the Borough's affordable housing obligation. Participated in mediation sessions with the Fair Share Housing Center and intervenors. Prepared the Borough's Housing Element and Fair Share Plan and Spending Plan. Prepared all affordable housing ordinances, including overlay zoning and mixed-use districts. Testified in Bergen County Superior Court at Closter's Fairness and Compliance hearings.

Massachusetts Ave. Affordable Housing Site, Haworth Borough, Bergen County, NJ. Assisted the Borough's Affordable Housing Subcommittee to identify a suitable location for affordable housing that would not impact the Borough's existing development patterns. Analyzed development options with the Borough, Fair Share Housing Center, developers, and a non-profit organization. Review schematic development plans. Prepared an affordable housing ordinance to permit inclusionary housing on the site selected by the Affordable Housing Committee.

Affordable Housing Planning Consultant, Borough of Closter, Bergen County, NJ. Led the Borough's Affordable Housing Committee to address Closter's affordable housing obligation. Prepared extensive vacant land mapping, as well as mapping of potential affordable sites. Identified appropriate locations and densities for affordable housing. Prepared the Borough's Housing Element and Fair Share Plan, Spending Plan, and affordable housing ordinances. Testified in Superior Court at the Borough's Fairness Hearing. Prepared affordable housing Midpoint Review.



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Affordable Housing Planning Consultant, Borough of Emerson, Bergen County, NJ. Presented at a Public Information Session on the new affordable housing legislation. Prepared the Borough's Spending Plan. Recommends future affordable housing mechanisms to the Borough Administration. Reviews all affordable housing options and alternatives with the Borough. Prepared the affordable housing Midpoint Review.

Affordable Housing Planning Consultant, Borough of Haworth, Bergen County, NJ. Presented at a Public Information Session on the new affordable housing legislation. Worked with the Affordable Housing Subcommittee to determine best locations and densities for affordable housing and how to address the Borough's affordable housing obligation. Prepared the Borough's Housing Element & Fair Share Plan, Spending Plan and affordable housing ordinances. Prepared affordable housing ordinances including overlay zones, and an affordable accessory apartment ordinance. Prepared the vacant land adjustment and oversaw the preparation of vacant and existing land use mapping. Testified in Superior Court at Haworth's Fairness Hearing. Participated in mediation sessions with developers and the Fair Share Housing Center. Prepared a Land Use Amendment and resulting ordinance to address rezoning of property for affordable housing. Review plans and prepare ordinance for the Massachusetts Ave. affordable housing site.

Affordable Housing Planning Consultant, Borough of Closter, Bergen County, NJ. Led the Borough's Affordable Housing Committee to address Closter's affordable housing obligation. Prepared extensive vacant land mapping, as well as mapping of potential affordable sites. Identified appropriate locations and densities for affordable housing. Prepared the Borough's Housing Element and Fair Share Plan, Spending Plan, and affordable housing ordinances. Testified in Superior Court at the Borough's Fairness Hearing. Prepared affordable housing Midpoint Review.

Affordable Housing Planning Consultant, Borough of Matawan, NJ. Advise the Borough's leadership and affordable housing attorneys on the Borough's affordable housing requirements. Recommend zoning and design options for a potential affordable housing site.