



Alaimo Group

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July 15, 2022

Mr. John Maloney, Chairman
Ewing Township Zoning Board
2 Jake Garzio Drive
Ewing, NJ 08628

RE: ZBA-22-002
Ewing Township – Mercer County
Full Tilt Labs, Inc.
Proposed Cannabis Facility
352 Eggerts Crossing Road
Block 214.19, Lot 4
Use and Bulk Variance
Preliminary and Final Site Plan Review #2
Our File No. A-0198-0072-000

Dear Chairman Maloney:

As requested, we have reviewed a Preliminary and Final Site Plan submission, consisting of the following:

- Plans entitled “Preliminary and Final Site Plan Application”, sheets 1 through 9, prepared by Princeton Junction Engineering, dated May 6, 2022, **revised July 8, 2022.**
- Architectural Building Elevations, Floor Plans and Sections, sheets A.1 through A.4 prepared by Shirk, LLC dated December 8, 2021.
- Land Use Development Preliminary and Final Major Subdivision Plats and Major Site Plans Checklists

The Architectural Plans are not signed or sealed.

I. GENERAL INFORMATION

Applicant: Full Tilt Labs, LLC
1 Eric Court
Lawrenceville, NJ 08648

Owner: SP Holdings Company, LLC
1 Eric Court
Lawrenceville, NJ 08648

- Consulting Engineers -

Civil • Structural • Mechanical • Electrical • Environmental • Planners

Proposal: The project proposes to construct a 1 story 60' x 150' (9,000 sf) building to be used for cannabis processing. The existing asphalt milling pavement will be used for employee and vehicle equipment parking. Five (5) 20'x20' concrete block storage bins are also included with the proposed improvements.

Zoning: R2 - Residential Zone

II. ZONING REQUIREMENTS

A. **Use:** The proposed cannabis processing use is not permitted in the R-2 zoning district. Therefore, a use variance is required.

B. **Area and Bulk Requirements:**

Item	Required	Existing	Proposed
Lot Area	10,000 sf	127,143 sf	127,143 sf
Lot Frontage	80 ft.	150 ft.	150 ft.
Lot Width	80 ft.	150 ft.	150 ft.
Lot Depth	110 ft.	847.58 ft.	847.58 ft.
Minimum Front Yard Setback	40 ft.	43.7 ft.	43.7 ft/
Rear Yard	35 ft.	405+ ft.	405+ ft.
Side Yard	10 ft.	4.6 ft. PC	4.6 ft/ V
Accessory Building			
Distance to Principal Building	20 ft.	20 ft.*	20 ft.*
Side Yard	5 ft.	7.1 ft.	7.1 ft.
Rear Yard	5 ft.	350+ ft.	20 ft.
Height	1 story/15 ft.	1 story	1 story/29.3 ft. V

PC – Pre-existing Condition V – Variance Required

*Scaled distance between existing office and detached garage. Should be confirmed to determine whether or not a variance condition exists.

Partially Addressed: The Zoning Data table shown on the plans should be revised to reflect the R2 zone requirements. **All existing nonconformities and proposed variances should be noted.**

We defer zoning, buffer and landscape comments to the Board Planner.

We have updated our comments in **bold**.

III. PERFORMANCE STANDARDS

A. **Land Development Ordinance**

1. Pursuant to Section 215-15 E(5)(a) of the Township's Land Development Ordinance, no driveway shall be located closer to a side or rear property

line than six feet. The existing asphalt driveway is located on the property line with adjoining Lot 14.

2. Pursuant to Section 215-15 E(5)(b) of the Township's Land Development Ordinance, off-street parking areas may be constructed no closer than three feet to a side or rear property line. Although the row of vehicle Equipment Parking spaces is delineated 8' from the northerly property line, the existing millings extend to the property line. Pinned concrete wheel stops should be provided to assure vehicle do not encroach into the buffer area. **The plans have been revised to show millings to be removed in the landscape buffer.**
3. Pursuant to Section 215-15 E(5)(c) of the Township's Land Development Ordinance, the driveway width at the street right-of-way line shall not exceed a width of 20 feet. The existing driveway entrance at Eggerts Crossing Road scales to 30 feet.
4. **Addressed:** Pursuant to Section 215-15 E(5)(c) of the Township's Land Development Ordinance, each driveway shall have a sight triangle as required in Article VII. A sight triangle should be delineated at the driveway entrance at Eggerts Crossing Road. Existing trees within the sight triangle should be shown on the plan and noted to be removed. Design requirements shall conform to Section 215-55 B(1)(b).
5. Proposed signage should be addressed by the applicant. We defer to the Board Planner with regard to signage comments.

B. Parking and Loading

1. The plan provides a parking schedule as follows:

Residential per Residential Site Improvement Standards (RSIS): 2 spaces
Landscaping Use: 5 employees (2 managerial and 3 employees) @ 1 space each = 5 spaces
Cannabis Use: 6 employees (1 managerial and 5 employees) @ 1 space each = 6 spaces
Proposed: 19 Parking Spaces; 25 Vehicle Equipment Parking Spaces

It should be noted that Section 215-36 of the Township's Ordinance does not provide parking criteria for Landscaping and Cannabis Use. The applicant should provide testimony to support the proposed number of parking spaces.

2. **Addressed:** The parking calculations indicate 17 spaces are provided. However, there are 19 spaces shown on the plans. In addition, number of proposed employee parking spaces identified at two locations is inconsistent with the actual number of spaces delineated. These discrepancies should be addressed.
3. **Addressed:** Section 215-36 C(4)(d) of the Township's Ordinance requires 24' wide driveways to accommodate two way traffic. The existing driveway between the residential building and the office building scales to 11' wide. A waiver is required. **A proposed 25' wide driveway is shown on the plan.**
4. **Addressed:** Section 215-55 A(1)(a) of the Township Ordinance states that the width of access drives or driveways shall be determined as part of site plan review depending on use, topography and similar considerations. A truck turning movement plan should be provided indicating turning radii at the entrance driveway at Eggerts Crossing Road, and trash removal access to the proposed waste enclosure. Access should be based on emergency vehicle use or the largest truck use, whichever is greater.
5. Section 215-55 A(1)(f) of the Township Ordinance states that the surface of any off-street parking and/or loading area shall be constructed with a permanent pavement of a type specified and approved by the Township Engineer. We have no objection to the use of millings for the proposed parking area. However, we observed from our Google Earth research that the existing asphalt driveway and parking area appears to be in disrepair. The applicant should address how the condition of the existing paved areas will accommodate an increase in vehicular traffic.
6. **Addressed:** Section 215-55 B(3) of the Township Ordinance states that the dimensions of driveways shall be designed to adequately accommodate the volume and character of vehicles anticipated to be attracted daily onto the land development for which a site plan is prepared. The table provided in this section indicates a required driveway width of 25' to 35' for commercial and industrial use. As previously stated, the existing driveway scales to 11' wide. The applicant should provide testimony in support of the existing driveway width.
7. **Addressed:** A proposed ADA parking space is located on the millings pavement area adjacent to the proposed building. This area is to be paved with asphalt such the ADA pavement markings will remain permanent. An ADA sign location should be provided at both ADA parking spaces. A detail of the ADA pavement markings should be provided on the detail sheet.

8. **Addressed:** The parking lot setback should be dimensioned from the side yard property lines.
9. Our Google Earth research has revealed that there are numerous vehicles randomly parked throughout the site. In addition, the milling area inconsistent with what is depicted on the plans. Testimony should be provided as to status of the vehicles and milling location.
10. **Addressed:** Bollards should be provided at the existing fuel tank area.
11. **Addressed:** A concrete pad should be identified at the waste enclosure consistent with the detail.
12. **Addressed:** The State now requires provisions for Electric Vehicle Supply/ Service Equipment (EVSE) and Make-Ready Parking Spaces to be at least one Make -Ready parking space if there will be 50 or fewer off-street parking spaces. No electric vehicle charging stations are shown on the plan. Compliance with this ordinance is required as it is New Jersey State mandated.

C. Pedestrian Circulation & Sidewalks

1. **Addressed:** Proposed sidewalk should be identified and dimensioned on the plan.

D. Traffic Report

1. A traffic report has not been submitted. The impact of the proposed development on Eggerts Crossing Road should be addressed.

E. Stormwater Management Plan

1. Since the project is not proposing an increase of impervious area more than a quarter of an acre, or disturbance greater than one (1) acre, the proposed application would not be considered a major development. Therefore, the application is not subject to the Stormwater Control Ordinance, and compliance with NJAC 7:8 is not applicable.
2. Proposed building downspout locations should be shown on the Site Development Detail plan and the architectural plans. An underground roof drain header pipe should be provided to connect roof leaders that discharge onto the milling pavement. The header pipe should discharge at the low point along the Lot 14 property line. **The plan has been revised to show proposed roof drains discharging at the existing swale located along the southerly property line. Rip rap should be provided to prevent erosion.**

3. Stormwater runoff generated by the millings pavement currently sheet flows onto adjoining Lot 14 drain towards an existing headwall with a twin 12" pipe system. The applicant should provide testimony regarding an existing drainage agreement with the owner of the adjoining lot. Confirmation should be provided that the existing pipe system can accommodate runoff from millings pavement area.
4. **Addressed:** The Site Development Detail plan identifies a 4" PVC pipe invert. The pipe should be delineated on the plan. **The revised plan indicates the pipe is to be removed.**

F. Grading

1. Approximately 1' of fill will be required to accommodate the proposed final pavement grade in the vicinity of the northeasterly building corner. Testimony should be provided as to whether or not fill and or millings will be imported to be used for grading purposes.
2. **Addressed:** Existing contour line 121 ties into the proposed northeasterly building corner spot elevation of 122.00. A proposed 121 contour line should be shown on the plan consistent with proposed grading in this area of the millings pavement. The proposed 121 contour line should extend to the open space area along the southerly side of the building consistent with the proposed open space grading.
3. **Addressed:** Proposed spot elevations should be provided at the millings pavement area within 10' of the northerly side of the proposed building to assure a minimum 1% pavement slope away from the proposed building.
4. A benchmark should be provided on the Site Development Detail plan.

G. Landscape Design

1. We will defer the review and recommendation of landscaping to the Board Planner and Ewing Township Environmental Commission.

H. Lighting

1. **Addressed:** A wall mounted lighting fixture height should be noted on the Lighting Plan.
2. Manufacturer's footcandle isocurve photometrics should be submitted in support of the proposed lighting illumination.

I. Construction Details

1. **Addressed:** The concrete wheel stop detail should be revised to note 4,000 psi concrete.
2. **Addressed:** The sidewalk/concrete pad detail should be revised to note scored contraction joints to be provided at 4' intervals between expansion joints.
3. **Addressed:** The pavement detail should be revised to note NJDOT designation HMA 9.5 M64 for surface course paving and HMA 19M64 for base paving.
4. **Addressed:** The solid waste enclosure detail should be revised to show an expansion joint at the midpoint of the concrete pad. The 18' x 20' dimension conflicts with the 20' x 20' dimension shown on the plans.
5. **Addressed:** A material storage bin detail and a 6' high chain link fence and gate detail should be included on the detail sheet.

J. Architecture

1. Signed and sealed architectural plans should be submitted for review.

K. Miscellaneous

1. **Addressed:** Property Owners within 200 feet of the subject property should be listed on the cover sheet.
2. **Addressed:** The signature approval block should be revised to reflect approval by the Zoning Board.
3. **Addressed:** The plans should be revised to reflect the correct block and lot numbers for properties within 200 feet of the southerly property line of the subject property.
4. **Addressed:** The Eggerts Crossing right-of-way and pavement width should be dimensioned on the plans.
5. **Addressed:** The proposed building overhang should be identified and dimensioned on the plans.
6. **Addressed:** The existing conditions plan should be revised to note the existing material storage bins to be removed.

IV. OUTSIDE AGENCY APPROVALS

This plan may be subject to the review and approval of the following outside agencies, if not already received. Evidence of these approvals must be submitted to the Township Zoning Department and this office prior to the final signature of plans:

1. Mercer County Planning Board
2. Mercer County Soil Conservation District
4. Ewing Lawrence Sewerage Authority
5. Trenton Water Authority
6. Lawrence Township
7. Any other agencies as may be deemed necessary

Should you have any questions or require any additional information, please do not hesitate to contact this office.

Very truly yours,

ALAIMO GROUP



Martin G. Miller, PE, PLS, PP, CME
Senior Project Engineer

MGM/DV

- c: Ewing Township Zoning Board
James McManimon, Business Administrator
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