



December 9, 2022

Mr. Richard Owen
Ewing Township Zoning Board
2 Jake Garzio Drive
Ewing, NJ 08628

**RE: Paul Robeson Charter School
Block 13, Lot 36**

Owner:
JDM Holdings LLC
57 Mace Street
Staten Island, NY 10306

Applicant:
Friends of Paul Robeson Charter School, Inc.
C/O Jeffrey M. Hall
101 Grovers Mill Road, Suite 200
Lawrenceville, NJ 08648

I. Proposal Summary:

The applicant is proposing to develop a vacant 3.14-acre site located at the corners of Princeton Avenue, Pritchard Street, and New Willow Street. The majority of the property (2.59 acres) is located in Ewing Township with the remainder (0.55 acres) in the City of Trenton. Proposed improvements include a new charter school building for 675 students, related amenities and site improvements, parking, bus drop off area, outdoor recreational space, and green area. The applicant is seeking bulk variance relief for impervious coverage and parking. The property is located in Sub-Area 5 of the Olden Avenue Redevelopment Area.

II. Submission

1. Land Development Application submitted 11/18/2022.
2. Rider to Land Development Application.
3. Land Development Checklist.
4. Survey, prepared by Carroll Engineering, dated 9/23/21.
5. Major Site Plan, prepared by Carroll Engineering, dated 11/11/2022.
6. Architectural Plans, prepared by AOS Architects, dated 11/10/2022.
7. Traffic Impact Study, prepared by Stonefield Engineering, dated 10/21/2022.

III. Waivers and Variances

1. Variances
 - a. Lot Coverage, Sub-Area 5, Olden Avenue Redevelopment Plan
 - i. 60% maximum is permitted, where 63.1% is proposed. A variance is required.
 - b. Parking (§215-36(H))
 - i. 115 parking is required, where 75 is proposed. A variance is required.

IV. Planning Review

1. Land Use
 - a. Schools are a permitted use in Sub-Area 5 of the OARP.
 - b. We note that schools are also an inherently beneficial use, which factors into the positive criteria for any of the requested variances the Board is being asked to entertain.
2. Parking
 - a. Per the *§215-36 Off-street Parking Loading and Unloading*:
 - i. Seventy-five (75) parking spaces are proposed (1 per staff member).
 - ii. An additional forty (40) parking spaces (1 per 3 seats) are required for the gymnasium per *§215-36 Off-street Parking Loading and Unloading Ordinance*. A variance is required.
 - iii. Testimony is requested to help demonstrate to the board whether the proposed parking variance will cause any adverse impact on surrounding neighborhoods.
 - iv. Testimony is requested regarding off-street parking for any afterschool events.
 - b. We note that the project meets and exceeds the off-street parking requirements of the City of Trenton zoning code.
 - c. Safe, secure, and convenient sheltered on-site bicycle storage is recommended.
3. Circulation
 - a. We have reviewed the public improvements recommended in the Traffic Impact Study prepared by Stonefield Engineering. We take no exceptions but defer to the Township Engineer.
 - b. ADA curb ramps, sidewalk, and driveway crosswalk or apron at the northernmost corner is recommended on New Willow Street with regard to existing institutional uses and potential redevelopment of neighboring sites.
 - c. We recommend that Ewing Township, the City of Trenton, and the applicant work out the final off-tract pedestrian connection from the site to the existing sidewalk at the Capital City Sports Complex. The off-site sidewalk and crosswalk connection should be clearly delineated.
4. Lot Coverage
 - a. Maximum lot coverage of 60% is permitted, where 63.1% is proposed. A variance is required.
 - i. The proposed school is an inherently beneficial use and a known contaminated site. The applicant asserts that the variance is necessary due to residual contamination that is undergoing environmental remediation.
 - b. We will defer to the Township Engineer to confirm that the proposed site plan meets NJDEP stormwater management rules. However, the proposed underground detention basin system seems to manage stormwater runoff from the project.

V. Architectural Review

1. The proposed plans meet the architectural design standards of the OARP.

VI. Landscaping Review

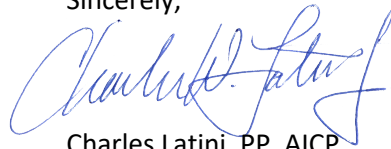
1. The proposed plans meet the Township Landscaping standards and Tree Removal and Replacement ordinance.

VII. Conclusion

The proposed school is a welcome improvement to a long-vacant and contaminated site. Pending additional testimony regarding parking, the proposed is not expected to cause substantial detriment to the public welfare nor impair the zoning ordinance or redevelopment plan. We expect this project to contribute positively to the streetscape and the neighborhoods of Ewing and Trenton.

Should you have any questions or concerns, please feel free to contact me at 212-203-5137 or via email, cwl@latinigleitz.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Charles Latini".

Charles Latini, PP, AICP