



consultants in planning, zoning, economic development,
urban design & landscape architecture

To: City of Trenton
From: Camiros
Date: May 2022
Re: LDO Public Comment

The following report summarizes comments received on the first draft of the Land Development Ordinance (LDO). Staff and the Consultant have included responses to comments where appropriate. Thank you for your review and comment on this important document!

LDO CATEGORY	COMMENT RECEIVED	RESPONSE
Incomplete Comment	15 year Trenton resident	
Incomplete Comment	Yes	
Category	Comment	Response
Corrections	Page 15-6 Spelling: N Brad = N Broad	We will make the correction.
Corrections	The LDO varyingly refers to the Commission as the “Historic Landmarks Commission” and “Landmarks Commission.” For consistency, we recommend that the Commission be referred to by its proper name as established in City ordinance §2-71.B: “Landmarks Commission for Historic Preservation,” which may be shorted to “Landmarks Commission.”	We will make the correction.
Category	Comment	Response
Not Within the Authority of the LDO	Will this ordinance address noise enforcement? I am interested in the use of lawnmowers and leaf blowers in the mornings on the weekends, can this be moved to after 9:30am and then the ATVs that roam up and down the streets, especially on Sundays. You can not keep your windows open because of the noise from those machines. Almost every week there are major disturbances in the neighborhood to point that we kept our windows closed all summer. I know they are illegal but it appears the police have given up on them for more serious crimes, but when Sunday is your only day off you cant sleep, watch a movie or even have a conversation.	The noise ordinance and enforcement of noise violations are outside of the LDO.
Not Within the Authority of the LDO	Huge issue throughout the city are contractors parking their the work vans in residential areas. Should not be permitted although the license plates isn't tagged “commercial.” It appears the contractors learned about the code re not allowed to park in city limits if the tags are “commercial.”	Please note, if this is related to parking on the street, this is not part of LDO standards. However, passenger-sized commercial vehicles can be parked on private property.
Not Within the Authority of the LDO	The City could look at creating more municipal parking lots in high demand areas that can be shared by residents and businesses. Conover’s Alley between S. Broad and the 100 block of Jackson Street is a good example.	This is a parking strategy that is outside of the authority of the LDO.
Not Within the Authority of the LDO	Alternate side of the street parking for street cleaning could be better coordinated to maximize on-street parking at critical times of the day. For instance, shifting street sweeping in Mill Hill from 8-10am to 10am-12pm, would allow people to not have to scramble to move their cars in the morning.	This is a parking strategy that is outside of the authority of the LDO.
Not Within the Authority of the LDO	Neighborhood parking permit programs need to be kept current and enforced. It also will need to be clear who is eligible for these permits, i.e., if new projects are required to have on-site parking, then those residents should not be eligible for neighborhood on-street parking permits.	This is a parking strategy that is outside of the authority of the LDO.
Not Within the Authority of the LDO	State workers should be charged for parking, which would create a disincentive for the large number of single-occupancy car trips in and out of the city and reduce parking demand, which would free up capacity.	This is a parking strategy that is outside of the authority of the LDO.

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Not Within the Authority of the LDO	If the city can't control neighboring businesses from the commendeering of the private parking of businesses who have complied in the past with existing parking ordinances from strong arm aggressive actions, then any adjustments to what happens here in our city in true reality is simply not gonna promote a receptive city to invest, work or plans to avoid gentrification activity because there is a cancer in our communities that is and has been turning investors away at first glance.	This is a parking strategy that is outside of the authority of the LDO.
Not Within the Authority of the LDO	Much of Trenton is characterized by alleyways---this was never considered a zoning characteristic, and the LDO team insisted that land development didn't include right-of-ways. I believe Villa Park has over 1000 single family homes built in the first third of the 20th century for one-car families. Half of these have alley access, and the majority are duplexes. Approx 30% of these are rentals with two or more families in them, having 2 cars a piece. Alley access is more and more being used for parking. Our current ordinance requires any parking in backyards to be paved... permeable surfaces are illegal. Alleyway "frontage" (that is, making our back doors into our "front doors") and creating alleyway neighbors with those we share these "frontages" and our backyard grills and parties with is EXTREMELY IMPORTANT TO THE DEVELOPMENT OF HEALTHY SAFE NEIGHBORHOODS. Alleys which have been where muggings and break-in surveillance always used to occur are where people walk to the store, children ride their bikes and walk their dogs. They can be where our old-time neighborly relations come about--- To ignore such a resource in a "land development ordinance" (so-called) is like saying people's ears don't count for "facial characteristics" because they're not on the front or may be covered by hair.	The scope of the LDO does not address right-of-way design; the LDO controls what happens on private property.
Not Within the Authority of the LDO	NJF supports the LDO's commitment to creating green space and anticipates that Trenton's Stormwater Control Ordinance will reflect this commitment when it is published. NJF asks Trenton to update its Stormwater Control Ordinance to require green infrastructure on new major development projects, as required by the Stormwater Rules. NJF hopes that Trenton will consider going above and beyond NJDEP's minimum requirements by requiring green infrastructure on redevelopment sites. Please see the Green Infrastructure Municipal Toolkit for more information: https://gitoolkit.njfuture.org/plan/	We agree with the importance of this, and an update of the Stormwater Ordinance is a separate project that is underway.
Category	Comment	Response
Relationship to Redevelopment Area Plans	Transit District with Landmarks. Within this 1/2 mile radius, there are four Landmarks districts and several redevelopment plan areas – all in conflict with each other and the new LDO – how will the new proposals reconcile with this issue?	Redevelopment plans continue to control; there is no intention to remove any landmarks designation.
Category	Comment	Response
General Statement	Waiting for info / meetings. Keep me updated.	
General Statement	Is there anything in the Plan to reopen the neighborhood libraries or turn DownTown Library into a 21st Central Library? If not, what are we doing?	
General Statement	Hi, I am concerned with the zoning of my property 208 Sanhican Drive	We ask that you review the Zoning Map to let us know your concern.
General Statement	Is there a listing of the changes from the current ordinance to the new ordinance? I know that there is the 4-page summary that lists some of the changes, but it is difficult to review the 236-page ordinance without some additional guidance on the changes.	Because of the significant changes and the new organization, a comparison is not feasible.
General Statement	I would like more information about the project.	
General Statement	Why does this form have questions about race or language? This is a redevelopment plan, why would anybody care about the race of creed of anyone commenting on or Involved in this project? Things like this are why trenton is the way it is currently. This city should be a great city, located between Philadelphia and New York with train and highway access to both, but it's not... and that is due to the rampant corruption that pervades every inch of the city and the ridiculous decision making like asking about race on this form....	

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General Statement	I want to see space made available for the youth in my community we need a skating rink and a movie theater in the city. I love to see electric car stations and green space for the city but does that incorporate a flourishing downtown like other cities with more stores and places to eat. I'm excited and thankful that we at this stage of panning and hopes this doesn't take 20 years to come to pass. Thank you	
General Statement	Once again, more studies making big money for insiders, while Trenton gets worse and worse. Put a stop to the concentration of poverty in Trenton, make the suburbs shoulder their fair share of social services. Until that happens, Trenton will continue its collapse. Everything else is frivolous and a waste of time and money.	
General Statement	Hello, I am a resident in Lawrence Township New Jersey. My brother lives in Trenton and is on the Planning Board. I am a Graduate student at Rutgers University and have been researching the Assunpink Greenway and the Capital City Landscape Revitalization. I wish Lawrence Township would engage the community the way that Trenton does and that we could have the two work together to connect our open spaces. I am also on the Enviro Committee here in Lawrence and know there are a lot of great opportunities. Thank you for all your work for the communities. Happy New Year!	
General Statement	NJF supports the LDO's emphasis on sustainability, especially with regard to green infrastructure, bicycles, and public transit.	
General Statement	<p>Trenton has a large immigrant community. Many of which are undocumented. When thinking about developments and transportation please keep in mind families that are unable to have things under their name in fear of deportation.</p> <p>Parking should not become harder and building should be done so in conjunction with cautionary measures for renting families. Rent is rapidly rising and people who are low income and vulnerable are struggling to keep up.</p> <p>Do not mindlessly build and think about the potential of Trenton without considering how your efforts to make a more fruitful community could in fact harm those who are already there and just continue to push our most vulnerable families out. Be an advocate for a developing Trenton, but be a bigger advocate for our most vulnerable families.</p>	
General Statement	NJF appreciates that the LDO references the Developers Green Infrastructure Guide and hopes that this reference encourages developers to use green infrastructure in their designs.	
Category	Comment	Response
LDO District Standards	New single dwellings that are being built would like for the new structure to fit (design) within the neighborhood even if the neighborhood isn't historic	Dimensional standards and design standards tailored to the character of Trenton help to ensure contextual development.
LDO District Standards	(Re; S. Clinton) There are also historic buildings in the area. I'd love to see the restoration of these rather than knocking them down. Trenton is a beautiful city and it would be a shame to erase it.	New standards within the districts should make the ability to restore/reuse structures much easier.
LDO District Standards	I find that adding density has been a challenge in Trenton. I can attest to this as the zoning where I had a 4 family that burnt down is zoned R B. In order to build what was previously there I would need a variance and encourage density. New zoning should include that a former use is allowed without going through a variance . Princeton zoning is considering ADU's to allowing for garage conversions, basement apartments, and tiny houses in backyards. Due to the tight housing Trenton should incorporate this idea into the new zoning.	<p>We have expanded the types of dwelling units allowed within the districts and have revised the Zoning Map to align with existing land use and Trenton250. This will help to minimize nonconformities and allow more housing diversity.</p> <p>The current draft also has allowances for ADUs and standards for residential conversions. In the current draft, ADUs are allowed on lots of 5,000sqft in area; at this time, we will lower the requirement to</p>

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		4,000sqft to match the RL-3 District minimum lot area standard.
LDO District Standards	4-1 RH-2 High Density Residential District states that this district will have the “highest allowed densities within Trenton. It is designed to reflect the development pattern existing in many of Trenton’s historic neighborhoods.....” This reference should be corrected as many of the historic neighborhoods of Trenton are not developed to the highest levels.	We will clarify the language.
LDO District Standards	5-1 DT Downtown Trenton District states that this district “is intended to accommodate the most intense development within the City....” While I agree this district should allow intense development, the TOD-2 district should also be where the most intense development in the City is allowed to occur.	The standards for these districts reflect the plans created for these areas.
LDO District Standards	8-9 4. Building Material Restrictions b. iv. – Restricts vinyl siding to no more than 25% of the building’s façade. While not optimal, higher-quality, vinyl siding can be a lower-cost alternative and should be acceptable up to 100% of the façade in non-historic sections of the City.	We believe that the prohibition is appropriate. The standard is only applicable to multi-family and rowhouse developments.
Category	Comment	Response
LDO General Development Standards: Public Art	<p>Artworks' new Public Projects Manager Jonathan "LANK" Conner (also a city resident) and I have read the draft LDO for Trenton, and we noticed that there are no references to or guidelines for installation of public art in the city.</p> <p>Public art has its own unique attributes, and while it may intersect with urban features like signage, wayfinding, and street furniture (bike racks, benches etc.), it requires very different guidelines for installation (and deinstallation). The current draft LDO presents an opportunity for Trenton to develop some basic guidelines for public art.</p> <p>We would be happy to meet and have a conversation about this. As you know, at Artworks we are big fans of public art, and the community health and civic benefits it brings to urban neighborhoods. Artworks would like to see a lot more new public art within Trenton in the future, and perhaps now is the time to begin to develop some guidelines for it.</p>	<p>Guidelines for public art would not be included within the LDO. Because the LDO deals with private property, public art on the ROW ("signage, wayfinding, and street furniture") would not be controlled by the LDO.</p> <p>The LDO references public art only in regard to a qualifying action for required open space: "Permanent outdoor public art installation with sufficient area set aside for public viewing. (Exhibitions may be changed within the installation area.)" Public art is also allowed as an option to screen a parking structure. Both of these are for public art on private property.</p>
LDO General Development Standards: Permitted Encroachments	<p>I listened in on your presentation to the Trenton Downtown Association and found it to be rather informative. As a downtown property owner I've talked with other property owners over the years and one of the issues they've mentioned with some of their buildings are the lack of fire escapes and the inability to install them. I'm not sure if this is part of your project, and if it is, if it's been addressed.</p> <p>The main reason this is an issue is because many of the building's upper floors, which could become living space or office space, have to remain empty due to no fire escape. While I personally haven't researched this and am relying on their word, it's been said that fire escapes can't be installed on the front of buildings. That becomes an issue for some of the buildings due to nowhere else to put it.</p> <p>Downtown is in dire need of help. Getting the vacant buildings occupied could be the beginning of something good. I can understand why very few would want to buy a three story building when only the first floor can be used and the other floors have to remain uninhabitable.</p> <p>I hope this is within your domain and that it's being addressed and a workable solution is available.</p>	<p>We will look at encroachments into the right-of-way to allow fire escapes (and other building elements like steps) for buildings built at the lot line. We will also discuss this comment with the Landmarks Commission.</p> <p><i>** This comment is also related to Historic District standards (see below).</i></p>
LDO General Development Standards: Green Space Requirements	Please accept this letter as The Watershed Institute's formal comments for the Draft Land Development Ordinance for the City of Trenton. The Watershed Institute (TWI) is a non-profit organization established in 1949 to protect and restore the Stony Brook, Millstone River, their associated watersheds, tributaries, and habitats. This area includes 265 square miles,	We are continuing to review this standard in its entirety.

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	<p>draining approximately one-third of the Raritan Basin in central parts of New Jersey.</p> <p>TWI recommends that the Draft Land Development Ordinance should prioritize the generation or conservation of green spaces within the city limits that can address issues related to stormwater flooding.</p> <p>The plan currently outlines the requirement for multifamily, mixed-use and non-residential developments to provide green or civic space for residents. The plan dictates that multi-family developments must provide at least 100 square feet of on-site green space and/or civic space per dwelling unit with a minimum of 30% of required on-site space must be common green space. The fact that spaces like decks, balconies, porches and roofs can qualify as green space (as outlined in Table 9-1) is concerning because those spaces will do little to nothing to improve the stormwater flooding issues that plague Trenton regularly. Additionally, the plan regularly presents civic space and green space as equal options for developers, however the water infiltration ability of these different options would have drastically different impacts on local flooding depending on the material used (impervious vs pervious surfaces).</p> <p>The plan also dictates that green space for multi-family development provide at least 100 square feet of on-site green or civic space per dwelling. As local flooding is a function of land use change and not necessarily population, we encourage the City of Trenton to modify this requirement to reflect the amount of green space created as a function of land disturbed by the project to compensate for the significant flooding currently experienced in Trenton.</p>	
<p>LDO General Development Standards: Green Space Requirements</p>	<p>9-2 B. Minimum On-Site Green Space and Civic Space 1. – while desirable, providing 100 Sq. Ft. of on-site green space and/or civic space per dwelling unit is excessive especially in an urban area. Applying this factor to a hypothetical 150-unit (which isn't excessively large) development would require 15,000 Sq. Ft. of space or 1/3 of an acre. Development sites adjacent to existing public open space should also be allowed to offset this requirement – without a significant cost - to encourage increased utilization of the public space. To be competitive, developers will incorporate amenities such as gyms, meeting rooms, and recreation areas into their projects and should not be forced to meet excessive standards which may reduce the amount of housing and other development occurring in Trenton. I suggest significantly reducing or eliminating this requirement as it is not conducive to development particularly in developed, urban areas and will limit new housing and other new opportunities.</p>	<p>We are continuing to review this standard in its entirety.</p>
<p>LDO General Development Standards: Green Space Requirements</p>	<p>Green/Civic Space requirement – Mixed Use – 100SF/Unit. (Copy of P26 of Trenton-LDO on left side). There are locations in the zoning where a 120' height limit is allowed that implies 10 stories or 150+ units. This would require 15,000SF of open space. That's over 1/4 of an acre. In many cases, that's almost the entire footprint of the site – nor would that example be seen in such a dense and closely located city like Trenton – it's not seen in NYC, Philadelphia, Jersey City, Harrison, New Brunswick. This is not possible.</p>	<p>We are continuing to review this standard in its entirety.</p>
<p>LDO General Development Standards: Green Space Requirements</p>	<p>Green/Civic Space requirement. Planning Board can approve fee in-lieu of – but this just drives up costs in Trenton where high-rise construction isn't even feasible.</p>	<p>We are continuing to review this standard in its entirety. This is an option to provide more flexibility.</p>
<p>LDO General Development Standards: Landscape</p>	<p>In regards to requirements outlined in Article 11. Landscape, justification for not utilizing native plants in landscaping should be a requirement. Additionally, landscaping requirements for parking lot adjacent areas should aggressively address stormwater runoff through green infrastructure. Road and parking lot runoff represents a large portion of stormwater flooding so by requiring aggressive treatment along parking lots, Trenton can preemptively</p>	<p>We will review this standard to see the feasible of requiring native plantings.</p>

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	<p>address local flooding issues.</p> <p>The Watershed Institute would like to applaud the City of Trenton for prioritizing tree protection as well as setting requirements for tree diversity. Including information on the energy saving potential of properly placed trees is a valuable inclusion in the plan. It is clear Trenton has a better understanding than the average city of the value and impact of trees on flooding, urban heat island effect and human health.</p>	
LDO General Development Standards: Landscape	11-3 Building Foundation Landscape 2. a. and b. should exclude linear feet used for building egress	We will make this clarification.
LDO General Development Standards: Landscape	11-4 Required Parking Lot Landscaping Abutting a Street – while desirable in concept, incorporating landscaping into heavily paved areas 1) often results in extremely difficult conditions for the landscaped elements; and 2) will significantly decrease parking lot efficiency. As a result, I recommend this requirement be eliminated especially in a land-constrained urban area. Although not suggested in the LDO, incorporating an irrigation system into parking areas is very cost prohibitive and should also not be considered as an option.	Parking lot landscape is a common ordinance provision and in addition to screening of parking lots, it offers benefits such as stormwater control and minimizing the heat island effect. We do not require irrigation and do not want to prohibit its use if needed by the development.
LDO General Development Standards: Landscape	11-9 11.10 TREE CONSERVATION E. Permitted Tree Removal 3. – should include irreparable damage to sidewalks as a condition for removal	We will add the standard.
LDO General Development Standards: Signs	12-7 H. Light Pole Banner 1. – Light pole banners should be permitted as off-premises signage in conditions when the light poles define a particular district (e.g., college or university district, specific historic district, etc.)	These banners are within private parking lots and content neutrality is required. Exceptions cannot be made for off-premise signs as related above.
LDO General Development Standards: Signs	12-21 K. Wall Sign 1. Standard Wall Sign c. – provides that a wall sign can be no larger than 40 SQ. Ft. This seems very minimal especially if the sign would be part of a larger building. Rooftop signs may not be as desirable in some uses and a façade sign should be allowed to be larger than 40 Sq. Ft.	This is interpreted incorrectly. 40sf is the base minimum allowed to all wall signs.
Category	Comment	Response
Uses	<p>There is chronic abuse to the zoning approvals afforded in the past to current uses. Church designation is used to circumvent true values of a building for property tax assessed values and allow those portions of buildings to be used "off the record" to host underground events that make lots of cash in a "free use" structures and...</p> <p>These illegally labeled structures cause untold parking complications as a result of excessive occupation for structures adjacent or nearby who do have ample parking for "their customers".</p> <p>Problem in Trenton is that illegally misrepresented structures appear to have "carte blanc" permission to exist because these buildings never get reviewed or appear to never be required to license "old zoning approval" that are on record and operate on grandfathered permissions, that were in fact fronts for underground establishment operations.</p> <p>So the neighborhood gets unwanted reputations, the city loses out on tax revenue from all angles, parking appears to always be congested and the territorial protection intensity increases to the demise and fear factor that turns the community into a hub of vice and fear for out of community interaction.</p>	Places of worship are afforded federal protections so the ability to place restrictions on these uses are severely limited. In terms of uses operating illegally, this is an enforcement issue.
Uses	Section 84 Item N - Page. 90 – Industrial Artisan uses – states this use is limited to 10,000 SF. In practice this restriction will be problematic. A property owner interested in this use is likely to take advantage of one of Trenton's existing older buildings. They would be expected to seek to convert the entire structure for this use. If there is an arbitrary limit set	We will remove the size limitation.

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	<p>without regard to the size of an actual existing buildings, this unnecessary overall limitation on the size of the use, is likely to discourage this use entirely.</p> <p>I can envision a multi-tenanted property such as 21 Muirhead, which has 30,000 SF overall plus a useable basement and attic, making the building area over 40,000 SF. The building's multiple floors and sections could be readily divided for multiple tenants. The owner may have difficulty finding other tenants with complementary uses that are not classified as artisan uses, and so risks not being able to fully lease the building. I can think of several other buildings that this would affect. This restriction seems arbitrary and not related to the existing building inventory.</p>	
Uses	<p>Hi there...thanks for your work on this! There are some inconsistencies between proposed LDO and recent Community Gardening Ordinance. LDO language is preferable. (Have already shared this with Planning Staff)</p> <p>See Email/PDF</p>	<p>We will need to reconcile the issues between the community gardening requirements. We will update apiary standards (sent in separate email) to reflect the changes requested.</p>
Uses	<p>8-2 8.3 USE RESTRICTIONS B - States that drive through facilities are prohibited except for financial institutions while the definition of a Drive-Through Facility (page 2-8) states that it must be approved separately as a principal use "such as eating and drinking establishments". While not desirable in all locations, the LDO should permit drive through facilities for eating and (non- alcoholic) drinking establishments.</p>	<p>The proposed draft prohibits drive-throughs, with the exception of financial institutions. We will correct the definition as that language is an error.</p>
Category	Comment	Response
Affordable Housing	<p>I would like to know if/how the required ratio of affordable housing to market rate housing in new development will be addressed by this ordinance, and if not by this ordinance, than by what measures it will be addressed. I am concerned about the future affordability and potential displacement of residents in certain areas, specifically around in East Trenton and Wilbur Section. With Wilbur Section in particular, with the impending development of the Trenton Transit Center area, I anticipate that if this is not addressed, many of the current residents of that area (most of whom are renters) will be priced out of the area. To my knowledge there is no current affordable housing development taking place in that area and currently the area has little to no permanent affordable housing options, while other parts of the city, like MLK/Brunswick Ave area and parts of West Trenton have a high concentration of affordable housing. Without responsible integration of mixed affordable and market rate housing, we will end up with even more concentrated pockets of poverty in the city, and/or displace massive amounts of our low income residents.</p>	<p>Thank you for your comment. The LDO, as drafted, does not address a ratio of affordable housing to market rate housing in new development. Such a provision would be considered "inclusionary zoning," and as such has not been included in the LDO for a several reasons:</p> <p>The City's Comprehensive Plan, Trenton250, while speaking of the City's commitment to affordable housing, does not recommend the adoption of inclusionary zoning as a mechanism to produce such housing. In fact, Trenton250 states that the City has an "excessive amount of deed-restricted affordable housing as a proportion of total housing stock and regional 'fair share.'" According to the plan, 24% of the City's housing stock is deed-restricted affordable housing dedicated to households with incomes at or below 80% AMI (area median income). It further states that the most urgent need is housing for those families earning 30% or lower AMI – which would typically not be addressed through inclusionary zoning – and suggests that new market-rate housing can appeal to residents of "relatively modest income levels, relieving the City of this burden." In response to this guidance, the Draft LDO has been written to provide for a greater range of residential districts, and to allow a greater diversity of housing types, which can encourage the creation of new units at a variety of price points.</p>

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		Should the City's policy shift toward the use of inclusionary zoning as a mechanism to produce affordable housing units, such a mechanism would need to be informed by specific study to ensure that any provisions included would correspond to market realities, community desires, and achievable outcomes. Such study is beyond the scope of the current LDO update process. Inclusionary zoning can be used to produce affordable housing, but the requirements must be specifically tailored to local conditions to ensure that they serve to produce more affordable units within the City, and not to suppress production of new units through imposition of market-incompatible regulations.
Category	Comment	Response
Parking: Elimination of Minimums	The number one concern of businesses in Trenton is the lack of parking. The argument that "the market will decide" how much parking developers will provide is naïve. Developers will likely provide too little parking which will overburden existing curbside parking.	
Parking: Elimination of Minimums	Parking minimums stall development. The city should strive to eliminate minimum parking requirements and encourage more use of public parking facilities which should offer weekend and evening rates, residential rates and flexible rates whenever possible.	
Parking: Elimination of Minimums	I fully support the change from minimum parking requirements to Max parking requirements and strongly support EV charging and bicycle parking requirements. I am strongly in favor of the need to reduce paving and increase permeable surfaces.	
Parking: Elimination of Minimums	NJF supports the LDO's emphasis on reducing the amount of space that is dedicated to parking. From a stormwater management perspective, we would like to see parking lots redeveloped and infiltrating stormwater runoff, whether as a park or other use.	
Parking: TDM	I support the general direction that the City is moving in regarding parking, but I am concerned that there are not adequate safeguards to protect existing owners and on-street neighborhood parking facilities. The requirement for a Transportation Demand Management Plan created by the developer's consultant is not comforting and is not applied to smaller scale projects that may have a significant parking impact, i.e., adding five-units of housing to a crowded street can be chaotic. A key factor triggering the creation of a TDM Plan should not just be size of project, but location of project and how difficult parking is in those areas.	We are continuing to review this standard.
Parking: TDM	<p>10.5 Transportation Demand Management</p> <p>This entire concept is extremely problematic without any guidelines. One cannot plan for or create a development concept in the absence of knowing what the parking requirements are or will be.</p> <p>First, the new parking restrictions require all parking on-site – eliminating the possibility of leveraging nearby parking lots. Then when a development team is trying to figure out the site design – how do they do it without knowing the parking requirements? They will have to guess what the ultimate Transportation Demand consultant will determine.</p> <p>Then they will come up with a scheme for the site – and spend significant sums to create a site plan and architectural design – hoping all the way that their scheme for parking will be substantiated by the consultant.</p> <p>Assuming that happens, then they roll the dice that the planning or zoning</p>	We are continuing to review this standard. We will be adding more standards to the TDM provisions, which will allow more objective review and assessment.

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	<p>board will agree with the Transportation demand report that was submitted. Few if any of the board members are parking experts, so they may have their own subjective views and send the plan back.</p> <p>Then what – does the development team go back the drawing board and hope to come up with another version that may or may not be acceptable to the board?</p> <p>This is fraught with problems – and could potentially defray interest in developing sites.</p>	
Parking: TDM	<p>10.5 Transportation Demand Management. This entire concept is extremely problematic without any guidelines. One cannot plan for or create a development concept in the absence of knowing what the parking requirements are or will be. First, the new parking restrictions require all residential parking to be located on-site – eliminating the possibility of leveraging nearby parking lots. Even non-residential parking in non-residential districts must be located no more than 1,000' from the project. This eliminates creative solutions to utilize more distant parking and utilization of a shuttle service, etc. without a variance. The parking location limitations also make it much more difficult for a development team trying to figure out the site design – how do they do it without knowing the parking requirements? They will have to guess what the ultimate Transportation Demand consultant will determine. Then they will come up with a scheme for the site – and spend significant sums to create a site plan and architectural design – hoping all the way that their scheme for parking will be substantiated by the consultant. Assuming that happens, then they roll the dice that the planning or zoning board will agree with the Transportation demand report that was submitted. Few if any of the board members are parking experts, so they may have their own subjective views and send the plan back. Then what – does the development team go back the drawing board and hope to come up with another version that may or may not be acceptable to the board? This is fraught with problems – and could potentially defray interest in developing sites.</p>	<p>We are continuing to review this standard. We will be adding more standards to the TDM provisions, which will allow more objective review and assessment.</p>
Parking: Parking Structures	<p>Parking structures as a principal use should not be allowed and should require a variance. Garages have a major and lasting impact on the areas where they are located and need to be handled as unique and critical developments. The only as-of-right structures should be as you have outlined in Parking Structures as Ancillary to a Principal Use section.</p>	<p>We believe there is still a need for parking structures in select districts; however due to the cost of constructing parking structures we do not believe that this will lead to an excess of these uses. We continue to look at design standards for parking structures as well.</p>
Parking: Parking Location + Design	<p>10.2 A. 1. Residential uses. All required parking spaces for residential uses must be located on the same lot as the residential use.</p> <p>10.2 B. 1. Non-residential uses. All required parking spaces for non-residential uses in residential districts must be located on the same lot as the use served.</p> <p>3. Parking spaces for commercial and mixed-use districts (TOD) must be located to the side or rear of the principal building.</p> <p>All of the above requirements will preclude the opportunity to leverage the empty parking spaces on weekends & evenings in the Transit Center and Downtown neighborhoods. These areas have significant excess parking capacity that can be used to increase development – but all of these opportunities will be prohibited with the new LDO parking restrictions. In many successful cities, parking is frequently sourced offsite – given Trenton's small footprint and excess parking structure and lot capacity – why limit our growth potential and drive up costs by forcing more parking on-site?</p>	<p>In the current draft, the provisions of 10.2 apply when the development chooses to install parking.</p> <p>10.2.B.1 refers only to nonresidential uses only in residential districts. For nonresidential uses in nonresidential districts a 1,000' distance from the site is allowed.</p> <p>Further, when a TDM is required, options such as the one outlined for "empty parking spaces" located nearby, without a distance requirement, can be utilized.</p>
Parking: Parking Location + Design	<p>10.3 Standards for off-street Parking</p> <p>From chart: 90 degree (Head In Parking) – required aisle width – 25'. The current requirement is 24' which should stay – most parking modules –</p>	<p>Will be corrected to the current standard of 24'.</p>

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	<p>and all structured parking standards as a 60' parking module with 18' stall, 24' wide drive and 18' stall = 60'</p> <p>This extra foot width will limit the potential for high-density developments with structured parking.</p>	
Parking: Parking Location + Design	<p>H. Parking structure design b. Integrated Ancillary Parking Structures i. Parking structures must include residential or non-residential active uses along 75% of the ground floor length....</p> <p>This is too onerous: First, the uses will likely not be residential in a tall building with a ground floor parking structure, so that leaves retail/office as the uses, and then only 25% for parking access with little natural ventilation. This will trigger major air circulation systems for fresh air requirements – you don't even see this in major cities that could afford that? Look to Philadelphia, Long Island City, Brooklyn Hoboken – this requirement isn't practical.</p> <p>ii. Non-residential active use spaces must be a min. of 20 ft.and the ability to accommodate equipment for restaurant uses. Why is this needed? Any building that will have structured parking will be a large building – with multiple retail/office spaces. Why should a building be able to accommodate 2-3-4-5 restaurants - This will create tremendous problems for high-rise buildings in ventilation shaft ways for exhaust. Not all retail spaces are leased to restaurant uses – and currently there is little to no demand for new restaurants so why be incredibly onerous now?</p>	<p>Please note, the 75% calculation for active uses is based on the linear frontage once "areas of required vehicular and pedestrian egress, and mechanical or electrical equipment rooms" have been excluded.</p> <p>We will remove the requirement for spaces to accommodate a restaurant use.</p>
Parking: Required Spaces	<p>10-12 Maximum Vehicle Spaces relating to Domestic Violence and Homeless Shelters should relate to the number of rooms provided rather than GFA of office space. While occupants of these facilities in many cases may not have access to vehicles, tying vehicles to office space seems less relatable than to the number of potential occupants.</p>	<p>This is a fairly common parking standard for these uses as the primary users of parking are the employees.</p>
Parking: EV Spaces	<p>As to the electric parking charger stations, 1. Who pays for the installation. 2. Will the property owner be allowed to charge fees for the hookup? 3. How extensive & practical is the permissions gonna be to allow property owners to become "electric charging sites" for a fee to the public? 4. Will the electric charger parking stalls be mandatory or optional considering the logistics of setting up the potentially "tariff controlled" public energy supply station.</p>	<p>The LDO does not control the ownership or operation of an EV charging station; rather, it creates permissions to allow them.</p> <p>In terms of mandatory or optional, certain types of parking facilities are required to install EV spaces per the State of NJ; the LDO will be updated to reflect the State Model Ordinance.</p>
Parking: EV Spaces	<p>in High Density residential areas where residents parking is primarily on street we need a solution for EV charging for existing housing. EVs are only a viable solution if you can charge at home or very close to home. For those without private off-street parking this is a challenge. We have an EV and manage with a level 2 charger in the basement with a 25ft cable that reaches a parking spot directly in front of our house. However we need to just hope that no-one else parks there so it is available for us to charge. This isn't a viable long-term solution. In addition many residents in apartments or rental accommodation don't have the option to install a charger that reaches the street. Mandatory EV charging spots on every block would be a solution, another may be to have reserved parking for residents who have installed their own charger.</p>	<p>The requirements for EV spaces will be revised to reflect the NJ State requirements. The required number of spaces and types of spaces specifically cannot be altered within the model code per the State.</p>
Parking: Bicycle Parking	<p>10.4 Off-street vehicle and bicycle parking spaces. D. Required bicycle parking spaces</p> <p>> in the chart – a Multifamily dwelling requires 1 bike space per 2 dwelling units. A 200 unit building would require 100 bike spaces – this is simply ridiculous.</p>	<p>In the required bike parking calculation section, there is a maximum threshold: "In all cases where bicycle parking is required, a minimum of two bicycle spaces and no more than a total of 25 required bicycle parking spaces are required."</p>

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	E. Required EV Charging Vehicle Spaces > again, in the chart – a 200 unit building with 200 spaces would require 40 Capable spaces. This drives up the cost, isn't practical in 2022 and will be excess capacity.	The requirements for EV spaces will be revised to reflect the NJ State requirements. The required number of spaces and types of spaces specifically cannot be altered within the model code per the State.
Parking: Loading	10.8 Off street loading spaces There is no provision here for existing buildings that are essentially lot-line buildings – many of these exist downtown. There are large buildings the could be redeveloped that simply don't have capacity for off-street loading spaces	We will add an exemption from loading requirements for existing buildings.
Category	Comment	Response
Definitions	8.3: Do we need more definitions to define "junkyard" versus "recycling facility". I think we should to clarify what is and is not allowed. Example: Alpha Metals can't expand their metal "recycling" facility because it may be a junkyard. They can build a new facility that recycles platinum and palladium from catalytic converters because it is recycling ??? Also: we get calls from people wanting to "recycle" building materials and stuff, but it sounds like a "junkyard" to me.	We will look at definitions to ensure they are clear. Please advise if you have specific changes that would make this clearer.
Definitions	2-4 Bike Share definition - "membership-based" should be excluded from the definition as not all bike sharing services require membership.	We will make the change.
Definitions	2-16 Mixed-Use definition – a mixed-use structure may not necessarily contain a residential component and the definition should simply reference multiple uses.	As defined in the LDO, and the way it is used to regulate development within the Ordinance, the current definition is accurate. This also reflects the way it is discussed in Trenton250.
Definitions	2-29 Building Height states that building appurtenances such as chimneys and parapet walls are exempt from maximum building heights. However, the diagram on page 2-30 shows the height measured to the highest point including appurtenances. This should be corrected/conformed.	We will revise the diagram to be more clear.
Category	Comment	Response
Historic Districts	Section 15.1.A begins "No person may..." The definitions section of the ordinance indicates that "may" and "can" are permissive; whereas, "must," "shall," and "will" are mandatory. Therefore, the Commission requests that the mandatory language be used here (i.e., "No person shall/will"), and that the entire Article be reviewed to ensure that the appropriate language is used throughout.	We will review the text to see where "shall/must" are more appropriate in place of "may."
Historic Districts	Section 15.1.B addresses emergency repairs. The NJ Historic Preservation Office (NJHPO) has advised the Commission that "emergency" should be defined in the ordinance. Therefore, we offer the following recommended amended text, which is based on model ordinances provided by the NJHPO: Review by the Commission is not required when a historic landmark requires immediate emergency repair to preserve the continued habitability of the landmark and/or the health and safety of its occupants or others. Emergency repairs may be performed in accordance with City codes, without the necessity of first obtaining the Commission's review. Under such circumstances, the repairs performed shall only be such that are necessary to maintain the habitability of the structure. A request for the Commission's review shall be made as soon as possible and no additional work shall be performed upon the structure until an appropriate request for approval is made and obtained in accordance with the procedures set forth in this chapter. All work done under this section shall conform to the criteria set forth in [section] and the guidelines for review of applications as adopted by the planning board in accordance with [section].	We will add the text.
Historic Districts	Section 15.1.D and 15.1.E are essentially redundant. Please omit section D in favor of E, which contains the full text of the existing ordinance.	We will remove item D.
Historic Districts	Section 15.6.B, Emergency Demolition, is a new provision that is not included in the existing ordinance. The Landmarks Commission has concerns regarding this change to the Commission's ability to review and comment on demolitions. Further, we note that model ordinances provided	Current police powers of the City allow for emergency demolition where there is danger of imminent collapse or is an immediate danger. We have added that a report must be

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	to the Commission by the NJ Historic Preservation Office do not contain this type of provision. It is our opinion that the existing provisions for emergency undertakings are sufficient to deal with this type of situation.	filed with the Commission to document why such action has been taken. We will further review this comment.
Historic Districts	<p>Section 15.8, Designated Landmarks and Historic Sites, contains incomplete information regarding the National Register status of a number of properties. For example, the Delaware & Raritan Canal (and its associated canal houses) are listed on the National Register, as is Cadwalader Park and the Mill Hill, State Street, and Berkeley Square Historic Districts; likely there are others. If the National Register designations are to be included, then the list should be complete. The NJHPO has a list on its website: https://www.nj.gov/dep/hpo/1identify/nrsr_lists.htm</p> <p>Additionally, given the length of the list, we recommend providing some form of organization to the list. For example, we recommend grouping the historic districts together under a subheading, as they represent the largest number of regulated properties, followed by the list of individual sites. It would also be helpful if the individual sites were grouped by Ward, and/or if the information were alphabetized and provided in a table format, where one could more easily scan the names and addresses.</p>	We will add the appropriate properties and alphabetize the list.
Historic Districts	There is a missed opportunity here to ease the conflict that exists between the Landmarks Committee and new development applications. The Planning Board has the authority to grant approvals, but the Landmarks "Restoration Permit" presents a challenge as an overlay to the Planning Boards authority. There is no "restoration" when performing demolition and the connection between the two bodies is problematic - especially given that Landmarks is only an advisory body, not regulatory, but they have powers to refuse permits or create issues that prevent progress. This is a recognized issue - and - now that this new LDO appears to create new capacity or "up-zoning" possibilities, the Landmarks overlay will impede progress.	The LDO does not grant or take away powers from the Landmarks Commission - that is regulated elsewhere in the City Code. The LDO only effects the review of private property as it relates to site development and municipal land use law.
Historic Districts	we live in a historic district and have rooftop solar. We got the Landmarks permit because our panels aren't visible. It is vital that rooftop solar is permitted in historic buildings/ districts even if it is visible from the street. It's not clear to me whether this is already covered in the LDO as the wording was a little unclear to me.	Review of solar installations, whether visible or not from the right-of-way, are currently reviewed by the Landmarks Commission, and we have not changed this provision.
Historic Districts	15-1 15.1 RESTORATION PERMIT A. - restricts painting without Landmarks Commission approval. Painting existing, painted surfaces in a color similar to the existing color should be exempt to eliminate the time and expense of the property owner and not burden the Landmarks Commission.	The LDO does not grant or take away powers from the Landmarks Commission - that is regulated elsewhere in the City Code. The LDO only effects the review of private property as it relates to site development and municipal land use law.
Historic Districts	In the downtown historic district, there has to be a way for the historic commission to allow decorative fire escapes to be installed on multi use buildings that have no back or side to install one. Without the ability to do this, buildings in the downtown area will not be able to put housing in the upper floors.	We will look at encroachments into the right-of-way to allow fire escapes (and other building elements like steps) for buildings built at the lot line. We will also discuss this comment with the Landmarks Commission.
Category	Comment	Response
Administration: Variance	I did not see a list of conditions to be met that goes with uses denoted as "C" on table 8-1. Are those generated case-by-case?	Where there are no specific standards for a conditional use in Section 8.4, conditional uses will be evaluated against the standards in Section 8.1.B.3.
Administration: Variance	C Variance is not defined or explained. D variance is a little more so, but not much. I couldn't find them in the definitions section either.	The purpose statements for C and D Variance (Sections 13.7 and 13.8) define these variances.
Administration: Riparian Protection	Additionally, the plan should take steps to protect the waterways running through or adjacent to the City of Trenton. As Trenton sits on the Delaware River with tributaries running through the city, it is critical that land use ordinances address protections for the riparian zone to address ecological loss and flooding related issues. Ordinances protecting local waterways,	NJ State has created a model ordinance for riparian protection. This is a separate ordinance from the LDO. Article 20 (Development Checklist) will be reviewed to

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	including the Assunpink Creek, should purposefully regulate upstream development to ensure minimal impacts on the stream and buffer zone. Encouraging development as far from waterways and the riparian zone should be a high priority.	make sure that there is a cross-reference to these regulations.
Administration: Complete Streets	NJF supports the LDO's commitment to increasing bicycle parking. However, it is equally important to develop Complete and Green Streets with bike lanes so that it is safe to ride bikes throughout the city.	We will add a reference to Trenton's Complete Streets Design Guidelines and the associated checklist in the document to the Development Checklist (Article 20) for major site plans and major subdivisions.
Administration: Complete Streets	The City's Complete & Green Streets policy must be incorporated into the LDO. Here's one example of a community that's done the same: http://eatontownnj.com/wp-content/uploads/2021/05/Land-Use-and-Complete-Streets-Checklists.pdf	We will add a reference to Trenton's Complete Streets Design Guidelines and the associated checklist in the document to the Development Checklist (Article 20) for major site plans and major subdivisions.
Category	Comment	Response
Zoning Map	<p>I strongly oppose the zoning of the areas of the Greenwood-Hamilton district. This area, specifically the area between Market Street and High Street, and along High Street, is comprised almost entirely of single family attached homes, many of which are owner occupied and most of which are historical, including the row of houses along S Clinton between Market and High St., which are 200+ years old. In order to preserve the makeup and integrity of the neighborhood, I believe that the appropriate designation for this area should be RM-1.</p> <p>I also strongly oppose the designation of the area off Canal St (the Greenwood Ave culdesac) as TOD-1. This area includes owner occupied properties, and while there are issues with abandoned properties, should be developed as an extension of the S Clinton and High St. neighborhood. Kids in the neighborhood utilize the culdesac to play soccer and ride bikes, and developing this area as a Transit Oriented district would displace current residents and take away limited space for children in the neighborhood to use. I think a better use would be to develop this section as residential or mixed use low to moderate intensity commercial and residential, and include useable green infrastructure for the existing and thriving community in this neighborhood. This designation also cuts into lots on S Clinton that residents of the properties on S Clinton use for parking (parking is a HUGE issue for residents in this area already, and developing this area as high density would increase that issue and also take away existing parking opportunities), and appears to cut into lots that have existing single family attached homes (historical structures) on them.</p> <p>PLEAAAAASE do not pave our little part of paradise for the sake of expanding the Transit District and space for high density housing. They are already planning to construct two high density apartment buildings across the street that we don't want, and this would increase the permissibility and probability of development that threatens our current neighborhood ecosystem.</p>	<p>Thank you for your comment. We have reviewed the zoning map in the areas you have indicated, and have made some significant changes, including changing the TOD zoning at the intersection of Greenwood/Clinton/Market to RH-2 to be more reflective of neighborhood character. Additionally, much of the block between Clinton and Hudson has been shifted from C-MX to RH-1. Current high-rise development on the south side of Greenwood between Hudson and Chestnut has been changed to TOD to reflect this character.</p> <p>We encourage you to review the updated zoning map (Draft 2).</p>
Zoning Map	<p>The City should increase density in the area from Chestnut to Walnut by the Trenton Train Station. I live off Chestnut and this street has buildings practically falling apart on themselves. Trash, shopping carts and drunks. The only nice thing in the area is the urban farm which is a great amenity to the city. It's just really not the place for an urban farm. Come on, we have one of the prime locations along the northeast Corridor and we use it for single family/ 2 family homes and an urban farm. This should be the nicest part of the city besides the waterfront (whole nother issue that needs to be resolved).</p> <p>Trenton Council or Planning Board, please use this opportunity to make this a nice high density area with resatarunts and safe good bars and storefronts</p>	<p>Thank you for your comment. We have reviewed the zoning map in the areas you have indicated, and have made some significant changes, including changing the proposed zoning along much of Walnut Avenue to a combination of RH-2 and RM-2 (from RM-1) to better encourage walkable urban development within this area.</p> <p>We encourage you to review the updated zoning map.</p>

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	<p>on street level and housing above. I travel for work every now and then and it seems like most cities along the AMTRAK line have nice dense urban areas but all we have is these buildings falling apart and a neighborhood nobody feels safe in. Chestnut to Hollywood to Walnut are a no brainer for a dense little safe area people want to go. Plus the new development can provide jobs that are desperately needed in the area. The urban farm can be moved to another vacant block of the city. Make this happen please or at least consider making the City a nice place finally.</p>	
<p>Zoning Map</p>	<p>I've been renting on S Clinton for 2 years now, and as it is, it's already a high traffic area. I pay monthly for parking nearby as the parking in the area is extremely limited, and I imagine this would become more problematic with adding high density housing to the neighborhood. Aside from that, there are children in the area who already have a lack of area to play without busy roads.</p>	<p>Thank you for your comment. We have reviewed the zoning map in the area you have indicated, and have not proposed any changes. The proposed zoning along S Clinton is reflective of the developed character of this corridor.</p>
<p>Zoning Map</p>	<p>Zoning Map – the land surrounding the ballpark is zoned MU-T which limits the maximum building height to 50' (or 40' depending on use). The zoning for the site should be changed to allow for more intense development (suggest 110' maximum height)</p>	<p>Thank you for your comment. We have reviewed the zoning map in the area you have indicated, and have changed the MU-T designation to R-MX.</p> <p>We encourage you to review the updated zoning map.</p>
<p>Zoning Map</p>	<p>Downtown Most of this area is in the Hanover-Academy Landmarks District The proposed Zoning is C-MX with 120' height allowance. Most buildings in this district are 2-3 stories – is there an intention to remove landmarks so buildings can be torn down and replaced with 10 story buildings? Landmarks strongly dislikes demolition of buildings in the districts Landmarks application process needs to be coordinated better with Planning Board applications. This area falls within the Canal Banks Redevelopment Plan Area Most of the area is RC zoning with low rise limits – will the redevelopment plan prevail over new zoning?</p>	<p>Thank you for your comment. There is no intent to tear down landmarks. We have reviewed the zoning map in the areas you have indicated, and have made some significant changes, including changing much of the Old Trenton/Hanover/Academy area from C-MX to RH-2 to better reflect the character of this area.</p> <p>We encourage you to review the updated zoning map.</p>
<p>Zoning Map</p>	<p>The block across from City Hall fronting E State is DT – with 210' height, but the rear of the block is different zoning with 60' limit – there is no way to build a 20-story building on the front half of that block – the lots are only 100' deep. It doesn't make sense.</p>	<p>Thank you for your comment. We have reviewed the zoning map in the area you have indicated, and have changed the proposed zoning to DT.</p> <p>We encourage you to review the updated zoning map.</p>
<p>Zoning Map</p>	<p>Roebing Area On the Roebing Block 2 site the Zoning is RH-1. With height limits of 40'. Any new construction on this site would be limited to three stories – most new residential construction is 4-5 stories. It severely limits this vacant site development.</p>	<p>Thank you for your comment. This was an error on the previous map; it has been moved to TOD-1.</p> <p>We encourage you to review the updated zoning map.</p>
<p>Zoning Map</p>	<p>Adjacent to Roebing Block 2 site, currently a parking lot – is zoned TOD-1, with 135' height. This site is not large enough for a building of that size – plus it makes no sense to have a small lot be zoned for 120' height and the larger parcel next to it be limited to 30'</p>	<p>Thank you for your comment. The adjacent portion has been moved to TOD-1, correcting an error on the previous map.</p>
<p>Zoning Map</p>	<p>Transit District The state of New Jersey recognizes a 1/2 mile radius around transit stations as where density should be focused.</p>	<p>Thank you for your comment. We have reviewed the area around the Trenton Transit Center, and have made changes on Greenwood Avenue to balance density and historic character within this area.</p>

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	The Trenton Transit Station is a major Northeastern Hub, yet along Greenwood Avenue, just one block away from the Transit center is zoned RH-1	We encourage you to review the updated zoning map.
Zoning Map	On the south side of Greenwood – 400 block – there are four landmarks' houses – but zoning is proposed C-MX with 120' height. Is there an intention to remove the Landmarks designation on that block so those buildings can be razed to create a 10-story building? No property on that block can accommodate a 10-story building unless there is demolition.	Thank you for your comment. There is no intent to tear down landmarks. We have reviewed the area you have indicated, and have changed these parcels from C-MX to RH-1. We encourage you to review the updated zoning map.
Zoning Map	On South Clinton, that area is in the Roebling Gateway Redevelopment Plan area which is in conflict with the new LDO zoning.	Thank you for your comment. We have reviewed the zoning map in the area you have indicated, and have not proposed any changes. We do not see a conflict: I-MU is an appropriate zoning district to accommodate this area, and is in alignment with the Roebling Gateway Redevelopment Plan.