

camiros

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

To: City of Trenton
From: Camiros
Date: July 13, 2023
Re: Public Comment: LDO Draft 2

The following memorandum summarizes comments received on the second draft of the Land Development Ordinance (LDO). Staff and the Consultant have included responses to comments where appropriate.

LDO CATEGORY	COMMENT RECEIVED	RESPONSE
General Comment	<p>We are praying and hoping that our City can be modernized by removal and renovation of old properties and abandoned buildings. 2) finding the right placement for the homeless and mentally challenged citizens roaming our city. 3) bringing back businesses and popular fast food chains , etc downtown like every other city in this country. 4) More speed bumps around public housing and school.5) bring back Grayhound, Peter Pan, Trailways and other buslines back to Trenton.6) Transform those old factories around Trenton to apartments, malls, gyms, restaurants, etc to make our City Attractive.</p> <p>Right now, most people are thinking about leaving this city, let's do our best to keep Trenton alive. Thanks</p>	No change – thank you for your comment!
General Comment	<p>Peace, as we do outreach for this use it as a tool to engage, educate, and empower the people living here. We often look over, around, and pass the people who literally occupy the communities we say we want to redevelop and upgrade. As long as they are left out of the discussions, they will always rebel and remain missing in action when its time to work. Part of the deeply rooted apathy here which manifests in all areas, not just elections. Is rooted in people seeing themselves as renters, meaning someone else will always be responsible for Trenton's resurrection, just not them. Thats where we must change the game at. We train them to see the city as theirs, they will value it.....you don't destroy or neglect what you value.</p>	No change – thank you for your comment!
General Comment	I have no real comment at THIS time	No change – thank you for your comment!
General Comment	<p>I purchased my home in Berkeley Square in January 2020. It is located in a tranquil and beautiful neighborhood full of historic homes near one of the city parks. I am extremely interested in hearing more about how the "Trenton 250 LDO Update process will help to better preserve, strengthen, and protect the historic physical patterns of development that define the character of the City, direct reinvestment to targeted areas, and create new opportunities for economic development, helping to make Trenton a more sustainable, livable and business-friendly community." Please keep me posted. Thank you.</p>	No change – thank you for your comment!
Category	Comment	Response
Corrections	<p>List of Designated Historic Districts and Sites: - Change Mahlon Stacey Park to Mahlon Stacy Park (no "e") - The William Trent House is located at 15 Market Street and not 613 South Warren. The latter was its former address prior to the urban renewal efforts of the 1960s when New South Warren was realigned away from the massive state building complex.</p>	Make correction
Corrections	In section F dealing with the keeping of chickens, there is a redundancy "for less than five acres or less." (Accessory Structures)	Make correction

LDO CATEGORY	COMMENT RECEIVED	RESPONSE
Corrections	In Article 9.2. Sections A.1. and A.2, change: a. (A.1.) Multi-family and mixed-use developments with less than 10 dwelling units to: "with fewer than ten dwelling units." AND b. (A.2.) Where A the change of use results in less than ten dwelling units. To "with fewer than ten dwelling units"	Make correction
Corrections	Just a quick note to alert you that some of the headings on Table 8-1 Matrix are incorrect. Page 8-i 2nd heading heading at middle of page omits RM-1, but includes a non-existent RM-3 Pages 8-iii and 8-iv: The same error is repeated	Make correction
Category	Comment	Response
Parking	Parking and Bike Space Requirement (Table 10-2). It is unclear why Cemeteries are singled out as the sole category where a specified number (10) of biking spaces are required. All other categories in the table tie the required number spaces to GFA or usage. As a trustee of Mercer Cemetery, I am unsure how it might respond to this requirement since the facility is fully fenced and it is a designated historic site within the city. I recommend tying the requirement to GFA or some other indicator for consistency.	Because of the nature of cemeteries, it is hard to tie to gross floor area or square footage. This is a minimum number that we feel is appropriate as a baseline.
Category	Comment	Response
Watershed Institute	Article 1 Purpose We appreciate and emphasize! A. Emphasize Env Justice, resilience, sustainability, (+creativity!) C. Safe from disasters (incl flooding) J. ...desirable visual environment through creative development and good civic design...	No change – thank you for your comment!
Watershed Institute	Article 2 Definitions 1. 2.3 Why Eliminate 'Civic Space'? But no definition for Public Space? 2. Public ROW not in definitions (but in code along with View Corridors-also not defined?) 3. Add 'Bio Swale' (for SW mgmt. and aesthetic LA use)? 4. Green Space: "...set apart for recreational or aesthetic purposes in an urban environment." (ADD: environmental purposes...stormwater parks? Rain gardens?) Add 'Tree Canopy'? Add 'Rain Garden'? To Definitions? 5. 2.4 G Impervious Surface Coverage (need to add (it's missing) a definition for 'Pervious Coverage')	1. Civic space is defined in Article 9. No change. 2. Will add definition of public ROW and view corridor. 3. Will add definitions. 4. Green space is a specific term used in Article 9. No change. 5. Pervious is defined in the section above.
Watershed Institute	Article 2 Measurement 2.4 O. A Yard is the open space between the building line and lot lines. A Setback may be = or lesser than a yard. So... a yard must contain green space and pervious coverage?!...	Yard is a specific dimensional standard used in the LDO to control siting of certain elements such as accessory structures, required landscape, etc. It is not required to remain "green."
Watershed Institute	Article 3 Zoning Districts & Map We recommend that somewhere in the Master Plan, there is mapping that identifies stream corridors/ districts with accompanying overlay zones with the potential for daylighting sub surface waterways with green buffers. The diversion of stormwater runoff through green infrastructure before entering a waterway can contribute to increased water quality and decreased water quantity.	As noted, this would be appropriate for the Master Plan or other policy document. This is not a zoning control.
Watershed Institute	Article 4 Residential Districts Article 5 Commercial & Mixed-Use Districts Article 6 Industrial Districts We recommend that redevelopment sites, especially those with a 'change of use' or mixed-use project, have enhanced stormwater standards ('greenfield' regs?) so that former/existing impervious coverage is reduced, and stormwater management is improved with a redevelopment investment.	Stormwater management is controlled through ordinances outside the LDO.

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Watershed Institute	<p>Article 7 Special Purpose Districts 7.3 OS-R Open Space and Rec District</p> <ol style="list-style-type: none"> 1. Max Imp Coverage 30% but is any pervious surface 'Stormwater Performing Green Spaces?' 2. Add Blueway/Greenway Corridor? At Assunpink Creek corridor (make visible on a map!) <p>Add open space performing to mitigate climate change (restoration of tree canopy for example), collect stormwater, restore gardens with native plants, create habitat for birds and butterflies, etc. and serve other environmental purposes.</p>	<p>Stormwater management is controlled through ordinances outside the LDO. Standards such as these should be considered for those ordinances.</p>
Watershed Institute	<p>Article 8 Uses</p> <ol style="list-style-type: none"> 1. Should the city add a Land Use for Storm Water management (Climate Change mitigation, land restoration, stormwater buffer for historic sites, buy outs)? 2. 8.4 E Community Garden B. Community Garden DO Prohibits trees but when does an empty lot become a wooded green canopy space for CC/climate mitigation, local shade/cooling, part of an urban greenway/belt?) 	<p>Stormwater management would not be considered a principal use. The use of empty lots for climate mitigation is outside the control of the LDO.</p>
Watershed Institute	<p>Article 9 On-Site Development Standards</p> <ol style="list-style-type: none"> 1. 9.2 On-Site Green Space and Civic Space* Requirements (* Civic Space was removed from definitions?) 2. 2.b. Civic Space should include 2.a Green Space, iii. Public. It should include vegetation 3. In lieu of providing the required green space and civic space, the applicant may request that the Planning Board allow for a fee-in-lieu. The fee schedule contains the fee per gross square foot of nonresidential area and fee per dwelling unit when fee-in-lieu is utilized. These funds will be dedicated to the City of Trenton for the purpose of enhancing public spaces within the City. This does not necessarily contribute to resident well-being unless it is accessible to them Does the city have a 'green bank' for the fees? And then a plan prioritizing use of such fees? 	<ol style="list-style-type: none"> 1. These terms are defined within this section, rather than the definitions, per prior comments on the first draft. 2. We believe the standards are structured to provided needed flexibility for development. We do not recommend any changes. 3. The fee-in-lieu is a current standard.
Watershed Institute	<p>Article 9 On-Site Development Standards 9.3 Exterior Lighting Should 'Dark Sky' approved standards be considered in this?</p>	<p>We have crafted standards that work toward the goals of Dark Sky, but at this time the more complex administration of such standards is not feasible.</p>
Watershed Institute	<p>Article 9 On-Site Development Standards Accessory Structures & Uses I. Fences & Walls -consider adding porosity of fences and walls, especially in flood zones and at grade so water can move through rather than cause additional damage by being blocked or flow restricted. (foundation undermining can be result).</p>	<p>At this time, administration of such standard is not feasible.</p>
Watershed Institute	<p>Article 9 On-Site Development Standards Accessory Structures & Uses O. Outdoor dining Consider pervious surfaces (gravel or other decorative surface) for stormwater collection and green/planted borders at edges of adjacent impervious surfaces.</p>	<p>The LDO does not prohibit this. As a requirement it could be considered onerous.</p>
Watershed Institute	<p>Article 10 Off-Street Parking Spaces Consider Pervious/gravel/stone surfaces to allow stormwater to recharge in residential property. (10.3.C. Surfacing: prohibits gravel in parking lots) at Parking 'Facilities') 10.7 Driveway Design: how about pervious surfaces, gravel?</p>	<p>Pervious paving is permitted. Gravel is prohibited as loose gravel can damage storm sewer systems.</p>

LDO CATEGORY	COMMENT RECEIVED	RESPONSE
Watershed Institute	<p>Article 11 Landscape 11.1 Landscape Plan What about native plants? (add language) ... Encourage use of urban tolerant plants?</p>	<p>This is encouraged in 11.3.A.</p>
Watershed Institute	<p>Article 11 Landscape 11.4 Landscape Design Standards Add Stormwater management /Green Infrastructure landscaping B. Building Foundation Landscape (however...green infrastructure should not necessarily be at foundation. c. The remaining area outside of shrub and tree masses must be planted with perennials, live groundcover, native grasses, and other plantings. Alternatively, green infrastructure and stormwater management landscape techniques are permitted that meet the standards of the New Jersey Developers Green Infrastructure Guide. 11.6 Req Pkg lot LA C.2. Green infrastructure and stormwater management landscape techniques are permitted that provide screening of a minimum of three feet in height. Such plantings must meet the standards of the New Jersey Developers Green Infrastructure Guide. (MAKE REQUIRED?) 11.7 Required Pkg. Lot interior LA F. The use of stormwater management elements, such as sunken islands, perforated curbs, rain gardens and bioswales, is encouraged in landscape areas. (make required?) unless given waiver? 11.8 Buffer Yard Req (04.19.23) Should buffer yards perform as rain gardens/storm water management?</p>	<p>Stormwater management is controlled through ordinances outside the LDO. These landscape areas, as indicated, may be constructed as SWM areas, but at this time it is not appropriate to require such as the planting areas serve different purposes.</p>
Watershed Institute	<p>Article 11 Landscape 11.10 TREE CONSERVATION A. Intent Existing mature trees should be preserved to the maximum extent feasible to act as buffers between adjoining developments and as site amenities in common areas and open spaces. Where preservation is not feasible, trees that are removed should be replaced on-site with a comparable native tree (<u>why not replace one tree with 2 trees because of maturity delay...see D below 'Mature Tree Credit' that will reach the same size at maturity.</u> C. Site Plan Review: Tree Survey or Plan Requirement As part of site plan review, a tree survey depicting the species, size, location, and condition of any existing mature trees on the site by a land surveyor or registered arborist is required, including a preservation and replacement plan to demonstrate compliance with these standards. An applicant may use an aerial survey to estimate canopy coverage of the site, including the use of randomly selected sample plots within the survey area, to determine typical canopy coverage. The aerial survey may include species for the area covered by the aerial survey. (<u>Tree surveys, preservation & replacement plans should include the stormwater management performance of trees &/or a tree scheduled for removal so that alternative SW management strategies shall be provided</u>) D. Landscape Credit Existing mature trees preserved on a site that are of good health are credited towards fulfillment of the landscape requirements of this Ordinance with the exception of required parking lot islands. Every significant tree that is preserved within a required landscape area is credited as two required trees. A tree may only be credited once.</p>	<p>Tree conservation is a new provision focused upon preserving the tree canopy. Per A, there are additional tree planting requirements so the change is not needed. Per C, At this time, and in particular, as stormwater is controlled through other ordinances, the change would not be appropriate at this time.</p>

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Watershed Institute	<p>Article 13 Land Development Applications 13.5 OFF-TRACT IMPROVEMENTS Add Storm water management language (not just 'drainage') A-2-c. Drainage Improvements and Stormwater Management Stormwater management must meet both state regulations (N.J.A.C. 7:8, Stormwater Management) and the local regulations of Chapter 254 (Stormwater Management) of the City Code, as well as any other applicable regulations. Add BMP's Add Climate Change Mitigation/Green Infrastructure (off tract...)</p>	Stormwater management is controlled through ordinances outside the LDO and a reference has been included.
Watershed Institute	<p>Article 15 Historic District Regulations Historic Assets are often near waterways and are therefore fragile and subject to damage by flooding or heavy stormwater events. The preservation of culture depends upon Environmental/Stormwater mgmt. Consider: Flood prevention and Stormwater management for projects at/adjacent/near Historic Resources/sites/buildings shall exceed the minimal requirements.</p>	Stormwater management is controlled through ordinances outside the LDO.
Watershed Institute	<p>GENERAL QUESTIONS:</p> <ol style="list-style-type: none"> 1. Is there a site plan review committee? 2. Are there separate Redevelopment Standards? 3. Are urban arboretums permitted (in addition to community gardens)? 4. Are any environmentally compromised sites being remediated by Phytoremediation (and does that warrant a special use?) 5. Is Trenton considering a Storm Water Utility? 	<ol style="list-style-type: none"> 1. Site plan review is conducted by the Planning Board/Zoning Board of Adjustment 2. The standards of the LDO apply to development and redevelopment (Adopted Redevelopment Areas also have separate standards) 3. Arboretums are allowed as part of the "parks" use 4. This is outside the scope of the LDO controls 5. This is outside the scope of the LDO controls
Category	Comment	Response
Zoning Map	<p>A few suggested corrections on the revised Zoning Map for the LDO (March 2023) as they relate to the Island neighborhood (and adjacent areas)</p> <ol style="list-style-type: none"> 1) Riverside Drive begins at the Log Basin (Stacy Park) and continues northwest until it intersects with Clearfield Avenue at Rotary Park. 2) Clearfield Avenue begins at Lee Avenue and continues northwest (along Rte 29) until it intersects with Riverside Drive at Rotary Park. In fact, Clearfield Ave isn't named on the map at all. 3) Mt. Vernon is two blocks long; it begins at Clearfield and continues west to intersect with Riverside Drive. (Parts of Riverside Drive are mis-labelled as Mt. Vernon). 4) Riverside Drive does not exit to the east of Rte 29. That street is Riverside Avenue and it begins just south of Colonial Avenue and continues northwest (with an interruption at Parkside Avenue) at South Westfield Avenue. [Riverside Drive and Riverside Avenue overlap on either side of Rte 29 for ½ block and is a source of great confusion for inexperienced taxi and Uber/Lyft drivers.] 5) I believe, but I could be wrong that the street north of Lee Avenue and northeast of Rte 29 is Lasalle and not La Salle (similar to Laclede and Labarre). 	These are corrections needed to underlying layers of the map in GIS. They are technical corrections. We are exploring how to correct these items.
Zoning Map	Block 1601, Lot 12 should be changed from OS-R on the draft Map to RM-2. This is because this lot is specifically excluded from the State of New Jersey Recreation and Open Space Inventory being prepared for Trenton by BRS.	We will make the correction.
Zoning Map	Per WRT's review in relation to the work they are doing on the TOD Redevelopment Area Plans a map change was recommended: For Ewing-Carroll-Southard Redevelopment Area, the triangular vacant lots bounded by Ogden and Ewing Street will be better suited for C-MX to allow higher density in that corner – it will match the surrounding zoning district.	We will make the change.

LDO CATEGORY	COMMENT RECEIVED	RESPONSE
<p>Zoning Map – Hiltonia</p>	<p>Numerous comments were made regarding the zoning of the Hilltonia neighborhood. The below statement is in response to these comments:</p> <p>The majority of Hilltonia's proposed zoning is primarily RL-1, which is the equivalent zoning category for the current RA District. The small area on the north side of Stuyvesant has been proposed as a mix of RL-2 and RM-1, which reflects the current uses in the area. Finally, the neighborhood has areas proposed to be zoned OS Open Space and INST Institutional - these reflect these specific existing uses (parks and schools respectively).</p> <p>The following summarizes current uses allowed in RL-1, which applies to other areas zoned this district. The permissions are similar to the other RL Districts as well. As noted, some changes have been proposed for the RL Districts.</p> <p>PRINCIPAL USES (P = Permitted, C = Conditional)</p> <ul style="list-style-type: none"> • Bed and Breakfast - P - Typical use for single-family districts Action: CHANGE - Do not allow in RL-1 • Community Garden - P - Open space use, allowed in all districts Action: No change • Community Residence - P - Per Federal Fair Housing regulations, this use must be permitted Action: No change • Day Care Home - P - Per the State, this use must be permitted Action: No change • Dwelling - Single-Family – P – Purpose of district Action: No change • Educational Facility - Primary or Secondary - P - Typical use for single-family districts Action: No change • Live/Work - P - Action: CHANGE - Do not allow in all RL Districts • Lodge/Meeting Hall - P - Typical use for single-family districts Action: CHANGE Do not allow in RL-1 • Medical/Dental Office/Clinic - C - Allowed conditionally per City policy per Community Health and Wellness Plan Action: Continue to be conditional, but limited to a maximum gross floor area of 5,000sf • Neighborhood Commercial Establishment - C - Only allowed if the commercial establishment exists as of the effective date of the LDO Action: No change (There are no such uses in Hilltonia) • Park - P - Open space use, allowed in all districts Action: No change • Place of Worship - C - Per Federal regulations, this use must be permitted Action: CHANGE - Places of worship as permitted use in all districts • Private Recreation Club - C - Typical use for residential districts (country club, tennis club) Action: CHANGE - Do not allow in RL Districts • Private Social Club - P - Typical use for residential districts Action: CHANGE - Do not allow in RL-1 • Rooming House: Senior Citizen Owner Only - C - This is currently required by NJ State statute Action: No change • Shelter, Domestic Violence - P - Typical use for single-family districts Action: No change • Wireless Telecommunications - C,P - Per Federal regulations, this use must be permitted Action: No change <p>In addition, please note the RL-1 does not allow conversions of existing single-family dwellings to multiple dwellings.</p> <p>SUMMARY: USES ALLOWED PER RECOMMENDED CHANGES IN RL-1 REQUIRED BY FEDERAL OR STATE STATUTE OR BY CITY POLICY INDICATED</p> <ul style="list-style-type: none"> • Community Garden - P - Open space use, allowed in all districts • <u>FEDERAL</u> Community Residence - P - Per Federal Fair Housing regulations, this use must be permitted • <u>STATE</u> Day Care Home - P - Per the State, this use must be permitted • Dwelling - Single-Family – P – Purpose of district • Educational Facility - Primary or Secondary - P - Typical use for single-family districts • <u>CITY POLICY</u> Medical/Dental Office/Clinic - C - Allowed conditionally per City policy per Community Health and Wellness Plan Action: Continue to be conditional, but limited to a maximum gross floor area of 5,000sf • Park - P - Open space use, allowed in all districts • <u>FEDERAL</u> Place of Worship - C - Per Federal regulations, this use must be permitted Action: CHANGE - Places of worship as permitted use in all districts • <u>STATE</u> Rooming House: Senior Citizen Owner Only - C - This is currently required by NJ State statute • Shelter, Domestic Violence - P - Typical use for single-family districts • <u>FEDERAL</u> Wireless Telecommunications - C,P - Per Federal regulations, this use must be permitted 	

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Zoning Map – Hiltonia	Hiltonia is one of the few neighborhoods in the city of Trenton that has maintained its character and value as the city has declined over the past decades. This is a result of the stringent zoning laws currently in place for this neighborhood. Changing the laws would result in reduced value of the properties. The high property values result in higher tax revenue for the city. The proposed changes in the zoning laws are not in line with why people move to Hiltonia. Trenton's biggest problem is the lack of a middle-class tax base. I urge you to re-evaluate the changing of current zoning laws for this area and leave them as they are.	See above
Zoning Map – Hiltonia	I am concerned about the proposed changes to our residential zone. Ordinances are already barely enforced. If allowable use is broadened how will the city staff up to monitor and enforce ordinances?	See above
Zoning Map – Hiltonia	I object to any changes being made to zoning or variance in Hiltonia, I believe it would prove detrimental and adversely affect the quality of life to allow multi family homes, or any type of business/ commerce. Hiltonia is not in need of any changes.	See above
Zoning Map – Hiltonia	I think current zoning laws as they apply to Hiltonia should not be changed.	See above
Zoning Map – Hiltonia	I have lived in Hiltonia for 33 years. Changing the zoning law for this neighborhood would be a mistake. This quiet location should stay the way it has been zoned in the past.	See above
Zoning Map – Hiltonia	Do not change our zoning laws in Hiltonia	See above
Zoning Map – Hiltonia	I definitely am not in favor of lowering Zoning standards in this neighborhood. One reason it has remained stable since the 20s is because it is strictly a one family, residential neighborhood. And we still have problems. If you start allowing nursery schools, boarders, apartments, car repairs, etc., the neighborhood will deteriorate quickly. Quite a few people from Princeton, the Windsors, and NYC have purchased houses here since 2019 since they can get lovely houses at relative low prices. If you lower the zoning standards, it will not be as desirable a location to purchase a home and your tax base will deteriorate rapidly.	See above
Zoning Map – Hiltonia	I do not agree with rezoning Hiltonia to allow businesses to operate and to change from single family homes to multi-family and boarding. The changes would more than likely decrease our property values.	See above
Zoning Map – Hiltonia	Please do not change the zoning for Hiltonia. These lighter restrictions will have a negative impact on our beautiful neighborhood.	See above
Zoning Map – Hiltonia	We object to the Hiltonia neighborhood being opened to residential uses beyond single family only zoning. We oppose the change because we value the safety and security we find here and because we are concerned with the potential correlates of increased population density	See above
Zoning Map – Hiltonia	It makes absolutely no sense to change the zoning in Hiltonia to one with less restrictions. It is one of the most stable, diverse neighborhoods in the City, holds its value and is a wonderful and active neighborhood in which to live. What we do have is a lack of support and enforcement in maintaining the neighborhood's current zoning. We have car repair shops in folks' driveways, illegal day cares and boarding houses, slum landlords flipping houses without proper permit and inspections leading to ordinances being ignored on a regular basis. What we need is more inspectors and law enforcement to help maintain this vibrant neighborhood. Before making any changes, which I feel would be entirely detrimental to this neighborhood, come and visit Hiltonia. You will see what I am talking about!	See above
Zoning Map – Hiltonia	The Hiltonia Association Board and many of our members and neighbors care deeply about preserving the residential character of our neighborhood. Since its establishment in the mid 1920s, Hiltonia has been one of the most stable areas of Trenton. For ALL that time, single-family residential homes have been the only allowable use in Hiltonia. Why would we want to change that now?	See above

LDO CATEGORY	COMMENT RECEIVED	RESPONSE
	<p>The proposed zoning changes broaden the allowable uses, and those changes will alter the character of Hiltonia, reduce property values, and affect quality of life.</p> <p>We strongly believe that loosening the zoning in the city's most stable area would be contrary to Trenton's aims for positive growth. It seems obvious that more effective code enforcement would improve conditions citywide.</p> <p>We strongly believe that loosening the zoning in the city's most stable area would be contrary to Trenton's aims for positive growth. It seems obvious that more effective code enforcement would improve conditions citywide.</p> <p>We see the effects of lax code enforcement every day in Hiltonia, and the prospect of broader use under the current system is alarming. A few examples:</p> <p>Commercial trucks and vehicles with business advertising park on our streets (often against the flow of traffic) and in driveways.</p> <p>Construction businesses are operated out of single-family homes, and yards are used to store contracting supplies.</p> <p>Homes have yards littered with cars that are unregistered (and/or with expired inspections), appliances, trailers, and boats.</p> <p>Homes have yards littered with cars that are unregistered (and/or with expired inspections), appliances, trailers, and boats.</p> <p>Homes are being used as multifamily dwellings and boarding houses.</p> <p>It has become common practice to place yard debris in the streets.</p> <p>The current stringent zoning is already a struggle for the city to oversee, with obvious negative effects in Hiltonia.</p> <p>We, the Hiltonia Association, and our neighbors are against the LDO allowing additional uses beyond our current single-family homes.</p> <p>We urge Trenton leadership to reconsider broadening the allowable uses in Hiltonia. Keep Hiltonia residential to preserve its quality of life, serene setting, and property values.</p>	
<p>Zoning Map – Hiltonia</p>	<p>As I read about the proposed new allowable uses for our L-1 neighborhood, I see educational facilities, lodges, medical offices and commercial uses. Any one of these would entail serious changes in the character of our neighborhood, introducing a commercial environment, heavy traffic flow, etc. Once you change the character of a purely residential area, you have lost something precious for a city, and one that can never be regained. Our neighborhood and the joining neighborhoods attract residents that stay and have an investment in the welfare of the city. I believe that the proposed changes are not in Trenton's interest.</p>	<p><i>See above</i></p>
<p>Zoning Map – Hiltonia</p>	<p>I have been a resident of Trenton for most of my life. My family moved here in 1963, and we lived in a row house on Colonial Avenue while I was growing up (a home my parents rented). I attended the Cadwalader School, Junior HS #3 (subsequently renamed Holland Middle School, and graduated from Trenton Central HS in 1973. I left Trenton for college, graduate school, and career until I moved back in 1990 and then purchased my first home here in 1991 in Hillcrest. I moved to my current home in Hiltonia in 2003.</p> <p>Needless to say, I've seen Trenton change in many ways over those years. I chose to live here and purchase homes here because of my dedication to the city and my commitment to the vision of what Trenton can be if its enormous potential is realized: a thriving community in which individuals and families choose as a wonderful place to live and raise their families.</p> <p>So I am very eager that the new plan for the city be a viable one that will help Trenton thrive again--and that requires first an foremost strong neighborhoods that join together into a vibrant community that meets the needs of its residents while creating the economic vitality that is the pre-condition for all the goals for the vision outlined in Trenton 250.</p>	<p><i>See above</i></p>

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	<p>My concern about the LDO draft 2.0 revolve around my neighborhood, Hiltonia, here designated as an RL-1 neighborhood. My concern is that the draft contemplates permitting uses in RL-1 that would not enhance the quality of life here--but detract from it. Specifically, allowing commercial activities such as bed and breakfast establishments, neighborhood commercial establishments, schools, churches, rooming houses, private clubs, and the like will detract from what makes our neighborhood so homey and beloved. I do not for the life of me see what value there is in letting commercial enterprises and organizations like clubs operate in our neighborhood. We have a strong community here where neighbors know one another and look out for one another. These new uses would jeopardize that community--one that in so many ways already has achieved the goals listed as the objectives of the Ordinance as listed in section 1-3 of the draft. In other words, we want to build on what we have in this strong community, not detract from it.</p> <p>The Objectives in Section 1-3 that our community has already achieved and exemplify are as follows: *We have in Hiltonia a population density ideal for a residential neighborhood--a density that has proven itself to allow the community to thrive and neighbors to support one another. We clearly have a neighborhood that "promotes the well-being of its residents" (Objective F) *We have in Hiltonia great light and air and treescape (Objectives D and H) *We have in Hiltonia a highly "desirable visual environment" that we seek to preserve and enhance (Objective J) *We have in Hiltonia a community that has worked over the decades to "promote the conservation of historic sites" and preserve the original character of our houses and our landscape (Objective K)</p>	

SUMMARIES OF ADDITIONAL REVIEWS

Additional reviews were conducted by outside consultants that assist the City of Trenton in development reviews. We have not included these comments above but have provided the following summary of comments and changes.

Taylor Design Group – Consultant for the City of Trenton Planning Board

The Taylor Design Group (TDG) has provided a detailed review of the document. Recommendations were made that help to clarify regulations within the draft and resolve any inconsistencies. A separate document showing these changes and responses is available from the City.

In addition, a memorandum with specific recommendations was also provided. Upon review of the memorandum, we propose to include the following suggested changes:

- Sign band should be defined and should be made part of the sign portion of the ordinance to reduce improperly placed signs on commercial structures' walls in particular.
Sign band to be defined and additional standards added about sign placement on facades.
- Acceptable Plant Materials, and Specifications:
 1. Street trees must be single trunk, full, and uniform specimens with a minimum caliper of 2.5" at the time of planting and must be balled and burlapped.
 2. Street trees, parking lot trees and trees near walkways must be single trunk, full, and uniform specimens, and must have branching not lower than 7' above grade to avoid conflicts with pedestrians, vehicles, or signs. Any trees located within any sight triangle must be approved by the Board or Inspecting Engineer.

3. All plants must be planted in accordance with appropriate planting details and notes, to ensure the proper installation, survival, and growth of all plants.
4. Tree varieties must exhibit desirable characteristics, such as full symmetrical form, deep noninvasive root system and tolerance of potential drought and road salt, should be utilized.
5. No tree can interfere with utilities, roadways, sidewalks, street or parking lot lighting, sight distances, driveway aprons or fire hydrants.
6. Replacement trees must conform to the type of originally planted tree in a given area, provided that, if any deviation is anticipated, it must be done only with the written permission.

We will add standards 1, 3, 4, and 5.

- Stormwater Management Areas.

Stormwater management areas include bioretention systems, constructed stormwater wetlands, detention and infiltration basins, drainage ditches and swales, and wet ponds. Stormwater management areas and plantings must be designed in accordance with New Jersey Stormwater Best Management Practices Manual (BMP). Sensitive designed basins and swales can be a visually pleasing benefit to the health, welfare, and safety. The general design concept of these areas should be to deemphasize their function creating aesthetic landscape features.

1. The area must be graded creatively to blend into the surrounding landscape and the design of the site, i.e., provide an informal meandering edge with varying slopes and gentle berming in locations emulating a natural topographic feature.
2. The perimeter, side slopes, and bottoms of stormwater management areas must be planted with shade trees at the rate of one tree for 1,000 square feet of area, subject to approval of the board engineer. Of this quantity, 10% must be 2" caliper trees, 20% must be 1.5" caliper trees, and 70% must be 1" caliper trees.
3. Additional shrub and herbaceous plant material should be planted in accordance with the New Jersey Stormwater Best Management Practices Manual, Chapter 7, "Landscaping". Special preference should be given to those species of trees and plants which have known pollutant-removal abilities. When other ornamental plants are used, they must be types compatible with the natural environment.

We will add a revised version of this standard when stormwater areas are part of the site; however, this does not include item 1.

Bright View Engineering, LLC – Consultant for the City of Trenton Planning Board: City of Trenton request for review: Article 10. Off-Street Parking & Loading

Bright View Engineering specifically reviewed the parking provisions of the draft LDO. At this time, no changes are proposed regarding the following items identified:

- Standards for Off-Street Parking Facilities – Dimensions. For high turn-over parking (i.e., Bank, Post Office, Convenience Store), we recommend adding 18" to the stall with and to provide hair pin striping.
Do not recommend increasing; the LDO does not prohibit this type of design.
- Maximum Vehicle Parking Spaces – Pick-up/Drop-off spaces. We recommend that the City specify a time limit for the Pick-up/Drop-off spaces. A maximum of 15 minutes parking is recommended.
This is not within the scope of the LDO.
- TDM Required – Transportation Demand Management (TDM) Plan. We recommend that the City add section iv.: A TDM plan will be required for new construction of a proposed development that will generate 25 peak hour trips and/or 50 average daily traffic (ADT) based on the most recent edition of the ITE Trip Generation Manual.
This is a different approach than that proposed within the LDO and would significantly increase the amount of projects subject to TDM.
- TDM Parking Requirements – Baseline Parking Demand. Please specify/justify the 15% discount for the calculated number of parking spaces based on the ITE Parking Generation Manual (most recent edition).
This is based on Trenton's built urban form, which acknowledges that the City was not historically designed for significant parking areas.
- TDM Strategies – Availability of off-street parking facilities. We recommend that the City add a condition or limitations on how many developments will utilize or share the nearby off-street parking facilities.
This is part of the TDM evaluation.

- TDM Strategies – Shared Parking Facilities. We recommend that the City specify what counts as shared parking facilities. (i.e., bike, mass transit, car service, complementary uses (office/residential, residential/transit, residential/neighborhood retail).
We believe the TDM strategies are clear.

George D. McGill, Esq. - City of Trenton Planning Board Attorney

The Planning Board Attorney has reviewed the document for compliance with New Jersey Municipal Land Use Law (MLUL). Recommendations were made based upon legal requirements within the MLUL and many of the changes accepted ensure the LDO does not violate the State's requirements and/or provide clarification with no substantive change. However, certain changes, again to align with the MLUL, are more substantial and are highlighted in the memorandum. *Please see the separate memorandum for the comments and responses.*