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March 15, 2021

Mr. Thomas Fey, Chairman
Alpha Borough Land Use Board
1001 East Boulevard
Alpha, NJ 08865

Re: **Completeness Review & Technical Review**
Final Major Site Plan
Alpha Commerce Center
Block 98, Lot 1
Our Project No. 3202.037

Dear Chairman Fey & Board Members:

The following letter is an update to our letter issued January 1, 2021.

This office is in receipt of the following documents as related to the above referenced application:

- A. Borough of Alpha Final Site Plan Checklist.
- B. Borough of Alpha Preliminary Site Plan Checklist.
- C. Waiver Request for Completeness. Prepared for Alpha Commerce Center, Block 98 Lot 1, Standard St., Alpha Borough, NJ. Prepared by E&LP, not signed, and dated October 16, 2020.
- D. Resolution 2020-06, Borough of Alpha Land Use Board, for Preliminary Major Site Plan Approval and Variance Relief as to Block 98, Lot 1 (0 Standard Street – Industrial Zone) Approved February 19, 2020.
- E. Conditional Approval from Warren County Planning Department for Standard Street Alpha Property, LLC, dated August 25, 2020.
- F. Plan Set entitled, “Preliminary Major Site Plan for Alpha Commerce Center, Block 98 Lot 1, Tax Map Sheet No. 16 Alpha Borough, Warren County”, prepared by Engineering & Land Planning Associates, Inc., and consisting of 21 pages. Signed by Wayne Ingram, NJ PLS and PE, applicant’s engineer, and dated 7/2/19, last revised October 16, 2020.

VanCleeEngineering.com

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Toms River NJ • Hamilton NJ • Doylestown PA • Bethlehem PA
Mechanicsburg PA • Leesport PA • Newark DE

- G. Stormwater Management Report prepared for Alpha Commerce Center, 0 Standard St., Alpha Borough, Warren County, New Jersey. Prepared by E&LP, signed by Wayne Ingram, PE, and dated May 27, 2020.
- H. Existing and Proposed Drainage Plan for Alpha Commerce Center, Standard Street, Block 98 Lot 1, Borough of Alpha; consisting of two pages, prepared by E&LP, signed by Wayne Ingram, PE and dated 6/25/19.
- I. Traffic Impact Study prepared by McDonough & Rea Associates, Inc. dated September 16, 2019.
- J. Environmental Impact Statement prepared for Alpha Commerce Center, 0 Standard St., Alpha Borough, Warren County, New Jersey. Prepared by E&LP, signed by Wayne Ingram, PE, dated June 25, 2019, and last revised February 13, 2020.
- K. Projected Daily Water Demand calculations prepared by E&LP submitted November 9, 2020.
- L. Projected Sewer Discharge calculations prepared by E&LP submitted November 9, 2020.
- M. Correspondence prepared by NJTransit dated November 20, 2020 (received March
- N. Architectural Plan set entitled "Alpha Commerce Center 0 Standard Street Block 98 Lot 1, Borough of Alpha, NJ" prepared by Debarbieri Architecture consisting of 4 pages dated July 12, 2019 (not signed and title block is not complete).
- O. Owners Consent dated December 20, 2021.

I. Project Description:

The Applicant previously received preliminary major site plan and variance approval to construct two (2) warehouse buildings totaling 575,900 s.f. on Block 98 Lot 1 within the I-Industrial Zone of the Borough. The Applicant agreed to wait to apply for final major site plan approval until after the extension of Industrial Way and is now seeking final major site plan approval. The application proposes 578 parking spaces (previously 576 parking spaces), loading docks, roof top solar systems and access routes. The project proposes to disturb an area greater than one (1) acre and will include more than 0.25 acres of new impervious cover. The applicant is requesting was previously granted variances from several of the bulk standards, as is discussed in the Zoning Description section of this report.

Building 1 is proposed to be 270,900 sf. constructed in the southern half of the property and Building 2 is proposed to be 305,000 sf. constructed in the northern half of the property. Both buildings are proposed to be surrounded on all sides by parking stalls with proposed concrete loading areas to the rear of the buildings (along the western sides of the buildings).

It appears from the Site Plan (sheet 4 of 21 in the plan set) that the main entrance to the site will be at the southeasterly corner of the property via a proposed roadway extending from the existing Industrial Drive located on the adjacent property to the east. The site plan also indicates a proposed “grass paver emergency access route” at the northeasterly corner of the property, connecting with the existing Seventh Ave / Standard Street.

II. Property Description:

The property is approximately 37 acres in size and is presently in an agricultural use. It is bounded on the north by a paper street named “Standard Street” and residential uses along E. Vulcanite Ave; to the west by an abandoned freight rail line; to the south by Interstate Route 78 and the Pohatcong municipal border; and to the east by forested area and the quarry on Industrial Road.

III. Preliminary Approval Compliance Discussion:

The Applicant is proposing a building height of 43 ft. where a maximum of 35 ft. was proposed on the approved preliminary site plan and proposes lot coverage of 35.63% whereas under preliminary approval 35.60% was approved, as such both these changes warrant an amended site plan application. Additional variances may be required to address the building height requirement for the industrial zone, as the **published code** indicates a height of 35 is the maximum permitted whereas the application is proposing 43.

IV. Completeness Review:

The checklists for Preliminary Major Site Plan Review and Final Major Site Plan Review require several waivers for the Board to consider. The Board shall also confirm they received a formal copy of the application which indicates the Applicant has requested an amended preliminary site plan approval and final site plan approval at this time. If the Applicant has only requested Final approval, the application should be deemed incomplete and the applicant shall resubmit a new application for amended preliminary approval and final site plan approval.

1. General Submission Checklist:

- a. §315-4.A Development Staging
Temporary Waiver Required – The Applicant shall provide testimony to address requirement to submit information on the staging of the development.
- b. §315-5.A Proof from the Alpha Borough Tax Collector or other designated official that no taxes or assessments for local improvements are due or delinquent on the property for which the site plan application is made.
Temporary Waiver Required – The Applicant shall request a temporary waiver from this requirement or provide a current certification of taxes.

- c. §315-5.B(1)&(2) Ownership Disclosure
Temporary Waiver Required – The Applicant shall request a temporary waiver from this requirement or provide the required information.
- d. §315-7.B Hearing. The Planning Board shall set the time and date of a public hearing on the preliminary application. The applicant shall cause notice of the hearing to be published in the official newspaper of the municipality or in a newspaper of general circulation in the municipality at least 10 days prior to the hearing. The cost of said notice shall be paid by the applicant. The applicant shall also mail notice of the hearing at least 10 days prior thereto, addressed to the owners, as the names appear on the municipal tax record, of all property within 200 feet of the extreme limits of the subdivision. The notice of hearing shall contain a brief description of the property involved, a statement as to its location, a list of the maps and other documents to be considered and a summary statement of the matters to be heard. Copies of the maps and other documents to be considered at the hearing shall be filed in the office of the Borough Clerk. Such copies shall be made available at such office for public inspection. Adequate proof of compliance with this subsection shall be furnished by the applicant prior to the hearing.
The hearing date will be set upon the application being deemed complete.
- e. §315-7.E.(1) Certification from the Board of Health of the Borough of Alpha approving the method and type of sewage disposal and water supply.
Temporary Waiver Requested – Applicant has requested a temporary waiver from this requirement.
- f. §315-7.E.(2) Where water or sewage service is to be obtained from a municipally owned system, certification from the appropriate agency that it has consented to supply such service.
Temporary Waiver Required – Applicant shall request a temporary waiver from this requirement or submit proof of certification of sewage disposal and water supply.
- g. §315-8.F.(1) A letter containing a list of all items to be covered by a performance guaranty (cash or certified check) pursuant to § 57-21, the quantities of each item, the cost of each item and the total amount of all items.
Temporary Waiver Required – Applicant shall request a temporary waiver from this requirement or provide required letter.
- h. §315-8.F.(3) A letter from the applicant's engineer stating that the final plan conforms to the preliminary plan, as submitted and approved.
Temporary Waiver Required – Applicant shall request a temporary waiver from this requirement or provide required letter.

- i. §315-9.A.(1) The Plan size shall be either 15" x 21" or 24" x 36"

Waiver Required – The applicant utilized plan sheets exceeding the permitted plan size, our office has no objection should a waiver be granted.

2. **Preliminary Site Plan Submission Checklist:**

- a. §315-9.C.(3)(g) All existing and proposed signs, utility poles and their size, type of construction and location.

Waiver Requested - Applicant requests a waiver from depicting offsite utility pole information related to their size and type of construction. Our office has no objection should this waiver be considered by the Board.

- b. §315-9.C.(3)(l) An analysis of all existing and proposed utilities and an analysis of the capacity of the existing utilities to accept the proposed facility.

Temporary Waiver Required – Applicant has provided calculations for projected daily water demand and sewer discharge, but has not provided an analysis of the existing utilities to accept the proposed facility. Board should obtain testimony from Applicant should the Borough not be able to provide water or sewer service to project. Recent projects in the industrial park were required to have contingencies to include provisions for water service from private well.

- c. §315-9.C.(3)(o) The location, size and nature of all existing and proposed rights-of-way, easements and other encumbrances which may affect the lot or lots in question, and the location, size and description of any lands to be dedicated to the Borough or to the county.

Waiver Requested – The Applicant indicates no easements exist on the property and no utility easements are proposed. Our office recommends the Board require the Applicant to provide information at this time. The Applicant would need easements for water and sewer connections and stormwater related easements.

- d. §315-9.C.(3)(p) The location, size and nature of the entire lot or lots in question, and any contiguous lots owned by the developer or in which the developer has a direct or indirect interest, even though only a portion of the entire property is involved in the site plan for which approval is sought; provided, however, that where it is physically impossible to show such entire lot or lots contiguous lots on one map, a key map thereof shall be submitted.

Waiver Requested – Applicant has requested a waiver from this requirement as no lands are contiguously owned.

- e. §315-9.C.(3)(q) Plans and profiles of streets adjoining the property for a distance of 500 feet in either direction, including the location of driveways and intersecting streets and an indication of the maximum available sight distance.

Temporary Waiver Requested – Applicant has requested a temporary waiver from this requirement as the road that will service this site has to be designed/constructed by other, which may be the Borough.

- f. §315-9.C.(3)(t) Proposed stages or development sections, if any, and the appropriate schedule for implementing each stage or section.

Waiver Requested – Applicant has requested a waiver from this requirement as no phasing of construction is proposed.

- g. §315-9.C.(5)(2) The preliminary site plan shall be accompanied by an environmental impact and community facilities analysis prepared in accordance with Chapter 350, Subdivision of Land.

Waiver Requested – The Applicant requested a waiver from submitting the required community facilities analysis and stated no adverse impact to surrounding community services are anticipated. The Board should require testimony from the Applicant to address this requirement.

3. **Final Site Plan Submission Checklist:**

- a. §315-9.D.(1) An application for final site plan shall be substantially the same as the approved preliminary site plan or a stage or section thereof; however, it shall show final and detailed design and engineering which shall be designed in accordance with the review and design guidelines in § 315-10.

Temporary Waiver Required – Testimony shall be provided for the Board to determine if plan conforms to preliminary approval plan if applicant did not request amended site plan approval.

- b. §315-9.D.(3)(b) An affidavit of the owner and other parties in interest that the site plan is submitted with their knowledge and consent.

Incomplete – Applicant shall request a waiver from this requirement or provide required affidavit.

- c. §315-9.D.(3)(j) Architectural floor plans for each floor of the building or structure and elevations from all principal exposures of all buildings or structures on the sites, but not less than four, with the name, address and registration number of the licensed architect preparing the plans.

Incomplete – The applicant provided plans but they were not signed and did not indicate the professional of the architectural firm who prepared the plans.

- d. §315-9.D.(3)(o) The location, type and size of all existing and proposed catch basins and storm drainage facilities with profiles thereof, including design calculations, plus all required design data supporting the adequacy of all existing facilities to accept the additional stormwaters.

Incomplete – Storm sewer profiles have only been provided for proposed storm sewers along the main roadway. Applicant shall request a temporary waiver from this requirement or provide profiles for all proposed storm sewers.

- e. §315-9.D.(3)(q) The location, size and nature of all existing and proposed rights-of-way, easements and other encumbrances which may affect the lot or lots in question, and the location, size and description of any lands to be dedicated to the Borough or to the county.
Waiver Requested – The Applicant indicates no easements exist on the property and no utility easements are proposed. Our office recommends the Board require the Applicant to provide information at this time. The Applicant would need easements for water and sewer connections and stormwater as well as ROW or easement for railroad crossing.
- f. §315-9.D.(3)(r) The location and size of all sanitary sewer lines and profiles thereof.
Temporary Waiver Required – Sanitary sewer profiles have only been provided for some of the proposed sanitary sewers. Applicant shall request a temporary waiver from this requirement or provide profiles for all proposed sanitary sewers including the proposed force main.
- g. §315-9.D.(3)(s) Location, size and type of all proposed utility lines and structures, including but not limited to telephone, electric, water, sanitary sewer, gas and CATV, and letters from each that the facilities are adequate to serve the site development.
Temporary Waiver Required – Applicant shall request a temporary waiver from this requirement or provide letters from each utility company that the facilities are adequate to serve the site development.
- h. §315-9.D.(3)(t) The location, size and nature of remaining lands or contiguous lots in which the developer has a direct interest.
Waiver Requested – Applicant has requested a waiver from this requirement as there are no remaining lands or contiguous lots in which the developer has a direct interest.
- i. §315-9.D.(3)(u) All proposed easements and public community access.
Waiver Requested – Applicant has requested a waiver from this requirement as no public access easement is proposed, however public access may be required for the extension of Industrial Drive through the site. In addition, pedestrian access to the site should be considered.
- j. §315-9.D.(3)(v) The location, size and type of all proposed off-site improvements.
Incomplete – Applicant has requested a temporary waiver from this requirement as the adjoining streets for this project have yet to be constructed. During the hearing of Preliminary Site Plan, it was determined that Final would be predicated on the extension of Industrial Drive. To date there is no information provided as to the status of the required Landfill Disruption Permit and status of construction for the road extension. The need for a Developers Agreement was also discussed at the Preliminary hearing. To date there is no information provided on the status of the Developers Agreement.

- k. §315-9.D.(3)(w) All points of vehicular ingress and egress for the site, indicating the size of driveways and sight triangles.
Incomplete – Applicant shall request a waiver from this requirement or provide sight triangles of each driveway entrance. The Board should note the site does not have access and is relying on the Borough to construct an extension of Industrial Drive, any approval should include language to how this extension should be constructed and cost share required through a developers agreement and provisions to require the applicant to return to Board for amended approval should the Industrial Drive improvements not occur. Further the extension of the road to support the site would require stormwater drainage improvements which the site has not factored in their design. There is additional offsite traffic circulation items that impact the site access particularly for tractor trailer access and navigation.
- l. §315-9.D.(3)(z) Location and design of all fire prevention measures, including emergency lanes, hydrants, sprinkler and siamese connections and fire zones.
Temporary Waiver Required – Applicant shall request a temporary waiver from this requirement or revise the plans to include the location emergency lanes and whether the proposed buildings will contain sprinklers.
- m. §315-9.D.(3)(aa) The present and proposed number of units and number of tenants, employees, customers or occupants of each unit and a summary of the total number of each expected to be on the site each day.
Waiver Required – Applicant has requested a waiver from this requirement as the building use and number of employees are included in the Projected Sewer Discharge and Water Demand reports. The Board should require the Applicant to provide testimony regarding this requirement.
- n. §315-9.D.(3)(ee) A complete list of the site improvements, except principal and accessory buildings, by item, and the quantities thereof to be constructed.
Temporary Waiver Requested – Applicant has requested a temporary waiver from this requirement.
- o. §315-9.D.(3)(ff) Copies of all applicable local, state and federal permits that may be required.
Temporary Waiver Required – Applicant shall request a temporary waiver from this requirement or provide the required information.

V. Zoning

The project is located in the I-Industrial District of the Borough where warehouses are a permitted use (per §410-20.A.6) and solar production systems are a conditional use (per §410-20.D.2). The table below describes the bulk standards required (per §410-21) of the Borough code for the district and what the applicant is proposing with this project:

I-Industrial District

	Required	Proposed
Area (acres)	2	37.104
Max. Lot Depth (ft.) – Industrial Drive	400	980 (V)
Max. Lot Depth (ft.) – Standard Street	400	2,276.83 (V)
Max. Lot Width at Street (ft.) - – Industrial Drive	200	
Max. Lot Width at Street (ft.) – Standard Street	200	941.59
Min. Front Yard (ft.) – Industrial Drive	75	97.01
Min. Front Yard (ft.) – Standard Street	75	106.7
Min. Rear Yard (ft.) – (I-78 Lot Line)	75	75.7
Min. Rear Yard (ft.) - (Rail Road Lot Line)	75	187.3+/-
Max. Building Height (ft./Stories)	43 ft. / 1 stories	43 ft. / 1 stories
Max. Lot Coverage (%)	30	35.63/70.02 +/- (V)
Max. Street Frontage (ft.)	200	25

(V) = Variance Required

1. Variances

For purposes of the application the property was considered a corner lot (§410-27) with front yards on Industrial Drive, Standard Street and Seventh Street and whereas the rear yards consist of the rail road right of way and Interstate 78.

- a. **§410-21 Area, Yard and Building Requirements – Maximum Lot Depth – Standard Street**
 Variance Required – Applicant existing lot depth of 2,276.83 feet exceeds the maximum permitted lot depth of 400 feet. The Applicant is not purposing to alter the lot depth. This variance was approved under preliminary site plan approval.
- b. **§410-21 Area, Yard and Building Requirements – Maximum Lot Depth – Industrial Drive**
 Variance Required – Applicant existing lot depth of 980+/- feet exceeds the maximum permitted lot depth of 400 feet. The Applicant is not purposing to alter the lot depth. This variance was approved under preliminary site plan approval.
- c. **§410-21 Area, Yard and Building Requirements – Maximum Lot Coverage**
 Variance Required – Applicant proposes 2 buildings and additional accessory structures/uses that total **35.63%** coverage whereas 30% is permitted. A variance is required up to 70.02% to include parking and driveways. This variance was previously approved under preliminary site plan approval for 35.60%.

- d. §410-25.C Roof-mounted solar panels and solar panel arrays not exceeding a height of 12 inches from the existing roof surface of a peaked roof and not exceeding a height of four feet from the existing roof surface of a flat-roofed structure and not resulting in an overall height in excess of that permitted for the principal structure in the zone district in which the principal structure is located shall be a permitted accessory use in all zone districts.

Clarification Required – Applicant indicates consideration of installation of roof top solar array, but did not provide sufficient information with application. Applicant shall provide testimony to address roof top solar panel requirements or identify needed relief.

2. **Conditional Use Variance**

- a. §410-20.D.(2).a Any applicant proposing a solar production system must file conditional use and site plan applications with the Land Use Board and obtain site plan and all other requisite Board approvals, including conditional use approval, in accordance with Chapter 315, Site Plan Review.

Verification Required – The Board shall confirm notice of hearing publication include conditional use. The application does not appear to reference request for conditional use approval.

- b. §410-20.D.(2).c The site shall contain an area of six acres for each megawatt (MW) of electrical energy to be produced.

Testimony Required – The Applicant shall provide testimony to comply with requirement, should system exceed limits, and Applicant shall obtain a use variance.

- c. §410-20.D.(2).d The design output capacity of a solar production system shall not exceed 10 megawatts (MW).

Testimony Required – The Applicant shall provide testimony to comply with requirement, should system exceed limits, and Applicant shall obtain a use variance.

- d. §410-20.D.(2).f Solar production systems shall maintain a setback distance of 75 feet from all property lines.

Variance Required – The applicant indicates they will construct roof top solar array, however portions of the building are located less than 75' from property lines. Applicant shall revise plan to depict limits of roof top solar that is outside the setback requirements or amend application to seek approval for a use variance.

- e. §410-20.D.(2).g Solar production system structures, appurtenances and facilities shall not exceed a height of 15 feet above ground level.

Clarification Required – The applicant indicates they are purposing a roof top system on top of building with total height of 43'. The Board shall determine if 15' restriction applies to only ground mount systems. If the requirement applies to roof top applications, the applicant shall amend the application to obtain approval for the variance.

- f. §410-20.D.(2).m Solar production systems and associated equipment which have not been used for commercial production for a period of six consecutive months shall be removed by the property owner. Furthermore, all equipment buildings, related facilities, fencing, utility connections and access driveways utilized for the solar production facility shall be removed and the site restored to its predevelopment condition. Such removal shall be completed within 60 days of the end of such six-month period. All costs associated with removal shall be the exclusive responsibility of the property owner.

Testimony Required – Applicant shall provide testimony to address requirement, Board could consider making requirement a condition of approval.

- g. §410-20.D.(2).n In order to assure compliance with the facility abandonment requirements set forth in Subsection D(2)(m) above, the developer and/or property owner shall provide a performance guaranty satisfactory to the Land Use Board and the Borough Council as sufficient for the reasonably projected costs of removal of the equipment and restoration of the site. Said performance guaranty shall be in an amount equal to 120% of the estimated costs of removal and restoration and shall be subject to the approval of the Borough Engineer. Failure to remove an abandoned solar energy system shall enable to the Borough to remove same at the owner's expense and to assess the property upon which the facilities were located for all reasonable costs and expenses associated therewith, including professional (legal and engineering) services.

Testimony Required – Applicant shall provide testimony to address requirement, Board could consider making requirement a condition of approval.

3. Design Waivers

- a. §315-10.A(1) Preservation of landscape. Landscape shall be preserved in its natural state, insofar as practicable, by minimizing tree and soil removal, and any grade changes shall be in keeping with the general appearance of the neighboring developed areas. Adequate shade trees shall be provided.

Waiver Required – Applicant is seeking variances related to impervious lot coverage relief as such the applicant will need to seek relief from this requirement. Applicant shall provide testimony to address this requirement.

- b. §315-10.A(2) Relation of proposed buildings to environment. The proposed structure shall be related harmoniously to the land form (either natural or man-made) and to existing buildings in the vicinity that have a visual relationship to the proposed buildings. The achievement of such relationship may include the enclosure of space in conjunction with other buildings or other proposed buildings and the creation of focal points with respect to avenues of approach, terrain features or other buildings.

Waiver Required – Applicant is proposing 43' +/- warehouses that will abut residential district and the buildings will be sited at an elevation of 311 finished floor where the residential districts exists about elevation 285, thus the buildings will stand 69 feet above the homes. Due to elevation difference the proposed structures should not be considered to have positive visual

relationship to the existing buildings in the area of the project. The Applicant shall provide testimony to address this comment and address other related comments in our review letter related to this issue.

- c. §315-10.A(3) Drives, parking and circulation. With respect to vehicular and pedestrian circulation, including walkways, interior drives and parking, special attention shall be given to location and number of access points to the public streets, width of interior drives and access points, general interior circulation, separation of vehicular and pedestrian traffic and arrangement of parking areas that are safe and convenient and, insofar as practicable, do not detract from the design of proposed buildings and structures and the neighboring properties. Streets shall be of sufficient width and suitable grade and suitably located to accommodate prospective traffic and to provide access for fire-fighting and emergency equipment to buildings and coordinated so as to compose a convenient system consistent with the circulation element of the Master Plan.

Testimony Required – Applicant shall provide testimony as to the project conformance to this requirement.

- d. §315-10.A(5) Utility service. All electric, telephone, cable television and utility lines shall be underground. Adequate water supply, sewerage facilities and other utilities necessary for essential services to residents and occupants shall be provided.

Temporary Waiver Required – Applicant has not demonstrated adequate utility service for the property, as such a temporary waiver should be considered.

- e. §315-10.A(6) Advertising features. The size, location, lighting and materials of all permanent signs and outdoor advertising structures or features shall not detract from the design of proposed buildings and structures and the surrounding properties.

Testimony Required – Applicant shall provide testimony to address requirement and amend the plans to incorporate description of proposed signage and associated elements. The submitted plans reference installation of building-mounted signs, however details of the building-mounted signs were not provided.

- f. §315-10.B(1)(b) Sight triangles shall be provided at the intersection of all driveways leading to and exiting from the site.

Temporary Waiver Required – Applicant shall revise site plan to include required sight triangles for all driveway/road connections to the public roadway. Per §190-5.D sight triangles shall be established by AASHTO standards.

- g. §315-10.B(2)(a)[1] Site Lighting Levels

Waiver Required – Applicant proposes lighting levels that exceed the average lighting levels per the Borough Table.

- h. §315-10.B(2)(b)[1] Inlets in parking areas shall be spaced and sized to prevent a spread of water into the parking aisles during a storm with an intensity of three inches per hour. Inlets in driveways and roadways within parking areas shall be spaced and sized to provide a minimum of an eight-foot-wide lane for each designed traveled lane during a storm with an intensity of three inches per hour.

Temporary Waiver required – Applicant did not provide analysis to indicate runoff spread would not result in a travel lane of less than 8' wide for all inlets. Gutter spread has not been provided in the Stormwater Management Report for all inlets. The Applicant notes on the plan the site will provide access easement to future residential development to be designed and constructed by others, so the gutter spread requirements if waived could impact more than onsite circulation or emergency vehicle access.

- i. §315-10.B(2)(f)[1] On all sites in excess of 10,000 square feet of building area, fire aisles shall be provided adjacent to all exposures of buildings. No automobile parking shall be permitted between the fire aisle and the building, except that parcel pickup areas will be permitted, provided that the designated area does not exceed 1/3 of the frontage of an individual business establishment. Pedestrian walkways and truck loading zones will be permitted between the fire aisle and the buildings.

Temporary Waiver Required – Applicant proposed access to only portion of the building and grading around the buildings would limit fire access to the exposure. Our office recommends the applicant provides paved fire access around all portions of the buildings and for the Board to obtain input from the Fire Official and Fire Department.

- j. §315-10.B(2)(f)[2] All fire aisles shall be a minimum of 30 feet in width.

Temporary Waiver Required – Access lanes are less than 30' clear width, as such the applicant shall provide the required 30' width fire aisles.

- k. §315-10.B(2)(f)[3] No portion of a structure shall be more than 600 feet from a fire hydrant where public water is available.

Temporary Waiver Required – Applicant shall provide fire hydrant exhibit that demonstrates proper coverage. The Applicant shall also be required to ensure hydrants have adequate flow to support fire operations.

4. Highlands Regional Master Plan Review:

The Borough of Alpha is located wholly within the Planning Area of the Highlands Region and has provided they will conform to the program, adopting a series of documents that promote the objectives of the Highlands Regional Master Plan. The applicant should be aware that any part of the application triggering a NJDEP review would likely also require Highlands review.

VI. Technical Review

1. NJ Transit Review letter

- a. Per NJ Transit comment 4, the site is required to have a 2nd entrance to the site, which per a clarification email provided by NJ Transit is for purposes should the NJ Transit crossing close due to extended NJ Transit activities. The applicant proposes a grasspaver driveway for emergency access, however if there is blockage or extended closure traffic would result using roads that were not intended for trucks or vehicles to exit the site, but intentionally meant for only emergency access. Currently the rail line is not active, the board should consider the developer securing a banked 2nd easement access that, should the rail line be activated, cars and trucks could access Springtown Road, further consideration could be made to make this the grasspaver emergency access and avoid using Seventh Street access.
- b. Alternations to the at grade rail crossing that limit access to the site may require future amended applications to the board as this is the sole access to the site.
- c. Applicant shall provide written letter that NJ Transit will allow for construction of proposed improvements as their comment no. 2 appears restrict excavation.
- d. It is recommend that the Board make a condition of Approval that the applicant must obtain approval from NJ Transit before construction and such agreement is reviewed for impacts to any board approval.
- e. The Borough will need to address long term maintenance and operation and payment to NJ Transit for the land or access to crossing of the at grade crossing to address comments related to long term maintenance and repairs.
- f. Applicant shall provide clarification of NJ Transit No. 9 in writing from NJ Transit with details and revised plan
- g. Rail crossing should have installed crossing barriers should rail be activated.

- h. Applicant shall provide pedestrian access and provisions should rail line become activated.
- i. Applicant shall provide testimony any federal or state permits that may be required for the rail crossing.
- j. Applicant shall provide testimony on impact of NJTransit letter on their design and industrial drive extension.
- k. Applicant will be responsible to address costs associated with revisions to Industrial Drive Roadway extension to address NJTransits letter and agreement.

2. Site Plan Set Review

- a. Cover Sheet – Outside agency approvals such as NJDOT, NJ Transit, Highlands and any other agency that takes interest in the project shall be added to the plan.
- b. Boundary and Topographic Survey – shall provide signed and sealed copy of the reference survey prepared by Maser Consulting.
- c. Boundary and Topographic Survey – shall submit all referenced deeds and/or easements.
- d. Site Plan – Applicant shall extend Seventh Avenue to the terminus point to the Borough Public Right of Way, the Roadway shall be extended to conform to Borough of Alpha road standards to be established by the Borough Engineer. It is suggested that a Developers Agreement be entered that would establish requirements and fair share contributions required for necessary off-tract improvements.
- e. Site Plan – Applicant shall coordinate with Borough to determine emergency access devices to limit traffic. Details of emergency access devices shall be provided and input shall be obtained from police and fire.
- f. Site Plan – prior to construction of guiderails applicant shall provide detailed plans that specify length of end treatment and areas that require additional posts or embedment.
- g. Site Plan – prior to construction of guiderails applicant shall provide engineer’s report that reviews the warrants for each guiderail location.
- h. Site Plan – Retaining walls shall be designed by a NJ PE and include cross sections and stability calculations prior to construction. Several wall areas appear that soil reinforcement may be installed that may conflict proposed improvements or extend beyond property limits. Applicant shall specify

preliminary anticipated limits of soil reinforcement needed. Applicant is responsible to obtain any necessary easements to construct improvements.

- i. Site Plan – Applicant shall depict location of water main extension easement on site plans.
- j. Site Plan – Applicant shall revise future driveway easement to Block 96.10 Lots 5.01-5.22, 5.93, the driveway easement shall not overlap with the circulation for trucks loading dock access. The proposed arrangement will pose hardships in terms of traffic control and driveway turning movements. Applicant shall provide testimony on the layout and future operations of the intersection and intent of access easement (emergency only or unrestricted access easement). The plans appear to have potential for sight triangle distances and driver perception for intersection right of way. The discussion should also address if such crossing location was approved by the railroad operator, it appears consideration would be needed at the intersection in the future for railroad crossing signs and notifications and cross bars that may need additional sight distance an alignment that will not be able to address after building no. 1 and no. 2 is constructed.
- k. Site Plan – Parking Schedule shall be revised to indicate 463 total proposed passenger vehicle spaces instead of 464 and 578 total proposed spaces instead of 579.
- l. Site Plan – Roadway stationing shall be provided to correspond to roadway profile.
- m. Site Plan – Applicant shall provide paved access for emergency vehicles around all sides of building number 1 and number 2. Such access shall not be obstructed by parked vehicles or structures.
- n. Stormwater Management Plan – plan shall be revised to address additional runoff reductions required to be address as part of industrial drive extensions.
- o. Stormwater Management Plan – pipe run D-7 to headwall D-1 shall be revised to reduce disturbance as there is insufficient area to construct portions of pipe run without encroaching to NJDOT Property and no easement provided, further the pipe run volume is not reduced or include water quality improvements. Portions of this drainage area are from areas to be disturbed by the site and offsite, as such are required to be addressed.
- p. Stormwater Management Plan – portions of pipe runs will require additional backfill over pipe during construction, Applicant shall provide construction note to advise contractor on minimum cover required before construction loads can be driven over pipe, as asphalt will likely not be installed prior to construction loads over pipe. Structural Fill Materials and Compaction Testing Note #8 which directs the contractor to follow manufacturer’s recommendations for pipe and basin cover prior to placing construction equipment over does not suffice. Actual minimum cover depth for each pipe shall be noted.

- q. Stormwater Management Plan – all inlets shall have filter devices installed and truck loading areas shall have oil absorbent socks installed as part of the filter.
 - r. Stormwater Management Plan – Proposed Detention Basin SWM-3 is labeled SWM-2B and should be revised to indicate SWM-3.
 - s. Stormwater Management Plan – The invert out of OCS C-6 should be revised to 300.00 to be consistent with the Stormwater Management Report and to be at the orifice elevation.
 - t. Stormwater Management Plan – The size and elevation of all outlet controls for OCS B-4 and C-6 shall be consistent between the plan, Outlet Structure Detail and Pond Reports in the Stormwater Management Report.
 - u. Stormwater Management Plan – The invert out of proposed E-Inlet D-7 shall be consistent between the plan and Pond Report No. 8 in the Stormwater Management Report.
 - v. Stormwater Management Plan – The Outlet Structure for SWM-2A shall be shown on the plan and the label shall include the elevations for the rim, weirs, orifice and invert out.
 - w. Stormwater Management Plan – The downstream invert elevations of all pipes entering SWM-2A shall be added to the plan.
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- x. Stormwater Management Plan – The upstream and downstream invert elevations of the 16 LF 24” HDPE exiting WQS-2 shall be added to the plan.
 - y. Stormwater Management Plan – Inlet A-77 shall be revised so that the invert elevation out is lower than the invert elevation in.
 - z. Stormwater Management Plan – The HDPE between Inlets A-65 and A-66 shall be increased in diameter to be equal to or greater than the diameter of the upstream pipe. Currently, the diameter is 15” while the diameter of the upstream pipe is 15”.
 - aa. Stormwater Management Plan – The length, size, type and slope of the pipe between Manholes C-4 and C-3 shall be added to the plan.
 - bb. Stormwater Management Plan – The scale of Inset A shall be noted as 1” = 50’.
 - cc. Stormwater Management Plan – Detention basins and a drainage swale are proposed in Karst underlying areas without the required mitigation measures. Mitigation measures in accordance with the *Standards for Soil Erosion and Sediment Control in New Jersey: Investigation, Design and Remedial Measures for Areas Underlain by Cavernous Limestone* shall be provided.

- dd. Applicant shall provide testimony to address the impact of the basin overtopping and impacting residents down slope of basins.
- ee. Utilities – Water service lines shall comply with §403-23 as such the plan does not indicate type or size.
- ff. Utilities – Water Main extension to service the site shall be done in conformance of §403-29 and cost of extension shall be bore by applicant. It shall be noted in the resolution that the cost is not to be bored by the Borough or Borough Water Authority.
- gg. Profiles – Profiles shall be provided for all proposed sanitary sewers including the proposed force main and for all proposed storm sewers and basins.
- hh. Profiled – Roadway Profile – the 18” HDPE between Inlets A-81 and A-79 shall be added to the profile.
- ii. Profiles – Seventh Ave Sanitary Profile – shall label invert of 15” HDPE pipe crossing and clearance between stormwater pipe and sanitary sewer pipe.
- jj. Profiles – Seventh Ave Sanitary Profile – Manhole diameters shall be labeled on each profile.
- kk. Profiles – Seventh Ave Sanitary Profile – inside drop structures shall be noted, all inverts more than 2’ from invert out shall include an inside drop.
- ll. Landscape Plan – all open lawn areas and slopes not adjacent to parking are building shall be reforested planted with varying height plantings to establish habitat areas.
- mm. Landscape Plan - shall include note that the Borough of Alpha reserves the right to require additional landscaping, screening including berm or fencing prior to issuance of certificate occupancy and throughout the construction process.
- nn. Landscape Plan – shall be revised to include onsite buffering and screening to shield buildings along the rail road right of way; the proposed plan relies on offsite landscaping to screen properties from future residential development and existing adjacent recreation/educational uses.
- oo. Landscape Plan –the building is at an elevation of 311’ for finished floor where the residential district exists at about elevation 285’, thus the buildings will stand 69 feet above the homes. Applicant shall provide testimony as to the impact of view shed and transition proposed plantings will provide at time of planting and till they are mature. Additional comments on plant spacing, plant material and minimum planting heights will be provide after applicant provides testimony.

- pp. Lighting Plan – Applicant shall screen fixtures from residential areas so the light fixtures are not visible from residential properties. Applicant may have to reduce fixture height to achieve.
 - qq. Lighting Plan – Applicant shall revise lighting table to provide separate lighting levels for sidewalks and intersections.
 - rr. Soil Erosion and Sediment Control Details – shall include detail for sediment basin including summary of supporting calculations.
 - ss. Construction Details – revised concrete to be minimum 4,500 PSI air entrained for all concrete onsite. Concrete curbs and sidewalks shall be sealed at time of installation.
 - tt. Construction Details – HDPE Trench Detail indicate minimum pipe bedding of 4” thick bedding material.
 - uu. Construction Details – A detail shall be provided for each type of pipe or conduit proposed on site.
 - vv. Construction Details – A detail for all utility pipe crossings and minimum separation for pipes shall be provided and a detail for when separation is not achieved.
 - ww. Construction Details – Applicant shall revise thrust block details to indicate conditions when thrust blocks shall be provided.
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- xx. Construction Details – All water carrying pipes shall include water tight connections at both structure and pipe joints.
 - yy. Construction Details – Outlet Structure Detail Table should be revised to indicate 15” for the size of the outlet for B-4 to be consistent with the and Stormwater Management Plans and Report. 18” is currently indicated.
 - zz. Construction Details – Outlet Control Detail shall be revised so that the size and elevation of each outlet control of OCS B-4 and C-6 is consistent with the Stormwater Management Plan and Pond Reports in the Stormwater Management Report.
 - aaa. Construction Details – Provide details for the proposed swale and all proposed detention basins in accordance with the NJDEP BMP Manual and the Standards for Soil Erosion and Sediment Control in New Jersey in relation to Karst Topography.
 - bbb. Construction Details – The manufactured treatment device detail should specify an Up-Flo Filter Extended Maintenance Cartridge (EMC) as indicated in the Stormwater Management Report.

- ccc. Construction Details – A detail for the Downstream Defender by Hydro manufactured treatment device, indicated in the Stormwater Management Report, shall be provided.
3. Industrial Road Connection Plan
- a. Plan that was submitted during preliminary site plan approval should be submitted and revised per the comments below.
 - b. Applicant shall be responsible to resurface Industrial Drive curb to curb should the Borough install asphalt surface course and the contractor excavates within the roadway for the duration of excavations completed by the applicant or utility extensions to service the site.
 - c. Applicant shall revise plan to include north arrow.
 - d. Applicant shall revise plan to make roadway name labels clear to read.
4. Stormwater Management Report
- a. Additional comments will be provided based on revisions requested in this review that could impact site layout and basin locations.
 - b. Section 1.2 shall be revised to acknowledge Borough Stormwater Code section §340.
 - c. Section 2.3 shall reference the geotechnical report to support Karst conditions and shall reference stormwater regulation conditions that would enable eliminating recharge based on karst conditions. In addition, the geotechnical report shall be provided.
 - d. Storm Sewer Sizing Calculations should be revised to include gutter spread for all inlets to demonstrate that runoff spread would not result in a travel lane of less than 8' wide for all inlets.
 - e. Applicant shall complete and submit NJDEP low impact development checklist.
 - f. Applicant shall revise report to provide NJDEP certification for all MTDs.
 - g. Applicant shall revise report to demonstrate points of site discharge have capacity to support proposed stormwater runoff rates.
 - h. Applicant shall revise report to indicate sub watershed size and location of the site within the watershed.
 - i. Borough of Alpha code requires the size of the nearest culvert or bridge downstream of the discharge area, and profiles of cross sections of the stream channel upstream of that structure if within 500 feet of the tract.

- j. Borough of Alpha code requires a schedule of the sequence of installation of the stormwater management plan, related to the starting and completion dates of the project.
- k. Applicant shall revise the report to include an analysis of stormwater runoff rates for the 1, 2, 10, 25 and 100 year stormwater events as the Borough Code requires.
- l. The Applicant did not provide sufficient information on the watershed and sub watershed which the site discharges and notes that they are shifting flows between existing drainage areas on site under proposed conditions.
- m. Appendix C: Curve Number Worksheets – The pre-developed land cover must be assumed to be in good hydrologic condition for all land covers.
- n. The total area and pervious area of EXDA-3 are inconsistent between the Curve Number Calculations and Existing Drainage Plan.
- o. The times of concentration of EXDA-1, EXDA-2 and EXDA-3 shall be consistent between the Time of Concentration Calculations, Existing Drainage Plan and Hydrographs.
- p. The total precipitation utilized in the runoff hydrographs shall be from the New Jersey 24 Hour Rainfall Frequency Data which indicates 2.78, 3.34, 4.89, 5.93 and 7.82 inches for the 1, 2, 10, 25 and 100 year stormwater events, respectively.
- q. The Time of Concentration Calculations for PRDA-3, pervious and impervious, shall be provided and the times calculated shall be utilized in the respective hydrographs. It should be noted that Time of Concentration Calculations for all other proposed drainage areas have been provided; however, 6 minutes was conservatively utilized in the hydrographs which is acceptable.
- r. The CN for PRDA-2B (pervious) on the Proposed Drainage Plan should be revised to 77 as indicated in the Time of Concentration Calculations and Hydrographs.
- s. The pervious area of PRDA-2C shall be consistent between the Curve Number Calculations, Proposed Drainage Area Plan and Hydrographs.
- t. The reach length and channel slope of Hydrograph No. 45 shall be revised to be consistent with the Stormwater Management Plan.
- u. Runoff Comparison Table 1 shall be revised to indicate the proposed peak runoff for each storm consistent with the hydrographs.

- v. Demonstrate that the lowest elevation of each proposed detention basin and the proposed swale is at least 1 foot above the seasonal high groundwater table.
- w. The peak flow of the Water Quality Design Storm required to be treated by the Up-Flo Filter EMC (WQS-2) exceeds the maximum water quality treatment flow rate for that device. An MTD that can handle the required peak flow rate to be treated (3.389 cfs as indicated by Hydrograph No. 34 of Appendix G) shall be provided to achieve the required 80% TSS removal rate.
- x. The gutter spread of Inlet A-86 results in a travel lane of less than 8' wide during a storm event with a rainfall intensity of 3 inches per hour. The storm sewers shall be revised to decrease this gutter spread.
- y. The length and slope of the 36" dia. HDPE between Manholes A-16 and A-17 shall be consistent between the Storm Sewer Sizing Calculations and the Stormwater Management Plan.
- z. The grate/rim elevations of all structures shall be consistent between the Storm Sewer Sizing Calculations and the Stormwater Management Plans.
- aa. The storm sewers shall be revised so that the Hydraulic Grade Line elevation of each structure is below the respective grate/rim elevation so that stormwater does not overflow the top of the structure during the 25-year storm event.
- bb. Demonstrate that all proposed detention basins will fully drain within 72 hours.
- cc. Scour hole calculations shall be provided for the scour hole at proposed headwall A-62.
- dd. Applicant references structural supports are required for stormwater structures but does not detail them on the plans please provided testimony.
- ee. Groundwater recharge shall cite NJDEP section that provides relief and document any required proofs for relief within this section (2.3).
- ff. Applicant shall clarify section 2.4, as there appears to be limited efforts to include non-structural strategies or green infrastructure into the project. The applicant shall review NJDEP strategies and explain in detail why/how they conform and why/how they couldn't conform.
- gg. Hydraulic analysis shall be expanded to show capacity downstream of site discharge points and routing calculations must be revised to indicate the same structure on the plan and the routing map, there concern for downstream pipe capacity. The Applicant must further model for routing all flow into pipe downstream they are proposing to connect to for each design storm event.

- hh. Drainage area plans were omitted from Electronic submission to engineer and will require further review.
5. Stormwater Operation and Maintenance Manual
- a. Applicant shall provide a final Stormwater Operation and Maintenance Manual which conforms to NJDEP requirements/recommendations. Our office will provide additional review comments on stormwater O&M upon submittal.
 - b. A Deed notice will be required to address NJDEP Stormwater Operation and Maintenance requirements.
6. Traffic Review
- a. Applicant shall submit a signed and sealed traffic impact study.
 - b. Applicant shall provide supporting numerical data to establish local peak hour for the study, the report makes statements that a limited turning count was utilized to establish peak hour traffic.
 - c. Traffic impact report shall be expanded to include traffic circulation at the intersection of Route 22 and Route 122.
 - ~~d. Applicant shall revise report to justify proposed ITE LU 150 code vs other ITE LU related to warehouse or similar uses.~~
 - e. The Applicant shall revise the report include projects that are already approved were not in operation at time of traffic count.
 - f. The applicant shall revise the report to address pedestrian access to the site.
 - g. Applicant shall provide a summary table that lists each turn movement and provides the level of service for each movement for existing, future no build and future build.
 - h. Applicant shall provide testimony to justify build out period utilized from the report.
 - i. Applicant shall discuss queuing of vehicles at intersection of Route 122 and Industrial drive.
 - j. Applicant shall include traffic circulation figures.
 - k. Applicant shall revise report to indicate total daily number trips per vehicle type weekday and weekday on 24 basis broken-down by vehicle classification type.

- l. Applicant shall provide review of proposed driveway easement to adjacent lots.
 - m. Applicant shall provide testimony for accessing the site from Route 122, Route 22 and Route 78 due existing congestion and limited queueing at jughandle and how wayfinding will be address from Route 78 and Route 22.
 - n. Applicant shall obtain approval to weight restrict all surrounding public roads in Alpha due and post signage due to errant trucks that attempt to enter the site through adjacent local roads due likely conflicts with GPS and navigation aids.
 - o. Applicant shall make improvements to Route 122 and Route 22 intersection as requested by NJDOT and Warren County and Township of Pohatcong.
 - p. Applicant shall signal warrant analysis at intersection of Route 122 and Industrial Blvd. and Edge road Route 122.
 - q. Applicants shall amend report to address concerns raised by Warren County Transportation study that truck traffic will pose in this area and the Applicant will offset or address those items.
 - r. Applicant shall be responsible to address updates to navigational mapping prior to occupancy to reduce errant truck vehicles.
 - s. Applicant shall post variable message signs as directed by the Borough prior to occupancy to reduce errant vehicles for a duration to be established by the Borough.
7. Environmental Impact Statement
- a. Applicant shall expand air quality discussion to address how industrial warehouse will have minimal impact and further quantify impact based on state or federal standards.
 - b. Applicant shall address how noise will be mitigated from industrial/warehouse activities such as limiting hours of operation or other treatments to limit impact to adjacent residential district. The proposed landscape buffers are not sufficient due to topography of the site.
8. General Comments
- a. Applicant shall comply with required COAH requirements to be established by the Borough.

- b. Construction will occur in close proximity of Railroad right of way as such Site Plan shall include contact information for railroad operator, additional insurance requirements that are required for the work near railroad right of ways, required safety training and any other requirements of NJDOT Railroad Engineering Services Unit.
 - c. Applicant shall provide approval from NJ Transit Corporation for an access easement across their property noted as Block 300 Lot 1.
 - d. All site improvements shall meet NJDOT standards and requirements.
 - e. Traffic Control plans shall be provided.
 - f. Applicant shall provide prior to construction a copy all site improvement specifications or documents provided to contractor to the Borough for review for conflicts approved site improvements.
 - g. Applicant per §54-13.2 shall be responsible to pay for any Tax Map of GIS database update fees to be determined by the Borough Engineer.
 - h. Applicant shall provide electronic copy of all application documents and referenced documents whether application is approved or denied.
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- i. Applicant will be responsible to resurface Seventh Avenue and Fifth Avenue curb to curb from dead end to limits of excavations into the intersection of Vulcanite Avenue.
 - j. Applicant shall request Title 39 enforcement on site.
 - k. Applicant shall number buildings as required by §276.
9. Phase 1 Environmental Site Assessment and Preliminary Assessment Report
- a. Report that was submitted under preliminary site plan approval should be submitted. Applicant shall provide testimony at time of hearing to address comment.



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Alpha Commerce Center
Our Project #3202.037
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We reserve the right to make additional comments as new information becomes available and is preliminary as additional submissions and testimony are required to complete our review.

Very truly yours,
Van Cleef Engineering Associates

s/ *Stanley J. Schrek*

Stanley J. Schrek, PE, AIA, PP, CME, LEED AP
Land Use Board Engineer

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