



**ENVIRONMENTAL COMMISSION
GREEN TEAM
900 CLIFTON AVE., CLIFTON, NJ 07013
SECRETARY (973) 470-5770**



March 16, 2021

Board of Adjustment
City of Clifton
900 Clifton Avenue
Clifton, NJ 07013

Dear Members of the Board of Adjustment:

The Environmental Commission received and reviewed the Environmental Impact Statement (EIS) for **Valley Regency of Clifton, 1129 Valley Rd., Clifton**. Please see the attached comments from the Commissioners.

If you have any questions, please let Victoria Kaufman via email at vkaufman@cliftonnj.org or by phone at (973) 470-5770.

Sincerely,


Stephen Shukaitis
Environmental Commission President

Valley Regency

1. The EIS states the Third River is 300 feet from the site but does not address how runoff from the development will affect the waterway. The applicant should explain stormwater flow in the vicinity of the site and how the Third River could be affected. Controls to protect the waterway during construction should also be implemented.
2. The stormwater management plan provided does not conform to the new New Jersey stormwater management rules requiring green infrastructure. These rules are reflected in Clifton's newly adopted ordinance effective 3/2/21. The applicant should provide an explanation and/or justification for this discrepancy.
3. The applicant should also indicate the caliper of trees that are to be removed and address how the removal of mature trees will affect stormwater absorption at the site.
4. A tree replacement schedule (species, number, locations on the site) should be provided and should conform to Clifton's Tree Protection Ordinance Section 433-37.
5. The new location of the hotel shifts the potential for noise concerns to a different portion of the site. These noise concerns should be addressed. Also, any reduction in noise control by the removal of trees should be addressed.
6. The current EIS does not reflect how the new site design will affect traffic on Valley Road.
7. There were multiple references in the EIS to the development having little impact because the site is already heavily developed. However it is clear that a portion of this site is undeveloped. The EIS has stated there would be an .83 acre increase in impervious surfaces. Has this figure changed at all with the revised plan?
8. The EIS states that "The site and immediate surroundings are heavily developed and would not make likely habitat for wildlife." Will the hotel (in the new location) be built on previously undeveloped land? Was a wildlife survey conducted at the site? Being in close proximity of Garret Mountain, any wooded areas of the site are likely used by migratory songbirds, many of whose numbers are in decline.
9. Trees - There has been no clear indication of how many trees (and of what size) are being removed. How many trees are being removed with the new revised plan and how is this being mitigated?
10. There is a reference to the eastern portion of the site as steeply sloping land. Does the revised plan include disturbance of the steep slope area? And if so, how will it be protected?
11. Water Quality - Although not within the riparian zone, any runoff (lawn chemicals, pesticides, organic waste etc.) from the site would drain into the Third River, impacting fish and wildlife at the Alonzo Bonsal Wildlife Preserve and other sites downstream. (This question still remains to be addressed)
12. Air Quality - It says air quality is not expected to "significantly degrade." That would indicate some degradation of air quality is expected. This should be explained in detail and how this might affect nearby residents. This question also still remains to be addressed. Will this differ at all with the revised plan?

13. Noise - The EIS states that since the site is already developed, noise levels are not expected to be a nuisance. How will this differ with the revised plan?\
14. If the new site plan proposes a greater than 0.25 acres of net new impervious surface area, it would be under the jurisdiction of the NJ Stormwater Management Rules. Although not within a State "regulated area" like a flood hazard area, the site plan should still show compliance under the City of Clifton Stormwater Management Ordinance. Neglia Engineering should confirm this in their review. How effective will the proposed dry wells be for groundwater recharge? This may also be a good location for a rain garden for water quality.