

RULS-AD - 1984 - 545

11-5-84

Land Development Ordinance Review

60 pgs.

RECAL-Systems, N. A.

PLAINTIFF'S
EXHIBIT

PD-2 *encl*

11/5/84 *EBJ*

RULS-AD-
1984-545

I. LAND DEVELOPMENT ORDINANCE REVIEW

The Mount Laurel II compliance requires that each township remove excessive restrictions and exactions which would preclude actual construction of its fair share of low and moderate income housing.

The inability of the proposed ordinance (June 1984 conveyed July 6, 1984 to produce the required low and moderate units is critiqued in the Site Suitability section of this report. This section of the report addresses the numerous other excessive requirements within the ordinance which add cost and additional hurdles to the construction of low and moderate income units. The ordinance reviewed is dated August 18, 1980 with amendments through January 19, 1981 and the amendments adopted December 19, 1983. By raising these issues to the attention of the court, we do not wish to convey the impression that these restrictions must be changed prior to development on the Dobbs site. Wallace Roberts & Todd, one of the foremost land planning firms in the country, is noted for design which is sensitive to the natural environment. Our staff of planners, landscape architects and architects work in teams to generate environmentally compatible and architecturally pleasing residential developments. The firm is committed to making Mt. Laurel II housing acceptable and will include as many design features as is practical to make the development marketable as well as financially feasible.

The requirements within the ordinance which are overly restrictive and/or cost inducing are as follows:

Section 13-201 Definitions

Townhouse - requires that each unit within the 3 unit module have distinct design features such as width, setback, roof design, color, or exterior materials.

Such design distinctions and limitation on layout add cost to construction. The variation in design features increases the number of units which must be designed, thus increases the developer's cost. Allowing standardized features would reduce costs.

Parking Space - 10 feet by 18 feet, exclusive of driveways.

The standard for a large car is 9 feet by 18 feet, however, many communities are allowing some percentage of smaller spaces reflecting the reality of an increased percentage of smaller cars. In a January 1983 Urban Land Institute article, New Jersey was cited as having 30.3% small cars. Reducing the size of each space reduces the area and expense of paved off street lots.

Day care or nursery schools - There is no zoning category that allows any form of day care center or nursery school. Given the likelihood of two income families, and the necessity of child care for a single parent household, the omission of this land use requires that parents transport children to other communities.

13-406.4(4) - Office Research

This requirement allows additional square footage in the OR Zone in exchange for between 4 and 6 acres of land to be devoted to "public purpose uses." This zoning is applied to

only one proposed site. The "public purpose" for which this land is to be used is stated as low and moderate income housing in the footnote to the development site table, but because this is not specified in the ordinance, it could be used for municipal facilities or any other public use.

The linkage between office or commercial development and low and moderate income housing is a connection we support and recommended in our earlier proposals. It enables a subsidy (in the form of land or funding) of low and moderate income housing without the strain on services generated by market rate residential development.

13-506 - Natural Features

c. Minimum of 8, 2 inch caliper trees per acre for each lot or tract.

Given the wooded nature of the entire area, and the expense (\$250-300 per tree) of planting additional trees, this requirement seems excessive.

13.508 - Off street parking, loading areas and driveways.

1.a. Landscaping

A four foot screen planting, berm, fence, wall or combination thereof must be provided between off street parking areas and lot lines or street lines for garden apartments.

Despite the fact that townhouses, two family units and semi-detached units also require off street parking, only garden apartments must screen the parking from view, adding expense to the least cost unit type.

13-508.1.c

For every off street parking area, the equivalent of one space in 30 must be devoted to landscaping, specifically 90 feet (1/2 of 10'x18' space) must be shrubs and 90 feet having trees with branches no lower than seven feet.

While landscaping parking areas is desirable, the requirement of "trees" (no specification of how many) with branches no lower than seven feet means each tree must be roughly 14-16 feet tall (a 4 inch caliper tree) which would cost \$600-700 each installed. As garden apartments again are the housing type most likely to generate a 30+ car parking area, this requirement would most likely apply only to that housing type.

13-508.3.d

All parking and loading areas and access drives serving non-residential and multi-family developments shall be curbed throughout. Curbing within other developments shall be installed at intersections, in locations of high storm water velocity, and or streets or other areas where on-street parking is permitted or likely to occur.

This curbing requirement throughout multi-family developments as opposed to only limited areas in other developments is another excessive cost.

13-508.6.c

Parking spaces 10 feet by 18 feet. As aforementioned, the single parking space size ignores the reality of smaller cars and possible parking area reduction which would reduce paving cost and concomitant water retention facility cost.

13-513.3 Sidewalks and Aprons

- a. Sidewalks and aprons can be required at the Board's discretion, depending on probable pedestrian volume, development's location, relation to populated areas and general type of development.
- b. Sidewalks are required to be four feet wide and have concrete six inches thick.

While not specifically stated, multi-family, high density housing would presumably be required to provide sidewalks. Four inch thick concrete (which was the previous Bedminster requirement) is the standard depth for sidewalks. Alternate paving surfaces are normally cheaper than concrete, and could enhance Bedminster's rural image a more than concrete.

Section 13-601.2 - Senior Citizen Housing

13-601.2.a.

No site less than four acres.

This is an unnecessary constraint. There should be no acreage limit for senior citizen housing. This requirement combined with the maximum density of 15 dwelling units per gross acre means that all senior housing would have at least 60 units, if developed at the highest density.

13-601.2.e.

Maximum building height 35 feet and three stories. This requirement reduces the previous height limit of 60 feet and six stories (13-601.2.C, page 1371 of 8/18/80 Land Development Ordinance). Given the fact that nearly all senior housing complexes have elevators for any multi-story structure, more land could be saved for open space and more units could be accommodated economically if higher height limits were allowed.

13-601.2.h.1

Verification of utility and support services including transportation facilities and commercial establishments within one mile.

While all of the proposed senior citizen sites are within a mile of the two small convenience shopping areas in Bedminster, this requirement unnecessarily limits sites for senior citizen housing. Shuttle buses can easily provide transportation if other sites are developed. The requirement for "transportation facilities" presumably only refers to roadways, since no public transportation is available in Bedminster.

13-601.2.h.4

Requires non profit organization to develop Senior Housing. While it is likely that low and moderate senior housing will be developed by a non-profit organization, the ordinance should not eliminate the possibility of other developers building this type of housing.

13-601.2.h.5

Requires assurance that all (senior citizen) low and moderate income units built will continue to be occupied by low and moderate income persons for 30 years.

The "assurance" the city requires is not specified here, however, they would presumably be the same as subsection 13-606, see comments under that section.

13-601.3.i - Low and Moderate Income Housing

Requires a narrative description of the mechanism with samples of language to be included in the covenants and description of the entity or entities responsible for monitoring occupancy, controlling resales and rentals, applicant screening, etc.

This requirement - the responsibility of administration of low and moderate income housing over a period of 30 years is inappropriate for each developer. It is inefficient to have several developers all performing the same functions, especially applicant screening which would more efficiently be handled by a single entity to create a single waiting list for the township. The township will still be responsible to the court and/or the State to establish its Mt. Laurel com-

pliance and will thus have to gather this information from multiple developers rather than a single non-profit or governmental entity. This requirement places an unknown financial burden on developers which further discourages the development of low and moderate income housing.

The requirement that developers perform these monitoring and administrative functions over a period of 30 years is unrealistic and is another disincentive to develop. This on-going responsibility should belong to an entity which cannot go out of business, such as the township or to a non-profit entity which has flexibility as to sources of funding, and thus increased likelihood of continued existence.

13-603 Garden Apartments

13-603.c.

In addition to any interior storage space, each unit must have individually lockable 250 cubic feet of storage space in a convenient, centrally located in the cellar, basement, or ground floor of the building.

This requirement adds excessive cost to the construction of a garden apartment and is in no way required to protect the health, safety or welfare of its residents.

13-603.d.

No outside area or equipment shall be provided for the hanging of laundry or the outside airing of laundry in any manner. Sufficient area and equipment shall be made available within each building for the laundering and artificial drying of laundry of occupants of each building.

Requiring washers and dryers in each building is an obvious cost inducing factor, inevitably borne by the residents. Requiring laundry facilities in each building further eliminates the possibility of a more efficient laundromat serving more units, or an off site commercial facility.

13-603.e.

Each apartment building shall contain a single master TV antenna system which shall serve all dwelling units within the building.

TV's are certainly a normal fixture in most homes, but the requirement of a master TV antenna system again has nothing to do with a resident's health, safety and welfare.

13-604 - Townhouses

13-604.a.

Each building and complex of buildings shall have a compatible architectural theme with appropriate variations in design to provide attractiveness to the development. Such variations in design shall result from the use of landscaping and the orientation of buildings to the natural features of the site and to other buildings as well as from varying unit widths, using different exterior materials, changing roof lines and roof designs, varying building heights, and changing window types, shutters, doors, porches and exterior colors. In no event shall more than two adjacent dwelling units in any one building have the same setback.

7. Flood Fringe Area: The portion of the flood hazard area outside the floodway.

8. Flood Hazard Area: Land in the flood plain subject to a one percent (1%) or greater chance of flood in any given year.

Definition #8 refers to the 100 year flood plain, thus the flood fringe area (#7) refers to the area between the floodway and the 100 year flood plain limit. (Floodway is the actual river or water course itself). The definitions go on to refer to both the New Jersey Floodway Design Flood (the 100 year flood plain) and the New Jersey Flood Hazard Design Area, which is the DEP, 100 year plus 25% area. The "Critical Area" definition refers to the DEP, 100 year plus 25% area.

13-605.2.d. - Uses in Floodways and Flood Fringe Areas

The term "flood fringe area" as per Bedminster's definitions refers only to the 100 year flood plain.¹ Despite these definitions, Mr. Coppola has used the 500 year flood plain to determine critical areas in his most recent June 1984 (submitted 7/6/84) Mount Laurel II compliance report. The use of the 500 year flood plain is excessive and inconsistent with the flood fringe definition as adopted.

¹Confirmed by Mr. Hugh Docherty of FEMA who reviewed Bedminster's flood control ordinance. Telephone communication 8/23/84.

13-606.1.e - Single Family Clusters (proposed 7/6/84
ordinance amendment)

Allows single family clusters on parcels fifty acres in area or greater, at a density of 1 du acre, plus 1/5 du per "critical acre" (critical in terms of slope or flood plain). This adds another category of Optional Development Alternatives.

The new zoning category allows only detached dwelling units, and a minimum lot size of 14,500 square feet and a maximum of 33,000 square feet with an average of no less than 22,000 square feet. There is no provision within this zone for twins, duplexes, townhouses, or garden apartments, and no requirement for low and moderate income units. This zone does nothing to create a realistic opportunity for low and moderate income units, thus its inclusion in the compliance report is questionable.

13-606.3. - Planned Residential Developments

13-606-3.i. - Low and moderate income housing requirements

There are several provisions within this requirement which discourage developers from building low and moderate income units.

The developer must provide the mechanism and the assurance that built units will be sold or rented to low and moderate income households and that they will continue to be occupied by low and moderate income persons for 30 years.

The long term commitment to a project which has so many financial unknowns is a great disincentive to developers. As aforementioned under section 13.601.3.i., the distribution of monitoring and administrative duties to each developer requires that the township monitor each developer to insure compliance over the same 30 years. There is no mechanism included in the ordinance for the developers to report back to the Township in future years, nor any penalty or remedial action included which would rectify a non-compliance situation.

The Township also requires in this subsection that housing be affordable to a "reasonable cross-section of households within each (low and moderate income) category."

While this is certainly desirable, the only current developers, The Hills, have been unable to meet this requirement (granted it was not a requirement at the time they got their approval). The Township has done nothing to assist either the developers or potential low and moderate income persons financially which is certainly within their power. Financial assistance in the form of reduced fees, (offered in the compliance agreement of July 6, 1984, but not in the proposed ordinance), reduced or postponed taxes, low interest loans, application for State and Federal funds, or subsidy of a private non profit organization administer the housing program and to monitor compliance could all facilitate the construction of low and moderate income units.

13-606.3.1.1.

25% of the 20% low and moderate income units shall be subsidized rental units. If no subsidies are available, they shall be no larger than 15% above HUD minimum size requirements. The developer shall insure that 50% of rental units

will be for low income households, and 50% for moderate income households. Not less than 20% of the units shall have three bedrooms.

This level of specificity leaves little room for variation, and will force most developers into prolonged approval processes as they attempt to get waivers for something as minor as the percentage of 3 bedroom units. The requirement for any specific percentage of unit sizes (number of bedrooms) has never been substantiated by any background research as to the actual demand for specific unit types or sizes and unnecessarily restricts a developers financing options. While a variety of unit sizes is desirable, the level of specificity here is unwarranted given the unknowns in the market.

13-606.3.i.2.

25% of 20% low and moderate income units for sale, 50% low, 50% moderate income, 20% 3 bedroom units.

See note under 13-606.3.i.1

13-606.3.i.3

The Planning Board may waive mix requirements, "subject to such appropriate conditions as it may impose"...

This subsection enables the flexibility needed to balance the requirements in the above sections, but leaves open the question as to what proofs would be required, or what other exactions could be made, again leaving the developer open to a lengthy waiver and approval process.

13-606.3.i.4

Requires that if a developer wishes the Township to waive a requirement, the developer must select and pay a housing expert from a list of three prepared by the Planning Board.

The housing expert may, also at the developer's expense, hire accountants, economists or other professionals. This subsection requires disclosure of the developer's financial records in order to determine the financial feasibility of developing under the existing or proposed waived requirements. The housing expert is to prepare a report on the proposed waiver of requirements, however, the recommendations are not binding on the Township or Planning Board. Should the Township or Planning Board not accept one or more of the requirements, they must specify their reasons in writing.

This requirement again places an additional financial and time burden on the developer with no assurance that any of the arguments for a waiver would be accepted.

There is no stipulation within this subsection for a time limit on the expert's report, nor cap to expenses.

The issue of acceptable levels of profit for building low and moderate income units have not been resolved. Mt. Laurel II states (footnote 37, pg. 129) that a mix of upper and middle as well as low and moderate income units is necessary to render the project profitable and thus insure the builder's incentive. In the current situation of few if any public subsidies, it is incumbent on the Township to insure developer profitability and therefore interest.

13-704.j. - Compensation of experts (12/19/83 amendment)

The Planning Board may employ or contract for and fix the compensation of such experts and other staff and services as it may deem necessary.

This subsection, if applied to the housing experts that developers are required to use (13-606.3.i.4) to get waivers would mean the Township could also dictate the compensation rate of these experts which the developers must pay.

There are no objections to reasonable fees, however the fees must be applied to both developers and township experts equally.

II. SITE SUITABILITY

This section of the report details the reasons that the sites identified in Mr. Coppola's June 1984 Compliance Report do not represent a "realistic opportunity" for Bedminster's Fair Share low and moderate income housing units to be built. The three major issues within this section are the potential number of units, the traffic and access difficulties of the selected sites, and the sewer capacity problems of the identified sites. In addition, within the detailed site analysis subsection, other difficulties of site development are discussed.

Bedminster is relying on private developers to internally subsidize low and moderate income units within mixed income developments. There are several site related factors which add to the development costs of each site: the availability of, or distance to existing utilities, the presence or absence of steep slopes, the limitations of the soil types found on each site, the depth of water table, depth to bedrock, and amount of clearing required.

Potential Units

Bedminster's fair share of low and moderate income units, according to the "consensus planners" methodology is 819 units, a figure earlier stipulated in these proceedings. The maximum potential fair share units that could be produced

¹Coppola, Richard T. and Associates, "Bedminster Township, Somerset Company, New Jersey, Meeting its 'Mt. Laurel II' Housing Obligations," June 1984, submitted to the court July 6, 1984.

under Mr. Coppola's Mt. laurel II compliance proposal of June, 1984 is 900 units. This figure was calculated based on the multiplication of developable acres by maximum zoning density.

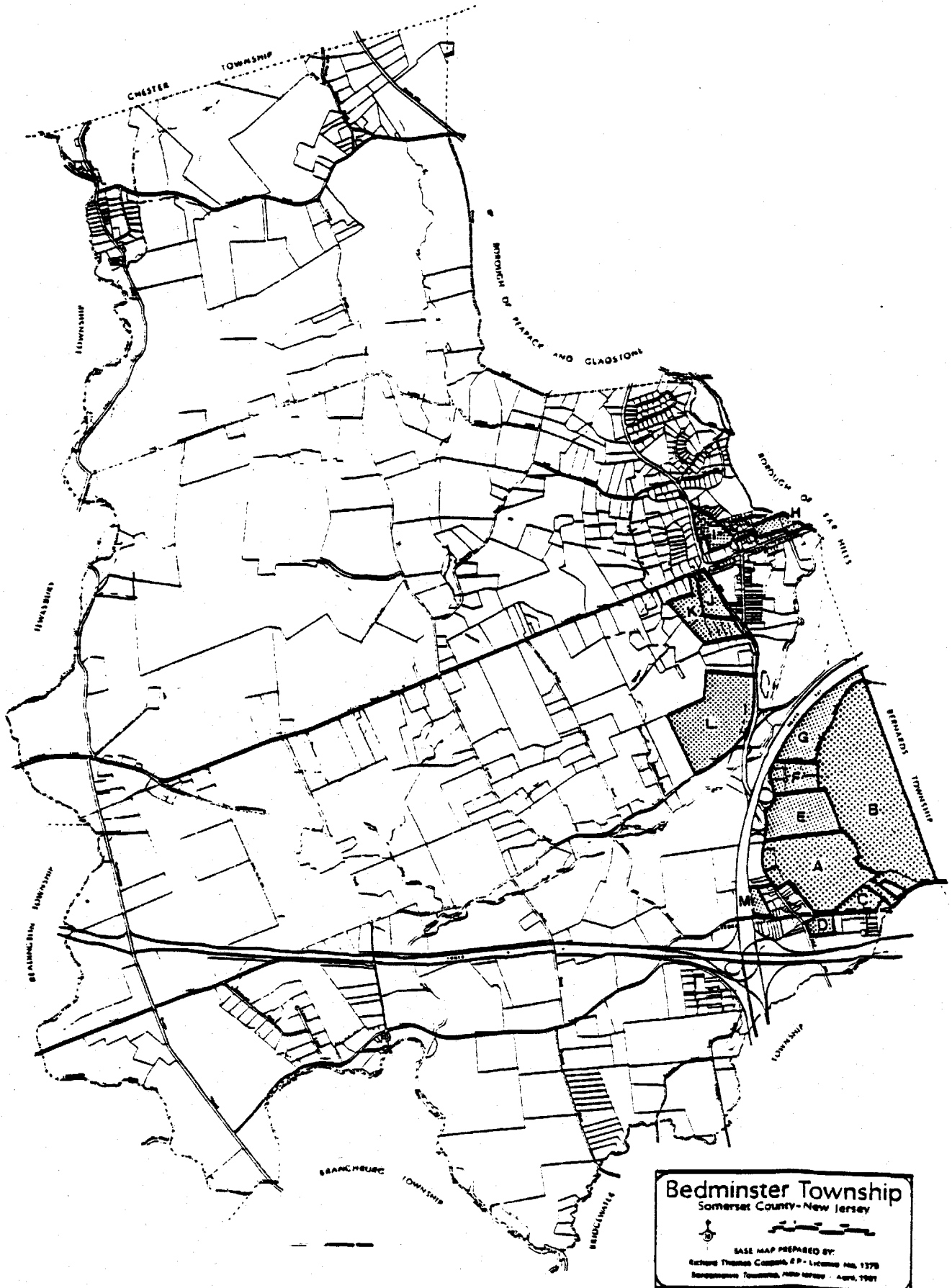
There are thirteen sites shown on Mr. Coppola's Site Identification Map (reproduced here as Map 1). Seven of these sites (A,B,C,E,F,G and H) are zoned at various densities to accommodate low and moderate income units along with market rate units. Four sites (D,I,K and M) have the option of being developed for senior citizen housing. Site J is zoned for Office Research (OR) and given the option of a higher floor area ration (F.A.R.) in exchange for a donation of 4-6 acres. Site L, the Dobbs site, is rezoned to "Single Family Cluster" with no provision for low and moderate income housing.

The total unit figure of 900 low and moderate income units can only be achieved if the following occurs: Sites A,B,C,-E,F,G and H all develop at the highest density, and none exercise the option of commercial development; either Site K or M are selected for the senior housing site and Sites D and I are developed at maximum density; Site J opts to develop at the higher F.A.R. and donates six acres to the municipality for "public purposes." The construction of 900 low and moderate income units also requires that the existing owners of the parcels comprising Site F,I and K all decide to sell their land (and homes) for higher density development. If on the other hand, site D or I were selected for senior housing, the total 900 units would not be reached. If all commercial options are taken, the sites could produce 841 du, and if the sites requiring assembly are not developed, only 767 du could be produced.

The total unit goal of 900 is only 10% above the required number of low and moderate income units (819 du), a "cushion"

SITE IDENTIFICATION MAP • June 1984
Lands Relevant to Bedminster
Township's "Mt. Laurel II"
Compliance Package

MAP 1



which is unlikely to prevent land price escalation, and does not constitute appropriate "overzoning."

Traffic and Access

One key intersection, the jughandle at River Road, will have to accommodate a significant increase in traffic from the proposed development. In order to travel south on I-287 or east or west on I-78, traffic below I-287 must travel north on Route 202-206, make a U-turn at the River Road jug handle, and then travel south on I-287 to gain entry to I-78 or continue on south I-287. Sites A, B, C, D, E, F, G and M, a total of 3,959 units all lie south of I-287, thus the traffic generated by these units would all have to use this jug handle, which is the main entry point for AT&T as well.

Table 1 below presents the relative AM peak hour trip generation of 3,959 mixed residential units (the Township sites) vs. 1,160 units on the Dobbs site.

TABLE 1 - AM PEAK HOUR TRIP GENERATION

	Inbound	Inbound
Rates*	0.21	0.55 trips per dwelling unit
3,959 units	831	2,177 vehicle trips
1,160 units	243	638 vehicle trips

* Institute of Transportation Engineers "Trip Generation", 3rd Edition, 1983. Rates shown are for single family residential units. Rates for multi-family units are slightly lower during the AM commuter period.

Assuming that during the AM commuter period at least one-half of the outbound trips will wish to travel south, east, or west on I-287 and I-78, over 1,000 vehicles would leave the Township sites northbound on 202/206, and then use the River road jughandle to go south to the I-287 south access ramp. This is an extremely high volume movement for a jughandle U-turn and would require special design provisions. Some of the U-turning traffic may enter the AT&T property to U-turn there.

This U-turn would also have to "weave" with approximately 800 vehicles which are destined to AT&T. This weaving movement would take place on the northbound section of 202/206 between the northbound I-287 off-ramp and the jughandle which would be extremely congested. The weaving traffic would exacerbate the congestion and would be a safety hazard.

By comparison, motorists oriented to the Interstate system in the AM peak from the 1,160 units on the Dobbs property will have relatively direct access to I-287 south via a right turn from River Road to 202/206 and a right movement onto the southbound I-287 ramp. This traffic will not conflict with inbound AT&T commuters at all.

Sewer Capacity

The issue of sewer capacity is critical to the development potential of all of the sites in Bedminster.

The sewer capacity demand and availability of the development sites selected by Mr. Coppola to meet Bedminster's fair share are as follows:

The EDC Plant

The sites within the EDC franchise area are A, B, C, D, E, F, and M. The total sewage capacity demand of these sites (3,510 du) combined is 842,400 gpd.¹ This is nearly the entire capacity of the EDC plant, and would enable 735 low and moderate income units to be built (assuming either site D or M develops at 90 du. Site B may be delayed by litigation with Bernards Township which affects access (see notes under Site B). The availability of sewage capacity to sites within the franchise area is presently being tested at the Public Utilities Commission.

¹ 3,510 du x 240 gpd/unit 240 gpd/unit. Is an average figure based on a mix of single and multi-family units. Site M was included at 90 du.

An office developer in Pluckemin Village, within the franchise area has sought sewage treatment capacity from EDC and been told by EDC to wait for their anticipated expansion. It is the staff position of the PUC that no "reservations" of capacity are permissible.¹

Site G (449 total du, capacity demand 107,760 gpd) is outside the EDC franchise area, which would have to be expanded prior to service.

The total demand to be served by the EDC plant is 950,160 gpd at full build out of all the proposed L&M income sites. 100,000 gpd greater than their current capacity.

The Bedminster Sewage Treatment Plant

The Bedminster Treatment Plant has the current capacity to handle 29 additional du. Site H is in the Bedminster plant franchise area, and Site I is partly in and partly out of the franchise area. The two sites combined would have a sewer capacity demand of 78,240 gpd (36 du + 290 du x 240 gpd/-unit). Sites J and K, outside Bedminster's current service area but within their potential service area, would generate a demand for 49,725 gpd sewage treatment capacity (based upon 90 units on Site K and 225,000 square feet of office on Site J at 0.125 gpd/square foot of office).

The total sewage demand to be serviced by the Bedminster plant is 127,965 gpd well in excess of the current available capacity.²

¹Mr. Doug Ziembra, PUC, telephone conversation August 21, 1984

²Mr. Ferguson, in his April 6, 1984 letter to Mr. George Raymond has stated that the Bedminster Plant's unallocated capacity is 7,000 gpd.

Detailed Site Analysis

This section of the report reviews the development potential of each site, given several cost related site characteristics: access to the site, the availability of utilities, sewer capacity, and natural factors - topography, soils, water table, bedrock, and tree coverage. None of these factors will preclude development, but they will add to the cost of site development, and the ease or difficulty of construction.

Each site is identified both by letter and by the other names which have been used to refer to it in previous case management conferences.

Information about site conditions was obtained, unless otherwise noted, from Bedminster's Master Plan Program, Part I, Background Studies, August, 1982, prepared by Mr. Coppola.

SITE A - "The Hills"

Total Units: 1287

Low and Moderate Income Units: 260, credit subject to meeting affordability standards

Acres: Not included in Mr. Coppola's 7/6/84 report

Zoning: R1/4, PUD 10 du/acre

Notes

The Site Identification Map (from Mr. Coppola's June 1984 report) includes both the Hills property (Block 59 Lot 11, 142.416 acres), two parcels (Block 59 Lots 11-1 5.639 acres and 11-2 6.365 acres, and an easement (.51 acres). Parcels 11-1 and 11-2 are owned by Arfus Development according to the tax map. These two parcels which total 12 acres apparently are not included in the calculation of low and moderate income units to be produced on this site.

As this site is currently being developed, detailed analysis is not included.

SITE B - "Top of the Mountain Hills"

Total Units: 928

Low and Moderate Income Units: 180

Acres: 257.5

Zoning: R1/4, PRD 8 du/acre

Notes

Access is the critical factor in the development of this site.

Access, Traffic and Circulation

Access is a critical issue on this site. A band of very steep slopes separates this site from the lower portion of the Hills property in Bedminster. Topographically, it is on the same elevation as the Hills property in Bernards Township. Access would be harder, more expensive and more environmentally damaging if it were through Bedminster rather than Bernards. The difficulty in terms of timing is that the Hills' development in Bernards, and accompanying roadway is currently in litigation,¹ hence Hills would have to expand Schley Mountain Road or build a new road up the mountain for access. Schley Mountain Road is a zlane "shelved" road cut into a embankment with curves and limited site lines in soil which has severe limitations on road construction.

¹Personal Communication, Nancy Ferguson, Planning Board Secretary, Bernards Township, August 17, 1984.

SITE B

Utilities

- . No water lines, proposed water storage tank south of the site.
- . Getty oil pipeline (Two 6 inch parallel lines) cross the site east to west.

SEWER

This site is within the Environmental Disposal Corporation (EDC) service area.

NATURAL FACTORS

Topography

The area between Sites A,E,F and G and Site B is comprised of slopes ranging from 15% to above 25%.

Soils

Neshaminy - Severe limitations for building foundations, septic systems, and local roads due to high water table and slopes.

Mount Lucas - Severe limitations for building foundations, septic systems, and local roads due to high water table and shallow depth to bedrock.

Water Table

Entire site has water table below 3 ft.

Depth to Bedrock

Bedrock 3'-5'.

Woods

Entire site shown as wooded.

SUMMARY

The slopes on this site limit both the developable area, and add to the cost of road construction. Access to the site is difficult. Utilities will have to be brought to the site. Both soil types found on the site present cost increasing factors to developments.

SITE C -

Total Units: 172 (with commercial option 137 du)

Low and Moderate Income Units: 34 (with commercial 27 du)

Acres: 17.18 acres

Zoning: R1/4, PUD 10 du/acre

Owner: George E. Ray

Notes

This site was previously part of the "Hills" site, and is separated here presumably due to its separate ownership. George E. Ray, the owner of record (August, 1981 tax map) also owns Site D. As a PUD site, 20% of this site could be developed commercially which would reduce the total units to 137 and the low and moderate income units to 27.

Access, Traffic And Circulation

Site C is accessible from Washington Valley Road. The intersection of Washington Valley Road and Routes 202/206 is the highest accident location in the Township¹ (6 accidents from October 1, 1980 - September 31, 1981). Additional traffic generated by this development will increase the danger at this intersection.

Utilities

- . Proposed water line on northeast boundary
- . Proposed 8" gas line on Washington Valley Road

SEWER

This site is within the EDC franchise area.

¹Bedminster Master Plan Part I, Background Studies, August 1982, Plate TR & CIRC. 4

NATURAL FACTORS

Topography

Slopes less than 15%.

Soils

Amwell - Severe limitations for building foundations, septic systems and for local roads due to high water table, front action potential, slow permeability and shallow depth to bedrock.

Neshaminy - Severe limitations for building foundations, septic systems and local roads due to high water table.

Water Table

Majority of the site has 0'-3' depth to water.

Bedrock

Entire site has 3'-5' depth to bedrock.

Woods

Roughly half of the site is wooded.

SUMMARY

The development of this site will add traffic to the most dangerous intersection in the Township - Washington Valley Road and Route 202-206. Utilities will have to be extended to the site, and the soils will add to the cost of development.

SITE D - Senior Housing Option

Total Units: 177

Low and moderate income units: 35/90 with
Senior Housing Option

Acres: 14.8

Zoning: MF, 12 du/acre

Owner: George E. Ray

Notes

This is one of the four sites designated for optional senior housing development at 15 dwelling units per acre. Mr. Coppola in his 7/6/84 report limits the total number of senior units to 90, or 6 acres without offering a rationale for limiting the units or acreage. If six acres are developed for senior housing the development rights of the remainder of the site are not specified. Out of the 14.8 acre total, if six acres were developed for senior housing, the remaining 8.8 acres could produce 105 units (12 du/acre). Out of the 177 unit total, if 90 units of senior housing were built, the remaining 87 units on 8.8 acres would mean the developer could only build at a density of 9.89 du/acres rather than the current zoning of 12 du/acre.

Access, Traffic and Circulation

This site is near the intersection with the highest accident rate - Washington Valley Road and Route 202-206. Additional traffic movements added to this intersection will increase the likelihood of accidents.

Utilities

- . A 16" Commonwealth water line runs along Route 202/206
- . A water pump station is proposed near the intersection of Knox Drive and Washington Valley Road.
- . An 8" gas line is proposed on Washington Valley Road.

Sewer

This site is within the EDC plant franchise area.

NATURAL FACTORS

Topography - No slopes above 15%.

Soils

Amwell - Severe limitations to building foundations, septic systems, and local roads due to high water table, frost action potential, slow permeability, shallow depth to bedrock

Rowland - Severe limitations to building foundations, septic systems, and local roads due to hazard of frequent stream overflow

Raritan - Severe limitations to building foundations, septic systems, and local roads due to seasonal high water table (1/2 - 3 feet) and the hazard of stream overflow on low terraces

Norton - Slight to moderate limitations on building foundations due to potential frost action. Severe limitation to septic systems due to slow permeability in the subsoil. Moderate limitations to local roads.

Water Table

3/4 of site has 0'-3' depth to water table.

Bedrock

Majority of site has 3'-5' depth to bedrock.

Woods

Site is entirely wooded.

SUMMARY

This site will also, along with Site C, add traffic to the intersection with the highest accident rate, the Route 202/206 and Washington Valley Road intersection. Any development would require clearing of the woods covering this site which is discouraged in the zoning code. The fact that this site is in a sewer service area. Water and gas will have to be brought to the site. Three of the four soil types create severe building limitations, as does the shallow water table.

SITE E - "Ellsworth"

Total Units: 599 (with commercial 480 du)
Low and Moderate Income Units: 120 (with
commercial 96 du)
Acres: 73.250, 13.552 acres critical
Zoning: R1/4, PUD-10
Owner: Duncan Ellsworth

Notes

This site is presently developed as a residential "estate." The site is located south and east of the Route 202/206 interchange with Route 287 with Route 202/206 forming its western boundary. With PUD zoning, 20% of the tract could be developed commercially which would reduce the total amount of units which could be built to 480 units, and low and moderate income units would be reduced to 96 units.¹

Mr. Ellsworth, the owner, is the secretary of the Bedminster Board of Adjustment.

Access, Traffic and Circulation

The additional traffic generated by development of this site which is immediately adjacent to the I-287 onramp and close to the Route 202/206 underpass could create a traffic hazard.

¹Commercial option calculation: 73.250 acre total less 13.552 acres critical (2.71 du) = 59.698 acres, less 20% commercial = 47.76 acres x 10 du/acre = 477.58 du + 2.71 du = 480 du. 20% low and moderate = 96 du

Utilities

- . A 16" Commonwealth Water Company line runs along Route 202/206.
- . The existing 8" gas line along Route 202/206 is not in use.

Sewer

This site is within the EDC service area.

NATURAL FACTORS

Topography

Mr. Coppola has calculated that 13.552 acres of the site are above 15% slope.

Soils

Amwell - Severe limitations for building foundations, septic systems and local roads due to high water table, frost action potential, slow permeability and shallow depth to bedrock.

Lansdowne - Severe limitations for building foundations, septic system, and local roads due to frost action potential, and seasonal high water table.

Neshaminy - Severe limitations for building foundations, septic systems, and local roads due to slopes, and seasonal high water.

Norton - Slight limitations for building foundations with basements. Moderate limitations for building foundations without basements due to frost action potential. Severe limitations for septic systems due to slow permeability. Moderate limitations for local roads due to potential frost action.

Rowland - Severe limitations to building foundations, septic systems and local roads due to hazards from frequent stream overflow and a seasonal high water table of 1-3 feet.

Watchung - Severe limitations for building foundations, septic tank systems, and local roads due to seasonal high water table of 0-1 foot.

Water Table

3/4 of site has 0'-3' depth to water table.

Bedrock

Entire site 3'-5' depth to bedrock.

Woods

3/4 of site is wooded.

Historic Resources

Higgins House - circa 1930

SUMMARY

This site is already developed, albeit at a low density. While it is immediately adjacent to Interstate 287 and Routes 202/-206, the additional turning movements could create potential traffic hazards. Slopes on the site limit the ease with which it can be developed. The fact that it is within a sewer service area. Five of the six soil types create severe problems for construction, as does the shallow water table.

SITE F

Total Units: 257 (with commercial option 206 du)

Low and Moderate Income Units: 51 (with commercial option 41 du)

Acres: 31.791, 6.198 critical

Zoning: R3 $\frac{1}{2}$, PUD 10

Owners: several

Notes

This site is located just north of the cloverleaf of 202/206 and I-287 and is subdivided into six lots with single family homes, thus would require assembly prior to development. Dr. Helen Neaves, Health Commissioner, owns two of these parcels.

Access, Traffic and Circulation

Access to the site is provided by a cul-de-sac off Schley Mountain Road which serves the existing homes. The proximity of the site to the I-287 onramp and Route 202/206 underpass would increase traffic congestion at this critical area.

Utilities

. None shown

Sewer

The site is within the service area of the EDC plant.

NATURAL FACTORS

Topography

Mr. Coppola has calculated 6.198 acres of the site are above 15% slope.

Soils

Amwell - Severe limitations to building foundations, septic system and local road due to high water table, frost action potential, slow permeability, and shallow depth to bedrock.

Lansdowne - Severe building foundation, septic system and local road limitations due to high water table.

Rowland - Severe building foundation, septic system, and local road limitations due to stream overflow hazard.

Water Table

Entire site 0'-3' depth to water table.

Bedrock

Entire site 3'-5' depth to bedrock.

Woods

3/4 of the site is wooded.

SUMMARY

This site is currently developed with single family homes, thus is not immediately available for higher density development. To the best of our knowledge, there has been no indication of willingness to develop, or assemble any of this property for low and moderate income housing or any other use. As with Site G, Schley Mountain Road would have to be upgraded if it were to serve higher density development. With the option of commercial development on this site, it may only produce 41 units of low and moderate income units. Utilities would have to be brought to the site. All three soil types create costly development constraints, as does the shallow water table.

Site G - "AT&T"

Total Units: 449 (with commercial option du)

Low and moderate income units: 90 (with commercial option 72 du)

Acres: 51.767, 6.941 acres critical

Zoning: R1/2, PUD-10

Owner: AT&T

Notes

This site has the constraint of being adjacent to I-287, thus is subject to considerable noise as well as limited access via Schley Mountain Road.

Access, Traffic and Circulation

The site is bounded by I-287 and by Schley Mountain Road, a small local road (30-35 ft. right-of-way) which would be difficult to expand given the slopes and soil types. High density development on this site would require upgrading of Schley Mountain Road.

Utilities

. None shown

Sewer

The site is not currently served by any treatment plant, and is not projected to be served according to the Upper Raritan Watershed Wastewater Facilities Plan.

The franchise area for EDC would have to be expanded to serve this area.

Soils on the site severely restrict septic systems.

NATURAL FACTORS

Topography

Mr. Coppola has calculated 6.914 acres are above 15% slope.

Soils

Amwell - Severe limitations for building foundations, septic systems and local roads due to high water table, and frost action potential, slow permeability and shallow depth to bedrock.

Mount Lucas - Severe limitations for building foundations septic systems and local roads due to high water table, shallow depth to bedrock and high stone content.

Water Table

The entire site has a 0'-3' depth to water table.

Bedrock

Entire site 3'-5' depth to bedrock.

Woods

The entire site is heavily wooded.

SUMMARY

Access and sewer availability are the major constraints to development of this site along with the fact it is heavily wooded. If it were developed, Schley Mountain Road would have to be expanded and utilities brought to the site. Both soil types create severe limitations and add to the cost of development, as does the shallow water table.

SITE H

Total Units: 36
Low and Moderate Income Units: 7
Acres: 13.582, 4.958 critical
Zoning: R1/4, PRD 6
Owner: George R. Layton, Jr.

Notes

The site is located behind the row of houses facing Route 202 and is bounded by Peapack Brook on the east and single family homes on the other three sides.

Access, Traffic and Circulation

Access to the site is via Riverwood Avenue and Tuttle Avenue to the north and east and off Route 202. The left turn movement off Route 202 near the Raritan Bridge will increase accident potential.

Utilities

- . The site has no gas lines.
- . Water lines exist adjacent to the site in the single family residential areas.

Sewer

The site is within the service area for Bedminster's Wastewater Treatment facility. If developed fully, it would require 8,640 gpd of sewage treatment capacity, (based on 240 gpd/unit). This is in excess of the 7,000 gpd capacity available from the Bedminster plant according to Mr. Ferguson's April 6, 1984 letter to Mr. George Raymond.

Soils on the site severely limit septic suitability.

NATURAL FACTORS

Topography

Mr. Coppola has calculated 4.958 ac to be above 15% slope and 2.809 ac within the 500 year flood hazard area.

Soils

Klinesville - Moderate limitation to building foundations. Severe limitation to septic systems and local roads due to shallow depth to bedrock.

Lansdowne - Severe limitation to building foundations, septic systems, and local roads due to high water table, frost action potential.

Rowland - Severe limitation to building foundations septic systems, and local road due to stream overflow hazard.

Water Table

1/2 of the site has 0-3 water table.

Bedrock

1/2 site 0-3 depth to bedrock, 1/2 site 3-5.

Flood Hazard

The site is bounded on the east by Peapack Brook. The 500 year flood boundary of the brook affects 2.809 acres of the site.

A water course bisects the site from northeast to southwest (Master Plan Background Report Part I, Plate Utility - 2).

Woods

1/2 of the site is wooded.

SUMMARY

The development capability of this site will depend primarily on Bedminster's ability to expand their sewage treatment plant (see also Site I). Mr. Ferguson has stated, in his April 6, 1984 letter to Mr. George Raymond that the Bedminster plant has an unallocated capacity of 7,000 gpd. At 240 gpd/unit, this would enable 29 more units to be built.

This site is also constrained by a water course bisecting the site which would have to be channelized, covered or designed around which would increase development costs.

Access from the west would presumably be limited to Riverwood and Tuttle Avenues to avoid the left turn off Route 202.

For a discussion of the flood hazard area, see Section I of this report.

Soils constraints will add to the cost of developing this site, as will the shallow water table.

SITE I - Senior Housing Option Site

Total Units: 290 (165 probable due to existing development -G. Raymond Planning Master.

Low and Moderate Income Units: 58 (33 probable, G. Raymond)

Acres: 24.769, 0.578 critical

Zoning: MF-12 du/acre

Owners: Several

Notes

The development potential of this site is dependent on two main questions: the ability to assemble the site into a single parcel and the capacity of Bedminster's sewage treatment plant. George Raymond in his report of January 10, 1984 contends that only 13.78 acres are available for development which would yield 165 total du and 33 low and moderate income du and only if assembled. If the entire 165 du were built, they would require 39,600 gpd of sewage treatment capacity which would

require plant expansion. As a senior housing option site, Mr. Coppola has set a limit of 90 senior units on 6 acres. As with the other senior housing sites, the development capacity of the remainder of the site is left unspecified. Can the remainder of the site be developed at the underlying density or would the senior housing development preclude other development?

The developable parcels are adjacent and behind the existing single family development along Route 206 and Hillside Avenue.

Access, Traffic and Circulation

Access to the site would be off Route 206 or Hillside Avenue. The Ease of access will depend on the ability to assemble parcels with roadway access or purchase easements.

Utilities

- . The existing 12" and 15" storm drain lines run down a portion of Hillside Avenue.
- . 3" and 6" water lines down Hillside Avenue.
- . Fire hydrant on Hillside Avenue.

Sewer

Part of the site is served by Bedminster's wastewater treatment facility and part of the site is outside their existing service area.

The site is projected to be served according to Figure 7-3 of the Upper Raritan Watershed Wastewater Facilities Plan (Malcolm Pirnie Inc., June 1981 Revision).

Soils on the site are unsuitable for septic systems.

The sewage treatment capacity needed is between 39,600 gpd (165 du) and 69,600 gpd (290 du).

NATURAL FACTORS

Topography

Mr. Coppola has calculated the critical area at 0.578 acres above 15% slope.

Soils

Penn - Moderate limitation to building foundations. Severe septic system limitations. Moderate limitation to roads due to frost action potential, and shallow depth to bedrock.

Klinesville - Moderate limitation to building foundations. Severe limitation to septic systems and local roads due to shallow depth to bedrock.

Bedrock

Entire site 0'-3' depth to bedrock

Woods

3/4 of site is wooded.

SUMMARY

According to George Raymond, 13.78 acres of this site are currently available for development as the remainder of the site is developed. The sewage treatment capacity required for this site is 39,600 gpd for 165 du (13.78 acres at 12 du/acre) which is far greater than the current potential capacity (7,000 gpd), thus Bedminster's treatment plant would have to be expanded prior to development of this site. Soils on this site present a moderate to severe limitation, as does the tree cover.

SITE J - "Trombadore"

Total Units: 0

Low and Moderate Income Units: 0

Acres: 23.5 +

Zoning: OR .

Owner: Rodenbach

Notes

This site was created by the division of a previous site to enable office development at a higher F.A.R. in exchange for 4-6 acres of residential land in Site K for "public purpose uses."

Access, Traffic, Circulation

This site is adjacent to the Research Cottrell plant, on the east side of Route 206. Office traffic in this location will add to the peak hour traffic along Route 206.

Utilities

- . 16" water line along Route 206.
- . 3 fire hydrants across 206 and Lamington Road.

Sewer

The site is not currently sewered, however it is within a projected service area. The sewage treatment capacity required for development of this site is based on a standard multiplier of 0.125 gpd per square foot of office space.¹ At this rate, if site J were developed at 0.175 F.A.R., or 179,000 square feet, the demand would be 22,375 gpd. If developed at 0.220 F.A.R., or 225,000 square feet, the demand would be for 28,125 gpd. This demand will require expansion of the Bedminster Township plant service area and capacity.

NATURAL FACTORS

Topography

Less than 15% slopes.

Soils

Klinesville - Moderate limitations to building foundations. Severe limitations to septic systems, and local roads due to shallow depth to bedrock.

¹Dr. Robert Hordon, Water Resources Consultant

Lansdowne - Severe limitations to building foundations, septic systems, and local roads due to high water table.

Reaville - Severe limitations to building foundations, septic systems, and local roads due to high water table, frost action potential, and shallow depth to bedrock.

Water Table

Majority of the site has 0'-3' depth to to water table.

Depth to Bedrock

1/2 site has 0'-3' depth to bedrock.

1/2 site has 3'-5' depth to bedrock.

Woods

Site is open.

SUMMARY

The use of non-residential development to subsidize low and moderate income housing is an idea we suggested, and support. On this site, however, it will require the expansion of the franchise area and capacity of the Bedminster treatment plant. Soils on this site present a severe limitation to construction, as does the high water table.

Access, Traffic and Circulation

Site K has access to Lamington Road and to Route 202-206 at the point the two divide. The access to Route 202-206 would require an easement through Site J or through all five properties in the southern part of the site. Access to Lamington Road is within 500 feet of the intersection with Route 206, and immediately next to the public library, thus would create traffic congestion and additional turning movements at a critical intersection.

Utilities

- . No gas lines.
- . Elizabethtown Water Company 16" line along Route 206.

Sewer

Site K is outside the existing sewer service area of both EDC and the Bedminster plant. The sewage treatment capacity required for a development of this size is 21,600 gpd (90 units x 240 gpd/unit).

If the remainder of the site is developed at the underlying density (1 du/acre) another 8,400 gpd would be required. Any development on this site will require Bedminster's Treatment plant capacity and service area expansion.

NATURAL FACTORS

Topography

No slope greater than 15%.

Soils

Klinesville - Moderate limitations to building foundations. Severe limitation to septic systems and local roads due to shallow depth to bedrock.

Lansdowne - Severe limitations to building foundations, septic systems, and local roads due to high water table.

Reaville - Severe limitations to building foundations septic systems, and local roads due to high water table frost action potential, and shallow depth to bedrock.

Water Table

Majority of the site has 0'-3' depth to water table.

Dept to Bedrock

1/2 site has 0'-3' depth to bedrock, 1/2 as 3'-5' depth to bedrock.

Woods

Site is open.

SUMMARY

This site will require an expansion of Bedminster's Sewage Treatment plant service area and capacity prior to development. The development of the senior housing on this site will depend upon the office development of Site J. The full development of Site K would also require assembly of six parcels.

SITE L is included in Section III.

SITE M - Senior Housing Option

Total Units: Varies

Low and Moderate Income Units: 90
(senior housing option)

Acres: 9.8

Zoning: VN *

Notes

This site is immediately adjacent to I-187, next to the NJDOT maintenance facility, and behind the parcels facing Route 202-206. As such it is much more appropriate for office type development rather than housing. If the site is not selected for a Senior Housing site, it would not be required to produce any low and moderate income housing under the VN category.

Access, Traffic, and Circulation

The main access to the site is off of Burnt Mills Road directly across from the major access to the City Federal office building, (170,000 sq. ft.) now under construction.

Utilities

- . 16" Commonwealth Water Company line along Route 202-206
- . 8" gas line on Route 202-206

Sewer

This site is within the franchise area of the EDC plant. If developed for senior housing (90 units) 21,600 gpd would be required.

NATURAL RESOURCES

Topography

No slopes greater than 15%.

Soils

Norton - Slight limitation to building foundations severe limitations to septic systems, and moderate limitations for local roads frost action potentials and slow permeability.

Water Table

Below 3'.

Depth to Bedrock

3'-5'.

Woods

The southwest corner of the site is wooded.

SUMMARY

The proximity to a major interstate and the adjacent maintenance facility make this an undesirable site for housing.

III. SUITABILITY OF THE DOBBS SITE

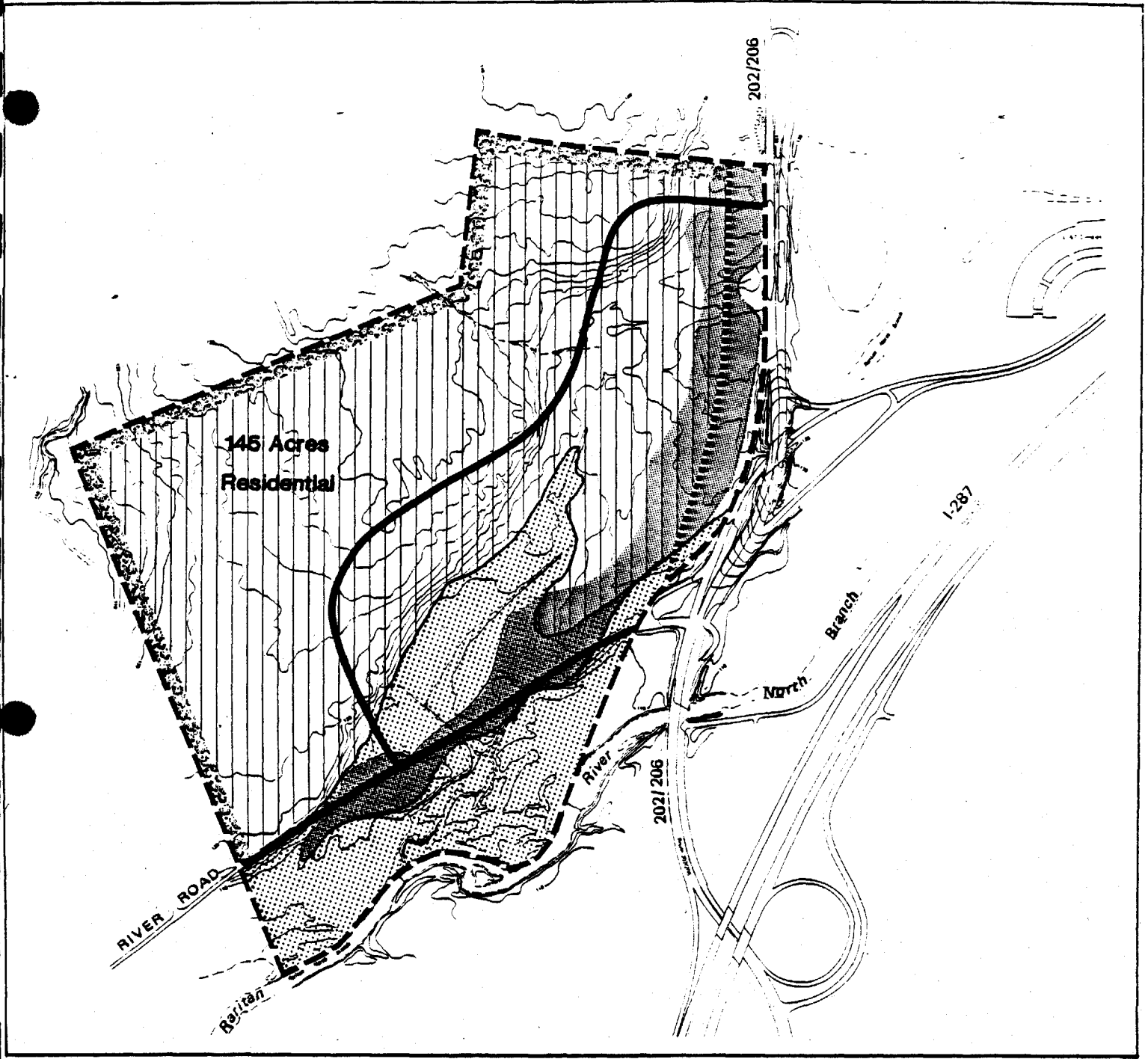
This section of the report reviews the reasons that the Dobbs site is more likely to produce low and moderate income units than the sites identified by Mr. Coppola. The principal reasons it can be developed sooner are: a ready and willing developer, the ability to provide sewage treatment on site without polluting the North Branch of the Raritan River, direct access to Interstates I-287 and I-78, and no site assembly requirements, suitable soils, and no excessive slopes.

SITE L - "Dobbs Site"





Total Units: Dobbs 1160 du
Coppola 108 du
Low and Moderate Income Units:
Dobbs 232; Coppola 0
Acres: Dobbs 211.6 acres;
Coppola 137.5, 37.5 critical
Zoning: Single Family Cluster

Notes

The actual acreage of the site is 211.6, composed of two parcels, Block 41 Lot 34 (179.8 acres) and Block 53 Lot 2 (31.8 acres). Mr. Coppola's Site Identification Map in his 7/6/84 report deletes the parcel south of River Road, and deletes 13.15 acres out of the parcel north of River Road (800' x 715.96'). Mr. Coppola states that 37.5 acres of the site are critical (within the flood plain). Our calculations, based on planimeter measure of the most recent National Flood Insurance maps, are that 21.4 acres of Block 41 Lot 34 are within the Department of Environmental Protection Flood Hazard Area (100 year flood plus 25%) and 9.8 acres are within the 100 year



PLAN B

-  500 year Flood Plain
-  Birdsboro Soil
-  200 ft. Setback
-  Landscaped Buffer

1,160 Total Units

232 Low and Moderate Income Units

928 Market Units

**BEDMINSTER
CENTER**
SOMERSET COUNTY
NEW JERSEY

WRT

Watershed Planning and Design
1000 ...
...
...



flood plain. None of these figures support Mr. Coppola's acreage total of 137.5 acres.

It is Dobbs' proposal that the entire site 211.6 acres be considered for development. As we have represented in the February 7, 1984 submission, 145 acres will be developed for residential use. The parcel below River Road would be devoted to open space, leaving 179.8 acres above River Road. The amount of critical area within the 100 year flood plain in Block 41 Lot 34 is 9.8 acres. This is the area, according to the December 19, 1983 adopted ordinance, which is protected.

One of the curious aspects of Mr. Coppola's report on this site is why it is considered part of a Mt. Laurel II compliance package when it is zoned for single family cluster development at 1 du/acre with no low and moderate income housing required.

Access, Traffic and Circulation

This site, which is just above the I-287 south on-ramp, has direct access to the Interstates. In order to travel south on I-287, east or west on I-78, all of the sites below I-287 (a potential total of 3,959 units) would have to travel north on Route 202-206 to the jug handle at River Road in order to make a U-Turn and enter I-287 south which is the only way gain to access to these Interstates.

Traffic access to the site is simplified by the existing signal at River Road, and length of access along Route 202-206.

Utilities

- . 16" Elizabethtown Water Company and Commonwealth Water Company lines on Route 206

- . Existing 8" gas line on Route 206 up to River Road not currently in use
- . Getty Oil Pipeline two 6" lines in southwest corner of the site above River Road

Sewer

One of the prime advantages of this site is the capability to provide on-site sewage treatment. A detailed description of the proposed system is provided in Dr. Hordon's report. Principally, the capability of on site treatment is afforded by the size and potential density of the site which can defray the cost of a tertiary treatment plant, and the presence of Birdsboro soil which is an excellent filtration medium. The proposed system, a Rotating Biological Disk tertiary treatment plant, with subsurface ground discharge avoids the delay and problems involved with discharge into the Raritan River. There is adequate Birdsboro soil outside the flood plain to accommodate all of the anticipated treated effluent.

The Rotating Biological Disk system is a reliable system used in several New Jersey communities in sizes up to 10 mgd, and has the support of both DEP and EPA.

The tertiary treatment provides dinitrification, and the subsurface disposal into the Birdsboro soil provides still more filtration and protection of the groundwater and the Raritan. The Birdsboro soil, as shown in Map 2, is located along Route 202-206 within part of the buffer strip. The disposal field will appear on the surface as an open grassy area, much as it is now.

NATURAL RESOURCES

Topography

No slopes greater than 15%.

Soils

Birdsboro - Moderate limitations on building foundations, septic systems and local roads.

Bowmansville - Severe limitations to building foundations, septic systems and local roads.

Lansdowne - Severe limitations to building foundations, septic systems and local roads.

In addition to this information from the Soil Conservation Service, which is based on gross aerial surveys and minimal ground checking an on site soil investigation has been done by SITE Engineers which determined favorable conditions for building foundations.

Water Table

0'-3' depth to water table throughout most of the site.

Depth to Bedrock

Roughly 2/3 of the site has bedrock at 3'-5' the rest greater than 5'.

Woods

Aerial photos indicate roughly 1/3 of the site above River Road is wooded.

SUMMARY

The prime advantages of this site are a willing developer, no site assembly requirements, on-site sewage treatment capability, and direct access to I-287 and I-78.

As previously requested by the court, concept plans were prepared in February of this year to show the development potential of the site if zoned as PRD-8 du/acre. Map 2 is "Plan B" of that submission which shows that on 145 acres of the 211.6 acre total, 1160 total units could be built, of which 20% or 232 du would be low and moderate income units.