

## **LONG HILL TWP. ENVIRONMENTAL COMMISSION**

**To:** Long Hill Twp. Planning Board Members

**From:** Terry Carruthers, Chair,

Long Hill Twp. Environmental Commission

**Date:** August 10th 2020

**Re:** Enclave at Millington (Prism application)

Block 12301, Lot 1 & Block 10100, Lot 7.01

In accordance with the legal authority and responsibility of the Long Hill Township Environmental Commission (LHTEC), the LHTEC has conducted a review of the materials provided to the commission by the Township of Long Hill dated 09/06/2019. These include, but are not limited to; Demolition, Landscape, Utilities, Grading and Drainage, Soil erosion and Sediment control, and Lighting plans; Stormwater Management Report and Stormwater Management Maintenance Plan dated 10/25/2019 and an Environmental Impact Statement (EIS) dated 04/03/2020.

### **COMMENTS**

The graphic scale on the Demolition Plan C-3 is incorrect. It should read 1" = 40', not 1" = 30'. Also, the linear-inch measurement on many of the maps is actually 1 1/8" in length, a discrepancy of 12%. Do these errors have any effect on the site plans?

#### **Ensuring that soils are appropriately remediated:**

We are concerned about the variety of chemicals and heavy metals in the groundwater and perched water zones and the risk of their migration off site. The Environmental Commission does not have the expertise to assess whether these are being addressed properly. We repeat our call that the Township should hire its own environmental expert, preferably one with experience of remediating toxic materials and chemicals. This appointee should ensure that whatever approach is

used to remediate specific chemicals and materials is the best for the situation, not necessarily the most economical.

As the site is directly upwind of a residential area and a school, the EC would like to see pre- and post-disturbance air sampling being carried out with a clear action plan in place should air quality levels deteriorate.

**Aim to reduce energy use and improve air quality:**

As energy costs are a major concern for many of us, but especially those in low-income communities, we would like to see at least the affordable housing units built to a higher energy standard than existing code; i.e., build walls with R-20+ insulation and install R-50 or greater in attics.

**Have at least one unit built as an all-electric demonstration project:**

The 2019 NJ Energy Master Plan speaks to reducing energy consumption and emissions from the building sector through decarbonization and electrification of new and existing buildings. Section 4.1.2 seeks to “partner with private industry to establish electrified building demonstration projects.” At the Preliminary Hearing on March 3rd I raised the question with Mr. Fourniadis of having at least one building built as an all-electric demonstration project, and I supplied his office with the appropriate contact name at the NJBPU with whom to follow. Has this been followed through and to what resolution?

If the buildings are going to be heated by natural gas, we would request that the furnaces used are at least 95% efficient, which would reduce heating costs and improve air quality.

**Plan for increasing use of electric vehicles:**

We welcome the inclusion of electric vehicle (EV) charging stations on the Site Plan but note that only 4 charging stations are proposed for 140 units.

Section 6.3.3 of the 2019 NJ Energy Master Plan states “build or incentivize electric vehicle charging infrastructure and incentivize the adoption of electric vehicles in low-income communities.” As of Dec. 2019 there were 30,017 EVs registered in New Jersey. In January 2020, New Jersey passed a landmark EV law that will strongly encourage the adoption of EVs in the years ahead. The target is to have 330,000 EVs registered in NJ by 2025.

One of the incentives the new law creates is something called It Pay\$ to Plug In. This program is specifically dedicated to providing grants for the installation of new EV charging stations on public and private parking lots. The grants cover anywhere from 60% to 100% of the costs of purchasing and installing EV charging equipment. They apply to Level 1 chargers (at-home plug-ins), Level 2 chargers, and the new generation of DC fast chargers.

At a minimum we would like to see EV charging stations installed in or near the homes of the affordable housing units and preferably one in every garage and parking area. This would encourage tenants to consider an EV for their next vehicle. Also, encouraging EV use in a dense urban setting such as this would help to improve air quality over the long term.

While we appreciate that some of these suggestions may impose some additional costs on the developer, they would make the units more comfortable to tenants, reduce their energy bills and lower greenhouse gas emissions from the development as a whole. They would also contribute to a healthier neighborhood, support the town's updated Master Plan, and help advance the State's energy and climate change goals.

Terry Carruthers,

Chairperson

Long Hill Township Environmental Commission