

Date: September 20, 2021

To: Town of Clinton Land Use Board

Attn: Allison Witt (via email awitt@clintonnj.gov)

Clinton, NJ 08809

From: Town of Clinton Environmental Commission, Véronique T. Lambert, Chair
(vtlambert@gmail.com)

The Environmental Commission of the Town of Clinton (EC) has reviewed the submitted plans, reports and environmental impact statement for the Moebius “Clinton Commons” development. The following comments and questions are of high interest to the EC and the EC would like them to be considered by the Applicant during their planned testimony to The Town of Clinton Land Use Board on September 21, 2021.

Lighting

Describe the measures planned to mitigate light pollution and glare from commercial pads that will affect neighboring residential properties. Regarding the commercial pad on southern-most 2558 sq ft – lighting from drive-through (both on-site and from cars) can potentially disturb neighboring residential properties on Georges St, and others. These houses are positioned up-slope from the development site and are therefore more susceptible to light coming from the commercial development. To address this, please consider:

- Do not lessen set-back – preserve at 50 ft
- Place all parking on the northern side of that pad to minimize light disturbance from cars parking on boundary with neighbors.
- Minimize light pollution from south-facing vehicles in the drive-through and at gas pumps.
- Minimize light pollution from exterior fixtures on commercial pads.

Describe how artificial light at night (ALAN) levels will be managed to minimize disruptions to wildlife.

Noise Containment

How will noise disturbance to neighbors (especially those south of the property) from activity at the drive-through be minimized? Please consider:

- Position of the drive-through speakers
- Directional flow of vehicles moving through the drive-through

Stormwater Management

We strongly endorse Condition Nos. 1, 2, and 3 of the [Highlands Council Consistency Report](#) in addressing elements of the plan that are related to stormwater management.

- **Condition No. 1:** Structures (such as loading, storage, and transfer areas) that could be major sources of contaminants in potential karst areas (areas with carbonate rock)

should be designed to prevent even unintentional discharge of pollutants to land, waterways and groundwater.

- **Condition No. 2:** The applicant is asked to implement low-impact/green infrastructure strategies for decentralized stormwater management on the site to the maximum extent practicable, instead of the proposed large-scale stormwater basin. We strongly encourage the strategies listed, including pervious paving, bioretention basins/rain gardens, vegetated swales, vegetated roofs (or partial vegetated roofs) and cisterns. We also strongly agree that “it would be helpful to include a Green Infrastructure Exhibit in the site plan package.”
- **Condition No. 3:** “Consider reducing the number of parking spaces to reduce the impervious coverage on the site. If a need is demonstrated, the applicant should consider the installation of porous asphalt parking spacing as a green infrastructure practice to offset the inclusion of additional impervious surface beyond regulatory requirements.”

Landscaping

Will the Applicant consider low-input lawns, meadows, or other ground cover with low-impact maintenance needs to minimize soil compaction and chemical contamination of soil, groundwater, and waterways?

In replacing trees removed for construction, we urge the use of native species that are well-adapted to conditions and provide high levels of ecosystem services, such as wildlife habitat, shade, stormwater uptake, and beauty. We strongly endorse “Condition No. 4” in the [Highlands Council Consistency Report](#) for recommended native plantings.