

**To: Westfield Planning Board**

**From: Westfield Advocates for Responsible Development**

**Date: February 6, 2023**

**Re: Planning Boards' Review of Redevelopment Plan**

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The Westfield Advocates for Responsible Development has reviewed the proposed Lord & Taylor / Train Station Redevelopment Plan (the “Redevelopment Plan”) to determine if it is substantially consistent with the Master Plan and the Unified Land Use and Circulation Element (“ULUC”). Based on the foregoing substantial inconsistencies, the Westfield Advocates for Responsible Development maintains that the Planning Board cannot determine that the Redevelopment Plan is substantially consistent with the Master Plan and the ULUC.

### **INTRODUCTION**

In addition to specific substantial inconsistencies set forth in detail herein, overall the Redevelopment Plan is substantially inconsistent with the values, and goals of the master plan. The Redevelopment Plan ignores the following Master Plan Guiding Principles within the ULUC:

1. *“ As we grow, we will strive to preserve the attributes of our unique, hometown character and community identity, the beauty of our natural environment, and the strengths of our neighborhoods, while lessening the adverse effects of growth”*
2. *“We will retain the best qualities of a small town and respects its heritage...”*
3. *“We value open space and parks as an integral part of our community’s hometown feel and will take advantage of opportunities for its enhancement and expansion.”*
4. *“We will maintain and enhance the historic and human orientation of our Downtown as the center of our community.”*

8. *“We realize that architectural and land use design is fundamental to our identity...”*

10. *“We will preserve our single-family neighborhoods while providing housing choices that will allow people to age in place”*.

The Redevelopment Plan is also inconsistent with the overall Goals & Objectives within the ULUC in the following areas:

1. *To provide adequate light, air, and open space by establishing, administering and enforcing bulk, density and design standards that are appropriate for the various zones and uses in the community.”*

2. *To preserve and protect the suburban character of existing residential neighborhoods through:*

a. *Zone designations based upon existing neighborhood patterns and according to the environmental requirements for the respective residential uses;*

b. *Bulk, density and design standards that are appropriate for various dwelling types and not overly intensive in relation to the lot(s) on which a dwelling is situated in their respective zones;*

c. *Discouraging through traffic in residential areas whenever possible;*

d. *Regulations to preserve and enhance visual appearance of residential neighborhoods;*

3f. *Appropriate regulations to protect and/ or replace trees/woodland impacted by development projects*

5. *To maintain and enhance the viability of the various business districts by:*

a. *Encouraging an appropriate mix of land uses that will complement one another and meet the retail and service needs of the Town;*

b. *Promoting a desirable visual environment and preserving the small-town atmosphere in the business districts;*

c. *Providing or requiring the provision of sufficient numbers of parking and loading spaces in the appropriate locations to serve the needs of the general public;*

13. *To address underutilized or vacant sites, encourage redevelopment or rehabilitation where properties meet those standards set forth in the Local Redevelopment and Housing Law.*

Many areas of the Redevelopment Plan run counter to the Master Plan Reexamination Survey responses and resulting Report as well. Specifically, the Survey was performed in 2019 to get the pulse of the residents' views with 783 people participating. There was significant responses to preserving the basic values in history/heritage of town with its small town charm, historic feel. There were many noted concerns relative to preventing overdevelopment; lack of parking; traffic congestion and cut-throughs to residential neighborhoods. The Redevelopment Plan increases development beyond both the ULUC and land use ordinances, reduces available parking and increases traffic congestion. The Redevelopment Plan runs counter to the Guiding Principles and Goals & Objectives in the ULUC, specifically to the size and scope proposed.

In addition to the substantial inconsistencies with the guiding principles and goals of the Master Plan and ULUC, the following sets forth explicit substantial inconsistencies with the Master Plan and ULUC.

**A. REDEVELOPMENT PLAN—CHAPTER 3—DEVELOPMENT PROGRAM**

**3.2 Lord & Taylor Properties (GB-2 Zone):**

**3.2.A.1 West Zone – West Building** The Redevelopment Plan proposes a fundamental change in use from business/retail to residential/business, which is substantially inconsistent with the ULUC. The bulk height is very tall with excessive density and total floor area of 170,000 SF. The building are 6 stories and 75 feet tall with a 70% density. There are setbacks from the 4<sup>th</sup> thru the 6<sup>th</sup> floor that do not provide light to the sidewalk. Inconsistencies follow:

- Redevelopment Plan includes residential use in this redevelopment zone, and is in direct conflict with ULUC, Page 41, where it states the “*The GB-2 Zone prohibits residential use of any kind*”. The Plan is also inconsistent with the Land Use Ordinance (Land Use Ordinance), 11.27 for GB-2, prohibiting residential uses.
- This side yard setback is too close to the single-family residential homes on North Avenue. This creates a 70-foot tall wall approximately 100 feet long and eliminates any privacy for the residents of the single family house. This is

inconsistent with the Guiding Principles of the ULUC above regarding preserving residential neighborhoods.

- The Plan is also inconsistent with the Dec 2019 Master Plan Reexamination Report (pages 82 & 83), as follows: *“Prohibited Uses in the GB-2 Zone The Issue: In the GB-2 Zone, residential use of any type should not be permitted. The same uses prohibited in the CBD and GB-1 zone districts should be prohibited in the GB-2 zone. What has Changed: The existing regulations found at Section 11.27 (“GB-2 District”) subsection D.4 do not permit residential uses. This objective of the 2002 Master Plan is resolved”*. The buildings are ‘overly intensive in relation to the lot(s) on which a dwelling is situated in their respective zones’.
- Since this use is prohibited, GB-2 Residential density is not defined. The maximum allowable in the GB2-AHO Affordable Housing Overlay District (the L&T is not part of this district), is 25 dwelling units per acre. With a total available lot area of approximately 194,372 sq. ft. (4.4 acres) excluding remaining L&T building, at 138 units, this is 6 dwellings/acre higher than that requirement, or a 20% increase in current standards for that GB2-AHO zone.
- Redevelopment Plan page 21 includes *“Coverage by buildings an above ground structures shall not exceed 70% of total coverage”* Land Use Ordinance 11.27 for GB-2, para E.4. only allows for 40%. This is substantially inconsistent with the ULUC to ensure consistency with (Goal #2). *“Bulk, density and design standards that are appropriate for various dwelling types and not overly intensive in relation to the lot(s) on which a dwelling is situated in their respective zones.”* A comparison of existing GB-2 zoning requirements to the proposed rezoning under the Redevelopment Plan is attached hereto as Exhibit A.
- Redevelopment Plan page 21 – The Proposed height of the West Building is significantly inconsistent with the ULUC by exceeding the proposed change to maximum height of 55’ contained in the ULUC (page 27) by 36% to 75’ (87% higher than the current Land Use Ordinance of 40’). This is substantially inconsistent with any other zoning.
- Redevelopment Plan, page 22, 24 and 30, state that the structures *“...may be built with or without Skyways”*. Nowhere in the ULUC or within the Reexamination Report Dec 2019 or Westfield’s Land Use Ordinance permits construction of a pedestrian Skyway on any parcel. This is in conflict with the ULUC Guiding Principles 2 and 8.

- The maximum GFA for residential consisting of 170,000 Sq ft is excessive and should be brought in line with the 16-24 dwelling units/acre. Redevelopment plan doubles the height, increases the allotment coverage, and permits residential usage not currently contemplated in the ULUC.

**3.2.A.2 West Zone – Center Building:** The bulk height is very tall with excessive density and total floor area of 150,000SF. The buildings are 4 stories and 75 feet tall with a 70% density.

- Redevelopment Plan page 24 – The Proposed height of the Central Building is significantly inconsistent with the ULUC by exceeding the proposed change to maximum height of 55’ contained in the ULUC (page 27) by 36% to 75’ (87% higher than the current Land Use Ordinance of 40’).
- Although retail is allowed in the GB-2 zone, the amendment from 12,500 to a maximum of 33,000 sq feet runs counter to the Streetworks development justification. The objective was to promote more walking wallets to facilitate increased density to promote economic vitality of the downtown business district, not create new retail to compete with the downtown district retailers. This is antithetical to the stated purpose for the development of this zone and therefore runs counter to the previously stated objectives of both the Master Plan and the ULUC.
- Redevelopment Plan, page 22, 24 and 30, state that the structures “...*may be built with or without Skyways*”. Nowhere in the ULUC or within the Reexamination Report Dec 2019 or Westfield’s Land Use Ordinance permits construction of a pedestrian Skyway on any parcel. This is in conflict with the ULUC Guiding Principles 2 and 8.

**3.2.A.3 West Zone – East Building** - This is a use change from business/retail to residential/business. The bulk height is very tall with excessive density and total floor area of 130,000 SF. The buildings are 6 stories and 75 feet tall with a 70% density. There are minor stepbacks from the 4<sup>th</sup> thru 6<sup>th</sup> floor that do not provide light to the sidewalk.

- Redevelopment Plan includes Residential Use and this GB-2 Zone, which is in conflict with ULUC, Page 41, where it states the “*The GB-2 Zone prohibits residential use of any kind*”. The Plan is inconsistent with the Land Use Ordinance (Land Use Ordinance), 11.27 for GB-2, prohibiting residential uses.
- The Plan is also inconsistent with the Dec 2019 Master Plan Reexamination Report (pages 82 & 83), as follows: “*Prohibited Uses in the GB-2 Zone The Issue: In the GB-2 Zone, residential use of any type should not be permitted. The same uses prohibited in the CBD and GB-1 zone districts should be prohibited in the GB-2 zone. What has Changed: The existing regulations found at Section 11.27 (“GB-2*

*District”) subsection D.4 do not permit residential uses. This objective of the 2002 Master Plan is resolved”. The buildings are ‘overly intensive in relation to the lot(s) on which a dwelling is situated in their respective zones’.*

**3.2.B. West Zone – North Sub-Zone** This is a change in use from business/retail to residential.

- Redevelopment Plan includes Residential Use and this GB-2 Zone, which is in conflict with ULUC, Page 41, where it states the “*The GB-2 Zone prohibits residential use of any kind*”. The Plan is inconsistent with the Land Use Ordinance (Land Use Ordinance), 11.27 for GB-2, prohibiting residential uses.
- This building is inconsistent with the ULUC as these residential buildings are taller than other residential buildings in all other residential zones; RA, RM, RS in the existing zoning ordinances.
- GB-2 Residential density is not defined, since it is prohibited. The maximum allowable in the GB2-AHO Affordable Housing Overlay District (which this North Sub-Zone parcel is not part of), is 25 dwelling units per acre. No defined parameters exist for residential housing in this parcel in the GB-2. This change is not consistent with the guiding principles or goals (above intro paragraphs), by increasing density, traffic, reduces light, air and open space, and is incompatible with existing land use zoning.

**3.2.C West Zone - Clark Street Site Sub-Zone:** This is a change in use from business/retail to residential.

- Redevelopment Plan includes Residential Use and this GB-2 Zone, which is in conflict with ULUC, Page 41, where it states the “The GB-2 Zone prohibits residential use of any kind”. The Plan is inconsistent with the Land Use Ordinance (Land Use Ordinance), 11.27 for GB-2, prohibiting residential uses.
- No defined number of residential apartments exist for this parcel in GB-2 that add residential housing. The maximum allowable in the GB2-AHO Affordable Housing Overlay District (which this North Sub-Zone parcel is not part of), is 25 dwelling units per acre. The Clark Street Property is only .54 acres and the proposed 16 units are over this limit. Considering the AHO zone, the max would be 13.5 units that they could build...IF it was in the overlay. Since it is not, it is inconsistent with the master plan. This change is not consistent with the guiding principles or goals, by increasing density, traffic, reduces light, air and open space, and is incompatible with existing land use zoning.
- Redevelopment Plan, page 39, includes the following min/max setbacks for the Clark Street Site Sub Zone:

	Min	Max				
Front Yard	20'	35'	Measured from North Ave			
Front Yard	15'	35'	Measured from Clark St.			
Front Yard	15'	35'	Measured from Ferris Place			
Minimum Yard	12'		As measured from Block 2506, Lot 2			

In the ULUC, page 27, with regard to businesses for this Zone, the front yards and side yards the following suggested changes: *"Consider changing the front yard set back regulation for GB-2 zone to allow for development to be located closer to the right-of-way."* and *"Consider amending the set back regulation for GB-2 zone to create an environment that provides a consistent streetscape and promotes pedestrian activity"*

The front yard set-backs above are not consistent with the Land Use ordinance, and does not support the zone designation of the ULUC residential housing in this area, and in conflict with the stated Goal #2 to preserve and protect the suburban character of residential neighborhoods. This also creates a conflict and incompatibility in land use zoning.

### 3.3 North Zone - Mixed Use & Parking Garage Subzones

This building is being proposed in the CBD, with 35 apartments in a 55' foot tall building on .28 acre site, carved out of a 2.8 acre lot. The density is 125 dwelling units per acre.

- This North subzone development is inconsistent with the ULUC as increase in density is not consistent with its Goals, in particular #8 *"Density standards that reflect existing neighborhood conditions, where appropriate, as well as the needs of various housing types.* This is well beyond the typical CBD residential housing, and incompatible with upper floors. The existing CBD has 3 stories-40 feet and requirement of 2/3 total habitable floor area of the building for residential above the first floor. The recommendation in the ULUC is for 4 stories and 55 feet height. See the comparison of existing GB-2 zoning requirements to the proposed rezoning under the Redevelopment Plan is attached hereto as Exhibit A.
- The Redevelopment Plan is substantially inconsistent with the ULUC because there is no zoning districts in the current town at this high of a density. There is no rationale or support for this level of density, and is in conflict with the guiding principles.
- North Parking Structure – This building is 2 stories and 55 ft tall structure housing 328 commuter cars plus 35 cars for the 35 apartments on the 40,000 SF portion of the public lot 7. The access and egress to this lot would be from North Ave near Elm St because the other proposed access/egress is too close to the intersection, and does not support the Guiding Principles or Goals of Minimizing Traffic.

- The Redevelopment Plan is inconsistent because the access/egress from this parking structure does not meet NJDOT regulations for the minimum distance from a signalized intersection, which is 100 feet. This is a safety issue and does not meet the safety concerns of the Master Plan and ULUC report. Additionally, this site was evaluated as part of a parking study performed by Rich Consultants in 2002 and was specifically ‘rejected’ because “ This lot is far too small to accommodate this, and its size and shape also results in an uneconomical structure configuration.
- The ULUC report references the Master Plan and states that “*Buildings should be small to medium in scale, in keeping with the pedestrian-oriented environment, and should be designed to be compatible with other buildings in the district and to be consistent with historic district and historic site design guidelines.*” The Redevelopment Plan proposed to build is a large structure, beyond the compatible buildings in the area, that are limited to 40’ and 3 stories.
- ULUC Report page 24 states that 59% of survey respondents said that the Town should work to add more parking in the Downtown as a way to improve mobility - more parking for shoppers not moving commuters into a parking structure. The master plan indicates that “*...office and apartment uses should not be permitted to reduce the amount of parking available to shoppers and retail merchants.*” Unfortunately, the Redevelopment Plan is significantly inconsistent with this goal, as no additional parking is available for shoppers and retail merchants. The Parking deck will be primarily for commuters, and not weekday shoppers.
- The ULCU reference indicates that “*...areas for deliveries and refuse storage and pickup should be at the rear of side of buildings and should not interfere with pedestrian or vehicular traffic.*” Given the very tight location, and pedestrians (commuters) continuous access to the rear of the parking deck to reach the train platform, the Redevelopment Plan is inconsistent with the master plan.
- ULCL Report page 27 recommends increasing the maximum building height in the CBD zone from 40 to 55 feet and from 3 to 4 stories with a minimum 10-foot step back from the property line for the fourth floor. The proposed structure is in excess of current zoning

### **3.4. A SOUTH ZONE - Public Area Subzone**

The proposed Garage in this Subzone is to serve 200 plus commuter cars the lot depth, however the depth is only 170 feet. The Redevelopment Plan’s proposed parking garage is inconsistent with the guidelines in the ULUC and re-examination report, as the site is small and the parking deck will be inefficient, with more travel lanes/circulation in



relation to parking spots. The lot depth is 68 feet which is deemed substandard for parking garages

- The South parking garage encumbers the viewscape to the historically nominated train station which will be positioned too closely to the historically sensitive structure.
- Inadequate access from the parking structure will prevent adequate ingress and egress from the parking structure and at 5 stories (most likely resulting in 6 stories if adequate commuter parking is established), the parking structure will fail to comply with the ULUC objectives. Additionally, the objective found in the masterplan of "*To provide light, air and open space by establishing, administering and enforcing bulk, density and design standards that are appropriate for the various zones*" is not evident by a 5-6 story garage looming over the projected public space and the historical train station.

### **3.4.B SOUTH ZONE - Office Subzone**

This is a change in use from surface parking lot to office building, it is still in the Central Business District Zone. The bulk and height is very tall with excessive building mass and total floor area of 210,000 SF in two buildings of 105,000 SF each. The separation between buildings is a 25-foot minimum. There is no rear yard and all servicing access appears to occur through the public parking lot. This proposed parcel does not provide access from a legal right of way.

- The Redevelopment Plan for these structures are substantially inconsistent with the ULUC with regard to height, bulk, density and not consistent with the Master Plan Overall Goals and Objectives, items 12, items 2 a, b, c. Specifically, Item Goal #1: "*To provide adequate light, air and open space by establishing, administering and enforcing bulk, density and design standards that are appropriate for the various zones and uses in the community.*"
- Redevelopment Plan, page 51, recommends Maximum Height and Stories of 65' and 5, respectively, and page 27 of the ULUC recommends only increasing heights from 40' to 55' and 3 stories to 4 stories. This change is substantially inconsistent with the local Land Use ordinance and the beyond the recommendations in ULUC.
- This height is excessive, but the building are also large in mass and proportion and inconsistent with the objectives of both the land use and masterplan objectives to grow and develop in a consistently "small town" environment aesthetic. Exceeding the size and proportion of any other structures within the business district as well as any other structures throughout town, these buildings

will serve to visually divide the town rather than act as a way to join the two sides together. Zones should be based upon existing neighborhood patterns and ‘not overly intensive in relation to the lots on which a dwelling is situated’.

- The Commercial Buildings will block light and views of the downtown looking from the Boulevard Historic District. The structures on South Avenue will create an urbanized environment that creates a narrow passage between Central Avenue and Westfield Avenue, and development of these structures run counter to guiding principle #3 *“We value open space and parks as an integral part of our community’s hometown feel and will take advantage of opportunities for its enhancement and expansion.”*
- In the ULUC guiding principle #11, ‘to promote the conservation of the various historical site, structures and districts by establishing appropriate regulations for preservation of historic sites and structures and establishing regulations that encourage development and redevelopment in historic districts to be compatible with existing historic structure and sites in the district.
- Regarding buffers between zones, and item 7b (page 13), the 20-foot side yard separation is insufficient. Item 8b that indicates densities should reflect existing neighborhoods – the RS6 and new RA zone should have sufficient buffers
- The Train Station Buildings in the 2002 Historic Preservation element are designation-eligible properties and the proposed Office Buildings and Parking Garage violate the objectives of the ULUC (guiding principle #1,2,4) and Masterplan.
- Redevelopment Plan, page 47 & 51, is inconsistent with the ULUC by recommending a Minimum Rear Yard setback of 0’ from the property line directly opposite South Avenue. There is no mention of changing the rear yard setback of 10’ in the ULUC for the CBD. This is inconsistent with the goals and objective identified above.
- The size and scale of the office buildings, along with the employees, will cause additional traffic back-ups and encourage through-traffic in residential areas, which is in direct conflict with ULUC Goal #6 that seeks to minimize *“Minimizing traffic congestion and providing for safe and convenient access to properties”*
- The Redevelopment Plan on page 1 states that the *“...Westfield Train Station have been utilized and enjoyed by generations of Westfielders. Over time, however, the uses on the sites have become obsolescent. Their design and function are no longer aligned with either market realities or best practices for downtown*

*development*” Nowhere in the Redevelopment Plan was a comparative analysis provided that would confirm this assertion. The Plan fails to provide supporting data fully utilized and convenient parking lots for hundreds of residents each day that are generating revenue are deemed “obsolete” for the community. Notwithstanding the designation of the sites as in need of redevelopment, many residents enjoy the convenience of parking, and no supporting data has been shown or provided under the Master Plan Reexamination Report or within the ULUC that commuters are willing to trade convenience of ground level parking for commercial development and the additional traffic that comes from that.

**B. REDEVELOPMENT PLAN—CHAPTER 6 AND 7—CIRCULATION AND PUBLIC PARKING**

The Redevelopment Plan is substantially inconsistent with the Master Plan and the ULUC with respect to circulation, traffic and public parking. The ULUC includes guiding principles of the need to minimize congestion and traffic issues and prioritize safety. The proposed Redevelopment Plan is substantially inconsistent with these guiding principles. In addition, the Redevelopment Plan is substantially inconsistent with specific provisions of the ULUC as set forth in the table attached hereto as Exhibit B.

**C. REDEVELOPMENT PLAN—CHAPTER 3.6—PRIVATE PARKING**

The Redevelopment Plan is not substantially consistent with the ULUC with respect to rezoning required private parking spaces for the project. The following chart combines the existing parking requirements, the recommended parking requirements from the ULUC (pages 30 and 172) and the parking requirements in the Redevelopment Plan (page 57):

Land Use	ZONING ORDINANCES	ULUC	REDEVELOPMENT PLAN	REDEVELOPMENT PLAN
	Existing Parking Requirements	Recommended Parking Requirements	Parking Requirements Minimum	Parking Requirements Maximum
<b>Commercial</b>				
Professional Office	1.0 spaces/200sf GFA	4.0 parking spaces per 1,000KSF	4.0 spaces/1,000 SF GFA (Medical Office)	6.0 spaces/1,000 SF GFA (Medical Office)
Business/ Administrative Office	1.0 spaces/250sf GFA (under 50,000sf) 1.0 spaces/300sf GFA (50,000+ sf)	3.0 parking spaces per 1,000KSF	2.5 spaces per 1,000 SF GFA	4.0 spaces per 1,000 SF GFA
<b>Retail</b>				
General Retail Sales/Services	1.0 spaces/300sf GFA	3.3 parking spaces per 1,000KSF	2.5 spaces per 1,000 SF GFA	4.0 spaces per 1,000 SF GFA
<b>Restaurant</b>				
Predominantly Full Service	1.0 spaces per 2 seats	12.0 parking spaces per 1,000KSF	8 spaces per 1,000 SF GFA (Restaurant/Bar)	12 spaces per 1,000 SF GFA (Restaurant/Bar)
Predominantly Take Out	1.0 spaces/65sf GFA or 1.0 spaces/3 seats, whichever is greater	8.0 parking spaces per 1,000KSF		

Residential				
Multifamily Residential	0.8 spaces/1 BR unit	1.35 parking spaces per total unit count	1.35 spaces/unit (all zones except North Zone) 1 space/unit (North Zone)	2 spaces/unit (all zones except North Zone) 1.5 space/unit (North Zone)
	1.3 spaces/2 BR unit	0.7 parking spaces per total bedroom count		
	1.9 spaces/3 BR unit			

**1. South Avenue Offices**

The Redevelopment Plan is not substantially consistent with the ULUC of the Master Plan with respect to rezoning required parking spaces for the South Avenue Offices that will be up to 210,000 square feet of office use. The number of required spaces for the proposed 210,000 square feet South Avenue Offices is wholly inadequate and is the equivalent of a 25% reduction from current zoning ordinances and a 16% reduction from the ULUC recommendations as set forth below:

	<b>Current Zoning Ordinances Required Parking Spaces (§17.02(C)(5)(c))</b>	<b>ULUC Recommendations Required Parking Spaces</b>	<b>Redevelopment Plan Parking Proposed Required Spaces</b>
<b>210,000 sq. ft. South Avenue Offices</b>	<b>700</b>	<b>630</b>	<b>525</b>

Not surprisingly, the number of proposed parking spaces of 525 is the exact number of spaces that Streetworks is proposing in the Redevelopment Plan at its South Avenue Offices. However based on Streetworks’ own projections, this reduction in the number of spaces is a substantial deviation from the ULUC because there will be grossly insufficient parking for tenants, visitors and retail employees at the South Avenue Offices. As a result, the maximum parking requirement under the Redevelopment Plan cannot be considered when determining that the parking requirements under the Redevelopment Plan are substantially inconsistent with the ULUC, because that maximum can never be met for the South Avenue Offices.<sup>1</sup>

With respect to office workers, based on Streetworks projections, it can be estimated that 630 passenger vehicles will be driving to its South Avenue office buildings as calculated below:

1350 projected office workers for 310,000 sq ft of total office use<sup>2</sup>

210,000 sq ft of office use at South Avenue

100,000 sq ft of office use at L&T property

Two thirds of 1350 office workers at South Avenue offices = 900 office workers

900 office workers \* 70% = 630 office workers driving to South Avenue<sup>3</sup>

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<sup>1</sup> The maximum required parking would require 840 spaces for 210,000 sq ft at of general office use and the South Avenue offices will only have 525 spaces, a deficit of 315 spaces, with an an addition deficit of spaces required for retail use and visitors of the tenants.

<sup>2</sup> Number of office workers provided by Streetworks’ in its projections of spending by office workers in email from Streetworks sent on January 24, 2023.

Even assuming that the traffic experts have not significantly overestimated that thirty percent of the office workers will take public transportation, there would be 630 office workers driving to the South Avenue Offices with only 525 parking spaces, **a deficient of 105 spaces**. Notably, this analysis is based on Business/Administrative Office use as opposed to Professional Office use. If any portion is used for Professional Office use, it requires an additional parking space per 1,000 square feet, thereby increasing the deficit.

With respect to visitors of the Office tenants, Streetworks is projecting that on average 55 of the spaces will be used by visitors.<sup>4</sup> Deducting 55 spaces from the total of 525 spaces leaves only 470 spaces “on average” available to 630 office workers driving to the South Avenue offices, **increasing the deficit of required parking from 105 to a deficient of 160 parking spaces**.

Finally, the parking deficit above does not include the additional deficit for the retail space of up to 18,000 square feet at the South Avenue Offices. Even using the lowest parking requirement use of general retail, the developer would have to provide an additional 45 parking spaces for this retail use, less 16 spaces of proposed on-street parking on South Avenue (18 \* 2.5 - 16).<sup>5</sup>

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<sup>3</sup> Streetworks’ traffic experts assume that 30% of office workers will use public transportation.

<sup>4</sup> As per email from Streetworks sent on January 24, 2023.

<sup>5</sup> The Redevelopment Plan provides that “No off-street parking shall be located along the South Avenue frontage.” (page 53) It also says that the developer can use the 16 parking spaces on South Avenue to satisfy its parking requirements

All combined, even assuming the uses with the lowest parking requirements and that 30% of office workers will take public transportation,<sup>6</sup> the proposed reduction in parking requirements under the Redevelopment Plan for the South Avenue Offices leaves a 205 space deficit.

<b>Office Workers</b>	<b>630</b>	<b>(SW estimate)</b>
<b>Visitors</b>	<b>55</b>	<b>(SW estimate)</b>
<b>Retail</b>	<b>29</b>	<b>(proposed rezoning)</b>
	<b>730</b>	
<b>Parking at Offices</b>	<b>-525</b>	
<b>Deficit</b>	<b>205</b>	

There is no justification for this substantial inconsistency with the ULUC. First, this is not a proposed use near available public or alternative parking that could justify such a reduction in parking requirements. Second, the shared parking between zones permissible under the Redevelopment Plan will not fix the problem because the required parking for other zones is the minimum recommended under the Master Plan, is less than Streetworks’ own projected need, and the other zones are located too far away to satisfy tenant and visitor requirements for “Class A” office tenants the South Avenue Offices.<sup>7</sup> Further, there will not be any excess to public parking that Streetworks can utilize to meet its parking requirements under a PILOP or otherwise because public parking under the Redevelopment Plan is likewise inadequate and substantially inconsistent with the ULUC as discussed under the section of Public Parking.

<sup>6</sup> Assumes the lowest use of retail. A restaurant use would result in a higher deficit of parking.

<sup>7</sup> One recent article indicated that while 4 spots per 1,000 square feet is typical for Class A offices, many tenants are asking for ratios of 5 or 6. <https://www.commercialrealestate.loans/commercial-real-estate-glossary/parking-ratio>. The Redevelopment Plan is significantly less than typical for Class A offices and not even close to the 5 to 6 ratio most tenants want.



Based on Streetworks' own projections, the Redevelopment Plan reduction of the recommended parking requirements in the ULUC, allows Streetworks to have a deficit of at least 205 parking spaces at the South Avenue offices for tenants and visitors.

## **2. L&T Properties**

Unlike the South Avenue Offices which will be zoned as CBD, the L&T properties are not being rezoned as CBD. The ULUC recommendations for reduced parking requirements only applied to the CBD, not to GB-2 general business district zones. Therefore, any deviations in the Redevelopment Plan from current parking requirements by ordinance are substantially inconsistent with the ULUC which throughout requires adequate parking. Even using the ULUC recommendations for the CBD, the proposed required parking under the Redevelopment Plan is grossly inconsistent with current zoning and results in inadequate parking required under the ULUC. According to Streetworks, the residential buildings and office building will share 530 parking stalls located in the podium and below grade garages.<sup>8</sup>

### **a. Office Workers**

Streetworks' projects 450 office workers for the offices at this site and an additional 50 residential workers for a total of 500 workers.<sup>9</sup> If seventy percent of these workers drive, as projected by the traffic experts, there will be 350 office and residential workers driving to the L&T sites yet the rezoning under the Redevelopment Plan only requires 250 parking spots (2.5 spaces per 1,000 = 250 spaces for 100,000 office use) leaving a 100 space parking deficit. Notably, this analysis is based on Business/Administrative Office use as opposed to Professional Office use. If any portion is used for Professional Office use which would require an additional parking space per 1,000 square feet, the deficit is greater.

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<sup>8</sup> As stated in One Wesfield Place FAQs.

<sup>9</sup> Number of office workers provided by Streetworks' in its projections of spending by office workers in email from Streetworks sent on January 24, 2023. See calculations above.

**b. Retail**

The Redevelopment Plan provides for 2.5 spaces per 1,000 square feet for retail which is significantly less than the 3.3 spaces required under the ULUC for CBD and, therefore, is substantially inconsistent with the ULUC. Based on 33,000 of allowed retail use at the L&T site, this results in a reduction of 26 spaces from the number of parking spaces required in the ULUC.

**c. Restaurant Use**

The Redevelopment Plan provides for 8 spaces per 1,000 square feet of restaurant use which is significantly less than the 12 spaces for CBD under the ULUC and, therefore, is substantially inconsistent with the ULUC.<sup>10</sup> Based on 33,000 of allowed retail use at the L&T site, this results in a reduction of 26 spaces from the number of parking spaces that would be required in the ULUC for CBD zones.

The rezoning of parking requirements for the South Avenue Offices and the L&T properties under the Redevelopment Plan is substantially inconsistent with the ULUC and the Town and the Planning Board should require that the Redevelopment Plan be consistent with the ULUC and not approve the proposed Redevelopment Plan.

**D. REDEVELOPMENT PLAN—CHAPTER 7—PUBLIC PARKING**

The Redevelopment Plan is substantially inconsistent with the Master Plan and ULUC with respect to public parking as it does not provide or require the provision of sufficient number of parking and loading spaces in the appropriate locations to serve the needs of the general public. As set forth on the chart attached hereto as Exhibit C, the Redevelopment Plan significantly reduces public parking and does not add much needed parking for downtown

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<sup>10</sup> The difference between current zoning ordinances for GB-2 is likely even more significant but with no information on the size of the proposed restaurant use it cannot be calculated under current zoning ordinances which require 1.0 spaces per 2 seats.

patrons during business hours or for commuters. Both of these concerns were overwhelming expressed by respondents to the Master Plan survey.

#### **E. REDEVELOPMENT PLAN—CHAPTER 2—HISTORY**

The Master plan and the ULUC contain specific objectives regarding historic preservation of various historic structures which add aesthetic and historic recognition to our town. The Master plan and the Uniform Land Use documents both contain specific objectives to “conserve these historic sites, structures and districts” through establishing appropriate regulations to encourage redevelopment ...”to be compatible with existing historic structures and sites”. Additionally, the ULUC’s objectives of 1, 2, and 4 outline that the guiding principles are to protect the “hometown character and community identity, retain the best qualities of a small town and respect its heritage, maintain and enhance the historic and human orientation of our downtown as the center of our community”.

The Masterplan re-examination survey’s responses hinged on the fact that people moved to town for the downtown but ALSO for its small town charm and basic values based on history and its heritage. The historic feel of town highlighted the fact that those respondents were concerned about over development in the quest of addressing their other concerns of a lack of parking for shoppers during the daytime, and significant concerns surrounding traffic congestion and basic pedestrian and bicycle safety with the increased traffic that would undoubtedly be an issue with any large scale development plan. Traffic congestion is highlighted as one of those top concerns which is addressed later in this Development plan response.

It is quite clear that the ULUC and the Masterplan document objectives highlight the basic values of protecting our downtown and business hub from overdevelopment to the degree that it fundamentally changes the historic charm and character of the downtown Central Business

District and its surrounding environment. The Streetworks development plan with its 6 story apartment buildings, 5 (potentially 6) story garages placed in poorly located areas and excessively large office structures that are 5 story (2 story first floor with 3 floors on top) fatally encumbering our historic train station and one of a kind historic newspaper kiosk, flies in the face of the ULUC and Masterplan objectives.

There is another solution where we can achieve our common development objectives that will move our downtown forward in a manner that will not destroy our heritage, small town environment and block viewscapes to our most historically sensitive structures in town. Preserving our heritage is core to who we are as a community but with acknowledgement and incorporation of public input in a meaningful manner, we can both move our town of Westfield into the future without sacrificing our basic common values.

**F. REDEVELOPMENT PLAN—CHAPTER 9—RELATIONSHIP TO OTHER PLANS**

Reviewing the Redevelopment Plan’s relationship to other plans, the Redevelopment Plan is substantially inconsistent with both Westfield’s Master Plan and ULUC, and other plans as set forth below.

**ULUC**

**1. p.11 ULUC:** “... the opportunity that Westfield has to create a plan that views land use and circulation wholistically to ensure that future growth and investments reflect the character and desire of the Town's residents... and meet the demand for high quality living that current and future residents desire.”

***- The L & T/Train Station Redevelopment Plan is not consistent with this statement (density, building heights, “concepts in urban design” are not consistent with CBD)***

## 2. p.18 ULUC: *Town Vision*

The Town of Westfield, celebrated its 300th anniversary in 2020. It is a vibrant community with a small-town feel...

Westfield will be a model of carefully managed development....

New development will preserve and celebrate the Town's history..

Westfield cherishes its heritage, while taking full advantage of new technologies and innovations.

***- The L & T/Train Station Redevelopment Plan is not consistent with this statement (density, building heights, “concepts in urban design” are not consistent with the CBD).***

***The plan 'cherry-picks' concepts associated with urban planning and design and is not consistent in its application.***

**3. The ULUC includes twelve guiding principles.** The L&T Redevelopment plan is inconsistent with four of them:

**Guideline 1-** ULUCU: “As we grow, we will strive to preserve the attributes of our unique, hometown character and community identity, the beauty of our natural environment, and the strengths of our neighborhoods, while lessening the adverse effects of growth”

***- The Lord & Taylor/Train Station Redevelopment Plan states: “Where development is proposed adjacent to residential properties, the Plan includes significant buffer requirements.”***

***Modified plans for the Lord & Taylor site are inconsistent with this statement.***

**-Guideline 2** ULUC: “We will retain the best qualities of a small town and respect its heritage, while embracing the opportunities that new technologies, programs, and concepts in urban design provide.”

***The L & T/Train Station Redevelopment Plan states: “This Plan features thoughtful urban design standards...to help integrate development with the fabric of downtown Westfield.”***

***Extreme use of “urban design standards” are inconsistent with ULUC guideline to maintain the fabric of downtown Westfield. The plan 'cherry-picks' concepts associated with urban planning and design and is not consistent in its application.***

**-Guideline 4-** ULUC: “We will maintain and enhance the historic and human orientation of our Downtown as the center of our community.”

*The L & T/Train Station Redevelopment Plan states: “The Plan reinforces the status of*

*Downtown as the center of Westfield. It seeks to maintain the historic and human orientation of Downtown...”*

*Extreme use of “urban design standards” are inconsistent with ULUC guideline to maintain the historic orientation of downtown. The plan 'cherry-picks' concepts associated with urban planning and design and is not consistent in its application.*

*Creation of a secondary business district in the south side parking lots in inconsistent with keeping Downtown as the center of Westfield*

**-Guideline 11- ULUC:**” ...we will encourage a variety of employment opportunities, and promote unique local businesses.”

*The L & T/Train Station Redevelopment Plan states: “The new workers and visitors brought to Town through implementation of this plan will support local businesses”*

*No data has been provided to support this assumption*

**4. ULUC Community Forum Plan:** The Community Form Plan includes numerous recommendations and observations regarding the Lord & Taylor sub-area, including:

**West Zone**

1. “Greater design guidelines are needed to ensure that development is consistent with the existing character of downtown Westfield.”
2. “The Town should work with the redeveloper to encourage architectural designs to help break up the massing of new buildings.”
3. “It may be appropriate for only office or residential uses.”

*The L & T/Train Station Redevelopment Plan is not consistent with these guidelines (density bulk design and building heights). The plan 'cherry-picks' concepts associated with urban planning and design and is not consistent in its application.*

*Amount of retail and restaurants proposed in West Zone is inconsistent with these guidelines*

**4a. Community Forum General recommendations:**

1. “Take into consideration the recommendations made in THA Consulting’s Parking Plan”

*THA Parking plan has been contested multiple times and inconsistent information has been provided about various parking questions*

2. “Explore the use of architectural design guidelines and standards that mandate attractive architectural design for future development”

*The L & T/Train Station Redevelopment Plan is not consistent with these guidelines (density bulk design and building heights).*

3. “This Redevelopment Plan is informed by the Storm Resiliency, Smart Growth, and Environmental Sustainability component of the Unified Land Use and Circulation Element.”

*The L & T/Train Station Redevelopment Plan is not consistent with these guidelines in the following identified areas:*

Foster Distinctive, Attractive Communities with a Strong Sense of Place

Strengthen and Direct Development Towards Existing Communities

Make Development Decisions Predictable, Fair and Cost Effective o Encourage Community and Stakeholder Collaboration in Development Decisions

## **5. Other Elements of the ULUC/ Historic Preservation**

*The L & T/Train Station Redevelopment Plan states:* “In regard to the central business district, the Master Plan states that it “has always been one of Westfield's most salient features, and its survival and continued prosperity in the era of shopping malls has been a key factor in Westfield's ability to maintain its position as a prime residential community.” **Bearing this in mind, this Plan considers the downtown’s historic value in putting forth design standards that complement the historic fabric that makes up much of the central business district,** and by making direct reference to the Town’s Historic Preservation Commission’s review role.

*The L & T/Train Station Redevelopment Plan is not consistent with these guidelines (density, bulk design, building heights and creation of additional business district on the So. Side parking lots). The plan 'cherry-picks' concepts associated with urban planning and design and is not consistent in its application.*

## **Union County Master Plan**

*The L & T/Train Station Redevelopment Plan states:*” ...facilitate the development of Union County by directing new growth to environmentally suitable areas that can be provided with essential infrastructure and support facilities and to revitalize the urban centers and corridors within the County”

*The L & T/Train Station Redevelopment Plan is not consistent with Union County Master Plan due to insufficient infrastructure and current traffic plan disputes*

### **Union County Transportation Master Plan**

**Goal #1:** “To improve and maintain a sound transportation infrastructure designed to support the growth of Union County and better serve all users.”

*The L & T/Train Station Redevelopment Plan states:* “The Plan seeks to facilitate an environment that attracts emerging industries to Union County, as well as regional business and tourism, while remaining cognizant of capacity limitations”

*The L & T/Train Station Redevelopment Plan is inconsistent with Goal #1 and does not provide analysis to support the it’s statement. A wholistic infrastructure plan has not been made available to the public.*

**Goal# 4:** To maintain the efficient movement of goods

*The L & T/Train Station Redevelopment Plan states:* “This Redevelopment Plan advances this goal by including loading standards that promote safe and efficient truck travel, as well as by mandating traffic impact studies to evaluate impacts on circulation.”

*The L & T/Train Station Redevelopment Plan does not provide detailed information regarding loading standards and access to proposed office buildings on the south side lot and traffic impact studies did not include increase in truck travel caused by new office & residential buildings*

### **New Jersey State Planning and Redevelopment Plan (SDRP)**

1. The following intent was documented for PA-1(Redevelopment Plan are)

Stabilize older suburbs, redesign areas of sprawl, Protect the character of existing stable communities

*The L & T/Train Station Redevelopment Plan is inconsistent with these guidelines. Westfield does not require stabilization, does not have areas of sprawl and character of the existing stable community will not take place with current plan (design, density, building heights)*

2. The SDRP also puts forth statewide goals, including:

“Preserve and enhance areas with historic, cultural, scenic, open space, and recreational value”



*The L & T/Train Station Redevelopment Plan is inconsistent with these guidelines. Design, density, building heights, loss of open space (surface lots), loss of sightlines do not preserve or enhance areas of historic, cultural, scenic & open space*

### Surrounding Communities Master Plans

*The L & T/Train Station Redevelopment Plan states:* “The Local Redevelopment and Housing Law requires that a redevelopment plan identify any significant relationship of the redevelopment plan to the master plans of contiguous municipalities. **Based on the location of the Redevelopment Plan Area and the distance from any municipal borders, no significant relationships with the master plans of adjacent municipalities were identified.**”

*This indicates a lack of wholistic planning and contradicts previous statements in the Redevelopment Plan regarding traffic plans, infrastructure & coordinated land use density*

#### **Cranford:**

*The L & T/Train Station Redevelopment Plan states:* “This Plan is generally consistent with those goals and objectives”. This includes:

“Define residential uses and boundaries to guard against intrusion from incompatible land uses”

“Require all in-fill development to be done in a manner that is consistent and compatible with the surrounding neighborhood and environment.”

*The L & T/Train Station Redevelopment Plan is inconsistent with the Cranford Master Plan in these areas*

#### **Garwood:**

*The L & T/Train Station Redevelopment Plan states:*” Garwood’s goals and objectives are generally consistent with this Plan.” Relevant goals include:

To ensure that the development of the Borough does not conflict with the development and general welfare of neighboring municipalities, the County, and the State as a whole.

Guide the future development and/or redevelopment of land within the borough so as to incorporate new construction without undue disruption to the established character of the Borough.

To encourage the location and design of transportation routes which will promote the free flow of traffic while discouraging location of such facilities and routes which result in congestion or blight

*The L & T/Train Station Redevelopment Plan is inconsistent with the Garwood Master Plan in these areas (traffic, disruption of established character, development impact on other communities)*

**Mountainside:**

*The L & T/Train Station Redevelopment Plan states: “The Borough of Mountainside’s goals and objectives are generally consistent with this Plan.” Relevant goals include:*

1. To promote a desirable visual environment through creative development techniques and good civic design and arrangements. Any new or additional construction or renovation shall be designed to aesthetically fit the established character of the existing neighborhood and the entire Borough in general.

*The L & T/Train Station Redevelopment Plan is inconsistent with the Mountainside Plan. Size, density, height & design do not ‘aesthetically fit the established character of the existing neighborhood and the entire town in general’.*

2. Critical Areas: Encourage the most appropriate use of land considering its character and peculiar suitability for certain uses by:
  - o Regulating the intensity of land use
  - o Providing sufficient open space
  - o Promoting a desirable visual landscape
  - o Providing for planned development which incorporates the best features of type, design, and layout of development for the particular site

*The L & T/Train Station Redevelopment Plan is inconsistent with the Mountainside Plan. Size, density, height, sightline loss, large buildings on train station lots & design are not appropriate of land considering it’s character.*

## **CONCLUSION**

As set forth herein in detail, the Redevelopment Plan is substantially inconsistent with the Master Plan and ULUC and the Westfield Advocates for Responsible Development requests that the Planning Board determine that the Redevelopment Plan is inconsistent with the Master Plan and ULUC and make appropriate recommendations to the Town Council to require consistency with the Master Plan and ULUC.

/s/ Frank Fusaro  
Frank Fusaro, President  
On behalf of Westfield Advocates for Responsible Development

# **EXHIBIT A**

**Lord and Taylor Prime Site - Summary**

Zone District Criteria	Existing GB2	Proposed	Variance	RA 4 or 5A Zone
Lot Size(aces)	N/A	5.61		5.61
Maximum Building Coverage (%)	40	70	40	65
USES				
Retail/Restaurant	Yes	Yes		No
Office	Yes	Yes		No
Amenity		Yes		No
Residential	No	Yes	Yes	Yes
Total SF	293,245	485,000	191,755	
Maximum Building Height (ft)	3 st-40	6 st - 75	3 st-20	3 st-40
Maximum Density (du/acre)	N/A	38		16-24.6
Rear Yard (feet)	>10' or 1'/2'hgt	10	25	
Side Yard (feet)	>10' or 1'/2' hgt	15-20	25	
Front Yard (feet)	38	35-40		50
Step Backs	N/A	4@10.5@5.5@5 4@10.5@5, 6@15	4@10.5@5.5@5 4@10.5@5, 6@15	N/A

**Lord and Taylor Prime Site- Detail 3 buildings on One Site**

STANDARDS	EAST Building (Obelisk)	CENTER Building	WEST Building (SingleFamily)	Use Minimums	TOTAL (SF)
Lot Size (SF) (5.61 Ac) Building Lot (SF)					244,372 235,000
Max. Bldg Cov (70%) USES	?	50,000	?		171,060
Office		100,000		60,000	100,000
Retail/Rest	*	*	*	10,000	300,000
DwellingUnits (138)	130,000 skyway		170,000 skyway		50,000
Accessory Amenity *retail/rest	*	*	*		
Total Uses SF		150,000			485,000
Max. Story/Height	6 and 75	4 and 75	6 and 75		
Max. Density (DU/Acre)	?	50,000	?		138/3.6=38
Rear Yard (feet)	10	10	10		10
Side Yard (feet)	15	40	20		15-40
Front Yard (feet)	35	40	35		35-40
stepbacks @ sides (feet)	4@10.5@5,5@5	3@20, 4@15	4@10.5@5, 6@200		
stepbacks @ North Ave (feet)	4@10.5@5, 6@15	3@20, 4@15	4@10.5@5, 6@15		

**North Zone Lot 7 Mixed Use Subzone- Summary**

Zone District Criteria	Existing CBD	Proposed Buildings	Variance
Lot Size(acres)	N/A	52,500	
Maximum Building Coverage (%)	N/A	90	
USES			
Retail/Restaurant	Yes	Yes	
Office	Yes	No	
Accessory Parking	Yes	Yes	
Parking Structure	Yes	Yes	
Residential DU	Yes	Yes	
Total SF		82,500	
Maximum Building Height (ft)	3 st @ 40	5 st @ 60	2 st @ 25
Maximum Density (du/acre)	N/A	125	
Rear Yard (feet)	>10' or 1/2 bldghgt	0	
Side Yard (feet)	10	0	
Front Yard (feet)		10	
stepbacks @ sides (feet)	N/A	0	
Step Backs @ North Ave (#/Ft)		5@10	

North Zone Lot 7 Mixed Use/Parking Structure Subzone-Detail			
STANDARDS	Mixed Use Area Sub-zone	Parking Structure	TOTAL (SF)
Lot Size (SF) ***	12,500	40,000	52,500
Building Lot (SF)	12,500	40,000	52,500
Max. Bldg Coverage	12,500	40,000	52,500
USES			
Retail/Restaurant	2,500		2,500
Office	N/A		
Parking	*	40,000	40,000
DwellingUnits (35)	40,000		40,000
Total Uses SF	42,500	40,000	82,500
Max. Story/Height**	5 st and 60	2 st and 55	5 st and 60
Maximum Density (du/acre)	125	N/A	125
Rear Yard (feet)	0	0	0
Interior Yard (feet)	0	0	0
Front Yard (feet)	12	10	10
stepbacks @ sides (feet)	0	0	0
stepbacks @ North Ave (feet)	10	5@10	5@10

\* parking is provided in the proposed public lot

\*\*there is a bonus if the ground floor is > 12 ft height, bldg can be 60 ft

\*\*\*Total lot area is 2.8 acres (121.968 SF), 69,468 SF remains for public space and surfac



South Lot 3 Office/Parking Subzone			
Zone District Criteria	Existing CBD	Proposed	Variance
Lot Size(acres)	N/A	85,000	
Maximum Building Coverage (%)	N/A	90	
USES			
Retail/Restaurant	Yes	Yes	
Office	Yes	Yes	
Accessory Parking		Yes	
Microbreweries			
Total SF			
Maximum Building Height (ft)	3 st @ 40	5 st @ 65	2 st @ 25
Maximum Density (du/acre)	N/A	38	
Rear Yard (feet)	>10' or 1/2 bldghgt	10	
Side Yard (feet)	10	15-20	
Front Yard (feet)		35-40	
Step Backs	N/A		
		3@7-15	

South Lot 3 Office/Parking Subzone			
STANDARDS	Parking Area Sub-zone	OFFICE Sub-zone	TOTAL (SF)
Lot Size (SF)			182,952
Building Lot (SF)	90,000	85,000	175,000
Max. Bldg Coverage	45,000	85,000	130,000
USES			
Retail/Restaurant			
Office		210,000	210,000
Accessory	*		
Parking	*		
Total Uses SF			
Max. Story/Height	2 st and 50	5 st and 65	
Rear Yard (feet)	0	0	10
Interior Yard (feet)	0	25	15-40
Front Yard (feet)	12	15	35-40
stepbacks @ sides (feet)		N/A	
stepbacks @ South Ave (feet)		3@7-15	3@7-15

# **EXHIBIT B**

<p><b>2021 Westfield ULUC - Section</b></p>	<p><b>Page, Statement</b></p>	<p><b>One Westfield Place Redevelopment Plan, Chapter 6, Circulation, Chapter 7, Public Parking - Page, Section, Statement</b></p>	<p><b>Kimley Horn Preliminary Traffic Impact Assessment Memorandum, December 12, 2022, Mitigation Recommendations - Page, Statement</b></p>	<p><b>Comments</b></p>
<p><b>Vision Statement, Guiding Principles &amp; Goals</b></p>	<p><b>18. "...safe connectivity throughout downtown, on North &amp; South Avenue...."</b></p>	<p><b>103. 6.2. Intersection Improvements:</b> "Based on the findings of the PTIS, without implementing mitigation measures, some intersections within the Traffic Study area may be negatively impacted as a result of the development. Consequently, the following measures should be implemented in conjunction with implementation of the development contemplated in this Redevelopment Plan, subject to approval by the appropriate agencies."</p>	<p><b>3, 4, 41. Summary: 29-41. Intersection Analysis Summary</b></p>	<p>All recommended traffic signal timing modifications are subject to NIDOT and/or Union County reviews and approvals. These are short term fixes and can be done now by Westfield's Traffic Engineering Consultant, with easily obtained approvals.</p>
<p><b>Guiding Principles</b></p>	<p><b>19. "We will promote a MultiModal Transportation Network (roadways, bikeways and public transportation) that are safe, accessible...."</b></p>	<p><b>106. Section 6.4. Other Pedestrian and Bicycle Circulation Improvements</b></p>	<p><b>3, 29. Expanded Multi-Use Trail along Route 28</b></p>	<p>Will require NIDOT Coordination and approval. Cost estimates not provided &amp; subject to possible lengthy review times &amp; increases.</p>
<p><b>Overall Goals &amp; Objectives</b></p>	<p><b>20, 6b. Identifying and addressing roadway safety issues; 6c. Promoting traffic calming...."; 7. 6d. Minimizing traffic congestion and providing for safe and convenient access to properties"</b></p>	<p><b>104, 105, 106. Improved high visibility crosswalks, curb extensions, pedestrian signals, bike lanes, covered walkway, 105. Intersection #23: Public Area North Driveway at North Avenue - New driveway for only right turn in/right turn out movements.</b></p>	<p><b>3, 4, 41. Intersection ID #23 - North Avenue &amp; Eastern North Zone Parking Site Driveway</b></p>	<p>Will require NIDOT &amp; Union Co. coordination and approval. Involve new construction. Cost estimates not provided &amp; subject to possible lengthy review times &amp; increases. NJ Admin. Code 16-47-3.8 requires a minimum of 100 ft. driveway setback from signalized intersection. The proposed driveway is only 50 ft. from the Central Ave. intersection.</p>

2021 Westfield ULUC - Section	Page Statement	One Westfield Place Redevelopment Plan, Chapter 6, Circulation, Chapter 7, Public Parking - Page Section, Statement	Kimley Horn Preliminary Traffic Impact Assessment Memorandum, December 12, 2021, Mitigation Recommendations - Page, Statement	Comments
<p><b>Implementation Matrix - Circulation Recommendation Numbers</b></p>	<p><b>27.</b> Investigate new bicycle/pedestrian connection between the Lord &amp; Taylor site and Westfield train station. - <b>Short term</b></p> <p><b>29.</b> Conduct a detailed study of the area around the Westfield traffic circle to investigate feasible options for improving circulation and safety for all travel modes in this area. <b>Short term</b></p> <p><b>32.</b> Investigate the feasibility of introducing a local jitney/shuttle service that would provide an alternative travel option in and near the downtown area. <b>Short term</b></p> <p><b>35, 36. Coordinate with NHDOT/Union Co.</b> to review &amp; update traffic signal timings throughout Town; Upgrade traffic signals roadside to include pedestrian countdown heads with automatic WALK signals. <b>Medium term</b></p> <p><b>37.</b> Coordinate with Union Co. to advance Signal Warrant Analysis at two intersections along E. Broad St.; (CR 509): Prospect St. and E. Chestnut St. <b>Short term</b></p> <p><b>38.</b> Conduct further study of potential options for a road diet on South Ave. (CR 610) between Central Ave. (CR613) and the traffic circle.... <b>Short term</b></p>	<p><b>107.</b> Safer and more accessible pedestrian crossings throughout the Redevelopment Plan Area, including a new potential elevated pedestrian crossing across Route 28.</p> <p><b>103, 6.2. Intersection Improvements:</b> Intersection #3: Route 28 &amp; South Avenue - "Evaluate improvements to the circulation patterns of the existing Westfield Circle in consultation with state, local, or other reviewing agencies and implement if deemed necessary."</p> <p><b>106.</b> "For projects creating buildings with more than 50 ksf GFA of combined Office or Medical Office, a Transportation Demand Management (TDM) plan shall be prepared and submitted to the Town....."</p> <p><b>103, 104, 105.</b> Modify signal timings; Intersections # 1, 4, 7, 8, 12, 13. Provide pedestrian warning flashing beacons; upgrade &amp; provide new pedestrian signals; Intersections #11, 12, 13.</p>	<p>New Pedestrian Bridge not included in this Memorandum.</p> <p>Not included in Page 3, Page 29, Analysis Alternative (will require NHDOT coordination and approval). However, changes to the current layout may not be feasible and will require further discussion with NHDOT.</p> <p>TDM plan not included in this Memorandum</p> <p>4</p> <p><b>4, 38.</b></p>	<p>Will require NHDOT Coordination and approval. Cost estimates not provided &amp; subject to possible lengthy review times &amp; increases.</p> <p>Will require NHDOT Coordination and approval. Cost estimates not provided &amp; subject to possible lengthy review times &amp; increases. LOS E now, F with Redevelopment Plan traffic.</p> <p>This is a short term recommendation, not linked to the proposed development which is longer term.</p> <p>New pedestrian signals will require NHDOT, Union Co. review &amp; approval. Cost estimates not provided &amp; subject to possible lengthy review times &amp; increases.</p> <p>The Crash Hotspot location table on page 51 of the 2021 ULUC did not include this intersection. Figure 1 on page 48 did not show a congestion problem here, while the K &amp; H LOS analyses showed the northbound Prospect St. approach to be LOS E and F in weekday AM &amp; PM peak hours. A new traffic signal will require NHDOT review &amp; approval. Cost estimates not provided &amp; subject to possible lengthy review times &amp; increases.</p> <p><b>2021 ULUC recommendation is short term, but plan requires westbound right lane for parallel parking for new retail.</b></p>
<p><b>Implementation Matrix - Parking Recommendation Numbers</b></p>	<p><b>42.</b> Amend existing parking requirements for the CBD zone to reflect the recommended ratios found in Appendix B. <b>Short to medium term.</b> Appendix B, Page 122. Recommended Parking Requirements - Commercial, Professional Office, Business/Administrative Office - 4.0 &amp; 3.0 spaces/1,000 KSF</p>	<p><b>109, 7.2. Replacement of Public Parking.</b> Total existing public parking spaces = 801 in Lots 2, 3, and 8. Page 110. Estimated Redevelopment Zone Public Parking Spaces = 696, a deficit of 105 public parking spaces.</p>	<p><b>12.</b> "Per Town staff, it is intended that the number of commuter parking spaces in the North Zone and South Zone will be replaced one-for-one within the Town."</p>	<p>Proposed South Zone 210 KSF office parking spaces = 525. Assuming 30/7,000, 630 spaces are required under 2021 ULUC recommendation, a shortage of 105 office parking spaces. Added to the deficit of 105 public parking spaces, the plan provides 210 less parking spaces than required. However, 35 public parking spaces in the North Zone parking structure are proposed to be reserved for apartment tenants.</p>

# **EXHIBIT C**

## ASSESSMENT OF ONE WESTFIELD PLACE PARKING DEFICIENCIES

EXISTING PERTINENT PARKING LOTS					
	Commuters	Employees	Shoppers	TOTAL SPACES	
<b>NORTHSIDE</b>					
LOT 2 (Around Christmas Tree)	0	0	71	71	
LOT 8 (Northside Behind Limani, Adlers, & Verizon)	75	106	0	181	
SUB-TOTAL	75	106	71	252	
<b>SOUTHSIDE</b>					
LOT 3 (Southside of Train Station)	549	0	0	549	
TOTAL	624	106	71	801	
<b>POST-DEVELOPMENT - PARKING CAPACITY</b>					
<b>NORTHSIDE</b>					
NEW NORTHSIDE PARKING GARAGE	248	37	0		
LOT 2 (Around Christmas Tree)	0	2	5		
LOT 8 (Northside Behind Limani & Adlers)	0	0	68		
SUB-TOTAL	248	39	73	360	
<b>SOUTHSIDE</b>					
LOT 3 (Southside of Train Station, Reduced)	93	0	0		
NEW SOUTHSIDE PARKING GARAGE	208	0	0		
SUB-TOTAL	301	0	0	301	
TOTAL	549	39	73	661	
LOST SPACES	75	67	-2	140	

**a** (35) Spaces are reserved for the Residential Tenants in the adjacent New Building

**b** The first existing lane of Parking remains, **minus** the access needed for Loading/Unloading @ the (2) new Office Buildings. The conflict between delivery trucks and commuters parking their cars in this shared lot is a **safety concern**.

**c** The relocation of this shopper parking moves the spaces **further away** from the stores

#### ADDITIONAL NOTES

Parking Lot #4 (behind Baron's) already exists, and should **not** be counted in new capacity

The on-street spaces once designated for Employees on Orchard & Elm already exist, and should **not** be counted as new

Parking Lot #6 (across from Holy Trinity School) already exists for commuters, and should **not** be counted in new capacity

The TNC **Subsidy** Program can be implemented @ any time, and should **not** be counted in this analysis. Paying people to use LYFT/UBER should be weigh against other alternatives