MUNICIPALITY OF PRINCETON
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MEMORANDUM

To: Princeton Planning Board
From: Nathan Foote, AICP, PP
Date: May 1st, 2026
Subject: **Application of Toll NJ I, LLC**
Preliminary and Final Major Site Development
29 Thanet Circle
Block 5502, Lot 5, Zone AH-14
File # P2525-712P

Toll NJ I, LLC ("the applicant" or "Toll") has filed an application for preliminary and final major site development approval to remove the existing improvements on the subject property and redevelop it with a residential townhouse development consisting of 85 units, including 17 affordable units. The development is part of Princeton's Fourth Round Fair Share Plan.

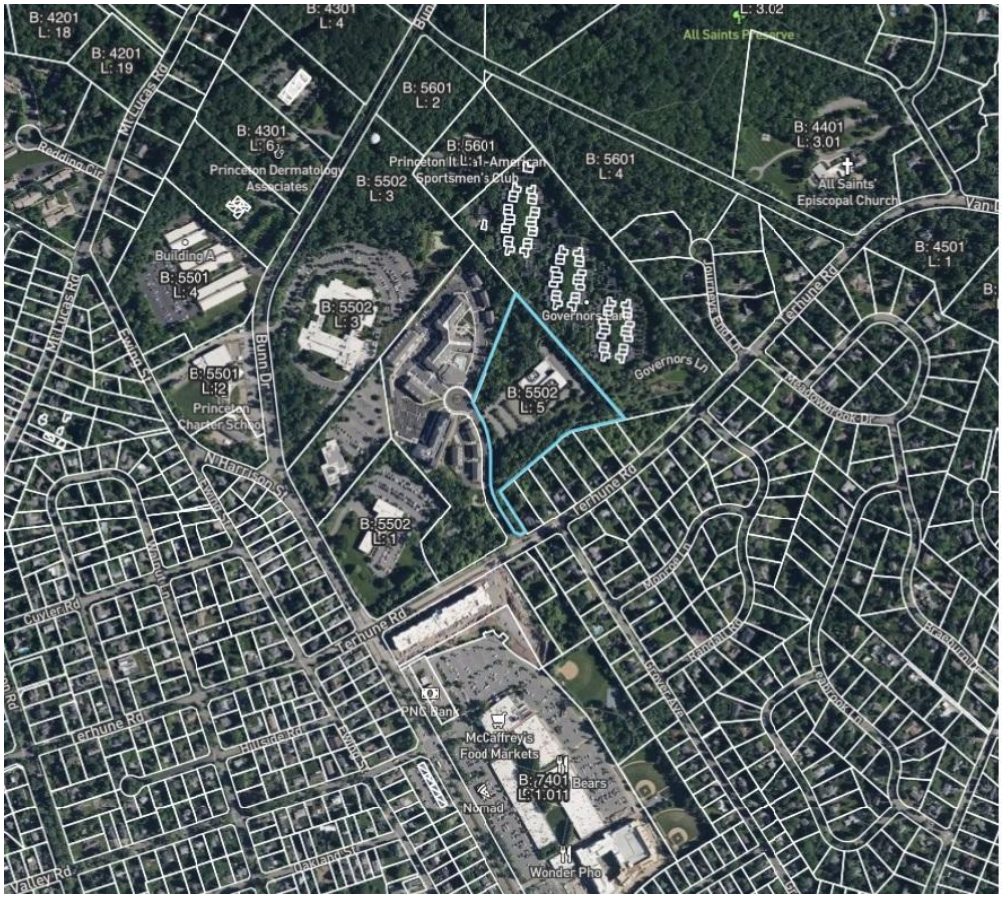
Subject Property and Surrounding Area

The subject property is an irregularly-shaped lot identified as 29 Thanet Circle, and as Block 5502 Lot 5 in the municipality's tax maps. The property has frontage along Thanet Circle, although a portion of the lot stretches along Thanet Circle toward Terhune Road. It is currently developed with a multi-story masonry building with a 30,256 square foot (sf) footprint, access drives, and parking lots. The masonry building is vacant and was previously utilized as an office building. The property is located in the AH-14 Affordable Housing 14 zone, and regulated by §T10B-272.120 and 121. The AH-14 zone was established by Ordinance 2025-15, and adopted by Princeton Council on September 8, 2025. The zone, and development of the site, was directly called for in the municipality's Fourth Round Housing Element and Fair Share Plan ("Fourth Round HEFSP"). It is intended to provide a minimum of 17 affordable housing units.

According to the ALTA/NSPS Land Title Survey of the subject property submitted with the application, the property is subject to multiple easements: three conservation easements, a stream cleaning easement, a drainage easement, a storm drainage easement, a sewer easement, and multiple Public Service Electric and Gas Company easements. The survey indicates wetlands and special flood hazard areas on the property as well. The survey also indicates a "possible overlap" with Block 5502 Lot 6; while this portion of the property is not being developed this overlap should be clarified. The site plan also indicates that about 53,200 sf of the property has a slope of at least 15.00%, accounting for 29.86% of the site. Much of the conservation easement area and steeper slope area is related to an "unnamed tributary" running through the center of the property.

The property is adjacent to the IRA Inclusionary Rental Apartment district, which is developed with the Avalon Princeton Circle apartment building, and the RSA Residential Senior Affordable district, which is developed with the Princeton Senior Living senior affordable apartment building. The Governor's Lane multifamily housing neighborhood in the OR-2 Office Research 2 district of the former Township is located to the east. Several single-family houses fronting Terhune Road in the R-5 Residential zone of the former Township are located to the south. The overhead image below shows the subject property

highlighted in blue with the surrounding area.



Overhead image of subject property (highlighted in light blue) and the surrounding area.
Image from: NJ Parcel Explorer created by Rowan University (accessed March 12, 2026)

Summary of Application

The applicant proposes to demolish and remove the existing improvements on the property and construct 10 residential buildings, labeled A through J on the plans. Buildings A and B will both have footprints of 2,335 sf and will provide 4 residential units each. Building C will have a footprint of 7,871 sf and will provide 14 units. Building D and I are proposed to have 6,764 sf footprints and will provide 12 units each. Buildings E and F will both have 3,442 sf footprints and provide 6 units each. Buildings G and H are proposed to provide the deed-restricted affordable housing units: Building G will have a 4,410 sf footprint and provide 10 residential units, while the footprint of Building H will be 2,760 sf and will provide 7 units. Finally, Building J will have a 5,656 sf footprint and provide 10 residential units. All units will have HVAC, and there will be an exterior condenser unit for each residence outside of the building.

The architectural plans submitted for review only include "schematic design" elevations and floor plans for three buildings, including Buildings G and H (the affordable units buildings) and what appears to be the 14-unit market-rate building. The façade treatments of all the buildings in the plans include brick, horizontal siding, and cementitious panels. Metal awnings are proposed over front entrances, and balconies are proposed on the rear façades. The floor plans for the market-rate units show just one set of two stacked townhouses, identified as "Veery/Harrier" (or "lower") and "Meadowlark" (or "upper").

The first floor provides a two-car tandem garage, foyer, and bike space for both units. The second floor provides an open-space kitchen, great room, and casual dining area; deck; hall bath; laundry closet; and bedroom for the "Veery" unit. The third floor provides the primary bedroom with attached bathroom and walk-in closet for the "Veery" unit, while also providing the open concept kitchen, great room, casual dining, and deck for the "Meadowlark" unit. The fourth floor provides two bedrooms, hall bath, laundry closet, mechanical room, and primary bedroom with attached bathroom and walk-in closet for the "Meadowlark" unit.

The floor plans for Building G show that the building provides 1 one-bedroom unit, 5 two-bedroom units, and 4 three-bedroom units, and is separated into three segments, identified as Types V-A, IV, and II. The first floor of Type V-A provides two one-car garages (for Units A and B, which also provide space for garbage cans and bike spaces), bike spaces for Units C and D and the two-bedroom Unit A (which only occupies the first floor). The second floor is occupied by the majority of the three-bedroom Unit B (including two bedrooms and the common areas) and the common areas of the two-bedroom Unit C. The third floor provides the third bedroom of Unit B, the two bedrooms of Unit C, and the entirety of the two-bedroom Unit D. The Type IV floor plans indicate that the first floor is proposed to provide two one-car garages (for Units A and B), bike spaces for all three units in IV-A, garbage can storage for all three units, and most of the space for the two-bedroom Unit A. The second floor provides space for the second bedroom of Unit A, along with the entirety of the two-bedroom Unit C. The third floor provides the entirety of the three-bedroom Unit B. The Type II section floor plans also indicate two one-car garages, bike spaces for all three units in Type II, garbage can storage areas for all three units, and the entirety of the one-bedroom Unit A. The second floor provides the entirety of the three-bedroom Unit C, while the third floor provides the entirety of the three-bedroom Unit B.

The floor plans for Building H show that the building is separated into two segments, identified as Types III and V-B. The first floor of Type V-B provides two one-car garages (one each for Units A and B), bike spaces, and areas for garbage cans, and the entirety of the one-bedroom Unit A. The second floor provides the entirety of the two-bedroom Unit C and the common areas (kitchen and dining/living room) for the one-bedroom Unit D. The third floor provides one bedroom and one bathroom for Unit D, and the entirety of the two-bedroom Unit B.

Access to and from the site is provided by two two-way driveways off of Thanet Circle. Drive aisles are provided to the rear of each of the 10 proposed buildings in order to provide access to the garages. The driveways and drive aisles will be a mix of standard duty asphalt pavement and pervious pavement. Concrete sidewalks are proposed around the buildings and along the driveways closest to the front of the property. Pedestrian connection between the front and rear of the property will be provided by an existing concrete bridge over the unnamed tributary that is proposed to remain.

According to the site plan, there will be 146 parking spaces provided in garages and 40 surface parking spaces. The schematic design floor plans indicate that each market-rate unit will have a two-car garage on the first floor of the building, for a total of 136 spaces. Building G will provide 6 garage spaces, while Building H will provide 4 garage spaces. The majority of the surface parking spaces (28 of the 40) are in the rear of the site, near Buildings G, H, I and J. The remaining 12 are largely located near Buildings C and D. Six of the proposed surface parking spaces are proposed to be electric vehicle spaces, while 2 are proposed as ADA accessible parking spaces. The applicant proposes two external bike racks, one toward the front of the property and the other to the rear near a proposed fenced-in playground. The bike racks provide 18 bike parking spaces each, for a total of 36. The site plan notes that there is internal bike parking for each residential unit.

Applicant proposes 6 stormwater basins, including one bio-retention basin near the front of the property and 5 other basins all shown under pervious pavement of the driveways/drive aisles. A total of 6 transformers are proposed throughout the site, including 3 near Building J, 1 near Building A, and 2

south of the main driveway. A hotbox is also proposed near the Thanet Circle frontage.

As noted previously, there is an enclosed playground proposed near the rear of the property. There is a small plaza proposed outside of Building D, and a paver area with benches between Buildings G and H. An amenity seating area is also proposed off of the southern driveway, near the Thanet Circle frontage. Two mailboxes are proposed, one near Building D in the front of the property, and the other in the rear of the property just outside of Building H. Applicant proposes a "monument sign" next to the southern driveway. This sign (as shown on sheet 24) is designed with an over 8 foot column base from which a projecting sign of 10 sf is hung.

Applicant proposes to remove 180 existing trees, and proposes to plant a total of 199 trees. The new trees include 53 shade trees (including 4 in the bioretention basin), 41 ornamental trees, and 105 evergreen trees. Applicant also proposes 68 evergreen shrubs and 323 deciduous shrubs (including 105 in the bioretention basin). The site plan indicates "NJBMP Standard Basin Planting Design" for the bioretention basin. "Typical" foundation plantings are also identified on the site plan.

Staff Comments

1. Master Plan Consistency

    a. This application is generally consistent with the Princeton Master Plan.

    b. A project providing 17 affordable housing units at this site is called for in Princeton's Fourth Round HEFSP. One of the key findings from community input in the Introduction section of the plan is that Princeton needs more housing, especially at lower price points. The Vision statement includes that Princeton will have "housing ample and diverse enough to accommodate all who want to live here" and the Princeton of the future will be "affordable to households of all income levels."

    c. A Land Use goal of the plan is to enhance the existing pattern of land use, particularly by strengthening mixed-use centers like the area near the Princeton Shopping Center. The proposed project will be easily accessible to the Shopping Center through new improvements on Terhune Road and with the creation of a new road between The Alice apartment building and an approved multifamily development at 375 Terhune Road.

    d. The Mobility goals of the plan include reducing inbound commuting through the development of additional housing in areas where jobs are located and encouraging shifts from single-occupancy vehicle travel to low- or zero-emissions mobility options such as walking, cycling, and transit. Utility Goals and Natural Resource Conservation Goals such as accommodating future growth while minimizing adverse impacts to the natural environment are supported by repurposing an already developed but vacant parcel.

2. Affordable Housing and UHAC

    a. Per the Uniform Housing Affordability Controls (UHAC, N.J.A.C. 5:80-26.4(e)) restricted units must be structured such that:

        i. At a minimum, the number of bedrooms equals twice the number of restricted units. **A total of 35 bedrooms are proposed across the 17 restricted units; this complies.**

        ii. Two-bedroom and three-bedroom units compose at least 50% of all restricted units. **A total of 14 restricted units are two- or three-bedroom units, amounting to over 82%; this complies.**

        iii. No more than 20% of all restricted units, rounded up or down to the nearest whole

number in either direction, are efficiency or one-bedroom units. **Only three one-bedroom units are proposed, amounting to 17.6%; this complies.**

iv. At least 30% of all restricted units, rounded up or down to the nearest whole number in either direction, are two-bedroom units. **There are 10 two-bedroom units, equaling 58.8% of restricted units; this complies.**

v. At least 20% of all restricted units, rounded up or down to the nearest whole number in either direction, are three-bedroom units. **There are four three-bedroom units, equaling 23.5% of the restricted units; this complies.**

b. The application documents and plans do not specify the number of very low income, low income, and moderate income restricted units. Per UHAC (N.J.A.C. 5:80-26.4(g)), the following is noted, should be agreed to by the applicant, and added to the plans:

i. At least 50% of all restricted units are low-income or very low-income units. **With 17 units, at least nine (9) will need to be low-income or very-low income units.**

ii. At least 50% of all restricted efficiency or one-bedroom units, rounded up or down to the nearest whole number in either direction, are low-income units or very-low-income units. **With three (3) one-bedroom units, at least one (1) must be a low-income or very-low-income unit, noting however, that with the two- and three-bedroom counts below, the total must add up to nine noted above.**

iii. At least 50% of all restricted two-bedroom units, rounded up or down to the nearest whole number in either direction, are low-income units or very-low-income units. **With 10 two-bedroom units, at least five (5) must be low-income or very-low-income units.**

iv. At least 50% of all restricted three-bedroom units are low-income units or very-low-income units. **With four (4) three-bedroom units, at least two (2) must be low-income or very-low-income units.**

v. At least 50% of all restricted units with four or more bedrooms, rounded up or down to the nearest whole number in either direction, are low-income units or very-low-income units. **Not applicable to this development.**

vi. Any very-low income units are distributed between each bedroom count as proportionally as possible, to the nearest whole unit, to the total number of restricted units within each bedroom count. For example, if half of the restricted units are two-bedroom units, then half of the very-low income units should be two-bedroom units. **Applicant should confirm they will comply with this requirement; it is recommended that all unit restriction counts be confirmed with municipal staff and added to the plans.**

c. Per UHAC (N.J.A.C. 5:80-26.5(a)3), regarding for-sale restricted units, the following is noted:

i. Restricted units must use the same building standards as market-rate units of the same unit type, except that restricted units and market-rate units may use different interior finishes. **The building standards appear to be the same between the market-rate and affordable units. Applicant shall confirm this.**

ii. Restricted units may be clustered, provided that the buildings or housing product types containing the restricted units are integrated throughout the development and are not concentrated in an undesirable location or in undesirable locations. **The affordable units are concentrated in Buildings G and H of the development. While clustered, the units are not separated from the rest of the development. Applicant should discuss the possibility of moving one of the affordable building to a different**

location of the site to increase the integration of the units into the development. Applicant shall also demonstrate how this location is not undesirable.

iii. Restricted units may be of different housing product types than market-rate units, provided that developments containing market-rate duplexes, townhomes, and/or single-family homes offer restricted housing options that also include duplexes, townhomes, and/or single-family homes. **The affordable units proposed are different from the market-rate units in that they are not ''stacked'' in the same way as the market-rate townhouse units. Applicant should demonstrate how the affordable and market-rate units are both stacked townhouse units.**

iv. Restricted units must meet the minimum square footage required for the number of inhabitants for which the unit is marketed and the minimum square footage required for each bedroom, as set forth in the Neighborhood Preservation Balanced Housing rules at N.J.A.C. 5:43-2.4. **The NPBH rules do not appear to provide square footage requirements based on number of inhabitants. Based on the size requirements for rental units (90% of that required for each type of bedroom count under NPBH):**

i. For one bedroom units: 540 sf, not counting exterior hallways, garages, common space and unfinished space.

ii. For two-bedroom units: 765 sf, not counting exterior hallways, garages, common space and unfinished space.

iii. For three-bedroom units: 1,035 sf, not counting exterior hallways, garages, common space and unfinished space.

iv. Based on the square footage shown on the architectural plans, the sizes of all affordable units comply; however, applicant shall confirm that the square footage does not include unfinished spaces or garages.

v. For bedroom size compliance, applicant should be prepared to demonstrate compliance with the standard at the Board hearing.

v. Penthouse and end units may be reserved for market-rate sale, provided that the overall number, value, and distribution of affordable units across the development is not negatively impacted by such reservation(s). **Not applicable to this development, but noted for reference.**

vi. Residents of restricted units must be offered the same access to communal amenities as residents of market-rate units within the same affordable development. **There is nothing indicating that residents of the affordable units would not be able to use the communal outdoor amenities (the playground, benches, small plazas, etc.). Applicant shall confirm this and provide deed restrictions for the affordable units to show compliance.**

vii. Each bedroom in each restricted unit must have at least one window. **The floor plans indicate that all affordable unit bedrooms have at least one window.**

viii. Restricted units must include adequate air conditioning and heating. **An adequate number of air conditioning condensers are shown outside Buildings G and H. Applicant shall confirm heating for all affordable units.**

d. As a condition of approval, applicant should submit drafts of the deed restrictions for the affordable units for staff and attorney review.

e. Applicant shall clarify if the construction will proceed in phases. If it will, UHAC (N.J.A.C. 5:80-26.5(a)4) will be applicable, requiring a certain percentage of affordable units to be completed with each phase.

f. The affordability restriction must be in place for a minimum of 30 years for ownership units per N.J.A.C. 5:80-26.6(a)1.

3. Architectural Plans

a. The architectural plans only provide the elevations and floor plans for three of the ten buildings, those for what appear to be Building C (the 14-unit market rate building near the frontage of Thanet Circle), and the two affordable unit buildings (Buildings G and H). Applicant should confirm that the façade treatments for the remaining seven market-rate buildings will be the same as those shown in the architectural plans submitted for review, and that the floor plans for the remaining seven market-rate buildings will be the same as those shown in the plans (although in different numbers for each building). It is also recommended that the applicant submit architectural plans showing all proposed buildings for approval and signature during Resolution compliance.

b. The layout of the units in the two affordable buildings is unusual. Single bedrooms are provided on separate floors, requiring internal staircases and creating an area surrounded by a different unit. Applicant should testify as to how and why this arrangement was created.

c. The proposed façade treatments include brick. Applicant should confirm if this is actual brick or brick veneer.

d. The proposed façade treatments include horizontal siding, but does not identify the material. Applicant should clarify what material is proposed (vinyl, fiber cement, etc.).

e. All units, affordable and market-rate, have private decks, with the exceptions of Unit C in the Type V-A bay of Building G and Unit D in the Type V-B bay of Building H. The two affordable units identified do have Juliet-style balconies but only regular doors opening to them. Applicant and Board should discuss if it is feasible and desirable to have doors across the span of the Juliet balconies to allow a wider opening.

f. The floor plans show that every unit will have space in their garages for trash and recycling bins, with the exception of seven affordable units (four in Building G and three in Building H). For these seven units, residents will have to exit their building out the front and then walk around at least one corner of the building to access their trash and recycling bins in their storage areas. Applicant should discuss alternative arrangements to provide easier access to these areas for the residents.

g. Laundry rooms are not identified for every affordable unit. Applicant shall clarify if every unit will have a laundry room with washer/dryer. It is recommended that the plans be updated to identify laundry rooms/closets for every affordable unit.

h. Patios for first floor affordable units are identified on the architectural plans, but they are not clearly demarcated on the site plan. Applicant should clarify how the patio areas are differentiated from the sidewalks.

4. Engineering and Zoning, including Stormwater Management

a. The Acting Land Use Engineer, Zoning Officer, and Assistant Zoning Officer provided a joint "Engineering and Zoning Memo". The May 1, 2026 Engineering and Zoning Memo is attached for reference. Applicant should address the issues raised in the Memo during testimony.

b. As noted in the Engineering and Zoning Memo, the Board's consulting stormwater engineer, Mr. Joe Skupien, PE, has provided a memo with his comments. The "Skupien Memo", dated April 30, 2026, is attached for reference. Applicant should address issues brought up in the

Skupien Memo.

5. Parking and Circulation

   a. The Board's consulting traffic engineer, Mr. Victor Anosike, PE, PTOE, has provided a review memo dated April 4, 2026 ("Anosike Memo"). The Anosike Memo is attached for reference. Applicant should address the issues raised in the Anosike Memo during testimony.

   b. Seven affordable units of 17 total do not have garages. It is recommended that designated surface parking spaces be provided for these units, and that these be identified on the site plan. Signs or pavement markings would be needed to identify these spaces and ensure they are not used by others.

   c. The Anosike Memo and the Engineering and Zoning Memo raise issues and questions related to bicycle parking. Per the architectural plans, each unit has an interior space for long-term parking. Most of these are in the proposed garages. Examples of how bikes will be parked within the spaces (especially the affordable units without garage spaces) should be provided.

   d. A detail of the proposed exterior bike rack is provided on sheet 24 of the site plan set. It is unclear how 18 bikes will be parked at this rack. This should be clarified during testimony. The Anosike Memo also raises the issue of distribution of these short-term spaces. This should be addressed.

   e. Applicant should address if there is enough surface parking toward the front of the site as compared to the rear, especially for visitors to the site.

   f. The bridge across the Unnamed Tributary narrows to 19.6 feet wide. Applicant should address if this is enough space for two-way traffic to safely pass over.

   g. The applicant should explore a pedestrian passageway to Governor's Lane and/or Avalon Princeton Circle. If the adjacent HOA and/or management is in agreement, the applicant can construct it in consultation with staff with the Board's consent, rather than returning for a modification of site plan.

   h. Electric vehicle charging stations are proposed at surface parking spaces. Applicant should clarify how many will be "make-ready" and how many will be installed during construction. While it is not required, it is recommended that all chargers be installed during construction. Applicant should also clarify if suitable electrical outlets for EV charging will be provided in all garages. It is recommended that such outlets be provided in the garages.

6. Landscaping

   a. The Shade Tree Commission provided a memo dated April 1, 2026. This "STC Memo" indicated that the number of replacement trees originally proposed by the applicant (198) was not accurate and that 204 replacement trees were actually needed. The applicant did update the site plan with what appears to be one tree (199 trees total). However, sheet 17 of the site plan indicates 204 trees required, with a "complying" 202 proposed. These discrepancies should be addressed by the applicant to provide the 204 trees.

   b. The Board's consulting landscape architect, Mr. Dan Dobromilsky, LLA, PP, LTE, provided a memo dated March 31, 2026, which is attached to this Memo for reference. The "Dobromilsky Memo" identified issues with plantings and site furniture. It is recommended that Mr. Dobromilsky's final approval of the landscaping plan be made a condition of approval.

   c. The site plan indicates "NJBMP Standard Basin Planting Design" for the bioretention basin.

Applicant shall clarify if this is consistent with the "Bio-Retention Basin Landscape Schedule" found on sheet 16.

d. The site plan on sheet 17 identified typical planting designs around the buildings. Applicant should clarify how these would be modified for the different buildings.

7. Environmental Considerations

a. The Princeton Environmental Commission (PEC) provided a memo dated March 25, 2026, which is attached to this Memo for reference. This "PEC Memo" raised several issues and questions that I reiterate and the applicant should address:

i. Roofing should be made solar-ready.

ii. Follow construction standards such as LEED (v5 BD+C for midrise multifamily).

iii. Provide and maintain spaces for a community garden. This seems especially important given the minimal, if not non-existent, private open space.

iv. Maximize use of operable windows for natural ventilation, including possibly providing for a different type of window than double-hung.

b. The Engineering and Zoning Memo also raises issues and recommendations related to the tributary to Harrys Brook that applicant should address.

8. Trash and Recycling

a. As also noted in the Engineering and Zoning Memo, applicant should identify where trash and recycling bins will be placed for trash or recycling truck pick-up.

b. The choice to use individual trash and recycling bins (instead of community dumpsters) leads to a trash or recycling truck moving through the site and collecting 85 individual bins. Is the applicant utilizing a private or public hauler? Have they discussed the trash pick-up arrangements with the hauler? What will be the frequency of the pick-ups?

Municipal Reports

Engineering and Zoning Report, May 1, 2026, *J. Purcell, D. Bridger, T. Gribbin*
Stormwater Report, April 30, 2026, *J. Skupien*
Traffic Engineering Review, April 4, 2026, *V. Anosike*
Princeton Shade Tree Commission Review, April 1, 2026
Landscape Architecture Report, March 31, 2026, *D. Dobromilsky*
Princeton Environmental Commission Report, March 25, 2026, *A. Soos*

cc: Applicant c/o Christopher Tarr, Esq.
V. Anosike, Traffic Engineering consultant
T. Gribbin, Zoning Officer
D. Dobromilsky, Landscape Architecture consultant
G. Muller, Planning Board Attorney
D. Battle, Planning Department Coordinator
J. Purcell, Acting Land Use Engineer

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MEMORANDUM

To: Planning Board of Princeton
From: James J. Purcell, *Land Use Engineer*
Derek Bridger, *Zoning Officer*
Taylor Gribbin, *Assistant Zoning Officer*
Subject: Application of Toll NJ I, LLC
29 Thanet Circle Major Site Development
Block 5502, Lot 5, Zone AH-14
Docket # P2525-712P
Date: April 30, 2026

An application has been filed with the Planning Board of Princeton by Toll NJ I, LLC (the applicant) for preliminary and final major site plan approval for development of the property at 29 Thanet Circle. The proposed development includes 85 residential units in ten buildings. The development will include amenities for the residents of the complex, including a playground.

1.0 EXISTING SITE

The subject site is identified as Lot 5, Block 5502 and is located on Thanet Circle, off Terhune Road in the vicinity of Harrison Street and Grover Avenue. The site currently consists of a vacant office building and associated surface parking lots. The subject lot contains a total of 9.249 acres. The site is located in Affordable Housing-14 (AH-14) Zoning District, with regulations and requirements in code section T10B-272.120. The site is bordered to the northeast by Governor's Lane; to the southeast by Terhune Road; to the northwest by Avalon Princeton Circle and to the southwest by Thanet Circle and Princeton Senior Living and the Townhomes at Avalon Princeton Circle.

2.0 PROPOSED SITE PLAN

The existing office building will be demolished. The applicant is proposing to construct ten buildings containing 85 residential units. The building types consist of townhouses and stacked townhouses. A minimum of 17 units (20%) will be affordable. The affordable units are located within the interior of the lot. The market rate units are located along Thanet Circle and along the rear lot line. The applicant is offering a total of 186 parking spaces consisting of 146 garage parking spaces and 40 surface parking spaces. Six EV charging spaces are proposed. Two ADA parking spaces are proposed. Long Term bike parking is provided in each unit. Fifty-four short-term bike parking spaces are proposed. Site improvements include 9 seating benches, a playground and a seating area. Access to the complex will be from Thanet Circle.

3.0 LAND USE and ZONING CODE REQUIREMENTS

The subject property is located within the zone T10B-272.120 known as AH-14 Zone. This is an affordable housing zone that requires a 20% set aside with a minimum requirement of 17 units. The project complies with the applicable zoning requirements.

4.0 REVIEW IN ACCORDANCE WITH CRITERIA SET FORTH IN SECTION 10B-226

(a) Ecological Considerations

The proposed development utilizes the footprint of the existing office building and parking lot. The northern portion of the lot is comprised of wetlands, a stream cleaning easement, and a conservation easement containing a tributary to Harry's Brook that bisects the lot from north to south. A pedestrian and vehicular bridge span the tributary. The southern section of the lot features conservation easements, wetlands, and a sanitary sewer easement. The proposed development proposes six porous pavement stormwater management basins and modification of the existing detention basin into a naturalized bio retention basin.

(b) Landscape

Staff defer to the Municipality's landscape design consultant, Dan Dobromilsky & Associates, who offer several comments for consideration.

(c) Relation of Proposed Structures to the Environment

The existing site is commercial in nature. The adjoining lots to the northeast (Governors Lane), the north (Avalon Princeton Circle) and west (Princeton Senior Living and Avalon Townhomes) are all comprised of residential multi-family and townhouse developments. The proposed project fits in with the scale of the other developments. The proposed structures do not appear to have an adverse impact upon the surrounding area.

(d) Scenic, Historical, Archaeological, and Landmark Sites

The proposed improvements are not located within an historic district and are not known to be on a site of scenic, archaeological, or landmark significance.

(e) Surface Water Drainage

The storm water management design has been reviewed by the municipal storm water management consultant, SWM, and staff defers to that report. The storm water management design will also be subject to review and approval of the Delaware and Raritan Canal Commission, and the NJDEP (for a General Stormwater Permit for Construction Activity). Soil erosion and sediment control will be subject to review by the Mercer County Soil Conservation District.

Additional Staff Comments:

1. **As noted in the report from SWM, the bio-retention basin will be treating 1.9 acres of the property and will further convey an additional 0.8 acres of the property that will have been treated by the porous pavement systems. Clarification will need to be sought from NJDEP as to whether the 0.2-acre exceedance in drainage area above the maximum 2.5-acre drainage area limit for small-scale green infrastructure is acceptable. SWM and staff support such a determination.**
2. **The applicant has not provided a Stormwater Management Facilities Operation & Maintenance Manual, which is required to be filed with the Municipality.**

(f) Driveway Connections to Public Streets

The property is currently accessed via driveways from Thanet Circle and will continue to be under the redeveloped condition.

(g) Traffic Effects

Staff defer to the Municipality's traffic engineering consultant, Bowman Associates.

(h) Pedestrian and Bicycle Safety

Pedestrian safety is addressed by providing sidewalks and walking paths throughout the development. Marked crosswalks are provided across drive aisles between buildings, however there is only one crosswalk provided across the main driveway. Pedestrian pathways to the playground are not well-defined and no crosswalks are provided between the residential buildings and this site amenity that will be used by children. Furthermore, the applicant has not addressed bicycle safety or circulation. Thanet Circle is a bicycle boulevard that connects to a network of bicycle facilities throughout Princeton; the on-site connectivity to this network should be addressed.

Staff Comments:

1. **The applicant should address how children will safely access the playground.**
2. **The applicant should address bicycle safety and circulation and how the development connects to the municipal bicycle network in a safe manner.**

(i) On-Site Parking and Circulation

On-site parking is comprised of a combination of garage and surface parking. The applicant has demonstrated compliance with the parking requirements under Section T10B-282 where two parking spaces are required for every dwelling unit with 2 or more bedrooms. Under this Section, 170 parking spaces are required and 186 are provided. In addition, the AH-14 parking requirements are that there should be one parking space for each unit with one or two bedrooms and two for units with three or more bedrooms, plus 0.35 spaces for each unit for visitor parking. The application complies with this provision, as well. In addition, four electric vehicle parking spaces are provided.

The buildings containing the market rate units include two stacked garage spaces for each unit. The two affordable buildings, Building G with ten affordable units and Building H with seven affordable units, include six garage parking spaces and four garage parking spaces, respectively. In total, there are 146 garage parking spaces and 40 surface parking spaces.

Two ADA-compliant parking spaces are provided within the surface parking, which complies with the requirement for number of parking spaces. Parking spaces that serve a particular building are required to be located on the shortest accessible route from parking to an accessible entrance, however, and the location of the spaces does not appear to comply with this provision of the ADA (Section 208.3).

The bike parking ordinance requires 1.6 spaces per bedroom and 80 % of the bike parking spaces must be long term and 20% be short term. Long Term bike parking is provided within each unit. The required bike parking for the site is 128 spaces. The long-term requirement is 102 spaces, and the short-term requirement is 26 spaces. The architectural plans reflect a parking space in each unit, however there are 85 units, and 102 long-term spaces are required. 54 Short term bicycle parking spaces are located in three areas and do not appear to be “reasonably accessible, within a reasonable distance from the entrance to the use they are intended to serve, and appropriately lit.”

Staff Comments:

1. **The applicant should advise if the affordable units without garage parking have designated parking within the nearby surface parking spaces and as noted in the Bowman memo provide rationale for the surface parking distribution.**
2. **The applicant should address the location of the accessible parking spaces in terms of compliance with ADA Section 208.3.**
3. **The applicant should address the distribution of short-term bicycle parking spaces and compliance with Section T10B-282.2 regarding accessibility and distance.**
4. **The applicant should illustrate how many long-term bicycle parking spaces are in each unit to demonstrate how the additional 17 spaces are provided.**

(j) Utility Services

The development will be served by underground electric, natural gas, water, and sanitary sewer utility services. Connections to all utilities will be in Thanet Circle. The applicant has received a Will Serve letter from Public Service Electric & Gas indicating availability of both gas and electric.

Staff Comments:

1. **A Treatment Works Approval will be required for connection to the sanitary sewer system.**
2. **The applicant should address whether a "Will Serve" determination has been obtained from New Jersey American Water for the potable and fire water services. The applicant has indicated that approval from NJDEP BWSE is required but should clarify whether this is true or not – Princeton is in an NJAW Master Permit area.**

(k) Disposal of Wastes

Trash and recycling receptacles are located within each unit's garage. The units that do not have garages have access to their trash and recycling containers from compartments on the exterior of the building.

Staff Comments:

1. **The applicant should describe how and where the receptacles are placed for pick up to ensure they do not conflict with ingress/egress from the garages or vehicle circulation on the drives.**

(l) Noise

Construction activities will be the primary source of noise for this development. The applicant will be required to comply with Princeton's noise ordinance and limits on construction hours. It is not anticipated that noise will be a nuisance once completed and occupied, with the exception of activities associated with the playground, which should be de minimis.

(m) Advertising Features

A complying non-illuminated 10 square foot sign at the entrance is proposed. Final site selection shall be approved by the land Use Engineer to ensure there are obstructions to sight distance at the intersection.

(n) Special Features

The applicant proposes amenities for the residents, including a playground, a seating area, and benches throughout the complex.

Staff Comments:

1. **The applicant should explore the opportunity to create pedestrian connections to the adjoining neighborhoods of Avalon Princeton Circle and Governor's Lane.**

(o) Waterway Corridors

A tributary to Harrys Brook passes through the existing site and will continue to pass through under proposed conditions.

Staff Comments:

1. **The tributary to Harrys Brook is a sensitive waterway corridor that will need to be protected during construction. The applicant should address how the stream will be protected to ensure that sediment, dust, construction materials, trash and debris will be prevented from entering the waterway. A detailed plan of construction operations specific to this shall be provided to the Municipal Engineer prior to commencement of construction and should be made a condition of approval.**

(p) Special Technological Impacts

None proposed.

5.0 GENERAL STAFF COMMENTS

5.1 The applicant shall demonstrate compliance with the applicable UHAC controls regarding unit location, similarity of affordable and market rate units, and bedroom and income distribution.

5.2 The applicant is proposing no improvements to the vehicular bridge and the pedestrian bridge over the tributary to Harrys Brook. The applicant should discuss whether the bridges will be in any way rehabilitated, for example by resurfacing, and include details on their plans.

6.0 SUMMARY OF RECOMMENDED CONDITIONS OF APPROVAL

If approved, the following conditions are recommended:

6.1 Other Agency Approvals:

- **Mercer County Planning Board**
- **Mercer County Soil Conservation District**
- **Delaware & Raritan Canal Commission**
- **NJDEP TWA**
- **NJDEP FHA Permit**
- **NJDEP FW Permit**
- **NJDEP 5G3 Construction Stormwater Permit**
- **Princeton Floodplain Development Permit**

6.2 Submission of a plan for protection of the tributary to Harrys Brook during construction. The plan should include an operations manual detailing daily actions to be taken to ensure that no construction activities result in any deposition of sediment, dust, construction materials, trash or debris into the waterway.

6.3 Submission of details regarding bridge rehabilitation, if any improvements will be required.

6.4 Submission of a Stormwater Management Facilities Operation & Maintenance Manual.

Documents Reviewed:

1. Application for Site Plan Review dated October 16, 2025, received November 19, 2025.
2. Major Site Plan Checklist, dated October 16, 2025, received November 19, 2025.
3. Green Development Checklist, dated October 16, 2025, received November 19, 2025.
4. Environmental Information Statement, prepared by Dynamic Engineering dated October 2025, received November 19, 2025.
5. ALTA/NSPS Land Title Survey prepared by Dynamic Survey dated June 28, 2024, received November 19, 2025.
6. Stormwater Management Report, prepared by Dynamic Engineering, dated October 2025, last revised April 2026, received April 21, 2026.
7. Preliminary and Final Major Site Plans, sheets 1 through 32, prepared by Dynamic Engineering, dated October 30, 2025, latest revision (Rev. 3) dated April 24, 2026, received April 27, 2026.
8. Tree Removal Exhibits and Chart, sheets 1 through 3, prepared by Dynamic Engineering, dated March 16, 2026, latest revision (Rev. 1) dated April 2, 2026, received April 28, 2026.
9. Fire Protection Plan, sheet 1, prepared by Dynamic Engineering, dated October 30, 2025, latest revision (Rev. 3) dated April 24, 2026, received April 27, 2026.
10. Fire Protection Narrative prepared by Dynamic Engineering, dated October 2025, received November 19, 2025.
11. Architectural Plans “Schematic Design” prepared by ktgy Architecture + Planning received on April 24, 2026,the following sheets:
    a. A1.0 dated April 20, 2026
    b. A2.0 dated April 23, 2026
    c. A2.1 dated April 23, 2026
    d. A2.2 dated April 20, 2026
    e. A2.3 dated April 23, 2026
    f. A2.4 dated April 23, 2026

g. A3.0 dated April 23, 2026
h. A3.1 dated April 20, 2026
i. A3.2 dated April 23, 2026
j. A3.3 dated April 23, 2026
k. A3.4 dated April 23, 2026
l. A3.5 dated April 20, 2026
m. A3.6 dated April 20, 2026
n. A4.0 dated April 23, 2026
o. A4.1 dated April 23, 2026
p. A4.2 dated April 23, 2026
q. A4.3 dated April 23, 2026
r. A4.4 dated April 23, 2026
s. A4.5 dated April 20, 2026
t. A4.6 dated April 20, 2026

12. Traffic Impact Study, prepared by Dynamic Traffic, dated October 31, 2025, received November 19, 2025.
13. Report of Supplemental Geotechnical Investigation and Stormwater Basin Area Investigation, prepared by Dynamic Earth, dated October 29, 2025, received November 19, 2025.

SWM Consulting
Storm Water Management Consulting, LLC
141 Mountain Road Ringoes, New Jersey 08551
Phone: 908-806-7700 Facsimile: 908-806-7721

April 30, 2026

Mr. James J. Purcell, PE, PMP
Assistant Princeton Engineer
400 Witherspoon Street
Princeton, New Jersey 08540-3496

Re: Toll NJ I, LLC – Preliminary and Final Site Plan
29 Thanet Circle
Block 5502 Lot 5
Stormwater Management Technical Review Report 2

Dear Mr. Purcell:

In accordance with your request, presented below are the results to date of our technical review of the stormwater management aspects of the revised Toll NJ I, LLC Preliminary and Final Site Plan application at 29 Thanet Circle. Our review has been conducted in accordance with the Princeton Land Use Code and the stormwater management standards of the Princeton Engineering Department and the following project documents:

1. Revised Preliminary & Final Site Plans dated April 17, 2026 prepared by Dynamic Engineering Consultants, PC
2. Revised Stormwater Management Report dated April 2026 prepared by Dynamic Engineering Consultants, PC
3. Report of Supplemental Geotechnical Investigation and Stormwater Basin Area Investigation dated October 29, 2025 prepared by Dynamic Earth, LLC
4. Revised HydroCAD computer models prepared by Dynamic Engineering Consultants, PC sent via email.

As shown on the Revised Site Plans and described in the Revised Stormwater Management Report, the proposed project comprises a total area of approximately 4.2 acres and includes the construction of multi-family residential structures and associated parking, driveway, and landscaped areas. Considering this amount of site disturbance, the project meets the definition of Major Development as contained in the Princeton Stormwater Control Ordinance (SCO) and must therefore meet the SCO's stormwater management requirements.

As described in the Revised Stormwater Management Report, the existing project site, which includes an office building and associated parking and driveways, is bisected by an unnamed tributary of Harry's Brook Branch 2 that flows in a generally southeasterly direction to Branch 2. Both the northeastern and southwestern portions of the project site currently drain to an existing stormwater detention basin in the northeastern portion of the site. The existing detention basin, which was originally constructed in 1994 and modified in 2005, then discharges directly to the unnamed tributary, which then joins Branch 2 approximately 200 feet downstream. As shown on the Revised Site Plans, the existing project site impervious cover is 109,059 square feet (2.50 acres).

As described in the Revised Stormwater Management Report, the proposed project consists of demolishing the existing office building and parking areas for the construction of 10 proposed multi-family residential townhome buildings consisting of 85 total dwelling units. Associated site improvements include surface level parking and driveways, pedestrian walkways, and surface and subsurface stormwater management facilities. As shown on the Site Plans, the proposed project site impervious cover would be 129,715 square feet (2.98 acres), an increase of 20,656 square feet (0.47 acres).

Stormwater Quality and Quantity Control:

Unlike existing site conditions, proposed surface and subsurface stormwater management facilities will separately manage runoff from the northeastern and southwestern portions of the project site. The existing detention basin in the northeastern portion of the site will be modified to only control runoff from this portion of the site along with two upstream proposed porous paving/subsurface storage basins. These two basins will discharge to the modified existing basin which will continue to discharge to the unnamed Branch 2 tributary at the same location as the existing basin. Modifications to the existing basin include converting it into a bioretention basin to provide both stormwater quality and quantity control similar to the two proposed porous paving basins.

Runoff from the southeastern portion of the site will be controlled by a proposed bioretention basin and a series of porous paving/subsurface storage basins. The downstream basin will also discharge to the unnamed Branch 2 tributary through a proposed headwall at a point generally opposite the outlet from the existing basin described above. The proposed bioretention basin and porous paving basins will also provide both stormwater quality and quantity control.

Groundwater Recharge:

As described in the Revised Stormwater Management Report and detailed in the Report of Supplemental Geotechnical Investigation and Stormwater Basin Area Investigation noted above, all project site soils exhibit Hydrologic Soil Group D soils. As a result, there is no calculable groundwater recharge occurring at the existing site.

Green Infrastructure:

The five proposed porous paving/subsurface storage basins, the proposed bioretention, and the modified existing stormwater detention basin (to be converted to a bioretention basin) that will provide stormwater quality and quantity control under proposed site conditions are all Green Infrastructure facilities as defined in the Princeton SCO.

Comments:

The review of the proposed stormwater management measures indicates that the proposed project, in general, meets the stormwater quantity, stormwater quality, and groundwater recharge control requirements of the Princeton SCO. However, the following comments need to be addressed before final approval is granted:

1. A review of the Green Infrastructure (GI) characteristics indicates that all of the proposed stormwater measures meet the SCO requirements with the exception of the modified existing detention basin. According to the Revised Stormwater Management Report, this basin will be converted into a bioretention basin in order to provide stormwater quality for an equivalent 1.9 acre drainage area and will provide for stormwater quantity control for a total drainage area of 2.7 acres. While the total 2.7 acres exceeds the 2.5-acre limit for Small-Scale Bioretention Basins, that drainage area limit is related to stormwater quality control.

   In addition, the following should also be noted:

   a. The application is for the redevelopment of a currently developed site with an existing detention basin.

   b. The applicant proposes to reutilize the existing detention basin by converting it into a bioretention basin that provides both stormwater quality and quantity control.

   c. The Converted Bioretention Basin meets all the requirements for GI Bioretention Basin for stormwater quantity control in the NJDEP Stormwater BMP Manual.

   d. Except for its drainage area, the Converted Bioretention Basin also meets all the requirements for a Small-Scale GI Bioretention Basin in the NJDEP BMP Manual.

   e. The runoff from 0.8 acres of the total 2.7-acre drainage area to the Converted Bioretention Basin will already be treated for Stormwater Quality by the two proposed upstream porous paving/subsurface storage basins. As a result, the Converted Bioretention Basin will receive untreated runoff from only 1.9 acres of the proposed site, including 1.1 acres of proposed impervious surface. As a result, the Converted Bioretention Basin will provide additional stormwater quality control above the SCO's 80% TSS removal rate for the remaining, upstream 0.8 acres. Diversion of a portion of this upstream area away from the Converted

Bioretention Basin to meet the 2.5-acre limit could reduce this additional quality control.

f. While it may be possible to reduce the Converted Bioretention Basin's drainage area to the 2.5-acre limit through redesign of the proposed stormwater systems in the northeastern portion of the project site to divert the runoff from at least 0.2 acres away from the Basin, this will require the creation of a new runoff discharge point from the site, either directly into the unnamed Branch Two tributary or overland through offsite properties into Branch Two. As currently proposed, all runoff from the northeastern portion of the project site will continue to be discharged to the unnamed tributary via the Basin's outlet pipe at the same, single location as the existing site.

Therefore, as we discussed, the Converted Bioretention Basin as currently proposed provides stormwater management additional benefits to the project site's runoff quality and to both Harry's Brook Branch Two and its unnamed tributary that offset the slight (8 percent) exceedance of the SCO's drainage area limit and, as such, warrants approval. However, this finding should be reviewed with the NJDEP to determine what waivers or other measures to be taken to comply with Princeton's General Municipal Stormwater Discharge Permit.

2. There are discrepancies in the invert elevations and lengths of the outlet pipes from the proposed stormwater management measures between the HydroCAD models and the Drainage Plans that must be resolved in the final submission documents.

3. The top elevations of the reinforced concrete wall at the existing stormwater detention basin (proposed to be converted to a Bioretention Basin) should be shown on the Grading and Drainage Plans. If considered necessary, these elevations should be confirmed by field surveys.

4. The date of the Site Plans cited in the Revised Stormwater Management Report should be updated to reflect the date of the Revised Site Plans.

5. To facilitate construction and help insure accuracy, consideration should be given to constructing the various outlet structure flow control orifices from aluminum or other lightweight non-corroding material and attached with non-corroding removable fasteners over a large opening in the outlet structure wall. For similar reasons, consideration should also be given to constructing the crests of the various outlet structure flow control weirs in the same manner. In doing so, slotted openings in the orifice and weir crest plates should be considered to provide elevation adjustments in the field.

6. As shown on the Drainage Plans, the outlet pipes from Porous Paving/Subsurface Storage Basins 1.4 and 1.6 will be discharged to the outlet structure at Basin 1.5. In addition, the outlet pipe from this Basin will then be discharged to the outlet structure at Basin 1.3. However, these connections are not depicted in the Outlet Structure Details in the project plans. As a result, detailed drawings of the outlet structures for Basins 1.3

and 1.5 should be included in the project plans to ensure appropriate design and accurate construction.

7. Based upon the drainage area and height of the reinforced concrete wall, the Converted Bioretention Basin meets the definition of a Class IV Dam as specified in the NJDEP Dam Safety Standards (NJAC 7:20). As a result, routing computations must be provided in the Stormwater Management Report that demonstrates that the Basin can convey the Class IV Dam Spillway Design Storm (SDS) with a minimum of 1 foot of freeboard. As specified in the Standards, this SDS should be based upon 150% of the Current 100-Year 24-Hour rainfall and the NRCS Type D Storm. In addition, the computations may be based upon an empty basin at the start of the SDS rainfall and all Basin outlets may be assumed to be operational.

8. An Operations and Maintenance Manual for the proposed stormwater management measures must be submitted for review.

I trust that the above describes the results of our technical review of the stormwater management aspects of the Toll NJ I, LLC Preliminary and Final Site Plan application at 29 Thanet Circle In accordance with our agreement with Princeton, no structural, geotechnical, or soil erosion or sediment control reviews have been undertaken. Please feel free to contact me with any questions you may have regarding our technical review.

Yours truly,

Storm Water Management Consulting, LLC

Joseph J. Skupien, PE, PP
President

Bowman

April 04, 2026

James Purcell, PE
Assistant Municipal Engineer/ Acting Land Use Engineer
Municipality of Princeton
400 Witherspoon Street
Princeton, NJ 08540

RE: Traffic Engineering Review
Preliminary/Final Site Plan
TOLL NJ I, LLC
Proposed Multi-Family Residential Development
29 Thanet Circle
Block 5502, Lot 5
Princeton Municipality, Mercer County, New Jersey

Dear Jim:

As requested, Bowman Consulting Group, Ltd (Bowman) has completed a traffic engineering review of the materials submitted on behalf of Toll NJ I, LLC (the "Applicant") for the multi-family residential development at 29 Thanet Circle in the Municipality of Princeton, Mercer County, New Jersey.
The proposed development involves the demolition of the existing 2-story, 48,167 square foot office building and construction of 85-unit multi-dwelling residential development. The site is located within the Affordable Housing (AH-14) Zone which was previously the Office Research Residence (OR 2T) Zone.

Vehicular access to the proposed development will remain via two existing unsignalized driveways along Thanet Circle. There are sidewalks along both sides of Thanet Circle. This review focused on the following specific areas: i) traffic generation and impacts ii) vehicle and pedestrian access and circulation; iii) parking requirements; and iv) accepted traffic engineering and transportation planning practices.

We received the following materials which are the subject of this review:

- Preliminary and Final Site Plan for Toll NJ I, LLC; Proposed Multi-family Residential Development dated October 30, 2025, with the latest revision January 8, 2026, and prepared by Dynamic Engineering.
- Traffic Impact Study for Toll NJ I, LLC- Proposed Multi-Family Residential Development, dated October 31, 2025, prepared by Dynamic Traffic.
- Schematic Design (Architectural) dated January 13, 2026, and prepared by Ktgy Architecture+ Planning.
- Dynamic Point Response Letter dated January 19, 2026, and prepared by Dynamic Engineering.
- Application Form with Narrative

460 Veterans Drive, Suite 6A, Burlington, NJ 08016

P: 609.585.5745

Based on our review of the submitted documents, we offer the following comments for consideration by the Board during the review/approval process:

Traffic Impact Analysis

1. The proposed site would generate 43 trips (10-in, 33-out) in the AM peak hour and 48 trips (30-in, 18-out) in the PM peak hour based on the Institute of Transportation Engineers (ITE) Trip Generation rates for ITE Land use code (LUC) 220 for "low-Rise Multi-family Housing" and location 'not close to rail transit'. This trip generation is deemed conservative as no credit was taken by the applicant for the traffic generated by the existing 48,167sf office use currently at the site. At full occupancy, the existing office would generate 31 more trips than the proposed residential development during the AM and PM peak hours, respectively.

   Further reduction in the site traffic would be anticipated due to the change in working habits as more people are embracing current and future trends in remote work and hybrid work, in addition to the site's proximity to bus routes/stations and walkability of the area.

   Based on the foregoing, it is my professional opinion that the surrounding roadways and intersections will continue to operate acceptably during the weekday peak periods with the anticipated traffic generated by the proposed residential development.

2. Level of service (LOS) B or better is projected at the Terhune Road and Thanet Circle Intersection during the no-build and build condition (with the proposed site) in the AM and PM peak hours, respectively. Additionally, the two site driveways along Thanet Circle would operate at LOS A with the proposed site in operation. These operating conditions are considered favorable and acceptable.

Site Plan Review

3. Long-term and short-term parking locations are shown on the Schematic Design and site plan, respectively. **Detail/design of the short-term bike rack in accordance with the Municipality's desired standards should be provided. According to the Municipality's ordinance, construction plan should be provided for long-term facilities.**

4. The applicant stated that 102 long-term bicycle parking spaces are being provided internally in each building unit. The architectural plans (Schematic Design) show the locations of these bike parking spaces within each building, however the storage capacities (number of spaces) at each location are not indicated. **The number of bike spaces provided within each building location should be provided.**

5. Thirty-eight (38) short term bicycle parking spaces have been provided, including 18 spaces adjacent to the proposed playground and another 18 spaces on the east side of Building C. Testimony should be provided to demonstrate that the locations of the short term spaces are

distributed equitably to serve each building while promoting the most efficient circulation and movement of pedestrians. There is a concern that the location of the short-term parking space may be deemed remote for residents within Buildings E, F, H and J, respectively. **Consideration should be given to locating another short-term parking facility closer or central to the entrances of these buildings to maintain/achieve the original intent of proximity to building entrances for short-term parking.**

6. The architectural plan indicates 95-gallon garbage totes within some building units, likely assigned to each dwelling unit. The applicant should clarify whether it is the intent to provide each unit with garbage totes and if so, what is the number of totes per unit**. A refuse truck circulation template has been provided for the site, and it appears that there is no designated central dumpster for trash pickup. Testimony should be provided regarding the garbage collection/disposal process anticipated for the site.**

7. Forty (40) surface parking spaces have been provided within the site. Based on the distribution of the parking spaces within the site, it seems that 28 spaces would serve Buildings E, F, G, H, I and J (combined total of 51 dwelling units) and 12 parking spaces are designated in the area of Buildings A, B, C, D (combined total of 34 dwelling units). **Based on the proportion of the total units proposed, the area encompassing Buildings A, B, C, and D would require additional four parking spaces or more. Information regarding the rationale used in distribution of the surface parking spaces within the site should be provided.**

If there are any questions, or you would like to discuss the above comments in greater detail, please contact our office at your convenience.

Sincerely,

Victor Anosike, PE, PTOE
Project Manager

MUNICIPALITY OF
PRINCETON
Shade Tree Commission
400 Witherspoon Street
Princeton, New Jersey 08540
(609) 497-7639

TO: **PRINCETON PLANNING BOARD**

FROM: Princeton Shade Tree Commission

RE: Toll NJ I, L.L.C.
Block 5502; Lot 5
Preliminary/Final Major Site Plan

DATE: April 1, 2026

The Princeton Shade Tree Commission (STC) Subcommittee has reviewed the Preliminary/Final Major Site Plan for Block 5502; Lot 5.

General Information:

The project site, known as Block 5502, Lot 5, is approximately 9.25 acres with frontage on Thanet Circle along the site's western boundary. This partially developed site has a two-story office building with an adjacent parking area as well as stormwater management facilities and a central landscaped area. It is bordered to the north and east by multi-family residential development, while single-family dwellings border the project to the south. The remainder of the site is wooded.

The proposed project consists of demolishing the existing office building for the construction of 10 proposed multi-family residential townhome buildings consisting of 85 total dwelling units.

The applicant submitted its application prior to passage of the December 2025 updated Trees and Shrubs Ordinance. Therefore, the criteria from the former Ordinance apply to the tree removals when determining the number of replacements required for this project.

Findings:

The site currently contains numerous opportunistic trees, primarily Lindens and Maples, along with a few intermixed species such as Sweetgum, Walnut, Cedar, and Locust. Species and size data were provided for 528 trees. The proposed plan calls for the removal of 180 trees (8" DBH or greater). The attached Excel spread sheet provides a detailed review of the proposed planting plan, which includes trees, shrubs, perennials, and grasses.

Of the 180 tree removals, 160 falls within the one-to-one replacement category (8"-16.99"); 16 are within the two-to-one replacement category (17"-30.99"); and four are in the three-to-one category (31"-38.99"). ***Therefore, the total number of replacement trees is 204. The plan calls for planting 198 trees along with numerous shrubs, perennials, and grasses. The planting of six more trees is required to meet the Ordinance provisions.***

The proposed planting plan does offer a diversity of tree species. The only suggested change is to eliminate the Red Maple, as it is already widely planted and proliferates throughout the Princeton area. We recommend that the Eastern Redbud (Cercis canadensis) serve as the alternative. Otherwise, the proposed plantings are acceptable and consist of mostly native and non-invasive species.

As stated above, this plan avoids monoculture, which the STC works to discourage developers from planting. Diversifying species reduces the risk of future tree loss due to pests or disease. The industry standard we follow is 10-20-30: no more than 10% of any species, 20% of any genus, and 30% of any one family.

The Municipal Trees and Shrubs Ordinance (Chapter 22) requires contractors to safeguard, during construction activities, the ground around trees, defined as the "Tree Protection Zones (TPZs)." Protected trees include those on the construction site and trees on adjacent property--including in the Municipal Right-of-Way -- whose TPZ would overlap the property line. Fencing is required to protect these areas. The Enforcement Officer determines the TPZ based on factors such as the tree's species, age, structure, and health, as well as the soil conditions.

On the subject of tree protection, the STC urgently points out that a healthy and growing canopy is a town-wide goal. Princeton's recently completed tree inventory has revealed a disturbing loss of 500 acres of trees over ten years. Thus, there is a consensus among town officials--a consensus that is reinforced in Princeton's new Community Forestry Managing Plan and its updated Community Master Plan--that canopy be increased from 59% to 65% in the next five years.

Specifically, Princeton remains concerned with the environmental impacts of a dwindling canopy: increased flooding, soil instability, erosion, diminished protection from air pollution and the elements, decreased carbon sequestration, and the fragmentation of the urban forest. Such disruptions can exacerbate the already shrinking population of native pollinators and other indigenous insects, birds, and animals.

On the site that is the subject of this application, the STC suspects that there are tributaries of Harry's Brook, a longstanding source of repeated extreme flooding in its surrounding neighborhoods. Moreover, the Watershed Institute has recently found high levels of Total Suspended Solids and point source pollutants in Princeton's tributaries, all of which are made worse by erosion. ***Removing 180 large, mature trees, which serve to absorb the vast volume of stormwater that occurs when intense storms flood the brook, not only is an environmental threat but also undermines Princeton's goal to increase its canopy.***

The STC urges applicants who want to remove mature, healthy trees to review their site plans with a view to finding alternatives that could save these trees. As the Watershed Institute points out in its studies, healthy, mature trees are a primary weapon against erosion and stormwater runoff.

Of particular concern are stands and groves—groups of trees whose roots commonly intermingle and that absorb air pollution, moderate temperatures, reduce noise, serve as wind breaks, and can better resist disease and insects. Removing even some of these trees could negatively affect the remaining ones.

In conclusion, as with other New Jersey Municipalities, the STC urges applicants to avoid clear cutting their properties. ***Replacement trees of 2.5- to 3.0-inch caliper--only 50 percent of which survive five years on average--cannot compensate for the unique and critical benefits provided by mature, healthy trees.***

Daniel Dobromilsky & Associates

Landscape Architecture - Planning - Tree Expert

177a Rossmoor Drive - Monroe Township - New Jersey - 08831 (609) 273 - 2455

MEMORANDUM

DATE: March 31, 2026

TO: **Planning Board,**
Municipality of Princeton

FROM: **Dan Dobromilsky**, L.L.A., P.P., L.T.E.

RE: **29 Thanet Circle – Toll NJ I, LLC**
Preliminary & Final Site Plan
Landscape Architectural Plan Review
P2525-712P 788 PR (B-5502, L-5) AH-14 Zone

A site visit has been conducted and the submitted plans (Site Plan dated 10-30-26, Tree Removal Plan dated 3-16-26) have been analyzed relative to Township ordinances, industry standards, and existing site features. The following comments, concerning the landscape architectural aspects of this proposal are offered for consideration as this application is reviewed:

1. The plans specify the removal of 180 trees, ranging in size from approximately 8" to 38" diameter, with the majority of trees to be removed measuring between 8" and 20". Approximately 25 of the trees to be removed are likely native woodland trees, so the majority of the trees to be felled are trees planted in association with the existing office building landscape. Amongst the planted landscape trees to be removed, many of them are *Tilia,* Linden (32 - most likely Little Leaf Linden) and *Betula*, Birch (21 – River Birch), with 2 *Pyrus* (Callery Pear). Thus, the impact upon native woodland forest is rather minor, as is suggested in the Environmental Impact Report included with the application.

   The proposed tree removal results in a requirement to plant 198 replacement trees. The landscape plans specify the planting of exactly 198 replacement trees, when the three trees proposed in the bio-retention basin are included in the calculation.

   There are a handful of trees along the edges of the limits of disturbance that possibly could be preserved with some minor adjustments; and some that may actually be lost once the type of root zone disturbance is considered. In particular, existing trees #4389,4365,4366 & 4367 could likely be preserved if a storm outfall pipe was shifted away from these trees. However, trees #4101 & 4440 seem to have some significant excavation in very close proximity that will likely diminish the potential to preserve them as suggested on the plans. It is recommended that an on-site evaluation, of all of the trees along the limit of disturbance line, be conducted with the Municipal Arborist to make a final determination of tree removal required with an updated calculation of the tree replacement required.

2. It is noted that six of the existing trees to be preserved are identified as "Princess" species, and five of the trees to be preserved are identified as "Pear." If the "Princess" is Empress Tree of China and the "Pear" are Callery Pear it may be appropriate to evaluate if preservation of these highly invasive species present a concern for detrimental impact to the environmentally sensitive landscapes in the area. Perhaps these trees could be looked at with the above-mentioned review by the Municipal Arborist.

3. The plans include a landscape compliance chart indicating only one ordinance landscape standard requirement beyond the tree replacement ordinance. The number of trees required in association with parking stalls. Twelve trees required for the 40 proposed parking stalls. The plans offer a compliant quantity of trees.

4. The following comments and concerns are offered regarding detailed landscape plan specifications:

   a. It is noted that a large or significant quantity of the proposed trees are of only a few species. In particular, 43% (86) *Juniperus* tree species; and 12% (24) *Amelanchier* tree species. Not all of these trees are native species. The potential to specify a greater diversity of tree species should be explored, to limit the potential for failure due to an infestation, but also to offer greater seasonal interest and environmental benefit relative to other native flora and fauna.

   b. A significant quantity of the *Juniperus* trees are proposed along the northeast boundary as a buffer between this use and the adjacent Governors Lane, in a very narrow landscape strip. This space is very limited in terms of dimension, but it seems that a row of existing trees and shrubs are present directly abutting this location on the adjacent property, and many of these existing trees may be dead, damaged, or declining. This location should be examined in detail to determine if the proposed landscape specifications and design offer plantings that will likely thrive in this location, and not inhibit existing landscape plantings. Since, the area is elevated above the parking lot it may be that a mix of evergreen shrubs and tree species would offer a greater potential for success and long-term evergreen buffering. There are many locations throughout the site where canopy trees could be planted to make up for any reduction in tree planting along this buffer, if necessary.

   c. There are a few non-native plant species proposed that present concern for invasive tendencies, deer foraging, and/or minimal collateral environmental benefit. More specifically alternate selections should be considered for the proposed: *Acer palamtum*, Japanese Maple; *Taxus media*, Yew; *Forsythia*; and *Lagerstroemia*, Crapemyrtle.

   d. Typical unit planting plans and lists are offered with all of the same plant selections for each building. The opportunity to offer a greater variety of shrub and perennial plant species around the building units to enhance seasonal interest, variety, and collateral environmental benefits should be considered.

   e. It should be confirmed that the unit landscape design will buffer or screen views of utility meters or similar equipment on the building exterior or at locations on the site.

   f. The extent of turfgrass, meadow grass, and mulch bed should be clearly delineated or specified on the landscape plans. Irrigation (hose bibs or an automatic system) to establish and sustain the landscape should be addressed.

   f. The planting schedule should be augmented to include additional specifications to assure that the plantings will be appropriate for the location:

      i. A height specification for canopy and ornamental trees.
      ii. A height and width specification of shrubs.
      iii. A stem quantity range (e.g. 3 to 5 stems) for multi-stem ornamental tree selections.

5. The plans specify benches and picnic tables that present a rather utilitarian design style. There are many site furnishing manufactured of recycled materials with design form and style that would be more aesthetic, and in character with a residential setting. The Board may wish to examine the proposed site furnishings (benches, picnic tables, bicycle racks, retaining walls, fences, guiderails, play equipment, signs, etc.) and offer comments or input.

6. The location of any exterior utility elements and storage or collection (e.g. Refuse Dumpster, Water Hot Box, etc.) should be examined to determine if alternative construction materials or visual screening / buffering is necessary and appropriate.
7. The construction details offer an option for an exposed footing in association with site light poles, if the location is within a parking lot and not in a protected landscape bed. The applicant should indicate if any of the proposed lights will be located in a location that is exposed to potential impact by vehicles and thus require an elevated footing.
8. The applicant should indicate if any of the luminaires associated with light poles or building mount locations will be angled upward to create the prescribed illumination pattern or coverage. Angled light luminaires can produce excess glare and nuisance concerns.

Additional commentary may be offered relative to specific requests or questions, and in response to testimony or the submission of additional information.

cc: Land Use Engineer
Zoning Officer
Planning Director
Admin. Coordinator

Municipality of Princeton

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PRINCETON ENVIRONMENTAL COMMISSION

To: Princeton Planning Board
Justin Lesko, Planning Director

From: Anne Soos, Chair, Princeton Environmental Commission

Date: March 25, 2026

Re: Toll NJ I, L.L.C.
Prelim/Final Major Site Plan
Block 5502, Lot 5
Zone AH-14
File #

In accordance with the legal authority and responsibility of the Princeton Environmental Commission (PEC), we have conducted a review of the application materials provided to the Commission by the Municipality of Princeton. These include, but are not limited to: Site Plan and Landscape drawings, Environmental Impact Statement, and Stormwater Management Report prepared by Dynamic Engineering Consultants, P.C., dated 10/30/2025; and Architectural drawings prepared by Smita Anand, Architect, dated 11/12/2025.

PROJECT DESCRIPTION

The applicant proposes demolishing a 46,167 SF office building with parking areas in order to create a residential development of ten townhouse-style buildings which will contain sixty-eight market-rate and seventeen affordable units. Existing woods cover 52.7% of the approximately 9.95-acre project site. Of the 529 existing trees, 180 are

slated to be removed. The property is divided by a tributary of Harry's Brook Branch 2, which sits just off the property to the south-east. Impervious lot coverage will increase from 109,059 SF (27.1%) to 125, 961 SF (31.3%), where 181,094 (45%) is permitted.

EXECUTIVE STATEMENT

The applicant has included some sustainable practices in their design of the buildings and landscape. Using FSC-certified wood is a great example. Including a playground on premises is another. The PEC is hoping this indicates they are open to the recommendations below to make even greater moves toward sustainability across the project.

The property sits in an environmentally vulnerable spot in terms of its proximity to Harry's Brook Branch 2 and its tributary, as well as to the heavily wooded ring around the existing building and parking areas. There are a handful of very old-growth, native, keystone oak and tulip trees of 120' (+) that the applicant is proposing to remove in the southwest corner of the lot (in the proximity of proposed Building A. If they are deemed healthy by the municipal arborist, several of these trees could (and should) be saved by relocating Building A elsewhere.

Take special precaution during demolition to prevent debris from entering the tributary and Harry's Brook, with attention to rain events.

We would like to see the project be all-electric.

With the intent of advancing the goals of Princeton's Climate Action Plan and the Green Building and Environmental Sustainability Element of Princeton's Master Plan, the PEC makes the following recommendations:

RECOMMENDATIONS

BUILDING & ENERGY

- Design an all-electric project.
- Ensure roofs are made solar ready by installing conduit between electrical panels and roof.
- Garages should have a 240V receptacle for an occupant to install an EV charger.

- Provide heating and cooling via cold climate air-source heat pumps.
- Install heat pump hot water heaters and clothes dryers.
- Follow construction standards such as LEED (v5 BD+C for midrise multifamily), Passive House or other green building standards for the building envelope and air quality and general sustainable project design practices.
- It appears that in Building G, Unit D, Bedroom #3, there is no window. One should be included for natural light and ventilation.
- Specify casement and awning style windows in place of the less efficient double-hung windows currently in the design.
- Design solar shading strategies (incorporated with building construction and/or landscaping) on the S-W facades to decrease the heat load in the warmer months.
- Where solar shading is in place, low-E glass coating can be eliminated to provide increased heat gain in the winter months.
- To reduce water waste at hot water fixtures, 'home-run' style supply manifolds should be installed at each property and WaterSense plumbing fixtures should be specified where applicable.
- Use bird-safe glass on windows to prevent bird-strikes, which can happen at any building height.
- Use light colored roofing shingles.

STORMWATER MANAGEMENT / LANDSCAPE

- Old-growth, Keystone trees should not be taken down (as per Executive Statement). These trees are irreplaceable in our lifetimes. They are a gift providing stormwater management through their massive root systems by absorbing hundreds of gallons of rainwater and stabilizing soil, thus helping to prevent/reduce runoff into and erosion around the tributary and brook. They cool the air and sequester carbon dioxide from the atmosphere. Further, they are a critical part of the local ecosystem.
- To promote a healthy habitat for birds and insects, native, non-invasive plantings should dominate the landscape design.
- On January 20, 2026, New Jersey DEP adopted the REAL (Resilient Environment and Landscapes) rules for developments near fresh water wetlands and coastal lands. This project, having been reviewed and approved in 2021, will be grandfathered into the old regulations, so compliance will not be required. However, given the location of this site with wetlands, it is in the interest of the community to build to the new regulations.
  https://dep.nj.gov/wp-content/uploads/rules/rules/njac7_13.pdf
- Deep-rooted grasses and ground covers should be used on the banks of the tributary and up to the buildings' sidewalks to absorb, slow and recharge stormwater before entering the tributary. Consult with Dan Dobromilsky, the municipal landscape consultant, to choose the best native plantings.
- Provide and help maintain a space(s) with adequate light for a community garden, which should include the beds, water, tools and compost bin.

- To prevent disruption of bird and insect migration, exterior lighting, including for signage, should be DarkSky International compliant. See General Comments for details.

HEALTH

- Maximize the use of operable windows for natural ventilation. Casement window swing direction can be designed to catch the prevailing winds for optimal ventilation. In addition to the casement windows, some awning style windows should be included in the design, as they can be left open when it rains.
- Induction stovetops should be specified for the kitchens to provide better air quality than gas and to eliminate the need for fossil fuel energy.
- Add playground equipment suited to pre-schoolers to provide them with exercise without the care-giver having to take them offsite.

WASTE

- Provide organic waste collection in addition to that for trash and recyclables.

GENERAL COMMENTS

- In most cases, the most sustainable building practice is preserving the existing building and adapting it to a new use or renovating it. **Did the applicant explore adapting the existing office building for residential use?**
- Heat pump clothes dryers should be specified. Heat pump dryers have three environmental benefits-
  1) They have a high level of efficiency because they use heat pump technology to dry, with a high coefficient of performance (COP)
  2) The moisture from the drying process is collected on a refrigerant coil and discharged into the washer drain, thus there is no requirement for a 4" duct vent through the thermal boundary of the dwelling, which can create a thermal leak point.
  3) Because the dryers are not vented, they do not exhaust conditioned air.

- To learn about hot water manifold delivery, please view this Princeton Green House Tour video at time mark 6:35.
  https://www.youtube.com/watch?v=98rS23Mz9tM
- DarkSky recommendations include the following: luminaires not to exceed 3000k and targeting maximum 2700k color temperature (lowest lumen level required for safety). Motion detector activation and dimming ability. Preferably no uplighting. Decorative (non-essential) lighting should be extinguished at night. Fixtures should be fully shielded.

https://darksky.org/what-we-do/darksky-approved/darksky-approved-luminaires-program/darksky-approved-luminaires-guidelines/

- Passive House green building practices: https://www.phius.org/passive-building/what-passive-building/passive-building-principles
- LEED green building practices: https://support.usgbc.org/hc/en-us/articles/25316160948755-LEED-v5#:~:text=guidance%20is%20published.-,Can%20residential%20projects%20use%20LEED%20v5%20BD+C?,systems%20available%20to%20residential%20projects
- Please note, the answer to the Green Development Checklist item #30 does not address the question. Solar shading (used to prevent solar heat gain to the interior) is different from solar array (renewable energy source).

- Acer palmatum (Japanese maples) are considered invasive. Arborvitae and yew are vulnerable to damage from deer. In the interest of maintaining a healthy ecosystem, using these resources will assist in specifying native plantings:

  https://www.princetonnj.gov/DocumentCenter/View/19172/Recommended-Trees-Species?fbclid=IwY2xjawGxq_FleHRuA2FlbQIxMAABHYGnomszAbKOgQABvvLQuUfpz99xR2i5Ksi3g9kNYycMRgzqJmaDSwXcBA_aem_mzp2cvIk3d0xWC-8pP7sbg

  https://extension.umd.edu/resource/groundcovers/

  https://njaes.rutgers.edu/fs1140/

- According to the Cornell Lab of Ornithology, more than 1 billion (yes, with a “B”) birds are killed annually in the United States from bird strikes on windows, and half of those occur on residential buildings. There are affordable things you can do to prevent it from happening. Bird-friendly glass resources:

  https://nycbirdalliance.org/take-action/make-nyc-bird-friendly/make-your-windows-bird-friendly

  https://dl.allaboutbirds.org/windowcollisionswebinar?utm_medium=email&_hsenc=p2ANqtz-8YUL5TJYcIZuQYJqA4wBrN-VyOTcTqt8S8I-B8Je3nLznhGGg2YJiesvXeO2_uVhmmoxuzfmU7C28OuPrPcsZYnjeNGA&_hsmi=408707386&utm_content=408707386&utm_source=hs_email