

January 25, 2024

Via Email

City of Bayonne Planning Board
630 Avenue C
Bayonne, NJ 07002

Attn: Richard N. Campisano, Esq., Planning Board Counsel
Alicia K. Losonczy, Planning/Zoning Board of Adjustment Administrator

RE: P-23-017
Application for General Development Plan Amendment
Applicant: Mahalaxmi Bayonne Urban Renewal, LLC

Dear Ms. Losonczy and Mr. Campisano:

As you are aware, the Applicant has proposed to amend the above-referenced general development plan (GDP) to *a*) memorialize previously approved development, and *b*) anticipated future development within *a portion* of the GDP Area. In the course of my compliance review, I have concluded that the Applicant has provided insufficient information for me to make a recommendation to the Board. Specifically, the Applicant has proposed to redistribute a portion of the fixed number of units authorized by the GDP into *a portion* of the GDP Area's development parcels (the "Modification Parcels"). On a land area basis, these Modification Parcels represent approximately 1/3 of the total GDP Area. The proposed redistribution of the total number of GDP-authorized units would necessarily require an adjustment to the density, phasing and infrastructure responsibilities associated with the development parcels that are not proposed to be modified by this application (the "Non Modification Parcels"); however, the Applicant has provided no information on how this would be achieved.

Without information regarding the modified distribution of density and phasing of the *entire* GDP Area, I cannot determine the impact that the proposed distribution would have upon the GDP and/or Redevelopment Plan goals, nor can I affirm that the proposed redistribution would not negatively affect the Board's positive findings as recited in Resolution of Approval P-19-022 . By way of example, increasing density within selected parcels while decreasing density on others could jeopardize the ability of development to support the Redevelopment Plan/GDP's intent to provide an orderly delivery of open space and infrastructure within the GDP Area. Likewise, unplanned redistribution might lower densities on development parcels to an extent that structured parking is economically infeasible.

In conclusion, I cannot make a professionally responsible recommendation to the Board regarding the proposed GDP amendment without information on how it would affect the entirety of the GDP Area's density distribution and phasing.

Respectfully,



Andrew Raichle, PE
Vice President