

400 Valley Road  
Suite 304  
Mt. Arlington New Jersey 07856  
Main: 877 627 3772



June 23, 2021

Chairman Steve Greet & Planning Board Members  
Borough of Garwood Municipal Building  
403 South Avenue  
Garwood, NJ 07027

Garwood Paperboard Urban Renewal Associates, LLC  
Preliminary & Final Site Plan & Minor Subdivision Approval with  
C(2) Variance Relief  
75 North Avenue  
Block 211, Lot 6  
Borough of Garwood, NJ  
**Township Of Cranford Application Concerns**  
Colliers Engineering & Design Project No. CDT001C

Dear Chairman Greet and Planning Board Members,

The Township of Cranford received a notice of public hearing regarding the above referenced project to be held on June 23, 2021. Thank you for the opportunity to provide input on this project that will have an impact on our community. We do so respectfully, and with the clear understanding that this project is not located within Township boundaries.

Although the project is not located within Township boundaries the project will have an impact on our community, and we are concerned about stormwater flow within the Township downstream of this development. Cranford is subject to extensive flooding, and always under the threat of harm to life and property by a significant storm. Cranford residents have regularly suffered through devastating and destructive historical flooding, and with the increasing frequency and intensity of weather events, Cranford's risk of catastrophic flooding is always one storm away.

The Township of Cranford has performed a preliminary review of the submitted documents provided in the Borough's website and has outlined our concerns regarding the project below. There are four regulated rivers/streams located within the Township Boundaries which experience flooding issues during rain events, namely the Rahway River, Orchard Street Branch, College Branch & Gallows Hill Road Branch. The proposed project will impact the Orchard Street Branch, which will impact the Rahway River. The Orchard Brook experiences heavy flooding during flash flood events, multiple times a year. The rainwater overflows out of the banks, spills into the intersection of West Holly and Spring Garden in Cranford and flows back into the Orchard Brook, degrading the streambank and causing scouring along the Brook.

To that effect, the Township takes flooding very seriously and has adopted stormwater management ordinances that are more restrictive than the regulations adopted by the State. The Township requires any development which exceeds a 300SF increase in impervious coverage to provide stormwater management measures to decrease the amount of runoff.

The letter provided by the Borough's Board Engineer has indicated there are several concerns regarding the proposed drainage report and stormwater management measures being proposed by the Applicant. We agree with their concerns, specifically the concern that the proposed measures do not take into account that this project is a Major Development and should be designed as a Major Development with respect to stormwater management measures. This is especially concerning because based on the stormwater management report under existing and proposed conditions, this development ultimately discharges into the Orchard Brook, whether it connects into the North Avenue stormwater system to the north of the site or the Garwood Brook to the south of the site.

This Development will impact the Orchard Brook and the flooding described above. It will be imperative that stormwater flow be controlled and minimized coming out of this proposed Development.

To minimize the impact this development could have on the Township of Cranford we are requesting the Applicant perform the following, in addition to meeting the State's minimum stormwater management requirements for Major Development:

1. The Applicant shall monitor the flow and the capacity of the existing drainage pipe and outfall location. The monitoring shall be done over an agreed upon timeframe and shall include a minimum of 3 major rain events. The Applicant shall provide a report of the findings to the Borough of Garwood's Board Engineer and The Township of Cranford. Based on the outcome of the results the Applicant shall install additional stormwater management measures to help reduce the amount of flow leaving the site.
2. The Applicant shall provide additional information regarding the stormwater drainage for the south side of the property. Any runoff leaving the site shall be retained and discharged into the municipal system using an outlet control structure which controls the amount of flow leaving the site.

Stormwater does not respect boundaries, so we are hopeful that the applicant addresses our concerns prior to construction. We appreciate your attention to this request and look forward to our communities continuing to work together for our residents. We will remain available at your convenience. Thank you for the opportunity.

Sincerely,  
Colliers Engineering & Design



Jacqueline Dirmann, P.E., C.M.E., C.F.M.  
Senior Project Manager

JMD/tva

cc: Mayor Kathleen Prunty, Township of Cranford  
Commissioner Tom Hannen, Engineering Liaison  
Township of Cranford Township Committee  
Jamie Cryan, Township Administrator  
Mayor Sara Todisco, Borough of Garwood ([STodisco@garwood.org](mailto:STodisco@garwood.org))  
Christina M. Ariemma, RMC, Borough Administrator/Clerk ([c-ariemma@garwood.org](mailto:c-ariemma@garwood.org))  
Victor E. Vinegra, P.E., Board Engineer ([victorv@hcicg.net](mailto:victorv@hcicg.net))

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