

June 18, 2026

Lisa Smith, Secretary
Mendham Borough Land Use Board
2 West Main Street
Mendham, NJ 07945

Re: Greens at Mendham Village EIS Review
Borough of Mendham
Block 1801, Lot 5
Our File No. 26MDP103

Dear Ms. Smith:

We have reviewed the proposed Greens at Mendham Village project located within the Borough of Mendham, Block 1801, Lot 5, Morris County, New Jersey. The materials provided by Bowman Consulting Group, Ltd., have been reviewed and we have the following comments regarding the proposed project:

Summary

Based on our review of the Preliminary and Final Major Site Plans for the project, the developer has avoided regulated environmentally sensitive areas that would involve additional permits.

The project is located within a 25.948-acre lot, and proposes the construction of 147 townhome units. The proposed driveway for the project would be located off of West Main Street (County Route 510). This project will also include paved roadways, parking, concrete walks, retaining walls, landscape and lighting improvements, stormwater basins, sanitary sewer pumping station, and utility improvements. McVickers Brook Tributary is located to the south of the project site and is classified as a Freshwater Category 2, Trout Production Category 1 (FW2-TPC1) waterway.

The project is located within the Highlands Planning Area, which is located outside of the Highlands Preservation Area. This project area is not subject to development limitations applicable to the Preservation Area. The Highlands Planning Area is a portion of the Highlands region that is intended to accommodate managed and appropriate development, with land use governed primarily through municipal zoning and local land use regulations. Under the NJDEP Highlands Rules, N.J.A.C. 7:38, development within this area is permitted, provided that all applicable local, County, and State regulatory requirements are satisfied.

The proposed project will increase the impervious surface cover by approximately 10.62 acres. This amount remains within the limit permitted by the ordinance, which will allow for landscaping enhancements, and preservation of open space. Additionally, stormwater collection systems are proposed within the site area to convey runoff to basins which manage water quality and groundwater recharge in accordance with local and state stormwater regulations. A review of the Stormwater Management Report provided by Bowman Consulting is provided in a separate report.

While the proposed project will involve the disturbance of some previously undeveloped land, there will be no impacts to environmentally regulated areas. It appears the proposed development has been designed to minimize adverse environmental impacts and no significant long-term adverse impacts are



expected. Minor impacts to water quality are expected as a result of soil erosion, but can be managed with the implementation of a Soil Erosion and Sediment Control Plan. Retaining walls will be used to minimize the impact of the existing slopes and impact to the existing woodland and wetlands. As well as this, a landscaping plan will be developed, and native plants and replacement trees will be utilized to the greatest extent practicable. The Environmental Performance Control section of the EIS outlines steps that will be taken to minimize environmental damage. Due to the area being in close proximity to undeveloped areas, the project will have a minimal adverse impact to the area's bird habitat. There will be no permanent significant adverse impacts to air quality as a result of the proposed project.

Permitting

The applicant has received the required NJDEP Flood Hazard Area Verification and Wetlands LOI required for this project. A Wetlands Letter of Interpretation: Line Verification was issued on February 19, 2025. The site plans show the limit of disturbance outside the 150-foot transition area buffer required for the delineated wetlands, as well as the 50-foot transition area for the isolated wetland area. Due to no proposed disturbance within the wetland areas or transition areas, no Freshwater Wetlands permits are required.

It was determined that the drainage area of McVickers Brook tributary is less than 50 acres and does not possess a flood hazard area that is regulated. The applicant applied for and received an NJDEP Flood Hazard Area Verification Approval on June 4, 2025 for this project. The approval also determined a riparian zone of 300 feet from the top of bank. The limit of disturbance for the project is outside of the riparian zone. No additional Flood Hazard Area Permits are required.

Under N.J.A.C. 7:10-11.10, the 147-unit development exceeds the 30-unit threshold, so an NJDEP permit is required for construction or modification of a public water system, including water main extensions. Given the scale of the project and anticipated number of service connections, standard permit review requirements apply. Since the site will be supplied by NJ American Water, the permitting process may be administered through the utility under a NJDEP-issued master permit, subject to utility review and approval prior to construction.

Based on the size of the development, the project requires a Treatment Works Approval (TWA) which the Ecological Impact Statement identifies. Because the project involves disturbance greater than one acre, a Soil Erosion and Sediment Control Certification must be obtained prior to the issuance of the TWA. As well as this, an Authorization to Discharge (5G3- Construction Activity Stormwater Permit) will need to be obtained due to the project exceeding 1-acre. Finally, the project's proposed stormwater management system must comply with the NJ Stormwater Management Rules (N.J.A.C. 7:8). AS noted above, a separate report will be issued on the stormwater report.

Environmental Controls During Construction

Any large-scale development such as this will result in significant site disturbance during the construction phase. In order to mitigate any potential impacts during construction, it is essential that the environmental controls that are part of the plan be properly executed. This includes monitoring the soil erosion and sediment control measures, confirming limits of disturbance and ensuring seasonal work limitations, such as tree removal are observed. The EIS outlines that operators will be directed to turn off motors while vehicles and equipment are not in use to minimize emissions.

The demolition of the existing structures on the property will be conducted in accordance with applicable regulations and best management practices to minimize environmental impacts. This includes the proper handling, disposal of demolition debris, and the implementation of dust control



measures. Any hazardous materials identified during construction should be managed and disposed of in compliance with State and Federal requirements. Construction activities will also incorporate measures to control noise and manage stormwater runoff to reduce the potential for temporary impacts to adjacent properties and environmental resources.

Environmental Performance Controls

The EIS outlines environmental performance controls that will be taken to ensure compliance with applicable regulations and minimize long-term environmental impacts. These controls include a stormwater management design, as well as a sanitary sewer service connected to the Borough's existing system. The layout of the site is designed to minimize impacts to environmentally sensitive areas such as woodland and wetland areas, while also incorporating native plantings. Energy-efficient building systems and high-efficiency appliances are proposed to reduce resource consumption. Post-development noise levels are expected to remain consistent with the existing conditions, and utility improvements are designed to support the development while limiting environmental disturbance.

Should you have any questions or comments, please do not hesitate to contact the undersigned (frossi@boswellengineering.com – 201-373-8905).

Very truly yours,

Frank J. Rossi, LSRP

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