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June 30, 2025

VIA EMAIL AND REGULAR MAIL

Ms. Jamilet Baquerizo Vite
Township of West Orange Planning Board
66 Main Street
West Orange, NJ 07052

**Re: West Essex Highlands, Inc.
Application No. PB 24-01 (Block 179, Lot 32)
Written Request for De Minimis Exception from RSIS**

Dear Ms. Vite:

This firm represents the applicant, West Essex Highlands, Inc. (“Applicant”), in connection with the above-referenced matter pending before the West Orange Planning Board. Please accept this correspondence in support of the Applicant’s request for a de minimis exception from New Jersey’s Residential Site Improvement Standards (“RSIS”) to permit the installation of sidewalks on one side of the proposed internal roadways in certain areas, pursuant to N.J.A.C. 5:21-3.1.

As previously addressed by the Applicant’s professionals, the proposed project requires a de minimis exception from the RSIS cartway standards set forth in N.J.A.C. 5:21-4.2 (Table 4.3). The roadways are designed in accordance with the standards for high intensity minor collector streets with off street parking. The applicable standard requires sidewalks on two sides of the streets, and the proposed development provides one sidewalk on Warner Road and on Road D.

Strict compliance with the aforementioned standard would result in practical difficulties regarding environmental limitations from wetlands and flood plain crossings. The development of additional sidewalks would result in the exceedance of the area of wetlands and riparian zone disturbances permitted.

Very truly yours,

/s/ Bryan D. Plocker
BRYAN D. PLOCKER, ESQ.
Bplocker@huttshim.com

cc: Diana McGovern, Esq. (via email)