



October 29, 2025

MEMORANDUM

**To: Chairman and Members of the
West Orange Planning Board**

**From: John J. Hess, PE, PP, CME
Planning Board Engineer**

Date: October 29, 2025

**Re: Application No. PB 24-01
West Essex Highlands, LLC
Response To Objector's Traffic Review
Warner Road
Block 179, Lot 32
Our File: 115.WRP0179.V01**

**CC: Geniece Gary-Adams – Director of Planning & Development/Zoning Official
Zayibeth Carballo, PE, PLS, PP, CME, CFM, CFS – Township Engineer
Diana McGovern, Esq. – Planning Board Attorney
Susan Gruel, PP – Planning Board Planner
West Essex Highlands, LLC – Applicant
Bryan D. Plocker, Esq. – Applicant's Attorney
Paul W. Anderson, PE – Applicant's Engineer**

In accordance with your authorization, our office has reviewed the following documents to provide a response to the objector's traffic review for the above referenced application:

- A set of Preliminary and Final Site Plan drawings (60 sheets) prepared by Paul W. Anderson, PE with Anderson Consulting Services of Boonton, New Jersey and bearing a latest revision date of October 1, 2024.
- A Traffic Impact Study prepared by Karl A. Pehnke, PE and Eric J. Vilorio, PE with Langan Engineering and Environmental Services, LLC of Princeton, New Jersey, dated June 19, 2024.
- A Residential Site Improvement Standards (RSIS) Traffic Review prepared by Alexander J. Litwornia, PE, PP with Litwornia Associates, Inc. of Medford Lakes, New Jersey, dated August 22, 2025.



Chairman and Members of the West Orange Township Planning Board
Re: West Essex Highlands, LLC (PB 24-01)
Response To Objector's Traffic Review

October 29, 2025
Our File No. 115.WRP0179.V01
Page 2

We have reviewed the submitted information and offer the following:

A. PROPOSED TRAFFIC DESIGN DESCRIPTION

The property in question is an irregularly shaped tract which fronts on the northerly ends of Warner Road, Kuzik Drive and Bayowski Road. It also abuts the municipal boundary with the Borough of Essex Fells to the north and west, the municipal boundary with the Township of Verona to the north and the West Essex Highlands Condominium development to the south. The property in question is located in the IH-1 Inclusionary Housing District and has an area of 5,245,870 sf or approximately 120.429 acres. The property is currently vacant and wooded and is traversed by several stream corridors. Development of the property is subject to the terms and conditions in a Settlement of Litigation Agreement between West Essex Highlands, LLC, the Township of West Orange and the West Essex Condominium Association, Inc.

The Applicant is seeking Preliminary and Final Site Plan approval to construct a residential development containing 496 residential apartments, 100 of which will be set aside for low and moderate income families. The Applicant proposes to construct six (6) apartment buildings, a clubhouse, a maintenance building, a dog kennel and a dog park.

Access will be provided to the site via extensions of Warner Road and Kuzik Drive. In addition, an emergency access is proposed to Howell Drive. Further, the Applicant has requested a de minimis exception from the Residential Site Improvement Standards (RSIS) to allow the closure of Kuzik Drive to regular traffic and provide emergency access only.

Finally, as part of the Stipulation of the Litigation Agreement, the Applicant is required to install a traffic signal at the intersection of Oval Road and Eagle Rock Avenue.

B. OBJECTOR'S TRAFFIC REVIEW SUMMARY

At the request of the project objectors, We Care NJ Corp., Alexander J. Litwornia, PE, PP with Litwornia Associates, Inc. completed a technical review of the Traffic Impact Study and prepared a Residential Site Improvement Standards (RSIS) Traffic Review dated August 22, 2025 to outline the objector's concerns regarding traffic management.

Based on our review, we have the following to offer for Board consideration. For clarity purposes, review comments taken from the Residential Site Improvement Standards (RSIS) Traffic Review prepared by Alexander J. Litwornia, PE, PP with Litwornia Associates, Inc., dated August 22, 2025, are shown in *italics* with comments from our office shown in **bold**.



Chairman and Members of the West Orange Township Planning Board
Re: West Essex Highlands, LLC (PB 24-01)
Response To Objector's Traffic Review

October 29, 2025
Our File No. 115.WRP0179.V01
Page 3

Residential Site Improvement Standards (RSIS) Traffic Review prepared by Alexander J. Litwornia, PE, PP with Litwornia Associates, dated August 22, 2025:

Conclusions

1. *The Traffic from One Cul-de-Sac Roadway is Excessive.*

"The RSIS states that a cul-de-sac must have a maximum of 250 vehicle trips per day. The application will create a single cul-de-sac with an estimated daily traffic of over 5,100 trips per day when existing development is taken into account. This would be created with only one way in or out of the entire complex."

The average daily traffic for a 496-unit mid-rise apartment project is approximately 2,728 trips which requires a second means of ingress and egress.

The proposed development includes two means of ingress and egress via Warner Road and Kuzik Drive as well as emergency access via Howell Drive. Therefore, as indicated within the Applicant's Traffic Engineer's testimony and Traffic Impact Study, the roadways should be classified as minor collector roadways with total traffic volume that should not exceed 3,500 trips.

The Applicant has requested a de minimis exception from RSIS to allow for the closure of Kuzik Road, except for emergency vehicles. If the exception is granted by the Planning Board, Warner Road would be classified as a multi-family cul-de-sac with a maximum of 1,000 average daily trips which would be exceeded by the proposed development, thereby requiring the de minimis exception, as detailed within the Applicant's request for the de minimis exception.

2. *The RSIS Must Be Met – This Is Still a Cul-de Sac.*

"The amount of traffic to be utilizing Warner Road from the proposed development would be way in excess of the 1,000 trips per day that RSIS allows. It would be approximately 2,728 trips or about 2.7 times the allowed volume for a multi-unit cul-de-sac and quadruple (4x) the amount of traffic at one point at a loop roadway."

As indicated above, the Applicant has submitted a de minimis exception request for the closure of Kuzik Drive, except for emergency vehicles, to the Planning Board for consideration. The Applicant's written request for the de minimis exception indicates that "the opening of Kuzik Drive to the normal flow of traffic to and from the proposed residential community will exact an unnecessary and undue hardship on the existing residents of the West Essex Highlands Condominium along Kuzik



Chairman and Members of the West Orange Township Planning Board
Re: West Essex Highlands, LLC (PB 24-01)
Response To Objector's Traffic Review

October 29, 2025
Our File No. 115.WRP0179.V01
Page 4

Drive.” Further, the request indicates that “public safety is not compromised because Kuzik Drive will accommodate emergency access.”

3. *The Intersection of Eagle Rock Avenue and Oval Road Must Be Signalized.*

“The applicant should address the intersection of Eagle Rock Avenue and Oval Road as an unsignalized intersection as the traffic signal is not yet installed, and while planned, it is not guaranteed that this will happen. If this occurs, it may not occur prior to the development being built out and occupied. It is not a part of this application.”

As indicated within the Applicant’s Traffic Impact Study, a traffic signal is proposed at the intersection of Eagle Rock Avenue and Oval Road which is expected to operate at a Level of Service A (LOS A). LOS A represents the best operating conditions; whereas LOS F represents the worst operating conditions.

If the development is granted approval by the Planning Board, the installation of the traffic signal at Eagle Rock Avenue and Oval Road will be required.

4. *A Left Turn Lane Should Be Installed on Eagle Rock Avenue at Oval Road.*

“The applicant should install a left turn lane on Eagle Rock Avenue. The traffic volumes warrant this improvement to assure safe entry into the development. This should be addressed by the applicant.

As indicated within the Applicant’s Traffic Impact Study, Eagle Rock Avenue eastbound will be widened to provide a left turn lane into Oval Road, a through lane and a through/right turn lane into Crestmont Country Club.

Further, as indicated above, if the development is granted approval by the Planning Board, the installation of the proposed traffic signal and associated improvements at Eagle Rock Avenue and Oval Road will be required.

5. *The Roadway Width should be improved at the divided section to a minimum of 20 feet on each side of the median.*

The Applicant is not required to widen the roadway widths of adjacent existing roadways, in accordance with RSIS Clarification #3.



Chairman and Members of the West Orange Township Planning Board
Re: West Essex Highlands, LLC (PB 24-01)
Response To Objector's Traffic Review

October 29, 2025
Our File No. 115.WRP0179.V01
Page 5

6. *Road slopes are higher than RSIS allows.*

"Steep slopes prevent vehicles from stopping safely and will contribute to accidents. Emergency vehicles will have difficulty traversing up the slope in harsh winter weather leaving approximately 1,000 people vulnerable to health emergencies helpless. Intersections are safety hazards on level roads but much worse when the main travel road is sloped braking distances are greater due to wet or icy conditions therefore stopping is not normal."

Pursuant to RSIS Table 4.6, the maximum allowable grade for a minor collector roadway is 10%. The Preliminary and Final Site Plan drawings indicate proposed roadway slopes that are compliant with this standard.

7. *ADA Requirements must be met.*

If the development is granted approval by the Planning Board, the Applicant will be required to provide revised plans verifying compliance with ADA requirements and will be responsible to ensure that installed infrastructure maintains ADA compliance prior to the completion of the construction phase.