

STAFF REPORT

PLEASE REFER TO DRCC # WHEN SUBMITTING
ADDITIONAL DOCUMENTS



DRCC #: 25-4051A

DATE: August 11, 2025

PROJECT NAME: NJEDA -- Maternal and Infant Health Innovation Center

Latest Submission Received: August 11, 2025

Applicant:

New Jersey Economic Development Authority (NJEDA)
36 West State Street
P.O. Box 90
Trenton, NJ 08625-0090
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Engineer:

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Project Location:

Road	Municipality	County	Block(s)	Lot(s)
1 Pennington Road (N.J. State Highway Route No. 31)	Trenton City	Mercer	3901	48
			3902	1
			3903	1

Jurisdictional Determination:

Zone A	Major	Governmental
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Subject to Review for:

Drainage	Visual	Traffic	Stream Corridors
X	X	X	

**THIS STAFF REPORT IS ISSUED AS A GUIDE TO APPLICANTS IN
COMPLYING WITH DRCC REGULATIONS. IT IS NOT AN APPROVAL.**

PO BOX 539

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www.nj.gov/dep/drcc/

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NO CONSTRUCTION SHALL BEGIN UNTIL A CERTIFICATE OF APPROVAL HAS BEEN ISSUED.

Documents Received: Site Plans (18 sheets) dated April 30, 2025, last revised August 8, 2025; Stormwater Management Report including a Geotechnical Report as Appendix B dated February 24, 2025, last updated July 22, 2025; Traffic Impact Report dated March 17, 2025, prepared by Pennoni. Boundary and Topographic Survey (1 sheet) dated January 3, 2025, prepared by CME Associates. Architectural Plans (10 sheets) dated March 24, 2025; Architectural Rendering with an expiration date of July 31, 2025; prepared by Ballinger. Planting Plan (1 sheet) dated June 27, 2025, prepared by Sikora Wells Appel. Site Lighting (1 sheet), prepared by The Lighting Place.

Staff comments continued below.

The application is complete and shall be presented to the Commission for their action with a staff recommendation of approval at the August 20, 2025, meeting based upon the following analysis:

Existing Conditions: The project area consists of three lots totaling 113,866 square feet (2.614 acres) located in the Five Points neighborhood of the City of Trenton, Mercer County, approximately 260 feet north of the Delaware and Raritan Canal at its closest point and within Commission Review Zone A.



The project site is bounded by Pennington Avenue followed by detached and semi-detached residential developments on comparatively small lots to the north, North Warren Street followed by the Trenton Battle Monument and associated city park to the east, Ringold Street followed by the Henry J. Austin Health Center to the south, and Ringold

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Street and Titus Avenue followed by attached residential development and the Trenton Reading Senior Citizen Center to the west.

In the existing condition, the site is vacant land consisting mostly of lawn with some gravel. A review of historic aerial imagery indicates that a large building was demolished on the site after 1999 but before 2002. The site was occupied by several buildings and rail yard infrastructure related to the Reading Railroad for most of the 20th century (See “Historical Background” below).

The Commission reviewed one previous project application at the site. In 2010, an application was filed by the New Jersey Schools Development Authority for a project to construct an early childhood center. That application was found deficient in several respects, and no further action was taken on the project (DRCC #10-4051).

Proposed Project: The applicant proposes to construct a 66,861 square-foot Maternal and Infant Health Innovation Center (MIHIC), along with associated paved parking area and stormwater management infrastructure. According to the NJEDA website, the MIHIC is intended to serve as “an anchor for equitable provision of maternal and infant health care services, social services and wraparound supports, data analysis and first-in-class research on maternal health care and equity in care, a training and education site for the perinatal workforce, a catalyst of new innovations to drive improved maternal and infant health outcomes, and as a central hub for New Jersey’s stakeholders which include mothers and trusted community actors dedicated to improving the health of New Jersey’s babies and mothers.”

The proposed MIHIC building would run the length along North Warren Street and Pennington Avenue to Ringold Street, and west from North Warren Street approximately 130 feet. The project would result in the creation of 36,460 square feet (0.837 acre) of impervious surface coverage and would disturb 123,841 square feet (2.843 acres) of land.

Stream Corridor: The project site is located within the Central Delaware watershed area. The headwaters of a tributary to the Delaware and Raritan Canal are located approximately 1,250 feet to the west of the property. Other than this tributary, the nearest major watercourse is Assunpink Creek and its 100-year floodplain, which lies more than 2,500 feet to the southeast of the site. No other stream lies near the site, so no stream corridor is present onsite. Therefore, this project is not subject to stream corridor impact review pursuant to N.J.A.C. 7:45-9.1(a).

Stormwater Outfall: Based upon the location of the site, the site will drain into the Delaware and Raritan Canal by means of stormwater conveyance piping to the canal located to the south of the site. N.J.A.C. 7:45-8.3 directs specific standards for outfalls discharging to the canal. The applicant proposes new impervious surface coverage or sources of new stormwater that tie into drainage systems that discharge to the canal. N.J.A.C. 7:45-8.3(a)2 directs that new sources of stormwater that tie into drainage systems that discharge to the canal are prohibited. The applicant will also be required to meet the 95 percent (%) total suspended solids (TSS) removal rate requirement of N.J.A.C. 7:45-8.3(a)5ii for any new or renewed vehicular drive surfaces. The stormwater runoff from the

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project will be treated to 95% TSS removal utilizing green infrastructure (GI). However, the project is not capable of infiltrating any increases in stormwater runoff volume due to the condition of the existing soils onsite (See below). The applicant has, therefore, requested a waiver of strict compliance from the stormwater runoff standards pursuant to the criteria at N.J.A.C. 7:45-12.6 with justifications.

Pursuant to N.J.A.C. 7:45-12.6(b), an application for a waiver to install a new outfall or discharge stormwater into waters or conduits that flow into the Delaware and Raritan Canal shall include documentation to show that the prohibition of such discharge will result in an extreme economic hardship, or that the project will serve a compelling public need as described at N.J.A.C. 7:45-12.3.

In this case, the applicant has contended that the project serves a compelling public need. N.J.A.C. 7:45-12.3(c) provides that an applicant shall be deemed to have established compelling public need if the applicant demonstrates, based on specific facts, that:

1. The proposed project will serve an essential public health or safety need;
2. The public health and safety require the requested waiver;
3. The proposed use is required to serve existing public health or safety needs; and
4. There is no alternative available to meet the established public health or safety need.

With respect to the first and second criteria noted hereinabove, Commission staff notes that the applicant has published considerable data which indicates that the proposed MIHIC would serve an essential public health need and that the public health requires the requested waiver. The applicant's published materials note that New Jersey has among the widest maternal and infant health disparities in the United States. For example, 24.1 mothers die in childbirth in New Jersey for every 100,000 live births, compared with 20.1 nationally. It is 6.6 times more likely for an African-American mother to die in childbirth compared with a white mother.

With respect to the third criteria noted hereinabove, the January 2021 Nurture NJ Strategic Plan recommends the establishment of "...a Center in the state capital (Trenton) that focuses on innovation and research in maternal and infant health through partnerships with the state's academic, funder, business, and faith communities." The plan further notes that the location of the MIHIC in Trenton would impact a "high need community" as well as influence the statewide (and national) policy framework, and that from 2016 to 2018, Mercer County had the fourth highest number of Black infant deaths (34 out of 383 statewide) and second highest Black infant mortality rate (13.1 per 1,000 births) among all New Jersey's 21 counties.

With regard to the fourth criteria, the applicant has demonstrated that the onsite soils are Hydrologic Soil Group (HSG) Tyle "D" soils, and cannot provide infiltration, which is confirmed through soil testing conducted in accordance with Chapter 12 of the NJ Stormwater BMP Manual. As such, the project site cannot feasibly be designed to retain the increase in runoff volume generated by the project onsite. Commission staff also notes that adherence to the required higher standard would result in an inability to develop the property with any impervious surface coverage, since such coverage would result in an

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increase in the volume of stormwater entering the canal. Thus, the property could not be developed if strict adherence to the higher standard were required.

N.J.A.C. 7:45-12.6(d)2 provides that if the Commission finds, based on the applicant's submissions, that the proposed new discharge cannot be treated to meet the Commission standard because the project serves a compelling public need, the applicant shall include in its project a cash donation to a mitigation bank administered by the New Jersey Water Supply Authority (NJWSA) to be used for water quality improvement projects for the Delaware and Raritan Canal with the equivalent mitigation benefit.

The applicant has proposed a cash donation in the amount of \$61,558 for the NJWSA to use for water quality improvements along the canal. The cash donation was calculated by determining contractor costs for the hypothetical construction of 4,820 square feet of porous pavement, which is the area that was determined to be required to mitigate for the increase in runoff volume for the proposed project. The applicant has submitted stormwater calculations and construction cost calculations, which have been reviewed by Commission staff.

Commission staff has reviewed the applicant's waiver request pursuant to the criteria at N.J.A.C. 7:45-12.6(b) and has determined that the project is eligible for a waiver of strict adherence from the Commission's stormwater runoff quantity standard at N.J.A.C. 7:45-8.3(a)2. The project is not capable of infiltrating the increases in stormwater runoff volume due to the existing site conditions and soils onsite which are not amendable to infiltration. Commission staff has also reviewed the stormwater calculations and construction cost calculations related to the determination of appropriate mitigation and has determined that the submitted calculations are acceptable.

Stormwater Runoff Quantity: The proposed improvements will result in an increase in the amount of impervious coverage area on the site and an associated increase in stormwater runoff if unmitigated. The submitted application proposes to control stormwater runoff flow and volume increases via the incorporation of a combination of stormwater best management practice (BMP) measures, consisting of one underground conveyance system, two aboveground small-scale bioretention basins with underdrains, and one underground basin with underdrain.

The existing conditions at the project site have been evaluated at three separate drainage areas and three study points-of-analysis (POI-A, POI-B, POI-C) as follows:

- Existing Drainage Area A to Pennington Avenue: This portion of the tract is comprised mostly of the existing sidewalk and the grass area between the sidewalk and the curb along the Pennington Avenue right-of-way (ROW). No drainage structure was observed along the frontage of the site. POI-A is located at the intersection of Titus Avenue with Pennington Avenue.
- Existing Drainage Area B to North Warren Street: This portion of the tract consists mostly of the existing sidewalk and the grass area between the sidewalk and the curb along the ROW and a portion of the vacated Ringold Street. No drainage structure was

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observed along the frontage of the site. POI-B is located at the intersection of vacated Ringold Street with North Warren Street.

- Existing Drainage Area C to North Willow Street: This portion of the tract consists of the majority of the site, consisting of the existing grass area, the parking, and the vacated Ringold Street. The site generally drains toward Titus Avenue and Block 3903, Lot 1 (owned by the City of Trenton). Ultimately, the runoff is collected and routed to North Willow Street. Under existing conditions, there are no stormwater management facilities on site. The stormwater conveyance system starts at the end of Titus Avenue and extends through Block 3903, Lot 1, to a stormwater manhole located on North Willow Street. POI-C located at the stormwater manhole located on North Willow Street.

The proposed conditions at the project site have been maintained and evaluated at three separate drainage areas and three POAs (POI-A, POI-B, POI-C) as follows:

- Proposed Drainage Area A to Pennington Avenue: This portion of the tract consists mostly of the proposed sidewalk and the grass area between the sidewalk and the curb along the ROW. POI-A is located at the intersection of Titus Avenue with Pennington Avenue.
- Proposed Drainage Area B to North Warren Street: This portion of the tract consists of the proposed sidewalk and the grass area between the sidewalk and the curb along the ROW. POI-B is located at the intersection of vacated Ringold Street with North Warren Street 2.
- Proposed Drainage Area C to North Willow Street: This portion of the tract consists of the majority of the site. The stormwater runoff is collected by the proposed stormwater conveyance system, routed to the aboveground or the subsurface stormwater management basins, and ultimately connects to the existing stormwater manhole located on North Willow Street. POI-C is located at the stormwater manhole located on North Willow Street.

For stormwater leaving the site at POI-A and POI-B, post-construction runoff hydrographs for the 2-, 10- and 100-year storm events do not exceed, at any point in time, the pre-construction runoff hydrographs for the same storm events. The stormwater management measures for POI-C have been designed so that, for the overall site analysis, the post-construction peak runoff rates for the 2-, 10- and 100-year storm events will be no greater than 50%, 75% and 80%, respectively, of the pre-construction peak runoff rates. The submitted calculations utilized the Natural Resource Conservation Service (NRCS) Technical Release No. 55 (TR-55) hydrologic methodology, NOAA Region C unit hydrograph rainfall distribution, and current New Jersey 24-hour rainfall frequency data for Mercer County to compute peak runoff flow rates and volumes.

However, as a result of onsite permeability testing, the proposed project cannot be designed to meet the specific runoff quantity standards at N.J.A.C. 7:45-8.3(a)2. Although the proposed stormwater management measures will provide enough peak flow attenuation to

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meet the specific runoff quantity standards at N.J.A.C. 7:45-8.6(a)1, Commission staff agrees that, as a result of the existing soil conditions onsite, the project cannot be designed to meet the Commission's higher stormwater runoff quantity standards at N.J.A.C. 7:45-8.3(a)2. As such, the applicant proposes the Commission grant a waiver of strict compliance from the stormwater runoff quantity standards pursuant to the criteria at N.J.A.C. 7:45-12.6, as well as proposed mitigation that are noted in the "Stormwater Outfall" section hereinabove.

Water Quality: The Commission requires that all proposed full-depth pavement, including newly constructed and reconstructed parking and access drives that are being renewed, shall comply with water quality standards at N.J.A.C. 7:45-8.7. As noted above, portions of the site may drain to the Delaware and Raritan Canal. Therefore, for stormwater draining to the canal, reduction of the post-construction load of TSS in stormwater runoff generated from the water quality design storm by a rate of 95% of the anticipated load from the developed site, expressed as an annual average, may be required.

Based upon the submitted application, 1.32 acres of new or reconstructed motor vehicle pavement surface areas are being proposed onsite. The submitted design proposes to treat for water quality by incorporating a combination of stormwater BMP measures. The BMP measures will include bio-retention basins with underdrains having the first orifice above water quality elevation in series with GI manufactured treatment devices (MTD). These BMP measures are designed in series to provide the required 95% TSS removal rate.

The proposed MTDs would consist of four Filterra HC Bio-retention Systems by Contech Engineered Solutions, a NJDEP approved GI with a certified TSS removal rate of 80%. The NJDEP certifies the use of the Filterra HC stormwater treatment unit by Contech Engineered Solutions LLC at a TSS removal rate of 80% when designed, operated, and maintained in accordance with the information provided in the Verification Appendix and the following conditions in the February 12, 2021, NJDEP letter.

Small-scale bio-retention systems are stormwater management facilities used to address the stormwater quality and quantity impacts of land development. A system consists of a soil bed planted with vegetation; it can be underdrained or runoff can infiltrate into the subsoil. Pollutants are treated through the processes of settling, plus uptake and filtration by the vegetation. Pollutants are also treated within the soil bed through infiltration. The TSS removal rate is 80% to 90%, and dependent upon the depth of the soil bed and the type of vegetation selected. Site-tolerant grasses with a 24-inch-thick soil depth have been proposed for each of the underdrained small-scale bio-retention basins (Basin C2 and Basin C3).

The project is proposing the small-scale bio-retention basins with underdrains having the first orifice above water quality elevation in series with GI MTDs to provide the required 95% TSS removal rate. Based upon a review of the proposed stormwater design, the stormwater quality measures have been designed in accordance with the requirements of N.J.A.C. 7:45-8.7 and N.J.A.C. 7:45-8.3(a)5ii, respectively.

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Groundwater Recharge: The Commission's regulations require that stormwater management measures maintain 100% of the average annual pre-construction groundwater recharge volume for the site, or that any increase of stormwater runoff volume from pre-construction to post-construction for the 2-year storm is infiltrated. A subsurface geotechnical evaluation was performed at the site to confirm the onsite soil types. Based upon the soil conditions encountered onsite, it was determined that the site soils should be classified as HSG Type "D" soils. The soil testing was performed in accordance with Chapter 12 of the NJ Stormwater BMP Manual in support of reclassifying the onsite soils to an HSG rating of Type "D."

Based upon a review of the submitted information, Commission staff agrees that the evaluation supports the HSG Type "D" soil classification. Therefore, the Commission considers that the project will meet the groundwater recharge requirements of N.J.A.C. 7:45-8.5, since the site is not currently providing recharge in the existing condition.

Non-Structural Methods: The Commission requires that non-structural stormwater management strategies be incorporated into the stormwater design of a development project. To assist in determining that sufficient non-structural stormwater management strategies have been incorporated into the project site design "to the maximum extent practical," the NJDEP Nonstructural Strategies Point System (NSPS) spreadsheet has been completed for this project. The NSPS results indicate that the ratio of proposed to existing site points (82%) exceeds the required site points ratio (70%). Therefore, the project has proposed non-structural measures that are adequate, and the project is designed in accordance with N.J.A.C. 7:45-8.4.

Stormwater Management Maintenance Plan: A stormwater management operation and maintenance plan has been submitted for the BMP elements proposed for the MIHIC project. The plan includes maintenance details for all of the proposed BMP measures. The plan has been prepared in accordance with the requirements of N.J.A.C. 7:45-8.8.

Visual, Historic & Natural Quality Impact: N.J.A.C. 7:45-10.2 directs that the Commission shall review all projects in Zone A to determine if the project is in accord with the goals for the Delaware and Raritan Canal State Park as defined in the park's Master Plan. The visual, historic, and natural quality impact review is intended to assure that development within Zone A is not harmful to the character of the environmental types identified in the Master Plan as comprising the park.

The proposed project is located in an Urban canal environment as described in the Master Plan. The Urban canal environment is characterized at N.J.A.C. 7:45-10.2(a) by the enclosure of the canal by dense development. The Master Plan at pages 18 and 19 notes that the canal is located in the center of an urban area, with residences, parking lots, alleys and streets, commercial properties, and a lightly used concrete park found along the canal embankment. The plan calls for improvement of the park multiuse trail and for the establishment of additional links between the park and the city. Therefore, nothing with respect to the proposed MIHIC is inconsistent with these goals.

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The provisions of N.J.A.C. 7:45-10.3(a), which discourage major projects from certain canal environments in Zone A and authorize the Commission to require specific compensatory measures that mitigate the project's potential for harmful impact on the park, are inapplicable to the project, which is located in an Urban canal environment.

The provisions of N.J.A.C. 7:45-10.3(b), which discourage minor projects from certain canal environments in Zone A and authorize the Commission to require specific compensatory measures that mitigate the project's potential for harmful impact on the park, are inapplicable to the project, which is a major project.

N.J.A.C. 7:45-10.4(a) directs that projects in Zone A shall be set back from the Delaware and Raritan Canal State Park sufficiently far so that the winter visual and natural quality of the park are not adversely affected. In the Urban canal environment, there are no minimum setbacks except as may be prescribed by municipal ordinances. The project is located approximately 260 feet from the Delaware and Raritan Canal. Therefore, the project is in compliance with this requirement.

N.J.A.C. 7:45-10.4(b) directs that projects in Zone A shall maintain a reasonable height and scale relationship to nearby structures or vegetation. For Urban canal environments, the height of structures may vary according to the height of existing structures that have a visual relationship to the proposed structure. The applicant has submitted architectural plans which appear to indicate that the maximum height of the proposed MIHIC building would be feet 54.5 feet above existing grade. Commission staff observes that two buildings in particular within the vicinity of the project site exceed this height, most notably the 11-story apartment building located at 260 North Willow Street (Block 3901, Lot 2), and the 6-story parking garage at 34-64 Bank Street (Block 3803, Lot 2.01). Therefore, Commission staff has determined that the project is in compliance with this requirement.

N.J.A.C. 7:45-10.4(c) directs that for projects in Zone A, the exterior appearances of a project shall be in keeping with the character of the Delaware and Raritan Canal State Park's individual environments. Specifically, colors used shall harmonize with the man-made or natural surroundings of the project and shall be typical of colors found in the park environment, and building materials and textures shall harmonize with the surrounding man-made and natural materials.

The applicant has submitted a narrative which states that the MIHIC exterior would be comprised of neutral-colored ultra high-performance concrete (UHPC) panels, which are intended to create a harmonious relationship with the adjacent Trenton Battle Monument and the surrounding park. The neutral tonal panels match the white to tan exteriors of nearby buildings such as the monument, the Henry J. Austin Health Center, the Greater Mount Zion A.M.E. Church, and the supplemental white paneling of the residential neighborhood. The applicant notes that the UHPC panels have a natural texture allowing for strong connection to the monument park with a durable and simple finish.

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The applicant's submission notes that the proposed MIHIC design balances solid materials with the strategic use of glass wall systems to provide a view into a new public space while providing an appropriate level of privacy for the center's programs. The building would also have a green roof system for the sustainability benefits as well as the establishment of a connection with the adjacent monument park plaza open space.

N.J.A.C. 7:45-10.4(d)1 directs that electric, telephone, cable television, and other such lines and equipment shall be underground or otherwise not visible from the Delaware and Raritan Canal State Park. The proposed MIHIC building would be mostly screened from the park, since it would be situated perpendicular to the multiuse trail. Therefore, the project is in compliance with this requirement.

The provisions of N.J.A.C. 7:45-10.4(d)2, which direct that exposed storage areas, out-buildings, exposed machinery service areas, parking lots, loading areas, utility buildings, and similar ancillary areas and structures shall either be completely concealed from view from the Delaware and Raritan Canal State Park or designed to minimize their visual impact on the park, are inapplicable to the project.

N.J.A.C. 7:45-10.4(d)3 and 4, respectively, regulate the dimensions and location of commercial signs or outdoor advertising structures. The applicant's submission indicates that the proposed MIHIC would have building identification signage located on the east and west arrival points, which would not be freestanding. The signage would consist of non-illuminated 6.0 by 8.0-inch stainless steel pin letters that would identify the center. Commission staff observes that the proposed signage is not commercial in nature and would be located perpendicular and not parallel to the Delaware and Raritan Canal State Park multiuse trail. Therefore, the project is in compliance with this requirement.

N.J.A.C. 7:45-10.4(d)5 directs that wherever possible, natural terrains, soils, stones, and vegetation should be preserved. New vegetation, stones, and soils should be native to the environment in which they are placed. The applicant has submitted a landscaping plan consisting of the following species:

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Scientific name	Common name	Quantity	Native
Ornamental trees:			
<i>Acer rubrum</i>	Red Maple	10	DRCC
<i>Gymnocladus dioicus</i>	Kentucky Coffeetree	3	DRCC
<i>Liquidambar styraciflua</i>	Sweetgum	2	DRCC
<i>Liriodendron tulipifera</i>	Tulip tree	5	DRCC
<i>Nyssa sylvatica</i>	Tupelo	5	DRCC
<i>Ostrya virginiana</i>	American Hornbeam	2	DRCC
<i>Platanus occidentalis</i>	American Sycamore	1	DRCC
<i>Quercus imbricaria</i>	Shingle Oak	1	USDA
<i>Quercus phellos</i>	Willow Oak	3	USDA
<i>Ulmus Americana</i> 'Princeton'	American Elm	2	DRCC
Evergreen trees:			
<i>Ilex opaca</i>	American Holly	3	DRCC
Ornamental trees:			
<i>Cercis canadensis</i>	Eastern Redbud	12	DRCC
<i>Cornus florida</i>	Dogwood	3	DRCC
Deciduous shrubs:			
<i>Aronia melanocarpa</i>	Chokeberry	120	DRCC
<i>Clethra alnifolia</i>	Summersweet	54	DRCC
<i>Cornus sericea</i>	Red Osier Dogwood	75	USDA
<i>Hamamelis virginiana</i>	Witch Hazel	4	DRCC
<i>Hydrangea arborescens</i>	Wild Hydrangea	143	DRCC
<i>Ilex verticillata</i>	Winterberry	125	DRCC
Evergreen shrubs:			
<i>Ilex glabra</i>	Inkberry Holly	190	DRCC
<i>Viburnum acerifolium</i>	Maple Leaf Viburnum	4	DRCC

The project is, therefore, in compliance with this requirement.

N.J.A.C. 7:45-10.4(d)6 directs that projects that are located in any officially designated Federal, State, or local historic district or site shall be assessed for their impact upon that district or site. Recommendations to avoid, minimize, and/or mitigate the impacts of a project on a listed property shall be made in consultation with the New Jersey Historic Preservation Office (SHPO) and based upon the United States Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings.

The project is located in close proximity to the Philadelphia and Reading Railroad Freight depot, the Trenton Battle Monument, and the Delaware and Raritan Canal Historic District, each of which is listed in both the New Jersey and National Registers of Historic Places.

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With respect to the Philadelphia and Reading Railroad Freight depot, the applicant's submission states that given the demolition of the Reading passenger station to the southeast, and the removal of many of the row houses and smaller industrial buildings to the north and south on Titus Avenue, Ringold Street, Warren Street, and Tucker Street, the former freight depot has low integrity of setting, and that this diminished setting is not essential to convey the station's architectural and industrial significance.

With respect to the Trenton Battle Monument, the applicant's submission concedes that the proposed MIHIC would introduce an institutional building of modern architectural design into the area adjacent to the monument. However, the applicant notes that the surroundings of the monument in the Five Points area have been altered greatly over the years. Many of the surrounding row houses and smaller industrial buildings dating to the monument's period of significance are no longer extant, resulting in a generally low integrity of setting. Thus, the applicant contends that the proposed building within the setting would not diminish the overall integrity of design, materials, and workmanship or the significant features of the monument that enable the historic property to convey its architectural and artistic significance.

The project area lot is partly located within the boundaries of the Delaware and Raritan Canal Historic District, which encompasses the canal bed and all structures within 300 feet of the centerline of the canal. However, the proposed MIHIC building itself would be mostly located beyond the boundaries of the district. Commission staff also observes that the proposed building would be situated perpendicular to the park multiuse trail, which crosses both North Warren and North Broad streets and, therefore, would not create a visual impact upon the park. Finally, the applicant's submission observes that while the top of the proposed MIHIC building might be partially visible from select vantages within a small portion of the district along its northern end, it would not be visible from the canal. Additionally, the applicant notes that several modern intrusions already exist between the canal and the proposed building, and that the addition of the MIHIC building would not diminish the integrity of the canal historic district's character-defining features.

On December 23, 2024, the SHPO noted that treatment of historic and archaeological resources were addressed in 2009 as part of a previous review conducted for the proposed early childhood center project. The SHPO further noted that, at that time, effects to archaeological resources had been appropriately mitigated, and no further consideration of historic and archaeological resources was required. The SHPO concluded by stating that it had reviewed the MIHIC project submission and believed that it was consistent with their prior review. Consequently, the SHPO did not indicate any additional concerns and stated that no further consideration of historic or archaeological resources was necessary.

Given the foregoing, Commission staff determines that the project does not impose an adverse impact upon any officially designated Federal, State, or local historic district or listed property and is, therefore, in compliance with this requirement.

Historical background: The Five Points area of Trenton takes its name from the star-shaped configuration created by the convergence of five streets: Princeton, Pennington and Brunswick avenues, and North Warren and North Broad streets. The Five Points served

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as an entrance point to the city for most of Trenton's early history, as both gateway and community, dating to the 18th century when King (now North Warren) and Queen (now North Broad) streets were first laid out to converge north of the town leading to New Brunswick, Pennington, and Princeton.

By the time of the American Revolution, the Five Points was a small community of dwellings, shops and taverns. During the First Battle of Trenton, General Washington and Major General Greene and his troops marched down Pennington Road and set up six cannons at the Five Points. From this vantage point, Colonial artillerymen directed fire down both King and Queen Streets toward the Hessians stationed in the center of the town.

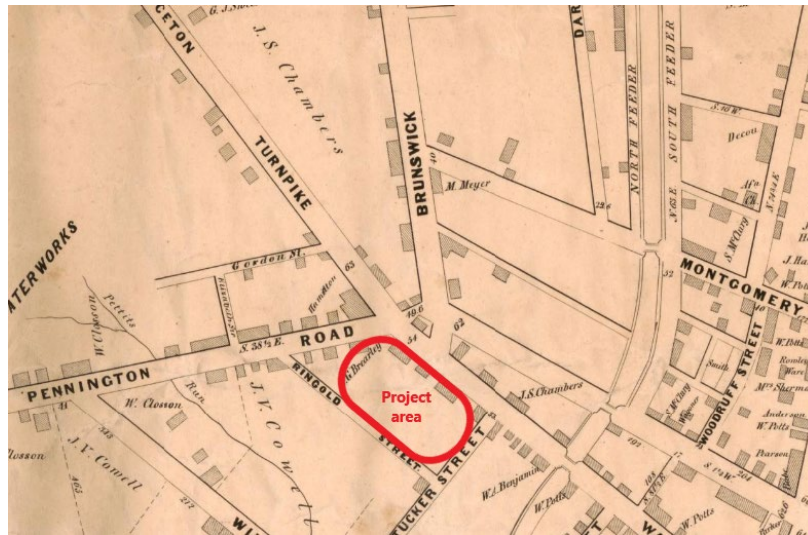


(Five Points circa 1776)

During the 19th century, the Five Points became a center for artisans and early small-scale industries, including a pottery, a tannery, and a coffee roasting and spice grinding mill. Given its location as a commercial and popular entrance to the city, it was perhaps natural that transportation-related infrastructure became located in the area. The construction of the Delaware and Raritan Canal created a source of water for industry. The canal also formed a northern boundary for the developed part of the city and, as a consequence, the area north and west of the Five Points remained largely rural and agricultural until the 1850s.

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(Sidney, 1849)

The Belvidere-Delaware Railroad was constructed in 1852, and the Delaware and Bound Brook Railroad branch (later a Reading Company line) followed in 1876. Twelve years later, the Reading Railroad constructed a spur line to serve the industries established in this area. The freight depot, a long, elegant brick structure with a distinctive two-story gable and office wing, is the only surviving 19th century railroad terminal in Trenton and has been readapted for use as a senior citizen center. The passenger terminal (see image below) was demolished and is now the site of the Henry J. Austin Health Center.



(Reading Passenger Terminal)

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(Freight depot. 1979)

The second half of the 19th and early 20th century saw the development of closely spaced commercial and residential properties in the area as land associations and private developers acquired properties. The construction during this era consisted mostly of two- to three-story brick buildings containing first-floor shops and residences above. On streets such as North Warren Street, and Brunswick, Princeton and Pennington Avenues, clusters of more sophisticated freestanding twin and row houses were constructed during this period. Although development in the Five Points was primarily residential in nature, the Trenton Beef Company (later Swift and Company) took advantage of the Reading spur line to establish its office immediately to the north of the railroad's freight house on Ringold Street, which remained until 1950.



(Trenton Beef/Swift circa 1930-1940)



(View from top of Battle Monument, circa 1910. Notice the swing bridges over the canal.)



(circa 1930)



(1932)



(1941)

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(1961)

During the second half of the 20th century, many of the buildings formerly located within the project area were abandoned during this period and later demolished. By 1982, there were only a handful of buildings still standing in the project area, which were subsequently demolished over the ensuing two decades. Other than the former Reading freight depot, there are no standing historic buildings in the project area.

Traffic Impact: N.J.A.C. 7:45-111.1 directs that the Commission shall review major projects in Zone A for their traffic impact on roads that enter the Delaware and Raritan Canal State Park or any part of Zone A. The applicant shall submit a traffic impact study that shows the amount of additional traffic generated by the project and the directions in which this traffic will move. If the Commission determines that the additional traffic will have an adverse impact on the park, the applicant shall use any feasible planning techniques that will direct any additional traffic away from the park. If the Commission is satisfied that there are no feasible planning techniques other than as set forth in the project proposal that can direct any additional traffic away from the park, the project shall be approved for traffic impact review.

The applicant has submitted the required traffic impact study, which includes trip generation data pertaining to the municipal streets that enter Zone A, namely North Warren Street and Willow Street. North Warren Street is a one-way street in the southbound travel direction south of its intersection with Pennington Avenue. Commission staff notes that North Broad Street is a one-way street in the northbound direction and, as a consequence, would not generate additional traffic entering Zone A. Traffic could also enter Zone A via North Willow Street by means of Tucker Street.

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The trip generation calculations were performed utilizing methodologies consistent with those presented in the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition. The site trips for the proposed MIHIC building were calculated using land use code (LUC) 720, which is defined as “a facility that provides diagnoses and outpatient care on a routine basis but is unable to provide prolonged in-house medical and surgical care.” The table below summarizes the trip generation, which is defined as “single or one-direction vehicle movement with either the origin or destination (exiting or entering) inside a study site” as follows:

LUC	Project building	Weekday AM Peak			Weekday PM Peak		
720 Medical-Dental Office Building	44,861 sf.	In	Out	Total	In	Out	Total
		133	35	168	81	188	269

The submitted study notes, and Commission staff observes, that the number of new vehicle trips falls below the industry-accepted standard of a significant increase in traffic of 100 trips. Based on Transportation Impact Analysis for Site Development, published by the ITE, “it is suggested that a transportation impact study be conducted whenever a proposed development will generate 100 or more added (new) trips during the adjacent roadways’ peak hour or the development’s peak hour.” Additionally, the New Jersey Department of Transportation has determined that the same 100-vehicle threshold is considered a “significant increase in traffic.”

However, with respect to the Commission’s jurisdiction, the trip distribution to the proposed site, based on the existing travel patterns and the location of the site driveways, would determine if the additional traffic resulting from the project would have an adverse impact on the Delaware and Raritan Canal State Park. The study concluded that 3% of the trips generated by the project would travel to and from the site via North Willow Street, and the project would not generate any additional trips on North Warren Street.

Given the foregoing, Commission staff determines that the additional traffic generated by the project would not have an adverse impact on the park, and that short of rearranging the street grid of the City of Trenton, there are no feasible planning techniques that could direct the additional traffic away from the park. Therefore, the project is in compliance with this requirement.

Staff Recommendation: Staff recommends approval.

Sincerely,



John Hutchison
Executive Director

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c. Mercer County Planning Board

City of Trenton Planning Board

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