To: Montgomery Township Development Review Committee

From: Montgomery Township Environmental Commission

Re: BA-03-23 Tamer Kharrubi

Date: January 2, 2024

1. Variances
2. The Environmental Commission has reviewed the application materials. We are shocked by the number of bulk variances requested, all of which are large, though several of them are pre-existing. Has the applicant attempted to purchase land from adjacent property owners to reduce some of the variances, or to sell the land to a neighbor to add to their lot? We are afraid that the house would look as if it was wedged into a tight spot. It is definitely not in keeping with the look of the neighborhood.
3. Though there are other structures near the Georgetown-Franklin Turnpike in this area, the garage sticking out in front so close to the highway is not a good look. Unfortunately, the lot is so narrow that it wouldn’t be possible to put a driveway beside the house and move the garage to the side or rear of the house. Cars, whether the owners’ cars or visitors, will park in the driveway, right next to the road, also not a nice look. The large expanse of pavement is also unattractive, but there is not enough room to screen it.
4. The applicant might be able to reduce ground disturbance and regrading by building into the slope, with the house a little taller in front. This can preserve the natural structure of the soil, resulting in better growth of trees, grass, and gardens. If this requires a height variance, the Environmental Commission would support that.
5. Mitigation
6. Should the Board decide to grant the many variances, mitigation should be required.
7. The property should be deed-restricted against any further lot coverage, unless it is not impervious, such as a patio or pergola with pervious pavement and with rocks to store groundwater underneath, like the driveway. If this restriction isn’t provided, future owners might seek permission on the basis of hardship to build an addition, a swimming pool, a pool house, a large porch, a garden shed, a three-car garage, a mother-in-law apartment, etc.
8. We recommend a smaller house. A traditional Cape Cod house would be much more suitable.
9. Thank you for the proposal to use porous pavement to reduce stormwater. The pavement will need to be washed from time to time, and we suggest the provision of rain barrels to provide water for washing.
10. Visual buffers should be required to mitigate the setback variances. Evergreen plantings should be required along the rear and side property lines. Though there do not appear to be near neighbors to the north or east, that could change. Unfortunately, screening along the highway would impede sight distances and contribute to a hazard for drivers exiting the site.
11. Trees
12. The applicant should plant 14 native shade trees per acre. In addition, native trees and shrubs should be included among the buffer plantings: eastern red cedar, white pine, American holly, bayberry, possibly sweetbay magnolias, and inkberry holly. These native plants will provide habitat for native pollinators and birds, shade, and greenery, and deer will be less likely to visit the property if there is a sense of enclosure.
13. Burning bush and spirea are invasive, and not allowed. They would eventually spread to nearby natural areas and crowd out native plants. We strongly recommend against liriope. It is not native, it is badly over-used, and there are many wonderful native groundcovers. There is even a list of native groundcovers titled “Beyond Liriope.” Scores of liriopes were planted in front of Montgomery’s library, and half of them are already dead. We recommend Packera aurea, known as golden ragwort, an adaptable, spreading, native groundcover. Salvia lyrata, aka lyreleaf sage, is another great native groundcover. Both are evergreen, deer-resistant, and both thrive in moist to dry soil, sun to shade. Both have native flowers for native pollinators. Blue mistflower is another native option, though a little taller. Christmas fern is also popular, though not as successful in full sun. Various native sedges can also be used. All of these groundcovers have survived the drought from the summer of 2022 without watering. A combination of all of these options is another possibility.
14. Energy
15. The house should be designed and built with LEED standards. Energy and water saving appliances and fixtures should be used. We recommend solar panels or a green roof. We also suggest that geothermal HVAC be used, which would save quite a lot of energy and money over the years, and definitely pay for itself. It is easier and less expensive to install the underground parts of this system along with the construction of the house. We also recommend electric stove, dryer, and hot water heater instead of gas to reduce methane and other indoor air pollution.
16. Lighting
17. The Environmental Commission recommends that the proposed lights should be pointed downwards, shielded from the sides, and as low in elevation and intensity as possible, in keeping with Montgomery’s Dark Skies policy. Yellow light bulbs, which are the least disorienting to wildlife, should be used. Please be aware that overly bright lights can cause glare and temporarily blind people, reducing visibility; and any lighting may interfere with nocturnal pollinators, fireflies, bats, and migrating birds. Security lights should be on a motion detector.
18. Low lights would also help mitigate the setback requirements for the neighbors. The lights should be turned off as early as possible in the evening, and the applicant might consider special protocols, such as brief shut-offs during spring and fall migration.
19. There is a Model Lighting Ordinance jointly developed by the Illuminating Engineering Society and the International Dark Sky Association that provides guidance on developing a lighting plan that will meet the applicant’s needs and protect the wildlife that provides us with so vital many ecosystem services, including pollination and pest control. The Environmental Commission requests that your design follow those guidelines. The International Dark Sky Association provides a lot of information on the least harmful yellow lights and on other issues in their website.