

REDEVELOPMENT PLAN
FOR
BLOCK 2801, LOTS 5, 9, 10 AND 11
CITY OF VINELAND, CUMBERLAND COUNTY, NJ
October 25, 2017

Prepared for:

Jerry Velazquez, Executive Director
Cumberland County Improvement Authority
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Prepared by:

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1.0 INTRODUCTION

The Cumberland County Improvement Authority (CCIA) submitted an application to the City of Vineland to have a 24.2- acre parcel of land, located on the southwest corner of the intersection of Park Avenue and N. West Avenue in the City of Vineland, Cumberland County, New Jersey, designated as an "area in need of redevelopment" (the Redevelopment Area/the Subject Properties), in accordance with the New Jersey Local Redevelopment and Housing Law, N.J.S.A.40A:12A-1. The City of Vineland approved Resolution No. 2017 – 211 (Appendix A) on May 9, 2017, adopting the Findings and Conclusions of the Planning Board of Vineland that certain specified properties be declared as an area in need of redevelopment, pursuant to the New Jersey Housing and Redevelopment Laws. The location of the proposed Redevelopment Area is shown on the attached United States Geological Survey's 7.5' Topographical Quadrangle Map for Millville, New Jersey (Figure 1). The parcel is identified as Block 2801, Lots 5, 9, 10 and 11 on the City of Vineland, Cumberland County, New Jersey Tax Map (Figure 2). A copy of the 2015 orthographic aerial photography, depicting the extent of the proposed Redevelopment Area and adjacent properties is provided in Figure 3.

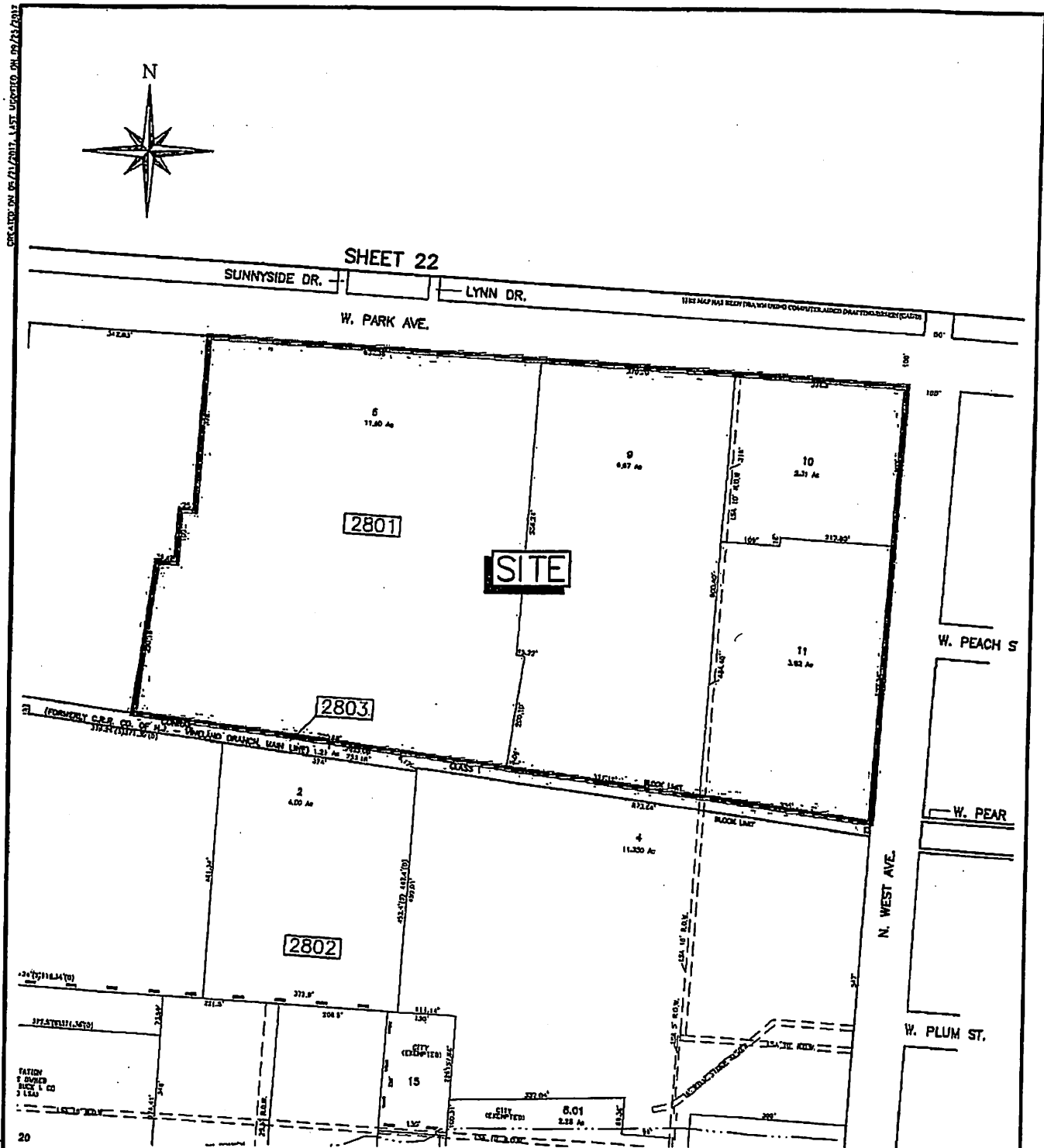
The CCIA purchased the Subject Properties from Vineland Construction Company (VCC) on October 4, 2017 for \$12,000,000 and anticipate having the renovations completed by the end of 2018.

For the Subject Properties to be deemed an "area in need of redevelopment", the Vineland City Council adopted Resolution No. 2017 -135 (Attachment B) on February 28, 2017 directing the Vineland Planning Board to undertake a preliminary investigation to determine whether the Subject Properties met the criteria to qualify as a redevelopment site, pursuant to the New Jersey Local Redevelopment and Housing Law. A Preliminary Investigation Report was prepared by Kathleen Hicks, P.P., A.I.C.P. of the Vineland Planning Division in April of 2017 assessing the condition of the Subject Properties and determining that the site satisfied the criteria to be designated as an area in need of redevelopment. The Preliminary Investigation Report concluded the Subject Properties did meet the criteria of the Local Redevelopment and Housing Law. The Vineland Planning Board approved Resolution No. 6211 (Attachment C) on April 27, 2017 that documented the Subject Properties met this criteria. Vineland City Council adopted Resolution No 2017-211 (Attachment A) on May 9, 2017, accepting the findings and recommendations of Vineland Planning Board Resolution 6211.

As a determination has already been made by the City of Vineland that the Subject Properties satisfies the criteria under Section N.J.S.A.40A:12A - 5 *Determination of need for redevelopment*, this report will supplement Vineland's decision to include the



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SOURCE: OFFICIAL CITY OF VINELAND TAX MAP SHEET 28

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TAX MAP - FIG.2
 PARK AVENUE REDEVELOPMENT AREA
 CITY OF VINELAND, CUMBERLAND COUNTY, NEW JERSEY

DATE: 09/21/2017

SCALE: 1" = 1,000'

DRAWN BY: C. HARRIS

PARSONS BRINCKERHOFF CONSULTANTS INC. - TAP 418P.DWG

sites as an area in need of redevelopment. The report will address the criteria under N.J.S.A.40A:12A – 7 *Adoption of redevelopment plan.*

2.0 EXISTING SITE CONDITIONS

The Redevelopment Area encompasses 24.2 acres (1,054,152 square feet) of land, identified as Block 2801, Lots 5, 9, 10 and 11 and located on the southwest corner of the intersection of Park Avenue and North West Avenue in the City of Vineland, Cumberland County, New Jersey. The land use of the proposed Redevelopment Area is of a professional office - industrial nature. There are four building structures within the site. There is a 214,000-square foot warehouse within Lots 5 and 9; a 35,000 - square foot warehouse on Lot 9; a 68,000 - square foot warehouse on Lot 11; and a 30,000 square foot office building on Lot 11. There are no residential units within the Subject Properties. Approximately 90 percent of the site is comprised of existing impervious coverage.

The land use of the properties that are adjacent to the proposed Redevelopment Area is mostly developed as industrial, commercial and office use. There are no residences adjacent to the site. The area to the south and east of the Subject Properties was previously designated as a redevelopment area in 2004 by the City of Vineland. The area to the northwest of the Subject Properties encompasses property that was previously developed by the CCIA for the New Jersey Division of Motor Vehicles.

The site is relatively flat with elevations of approximately 90 feet above mean sea level. Drainage from the site flows in a southwesterly direction towards the municipal stormwater system and ultimately discharges into the Little Robin Branch of the Maurice River.

The proposed Redevelopment Area is situated within Watershed Management Area # 17 and within the Maurice River Watershed. There are no surface water bodies within the site. The site is outside the designated 100-year floodplain as shown on the Federal Emergency Management Agency Flood Insurance Rate Map for Vineland.

There are no wetlands or wetland buffers within or adjacent to the site. There are no threatened or endangered plant or wildlife species within or adjacent to the site.

The site has direct access to utility infrastructure including sewage, water, electric, gas and stormwater. The Redevelopment Area is within a mapped sewer service area of the Cumberland County Water Quality Management Plan.

The Redevelopment Area lies within Vineland's I-2 Industrial Zone. It is the intent of this zone to recognize and preserve the character of established industrial areas within the Vineland. As there is suitable developable land within these zones, it is Vineland's goal



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Block 2801, Lot 5 is a 11.46- acre tract of land located at 17 West Park Avenue. There is a 214,000-square foot warehouse with rail service, located to the rear of the site. A portion of the warehouse extends onto Lot 9. Access into the site is provided by multiple driveways onto West Park Avenue. The entire frontage of the site is truck parking for the warehouse use. The entire tract is comprised of impervious coverage. This warehouse building will remain "as is" and will continue to be used as warehouse facility over the short term but will be marketed for future manufacturing and production to private industry.

Block 2801, Lot 9 is a 6.65- acre tract of land located at 57 West Park West Avenue. There is a 35,000-square foot garage that fronts on Park Avenue. Access into the site is provided off of Park Avenue. There are no designated parking spaces within the site, though the impervious areas surrounding the building appear to be used for parking. The entire tract is comprised of impervious coverage. This building will be renovated and leased to the Vineland City Electric Utility and the Vineland Department of Public Works. The CCIA also plans to develop a central fleet fueling and maintenance facility within this building to service Cumberland County, the City of Vineland and the Landis Sewerage Authority. This state of the art facility will have electric modules that will signal to the fleet service departments of the county and municipality when it is time to service the vehicles. These services will include fueling of vehicles, tune ups, tire rotations, changing of oil as well as other major services that are essential to enhancing the performance of a vehicle and prolonging the life of the vehicles. The renovation of this building is scheduled to be completed by the end of 2018.

Block 2801, Lot 10 is a 2.28-acre tract of land located at 71 West Park Avenue. There is a 30,000-square foot two-story office building, located at the northeast corner of the site adjacent to the intersection of Park and N. West Avenue. There is an extensive lawn area in front of the building. Access into the site is provided by a looped driveway off of Park Avenue. There are 13 parking spaces in front of the office building. A little more than 50 % of the site is impervious coverage. This building will be renovated and leased to the United States Department of the Treasury. The renovation of this building is scheduled to be completed by the end of 2018.

Block 2801, Lot 11 is a 3.74-acre tract of land located at 50 West Park Avenue. There is a 68,000-square foot warehouse with rail service, located at southerly end of the site. Access into the site is provided by multiple driveways onto N. West Avenue. There are 182 parking spaces along the N. West Avenue side of the property. The entire tract is comprised of impervious coverage. This warehouse building will remain "as is" and will continue to be used as a warehouse facility over the short term but will be marketed for future manufacturing and production to private industry.



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5.0 PLAN VISION AND GOALS

The Redevelopment Plan is multifaceted and is expected to satisfy the vision, goals and objectives of the state, county and municipality. From the broader viewpoint, the redevelopment of this site will advance smart growth planning principals including the creation of compact building design, the preservation of open space, farmland and environmentally critically areas and strengthening and directing of development towards existing developed areas.

The Plan will also achieve the following:

- This Redevelopment Plan will take obsolete and substandard professional office and light industrial warehouse space and convert it into a more efficient and desirable use that will attract a portion of its work force from the immediate area. The facade of the repurposed building will be improved thereby enhancing the aesthetics and character of the downtown area of Vineland. This should attract new tenants.
- The Plan will upgrade the onsite stormwater management system and as well as the local road drainage system to reduce the quantity of stormwater runoff discharging from the site. This should reduce flooding of local roadways, properties and downstream surface water bodies. The upgraded stormwater system should also improve the quality of stormwater discharging from the site.
- The redevelopment of the site will improve the circulation of truck traffic entering into the Subject Properties thereby alleviating traffic jams on local road and reducing safety hazards. The improved flow of traffic will also reduce the concentration of air pollution being emitted into the air.
- The Plan will reduce the operational costs of Cumberland County, Vineland and the Landis Sewerage Authority by centralizing the fleet fueling and maintenance services and improving the efficiencies of servicing these vehicles. The maintenance plan will also extend the life of the service vehicles being used by the county and municipality. The reduced capital costs will reduce the tax burden on the residents of Vineland and Cumberland County.
- This Redevelopment Plan will focus development in areas where infrastructure already exists, thereby minimizing the public subsidy necessary to support these activities and reducing the cost to businesses to build facilities, transport goods, connect with suppliers, customers and partners, and access employees.



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This Redevelopment Plan will focus development in areas where infrastructure already exists, thereby minimizing the public subsidy necessary to support these activities and reducing the cost to businesses to build facilities, transport goods, connect with suppliers, customers and partners, and access employees.

The Redevelopment Plan will improve traffic circulation in the area. When the original facility operated as a truck terminal and light industrial warehouse, the truck traffic would stack onto local roadways as it awaited entrance into the facility. This created traffic problems and a safety hazards for the local resident population. The idling of truck traffic also generated air pollution that was detrimental to the health and well-being of the nearby community as well as pedestrians in the area. The Redevelopment Plan will improve traffic circulation and reduce air pollution by reconfiguring the entrance into the facility in a more efficient manner that is done in accordance with acceptable transportation engineering standards.

The Redevelopment Plan will improve the drainage problems that are experienced in the immediate area surrounding the Subject Properties. The Subject Properties do not have a stormwater management system, that can effectively manages stormwater that is generated from the impervious coverage within the site. With existing impervious site coverage exceeding approximately 90 percent, the stormwater that is generated from the site places a considerable demand on the adjacent municipal stormwater collection system and causes flooding of adjacent properties and roads. This flooding is a hazard to local traffic and property.

The quality of the stormwater runoff that is generated from the site is also degraded and poses an adverse impact to the water quality of downgradient surface water bodies. Petroleum hydrocarbons, suspended solids and other contaminants collect on the surface of the parking facility and these contaminants are easily transported offsite by stormwater runoff. The proposed upgrades to the stormwater management system should improve water quality.

The efficiencies from the central fleet monitoring and maintenance will result in substantial savings to Cumberland County and Vineland by consolidating the services that typically would be performed by each individual entity into one. The ongoing monitoring and repairing of service vehicles will substantially increase the life of these vehicles, thereby reducing the need to replace the vehicles. This will reduce capital costs of Cumberland County, Vineland and the Landis Sewerage Authority and will reduce the tax burden to the residents of Cumberland County and Vineland. Property taxes that will be paid by the private entities that develop within the Redevelopment Area will also lessen the financial burden of the taxpayers of Vineland.



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offset for first four years; credit against the corporation Business Tax Act Liability of \$1500 per employee; priority in state financing programs; job skill training; and six-year municipal real estate tax abatement program.

The Subject Properties are located in a PA -1 Metropolitan Planning Area under the State Development and Redevelopment Plan and therefore considered an area targeted for growth and redevelopment. The Subject Properties have direct access to infrastructure including roads, sewage, water, electric and gas. The redevelopment of this site will advance smart growth planning principals including the creation of compact building design; the preservation of open space, farmland and environmentally critically areas and strengthening and directing of development towards existing developed areas.

- *Inventory of housing units to be removed within the Redevelopment Area.*

As there are no housing units within the proposed Redevelopment Area, the inventory of housing within the City of Vineland will not be reduced.

7. ZONING AND LAND USE STANDARDS

The proposed Redevelopment Area is located within Vineland's I-2 Industrial Zone. It is the intent of this zoning designation to recognize and preserve the character of established industrial areas within Vineland. This Redevelopment Plan will expand the permitted uses within the Subject Properties to allow for corporate and governmental offices. Corporate office use has historically been established within the Subject Properties by VCC though it was never a permitted use with the I-2 zone. The Redevelopment Plan would still maintain the area, yard, bulk and parking standards of the I-2 Zone.

There are no proposed changes to the Land Use Standards for this site.

8. CONSISTENCY WITH THE VINELAND MASTER PLAN AND ZONING ORDINANCE

The proposed Redevelopment Plan will be consistent with the Vineland Master Plan whose stated principles include balanced land use, sustainable development and equitable growth. The Plan will satisfy these principles in the following manner:

- Balance Land Use

The Vineland Master Plan recognizes that land and water are finite resources that are to be valued and protected. Residential, commercial, industrial, agricultural, public, recreational, and open space uses compete for a share of these two limited and increasingly valuable resources. Vineland's future land use and development must be balanced to meet the public needs and serve the goals and objectives of their plan for



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biota within the streams. There will be a positive impact resulting from the management of stormwater within the area once the site is redeveloped

- **Equitable Growth**

The benefits and the responsibilities of the Vineland's growth, development and redevelopment, and conservation should be equitably shared. The Master Plan supports the vitality of their urban and suburban areas that have the appropriate infrastructure, regional highway access, and community facilities to support and serve the City's present and future population and provide for new job creation and housing. The City will utilize its existing urban and suburban footprint more efficiently through the redevelopment and rehabilitation of the City's downtown, by reclaiming brownfields and greyfields for beneficial economic development, through the adaptive reuse of existing developed sites, and by promoting the infill of areas where sewer and water lines already exist.

This Redevelopment Plan will have a positive impact on Vineland's growth, development, redevelopment and conservation. The Plan will redevelop and repurpose outdated and obsolete professional office and industrial structures that have diminished ability to compete with the more up-to-date inventory of the region. The new facilities will enhance the aesthetics of the area by providing an architectural façade that is aesthetically pleasing. The revenues that are generated from the tenants that occupy the renovated space and the sale of portions of the property will lessen the tax burden of the Cumberland County and Vineland residents

Once development is completed, the site characteristic will result in a modern professional office and warehouse design and provide a state of the art professional office campus and central fleet fueling and maintenance facility that will service county and municipal vehicles in a cost - effective manner. These savings will lessen the tax burden of County and Vineland residents

It is the intent of Vineland's I-2 zone to recognize and preserve the character of established industrial areas within the City. As there is available land that can be developed within this zone, the goal is to allow for more industrial areas in the I-2 Zone than the I-1 or I-B Zones, so as to provide varied industrial opportunities. The Redevelopment Plan will propose expanding the permitted uses within the I-2 Zone to include corporate and government office. There are not changes to the area, yard, bulk and parking standards of the I-2 zone.

9. CONSISTENCY WITH STATE AND LOCAL PLANS AND REGULATIONS

- **Local Plans**



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The redevelopment of this site will help to revitalize the downtown area of Vineland, promote growth in compact forms, preserve the rural, undeveloped areas of Vineland, provide for the State's future growth, and help to stabilize the area.

10. AMENDMENTS TO THE PLAN

This Redevelopment Plan may be amended from time to time upon compliance with all applicable laws and statues and upon the approval of the Governing Body. No amendment to this Plan shall be approved without the review and recommendation of the Planning Board and a public hearing and adoption by the City of Vineland Council. A copy of any proposed changes to the Redevelopment Plan shall be filed with the City of Vineland Clerk's office.

11. REFERENCES

- City of Vineland, Tax Map, Sheet 28
- Master Plan, prepared by T & M Associates, dated April 2008
- City of Vineland Zoning Map
- City Council of Vineland Resolution No. 2017 -135, dated February 28, 2017
- Vineland Planning Board Resolution No. 6211, dated April 27, 2017
- City Council of Vineland Resolution No 2017-211
- City Council of Vineland Resolution No. 2017 -135
- City of Vineland, Cumberland County, Center City Redevelopment Plan, prepared by Heyer, Gruel and Associates, dated May 2004
- New Jersey 2015 High Resolution Orthophotography, NAD83(2011) NJ State Plane Feet, MrSID Tiles, prepared by NJ Office of Information Technology (NJOIT), Office of Geographic Information Systems (OGIS), published 02/24/2016
- New Jersey Local Redevelopment and Housing Law, N.J.S.A. 40A:12A-1
- New Jersey State Development and Redevelopment Plan, prepared by the New Jersey Planning Commission
- Vineland Construction Redevelopment Study, Block 2801, Lots 5,9,10 and 11, City of Vineland, Cumberland County, New Jersey, prepared by Kathleen Hicks, Vineland Planning Division, City of Vineland, dated April 2017
- United States Geological Survey's 7.5' topographic quadrangle map for Millville, New Jersey



CITY OF VINELAND

RESOLUTION NO. 2017- 211

RESOLUTION ADOPTING THE FINDINGS AND RECOMMENDATIONS OF RESOLUTION 6211 OF THE PLANNING BOARD OF THE CITY OF VINELAND THAT CERTAIN SPECIFIED PROPERTIES BE DECLARED AS AN AREA IN NEED OF REDEVELOPMENT PURSUANT TO THE NEW JERSEY HOUSING AND REDEVELOPMENT LAWS

WHEREAS, pursuant to N.J.S.A. 40A:12A-6(a), the City Council of the City of Vineland (Council) directed the Planning Board of the City of Vineland (Planning Board) to undertake a preliminary investigation to determine whether Block 2801 Lots 5, 9, 10 and 11 (Study Area) should be designated as a Condemnation Redevelopment Area in accordance with N.J.S.A. 40A:12A-1, et seq.; and

WHEREAS, Kathleen Hicks, Supervising, Planner of the City of Vineland prepared a report entitled "Vineland Construction Redevelopment Study" (Study) dated April 2017 and a map of the area to be investigated and a preliminary investigation of the proposed areas to be designated as redevelopment areas was presented; and

WHEREAS, the Planning Board conducted public hearings on April 27, 2017 at which time all interested individuals and property owners were provided the opportunity to address all their questions and concerns, and considered the sworn testimony of Kathleen Hicks; and

WHEREAS after careful study and deliberation of the statements and testimony made during the public hearing and the evidence presented during the course of the public hearing, the Planning Board recommended to City Council that Block 2801, Lots 5, 9, 10 and 11 meet at least one of the criteria as set forth in N.J.S.A. 40A:12 A-5 and therefore are determined to be Lots in need of redevelopment.

NOW, THEREFORE, BE IT RESOLVED by the Council of the City of Vineland that it hereby adopts and approves the findings and recommendations made by the Planning Board as memorialized in Planning Board Resolution Number 6211, Resolution of Findings and Conclusions and Decision of the Vineland Planning Board, and hereby declares Block, 2801, Lots 5, 9, 10 and 11 is a Condemnation Redevelopment Area in accordance with N.J.S.A. 40A:12A-1 et seq. Specifically, Lots 5, 9, 10 and 11 meet the criteria of (1) subsection a of N.J.S.A. 40A:12A-5, the generality of the buildings are substandard or obsolescent for reasons set forth in the Study; (2) subsection d of N.J.S.A. 40A:12A-5, the Lots have buildings or improvements which by reason of obsolescence, faulty arrangements or design, and excessive land coverage are detrimental to the safety and welfare of the community and should the property ever return to full utilization in its current condition, the configuration of the fencing and gate would be detrimental to the safety of the community because of the resulting truck stacking on Park Avenue. Further, the drainage system is absolutely obsolete and faulty design in that there is a 24.2 acre site with no on site retention of detention drainage facilities causing a significant impact on the city drainage system and contributes to the periodic flooding of West Avenue; (3) subsection g of N.J.S.A. 40A:12A-5, the entire Study Area is located within the Vineland - Millville Urban Enterprise Zone; (4) subsection h of N.J.S.A. 40A:12A-5, the property is located in a PA-1

Appendix B

Vineland City Council, Resolution No. 2017 -135



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Appendix C

**Vineland Planning Board, Resolution No. 6211, April
27, 2017**



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The Planning Board incorporates by reference into this Resolution the Redevelopment Study and Preliminary Investigation Report dated April 2017 as prepared by Kathleen Hicks, PP.

The Planning Board further finds that all procedural aspects of the Planning Board's public hearing have been satisfied, specifically notice requirement. The Planning Board finds that the public was notified in accordance with N.J.S.A. 40A:12A-6.

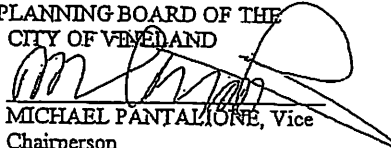
The foregoing is a true copy of the Resolution of decision adopted by the Planning Board of the City of Vineland at a meeting held on April 27, 2017, as reflected in the recorded minutes of said meeting.

ADOPTED DATE: 4-27-17

Attest:


YASMIN RICKETTS, Secretary

PLANNING BOARD OF THE
CITY OF VINELAND


MICHAEL PANTALONE, Vice
Chairperson

ROLL CALL VOTE

VOTING IN FAVOR

ABSTAINING

ABSENT

OPPOSED

**VINELAND CONSTRUCTION
REDEVELOPMENT STUDY
BLOCK 2801/LOTS 5, 9, 10, & 11**

CITY OF VINELAND
CUMBERLAND COUNTY, NEW JERSEY

APRIL 2017

Prepared by:
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License No.: LI-3067
Vineland Planning Division

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INTRODUCTION

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AREA IN NEED OF REDEVELOPMENT ANALYSIS

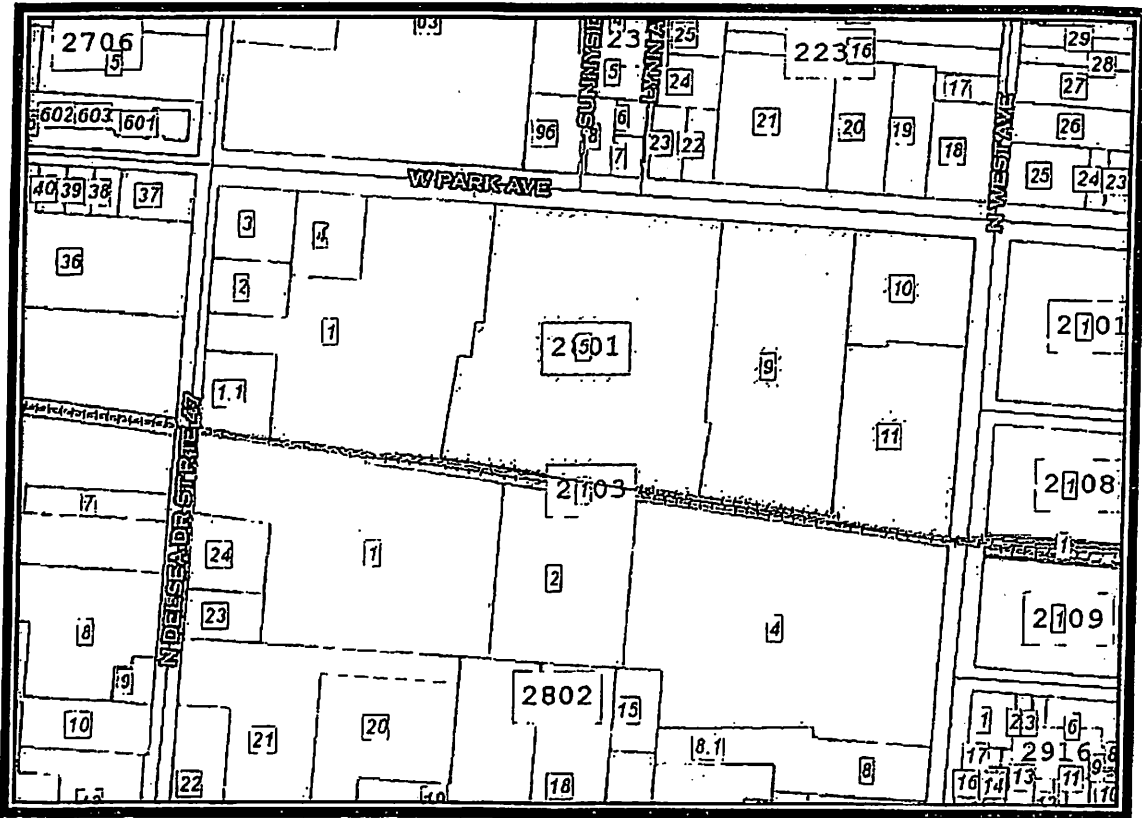
Criteria for Area in Need of Redevelopment
Findings

FIGURES

1 – Site Study Area Map (Block 2801/Lots 5, 9, 10 & 11)
2 – Tax Map
3 – Aerial Photograph

APPENDICES

A – City Council Resolution No. 2017-135



**VINELAND CONSTRUCTION
REDEVELOPMENT STUDY AREA**
April 2017

BASIS FOR THE INVESTIGATION

The City of Vineland City Council instructed the Planning Board to undertake a preliminary investigation as to whether Block 2801/Lots 5, 9, 10 and 11 can be designated an area in need of redevelopment, which would give City Council full authority to use all those powers provided by the Legislature for use in a redevelopment area, including the power of eminent domain, further referred to as a Condemnation Redevelopment Area. The property was once a large scale trucking/warehousing facility. Since the departure of National Freight, the property is only used minimally for short term warehousing. Being a large tract, located near the intersection of 2 important arterial roadways, close to Center City, the property has failed to develop under normal market conditions even though it has actively been marketed for over 5 years.

FIGURE 1 – Site Study Area Map (Block 2801/Lots 5, 9, 10 & 11)

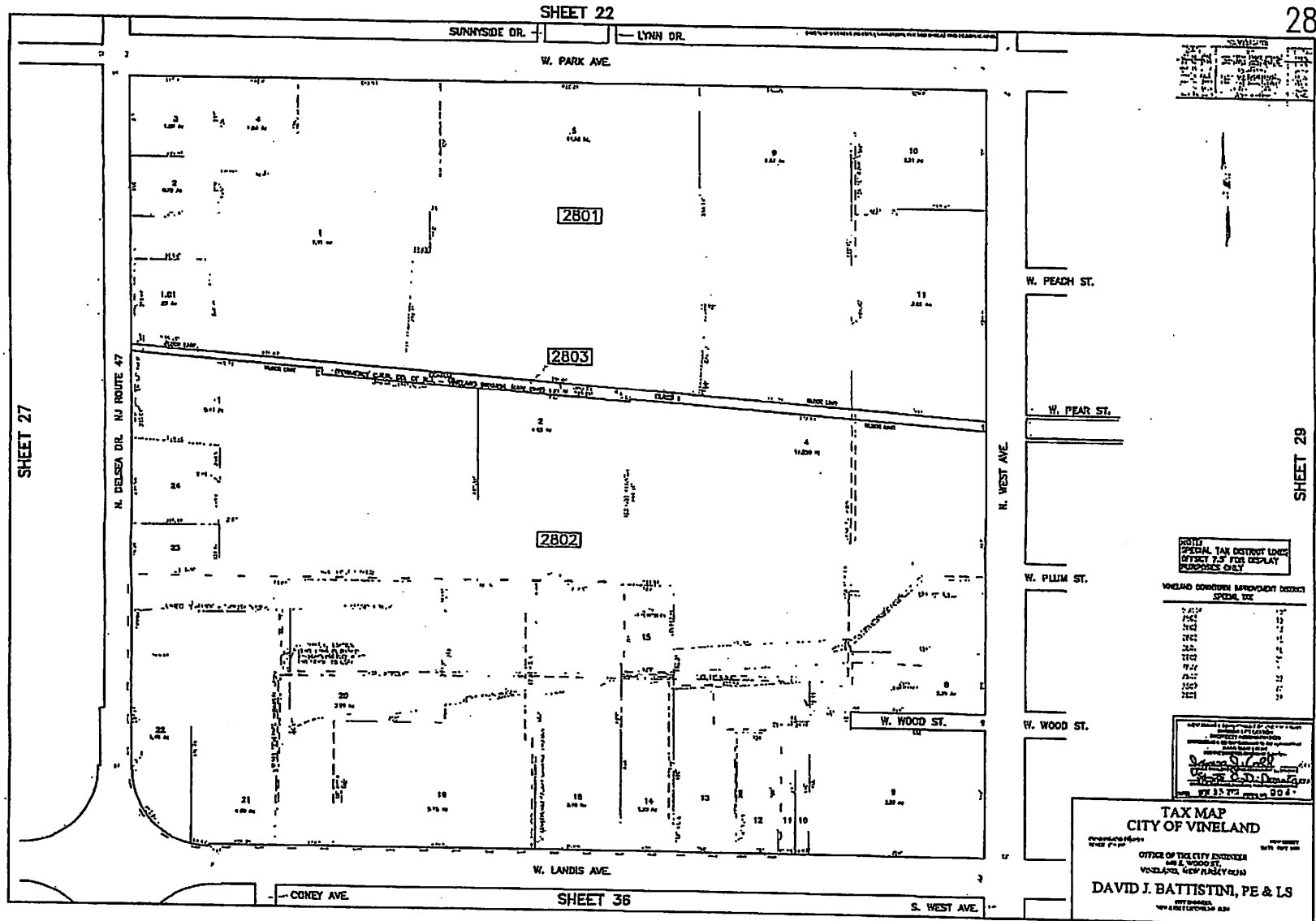


FIGURE 2 – Tax Map

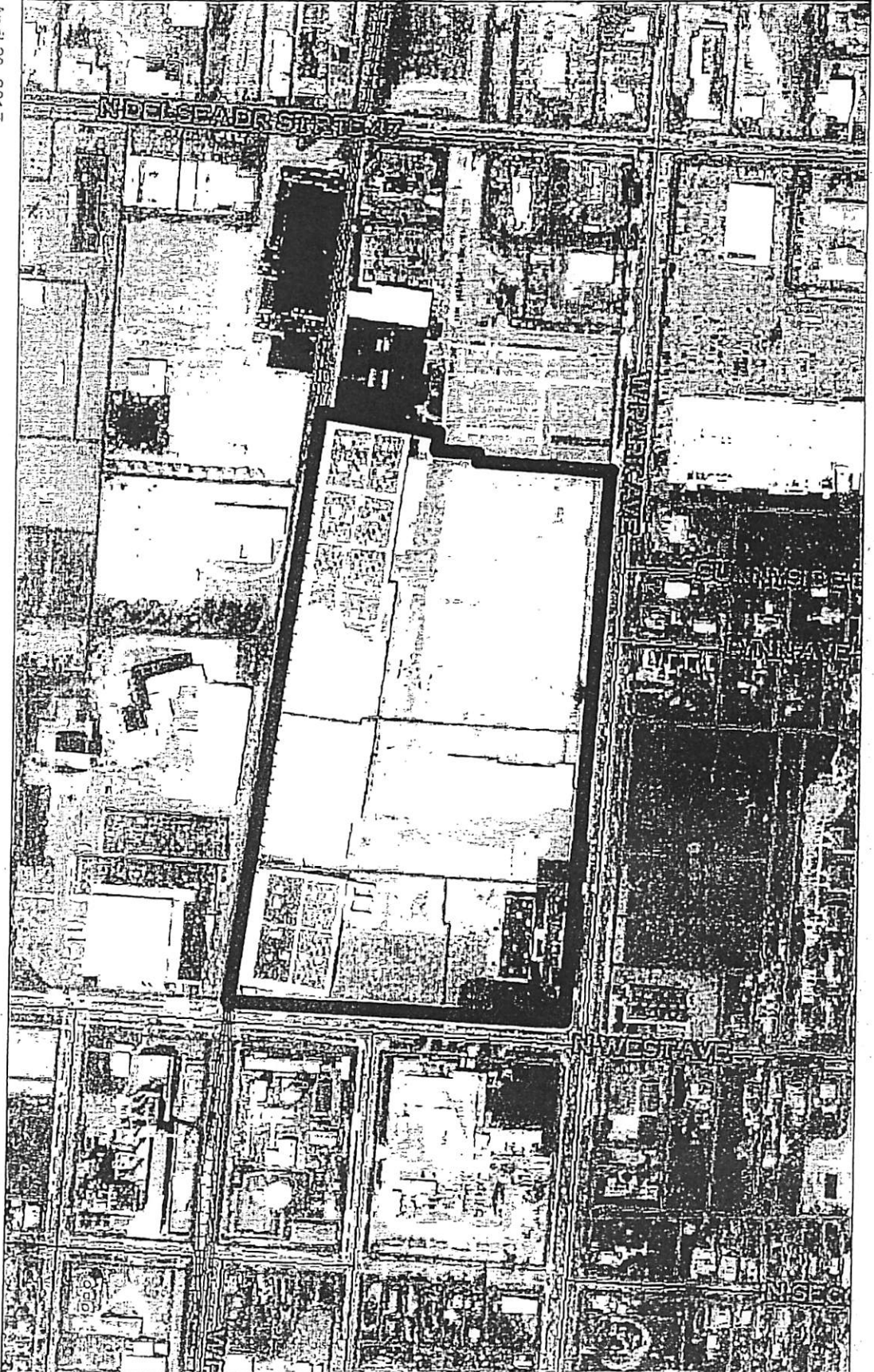
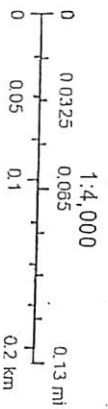
April 20, 2017

Street Names (Label)  Railroad

Parcel Outline  Streets

Streams (DEP) 

FIGURE 3 – Aerial Photograph



- storm, fire, cyclone, tornado, earthquake or other casualty in such a way that the aggregate assessed value of the area has been materially depreciated.
- g. In any municipality in which an enterprise zone has been designated pursuant to the "New Jersey Urban Enterprise Zones Act," P.L.1983, c.303 (C.52:27H-60 et seq.) the execution of the actions prescribed in that act for the adoption by the municipality and approval by the New Jersey Urban Enterprise Zone Authority of the zone development plan for the area of the enterprise zone shall be considered sufficient for the determination that the area is in need of redevelopment pursuant sections 5 and 6 of P.L.1992, c.79 (C.40A:12A-5 and 40A:12A-6) for the purpose of granting tax exemptions within the enterprise zone district pursuant to the provisions of P.L.1991, c.431 (C.40A:21-1 et seq.). The municipality shall not utilize any other redevelopment powers within the urban enterprise zone unless the municipal governing body and planning board have also taken the actions and fulfilled the requirements prescribed in P.L.1992, c.79 (C.40A:12A-1 et al.) for determining that the area is in need of redevelopment or an area in need of rehabilitation and the municipal governing body has adopted a redevelopment plan ordinance including the area of the enterprise zone.
 - h. The designation of the delineated area is consistent with smart growth planning principles adopted pursuant to law or regulation.

Findings

Criteria 'a'

This property satisfies criteria 'a'. The generality of buildings are substandard or obsolescent. The two (2) warehouse buildings are obsolete. The lack of cross docking for trucks and the low ceiling heights and building depth make them undesirable for today's large scale warehousing operations. The office building and garage are both substandard. The office building hasn't been renovated since it was constructed. While two (2) story, there have been no accessibility improvements. The garage also has limited utility because of the removal of all the lifts.

Criteria 'd'

This property satisfies criteria 'd'. It has areas with buildings or improvements which by reason of obsolescence, faulty arrangement or design, and excessive land coverage are detrimental to the safety and welfare of the community.

As mentioned earlier, this property, while four (4) lots, was developed as a complex, with shared access, parking and utilities. Any attempt to partition the property would be very difficult because of this integration, particularly the rooftop solar systems on the warehouses. Allowing the property to remain 'as is', with minimal utilization, is detrimental to the welfare of the community.



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