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February 28, 2021

Town of Clinton  
P.O. Box 5194  
Clinton, New Jersey 08809

Attention: Allison Witt (via e-mail- awitt@clintonnj.gov)

Reference: Puleo International, LLC - Block 18 Lot 5  
Preliminary/Final Major Site Plan/Use Variance – Technical Review #1  
Town of Clinton, Hunterdon County, New Jersey

Dear Allison:

The application filed by Puleo International, LLC is for a proposed warehouse & showroom facility on this mostly vacant property located at the corner of 13 Moebus Pl. / Route 31 and adjacent to the Municipal Boundary line with Clinton Township. The initial submission was outlined in my Completeness Report #1 dated December 8, 2020 and considered by the Board at their meeting on December 15, 2020 at which time the Board granted several Permanent Waivers and Temporary Waivers and noting several other missing items resulting with the Board deeming the application to be incomplete. A second submission was made on January 27, 2021 and outlined in my Completeness Report #2 dated February 8, 2020 in which I listed the action taken in December and noted that critical Engineering items Q, S, Y, 1, 25 & 27a had been addressed and that of a few of the remaining minor/administrative items could be waived by the Board and allow the applicant allowed to proceed with a presentation of their project at a public hearing schedule for March 2, 2021. Accordingly, the first action the Board should consider taking at the upcoming hearing on March 2<sup>nd</sup> would relate to granting temporary waivers of the remaining Checklist items:

- **Item H- Grant a temporary waiver from refiling Water & Sewer applications with the Town Water & Sewer Departments.** The prior approvals granted to Fallon for the construction of two (2) 50,000 sf Office Building included relatively large allocations of Water and Sewer capacity for that project while the current proposal would require substantially less. Given the above circumstances the granting of a temporary waiver would require the refiling of the prepared application as part of the hearing process or (at the Board's discretion) as a condition granting approval.
- **Item 18 – Grant a temporary waiver from providing ownership documentation relative to the existing off-site storm drain line.** The applicant advises that they have completed extensive title research on this issue and to date have not yet found documentation on what would presumably be ownership of the existing of the pipe by Clinton Township. The temporary waiver would be to allow them to present that research as part of our review of this application and allow the Board to determine if additional investigation is warranted.
- **Item 20 & 22- providing profile documentation** on the off-site storm drain line. This a minor administrative item that the Project Engineer can subsequently provide to our office.

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VanCleeEngineering.com

Please Reply To:

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If the Board takes the above noted action at the March 2<sup>nd</sup>, meeting then the application could be deemed complete and the applicant allowed to proceed with their Public Hearing:

The documentation of record now consists of the following:

- A. **Applications seeking Preliminary / Final Major Site Plan and Variance** approvals along with supplemental documentation consisting of the following:
1. **Preliminary Site Plan Application** No. 20-07, dated 11/12/2020
    - a) Exhibit A – Number of Employees per Shift;
    - b) Exhibit B – Waivers from Land Development Application Checklist Requirements;
    - c) Exhibit C – List of Maps and Other Documents Accompanying Application;
    - d) Escrow Agreement;
  2. **Final Site Plan Application** No. 20-17, dated 11/12/20
    - a) Escrow Agreement;
  3. **Variance Application** No. 20-07
    - a) Exhibit A – Description of Application and Relief Requested;
    - b) Exhibit B – Resolutions of Prior Development Approvals;
    - c) Escrow Agreements;
  4. **Development Review Checklist** for the Town of Clinton
- B. **Property and Administrative Documentation including :**
1. **Certificate of Ownership of Applicant**, dated 11/10/20;
  2. **Proof of Payment of Taxes** for the remainder of 2020 in the form of an E-mail response from the Town Tax Collector on June 15, 2020 to a request filed by the applicant's Attorney Kara A. Kaczynski Esq. from MYKL, LLC; **(Note- updated certification showing 1<sup>st</sup> Quarter 2021 payment should be provided.)**
  3. **Clinton Town Certified 200' Property Owners List** prepared by Cecilia Covino, Town of Clinton Clerk, dated August 3, 2020 along with Companion list for Clinton Township prepared by Jeffrey Ward Tax Assessor dated August 3, 2020,
- C. **Copies of Applications with outside Agencies including :**
1. **Hunterdon County Planning Board Application- with proof of filing on December 7, 2020.**
  2. **HCSCD – Application for Soil Erosion and Sediment Control Plan Certification** dated November 6, 2020 **with proof of filing on December 7, 2020**
- D. **Utility Agreements and Will Serve Letters** for the following:
1. Sewer Agreement between Town of Clinton and Z&F LLC, dated September 26, 2006 along with a **copy of Application to Town Sewer Dept.** Although the **Document is not Signed/Dated or filed it would be covered under the Temporary Wavier granted for checklist item "H".**
  2. Water Agreement between Town of Clinton and Z&F LLC, dated September 11, 2006; **Copy of Application to Town Sewer Dept.**( Although the **Document is not Signed/Dated or filed it would be covered under the Temporary Wavier granted for checklist item "H".**

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3. Letter dated July 30, 2020 submitted by Project Engineer to Comcast – requesting Will Serve Letter (WSL) for the project; (Pending response from utility company).
  4. Letter dated July 30, 2020 submitted by Project Engineer to E-Town Gas – requesting WSL for the project; (Pending response from utility company).
  5. Letter dated July 30, 2020 submitted by Project Engineer to JCP&L – requesting WSL for the project; (Pending response from utility company).
  6. Letter dated July 30, 2020 submitted by Project Engineer to Republic Services – requesting WSL for the project; (Pending response from utility company).
  7. Certified Mail Receipts for letter referencing items 3-6;
- E. **Preliminary and Final Major Site Plan** prepared by E&LP (Wayne J. Ingram, P.E.), consisting of **Twenty-one (21) sheets**, dated October 19, 2020 and **Revised January 5, 2021** Sheet #3 contains the Boundary and Topographic Survey of the PQ signed & sealed by Wayne J. Ingram, PLS. (**Note: sheet #4 added as Demolition Plan and Sheet #7 added as Detailed Grading Plan**)
- F. **Architectural Plans** entitled “**Floor Plan, Exterior Elevations & Cross Section**” prepared by DeBarbieri Architects, LLC (James E. DeBarbieri, AIA), consisting of one (1) sheet, dated October 21, 2020 **and Revised January 4, 2021.**
- G. **Title Commitment and Easement Agreements:**
1. **Title Commitment documents** prepared by First American Title May 15, 2020 including Schedule B identifying/Listing Exceptions
  2. **Agreement for Well Site, Water Line and Temporary Construction Easement**, dated April 8, 2008
- H. **Stormwater Documentation including:**
1. **Stormwater Management Report dated October 19, 2020 Revised January 5, 2021 prepared by E&LP (Wayne J. Ingram, P.E.) (Note: SWMR- now includes provisions for Groundwater Recharge through use of Bio-retention basin)**
  2. **Stormwater Management Maintenance Manual** dated October 20, 2020, last revised January 5, 2021, prepared by E&LP (Wayne J. Ingram, P.E.);
  3. **Existing & Proposed Drainage Area Maps prepared by E&LP dated 9/25/20.**
- I. **Environmental Impact Statement** prepared by E&LP (Wayne J. Ingram, P.E.) dated October 19, 2020;
- J. **Wetland Absence Assessment** Letter dated December 14, 2020 prepared by E&LP (Matthew Popin Project Scientist.)
- K. **Soil Logs and Soil Permeability Test data prepared by E &LP (Wayne Ingram PE) dated December 22.**
- L. **Geologic Studies** completed for the Fallone Project in 1998 including:
1. **Preliminary Geologic Evaluation of The Fallone Organization Site** prepared by M<sup>2</sup> Associates, Inc. (Matthew J. Mulhall, P.G.) dated May 5, 1998; (**Note: these documents were prepared in 1998 prior to the Town adopting its Carbonate Area District Regulations (section 88-64.2)**)
  2. **Phase II Investigation of Carbonate Rock -Block 18, Lot 5** prepare by M<sup>2</sup> Associates, Inc. (Matthew J. Mulhall, P.G.) dated November 26, 2001. (**Note: this document is stamped “Draft” and is not signed**)

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3. **Carbonate Area District Phase I Investigation prepared by E&LP (Wayne J. Ingram, P.E.) dated December 14, 2020 has been provided along with Phase 1 Checklist have been provided**
- M. **Memo Dated December 14, 2020 from Jack Daniels – Fire Official**
- N. **Letter dated January 20, 2021 from HCPB- granting “Conditional Approval Not To Construct”.**
- O. **Review from HCPB- Letter dated January 20, 2021**

My comments on this application are as follows:

1. **Site Layout & Land Use Issues** – I defer any detailed description regarding the Proposed Building and Site improvements along with detailed performance standards from the Town’s Zoning & Land Use requirements to Jim Kyle’s report. Rather than duplicate the assessment I recommend that the Board reference his report for those aspects of the application. In that regard I am only offering the following supplemental comments under this section to supplement and in some cases expand upon those issues:
  - A. **Building** – The proposed 100,000 sf building is 200 ft. wide and 500 ft. long and contains two elements serving separate functions for this business. The site slopes from the high side along the Route 31 frontage to the low side along the rear property line adjacent to the border with Clinton Township. The building is constructed into the slope and contains the following:
    1. **A 100,000 sf Warehouse** on the lower level with the rear (north) wall containing the 15 loading docks and one drive in truck bay at grade. The ware house has a 49 ft. ceiling height with the west/east side and southerly front wall set below grade.
      - a) The plans need to reflect the location of any intended bathroom or breakroom facilities that would accommodate workers using area.
    2. **A 4,755 sf Office** area on a second level that is confined to the southwest corner of the structure. This section is set at the upper level grade at the front of the site and is accessible from the front parking lot. The Architecture Plans (ref: F) identify several doors along the front wall which would be ingress/egress access into the warehouse and one set identified as Fire Department access to the roof. Space.
      - a) The Site Plan needs to be revised to identify these points of pedestrian access and document ADA compliance if any of them serve that purpose for access to the lower level need to incorporate into the Site Plan.
      - b) Testimony needs to be provided by the Architect on any requirement for providing HC Access to the lower level warehouse space from the HC parking spaces in front of the office area
    3. **A 5000 sf Showroom** set at a 3<sup>rd</sup> level above and accessible from the office area.
    4. **Future Expansion** – although not documented on any of the submitted plans the SMR (ref: H-1) states that the onsite SWM system is being designed to accommodate a future 20,000 sf expansion of the building. Testimony must be provided to stipulate:

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- a) **If the applicant wants a future expansion to be considered as a Phase 2 element** of the project with the related implications on SWM, Zoning and Parking **then that needs to be incorporated into the plan and be presented as part of this application.**
- b) **If the applicant does not want to include a Phase 2 element as part of this application** then there is no justification to design the SWM components of the project to accommodate that expansion since
  1. Any subsequent expansion would be subject to a different set of SWM criteria as reflected later in this report which would require installation of a separate SWM Basin.
  2. Any reduction in size of the currently proposed basin would allow the applicant to provide additional separation between the northerly embankment wall and the adjoining Municipal Boundary with Clinton Twp which in turn would allow for the preservation of the existing trees as recommended by Jim Kyle in his report (ref: N).

**B. Site Circulation/Parking** – Access to the site from an existing ingress/egress driveway opening on Rt 31. This access point was constructed years ago to serve the previously approved Office Building that was never constructed. A second point of access is off of Moebus Place on the west side of the property. **Provide testimony & plan revisions to address** the following:

1. **NJDOT Permit** - Provide Documentation of any limitations or restrictions on the original Highway Access permit that may affect the current proposal
2. **Truck ingress/egress access** to the rear loading docks must be restricted to Rt 31 utilizing the easterly access drive. **Testimony should be provided** regarding possible signage and layout modifications that would:
  - a) Prevent trucks from using the westerly side and southerly front access aisles as a means of access back to Rt 31.
  - b) Prevent trucks from using Moebus Place as a means of ingress/ingress to the site from the proposed driveway on the west side of the property. **Note that Moebus Place has a 6 ton weight limit.**
  - c) Justify if the 120 ft. depth of pavement devoted to the truck access to the load dock is adequate or excessive. For reasons noted later in this report, the elimination of pavement over the existing the existing Town of Clinton Water line easement would protect the Town Water Line and benefit the project.
3. **Parking layout**
  - a) A total of 150 spaces are required per Town Code to accommodate the uses outlined in B1- B3. The applicant is proposing to construct 54 spaces and has designated an additional 96 spaces as “Banked Parking”. **Testimony, must be provided to justify the current proposal** based upon the number of employees and anticipated visitors to the warehouse. For reasons noted later in this report the applicant may want to request and the Board consider granting some permanent relief from this standard if the elimination of some parking along the front of the



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site would allow for a realignment of the proposed building and eliminate the current encroachment of the loading area over the existing waterline easement.

b) **If the applicant is considering a subsequent 20,000 sf addition to the building then that must be incorporated into the plan along with the required parking.**

4. **Pedestrian Access** - A sidewalk is provided along the front of the building for access from the parking space to the various doors along the front of the building. Testimony must be provided and/or plans revised to

- a) Document if there are other access doors into the building requiring sidewalk access
- b) Document the condition and disposition of the existing sidewalk along Moebus Place. The existing sidewalk runs along the applicant’s frontage on Moebus Place starting at Rt 31 and extending to the Town Boarder with Clinton Twp. It also continues along Moebus Place in Clinton Township ending at River Bend Road. As noted below segments of the existing sidewalk is in need of repair/replacement.



c) Determine if there is a need to construct a sidewalk connection from the existing sidewalk on Moebus to the proposed sidewalk at the front of the building. Ultimately this is a decision that the Board would have to make as part of their consideration of the proposal

**C. Zoning** –In his report Jim Kyle outlines all of the required variance relief being requested including the Use Variance for the Warehouse operation. The variance relive associated with the site layout includes the following;

- 1. **Building Height**- the zone allows for a 40 ft. building height whereas the applicant is proposing a 42 ft. height on this structure. Under the Town Code Building Height is the difference between the average ground elevation around the building and the elevation of the roof. In the event that the applicant wants the Board to consider a 20,000 sf (Phase 2) expansion of the structure then that would need to be reflected on the plan and a new calculation of building height provided.
- 2. **Maximum FAR** – the zone allows for a maximum 15% FAR which would limit a building on this property to 86,028 sf floor area. As noted the current building will have total floor area of 109755 sf or 19.13%. In the event that the applicant wants the

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Board to consider a 20,000 sf (Phase 2) expansion of the structure then that must be reflected on the plan along with the FAR expanded to 22.6% requiring additional variance relief from the 15% limitation in this zone.

3. **Maximum Impervious Coverage**-while the current layout has a 42% MIC which is below the 50% allowed in this zone. In the event that the applicant wants the Board to consider a 20,000 sf (Phase 2) expansion of the structure then that would need to be reflected on the plan and a new MIC calculation provided to include the new building and related parking surfaces.
4. **Street Trees**- - the applicant is seeking a waiver from 88-42C (8) which would require the planting of Street trees along Moebus Place and perhaps along Rt 31. I defer to Jim Kyle for his recommendation relating to the requested waiver.
5. **Buffer Landscaping**- a 75 ft. landscape buffer is required along Rt 31 and along the northerly rear border with Clinton Township. In conjunction with comments raise by Jim Kyle I note the following
  - a) **RT 31 Buffer** – with the exception of the easterly driveway access the 75 ft. wide strip along Rt 31 will be left undisturbed. The grade along the front edge of the building is 10 ft. below the grade of the adjoining highway. The plan should note that the 75 ft. strip is being left undisturbed and that it is currently devoid of any successional evergreen growth as generally depicted below



If the intent of the Front Buffer is to screen the building from RT 31 then consideration should be given to constructing a berm and installing buffer plantings along the highway face of the berm.

- b) **Rear Buffer** – The existing 75 ft. wide strip running along the adjoining residential properties in Clinton Township currently contains relatively large mature deciduous trees along the property line and some successional evergreen growth as general depicted below. The plan notes that most of the mature trees along with all of the successional growth will be removed in order to construction the SWM Bio-retention Basin.

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The current proposal is to construct SWM Basin berm adjacent to the residential property line and replant the area with new evergreen trees. **This is unacceptable since the proposed berm (as an impoundment for the SWM Basin) will be classified as an Earthen Dam where tree planting is prohibited.** If the intent of the required 75 ft. landscape buffer is to preserve existing vegetation and provide supplemental planting in order to create a dense visual screen then the layout of the SWM Basin along with the planting of this area must be re-evaluated and the plan revised to achieve those goals. It should be noted that existing ground elevation along the residential property line ranges from 8 ft. to 22 ft. lower than the proposed grade of the pavement along rear loading area and 62 ft. to 76 ft., below the roof of the warehouse.

## 2. Site Grading & Carbonic Rock -

- A. Earthwork** –Given the existing topographic relief from the higher elevations along Rt 31 to the lower elevations along the residential properties in Clinton Township the development of this site will necessitate significant regrading. Issues that need to be considered are noted as follows:
1. The applicant must provide a Cut/Fill Balance Calculation along with a detailed outline of (and impact associated with) the method of excavation including whether blasting will be required.
  2. There will be significant cuts of up to 25' in the south east corner of the building along with significant filling up to 15' along the rear of the loading area. The above noted Cut/Fill calculation must indicate the anticipated extent of excavated material that will be usable for onsite fills and the resulting extent of importation of fill material and the export/disposal of unsuitable excavated material.
  3. As currently designed the SWM- Bio-Retention Basin will require installation of Earth Berms that will be classified as Dams. The submission must include details of the Berms and confirmation as to the Classification under NJDEP standards. Depending upon the classification the final design will most likely require registration with NJDEP and may require approval by DEP.



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4. As noted under IA-4b and 1C-5b the SWM Basin may require substantial redesign and regrading. I will withhold further comment on the issues associated with the Basin embankment until that information has been provided.

**B. Soil Erosion and Sediment Control-** as noted the applicant has filed their SESC plan (ref: C-2) plan with the HCSCD back in November. I have not received any response from the District so the applicant should follow up with them and so that the Board can take their comments into consideration in evaluating this project. Issues that I have note are:

1. The access haul road into and out of the site should be limited to the existing entrance on Rt 31. The current plan to utilize Moebus Place should be prohibited given the issues outlined in 1B-2b above.
2. Given the extent of excavation and filling the applicant should demonstrate that they have designated sufficient areas for temporary stock piling of soil material.
3. The location an designation of Super Silt Fencing needs to be shown on the SESC Plan

**C. Wall Design -** the plan does not include any details of the proposed retaining wall that will be constructed along the rear of the Truck Loading area. Issues that need to be considered:

1. Height of the proposed wall will be 15 ft. above existing grade in the center section, and as currently designed conflicts with the Town's 12" water main. Detailed construction plans for the wall including strctural design will need to be prepared by a Professional Engineer and incorporated into the site plan.
2. The applicant's current proposal to relocate the water line and install it within the raised fill area under the Truck Loading area will require review and approval from the Town Water Department. Should the Town agree to allow for the relocation of the main and associated dedication of a new easement the submission will need to include a detailed staging plan for this process. Since the wall cannot be constructed until the existing water main is taken out of service and since the proposed relocation of the water main is in an area of proposed fill that will be supported by the new wall the logistics of accomplishing relocation will be somewhat involved. As I have noted in several sections of this report it would be in the in the Town's and projects best interest if the layout of the loading area could be adjusted to avoid the necessity of relocating the existing water line. In its current orientation the northeast corner of the retaining wall encroaches 5+/- ft. and the northwest corner encroaches 35+/- ft. into the water line easement. Options that could be considered are:
  - a) Shifting the building forward toward Rt 31 by either eliminating the front row of banked parking and/or allowing the parking to intrude into the front landscaping buffer.
  - b) Rotating the building and related improvements counterclockwise so that the southwest corner shifts 35 ft. and the southeast corner shifts 5 ft. forward

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- c) Shifting the building to the east if the suggested 20,000 sf. expansion is not going to be part of the project, This would lessen the encroachment but still require implementing one or more of the suggestions under 2a or 2b above

**D. Phase 1 Carbonate Area District** – The applicant has submitted (ref: L) a Phase 1 Geology Review of the underlying conditions prepared by E&LP. The Document was in part based E& LP's review of earlier studies prepared by M2 Associates entitled "Preliminary Geologic Evaluation" (5/5/1998) and "Phase II Investigation of Carbonate Rock" (11/26/2001). It was my understanding that E&LP would review the prior soil borings/logs collected by M2 Associates and assess the that information in relation to the currently proposed warehouse development project with that assessment addressing the requirements under the Town's Phase 1 Checklist. The E&LP document does not include any assessment of the propose project in relation to the data from the M2 reports and the mapping provided of the M2 Soil Boring Locations is not legible. In regards the addressing the specific Phase 1 Checklist requirements I note the following:

1. *US Geological Survey 7 1/2 minute topographic quadrangle maps with the parcel identified.* **Item Addressed**
2. *USDA Soil Conservation Service soil survey map indicating soils present on parcel.* **Item Addressed**
3. *Information from any special reports completed by NJ State Geological Survey, US Geological Survey, or NJ Department of Environmental Protection.* **Partially Addressed - M2 reports attached, but not mentioned or discussed by E&LP.**
4. *Site plan map at a scale of 1" = 1,000' identifying proposed development site and boundaries of site that are within the CRA and/or CDA as designated on the municipal CAD map.* **Item Addressed**
5. *Aerial photograph print for the proposed site and surrounding area (taken at a minimum scale of 1" = 1,000' obtained during periods of little or no foliage cover).* **Item Addressed**
6. *Location of all known water production wells and well log information within one-half mile of the project. Information sources shall include, at a minimum, the County Health Department and the New Jersey Department of Environmental Protection.* **Item Not Addressed - Locations and well logs not provided or addressed in the report.**
7. *A project sketch plat at a minimum scale of 1" = 200' with existing surface water bodies location of any existing water production wells, faults, outcrops, springs, sinkholes, disappearing streams, and surface water flows.* **Not Addressed –**
  - a) **Documentation not included in report.**
  - b) **No drawings attached showing proposed site development with structure locations or any of the other required features to note.**
  - c) **No site reconnaissance performed to determine presence or locations of features.**
  - d) **No Submitted project sketch plat showing the locations of the previous test completed by M2**
8. *Written narrative describing proposed activity.* **Not Adequately Addressed. The Project Description consist of one sentence "Construction of a 100,000 sf warehouse structure with office area and associated parking and loading docks". The assessment needs to include all actively include the major Cut/Fill operation and the installation of the infiltration basin Applicant shall update this section and include in report.**

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9. Does the proposed project include the use, storage or manufacturing of toxic or hazardous materials? \_\_\_no \_\_\_ yes **Completed – Answer “No”**
10. Other published geologic information which applicant deems pertinent. (Information from other geologic investigation programs is on file with the municipal clerk.) Please specify: **Partially Addressed - Previous on-site investigations included, but not discussed.**

**Based upon the above I find that the Phase 1 submission is incomplete and that the required documentation must be filed before we can determine if a Phase II is warranted.**

3. **Stormwater Management Issues-** It should be noted that this submission and analysis is based upon the Town’s old Stormwater Control Ordinance (SCO) and that I was just informed on Thursday that the updated Stormwater Control Ordinance (SCO), mandated by NJDEP and adopted by the Town in December has been reviewed by the HCPB and was **approved on February 4, 2021** which becomes the effective date of the new regulations. Under the provisions of NJAC 7:8-1.6 and “clarification” listed under NJDEP’s FAQ page state that any application submitted to the municipality for approval of the Board **shall comply to the Stormwater regulations that are effective at the time of filing** with the stipulation that the submission included an Application Form (Subdivision or Site Plan) and included all accompanying documents required by the Ordinance. In this case, the application was filed on November 10, 2020 with the updated documentation filed on January 27, 2021. Based upon my understanding of the DEP Regulations this project would fall under the old SCO regulations since it is a Site Plan application along with a complete SWM analysis. Based upon review of SWM Report (H-1) I note the following:

**A. Design Methodology –** According to the Site Plans, the existing property contains a total of 13.17 acres of mostly vacant wooded land. The proposed improvements will disturb roughly 9.96 acres of land and will create around 6.49 acres of new impervious surface, therefore making this a major development and shall comply with the Township’s Land Use Ordinance and N.J.A.C. 7:8 regulations for quantity, quality and groundwater recharge.

**1. Non-Structural Stormwater Management Strategies**

- a) The applicant has only included a narrative for six (6) of the nine (9) non-structural strategies per NJAC 7:8-5.3. The applicant must provide a qualitative narrative to identify how the remaining non-structural strategies have been incorporated into the site design to the maximum extent practicable. Environmental or safety justifications must be provided for any strategy not being addressed.
- b) The applicant has also included a completed Low Impact Development Checklist in Appendix L. Section 3.2.I of this checklist states the there is no groundwater infiltration proposed, instead the basin uses an underdrain system. The site plans and construction details do not show underdrain system and the report states that the basin has been designed to infiltrate. The applicant should clarify this disparity.

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## **2. Groundwater Recharge**

- a) The applicant has provided NJDEP's Annual Groundwater Recharge Analysis spreadsheet in Appendix J. The site creates a post-development annual recharge deficit 401,829. The applicant has designed the basin to infiltrate 403,452 cubic feet, therefore, satisfying the groundwater recharge requirement.
- b) As stated above in 3.1.1(b), the applicant has made a comment in the Low Impact Development Checklists that due to the underlain limestone and carbonate rock area of the site, no groundwater infiltration is proposed. This contradicts their analysis in the report and must be addressed.

## **3. Stormwater Quantity**

- a) The applicant has demonstrated compliance with §88-92.B(1)(c) and N.J.A.C. 7:8-5.4 by designing the post-development stormwater peak runoff rates for the 2-, 10-, and 100-year storms to be 50%, 75%, and 80%, respectively, of the pre-development peak runoff rates.
- b) Additionally, the applicant has incorporated the minimum time of concentration (T<sub>c</sub>) standard set by Technical Release 55 of 6-minutes for the post construction quantity calculations and appropriately determined the runoff curve number.

## **4. Stormwater Quality**

- a) The proposed development will result in the increase of more than ¼-acre of impervious coverage. As such, the applicant must meet the standard of 80% TSS reductions for all post-development runoff.
- b) The applicant is proposing to satisfy the water quality standard through the use of an infiltration basin which creates an 80%-90% TSS Reduction depending on the minimum depth of the Soil Bed based on NJDEP's Best Management Practice (BMP) Manual. The applicant has designed to the depth of the soil bed to be 2-feet minimum which would create a TSS removal of 80%, therefore satisfying the quality standards set by §88-92.C and N.J.A.C. 7:8-5.5.

## **B. Technical Details**

### **1. Soil Data:**

- a) The permeability testing results shown on sheet 6 of the plans does not match the results provided in the Stormwater Management Report (H-1). The documentation must be consistent with a clarification/correction provided and our office.
- b) Coordination with and assessment of subsurface conditions under the Carbonate Rock Study must be provided (ref: item 2D).

### **2. Plan Details** must be addressed as follows:

- a) The underdrain shown (sheet 20) in the detail of the Outlet Control Structure (OCS) is not a component of an Infiltration Basin and must be removed.
- b) A full detailed cross section of the SWM Basin must be provided to show the details of the earthen berm construction including impervious core, the basin section with



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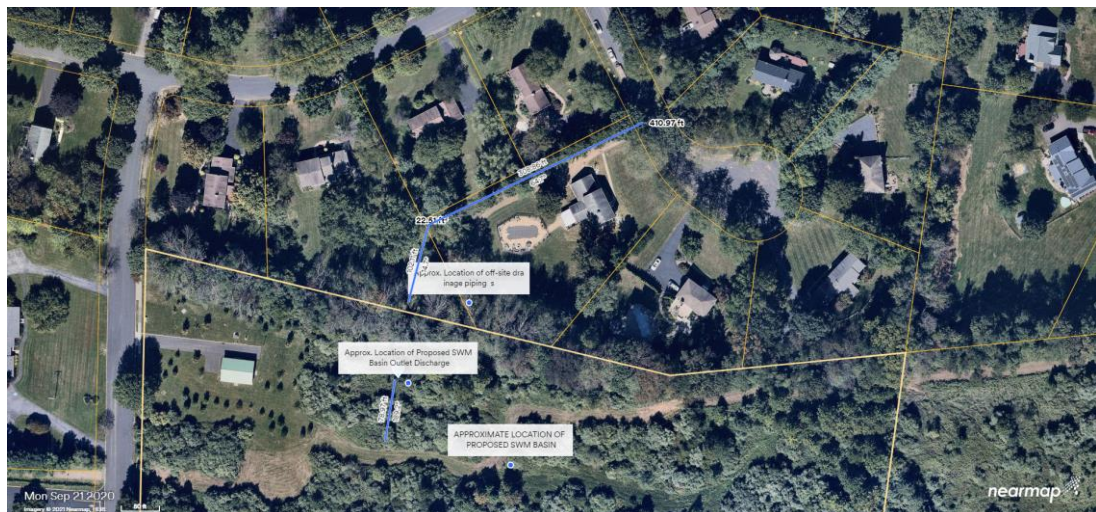
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noted stored water elevations and soil conditions below the bottom of the basin including depth to underlying bedrock and ground water.

- c) A full detail and profile of the outline pipe showing method of installation through the earthen berm with anti-seep collars and a specific detail of the outlet headwall
- d) A full profile and cross sections of the existing outfall ditch from the outfall headwall to the existing inlet headwall on the adjoining property
- e) Sheet 6 of the site plans shows a proposed A-inlet #1-#3 and the utilities profile view shows proposed B-inlets #1-#3, the correct type of inlet proposed should be noted.

3. **Outfall Conveyance** – Issues relating to the outfall from the SWM Basin need to be addressed as follows:

- a) The discharge from the proposed SWM Basin is into an onsite ditch that flows toward an existing inlet headwall on the adjoining property and then is conveyed through a piped storm drainage system running through another adjoining property out to Woods Edge Court in Clinton Township. A depiction of the outfall conveyance system is shown below along with photographs of the inlet headwall and outfall drainage ditch.



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**Outfall Ditch on PQ**

**Inlet Headwall on adjoining lot**

The site plan needs to include plan / profiles of the off-site conveyance system.

- b) A capacity assessment of the adjoining conveyance system and modification of the onsite SWM Basin OCS to limit the rate of discharge to the capacity level of the adjoining system.
- c) Given that that adjoining conveyance system connects with the Clinton Township Strom drainage system in Woods Edge Court I would assume that the system is also owned by Clinton Township. However, it would be beneficial to confirm that assumption so as noted under checklist item 18, the applicant should provide any information they have been able to obtain regarding that issue.

### **C. Stormwater Management Facility Operations and Maintenance Manual**

#### **1. The following required components must be added to the manual:**

1. Complete Permit Attachment D – Major Development Stormwater Summary form completed for the basin.
2. A note must be added to the O&M stating that “Written maintenance and repair records for all stormwater management systems shall be submitted annually to the Town Stormwater Coordinator by the responsible parties.”
3. The proposed Infiltration Basin must be encumbered by designated Stormwater Easement described by Meets and Bounds description and recorded along with the O&M Manual.

## **4. Utilities**

### **A. Sanitary Sewer-**

1. The applicant is proposing a sanitary sewer connection from the proposed warehouse into the Clinton Township MUA system that follows the proposal established 15 years ago for the Fallon Office Project. The connection line will run from the building out to Moebus Place and then north Moebus Place for a connection into an existing Clinton

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Twp MUA manhole in the intersection of Moebus Place and River Bend Drive as shown in the detail on sheet 8. Under the prior plan Fallon obtained the required NJDEP-TWA permits for this extension however those have now expired.

2. If the applicant is following the Fallon layout from 2006 then they would also need to obtain NJDEP-TWA permits for the following:
  - a) A TWA Permit for CT-MUA permit covering the portion from the connection to the CT-MUA manhole in River Bend Drive up Moebus Place to the Municipal Boundary
  - b) A TWA Permit for the Town of Clinton to cover the remaining portion of the line in Moebus
3. The applicant needs to open a line of communication with the Town of Clinton Sewer Department to determine how the Town now wants to serve the project. In 2006 the only viable connection was to the CTMUA manhole in River Bend Road, however, now it may be possible for the applicant to connect with the Town of Clinton Manhole that was installed as part of the Ansuya Development. If the connection is feasible then the Town may want the applicant to follow that option.
4. One advantage that this project over the prior one is that Puleo only requires 3, 750 gpd of conveyance and treatment capacity for the warehouse whereas the Fallon required 10,000 gpd of treatment capacity.

#### **B. Potable Water –**

1. Similar to item “A” The applicant needs to open a line of communication with the Town of Clinton Water Department to determine how the Town now wants to serve the project.
2. As noted above the major issue is related to whether or not the Town will allow for the relocation of the Water Line along rear of this property or the current proposal for connection into the Town’s system.
3. Comments from the Jack Daniels (ref: M) relating to the water service must also be addressed.

#### **C. Gas & Electric-**

1. Underground Gas and Electric service are shown as connections to existing facilities on Moebus Place
2. The applicant needs to call for a utility mark-out in order to determine the location of the existing lines in Moebus Place. Based upon the photograph under 1B-4b it appears that there are existing underground telephone lines under the existing sidewalk on Moebus Place.

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5. **Landscape & Lighting** – I will defer to Jim Kyle’s report for her comments relating to the proposed onsite lighting and landscape improvements
6. **Impact Statement Report** – The applicant has provided an EIS. The Board and Town Environmental Commission should review this document and direct any questions to the applicant
7. **Construction Details** – I am reserving comment on the construction details until some of the above referenced design issue have been resolved.
8. **Outside Agency Approvals**
  - A. **HC PB Board** for Major Site Plan (B-7) approvals.
  - B. **SESC Plan** –.The Board should withhold a vote on the site plan until the applicant has obtain input/approval from HCSCD
  - C. **NJDEP - If required for possible**
    1. **Dam Safety review and classification of the SWM Basin**
    2. **Obtaining an Absence/Presence LOI – as may be directed by the Board**
    3. **Possible TWA permit if warranted based upon means and methods of connection**
  - D. **NJDOT- determination to be made based upon any limitations imposed by DOT with issuance of original permit for driveway access.**
  - E. **Town of Clinton Water & Sewer Department Permits.**

The above represent my initial comments on the application. I will attend the Board meeting on March 2<sup>nd</sup> to hear the applicant’s presentation and will address any questions/comments relating to any comments.

Very truly yours,



Robert J. Clerico, P.E.  
Board Engineer:  
RJC

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CC:

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