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November 12, 2020

VIA EMAIL AND USPS

Dawn Farrell, Administrative Clerk
TOWNSHIP OF MONROE PLANNING BOARD
125 Virginia Avenue, Suite 5A
Williamstown, New Jersey 08094-1768

Re: Amended Preliminary and Final Major Site Plan (2nd Review)
Sahara Sands
Blue Bell Road and Coles Mill Road
Block 9301, Lots 10-18 & 20 & Block 9403, Lot 1 & Block 8001, Lot 1
Zones: RD-RR, Rural Development-Residential Receiving District and RD-A, Rural
Development Agricultural District
Applicant: Sahara Sand Inc. t/a Sahara Sand of Franklin, Inc.
Application No 498-SP
MC No MMP-067

Dear Ms. Farrell:

The above referenced application is a request for amended preliminary and final major site plan approval.

1.0 Project Description

1.1 Applicant's Proposal

The applicant requests amended site plan approval to include additional lots in Monroe Township for their resource extraction mining operations. Applicant now proposes to mine a total of 25 acres during the mining permit period from 2019 to 2024 and add a new service road around the perimeter of the existing and proposed mining areas. A mining permit renewal was obtained by the applicant in 2019 for the subject area; however, amended site plan approval was not obtained. The Planning Board previously granted non-conforming use approval in December of 1992 and final major site plan approval in October of 1993 for mining operations on Lot 10. Mining operation permits were subsequently issued for the period of 1995 through 2019. The mining operation is also situated in a portion of Franklin Township.

The applicant indicates 25 acres will be mined in the permit period from 2019-2024. The plan however shows new mining areas 6-20 which total 59.132 acres. The plan also has a note indicating 25 acres for permit period 2019-2024 and



future mining of 32.87 acres (total 57.87 acres). The applicant shall address the difference in numbers and indicate which mining areas make up the 25 acres to be mined for the 2019-2024 permit period. In addition, the area between mining areas 4 & 5 and mining areas 6-20, cross hatched as part of areas to be mined, is not noted. Is this area part of the 2019-2024 permit period?

The plan indicates the proposed hours of operation for processing are Monday-Friday 5:30am–8:00pm and Saturday 6:00am–6:00pm. The proposed hours of operation for trucking are Monday-Friday 6:00am–7:00pm and Saturday 6:00am–6:00pm. However, the Franklin Township resolution indicates the plant opens at 5:30am and runs until 8:00pm Monday through Saturday. The facility is closed on Sundays. The applicant shall clarify the hours of operation.

The applicant received a Certificate of Filing from the NJ Pinelands Commission on July 1, 2019 for their previous requested lots. An updated Certificate of Filing should be provided which includes the additional lots being requested per this amended application.

1.2 Existing Conditions

The mining operation is a 256.3988± acre parcel overall with 25 acres proposed for resource extraction in the next mining permit period from 2019-2024. The property is located at the intersection of Blue Bell Road and Coles Mill Road. Block 9301, Lots 10-18 & 20 and Block 8001, Lot 1 are zoned RD-RR, Rural Development-Residential Receiving District. Block 9403, Lot 1 is zoned RD-A, Rural Development Agricultural District. The site's resource extraction area has portions located in both Franklin Township and Monroe Township. Its main access is located off of Coles Mill Road.

1.3 Surrounding Land Uses

The area is rural in nature with wooded parcels, farmland and a few scattered dwellings surrounding the property in question.

2.0 Materials Reviewed

We have reviewed the referenced submission, encoded by the Planning Board as #498-SP 03172020, received on March 24, 2020 and #498-SP 10022020, received on October 12, 2020. consisting of the following:

<i>Sheet</i>	<i>Title</i>	<i>Date</i>
---	Cover Letter from Dawn Farrell, Administrative Clerk	October 6, 2020



---	Cover Letter from Dawn Farrell, Administrative Clerk	March 19, 2020
---	Site Plan Checklist (Amended)	---
---	Site Plan Application (Amended)	Revised to September 29, 2020
---	Addendum to Application	---
---	NJ Pinelands Certificate of Filing	July 1, 2019
---	Gloucester County Planning Board Review	September 3, 2019
---	Franklin Township, Gloucester County Planning Board Resolution SP19-1	November 19, 2019
1 of 10	Title Sheet	Revised to August 4, 2020
2 of 10	Existing Conditions Plan	Revised to August 4, 2020
3 of 10	Overall Operating Plan	Revised to August 4, 2020
4 of 10	Operations Plan	Revised to August 4, 2020
5 of 10	Operations Plan	Revised to August 4, 2020
6 of 10	Operations Plan	Revised to August 4, 2020
7 of 10	Operations Plan	Revised to August 4, 2020
8 of 10	Soil Erosion & Sediment Control Plan	Revised to August 4, 2020
9 of 10	Reclamation Plan	Revised to August 4, 2020
10 of 10	Notes & Details	Revised to August 4, 2020

The plans are signed and sealed by Bruce A. Jacobs, PE of Gravatt Consulting Group.

3.0 Zoning Requirements

3.1 Use

1. In accordance with § 175-160, Attachment 3, resource extraction operations are a conditional use, subject to the requirements of § 175-130 in the RD-RR, Rural Development-Residential Receiving District and RD-A, Rural Development Agricultural District.

3.2 Conditional Use Requirements

1. In accordance with § 175-130B, the following standards are to be achieved and maintained in order to receive conditional use approval of a resource extraction use or activity:
 - (1) Resource extraction standards. Resource extraction operations shall be approved only if the applicant can demonstrate that the proposed resource extraction operation:



- (a) Is designed so that no areas of excavation, sedimentation pond, storage area equipment or machinery or other structure or facility is closer than 200 feet to any property line, unless it can be demonstrated that a distance between 100 feet and 200 feet will not result in greater off-site environment impacts. The plan conforms to this requirement.
- (b) Is to be located on a parcel of land of at least 20 acres. The plan conforms to this requirement.
- (c) Provides that all topsoil that is necessary for restoration will be stored on the site and will be protected from wind or water erosion. The applicant shall provide testimony regarding intended compliance with this requirement.
- (d) Is fenced or blocked so as to prevent unauthorized entry into the resource extraction operation through access roads. The plan indicates there is an existing gate at the existing entrance.
- (e) Provides ingress to and egress from the resource extraction operation from public roads by way of gravel or porous paved roadways. The plan appears to conform to this requirement. The proposed haul road surface treatment should be noted on the plan.
- (f) Is designed so that surface runoff will be maintained on the parcel in a manner that will provide for on-site recharge to groundwater. The plan appears to conform with this requirement. Testimony to be provided. Defer to Engineer to confirm compliance.
- (g) Will not involve excavation below the seasonal high water table, unless the excavation will serve as a recreational or wildlife resource or a water reservoir for public, agricultural or industrial uses or for any other use authorized in the areas in which the site is located, provided that in no case shall excavation have a depth exceeding 65 feet below the natural surface of the ground existing prior to excavation unless it can be demonstrated that a depth greater than 65 feet will result in no significant adverse impact relative to the proposed final use or on off-site areas. The plan notes that “excavation below the seasonal high water table will serve as a recreational resource for public use at completion of mining and reclamation activities”. Testimony to be provided. Defer to Engineer to confirm compliance with maximum depth requirement.
- (h) Will be carried out in accordance with an extraction schedule which depicts the anticipated sequence, as well as the anticipated length of



time, that each of the twenty-acre units of the parcel proposed for extraction will be worked. This shall not preclude more than one twenty-acre unit from being worked at any one time, provided that there is a demonstrated need for additional units, restoration is proceeding on previously mined units and the area of clearing does not exceed that specified in Subsection B(1)(j) below. The applicant should provide testimony regarding compliance with this standard.

- (i) Will involve restoration of disturbed areas at the completion of the resource extraction operation in accordance with the requirements of Subsection B(2), Restoration standards, of this section and the implementation of the restoration plan is secured by a letter of credit, surety bond or other guaranty of performance. The applicant should provide testimony regarding compliance with this standard.
- (j) Will not involve clearing adjacent to ponds in excess of 20 acres or any areas necessary to complete scheduled operations; or will not involve unreclaimed clearing exceeding 100 acres or 50% of the area to be mined, whichever is less, for surface excavation at any time. The applicant should provide testimony regarding compliance with this standard.
- (k) Will not result in a substantial adverse impact upon those significant resources depicted on the Special Areas Map, Figure 7.1 of the Pinelands Comprehensive Management Plan. The applicant should provide testimony with regard to compliance with this standard.

2. In accordance with § 175-130B(2), all parcels of land which are used for resource extraction operations shall be restored as follows:

- (a) Restoration shall be a continuous process, and each scheduled unit of the parcel shall be restored such that ground cover be established within two years and tree cover established within three years after resource extraction is completed for each portion of the site mined. The applicant should provide testimony with regard to compliance with this standard.
- (b) Restoration shall proceed in the same sequence and time frame set out in the extraction schedule required in the preceding subsection. The applicant should provide testimony with regard to compliance with this standard.
- (c) All restored areas shall be graded so as to conform to the natural contours of the parcel to the maximum extent practical; grading techniques that help to control erosion and foster revegetation shall be utilized; the slope of surface of the restored surfaces shall not exceed one foot vertical to three



feet horizontal. The plan reclamation notes indicate soil erosion and sediment control standards will be followed and although restoration regrading may vary, it would not exceed a 3:1 slope.

- (d) Topsoil shall be restored in approximately the same quality and quantity as existed at the time the resource extraction operation was initiated. All topsoil removed shall be stockpiled and used for the next area to be restored, unless it is immediately reused for reclamation that is currently underway. The applicant should provide testimony with regard to compliance with this standard.
- (e) Drainage flows, including direction and volume, shall be restored to the maximum extent practical to those flows existing at the time the resource extraction operation was initiated. Applicant shall provide testimony regarding intended compliance.
- (f) Any body of water created by the resource extraction operation shall have a shoreline not less than three feet above and three feet below the projected average water table elevation. The shoreline both above and below the surface water elevation shall have a slope of not less than five feet horizontal to one foot vertical. This requirement shall apply to any water body or portion of a water body created after December 5, 1994. For any water body or portion of a water body created prior to December 5, 1994, this requirement shall apply to the extent that it does not require grading of areas which have not been disturbed by mining activities. Where grading would require such disturbance, a reduction in the distance of the graded shoreline above and below the average water table elevation shall be permitted. The plan appears to comply with this requirement. The average high water elevation is noted as El. 114. As such, a maximum 5:1 slope should be carried from El. 117.0 – El 111.0. It is recommended that El. 117.0 and El. 110.0 be shown on the grading plan.
- (g) All equipment, machinery and structures, except for structures that are usable for recreational purposes or any other use authorized in the area, shall be removed within six months after the resource extraction operation is terminated and restoration is completed. The plan includes a note regarding the facility's intended compliance with same.
- (h) Reclamation shall to the maximum extent practical result in the reestablishment of the vegetation association which existed prior to the extraction activity and shall include:

[1] Stabilization of exposed areas by establishing ground cover vegetation.



- [2] Reestablishment of the composition of the natural forest and shrub types that existed prior to the extraction activity through one of the following:
- [a] The planting of a minimum of 1,000 one-year-old pitch pine seedlings or other native Pinelands tree species per acre in a random pattern.
 - [b] Cluster planting of characteristic Pinelands oak species, such as blackjack oak, bear oak, chestnut oak and black oak, and shrubs such as black huckleberry, sheep laurel and mountain laurel, at a spacing sufficient to ensure establishment of these species.
 - [c] A combination of the planting techniques set forth in Subsection B(2)(h)[1][a] and [b] above.
 - [d] The use of other planting techniques or native Pinelands species as may be necessary to restore the vegetation association which existed prior to the extraction activity.

The plans restoration notes comply with these requirements.

- (i) Slopes beyond a water body's shoreline shall be permitted at the natural angle of repose to the bottom of the pond. The applicant should provide testimony regarding their intended compliance standard.
- (j) The letter of credit, surety bond or other guaranty of performance which secures restoration for each section shall be released after the requirements of Subsection B(2)(a) through (i) above are determined by the Township or the Pinelands Commission, as appropriate, as being met and is replaced with a maintenance guaranty for a period of two years thereafter.

3.3 Bulk Requirements (RD-RR)

In accordance with § 175-160 and § 175 Attachment 3.2, there are no specific bulk standards cited for Resource Extraction Operations nor are there any new buildings proposed. As such, an analysis for compliance with any bulk requirements in addition to the conditional use requirements outlined above is not required.

4.0 Design, Performance and Evaluation Standards

4.1 Sidewalk

The resources extraction site does not have any frontage within Monroe Township. As such, any sidewalk requirements would be handled by Franklin Township.



4.2 Off-Street Parking and Loading

In accordance with § 175-123J, there are no specified parking requirements for a resource extraction operation. The applicant shall provide testimony regarding the adequacy of the existing onsite parking and loading to support the proposed mining renewal permit.

5.0 General Comments/Recommendations

1. It is recommended that silt fence be provided around the proposed topsoil stockpile until vegetative cover of same is established.
2. There is an existing structure on Block 9301, Lot 16, noted as being a warehouse that is not noted to be removed. The intent of the structure to remain and intended user should be provided. Said warehouse would be located in the required 200' setback to the property line.
3. Will the haul road be located differently for the 2019-2024 permit period than as shown for the overall 6-20 mining areas, being only a portion will be active during that time period.
4. The anticipated 25 acres to be part of the 2019-2024 permit period should be indicated on the plan.
5. The proposed clearing limits should be shown on the plan.
6. Topsoil stockpile areas shown on the plan appear small in comparison to the total mining area. It is assumed that a sizeable stockpile will be provided for each permit period. It is recommended that the topsoil stockpile area associated with the 25 acres to be mined for the 2019-2024 mining period be placed and shown on the plan to accommodate said area, as was provided on the previous submitted plan.

6.0 Fees, Contributions and Obligations

6.1 Escrow

The applicant must contact the Township's Finance Office to settle any outstanding review escrow accounts prior to the plans being signed.

6.2 Permit, Reporting and Compliance

In accordance with § 175-130C, Approvals authorizing resource extraction shall be effective for a period of two years in all areas of the Township and in the discretion



of the Township Council for a period of up to five years in all Pinelands areas, provided that the requirements of Subsections C(1) and (2) below are met. Nothing in this section shall be construed to prohibit any person from securing additional permits, provided that the requirements of this section are met.

- (1) In all Pinelands areas, operators of all approved resource extraction operations shall, on a yearly basis, certify in writing, and to the satisfaction of the Town Council and the Pinelands Commission, that all mining, restoration and other activities have been to continue to be conducted in accordance with an approved resource extraction permit.
- (2) In all Pinelands areas, in the event that the Town Council and/or other Pinelands Commission determine that any mining, restoration or other activity deviates from the conditions of an approved resource extraction permit, the operator of the mining operation shall be immediately notified of the deviation. The notice shall state the nature of the deviation, order the action necessary to correct it and set forth the date, time and location of a meeting to be held within 10 days of the notice, at which the operator shall present all relevant information concerning the deviation and the action taken or to be taken to correct it. The order to take corrective action shall specify any activity which must be immediately ceased to prevent direct or indirect aggravation of the deviation or to avoid a danger to public health, safety or welfare. Such cessation shall continue until the deviation has been resolved to the satisfaction of the Township Council and the Executive Director of the Pinelands Commission or until an agreement to resolve the deviation has been reached. Failure to resolve a deviation or to adhere to the terms and conditions of any agreement to resolve a deviation shall constitute sufficient cause for revocation of the permit.

7.0 Outside Agency Approval

This site plan is subject to the review and approval of all outside agencies with jurisdiction, if not already received, including but not limited to the following. Evidence of these approvals must be submitted to the Planning Board.

- New Jersey Department of Environmental Protection;
- New Jersey Pinelands Commission;
- Gloucester County Soil Conservation District;
- Gloucester County Planning Board;
- Monroe Township Fire Official;
- Any others as may be required.



Dawn M. Farrell, Administrative Clerk
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The above comments and/or recommendations are submitted for your review and consideration. Should you have any questions with regard to this matter or require additional information, please do not hesitate to contact our office at (609) 910-4068.

Best regards,

MASER CONSULTING, INC

Pamela J. Pellegrini, P.E., P.P., C.M.E.
Project Manager

PJP/rld

cc: Stephen Boraske, Esquire
Douglas A. White, PE, CME

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