



January 25, 2021

Dawn M. Farrell, Administrative Clerk
 Township of Monroe Planning Board
 125 Virginia Avenue, Suite 5A
 Williamstown, NJ 08094

Re: File #498-SP – Sahara Sands Inc. t/a Sahara Sands of Franklin Inc.
Application for Preliminary & Final Major Site Plan Approval
 Blue Bell Road and Coles Mill Road, Williamstown, New Jersey
 Block 9301, Lots 10-16; Block 9403, Lot 1
 Zoning District: RD-RR (Rural Development Residential Receiving) &
 RD-A (Rural Development Agricultural)
 T&M# MRPBR1350
Technical Review #3

Dear Board Members:

We have received the following for review:

<u>Sheet</u>	<u>Title</u>	<u>Materials Received for Review</u>	<u>Date/Last Revised</u>
Prepared by Gravatt Consulting Group			
1 of 10	Title Sheet		12-20-18 / 12-09-20
2 of 10	Existing Conditions		12-20-18 / 12-09-20
3 of 10	Overall Operations Plan		12-20-18 / 12-09-20
4 of 10	Operations Plan		12-20-18 / 12-09-20
5 of 10	Operations Plan		12-20-18 / 12-09-20
6 of 10	Operations Plan		12-20-18 / 12-09-20
7 of 10	Operations Plan		12-20-18 / 12-09-20
8 of 10	Soil Erosion & Sediment Control Plan		12-20-18 / 12-09-20
9 of 10	Reclamation Plan		12-20-18 / 12-09-20
10 of 10	Notes & Details		12-20-18 / 12-09-20
	Applicant's Engineer Response Letter		12-22-20
1 of 1	Drainage Narrative		12-20 /
1 of 1	Traffic Narrative		12-20 /
	Gloucester County Planning Board Report of Action		11-24-20 /

Site Description

The subject property is the existing Sahara Sand facility located on the corner of Coles Mill Road (CR 538) and Blue Bell Road. The Township line between Franklin and Monroe Townships runs diagonally through the center of the site. The portion of the site located within Monroe Township is Block 9301 Lots 10-16 and Block 9403 Lot 1. The entire site is comprised of approximately 206.89± acres (100 acres in Monroe Township) and is bordered by woods to the north, dwellings to the east (with a wooded buffer in between), Coles Mill Road to the south and Blue Bell Road



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to the west. The site has one driveway entrance located along Coles Mill Road, roughly 1,500 feet from the Blue Bell/Coles Mill intersection.

The Applicant states that mining operations were conducted on this site by Sil-Kemp Concrete, Inc. starting in the 1960's. Mining continued until the early 90s at which time the Applicant bought Sil Kemp Concrete. The Applicant received a Certificate of Non-Conforming Use in 1992 and Preliminary and Final Major Site Plan approval in 1993. A permit was then issued by the Township permitting mining operations on Lot 10 from 1995 through 2019. The Applicant seeks approval to continue their resource extraction and mine Lots 11-16, which were not a part of the original site plan approval. The mining area will change but the facility operations will generally remain the same. The Applicant proposes to mine approximately 25 acres, designated in the area labeled Tax Lot 11, during the next mining permit period (2019 – 2024) and states they have already received the mining permit renewal from the Township for the subject area. ~~It also lists future mining area for Tax Lot 11 equal to 32.87 acres, this would total 57.87 acres. The plans are then showing additional Mining areas 6-20 that total 59.133 acres and Mining areas 4-5 which total 41.828 acres. The applicant will need to clarify the difference in numbers and indicate which areas will make up the 25 acres that are to be mined during the 2019-2024 permit period.~~ The revised plans show 25 acres will be mined during the 2019-2024 permit period (labeled as mining areas 4 through 8). An additional 44.8 acres is labeled as future mining areas (labeled as mining areas 9 through 17), for a total of 69.8 acres.

These submittals have been reviewed for compliance with the submission requirements of the Monroe Township Land Use Ordinance. We note the following:

Submission Requirements

We reviewed the requirements set forth in the following Ordinance Sections: §175-61, Major Site Plan Review; §175-71, Preliminary Major Site Plan Review; §175-72, Final Major Site Plan Review; §175-140, Stormwater Management and §175-130, Resource Extraction. **In our letter dated January 25, 2021 we deemed this application complete.**

Requested Waivers

- 1. Environmental Assessment Waiver - A NJ Pinelands Certificate of filing has been submitted in lieu of providing an Environmental Assessment. We recommend any environmental documents submitted to the Pinelands be submitted to the Planning Board.**
- 2. Topography extending 200 and 300 feet beyond the property line. We are in support of this waiver. The submitted topography adequately illustrates the existing conditions.**
- 3. Not showing existing Utilities on the site - A waiver was requested for not providing existing electrical utilities on the site. We are in support of this waiver. A note was added to sheet 3 that no water, sewer, or storm utilities exist. No new utilities are proposed.**
- 4. Stormwater Maintenance Plan – a waiver was requested. A Stormwater Maintenance**



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- Plan will need to be provided for the existing basin.**
- 5. Stormwater Report – a waiver was requested. A Drainage Narrative was provided in lieu of a Stormwater Report. Testimony should be provided by the applicant’s engineer regarding the stormwater management on site.**
 - 6. Bearings provided to the nearest tenth of a second – a waiver was requested. The bearings were provided to the nearest second. We support this waiver.**
 - 7. Not providing a Stormwater Plan in a CAD file format 15 or higher – a waiver was requested. We are in support of this waiver.**

Required Waivers

There do not appear to be any additional waivers required.

Requested Variances

There do not appear to be any variances requested.

Required Variances

There do not appear to be any variances required.

Zoning Requirements

Resource Extraction is a conditional use in both the RD-RR and RD-A Zoning Districts. We defer to the Board’s Planner for review of the zoning issues relative to this application.

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- A. §175-93 Buffers
We defer all buffer issues to the Board’s Planner.
- B. §175-96 Curb and Gutters
The site currently has concrete curb and apron at the site entrance along Coles Mill Road. We defer to the County Engineer regarding the need for improvements within the County R.O.W. **The applicant will need to provide this approval to the Township and our office. Per applicant response letter dated December 22, 2020 County Planning Board approval is pending.**
- C. §175-98 Easements
We defer all easement issues to the Board’s Planner.
- D. §175-99.1, Environmental Assessments
 1. The Major Site Plan Check List provided by the Applicant states that an Environmental Analysis was not applicable. **We recommend, at a minimum, a letter from the Applicant’s professionals addressing significant environmental impacts or issues raised by the New Jersey Pinelands Commission, including all reports that were submitted to the**



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Pinelands Commission. A NJ Pinelands Certificate of filing has been submitted in lieu of providing an Environmental Assessment. We recommend any environmental documents submitted to the Pinelands be submitted to the Planning Board.

E. §175-100 Fences, Walls and Screening

Note 20 on Sheet 10 states that each fence surrounding each area to be developed shall be a six (6) foot high chain link fence with no barbed wire topping. The plans should be revised to include the location of any permanent or temporary fencing as well as provide testimony as to the installation of the fence. The applicant will need to provide a detail for the proposed chain link fence. Current revised plans and response letter state that General Note 20 was removed from the plans. The applicant shall provide testimony as to how site security will be provided.

F. §175-116 Lighting

An Existing Lighting Detail is provided on Sheet 2. There does not appear to be any additional lighting proposed as part of this application.

G. §175-123 Off-street parking and loading

The plans show thirteen (13) 10' x 20' parking stalls located west of the weigh station.

H. §175-124 Off-Tract Improvements

No off-tract improvements are proposed on public property.

I. §175-129 Public Utilities

The plans do not show any stormwater, sewer or water pipes. **Any utilities that exist on site should be added to the plans. A note was added to sheet 3 that no water, sewer, or storm utilities exist. A waiver was requested for showing electrical utilities. We are in support of this waiver. No new utilities are proposed.**

J. §175-130 Resource Extraction

(1) The provided restoration plan appears to be in accordance with this section.

(2) Operation Note 5 on Sheet 3 states that the site will be used for public recreation at the completion of mining & reclamation.

(3) **The Applicant shall provide a signed acknowledgment from both the owner and the applicant that they are responsible for any resource extraction activities which are contrary to any provision of this chapter or of the approved resource extraction plan done by any agent, employee, contractor, subcontractor or any other person authorized to be on the parcel by either the owner or the applicant. Per response letter dated December 22, 2020, the applicant will supply under separate cover.**

(4) **A financial surety guaranteeing performance of the requirements of § 175-130, in the form of a letter of credit, certified check, surety bond or other recognized form of financial surety acceptable to the Pinelands Commission. The financial surety shall be equal to the cost of restoration of the area to be excavated during the**



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duration of any approval which is granted. The financial surety, which shall name the Commission and the Township as the obligee, shall be posted by the property owner or his agent with the Township. Per response letter dated December 22, 2020, the applicant will supply under separate cover.

- (5) Section 175-130.B(1)[e] Provides ingress to and egress from the resource extraction operation from public roads by way of gravel or porous paved roadways. ~~The proposed haul road surface treatment should be noted on the plan.~~ **Satisfied.**
- (6) Section 175-130.B(1)[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. **We defer to the Pinelands Commission.**
- (7) Section 175-130.B(2)[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. **The applicant should provide testimony with regard to compliance to this standard. Per response letter dated December 22, 2020, the applicant will provide testimony and a Drainage Narrative was submitted.**
- (8) Section 175-130.B(2)[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. ~~Additional contours for bottom of the overall excavation should be shown on the operations plans in accordance with the proposed detail.~~ **Satisfied.**
- (9) **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, and continue to be, conducted in accordance with an approved resource extraction permit. Per response letter dated December 22, 2020, the applicant will supply under separate cover.**
- (10) **Liability insurance. The applicant shall evidence liability insurance in sums not less than \$100,000/\$300,000 per accident. Such insurance shall indemnify the Township from the operations of the applicant. A certificate or copy of said policy shall be delivered to the Municipal Clerk for filing. Per response letter dated December 22, 2020, the applicant will supply under separate cover.**
- (11) **Water sampling. Prior to the obtaining approval of a permit which includes the**



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creation or existence of a body of water, the applicant shall submit testing results in conformance with the New Jersey Department of Environmental Protection guidelines for water quality monitoring. The aforesaid results shall be accepted pursuant to appropriate water quality standards. Minimum requirements for testing shall be the standard elements for sampling potable water, including chemical and bacteria samples. The rate of sampling shall be semiannual, sampling to be done in April and October, and reported to the Township on or before May 1 and November 1 of each and every year for the respective sampling. Any new application for a license must submit water sample results with the application regardless of the time of year. More frequent sampling will be required if it is determined that the water quality is deteriorating from background water quality. Per response letter dated December 22, 2020, the applicant states that water sampling is done 2 times per year.

(12) The plan indicates that the hours of operation for processing are Monday-Friday 5:30am-8:00pm and Saturday 6:00am-6:00pm. The proposed hours for trucking are Monday-Friday 6:00am-7:00pm and Saturday 6:00am-6:00pm. **Section 175-30.G(3) states that no person shall conduct any resource extraction operations or trucking activities Monday through Saturday between the hours of 5:30 p.m. and 7:00 a.m. No such activity shall be permitted at any time on Sunday. The applicant will need to clarify the hours of operation in accordance with the ordinance. Satisfied. The revised proposed hours of operation are Monday through Saturday 7:00am-5:30pm.**

K. §175-132 Shade Trees

We defer all Shade Tree issues to the Board's Planner.

L. §175-133 Sidewalks

The project is located within Sidewalk Area 4. Sidewalk does not currently exist along Coles Mill Road or Blue Bell Road. Since the project site does not have any roadway frontage within Monroe Township, we defer to Franklin Township and the County on this issue. **Per response letter dated December 22, 2020, there are no existing sidewalks in the area and none are proposed as part of this project. Furthermore, sidewalks are not required by Franklin Township or Gloucester County.**

M. §175-134 Sight Triangles

Since the project site does not have any roadway frontage within Monroe Township, we defer to Franklin Township and the County on this issue.

N. §175-135 Signs

We defer all sign issues to the Board's Planner.

O. §175-140 Stormwater Management

(1) The Major Site Plan Check List provided by the Applicant states that Drainage Calculations were not applicable. **We recommend, at a minimum, a letter from the Applicant's professionals describing site drainage and stormwater facilities, comparing the existing and proposed conditions. All reports that were**



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~~submitted to the Pinelands Commission should be forwarded to the Board. The Applicant shall ensure that the proposed improvements do not result in any adverse impacts to surrounding properties. The report shall also address how the lake will safely discharge to downstream areas in the event that the lake level rises to a level where discharge would occur.~~ A Drainage Narrative Letter dated December 2020 was provided in lieu of a stormwater report. Testimony should be provided by the applicant's engineer regarding the stormwater management on site.

- (2) The Applicant shall provide a Stormwater Maintenance Plan, that meets the requirements set forth in the Ordinance and the BMP Manual. A copy of the Stormwater Maintenance Plan shall be filed with the town. The title and date of the maintenance plan and the name, address, and telephone number of the person with stormwater management measure maintenance responsibility as specified in the plan must be recorded on the deed of the property on which the measure is located. A waiver was requested. A Stormwater Maintenance Plan will need to be provided for the existing basin.

P. §175-141 Street and Traffic Control Signs

~~In addition to the stop sign a stop bar shall be provided along the driveway, approaching Coles Mill Road.~~ Satisfied.

Q. §175-147 Vegetation

We defer all landscaping and vegetation issues to the Board's Landscape Architect.

R. §175-151 Wetlands

Wetlands exist in the northeast end of the site and continue along the north property line, as shown on the Existing Conditions Plan. A 300' wetlands buffer is proposed.

S. Traffic Engineering Assessment

The Major Site Plan Check List provided by the Applicant states that a Traffic Study is not applicable. We defer the need for a Traffic Study to the County Engineer. **If a report is prepared, it should be provided to this Board for review. A waiver was requested, and we support this waiver. A Traffic Narrative Report was provided as of December 2020.**

T. Title Sheet Comments

- (1) ~~The Applicant shall update the certifications on the Title Sheet to list Monroe Township instead of Franklin Township.~~ Satisfied.

Bonds and Fees

This application is subject to the posting of a site improvement performance bond in an amount equal to 120% of the bondable site improvements cost as reviewed by the Township Engineer and a five (5%) percent escrow fee for the site inspection.



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Outside Agency Approvals

Evidence of approval by the following agencies shall be a condition of any approvals by the Monroe Township Planning Board.

1. Gloucester County Soil Conservation District
2. New Jersey Pinelands Commission
3. Gloucester County Planning Board
4. Franklin Township Planning Board

Should you have any questions regarding these comments, please do not hesitate to contact this office.

Very truly yours,
T & M ASSOCIATES

Kyle R. Humphreys, P.E.
Planning Board Engineer

cc: Stephen Boraske, Board Solicitor
Pamela Pellegrini, P.E., P.P., C.M.E., Board Planner