



# MARATHON

Engineering & Environmental Services

[WWW.MARATHONCONSULTANTS.COM](http://WWW.MARATHONCONSULTANTS.COM)

March 19, 2021

IA2 001.01

**Debbie Simone, Land Use Administrator**

**Township of Waterford Planning Board**

2131 Auburn Avenue

Atco, New Jersey 08004

**Re: Application for Conditional Use & Major Site Plan  
Insurance Auto Auctions Corporation  
1000 Jackson Road  
Block 5201, Lot 8; Block 5302, Lot 1; and  
Block 5402, Lots 2, 3, & 4.  
Supplemental Submission Prior to the March 29, 2021 Continued Joint  
Land Use Board Hearing  
Waterford Township, Camden County, New Jersey**

Dear Ms. Simone:

Marathon Engineering & Environmental Services, Inc. ("Marathon") is the consulting engineer assisting Insurance Auto Auctions Corporation (the "Applicant") with the above referenced project. On behalf of our client, please accept this letter as our responses to the most recent Engineering Letter dated January 7, 2021, issued by Key Engineers in connection with the above-referenced Application. This submission is being supplied in advance of the continued public meeting in connection with the comments and questions received from Board professionals, Board members, and representatives of members of the public. Applicant intends to refer to and rely upon this supplement and revision at the continued Planning Board meeting. This supplement contains documents that unambiguously comply with the Conditional Use impervious coverage limitation within the footprint of the Planned Light Industrial District, and which also address a number of requests raised by the Board Solicitor, Key Engineers, the Board Members, the Pineland's Commission, and the Fire Marshal. Please refer to the attached plan titled "Proposed Conditions Exhibit, Proposed Automobile Auction Facility", prepared by Marathon Engineering and dated March 19, 2021.

**Item 1 – Satisfying the 20% impervious coverage limitation for an "auto sales" conditional use in the Planned Light Industrial District Zone**

The plan meets the maximum impervious lot coverage requirement of §176-104H(2)(d) for an "automobile new and/or used sales and service establishments" conditional use in the Planned Light Industrial District zoned portion of the property

only. The total lot area in the Planned Light Industrial District zone is 89.844 acres, and does not include the County dedication along Jackson Road.

The areas to be used for vehicle storage will have the existing asphalt removed and replaced with gravel. New gravel is not considered impervious under the applicable Stormwater Management Rules that were in effect prior to March 2, 2021. See the State's Stormwater FAQ 10.3 in the attached PDF for reference.

The conditional use requirement states that "*Impervious lot coverage shall not exceed 20%*". As a result, gravel is excluded from the impervious coverage percentage calculation.

**The proposed impervious coverage (existing/proposed pavement, concrete and buildings) is 16.885 acres, which would account for 18.8% of the site area in the Planned Light Industrial District zoned portion of the property. Since the impervious lot coverage is less than 20%, the conditional use requirement is unambiguously satisfied for maximum impervious lot coverage.**

Additionally, this plan revision meets the Planned Light Industrial District zone bulk requirement for maximum lot coverage of 65%. The proposed coverage consisting of existing/proposed pavement, concrete, buildings and gravel is 40.537 acres, which would account for 45.1% of the lot area in the Planned Light Industrial District zoned portion of the property. **Since the total lot coverage is less than 65%, the Planned Light Industrial District zone bulk requirement is unambiguously satisfied for maximum lot coverage.**

## **Item 2 - Addressing the Pinelands inconsistencies in the Certificate of Filing**

The Pinelands Commission issued an Inconsistent Certificate of Filing for the project on November 6, 2020. The two inconsistencies were related to stormwater management - the are listed below:

1. *Groundwater mounding standard (N.J.A.C. 7:50-6.84(a)6iv3) - The Waterford Township land use ordinance and the CMP provide that groundwater mounds shall not cause stormwater or groundwater to breakout to the land surface or cause adverse impacts to adjacent water bodies, wetlands or subsurface structures, including, but not limited to basements and septic systems. The applicant has submitted a groundwater mounding analysis which indicates that the groundwater mounding caused by the proposed stormwater infiltration basin will result in adverse impacts to the adjacent wetlands.*

Response - As mentioned in Item 2 below, two small infiltration basins are now proposed to meet the Pinelands Commission stormwater management requirements. A groundwater mounding analysis is attached for each basin, and each basin will not generate a groundwater mound that will break out to the land surface of cause adverse impacts. The groundwater mounding analysis is based on an average tested infiltration rate of approximately 10/in/hr for the previously

conducted test pits throughout the site. See the attached groundwater mounding analysis for each basin for reference.

2. Infiltration basin design, siting and construction standards (N.J.A.C. 7:50-6.84(a)6iv4) - *The Waterford Township land use ordinance and the CMP provide that the use of stormwater management measures that are smaller in size and distributed spatially throughout the parcel is required to the maximum extent practical. This application proposes a single stormwater infiltration facility.*

Response - The attached plan depicts two smaller basins that will provide sufficient storage for the Pinelands groundwater recharge requirement, which is to store and infiltrate the stormwater runoff generated by the increase in impervious surfaced for the ten-year storm event.

This plan provides an impervious coverage of 16.885 acres. The impervious coverage that existed onsite prior to the adoption of the Pinelands Commission in 1978 is approximately 14.135 acres. Therefore, the increase in impervious coverage that falls under the jurisdiction of the Pinelands Commission is 2.750 acres. During the 10-year storm event (5.13 inches), the increase in impervious coverage will generate 48,844 CF when utilizing TR-55 methodology.

Additionally, the vehicle storage areas will have the existing asphalt sawcut and removed, and the surface will be replaced with gravel to provide a stabilized surface. The gravel will provide non-structural stormwater benefits by providing the following features: minimize impervious surfaces and break up or disconnect the flow of runoff over impervious surfaces, and minimize the decrease in the "time of concentration" from pre-construction to postconstruction. The gravel areas will therefore provide additional opportunities for infiltration and groundwater recharge throughout the entire site, as required by N.J.A.C. 7:50-6.84(a)6iv4.

Additional infiltration is also provided by using roof drains connected to underground infiltration pipes for all buildings, and infiltration areas within the employee parking lot.

**Based on the information provided above, the plan will very likely resolve the two items listed in the Inconsistent Certificate of Filing, and the plan should now be in compliance with all Pinelands standards.**

### **Item 3 - Addressing the Planning Board Engineer's Comments**

This plan will help to address two of the comments that were included in the review letter by the Planning Board Engineer. The first item is to provide "...additional precautions or protective measures..." (Operations Comment 2) and to increase the width of the infiltration trenches from five feet to eight feet (Stormwater Management Comment 4a).

In regard to providing additional protective measures, the Applicant proposes to install a Contech StormFilter within the Drop Zone in order to provide an additional factor of safety and additional TSS removal for stormwater runoff before conveying runoff to the infiltration basins. The StormFilter is provided in addition to what is required by the Pinelands Commission stormwater management regulations. According to the Contech literature, the StormFilter is capable of filtering sediments, oil and grease, soluble metals, organics, nutrients and total phosphorus based on the type of filter media. The location of the StormFilter is depicted on the attached plan in the northwestern corner of the Drop Zone. Additional calculations will be provided for the StormFilter in the final stormwater management report.

In regard to increasing the width of the infiltration trenches, the width will be increased from five feet to a maximum width of 78 feet. Therefore, more infiltration area will be provided that what was originally proposed.

### **Item 4 - Addressing the Fire Marshal Comments**

Based on our phone conversations with the Fire Marshal in February & March, 2021, it was brought to our attention that a fire tank could benefit the local community if it was easily accessible and sized for emergency use. In order to comply with the conditional use requirement of §176-104H(2)(b) that no structure be placed within the front yard setback, an anticipated location for the fire tank is depicted on the attached plan in a compliant location. The final location and size of the tank will be finalized based on future coordination with the Fire Marshal.

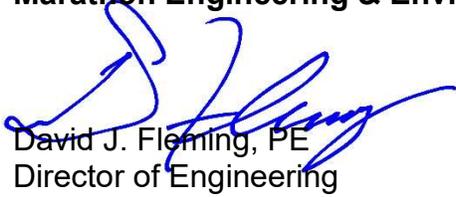
We have enclosed for this application the following documents:

1. Proposed Conditions Exhibit, prepared by Marathon Engineering, dated March 19, 2021.
2. Groundwater Mounding Calculations for the Infiltration Basins (2 sheets), prepared by Marathon Engineering, dated March 19, 2021.
3. State Stormwater Frequently Asked Questions (FAQ), item 10.3.

If you have any questions, or need additional information, please feel free to contact myself at this office at 856-241-9705 or by email at Dave.Fleming@marathonconsultants.com .

Sincerely,

**Marathon Engineering & Environmental Services, Inc.**



David J. Fleming, PE  
Director of Engineering



David J. Domen, P.E.  
Senior Project Engineer

Enclosures

cc: State Planning Commission (hand delivery)  
Pinelands Commission (via email & FedEx)  
Key Engineers (via hand delivery)  
Planning Board Solicitor (via email)  
Camden County Planning Board (via Fed Ex)