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ENGINEERS**
A Subsidiary of Artheon, Inc.

September 8, 2026

Giordano, Halleran & Ciesla, P.C.
125 Half Mile Road
Suite 300
Red Bank, New Jersey 07701

Attn: Mr. Marc D. Policastro, Esq.

**Re: Borough of Sayreville
HCI DP Land Acquisition LLC Site Plan
Block 14, Lot 1
Our File No. PSAP0014.06**

Dear Mr. Policastro:

As recently discussed this application has been scheduled for a public hearing at the Planning Board meeting on Wednesday, September 16, 2026.

Transmitted herein for your information please find one (1) copy of an Updated Technical Engineering Review as prepared by our office for the project. The items contained in this report will be discussed in further detail at the September 16, 2026 meeting.

Should you have any questions concerning this matter, please do not hesitate to contact this office.

Very truly yours,

A handwritten signature in black ink that reads 'Jay B. Cornell'.

Jay B. Cornell, P.E.
Borough Engineer's Office

JBC

cc: Planning Board Secretary
Peter Van den Kooy – Board Planner
Bohler Engineering

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NJ CERTIFICATE OF AUTHORIZATION NO. 24GA28359000 (CME)
NJ CERTIFICATE OF AUTHORIZATION NO. 24GA28412500 (ARTHEON)

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BOROUGH OF SAYREVILLE
HCI DP LAND ACQUISITION LLC
PRELIMINARY AND FINAL MAJOR SITE PLAN
– TECHNICAL ENGINEERING REVIEW –

Our File No.: PSAP0014.06

A. SITE GRADING AND GENERAL COMMENTS

1. The Applicant will be required to obtain and forward to the Borough and our office final approvals or letters of no interest from the following Government Agencies:
 - a. Middlesex County Planning Board Approval,
 - b. Middlesex County Road Opening,
 - c. NJDEP – Freshwater Wetlands Letter of Interpretation,
 - d. NJDEP – Freshwater Wetlands Permit,
 - e. NJDEP – Construction Activity Stormwater General Permit,
 - f. NJDEP – Treatment Works Approval
 - g. NJDEP – Safe Drinking Water Permit,
 - h. Middlesex County Utilities Authority Approval,
 - i. Borough of Sayreville – SESC Plan Certification,
 - j. Borough of Sayreville – Soil Removal/Fill Placement Permit,
 - k. Borough of Sayreville – Tree Preservation Permit,
 - l. Conrail – Right-of-Entry Permit,
 - m. Conrail – Railroad Utility Crossing.
2. An Engineer's Bond Estimate for the proposed site improvements should be submitted for the project.
3. The Applicant should arrange with all applicable utility companies for the installation of their underground supply lines and service connections. A written instrument from each serving utility company should be provided to our office.
4. Our office would defer to the report of the Borough Planner for his review of the Zoning Ordinance requirements for this project.
5. The aesthetics of the proposed buildings to be constructed should be reviewed by the Board.
6. As per the requirements of the Borough Design Standards, sidewalk is required to be installed along the frontage of the property. Middlesex County is proposing to install sidewalk along the entire Bordentown Avenue frontage of the property and a portion of the Jernees Mill Road frontage of the property. The Applicant has indicated that they do not have frontage along Jernees Mill Road so they are not proposing to install additional sidewalk on Jernees Mill Road. This matter should be further discussed with the Board. As a minimum our office would recommend that the Applicant install sidewalk to provide site circulation from all driveways, including the westernmost parking lot adjacent to Warehouse #1.



7. In accordance with the Borough Ordinance, sidewalks shall be provided between parking areas and principal structures, along aisles and driveways, and wherever pedestrian traffic shall occur. The Applicant is requesting a waiver of this requirement.
8. The Applicant's Engineer should design the proposed curb ramps, sidewalks, and crosswalks, to meet the latest ADA requirements. The Applicant's Engineer should provide turning spaces before and after proposed ramps as necessary at the required slopes and the locations of proposed detectable warning surfaces should be clearly indicated. The Applicant's Engineer should certify that all ramps will be ADA compliant.
9. In accordance with the Borough Ordinance, two-way driveways serving industrial uses with over 15% truck traffic volumes shall have a width of forty (40') ft. The plans should be revised to comply with this requirement for all the proposed interior site driveways which will handle truck traffic. The Applicant is requesting a waiver. It should be noted that the site circulation plans submitted show that the current road widths cannot fit two-way circulation when large trucks turn on the center and westernmost drive aisles.
10. The Applicant's Engineer should describe to the Board the need for the additional 343 parking spaces, labeled trailer parking, that are not adjacent to the proposed warehouses, and how they are intended to function including who will be utilizing these parking spaces and the typical duration they will be occupied. This number appears to be excessive and should be reduced in order to provide additional green space on the property. In the past the Borough has experienced problems with trailer parking being leased to tenants not located on the property. In addition to the note that was added to the plans, this should also be a specific condition if this application is approved by the Board.
11. No trash/recycling enclosures are shown on the plan. The Applicant is proposing to utilize trash compactors to comply with this requirement. The Applicant should provide additional information to indicate how garbage and recycling will be stored and removed from the site with the trash compactors.
12. No signage information was included in this submission. The plans state that the signage is to be reviewed under a separate application. Any future signage to be installed will require a future application to be submitted to the Board.
13. Recorded easement documents for all existing easements on the subject site should be submitted to our office for review.
14. Plans and details for the construction of all proposed retaining walls should be prepared by a New Jersey Professional Engineer and submitted to our office.
15. The Environmental Impact Assessment Section 3.2 states that contaminated soils will be capped with building slabs, pavement, or two feet of clean fill, and references Sheets C-301 through C-308. However, the construction plans do not show the limits of contaminated soils, proposed cap limits, cap types, cap details, demarcation layers, or other remedial engineering controls. Revise the plans to provide a dedicated remediation/capping plan showing the contaminated areas, proposed cap limits and type, typical cap details, clean fill requirements, and procedures for handling contaminated soil. The plans shall also identify the Licensed Site Remediation Professional and reference the applicable Deed Notice and Remedial Action Permit requirements. The capping plan shall be coordinated with the proposed grading, landscaping, utilities, and stormwater BMPs. In particular, demonstrate that the six pervious pavement systems



and subsurface infiltration basin do not conflict with areas requiring capping or the applicable Remedial Action Workplan. The applicable Remedial Action Workplan should also be submitted for coordination with the site development plans.

16. All Curb details to be revised to provide 20" depth, as per Borough standard details.
17. The Applicant should confirm that the proposed handrails meet the current Public Right-of-Way Guidelines (PROWAG) requirements for clear space, height, extensions, etc. A construction detail should be provided.
18. Grading comments are as follows:
 - a. On Sheet C-402, the existing grading between proposed contour elevation 16 and the property line along Bordentown Avenue results in a low point, and slopes of under 2%. The Applicant notes on the plan that "Contractor will provide positive pitch to the wetlands." Just a note is unacceptable, the proposed grading should be shown on the plans and in accordance with Borough Design Standards.
 - b. On Sheet C-402, the existing grading in the northeastern portion of the plan sheet between Constructed Wetlands #1B and the existing wetlands within the property contains a low point and slopes of under 2%. The plans should be revised accordingly.
 - c. On Sheet C-402, spot elevation G 19.25 on the ADA ramp is inconsistent with the surrounding elevations and should be revised.
 - d. On Sheet C-403, the existing grading along the northeastern portion of this plan sheet between Constructed Wetlands #1B and behind Constructed Wetlands #1C within the property contains slopes of under 2%. The plans should be revised accordingly.
 - e. On Sheet C-403, curb height is proposed between six (6") and twenty (20") inches reveal. The Applicant should revise the plans to provide six (6") inch curb reveal maximum.
 - f. On Sheet C-405/C-405A, along the southern portion of the driving aisle, curb is proposed to have a two (2') foot reveal next to the proposed concrete sidewalk. The Applicant should revise the plans to separate the curb and retaining wall, or provide a detail for curb with over six (6") reveal for further review.
 - g. On Sheets C-405-407, the grading should be revised within the proposed asphalt areas between the Warehouses and the curb along the Conrail property to provide the minimum required pavement slope of 0.75%. In addition spot elevations should be provided along the proposed curb lines to demonstrate positive drainage and verify compliance with the minimum slope requirements throughout the paved areas.

B. SANITARY SEWER SYSTEM

1. There are two existing 8" sanitary connections that will need to be disconnected at the main prior to demolition if not planned for reuse. This work will be required to be coordinated with the Borough Sewer Department.



C. WATER DISTRIBUTION SYSTEM

1. The Water Distribution Design Report included an estimate of the required fire flows for the proposed improvements. The report showed the Borough's water system is capable of providing the required fire flow, however the report showed only a modest margin for the required flows and recommended an updated test prior to construction. The Applicant should conduct an updated flow test prior to construction and receive approval from the Borough Fire Official as a condition of approval. If it is determined that upgrades are required to the Borough's water system, they should be included as part of this application.
2. The design and adequacy of fire suppression systems, both public and private fire hydrant locations, and the delineation of fire lanes should be subject to the review and approval of the Borough Fire Official.
3. The type of waterline, type of connections, connections to buildings, valves, water meter, and hydrants shall be indicated on the plans.
4. The Applicant's Engineer should provide profiles of the proposed water lines including locations of valves, hydrants, crossings and clearance between sanitary and storm sewers and other underground utilities.
5. The plans do not provide for reuse of the existing water service. This will also require disconnection at the main line prior to demolition if a new service is to be installed. This work will be required to be coordinated with the Borough Water Department.
6. The water main crossings under the railroad tracks shall be subject to review and approval of Conrail.

D. STORM DRAINAGE SYSTEM

1. The Applicant proposes constructing six pervious pavement systems, one small-scale infiltration basin, and green-infrastructure manufactured treatment devices, extended-detention constructed wetland to address stormwater quantity management and water quality.
2. The proposed development will result in the disturbance of more than one acre and is therefore classified as a major development pursuant to N.J.A.C. 7:8. As such, the application is subject to the stormwater management requirements of the New Jersey Stormwater Management Rules, as amended July 17, 2023, and has been reviewed accordingly.
3. The proposed development proposes more than 1 acre of land disturbance and must obtain a General Permit for Construction Activities from the NJDEP. A copy of the permit must be provided.
4. The Major Development Stormwater Summary has been provided in Appendix D of the Stormwater Management Report. However, the form has not been executed, as the name, signature, title, and date fields are blank. In addition, the form contains several inconsistencies with the Stormwater Management Report, including the number of constructed wetland BMPs, use of forebays, constructed wetland drain-down time, groundwater recharge methodology, and reported disturbance and impervious areas. The Major Development Stormwater Summary shall be revised to be consistent with the approved stormwater design and report and shall be fully executed prior to resubmission.



5. Proposed Drainage Area 1L is shown discharging approximately 0.17 acre of impervious area directly to the Jernee Mill Road right-of-way without treatment. Revise the report and drainage area mapping to identify the type of impervious surface within Drainage Area 1L and confirm whether any portion constitutes new or reconstructed regulated motor vehicle surface. If regulated motor vehicle surface is present, provide the required water quality treatment and revise the stormwater design accordingly.
6. As per BMP Manual requirements, a minimum of two (2) soil profile pits should be excavated for each area of the proposed BMP to determine soils suitability and establish seasonal high water in the area of the proposed basin. The Applicant should perform the required testing in accordance with Chapter 12 of the B.M.P. Manual.

It is understood that currently soil testing can not be performed beneath the existing building or within actively utilized site areas. However, the required soil testing has not been completed, and compliance cannot be verified based on the current record. The required testing shall be completed in accordance with Chapters 9.8 and 12 of the BMP Manual when access becomes available and prior to BMP construction. If the results do not support the current design assumptions, the affected BMPs shall be revised or relocated accordingly.

7. Infiltration testing shall be performed within the limits of each proposed infiltration BMP in accordance with Chapter 12 of the NJDEP Stormwater BMP Manual. For infiltration BMPs, the testing shall be conducted below the proposed bottom elevation of the BMP. The design infiltration rate shall be calculated by dividing the tested permeability rate by a factor of safety of 2. The complete infiltration testing report, including field data, calculations, and supporting documentation, shall be submitted for the Borough's review.

It is understood that currently infiltration testing can not be performed beneath the existing building or within actively utilized site areas. However the required testing has not been completed, and compliance cannot be verified based on the current record. All revised infiltration BMP locations shall be supported by soil profile and permeability testing in accordance with Chapter 12 of the BMP Manual when access becomes available and prior to BMP construction. Tables 4.1 and 4.2 shall also be revised to identify, for each infiltration BMP, the applicable test locations, slowest tested permeability rate, design permeability rate after application of the factor of safety, seasonal high groundwater elevation, and resulting drain time. If the results do not support the current design assumptions, the affected infiltration BMPs shall be revised or relocated accordingly.

8. Tables 4.1 and 4.2 in the drainage report have been revised to include BMP area, depth, drainage area ratio, drain time, number of soil investigations performed and required, seasonal high water table elevation, and vertical separation. However, the following items remain unresolved:
 - a. The seasonal high water table remains listed as "TBD" for Porous Pavement Areas #2, #3 and #5 and for the infiltration basin. These values shall be established through the required soil investigations.
 - b. Tables 4.1 and 4.2 do not identify the tested permeability rate or the design permeability rate, after application of the required factor of safety, for the proposed infiltration BMPs. These values shall be added for each BMP.
 - c. The vertical separations reported in Table 4.1 do not reconcile with the BMP storage-bed bottom elevations provided in the O&M Manual. For example, Porous Pavement #1 has a storage-bed bottom elevation of 14.55 and SHWT elevation of 12.10, which provides 2.45 feet of separation, not 1.45 feet as reported. Porous Pavement #6 has a storage-bed bottom elevation of 16.00 and SHWT elevation of 7.00, which provides 9.00 feet of separation, not 9.25 feet.



Revise the BMP summary tables and supporting documents so that the BMP bottom elevations, SHWT elevations, permeability rates, and reported separations are complete and internally consistent.

9. Sheet C-905 includes a site-specific infiltration basin section and provides the stone bottom, chamber bottom and top, stone top, Water Quality, 2-year, 10-year and 100-year water surface elevations, and a 57-hour drain time. However, the seasonal high water table elevation, and finished grade elevation have not been provided and shall be added to the detail. In addition, the plans and drainage report are inconsistent regarding the proposed chamber system. Sheet C-905 identifies an ADS StormTech SC-800 system, while the routing calculations are based on 696 ADS StormTech SC-740 chambers arranged in 12 rows within a 58.50-foot by 416.58-foot by 3.50-foot storage field. Reconcile the chamber model, number of chambers, system dimensions, and resulting storage volume between the plans, calculations, and report.
10. The infiltration basin discharges to a constructed wetland. Although the revised model uses dynamic storage routing, the tailwater condition from Constructed Wetland 1C has not been incorporated into the routing of Infiltration Basin B1. Pond B1 discharges through "Link B1V: Valve," but the model reports a tailwater elevation of 0.00 feet for Pond B1 during all design storms. Pond PP4 appears to be modeled similarly through "Link PP4V."

This does not represent the hydraulic effect of the proposed check valve. Constructed Wetland 1C reaches water surface elevations ranging from approximately 11.67 feet during the 2-year current-adjusted event to 15.76 feet during the 100-year future-adjusted event, while Pond B1 peaks between approximately 10.68 and 12.32 feet. These wetland elevations exceed the basin outlet elevations, including the weir crest at Elevation 11.42 and the orifices at Elevations 10.20 and 10.86. Under these conditions, the check valve would be closed during portions of the storm event and would restrict or prevent discharge from the infiltration basin. Modeling zero tailwater therefore overstates basin outflow and may understate the required storage and peak water surface elevation.

Revise the routing to apply the constructed wetland water surface as dynamic tailwater and model the check valve as closing under reverse head. Recalculate the basin routing and confirm that the infiltration basin provides adequate storage under this condition.

11. The mounding analysis shall be revised to include groundwater mound plots in both the X and Y directions. This shall be completed by switching the X and Y input variables in the model, as applicable.
12. The groundwater mounding analysis assumes an infiltration rate of 0.5 inches per hour. However, the submitted geotechnical report does not include infiltration testing to support this value. The Applicant shall provide site-specific infiltration testing or revise the mounding analysis using a supported design infiltration rate.
13. The groundwater mounding analysis assumes an infiltration period of 8.96 hours. Supporting calculations demonstrating the basis for this infiltration duration shall be included in the Drainage Report.
14. The proposed Extended Detention Constructed Wetland consists of four hydraulically connected cells. The Applicant shall demonstrate that each individual cell complies with the NJDEP BMP



Manual Section 10.4 design criteria, including high marsh depth, low marsh depth, pool depth, and minimum length-to-width ratio requirements.

Table 4.3 and Appendix D include a 24-hour detention evaluation for Constructed Wetland Cell 1D. However, the same evaluation has not been provided for Cells 1A, 1B, and 1C, which remain listed as "N/A." Chapter 10.4, page 16, para 2 of the NJDEP BMP Manual requires the Water Quality Design Storm volume stored in the semi-wet zone to drain to at least 10% of its maximum stored volume within 24 hours. Therefore, the detention-time calculation shall be provided separately for each constructed wetland cell. The calculation for Cell 1D shall also be revised. The worksheet applies the 10% criterion to a stated WQ volume of 61,596 cubic feet, while the routing hydrograph shows a maximum storage of approximately 28,604 cubic feet during the Water Quality Design Storm. The 24-hour criterion shall be based on the maximum volume actually stored in the cell during that storm event. Revise Table 4.3 and Appendix D accordingly for all four wetland cells.

15. The site drainage system discharges to an off-site 48-inch storm sewer. The Applicant shall demonstrate that the downstream pipe has adequate capacity to convey the proposed 100-year design discharge without surcharging or causing flooding within Jernees Mill Road. Supporting hydraulic calculations and downstream system information shall be provided.

Appendix E includes a Hydraflow analysis of the existing downstream storm sewer system. However, the analysis was performed for the 25-year storm rather than the 100-year design discharge requested. The submitted results also indicate that the downstream system is already inadequate during the 25-year event. Runs 5 through 8 convey approximately 40.3 to 40.8 cfs through 30-inch pipes with full-flow capacities of only approximately 31.4 to 31.5 cfs. The reported hydraulic grade line also rises above the rim elevation at upstream structures, indicating surcharging to or above grade. In addition, Run 2 operates at approximately 98 percent of full-flow capacity. The site discharge used in this analysis also does not reconcile with the routed discharge reported for Constructed Wetland 1D. The Hydraflow model uses a site contribution of 40.87 cfs, while Tables 4.5 and 4.6 report 100-year routed discharges of approximately 83.47 cfs for the current-adjusted condition and 113.17 cfs for the future-adjusted condition. Revise the downstream analysis using the actual routed discharge hydrographs from Constructed Wetland 1D for the applicable 10-year and 100-year current- and future-adjusted storm events. Demonstrate that the proposed discharge will not cause surcharging above rim elevations or flooding within Jernee Mill Road, and identify any required off-tract drainage improvements.

16. Several constructed wetland cells include embankments exceeding 5 feet in height and therefore may qualify as Class IV dams under the NJDEP Dam Safety Standards (N.J.A.C. 7:20). The Applicant shall evaluate each embankment for applicability of the Dam Safety Standards and demonstrate that the emergency spillway and overflow design comply with the requirements of N.J.A.C. 7:20. The Borough will require a certification letter from the Engineer of record stating that this wetland berm/wall meets all the design requirements of the appropriate Dam Class as described by NJDEP Dam Safety Standards at NJAC 7:20.
17. Porous Pavement Areas #5 and #6 serve the drive aisles in front of Warehouse #1 and Warehouse #2, respectively. These areas are active truck circulation and maneuvering areas rather than stationary trailer storage. Provide specific justification that Porous Pavement #5 and #6 are suitable for the anticipated truck traffic and loading conditions, including confirmation that the pavement section and underlying storage bed have been structurally designed for the expected vehicle loading. If this cannot be demonstrated, revise the design to relocate these BMPs or use a pavement system appropriate for heavy truck traffic.



18. The NJDEP certification letters for the Manufactured Treatment Devices (MTD) confirm that the High Capacity Kraken Filter is approved for online installation, while the Filterra® HC and Aqua-Ponic™ units are approved for offline installation only. Accordingly, the three Kraken units may be configured online, but the two Filterra units and the Aqua-Ponic unit shall be shown and designed as offline systems. Sheet C-906 currently includes both a "Filterra HC Peak Diversion (FTPD-HC)" detail and a "Filterra Offline HC (FT-HC)" detail without identifying which configuration applies to each proposed unit. The Peak Diversion configuration represents an internal-bypass/online arrangement and is not supported by the Filterra certification letter provided. The MTD Summary Table also does not fully reconcile with the proposed units. Device E-70 is listed with a maximum treatment flow rate of 0.583 cfs and maximum allowable drainage area of 2.11 acres, which correspond to the certified 8-foot by 10.5-foot Peak Diversion unit rather than the 8-foot by 14-foot unit shown on the plans. Device I-80 appears consistent with the certified standard 7-foot by 13-foot configuration. Revise the plans and Stormwater Management Report to identify, for each of the six MTDs, the exact model, vault size, configuration, certified treatment flow rate, and maximum allowable drainage area. Each unit shall be matched to the applicable NJDEP certification table and corresponding construction detail. The final configuration shall be established now rather than deferred to future coordination with the manufacturer.
19. The MTD details on Sheets C-905 and C-906 shall be revised to include site-specific information for each of the six proposed MTDs. The details shall identify the manufacturer and model, design treatment flow, bypass flow, and all applicable installation requirements.
20. The storm drainage system shall be designed in accordance with Borough Code §26-99.3.c.2(e). The following deficiencies were found and require revised storm sewer design and calculations to comply with Borough requirements:
 - a. Runs SD-158, SD-180 and SD-65 exceed their reported full-flow capacities during the 25-year event and shall be upsized.
 - b. Run SD-65 is shown as an 8-inch storm drain, which does not comply with the Borough minimum 15-inch pipe size requirement.
 - c. The system includes downstream reductions in pipe size, including SD-57 (24-inch) discharging to SD-158 (15-inch), and SD-52 (18-inch) discharging to SD-180 (15-inch). These transitions shall be reviewed and revised.
 - d. The calculations do not demonstrate that the hydraulically required pipe diameter has been increased by at least one standard pipe size to account for sediment and debris, as required by Borough Ordinance §26-99.3.c.2(e).
21. The Conduit Outlet Protection Apron chart on Sheet C-902 identifies the outfall pipes as HDPE at multiple locations, including pads A-120, B-10, C-10, D-10, E-10, G-10, G-98, H-10, H-70, H-80, H-130 and I-10. Revise the chart and related details to be consistent with the RCP specified on the Drainage and Utility Plans and in accordance with Borough Code §26-99.3.c.2(h)(i).
22. The Stormwater Management Report and Rail Addendum contain several conflicting drainage area labels, BMP references, table numbers, cross-references, and design values that shall be reconciled. Examples include the incorrect Point of Analysis reference in §4.4.1, inconsistent use of Drainage Area #4/#4A/PDA-4, references to a single "Constructed Wetland #1" where the design and routing use Cells 1A through 1D, incorrect HydroCAD descriptions for E5i and E5p, outdated SESC language in §4.10, inconsistent infiltration-rate references in §4.6.3, and outdated revision/date information in the report and Rail Addendum. The Rail Addendum also contains incorrect table and appendix references, duplicate table numbering, inconsistent drainage area ratios, and continued references to a single constructed wetland system. Most importantly, the emergency spillway results in Rail Addendum Table 3.4 do not agree with base report Table 4.4



for the same four wetland cells. Peak water surface elevations, berm elevations, and discharge rates differ substantially. Identify which analysis governs and revise the plans, Stormwater Management Report, Rail Addendum, and O&M Manual so that one consistent set of design elevations and hydraulic results is provided throughout.

23. The O&MM Manual proof of recording shall be provided to the Borough.
24. The final Operation and Maintenance Manual submitted for approval shall be signed and sealed by the Design Engineer responsible for preparation of the manual.
25. The Operation and Maintenance Manual identifies Hanover Company as the party responsible for maintaining and performing maintenance of the stormwater management facilities. However, the plans identify Gen III Holdings, Inc. as the property owner and HCI DP Land Acquisition LLC as the applicant. Since Hanover Company is neither the owner nor the applicant, provide documentation demonstrating that Hanover Company has accepted responsibility for the long-term maintenance of the stormwater management facilities, consistent with N.J.A.C. 7:8-5.8.
26. The Operation and Maintenance Manual shall be revised to include a BMP design parameter summary table for the constructed wetlands, and underground infiltration basin. For all infiltration BMPs, the table shall also include the tested permeability rate, design infiltration rate, seasonal high water table elevation, BMP bottom elevation, design drain time, and monitoring location.
27. The O&M Manual adds general disposal language for waste generated during BMP maintenance, but the comprehensive site-specific waste management and disposal plan requested has not been provided. The Applicant's position that the plan will be developed once tenants are identified is not acceptable. BMP maintenance waste is the responsibility of the property owner and designated maintenance party, not future tenants.
28. The Environmental Impact Assessment Section 3.2 identifies arsenic, beryllium, and mercury in site soils above applicable NJDEP Soil Remediation Standards, together with asbestos-containing material north and east of the existing building, and states that these conditions will be addressed through capping. The stormwater design nevertheless proposes one small-scale subsurface infiltration basin and six pervious pavement systems totaling approximately 6.5 acres of infiltration area. NJ Stormwater BMP Manual Chapters 9.6 and 9.8 provide that infiltration BMPs on contaminated sites may only be used where the proposed infiltration is not inconsistent with an NJDEP-approved Remedial Action Workplan. Borough Code §26-99.6D.p.4(a) and N.J.A.C. 7:8-5.4(b)3 contain similar restrictions. Plot all proposed infiltration BMPs on the contamination and capping plans and provide written confirmation from the Licensed Site Remediation Professional that each BMP is consistent with the applicable Remedial Action Workplan and does not conflict with areas requiring capping or other remedial controls. Where this cannot be demonstrated, the affected BMP shall be relocated, lined, or otherwise redesigned, and the associated groundwater recharge, water quality, and drain-time analyses revised accordingly.

E. SOIL EROSION AND SEDIMENT CONTROL

1. The Applicant proposes more than 5,000 SF of disturbance and, in accordance with NJ PL Chapter 251, must obtain a Soil Erosion and Sediment Control Certification from the Borough of Sayreville.
2. The proposed development proposes more than 1 acre of land disturbance and must obtain a General Permit for Construction Activities from the NJDEP. A copy of the permit must be provided.



3. Hydrologic Modeling Database forms have been provided for Constructed Wetlands 1A through 1D, Infiltration Basin 1, and Pervious Pavement Areas 1 through 6. However, the "Basin Outlet Structure(s)" section is shown as "N/A" for all four constructed wetland cells, despite the routing calculations including outlet culverts, orifices, and a weir. Complete the outlet structure information for each wetland cell. In addition, the form for Constructed Wetland 1A identifies the basin as "excavated" while also reporting an 8-foot dam height, 10-foot top width, and Class IV dam classification. Reconcile the construction type and dam classification.
4. Provide design calculations for each sediment basin in accordance with the Standards for Soil Erosion and Sediment Control in New Jersey. Since the temporary basins are located within the permanent constructed wetland cells, add a note requiring removal of accumulated sediment, restoration to final grade, and establishment of wetland vegetation only after the contributing drainage areas are permanently stabilized.
5. Revise the Sequence of Construction to address the installation, inspection, maintenance, sediment cleanout, conversion, and removal of the four temporary sediment basins. Since the basins are located within the proposed constructed wetland cells, the sequence shall also require removal of accumulated sediment, restoration of the cells to final grade, and establishment of the permanent wetland vegetation after the contributing drainage areas are permanently stabilized.

F. ENVIRONMENTAL

1. As per the Borough ordinance §26-65.2(a), the Environmental Impact Assessment shall be revised to provide an accurate and complete description of the proposed development, including the extent of site disturbance, proposed facilities, intended uses, and anticipated resident, working, and visitor populations.

At a minimum, the following shall be addressed:

- a. Section 2.2 incorrectly identifies the property as Block 14, Lot 31. The property shall be correctly identified as Block 14, Lot 1.
- b. Section 2.1 identifies the site area as approximately 47.6 acres, while the site plans and Stormwater Management Report identify the property as 46.07 acres. Reconcile the discrepancy and revise the EIA to use the surveyed lot area.
- c. Section 2.2 incorrectly identifies 330 conventional parking spaces and 101 loading docks. Sheet C-301 identifies 304 conventional parking spaces and 97 loading berths. Revise these figures. The project description shall also identify and describe the proposed 343 trailer parking spaces, which constitute a substantial component of the proposed development and affect site circulation, paving, lighting, and stormwater design.
- d. The stated working population of up to 330 employees is not supported by the information provided and appears to correspond to the parking count. Provide the basis for the employment estimate, including anticipated shift structure, employees per 1,000 square feet, tenant or operational assumptions, or other supporting methodology. The visitor and truck-driver populations shall also be estimated separately. The EIA shall incorporate the estimated average daily truck volume identified on Sheet C-301 and the corresponding passenger-vehicle trip generation identified in the Traffic Impact Analysis.
- e. The EIA identifies the two proposed rail spurs as part of the project without noting that they are an alternate design. Revise the EIA to clearly distinguish between the rail and no-rail alternatives, identify which condition is being evaluated, and describe the environmental and stormwater differences between the two alternatives.
- f. The EIA describes improvements only on Block 14, Lot 1. The project description shall also identify the proposed incidental improvements on Block 62.03, Lot 8, including driveway



removals, new or modified driveway construction, and associated disturbance. Any related tree removal, soil disturbance, and erosion control measures shall also be addressed.

- g. The EIA shall clarify that the proposed Jernee Mill Road access is subject to agreements with Conrail and may not constitute permanent site access. The EIA shall address the resulting circulation, truck-routing, and emergency-access implications if access from Jernee Mill Road is restricted or terminated.
- h. Section 2.2 materially mischaracterizes the proposed stormwater management system. No retention ponds are proposed. The system includes four extended-detention standard constructed wetland cells, one small-scale subsurface infiltration basin, six pervious pavement systems, and six manufactured treatment devices. Revise the EIA accordingly.

The EIA shall also accurately describe the proposed receiving drainage system. The record does not establish that the receiving pipe is located on-site or that it is municipal infrastructure. The proposed discharge is reportedly to a 48-inch pipe crossing Jernee Mill Road that could not be located by field survey, with its reported size and invert elevations taken from a 2003 private site plan. The receiving system shall not be characterized as municipal infrastructure unless its location, ownership, condition, and authorization to receive the proposed discharge are established.

- 2. The Environmental Impact Assessment shall be revised to provide a complete description of known or suspected environmental contamination, prior site uses, and the status of any past or present administrative or judicial proceedings involving contamination or remediation, as required by §26-65.2(c)(2).

At a minimum, the following shall be addressed:

- a. Section 3.2 summarizes several environmental investigations, including the September 9, 2020 Whitestone Phase I Environmental Site Assessment, the May 2024 Roux Phase I Environmental Site Assessment and Preliminary Assessment, ground penetrating radar and hazardous materials surveys, AOC/REC investigations, ACM investigations, and the October 22, 2024 Roux Phase II Investigation Summary Letter. These reports have not been provided with the EIA. Provide the referenced environmental reports or otherwise incorporate the relevant supporting documentation into the submission. The EIA shall also provide a summary table identifying detected concentrations of arsenic, beryllium, mercury, and other contaminants of concern by sampling location and depth, together with the applicable NJDEP Soil Remediation Standards. Section 3.2 refers to contaminants being identified “at various locations in Site soil, as listed above,” but no such listing is provided.
- b. The EIA does not identify the status of regulatory proceedings or remediation activities, as specifically required by §26-65.2(c)(2)(c). Provide the applicable NJDEP Program Interest Number and Case Tracking Number, identify the Licensed Site Remediation Professional retained for the property, and summarize the current regulatory status of the remediation. The EIA shall identify whether the Industrial Site Recovery Act applies, the applicable remediation timeframes under N.J.A.C. 7:26C, the status of the Remedial Investigation and Remedial Action, and whether any NJDEP or USEPA notice, directive, order, spill record, enforcement action, or other administrative or judicial proceeding applies to the property. This information is particularly relevant given the documented historic industrial use of the property and the reported presence of asbestos-containing material and metals in site soils.
- c. Section 3.2 states that contaminated soils will be capped as part of the proposed redevelopment through building foundations, pavement, or placement of two feet of clean fill in landscaped areas. However, the referenced site plan sheets do not identify the limits or design of the proposed cap, and no capping plan or remedial design has been provided. Provide the applicable Remedial Action Workplan and a plan identifying the limits of the



proposed engineered cap. The plan shall include typical cap sections, material types and thicknesses, demarcation layer requirements, and the relationship of the cap to proposed buildings, pavement, landscaped areas, utilities, grading, and stormwater facilities. The EIA shall also identify any required institutional and engineering controls, including the applicable Deed Notice and Remedial Action Permit for Soil, together with the associated inspection, maintenance, biennial certification, and permit-holder obligations.

- d. Figure 2 identifies areas of metals exceedances and asbestos-containing material impacts but does not show the proposed development. Revise Figure 2, or provide a separate figure, overlaying the documented contamination areas on the proposed site plan. The figure shall show, at a minimum, proposed buildings, pavement, grading limits, stormwater BMPs, infiltration areas, and proposed cap limits so that the relationship between the remedial conditions and the proposed development can be evaluated. The EIA shall also correct the inconsistent descriptions of Figure 2 within the report.
- e. The proposed stormwater design appears to create a significant potential conflict with the remedial strategy described in Section 3.2. The EIA states that contaminated soils exceeding applicable NJDEP standards will be capped, while the stormwater design includes six pervious pavement systems totaling approximately 6.5 acres and a small-scale subsurface infiltration basin intended to infiltrate stormwater into site soils. Demonstrate that the proposed infiltration BMPs are not located within areas requiring capping and are not inconsistent with any NJDEP-approved Remedial Action Workplan or other applicable remedial restriction. This demonstration shall be based on the contamination/remediation overlay requested above and shall include written confirmation from the Licensed Site Remediation Professional. The evaluation shall address the applicable restrictions of the NJ Stormwater BMP Manual for infiltration BMPs on contaminated or high pollutant loading sites and Borough Code §26-99.6D.p.4. If any proposed infiltration BMP conflicts with the approved or proposed remedial action, the stormwater management design shall be revised accordingly.
- f. Section 4.5 states that there will be no chemical storage or usage within the proposed facilities. This statement is not supported where future tenants and their day-to-day operations have not yet been identified.

Revise the EIA to acknowledge this uncertainty and evaluate the potential implications of future industrial or warehouse tenant operations on stormwater quality and infiltration. Any approval should require that uses tributary to infiltration BMPs comply with the applicable restrictions on high pollutant loading and source-material exposure, that future tenants comply with the applicable Borough performance standards, and that any required NJPDES industrial stormwater permits or authorizations be obtained prior to occupancy or operation.

- 3. The Environmental Impact Assessment shall be revised to provide a complete description and mapping of any unique scenic qualities of the Site and scenic views from the Site, as required by §26-65.2(c)(5).

At a minimum, the following shall be addressed:

- a. Section 3.5 contains an internal inconsistency regarding historic resources. It states that no historic properties were identified on NJ-GeoWeb within one mile of the Site but then states that the Site is adjacent to the Raritan River Railroad Historic District, which reportedly borders the southwest side of the project for approximately 2,800 feet. Reconcile these statements and clearly identify the relationship of the Site to the historic district.
- b. Section 3.5 relies on SHPO correspondence dated July 31, 2025, but the referenced correspondence has not been included in Appendix G or elsewhere in the submission.



Provide the SHPO correspondence relied upon by the EIA so that its findings and recommendations can be independently reviewed.

- c. The Hunter Research Phase IA report recommends that the historic railroad setting, and evolution of the industrial spur be documented to Historic American Engineering Record Level III standards prior to demolition. The EIA does not state whether this recommendation will be implemented and does not identify any corresponding mitigation measure. Confirm whether HAER Level III documentation will be completed. It is recommended that any required documentation be completed and accepted prior to issuance of a demolition permit.

G. TRAFFIC

1. The traffic report shows the Jernee Mill Road delay times, at the intersection with Bordentown Avenue, but it appears that the left turn delay on Jernee Mill Road has increased to 64.0 seconds (No-Build – Level of Service E), 69.7 seconds (Build – Level of Service E), 74.0 seconds (Build with mitigation – Level of Service E). It also appears the Northbound Bordentown Avenue through movement changed to Level of Service E/F. The Applicant should provide testimony on this issue.
2. Site access to the property from Jernees Mill Road will be governed by Agreements with Conrail since their property will be required to be crossed in order to access the site. In the future should access to the site from Jernees Mill Road be restricted due to the termination of lease or any other reason by Conrail, the Applicant shall be required to return to the Planning Board and Middlesex County for amendments to this site plan. At that time, the Applicant shall make any necessary improvements recommended by the Borough Engineer and/or the County. This should also be a specific condition if this application is approved by the Board.
3. The Applicant should advise if there are any truck turning restrictions onsite. The Applicant's Engineer has indicated that heavy trucks will not be using the southern roadway along the warehouses, however there are no signs in place restricting the trucks circulation. Signage for the truck restrictions should be added to the plans in accordance with the "Manual on Uniform Traffic Control Devices for Streets and Highways," published by the U.S. Department of Transportation and adopted by the N.J. Department of Transportation.
4. The Applicant has submitted versions of the site plan that include two proposed rail spurs across parking lot access routes. These two spurs are proposed to tie into the existing Conrail Railroad. The site plan versions that present the proposed delivery railway are missing proposed traffic separations to the truck and car traffic as required in the latest edition of the "Manual on Uniform Traffic Control Devices for Streets and Highways," published by the U.S. Department of Transportation and adopted by the N.J. Department of Transportation. Active and passive traffic control measures to be studied by Applicant's Engineer include but are not limited to roadway markings, flashing signals, railroad crossing bars, regulatory and warning signs, etc. to address safety concerns.

In response the Applicant's Engineer notes that the railroad design is being completed in accordance with the Specific Requirements of Consolidated Rail Corporation for the Design and Construction of Industrial Sidetracks. It is indicated that the physical separation of the railway and vehicular traffic would be infeasible and would prevent future rail-to-truck loading, thus passive safety measures, such as pavement markings, warning signs, and other roadway controls, may be utilized to increase driver awareness of railroad operations. However, passive safety measures will not be sufficient to reduce or eliminate conflicts between train and vehicle traffic. A crash between a train and a car



would be severe and disrupt all traffic operations in the area. The Applicant's Engineer should provide testimony on the future planning of the rail spurs.

5. Site railroad alternative presents unprotected traffic flow alongside active rail line on the site circulation aisle parallel to Jernees Mill Road. Traffic circulation must be protected and horizontal offset provided to separate vehicular and railway traffic. The Applicant's Engineer should revise the proposed site plans to address these concerns.

In response the Applicant's Engineer notes that the proposed rail spur is designed for the flexibility of future tenants and intended to allow for direct train to truck loading which requires the trucks to pull alongside the rail, thus making permanent barriers restrictive. However, passive safety measures will not be sufficient to reduce or eliminate conflicts between train and vehicle traffic. A crash between a train and a car would be severe and disrupt all traffic operations in the area. The Applicant should provide testimony as the operation of loading rail-to-truck.

6. The site railroad alternative proposes 17.5 feet between the rail and the curb, which is insufficient for two way traffic, and no one way signs or do not enter signs are proposed. The Applicant's Engineer should consider eliminating the rail to provide two way traffic. Should the Board wish to consider the proposed rail, the circulation aisle should have two way traffic and should have signed and physical separation between rail traffic and two way traffic.

In response the Applicant's Engineer claims that when a rail spur is not in use, vehicular traffic will be able to utilize the full provided 28 foot roadway width allowing for two-way traffic movement. The Applicant's Engineer indicated that railway protection needs will be assessed when a rail utilizing tenant is found. To maintain full roadway use passive methods including pavement markings, warning signs, and roadway controls will be utilized. However, passive safety measures will not be sufficient to reduce or eliminate conflicts between train and vehicle traffic. A crash between a train and a car would be severe and disrupt all traffic operations in the area. The Applicant's Engineer should provide testimony on this issue.

7. The site railroad alternative proposes two rail lines south of Warehouse 1, which is insufficient for two-way traffic and blocks access to the circulation aisle. The Applicant's Engineer should consider eliminating the rails to provide two-way traffic. Should the Board wish to consider the proposed rail, the circulation aisle should have two-way traffic and should have signed and physical separation between rail traffic and two-way traffic. In addition, there should not be multiple rail lines crossing and occupying a circulation aisle.

The Applicant's Engineer notes that the rail lines will be occupied only intermittently and thus will not routinely impede site circulation. The design and intended timing and operations of the rail spur are intended to maintain full circulation during the vast majority of operating conditions. The Applicant's Engineer claims that the rail spur is an operational component of the facility and has been integrated into the site layout to balance rail service needs with safe and efficient vehicular circulation. However, passive safety measures will not be sufficient to reduce or eliminate conflicts between train and vehicle traffic. A crash between a train and a car would be severe and disrupt all traffic operations in the area. The Applicant's Engineer should provide testimony on this issue.

8. Site railroad alternative presents stop bars and R1-1 stop signs as the sole traffic control methods of traffic control within the site, providing no railroad protection or advanced warning signage for



the active railroad spurs. There exists the possibility a high train/car or train/truck collision potential and a high collision potential for vehicles within the site stopping for train traffic. The plans should be revised to address these concerns.

The Applicant's Engineer claims that the low speed (10 MPH) and low frequency (2 train passes per day) do not require wayside signal systems, a condition fully authorized by the Federal Railroad Administration. The Applicant's Engineer cites the required process to shift the train mandates a direct check, and guidance by the conductor to make sure the tracks are to be clear of obstacles, vehicles, and pedestrians ahead of the train, thus a low hazard threat. The Applicant's Engineer should provide documentation of claimed train frequency data and documents regarding authorization from the Federal Railroad Administration. The Applicant's Engineer should provide testimony on the safety operations of the intended railway.

9. The Applicant provided site circulation plans; however the following issues should be revised:
 - a. Sheet C-01: The design truck appears to drive over the curb of the westernmost parking lot. At the center driveway the design truck appears to encroach on the far curb as it enters the site.
 - b. Sheet C-02: The design truck appears to encroach on the inside curb of the Bordentown Avenue driveway as it enters the site.
 - c. Sheet C-03: The design truck entering the site from the westernmost Jernee Mill Road driveway appears to encroach on the following: the far driveway curb, the curb halfway along the westernmost parking group, two encroachments on the inside curb as it turns right towards the site center, the far curb turning into the center roadway, and the inside curb exiting the site from the center driveway. The design truck entering from the center driveway appears to encroach on the far curb as it crosses the crosswalk near the Bordentown Avenue driveway
 - d. Sheet C-04: The design truck appears to encroach on the outside curb as it exits from the center driveway onto Jernee Mill Road. The design truck appears to encroach upon the inside curb as it turns into the site from Bordentown Avenue.
 - e. Sheet C-05: The design truck entering the site from the center driveway encroaches on the inside curb as it turns right toward the Bordentown Avenue site exit.
10. Fire lanes and striping are subject to the approval of the Fire Subcode Official.
11. It appears that the Applicant's Engineer is proposing a S1-1, school crossing, where a W11-2, pedestrian crossing should be used. The plans should be revised accordingly.