

**Pilot Travel Center WQMP Amendment
RMP Consistency Determination
Public Comments and Responses**

Public comments for the Pilot Travel Center Consistency Determination Review were received from two parties: New Jersey Water Supply and Michele McBride.

Summary of Public Comments

- The public notice attached to the NJDEP review letter notes that the site contains 11.75 acres of which 7.5 acres is to be redeveloped. In fact, the site is virtually 100% built out.
- It is presumed that the wastewater treatment facilities will be located at the southeast corner; soils in that portion of the site are rated as very limited for sewage disposal.
- The site is located in a limestone region of Union Township.
- The wastewater lateral field drains down-slope into the Clinton (East) Wildlife Management Area and ultimately into an unnamed C-1 stream that flows directly into the Spruce Run Reservoir. The reservoir is a source of drinking water and is a major regional recreation facility.
- By increasing the wastewater disposal capacity as proposed, an increase in site activity is imminent.
- The proposed sewage treatment system appears to be located in a Highlands Protection Zone.
- The Description of Project does not match the project described by Pilot representatives at the Union Township Planning Board meeting on September 2, 2008.
- Pilot's site plan indicates that wastewater and stormwater components appear to encompass several acres of additional development outside of the currently paved area, including forested areas.
- The Pilot site plan depicts wastewater and stormwater development which will encroach into forested land, Critical Habitat, important farmland soils in an Agricultural Resource Area, and the Conservation and Conservation Environmentally Constrained Sub-Zone.
- There are apparent inaccuracies within the WQMP Estimated Daily Wastewater Volume calculation of 5,526 gpd provided by Pilot.
- The NJDEP GIS data show the eastern portion of this site to be underlain by Jutland Klippe Sequence, which is a carbonate rock formation. The wastewater and stormwater components proposed for the eastern portion of the site will be sited on this sequence, which the commenter believes is within a carbonate rock area. Further, it is believed that the area drains towards the Carbonate Rock Area shown on the Highlands mapping.
- The NJDEP GIS data shows that the site contains a public non-community wellhead which overlaps three other public non-community wellhead protection areas.

- A Tier 2 contaminated site exists on site. It should be ensured that the additional water that Pilot proposed to pump will not draw contaminants from the aquifer into its own or neighboring residential wells.
- Pilot's Environmental Impact Statement states that 1,500-1,600 patrons per day will visit the center following completion of the proposed development. This increased site activity will increase the potential for a large scale spill of diesel oil or gasoline.
- Pilot's site is a corner lot with frontage on State Route 173 and Charlestown Road, which is a county road. Pilot has applied for a Highway Access Permit which has been under study by the NJDOT for a year.
- This site is part of the Spruce Run Corridor, which was rezoned by Union Township for "Special Commercial" to "Professional Office". This study was done to limit development along this environmentally sensitive corridor. Feels that this project is not in conformance with the Municipal Master Plan.
- With respect to Redevelopment Policy 6J2, it should be noted that Highlands Plan Conformance has not yet begun within Union Township and the adequacy of water, wastewater, transportation capacity, and increased land use intensity have not yet been determined for this site.

Revisions to Pilot Travel Center WQMP Amendment Consistency Determination Review

At the time the Council staff conducted its initial review, the site plan was not available. Since the review template was posted on the Council website (on August 27), staff received the site plan from the applicant. Review of the site plan indicates that in the eastern portion of the property, there are existing stormwater facilities, an existing septic field, and two new proposed septic fields. The proposed septic fields encroach into a forest outside of the Forest Resource Area and a Critical Habitat Area (the proposed septic fields are located within the Existing Community Zone). The project template was updated to reflect the relevant inconsistencies. The review template was updated to indicate that it appears that the proposed septic fields occur in a Tier 2 Wellhead Protection Area for a non-community water supply well.

Review of the site plan indicates that stormwater on the western half of the site is conveyed via on-site stormwater infrastructure to a municipal stormwater facility, while stormwater on the eastern portion of the site is conveyed to an on-site detention pond. The topography shown on the site plan indicates that the eastern portion of the site is draining towards the Carbonate Rock Area. The project template was updated to reflect this finding. A statement was added to the review template that commenters have noted that the site is located within a limestone region of Union Township.