



**Consulting & Municipal  
ENGINEERS**

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March 21, 2025

Evesham Township Planning Board  
984 Tuckerton Road  
Marlton, New Jersey 08053

Attn: Jennifer Newton, Board Secretary

**Re: *Environmental Review  
AutoZone Inc.  
Site Plan Waiver  
775 Route 70 West  
Block 3, Lot 2.01  
Evesham Township, Burlington County, New Jersey  
Application No. P25-01***

Dear Ms. Newton:

CME Associates (CME) has received the application submitted by AutoZone Inc. for the above-referenced site. The site contains approximately 2.45-acres of land located on the northern side of NJSH 70 and the western side of North Cropwell Road. The site is situated within the C-1 (Commercial) and EVCO (Evesham Crossroads Overlay) zoning districts.

Historically, the property contained agricultural land from prior to the 1930s until at least 1970. Available information indicates the property has been fully developed and utilized for commercial/light-industrial purposes since the original portion of the existing building was constructed circa 1983; an addition was constructed circa 1994. The 22,227 SF building is currently occupied by Pep Boys and contains service garage bays, retail space, and storage space. The applicant proposes to implement renovations to divide the building interior into two (2) tenant spaces to be occupied by Pep Boys (12,503 SF) and AutoZone (9,724 SF). The applicant seeks site plan waiver approval from the Township of Evesham.

On behalf of the Township of Evesham, CME has reviewed the following documents:

- Land Development Application P25-01, Checklists, and Checklist Waiver Summary List, received February 19, 2025.
- Survey (1 sheet), prepared by CPL Partnership, LLC, dated November 7, 2024.

**CONSULTING AND MUNICIPAL ENGINEERS LLC**  
NJ CERTIFICATE OF AUTHORIZATION NO. 24GA28359000  
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- Pep Boys Store Alterations (17 sheets), prepared by Vissi Architecture & Design, dated June 25, 2024.
- AutoZone Tenant Fit-Out (27 sheets), prepared by Vissi Architecture & Design, dated June 25, 2024.

### **ENVIRONMENTAL REVIEW**

We have reviewed the application for compliance with the Evesham Township Land Use Code (as it relates to use of the property), including §94 Article II (Environmental Impact Report, including Cultural Resource Survey) and §94 Article IV (Phase I Environmental Assessments).

We offer the following environmental review with recommendations for your consideration.

### **Environmental Impact Report**

Pursuant to §94-13 through §94-17, an Environmental Impact Report with a Cultural Resource Survey is required for each application for development, except for a minor subdivision.

1. No wetlands or water bodies are present on the site. Available mapping from the NJDEP indicates the Cropwell Branch of Pennsauken Creek is located approximately 580 feet northeast of the property. Regulated freshwater wetlands proximate to the stream are mapped approximately 450 feet northeast of the property and 550 feet from the building. The property has been fully developed and utilized for commercial/light-industrial purposes since the 1980s. The application documents indicate the proposed site improvements will not increase impervious coverage at the site. **We have no objection to granting a waiver for this submission requirement. However, the applicant should provide testimony regarding the existing conditions and any proposed changes to the building, pervious/impervious coverage, storage areas, landscaping, and/or stormwater management at the site.**

### **Cultural Resources Survey**

2. Historically, the property contained agricultural land from prior to the 1930s until at least 1970. Available information indicates the property has been fully developed and utilized for commercial/light-industrial purposes since the original portion of the existing building was constructed circa 1983; an addition was constructed circa 1994. Surrounding properties consist of commercial, light industrial, and residential uses. The site and adjacent properties are not listed on the State and National Registers of Historic Places. Additionally, regional mapping indicates potential historic resources are not mapped on or adjacent to the site.



**Based on the property location and site history, it is not anticipated that any significant cultural resources will be identified at the site. We have no objection to granting a waiver for this submission requirement.**

### **Air Quality Study**

Per §160-15 of the Evesham Township Zoning Ordinance, an Air Quality Study is required for any residential development of 100 or more units and any other development involving more than 100 parking spaces.

3. Currently, the site contains 98 parking spaces including four (4) ADA spaces. The application proposes to reconfigure the accessible parking spaces and ramps. The provided plans indicate the reconfiguration will provide one (1) additional ADA space but reduce the total parking spaces by four (4). **An air quality study is not required for the project as proposed. However, the applicant should provide testimony regarding the existing conditions and proposed changes at the site including to asphalt pavement, loading and storage areas, and number/uses of parking spaces.**

### **Environmental Site Assessment**

Pursuant to §94-24 through §94-29, an Environmental Site Assessment is required as part of and as a condition of approval for each application for development.

4. Review of the NJDEP's Data Miner and NJ-GeoWeb websites identified the site in the Hazardous Waste (ID Nos. NJD162327407, NRG000000758), Site Remediation (PI No. 001078), and UST Facilities databases. Available information from the NJDEP indicates two (2) waste oil underground storage tanks (USTs) were removed from the site in the 1990s and associated soil contamination was stockpiled on-site pending off-site disposal. Additional soil contamination related to a separate discharge was reported to the NJDEP in 1995. Additional information/records related to the USTs, reported discharges, and/or remedial activities conducted at the site have not been provided. Further, the application documents and site history indicate the presence of several potential Areas of Concern (AOCs; NJAC 7:26E-1.8) associated with the site. **The applicant should retain a qualified environmental consultant/LSRP to prepare an Environmental Site Assessment for the property in accordance with NJDEP regulations and guidance documents, including a review/evaluation of all previous remedial activities associated with the site. The applicant should provide the Township with copies of all related reports and supporting documentation.**



5. The provided plans indicate that any existing in-ground lifts will be decommissioned and filled with concrete. In addition, the demolition plans indicate a scissor lift and motor located on the northern side of the building (survey plan identifies feature as 'scale') will be removed and the associated pit will be filled with concrete. The demolition plans also indicate a baler located in the northern portion of the building will be removed. **The applicant shall retain a Licensed Site Remediation Professional (LSRP) to oversee all remedial activities associated with the decommissioning of any lifts/equipment in accordance with applicable regulations. The applicant's LSRP shall issue a Response Action Outcome (RAO) for all remedial activities conducted at the site. The applicant shall provide the Township with copies of all related reports and supporting documentation.**
6. The current and proposed future site operations include full-service automotive repair and maintenance, and the storage and use of regulated/hazardous substances. **The applicant should provide testimony and documentation related to the means and methods of hazardous materials management employed at the site. All hazardous substances associated with current/future site operations shall be properly stored, handled, and managed in accordance with applicable regulations. If a hazardous substance will no longer be used/stored at the site, it shall be properly removed and disposed/recycled at regulated facilities in accordance with applicable regulations. The applicant should provide the Township with copies of all related reports and supporting documentation.**
7. Available information indicates scrap/unusable tires are stored within a trash enclosure located on the property boundary with the adjoining Lot 2.02. **The applicant should provide testimony and documentation related to the management, storage, and off-site disposal of tires employed as part of site operations. Storage of tires at the site shall comply with all applicable Federal, State, and Local laws and regulations including, but not limited to, §97-22.2 of the Township Code.**
8. Based on the age of the building, the potential exists that asbestos-containing materials (ACMs) and/or Universal Wastes associated with the structure may be present. The provided renovation plans indicate testing for potential ACM will be conducted prior to renovation activities, but do not reference potential Universal Wastes. **The applicant shall retain a qualified inspector to evaluate the presence/absence of ACM and Universal Wastes associated with the structure prior to any renovation/demolition activities. All hazardous materials associated with the structure shall be properly managed, removed, and disposed/recycled at regulated facilities in accordance with applicable regulations. The applicant should provide the Township with copies of all related reports and supporting documentation.**



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9. **Any soils which will be removed from the site shall be properly characterized in accordance with applicable regulations prior to transporting off-site. The applicant should provide the Township with copies of all related reports and supporting documentation.**
10. **All asphalt, concrete, and/or other debris/wastes generated during the proposed activities shall be properly disposed or recycled at regulated facilities. The applicant should provide the Township with copies of all related reports and supporting documentation.**

CME Associates reserves the right to provide additional comments as more information becomes available. Should you have any questions in this regard, please do not hesitate to contact this office.

Very truly yours,  
**CME Associates**

Behram Turan, P.E., LSRP  
*Senior Vice President*

BT:ers

cc: Kevin Rijs, PP, AICP, Director of Community Development  
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