



**Consulting & Municipal
ENGINEERS**

1 Tower Center
20th Floor
East Brunswick, NJ 08816
732.951.2101 ☎
732.951.2106 📠
www.cmeusa1.com 🌐

October 7, 2025

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

Attn: Jennifer Newton, Board Secretary

**Re: *Environmental Review
Marlton Crossing
Preliminary and Final Major Site Plan
100 Centre Boulevard
Block 24.21, Lot 3
Evesham Township, Burlington County, New Jersey
Application No. P25-11***

Dear Ms. Newton:

CME Associates (CME) has received the Preliminary and Final Major Site Plan application submitted by Marlton Crossing Dev AMS LLC for the above-referenced site. The site encompasses approximately 8.8 acres of land located on the southern side of Old Marlton Pike (CR 600), eastern side of Centre Boulevard, and northern side of Lippincott Drive. The site is situated within the Centre Boulevard Redevelopment Area, and 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. The current commercial development was constructed circa 1987. The applicant proposes to demolish the existing buildings and to construct a 325-unit residential development and associated infrastructure. The applicant seeks Major Site Plan approval from the Township of Evesham.

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

- Land Development Application P25-11 and Checklists, received June 27, 2025.
- Centre Boulevard Redevelopment Plan, prepared by Heyer, Gruel, & Associates, dated January 17, 2025.
- Plan of Survey & Topography (1 sheet), prepared by Taylor Wiseman & Taylor, dated May 1, 2025.



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- Preliminary / Final Site Plans (26 sheets), prepared by Taylor Wiseman & Taylor, dated June 26, 2025, last revised August 28, 2025.
- Amenity Courtyard Schematic Design & Details (6 sheets), prepared by Bohler, LLC, dated May 27, 2025, last revised July 22, 2025.
- Architectural Plans and Elevations (9 sheets), prepared by Minno & Wasko Architects and Planners, dated June 27, 2025.
- Preliminary Earthwork (1 sheet), prepared by Taylor Wiseman & Taylor, dated August 28, 2025.
- Environmental Impact Statement, prepared by DuBois Associates, dated June 25, 2025.
- Stormwater Management Report, prepared by Taylor Wiseman & Taylor, dated June 25, 2025, revised August 27, 2025.
- Stormwater Management Testing, prepared by Geo-Technology Associates, Inc., dated August 27, 2025.
- Traffic Engineering Assessment, prepared by Shropshire Associates LLC, dated June 19, 2025.
- Air Quality Assessment, prepared by Shropshire Associates LLC, dated June 30, 2025.
- Phase 1 Environmental Site Assessment, prepared by William Silveri, LLC, dated May 19, 2025.

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.

The approximately 8.8-acre site has been fully developed for commercial uses since the existing professional and medical office park was constructed circa 1987. The Centre Boulevard Redevelopment Plan designates the site for future residential development. The applicant proposes to demolish the existing commercial buildings and to construct a 325-unit residential development and associated infrastructure. The submitted application documents include an Environmental Impact Statement (EIS) with a desktop review Cultural Resource Survey.



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1. Available information from the NJDEP indicates no streams, wetlands, or other environmentally sensitive areas are mapped at the site or adjoining properties. The EIS states that the project will comply with Burlington County Soil Conservation District (SCD) requirements. The project will utilize existing connections to the public water supply and sanitary sewer systems. The project requires permits/approvals from outside agencies (e.g., SCD, MUA, NJDEP). **The applicant should provide copies of all permits/approvals issued by outside agencies.**
2. As the proposed redevelopment will disturb more one (1) acre, the project is classified as a major development subject to the Stormwater Management Rules (NJAC 7:8). The submitted EIS and Stormwater Management Report indicate the impervious coverage at the site will increase from 61.7% to 64.1% (maximum of 70% is permitted); however, since the regulated motor vehicle surface at the site will decrease, the site is not subject to water quality standards. Additionally, since the previously developed site is within the Metropolitan Planning Areas 1 zone, the project is exempt from groundwater recharge requirements. A subsurface infiltration basin (approx. 7,940 CF of storage) is proposed to achieve compliance with the applicable runoff quantity standards. The Stormwater Management Report states that the system design indicates the proposed project will not increase the volume of stormwater runoff leaving the site and also provides for groundwater recharge. **The applicant should provide testimony regarding the existing conditions and proposed changes to the pervious/impervious coverage, landscaping, and stormwater management at the site.**

Cultural Resources Survey

3. Historically, the property contained agricultural land until at least the 1970s. The site has been fully developed for commercial uses since the existing professional and medical office park was constructed circa 1987. The Centre Boulevard Redevelopment Plan designates the site for future residential development. Surrounding properties consist of residential uses to the south and west, and commercial uses to the north and east. The site and adjacent properties are not listed on the State and National Registers of Historic Places. Regional mapping identifies the adjacent property to the northeast as Uriah Evans House; however, the property is not identified as historically significant. 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.**



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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.

4. The site plans indicate the site currently contains 367 parking spaces; 553 parking spaces are proposed including 83 electric vehicle spaces and 11 ADA-accessible spaces. The proposed parking garage structure will contain 316 spaces and the surface parking areas will contain 237 spaces. **The applicant should provide testimony regarding the existing conditions and proposed changes at the site including pavement, loading zones, storage areas, and the number/uses of parking spaces.**
5. The applicant provided an Air Quality Assessment which includes dispersion modeling for the intersection of Old Marlton Pike and Centre Boulevard. The June 30, 2025 letter states that the dispersion modeling was performed using the USEPA's MOVES3.0 program. The letter also states that the program outputs CO concentrations in grams and the results were converted from grams to ppm (parts per million) by dividing by 1,000. Please review the conversion factor. **The dispersion modeling analysis should be performed using the latest version of the USEPA's program (MOVES5) which includes post-processing tools to properly convert the results/data using appropriate units and conversion methods.**

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.

Review of the NJDEP's DataMiner and NJ- GeoWeb websites identified tenants of the site in the Right-to-Know database (PI Nos. 00000016109 & 00000062675). No further information was available.

6. The applicant submitted a Phase I Environmental Site Assessment (ESA), dated May 19, 2025, which did not identify any Recognized Environmental Conditions (RECs) pursuant to ASTM Standard E1527-21, but did identify the past agricultural use of the site as a Business Environmental Risk (BER) and other non-scope considerations. In addition, review of the Phase I ESA identified several site conditions which constitute Areas of Concern (AOCs) as defined by the NJDEP (NJAC 7:26E-1.8), as follows:
 - a. The Stormwater Management Testing letter indicates that fill materials containing debris were observed within the test pits performed in the northern portion of the site. The fill materials were encountered below the existing topsoil to depths of three (3) to



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six (6) feet below ground surface (bgs). In addition, a layer of buried topsoil was observed in one (1) of the test pits at a depth of two (2) feet bgs. The NJDEP defines historic fill material as non-indigenous material, deposited to raise the topographic elevation of the site, which was contaminated prior to emplacement, and is in no way connected with the operations at the location of emplacement. The application proposes to strip and stockpile the existing topsoil at the site. In addition, the application indicates subsurface soils/fill materials will be excavated/displaced via grading, subsurface utility installations, and construction of foundations, the swimming pool, and the subsurface stormwater basin. The topsoil and excavated soils/fill will be redistributed across site. **This AOC should be investigated in accordance with NJDEP regulations and guidance documents.**

- b. Historic aerial photography indicates the site contained agricultural fields from prior to the 1930s until at least the 1970s. The potential exists that soils at the site have been impacted by historically applied pesticides. **This AOC should be addressed in accordance with NJDEP regulations and guidance documents.**
- c. The Phase I ESA states that based on the age and non-residential use of the buildings at the site, the potential exists that asbestos-containing materials (ACMs) and lead-based paint (LBP) may be present. Suspect ACMs include, but are not limited to, roofing shingles, ceiling tiles, and vinyl flooring tiles. CME concurs with these findings. In addition, PCB-containing materials associated with the structures may be present. **The applicant shall retain a qualified inspector to evaluate the presence/absence of ACM, LBP, and Universal Wastes associated with the structures prior to any demolition and/or renovation activities. All hazardous materials identified at the site shall be properly managed, removed, and disposed/recycled at regulated facilities in accordance with applicable regulations. The applicant should provide copies of all related reports and supporting documentation.**

The applicant should retain a qualified environmental consultant to address the AOCs associated with the site in accordance with NJDEP regulations and guidance documents. The applicant should provide copies of all related reports, records, and supporting documentation.

- 7. Recreational areas for children are required. The site plans identify a tot-lot within the northern courtyard and an indoor space adjacently southeast of the tot-lot. **The applicant should provide documentation/testimony regarding the surface materials/construction to be employed including construction details. In addition, documentation/testimony should be provided regarding whether a childcare center will be established at the site.**



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8. The application documents do not indicate the number, location(s), and/or type(s) of elevators to be installed. Boreholes drilled for the installation of elevator shafts are classified as Category 7 wells (NJAC 7:9D-2.1) which must be installed/constructed by a New Jersey licensed well driller. **The applicant should provide documentation/testimony regarding these concerns.**
9. The Preliminary Earthwork plan indicates the redevelopment project will require the importation of approximately 4,038 CY of fill materials. All imported fill materials should meet the NJDEP's definition of clean fill (NJAC 7:26E-1.8). **The applicant should provide copies of all related records, reports, and supporting documentation.**
10. **Any soils which will be removed from the site shall be properly sampled/characterized in accordance with applicable regulations prior to transporting off-site. The applicant should provide copies of all related reports, records, and supporting documentation.**
11. **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 copies of all related reports, records, 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
Ronald Cucchiario, Esq., Board Solicitor
Michelle Taylor, PP, AICP, Board Planner
Rakesh Darji, PE, PP, CME, Board Engineer
Stacey Arcari, PE, PP, CME, PTOE, Board Traffic Engineer
Marlton Crossing Dev AMS LLC – Applicant (amitnick@amsacquisitions.com)
Peter M. Flannery, Esq. – Applicant's Attorney (pflannery@bisgaierhoff.com)
Vladislav Koldomasov, PE – Applicant's Engineer (koldomasov@taylorwiseman.com)
Jack L. Raker, RA – Applicant's Architect (jraker@minnowasko.com)
Nathan B. Mosley, PE, CME – Applicant's Traffic Engineer (nmosley@sallc.org)