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Wetlands, Water, Soil, & Regulation

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Date: February 3, 2020

To: Michael Robbins
From: John H. Crow, Ph.D. 
Re: 2700 Hamilton Blvd., South Plainfield, NJ
Township's Memo

As you know, I inspected the site last week and am responding to the Najarian/Robert Bucco Jr. letter of January 24, 2020, pertaining to environmental issues listed in the Engineering Review by item.

Item E.1.2.a-c. pertaining to vegetation and wetlands

Vegetation was removed as part of the implementation of the approved NJDEP wetland fill permit, Soil Conservation District approval, and municipal approval over the area depicted in those plans.

The current plan is accurate with respect to wetlands. There are no wetlands on site. A man-made ditch to the west and just off the pavement is not regulated wetland and was present and reviewed at the time the NJDEP Letter of Interpretation (LOI) was obtained in 2009. The feature is strictly a ditch feature that carries water from the existing parking lot and is not a regulated feature. Note that the obvious area with the Giant Reed Grass (*Phragmites australis*), a noxious invasive, grows in part of the stone fill within the ditch where ditch cleaning is needed and usually removed by routine maintenance. Such an area is not regulated wetland.

Some other areas that may have caught the eye of the reviewer include construction areas that are not yet finished with respect to grading and materials. Where drainage is directed, some wetland plants may grow there and will be removed when the grading is complete and the drainage maintained. These areas are definitely not regulated by NJDEP as they are temporary, do not meet the three parameters required, and are very obviously present because of the incompleteness of the construction.

There is absolutely no reason to file for another Letter of Interpretation.

Item E.5.1. pertaining to soils in the wetland area

At the time of the LOI in 2009 soils within the wetland were studied and were no different in general character from adjacent areas except that the wetland area in question was slightly lower in elevation. From our records, it was evident at the time that all the soils in the subject area were Ellington-Urban Land (EkmB) and consisted of regraded native material across the entire site, including the former wetland area, with shallow bedrock below (some of the shallow rock was also part of the regraded material). There is no reason to believe that the filled area, covered with brick and concrete, will be less supportive of structures or surfaces for sport than any other area within the development area.

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