



September 12, 2025

Elk Township Planning/Zoning Board  
680 Whig Lane  
Monroeville, NJ 08343

Attn: Ann Marie Weitzel, Board Secretary

Re: Country Roads Realty, LLC  
Preliminary and Final Major Site Plan with Bulk Variance  
Block 44, Lot 4  
730 Buck Road  
RE – Rural Environmental Zoning District  
Review #2 – Completeness & Technical  
Bach Associates Proj. # ET2025-1

Dear Chairman Afflerbach and Members of the Board:

The application is for Preliminary and Final Major Site Plan with Bulk Variance approval for a Class I Cannabis Cultivation Establishment, which includes a 15,000 square foot headhouse building, three (3) sealed greenhouse structures with associated air circulation and odor mitigation equipment totaling approximately 227,725 square feet, conversion of existing 2,400 square foot metal garage to an auxiliary drying building, and conversion of existing 1,750 square foot dwelling into office space. The applicant is also proposing driveway, circulation, and parking lot improvements, which include gated entry access, three (3) truck loading stalls, 48 parking spaces, three (3) soil storage areas, landscape buffers, security fencing, stormwater, well and septic improvements.

The ±83 acre existing property is located on the westerly side of Buck Road (County Route 553) between Vivian Lane and Elk Road (County Route 538). The site currently contains two (2) existing one story buildings, a one-story metal garage, several ponds, wetland areas, a 30 feet wide communications access and multiple easements. The site is located in the Rural Environmental Zone and within the Cannabis Establishment Overlay Zone.

The following items were submitted with the initial application and addressed in our letter dated January 13, 2025:

1. Cover letter prepared by Archer & Greiner, PC, dated December 27, 2024.
2. Elk Township Land Development application, received December 27, 2024.
3. Application Addendum.
4. Escrow agreement.

5. Affidavit of ownership and consent.
6. Corporate Disclosure Information Statement.
7. Land Development Checklist.
8. Security Plan.
9. Freshwater Wetlands Letter of Interpretation Request prepared by DuBois & Associates, dated April 9, 2024.
10. Geotechnical Engineering Report prepared by Pennoni Associates, Inc., dated November 1, 2024.
11. Stormwater Management Memo prepared by Pennoni Associates, Inc., dated December 13, 2024.
12. Freshwater Wetland Delineation Report, prepared by DuBois & Associates, dated March 20, 2024.
13. Phase I Environmental Site Assessment by DuBois & Associates, dated April 9, 2024.
14. Survey entitled “Elk Cannabis, 730 Buck Road, Township of Elk, Gloucester County, New Jersey” prepared by Pennoni Associates, Inc., dated 10-03-22, revised 10-14-24 (6 sheets).
15. Architectural plans entitled “ATH-NJ Headhouse” prepared by Premiere Architecture, Inc.:

<u>Sheet</u>	<u>Title</u>	<u>Date/Last Revision</u>
A102	Floor Plan	12-13-24 / None
A201	North & East Elevation	12-13-24 / None
A202	South & West Elevation	12-13-24 / None

16. Plans entitled “Elk Cannabis Cultivation Facility, Preliminary Major Site Plan, 730 Buck Road, Elk Township, Gloucester County, New Jersey ” prepared by Pennoni Associates, Inc.:

<u>Sheet</u>	<u>Title</u>	<u>Date/Last Revision</u>
1	Cover Sheet	12-13-24 / None
2	Information Sheet	12-13-24 / None

3	Overall Site Plan	12-13-24 / None
4	Demolition Plan	12-13-24 / None
5	Site Plan	12-13-24 / None
6	Site Plan – Phase 2	12-13-24 / None
7	Grading Plan	12-13-24 / None
8	Landscaping Plan	12-13-24 / None
9	Landscaping Details and Notes	12-13-24 / None
10	Construction Details	12-13-24 / None
11	Soil Erosion & Sediment Control Plan	12-13-24 / None
12	Soil Erosion & Sediment Control Notes & Details	12-13-24 / None

The application was deemed incomplete at a Planning Board meeting on January 15, 2025. The applicant withdrew their application on January 27, 2025.

The Following items were submitted by the applicant on April 9, 2025:

1. Cover letter prepared by Archer & Greiner, PC, dated April 7, 2025.
2. Amended Elk Township Land Development application.
3. Application Addendum.
4. Escrow agreement.
5. Affidavit of ownership and consent.
6. Corporate Disclosure Information Statement.
7. Tax Certification.
8. Land Development Checklist.
9. Survey entitled “Elk Cannabis, 730 Buck Road, Township of Elk, Gloucester County, New Jersey” prepared by Pennoni Associates, Inc., dated 10-03-22, revised 10-14-24 (6 sheets).
10. Plans entitled “Elk Cannabis Cultivation Facility, Preliminary/Final Site Plans, Gloucester County, New Jersey, Block: 44, Lot: 4” prepared by Pennoni Associates, Inc.:

<u>Sheet</u>	<u>Title</u>	<u>Date/Last Revision</u>
1	Cover Sheet	3-12-25 / None
2	Information Sheet	3-12-25 / None

3	Existing Site Plan	3-12-25 / None
4	Demolition Plan	3-12-25 / None
5	Overall Site Plan	3-12-25 / None
6	Site Plan – 1	3-12-25 / None
7	Site Plan – 2	3-12-25 / None
8	Site Plan – 3	3-12-25 / None
9	Vehicle Maneuvering Plan	3-12-25 / None
10	Overall Site Grading Plan	3-12-25 / None
11	Site Grading Plan - 1	3-12-25 / None
12	Site Grading Plan - 2	3-12-25 / None
13	Site Grading Plan - 3	3-12-25 / None
14	Overall Site Drainage Plan	3-12-25 / None
15	Site Drainage Plan - 1	3-12-25 / None
16	Site Drainage Plan - 2	3-12-25 / None
17	Site Drainage Plan - 3	3-12-25 / None
18	Overall Site Utility Plan	3-12-25 / None
19	Site Utility Plan - 1	3-12-25 / None
20	Site Utility Plan - 2	3-12-25 / None
21	Site Utility Plan - 3	3-12-25 / None
22	Septic Design Plan	3-12-25 / None
23	Septic Design Details	3-12-25 / None
24	Overall Site Landscape Plan	3-12-25 / None
25	Site Landscape Plan - 1	3-12-25 / None
26	Site Landscape Plan - 2	3-12-25 / None
27	Site Landscape Plan - 3	3-12-25 / None
28	Sight Triangles	3-12-25 / None
29	Overall Site Lighting Plan	3-12-25 / None
30	Site Lighting Plan - 1	3-12-25 / None
31	Site Lighting Plan - 2	3-12-25 / None
32	Site Lighting Plan - 3	3-12-25 / None
33	Storm Profiles	3-12-25 / None
34	Construction Details	3-12-25 / None
35	Storm Sewer Details	3-12-25 / None
36	Utility Details	3-12-25 / None
37	Landscape Details and Notes	3-12-25 / None
38	Overall Soil Erosion and Sediment Control Plan	3-12-25 / None
39	Soil Erosion and Sediment Control Plan - 1	3-12-25 / None
40	Soil Erosion and Sediment Control Plan - 2	3-12-25 / None
41	Soil Erosion and Sediment Control Plan - 3	3-12-25 / None
42	Soil Erosion and Sediment Control Notes	3-12-25 / None
43	Site Soil Erosion and Sediment Control Details	3-12-25 / None

11. Architectural plans entitled “Country Roads Realty Headhouse” prepared by Premiere Architecture, Inc.:

<u>Sheet</u>	<u>Title</u>	<u>Date/Last Revision</u>
G101	Cover	3-28-25 / None
A201	North & East Elevation	3-28-25 / None
A202	South & West Elevation	3-28-25 / None
M0.1	Mechanical Details & Notes	3-28-25 / None
M1.1	Mechanical Plan	3-28-25 / None

12. Traffic Impact Study prepared by Pennoni Associates, Inc, dated March 7, 2025.
13. Geotechnical Engineering Report prepared by Pennoni Associates, Inc., dated November 1, 2024.
14. Infiltration Testing Summary Report prepared by Pennoni Associates, Inc., dated January 24, 2025.
15. Stormwater Management Report prepared by Pennoni Associates, Inc., dated March 27, 2025.
16. Stormwater Maintenance Report prepared by Pennoni Associates, Inc., dated March 27, 2025.
17. Freshwater Wetland Delineation Report, prepared by DuBois & Associates, dated March 20, 2024.
18. Freshwater Wetlands Letter of Interpretation Request prepared by DuBois & Associates, dated April 9, 2024.
19. Environmental Impact Statement prepared by Pennoni Associates, Inc., undated.
20. Phase I Environmental Site Assessment by DuBois & Associates, dated June 15, 2022.
21. Title Insurance Documents prepared by Fidelity National Title Insurance Company, dated July 23, 2024.
22. Security Plan.
23. Cannabusters Brochure and Safety Data Sheet.

24. Budgetary Estimate Proposal prepared by BioTherm, dated February 7, 2025.
25. Greenhouse Proposal for ATH in New Jersey prepared by BFG Supply Co., dated February 12, 2025.
26. Lighting Spec Sheets prepared by Lithonia Lighting, dated January 28, 2025.

The following items were submitted on June 17, 2025:

1. Cover letter addressed to Township Clerk prepared by Archer & Greiner, PC, dated June 12, 2025.
2. Application for Elk Township Cannabis License (Class I and Class II). Marked confidential.
3. Application for Elk Township Cannabis License (Class I and Class II) addendum. Marked confidential.
4. Application Addendum Item #12B
5. Application Addendum Item #12C
6. Application Addendum Item #12E
7. Application Addendum Item #12F
8. Application Addendum Item #12G
9. Affidavit of Applicant.
10. Application Addendum Item #15 – Financial Information.
11. Business Registration – Confirmation of Filing for ATH CANNA LLC, dated June 10, 2025. Marked confidential.
12. Internal Revenue Service Employer Identification Number assignment letter dated June 4, 2025.
13. New Jersey Department of the Treasury Division of Revenue and Enterprise Services Certificate of Formation for ATG Canna LLC. Marked confidential.
14. Operating Agreement of ATH Canna, LLC. Marked confidential.

15. New Jersey Cannabis Regulatory Commission application submission confirmation for ATH Canna for Class 1 Cultivator dated June 10, 2025. Marked confidential.
16. New Jersey Cannabis Regulatory Commission application submission confirmation for ATH Canna for Class 2 Manufacturer dated June 10, 2025. Marked confidential.
17. Binding letter of intent between Country Roads Realty, LLC and ATH Canna, LLC dated June 10, 2025.
18. Email confirmation from Elk Township Zoning that the subject property is within the Cannabis Establishment Overlay Zone, dated June 9, 2025.
19. Letter addressed to New Jersey CRC prepared by Ernest Staton, CPA, undated.
20. Copies of applicant licenses. Marked confidential.
21. New Jersey State Police letter confirming fingerprint search dated May 28, 2024.
22. New Jersey State Police letter confirming fingerprint search dated May 29, 2024.

It is noted that Township adopted Resolution No. R-254-2025 RESOLUTION OF THE MAYOR AND COMMITTEE OF THE TOWNSHIP OF ELK SUPPORTING AND APPROVING APPLICATION FOR CLASS 1 CANNABIS CULTIVATION LICENSE FOR ATH CANNA, LLC and Resolution No. R-155-2025 RESOLUTION OF THE MAYOR AND COMMITTEE OF THE TOWNSHIP OF ELK SUPPORTING AND APPROVING APPLICATION FOR CLASS 2 CANNABIS MANUFACTURERS LICENSE FOR ATH CANNA, LLC on August 19, 2025.

### **COMPLETENESS:**

The applicant has requested waivers from the following checklist items:

- #8 requires copies of applications to and certification of approvals from all outside agencies with jurisdiction over the proposal (Gloucester County, NJDEP, NJDOT, Soil Conservation District, etc.) ***Waiver recommended for completeness only.***
- #14 requires certification from the tax collector that all taxes are paid to date. ***Waiver not recommended.***
- #37 requires drafts of proposed protective covenants, deed restrictions or casements for review by the Land Use Board and its professional staff. ***Waiver recommended for completeness only.***

- #38 requires Photographs of the site taken from the opposite side of the street and to show any unusual physical aspects of the site. And for a variance, any other vantage that would be instructive. ***Waiver recommended for completeness only.***
- #48 requires Distance along rights-of-way lines of existing streets to the nearest intersection with other streets. ***Our office has no objection to a waiver being granted for this item.***
- #49 requires the location of all existing trees or tree masses, indicating general sizes and species of trees in accordance with Township Ordinances. ***Waiver recommended for completeness only. The applicant shall comply with the Township's Tree Replacement Ordinance.***
- #62 requires Location of fire hydrants and streetlights. ***Our office has no objection to a waiver being granted for this item.***
- #68 requires floor plan and front elevation of all proposed principal buildings and contemplated accessory buildings and structures, and any elevations in public view. ***Waiver recommended for completeness only. The applicant has provided architectural plans for the "headhouse building" only. Plans shall be provided for all proposed and converted structures including greenhouses.***
- #73 requires A letter of interpretation from the New Jersey Department of Environmental Protection. ***Waiver for completeness only. The supporting documents referenced in the DuBois cover letter and associated report shall also be provided to the Township.***
- #77 requires the size, type, copy and location of all proposed signs. ***Waiver recommended for completeness only. Testimony shall be provided regarding signage.***

The applicant did not request waivers but has not provided the following checklist items:

- #36 requires a copy of any protective covenants, easements and restrictions of record. Include current Title Policy. ***Waiver recommended for completeness only.***
- #63 requires Cross sections and center-line profiles of all existing or proposed streets or water courses with dimensions at 50-foot intervals. ***Our office has no objection to a waiver being granted for this item.***
- #71 requires the location, size and materials of containers and enclosures for solid waste and recycling, and a detail of same. ***Waiver recommended for completeness only. The applicant shall provide.***

- #81 requires Traffic control and directional signage plan (elevation, size, color, etc) in accordance with section 96-64. **Waiver recommended for completeness only.**
- #83 requires existing and proposed curb openings, with width at curb line and property line. **Waiver recommended for completeness only.**

**OWNER/APPLICANT:**

Country Roads Realty, LLC  
219 North Vineyard Boulevard  
Collingswood, NJ 08108

**CO-OWNER:**

Wigmore Investments, LLC  
1416 2<sup>nd</sup> Street  
Delanco, NJ 08075

**CANNABIS ESTABLISHMENT OVERLAY ZONE GENERAL REQUIREMENTS:**

1. All cannabis establishments located within the Township shall meet all requirements for licensure and hold the appropriate license issued by the Cannabis Regulatory Commission, Department of Treasury, State of New Jersey. ***The applicant has submitted an application addendum stating, “No cannabis-related activity will take place on the Property unless and until approval to commence operations is received from both the Township of Elk and the New Jersey Cannabis Regulatory Commission.” The applicant has provided proof of submission of an Elk Township Cannabis License Application and has submitted applications to the New Jersey Cannabis Regulatory Commission for Class 1 Cultivator and Class 2 Manufacturer licenses.***
2. All cannabis establishment operations shall be conducted within a building. No operations shall be conducted outside. ***The applicant has submitted an application addendum stating “All cannabis operations at the Property are proposed to be conducted within a building. No operations will be conducted outside.”***

3. No cannabis establishment shall permit on-site consumption of cannabis or cannabis related products including no on-site sales and consumption of alcohol or tobacco products. ***The applicant has submitted an application addendum stating, "The cannabis operation will not be open to the public, no consumption of cannabis products will be permitted, and no sales or consumption of alcohol or tobacco products is proposed."***
4. No outside storage of any cannabis, cannabis products or cannabis related materials shall be permitted. ***The applicant has submitted an application addendum stating, "The outside storage of cannabis, cannabis products, or cannabis materials is not proposed and will not be proposed."***
5. For each cannabis establishment located within the Township, a security plan to be approved by Elk Township Police Department shall be provided to demonstrate how the facility will maintain effective security and control of the operations. The plan should include the following but not limited to:
  - a. Type of security systems to be installed.
  - b. Installation, operation and maintenance of security camera coverings all interior and exterior parking lots, loading areas and other such areas of the establishments.
  - c. Tracking and record keeping of products and materials.
  - d. Type of lighting provided in and around the establishments.
  - e. Location on site security team and armed guard on premises.

***The applicant has submitted an application addendum stating "A security plan providing the applicable detail has been provided to the Elk Township Police Department for review. The Applicant will continue to coordinate with the Elk Township Police Department to address any questions or concerns that arise." To-date Elk Township Police Department approval has not been provided to our office. The applicant shall provide testimony regarding the status of Police review. Waiver not recommended.***

6. Building permit application requirements. Any application for a building permit for a cannabis establishment use to be located in this district shall be accompanied by:
  - a. A plot or site plan of the gross property, showing the location of all present and proposed buildings, drives, parking lots, waste disposal facilities, screening fences or walls and other constructional features on the lot as well as streets,

alleys, highways, streams and other topographical features inside and outside of the lot and within 200 feet of any lot line.

- b. Plans and specifications bearing the seal of a registered architect or engineer.
- c. A description of the operations proposed, in sufficient detail to indicate the effects of those operations in producing traffic congestion, noise, glare, air pollution, water pollution, fire hazards or safety hazards or the emission of any potentially harmful or obnoxious matter or radiation.
- d. Engineering and architectural plans for the treatment and disposal of sewage and industrial waste, tailings or unusable by-products.
- e. Engineering and architectural plans for the handling of any excess traffic congestion, noise, glare, air pollution, water pollution, fire hazard or harmful or obnoxious matter or radiation.
- f. Designation of the fuel to be used and any necessary architectural and engineering plans for controlling smoke and/or odor.
- g. Security plan approved by the Elk Township Police Department.
- h. Evidence of appropriate license issued by the Cannabis Regulatory Commission, Department of Treasury, State of New Jersey.

***The applicant has submitted an application addendum stating “The Applicant’s building permit applications will contain all applicable detail outlined within this Section. Building permit application will not be submitted unless the Applicant received approval from the Elk Township Combined Planning and Zoning Board.”***

7. Fire and explosive hazards. All activities and all storage of flammable and explosive materials at any point shall be provided with adequate safety devices against the hazards of fire and explosion, and adequate fire-suppression equipment shall be installed and maintained in an operable condition in accordance with the regulations of the Fire Marshal's Office, Construction Official and the regulations of applicable local, county, state, and federal agencies. ***The applicant has submitted an application addendum stating “The applicant does not propose to store any explosive or hazardous materials as part of this operation. All required fire suppression equipment shall be installed as required by code.”***

8. Electrical disturbance. No activity shall be permitted which results in an electrical disturbance adversely affecting the operation of any equipment beyond the building in which the disturbance is created. ***The applicant has submitted an application addendum stating, "The Applicant's operation and associated equipment will not create any electrical disturbances which could adversely affect equipment beyond the buildings in which they are located."***
9. Smoke, ash, dust, fume, vapor, gases and other forms of air pollution. There shall be no emission at any point from any chimney or otherwise which can cause damage to human health, to animals or vegetation, or to other forms of property, or which will cause any excessive soiling at any point. ***The applicant has submitted an application addendum stating, "No emissions associated with the Applicant's operation will cause damage to human health, to animals or vegetation, or to other forms of property, or which will cause any excessive soiling at any point."***
10. Liquid and solid wastes. There shall be no discharge at any point, into any private or public sewerage system, or into any stream, or into the ground of any materials in such a way, or of such temperature, as to contaminate or otherwise cause the emission of hazardous materials except as regulated by applicable local, state, or federal agencies. ***The applicant has submitted an application addendum stating "No contaminated liquid will result from the Applicant's operation."***
11. No activity or use shall produce a sound pressure level on adjacent property in excess of the level permitted by the applicable laws of the State of New Jersey, and regulations adopted by the NJDEP, and as currently enforced by the Gloucester County Health Department or any other duly authorized enforcement agency. ***The applicant has submitted an application addendum stating, "The Applicant's operation does not require the use of heavy machinery and will therefore not produce any sound emissions in excess of applicable local, County, or State limitations."***
12. Vibration. No activity or operation shall produce at any point along the lot line continuous earth home vibrations greater than the maximum displacement as permitted. ***The applicant has submitted an application addendum stating "The Applicant's operation does not require the use of heavy machinery and will therefore not produce any vibrations in excess of the above limitations."***
13. Glare. No activity or use shall produce a strong, dazzling light or reflection of same beyond its lot lines. Exterior lighting shall be shielded, buffered and directed so that glare, direct light, or reflection will not be a nuisance to adjoining properties, dwellings, streets, districts, or from adjacent buildings within an industrial park. In no event shall a lighting intensity greater than 0.125 footcandle, measured at grade, be permitted beyond the subject lot lines. ***The applicant has submitted an application***

***addendum stating “The Applicant’s operation will not produce any glare, or light emissions that will emit a light intensity greater than 0.125 footcandles beyond the subject property line. Exterior lighting will be shielded, buffered and directed so that glare, direct light, or reflection will not be a nuisance to adjoining properties, dwellings, streets, districts, or adjacent buildings.”***

14. Odor. No operation shall release materials capable of becoming odorous, either by bacterial decomposition or chemical reaction, that cause or will cause odorous matter or vapor to be generated so as to be readily discernible without instruments from any point along the boundaries of each lot. **The applicant has submitted an application addendum stating, “The Applicant has enclosed specifications for its proposed odor mitigation equipment, which will be supplemented by testimony to establish that odor from the operation will not be discernible along the property boundary.” However all submitted information is generic in nature and also is not provided for all buildings where cannabis operations are proposed. Detailed odor control provisions for all cannabis operations shall be provided.**

**ZONING AND LAND USE:**

In accordance with section 96-78.2 the proposed use of Class 1 Cannabis Cultivation Facility is permitted in the Cannabis Establishment Overlay Zone (CE).

**CE Zone Bulk Standards**

The CE bulk standards are listed below and are provided for the Board’s consideration.

Section	Required	Existing	Proposed	Compliance
96-78.2E.(2)(a) Minimum Lot Area	5 acres	83.62 acres***	83.62 acres***	Complies
96-78.2E.(2)(b) Min Lot Frontage (Buck Road)	200 ft	781.52 ft	781.52 ft	Complies
96-78.2E.(2)(b) Min Lot Frontage (Vivian Lane)	200 ft	>200 ft	1,165.09 ft	Complies
96-78.2E.(2)(c) Minimum Lot Depth	200 ft	>200 ft	>200 ft	Complies
96-78.2E.(2)(d) Maximum Building Coverage	20%	0.17%	6.77%	Complies
96-78.2E.(2)(e) Front Yard (Buck Road) Setback	100 ft	>100 ft	>100 ft	Complies
96-78.2E.(2)(f) Side (South of Lot 5) Setback	50 ft	>50 ft	>50 ft	Complies

Section	Required	Existing	Proposed	Compliance
96-78.2E.(2)(f) Side (West of Lot 5) Setback	50 ft	213.6 ft	117.11 ft	Complies
96-78.2E.(2)(f) Side (Adj to Lot 6) Setback	50 ft	4.4 ft*	<b>0 ft **</b>	<b>Variance</b>
96-78.2E.(2)(g) Rear Yard (Adj. to Block 42 Lot 13) Setback	75 ft	>75 ft	>75 ft	Complies
96-78.2E.(2)(g) Rear Yard (Adj. to Lot 16) Setback	75 ft	>75 ft	239.93 ft	Complies
96-78.2E.(2)(h) Front Yard (Vivian Lane) Setback	75 ft	>75 ft	>75 ft	Complies
96-78.2E.(2)(i) [1] Maximum Principle Building Height	40 ft	<40 ft	<40 ft	Complies
96-78.2E.(2)(i)[2] Maximum Accessory Building Height	25	<25 ft	<25 ft	Complies
96-78.2(E)(2)(j) Perimeter Buffer	100 ft	NA	<b>90.3 ft **</b>	<b>Variance</b>

\*Existing condition  
\*\* Variance required

\*\*\* It shall be noted that the zoning chart lists the existing area as 83.62 acres, however, the survey and application note the site as being 79.491 acres. Clarification shall be provided.

Per §96-5, each corner lot shall have two front yards, a minimum of one (1) side yard, and one (1) rear yard. Since the property is an irregular shape with 7 sides, our office has determined the lot line designations listed in the above chart.

**VARIANCES:**

**Bulk Variances:**

- Side Yard Setback §96-78.2E.(2)(f) (Adjacent to Lot 6) – The applicant is proposing a side yard setback of 0 feet where a minimum of 50 feet is required. **A variance is required.**
- Side Yard Setback §96-78.2E.(2)(j) (Adjacent to Lot 6) – The applicant is proposing an encroachment of 9.7 feet (90.3 foot setback from property line) into the required 100 foot perimeter buffer. **A variance is required.**
- Truck Loading Spaces §96-78.2(G) – The applicant proposes three (3) truck loading spaces where 18 spaces are required. **A variance is required.**

4. Fence Height §96-80.1(B) – The applicant proposes an eight (8) foot perimeter security fencing where a maximum six (6) foot fencing within rear and side yards and a maximum four (4) foot fence height in a front yard is permitted. **A variance is required.**

### **PLANNING:**

1. **Affordable Housing.** The applicant shall comply with all requirements of Chapter 70.E.(1) of the Elk Township Code on affordable housing development fees.
2. **Use.** The applicant shall provide operational testimony for the following:
  - a. Proposed use.
  - b. Hours of operation.
  - c. Number of Employees
  - d. Parking provisions.  
The applicant shall provide testimony including but not limited to confirmation that no extended or overnight parking is proposed at the site.
  - e. Proposed signage.
  - f. On-site lighting and security.
3. **Buffers.** Per §96-78.2E(2)(j), all cannabis establishments shall have a 100 foot vegetated buffer provided along the perimeter of the entire site except at site entrances and exists. A 100 foot buffer shall be added along the frontage on Buck Road in addition to the 75 foot required front yard setback.

### **PARKING AND LOADING:**

1. Per §96-78.2F, cannabis cultivator establishments require one (1) space for each 1,000 square feet of gross floor area OR one (1) space per two (2) employees at maximum shift.
2. The following indicates the parking demand for the site:

**Required Parking:**

$$247,435.33 \text{ sf} / 1,000 \text{ sf} = 248 \text{ spaces}$$

OR

20 Employees / 2 Employees = 10 spaces

Proposed Parking:

Automobile parking = 48 spaces

3. Per §96-78.2G, every building housing a cannabis establishment requires at least 1 12x25 ft truck loading space, plus one additional truck space for every additional 20,000 square feet of gross floor area.

Required Loading:

5 buildings + (247,435.33 sf / 20,000 sf) = 18 loading spaces

Proposed Loading:

Truck Loading = 3 loading spaces

**SIGNAGE:**

1. No project signage is shown on the plans. The applicant should be prepared to discuss any proposed signage. All signage must conform to the Elk Township sign regulations (Section 96-60).

**TRAFFIC:**

1. The Traffic Impact Study (TIS) indicates the proposed Cannabis Cultivation Facility development will be constructed along southbound Buck Road (County Route 553) in Elk Township and consist of 302,868 square feet (SF) of facilities. The TIS indicates the existing site is mostly vacant / farm fields with several existing structures to remain. The TIS was prepared in accordance with typical traffic engineering standards including Chapter 47 of the New Jersey State Highway Access Management Code and is consistent with Township requirements. The TIS concludes that traffic generated from the proposed development will not have a significant impact on the adjacent roadway network.
2. It is noted, the TIS indicates traffic from both planned developments in Elk Township, Jai & Jas Real Estate, LLC and Silvergate Planned Unit Development, were incorporated into the traffic analysis for the adjacent roadway network for this development.

3. The TIS indicates the Institute of Transportation Engineers (ITE) trip generation rates for this type of facility were not used based on the source data being based on a single site surveyed in the 2010s and not representative of the proposed development. The Applicant's traffic engineer shall provide testimony regarding the actual trip generation used for this development based on the anticipated staffing and delivery.
4. The TIS indicates access will be maintained via the existing site driveway along southbound Buck Road. Buck Road is under Gloucester County jurisdiction therefore Gloucester County access review and approval is necessary.
5. The Vehicle Maneuvering Plan illustrates the travel path for a SU-40 Single Unit Truck. The Plan illustrates the travel path of the SU-40 Single Unit Truck crossing over the center of the cartway into opposing traffic. The Applicant shall provide testimony regarding possible passenger vehicle conflict, delivery schedule, and restriction of delivery vehicles larger than the SU-40 Single Unit Truck including traffic signage.

**GENERAL:**

1. Detailed information as to the status of any Letter of Interpretation (LOI) and any other NJDEP required General Permits required for the subject development shall be provided.
2. The submitted LOI application materials referenced in the DuBois letter of April 9, 2024 shall be provided.
3. Note #G-29 on the "Information Sheet" shall be revised to indicate the Township Engineer not the Design Engineer.
4. The applicant has provided architectural plans for the "headhouse building" only. Plans shall be provided for all proposed and converted structures including greenhouses including the connection between the proposed Headhouse Building and the proposed adjacent greenhouse(s).
5. The applicant has indicated that odor control for cannabis operations will be provided. However, all submitted information is generic in nature and also is not provided for all buildings where cannabis operations are proposed, specifically the drying/auxiliary building. Detailed odor control provisions for all cannabis operations shall be provided.
6. The hatching shown on the plans shall be revised to permit the plans to be more legible.
7. The buildings shall be numbered and keyed to architectural plans for reference purposes.

8. The label for Buck Road shall appear on all plans as necessary.

#### **DEMOLITION PLANS:**

1. The Demolition Plan shows a notation of “poles to remain. However, no poles are shown in the location indicated. Clarification shall be made.
2. The Demolition Plan shows a note that states “Contractor to coordinate relocation of on site power” while also noting “pole to remain”. Clarification shall be made.

#### **SITE PLANS:**

1. The proposed buildings shall be dimensioned on the Site Plans.
2. All proposed buildings shall be dimensioned to a minimum of two (2) property lines for stakeout purposes.
3. The “Administrative Office” and “Drying/Auxiliary Buildings” are called out on the Site Plans but do not appear on the plans. The buildings shall be shown on the plans.
4. The proposed basins shall be dimensioned.
5. No trash and recycling enclosures are shown on the plans. The applicant shall provide testimony regarding trash and recycling generated by the site and provide a trash enclosure in accordance with §96-61.E.
6. Four (4') foot high split rail fence with black wire mesh shall be provided around the top of all proposed basins. Appropriate details shall be added to the plans.

#### **STORMWATER & GRADING:**

1. Existing edge of paving grades shall be provided along Buck Road.
2. There is a vertical grade difference of approximately seven (7') adjacent to the Greenhouse shown on Site Grading Plan 2. Our office recommends an area a minimum of 20' in width be provided adjacent to the building with a maximum grade of five (5%) percent for building maintenance purposes.

3. On Site Grading Plan 2 in the area of the existing 1-story Metal Garage there appears to be an erroneous 23 contour. Clarification shall be made.
4. Proposed spot elevations shall be provided for all proposed building corners.
5. A proposed spot elevation shall be provided between Inlet I-8 and Inlet I-14.
6. Our office recommends that all hatching be removed from the Grading Plans to allow the plans to be more legible.
7. The project has been designed as required by NJAC 7:8-1.6 for “major developments”.
8. The project complies with the stormwater quantity and quality requirements at N.J.A.C. 7:8-5.6.
9. The grate elevation shown on the utility plan for manhole #1 is inconsistent with the elevation shown on the pipe calculations.
10. The last column of the table within the “Basin Outlet Structure Detail” should include the invert of the outflow pipe.
11. The seasonal high water table listed in the design calculations is higher than the estimated seasonal high water table encountered within the soil boring logs and is acceptable.
12. Details shall be provided for the proposed inlets, manholes, and storm pipe installation.
13. A trash rack detail shall be provided.
14. A concrete headwall detail shall be provided.
15. A note should be added indicating that post development infiltration testing is required prior to placement of the sand layers.
16. There are multiple inconsistencies between the “Emergency Spillway Detail” on sheet 35 and the stormwater maintenance manual. The crest elevations and widths shall be revised accordingly.
17. Proof that the stormwater maintenance manual has been recorded in the Gloucester County Clerk’s office must be provided as a condition of approval.

**UTILITIES:**

1. The Utility Plans shall indicate the type of water pipe proposed for the development.
2. The size and type and slope of proposed sanitary sewer pipe for the pipe connecting from the proposed sanitary tank to the proposed septic system shall be indicated on the plans.
3. The Septic Design Details plan has been provided in color and is not legible. Furthermore, some details are missing from the plan. The plan shall be revised and shall be provided in black ink.
4. Our office defers review of the septic system and wells to the Gloucester County Health Department

**LANDSCAPE AND LIGHTING:**

1. In accordance with §96-78.2.E.(2)(j), a 100-foot perimeter buffer is required with existing vegetation or a double row of evergreen trees. The applicant shall add the perimeter buffer to the front of the property.
2. The applicant shall agree to coordinate with the Township Engineer and / or Planner at time of buffer planting to determine if the existing vegetation in the areas that are identified on the plans is sufficient or if the evergreen buffer should be planted in those areas.
3. Topsoil moved during the course of construction shall be redistributed on all regraded surfaces so as to provide at least four inches of even cover to all disturbed areas of the development and shall be stabilized by seeding or planting per §96-50.C(11).a.
4. The applicant shall remove the lighting grid from anywhere where lighting is not proposed.
5. The light grid numbers shall be enlarged to be legible.
6. Lighting should be added to the entrances and walkways of the two greenhouses located to the rear of the site.
7. Lighting shall be added to the drying building and associated parking area.

8. Lighting shall be provided along the entirety of the proposed access drive to Buck Road.
9. Lighting shall be added to the administrative office building and associated parking area.

#### **SOIL EROSION & SEDIMENT CONTROL:**

1. Our office defers review of the Soil Erosion and Sediment Control Plan and Details to the Gloucester County Soil Conservation District (CCSCD). A copy of their approval shall be forwarded to our office and the Borough for our records.

#### **DETAILS:**

1. The Septic Design Detail sheet shall be revised to be legible.
2. A split rail fence with wire mesh detail shall be added to the plans.

#### **OUTSIDE AGENCY APPROVALS:**

This plan set may be subject to the review and approval of the following outside agencies. Evidence of these approvals must be submitted to the Joint Land Use Board and this office prior to the final signature of plans:

1. Gloucester County Planning Board
2. Gloucester County Soil Conservation District
3. Elk Township Fire Official
4. Gloucester County Health Department
5. NJDEP
6. Any other as may be necessary

Although the application is for Preliminary and Final Major Site Plan approval, it is recommended that the Board only act on the Preliminary Major Site Plan portion of the application as there are significant review comments which need to be addressed.

If approved by the Board, the applicant shall revise the application materials as noted above and by the Approving Resolution. When revised plans and materials are resubmitted, they are to be accompanied with a point-by-point response keyed to this letter. We reserve the right to make additional comments pending receipt of revised or additional documentation.

Country Roads Realty, LLC  
Preliminary and Final Major Site Plan with Bulk Variance  
Block 44, Lot 4  
730 Buck Road  
RE – Rural Environmental Zoning District  
Review #2 – Completeness & Technical  
Bach Associates Proj. # ET2025-1  
September 12, 2025  
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Should there be any questions or if additional information is required, please contact the undersigned at (856) 546-8611.

Very truly yours,  
BACH ASSOCIATES, PC



Steven M. Bach, PE, RA, PP, CME  
President



Candace Kanaplue, PP, AICP  
Associate

Cc: Brandon E. DeJesus, Esq., Board Solicitor  
Brian Duffield, Esq, Township Solicitor  
Country Roads Realty, LLC, Applicant/Owner  
Wigmore Investments, LLC, Owner  
Richard T. Wells, Esq., Applicant's Attorney  
Benjamin Mitsmenn, PE, Applicant's Engineer

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