
June 22, 2026

Board Chair Barret Windrem
Borough of Raritan Planning Board
22 First Street
Raritan, New Jersey 08869

**RE: Technical Review I
IAAT Services LLC
Preliminary & Final Minor Site Plan
1137 US Route 202, Raritan, New Jersey
Block 31, Lot 1
Project Number: 3330114**

Dear Board Chair Windrem and Board Members:

This office is in receipt of the following items pertaining to the above-referenced application:

- A. *Certification of Taxes Paid for Block 31, Lot 1 prepared by Tori B. Cesario, Tax Collector for the Borough of Raritan, signed, dated February 3, 2025.*
- B. *W-9 Form for IAAT Services, signed by Isabel Amado, dated April 21, 2025.*
- C. *Certificate of Ownership of Property Applicant, signed by Isabel Amado, dated April 29, 2025.*
- D. *Outdoor Advertising Permit for IAAT Services, signed by Kimbrali Davis, dated December 29, 2025.*
- E. *Topographic Survey entitled "Topographic Survey of Property", prepared by Jeffrey S. Grunn, P.L.S. of Lakeland Surveying, signed, dated February 5, 2026, last revised February 10, 2026, consisting of one (1) sheet. Last revised April 30, 2026.*
- F. *Owner's Consent for Property Inspection and Filing of Land Use Development Application, signed by Jeff Bellew, dated February 12, 2026.*
- G. *Environmental Report entitled "Freshwater Wetland Investigation and Development Review" prepared by Alex Stollery of Trident Environmental, signed, dated March 4, 2026, consisting of seven (7) pages.*
- H. *Site Plans entitled "Site Plan Proposed Multimessage Billboard" prepared by William R. Vogt, Jr. P.E., signed, dated March 4, 2026, consisting of three (3) sheets. Last Revised May 5, 2026.*
- I. *Borough of Raritan Site Plan Application Form, signed by Isabel Amado, dated March 9, 2026.*
- J. *Cover Letter prepared by Stephen P. Sinisi, Esq. of the Law Offices of Stephen P. Sinisi, Esq., LLC, signed, dated March 13, 2026.*
- K. *Borough of Raritan Checklist 2 for Determining Completeness of Application for Minor Site Plan, unsigned, undated.*
- L. *Variance Justifications entitled "Planner's Variance Justifications" unsigned, undated.*

OFFICE LOCATIONS**www.vancleefengineering.com**

Lebanon, NJ
908-735-9500

Hamilton, NJ
609-689-1100

Toms River, NJ
732-573-0490

Freehold, NJ
732-303-8700

Bethlehem, PA
610-332-1772

Hillsborough, NJ
908-359-8291

Mt. Arlington, NJ
862-284-1100

Phillipsburg, NJ
908-454-3080

Doylestown, PA
215-345-1876

Leesport, PA
610-670-6630

- M. *Borough of Raritan Combined Land Use Board Public Notice of Hearing, signed by Stephen P. Sinisi, Esq. of the Law Offices of Stephen P. Sinisi, undated.*
- N. *Borough of Raritan Application for Sign Permit, signed by Isabel Amado, undated.*

I. **Project Summary:**

A. **Project History**

On March 13, 2026, the Borough of Raritan received the above-referenced application via email to the Interim Planning Board Secretary, Lou Gara, and via hand delivery.

The subject application was deemed incomplete by the Borough of Raritan Planning Board at the meeting held on April 22, 2026, in response to the letter issued by this office on April 21, 2026.

The subject Application was deemed complete by the Borough of Raritan Planning Board at the meeting held on May 27, 2026, in response to the letter issued by this office on May 21, 2026.

At the June 24th Land Use Board meeting, the Applicant voluntarily adjourned their hearing for the July 22nd Land Use Board meeting.

B. **Project Description**

This Application is for Minor Site Plan approval of a double-sided electronic billboard located at Block 31, Lot 1, further described as 1137 US Route 202 in the Borough of Raritan, New Jersey. The tract is located within the Borough's OM-3 (Limited Industrial) District. The existing lot is approximately 43,615 SF (± 1.00 Ac) in size.

Block 31, Lot 1 fronts US Route 202 and is currently occupied by a one-story masonry structure located in the southern portion of the tract. Further to the south there are two (2) metal accessory structures, and two (2) frame sheds. These structures make up an auto body repair shop, therefore, the existing principal use of the site as commercial. North of the auto body repair shop on the property, there is an existing asphalt parking lot for customers and cars waiting to be repaired. A long asphalt drive lined with wooden bollards leads to the parking lot. A wood fence divides the front and rear of the property, and a chain link fence lines either side of the property. Overhead wires provide power to the site from the electrical grid. A manhole exists on the property; it is unclear if this manhole is part of the sanitary sewer service to the property. An asphalt pad is located in the rear of the property as well. Lastly, there is a metal utility pole located to the rear of the one-story masonry building.

The Applicant is not proposing any demolition on site as a part of this Application. No improvements are to be made to any of the existing structures on site. As previously stated, the Applicant is proposing an electronic multmessage billboard in the northern portion of the property. The multmessage billboard is to have a 2-sided screen with dimensions of 48' wide by 14' high. The billboard features a 3' apron below the screen and a catwalk. The monopole that the sign is erected upon will have a 4' diameter, with a 6' diameter concrete foundation. The overall height of the proposed billboard is 50 feet. The billboard is proposed to be set back 10 feet from the right-of-way. The limit of disturbance for this project is minimal, only approximately 30 SF. Also included in this Application is a proposed dedication to the New Jersey Department of Transportation right-of-way of US Route 202, with a total area to be dedicated of $\pm 2,191$ SF. This will render the new lot area $\pm 41,423$ SF (± 0.95 Ac) in size. The proposed use will remain a commercial auto body repair shop with the additional use of a multmessage billboard. There does not appear to be any improvements to the existing landscaping, stormwater improvements or lighting as a part of this Application.

II. Completeness Review

The Applicant has submitted this application for Minor Site Plan Approval. Based upon review of the provided documentation and checklists, it is the recommendation of this office that the Board deem this application incomplete based on the following commentary:

The Applicant has provided a revised submission to the Board, in response to the letter issued by this office on April 21, 2026. This application is now sufficient for completeness, as all outstanding items have been addressed by the Applicant. This office recommends that the subject application be deemed **complete**, based on the commentary provided below.

1. **Minor Site Plan Checklist**

- a. §207-47.B(2)(1) – Application form, including checklists, 22 copies; one CD, USB flash drive or most recent compatible technology (please contact the Borough to determine its capabilities), with all submission materials, including plans and reports, in PDF format.
Verification Required – The Borough of Raritan shall provide verification that all listed submission materials have been provided as a part of this Application.
(2025-05-21) Verification provided.
- b. §207-47.B(2)(2) – Plans: Six sets of full-sized plans that have been signed and sealed by a New Jersey licensed professional engineer or New Jersey professional licensed surveyor, as required, and folded into eighths with the title block revealed, and 22 sets in 1/2 size. All submission materials must be collected into 22 packets using the 1.2 size plan sets. All plans must be folded. Non-collated materials and or unfolded plans will be rejected and all materials returned to the Applicant.
Verification Required – The Borough of Raritan shall provide verification that all listed plans have been provided accurately and appropriately, signed and sealed by a New Jersey licensed professional engineer or a New Jersey professional licensed surveyor.
(2025-05-21) Verification provided.
- c. §207-47.B(2)(3) – Protective covenants or deed restrictions applying to the land being subdivided. (20 copies)
Verification Required – The Borough of Raritan shall provide verification if the Applicant has provided 20 copies of a valid deed description describing the updated site boundary as a result of the land dedication to the New Jersey Department of Transportation right-of-way. It is recommended that, at the very least, sample language be provided during the course of a hearing.
(2025-05-21) Verification provided.
- d. §207-47.B(2)(4) – Application fee, executed escrow agreement and appropriate review fee.
Verification Required – The Borough of Raritan shall provide verification that the Applicant has provided the Application fee, executed escrow agreement and the appropriate review fee.
(2025-05-21) Verification provided.
- e. §207-47.B(2)(5) – Separate application (and fee) for any conditional use or variance with the application.
Complies – The Applicant has submitted a separate application from the preliminary and final site plan for the requested variances submitted with this Application.
- f. §207-47.B(2)(6) – Certification from the Tax Collector that all taxes and assessment on the property are paid in full.
Complies – The Applicant has provided a Certification from the Tax Collector stating that all taxes are paid in full.
- g. §207-47.B(2)(7) – Disclosure form pursuant to N.J.S.A. 40:55D-48, providing the names and addresses of all persons owning 10% of the stock in corporate applicant or 10% interest in any partnership applicant.
Complies – The Applicant has provided the required Certificate of Ownership of Property Applicant.

- h. §207-47.B(2)(8) – Proof of filing with the Somerset County Planning Board, Somerset-Union Soil Conservation Service and any other outside agencies from which approval is necessary.
Verification Required – The Applicant is proposing a Minor Site Plan that does not normally require approval from any outside agencies besides an NJDOT Outdoor Advertising Permit, which it received on December 29, 2025. It is strongly suggested the Applicant submit to the Somerset County Planning Board due to the impact on the neighboring municipality.
- i. §207-47.B(2)(9) – Certification that applicant is owner or authorized agent, or consent of owner to file application.
Complies – The Applicant has provided an Owner's Consent signed by the property owner.
- j. §207-47.B(2)(10) – Map scale not less than 1-inch equals 100 feet, showing the entire tract on one sheet, using 1 of 4 standard sheet sizes: 8 1/2 x 13; 15 x 21; 24 x 36; or 30 x 42 inches per ordinance.
Complies – The Applicant has provided an appropriate map scale, on a sheet size that follows the checklist.
- k. §207-47.B(2)(11) – A key map showing the entire tract and lands within 2,000 feet at a scale of 1-inch equals not less than 1,000 feet.
Complies – The Applicant has provided a Key Map at the appropriate scale.
- l. §207-47.B(2)(12) – Name, address and telephone number of the following: a. Professional responsible for preparing the plans. B. Owner or owners of the site. C. Subdivider or developer.
*Incomplete – The Applicant has not provided the telephone number of the developer or the owner on the plans.
(2025-05-21) Complies – Contact information for the Applicant has been provided on Sheet 1 of the site plan.*
- m. §207-47.B(2)(13) – The names of all adjoining owners of any and all property located within 200 feet of the site, as shown on the most recent tax list prepared by the Borough Tax Assessor.
*Incomplete – The Applicant has provided the names of all adjoining owners within 200 feet of the site on the Cover Sheet. It is noted that the sample notice provided as part of this application uses the outdated address for the Borough of Raritan Municipal Building. Kindly revise this letter to indicate "9 W Somerset Street, Raritan, NJ 08869" as the municipal address and location/time of the meeting prior to issuance.
(2025-05-07) Complies – The address for the Borough has been revised accordingly.*
- n. §207-47.B(2)(14) – The Tax Map sheet, and existing block and lot numbers of tract to be subdivided or developed and all adjacent lots.
Complies – The Applicant has provided the Tax Map sheet and the block and lot numbers of all adjacent lots.
- o. §207-47.B(2)(15) – Scale, North arrow and original date, with any revision dates.
*Incomplete – It does not appear that the Applicant has provided a North arrow on the all of the submitted plans.
(2025-05-21) Complies – North arrow has been provided on Sheet 2 of the site plan.*
- p. §207-47.B(2)(16) – Zoning district(s), including district names and zone schedule.
Complies – The Applicant has provided the zoning district of the project site and the correct corresponding bulk table.
- q. §207-47.B(2)(17) – Site plan layout, showing boundaries of site, natural features, all developed, undeveloped and to-be-developed portions of tract including buildings, circulation, parking, landscaping.
Complies – The Applicant has provided all existing and proposed features on the Site Plan.
- r. §207-47.B(2)(18) – Preliminary building plans, floor plans and elevations.
Not Applicable – This Application does not include the construction of any buildings.
- s. §207-47.B(2)(19) – The locations of existing streets with names, utilities, easements and their purpose, restriction with description thereof, rights-of-way, streams and natural features, wetlands or floodplains and drain ditches.
Complies – The Applicant has all existing natural and manmade features on the Site Plan.

- t. **§207-47.B(2)(20)** – Existing contours at sufficient intervals to determine general slope and natural drainage.
Complies – The Applicant has provided existing contours at one-foot intervals, which is sufficient.
- u. **§207-47.B(2)(21)** – Location of existing sewer lines and waterlines to serve the tract.
Incomplete – The Applicant has not provided existing sewer lines or waterlines that serve the tract or included a note to indicate their absence.
(2025-05-21) Complies – Applicant has provided a revised topographical survey and site plan in which approximate locations of all utilities have been provided.

III. **Zoning Review:**

All municipalities in the State of New Jersey have active zoning codes effectuated by their Land Use Plans, an element of each municipality’s Master Plan. These zoning codes provide legally enforceable, standardized schedules of bulk requirements, outlining the maximum and minimum distances from lot lines, percentage of impervious coverage, and other various attributes of each parcel based on the location of that parcel within the municipality. This also includes permitted, conditional, accessory and prohibited uses. Strict adherence to this code is required.

However, pursuant to the Municipal Land Use Law (M.L.U.L.)’s, N.J.S.A. 40:55D-70, the Board of Adjustment may: “a. Hear and decide appeals where it is alleged by the appellant that there is error, in any order, requirement, decision or refusal made by an administrative officer based on or made in the enforcement of the zoning ordinance;” and “b. Hear and decide requests for interpretation of the zoning map or ordinance or for decisions upon other special questions upon which such board is authorized to pass by any zoning or official map ordinance...”

As such, the Applicant has requested variances in accordance with N.J.S.A. 40:55D-70. The following table summarizes the existing and proposed conditions juxtaposed to the permissions and allowances (requirements) of the zoning code:

Light Industrial Zoning District – OM-3

Block 31, Lot 1

Description	Permitted	Existing	Proposed	Comment
Min. Lot Size	20 Acres	1 Acres	.95 Acres	Variance (1)
Min. Lot Width	500 ft.	100.3 ft.	100.3 ft.	Variance (1)
Min. Front Yard Setback	200 ft.	281.3 ft.	281.3 ft.	Complies
Min. Front Yard Setback (Billboard)	10 ft.	N/A	10 ft.	Complies
Max Front Yard Setback (Billboard)	100 ft	N/A	10 ft.	Complies
Min. Rear Yard Setback	100 ft.	70 ft.	70 ft.	Variance (1)
Min. Rear Yard Setback (Billboard)	100 ft.	N/A	350.78 ft.	Complies
Min. One Side Yard Setback	150 ft.	21.9 ft.	21.9 ft.	Variance (1)
Min. Both Side Yard Setback	300 ft.	43.85 ft.	43.85 ft.	Variance (1)
Min. Front Accessory Building Setback	200 ft.	280.9 ft.	280.9 ft.	Complies
Min. Rear Accessory Building Setback	100 ft.	1 ft.	1 ft.	Variance (1)
Min. Side Accessory Building Setback	100 ft.	0 ft.	0 ft.	Variance (1)
Max. Building Height	100 ft.	19.16 ft.	19.16 ft.	Complies
Max. Billboard Height	50 ft.	N/A	50 ft.	Complies
Max. Impervious Cover	40%	35.88%	35.23%.	Complies
Min. Landscape Cover	30%	64.12%	64.77%	Complies
Min. Lot Frontage	500 ft.	100.26 ft.	100.8 ft.	Variance (1)
a. Variance Required, Existing Non-Conforming Condition (1)				

1. Bulk Schedule “C” Variance**a. §207-123.F – Bulk Schedule (Min. Lot Size – Overall Tract)**

Variance Required – The subject tract has an existing lot size of .95 acres. Within the Borough of Raritan OM-3 zoning district, a minimum lot size of 20 acres is required. Therefore, variance relief is required from the Board in order to permit the proposed improvements. It should be noted by the Board that this is an existing non-conformance that will remain unchanged.

b. §207-123.F – Bulk Schedule (Min. Lot Width – Overall Tract)

Variance Required – The subject tract has an existing lot width of 100.3 feet. Within the Borough of Raritan OM-3 zoning district, a minimum lot width of 500 feet is required. Therefore, variance relief is required by the Board in order to permit the proposed improvements. It should be noted by the Board that this is an existing non-conformance that will remain unchanged.

c. §207-123.F – Bulk Schedule (Min. Rear Yard Setback – Principle Structure)

Variance Required – The existing principle structure within the subject tract has a rear yard setback of 70 feet. Within the Borough of Raritan OM-3 zoning district, a rear yard setback to the principle structure of 100 feet is required. Therefore, variance relief is required from the Board in order to permit this non-conformity. It should be noted by the Board that this is an existing non-conforming condition within the tract that will remain unchanged.

d. §207-123.F – Bulk Schedule (Min. One Side Yard Setback – Principle Structure)

Variance Required – The existing principle structure within the tract contains a side yard setback of 21.9 feet. Within the Borough of Raritan OM-3 zoning district, a side yard setback of 100 feet is required to the principle structure. Therefore, variance relief is required. It should be noted that this is an existing non-conforming condition that will remain unchanged as a result of the proposed site improvements.

e. §207-123.F – Bulk Schedule (Min. Both Side Yard Setback – Principle Structure)

Variance Required – The principle structure within the tract has a combined side yard setback of 43.85 feet. Within the Borough of Raritan OM-3 zoning district, a combined side yard setback of 300 feet is required. Therefore, variance relief is required from the Board in order to permit this non-conformity. It should be noted by this Board that this is an existing non-conforming condition that will remain unchanged.

f. §207-123.F – Bulk Schedule (Min. Rear Side Yard Setback – Accessory Structure)

Variance Required – The existing accessory structure within the tract has a rear yard setback of 1 foot, whereas a rear yard setback of 100 feet is required for an accessory structure. Therefore, the Applicant requires variance relief in order to permit this non-conformity. It should be noted by the Board that this is an existing non-conforming condition that will remain unchanged.

g. §207-123.F – Bulk Schedule (Min. Side Yard Setback – Accessory Structure)

Variance Required – The existing accessory structure within the tract has a side yard setback of 0 feet, whereas a side yard setback of 100 feet is required for an accessory structure within the OM-3 zoning district. Therefore, variance relief is required by the Board. It should be noted that this is an existing non-conforming condition within the tract that will remain unchanged.

h. §207-123.F – Bulk Schedule (Route 202 Lot Frontage – Overall Tract)

Variance Required – The tract in which the improvements are proposed has a frontage along Route 202 of 100.80 feet. Within the Borough of Raritan OM-3 zoning district, a lot frontage along Route 202 of 500 feet is required. Therefore, variance relief is required from the Board in order to permit the proposed improvements. It should be noted by the Board that this is an existing non-conformity that will remain unchanged.

IV. **Technical Review:**

1. Applicant shall provide testimony to demonstrate conformance with Borough of Raritan Ordinance 2026-11, specifically that “No part of any Billboard may be located within 500 feet of the lot line of any residential zone”. It is noted that while no Raritan Borough residences are affected, it is possible that residential lots from adjacent municipalities may be affected.
2. Applicant shall provide testimony to the proposed limit of disturbance. The site plan identifies that the limit of disturbance will not extend beyond the base of the proposed billboard, not exceeding 30 square feet. The limit of disturbance shall be revised to include areas that will be utilized for staging of materials, and a temporary soil stockpile. Should the Board rule favorably on this application, the limit of disturbance shall be staked out prior to construction, and maintained throughout. Applicant shall revise the site plan to reflect this testimony.
3. Testimony shall be provided to the location of a stabilized construction entrance, and temporary soil stockpile. Construction details shall be provided within the site plan for all soil erosion and sediment control measures.
4. Applicant shall provide design plans and a structural analysis report for the billboard from a licensed structural engineer. It shall be demonstrated within this report that the billboard can withstand wind loads in accordance with the International Building Code (IBC) and ASCE 7. Additionally, reports shall indicate the required depth of the foundation based upon soil conditions and material typing. All steel, foundation, and connection points must meet calculated load ratings prior to final approval.
5. Testimony shall be provided to any minor site grading that may occur in the vicinity of the billboard foundation. Prior to restoration, grading shall be performed (if required) in order to prevent ponding of stormwater at the base of the billboard foundation, as the survey indicates billboard construction will take place in a lower elevation compared to adjacent topography.
6. This office strongly recommends that the Applicant provide landscaping improvements within close proximity of the proposed billboard. The installation of high and low cover vegetation will increase groundwater infiltration of stormwater, further reducing runoff and ponding. Additionally, plantings will serve as natural screening for the base of the billboard.
7. Applicant shall provide a copy of the will-server letter from the governing electrical utility company, stating that the proposed overhead electrical service extension is feasible. This letter shall also state that the proposed billboard is located sufficiently away from the existing overhead electrical service.
8. Prior to the commencement of construction, the contractor shall verify both the location and depths of existing underground utilities, including gas, water, and sewer. It should be noted that the survey provided only identifies the location of the gas line.
9. Testimony shall be provided to the intensity of lighting that will be produced by the billboard.
10. Applicant shall provide copies of the transfer of ownership for the portion of land to be dedicated to the NJDOT to the Board attorney for review.
11. Letters of approval or no interest shall be provided from all applicable governing agencies, including but not limited to:
 - a. The Somerset County Planning Board
 - b. Somerset County Soil Conservation District
 - c. Borough of Raritan Fire Department
 - d. Borough of Raritan Police Department

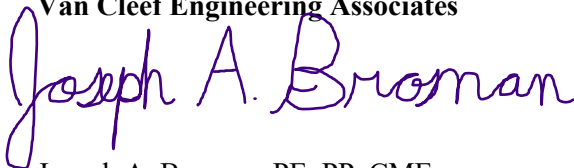
12. Applicant shall provide response to peer review of cited FHWA study titled “A Peer-Reviewed Critique of the Federal Highway Administration (FHWA) Report Titled: “Driver Visual Behavior in the Presence of Commercial Electronic Variable Message Signs (CEVMS),” (Wachtel, 2015). Peer review indicates that the study cited by applicant in safety report contains methodological issues that limit the validity of its conclusions, including (but not limited to) inability to replicate findings due to lack of reporting sufficient identification of signs and roads studied. It is noted that, in a similar application for a billboard along the same highway, concerns were previously raised about the applicability of this study to US Highway 202, especially given the high number of driveways and similar points of entry/exit to the road.
- a. Additionally, this office observes that the cone of vision analysis used in the engineer’s report on safety, environmental, and visual impacts is derived from the cited FHWA study’s comparison of relative eye diversion between conventional and electronic variable message billboards within the data collection area, not between electronic billboards and a non-billboard condition more generally. Even holding that the cited study’s findings are valid, they do not support extrapolation of the data to establish a general-use formula for assessing the visual and safety impacts of such signage in other contexts.
 - b. Unless these discrepancies can be adequately addressed to the satisfaction of the Board, our office recommends that the applicant undertake a site-specific analysis to determine the specific potential for safety impacts of the proposed development on the adjacent roadway.

We reserve the right to further comment based on Applicant’s testimony and future submittals.

If you require additional information or have any questions, please feel free to contact me at my office.

Very truly yours,

Van Cleef Engineering Associates



Joseph A. Brosnan, PE, PP, CME
Borough/Planning Board Engineer

cc: All Board Members, via Board Secretary
IAAT Services, LLC, Applicant (via U.S. Mail: 104 Vance Avenue, Lavallette, NJ, 08735)
Jeffrey A. Bellew, Owner (via U.S. Mail: 1137 US Route 202, Raritan, NJ 08869)
Eric L. Keller, Applicant’s Engineer (via U.S. Mail: 66 Grand Avenue, 2nd Floor, Englewood, NJ 07631)

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