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TO: Dr. Edward Williams, P.P., AICP, CSI, Director of Planning & Development

FROM: Kyle MacGeorge, P.E, LEED AP
Sean Moronski, P.P., AICP
Rachel Fifield, P.P., AICP

INFO: Chris Hager, P.E., LEED AP
Faith Orsini, CUHC
Mark Tufaro, John Delli Carpini – Hammes Healthcare

DATE: 20 March 2024

RE: Environmental Impact Assessment
Cooper University Health Care Tower Project (Phase A)
Block 1402, Lot 1
Camden City, Camden County, New Jersey
Langan Project No.: 220187001

This memorandum addresses the requirements of an environmental impact assessment (EIA) as outlined in §870-272 of the Camden zoning and land use ordinance. Applicants requesting preliminary and major site plan approval need to prepare an EIA as part of the application. The EIA describes site environmental conditions, impacts during and after construction, measures to minimize or eliminate negative impacts, permits and approvals required, reference list, and, if necessary, suitable mitigation.

Project Site Location and Existing Conditions. The project site is the Cooper University Medical Center (Cooper), located at 1 Cooper Plaza in Camden, New Jersey (Figure 1 – USGS Map). Surrounding streets include Dr. Martin Luther King Boulevard to the north, Haddon Avenue to the west, Benson Street to the south, and South 6th Street to the west (Figure 2 - Vicinity Map). City tax records identify the project site as Block 1402, Lot 1, as noted in the subject reference above (Figure 3 – Tax Map). The project area on the site is the northeastern section near the corner of Martin Luther King, Jr. Boulevard and Haddon Avenue. The project area is in the Cooper Plaza Redevelopment Area, which is subject to the requirements of the Cooper Plaza Redevelopment Plan.

The project area is 7.802 acres and consists of a landscaped area with sidewalks (Figure 4 – Aerial Photograph). The landscaped area has been present since 2006, when it replaced a parking garage that occupied the project area from 1973 to 2006. Available information on historical uses at the project area dates to the 1890s.

MEMO

Project Description. Cooper University Health Care (CUHC) is proposing to improve the Cooper University Hospital located in Camden, New Jersey. The initial phase of this project consists of the construction of "Tower A." CUHC continues to evaluate future phases of development and the CUHC will submit them as part of any separate application. The proposed Tower A will be a 10-story hospital-building expansion with an approximately 35,570 square foot footprint. Cooper intends that the Tower A expansion will better serve patients and the community by upgrading CUHC's aging facilities with a new, state-of-the-art healthcare space. Once constructed, CUHC will begin transitioning existing healthcare uses from older areas of the hospital into the newly constructed Tower A.

The planning and design of the specific spaces within the building is still evolving along with the number of beds and new employees. This project phased will result in a limited increase in staff and beds. The proposed expansion will house a maximum of 125 additional beds and 50 additional employees during the largest employment shift of largest employment, in addition to 4 new doctors. If CUHC chooses a design that results in the maximum increase of beds and employees, the parking demand would increase by no more than 92 spaces, which CUHC plans to address by leasing spaces in the garage sites near the hospital. Tower A is part of Cooper's long-term investment in the community, and it will serve as the initial project for future demolition and construction to upgrade other areas of the hospital campus.

Potential Impacts. This section reviews the potential positive and negative impacts during and after construction, including unavoidable negative impacts.

- Soil Erosion and Sedimentation. The NRCS Web Soil Survey indicates that the site is composed entirely of Urban Land (UR). This consists of surfaces covered by pavement, concrete, buildings, and other structures underlain by disturbed and natural soil material.

The project expects minimal soil erosion and sedimentation during construction. To minimize erosion and sediment transport during and after construction, the project will implement a soil erosion and sediment control plan. The Soil Erosion and Sediment Control Plan (CE100 through CE104, bound separately) will be subject to the Camden County Soil Conservation District review and approval prior to earth disturbance. The project would not have an adverse impact regarding soil erosion and sedimentation.

- Flooding and Flood Plain Disruption. The project site is not in the floodplain or floodway areas (Figure 5 – FEMA Effective FIRM). The project would not result in impacts regarding flooding or floodplains.
- Degradation of Surface Water Quality. There are no surface waters at the project site. The nearest surface water is the Cooper River, a freshwater nontrout (FW2-NT) river located approximately 2,700 feet northeast of the project site (Figure 6 – NJDEP Surface Waters). There are no wetlands on the project site. The nearest wetlands are located approximately 2,600 feet northeast of the project site (Figure 7 – NJDEP Wetlands Map). The project site is in the Cooper River (Below Route 130) HUC-14 watershed (Figure 8 – NJDEP HUC-14 Watershed Map).

MEMO

- In accordance with the stormwater runoff quantity standards set forth in N.J.A.C. 7:8-5.6(b)2 and city requirements, there is no increase, as compared to the pre-construction condition, in the peak runoff rates of stormwater leaving the site for the current and projected two-, 10-, and 100-year storm events. Any increased volume, change in timing, or increased rate of stormwater runoff would not result in additional flood damage below the point of discharge of the project. The project would not have an adverse impact on surface water quality.
- Ground Water Pollution. According to N.J.A.C. 7:8-5.4(a) 2.ii and city requirements, part of the project is exempt from the groundwater recharge requirement because the project site is in an urban redevelopment area and meets the definition for redevelopment. In lieu of infiltration systems, the project proposes stormwater systems that manage water quality and detain the peak rate of runoff. The project would not have an adverse
- Sewage Disposal. The project site is in a sewer service area (Figure 9 – NJDEP Sewer Service Area). During site plan review, the applicant is coordinating sewer service with the city. The applicant will address Issues regarding sewage disposal during site plan review.
- Solid Waste Disposal. A private waste hauler will manage the solid waste and recycling for the project, including medical waste. The operator will comply with applicable state and local recycling requirements. The project would not have an adverse impact regarding solid waste disposal.
- Vegetation. Unless noted on the site plan, site demolition will result in the removal of all existing structures, pavement, and other features (Demolition Plan, Sheet No. CD100, bound separately). The landscape plan involves softening and shading Haddon Avenue and MLK Boulevard edges of this corner site with ten shade trees and eight ornamental trees. Site landscaping also includes 59 deciduous shrubs, 38 evergreen shrubs, and a variety of annual plantings and groundcovers. (Landscape Plan, Sheet No. LP101, bound separately). The project would not have an adverse impact regarding site vegetation.
- Scenic and Historic Features On and Off Site. The project lot is an Identified Individual historic property but is not National Historic Landmark (NHL) eligible. The site is also in Panel AW195 of the NJDEP Archaeological Site Grid. The project would not have an adverse impact on scenic and historic features on and off-site.
- Previous Uses at Project Area. Langan reviewed environmental conditions at the site and surrounding area with the potential to impact the project. A laboratory occupied the site up to 1926. At the southeast part there was a laundry from at least 1926 to 1950. A parking garage was present from 1973 to 2006. Based on previous uses, recommended next steps include a Phase II Environmental Site Assessment and further research.

MEMO

- Air Quality. The Clean Air Act requires the U.S. Environmental Protection Agency (EPA) to set National Ambient Air Quality Standards (NAAQS) for six "criteria air pollutants". The following air quality monitoring stations in Camden are closest to the project site:
 - 266-298 Spruce Street (Nitrogen Dioxide - NO₂, Carbon Monoxide – CO and Particulate Matter - PM_{2.5})
 - 600 Morgan Street (Particulate Matter - PM₁₀)

The 2022 data collected at these monitoring stations is representative of the ambient air quality at and around the project site. Air quality monitoring data indicates that existing area air quality complies with the current NAAQS. Table 1 provides ambient air quality monitoring data.

Table 1: 2022 Ambient Air Quality Monitoring Data.

Pollutant	Averaging Period	Primary NAAQS (µg/m³)	NJ Ambient Air Monitoring Concentration	Location
Nitrogen Dioxide NO₂	1-hour	68 ppb	45.33 ppb	266-298 Spruce St; 3-yr avg, 98th percentile of 1-hr concentrations.
	Annual	10.74 ppb	11.39 ppb	266-298 Spruce St; annual mean
Carbon Monoxide CO	1-hour	1.5 ppm	1.7 ppm	266-298 Spruce St; not to be exceeded more than once per year.
	8-hour	0 ppm	1.2 ppm	266-298 Spruce St; not to be exceeded more than once per year.
Particulate Matter PM₁₀	24-hour	50µg/m ³	44 µg/m ³	60 Morgan St; 2 nd highest
Particulate Matter PM_{2.5}	24-hour	19 µg/m ³	22.67 µg/m ³	266-298 Spruce St. 3-year average, 98 th percentile
	Annual	8.4µg/m ³	9.2 µg/m ³	266-298 Spruce St. 3-yr average, annual mean

Source: EPA Air Quality Monitor Values Report, 2022

The monitoring stations meet NAAQS requirements. New traffic from the project will consist of employee vehicles, vans, and a small number of tractor trailers. After construction, the project would result in minimal impacts. When added to the background concentrations, which comply with NAAQS, there would be no adverse air quality impacts from the project.

- Noise. Noise regulation is subject to the New Jersey Noise Control Act (N.J.A.C. 7:29). All municipal noise ordinances must be identical to the State Model Noise Control Ordinance to be acceptable to the NJDEP, which oversees noise control rules and regulations. Noise level will increase temporarily during construction activities, which are subject to hours of operation limits outlined by the applicable municipal ordinances.

After the project completion, hospital operations will contribute steady noise from rooftop equipment and hospital operations. The project will comply with the applicable state and local noise level standards. The project would not have an adverse impact regarding noise.

Measures to Minimize or Eliminate Negative Impacts.

- Drainage plans. The pre-development condition of the project site comprises one primary drainage area (Stormwater Management Memorandum, bound separately). The drainage area discharges to an existing 24-inch brick city sewer located in MLK Boulevard. The post-development condition of the project site will comprise one drainage area, draining into the same location, but slowed by the underground detention system. The project stormwater management approach meets the requirements of N.J.A.C. 7:8 and the city requirements. The project would not have an adverse impact on drainage.
- Water supply and water conservation. As part of the overall site plan application, the city will review water supply issues. The project would not have an adverse impact on water supply as the proposed tower is an expansion of the existing planned hospital use.
- Energy conservation measures. Where possible, the project will implement measures to conserve energy for the operation of mechanical and electrical systems, including but not limited to the following operations:
 - Motion sensors in appropriate locations to avoid lighting areas that are not in use.
 - Mechanical equipment efficiency for energy conservation to the extent possible.
 - Temperature set points based on specific needs, including but not limited to, storage types, needs of patients and staff, etc.
- Noise reduction techniques. Noise associated with the project construction will be temporary and will dissipate as distance from the source increases. When the project is operational, noise levels at the site will comply with applicable state and local noise performance standards. With noise reduction plans during construction, the project would not have an adverse impact regarding noise.
- Landscaping. A mix of shade trees and decorative trees shade and soften the site from the street frontage, while substantial shrubs and smaller plantings soften the site internally. The plan is part of the landscape plan submitted for site plan review.

MEMO

Permits and Approvals Required. Table 2 outlines the following required permits and approvals for the project:

Table 2: Permits and Approvals Required for Project

Agency	Permit Type
Camden Redevelopment Agency (CRA)	Presentation to CRA prior to development application, if required by city.
City of Camden Planning Board	Preliminary/final site plan approval.
City of Camden Water and Sewer	Water and sanitary sewer capacity approval
Camden County Municipal Utility Authority (CCMUA)	Sewer Connection Approval
Camden County Planning Board	Planning Approval or letter of no interest
Camden County Soil Conservation District	Soil erosion and sediment control certification.
NJ Department of Environmental Protection (NJDEP)	NJPDES authorization to discharge stormwater
New Jersey Department of Community Affairs (NJDCA)	Building review

The permit summary does not include specific construction or building permits that the architect, general contractor, and the city building department or other agencies may require various trades to obtain.

References. The following documents support the EIA findings:

- Site Plan, prepared by Langan, last dated March 20, 2024.
- City of Camden Zoning and Land Use Ordinance, Chapter 870, adopted by the City Council of the City of Camden December 14, 2010, by Ord. No. MC-4585.
- Cooper Plaza Redevelopment Plan, City of Camden, Camden County, NJ, adopted March 2005 and most recently amended May 13, 2005.
- Environmental Data Resources, Inc. (EDR, Inc.), Aerial Photo Decade Package, 22 June 2023
- EDR, Inc., Certified Sanborn® Map Report, 25 June 2023
- EDR, Inc., City Directory Abstract, 23 June 2023
- EDR, Inc., Historical Topo Map Report, 22 June 2023

MEMO

Environmental Impact Assessment
Cooper University Health Care Tower Project (Phase A)
Block 1402, Lot 1
Camden City, Camden County, New Jersey
Langan Project No. 220187001 - Page 7 of 7

- EDR, Inc., Radius Map Report™ with GeoCheck®, 23 June 2023
- U.S. Environmental Protection Agency, Outdoor Air Quality Data, Monitor Values Report, 2022, <https://www.epa.gov/outdoor-air-quality-data/monitor-values-report>
- Stormwater Management Report for Cooper Hospital

The project would not have an adverse environmental impact on the site or surrounding community. The project will expand the footprint of the hospital campus to provide more modernized and efficient services, in line with multiple objectives of the Cooper Plaza Redevelopment Plan, which aims to upgrade functioning institutional land uses, such as the Cooper Medical Center, and create momentum for redevelopment through phasing of development. This project is an upgrade of an institutional land use that involves phasing to create momentum for redevelopment in the area and furthers the goals of the city's redevelopment plan adopted for the project site and area, including "promote Cooper University Hospital's expansion" and "improve area infrastructure."

Langan Engineering and Environmental Services, Inc.



Kyle MacGeorge, P.E., LEED AP®
Associate

New Jersey Professional Engineer License No. 24GE05751600



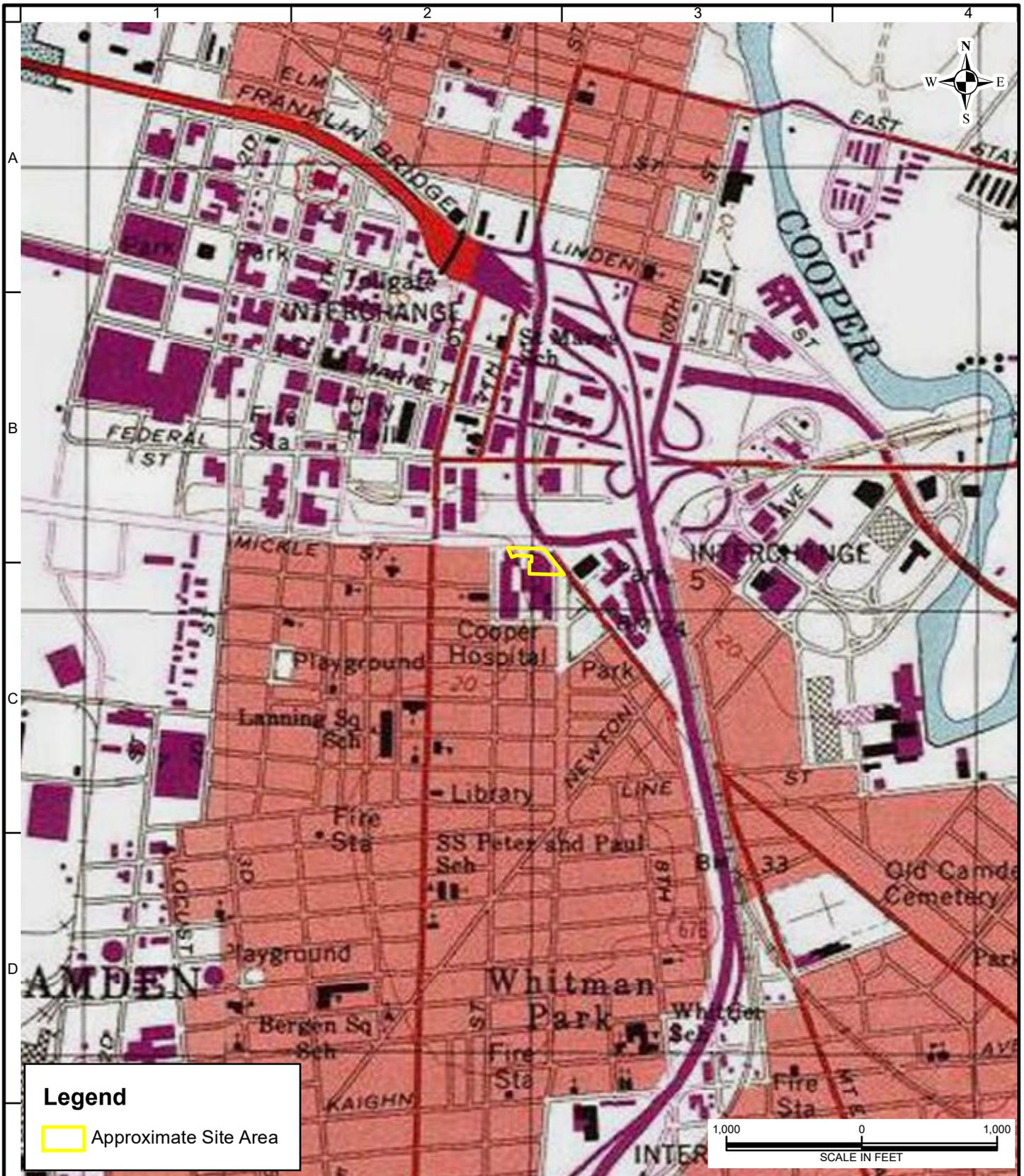
Sean Moronski, P.P., AICP
Senior Project Manager

New Jersey Professional Planner License No. 33LI00560100

Attachments: Figures

NJ Certificate of Authorization No. 24GA27996400

FIGURES



Map References: Map References: Esri USA Topo Maps 2020 (USGS Quad: Camden NJ, PA)

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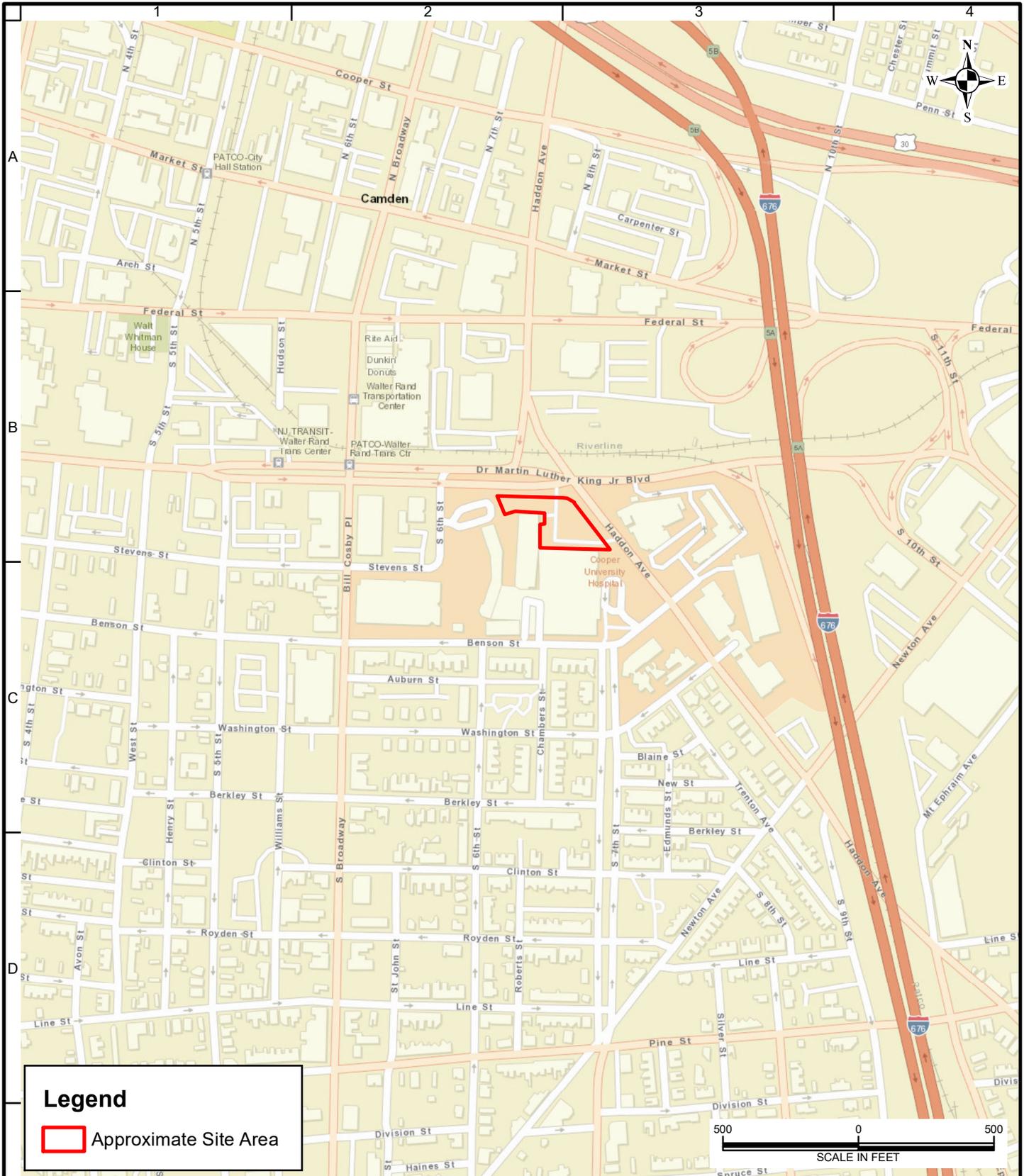
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Project
**COOPER UNIVERSITY
 HEALTHCARE PHASE 1**
 PORTION OF BLOCK No. 1402 LOT No 1

CITY OF CAMDEN
 CAMDEN COUNTY NEW JERSEY

Drawing Title
USGS MAP

Project No. 220187002	Figure 1
Date 1/31/24	
Scale 1" = 1000'	
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Project
**COOPER UNIVERSITY
 HEALTHCARE PHASE 1**
 PORTION OF BLOCK No. 1402 LOT No. 1

CITY OF CAMDEN
 CAMDEN COUNTY NEW JERSEY

Drawing Title
**VICINITY
 MAP**

Project No. 220187002	2
Date 1/31/24	
Scale 1" = 500'	
Drawn By RAF	



Legend

- Approximate Site Area
- City of Camden Parcels

Map References: MOD IV Parcels of Camden County, 2023, NJDEP Aerial 2020

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Project
**COOPER UNIVERSITY
 HEALTHCARE PHASE 1**
 PORTION OF BLOCK No. 1402 LOT No 1

CITY OF CAMDEN
 CAMDEN COUNTY NEW JERSEY

Drawing Title
TAX MAP

Project No.
220187002

Date
1/31/24

Scale
1" = 250'

Drawn By
RAF

Figure
3



Legend

Approximate Site Area



Map References: NJDEP Aerial 2020

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Project
**COOPER UNIVERSITY
 HEALTHCARE PHASE 1**
 PORTION OF BLOCK No. 1402 LOT No 1

CITY OF CAMDEN
 CAMDEN COUNTY NEW JERSEY

Drawing Title
**AERIAL
 PHOTOGRAPH**

Project No.
220187002

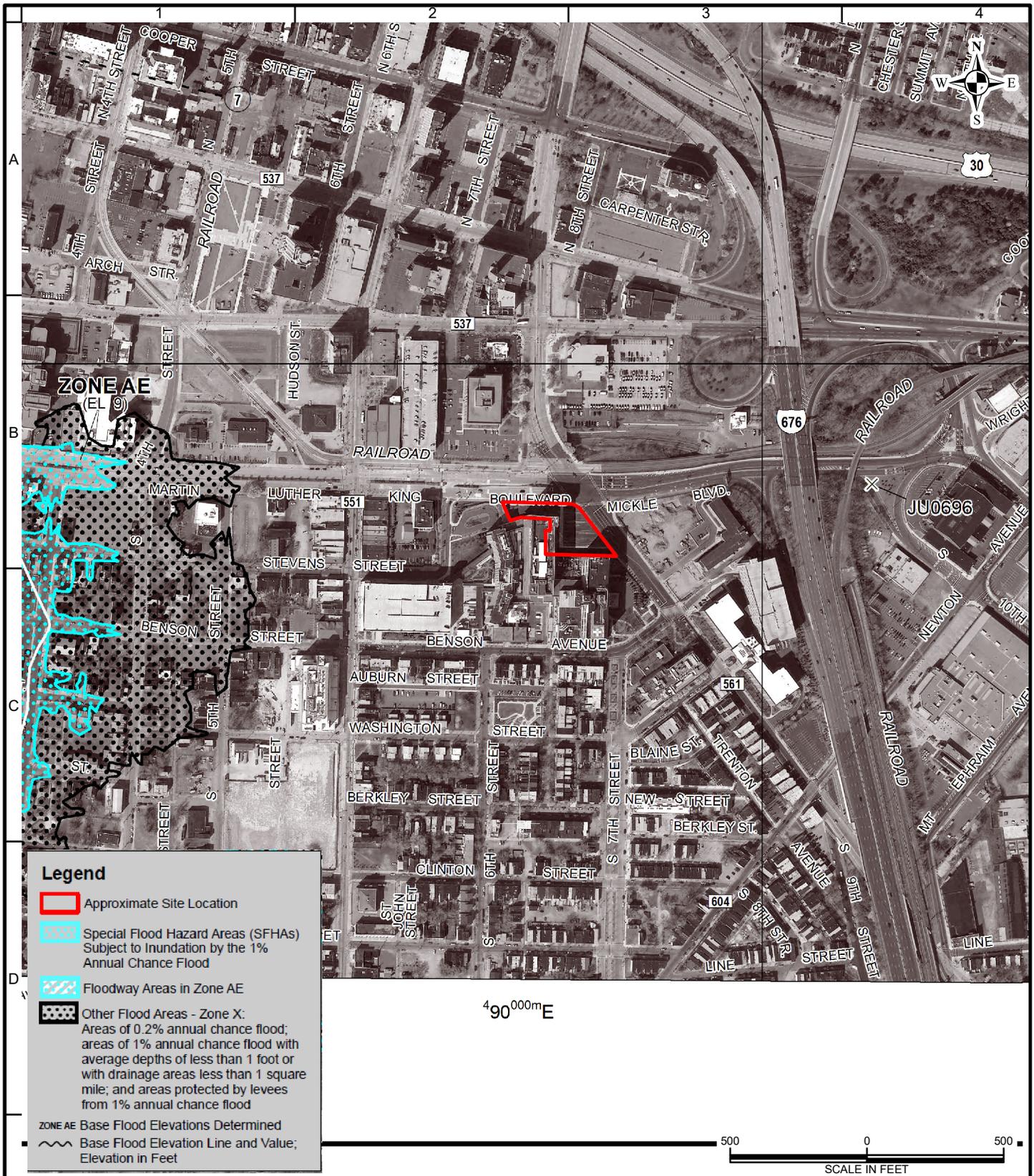
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Figure
4

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Legend

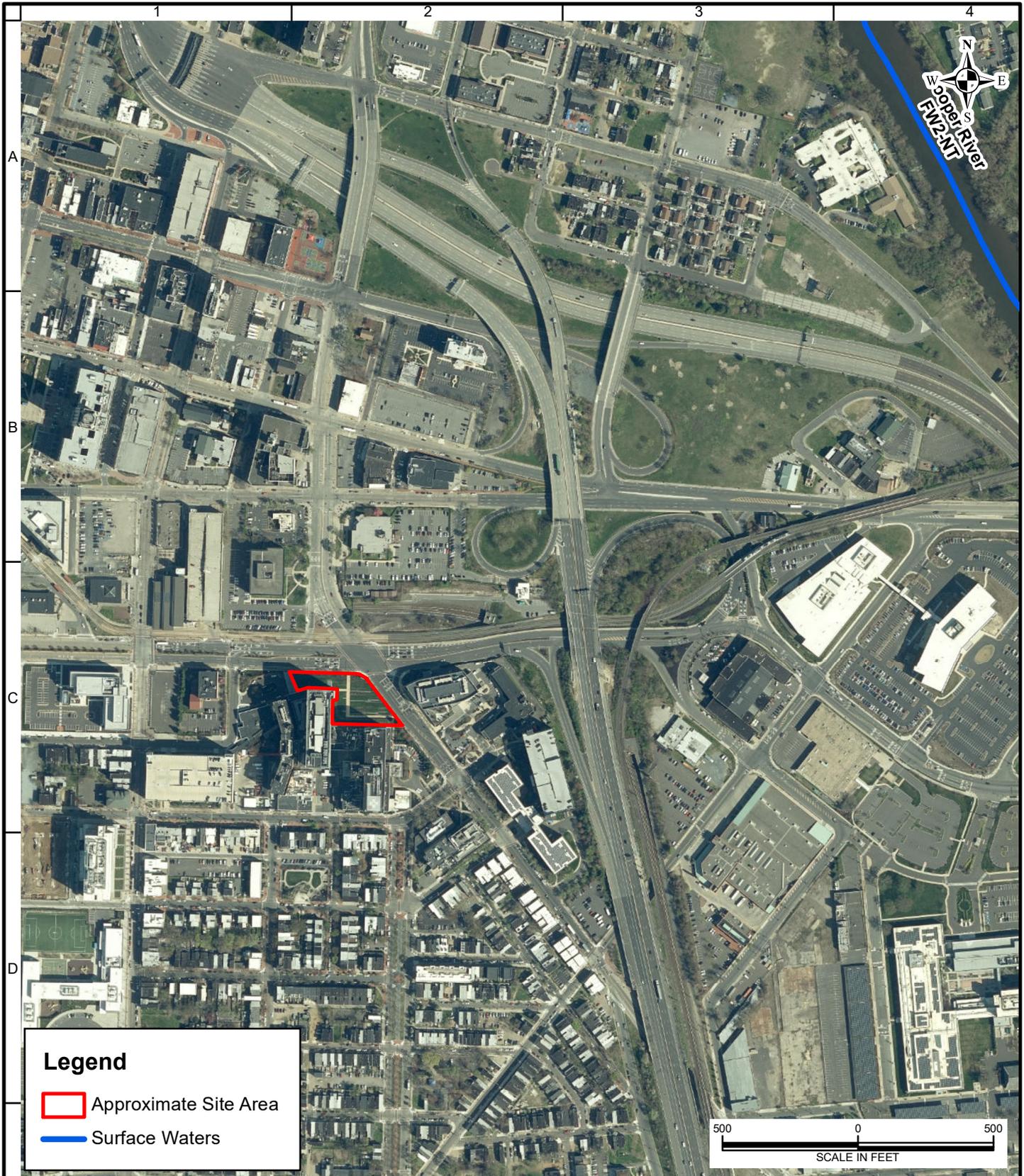
- Approximate Site Location
- Special Flood Hazard Areas (SFHAs) Subject to Inundation by the 1% Annual Chance Flood
- Floodway Areas in Zone AE
- Other Flood Areas - Zone X: Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood
- ZONE AE Base Flood Elevations Determined
- Base Flood Elevation Line and Value; Elevation in Feet

490,000mE



Map References: FEMA Effective Flood Insurance Rate Map, Camden County, Panels 28 and 29 of 305. Map Number: 34007C0028F and 34007C0029F. Map revised August 17, 2016

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Date 1/31/24	5									
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Map References: NJDEP Surface Water Quality Standards GIS Data (2011), NJDEP Aerial 2020

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Project
**COOPER UNIVERSITY
 HEALTHCARE PHASE 1**
 PORTION OF BLOCK No. 1402 LOT No 1

CITY OF CAMDEN
 CAMDEN COUNTY NEW JERSEY

Drawing Title
**NJDEP
 SURFACE
 WATERS
 MAP**

Project No.
 220187002

Date
 1/31/24

Scale
 1" = 500'

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Figure
6



Legend

- Approximate Site Area
- NJDEP Freshwater Wetlands

Map References: NJDEP 2012 Freshwater Wetlands Lower Delaware Subbasin Index, NJDEP Natural Color 2020

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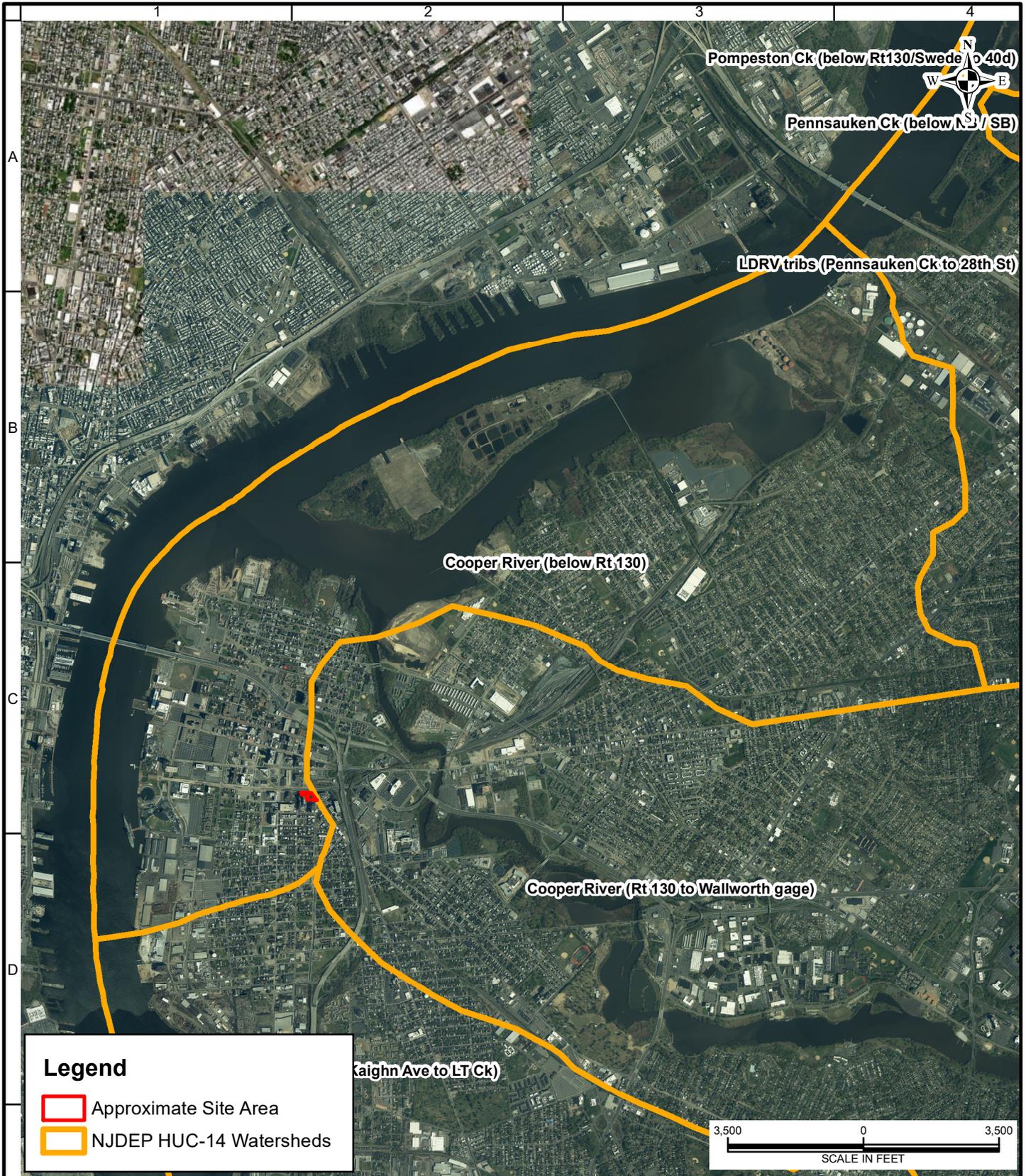
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Project
**COOPER UNIVERSITY
 HEALTHCARE PHASE 1**
 PORTION OF BLOCK No. 1402 LOT No 1
 CITY OF CAMDEN
 CAMDEN COUNTY NEW JERSEY

Drawing Title
**NJDEP
 WETLANDS
 MAP**

Project No. 220187002	7
Date 1/31/24	
Scale 1" = 500'	
Drawn By RAF	



Legend

- Approximate Site Area
- NJDEP HUC-14 Watersheds

Map References: NJDEP Aerial 2020, Esri World Imagery 2023, NJDEP HUC-14 Watershed GIS Data (2011)

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**COOPER UNIVERSITY
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 PORTION OF BLOCK No. 1402 LOT No 1

CITY OF CAMDEN
 CAMDEN COUNTY NEW JERSEY

Drawing Title
**HUC-14
 WATERSHED
 MAP**

Project No.
220187002

Date
1/31/24

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Figure
8



Legend

- Approximate Site Area
- Sewer Service Area

Map References: NJDEP Aerial 2020, NJDEP Sewer Service Area 2023

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Project
**COOPER UNIVERSITY
 HEALTHCARE PHASE 1**
 PORTION OF BLOCK No. 1402 LOT No 1

CITY OF CAMDEN
 CAMDEN COUNTY NEW JERSEY

Drawing Title
**NJDEP
 SEWER
 SERVICE AREA
 MAP**

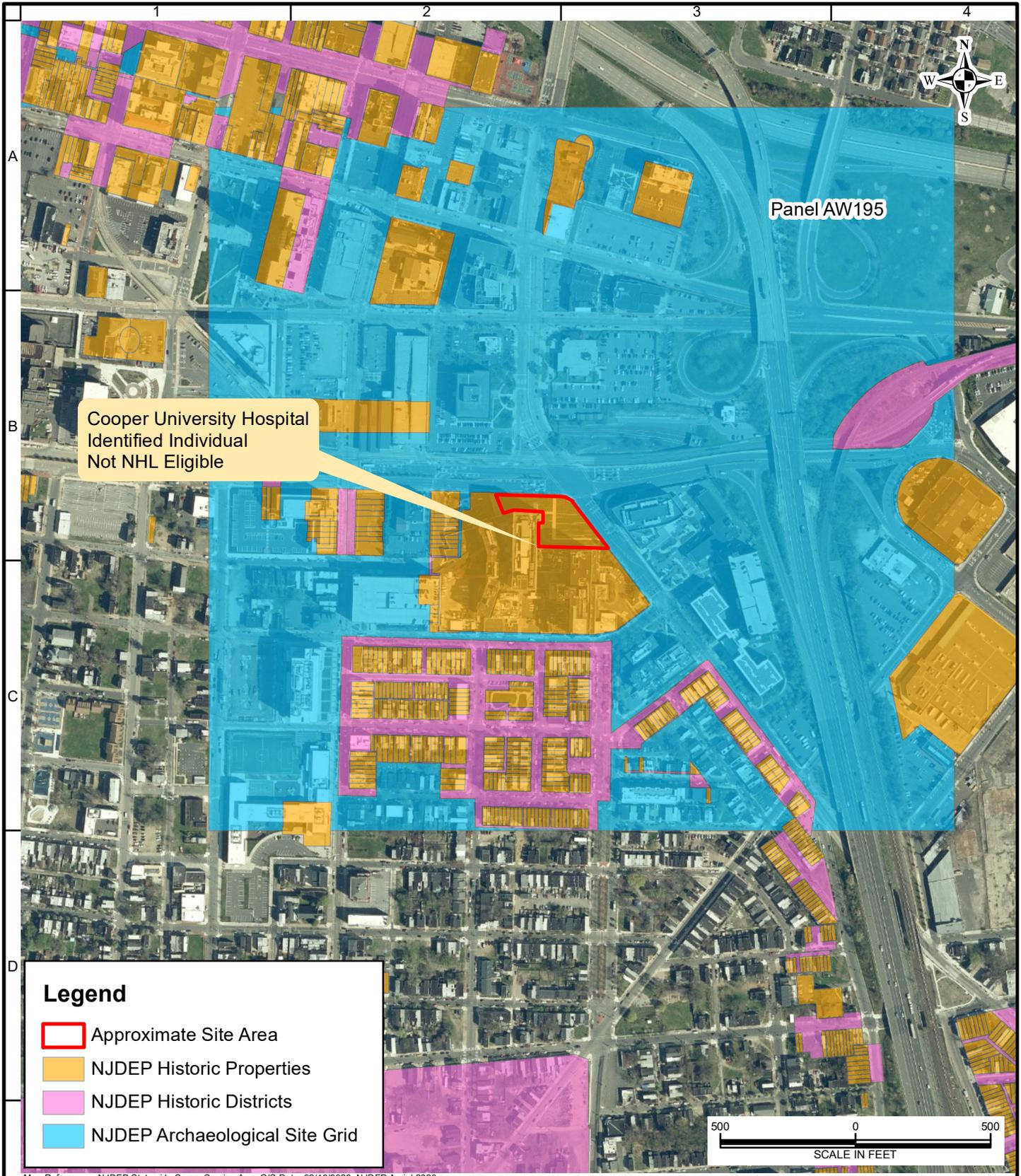
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Figure
9



Cooper University Hospital
Identified Individual
Not NHL Eligible

Panel AW195

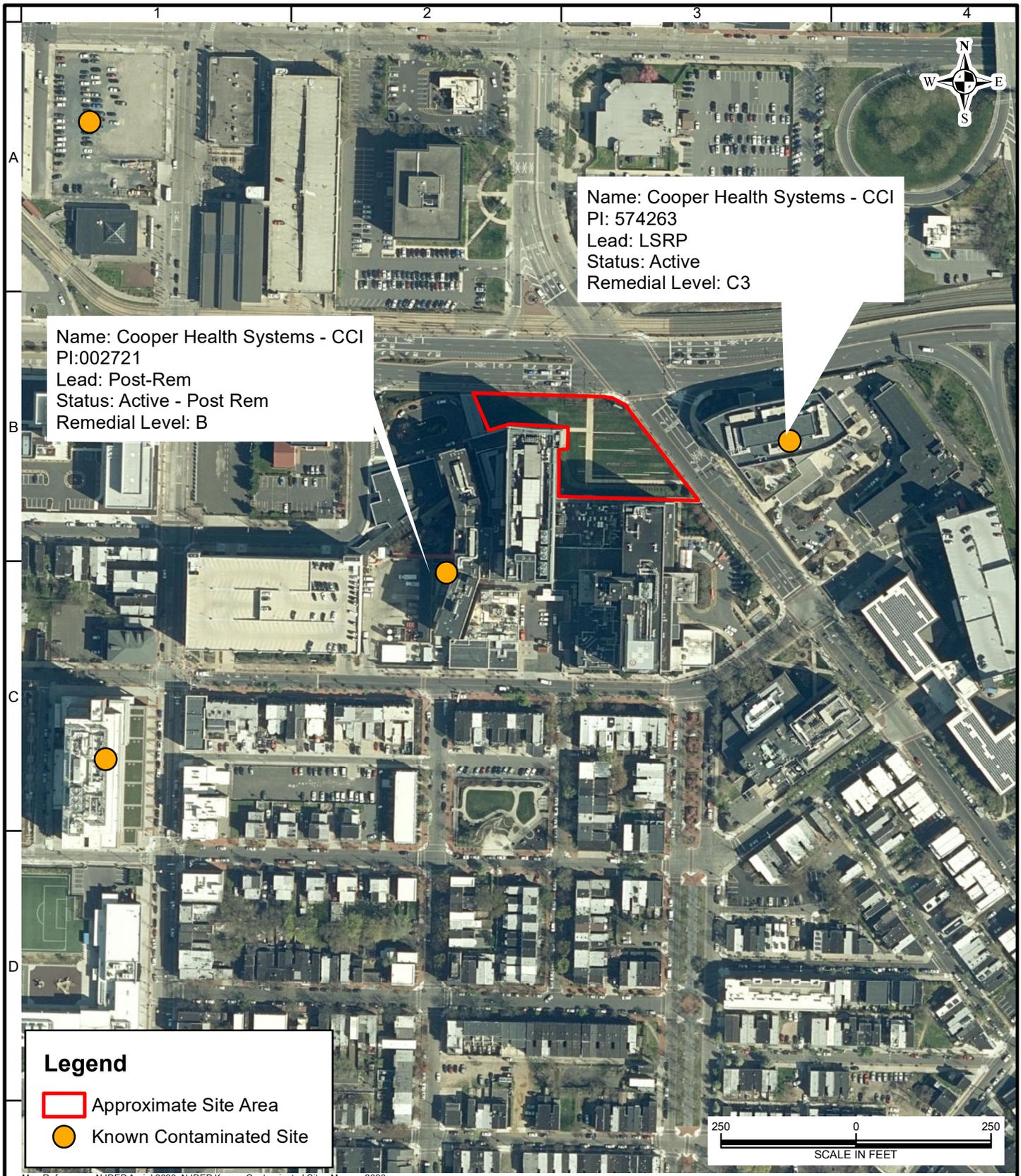


Legend

- Approximate Site Area
- NJDEP Historic Properties
- NJDEP Historic Districts
- NJDEP Archaeological Site Grid

Map References: NJDEP Statewide Sewer Service Area GIS Data, 02/10/2023; NJDEP Aerial 2020

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			<p>Figure</p> <p style="font-size: 2em;">10</p>



Map References: NJDEP Aerial 2020, NJDEP Known Contaminated Sites Mapper 2023

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