

NJ Department of Environmental Protection
Division of Land Use Regulation
P.O. Box 420, Code 501-02A
Trenton, NJ 08625
Attn: Township of Neptune Supervisor

December 15, 2020

RE: NJDEP CAFRA INDIVIDUAL PERMIT
Block 101, Lot(s): 3 & 4, Parts of Lot 2 and 5 and
End of Beach Avenue
NJ DEP File No. 1334-04-007.2; LUP200001

Dear Sir/Madam:

Please accept this comment from the Ocean Grove Home Owners' Association ("OGHOA") regarding the above CAFRA application. A foundational goal of OGHOA is to "protect and enhance property values and the quality of life in Ocean Grove." With these goals in mind, OGHOA has actively monitored the proposed development of the North End site bordered by Wesley Lake, the Boardwalk, Spray Avenue and Beach Avenue in Ocean Grove, since the project was first announced.

Our membership is in broad agreement that the area the Applicant seeks to develop is an eyesore in need of improvement. We do not comment to support or oppose this application. Rather, we comment to highlight concerns and inconsistencies that are apparent to those of us who live in Ocean Grove and have viewed the site of the proposed development before and after Superstorm Sandy, and before and after a fire that resulted in the demolition of the structure at 4 Boardwalk, on the east side of the boardwalk, across from the proposed development. We also comment to express concerns about the possibility that the proposed underground parking will flood, perhaps regularly, and cause residents of the new development to park on existing roadways, thus exacerbating our existing parking problems.

We have noticed inconsistencies in the use and description of the pavilion building at 4 Boardwalk that was destroyed by fire, as well as inconsistencies regarding the dunes on the east side of the boardwalk, and the likelihood of flooding from Wesley Lake.

1. Pavilion at 4 Boardwalk

As the Applicant notes on p. 2 of its Summary and Site Introduction (the "Summary"), the pavilion that occupied the east side of the boardwalk was destroyed by fire on September 14, 2019. The Applicant lists the pavilion as a building "to be replaced" and notes that it is not part of the present application. Summary at p. 31. Whether and when the pavilion building will be replaced is an open question. The Applicant does not control the pavilion site, and it sits in a VE zone. Relying upon Figure 6, "Site Location on 2019 Aerial with FEMA FIRM mapping overlay", which was created before the building burned down, the pavilion was in a VE zone. Before it was

destroyed by fire, the pavilion was partially destroyed in Superstorm Sandy and subsequently rebuilt. Photographs of the damage to the pavilion resulting from Sandy include water damage from back to front, with the most serious damage on the east side of the building. See photographs 1-8, attached.

Several figures and aerial photographs supporting the application show the now-destroyed pavilion building. These figures and photographs include:

- A. Figure 4, Site Location on 2019 Aerial with NJDEP mapped soils overlay;
- B. Figure 5, Site Location on 2019 Aerial with NJDEP landscape mapping overlay; and
- C. Photo 15.
- D. Only site Photos 1 and 4 in the Summary accurately reflect that the pavilion at 4 Boardwalk has been demolished.

2. Dunes

- A. Figure 7, Site Location on 2019 Aerial with FEMA FIRM Mapping Overlay, reflects that there are “wetlands”, which are the dunes along the east side of the boardwalk, and that these dunes stop south of the southern end of the now-demolished pavilion building.
- B. It is accurate that there are no dunes currently located in the space previously occupied by the pavilion, but less than accurate to suggest that existing dunes would protect most of the planned development. Photos 6 and 14 in the Summary illustrate that the existing dunes stop well before the site of the pavilion.

3. Bulkhead along the South Side of Wesley Lake

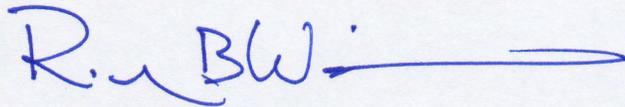
- A. The Summary included with the CAFRA application provides: “The Preliminary FIRM shows the edge of the Wesley Lake wall to be within Zone AE and having a flood hazard elevation of 10 and 11 along the wall.” Summary p. 33.
- B. Applicant’s September 22, 2020 Wave Analysis letter provides: “FEMA’s flood insurance rate map for Lake Wesley (FEMA 2009) shows a 100-year water level of +9.0 feet NAVD88 datum. The lowest elevation of the flood wall on the Ocean Grove side of the lake is +12.1 feet. Consequently, flooding from Lake Wesley will not occur....”

OGHOA does not have the technical expertise and information to address these statements, but see the photographs of damage to the Wesley Lake wall, near the southeast border of the site, as a result of Super Storm Sandy. Photographs 9 and 10, attached.

The CAFRA application seeks to include, within the site, a 140-space parking lot "covered by the podium deck" to serve the proposed 40 room hotel, 39 condos and ten detached single-family residences. This parking structure is essentially an underground parking lot which may be subject to flooding based upon its proximity to both the Atlantic Ocean and Wesley Lake. We take no position regarding whether and/or how often the proposed underground parking lot is likely to flood. We are, however, concerned that if residents of the proposed development believe that it might flood, they will move cars out of the parking lot included in the development and onto Ocean Grove streets. That would exacerbate our parking problems and contravene the requirements for adequate parking set forth in the Residential Site Improvement Standards (RSIS) for new developments that apply to this project because they are included in the Redevelopment Plan approved by Neptune Township on March 24, 2008.

DEP's consideration of our comments is appreciated.

Sincerely,



Richard Williams, on behalf of the
Board of Trustees of the
Ocean Grove Home Owners' Association



Photo 1



Photo 2



Photo 3



Photo 4



Photo 5



Photo 6



Photo 7



Photo 8



Photo 9

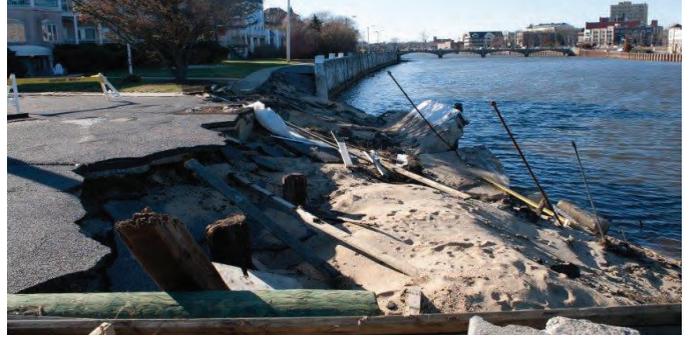


Photo 10