



*adams, rehmann & heggan*  
associates, inc.  
reply to hammonton

April 23, 2009

**CERTIFIED RETURN RECEIPT**

Benjamin Spinelli, Executive Director  
State of New Jersey  
Department of Community Affairs  
Office of Smart Growth  
101 South Broad Street, 7<sup>th</sup> Floor  
PO Box 204  
Trenton, NJ 08625-0204

RECEIVED  
2009 APR 27 P 4:13  
NJ DEPT OF  
COMMUNITY AFFAIRS  
OFFICE OF SMART GROWTH

**Re: Little Egg Harbor Township Site / Coastal Planning Designation**  
**Sydney Krupnick Realty Application**  
**Blue Comet, LLC – Approved Age-Restricted Residential Project**  
**Block: 286, Lots: 3, 5 & 6**  
**Block: 287, Lot: 7**  
**Center Street Area**  
**Little Egg Harbor Township, Ocean County**  
**ARH #50-51548**

Dear Mr. Spinelli:

As agents for the Owner/Applicant for the referenced project, Sydney Krupnick Realty, we are submitting this information in support of our position that the referenced parcels should continue to be designated as Coastal Town/Suburban Planning Areas as opposed to a redesignation to an Environmentally Sensitive Coastal Planning Area.

The site can generally be described as an Oak-Pine uplands occupying a high landscape position having a deep, well-drained soil profile. The overall site area, which comprises ±147.11 acres, has only 2.78 acres or 2% of the entire tract verified by the NJDEP as regulated wetlands and associated transition areas.

A four hundred eight (408) unit, age-restricted housing project has already been approved for the site, designed consistent with local zoning criteria, Coastal Policies, as well as applicable provisions of the Residential Site Improvement Standards. All required local approvals, as well as the project CAFRA Permit #1516-03-0049.1, remain valid.

From a utility service perspective, it is situated within the future Sewer Service Area as designated in the current Ocean County Water Quality Management Plan. All procured local,

regional and State utility connection and construction permits remain valid, inclusive of Little Egg Harbor Municipal Utilities Authority, Ocean County Utilities Authority, and New Jersey Department of Environmental Protection permits for water and sanitary sewer service.

From a land use perspective as noted on the attached 2007 aerial, clearly, the site can be defined as "infill". It is served on adjacent Mathistown Road by fixed route transit service and is in direct proximity to existing / proposed shopping facilities, public uses, including the Little Egg Harbor Branch of the Ocean County Library system and Southern Ocean County Health Center. From a highway access perspective, the approved age-restricted project proposes direct access to Center Street (Ocean County Route #101), as well as comprehensive improvements to provide access / egress utilizing NJSH Route 9. Conditions of the Planning Board's Major Subdivision Approval include:

- construction of a direct connection to Route 9 forming the "fourth leg" of the intersection which will serve the approved WalMart facility situated directly adjacent to the west side of this State highway;
- extension of Otis Bog Road to directly connect the project via a boulevard-type roadway with the Cranberry Creek project providing a direct connection between Route 9 and Center Street.

These improvements are noted on the project Layout Plan attached.

In summary, if the objectives of the State Plan's regional planning effort within the designated Coastal Towns/Suburban Planning Areas are to:

- Conserve the State's Natural Resources and Systems;
- Protect the Overall Environment;
- Provide Adequate Public Facilities and Services at a Reasonable Cost;
- Provide Adequate Housing at a Reasonable Cost;
- Ensure Sound and Integrated Planning.

Redesignation to PA-5, which mandates primarily preservation through a 3% maximum impervious cover requirement, will do exactly the opposite.

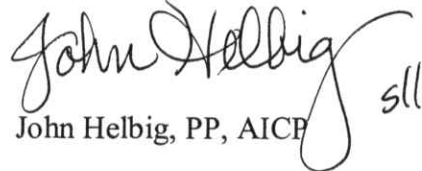
The site, and noted project in particular, represents a fiscally sound proposal in an uplands, infill situation generating ±30% coverage, absent adverse environmental impacts, which also includes several major transportation system improvements financed completely by the Applicant. Its development, to be serviced by existing infrastructure with capacity, will allow a sustainable design where future residents will be able to avail themselves of travel modes such as walking and biking to reach both on-site amenities, as well as nearby shopping and

institutional uses within the neighborhood. Redesignation will simply push future demands for housing, especially in the age-restricted category, onto more marginal and peripheral sites where access to private vehicles and costly extensions of utilities are a necessity.

The approved project meets or exceeds all listed locational planning criteria in the State Plan as currently designated.

Should you have any questions, please don't hesitate to contact me directly at (609) 561-0482, Ext. #147, or via e-mail at [jhelb@arh-us.com](mailto:jhelb@arh-us.com).


Sincerely,

  
John Helbig, PP, AICP sll

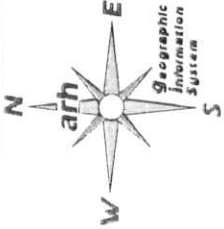
Enclosures

cc: Ed McKenna, Chair, State Planning Commission, Office of Smart Growth  
David McKeon, Senior Planner, Ocean County Planning Department  
Sydney Krupnick, Owner/Applicant  
Michael J. Gross, Esq.  
Ronald N. Curcio, PE, Project Engineer

JH/sll  
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Civil Solutions  
a division of ARH



County - Ocean  
Township - Little Egg Harbor  
Block - 286 / 287  
Lots - 3, 5 & 6 / 7  
Street Frontage - Center Street  
Drawn by: SKR Dated: 2/23/04


Legend



Property in Question

Acquisition Date: 03/14/1995

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Feet

DIGITAL ORTHO  
QUARTER QUAD MAP  
New Gretna, NJ Quadrangle #146  
Tuckerton, NJ Quadrangle #147

Note:  
This map was developed using New Jersey Department of Environmental  
Protection Geographic Information System digital data, but this secondary  
product has not been verified by NJDEP and is not state-authorized.  
ARH Project # 50-51548

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