

November 13, 2025

Britta Forsberg
Executive Director
Barnegat Bay
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Toms River, NJ 08753

Email: britta@savebarnegatbay.org
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**RE: Expert Review Services
Venue at Summer's Corner, Lennar Homes
Block 286 Lots 3, 5 & 6 Block 287 Lots 5 & 7
Little Egg Harbor Township, Ocean County, New Jersey**

Dear Ms. Forsberg,

At your request, this office has conducted a technical review of the land development application located in Little Egg Harbor Township, Ocean County, New Jersey. Our review was specifically focused on the project's compliance with applicable state and municipal stormwater management regulations.

The following application materials were made available and considered during our review:

- Plan entitled, "Site Plan for Lennar" by Caroline Feigin, Adams, Rehmann, & Heggan Associates, Inc, dated May 30, 2025.
- Plan entitled, "Preliminary & Final Major Site Plan & Subdivision, Block 286, Lots 3, 5 & 6 and Block 287, Lots 5 & 7, Tax SHT. #17 & 21, Little Egg Harbor Township, Ocean County, New Jersey for Venue at Summers Corner" by Caroline Feigin, Adams, Rehmann, & Heggan Associates, Inc, dated July 25, 2025.
- Report entitled, "Stormwater Management Report for Venue at Summers Corner Major Subdivision and Site Plan" by Caroline Feigin, Adams, Rehmann, & Heggan Associates, dated April 25, 2025, last revised July 25, 2025.

The application proposes the construction of an age-restricted 415-unit residential community and apartments at Summer's Corner located on Block 286 Lots 3, 5 & 6 Block 287 Lots 5 & 7 in Little Egg Harbor Township. The project site is located within two (2) zoning districts as designated by Little Egg Harbor Township Zoning Map, the General Business Zone (GB), a 10.45-acre portion of the site located just south of US Route 9, and the R-150 Residential Zone on the remaining ±136 acres. The entire property is to be developed under the planned retirement community (PRC) conditional use requirements of





the R-150 Zone as permitted by the split zoning provisions of the Little Egg Harbor Township Ordinance. Our findings with respect to Stormwater Management at the proposed residential development are detailed in the following sections.

Executive Summary

The application fails to meet the minimum standards of N.J.A.C. 7:8 for Water Quantity, Water Quality, and Groundwater Recharge including the following significant deficiencies:

- The entire design is based on an outdated survey that shows inaccurate conditions.
- The drainage areas and points of analysis are not delineated per the requirements of N.J.A.C. 7:8-5.6 resulting in the proposed design diverting a new 30+ acre drainage area into the Tuckerton Creek tributary that flows into Holly Lake.
- The diverted drainage area results in significantly increased runoff to the Tuckerton Creek tributary that flows into Holly Lake, which will create impacts to the numerous existing and occupied homes along Sweetwater Drive, Vincent Court, Pier Point, and other local streets.
- No verification of the NJDEP Flood Hazard Area for Willis Creek along Stonegate Dr. is provided, nor have the project's impacts to this area been assessed.
- No Hydrology and Hydraulics (H&H) analysis was performed to assess the downstream flooding impacts to the numerous homes and properties downstream of the site as a result of the deficiencies in the current design, many of which are already subject to significant and frequent flooding risk and would be impacted by any additional runoff.
- The stormwater report utilizes incorrect rainfall distributions, land cover, and precipitation depths and the stormwater model does not account for large upstream drainage areas and the storage volume in the adjacent sand mines, all of which leads to under-designed BMPs.
- Several of the proposed basins do not meet green infrastructure design requirements and most of the infiltration basin designs lack the required Groundwater Mounding calculations to prove that the basins will adequately perform their stormwater management functions.
- The design does not meet the groundwater recharge requirements due to the improper use of a large-scale infiltration basin in the groundwater recharge calculations.

General Comments

1. No current survey appears to have been provided with the application. However, the plans claim:

OUTBOUND TAKEN FROM A PLAN ENTITLED "ALTA/NSPS SURVEY PLAN FOR BLOCK 286, LOTS 3, 5 & 6 AND BLOCK 278, LOTS 5 & 7, VENUE AT MYSTIC ISLAND" PREPARED BY ADAMS, REHMANN & HEGGAN ASSOCIATES, INC. DATED AUGUST 2024, LAST REVISED 09/26/2024. TOPOGRAPHIC INFORMATION TAKEN FROM A PLAN ENTITLED "TOPOGRAPHIC SURVEY PLAN FOR BLOCK 286, LOTS 3, 5 & 6 AND BLOCK 278, LOTS 5 & 7, VENUE AT MYSTIC ISLAND" PREPARED BY ADAMS, REHMANN & HEGGAN ASSOCIATES, INC. DATED AUGUST 2024

While these plans were not provided for review, the underlying survey features and topography are clearly not from 2024, as the plans do not show the existing Tractor Supply and Walmart

developments or the supporting access roads on N.J.S.H. Route 9, which were under construction as of 2015. The plans also lack several structures on adjacent lots including at least seven homes on Leitz Blvd. and even some features within the property in question. Some of the missing homes existed prior to 2006, making this information nearly twenty years out of date. The topography in these areas is also not consistent with the conditions in 2024. The entire submission is therefore based on outdated and inaccurate survey information that does not accurately reflect the current conditions near and within the site. The following figures show the applicant's existing conditions plan contrasted with an NJGIN 2020 aerial of approximately the same location with GIS parcel lines and annotations shown.

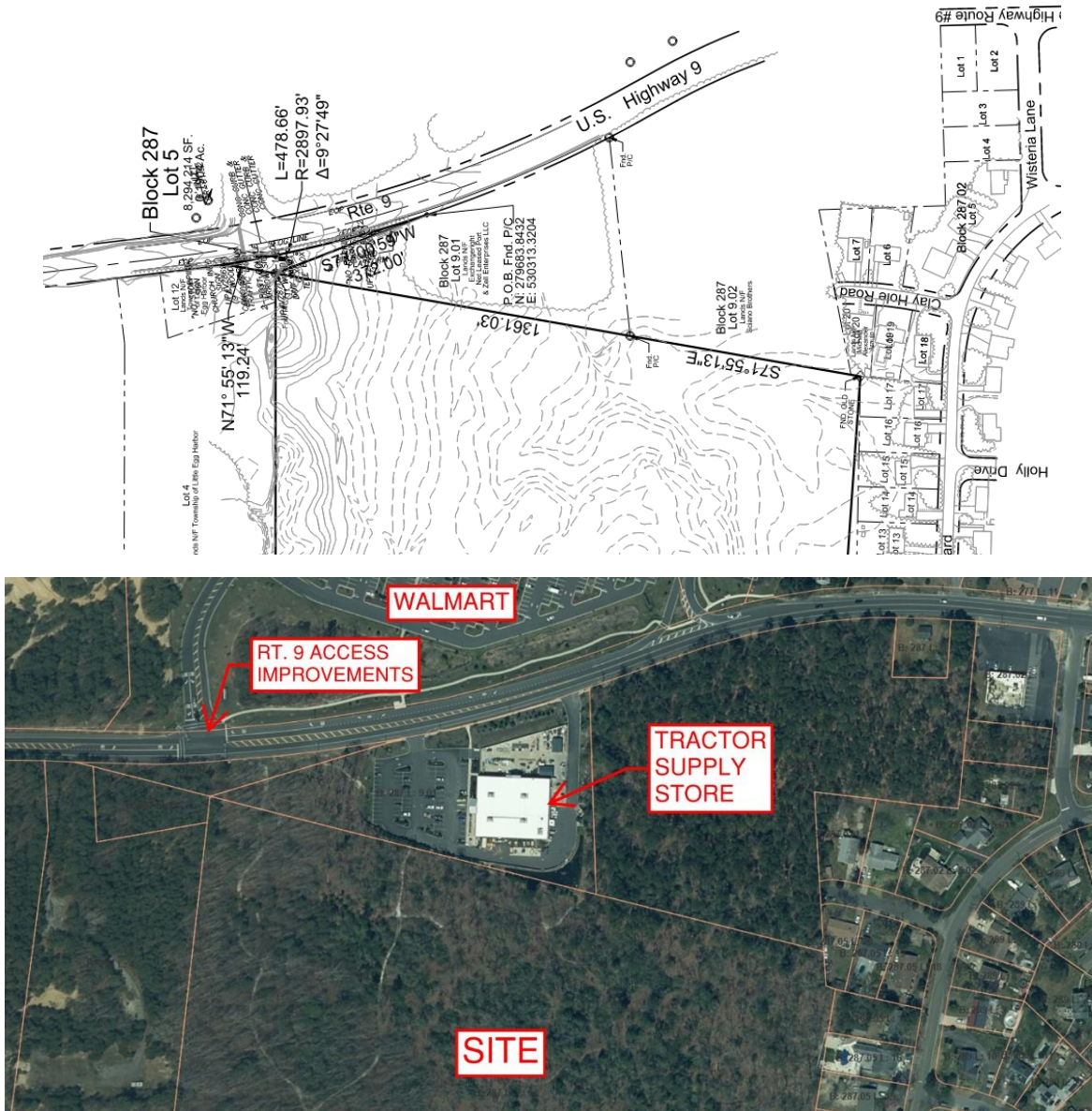


Figure 1. Comparison of existing conditions plan (top) and recent aerial imagery (below).

2. A plan for a proposed future road connection to N.J.S.H. Route 9 was provided with the application. This road appears to go nowhere, and a potential missing connector would require

easements from at least four lots. This proposed road intersects Basins 35 and 36. The design for the proposed “Road A” extension is nonsensical as can be seen in the figure below taken directly from the application plan set.

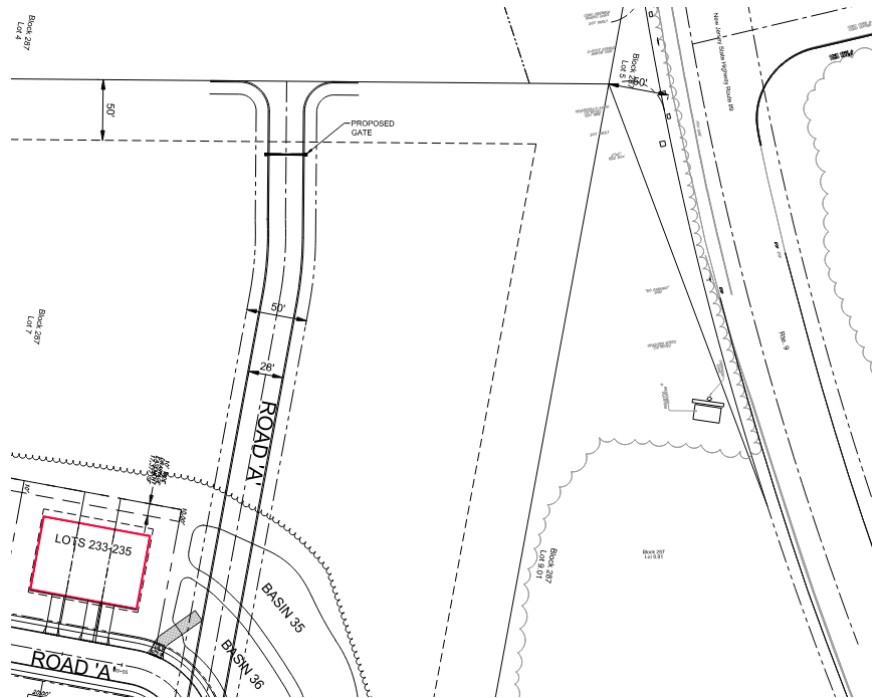


Figure 2. Plan showing proposed Road 'A' extension.

3. A Maintenance plan for stormwater management measures has not been provided with the application. This is required by N.J.A.C. 7:8-5.8 to ensure the continued operation of the stormwater management system. The absence of this plan also makes the person responsible for maintenance and the liability for long-term system failure unknown.
4. The plans do not provide engineering details for the design elements of each individual basin, which are required to assess compliance. The document contains a “typical section” for a basin, outlet structures, and spillways but they do not indicate to which basins and structures these typical sections apply to. The sections displayed are not to scale and no elevations are shown, thus they do not provide any useful information to assess compliance.

Stormwater Management

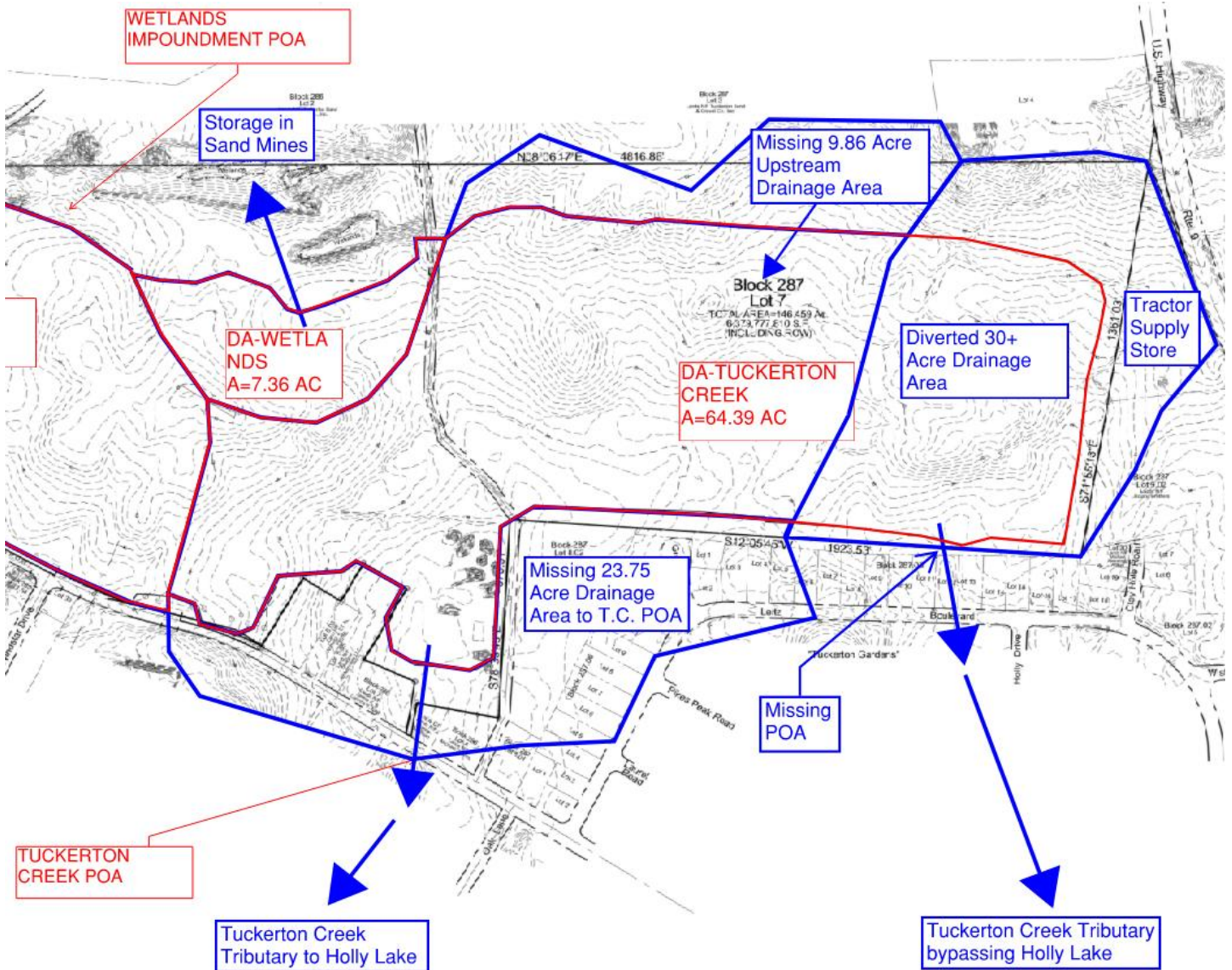
The project is subject to and claims to be compliant with the Stormwater Management and Green Infrastructure rules (N.J.A.C. 7:8). Additionally, the entire site is located within a CAFRA Zone (Coastal Suburban Planning Area within a sewer service area, PA-2) therefore the site is also subject to compliance with the requirements of NJAC 7:7. The requirements of N.J.A.C. 7:8 are broadly divided into three primary categories Water Quantity, Groundwater Recharge, and Water Quality as reflected below.

Modeling Methodology, Green Infrastructure Design, and Water Quantity

1. The analysis uses only two points of analysis (POA) for the watersheds of Tuckerton Creek and Willis Creek, where more POAs are needed to assess the existing condition accurately as described below based on the applicant's drainage area map. The applicant's approach



ignores many locations where stormwater runoff leaves the property. NJAC 7:8-5.6(c) states that "The stormwater runoff quantity standards shall be applied at the site's boundary to each abutting lot, roadway, watercourse, or receiving storm sewer system." The following figures show the applicant's drainage area map including the submitted drainage areas in their original red color with corrected drainage areas and points of analysis shown in blue. Please note this figure relies on the topography provided by the applicant.



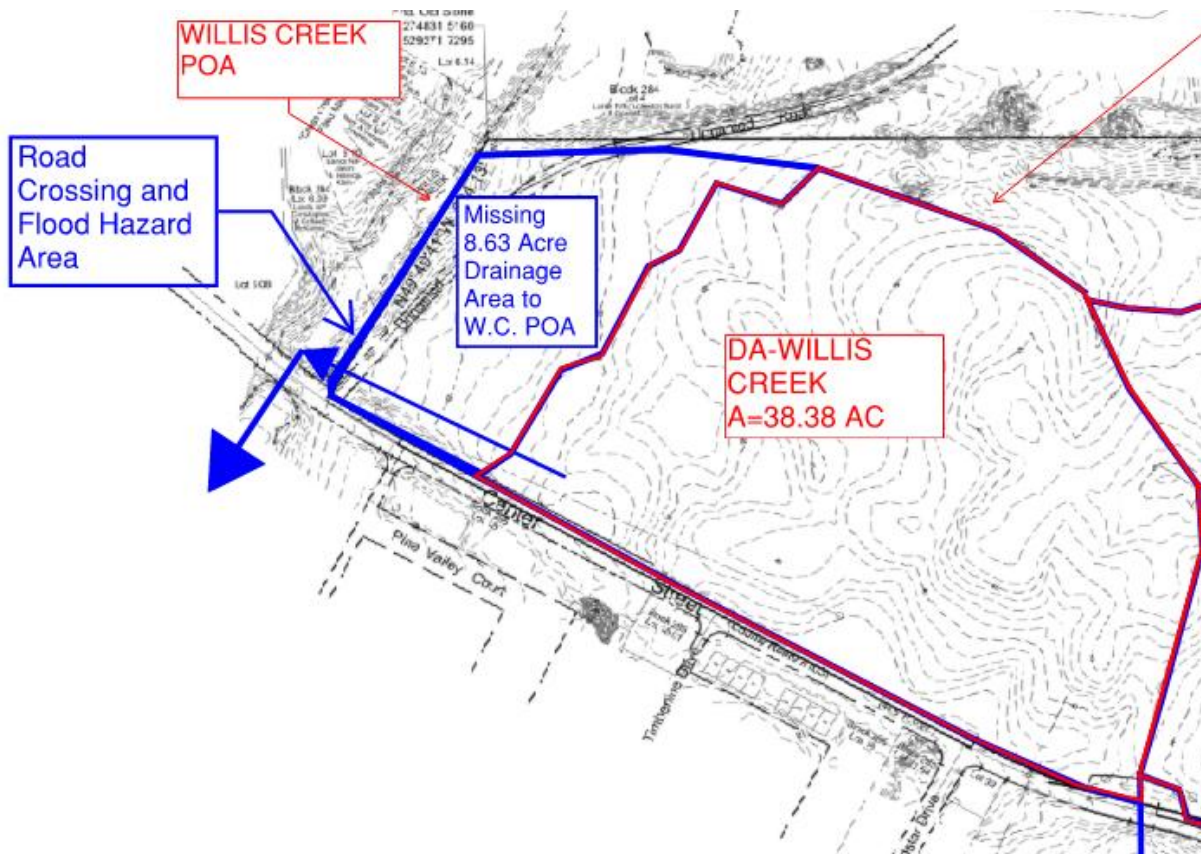


Figure 3. Drainage area mapping with additional annotations shown in blue.

2. There is an area of over 18 acres of land that is currently routed to the Tuckerton Creek POA, where the grades in the existing condition demonstrate that this runoff takes an entirely different route across Leitz Blvd. and into a different tributary to the Tuckerton Creek than the remainder of the area. This area requires another POA for analysis purposes. Additionally, there is a significant upstream drainage area that is not accounted for in this location, including possibly the stormwater outfall from the Tractor Supply store, which is entirely missing from the plans, bringing the total drainage area that is incorrectly analyzed to over 30 acres. This artificially inflates the permitted flowrate at the applicant's Tuckerton Creek POA, which puts all the properties downstream of that outfall at significant risk of increased flooding as a result of this application. More importantly, the proposed design intentionally diverts this 30+ acres of drainage area from one tributary to an entirely different tributary of Tuckerton Creek. This has direct impacts to the flooding characteristics of the tributaries as well as impacts to the hydrology of both of the receiving waterbodies.
3. The analysis does not account for over 33 total acres of drainage area that contributes to the Tuckerton Creek POA located both on the property in question and on adjacent lots including approximately 10 acre that is upstream drainage area. There are also more than eight (8) acres of drainage area that contributes to the Willis Creek POA that is not accounted for. Upstream drainage areas are required to be accounted for per Chapter 5 of the BMP Manual. The conveyance structures, overflow, and erosion control structures within the basins that are downstream of these upstream drainage areas therefore have not been sized using the actual conditions at the site. Due to this omission, the conveyance structures are likely to be significantly



undersized and thus not able to accommodate the actual flow conditions in larger storm events. Additionally, the proposed conveyance system will redirect flow from portions of this area that currently drain across Leitz Boulevard to the Tuckerton Creek POA, which compounds the issue noted above and will result in additional runoff at the Tuckerton Creek POA that has not been calculated in the stormwater management report.

4. The 7+ acre “DA-wetlands” drainage area in the report is routed to the Willis Creek POA, where in reality it discharges to the large former sand mines west of the site. The closed topographic depression storage in these mines has so much volume and permeability that it is unlikely that flow would ever reach Willis Creek. As these conditions are not reflected in the stormwater management report the permitted flowrate at the Willis Creek POA is inflated beyond what the regulations permit. With respect to this condition, NJAC 7:8-5.7(a)3. States the following:

In computing pre-construction stormwater runoff, the design engineer shall account for all significant land features and structures, such as ponds, wetlands, depressions, hedgerows, or culverts, that may reduce pre-construction stormwater runoff rates and volumes.

5. The unadjusted precipitation depths used in the study were 3.42 inches, 5.33 inches, and 9.20 inches for the 2-, 10-, and 100-year rainfall events, respectively. These values are consistent with Table 5-1 of the NJ BMP Manual which references the defunct county-based method, however the currently adopted version of N.J.A.C. 7:8-5.7 only allows for calculation of precipitation depths using the site-specific NOAA Atlas 14 method. The correct values taken directly from NOAA Atlas 14 at the project site are 3.42 inches, 5.35 inches, and 9.32 inches for the same storm events. All of the calculated values for the 10- and 100-year storm events throughout the entire report are therefore lower than those properly calculated using the compliant precipitation depths.
6. The predevelopment models are using the NOAA Type C rainfall distribution where Type D is required. The post-development models are using Type D, which makes pre- to post-development flowrate comparisons invalid. The applicant must revise the predevelopment models with the Type D rainfall distribution.
7. In the HydroCAD model, a number of watersheds have “Direct Entry” for the time of concentration values. However, calculations on how these direct entry TCs computed were not provided. The applicant should provide these computations or have HydroCAD calculate the TCs by inputting the sheet flow and shallow concentrated variables for each watershed into the program.
8. Most of the proposed stormwater basins are clustered together, many just separated by a single berm. This is contrary to the definition of Green Infrastructure and NJDEP guidance. The basins in close proximity to one another do not qualify as green infrastructure and are therefore not permitted to be used to meet the water quality or groundwater recharge standards.
9. The post-development drainage area map lacks the necessary amount of clarity to conduct a reasonable review of its contents. There is no legend and it is difficult to distinguish between line types. There does not appear to be clear watershed boundaries and flow paths for each of the individual drainage areas.
10. Due to the overlap of the systematic errors above, the majority of the stormwater routing calculations are not valid to assess compliance with the Water Quantity requirements of N.J.A.C. 7:8 and the NJ BMP Manual. As the majority of the errors summarized above would result in an



undersized stormwater management system, the current stormwater management design will be noncompliant with the Water Quantity requirements after the errors are corrected.

11. The existing conditions calculations misrepresent the conditions on this site in a manner that serves to overpredict the amount of runoff under existing conditions. For example, the calculations indicate that 22.1 acres of the site consists of "grass" which the applicant represents with a Curve Number of 39 in Hydrologic Soil Group A areas. On the contrary, the site appears to be entirely forested, which should be represented with a Curve Number of only 30, in the areas where the Hydrologic Soil Group is mapped as 'A'. This over-representation of the existing runoff potential of the site artificially and incorrectly decreases the size of the proposed stormwater management basins which are necessary to comply with the peak flow control requirements.

Groundwater Recharge

1. Per above, several of the basins do not qualify as green infrastructure as designed and are thus not permitted to be used to meet the water quality or groundwater recharge standards. The design relies upon these basins to meet Groundwater Recharge requirements; therefore, the design is not compliant with the Groundwater Recharge requirements of N.J.A.C. 7:8 and the NJ BMP Manual.
2. Basins 3, 18, and 25 were used in the groundwater recharge calculations. According to the stormwater report, Basin 3 is a large-scale infiltration basin. Table 5-1 in N.J.A.C summarizes which BMPs may be used for groundwater recharge. Large-scale infiltration basins are not listed; therefore Basin 3 cannot be used in the recharge calculations. Removing Basin 3 reduces the total recharge volume to 1,063,120 CF which is less than the required 1,872,749 CF volume calculated in the stormwater report, thus the project does not meet the Groundwater Recharge requirement.
3. Ocean Township was selected as township in the groundwater recharge spreadsheet. The project is in Little Egg Harbor Township and therefore the location input is incorrect, which changes the calculations throughout the spreadsheet and the volume required to be infiltrated.

Water Quality

1. According to the HydroCAD model outputs provided, Basin 14 overflows during the water quality storm event. Per Chapter 9.8 of the New Jersey BMP Manual, infiltration basins are required to be sized to contain the entire water quality design storm.
2. Per above, several of the basins do not qualify as green infrastructure as designed and are thus not permitted to be used to meet the water quality or groundwater recharge standards. The design relies upon these basins to meet the Water Quality requirements, therefore the design is not compliant with the Water Quality requirements of N.J.A.C. 7:8 and the NJ BMP Manual.

Groundwater Mounding

1. Mounding calculations were only provided for Basins 1, 4, 5, 6, 8, 9, 12, and 13. The applicant has not supplied the required groundwater mounding calculations for most of the infiltration basins including the largest infiltration basin (Basin 3) and several infiltration BMPs that are utilizing soil replacement.



2. No analysis of groundwater mounding interactions or impacts was provided. Several of the basins are side-by-side, which is the worst-case scenario for interaction of groundwater mounds. There are also wetlands in the vicinity of the site that may be impacted by groundwater mounds.
3. The applicant has not demonstrated that groundwater mounding will not adversely impact the infiltration BMPs at the site, which may result in the failure of the BMPs. Failed infiltration BMPs do not perform their Water Quality, Water Quantity, or Groundwater Recharge functions as they are designed and required to.

Soil Erosion and Sediment Control

1. The SESC shows that a silt fence will be installed along most of the limit of disturbance (LOD) of the proposed apartment complex. However, there is no silt fence line along the LOD that runs parallel to Center Street, which is downhill of nearly the entire disturbed area of the site and therefore is the most critical location for silt fence to be installed.
2. The SESC plans have been provided at a scale (1"=100') that is much smaller than the rest of the plan set (1'=30'), which makes the line types and features on the plans difficult to interpret due to overlapping features and illegible text. The standards for soil erosion and sediment control requires SESC plans to be submitted at the same scale as the site plans and considers a proper scale to be usually not less than 1"=50'.
3. The SESC plans lack contour labels which are needed to assess the effectiveness and proper layout of the SESC measures.
4. The required infiltration failure stability analysis has not been provided.
5. Plans do not contain conduit outlet protection measures and outlet protection calculations were not provided in the stormwater report. The applicant must determine if protection measures are necessary and if so, present calculations on sizing.

Downstream Impacts

1. No Hydrology and Hydraulics (H&H) analysis was performed for the downstream streams, which both have road crossings in close proximity to the site and homes along the streams. Both streams have a mapped FEMA floodplain in the vicinity of the site, and any additional runoff will contribute to increased flooding. Willis Creek contains a mapped FEMA floodway immediately downstream of the site and the portion of Willis Creek adjacent to the site is an area which is unmapped by FEMA but will have a NJDEP Flood Hazard Area as the contributory drainage area exceeds 50 acres. A Flood Hazard Area verification was referenced in the application documents for this location; however, this has not been made available for review. The application documents do not reference a Flood Hazard Area Verification for the Tuckerton Creek POA, which also has a contributory drainage area that exceeds 50 acres. Regardless, the applicant is required to perform an analysis for downstream stability to satisfy SESC standards after satisfying all stormwater regulations. The current FEMA Flood Insurance Rate Map is shown below with the site and downstream areas identified. The figure shows numerous homes and properties downstream of the site which would receive additional flooding impacts as a result of the deficiencies in the current design.



Figure 4. Effective FEMA mapping with additional annotations shown in red.

2. The outfall for Basin 26 at the Tuckerton Creek POA may flood downstream existing homes on Sweetwater Drive, Vincent Court, or Pier Point which is a tidal flood hazard area and will thus add to the already elevated risk and frequency of flooding.
3. The proposed Willis Creek outfall is overland and crosses a gravel road which appears to be a public ROW before entering the stream with an NJDEP Flood Hazard Area that is immediately adjacent to Stonegate Drive. This may cause erosion or other issues that have not been assessed, as the applicant has not performed the required downstream stability analysis.

Coastal Zone Management Rules, R.S.I.S., and Local Ordinances

1. As the project meets the definition of major development, N.J.A.C. 7:7-16.6(a) requires that the project comply with the Stormwater Management rules at N.J.A.C. 7:8, which have not been



met per the above comments. The application therefore does not comply with the requirements of the Coastal Area Facilities Review Act.

2. The project is subject to the Residential Site Improvements Standards also known as N.J.A.C. 5:21. N.J.A.C. 5:21 -7 requires compliance with the standards of N.J.A.C. 7:8-5 and 6, which the project has already been found non-compliant with per above comments, therefore the project is also noncompliant with the Residential Site Improvements Standards.
3. Additionally, the application is also not compliant with the Little Egg Harbor Township Stormwater Control Ordinance § 215-12.11, which is required to be enforced per 40:55D-38. 29.b.(14), also known as the Municipal Land Use Law.

Summary

In this letter we have provided brief summaries of the stormwater management and soil erosion and sediment control items which directly impact the application's compliance with the requirements of N.J.A.C. 7:8 and N.J.A.C. 7:7. The current design fails to meet the minimum standards of N.J.A.C. 7:8 for Water Quantity, Water Quality, and Groundwater Recharge. The findings of this office include multiple faults and oversights throughout the submission package that, in combination, will result in tangible impacts to the downstream communities along the Tuckerton and Willis Creeks including the increased risk of flooding from improperly designed stormwater management BMPs, the degradation of water quality through inadequate sediment and pollutant removal, and altered hydrology. Based off the above findings, it is appropriate that the Coastal Area Facilities Review Act Permit Application be deemed incomplete and non-compliant pending comprehensive revision and resubmission of the stormwater design. We respectfully reserve our right to provide additional comments pending potential plan revisions, additional correspondence with either the NJDEP professionals, Little Egg Harbor Township professionals, or the applicant's engineer or any additional application-related documentation.

We appreciate the opportunity to provide you with these consulting engineering services. Please do not hesitate to contact us with any questions regarding this review.

Sincerely,

A handwritten signature in black ink, appearing to read 'Clay Emerson', written in a cursive style.

Clay Emerson PhD PE CFM
Senior Technical Director

A handwritten signature in black ink, appearing to read 'Ryan Krueger', written in a cursive style.

Ryan Krueger PE CME
Project Manager, Water Resources

Enc. (0)

CC: None