



KNPB-R7000

March 6, 2026

*Via Email*

MacKenzie Bittle, Planning Board Secretary  
Borough of Keansburg  
29 Church Street  
Keansburg, NJ 07734

**Re: Preliminary & Final Major Site Plan Application  
for Beachway Avenue Realty, LLC (Critelli)  
Block 184, Lot 1  
Beachway Avenue II Redevelopment Plan Overlay  
B-2 (Mixed-Use Commercial Residential) & CR (Conservation Recreation) Zones  
First Engineering & Planning Review**

Dear Board Members:

As requested, we have reviewed the above-referenced application for a Preliminary and Final Major Site Plan with variances. The applicant submitted the following documents in support of this application:

1. Preliminary/Final Major Site Plan, prepared by Jason M. Fogler, P.E., of MidAtlantic Engineering Partners, LLC, consisting of fifteen (15) sheets, dated May 19, 2025, and last revised on January 15, 2026.
2. Pre- and Post-Development Drainage Area Maps, prepared by MidAtlantic Engineering Partners, LLC, consisting of two (2) sheets, dated May 19, 2025, and last revised on October 14, 2025.
3. Boundary and Topographic Survey – Block 184, Lot 1, prepared by Suzanne E. Warren, P.L.S., of MidAtlantic Engineering Partners, LLC, consisting of one (1) sheet, dated September 1, 2023, and last revised on October 8, 2025.
4. Architectural Floorplans and Elevations, prepared by Thomas J. Brennan Architects, consisting of five (5) sheets, dated January 7, 2026.
5. Application Cover Letter, prepared by Jason M. Fogler, P.E., of MidAtlantic Engineering Partners, LLC, consisting of two (2) pages, dated January 20, 2026.
6. Planning Board Application, consisting of seven (7) pages, signed January 5, 2026.
7. Operations & Maintenance Manual, prepared by MidAtlantic Engineering Partners, LLC, consisting of twenty-eight (28) pages, dated May 19, 2025, and last revised on December 30, 2025.
8. Sanitary Sewer Engineer's Report, prepared by Jason M. Folger, P.E., of MidAtlantic Engineering Partners, LLC, consisting of twenty-four pages, dated March 12, 2024, and last revised on December 30, 2025.
9. Stormwater Management Report, prepared by Jason M. Fogler, P.E., of MidAtlantic Engineering Partners, LLC, consisting of 269 pages, dated May 19, 2025, and last revised on December 30, 2025.
10. Engineer's Report for Water Service Connection, prepared by Jason M. Fogler, P.E., of MidAtlantic Engineering Partners, LLC, consisting of twenty-seven (27) pages, dated March 12, 2024, and last revised on December 30, 2025.

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First Engineering & Planning Review**

11. Environmental Impact Report, prepared by Jason M. Fogler, P.E., of MidAtlantic Engineering Partners, LLC, consisting of sixty-two (62) pages, dated March 12, 2024, and last revised on December 31, 2025.
12. Traffic Engineering Assessment, prepared by A. Andrew Feranda, P.E., P.T.O.E., C.M.E., of Shropshire Associates, LLC, consisting of thirty-nine (39) pages, dated May 16, 2025.
13. Stormwater Management Testing Report, prepared by Geo-Technology Associates, Inc., consisting of fourteen (14) pages, dated April 15, 2025.
14. CAFRA Permit issued by Becky Mazzei (NJDEP), dated November 5, 2025, expiration date November 4, 2030.
15. Will Serve Letter, prepared by Michael Wren, Engineer, of Verizon, consisting of two (2) pages, dated February 12, 2025.
16. Will Serve Letter, prepared by Craig McLeod, Senior Director Construction, of Altice USA East, consisting of one (1) page, dated February 13, 2025.
17. Will Serve Letter, prepared by George F. Salazar of Jersey Central Power & Light, consisting of one (1) page, dated February 15, 2025.
18. Will Serve Letter, prepared by Danielle Simone, Sales Department, of New Jersey Natural Gas, consisting of one (1) page, dated February 13, 2025.
19. Will Serve Letter, prepared by Steven Ussmann, Superintendent, of Keansburg Water and Sewer Department, consisting of one (1) page, dated May 19, 2025.
20. Certified List of Property Owners, prepared by Alex J. Worth, Tax Assessor, of the Borough of Keansburg, consisting of three (3) pages, dated January 13, 2025.

Based on our review and recent site inspection, we offer the Board the following comments and suggestions:

#### **A. Project Description**

The subject property, known as Block 184, Lot 1, consists of approximately 2.65 acres of developable area, and is located along Beachway Avenue. The subject property is split zoned, located partially in both the B-2 (Mixed Use Commercial and Residential) Zone and the CR (Conservation Recreation Overlay) Zone. Additionally, the subject site also comprises the entirety of the Beachway Avenue II Redevelopment Area Overlay, which is governed by the Beachway Avenue II Redevelopment Plan (the "Redevelopment Plan"). Lot 1 is undeveloped and contains asphalt pavement.

The applicant proposes three (3) five-story condominium buildings consisting of a total of 64 residential units. Buildings #1 and #3 will have 20 units each, and Building #2 will have 24 units. All buildings will include individual garages, a lobby, a package room, and a trash room on the ground floor. Additional site improvements include surface parking, landscaping, lighting, utility connections, site grading and offsite improvements. Based on the Preliminary Flood Insurance Rate Maps, dated January 31, 2014, it appears that the site is located in the AE Flood Zone (base flood elevation 12.0'). The proposed First Floor elevation is 13.57 feet.

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## **B. Consistency with the Borough's Master Plan and Redevelopment Plan**

### 1. 2015 Master Plan Reexamination Report and Amendment (Adopted November 9, 2015, via Resolution No. 2015-11)

The following items are goals, objectives and policy statements from the 2015 Master Plan Reexamination Report and Amendment that are relevant to the proposal.

#### Article IV. – Extent to which Such Problems and Objectives Have Been Reduced or Increased Status of 2012 Objectives:

The 2012 Master Plan Reexamination Report reiterated the objectives of the 1988 Master Plan and outlines their status and relevancy in 2012. The current 2015 Master Plan Reexamination Report also reiterates the same objectives and indicates the extent that the objective has been reduced or increased since 2012.

- Page 6, Item 4: Establish appropriate population densities and control the intensity of development to ensure neighborhood, community, and regional well-being and to preserve the natural environment. *The 2015 Master Plan Reexamination Report indicates that this objective remains valid.*
- Page 8, Item 17: Guide waterfront development to maintain visual and pedestrian access to the Bayshore for the general public while encouraging development that is suitably scaled, compatible with public facilities and services, and appropriate to a waterfront location. *The 2015 Master Plan Reexamination Report indicates that the Borough remains invested in making the best use of its vicinity to waterfront views and beach areas.*

#### Master Plan Amendment

Planning Objectives:

- Page 36, Item 4: *Establish appropriate population densities and control the intensity of development to ensure neighborhood, community, and regional well-being and to preserve the natural environment.*
- Page 36, Item 7: *Provide sufficient space in appropriate locations for residential, recreational, commercial, and open space use.*
- Page 37, Item 13: *Encourage development that contributes to the revitalization of the community.*
- Page 37, Item 17: *Guide waterfront development to maintain visual and pedestrian access to the Bayshore for the general public while encouraging development that is suitably scaled, compatible with public facilities and services, and appropriate to a waterfront location.*

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First Engineering & Planning Review

Resiliency Objectives:

- Page 37, Item 1: *Planning new development to minimize risk from natural hazards.*

Policy Statements:

- Page 37 – Housing and Neighborhood Improvement: *In order to maintain and improve residential areas, the Borough should encourage rehabilitation of the existing housing stock with new construction at appropriate densities, elevations and other relevant design standards. The enforcement of building and land use codes, as well as FEMA flood mapping, to protect and maintain properties should be aggressively pursued. Municipal action should facilitate the improvement of the livability of residential areas. The Borough should continue to seek public funding and explore innovative mechanisms and incentives for housing and neighborhood improvement.*
- Page 38 – Economic Development: *Development and redevelopment that contributes to the long-term economic health of the community should be encouraged. Municipal action to broaden the community's economic base should include participation in government programs to attract development, create employment opportunity, utilize the community's resources, and be compatible with the need to maintain facilities and services for the Borough's residents.*
- Page 38 – Bayfront Development: *Guide waterfront development to provide shore protection and flood control. Waterfront development should also maintain and enhance visual and pedestrian access, recreation and open space, and economic development. The Borough should encourage appropriate use of and access to the Raritan Bayshore through coordination with Monmouth County's planning efforts.*

Land Use Plan Element:

- Page 39 – Building Resiliency through Development Regulations: *Given the experience of Hurricane Sandy and the potential for future storms, there is a compelling need to build resiliency in the Borough of Keansburg. The Land Use Plan Element, therefore, recommends that the Borough's development regulations be designed to build resiliency throughout the Borough. This should be done through the promotion of green building and infrastructure techniques. This section of the Land Use Plan Element overviews green building and infrastructure techniques and is meant to inform the future development of municipal development regulations.*

The Land Use Plan Element recommends the following green building and infrastructure techniques and best practices to facilitate resiliency measures within the Borough, as outlined on pages 40 through 42:

- Downspout Disconnection
- Rain Gardens
- Bioswales
- Permeable Pavements
- Green Roofs
- Tree Cover

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First Engineering & Planning Review

The applicant should provide testimony on the proposal's conformance with said goals, objectives and policy statements above for the Board's consideration. Given the location of the subject property, specific testimony should include, but not be limited to, how the proposal will impact stormwater management and flood control measures, pedestrian access to existing and proposed open space, green building/infrastructure strategies utilized (outlined above), and how the proposed design minimizes potential risks from natural hazards such as hurricanes and related storm surge.

Based on our review of the plans, it appears that several of the green building and infrastructure techniques outlined in the Land Use Plan Element above are not adequately addressed as part of the proposal, as proposed open space, landscaping and tree cover are limited throughout the site. Testimony should be provided to explain where and how the proposed design could address these issues.

2. Beachway Avenue II Redevelopment Plan  
(Adopted December 17, 2025)

Section 1 – Introduction:

The purpose of the Redevelopment Plan includes the following, as outlined in Section 1.1 of the Plan:

- The Keansburg Beachway Avenue Waterfront Redevelopment Plan, first adopted in 2017 and later amended in 2021, was created to establish new development standards for Block 184, Lots 1, 3.02, 3.03, and part of Lot 3.01, located along Beachway Avenue. This Redevelopment Plan has been developed as a standalone plan for Lot 1, an undeveloped property, separating it from the Beachway Avenue Waterfront Redevelopment Area.
- The goal of this Redevelopment Plan is to promote the Borough's efforts to improve and energize the beachfront area, turning it into a year-round destination for both residents and visitors. The plan draws from the recommendations outlined in the Borough's 1988 Master Plan, the 2003, 2012, and 2015 Master Plan Reexamination Reports, and the 2015 Route 36 to Bayfront Corridor Resiliency Plan. It is expected that implementing this plan will also encourage neighborhood revitalization beyond the waterfront area.

Section 2.1 – The Public Purpose: Goals and Objectives

The Redevelopment Plan is based on the following smart growth principles, as outlined in Section 2.1 of the Plan:

- *Strengthening neighborhoods,*
- *Providing economic development opportunities,*
- *Offering various housing opportunities,*
- *Developing a mixture of land uses,*
- *Providing a pedestrian-oriented environment, and*
- *Utilizing high quality design standards.*

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First Engineering & Planning Review

Additionally, Section 2.1 of the Plan includes the following objectives that are relevant to the proposal:

- *Advance the revitalization of the Borough.*
- *Develop a mixture of residential uses and recreational opportunities that will add needed taxable improvements to the Borough's ratable base.*
- *Enhance public access to waterfront recreation uses.*
- *Maintain views of the coastline and enjoyment for the public.*
- *Provide parcels of land of sufficient size and dimension to enable an orderly arrangement of new land uses.*
- *Develop land use and building requirements specific to the Redevelopment Area that are sensitive to the adjoining neighborhoods.*
- *Address existing and future traffic, environmental, and flooding issues that could result from redevelopment.*
- *Undertake infrastructure improvements, including those of water and sewer lines, streets, curbs, sidewalks, and parking.*
- *Ensure a long-term productive reuse of each of the lots located within the Redevelopment Area.*

### Section 3.1 – The Redevelopment Plan: Redevelopment Activities

*The Redevelopment Plan aims to support higher-density residential uses and enhance a variety of waterfront and recreational amenities along the Raritan Bay shoreline. It is planned that the Redevelopment Area will be a coordinated effort, allowing both privately and publicly owned parcels to contribute maximally to the public good. The redevelopment will be carried out in a way that complements the surrounding environment. To achieve this, the proposed land uses will feature a balanced mix of residential and recreational activities, designed as a comprehensive development in line with the standards outlined in this Redevelopment Plan.*

*The major activities planned for the Redevelopment Area include:*

- *Development of year-round residential and recreational uses.*
- *Increased opportunities for public access to the beachfront.*
- *Improvements to parking areas.*
- *Utility and infrastructure upgrades necessary to support the Redevelopment Plan.*

The applicant should provide testimony on how the proposal conforms with the Redevelopment Plan objectives above. Specific testimony should include but not be limited to the proposed pedestrian circulation throughout the site and its connectivity to the surrounding waterfront area, proposed recreation and open space for residents, and how the proposal aids in establishing the Redevelopment Plan area as a destination point for the region.

### C. Zoning – Permitted Uses

As indicated in the subject property description above, the entirety of the Subject property (Block 184, Lot 1) is located in the Beachway Avenue II Redevelopment Area Overlay of the Beachway Avenue II Redevelopment Plan (adopted December 17, 2025). Portions of the subject property are also located within the underlying B-2 (Mixed Use Commercial-Residential) Zoning District and the CR (Conservation Recreation) Zoning District. The Redevelopment Plan serves as an overlay to the underlying zones above.

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First Engineering & Planning Review

In accordance with § 3.3.2 of the Redevelopment Plan, all permitted uses are subject to the requirements of the Redevelopment Plan's Design Standards, the Keansburg Zoning Ordinance, or as otherwise stated in the Plan. Uses permitted by specific provision of Municipal Land Use Law are also permitted on the redevelopment parcels.

The following is a list of permitted uses, pursuant to § 3.3.2:

Permitted Principal Uses

- Multi-family residential (including age-restricted units for persons 55 years and older);
- Marinas;
- Water transportation;
- Essential Services;
- Passive or low intensity recreational uses;
- Parks or open space;
- Docks, piers, moorings, marinas, boat launches, and related water dependent recreation or transportation facilities for which required Waterfront Development Permits and Coastal Area Facility Review Act permits have been issued;
- Accessways to the water's edge; and
- Structures deemed necessary for shore protection and flood prevention.

Required Accessory Uses:

- Off-street parking and loading

Permitted Accessory Uses:

- Customary accessory uses and structures provided such uses are incidental to the principal use; and
- Exempt signs.

As indicated above, the proposed multi-family residential apartment complex is considered a permitted principal use and therefore does not require a use variance.

**D. Zoning – Bulk and Area Requirements, Design Standards**

1. Bulk and Area Requirements

The proposal's conformance with the bulk requirements of Redevelopment Plan, pursuant to § 3.3.3 are outlined in the table below. We note that pursuant to § 3.3.1 of the Redevelopment Plan, "*All terms used herein shall have the same meaning as defined in the Keansburg Zoning Ordinance unless otherwise specified in this Redevelopment Plan.*"

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 First Engineering & Planning Review

Bulk Requirements – Beachway Avenue II Redevelopment Plan: § 3.3.3				
Standard	Required/Permitted	Existing	Proposed	Conforming
Minimum Lot Area	1.75 Developable Acres	2.65 Developable Acres	No Change	Yes
Minimum Lot Frontage	150 feet	687.3 feet	No Change	Yes
Minimum Front Yard Setback	50 feet	N/A	61.7 feet	Yes
Minimum Side Yard Setback (East)	10 feet	N/A	37.5 feet	Yes
Minimum Side Yard Setback (West)	10 feet	N/A	43.6 feet	Yes
Minimum Rear Yard Setback	No requirement except setbacks from dunes shall be subject to CAFRA requirements	N/A	51.5 feet	Yes*
Maximum Lot Coverage	80% (As permitted by CAFRA regulations)	33.2%	75.5%	Yes
Maximum Floor Area Ratio (F.A.R.) <sup>1</sup>	2.5 (developable acres <sup>2</sup> only)	N/A	<2.5	Yes
Minimum Gross Floor Area	75,000 SF	N/A	>75,000 SF	Yes
Maximum Residential Density	50 dwelling units (DU) per developable acre	N/A	23.6 DU per developable acre	Yes
Maximum Building Height	6 stories or 70 feet	N/A	5 stories; 69.4 feet	Yes
Minimum Open Space	10%	N/A	10.3%	Yes**

\*See Item 1. below.

\*\*See Item 2. below.

Summary of Potential Design Waivers & Recommendations:

1. § 3.3.3 – Minimum Rear Yard Setback. The Zoning Schedule on Sheet 1 of the plans indicates that the proposed 51.5-foot rear yard setback conforms with CAFRA requirements pertaining to minimum building setbacks from dunes. It appears the proposed setback conforms in accordance with the CAFRA permit approval requirement.

Testimony must be provided to determine if the plans comply with the relevant CAFRA setback requirement along with a reference to its specific subsection pursuant to N.J.A.C. 7:7 to determine whether a design waiver applies to the proposal.

<sup>1</sup> Ground level parking within proposed structures shall not be included in calculation of F.A.R.

<sup>2</sup> A developable acre shall be land area which is free of wetlands, beaches, dunes, and easements or other encumbrances.

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First Engineering & Planning Review

2. § 3.3.3 – Minimum Open Space. A minimum open space amounting to 10% of the total developable lot area (115,434 SF) is required, whereas a minimum open space of 10.3% (11,927 SF) is proposed.

We note that the open space calculations shown on Sheet 1 of the plans include the rear and side yard setbacks totaling 7,813 SF, and the area between the buildings totaling 4,114 SF. In accordance with § 22-2.4 of the Borough Ordinance, common open space is defined as “...an open space area within or related to a site designated as a development, and designed and intended for the use or enjoyment of residents and owners of the development. Common open space may contain such complementary structures and improvements as are necessary and appropriate for the use or enjoyment of residents and owners of the development.”

The applicant should provide testimony on whether the side and rear yard setback areas included in the open space calculations conform with the definition above and can be counted towards meeting the minimum open space requirement.

3. Waiver Considerations:

Pursuant to § 3.3.4, *Variation from the requirements set forth in this Redevelopment Plan may be necessary in certain unusual circumstances or to meet state or federal permit requirements. The Planning Board of Adjustment may waive density, FAR, height, bulk, parking, or design requirements if the designated redeveloper demonstrates that such a waiver will not substantially impair the intent of this plan, and will not present a substantial detriment to the public health, safety, and welfare. Prior to the granting of any such waivers from the requirements of this Redevelopment Plan, the Board shall refer any waiver applications to the Borough Council, acting as the Redevelopment Entity, and the Borough Council shall provide any comments or objections to the grant of the waivers to the Board within the time period allowed for the rendering of decisions on applications for development pursuant to the Municipal Land Use Law. If the Borough Council has reviewed the development application prior to its submission to the Board and has rendered comments or recommendations on requested waivers, the Board shall not be required to refer the waiver request unless the application is substantially revised and the nature of the waivers changes from that which was already reviewed by the Borough Council.*

The applicant should provide sufficient testimony regarding the potential required waivers above and whether or not they substantially impair the intent of the Redevelopment Plan and present a substantial detriment to public health, safety, and welfare.

Additional Redevelopment Plan Design Standards:

4. § 3.3.5 – Beach or Waterfront Access Improvements. The applicant is proposing waterfront access improvements via two proposed pedestrian concrete walkways on the Northeast and Southwest sections of the property that connect to the existing Baywalk along the waterfront. However, each entrance to the proposed concrete walkway and Baywalk is only accessible via stairway, and no ADA-accessible ramp for each entrance is shown on the plans.

Testimony should be provided to determine if the plans must be revised to include an ADA accessible ramp instead of the proposed stairways for both entrances connecting the subject property to the Baywalk, along with construction details of same.

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First Engineering & Planning Review

Additionally, testimony should be provided to determine if Sheet 2 should be revised to label the location of any proposed directional/informational signage for these areas. We recommend that the plans be revised to include additional lighting for these areas, in accordance with the Redevelopment Plan section above.

5. §3.3.6 – Façades.

a. Façade Design. The side ground floor façades are comprised of a single stone veneer material with little variance in setback design, glazing, and fenestration elements and present the appearance of a blank wall. In accordance with the standards of the Redevelopment Plan, design elements should include:

- *Visual Diversity.*
- *Traditional Proportions of base, middle and top.*
- *A variety of materials.*

Additionally, the Redevelopment Plan states *“The exterior walls of buildings, as seen from a public right of way, shall be designed to provide a visual diversity that is consistent with the architecture found throughout the Borough of Keansburg. Exterior walls shall include windows, doors, porches, pilasters, horizontal/vertical building elements and/or other similar architectural features to relieve the monotony of a blank wall and to achieve a human scale. Side and rear elevations of buildings shall be comparable to that of the front façade, if visible to the public.”*

Testimony should be provided to determine if the applicant should revise the side building elevations to provide additional fenestration/variation such as windows to prevent the appearance of a blank wall. However, we note that the proposed upper floors of the building appear to meet the above façade requirements.

b. Façade Materials & Colors. In accordance with the requirements of the Redevelopment Plan, *“The exterior walls of buildings shall be made of durable building materials such as stone, brick, wood, or stucco. Aluminum siding, vinyl or vinyl-coated siding, metal panels, and mirrored glass exterior surfaces are prohibited. Pole barns or prefabricated metal buildings are prohibited.”* The applicant proposes panel siding and cedar shake siding. Additionally, no proposed colors are labelled on the architectural building elevations.

The applicant shall confirm that the proposed building materials meet the requirements of the Redevelopment Plan, specifically the proposed panel siding. The architectural plans must be revised to label all colors of the proposed materials.

6. §3.3.7 – Street Furniture and Lighting. A Lighting Plan has been provided that conforms with the requirements of the Redevelopment Plan. The proposed quantity, type, location and illumination levels of the proposed fixtures is acceptable with minimal light spillage onto adjacent properties.

Pursuant to the Plan, *“All utility boxes and exterior HVAC equipment should be hidden by architectural features or landscape plantings and placed above the flood level.”* The plans must be revised to show full landscape screening of the proposed transformer located at the eastern portion of the site within the front yard.

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 First Engineering & Planning Review

Details for benches and trash receptacles have been provided on the plans; however, their proposed location is not labelled. The plans must be revised to label the location of the proposed trash receptacles and benches.

7. §3.3.9 – Landscaping and Street Trees. A Landscaping Plan has been provided that conforms closely with the requirements of the Redevelopment Plan. However, certain plan revisions are required based certain applicable Ordinance requirements. Please refer to our comments pertaining to landscaping in Section J. below.
8. §3.3.10 – Vehicular / Pedestrian Circulation. The applicant has complied with providing pedestrian walkways along the front yard and extending the entirety of the Beachway Avenue right of way and between all buildings. However, the applicant does not provide proper crosswalks from the parking areas in front of the buildings and building entrances to Beachway Avenue. Testimony should be provided to determine if the design must provide crosswalk and sidewalk access to Beachway Avenue from the east and west sides of the property compliant with ADA requirements.
9. §3.3.11 – Parking. The applicant is required to abide by the parking requirements as stipulated in the State’s Residential Site Improvement Standards (RSIS) and Municipal Land Use Law. The required parking spaces for the proposed project are as follows:

Residential Multi-Family Dwelling Parking (RSIS)			
Description	Required*	Proposed	Conforming
2 Bedroom Multi-Family Dwelling	128 Spaces	132 Spaces (Including EV Spaces Below)	Yes (See EV Space Credits below)
Electric Vehicle (EV) Space Requirements & Credits – N.J.A.C. 40:55D-66.20a.			
Description	Minimum Required*	Proposed	Conforming
Electric Vehicle (EV) Spaces	19 Spaces (including 1 ADA-accessible EV space below)*	<b>5 Spaces</b>	<b>No</b>
ADA-Accessible EV Spaces	1 Space	1 Space	Yes
EV Parking Credit	<i>A parking space prepared with EV make-ready equipment or a charging station shall count as two parking spaces towards complying with the minimum parking requirement, with a reduction of up to 10% of the total required parking</i>	5 Spaces	N/A
Total Parking Required (Including 10% EV Space Discount from Total Required Parking)	123 Spaces	132 Spaces	Yes

\*Off-Street Parking Requirements/Calculations:

- 2.0 spaces for each two-bedroom unit: 64 two-bedroom units × 2.0 = 128 spaces
- EV Spaces: minimum of 15% of total required parking
  - 128 spaces required × 15% = 19.2 spaces, rounded to 19 EV spaces required

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First Engineering & Planning Review

- ADA-accessible EV spaces: Minimum of  $5\% \times 19 = 0.95$  spaces, rounded to 1 ADA EV spaces required
- In accordance with N.J.S.A. 40:55D-66.20e., Each EV Make-Ready space or charging station shall count as two parking spaces for the purpose of complying with the minimum parking requirements, with a reduction of no more than 10% of the required parking. 128 total spaces required – 5 EV spaces = Total of 123 spaces required.

Additionally, in accordance with N.J.S.A. § 40:55D-66.20.a.(1)(a) through N.J.S.A. § 40:55D-66.20.a.(1)(c), 1/3rd of the 19 required EV spaces must have charging stations installed prior to the issuance of a Certificate of Occupancy (CO), an additional 1/3rd of the required EV spaces must have all EV charging stations installed within 3 years following the date of the issuance of a certificate of occupancy, and the final 1/3rd of the required EV spaces must have all EV Charging equipment installed within six (6) years following the date of the issuance of a certificate of occupancy. The proposal does not meet this requirement, as a total of only 5 EV charging spaces are proposed, where 6 are required.

The applicant complies with the overall parking requirement but does not comply with the State's EV parking requirements. A total of 19 EV spaces is required, of which 6 must contain EV charging equipment. The site plan shows only 5 EV spaces with charging equipment. The applicant must provide one (1) additional EV space with charging equipment and thirteen (13) EV make-ready spaces to comply with the State regulations. Additionally, the applicant's EV parking requirement calculations are inaccurate and must be revised to be consistent with the table shown above.

## E. Site Plan

1. Ordinance Section 22-9.8.c.2.f requires sight triangle easements at driveways and prohibits the planting of trees or other plantings or structures exceeding 30 inches in height that would obstruct the clear sight across the area. The plans shall be revised to indicate sight triangles at the proposed driveways and the applicable restrictions stated above.
2. Each building contains an approximately 10' by 9' trash enclosure with two (2) containers and a double gate located under the covered porch. Trash chutes are provided in a mechanical room on the upper floors for trash disposal. The applicant shall confirm the adequacy of the containers in managing trash and recyclables for each building and indicate the process, times, frequency of refuse pickup and the anticipated private solid waste collection service.
3. We note that access to the enclosure is via a 6-foot-wide concrete sidewalk extending from the onsite drive aisle. The applicant should indicate if the dumpsters will be rolled to the curb during trash pick-up. If so, the plans should be revised to depict the dumpsters with wheels and a detail for same should also be included in the plans.
4. The applicant shall indicate where loading operations for move-in / move-out will take place. It appears that no parking of vehicles is allowed along the onsite drive aisle which also serves as a fire lane. The applicant should consider using one of the parallel parking space along the rear drive aisle as a designated loading space for move-in / move-out.
5. We defer to the Keansburg Fire Marshall for review of the application with respect to emergency vehicle access and maneuvering. Truck turning templates have been provided for emergency fire truck trash truck maneuverability.

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Block 184, Lot 1  
Beachway Avenue II Redevelopment Plan Overlay  
B-2 (Mixed-Use Commercial Residential) & CR (Conservation Recreation) Zones  
First Engineering & Planning Review

6. The site is within close proximity to access of the Henry Hudson Bike Trail. Testimony should be provided to address whether or not bike racks would be appropriate for the proposed project.
7. The applicant shall provide testimony concerning compliance with the State's freeboard requirements with respect to the elevation of residential units and electrical equipment and utilities above base flood elevation.
8. The applicant shall verify/clarify that there are two (2) existing utility poles with a guy wire to the west of the southeast driveway. It also appears that same conflicts with the proposed sidewalk. The plans shall be revised to eliminate this conflict.
9. We note that several existing utility poles and proposed improvements such as curb and portion of the on-street parking spaces will be outside of the Borough's right-of-way. It appears an easement should be dedicated to the Borough of Keansburg for these existing and proposed improvements.
10. A construction easement will be required for the proposed concrete walk to be constructed on adjacent Lot 3.02.
11. The block retaining wall along the east property line is proposed near the porous pavement system with subsurface storage system. There is a concern that the geogrid associated with the construction of the retaining wall will extend within the footprint of the porous pavement system. The applicant shall revise the plans to avoid this conflict.
12. The applicant shall indicate how the rooftop amenity, club room, bar and fitness room in Building 2 will be used and managed. Will they be made available to condo owners on Building 1 and 3?

#### **F. Traffic Impact**

1. The Traffic Impact Statement (TIS) utilizes traffic counts conducted on May 25, 2023, increased by a 1.4% seasonal adjustment. It is unclear how the seasonal adjustment was calculated, as the NJDOT seasonal adjustment for Beachway Avenue (an urban local road in Region 4) from May, 2023 to July, 2023 is 8.85% ( $0.922/0.847=8.85\%$ ). Furthermore, the counts were conducted before the adjacent Keansburg Amusement Park opened for the season. Additional information / testimony should be provided how the site will operate during summer months with the amusement park and related destinations are in full operation.
2. Traffic Impact Statement (TIS) states a 2.75% growth rate was applied to the 2023 volumes for four years to obtain the 2027 No Build Traffic volumes. The source of the background growth rate utilized should be provided, as according to the most recent NJDOT annual background growth rate table, an urban local roadway in Monmouth County has a background growth rate of 1% per year.
3. The Traffic Impact Statement (TIS) should be revised to include any planned/approved developments in the area that were not complete at the time traffic counts were performed.
4. The Traffic Impact Statement (TIS) utilizes ITE 11<sup>th</sup> Edition Trip Generation Manual estimates for Land Use Code 221, Multi-Family Housing (Mid Rise) indicating the site is projected to generate 24 trips in the morning peak hour and 25 trips during the evening peak hour. We note that 12<sup>th</sup> Edition rates are currently available, which result in minor changes to the projected trip generation

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for the development. The applicant should provide testimony confirming that updating the trip generation estimates to the ITE 12<sup>th</sup> Edition will not change the conclusions drawn in the report.

5. The Traffic Impact Statement (TIS) concludes that the site driveways will operate at a Level of Service 'A' for all movements during both the weekday morning and weekday evening peak hours. Additional information / testimony should be provided to confirm that the discrepancies noted above will not change the conclusions drawn in the TIS.

## **G. Environmental**

1. The Environmental Impact Report addressed portions of the Coastal Zone Management Rules (N.J.A.C. 7:7) and Flood Hazard Area Control Act Rules (N.J.A.C. 7:13), the Report has not addressed the revised versions of these rules as presented under the New Jersey Protecting Against Climate Threats Resilient Environments and Landscapes (NJ PACT REAL) Rules. These rules, which were adopted on January 20, 2026, amend the existing rules under N.J.A.C. 7:7 and N.J.A.C. 7:13. The NJ PACT REAL rules allow for certain applications to be reviewed under the previous regulations during a "legacy period", which expires on July 20, 2026. It is our understanding that the applicant is grandfathered and has submitted the Permit Applications. The applicant should provide information on the status of the permit reviews.
2. The proposed project activities are located within the Coastal Zone Area Facilities Review Act (CAFRA) Zone as well as a Federal Emergency Management Agency (FEMA)-designated floodway, the applicant will need to obtain a CAFRA Individual Permit (IP) with any applicable N.J.A.C. 7:13 rules addressed within. As the project proposes the installation of impervious surface in excess of one-quarter (1/4) acre, the proposed project would be classified as a "Major Development" under N.J.A.C. 7:8 and would therefore require compliance with and review under the Stormwater Management Rules.

## **H. Water & Sewer**

1. Building 2 includes 8 type A units, and buildings 1 and 3 include 4 type A units each. These units would normally be considered 3-bedroom units except that the third apparent bedroom is labeled as a "Study". If these units were classified as 3-bedroom dwellings, it would increase the anticipated water and sewer demand for the development by 1,200 gallons per day (16 units \* 75 gpd). The water demand would need to be reviewed by Keansburg to ensure adequate supply.
2. Only domestic water demands were provided. Fire flow demands must be calculated and reviewed by Keansburg water and sewer and the fire official to confirm sufficient supply.
3. The plumbing code requires that any plastic pipe that is 6" or smaller in diameter use 1/2" or smaller stone, if the pipe will be bedded in stone. Multiple details on the plans and the technical specifications call for 3/4" stone bedding for the 6" PVC sewer lateral. These should be updated to show 1/2" stone.
4. The sewer saddle connection should not be encased in concrete.
5. The sewer cleanouts at the property line should be moved behind the curb.

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6. Both the fire service and domestic service lines should have gate valves with valve boxes added inside the property line and, where appropriate, behind the curb. The tapping valves may be provided with valve boxes as shown on the plans, or they may be buried without a valve box.
7. The proposed hydrant should have a gate valve with valve box located in the street. The tapping valve may be used to satisfy this requirement.
8. The existing hydrant is too close to the curb. It should be relocated to be a minimum of 2' and a maximum of 6' from the curb.
9. There are two hydrants shown on the plans; one existing and one proposed. The IFC requires that all exterior portions of the buildings on site be within 400 feet of a hydrant. This requirement is met by the two hydrants as shown. However, the IFC also requires that hydrants be located within 100 feet of the fire department connection of buildings with a standpipe system. This requirement is not met by the two hydrants as shown if these buildings will have standpipe systems (which appears to also be a requirement)
10. A fire flow, pressure test, and capacity analysis shall be performed on the existing water line along Beachway Avenue.
11. The applicant shall replace the existing 8" watermain along Beachway Avenue from Oakwood Place up to the curve where Beachway and Laurel Avenue meets.
12. Both the fire service and domestic service lines should have reduced pressure zone backflow assemblies installed prior to any other branch or connection in the line. The domestic service lines should also have a meter installed upstream of the backflow prevention assembly. These are not shown on the plans. They may be located inside the building, or they may be required to be located outside in above-grade heated enclosures, at Keansburg's discretion.
13. The proposed hydrant should have an easement extending 10' from the hydrant and service line dedicated to Keansburg. It should be relocated to face the public street, outside of the parking area, and at a minimum of 2' and a maximum of 6' from the curb.
14. The plans shall be revised to indicate the size and type of the existing water and gas mains along the frontage of Block 184, Lot 1.
15. The plans shall be revised to include the proposed invert elevations of the sewer laterals from the building to the connection at the main.

## **I. Grading & Drainage**

1. Revise the plans to indicate the flush curb elevation at the ramp connecting the proposed beach access concrete walk to the west of the property.
2. Provide TW and BW elevations at the bends and ends of the retaining walls along the west property line.
3. The proposed area of disturbance is greater than 1 acre (2.71 acres), and the project results in an increase of impervious surfaces, motor vehicle surfaces, or a combination by more than one-quarter

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acre, therefore, the project is considered a “major development” as defined by N.J.A.C. 7:8 and is subject to the NJDEP Stormwater Management standards and the Borough’s Stormwater Control Ordinance. However, the project is located within the Metropolitan Planning Area (PA-1) per the State Plan Policy Map and qualifies as an Urban Redevelopment Area, per NJAC 7:8-5.4, the project site is exempt from groundwater recharge requirements but must comply with water quality and quantity requirements.

4. The applicant is proposing a porous pavement system located within the 24 ft wide main drive aisle, that loops around the three proposed buildings to address both stormwater quality and quantity. The proposed porous pavement system meets the Green Infrastructure requirement as the system has sufficient storage volume to contain the water quality design storm (WQDS) runoff volume without overflow.
5. The Stormwater Management Report states that the porous pavement with underground storage has been designed to entirely store and reduce the developed runoff to 50%, 75% and 80% of the current and projected 2, 10 and 100-year storm pre-development flows. We have reviewed the applicant’s existing and proposed routing calculations and we note that the porous pavement system stores the increase in post-development runoff volumes and attenuate the outflows to below pre-developed peak runoff rates with the required reductions.
6. The plans shall be revised to depict the footprint of the proposed porous pavement system on all sheets.
7. Revise the plan to provide a cleanout at all proposed bends along the 6” perforated underdrain to facilitate maintenance in the event the system becomes clogged.
8. Provide calculations for the stormwater collection piping system and associated inlet drainage area map.
9. All pipes entering the porous pavement system shall clearly be shown on the plans and labeled to include all pipe sizes, lengths, slopes, and inverts, etc.
10. The outflow from the site will be connected to an existing ‘B’ inlet which is proposed to be replaced on Beachway Avenue via a 15” RCP pipe. We note the downstream pipe is an existing 12” RCP pipe. The applicant shall upgrade the existing downstream piping system to a 24” pipe at the point of connection to the intersection of Laurel Avenue and Seabreeze Way.
11. Provide details of the inspection port associated with the proposed porous pavement system.
12. The applicant should indicate the purpose of the existing 12” RCP pipe to remain at the rear property line and whether future connection is contemplated.
13. We note the inspection checklist and maintenance log includes inspection and maintenance for items such as low flow channels, emergency spillway and access roads which are not applicable to the proposed porous pavement system. All inspection and maintenance measures for items that are not applicable to proposed porous pavement system shall be removed.
14. The Basin Inspection Checklist and Maintenance Log shall be revised to include inspection and maintenance measures for the inspection ports of the porous pavement system.

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15. The annual maintenance cost shall be revised to include cost associated with JetVac the surface course of the porous pavement system that is required at least four (4) times per year.

#### **J. Landscaping and Lighting**

1. Ordinance Section 22-9.8.c.2.f requires sight triangle easements at driveways and prohibits the planting of trees or other plantings or structures exceeding 30 inches in height that would obstruct the clear sight across the area. The plans shall be revised to indicate sight triangles at the proposed driveways and the applicable restrictions stated above.
2. To the extent possible while providing satisfactory illumination on the roadways and pedestrian sidewalks, the lighting plan shall be revised to minimize lighting spillage to the Beachway Avenue Right-of-Way. A maximum illumination value of 0.8 footcandles is shown along the Beachway Avenue Right-of-Way, which exceeds the allowed street illumination of 0.4 footcandles for a residential development on a local street as per Exhibit 11 of the Ordinance.
3. Provide a foundation detail for the proposed light poles.

#### **K. General Comments**

1. Detailed structural calculations, signed and sealed by a Professional Engineer licensed in the State of New Jersey, must be provided for the proposed retaining walls. We defer to the Building Department for further review and approval of the walls.
2. Details for benches and trash receptacles are provided on Sheet C9.03 and bollard on Sheet C9.01. The plans shall be revised to depict their locations.
3. The applicant shall confirm if any site identification signage is proposed. If proposed, construction details shall be provided confirming the applicant's compliance with Ordinance Section 22-7.24 and Section 3.3.8 of the Redevelopment Plan. We note that the applicant is proposing to relocate the existing "Welcome to Keansburg" sign at the southern end of the property.
4. The applicant shall provide testimony regarding the project's affordable housing requirements per Section 3.8 of the Redevelopment Plan.
5. We defer to the Floodplain Administrator and Construction Official for any applicable building requirements accordingly.
6. If approved, the applicant will be required to post all performance guarantees and inspection escrow as stipulated in the Development Regulations.

#### **L. Local & Outside Agency Approvals**

This application is subject, but not limited to the following outside agency approvals or letters of no jurisdiction:

- a. Monmouth County Planning Board
- b. Keansburg Fire Marshall
- c. New Jersey Department of Environmental Protection

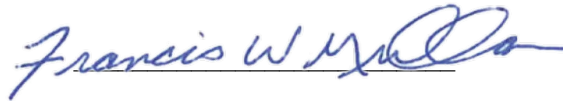
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- i. Flood Hazard
- ii. Sanitary Sewer Extension/TWA Permit
- iii. Water Main Extension
- d. Keansburg Flood Plain Manager
- e. Bayshore Regional Sewerage Authority
- f. Keansburg Water and Sewer Department
- g. Freehold Soil Conservation District

We reserve the opportunity to further review and comment on this application and all pertinent documentation, pursuant to testimony presented at the public hearing. If you have any questions regarding this matter, please do not hesitate to contact our office.

Very truly yours,

T&M ASSOCIATES



FRANCIS W. MULLAN, P.E., C.M.E.  
BOROUGH OF KEANSBURG  
PLANNING BOARD OF ADJUSTMENT ENGINEER

FWM:LZ

cc: Kevin Kennedy, Esq., Board Attorney  
Kathy Burgess, Assistant Zoning Officer  
Tom Critelli, Beachway Avenue Realty, LLC - 7 Heyward Hills Drive, Holmdel, NJ 07734  
Marty Pflugar, Esq, Applicant Attorney  
Jason Fogler, P.E., MidAtlantic Engineering Partners, LLC - Gateway 195 Centre, 5 Commerce Way, Suite 200,  
Hamilton, NJ 08691

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