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To: Oceanport Borough Council

From: Kendra Lelie, PP, AICP, LLA

Re: **NJSEA Site Plan Submission**
Monmouth Park
Proposed Mixed Use Project

Date: July 18, 2023

Pursuant to the Mayor's request, I reviewed the site plan submission from the NJ Sports and Exposition Authority (NJSEA) for a proposed mixed-use project at Monmouth Park. Please find below a brief description of the project based upon the information presented in the site plan set of documents and my comments of the proposed development as it relates to the overall design, community compatibility, conformance with the Borough's 2016 Master Plan and the Borough's 2020 Housing Element and Fair Share Plan.

1.0 Project Description

The NJSEA is proposing a mixed-use development on a portion of the property known as Monmouth Park. The development is proposed in several phases and includes the following uses:

- Phase 1
 - 388 residential units located on a portion of the southwestern corner of the site encompassing approximately 30 acres to include:
 - 12 three-story apartment buildings containing one-, two- and three-bedroom units;
 - 97 one-bedroom units (of which 18 will be affordable)
 - 271 two-bedroom units (of which 44 will be affordable)
 - 20 three-bedroom units (of which 15 will be affordable)
 - 20% setaside of units for affordable housing;
 - 15,000 square foot clubhouse;
 - Outdoor pool;
 - Tot lot;
 - Dog park;
 - Tennis courts; and
 - Picnic area
 - Hotel including 200 rooms at 8 stories located to the southwest of the existing restaurant



and mini-golf area.

- Phase 1 parking (total of 2,961 spaces) to including the following:
 - 2,085 spaces for the existing racetrack
 - 676 spaces for the residential apartments (2 spaces/du)
 - 200 spaces for the hotel (1 space/room)
- Phase 2
 - Mixed use development located to the west of the main grandstand including:
 - Entertainment use;
 - Retail; and
 - Office.
 - Phase 2 parking is not quantified and indicated as “to be determined” in the submitted site plan. However, a parking garage is proposed to the southeast of the main grandstand in this phase.
 - Phase 2 also includes a green triangular area located to the south of the existing train stop. The use of this area is not labeled.

2.0 Residential Development

- a. **Building Height/Stories and Neighborhood Compatibility. The proposed development is not consistent with the overall Oceanport Borough character and specifically the surrounding neighborhood character.**

NJSEA is proposing 12 three-story apartment buildings located directly across Port-Au-Peck Avenue from the existing Jockey Club neighborhood. The Jockey Club is an existing age-restricted community containing 1.5 to 2 story single family dwelling units. The closest three-story building is located within 150 feet of the Jockey Club neighborhood. The proposed layout of the three-story apartment buildings contrasts with the existing architectural fabric of the neighborhood. As an alternative, the developer should consider the inclusion of single family detached and attached dwelling units in lieu of the larger apartment buildings to create consistency and compatibility with the surrounding neighborhood.

- b. **Unit Count and Bedroom Distribution is too dense.**

As noted above, the proposed development includes approximately 25% one-bedroom units, 70% two-bedroom units and 5% three-bedroom units. First, it is rare to see three-bedroom units in an age-restricted community and three-bedroom units are not required for the affordable units as it is an age-restricted community. Typically, in an age-restricted community, there is a larger percentage of one-bedroom units and a lesser percentage of two-bedroom units. If the NJSEA

insists on apartment buildings, the building mass can be reduced if the bedroom distribution includes more one-bedroom units and less two-bedroom units.

c. Amenity Layout is Inadequate.

The tot lot and dog park are located very close to the intersection of Port-Au-Peck Avenue and Oceanport Avenue. These amenities should be relocated away from this busy intersection and more centrally located so that all residents have easy access to them.

d. Planting Buffer should be Required and Significant

Given the proximity of existing residential neighborhoods and public open space to proposed development, the building and parking improvements should be located outside of a 100-foot buffer. A planted buffer should be provided as a screen of the proposed development from any adjacent residential or public open space area to adequately protect the quality of life for the existing residents and users of the public open space.

e. Affordable Housing Implications creates Need for Additional Development in Borough.

For this proposed development a 20% set aside of age-restricted units represents 78 affordable housing units and a density of 13 dwelling units per acre. In accordance with the Council on Affordable Housing (COAH) regulations because Oceanport is what is known as a vacant land town, this development would impose a Realistic Development Potential (RDP) obligation of 78 affordable housing units but due to the cap of 25% on age-restricted units, the Borough would only be able to take a credit of 19 units ($78 \times .25 = 19.5$ and round down). This would leave the Borough in a deficit of affordable housing units and the need to create a plan to provide 59 affordable housing units ($78 - 19 = 59$) elsewhere in the Borough. Given the lack of land to support an inclusionary development (which would require approximately 5 times the number of affordable units) that would provide 59 affordable housing units, it is very unlikely that the Borough would be able to meet this obligation.

3.0 General Site Plan Comments

a. Parking is Inadequate.

Given that the residential development is located on over 30 acres of area currently devoted to overflow parking for special racetrack events and the site plan does not provide another location for that overflow parking, it can be assumed that there would not be enough parking for special events at the racetrack and that negative parking implications within on County and Borough streets would result.

b. Traffic Impacts are Unknown.

A traffic impact analysis should be provided to adequately assess the traffic impacts on the surrounding road network and provide the necessary recommendations regarding off-tract improvements required due to the proposed development.



4.0 Development is Not Consistent with the Master Plan

The Borough adopted a Land Use Element Plan of the Master Plan in 2016. There are several goals and objectives within the Master Plan that support the use of Monmouth Park land for emergency operations and housing in the case of a natural disaster. A recommended policy to reduce human vulnerability to emergencies and natural disasters is provided on pages 28-29 and reads:

"The Borough and County do not have the necessary resources to help residents that are in need of longer term housing (beyond 30 days) while the damage to their dwellings is being addressed. The State and Federal government usually help to provide longer term emergency housing. While the Borough has limited capacity to help with the longer term housing, adequate plans should be in place that address the preferred location for longer term housing within the Borough. As part of the Monmouth Park Racetrack Redevelopment Plan, the Borough is providing a locational and schematic layout addressing longer term housing, parking, food and medical distribution services and other service needs."

And

"Monmouth Park Redevelopment Plan - Provide emergency long-term emergency housing location and layout plan at Monmouth Park Racetrack's west parking lot for State and Federal officials use in the setup of long-term emergency shelter."

As indicated, the NJSEA development plan for the west parking lot includes permanent residential housing and would not be available for a long-term emergency shelter or housing. As part of any development plan for Monmouth Park it is recommended that it include accommodations for emergency operations and housing in the case of natural disasters.

Should you have any questions regarding this review memorandum, please contact me directly as I am not available for the July 20, 2023 Borough Council meeting.

C. Jeanne Smith, Borough Clerk
 Andrew Bayer, Esquire, Borough Attorney