



AVALON ENVIRONMENTAL COMMISSION

3100 Dune Drive, Avalon, N J 08202

September 27, 2023

Scott Wahl
Avalon Borough Administrator
3100 Dune Drive
Avalon, NJ 08202

Re: Dune Vegetation Management Plan Approval and Conditions
Vahan Gureghian
5609 Dune Drive
Avalon, NJ 08202

Dear Scott:

After a review of the situation regarding maintenance of the dune vegetation adjacent to 5609 Dune Drive in Avalon NJ, the Environmental Commission has decided that the steps proposed can be carried out according to the detailed plan that has been submitted by the Lomax Group pursuant to the approved Dune Vegetation Management Plan. A copy of this letter is to be included with the Memorandum of Agreement for the project. Certain restrictions are placed on the proposed work:

- Before work is started, the appropriate permits will be obtained from the Borough, the Memorandum of Agreement signed by those participating in the project and escrow funds paid in full.
- The landscaping firm utilized to remove the invasive/damaging vegetation, restore the dunes with native vegetation and install the irrigation system must have demonstrated experience with these activities within dune systems of New Jersey.
- Work must be carried out under the supervision of someone appointed by the Environmental Commission, currently the Lomax Group.
- All work must be done by hand since under the NJ DEP Coastal Jurisdictional Determination, no heavy equipment can be brought into the dune area.
- It is understood that Japanese black pines marked on the diagrams submitted by the Lomax Group will be removed. Dead vegetation in the area will also be cleared.
- Native vegetation including, but not limited to, eastern red cedar trees, American holly, oak, beach plum, groundsel and northern bayberries, in the area will not be removed or damaged.
- Trees that are removed shall be cut at, or slightly above, the dune surface and the roots left in place. Saplings of Japanese black pine that were not part of the project plan are to be clipped just below ground level. Because of their size and location the saplings do not have to be replaced with indigenous vegetation.
- All invasive vines will be bottom pruned from adjacent trees/shrubs adjacent to the planting area.

EXHIBIT B

- Invasive vegetation will be removed with caution to reduce the impact on the dunes and existing native vegetation.
- All plantings will be planted in a compost mix with Terra-Sorb®, or equivalent, mixed at recommended rates.
- An eighty-five (85) percent success rate of newly planted material is expected. The property owner will be responsible for replacing new vegetation that dies within the first two growing seasons.
- The property owner will be responsible for ensuring that adequate watering of the newly planted vegetation occurs through the next two growing seasons after planting has occurred, unless otherwise determined to be necessary. Fixed sprinkler-type irrigation systems will not be used. The irrigation system is supplied by temporary surface tubing and will comply with the Borough ordinance regarding time and days of watering and occur three times a week unless adequate precipitation occurs. It is also recommended that temporary irrigation lines be “blown-out” at the end of the season for maintenance purposes. Irrigation will be stopped and systems removed when it has been determined the planting is successful.
- Mulch shall be applied around all newly planted material. Mulch thickness shall be 2”-3” deep. Natural, not dyed, wood-based mulches and compost mulches are most appropriate for the dune environment, with a one-time application (at the time of planting). The mulch ring shall be confined to within 6” of the root structure of the newly installed plant material. Please note that the “Volcano”-type usage of mulch is not permitted. Mulch shall not be used to cover the entire area of the project. Mulch shall not be replaced after the plants have taken root.
- Once planted the vegetation shall be allowed to grow naturally without pruning, unless otherwise approved.
- All pruning shall be conducted in compliance with ANSI A300 Standard Practices for Pruning.
- Reduction pruning will be the primary method of pruning for native tree and shrub vegetation – see Best Management Practices – Tree Pruning (Revised 2008) for a description of reduction pruning.
- Native trees and shrubs shall not be pruned by more than 10% of their existing foliage. Trees and shrubs shall NOT be topped.

Sincerely,



Donna Rothman
Chair, Avalon Environmental Commission

Cc: Paul Baldini, P.A.
Aaron Baker, The Lomax Consulting Group
Contractor carrying out the project (who shall give a signed receipt to the Borough of having read this letter)
Vahan Gureghian, Project Sponsor