



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

WATERSHED AND LAND MANAGEMENT PROGRAM

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January 31, 2024

VIA EMAIL

Nicholas Long, City Administrator
City of North Wildwood
901 Atlantic Avenue
North Wildwood, New Jersey 08260

Peter Lomax
The Lomax Consulting Group
1435 Route 9 North
Cape May Court House, New Jersey 08210

**Re: City of North Wildwood Pending Permit Application
Division of Land Resource Protection Determination
DLRP File No. 0507-03-0009.6 LUP200001**

Dear Mr. Long and Mr. Lomax:

I am writing on behalf of the New Jersey Department of Environmental Protection's (Department) Division of Land Resource Protection (DLRP) to provide guidance related to the area that is the subject of the above-referenced application with specific emphasis on shore protection measures between 7th and 16th Avenues. This application has been deficient since it was submitted in 2020. Some additional information has been provided since submission, but the application remains deficient while DLRP awaits receipt of critical missing information. Technical review of the application, which proposes, among other things, legalization of the unauthorized bulkhead installed between 7th Avenue and the mid-point between 12th and 13th Avenue (12.5th Avenue) and installation of a new steel bulkhead from 12.5 Avenue to 16th Avenue, cannot proceed without this essential information. Emails dated March 23 and March 28, 2023 between DLRP and North Wildwood (NWW) representatives set forth the needed information.

In the interim and in an effort to move the project forward, please accept the following guidance, which is intended to increase the likelihood that the project will be designed to comply with the Coastal Zone Management Rules. The Coastal Zone Management Rules (N.J.A.C. 7:7) require that shore protection measures be designed in a manner that reduces the impact to the

overall beach and dune system, and that non-structural shore protection be demonstrated to be infeasible before considering structural shore protection alternatives. Sand naturally transfers throughout the season from one area to another in a coastal system; however, when the sand supply is interrupted by the installation of a hard structure such as a bulkhead, this natural ebb and flow is disrupted. Thus, the Department must consider the impact a length of bulkhead installed in one location might have on sand transfer or sand availability on other areas of the beach. For example, the unauthorized removal of dunes/manipulation of the beach berm and installation of bulkhead from 7th Avenue to 12.5th Avenue impacted and eliminated sand reserves from the beach in that area, such that when erosion occurred at 15th Avenue, there was less sand available to feed the beach/dune and replace the eroded sand. The unauthorized manipulation of the beach and dune system, and installation of exposed bulkhead to the north has exacerbated erosion to the south.

To avoid such unintended consequences, DLRP must carefully consider the Coastal Zone Management rules, specifically (but not limited to) the Coastal Engineering rule (N.J.A.C. 7:7-15.11), which requires that non-structural solutions be used where feasible to lessen the impact on the overall beach and dune system; and the Dune rule (N.J.A.C. 7:7-9.16) and Beaches rule (N.J.A.C. 7:7-9.22), which require minimization of any development that would impact the overall dune and beach system. To this end, DLRP recommends the NWW develop the submission of the deficient materials with the following in mind:

1. The relocation of the unauthorized bulkhead from 7th Avenue to 12.5th Avenue as landward as possible will serve to locate the bulkhead the maximum distance from direct wave attack;
2. The placement of rock toe along the waterward face of this bulkhead (if authorized) will absorb wave energy and dissipate wave action preventing erosion during storm surge events that do reach this bulkhead;
3. As discussed previously, the area between 12.5th and 15th Avenue is afforded effective protection by the existing established, vegetated dune system. For the Department to consider the need for structural shore protection within this area, detailed information demonstrating that the use of non-structural methods are not feasible or practicable and that the installation of structural shore protection would not cause adverse impact to the beach and dune system is needed;
4. The placement of rock at the northeastern terminus of the bulkhead at 15th Avenue will absorb wave energy and reduce the potential for wave refraction/erosion of the dune areas immediately to the north;
5. The introduction of sand back into the littoral system would facilitate the gradual feeding of specific erosional areas along NWW's oceanfront. A backpassing project within the area between 7th avenue and 16th Avenue would help ensure the greatest success of incorporating the new sand material into the existing system. The proposal should include a scope of work with the sand volume, placement locations and design, and source and grain size of the sand. The City may also want to consider



providing a schedule that leverages the NWW's current plans for sand placement during the summer, if any.

Should you have any questions, or if you would like to meet to further discuss, please do not hesitate to contact me via email at colleen.keller@dep.nj.gov.

Sincerely,



Colleen Keller, Assistant Director
Division of Land Resource Protection

C: Katrina Angarone, Assistant Commissioner, Watershed and Land Management, NJDEP
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