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Mr. Robert Kozachek, Project Manager
NJDEP
Land Use Regulation Program
Cn 401 Trenton, N.J. 08625

February 19, 2015

Re: Holmdel GAA Complex LLC
26 Main St. Holmdel, NJ Bl. 2, Lots 2 & 26

Dear Mr. Kozachek,

Thank you for speaking with me today about the above project. Because this piece of land is bordered on the west and south by a category one stream, (Willow Brook) and on the east by a tributary of this stream, we think this is a gross overuse of an environmentally sensitive piece of land. Even though it is a 90 acre parcel, only about 60 acres are usable and the possibility of significant runoff due to impervious cover and the toxic chemicals associated with this proposed construction is a major concern of the Concerned Citizens of Stable Development (CCSD).

This site proposes 5 full-size, competition soccer fields paved with artificial turf, 3 grass courts partially in the 300' buffer on the Western side, an enclosed field(for a total of 9 fields), and parking for 406 cars. It would use city water and septic.

The standard construction for these artificial-turf soccer fields includes compacting soils, adding crushed gravel if needed as a leveler, adding up to 6" of asphalt to prevent heaving from the freeze-thaw cycle in the winter, urethane formulated adhesive to bond with the asphalt, 5/8" polyurethane foam base, more glue, and finally the synthetic "grass" with high strength polyester backing. Often this "grass" has "crumb rubber" to add to the cushioning and lessen the impact on players running or falling on this surface. The result of this layering is to prevent water from seeping through to the ground causing heaving, cracking in the asphalt base and possible disrupting the individual layers. It is impermeable.

I have witnessed the steep slopes of Willow Brook behind the homes on Saddle Ridge in Colts Neck after heavy rains. The steep banks are, for the most part, not well vegetated and slump or cleave off large areas of soil down the slopes. Trees also fall easily down these banks.

The proposal of 2 fields encroaching into the 300' Category 1 stream setback would require tree removal, re-grading and disruption of this sensitive area. We strongly urge that trees in this easement, in the 100' flood setback and any other trees by the top of the bank, which might have a negative impact on this stream corridor if they were removed, be required to remain without any disturbance. The fact that the developer has applied to develop these 2 fields because of a "hardship" is only because the developer has created his own hardship. In the January 16, 2015 flood Hazard application to Holmdel Township, the applicant certified that NO work would be done within an easement.

The proposal of 5 full-size competition soccer fields with artificial turf, a proposed indoor stadium, a 40x40' storage/restroom building parking lot for 406 cars, interior roads, and a 10,000 square foot retail area creates an impervious surface of 26 acres out of 60 usable acres. This is a lot coverage of 29% which is unacceptable.

The shoehorning of all these fields on this property does not address the way soccer teams operate in a competition mode. There are 17-20 players on a team plus 1 referee and 2 side referee. 40 players per field and 9 fields equal 360 people. This number does not include coaches or spectators. If a team has a morning event and then another at noon or early afternoon, which is common, the players don't leave the site. There is then the potential, if all fields are in constant use, for about 721 players in this area. And again, this does not account for spectators. Since there is parking for only 406 cars, there are serious questions about where excess parking would be. If buses are intended to be on site, there is no accommodation for them.

Access and egress to a soccer field site is often at different points to handle large numbers of cars entering and leaving in an orderly way. This plan seems to be a large bottleneck without consideration for the heavy traffic that exists in the morning and late afternoon on Main Street, Holmdel. The proposed reduction of

the required environmental buffer of 310 feet, along Lot 2, to just 20 feet is another example of the proposed overdevelopment of this parcel.

We also have concerns about the health and safety of players and chemical damage to our environment. In 2013 the NJ Department of Health and Senior Services “detected dangerously high levels of lead dust on synthetic turf in the state.” The EPA has identified chemicals and carcinogens which could be present in “crumb rubber”: arsenic, chloroethane, latex, lead, mercury, phenol, nickel and isoprene. The “crumb rubber” is also flammable; adding fire retardants just adds to the runoff pollution.

Holmdel Township zoning states a desire to “promote orderly development that protects streams, wetlands, floodplains and associated wetlands.” There are at least 28 soccer fields currently in the immediate area (Holmdel High school, Holmdel Park, Thompson Park, Cross Road Park, Dorbrook County Park in Colts Neck, Colts Neck High School, Five Point Road Field, Bucks Mill Park, Vanderberg Road Park in Marlboro, Front Street Park in Lincroft and Brookdale Community College.)

We sincerely hope that the DEP will agree that this proposal is not necessary and has only negative effects for this property, the people using this site, the neighborhood abutting the surrounding area and the category one stream.

Sincerely,
/Julie McGowan/
Julie McGowan, CLA, CTE

Cc: Mayor Eric Hinds
Thomas King, Planning Board Chairman
Bonnie Heard, PE, Township Engineer
Jennifer Beahm, PP/AICP, Township Planner
Martin F. Pflieger, Esq., Board Attorney