

Draft Comments from the Historic Preservation Commission
To the Neptune Township Zoning Board of Adjustment
Regarding the proposed change of use application related to
23 Webb Avenue

To be reviewed at the 8 October 2024 Meeting of the HPC

We are writing to the Zoning Board of Adjustment in the matter of 23 Webb Avenue. The applicant is seeking a use variance to "convert a single-family home to a bed and breakfast 'homestay.'"

According to the historic Sanborn Insurance maps, this property has existed as a single-family residence on this plot of land since at least 1890 (the earliest available map). At 134 years old, the age of this house places it firmly in what is referred to as the "period of significance" (i.e., 1890-1910). Buildings dating to this time are the most historic, most architecturally valuable, and most closely scrutinized of all structures in the Historic District. This is true of 23 Webb Avenue, which is one of the earliest and best exemplars of the Eastlake Stick Style, for which Ocean Grove is famous.

Include photo of the building and photo of 1890 Sandborn map.

Upon closer examination of the application, however, it does not appear to propose creating a bed and breakfast. As the "The Avakian Rev#1" itself notes, there are no common spaces proposed, no bathroom or kitchen facilities associated with the "owner's bedroom", and the facility is not a "rooming house" or "boarding house" as defined by J.J.S.A. 55:12B-3. The document further notes that two existing, and it bears noting, historic, bed and breakfast structures already exist in this area (at Lot 17, directly to the west, and at the Cordova Bed and Breakfast, directly across Webb Avenue).

It is our contention the applicant is proposing to change a single-family residence into something unusual and entirely unheard of in the Ocean Grove historic district, a building consisting only of bedrooms and bathrooms. Such a configuration sounds suspiciously like a motel (i.e., "a roadside dwelling consisting of rooms with nearby parking").

To create this new type of use, the applicant has outlined changes to the exterior that would result in irreparable architectural disfigurement by damaging many of the character-defining aspects that make the building historically significant in the first place. This is neither hyperbole nor speculation. One need only review the "Architectural Plans – 27 Webb," submitted for review. These plans indicate the scope of work they wish to do, including the following:

- Convert a historic one-family historic cottage into a 5-unit bunkhouse with three separate entrances.
- Replace all historic wooden windows/window frames.
- Alter the height a portion of the existing historic roof.
- Raise railing from their historic heights.
- Install new, solid, Stanley, 24-gauge steel exterior doors.
- Eliminate completely historic fenestration openings in multiple locations.
- Cut new fenestration openings into the building at non-historic locations.
- Build and/or alter exterior stairs, newels, balusters, porch decks, and stair rails at multiple locations.

Nowhere in the submission is there any mention of preserving or restoring and of the elements of this house that are protected by the Historic Guidelines. To be clear, all of the proposed exterior changes

listed above are subject to broad restrictions or, in most cases, are outright prohibited by the Preservation Guidelines.

Some of the “proposed” alterations, (including changing the shape of historic window openings, installing new vinyl windows, cutting a new opening in the historic facade, installing a solid metal door, and adding new raw-wood stairs, a landing, and stair rails) have *already* been done by the applicant without obtaining the required Certificate of Appropriateness from the HPC. The applicant has indicated they were unaware such a Certificate was required.

To their credit, once made aware by the Township, (in January 2024) that a Certificate of Appropriateness was needed, the applicant did contact HPC and expressed interest in remediating these unapproved non-conformities. However, no such remediation has yet been proposed or performed and the non-conformities, as of this writing, remain in place. **Damage has already been done to this structure and no plan has been submitted to HPC on how the applicant plans to undue these modernizations and return the house to its historic conditions.**

To be clear, HPC’s concern does not arise from any of these prior infractions, mistakes do happen; homeowners are sometimes unaware of the scope of the Preservation Guidelines. While HPC holds no animus toward the applicant, we are alarmed at the prospect that by granting a variance of this kind, all historic structures in the district might, at the swipe of a pen, be irreparably compromised while, at the seam time, become subordinate to another, unrelated, and wholly independent, “building next door.” **Such a variance would undermine the very thing that makes a single-family home “single-family,” chiefly its integrity as an architecturally distinct, stand alone, and protected structure within the historic district.**

Further, granting this variance would suggest that anyone owning two or more houses in the Historic District, could, by dint of a similar variance, turn a public street into a private compound; turn a group of individual structures, into a campus; or turn a neighborhood into a personal subdivision by carving out a sprawling person and exclusive group of buildings from the streetscape. Under such a scenario, the very notion of Ocean Grove as a collection of unique, individual, historic structures would change forever. It could become, instead, a collection of satellite homes tethered to other, “mothership” homes intended to provide kitchens and public spaces.

It has long been the rule that homeowners in possession of a multi-family structure within the Historic District may keep their multi-family designation. Those choosing to convert multi-family structures into single-family structures, though, have been advised that doing so is a one-way ticket; there’s no going back to a multi-family. To the best HPC’s records, never has a single-family structure been magically transformed into a multi-family dwelling by simply removing its kitchen and designating a “shared common kitchen someplace else within walking distance.

Larger questions arise when one considers the lifespan of the structures in Ocean Grove where buildings are routinely 100 years old or older. How are such structures to exist in a timeline of this sort? Would such abbreviated, kitchen-less structure as 23 Webb be granted “kitchen privileges to 27 Webb in perpetuity.

The HPC Guidelines open by stating, *“The Objectives of Ocean Grove Historic District - Architectural Design Guidelines for Residential Structures, are to preserve the historic architectural integrity, craftsmanship and heritage of the Nationally Designated Historic District and encourage architectural solutions which will Recapture the Spirit of Ocean Grove.”*

Granting this variance will result in the whole-sale destruction of irreplaceable architectural elements on one of the oldest and most important 19th century homes in Ocean Grove. Such a variance would be precedent setting in the worst way. For these reasons, HPC petitions the ZBA to uphold the single-family designation of this historic home and to deny this application.