



**Principals**  
 Richard Rehmman, GISP  
 Richard Heggan, PLS, PP  
 Jeffery MacPhee, PLS  
 Carolyn A. Feigin, PE, PP

December 11, 2024

Lance B. Landgraf, Jr., PP, AICP  
**Casino Reinvestment Development Authority**  
 Division of Land Use and Regulatory Enforcement  
 15 S Pennsylvania Avenue  
 Atlantic City, NJ 08401

Re: COMPLETENESS REVIEW #2: CRDA # 2024-05-3649  
 Minor Site Plan w/ Variance Approval  
 Zaza Dispensary LLP  
 12 S. Virginia Avenue #1 (Block 136, Lot 7)  
 Atlantic City, NJ 08401  
 ARH # 2410100.01

Dear Mr. Landgraf:

**ARH ASSOCIATES** has reviewed the following information towards issuance of compliance with the required application items within the CRDA’s Checklist(s) for the above-referenced Application:

TITLE / DESCRIPTION	PREPARED / SIGNED / SEALED BY	DATE	DATE LAST REVISED
CRDA Land Use Application	Owner / Applicant	08/27/2024	
Escrow Setup Information			
Four (4) Color Photographs of Site			
Marketing Strategies		Undated	
Security Plan			
Commercial Lease			05/15/2024
Minor Site Plan Checklist (Form #5)	Daniel J. Gallagher, Esq.	09/03/2024	
Response Letter	Daniel J. Gallagher, Esq.	11/27/24	
Property Survey & Variance Plan	Arthur Ponzio Co.	08/20/2024	10/19/2024
Architectural Floor Plans	Graphite Architecture & Interiors	08/15/2024	10/28/2024
Resolution No, 441	City of Atlantic City	06/12/2024	
Resolution No, 328		04/17/2024	
Letter of Support		09/04/2024	
200’ Property List		07/16/2024	
Certification of Taxes Paid		03/22/2024	
Memorandum of Understanding	South Jersey Building and Construction Trades Council	08/22/2024	
Letter of Support to CRC	United Food and Commercial Workers International Union	Undated	
Labor Peace Agreement	United Food and Commercial Workers Union	08/22/2024	

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Per this information, our office offers the following comments:

**I. PROJECT INFORMATION & CONTACT INFORMATION**

The 7,775 SF site is a through lot with frontage on Virginia Avenue and Gordon’s Alley. The site is presently developed with a three-story building of unknown use(s) fully encompassing the lot. The Applicant seeks approval to construct a cannabis retail facility on a portion of the first floor. An internal vehicle loading area and entry improvements are proposed.

Below please find the contact information for the responsible parties associated with this Application:

<b>APPLICANT</b>
Zaza Dispensary LLP Tyrone & Dashnay Holmes 7 Equinox Lane Freehold, NJ 07728 Phone: 215-880-5560 Email: <a href="mailto:dashnayholmes@gmail.com">dashnayholmes@gmail.com</a>

<b>OWNER</b>
Dutchtown 7 LLC Eyal Arev 1317 Edgewater Drive, Suite 388 Orlando, FL 32804 Phone: 609-876-9139 Email: <a href="mailto:al@izonamerica.com">al@izonamerica.com</a>

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**ENGINEER/PLANNER**

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**ATTORNEY**

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**II. COMPLETENESS REVIEW**

The following addresses conformance with the CRDA's Checklist(s) only and does not reflect adequacy of submissions for review purposes. The Applicant has requested waiver(s) from checklist(s) items as noted below. Furthermore, deficiencies from checklist(s) items that have not been requested a waiver from are also noted below:

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Minor Site Plan Checklist (Form #5)

ITEM	MINOR SITE PLAN CHECKLIST	Provided in Resubmission	Waiver Requested by Applicant / Not Provided	Comments
6	Project narrative describing existing conditions, surrounding uses and the proposed development including list of variance and design waiver relief sought, if any	X		A response letter has been provided to address the project narrative. The submitted letter recaps previous uses for the space but does not explain the specifics. The proposed use is stated, and the applicant has not identified any proposed variance(s) required.
11	Zoning Schedule listing: Use, lot area, lot width, lot depth, yard setbacks, floor area ratio, density, building coverage, building height and parking requirements, including existing and proposed with conformity status of each.		X	The Applicant shall provide an analysis of the existing parking requirements for the existing use area on site which is to be renovated into the proposed retail dispensary. The architectural plans indicate 17 existing spaces are grandfathered but this is not mentioned on the site plan. The calculations for the required parking spaces in relation to the floor area for the existing and proposed uses shall be provided on the Property Survey & Variance Plan.

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ITEM	MINOR SITE PLAN CHECKLIST	Provided in Resubmission	Waiver Requested by Applicant / Not Provided	Comments
20	Land Title Survey and topographic survey depicting existing conditions prepared by New Jersey licensed professional land surveyor. All elevations shall be based on NAVD 1988. The horizontal datum shall on the NJ State Plane Coordinate System (NAD 1983) Survey shall include all existing conditions, including buildings, structures, parking areas with parking space striping, driveways, walkways, fences, stoops, stairs, porches, easements, walls, patios, curbs, roof overhangs, overhead wires, bay windows, building setbacks of building on-site and adjoining the site, landscape areas, trees, utility poles, flag poles, directional and identification signs, spot elevations, contours in one foot intervals, FEMA Flood Zone, State Claim areas, utility poles, utilities such as water, sanitary sewer, storm sewer, electric, gas, cable, telephone, etc. Improvements in adjoining right-of-ways / roadways / streets including painted traffic markings.		X	The Property Survey does not contain topography or the FF elevation of the building. The Applicant is proposing pedestrian and vehicular access improvements with their submission with no topography provided. A topographical survey shall be provided as a condition of approval.

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ITEM	MINOR SITE PLAN CHECKLIST	Provided in Resubmission	Waiver Requested by Applicant / Not Provided	Comments
22	Site Plan depicting proposed buildings, structures, existing and proposed building setbacks, landscape areas, location of identification signage and directional signs, trash enclosure, building setback lines (dashed) and their dimensions from the property lines, parking area plan showing spaces, size and type, aisle width, curb cuts, drives, driveways, and all ingress and egress areas and dimensions.	X		<p>The site plan has been revised to show the proposed curb cut into the site's loading/ delivery area and the ramp under the covered entry into the building.</p> <p>The Applicant has stated that no new signage is proposed at this time. The Applicant shall provide testimony regarding the need for signage during the hearing.</p>
23	Grading plan depicting direction of flow of surface run-off, spot elevations, contours within 1 foot intervals, stormwater management structures.		X	<p>The Applicant has requested a waiver from providing a grading plan, but it is not clear if this is necessary as no existing topography has been provided to demonstrate if the proposed vehicular and entry access improvements into the site can work. Our office accepts this waiver request for completeness purposes; however, our office may request the grading plan as a condition of approval if deemed necessary during technical review.</p>
24	Landscaping Plan, details, and plant schedule (19:66-7.6)		X	<p>Our office accepts this waiver request from providing a landscaping plan as the site is fully impervious coverage and no landscaping is existing or proposed.</p>

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25	Lighting Plan and details (19:66-7.10)	X		The Applicant has provided existing and proposed lighting fixture locations and details on the architectural plans Exterior Elevations and Security plan sheets.
26	Soil Erosion and Sediment Control Plan. (Required for soil disturbance of 5,000 sq. ft or greater)		X	Our office accepts this waiver request as the site does not disturb soils in excess of 5,000 sf.
27	Plans of proposed utility layouts including sanitary sewer, water, gas, telephone, cable and electricity and showing proposed connections to existing or any proposed utility systems.	X		The revised plans state that no new utility connections are being proposed.
29	Solid and liquid waste management plan.	X		The interior refuse area for cannabis waste has been provided on the architectural plans (Construction Plan, A-102.00).
30	Vehicular and pedestrian circulation patterns, Traffic control signs, directional signs and Sight triangles		X	Our office accepts this waiver request as long as it is sprinter vans or vehicles of a equivalent size or smaller that are making pickups and deliveries to the site. If larger vehicles are anticipated, a vehicular circulation plan shall be provided.

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31	Preliminary architectural plan and elevations, and areas and type of each proposed use.	X	X Partial not provided	Architectural floor plans have been revised and elevations have been provided to show the exterior façade renovations. The height of the building is greater than 35' in height, but no changes have been made to the required setbacks and building's conformance on the Site Plan and shall be addressed as a condition of approval.
34	Performance guarantee [19:66-3.4 (b)]		X	Our office accepts this waiver request as a completeness item. However, as there will be improvements in Gordon's Alley ROW for the proposed driveway, performance and maintenance guarantees will be required for final approval.
35	Maintenance guarantee (19:66-16.3)		X	

The Applicant has requested relief from variance(s) on their application form but do not indicate the nature of the variance(s). It appears there are no variance(s) necessary as existing non-conformities are not being exacerbated.

Per our review of the Checklist, the Applicant has satisfied all other submission requirements, and no additional waivers appear necessary.

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### III. RECOMMENDATIONS

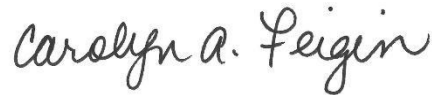
We recommend that this application be deemed **COMPLETE**, although there are items to be addressed as conditions of approval, should the Board act favorably on the application. Additional commentary will be provided during the technical review portion of this project.

If the Applicant should have any questions or comments, please do not hesitate to contact me at 609-561-0482 ext. 5005 or by email at [cfeigin@arh-us.com](mailto:cfeigin@arh-us.com).

Respectfully Submitted,

**ARH ASSOCIATES**

By



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Carolyn A. Feigin, PE, PP  
CRDA Consulting Engineer

cc: Robert L. Reid, AICP, NJPP  
Christine A. Nazzaro-Cofone, AICP, PP  
Scott Collins  
Tetje Linsk

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