



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

December 30, 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: TECHNICAL REVIEW #1: CRDA # 2024-11-3739  
Minor Site Plan w/ Variance Approval  
Nancy Claude  
30 S. Florida Avenue (Block 166, Lots 20, 22, 29, & 30)  
Atlantic City, NJ 08401  
ARH # 2410103

Dear Mr. Landgraf:

**ARH ASSOCIATES** has reviewed the following information towards issuance of Minor Site Plan with Variance Approval for the above-referenced Application:

TITLE / DESCRIPTION	PREPARED / SIGNED / SEALED BY	DATE	DATE LAST REVISED
CRDA Land Use Application	Owner / Applicant	10/23/2024	
Escrow Setup Information			
Project Narrative		11/01/2024	
Minor Site Plan Checklist (Form #5)		11/10/2024	
Property Survey	Arthur Ponzio Co.	02/15/2022	
Site and Floor Plans	Craig F. Dothe Architect, LLC	08/22/2024	09/27/2024
Parking Designation Letter	Sonraj LLC	08/19/2024	
Property Deed	Steven M. Abramoff, Esq.	07/25/2024	

Per this information, our office offers the following comments:

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## I. PROJECT INFORMATION & CONTACT INFORMATION

The 13,700 SF site is a through lot with frontage on Florida Avenue and Bellevue Avenue. The site is presently developed with a 2-1/2 story building with a restaurant/bar and two retail uses on the first floor, residential apartments above, and an onsite parking lot. The Applicant seeks approval to convert the first floor uses into a banquet hall. Landscaping and refuse area improvements are proposed for the parking lot.

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

APPLICANT/OWNER
Nancy Claude 30 S. Florida Avenue Atlantic City, NJ 08401 Phone: 215-715-1871 609-697-0999 Email: <a href="mailto:claudenancy@ymail.com">claudenancy@ymail.com</a>

ARCHITECT/PLANNER
Craig F. Dothe 33 N. Brighton Avenue Atlantic City, NJ 08401 Phone: 609-348-2236 Email: <a href="mailto:craig@cfidarchitect.com">craig@cfidarchitect.com</a>

## II. ZONING REVIEW

The subject property is situated within the Resort Commercial (RC) zoning district. Restaurants, Catering Services, Multi-family residential mid-rises and mixed uses are

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permitted uses in the zone. The below table summarizes the bulk requirements for this zone:

BULK ITEMS	REQUIREMENT	EXISTING	PROPOSED
Max. Principal Building Height	3000 ft (from BFE)	25.9 ft	NC
Min. Lot Area	7,500 sf	13,700 sf	NC
Min. Lot Depth	150 feet	165 feet	NC
Min. Lot Width	50 feet	46.25 feet (ENC)	NC
Min. Lot Frontage	50 feet	46.25 feet (ENC)	NC
Min. Principal Front Yard Setback (< 35' in height)	0 feet	Building: 0 feet Overhang: 3.14 feet over (ENC)	NC
Min. Principal Side Yard Setback (< 35' in height)	0 feet	0.25'	NC
Min. Principal Rear Yard Setback	20 feet	N/A	N/A
Max. Building Coverage	70 %	33.5 %	NC
Max. Impervious Coverage	80 %	98.4 % (ENC)	NC

N/A = Not Applicable; NC = No Change; ENC = Existing Non-Conformity;  
 NP = Not Provided; TBP = To Be Provided; **V = Variance Required**

PARKING	REQUIREMENT	REQUIRED	PROPOSED
Restaurants	Greater of: 1 space per 30% capacity (TBP) OR 1 Space per 150 SF (3,897 sf)	TBP	0 Spaces (See Comment III.B.1. below)
Residential (1-BR)	1.8 spaces per unit (2 units)	4 spaces	
Residential (2-BR)	2.0 spaces per unit (1 unit)	2 spaces	
TOTAL		TBP	

The Applicant has requested the following variances with their application:

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- a. Section 19:66-5.8 – Where 32 parking spaces are required, whereas 23 parking spaces are grandfathered and 17 spaces are existing on site and to remain, creating a deficiency of 9 parking spaces. However, our office requests clarification regarding the calculated methods used for the existing restaurant and proposed banquet hall. Please See Engineering Comment B.1 below for clarification.

The Applicant should be prepared to provide testimony to the Board in support of the requested variances.

### **III. ENGINEERING COMMENTS**

#### **A. GENERAL**

1. Right of way widths of adjacent public roadways shall be provided on the site plan.
2. The site plan shall be revised to provide the missing tax map sheet # and the block and lot(s) as a condition of approval.
3. The site plan shall be revised to contain a north arrow and graphic scales.
4. The site plan shall be revised to provide the CRDA professionals signature block on the first sheet adjacent to the plan's title block.
5. The site plan shall be revised to provide key maps showing surrounding existing features, zoning, and tax lots. This can be achieved by providing an aerial image, the CRDA zoning map, and the tax map with a 200' radius around the lot.

#### **B. PARKING, LOADING, & CIRCULATION**

1. As per N.J.A.C. 19:66-5.8, for restaurants, the greater of one (1) parking space per 30% capacity or one (1) parking space per 150 sf is required. Per RSIS, 1.8 spaces are required for one-bedroom apartments and two (2) spaces are required for a two-bedroom apartment. Two (1) one-bedroom apartments and one (1) two-bedroom apartment exist and are to remain, requiring six (6) parking spaces. The Applicant shall provide the calculations for the existing restaurant and proposed banquet hall based on capacity vs floor area to demonstrate the greater of the two methods. This impacts the deficient parking variance for the site. Our office cannot provide an accurate analysis of the deficiency of parking until the parking calculations on the Site Plan are revised accordingly.
2. The Applicant shall demonstrate there is ADA access into the building. There

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appears to be a step up into the building in the proposed S. Florida front elevation view which will prevent ADA access into the building. Also, it does not appear any parking stalls are designated for ADA. At least one parking stall on-site shall be a van-accessible ADA stall with the appropriate signage.

3. Traffic circulation / traffic arrows shall be provided on the site plan. Is the S. Florida Ave driveway to be one-way or two-way access?
4. It is unclear if existing striping is to remain or if new striping and pavement markings are proposed. This shall be depicted on the site plan.
5. Sight triangles shall be provided for all driveways in accordance with N.J.A.C. 19:66-7.4. The Applicant is asked to reanalyze the placement of any structures/plantings when providing sight triangles on the plan.
6. The Applicant shall demonstrate if a vehicle can access parking space #'s 5 & 6 as depicted on the site plan as there are structures and end walls possibly impeding their entry/exit.
7. It appears no new parking areas or reconstruction to existing parking areas are proposed, if so then no EV parking is required.
8. The Applicant shall provide testimony regarding if any spaces are to be designated for the residential or the banquet use on site. If so, proper designation signage shall be provided on the site plan.
9. The Applicant shall provide testimony on the loading operations, including location and size of loading vehicles, for the first-floor banquet use.
10. The Applicant shall clarify if protective structures, i.e. bollards, are to be proposed along the perimeter/at the corners of the subject building and/or adjacent buildings.
11. The Applicant shall provide testimony regarding refuse collection operations for the site for both the banquet and residential uses. Is a refuse vehicle to access the site? Are the bins depicted on the site plan to be designated for each residential unit and the banquet facility? Will it be private or public refuse collection? If necessary, a refuse collection vehicle circulation plan shall be provided.
12. Testimony regarding emergency vehicle circulation for the subject site shall be provided.
13. The Applicant shall clarify where the parking lot is as referenced in their agreement letter from Sonraj LLC. Testimony shall be provided regarding if the subject parking lot has sufficient parking or is part of any prior/ongoing CRDA approvals.

### **C. SITE LAYOUT**

1. A reduced size scanned copy of the Survey has been provided. A full-size

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legible copy of the Survey shall be provided. The site plan shall be revised to match the survey as there are discrepancies in the locations of existing structures between the plan and survey.

2. The site plan shall be revised to clearly depict what is existing vs what is proposed.
3. The site plan shall be revised to depict the surfaces of ground covers such as pavement, concrete, grass/mulch areas etc. Testimony shall be provided about the conditions of existing on-site surfaces and if they are to be resurfaced.
4. The site plan shall be revised to provide dimensions of curb cuts/driveway entrances, sidewalks, parking stalls, access aisles, etc.
5. The Applicant shall provide testimony of the fencing in compliance with N.J.A.C. 19:66-7.7. Is access from Bellevue Avenue to be restricted via a gate? If so, this shall be depicted on the plans. Fencing details shall be provided.
6. The Applicant shall provide testimony regarding the condition of existing sidewalk, curb, and gutter along the project frontages. If in disrepair these shall be replaced.
7. Elevation views of the rear (Bellevue Avenue frontage) and the sides shall be provided.
8. The FF and building height as measured from the BFE shall be provided on the plans and/or building elevations.

#### **D. LANDSCAPING, LIGHTING & SIGNAGE**

1. The site plan shall be revised to provide quantities and the exact species for the plant schedule as per N.J.A.C. 19:66-7.6. If non-tree vegetation is to be proposed (i.e. shrubs or flowers), the appropriate planting detail in addition to the tree planting detail shall be provided. Testimony shall be provided regarding the proposed landscaping conformance with N.J.A.C. 19:66-7.6.
2. The site plans shall be revised to provide the schedule and statistics of the existing modeled lighting in order to know the light fixture, mounting height, etc. The Applicant shall provide testimony regarding the lighting's compliance with N.J.A.C. 19:66-7.10. House side shields shall be provided for any lighting spillage beyond the property line. Are any building mounted lights proposed?

#### **E. DETAILS & MISCELLANEOUS**

1. It appears the Applicant is proposing signage at the front S. Florida building elevation. Additional details of these signs shall be provided. The Applicant shall provide testimony if any additional signage is to be provided along any other building elevations especially near the door at the Bellevue Avenue

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frontage. The Applicant shall demonstrate compliance with the proposed signage in accordance with N.J.A.C. 19:66-5.7.

2. Construction details shall be provided for all proposed site improvements.
3. All improvements in the City's ROW including signage, building overhangs, and planter boxes/curbing shall require a revocable license from the City.
4. Our office reserves the right to additional technical review comments upon resubmission of revised plans.
5. Three (3) additional photos from different viewpoints shall be provided as a condition of approval. These do not need to be placed on the plans.

#### **IV. COFONE CONSULTING PLANNING REVIEW**

##### **Zoning Compliance**

The property is located in the Resort Commercial (RC) District. As stated at CRDA Land Development Rules Section at N.J.A.C. 19:66-5.10, the purpose of the RC District is as follows:

The purpose of the RC Resort Commercial District is to provide an array of land uses that will capitalize on the zoning district's geographical advantages of the zoning district's proximity to the boardwalk and the Atlantic Ocean. The Resort Commercial District also offers the highest intensity residential offerings within the Tourism District with a variety of supportive commercial and services uses. The vision is to create an environment where residential and resort offerings seamlessly integrate.

The proposed mixed-use (banquet hall and existing apartments) is permitted in the RC District, which permits, relevant to this application, "indoor and outdoor restaurants," "catering services," and "mixed uses."

##### **Master Plan Review**

The subject property is located within the Atlantic City Tourism District. Pursuant to the New Jersey CRDA Atlantic City Tourism District Master Plan, the overall intention and vision is to "reinvigorate Atlantic City in the near-term as the leading resort destination in the Northeast and beyond (Page 4, New Jersey CRDA Atlantic City

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Tourism District Master Plan). Among others, overarching objectives are to “develop an economically viable and sustainable tourism district” and “[expand] Atlantic City’s tourism and economic bases” (Id, Page 1-2).

### **Planning Analysis and Issues for Consideration by the Board**

In regard to the “c” variance, the Municipal Land Use Law (MLUL) at NJSA 40:55D-70c sets forth the standards for variances from the bulk regulations of a zoning ordinance. A “c(1)” variance is for cases of hardship due to factors such as shape or topography, or due to “an extraordinary and exceptional situation uniquely affecting a specific piece of property or the structures lawfully existing thereon.” A “c(2)” variance may be granted where the purposes of zoning are advanced and the benefits of deviating from the ordinance requirements outweigh any detriments. The benefits derived from granting a “c(2)” variance must include benefits to the community as a whole, not just to the applicant or property owner. A “c” variance application also must address the “negative criteria.”

We offer the following for your consideration in reviewing the Application:

- 1) The Applicant’s professional planner shall provide the required statutory proofs for the proposed variance.
- 2) The Applicant’s architect shall provide detailed testimony relative to the proposed design, materials, lighting, landscape architecture, signs, and curb appeal elements. Relative to signage, the Applicant shall discuss design and lighting.
- 3) The Applicant has provided a general narrative about the proposed site usage. The Applicant shall provide detailed testimony about the layout, operations, and function of the proposed uses in the building.
- 4) In terms of the parking deficiency, the Applicant shall provide testimony about how the shortfall will be accommodated. We note that the applicant has an agreement with the principal of Sonraj LLC for "up to 20 parking spots if needed," per a letter dated August 19, 2024. There are also multiple parking options in the surrounding area, as well as the availability of transit and ride-share.

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- 5) The Applicant shall discuss how loading will be accommodated and the types of trucks expected.
- 6) The applicant shall provide testimony regarding proposed security and the adequacy of egress/escape points during a fire.
- 7) The Applicant shall discuss how the application will advance the intent of the New Jersey CRDA Atlantic City Tourism District Master Plan and the Tourism District.
- 8) The Applicant shall comply with the conditions of all previous approvals received for the site.
- 9) The Applicant shall furnish any resolution and/or prior approvals from, and agreements with, the City of Atlantic City, if any.

## **V. POST APPROVAL CONSIDERATIONS**

Should the Board grant the desired approval for this Application, Applicant, and/or its professionals must:

- A. Submit any required revisions to the Board as outlined above for review.**
- B. Obtain approvals from all outside agencies, if necessary. Provide copies to the Board.**
- C. Contact the Board Secretary to reconcile any outstanding review escrow accounts prior to Final Plan Certification, Signature, or the issuance of building permits, as applicable.**

Any resubmissions in response to this report should be accompanied by a point-by-point response to all items. To facilitate the Board's decision-making process, Applicants are strongly encouraged to resolve as many items as possible prior to the hearing on this matter.

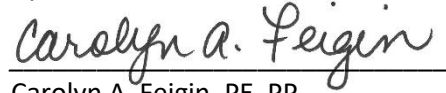
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Respectfully Submitted,

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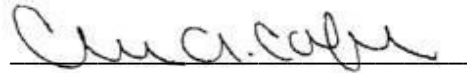
By



Carolyn A. Feigin, PE, PP  
CRDA Consulting Engineer

**COFONE CONSULTING GROUP**

By



Christine A. Nazzaro-Cofone, AICP, PP  
CRDA Consulting Planner

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