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January 21, 2025  
31623 61

Re: ACC - Atlantic City Cannabis, LLC (CRDA Application #2024-07-3662)  
**Minor Site Plan with Bulk Variances  
Completeness Review #2**  
1714 Atlantic Avenue  
Block 156, Lot 36  
Atlantic City, NJ, 08401

Lance B. Landgraf, Jr., AICP, PP, Director of Planning & Development  
Casino Reinvestment Development Authority  
15 South Pennsylvania Avenue  
Atlantic City, NJ 08401

Dear Mr. Landgraf:

Revised / supplemental information for an application for a Minor Site Plan with Variances has been received for the subject premise:

### **Applicant Information**

- Applicant: ACC - Atlantic City Cannabis, LLC  
3 Sloop Court  
Atlantic City, New Jersey 08401
- Owner: Center City Deli, Inc (Block 156 Lot 36)  
1714-1716 Atlantic Avenue  
Atlantic City, New Jersey 08401
- Owner: Boardwalk Piers 3, LLC (Block 156 Lots 22 & 23 for customer parking/loading/unloading)  
2050 Centner Ave #400  
Fort Lee, NJ 07024  
  
B & B Parking (assumed operator for Boardwalk Piers 3, LLC)  
116 Park Place  
Atlantic City, NJ 08401
- Attorney: Joshua M. Lurie, Esquire, and Adam P. Burns, Esquire  
Shapiro, Croland, Reiser, Apfel & Di Iorio, LLP  
Continental Plaza II  
411 Hackensack Avenue  
Hackensack, New Jersey 07601

- Engineer Trevor Curtis, PE  
L2A Land Design, LLC  
66 Grand Avenue, 2nd Floor  
Englewood, New Jersey 07631
- Planner Nicholas Graviano  
Graviano & Gillis Architects & Planners, LLC  
P.O Box 3341  
Long Branch, New Jersey 07740
- Architect: Corey Buchholz  
GRA Design Studio  
1924 Rt 22 East  
Bound Brook, New Jersey 08805

### **Documents Submitted**

1. CRDA City of Atlantic City Land Use Application, dated June 28, 2024.
2. CRDA City of Atlantic City Cannabis Use Zoning Letter (Form #14), undated.
3. Site Plan titled “ACC - Atlantic City Cannabis, LLC, Minor Site Plan”, prepared by Trevor Curtis, PE, of L2A Land Design, LLC, dated June 27, 2024, last revised December 13, 2024, and consisting of the following sheets:
  - a. Sheet C-01 Site Plan
  - b. Sheet C-02 Lighting & Circulation Plan
4. Architectural plans, prepared by Corey Buchholz, of GRA Design Studio, dated June 26, 2024, consisting of the following sheets:
  - a. “Sheet A-1 Proposed Floor Plan”
  - b. “Sheet A-2 Proposed Security Plan”
5. Lease Assignment for 1714 Atlantic Avenue, Atlantic City, Consisting of 53 pages, dated August 1, 2023.
6. Amendment to Lease Assignment for 1714 Atlantic Avenue, Atlantic City, Consisting of 4 pages, dated August 28, 2023.
7. Resolution of Support by Atlantic City Council, Resolution No. 656, adopted August 24, 2023.
8. Deed dated March 20, 2001, transferring ownership of Block 156 Lot 8 (1714 Atlantic Avenue) to Nael Zumot and Mousa Dababneh d/b/a Center City Deli, Inc. consisting of 4 pages.
9. Tax Bill for Block 156 Lot 8 (1714 Atlantic Avenue), dated November 1, 2023.
10. NJCRDA Checklist 5, Prepared by Adam P. Burns, Esq., dated October 17, 2024
11. NJCRDA Checklist 12, Prepared by Adam P. Burns, Esq., dated October 17, 2024
12. Title Report by Action Title Research, for 14 S Martin Luther King Boulevard, Block 156 Lot 22
13. Agreement between B & B Parking, Inc. to lease two (2) parking spaces for a term ending September 30, 2025, to Atlantic City Cannabis, LLC at 18 S Martin Luther King Boulevard, Block 156 Lot 23, **unsigned**.
14. Letter from Nael Zumot to CRDA, dated December 3, 2024.

### **Project Description and Background**

An application has been submitted by Atlantic City Cannabis, LLC which is a proposed Class 5 Cannabis Retailer and requires licensing from the NJ Cannabis Regulatory Commission (CRC) in addition to appropriate land use approvals. The site is approximately mid-block, on the south side of Atlantic Avenue between Martin Luther King Boulevard and Indiana Avenue. It appears that the Applicant proposes access and parking agreements for two (2) parking spaces in an unstriped parking lot behind the building on Block 156 Lot 22 (14 S Dr. Martin Luther King

Boulevard). The Applicant proposes to lease the second floor of 1714 Atlantic Avenue (above Center City Delicatessen) and is seeking a Minor Site Plan with Bulk Variance approval.

This site is located within the CBD Zoning District and is also within the Green Zone Redevelopment Area. The adopted Green Zone Redevelopment Plan permits the proposed Class 5 Cannabis Retailer. The only improvements appear to be interior building renovations.

According to the Site Plan submitted, the loading and unloading of products and cash will occur via a parallel parking space along Atlantic Avenue in front of the business (Option #1) or a through an agreement with B&B Parking for use of two (2) parking spaces behind the building from 14 S Dr. Martin Luther King Boulevard (Block 156 Lot 22). The application proposes to store all cannabis and non-cannabis waste and recycling in designated areas within the cannabis retail operation before collection. A trash enclosure is illustrated on the Site Plans at the rear of the building, presumably for the storage of waste and recycling prior to the pickup of those items.

**Zoning**

The Applicant has indicated that the current proposal does not exacerbate several non-conforming existing conditions, including lot area, building coverage, impervious coverage, lot width, and lot coverage. Variance relief appears to be required for the number of off-street parking spaces to be provided, based upon the information provided by the Applicant. No information has been provided with respect to the proposed business identification signage. The following is a summary of the bulk standards and off-street parking requirements for the site:

**BULK STANDARDS – CBD ZONING DISTRICT**

19:66-5.12(a) 1. i.	BULK REQUIREMENTS PER NJAC 16:66-5.12(A)(IV) (CBD - CENTRAL BUSINESS DISTRICT)	PERMITTED	EXISTING	PROPOSED	STATUS
19:66-5.12(a) 1. iv (1)	Maximum Height (Principal Building) (FT)	65	Less than 65	Less than 65	C
19:66-5.12(a) 1. iv (2)	Lot Area (SF)	5,000	3,500	3,500	ENC
19:66-5.12(al 1. iv (3)	Lot Depth (FT)	100	125	125	C
19:66-5.12(a) 1. iv (4)	Lot Width (FT)	50	28	28	ENC
19:66-5.12(a) 1. iv (5)	Lot Frontage (FT)	50	28	28	ENC
19:66-5.12(a) 1. iv (6)	Maximum Building Coverage	30%	60%	60%	ENC
19:66-5.12(a) 1. iv (7)	Maximum Impervious Coverage	80%	60%	60%	C
19:66-5.12Cal 1. iv (8)	Minimum Front Yard Setback (FT)	5	0	0	ENC
19:66-5.12(a) 1. iv (9)	Minimum Side Yard Setback (FT)	0	0	0	C
19:66-5.12(a) 1. iv (10)	Minimum Rear Yard Setback (FT)	20	50.09	50.09	C

ENC – Pre-existing Non-conforming Condition

C – Conforms

V – Variance Required

**OFF-STREET PARKING & LOADING**

OFF-STREET PARKING REQUIREMENTS (PER TOWNSHIP OF ATLANTIC CITY ORDINANCES §163-70)	REQUIRED	EXISTING	PROPOSED	STATUS
Ground Floor: Commercial Retail (Deli) (One space for each 300 sf of floor area)	2,100 SF / 300 SF = 7 Spaces	0	0	ENC
Second Floor: Commercial Dispensary (One Space for Each 300 SF of Floor Area )	2,100 SF / 300 SF = 7 Spaces	0	2 Spaces	V
<b>TOTAL</b>	<b>14</b>	<b>0</b>	<b>2 Spaces</b>	

V – Variance Required

**Completeness Review / Submission Waivers Required**

1. The application requires the following waivers from the NJ CRDA Minor Site Plan Checklist (Form # 5):
  - a. Item number 6 – “Project narrative describing existing conditions, surrounding uses and the proposed development including a list of variances and design waiver relief sought, if any.”
  - b. Item number 21 – “Stormwater management plans and drainage calculations. (19:66-7.5).”
  - c. Item number 23 – “Grading plan depicting the direction of flow of surface run-off, spot elevations, contours within 1-foot intervals, stormwater management structures.”
  - d. Item number 24 – “Landscaping Plan, details and plant schedule (19:66-7.6).”
  - e. Item number 26 – “Soil Erosion and Sediment Control Plan. (Required for soil disturbance of 5,000 sq. ft. or greater) “
  - f. Item number 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.”
  - g. Item number 27 – “Road and paving cross-sections and profiles.”
  - h. Item number 31 – “Preliminary architectural plan and elevations, and areas and type of each proposed use.”
  - i. Item number 34 – “Performance guarantee [19:66-3.4 (b)]”
  - j. Item number 35 – “Maintenance guarantee (19:66-16.3)”
  - k. Item number 36 – “Inspection Fees (19:66-16.1)”
2. The application requires the following waivers from the NJ CRDA “c” Variance Checklist (Form #12):
  - a. Item number 7 – “Project narrative describing existing conditions, surrounding uses, and the proposed development including a list of variances and design waiver relief sought, if any.”
3. With the exception of the requirement to provide a Project Narrative, we do not have any objection to the granting of the other submission waivers sought / required, provided that the Applicant or their professionals give testimony to support the various waivers at the time of hearing.

**We recommend that the Application be deemed incomplete until the following items have been satisfactorily addressed:**

1. In order to justify the requested waivers for the submission of a a project narrative (Minor Site Plan Checklist Item #6 & ‘C’ Variance Checklist Item #7), the Applicant shall provide a written narrative of how the site will operate, including hours of operation, number of employees, ingress and egress arrangements to the building, a description of the proposed security and surveillance methods for the business, a description of the protocols for the delivery / unloading / loading of product and cash and all other pertinent information. A list of the variances and design waivers sought by the Applicant shall also be provided in the Project Narrative.
2. A signed / executed copy of the parking agreement between B&B Parking and the Applicant for the use of the two (2) spaces behind the subject building (Block 156, Lots 22 & 23) should be provided, to verify that the agreement is indeed in place.
3. If it is the intent of the Applicant to utilize the parking space in front of the building along the Atlantic Avenue frontage for loading / unloading purposes (as illustrated on the Site Plan as “Option #1), then consent from the City of Atlantic City is required to utilize the proposed loading space along the Atlantic Avenue frontage shall be provided as a condition of approval.
4. The Site Plan shall be revised to illustrate the route that will be utilized for loading / unloading purposes from the parking area on Lot 22 into the facility (as illustrated on the Site Plan as “Option #2), if this is indeed the option that the Applicant is proposing for loading / unloading activities.

5. The Zoning Table on the Cover Sheet of the Site Plan (Sheet C-01) indicates that fourteen (14) off-street parking spaces are being provided, however the information submitted indicates that only two (2) off-street parking spaces, those being the ones leased from B&B Parking, are being proposed. The Zoning Table should be amended to reflect the proposal and the appropriate variance relief will be necessary to permit two (2) off-street parking spaces where a total of fourteen (14) are required by ordinance for the combined two (2) uses.

We reserve the right to make further comments as revised submittals are received. Please contact the undersigned if you require any additional information or have any questions.

Sincerely yours,



G. Jeffrey Hanson, PE, CME  
CRDA Land Use Board Engineering Consultant



David J. Benedetti, AICP, PP  
CRDA Land Use Board Planning Consultant

Cc: ACC - Atlantic City Cannabis, LLC, Email [blackwaterpearlprojects@yahoo.com](mailto:blackwaterpearlprojects@yahoo.com)  
Center City Deli, Inc., Email: [louay930@comcast.net](mailto:louay930@comcast.net)  
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