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April 9, 2025
31623 61

Re: Atlantic City Cannabis, LLC (CRDA Application #2024-07-3662)
Minor Site Plan with Bulk Variances
Completeness Review #4
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 February 17, 2025, 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 Agreement 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. and Atlantic City Cannabis, LLC, to lease seven (7) parking spaces for a term commencing April 2, 2025, at 18 S. Martin Luther King Boulevard, Block 156, Lot 23, signed by Tim Boland.
14. Intent to comply with Ordinance #57 signed by Melissa Jackson Shade, dated April 30, 2024.
15. Letter from Nael Zumot to CRDA, dated December 3, 2024.
16. Project Narrative, undated.

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 seven (7) parking spaces in an unstriped parking lot behind the building on Block 156 Lot 23 (18 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 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 for collection. A proposed trash enclosure is illustrated on the Site Plans at the rear of the building, with a note that states “Relocate Trash Area” but it is unclear from the submittal to where it is proposed to be relocated.

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 on the information provided by the Applicant. No information has been provided concerning any 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	7 Spaces	C
TOTAL	14	0	7 Spaces	

C – Conforms, ENC – Existing Nonconforming Condition, 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 28 – “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. To justify the requested waivers for the submission of a project narrative (Minor Site Plan Checklist Item #6 & ‘C’ Variance Checklist Item #7), it is noted that the bulk variance relief required is contained on a table on the Site Plan. We have no objection to the waiver being granted on the condition that the Applicant shall provide supplemental information and / or testimony at the land use hearing 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.
4. 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 the hearing.
5. The applicant has provided a signed / executed copy of the parking agreement between B&B Parking and the Applicant for the use of seven (7) unidentified spaces behind the subject building (Block 156, Lot 23). These spaces should be identified. The agreement appears to run month to month and if the applicant is unable or unwilling to continue to lease these spaces an amended application to the NJ CRDA LURED will be required.
6. The Site Plan was revised to illustrate the route that will be utilized for loading / unloading purposes from the parking area on Lot 22 and Lot 23 into the facility for loading / unloading activities. However only a parking agreement was provided and not an access easement. An access easement will be required as a condition of any approval granted.
7. The Zoning Table on the Cover Sheet of the Site Plan (Sheet C-01) indicates that fourteen (14) off-street parking spaces are required and that only two (2) off-street parking spaces are proposed. This appears to be an oversight as it has been indicated in multiple places that seven (7) parking spaces are to be leased from B&B Parking. The Zoning Table should be amended to reflect the current proposal.
8. An up to date Certificate of Land Use Compliance (CLUC) for 18 South Martin Luther King Drive is required to permit the use of the seven (7) proposed parking spaces that the Applicant is proposing to lease to address

the off-street parking requirement for the project. Procurement of the CLUC shall be a condition of any approval granted under this application.

9. Clarification shall be provided regarding whether trash and recycling storage is proposed on any portion of the exterior of the building or whether it will all be stored indoors before collection and the Site Plan shall be revised to reflect same.
10. The Applicant shall provide information indicating how compliance with current Americans with Disabilities Act (ADA) regulations with respect to parking and access to the second floor retail facility.

We have no objection to the application being deemed complete on the condition that the Applicant satisfactorily addresses the comment above via testimony and / or supplemental information. Our office will provide a separate technical review letter to address all such items in advance of the land use hearing.

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

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Joshua M. Lurie, Esquire, Email: jmlurie@luriestrupinsky.com
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Rob Reid, AICP, PP, CRDA Land Use Regulation Enforcement Officer
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Tetje Linsk, CRDA Administrative Assistant