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November 12, 2025
31623 72

Re: Daniel Fast II, LLC (CRDA Application #2025-09-3902)
Preliminary & Final Major Subdivision
Preliminary & Final Major Site Plan with Bulk Variances and Use Variance
Technical Review #1
19 South Vermont Avenue
Block 126, Lots 55-58
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:

An Application for a Preliminary & Final Major Subdivision, Preliminary & Final Major Site Plan, Bulk Variance & Use Variance Approval has been received for the subject premises:

Applicant Information

- Applicant /:
Owner Daniel Fast II LLC c/o Keith Groff
56 Sleepy Hollow Drive
Tabernacle, NJ 08088
- Attorney: Brian Callaghan, Esquire
101 N. Washington Ave, Suite 14
Margate NJ, 08402
- Architect: Andrew Bectold
Thomas / Bechtold Architecture & Engineering
599 Shore Point Road
Somers Point, NJ 08244
- Engineer: MPMB Developers LLC
70 Arthur Drive
Rutherford, NJ 07087

- Surveyor: Anthony F. DiRosa
Tristate Engineering & Surveying, PC
PO Box 1304
Blackwood, NJ 08012

Documents Submitted

1. Cover letter, dated October 5, 2025, prepared by J. Brian Callaghan, Esquire, Applicant's Attorney.
2. CRDA City of Atlantic City Land Use Application, dated October 5, 2025, prepared by Applicant's Attorney.
3. "Narrative, Daniel Fast II, LLC, Lighthouse Row II", undated, prepared by Applicant's Attorney.
4. NJ CRDA City of Atlantic City Major Final Site Plan Checklist (Form #7), dated October 5, 2025, prepared by Applicant's Attorney.
5. NJ CRDA City of Atlantic City Final Major Subdivision Application Checklist (Form #10), dated October 5, 2025, prepared by Applicant's Attorney.
6. NJ CRDA City of Atlantic City "d" Variance Checklist (Form #11), dated October 5, 2025, prepared by Applicant's Attorney.
7. NJ CRDA City of Atlantic City "c" Variance Checklist (Form #12), dated October 5, 2025, prepared by Applicant's Attorney.
8. Plans titled "Major Subdivision & Site Plan, Lighthouse Row Phase II", dated September 26, 2025, prepared by MPMB Developers LLC, and consisting of the following sheets:
 - a. Sheet T1, Title Sheet
 - b. Sheet T2, Existing Site Condition
 - c. Sheet T3, Proposed Subdivision / Erosion & Sediment Control Plan
 - d. Sheet T4, Site, Grading & Landscaping Plan
 - e. Sheet T5, Utility Plan
 - f. Sheet T5, Utility Plan – Option B (Manifold Method)
9. "Topographic Survey", 1 Sheet, dated September 2, 2025, prepared by Tristate Engineering and Surveying, PC.
10. "Final Plan of Lots", 1 Sheet, dated September 2, 2025, prepared by Tristate Engineering and Surveying, PC.
11. Architectural Plans titled "Lighthouse Row", dated July 31, 2025, prepared by Thomas / Bechtold Architecture & Engineering, and consisting of the following sheets:
 - a. Sheet EX-1, Elevations
 - b. Sheet EX-2, Plans
12. Copy of Certified List of Property Owners within 200'.
13. Property Deed and Legal Description for Block 126 Lot 55 dated November 25, 2024.
14. Property Deed and Legal Description for Block 126 Lot 56 dated June 9, 2025.
15. Property Deed and Legal Description for Block 126, Lots 57 & 58, dated November 25, 2024.
16. City of Atlantic City Tax Collector, Property Taxes Paid through October 30, 2025, for Block 126 Lots 55, 56, 57, 58.
17. Various Site Photographs and Aerial Photographs.

Completeness Review / Submission Waivers Required

1. The Application requires submission waivers from the following items on the "NJ CRDA – City of Atlantic City – Major Final Site Plan Checklist" (Form #7):
 - i. 21 Stormwater Management Plans and Drainage Calculations

- ii. 25 Lighting plan, and details. (19:66-7.10).
- iii. 32 Estimate of costs of on-site and off-site improvements (19:66-3.4 (b)).
- iv. 34 Performance guarantee (19:66-3.4 (b)).
- v. 35 Maintenance guarantee (19:66-16.3).
- vi. 36 Inspection Fees (19:66-16.1).

We have no objection to the submission waivers requested by the Applicant being granted, with the exception of Item Nos. 32, 34, 35 & 36, which shall be granted for completeness only and shall be submitted prior to the issuance of a Certificate of Land Use Compliance. Appropriate supplemental information and / or testimony shall be provided at the land use hearing to justify the submission waivers for Item Nos. 21 and 25.

- 2. The Application requires submission waivers from the following items on the “NJ CRDA – City of Atlantic City –Final Major Subdivision Application Checklist” (Form #10):
 - i. 21 Stormwater Management Plans and Drainage Calculations
 - ii. 25 Lighting plan, and details. (19:66-7.10).
 - iii. 32 Estimate of costs of on-site and off-site improvements (19:66-3.4 (b)).
 - iv. 34 Performance guarantee (19:66-3.4 (b)).
 - v. 35 Maintenance guarantee (19:66-16.3).
 - vi. 36 Inspection Fees (19:66-16.1).

We have no objection to the submission waivers requested by the Applicant being granted, with the exception of Item Nos. 32, 34, 35 & 36, which shall be granted for completeness only and shall be submitted prior to the issuance of a Certificate of Land Use Compliance. Appropriate supplemental information and / or testimony shall be provided at the land use hearing to justify the submission waivers for Item Nos. 21 and 25.

- 3. We generally have no objection to the application being deemed complete on the condition that the various review comments contained in this letter and any other comments encountered during the course of the land use hearing being addressed via supplemental information and / or testimony being provided by the Applicant or his professionals.

Technical Review #1

The following comments are offered:

A. Project Description and Background

An application for Preliminary & Final Major Site Plan, Preliminary & Final Major Subdivision, “d” Variance and “c” Variance Approvals has been submitted by Daniel Fast II LLC to permit the construction of seven (7) townhomes on Vermont Place on vacant land. Four (4) individual structures are being proposed (two “twin” units, one “single” unit). Proposed improvements include the demolition and removal of existing chain link fencing and concrete walkways, construction of the new residential structures, construction of new sanitary sewer and water infrastructure within the Vermont Terrace right-of-way, including lateral connections for each of the new units, construction of new concrete curb, sidewalk and driveway apron at the intersection of S. Vermont Avenue & Vermont Terrace and along the S. Vermont Avenue frontage of the property, construction of a new bituminous access road in the Vermont Terrace right-of-way, landscaping improvements, and associated improvements. Trash and recycling storage areas are proposed within the inside of the garage area of each dwelling unit.

The minor subdivision proposes to adjust and reconfigure the existing four (4) lots associated with the overall parcel to create seven (7) new lots, with one dwelling unit being located on each lot.

The site is located within the Lighthouse One (LH-1) Zoning District. The proposed seven (7) unit attached / detached single-family development is not specifically permitted within the LH-1 Zone, therefore use variance approval is required. Bulk variances for lot area, lot depth, lot width, lot frontage, and rear yard setback are also required for each proposed lot. Design waivers are required for providing full curb and gutter and public sidewalk for Vermont Terrace, for the installation of a blow-off flushing hydrant and for providing a dedicated area for the storage of trash and recyclables.

The existing overall parcel comprises four (4) tax map lots and approximately 13,500 SF (0.310 Acres). The property is bound by residential uses on the north and east sides, by open space on the south side and by a vacant property on the west side across S. Vermont Avenue.

B. Zoning Review / Design Waivers

- The following is a summary of the existing and proposed conditions for each proposed lot with respect to the bulk requirements for the LH-1 Zone:

DIMENSION	REGULATION	REQUIRED	EXISTING	PRO-POSED 55.01	PRO-POSED 55.02	PRO-POSED 55.03	PRO-POSED 55.04	PRO-POSED 55.05	PRO-POSED 55.06	PRO-POSED 55.07	STATUS FOR ALL LOTS
Height, Max. Principal (Feet)	19:66-5.18(a)(1)iv(1)	300	N/A	34.75	34.75	34.75	34.75	34.75	34.75	34.75	C
Height, Max. Accessory (Feet)	19:66-5.18(a)(1)iv(1)	35	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Lot Area (Sq Ft)	19:66-5.18(a)(1)iv(2)	7,500	13,547.16	2,317.5	1,867.5	1,867.5	1,867.5	1,867.5	1,867.5	1,867.5	V
Lot Depth (Feet)	19:66-5.18(a)(1)iv(3)	150	113	90	90	90	90	90	90	90	V
Lot Width (Feet)	19:66-5.18(a)(1)iv(4)	50	50	25.75	20.75	20.75	20.75	20.75	20.75	20.75	V
Lot Frontage (Feet)	19:66-5.18(a)(1)iv(5)	50	50	25.75	20.75	20.75	20.75	20.75	20.75	20.75	V
Building Cover, Max. (%)	19:66-5.18(a)(1)iv(6)	70	N/A	44	55	55	55	55	55	55	C
Impervious Cover, Max. (%)	19:66-5.18(a)(1)iv(7)	80	N/A	62	74	74	74	74	74	74	C
Front Yard, Min. (Feet)	19:66-5.18(a)(1)iv(8) Up to 35 feet in height Over 35 feet in height	0 20	N/A	27	27	27	27	27	27	27	C
Side Yard, Min. (Feet)	19:66-5.18(a)(1)iv(9) Up to 35 feet in height Over 35 feet in height	0 20	N/A	3.75/0	3.75/0	0/3.75	3.75/0	0/3.75	3.75/0	0/1.5	C
Rear Yard, Min. (Feet)	19:66-5.18(a)(1)iv(10)	20	N/A	3	3	3	3	3	3	3	V
Dwellings / Acre, Max.	19:66-5.18(a)(1)iv(13)	25	18.796	23.325	23.325	23.325	23.325	23.325	23.325	23.325	C

C – Conforming**ENC – Existing Nonconforming Conditions****V – Variance Required**

2. Neither attached nor detached single-family buildings / developments are specifically permitted within the LH-1 Zone, therefore use variance approval is required.
3. The Applicant has the burden of proof to present “positive” and “negative” criteria to justify the d(1) variance a use or principal structure in a district restricted against such use or principal structure. The Applicant should provide testimony indicating that:
 - a. There are “special reasons” to grant the requested relief (e.g., is it “inherently beneficial”).
 - b. The site is particularly suited to the proposed use, OR would be zoned into inutility without the variance.
 - c. The proposed will advance the purposes of the NJ Municipal Land Use Law (NJSA 40:55D-2) and the Township’s Master Plan and Zoning Ordinance.
 - d. The variance can be granted without substantial detriment to the public good, and the variance will not substantially impair the intent and purpose of the zone plan and zoning ordinance.
3. Section 19:66-5.18(a)(1)(iv)(2) of the Land Development Rules requires a minimum lot area of 7,500 SF whereas 2,317.50 SF is proposed for Lot 55.01 and 1,867.5 SF is proposed for Lots 55.02, 55.03, 55.04, 55.05, 55.06 and 55.07. Variances are required.
4. Section 19:66-5.18(a)(1)(iv)(3) of the Land Development Rules requires a minimum lot depth of 150 feet whereas 90 feet is proposed for Lots 55.01, 55.02, 55.03, 55.04, 55.05, 55.06 and 55.07. Variances are required.
5. Section 19:66-5.18(a)(1)(iv)(4) of the Land Development Rules requires a minimum lot width of 50 feet whereas 25.75 feet is proposed for Lot 55.01 and 20.75 feet is proposed for Lots 55.02, 55.03, 55.04, 55.05, 55.06 and 55.07. Variances are required.
6. Section 19:66-5.18(a)(1)(iv)(5) of the Land Development Rules requires a minimum lot frontage of 50 feet whereas 25.75 feet is proposed for Lot 55.01 and 20.75 feet is proposed for Lots 55.02, 55.03, 55.04, 55.05, 55.06 and 55.07. Variances are required.
7. Section 19:66-5.18(a)(1)(iv)(10) of the Land Development Rules requires a minimum rear yard setback of 20 feet whereas 3.0 feet is proposed for Lots 55.01, 55.02, 55.03, 55.04, 55.05, 55.06 and 55.07. Variances are required.
8. With respect to items No. 3 through 7, for "c" variances, the applicant must demonstrate that the strict application of the zoning regulations to the property creates a hardship or results in exceptional practical difficulties by reason of the exceptional shape of the property or the exceptional topographic conditions uniquely affecting the property.
9. The Applicant or his professionals shall provide supplemental information / testimony to justify the various design waivers sought / required. We defer to ACMUA as to whether the proposed blow-off flushing hydrant will be acceptable.
10. The Applicant proposes three (3) off-street parking spaces per unit, therefore the RSIS requirements for off-street parking are satisfied.

C. Subdivision Plan Comments

1. *Appropriate corner markers, such as stakes, iron pipes, cut crosses, monuments and such other markers as may be authorized under (d)2 below, shall be set either by the licensed professional land surveyor or under the supervision of the licensed professional land surveyor. Such markers shall be set at each property corner not previously marked by a property marker, **The Plan of Survey does not comply with the administrative code regarding monumentation.***
2. *Street and street names and location and widths of the traveling way, when such streets abut or adjoin the property in question. If the street is not open, the survey should so indicate; **The paved area of each street and the width of the traveling way shall be shown on the plan for each street.***
3. *The map shall clearly show all monumentation required by this chapter, including monuments found, monuments set, and monuments to be set. The outbound corner markers shall be set pursuant to regulations promulgated by the State Board of Professional Engineers and Land Surveyors. **The outbound corner markers shall be set.***
4. *The county recording officer shall not accept for filing any map, with the exception of a right-of-way parcel map, unless it has endorsed on it a certificate by the municipal clerk or secretary of the planning board stating:
 - a. That the proper authority has approved the map or stating its exemption from approval;
 - b. That the map complies with the provisions of this law; and
 - c. The date by which the map is required to be filed by the applicable law.**The proper endorsement shall be added to the plan.***
5. Lot closure reports for each lot shall be provided for our review.
6. Legal descriptions shall be provided for each proposed lot for review by our office and by CRDA's legal counsel.
7. The Applicant shall submit any proposed easements to this office and CRDA for review before filing with the Atlantic County Clerk.
8. A legend shall be added to the plan.

D. Site Plan Comments

1. Supplemental information and / or testimony shall be provided by the Applicant's engineer that the proposed development meets the requirements of NJAC 7:8, which regulates stormwater management requirements for major development.
2. Calculations shall be provided by the Applicant's Engineer to demonstrate that the landscaped / porous areas designated on Sheet T4 of the plans have sufficient volume to store and infiltrate the water quality design storm.

3. A BMP Manual, consistent with the regulations of NJAC 7:8, shall be provided for the proposed infiltration measures. The BMP Manual shall designate an individual as being responsible for the maintenance of the infiltration measures and shall be incorporated as deed restrictions to each lot.
4. The proposed extents / locations of the 6' white vinyl privacy fence, 6' black double picket aluminum fence and any gates shall be illustrated more clearly on the site plan. Appropriate details for the fences and gates shall be added to the site plans.
5. The pavement cross section for Vermont Terrace shall be modified to increase the thickness of the HMA12.5M64 base course to 3".
6. The Applicant shall confirm that the ultimate paved width of Vermont Terrace will be 18' and the plan shall be revised to clearly delineate the proposed cartway width.
7. A construction detail for the proposed driveways for the individual units shall be added to the site plans. Clarification shall be provided on whether the driveways will be constructed of concrete or bituminous material.
8. Appropriate construction details shall be provided for the proposed driveway apron, depressed curb and sidewalk at the intersection of Vermont Terrace & S. Vermont Avenue.
9. A stop sign and stop bar striping shall be provided for the egress of Vermont Terrace onto S. Vermont Avenue. Locations and details for same shall be added to the site plan.
10. The existing vinyl fence that has been constructed within the Vermont Terrace right-of-way along the westerly boundary of Phase 1 of the Lighthouse Row development shall be removed and the right-of-way shall be maintained free of obstructions. The proposed vinyl fence along the easterly boundary of Phase 2 of the development shall not extend across any part of the Vermont Terrace right-of-way.
11. The Utility Plan shall be submitted to Atlantic City Municipal Utilities Authority for review and comment with respect to the proposed sanitary sewer and water improvements. All review comments provided by ACMUA shall be addressed via appropriate plan revisions.
12. The Applicant proposes 8-foot driveway easements for each lot in addition to the existing 10-foot-wide Vermont Terrace for a cartway width of 18 feet for access to the seven new dwellings and one existing dwelling on Vermont Terrace. The Applicant should provide a title report to identify if Vermont Terrace is a public right-of-way or an easement.
13. A copy of the agreement requiring maintenance of Vermont Terrace by the owners of the individual dwelling units shall be provided and reviewed by this office and CRDA legal counsel. The final agreement shall be recorded as a deed restriction for each property.
14. The Site Plan incorrectly identifies two lots as Block 126 Lot 58; one is a vacant lot on Vermont Terrace, and the other is 109 Vermont Terrace, which has an official designation of Block 126 Lot 59. This should be corrected on any subsequent plan submission.

15. Trash and recycling are proposed to be stored within the basement garage area. The Applicant should provide testimony on the nature of trash collection (curbside or container) and if pick-up will be by a private hauler or if the property will rely upon public collection.
16. The site and architectural plans shall be submitted to the Atlantic City Fire Marshal for review and approval. It is noted that the proposed roadway, Vermont Terrace, is an 18-foot cartway, and the applicant should consult with the Atlantic City Fire Department to establish how the fire apparatus will maneuver and stage in this area in the event of an emergency. Any comments raised during the course of the Fire Marshal's review shall be incorporated through future plan revision(s).
17. Proposed block and lot numbers shall be verified / approved by the City of Atlantic City Tax Assessor's office.
18. Proposed street address numbers shall be verified / approved by the City of Atlantic City 911 Coordinator's office.
19. The Applicant is solely responsible for any utility connection fees associated with the dwellings that are proposed with the subdivision.
20. The Applicant should provide testimony regarding the proposed lighting levels of all of the exterior areas of the development. Proposed lighting levels shall be illustrated on the site plans.
21. The Applicant shall obtain road opening permits, as necessary, for the construction of utility connections and all other work within the City's rights-of-way.
22. The Applicant shall be required to post a performance bond and inspection escrow for all proposed site improvements that are subject to this requirement, including those within the City right-of-way prior to the issuance of Certificate of Land Use Compliance. Should the Applicant gain land use approval our office will provide a bond / inspection escrow estimate in conjunction with our conformance review for such purposes.

E. Outside Agency Permits and Approvals

1. The following permits and approvals are required:
 - a. City of Atlantic City CLUC
 - b. Atlantic City Building Code Official
 - c. Atlantic City Construction Department
 - d. Atlantic City Municipal Utilities Authority
 - e. Atlantic County Soil Conservation District
 - f. Atlantic City Fire Marshal
 - g. All others as necessary

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

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: Daniel Fast II, LLC, c/o Keith Groff, Applicant keg7777@yahoo.com
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Scott Collins, Esquire, CRDA Land Use Board Attorney
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