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June 11, 2024

Sharon D. Dickerson, Esq.  
General Counsel  
Casino Reinvestment Development Authority  
15 S. Pennsylvania Avenue  
Atlantic City, New Jersey 08401

**RE: Tourism District Master Plan Consistency Review**

Dear Ms. Dickerson:

The purpose of this letter is to determine whether the proposed Atlantic City Atlantic Avenue Road Diet Project ("Road Diet Project") is consistent with the land use planning goals and purposes of the Atlantic City Tourism District ("Tourism District") Master Plan as well as sound transportation and traffic engineering design standards. All plans and documentation submitted to the Casino Reinvestment Development Authority ("CRDA") have been reviewed in order to prepare this analysis.

The Tourism District is the geographical area within the confines of Atlantic City which was established by the CRDA by its Resolution 11-25 adopted April 19, 2011 pursuant to the authorization granted by P.L. 2011, c. 18. This legislation gave oversight of the area within the Tourism District to the CRDA, including the control and direction of traffic within the Tourism District. Atlantic Avenue falls entirely within the Tourism District.

### **OVERVIEW OF THE PROJECT**

The proposed Road Diet Project would reduce the traffic lanes in Atlantic Avenue from four lanes, two in each direction, to two lanes, one lane in each direction with a center turning lane and two bicycle lanes. It also includes other improvements to lighting, landscaping and traffic signalization.

The Project need is described in the documentation as follows:

The existing roadway conditions and infrastructure along Atlantic Avenue do not properly facilitate safe traffic conditions. Between 2013 and 2017, 829 total crashes

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were documented on Atlantic Avenue within the limits of Atlantic City. The corridor includes a mix of land uses and has various retail establishments that draw pedestrian activity. This project includes a targeted approach aimed at mitigating the existing crash patterns that are prevalent in the area. The purpose of the plan is to move away from today's automobile-dominated roadway configuration and make Atlantic Avenue more multi-modal and accessible for all road users. At the intersection of Atlantic Avenue & Ohio Avenue, two pedestrian crashes occurred at the northwest corner, near the location of the bus station entrance recently. Another involved a pedestrian crossing against the signal against the east leg, and the final occurred while the pedestrian was exiting a bus. Two crashes, both of which occurred at the entrance of the south leg, involved a vehicle waiting for pedestrians to exit the crosswalk that was rear-ended by a vehicle behind it. Vehicle to vehicle crash trends include eight same direction crashes on eastbound approach, three on westbound lanes of the west leg. Five of the Atlantic Avenue area's 17 crashes occurred at the Ohio Avenue intersection.

The proposed Project improvements are described in the documentation as follows:

The purpose of this project is to provide safety countermeasures to reduce the frequency of collisions, provide pedestrian accessibility improvements, as well as improve traffic flow. The project includes a roughly 1.6 mile segment of Atlantic Avenue from Tennessee Avenue to Boston Avenue. The existing roadway cross section will be reduced from two travel lanes in each direction to one lane in each direction along most of the corridor. The typical curb to curb width of 70 feet will remain unchanged. The revised typical cross-section will include on-street parking, bike lanes, one vehicular travel lane in each direction and a center pavement striped at key intersections, will include auxiliary turn lanes as warranted. Traffic signal head alignment changes will be made to match the new cross-sections and the timing and phasing along the corridor will be optimized and synchronized for the proposed conditions. Traffic signal controllers will be upgraded to allow fiber-based communications. Fiber filled conduits will be installed for signal synchronization, traffic management and security cameras. LED pedestrian safety lighting will be included in the improvements. The project will include a revised signing and striping plan with new marked crosswalks at all signalized crossing locations. Fiber optic cable will be connected to all signals and the fiber optic cable will be made to access both City Hall and Public safety building.

At the intersection of Atlantic Avenue & Ohio Avenue, added recommendations for this intersection include:

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- Install audible signals, pedestrian buttons, and countdown pedestrian heads
- Signal upgrade to have 12-inch signal heads with backplates with retroreflective borders
- Paint bus loading zone at stops that will fully accommodate the length and width of the bus
- Install uniform, high-visible crosswalks
- Add signage to indicate lane shift ahead, remove old signage, etc.

### **OVERVIEW OF S-11**

As part of S-11, the New Jersey Legislature created the Tourism District to be administered and managed by the CRDA. The CRDA is authorized to promote private investment in the development of the Atlantic City boardwalk, the city's Marina District, and the development within the Tourism District of family-oriented entertainment. To accomplish these objectives, the CRDA has been given the authority to create design guidelines and land-use regulations, and to create a master plan for the Tourism District, all of which supersede any existing zoning, land use ordinances, and the Atlantic City Master Plan. The CRDA is also authorized to act in a manner similar to a municipal planning or zoning board, having the power to review and decide on applications for development projects. In addition, relevant to the proposed Road Diet Project, S-11 grants the CRDA jurisdiction over the control and direction of traffic within the Tourism District.

### **OVERVIEW OF THE TOURISM DISTRICT MASTER PLAN**

Ultimately, capitalizing on Atlantic City's reputation as a gaming center, along with the growing family and varied entertainment and recreational opportunities, the CRDA is responsible for the ongoing economic development of the Tourism District.

The intent of the Tourism District is not merely just to improve the designated area under the jurisdiction of the CRDA as stated within S-11; as established by the legislation, a major objective is for the ultimate realization of redevelopment to trickle outside of the district and into portions of the City. To facilitate this objective, the enabling legislation contains numerous provisions for loan and financing for redevelopment projects within the Tourism District, so it is clear that the New Jersey Legislature realizes that private capital



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alone may not be sufficient enough, especially in these challenging economic times, to spark redevelopment.

The February 2012 Tourism District Master Plan adopted by the CRDA offers a strategic framework for “near-term, mid-term and long-term project and policy initiatives that will enhance the visitor experience, stimulate private investment and improve the financial stability of Atlantic City.”

Notably, the Tourism District Master Plan provides the following overarching vision:

The Master Plan seeks to reinvigorate the Atlantic City experience by enhancing the Boardwalk, beach and nearby streets through extensive entertainment and event programming; creating an improved street-level experience on major thoroughfares; offering new and dynamic retail offerings, and increasing cleanliness and safety. The plan offers strategies for the formation of inspired districts, contemporary entertainment and enthralling attractions that activate and energize the entire Tourism District. Atlantic City always has been, and will continue to be, the top choice for those seeking unique events, exciting food and beverage, vibrant retail and, above all, the intangible quality of spontaneity and excitement.

The April 2017 Master Plan update was adopted in recognition of the changes in the area since the adoption of the 2012 Master Plan. Its overarching goal is to “offer recommendations that will help the area pivot and reposition itself as a destination for not only tourism purposes, but also to live, work, and play.”

The following are the specific applicable objectives of the April 2017 Master Plan update:

- To provide a zoning scheme that will catalyze appropriate, highly functional, exciting, and ratable-producing development in the Tourism District.
- To guide future residential and non-residential growth in a coordinated and managed approach and to provide for logical transitional uses between residential and non-residential areas of the Tourism District.
- To provide, further and promote tourist industries in New Jersey and especially Atlantic County, by providing financial assistance for the planning, acquisition, construction, improvement, maintenance and operation of facilities for the recreation and entertainment of the public.

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- To capitalize on the Tourism District's unique natural resources.
- Encourage innovative land uses and public-private partnerships to stimulate new markets and strengthen and diversify the Tourism District's economic base.
- To encourage location and design of transportation routes which promote the free flow of traffic while discouraging location of such locations and routes that will result in congestion or blight.

### **OVERVIEW OF THE TOURISM DISTRICT MASTER PLAN AS IT RELATES TO THE NEED FOR ROADWAY INFRASTRUCTURE IMPROVEMENTS**

The Near Term Overview of Atlantic Avenue, contained on Page 40 of the 2012 Master Plan, recognizes Atlantic Avenue as "the area's main artery."

Additionally, the Design Principles for Atlantic Avenue, contained on Page 122, references the establishment as Atlantic Avenue "as the City's main circulation artery, therefore, maximizing exposure for all tenants and businesses along the Avenue."

The proposed Road Diet Project runs counter to Atlantic Avenue's designation and function as an arterial road. Creating a vision for the City's "main artery" requires sufficient traffic flow to ensure the proper movement of vehicles.

The 2012 Master Plan at "2.5.3 Infrastructure Inventory Assessment" contained on Page 2-9 indicates the following:

With regard to roadway capacity and traffic congestion, the analyses included herein indicate that the Tourism District does not have sufficient roadway capacity to accommodate the anticipated increase in traffic volumes expected as the District approaches build-out. Constraints to roadway expansion include the presence of existing development and environmentally sensitive lands along waterfront areas. These constraints limit the extent to which right-of-way may be obtained and the locations where new infrastructure may be constructed.

Alternative modes of transportation are required to overcome these impediments and constraints. These modes may include the expansion of existing rail, bus, jitney and shuttle services and/or the introduction of new modes of transportation such as light rail, street car, trolley, water taxi and other services. The analysis conducted for



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CRDA which resulted in the May 2009, The Atlantic City Regional Transportation Plan, Volume II Implementation Program, by DMJM Harris/AECOM, provides a series of projects over a near and long term basis to manage demands on the transportation system.

Additionally, a standalone Infrastructure Inventory Assessment contained at "Exhibit 2-6 BSG Infrastructure Inventory Assessment" of the 2012 Master Plan, found on Page 34 of that exhibit, states: "The existing volume of vehicles and travel patterns has created conditions where significant traffic delays occur during peak morning and evening hours, during special events and during the peak lunch hour at many of the intersections within the District."

As noted, the Master Plan recognizes the need for additional roadway capacity, not a "Road Diet" along the City's "main artery." The proposed reduction in the number of lanes along Atlantic Avenue will likely serve to exacerbate the roadway constraints and traffic issues identified in the Master Plan.

The Infrastructure Inventory Assessment also identifies the existing bicycle route along the Boardwalk and states the need to investigate connections to other portions of the Tourism District and City. The assessment specifically identifies proposed bicycle routes along Albany Avenue, Brigantine Boulevard, Huron Avenue and Absecon Boulevard, but not along Atlantic Avenue.

While the Master Plan calls for streetscape, sidewalk and lighting improvements along Atlantic Avenue, these improvements can be accomplished without a "road diet." There are creative alternative ways to facilitate traffic control, improve the free flow of traffic, and enhance pedestrian crossing safety without eliminating lanes, such as changing pavement textures in specific areas, curb bump/bulb-outs or curb extensions, on-street parking buffered by landscaping, or slight speed reducing mechanisms.

Reducing the number of lanes is anathema to ongoing economic development throughout the Tourism District, which is the overarching intent of the Master Plan iterations. A reduction in traffic flow along Atlantic Avenue is contrary to the goals and objectives of the Master Plan due to identified insufficient road capacity and the potential that the Road Diet will displace traffic throughout the connecting streets, causing havoc throughout the Tourism District, especially during peak times and events.

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### **OVERVIEW OF STATE DEVELOPMENT AND REDEVELOPMENT PLAN (SDRP)**

The Tourism District is within the New Jersey State Development and Redevelopment Plan (SDRP) "Planning Area 1," which represents mature urban areas with limited vacant land. Lands in Planning Area 1 are recognized for having the most need for rehabilitation and redevelopment in order to spur urban revitalization.

### **CONSISTENCY REVIEW BETWEEN THE PROPOSED PROJECT AND THE TOURISM DISTRICT MASTER PLAN AND SDRP**

Based on our review, reducing lanes on Atlantic Avenue will not advance the objectives of S-11, the Tourism District Master Plan, and the SDRP, which are primarily driven by economic development and redevelopment.

While streetscape, sidewalk and lighting improvements along Atlantic Avenue may be beneficial, these improvements can be accomplished without a "road diet." Further, there are creative alternative ways to facilitate traffic control and improve the flow without eliminating lanes.

On balance, it is my opinion that the proposed Road Diet Project is inconsistent with the Tourism District Master Plan.

Yours sincerely,

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