



CHRISTINE A. COFONE, PP, AICP
Principal

COFONE CONSULTING GROUP, LLC

March 7, 2018

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

RE: **Boardwalk 1000, LLC**
1000 Boardwalk at Virginia Avenue
Block 61, Lots 1-21, 30-32 (air rights), 33
Application #2018-02-2328

Dear Mr. Landgraf:

We have deemed this application **complete** for review.

In the subject application, the applicant is seeking preliminary and final site plan approval and variance approval for various signs for the approximately 29.64-acre Hard Rock Hotel & Casino Atlantic City, located at Block 61, Lots 1-21, 30-32 (air rights) and 33 within the Resort Commercial (RC) Zone. The extent of this Application is a comprehensive signage package related to the rebranding of the Site from the former Taj Mahal Casino & Hotel to Hard Rock Hotel & Casino Atlantic City as well as to provide necessary directional indicators to facilitate safe traffic flow around the Site to the various amenities. No additional site improvements are proposed.

As part of our analysis, we undertook the following tasks: an inspection of the subject premises; a survey of surrounding land uses; review of the Casino Reinvestment Development Authority Tourism District Land Development Rules and Tourism District Zoning Map; review of the Applicant's Application submission package; review of business signage plans for the Hard Rock Hotel & Casino, consisting of 18 sheets, prepared by Jones Sign; business signage plans for the Hard Rock Hotel & Casino, consisting of one sheet, prepared by SOSH Architects; informational and directional signage package for the Hard Rock Hotel & Casino, consisting of 41 sheets, prepared by Kiku Obata; site plan associated with the Kiku Obata signage plans, prepared by SOSH Architects and Arthur W. Ponzio Co. & Associates, Inc.; and business signage plans for the Rock Stop, consisting of five sheets, prepared by SOSH Architects; an application cover letter from Jack Plackter, Esq., dated February 21, 2018; and a CRDA application dated February 23, 2018.

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We offer the following analysis and comments for your consideration.

Description of Site and Summary of Development Proposal

The approximately 29.64-acre Site is developed with the former Taj Mahal Casino & Hotel. The Applicant will reopen the property as the Hard Rock Hotel & Casino Atlantic City.

The extent of this Application is a comprehensive signage package related to the rebranding of the Site from the former Taj Mahal Casino & Hotel to Hard Rock Hotel & Casino Atlantic City as well as to provide necessary directional indicators to facilitate safe traffic flow around the Site to the various amenities. No additional site improvements are proposed.

The signage package includes various types of signs for the casino and hotel, a new gas station and convenience store, known as the Rock Stop, and the parking garages, along with on-site directional signs. The signage package includes wall signs, ground signs, pole signs, canopy signs, projecting signs, directional signs, and informational signs.

Surrounding Land Uses

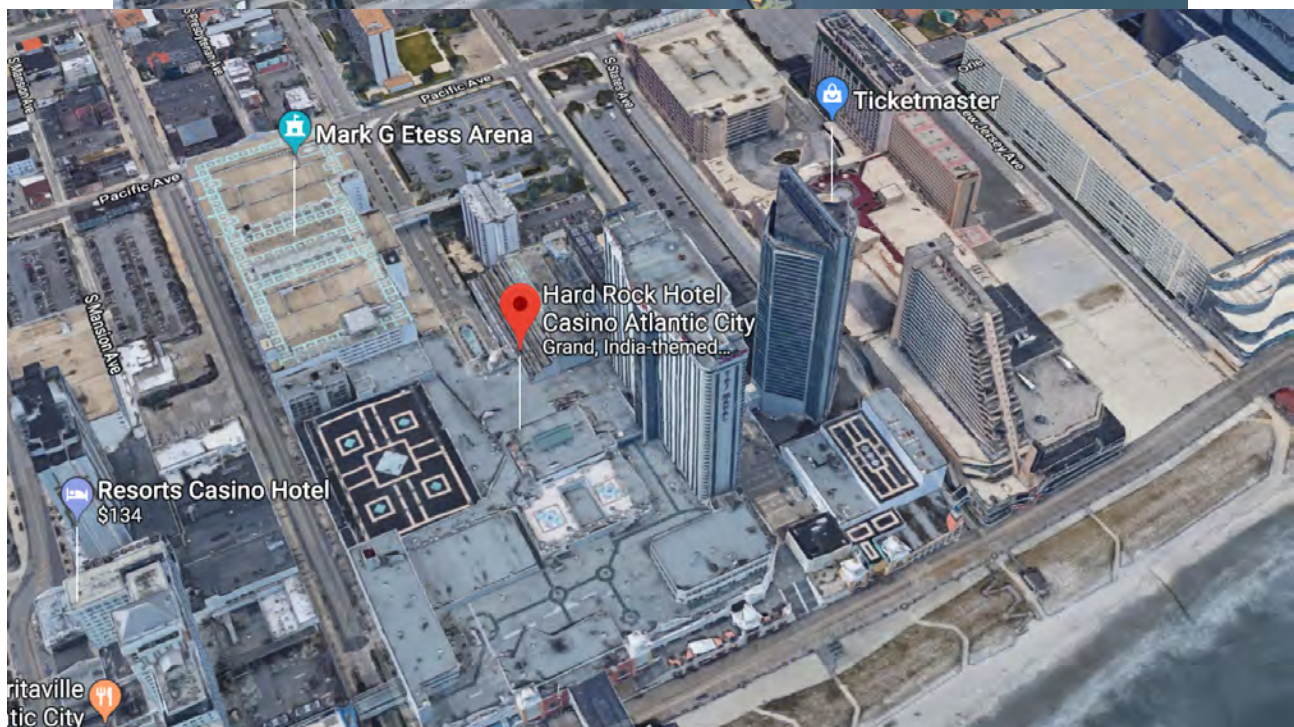
The Site is located in the northeastern section of the Tourism District and along the boardwalk in an area defined by resort commercial uses. It is bordered by Pennsylvania Avenue to the south, Pacific Avenue to the west, and Maryland Avenue to the north. Virginia Avenue bisects a portion of the Site at its eastern terminus.

It is within the northern extent of the boardwalk resort area, across from the Steel Pier and south of Ocean Resort Casino, formerly known as Revel and TEN.



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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:

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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.

Numerous variances are required for the overall signage package. The CRDA Land Development Rules regulate signs at Section 19:66-5.7, titled "Signs," and as specific to the RS-C District, at Section 19:66-5.7(j) titled "Sign rules for commercial and special purpose districts. Signs shall be permitted in the GWAY, RC, CBD, KAR, TWD, B, MARINA, GB, AI, and BADER zoning districts."

The following table depicts the CRDA Land Development Rules' Sign Requirements as applied to the proposed signage, pursuant to Section 19:66-5.7.

Site Signage SCHEDULE					
Reg. SECTION		PERMITTED OR REQUIRED	EXISTING CONDITIONS	PROPOSED IMPROVEMENTS	CONFORMITY STATUS (C: CONFORMS/DNC: DOES NOT CONFORM)
19:66-5.7(g)	SIGNS PERMITTED IN ALL ZONES				
19:66-5.7(g) 1; 19:66-5.7(e) 1. xix	Off-Site Directional Signs	Wayfinding Signs, Governmental Signs	NONE	Wayfinding Signs AA-01, AA-02, AA-09, DD-03 Governmental HH2-04, HH2-05, HH2-07, HH2-08	C
19:66-5.7(g)	On-Site Directional Signs	On-Site Information Signs, Governmental Signs	NONE	On-Site Information Signs AA-10, BB-40, CC1-37, CC2-28, EE1-15, EE1-19, EE1-20, EE1-21, FF-15.1, FF-15.2, FF-18.1, FF-18.2, FF-18.4, FF-18.6, GG-16, GG-18, GG-30, JJ1-06, JJ1-12, JJ1-14, JJ1-33, JJ1-35, JJ2-31, JJ3-26, JJ4-22 Governmental Signs LL-13, LL-25, LL-27, LL-34, LL-36	C
19:66-5.7 (g) 12	On-Site Information Structural types	Wall Signs, Window Signs, or Ground Signs	NONE	Wall Signs CC1-37, CC2-28, EE1-15, EE1-19, EE1-20, EE1-21, FF-15.1, FF-15.2, FF-18.1, FF-18.2, FF-18.4, FF-18.6, JJ1-06, JJ1-12, JJ1-14, JJ1-33, JJ1-35, JJ2-31, JJ3-26, JJ4-22 Ground Sign AA-10 Projecting Sign BB-40, Pole Signs GG-16, GG-18, GG-30	DNC – Projecting and Pole Signs

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19:66-5.7 (g) 12	On-Site Information Size	2 SF Max.	NONE	Wall Signs CC1-37 247 SF, CC2-28 117 SF, EE1-15 14.5 SF, EE1-19 14.5 SF, EE1-20 14.5 SF, EE1-21 14.5 SF, FF-15.1 10 SF, FF-15.2 10 SF, FF-18.1 10 SF, FF-18.2 10 SF, FF-18.4 10 SF, FF-18.6 10 SF, JJ1-06 72 SF, JJ1-12 72 SF, JJ1-14 72 SF, JJ1-33 72 SF, JJ1-35 72 SF, JJ2-31 72 SF, JJ3-26 72 SF, JJ4-22 162 SF Ground Sign AA-10 33 SF Projecting Sign BB-40 256 SF, Pole Signs GG-16 3 SF, GG-18 3 SF, GG-30 3 SF	DNC – Signs greater than 2 SF
19:66-5.7 (g) 12	On-Site Information Height	12' Max.	NONE	Wall Signs CC1-37 13.5 FT, CC2-28 13.5 FT, EE1-15 10.5 SF, EE1-19 10.5 SF, EE1-20 10.5 SF, EE1-21 10.5 SF, FF-15.1 9.5 FT, FF-15.2 9.5 FT, FF-18.1 9.5 FT, FF-18.2 9.5 FT, FF-18.4 9.5 FT, FF-18.6 9.5 FT, JJ1-06 16 FT, JJ1-12 16 FT, JJ1-14 16 FT, JJ1-33 16 FT, JJ1-35 16 FT, JJ2-31 17.5 FT, JJ3-26 17.5 FT, JJ4-22 16.5 FT Ground Sign AA-10 9 FT Projecting Sign BB-40 56 FT, Pole Signs GG-16 8.8 FT, GG-18 8.8 FT, GG-30 8.8 FT	DNC – Signs higher than 12 FT
19:66-5.7 (j)	SIGN REGULATIONS FOR RC ZONE				
19:66-5.7 (j) 2. i	Sign Structural Types	All structural types except for roof signs	NONE	Wall Signs #1, #2, #4, #6, #7, #9, #10, #11, #12, #15, #16, #17, #18, #19, #20, #21, #22, #23, #24, #25, #26, MM-17, NN-18.3, NN-18.5 Pole Signs #3 Ground Signs #5a, #5b Roof Signs #1, #15	DNC – Roof Signs
19:66-5.7 (j) 2. ii	Sign Structural Types	Electronic billboards except within Beach District	NONE	NONE	NA
19:66-5.7 (j)3. i	NUMBER OF SIGNS (Pacific Ave)	2 WALL MOUNTED SIGNS and either 1 GROUND SIGN, OR 1 POLE SIGN per street frontage (2 WALL MOUNTED SIGNS and 1 GROUND OR 1 POLE SIGN)	NONE	Wall Signs #1, #2, #6, Ground Signs #5a, #5b	DNC – ONLY 2 WALL SIGNS and 1 GROUND SIGN PERMITTED
19:66-5.7 (j)3. i	NUMBER OF SIGNS (Virginia Ave)	2 WALL MOUNTED SIGNS and either 1 GROUND SIGN, OR 1 POLE SIGN per street frontage (2 WALL MOUNTED SIGNS and 1 GROUND OR 1 POLE SIGN)	NONE	Wall Signs #4, MM-17, NN-18.3, NN-18.5, Pole Sign #3	DNC – ONLY 2 WALL SIGNS and 1 POLE SIGN PERMITTED

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19:66-5.7 (j)3. i	NUMBER OF SIGNS (Pennsylvania Ave)	2 WALL MOUNTED SIGNS and either 1 GROUND SIGN, OR 1 POLE SIGN per street frontage (2 WALL MOUNTED SIGNS and 1 GROUND OR 1 POLE SIGN)	NONE	Wall Signs #7, #15	C
19:66-5.7 (j)3. i	NUMBER OF SIGNS (Boardwalk)	2 WALL MOUNTED SIGNS and either 1 GROUND SIGN, OR 1 POLE SIGN per street frontage (2 WALL MOUNTED SIGNS and 1 GROUND OR 1 POLE SIGN)	NONE	Wall Signs #9, #10, #11, #12, #16, #17, #18, #19, #20, #21, #22, #23, #24, #25, #26	DNC- ONLY 2 WALL SIGNS PERMITTED
19:66-5.7 (j)3. ii	AWNING , CANOPY OR MARQUEE SIGN	1	NONE	NONE	NA
19:66-5.7 (j)3. iii	PROJECTING SIGN	1	NONE	NONE	NA
19:66-5.7 (j)3. iv	WINDOW SIGN	1 per accessory use	NONE	NONE	NA
19:66-5.7 (j)3. v	Electric Billboard Sign	1	NONE	NONE	NA
19:66-5.7 (j)4. i	Max. Surface Area of Signs	25% of the total wall surface area per elevation	NONE	Wall Signs #1 5.76%, #2 1.90%, #9 .20%, #10 .76%, #11 .49%, #12 .49%, #15 2.31%, #16 .29%, #17 .19%, #18 .33%, #19 .77%, #20 .34%, #21 .44%, #22 .94%, #23 .84%, #24 .22%, #25 .22%, #26 .49%	C
19:66-5.7 (j)4. ii	Max. Surface Area of Elec. Billboard Sign	650 SF Max.	NONE	NONE	NA
19:66-5.7 (j)5	MAX. HEIGHT of SIGNS				
19:66-5.7 (j)5.i	Awning, Canopy of Marquee Signs	20' or no higher than the second floor window sill whichever less	NONE	NONE	NA
19:66-5.7 (j)5. ii	Projecting Sign	20' or no higher than the second floor window sill whichever less	NONE	NONE	NA
19:66-5.7 (j)5. iii	Ground Signs	5'	NONE	Signs #5a, #5b – 20 FT	DNC
19:66-5.7 (j)5. iv	Pole Signs	20'	NONE	Sign #3 – 60 FT	DNC
19:66-5.7 (j)5. v	Wall Signs	No higher than the roofline of the wall supporting the sign	NONE	Signs #1 , #15 Above Roof line	DNC

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19:66-5.7 (j)5. vi	Electronic Billboard	40'	NONE	NONE	NA
19:66-5.7 (j)6	MINIMUM SETBACKS FOR SIGNS				
19:66-5.7 (j)6.i	Wall, Awning, Canopy, Marquee, Projecting, Window Signs	None	NONE	Wall Signs – 0' setback	C
19:66-5.7 (j)6. ii	Ground, Pole, Electronic billboard Signs	5'	NONE	Pole Sign # 3 Greater than 5' setback Ground Sign #5a, #5b 8.32 FT	C
19:66-5.7 (j)7	TYPE OF ILLUMINATION				
19:66-5.7 (j)7.i	ALL SIGNS	LED, LCD INDIRECT, AND INTERNAL ILLUMINATION		ALL SIGNS LED, LCD INDIRECT, AND INTERNAL ILLUMINATION	C
19:66-5.7 (j)7. ii	ALL SIGNS	NEON AND OTHER GAS TYPE ILLUMINATION		NONE	NA
19:66-5.7 (k) 1	AUTOMOBILE SERVICE STATION, GAS STATION & CONVENIENCE STORE SIGNS				
19:66-5.7 (k) 1. iii	NUMBER OF SIGNS (Pacific)	2 Wall Signs and 1 Freestanding Sign per frontage	NONE	Rock Stop #3	C
19:66-5.7 (k) 1. iii	NUMBER OF SIGNS (Virginia)	2 Wall Signs and 1 Freestanding Sign per frontage	NONE	Rock Stop #2, #5	C
19:66-5.7 (k) 1. iii	NUMBER OF SIGNS (Maryland)	2 Wall Signs and 1 Freestanding Sign per frontage	NONE	Rock Stop #4, #7	C
19:66-5.7 (k) 1. iv (1)	Max. Surface Area of Signs CONVENIENCE STORE	2 SF per linear foot of building frontage	NONE	Pacific Frontage = 100 FT Rock Stop #3 175 SF Maryland/Virginia Frontage = 50 SF Rock Stop #2 55 SF, Rock Stop #4 55 SF	C
19:66-5.7 (k) 1. iv (1)	Max. Surface Area of Signs CAR WASH	2 SF per linear foot of building frontage	NONE	Maryland/Virginia Frontage = 110 FT Rock Stop #5 245 SF, #7 245 SF	DNC
19:66-5.7 (k) 1. v (1)	Max. Height Wall, Awning, Canopy, Pole, Marquee, Projecting Signs	20' or no higher than the second floor window sill whichever less	NONE	Wall signs: Rock Stop #1 22.6 FT, #2 24.8 FT, #3 24.8 FT, #4 22.6 FT, #5 above roof eave, #7 above roof eave Canopy signs: Rock Stop #9a 21.2 FT, #9b 19.5 FT, #10a 21.2 FT, #10b 19.5 FT, #11a 21.2 FT, #11b 19.5 FT, #12a 21.2 FT, #12b 19.5 FT	DNC

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19:66-5.7 (k) 2	PARKING GARAGE SIGNS				
19:66-5.7 (k) 2. i	Functional Types Permitted	Identification, Current Rate, Tariff, Prohibitory, Closed	NONE	Identification Signs #6, #7	C
19:66-5.7 (k) 2. ii	Structural Types Permitted	Awning, canopy or marquee, ground, projecting, wall, and pole	NONE	Wall Signs #6, #7	C
19:66-5.7 (k) 2. iii (1)	Size of Identification Signs	16 SF Max	NONE	Sign #6 1,089.38 SF, #7 2,978.8 SF	DNC
19:66-5.7 (k) 2. iii (2)	Height of Identification Signs	No lower than 4 FT, No higher than 14 FT	NONE	Sign #6 118 FT, #7 116 FT	DNC

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 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” variances, 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.”



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

- 1) The Applicant requires dozens of variances from N.J.A.C. 19-66:5.7(j)(3) and (j)(5) related to the signage package, as detailed in the site signage schedule in this report. The Applicant states in its CRDA application form that it will be seeking the required variance relief through hardship (C-1) and substantial benefit (C-2) arguments. The Applicant shall provide such statutorily required testimony through a New Jersey licensed professional planner.
- 2) The Applicant shall provide detailed architectural testimony relative to the signage package intention, design, scale, illumination, and relationship to the surrounding area. The testimony shall also explain why the signage package requires dozens of variances, especially as it relates to the existing and proposed site layout and the context of the area, and the overall necessity of the package.
- 3) The architectural testimony shall also detail how the signage relates to the mass of the building. Specifically, the Applicant shall provide 1) an estimate of how many signs were removed from existing building and compare the number of signs to the current proposal and 2) the actual size of the building in terms of floor space to put the variance request in the proper perspective.
- 4) The Applicant's professional planner should discuss the signage package from the context of the purposes of the site, immediate area, and consistency with the signage in the area, specifically other casino hotel properties.
- 5) The Applicant's engineer shall discuss the signage package from the site layout perspective. In particular, discuss the relationship between the ground signs and site triangles/visibility.
- 6) The Applicant shall discuss how the signage package will advance the objectives of the Tourism District.
- 7) The Applicant should furnish testimony relative to whether any other site improvements are proposed in conjunction with the Application.



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We would be happy to address any questions or comments on the above at the public hearing.

Respectfully submitted,

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

cc: Robert L. Reid, AICP, PP, Land Use Regulation Enforcement Officer
Paul G. Weiss, Esq., Chief Legal Counsel
William England, PE, Board Engineer
Applicant's Attorney
Applicant's Engineer