



Council Member Erik Bottcher
224 W 30th St #1206,
New York, NY 10001

September 8, 2025

Re: the proposed casinos in Hell's Kitchen/Times Square (Avenir, Caesar Palace)

Dear Councilmember,

The 1,500 members of our nonprofit organization, CHEKPEDS, have dedicated the last 20 years to reducing traffic and enhancing safety in Chelsea and Hell's Kitchen. The plans from the casinos that we have examined threaten to undo any favorable outcomes you and we have achieved. We urge you to vote against both casinos.

The Avenir, which has its entry and exit on 11th Avenue, runs from West 40th to West 41st Street, Galvin Plaza to 11th Avenue.

For a high-volume destination, this is among the worst places to go. We have faith that the committee will accurately consider the detrimental impacts that the district's citizens would experience on a large scale. A project like this would reverse the traffic-calming effects of the past 20 years, which the locals and elected leaders have contributed to.

Near the Lincoln Tunnel's W 40th Street entrance, on West 41st Street and 11th Avenue, lies the entry/exit road to the Avenir casino. Every day, in the afternoon and evening, this entrance is extremely congested. From 40th Street to 47th Street, 11th Avenue usually has three lanes of compact traffic that obstruct all intersections. Eastbound and westbound lanes of traffic heading toward the Lincoln Tunnel also converge at 42nd Street. Pedestrians find it extremely challenging to cross the street. Many vehicles honk due to the heavy traffic, which lowers the standard of living for the thousands of people who live in River Place, Atelier, and other huge buildings.

There are three lanes full of cars waiting to enter the tunnel, and cars, taxis, and buses attempting to get to the hotel and casino will have to cross in and out of them. Accessing the casino could take up to fifteen minutes.

If the signal timing on 11th Avenue is changed to assist the casino access, the car queues currently extending to 47th Street will likely be extended to 55th Street,



causing significant congestion on these blocks. The increase in delays will cause drivers to use the 11th Avenue bike lane, thus endangering bikers.

- **The petitioner stated that they had no intention of investigating the effects farther up 11th Avenue. It is essential that the DEIS thoroughly examine this matter, extending the study area beyond the nearby blocks to include 11th Avenue to 57th and 10th Avenue to 34th Street.**

The business is aware that patrons of casinos who take buses need room for pickup and drop-off as well as for layovers. However, the DEIS states that a detailed plan for bus storage and drop-off will be created later, before the proposed infrastructure opens. Due to the overabundance of long-distance buses, the community will not tolerate buses that encroach on pedestrian space, idle at the curb, or go through our streets. Our district does not currently have room for bus layovers.

- **Now, rather than later, the DEIS needs to set aside a spot on the casino grounds for loading and unloading buses as well as storing them during the day.**

The applicant will only commit to a post-opening study regarding a traffic enforcement plan.

- **It is imperative to handle transportation enforcement up front, ideally with infrastructure solutions. Delaying post opening is too late.**

Caesar's Palace, West 44th to West 45th Street, 7th Avenue to Schubert Alley

CHEKPEDS' review of the DEIS and the public presentation made by the casino's developers at the July 23 CAC meeting raise deep concerns. Introducing a major casino into the middle of Times Square threatens to unravel nearly two decades of painstaking progress making Times Square and Hell's Kitchen safer and more pedestrian-friendly.

There have been several conflicting mitigation measures put forth, and none of them have gained any credibility. Except for the DEIS, none of them are legally binding. Furthermore, the DEIS recommendations are dreadfully insufficient. The DEIS's mitigation strategy underestimates the number of buses, taxis, and for-hire cars and is unable to accommodate the anticipated influx of people. This is a serious lack of understanding of the distinctive ecology of Times Square, which



has 460,000 pedestrians every day, making it one of the world's densest pedestrian zones.

Among the casino's negative impacts:

Pushing Congestion, Traffic, and Drop-Offs West onto Eighth Avenue

- Caesar's chief strategy to mitigate the additional taxis and for-hire vehicles destined for the casino at Times Square's bowtie is to push them westward onto Eighth Avenue and into Hell's Kitchen. This will adversely affect the lives of neighborhood residents.

Obstructing Bus Lanes

- Directing taxi and for-hire vehicle drop-offs onto Eighth Avenue is doubly problematic because this curb activity will be enticed to the east side of the avenue—precisely where a bus-only lane serves the M20, M104, and at 43rd Street, the M34A Select Bus Service. This will negatively affect thousands of bus commuters who use these lines to reach their homes and work far away from Times Square.

Lack of Provision for Charter Bus Parking and Queuing

- Despite the certainty that a significant portion of its patrons will arrive by charter buses, the casino assumes that only two bus slots will be provided, and the mitigation plan does not detail any provisions for larger queuing areas or loading and unloading—increasing the likelihood of conflicts with pedestrians, cyclists, and other vehicles in the immediate area.

Failure to Accommodate Additional Pedestrian Volumes

- Two sidewalks and four crosswalks are severely negatively impacted and cannot be mitigated. There is no proposed sidewalk widening on West 44th Street to accommodate the relocated 1,700-seat Minskoff Theater, one of the largest on Broadway. These crowds will overflow into the roadway, creating new conflicts.

No plan to accommodate storage of mediscooters

- While this sounds like an excellent idea, it is not clear where these scooters will park to be ready to intervene within 3 minutes. There is no curbside space that can accommodate them.

The mitigation measures proposed by the applicant are inadequate.

- W 44th Street and 8th Avenue is one of two intersections that cannot be mitigated. The cars in this street are currently queuing all the way to 9th



Avenue. The casino will worsen the situation and affect the very residential street west of 9th Avenue. The proposed mitigation of a turn lane on 8th Avenue will obstruct the 8th Avenue bus lane.

- 8th Avenue and West 45th Street is the worst intersection for pedestrian congestion. The applicant proposes to remove a trash can to resolve the congestion.
- In other documents the applicant proposed to create multiple turn lanes on 8th Avenue that will all obstruct the bus lane.
- The applicant also proposes to remove the turn restrictions from West 42nd Street to 8th, 7th, and 6th Avenues. Those restrictions were established to improve pedestrian safety and bus speed and cannot be removed. They will also be crucial to establishing a busway on West 42nd Street.

In direct discussions with the applicant, they claimed that the CEQR did not give them flexibility to propose more aggressive mitigations. This is not accurate. The CEQR manual does allow for a variety of mitigation.

Both casinos have chosen locations in extremely dense and congested areas. The current street infrastructure can barely accommodate current pedestrian and car traffic. Adding large venues in those areas will create further conflicts, delays, and safety risks that cannot be mitigated. The local residents will carry the brunt of such deterioration. We urge you to vote against both casinos.

C. Berthet, co-founder, M. Treat, co-founder,