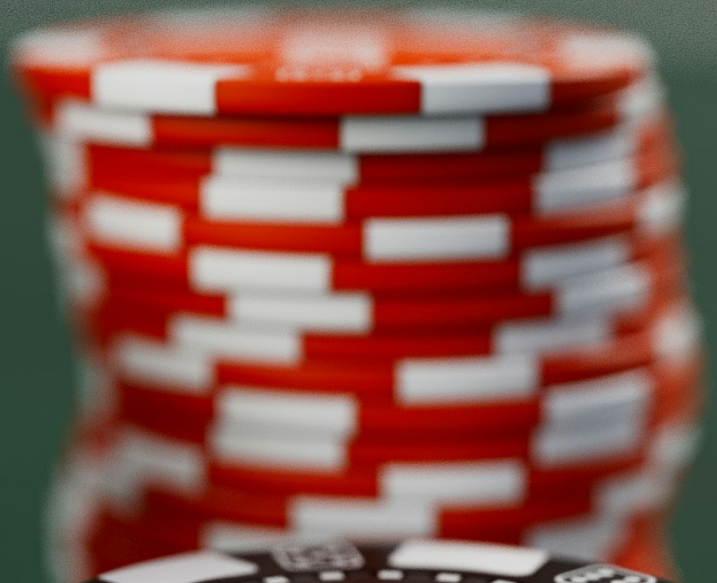


# CASTING THE DICE

CASINOS IN NEW YORK CITY



**NYC**

# Acknowledgements

## **Office of the Mayor**

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*\*Mayoral appointee to a Community Advisory Committee*

Dear New Yorkers:

The prospect of new full-service casinos in the City of New York is one of the most consequential economic development decisions in many decades, with billions of dollars of potential gaming revenue at stake and a multitude of planning considerations to balance.

Since 2022, when the New York State legislature adopted the legal framework for awarding up to three casino licenses in the downstate region, the Adams Administration has diligently engaged with this important process, worked with applicants to ready them for their submissions, and coordinated with City agencies to evaluate each project. The mayor appoints one of six members of each Community Advisory Committee, and our appointees have engaged with everyday New Yorkers to better understand and address community concerns.



The forthcoming decision by the Gaming Facility Location Board and the New York State Gaming Commission—expected by the end of this year—will have dramatic implications for the State and City. In order to inform the Community Advisory Committees and assist the State in coming to the best possible decision, we are issuing this summary report of our analysis of the seven applicants that are located in the five boroughs. Given the Mayor’s Office’s unique citywide perspective, we are also sharing recommendations for the state to consider, both generally and for individual projects, including ways in which New Yorkers can benefit from these substantial projects.

I thank the many City agencies and stakeholders that have provided support to this process. As the downstate casino license selection moves forward, we hope the contents of this report help all parties come to the right conclusions— for the betterment of New York City, New York State, and the host communities for the potential casinos.

Sincerely,

A handwritten signature in black ink, appearing to read "Adolfo Carrión, Jr." with a stylized flourish at the end.

Adolfo Carrión, Jr.

Deputy Mayor for Housing, Economic Development, and Workforce

# Background

## *Legislative History*

Over the past half-century, New York has steadily expanded its approach to legalized gaming. For much of the 20th century, the State Constitution prohibited nearly all forms of gambling. That began to change with the creation of the state lottery in 1967 and the authorization of off-track betting (OTB) in 1970. In the early 2000s, the Legislature allowed “racinos” - horse tracks operating video lottery terminals (VLTs).

The most significant change came in November 2013, when voters approved a constitutional amendment authorizing up to seven full-scale casinos outside of tribal lands. The measure aimed to spur economic development, create jobs, and direct new revenues to education and local governments. To protect upstate operators, the amendment included a ten-year moratorium on downstate licenses. Four upstate “destination resort” casinos were awarded in 2014–2015.

In 2022, as part of the state budget, the Legislature authorized up to three full-casino licenses in downstate New York (including New York City, Long Island, and Westchester), accelerating earlier plans. The law specified that successful applicants would pay large license fees—reportedly around \$500 million per license - and directed much of the new revenue toward the Metropolitan Transportation Authority (MTA).

State legislation prescribes processes for proposal solicitation, public feedback, ranking criteria, and the licensing timeline. The entities charged with overseeing this process are the New York State Gaming Commission and the Gaming Facility Location Board.

## *Casinos in New York*

The New York State Gaming Commission regulates all forms of legal gaming in the state, including the lottery, pari-mutuel racing, VLT racinos, Indian gaming under federal compacts, sports wagering, fantasy sports, and charitable gaming.

Downstate, commercial gambling has historically been limited to racinos at Yonkers Raceway and Aqueduct Racetrack in Queens. These facilities operate thousands of VLTs but do not offer live table games. The shift to full casino licenses represents a major expansion.

Today, New York has four licensed commercial casinos upstate and two large racinos downstate, alongside tribal casinos operated under federal agreements. The new downstate licenses will be the first full-scale casinos in or near New York City.

## *Economic Benefits*

The State projects that licensing up to three downstate casinos could generate billions in upfront license fees and ongoing gaming tax revenues, with a significant share earmarked for the MTA. In addition, each project represents a multibillion-dollar private investment with ripple effects on construction, employment, and tourism.

Casinos are also expected to create permanent jobs, from gaming operations to hospitality, food service, and entertainment. Applicants have included community benefit pledges, open space and infrastructure improvements, and commitments to workforce training and MWBE participation.

For New York City, the broader benefit is maintaining its position as a global tourism destination. A well-designed project can draw both visitors and locals, integrating gaming into a mix of entertainment, culture, and hospitality offerings.

## *Known Issues*

Casinos also carry risks that require careful management. Studies from other jurisdictions highlight concerns including:

- Gambling addiction and related social costs.
- Crime, money laundering, or other public safety impacts.
- Gentrification and displacement pressures around major projects.
- Strain on local infrastructure, including traffic, transit, and public services.

Addressing these risks requires upfront planning, robust regulatory oversight, and enforceable commitments from licensees.

## *City Role*

Although licensing authority rests with the State, the City has played a central role in shaping this process. Applicants must comply with zoning and land use requirements, which in many cases required City Council action. Agencies including City Planning, DOT, Parks, DEP, and EDC have been engaged in reviewing potential impacts.

The Mayor's appointees to the Community Advisory Committees (CACs) provide another channel for the City to advance its interests. Through these appointments, the City has emphasized equity, workforce opportunities, and community benefits alongside fiscal considerations.

## *State Role*

As outlined in the January 2023 Request for Applications to Develop and Operate a Gaming Facility (RFA), the New York State Gaming Facility Location Board outlined a process to review applications for the three casino licenses, including economic, land use, siting, and review criteria. The initial review process is in the form of a local Community Advisory Committee (CAC) review and approval pertaining to each individual application. Each application undergoes a public review and open meetings process led by a six-member Community Advisory Committee (CAC), representing:

- New York State Governor
- New York City Mayor
- Local New York State Assemblymember
- Local New York State Senator
- Local Borough President, and
- Local New York City Council member.

Gaming facility teams will submit detailed applications to be reviewed by the CAC which will then hold public hearings and issue a finding establishing public support either for approving or disapproving the application by a two-thirds vote. Applications approved by the CAC are forwarded to the Gaming Facility Location Board (the Board) to ensure zoning compliance. The Board would then review those applications based on the following criteria: economic activity and revenue impacts; local siting impacts; workforce enhancement; and diversity framework. The Board may select up to three applications to forward to the Gaming Commission for final licensing decisions.



## Process

### Recap of City Actions Since 2022

Since mid-2022, when the New York Legislature amended the Gaming Act to accelerate the bidding and selection process for the downstate casino licenses, the Mayor's Office has engaged with stakeholders to prepare for the State's process.

When the State released its Request for Applications (RFA) in January 2023, and in subsequent Q&A documents released in August 2023 and December 2024, it became clear that certain actions by the City would be necessary to enable competitive applications within NYC.

Among the issues requiring City attention was that a "casino" or "gaming facility" was not a permitted use in the New York City Zoning Resolution (ZR), and thus a casino could not be built in the city. One of the key requirements outlined in the RFA is that all applicants must demonstrate conformance with local land use regulations. Thus, without City action, applicants could not meet a key RFA requirement.

To remedy this, the Mayor's Office worked with the City Council, which approved necessary zoning text amendments to allow casinos in commercial or manufacturing districts.

By the time of the RFA deadline on June 27, 2025, the City had been in discussions with all applicants for over two years, offering consistent and equal support without privileging or disadvantaging any single applicant.

### General ULURP

The City uses ULURP (Uniform Land Use Review Procedure) to make changes to the ZR such as a rezoning or de-mapping, which were necessary for casino sites. ,

The ULURP process includes a public review process with a community board review, Borough President input, City Planning Commission review, and City Council vote.

In 2023, in anticipation of the State's RFA casino process, The Department of City Planning introduced a text amendment that adds casino gaming by reference to the ZR. The text amendment was advanced in coordination with the City Council and was presented to every community board across the city.

Specifically, the approved text amendment permits up to three gaming facilities as a permitted use in commercial districts C4, C5, C6, C7, and C8, and manufacturing districts M1, M2, and M3, in the ZR for the first time. This modification of the ZR would allow a

gaming facility licensed by the State and chosen through the State-defined siting process, to be deemed compliant with the ZR.

## Application-Specific ULURPs and Approvals

There were four gaming facility proposals that needed additional land use and planning actions in order to demonstrate compliance with the RFA: Bally's at Ferry Point Park in the Bronx; Queens Future / Metropolitan Park in Flushing Meadows Corona Park; the Coney in Coney Island Brooklyn; and the Western Rail Yards, which subsequently withdrew their gaming application.

The remaining three applications received City Council and state approvals.

- Bally's Bronx proposal: received approvals for state parkland alienation and zoning changes through the Legislature and City Council in 2025.
- Coney Island (The Coney): received approvals for street de-mapping and other associated actions in 2025.
- Metropolitan Park: received approvals for state parkland alienation and ULURP in 2025.

## City review of applications

Each gaming facility proposal was required to have been submitted to the State by June 27, 2025. Upon receipt of applications, the City immediately commenced a comprehensive interagency review of each proposal.

- Lead agencies: Mayor's Office, DCP, EDC
- Involved agencies: Parks, DOT, DEP, MOEC, Law, OMB

Each gaming facility was required to complete the state's environmental review process ("SEQRA") (including coordinated CEQR review) by September 30, 2025. Upon receipt of environmental review documents, the City immediately commenced a comprehensive interagency review of the environmental review analysis.

- Lead agencies: DMHEDW and DCP for projects requiring City actions and CEQR review; State Franchise Oversight Board and Gambling Commission for projects requiring coordinated SEQRA review with City agencies
- Involved agencies: Parks, DOT, DEP, MOEC, LPC, DOHMH, DSNY, Law

Environmental review timelines for FEIS completion for each project were as follows:

- CEQR projects
  - Queens' Future 2/23 - 2/25



- Bally's 3/2024 - 6/2025
- Coney Island 5/24 - 4/25
- WRY 2/24 - 3/25 (project withdrawn)
- SEQRA projects
  - Resorts World 10/24 - 6/25
  - Avenir 4/25 - 6/25
  - Caesar's Palace 4/25 - 6/25
  - Freedom Plaza 4/25 - 6/25

## Community Advisory Committee (CAC) Process and Appointees

After applications closed June 27, 2025, CACs were formed for each proposal. CAC membership (for NYC proposals) includes appointees of Governor Hochul, Mayor Adams, and the other electeds representing the proposed casino site, *i.e.*, the State Senator, Assemblymember, Borough President, and City Councilmember.

- CACs must hold at least two meetings and two public hearings, culminating in a binding two-thirds majority vote approving whether a bid may proceed.
- CACs can request written modifications but not changes that affect environmental review
- CACs must vote on the gaming applications by September 30, 2025. In each instance, the Mayor's Office has supported and encouraged the CACs to use the full amount of time allotted for the review process.

All gaming applications that are approved by a two-thirds majority of a CAC will be forwarded to the Gaming Facility Location Board for review and approval. The Gaming Facility Location Board will award up to three gaming licenses.

## State selection process after conclusion of the CACs

For casino projects that achieve a successful vote by the Community Advisory Committees, these applications next move on to the Gaming Facility Location Board (the Board), a body appointed by the State Gaming Commission. After the CAC process concludes, the Board is authorized to review eligible applications, determine license fees, and issue findings of facts. The Board is expected to recommend up to three applicants for licensure to the State Gaming Commission. The Gaming Commission will subsequently review the recommendations of the Board and complete the award of up to three licenses by December 31, 2025.

## *Applications*

### **Site-by-Site Description**

*The Avenir Hudson Yards* is located on the West Side of Manhattan, bounded by West 40<sup>th</sup> Street, West 41<sup>st</sup> Street, 11<sup>th</sup> Avenue and Galvin Avenue, a Lincoln Tunnel access road. The applicant team is comprised of Silverstein Properties, Rush Street Gaming, and Greenwood Gaming. The team has proposed a single development bound by a city block, featuring a gaming facility, meeting and convention space, restaurant food hall, community facility, and a hotel tower. The team plans to invest approximately \$7 billion across 1.6 million gross square feet.

*Freedom Plaza* is located in Midtown East, bound by FDR Drive and 1st Avenue, and between East 38th and East 41st Streets. The project is being led by the Soloviev Group and Mohegan Sun. The team has proposed a large-scale, mixed-use development that envisions street-level public open space, Museum of Freedom and Democracy, food hall, hotel, spa, medical office, local retail, luxury condos, affordable housing – including homes for purchase – and sublevel gaming facility space and parking. The anticipated investment is \$11 billion over 4.1 million gross square feet.

*Metropolitan Park* is located on a portion of the existing western parking lots of Citi Field in Flushing Meadows Corona Park, Queens. The project is led proposed by Steve Cohen – owner of the site’s tenant, the New York Mets – and Hard Rock. The team has proposed a gaming facility atop a parking podium, including hotel, music and entertainment hall, restaurant food hall, retail, and community space. The project includes significant infrastructure investment adjacent to gaming facility site, including construction of a 23-acre Metropolitan Park, 7,500 parking garage spaces for Citi Field, delivery of the ‘Taste of Queens’ podium (a facility to be developed by the Mets at a future date), and reconstruction of the MTA Willets Point 7-train station. The total project investment is anticipated to be \$8 billion across 5 million gross square feet.

*Resorts World New York City*, operated by the Genting Group, proposes a \$5.5 billion transformation of its existing Video Terminal Lottery facility at the Aqueduct Raceway site in South Ozone Park, Queens into a 5.6 million square foot integrated resort, featuring a 500,000 square foot casino with 6,000 slots and 800 tables, 2,000 hotel rooms, a 7,000-seat arena, over 30 dining options, a spa, and community greenspace.

*Caesars Palace Times Square* is located in Times Square, Manhattan. The applicant team is comprised of Caesars, SL Green, Live Nation and Roc Nation. The team has proposed to convert an existing, underutilized office building with street level retail and Minskoff

Theatre into a gaming facility, hotel, entertainment venue, and retail space. The total investment in the project is expected to be \$5.4 billion across 1.8 million gross square feet.

*The Coney* is centrally located within Brooklyn's Coney Island amusement parks and other entertainment facilities. The applicant team is comprised of Thor Equities, Global Gaming Solutions (the commercial operating company of The Chickasaw Nation) and Saratoga Casino Development. The company has proposed a gaming facility that includes, in addition to a casino, a convention center, entertainment venues, retail space, restaurants, and a hotel. The facility includes a publicly accessible rooftop. The expected investment is \$3.4 billion across 1.5 million gross square feet.

*The Bally's Bronx Gaming Facility* is located at the southern portion of the Bally's Golf Links and Ferry Point. The Bally's Corporation makes up the applicant team. The company has proposed an integrated resort, separated from residential areas, that includes a gaming facility, convention center, entertainment venues, retail space, restaurants and a hotel. The expected investment is \$4.0 billion across 3.0 million gross square feet.

## Comparative analysis of applications

To inform the City’s position and recommendations regarding the casino license selection process, the City undertook a comprehensive review of all the applications submitted—both public information and other information provided to Community Advisory Committee members, as permitted by state law. To organize this analysis, the Office of the Mayor assigned two review teams to examine different aspects of the proposals.

A first team led by the New York City Economic Development Corporation reviewed the financial and economic elements of the proposals, including 1) development program, 2) proposed community funds, 3) development feasibility, 4) economic impact and fiscal returns, 5) workforce development, and 6) M/WBE strategies.

A second team led by the Department of City Planning examined the land use and design elements of the proposals, including 1) location and neighborhood context, 2) transportation and site access, 3) public realm and utilities, 4) primary and accessory uses, 5) building massing and form, and 6) environmental factors. Each team consulted with other agencies and with the Mayoral appointees to the CACs during their review.

What follows is some of the analysis that was prepared during this review, and which demonstrates the broad spectrum of proposals that emerged during this process. While the City reviewed applicants’ full unredacted submissions in the course of its evaluation, only materials suitable for public disclosure are included here.

## Comparison of Proposed Development Programs

Investment & Size	Bally’s	Coney	Avenir	Caesars	Freedom	QF	Aqueduct
TDC*** (\$B)	\$3.9	\$3.4	\$7.0	\$5.4	\$11.1	\$8.1	\$5.5*
<b>Program: Gaming</b>							
Slots/ETG (#)	3,500	4,500	3,680	3,146	5,700	5,000	6,000
Table Games (#)	250	230	260	191	400	375	800
Poker Tables (#)	-	-	50	24	50	30	-

The Casino RFA proposals represent a wide range of investment levels, from \$3.4 billion to \$11.1 billion, reflecting variations in both development scale and site location.

The Aqueduct and Caesars development costs reflect redevelopment of existing facilities--an expansion of the current VTL facility at the Aqueduct Racetrack in the former, and a conversion of an existing Midtown tower in the latter. Aqueduct figures also account for \$1.1 billion in prior investments in the existing facility.

## Comparison of Proposed Hotel Program

	Bally's	Coney	Avenir	Caesars	Freedom	QF	Aqueduct
Rooms (#)	500	500	1,000	922	1,251	1,000	1,963

The Aqueduct and Freedom Plaza proposals include the largest hotel programs among respondents, while Bally's and The Coney propose the smallest, with site location driving hotel demand and synergies with existing supply.

## Comparison of Proposed Development Plans

	Bally's	Coney	Avenir	Caesars	Freedom	QF	Aqueduct
<b>Team experience</b>	National casino builder	TX, OK, and NY casinos	WTC, Disney HSQ, Silver Towers, Four Seasons, national casinos	1 Vanderbilt, 1 Madison; Live Nation, Caesars resorts	Various MN resi sites; Mohegan Sun & South Korea	Hard Rock worldwide, JFK T6, 175 Park, Lehigh Starrett	Aqueduct, Catskills, Hudson Valley, Las Vegas, global

The respondent teams have a wide variety of experience with a number of proposers having previously developed projects at a scale comparable to their current proposals.

## Comparison of Fiscal Impacts

	Bally's	Coney	Avenir	Caesars	Freedom	QF	Aqueduct
<b>Tax Revenue Net of Benefits, Gross (30-Yr NPV)</b>	\$576.1	\$457.8	\$885.5	\$455.4	\$1,555.8	\$1,435.0	\$756.4
<b>Property Tax, Gross (EDC), Stab. Year 1 (NPV)</b>	2032 \$24.3	2032 \$16.5	2033 \$27.8	2032 \$5.1 (\$35.7)	2033 \$58.3	2032 \$46.0	2033 \$17.5
<b>Property Tax, Gross (Developer), Stab. Year 1 (NPV)*</b>	2032 \$29.0	2032 \$16.5	2033 \$46.7	2032 \$13.7 (\$37.1)	2033 \$50.5	2032 \$47.1	2033 \$24.1
<b>Gross Gaming Tax Revenue, Gross (EDC) (30-Yr NPV)</b>	\$2,822.4	\$3,572.0	\$2,865.4	\$2,502.7	\$4,497.1	\$4,036.3	\$1,597.1
<b>STX and MRT Revenue to NYS, Gross (EDC) (30-Yr NPV)</b>	\$174.4	\$177.4	\$210.5	\$211.2	\$331.4	\$294.1	\$225.4

Tax revenue Net of Benefits, Gross (30-Yr NPV) is tax revenue collected by NYC only. While NYC benefits from property tax and other City taxes, the majority of tax revenue will come through Gaming Tax, which is collected by the state.

## Comparison of Anticipated Economic Impact

	Bally's	Coney	Avenir	Caesars	Freedom	QF	Aqueduct
Construction Jobs, Direct	6,936	6,976	11,269	7,190	17,907	16,224	7,942
Construction Jobs, Indirect & Induced	3,297	3,316	5,356	3,417	8,511	7,711	3,775
Permanent Jobs, Direct	1,547	1,617	1,822	2,017	2,736	2,559	1,765
Construction Economic Impact, Net New (NPV) (\$M)	\$1,623.4	\$1,627.6	\$2,642.9	\$1,676.6	\$4,193.5	\$3,787.9	\$1,855.4
Operations Economic Impact, Net New (30-Yr NPV) (\$M)	\$7,256.8	\$10,674.1	\$9,884.8	\$9,650.6	\$10,113.3	\$11,525.2	\$7,629.7

## Application-specific recommendations

### *Avenir*

The Avenir proposal offers a major opportunity to bring economic activity to Manhattan's Far West Side, an area poised for transformation with the reconstruction of the Port Authority Bus Terminal and the continued build-out of Hudson Yards. As one of the largest of the casino proposals by total development cost, the project carries significant potential for job creation, economic impact, and fiscal returns for both the State and City. Its scale and location also mean it will shape a critical gateway between Midtown, the Hudson River, and regional transportation networks.

### Recommendations:

- Applicant and the State should work with the MTA to prioritize the construction of the 10<sup>th</sup> Avenue 7-Train extension with revenues generated by this proposed development. In a 2023 report issued by MTA, the agency projected the cost of the station at \$1.9 billion and at the time ranked the project as low priority given low projected ridership. These assumptions should be revisited, and a viable plan and implementation schedule established.
- A comprehensive transportation management plan should be advanced, addressing both construction-period impacts and long-term operations. Given the project's adjacency to the Lincoln Tunnel access roads and other major arteries, loading, access, and circulation must be carefully coordinated with City and State agencies.
- Public realm and design refinements are needed to strengthen the project's role as a new anchor in West Midtown. The southern frontage at Galvin Avenue and



West 41st Street should be programmed with pedestrian-oriented amenities and active uses to create a welcoming entry plaza. The Galvin Avenue sidewalk should be widened on the applicant's property to meet NYC standards, improving connectivity to surrounding streets. At the northwest corner, the multi-function space entrance should be aligned with sidewalk grade to create an accessible, inviting entry without reliance on long ramps or steps.

- To enhance wayfinding and activation, the food hall should be located on a lower level with escalator access from the sidewalk, paired with complementary uses near elevators. This would strengthen the connection between interior spaces and the street-level environment.
- The project should demonstrate leadership on sustainability by committing to a certification higher than LEED Silver, consistent with its scale and location in a high-profile district. Building performance measures should incorporate resiliency, energy efficiency, and climate adaptation features.
- On housing, the applicant should increase the percentage of permanently affordable units in its off-site proposal to better align with City housing priorities and ensure the project delivers meaningful long-term community benefits.

## *Bally's*

Bally's Bronx Gaming Facility is proposed for the southern portion of Bally's Golf Links at Ferry Point, transforming a City-owned golf course into a \$4 billion, 3.0 million-square-foot integrated resort. The project envisions a gaming facility, convention center, entertainment venues, retail space, restaurants, and a hotel, designed to be separated from surrounding residential areas. The proposal also includes off-site park improvements and enhancements to Ferry Point Park and its waterfront paths, which have the potential to deliver lasting benefits to adjacent neighborhoods.

### Recommendations:

- To ensure equitable access, the applicant should commit to fully funding expanded transit service, including extending and increasing frequency of the NYC Ferry's Soundview route, and providing shuttle bus connections between Ferry Point and upland neighborhoods. Clear commitments are also needed regarding bus service enhancements, stop improvements, and coordination with MTA to ensure reliable service to the site. Specifically, the applicant should:
  - Sponsor the NYC Ferry parking lot shuttle
  - Sponsor transit service connecting upland communities to the Ferry Point Park landing

- Upgrade ferry landing infrastructure, including shuttle storage facilities, waiting area shelters, and electrical upgrades.
- The design of site access should prioritize pedestrian safety and connectivity. The applicant should coordinate with NYC DOT, Parks, and MTA to minimize and strategically locate curb cuts, integrate pedestrian-oriented design strategies such as shaded walkways, resting areas, and bicycle infrastructure, and provide direct connections between the facility, Ferry Point Park, and the waterfront path.
- Open space enhancements should go beyond minimum requirements to deliver a welcoming, resilient, and accessible public realm. This includes adding diverse seating and programming, improved lighting, and ecological plantings; ensuring ADA connectivity and universal design; and strengthening physical and visual connections between the facility's lower levels and the waterfront.
- Building massing and design strategies should be refined to better integrate the resort into its parkland setting. Reconfiguring the proposed skybridge, activating ground-level connections, and expanding landscaping diversity will improve contextual sensitivity. Roofs and building systems should incorporate robust sustainability measures, including larger vegetated roof areas, photovoltaic panels, organic waste processing, and on-site wastewater treatment to reduce potable water use and discharge.
- Given the project's scale and location within a highly visible park setting, the City encourages the applicant to go beyond LEED Gold and pursue a higher standard of environmental certification, positioning the project as a state-of-the-art model for sustainable development in New York City.

## *Caesars Times Square*

With its proposal to bring a commercial casino to the Crossroads of the World, the Caesars Times Square project would bring new economic vitality and visitors to one of New York City's most recognizable destinations. The project would repurpose an existing office building, resulting in a comparatively low disruption during construction, and would take advantage of the abundance of transportation options located in Times Square.

## **Recommendations:**

- Planning for transportation at this dense site will require careful planning and execution. As the casino proposal with the best access to public transportation, there is an opportunity to invest in area subway stations and even explore in-building connections and access points to the subway. The project's loading, car

park, and bus operations plans should be coordinated with NYC DOT, and monitored on an ongoing basis after construction. Casino patrons should be encouraged to utilize public transportation, as feasible.

- Times Square is already a vibrant destination for tourists and residents, with some of the City's top eateries, nightlife, and cultural attractions all clustered in this special place. The casino has the potential to add to these offerings and bring more economic vitality to the area, particularly if local businesses and entertainment venues partner with the proposed project to develop mutually beneficial programming.

## *The Coney*

Located in the heart of Coney Island's storied and historic amusement district, The Coney is a proposal to bring a commercial casino to Brooklyn's premiere Beach and Boardwalk entertainment district. The proposal has the potential to build on decades-long efforts to revitalize this unique neighborhood, which has benefited from billions of dollars of public and private investments since a major rezoning over 15 years ago.

## Recommendations

- As the project advances, it is essential that the massing is refined to better highlight historic amusements, including the Luna Park Gateway and the Riegelmann Boardwalk. Relocating the hotel tower and shaping the structure would also enhance visibility of the Wonder Wheel, an iconic landmark. To strengthen the project's connection to its setting, the applicant should integrate smaller amusement-related uses along Wonder Wheel Way, Bowery, and Jones Walk. In general, the project's proposed skybridges risk overwhelming the pedestrian realm. The City recommends reducing the size of the skybridges to minimum amount viable to connect the various buildings.
- Given the increased volume anticipated to arrive at the site via public transit, the City encourages the applicant to coordinate with the MTA on targeted transit investments, such as station circulation upgrades, ADA improvements, and enhanced transfer connections. These upgrades will be critical to expanding visitor access beyond the local market.
- To support reducing congestion in this high-foot-trafficked location, additional innovative loading strategies such as flexible and shared loading zones for smaller establishments should be integrated.
- The proposal should also integrate into the City's emergency response network, in coordination with NYCEM, MOCEJ, and other agencies, to ensure resilience

planning is embedded in project operations, and should formalize its role as a peninsula-wide resilience hub, with capacity to provide critical services such as cooling, heating, food, shelter, communications, and dedicated FDNY/EMS space during emergencies.

## *Freedom Plaza*

Freedom Plaza is a proposed \$11 billion, 4.1 million-square-foot mixed-use development located in Midtown East, bounded by FDR Drive, 1st Avenue, and East 38th to East 41st Streets. The project envisions a combination of public and private uses, including a Museum of Freedom and Democracy, food hall, hotel, spa, medical offices, local retail, luxury condominiums, affordable housing gaming facility and parking. At its center, the proposal emphasizes a large public open space that seeks to serve as both a community anchor and a gateway to the East River waterfront.

## Recommendations

- To ensure the project delivers long-term community benefits, the applicant should establish a dedicated fund to finance a future pedestrian skybridge connecting the development's main open space to the Manhattan Greenway, strengthening east-west access to the waterfront.
- Transportation planning must be coordinated with City and State agencies to minimize local traffic impacts. The applicant should clarify commitments around off-site parking and shuttle operations, provide detailed traffic simulation analyses for the proposed East 38th Street signal, and demonstrate how large truck deliveries will be safely accommodated. The two-way conversion of East 41st Street should be paired with measures to address bus layover and diplomatic parking needs.
- Site design should prioritize pedestrian safety and public accessibility. *Porte-cochères* should be reduced or removed to avoid conflicts with sidewalk activity and strengthen connections to Robert Moses Playground and adjacent streets. Additional sidewalk-level gathering space at 1st Avenue and East 39th Street should be provided to improve circulation and wayfinding for visitors.
- Open space programming and governance should ensure that community and City voices are embedded in long-term management. Public signage should clearly indicate hours and access, while the proposed Open Space Advisory Committee should include City representation. Terraced open spaces should be designed for universal access, with consolidated elevators to better serve families, seniors, and stroller users.

## *Metropolitan Park*

The Metropolitan Park is proposed for a portion of the existing western parking lots of Citi Field in Flushing Meadows-Corona Park, Queens. The project envisions an \$8 billion, 5 million-square-foot mixed-use development anchored by a gaming facility built atop a parking podium. The proposal includes a hotel, music and entertainment hall, restaurant, food hall, retail, and community space, alongside significant infrastructure investments. Key elements include a new 23-acre Metropolitan Park, 7,600 structured parking spaces to support Citi Field, delivery of the “Taste of Queens” podium, and reconstruction of the Mets–Willets Point 7-train station. In addition to the proposed Metropolitan Park investment, the applicant should contribute to Flushing Meadows–Corona Park priorities identified by NYC Parks, including the Passerelle Bridge, and commit to ending the use of park lawns for event parking by accommodating overflow parking within its own facilities.

### **Recommendations:**

- While the applicant’s commitment to Metropolitan Park represents a significant public amenity, further investment is needed in Flushing Meadows–Corona Park. Priorities include upgrades to the Passerelle Bridge and a firm commitment to eliminating the use of park lawns for overflow event parking by accommodating all demand in structured facilities.
- Transit upgrades should extend beyond reconstruction of the 7-train station to include full ADA accessibility, safer pedestrian approaches from the Passerelle, and improvements to the Willets Point LIRR station. These measures are essential to support large-scale visitation and to reduce auto dependence in an already congested corridor.
- To address traffic and circulation challenges, the applicant should establish a governance body that includes NYC Parks, DOT, and local stakeholders to coordinate scheduling of major events. In addition, revisions to garage design are warranted: relocating the Taste of Queens entry closer to Seaver Way and maintaining the Shea Road alignment at the Northgate parking garage will minimize pedestrian–vehicular conflicts and unnecessary circulation.
- Several design refinements would be better integrated with the project with its surroundings. The City requests the applicant to remove large-format casino and commercial signage, activate Seaver Way and Roosevelt Avenue with ground-floor uses, provide clear ADA-accessible circulation and wayfinding, and include adequate public restroom facilities across the site. Along Roosevelt Avenue, garage design should be revised to avoid a “canyon effect” and to enhance pedestrian

safety. Finally, Metropolitan Park should be designed to accommodate Mets gameday security needs without compromising accessibility or public enjoyment.

## *Resorts World*

As an existing Video Lottery Terminal (VLT) location and one of the highest grossing casinos in the nation, the Resorts World proposal provides an opportunity to bring a full-scale commercial casino operation on the fastest schedule among the NYC proposals. Already an integrated part of the Southeast Queens community, Resorts World has the potential to expand its positive community impact through investments in housing, community services, and more.

## **Recommendations:**

- As this project occupies State property and is already an existing VLT location and given that much of the development costs highlighted in the application have already been spent on prior phases, the future fiscal returns and economic impacts to the City are less than anticipated. In consideration of this, Resorts World proposes a robust Community Fund and other investments. It is critical that such investments are carefully considered and selected on their merits. Furthermore, it is critical that the City is represented on any governance body charged with the allocation and disbursement of such funds, and that resources are dedicated to meeting the local needs generated by this project.
- While Resorts World predicts that most of its customer base will continue to arrive by private vehicle or bus, the city encourages the applicant and the State, through the MTA, to consider further improvements to the A train stations at Aqueduct Racetrack and Aqueduct North Conduit Ave.
- Several design enhancements would benefit the project, including better integrating public realm with surrounding neighborhoods by increasing pedestrian permeability, better programming the proposed promenade with active and passive recreational uses, and breaking down the massing of the proposed buildings with more height variety and articulation.
- Finally, Resorts World has rightly pointed to other portions of the Aqueduct Racetrack site as a prime opportunity to build more housing, an idea that also has support among many local stakeholders. However, Resorts World does not control these additional parcels, and the State has not made any commitment to their development, despite the imminent closure of the racetrack in 2026 as operations move to Belmont. The City believes that any further expansion at Resorts World should be paired with a clear commitment by the State, including the New York Racing Association and the Port Authority, which occupy portions of the site, to



proceed with planning for the over 170-acre site on an accelerated schedule. Such planning should be done in close coordination with the City, or alternatively the State should transfer jurisdiction of the entire site to the City of New York to plan and develop through City processes, which provide opportunities for local stakeholder input. Resorts World has proposed funding initial planning and infrastructure investments to unlock more housing, and we should start in this facility's backyard.

## *General Recommendations*

In addition to the specific application recommendations articulated above, the City provides the follow general recommendations to apply to all applicants and to the process for selecting licenses and enforcing contractual commitments.

## *Treatment of Revenues by the State*

The casinos have the potential to generate windfall tax proceeds for the State of New York, which has in turn pledged to direct those revenues to the MTA. As specified in the enabling State Legislation, the city will not participate in gaming tax revenues. Because many of the impacts of the casinos will be felt at a local level, we urge the State to consider a revised, regular distribution of gaming revenues such that adequate reinvestment into affected neighborhoods and direction of proceeds to local needs are addressed. This should be addressed in the forthcoming 2026 State Legislative Session, unless the State has sufficient discretion to make these revisions.

## *Community Benefit Fund Governance & Accountability*

Several applicants have proposed community benefit funds with a variety of formats and contemplated structures. While such funds could be helpful in ensuring impacts are mitigated and local needs are met, they also could be rife for abuse or for misallocating funds based on politicized prioritization. If the Gaming Commission allows such funds to be established, it should require a clear, independent governance structure with annual reporting, community board oversight, performance metrics, and third-party audits. All applicants should be directed to incorporate best practices and to ensure that any community funds are deployed responsibly and not squandered or abused. The Gaming Commission should require such funds to establish governance structures that include duly-elected local representatives—including the Mayor, Borough President, and City Council—to ensure accountability in decision-making and timely disbursement.

## *Commitments in Gaming Licenses*

It is incumbent upon the Gaming Commission to ensure that commitments and pledges made by license applicants are appropriately codified in contractual agreements and that enforcement mechanisms, with meaningful penalties for noncompliance, are structured and adequate. The City recommends that these agreements include enforceable requirements: local hiring percentages, affordable housing, transit improvements, and penalties if benchmarks are unmet.

## *Transparency in Decision Making and Oversight*

The stakes are too high for New Yorkers to be left in the dark about how the location decisions for casinos will be made. And once locations are selected, it's imperative that the State create meaningful mechanisms to ensure ongoing oversight and hold applicants responsible for meeting their pledges and commitments. The Gaming Commission and Gaming Facility Location Board should inform New Yorkers on how they have come to these important decisions, including releasing a fulsome report on the facts and considerations that informed their review and selection of licensees. A clear description should also be released publicly explaining how New Yorkers can be assured that contractual commitments are honored going forward.

## *State Commitment to Local Quality of Life, Addiction Treatment, and other Social Initiatives*

While the State and MTA will be the primary beneficiaries of tax revenues from the proposed casinos, as per State Legislation, the potential negative impacts of any casinos will be borne by local communities and by the City. Where there are negative externalities from casino use in the City—for example, crime, gaming addiction, traffic, or other quality of life concerns—the State should provide direct resources to the City to meet these needs. These investments should begin immediately and should be included in the 2026 State Budget due on April 1, 2026.

## *Prioritizing MWBE Participation*

The State must enforce stringent MWBE targets on construction and operations, and the City recommends that the Gaming Commission ensures that all licensees meet or exceed MWBE contracting targets, through binding commitments in the licensing agreements.

## *Planning for Workforce Strategies*

The City recommends that the State compel all applicants to put forward detailed workforce plans to ensure local communities have access to jobs, prioritizing unionized workforce and labor protections that will ensure living wage.

## **Conclusion and next steps**

Commercial casinos in New York City represent both tremendous opportunity and significant considerations that must be carefully weighed. Over the past three years, the City has worked with potential applicants, coordinated with City and State agencies, and received public input from everyday New Yorkers. As the New York State Gaming Commission deliberates in the months ahead, we are hopeful that this report provides helpful information to ensure the best possible outcomes for New York City.