

November 8, 2012

Massachusetts Gaming Commission  
84 State Street, Suite 720  
Boston, MA 02109

Dear Commissioners:

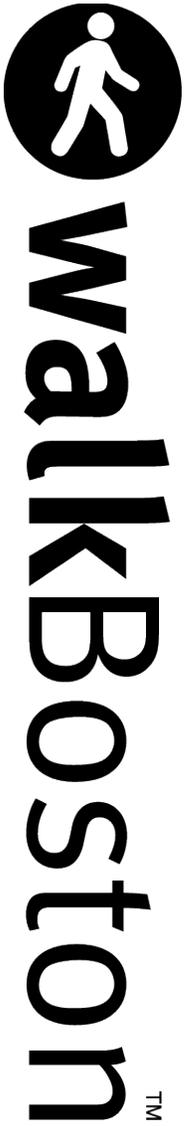
WalkBoston is pleased to provide to the Commission our thoughts about ways in which the casino developments might bring benefits to the Commonwealth that go beyond the economic realm. Our attached statement includes a number of criteria that we believe should be used in the evaluation of the development proposals.

We would be pleased to meet with the Commission and present these ideas in person if you think it would be useful for your deliberations.

Thank you for your consideration of our ideas.

Best regards,

Wendy Landman  
Executive Director



## **WalkBoston Statement on Casinos:**

### **An Opportunity to Provide a Variety of Transportation Options and to Enhance Physical and Operational Relationships with Adjacent Communities**

November 8, 2012

WalkBoston is the Commonwealth's leading advocate for pedestrians and safe walking. We work throughout the state – encouraging walking, advocating for pedestrian improvements and working for design improvements. We provide the following comments to the Massachusetts Gaming Commission in the hope that the Commission will include our suggestions in the guidance given to prospective developers.

Planning for three casinos in Massachusetts can serve as an opportunity to connect the proposed developments with host communities and surrounding locations and to address their potential impacts and benefits for transportation and community cohesion. Because the casinos are intended to be “entertainment destinations” and not simply gaming parlors, WalkBoston believes that the casinos provide opportunities to improve walkability and transit in diverse regions of the Commonwealth. Transportation and urban design should be addressed from the earliest stages of planning.

Key issues that should be addressed in the planning and impact assessment of each proposed casino are as follows:

- How the arrival and departure of patrons and employees will affect adjacent communities.
- How the siting of the projects, whether in a downtown, semi-urban or rural setting, will affect the ways on which the developments relate physically and operationally to the surrounding community.
- How the developments will meet and optimize their contributions to the recently announced statewide goal of tripling the share of walking, bicycling, and transit travel in Massachusetts. Reducing auto dependence would also reduce the environmental impacts of the developments and help preserve capacity on our highway network. In addition, encouraging greater use of active travel options will help the developments achieve some positive public health effects.

#### **Why is Walking Important?**

People walk as a part of nearly every trip. Access to the casinos will involve significant walking for patrons and staff, whether they arrive by sidewalk, car, bus, rapid transit or some combination of these travel modes. Pedestrian access should be a major consideration in the layout and design of buildings and the connections between the buildings, surrounding streets, transit stops, parking lots and structures.

Casino investments should include good walking, bicycling, and transit connections, including shuttles and other services to and through the sites from surrounding neighborhoods and to nearby destinations such as local restaurants, historic sites or open space resources. Design for pedestrian access should be well coordinated with vehicle access both on and off site.

## **MAKING MASSACHUSETTS MORE WALKABLE**

Walking routes within the buildings should be convenient and pleasant and, as with other large retail complexes such as malls, should provide opportunities for indoor winter walking and sites for new small businesses.

WalkBoston suggests that the following issues be addressed in planning and design for each of the proposals.

**Safe and attractive walking – and where appropriate bicycling – routes within, to and around the development area that include:**

- Wide and unobstructed sidewalks.
- Sufficient lighting for safe travel, using designs that do not spill into nearby residential areas or obscure the night sky.
- Beautiful and environmentally sensitive landscaping that incorporates water run-off controls.
- Intersections that have safe pedestrian crossings, and bicycle travel accommodations on all roads leading to the casino.
- Parking lots designed attractively, with trees, separate walking paths, and permeable surfaces.
- Protection of surrounding communities from through casino traffic.
- Multi-use paths in the surrounding region.
- Weather-protected bicycle parking facilities for staff and patrons.
- Public art on casino property.
- Visually permeable designs with no “blank walls” facing the community.
- A network of short distance walkways to encourage people to walk on site.
- Establishment of a Transportation Demand Management Plan (TDM) with meaningful incentives for both employees and patrons.

**Where appropriate, making the sites open to their host community**

- Design every street that provides access to the development to be welcoming to walkers and cyclists through, among other means, the inclusion of sidewalks or multi-use paths for walkers and cyclists.
- Provide buildings and businesses on site that invite the community, such as cinemas and performing arts venues.

**Increasing transit access with good walking and bicycling connections**

- Locations convenient to existing bus and transit service.
- Safe and attractive walking connections or multi-use paths to transit and bus stops.
- Focus casino’s main entrance on transit (where available).
- Weather-protected bus stops.
- Bus shuttles and traffic-protected multi-use paths or bike routes from regional park-and-ride locations.
- Bike-sharing services at off-site transit and parking sites.
- On-site parking fees to support transit operations and to supplement TDM or transit access.
- Subsidies for regional transit routes, bus management and remote parking to remove as many cars from local thoroughfares as possible.

**Commit to improving walking and transit infrastructure and operations**

- On-site and host community walking and cycling facilities.
- Constructing transit station facilities with connections to on-site walkways and bikeways
- Long-term operation and subsidies of transit, walking, and cycling facilities.
- Longer-distance buses from remote parking facilities. For example, Massport operates remote parking and bus shuttles for access to Logan Airport.
- Late night transit operations to serve patrons and staff, including possibly subsidizing increased transit service that would not otherwise be provided by the MBTA or regional transit authorities.
- Work with host and surrounding communities to diminish impacts on nearby neighborhoods by providing permanent improvements to transportation facilities and operating subsidies to provide community benefits that extend beyond direct access into the casinos.
- Schedule evening and early morning shifts timed to allow staff to use transit, such as 11 PM to 6 AM, when the MBTA is running buses and trains.

**Construction Period**

- The developers should provide a TDM Plan during the construction period to minimize local disruptions. (Deer Island facility's experience could be a model for this.)

We appreciate the opportunity to suggest criteria for use by the Massachusetts Gaming Commission in solicitation of proposals for casino development in the Commonwealth and we hope that these issues will appear in casino proposals since their development will impact the state, its localities and its residents for many years.