



Pennsylvania Gaming Control Board
PO Box 69060
Harrisburg, PA 17106-9060

September 10, 2013

re: Wynn Philadelphia Resort

Dear Board Members:

On behalf of the Central Delaware Advocacy Group (CDAG) – a mission-based coalition of 20 civic and nonprofit organizations – and its constituents within the area of the Central Delaware, I submit the following comments and attached fact sheet.

CDAG recognizes that Philadelphia will host a second Pennsylvania gaming license, and that license may be awarded to a site within the area of the Central Delaware. Wynn Philadelphia Resort is the only license applicant within the area of the Central Delaware. CDAG represents no particular disposition toward gaming and does not oppose, nor does it support, the Wynn Philadelphia Resort proposal.

CDAG advocates for implementation of the planning principles incorporated within Philadelphia's *Master Plan For The Central Delaware*. From that perspective, CDAG urges the Board to consider the following comments and recommendations, all intended to improve Wynn Philadelphia Resort and maximize compatibility with the Master Plan, should the Board award the gaming license to Wynn.

Casino/Hotel Design

- Height of the casino/hotel structure exceeds the recommendations of the Master Plan, and would be more consistent with the Plan, if the height were reduced to not exceed the maximum codified (bonus) height of 225 feet.
- Casino/hotel design is generic to other Wynn resort developments worldwide (identical in appearance to Wynn's Everett, Mass. casino/hotel), is not contextually compatible with the region, and risks appearing anachronistic on site.

Public Access to the Riverfront

- Public access to the riverfront would be greatly improved by continuing the boulevard effect of the main vehicular/patron entrance, circumventing the main casino/hotel structure, and continuing directly to the riverfront recreation area.
- Public access to the riverfront at the southern edge of the site would be improved by both widening the river access path and introducing a landscaped berm to better transition from the single-story parking structure wall to the pedestrian path.



Parking Structure

- The one-story parking structure covers most of the site and is inconsistent with the 40% open area requirements of the district; reducing the footprint of the structured parking area to be more consistent with the open area regulations of the Central Delaware, would be ideal.
- The confining impact on patrons/pedestrians along the perimeter of the parking structure may be mitigated by transitioning from ground level to green roof in the form of a landscaped berm, rendering the parking structure more pedestrian-friendly along the southern and northern edges.
- Treating the east edge roof of the parking structure as an observation deck for patrons would help relieve the impact of the parking structure at the river's edge, increase river related amenities of the plan, and begin the animation of the, otherwise, un-used green roof area.

The Board of CDAG thanks the Pennsylvania Gaming Control Board for its consideration in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Matthew Ruben', written in a cursive style.

Matthew Ruben
Chair, CDAG

- c. Michael A. Nutter, Mayor, City of Philadelphia
Alan Greenberger, Deputy Mayor for Planning and Economic Development
Michael O'Brian, State Representative, 175th District
Lawrence Farnese, State Senator, First senatorial District
Mark Squilla, Councilman, 1st District
Wynn Philadelphia Resort



Wynn Philadelphia Resort Proposal

WHAT IS THE MASTER PLAN?

- Comprehensive broad-stroke planning principles addressing the area from Allegheny Ave. to Oregon Ave., and I-95 to Delaware River
- Formally adopted by Philadelphia the City Planning Commission
- Certain principles codified by a Waterfront Zoning Overlay passed by City Council
- www.delawariverwaterfront.com/planning/masterplan-for-the-central-delaware

WHAT ARE KEY POINTS IN THE PLAN AND THE OVERLAY?

1. Public open spaces approximately every half-mile along the waterfront
2. Waterfront trail for walkers and bikers
3. River Access Streets to connect neighborhoods to the waterfront
4. Height limits and other requirements to ensure human scale and active uses
5. Respects Philadelphia's unique character

DOES THE WYNN PROJECT HAVE TO FOLLOW THESE RULES?

- No; casino zoning (SP-ENT) is exempt from the zoning Overlay
- Yes; the Master Plan does apply, unless a specific alternative master plan is established for the casino site

WHY MEASURE THE CASINO AGAINST THE MASTER PLAN?

- Casino zoning is generic; not specifically designed for the waterfront
- The Plan and Overlay represent what the public wants to see on the waterfront

HOW DOES THE WYNN PROPOSAL MEASURE UP TO THE MASTER PLAN?

1. **Good:** 20 acres of waterfront green space open to the public
2. **Good:** Public paths to the waterfront
3. **Uncertain:** 20 acre parking area. Huge parking structure, but only one story high, and topped by a green roof
4. **Problem:** Building is 300 feet tall. Exceeds Overlay max of 225 by 30%
5. **Problem:** Building design is generic, not site specific
6. **Problem:** Cramped/poor public access on southern edge (Berks St.)