

PHILADELPHIA CITY PLANNING COMMISSION
January 28, 2014

PRESENT: Alan Greenberger, Chairman
 Joseph Syrnick, Vice Chairman
 Manny Citron, representing Richard Negrin
 Bernard Lee, Esq.
 Elizabeth K. Miller
 Saskia Thompson, representing Rob Dubow

ABSENT: Patrick J. Eiding
 Nancy Rogo Trainer
 Nilda Ruiz

Executive Director: Gary J. Jastrzab
Deputy Executive Director: Alan Urek

Chair Alan Greenberger convened the City Planning Commission Meeting of January 28, 2014 at 1:16pm.

Mr. Greenberger announced this is a rescheduled meeting due to the cancellation of last week's meeting because of the inclement weather; and that there will be a small adjustment to the Agenda. We are going to move item #4 to the end of the Agenda. He thanked the commissioners for being here.

- 1) Approval of the Minutes for the December 10, 2013 meeting.

Upon motion by Mr. Citron, the City Planning Commission approved the minutes for the December 10, 2013 meeting.

- 2) Executive Director's Update

Mr. Jastrzab stated he had brief report.

- **STAFF RECOGNITION**

There are two recent changes at the City Planning Commission:

- 1) Larissa Klevan has been promoted to Planner Supervisor (CP4), and is the new Northeast Cluster Leader.
- 2) Alex Smith is a new hire for the Urban Design Division.

- **THE POWER OF THE PLAN SPECIAL EVENT**

Back on January 8, we had The Power of the Plan special event at 2401 Walnut Street with over 200 attendees. It was the 7th CPI graduating class, and we distributed our *Philadelphia2035* calendar for 2014.

- **CIVIL SERVICE EXAM ANNOUNCEMENT FOR CP2**

The City's Office of Human Resources has announced two exams for entry-level positions for City Planner 2 (General) and City Planner 2 (Urban Design Specialty). Application info available on City's OHR web page at < www.phila.gov/personnel//announce/current/index.html> accepted through February 7th.

- **PHILADELPHIA2035 DISTRICT PLAN**

Today we are having presentation on the Draft Plans for the Lower Northeast and Lower North District Plans. We are working on the Lower Northwest District Plan, comprising Roxborough, Manayunk, and Shawmont areas.

REDEVELOPMENT ITEMS RECOMMENDED FOR ADMINISTRATIVE APPROVAL:

None

LEGISLATIVE BILLS RECOMMENDED FOR ADMINISTRATIVE APPROVAL:

1. Property Bill No. 130948 to acquire parcels of land along the Delaware River and the Kensington and Tacony Trail (Introduced by Councilmember Henon on December 12, 2013). Previously we approved the following Bills relating to this item: 120895 in December 2012; 110875 in December 2011; 110429 in May 2011; and several in May 2009.
2. Property Bill No. 130946 to acquire from PAID the property known as 4601 Market Street for a proposed Police Headquarters (Introduced by Councilmember Blackwell on December 12, 2013). This was a proposal on the University Southwest District Plan.

3) Action Item: Amendments to PCPC Regulations.

Mr. Jastrzab stated the proposed amendments deal only with Section 12 – RCOs. It implements provisions of Bill 130657, which passed last Thursday, January 23, 2014. This item before you today have two major changes: 1) *ALL* RCOs must re-register during February; and 2) Issue-based RCOs has been repealed. All RCOs will have to re-register by February 1, 2014. We are accepting those applications at this time. The proposed amendments concern 3 topic areas: qualifying criteria, registration process, notification and meetings.

▪ **QUALIFYING CRITERIA**

- Major change: geographic area of concern/boundaries - limited to 20,000 parcels to keep the neighborhood sized. RCO must actively represent those areas and meetings open to all residents.

▪ **REGISTRATION**

- *ALL* RCOs must re-register with staff for a 2-year term
- Except for initial registration, we will begin new applications and renewal in the month of June. We have an application on the City Planning Commission website.
- Application form (except for Wards, NIDs, SSDs), plus Bill 13057 mandated:
 - Adopted statement of purpose
 - Clear boundaries
 - Clear contact information
 - Identify the location and schedule of public meetings
 - Example of notice for public meetings

▪ **NOTIFICATION AND MEETINGS**

- For all ZBA and CDR cases
 - Philadelphia City Planning Commission will be required to notify applicant within 7 days:
 - ❖ Notice and meeting requirements of the Code
 - ❖ Contact info for RCOs containing applicant's property
 - ❖ Contact info for District Councilmember
 - ❖ We must provide list of addresses that the applicant must notify
 - Selection of Coordinating RCO:
 - ❖ District Councilmember has the first crack to select the first RCO.

- ❖ After 4th day, Philadelphia City Planning Commission selects the designated RCO.
- Applicant notifies RCOs and Others within 10 days
 - ❖ Work with Coordinating RCO to set meeting
 - ❖ Info about the project
 - ❖ Date, time, place of RCO meeting
- Coordinating RCO must document RCO meeting and within 7 days provide "a meeting summary form" to the Philadelphia City Planning Commission documenting any and actions taken at the meeting. Other participating RCOs may also submit a meeting summary form. The form shall be submitted to the Executive Director, the Zoning Board of Adjustment or Civic Design Review Committee (as applicable), and the District Councilmember. Failure to Submit an RCO Meeting Summary Form. The Commission shall notify the Coordinating RCO in writing of its failure to submit an RCO meeting summary form. Three failures by the Coordinating RCO to submit a required meeting summary form during its two-year registration period shall result in the organization's suspension for one year.

Staff had been working very hard notifying RCOs on the new procedures, we have some additional handouts. We will be conducting training sessions for RCOs in this room. We also intend to go out of our way to help RCOs. You have two documents at your places: the first is the stricken document, and the second is the clean document. If the Commission approves these amendments to the Regulations, it goes to the Records Department for a one month public comment. Bill 130657 states these new procedures go in effect on February 1.

Mr. Citron asked about the 20,000 parcels. How is that going to work if the applicant goes over that?

Mr. Jastrzab replied we will work with them on it. We are hoping to create a web application.

Mr. Greenberger stated recommendation is approval.

Upon motion by Mr. Lee, seconded by Mr. Citron, the City Planning Commission approved Amendments to PCPC Regulations.

- 4) Action Item: Zoning Bill 130920 amending the Zoning Code by revising us regulations relating to medical, dental, and health practitioners in certain areas of the City (Introduced by Councilmember Squilla on December 5, 2013).

Martin Gregorski stated this is going to sound familiar because we did one for Councilman O'Neill last November. We are talking about a very large area. It is the staff's opinion this is to stop methadone clinics, and doctors who give out prescriptions. People who do need methadone do so throughout the City. This would stop all new medical, dental, and health practitioner uses. The City Planning Commission staff recommendation is that Bill 130920 not be approved.

Dr. Arthur Evans, Behavior Health and Disability Services for the City's Health Department, stated the City has concerns because people need health care and treatment. Dr. Schwarz has presented maps that show people's health outcome/status by the kind of health care they receive. Base of location – people's health outcome is affected. Methadone Programs – there are parts of the City where we don't have any and other parts where we have thousands. We need to balance them. He has heard people who don't have them, that they will draw people with addictions to these areas. We have people with addictions all over the City. There are parts of the state that would love to have them. There are other parts of Pennsylvania that have people from Philadelphia going to them. That impacts the services and facilities we have in the City.

Mr. Syrnick asked is it your experience that people who have drug problems come from all over the City.

Dr. Evans replied they are all over the City. People who don't get treatment overdose. These programs don't draw people to the community, the people are there.

Lorraine Brill replied our community group has been around since 1948. And she worked at the Frankford Library from 1963 to 1968. There were beautiful stores there, and then a block away they opened a treatment center, which people hang around there and the stores went downhill. She doesn't know about the other neighborhoods in the City. There is one in an industrial center. They go there and they can't hang around, and they can't destroy property. We have a legal agreement that they can't just come in. You need to check who is coming in. Once they have someone who wasn't license. When she looks at this, and they come around homes it is not good. We have a drug problem in the northeast, where they sit on their steps, and kids and others come up to them. The police know it's a problem.

Brian Eury from the Delaware Valley Healthcare Council of HAP testified. (See "Exhibit 4A"). They believe that the current language is far too broad and could potentially impair health care delivery to Philadelphia's neediest residents. They have been in communication with the prime sponsor and the City's Department of Public Health on this Bill, and they look forward to working with them on finding a resolution on this Bill.

Dr. Evans replied the programs' impact on the communities. A majority of the programs are well run and we have guidelines. We are willing to work with the communities. The program that ran in Center City, people didn't know it was there. We are sensitive to the issues that come up, and we are willing to work with the community.

Mr. Greenberger replied the staff feels that this is going to cause a great ripple effect. Anyone that wants to have a doctor's or dentist's office will need to go to the ZBA. People think they will be all right. This may not be all right. They may not get a variance. You are asking them to go through a time consuming process. We are going to try, with Dr. Evans and his staff, to come up with management of the issues. We have looked at the maps and seen where the clinics are – they are all over the City. The more they are aggregated in one place; there will be more problems. And it is a Federal Law that will cause a Federal lawsuit because of it.

Upon motion by Ms. Thompson, seconded by Mr. Citron, the City Planning Commission approved staff's recommendation to not approve Zoning Bill 130920.

- 5) Disposition of JFK Plaza/Love Park Parking Garage at 15th and Arch Streets (Introduced by councilmember Greenlee for Council President Clarke on December 5, 2013):
 - a. Action Item: Property Bill 130901 to enter into a Declaration of Rights, Easements, Covenants, and Restrictions to govern the relationship among JFK Plaza, the Love Park Parking Garage, and land around and beneath the Love Park Parking Garage.
 - b. Action Item: Property Bill 130902 to convey the Love Park Parking Garage, together with certain rights and obligations of the owner specified by the foregoing Declaration of Rights, Easements, Covenants, and Restrictions.

Ms. Gregorski stated this is for the garage under Love Park. The Love Park Parking Garage is located below grade, in the area bounded by 15th and 16th Streets, JFK Boulevard, and Arch Street. Bill 130902 allows it to be sold. It authorized the Commissioner of Public Property to sell the garage located under JFK Plaza/Love Park to InterPark Holdings, who will continue to operate the garage for public parking. In order for the City to convey the garage while retaining title to the land above, below, and around it, the City must record a Declaration of Rights, Easements, Covenants, and Restrictions applicable to the site. This will create three separate parcels of real estate (the garage itself, the land above it, and the land beneath it) and the easements necessary for the intended uses of each of these parcels. The Declaration will also describe the rights, responsibilities, and restrictions of the owner of the three parcels. Bill 130901 is for the easements and the City retains the streets. It authorizes the City to enter into a Declaration of Rights, Easements, Covenants, and Restrictions to govern the relationship for the surface area of JFK Plaza/Love Park, the Love Park Parking Garage, and land around the beneath the Love Park Parking Garage. The City-owned public parking garage contains 820 spaces. Vehicular access to the garage exists on both Arch and Cherry Streets. Pedestrians can access the garage through stairwells located on 15th and 16th Streets, and via the Suburban Station Concourse. The sale price is \$29,600,000. The money will go into the General Fund, but the money hasn't been decided for what use. In the Capital Program for Love Park improvements, \$16.5 million has been allocated. The City Planning Commission staff recommendation is for approval.

Mr. Greenberger replied Mike DiBerardinis is working with Council on how to design and pay for the above grade.

Mr. Lee asked are there going to be restaurants.

Mr. Greenberger replied we are looking to see what we can do.

Ms. Brill replied it is JFK Plaza not Love Park. The plan Darrell Clarke wants to put there with restaurants, it will take away the green space. It will not be a place where people will be able to sit there and eat their lunches. The underground parking is filled up with City workers. If you sell it to someone else, then the price will go up. You can't find a parking lot that doesn't cost you a lot of money. You are not thinking of the people who are parking there.

Mr. Greenberger replied this action has nothing to do with Park design.

Upon motion by Mr. Lee, seconded by Mr. Citron, the City Planning Commission approved staff's recommendation to approve Property Bills 130901 and 130902.

- 6) Action Item: Streets Bill 130950 authorizing the Department of Licenses and Inspections to license pedestrian plazas, parklets, and bike corrals on City streets with the approval of the Streets Department (Introduced by Councilmember Squilla on December 12, 2013).

Sarah Chiu stated this Bill amends the Philadelphia Code to provide for the authorization of certain pedestrian enhancements to occupy, by license, a portion of the right-of-way, all under certain terms and conditions. The Department of Licenses and Inspections, upon recommendation of the Department of Streets, is authorized to issue pedestrian enhancement licenses allowing construction and maintenance of pedestrian enhancements in the right-of-way, subject to the requirements of this Chapter. Pedestrian Enhancements include the following: pedestrian plazas, parklets and bike corrals. All three types of encroachments are to be located in cartway of the street, or in an existing parking lane. Currently, the pedestrian enhancement proposals are handled by applying temporary lane closure permits from Streets Department. No community input in it. The process of obtaining the pedestrian enhancement license involves: 1) file application with MOTU; 2) property owner and neighborhood support – they sign off; and 3) license application reviewed and approved by the Streets Department. The City Planning Commission staff recommendation is approval.

Mr. Greenberger asked is this is to put some level of organization to it.

Ms. Chiu replied yes and staff feels this is close to our 2035 Plan.

Ms. Miller asked is MOTU on board.

Ms. Chiu replied yes.

Mr. Lee asked who asked for it. Who maintains it?

Ms. Chiu replied the tenants.

Ms. Miller replied like the Reading Terminal – there is a manager.

Ms. Chiu replied like University City.

Mr. Citron asked how long is the license issued for.

Ms. Chiu replied it didn't specify. You can be there until they tell you.

Upon motion by Ms. Thompson, seconded by Ms. Miller, the City Planning Commission approved staff's recommendation to not approve Streets Bill 130950.

- 7) Staff Presentation: DRAFT *Philadelphia2035* District Plans:
 - a. Central Northeast District Plan
 - b. Lower North District Plan

Michael Thompson stated this is the draft for the Philadelphia2035 Central Northeast District Plan. The public comment period for the draft of this plan will remain open until February 28, 2014. You can get a copy of the plan at Phila2035.org. The Steering committee has 37 members. We have had over 200 people attend the meetings. The Central Northeast district is generally bounded by Roosevelt Boulevard, the Pennypack Creek Park, the Montgomery County Line and Knorr and Unruh Streets. The Central Northeast District communities include the upper portions of the Lawndale, Upper Northwood, and Castor Gardens, as well as the Lexington, Rhawnhurst, Burholme, Fox Chase and Bells Corner neighborhoods. There are 78,000 people here. It is 10 miles from Center City. This area has 88% of the housing units built before 1989. Population growth neither district widely or evenly distributed. Major reason for it is the increase or decrease in households. The three largest employers are health care. The majority of the population use vehicles, and 13% use mass transit. There are 3 focus areas: 1) Cottman Avenue and Roosevelt Boulevard – retail space, good public transit, public library and clinics. The problems are safety and the sidewalks are not pedestrian friendly. 2) Foxchase Town Center– retail space located on 3 main streets Oxford, Rahwn, and Rockwell Avenues, Fox Chase train station with surface parking, and town center. Recommendations are developing a better walkway and new parking garage on Rockwell Avenue with retail on the first floor. 3) Five Points – it is a distinctive historic area with Honor Square War Memorial on Center with retail spaces, supermarket, Ryers Transit Station near Ryers Museum and the Foxchase Cancer Center. The greater Five Points area can be strengthened as a neighborhood center through zoning and urban design that encourages development that builds to the street line. Enhancing the pedestrian connections between the rail station, bus stops, and the commercial corridors will help transform the core blocks of Cottman, Rising Sun, and Oxford Avenues into a more desirable place to spend time and money. Public realm improvements to Honor Square will complement other proposed streetscape improvements. Recommendations under Thrive – strengthening Cottman and Roosevelt Boulevard; Connect – implement DVRPC for Roosevelt Boulevard study – emphasizing and enhancing architecture along the corridor. There is a 1% vacancy rate in the District. Most zoning will remain the same. There will be minor corrective zoning to advance the plan. Public comments until February 28, 2014 – you can send him or text him your comments.

Mr. Greenberger asked if there has been a survey on public facilities especially for the age groups.

Mr. Thompson replied they haven't done a demographic analysis on it.

Lorraine Brill replied there are a lot of things that don't make sense. People went up to New York and told the Chinese that it was cheaper to buy in Philadelphia. She feels he really needs to meet with the community groups, especially Rhawnhurst, which is near a parking garage for Foxchase on Rockwell Avenue.

Mr. Thompson replied behind the storage center.

Ms. Brill replied on Rockwell Street, they make things you couldn't get anywhere else. You don't want to get rid of them. She thinks he should talk to the people there.

Robert Rudnitsky, Zoning Chair for Castor Gardens, replied they are certainly in favor of competitive area. He works with a lot of property owners in the area. As for the 8% increase, we are having a difficult time finding quality applicants. Putting in a tremendous amount of mixed-use zoning, could increase the number of apartments in the area. There are strong

amount of people renting out to people they don't want to rent to. We are concerned about putting in rental units.

Ms. Jean Gavin, resident of Foxchase, replied what's missing is Rhawn Avenue and Foxchase, 17600 on Oxford Avenue, and 500 Hartel Avenue that whole area.

Mr. Thompson replied that area is recommended for sidewalk improvements.

Ms. Gavin replied she didn't see it at the last meeting. The other thing she is concerned with is parking at the train station. There is land behind the Twins Auto Body, she talked to the owner and he is willing to sell the land. He hasn't spoken to SEPTA or the City. If they are building a garage on a parking lot that is already there, they still need parking spaces.

David Fecteau states this is a presentation of the draft Lower North District Plan. He thanked his team: Paula Brumbelow, Jack Conviser, Octavia Howell, Larissa Klevan, Pauline Loughlin, Clint Randall, and Matt Wysong. There are 10 priority and 30 or so recommendations. The public comment is open until February 28, 2014, and final approval will be in March. The area consists of middle class and working class homeowners. There were over 300 attendees at the meetings. This area has a slower growing population; the school age population is dropping. The presentation will focus on priority recommendations. The full draft will be released to the public after the Commission presentation. Staff is not requesting action from the Commission following today's present. This plan will apply the goals and strategies from the Citywide Vision to a smaller area bounded generally by Girard Avenue, Lehigh Avenue, Front Street, and the Schuylkill River. Lower North's population is slowly growing. Jobs exist, mostly in medicine, education, and restaurants and fast food. Over the last ten years, high-skilled jobs have been replaced by lower-skilled jobs. A significant amount, 60 percent, of the population does not have access to a vehicle, so maintaining a robust public transit system is essential. There are 16 bus lines, Market/Frankford Line, and the Girard Street trolley. The Lower North team developed ten priority recommendations under the categories Thrive, Connect and Renew. Thrive focuses primarily on housing and economic development. Connect deals with transportation. Renew addresses parks, recreation and historic preservation. The priorities follow:

Thrive

- 1) Preserve blocks of single family homes with high rates of homeownership;
- 2) Commission a study to determine what impacts, if any, rising property values have on current renters and homeowners;
- 3) Encourage business and job growth on the Germantown and Lehigh commercial corridor (The Commerce Department has spent a lot of money in this area);
- 4) Install priority signal controls at Fire Engine 34, Fire Engine 45, Fire Engine 2 and Fire Engine 27.

Connect

- 5) Implement infrastructure changes along high-volume bus routes 7, 32, and 48;
- 6) Improve and expand Route 15 trolley service;
- 7) Implement priority recommendations from Pedestrian and Bike Plan.

Renew

- 8) Construct a New Martin Luther King Older Adult Center at 21st Street and Cecil B. Moore Avenue;
- 9) Bring the Cecil B Moore Recreation Center into a state of good repair. We don't

- have the money to improve all of the Rec Centers;
- 10) Pursue nomination for the following sites to the Philadelphia Register of Historic Places:
- The Pyramid Club
 - Diamond Theater
 - Church of the GESU
 - Poth Brewery
 - 1416-32 W Girard Avenue

The Focus Areas are:

American Street and vicinity: The focus area near American and Master assumes that industrial will continue to develop on American Street north of Master. Land on either side of American Street that is zoned for industry will be allowed to transition into residential, commercial or a residential and commercial mix.

Ridge Avenue: The focus area near Ridge and Oxford assumes that the Philadelphia Housing Authority's redevelopment of the to be demolished Blumberg public housing high-rises will lead to market-rate development and reintroduced 23rd Street. The existing commercial node at Ridge and Cecil B Moore Avenue would be maintained, but the remainder of Ridge from Girard to Cecil B Moore would be allowed to transition to a mix of purely residential, and larger format retail with residential above. We want to see some type of green space in the area.

Focus Topic:

A City Council bill introduced in 2013 proposed to create development districts where properties would be offered at a discount to interested developers. Census Tracts with substantial concentrations of vacant, tax delinquent or City owned land would be designated as development districts. Noted there are 7 areas within 5th and 7th Districts. In Strawberry Mansion – residential stabilization; down zone to single-family; and North Central around Temole – multi-family in that ring, but we want to down zone around that ring to single-family. Sharswood – there is City owned land that is ripe for development. The impact of this incentive would be maximized by limiting it to small concentrated areas that are strategically chosen by the City. The City Planning Commission identified seven areas in Lower North that would align with the spirit of the original bill. These 'hot spots' were mapped based on overlaps of the three factors in the bill, and interventions were selected based upon the City's ability to act. We will be putting a copy of the printed draft in the Public Library.

Mr. Greenberger replied some analysis of public facility and benchmark then as the City as a whole.

Mr. Lee replied he knows the Land Bank is new. Are you working on it?

Mr. Fecteau replied we have staff who are working on it. Jametta Johnson and Larissa Klevan are working on it with Alan Urek. This has been done with the thought of the Land Bank.

Ms. Miller replied single-family with the thought of affordable housing.

Mr. Fecteau replied a lot of it has been happening. South of Oxford Street at the APM area. It is not to say that we can't download or upload a certain area. When we put these zoning areas out there, City Council has to be interested in doing it.

Mr. Greenberger asked have you broached this down zoning with the community.

Mr. Fecteau replied we have done this at the last meetings. We have done a land use study in the area.

Mr. Greenberger asked the public land, is that really viable going forward as industry.

Mr. Fecteau no, not really.

Mr. Greenberger replied even if we think it is a speculative venture, we should label it.

Gabriel Gottlieb, Real Estate Agent, felt that the demand for multi-family is not robust. He felt the demand and population is under estimated. You have students and artists moving in. You can anticipate great population in this area. He thinks the demand is greater for housing and multi-housing. He encouraged the City Planning Commission and PIDC to consider the vacant land on American Street for transition for creative uses. Railroad line along Glenwood Avenue, about 31st and Glenwood, residential and a couple of properties up there could be potential for train station there. The railroad is a detriment there because it doesn't stop.

Mr. Greenberger adjourned the City Planning Commission Meeting of January 28, 2014 at 3:10pm.

SUMMARY

1. Approval of the Minutes for the December 10, 2013 meeting. Approved
2. Executive Director's Update.
3. Action Item: Amendments to PCPC Regulations (Presented by Gary Jastrzab) Approved
4. Action Item: Zoning Bill 130920 amending the Zoning Code by revising use regulations relating to medical, dental, and health practitioners in certain areas of the City (Introduced by Councilmember Squilla on December 5, 2013; Presented by Martin Gregorski). Not be approved
5. Disposition of JFK Plaza/Love Park Parking Garage at 15th and Arch Streets (Introduced by Councilmember Greenlee for Council President Clarke on December 5, 2013; Presented by Martin Gregorski).
 - a. Action Item: Property Bill 130901 to enter into a Declaration of Rights, Easements, Covenants, and Restrictions to govern the relationship among JFK Plaza, the Love Park Parking Garage, and land around and beneath the Love Park Parking Garage. Approved
 - b. Action Item: Property Bill 130902 to convey the Love Park Parking Garage, together with certain rights and obligations of the owner specified by the foregoing Declaration of Rights, Easements, Covenants, and Restrictions. Approved
6. Action Item: Streets Bill 130950 authorizing the Department of Licenses and Inspections to license pedestrian plazas, parklets, and bike corrals on City streets with the approval of the Streets Department (Introduced by Councilmember Squilla on December 12, 2013; Presented by Sarah Chiu). Approved
7. Staff Presentation: DRAFT *Philadelphia2035* District Plans:
 - a. Central Northeast District Plan (Presented by Michael Thompson)
 - b. Lower North District Plan (Presented by David Fecteau)

"EXHIBIT 4A"



DELAWARE VALLEY HEALTHCARE COUNCIL
of The Hospital & Healthsystem Association of Pennsylvania

Good Afternoon Honorable Commissioners,

I am Brian Eury, Regional Director for the Delaware Valley Healthcare Council of HAP (DVHC). DVHC advocates for southeastern Pennsylvania hospital and health care-related organizations, including more than 50 acute and specialty care hospitals and health systems, 30 facilities providing inpatient behavioral health services, and 20 facilities providing rehabilitation.

DVHC appreciates the opportunity to express our members' concerns with Bill Number 130920.

The practice of delivering quality health care continues to evolve. Our members have been diligent about providing that delivery through every facet of our communities' needs. Emergency rooms, inpatient, and outpatient facilities continue to feel the stress of being safety net organizations here in Philadelphia.

Patients have begun to demand flexibility in how we treat them. Whether health care is achieved through the entities mentioned above or in their homes and neighborhoods, Bill Number 130920, as it is currently written, severely impacts that flexibility by adding an additional zoning variance on available office space

While we understand and appreciate the underlying issues of this legislation, DVHC believes that the current language is far too broad and could potentially impair health care delivery to Philadelphia's neediest residents.

DVHC has been in communication with the prime sponsor and the City's Department of Public Health on this bill, and we look forward to working with them on finding a resolution on this bill.

Thank you.

