

Redevelopment Plan
for
Germantown Veterans Memorial USARC
5200 Wissahickon Avenue
Philadelphia, Pennsylvania

July 2007



Submitted by the Philadelphia City Planning Commission,
serving as the Local Redevelopment Authority for the 2005
round of the Base Realignment and Closure (BRAC) program.

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Introduction

The United States Department of Defense (DOD) declared the Germantown Veterans Memorial United States Army Reserve Center (USARC) at 5200 Wissahickon Avenue surplus Federal property during the 2005 round of the Base Realignment and Closure (BRAC) program. Under Federal BRAC regulations, the Germantown Veterans Memorial USARC must close on or before September 2011.

The DOD and the Philadelphia City Council have designated the Philadelphia City Planning Commission (PCPC) as the Local Redevelopment Authority (LRA). As the LRA, the PCPC is charged with building consensus around a facility redevelopment plan that balances citywide and community needs and serves as a guide for environmental analysis and property disposition by the DOD.

The specific responsibilities of the LRA include: public outreach; solicitation of Notices of Interest (NOIs) from interested parties, including homeless services providers; consideration of NOIs in the preparation of reuse plans; and the development of a redevelopment plan for approval by the DOD, the United States Department of Housing and Urban Development (HUD), and other Federal departments that may sponsor public benefit conveyances, and the Philadelphia City Council.

The PCPC applied an inclusive community planning process to formulate shared goals and objectives in support of this draft redevelopment plan for the Germantown Veterans Memorial USARC. Community meetings were held to review NOI submissions culminating in a presentation of this draft redevelopment plan at a public meeting of the affected communities on May 29, 2007. This draft redevelopment plan was approved for submission to the DOD and HUD by the Philadelphia City Planning Commission on July 17, 2007.

This draft redevelopment plan provides a framework for building consensus around a preferred redevelopment of the facility. It includes information on existing conditions, a description of community context, NOI submissions analysis, and recommendations.

Goals

In its role as the Local Redevelopment Authority, the Planning Commission has several goals for the redevelopment of BRAC sites:

- The redevelopment plan should be environmentally sound;
- The redevelopment should be realistic, feasible, economically, and fiscally positive;
- The redevelopment should be socially responsible and fitting with the community context;
- The redevelopment plan should be compatible with citywide and neighborhood plans;
- The redevelopment plan should have broad community support.

Existing Conditions

Site Location

The Germantown Veterans Memorial USARC is located on approximately 5 acres of land at 5200 Wissahickon Avenue within the northwest section of Philadelphia, Pennsylvania (a City of the first class). The surrounding neighborhoods, East Falls and Southwest Germantown, are fully developed and stable. The Germantown Veterans Memorial USARC is buffered from nearby residential neighborhoods by the R8 SEPTA regional rail line to the west and north, Wissahickon Avenue to the east, and the Federal GSA/Veterans Administration office complex to the south. The site is zoned entirely residential (R-9-A) and is adjacent to mixed zoning classifications including single-family residential, commercial, and general industrial. The broader study area, bounded by the Wissahickon Creek Park to the north, Germantown Avenue to the east, the Roosevelt Extension (US Route 1) to the south, and Henry Avenue to the west is primarily residential with some institutional and recreational uses.

Below are listed the elected officials and their political jurisdictions that affect the site:

4th City Council District, Carol Ann Campbell
8th City Council District, Donna Reed Miller
7th District Pennsylvania Senate, Vincent Hughes
3rd District Pennsylvania Senate, Rosita Youngblood
197th District Pennsylvania Representative, Jewell Williams
198th District Pennsylvania Representative, Shirley Kitchen
U.S. 2nd Congressional District, Chaka Fattah

Site Conditions

The current occupying units of the Germantown Veterans Memorial USARC are the Army's 223rd Quartermaster Company and 3/317 Battalion (BCT), 80th Division. These units will vacate the facility on or before September 2011 when the construction of a new facility in Willow Grove, PA is completed. Over the past 50 years the USARC has been used primarily for the Army's logistical, educational, and administrative purposes. The center is located on 4.94 acres and has two buildings, the main training building (30,538 sq. ft.) and the organizational maintenance shop (6,300 sq. ft.). The remainder of the site is paved parking (11,248 sq. yd.) and some open space consisting of lawn and trees. An approximately 10 foot high retaining wall separates the facility from the GSA/Veteran's Administration office property to the south.

Both buildings were erected on concrete pads and constructed of concrete block with a brick veneer. The main training building is two-stories in height and includes classrooms, offices, a drill room, lockers, and storage areas. The one-story organizational maintenance shop is used mostly for storage, but has five vehicle-maintenance bays. The maintenance bays are no longer used for heavy maintenance since there is no appropriate drainage system to handle vehicular wastewater such as floor drains or

operable wash racks which would contain and treat contaminated wastewater from military vehicle maintenance and cleaning. Use of the bays and wash racks was discontinued in the 1990s due to environmental concerns regarding nearby surface water contamination. The site is serviced by electricity, gas, water, and sanitary sewer.

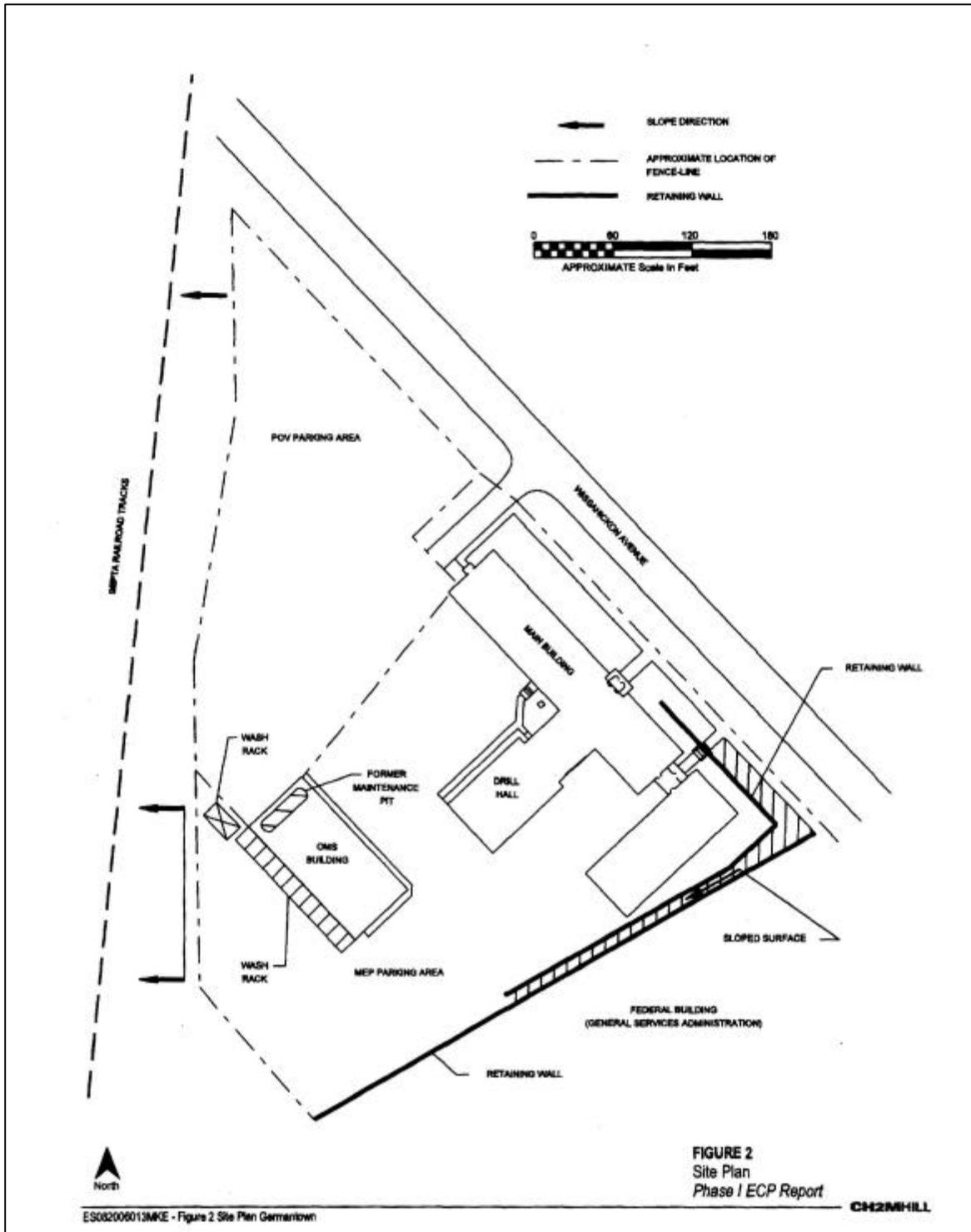
The U. S. government purchased the parcel of land in 1955 and the two existing structures were constructed in 1957. Prior to the federal government's acquisition of the site, the ownership of the property is unclear. However, from aerial photographs and property atlases, it appears that the site was undeveloped and the location of a baseball diamond in the decade prior to the construction of the Germantown Veterans Memorial USARC.



View of the main training building from Wissahickon Avenue (left) and the organizational maintenance shop to the rear of the property.

Environmental

The site has some issues related to elevation and possible landfill. There has been an ongoing issue with sinkholes in the parking lot behind the organizational maintenance shop and near the retaining wall. This is most likely an issue caused by landfill of the property. The site is generally flat until a sharp elevation decline at the SEPTA train tracks along the western edge of the property. However, the site is located at the base of a hill to the east of the property. Stormwater that runs down the hill via Hansberry Street collects along the eastern edge of the property beside Wissahickon Avenue. Because there are no sidewalks along Wissahickon Avenue for half of the property's length, the stormwater ponding makes it even more difficult for pedestrians to walk past the property. Pedestrians often walk in the street to avoid the frequent on-site flooding.



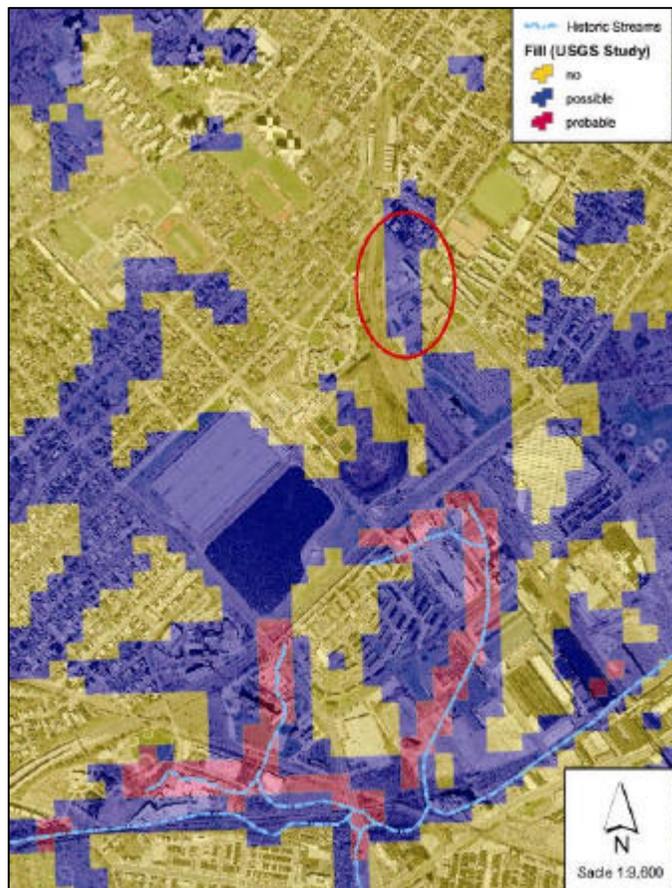
Site plan of the Germantown Veterans Memorial USARC.

The Environmental Condition of Property Report for the Germantown Veterans Memorial USARC was prepared on behalf of the DOD by CH2M Hill, an engineering, construction, and operations services consulting firm, in February 2007. Based on review of this report and its supporting documentation, the LRA has determined that the existing environmental issues are limited to stormwater control, flooding, sinkholes, and the vehicle washing areas.

The “at” or “below-grade” infrastructure, in particular the on-site stormwater systems, are suspect due to the presence of sinkholes identified in the parking lot and frequent on-site flooding. The lack of an operable storm water management system needs to be addressed. The LRA supports actions that would correct or mitigate the cause of the sinkholes and on-site flooding in order to prevent a recurrence of the problem. A storm water management plan for this five-acre site will need to be submitted for review and approval by the Philadelphia City Planning Commission as well as the Philadelphia Water Department. This office suggests involvement with the Philadelphia Water Department, Office of Watersheds Department to develop and implement corrective actions.

The Environmental Condition of Property Report identified several other environmental conditions of concern including former underground storage tanks, leaking underground storage tanks located within a quarter-mile of the site, and the on-site vehicle washing areas. Hazardous materials storage and asbestos contamination were not cited in the report as areas of concern at the facility.

After removal of the two on-site underground fuel oil tanks was completed in December 1992, monitoring wells were installed as part of the tank closure requirements to reach a complete tank closure response. After ten years of ground water monitoring, the Pennsylvania Department of Environmental Protection issued a “no further action” letter in 2002. The LRA, in review of the Germantown Veterans Memorial USARC has



This U.S. Geological Society map shows possible fill areas surrounding the Germantown USARC; the center's site is circled in red.

deemed that both former on-site and off-site underground storage tanks do not negatively affect the redevelopment of the Germantown Veterans Memorial USARC.

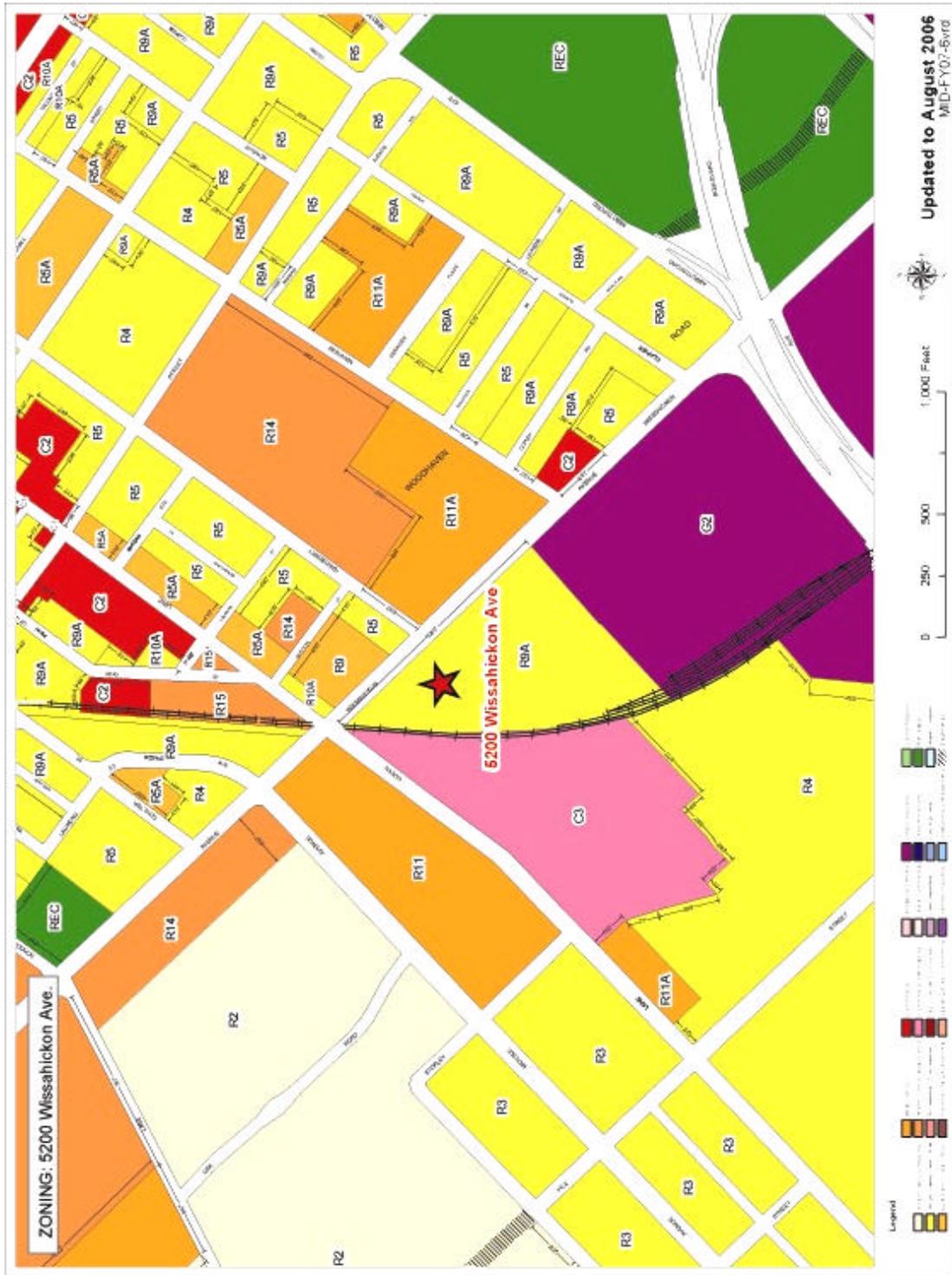
As the LRA, the PCPC recommends that the vehicle washing and maintenance area, in particular the wash rack locations, not be continued as a part of the redevelopment of the USARC. The existing wash racks that contained and treated vehicle maintenance wastewater including petroleum products, antifreeze, battery acid, and solvents, are no longer operable. Without operable wash racks, vehicle maintenance wastewater will either escape to nearby landscaped areas possibly affecting plant-life and groundwater, or drain into nearby stormwater inlets.

The DOD has classified the Germantown Veterans Memorial USARC as a “Type 3” property. Type 3 properties are “an area or parcel of real property where release, disposal, or mitigation, or some combination thereof, of hazardous substances has occurred, but at concentrations that do not require a removal or remedial action.”

Zoning

The site is currently zoned R9A, a residential classification allowing attached single-family dwellings. The current Army Reserve use is not permitted in the zone. The current land use is compatible with its existing neighbors (a medical complex, an office building, and homes across Wissahickon Avenue) as it has a fairly low traffic impact, produces no deleterious odors or noises, and provides employment to the area. Most of the neighboring GSA/Veterans Administration site is currently zoned G-2, a general industrial classification, even though it is an office use. A small portion of the site is zoned R-9A. C-3 commercial zoning would better reflect the land use of the GSA/Veterans Administration site.

In Philadelphia, many institutions such as schools and churches are given residential zoning classifications that are consistent with nearby residential zoning. This is the reason for the R9A residential zoning at 5200 Wissahickon Avenue. Despite the existing zoning, single-family residential development is not recommended because of the irregular shape of the parcel, concerns about below-grade infrastructure, the proximity of the R8 line, and the adjacent medical and office uses. See the “Community Context” and “Recommendations” sections of this report for more information.



The majority the land nearby the Germantown Veterans Memorial USARC site is zoned residential. The adjacent office uses, the GA/Veterans Administration and the Drexel University Medical Office are zoned G2 and C3 respectively.

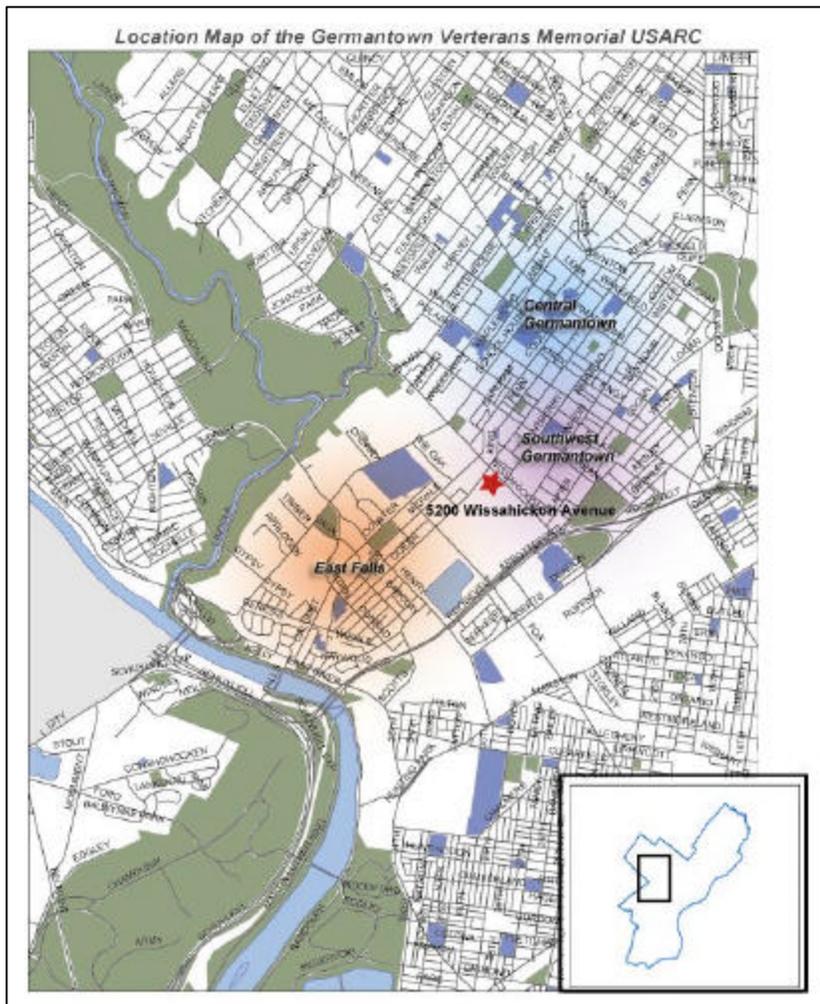
Neighborhood Description

The Germantown Veterans Memorial USARC lies between two neighborhoods, East Falls lying to the west and Southwest Germantown to the east. Wissahickon Avenue is generally seen as the boundary between East Falls and Southwest Germantown. Wissahickon Avenue is typified by large landholders which provide a natural boundary between the two neighborhoods. Those large landholders include Drexel University, the GSA/Veterans Administration, Germantown Cricket Club, and several large apartment complexes including Alden Park.

The immediate East Falls neighborhood is typified by single family detached stone houses mostly built in the 1910s and 20s. Southwest Germantown has a tighter street grid than East Falls, and two and three-story rowhomes and twins are the typical housing style. Southwest Germantown was developed in the late 19th and early 20th centuries. Both neighborhoods have excellent housing stock that is large, well-constructed, and architecturally interesting.

East Falls is generally more affluent and less diverse than Southwest Germantown. East Falls is experiencing rejuvenation and investment along its commercial corridor, Ridge Avenue. This has aided in the stabilization of the neighborhood. Southwest Germantown has been experiencing issues with housing vacancy, single-family housing conversion to multi-family, economic disinvestment, and crime.

Southwest Germantown's commercial corridors are Germantown and Wayne Avenues. Both Germantown Avenue and Ridge Avenue provide neighborhood



The Germantown Veterans Memorial USARC lies between the East Falls and Germantown neighborhoods in Northwest Philadelphia.

retail services to their respective neighborhoods. Neither community is currently home to regional retail destinations or is a major center of employment. The majority of shopping and employment opportunities for local residents are located in Center City Philadelphia or suburban office areas such as King of Prussia /Great Valley, Plymouth Meeting, Conshohocken, or Fort Washington/Willow Grove. There has been no new major development in either neighborhood in the past decade. The majority of commuters in this area drive to work with less than 30% walking or taking mass transit.

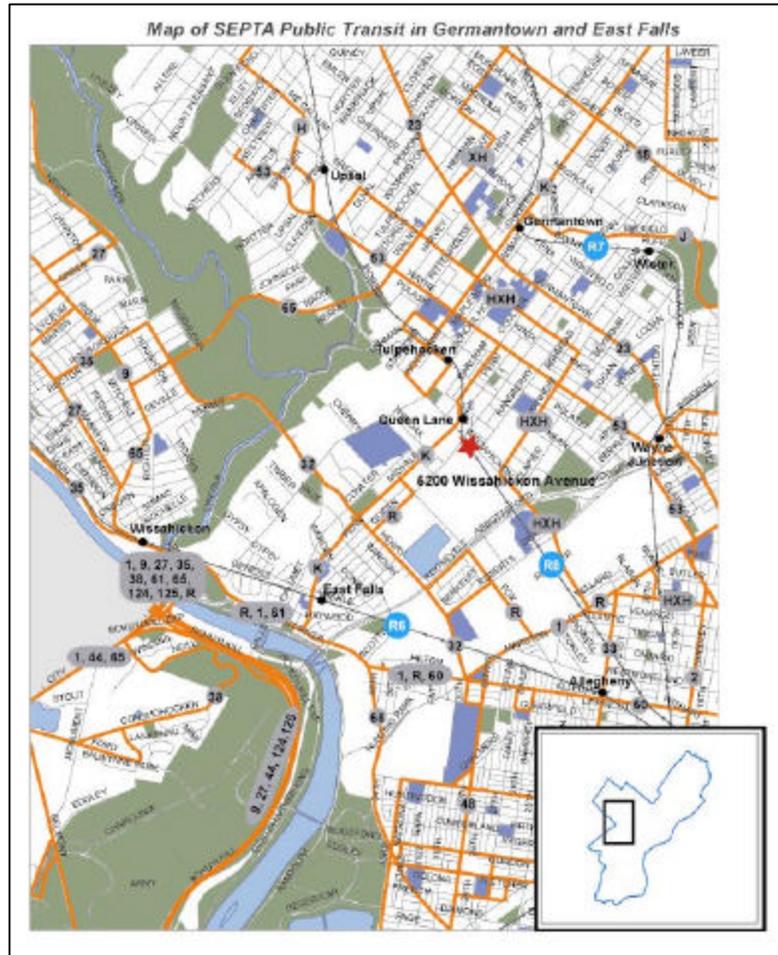
Active and well-organized community groups represent both neighborhoods. The East Falls Community Council and the East Falls Development Corporation represent East Falls. The Southwest Germantown Neighbors Association is the community group that services Southwest Germantown. These organizations often work closely together, as they have for the Base Realignment and Closure process for the Germantown Veterans Memorial USARC.

The broader study area for the Germantown Veterans Memorial USARC, bounded by the Wissahickon Creek Park to the north, Germantown Avenue to the east, the Roosevelt Extension (US Route 1) to the south, and Henry Avenue to the west, is primarily residential with some institutional and recreational uses. There were 72 real estate sales in 2005 and the median sales price was approximately \$150,000. The data profile below shows demographics for the broader study area (census tracts 206, 208, 240, and 243) as of the 2000 Census.

Data Profile for the Germantown Veterans Memorial USARC Major Impact Area	
Total Population	11,945
Asian	3.4%
White	29.3%
Black	63.7%
Hispanic	2.3%
Median Household Income	\$32,106
Poverty Level	23.8%
Total Housing Units	6,385
Occupied	81.2%
Vacant	18.8%
Rental	59%
Owner-Occupied	41%

Vehicular access to the Germantown Veterans Memorial USARC is provided along Wissahickon Avenue. Wissahickon Avenue is a major two-way street that provides access to major office (Veterans Administration), medical (Drexel University Queen Lane Medical Campus), and recreational uses (Germantown Cricket Club) within two blocks of the center. Access to the Roosevelt Extension (U.S. Route 1) and the Schuylkill Expressway (I-76) is nearby and direct.

The site is also well serviced by public transit. The SEPTA R8 regional rail line runs directly behind the site and the nearest R8 station, Queen Lane, is located one block north at Wissahickon Avenue and Queen Lane. Weekday rush hour service headways for the R8 Chestnut Hill West are every 25 to 30 minutes. SEPTA bus routes XHX and J also serve the site. Buses run approximately every 20 minutes during the weekday rush hour periods. However, no bus service runs directly along Wissahickon Avenue.



Community Context

The Germantown Veterans Memorial USARC is located on Wissahickon Avenue, the boundary between East Falls and Southwest Germantown neighborhoods. As discussed previously in this report, the large institutional, residential, and recreational landholders that line Wissahickon Avenue's busy two-way roadway create a natural buffer between these two residential neighborhoods. Because of the site's location between Wissahickon Avenue and active commuter rail tracks, a change in the land use of this site will most likely have little impact on the surrounding communities.

The site's current land use is not in conflict with the surrounding communities or neighboring land uses. An industrial use for the site would be inappropriate and opposed by the community. Commercial uses are not generally found along Wissahickon Avenue

and would be inappropriate, as city policies stress commercial reinvestment in existing commercial corridors. Land uses such as recreation or institutional, including offices, schools, or other public facilities, would be appropriate for the site considering the existing neighboring uses. Single-family residential development of the site would be difficult given the odd shape of the parcel. Low-rise multi-family housing could be accommodated at the site. However, the community, especially Southwest Germantown, may be wary of a homeless support facility being located at this site. This neighborhood has experienced an influx of such support facilities in recent years.

Currently the Germantown Veterans Memorial USARC is used two weekends a month when approximately 100 U.S. Army reservists are trained. Reservists come from throughout the Philadelphia region to the center. The center provides no full-time employment. As the facility is currently operated, it is not integral to the surrounding neighborhoods' economy or culture.

The existing public transportation services and road network are adequate to support a variety of redevelopment options. However, there are issues regarding internal vehicular circulation and pedestrian access to the site because of the runoff and sinkhole issues discussed previously. To improve vehicular and pedestrian access both to and within the site, any redevelopment of Germantown Veterans Memorial USARC must remediate the sinkholes, reduce impervious surface to improve flooding issues, construct sidewalks along the entire length of the property, and implement stormwater detention systems on site. Improved landscaping buffering the edge of the parking lot should also be an essential part of any development plan for the site.



This aerial shows the Germantown Veterans Memorial USARC in relation to surrounding land uses, as well as the lack of continuous sidewalks.

Community Outreach

The Philadelphia City Planning Commission, as the LRA, conducted substantial public outreach. (see **Attachment A**). During the planning phase, the PCPC/LRA worked with the immediately impacted communities through the Southwest Germantown Neighbors Association (SGNA), East Falls Community Council, and the East Falls Development Corporation. Two joint meetings of the three groups were held to inform the public of the BRAC process and gauge community sentiment. Members of the Planning Commission staff attended and participated in both meetings.

The first community meeting was held on February 27, 2007. At this meeting four applicants that submitted qualified notices of interest (NOIs) presented proposals for redevelopment of the Army Reserve Center at 5200 Wissahickon Avenue. Community representatives respectfully listened to all proposals. Comments included: 24-hour care and security concerns about the 1260 HDC proposal; concerns about Eagle's Nest financial capacity, and; concerns about the reuse of the existing Randolph Career Academy site on Henry Avenue if the School District were to relocate the school to the Wissahickon Avenue site. Also at this meeting, the communities requested, and applicants agreed, to construct sidewalks, remediate stormwater issues, and provide additional landscaping. (The submissions are described on pages 13 to 17.)

A follow-up meeting was held with the community groups on March 19, 2007. There, members of the Planning Commission staff summarized the four proposals and answered questions from area residents. East Falls subsequently sent a letter to the PCPC/LRA stating that the Department of Public Property was the neighborhood's overwhelming choice. Southwest Germantown Neighbors Association similarly reported that an email survey conducted by the group showed a clear preference for the Police reuse.

Planning Advisory Committee (PAC) meetings were also held on January 26, 2007 and April 11, 2007 at the Planning Commission offices. City agency officials and city, state, and federal political representatives or their staff attended the PAC meetings. The PAC serves to ensure that the BRAC process move forward fairly and with the support of local political representatives and government agencies.

On May 29, 2007, the Philadelphia City Planning Commission hosted an advertised public hearing in conjunction with the regularly scheduled meeting of the SGNA. 53 people attended, including representatives of East Falls. PCPC provided a review of the BRAC process to date, described the draft recommendation, and fielded comments from the community. A large number of those attending identified themselves as affiliated with Eagles Nest Christian Academy, one of the applicants. Eagles Nest representatives questioned the adequacy of public outreach in the planning process and questioned the PCPC/LRA's proposed reuse. East Falls representatives reiterated their support for the Public Property/Police Dept. proposal.

Other comments received during the May 29th hearing included:

- The editor of the East Falls newspaper, *The Fallser*, stated that she must receive all meeting notices by the first of the month in order to include notices in the newspaper.
- Another community member from East Falls stated that they were less concerned with the specific user of the site provided that new sidewalks, lighting and greening improvements were made to the site.
- Another East Falls resident stated that they supported the Police Department's proposed reuse of the site because they believe it is appropriate to put a government use on government land.
- Another community member stated that the Police Department's reuse of the site is the only use that would preclude the community's use of the facility.

PCPC/LRA subsequently received several e-mails from Rev. Hausley of Eagles Nest, reiterating points made at the May 29th public hearing and noting new issues. PCPC/LRA responded by letter dated June 15, 2007. (see **Attachment B**)

On July 11, 2007, PCPC/LRA staff attended an evening meeting initiated by Eagles Nest. The meeting was attended by approximately 25 people. PCPC/LRA explained the BRAC process, reviewed the staff recommendation, and fielded questions. Several attendees expressed concern that the community did not have adequate input into the recommendation.

NOI Submissions

In September 2006, the Philadelphia City Planning Commission, as the LRA, sent out instructions for completing a notice of interest (NOI). Parties interested in obtaining the Germantown Veterans Memorial USARC under federal BRAC provisions for a homeless assistance conveyance or public benefit conveyance were requested to submit a NOI.

Six applicants submitted NOIs:

- Philadelphia City Department of Public Property/Police Department
- School District of Philadelphia
- Eagle's Nest Development Center and Christian Academy
- 1260 Housing Development Corporation
- Sister's House
- Stand Down Philadelphia

School District of Philadelphia

Description

The proposed redevelopment would involve the transfer of the Randolph Career Academy (RCA) and its Career and Technical Education programs (currently located at 3101 Henry Avenue) to the Germantown Veterans Memorial USARC location. The Randolph Career Academy enrolls approximately 400 students from across Philadelphia. RCA programs include carpentry, electrical, automotive mechanics, automotive collision and repair, culinary, and health-related technology. Besides major building renovations at 5200 Wissahickon Avenue, the proposal includes construction of an approximately 48,700 square feet addition. This would double the existing building footprint. The community was assured by the School District that the final plan would be compatible with the community's requests for landscaping of the existing parking lot, installation of sidewalks, and stormwater management. The School District is seeking a public benefit conveyance.

Analysis

The proposed land use, a school, would be appropriate to the site's surroundings, which include other institutional uses. The site has excellent public transit connections nearby for the students. Under the current zoning, R9A, a residential zoning category, the proposed school use would require a zoning certificate. Zoning certificates are generally granted to schools that have the community's support. While the School District may have current budgetary issues, any conveyance of this site to the School District is unlikely to occur before 2011. If chosen in Fall 2007, this timeline gives the School District an ample period to allocate appropriate funding to this project.

This proposal generated several concerns based on review by PCPC staff and the community:

- Peak traffic generation and parking spillover into the neighborhoods
- Intensity of use in relation to subsurface conditions
- Community concerns about school maintenance and the reuse of the Henry Avenue site that would be vacated
- Community concerns about the behavior of students in the community before and after school hours.

City of Philadelphia Department of Public Property (Police Department)

Description

The Department of Public Property submitted a NOI on behalf of the Philadelphia Police Department. Under this proposal, the Germantown Veterans Memorial USARC would be reused as an operational and administrative headquarters for the Philadelphia Police Department's covert and undercover units including the Narcotics Bureau and related functions. The existing building and parking areas would be renovated. At the request of

the community the front portion of the existing parking lot would be landscaped to improve its appearance and pavements will be installed. The proposed redevelopment requires 80 parking spaces.

Analysis

The proposed land use, a police facility containing offices, is appropriate for the site as it is adjacent to other offices, institutional uses and a rail line. The Police Department would be able to significantly reduce the amount of impervious area on site because there are no building footprint increases proposed and the projected parking need is less than half of that currently provided. This would help in the remediation of the sinkholes and on-site flooding. Under the existing residential zoning (R9A), a certificate from the Zoning Board of Adjustments would be necessary. Such certificates are routinely granted for municipal uses. The timeline for the site conveyance gives the applicant an ample period to secure funding for the proposed redevelopment of the Germantown Veterans Memorial USARC.

1260 Housing Development Corporation

Description

The submission from 1260 Housing Development Corporation proposed renovating the existing structures to create 48 one-bedroom units of affordable housing for seniors in Philadelphia's Germantown and East Falls neighborhoods. Up to 100% of these units would be allocated to elderly, homeless individuals or elderly individuals referred from homeless shelters or transitional housing. Many of these individuals would have behavioral health issues. 1260 HDC would partner with Episcopal Community Services to provide appropriate supportive services to meet the particular needs of the older adults residing at this site, enabling them to live independently. Additionally, 1260 HDC proposed to renovate the 1st floor of the main building to house their administrative and maintenance offices, which serve more than 1,300 housing units citywide. This proposal provided parking for visitors and approximately 50 employees, permitting the conversion of existing paved areas into open space. The applicant also assured the neighborhoods that 24-hour on-site security staffing would be provided.

Analysis

This proposal would require a variance from the Zoning Board of Adjustment. More significantly, the 1260 Housing Development Corporation submission may not have the necessary support from HUD, the Federal public homeless assistance sponsor, to be successfully considered as a qualified homeless assistance conveyance under the McKinney-Vento Act. This act is used as the standard for determining if a project qualifies for a conveyance to a homeless provider. Because the proposal is technically strong and the developer's track record is equally impressive, PCPC staff considered asking the applicant to revise its proposal to include more homeless services (in order to

gain HUD approval). However PCPC staff concluded that a revised submission would be unlikely to gain community support.

Eagle's Nest Community Development Corporation

Description

This applicant proposed to relocate and expand the existing school (called Eagle's Nest Christian Academy) and Community Development Center, both located approximately one block from Germantown Veterans Memorial USARC. The existing school services children from pre-K to 12th grade. The proposal included major renovations to the existing buildings, and the applicant agreed to remove some parking to create a green play area for the children.

Analysis

This submission has not met the Department of Education's standards for a public benefit conveyance as a school. According to Department of Education criteria, the Eagle's Nest submission was inadequate because the proposed redevelopment is not 100% educational, their submission did not demonstrate satisfactory financial information, and the submission did not include a 501(c)3 tax exemption letter. This indicates, for purposes of the LRA's redevelopment plan, that the proposal is not feasible.

Philadelphia Stand Down, Inc.

Description

This applicant's redevelopment proposal included a 40-bed facility for veterans who have been incarcerated and are reentering society, a 20-bed facility for drug and alcohol rehabilitation in conjunction with a 10-bed facility for detoxification, a drop-in center for housing referrals, placement and social services, and a satellite Veterans Administration Medical Center Screening Service and Psychological Screening Service. In addition to these services a day care center, food and clothing bank, a meeting room for local residents' use, library, training room, and offices were a part of Philadelphia Stand Down's proposal.

Analysis

The PCPC, as the LRA, determined that Philadelphia Stand Down had not yet established a track record or the financial capacity deemed necessary to effectively manage and sustain the proposed use. Also, Philadelphia Stand Down did not complete a large portion of the specified NOI submission items. Therefore, Philadelphia Stand Down was not considered qualified by the LRA for further consideration in the BRAC process.

Sister's House, Inc.

Description

This applicant proposed to redevelopment the Germantown Veterans Memorial USARC as a homeless shelter. Programs to be offered include educational learning workshops, training, on-site day-care, a recreation center for clients and community, job development, employment training, and substance abuse education. The Sister's House program was geared towards abused women and their children, as well as recently released female prisoners.

Analysis

The Planning Commission, as the LRA, determined that this application did not adequately respond to over half of the submission items. The NOI, as submitted, indicated that Sister's House had not established a track record or financial capacity deemed necessary. Therefore, Sister's House was not considered qualified by the LRA for further consideration in the BRAC process.

Recommendations

The PCPC/LRA finds that all four of the qualified NOIs seek to address important community needs. However, in considering several criteria that guide PCPC/LRA efforts to shape a consensus around a redevelopment plan, the PCPC/LRA finds that on balance the proposal by the Philadelphia Department of Public Property for Police Covert and Undercover Operations should be supported in the Redevelopment Plan.

The PCPC/LRA Staff Ranking of Proposals (**see Attachment C**) illustrates numerically that the Department of Public Property proposal was ranked first overall, with a total of 16.5 points, across five general criteria consistent with the PCPC/LRA redevelopment goals. The proposal by 1260 HDC was ranked second with 13 points. The School District proposal was ranked third with 11 points. The proposal by Eagles Nest was ranked fourth with 10 points. The points below further explain and support the PCPC/LRA recommendation.

Compatibility of Use

Among the submitted NOIs, the Police Covert and Undercover Operations proposal would be the best match for the physical plant of the existing facility, as Police operations are similar to the current use of the site.

Manageable Community Impacts

Overall vehicular traffic generated by Police operations may be greater than that associated with the other proposals, but the proposed Police operations at this site are not expected to generate sharp peak periods of vehicular traffic that would

result in congestion on Wissahickon Avenue or adjoining streets. The visual impacts of the proposed Police facility on the adjacent neighborhood would be comparable to the other proposed redevelopments, since all four qualified-NOI applicants demonstrated the capacity and willingness to provide sidewalks, improve landscaping, and sensitively maintain the property.

Eligibility for Homeless Assistance or Public Benefit Conveyance

The eligibility of a proposed redevelopment for a no-cost or low-cost conveyance is central to the financial feasibility of all four qualified NOIs. The PCPC/LRA has received preliminary indications from Federal agencies whose sponsorship is required for no-cost or low-cost conveyance that only two NOIs clearly appear to be eligible: the Police Covert and Undercover Operations proposal and the relocation of the Randolph Career Academy. PCPC believes the 1260 HDC proposal would not be eligible for a homeless assistance conveyance. Eagles Nest CDC has been informed that it is not eligible for a public benefit conveyance.

Environmental Remediation

The PCPC/LRA is aware that the site has a history of sinkholes that may be related to inadequate on- and off-site stormwater management and to the potentially-related subsidence of fill material used in the initial development of the site. The PCPC/LRA feels that the Police Covert and Undercover Operations proposal is best suited to any structural or human risks associated with these conditions. Further, the PCPC/LRA believes the City of Philadelphia, as sponsor of the Police Covert and Undercover Operations proposal, is best prepared to work with Federal authorities to thoroughly investigate and appropriately remediate these conditions in a timely fashion.

Strength of Notice of Interest (NOI)

PCPC/LRA staff rated each submittal on the basis of overall strength as well specific responses about organizational profile, proposed program, necessary buildings, organizational capacity, and financial plan. The City of Philadelphia's Notice of Interest was a very complete and detailed response to the PCPC/LRA request for NOIs. Out of twenty possible points, the City's NOI received 16.1 points, second only to the 1260 HDC rating of 17.6 points. The School District's NOI received 14.00 points, followed by Eagles Nest with 11.1 points.

Community Support

Two community organizations that represent neighborhoods immediately surrounding the Germantown Veterans ARC - the Southwest Germantown Neighbors Association and the East Falls Community Council - both conveyed to the PCPC/LRA the clear support of community members for the Police Covert and Undercover Operations proposal. Community preference is especially

relevant to the need for local support of any zoning change or variance required to permit reuse of the site.

Implementation Recommendations

Below is a list of actions needed for successful implementation of any redevelopment plan on this site. These actions relate to site improvements.

- Improve landscaping along Wissahickon Avenue to buffer the parking lot from the street.
- Construct a continuous sidewalk along the site's property boundary with Wissahickon Avenue.
- Remediation of existing sinkholes on-site and their underlying cause.
- Creation of on-site stormwater management systems. This may include permeable parking surfaces, underground retention basins, stormwater basins or swales. In particular, flooding issues along Wissahickon Avenue must be addressed.
- It is also strongly recommended that excessive impervious surfaces be removed and replaced by landscaped areas.
- Improved lighting for on-site safety.
- New fencing that does not include barbed or razor wire.
- Increased tree coverage/canopy in impervious areas.
- Support necessary zoning approvals by the City Council or Zoning Board of Adjustment.

Illustrative Site Plan

The illustrative site plan is a conceptual plan showing Planning Commission recommendations including sidewalks, stormwater management areas, and improved tree coverage, landscaping, fencing, and lighting.



Appendix A

BRAC 2005

Philadelphia City Planning Commission/LRA

Public Participation - Germantown Veterans Memorial Army Reserve Center

Outreach Phase: May 2006 – October 2006

- May 9, 2006 – Federal designation of site as surplus property.
- June 1, 2006 – PCPC/LRA notifies local elected officials of process.
- Week of June 5, 2006 – PCPC/LRA places public notices in local newspapers to advertise availability of site and solicit Notices of Interest (NOI).
- Week of August 10, 2006 – PCPC/LRA sends 114 letters of invitation to public workshop and tour of BRAC sites. Recipients include elected officials, homeless service providers, state and city agencies, neighborhood organizations, and
- Week of August 28, 2006 – PCPC/LRA places public notices in local newspapers to advertise public workshop and tour of site.
- September 12, 2006 – PCPC/LRA hosts public workshop and tour at site. Explains NOI process and deadlines. 39 people attend Germantown workshop, including a representative of the *Germantown Courier*. Instructions for NOI submission distributed and placed on PCPC web site.
- October 27, 2006 – Six NOIs received for Germantown Veterans ARC.

Planning Phase: November 2006 – to be completed July 2007

- November 10, 2006 – PCPC/LRA sends letters of receipt to all NOI applicants
- January 26, 2007 – PCPC/LRA hosts meeting of Planning Advisory Committee to explain process and review NOI submissions
- February 2007 – PCPC/LRA notifies two applicants that NOIs do not meet requirements for further consideration. PCPC/LRA asks remaining four applicants to clarify technical aspects of proposals.
- February 27, 2007 – PCPC/LRA staff participates in community meeting hosted by Southwest Germantown Neighbors Association (SGNA) at which four qualified applicants present proposals and answer community questions. City Council offices notified. Representatives from East Falls invited and in attendance. Attendance: 50.
- March 19, 2007 – PCPC/LRA staff attends follow-up meeting of SGNA and East Falls groups to summarize proposals and answer community questions.
- April 11, 2007 – PCPC/LRA hosts meeting of Planning Advisory Committee to discuss preliminary findings and recommendations.
- April 2007 – PCPC/LRA receives communications from East Falls Development Corporation and Community Council and from SGNA. Both indicate clear support for the reuse proposal by the Department of Public Property for a Police facility.
- May 18, 2007 – PCPC/LRA sends letters to NOI applicants to describe draft recommendation and invite participation in May 29th public hearing. PCPC/LRA sends letters of invitation to 30 community group leaders and elected officials.
- Week of May 21st, 2007 – PCPC/LRA places public notices in local newspapers to advertise public hearing on May 29th.
- May 29th, 2007 – PCPC/LRA hosts public hearing in conjunction with regular meeting of SGNA. PCPC/LRA provides review of process to date, describes draft recommendation, and fields community comments. Attendance: 53.
- June 2007 – PCPC/LRA places draft plan on Planning Commission web site.
- June 7, 2007 – PCPC/LRA provides press release to local newspapers to describe the BRAC process, the draft recommendation, and invite community input.
- July 11, 2007 – PCPC/LRA attends community meeting at invitation of Eagles Nest, and sends letter to update Planning Advisory Group.

PCPC

Philadelphia City Planning Commission

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June 15, 2007

Rev. Ricci J. Hausley, Executive Director
Eagles Nest Community Development Corporation
501 West King Street
Philadelphia, PA 19144-4613

Dear Rev. Hausley:

The Philadelphia City Planning Commission (PCPC), serving as the Local Redevelopment Authority (LRA) for the Germantown Veterans Memorial Army Reserve Center, 5200 Wissahickon Avenue, under the Base Realignment and Closure (BRAC) process, appreciates the many comments and suggestions you have recently conveyed to the City Planning Commission staff regarding the draft recommendation to support the reuse of the Germantown facility by the City of Philadelphia's Police Department.

This letter is to respond to items raised by Eagles Nest Community Development Corporation pertaining to public outreach supporting the planning process and to discrete factors contributing to the draft recommendation itself.

Public Outreach

As PCPC staff stated at the May 29th public meeting held in conjunction with the Southwest Germantown Neighbors Association at the Veterans Affairs offices at 5000 Wissahickon Avenue, the City Planning Commission welcomes comment from the public on the draft recommendation, and PCPC will continue to consider and incorporate comment into both the Redevelopment Plan and the Homeless Assistance Submission that the LRA must submit to the Federal Department of Defense (DOD) and Department of Housing and Urban Development (HUD).

The City Planning Commission staff expects that the Redevelopment Plan and the Homeless Assistance Submission for the Germantown facility, with incorporated comments, will be presented to the City Planning Commission at the public meeting currently scheduled for Tuesday, July 17th, at 1:00PM. The City Planning Commission will be asked to approve both documents for initial submittal to and review by DOD and HUD. BRAC regulations then give HUD 60 days to review the documents and determine compliance with HUD guidelines for balancing the needs of the homeless with other community needs.

The City Planning Commission recognizes your complaint that the outreach process did not provide for sufficient community input into the staff recommendation. The City Planning Commission also acknowledges your request that an additional public hearing be held in the community.

However, City Planning Commission staff feels that the outreach process to date has been appropriate, substantive, and in compliance with applicable public notice requirements and BRAC guidelines. The steps undertaken by the City Planning Commission thus far are listed in the accompanying enclosure. The City Planning Commission does not intend to hold an additional public hearing on the draft Redevelopment Plan. Going forward, over the next few weeks, the City Planning Commission does intend to:

- Continue to reach out to the *Germantown Courier* and *Fallser* community newspapers to encourage timely coverage, promote community awareness, and invite further feedback via phone, letter, or e-mail prior to the public City Planning Commission meeting on July 17th.
- Update and maintain materials for review and feedback on the City Planning Commission web site, <http://www.philapanning.org/plans/brac/brac.html>
- Brief local elected officials who serve on the Planning Advisory Committee established by the City Planning Commission for the BRAC process.

Of course, the City Planning Commission staff would still be happy to meet with representatives of Eagles Nest Community Development Corporation and other interested parties.

Draft Recommendation

In several e-mails related to the public meeting on May 29th, Eagles Nest CDC offered numerous observations on factors that Eagles Nest links to the City Planning Commission staff's draft recommendation to support the reuse of the Germantown facility by the City of Philadelphia's Police Department. Understanding that Eagles Nest is not a disinterested party, the City Planning Commission nonetheless appreciates the insight provided by these observations, and would offer the responses below:

- *Observation:* The Germantown Courier was insufficiently aware of the process, and Eagles Nest did not have an opportunity to present to East Falls (e-mail 5.26.07)
Response: The Germantown Courier is a vital news outlet in the community, and public notices about the BRAC process were placed in the paper three times, most recently on Page 14 of the issue dated May 23, 2007. Members of the East Falls community were invited to and attended the joint community meeting on February 27th with Southwest Germantown Neighbors Association (SWGA) at which all four qualified applicants, including Eagles Nest, made presentations. Applicants did not make additional presentations to either community group.

Appendix B

Philadelphia City Planning Commission

June 15, 2007

- *Observation:* Southwest Germantown Neighbors Association (SGNA) is too small or new a community organization to represent the broader Germantown community (e-mail 5.30.07) *Response:* City Planning Commission staff determined that the substantive direct impacts of reuse of the 5 acre site would be felt predominantly by the most immediately adjoining neighborhoods, and therefore staff felt it appropriate to work directly with the two groups currently and actively representing these immediately adjoining neighborhoods, SGNA east of Wissahickon Avenue and the East Falls Development Corporation and East Falls Community Council west of Wissahickon Avenue.
- *Observation:* An undercover Police operation would not benefit or fit into the community. (e-mail 5.30.07) *Response:* One of the City Planning Commission's roles as the LRA is to balance community and citywide needs. Staff feels that the proposed Police operation would serve the community not only by the public safety services it provides but also by ensuring the most appropriate and sound reuse of the site. Regarding the compatibility of covert or undercover operations with the community, the City Planning Commission regards these operations as most consistent with the current use of the site, and further notes that the site is at the edge of a mixed-use community and borders office and rail uses on two of its three sides.
- *Observation:* The liaison from the DOD Office of Economic Adjustment (OEA) is personally biased and incorrect in interpreting eligibility for public benefit conveyance (e-mails 5.30.07 and 6.02.07) *Response:* OEA staff has been very helpful in providing objective guidance to the LRA on the BRAC process, but OEA does not determine eligibility for public benefit conveyance. Each Federal department has its own guidelines for PBC eligibility, and the US Department of Education has communicated to Eagles Nest by letter dated March 19th, 2007 that the Department does not find the Eagles Nest application to be eligible for a low-or no-cost public benefit conveyance for educational use.
- *Observation:* The City Planning Commission should change language in its material to reflect that the US Department of Education has not followed up with a promised response to an appeal by Eagles Nest to reconsider the Department's determination. (e-mail 6.02.07) *Response:* City Planning Commission staff agrees that this should be reflected in the material, and the language will be changed.
- *Observation:* The City could have circumvented the BRAC process and avoided conflict by simply claiming the site, and the City and School District only entered the process when private groups expressed interest (e-mails 5.30.07 and 6.02.07) *Response:* Federal agencies are afforded an opportunity to claim a site before it is declared surplus under the Federal BRAC regulations. Only after a site is declared surplus do state government, local government, and all other interested non-Federal parties have an opportunity to express interest. The BRAC process does not give City agencies right of first refusal for a BRAC site.

Appendix B

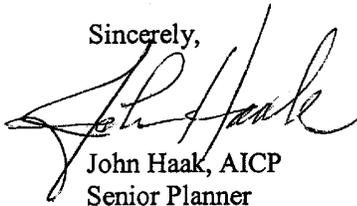
Philadelphia City Planning Commission

June 15, 2007

- *Observation:* Community support should be the deciding factor in satisfying community goals and determining the City Planning Commission recommendation (e-mail 6.02.02) *Response:* The City Planning Commission is mindful of the need to encourage consensus around a proposal that is feasible and appropriate to the specific challenges of the site. In addition to documented community support, the proposed Police facility stands out as being: most compatible with the existing use and potential environmental risks of the site; being eligible for the financial benefits of a public benefit conveyance, and; having demonstrated capacity to perform through the submittal of a strong and complete NOI.
- *Observation:* The City Planning Commission's draft recommendations to support reuse of both the Philadelphia Memorial and Germantown Veterans BRAC sites for Police operations is self-serving (e-mail 5.30.07) *Response:* The City Planning Commission evaluated the sites and proposals separately and on their merits. All qualified applicants were afforded the same opportunities to make their case to the communities and the LRA.

Again, the City Planning Commission thanks Eagles Nest for its continued involvement in the BRAC process. As stated in the May 18, 2007 letter to you from Executive Director Janice Woodcock, the City Planning Commission appreciates that the Eagles Nest Community Development Corporation requires larger facilities. Going forward, staff would like to continue to work with Eagles Nest to identify a suitable facility.

Sincerely,



John Haak, AICP
Senior Planner

cc Janice Woodcock, PCPC
Gary Jastrzab, PCPC
Richard Redding, PCPC
Alan Urek, PCPC
Jennifer Barr, PCPC
Liz Gabor, US DOD
Mary Hughes, US DOE

enc Public Participation – Germantown Veterans Memorial Army Reserve Center

BRAC 2005
 PCPC/LRA Staff Ranking of Proposals (ranked 1 to 4, with 4 = high, 1 = low)
 Redevelopment Plan - Germantown Veterans Memorial Army Reserve Center (ARC)

Proposals	Criteria					TOTAL
	Strength of Notice of Interest (NOI)	Compatibility with Site (incl. environmental and community impacts)	Feasibility (incl. eligibility for public benefit or homeless assistance conveyance)	Compatibility with Citywide and Neighborhood Plans	Broad Community Support	
Eagles Nest Community Development Corporation	1	3	1 Dept of Ed - no	2.5	2.5	10
School District of Philadelphia	2	1	3 Dept of Ed - yes	2.5	2.5	11
1260 Housing Development Corporation	4	2	2 HUD - considered unlikely	2.5	2.5	13
City of Philadelphia - Department of Public Property	3	4	3 Dept of Justice - yes DHS - probable	2.5	4	16.5

Explanation

Strength of Notice of Interest (NOI): 1260 HDC=17.6 , City of Philadelphia=16.1 , School District=14.0 , Eagles Nest=11.1
Compatibility with Site: City of Philadelphia deemed best match for physical plant and environmental risks of existing facility.
Feasibility: Both City of Philadelphia and School District exhibit financial capacity and generate off-site impacts.
 1260 HDC has financial strength and experience but is considered by PCPC/LRA as unlikely to qualify for homeless assistance conveyance.
 Eagles Nest has been determined by the Dept of Education to be ineligible for a public benefit conveyance.
Compatibility w/ Citywide and Neighborhood Plans: Tie: All four qualified NOIs seek to address important needs
Broad Community Support: Clear support for the City of Philadelphia was conveyed via the PCPC/LRA outreach process.
 Other proposals were effectively in a tie.
 Note: PCPC/LRA notified two of the applicants, Sister's House, Inc. and Philadelphia Stand Down, Inc., on February 22, 2007 that their NOIs did not meet PCPC's requirements for further consideration.