



# CITY OF PHILADELPHIA

DEPARTMENT OF LICENSES & INSPECTIONS  
1130 Municipal Services Building  
1401 John F. Kennedy Boulevard  
Philadelphia, PA 19102-1687

DAVID J. PERRI, P.E.  
Commissioner

June 1, 2016

The Honorable Darrell Clarke  
City Council President  
City Hall, Room 490  
Philadelphia, PA 19107

Dear Council President Clarke:

This letter is in response to questions raised at the April 12<sup>th</sup>, 2016 hearing before the Committee of the Whole on the Fiscal Year 2017 proposed budget for the Department of Licenses and Inspections (L&I). The questions were recorded as follows:

**From Council President Clarke:**

- 1. Is there a particular reason why the time frame is two years for residents to be able to contact L&I when they believe they have an issue related to a side-wall as a result of a demolition?**

That time frame is set by the state. Under PA State Law, the Statute of Limitations for filing property damage claims in Pennsylvania is two (2) years.

**From Councilman Taubenberger:**

- 2. Can we explore possible legislation to do both Notices of Violation (NOV) and Code Violation Notices (CVN) when we have issues with overgrown weeds on vacant properties?**

The Department of Licenses and Inspections is happy to meet with your office to discuss how the Property Maintenance Code is enforced in this context, and possible ways to improve enforcement procedures.

**From Councilman Domb:**

- 3. Can L&I come back to us and share your analysis of what the true cost of permit fees should be?**

L&I will be performing a comprehensive analysis of all permit fees to determine if the current fee structures are appropriate. L&I expects to have this analysis complete within the next six (6) months.

**From Councilman Henon:**

- 4. The penalty for being caught without a building permit is double the cost of the permit fee. What about the penalty for being caught without a zoning permit?**

If caught without a zoning permit, the zoning permit fee is also doubled.

- 5. Do you know the ratio of inspectors to real properties in the City?**

There are approximately 579,000 parcels in the City of Philadelphia. Inspector staffing levels in L&I are currently as follows:

**BUILDING INSPECTORS**

Seventy-one (71) current Building Inspectors = one (1) inspector for every 8,155 properties in the City.

In FY13, prior to the 22<sup>nd</sup> and Market Street collapse, L&I employed a total of 52 Building Inspectors, which equated to one (1) inspector for every 11,135 properties in the City.

In FY17, L&I will increase the total number of Building Inspectors to 95. This staffing increase will raise the ratio to one (1) inspector for every 6,095 properties.

It should be noted that the total number of properties undergoing construction or renovation at any given time is far less than the total number of properties listed above. As a point of reference, 10,540 of the city's 579,000 parcels currently have active building permits.

**CODE ENFORCEMENT INSPECTORS**

Fifty-five (55) current Code Enforcement Inspectors = one (1) inspector for every 10,527 properties in the City.

In FY17, L&I will increase the total number of Code Enforcement Inspectors to 75. This staffing increase will raise the ratio to one (1) inspector for every 7,720 properties.

It should be noted that the total number of existing properties being inspected for property maintenance or fire code violations at any given time is far less than the total number of properties listed above. As a point of reference, 42,354 of the city's 579,000 parcels currently have active code enforcement violations.

**From Councilwoman Sanchez:**

- 6. Are you implementing rolling enrollment for all licenses?**

Yes, the Department has implemented rolling expiration dates for all business licenses. The Department will be implementing rolling expiration dates for trade licenses when Phase 2 of eCLIPSE is implemented later this year.

- 7. As you staff up and expand offices, will you be able to give us your criteria for selecting geography of assignments? How do you decide how many people are staffed per area, where district boundaries are, etc.?**

L&I will be reviewing areas of the City with the highest permit volumes. Within those areas, L&I will work with the Department of Public Property to review locations that can be leased and which meet our space needs. Also, L&I ideally would like to lease space along major thoroughfares that can easily be used to establish clear district boundaries. Anticipated volume and type of construction will also be taken into consideration. Once office locations and geography of district boundaries have been finalized, L&I will be able to determine optimal staffing levels for each district location.

L&I will provide an update on this process within ninety (90) days.

**From Councilwoman Parker:**

- 8. Could Council review L&I's assignments for off-hours inspectors? Particularly regionally to see if there is a need to increase off-hour staffing?**

The Department deploys off-hours inspectors from the Nuisance Property Unit (NPU) to respond to service requests involving businesses that operate during off hours or weekends. Six (6) NPU inspectors provide support to the Police and Fire Departments with regards to enforcement of cease operations orders, Fire, Zoning, and licensing codes and regulations. NPU also supports the Department's Contractual Services Unit (CSU), which details inspectors 24 hours per day, 7 days per week in response to emergencies involving imminently dangerous properties. NPU and CSU inspectors are not assigned a dedicated geographical area for off-hours inspections.

The Department also deploys off-hours inspectors to patrol areas that have experienced high levels of unpermitted construction projects.

- 9. Can we establish a rubric for measurable and un-measurable provisos to help guide establishment of provisos?**

L&I will consult with the Law Department, the Zoning Board of Adjustment (ZBA) and City Planning to discuss this issue. L&I will provide a response within ninety (90) days.

**From Councilman Domb:**

- 10. In 2015, do you know how many unpermitted construction violations occurred?**

During Fiscal Year 2015, L&I issued 786 violations for unpermitted construction sites (A-901.13/1). During Fiscal Year 2016 to date, L&I has issued 558. The Department's enforcement activity in FY16 has increased due to the deployment of additional state certified inspectors to the Department's district offices.

**From Councilwoman Blackwell:**

- 11. Will you look at the bill we introduced on water main breaks and contractors who fixed it? Can you take a look and advise what we should do?**

L&I will review the bill and provide feedback by Friday June 17, 2016.

Please feel free to contact me with any questions you may have about the information provided in this response.

Sincerely,

A handwritten signature in black ink that reads "David J. Perri". The signature is written in a cursive style with a small circle at the end of the last name.

David J. Perri, P.E.  
Commissioner

cc: Michael DiBerardinis, Managing Director  
Brian Abernathy, First Deputy Managing Director  
Rob Dubow, Director of Finance  
Anna Wallace Adams, Budget Director  
Sarah DeWolf, Deputy Budget Director