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November 7th, 2020

TO: Knoxville-Knox County, TN Planning Commission

SUBJECT: OPPOSITION OF REZONING REQUEST

Members of the Knoxville-Knox County Planning Commission,

Hello and thank you for taking the time to address my concerns. I'm writing this letter to address my OPPOSITION of the rezoning of property located at 3430 Zion Road in Knox County, TN. The property request is being made by ANGELIC MINISTRIES, 1218 N Central St. Knoxville, TN 37917, in order to rezone an existing facility to house a "Men's Home" according to their website. The rezoning requests is for vegetation (9-A-20-RZ) and Multi-Family (11-F-20-UR).

- According to Angelic Ministries, if this rezoning is approved it will allow the non-profit to establish a "Boarding House" for men. The ministry has been very vague on what the terms "Men's Home" and "Boarding Home" actually constitute and who would actually be residing there. I have emailed Angelic Ministries with very specific questions concerning this residence and haven't received a reply. From what I have gathered with the limited information Angelic Ministries has provided about the proposed "Rehabilitation Facility" is that it would be a halfway house for men who are court ordered to live in such a facility until they are deemed fit enough to re-enter society and start life again on their own. An actual definition of Halfway House should be referenced before further discussion. *A **halfway house** is an institute for people with criminal backgrounds or abusive drug use tendencies to learn (or relearn) the necessary skills to re-integrate into society and better support and care for themselves.* However, "Halfway House" is an umbrella term and can be cited for many different types of living facilities. Another definition that could be applied to this facility is *Restitution center or community based/residential correctional facility* - acts as an alternative to traditional incarceration, *instead of prison or jail*, where individuals can go to serve their entire sentence. In restitution centers, people are expected to work and surrender their paychecks to be used for

court-ordered fines, restitution fees, room and board, and other debts. Community based/residential correctional facilities frequently include a work-release component, but they function more as minimum-security prisons than reentry services.

Unfortunately, Angelic Ministries has failed to provide adequate information to the actual plans of this facility and therefore it must be inferred what this facility will actually result in for our community. However, as anyone knows, plans can and often do change and as long as Angelic Ministries is operating the facility within the broad confines of TN Codes governing these types of facilities, they can ultimately do as they please with such a facility.

CAUSES FOR CONCERN:

My obvious concern is that my family will now be living within a five-minute walk of convicted drug addicts who are court ordered to stay in a group home. It might as well be called a Community Corrections Facility considering the way Angelic Ministries plans to set-up the facility. In a recent informational meeting, Angelic Ministries said all doors and windows would be alarmed and the residents would not be “permitted” to leave, but the staff will not stop them if they are intent on leaving.

Angelic Ministries has no experience dealing with a facility like this. There is no credible documentation citing experience by anyone on their staff of having oversight of a facility of this type. According to the Angelic Ministries website they help needy families and individuals with household items to include furniture, clothes, food, linens, and hygiene items. This would lead a prudent person to believe they have no experience with a facility of this type. This includes a lack of mental health providers for drug addicts who are the proposed residents of such a facility.

In addition to not having experience in this realm, they would also be able to operate this facility under vague regulations by the State of Tennessee according to “*TDOC Guidelines for Transitional Housing Providers*” located on www.tn.gov. There is no protocol of coming and going by the residents as they please. It could be inferred that the staff (recovering addicts themselves) are merely there to “tattle-tell” and basically glorified “Hall Monitors”.

Angelic Ministries stated that no sex offenders or violent offenders would be housed at this facility. However, under the document “*TDOC Guidelines for Transitional Housing Providers*” there is nothing restricting this from happening once a rezoning is approved. As long as they are within the scope of this document, Angelic Ministries would be permitted to operate any type of facility they wanted to in the future. Any agency can say they don’t plan on doing something to appease those in a community. However, once a rezoning happens an agency may do whatever it decides as long as it is complying with the bounds of this document.

A childcare and learning facility, WEBB LEARNING CENTER, 6107 BALL ROAD, is located just outside the 1,000 foot property line for this proposed facility should any number of different offenders, to include sex offenders, be residents at this proposed facility. This learning center has an address on Ball road, but the actual driveway and parking is located off of Zion Road. Since this child care business is located just beyond the legal requirement of 1,000 feet there would be no stopping Angelic Ministries from housing sexual offenders at this facility.

The location to this facility is also not on any sort of public transportation route of any kind. There are not even sidewalks to the facility on any part of Ball Road. A reasonable person would think that grown men would want to be housed in a location where they have access to public resources and facilities to help them reintegrate into society. There are no public facilities within a safe walking distance to support men at a phase in their life where they are trying to rebuild themselves.

Any number of studies and statistics are available to validate that hosting a residential society reentry facility in a residential, specifically rural area like Karns is not a good idea.

"The State of Pennsylvania has had its own problems with halfway houses, particularly the high rate of recidivism of those who cycle through reentry facilities. Incredibly, a 2013 study by the Pennsylvania Department of Corrections (PDOC) found that prisoners sent to halfway houses were actually more likely to re-offend than those released directly from prison. According to the study, 67% of prisoners sent to transitional facilities were rearrested or returned to prison within three years, compared to 60% of offenders released to the streets. The study examined 38 privately-operated and 14 state-run halfway houses, and the results were similar for both categories."

"New Jersey has embarked on a grand experiment, shifting thousands of prisoners from expensive-to-run state prisons into less costly, privately-operated halfway houses. The state's prison system has under 25,000 beds while approximately 3,500 offenders and parolees are housed in around two dozen halfway houses. But the system is not without its problems; about 5,100 residents have absconded from halfway houses since 2005, and former employees and residents report that drug and alcohol use, crime and violence are rampant at some facilities."

Gilna, Derek. "When Halfway Houses Pose Full-Time Problems." *PrisonLegalNews.org*, 10 January 2015, <https://www.prisonlegalnews.org/news/2015/jan/10/when-halfway-houses-pose-full-time-problems/#:~:text=According%20to%20the%20study%2C%2067,were%20similar%20for%20both%20categories>.

In addition, according to an April 2014 recidivism report by the Bureau of Justice Statistics, 49.7% of offenders return to prison within three years after release and 55.1% return within five years.

CONCLUSION:

In closing, I'm to understand that Angelic Ministries originally sought to locate this residential facility in the Halls community and that request was ultimately denied due to the concerns of Halls community residents. I see no reason why the same instances, opinions, and causes for concern from the Halls community against the introduction of this community based residential transition/correctional facility would not hold the same weight and validity in the Karns community. This community is made up of

single family households with literally hundreds of small children and elderly residents within a 10 minutes walking distance to this proposed location (five major subdivisions to include Foxfield, Huntcrest, Miller's Plantation, Maple Valley, & ShadowBrook, along with a brand new future subdivision off Lobetti Road). Pair this with the fact there is an apparent gross lack of experience within the Angelic Ministries organization for operation this type of facility and this would lead any prudent person to see a road to disaster if this rezoning was approved. The size and type of facility would be much more suitable for an elderly care facility or specialized facility for any group other than drug addicted convicts.

Although I vehemently disagree and oppose this residence and rezoning at this location, I do understand the need for facilities like this in the city and county of Knoxville. I do however believe there are many more very well qualified places to establish a residence like this. I feel Angelic Ministries has identified an opportunity for using an existing facility that is cost effective for the organization, but not a facility that is actually in a location to provide the proper community resources necessary for individuals coming out of jail with addictions and other problems. So cost saving seems to be the overall driving force and not actually providing the best for the proposed residents.

I have lived in the Karns community in my current home for 12 years. I bought in this specific location to raise a family out of the reaches of the inner city and "dealings-with" such as this. I'm sure if the same non-profit were to propose opening and hosting a residential facility like this in your neighborhood all of you would also oppose this measure and rezoning.

Thank You for strongly considering my opposition to deny these rezoning requests when the commission meets on November 12th 2020 and any future dates when this may be on the planning commission's agenda.

Very Respectfully,

Kevin B. Carter