



February 20th 2018

RE: KenCrest
3132 Midvale Avenue
Philadelphia, PA 19129

RE: AP# 796015

Philadelphia Zoning Board of Adjustment
18th Floor, 1515 Arch Street, Philadelphia, PA 19102

Dear Zoning Board of Adjustment members:

On February 12th, 2018 at a general membership meeting of the East Falls Community Council (EFCC), which was advertised in advance and open to the public, the majority of the members of EFCC who were present voted in accordance with our bylaws to oppose KenCrest's proposal.

As a Registered Community Organization (RCO) in East Falls, our membership urges your rejection of KenCrest's requested variance.

This was the fourth and final public meeting regarding the KenCrest proposal over several months. Additional input included an online survey. A petition documenting strong opposition to the KenCrest proposal was created by near neighbors. Early efforts by EFCC and KenCrest to discuss a potential agreement between EFCC, KenCrest and the near neighbors foundered due to strong opposition to KenCrest's proposal.

The following items should cause the ZBA to deny KenCrest's requested relief:

- Much of the concern expressed by neighbors stems from the rejection of the proposal by Licenses and Inspection which included the department of Licenses and Inspection finding that the proposed use is a "hospital (medical care home)". This use is prohibited in the zoning district and incompatible with the residential character of the immediate vicinity.

- The proposal to transition the operation from a Monday to Friday nine to five operation to a 24/7 operation, with the potential for more frequent and 24/7 emergency vehicle traffic and potentially sirens, is problematic for the neighborhood which is generally residential in character.
- The intersection of McMichael and Midvale Avenues is hazardous due to higher volumes of vehicles and more frequent traffic. The requested use could result in an increase in access and egress by visiting doctors, care givers, emergency vehicles, and family members on a 24/7 basis and at shift change time. There is already a history of double parking by KenCrest personnel making traffic sight lines at this intersection difficult. Due to the limited access, EMS services at the property would need to double park on either Midvale or McMichael to support or transport to and from the facility.
- Our understanding is that given the proposed use, new nighttime and safety-oriented lighting requirements for the facility will intrude on the residential quality of the immediate area.
- The proposed use will require specialized medical waste disposal and pickup as well as the potential for more trash. The results will likely include additional noise and traffic and more large vehicles.
- An emergency backup generator will need to be started for testing weekly. It will likely be a diesel generator which is loud - More details regarding the generator equipment were requested but not received.
- The site is small forcing the required mechanical equipment and generator to be placed within the zoning setbacks or immediately adjacent to the neighboring property line, neither of which is desirable. This spacing challenges for required equipment is illustrative of our conclusion that the site is too small for the proposed use.

The nearby neighbors regret being forced into a negative position but find KenCrest's variance request to be completely inconsistent for zoning use and purpose at this specific location.

Accordingly, please reject their request for relief.