



December 5, 2024

**To:** Mayor Parker, Councilmembers, and City Staff  
**From:** Oakhurst Neighborhood Association Officers and Board Members  
**Re:** SP-24-013 - A Letter in Opposition to Proposed Site Plan Amendment

Dear Mayor Parker, Councilmembers, and City Staff,

We, the officers and board members of the Oakhurst Neighborhood Association “ONA”, write to you in formal opposition to the proposed Site Plan Amendment more particularly described as SP-24-013, and respectfully request that this Council accept the recommendation of its Zoning Commission and **deny** this application. A three-time Fort Worth Neighborhood of the Year winner, Oakhurst is currently celebrating its 100th Anniversary and is deeply invested in ensuring that it remains one of Fort Worth’s top neighborhoods for the next 100 years and beyond.

If approved, SP-24-013 would allow for the construction of a facility with an unclear intended use, but a very foreseeable and multi-faceted impact to the surrounding community, including the Oakhurst neighborhood. There are readily apparent inconsistencies between the applicant’s statements to the Zoning Commission at the November 13, 2024 hearing, its current application (SP-24-013), prior application (ZC-22-035), and statements published on its website.

Oakhurst encourages you to compare these statements and seek more definitive answers from the applicant. It seems that the building, now described as a discipleship center, will house 100+ victims of human trafficking and offer services to aid in their recovery. To be clear, the Oakhurst Neighborhood Association and the more than 343+ neighbors<sup>1</sup> from whom we have

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<sup>1</sup> The attached petition is up to date as of the November 13, 2024 Zoning Commission hearing. Oakhurst continues to receive signatures in opposition from neighbors and will submit a final petition in opposition prior to the December 10, 2024 council meeting.

obtained signatures oppose the *proposed location* of this facility, not the applicant's desire to help victims of human trafficking.<sup>2</sup> See Exhibit A, Oakhurst's petition in opposition.

In fact, many of Oakhurst's neighbors dedicate their own professional careers and personal time to serving and assisting those in need. Oakhurst neighbors are doctors, nurses, mental health professionals, prosecutors, peace officers, social workers, civil servants, victim advocates, and regularly volunteer with churches and local non-profits to help the same or similar populations that applicant also seeks to assist.

Applicant did not communicate directly with Oakhurst leadership prior to filing for its building permit for this project, and Oakhurst maintains very objective questions and concerns about this project that have not been answered by Applicant. But based on current issues with parking and traffic congestion, and concerns with public safety, lighting, and the inadequacy of the barrier between this facility and the neighborhood, Oakhurst and its residents have very sincere and objective concerns/questions regarding this project, most notably: *is the proposed location an appropriate location for such a facility?*

There are six (6) objective criteria/factors that Council may consider when deciding whether or not to approve this site plan amendment.

1. The nature and character of the development and adequacy of the buffer between proposed improvements on the site and adjacent property;
2. The adequacy of utilities, access roads, drainage and other necessary supporting facilities that have been or will be provided;
3. The adequacy of the design, location and arrangement of all driveways and parking spaces so as to provide for the safe and convenient movement of vehicular and pedestrian traffic without adversely affecting the general public or adjacent developments;
4. The adequacy of any nuisance prevention measures that have been or will be taken to prevent or control offensive odor, fumes, dust, noise and vibration;
5. The effect directional lighting will have on neighboring properties; and

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<sup>2</sup> On October 17, 2024, the Oakhurst Neighborhood Association held a general membership meeting. During this meeting, ONA members voted unanimously (99-0) to both oppose the proposed location of SP-24-013, as well as authorize the board to hire an attorney to represent Oakhurst's interests before the Zoning Commission and City Council.

6. The impact of the proposed development on adjacent property values and on the ability of the adjacent property to be developed.

Below, Oakhurst sets forth evidence supporting and substantiating **denial** based on all of these factors. Oakhurst addresses these factors both specifically and generally in terms of neighborhood concerns.

### **I. Neighborhood Concerns:**

#### **1. Parking/Traffic/Density (Factors 2 & 3)**

- a. There is only a singular point of access to the proposed facility—Oakhurst Scenic Drive (a narrow, two-lane road without a shoulder meant to be a scenic by-way), making access points inadequate. The amount of traffic along Oakhurst Scenic has greatly increased since applicant moved into its current space. The amount of congestion creates safety hazards including blocked visibility for ingress/egress into the neighborhood. This small road is the only point of access to applicant's property, as well as the most expedient access point to Oakhurst's West Addition. The road and surrounding infrastructure cannot handle a 43,000 sq. ft. facility meant to house 100+ people.
- b. Simply put, there is not enough room to build this size or type of facility on the property. The current application mentions an "abundance" of land, but Oakhurst neighbors know that applicant has outgrown its current property and see the evidence of this every Sunday, during school drop-off/pick-up, during food bank hours, and during other events when parking and traffic issues prevent neighbors from being able to readily enter or exit the neighborhood. **See Exhibit B**, various photos and videos demonstrating traffic congestion due to density and lack of parking.
- c. Of applicant's own admission, the church is "PACKED! People get parking tickets because there isn't enough room." **See Exhibit C**. Despite "No Parking" signs on the east side of Oakhurst Scenic, church members frequently park on that side of the street or up into the neighborhood. **See Exhibit D**, various photos of vehicles parked on the east side of Oakhurst Scenic with visible "No Parking" signs.
- d. On Sunday, November 10, 2024, neighbors counted 54 cars parked alongside Oakhurst Scenic Drive. Church members were seen leaving the full parking lot and being directed to park along the road by church volunteers. Based on these numbers, the proposed "18+ parking spaces" applicant will allegedly add with the

building will not be enough to prevent traffic and parking issues from continuing or even increasing.

- e. On Sunday, December 1, 2024, neighbors waited to exit the west side of the neighborhood as traffic backed up from the light at Oakhurst Scenic and Yucca past W Lotus Drive. Neighbors then waited in a line of over 40 cars to get to the intersection in order to access I-35. *See **Exhibit F***, various videos of neighbor's attempt to exit neighborhood.

## **2. Public Safety (Factor 6)**

- a. The size, scale, location, and public nature of this facility poses a safety threat to the community at large. Victims of human trafficking have been through unimaginable trauma at the hands of very real and hardened criminals. As awful as it is, these criminals consider the victims to be their "property" and they will go to great lengths to recover their property. That is one of the reasons this location is so problematic. It is readily accessible from one of the most highly travelled freeways in the United States. The facility's location will be publicly advertised making it easier for the traffickers to find. And lastly, should the traffickers be unable to retrieve their property from the facility, they will be mere yards from a school and neighborhood to find their next victim.
- b. Oakhurst has spoken to several professionals in the areas of victim assistance and rehabilitation whose best practices suggest that residential-based treatment facilities be limited in size (less than 10 residents at a time) and that the location remain undisclosed for this very reason. Even the best practices utilized by FWPD suggest housing more than 4-5 victims of trafficking is not a supportable model and will lead to more issue and even dangerous situations. *See **Exhibit H***, best practices shared by FWPD Human Trafficking Division with Oakhurst.
- c. It appears applicant also understands that there is a public safety concern associated with this facility. Why else is there an 8-foot masonry fence around the perimeter of the facility, 24/7 security, security lighting and cameras, monitored entry/exit, "quick response to police department," and local and state partnerships? *See **Exhibit E***, flyer posted by Applicant to only *some* homes in Oakhurst.
- d. Oakhurst has spoken to its FWPD Neighborhood Patrol Officer and the Sergeant over FWPD's Trafficking Division, and neither knew of any cooperation or partnership between FWPD and applicant to have a "quick response" team or private escorts for women wishing to leave the facility. Applicant has told

Oakhurst that there would be both avenues of police presence and response. *See Exhibit E*. It is Oakhurst's understanding that FWPD and other community partners have communicated their concerns with the occupancy and public nature of this facility to applicant, but applicant desires to continue with its original plan.

- e. Where are the community partnerships? Neither Applicant nor the Justice Reform are members of 5 Stones Task Force and there is no indication they intend to be. Oakhurst is concerned that the lack of community resources and partnerships will impact the success of the facility and program—ultimately resulting in its failure and a vacate 43,000 sq. ft. dormitory down the hill from the neighborhood.
- f. What do Unbound Now, the Net, Safehaven, One Safe Place, Alliance for Children, and other successful community-based programs of a similar nature think about this? Why are they not voicing public support if this facility and programming are as great as applicant alleges?
- g. In conclusion, objectively, it is unreasonable to have a publicly advertised 100+ bed rehabilitation center for victims of human trafficking along I-35, down the street from a school, and across the street from a single-family neighborhood.

### **3. Unknown Future Use (Factor 6)**

- a. Of applicant's own admission, approximately 50% of these facilities will fail. What is the plan if applicant's vision does not come to fruition? While the applicant currently maintains that the facility will be used to house victims of human trafficking, there is no guarantee that the facility would not be converted to other uses.
- b. If the trafficking program closes, there will be a 100+ bed dormitory-style complex that applicant will be looking to use for other purposes. Applicant could shift the facility into a homeless shelter; a center for drug addiction reform; housing for church members; bitcoin mining hub; an apartment complex or any number of other uses that could negatively impact the community. Further, it is unclear if Applicant will request an expansion of the facility in the future. This creates a very slippery slope for future zoning cases across Fort Worth and what can be built within (and adjacent to) single-family zoning.

### **4. Inadequacy of Buffer and Nuisance Issues (Factors 1, 4 & 5)**

- a. There is little to no buffer separating the proposed improvement from Oakhurst homes. While there are trees, many of them are tagged with an unknown but

possible intention of cutting them down. *See Exhibit G*, photo of marked trees along Oakhurst Scenic. If these trees are cut down, this will reduce the already little to non-existent buffer between the project and Oakhurst. Applicant appears to understand the inadequacy of the natural buffer between the project and the neighborhood, which may be why it is proposing to create a buffer of its own—an 8-foot masonry wall around the entirety of the complex. The topography of the land and the height of the proposed project means that the very large complex will be extremely visible and basically in the backyards of all homes along Oakhurst Scenic.

- b. Applicant proposes 24/7 security lighting as a means of “increased security” for the facility. *See Exhibit E*. Due to the very real security threat posed by the use of this facility and the proximity to the neighborhood Applicant’s proposal of security lighting could create a myriad of issues for Oakhurst homes in the form of lighting pollution, which would greatly impact homeowner’s enjoyment of their homes and yards. The lighting and publicly marketed nature of the facility would allow for ease of access to nefarious individuals any time of time, increasing the safety issue.
- c. There is a high likelihood of an increase in noise to Oakhurst with this proposed facility—it is, after all, a dormitory meant to house 100+ people and with people come activity and with activity comes noise. Oakhurst has already seen an increase in the noise related to Applicant’s school sports events, carnivals/fairs, and other events. And with the proposed improvement these types of events will surely only increase. What does this mean for neighbors’ ability to enjoy their homes?

## **II. Unanswered Questions:**

### **1. What is the intended use of this facility?**

- a. The applicant first applied to build the same or similar facility in 2022. At that time ZC-22-035 was filed to amend PD 586 to include transitional housing. City Zoning and Land Use employees determined the proposed use was “not compatible with surrounding single-family and school related land uses. The proposed use would also eliminate much needed parking for the existing church.” In Oakhurst’s opinion, nothing has changed.
- b. The applicant has now fine-tuned its application and is calling the facility a “discipleship center” to appear consistent with its PD, which allows for “church

related activities.” The applicant no longer seeks to rezone based on this purely semantic change although the intended use of transitional housing and treatment remains the same. In fact, applicant has been very vocal and published on their website that this facility will be a “residence for survivors of human trafficking.” As discussed above, victims of human trafficking will have a myriad of mental health and substance abuse diagnoses that will require significant treatment for recovery. Applicant has told Oakhurst neighbors that it intends to employ nurses to offer healthcare at the new facility. Because of the population that will be residing at this facility, it is really more akin to an unlicensed and unregulated in-patient mental health and substance abuse treatment center.

- c. It is unclear from the application whether applicant will avail itself to licensing or regulatory authority required of in-patient or residential treatment facilities. It is also unclear what credentials applicant will require of its employees tasked with assisting victims in their recovery and/or treatment.
- 2. Does the intended use constitute a “church related activity” as required by the property’s Planned Development, PD 586?**

- a. There are only a handful of properties in Fort Worth with PDs that include “church related activities.” This is novel and irregular language that is in no way legally settled. For this reason, the Oakhurst Neighborhood Association has pooled its limited resources as a volunteer community organization and hired attorney Alison Ashmore to provide context and a legal opinion on this issue.
- b. By comparison, just down the road, Recovery Resource Council (RRC), which provides outpatient substance abuse treatment, is being forced to vacate their building because of the widening of Hwy 121. Their application to the board of adjustments, BAC-24-033 states, “the city classifies their business as a medical office because therapists are employed and clients will visit the facility.” If the city classifies an outpatient treatment center as a medical office, it seems a residential treatment center such as that contemplated by applicant would classify as a medical facility, not a church related activity.

We thank you for your time and consideration in reviewing this pending matter. Oakhurst would renew its request that this Council **deny** SP-24-013 because there is simply not enough room for any additional improvements within this site, and any additions would therefore exacerbate already existing issues with parking and traffic congestion. The proposed use would also pose a very real public safety threat to the surrounding community. Further, the unknown future use, proposed security lighting, and probability that more trees will be cut down between

the site and Oakhurst would clearly have a negative effect on property values and impede neighbors' ability to enjoy their homes. There are still more questions than answers at this point, but one thing is clear, the proposed site is objectively inappropriate for the proposed site plan amendment for multiple reasons. We therefore ask that applicant respectfully consider a more appropriate location that will ensure the safety of the trafficking victims it seeks to help, as well as the community at large, and allow Oakhurst residents to continue their quiet enjoyment of their property.

Sincerely,

*Oakhurst Neighborhood Association*

*Officers & Board Members*