



# CITY OF EVERMAN

## Office of the City Manager

September 1, 2022

Honorable Fort Worth Mayor & Council Members,

I hope this letter finds you well and appreciate your time and consideration on this issue. It is my hope that you will review this letter and the information within it. I know this letter is lengthy; however, this information is vital as this is a critical issue and concern for the City of Everman, the City of Fort Worth, Tarrant County, and all of our residents in this region. This letter is in reference to Zoning Case #22-102, located at 4401 Enon Road. The applicant for this case is Mr. George Moore, who is requesting a Zoning Change from Agricultural to Manufactured Housing.

On July 11th, 2022, the Everman City Council unanimously adopted Resolution #2022-07-01 in opposition to the zoning application. This letter details the concerns and reasons for the opposition, as well as to clear up any misconceptions or misunderstandings regarding our position.

### City of Fort Worth Future Land Use and Comprehensive Plan

This zoning request is inconsistent with the City of Fort Worth Future Land Use or Comprehensive Plan. The current plan calls for this particular property to be zoned Single Family Residential. The City of Fort Worth Staff originally classified this application as a “substantial deviation” from the adopted plan and originally recommended denial for this case. The Zoning Commission first heard this case on July 13th, 2022, at which time the applicant requested a 30-day continuance. I spoke at this meeting in opposition to this change, at the direction of my City Council. At that meeting, Commissioner Wanda Conlin stated that it was her first inclination to move for denial of this request due to the substantial deviation; however, she agreed to allow a 30-day continuance, which ultimately was passed by the Zoning Commission.

Recommendation	
<b>Land Use Compatibility:</b>	Requested change is <b>not compatible</b> .
<b>Comprehensive Plan Consistency:</b>	Requested change is <b>not consistent (significant deviation)</b> .
<b>Staff Recommendation:</b>	<b>Denial</b>

*(Recommendation on Staff Report from July 13, 2022)*

This case was then rescheduled and heard by the Zoning Commission on August 10th. The proposal from the developer did not change, however, the staff recommendation changed from “Denial” to “Approval”. The Land Use Compatibility was also changed to compatible, with no changes in the proposed plans. Staff cited that the change was due to the product being “much higher quality than other MH developments and helps address affordable housing demand”.



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### Recommendation

<b>Land Use Compatibility:</b>	Requested change is <b>compatible</b> .
<b>Comprehensive Plan Consistency:</b>	Requested change is <b>not consistent (significant deviation)</b> .
<b>Staff Recommendation:</b>	<b>Approval</b>

*(Recommendation on Staff Report from August 10, 2022)*

The fact remains that this proposal is still a significant deviation from the Comprehensive Plan and the Land Use Compatibility is arguable. I will address the affordable housing demand separately within this letter.

### Flood Prone Region and Mitigation Efforts

This particular region has been extremely prone to flooding. In 2018, the City of Everman and Tarrant County experienced tremendous flooding in this area that affected over 70 homes and businesses. We have seen increased incidents in recent years, most likely due to changing weather patterns. Since 2018, the City of Everman has been working tirelessly to address potential mitigation projects within this region. We have worked very closely with our partners at Tarrant County and the North Central Texas Council of Governments on this effort. In 2019, the City of Everman completed a Hazard Mitigation Action Plan, which was incorporated into the Tarrant County Plan. Since the completion of this plan, the City of Everman and Tarrant County has pursued funding opportunities through the Texas Division of Emergency Management (TDEM) and FEMA to conduct drainage studies in this region. Drainage studies are required in order to pursue additional funding for mitigation projects. The City of Everman and Tarrant County were denied funding in 2019 and in 2020. In late 2021, Tarrant County received approval for this funding to move forward with this study.

Simultaneous to these efforts, the City of Everman has also been working with the NCTCOG and Tarrant County to address transportation and drainage, specifically along Forest Hill Drive between Lon Stephenson and Shelby Rd. Following the approval from TDEM, the NCTCOG has committed to funding the expansion of this study to incorporate the region instead of just the City of Everman. As a part of these discussions, we have been working to identify potential land uses along Chambers Creek for Over Detention to assist with mitigating flooding. On October 8th, 2021, City of Fort Worth staff discussed the potential utilization of this particular property for that purpose. I have attached a copy of that e-mail to the letter ([click here](#)).

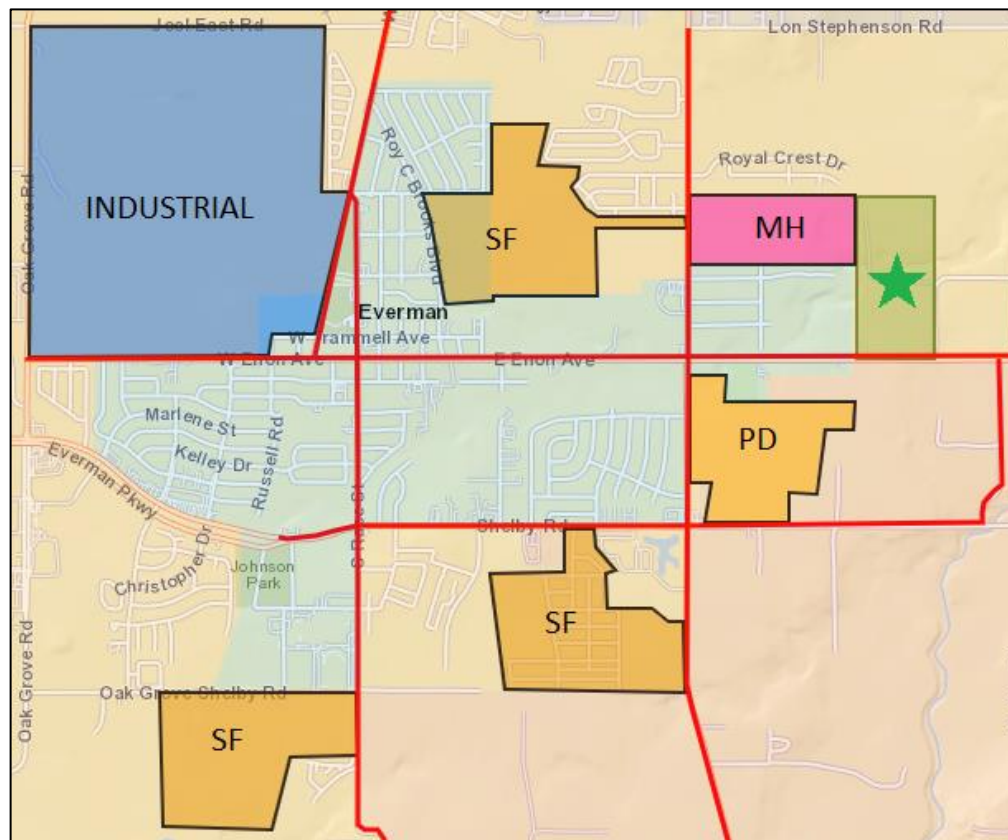
There seems to be a misconception that the City of Everman is concerned that this development will cause an increase in stormwater runoff. That is not our concern as we know that development standards and codes are in place to alleviate this concern. The concern is that



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with so much simultaneous development occurring in this region, we are quickly losing opportunities to adequately address potential mitigation projects in this region as land opportunities along Chambers Creek continue to dissipate.



*(Current Approved Developments immediately adjacent to Everman)*

To help understand the magnitude of the flooding concern in this region, we have put together a brief two-minute video clip for your review. You can view the video here: <https://youtu.be/NhbPipq3zqo>. The video and images show the Everman Cemetery completely underwater, dramatically affecting nearby businesses like Bean Electric and Hickory Stick BBQ. All of these locations are immediately adjacent to the property being considered on this application. In 2018, residents along Southway Drive had to be rescued from their homes by First Responders. I hope after reviewing this short clip, you understand our deeply rooted concerns related to flooding and working towards plausible mitigation projects.

## **Transportation Impact**

There are concerns about the impact these many developments will have on the transportation system in this area. Currently, the City of Everman is working with NCTCOG and Tarrant County to address the widening of Forest Hill Drive from Lon Stephenson to Shelby Rd. However, there are no



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plans, and there have been no discussions between the City of Fort Worth and Everman regarding any potential improvements along Enon Avenue or Anglin Drive. Both of these road systems are undersized for the already approved developments in this region and need addressing. There are also concerns related to pedestrian traffic as there are no shared paths or sidewalks on most of the streets in this development area. Below are pictures of the current traffic conditions on Forest Hill Drive during daytime school hours. The images depict traffic congestion for miles in either direction. This is a daily occurrence.



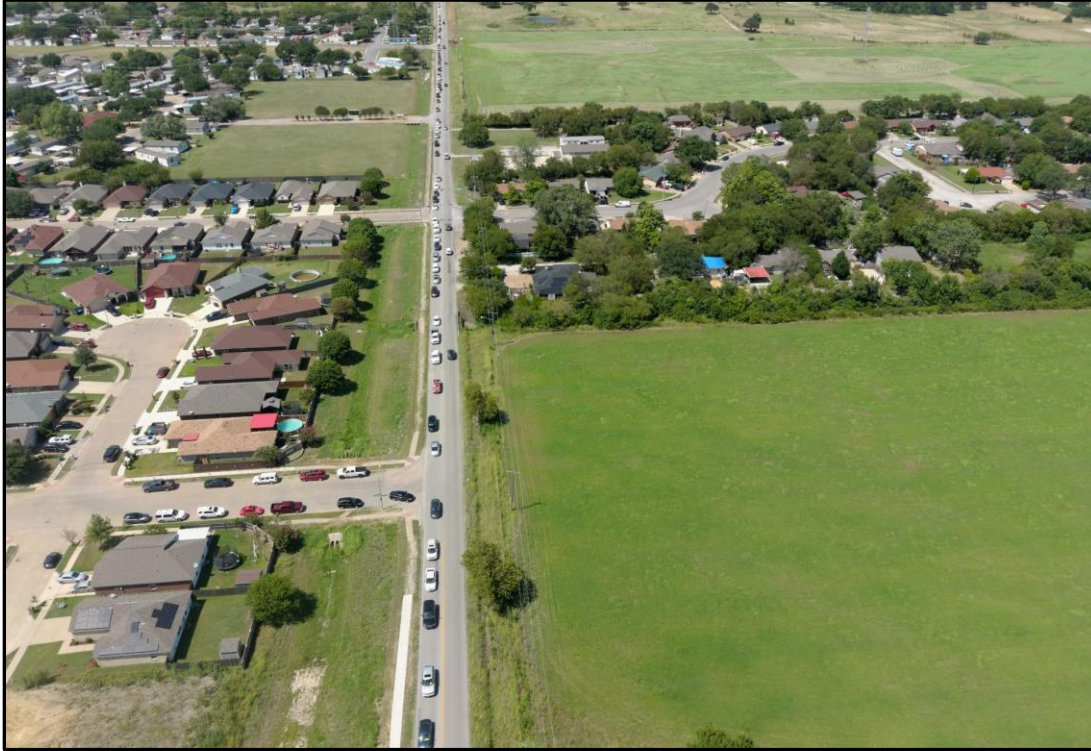




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## Affordable Housing

This development markets itself as an affordable first-time home-buying option. The firm claims its Manufactured Homes do not depreciate like other Manufactured Homes. They state that they have seen their homes increase in value; however, that is only based on data since 2019 while the real estate market in Texas has seen unprecedented appraisals and increases across the board over the past three years. Furthermore, they advised their turnover rate has been less than 2%. There is concern that the claim of these homes appreciating is an unfounded statement and needs further evaluation. Furthermore, the purchaser does not own the actual land the home is sitting on and must continually lease that land from the developer at an additional cost. At the August 10th Zoning Commission Meeting, First Step Homes advised the lot rent varied between \$500 - \$700 per month and that these homes would be sold near the \$100,000 mark on a 15-year mortgage. This means that the resident would be paying (assuming a 5% interest rate) approximately \$800 per month. This translates to approximately \$1,300 - \$1,500 per month. Even once the mortgage is paid off, the leasing of the lot is continual and will likely increase as the market demands.

For comparison's sake, quick research of home sales within this area indicates that the proposed project does not necessarily offer a more affordable monthly option than a Single Family (3BR/2BA) Home. Below, we have listed two examples of these homes, which, if purchased on a traditional 30-year mortgage, would cost approximately \$1,300 - \$1,400 per month. The purchase of a conventional single-family home offers a better investment to the purchaser, larger lot space, and limits impact and density on the local infrastructure.

**\$230,000** 3 bds | 2 ba | 1,219 sqft

100 Coury Rd, Everman, TX 76140

● House for sale | Zestimate®: \$237,400

Est. Payment: \$1,328/mo

**\$229,900** 3 bds | 2 ba | 1,275 sqft

**Price cut: \$10K** | 508 Smith Ave, Everman, TX 76...

● House for sale | Zestimate®: \$241,042

Est. Payment: \$1,328/mo

Furthermore, this particular region of Tarrant County is over inundated with low-income housing opportunities. Below is a map provided by Housing and Urban Development (HUD). The red indicates the proposed project location on this map, while the purple shaded areas indicate current Qualified Census Tracts.

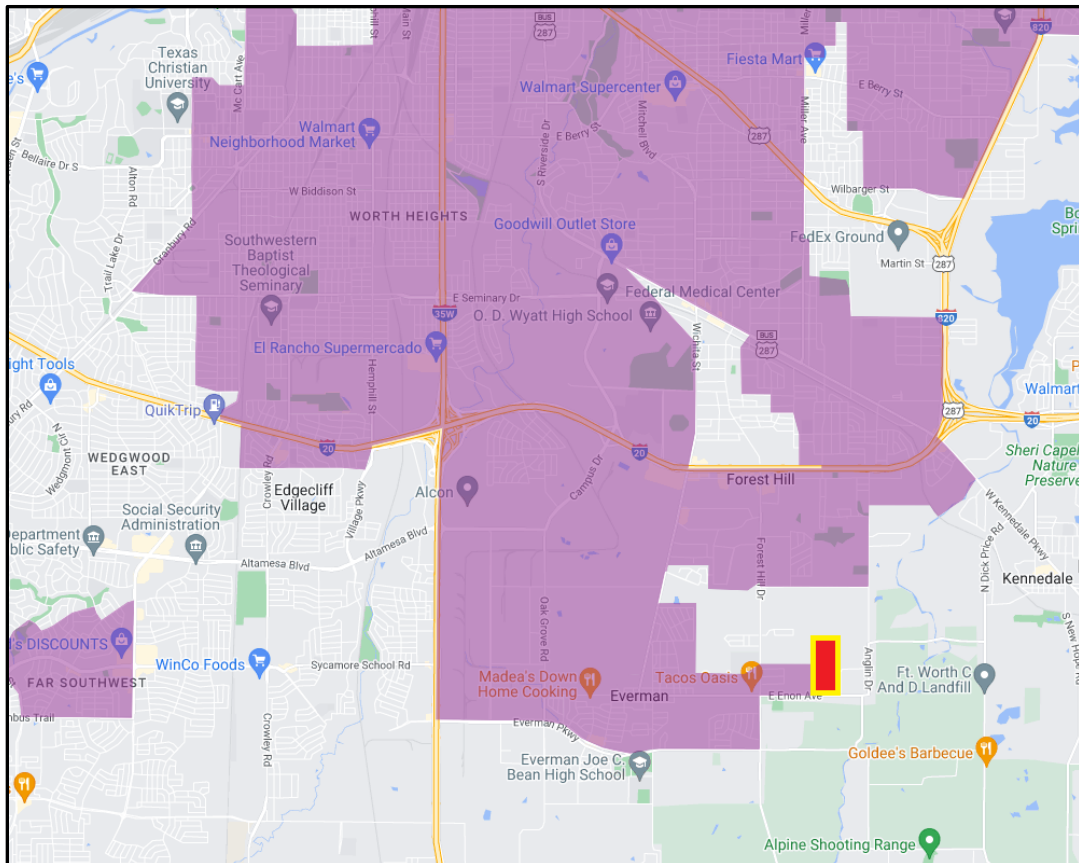




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*(Qualified Census Tract Map from Housing and Urban Development)*

According to the 2019 Census, The City of Everman's poverty rate is 20.4%, which is more than double the county-wide poverty rate, and approximately 9% more than the City of Fort Worth's poverty rate. The average median income for an individual in Everman was \$23,480, one of the lowest median incomes within Tarrant County. First Step Homes advertises that two individuals making a combined \$60,000 will qualify to purchase one of their homes. The median income for an individual in this area does not qualify to purchase one of these homes.

Since I took office as the City Manager in 2020, these issues became my top priority. Affordable Housing options are overabundantly available within this region. What is needed is proper economic development. The City of Everman has been striving to take a different approach in this region by providing adequate development and increasing quality job opportunities within this region. Working with the community and community stakeholders to provide avenues for citizens to obtain these jobs.

The location of this proposed development is in an area that is practically a food desert. This area offers few services traditionally needed for low-income housing, such as transportation. The solution is not to build more "affordable housing". The answer is to address the needs of those that are already here.



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## Conclusion

On August 9th, the day before the second Zoning Hearing, the developer requested a meeting with the City of Everman. During this meeting, the City of Everman highlighted these concerns, which the developer stated they understood. We expressed that the City of Everman would be more inclined to support this project if the application and proposal were for Planned Development rather than Manufactured Housing. Planned Development would require site plan approval before consideration of the change. The reason is that the developer could work with the City of Fort Worth, Everman, and Tarrant County to address some of these concerns while continuing with development simultaneously. However, if approved as Manufactured Housing, then the developer, by right of entitlement, will not be required to address these concerns listed in this letter. Furthermore, suppose this zoning change is approved, and this particular developer does not proceed with development. In that case, the next developer may not be inclined to work with municipalities and may also claim the right of entitlement due to the property already being zoned MH. The developer did not wish to pursue a Planned Development route as it would delay the agreements already in place to purchase the property.

The City of Everman is undoubtedly not against development. To my knowledge, the City of Everman has never officially opposed any development by the City of Fort Worth previously. The City of Everman supports development as we work on multiple actions ourselves. However, the City of Everman does not support a supposed "Affordable Housing" development on this particular tract of land where the flood-prone Chambers Creek flows directly through the middle.

I truly appreciate your time and consideration as I know it is valuable. I hope you understand our position and concerns, ultimately denying this request. Please do not hesitate to contact me directly if you should have any questions or concerns.

Very Respectfully,

A handwritten signature in black ink, appearing to be "C. W. Spencer".

C. W. Spencer  
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Everman, Texas 76140  
[cspencer@evermantx.net](mailto:cspencer@evermantx.net)  
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**Craig Spencer**

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**From:** Dyke, Jennifer M <Jennifer.Dyke@fortworthtexas.gov>  
**Sent:** Friday, October 8, 2021 1:05 PM  
**To:** Joseph J. Jackson; Edith Marvin; Kelp, Brandi  
**Cc:** Davis, Clair  
**Subject:** land just downstream of Everman- 4401 E Enon Ave

Joseph & Edith-

I wanted to understand if you are interested in discussing the Subject tract with us.

I got a call today from the owner of 4401 E Enon (see screenshot below- tract in red) just downstream of Everman. He is interested in doing something with his land other than developing it and would like to keep it natural.

While this is downstream of Everman, I thought if y'all are considering US conveyance improvements to help mitigate flood risk in Everman that the property could potentially be used as DS detention to mitigate these improvements. ***Where are y'all at with your planning/mitigation evaluation? If this a tract that interests you?***

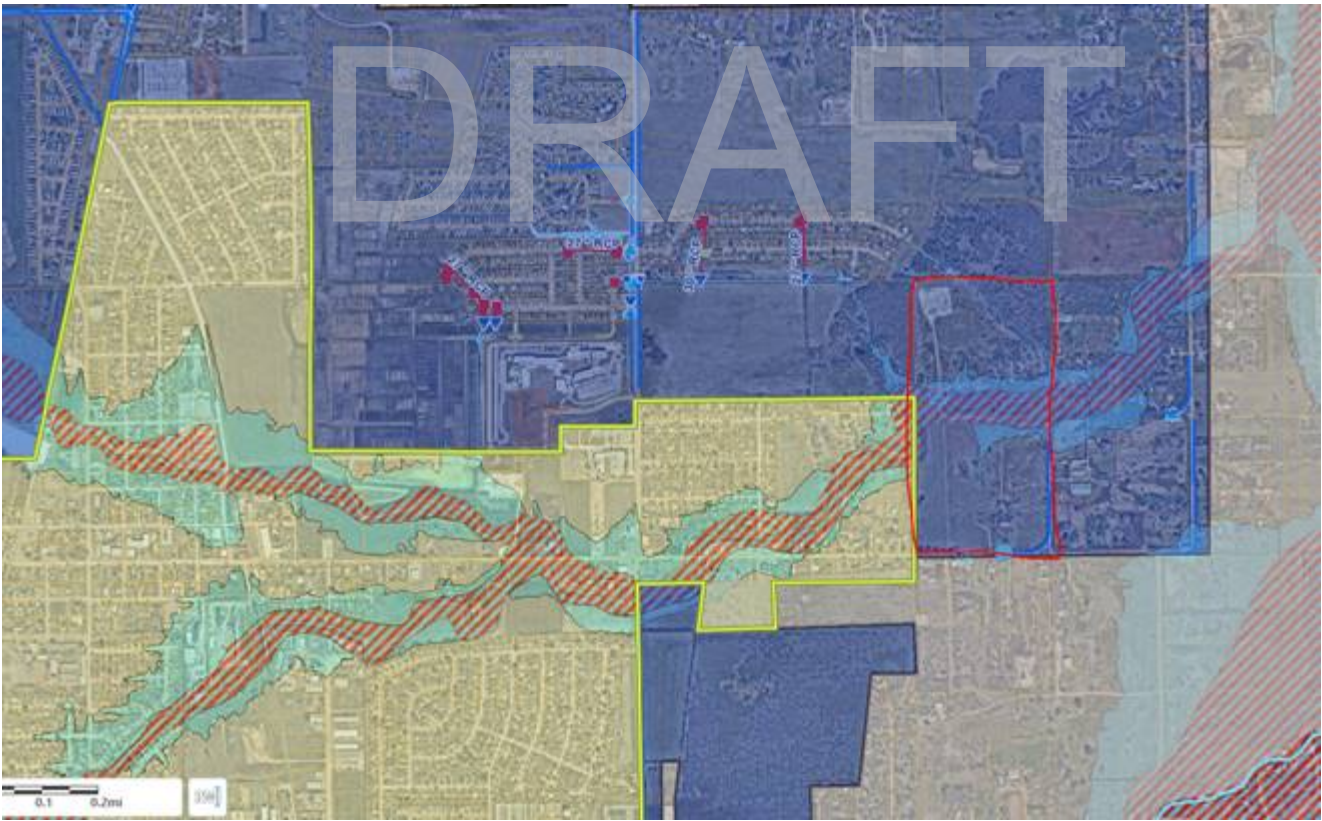
We will also take a look at this from an Open Space Conservation Program perspective and see what the priority is to see if it might be something we may want to pursue. Or depending on your interest, if there could be a partnership opportunity here.

Thanks,  
~Jennifer

*Yellow- city of Everman*

*Blue- City of FW*

*Red outline- 4401 E Enon owned by Mr. George Moore*





**Jennifer Dyke, CFM**

Stormwater Program Manager  
Transportation and Public Works Department  
Stormwater Management Division  
City of Fort Worth  
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*City of Fort Worth — Working together to build a strong community.*



**I value my performance---**Feel free to contact my Supervisor  
[Gregory.Simmons@fortworthtexas.gov](mailto:Gregory.Simmons@fortworthtexas.gov)