

January 13, 2020

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County of Los Angeles  
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Los Angeles, CA 90012  
Transmittal of five (5) pages to: [cchung@planning.lacounty.gov](mailto:cchung@planning.lacounty.gov)

Subject: Comments by the Acton Town Council on the Proposed Revision to the Draft Interim Housing Ordinance to Authorize Homeless Shelters (Interim Housing) on A1 and A2 Zoned Properties.

References: The Draft Interim Housing Ordinance.  
Announcement of Proposed Revisions to Draft Ordinance at the October 30, 2019 Meeting of The Association of Rural Town Councils.  
The Draft "Homeless Plan for Unincorporated Antelope Valley" Prepared by Shelter Partnership

Dear Ms. Chung;

The Acton Town Council has convened several public meetings to discuss the proposed revision to the draft Interim Housing Ordinance ("draft ordinance") which will authorize homeless shelters on A1 and A2 zoned parcels, and we have met with Shelter Partnership and reviewed the Draft "Homeless Plan for Unincorporated Antelope Valley" that they prepared. Through these efforts, we have compiled a number of comments and concerns which are set forth below. However, we offer the following preliminary comment:

The Acton Town Council recognizes the very real and pressing need to address homelessness and the plight of individuals experiencing homelessness. We also understand that homeless advocates and urban municipalities have asked the County to act urgently to facilitate shelter construction to house the homeless in non-urban areas regardless of whether services, medical facilities, transportation infrastructure, or job training resources are available. It seems that the County is inclined to accede to these requests because the draft Interim Housing Ordinance removes virtually all restrictions and conditions on homeless shelters, and DRP now proposes to authorize homeless

shelters in A1 and A2 zones within rural residential communities without requiring them to provide any support services. The Acton Town Council does not agree with the direction that the County appears to be taking to address homelessness; it is our belief that the solutions which are developed to address homelessness in Los Angeles County must be comprehensive to ensure that they "work" for everyone *including the homeless*. And, while homeless advocates and the County may benefit from the expeditious and unrestricted development of homeless shelters in rural areas by providing the County with more places in which to "warehouse" individuals experiencing homelessness, the homeless themselves will not benefit because rural areas lack the services, medical facilities, transportation infrastructure, training resources and job opportunities that the homeless so desperately need. The County's homelessness program must go beyond merely *housing* the homeless and achieve the higher and harder goal of *helping* the homeless. The Draft Interim Housing Ordinance does not achieve this higher and harder goal, and it is not the right solution for either the homeless or the residents of Acton.

The Acton Town Council's specific recommendations and concerns with the County's proposal to authorize homeless shelters on A1 and A2 lands are set forth in bullet form below. Please note that the comments and concerns that we previously submitted to the Department of Regional Planning ("DRP") on October 10, 2019 regarding the Interim Housing Ordinance are incorporated herein by reference.

- Any revisions to the draft ordinance that authorize homeless shelters in A1 and A2 zones must include additional provisions that similarly authorize homeless shelters on RA, R1, R2, and R-C zones and any other residential zone that is set forth in the Los Angeles County Code. This will facilitate the widespread development of homeless shelters in unincorporated areas throughout all five supervisory districts. It will also preclude an inappropriate overconcentration of homeless shelters in the rural areas of the Fifth Supervisory District, and it will prevent mass relocations of homeless individuals from urban and suburban areas to rural areas. This recommendation is motivated by the simple and undeniable fact that, if it is appropriate to place homeless shelters in rural residential neighborhoods, then it is equally appropriate to place homeless shelters in urban and suburban residential neighborhoods. The Acton Town Council is *particularly* committed to this recommendation because R1, R2, RA, and R-C zones are located close to transit opportunities, medical and mental health facilities, and job opportunities, thus individuals experiencing homelessness will benefit far more if shelters are permitted in R1, R2, RA, and R-C zones rather than A1 and A2 zones. Correspondingly, if the County is truly interested in *helping* the homeless rather than just *warehousing* them, then it will authorize homeless shelters on R1, R2, RA, and R-C zones and not just on A1 and A2 zones. And, if the County authorizes homeless shelters in A1 and A2 zones and not in R1, R2, RA and R-C zones, then that will send the clear and unmistakable message that the County of Los Angeles intends to solve its urban homelessness crises by relocating individuals who are experiencing homelessness from urban and suburban areas to rural areas in general, and the Fifth Supervisory District in particular.

- In meetings with DRP staff, the Acton Town Council was informed that the intent of the Interim Housing Ordinance is to accommodate homeless populations in areas where they are currently living and not create circumstances in which homeless individuals within urban and suburban areas are relocated to rural areas (and vice versa). However, when the Acton Town Council asked what provisions will be included in the ordinance to achieve this intent and thereby restrict shelter development in a manner that accommodates only local homeless populations, no answer was provided. The Acton Town Council does not perceive how DRP's stated intent of the Interim Housing Ordinance will be achieved, particularly if it is revised to authorize homeless shelters in A1 and A2 zones but not in RA, R1, R2, and R-C zones. In fact, it seems that such a revision will serve a contrary purpose because it will facilitate the rapid expansion of numerous homeless shelters throughout the 1,000+ square miles of agriculturally zoned land within unincorporated Antelope Valley. In other words, if homeless shelters are authorized on A1 and A2 lands and not on RA, R1, R2, and R-C lands, then the majority of new homeless shelters will be constructed in the Fifth Supervisory District due to the high availability of relatively low-cost agricultural land. This in turn will result in the transfer of large homeless populations from urban areas to rural agricultural communities in the Antelope Valley in a manner that is utterly contrary to what DRP asserts is the stated intent of the Interim Housing Ordinance.
- It is our understanding from meetings with "Shelter Partnership" that Acton is among the communities that have the lowest number of people experiencing homelessness in the Antelope Valley. Therefore, the need for homeless shelters within the Community of Acton is relatively small if it is indeed the County's intent to accommodate homeless individuals in the areas where they currently live. Correspondingly, if the Draft Interim Housing Ordinance is revised to allow homeless shelters on A1 and A2 lands, then it must also include provisions which restrict both the number of shelters and the number of shelter occupants within a community to ensure that the total shelter capacity within a community is commensurate and consistent with the existing local population of homeless individuals within the community. If such provisions cannot be developed, then homeless shelters cannot be authorized on A1 or A2 lands.
- Currently, the County Code limits the number of occupants in a homeless shelter to less than 30 on lots that are less than 1 acre in size. [22.140.300(B)]. The Draft Ordinance deletes this restriction and removes all limitations on homeless shelter occupancies. The Acton Town Council is troubled by this, particularly in light of DRP's proposal to allow homeless shelters on A1 and A2 lands. It is essential that shelter occupancies be limited to avoid substantial environmental problems within rural agricultural communities where infrastructure is non-existent. These problems include, but are not limited to, the efficacy of septic system operation, security, water quality, water availability, and emergency access and egress. Therefore, the Acton Town Council contends that no homeless shelter should be permitted on A1 or A2 zoned property unless it "fronts" on a County maintained road AND is connected to a municipal sewer system AND is served by a municipal water system. If the draft ordinance is revised to allow homeless shelters on A1 and A2 parcels without this restrictive condition, then

we expect that the Environmental Impact Report prepared pursuant to the California Environmental Quality Act ("CEQA") for the Interim Housing Ordinance will assess and fully mitigate all potential water quality, water availability, access, emergency response, and septic system impacts.

- Currently, the County Code mandates that "There shall not be an over-concentration of homeless shelters in the surrounding area" [22.140.300(C)]. The Draft Ordinance deletes this restriction and thus eliminates the only mechanism available for controlling the number of homeless shelters developed within a rural community. The Acton Town Council is troubled by this, particularly in light of DRP's statement that the intent of the Interim Housing Ordinance is to accommodate homeless populations in areas where they are currently living and not create circumstances in which urban homeless populations are relocated to rural areas. If the Draft Ordinance is revised to authorize homeless shelters on A1 and A2 lands, then some sort of controlling provision must be included to ensure that rural communities are not burdened with a disproportionately high number of homeless shelters. If no such provision is included, then homeless shelters cannot be authorized on A1 or A2 lands.
- If the County proceeds with the authorization of shelters on A1 and A2 lands, then the Environmental Impact Report prepared for the Interim Housing Ordinance must address the health and safety impacts posed by homeless shelter developments on rural residents. This is because single family residences comprise the majority of developments on A1 and A2 lands in Acton, and the placement of homeless shelters adjacent to such uses poses certain risks. For instance, the Acton Town Council understands that homeless shelters do not require occupants to abstain from drinking or drug use (though they do not allow alcohol or drugs on the premises); this means that occupants who wish to use drugs or alcohol will partake of these activities on adjacent properties. This will pose immediate and substantial hazards to surrounding residents. It is further noted that the Draft Ordinance does not even require on-site management of any homeless shelter that has less than 6 occupants [22.140.180(B)], and it does not require any shelter to provide any mental health services or drug treatment assistance or counseling support. The ordinance lacks essential requirements addressing oversight of, and services to, the occupants of homeless shelters, thus it substantially magnifies risks to rural residents in remote communities where there is no continual police presence. The Acton Town Council is aware that "Part 1" crimes committed by persons experiencing homelessness in the City of Los Angeles increased substantially between 2017 and 2018<sup>1</sup> (robbery increased by 64%, rape increased by 78%, aggravated assault increased by 56%, and larceny increased by 48%) thus it is a material fact that crime rates will increase if homeless shelters which lack services and oversight are authorized in rural residential neighborhoods within remote agricultural areas. This is a potentially significant adverse environmental impact that must be addressed and fully mitigated before the County can move forward with any plans to authorize homeless shelters on A1 and A2 lands.

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<sup>1</sup> Table 1a of "The Los Angeles Police Department's 2018 Fourth Quarter Report on Homelessness" issued March 7, 2019 available here: [http://www.lapdpolicecom.lacity.org/031219/BPC\\_19-0073.pdf](http://www.lapdpolicecom.lacity.org/031219/BPC_19-0073.pdf)

Finally, the Acton Town Council offers the following comments on the changes that the Draft Interim Housing Ordinance makes to principal uses for industrially zoned property. In an email sent to the Acton Town Council from DRP on November 18, 2019, it was clarified that homeless shelters are considered "service uses" and not "residential uses" and that "The draft ordinance proposes changing the review of shelters from by right to CUP in M-1.5 and M-2, essentially making the review of shelters more restrictive in those zones." This clarification confirms that the Draft Interim Housing Ordinance imposes more "service use" restrictions on "heavy manufacturing" M-1.5 and M-2 zones than on "light manufacturing" M-1 zones because it requires a CUP for shelters proposed in M-1.5 and M-2 zones, but it only requires a site plan review for shelters proposed in M-1 zones. The Acton Town Council has reviewed all the "service uses" set forth in Table 22.22.030-B of the County Code for M-1, M-1.5, M-2, and M-2.5 zones and we note that, in every case, the restrictions imposed for service uses in M-1.5 and M-2 zones are always *less than or equal to* the restrictions imposed in M-1 zones. In other words, service use restrictions imposed on M-1 zones by the existing code are always more than those imposed on M-1.5 or M-2 zones. Yet, and for reasons that are not clear, the Draft Interim Housing Ordinance contradicts this established zoning paradigm because it imposes more restrictions on shelters in M-1.5 and M-2 zones than it does on shelters in M-1 zones. This contradiction can only be corrected by amending the Draft Interim Housing Ordinance to require a CUP for shelters in M-1 zones in addition to M-1.5 and M-2 zones. The Acton Town Council respectfully requests that this change be reflected in the next draft that is released for the Interim Housing Ordinance.

The Acton Town Council welcomes the opportunity to discuss the issues set forth above with County staff; you can contact us at [atc@actontowncouncil.org](mailto:atc@actontowncouncil.org).

Sincerely,



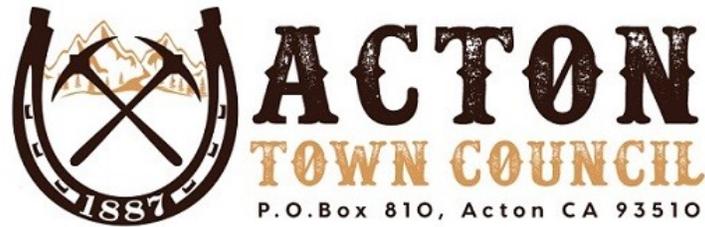
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Jeremiah Owen

President,

The Acton Town Council

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September 10, 2019

Transmittal of six (6) pages to: [cchung@planning.lacounty.gov](mailto:cchung@planning.lacounty.gov)

**Subject:** Comments Solicited by the Department of Regional Planning from the Community of Acton on the Draft Interim Housing Ordinance.

**Reference:** The Draft Interim Housing Ordinance.  
Meeting between the Department of Regional Planning and the Community Of Acton on September 16, 2019.

Dear Ms. Chung;

The Acton Town Council appreciates the time that you and Heather Anderson took to meet with the community and discuss the numerous housing ordinances currently undergoing development, review, and approval. We understand that the County is seeking comments on the recently released draft "Interim and Supportive Housing" ordinance (referred to hereafter as "draft ordinance") which establishes interim housing for the homeless as a "by right" use on all M-1 zoned properties and a "by right" accessory use on all agricultural and industrial zoned (A-1, A-2) properties that are not already used for residential purposes. The Acton Town Council has captured the comments from the Acton community, and present them below. These comments are presented first in general terms, and then followed by more specific comments.

The draft ordinance adopts a "broad brush" approach to address the issue of where homeless shelters and interim housing facilities should be placed and, because it imposes almost no development standards on such facilities, it implicitly assumes that homeless shelters with an unrestricted number of residents can be simply placed anywhere that has the appropriate zoning. In other words, the ordinance perceives no difference between a homeless shelter for 100 people in a modified warehouse within a city that is served by municipal water and sewer facilities and has proximate access to medical care, mental health care, and drug treatment and a homeless shelter for 100 people that is placed in an

old barn on a farm or ranch located far up a dirt road which has limited water and septic facilities and absolutely no medical, mental health, or drug treatment facilities. The Acton Town Council is troubled by this "cookie cutter" stance that the draft ordinance appears to take. It is difficult to fathom why the draft ordinance does not consider it important to require that homeless shelters have adequate access/egress opportunities, especially in very high fire hazard zones ("VHFHZs") like Acton. This is particularly germane, given that the recently revised "Accessory Dwelling Unit" ordinance does not permit accessory dwellings in VHFHZs unless they are served by two access routes that are improved to county road standards. Most Acton residents are acutely aware of how important it is to plan for, and have the means, opportunity, and facilities to accomplish, the evacuation of loved ones, pets and livestock in the event of a wildfire, yet the draft ordinance does not require that homeless facilities supply any means, opportunity, or facilities to evacuate residents. It does not even require that a homeless shelter provide a reasonable access and egress route. The draft ordinance appears to acknowledge that many homeless do not have vehicles because it imposes no parking requirements, yet it does not require homeless shelters to provide adequate motive power to affect a full evacuation of the premises.

It is equally difficult for the ATC to fathom why the draft ordinance gives no thought to whether a location is adequately served by water and sanitary facilities to accommodate a seemingly unrestricted number of residents within a homeless shelter. This is particularly true in Acton, where water is limited, where there are no sewage treatment facilities, and where constructing a house on a parcel less than 5 acres in size often requires the installation of one or more monitoring wells to protect groundwater quality. Moreover, Acton lies at the headwaters of the Santa Clara River, and because our community relies on septic systems, county agencies have, for more than a decade, claimed that rural residential and equestrian uses in Acton have contaminated the Santa Clara River<sup>1</sup> (though such accusations have never been corroborated with any evidence). Given this backdrop, it is troubling that the County would propose an ordinance which paves the way for the placement of an unrestricted number of shelters having an unlimited number of residents throughout Acton with no concern for septic or water or other services.

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<sup>1</sup> In 2008, the Department of Public Health informed the ATC that they would probably not permit any more septic systems "in downtown Acton" based on the belief that they were causing high nitrate levels; no supporting evidence was provided. In 2009, County Waterworks District staff stated at a town Council meeting that animal waste in Acton was causing high nitrate levels in the river; no supporting evidence was provided. The RWQCB recently declared that development in the "upper " Santa Clara River threatens water quality and that the Agua Dulce Community is working with RWQCB on a "wellhead protection effort" [see [https://www.waterboards.ca.gov/rwqcb4/water\\_issues/programs/regional\\_program/Water\\_Quality\\_and\\_Watersheds/santa\\_clara\\_river\\_watershed/summary.shtml](https://www.waterboards.ca.gov/rwqcb4/water_issues/programs/regional_program/Water_Quality_and_Watersheds/santa_clara_river_watershed/summary.shtml)] These statements are not supported and the Agua Dulce Town Council has never heard of RWQCB's "wellhead protection effort". In a letter dated May 8, 2019 the Department of Public Works asserted that rural equestrian communities contribute "significant animal waste pollution" to the Santa Clara River but cited no study or data or evidence to support this assertion.

And, even if these concerns are addressed by strengthening the draft ordinance to limit the number of residents and address access, water availability, and septic capacity, these provisions will have little meaning because the draft ordinance imposes no compliance or monitoring provisions and it lacks revocation conditions. In other words, there is nothing to prevent a homeless shelter which is authorized for 6 residents to actually be used to accommodate 20 or 30 residents. Under such circumstances, the shelter itself should be shut down and the approved "site plan" should be revoked, but the draft ordinance includes no provisions to achieve this. In addition, the draft ordinance imposes no permitting or monitoring requirements on "by right" homeless shelters, and it does not require any county agency to routinely "follow up" with the shelter to ensure that it provides a safe and clean residential environment and is being properly managed. The draft ordinance does not impose any recordkeeping requirements to monitor whether residents stay longer than the 6-month limit that it imposes, and it certainly does not include any "backstop" provisions that will be enforced in the event a resident does stay longer than 6 months. It is axiomatic that, if an agency does not intend to implement the conditions imposed on a proposed ordinance, then it must not approve the ordinance at all.

Finally, it is respectfully pointed out that, even if restrictions are added to the draft ordinance and it is revised to include "backstop" provisions related to monitoring and revocation, there is little confidence that such restrictions and provisions will be enforced. Our lack of confidence stems from the Acton Town Council's understanding of ongoing problems with the county's existing enforcement mechanisms. For instance, there is an unpermitted and unlicensed mobilehome/RV park located on a 0.3-acre parcel in Acton that has 10 occupied mobilehome/RV "units" and no permitted septic system. This "facility" operates in clear violation of both local and state regulations, yet the county has neither shut it down nor mitigated the serious water quality impacts that it poses *even though we asked that the facility be brought into compliance nearly 11 years ago*<sup>2</sup>. This gives us little confidence that, once established, homeless shelters will continually provide the safe and clean environment that is needed to serve the county's vulnerable homeless population. Additionally, the Acton Town Council is not aware of any legal mechanism which allows the County to routinely inspect a homeless shelter once it is established as a "by right" use. In other words, if homeless shelters are established "by right", then the County will not have the means to ensure that such shelters consistently provide the clean and safe environment that is so essential to healing. Similar concerns are raised by the "Safe Parking" use established by the draft ordinance "by right". To address this concern, the County could establish a discretionary review process for authorizing shelters and safe parking, but if the County pursues this course of action, then land use issues (siting, access, water, sanitation facilities) should be incorporated in the review process. Correspondingly, it is inappropriate to adopt an ordinance that establishes homeless shelters "by right".

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<sup>2</sup> See emails dated December 8, 2008 and December 10, 2008 to DRP.

The following paragraphs provide more specific comments on the draft ordinance.

**Clear Definitions Must be Provided:** The Draft Ordinance uses several terms that are not clearly defined (and in some cases, not defined at all). For instance, the term "interim housing" is defined as "Housing in which a person who is experiencing homelessness or is at risk of experiencing homelessness may live temporarily while waiting to move into permanent housing" and it includes "shelters and transitional housing". However, the term "shelter" does not appear to be defined anywhere in the ordinance or in the County Code. Notably, Title 17 of the Code asserts that "shelters" include "tents", thus this could be construed to mean that homeless tents are in fact "shelters" which this draft ordinance authorizes "by right" on any non-residential agriculturally zoned lands in Acton.

**Shelter Occupancy Limits Must be Established:** The draft ordinance removes all occupancy limits on shelters and interim housing facilities, and it even abolishes minimum lot size requirements. This is unsettling, particularly for established rural communities where only low density, low intensity land uses are permitted. Not only must occupancy limits and minimum lot sizes be re-established in the ordinance, but the County must also require that every Site Plan Review that is conducted for a proposed shelter or other interim housing project in a rural area address whether the project size and occupancy level is consistent with the existing low density and low intensity use profile within the community. If the proposed interim housing project is not consistent with the surrounding low density and low intensity profile, then the occupancy rate of the project must be reduced to the level where it is consistent.

**Shelters Must Have Proximate Access to Essential Services:** The draft ordinance does not require shelters or other interim housing facilities to provide any services to their homeless residents. In fact, it does not even require "on-site management" unless the facility houses more than five homeless individuals. Moreover, the draft ordinance does not require that services be available within the community where the shelter or interim housing facility is located, thus it fails to address (let alone secure) the medical care, mental health care, substance abuse treatment, and advocacy services that are so essential to healing homelessness. The ATC estimates that many hundreds of acres within Acton will qualify for use as homeless shelters "by right" under the draft ordinance, yet Acton cannot provide any of the essential services that the homeless residents of such facilities require. While it is true that Acton has emergency response facilities (including a fire station and an ambulance station), it does not have any medical care or mental health care or drug treatment services. In other words, the draft ordinance will establish within Acton large and isolated residential islands of homeless individuals who are adrift without anchorage to services or other essential assistance.

**Shelters Must Have Minimum Development Standards:** The draft ordinance does not establish *any* development standards for shelters or other interim housing facilities. It does not require that shelters have running water or electricity or plumbing or even an approved sanitation system. Shelters are not required to be accessible by a County maintained road (or even any road at all). This is astonishing, given the County's normally tough stance regarding emergency access and egress for residential uses, particularly in Very High Fire Hazard Zones. The draft ordinance should be revised to include at least minimum development standards for homeless shelters and interim housing facilities.

**Interim Housing Cannot be "by right" on M-1 Zoned Properties:** Adopted planning documents firmly establish that residential uses (such as homeless shelters and interim housing) is intrinsically incompatible with industrial uses, therefore combining these two disparate "by right" uses in a single area poses a substantial land use conflict and is contrary to adopted planning policies and goals. For instance:

- The County General Plan adopts goals and policies drawing a clear distinction between industrial uses and non-industrial uses, and it firmly establish that residential uses are non-industrial uses which categorically *do not belong in industrial areas* (see page 243).
- The County General Plan adopts Industrial Development Policy ED 2.2 which explicitly directs the County to "Utilize adequate buffering and other land use practices to facilitate the compatibility between industrial and non-industrial uses". Under this GP Policy, residential uses of any kind (whether interim or not) must be buffered from industrial uses; correspondingly, all types of residential uses are barred from being established "by right" on any industrial property.
- The County General Plan adopts land use compatibility goal LU 7.1 which is intended to "Reduce and mitigate the impacts of incompatible land uses, where feasible, using buffers and other design techniques." Establishing any type of residential uses (including interim or temporary residential uses) as a "by right" use on industrial lands runs afoul of this General Plan Policy that is clearly intended to separate residential uses from industrial uses.
- The adopted General Plan directs the County to add development standards to Title 22 to "buffer residential and industrial uses" in an effort to address intrinsic incompatibilities between residential and industrial uses and mitigate conflicts between them [page 274]. This plain and unambiguous language makes it clear that the establishment of residential uses "by right" on industrially zoned lands (as proposed in the draft ordinance) is utterly contrary to the foundational land use principals upon which the County General Plan is based.
- The Antelope Valley Area Plan (the "AV Plan") establishes quite clearly that M-1 zoned properties are reserved for ***non-residential purposes*** and are established to accommodate light manufacturing, assembly, warehousing and distribution uses [see

Table L-1] as a means of serving the daily needs of rural residents and providing local employment opportunities [see Page LU-3]. Therefore, "repurposing" M-1 zoned lands for "by right" residential uses *is not permitted under the adopted AV Plan*. Moreover, the argument that interim housing is only "short-term" and therefore using M-1 property for interim housing purposes would merely be a temporary circumstance does not hold water; while individuals may reside in the interim housing facilities on a temporary basis, the interim housing facility itself will be permanently established "by right" and thus remain operational to serve the homeless population in perpetuity.

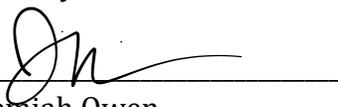
**There Should be no Changes to Development Standards for Domestic Violence**

**Shelters on A1 and A-2 Lands:** Currently, domestic violence shelters are permitted in A1 and A2 zones with a site plan review as long as the shelter has less than 30 adult residents on parcels less than 2 acres in size and meets other requirements. This restriction (along with all other development conditions) is eliminated by the draft ordinance. In fact, the draft ordinance allows an unlimited number of people to reside at a domestic violence shelter on A1 and A2 parcels regardless of parcel size, irrespective of whether the shelter has sufficient access and egress opportunities (particularly in Very High Fire Hazard Zones) and without consideration of whether the property is adequately served with water and sewage facilities. This revision is unacceptable because development standards for domestic violence shelters should not be eliminated, rather they should be strengthened to ensure adequate access opportunities and proper drinking water and sanitation facilities.

Finally, the ATC seeks clarification on the applicability of "Supportive Housing Facilities"; the ordinance indicates that the Supportive Housing Facility regulations only apply in zones that allow multifamily residential use and mixed use [see Section 22.128.020], which presumably means that Supportive Housing Facilities will not be permitted in A-1 or A-2 or M-1 zones since these zones do not permit multi-family housing uses. Is this correct? If so, it seems rather contradictory for the county to restrict supportive housing facilities to just those zones that authorize multifamily uses, and at the same time, authorize an unrestricted number of homeless shelters and interim housing facilities without limits on the number of residents on A1 and A2 and M1 properties and without any requirement for proximate medical or mental health services and without any development standards related to access and without even requiring adequate water or sewage facilities.

The ATC looks forward to working with you on this ordinance in future.

Sincerely,



Jeremiah Owen

President,

The Acton Town Council