

## Ahrens, Melissa

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**From:** kerri fiero <kerrilf@juno.com>  
**Sent:** Friday, December 10, 2021 7:23 PM  
**To:** Ahrens, Melissa  
**Subject:** Northwest Bible Training Center regarding an addiction recovery center wanting to expand their business on Beavercreek

**Warning: External email. Be cautious opening attachments and links.**

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Regarding an addiction recovery center wanting to expand their business on Beavercreek land zoned Farm Use Only.  
land zoned Farm Use Only.

The Hamlet and then Clackamas County Planning Committee have overwhelmingly denied their petition for a land use exception that would allow close to 30 more unregulated addicts to live on the property, dorm style, in their barn. People that could cause problems.

Bluhm Rd residents and our Beavercreek neighbors have rallied against this. But Northwest Bible Training Center are distorting facts and misrepresenting our opposition. There is absolutely no evidence that this addiction group should qualify for a land use exception. Not only is it bad for Bluhm Rd residents and Beavercreek, but there is zero proof that they can't perform their business elsewhere, in an urban setting with infrastructure that supports an addiction recovery center. I could not agree with you more. It is zoned farming only for a reason. Let's get a farmer in there and preserve our rural heritage. For me it is about the fact that it is wildly against the zoning laws. They want to be able to house 31 people on the property. We want to retain the rural character and protect our zoning laws. unfortunately these folks just disregarded all of the zoning laws, got caught, and are now asking for forgiveness. there are so many reasons to choose from! Zoning, precedence, infrastructure, bad actors... but for me, the reason I'm most against the land use exception is because it's bad for Beavercreek. We are a rural Hamlet and want to stay that way. A Portland drug addiction center buys Farming Only land in Beavercreek and immediately sets out to expand their operation, in violation of land agreement. They do not serve our community, nor is there any reason that precludes them from operating elsewhere. But because they want to, they could chip away at the sanctity of our farming land. It's egregious. For me it boils down to precedence - if the county allows this to happen on this particular farm land, they must allow ALL properties that are zoned agricultural or timber or whatever to break from the zoning exceptions and put in facilities housing dozens of people on their rural properties. But if we do that what is the point of having zoning laws in the first place? I love the Beavercreek area for the farmland and "free" feeling. I agree the center should go elsewhere. I just always try to stand up for people who need help.... but, I think this center can go elsewhere. It's a bad idea for Beavercreek and against zoning they should not have even asked this is a rural community and we want to keep it that way.

Sincerely  
Kerri Fiero

Sent from [Mail](#) for Windows

Exhibit 29  
Z0208-21-CP

**Ahrens, Melissa**

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**From:** Vince Wright <frizbijack@gmail.com>  
**Sent:** Saturday, December 11, 2021 8:55 AM  
**To:** Ahrens, Melissa  
**Subject:** Z0208-21-CP

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To Melissa Ahrens, I would like to have my opposition to this drug addict barn added to the correspondence. I have lived in Beavercreek for most of my 54 years and feel that this would very negatively affect our community.

Thank you for letting me voice my oppinion.  
Vince Wright

Exhibit 30  
Z0208-21-CP

## Ahrens, Melissa

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**From:** Jennifer Gaytan <jennifergaytan@gmail.com>  
**Sent:** Tuesday, December 14, 2021 10:37 AM  
**To:** Ahrens, Melissa  
**Subject:** Planning file: Z0208-21-CP

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Melissa Ahrens  
Email: [mahrens@clackamas.us](mailto:mahrens@clackamas.us)

Planning file: Z0208-21-CP  
Applicant: Mission Teens., North West Bible Training Center

Dear Melissa Ahrens

As a resident of Beavercreek, I'm deeply upset by the group, North West Bible Training buying land and trying to rezone it here for their use. Already the new buildings across from the high school are going to bring more traffic to this area. The streets are not equipped for this here.

I've noticed an uptake in crime in my area as well and I'm wondering if this is because of this property and what they are allowing there.

I feel this kind of service is best served in the city. There these people can find jobs and transportation to get to and from these jobs.

This is a rural community that has a lot of farming animals and outbuildings that we need to protect.

Thank you for continuing to vote no on this zoning change and I pray that they stop using the land illegally.

Thank you.

Exhibit 31 Z0208-21-CP
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## Ahrens, Melissa

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**From:** broke\_n\_soul <broke\_n\_soul@yahoo.com>  
**Sent:** Tuesday, December 14, 2021 9:07 AM  
**To:** Ahrens, Melissa  
**Subject:** Concerning proposal plan ZO208-21-CP

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I live within a mile from the "Bible camp".

I do not think this proposed idea is a good idea for this facility. They have lied and changed their stories too many times to count during the hearings.

They say no traffic, but traffic has increased since last year exponentially. We hear screams sometimes from that direction at weird hours 12am-5am. Sometimes loud banging noises.

Talking with neighbors near me, we've begun to notice our well water beginning to show signs of getting low. We are beginning to investigate other means of storing water. We may have to have water trucked in weekly for our live stock, if it gets too low or worse going dry in the summer.

Also, where does human waste of 31 people go? Humans on average produce 14-17 ounces of waste per day. Or 6lbs per week(?) 320lbs per year.

So  $31 \times 320 = 9,920$  lbs per year.... where does it all go? I'm down hill, there is no sewer out here, there is no city water...out here to supplement or have as back up.

Listening to testimonial from the residents of the Bible camp they say they help neighbors....?  
What neighbors? Not me, not the 6 neighbors around them or the ones down the road.

Maybe they are from a good organization, but they don't seem to be good people at this location. Neighbors next to them are in fear of retribution or some type of retaliation if they say anything. The patients at the "Bible camp" seem to be spiteful and defensive when they talk at hearings.

They say that they haven't had police called to their location for incidents? How did they deal with people screaming at night or when a neighbor discovered someone walking around looking for the Bible camp, but got lost 2 Miles by rd or a mile if you trespass.

Approving a hotel or rezoning in our area is not a good idea at this time.

I find it interesting how a few patients have spoken in the forums after they got discovered.

I do not like how they went about sneaking around until they got caught, running a rehab center without notification.

Even a local has has voiced their opinion in the beavercreek forum about positive treatment through their organization or like organization. They even have concerns about how this facility has gone to extreme measures to rezone to fit their own needs to be legal.

Everything about this facility, has a foulness about it.

Exhibit 32 ZO208-21-CP
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It's like them saying: hey we got caught and now we will change it to fit our agenda.

Concerned resident near the "Bible camp".

Sent from my Verizon, Samsung Galaxy smartphone

## Ahrens, Melissa

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**From:** Amber Kaney <amberk1121@live.com>  
**Sent:** Thursday, January 6, 2022 11:58 PM  
**To:** Ahrens, Melissa

Warning: External email. Be cautious opening attachments and links.

Melissa Ahrens  
mahrens@clackamas.us  
Re: Z0208-21-CP

January 6, 2022

To Whom It May Concern,

I am a homeowner in Beavercreek, and I am writing to oppose Northwest Bible Training Center's application for a land-use exception in my community.

The proposed land use exception is bad for Beavercreek because [It sets a dangerous precedent for Clackamas County It will invite undesirable elements to the area It will call congestion and traffic All of the neighbors oppose it It does not serve the community They are already acting out of alignment with land use agreement There is no existing infrastructure to support it Their operation is already affecting the water table They are an unregulated operation with no governmental oversight It would change the integrity of Beavercreek Home values will be negatively impacted by proximity to an addiction treatment center ].

Please preserve the integrity of our community and vote against this proposal.

Sincerely,  
Amber Kaney

Exhibit 33 Z0208-21-CP
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## Ahrens, Melissa

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**From:** Nicole Coon <nicole@matrix-video.net>  
**Sent:** Thursday, January 6, 2022 2:29 PM  
**To:** Ahrens, Melissa  
**Subject:** Re: Z0208-21-CP

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Re: Z0208-21-CP

Nicole Coon  
23621 S. Upper Highland RD  
Beavercreek OR 97004

January 6th, 2022

To Whom It May Concern,

I am a resident of, and business owner in Beavercreek, and I am writing to oppose Northwest Bible Training Center's application for a land-use exception in my community. The proposed land use exception is bad for Beavercreek because this area is zoned for agricultural and timber use. This type of land use with increased traffic and residency feels like a direct conflict to the surrounding area and will no doubt set a precedence for the surrounding area to be up for commercial use.

Please preserve the integrity of our community and vote against this proposal.

Sincerely,

Nicole

Nicole Coon, President  
Matrix Video Production Inc.  
ph: 503-913-0818  
[www.matrix-video.net](http://www.matrix-video.net)

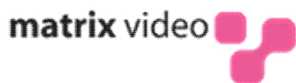


Exhibit 34  
Z0208-21-CP

## Ahrens, Melissa

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**From:** cherievancommercial@gmail.com  
**Sent:** Thursday, January 6, 2022 6:39 PM  
**To:** Ahrens, Melissa  
**Subject:** Beavercreek Concern Resident

**Warning: External email. Be cautious opening attachments and links.**

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To Whom it may concern;  
Cheri Evan  
22317 S Lewellen Rd  
Beavercreek, OR 97004  
Beavercreek resident since 2001  
Jan. 6th 2022

I also oppose the NW Bible Training Center. My concern: The land where they want to do this has EFU zoning. EFU is exclusive farm use, their use is not a farm use. More and more of our beautiful farm land is being eaten up. This use seems like a good cause but do it in another zone, not EFU. These zones are setup for a reason to protect the farm land we have left. The county needs to abide by them. Their use has nothing to do with farm land use. We have lived here since 2001 a long time resident and I want to keep our area the beautiful farming community it is.

Thanks you.

Please do not publish my home address.



Cheri Evan  
Commercial Principial Broker  
Keller Williams Portland Elite  
12901 SE 97<sup>th</sup> Ave Suite 300  
Clackamas, OR 97015  
503 970 5432  
Licensed in Oregon Since 1997



Exhibit 35  
Z0208-21-CP

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dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone  
503-970-5432 Cheri Evan

## Ahrens, Melissa

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**From:** dirk schlagenhauser <dirkintl@hotmail.com>  
**Sent:** Thursday, January 6, 2022 9:11 AM  
**To:** Ahrens, Melissa  
**Subject:** Planning file Z0208-21-CP

Warning: External email. Be cautious opening attachments and links.

Good morning Melissa

Please include this opinion letter in the record. Thank you. !!

Planning file Z0208-21-CP

Good day Commissioners

Thank you for taking the time to read my thoughts on this agenda item.

Before I start I wanted to mention that I am currently serving as a member of the Oregon City Planning Commission but these thoughts are my personal thoughts and in no official capacity as a planning commission member.

Ok I know you get a lot of these letters so I'll try to keep this short and relevant. The applicants are partially approaching this application with a federal religious protection. From what I read in those provisions is that it is extremely broad and vague, so vague that pretty much everything fits. They make it seem that there's no room for discretion but there is ALWAYS room for discretion when things are too vague. If laws were black and white there would be no reason for appellate court proceedings. Look at the right to bear arms amendment. "The right to bear arms shall not be infringed". But look where we are; unless you are a felon, unless the arms are self propelled grenades, missiles, machine guns, you have a restraining order, etc. if it's vague then there's things to consider.

Ok now going to this application, when things go through the planning commission the procedure is did the applicant do everything in their power to meet all laws and codes and ordinances before asking for the relief or variance? Or did they do whatever suited their needs with total disregard to our laws and codes? Reading the application it seems the latter. They are supported by a large operation so claiming they didn't know doesn't go very far with me. They have many locations and own many properties. I'm my opinion this location was chosen not because it was an ideal location but rather it was cheaper than properly zoned land. The improvements were not done accidentally they were done intentionally and deceitfully and only uncovered because a contractor demanded their work be permitted. So did they do all they could to meet local and state laws before asking for relief? No, they did the exact opposite so I don't feel the county owes them any sympathy. It's exclusive Farm use and this is not a conditional use and this facility should be in a proper location not here simply because they got a good deal. This was not well thought out and they didn't know is not a valid excuse.

Thanks for taking the time to read all that Kindest regards Dirk Schlagenhauser

Sent from my iPhone

Exhibit 36 Z0208-21-CP
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**Ahrens, Melissa**

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**From:** Andrea Bowman <trustinggodnmw@gmail.com>  
**Sent:** Friday, January 7, 2022 1:49 PM  
**To:** Ahrens, Melissa  
**Subject:** Z0208-21-CP Northwest Bible Training Center exception proposal

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I am writing to say that I am IN FAVOR of this proposal.

I have read so many skewed write-ups about this that have caused people to "fear for their lives". I have been to their location twice and have only seen good things from them. My husband goes weekly to teach a class.

It seems this much needed facility is only asking for an exception while maintaining the grounds also as "farm use". These are not bad people. They are people wanting to help or getting help to improve who they are. These are caring people, unlike some who have spread the lies & brought fear to the community.

I personally have worked at a "rehab" facility for 7 years. These people want their lives back to normal. They are not forced to go, but have made the choice to get all the help then can. They will give back to their community given the chance.

There will NOT be added traffic except for an occasional celebration and inviting family & friends to join them, as with any other household in the neighborhood. They don't stay up all night drinking & shooting guns. They promote good.

We need more people like Northwest Bible Training Center who care, rather than marijuana growers or party animals who don't care about their neighbors. I have a young neighbor who seems to enjoy keeping us up all night with his loud vehicles, etc.

Sincerely,  
Andrea Bowman  
941-356-7116

Exhibit 37  
Z0208-21-CP

## Ahrens, Melissa

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**From:** Dan Moehnke <dredfir@gmail.com>  
**Sent:** Monday, January 10, 2022 3:09 PM  
**To:** Ahrens, Melissa  
**Subject:** File# 20208-21-CP Application. Mission Teens., Northwest Bible Training Center

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Melissa Ahrens,

Please do not let this application pass. This is a area of small family farms, and we wish it to remain so.

The nearest medical facility is over 10mi away. The nearest police (CCSD) response is 15 to 20 minutes away. I do not think they have adequate facilities to handle that many people safely.

Study shows about 50% of drug users relaps. Our area does not need that kind of added crime.

I went to grade school at the then Schubel grade school. My father went to the original grade school that was at the Moehnke Cemetary.

I beg you do not let their application pass.

Respectively, Dan Moehnke, Schuebel School Rd.

Sent from my Verizon, Samsung Galaxy smartphone

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Exhibit 38 Z0208-21-CP
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## **Addendum to Goal 14 Testimony Northwest Bible Training Center**

Regarding Goal 14, NWBTC submitted an application that did not include an Exception. County Staff later determined that Goal 14 applies. During the hearing Staff presented support for their determination the NWBTC was an urban use that most resembles "congregate housing". The applicant believes the need for a Goal 14 Exception is unwarranted because the use is rural.

A substantial argument can be made that NWBTC operating a small recovery farm is a rural use. The existing farmland, regardless of its features, will not be affected by the use; nor will the zoning be changed. *None of the uses or activities that will occur on the property after an approval are prohibited in the zone.*

The County asserts that "congregate" housing is an urban use and therefore violates Goal 14. The County is, respectfully, incorrect: First of all, it is unclear what the County means by "congregate"; using the plain meaning of the term, it means "formed by collecting; collective." See <https://www.dictionary.com/browse/congregate>. Applying this meaning, Oregon law already allows congregate housing -- i.e., housing for multiple persons living under one roof or on one tract of land -- in areas zoned for exclusive farm use:

- ORS 215.283(2)(aa) permits private elementary and secondary uses for "[r]esidential homes as defined in ORS 197.660, in existing dwellings," which include facilities for in-patient drug and alcohol treatment [see ORS 197.660(2) and 443.400(11)-12)].

The four examples of congregate housing cited above do not change the character of a given area from rural to urban. Because NWBTC's use of the property at 23172 South Bluhm Road is consistent with what is allowed in areas designated for exclusive farm use, we request the Commission find NWBTC's proposed use of the property is not an urban use.

ORS 197.732(2)(c)(B) and ORS 660-004-0020(2)(b) require justification for why the proposed use cannot be accommodated without a Goal Exception, or why the use cannot be accommodated in urban areas. County argues that the program operated for many years in Portland, but fails to acknowledge that NWBTC made a careful move away from the increased presence of bars, nude dancing, illegal drugs and alcohol, and homeless people on their doorstep.

A religious organization – be it a church or an addiction recovery farm like NWBTC – “**cannot function without a physical space adequate to their needs and consistent with their theological requirements.**” *ICFG*, 634 F.3d at 1047 (emphasis added) [quoting *Vietnamese Buddhism Study Temple in America v. City of Garden Grove*, 460 F. Supp. 2d 1165, 1171 (C.D. Cal. 2006) (*Vietnamese Buddhism*)].

The property also provides a space where NWBTC can use farming to instill biblical principles of discipline and responsibility – the proverbial “Christian work ethic,” if you will. See Ephesians 4:28 [“Anyone who has been stealing must steal no longer, **but must work, doing something useful with their own hands, that they may have something to share with those in need**” (emphasis added)]. Because “[t]he right to build, buy, or rent such a space is an indispensable adjunct of the right to assemble for religious purposes,” the Planning Commission should recommend approval of the application. *ICFG*, 634 F.3d 1047 (emphasis added) [quoting *Vietnamese Buddhism*, 460 F. Supp. 2d at 1171].

Clackamas County has reaffirmed Emergencies in response to the growing need. Concurrently, Governor Brown’s Executive Order 18-01 declaring substance abuse as a Public Health Crisis is still in effect. Oregon ranks 4<sup>th</sup> nationally in number of substance abusers per capita, and 4<sup>th</sup> in the number of homeless. *Oregon ranks 1<sup>st</sup> in the number of unsheltered homeless.* The most recent count in the County found 1,166 people on the streets.

Approval requires adequate evidence to show the use cannot be reasonably accommodated inside the UGB, or by intensifying development in existing rural communities. The need for the applicant to operate indefinitely as a nonprofit recovery farm, located on a minimum of 5 acres, cannot be ensured by relocating inside the UGB, if a suitable location. Intense development and population growth is rapidly eliminating large tax

lots, primarily for residential uses. Housing under construction on Beaver Creek Rd near the UGB includes a multifamily project for 700 new residents, and development is occurring on both sides of Beaver Creek Road at the 20700 block, and a new residential development is occurring near Beaver Creek and Leland Rds. Nearby Cities, Oregon City and Molalla, do not allow zoning for the use, nor would an adequate buffer be possible inside a nearby city.

County staff have repeatedly argued the use could be accommodated inside the UGB. The proposed use requires a quiet, discreet and permanent location that is beyond access to the temptations of urban environment, outside of the UGB. A large farming tract, or forest zoning would not be suitable. A location under 5 acres in size would also be unsuitable, and the likelihood of locating one inside or close to the UGB would be nearly impossible.

The County has determined the use as urban, and that it could be replicated inside the UGB without a major hardship to the applicant. The applicant does not agree with the determination, and now submits further evidence to substantiate the use rural, and Goal 14 does not apply. Regardless of that determination, *the applicant is providing additional evidence to ensure the requirements for a Goal 14 Exception have been met.*

NWBTC's proposed use requires two buildings to effectively operate. Firstly, there needs to be a separation of staff and those in the residential curriculum. Any code of ethics for a counselor will state it is inappropriate for a peer counselor to share living space with clients. Secondly, separation between men and women is crucial for addiction recovery and religious reasons.

As explained by Mr. Poole during his December 8th testimony, the property was purchased, and the curriculum was modified at great expense. The changes were undertaken in response to a myriad of concerns, including easy access to alcohol and drugs; and growing homelessness. The conditions eliminated the ability of the NWBTC to function in, or in close proximity to an urban environment.

NWBTC located an ideal property in an area of need that would be economically feasible for generations to come. They purchased the small farm on S. Bluhm Road at a time when the growing drug abuse and homeless problem required the County to declare Emergencies for both. Furthermore, the County has invested extensive resources to provide transitional housing for homeless veterans by approving an ordinance permitting up to 3 Veterans Villages\* in an industrial zone. The ZDO does not allow approval for residential uses in an Industrial zone. An exception was approved for a non-conforming use by the Commission in November of 2017, based on the desperate need, and minimal impacts of housing up to 30 residents on surrounding properties. The approval was complex, and required much accommodation. Unlike approval for the NWBTC application for 31 residents, (including staff) the County did not require an Exception to a State Planning rule.

The applicant has provided sufficient evidence, including compelling oral testimony from the participants to support the value of farming in their recovery. Several testified about their connection to the unique property, and the need to be living away from temptation. They raise chickens, tend livestock, and grow vegetables. The Greenhouse is tended year round. For many participants, it's their first experience at nurturing anything.

Farm animals, including pets, provide well known benefits to those in recovery. Caring for animals, and interacting with them provides positive reinforcement. For many years Clackamas County provided financial grants supporting an equestrian healing farm for veterans outside of Oregon City.

The Staff Report cites a use in Texas to support the proposed use is best described as "congregate housing", a use common in both urban and rural zones. Further research shows the use most similar to the applicant's is an 8 month residential program provided by Blanchet Farm in rural Yamhill County Oregon. The County, and other jurisdictions in Oregon designate recovery farms as a rural use. Blanchet and NWBTC are private non-profit

farms that offer voluntary long term recovery. Neither is a medical facility or outpatient treatment center. Blanchet was originally located in Portland, but

Revised its curriculum to a rural recovery farm program.

From the Blanchet Farm website:

“The farm’s unique work-based program helps people regain self-worth and job skills by caring for animals, tending the gardens, and maintaining the facilities. Blanchet Farm has been very successful in saving lives and providing a second chance for many people who have tried traditional recovery. *PLEASE NOTE: We are not a detox, medical, or treatment facility. We cannot administer medical care.*”

**Would the proposed use create EESE consequences more adverse than those that would occur on non-prime agricultural or rural residential land? Consequences if located on a similar property in the same zone or other farm zone??**

The applicant made repeated efforts to locate suitable properties for comparison, or as replacements. Co-director Susan Campell testified she had enlisted the assistance of a realtor. Although he use is not allowed by statute, the requirements for a 5-10 acre property could be met in the following rural zones: EFU and RRFF-5.

The applicant seeks relief from sections of the ZDO and ORS.660 administrative rules. As stated earlier in the application, the applicant will only conduct activities or uses that are allowed in the zone, and none of the existing farmland will be impacted or eliminated. *The proposed use does not conflict with the goal of protecting high value soils or farmland in any manner.*

The proposal meets and does not conflict with the requirements set forth in ORS.660.0040, establishing an urban use on undeveloped rural lands.

**Excerpts from EFU Section 401:**

“Section 401 applies to land in the Exclusive Farm Use (EFU) District.

401.05 APPROVAL CRITERIA FOR SPECIFIC USES. General Criteria 1.

Uses may be approved only where such uses: a. Will not force a significant change in accepted farm or forest practices on surrounding lands devoted to farm or forest use; and b. Will not significantly increase the cost of accepted farm surrounding lands devoted to farm or forest use.

CLACKAMAS COUNTY ZONING AND DEVELOPMENT ORDINANCE

401-13 Last Amended 10/23/21 2. The Natural Resources Conservation Service (NRCS) Web Soil Survey for Clackamas County shall be used to determine the soil classification and soil rating for a specific lot of record for a dwelling. Existing facilities wholly within a farm use zone may be maintained, enhanced, or expanded on the same tract, subject to other requirements of law, but enclosed existing structures within a farm use zone within three miles of an urban growth boundary may not be expanded beyond the requirements of Subsection 401.05(A)(5).

The need for a 5-10 acre lot limits the number of comparable properties in the zoning district. No locations were found that offered 2 suitable buildings. The applicant would be required to locate a property with an existing residence; enlarge it, and construct a second building and utilities.

A suitable comparable property is the 5.33 acre property located adjacent to the subject property. (Tax lots 500 and 501) The residence and farm buildings are typical for those in the zone. The property lacks a second building that is required for use. Construction of a second building would be approximately \$600,000, including utilities, permits, and fees. An approval for the use on the property or other comparable properties in the district would not create impacts greater or lesser than those proposed for the subject property.

Section 300 of the ZDO implements the policies for RRFF-5 (Rural Residential Farm Forest; 5 acre minimum:

## RURAL RESIDENTIAL FARM FOREST, 5 ACRES (RRFF-5) (6126/03)

PURPOSE: To provide areas for rural living where this type of development is compatible with the continuation of farm and forest uses. B. To conserve the natural scenic beauty of the County. C. To protect the watersheds of existing or potential major sources of municipal or domestic water supply from encroachment by uses that would affect the quantity or quality of water produced, protect wildlife habitats, and other such uses associated with the forest. D. To avoid the potential hazards of damage from fire, pollution, and conflict caused by urbanization.”

Staff argued on November 8 that NWBTC has not demonstrated that it will be substantially burdened by the denial of its rezoning application. A case from the U.S. Court of Appeals For the Ninth Circuit (the “Ninth Circuit”), *Intl. Church of the Foursquare Gospel v. City of San Leandro*, 634 F.3d 1037 (9th Cir. 2011) (*ICFG*), is on point here: *ICFG* involved a church that, like NWBTC, needed a new location more suitable to its needs. The Ninth Circuit ultimately held that the city’s decision to exclude the church from locating in the industrial zone violated the Religious Land Use and Institutionalized Persons Act (“RLUIPA”). Quoting a decision from one of its sister appellate courts, the Ninth Circuit held that forcing a religious organization that had already found a suitable location from which to operate to relocate can – and often does – substantially burden the organization’s free exercise of religion:

Similar to the EFU zoned properties, the proposed use does not violate any of the tenants of the zone or adversely affect the soils. A comparable property is an 8.65 acre tax lot and residence at 32E2500124, located at 22377 S Big Cedar Ln. 97004. The tax rate is the same. As with other properties studied, the construction of a second building would be required. Locating the NWBTC on RRFF-5 zoned property would not significantly impact the outcome or need to preserve prime soils.

A key consideration for decision makers is to determine whether the use could be allowed elsewhere without a Goal exception, and whether a denial would cause significant hardship to the applicant. NWBTC provides desperately needed security for those struggling with addiction. Aside from a high financial cost, relocating would take an extended search and a major

disruption would occur if the residents were relocated, or the use was denied outright. (Further information included in EESE analysis.)

The applicant has submitted adequate evidence to receive an Exception to Goal 14. *The criteria has been met.*



## **EESE Analysis NW Bible Training Center**

A Goal 2 Exception requires an EESE (Environmental, Economic, Social and Energy) analysis of the consequences if the use was proposed elsewhere in the zone; and if the adverse consequences would be worse if located on non-prime agricultural or rural residential zoned property.

This section provides a comprehensive analysis that an approval would provide negligible environmental or energy consequences while generating positive Social and Economic consequences for Clackamas County, and specifically the Beavercreek/ Molalla area. The data reveal there would be a substantial Social and Economic loss if the use is denied.

### **Environmental Consequences of Approval or Denial:**

The environmental consequences of the proposed use are far below the threshold for minimal impacts. There are no offensive odors, noise, or visual impacts to adjacent properties, as would be the case if the use was proposed elsewhere in the zone, or any other farm zone.

The residence and accessory buildings are insulated beyond current standards, and the applicant is committed to installing solar panels on the buildings to reduce energy dependence on PGE. The water usage and on-site wastewater disposal will not affect neighboring properties.

Most of the residents were homeless or houseless before voluntarily entering the long term residency program. The environmental impacts of homeless camps are a huge problem throughout the County. ODOT's budget has increased dramatically for cleanups on State administered highways and freeways. The County and local jurisdictions face increased costs as well. The January 6, 2020 Consent Agenda approval included an amendment to a contract with Rapid Response Bio Cleaning, LLC for Campsite Clean Up and Impact Reduction Services. **Amendment #1 adds \$189,000 for a new total not to exceed the value of \$315,000.**

The diversion of resources and monies is occurring when investment in congestion relief is critical. Congestion dramatically increases greenhouse gas emissions. The County Transportation policy on congestion relief provides further evidence of the environmental impacts of congestion.

Although the proposed use generates minimal traffic, concerns were expressed by 2 neighbors during the Planning Commission hearing. The applicant keeps a written log of all daily trips to and from the property. Total trips for a week in November 2021 was 24. Even if operating at the proposed capacity, the number of trips generated is far below the allowable threshold. Further evidence was derived from a basic traffic study completed by Lancaster Mobley in January 2022.\* The study tracked the number of vehicles and the time of day. Their conclusion was as follows:

Conclusions: Section 295.2.b of the Clackamas County Roadway Standards establishes a 20-trip threshold for a TIS unless there are specific safety issues identified by County staff. The proposed expansion of the Northwest Bible Training Center Addiction Recovery Farm is expected to generate an additional one (1) morning peak hour trip, one (1) evening peak hour trip, and fifteen (15) average weekday site trips, which is below the County trip threshold. It should be noted that this estimate should be considered a highly conservative estimate, given that the proposed expansion is not expected to increase the number of staff or deliveries to the addiction recovery farm. Therefore, the requirements for preparing a full TIS are not met and this trip generation analysis is sufficient to capture and evaluate the transportation impacts of the proposed project.

To view the entire traffic study see attached PDF.

## **Economic Consequences of Approval or Denial**

The value of turning compulsive dependents into productive residents is hard to measure in dollars. It's challenging to place an economic value of a life turned around. Their families and communities are no longer economically impacted... Government too... (See cost comparisons\*)  
NWBTC is an emerging partner with the County and local nonprofits.

The applicant has provided ample data, and a vast pool of statistics on the financial impacts to the County and other jurisdictions. The economic consequences of permitting the use are clearly expressed in the video record of the Nov. 8, 2021 Planning Commission hearing, and the Dec. 8, 2021 County Commission hearing. Angela Stempert, a recent graduate testified that she is no longer trapped in a cycle that included thousands of dollars invested in short term treatment. She is now a college graduate working on her Master's degree. It is difficult to quantify the economic benefits for her and other graduates, and for those paying the cost.

Cost for one month drug treatment at Oregon Trail Recovery or other county supported facility is approximately \$8,900 per month. The cost per month for a resident at NWBTC is approximately \$1150.00.

A December 2020 update on the Veterans Village Pilot Project showed a County investment of \$1, 818,560.26 in leasing, planning and operating the new facility for 15 residents. The report included \$302,000 to increase the capacity to 30 individuals in 2021; 1 fewer than in the application. Approval would provide a secure, safe and successful recovery program complimentary to those provided by government and commercial entities. The County Commission regularly approves large investments in addiction treatment and homelessness. The cost to taxpayers is enormous, and does not reflect the financial costs for private treatment paid for by other means. Below are 3 recent examples:

**Excerpts from Dec 16, 2021 BCC Consent Agenda:**

Approval of the 2022 Revenue Agreement with the Oregon Health Authority for the operation and financing of Community Mental Health, Addiction Treatment, Recovery & Prevention Services, and Problem Gambling

Programs. **Agreement value is \$8,383,001.70** funded through the State. Approval of an Intergovernmental Agreement with Clackamas Fire District #1 for the Project Hope program. **Contract maximum is \$31,090** funded through University of Baltimore Combating Opioid Overdose through Community-Level Initiative.

**Excerpts from January 6, 2022 Consent Agenda:**

“Approval of Amendment #1 to Contract #2905 with Rapid Response Bio Cleaning, LLC for Campsite Clean Up and Impact Reduction Services.

**Amendment #1 adds \$189,000 for a new total not to exceed the value of \$315,000** and extends the duration of the contract through December 14, 2024. This is an on-call contract with services paid by Departments utilizing these services some of which may use County General Funds. Approval of a Subrecipient Grant Agreement with Todos Juntos for PreventNet Community School drug and alcohol prevention services in Rural Clackamas County. Grant **Agreement value is \$190,000**. Approval of an Intergovernmental Agreement with Tualatin Valley Fire and Rescue for the Project Hope program. **Contract not to exceed \$35,490**. Approval of an Intergovernmental Agreement with Clackamas County Fire District #1 for the Project Hope program. **Contract not to exceed \$31,090**. Funding through University of Baltimore Combating Opioid Overdose through Community-Level Initiative. Approval of a Non-Federal Subrecipient Grant Amendment #4 with Northwest Housing Alternatives for System Diversion, Homelessness Prevention, and Rapid Re-Housing Services. **Amendment adds \$60,000 for a revised maximum contract value of \$600,000**, funded by the State.

**Excerpts from January 13, 2022:**

Approval of Amendment #06 to Intergovernmental Agreement #166036 with the Oregon Health Authority for the Operation and Financing of Community Mental Health, Addiction Treatment, Recovery & Prevention Services, and Problem Gambling Programs. **Amendment adds \$98,582.78 to the Agreement, increasing the maximum value to**

**\$9,238,209.62.** Funding through the State of Oregon, Oregon Health Authority. No County General Funds are involved. – Behavioral Health 10. Approval of an Intergovernmental Agreement with the University of Baltimore to accept a Grant Subaward for Combating Overdose through Community-Level Intervention Initiative to expand the capacity of Project Hope. **Total Grant Award is \$233,457.** Approval of Subrecipient Grant Agreement Amendment #5 with Ant Farm, Inc., to Provide rent assistance to households impacted by the COVID-19 crises. **Amendment #5 adds \$2,532,377** of Federal Emergency Rental Assistance funds and reduces Community Develop Block Grant COVID funds by \$409,946. **New contract total is \$11,442,019** funded through Federal, State, and HUD grants. Note: The January 6th Consent agenda Includes, *“Approval of a \$190,000 Subrecipient Grant Agreement with Todos Juntos for PreventNet Community School drug and alcohol prevention services in Rural Clackamas County.* Grants are awarded on an as needed basis. This one is specifically for ‘Rural Clackamas County.’”

The ongoing social crisis is outpacing the financial ability of governments, private entities and families to address it. Estacada Mayor Sean Drinkwine was unable to participate in the hearing, but expressed strong support for the need. The Mayor has been a proponent of establishing similar facilities during his entire tenure. Molalla Mayor Scott Kaiser presented a similar support, adding *“The drug abuse problem is growing in the area.”*

The use as a nonprofit recovery farm removes property taxes from the County. Based on a \$790,378.00 assessed value, the taxes for 2021 that were not collected is \$11,501. That amount is expected to increase by 3% annually. The use does not add capacity to the schools, roads and other taxpayer provided services. To date there has not been a single call to the County Sheriff, and the need for services provided by property taxes are minimal. The long term effect of uncollected property taxes would be dramatically offset by the economic benefits of the use.

EESE analysis typically focuses on the economic impacts of a proposal, such as a winery or use that attracts visitors. Those considerations are negligible in the proposal, however, a denial would create tremendous financial consequences to the NWBTC. Locating a suitable property with 2 comparable buildings in a local farm zone is unlikely. The applicant has searched for comparable properties to no avail. It's size, large residence and the accessory building and suitability were primary requirements for the applicant when relocating.

The building has been described in the public record as a barn, a converted barn, a shop and as a "dangerous building". It is a modern commercial wood structure engineered by an architect. The main floor is sq ft, and the second floor is 1,200 ft; totalling sq ft. The previous owner received approval for a major upgrade in 2013. Some of the work did not receive final inspection, allowing permits to expire. Unpermitted interior remodeling was also done. Although permits expired and unapproved remodeling was done, the structure is of highest quality, and is not "inherently dangerous". The applicant was unaware of the building's circumstances when purchasing the property in 2018; but is aware a land use approval does not authorize the proposed use prior to the building receiving an official approval for occupancy.

Based on a September 2020 Underwriter's report, the replacement value of the building is approx \$517,00. Actual cost to construct the building, or a similar building would be approximately \$580,000 in 2022 dollars, and would divert considerable time and resources from the resident's needs..

### **Social Consequences of an approval or denial:**

A challenging aspect of the EESE analysis is to determine the social consequences of a life turned around. In this application the social and economic consequences are Intertwined.

Addiction is a common factor in the growing homeless situation. A 2019 Countywide survey, done prior to the pandemic determined that 1,166 residents were homeless, a 7% increase over 2017.

Susan Campbell testified about her own experience which eventually led her to become a Co-director with Mr. Previti. She testified an approval would open the door to serving adult women in a safe separate dormitory. Women are especially susceptible to abuse and prostitution when they are addicted to drugs. An approval opens the door as it has done for many who've testified, including Rose Brown-Antunez, a previous graduate who left a life of drugs and prostitution to become a successful member of society. She regained custody of her 3 children, and is no longer a burden to them, other family members; She is no longer a burden to the taxpayers.

In spite of the current conditions, all 2020 graduates are clean and sober. The benefits to themselves and society are self-evident.

### **Energy Consequences:**

Analysis and comparisons of the energy usage verify there would be no significant energy consequences if the proposal was located on property in the same zone or other rural farm zone in the County.

There is no need for urban services, nor would there be if the application was in a different zone. The existing electric service to the property is provided by PGE, a private utility. The proposed electric use is below what is allowed for the property. The use would not measurably change if the

application was elsewhere in the zone, or on other farm zoned property. An adequate well, and on-site wastewater disposal do not require the need for urban services.

The number of trips generated is far below the allowable threshold. Long term residency in which all participants and staff live on the property. There is a modest energy savings in dormitory housing when compared to all other multifamily uses. Food and general merchandise are purchased or donated in bulk. The location and use does not require electrical or other energy uses that would differ if the use was proposed elsewhere in the zoning district, or in an RRRF-5 zone.

The residence and accessory buildings are modern construction, and meet or exceed current energy efficiency standards. The property is ideal for the addition of solar panels on the building roofs. The applicant is committed to installing a system, and will accept it as a requirement for approval.

There is a modest energy savings in dormitory housing when compared to conventional multifamily or residential uses.

Would the energy usage, primarily electricity, be significantly affected if the use were elsewhere in the EFU zone, or on a similar farm property located in a different zone? The answer is clearly no. Attached is a copy of the electrical usage for the most recent calendar year.

[NWBTC Energy Usage.docm](#)

[431 KB](#)

**APPENDIX / REFERENCES**



Blanchet Farm Yamhill County:

[Blanchet Farm Program](#)

Clackamas Veterans Village:

<https://www.clackamas.us/transitionalhousing>

Clackamas Veterans Village; approved by the Board Nov 30, 2017: “Submitted by Clackamas County’s Health, Housing and Human Services Department, the application was for a conditional use permit to host a temporary transitional shelter community for veterans in unincorporated Clackamas County. With this action, county staff will continue to work with partners and volunteers to prepare to provide decent, safe and sanitary shelter, along with a variety of services, for up to 30 local veterans. The efforts also allow the county to continue to strive to reach its goal of eliminating homelessness among Clackamas County veterans”

Clackamas County Commission:

<https://www.clackamas.us/bcc>

Clackamas County Corrections Division:

<https://web3.clackamas.us/pay/corrections/>

Clackamas County Dept of Health, Housing & Human Services:

<https://www.clackamas.us/h3s>

Clackamas County Social Services:

<http://www.clackamas.us/socialservices/>

Clackamas GIS Cmap:

<https://www.clackamas.us/cmap>

Lancaster Consulting (traffic study:)

Oregon.gov Homeless Prevention:

<https://www.oregon.gov/ohcs/homelessness>

/

Rural Residential Rule (2001)

Estacada Mayor Sean Drinkwine:

[seandrinkwine@cityofestacada.org](mailto:seandrinkwine@cityofestacada.org).

Molalla Mayor Sean Kaiser:

[skeyser@cityofmolalla.com](mailto:skeyser@cityofmolalla.com).

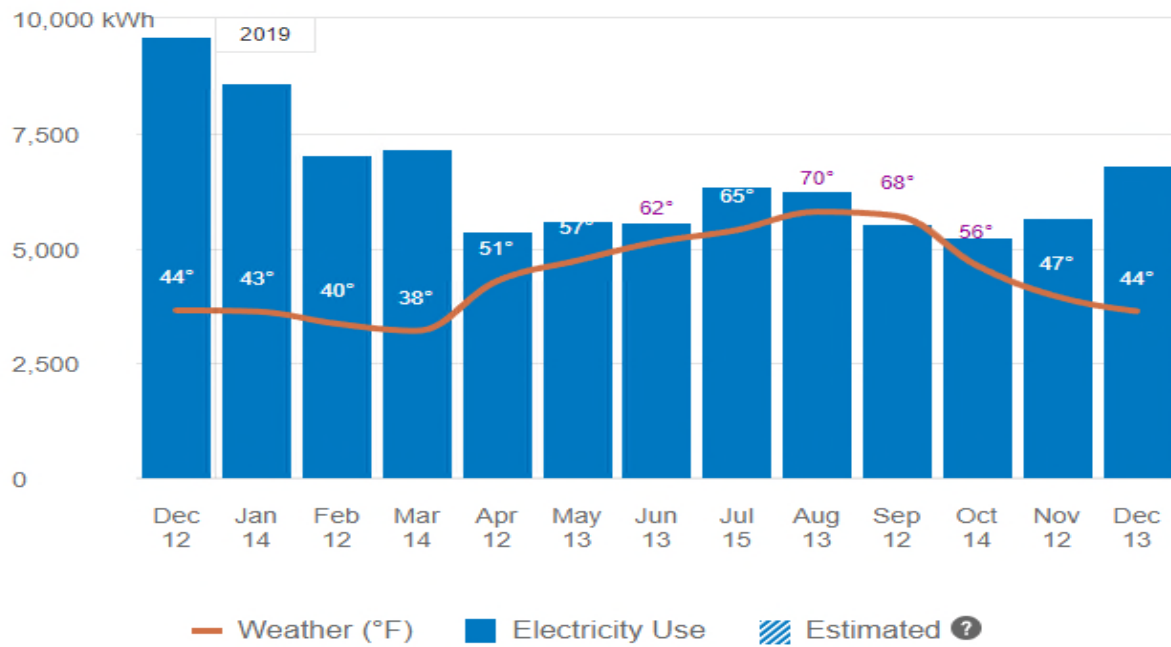
# Track your energy use

## My use

BY COST | BY USAGE | BY SIMILAR HOMES

View By Month ▾

< Dec 2018 - Dec 2019 >



**Green Button**  
Download my data

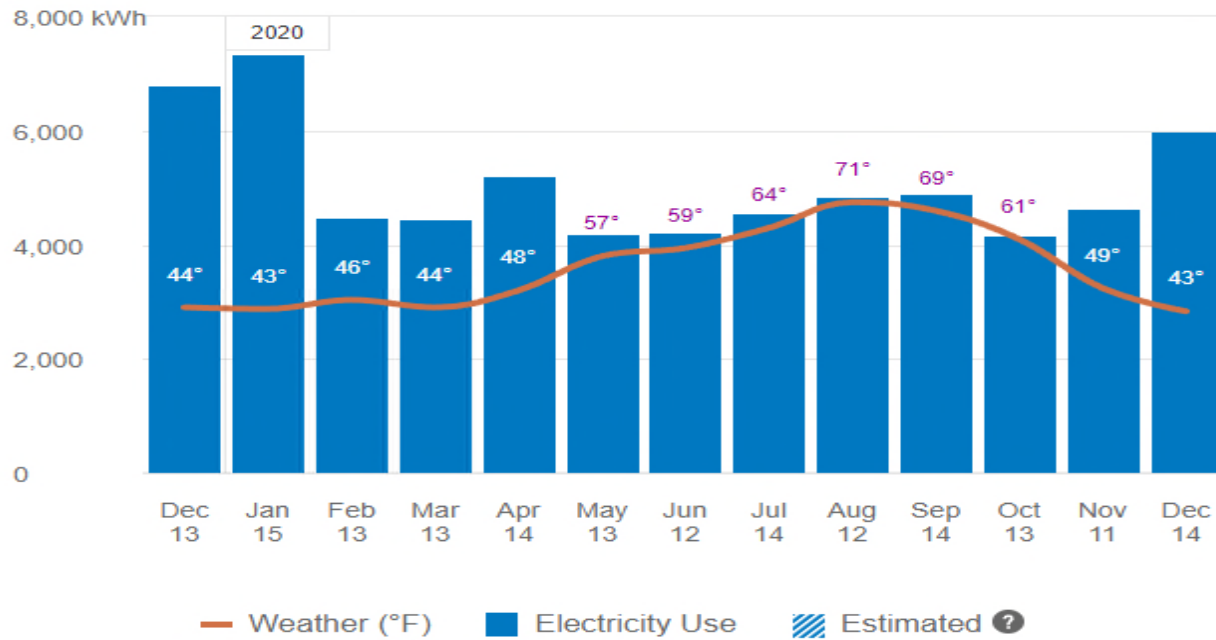
# Track your energy use

## My use

BY COST | BY USAGE | BY SIMILAR HOMES

View By Month ▼

< Dec 2019 - Dec 2020 >



**Green Button**  
Download my data

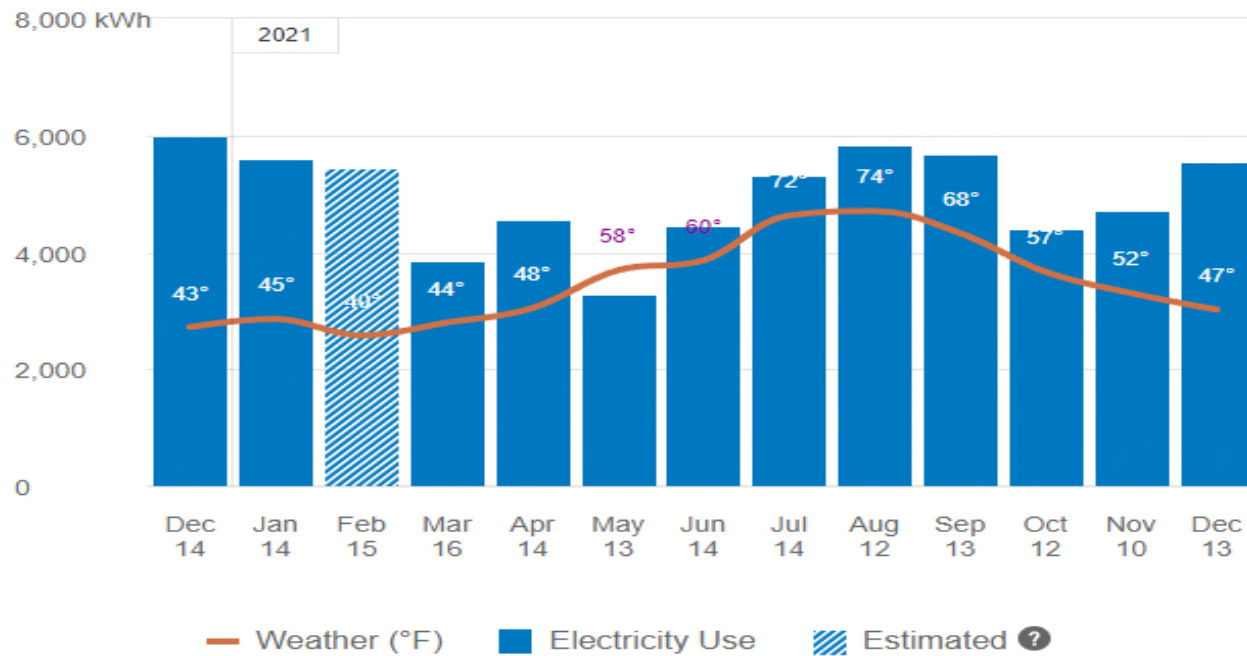
# Track your energy use


## My use

BY COST | BY USAGE | BY SIMILAR HOMES

View By Month ▼

◀ Dec 2020 - Dec 2021 ▶



 **Green Button**  
Download my data

All information for energy use (except the number of Residents/Staff) was provided by Portland General Electric along with a guarantee that NWBTC's energy usage at any time cannot negatively affect neighboring properties.

Name Mission-Teens Inc (NWBTC)  
 Address 23172 S BLUHM RD, BEAVERCREEK OR 97004-8700  
 Account Number 7085118698-4562200000  
 Service 2116724660

TYPE	START DATE	END DATE	USAGE	UNITS	COST	NOTES
Electric billing	8/14/2018	9/12/2018	6186	kWh	\$757.11	27- Residents/Staff
Electric billing	9/13/2018	10/11/2018	6364	kWh	\$779.05	27- Residents/Staff
Electric billing	10/12/2018	11/9/2018	5951	kWh	\$728.12	26- Residents/Staff
Electric billing	11/10/2018	12/12/2018	9616	kWh	\$1,180.44	29- Residents/Staff
Electric billing	12/13/2018	1/14/2019	8612	kWh	\$1,048.12	28- Residents/Staff
Electric billing	1/15/2019	2/12/2019	7044	kWh	\$847.91	29- Residents/Staff
Electric billing	2/13/2019	3/14/2019	7179	kWh	\$864.20	25- Residents/Staff
Electric billing	3/15/2019	4/12/2019	5361	kWh	\$645.24	21- Residents/Staff
Electric billing	4/13/2019	5/13/2019	5599	kWh	\$673.93	24- Residents/Staff
Electric billing	5/14/2019	6/13/2019	5584	kWh	\$672.20	21- Residents/Staff
Electric billing	6/14/2019	7/15/2019	6347	kWh	\$764.38	22- Residents/Staff
Electric billing	7/16/2019	8/13/2019	6270	kWh	\$755.12	23- Residents/Staff
Electric billing	8/14/2019	9/12/2019	5523	kWh	\$665.10	23- Residents/Staff
Electric billing	9/13/2019	10/14/2019	5242	kWh	\$631.20	20- Residents/Staff
Electric billing	10/15/2019	11/12/2019	5673	kWh	\$683.18	23- Residents/Staff
Electric billing	11/13/2019	12/13/2019	6798	kWh	\$818.75	24- Residents/Staff
Electric billing	12/14/2019	1/15/2020	7344	kWh	\$879.32	23- Residents/Staff
Electric billing	1/16/2020	2/13/2020	4484	kWh	\$534.57	12- Residents/Staff
Electric billing	2/14/2020	3/13/2020	4454	kWh	\$531.00	12- Residents/Staff
Electric billing	3/14/2020	4/14/2020	5222	kWh	\$621.91	13- Residents/Staff
Electric billing	4/15/2020	5/13/2020	4206	kWh	\$501.65	14- Residents/Staff
Electric billing	5/14/2020	6/12/2020	4210	kWh	\$502.12	13- Residents/Staff
Electric billing	6/13/2020	7/14/2020	4549	kWh	\$542.24	13- Residents/Staff
Electric billing	7/15/2020	8/12/2020	4855	kWh	\$578.47	12- Residents/Staff
Electric billing	8/13/2020	9/14/2020	4898	kWh	\$583.54	13- Residents/Staff
Electric billing	9/15/2020	10/13/2020	4160	kWh	\$496.19	14- Residents/Staff
Electric billing	10/14/2020	11/11/2020	4641	kWh	\$553.15	13- Residents/Staff
Electric billing	11/12/2020	12/14/2020	6003	kWh	\$715.07	14- Residents/Staff
Electric billing	12/15/2020	1/14/2021	5592	kWh	\$686.75	14- Residents/Staff
Electric billing	1/15/2021	2/15/2021	5440	kWh	\$687.85	13- Residents/Staff
Electric billing	2/16/2021	3/16/2021	3852	kWh	\$488.17	13- Residents/Staff
Electric billing	3/17/2021	4/14/2021	4551	kWh	\$576.06	12- Residents/Staff
Electric billing	4/15/2021	5/13/2021	3284	kWh	\$417.11	9- Residents/Staff
Electric billing	5/14/2021	6/14/2021	4465	kWh	\$566.47	10- Residents/Staff
Electric billing	6/15/2021	7/14/2021	5312	kWh	\$673.21	14- Residents/Staff
Electric billing	7/15/2021	8/12/2021	5842	kWh	\$739.99	14- Residents/Staff
Electric billing	8/13/2021	9/13/2021	5683	kWh	\$719.95	11- Residents/Staff
Electric billing	9/14/2021	10/12/2021	4410	kWh	\$559.52	13- Residents/Staff
Electric billing	10/13/2021	11/10/2021	4707	kWh	\$596.95	14- Residents/Staff
Electric billing	11/11/2021	12/13/2021	5558	kWh	\$704.19	14- Residents/Staff













Northwest Hill  
Pricing Center  
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## Memorandum

To: Susan Price Campbell, Daniel McGuigan, & Christopher Prevet  
Northwest Bible Training Center

From: Myla Cross  
Nick Mesler, PE

Date: January 19, 2022

Subject: Northwest Bible Training Center Addiction Recovery Farm  
Trip Generation Analysis



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## Summary of Findings

Section 295.2.b of the Clackamas County Roadway Standards establishes a 20-trip threshold for a transportation impact study (TIS) unless there are specific safety issues identified by County staff. The Northwest Bible Training Center Addiction Recovery Farm, located on Tax Lot 33E 31 503, currently houses 14 residents while the proposed use will house 31 residents. The existing buildings include two single-family residences and two accessory buildings. No new construction is planned to accommodate the increase in residents. Using a highly conservative analysis, the estimated peak hour site trip generation as a result of the expansion will generate a net total of one (1) morning and one (1) evening trip, which is well below the County trip threshold. Therefore, the requirements for preparing a full TIS are not met.

## Introduction

This memorandum reports the findings of a trip generation study conducted for the proposed expansion of the Northwest Bible Training Center Addiction Recovery Farm (Tax Lot 33E 31 503), located at 23172 S Bluhm Road in unincorporated Clackamas County, Oregon. The approximately 7.69-acre property currently has two single-family residences, and two accessory buildings. No new construction is planned to accommodate the expanded number of residences on site.

## Location Description

The project site is located on the east side of S Bluhm Road in unincorporated Clackamas County. The site is currently developed as two single-family residences and two accessory buildings, and is similarly surrounded by single-family rural residential neighborhood in the north, east and west directions and undeveloped land to the south.

The adjacent street of S Bluhm Road operates under the jurisdiction of Clackamas County. Access to the Northwest Bible Training Center Addiction Recovery Farm is provided via a driveway along S Bluhm Road. S Bluhm Road is classified as a local roadway with an undivided two-lane cross-section, a prima-facie speed limit

of 25 mph, and a substandard gravel/paved mix pavement with no curb, gutter, sidewalks, or bicycle facilities, consistent with the rural character of the neighborhood.

Figure 1 presents an aerial image of the nearby vicinity with the project site outlined in yellow. A site plan is attached to this memorandum.

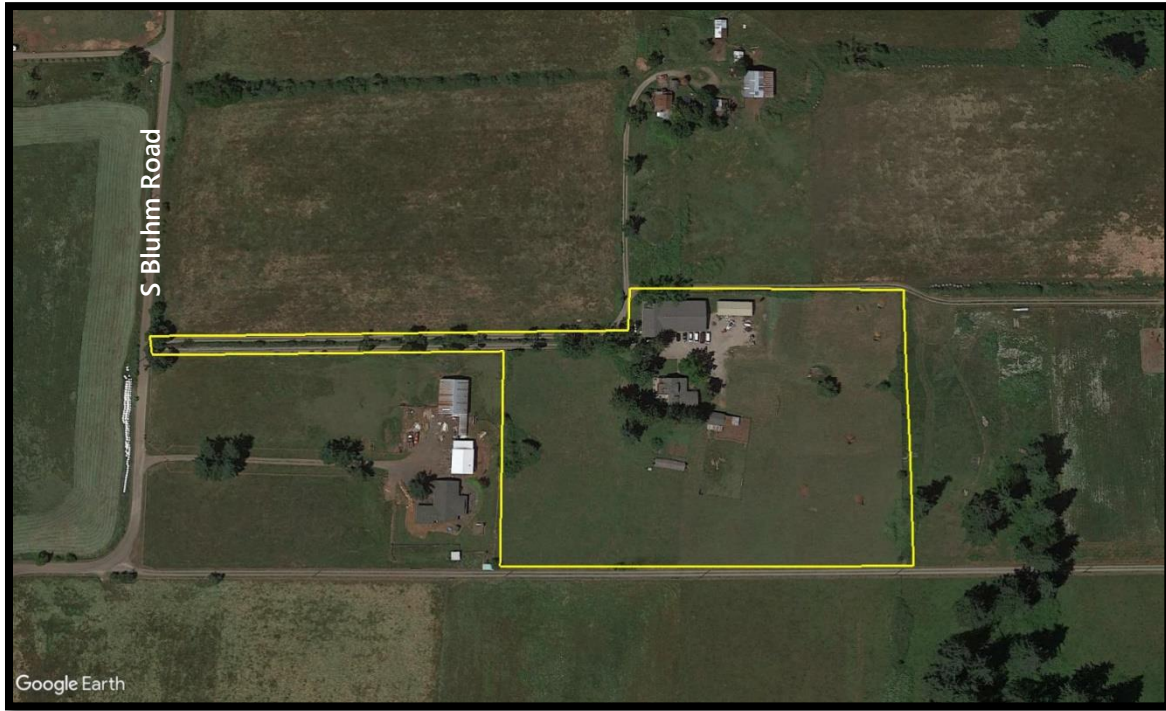


Figure 1: Aerial Photo of Site Vicinity (Image from Google Earth)

## Trip Generation

On January 11, 2021, traffic counts were conducted at the driveway along S Bluhm Road. Zero (0) morning peak hour trip, one (1) evening peak hour trip, and twelve (12) total trips were recorded. The proposed expansion will increase the number of residents at the addiction recovery farm from 14 to 31 residents. Trips inbound and outbound from the addiction recovery farm are accounted for by staff and deliveries. The proposed expansion is not anticipated to cause an increase in the number of daily staff or deliveries to the development. Residents stay on the farm for a minimum of 8 months and typically do not drive to or from the site during the 8 months stay. However, a factor of 2.21, which is indicative of the proportional increase in residents, was applied to the existing trip generation rates to provide a worst-case scenario estimate of the number of trips generated by the proposed expansion. This should be considered a highly conservative estimate.

The proposed development is estimated to generate an additional one (1) morning peak hour trip, one (1) evening peak hour trip, and fifteen (15) average weekday trips, as summarized in Table 1. As the time of day that staff arrive to the addiction recovery farm can vary slightly, one (1) morning peak hour trip was added to the estimated trip generation.



**Table 1: Trip Generation Summary**

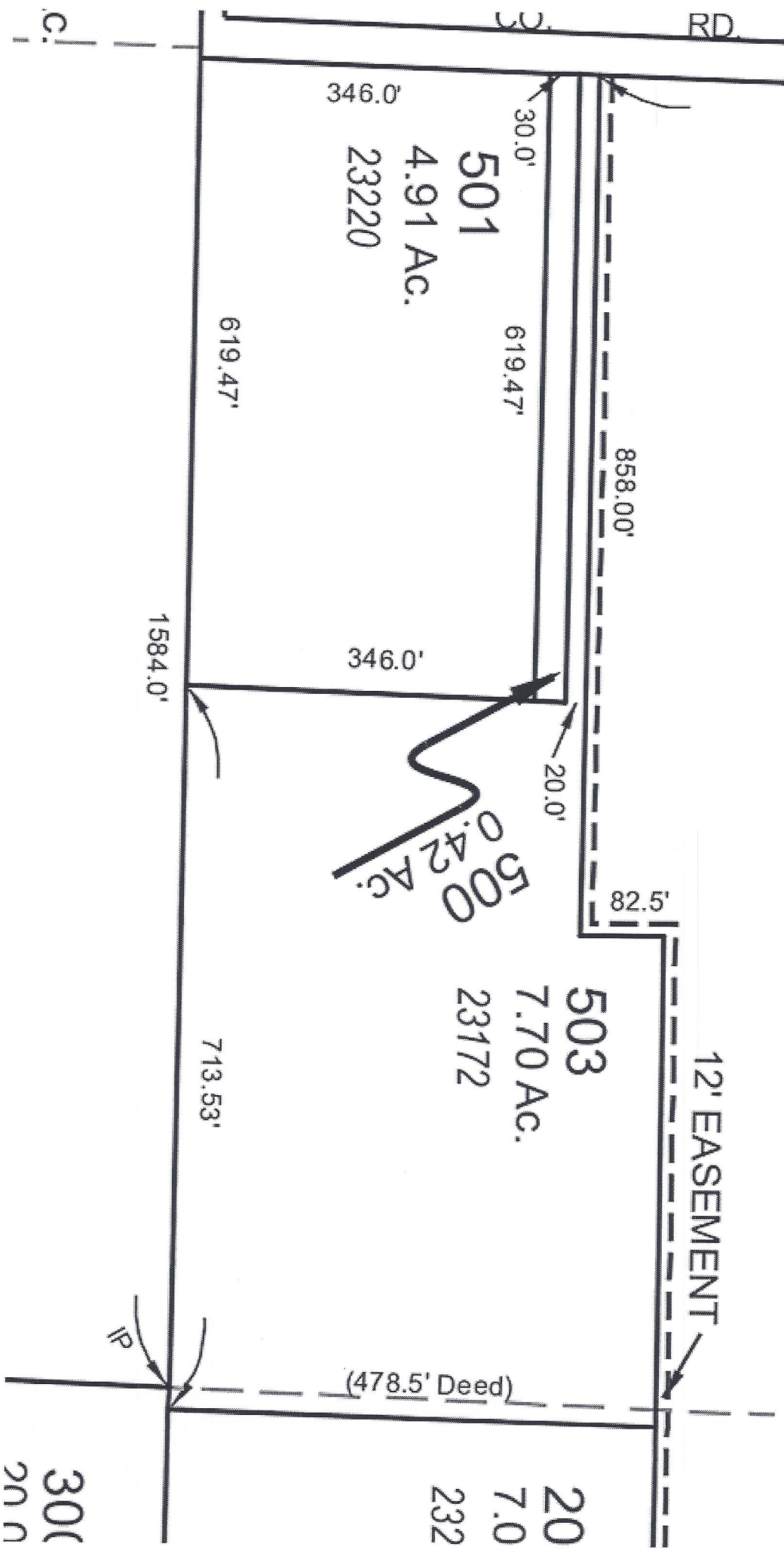
Land Use	Resident Occupancy	Morning Peak Hour			Evening Peak Hour			ADT
		In	Out	Total	In	Out	Total	
Existing	14	0	0	0	0	1	1	12
Proposed	31	1	0	1	0	2	2	27
Net Total		1	0	1	0	1	1	15

Since the proposed development is expected to generate fewer than 20 peak hour trips, the threshold for requiring a TIS is not met. Accordingly, the preparation of this trip generation analysis is sufficient to capture and evaluate the transportation impacts of the proposed project.

## Conclusions

Section 295.2.b of the Clackamas County Roadway Standards establishes a 20-trip threshold for a TIS unless there are specific safety issues identified by County staff. The proposed expansion of the Northwest Bible Training Center Addiction Recovery Farm is expected to generate an additional one (1) morning peak hour trip, one (1) evening peak hour trip, and fifteen (15) average weekday site trips, which is below the County trip threshold. It should be noted that this estimate should be considered a highly conservative estimate, given that the proposed expansion is not expected to increase the number of staff or deliveries to the addiction recovery farm. Therefore, the requirements for preparing a full TIS are not met and this trip generation analysis is sufficient to capture and evaluate the transportation impacts of the proposed project.







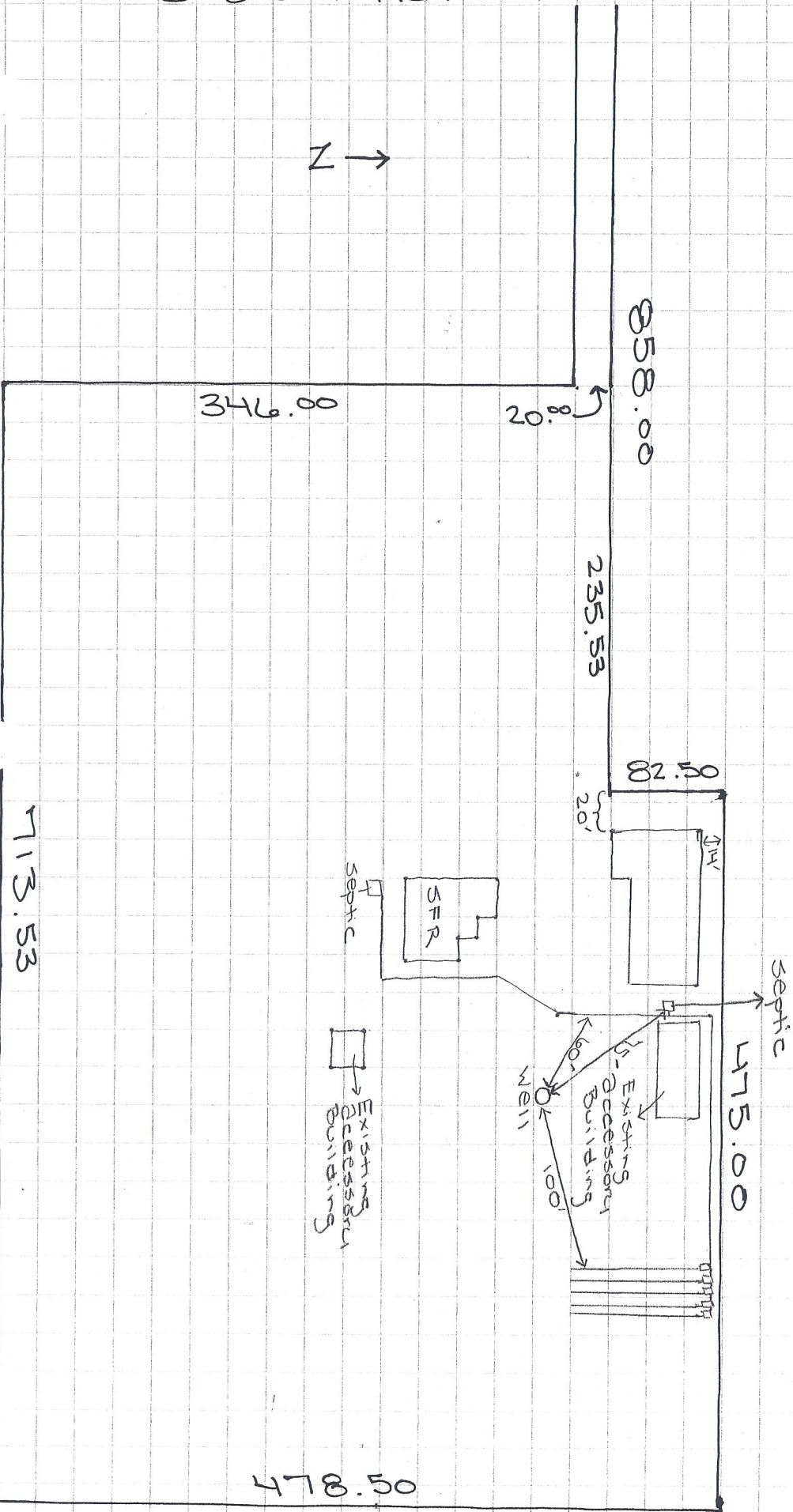
S. Bluhm Rd.



# Plot Plan

23172 S. Bluhm Rd  
Beaver Creek, OR 97004

Township: 35  
Range: 3E  
Section: 31  
Tax Lot: 503





**All Traffic Data Services**  
www.alltrafficdata.net

Site Code:  
23172 S. Bluhm Rd Driveway

Start Time	1/11/2022 Tue	EB	WB							Total
12:00 AM		0	0							0
01:00		0	0							0
02:00		0	0							0
03:00		0	0							0
04:00		0	0							0
05:00		0	0							0
06:00		0	0							0
07:00		0	0							0
08:00		0	0							0
09:00		1	0							1
10:00		1	2							3
11:00		0	1							1
12:00 PM		0	0							0
01:00		0	1							1
02:00		2	0							2
03:00		0	0							0
04:00		0	0							0
05:00		0	1							1
06:00		1	1							2
07:00		0	0							0
08:00		0	0							0
09:00		1	0							1
10:00		0	0							0
11:00		0	0							0
Total		6	6							12
Percent		50.0%	50.0%							
AM Peak	-	09:00	10:00	-	-	-	-	-	-	10:00
Vol.	-	1	2	-	-	-	-	-	-	3
PM Peak	-	14:00	13:00	-	-	-	-	-	-	14:00
Vol.	-	2	1	-	-	-	-	-	-	2
Grand Total		6	6							12
Percent		50.0%	50.0%							
ADT		ADT 12		AADT 12						

## Ahrens, Melissa

---

**From:** Amy Manning <manning.amym@gmail.com>  
**Sent:** Monday, January 24, 2022 11:16 AM  
**To:** Ahrens, Melissa  
**Subject:** Input re: addiction center in Beavercreek

**Warning: External email. Be cautious opening attachments and links.**

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Dear Clackamas County Commissioners:

Just wanted to take a moment to voice my feelings on the proposed addiction treatment facility that is being proposed in my community of Beavercreek, OR.

It is clear that our nation is really struggling with addiction issues and we need to do something to address the problem. I myself have had extensive experience in dealing with someone I deeply cared for that experienced heroin addiction. For five years, I tried everything I could do to get him clean. I won't go into detail other than to say it was an absolutely horrifying experience.

What I learned is that it is very difficult to treat addictions. To say that addiction is a complex issue would be an understatement. The person I was involved with never did get clean - there just isn't enough available resources. Addiction treatment requires **professionals** who are deeply knowledgeable about the biological and psychological issues that are involved in addiction. A church center that solely focuses on faith-based issues can certainly be an adjunct therapy such as 12 step programs, but on its own is entirely insufficient.

It seems that we desperately need to find help for people experiencing addictions. However, I feel that by allowing these addiction centers to operate, we're giving the false sense of security that there is help out there for people who need it, when what we really need is more funding, more science, more professional help.

I've had another personal experience that is relevant that I'll share with you. Back in the 90's, I had an aunt experiencing a severe mental health crisis. At the time she was deeply religious and sought help through a similar live-in, church-based program located in nearby Mulino. While she was there, she was told (and came to believe) that she was a victim of satanic ritual abuse when she was a child. Her behavior became extremely worrisome. The church "diagnosed" her as having Multiple Personality Disorder. Her behavior was very concerning. The most extreme example is when she drew blood from herself and wrote a letter to one of her personalities discussing suicide.

This church told her that she needed to break off ties to all of her family except her children and husband since we were all Satan worshippers (obviously untrue). I'm not sure what all took place, but I know it took a long time for my aunt to break away from this cult and get professional help. She is now properly medicated and has had professional treatment. But the experience scarred her and her children deeply.

It is my feeling that people seeking mental health and/or addiction treatment need to be in facilities that are licensed and regulated with professionals to ensure that the problems are not compounded by incompetence.

Z0208-21-CP  
EXHIBIT 40

Lastly, I worry about precedence. I don't see how it is fair to allow one landowner to break the rules and not allow everyone else to do something similar on their property should they choose to. And with how widely publicized this case has been, it will absolutely encourage other landowners in Clackamas County to do something outside their zoning restrictions since they know that they will be forgiven at a later time, just as the bible center has if the commissioners allow it to continue.

Thank you for your time.

Amy Manning

Beavercreek, OR

**Ahrens, Melissa**

---

**From:** SARGIRL PDX <barleygirl1@gmail.com>  
**Sent:** Monday, January 24, 2022 9:40 AM  
**To:** Ahrens, Melissa  
**Subject:** Beaver creek Neighbor

**Warning: External email. Be cautious opening attachments and links.**

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Hi there...

I am a neighbor of the amazing community that is Beaver creek, Oregon.

I first want to express my appreciation for being able to write in and express some concern, over the new addiction center that has been proposed to Beaver creek.

I have been a long time supporter of anyone needing treatment and support for issues surrounding addiction and mental health. I have worked in the field of emergency medicine and closely with clients who struggle with mental health and addiction, for nearly 20 years. I have worked in a facility such as the one they are proposing and I cannot imagine how it will work, in a small rural town.

While they are an organization to be applauded, my thoughts are there just aren't enough medical/social/judicial services out here, to help clients successfully navigate their health and recovery. Busses don't frequently travel out here. The social services are a LONG way from the location they are proposing. There is one store and a Saloon.

In my experience, transportation for clients in recovery is absolutely ESSENTIAL. On-site meetings are great, but reintegration into the outside community, HAS to be an option as well. There aren't even sidewalks to take folks to town to catch the bus or a ride-share.

I am one of many who are concerned FOR the clients of this proposed facility. I truly believe people need/deserve the chance to get back on their feet. My hope for their clients is a place with SOME accessibility to ALL of the services they need to establish a healthy lifestyle and be successful in their recovery. In my opinion, Beaver creek, Oregon just doesn't have the infrastructure to support it at this time and I hope you will vote to deny their permit.

Thanks for your time.  
Melissa Fischer  
Beaver creek Resident

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Sent from Gmail on my iPhone.

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EXHIBIT 41