



PLANNING & COMMUNITY DEVELOPMENT DEPARTMENT

STAFF REPORT

DATE: September 6, 2023

TO: Hearing Officer

SUBJECT: Review of Modification to Conditional Use Permit #3278

LOCATION: 301 North Orange Grove Boulevard

APPLICANT: Sequoyah School / Neighborhood Church

ZONING DESIGNATION: PS (Public / Semi Public)

GENERAL PLAN DESIGNATION: Institutional

CASE PLANNER: Michael Rocque

STAFF RECOMMENDATION: Adopt the Environmental Determination and review and acknowledge that the Neighborhood Church and Sequoyah School are operating in compliance with the approved conditions of approval and to **approve** the increase in student enrollment to as high as 216 students (Phase 4).

PROJECT PROPOSAL: Review of Modification to Conditional Use Permit #3278: To allow an increase in the maximum student enrollment to 216 students (Phase 4), as allowed by Condition of Approval #3 of Modification to Conditional Use Permit #3278 (approved on July 30, 2019). Condition of Approval #4 requires a review of the school's compliance with the conditions of approval by the Hearing Officer at a public hearing prior to this student enrollment increase.

ENVIRONMENTAL DETERMINATION: This project has been determined to be exempt from environmental review pursuant to the guidelines of the California Environmental Quality Act (Public Resources Code §21080(b)(9); Administrative Code, Title 14, Chapter 3, §15314, Class 14, Minor Additions to Schools; and there are no features that distinguish this project from others in the exempt class and, therefore, there are no unusual circumstances. Section 15314 exempts minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25% or ten classrooms,

whichever is less. The increase in student enrollment, including this phase, was studied, and conditionally approved on July 17, 2019.

BACKGROUND:

Site characteristics: The subject site is an irregular shaped lot measuring 118,680 square feet in size, located on the northwest corner of North Orange Grove Boulevard and Arroyo Terrace. The site is accessed via a driveway from Arroyo Terrace and a driveway from Orange Grove Boulevard through Westmoreland Place, a private street that serves the subject property. The 2.48-acre site consists of six contiguous lots. The site is currently developed as a Religious Facility consisting of four structures, a Church, Private School operation, and 74 surface parking spaces located along Westmoreland Place.

Adjacent Uses: North: Public Space (The Gamble House)
South: Single-Family Residential
East: Multi-Family Residential
West: Single-Family Residential

Adjacent Zoning: North: PS (Public and Semi-Public)
South: RS-4-HD (Single-Family Residential 0-6 Dwelling Units per Acre, Hillside Development)
East: RM-16 (Residential Multi-Family 0-16 Dwelling Units per Acre)
West: RS-4-HD (Single-Family Residential 0-6 Dwelling Units per Acre, Hillside Development)

Previous cases on this property: CUP #3278 – A Conditional Use Permit to expand a religious assembly use adding a chapel and classroom buildings.
Approved on November 19, 1997

Modification to CUP #3278 –

- 1) Modification of Conditional Use Permit: to allow the alteration in the operation of an existing Religious Facility (Neighborhood Church) land use;
- 2) Conditional Use Permit: to allow the establishment of a Private School (Sequoyah High School) of up to 190 students;
- 3) Conditional Use Permit: to allow the expansion of a Child Day Care Center (Fair Oaks Preschool) land use from 43 children to 69 children; and
- 4) Minor Conditional Use Permit: to allow shared parking between the proposed Religious Facilities, Private School and Child Day Care land uses.

Approved on August 18, 2016

Modification to CUP #3278 –

- 1) Modification to Conditional Use Permit: to allow religious services on weekdays and Saturdays; to modify the start time of weekday religious events from 6:30 p.m. to 5:00 p.m.; increase the maximum number of people attending religious weekday activities from 74 to 100; and modify the hours of these activities from 6:30

p.m. to 9:00 p.m. to 5:00 p.m. to 9:45 p.m. on Monday through Thursday and from 5:00 p.m. to 11:00 p.m. on Fridays.

- 2) Modification to Conditional Use Permit: to increase the Private School enrollment from 130 students to 216 students while eliminating the existing Child Day Care Center. The Child Day Care Center was proposed to vacate the property in July 2020, after which the Private School enrolment is proposed to reach 216 students.

Approved on July 17, 2019

Minor Modification to CUP #3278 –

Clarification of Conditions of Approval #3, #4, and #40, related to when student enrollment can increase and that a public hearing could be required in order to resolve community complaints.

Approved on July 30, 2019

Review of Minor Modification to CUP #3278 –

Review of Conditions of Approval #3 and #4 in order to increase student enrollment to as high as 195 students, per phase 3 and review of the church's and school's compliance with the conditions of approval by the Hearing Officer at a public hearing prior to the enrollment increase.

Approved on March 1, 2022

ENTITLEMENT BACKGROUND:

On July 17, 2019, the Hearing Officer approved a Modification to Conditional Use Permit #3278 to allow: 1) religious services on weekdays and Saturdays, as well as modifications to the hours of religious services and maximum allowed attendance; and 2) an increase in student enrollment to as high as 216 students over three phases.

On July 30, 2019, the Director of the Planning & Community Development Department approved a Minor Modification to three conditions of approval. Condition of approval #3 (below) was modified to change the previously approved three phases of student enrollment increase into four phases, while keeping the maximum enrollment of 216 students in the final phase.

3. *This approval also authorizes the Private School to increase student enrollment up to a maximum of 216 students. The enrollment of the Private School shall occur in four phases, occurring at the beginning of the academic year, with only one enrolment increase per academic year, and as follows:*

Phase 1: Academic Year 2019-2020: Enrolment increase up to 135 students

Phase 2: Academic Year 2020-2021: Enrolment increase up to 170 students

Phase 3: Enrollment increase up to 195 students

Phase 4: Enrollment increase up to 216 students

Condition of approval #4 (below) was modified to require a public hearing, and review of the church's and school's compliance with the conditions of approval, prior to the phase three increase to 195 students.

4. *In the month of January before increasing enrolment beyond 170 students, and before increasing enrolment beyond 195 students, the applicant or successor in interest shall file an application with the Planning Division for a Hearing Officer Review of this Conditional*

Use Permit. The review shall be considered at a duly-noticed public hearing, with written notice to all property-owners within five hundred feet (500') of the perimeter of the subject property, as well as any parties who request to be so notified. Said applications shall provide evidence of the applicant's compliance with all conditions of approval herein.

Condition of approval #40 (below) was modified to clarify the process and coordination of the two annual community meetings.

40. The applicant shall conduct two community meetings annually, the purpose of which is to solicit input concerning the impacts of activities conducted on-site upon surrounding residents. The location, date, and time of each community meeting shall be coordinated by the Religious Facility, Private School, Community and City Staff. If no date/time can be agreed to, City Staff shall set the date/time and location as needed. The operator of the Religious Facility shall notify all neighboring property owners on Arroyo Terrace, Bellmore Way, Scott Place, the Gamble House, Westmoreland Academy, Orange Grove Village residents, the Zoning Administrator and all interested parties 14 days in advance of the annual community meeting. The meeting shall be attended by representatives of the Religious Facility, the Private School, and City Staff. As a result of the community meetings, and consistent with Pasadena Municipal Code requirements, a public hearing may be required to address the concerns raised, at the discretion of the Zoning Administrator pursuant to Municipal Code Section 17.78.090 – Permit Modification.

On November 3, 2021, Neighborhood Church submitted a Request for Public Hearing with the City to initiate a review of the conditions of approval in order to increase enrollment to as high as 195 students, per Phase 3 of condition of approval #3 and #4. On February 16, 2022, the Hearing Officer reviewed and acknowledged that the Neighborhood Church and Sequoyah School are operating in compliance with the approved conditions of approval and approved the increase in student enrollment.

On May 17, 2023, Neighborhood Church submitted a Request for Public Hearing with the City to initiate a review of the conditions of approval in order to increase enrollment to as high as 216 students, per Phase 4 of conditions of approval #3 and #4. This is the review under consideration in this report. Additionally, a variety of supporting documents were submitted intended to show compliance with the conditions of approval.

ANALYSIS:

As noted above, conditions of approval #3 and #4 laid out the process by when student enrollment at the school can increase. Below is a discussion of the church's and school's compliance with a number of conditions of approval. Please note that many of the conditions relate to plans/construction that have already occurred so compliance in such cases has already taken place. As such, the discussion below focuses primarily on compliance with on-going operational conditions of approval that apply to the church and/or school. All of the conditions of approval are included in Attachment A - the July 30, 2019, Decision Letter for the Minor Modification of Modification of the Conditional Use Permit.

5. The Phase 2 student increase shall occur only after the existing Child Day Care Center has completely vacated the site.

The Child Day Care Center has vacated the site after which the Phase 2 student enrollment occurred.

6. *The right granted under this application must be enacted within 36 months from the effective date of approval. It shall expire and become void, unless an extension of time is approved in compliance with Section 17.64.040.C of the Zoning Code.*

The school increased its student enrollment to the Phase 1 limit of 135 for the 2019-2020 academic year, within three years of the approval and has consecutively increased their enrollment for each academic year. As such, the approval has been exercised.

12. *Weekly church services utilizing the main sanctuary building shall be limited to Sundays, Saturdays, and after school hours on weekdays. Church services shall only occur on the weekdays when no other Religious Facility event/activity is occurring on-site, after school hours.*

Based on information submitted by the applicants and a review of the church calendar website, church services are primarily occurring on Saturdays and Sundays or after school hours.

13. *Activities in the chapel and activities in the main sanctuary shall not occur simultaneously unless they are religious-related activities of the church or the attendance combined at both locations does not exceed 150 persons. During church services in the sanctuary the chapel will not be used for additional or alternate worship, in person or via broadcast.*

Based on information submitted by the applicants and a review of the church Event Reservation Guidelines website, church services occur with these limitations, including limiting the number of attendees to no more than 150 persons.

14. *The maximum number of people attending all events on campus occurring at any one time shall not exceed 390 adults.*

Based on information submitted by the applicants, the church monitors the number of adults on the site when scheduling events, including limiting large events to not exceed 390 adults. There has been no evidence that any previous events have exceeded this number at any one time.

15. *A maximum of 18 events exceeding 150 total people on site or occurrences of multiple concurrent events or activities exceeding 150 total people on site shall be permitted on the property per calendar year, with the exception of regular religious worship and regular Private School operating hours. These events shall end by 9:45 p.m. Sunday through Thursday, 10:00 p.m. Fridays, and 11:00 p.m. on Saturdays. On a quarterly basis, the applicant or successor shall submit to the Zoning Administrator a list of events exceeding 150 people. The list shall include the type of event, the number of attendees, and if any music/amplified sound occurred.*

Based on information submitted by the applicants, four events have occurred in 2023 (March 11th, June 5th and 11th and August 30th) related to Sequoia High School. There are two additional events scheduled for 2023 (December 9th and 11th) at this time. Currently, there are four scheduled events for 2024 (March 9th, June 3rd and 7th and August 30th). The lists for both 2023 and 2024 are accessible on the church website under 'Information for Local Residents'.

16. *No more than one of the events or occurrences of multiple concurrent events or activities exceeding 150 attendees shall be scheduled on a single day.*

None of the large events that occurred in 2023, or scheduled for 2024, are on the same day. The church indicates they monitor the event schedule to ensure multiple large events are not scheduled on the same day and are also listed in the Event Reservation Guidelines.

17. *Whenever events or occurrences of multiple concurrent events or activities are scheduled for which the attendance is anticipated to be greater than 150 people, at least two parking attendants shall be provided to direct vehicles to approved parking areas. The parking attendants shall be easily identifiable (e.g. clothing, vest, etc.). Duties of the parking attendants shall include but not be limited to directing vehicles to parking spaces, ensuring efficient flow of vehicles within the parking lots, maximizing the utilization of the parking lots and directing vehicles to alternative off-street parking lots when alternatives are available. Parking for said events shall not occur in the surrounding neighborhoods.*

The church indicates they provide two visible parking attendants for large events to direct traffic to appropriate parking spaces and perform the duties outlined in the condition of approval. Additionally, the church Event Reservation Guidelines indicates that a notice to neighbors with event details is sent at least two weeks in advance of said event.

18. *The operator of the Religious Facility shall obtain a quarterly schedule of events occurring at the Gamble House and Westmoreland Academy for which attendance is anticipated to be greater than 150 people.*

19. *The operator of the Religious Facility shall not schedule an event or of multiple concurrent events or activities exceeding 150 people when the Gamble House or Westmoreland Academy schedule an event for which attendance is anticipated to be greater than 150 people.*

The church inquires both the Gamble House and Westmoreland Academy about large events at those locations and to inform both institutions of large events at the church/school site, in order to ensure there are no overlapping events on the same day. Further, the church blocks out availability for events on their calendar when the Gamble House or Westmoreland has planned large events.

20. *The operator of the Religious Facility shall publish a monthly schedule of scheduled events and shall make the schedule available to all neighboring property owners on Arroyo Terrace, Bellmore Way, Scott Place, the Gamble House, Westmoreland Academy and all interested parties at no cost.*

21. *The operator of the Religious Facility shall notify all neighboring property owners on Arroyo Terrace, Bellmore Way, Scott Place, the Gamble House, Westmoreland Academy, Orange Grove Village residents, the Zoning Administrator and all interested parties 14 days in advance of any events anticipated to exceed 150 people, with the exception of religious ceremonies related to death or sudden tragedy, in which case notice is required as soon as reasonably possible.*

The church website has a link (neighborhooduu.org/calendar/) to a calendar of events, as well as a dedicated page (neighborhooduu.org/neighborhood-information/) for local residents with information on scheduled large events and contact phone numbers and an email address for questions and/or concerns. Further, the church emails the neighboring property owners and the City's Zoning Administrator when there are large events that exceed 150 people.

22. *There shall be no events scheduled during Monday through Friday prior to 6:30 p.m. After the Child Day Care Center has vacated the site, no events shall be scheduled during Monday through Friday prior to 5:00 p.m. The Religious Facility use shall be limited to regular business office activities located only in the building identified on the approved plans as the "Neighborhood House", except on days when the Private School is not operating on-site and for one small religious worship, pastoral, or spiritual practice activity per day not to exceed 20 attendees.*
23. *Activities unrelated to the Private School, with the exception of administrative office activities for the Religious Facility, shall be limited to a maximum total of 100 people on the property and limited to the hours of 6:30 p.m. to 9:45 p.m. on Monday through Thursday when the Private School is operating on-site and from 6:30 p.m. to 10:00 p.m. on Fridays when the Private School is operating on-site. After the Child Day Care Center has vacated the site, these activities are limited to the hours of 5:00 p.m. to 9:45 p.m. on Monday through Thursday when the Private School is operating on-site and from 5:00 p.m. to 10:00 p.m. on Fridays when the Private School is operating on-site.*

The church had indicated that they schedule the permitted types of events at the permitted locations and within the allowed days/hours and follows attendance restrictions.

24. *The operator of the Religious Facility use shall provide a map identifying approved parking areas. To the extent feasible, the operator shall provide all visitors, members and non-member groups a copy of the map at no cost. A copy of the map shall be provided to the Zoning Administrator.*

The church has submitted a copy of a map that indicates that overflow parking options are permitted on N. Orange Grove Boulevard and E. Walnut Street. When available, overflow parking is also allowed at the Pasadena Museum of History, Scott Methodist Church, Gamble House, and Westmoreland Academy. Overflow parking is not permitted on either side of Arroyo Terrace.

25. *Distilled spirits shall not be served at any event on the site. Beer and wine may be served at events provided that the service of beer and wine shall terminate at 10:00 p.m.*

The church has confirmed that distilled spirits are not allowed on the site.

26. *Music in the outdoor gardens shall be terminated at 9:00 p.m. and shall be directed away from the southern and western property lines. Amplified music/sound shall not be permitted in the outdoor gardens.*

27. *Indoor amplified music shall be terminated at 11:00 p.m. on Saturdays, and any other day that the events are permitted to operate until 11:00 p.m.*

28. *For events where music is provided or where beer and wine is served, an event coordinator and a security officer shall supervise the event and ensure compliance with noise and alcohol restrictions. The event coordinator and the security officer shall be easily identifiable (e.g., clothing, vest, etc.).*

The church has confirmed that they comply with the music conditions, and that church events end at 10:00 p.m., so therefore no amplified music could occur as late as 11:00 p.m. Finally,

an event coordinator and security officer are provided by the church to monitor and enforce alcohol and noise regulations.

One formal complaint was received by the church in June 2023 for music playing loudly during an event. No other music complaints have been received since then.

29. *All loading and unloading related to the Private School and Religious Facility land uses, including loading and unloading related to the events shall occur on the designated parking lot for the uses and shall not occur on Arroyo Terrace, Scott Place, and Rosemont Avenue.*

The church provided a copy of its 'Room Rental Policies' which outlines the responsibilities of those who rent a room, including where parking is and is not allowed. The "Room Rental Policies" document states that parking is not allowed on Arroyo Terrace, Scott Place or Rosemont Avenue.

30. *Vehicle circulation and vehicle loading and unloading for the Private School and land use shall only occur as depicted in the approved site plan stamped "Approved at Hearing July 17, 2019", unless and only as modified by the final traffic management plan reviewed and approved by the Department of Transportation.*

31. *All staff and visitors of the Private School shall park in the intended parking on site or in the designated offsite location for special events. Staff and visitors of the Private School shall not park in the surrounding residential neighborhoods.*

32. *Informational packets shall be distributed to the parents of all students of the Private School and posted on the school website stating instructions for drop-off/pick-up procedures to direct parents to remain in the queue until the car in front of them pulls away. Students shall be directed to exit and enter vehicles quickly. Parents who arrive early for pick-up shall be directed to turn off their engines while waiting. A copy of the information packet shall be submitted to Zoning Administrator to verify compliance.*

The school has confirmed that they enforce compliance with this condition, and when violations are seen, or the school is made aware of them, they are addressed and rectified in a timely manner. In addition, the school provided copies of emails/screenshots of parking protocols, and online resources to inform parents and students of the parking and drop-off/pick-up procedure. These procedures are sent as part of the back-to-school mailing, student-parent handbook and in weekly newsletters. Also, the school places A-frame signage at parking and exit routes from the site to prevent impacts to parking on the neighboring residential streets, specifically, Arroyo Terrace and Scott Place. These resources are also provided on the Sequoyah School website with links to parking information.

33. *A carpooling program shall be implemented for the Private School, and a carpooling coordinator shall be designated by the school to coordinate and oversee the implementation and operation of the carpooling program, including providing assistance in matching families and students for carpooling purposes. An ongoing address-matching database shall be in place in the school office throughout the school year. A copy of the carpooling program shall be submitted to Zoning Administrator to verify compliance.*

34. *Prior to the start of each school year, the Private School shall distribute information packets to each student family fully describing the carpooling program. This information shall be*

included in all enrollment packages, parent/student orientation and back-to-school night events.

The school provides carpooling information on its 'Parent Portal', as supported by the materials submitted for review of the Conditional Use Permit. This information is available to parents year-round.

- 35. The maximum number of staff employed by the Private School on-site shall not exceed 26 without modification of the Conditional Use Permit.*

The school has submitted a list of employee titles and has confirmed that the maximum number of staff does not exceed 26 as of August 16, 2023.

- 36. The applicant and all user of the site shall adhere to the City's noise regulations as specified in Section 9.36 of the Pasadena Municipal Code.*

One formal complaint was received by the City's Code Enforcement Division in July 2019 for the possible use of a leaf-blowing machine before the allowed hours. Two other complaints were received by the church in April and August 2023 for a leaf-blowing machine being used in the early morning hours on a weekend. The church addressed the complaints and followed up directly to resolve the issue.

- 37. The hours of operation for the Private School shall be from 7:00 a.m. to 5:00 p.m., Monday through Friday.*

The school's lease agreement with the church allows the use of the site Monday through Friday from 7:00 a.m. to 5:00 p.m. The typical school schedule has classes from 8:15 a.m. to 3:15 p.m., with athletics, office hours, and after school programs following.

- 38. Private School students shall be prohibited from driving to school and shall not park on site, or in the surrounding residential neighborhood or any public street offsite within one half mile. This shall be a component of the contract between the Private School and students enrolled in the school.*

This mandate is included in the student-parent handbook, reiterated at orientation and is part of the enrollment contract. The school's enrollment contract states that students are not permitted to drive to school and, "...shall not park Westmoreland Avenue, parking lots adjacent to campus, in the surrounding residential neighborhood, or any public street offsite within one half mile of the Neighborhood Church or High School campus."

- 39. The Religious Facility operator shall require that any smoking on-site shall occur a minimum of 100 feet from any residential property line. Signs shall be posted throughout the site to the satisfaction of the Zoning Administrator.*

"No Smoking" signs have been placed on the campus.

- 40. The applicant shall conduct two community meetings annually, the purpose of which is to solicit input concerning the impacts of activities conducted on-site upon surrounding residents. The location, date, and time of each community meeting shall be coordinated by the Religious Facility, Private School, Community and City Staff. If no date/time can be agreed to, City Staff shall set the date/time and location as needed. The operator of the Religious Facility shall*

notify all neighboring property owners on Arroyo Terrace, Bellmore Way, Scott Place, the Gamble House, Westmoreland Academy, Orange Grove Village residents, the Zoning Administrator and all interested parties 14 days in advance of the annual community meeting. The meeting shall be attended by representatives of the Religious Facility, the Private School, and City Staff. As a result of the community meetings, and consistent with Pasadena Municipal Code requirements, a public hearing may be required to address the concerns raised, at the discretion of the Zoning Administrator pursuant to Municipal Code Section 17.78.090 – Permit Modification.

The church and school have held two annual meetings with the community since 2021. These meetings have been held via zoom and/or in person with the most recent meetings being held on January 12, 2023, and June 15, 2023. Nothing discussed in the meetings that have been held has risen the level of needing a public hearing to resolve.

- 41. On its website, the applicant shall provide a telephone number (or telephone numbers) which individuals can call to express concerns about events or activities on the subject property. During all events on the subject property, the applicant shall have a live person answering this telephone.*
- 42. The applicant shall maintain a schedule of events, which it shall post on its website. The website shall indicate whether amplified music and/or sound is permitted for each event. The schedule of events on the website shall be updated regularly, but no less than once per week.*

The church website has a link (neighborhooduu.org/calendar/) to a calendar of events, as well as a dedicated page (neighborhooduu.org/neighborhood-information/) for local residents with information on scheduled large events and contact phone numbers and an email address for questions and/or concerns.

- 43. The applicant shall maintain a written record of all complaints. This record shall identify the complainant, the date and time the complaint was received, the nature of the complaint, how the complaint was addressed or resolved, and the date and time the complainant was notified of how the complaint was addressed/resolved. A copy of this record shall be provided to the Planning and Community Development Department on a quarterly basis.*

The application materials include a log of neighbor complaints dating back to August 2016. The complaints are either summaries of complaints or verbatim from emails and text messages between the complainant and church/school staff. The log also includes how the complaint was addressed. Some examples include when cars are parked on Arroyo Terrace or other locations and inquires as to whether a particular event had an attendance of more than 150 people, which would have required neighborhood notification.

Although the church and school cannot completely control the actions of every parent, visitor and staff at all times, the church and school treat each complaint seriously and take the time to respond to each complainant with a resolution. The number of complaints has decreased since 2021- there have been 16 complaints from 2021-2023 (which is 24% of all complaints since 2016). Both the church and school have been vigilant in their efforts to lessen the impact on the immediate neighborhoods.

- 46. Within 90 days of the effective date of this approval, the applicant shall submit a traffic management plan analyzing the proposed student drop-off and pick-up activities for the school.*

- a) *The plan should identify a traffic/parking coordinator and provide a contact phone number in order for the public to communicate any particular school-related traffic issues and parking questions.*
- b) *The traffic management plan shall lay out the vehicle path to and from the site. Appropriate stacking length shall be accommodated on-site. Drop off and pick-up activities shall not interrupt traffic on City streets.*
- c) *The applicant shall coordinate the restriping of Orange Grove Blvd between Walnut Street and Prospect Blvd to allow for a northbound left turn lane providing access to the Westmoreland Place Driveway at Orange Grove Blvd. The applicant shall be responsible for the design and installation of the northbound left turn lane.*
- d) *The traffic management plan shall be reviewed and approved by the Department of Transportation.*

A traffic management plan was submitted to the City's Department of Transportation in Fall 2019 and was subsequently approved. Regarding item (c) and the restriping of N. Orange Grove Boulevard, the applicant submitted a conceptual design re-striping plan for N. Orange Grove Blvd, however there was some concerns to this idea from the residents of the multi-family housing development on the east side of N. Orange Grove Boulevard, at least partially due to a potential loss of on-street parking on the east side of N. Orange Grove Boulevard. At this time, the Department of Transportation opted to not implement the concept plan.

GENERAL PLAN CONSISTENCY:

As conditioned, the increase in student enrollment for the Private School is consistent with General Plan Land Use Element Policy 2.9 (Institutional Uses), which promotes accommodation of the development of educational, religious, cultural, and similar facilities that enrich the lives of Pasadena's residents. The increase in enrollment for the Private School would allow for the growth of a four-year high school curriculum on the site, which is consistent with the General Plan Land Use Policy 2.9.

Additionally, the increase in enrollment is consistent with Goal 16 (Superior Services), which encourages a superior level of services meeting the needs of Pasadena's diverse residents, including schools, hospitals, parks, child and senior facilities and programs, libraries, shelters, public auditoriums, health services, social clubs, and recreation centers. The increase in enrollment would accommodate the increasing needs of the Pasadena's residents.

The operation of a four-year high school on campus is consistent with Goal 17 (Educational System), which endorses a strong and diverse educational system that is responsive to the life-long needs of the community and related to maintaining high quality of life and a string economy.

The continuation of the Religious Facility operation is consistent with Policy 16.7 (Shared Facilities), which encourages the sharing of facilities between various public service providers, as well as those offered by private entities, such as the joint use of school play areas for recreation, school facilities for child and after school day care, and libraries for civic and cultural events. The hours for the Religious Facility events and activities coincide with the hours of the Private School, which maximizes the joint use of the shared campus.

ENVIRONMENTAL REVIEW:

This project was previously determined to be exempt from environmental review pursuant to the guidelines of the California Environmental Quality Act (Public Resources Code §21080(b)(9));

Administrative Code, Title 14, Chapter 3, §15314, Class 14: Minor Additions to Schools). Section 15314 exempts minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25% or ten classrooms, whichever is less. There are no features that distinguish this project from others in the exempt class and, therefore, there are no unusual circumstances.

The Phase 4 increase up to 216 students was previously analyzed and approved in 2019 and there have been no changes in circumstances to invalidate that analysis and approval.

REVIEW BY OTHER CITY DEPARTMENTS:

The entire project was previously reviewed by the Department of Transportation, Department of Public Works, Fire Department, Building and Safety Division, and Design and Historic Preservation Section. The Department of Transportation, Department of Public Works, and Building and Safety Division provided conditions of approval, which were incorporated in the July 30, 2019 Decision Letter for the Minor Changes to Modification of the Conditional Use Permit #3278 (Attachment A). These conditions of approval remain in full force and effect.

CONCLUSION:

It is staff's assessment that the findings necessary for approval of the review of the Modification to Conditional Use Permit #3278 to authorize an increase in the student enrollment to no more than 216 students (Phase 4) can be made. The information submitted by the church and school show a necessary level of compliance with the operational conditions of approval that apply to both uses. They have shown a willingness to engage with their surrounding neighbors to address any problems that have arisen since the school was approved to be on the site in 2016. The complaint log supports this by documenting each interaction and the steps taken to address each complaint or question. The church and school also have detailed the various ways in which compliance with each of the operational conditions of approval has been addressed, both through information given to users of the church and school, and by using the church and school website as a resource for the neighbors to find information and contact methods for the school.

Therefore, staff recommends the Hearing Officer review and acknowledge that Neighborhood Church and Sequoyah School are operating in compliance with the approved conditions of approval and to approve the increase in student enrollment to as high as 216 students (Phase 4). Prior to any future increase in student enrollment, a public hearing before the Hearing Officer must occur to review the church's and school's compliance with the adopted conditions of approval, as required by condition of approval #4.

Attachment A: Decision Letter (Minor Changes to Modification of Conditional Use Permit #3278: July 30, 2019)

ATTACHMENT A

**Decision Letter (Minor Changes to Modification of Conditional Use
Permit #3278: July 30, 2019)**