

EXHIBIT A

**PROJECT NARRATIVE AND CONDITIONAL USE FINDINGS
THE HELP GROUP STUDENT ENROLLMENT INCREASE**

**The Help Group School Culver City Campus: THG West and Summit View School,
4160 Grand View Blvd.; 12095–12101 (odd) West Washington Blvd.;
Portions of Lots 148, 149, 150, and 151 of the East Ocean Tract, City of Culver City**

Related/Prior Cases: CUP P1-999017; CUP/M P-2011175, Resolution No. 2012-R081

PROJECT DESCRIPTION

The Help Group, a non-profit organization dedicated to providing educational opportunities for children with special needs, proposes to modify its current conditional use permit (“**CUP**”; case no. CUP/M P-2011175) to increase enrollment by 50 students, from a current, permitted enrollment of 600 students to a proposed enrollment of 650 students, consistent with its request in 2011 and with the mitigated negative declaration (“**MND**”) adopted for the current CUP. The requested enrollment is also consistent with the existing improvements on the Project Site, which were designed to accommodate an enrollment of 650.

The Current CUP notes, in condition 59, that The Help Group agreed to refrain from further requests for increased enrollment. However, as described further below, that condition anticipated typical absorption and enrollment rates, and did not anticipate the closure of another special-needs school or the need for absorption of the students. Additionally, as the previous request was originally intended to reflect no request beyond an ultimate student body of 650 students, the requested enrollment increase would maintain consistency with the 2011 request and would, as a practical matter, reach the planned capacity of the Campus.

PROJECT SITE

The Project Site comprises 4160 Grand View Avenue; and 12095, 12099, and 12101 Washington Boulevard, located on the north side of Washington Boulevard and south of Culver City’s border with the City of Los Angeles, approximately between Grand View Boulevard on the west and Inglewood Boulevard on the east. The former Washington Hospital Medical Center occupied the Project Site, an outpatient mental health center and other medical offices currently occupy all but about 300 s.f. of the four-story office building at 12095 Washington Boulevard. The remaining 300 s.f. are used for school support offices, no student instruction occurs in that building. The buildings identified as 4160 Grand View, and 12099 and 12101 Washington Boulevard, were remodeled to serve the 650 student population originally requested in 2011. The current request includes no expansion of any buildings or construction of new buildings, and does not request an increase in the permitted number of staff.

The Project Site is surrounded by a mix of commercial retail, office, and multi- and single-family residential uses. To the west of the Project Site, across Grand View Boulevard and along Washington Boulevard, are a consignment store, restaurant, and auto body shop. Along Grand View Boulevard to the west is an approximately two-story commercial office building, and north and west of that building are single-family homes generally fronting Herbert Street and Herbert

Way. North of the Project Site, along Grand View Boulevard, are two apartment buildings, north of which are single-family residences fronting Herbert Street. North of the Project Site, from approximately mid-block to Inglewood Boulevard and separated from the Project Site by a tall sound wall, are two-story apartment buildings. Immediately east of the Project Site, along Washington Boulevard and extending to Inglewood Boulevard, is a two-story Kaiser Permanente medical office building and its associated parking lot and three-story parking structure. South of the Project Site, across Washington Boulevard, is a mix of one and two-story commercial retail and office uses, some with second-story apartments, as well as a two-story apartment building.

PROJECT HISTORY

The City of Culver City granted a CUP (case no. CUP P-1999017) to The Help Group in 1999 to operate two private schools (Village Glen, now known as THG West; and Summit View) with a combined enrollment of 400 students with special needs. In 2011, the City granted a modification to the CUP (Case no. CUP/M P-2011175; the “Current CUP”) that expanded enrollment to 600 students in lieu of the 650 requested, and permitted a maximum of 230 staff for both schools. The facilities are collectively referenced as the “**Campus.**”

To ensure that no significant traffic impacts occur, the Current CUP includes, among other measures, implementation of a Traffic Management Program for the school. Among other things, the Traffic Management Program establishes staggered drop-off and pick-up times, ingress and egress routes, and queueing locations; prohibits queueing or student drop-off/pick-up along metered street parking; specifies paths of travel; and, with very limited exceptions, prohibits students driving to the Campus.¹

City staff has confirmed compliance by The Help Group with its conditions of approval. As of February 2015 only Conditions 52 and 65 remained outstanding. In April 2015, The Help Group submitted a compliance report and video footage, consistent with Condition 52 of the Current CUP,² to the City’s Department of Transportation to confirm compliance with the Traffic Management Program. The report concluded—and the Department of Transportation concurred after observing drop-off and pick-up operations—the Campus was in full compliance with its drop-off and pickup policies.

Consistent with Condition 65, The Help Group also submitted to the City a draft plan for addressing, among other points, an education program, the use of employee identification for vehicles, and a neighbor hotline for complaints regarding vehicle intrusion into neighborhoods. The City Planning Department has acknowledged receipt and review of the draft plan.

Condition 53 of the Current CUP limits enrollment to 600 students (650 were originally requested), and Condition 59 stated that The Help Group would not request future enrollment increases and would limit its operations to the existing campus boundary. Although The Help Group originally agreed to the condition as a condition of a 650 student enrollment, The Help Group anticipated reaching the lower 600 student enrollment within three to five years.

¹ Condition 54 of the Current CUP permits up to 15 students to drive to the Summit View School.

² Condition 52 requires the provision of a follow-up report on the Traffic Management Program after six months and after one year of “full operation.” Here, full operation refers to the Campus reaching its 600 student capacity. The Campus submitted the report prior to reaching an enrollment of 600 students.

However, the unanticipated and permanent closure in 2014 of the Westview School, another dedicated specialneeds school that operated continuously in West Los Angeles since 1975, resulted in about 110 students with special needs suddenly losing their instructional facility, with no alternative in the Los Angeles area that would meet their unique educational needs. Consistent with its mission, and to ensure the continued and uninterrupted access for these students to needed services that would otherwise have been unavailable, The Help Group agreed to enroll 55 of those students at the Campus in summer 2014, and the remaining 55 students enrolled in the fall of 2014. This unanticipated and substantial enrollment (nearly one fifth of the total, and over half of the majority of the enrollment increase granted in 2012) has resulted in the Campus reaching the 600 student limit far earlier than anticipated, leaving no excess enrollment space for new students who either previously lacked access to a dedicated special-needs school or are newly diagnosed with a learning or developmental disability that traditional public schools cannot accommodate. Accordingly, The Help Group submits this application to modify Conditions 53 and 59 and increase its enrollment to 650 students, for which the Campus improvements proposed in 2011 were originally designed and programmed to accommodate. Consistent with Condition 59, The Help Group does not propose an expansion of the physical campus. The Help Group also does not propose to expand the buildings within the campus.

FINDINGS

The Culver City Municipal Code (“CCMC”) permits the granting of a CUP upon making the following findings, all of which are supported in this case by substantial evidence.

- (a) The proposed use is allowed within the subject zoning district with the approval of an administrative use permit or conditional use permit and complies with all applicable provisions of this title and the CCMC.**

The Project Site is zoned CG (General Commercial), which conditionally permits a private school (CCMC § 17.220.015). Consistent with this designation and with prior CUP grants from the City (CUP P1999017 and CUP/M P-2011175), The Help Group has operated the Campus at its present location for over 15 years. As described above, the current enrollment of the Campus is 600 students, and the Project would increase this enrollment by 50 students, or less than ten percent. This minor increase would continue to comply with all applicable provisions of the CCMC and would not affect the compliance of the existing Campus.

- (b) The Proposed Use is Consistent with the General Plan and any Applicable Specific Plan.**

The General Plan designation for the Campus is “General Corridor,” which encourages a range of neighborhood- and community-serving commercial uses. (General Plan, p. LU-20.) The Campus is not subject to a Specific Plan. The Campus serves and would continue to serve a historically underserved and vulnerable portion of the community— children with special needs. Additionally, the GC zoning designation of the Campus is consistent with the Corridor Commercial General Plan land use designation and conditionally permits private schools. Consistent with the zoning and prior CUP grants from the City, the Campus has operated in its present location for over 15 years and in compliance with the conditions imposed. The proposed

enrollment increase, which does not involve any expansion of building floor area, involves no change in use and would maintain the existing consistency of the Campus with the General Plan.

(c) The design, location, size, and operating characteristics of the proposed use are compatible with the existing and future land use in the vicinity of the subject site.

The Campus, which The Help Group has operated for about 15 years, comprises a two- to four-story former medical center complex, with perimeter walls; some modifications to the structures, including some interior remodeling for instructional, administrative, and support space; as well as a previously approved rooftop play area, located away from the residential uses to the north of the Campus and enclosed relative to those uses. All school activities occur and would continue to occur within the previously approved campus area, consistent with the original conditional use permit for the Campus. The updated (2011) Traffic Management Program, which was developed to accommodate 650 students, could continue to govern traffic operations at the Campus.

Although an updated traffic impact analysis has been prepared, the mitigated negative declaration (“MND”) adopted by the City for the 2011 CUP evaluated the environmental effects of a 650 student enrollment and remains relevant to this request. The MND and the supplemental technical studies determined that no significant impacts would result from a 650 student enrollment and the proposed associated building improvements. Among other things, the MND determined that a 650 student enrollment would not result in a significant noise impact, even if the City required no mitigation measures. Despite the lack of any requirement for mitigation, The Help Group volunteered to construct a 14-foot tall wall to further reduce sound levels experienced by abutting residences in the City of Los Angeles. Studies demonstrated that barrier would reduce noise experienced by those residences to at least 15 decibels *lower* than the noise limits in the City's noise element. The studies also concluded the enclosure of the rooftop playground by parapet walls would reduce noise experienced by abutting residents to 15 to 20 decibels below then-existing noise levels at the Campus.

Similarly, the traffic study prepared to support the MND determined that an enrollment of 650 students would not result in any impacts to nearby street intersections. The Campus would continue to implement the existing Traffic Management Program, which would further ensure that drop-off and pick-up activities will not obstruct local roadways or result in neighborhood intrusion of Campus-related traffic.

Given the facts above, the lack of impact to nearby sensitive uses, the location, design, and size of the Campus, at 650 students—the compatibility of the Campus with other existing and anticipated uses in the vicinity is clearly demonstrated.

(d) The subject site is physically suitable for the type and intensity of use being proposed, including access, compatibility with adjoining land uses, shape, size, provision of utilities and the absence of physical constraints.

The proposed enrollment increase does not include any increase in floor area. The Campus, which consists of buildings that pre-date The Help Group schools, would remain in its present form. The existing buildings on the Campus, which the prior CUPs approved for private

school uses, would accommodate the modest (less than ten percent) increase requested here. Further, as described above in paragraph (c), prior environmental analysis of the same enrollment level concluded that no significant impacts would result. Therefore, the Campus is and remains suitable for the type and intensity of use proposed.

- (e) The establishment, maintenance or operation of the proposed use will not be detrimental to the public interest, health, safety, or general welfare or injurious to persons, property, or improvements in the vicinity and zoning district in which the property is located.**

As described above in paragraphs (b) to (d), the existing and proposed enrollment levels at the Campus were previously determined by an MND and supplemental technical studies not to result in significant impacts related to health, safety, or welfare in the vicinity or broader zoning district, given implementation of project design features and recommended mitigation measures.

Moreover, The Help Group's students are subject to federal and state protections, including the Americans with Disabilities Act, rendering them a protected class. The federal Individuals with Disabilities Education Act ("IDEA") mandates a free and appropriate education for children with special needs. When local public schools cannot adequately meet a child's special needs, IDEA mandates placement in a private school such as those operated by The Help Group, with funding provided by governmental sources. Approximately 95% of The Help Group students fall under the IDEA mandate and pay no tuition or fees. Thus, the additional enrollment would permit The Help Group to assist a greater number of a protected class of children in an established and safe environment, further promoting the public interest.