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November 12, 2015

VIA E-MAIL

Chair David Lachoff
Vice Chair David Voncannon
Member of the City Planning Commission
9770 Culver Boulevard, 2nd Floor
Culver City, CA 90232
Attn: Thomas Gorham

Re: CUP/M-2015066
The Help Group School: CUP Modification
12095-12101 Washington Blvd. and 4160 Grand View Blvd.
Hearing date: November 18, 2015

Dear Chair Lachoff, Vice Chair Voncannon, and Honorable Members of the Planning Commission:

We represent The Help Group, a nonprofit organization dedicated to providing educational opportunities for children with a wide range of special needs. The Help Group operates day school programs for students with special-needs at the above referenced Campus. The Help Group proposes to modify its existing Conditional Use Permit ("CUP"; case CUP/M-2011175) to permit an increase in enrollment of 50 students, from 600 to 650. This request, which represents an increase of less than ten percent, is consistent with its prior request in 2011, with the environmental analysis and neighborhood protection measures prepared at that time, and with the improvements completed as part of the 2011 CUP modification. No new construction or expansion of any existing facilities at the Campus would occur. The Campus can accommodate the proposed enrollment increase without any significant effects on nearby residents. Although this is a small enrollment increase, it has the potential to make a tremendous difference in the lives of the additional children and families the Campus could serve throughout the years ahead. The need for the services offered by The Help Group—which serves an especially vulnerable and under-served group—remains pressing. For all of these reasons, we ask that you approve the nominal enrollment increase now proposed.

1. The Increase in Enrollment is Needed and Warranted.

As part of the 2011 CUP Modification process, The Help Group requested an enrollment of 650 students. Condition 53 of the current CUP ultimately limited enrollment to 600 students. The unanticipated and permanent closure in 2014 of the Westview School—another

dedicated special-needs school that operated continuously in West Los Angeles since 1975—resulted in about 120 students with special needs suddenly losing their special education day school program. There were few or no appropriate alternatives that could meet their unique educational needs in the Los Angeles area.

Therefore, consistent with its mission, and to provide access to needed services that would otherwise have been unavailable, The Help Group was asked and agreed to enroll 110 of those students. Approximately half enrolled at the Campus in the summer of 2014. The remaining students enrolled in the fall of 2014. This unanticipated and substantial enrollment increase represented nearly one fifth of the total enrollment of the schools, and about half of the enrollment increase granted in the current CUP. This resulted in the Campus approaching the 600 student limit far earlier than anticipated, with a current enrollment of 587.

Therefore, although Condition 59 of the current CUP states that The Help Group would not request future enrollment increases and would limit its operations to the existing campus boundary, The Help Group respectfully requests modification of Conditions 53 and 59, to increase enrollment to 650 students. The Campus improvements proposed in 2011 were originally designed and programmed to accommodate 650 students; therefore, consistent with Condition 59, The Help Group does not propose any physical expansion of the Campus and does not propose any construction of any kind within the Campus. ***Further, the Help Group acknowledges that the capacity of the Campus will be reach at 650 students.***

As stated above, the enrollment limitation was originally intended to reflect no request beyond an ultimate enrollment of 650 students. Moreover, as described further below, the 600 student limitation did not relate to any environmental or neighborhood impacts and the proposed increase would not create any new significant impacts. Therefore, the proposed enrollment increase would maintain consistency with the 2011 request and would, as a practical matter, reflect the originally requested and planned capacity of the Campus.

2. The Existing School Does Not and Will Not Have Significant Impacts on Neighboring Residents.

Among other things, the mitigated negative declaration (“MND”) prepared for the 2011 project determined that a 650 student enrollment would not result in a significant noise impact, even if the City required no mitigation measures. Similarly, the traffic study prepared to support the MND determined that an enrollment of 650 students would not result in any significant impacts to nearby street intersections. The Help Group continues and will continue to implement the existing Traffic Management Program, which would continue to ensure that drop-off and pick-up activities will not obstruct local roadways or result in neighborhood intrusion of Campus-related traffic.

Further, although no mitigation was required, The Help Group volunteered to construct a 14-foot -tall wall to further reduce sound levels experienced by abutting residences to the north, in the City of Los Angeles. Studies prepared in 2011 demonstrated that barrier would

reduce noise substantially below 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 substantially below then-existing noise levels at the Campus.

Aside from the voluntary measures above, the existing CUP already contains a number of measures to ensure, among other things, that no significant traffic or noise impacts would occur, protecting the residents adjacent to and near the Campus. For example, the Current CUP includes 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. Notably, the taxi and bus drivers for the students are "regulars"; as a result, The Help Group is able to maintain a long-term relationship with each driver and ensure continued compliance with the Traffic Management Program.

City staff has confirmed compliance by The Help Group with its conditions of approval. As of February 2015 only two conditions—both of which were required when the school reached full enrollment—remained outstanding. As the school was near its maximum enrollment, The Help Group provided the required materials. The City Traffic Engineer and the City Planning Department have acknowledged receipt and review of the materials, and the Department of Transportation conducted field visits of the pick-up and drop-off operations at the school. No further measures were deemed necessary to address traffic.

Given the lack of impact to nearby residences, the location, design, and size of the Campus, at 650 students, is compatible with other existing and anticipated uses in the vicinity.

3. The Planning Commission Should Approve the Enrollment Increase.

The Help Group serves an especially vulnerable and under-served group, and the recent closure of another long-operating special needs school has made the state of special needs education even more pressing. The Campus can accommodate the proposed enrollment increase without any new construction and without any new significant effects—including traffic—on nearby residences, to whom The Help Group has remained consistently responsive. With this enrollment increase, the capacity of the schools will have been reached. For all of these reasons, we ask that you approve the nominal enrollment increase now proposed.

Sincerely,



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