ITEM 3 PRC PUBLIC COMMENT 001

From: <u>Jane Christopherson</u>

To: <u>Clerk of the Board Public Email</u>

Cc: Jack Burrows; harastepat@aol.com; Cesar Peralta; Joseph Marcinek; Judith Scott; Judy Goldbar; Jane

Christopherson; Shen. Jessie

Subject: Comments for 3.10.2021 Project Review Committee meeting

Date: Monday, March 8, 2021 2:24:58 PM
Attachments: Zoning & written conditions & code.pdf
Written conditions and the case.pdf

EXTERNAL EMAIL: If unknown sender, do not click links/attachments.

Item 3. PLNP2019-00333 Mosaic Law Congregation and Shalom School Use Permit Amendment

Please distribute copies of the attached documents to members of the Committee. Our neighborhood committee respectfully requests that the members read our documents before their meeting.

As I understand it, Brian Holloway must recuse himself since he is a paid consultant to Mosaic Law.

Thank you,

Jane Christopherson 2254 Sierra Blvd. Sacramento, CA 95825

ZONING CODE APPLICABLE TO THE PROPOSED MOSAIC LAW USE PERMIT AMENDMENT

Before the March 1st Arden-Arden CPAC (A-A CPAC) discussion of the PLNP2019-00333 Mosaic Law Congregation and Shalom School Use Permit Amendment (Amendment), a neighborhood committee had submitted to the A-A CPAC a list of requested written Conditions for inclusion in the Amendment. (Please see the written conditions document also attached with this email.)

After much discussion, a CPAC member asked what the neighborhood community's recourse would be if there were no written conditions in the Amendment and Mosaic Law continued its disruptive behavior negatively impacting the neighborhood. A County representative replied that the neighborhood would have to contact Zoning.

The neighborhood committee did some research on applicable zoning code for our residential neighborhood and specifically for the Mosaic Law's RD-20 zoning. We discovered there is significant protection vis a vis Conditional Use Permits required in the zoning code applicable to our residential neighborhood. Whether this Amendment is viewed as a change to a Place of Worship or a Private Social Hall in an RD-20 zone, the use is allowed only if reviewed and approved in accordance with procedures of Conditional Use Permits, and shall be evaluated as to its probable effect on adjacent properties and surrounding areas, among other factors, and may be approved or denied based on appropriate findings.

We believe, given the evidence we have provided of the very negative effects of previous Mosaic Law events on the neighborhood, that the neighborhood committee's proposed written conditions should be included in ANY amendment to the Mosaic Law Use Permit.

Following are copies of some pages from the Sacramento County Zoning Code, excerpts of which are discussed below.

As you will note in the Table of Allowed Uses under:

- 3.2.2.B (bolding and underlining added)
 - "C" in a cell indicates that in the respective zoning district the use is allowed only if reviewed and approved in accordance with the procedures of Section 6.4.3, "Conditional Use Permits". Conditional Uses are subject to all other applicable regulations of this Code, including the use-specific standards in this Chapter and the requirements of Chapter 5, "Development Standards."
 - b. "CZ: indicates that the decision authority for the Conditional Use Permit shall be the Zoning Administrator, unless the bundling rules, described in the User Guide, result in a high decision body.
 - c. "CP indicates that the decision authority for the Conditional Use Permit shall be the Planning Commission, unless the bundling rules, described in the User Guide, result in a high decision body.
 - 2. A "C" designation in a given district does not constitute an authorization or an assurance that such use will be permitted.

 Rather, each Conditional Use Permit application shall be evaluated as to its probable effect on adjacent properties and surrounding

<u>areas, among other factors, and may be approved or denied based</u> <u>on appropriate findings.</u>

The attached colorful table from page 3-9 shows that in zone RD-20:

- Places of Worship have a CZ designation.
- · Private Social Center has a CP designation.

The two most interesting facts are:

- 1. No matter whether Mosaic Law's proposed Amendment is considered a change in the use of a Place of Worship or the establishment of a Private Social Center as an incidental use, there must be written conditions of use.
- 2. The Conditional Use permit must consider the probable effect on adjacent properties and surrounding areas, among other factors, and may be approved or denied based on appropriate findings.

Therefore, Mosaic Law's proposed Amendment must contain written conditions of use addressing the effects of the proposed "event center" on the adjacent properties, the neighborhood.

Also pertinent is section 3.7.34.H. Event Center/Reception Hall on page 3.94. Even though this section is written specifically for an event center or reception hall in the LC or GC zoning districts and not specifically for a church social hall in an RD-20 zoning district, the conditions required are applicable to the "event center" defined by Mosaic Law in its Amendment because it asks to be a defacto Event Center even if just intermittently:

- a. Conditions of approval may include restricted hours and, frequency of events, restrictions on alcohol sales, additional on-site security, and additional parking or traffic controls, if needed to ensure minimal nuisance impacts to surrounding properties.
- 3. All events are subject to the Sacramento County Noise Ordinance.
 Violation of the Noise Ordinance is grounds for suspension or revocation of business licenses and/or Conditional Use Permit.

We believe that these citations are grounds for inclusion in the proposed Mosaic Law Amendment of the written conditions proposed by our neighborhood committee and included in this email.

We have one additional question. Since Event Center is only allowed in LC and GC zoning districts and not listed anywhere in the RD-20 Allowed Uses (even with a Conditional Permit), should Mosaic Law be allowed to use "Event Center" in its business license and/or advertising? Wouldn't that name suggest it is competing with for-profit-businesses?

Thank you.

Comment to Project Review Committee, page 3 of 3 March 8, 2021

Jane Christopherson 2254 Sierra Blvd Sacramento, CA 95825 (916) 752-0325

3.2. TABLES OF ALLOWED USES

3.2.1. Table Organization [AMENDED 04-07-2016]

In Tables 3.1, 3.2, and 3.3, land uses and activities are classified into general use categories, use subcategories, and specific use types based on common functional, product, or physical characteristics such as the type and amount of activity, the type of customers or residents, how goods or services are sold or delivered, and site conditions. This classification provides a systematic basis for assigning present and future land uses into appropriate zoning districts.

3.2.2. Explanation of Table Abbreviations

3.2.2.A. Permitted Uses

"P" in a cell indicates that the use is a "Permitted Primary Use" and is allowed by right, subject to complying with the regulations of the respective zoning district in which the use is located, including Design Review, as provided by Section 6.3.2 of this Code.

3.2.2.B. Conditional Uses

- "C" in a cell indicates that in the respective zoning district the use is allowed only if reviewed and approved in accordance with the procedures of Section 6.4.3, "Conditional Use Permits." Conditional Uses are subject to all other applicable regulations of this Code, including the use-specific standards in this Chapter and the requirements of Chapter 5, "Development Standards."
 - a. "MC" indicates that the decision authority for the Minor Use Permit shall be the Planning Director, unless bundling rules, described in the County Zoning Code User Guide (User Guide), result in a higher decision body.
 - b. "CZ" indicates that the decision authority for the Conditional Use Permit shall be the Zoning Administrator, unless the bundling rules, described in the User Guide, result in a higher decision body.
 - c. "CP" indicates that the decision authority for the Conditional Use Permit shall be the Planning Commission, unless the bundling rules, described in the User Guide, result in a higher decision body.
 - **d.** "CB" indicates that the decision authority for the Conditional Use Permit shall be the Board of Supervisors.
- 2. A "C" designation in a given district does not constitute an authorization or an assurance that such use will be permitted. Rather, each Conditional Use Permit application shall be evaluated as to its probable effect on adjacent properties and surrounding areas, among other factors, and may be approved or denied based on appropriate findings.

3.2.2.C. Accessory Uses

"A" in a cell indicates that in the respective zoning district the use is allowed by right as an accessory use, without special conditions other than those imposed upon other accessory uses by right in the zoning district. Accessory uses are subject to all other applicable regulations of this Code, including Section 3.9, "Accessory Uses."

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²⁵ In the Agricultural, Agricultural-Residential, and Residential zoning districts, places of worship or other religious institutions exceeding 150 person seating capacity shall require a Conditional Use Permit by the Planning Commission.
26 In the Agricultural, Agricultural-Residential, and Residential zoning districts, private schools exceeding 100 students shall require a Conditional Use Permit by the Planning Commission.
27 See footnote 26.

Sacramento County Division of Building Permits and Inspections.

3.7.4.G. Internet Cafes

Internet cafes shall be permitted in all commercial and mixed-use zoning districts, subject to a Conditional Use Permit by the Planning Commission, and only if the use does not involve sweepstake games, gambling, or other activities/games that violate state or federal regulations.

3.7.4.H. Event Center/Reception Hall [ADDED 12-01-2017]

- 1. An event center or reception hall in the LC or GC zoning districts with capacity exceeding 300 persons (per Fire Department occupancy load calculations) shall be subject to a Conditional Use Permit by the Zoning Administrator.
 - a. Conditions of approval may include restricted hours and, frequency of events, restrictions on alcohol sales, additional on-site security, and additional parking or traffic controls, if needed to ensure minimal nuisance impacts to surrounding properties.
- 2. There shall be no on-sale of alcoholic beverages at the facility except as allowed by one-day permits related to specific events and issued by the Sheriff's Department.
- All events are subject to the Sacramento County Noise Ordinance. Violation of the Noise Ordinance is grounds for suspension or revocation of business licenses and/or Conditional Use Permits.
- 4. All outdoor areas used for event activities (patios, designated smoking areas) must be located at least 100 feet away from residentially zoned property.
- 5. Parking requirements are as described for Auditoriums, Exhibition Halls, and Public Assembly Uses in Table 5.21 of Section 5.9.2.B. Shared parking arrangements for event centers in commercial strip centers may be considered with a Special Development Permit.

3.7.5. Financial Institutions

3.7.5.A. Financial Institution [AMENDED 12-01-2017]

Permitted in the listed zoning districts, if in compliance with the standards in Section 3.9.3.V, "Drive-Throughs."

3.7.6. Lodging Uses

3.7.6.A. Bed and Breakfast Inn

Permitted subject to issuance of a Conditional Use Permit by the Zoning Administrator, except in the agricultural and agricultural-residential zoning districts, the Planning Commission shall hear all projects, in addition to complying with the findings listed in Section 3.6.0. The use permit may authorize limited ancillary social gatherings such as conferences, weddings, fundraisers, and other similar events attended by any nonlodger, subject to any conditions imposed including, but not limited to, restrictions on the frequency and timing of events and the maximum number of persons per event. Except as expressly authorized in the use permit, such activities are prohibited.

WRITTEN CONDITIONS, FINDINGS, AND LANGUAGE FOR

PLNP2019-00333 Mosaic Law Congregation and Shalom School Use Permit Amendment

February 26, 2021

The neighborhood committee (representing many interested neighbors in the area of Sierra Blvd. near the Mosaic Law Congregation and Shalom School) requests the following written Conditions, Findings, and Language be included in PLNP2019-00333 Mosaic Law Congregation and Shalom School Use Permit Amendment (Amendment) and any future amendments to such Use Permit.

These conditions reflect:

- Statements and intentions that Mosaic Law has included in its various submissions for this Amendment (e.g., Project Description, etc.), or
- Conditional language included in the existing PLNP2012-UPP-DRS-00206 Use Permit and Design Review for the Unitarian Universalist Society of Sacramento (UUSS), a neighboring non-profit religious entity in the same RD-20 zone of Sierra Blvd., which is permitted to hold non-congregational events.

CONDITIONS limiting frequency of non-congregational events:

- a. No non-congregational event shall be held at the same time as any congregational event or during school hours or school events.
- b. No more than two non-congregational events of 4-400 attendees may be held in any one-month period.¹

CONDITIONS limiting event hours and noise:

- a. All non-congregational events and activities associated with rental agreements inside Mosaic Law facilities shall conclude no later than 11 p.m. on Friday or Saturday and no later than 10 p.m. Sunday through Thursday, excluding associated clean-up. An additional thirty minutes shall be allotted for clean-up. During these events, there shall be on-site personnel or designated congregational members to monitor event activities.
- b. All outdoor events shall conform minimally to the 10 p.m. noise curfew required by County Ordinance.
- No outdoor events are allowed to use amplified music or loudspeakers on Mosaic Law property.

¹ Mosaic Law proposes a limit of 70 non-congregational events per year (which is more than one per week). We request a maximum of two such events per month because of the traffic already generated by Shalom School five days a week and by the Mosaic Law congregation at least once a week, plus congregational events, school events, and high holiday events. Additionally, The State Board of Equalization states that "Occasional", as defined in section 214(a)(3)(B(i), "means use of the property on an irregular or intermittent basis…" and more than once a week would certainly not qualify as "irregular or intermittent", regardless of how many organizations are involved. (https://www.boe.ca.gov/proptaxes/pdf/880_0582.pdf)

d. All events with inside amplified music shall provide door monitors at the front entrance to ensure that the doors remain closed during the event except for guests arriving and departing the building.

CONDITIONS limiting event attendance:

- a. Attendance at any non-congregational Mosaic Law event shall be limited to 400 persons in total; once 400 attendees have entered, no new persons may enter even if some people leave.
- b. All advertising, on-site signage, event contracts, and parking attendants shall direct event attendees to park:
 - Only on Mosaic Law grounds or, when permitted, UUSS parking areas and
 - ii. NOT on Sierra Blvd., or adjacent side streets, or the office complex at 650 Howe Avenue
 - iii. And to behave respectfully and quietly while going quickly to and from their parked vehicle.

CONDITIONS requiring door guards and private security personnel for ANY event:

- a. Any event on Mosaic Law grounds shall require one door guard for each 100 attendees.
- b. Any event on Mosaic Law grounds shall require one security guard for each 75 attendees. If alcohol is served, the number of security guards and the ratio of security guards to attendees shall increase (e.g., 1/50 instead of 1/75).
- c. Two parking lot attendants shall be present at each parking lot entrance/exit for the duration of any event.

FINDING:

The granting of the Use Permit will not, under the circumstances of the particular case, be detrimental to the health, safety, peace, morals, comfort, or general welfare of persons residing or working in the neighborhood of such proposed use or be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the County.

LANGUAGE – (We also request that the following language from the original 2005 Mosaic Law Congregation Use Permit be included in any amendment to such Use Permit):

THIS ACTION DOES NOT RELIEVE THE APPLICANT OF THE OBLIGATION TO COMPLY WITH ALL ORDINANCES, STATUTES, REGULATIONS AND PROCEDURES. ALL COSTS INCURRED BY THE COUNTY TO ENFORCE THE CONDITIONS LISTED IN THIS PERMIT SHALL BE THE RESPONSIBILITY OF THE PERMIT HOLDER AND/OR PROERTY OWNER. THE ABOVE USE WILL NOT BE CONDUCTED TO CONSTITUTE EITHER A PUBLIC OR PRIVATE NUISANCE. VIOLATION OF ANY OF THE FOREGOING CONDITIONS WILL CONSTITUTE GROUNDS FOR REVOCATION OF THIS PERMIT. A CONDITIONAL USE PERMIT, IF NOT 'USED FOR THE PURPOSE FOR WHICH IT WAS GRANTED, SHALL LAPSE AND SHALL BECOME VOID THREE YEARS FOLLOWING THE DATE ON WHICH THE PERMIT BECAME EFFECTIVE, UNLESS BY CONDITION OF THE PERMIT A GREATER TIME IS ALLOWED, OR UPON THE EXPIRATION DATE OF A VALID BUILDING PERMIT OBTAINED AFTER THE GRANT OF THE CONDITIONAL USE PERMIT, WHICHEVER DATE IS LAST TO OCCUR.

The Case for Written Conditions for PLNP 2019-00333 Mosaic Law Congregation and Shalom School Use Permit Amendment

A precedent for written conditions has been set by the Conditional Use Permit 12-UPP-DRS-00206 of a neighboring church, the Unitarian Universalist Society of Sacramento (UUSS), approximately 1,000 feet northeast of Mosaic Law Synagogue on Sierra Blvd. The conditions of the UUSS Use Permit are shown in Attachment 1. The neighborhood faced challenges with UUSS events several years ago and conditions of operation were developed to ensure that the actions of the permit holder would not be detrimental to the health, safety, peace, morals, comfort, or general welfare of persons residing or working in the neighborhood of such proposed use or be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the County.

Additionally, written conditions for the pending Mosaic Law Use Permit
Amendment are necessary given the history of Mosaic Law's bad behavior in its use
of its "Event Center" in violation of its Use Permit in ways that have been
detrimental to the health, safety, peace, morals, comfort, or general welfare of
persons residing or working in the neighborhood. Whether due to frequent
changes in leadership (presidents serve only a two-year term), unsupervised or
uncontrolled event managers, increased need for funds, or other motives, Mosaic
Law has consistently broken promises and the conditions of its current Use Permit.
No matter how sincere, contrite, and conciliatory the current administration appears
to be, we have seen it all before. Our purpose is to preserve the integrity, sanctity,
and value of our RD-20 zoned residential neighborhood by asking that written
conditions be added to the Mosaic Law's Use Permit Amendment to prevent and
punish any repeat of the destructive events we have had to live through in the past
several years.

Following is a brief history of Mosaic Law and Shalom School, followed by the neighborhood's experiences with events at the "Event Center". A pattern will emerge that seems to indicate that all the actions of Mosaic Law were planned, deliberate, and lacking in concern for the welfare of the RD-20 neighborhood in which its property resides.

Mosaic Law's Articles of Incorporation:

First filed August 22, 1940, the articles define the purpose of the Mosaic Law Congregation corporation to establish and maintain a synagogue for people of the orthodox or conservative Jewish faith, to establish, maintain and conduct schools for religious instruction, and to organize and operate as a non-profit, etc.

Amendments on December 7, 1964, August 4, 1978, and December 20, 2000, among other goals, more clearly defined the dedication to religious, charitable and educational purposes to specifically meet the requirements for the California Welfare exemption provided by Section 214 of the Revenue and Taxation Code (for property used exclusively for charitable, hospital, or religious purposes owned or held in trust by nonprofit organizations operating for those purposes.)

Use Permits

Except for the 9/19/2019 Temporary Use Permit, all use permits and amendments to date have authorized the use of the property at 2300 Sierra Blvd. only for religious, congregational, and school events.

July 3, 1964 - Use Permit to Mosaic Law Congregation for the existing facilities on the project site was approved.¹

February 17, 1971 – A three-lot split was approved.3

January 31, 2005 – 03-UPP-PRP-0630 Use Permit and Special Review of Parking was approved.³

Expansion of an existing church facility allowing a pre-Kindergarten through 8th grade private school on property zoned RD-20, subject to findings and conditions recommended by staff, and the included amendments.

Expansion also consisted of the addition of a new 2-story, 24,000± square foot sanctuary and <u>social hall</u>.

The Special Review of Parking <u>reduced the required parking from 330 spaces</u> to 281 spaces with the justification that "...the two principal uses (church and <u>school</u>) are never in operation at the same time. The school operates Monday to Friday. Church services are on Saturday."

Note that there is no mention of non-congregational events or an event center.

¹ 03-UPP-PRP-030630 Mosaic Law Congregation and Shalom School Use Permit and Special Review of Parking, page 4-5.

September 19, 2019 PLNP2019-00289 Temporary Use Permit (TUP)

When it was discovered that Mosaic Law was booking non-congregational events in breach of its Use Permit (and to the detriment of the neighborhood) the TUP was granted to allow Mosaic Law to fulfill the contracts it had already booked, up to 10. In the end, Mosaic Law held more than 10 such events.

PLNP 2019-00333 will allow Mosaic Law to have non-congregational events on its property.

Business Licenses

Mosaic Law used a 2016 "mistake" in one of its business license renewals to justify booking non-congregational events on its property. When neighbors began to question how it could be booking monstrous size "raves" at its property, Mosaic Law's "event center" manager pointed to this business license as authority.

Mosaic Law has created its own names that appear nowhere in its Use Permit or Amendments and which have proven confusing to County employees and even Mosaic Law employees who seemed to believe these names alone allowed the generation of business outside the scope of Mosaic Law's use permit.

Mosaic Law has used the names "Event Facility" and "The Center at Twenty-Three Hundred" in the activity areas of its Business Licenses even though the Business Name on its licenses is Mosaic Law. We assume that Mosaic Law has applied for fictious name registration for either or both of these labels. We heard a Mosaic Law board member express pride at the name recognition The Center has gained, which was generated, of course, through the booking of non-congregational events and widespread marketing of these events, at the expense of the neighborhood.

Per the County of Sacramento (County), Mosaic Law has two types of liquor licenses, one for the congregation and one for catering. When one of these licenses, GNB32010-47789, was renewed in 2016, the County Inspector changed the activity description to the name on the building, "The Center at 2300", and removed the condition that the site had to be used only for church activities. Per County Principal Planner Wendy Hartman's 9/26/2019 email (Attachment 2), "(we are not sure why this happened)". However, since a Mosaic Law event coordinator used this license as authority to book non-congregational events, it seems likely that a Mosaic Law employee made the suggestion for the change. Per Ms. Hartman, "When their license next came up for renewal in 2019, their business license was denied because

it had become apparent that the business's activities did not fall within the scope of the approved use permit or within what is allowed by-right in the Zoning Code."

Documented disruptive Mosaic Law events

The events listed here are a fraction of the non-congregational events held by Mosaic Law, but these were well documented and are among the most egregious violations of the neighborhood. Overall, there was an average of six large and loud events per year.

Friday, September 11, 2015 Although this was not the first disturbing event at Mosaic Law, it is the first we documented. It took place on Friday, September 11, 2015. We do not know if the event was a congregational event or not, but it is included here to show how much the neighborhood was disturbed and how we chose to handle the matter.

Four emails shown as Attachments 3a through 3d are attached. Each email is informative, but we want to direct your attention particularly to 3d, which lists all the Mosaic Law members and employees that we spoke with multiple times, including the rabbi at the time. The meetings were congenial and respectful on all sides. We were made promises about how the noise would be abated in the future and we were hopeful that things would improve.

May 26, 2019 Overflow crowd at Mosaic Law resulting in several fights in the street after the event ended at 2 a.m. A helicopter, 13 patrol cars, fire track, and paddy wagon were on the scene. Mosaic Law claimed they had 17 security officers on the grounds. Music lasted from 6 pm until 2 am. Program was advertised to teens 15+. Judy Goldbar sent an email to Susan Peters, District 3 Supervisor, explaining the neighborhood's problem and relating her conversation with Michael Rich, Executive Director of the Event Center, in which he told her that he would book anything that would make money for The Center.

June 15, 2019 Overflow crowd at Mosaic Law with crowded parking on neighborhood side streets. Scantily-clad women (brassiere top and thong bottom ONLY). Lots of garbage left on streets, lawns, and in the bushes: broken bottles, condoms, paper, cigarettes.