

LIST OF ATTACHMENTS

Exhibit 1 Planning and Community Development Department Staff Memo the following Attachments:

Attachment A1	Digital archived record for 2014 Conditional Use Permit Hearing: Search Results: HE-14-PL-030 (cob.org)
Attachment A2	Hearing Examiner Order HE-14-PL-030
Attachment A3	2014 Conditional Use Permit Staff Report
Attachment A4	Certificate of Occupancy BLD2014-00116
Attachment A5	As-Built Plan 2015
Attachment A6	Approved Landscape Plan BLD2015-00116
Attachment A7	Documentation of Hearing Examiner Conditions Met Prior to Building Permit Issuance
Attachment B1	Hearing Request Letter
Attachment B2	Conditions Compliance Letter
Attachment B3	Conditions Compliance Analysis
Attachment B4	Owner Letter re DOC Lease
Attachment B5	Bellingham Police Department Call Data
Attachment B6	Bellingham Police Department Call Records
Attachment B7	Bellingham Police Department Memorandum 12.12.23
Attachment B8	Reentry Center Handbook July 2023
Attachment B9	Comprehensive Plan Goals and Policies
Attachment B10	Department of Corrections Letter

**CITY OF BELLINGHAM PLANNING AND COMMUNITY DEVELOPMENT
STAFF MEMO**

HEARING EXAMINER REVIEW MEETING

January 10, 2024

PROJECT NOS: CUP2014-00006, CONDITIONAL USE PERMIT HEARING EXAMINER REVIEW

APPLICANT: Ali Taysi, AVT Consulting, 1708 F Street, Bellingham WA 98225

PROPERTY OWNER: Brian McFarlane, Manager of Garden Street Investments LLC Po Box 29047

PROJECT DESCRIPTION: Hearing in accordance with HE-14-PL-030 Condition #2 to review the on-going operations of an approved existing service care use at 1125-27 North Garden Street. The scope of review is to analyze the use's compliance with the permit conditions in HE-14-PL-030 and the use's continued compliance with the conditional use permit criteria in BMC 20.16.

PROJECT LOCATION: The properties are addressed as 1125-27 North Garden Street (Parcel No. 380331217558000) and legally described as lots 15-16 Block 79 of New Whatcom Lots Subject to Covenant to Bind Properties (AF 2015-1202166). The 13,753 square foot subject site is in Area 2 of the Sehome Neighborhood. The underlying zoning is Residential Multi, Multiple with a high-density designation.

I. CUP REVIEW HEARING BACKGROUND

On September 24, 2014, the Hearing Examiner approved with conditions a conditional use permit to expand an existing nonconforming service care facility¹ at 1127 North Garden Street (operational since 1980) into a new building adjacent to the facility at 1125 North Garden Street (CUP2014-00006 / HE-14-PL-030). The permit required the applicant to submit for a Review Hearing before the Hearing Examiner within five years of obtaining a certificate of occupancy for the new building at 1125 North Garden Street. The applicant has scheduled a Review Hearing to provide an update about their operations and on-going compliance with the permit conditions and conditional use criteria in BMC 20.16.010. The applicant is not proposing any modifications to the current operations approved by the permit.

II. STAFF RECOMMENDATION

¹ The term "service care" is used interchangeably in this Staff Memo with other terms such as "work release" and "re-entry center". The Bellingham Municipal Code (BMC) Section 20.08.020 defines "Service care" as a group residence licensed by the state operated with full-time supervision for housing resident persons who, by reasons of their mental or physical disability, addiction to drugs or alcohol or family and social adjustment problems, require a transitional nonmedical treatment program for rehabilitation and social readjustment. For the purposes of this title, a nonmedical treatment program consists of counseling, vocational guidance, training, group therapy and other similar rehabilitative services but does not include drug and/or alcohol detoxification. Monitoring the taking of prescription medication shall be permitted. The use of medication by any resident shall be incidental to that person's residence in the facility and shall not be a criterion for residence in the facility. Programs providing alternatives to imprisonment, including prerelease, work-release and probationary programs which are under the supervision of a court, state or local agency are included in this definition. Residences occupied by persons qualifying under the definition of "family" and "secure community transition facilities" are excluded from this definition.

Staff have reviewed the 2014 Conditional Use Permit record (**Attachment A1**) and the resulting Hearing Examiner Order, HE-14-PL-030, for the approved Service Care Conditional Use Permit (**Attachment A2**). The Hearing Examiner conditions pertain to controlling the size and scale of the use (Condition 1), mandating a 5-year check-in (Condition 2), mitigating negative impacts of the service care use on the surrounding neighborhood via operational controls (Conditions 3a-e), building and site design to maintain compatibility with neighborhood character (Conditions 4a-j), and finally, police involvement and crime reduction strategies (Conditions 5a-e).

In accordance with Condition #2 of HE-14-PL-030, the applicant has filed the required request for a review hearing before the Hearing Examiner (**Attachment B1**) and prepared an analysis of compliance with the conditional use permit conditions (**Attachment B3**). The applicant's analysis details how each Hearing Examiner condition has been executed and/or continually upheld by the service care use. Additionally, an attestation from the property owner has been submitted (**Attachment B4**) confirming no receipt of complaints since the 2014 Conditional Use Permit approval, and the Department of Corrections (DOC), has submitted a letter detailing the history of the reentry center and management of its operations in accordance with the governing CUP (**Attachment B10**). Staff has reviewed the applicant's analysis of compliance, the owner's attestation, and the DOC letter. Staff agree with the analysis in **Attachments B3 and B10** and find the service care use has maintained the required size and scale of operations (Condition 1), has implemented the required operational controls for management and residents (Conditions 3a-e), has been designed and constructed in accordance with Conditions 4a-j, and has coordinated with the police department for resident screening and incorporated crime reductions strategies into its operations (Conditions 5a-e).

Considering the applicant's demonstrated compliance with all CUP conditions, and staff's supplementary analysis of continued compliance with the conditional use permit criteria in BMC 20.16 (**see section XII**), staff recommend the approved Conditional Use Permit (CUP2014-0006) remain in effect. To ensure relevancy with new state regulations, the previous resident handbook, referenced in condition 3b of the Hearing Examiner Order (**Attachment A2**), should be updated to reflect the current adopted statewide Reentry Center Handbook (**Attachment B8**).

III. PROPERTY AND LEGISLATIVE HISTORY **(Attachment A1)**

- 8/2/1950: Planning Commission granted conversion of 1127 North Garden Street (commonly known as the Delinger House) from a single-family residence to a duplex.
- 1967: Washington's work release program was created by the Legislature. Work release facilities enable certain offenders under the jurisdiction of Department of Corrections (DOC) to serve up to six months of their prison sentence in a residential facility while employed in the community. DOC eligibility criteria restrict who participates in work release. Current statewide policy prohibits offenders convicted of First-Degree Murder or First-Degree Rape from participating in work release unless approved by DOC's screening committee. Offenders are responsible for finding a job within about ten days of arrival at the facility and are typically required to work 40 hours a week. Some work release facilities have established informal partnerships with local employers.

- 1970: The first community-based Work Release opened in downtown Seattle.
- 4/2/1972: City of Bellingham Land Use History Card notes the building used as a 'rooming house with 20 occupants, not including owner or manager, not an Apartment House'.
- 12/8/72: According to City records, a Certificate of Occupancy (CO) was issued for a 'boarding house'. Use limited to 20 people plus one manager. Legal description includes Lots 15-16, Block 79 New Whatcom.
- 9/14/1977: Variance to convert duplex to triplex is denied.
- 10/8/1980: A letter from the Planning Division states that the underlying "Residential High-Density Zone" allows boarding and rooming houses.
- 3/1/1981: File note states this site used for work release. The Police Department determined it was a 30-person rooming house. No formal complaints or enforcement actions are in the record.
- 4/27/1982: Ordinance 9024 makes "Boarding and Rooming Houses" a Conditional Use in the zone underlying this site (Residential, Multi, Multiple). The existing use of this site becomes nonconforming to not having a Conditional Use Permit for operating a Boarding and Rooming House but is legal.
- 3/10/2006: Ordinance 2006-03-018 creates "Service Care" definition and makes it a Conditional Use in Residential, Multi, Multiple zoning designations.
- 2007: The United States Congress passes the "Second Chance Act" which expanded the federal government's role in the provision of reentry services by creating grants for states to implement prisoner reentry programs. Most of the spending authorization was for the operation of state and local programs. One of the key findings of the Act was that transitional jobs programs have proven to help people with criminal records to successfully return to the workplace and to the community, and therefore can reduce recidivism.
- 2007: Washington State Legislature passes ESSB 6157, commonly called the "Reentry Bill". The act sought to reduce offender recidivism by increasing programming for work release centers to better connect offenders with the full range of reentry services to achieve measurable outcomes.
- 9/14/2014: Hearing Examiner approves with conditions a conditional use permit to expand the existing nonconforming service care facility at 1127 North Garden Street with the construction of an adjacent facility at 1125 North Garden Street (CUP2014-00006 / HE-14-PL-030). **(Attachment A2)**
- 8/21/2017: Certificate of Occupancy issued for expanded service care building at 1125 North Garden Street (constructed under BLD2015-00116). **(Attachment A4)**
- Community Work Association (CWA) and the Washington State Department of Corrections (DOC) operated the facility through 5/31/2022 when CWA's contract expired. Residents were transferred to Seattle in May 2022 and the facility has been in warm closure since 6/1/2022 **(Attachment B10)**.
- 6/2023: State funding was secured to operate 1125-27 North Garden Street as a state facility to be operated by DOC personnel **(Attachment B10)**.
- 12/8/2023: Legal Notice for the Hearing Examiner Review Hearing was published in accordance with Title 21. Notice was sent to property owners within 500' of the site, neighborhood representatives, the Bellingham Herald, and all parties of record from the 2014 CUP. Additionally, the required notice sign was installed on the property.
- 12/22/2023: the 14-day public comment period closed. No public comments were received by the City nor the applicant.

There are two Code Enforcement Cases on file for the property and both pertained to expired electrical permits (CIA2015-00178 and CIA2022-0025). In each instance, the permit was issued and never received a final inspection. The cases were resolved in 2015 and 2022 respectively when the work was inspected and approved. There are no Code Enforcement Cases regarding nuisance violations nor permit violations.

VII. APPLICATION

Please refer to **Attachments B1-B10** for the Request for Review Hearing and **Attachments A1-A7** for the 2014 CUP permit application materials.

XII. CONDITIONAL USE CRITERIA (BMC 20.16)

Refer to 2014 Staff report (**Attachment A3**) for comprehensive analysis regarding the CUP Criteria.

Supplemental analysis of the Service Care Uses' ongoing compliance with the criteria in BMC 20.16.010(B)(1-3) and BMC 20.16.010(E)(1-8) is provided below:

BMC 20.16.010 B. states that "Certain uses may be allowed in certain general use types by a conditional use permit granted by the hearing examiner, provided such use is specified under the conditional use subsection of the appropriate general use type handbook and it is clearly shown that:

1. The proposed use will promote the health, safety, and general welfare of the community.

Staff Response: The existing service care facility promotes the health, safety, and general welfare of the community as the use provides a safe and structured option to help individuals re-enter the community through a state run work release program, which is a significant benefit to the local and regional community.

The 2014 CUP record (**Attachment A1**) shows numerous studies document lower cases of recidivism with work release participants (TURNER, S., & PETERSILIA, J. (1996). "Work Release in Washington: Effects on Recidivism and Corrections Costs." The Prison Journal, 76(2), 138-64. and DRAKE, E. (2007) "Does Participation in Washington's Work Release Facilities Reduce Recidivism?" Washington State Institute for Public Policy).

A recent study ("Work Release Benefit-cost Estimates Updated December 2019", Washington State Institute for Public Policy (WSIPP)) calculated whether the benefits of a work release program exceed its costs. The study found a 99% chance of benefits exceeding program costs with a \$5,022 benefit assigned to each participant valued over the program life cycle. Benefits were measured directly and indirectly and include reduction in crime victimization, economic benefits from a more educated workforce, and the benefits from employer-paid health insurance. Similar cost benefit analyses for a variety of criminal justice programs are also published on the Washington State Institute for public policy website.

Per the DOC website, the Bellingham Reentry Center provides in-house resources to residents including resident computer access, transportation to Narcotics Anonymous, transportation to local church services, and a Community Resource Binder (**Attachment B10**). Within the City of Bellingham, there are a variety of supportive services for this population, including chemical dependency treatment, medication-assisted treatment, parenting classes, medical and health treatment, as well as employment training. Per the property owner's letter describing DOC's lease (**Attachment B4**), DOC considers "the Bellingham facility one of their high priority facilities as it is the only halfway house they operate north of Seattle."

There is significant evidence that service care facilities provide significant public benefit to not only the offenders engaging in the program, but the community at large and future generations.

For nearly 44 years, the existing service care use at 1125-27 North Garden Street has been a steppingstone for many offenders on the path to recovery and re-entry into society. The use's programming, location, and access to Bellingham's robust social services synergize to help residents succeed, and the success of this population has positive ripple effects throughout the community.

2. The proposed use will satisfy the purpose and intent of the general use type in which it is located.

Staff Response:

Per BMC 20.32.020(C), "The residential multi multiple designation is intended to accommodate development in those areas which are better suited for higher concentration of population than other residential land use designations. Generally, the high-density residential designation should be used for land near existing or potential high-frequency transit service and/or adjacent to or near employment and commercial areas and not used primarily for the development of detached single-family dwelling units." The existing service care use satisfies the purpose and intent of the residential multi multiple zoning and high-density designation as it is a dense housing form, the site abuts the Downtown Urban Village which is a large employment center offering a variety of vital services, and there are four different Whatcom County Transit GoLine routes servicing streets within one block of the site.

3. The proposed use will not be detrimental to the surrounding neighborhood."

Staff Response:

Neighborhood detriment was thoroughly studied during the 2014 CUP land use application review and the public hearing (**Attachment A1**). To mitigate potential negative impacts to the neighborhood related to the service care use, the Hearing Examiner imposed several conditions of approval on the CUP regarding maximum resident enrollment amounts, site management requirements, building design, landscaping, and lighting requirements, as well as coordination with the Bellingham Police Department for resident screening.

Per the Conditions Compliance Analysis prepared by the applicant, and the detailed chronology of operations prepared by the operator (**Attachments B3 and B10**) the service care use is in compliance with all Hearing Examiner Conditions. "Over the course of the 5+ years of operations since the facility expanded, there have been little if any complaints or concerns from neighboring properties or the Planning Division or Police Department, related to the operations. The fears expressed during the initial CUP Hearing by members of the public have not materialized. [Reentry Center] Residents are advised of the location of the facility within a residential neighborhood upon arrival and must adhere to a strict code of conduct while residing in the facility. Due to the nature of the facility as a halfway house, residents are under 24-hour on-site supervision, and can only enter/exit the facility with approval of the operations manager. To our knowledge there have been no documented occurrences of residents engaging in harassment of passersby from the front porch or any other portion of the property. Noise from the site is limited due to the restrictive hours of activity that residents are allowed" (**Attachment B3**).

Per the property owner's letter describing DOC's lease (**Attachment B4**), since the CUP was approved, he is "not aware of any community concerns that have been raised about the operations of the halfway house, either from immediate neighbors or the broader community."

As evidenced by the lack of code enforcement cases on file with the City, lack of neighborhood complaints received by the owner, lack of complaints received by the Department of Corrections (**Attachment B10**), and the 911 Call Records (**Attachments B5-B6**) showing no crimes against the general public, a conclusion can be drawn that potential detriment to the neighborhood has been avoided since the 2014 CUP was approved, due in large part to the strict compliance with the Hearing Examiner conditions of CUP approval. The existing CUP conditions have proven effective at preventing detriment to the neighborhood and should remain in effect.

BMC 20.16.010.E. notes the hearing examiner shall consider the following factors as to whether the proposed use will:

1. Be harmonious with the general policies and specific objectives of the comprehensive plan.

Staff Response:

The existing service care use is harmonious with numerous goals and policies in the 2016 Bellingham Comprehensive Plan. Fair housing and equitable access to services is a common thread throughout the Land Use, Community Design, and Housing chapters (**Attachment B9**).

The use efficiently uses land in proximity to a full range of urban facilities and services in contextually sensitive manner (G CD-6 and H-3). The existing service care use was developed on an underutilized portion of property close to essential services and in a compact form which did not require extension of public utilities or construction of new roads (LU-35). The project maintained and continues to preserve the Dellinger House, a quality example of historic architecture in the area. The building design of 1125 North Garden Street was developed in accordance with the Hearing Examiner conditions to physically complement the neighborhood character. (G LU-9, LU-76, and H-34).

This area of the Sehome Neighborhood provides housing for a vulnerable population with easy access to excellent transit, a large commercial area, and job resources needed by the residents of this facility (H-15, H-46, and H-47). The multi-family designation has been applied in this urban center where high levels of transit service are present and in areas near employment and commercial centers. The capacity of public facilities and services was also considered when applying this site's multi-family designation. (LU-2, LU-19, G CD-7, and CD-40)

Adherence to the Hearing Examiner's conditions has resulted in a development that accomplishes all of these comprehensive plan goals and policies.

2. Enable the continued orderly and reasonable use of adjacent properties by providing a means for expansion of public roads, utilities, and services.

Staff Response:

The existing service care use does not interfere with the expansion of roads, utilities, or services. The subject site is developed and abuts improved streets and utilities.

3. Be designed so as to be compatible with the essential character of the neighborhood.

Staff Response:

Physical Character Analysis: Sehome Area 2 is described in the Sehome Neighborhood Plan as having a “mix of historic grand and modest late 19th and early 20th century single-family houses, interspersed with substantial historic multi-family apartment buildings, as well as some post-modern multi-family structures that pre-date design review.” The subject site is located on the boundary of Sehome Area 2 directly adjacent to the Downtown Urban Village which houses a variety of residential and commercial uses in buildings of varying scale.

Condition 4 of the hearing examiner order (**Attachment A2**) regulated the site landscaping, architectural design of 1125 North Garden Street, and the preservation of the Dellinger House (1127 N Garden Street) and the historic brick wall on the property. As demonstrated through the building permit review and issuance of final Certificate of Occupancy (**Attachment A4**), these conditions have been met and the existing use continues to maintain compatibility with the physical character of the neighborhood.

Social Character Analysis: Considering the service care facility has been operating for approximately 44 years, staff feel it’s important to note that the neighborhood’s social character is in fact defined and influenced by the use. Even before the Delinger House operated as a work-release program, it’s use as a boarding house provided a similar valuable service to the community – an economical, communal, and transitional form of housing.

Public comments for the 2014 CUP (**Attachment A1**) expressed significant concerns about impacts to the character of the neighborhood regarding noise, harassment, and public safety.

Conditions 3 and 5 of the hearing examiner order (**Attachment A2**) pertained to management of the service care use, coordination with the Bellingham Police Department for resident screening, and resident adherence to a strict code of conduct. As evidenced in **Attachments B3, B4, and B10**, these operational controls have been adhered to by the operator, BPD has effectively engaged in resident screening operations, and the feared impacts to the neighborhood have not been seen and/or have been mitigated.

To ensure relevancy with new state regulations, the previous resident handbook, referenced in condition 3b of the hearing examiner order, should be updated to reflect the current adopted statewide Reentry Center Handbook (**Attachment B8**).

4. Be adequately served by public facilities and utilities including drainage provisions.

Staff Response:

The existing service care use is adequately served by public facilities and utilities including drainage provisions. The site is bordered by two improved streets (North Garden Street and Chestnut Street) with setback sidewalks and street trees, as well as an improved alley. The property is served by City water and sewer and connects to the City stormwater system. Stormwater review occurred under the building permit to ensure compliance with BMC 15.42 and state regulations.

5. Not create excessive vehicular congestion on neighborhood collector or residential access streets.

Staff Response:

The existing service care use generates fewer vehicular trips than similarly sized residential buildings because residents are not allowed vehicles on-site. In compensation for the traffic

generation of the project, a Traffic Impact fee was paid with the building permit for 1125 North Garden Street in accordance with Title 19 (BMC).

6. Not create a hazard to life, limb, or property resulting from the proposed use, or by the structures used therefor, or by the inaccessibility of the property or structures thereon.

Staff Response:

As detailed in the 2014 Staff Report (**Attachment A3**), police data evidenced the Service Care use reduced crime and/or increased conviction in the vicinity of the property. Recent call records have been obtained from the Bellingham Police Department for all 911 calls concerning 1125-27 North Garden Street between 2007 and December 2023 (**Attachments B5 and B6**). This call data was reviewed by DOC who confirmed that in general, the calls were made by the re-entry center managers concerning resident malfeasants (assaults against another resident, drug possession, and attempted suicide as examples) (**Attachment B10**). The calls do not indicate residents committing crimes affecting the general public.

Conditions 5a, 5b, 5d, and 5e of the Conditional Use Permit were intended to mitigate hazards to the public health and safety by requiring the building design incorporate principles of Crime Prevention Through Environment Design (CPTED) such as but not limited to, natural surveillance through window placement, sufficient lighting, and elimination of hiding spaces. CPTED review occurred under the building permit review in accordance with Condition 5a. Moreover, 1125-27 North Garden Street has installed security cameras on the property. DOC staff have provided anecdotes that this camera footage has been used to help with cases of theft in the neighborhood (theft not committed by residents).

Condition 5c of the Hearing Examiner's order requires a member of the Bellingham Police Department service on the resident screening committee. This condition has been satisfied and the BPD screening committee member, Sargent Craig Johnson, has submitted a memorandum detailing his involvement with the committee (**Attachment B7**). The committee meets once a month to review new work release applicants and discuss concerns and recommendations. According to both BPD and DOC, the recommendations of the BPD committee member carry substantial weight.

Based on evidence in the 2014 CUP record, current call data from BPD, and DOC letter recounting the noted events, there is no trend of increased hazards to life and property in the vicinity of the existing Service Care Use related to its operations. The required screening committee and BPD involvement has been assembled and operating in accordance with the CUP condition. Adherence to the Hearing Examiner's conditions has been effective in ensuring the use does not create hazard to life, limb, or property.

7. Not create influences substantially detrimental to neighboring uses. "Influences" shall include, but not necessarily be limited to: noise, odor, smoke, light, electrical interference, and/or mechanical vibrations.

Staff Response:

Service care is a residential use and therefore does not produce odorous, mechanical, or electrical influences. Lighting impacts were controlled by the 2014 CUP condition 5b, and a lighting plan was reviewed with the building permit for 1125 North Garden Street to ensure glare reduction. Noise impacts were also controlled by the 2014 CUP condition 3a, and the required Anti-Harassment Program was drafted, adopted, and signed by all residents (**Attachment A7**).

8. Not result in the destruction, loss, or damage to any natural, scenic, or historic feature of major consequence.

Staff Response:

The potential destruction to the site's natural and historic features was analyzed in the 2014 CUP. Mitigating Conditions 4a, 4e, 4g, 4h, and 4i were imposed by the Hearing Examiner to prevent potential loss or degradation to these features. Conditions pertained to maintaining the historic integrity of the Dellinger House, preservation of the historic stone wall along Garden and Chestnut Streets, and tree retention and replacement requirements.

The building permit, inclusive of a landscape plan, was reviewed for compliance with the CUP conditions. The Delinger House remains well maintained and the historic stone wall has been preserved and incorporated into the site and landscape plan for the development. The large street trees along the property's North Garden Street and Chestnut Street frontages were retained through the building process and remain in good health. Moreover, the planting schedule detailed in the landscape plan submitted with the building permit (**Attachments A5 and A6**) has been adhered to and vegetation has survived and matured.

The existing CUP conditions have resulted in a development that largely enhances the natural, scenic, and historic site elements of the site including trees, landscape features, and the Delinger House.

XIV. CONCLUSIONS

Development must be balanced such that the proposal as a whole promotes public health and safety. Empirical data evidence the public benefit of service care uses. Legislation has been passed at the state and federal level to support and expand service care uses. Finally, City regulations have been adopted to define and allow the use in certain parts of the city.

The existing use at 1125-27 North Garden Street provides a crucial service to the community and northwest region by providing a safe, structured, supervised environment with access to employment, educational, and health programs. The operational controls placed on this service care use in 2014 have proven effective at achieving continued compliance with the CUP criteria and preventing negative impacts of the use.

Following an analysis of compliance with the existing permit conditions, the Conditional Use Permit Criteria, the City's Comprehensive Plan, adopted policies, and lack of public comment, staff conclude that the CUP criteria continue to be met and if the Hearing Examiner concurs, staff recommends the CUP and all previous Hearing Examiner conditions remain in effect and to update condition 3b of the Hearing Examiner order to reflect the current adopted statewide Reentry Center Handbook (**Attachment B8**).

XV. DEPARTMENT RECOMMENDATION

Should the Hearing Examiner find that the existing Service Care Facility described herein and as provided in **Attachments A1-A7 and B1-B10** continues to meet the Conditional Use Permit criteria, staff recommends the Conditional Use Permit (CUP2014-0006) should remain in effect as approved and conditioned in HE-14-PL-030. All permit conditions should continue to be in force and condition 3b be updated to reflect the current adopted statewide Reentry Center Handbook (**Attachment B8**).

Prepared By



Sara Ullman, Planner II
*Planning and Community
Development Department*

Approved for Submittal By



Kurt Nabbefeld, Development Services Manager
*Planning and Community
Development Department*