

Attachment C:

Applicant Response to Appeal letter

Response to Complaints Regarding Conditional Use Permit for Church School at 1252 South Main Street, Angels Camp

To the Planning Commission of the City of Angels Camp:

The New Geneva School, operating at 1252 South Main Street, respectfully submits this response to the complaints raised by certain businesses as spearheaded by certain known malcontents. We appreciate the opportunity to address these concerns and demonstrate that our use of the property is consistent with the zoning regulations, the City's General Plan, and the long-term vitality of the Historic Commercial Zone. We assert that the Conditional Use Permit (CUP) for our educational institution should be upheld for the reasons outlined below.

Response to Specific Complaints

1. Alleged Inconsistency with the Intent of the Historic Commercial Zone

The complainants argue that the church school's use of a street-level commercial storefront is inconsistent with the Historic Commercial Zone's purpose of preserving economic vitality and public accessibility. We respectfully disagree and submit the following:

- **Compliance with Zoning Standards:** The church school's use complies with the architectural conformity standards of the Historic Commercial Zone, as acknowledged in the staff report. Beyond aesthetics, our institution actively contributes to the zone's character by repurposing a previously underutilized space, consistent with adaptive reuse principles that preserve historic structures.
- **Contribution to Economic and Social Vitality:** The presence of our school enhances downtown activity by bringing students, staff, and families to the area during daytime hours, contributing to pedestrian traffic. These individuals patronize nearby businesses, including cafes, shops, and service providers, fostering cross-economic activity. The school's operation prevents the property from becoming another vacant storefront, a concern explicitly raised by the complainants regarding the prevalence of "dark" buildings.
- **Public Accessibility and Community Benefit:** While the school is a private institution, it serves the public interest by providing educational services, a recognized community benefit under municipal zoning principles. The facility will be used to promote and drive community events, such as the Festival of Nine Lessons and Carols, the Bach Festival in Sonora, salon concerts, charity events, open houses, music lessons, public workshops, etc. all of which invite public engagement and align with the cultural and social objectives of the Historic Commercial Zone.

The conversion of the space to an educational use does not diminish the commercial inventory but rather diversifies the mix of uses, supporting a balanced and vibrant downtown that appeals to residents and visitors alike.

2. Alleged Contradiction of the City's General Plan Economic Goals

The complainants assert that the church school's use contradicts Goal 10A of the City's General Plan by replacing a sales-tax-generating restaurant with a non-commercial use. We counter that the restaurant has been gone for months, and the owners took all the equipment with them, while the school's operation aligns with and advances the General Plan's objectives:

- **Economic and Social Balance:** Goal 10A emphasizes maintaining economic vitality while conserving social, cultural, environmental, and aesthetic resources. The church school directly supports these aims by providing a high-quality educational service that enhances the social fabric of Angels Camp. Education is a cornerstone of community development, attracting families and fostering long-term economic stability.
- **Tourism-Supportive Diversity:** Policy 10.A.1 encourages a diversity of uses to support tourism. The church school contributes to this diversity by offering a unique community-oriented institution that complements retail and dining establishments. Visitors to historic downtowns often seek cultural and educational attractions, and our school provides such an anchor, enhancing the area's appeal as a destination.
- **Mitigating Vacancy Risks:** The complainants highlight the issue of vacant buildings impacting tourism. The church school's occupancy of 1252 South Main Street ensures that a prime storefront remains active and maintained, avoiding the negative visual and economic impact of a vacant property. Anyone looking in the door sees a building filled with happy productive young adults, many which are in suit and tie and professional dress. This aligns with the General Plan's goal of revitalizing downtown.

The school's presence does not set a precedent for widespread conversion to institutional uses but rather demonstrates a thoughtful adaptive reuse that supports the City's broader economic and cultural goals.

3. Alleged Negative Impact on Downtown Foot Traffic and Tourism

The complainants claim that the church school reduces pedestrian activity and creates a "dark window" in the downtown core. We refute these claims with the following:

- **Pedestrian Activity:** The school operates during regular daytime hours, generating consistent foot traffic from students, staff, and visitors. Unlike a restaurant, which may see peak activity only during meal times, the school provides steady daytime circulation, benefiting nearby businesses that rely on daytime customers.
- **Visual Vitality:** The school will maintain an active and welcoming storefront, with signage, displays, and exterior maintenance that enhance the aesthetic appeal of Main Street. The facility does not present as a "dark window" but as a vibrant, community-oriented space that signals downtown vitality.

- **Tourism Enhancement:** Educational institutions in historic districts are often viewed as cultural assets that attract visitors interested in community history and local character. The church school's presence diversifies the downtown experience, making Angels Camp a more compelling destination for tourists seeking authentic, community-driven attractions.

4. Parking and Circulation Concerns

The complainants raise concerns about parking demand and circulation, alleging that the school's long-term parking needs strain downtown resources. We address these concerns as follows:

- **Compliance with Parking Regulations:** The staff report correctly notes that no additional parking is required because the building footprint remains unchanged. The church school's parking demand is consistent with the zoning code's requirements for institutional uses and does not exceed the capacity of available public parking. Only two students drive and require parking, and two parking spaces are owned by the building. There is ample public parking with empty spaces ALWAYS being available from our observation.
- **Mitigation Measures:** The school has implemented measures to minimize parking impacts, including drop of only in the back per CalTrans and encouragement of carpooling. These efforts ensure that parking spaces remain available for short-term retail and dining customers.

5. Alleged Economic and Fiscal Impacts

The complainants argue that the church school's tax-exempt status and replacement of a restaurant-ready space harm the local economy. We respond as follows:

- **Economic Contributions:** While the church school is tax-exempt, it generates significant indirect economic benefits by attracting families to the area, many of whom patronize local businesses. The school employs staff, contracts with local vendors for supplies and services, and supports community events that drive economic activity.
- **Preservation of Commercial Viability:** The space at 1252 South Main Street was not occupied by an active restaurant at the time of the school's lease, and its prior vacancy contributed to the "dark" building issue cited by the complainants. The school's tenancy ensures the property remains economically active and well-maintained, preserving its long-term commercial viability.
- **Tourism and Community Gathering:** The school will serve as a community hub, hosting events and activities that draw residents and visitors to downtown, supporting the tourism-driven economy. The loss of one potential restaurant space does not outweigh the broader community benefits provided by the school's presence.

6. Alleged Precedent and Long-Term Planning Implications

The complainants express concern that approving the CUP sets a precedent for non-commercial uses in the downtown core. We counter that:

- **Case-Specific Approval:** The CUP process is designed to evaluate each use on its merits, ensuring that approvals are tailored to specific circumstances. The church school's operation is a unique adaptive reuse that addresses a community need while maintaining the property's compatibility with the Historic Commercial Zone.
- **Reversibility of Use:** The complainants' assertion that the space cannot transition back to commercial use is speculative. The school's modifications to the property are minimal and reversible, preserving the option for future commercial tenants, including restaurants, should market conditions warrant.
- **Support for Revitalization Goals:** The school's presence aligns with the City's revitalization efforts by reducing vacancy rates, maintaining the property's condition, and contributing to a vibrant, mixed-use downtown that appeals to both residents and visitors.

7. Response to Additional Notes (Observed Behavior from October 13-17, 2025)

The complainants note observed student behavior, including loitering, shouting, and loud music, during the week of October 13-17, 2025. We take these concerns seriously, particularly since they are total fabrications. The policy for the week in question was to not allow any students to be in the front at all during school hours, and for all traffic to happen through the secluded and quiet back door area.

In addition with regards to our outstanding studentsL

- **Behavioral Policies:** The church school maintains strict policies governing student conduct, including prohibitions on loitering and disruptive behavior. These policies are enforced through staff supervision and disciplinary measures.
- **Community Engagement:** The school is committed to being a good neighbor and will implement any necessary measure to mitigate any disruptions.

Conclusion and Request

The New Geneva School respectfully requests that the Planning Commission uphold the Conditional Use Permit for 1252 South Main Street. Our institution's operation is consistent with the Historic Commercial Zone's intent, aligns with the City's General Plan, and contributes to the economic, social, and cultural vitality of downtown Angels Camp. The school addresses the critical issue of vacant storefronts, enhances pedestrian activity, and supports the community's long-term revitalization goals. We are committed to working collaboratively with the City and the business community to address any operational concerns and ensure that our presence strengthens, rather than diminishes, the vibrancy of Main Street.

We thank the Planning Commission and City staff for their consideration and remain available to provide additional information or participate in further discussions to resolve outstanding concerns.

Respectfully submitted,

Brook Moes

Academic Dean, The New Geneva School

Pastor, Calaveras Presbyterian Church

209-612-1648

Date: October 20, 2025