



June 24, 2026

Rob Moore
Mayor, Town of Los Gatos
110 E Main St
Los Gatos, CA 95030

Re: Support of West Valley Muslim Association Appeal

Dear Mayor Moore,

As you know, JCRC Bay Area is the largest collective voice of Bay Area Jews, representing over 70 Jewish organizations across the region. We seek to build a Bay Area where the Jewish community and our neighbors can thrive, and this includes protecting the religious liberties of all residents.

We are writing in support of the West Valley Muslim Association (WVMA) and its appeal of the Planning Commission's decision regarding its Conditional Use Permit.

Throughout our history, American Jews have relied on constitutional and federal protections to ensure that we can gather, worship, and practice our faith free from unnecessary burdens. Because of this experience, we understand both the importance of religious liberty and the responsibility of religious institutions to work constructively with local governments and their neighbors.

Regarding WVMA's appeal, we recognize Los Gatos' responsibility to address legitimate public concerns. At the same time, we urge the Council to carefully review whether any of the proposed conditions place a substantial burden on WVMA's religious exercise and whether those conditions can be revised in a manner that addresses the Town's interests while preserving the Muslim community's ability to fully practice its faith.

Los Gatos is strengthened by its commitment to religious pluralism and equal treatment for all residents. We urge the Council to uphold these values and ensure that WVMA receives the fair consideration and protections guaranteed under federal law.

Thank you for your consideration. Please feel free to reach out if we can be of assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "J Blitchok".

Jessica Blitchok
Director of External Affairs
JCRC Bay Area

121 Steuart Street, Ste. 301, San Francisco, CA 94105
(415) 957-1551 • info@jcrc.org • www.jcrc.org



cc Vice Mayor Ristow
 Councilmember Badame
 Councilmember Rennie
 Councilmember Hudes

From: Lynley Kerr Hogan <[REDACTED]>

Sent: Monday, June 8, 2026 6:08 PM

To: Clerk <Clerk@losgatosca.gov>

Cc: Rob Moore <RMoore@losgatosca.gov>; Maria Ristow <MRistow@losgatosca.gov>; Mary Badame <MBadame@losgatosca.gov>; Rob Rennie <RRennie@losgatosca.gov>; Matthew Hudes <MHudes@losgatosca.gov>; Alexa Nolder <ANolder@losgatosca.gov>; Planning <Planning@losgatosca.gov>

Subject: Public Comment in Opposition to WVMA Appeal of Planning Commission CUP Conditions – 16769 Farley Road (U-24-010)

Dear Town Clerk and Honorable Members of the Los Gatos Town Council and Planning Commission,

I am writing as a life-long resident of Los Gatos to submit public comment in strong support of the Los Gatos Planning Commission's May 21, 2026 approval of Conditional Use Permit modification U-24-010 for the West Valley Muslim Association (WVMA) facility at 16769 Farley Road—and in opposition to WVMA's appeal of 19 of the 33 conditions of approval.

The Farley Road neighborhood is zoned R-1:8 for low-density residential use. The existing CUP (originally issued for a prior religious use and modified in 2020) appropriately limited hours of operation to protect the quiet enjoyment of neighboring homes. WVMA's request to extend hours—allowing indoor prayers as early as 1.5 hours before sunrise and until 10:30 p.m. (or later during Ramadan)—would intensify activity in a quiet residential cul-de-sac. Neighbors have documented ongoing impacts including:

1. Increased late-night and early-morning traffic congestion and parking overflow onto residential streets
2. Noise from car doors slamming, engines, voices, and headlights shining into bedrooms
3. Safety concerns for pedestrians, children, and emergency access on narrow, unlit streets without adequate sidewalks or traffic calming

These are not hypothetical or religiously motivated concerns. They are measurable land-use impacts that any high-traffic use (religious or secular) would create in this zoning district. The Planning Commission heard extensive public testimony, reviewed traffic and noise studies, and imposed reasonable, evidence-based conditions—including occupancy limits, parking improvements, landscaping/screening, compliance reviews, and operational restrictions—to mitigate these impacts while still allowing the facility to function as a place of worship.

mercurynews.com

WVMA's appeal claims that these 19 conditions (including annual reviews, attendance caps, use restrictions, and capital improvements) violate RLUIPA and constitute discriminatory overreach. This characterization is not supported by the record. The conditions are content-neutral, generally applicable to any institutional use in a residential zone, and directly tied to documented public safety, noise, and traffic data presented at multiple public hearings. They do not dictate "what worship means" but simply require the same level of compatibility with the

surrounding neighborhood that has been required of every other CUP-approved use in Los Gatos.

Religious freedom is a cornerstone of our community, but it does not exempt any institution—mosque, church, synagogue, or secular venue—from neutral regulations that protect public welfare and residential quality of life. RLUIPA requires that any substantial burden on religious exercise serve a compelling governmental interest through the least restrictive means. Neighborhood tranquility, traffic safety, and compliance with zoning are long-recognized compelling interests, and the Commission's conditions meet that standard.

I respectfully urge the Town Council to deny WVMA's appeal of the 19 challenged conditions (or uphold the full set of 33 conditions) and affirm the Planning Commission's decision. This will ensure that the Farley Road neighborhood remains a safe, livable residential community while allowing WVMA to continue its operations within reasonable, enforceable limits.

Thank you for your time and service to the Town of Los Gatos. I am available for any questions and request that this letter be included in the public record for the appeal.

Sincerely,

Lynley Kerr Hogan
Resident Since 1967

Sent with [Proton Mail](#) secure email.

From: Hongzhi Zhao <[REDACTED]>

Sent: Thursday, May 21, 2026 3:11 PM

To: Planning <Planning@losgatosca.gov>; Jocelyn Shoopman <jshoopman@losgatosca.gov>

Subject: WVMA Conditional Use Permit Application U-24-010, Farley Road Safety for pedestrians

Dear Los Gatos City Planning Commission Member:

I am writing to express my deep concern regarding traffic safety issues on Farley Road. Given that the draft of the revised WVMA Conditional Use Permit (CUP) allows for a substantial increase in traffic volume, I fear this will pose a grave threat to pedestrian safety within our community.

Farley Road measures approximately 36 feet in width—a dimension calculated based on the property lines on either side of the roadway. Farley Road is a two-way thoroughfare shared by pedestrians and children riding bicycles.

Currently, this stretch of road is not equipped with streetlights. Given that the standard safe width for a single vehicular lane is 11 feet, a two-way, two-lane configuration would require a total road width of 22 feet. Furthermore, a motor vehicle (including side mirrors) measures approximately 8 feet in width;

Consequently, if vehicles are parked on both sides of Farley Road, the total required road width increases to 38 feet. However, the actual width of Farley Road is merely 36 feet. This width is already insufficient to accommodate the increasingly heavy traffic volume.

As a result, pedestrians on Farley Road are left with absolutely nowhere to walk. This situation places the lives and safety of our community residents in extreme jeopardy. It not only deprives community pedestrians and cyclists of their right to safe passage but also forces the residents of the Farley Road community to live in constant fear—perpetually anxious about their personal safety and facing the fatal risk of being struck and killed by a vehicle at any moment.

Regards,
Hongzhi Zhao

[REDACTED]

From: Farley Road Neighborhood Coalition <[REDACTED]>

Sent: Thursday, May 21, 2026 12:06 PM

To: Alexa Nolder <ANolder@losgatosca.gov>; Chris Constantin <CConstantin@losgatosca.gov>; Gabrielle Whelan <GWhelan@losgatosca.gov>

Cc: Allen Meyer <AMeyer@losgatosca.gov>; Sean Mullin <SMullin@losgatosca.gov>; Joel Paulson <jpaulson@losgatosca.gov>; Town Manager <Manager@losgatosca.gov>

Subject: Request to Delay Adoption of Resolution: CUP Conditions for 16769 Farley Road

May 20, 2026

Dear Planning Commission:

We are writing to provide more relevant context to address concerns with and offer ideas on how to improve the current draft of the "CONDITIONS OF APPROVAL" published online for the May 21 Special Session for the Planning Commission Meeting. The CONDITIONS OF APPROVAL have evolved from the Applicant's initial modification application of the CUP for 16769 Farley into, today, a list with complexities and confusion surrounding the issues and a lack of clear language and terms to correctly set 1) accountability 2) clarity 3) create alignment and 4) strive towards compatibility = harmony.

The current drafted conditions ignore the legitimate governmental interest of neighborhood preservation, penalizing local residents. The Town is treating WVMA significantly better than other secular and religious institutions.

We need to be fastidious with the language to eliminate misalignment and provide compliance guardrails. We want to ensure that the Planning Commission, Commissioners and Town Council are all equally equipped with data that represent the residents' and neighborhood's best interest, as well as the Applicant. Today the data is a lopsided, unrealistic representation of the situation.

As it stands with the current drafted conditions, the residents are being punished and the legitimate governmental interest of preserving the neighborhood blatantly ignored. The Town is treating WVMA better than other Islamic institutions in the Bay Area (especially as a majority of other area mosques are located in industrial zones, but are still required to have daily traffic caps). Most certainly better than Hillbrook School CUP, for which an intensification of use and traffic limit precedent was set more than 15 years ago.

Per the recommendation of the Town of Los Gatos, we are respectfully submitting this document summarizing concerns the neighbors have contained within the list of CONDITIONS OF APPROVAL, posted on the Town of Los Gatos' Planning Commission Meeting Packet for the 5/21/20 meeting. We are also including existing examples of precedence and where conditions are incomparable. We believe that providing this holistic picture gives the Planning Commission staff, the Commissioners and the Town Council a realistic, fact based, informed

recommendation to address and balance the pending modification CUP application for 16769 Farley Road:

1. USE AND OCCUPANCY

Recommended ACTION: Delay Adoption of Resolution - The original intent of the CUP modification application was to address hours to support a. five daily prayer hours (including clarification of 'predawn services') and b. adopt seasonal late hours to support the lunar calendar. Today, it would not be prudent or responsible for the Planning Commissioners or Town Council to adopt any resolution without fact based relevant data that is representative of the modifications being requested.

Why: The current information before the Planning Commission Staff and Commissioners is inaccurate. The current information submitted by the Applicant is misleading and irrelevant as the data does not provide factual or accurate information about the intensification of use conditions (traffic, safety, light and noise pollution). The data submitted is NOT representative of the proposed modification scenarios (General Hours or Ramadan) as the Applicant's reports were done in 'non-seasonal' conditions, as well as only for daily prayer service, versus the extensive types of permitted use (**Section B, Item #9 - Use and occupancy**). Misapplying RLUIPA strips homeowners of their property rights, turning residents into "second-class citizens". Enforcing neutral restrictions on noise, headlights, and hours of operation is a legitimate exercise of municipal authority, not religious discrimination.

The Facts:

- Established
- [Ninth](#)
- [Circuit precedent, such as San](#)
- [Jose Christian College v. City of Morgan Hill](#) (2004),
- which allows municipalities much greater oversight.
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- Regional Mosque Precedent: Most Bay Area mosques are located in
- industrial zones and operate under strict daily traffic caps. For example, as part of its CUP, MCA in Santa Clara must enforce an approved Parking Management Plan. This requires securing overflow agreements with neighboring commercial properties (e.g., ServiceNow,
- Vanguard) during high-attendance events like Friday prayers or Ramadan to prevent neighborhood congestion.
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- Federal courts consistently uphold reasonable, neutral compromises

- that balance neighborhood impact with worship needs.
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- Local Precedent: The Hillbrook School CUP established a clear precedent for limiting traffic and intensification of use more than 15 years ago.
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- Los Gatos has consistently imposed conditions regulating congregations size, parking capacity, traffic management, operational hours and advance notification requirements where necessary to mitigate neighborhood impacts and protect public safety (See Mary Hogan's letter from May 12)
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- *Rolling Hills Covenant Church,*
- municipal-led compromises successfully scaled back sanctuary capacity and adjusted operations to preserve infrastructure. Neutral limits on operational hours and traffic flows protect public safety; they do not restrict the ability to practice faith.
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- The "Equal Terms" Mandate Prohibits Special Privileges: RLUIPA
- forbids treating religious institutions worse than secular ones, but it also prohibits treating them better by granting unsafe infrastructure exemptions.
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- CUP Precedents set with Hillbrook School
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Proposed Remedy: Town to contract with a neutral 3rd party, studies capturing and reporting the intensification of traffic, safety, noise and light for the two plus scenarios the Applicant is proposing during 1) Ramadan 2027; and a 2) comprehensive 60 day analysis of general hours for a. Prayer service hours and b. Activity Hours; 3) Events (Require 4 separate events to be assessed).

CONCLUSION: Upon completion, analysis and 3rd party presentation of the studies' results, The Town to revise and reevaluate the Use and Occupancy, Facility Operations, Noise, Parking & Traffic and Facilities and Site Design at a date certain of no more than 90 days after 2027 Ramadan, Seasonal Late-Hours Exception.

In the case a denial is not possible, please consider the following permit parking condition as discussed with Gabrielle Whelan and the additional context to improve/bolster the draft conditions:

Permit Parking **Recommended ACTION: Add a new item to the CONDITIONS:** Town of Los Gatos Planning Staff and Town Engineering- **to develop and fund a Residential Parking Permit Program** for FRNC. (See details below.) This is a critical need to ensure public safety and satisfy the legitimate governmental interest in preserving our neighborhood. It is not a RLUIPA violation because the applicant would receive parking permits as well as neighbors.

B. Use and Occupancy

Permitted USE (Item 9): Include language that requires EVENTS to have a cap, Requires Notice of X days; # of Events per year or Month to be capped; Requires a permit be obtained for Event and with LGPD. Faith Lutheran has this condition so it's not a RLUIPA violation.

Permitted USE (Item 11): Occupancy limits must be CLEAR in order for the Applicant to have clear understanding to manage and be in compliance. Per Town Codes Sec. 29.10.150. Number of off-street spaces required. And Sec. 29.10.155. - Development standards. Additional language needed to describe how this condition will be enforced. Fire and Building Code to address standing/prostrating when assessing occupancy limits.

2.

3.

4. **FACILITY OPERATIONS (Section C)**

5.

General Hours (Item 12)

To adhere to Town Code Sec. 16.20.010. Curfew noise disturbance.

Clear language stating all general activities (outside worship and Ramadan seasonal hours) are limited to 8 am - 10 pm similar to other R-1 religious institutions including [St. Mary's](#) which operates only until 9:30 annually.

Seasonal Late-Hours Exception (Item 13) Consistency with Item 12 - maximum of 720 persons. Unless a TDM plan is required and WVMA provides leases with nearby parking lots and drop-off and pick-up on Farley Road is prohibited.

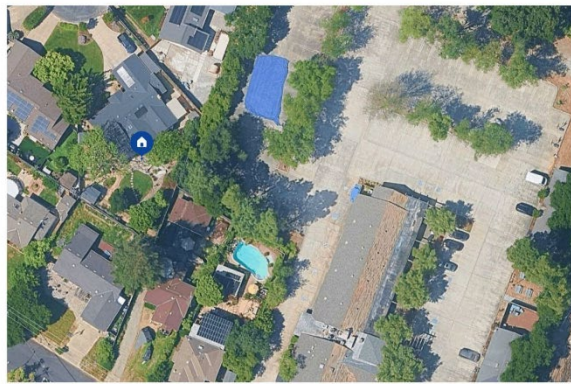
Lot Closure Rule (Item 15) - Clarify language so it correlates with Item 12. Allow applicant 15 minutes to vacate the parking lot after worship services outside general hours of operation — not 30 minutes.

Food Vendors (Item 18) - As a required CONDITION that the following language be added to this item:

Applicant's request for CUP modification, include vendors, must implement a restricted space requiring vendors only use the East Side of the parking lot, and may not be located on any perimeter property line or residential fence line on the West side of the parking lot, specifically: properties located at 16761, 16771 and 16781 Corcel Court; and 16803 and 16793 Farley Road (see Image A).

Why: Mutual Benefit will help mitigate noise pollution along residential and facility property lines, protecting and respecting the neighborhood's full-time residents' privacy by providing a dependable, consistent and reliable method to help foster a healthy, safe and supportive neighborhood character and harmonious environment.

When: Use limits: Must comply with Item #12, b - General Hours.



Share



- 3.
- 4.
5. **Parking and Traffic (Section E)**
- 6.

Item 23: Parking Lot Monitoring Recommended Action:

This condition as it stands only addresses traffic direction in the parking lot. To ensure public safety and comply with Town Code Chapter 15 Motor Vehicles & Traffic, require that traffic directors, directing traffic on Farley Road from LG Blvd to Izorah Way during Ramadan, are trained individuals.

Item 24: Driveway Operations Recommended Actions:

Require Applicant to remove Right Turn Only Sign and install Left Turn Only Sign by September 1, 2026 to protect public safety, including children biking home on Fridays on Safe Routes to School, and feed vehicles directly to Los Gatos Blvd and not through feeder streets. Note: Speeding was reported on Frank Avenue as recently as May 2026 after Friday services. The current language gives the applicant only permission to remove the sign. The applicant has had such permission for two years but not taken action.

Traffic monitors required at ingress/egress and to monitor on-street parking during Friday prayers to ensure public safety, ensure that neighboring driveways are preserved and that the lot is completely full before street parking is taken.

Events Parking Overflow Plan - Require more details and specific language. There are no details currently on how this will work or deadlines.

Permit Parking **Recommended ACTION: Add a new item to the CONDITIONS:** Town of Los Gatos Planning Staff and Town Engineering- **to develop and fund a Residential Parking Permit Program** for FRNC that can be rolled out in phases, with the first phase implemented by September 2026, to include Farley Road between Los Gatos Blvd and Flintridge, including Izorah Way and Frank Avenue. The recommendation of FRNC is to utilize the same plan the Town of Los Gatos has on Tait Avenue and Bean for St. Mary's Catholic Church (see Image B).

The first phase will be monitored and included in the first Compliance Review. Based on this, the future phases, timing, components and expansion will be proposed and reviewed, with the intent to leverage the Town of Los Gatos' new parking permit program currently under development.



Image B

Sincerely,
The Farley Road Neighborhood Coalition