

ATTACHMENT 2
NO EFFECT DETERMINATION BY DEPARTMENT OF FISH AND GAME

CEQA Filing Fee No Effect Determination Form

Applicant Name: City of Pasadena, Planning & Development Department

Date Submitted: August 8, 2007

Applicant Address: 175 N. Garfield Avenue, Pasadena California

Project Name: Zoning Code Amendments – Massage Establishments

CEQA Lead Agency: City of Pasadena, Planning & Development Department

CEQA Document Type: Negative Declaration

SCH Number and/or local agency ID number: Not Applicable

Project Location: City of Pasadena, City-wide in applicable zoning districts

Brief Project Description: The proposed Code Amendments will establish a new land use category, requirements, exemptions, and definition associated with “Massage Establishments” to the Pasadena Municipal Code Title 17, “Zoning Code”. The Zoning Code amendment will eliminate “massage services” from the definition of the Personal Services, Restricted land use. Establish a new land use category of “Massage Establishments”. Impose a 250-foot distance separation requirement in order to regulate secondary impacts of massage uses on residentially zoned properties (outside the Central District Specific Plan). The new Massage Establishments land use will be subject to the review and approval of a Conditional Use Permit. The ordinance will also amend the Home Occupation standards associated with massage services of the Zoning Code. No new development is proposed, rather revisions and code amendments only.

Determination: Based on a review of the Project as proposed, the Department of Fish and Game has determined that for purposes of the assessment of CEQA filing fees [F&G Code 711.4(c)] the project has no potential effect on fish, wildlife and habitat and the project as described does not require payment of a CEQA filing fee. This determination does not in any way imply that the project is exempt from CEQA and does not determine the significance of any potential project effects evaluated pursuant to CEQA.

Please retain this original determination for your records; you are required to file a copy of this determination with the County Clerk after your project is approved and at the time of filing of the CEQA lead agency’s Notice of Determination (NOD). If you do not file a copy of this determination with the County Clerk at the time of filing of the NOD, the appropriate CEQA filing fee will be due and payable.

Without a valid No Effect Determination Form or proof of fee payment, the project will not be operative, vested, or final and any local permits issued for the project will be invalid, pursuant to Fish and Game Code Section 711.4(c)(3).

DFG Approval By: Leslee Newton-Reed (signature on file)
Title: Environmental Scientist

Date: 09-04-07

ATTACHMENT 3
CONDITION OF APPROVAL – TITLE 5 AMENDMENT REFERENCE

1. The hours of operation shall be limited to 10:00 AM to 10:00 PM, Monday through Sunday.
2. No 'blackout' tint or blinds on the windows that can prevent someone on the outside from seeing inside the premises are permitted.
3. Each massage technician shall be processed through the Police Department as a massage technician and must be in possession of a valid Pasadena business license. Interns shall not be allowed.
4. No false or misleading advertising shall be permitted.
5. Massage technicians are to be fully clothed. No lingerie, bikinis, or similar clothing considered inappropriate for massages shall be permitted.
6. No condoms or adult-only videos or publications are to be permitted on the premises.
7. Disinfecting agents and sterilizing equipment shall be provided for any instruments used in performing acts of massage and said instruments shall be disinfected and sterilized after each use.
8. All lavatories or wash basins shall be provided with hot and cold running water, soap, and single-service towels in wall-mounted dispensers.
9. Pads used on massage tables shall be covered with durable, washable plastic or other acceptable waterproof material.
10. Minimum lighting shall be provided in accordance with Article 220 of the National Electric Code and in addition at least one artificial light of not less than forty watts shall be provided in each room or enclosure where massage services are performed on patrons.
11. Each person employed or acting as a massage technician shall have a valid permit issued by the City. It shall be unlawful for the owner, operator, responsible managing employee, manager, or permittee in charge of, or in control of, the establishment to employ or permit a person to act as a massage technician as defined in this code who is not in possession of a valid massage technician's permit.
12. A list of services available and the costs of such services shall be posted in an open, public place on the premises and shall be described in readily understandable language. All letters and numbers shall be capitals not less than one-half inch in height. No owner, operator, responsible managing employee, manager, or permittee shall permit and no massage technician shall offer to perform services other than those posted, nor charge a price in excess of that posted for the provision of any service.
13. The massage establishment shall provide clean and sanitary towels, sheets, and linens in sufficient quantity. Towels, sheets, and linens shall not be used by more than one person at a time. Reuse of such linen is prohibited unless the linen has first been laundered. Heavy

white paper may be substituted for sheets provided that such paper is used only once for each person and then discarded in a sanitary receptacle.

14. No person shall enter, be or remain in any part of the massage establishment while in possession of, consuming, or using any alcoholic beverage or drugs except pursuant to a prescription for such drugs. The owner, operator, responsible managing employee, manager, or permittee shall not permit any such person to enter or remain upon such premises.
15. The massage establishment shall not operate a school of massage, nor use the same facilities as that of a school of massage. It shall be unlawful for any person to perform any massage upon a member of the general public while on the premises of a school of massage. Instructors and students of such schools may practice massage only upon a bona fide employee of the school or a student. A dummy may be used.
16. No owner, operator, responsible managing employee, manager or permittee in charge of or in control of a massage establishment shall, during the course of any service or task associated with any element of a massage operation, permit any person to massage or touch the genitals of another person.
17. Due to the requirement and need for accountability in the provision of massage, it shall be unlawful for any massage establishment to permit a massage technician to provide massage within the establishment unless that massage technician is an employee directly accountable to the holder of the massage establishment license.
18. There shall be an owner, operator, managing employee, or manager (hereinafter called "managerial personnel") on the premises at all times when the establishment is open for business. All managerial personnel shall wear plainly visible badges identifying them as managerial personnel.

ATTACHMENT 4
PROPOSED ZONING CODE AMENDMENTS

Proposed Definitions:

Day/Health Spa. Any premises, place of business or membership club providing facilities devoted especially to health, beauty, and relaxation which deal with the cosmetic, therapeutic, and/or holistic treatments for women and men, where people visit for professionally administered personal care treatments, and where less than 20 percent of the establishment (gross floor area) is designated (permanently or temporarily) as massage/treatment rooms (partially or fully enclosed). Medical Spa shall be classified as a Medical Office land use.

Massage. The treatment of the human body by soft tissue manipulation using a variety of manipulative techniques, which may include any method of pressure on, friction against, rubbing, kneading, tapping, stroking, pounding, vibrating, or simulating the external part of the human body with the hands or with the aid of any electrical or mechanical apparatus, or other appliances or devices, with or without such supplementary aids as rubbing alcohol, liniment, oil, powder, antiseptic, cream, lotion, ointment, or other similar preparations. This may include body, mind, spirit integration, personal growth, physical or emotional relaxation and the relief of somatic pain or dysfunction. Massage includes acupuncture, bodywork, somatic therapies, and holistic health services not professionally licensed by the State of California.

Massage Establishments (land use). Any premises, place of business or membership club where there is conducted business or activity of furnishing, providing or giving for a fee or other form of consideration of a massage, fomentation, bath, manipulation of the body, electric or magnetic treatment, alcohol rub or other similar massage service or procedure where 20 percent or more of the establishment (gross floor area) is designated (permanently or temporarily) as massage/treatment rooms (partially or fully enclosed).

Massage technician. Any person male or female, who, in connection with the activities of a massage establishment, administers to another person a massage, alcoholic rub, fomentation, bath, electric or magnetic massage procedure, manipulation of the body or other similar procedure. All massage technicians operating in the City shall be licensed by the State of California and shall practice and engage in said licensed profession. A Massage Technician license is required from the Business License Department, which requires background clearance from the Police Department.

Recognized school of Massage. Any school or institution which requires courses on theory, history, ethics, practice, methods, profession and work of massage, including the study of anatomy and physiology and hygiene, and demonstration and practice of massage techniques, and which provides a diploma or certificate of graduation upon successful completion of such course of study or course work recognized and approved by the State of California, Department of Consumer Affairs, Bureau for Private

Postsecondary and Vocational Education shall be deemed as a “School – Specialized education and training” land use. Any school or institution of learning offering or allowing correspondence course credit not requiring actual attendance at class, or a course of massage not recognized and approved by the State of California, Department of Consumer Affairs, Bureau for Private Postsecondary and Vocational Education shall not be deemed a “Recognized school of Massage” and shall be deemed as a “Massage Establishments” and shall be subject to applicable development standards and to a Conditional Use Permit.

A. **Exemptions.** The following professions and services are exempt from the “Massage Establishments” land use classification:

1. Any duly licensed medical physician, doctors, surgeon, osteopath, chiropractor, acupuncturist, registered nurse, or to other persons licensed by the state while engaging in practices as part their license.
2. Any barber, beautician, manicurist, cosmetologist, and esthetician who are licensed under the laws of the State of California while engaging in practices as part their license. This exemption shall include hospitals, nursing homes, sanitariums, or any other health facility duly licensed by the State of California or to accredited high schools, junior colleges, colleges, or universities whose coaches and trainers are acting within the scope of their employment.
3. Shall not apply to physical therapist and trainers of amateur, semiprofessional, or professional athletes or athletic teams while engaging in their training responsibilities for and with athletes.
4. Any massage technicians offering massage services to a fully clothed client in public common unenclosed areas where the primary use is not a Massage Establishment (i.e., chair massage services in a supermarket, massage services in the courtyard of an outdoor or indoor shopping center). These massage technicians are exempt from being classified as a Massage Establishment but they are still required to obtain a background check and clearance approval from the Police Department under Title 5.

ATTACHMENT 5
MESSAGE ESTABLISHMENT/DAY SPA FLOOR AREA ANALYSIS

The Pasadena Zoning Code requires a 500-foot separation between uses classified as “Personal Services—Restricted” (17.50.200). At present, this land use category includes all licensed massage uses. Consequently, many spas and salons that offer massage services as part or all of their overall businesses and wish to operate in Pasadena are limited as to where they can locate in the City.

The definition of Personal Services, Restricted, as detailed in the Zoning Code reads as follows:

Personal Services, Restricted (land use). A personal service establishment that may tend to have a blighting and/or deteriorating effect upon surrounding areas and that may need to be dispersed from other similar uses to minimize its adverse impacts, including:

- check-cashing services
- **massage services or parlors**
- tattooing, piercing, and similar services

These uses may also include accessory retail sales of products related to the services provided.

WHAT MESSAGE BUSINESSES ARE HERE NOW?

In an effort to identify ways to differentiate between massage parlors that might have “blighting and/or deteriorating” effects on surrounding areas and spa or medical uses that primarily or secondarily offer massage services, staff conducted a preliminary analysis of the City’s existing massage businesses.

Using the City’s database of current business licenses, the following operating businesses were identified as providers of massage services (by name only):

Focusing on the 9 top spas in the City, staff contacted representatives of each business to find out how they were utilizing their space and, most importantly, how much of their building space was devoted to massage services. Those results are detailed in the chart below.

Business Name	Address	Bldg Sq. Ft.	Massage Rooms Sq. Ft.	Total # of Massage Rooms	# of Enclosed Rooms	% of Enclosed Rooms devoted to massage	% of Total SF Devoted to Massage	Massage Rooms per 1,000 Sq. Ft.	Services Provided	Primary Zoning	Land Use
Acu Spa	350 S. Lake Ave, Ste 220								Massage, Traditional Chinese Medicine, Facials, Waxing	CD5	Commercial/Retail, General
Amadeus Spa	260 East Colorado Blvd, Ste. 210	6,200	120	7	7	100%	14%	1.13	Massage, Facials, Laser Hair Removal, Body Wraps, Nails, Esthetician	CD2	Shopping Center/ Department Store
Amadeus Spa	799 East Green Street	10,500	120	9	9	100%	10%	0.86	Massage, Facials, Laser Hair Removal, Body Wraps, Nails, Esthetician	CD4	Office/ Professional Building
Burke Williams Day Spa & Massage Ctr.	39 Mills Place	12,836	96	17	26	65%	13%	1.32	Massage, Skin Care, Body Wraps, Nails, Hair Salon	CD1	Recreational, General
Cote D'Azur Spa	37 N. Arroyo Pkwy	2,800	144	4	4	100%	21%	1.43	Massage, Facials, Body Wraps	CD1	Office/ Professional Building

Ritz-Carlton Huntington, Hotel & Spa	1401 S. Oak Knoll Avenue	11,590	108	9	17	53%	8%	0.78	Massage, Facials, Hair, Nails, Fitness Center	PD15	Hotel/Motel
Serinity Day Spa	1043 E. Green St	1,702		5	5	100%		2.94	Massage, Facials	CD5	Commercial/ Retail, General
Shiatsu of California	157 E. Holly Street	8,437		4	4	100%		0.47	Massage, Retail	CD2	Commercial/Retail
Touche' the Salon & Day Spa	548 S. Lake Avenue	5,078		1	5	20%		0.20	Massage, Airbrush Tanning, Facials, Hair Salon, Permanent Makeup, Nails	CD5	Commercial/ Retail, General
The Massage Company	1260 E. Colorado Blvd		85	4	5	80%			Massage, Esthetician	ECSP- CG-1	Commercial/Retail, General

ATTACHMENT 6
DISTANCE SEPARATION ANALYSIS

City of Pasadena
Massage Establishment Analysis
July 16, 2007

Project Approach

The methodology for the Massage Establishment Analysis involved 3 phases. The first phase focused on identifying the existing massage establishments and property zone districts. The second phase measured the distance of existing massage establishment to the nearest Residential Zoning District from property line to property line. The final phase looked at the number of parcels that would be permitted, and the number of existing establishments that would be conforming and nonconforming if a distance requirement of 250 feet or 500 feet were established for Residential Zones. The Central District was not included in the analysis.

For Phase 1, the ArcGIS address locator was used to geocode and create Existing Massage Establishment dataset (this shows the establishments as points on a map). Geocoding is the process of assigning geographic identifiers (e.g., codes or geographic coordinates expressed as latitude-longitude) to map features and other data records, such as addresses. Using the parcel and tidemark datasets, this point dataset was used to assign parcels to the massage establishment points. The parcels identified were used in the analysis. Due to the small size of many of the parcels, a point is used to depict the establishments on the maps, but the parcel was used for the actual analysis.

Using several ArcGIS extension tools (ET GeoWizard Tools and COSTools) Phase 2 was completed by calculating the distance of each establishment (outside the CD zone) to the closest residentially-zoned property.

For Phase 3, the ArcGIS buffer tool was used to identify a distance of 250 and 500 feet from all residentially-zoned property in the City.

Distance Data for Massage Establishments

Based on the Phase 2 analysis, the following tables show the distance of each massage establishment to the closest residentially-zoned property. The distance was measured from property line to property line and excluded establishments in the Central District. In some cases there are multiple establishments in the City with the same name. There are a total of 65 establishments citywide, 30 of the establishments are located in the Central District. The analysis yielded the following distance statistics:

Table 1
Distance Statistics
(Excludes establishments in the Central District)

Measurement	Feet	Note
Minimum	0 feet	These establishments are

		either within or directly adjacent to a residential zone
Maximum	1217.3 feet	Business Name: Body Healing Center
Average	91.2 feet	

*Table 2
Massage Establishment Distance to Residentially-Zoned Property
(Excludes establishments in the Central District)*

	Establishment Name	Assessor Parcel Number	Distance to the closest residentially-zoned property
1	Ahhh Massage	5848-011-004	0
2	Elaina Luther	5734-015-024	0
3	Gene Martin Salon	5744-021-008	0
4	Lodestone Massage Office	5720-018-005	0
5	Luis Rene Zazueta	5727-007-019	0
6	Marcie	5720-034-017	0
7	N/A (Private Residence)	5725-031-017	0
8	Oriental Massage	5746-004-074	0
9	Shangri-La	5746-004-074	0
10	Altius Holistic Center	5757-023-010	0
11	Angela's Massage	5732-015-023	0
12	Baotu Spring Health Center	5748-001-053	216.84
13	Body Care Clinic	5738-015-035	63.56
14	Body Healing Center	5720-001-001	1217.27
15	Body Healing Center	5738-009-039	0
16	Body Healing Center	5747-013-030	49.04
17	Bravo Urban Salon	5731-019-070	158.96
18	Chirocenter	5740-015-024	0
19	Colbert Studios	5744-019-002	0
20	Colorado Spa	5746-007-081	0
21	Deanna Vela	5737-001-019	0
22	Energy Within Massage	5738-009-039	0
23	Essence Health Spa	5754-006-020	59.58
24	Fountain Of Youth Massage Therapy	5748-009-029	300.92
25	Green Tree Therapy L L C	5750-033-033	19.99
26	Huntington Spa And Salon	5325-011-019	73.25
27	Jiuan Acupuncture Health Center	5748-009-030	265.31
28	Jonique	5752-020-047	0
29	Phoebe Saxon	5754-006-020	59.58
30	Sunny Days	5738-015-035	63.56
31	Thai Sabai Massage & Salon	5737-004-016	0
32	The Massage Company	5735-001-030	291.19

Table 2
Massage Establishment Distance to Residentially-Zoned Property
(Excludes establishments in the Central District)

	Establishment Name	Assessor Parcel Number	Distance to the closest residentially-zoned property
33	Workoutmaster	5746-022-063	181.96
34	Z Med Spa Of Pasadena	5728-023-026	91.36
35	Zanshin Goshin Dojo	5758-018-011	79.78

Residential Distance Requirement

For Phase 3, the ArcGIS buffer tool was used to identify a distance of 250 and 500 feet from all residentially-zoned property in the City. The remaining parcels were then cross-checked with a list of primary zones that allow personal services-restricted business (Table 3). This analysis yielded the number of parcels available for location of a personal services-restricted use. The number of parcels yielded is a preliminary analysis and does not take into consideration any physical constraints that may preclude development of a site.

Table 3
Zoning for Personal Services - Restricted Uses

	Personal Services-Restricted Uses ALLOWED (with CUP)	Personal Services-Restricted Uses NOT ALLOWED
City wide Zones		
	CG	RS
	IG	RM
		CO
		CL
		OS
		PS, PS-1
Specific Plans		
Central District	CD-1, CD-4, CD-6	CD-2, CD-3, CD-5
East Colorado	CG-1, CG-2, CG-3, CG-4, CG-5, CG-6	CL-3
East Pasadena	d1-CG, d2-CG, d2-IG, d3-CG	d1-CO, d1-CL, d1-IG, d2-CO, d2-CL, d2-PS, d3-CO
Fair Oaks/Orange Grove	CL-1a, CL-1b, C-2, C-3a, C-3b, C-3c, C-3d	RM-12, RM-16, PS, OS
North Lake	NONE	ALL
South Fair Oaks	IG	Remaining Zones
West Gateway	NONE	ALL

250-foot Distance Requirement

Based on the Phase 3 analysis, imposing a 250-foot distance requirement would cause 31 of the 35 existing massage establishments (outside the Central District) to become non-conforming. The following number of parcels is available for a massage establishment or other personal services restricted businesses if a distance requirement is implemented.

- Number of Conforming Establishments (based on distance requirement): 4
- Number of Non-Conforming Establishments(based on distance requirement): 31
- Parcels Available Citywide with 250-foot Distance Requirement from Residentially-Zoned Property and Within a Conforming Zone: 896

*Table 4
Parcels Available Citywide with 250-foot
Distance Requirement from
Residentially-Zoned Property and Within
a Conforming Zone*

Zone	Number of Conforming Parcels
CD1	311
CD4	120
CD6	213
CG	26
CG1	3
ECSP-CG-1	23
ECSP-CG-2	6
ECSP-CG-5	16
ECSP-CG-6	27
EPSP-d1-CG	39
EPSP-d2-CG	2
EPSP-d2-CG- B	5
EPSP-d2-CG- B-1	2
EPSP-d2-CG- B-2	1
EPSP-d2-CG- B-3	1
EPSP-d2-CG- C	1
EPSP-d2-IG- A	8
EPSP-d2-IG- B-4	2

*Table 4
Parcels Available Citywide with 250-foot
Distance Requirement from
Residentially-Zoned Property and Within
a Conforming Zone*

Zone	Number of Conforming Parcels
EPSP-d3-CG- E	1
EPSP-d3-CG- E-1	3
EPSP-d3-CG- F	1
FGSP-C-3b	2
IG	83
Total	896

500-foot Distance Requirement

Based on the Phase 3 analysis, imposing a 500-foot distance requirement would cause 34 of the 35 existing massage establishments (outside the Central District) to become non-conforming. For existing massage establishments, imposing a distance requirement of 500 feet would cause 34 of the 35 establishments (outside the Central District) to become non-conforming.

- Number of Conforming Establishments (based on distance requirement): 1
- Number of Non-Conforming Establishments (based on distance requirement): 34
- Parcels Available Citywide with 500-foot Distance Requirement from Residentially-Zoned Property and Within a Conforming Zone: 653

*Table 5
Parcels Available Citywide with 500-foot
Distance Requirement from
Residentially-Zoned Property and Within
a Conforming Zone*

Zone	Number of Conforming Parcels
CD1	294
CD4	87
CD6	162
CG	3
ECSP-CG-6	19
EPSP-d1-CG	10

*Table 5
Parcels Available Citywide with 500-foot
Distance Requirement from
Residentially-Zoned Property and Within
a Conforming Zone*

Zone	Number of Conforming Parcels
EPSP-d2-CG	1
EPSP-d2-CG-B	5
EPSP-d2-CG-B-1	2
EPSP-d2-CG-B-2	1
EPSP-d2-IG-A	8
EPSP-d3-CG-E-1	1
IG	60
Total	653

Data Sources

The data used for the Massage Establishment Analysis came from the City of Pasadena. The primary data sources are described below.

GIS Parcel Data: The GIS parcel data is the foundation for the Massage Establishment Analysis. This data is encoded with all corresponding Assessor Parcel Numbers (APN) in the City, allowing for the data to be linked to several data sources.

Tidemark Parcel Database: This database consists of unique records describing parcels within the City, as well as unique records describing the owners of each parcel. Each record in the database contains an APN, allowing the database to be linked to the parcel data used in the analysis; this allows variables such as Zoning District found in the Tidemark Parcel database to be mapped.

Variables in the Tidemark parcel database include general location information such as APN and site address. Site description variables include parcel dimensions (area, depth, and constrained land measurements) and vacancy status. Land use variables include current use of the property, zoning district, General Plan land use designations, and specific plan inclusion, if any.

Business License Address Excel: Business license and city maintained data was used to create a master file to map and locate the Existing Massage Establishments in the City. The data was provided as an Excel worksheet and included the business name, establishment address, and Owner Name for each establishment.

In addition, the Planning Commission adopted the 250-foot separation requirement in lieu of the 500-foot requirement for it was determined that secondary impacts of massage uses on residentially zoned properties were significantly and sufficiently

reduced at 250 feet. Imposing the 250-foot separation requirement would allow the City to regulate the potentially illegitimate operators without significantly limiting the number of parcels that a legitimate operator is conditionally permitted to operate in the City as a Massage Establishment use. At the hearing, Police Department staff indicated that majority of the current businesses that offer massage services as primary or ancillary uses are legitimate operators and that potentially illegitimate massage uses are very few and that by imposing a 500-foot separation, this would result in over-regulation of the land use and the strict limitation of legitimate Massage Establishments in the City.

Staff with the aid of a consultant analyzed the issue to determine the proper distance separation between Massage Establishments and residentially zoned properties. The initial assessment focused on identifying the existing Massage Establishments and their zoning districts. Measurements were analyzed to determine the distance of existing massage establishment to the nearest and to the farthest residential zoned district measured from property line to property line. The analysis also determined the number of parcels that would be permitted, and the number of existing establishments that would be conforming and nonconforming if a distance requirement of 250 feet or 500 feet were established from residential districts. The Central District Specific Plan was not included in the analysis because the majority of land uses in this district are commercially oriented (i.e., mixed use) and would not be affected by the distance separation requirement.

Based on the analysis, the farthest distance of existing Massage Establishment property from a residentially zoned property is 1,217 feet. The nearest distance of existing Massage Establishment property abuts a residentially zoned property. Of the 65 existing Massage Establishments operating currently in the city, the average distance separation of the massage use from residentially zoned property is 91 feet. These distances were measured from property line to property line.

There are a total of 65 Massage Establishments Citywide; 30 of the establishments are located in the Central District. Imposing a 250 feet distance requirement from residentially zoned property would cause 31 of the 35 existing massage establishments (outside the Central District) to become non-conforming. Imposing a 500 feet distance requirement would cause 34 of the 35 existing massage establishments (outside the Central District) to become non-conforming.

The proposed amendment will provide a definition of a Day/Health Spa use. A Day/Health Spa is defined as any premises, place of business or membership club providing facilities devoted especially to health, beauty, and relaxation which deal with the cosmetic, therapeutic, and/or holistic treatments for women and men, where people visit for professionally administered personal care treatments, and where less than 20 percent of the establishment (gross floor area) is designated (permanently or temporarily) as massage/treatment rooms (partially or fully enclosed). Medical Spa shall be classified as a Medical Office land use.