

Comments Letter

A-1-



October 9, 2017

County of San Diego, Planning & Development Services
Marisa Smith, Land Use and Environmental Planner
5510 Overland Avenue, Suite 310
San Diego, CA 92123

SUBJECT: COMMENTS ON CHINESE BIBLE CHURCH DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

Dear Ms. Smith:

The City of San Diego ("City") Planning Department has received the Draft Supplemental Environmental Impact Report (Draft SEIR) for the Chinese Bible Church Specific Plan Amendment, Major Use Permit, and Open Space Vacation prepared by the County of San Diego (County) and distributed it to applicable City departments for review. The City, as a Responsible Agency under CEQA, has reviewed the Draft SEIR and appreciates this opportunity to provide comments to the County.

The City's Transportation and Storm Water and Developmental Services Departments provided comments to the County on the Draft SEIR for this project, as further detailed below.

Transportation & Storm Water – Mark G. Stephens, Associate Planner –
MGStephens@sandiego.gov, 858-541-4361

Appendix M – CEQA Drainage Study: Attachment B - Hydrology Maps; Existing Condition Hydrology Map (Attachment B-1) and Proposed Condition Hydrology Map (Attachment B-2). These two maps do not clearly depict the storm drain conveyance system after the ultimate discharge point for pre-project runoff or post-project runoff for the natural drainage channel or wash, and relative to the proposed Grace Way project access from Four Gee Road. Grace Way should be depicted in overall drainage maps.

Development Services – Leo Alo RTE, Associate Traffic Engineer – **LAlo@sandiego.gov, 619-446-5033**

Regarding the DSEIR:

1. Section 3.1.6.3, page 3-101: The DSEIR should provide expected weekday trip generation based on the actual existing weekday trips at the three existing church sites and on the projected programs to be provided at the proposed site.

Response to Comments Letter

A-1-

A-1-1 The County of San Diego (County) appreciates the review of the Draft Supplemental Environmental Impact Report (DSEIR) by the City of San Diego (CSD). The comment asserts the CSD is a Responsible Agency under the California Environmental Quality Act (CEQA). The County concurs with the comment because CSD approval would be required for some work taking place in areas under its jurisdiction. The DSEIR Table 1.5.1 (Matrix of Project Approvals of DSEIR) has been modified to reflect this.

A-1-2 The comment relates to the department in the CSD commenting on the DSEIR. The County appreciates the comment. Comments by the City's Transportation Storm Water and Developmental Services Department have been reviewed and a full response to the comments is provided below.

A-1-3 The comment states that the hydrology maps included in Appendix M - CEQA Drainage Study: Attachment B - Hydrology Maps; Existing Condition Hydrology Map (Attachment B-1) and Proposed Condition Hydrology Map (Attachment B-2) do not clearly depict the storm water drain conveyance system. The maps portray the existing and proposed drainage systems, as noted. Attachment B-1 is the Existing Condition Hydrology Map. As such, it would not include proposed improvements like the Grace Way street construction, although the entry would be within Sub Area A-43 as shown on the map. Attachment B-1 calls out and depicts the existing 18-inch storm drain that crosses under the existing driveway into the project. This provides illustration of the existing storm drain conveyance system for pre-project runoff. The existing runoff downstream of the project in the wash north of the site flows to the west under Four Gee Road in an existing box culvert.

Attachment B-2 is the proposed or developed condition Hydrology Map and shows the proposed Grace Way as being within Sub Area B-8 adjacent to Four Gee Road. Conveyance from the southwest is shown flowing to the west under Grace Way. Northern flows toward riprap and retention ponds are also depicted.

Please refer to Section 5.01.5 of the CEQA Drainage Study for a discussion of 100-year inundation limits near Four Gee Road. The analysis shows that the grading for Grace Way is not within or close to this area of inundation of a 100 year flood. The CEQA Drainage Study was included as Appendix M of the DSEIR. The County will include the comment as part of the Final SEIR for review and consideration by the decision-makers prior to a final decision on the project.

Comments Letter

A-1-

2. The 45,734 SF of accessory uses exceeds that of the primary church use (43,500 SF) at full buildout. The DSEIR should demonstrate how this will not cause an increase in project trips, both for weekdays and Sundays.
3. The DSEIR states that the project will interconnect the proposed signal at Four Gee Road/project driveway with the existing City traffic signal at Camino Del Sur/Four Gee Road. The project applicant should consult with the appropriate City of San Diego Traffic Engineering Operations staff in regards to coordinating the proposed traffic signal with the signal at the intersection of Camino Del Sur/Four Gee Road. Please note that due to the higher volumes on Camino Del Sur, cross streets may not be given as much green time as projected or expected in the DSEIR.
4. Section 3.1.6.3, page 3-104: The project proposes to signalize the intersection of project driveway at Four Gee Road as a project feature. However, Impact No. HZ-1 is proposing the traffic signal as mitigation M-HZ-1. This discrepancy should be corrected.
5. Section 3.1.6.3, page 3-105: The DSEIR states that interconnecting the proposed traffic signal with the signal at Camino Del Sur/Four Gee Road would avoid excessive queues. However, Table 3.1-2B Future Queue Analysis shows that queues are still in excess of the storage capacity in several cases. This should be addressed, especially as it relates to the potential for northbound queues backing up past Tallus Glen and southbound queues backing up into Camino Del Sur.
6. Section 3.1.6.3, page 3-105: The DSEIR states that the Project contributes less than 50 freeway segment trips in the peak direction. However, the number of freeway segment trips is not stated in the DSEIR or the Traffic Impact Study. This omission should be corrected.

A-1-5

A-1-6

A-1-7

A-1-8

A-1-9

Regarding the Traffic Impact Study (TIS). Appendix B to the DSEIR:

1. The TIS mentions a proposed daycare facility which is not explicitly discussed. The TIS should provide expected weekday trip generation based on the actual existing weekday trips at the three existing church sites and on the projected programs to be provided at the proposed site.
2. Section 3.5.2 of the TIS evaluates Near Term Without Project conditions, but appears to show in Table 9 that no additional trips over existing were added to represent further development of Black Mountain Ranch North Village, where construction is ongoing. There trips should be included in the Near Term analysis and assumptions regarding level of development should be clearly described in this section. This section should also clearly state what, if any, roadway network improvements were assumed over Existing.
3. Section 3.7 should describe any specific network improvements assumed within the study area for 2050 conditions.
4. Section 3.8.3 "Special Events" of the TIS states all anticipated special events will be performed during off peak hours, i.e. not Monday through Friday 7-9 AM or 4-6 PM. Since the document does not evaluate the impact of special events during these peak hours, it is recommended that this statement be made a project permit condition.

A-1-10

A-1-11

A-1-12

A-1-13

A-1-14

Response to Comments Letter

A-1-

- A-1-4** This comment states that the DSEIR should provide expected weekday trip generation based on the actual existing weekday trips at the existing church sites. The weekday trip generation estimates were provided in Table 3.1-24 of the DSEIR and were based on standard rates established in the *(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region* (SANDAG 2002). This manual provides standards and recommendations for the probable traffic generation of various land uses based upon local, regional and nationwide studies of existing developments in comparable settings. The activity and trip generation at the existing church sites is not pertinent since published trip generation rates are used, as dictated by the methodology used in the traffic analysis. The County will include the comment as part of the Final SEIR for review and consideration by the decision-makers prior to a final decision on the project.
- A-1-5** This comment states that the DSEIR should demonstrate how the proposed accessory uses on the project site at full buildout will affect project trips. The sanctuary building capacity is the driving factor for trip generation because church attendance drives all other activities on the site. Attachment A Supplemental Traffic Memorandum response 1.b. states, "The 43,500 s.f. amount is for the sanctuary building. In discussions between the project team and the County it was concluded that the driving factor for trip estimation is the square footage we used for sanctuary and administrative use rather than the ancillary buildings that are in the proposed plan. For the supplemental analysis we have used all of the square footage for the project for calculating weekday trips with the SANDAG rate." No further response is necessary.
- A-1-6** This comment requests that the project applicant coordinate with the City of San Diego Traffic Engineering Operations staff for signal timing coordination for Camino del Sur/Four Gee Road. The County concurs with the comment. Coordination has already taken place between the County and City of San Diego staff and that will continue.
- A-1-7** This comment states that there is a discrepancy between identifying the signalization of the intersection of Four Gee Road as a project feature, and as mitigation measure M-HZ-1. The signalization of this intersection is proposed as

A-1-7 part of the project design; however, additional requirements for this intersection are also included in mitigation measures M-HZ-1 to mitigate for potential delays to emergency vehicle response from the fire station. This includes the requirements for the signal to be strobe controlled, to be interconnected to the signal at Camino del Sur/Four Gee Road, and the provision of road striping of “Do Not Block” to be painted in front of the church entrance. The additional requirements will allow fire station personnel to control traffic so that emergency vehicles can safely exit the fire station unimpeded in an emergency.

A-1-8 This comment addresses queues and storage capacity related to the intersection of Camino del Sur/Four Gee Road. The inter-connection of the proposed signal with the Camino Del Sur/Four Gee Road intersection will assist in clearing traffic as it exits the site. The traffic study (Appendix B, page 64) states:

The estimated maximum vehicle queue for the south bound leg at 4 (sic) Gee Road and Camino Del Sur would at times exceed the capacity. However, once the intersections are interconnected, any queue that accumulates would be mitigated. Having both signals coordinated allows the controller to respond to sudden surges/variations in traffic demand in order to steal time from phases that don’t need it and give times to phases that do need it to decrease the amount of queue and delay.

It is anticipated that at the design stage pavement markings will be introduced as appropriate to advise and restrict motorists from blocking nearby intersections. The County will include the comment as part of the Final SEIR for review and consideration by the decision-makers prior to a final decision on the project.

A-1-9 This comment states that the specific number of freeway segment trips is not stated in the DSEIR or Traffic Impact Study. The commenter is correct that the DSEIR states that the Project contributes less than 50 freeway segment trips in the peak direction. The February 14, 2018 Tech Memo by KOA, which contains the latest available traffic counts, provides the following information. The first attachment in the tech memo shows the project trip generation as a total of 392 daily trips. Of these, 20 two-way trips occur in the AM, of which the greater amount of 12 are inbound in the AM. The remainder are outbound. In the PM there are 31 two-way trips, of which 16 are outbound in the PM peak hour. As had previously been shown in the full Traffic Impact Analysis, roughly half of these trips are directed to and from the vicinity of the I-15 freeway. This indicates that the AM has about 10 two-way trips, of which 6 are inbound from the freeway. In addition, 16 two-way trips occur in the PM peak hours, of which about eight are outbound towards the freeway.

- A-1-9** The County's publication "Report Format and Content Requirements: Transportation & Traffic" dated Aug. 24, 2011 provides guidance on when freeway segments should be included in traffic analyses. As shown in Table 1 on page 2, projects with 200-500 daily trips would typically, at most, require only an Issue Specific TIS, and that does not include freeway analysis. Since the interchange between I-15 and Camino Del Norte is in the City of San Diego, we can turn to their guidelines for some further assistance. The City of San Diego "Traffic Impact Study Manual" on page 6 describes that "mainline freeway locations where the project will add 150 or more peak hour trips in either direction" should be included in the scope of a traffic study. As discussed, this project, at most, would add eight trips in or outbound to the freeway directionally, which is below the 150 trip threshold. Therefore, given the limited amount of project trips that are even directed towards the freeway, and the various guidelines for including a freeway analysis, it is logical that they are not included in this traffic study.
- A-1-10** The comment states that the TIS mentioned a proposed daycare facility. A daycare facility is not proposed as part of the project. A previous version for the project included a daycare facility; however, the project was revised to remove this use. An errata to the Traffic Impact Study has been prepared and included in Appendix B of the DSEIR removing reference to a day care facility in Section 1.2 on page 2 of the Traffic Impact Study.
- A-1-11** This comment addresses the Near Term traffic analysis, specifically relating to assumptions for the Black Mountain Ranch North Village. The comment states that additional trips over existing for Black Mountain Ranch North Village should be included in the Near Term analysis. Section 3.5.1, page 39, of the Traffic Impact Study (Appendix B of the DSEIR) discusses the development of cumulative volumes in the area, which include specific projects and SANDAG's growth assumptions in Series 12. Series 12 includes allowance for the Black Mountain Ranch project that combined with the explicit projects listed in Table 9, results in a 27 percent increase in traffic volumes in the area. No changes to the DSEIR or Traffic Impact Study are required. The County will include the comment as part of the Final SEIR for review and consideration by the decision-makers prior to a final decision on the project.

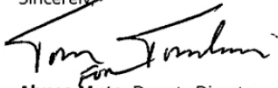
Comments Letter

A-1-

Thank you for the opportunity to provide comments on the Draft SEIR. Please contact me directly if there are any questions regarding the contents of this letter or if the County would like to meet with City staff to discuss our comments. Please feel free to contact Kurtis Steinert, Associate Planner, directly via email at KSteinert@sandiego.gov or by phone at 619-235-5206.

A-1-15

Sincerely,



Alyssa Muto, Deputy Director
Planning Department

AUTHOR'S INITIALS (UPPER CASE)/typist initials (lower case)

cc: Reviewing Departments (via email)
Review and Comment online file

Response to Comments Letter

A-1-

A-1-12 This comment states that roadway network improvements for Black Mountain Ranch North Village should be stated in the Traffic Impact Study. During the course of the traffic report preparation, the connection of Black Mountain Road to Camino Ruiz at 4 Gee was completed. This was updated in the traffic report prior to inclusion in the DSEIR. No other improvements were assumed in the Existing in the Near Term analysis. No changes to the DSEIR or Traffic Impact Study are required. The County will include the comment as part of the Final SEIR for review and consideration by the decision-makers prior to a final decision on the project.

A-1-13 This comment states that Section 3.7 of the Traffic Impact Study should describe network improvements assumed for 2050 conditions. All of the study area segments considered in the 2050 analysis have already been built out to their capacity with no additional improvements. No changes to the DSEIR or Traffic Impact Study are required. The County will include the comment as part of the Final SEIR for review and consideration by the decision-makers prior to a final decision on the project.

A-1-14 This comment states that the timing of special events should be included as a project condition. As noted on page 3-75 of the DSEIR, any special events, other than typical church holidays, including non-church community events, would take place during off peak hours and outside typical church daily operation schedules. The hours of operations for special events will be specified in the Major Use Permit conditions.

A-1-15 This comment provides closing remarks and does not raise any additional environmental issues and, therefore, no further response is required.