

4S SFV MPAC

4S Santa Fe Valley Mega-Project Abatement Coalition

October 8, 2017

Department of Planning and Development Services

County of San Diego

ATTN: Marisa Smith, Project Manager

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San Diego, CA 92123

Subj: Collected Comments to CBC DSEIR from residents and members of the Mega Project Abatement Coalition (MPAC)

Ref: Chinese Bible Church of San Diego

PDS2014-SPA-14-001, PDS2010-3300-10-037(MUP), PDS2012-3940-12-002(VAC),

PDS2010-3910-9508007L(ER), SCH# 214011018

Below are a set of collected comments from neighbors and members of the MPAC on the Draft Supplemental Environmental Impact Report (DSEIR) the Chinese Bible Church of San Diego, the Project as identified in the DSEIR.

As stated in the DSEIR, the Project site is located within the 888-acre Planning Area V in the northeastern portion of the SFVSP area. The site is part of sub-area 6. Designated as "Low-Medium density," the sub-area allowed up to a total of 67 dwelling units on the 71 acres. Sixty three (63) residential lots were developed as part of the Salvati project. A subsequent subdivision, Tentative Map (TM) 5123, was proposed to subdivide the remaining four lots on 9.09 acres, but that TM was not finalized and the site remains a single lot (APN 678-060-27-00). The Project site comprises this remainder lot and an off-site lot adjacent to Four Gee Road to be used for access purposes.

The County General Plan regional category for the site is Semi Rural (SR). The site is located in the San Dieguito Community Plan Area (SDCPA), and has a land use designation of SPA (Specific Plan Area [Santa Fe Valley Specific Plan]). The proposed use is allowed in the SR category with approval of a Major Use Permit (MUP). The Project proposes to develop a church campus in two phases.

The project is requesting a Specific Plan Amendment (SPA) to allow a religious assembly use and a Major Use Permit (MUP) to regulate the church and proposed uses and potential impacts to the community. Applicant is also proposing an open space easement vacation (VAC) of 0.3 acres to accommodate the main entry and to vacate a flowage or flooding easement of 0.28 acres, and an exception request to current zoning to allow for additional building heights for a building and three tower elements.

O-4-1

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- O-4-** The comment states that the comments that follow are from the neighbors and members of the Mega-Project Abatement Coalition (MPAC). The County of San Diego appreciates the comments on the Draft Supplemental Environmental Impact Report (DSEIR) by the 4S Santa Fe Valley San Diego Mega-Project Abatement Coalition (4SSFV). The County acknowledges the comment as an introduction to the comments that follow. No further response is required or necessary.
- O-4-** The comment restates characteristics of the proposed project. The County agrees that the statements are factual. No changes to the DSEIR are required as a result of the comment.

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As drafted, the DSEIR and technical studies are invalid and have numerous deficiencies including the following:

- The land use section is not included as Chapter 2 but in Chapter 3, Environmental Effects Found Not to Be Significant. However, the project is for discretionary permit applications to amend the SFVSP to allow a previously not-permitted use and an MUP—both are land use related issues and yet the Land Use section was not included in the Significant Environmental Effects of the Proposed Project section of the DSEIR. This is an error in determining which issue areas have the potential for significant impacts; an MUP would not be required if it wasn't a use that demands regulation and has a significant potential impact.
- The traffic/circulation section is not included as Chapter 2 but in Chapter 3, Environmental Effects Found Not to Be Significant. Traffic is a significant issue with the new Del Sur town center and to bury traffic in Chapter 3 is an error in determining which issue areas have the potential for significant impacts.
- The Project would be incompatible with the existing neighborhood, including hours of operation, nighttime lighting, noise, and building heights
- MUP findings related to bulk and scale, harmful effect on desirable neighborhood character, the generation of traffic and the capacity and physical character of surrounding streets; and the suitability of the site for the type and intensity of use or proposed development cannot be made
- The biological open space and Artesian Creek would be negatively affected and transitions between open space and development are not provided
- Traffic loads would be unsafe and would contribute to already bad traffic congestion in the area and emergency response times would be impeded by traffic
- Parking impact on neighborhood streets due to inadequate off-street parking
- Annual flooding and hydro-modification of the site
- Visual effects would impact surrounding community
- Impacts to historical resources
- Impacts to biological resources and edge effects to the adjacent protected wetlands
- Retaining wall would impact Artesian Creek flows in a floodplain
- Trees, some of which are over 50 years old, would be affected
- Cooking smells introduced into the area
- Re-sale value of homes adversely affected due to incompatible land use, hours of operation until 10 pm seven days a week including special events with audio systems.

There are numerous inadequacies and insufficient data in the SDEIR and Technical Studies to complete a thorough and CEQA compliant environmental analysis.

LAND USE & PLANNING ANALYSIS AND ADDENDUM

The County of San Diego General Plan Regional Categories Map identifies the project site as "Semi-Rural." The project site is within the SFVSP, as amended in 2013. The project site is within Planning Area (PA) V-Subarea V.6 of the SFVSP. This portion of

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O-4-3 The comment states that land use should be classified as a significant impact because the project requests a previously non-permitted land use and a Major Use Permit (MUP). The land use analysis evaluated the effects of allowing a religious assembly use on the site. It determined that land use effects of the project are not significant (See DSEIR Appendix O, Chapter 6.0, page 57) because the proposed use is consistent with existing land use in the area, and the project includes numerous design features that preclude significant impacts. These include operational controls through use of a MUP, clustered building placement, high quality building design, and extensive landscaping.

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The request for a Specific Plan Amendment (SPA) or a discretionary permit do not in themselves require that land use be considered significantly impacted. The comment is correct in noting that a MUP is required because the project requires on-going regulation. However, a MUP would be required for religious assembly on the project site regardless of whether there is a significant environmental impact. 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.

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O-4-4 This comment states that the traffic/circulation analysis should be included in Chapter 2 because it is a significant issue. A traffic study was prepared for the project and was included as Appendix B of the DSEIR (KOA 2017). Based upon that analysis, traffic impacts were determined to be less than significant. The potential traffic impacts of the project were appropriately analyzed in the traffic impact study and summarized in Section 3.1.6 of the DSEIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is 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.

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O-4-5 The comment states that the project would be incompatible with the existing neighborhood due to hours of operation, lighting, noise, and building heights. The comment addresses general subject areas, which received extensive analysis in the DSEIR. Please see General Response 1, "Planning and Land Use" (PLU) for a detailed discussion of these issues. The comment does not raise any specific issue regarding the analyses included in the DSEIR and, therefore, no more specific response can be provided or is required. The comment will be included in the Final SEIR that will be made available to decision makers prior to their decision about the project.

- O-4-6** The comment states MUP findings cannot be made for the project due to issues of bulk and scale, neighborhood character, traffic, and intensity of use. Please see EIR Section 3.1.4.3 "Physical Compatibility with Surrounding Areas/Community Character", starting on page 3-76 for a detailed discussion of these issues. The Land Use and Planning Analysis (DSEIR Appendix O, Chapter 1.0) presents a detailed review of all uses in the vicinity and nearby area that would be affected by the project. Chapter 2.0 of the analysis demonstrates that in light of existing conditions in the area, the project would meet all the required findings necessary for project approval when considering the surrounding uses. These include a consideration of bulk, scale, density, and coverage, land form alteration, design elements, and operations. The comment does not raise any specific issue regarding the analysis included in the Draft SEIR. The comment will be included in the Final SEIR package that will be made available to decision makers prior to their decision about the project.
- O-4-7** This comment states that the biological open space and Artesian Creek would be negatively affected. The comment also states that transitions between open space and development are not provided. Potential impacts to biological resources received extensive analysis in the Draft EIR, specifically in Section 2.2 Biological Resources. The project will not directly impact the existing biological open space of the creek to the north. Indirect impacts are addressed through design, setbacks, and barriers to entry. The comment does not raise any specific issue regarding the biological analysis and, therefore, no more specific response can be provided or is 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.
- O-4-8** This comment states traffic volumes would be unsafe and emergency response times would be delayed. Potential impacts to traffic and hazards as they relate to emergency services received extensive analysis in the Draft SEIR, specifically in Section 3.1.6 Traffic and Section 2.4 Hazards – Fire Safety and Hazardous Chemicals. Existing traffic volumes were collected as part of the traffic report preparation and were included in Table 3.1-22. Forecasted traffic volumes were determined for the Existing + Project Scenario (Table 3.1-22 and 3.1-23), the Existing + Ambient + Cumulative Scenario (Table 3.1-30 and Table 3.1-31) and the General Plan Scenario (Table 3.1-32). All segments and intersections will operate at an acceptable level of service.

- O-4-8** With regard to emergency response, this was analyzed as part of the public services analysis (Section 3.1.5) and the Hazards analysis (Section 2.4) of the DSEIR. The required response time for semi-rural areas, per the Safety Element of the County General Plan, is five to ten minutes. It is expected that Fire Station No. 2 would be able to reach the project site in approximately two minutes, since it is located across the street from the project site. Additionally, the project will be required to implement mitigation measures M-HZ-1 as a condition of project approval. This mitigation measure further enhances fire service response by requiring the intersection of Four Gee Road and Grace Way to be signalized. This signal shall be capable of being controlled from Fire Station No. 2, which is located directly across from Grace Way. The purpose is to allow fire station personnel to control traffic so that emergency vehicles can safely exit the fire station unimpeded in an emergency. The signal at the intersection of Camino Del Sur and Four Gee Road shall be connected to this control system so that fire personnel can coordinate signal changes between the two intersections, which are in close proximity to one another. The ability to coordinate the intersection signals will prevent delays in response time as a result of church-related activities. Additionally, road striping "Do Not Block" shall be painted in front of the Fire Station entrance. These measures will be completed prior to occupancy of the facilities. 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.
- O-4-9** The comment states the project would have impacts on neighborhood streets due to inadequate off-street parking. The project would provide 417 parking spaces, in excess of County requirements for on-site parking, which is 375 spaces. The project also proposes an overflow parking area to accommodate cars during special events. A shuttle will be operated by the church to reduce the number of cars entering the neighborhood. Congregants will also be asked not to park off-site. The ample on-site parking provided, in conjunction with these design measures, will prevent off-site parking from becoming a major issue.
- O-4-10** The comment states the technical studies and EIR are inadequate because of annual flooding and hydro-modification of the site. The drainage report for the project (Appendix M), Section 5.01, states the project will not create or contribute to runoff that would exceed existing storm drain capacities. For example, most of the parking areas and walkways will use porous surfaces to facilitate drainage. Any increased runoff from the site will be addressed by inclusion of hydromodification Best Management Practices (BMPs) in the drainage system. The comment does not raise any specific issues regarding annual flooding and hydromodification, therefore, no further response is required.

- O-4-11** The comment states that visual effects would impact the surrounding community. Visual effects were evaluated in the visual technical report (Appendix C) and are provided in the DESIR (Chapter 2.1). The report concluded that, with mitigation, the project's visual effects would be reduced to below a level of significance. The comment does not raise any specific issue regarding the visual resources analysis and, therefore, no more specific response can be provided or is 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.
- O-4-12** This comment states that there will be impacts to historical resources, but does not provide additional information to support this assertion. An historical resources technical study was prepared for the project (Moomjian 2016) and was included as Appendix G of the DSEIR. The Bunk House and Ranch House have not been determined to be historically and/or architecturally significant and, therefore, are not historical resources. Consequently, the Project's destruction, disturbance, or alteration of either building will not cause a substantial adverse change in the significance of historical resources. As such, a less than significant impact is identified and no mitigation is required. The comment does not raise any specific issues regarding historical resources, therefore, no further response is required.
- O-4-13** This comment addresses biological resources, including edge effects on the adjacent preserved wetlands. Edge effects were analyzed in the DSEIR Section 2.2.3.1 on pages 2-47 and 2-48. The comment does not raise any specific issues regarding biological resources, therefore, no further response is required.
- O-4-14** The comment states that the retaining wall would impact Artesian Creek flows in a floodplain. The drainage report for the project (Appendix M), Section 5.01, states the project will not impact off-site drainage patterns. 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.
- O-4-15** This comment states that trees would be affected. The on-site trees were evaluated for their biological and aesthetic value. The biological resources analysis (Klutz Biological Consulting 2016, DSEIR Appendix E) concluded the trees are not a significant biological resource (DSEIR Appendix E). The visual analysis concluded that while some trees are a visual amenity on the site, they would be replaced by a landscaping plan that would afford a different but equally appealing visual experience (Appendix C). The comment does not specify which trees are of concern to the commenter, and does not provide any specific information on the affects to the trees in question. 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.

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- O-4-16** This comment addresses potential odors from cooking. The project proposes a café to serve the needs of the congregation. Potential odor impacts from the project on surrounding uses were evaluated in the air quality study (DSEIR Appendix K). The report concludes in Section 4.5, page 49+ that there would be no odor impacts from the project. Cafes are regulated by the County of San Diego through the Department of Environmental Health (DEH). All restaurants must have a permit and the DEH conducts regular inspections of restaurants to ensure health and safety standards are met. Section 6318 of the San Diego County Zoning Ordinance requires all commercial and industrial uses "be operated as not to emit matter causing unpleasant odors which is perceptible by the average person at or beyond any lot line of the lot containing said uses." Section 6318 goes on to further provide specific dilution standards that must be met "at or beyond any lot line of the lot containing the uses." The proposed use would be subject to these regulations.
- O-4-17** This comment states home values in the vicinity would be negatively impacted by the project due to land use, hours of operation, and noise. Home values are not a subject that is evaluated under the California Environmental Quality Act, and therefore, was not analyzed in the DSEIR. This comment will be included in the Final SEIR that will be made available to decision makers prior to their decision about the project.
- O-4-18** The comment states that there are numerous inadequacies and insufficient data in the DSEIR and technical studies, though specific items are not raised in this comment and therefore, no response is provided. All comments made in the 4SSFV letter will be included in the Final SEIR package that will be made available to decision makers prior to their decision about the project.
- O-4-19** The comment reviews details of the project proposal. The County agrees these details are accurate.

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the SPA is designated for Low-Medium density residential uses (1 unit per 1–1.9 acres). The property is zoned Specific Plan (S88).

Designated as “Low-Medium density,” the sub-area allowed up to a total of 67 dwelling units on the 71 acres. Sixty three (63) residential lots were developed as part of the Salviati project. The site is located in the San Dieguito Community Plan Area (SDCPA), and has a land use designation of SPA (Specific Plan Area [Santa Fe Valley Specific Plan]). The proposed use requires approval of a Major Use Permit (MUP).

As demonstrated on Figure 5 of the Land Use & Planning Analysis (LUPA) and within the DSEIR, the project site is surrounded by existing residential and protected open space to the north and west. The SFVSP did NOT intend to allow a mega commercial use adjacent to residential and open space. As shown in Figure 4 and review of the SFVSP, specifically subarea V.6, the subject site was intended to accommodate single family, estate lots and religious assembly was never intended to be a permitted use. To drastically change the land use from Low-Medium to allow a mega religious assembly is poor planning and clearly inconsistent with the intent on an approved Specific Plan. As stated by Lois Jones, who participated in developing the plan, when the project was presented to the San Dieguito Community Planning Group several years ago, “We never intended this parcel to have a use like this project contemplates.”

The Land Use & Planning Analysis provides extensive discussion of the uses within one mile of the site, but not the uses immediately adjacent to the project, which would have been more appropriate regarding height, scale, bulk and most importantly USE. This key compatibility issue is minimized while the focus of more intense uses further from the site are central to the justification of the analysis. Such attempted justification flies in the face of General Plan Policy “LU-1.5 ... Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands.” Furthermore, because the project is adjacent to open space it must abide by Policy LU-10.2 of the General Plan, which states, “Development—Environmental Resource Relationship. Require development in Semi-Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas.”

The site has open space and residential all around it (48% open space, 45% single family residences and 7% multifamily residences). The larger, more intense multi-family development (The Reserve) is separated from the site by a major arterial roadway—clearly a different and distinct neighborhood that is not a fair or transparent comparison. In addition there is a county park property on the west side of Four Gee Road and open space farther west beyond the fire station.

The justification provided on page 13 of the LUPA states “Because this property is next to the 4S Ranch Village and the General Plan states that in Semi-Rural areas “Higher densities within the allowable range should be located near Village areas...” (GP page 3-

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O-4-20. The comment states the Santa Fe Valley Specific Plan (SFVSP) did not intend to allow a large scale commercial use adjacent to residential and open space. The site is currently designated as low density residential, as noted in the comment. However, all specific plans are designed to permit modifications to take into account changing circumstances. The County does not dispute points of view that may have been held when the Santa Fe Valley Specific Plan (SFVSP) was enacted. However, the plan then acknowledged that changes are permissible and changed circumstances may warrant changes to the plan. The County required an EIR for the project so that the physical reality of these changed circumstances could be evaluated. The DSEIR found that the land uses in the area have changed and that the proposed use is consistent with those changes.

O-4-21 This comment addresses the analysis in the Land Use & Planning Analysis (RECON Environmental 2016, DSEIR Appendix O), and states that the analysis does not analyze the uses immediately adjacent to the project site. The report was prepared to analyze the compatibility of the proposed Chinese Bible Church project. Therefore, it includes a discussion of the project’s consistency with the Santa Fe Valley Specific Plan (SFVSP) (see Section 4.3). As a project-level consistency document, the report does not include a discussion of density distributions throughout the SFVSP area. The project is consistent with General Plan policies LU-1.5 and LU-10.2, as discussed in Responses O-4-22 and O-4-24. As stated there, the project is consistent with the existing land use plan which is characterized as a suburban development with protection of open space areas.

The project is consistent with General Plan policies LU-1.5. The policy states in full: “Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.” The land use report relies on the full spectrum of uses in the area in determining land use compatibility. These include the following uses within the jurisdiction of the County of San Diego: adjacent open space, the fire station, the Salviati residential development, residential development to the northwest, the proposed school site, and development beyond the fire station, such as the Bel Etage residential development. A comprehensive analysis of land uses in the area is dictated by the California Environmental Quality Act (CEQA), as stated in Section 15125: “An EIR must include a description of the physical environmental conditions in the vicinity of the project.” The County has coordinated with the City of San Diego, which has jurisdiction over the areas east and south of the site, and include 4S Ranch, La Viña residential development, and Black Mountain Ranch North Village among others.

O-4-22 The comment states that the project must abide by Policy 10.2 of the General Plan. The project meets the requirements of the policy because it preserves open space on and adjacent to the site. No direct impacts to the northern open space are proposed and project design measures such as fencing, setbacks, lighting controls, and grade differential will minimize indirect impacts. The open space to the west is a narrow strip approximately 220 feet wide that ends at the project's southwest corner. The project would impact 0.17 acres of this area. It mitigates this impact by proposing mitigation measure M-BI-1 (DSEIR Section 2.2.6), which states:

Direct impact to 0.3 acre of offsite non-native grassland shall be mitigated at a 1:1 ratio in conformance with the MSCP and BMO through preservation of similar or higher value habitat. Mitigation shall occur at the Crestridge Mitigation Bank in Lakeside, California or any other land determined acceptable by the Director of the Department of Planning & Development Services. Note that the mitigation ratio for non-native grassland is typically 0.5:1. A doubled ratio is required here since this area is located within a dedicated open space easement. Pursuant to the County Report Format and Content Requirements – Biological Resources, if existing dedicated biological open space easements are being vacated, the loss of preserved habitat should be mitigated at twice the required ratios because the original mitigation must be replaced and the current loss of habitat must be mitigated.

Additionally the project design has minimized impacts to this open space by locating the entrance as close to the end of the open space as possible to limit biological impacts associated with biological dead ends. 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.

O-4-23. The comment states the site has open space and residential uses all around it and that the multi-family development known as The Reserve is not a fair comparison for use in the land use discussion because it is separated from the site by a major roadway. All uses in the vicinity were included in the land use analysis in order to present a balanced representation of uses in the area. This includes single family and multi-family residential uses, open space, civic uses, and open land, all uses immediately adjacent to the site. Uses farther from the site, such as The Reserve and Black Mountain North Village, were included because they share land use features with the proposed site such as roadways, transportation links, and viewshed. The comment also notes there is a County park west of Four Gee Road and open space farther west of the project. There are no County or City of San Diego parks west of the site, according to a review of the County Parks and Recreation's inventory of parks and the City of San Diego's inventory of parks. The open space west of the site is included in the existing viewshed inventory (Section 2.1.2.2) and was included in the DSEIR analysis. That section notes that "The large open space area along Four Gee Road north of the fire station is reserved for a park and an elementary school (page 2-5)." These uses are planned but have not been approved or processed. These uses are therefore speculative and are not included in the DSEIR analysis.

O-4-24 This comment addresses the analysis in the land use report. The report was prepared to analyze the compatibility of the proposed Chinese Bible Church project. It includes a discussion of the project's consistency with the Santa Fe Valley Specific Plan (SFVSP) (see Section 4.3 of the report, DSEIR Appendix O). As a project-level consistency document, the land use study does not include a discussion of density distributions throughout the SFVSP area. Inclusion of the Black Mountain Ranch North Village is appropriate because it is very close to the project site and existing community. Intervening residential uses are acknowledged in the overall analysis, as discussed in Response O-4-22 paragraph 1 above. The project is consistent with General Plan policies LU-1.5 and LU-10.2, as discussed in Responses O-4-22, -23. As stated in these responses, the project is consistent with the existing land use plan which is characterized as a suburban development with protection of open space areas.

O-4-25 The comment questions consistency with the General Plan and the SFVSP. General Plan consistency is analyzed in the DSEIR, Section 3.1.4.3. Two tables, 3.1-17, and 3.1-18, detail consistency issues with the General Plan guiding principles and the goals and policies. The project's conformance with General Plan policies 1.5 and 10.2 is addressed in responses 22 and 23 above. Conformance with the SFVSP is provided in Section 3.1.4.3 of the DSEIR, page 3-72+. The County allows Specific Plan Amendments (SPA) for the purpose of affording flexibility to future development within the specific plan area. In this case, SPA 14-001 is proposed to allow for a religious assembly use in Subarea V, with the approval of a Major Use Permit (MUP). Prior to approval of a MUP, the applicant must make findings to show that the project is consistent with Section 7358 of the Zoning Ordinance (see Section 1.7.2 of the land use report (Appendix O)). As further detailed in the land use report (DSEIR Appendix O, Section 2.0), the project would meet all the required findings necessary for project approval.

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8)), this property is suitable for a civic use, such as a church." What is being call a Village, more correctly the 4S Commons Town Center, is actually buffered by residential uses (the Reserve and single family 4S development) from the CBC property. Also, see the two GP policies quoted above. The LUPA does not address how densities were strategically, comprehensively and analytically distributed when the SFVSP was approved. The cited General Plan policy does not warrant approval of a project nor does it provide a comprehensive analysis of the exiting environment and how the project overall does or does not comply with the General Plan. Given an existing, approved Specific Plan, the project should develop within the regulatory framework of the Specific Plan and not allow an amendment that will adversely impact surrounding land uses. The General Plan accurately identifies the site as Semi-Rural; a mega development is NOT consistent with semi-rural development on any level.

The project is proposing to be allowed to operate from 8 a.m. to 10 p.m. seven days a week. This is a tremendous and egregious impact to the existing, quiet, family oriented residential homes. It is excessive and unacceptable to ask to operate, including maintenance activities, seven days a week up to 10 p.m.. This means, exterior noise, audio system, lights, equipment, noise, dust, vehicle noise—until 10 p.m. at night. This is clearly NOT a compatible or acceptable land use and undue burden on existing homes. The County should not amend the Specific Plan but enforce the existing Specific Plan to be fair and equitable to the community; and not set a precedence of spot zoning within an approved Specific Plan.

Planning and Land Use Analysis, Section 1.7.1 Specific Plan Amendment

The section of the DSEIR states "The project conforms with the goals and policies of the SFVSP goals and policies because religious assembly is similar to Land Use & Planning Analysis for the Chinese Bible Church other community facilities such as educational facilities and commercial facilities, such as group care." This conclusion makes no sense. Because there are other uses built in the community that are on property that are appropriately zoned for that use does NOT justify allowing a mega church to be built on a site surrounded by dedicated, protected biologically sensitive land use and existing detached single family residential. To grant an amendment to the Specific Plan based on this statement is not legally sound or coherent. The SFVSP intended the site to be developed as large estate residential lots; hence the zoning and General Plan category. To grant this amendment would be in direct conflict with the SFVSP and a classic case of spot zoning.

Section 1.7.2 Major Use Permit

A height waiver for the tower elements is requested as part of the MUP application. The design height ranges from 29 feet to 40 feet except for some architectural elements such as one 53-foot tower and other slightly smaller tower elements. The MUP process also allows for deviations to development standards of the applicable zone and designators, and is therefore, required for towers with heights in excess of the proposed height designator. The project can not make the required findings for the MUP in accordance with Section 7358 of the Zoning Ordinance:

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With respect to surrounding land uses, the project's compatibility with surrounding land uses is summarized in Section 6.0 of the Land Use and Planning Analysis. The project area is defined by residential uses along with existing and planned mixed-use, civic, employment, and commercial uses. Single-family residential areas vary from larger lots, which are further from the project site, to smaller and multi-family lots located in closer proximity to the project site. Additionally, the church proposes buffers between itself and other uses on all four sides that are compatible with the existing open space and the site grading would place the buildings at a lower elevation than surrounding development, reducing the perceived bulk and scale. Section 4.0 of the land use report provides a discussion of the project's consistency with the 10 guiding principles of the General Plan as well as the goals and policies of the San Dieguito Community Plan and SFVSP and found the project was consistent with them. Therefore, the project would not adversely impact surrounding land uses.

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This comment states the operational hours of 8 AM to 10 PM represent a tremendous impact on the existing quiet family homes. The comment is stating the commenter's opinion, and does not identify any inadequacies with the technical analyses nor the DSEIR. The operational profile of the project is of a facility with a low level of weekday activity, related to administration, maintenance, and meetings. Given the nature of the use, commercial deliveries will be minimal. Weekend use is focused on Sunday, when worship will be held. The great majority of activities will take place indoors, out of sight and hearing of the surrounding residents.

O-4-27

The County acknowledges the comment about not approving the Specific Plan Amendment. This comment will be included in the Final SEIR provided to the decision makers prior to making a final decision about the project. The DSEIR has shown that the project is consistent with surrounding uses in the area, which is largely developed and suburban in nature. The project does not represent spot zoning. Spot zoning is the application of zoning to a specific parcel of land within a larger zoned area when the rezoning is usually at odds with surrounding land uses. As discussed in the land use analysis (DSEIR Appendix O), the project would be consistent with the existing surrounding land uses.

O-4-29

O-4-28 This comment states that the statement in the land use analysis about project consistency (Appendix O, Section 1.7.1), makes no sense because the uses cited in the statement were built in accordance with current zoning. The DSEIR evaluates the physical and operational characteristics of the proposed project against the existing conditions in the community. The statement of similarity between the project and other uses is not therefore based on their zoning but on their physical characteristics. The DSEIR does evaluate the project's consistency with the RSFSP. Section 4.4, Point 2 of Appendix O speaks to the issue of community facilities.

The project's effect on surrounding biological resources (DSEIR Appendix E) was evaluated in the DSEIR. The biological report concluded the project would have significant but mitigable effects on biology. The DSEIR, Section 2.2.6, pages 2-54 and 2-55, details this mitigation. This comment also states that the project is an example of spot zoning. The project does not represent spot zoning. Please see response O-4-27 above. All comments made in the 4SSFV letter will be included in the DSEIR package that will be made available to decision makers prior to their decision about the project.

O-4-29 This comment addresses the proposed height exception that is requested as part of the MUP application. An exception request is proposed to allow the sanctuary building to be 40 feet versus 35 feet, and two towers to be 48 feet and one tower to be 53 feet. This would be consistent with surrounding land uses. This includes the fire tower located adjacent to the project site on the west, with a 53 foot tower, and apartments adjacent to the south, with a height of 40 feet, and nearby uses such as Del Norte High School with a maximum height of 57 feet, and the Design39 School with a maximum of 52 feet. The comment correctly states the findings that must be made before the MUP can be adopted. Chapter 2.0 of the Land Use and Planning Analysis (Appendix O) shows that in light of existing conditions in the area, the project would meet all the required findings necessary for project approval when considering the surrounding uses. These include a consideration of bulk and scale, lot size and coverage, land form alteration, design elements, and operations. This comment will be included in the Final SEIR that will be made available to decision makers prior to their decision about the project.

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1. Harmony in scale, bulk, coverage, and density.
2. Availability of public facilities, services, and utilities.
3. The harmful effect, if any, upon desirable neighborhood character.
4. The generation of traffic and the capacity and physical character of surrounding streets.
5. The suitability of the site for the type and intensity of use or development which is proposed.
6. Project findings 1 through 5 and the project location will be consistent with the San Diego County General Plan.
7. The requirements of the California Environmental Quality Act (CEQA) have been complied with.

The project is NOT consistent with the scale of the surrounding dedicated open space including protected wetlands, existing two story single-family dwellings or the fire station across the street and beyond the western open space. Including 5 large scale buildings and a use that is proposing to operate seven days a week from 8 a.m. to 10 p.m. is a SIGNIFICANT impact on the surrounding community. It is unlawful and completely disregarding the neighboring land owners to allow this project to operate 7 days a week until 10 p.m. at night. THIS IS EXTREMELY HARMFUL AND UNDESIRABLE AND WILL SIGNIFICANTLY IMPACT OUR NEIGHBORHOOD CHARACTER. The proposed project is not suitable for the site given the intense density and intensity of use operating until 10 p.m. at night. In addition, the project will generate significant traffic on the small dead end street of Four Gee Road and can easily impede the fire station ability to quickly respond to emergency calls. The project does NOT meet the required findings to approve a MUP.

2.0 Compatibility Analysis

2.1 Physical Compatibility with Surrounding Area/Bulk and Scale/Height

As stated above, the subject site is NOT compatible with the immediately surrounding community as stated above and the Specific Plan Amendment and height exception should not be granted to implement a project that is not consistent with the SFVSP. The report includes analysis of industrial users in business parks are not remotely part of the same neighborhood to reach a compatibility of analysis—see Figure 11 which includes analysis of Jerome's Furniture, General Atomics, Maranatha Chapel, Northrup—all located within a distinct industrial and business park—not a semi-rural residential planning area that requires low-medium estate residential. This is a biased and undue analysis. The report should be revised to remove these industrial type uses and focus on the more comparable development in the immediate area.

To conclude the project would not have visual impact or that the site appears "visually isolated" is not technically sound or correct. On the contrary, the area as the property is very compatible with the surrounding community and is development exactly per the intent and requirements of the SFVSP with density being lower adjacent to the 4S Ranch development, protected open space to the north, to the west and surrounding the fire station, to the south and along and parallel to Camino del Sur. To say the area is

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O-4-30 This comment states the project is not consistent with the scale of surrounding buildings, and that the operational scale is harmful to the neighborhood. The comment is stating the commenter's general opposition to the project and does not identify any specific inadequacies with the technical analyses nor the DSEIR. For a discussion of the land use analysis, and operational hours, and a discussion of the density, please see General Response 1, "Planning and Land Use," of the Response to Comments. For a discussion of Findings, please see DSEIR Section 3.1.4.3.

O-4-31 This comment addresses traffic volumes and emergency response. Both of these items were addressed in the DSEIR. Existing traffic volumes were collected as part of the traffic report preparation and were included in Table 3.1-22. Forecasted traffic volumes were determined for the Existing + Project Scenario (Table 3.1-22 and 3.1-23), the Existing + Ambient + Cumulative Scenario (Table 3.1-30 and Table 3.1-31) and the General Plan Scenario (Table 3.1-32). All segments and intersections will operate at an acceptable level of service.

With regard to emergency response, please see Response O-4-8 above.

O-4-32 This comment states that the MUP findings cannot be made for the project. Chapter 2.0 of the Land Use and Planning Analysis (DSEIR Appendix O) shows that in light of existing conditions in the area, the project would meet all the required findings necessary for project approval when considering the surrounding uses. The project's ability to make necessary findings is also discussed in Section 3.1.4.3 of the DSEIR. These include a consideration of bulk and scale, density, coverage, land form alteration, design elements, and operations. This comment will be included in the Final SEIR package that will be made available to decision makers prior to their decision about the project.

- O-4-33** This comment addresses the physical compatibility of the project with regard to bulk, scale and height. Figure 6 on page 8 of the Land Use and Planning Analysis provides an overview of the existing zoning within one mile of the project site. The one-mile project area is a standard used by the County to assess land use compatibility. The commercial businesses identified in the comment are identified in Figure 11, page 32 of the report, to illustrate the array of large buildings and projects within the one-mile radius. Figure 11 and Section 2.1.3 of the report further identifies Del Norte High School and the residential properties with lower percentages of lot coverage compared to the project. The purpose of this analysis is to illustrate both the project's neighborhood compatibility at a one-mile scale as well as from a more focused approach. Both are important in providing a balanced view of the neighborhoods in which development is proposed. Additionally, see Response O-4-26, paragraph 2, above, for details about surrounding land uses. This comment will be included in the Final SEIR package that will be made available to decision makers prior to a final decision on the project.
- O-4-34** This comment makes the general statement that the existing use on the site is not visually isolated and is visually compatible with the community and is developed per the intent of the SFVSP. The DEIR executive summary states on page 1, that "[w]hen compared to predominant uses in the area the site exhibits visual discontinuity due to its low density, predominance of vegetation, and lack of a consistent design. It is evident that the surrounding area has grown up around this use." Please see General Response 4, in the Response to Comments for more details. For a detailed discussion of the project's consistency with the SFVSP, please see General Response 1 "Planning and Land Use."
- O-4-35** This comment asserts that stating the site is surrounded by development ignored the SFVSP. The DSEIR takes a balanced view of surrounding uses. It states in Section 2.1.2.3 that "[t]he Project site is surrounded by suburban development on the north, east, and south. The local area also encompasses some open space and undeveloped land." The DSEIR also considers the SFVSP in its analysis, which is provided in Section 3.1.4, Land Use and Planning. The comment provides opinions that do not raise any specific issues with the DSEIR and its analysis and no more specific response can be provided. For a response to the issue of spot zoning, please see Response O-4-27, above. All comments made in the 4SSFV letter will be included in the DSEIR package that will be made available to decision makers prior to their decision about the project.

O-4-36 This comment addresses the proposed audio system and bell. No permanent exterior audio system is proposed although temporary systems may be used from time to time for specific outdoor events. Noise from a specific outdoor audio system was not evaluated because the type of equipment to be used cannot be predicted at this time. The project will use the best technology available at the time, which could provide better sound control than is currently available. However, the DSEIR does acknowledge this as a project impact (DSEIR Section 2.5.5, page 2-113). It includes a mitigation measure to control the possibility of outdoor noise. The following mitigation measure shall be implemented as a condition of Project approval. It was amended to clarify the circumstances under which the measure would apply.

M-N-1 If any outdoor event is proposed that will involve the use of an audio system and that includes more than 500 people, or if the outdoor event will extend past 7 PM, the noise impacts of the specific event must include design features and mitigation measures to comply with the applicable regulation. Such measures would include, but are not limited to:

1. Locating events to maximize attenuation from intervening buildings and topography
2. Limiting the time of the event and cease all substantial noise generating activities by 10 PM.
3. Limiting the number of attendees not to exceed 500 people to minimize impacts to off-site receptors.
4. Associated outdoor audio equipment shall be directed away from the occupied neighbors. Audio equipment would be directed in designated areas, facing towards the center of the site and/or using intervening structures to screen and shield associated noise sources.
5. The audio system will be tested prior to an event and the systems will be adjusted so noise does not exceed County noise limits.

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surrounded by development to justify allowing this mega intense use is completely disregarding all the professional work, analysis and strategy planning that went into the SFVSP. To allow the proposed project would simply be completely disregarding the requirements, intent and integrity of the SFVSP and result in spot zoning to accommodate the proposed project. Why would the County even entertain this proposal? Approval of this project would be completely ignoring all the work and analysis that went into the SFVSP. It is not sound planning or equitable to the neighbors and the prior decision makers who approved the SFVSP.

In addition, no details of the audio and bell would also be a direct and continual impact to the surrounding, quiet residential uses. The bell and audio system should not be permitted as there is no real, practical way to monitor these and conditions of approval on paper don't allow weekly monitoring or regulating. Especially with the site being adjacent to biologically protected wetlands; this increase noise could impede breeding, foraging and use of this area. The approval of this development would also result in significant edge effects to this biologically protected wetland area: increase of human presence, noise, lighting, trash, fencing. Why allow these impacts when the site developed in accordance with the SFVSP and Zoning Ordinance these impacts would be eliminated. Approving this development compromises the integrity and long term viability of the biologically protected open space.

ACOUSTICAL ANALYSIS REPORT (April 13, 2017)

The acoustical analysis and DSEIR section 2.5 is lacking minimal information and therefore is inadequately assessing the noise impacts from outdoor events and the proposed church bell. The analysis does not include the outdoor audio or public address systems (see excerpt below). This basic information must be provided and properly assessed to accurately determine all impacts of the project.

Noise from Church Events

The acoustical study Section 3.2 Potential Operational Noise Impacts, Noise from Church Events, and Section 2.5 state the following:

"No formal activities or amplification are currently planned to take place outdoors, however, if any outdoor events are proposed to include more than 500 people or will extend after the hours of 7 p.m., the noise impacts of the specific event must be evaluated to determine design features and mitigation measures required to comply with the applicable noise regulations at that time. No audio or public address system was included in this analysis, as it is currently unknown if or where such a system would be implemented. According to the project applicant, if an outdoor audio system is to be used, the church would use updated sound equipment that directs sound to designated areas. The church would also have speakers face exterior buildings to help contain the sound in the areas around the buildings and would not exceed maximum sound levels at the property lines."

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O-4-36 Noise from the church bell is analyzed in Section 3.2.1 of the noise analysis (DSEIR Appendix J). The analysis concludes that for a conservative scenario, the noise from the proposed church bell can be rounded up to 65.0 dBA, which is more than a doubling of the sound power of the measured church bell. The nearest residential receiver is located approximately 300 feet from the proposed bell location. At this distance, if the bell were to ring for a period of 5 minutes out of an hour, the hourly average noise level is calculated to be 46.2 dBA. This would comply with the 50 dBA daytime noise limit at residential properties. Noise impacts for the church bell would be less than significant.

The project's potential impact to nesting birds was evaluated [in the biological resources analysis for the project. As noted on page 12 of the biological resources report (Klutz Biological Consulting 2016), the project will introduce noise to the project site due to project operations, however the project has been designed with a parking area to buffer the proposed uses from the offsite open space area. Also, due to the transient nature of noise generation by the project, noise impact would be less than significant.

O-4-37 This comment addresses edge effects. Please see Response O-4-7 above.

O-4-38 This comment addresses the noise analysis for outdoor events and the church bell. Please see Response O-4-35 above.

O-4-39 The comment cites the text of the acoustical report and states an audio system for the project must be identified. The County agrees that the text citation is correct. Please see Response O-4-35 for a discussion of the audio system.

O-4-40 This comment states that there is no enforcement mechanism for the proposed mitigation for the outdoor audio system. There are ample safeguards to ensure County requirements are met. This includes testing of the audio system and adjustment of same, the fact that the County can check on conformance, and that the MUP is subject to enforcement of operational limits. Since the audio limit will be written into the conditions, it will be subject to enforcement. Please see Response O-4-36 for details.

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The applicant must determine if and what kind of audio system would be part of the project. Until that happens, the analysis cannot be complete and appropriate mitigation measures cannot be developed. This project is lacking a complete and comprehensive project description and therefore adequate analysis.

Moreover, the proposed mitigation measure (provided below) is unacceptable or quantifiable. How will the mitigation measure realistically and practically be enforced? There is no real teeth or regulations that ensure or require the mitigation will be implemented. Is there a special event form or analysis that is required to be submitted by the applicant? There is no assurance of how or if this mitigation measure would ever be complied with.

In order to ensure noise from outdoor events remains in compliance with applicable noise regulations, a condition of approval should be implemented as follows: If any outdoor events are proposed to include more than 500 people, will involve the use of an outdoor audio system, or will extend after the hours of 7 p.m., the noise impacts of the specific event must be evaluated to determine design features and mitigation measures required to comply with the applicable noise regulations at that time.

M-N-1 If any outdoor events are proposed, the noise impacts of the specific event must include design features and mitigation measures to comply with the applicable noise regulations. Such measures would include, but are not limited to:

- Locating events to maximize attenuation from intervening buildings and topography
- Limiting the time of the event and cease all substantial noise generating activities by 10 PM.
- Limiting the number of attendees not to exceed 500 people to minimize impacts to off-site receptors.
- Associated outdoor audio equipment shall be directed away from the occupied neighbors. Audio equipment would be directed in designated areas, facing towards the center of the site and/or using intervening structures to screen and shield associated noise sources.

Sensitive receptors live to the north and east of the project site, and to not include this basic operational information is an incomplete and inadequate analysis. The audio system must be identified or the DSEIR and technical study remains deficient. The DSEIR and acoustical study must be revised and updated and the public must be given a chance to review the revised information.

Noise from Church Bell

The acoustical analysis and DSEIR section 2.5 indicate that the proposed Sanctuary building is anticipated to include a church bell. However, neither document includes the exact specifications and operation schedule of the bell. And, the assumptions in the acoustical study use a church bell in Escondido, California (see excerpt below). The noise assessment for the project used this church and church bell plays a melody every day at noon for approximately two minutes. Therefore, the noise assessment of the

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O-4-41 This comment provides proposed language regarding outdoor events. The County concurs with the substance of the comments. The required mitigation measure (cited in response O-4-36 above) embodies the restrictions stated in the comment.

O-4-42 This comment addresses the noise mitigation. The comment is the text of mitigation measure M-N-1. The measure has been modified in response to the above comments and the new text is provided in Response O-4-36 above and in the Final SEIR.

O-4-43 This comment addresses the noise analysis as it relates to the future audio system and sensitive receptors in the project vicinity. The noise mitigation has been modified to reflect testing of the audio system. Please see Response O-4-36.

O-4-44 This comment addresses the proposed church bell and the analysis assumptions made in the DSEIR. The County appreciates the comment. Please see Response O-4-36 paragraph 2, above. The acoustical report notes that measurement of bell noise from the church tower in Escondido was taken at 120 feet from the bell location (DSEIR Appendix J, Section 3.2, page 19). The nearest receiver for the project is 300 feet away. The DSEIR analysis also increased the potential bell noise, to 65 dBA, which is more than a doubling of the sound power of the measured church bell. The DSEIR therefore provides a conservative analysis of church bell noise, and determined that the projected noise level would be 46.2 dBA if the bell rang for five minutes in a given hour. This is below the County's daytime noise standard for residential properties of 50 dBA. Due to this conservative approach, the acoustical analysis is an adequate description of the noise the bell would generate.

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church bell is based on complete unknowns and is not substantiated on how the proposed project actually intends to use the bell. Again, an adequate and complete environmental analysis can NOT be done until the applicant identifies exactly how often, for how long and at what specific times the bell will be used.

To use a random church in Escondido with ASSUMPTIONS of times and duration is completely arbitrary and provides no ground for sound, technical analysis. There is no information in either SDEIR or noise study to state if the sites are similar or how they are similar. There are so many varying factors that affect noise and assessing potential impacts such as the type of bell, the same size of bell, similar type of noise generated by the bell, topography of the site, construction type/building materials (i.e. noise attenuation measures in the building), type and number of windows, sound walls, hours and days of operation. To use a random church that simply has a bell and assume a 5 minute duration only during day time hours is a fatal flaw in the suggested analysis.

The subject site may plan to ring the bell numerous times a day (even if only during day time hours) and for an extended period of time. This BASIC information must be provided and the acoustical study and DSEIR section must be revised to ensure ALL potential impacts are identified and mitigated for. To omit basic operational noise (in a tower that is exceeding the height requirements) is not in compliance with CEQA. It would be a nuisance to have a church bell ring numerous times a day for several minutes long given the adjacent sensitive receptors.

Visual Resources Impact Report and Addendum (May 2016)

The visual study and addendum conclude that visual pattern would change but would not be visually adverse. The analysis weighs more heavily on land uses that are farther away from the site than the actual land adjacent to the site.

Residents

The technical report identifies the sensitive receptors but fails to assess the view impacts from the closest residences. The keyview points as identified in Figure 2.1-2 to the east and adjacent to the site (Rosemary Lane) are taken at the ends of the site where homes are farther away from the proposed development as opposed to the homes in the center of the site which are closer to the development (see keyview points 1 and 8 on Figure 2.1-2). The keyview point should have been at the end of the cul-de-sac where the homes would be most significantly impacted. The report needs to be updated to properly and adequately assess the potential impact of the closest sensitive receptors.

The report states the site "would shift from one of a sparsely developed site with semi-rural features to one of a fully developed site with positive visual amenities consistent with the existing community." The proposed development is NOT consistent with the surrounding community. The site is surrounded by open space to the north, the northeast, west and northwest. Not only open space but biologically sensitive open space that will NEVER be developed. The building height is not compatible with the residential uses surrounding the site. The tower element of the fire station is only ONE structure and is

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O-4-45 The comment state that the use of church bell data from a church in Escondido is arbitrary and is not grounds for a sound technical analysis. The analysis uses the best data available when it was written. Because no bell has been selected for the project, it was necessary to provide best available information. To allow for drawbacks such as those noted in the comment, a more than doubling of the tested church bell noise was used for the analysis. Please see Response O-4-44 for more details.

O-4-46 This comment states the ringing schedule for the ringing of the church bell should be stated. For a response to the issue of bell noise, please see Responses O-4-36 and O-4-44 above.

O-4-47 The comment states the visual report relies more heavily on uses that are far away. The visual analysis (DSEIR Appendix C) provides analysis of both near and more distant uses. Eight of the photo simulations analyze near-by effects, and two photo simulations evaluate more distant uses. This focus is appropriate because sensitive receptors are near the project site. No changes to the DSEIR are needed as a result of the comment. This comment is included in the Final SEIR for review and consideration by the decision-makers prior to a final decision on the project.

O-4-48 The comment states the visual report does not analyze visual effects from the closest residences. Four visual photo simulations (key views) were taken from the south. Key View 1 pictures the site from the southeast, while Key Views 2 and 3 picture the site from the center and left of center positions. Key View 4 pictures the site from the southwest. Two key views picture the site from the east: Key View 1 and Key View 8. These representations include views from the residences closest to the site, which are along Tallus Glen and Wild Horse Glen. The views present an accurate overall representation of visual resources at these locations. They were used to determine that views from the east (depicted in Key View 8) are significantly impacted by the project (DSEIR Appendix C, page 48) while Key Views from the south are not significantly impacted (Appendix C, page 44+). Mitigation measures to provide early screening of the site include were incorporated into the DEIR. These are M-VIS-1, which calls for screening of the retaining wall to the north. M-VIS-2 and M-VIS-3 call for installation of larger than called for trees and shrubs early in the project construction process to provide early screening of the site. Design features include a high quality Mediterranean/Tuscan architectural style, an extensive landscape plan, quality entry monumentation, screening of roof equipment, as well as limitations on lighting and signage. Please see DSEIR Sections 2.1.6, page 2-35, for mitigation text, and 7.2.1, page 7-6, for design measures. No changes to the DSEIR are needed as a result of the comment.

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not the majority of the visual character of the community and is a civil use that serves the entire community.

The report goes on to state *"The site as a whole seems visually out of place due to the contrast with existing uses. These other uses, whether residential, public service, or commercial, present a unified visual impression of having been planned, with all visual elements coordinated through architecture and landscaping. The onsite uses of the site exhibit few coordinated elements. The site is "rough" in contrast to the visual elements around it and continuity is low."*

The SFVSP strategically and comprehensively allocated land uses and densities based on, in part, the preservation and interface of open space and appropriate distribution of density given the higher density in 4S Ranch Specific Plan. The proposed project does not implement the intent, vision and goals of the SFVSP. Hence, the need for a Specific Plan Amendment, height exception and extensive mitigation measures. It is more aligned with spot zoning and undermines the comprehensive analysis and approach developed by the SFVSP. The proposed site use is too intense for a site that was purposefully and previously analyzed for low-medium density residential and a General Plan category of semi-rural. Amending the Specific Plan doesn't make the project consistent; on the contrary it demonstrates how the project is NOT consistent with the Specific Plan.

The conclusions for determining significance in CHAPTER 5.0 VISUAL IMPACT ASSESSMENT are not correct. The project is not consistent with the intent, vision, goals, policies or objectives of the SFVSP.

The Project does introduce features that would:

1. Detract from or contrast with the existing visual character and/or quality of a neighborhood, community, or localized area by conflicting with important visual elements or the quality of the area (such as theme, style, setbacks, density, size, massing, coverage, scale, color, architecture, building materials, etc.) or by being inconsistent with applicable design guidelines.
2. Not comply with applicable goals, policies or requirements of an applicable County Community Plan, Subregional Plan, or Historic District's Zoning.

The project is not consistent with the SFVSP or the zoning ordinance in terms of use, community design, and visual quality. Approving this project would compromise the visual quality, character and integrity of the surrounding existing community.

The visual study also states "Buildings and fencing would be in scale with the community character of the area as defined by the SPA. A height exception is requested that would allow portions of Building B and three towers to exceed height limits." If an exception is required the project is inherently NOT consistent with the SFVSP—it can't be consistent and require a deviation to development standards within the Zoning Ordinance. The

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O-4-49 The comment states the proposed development is not consistent with the surrounding community, citing nearby open space and tower heights. Open space areas will not be developed as a result of the project and therefore the open space will remain as a visual amenity.

The land use analysis evaluated building heights in the vicinity and found that tall building elements are not uncommon. The 53 foot high fire training tower is noted in the comment. The apartment building immediately to the southeast is 40 feet in height, the height requested for one building in the project. Other buildings will be under 35 feet, similar to building in the Black Mountain Ranch North Village to the southwest. The County acknowledges that the proposed buildings will be taller than single family residences in the area. Building heights from the site will appear shorter from the south because they will constructed at approximately 5 to 10 feet below grade. So a 35 foot building will have an apparent height of 25 feet from this perspective. Buildings will appear shorter from the east because those homes are built at an elevation 20 feet higher than the site. The altered angle of the view, as show in Key View 8, prevents most of the buildings from rising above the current horizon line. And they will be lower than the apparent height of the apartments to the south. All comments made in the 4SSFV letter will be included in the DSEIR package that will be made available to decision makers prior to their decision about the project. No changes to the DSEIR are required as a result of the comment.

O-4-50 The comment quotes a passage from the visual report, Section 2.1.2.3, page 2-7. The County agrees that the passage is accurately quoted.

O-4-51 The comment states the SFVSP allocated land uses based in part on the interfaces of open space and appropriate distribution of density and that the project does not implement the intent, vision, and goals of the SFVSP. The project preserves and protects the open space to the north and west of the site, with the exception of a small area for the project entry on the west. It is consistent in this respect with prior planned uses. Land use issues with respect to the SFVSP are addressed in Responses O-4-24, -25 above. While the site was designated as low density residential in the SFVSP, the proposal of an alternate use was always permissible with the appropriate documentation and discretionary action. For a discussion of spot zoning, please see Response O-4-27 above. All comments made in the 4SSFV letter will be included in the DSEIR package that will be made available to decision makers prior to their decision about the project.

- O-4-52** The comment states the proposed use is too intense for the site and not consistent with the SFVSP. Land use issues with respect to the SFVSP are addressed in Responses O-4-24, -25 above. The determination of consistency with the SFVSP was made after extensive analysis of land use (DSEIR Appendix O). It includes a detailed inventory of the existing uses in the area, which includes both multi- and single-family residential uses, open space, commercial, and civic uses. The analysis determined the project is consistent with density and intensity of surrounding uses as they have evolved since the SFVSP was adopted.
- O-4-53** The comment states the conclusions of the visual analysis are not correct and that the project is not consistent with the SFVSP. The comment is general in nature so a specific response is not possible. Specifics of the visual analysis are discussed in Response O-4-54 below and consistency with the SFVSP is addressed in Responses O-4-24 and O-4-25 above.
- O-4-54** The comment concerns visual character and quality of the neighborhood. The theme of the community is one of high quality and mixed use in a basically suburban setting. The proposed use, a church, is a common theme element in suburban settings. Style can be characterized by a commitment to an architectural design or detailed and consistent landscaping elements. The project incorporates high quality architectural elements that are found in the community. The landscape plan is extensive and provides a unifying style for the project. Setbacks are employed in all directions to protect views, biology, and reduce noise. Density, size, massing, coverage, and scale are analyzed in detail in the DSEIR, Section 3.1.4 and it was determined that the project was consistent with the land use and community with respect to these elements. The EIR and land use report (Appendix O, Chapter 2) also determined that, in light of the evidence provided, required findings for bulk, scale, and other issues required by the Zoning Ordinance (ZO), Section 7358 can be made.
- O-4-55** The comment questions consistency with the community plan, SFVSP, Historic District Zoning, as well as visual effects on the community. The County appreciates the comment. Please see Response O-4-24, and -25 for a discussion of the project's consistency with the community plan and the SFVSP. A specific reason for citing the "Historic District Zoning" is not provided in the comment so a specific response is not possible. For a discussion of visual quality please see Responses O-4-25,-47,-48, and -54 above. Community character is discussed in Responses O-4-24,-25, and -64.

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analysis is using the exception as a rationale for consistency with the SFVCP and visual character, which is intrinsically inconsistent. A deviation means the project is NOT comply with applicable goals, policies or requirements of an applicable County Community Plan, Subregional Plan, community plan and zoning code.

In addition, as stated in section, 2.2.4 County Zoning Ordinance, states "*The property is zoned Specific Plan (S88). The site carries a "G" height designator, which allows buildings to be a maximum of 35 feet and two stories. The project proposes an exception to this regulation to allow for a sanctuary building of 40 feet, two towers of 48 feet, and one tower of 53 feet.*"

The project should be required to comply with the height requirements of the 40 feet. The height exception is for the bell tower, which should be removed from the project. The noise generated by the bell is a nuisance and impact to the existing quiet community and a deviation to the development standards should not be granted to accommodate this nuisance.

Walls/Fences

Project does NOT comply with the SFVSP as it is proposing vinyl coated chain link fencing that is not identified or consistent with the community design described in the SFVSP or the existing single family residential communities.

Furthermore, the introduction of a fence adjacent to the biologically protected wetland area adjacent and to the north of the site will prohibit movement of animals in this area. There are numerous wildlife species that live in this area and their movement will be severely limited with the fence. The fence will impede the wildlife corridor that is protected in perpetuity.

A vinyl coated fence and landscaping will not adequately mitigate the view, noise or lighting impacts on the existing residences. For the DSEIR and visual study to conclude there are no visual impacts is subjective and simply not accurate. Vinyl coated chain link fence is NOT visually compatible or consistent with the existing community design goals, objectives and policies identified in the SFVSP (Chapter 7), nor is it consistent with the existing fencing in the adjacent residential area. Chain link fence is not recommended or identified in the SFVSP Chapter 7, specifically 7.2 Community Design Plan which states "promote a cohesive community design theme..., a visually unified and attractive community that preserves and enhances the natural resources, and maintains the unique visual features of this area"

Nor does a vinyl coated chain link fence implement the following component required by the SFVSP:

- Design parameters to establish a degree of project consistency and high quality of design among the multiple ownerships including streetscapes, gateways, architectural and landscape design of specified typed of development.

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O-4-56
Cont.

O-4-57

O-4-58

O-4-59

O-4-60

O-4-61

O-4-62

O-4-56 The comment asserts that granting the height exception request would make the project incompatible with the SFVSP, Subregional Plan, and zoning ordinance. The exception request is intended to allow the project to use design characteristics that occur frequently in the area. These include the fire tower located 500 feet from the site to the west (53 feet in height). The Reserve at 4S Ranch apartments at 500 feet from the site reaches a height of 40 feet. The Black Mountain Ranch North Village, is located approximately 680 feet from the site. Del Norte High School with a maximum height of 57 feet and the Design39 School with a maximum of 52 feet, are within 1000 feet of the site. Please see Table 1 of the *Land Use & Planning Analysis for the Chinese Bible Church* (Appendix O) for additional details. Additionally, the perceived height of buildings will be diminished from the south because the buildings will be built approximately 10 feet below grade. This will also diminish apparent height from the east because buildings not appear to break the horizon line except at the center of the site. The exception will allow the project to present architectural features that add interest and diminish bulk and uniformity and thereby preserve conformity with the SFVSP and Community Plan. For a discussion of general consistency with the community plan and SFVSP please see Responses O-4-24, and -25 and Section 3.1.4.3 starting on page 3-70 of the DSEIR.

O-4-57 The comment correctly cites a section of the DSEIR. No response is required as a result of the comment.

O-4-58 The comment states the project should be required to comply with the height requirements of 40 feet and should remove the bell tower. It also asserts the noise generated by the bell is a nuisance. The County acknowledges the comment. The height waiver is discussed in detail in Responses O-4-29, and -57 above. For a discussion of the bell tower noise, please see Response O-4-36 above. No changes to the DSEIR are required as a result of the comment.

O-4-59 The comment states the vinyl fencing proposed by the project is not consistent with the SFVSP. The project proposes replacing the existing chain link and vinyl white panel fencing with a mix of wrought iron and vinyl coated chain link fencing. The DSEIR determined that the vinyl fence would not be a visual impact with the adoption of project design measures. These are the use of earth-toned vinyl, and extensive landscaping on both sides of the fence to screen it from view. The reader is directed to the concept landscape plan for the project for details about the plant palette and placement. The DSEIR includes graphics of the concept plan as Figures 1-7 through 1-9.

O-4-60 The comment asserts the project's retaining wall will inhibit wildlife movement.

The biology report for the project, DSEIR Appendix E, analyzed the wildlife corridor. It states on page 11+ :

Dense residential development occurs to the east north, and south of the project site. The San Dieguito River ends approximately 400 feet to the northeast resulting in the eastern terminus of this branch of the river. No evidence of large mammal use was found on the site. Due to the narrow width of the San Dieguito River within the project vicinity and adjacent development, the project site is not suitable as a wildlife corridor for large mammals. Therefore, impacts to wildlife corridors would be less than significant.

The biological open space north of the site runs in a generally east to west pattern. This pattern will not be disrupted by the project, which leaves the northern open space intact. No changes to the DSEIR are required as a result of the comment.

O-4-61 The comment asserts that vinyl fencing is incompatible with the SFVSP. For a discussion of the vinyl fencing, please see Response O-4-59 above.

O-4-62 The comment questions the consistency of vinyl fencing and design measures with the SFVSP. Please see Response O-4-59 for a discussion of vinyl fencing and other fencing designs used by the project. The visual assessment appropriately considered the extensive measures proposed to reduce visual effects in conjunction with visual mitigation measures. Design features include the architectural design, the placement of buildings, use of courtyards to reduce mass, building setback in all directions to reduce the apparent mass of buildings, preservation of open space, and varied, high quality architectural elements such as pavers, wrought iron fences, and trellises. Design features also include the use of muted colors to help the buildings and paved or graveled areas to blend with their surroundings. Design features also include the Concept Landscape Plan, which specifies plantings in multiple "layers" in each direction, which will provide multiple screenings of uses while retaining visual depth into the site. Visual mitigation measures are proposed where additional or faster visual screening is needed. VIS-1 (DSEIR Section 2.1.6, page 2-35+) provides for structural or planting solutions to the long retaining wall being proposed.

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- Design parameters to address visual compatibility with adjoining residential communities....”

Section 7.4 Community Design Guidelines:

- The Community Design Guidelines are intended to promote the creation of a visually unified and attractive community that protects, preserves, maintains and enhances the natural resources, beauty, quality of life and community character of the Santa Fe Valley SPA.
- Walls/Fences—Walls should be limited to those needed for screening of unsightly equipment or uses or for excessive noise mitigation. The monotonous, horizontal form of continuous walls should be relieved by landscape planting, pilasters or plan offsets. None of the “typical” walls identified in Figures 7-6 include chain link or vinyl coated chain link. Chain link is not visually pleasing or consistent with the high visual character of surrounding residential developments.

Neighborhood residents strongly oppose the use of chain link fence as it not recommended or allowed in the SFVSP, it clearly does not improve the visual quality of the neighborhood, and is not a high quality design material. A fence that is more compatible with the adjacent community is requested and should replace all vinyl coated fencing.

DSEIR:

The fact that Land Use was not part of Chapter 2 is a fatal flaw and minimizing one of the most important issue areas. The project is requesting discretionary land use applications to allow non-permitted uses, a major use permit and height deviations. These are all land use issues and to place this issue area in Chapter 3 is a defect and makes the DSEIR inaccurate and flawed.

CHAPTER 2, AESTHETICS

The rear yards of approximately 15 houses adjacent to the Project site have views into the site. The ground view from these residences looks past wrought iron fencing and a landscaped embankment into the Project site. The second stories have an unobstructed view into the Project site.

In this section, Pattern Character “Within the Project site there is little diversity due to the trees that diminish the visibility of other uses. There is some continuity along the northern boundary where fields blend with existing open space; however, the site as a whole seems visually out of place due to the contrast with existing uses, which present a unified visual impression of having been planned, with all visual elements coordinated through architecture and landscaping. The on-site uses of the Project site exhibit few coordinated elements. The site is rough in contrast to the visual elements around it and continuity is low.

The interplay of pattern elements and pattern character at the Project site initially create the visual sense of a rural setting; however, the small scale of the site, the dominance of

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O-4-63

O-4-63 The comment cites the SFVSP as requiring design parameters to address visual compatibility with the community. High quality and extensive design measures have been used to achieve compatibility with the community. Please see Response O-4-62 above.

O-4-64

O-4-64 The comment questions the consistency of the project with the Community Design Guidelines, with a focus on walls and fences. The extensive design measures used to conform to the high quality visual character of the area are discussed in Responses O-6-54 and -62 above. The long horizontals of the project created by retaining walls, was called out as a significant project impact (DSEIR Section 2.1.3.4, Impact VIS-4a, page 2-29). The project mitigates this impact by requiring design modifications to the wall and landscaping to break up long horizontals created by the wall (DSEIR Section 2.1.6, M-VIS-1, page 2-35).

O-4-65

O-4-65 The comment notes strong community opposition to the proposed vinyl coated chain link fence. The comment is noted. For a discussion of the vinyl coated chain link fence, please see Response O-4-62 above. All comments made in the 4SSFV letter will be included in the DSEIR package that will be made available to decision makers prior to their decision about the project.

O-4-66

O-4-66 The comment states that the land use study should have determined that project effects are significant, requiring a move to Chapter 2 of the DSEIR. The comment is general in nature so a detailed response is not possible. Land use was analyzed in the DSEIR, in Section 3.1.4 starting on page 3-63. The extent of the land use analysis is also discussed in Response O-4-3 above.

O-4-67

O-4-67 The comment paraphrases or cites sections of the visual study. No questions are raised in the comment and no response is required.

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the trees and their unmaintained nature and the lack of extensive open land around the grove work against this image. The surrounding suburban setting that dominates the region further diminishes this effect. As a consequence the Project site appears visually isolated."

However, there are ample reasons to disagree as the subject site blends very well with the adjacent open space immediately to the north, the open space and low density and scale of the fire station across the street to the west and the existing single family residential development to the east and north. The other development being compared to the subject site that is more intense is separated from the subject site by major arterial roadways that divide the community and are other neighborhoods so the analysis is not a fair or proper comparison. Moreover, the land is developed in COMPLIANCE with the SFVSP and if the subject site would develop in conformance with the SFVSP, it would be visually and aesthetically consistent. To allow the proposed mega project would cause a visual inconsistency and incompatible land use that was NEVER intended or allowed by the comprehensive land use allocation of the Specific Plan as was stated by one of the planners, Lois Jones at a SDCPG meeting several years ago..

Section, 2.1.2.6 Key Viewpoints, states

"The selected key views from public viewpoints were identified based on the number and frequency of views, the potential sensitivity of viewers, and the types of Project-related features that would be visible. These locations were selected where viewer sensitivity, exposure, or awareness was high or moderate and include the residential areas immediately surrounding the Project site, the streets that border the Project site on the north, south, and west, sidewalks and trails, and public areas where activities were focused in such a way as to afford prolonged or vivid views of the Project site. Ten key views were selected to analyze potential impacts to visual resources. Figure 2.1-2, Key View Index, identifies the perspective and location of each view. Existing perspectives at each key view are illustrated in Figures 2.1-3 through 2.1-12."

However, as stated above, the home on Silver Crest Lane that is closest to the subject site and has the most potential to be impacted did not have a keyview point and was not assessed. As identified in Figure 2.1-2, the keyview points were taken at the northeast and southeast corners of the site where homes are farther away from the proposed development. The assessment should have a keyview point at the home at the end of the cul-de-sac on Silver Crest Lane. The visual impact assessment is inadequate and not complete and should be revised to include this key view point of this home that will be greatly impacted.

This section concludes the project would not have visual impacts to the community or neighborhood and states:

"In summary, the Project generally conforms to the applicable regulations of the County of San Diego GP and San Dieguito Community Plan; however, the Project would conflict with the SFVSP. Mitigation is required to reduce impacts."

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O-4-67
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O-4-68

O-4-69

O-4-70

O-4-71

O-4-72

O-4-73

O-4-68 The comment states that the existing uses on the site blend well with surrounding uses. The visual analysis for the project concluded that the existing uses, while not incompatible with surrounding uses, does provide a contrast to existing uses as they have evolved in the area. For a discussion of the site's relationship to existing uses, please see Response O-4-34 above.

O-4-69 The comment states that uses to which the project is being compared are separated from the project site by a roadway and are separate neighborhoods. The land use study for the project appropriately examined uses adjacent to and nearby the project site up to a mile away. This provides an overall view of the area. Please see Responses O-4-20,-21, and -24 for additional discussions. Additionally, General Response 1 "Planning and Land Use" of the Response to Comments covers this topic.

O-4-70 The comment states the project is inconsistent with and incompatible with the SFVSP. The land use study (DSEIR Appendix O, Section 4.3) includes a discussion of the project's consistency with the SFVSP. A conformance discussion is also provided in the DSEIR, Section 3.1.4.3 of the DSEIR, page 3-70+. The DSEIR analysis concluded that the project is consistent with the land use and community characteristics of the area. All comments made in the 4SSFV letter will be included in the DSEIR package that will be made available to decision makers prior to their decision about the project.

O-4-71 The comment cites text from the visual report. No issues are raised, so a response is not necessary.

O-4-72 The comment states that views from houses closest to the project on Silver Crest Lane were not evaluated. Key View 8 of the DSEIR pictures views from houses along Silver Crest Lane. The view was taken from a more northerly point along the hill to capture the full extent of the proposed use in the simulation. The photo for Key View 8 is from the hill at the base of the backyard and was taken outside the backyards of the residents so as not to trespass. Views from second stories were not taken but were assumed to be significant. The analysis of this key view determined that impacts to the views were significant and in need of early screening. Please see the DSEIR, Impact VIS-2a, page 2-19. Please see Response 48 above for the text of mitigation measure MM-VIS-2 and MM-VIS-3, which are proposed to reduce impacts to below a level of significance.

O-4-73 The comment cites text from the visual report. No issues are raised, so a response is not necessary.

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However, the mitigation placed on the project has NOTHING to do with or to mitigate land use, intensity, density or visual quality of the site. The only mitigation for this issue area has to do with the proposed wall and landscaping.

M-VIS-1 To screen the retaining wall along the northern site boundary, the Project shall:

- Paint or clad the wall with a non-reflective earth-toned material that is matched in color to the surrounding and planned vegetation along the wall.
- Incorporate vertical elements from the base of the wall to break the horizontals of the wall. These elements can be constructed elements or vegetation. Constructed elements shall be of a type and quality that complements the existing design. Vegetation elements shall be able to attain a height that would reach the top of the fence along the wall so as to integrate these two structures.

It should be pointed out that the SFVSP generally rejects the use of retaining walls in lieu of gradual and gentle transitions of slopes and requires protection of flood plain and watercourses (p 2-9), "Provide protection from loss of life and property from flooding while preserving all floodplains and watercourses in their natural estate. Utilize the linear geographic qualities provided by floodplains as locales for green belts, open space corridors, community footpaths, and parkland.

M-VIS-2 Install 36" boxed citrus, 10 gallon shrubs, and 10 gallon vines at the earliest possible point during Project construction. At corners of the eastern boundary, the proposed California peppers shall be 48" box size. Along the eastfacing sidewalk, the proposed crepe myrtle shall be 48" box size. For Impacts VIS-2a, VIS-2b, VIS-3b, and VIS-4b

M-VIS-3 Install 48" trees and 10 gallon shrubs along the decorative fence line.

To conclude "the project will not result in a reduced or poor visual quality or character" is not accurate or consistent with the goals, policies and objectives which identified (and planned) this parcel as low-medium rural residential with a 1 – 1.9 acre minimum lot size—not a mega project.

CHAPTER 4, ALTERNATIVE

4.1.1 Alternatives Considered But Rejected from Further Study, states, in part, "It provides 9.09 acres, adequate room to accommodate buildings, parking, and access without disturbing biological resources." The project does in fact impact biological resources as identified in the biological technical report and as stated in Section 2.2.6 Mitigation (M-BI-1 and M-BI-2).

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O-4-74

O-4-74 The comment asserts that visual mitigation placed on the project has nothing to do with land use, intensity, density, or visual quality. The DSEIR analyzes the project in light of its design features and proposes mitigation when these features are not adequate to fully mitigate an environmental impact. The visual assessment appropriately considered the extensive measures proposed to reduce visual effects in conjunction with visual mitigation measures. Design features include the architectural design, the placement of buildings, use of courtyards to reduce mass, building setback in all directions to reduce the apparent mass of buildings, preservation of open space, and varied, high quality architectural elements such as pavers, wrought iron fences, and trellises. Design features also include the use of muted colors to help the buildings and paved or graveled areas to blend with their surroundings. Design features also include the Concept Landscape Plan, which specifies plantings in multiple "layers" in each direction, which will provide multiple screenings of uses while retaining visual depth into the site. Visual mitigation measures are proposed where additional or faster visual screening is needed. VIS-1 (DSEIR Section 2.1.6, page 2-35+) provides for structural or planting solutions to the long retaining wall being proposed. VIS-2 and VIS-3 call for plantings of larger vegetation "boxes" to speed screening of construction and early phases of the project. The project's mitigation for visual effects, taken together with design features, provide adequate measures to reduce impacts to below a level of significance.

O-4-75

O-4-75 The comment relates to the use of retaining walls by the project, specifically that the SFVSP generally rejects their use. Retaining walls are used by the project to achieve important design features that have land use and visual benefits. Retaining walls are used to attain project consistency with surrounding areas in addition to their structural use. The northern retaining wall is used in part to prevent impacts to open space adjacent to the site. The retaining wall in this position will make entry into open space more difficult, thereby discouraging trespass into this sensitive area. The retaining wall on the south will allow the project buildings to be sited approximately 10 feet below grade.

O-4-76

O-4-77

O-4-76 The comment cites text from the visual report. No issues are raised, so a response is not necessary.

O-4-78

O-4-77 The comment presents a closing remark that the project will result in poor visual quality and character. For a discussion of visual quality, please see Responses O-4-20,-21,-24, and -75. No changes to the DSEIR are required as a result of the comment.

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The alternative analysis is inadequate, incomplete and do not have technical analysis to support the determinations. Furthermore, land use and traffic were not included in the alternatives assessment, rendering an incomplete thorough analysis. This section must be revised to include these two issue areas which both have technical studies included as appendices to the DSEIR, and technical data, studies and analysis to support the unsubstantiated impact assessment of the alternatives.

The Specific Plan-Designated Land Use Alternative should be built as it is the environmentally superior alternative and it is the ONLY alternative that is consistent with the General Plan and the SFVSP and would have the least number of impacts.

There are other sites that the applicant could develop this project. At a minimum the reduced development footprint alternative should be required as it would reduce impacts to biological resources.

To summarize, the CBC campus project DSEIR is inadequate in that it has many deficiencies and fails to provide sufficient information to evaluate the impacts of the project, ignores policies and objectives of the County General, Plan and the Santa Fe Valley Specific Plan, generally accepted good planning practices, puts biologically sensitive open space at risk and changes the character of the neighborhood in our planning sub-area. The project is simply too intense a use for this location and requires numerous waivers and modifications to plans and zoning that show its clear incompatibility for the site.

Thank you for considering our concerns. You may address any questions to Dr. Kent, who is acting as spokesman for the MPAC at jerrykent@cox.net.

O-4-79

O-4-80

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O-4-83

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O-4-78 The comment notes that a description of the proposed project in Section 4.1.1 of the DSEIR is in error. The County concurs with the comment. The statement in Section 4.1.1, page 4-3 is hereby modified (with underline representing additional and ~~strikeout~~ representing deletions) to read:

In addition, no alternative location is proposed because this site presents special features that make it the best choice for a project of this kind. It provides 9.09 acres, and adequate room to accommodate buildings, parking, and access with minimal impacts to without disturbing biological resources. It is lower than surrounding uses, making it less intrusive. And infrastructure is already available to the site.

This modifications does not change any conclusions in the DSEIR because the change is minor in nature and the project's impacts to biology are extensively analyzed elsewhere in the DSEIR.

O-4-79 The comment states the alternative analysis is inadequate, incomplete, and have no technical component. The comment is acknowledged, but because no specifics are cited, a detailed response is not possible.

O-4-80 The comment states that land use and traffic were not included in the alternatives discussion, rendering them incomplete. The primary purpose of the alternatives is to present feasible alternate approaches that reduce environmental impact. The project was analyzed for land use and traffic impacts, and, with the adoption of design measures, it was determined that these impacts were less than significant. Their inclusion would not then provide additional insight into how significant impacts can be reduced by the alternatives.

O-4-81 The comment states the Specific Plan-Designated Land Use Alternative (SPDLU) should be built and that it is the only alternative that meets the GP and SFVSP plans and has the fewest impacts. The comment is acknowledged. The SPDLU calls for using the site for up to four residential lots, as currently designated by the SP. The No Project Alternative (NPA) has fewer impacts than the SPDLU and is consistent with the GP and the SFVSP. Neither the NPA nor the SPDLU meet the project objectives because no church would be built. Please see the DSEIR, Section 4.2.3, page 4-5, and Section 4.3.3, page 4-8 for a discussion of project objectives. All comments in and responses to the 4SSFV will be included in the DSEIR that is provided to decision makers prior to their decision about the project.

O-4-82 The comment states there are other sites for the project and that at a minimum the Reduced Development Footprint Alternative should be chosen over the proposed project. Chapter 4.0, Section 4.1.1 details why alternative sites were not discussed in the DSEIR. These generally related to limited choices in the region, limitations of sites that are available, and the similarity of infrastructure impacts likely to occur. The comment about the reduced footprint alternative is noted.

O-4-83 The comment asserts as a summation that there are many deficiencies in the DSEIR, that it fails to address impacts, ignores policies and objectives of General Plan and SFVSP, good planning practices, puts biological resources at risk, and changes the character of the neighborhood. The County acknowledges the comment. All comments in and responses to the 4SSFV letter will be included in the DSEIR that is provided to decision makers prior to their decision about the project. The foregoing responses have supported the completeness of information provided in the DSEIR. Completeness of mitigation measures has been addressed in Responses O-4-36 and -48. Conformance with the GP and SFVSP has been illustrated, for example in General Response 1 of Response to Comments, as well as in Responses O-4-21,-22,-24 and -25. The quality of planning used to prepare the DSEIR is addressed in Response O-4-33 and is reflected in the depth and accuracy of information included in this letter. Biological preservation has been discussed in Responses O-4-7,-13,-15,-22,-28,-36 and -60 among others. Community character has been discussed for example in Responses O-4-24, -25 and -64, among others. The overall discussion has shown that the DSEIR is complete and accurate.

The comment also notes the project is too intense for the location and that it requests waivers. The density of the site in relation to the community has been discussed in comments O-4-6,-20,-21,-51 and -52, among others. A General Response is also provided in the Response to Comments, General Response 1. The discussion concluded the project density is compatible with the existing community as a whole. The project has prepared a specific plan amendment to allow the church use in lieu of the designated low density residential use designation of the adopted SFVSP, in conformance with County regulations. The project requests a single exception to existing zoning for the project to allow towers that will add visual interest and raise the quality of the constructed setting. The last paragraph of the letter concerns contact information for Mr. Kent and does not raise an environmental issue.