

# 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 Manger  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123

**Subj:** Comments to DSEIR

**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

Dear Ms. Smith:

I am writing in response to the request for comments during the public comment period regarding the DSEIR for the referenced CBC campus project. I am the spokesman for the MPAC and a resident of the Savenna development whose only access is via Four Gee Road. The CBC site is completely visible from my property. This letter and others are in addition to a response being drafted by Coast Law Group, the attorneys for the MPAC.

The DSEIR makes the claim that the project “would remain compatible with the community character of the surrounding neighborhood” and “approval of the project would not alter the community character of the project area.” Also mentioned is that all impacts have been mitigated and are no longer significant. I disagree with both of these assertions and provide the proofs for some of my objections in a PowerPoint briefing I plan to deliver to the San Dieguito Community Planning Group this coming Thursday. Had you planned on attending?

In summary, in the briefing I give quantitative proof of the project 's inability to harmonize with the existing scale, bulk, cover and density and numerous other arguments among which are the inconsistencies of the project with the General and Specific Plans that govern land use in the Santa Fe Valley. As a result, I do not believe that the findings can be made to grant the requested MUP.

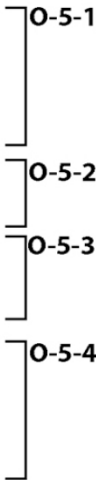
[jerrykent@cox.net](mailto:jerrykent@cox.net) • 858 829-3064

**O-5-1** The County of San Diego appreciates the comments on the Draft Supplemental Environmental Impact Report (SDEIR) by Mr. Gerald Kent on behalf of the 4S Santa Fe Valley Mega-Project Abatement Coalition. Detailed responses are provided below. Numbers here correspond to the numbered brackets that have been added to Mr. Kent’s letter. The Coast Law Group letter is included in these Response to Comments as letter B. No DSEIR issues are raised in the comment so no response is necessary.

**O-5-2** The comment summarizes conclusions from the DSEIR. No specific issues are raised in the comment and no response is necessary.

**O-5-3** The comment notes that Mr. Kent disagrees with conclusions in the DSEIR noted in comment O-5-2. The County acknowledges the comment. This comment letter will be combined with other comments made during the public review period for the DSEIR, along with the County’s responses. Comments and responses will be included in the DSEIR that is provided to decision makers prior to their making a decision about the project.

**O-5-4** The comment concerns Major Use Permit (MUP) findings and conformance with the General Plan (GP) and the Santa Fe Valley Specific Plan (SFVSP). The land use report (DSEIR Appendix O) was prepared to analyze the land use compatibility of the proposed Chinese Bible Church and includes a discussion of findings and conformance with the GP and SFVSP. The basis for the analysis was an analysis of land uses in the immediate area as well as nearby uses. Chapter 1.0 includes a detailed inventory of uses, and maps in the study show the proximity or residential areas. Photographs 1-3, for example, picture uses immediately adjacent to the site. Consideration of a wider area is appropriate in providing a complete picture of the uses as they have evolved since the SFVSP was first written. Table 1, Summary of Surrounding Land Uses, includes the uses immediately adjacent to the site as well as those nearby. The compatibility analysis (Chapter 2.0) includes adjacent residential uses in the discussion. Additional details are provided in the general response about land use in Chapter 8.2.1, General Response 1, Planning and Land Use.



Comments Letter

O-5-

My opposition is also joined by the four nearby HOAs that have promulgated motions opposing the project and the 4,000 signatures we obtained on a petition against the project.

I would like to meet with you to discuss some of the issues and will contact you next week after the dust has settled on the end of the comment period.

Sincerely,



Gerald I. Kent, Ph.D.

] O-5-5

] O-5-6

Response to Comments Letter

O-5-

**O-5-4** Chapter 2.0 of the land use report (Appendix O) discusses in detail how findings for the project can be made. Findings for the MUP have been prepared and are part of the package that decision makers will receive prior to making their decision about the project. The report concludes that findings can be made because the proposed use, with the design parameters proposes and summarized in the DSEIR, is consistent with uses in the area. The project's ability to make necessary findings required by the MUP as related to bulk, scale, and other factors, is also discussed in Section 3.1.4.3 of the DEIR.

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 land use report includes a discussion of the project's consistency with the Santa Fe Valley Specific Plan (SFVSP) (see Section 4.3 of the report, Appendix O). The analysis is also included in the DSEIR, Section 3.1.4.3 of the DSEIR, page 3-72+.

**O-5-5** The comment notes opposition to the project by four other Homeowners Associations (HOAs) in the area. The County acknowledges the comment. This comment will be included in the DSEIR that is provided to decision makers prior to their making a decision about the project.

**O-5-6** The comment has to do with scheduling a meeting. No issues about the DSEIR are raised and no response is necessary.

Comment Letter  
O-5

Response to Comment Letter  
O-5



**O-5-7** The comment is the first page from a PowerPoint presentation by Mr. Kent. This page introduces the presentation and makes no specific comments about the DSEIR. No response is necessary.

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## Site *Inappropriate* for the Proposed Multi-use Facility

□ Required findings to grant MUP *not possible*

□ Proposed project *inconsistent* with *policies, goals and objectives* of the Santa Fe Valley Specific Plan

□ No sufficient reason to grant SP amendment, rezone or height waiver

□ *This use is in conflict with the land use intent of the Specific Plan.*

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- O-5-8** The comment makes four general statements about the Project, regarding MUP findings and plan consistency. None of the statements raise a specific issue with the DSEIR, so no specific response is possible. General Response 1, Planning and Land Use, and EIR Section 3.1.4.3 “Physical Compatibility with Surrounding Areas/Community Character”, starting on page 3-76, provide a comprehensive response to issues that these statements touch on.

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7358 Findings are Required to Grant an MUP (1)

Before any use permit may be granted or modified, it shall be found:

- a. That the location, size, design, and operating characteristics of the proposed use will be compatible with adjacent uses, residents, buildings, or structures, with consideration given to:
  - 1. Harmony in scale, bulk, coverage and density;
  - 2. The 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; and to
  - 6. Any other relevant impact of the proposed use; and (con't next page)

O-5-9

O-5-9 The comment cites the text of required findings. No issues about the DSEIR are raised and no response is necessary.

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## 7358 Findings are Required to Grant an MUP (2)

Before any use permit may be granted or modified, it shall be found:

- b. That the impacts, as described in paragraph "a" of this section, and the location of the proposed use will be consistent with the San Diego County General Plan.
- c. That the requirements of the California Environmental Quality Act have been complied with.

O-5-9  
Cont.

- O-5-9** The comment cites the text of required findings. No issues about the DSEIR are raised and no response is necessary.

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## Proposed Development Incompatible with Adjacent Uses

**O-5-10**

Site is bordered by open space and residential within the Santa Fe Valley Specific Plan



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**O-5-10** The comment states that the Project is incompatible with adjacent uses. It notes the Project is bordered by open space and residential uses. The project does not make a specific comment on the DSEIR. General Response 1, Planning and Land Use, provides a comprehensive response to issues the statement touches on. The County agrees that the site is bordered by residential uses and open space, but notes that it is also bordered by civic uses.

Comment Letter  
O-5

Response to Comment Letter  
O-5

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## Proposed Use Incompatible with Adjacent Uses

O-5-11

Proposed	Type	Adjacent	Compatible?
Church	Civic	No	No
Pre-school	Civic	No	No
Café	Commercial	No	No
Bookstore	Commercial	No	No
Residence	Residential	Yes	No
All of the above	All	No	No

↪ There are no other properties in the SFVSP that comprise a combination of commercial, residential and civic uses  
 ↪ All other civic uses serve the entire community

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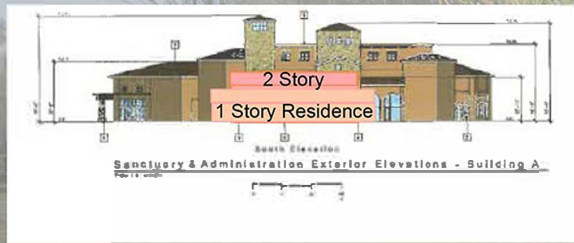
**O-5-11** .The comment provides a land use table and notes the proposed use is incompatible with existing uses. Column 3 ignores the fire station, which is an adjacent civic use. The table shows the proposed uses to be church, pre-school, café, bookstore, and residence. No pre-school or residences are proposed by the project. The café and bookstore are ancillary to and are in support of the church function, and are not as such commercial uses such as would be found in Black Mountain Ranch North Village located approximately 550 feet to the southwest. Sleeping accommodations will be provide for congregants who will remain at the facility for days up to a few weeks while they undertake Bible study or participate in symposia or missionary training. These will be guests and the stays will fall within the scope of transient occupation in conformance with County regulations. Column 4 of the table indicates none of the proposed uses are compatible with adjacent uses. Reasoning is not provided so a detailed response is not possible. However, churches are generally considered to be compatible with residential and other civic uses. The comment states there are no other properties that represent a combination of these uses within the SFVSP. The statement provides no specific reasoning as to why this is an undesirable use. Additionally, mixed use is a common use type in the area. These include Maranatha Church, Del Norte High School, and Design 39 School, among others. The comment also states all other uses serve the entire community. This is a subjective statement unsupported by facts. It is not an exaggeration to say that schools, churches, and medical facilities, to name a few, serve the entire communities in which they are located. The project is being sponsored by the Chinese Bible Church of San Diego which is an open church that welcomes visitors and new members alike. The church has stated its café and bookstore, as well as its services, will be open to all.



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## Scale, Bulk, Coverage And Density Towers Over Adjacent Uses

- Scale of campus buildings far exceeds surrounding residences **O-5-12**
- Articulation of the sanctuary *cannot resolve* the large scale
- 4 additional multi-story buildings amplify the problem



*Excessive Scale of the campus buildings fails harmony test,  
prohibits required finding for MUP*

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- O-5-12** The comment briefly states that scale, bulk, coverage and density tower over adjacent uses. Buildings will not tower over other uses because of the site topography and project design. The statement is general in nature and so a detailed response is not possible. General Response 4, Visual Resources, DSEIR Section 8.2.1, provides a comprehensive response to visual effects.

It further states the scale of the project far exceeds surrounding residences, that articulations of the sanctuary will not resolve the scale issue, and that multi-story buildings are a problem. These points do not raise specific issues with the DSEIR, so no specific response is possible. General Response 1, Planning and Land Use and EIR Section 3.1.4.3 "Physical Compatibility with Surrounding Areas/Community Character", starting on page 3-76, provide a comprehensive response to issues that these statements touch on.

The comment further states the project fails to address all required findings for the MUP, and provides a table on page 69 of these Response to Comments. The table states there are no civic uses adjacent to the project. The County disagrees with these statements. Please see General Response 1, "Planning and Land Use," referred to above. The project considers both adjacent and nearby uses. This requires that the analysis go outside of the SFVSP area to encompass existing uses and provide a fair and balanced assessment of the site. Considering only the uses surrounding the project does not provide an accurate or balanced picture of the area. For example, using the table, the fire station across the street from the project entrance would not be included in the land use analysis. This would be a distortion of the actual uses that are part and parcel of the community character of the area.

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## Project Update Fails to Address All Criteria for MUP

**O-5-12**  
Cont.

- ❑ Scale, Bulk, Coverage and Density Harmony
- ❑ Comparisons should be:
  - *Within planning area* • *Fair* • *Representative*

Adjacent Land Use	Perimeter (Est. ft.)	Adjacent Periphery	Considered	In Planning Area?
Single Family	1,234	45%	Yes	No
Apartment	200	7%	Yes	No
Civic	0	0	No	N/A
Commercial	0	0	No	N/A
Open Space	1,330	48%	No	Yes

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**O-5-12** Cont. The comment states on page 9 that the smaller buildings of the project do not scale to single family homes in the area. When all uses in the area are considered, the smaller buildings scale well in a comparison. For example, the apartments south of the project are approximately 40 feet in height and are at an elevation of approximately 10 feet above the proposed project elevation. This compares to the fellowship hall (Building D) which will be 32.5 feet. Even the sanctuary building, at 40 feet with a height exception, will be no taller than the apartments. Even considering single family homes, the homes to the east are 30 feet in height, which is just 2.5 feet lower than the second tallest building proposed, the Fellowship Hall. Two of the buildings, C and B, will be 29.5 feet in height, which makes them shorter than some residences. The mass of the building in question are by their nature different. The masses of the smaller buildings compares favorably with the nearby apartments, and the civic uses to the southeast and west.

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## Even Smaller Buildings *Do Not Scale* to Adjacent Homes

- We make our comparisons within our planning area, but proposer goes far beyond
- No transition is provided to single family homes
- La Viña (South) >>>>>>>
- Rosemary Lane (East) >>>>
- Campus buildings **2-1/2 times the size** of homes
- Sanctuary and towers have up to **50% additional height**



O-5-12  
Cont.

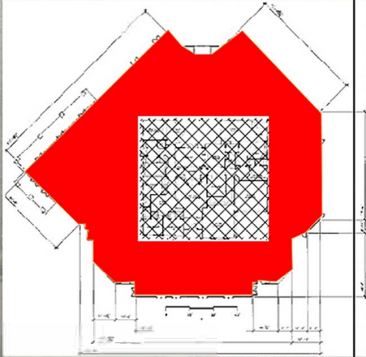
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## Scale, Bulk, Coverage And Density Far Exceeds Surrounding Uses

O-5-13

- The bulk of the campus buildings far exceeds that of the surrounding residences
- The Savenna 1 story including courtyards fits well inside the sanctuary seating area!
- Footprint of 2 story homes is even smaller
- Residence heights lower than main building *and ½ of tower*
- Bulk is not in harmony with surroundings or plan
- Bulk cannot be reduced by articulation

*Cannot make finding for MUP: buildings of incompatible bulk*



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**O-5-13** The comment address the bulk of the project. It includes a plan view of the sanctuary building with a house plan superimposed. The County acknowledges that the sanctuary has more bulk than any one single family residence in the area. This is expected due to the different use envisioned. But single family homes are not the only land use in the area, as discussed in General Response 1, Planning and Land Use. The bulk of the sanctuary was compared to a range of uses in the area. Using a balanced approach, consideration of all uses in the immediate and nearby area is appropriate. This would include the mass of the apartments to the southeast. Please note General Response, Visual Resources, and EIR Section 3.1.4.3 “Physical Compatibility with Surrounding Areas/Community Character,” starting on page 3.76, for a comprehensive response to the issue of bulk.

The comment on page 70 addresses the bulk of the project and includes a table that compares the volume of the sanctuary building with residential and civic uses. The bulk of the sanctuary needs to be compared to a range of uses. Please see General Response 4 and EIR Section 3.1.4.3 “Physical Compatibility with Surrounding Areas/Community Character”, starting on page 3-76 for a comprehensive response to the issue of bulk.

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## Scale, Bulk, Coverage And Density Far Exceeds Surrounding Uses

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Use Type	Footprint (ft <sup>2</sup> )	Height (ft)	Volume (ft <sup>3</sup> )	Factor
Sanctuary Example	20,000*	35	700,000	1.0 (base)
Residential	3,234	23.8	78,830	8.9
Civic	10,000	20	200,000	3.5

\* Minimum

Cannot make finding for MUP with a factors of ~3.5–9 in bulk

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O-5-13  
Cont.

**O-5-13** The comment address the bulk of the project. It includes a plan view of the sanctuary building with a house plan superimposed. The County acknowledges that the sanctuary has more bulk than any one single family residence in the area. This is expected due to the different use envisioned. But single family homes are not the only land use in the area, as discussed in General Response 1, "Planning and Land Use." The bulk of the sanctuary was compared to a range of uses in the area. Using a balanced approached, consideration of all uses in the immediate and nearby area is appropriate. This would include the mass of the apartments to the southeast. Please note General Response, Visual Resources, and EIR Section 3.1.4.3 "Physical Compatibility with Surrounding Areas/Community Character," starting on page 3.76, for a comprehensive response to the issue of bulk.

The comment on page 72 addresses the bulk of the project and includes a table that compares the volume of the sanctuary building with residential and civic uses. The bulk of the sanctuary needs to be compared to a range of uses. Please see General Response 4 and EIR Section 3.1.4.3 "Physical Compatibility with Surrounding Areas/Community Character", starting on page 3-76 for a comprehensive response to the issue of bulk.

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## Scale, Bulk, Coverage And Density Far Exceeds Surrounding Uses

O-5-14

Surrounding Use Type	Surrounding Coverage (Build area/acre)	Proposed Coverage (Build area/acre)	Overage (factors)
Open space	0	0	∞
Residential	3,234	6,092	1.9
Civic	3,354	6,092	1.8

Cannot make finding for MUP with a factor of ~2 in coverage usurps SP transition policy

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**O-5-14** The comment addressed coverage of the project. The land use analysis (Appendix O) and the DSEIR visual analysis (page 2-20) and the land use analysis (Section 3.1.4.2, page 3-64) extensively discuss coverage in the area. Please see DSEIR Table 3.1-16 for a summary of uses, their heights and coverage. The analysis concludes that the project is consistent with uses in the area in terms of lot coverage.

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## Scale, Bulk, Coverage And Density Far Exceeds Surrounding Uses

0-5-15

Existing		Proposed		
Surrounding Use Type	Surrounding Density (pop/acre)	Proposed Density 2,500 (pop/acre)	Design Density 3,750* (pop/acre)	Overage Multiplier (factors)
Open space	~0			
Residential	4.5	297	445	66 / 99
Civic	4.2	297	445	70 / 106

\* We will show more likely based on local church demographics

Cannot make finding for MUP with such dramatic factors in density

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**O-5-15** The comment states population density far exceeds surrounding uses. Density in planning terms generally refers to the number of dwelling units per acre (Zoning Ordinance (ZO) Section 4110a). In planning terms the density of the site is 0 because no permanent residents will live there. Regarding an analysis of population effects, this is reflected in the traffic report, which measures the number of vehicle trips that would be expected from the number of participants proposed. The assertion that the project will generate more than the projected number of participants does not take into account that the project is being proposed in two phases, with the first phase consisting of a 1000 seat sanctuary and the second phase adding 500 more seats, for a total of 1,500 seats. The DSEIR's various analyses used this larger number is assessing project impacts. Therefore growth has been built into the analysis. No changes to the DSEIR are required as a result of the comment.

The comment, page 75, states the project fails on a quantitative basis, and includes a table. The statement asserts a private opinion and table cannot be understood absent the context of an accompanying narrative. No response is necessary.

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## Every Aspect of Harmony in Scale, Bulk, Coverage and Density **Fails** on a Quantitative Basis

O-5-15  
Cont.

	Residential	Civic
Scale	~3	
Bulk	8.9	3.5
Coverage	1.9	1.8
Density	66/99	70/106

*Finding for MUP not possible based on lack of harmony*



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## Concerns Lead to Uncertainty

- Peak campus population
  - Originally stated as 2,500
  - Current proposal: not mentioned
  - Local church metrics lead to 3,750; **should be used to evaluate impacts**
  - Especially since CBC will hold 3 services, where others at most 2
  - Drives problems in parking, traffic and GHG emissions
- Pre-school/kindergarten
  - Omission reduces traffic, GHG, **but**
  - Was important objective previously
  - Still appears in some submitted docs
  - Is consistent with CBC's stated mission
  - **No facility reduction** accompanied the omission
  - Is a **reasonably foreseeable growth** path for the campus
  - **Impacts must be included**

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O-5-16

O-5-17

**O-5-16** The comment states the church usage will be higher than the 2,500 congregants originally stated for the Project. This number does not occur in the DSEIR or the traffic study for the project. The DSEIR is clear that 1,500 seats will be provided after the conclusion of the two planned phases of the project (DSEIR Section 1.2.2.6, page 1-6). Please see Response O-5-15 above. The comment also states parking, traffic, and GHG emissions would be a problem within the context of a peak campus population. Estimates from “other church metrics” are not defined and so a response is not possible.

**O-5-17** The comment discussed the pre-school for the project. No pre-school is proposed for the project. A response is not necessary.

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## Building Metrics Support a Population of 3,750 >> 2,500

**O-5-18**

- Local churches
  - Maranatha: 2.5 attendees / seat
  - Church at Rancho Bernardo: 2.5 attendees / seat
  - Rock Church: 2.89 attendees / seat
- Proposed project
  - The Proposer claims slow growth, however:
  - 1,500 seats x 2.5 = 3,750 attendees
  - Originally proposed population of 2,500 understated by 1,250, a 50% increase
  - The 50% will impact:
    - Traffic - Parking - Noise
- *Population base has already grown!*
  - Original: 2 campuses combined • Current: 3 campuses to be combined

*Understatement calls analysis integrity into question*

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**O-5-18** This comment states building metrics support a population of 3,750 versus 2,500. The comment sites attendance data from three local churches to support the idea that use of the site will be more intense than planned. It also sites 2,500 as a previously stated usage number for the Project. An overall attendance estimate for the project is not given in the DSEIR and is not required for an accurate environmental analysis. Traffic, air quality and greenhouse gas analyses use methodologies tied to vehicle trips. SANDAG's "(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region" (2002) for weekday trips and on Institute of Transportation Engineers trip generation rates from the 8th edition for weekend trips provide accepted methodologies for estimating traffic. No changes to the DSEIR are needed as a result of the comment. Please see Response O-5-16 for a discussion of the potential growth of the church population.

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## Density Comparison Defines Level of Intensity

- ☐ **~300** people/acre: Proposed  
2,500 stated peak load over ~8.42 acres
- ☐ **~425** people/acre: “Qualcomm Stadium”  
70,561 people over 166 acres
- ☐ **~445** people/acre: Based on Local churches  
Metrics from other churches yields population of 3,750 over ~8.42 acres

*Higher density than the “Q”?*  
*A Low –Medium neighborhood adjacent to open space is no place for this intensity of development*

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**O-5-19** The comment relates to the number of congregants that might use the site. Please see Responses O-5-16 and O-5-18 above.

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## Neighborhood Character Dramatically Changed by Traffic / Parking

- **Now:** Four Gee / Campania used for recreation, *rarely for parking*
- **With MUP:** Generation of traffic, excess trips
  - 1,660 trips for 2,500 attendees on weekends
  - 2,500 trips for 3,750 attendees (more likely)
  - Pre-school impacts should be considered
    - 300 ADTs preschool drop-off/pickups at rush hour
    - 382 ADTs for 860 daily population
  - Updated CBC traffic study will be reviewed in another comment
- **With MUP:** Weekend parking overflow exceeds local street capacity
- Design plan not guarantee compliance
  - Drop-offs in residential areas, on busy 4 lane major; Examples of problems
    - Oak Valley MS
    - Westview HS

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**O-5-20** The comment states community character will be dramatically changed, enumerates attendance assumptions for the project and suggests that there will be excess traffic trips. The comment uses figure of 2,500 attendees, includes a “more likely” level of traffic of 3,750 attendees, and states the pre-school should be considered as a traffic generator. Please see Responses O-5-16 and O-5-18 above

**O-5-21** This comment addresses neighborhood character within the context of traffic and notes that Four Gee and Campania is used for recreation, rarely for parking. The project is not proposing any on-street parking. All parking will occur within the project site. The project provides 417 parking spaces, more than the 375 spaces required by the County of San Diego. In addition it includes an overflow parking area. 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 project design includes a large circular drive located well within the project boundaries that is designed for easy drop-off of congregants. The Project uses methodology in the County of San Diego Parking manual to estimate parking needs. The comment (page 80) also includes a table that relates linear feet of parking to a population number. For a discussion of the use of overall population numbers, please see Response O-5-18.

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Updated to reflect 9/17 proposal

## Parking Requirements Will Overflow the Neighborhood

O-5-21  
Cont.

Campus Population (No. People)	Ratio (persons/car)	Parking (Cars)	Site Overflow (Cars)	Site Overflow (Curb ft)	Neighborhood Overflow (Curb ft)
2,500	2.00	1,250	875	17,500	<b>10,500</b>
2,500	2.29 <sup>1</sup>	1,095	720	14,400	<b>7,400</b>
2,500	2.50 <sup>3</sup>	1,000	625	12,500	<b>5,500</b>
2,500	4.00	625	250	5,000	<b>0</b>
3,750 <sup>2</sup>	2.29 <sup>1</sup>	1,638	1,263	25,260	<b>18,260</b>
3,750	2.50 <sup>3</sup>	1,500	1,125	22,500	<b>15,500</b>
3,750	4.00	938	563	11,260	<b>4,260</b>
On-site pkgng= 417 <sup>4</sup>		20 curb ft/car		7,000 curb ft available	

- <sup>1</sup> 2.29 persons/car is average from several church planning organizations  
Range of 1.8-3 stated to be more realistic than government "allowed"
- <sup>2</sup> 3,750 likely peak population based on local churches
- <sup>3</sup> Zoning Code proposed amendment. Only ratio proposed by staff not accepted by BoS
- <sup>4</sup> Current proposal

Miles of curb necessary *outside the neighborhood* in most cases

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## Added Traffic Far Exceeds Planned Infrastructure

**O-5-22**

- The proposed land use is religious assembly/multi-use
- The ancillary uses include: • Education (Pre-K & K) • Restaurant (Café) • Retail (Bookstore) • Offices • Lodging (Short-stay hotel) • Recreation
- Phase I (1,000 Seats, 50 pupils) • Phase II (1,500 Seats, 150 school pupils)
- Unplanned future phases for eventual growth
- Baseline vehicular traffic for the project site is *Residential*

Period	SFVSP Base (ADT)	Proposed Project PH I (ADT)	Proposed Project PH II (ADT)	Base Multiplier* (factors)
TOTAL Weekday	48	857	1,084	22.6
TOTAL Weekend	48	1,707	1,903	39.6

The intensity of proposed uses far *exceeds* planned Residential ADT base by *large multiples*

A separate document will consider DSEIR traffic issues

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**O-5-22** This comment states added traffic far exceeds planned infrastructure, and cites the pre-school and “unplanned future phases.” A pre-school and phases beyond Phase 2 are not a part of the project. For a discussion of traffic and infrastructure, please see General Response 3, “Traffic, Parking, and Queuing” in DSEIR Section 8.2.1. The comment also includes a table, but the content is not clear absent additional supporting information. No response is necessary.

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## Residential Neighborhood Character Would be *Changed by More than Just Traffic*

- Currently Quiet
  - Residential • Open space • Park
  - Cyclists • Runners
  - Bridle path
- Character changes
  - Commercial hours of operation to 10:00 PM inappropriate for L-M zoned residential area
  - Out of scale buildings
  - Many people – *99.24% from outside the area – outdoor recreation, audio*
  - Heavy Traffic, impacted intersection, blocked driveway
  - Significant Street Parking overflow with cruising traffic
  - Illuminated signage without blinking/flashing/strobe
  - Bell tower
    - Way out of scale, noisy if used
    - There are no others

O-5-23

**O-5-23** This comment states that neighborhood character would be changes by commercial hours, out of scale buildings, many people, heavy traffic, street parking, illuminated signs, and a bell tower. No details of these assertions are provided, so a specific response is not possible. For a discussion of the land use issue, please see General Response 1 “Planning and Land Use” in DEIR Section 8.2.1.

4S SFV MPAC

## Site *Not Suitable* for the Proposed Intensity of Use

O-5-24

- ❑ Planned as Rural Residential Use Regulation and LM Density (0.53 – 1 du/acre)
- ❑ Single access
  - Across from fire station – impacting response and public safety
  - Too close to La Viña drive (violates Public Roads Standard)
  - Close to Camino del Sur Intersection
- ❑ Large traffic load when neighborhood cars active
  - On weekends (multiple services/fellowship/Sunday school, book store, café)
  - At rush hour during the week (drop-off/pick-up) *with pre-school properly included*
- ❑ Incompatible operations for residential area:
  - 7 days/week
  - Mixed use
- ❑ Large parking area highly visible (20 feet below grade of adjacent homes)
- ❑ Added traffic exceeds residential base by large multiples
- ❑ Overflow parking will saturate local streets at peak
- ❑ Biologically sensitive open space border (48%), adjacent to Artesian Creek
- ❑ Adjacent residential (52%)

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O-5-24 The comment states the project is out of character for the proposed intensity of use, and cites proximity of the fire station, roads, traffic volumes, incompatible operations, visible parking areas, open space, and adjacent residential uses. These statements are presented in summary form, so a detailed response is not possible. Please see General Responses 1 - 4 "Planning and Land Use, Biology and the Resource Protection Ordinance, Traffic, and Queing, and Visual Resources" for comprehensive responses to the issues raised.



**4S SFV MPAC**

## Scale/Bulk/Coverage/Density Inconsistent with General Plan

- Multiple-use should be in commercial centers
  - Minimize traffic
  - Maximize pedestrian activity
- Proposed project *lacks* transition
  - Intensity is population/operation based
  - Violates **General Plan** requirement
  - Adjacent to
    - Open space
    - Single family residential
    - Consideration of comparisons outside planning area to justify land use changes violates GP policy
- Remainder parcel anticipated zoning (LM: 0.53 – 1 du/acre)  
4 remaining lots for estate style homes
- Zoning /category should not be adjusted to allow height of 53 ft

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**O-5-25** The comment states the scale, bulk, coverage, and density are inconsistent with the General Plan. It also states multiple uses should be in commercial centers. The comment makes general assertions so a detailed response is not possible. Please see EIR Section 3.1.4.3 “Physical Compatibility with Surrounding Areas/Community Character”, starting on page 3-76 for a discussion of the issues raised. The comment about multiple uses does not raise an issue with the DSEIR so no response is necessary.

**O-5-26** The comment states the project lacks transition due to intensity, violation of the General Plan, and adjacency to open space. Please see General Responses 1 (Planning and Land Use and 2 (Biology and Resource Protection Ordinance) for comprehensive discussions these issues.

**O-5-27** This comment states the anticipated zoning for the site would allow 4 lots. It also asserts the allowed height should not be adjusted. Please see General Response 1 for a discussion of both of these issues.

4S SFV MPAC

## Proposer's Project **Violates** Mandates of the Santa Fe Valley Specific Plan

- The designated non-residential property in the SFVPA:
  - Designed to service the Community (17,590)
  - Is itself of low intensity use
  - Has fixed size driven by the plan for the allowed residential population support services
  - Is placed in high density areas where necessary to minimize traffic generation
- Proposed project
  - Congregation (134) is a small fraction (0.76%) of the 4S Ranch population (17590)
  - Serves people mostly from outside the area
  - Is of high intensity use itself (increment of 2,500 people, unsupported by current infrastructure)
  - Generates unplanned traffic
  - **Has unlimited growth potential**
- Non-residential zoning should be intentionally located\*
  - In the high-density residential area
  - Within walking distance of high-density residential
  - Mandated to reduce traffic, not increase traffic

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**O-5-28** This comment states the Project violates the mandates of the SFVSP because non-residential properties in the SFVSP are designated to serve the community, are low intensity uses, have a fixed size, and are placed in high density areas. These characteristics fit the project as proposed. Please see Response O-5-11 and General Response 1, "Planning and Land Use."

**O-5-29** The comment states that non-residential zoning should be located in high density areas, within walking distance of high density residential. Project zoning and proximity to high density residential uses supports these principles. Many non-residential uses are located in the area for similar reasons. These include the high school, middle school, churches, and commercial uses.

The comment also notes non-residential uses should be mandated to reduce traffic. Non-residential uses by their nature include traffic. Traffic can be reduced by the use of shuttles and by offering multiple functions at a given destination. The project incorporates both of these measures.

4S SFV MPAC

## Non-residential Uses in Region Are Appropriately Sited

O-5-30

- Library
  - Staff population small, visitors distributed in time
  - In commercial area
  - Adequate parking
- Fire House
  - Continuous small staff population
  - On side of street with park
  - Serves community very well
- Sewage treatment
  - Largely hidden
  - Staff population small
  - Uses school road for access
- Shopping
  - Dedicated commercial areas
  - Adequate off-street parking
  - Multiple access points

*Services are designed to standards set and and required by the SFVSP.*

*A large increment to even a transient population, would require additional infrastructure.*

*All built to serve residents, no large outside growth potential*

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O-5-30 The comment states non-residential uses in the region are appropriately sited. Please see Responses O-5-28, and -29 and General Response 1, "Planning and Land Use."

4S SFV MPAC

## Community Opposes this High Intensity Project

Updated 9/17

O-5-31

- Four local HOAs adopted resolutions *opposing* the Proposed Project
  - Savenna–Bel-Étage
  - Salviati
  - La Viña
  - 4S Ranch
- Rationale for resolutions
  - Local residents have largest negative impacts
  - Directors trying to protect their communities
  - Diminution of property values
- 4,000 Signatures on petition against the development

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**O-5-31** The comment states four local HOAs have adopted resolutions opposing the Project. It also states that 4,000 signatures were gathered opposing the project. The County acknowledges the comment. No issues related to the DSEIR were raised, so no response is necessary.

**4S SFV MPAC**

## Recommendation Should be to **Deny** SP Amendment and MUP

O-5-32

- ❑ Proposed project is **NOT CONSISTENT** with the Goals, Objectives, and Policies of the Santa Fe Valley Specific Plan
- ❑ No support for discretionary grant of MUP
  - Out of harmony: scale, bulk, coverage, density & operations
  - Is not consistent with existing neighborhood character—
  - Significant, **un-mitigable** harmful impact on community
  - Commercial operation: 7 days/week, 10:00 PM / 24 hours/day
  - Inappropriate next to single family residences
  - Does not support open space mandate
  - Inconsistent with General Plan
- ❑ Currently services tiny portion (**0.76%**) of the 4S Ranch and Santa Fe Valley
- ❑ Required accumulated exceptions prove incompatibility
- ❑ *SDCPG spent 2 years carefully planning the Santa Fe Valley to have a rural/semi-rural character and provide a livable environment for the residents. It should not be changed now!*

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**O-5-32** The comment summarizes opposition to the Project, stating it is not consistent with the SFVSP, does not support a MUP, serves a small part of the 4S Ranch community, requires exceptions, and because the rural/semi-rural use of the site should not be changed. Specific responses are not possible due to the generality of the statements. General Response 1, "Planning and Land Use," and EIR Section 3.1.4.3 "Physical Compatibility with Surrounding Areas /Community Character", starting on page 3-76 provide a comprehensive response to these issues.