

RESPONSE TO COMMENTS

A period for public comments on the Draft Supplemental Environmental Impact Report (DSEIR) for the Chinese Bible Church took place from August 24, 2017 to October 29, 2017. All comments received during this period, and the County's responses to those comments are provided in this section. The section has three parts: (1) a List of Persons, Organizations and Public Agencies That Commented on the Draft EIR; (2) four general responses on the subjects of land use and planning, biology, traffic, parking and queuing, and visual effects; and (3) the comments and responses texts.

The focus of the responses to comments is on the disposition of significant environmental issues raised in the comments, as specified by Section 15088(c) of the CEQA Guidelines. Detailed responses are not required to be provided to comments on the merits of the Proposed Project.

The County's responses to comments on the DSEIR represent a good-faith, reasoned effort to address the environmental issues identified by the comments. The County is required to respond to those comments on the DSEIR that raise environmental issues. In accordance with CEQA Guidelines 15088 and 15204(a), the County has independently evaluated the comments and prepared the attached written responses describing the disposition of any significant environmental issues raised.

LIST OF PERSONS, ORGANIZATIONS, AND PUBLIC AGENCIES THAT COMMENTED ON THE DRAFT SEIR

LETTER DESIGNATION	COMMENTATOR	ADDRESS
	FEDERAL AGENCIES	
No letters were received from federal agencies		
	STATE AGENCIES	
No letters were received from federal agencies		
	COUNTY, CITY, AND OTHER LOCAL AGENCIES	
A-1	City of San Diego	1010 Second Ave. 1200 E Tower, MS413 San Diego, CA 92101
	ORGANIZATIONS	
O-1	Coast Law Group, LLP	1140 South Coast Highway 101 Encinitas, CA 92024
O-2	Endangered Habitats League	8424 Santa Monica Blvd, Suite A592 Los Angeles, CA 90069-4267
O-3	San Diego County Archaeological Society, Inc.	PO Box 81106 San Diego, CA 92138-1106
O-4	4S Santa Fe Valley Mega Project Abatement Coalition	jerrykent@cox.net
O-5	Gerald I. Kent letter and Power Point for 4S Santa Fe Valley Mega Project Abatement Coalition	jerrykent@cox.net
O-6	San Dieguito Planning Group	c/o Doug Dill, theddills@att.net
	INDIVIDUALS	
I-1	Robert and Patty Anders	rpanders@cox.net
I-2	Jason Hightower	16942 Silver Crest Ln. San Diego, CA 92127
I-3	Shamim, Habib, and Jasmin Husain	Silver Crest Drive San Diego CA 92127
I-4	Arne Johanson	17269 Silver Gum Way
I-5	Bruno Leone	bruleone@cox.net

GENERAL RESPONSES TO COMMENTS

This section presents General Responses to the Comments. For cases where public comments were of a general nature, or where the intent of the comment was unclear, general responses were generated to provide a comprehensive response to points raised. The general responses focus on the issues raised and are not intended to be a full discussion of the subject areas. The reader is referred to the DSEIR for a full discussion of the subject areas.

General Response 1: Planning and Land Use

Planning

The Specific Plan designates the area as Low Density Residential with a density of 1 dwelling unit per 1.9 acres. This would allow up to four residences on the site. A Specific Plan Amendment is required because the environmental document prepared for the original Santa Fe Valley Specific Plan (SFVSP) did not cover some of the issues raised by the proposed Project and because a MUP is being requested.

A Major Use Permit (MUP) is allowed by current zoning and is proposed to regulate the proposed uses on the site. The need for a MUP does not indicate the Project is proposing an incompatible use for the site. Instead, it allows for discretionary review of the Project, including the need for specific findings and environmental review. A comprehensive discussion of findings is included in General Response 5.

The Project does not propose a rezoning of the site.

Land Use Plans

Comments state the project is not consistent with any land use plans. The General Plan (GP), the San Dieguito Community Plan (SDCP), and the Santa Fe Valley Specific Plan (SFVSP) were reviewed and analyzed in the land use study (Appendix O) and the DSEIR (Section 3.1.4). 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 GP guiding principles and the goals and policies. Conformance with the SDCP/SFVSP is provided in Appendix O, Sections 4.2 through 4.4 and in the DEIR, Section 3.1.4.3, page 3-72+. These analyses found that the project, with proposed design measures, is consistent with the plans. Consistency was generally based on the following factors. The project:

1. Meets the Guiding Principles of the General Plan (GP)
2. Provides a community resource, a church, that can serve community needs in a number of ways
3. Reduces vehicle trips through planning, design, and operational limits
4. Mitigates all impacts
5. Is compatible with topographic limits of the site
6. Proposes a design, materials, and landscaping that are of high quality and reflective of design standards in the area and that promote sustainability

7. Preserves and protects natural resources

Physical Land Use

The project's impact on physical land use was extensively analyzed in the DSEIR. The land use assessment determined that land use impacts were not significant. The DSEIR is clear that there are a range of uses in the area, and DSEIR Figure S-3, Aerial Photograph, provides a clear representation of these uses. All uses, including open space, residential, commercial, civic, as well as buildings, sidewalks and trails, are included in the analysis to provide an accurate representation of the site's current setting. This includes uses immediately adjacent to the site such as single- and multi-family residences to the east and south, civic uses to the southeast and west, and open space. It also includes uses that surround the site at a greater distance but are connected to the site by visual effects, transportation links, and community resources that interconnect with the site and adjacent uses, such as schools, major shopping areas, and key residential uses. This includes the single-family residences to the north, a park to the east, Black Mountain Village North, a high school and middle school to the south. This inclusion is appropriate to provide a full picture of the uses as they have evolved in the area. A focus on immediately adjacent uses reveals the area as a developed suburban setting with some natural areas preserved in open space. Inclusion of surrounding uses confirms this conclusion.

The inclusion of surrounding uses is not used to justify the project, but to provide an objective assessment of the existing conditions on and surrounding the site, and in the vicinity. This conclusion does not disparage the previous work done in writing the Specific Plan, which was approved in 1995, and evaluated a different set of circumstances. The DSEIR found that, given the existing situation in the area, and the project with its proposed design measures, there would not be a significant effect on land use in the area.

Height Exception Request

A height exception processed through the Major Use Permit is requested to allow one tower to be 43 feet and two towers to be 41.5 and 39.5 feet respectively. The scale of uses in the area is in part determined by intended uses compared to existing uses or resources present. The adjacent residential apartment complex, for example, is 40 feet in height and supports three stories. The fire station to the west supports a 44-foot tower. Table 10 of the land use analysis (Appendix O) notes other buildings where building heights are similar to those proposed by the Project. When considered together with other surrounding uses, however, the height exception is seen to be in keeping with uses in the area.

A number of additional factors serve to diminish the effects of the height exception. Building in will be built approximately 5 to 10 feet below grade on the south, so a 35 foot building will have an apparent height of 25 feet from this perspective. Buildings will appear shorter from the east in part because of this grade differential. Homes on the east are

built at an elevation 20 feet higher than the site. The altered angle of the view prevents most of the buildings from rising above the current horizon line as shown in DSEIR Figure 2.1-10, Key View 8. And they will be lower than the apparent height of the apartments to the south. While the sanctuary and towers will appear slightly above the horizon line, they will block less of the view to the west than the existing trees on the site. Landscaping will diminish the verticals of the buildings because the lower reaches of the buildings will be screened.

Open Space

Protected open space exists on two sides of the project, to the north and the west. The northern area will not be directly impacted by the project and will remain as currently configured. Some indirect could occur as a result of intrusion into the site so a buffer is incorporated between building and the open space boundary. The open space will therefore remain as a community amenity.

Operations

The operational impacts of the project are evaluated in the land use analysis (DSEIR Appendix O, Chapter 2.0). The visual report (DSEIR Appendix C) evaluates effects of nighttime lighting. The noise report (DSEIR Appendix D) examines the effects of traffic noise, the bell system, and outdoor events. Traffic volumes during the weekday and weekend are examined (DSEIR Appendix B). Dust and other operational effects are evaluated in the air quality report (DSEIR Appendix K, Section 4.2.2).

The DSEIR determined that there are significant operational impacts to the surrounding community from hazards and noise. Measures are proposed that mitigate all project impacts. In addition, specific conditions will be imposed on the Major Use Permit (MUP) to limit effects on the community. These include limits on operational hour (8 AM to 10 PM, with gates locked at 10), number of services in a week, nighttime restrictions on use of the overflow parking lot, and limits on special events. A listing of these limits is found in the DSEIR, Section 3.1.4.3, Operations, page 3-81 and in Chapter 7.2 of the DSEIR. The specific limitations on noise, lighting, and transportation will avoid significant impacts to the surrounding community.

The project operations will also be mediated by the nature of the proposed use, a church and related activities. During the week these will be of low intensity consisting of administrative activities, fellowship, Bible study and similar activities. During this time, activities will generally be indoors. The more intensive use will occur one day a week, on Sunday, when church services will be held. Limitations noted above will diminish this effect.

Design features will also limit operational effects. Excess parking is provided to minimize the possibility of off-street parking. It will only be used when needed in order to minimize noise and lighting effects. Extensive landscaping will compliment buildings, screen parking areas and outdoor plazas. Below grade construction will help diminish visibility of outdoor uses and parking from the south.

Density is reflected in how uses are distributed over a site. The project proposes a loose cluster of buildings toward the center of the site to allow buffers between the project and surrounding uses. Architectural and landscape planning designs are used to diminish a sense of density. This includes features like articulated building facades, covered walks, and large courtyards to separate building masses. Landscaping will provide an overall “cover” for the site, reinforcing a campus-like setting. The DESIR states that the project provides a lower intensity civic use that is adjacent to higher density residential and commercial village uses, thereby serving as an appropriate transitional land use (DSEIR, Section 3.1.4.2, page 3-72).

Intensity of use is determined by a range of factors such as the scope of the project, traffic, operating hours, noise, and lighting, which are analyzed in the above-cited chapter. A contrast can be drawn between the commercial center 580 feet from the site (Black Mountain Ranch North Village) and the project. The commercial center has an intense use pattern due to its large size, approximately 634,000 sf of buildings, and intense traffic patterns from shoppers, employees, and delivery vehicles, as well as long operating hours seven days a week. It employs bright lighting for commercial purposes and generates noise from deliveries and substantial traffic. The project in contrast will generally be a low intensity use as noted in the operational discussion. It will have a very light traffic pattern six days a week. Evening activities, lighting, signage, and noise will be minimal and noise at outdoor activities will be evaluated to conform to the County’s noise ordinance.

Community Character

Overall, the proposed use will complement the community by bringing a valued publicly-oriented use to the area. Addition of a church to the area will add to the breadth of uses already present. The church will be welcoming of visitors and new members alike. It can also provide a community resource for meetings and gatherings. The project would be located in an area with mixed-density residential uses, nearby commercial centers and other civic facilities, including a fire and police station. The design would not change the dense suburban character of the area because it would bring the same high quality design features and landscaping already characteristic of the community. Proximity to existing infrastructure promotes alternatives to automobile use. Operation of the proposed church, at buildout, would not alter the community character significantly due to its low intensity, design features, and the controls placed on it by the MUP. The immediate existing built uses (multi- and single family residential, sheriff’s station and fire station) surround the site and adjoining northern open space, generally at higher elevations. The open space is at the center of this area and will be preserved by the project. Thus the sense of openness now a part of the community will be preserved in those areas.

The project is a joint effort of three already existing churches in the region: one is at Maranatha Christian School a mile west of the site. A second is located in Rancho Bernardo, approximately 3.0 miles east. A third is located at a commercial center 1.5 miles from the site.

These sites will be closed when the project is operational. Rather than being from outside the community, the project draws together people who are already using community worship services in the area.

General Response 2: Biology and the Resource Protection Ordinance

Open space occurs north and west of the project. The northern open space, some of which is on-site, extends to Campania Drive to the north. It runs the length of the project's northern boundary and its width varies from 620 feet on the west to 185 feet on the east. The project has no direct impacts to this open space. The open space to the west is a narrow strip approximately 220 feet wide that runs the length of the project's western boundary and ends at the project's southwest corner. The project will impact 0.17 acres of this area for its entrance, the proposed Grace Way. It mitigates this impact by proposing to provide off-site mitigation equal to the area impacted. 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."

Indirect effects are analyzed in the DSEIR on pages 2-47 and 2-48 in Section 2.2. Project design measures are used to minimize indirect impacts and include wetland buffers, as discussed below. Installation of a retaining wall and fence separating the developed area from existing onsite open space easement area would serve as a barrier to increased human access. The landscape plan would also stipulate that project landscaping would not include exotic plant species listed on the California Invasive Plant Council's (Cal-IPC) "Invasive Plant Inventory" list. Predation from domestic animals is not expected since residential uses that could result in the introduction of domestic pets are not proposed. Good housekeeping practices incorporated into project design such as the proposed secure garbage area would minimize nuisance animals such as crows that could affect raptor usage of the open space. Therefore, no adverse impact to sensitive species would occur.

The northern wetland supports an area of Emergent Wetland (EW). There are no direct impacts to this area, as noted, but indirect impacts are possible. In accordance with the Resource Protection Ordinance (RPO), Section 86.802(r), a 50 foot no-build wetland buffer is used to minimize these impacts. No uses or activities will be allowed within this area. For example, this area will not require additional fuel modification and vegetation management. To accommodate this buffer, minor design changes were made to the project. The retaining wall was moved south five to ten feet. Parking areas were rearranged although the proposed number of parking spaces was maintained at 417. A volleyball court was moved approximately 45 feet to the southwest. An additional 100 foot buffer from the edge of the no-build buffer was put into place to ensure a fire-safe setting is maintained. Buildings, landscaping, hardscape, and the volleyball court will occur within the buffer. All fuel management and landscaping shall be in conformance with Section 4704.4 of the Consolidated Fire Code and District Ordinance 2014-01A in order to maintain a fire-safe setting. The Rancho Santa Fe Fire Protection District has reviewed and approved the buffer design. Easements will be placed over these areas to ensure these limitations are enforceable.

This buffer arrangement has been made in response to comments about the EW and RPO. The DSEIR has been modified to reflect these changes. The above noted changes represent minor modifications to the project design and clarify or strengthen measures already in place and presented in the DSEIR. Determinations about the significance of impacts do not change and mitigation measures identified in the DSEIR still apply and. As a result, the conclusions of the DSEIR do not change. These minor revisions to the project design will further diminish effects of noise, lighting, and potential intrusions on the open space because uses will be farther away from the EW. The volleyball court will be slightly farther away from the eastern boundary, so no additional noise or visual effect would occur. The volleyball court, as before, will not be lighted. The proposed changes do not therefore constitute significant new information that might deprive the public of meaningful comment and recirculation of the DSEIR is not required.

General Response 3: Traffic, Parking, and Queuing

Comments assert that the traffic study for the project does not use appropriate methodologies. The traffic analysis for the project uses methodologies from San Diego Area Government (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. These methodologies provide widely accepted standards for analyzing traffic impacts. Alternative methodologies are available and have been offered as a more accurate indication of traffic impacts. These were analyzed by the project's traffic engineers and it was found that they result in similar conclusions about traffic impacts. See Letter C attachment from Coast Law Group and the County's responses.

Comments assert that extensive off-site parking will result because not enough parking has been provided on-site. Parking requirements are determined using the County's Zoning Ordinance. Section 6764 is specific to the civic use proposed by the project, calling for 0.25 parking spaces per person. Assuming a maximum capacity of 1,500 seats, this amounts to 375 parking spaces. The project provides 417 spaces, 37 more than required. An overflow parking area is also provided. This approximately 650 by 60 foot area could accommodate over a 100 additional parking spaces if needed. Parking requirements will also be reduced because the church will operate a shuttle from points in the community to the Church. Church members will also be asked not to use off-site parking. Due to the excess parking capacity provided and operational measures, off-site parking will be minimal.

Comments assert queuing on public streets will impact the fire station operations and clog public streets. Queueing and traffic operations were considered as part of the traffic impact analysis. As detailed on pages 3-104 and 3-105 of the DSEIR, an operational analysis to evaluate the vehicular queue was performed at the Project Driveway/Four Gee Road and Four Gee Road/Camino Del Sur intersections. The proposed improvements at the intersection of Four Gee Road and Camino Del Sur (as part of the Camino Del Sur widening projects) are accounted for in the operational analysis. The operations analysis is based on vehicle queuing for high demand movements at these intersections.

The 95th percentile queue was reported. This analysis provided a basis for estimating the future storage requirements at these intersections. The future queue estimates were provided in Table 3.1-28, Future Queue Analysis, of the DSEIR.

The operations analysis indicates that the estimated maximum vehicle queue for the southbound leg at the intersection of Four Gee Road and Camino Del Sur would not exceed the capacity. The estimated maximum vehicle queue for the southbound leg at the intersection of Four Gee Road and Camino Del Sur would, at times, exceed the capacity prior to traffic signal installation. To ensure that fire station operations will not be impeded, the project will be required to implement mitigation measures M-HZ-1 as a condition of project approval. This mitigation measures ensures unimpeded fire service response by requiring the intersection of Four Gee Road and Grace Way shall 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.

Access to the La Viña community is located south of the Project site and is accessed via Tallus Glen. Tallus Glen intersects Four Gee Road north of Camino Del Sur. As discussed above, the future signal at the Project driveway on Four Gee Road will interconnect with the signal at Four Gee Road and Camino Del Sur to ensure coordinated operation. The intersection of Four Gee Road and Camino Del Sur will operate at an adequate level of service. Excessive queuing along Four Gee Road was not identified during the analysis. Project design locates a circular drop-off drive over 450 feet from the project entrance, allowing a substantial area for on-site queuing. The drive is 26 feet at its most narrow, which will allow two lanes for passenger drop-off. Cross traffic at the entrance will be minimized because the roadway for the project forms a loop around the buildings. As a result of these design features, ingress and egress issues at the La Viña community are not anticipated. Impacts would be less than significant.

General Response 4: Visual Resources

The major visual change on the site would be a transition from a widespread groupings of tall trees to a lower profile of buildings and trees. The project would result in the construction of elements within the landscape that would be compatible with the existing visual character of the community in terms of architecture, materials, color, and landscaping. The landscape plan provides a unified and attractive design because it is consistent throughout the site, provides both a unifying and a screening function, and

“shelters” the site with an attractive canopy of native and non-native trees found in the area. Muted roof and building colors would also help with a blending effect. The visual experience 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 suburban community. The key natural resource in the area, the biological open space to the north, is not directly impacted by the project and will continue to serve as a valuable biological, visual, and community character element. The visual pattern would change but would not be visually adverse.

In the past the house with caretaker’s residence and a small agricultural field was a distinctive island of rural development in an otherwise undeveloped area of open land. Over the years the visual character of the area changed. The 4S Ranch Specific Plan brought a major suburban overlay to the region, currently providing residences for 13,052 households and numerous supporting uses, including commercial centers, schools, and churches. For example, the houses to the east of the site were built when the site was still a farming operation, thereby introducing land use changes to the area that have continued through the present. The development of Salviati Homes in 2003 brought further suburban development to the area to the north. The suburbanizing effect of 4S Ranch brought development along Rancho Bernardo Road, which passes near the site on the southeast. More recently, the development of Black Mountain Ranch North Village to the southwest has been built in support of the residential influx from the south, east and along Camino Del Sol to the west. Public services naturally followed, one of which is the Santa Fe Fire Department training station on Four Gee Road across from the site. Another is the Sheriff’s substation on Rancho Bernardo Road near the southeast corner of the site. The purchase of land by the Poway Unified School District for a future school site north and west of the site represents another step in that transition. Meanwhile open space was created on the north and west, precluding expansion of the farm and further isolating the rural use of the site. In the process of change all around it, the farm site began to appear less and less visually consistent. The project preserves the open space to the north and has a minor impact to open space on the west. Buffers and design considerations have been employed to minimize indirect effects.

PUBLIC COMMENTS AND RESPONSES