



THE CITY OF SAN DIEGO

ENVIRONMENTAL IMPACT REPORT

Project No. 636444
SCH No. 2021100394

SUBJECT: All Peoples Church: The project consists of the development of a 54,476-square-foot (SF) sanctuary/multi-purpose building (under one roof) and a 71,010 SF two-level parking garage (367 parking spaces). The project site is a 5.99-acre parcel located at the northeast corner of Interstate 8 (I-8) and College Avenue of the Navajo Community Plan area. The vacant site is outside the City's Multiple Species Conservation Program (MSCP) preserve, the Multi-habitat Planning Area. The proposed project would include a 900-seat church with accessory uses (i.e., Sunday school classrooms, offices, and a multipurpose room/gym), a parking structure and surface parking, site improvements, and off-site improvements to College Avenue. Of the 900 seats, 587 seats would be fixed in place, and 3,690 SF would accommodate the remaining non-fixed seats. Congregation gatherings would primarily occur on Sundays; small group activities may occur during the weekdays or on Saturdays. No primary educational school spaces are proposed as part of the project. The project would also include on-site water quality basins to treat stormwater runoff and a sewer/stormwater connection to existing City facilities. The project would require City approval of a Community Plan Amendment (CPA) to modify the Navajo Community Plan, Planned Development Permit (PDP), Site Development Permit (SDP) and various easement vacations via the Process 5 process. (LEGAL DESCRIPTION: Portion of Lot 67 of Rancho Mission of San Diego, County of San Diego, State of California, as described in grant deed November 3, 1975, at document 76-306249) **The site is not included on any Government Code listing of hazardous waste sites.** APPLICANT: Kendall Laughlin, All Peoples Church

UPDATE: July 31, 2023. Clarifications, revisions, additional information, and/or typographical corrections have been made to the final Environmental Impact Report when compared to the draft environmental document. In accordance with California Environmental Quality Act (CEQA) Section 15088.5, the addition of new information that clarifies, amplifies, or makes insignificant modifications and would not result in new impacts or new mitigation does not require recirculation.

Pursuant to CEQA Guidelines Section 15088.5 (a): “Significant new information” requiring recirculation includes, for example, a disclosure or additional data or other information showing that:

- 1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.**
- 2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.**
- 3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the projects proponents decline to adopt it.**
- 4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.**

The modifications made to the final environmental document do not affect the analysis or conclusions of the Environmental Impact Report. All revisions are shown in a strikethrough and/or underline format.

ENVIRONMENTAL DETERMINATION:

This document has been prepared by the City of San Diego’s Environmental Analysis Section under the direction of the Development Services Department and is based on the City’s independent analysis and conclusions made pursuant to California Environmental Quality Act (CEQA) Statutes Section 21082.1 and San Diego Land Development Code Sections 128.0103(a) and 128.0103(b).

Based on the analysis conducted for the project described above, the City of San Diego, as the Lead Agency, has prepared the following Environmental Impact Report. The analysis addressed the following issue area(s) in detail: **Land Use, Biological Resources, Historical Resources, Noise, Visual Effects and Neighborhood Character, and Tribal Cultural Resources (TCRs)**. The Environmental Impact Report concluded that the project would result in significant but mitigated environmental impacts to **Biological Resources, Historical Resources; Noise; and TCRs**. All other impacts analyzed in the draft EIR were determined to be less than significant.

The purpose of this document is to inform decision-makers, agencies, and the public of the significant environmental effects that could result if the project is approved and implemented, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

PUBLIC REVIEW DISTRIBUTION:

The following agencies, organizations, and individuals received a copy or notice of the draft Environmental Impact Report and were invited to comment on its accuracy and sufficiency. Copies of the Environmental Impact Report, the Mitigation Monitoring and Reporting Program

and any technical appendices may be reviewed in the offices of the Development Services Department, or purchased for the cost of reproduction.

State of California

State Clearinghouse

City of San Diego

Central Library (81A)

Benjamin Branch Library (81D)

Other Interested Groups, Organizations, and Individuals

US Fish & Wildlife Service (23)

California Dept. of Fish & Wildlife (32)

Sierra Club (165)

San Diego Audubon Society (167)

Mr. Jim Peugh (167A)

California Native Plant Society (170)

Endangered Habitats League (182A)

Historical Resources Board (87)

Carmen Lucas (206)

South Coastal Information Center (210)

San Diego Archaeological Center (212)

Save Our Heritage Organisation (214)

Ron Christman (215)

Clint Linton (215B)

Frank Brown – Inter-Tribal Cultural Resources Council (216)

Campo Band of Mission Indians (217)

San Diego County Archaeological Society, Inc. (218)

Native American Heritage Commission (222)

Kumeyaay Cultural Heritage Preservation (223)

Kumeyaay Cultural Repatriation Committee (225)

Native American Distribution (225 A-S)

Caltrans District 11 (31)

University of California San Diego Library (134)

Navajo Community Planning Group (336)

San Carlos Area Council (338)

Del Gardens Senior Social Club (339)

Mission Trails Regional Park (341)

Malcolm A. Love Library (457)

Daily Aztec (459)

Richard Drury

Stacey Osborne

John Stump

Mark Nelson

Larry Dawon

Kris Dill
Josh Billauer
Linda Thompson
Christina Callahan
Sandra Einstein
Lesile Reinbold
Geraldine Luna
Adam Hertel
Michael Livingston
Amy E. Waczek
Teri Frazier
Katie Williams
Dana Stewart
Jordan and Alex Chaim
Steve Behar
Jerett Sigrist
Robin Kastner
Valerie Bale
Mike Irick
Frank Cavnignac
Marion Luebbermann
Donna Valerie
Barbara Rose
Steve Colombel
John Larry Granger
Mardine Davis
Jaclyn walker
Bryan Stephens
Isabela Rodriguez
Lee Fuhr
Joseph Schafstall
Isabela Rodrigues, Esq.
Lee Fuhr
Ann Stice
Kathleen Bruton
Karen and Scott Miller
April Brice
Ronald Cantor
Lyndy Cuevas
Marchelle Egleys Sparks
Robert Martin
Vicki Tilton
Mike Murray
Deanne Plamer

RESULTS OF PUBLIC REVIEW:

- () No comments were received during the public input period.
- () Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary and the letters are incorporated herein.
- (X) Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.



Courtney Holowach
Senior Planner
Development Services Department

August 31, 2022
Date of Draft Report

July 31, 2023
Date of Final Report

Analyst: Courtney Holowach

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ALL PEOPLES CHURCH

FINAL ENVIRONMENTAL IMPACT REPORT

1. INTRODUCTION

Letters of comment to the Draft Environmental Impact Report (DEIR) were received from a number of agencies, organizations, and individuals (see below table) during the 45-day public review from August 31, 2022, to October 17, 2022. There were 156 comment letters and/or e-mails received by City Development Services Department (DSD) during the DEIR public review period and seven late letters were received after the public review period closed at 5 p.m. on October 17, 2022.

Comments that address environmental issues related to the DEIR are addressed in full. In some cases, comments resulted in minor corrections to the DEIR or additional information being provided for clarification purposes. Comments that (1) do not address the adequacy or completeness of the DEIR; (2) do not raise environmental issues; or (3) do request the incorporation of additional information not relevant to environmental issues, do not require a response, pursuant to CEQA Guidelines Section 15088(a). Individual comments within each letter are bracketed and subsequently numbered in the margin of the comment letter. Bracketed/numbered comment letters are placed before the responses to the letter.

Information provided in the response to comments (RTC) clarifies, amplifies, or makes minor modifications to the DEIR. Minor clarifications have been made to the information contained in the DEIR as a result of the RTC and are reflected in the Final EIR (FEIR) by strikeout (deleted) and underline (inserted) markings. No significant new information has been added that would require recirculation of the document, per CEQA Guidelines Section 15088.5.

**Table RTC-1
LIST OF COMMENTING AGENCIES, ORGANIZATIONS, AND INDIVIDUALS**

Letter	Commenter	Date	Page
Agencies			
A1	California Department of Fish and Wildlife (CDFW)	October 14, 2022	RTC-20
A2	California Department of Transportation	October 14, 2022	RTC-28
Organizations			
O1	Campo Band of Mission Indians	September 7, 2022	RTC-30
O2	San Diego County Archaeological Society	October 10, 2022	RTC-31
O3	Navajo Community Planners	October 12, 2022	RTC-32
Individuals			
I1	Summer Adleberg	October 16, 2022	RTC-41
I2	Stephanie Ballinger	October 17, 2022	RTC-43
I3	Janice Baranski	October 8, 2022	RTC-45
I4	Steve Behar	September 1, 2022	RTC-46

Letter	Commenter	Date	Page
I5	Linda and Michael Bennett	October 12, 2022	RTC-47
I6	John Benz	October 17, 2022	RTC-49
I7	Deborah Black	October 11, 2022	RTC-50
I8	Dennis Black	October 16, 2022	RTC-51
I9	Benjamin Bloom	October 10, 2022	RTC-54
I10	Peggy Bocko	October 7, 2022	RTC-55
I11	Katie Booth	October 17, 2022	RTC-56
I12	Chip Brent	October 17, 2022	RTC-57
I13	Cameron Bresnick	September 7, 2022	RTC-58
I14	Janis Brown	October 14, 2022	RTC-59
I15	Christina Callahan	October 17, 2022	RTC-60
I16	Elaine Camara	October 4, 2022	RTC-61
I17	Gregg Cantor	October 16, 2022	RTC-62
I18	James Carry	October 15, 2022	RTC-63
I19	Jordan Chaim	October 13, 2022	RTC-64
I20	Shari and Joseph Colloca, Robin Kastner, Maureen Champion, Rosemary and Victor Ghosn, Adeline and Yann Renard, Hortencia and Ted Bendrick, Wendy and Dustin Jones, Amy and John Pecoraro, Kathy and Bill Connell, Diana and Rich Sanderson, Deborah and Dennis Black, Danielle Black, Kelly and Matt Rookus, Denine and Larry Dawson, Stephanie and Chad Summers, Sara Moten and Karla and Dan DeCoursey, Christine and Ryan Dammann	October 17, 2022	RTC-65
I21	Steve Colombel	October 9, 2022	RTC-76
I22	Eddie and Adriana Cuadal	October 7, 2022	RTC-77
I23	Christine Dammann	October 17, 2022	RTC-78
I24	Konrad Davis	October 8, 2022	RTC-79
I25	Mardine Davis	October 11, 2022	RTC-80
I26	Larry Dawson	October 3, 2022	RTC-82
I27	Lew Dawson	October 17, 2022	RTC-83
I28	Lauren Degheri	October 14, 2022	RTC-89
I29	Kendra DeGroot	October 17, 2022	RTC-90
I30	Maria DeLeon	October 11, 2022	RTC-91
I31	Nadine Desteunder	October 9, 2022	RTC-92
I32	Scott Dickson	October 16, 2022	RTC-93
I33	June Dodge	October 16, 2022	RTC-94

Letter	Commenter	Date	Page
I34	Bruce Doole	October 4, 2022	RTC-96
I35	Martin Doucett	October 8, 2022	RTC-97
I36	David Einstein	October 8, 2022	RTC-98
I37	David Endow	October 17, 2022	RTC-99
I38	Gene Erquiaga	October 15, 2022	RTC-100
I39	Ryan Evenson	October 5, 2022	RTC-101
I40	James Forbes	October 6, 2022	RTC-102
I41	Teri Frazier	October 14, 2022	RTC-103
I42	Beth Friedenber	October 14, 2022	RTC-104
I43	Lee Fuhr	September 2, 2022	RTC-105
I44	Marie Garcia	October 16, 2022	RTC-106
I45	Jean and Franklin Gaylis	October 2, 2022	RTC-107
I46	Cap Geis	October 6, 2022	RTC-109
I47	Laura Gingras	October 17, 2022	RTC-110
I48	John Larry Granger	October 16, 2022	RTC-111
I49	Toni and Allen Gruber	October 16, 2022	RTC-112
I50	Lesley Halpern	October 16, 2022	RTC-113
I51	Bryan Harris	October 10, 2022	RTC-114
I52	Shain Haug	September 17, 2022	RTC-115
I53	Marilyn Hinck	October 7, 2022	RTC-120
I54	Jeff Hinck	October 11, 2022	RTC-121
I55	Jon Hoidal	October 17, 2022	RTC-122
I56	John Hood	October 16, 2022	RTC-123
I57	Aleyda Hoskins	October 4, 2022	RTC-125
I58	Redelle Hrastich	October 8, 2022	RTC-126
I59	Loretta Huckabone	October 15, 2022	RTC-127
I60	Loretta Huckabone	October 16, 2022	RTC-128
I61	Sharon Hudnall	October 7, 2022	RTC-129
I62	Sharon Hudnall	October 8, 2022	RTC-130
I63	Jeffrey and Michael Hunt	October 7, 2022	RTC-131
I64	Cheryl Irick	October 16, 2022	RTC-133
I65	Donna Janzen	October 6, 2022	RTC-135
I66	Vivienne Jarvis and Joe Shapiro	October 16, 2022	RTC-137
I67	Dave Jones	October 17, 2022	RTC-138

Letter	Commenter	Date	Page
I68	Candy Kalman	September 22, 2022	RTC-139
I69	Lia Jones-Karavokiris	October 6, 2022	RTC-140
I70	Karen Kawamoto	October 14, 2022	RTC-141
I71	Rebecca Kawamoto	October 14, 2022	RTC-144
I72	Robert Kawamoto	October 14, 2022	RTC-146
I73	David and Claudia Kay	October 17, 2022	RTC-149
I74	Allyson Kelley	September 27, 2022	RTC-151
I75	Danielle Kerr	October 17, 2022	RTC-152
I76	Anne and Mohsin Khan	October 11, 2022	RTC-153
I77	Michael Kinnamon	October 12, 2022	RTC-154
I78	Derek and Lily Kinninger	October 7, 2022	RTC-155
I79	George Kirazian	October 7, 2022	RTC-157
I80	Sarah Knoepfli	October 11, 2022	RTC-158
I81	Daniel Kroeger	October 16, 2022	RTC-160
I82	Erik Larson	October 4, 2022	RTC-161
I83	Trish Larson	October 4, 2022	RTC-162
I84	Bob and Jane LeRibeus	October 10, 2022	RTC-163
I85	Phillippe and Natascha Lesage	October 3, 2022	RTC-164
I86	Aaron Levine	October 16, 2022	RTC-166
I87	Lacey Levitt	October 4, 2022	RTC-167
I88	Zita Liebermensch	October 11, 2022	RTC-168
I89	Michael Livingston (Save Del Cerro)	October 17, 2022	RTC-169
I90	Meaghan Loud	October 16, 2022	RTC-174
I91	Michael Lovci	October 14, 2022	RTC-175
I92	Mark Luciano	October 13, 2022	RTC-177
I93	Sandy Luebben	October 10, 2022	RTC-178
I94	Stephanie Macceca	October 16, 2022	RTC-179
I95	Thomas Marshall	September 17, 2022	RTC-181
I96	Robert Martin	October 10, 2022	RTC-186
I97	Anne McColl	October 16, 2022	RTC-187
I98	Medina Family	October 3, 2022	RTC-188
I99	David Mendel	October 14, 2022	RTC-190
I100	David Mendel	October 14, 2022	RTC-191
I101	Julie Middlemas	October 14, 2022	RTC-192

Letter	Commenter	Date	Page
I102	Vince Mikulanic	October 17, 2022	RTC-193
I103	Michael Miller	October 7, 2022	RTC-195
I104	Scott and Karen Miller	October 9, 2022	RTC-196
I105	Patricia Mooney	September 20, 2022	RTC-197
I106	Camellia Mortezaadeh	October 16, 2022	RTC-198
I107	Ryan Mosher	October 9, 2022	RTC-199
I108	J.G. Ney	October 17, 2022	RTC-200
I109	Jackie O'Connor	October 16, 2022	RTC-202
I110	Vince Outlaw	October 14, 2022	RTC-203
I111	Rosaura Picasso	October 14, 2022	RTC-204
I112	Michael Poltorak	October 7, 2022	RTC-205
I113	Bill Poulin	October 11, 2022	RTC-206
I114	Irma Poulin	October 11, 2022	RTC-207
I115	David Preciado	October 16, 2022	RTC-208
I116	Julie, Kevin and Kate Prichard	October 4, 2022	RTC-212
I117	Barbara and Jim Recht	October 10, 2022	RTC-213
I118	Mark Remer	October 9, 2022	RTC-214
I119	Stacy Roberts	October 16, 2022	RTC-215
I120	Sheryl Schultz Rose	October 16, 2022	RTC-217
I121	Jeffrey Rosenblatt	October 7, 2022	RTC-219
I122	Rachel Rothman	October 11, 2022	RTC-220
I123	Daniel Saltzman	October 15, 2022	RTC-221
I124	Diana Sanderson	October 16, 2022	RTC-222
I125	Abel Santana	October 17, 2022	RTC-223
I126	Mark Sauer and Donna Valerie	October 12, 2022	RTC-226
I127	Amy Schindler	October 8, 2022	RTC-228
I128	Mark Schulze and Patty Mooney	October 11, 2022	RTC-229
I129	Noah Schuster	October 16, 2022	RTC-230
I130	David Schwartz	October 15, 2022	RTC-231
I131	Cindy Scott	September 2, 2022	RTC-233
I132	Kevin Sheedy	October 10, 2022	RTC-234
I133	Shannon Shepley	October 17, 2022	RTC-237
I134	Charles Sloan	September 12, 2022	RTC-238
I135	Andrew Slotter	October 4, 2022	RTC-239

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I136	Jaime and Art Smart	September 9, 2022	RTC-240
I137	Jaime Smart	October 14, 2022	RTC-241
I138	Cheryl Smelt	October 16, 2022	RTC-242
I139	Lauren Sommer	October 16, 2022	RTC-243
I140	Sabine Steck	October 7, 2022	RTC-244
I141	Nathan Stein	October 16, 2022	RTC-245
I142	Lisa Stein	October 17, 2022	RTC-248
I143	Dana Stewart	October 11, 2022	RTC-250
I144	Kurt and Susan Stormberg	October 9, 2022	RTC-251
I145	Judy Swinko	October 13, 2022	RTC-252
I146	Jim Treglio	October 16, 2022	RTC-254
I147	Christine van Spronsen	October 16, 2022	RTC-255
I148	Jon Wiggins	October 17, 2022	RTC-256
I149	Brain Woolsey	October 16, 2022	RTC-257
I150	Evan Youngstrom, Lewis and Sarah Dawson, Judith Abegglen, Susan and Hailey Andrews, Lisa Busalacchi, Goncalo and Nancy Gloria	October 16, 2022	RTC-258
Late Letters^a			
L1	Paula Berberick	October 20, 2022	RTC-262
L2	Christine and Ryan Dammann and Shannon Shepley (via Joe Colloca)	October 17, 2022	RTC-263
L3	Cathleen Elmies	October 17, 2022	RTC-275
L4	Theresa Golden	October 18, 2022	RTC-276
L5	Annemarie Penick	October 17, 2022	RTC-277
L6	David and Celeste Schwartz	October 17, 2022	RTC-278

^a The following letters were received after the DEIR public review period closed on October 17, 2022, at 5 p.m.

2. MASTER RESPONSES

The following master responses have been provided in order to address common themes or issues that were raised throughout the comment letters received during public review of the DEIR. These master responses are commonly referred to throughout the specific responses to comments received by agencies, organizations, and individuals.

Master Response 1: Project Alternatives

The City received comments stating that the project would be better suited at another location or that another use would be preferred on the project site. Specifically, commenters suggested that the site be developed with the previously approved Marburn Corporation residential subdivision (which is discussed as a project alternative in DEIR Chapter 8, *Project Alternatives*), low-density residential, affordable homes, or some other housing project as an alternate use of the project site. Other uses identified by commenters included conversion to open space or green space, a City, dog or community park area, a shopping center with apartments or condominiums, or a tiny home village for the homeless. Suggestions to keep the site vacant were also made in comments. This Master Response has been prepared to address those comments.

According to CEQA Guidelines Section 15126.6, “An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project ...” Additionally, “... an EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.”

Residential Use

DEIR Chapter 8, *Project Alternatives*, analyzed the environmental impacts of the previously approved Marburn Corporation residential subdivision in DEIR Section 8.4.2. The Marburn Corporation residential subdivision, identified as the Reduced Residential Development Alternative, would result in similar environmental impacts as the church project. Specifically, the environmental impacts to biological resources, historical resources, noise, and tribal cultural resources caused by simply grading the project site would be significant and mitigable under the Reduced Residential Development Alternative, the same level of significance as those impacts associated with the project. Likewise, the amount of traffic produced by the subdivision would be similar to that of the weekday trips associated with the church, as disclosed in DEIR Section 8.4.2.1. The Marburn Corporation residential subdivision was predicted to generate 260 daily trips, which would be under the 300 VMT screening threshold identified in the Transportation Study Manual, similar to the proposed project. Additionally, land use, visual effects and neighborhood character impacts associated with the Reduced Residential Development Alternative would be less than significant, similar to the project. Other variations of a residential use, such as low-density residential, affordable homes or a tiny home village, would result in similar physical impacts as the Reduced Residential Development Alternative and the project, because a similar grading footprint would be required to implement those alternative residential uses. Nevertheless, the Reduced Residential Development Alternative, and any other residential alternative, is not considered feasible because it would not attain the

primary objectives of the project related to placing the church/sanctuary in a central San Diego location on church-owned property that has proximity to its existing congregation; establishing a place of worship that would accommodate the existing and future space needs; and fulfilling the institution's religious mission (identified in DEIR Chapter 3, *Project Description*), nor would it substantially lessen any of the significant effects of the project.

Other Land Uses

As discussed in DEIR Section 8.3.2, converting the project site to another land use other than a church, such as open space or developing the property as a park, would be inconsistent with the intent of the General Plan, Community Plan, and underlying zoning, which all anticipate development on the site in the future. Any of these options would prevent an infill site with access to utilities, public services, and transit from being developed contrary to the City's stated planning goals. Moreover, none of the alternative land uses, such as dog or community park area, a shopping center with apartments or condominiums, or a tiny home village for the homeless, would achieve any of the primary project objectives as outlined in DEIR Sections 3.1 and 8.2.1.

Alternative Locations

In accordance with CEQA Guidelines Section 15126.6(f)(2)(A), alternative locations for the project would be considered if "any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR." Factors that need to be considered when identifying an off-site alternative include the size of the site, its location, the General Plan (or other applicable planning document) land use designation, availability of infrastructure, and whether or not the applicant can reasonably acquire, control, or otherwise have access to the alternative site. It should be noted that the availability of an alternative site does not in and of itself reduce the project's impact potential.

Currently, All Peoples Church occupies several rented (not owned) buildings at 5555 University Avenue in the Mid-City community, approximately 2.5 miles south of the project site. As renters, the church does not own or control the buildings it currently occupies and the church's current facilities are a part of the Chollas Triangle Park redevelopment plan (<https://www.sandiego.gov/cip/projectinfo/featuredprojects/chollas-triangle-park>). The church's existing location and nearby communities are already highly developed, and as a result, available sites of sufficient size in the area are not common. Site ownership and site design are important aspects of the site selection for the applicant, so that the facility can fully express design features that support the religious nature of the facility. Therefore, continuing to rent space is not a realistic option.

The applicant conducted an extensive survey of area properties before purchasing the land for the project, and the proposed location was found to best fit its needs. The applicant does not currently own any other similarly sized undeveloped or developed parcels within the project area, and the applicant cannot reasonably acquire, control, or otherwise have access to a sufficiently sized alternative site within the communities it serves. Developing the project on any of the sites suggested by the comments may result in new or more severe significant impacts that would not occur at the project site because a currently developed site could be closer to sensitive receptors or be on level terrain with residential development, thereby increasing the potential intensity of project

effects. Moreover, sites in the vicinity that are undeveloped are farther from the congregation and are frequently located in environmentally sensitive locations, such as steep hillsides or on properties with highly sensitive biological resources.

Some comments suggested alternate locations for the proposed church, including properties the church does not own or control or are outside of the City's jurisdictional boundaries, such as the vacant Fry's Electronics building in Serra Mesa, the vacant Macy's Parkway Plaza Mall in El Cajon, vacant buildings on Fletcher Parkway and in Grossmont Center in La Mesa, and other unspecified locations with nearby freeway access. The proposed location is located in San Diego and is relatively proximate (to the church's existing congregation, which is an objective of the project as noted in DEIR Section 3.1.1). For these reasons, an alternate location for the project site was not analyzed in DEIR Chapter 8, *Project Alternatives*, and no additional analysis is required at this time.

Master Response 2: Cumulative Impacts

The City received comments stating that the cumulative impact scenario used in DEIR Chapter 6, *Cumulative Impacts*, was incomplete because it should have included a ministerial development (PRJ-1061051, Del Cerro House) located at 6353 Del Cerro Boulevard east of College Avenue whose application was deemed complete by the City seven months after the Notice of Preparation (NOP) of an EIR for the All Peoples Church project was published October 22, 2021. This Master Response has been prepared to address those comments.

According to CEQA Guidelines Section 15130, the discussion of cumulative effects should be guided by the standards of practicality and reasonableness. "The evaluation of cumulative impacts is to be based on either: (A) a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or (B) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative effect". Furthermore, as stated in CEQA Guidelines Section 15125: "An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published".

Pursuant this guidance in CEQA, a plan approach was taken in the DEIR given the built-out and developed nature of the Navajo Community Plan area and, specifically, the Del Cerro neighborhood. When using the plan approach, a DEIR need not also consider other reasonably foreseeable projects in the area, as suggested in the comments. Instead, the cumulative effects of the project described in DEIR Chapter 6 are appropriately considered in the context of the General Plan and Navajo Community Plan buildout, as well as the nearby Adobe Falls portion of the SDSU Campus Master Plan.

Furthermore, the DEIR's environmental baseline was defined when the City published and circulated the All Peoples Church NOP on October 22, 2021. The application for the Del Cerro House project was deemed complete on June 27, 2022, seven months after the baseline condition was established in accordance with CEQA Guidelines Section 15125. As demonstrated in the DEIR, the cumulative

impacts analysis is valid and appropriate given its compliance with the CEQA Guidelines and standard City procedures. Therefore, the DEIR adequately addressed the potential for cumulative impacts consistent with CEQA Guidelines Sections 15125 and 15130 and the City's standard practice for setting environmental baseline conditions.

Master Response 3: Land Use

The City received comments on the DEIR's conclusion that the project would result in a less-than-significant land use impact contained in DEIR Section 5.1. In addition, the City received comments noting that the project site is included on the City of San Diego Housing Element Adequate Sites Inventory (Inventory) with the potential for the construction of 49 to 52 units. Commenters also assert that the City will be unable to meet its housing needs without the development of those housing units onsite. This Master Response has been prepared to address those comments, and revisions to DEIR Section 5.1, *Land Use*, and Tables 5.1-1 and 5.1-2 have been implemented in the FEIR to clarify that the CPA is a General Plan process and that certain residential land use policies from the Navajo Community Plan are not applicable to the project and have been removed.

Land Use Policy Consistency

As explained in revised DEIR Section 5.1, the project is consistent with the intent of the General Plan and the Navajo Community Plan. The Navajo Community Plan identifies the three "overriding" objectives for the long-range development of the community (Introduction-Preface, page 1): (1) retention of the residential character of the area; (2) provision of adequate community services, such as police and fire protection, rubbish collection, etc.; and (3) establishment of guidelines for the utilization of canyons and hillsides and enhance the environment of the area as a pleasant community in which to live.

The project does not include a residential component; it instead proposes the development of a church, a community service that the Navajo Community Plan acknowledges as a local community facility land use on Figure 24. As noted in revised DEIR Section 5.1, the project requires the approval of a Community Plan Amendment to add a new "church" use to the Other Community Facilities: Exhibit 24 in the Community Plan, as is the case for other religious institutions in the community since the City's planning documents do not provide a separate land use designation or zone for churches or places of religious assembly. The project site will continue to retain the Single Family residential land use designation on the Navajo Community Plan Land Use map (Figure 4) and the property will continue to be residentially zoned (RS-1-7). The applicant's Community Plan Amendment would change the site use to allow for religious assembly. Pursuant to San Diego Municipal Code (SDMC) Section 126.0602 (a) (2), the proposed Planned Development Permit allows the applicant to propose a use that "complies with the applicable land use plan but contains uses that are not permitted in the underlying base zone." Thus, the project use would be consistent with the Navajo Community Plan.

Moreover, DEIR Section 5.5 discloses that the project's massing and architectural style would be distinctive from that of the surrounding one-story, ranch-style homes in the vicinity. As recommended in the Community Plan Residential Element policies, the project design is sensitive to the existing neighborhood as the church/sanctuary structure has been situated in the topographic low point of the site near the College Avenue/I-8 westbound off-ramp and set back from the

adjacent, lower profile residential and commercial structures to the east and north; would feature extensive landscaping, including screening along the common property line with the nearby residential yards to conceal and soften views of facilities, walls and rooftops; would produce a positive visual appearance through its comprehensive design from public vantage points along local roads/freeway that surround the site; and it would screen or conceal parking areas and on-site retaining walls with landscaping or structures from public vantage points along local roads/freeway. The project also complies with Circulation Element policies with the implementation of College Avenue frontage improvements, including a signalized intersection, an upgraded sidewalk, pedestrian linkages into the site, and striping to create a bike lane.

Regarding the Community Plan objective related to canyon and hillsides and development enhancing the environment “as a pleasant place in which to live”, DEIR Section 5.5.6, *Landform Alteration*, notes that no naturally occurring steep slopes or natural topography occur on the project site. The project design, therefore, as described in DEIR Chapter 3, *Project Description*, and Section 5.5, *Visual Effects and Neighborhood Character*, focuses on reducing potential conflicts with adjacent residential uses. Refer to Master Response 4 regarding neighborhood character for additional discussion on this topic.

Also, refer to revised Table 5.1-1, *City of San Diego General Plan Land Use Goals, Objectives, and Policies Consistency Evaluation*, and revised Table 5.1-2, *Navajo Community Plan Goals and Recommendations Consistency Evaluation*, in DEIR Section 5.1.3 for a comprehensive and thorough analysis of the project’s consistency with applicable General Plan and Community Plan policies. General Plan and Community plan policies regarding the CPA and residential nature of the site have been removed using strikethrough changes in the FEIR.

Regional Housing Policy Consistency

Appendix D to the Housing Element Adequate Sites Inventory, which identifies the project site as having the potential for 49 units, includes the following preface (page HE-D-1): “Inclusion of a site on this list does not indicate that a site will be developed or redeveloped or will be required by the City to develop or redevelop with housing ... it indicates that the site has unrealized capacity for housing, based on its zoning and/or land use designation in the applicable community plan, that could reasonably be realized during the 2021–2029 period. The Adequate Sites Inventory assists in meeting the State law that requires that each jurisdiction demonstrate enough zoned housing capacity to meet each Housing Element Cycle’s Regional Housing Needs Allocation (RHNA).” The Inventory further explains that it is based upon a broad survey of potentially developable land and acknowledges that “many factors affect housing development feasibility, trends, and developer and property owner choices within the City, and that the City cannot mandate housing development on private property or property owned by other government agencies.”

Recent modifications to Housing Element law adopted through Senate Bill (SB) 1333 and amended Government Code Section 65356, known as the “No Net Loss” provisions, require the City to monitor housing production during the eight year planning period for the Housing Element to ensure that the City maintains housing capacity to meet its RHNA target. The City, therefore, in preparing its Adequate Sites Inventory, made conservative estimates of site capacity (90% of the net potential housing units based on the zone/land use designation) and identified enough sites to provide a substantial (61%–62%) buffer above its RHNA targets to ensure that the City can meet its targets.

Moreover, the City monitors its Housing Element Inventory regularly through the Housing Element planning period to ensure sufficient housing capacity exists and the City also identifies opportunities to increase housing capacity in a manner consistent with the General Plan and Climate Action Plan.

As a result, the project will not ultimately affect the City's overall housing capacity because the Housing Element Adequate Sites Inventory includes a substantial buffer and the project site will retain the Single Family residential land use designation on the Navajo Community Plan Land Use map (Figure 4) and the property will continue to be residentially zoned while the church is operational. Regardless, comments on the City's housing capacity do not pertain to the adequacy of the DEIR.

Master Response 4: Aesthetics

The City received comments expressing concern with regard to the project's visual or aesthetic compatibility with the nearby residential neighborhoods and changes to views along College Avenue at its entryway to the Del Cerro neighborhood of the Navajo Community Plan area. This Master Response has been prepared to address those comments.

Neighborhood Character

With regard to the aesthetic characteristics of the project relative to its surroundings, DEIR Section 5.5.1.5 states that the existing patterns of development in the Navajo community as a whole are predominantly one- and two-story suburban single-family residential structures, although there are several multistory multifamily, commercial, and institutional buildings interspersed throughout the area. DEIR Section 5.5.1.5 further notes that a variety of architectural styles exist in the project area, including ranch-and contemporary-style homes, commercial and institutional buildings, and concludes that there is no common architectural theme. Recognizing the lack of an architectural theme within the Navajo community is important factually toward assessing project impacts to neighborhood character, in accordance with the City's significance determination thresholds (refer to Section 5.5.4.1).

DEIR Section 5.5.4.2 acknowledges that the project's massing and architectural style would be distinctive from that of the surrounding one-story, ranch-style homes and two-story residences and commercial structures in the project vicinity. To address that potential distinction, the project was consciously designed to place the church/sanctuary building in the southernmost portion of the site near the I-8 interchange, at an elevation 30 feet below grade of and 195 feet set back from the nearest residences. This design is in direct contrast to a proposal that could have placed the church/sanctuary in the northern portion of the property at grade with the nearby homes, which would have created a more obtrusive condition. Further, as shown in the landscape concept plan in DEIR Figure 3-6, extensive landscaping is proposed to soften the project's appearance and provide buffer screening of the structures and on-site retaining walls when viewed from the nearby homes and public roads (i.e., College Avenue and I-8 interchange). The amount of landscaping would exceed the minimums required by the SDMC.

DEIR Section 5.5.4.2 applies the City's significance determination thresholds when assessing the project's impacts to neighborhood character and visual quality. As stated in the City guidelines, projects that severely contrast with surrounding character must be evaluated in the context of the

height and bulk of the existing patterns of development in the vicinity and would have to exceed those patterns of development by a substantial margin to be considered significant. In addition, the DEIR analysis references the following impact thresholds (as outlined in DEIR Section 5.5.4.1) for evaluating the project's impacts on neighborhood character. Would the project:

- Have a negative visual appearance that meets one or more of the following conditions:
 - The project would create a disorganized appearance and would substantially conflict with City codes;
 - The project would significantly conflict with the height, bulk, or coverage regulations of the zone and does not provide architectural interest; and/or
 - The project includes crib, retaining, or noise walls greater than 6 feet in height and 50 feet in length with minimal landscape screening or berming where the walls would be visible to the public.
 - Have an architectural style or use building materials in stark contrast to adjacent development where the adjacent development follows a single or common architectural theme;
 - Be located in a highly visible area (e.g., on a canyon edge, hilltop or adjacent to an interstate highway) and would strongly contrast with the surrounding development or natural topography through excessive height, bulk, signage, or architectural projections; and/or
 - Result in the physical loss, isolation or degradation of a community identification symbol or landmark (e.g., a stand of trees, coastal bluff, historic landmark) which is identified in the General Plan, applicable community plan or local coastal program.

The analysis in DEIR Section 5.5, *Visual Effects and Neighborhood Character*, broadly considers the visual characteristics of all the existing developed areas and undeveloped slopes within the viewshed that surrounds the project site, including the residential, commercial, institutional uses and open space nearby. The discussion focused on views from publicly accessible vantage points, such as local roads and the I-8 freeway, as private views are not protected by CEQA or the City. The analysis does not artificially constrain the discussion to the immediate project vicinity but takes into consideration the entire visual setting within which surrounds the site and from where changes in visual character would be visible beyond the Navajo Community area into the northern edge of the College Area community, as well as along the Interstate 8 corridor.

As described in DEIR Chapter 3, *Project Description*, and Section 5.5, *Visual Effects and Neighborhood Character*, approximately 80% of the roofline, or the vast majority of the church/sanctuary building and the parapet wall around the building, would comply with the 30-foot height limit established in the San Diego Municipal Code (SDMC). To prevent the structure from appearing box-like in appearance and to create architectural interest, three pitched roof towers are proposed to extend 15 to 18 feet above the 30-foot height limit with a single 8-foot tall cross is proposed above the 45-foot roof tower on the western elevation facing College Avenue. DEIR Figures 3-2 and 3-3 show these architectural projections.

The project proposes, as detailed in DEIR Table 3-1, *Proposed Development Deviations*, a Planned Development Permit (PDP) for the deviation to SDMC 131.0431(b) to allow for architectural

projections 53 feet above grade where 30 feet above grade is permitted. Consistent with San Diego Municipal Code (SDMC) Section 126.0605, *Findings For Planned Development Permit*, approval of the PDP requires the decisionmaker to make three findings that the project will: not adversely affect the applicable land use plan, not be detrimental to the applicable land use plan, and will comply with the regulations of the Land Development Code including any proposed deviations pursuant to Section 126.0602(b)(1) that are appropriate for this location and will result in a more desirable project than would be achieved if designed in strict conformance with the development regulations.

As noted above, the City's CEQA significance determination thresholds state that a project would have to exceed the zoning regulations by a substantial margin and present a disorganized appearance with no architectural interest to result in a significant visual character impact. That is not the situation presented here. The church is not proposed at the same topographic grade as the nearby structures, but rather would be placed in the southern portion of the site at a base elevation that would be over 30 feet lower than and set back 195 feet from the nearest residential properties. The project would feature architectural design elements, such as contemporary Spanish Colonial Revival styling with arched entrances and windows, and extensive landscaping and buffer treatments that exceed the City's standards. Collectively, these project features would combine to create visual interest, softening and screening of the project when viewed from the surrounding public vantage points, as illustrated in DEIR Figures 5.5-4a and 5.5-4b.

DEIR Section 5.5 notes that there is no consistent architectural styling or theme in the area that would be disordered by the project; however, the DEIR Section 5.5 does recognize that the project design would not resemble the low-stature residential subdivision style of the nearby neighborhood and instead would reflect the architectural styling of the SDSU academic buildings and other structures in the project area. The DEIR Section 5.5.4 analysis simply notes the relationship to the SDSU buildings, it does not rely on the presence of these other structures as a rationale for its significance determination. Rather, the analysis objectively applies the City's thresholds to the project's design and context to conclude there the project would not result in a significant neighborhood character impact.

The DEIR Section 5.5.4 indicates that the project will introduce a community service into the Del Cerro community and alter the residential character of the area. Nevertheless, the project's height, bulk, signage, or architectural projections would not result in a negative visual appearance due to its topographically-sensitive site layout, cohesive architectural styling, and below grade placement of retaining walls combined with the heavy use of screening vegetation and landscape treatments to soften its appearance from nearby public and private viewing areas. Therefore, the proposed project would not result in substantial alteration to the existing or planned character of the area, and impacts would be less than significant, as concluded in the DEIR.

Scenic Views

As stated in DEIR Section 5.5.3, there are no vistas or scenic views designated in the project area by the Community Plan or General Plan. Although public views of the project would be available from the travel lanes of College Avenue, this these vantage point is not considered scenic vistas. In addition, there are no public resources visible from public viewing areas nearby. By placing the church/sanctuary building at the topographically lowest portion of the site, the project has been designed to minimize its intrusion into the nearby public vantage points, such as College Avenue. It

should be noted that the structure would not block a view of a designated public resource from a public viewing area, such as local roads. Therefore, as stated in the DEIR, the project would not obstruct any vista or scenic views identified in the Navajo Community Plan or General Plan, and its impacts would be less than significant.

Master Response 5: Transportation

The City received comments raising concerns regarding the increase in traffic and congestion that would occur with implementation of the project. Specifically, comments raise concerns over the validity of the project's trip generation rate; suggest that the DEIR did not analyze the traffic for all of the church's programming and operations; question the scope and conclusions reached in the Local Mobility Analysis (LMA); criticize the Vehicle Miles Traveled (VMT) Assessment; and raise concerns about the operational transportation changes that would occur along College Avenue. The City also received comments questioning the San Diego Association of Governments (SANDAG) traffic forecast model adequacy in the VMT analysis as it relates to assessing direct and cumulative impacts. None of the comments provided any specific evidence supporting these claims. This Master Response has been prepared to address those comments and DEIR revisions to Chapter 3, *Project Description*, and Section 7.1, *Effects Found Not to Be Significant*, have been integrated into the FEIR to clarify the purposes of preparing the LMA and VMT Assessment.

Trip Generation Rate

As documented in the VMT Assessment and Local Mobility Analysis (LMA), respectively contained in DEIR Appendices K and J, the project trip generation was estimated for both weekday operations for the VMT CEQA review and Sunday service for the access analysis (i.e., LMA). The City's Transportation Study Manual (TSM) methodology for analyzing a regional service facility is to use a SANDAG travel demand model for the VMT analysis. However, SANDAG does not have a Sunday travel demand model and a VMT analysis is focused on weekday trips.

Project details related to the topic of trip generation are provided in both the VMT Assessment (Appendix K) and LMA (Appendix J). The project trip generation was initially estimated using City trip rate from the *Trip Generation Manual*, May 2003. Additionally, project-specific trip generation was developed using data collected from the existing All Peoples Church services at 5555 University Avenue and the anticipated expansion of staff, congregation and programs at its proposed location. The church's traffic engineer collected vehicle occupancy data (i.e., number of people per car) for four services on Sundays in November and December 2019. The observed occupancy rate was then used to estimate the number of vehicles trips based on the maximum number of seats (900) at the new location. A comparison of the City trip generation and the project-specific trips generation was conducted to identify the higher volume between the two methodologies. Although located in a Transit Priority Area (TPA), as mapped by SANDAG and adopted by the City, a transit trip reduction was not taken for either trip generation volume.

The DEIR's trip generation outlined in Section 7.1.12 and the accompanying appendices referenced therein is appropriate and valid as follows:

- 1) The weekday trip generation for the project is calculated at 263 ADT based on the project building square. The project-specific weekday trip generation based on the forecasted

weekday use of the facilities (staff, bible study, and facilities such as the gym) is estimated at 280 ADT. The higher project-specific weekday trip generation of 280 ADT was used for screening in the project's VMT Assessment and for assessing the potential for project impacts in accordance with CEQA.

- 2) The Sunday trip generation for the project is estimated at 1,052 ADT. The Sunday project-specific trip generation is calculated based on a full capacity of 900 seats using vehicle occupancy data and service attendance numbers collected by the traffic engineer resulted in a trip generation of 1,976 ADT. The higher project-specific Sunday trip generation of 1,976 ADT was used in the LMA analysis for conducting the project access analysis.

Therefore, an appropriate project trip generation was developed for the project for both weekday and Sunday operations, and weekday trip generation rates were used appropriately in the analysis of project VMT impacts under CEQA, as described in DEIR Section 7.1.12.

Local Mobility Analysis

Preparation of an LMA is required for a project that generates more than 1,000 ADT if it is consistent with Community Plan/Zoning and more than 500 ADT if inconsistent with Community Plan/Zoning. The purpose of the LMA is to identify any on- or off-site infrastructure improvements in the project vicinity that may be triggered with the development of the project, analyze site access and circulation, and evaluate the local multimodal network available to serve the project. However, vehicle delay and level of service (LOS) metrics are no longer the basis for transportation impact analysis under CEQA. The VMT analysis included in DEIR Section 7.1.12 and DEIR Appendix K analyzed the project's potential transportation VMT impacts under CEQA, as described below. To clarify that the LMA was used to identify the project's infrastructure improvements, rather than to assess project impacts under CEQA, clarifications on this topic have been implemented in Chapter 3 and Section 7.1.12 of the FEIR.

With regard to the scope of the LMA itself, the LMA dated March 2, 2022, contained in DEIR Appendix J, satisfied the requirements of the City's TSM (September 29, 2022) for analyzing project access as follows:

- 1) Weekday intersection analysis in the LMA evaluated five (5) intersections in the project area.
- 2) Weekday segment analysis in the LMA included three (3) segments.
- 3) Sunday intersection analysis included five (5) intersections.
- 4) Sunday segment analysis included three (3) segments.
- 5) Weekday and Sunday queuing analysis included through lanes on College Blvd/Main Project Access.
- 6) Queuing was also analyzed at College Ave/Del Cerro Blvd.

In addition, the collection of traffic data was completed properly. The LMA relied on pre-COVID-19 baseline traffic data, for weekday AM and PM peak hours and a Sunday AM peak hour (to match the church's service times) in July 2018.

Regarding existing off-ramp queues in the project area, the LMA addressed access in the context of I-8 off-ramp queuing for the westbound and eastbound off-ramps. The off-ramp queues do not exceed the available storage; therefore, the LMA did not identify a requirement for the project to provide interchange improvements.

The LMA used Level of Service (LOS) and vehicular delay for evaluating project access. The LMA evaluated intersection LOS, delay and queuing for weekday and Sunday scenarios under five scenarios: existing, opening year, opening year plus project, Horizon Year, and Horizon Year plus project conditions. In conclusion, the LMA was properly prepared and presents appropriate recommendations with regard to access in the project vicinity.

Vehicle Miles Traveled

According to the City's TSM (September 29, 2022), transportation VMT analysis for CEQA shall be conducted using the SANDAG Regional Travel Demand Model. The TSM lists eight screening criteria, and one of them uses weekday average daily trips (ADT) for assessing whether a detailed VMT analysis is required. The project is forecasted to generate approximately 280 weekday ADT, which satisfies the City small project criteria of less than 300 ADT. Therefore, the project is screened out from having to conduct a full VMT analysis and is presumed to have a less than significant transportation impact in DEIR Section 7.1.12. The transportation analysis contained in DEIR Section 7.1.12 and the associated Appendix J implemented the TSM methodology, accurately applied the TSM's VMT screening criteria and properly assessed the project's VMT impacts in accordance with CEQA.

Furthermore, VMT is by nature a cumulative issue, as noted in Master Response 5. The State of California Office of Planning and Research (OPR) determined in its *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR 2018) that: A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Due to the fact that VMT analysis measures the VMT efficiency of a project compared to the average VMT efficiency of the region covered by SANDAG, the regional planning agency, the geographic scope for the transportation cumulative analysis is the San Diego Region. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact.

College Avenue Operational Changes

Commenters expressed concerns that project traffic combined with the installation of a new traffic signal along College Avenue would worsen the existing traffic conditions in the community. As shown in the signalized intersection analysis section of the LMA (DEIR Appendix J), under opening year conditions with the project's weekday or Sunday traffic, the new signalized intersection at College Avenue and the project's main driveway would create an additional delay of 10 to 18 seconds at the new traffic signal and would operate at an acceptable LOS B (refer to Table 22 in the LMA). Under Horizon Year conditions, the delay would increase to 12 and 19 seconds and the intersection would continue to operate at LOS B (refer to Table 29 in the LMA). The LMA addresses issues related to operations and safety for all transportation modes and demonstrates that the project's proposed improvements would support and promote active transportation and transit

modes in the project area. The LMA is not used to assess traffic impacts under CEQA, as described above in Master Response 5 on that issue.

Master Response 6: Non-CEQA Issues

The City received several comments raising issues that do not relate to potential environmental impacts or to the adequacy of the DEIR. Such comments, including general statements opposing the proposed project, questions about the need for the proposed project, and the extent of the project operations, are not within the purview of CEQA. This Master Response has been prepared to address those comments.

General Opposition

Several DEIR comments oppose the project for many reasons. All comments have been received and reviewed; however, opinions and expressions of opposition are unrelated to physical environmental impacts, do not pertain to whether impacts were appropriately analyzed in the DEIR, or do not address the adequacy of the environmental analysis contained in the DEIR. The purpose of an EIR is to present objective information on a project's environmental impacts. Public and agency comment allow any errors or omissions to be identified and corrected in the FEIR. Opinions concerning issues not within the purview of CEQA (such as socio-economic issues, services offered by the project, proximity to other religious uses, etc.), as well as expressions of opposition or support for a project, are made a part of the administrative record and forwarded to the decision-makers for their consideration in taking action on the proposed project, but they do not require further response in the CEQA document.

Need for Project

An EIR is not intended or required to provide justification or demonstrate the need for a particular project. In accordance with the requirements of CEQA, an EIR identifies project objectives and evaluates a proposed project's anticipated environmental impacts. Alternatives are compared to evaluate whether a less environmentally impactful proposal could achieve similar goals. Project objectives are meant to capture the high-level goals and purposes of a project without being so narrowly defined as to exclude meaningful analysis of alternatives.

The project objectives, as outlined in DEIR Chapter 3, are to:

1. Place the church/sanctuary in a central San Diego location that is both visible from and convenient to a regional freeway to facilitate church attendance.
2. Relocate to a church-owned property that has proximity to its existing congregation, including its members in City Heights, Mid-Cities, College Area, and Del Cerro.
3. Establish a place of worship that would accommodate the space needs of its staff and congregation.
4. Design the structures and site improvements to be sensitive to the existing topography and surrounding neighborhoods.

5. Address the parking needs on Sundays by constructing sufficient parking to accommodate the maximum projected parking demand.
6. Develop the church/sanctuary near where transit connections are readily available to its congregation.
7. Enhance the religious, spiritual, and community-building activities, including Sunday School and adult education, through the design and character of the indoor and outdoor spaces.
8. Fulfill the institution's religious mission to be a multi-ethnic, multigenerational local church with a global vision.

Comments received on the appropriateness of the objectives do not pertain to the physical environmental impacts of the project and, as such, they are not relevant to the adequacy of the DEIR and do not require further response in the CEQA document.

Project Operations

Comments speculate that the project operational details provided in the DEIR will change in when the church relocates to the project site and grows in the future. As discussed in DEIR Section 3.2, the project includes a 900-seat sanctuary with accessory uses (i.e., Sunday school classrooms, offices, and a multipurpose room/gym). Congregation gatherings would primarily occur on Sundays; small group activities may occur during the weekdays or on Saturdays. No primary educational school space is proposed as part of the project and the project's permit would be conditioned to prohibit the operation of a primary education school. Speculation on potential uses beyond what has been proposed by the applicant are hypothetical in nature and not reflective of the application, design and site plan submitted to the City and the project design analyzed in the DEIR. CEQA Guidelines Section 15145 prohibits speculation in an environmental analysis. The comments do not require further response in the CEQA document; however, they are included within the administrative record and will be forwarded to the decision-makers.

3. RESPONSE TO COMMENTS

Responses to specific comments in the letters received by the City during public review are provided in this section of the FEIR. The bracketed letters and corresponding responses are arranged in the order presented in Table RTC-1.

Opinions concerning issues not within the purview of CEQA, as well as expressions of opposition or support for a project, are made a part of the administrative record and forwarded to the decision-makers for their consideration but they do not require a response in a CEQA document. General opposition to the project expressed in the comments is addressed in Master Response 6.

Comments


Responses

3.1.1 Agency Letters


3.1.1.1 Letter A1: California Department of Fish and Wildlife (CDFW)

Letter A1

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3863 Ruffin Road
San Diego, CA 92123
www.wildlife.ca.gov



GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

October 14, 2022

Courtney Holowach
Associate Planner
City of San Diego
1222 1st Avenue
San Diego, CA, 92101
CHolowach@sandiego.gov

Subject: All Peoples Church (PROJECT) DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) SCH# 2021100394

Dear Ms. Holowach:

A1-1 The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a DEIR from the City of San Diego (City) for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹ CDFW previously submitted comments in response to the Notice of Preparation of the DEIR.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW may need to exercise regulatory authority as provided by the Fish and Game Code. CDFW also administers the Natural Community Conservation Planning (NCCP) program. The City of San Diego (City)

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

A1-1

CDFW's comments, role, and summary of the project objectives are acknowledged.

Comments

Responses

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Courtney Holowach, Planner
 City of San Diego
 October 14, 2022
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A1-1
 (cont.)

participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan. To the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) that is not a "covered species" in the City's MSCP, the project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

Proponent: City of San Diego (City)

Objective: The Project proposes the development of a 52,690 square-foot sanctuary/multipurpose building and a 71,000 square-foot two-level parking garage. The sanctuary/multi-purpose building would include a 900-seat church with accessory uses and surface parking next to the parking garage. Proposed Project activities include grading, excavation, backfill, and paving. It will also include off-site improvements to College Avenue and on-site construction of water quality basins to treat storm water runoff and a sewer/storm water connection to existing City facilities. The Project would require City approval of a Community Plan Amendment to modify the Navajo Community Plan, Planned Development Permit, Site Development Permit, and various easement vacations via the City's Process 5 procedure.

A1-2

Location: The 5.80-acre Project site is bounded by College Avenue on the west, the California Department of Transportation right-of-way including westbound Interstate 8 (I-8) off-ramp at College Avenue, and City Park and Recreation-owned dedicated parkland to the south, single-family homes along Marne Avenue and the western end of Glenmont Street to the east, and commercial properties to the north fronting Del Cerro Boulevard.

Biological Setting: The Project site contains 4.0 acres of sensitive biological resources, such as Diegan coastal sage scrub and non-native grassland, that are defined as Environmentally Sensitive Lands in San Diego Municipal Code Section 113.0103. The project site supports two sensitive vegetation communities: Diegan coastal sage scrub (including -disturbed; Tier II habitat under the MSCP) and non-native grassland (MSCP Tier IIIB habitat). The Project is bounded by mainly developed residential communities and I-8, with the exception of a 2-acre parkland immediately south. Three sensitive plant species are present on-site: graceful tarplant (*Holocarpha virgata* ssp. *elongata*; CNPS List 4.2), San Diego County sunflower (*Bahiopsis laciniata*; CNPS List 4.2), and ashy spike-moss (*Selaginella cinerascens*; CNPS List 4.1). One sensitive animal species, orange-throated whiptail (*Aspidoscelis hyperythra* *beldingi*; CDFW Watch List), is present on-site and is also an MSCP-Covered Species.

A1-2

CDFW's description of the project location, biological setting, and time frame as noted in DEIR Chapters 2 and 3 are acknowledged.

Comments

Responses

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A1-2 (cont.) ↑ **Timeframe:** Project will be constructed in a single phase, and construction is estimated to begin in late 2022 and be completed in early 2024.

A1-3 **COMMENTS AND RECOMMENDATIONS**
CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Based on the Project's avoidance of significant impacts on biological resources with implementation of mitigation measures, CDFW concludes that an Environmental Impact Report is appropriate for the Project.

A1-4 **COMMENT #1: Landscaping and Native Plants**
Biological Resources, Section 5.2.9
CDFW acknowledges that its prior request to include a discussion about the use of native plants is included in the DEIR. The DEIR states that landscaping will include "native/naturalized and/or drought-tolerant plant material." Again, CDFW advocates the use of native plant material during Project landscaping in order to minimize the spread of invasive plant species. Such landscaping also provides additional benefits such as the attraction of native pollinators and further reduced water consumption.

A1-5 ↓ **COMMENT #2: Pre-Construction Surveys and Monitoring**
Project Impacts and Proposed Mitigation under Biological Resources
Section I, subsection D and Section II, subsection A
Issue: Mitigation Measure BIO-1 (BIO-1) does not provide parameters regarding pre-construction surveys or monitoring during construction occurring during the avian nesting season.
Specific impact: Table ES-1 indicates pre-construction avian surveys and biological monitoring during project construction will occur. However, BIO-1 does not specify survey timing or buffer distances. A Project construction timeline is currently indicated to begin in late 2022 and continue until early 2024, in one single phase.
Why impact would occur: If avian surveys occur in the windows as they are currently defined, impacts to avian species may be significant. Construction is currently planned to occur during the entirety of 2023 and early 2024. This timeline overlaps with the avian nesting season.

A1-3

The CDFW's provided comments and recommendations, as well as its conclusion that an EIR is appropriate, are acknowledged.

A1-4

The DEIR has addressed this issue in Section 5.2, *Biological Resources*; therefore, no project revisions or mitigation is required.

A1-5

DEIR Section 5.2.3.2, page 5.2-21, states that, "Potential impacts to nesting birds could result if clearing of vegetation or construction occurs during the breeding season (February 1 to September 15). Clearing of vegetation or other construction activities could cause destruction or abandonment of active nests or mortality of adults, young, or eggs resulting in a potentially significant impact. This impact would be avoided through compliance with the MBTA and California Fish and Game Code as a condition of approval." Furthermore, per the approved biology report (Alden Environmental, August 2020, DEIR Appendix C) passerines, raptors, and any listed species do not occur on and have a low potential to occur on site. Specific mitigation for buffers is not required.

Compliance with these federal and State regulations is handled as a condition of project approval by the City. Therefore, the CDFW's recommended mitigation measures have not been incorporated in the FEIR.

Comments

Responses

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A1-5
(cont)

Evidence impact would be significant: Per California Fish and Game Code sections 3503, 3503.5, and 3513 the proposed Project is required to avoid the incidental loss of fertile eggs or nestings, or activities that lead to nest abandonment.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Project Description and Related Impact Shortcoming)

Mitigation Measure BIO-1: Biological Resource Protection During Construction

- **To reduce impacts to less than significant:** As per CDFW's NOP comment letter dated November 24, 2021, we recommend that avoidance buffers around active bird nests be specified in BIO-1, and generally recommend the following buffers from active nests: 100 feet for passerines, 300 feet for listed bird species, and 500 feet for raptors. Buffer distances may be reduced depending on site-specific circumstances such as screening vegetation, ambient levels of human activity, etc. as recommended by a project biologist and if approved by the City. In addition, for any species with specific buffer requirements identified in the MSCP (e.g., 300 feet from an active Cooper's Hawk nest), the MSCP directives should be followed.

Additionally, CDFW recommends the following be incorporated into mitigation regarding pre-construction surveys and monitoring in BIO-1:

A pre-construction nesting bird survey shall be conducted by a qualified avian biologist to ensure that active bird nests will not be disturbed or destroyed on the Project site, or adjacent sites. The survey shall be completed no more than three days prior to initial ground disturbance. If construction or related ground disturbance activities halt for a period of 7 or more days, a nesting bird survey shall be conducted within 3 days before construction resumes. The nesting bird survey shall include the Project site and adjacent areas where Project activities have the potential to affect active nests, either directly or indirectly due to construction activity or noise. A qualified biologist shall be present to monitor all ground disturbing and vegetation-clearing activities (including but not limited to trimming, mowing, grubbing) conducted for the Project. During each monitoring day, the biological monitor shall perform clearance survey "sweeps" at the start of each workday that vegetation clearing takes place to avoid impacts to sensitive biological resources.

If an active nest is identified during these surveys, appropriate avoidance buffers shall be established by a qualified biologist. Construction activities shall not occur within any disturbance limit buffer zones until the nest is deemed inactive by the qualified biologist.

Comments

Responses

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REFERENCES

- California Department of Fish and Wildlife. 2021. California Natural Diversity Database (CNDDDB). Available from: <https://wildlife.ca.gov/Data/CNDDDB>.
- California Department of Fish and Wildlife. 2021. CNDDDB Plants and Animals. Available from: <https://wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.
- California Department of Fish and Wildlife. 2021. Lake and Streambed Alteration Program. Available from: <https://wildlife.ca.gov/Conservation/LSA>.
- California Department of Fish and Wildlife. 2021. Submitting Data to the CNDDDB. Available from: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>.
- California Department of Fish and Wildlife. 2021. Survey and Monitoring Protocols and Guidelines. Available from: <https://wildlife.ca.gov/conservation/survey-protocols>.
- California Invasive Plant Council (Cal-IPC). 2021. Responsible Landscaping. Available from: <https://www.cal-ipc.org/plants/inventory/>
- California Native Plant Society (CNPS). 2021. CNPS Rare Plant Ranks. Available from: <https://www.cnps.org/rare-plants/cnps-rare-plant-ranks>.
- California Office of Planning and Research. 2009 or current version. CEQA: California Environmental Quality Act. Statutes and Guidelines, § 21081.6 and CEQA Guidelines, § 15097, § 15126.4(2).
- City of San Diego. 2022. Environmental Impact Report for All Peoples Church. Available from: https://files.ceganet.opr.ca.gov/273699-2/attachment/bgAR9yRcznkKlb_izZRwBJ4MGPCWjM4ny8D8a4dbMbdADN2M6KuzcqBDmc5P3B3XPuk4tCuRsOix6Sxk0
- City of San Diego. 2018. San Diego Municipal Code, Land Development Code, Biology Guidelines. Chapter 14: General Regulations.

Comments

Responses

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A1-6 | **ENVIRONMENTAL DATA**

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES

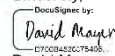
The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21069.)

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Alison Kalinowski, Environmental Scientist, at Alison.Kalinowski@wildlife.ca.gov or Alex Troeller, Environmental Scientist, at Alexandra.Troeller@wildlife.ca.gov.

Sincerely,

DocuSigned by:

0700042CC75406

David Mayer
Environmental Program Manager

ec:

State Clearinghouse, – State.Clearinghouse@opr.ca.gov
David Mayer, CDFW – David.Mayer@wildlife.ca.gov
Jennifer Turner, CDFW – Jennifer.Turner@wildlife.ca.gov
Jennifer Ludovissy, CDFW – Jennifer.Ludovissy@wildlife.ca.gov
CEQA Program Coordinator, Sacramento – CEQACommentLetters@wildlife.ca.gov
Jonathan Snyder, USFWS – Jonathan_d_Snyder@fws.gov

Attachments

Attachment A: Draft Mitigation Monitoring and Reporting Program and Draft Recommendations

A1-6


The request to submit data to the California Natural Diversity Database (CNDDDB); the notice that filing fees are necessary; and CDFW's conclusion to its comment letter are acknowledged.

Comments

Responses

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Attachment A
Draft Mitigation Monitoring and Reporting Program and Draft Recommendations

Draft Mitigation Monitoring and Reporting Program (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Biological Resources (BIO)		
Mitigation Measure (MM) Description	Implementation Schedule	Responsible Party
<p>BIO-1:</p> <p>A pre-construction nesting bird survey shall be conducted by a qualified avian biologist to ensure that active bird nests will not be disturbed or destroyed on the Project site, or adjacent sites. The survey shall be completed no more than three days prior to initial ground disturbance. If construction or related ground disturbance activities halt for a period of 7 or more days, a nesting bird survey shall be conducted within 3 days before construction resumes. The nesting bird survey shall include the Project site and adjacent areas where Project activities have the potential to affect active nests, either directly or indirectly due to construction activity or noise. A qualified biologist shall be present to monitor all ground disturbing and vegetation-clearing activities (including but not limited to trimming, mowing, grubbing) conducted for the Project. During each monitoring day, the biological monitor shall perform clearance survey "sweeps" at the start of each workday that vegetation clearing takes place to avoid impacts to sensitive biological resources.</p>	<p>Prior to construction activities and throughout Project construction</p>	<p>City of San Diego</p>

A1-7

↓

A1-7

As explained in Response to Comment A1-4, DEIR Section 5.2 has adequately addressed the nesting bird issue and the City will enforce the requirements through a condition of approval; therefore, no mitigation is required, and the recommended language in this comment for mitigation measure REC-1 has not been incorporated into the FEIR.

Comments

Responses

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A1-7
 (cont.)

<p>If an active nest is identified during these surveys, appropriate avoidance buffers shall be established by a qualified biologist. CDFW generally recommends a buffer of 100 feet for passerines, 300 feet for listed bird species, and 500 feet for raptors. Buffer distances may be reduced depending on site-specific circumstances such as screening vegetation, ambient levels of human activity, etc. as recommended by the project biologist and if approved by the City. In addition, for any species with specific buffer requirements identified in the MSCP (e.g., 300 feet from an active Cooper's Hawk nest), the MSCP directives should be followed. Construction activities shall not occur within any disturbance limit buffer zones until the nest is deemed inactive by the qualified biologist.</p>		
<p>Recommendations</p>	<p>Implementation Schedule</p>	<p>Responsible Party</p>
<p>REC-1 CDFW advocates the use of native plant material during Project landscaping in order to minimize the spread of invasive plant species. Such landscaping also provides additional benefits such as the attraction of native pollinators and further reduced water consumption</p>	<p>During Construction and Post- Construction</p>	<p>City of San Diego</p>

Comments



Responses

3.1.1.2 Letter A2: California Department of Transportation (Caltrans)

Letter A2
CALIFORNIA STATE TRANSPORTATION AGENCY
GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
(619) 709-5152 | FAX (619) 688-4299 TTY 711
www.dot.ca.gov



October 14, 2022

11-SD-8
PM 8.20
All Peoples Church
DEIR/SCH#2021100394

Ms. Courtney Holowach, Associate Planner
City of San Diego
Development Services Department
1222 1st Avenue
San Diego, CA 92101

Dear Ms. Holowach:

A2-1 Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for the All Peoples Church project located on College Avenue near Interstate 8 (I-8). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users.

Caltrans has the following comments:

The All People's Church/developer has acknowledged the following:

1. No access to the project site through Caltrans Right of Way (R/W) will be allowed.
2. The Caltrans R/W fence and footing is to be protected in place as all grading (both temporary and permanent) will be on the project site.
3. The developer plans to protect all Caltrans' fencing in-place at the project boundary.

"Provide a safe and reliable transportation network that serves all people and respects the environment"

A2-1

Comments are noted. An encroachment permit is not expected to be required to implement the project improvements, all of which would occur outside the state right-of-way (ROW).

Comments

Responses

Ms. Courtney Holowach, Associate Planner
October 14, 2022
Page 2

A2-1 (cont.) ↑
4. No fencing is intended to be replaced and/or removed. Therefore, no encroachment permit will be necessary for the work within Caltrans R/W.

A2-2 **Traffic Control Plan**

A Traffic Control Plan is to be submitted to Caltrans District 11, including the interchanges at I-8/College Avenue, at least 30 days prior to the start of any construction. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during closures, including routes and signage.

Potential impacts to the highway facilities (I-8) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

Caltrans appreciates the opportunity to have reviewed the above referenced environmental document for the proposed project.

Additional information regarding encroachment permits for Traffic Control may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or emailing DL1.Permits@dot.ca.gov or by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions or concerns, please contact Mark McCumsey, LDR Coordinator, at (619) 985-4957 or by e-mail sent to Mark.McCumsey@dot.ca.gov.

Sincerely,

Maurice A. Eaton

MAURICE EATON
Branch Chief
Local Development Review

"Provide a safe and reliable transportation network that serves all people and respects the environment"

A2-2

A Traffic Control Plan will be prepared, as required by San Diego Municipal Code Section 129.0702, and the approved plan will be submitted to Caltrans District 11 prior to the commencement of construction.

Comments

Responses





3.1.2 Organizations Letters

3.1.2.1 Letter O1: Campo Band of Mission Indians

Letter O1

...

[EXTERNAL] Project Name: All Peoples Church PN.636444




[Daniel Tsosie <dtsosie@campo-nsn.gov>](mailto:dtsosie@campo-nsn.gov)     ...

To: DSD CAS Wed 9/1/2022 4:47 PM
Cc: Marcus Cuero <marcuscuero@campo-nsn.gov>

O1-1 | To whom it may concern: We the Campo Band of Mission Indians have received your letter regarding "Project Name: All Peoples Church PN.636444". And we are interested due to construction ground disturbance and cultural resources that may be on the project. Thank you for reaching out.

Best Regards,

Daniel Tsosie
Campo Band of Mission Indians
Cultural Resource Manager
Cell: 619-632-8812
Office: 619-478-9046 ext.278

 Reply  Reply all  Forward

about:blank 1/1

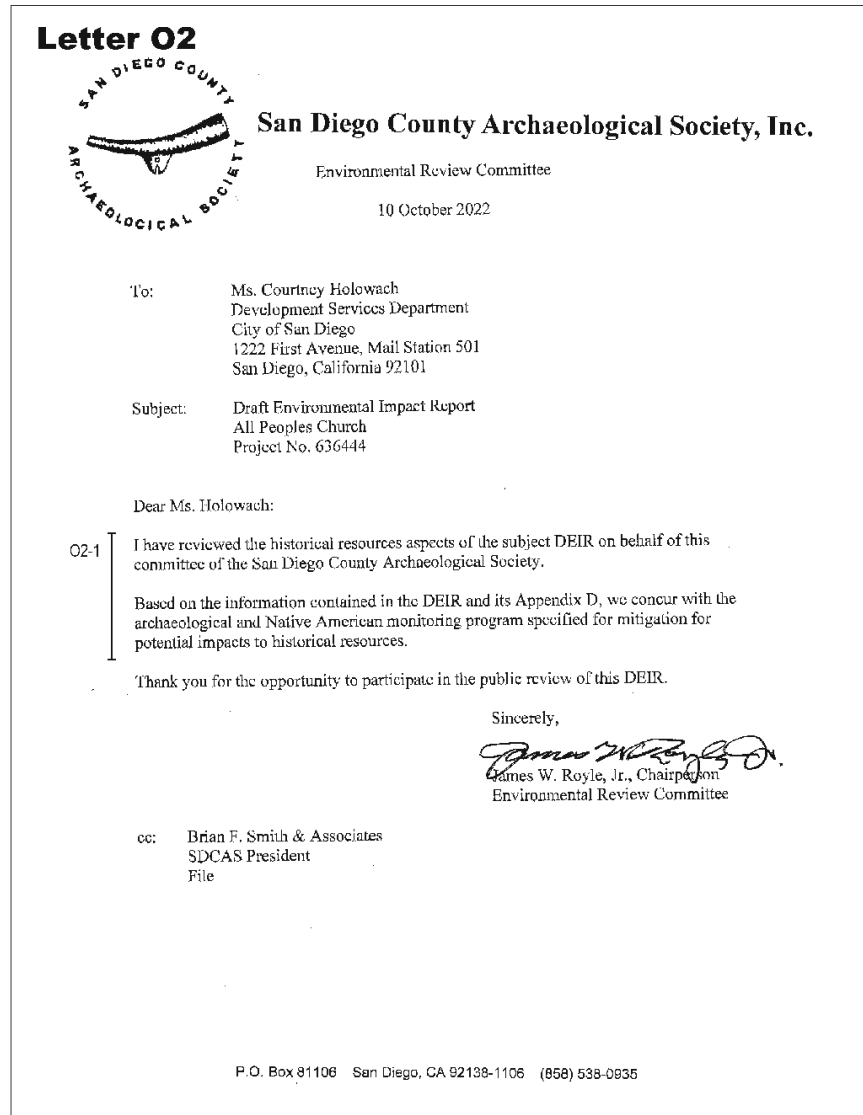
O1-1

Section 5.3 DEIR Mitigation Measure HR-1 requires cultural resource (archaeological resource) protection during project construction, including the use of a Native American consultant/monitor during soil disturbing and grading/excavation/trenching activities within native soils. If Native American resources or remains are discovered during construction, the mitigation measure further outlines specific protocols for involving tribal entities in the evaluation and disposition process. The City will keep the Campo Band of Mission Indians notified throughout the construction phase of the project, as it relates to Native American resources and/or remains, pursuant to DEIR Mitigation Measure HR-1.

Comments

Responses

3.1.2.2 Letter O2: San Diego County Archaeological Society



O2-1

Comment noted; refer to Response to Comment O1-1 from the Campo Band of Mission Indians.

Comments

Responses

3.1.2.3 Letter O3: Navajo Community Planners

Letter O3



October 12th, 2022

City of San Diego Development Services Center
ATTN: Courtney Holowach
1222 First Avenue
MS 501
San Diego, CA 92101

RE: Comments on Draft Environmental Impact Report
Project Name: All Peoples Church
Project No.: 636444

To whom it may concern,

- 03-1 The Navajo Community Planners Inc. ("NCP"), hereby submits the following comments in response to the City of San Diego's ("City") Draft Environmental Impact Report ("Draft EIR") dated August 31, 2022, for the "All Peoples Church" project ("Project") (Project Number 636444).

Overall, NCP feels the Draft EIR report for project 636444 is inadequate with respect to several issues as it relies upon conflicting information and incomplete data. These deficiencies have caused the City to underestimate the significance of the Project's environmental impact on the community.
- 03-2 As detailed below, the supporting documentation relied upon by the City in preparing the Draft EIR is inadequate and does not support the conclusions that the project would not have a significant impact on: Air Quality (Section 7.1.2); Energy Usage (Section 7.1.3); Public Services and Facilities (Section 7.1.11); and Transportation (Section 7.1.12). In addition, the Draft EIR relies upon outdated, incomplete, and inadequate information to underestimate potential significant impacts the Project will have on the community with regard to: Land Use (Section 5.1), Noise (Section 5.4), and Visual Effects and Neighborhood Character (Section 5.5). In doing so, the Draft EIR also incorrectly concludes that the Project's impacts are not cumulatively considerable.

At a minimum, the reports upon which the Draft EIR is based demonstrate a need for further analysis to ensure reliable data is used for the City to make an informed analysis regarding the

03-1

No specific DEIR inadequacies or deficiencies are noted in this comment. Responses are provided below to the other comments contained in this letter (refer to Responses to Comments O3-2 through O3-14).

03-2

This comment references various sections of the DEIR; however, without any specificity with regard to the inadequacy of the supporting documentation, a specific response cannot be provided to this comment. The supporting documentation in the City files does not recommend further direct or cumulative analysis beyond that which is contained in the DEIR. See Master Response 2 regarding the methodology for establishing the project's cumulative baseline conditions and assessing cumulative impacts. Refer to Responses to Comments O3-3 through O3-14 for additional responses.

Comments

Responses

03-2 (cont.)	<p>potential environmental impact of the Project. Repeated concerns expressed by the community regarding the Project's major potential impacts appear to be glossed-over based on incomplete and flawed data. The Draft EIR fails to adequately address the true cumulative and Project-level impacts on the community.</p> <p>Specifically, the City should collect additional information regarding the potential impacts associated with implementation of the Project before finalizing the environmental impact report for consideration by decision-making authorities:</p>
03-3	<p>Section 3 – Project Description</p> <ul style="list-style-type: none"> • 3.4.1 – Community Plan Amendment and Table 3-1
03-4	<p>Section 5 – Environmental Analysis</p> <ul style="list-style-type: none"> • 5.1 – Land Use <ul style="list-style-type: none"> ○ The Draft EIR approaches the subject from the pretense that simply adding a cross to the map eliminates a multitude of issues/impacts to the surrounding community. [P. 5.1-10] ○ Table 5.1-2 on page 5.1-38 the response in the consistency evaluation section is inaccurate. The principal objective notes “encourage the development of a variety of new housing types with dwelling unit densities primarily in the low to medium density range as shown.” The response states – yes. This is counterintuitive, once the church is built no housing will be built onsite or in the area because of the church – the answer here should be no. ○ The Draft EIR fails to provide support for its conclusion that although the Project “would substantially alter the existing and planned residential character of the area, the project’s height, bulk, signage, or architectural projections would not result in a negative visual appearance due to its topographically-sensitive site layout, cohesive architectural styling, and below grade placement of retaining walls combined with the heavy use of screening vegetation and landscape treatments to soften its appearance from nearby public and private viewing areas.” (Section 5.5.4.2) <ul style="list-style-type: none"> • In particular, the report does not include any detailed information showing the landscaping plan or • Nothing to illustrate “the heavy use of screening vegetation and landscape treatments to soften its appearance from nearby public and private viewing areas.”
03-5	
03-6	<ul style="list-style-type: none"> • 5.4 – Noise <ul style="list-style-type: none"> ○ 5.4.3.3 – The EIR addresses construction noise and makes reference to some parking noise but makes no mention of noise created by services, special events such as outdoor gatherings, or potential for use of lot for SDSU events.

03-3

The comment references the Community Plan Amendment description and a table listing the proposed development deviations permitted under a Planned Development Permit, as noted in DEIR Chapter 3 The information presented in DEIR Chapter 3 reflects the application and site plan, architecture and landscape submittals on file at the City. No deficiencies exist to provide an informed and meaningful analysis of the project, as required by CEQA.

03-4

Refer to Master Response 3 on the project’s consistency with the applicable land use policies from the General Plan, Community Plan, and zoning regulations, which addresses the specific policy concerns expressed in this comment. DEIR Section 5.1 states that a non-residential use would be constructed on site instead of housing; however, the analysis demonstrates that the church would comply with the applicable Residential Element policies in the Navajo Community Plan related to design. Therefore, less-than-significant land use policy impacts are identified in the DEIR.

03-5

With regard to the Visual Effects and Neighborhood Character impacts of the project outlined in DEIR Section 5.5, refer to Master Response 4 on neighborhood character. The DEIR discussion in Section 5.5.4 makes multiple references to the landscaping proposed to buffer, screen and soften the appearance of the project features when viewed from both public and private vantage points. DEIR Figure 3-6 contains an exhibit of the proposed landscape plan. DEIR Figures 3-3 and 3-5 contain illustrations of example landscaping along the project’s west and southwest elevations, including an example of screening vegetation on the proposed parking garage. Additionally, project simulations contained in DEIR Section 5.5 include illustrations of the proposed structures, with landscaping. Thus, detailed information is presented in the DEIR regarding landscaping.

03-6

The DEIR Section 5.4 does not address the additional noise sources mentioned in this comment because they are not proposed by the applicant. The comment contains speculative conjecture on what activities may occur that are not based

Comments	Responses
	<p>on information presented by the applicant. CEQA Guidelines Section 15145 prohibits speculation in an environmental analysis. No response required.</p> <p>Noise Monitoring Location #2 was selected to characterize the ambient noise experienced within and immediately adjacent to the project site. As stated in DEIR Appendix E, the noise source most commonly affecting ambient conditions on the project site and vicinity is automotive vehicles operating on local roads, mainly those on I-8 and College Avenue (e.g., cars, trucks, buses, motorcycles). Locations closer to the site would be on private properties, which are not accessible, are more directly exposed to noise from I-8 and College Avenue, and likely experience higher noise levels than measured at location #2. The measurement data were taken using noise monitoring equipment and is accurate.</p>

Comments

Responses

O3-6 (cont.)	<ul style="list-style-type: none"> ○ 5.4.3.4 – Noise monitoring station #2 was not placed at the closest residence point to the property. This data point is not going to be as accurate as it should be.
O3-7	<ul style="list-style-type: none"> ● 5.5 – Visual Effects and Neighborhood Character <ul style="list-style-type: none"> ○ 5.5.4 – lists 3 issues/questions. Issue 2 seems subjective to personal taste but issues 3 and 4 are in conflict with the findings in 5.5.4.3 ○ 5.5.4.3 –notes a less than significant neighborhood character impact. The document makes multiple references to matching designs from SDSU and other buildings along the 8 that are not part of the local community and do not share similar architectural features. The Navajo Community Plan, Section: Community Environment (page 150) was not cited apart of this EIR and the proposed projects visual effects on neighborhood character. Also, the addition of a large religious symbol at the entrance to the community would be a drastic divergence from the current community character in that area. The less than significant character impact declaration is not accurate.
O3-8	<p>Section 6 – Cumulative Impacts</p> <ul style="list-style-type: none"> ● Mentions CEQA Guidelines Section 15130 – (A) a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency. <ul style="list-style-type: none"> ○ The report makes note of SDSU’s master plan that proposes faculty/staff housing in Adobe Falls portion of Navajo and says it’s factored in even though the timing and details are unknown. ○ The study does not include city project number PRJ-1061051. This project is currently under review with DSD and was submitted 5/20/2022. The data in the study does not include potential impacts from this project which is an estimated - 1316 trips including 97 (33 in : 64 out) during the AM peak hour and 121 trips including 78 in: 43 out) during the PM peak hour.
O3-9	<p>Section 7 – Other CEQA Sections [No Potential Significant Impacts Found]</p> <ul style="list-style-type: none"> ● 7.1.2 - Air Quality <ul style="list-style-type: none"> ○ The Draft EIR bases its conclusion that “the health risk impacts from construction DPM would not exceed the SDAPCD CEQA significance thresholds adopted by the City” on the Bluescape Environmental report in Appendix G. ○ This report calculated the cancer risk and non-cancer chronic and acute risk impacts at the Maximally Exposed Individual (MEI) for residents and for the nearest school in the vicinity of the Project site to be 9.70 in one million, which is just below the significance threshold of 10 in one million. (See Section 7.1.2.3 Table 7-6.) However, this calculation is inadequate as it is relies on meteorological data from 2014-2016 despite the fact that the San Diego County Air Pollution Control District has published data as recently as 2021. (See

O3-7

As stated in Master Response 4 on neighborhood character, the DEIR Section 5.5 analysis applies the City’s adopted Significance Determination Thresholds for Visual Effects and Neighborhood Character. Based on the thorough analysis contained in DEIR Section 5.5, the project would result in less-than-significant impacts and does not rely on the precedence set by the SDSU architecture, but rather evaluates the project’s impacts within the entire visual setting surrounding the project site. Contrary to the commentor’s claim, the project is evaluated for its consistency with the Community Environment policies from the Navajo Community Plan in revised DEIR Table 5.1-2 (pages 5.1-42 and 5.1-43). As stated in the table the project would create a quality design using materials, color and texture that give it identity and focus within the urban landscape, consistent with the overarching goal of the policies. The presence of a cross atop one of the three tower elements on the church/sanctuary, which would be eight feet in height, would not be a drastic divergence from the local character of the community, as shown in DEIR Figure 5.5-4a. For the reasons outlined in DEIR Section 5.5, project impacts associated with neighborhood character would be less than significant.

O3-8

The City requested that the SDSU proposal in Adobe Falls be identified as a cumulative project in the area since it is a reasonably foreseeable probable future project, as stated in CEQA Guidelines Section 15333. As noted in Master Response 2 on cumulative impacts, the ministerial project mentioned in this comment was filed seven months after the NOP was filed for the project’s DEIR, which is the timeframe for establishing the cumulative baseline conditions for a DEIR. As described in the referenced Master Response 5, the VMT analysis conducted to assess project impacts under CEQA addresses both project and cumulative impacts. Thus, the transportation analysis in DEIR Section 7.1.12 is a project as well as cumulative assessment. The nearby ministerial project is being processed under the Complete Communities Program.

O3-9

The air quality and screening health risk assessment relies on 2014–2016 meteorological data embedded in the CalEEMod version 2020.4.0 computer model, which was the most current data available at the time the analysis was

Comments

Responses

conducted in 2021. The link provided in the comment is to ambient air pollution monitoring data, not meteorological data. The comment confuses the background data, not used in CalEEMod, just reported, with the health risk modeling conducted on the construction activities. The document linked to this comment lists the current monitoring network in the San Diego Air Basin (SDAB) for criteria pollutants that are used to describe the baseline pollution levels in the region. Those data are not relevant to screening health risk assessment which uses meteorological data. No recalculation of health risk assessment impacts is required.

Comments

Responses

O3-9 (cont.)	<p>https://www.sdapcd.org/content/dam/sdapcd/documents/monitoring/2021-Network-Report.pdf) (See Appendix G, pp. 13 and 98.)</p> <ul style="list-style-type: none"> o The potential risk for nearby residents and schools should be recalculated using the most up-to-date data available.
O3-10	<ul style="list-style-type: none"> • 7.1.3 - Energy Usage <ul style="list-style-type: none"> o Has a subsection titled Operations (7.1.3.1) – in this section they note 280 daily trips during weekday – which is just shy of the “SIGNIFICANTLY IMPACTFUL” 300 DAILY TRIPS. Appendix J breaks down how this number was calculated but based on the below items the entire traffic study needs to be revised and would show a significant impact if done using accurate data points. <ul style="list-style-type: none"> • Item 8.4.1 in appendix J notes that the gym usage was calculated at 0-10 users per day, but the attached document sent to the mayor on 12-21-20 by the Atlantis Group notes the gym will be used for youth/community sports. The usage of the gym alone will push the weekday usage far beyond the 280 trips per day. • Item 8.4.2 in appendix J discusses Sunday trip generation and appears to use the data from Appendix K page 6 which is showing data points from 2018 and 2019. The church has already outgrown the growth projections used to calculate the number of trips that will be generated. • [Also see Transportation section below.]
O3-11	<ul style="list-style-type: none"> • 7.1.11 - Public Services and Facilities <ul style="list-style-type: none"> o Potential impact on Fire-Rescue and Police Services underestimated. o The document references SDFD Engine 31 and SDPD and states that the project itself would be built in a manner that would allow for acceptable access and response times to the site. <ul style="list-style-type: none"> • The traffic study fails to consider the impact to response times for the surrounding community by either SDPD or SDFD. Engine 31 is not the only one that services the community. • The study must consider impacts to all engines which service the surrounding area. Also, study needs to address impact to emergency services response times to community, especially on Sundays or during events where all 300 parking spots would be in use for in and out use within a window of several hours.
O3-12	<ul style="list-style-type: none"> • 7.1.12 - Transportation <ul style="list-style-type: none"> o Project improperly designated as a “small project” because the calculation is based on unreliable data provided by the project applicant. (See p. 7-28.) <ul style="list-style-type: none"> • “The higher weekday project traffic volume was based on the applicant forecasted uses and was calculated at 280 ADT with 31 AM peak hour trips (31 inbound and 0 outbound) and 107 PM peak hour trips (76 inbound and 31 outbound) as shown in Table 1.4; Appendix K, p. 4

O3-10

The Energy analysis in the DEIR addresses whether the project’s energy usage would be wasteful, inefficient or unnecessary, in accordance with the City’s significance determination thresholds. Under the operational petroleum usage paragraph on DEIR page 7-10, the energy discussion takes into account the range of vehicle trips anticipated for the project, including both the 280 weekday trips and the 1,976 Sunday trips. Within this context, the DEIR concludes that the project’s petroleum use would diminish over time as vehicle fuel efficiency improves (based on mandated fuel efficiency standards) and the project’s availability to alternative transportation modes. Therefore, the project’s petroleum usage would not be wasteful, inefficient or unnecessary and less-than-significant impacts are identified. The volume of weekday trips referenced in this comment is valid, as described in Master Response 5 on trip generation rates.

O3-11

The project site plan has been reviewed and approved by City Fire and Rescue Department staff and would be built consistent with City fire regulations. Although response times goals are contained in Public Facilities, Services, and Safety Element of the City’s General Plan, the City’s CEQA significance determination thresholds do not consider response times an environmental impact unless they trigger the need for new facilities and the construction of those facilities would result in physical impacts on the environment. The project would not result in the need for new emergency response facilities; therefore, the DEIR Section 7.1.11 appropriately concludes that impacts to public services would be less than significant. The project would be required to pay development impact fees prior to issuance of building permits, a portion of which could support maintenance of fire protection and emergency response services provided by the City.

O3-12

Refer to Master Response 5 regarding trip generation rate which explains the methods used for developing the project’s trip generation volume and details why it is appropriate and valid. To clarify the methodology, it is standard industry practice to use “average” daily trips when estimating a project’s traffic volumes. Averaging a project’s weekday trips accounts for minor fluctuations in

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	<p>the amount of vehicles travelling to and from a site over the period of a week. On average, 280 daily trips are expected to be produced by the project on an average weekday, taking into account all of the services and programs to be offered on site, including the gymnasium. The project meets the definition of Small Project identified in the VMT screening criteria of the City's Transportation Study Manual (TSM), which is defined as a project generating less than 300 daily unadjusted driveway trips using the City of San Diego trip generation rates/procedures.</p> <p>With regard to staffing, the church currently has a staff of 8 to 25 persons and would increase to 25 to 30 persons in the future. Traffic from staffing is accounted for in the project's weekday and Sunday trip forecasts contained in DEIR Appendices J and K.</p> <p>The City's Transportation Study Manual requires projects to provide a systematic safety review as part of the Local Mobility Analysis.</p>

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O3-12 (cont.)	<ul style="list-style-type: none"> • For example, the applicant estimated that use of the gymnasium (which takes up a considerable space) would be used by only 0-10 people on weekdays. This grossly underestimates the number of people that would appear for even a youth basketball game for instance. • This estimate is also directly contradicted by the applicant's own admission that the gym will be used for youth/community sports (See Atlantis Group letter to Mayor dated 12-21-20.) • Figures for anticipated gatherings were also estimated by the applicant without any substantiation. These figures do not correspond to the size and scope of the building and its facilities. • The Project cannot qualify as a "small project" based on the obviously flawed data based entirely upon the "applicant's forecasted uses". • If the applicant currently has a staff of 25-30 persons, it is unreasonable to estimate that they will not have additional staff when this massive facility is built. • Please clarify the findings regarding how the proposed traffic signal and the existing traffic signal at College/Del Cerro Blvd will be synchronized to maximum the best possible traffic circulation for the community. • Please clarify if a sidewalk safety analysis was performed apart of this EIR and to what affects the proposed project will have on sidewalk safety.
O3-13	<p>Section 8 – Project Alternatives</p> <ul style="list-style-type: none"> • 8.3.3 No Project/Existing Community Plan <ul style="list-style-type: none"> ○ This section makes note of a fictional maximum use project that would make use of the land and create more traffic/impact than project #636444. The design they discuss doesn't appear to be physically feasible in the space given the land formation. The choice to use a made-up project is in conflict with Project # 699527 that has had an EOT filed for it and was previously approved by city council. This project is for 24 homes and would generate few enough trips to count as small project by the City.
O3-14	<ul style="list-style-type: none"> • Section 8.4.3.1 <ul style="list-style-type: none"> ○ The extent to which the Project's impacts can be mitigated by the removal of 37 parking spaces according to the Reduced Project Alternative should be explored further in the report to enable decision-makers to adequately consider the alternative recommendation. For example, removal of the 37 parking spaces from the northeast corner adjacent to the residences which are closer to the Project grade would likely result in significantly more mitigation of impact on the neighboring residences than if they were removed from elsewhere. The Reduced Alternative only considers the potential reduction in grading footprint. Instead, the Draft EIR should specify that the removal of these parking spaces from the

O3-13

Under the existing Community Plan and zoning, the 5.99-acre parcel could be developed with up to 52 single-family homes (assuming 5,000-square-foot lots). The Land Development Code Section 141.0302 also allows for accessory dwelling units on each of the residential lots. Therefore, the No Project/Existing Community Plan Alternative could allow for up to 104 homes. Such an alternative would be feasible with the use of retaining walls and fill to produce buildable area. The Reduced Residential Alternative (analyzed in DEIR Section 8.4.2) reflects the 24-unit residential subdivision previously approved on the project site. In both cases, residential development of the site would not achieve any of the project objectives outlined in DEIR Chapter 3 and Section 8.2.1.

O3-14

To reduce the project's impacts to biological and historical resources, the grading would have to be reduced in areas where such resources occur. The northeast area referenced in this comment contains disturbed habitat which lacks the necessary natural resources to accomplish the objective of reducing the project's significant impacts to sensitive biological resources, as defined by the Reduced Project Alternative. Given that the parking structure would be recessed into the terrain in the northern portion of the site and no significant impacts are identified in the DEIR related to building height, no significant impacts would be avoided by reducing grading in the northeastern portion of the site. Construction noise impacts may be lessened by the Reduced Project Alternative, but not below significant levels, as stated in DEIR Section 8.4.3.1.

Comments

Responses

O3-14
(cont.)



northeast area (adjacent to Lots 1-6) would provide a significant mitigation of issues caused by the Project by retaining any currently existing height differences and preventing additional noise. (See Site Plan p. 3-2.)

Respectfully,

David S. Smith
Chair
Navajo Community Planners, Inc.

DRAFT

Comments

Responses

3.1.3 Individuals Letters

3.1.3.1 Letter I1: Summer Adleberg

Letter I1

From: summer adleberg <summer.adleberg@gmail.com>
Sent: Sunday, October 16, 2022 3:05 PM
To: DSD EASNoticing <DSEASNoticing@sanidiego.gov>; DSD EAS <DSEAS@sanidiego.gov>
Cc: CouncilMember Raul Campillo <RaulCampillo@sanidiego.gov>
Subject: [EXTERNAL] Project Name: All Peoples Church Project No. 636444 SCH No. 2021100394

Project Name: All Peoples Church
 Project No. 636444
 SCH No. 2021100394
 Community Plan Area: Navajo
 Council District: 7

- I1-1 I am writing in opposition of the proposed project to convert a designated residential property to allow for non-residential land-use. The site is currently designated for residential use and zoned RS-1-7, which could yield a maximum of 52 dwelling units. The property is entitled and has been approved for 24 single-family dwelling units.
- I1-2 The housing shortage and crisis in San Diego has become one of the City's biggest hurdles to overcome and has only been exacerbated by the recent pandemic. The City has failed to build and encourage smart development of available properties to accommodate the rate of economic and population growth. The City's latest inventory report indicates San Diego is falling short of its 10-year housing goal of the planned approximately 88,000 new units only 37,000 were constructed. While some City initiatives indicate the goal for increased housing focuses on infill development, the City's housing inventory map indicates there is capacity to build on thousands of possible sites including the property proposed for the All Peoples Church. In order to meet the City's 2021-2029 goal of building 108,000 units it will need every parcel and unit including the 24 single-dwelling units already approved for this property.
- I1-3 I disagree with the project proponent's conclusion that the proposed project is consistent with the General and Navajo Community Plan and that all Land Use impacts would be less than significant requiring no mitigation. The conclusion provides no analysis of the General Plan Housing Element, all other aspects if the General Plan have been analyzed. The proposed project parcel is identified in the General Plan Housing Element as a part of the Adequate Site Inventory with a maximum potential of 49 - 52 units. In order to adequately consider and disclose any potential impacts on Land Use, pursuant to CEQA guidelines, the City must analyze the impact of the land use designation change that would result in, at a minimum, the loss of 49 - 52 single-dwelling units.
- I1-4 The EIR concludes that the proposed project is consistent with the principal objective of the Community Plan to maintain, enhance and encourage residential housing, the project would maintain the existing residential land use designation and zoning on the site. A project objective is to provide a church-owned property for an existing congregation and would involve the construction of a non-residential, religious assembly use rather than housing. The 2015 Navajo Community Plan clearly outlines the principal objectives for this community including: 1. Promote a healthy environment by careful planning and

I1-1

Comment noted; refer to Master Response 6 regarding the non-CEQA topic of general opposition to the project, as well as Master Response 1 regarding alternative location or use of the project site.

I1-2

Comment noted; refer to Master Response 3 that addresses residential housing policy consistency, which is not a CEQA topic.

I1-3

Refer to Master Response 3 addressing the project's consistency with City land use policies. The project does not propose changes to the General Plan or Community Plan residential land use designation of the site.

I1-4

The project is consistent with the Community Plan policies as provided in DEIR Section 5.1, and as outlined in Master Response 3 addressing land use policy consistency. The church would serve the local community and, as disclosed in DEIR Section 7.1.12, *Transportation*, and Section 5.4, *Noise*, its operational effects on traffic and noise impacts would be less than significant.

Comments

Responses

- I1-4 (cont.) sensitive development of well defined, balanced and distinct communities which encompass a variety of residential density patterns and housing types, and 2. Encourage the design of residential areas so as to prevent the encroachment of incompatible uses and minimize conflict (e.g., traffic noise) with more intensive non-residential uses. The All Peoples Church will not promote a healthy environment through balanced residential development and will result in increased traffic and noise from more intensive non-residential development.
- I1-5 The current CEQA guidelines require all CEQA lead agencies to analyze a project's transportation impacts using vehicle miles traveled (VMT). VMT measures the per capita number of car trips generated by a project and distances cars will travel to and from a project, rather than congestion levels at intersections (level of service or "LOS," graded on a scale of A – F). The City of San Diego has not yet adopted VMT standards, nor have they abandoned LOS, the City of San Diego's published Traffic Impact Analysis guidelines still require LOS analysis — not for CEQA purposes. The City has an established method for evaluating traffic impacts on the community and the environment, the project proponent should be required to conduct and publish both VMT and LOS analysis to allow better public input on the proposed project per the City of San Diego's published Traffic Impact Analysis guidelines.

I1-5

Refer to the transportation Master Response 5 regarding Vehicle Miles Traveled (VMT) Assessment and Local Mobility Analysis (LMA).

Comments

Responses

3.1.3.2 Letter I2: Stephanie Ballinger

Letter I2

From: Stephanie Ballinger <rmisskimmel@aol.com>
Sent: Monday, October 17, 2022 4:33 PM
To: DSD EAS <DSD EAS@sandiego.gov>
Cc: DSD EAS <DSD EAS@sandiego.gov>
Subject: [EXTERNAL] All Peoples Church No.636444- Attn: Courtney Holowach

To Whom It May Concern:

I2-1 As a proud homeowner in the Del Cerro community, we are shocked, angered, and disappointed to hear about All Peoples Church trying to move into our neighborhood. That specific area is NOT zoned for that, so it should not even be considered...it is a clear violation! The people who bought houses near there would be very negatively impacted as when they bought their homes the area they want to build on specifically states it was not zoned for that. We do not need more churches in this already saturated area, we have them all over the place. That intersection is already riddled with traffic as it is...and a mega church will wreak havoc on the traffic and the 4 way lights there. Its already a dangerous and busy intersection for families trying to cross to Hearst. May I suggest the church look into the large abandoned Fry's off the 15, it has lots of parking and is huge in size and right off the freeway and away from neighborhoods in an already industrial area.

I2-2 Furthermore, we cannot stand for hate in this community. My best friend since kindergarten was also trying to move closer to Hearst school and reconsidered when she heard about this mega church and their 'gay conversion therapy.' We have no place for that in Del Cerro and as a friend of many in the LGBTQ community I cannot stand by and watch them do this right in my backyard. Right when people exit the freeway to enter our community, all they would see would be this mega church, the traffic they cause, and their 'conversion therapy' signage. Please do what's right for the community! We don't want or need a mega church here! It's not zoned for it and it's not wanted! Thank you for your time.

I2-3 Important points to consider:

OUR THREE MAIN CONCERNS:

1. We have all acknowledged that San Diego is in a severe housing crisis. There is already an approved 24 unit housing project e titled to the land. By approving the mega project, council members are essentially voting NO on housing.

I2-4 2. San Diego Municipal Code, Table 131-04B, Use Regulations Table for Residential Zones, specifically disallows Religious Assembly in RS 1-7 Zoning. Without a general plan amendment This project would be a violation of San Diego's Municipal Code. Additionally, the Navajo Community Plan does not adequately incorporate or consider appropriate siting of religious institutions and would also need to be revised.

I2-5 3. Environmental Concerns/VMT (Vehicle Miles Traveled): The project applicant has admitted they expect 95% of the people attending their site to come from out of the area, and then leave the area, in essence doubling the greenhouse gas emissions as they cater to an audience from out of the area. This runs counter to the City's Climate Action Plan of reducing greenhouse gas emissions.

Respectfully,

Stephanie B

I2-1

The comment does not address the adequacy of the DEIR; refer to Master Responses 1, 5, and 6 regarding general opposition to the project, alternative location or use of the site, transportation and need for the project.

I2-2

The comment does not address the adequacy of the DEIR.

I2-3

The comment does not address the adequacy of the DEIR; refer to Master Responses 1, 3, and 6 regarding general opposition to the project, alternative location or use of the site, need for the project and regional housing policy. Building housing is not one of the project objectives outlined in DEIR Chapter 3. The 24-unit residential subdivision that was previously approved on site is described in the Reduced Residential Alternative and it would have similar significant impacts as the church/sanctuary project as discussed in DEIR Chapter 8.

I2-4

As stated in DEIR Section 3.4, approval of the Community Plan Amendment allows a religious assembly use on the project site. Pursuant to San Diego Municipal Code Section 126.0602 (a) (2) a Planned Development Permit (PDP) allows for a use that "complies with the applicable land use plan but contains uses that are not permitted in the underlying base zone." Refer to DEIR Chapter 3 and Section 5.1 for further information.

I2-5

Construction of the project would not double the amount of greenhouse gas (GHG) emissions in the local area or region. As demonstrated in DEIR Section 7.1.5, *Greenhouse Gas Emissions*, the project would generate less GHG emissions than the 52 residences that are allowed on the project site under the current zone (as shown in DEIR Tables 7-7 and 7-8). In addition, the project

Comments

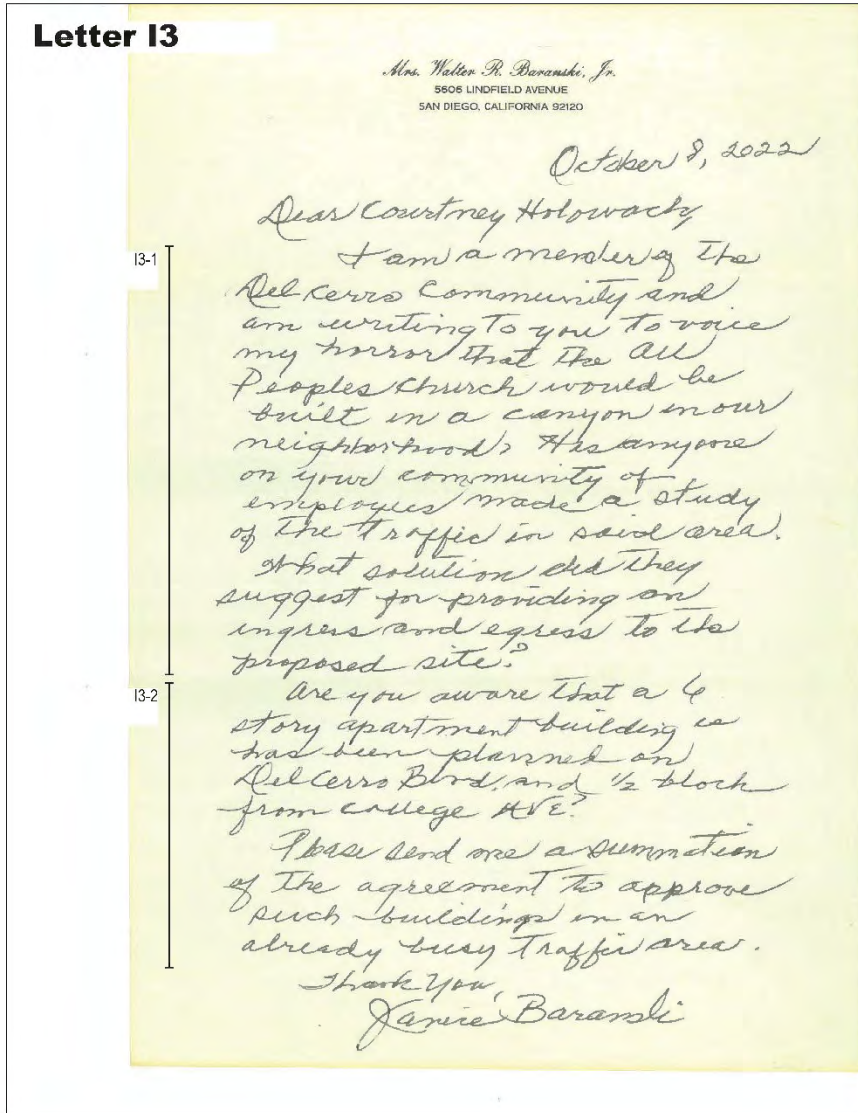
Responses

would not result in significant GHG emissions and would be consistent with the City's Climate Action Plan (CAP) by complying with the GHG emissions reduction strategies outlined in the project's CAP Consistency Checklist (refer to DEIR Appendix B). Furthermore, a VMT screening analysis was conducted (refer to DEIR Appendix K), which concluded that the project would be presumed to have less than significant VMT impacts, as described in transportation Master Response 5 regarding VMT. Therefore, the project is consistent with the City's CAP and related policies and impacts would be less than significant.

Comments

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3.1.3.3 Letter I3: Janice Baranski



I3-1

Refer to Master Response 6 regarding general opposition to the project, as well as the transportation Master Response 5 regarding Vehicle Miles Traveled (VMT) Assessment and Local Mobility Analysis (LMA). As stated throughout the DEIR, a new traffic signal would be constructed at the main ingress/egress to the church/sanctuary site and a second right in-right out driveway would be installed north of the signalized intersection.

I3-2

Refer to Master Responses 2 and 5 regarding cumulative impacts and the LMA.

Comments

Responses

3.1.3.4 Letter I4: Steve Behar

Letter I4

From: [Steve Behar](#)
To: DSU-EAS
Subject: [EXTERNAL] All Peoples Church/ 636444
Date: Thursday, September 1, 2022 6:53:25 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

I4-1 Dear City Leaders,
After having carefully read the Environmental Impact Report for the All Peoples Church project (636444), I feel strongly that the city should deny this project. Open space, and the concomitant biological resources in that area need to be preserved. Please deny this project

Steve Behar, Del Cerro resident
6254 Caminito Buena Suerte
San Diego, CA 92120

I4-1

Comment noted. Refer to Master Response 1 regarding the alternative land use for the site. Impacts to biological resources are discussed in DEIR Section 5.2. Based on the analysis contained in the DEIR, the project would implement mitigation to reduce impacts to biological resources to a less-than-significant level.

Comments

Responses

3.1.3.5 Letter I5: Linda and Michael Bennett

Letter I5

From: Michael Bennett <mabennett7@cox.net>
Sent: Wednesday, October 12, 2022 7:02 AM
To: DSD EAS <DSEAS@sandiego.gov>
Subject: [EXTERNAL] Environmental Impact Report for All Peoples Church (#636444)

We would like to add our concerns to this report.

- I5-1 | The biggest impact we fear from the building of this church at this site is the traffic increases which will necessarily follow.

When the development was proposed, the church itself was to be the only contributor to the increased traffic. It would have its greatest impact on Sundays or holidays.
- I5-2 | Now, not only is the church to add to our traffic problems, but we understand that a high rise apartment building is to be built on Del Cerro Blvd. between Marne Ave. and Madra Ave. The plan calls for multiple units with parking and retail businesses on the ground floor. It is currently unclear how much additional traffic this project will add on its own.
- I5-3 | Unless the City is planning another signal light intersection 100 yards or so from Del Cerro Blvd. to handle the traffic from the church the cars will need to use adjacent city streets to enter and exit the property. These are not wide streets; but, rather, typical city streets. If the City is planning on a signal controlled intersection south of Del Cerro Blvd, it would mean southbound traffic on College Ave. would travel about 100 yards past Del Cerro Blvd. before possibly having to stop at this new intersection. In the mornings and evenings the heavy traffic stopped at this new intersection would likely block traffic east and west on Del Cerro Blvd. before clearing.
- I5-4 | We realize that this new development was not anticipated when the All Peoples Church proposal was first made.

I5-1

Project traffic is addressed in DEIR Section 7.1.12. The analyses conducted for the project show that it would not result in significant impacts related to vehicle miles traveled (VMT) and local circulation (upon implementation of intersection, sidewalk and bike lane improvements described in the DEIR Section 3.2.5 from the Local Mobility Analysis [LMA]).

I5-2

Refer to Master Responses 2 and 5 regarding cumulative impacts and the LMA. Master Response 5 also provides more detail regarding how the VMT analysis is cumulative consistent with the Office of Planning and Research guidance for assessing transportation impacts under CEQA.

I5-3

A new traffic signal would be installed along College Avenue south of the Del Cerro Boulevard intersection, as described in the DEIR, and would function in accordance with City standards. The claims made in this comment are speculative and not supported by the evidence. CEQA Guidelines Section 15145 prohibits speculation in an environmental analysis. Refer to Master Response 5 regarding the College Avenue operational changes.

I5-4

Refer to Master Response 2 regarding cumulative impacts.

Comments

Responses

15-4
(cont.) ↑ We think it is important that this new development be included in the environmental impact considerations.

Thanks for your consideration.

Linda and Michael Bennett
5543 Trinity Way
San Diego, CA 92120

619-583-6036

Comments

Responses

3.1.3.6 Letter I6: John Benz

Letter I6

From: John Benz <johnbenz@cox.net>
Sent: Monday, October 17, 2022 9:40 AM
To: Holowach, Courtney <CHolowach@sanidiego.gov>
Cc: CouncilMember Joe LaCava <JoeLaCava@sanidiego.gov>; Councilmember Jennifer Campbell <JenniferCampbell@sanidiego.gov>; Councilmember Stephen Whitburn <StephenWhitburn@sanidiego.gov>; Councilmember Monica Montgomery Stepe <mmontgomerystepps@sanidiego.gov>; CouncilMember Marni von Wilpert <MarnivonWilpert@sanidiego.gov>; CouncilMember Raul Campillo <RaulCampillo@sanidiego.gov>; CouncilMember Vivian Moreno <VivianMoreno@sanidiego.gov>; CouncilMember Sean Elo-Rivera <SeanEloRivera@sanidiego.gov>; info@kentleeforsd.com <info@kentleeforsd.com>
Subject: [EXTERNAL] All Peoples Church project

Dear Courtney and City Counsel members,

16-1 I wanted to take a moment to discuss the upcoming Environmental Impact Report for the All Peoples Church in Del Cerro.

If you have visited this location site, you will immediately see that the property is jammed up against homes on the East, a Chevron station to the North, College Ave to the West, and Hwy 8 to the South. The congregation is estimated to be close to 1000 people. Many of the congregation will be traveling long distances to attend services. The State of CA and the City of SD is concerned about greenhouse gas emissions. This does not improve air quality, especially in Del Cerro. And let's be honest, people will not be taking the trolley or bus to get to church on Sunday.

16-2 Secondly, the City is concerned about housing. Prior to the Church purchase of this property, it was scheduled to have a 24 house development project to be built. SD can use more homes built. There are already several houses of worship in Del Cerro and a Temple across from the property as well.

16-3 Third, RS 1-7 zoning disallows religious assembly without General Plan Amendment. The Navajo Community Plan does not incorporate it also.

16-4 The community of Del Cerro is against this proposed plan to build All People's Church. Please vote NO on its approval.

Best regards,
John Benz
Del Cerro resident

16-1

The environmental setting for the project is described in detail in DEIR Chapter 2. As noted in the DEIR, the project would not have significant impacts on air quality or greenhouse gas emissions. These comments do not provide any specificity with regard to the contents or conclusions reached in the DEIR; no additional response is required.

16-2

Building housing is not one of the project objectives listed in DEIR Chapter 3. The 24-unit residential subdivision that was previously approved on site is described in the Reduced Residential Alternative and it would have similar significant impacts as the church/sanctuary project as discussed in DEIR Chapter 8. The need for the project and residential housing needs are addressed in Master Responses 3 and 6.

16-3

As stated in DEIR Section 3.4, approval of the Community Plan Amendment allows a religious assembly use on the project site. Pursuant to San Diego Municipal Code Section 126.0602 (a) (2) a Planned Development Permit (PDP) allows for a use that "complies with the applicable land use plan but contains uses that are not permitted in the underlying base zone." Refer to DEIR Section 5.1 for further information.

16-4

General opposition to the project is noted and is addressed in Master Response 6 on that topic.

Comments

Responses

3.1.3.7 Letter I7: Deborah Black

Letter I7

From: Deborah Black <debeebblack@gmail.com>
Sent: Tuesday, October 11, 2022 5:41 PM
To: DSD EAS <DSD EAS@sanidiego.gov>
Subject: [EXTERNAL] Project Name: All People's Church.. Project # 636444

To Whom It May Concern,

I7-1 I am writing this email to express my concerns about the proposed "All People's Church" being built in my neighborhood. Many of my neighbors and I feel that This project will have many negative effects on our neighborhood.

Much of this community was built in 1956 and the traffic plan and improvements have remained the same even as our community has grown.Traffic is already too crowded during peak hours. The traffic study was done during a time when Covid kept people in their homes and SDSU was on a vacation break. The "All People's Church" will surely add so many more vehicles to an already existing traffic mess.

The church will not only have traffic on Sundays. The plan has proposed a gym, school classrooms and offices. All of these will have people coming and going from the church adding to the already overcrowded traffic.

I7-2 The noise pollution caused by the amount of cement structures being proposed and the sound bouncing off of the structures will be tremendous.

I7-3 Many of us living here are Christian, but the last thing we want to drive up to see are three gigantic crosses on that hill. All other religions are not being represented and that is not showing religious equality.

I7-4 This proposal will also have biological repercussions to the area affecting our natural environment's plant and animal life.

I7-5 I ask you not to approve this project which WILL negatively affect our beautiful neighborhood which we have made our home.

Thank You,
Deborah Black
5651 Raymar Ave
San Diego, Ca 92120

I7-1

These comments do not provide any specificity with regard to the contents or conclusions reached in the DEIR; no additional response is required. The data collection for the traffic studies was conducted in 2019, when school was in session and prior to traffic changes related to COVID-19 restrictions. No school is proposed onsite. Refer to DEIR page 3-2 which states that no primary educational school spaces are included as part of the project.

I7-2

This comment lacks specificity and directly conflicts with the findings contained in the DEIR noise analysis that show project operations would comply with the City's Noise Ordinance, and temporary noise impacts would only occur during the construction period. Mitigation would be incorporated into the project to control construction noise and reduce impacts to less than significant.

I7-3

This comment expresses an opinion and does not address the content or conclusions reached in the DEIR.

I7-4

DEIR Section 5.2 addresses the project's impacts on biological resources, which would be mitigated and reduced to less than significant in accordance with the City Biology Guidelines.

I7-5

General opposition to the project is noted and is addressed in Master Response 6 on that topic.

Comments

Responses

3.1.3.8 Letter I8: Dennis Black

Letter I8

From: Dennis Black <denblack@gmail.com>
Sent: Sunday, October 16, 2022 11:28 PM
To: DSD EAS <DSD EAS@san diego.gov>
Subject: [EXTERNAL] All People's Church/ No. 636444

Dennis Black
denblack@gmail.com

- 18-1 | My concerns with the EIR start with the premise that paid professionals get paid to craft a EIR that will satisfy the planning department's criteria for a good and compliant plan.
- 18-2 | I don't believe I could provide evidence as to its accuracy or truth, but common sense does.
A small neighborhood church of 900 with plans to use it's new, \$13 million dollar, 54,476 sq.ft church, with a 71,010 sq.ft.2 story parking garage, for only a couple hours on Sunday, does not ring true.
Starting with that single fact, you need to question all of the facts they are claiming.
Many of the traffic studies that deal with ADT were numbers given to Justin Rasas of LOS Engineering,Inc. by the church.
His analysis was based on the plans the All People's Church gave him.
His numbers for week days being 280 total trips without mentioning any Saturdays trips. 280 trips is only a total of 140 cars in and 140 out of the property in 5 days. So 28 people per day will drive onto the property each weekday. After the Pastor, his secretary, custodial staff, gardeners, delivery drivers, mailman, Amazon, Fedex, UPS, that is eleven people so far. Only 17 trips left for counselors, clergy, parishioners, and repairmen. Common sense tells you that nobody puts in an intersection with traffic lights for so few people.
- 18-3 | This Church is designed as a very active, growth oriented, evangelistic, performance based group with worldwide missions.The sermons the church posted on their website, were proof of that. They are competing with The Rock Church so they belong in a commercial area with more than a single street access.
Once they build, the city has no say in how many parishioners they have, the number of music concerts or theater productions they have. Or the time of day they have them.
- 18-4 | 3.3.1... Site prep and demo.. 12-14 months? probably 24mo. Allowing 12hr work days 6 days a week is pretty pushy for moving into a single family neighborhood that doesn't want you. There should be no Sunday or Saturday work and only 7am - 5pm Monday - Friday. All maintenance on heavy equipment and trucks can be performed between 5pm-9pm Monday - Friday only.
2 years of nonstop construction noise is not fair to the community.
- 18-5 | 3.4.5... No additional traffic signal should be built on College Ave. College Ave south bound from Del Cerro Blvd , backs up all the way up the hill to Rockhurst Dr on weekdays. North bound College Ave from SDSU is backed up to Del Cerro Blvd from traffic dropping off students at Patrick Henry HS. Patrick Henry is the largest HS in the San Diego Unified School District. The attendance Area Map for 2022-2023 is on San Diego Unified School District website. Students south of interstate 8, between Hoover and Crawford, and all the way east to Reservoir Dr, and south to El Cajon Blvd., use College Ave through Del Cerro, to commute to Patrick Henry. Any traffic studies done during the Covid lock down or when schools were out of session for spring break , winter break would not be accurate. Still many people are working online from home. More businesses are finding issues with working at home and are requiring employees to return to the office. Traffic will not decrease, only increase in the future.
- 18-6 | With all the dump trucks and equipment leaving the All People's Church site starting at 7am, College Ave and Del Cerro Blvd will be gridlocked and Fire Station # 31 will have response problems anywhere south of Del Cerro Blvd and both east and west bound interstate 8.
- 18-7 | 5.2.1.5. Sensitive Animal Species. If you couldn't find a Red Diamondback or a Coastal Horned Lizard in the canyon, you didn't look hard enough or at the wrong time of year. They have lived in that canyon since I hunted for them decades ago. Boys would still be finding them if they got off their cell phones and got dirty. Probably

18-1

Comment noted but it does not address the adequacy or content of the DEIR.

18-2

Refer to Master Response 5 regarding trip generation. The data and reports comply with the guidelines in the City's Transportation Study Manual. As stated in Master Response 5 regarding the Local Mobility Analysis (LMA), the report was used to identify the project's infrastructure improvements, rather than to assess project impacts under CEQA. The LMA conducted for the project determined that a traffic signal is warranted based on the volume of trips in and out of the facility from College Avenue. Refer to Master Response 5 regarding the College Avenue operational changes.

18-3

The project includes a sanctuary with up to 900 seats with accessory uses (i.e., Sunday school classrooms, offices, and a multipurpose room/gym). Changes to the project would require an amendment to the permit, triggering a new discretionary review.

18-4

The construction phase is proposed as detailed in the DEIR and would be conducted in accordance with the hours limits contained in City Noise Ordinance. In addition, Mitigation Measure NOI-1 requires written notification of the construction schedule at least 24 hours prior to initiation of the construction activities. The neighborhood concerns expressed in this comment are noted.

18-5

The traffic signal is required as outlined in the LMA contained in DEIR Appendix J. The data collection for the traffic studies was conducted in 2019 when school was in session and prior to traffic changes related to COVID-19 restrictions.

Comments

Responses

18-6

A traffic control plan would be required by the City prior to the commencement of the construction activities. The plan would address any site-specific controls needed to maintain access to/from and through the area. As noted in Response to Comment A2-2, the traffic control plan would be provided to Caltrans as well.

18-7

According to the project's Biological Technical Report (DEIR Appendix C), vegetation mapping and a jurisdictional delineation were conducted on site on October 14, 2014; vegetation mapping was confirmed on April 3, 2019; and sensitive plant surveys were conducted on April 9, 2015, and April 3, 2019. As noted in Table 5 of the appendix, neither species was observed on site and both have a low potential to occur. The project site was heavily graded and disturbed in the 1960s during the installation of College Avenue and widening of the freeway (I-8). Although vacant, development has historically occurred on the property, which is surrounded by developed land and large roadways.

Comments

Responses

18-7 (cont.)	more of them now than 30 years ago. Before the church and Marburn projects, nobody but a few would hike down there. It has mostly been open space for 65 years.
18-8	Fig 2-5 Site photo.. ECORP 2020 & 2021... You can see how lush and green the trees and shrubs are.. They absorb both the freeway noise, and reflected heat. How any study about noise and heat could conclude that putting that huge 70,010 sqft 2 story parking structure, 54,476 sq ft church and 4 acres of blacktop, wouldn't significantly affect noise and heat. On a larger scale, the project would cause an "Urban Heat Island" Common sense will tell you the truth.
18-9	I won't go on further. Please dump this bad project. For 66 years the canyon has survived all attempts to build in it. Access to the property by removing houses on Marne failed. Modifying College Ave. with left turn lanes failed. The disruption of traffic on College Ave always blocked the development. Every San Diego planning board has denied development in the canyon for the past 60 years until the Marburn project. The fact remains that the All Peoples Church bought a piece of property zoned for a housing development. NOT a Church. And it looks like if All People's don;t get a church, Marburn will go ahead with their project. Does that not fit the city's plans for more family housing? The Marburn housing project has been approved and needs to be built to help with the housing needs of the area.
18-10	The community should not suffer with a huge infill project at the same time as the 6 story Cerro House Project on Del Cerro Blvd. This will adversely impact all of Del Cerro, Allied Gardens, and San Carlos. Thank you for your time, Dennis Black denblack@gmail.com

18-8

The DEIR studies noise in Section 5.4 and concludes that the project would not result in operational noise impacts. Heat is not a topic required for discussion in a CEQA document.

18-9

This comment does not address the contents of the DEIR. General opposition to the project is addressed in Master Response 6. Development of housing on the project site is not a project objective as noted in DEIR Chapter 3; refer to Master Response 3 on the City's residential housing policy.

18-10

General opposition to the project is noted and addressed in Master Response 6 on that issue. Master Response 5 provides more detail regarding how the VMT analysis is cumulative in nature consistent with the Office of Planning and Research guidance for assessing transportation impacts under CEQA. Cumulative impacts analysis is addressed in Master Response 2.

Comments

Responses

3.1.3.9 Letter I9: Benjamin Bloom

Letter I9

From: Benjamin Bloom <benjaminbloom@gmail.com>
Sent: Monday, October 10, 2022 7:53 AM
To: DSD EAS <DSDEAS@san-diego.gov>
Subject: [EXTERNAL] Public comment re: All Peoples Church / Project No. 636444

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

via email

October 9, 2022
Ms. Courtney Holowach
City of San Diego Development Services Center
1222 First Avenue
MS 501
San Diego, CA 92101

Ms. Holowach,

I write to you today in reference to the Navajo Community Plan and environmental impact report: released August 31, 2022. **{Navajo} All Peoples Church / Project No. 636444 / Draft Environmental Impact Report / SCH No. 2021100394.**

I9-1 As a Del Cerro resident since 2015, I have seen various forms of proposed development for this land come and go. Unfortunately, the environmental impact report mistakenly ignores many of the most negative impacts to the surrounding community: traffic congestion and spillover of parking into neighboring residential areas. I urge that the development activity describe in the EIR be placed on hold and that the EOIR be revised to account for the significant disruption that this project will bring, for example:

- An extra traffic signal which will bring delays to an already busy College Ave, NB and Eastbound/WB Del Cerro Blvd.
- Potential safety hazards for traffic backups from the property that extend to the exit from I-8
- A fixed amount of parking with inevitable spillover into the surrounding residential neighborhoods.

These impacts are foreseeable but unlikely to be mitigated. Based on that analysis and opinion, I respectfully urge that this project go no further.

Sincerely,

Benjamin Bloom
Del Cerro homeowner
6051 Bounty St.
San Diego CA 92120

I9-1

The DEIR addresses the project's effects on traffic in Section 7.1.12. Refer to Master Response 5 regarding the College Avenue operational changes. No parking spillover into the community is anticipated because the proposed parking supply would exceed City requirements. Furthermore, parking is not a CEQA topic, and it is speculative to suggest that the parking needs of the church would not be met on site when the project exceeds the City's parking requirements. CEQA Guidelines Section 15145 prohibits speculation in an environmental analysis. Traffic safety impacts are not anticipated based on improvements proposed by the project. Refer to Master Response 6 regarding general opposition to the project.

Comments

Responses

3.1.3.10 Letter I10: Peggy Bocko

Letter I10

From: Peggy Bocko <peggy@bocko.com>
Sent: Friday, October 7, 2022 2:26 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church/636444

I10-1 | My issue with this project is the lack of ingress and egress. One way in and out isn't sufficient for this size of project in the event of emergency. I also believe that because of the time it takes to exit the property after an event or service that people will elect to park on neighboring streets or other parking areas which will effect those living in the area. As I recall this was an issue when the Rock Church opened in Liberty Station. Also, the proposed stoplight will effect traffic on College Avenue which is already very busy. This is not an appropriate sight for this project.

Thanks, Peggy Bocko

I10-1

The project proposes a traffic signal at the main entrance and a right-in/right-out secondary driveway north of the traffic signal. Parking is not a CEQA topic. Refer. to Master Responses 5 and 6 regarding general opposition to the project and College Avenue operational changes.

Comments

Responses

3.1.3.11 Letter I11: Katie Booth

Letter I11

From: Katie Booth <boothkatie@hotmail.com>
Sent: Monday, October 17, 2022 4:55 PM
To: DSD EAS <DSDDEAS@sandiego.gov>
Subject: [EXTERNAL] Re: All Peoples Church No. 636444

Project Name: All Peoples Church
Project No. 636444

To Whom It May Concern,

I11-1 | The All Peoples Mega Church Project is a looming cloud that the community of Del Cerro has been fighting against for years. I won't speak to the environment impact statistics as I know you've been made well aware of those in detail. We are a tiny close knit pocket left in the city of San Diego. People who live here cherish the small community of neighborhoods and existing schools and churches and small non chain store restaurants and grocery stores. There is nothing Mega about Del Cerro and that is the way things should stay. We are surrounded by large commercial and private developments from Mission Valley, and SDSU with an entirely new stadium and all that stands to change over the coming years that will filter in extra traffic and people. With those projects already funded and still in process we cannot account for the added impact those will have to nearby freeways/traffic and how that impacts our residents and community. This project is not intended to benefit our residents in any positive ways but will contribute to extra noise, traffic, and other pollutions. The space is intended to be used at their discretion to be sold out at every opportunity. It is not limited to quiet gatherings on a Sunday. The monstrosity of a massive building and huge parking structure could easily go anywhere in San Diego that would not mind it. Nearby Mission Valley has acres of commercial and currently vacant lots from closed car dealerships that could make for easy access for such a flagship church location. We are not mega, we can't handle mega we don't want mega so please leave our quaint community untouched. Not everything needs to be developed, some things are perfect the way they already are!

Passionately Yours,
Active School & Community Volunteer and Proud Home Owner in Del Cerro,
Katie Booth

I11-1

This comment does not address the content or adequacy of the DEIR. Refer to Master Responses 5 and 6 regarding transportation and general opposition to the project.

Comments

Responses

3.1.3.12 Letter I12: Chip Brent

Letter I12

From: Chip Brent <chip@sandiegoproperties.us>
Sent: Monday, October 17, 2022 8:26 AM
To: DSD EAS <DSDEAS@sanidiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sanidiego.gov>; CouncilMember Jennifer Campbell <JenniferCampbell@sanidiego.gov>; CouncilMember Stephen Whitburn <StephenWhitburn@sanidiego.gov>; Councilmember Monica Montgomery Steppe <mmontgomerysteppe@sanidiego.gov>; CouncilMember Marni von Wilpert <MarnivonWilpert@sanidiego.gov>; CouncilMember Raul Campillo <RaulCampillo@sanidiego.gov>; Councilmember Vivian Moreno <VivianMoreno@sanidiego.gov>; CouncilMember Sean Elo-Rivera <SeanEloRivera@sanidiego.gov>; Holowach, Courtney <CHolowach@sanidiego.gov>; Blake, Martha <MBlake@sanidiego.gov>
Subject: [EXTERNAL] San Diego: Mega Church in 92120

To The City of San Diego:

I12-1 I am a forty one year resident of the Del Cerra/Allied Gardens community and I am writing to voice my opposition, as many others in our community have expressed, over the project known as the All Peoples Church. I am a homeowner in 92120 since 1987. My wife and I settled here, raised our family and made life long relationships working as a husband and wife real estate team since 1984.

I was educated at SDSU (1976-1980) with a degree in geography and minor in economics. The emphasis was urban planning. I find just about everything of this plan to be a terrible use of what little "open space" we have left in the city. The specific parcel in question is a well needed buffer between highway 8 and the community. I also find the Environmental Impact Report (EIR) lacking for a number of reasons which was clearly articulated in this letter shared by Mr D.F. Schwartz, another member of the community.

Our city has a checkered past of poorly planned zoning changes that has left many parts of our city needing redirection in terms of density and services. Most prominently are the terrible effects of high density multiple family housing foisted on our city's central corridor from Park Blvd all the way to 70th street along El Cajon Blvd and University Ave. I refer to it as the "Ray Huffman effect". The name giving credit to the developer that mowed down many beautiful homes in those areas of our city and replaced them with apartments. The affect of which created transient populations that rely on cheap housing and access to employment, neither of which came about when reflecting back. And all as a result of "up-zoning" without much foresight.

I understand the use of zoning polices and land use variances to steer our community towards a better future. The project in question is NOT in line with the current use. The changes that will take place will no doubt result in many negative conditions, and not many if at all, positive.

I am asking that this project get a MUCH CLOSER look so this part of the city NOT suffer the results of myopic planning like your previous counsel members approved.

Chip Brent
Broker/Owner: San Diego Properties
619-840-2447
Chip@SanDiegoProperties.us
CA DRE lic# 00817374 (yes, since 1981)
<http://www.sandiegoproperties.us/>

I12-1

This comment does not address the content or adequacy of the DEIR. Refer to Master Responses 3 and 6 regarding general opposition to the project and land use policy consistency.

Comments

Responses

3.1.3.13 Letter I13: Cameron Bresnick

Letter I13

...

[EXTERNAL] Refusal of project 636444

Retention: Inbox

Cameron Bresnick <cameronbresnick@yahoo.com>
To: DSD EAS Wed 9/7/2022 4:27 PM

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I13-1 | We are refusing/ and are against the All People Church Project #636444 because it would result in significant changes to the area.

Sent from my iPhone

Reply Forward

about:blank

I13-1

This comment does not address the content or adequacy of the DEIR. Refer to Master Response 6 regarding general opposition to the project.

Comments

Responses

3.1.3.14 Letter I14: Janis Brown

Letter I14

From: Janis Brown <eldjibrown@cox.net>
Sent: Friday, October 14, 2022 1:54 PM
To: DSD EAS <DSD EAS@sandiego.gov>
Subject: [EXTERNAL] All People's Church/No 636444

Project name: All People's Church
Project number: 636444

Hello,

I wanted to write to you and let you know I do not think the All People Mega Church should be in the community of Del Cerro . For a few reasons.

I14-1 I know things change and evolve. I am open to change when it makes sense. I am okay with building living space for families and/or studios for rent or for sale. I have three daughters and would love for them to be able to live near by. Increasing housing would help with the supply and demand. Even then traffic would be at each persons schedule which in turn would not be heavy at one time.

Unlike, the case of the Mega Church. This would impact the intersection and the freeway areas with heavy traffic all at one time. It would impact me when doing errands and traveling to work. I knew SDSU would have concerts and events that would impact me. I am okay with that. They have been here long before me. But to add another large event place to the community would be damaging.

I also believe we have enough places of worship and or churches in our community already. The community of Del Cerro has been established for many years and has everything needed for our residents.

Please think about my concerns. On why I am against the mega church in this location. I drive to Point Loma often and I hit the Rock traffic. I already work around SDSU events and every day student/faculty traffic and I am okay with that. I just think adding Mega Church is just too much traffic to add to our area.

Thank you for your time,
Janis Brown
5944 Ridgemoor Dr
San Diego, Ca 92120
Cell 619-517-7063

I14-1

This comment does not address the content or adequacy of the DEIR. Refer to Master Response 6 regarding general opposition to the project. Traffic impact uses the VMT metric and is presumed to be less than significant using the ADT screening criteria in the Transportation Study Manual. Traffic operational changes in the area are addressed in the Local Mobility Analysis (DEIR Appendix J).

Comments

Responses

3.1.3.15 Letter I15: Christina Callahan

Letter I15

From: Christina Callahan <christina.callahan@rocketmail.com>
Sent: Monday, October 17, 2022 4:45 PM
To: DSD EAS <DSD EAS@sanidiego.gov>
Subject: [EXTERNAL] All people church

Hello,

- I15-1 | My comment is that ingress egress has not been resolved for fire or emergency services, particularly as it's adjacent to WUI. The last time this went around, the fire chief specifically stood up against building in this location. It's too high risk and city services cannot provide safely or adequately to standard.
- I15-2 | As a community resident, the Navajo plan specifically states to not build on finger canyons. This will negatively impact drainage and watershed, with a higher impact on sewers and urban runoff. The build does not meet the landscape, what with the cantilevered design and immense parking requirements. As the City eliminated minimum parking within certain zones, if this project meets those requirements, the impact on surrounding neighborhood is many times multiplied - people still drive and park, despite the public transportation dream.
- I15-3 | There should not be an exception made to the zoning for this project. There are many locations on vacant lots within a three mile radius that would suffice their architectural plans and revitalize and serve neighborhoods, particularly in Granville and down in university where their location is currently. I appreciate they want a massive lit sign on the freeway, but that is not reason enough to approve.
- I15-4 | Please consider 'smart design' and urban infill, instead of the immense impact environmentally, socially, and aesthetically degradation on one of the few remaining finger canyons, for this project.

Thank you for considering denying this zoning change.

Kindly,
Christina Callahan
5672 Linfield Ave

I15-1

The project site plan was reviewed by City Fire and Rescue Department as part of the discretionary review process. No impacts to City public services are identified in DEIR Section 7.1.11.

I15-2

All of the applicable policies from the Navajo Community Plan are contained in revised DEIR Table 5.1-2. Contrary to this comment, no policy specifically restricts construction on finger canyons. The project would result in less than significant drainage and watershed impacts as discussed in DEIR Sections 7.1.7 and 7.1.14 due to the proposed drainage features being constructed on site. The structures would be recessed into the landscape with the church placed in the southern portion of the site as far away as possible from the closest residential homes. The proposed supply of parking would exceed the City parking standards by 37 spaces. Parking is not a CEQA topic, and it is speculative to suggest that the parking needs of the church would not be met on site given that it is proposing to construct more supply than required by the City.

I15-3

The underlying zoning of the project site is not changing. The City does not have a zone classification for church or religious institutions. As stated in DEIR Section 3.4, approval of the Community Plan Amendment allows a religious assembly use on the project site. Pursuant to San Diego Municipal Code Section 126.0602 (a) (2) a Planned Development Permit (PDP) allows for a use that "complies with the applicable land use plan but contains uses that are not permitted in the underlying base zone." Refer to DEIR Section 5.1 for further information. Refer to Master Responses 1 and 3 addressing land use policy consistency and alternative locations for the project. No large signs are proposed as part of the project design.

I15-4

Comment noted; refer to Master Response 6 regarding general opposition to the project.

Comments

Responses

3.1.3.16 Letter I16: Elaine Camara

Letter I16

From: Elaine Camara
To: DSU EAS
Subject: [EXTERNAL] All Peoples Church - no. 636444
Date: Tuesday, October 4, 2022 3:46:42 PM

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I16-1 | We live on Lancaster Dr in Del Cerro and we are adamantly opposed to the construction of this major project. This will impede traffic in our area which we can not handle.
| this is a horrible idea for our area!
| Thanks you
| Elaine Camara

I16-1

This comment does not address the content or adequacy of the DEIR. Project transportation impacts are addressed in DEIR Section 7.1.12. Traffic impact uses the VMT metric and is presumed to be less than significant using the ADT screening criteria in the Transportation Study Manual. Traffic operational changes in the area are addressed in the Local Mobility Analysis (DEIR Appendix J). Refer to Master Response 6 regarding general opposition to the project.

Comments

Responses

3.1.3.17 Letter I17: Gregg Cantor

Letter I17

From: Gregg Cantor <gcantor@murraylampert.com>
Sent: Sunday, October 16, 2022 3:49 PM
To: DSD EAS <DSEAS@sandiego.gov>
Cc: Abalos, Raynard <RAbalos@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; Councilmember Jennifer Campbell <jenniferCampbell@sandiego.gov>; Councilmember Stephen Whitburn <StephenWhitburn@sandiego.gov>; Councilmember Monica Montgomery Steppe <mmontgomerysteppe@sandiego.gov>; CouncilMember Marni von Wilpert <MarnivonWilpert@sandiego.gov>; CouncilMember Raul Campillo <RaulCampillo@sandiego.gov>; Councilmember Vivian Moreno <VivianMoreno@sandiego.gov>; CouncilMember Sean Elo-Rivera <SeanEloRivera@sandiego.gov>; info@kentleeforsd.com <info@kentleeforsd.com>; savedelcerro@gmail.com <savedelcerro@gmail.com>
Subject: [EXTERNAL] All Peoples Church - Project no. 636444 - SCH No. 2021100394 - Navajo - District 7

Dear DSD & Councilmembers and Navajo Planners,

I17-1 As a native San Diegan, owner of a 4-generation local business and lifelong Del Cerro resident, I'm writing to you in opposition of All Peoples Church/No. 636444.

Our family has been longtime supporters of the San Diego Community including Del Cerro, Allied Gardens and San Carlos. We have contributed and volunteered to/for many great events and causes in our area including Make-A-Wish, SDUSD, Patrick Henry High School, Lewis Middle School, Hearst Elementary and District 33 Little League.

The All Peoples Church project is not good for our community and we stand behind the many other residents who oppose the development for these reasons:

The land was already approved for a 24-unit housing project. San Diego needs more housing and the Del Cerro area does not need another religious institution, especially one that is expected to bring most of its attendees from outside our area.

According to San Diego Municipal Code, Table 131-04B, RS 1-7 zoning does not allow for religious institutions.

Besides the negative impact on biological resources, historical resources, noise and tribal resources, the location is situated where the infrastructure can not handle the amount of traffic this development will create. The modification of the North and Southbound lanes of Collage Avenue, adding another traffic signal, would severely impact the traffic in our Del Cerro community. It will also significantly increase greenhouse gas emissions in the area.

It is our hope that the Planning Department, Navajo Planners and City Council all vote against the plan for All Peoples Church.

Sincerely,

Gregg Cantor
President/CEO
Murray Lampert
Design - Build – Remodel
2851 Camino Del Rio South, Suite 310
San Diego, CA 92018
Office Phone: 619.285.9222 Ext. 318
Fax: 619.285.9794

I17-1

This comment does not contain specific comments on the content or adequacy of the DEIR. The comment does not address the adequacy of the DEIR; refer to Master Responses 1 and 6 regarding general opposition to the project, alternative location or use of the site, and need for the project.

Building housing is not one of the project objectives outlined in DEIR Chapter 3. The 24-unit residential subdivision that was previously approved on site is described in the Reduced Residential Alternative and it would have similar significant impacts as the church/sanctuary project as discussed in DEIR Chapter 8.

The San Diego Municipal Code (SDMC) Section 126.0602 (a) (2) allows projects to propose a Planned Development Permit to allow a use that is permitted by the land use plan but not allowed by the underlying zone. That process is what is proposed to permit the church on a residentially zoned site. The City does not have a zone classification for church or religious institutions. Refer to Master Response 3 regarding land use policy consistency as it relates to this comment on zoning.

Project impacts associated with biological resources, historical resources, noise and tribal cultural resources were determined to be less than significant, with incorporation of mitigation measures, as discussed in DEIR Sections 5.2, 5.3, 5.4, and 5.6. The project's transportation impacts were determined to be less than significant in DEIR Section 7.1.12, as would be the greenhouse gas (GHG) emissions impacts described in DEIR Section 7.1.5.

Refer to Master Response 6 regarding general opposition to the project.

Comments

Responses

3.1.3.18 Letter I18: James Carry

Letter I18

From: James Carry <james.carry@att.net>
Sent: Saturday, October 15, 2022 11:43 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] ALL PEOPLES CHURCH

RE: All Peoples Church No. 636444 SCH No. 2021100394 Community Plan: Navajo Council District 7

I18-1 | This proposed "Church" is actually a homeless shelter in disguise. We don't want or need a homeless shelter in our neighborhood. The traffic jams will be monumental and the property values will suffer. It will take a quiet, suburban neighborhood into a crowded inner city atmosphere, which is antithetical to the environment that we chose when we moved here.

James Carry

I18-1

Refer to Master Response 6 regarding general opposition to the project.

Comments

Responses

3.1.3.19 Letter I19: Jordan Chaim

Letter I19

From: Jordan Chaim <jkchaim@gmail.com>
Sent: Thursday, October 13, 2022 9:40 AM
To: DSD EAS <DSD EAS@sandiego.gov>
Subject: [EXTERNAL] Resident Comment: All People's Church, Project No. 636444

Dear Courtney Holowach,

I19-1 My family and I live in Del Cerro and recently received and reviewed the environmental impact report for the proposed All People's Church Project, No. 636444. I write to express our continued opposition to this project. In addition to the irrevocable changes any project of this size would make to the character and functionality of our quiet residential neighborhood—and the travesty that it would be to repurpose land zoned for urgently needed housing for yet another mega church—I would like to respond directly to the significant environmental effects determined by your report.

I19-2 The biological impacts of a project this size will have a profound and lasting effect on our environment, and in a city as progressive as San Diego, we must continue to protect our remaining green space. The costs of destroying habitat for local flora and fauna, and of adding another massive concrete structure to a region acutely feeling the effects of climate change and environmental destruction seems incredibly short-sighted and dangerous. If perhaps this was a housing complex, as it was initially proposed, that would be different, since we are in the midst of an undeniable housing crisis, but I do not believe this project is worth the irrevocable damage it would do.

Thank you so much for your time and attention,

Jordan Karney Chaim, PhD
(she/her)
jordankarneychaim.com

I19-1

Refer to Master Responses 4 and 6 regarding general opposition to the project and neighborhood character. Contrary to statements made in this comment, the project would not result in significant neighborhood character impacts and would not preclude the City's ability to address the housing situation. Refer to Master Response 3 on the City's residential housing policy.

I19-2

The project site is not a pristine wilderness or dedicated open space. Instead, it is a vacant parcel that has been previously disturbed by the construction of developments on all sides of the property, including I-8, College Avenue and the adjacent residential neighborhood. In addition, the property is planned for future development in both the General Plan and Community Plan. Due to its past disturbance and location surrounded by urban development and regional infrastructure (i.e., College Avenue and I-8), the quality of on-site habitat is poor and isolated from regional open space systems. Project impacts to biological resources would be potentially significant and mitigated to less than significant as explained in DEIR Section 5.2.

Building housing is not one of the project objectives. The 24-unit residential subdivision that was previously approved on site is described in the Reduced Residential Alternative and it would have similar significant impacts to biological resources as the church/sanctuary project as discussed in DEIR Chapter 8.

Comments

Responses

3.1.3.20 Letter I20: Shari and Joseph Colloca, Robin Kastner, Maureen Champion, Rosemary and Victor Ghosn, Adeline and Yann Renard, Hortencia and Ted Bendrick, Wendy and Dustin Jones, Amy and John Pecoraro, Kathy and Bill Connell, Diana and Rich Sanderson, Deborah and Dennis Black, Danielle Black, Kelly and Matt Rookus, Denine and Larry Dawson, Stephanie and Chad Summers, Sara Moten and Karla and Dan DeCoursey, Christine and Ryan Dammann

Letter I20

From: Joseph Colloca <colloca7@gmail.com>
Sent: Monday, October 17, 2022 12:10 AM
To: Holowach, Courtney <CHolowach@sanidiego.gov>; Blake, Martha <MBlake@sanidiego.gov>; DSD EAS <DSDFEAS@sanidiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sanidiego.gov>; Councilmember Jennifer Campbell <JenniferCampbell@sanidiego.gov>; Councilmember Stephen Whitburn <StephenWhitburn@sanidiego.gov>; Councilmember Monica Montgomery Steppe <mmontgomerysteppe@sanidiego.gov>; CouncilMember Marni von Wilpert <MarnivonWilpert@sanidiego.gov>; CouncilMember Raul Campillo <RaulCampillo@sanidiego.gov>; Councilmember Vivian Moreno <VivianMoreno@sanidiego.gov>; CouncilMember Sean Elo-Rivera <SeanEloRivera@sanidiego.gov>; info@kentleeforsd.com <info@kentleeforsd.com>
Cc: Robin Kastner <robink3@icloud.com>; Bigchez@cox.net <Bigchez@cox.net>; yann.renard@gmail.com <yann.renard@gmail.com>; tbendrick@sbcglobal.net <tbendrick@sbcglobal.net>; dubshieh@gmail.com <dubshieh@gmail.com>; Johnpecoraro1@yahoo.com <Johnpecoraro1@yahoo.com>; kathy.connell@gmail.com <kathy.connell@gmail.com>; Diana Sanderson <dianasanderson@cox.net>; Deborah Black <debeebblack@gmail.com>; danielle_marie_mail@yahoo.com <danielle_marie_mail@yahoo.com>; kellyrookus@gmail.com <kellyrookus@gmail.com>; Larry Dawson <calexicolaw@sbcglobal.net>; Stephanie Summers <stephanielsummers@yahoo.com>; Sara Moten <moten.sara@gmail.com>; Karla DeCoursey <kndecoursey@gmail.com>
Subject: [EXTERNAL] Comment/Response for Draft Environmental Impact Report - All People's Church Project 636444

Dear Ms Holowach, Ms Blake, Councilmembers, Development Services Dept :

I20-1 The All People's Church project Environmental Impact Report has been published with public comment period currently accepting response and comment.

We are a group of residents collectively submitting our comments for consideration and review. The cover letter and detailed content is attached in both Word and PDF format.

Thank you for consideration of our comments, observations, and positions on this community impact issue. It is our intent along with other individual comment responses and our Navajo Community Planners, Inc. response to shed light on what we collectively see as glaring misalignments in this project proposal and raise our community wide concerns to the awareness we feel is needed.

We will answer any questions or provide further elaboration on request.

Thank you -

Del Cerro Community Residents as signed in the attachments

I20-1

General opposition to the project is addressed in Master Response 6 on that issue in the FEIR. Specific responses to the comments raised in this letter are provided below in Responses to Comments I20-2 through I20-19.

Comments

Responses

October 16, 2022

City of San Diego Development Services Center
ATTN: Courtney Holowach cholowach@sandiego.gov
1222 First Avenue
MS 501
San Diego, CA 92101

CC: Martha Blake mblake@sandiego.gov
Development Services Dept dsdeas@sandiego.gov
JoeLaCava@sandiego.gov
JenniferCampbell@sandiego.gov
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info@kentleeforsd.com

RE: Comment/Response for Draft Environmental Impact Report
Project Name: All People's Church
Project Number: 636444

I20-2 To All Concerned:

We join with fellow residents and Navajo Community Planners, Inc in response to the City of San Diego's Draft Environmental Impact Report ("Report") dated August 31, 2022 for All People's Church project ("Project") 636444.

We reside in direct proximity to or bordering the proposed location of this Project. We have responded to the Report in full context using verifiable references, thorough discussion and review of Report findings, positions, and conclusions using empirical and/or fact-based examples for substantiation.

This Project in its immense scale is seeking departure from the Community Plan and replaces a currently-approved-and-extended residential single family home housing project.

The particularly unique circumstances accompanying Project approval would, we will show:
1) negate housing & climate priorities made clear by city officials to the public
2) ignore drastic departures in community plan implementation that will usher in permanent and significantly negative environmental impact to neighborhoods

We reject the Report's positions and conclusions in several key areas and will show the facts & reasoning by which the Report justifies those conclusions as wholly inadequate and often times contradictory.

I20-2

The project is seeking an amendment to the Community Plan and a Planned Development Permit, as permitted by procedures and policies contained in the General Plan and San Diego Municipal Code. Statements made in this comment are general and lack specificity as it relates to the content and conclusions reached in the DEIR.

Comments

Responses

- I20-3 | 5.1.1 Existing Conditions – This is in fact incomplete. It does not include in its consideration yet another new and major project in an adjacent parcel.

A second existing condition impacting all areas of the city as Council and Mayor have cemented into the public awareness and committed to take steps to mitigate is the housing shortage. The Project is being considered after replacing an existing and still-approved single family home project for the exact same land parcel.

A third existing condition is the [San Diego Municipal Code Table 131-04B](#). The Use Regulations table for Residential Zones specifically disallows religious assembly in RS 1-7 Zoning – which this Report confirms will be preserved even after Project completion. This is a glaring inconsistency, contradiction, and flat out violation of San Diego Municipal Code. Additional issue here is the Navajo Community Plan does not appropriately consider or incorporate the site designation of religious institutions and would need revision.
- I20-4 | 5.1-10 Community Plan Consistency – Project implementation is neither consistent nor adherent to the Community Plan. Not only is the Report contradictory and meandering in its justification which we will show below, but even if it is deemed for some reason to be consistent, that triggers violation of the Municipal Code as any consistency requires preservation of the RS 1-7 zoning.
- I20-5 | 5.5.4 Impact 2: Neighborhood Character – this large institutional, single mass structure severely degrades and will negatively impact long-established neighborhood character – again, this impact severity is dismissed out of hand in the Report and we will have a full discussion in context of why this Report’s conclusion and path to it is severely misguided and should be entirely rejected.

I20-3

Refer to Master Response 2 addressing cumulative impacts. Building housing is not one of the project objectives. The 24-unit residential subdivision that was previously approved on site is described in the Reduced Residential Alternative and it would have similar significant impacts as the church/sanctuary project as discussed in DEIR Chapter 8. The City’s residential housing policy is not a CEQA issue for consideration in the DEIR, as noted in Master Response 3 on that issue. With regard to the project’s consistency with City land use policy, refer to Master Response 3 on that matter.

I20-4

As stated in Response to Comment I20-2, the project’s approvals are permitted by procedures and policies contained in the General Plan and SDMC. The project’s consistency with the policies in the Navajo Community Plan is addressed in DEIR Table 5.1-2. Revisions to the table removing references to the residential character of the site are included in the FEIR in strikeout/underline. The residential zoning would continue to exist on the project site with the permits in place

I20-5

This comment provides a criticism of the neighborhood character analysis provided in the DEIR without any specificity. Refer to Master Response 4 for a response on the adequacy of the neighborhood character analysis contained in DEIR Section 5.5.

Comments

Responses

I20-6

The Report is quoted in this response and included in context as reference ... these Report quotes are easily identifiable in *red italics*. At times ***boldface red italics*** may be used. These are used in this response document to highlight a point or idea and not the original style of the Report.

Thank you for consideration of this response and public comment, following discussion and issues supporting analysis. We look forward to the response.

Sincerely,

Shari & Joseph Colloca
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icolloca7@gmail.com

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Stephanie & Chad Summers
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Sara Moten
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Karla & Dan DeCoursey
5602 Raymar Ave
khdecoursey@gmail.com

I20-6

Comment noted. No response required.

Comments

Responses

I20-7

5.1.1 Existing Conditions

The Report does not account for the new project – yet another architectural departure from this community’s personality – similarly sprung on Del Cerro after having been in the works for some time it turns out... the 114-unit multi-use residential/commercial complex – CerroHouse at Del Cerro Blvd & Marne Ave literally bordering the Project.

Project operations and environmental reports has to account for this contingency and combined impact to resident’s daily livability, but that impact is unaccounted for in the Report. This is not an insignificant administrative detail. The reality is these projects are not mutually exclusive, yet there is no contingency studies, consideration of their size/scope or mutual proximity. The area is neither zoned for nor intended to host these large scale, large building architectural engineering designs.

These projects by themselves will negatively impact this community, let alone as a combined force. The accurate existing conditions must include this new large project directly adjacent, but is not modeled or risk-assessed. To cast aside risks unchecked development with irreversible lasting negative impact to our daily lives.

I20-8

Housing

A significant existing condition and critical problem to overcome and committed to do so by San Diego Council, Mayor, public officials is a housing crisis and a need for more homes. This is an existing condition across all of San Diego per city government and housing groups.

The Project acquired the land parcel – somehow – from the previous project developer who obtained full Project approval for 24 single family homes. The Project Approval has recently been extended ... this would be a bulwark against a housing shortage where many families are seeking Single Family Homes in San Diego. We know many of them. This approved plan much closer aligned to Community Plan in scale, purpose, design and certainly is aligned with the City’s strategic call for more homes and housing options.

The All People’s Church Project is now planned for the same parcel zoned RS 1-7; this discredits and diminishes a stated city focus on housing. An approval under these circumstances displaces existing approved residential single family housing in exchange for a business opportunistically imposing itself into a community that it primarily does not serve as we’ll show in following pages.

It would also mean the City and Council will have voted AGAINST much-needed single family homes for families desiring options for them and AGAINST a step toward another housing solution for families preferring single family options to Cerrohouse apartment-style living. The question is whether this Project ought to be approved under these circumstances at this time for that particular land parcel.

To gloss over these issues is incomprehensible to our community. We submit that this Report Existing Condition section is incomplete, at odds with the reality on the ground and to reject its conclusions.

I20-7

Refer to Master Response 2 regarding cumulative impacts.

I20-8

The housing crisis is not an environmental impact. With regard to the project site, it would remain zoned for residential use. Refer to the Master Response 3 on residential housing policy.

Comments

Responses

I20-9 5.1-10. Community Plan Consistency

"With regard to the principal objective of the Community Plan to maintain, enhance and encourage residential housing, the project would maintain the existing residential land use designation and zoning on the site. A project objective is to provide a church-owned property for an existing congregation and would involve the construction of a non-residential, religious assembly use rather than housing. Accordingly, the project has been designed to be sensitive to the existing neighborhood."

"The Project would maintain the existing residential land use designation and zoning for the site". The institutional nature of the Project is physically represented by a massive 54,476 sqft monolithic building with a separate 71,000 sqft two-level 367-space parking structure.

These structures and the business purpose they support have nothing – zero – to do with encouraging residential housing or promoting residential single family homes either in intent or implementation.

The Report states the zoning will remain residential - on the paper documents! The actual end result which is all that really matters is a community saddled with two structural monstrosities, increasing traffic and traffic flow problems into and out of Del Cerro, and an architectural and land use departure from the whole reason the community is appealing to begin with. This is classic lip service to Community Plan... takes "not being worth the paper it's printed on" to an all-new level.

The Report even acknowledges a principal objective in the Community Plan is to "maintain and encourage residential housing" while in the next breath pledging its support for this goal by the symbolic carry-forward on paper of the residential zoning while the Project builds non-residential institutional buildings. Our collective heads are spinning wildly.

But that's not all. The Report comes full circle to use its own project objectives list (these are fully elaborated in context on p.8 in *red italic*), as a round-about justification for #4:

I20-10 4. Design the structures and site improvements to be sensitive to the existing topography and surrounding neighborhoods.

The reference to "site improvement" is not well-defined. Maybe the parking? Or a massive building? Perhaps it's the lush landscape of trees, plants, and shrubs... camouflage for the massive building and parking structure? The Project seems to deem "site improvement" as the Project's totality in fulfilling its own purposes. Nothing before → Now we're here doing our work with new buildings and landscape → Site improvement. This then appears to be welded somehow onto "community plan consistency" to support the conclusion it is *"sensitive to the existing neighborhood"*. It is not.

Back in the real world we live in, approval means a 900+ seat megachurch on a residentially zoned parcel, a 300+ space parking structure, zero housing, and Plan incompliance. The Report's ham-handed justification for consistency and sensitivity to existing neighborhoods flies in the face observable reality and impacts. In a unified voice we reject not only the abandonment of our Community Plan, but the bases of justification employed to do it.

I20-9

Refer to Master Response 3 on the project's consistency with the applicable policies from the General Plan, Community Plan and zoning regulations, which addresses the specific policy concerns expressed in this comment. The site's underlying land use designation and zoning would remain residential, as stated on DEIR page 5.1-10. The City does not have a zone classification for church or religious institutions. The DEIR discloses that a non-residential use would be constructed on site instead of housing; however, the analysis demonstrates that the church would comply with the applicable Residential Element policies in the Navajo Community Plan related to design. As described in the DEIR and Master Response 4 regarding neighborhood character, the project has been sensitively sited on the property. DEIR Section 5.5 discloses that the project's massing and architectural style would be distinctive from that of the surrounding one-story, ranch-style homes in the vicinity, but further notes that the project has been carefully designed to respect the residential character of the neighborhood.

I20-10

Site improvements are a general term used to describe the whole of the project's features, including buildings, paving, landscaping, utilities, and circulation elements. As stated above, the DEIR and Master Response 4 on neighborhood character both outline the rationale and significance determination criteria used for evaluating the project's visual impacts. The comment expresses an opposing opinion on the topic and provides no specific criticism of the DEIR analysis. General opposition to the project is addressed in Master Response 6.

Comments

Responses

I20-11 In Report's stated project objectives, #2 states,

2. Relocate to a church-owned property that has proximity to its existing congregation, including its members in City Heights, Mid-Cities, College Area, and Del Cerro.

"...has proximity to its existing congregation..." is a key objective of the Project per the Report's statements. The screen shot below was used by the Project's own traffic analysis representative in a meeting with this community on 12 OCT 2022 showing results of traffic analysis and projections based on meetings with the Project concerning its congregation & business plan.

There is an existing congregation, but it's not in Del Cerro and surrounding neighborhoods. There is no projected growth or focus here. This is crystal clear. 95% external... residents know if you go point to point in this area you don't go all the way to the freeway to do it.

The changes needed for such a massive structure plunging itself into a small residential community because a parcel of land fits their marketing plan are massively imbalanced.

The Project is a business. And this business is proposing to to set up shop in our community neither having grown up integral to it, nor invested in building any identifiable roots with its residents. This business seeks to use an acquired land parcel which is zoned residential now and was so at the sale of the parcel, change the zoning post-hoc to accommodate business purposes, and then go on to serve a community-based congregation of which 95% reside external to this community in which the Project would be located. We reject this Report postulation as non-evidenced and completely unbalanced in its application.

I20-12 Additionally, environmental concerns with VMT will effectively double GHGE as the travel on every day of the week will be from a distance. This is directly counter to the [Climate Action Plan](#).



I20-11

The existing church is less than 3 miles from the proposed location. Therefore, development of the project site would satisfy this objective, which does not indicate that the entire congregation hails from the Navajo Community Plan area. In fact, the figure provided from the presentation is consistent with the geographic description of the church's service area and congregation.

I20-12

Construction of the project would not double the amount of GHG emissions in the local area or region. As demonstrated in DEIR Section 7.1.5, the project would generate less GHG emissions than the 52 residences that are allowed on the project site (as shown in DEIR Tables 7-7 and 7-8). In addition, the project would not result in significant greenhouse gas emissions and would be consistent with the City's CAP by complying with the various GHG emissions reduction strategies outlined in the project's CAP Consistency Checklist (refer to DEIR Appendix B). Furthermore, a Vehicle Miles Traveled (VMT) screening analysis was conducted for assessing impacts under CEQA (refer to DEIR Appendix K), which shows that the project is presumed to not result in significant transportation impacts. The project is consistent with the City's CAP and related policies.

I20-13

Refer to response to comment I20-11, which references this figure.

Comments

Responses

I20-14

"With regard to the Residential Element policies, the site layout and architectural design incorporate careful planning and sensitive development features that: would create a well-defined, balanced and visually consistent design that is distinctive from the surrounding residential neighborhood; would be situated in the topographic low point of the site near the College Avenue off-ramp and setback from the adjacent, lower profile residential and commercial structures nearby;..."

A "well-defined, balanced and visually consistent design that is distinctive from the surrounding residential neighborhood." No. This characterization is simply ridiculous.

It is not "distinctive". It is wholly and entirely out of place.

Even a casual glance tells you this. Not one, but two colossal structures amid small single family residences. Distinctive? It's overwhelming. To maintain "balance and visual consistency" requires blocking out views incorporating the immediate surrounding homes and neighborhoods.

The physical imbalance obvious. Think of an aerial or eye-view at-scale picture of surrounding immediate neighborhoods with the Project design at scale inset into that neighborhood map. This is the perfect visual exercise we used to see in grade school test booklets, "Circle the object that doesn't belong..."

An 8 year old would ace that test.

The aforementioned "visual consistency" can only be realized in its own self-contained context because of the sheer difference in scale. Balanced? With what, exactly? The Report's position and statement that the Project balances with the surrounding neighborhood is a contradictory statement as we'll show in the next section of this reply.

I20-15

Additionally, there are three towers that range in height, but are all far beyond the existing and apparently permanent residential zoning height restrictions by 11'-17'. The Project presents the main building at/below height restriction and the towers are not intrusive; small architectural relief accents, not a big deal.

Disagree. These are not small towers – they are large structures that will block, impair and change the aesthetic looking in from College Ave, up and across from the I-8, and out from the neighborhoods. Regardless of position, from the largest impact is on the existing homes that look straight out and will see massive obstructions at and above line of sight.

The Project promotes the massive parking structure as "below grade along College Avenue" to appease concerns over visual, character, and environmental impacts, i.e. "It'll be mostly obscured", which doesn't appear to be the case in design. These towers, though, smashing through height restrictions need to be addressed.

The height restrictions exist for a reason. Zoning is already on the block of being completely upended, but to go further and salt it by vacating Plan height restrictions besides, all the while concluding Plan consistency and sensitivity ... that is an indefensible position. We reject this conclusion and characterization of the impact and visually consistent design.

I20-14

As discussed in the DEIR and Master Response 4 on neighborhood character, the majority of the church building would comply with the height limit established by the RS-1-7 residential zone, the exceptions being the three tower elements. The parking structure would be constructed entirely below the grade of College Avenue. Neither of the structures would block views of sensitive resources from the public right-of-way. Views from private homes referenced in this comment are not protected by City policy or recognized as a protected vantage point in CEQA. These comments provide general criticism of the analysis without considering the specific visual thresholds used by the City when preparing its CEQA documents.

I20-15

The comments provided herein express opinions. Refer to the responses provided above for comment I20-14. The towers are addressed both in terms of their environmental impacts in the DEIR and their consistency with the residential zone as part of the Planned Development Permit, pursuant to SDMC Section 126.0602 (a) (2). The SDMC allows applicants to propose deviations provided the applicable permit findings can be made.

Comments

Responses

I20-16

The Project's own objectives statement and institutional mission from the Report:

3.1.1 Project Objectives

The objectives associated with the project are as follows:

1. Place the church/sanctuary in a central San Diego location that is both visible from and convenient to a regional freeway to facilitate church attendance.
2. Relocate to a church-owned property that has proximity to its existing congregation, including its members in City Heights, Mid-Cities, College Area, and Del Cerro.
3. Establish a place of worship that would accommodate the space needs of its staff and congregation.
4. Design the structures and site improvements to be sensitive to the existing topography and surrounding neighborhoods.
5. Address the parking needs on Sundays by constructing sufficient parking to accommodate the maximum projected parking demand.
6. Develop the church/sanctuary near where transit connections are readily available to its congregation.
7. Enhance the religious, spiritual and community-building activities, including Sunday School and adult education, through the design and character of the indoor and outdoor spaces.
8. Fulfill the institution's religious mission to be a multi-ethnic, multi-generational local church with a global vision.

We disagree. The Project purchased this land opportunistically and fully of its own accord only post-hoc setting about the process of seeking accommodations, changes, exceptions, bypasses.

Residents on the other hand were taken by surprise with the approved project fading without a sound, sale of land completed, with an entirely new concept now in its place. The absence of announcements, flyers, notices, information sheet, or extended dialog – any outreach at all – created concerns about what was going on in our community and why we seemingly were being pushed into it. Residents organized and voiced the need for answers.

I20-17

In conclusion, this response shows

Our community is not currently nor projected as a center of congregational matriculation – that, or the driving habits of congregants differs from all of Del Cerro.

The Project will mainly serve other communities (basketball is always brought up, but can we finally get past this? Are we really going to balance a decision over whether the scales tip in favor of a cavernous basketball arena in Del Cerro?)

The Project and this Report represents massive departures from community plan realization and is forcing change in a long-established community where this level of change is not needed or being requested by the existing community and neighborhoods.

I20-16

Comments are noted; they do not address the adequacy or content of the DEIR. Instead, they express opinions that are addressed in Master Response 6 on general opposition and the need for the project.

I20-17

General opposition to the project is addressed in the Master Response 6 on that issue.

Comments

Responses

I20-18

5.5.4 Impact 2: Neighborhood Character

Issue 2: Would the project result in the creation of a negative aesthetic site or project?

Issue 3: Would the project result in a project bulk, scale, materials, or style which would be incompatible with surrounding development?

Del Cerro and surrounding areas residential character is long-established and it IS distinctive. It is indeed this distinctive character that led us to this community. The existing institutional sites were designed-in and grew up for the most part integral to the community and providing services for it. Typical infrastructure; typical services.

This institutional Project would be opportunistically shoehorned in to a residential-zoned parcel by a designation, but in a now-long-established community without forethought.

The Project is not visually consistent neither in design nor character with the immediate community it proposes to reside in. Not even close.

This fact is crystal clear by visually overlaying the Project plan within the black outline of the parcel at full scale as elaborated in the Report onto the Report's own Fig 2.5 Site Picture of the Del Cerro community.

The Report is incorrect- this Project does not fit with the surrounding architecture, aesthetics or neighborhood character. We all see that below plain as a sunshiny day.



Figure 2-5
Site Photograph
ALL PEOPLES CHURCH



I20-18

The DEIR acknowledged that the project would be different and distinctive from the nearby single-family homes. The DEIR's less-than-significant conclusion relied on established Significance Determination Thresholds for addressing impacts to visual quality and neighborhood character and are not subjective.

Comments

Responses

I20-18 (cont.) The Project is gargantuan in relation to its surroundings and misplaced for this location. Too big, over-scale, architecturally adrift from the residential mid-century character and intent.

At 54,000+ sqft, it is nearly 14% LARGER than a football field! A single build structure plopped into residential neighborhood – 14% larger than a football field? Let that sink in.

Neighborhood Character Impact

The Report's justification basis and "*less-than-significant-impact*" relies more on the massive institutional and university design complexes clear across the 8-lane California Interstate-8. The Report classifies and contextualizes these structures as part of our neighborhoods. We live here. It is most certainly part of our contiguous neighborhoods.

This fact is worth repeating. This Project purchased land zoned as single family home residential then proposes to seek approval to ignore that intended purpose. To satisfy "less than significant impact" to neighborhood character, the Project Report assigns our residential profile to institutional complexes – far apart from our community. Incredible.

I20-19 The Report's rationalization is essentially that "views going north on College Ave are minimal viewing... it's the southbound view with most visual impact". Our personal experience living here is opposite – from visiting friends and family comments looking in.

We can assure you heading into the community, not one time did any look behind to compare the neighborhood profiles around them to SDSU or Alvarado hospital to the south.

Our community character is based of course on our people and naturally on the distinctive visual appeal of our neighborhoods looking INTO our community. We do not agree with, "... on your exit note the symmetry to large institutional buildings over yonder."

Professionals agree. As we see from a sketch of a home design from the home build approved project for this parcel, there was no mistaking it:

"...The design concept is based on the mid-1960s architecture of the surrounding homes'...".

Institutional buildings and "southbound impact view" is not and never was part of our neighborhood character.



Large windows, flat roofs
 The "largely one-story" homes prized in the "high \$600,000s" will be built on 5000-square-foot lots. The three-bedroom, three-bathroom homes will be 1800, 2000, or 2275 square feet. The design "concept is based on the mid-1960s architecture of the surrounding homes with large windows, open floor plans, flat and shallow-pitched roofs, and large windows," said Paulek.

I20-19

The neighborhood character discussion takes into account all vantage points of the project afforded by public locations within the project area, including College Avenue, Alvarado Road, I-8, and trolley line. The prior residential approval is not relevant to the current project's goals and objectives, as outlined in DEIR Chapter 3.

Comments

Responses

3.1.3.21 Letter I21: Steve Colombel

Letter I21

From: Steve <bws95@yahoo.com>
Sent: Sunday, October 9, 2022 12:47 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] All peoples church 636444

I21-1 | Hello,
As a resident of district 7, I am opposed to the development by All Peoples Church. The site provides biological, historical and cultural resources. It's proximity to the nature area by adobe falls can provide an extended nature strip for wildlife to travel. Probably also an area used by the original inhabitants of our region.
Mainly, this is a residential area and our city is in desperate need for family housing and this provides none.
Please oppose this project for our neighborhood.

Respectfully,
Steve Colombel
5806 Ridgemoor Dr. 92120

I21-1

The comment does not provide evidence as to why the site is a biological, cultural, or historical resource; however, all of these topics are addressed in DEIR Sections 5.2 and 5.3. Due to its past disturbance and location surrounded by urban development and regional infrastructure (i.e., College Avenue and I-8), the quality of on-site biological habitat is poor and isolated from regional open space systems, including the Adobe Falls area. No cultural resources were identified on site as part of the cultural resources investigation contained in DEIR Appendix D; nevertheless, construction monitoring is recommended in Mitigation Measure CUL-1. The need for residential housing is not a topic for discussion in the DEIR. Refer to Master Responses 3 and 6 on residential housing policy and general project opposition.

Comments

Responses

3.1.3.22 Letter I22: Eddie and Adriana Cuadal

Letter I22

From: cuadal@aol.com <cuadal@aol.com>
Sent: Friday, October 7, 2022 11:22 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church No. 636444

Raynard Abalos
Deputy Director
Development Services Department

RE: All Peoples Church No. 636444

I22-1 | This is to state that we are "IN FAVOR" of the project for the construction for All Peoples Church which will be located in Del Cerro. We believe that this will be a positive change to our area, creating new jobs, and also providing the community a place of worship. Although there are many signs opposing this project, we believe this will be, in fact, a "good thing" for all of us.

Sincerely

Eddie & Adriana Cuadal

I22-1

Comment noted; it does not address the adequacy of the DEIR and no further response is required. General opposition to the project is addressed in Master Response 6 on that issue.

Comments

Responses

3.1.3.23 Letter I23: Christine Dammann

Letter I23

From: Christine Dammann <christinedammann@gmail.com>
Sent: Monday, October 17, 2022 3:56 PM
To: jcolloca7@gmail.com; DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] EIR

I23-1 | This email serves as our signatures that we oppose the ALL PEOPLE's Church being built in my Del Cerro community.

Christine & Ryan Dammann
6148 Arno Drive
San Diego, CA 92120

christinedammann@gmail.com
rsdammann@me.com

Please do not allow this church to be built in our neighborhood! It will have huge negative impacts on our lives.

Thank you,

Christine & Ryan Dammann

I23-1

This comment does not address the content or adequacy of the DEIR. Refer to Master Response 6 regarding general opposition to the project.

Comments

Responses

3.1.3.24 Letter I24: Konrad Davis

Letter I24

From: Konrad Davis <konrad_davis@yahoo.com>
Sent: Saturday, October 8, 2022 4:14 PM
To: DSD EASNoticing <DSDEASNoticing@san Diego.gov>
Cc: Ann Davis <davisohana@gmail.com>
Subject: [EXTERNAL] Request for Environmental Impact Report

To Whom It May Concern:

I24-1 I am writing to request a copy of a draft environmental impact report for the proposed project "All People's Church" (Project# 636444, SCH# 2021100394). My family are long term residents of the Del Cerro area in Council District 7, and have serious concerns regarding the proposed project.

Please send me any materials that you can provide.

Thank you,
Konrad Davis
CAPT(Ret), USN

I24-1

This comment does not address the adequacy of the environmental analysis. The DEIR was posted on the City's website during the public review period. No additional response is required.

Comments

Responses

3.1.3.25 Letter I25: Mardine Davis

Letter I25

From: Mardine Davis <mardinedavis@me.com>
Sent: Tuesday, October 11, 2022 4:16 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Draft EIR Comments, Project No. 636444

October 11, 2022

Comments on draft EIR to Courtney Holowach
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Sent via [email: DSDEAS@Sanidiego.gov](mailto:DSDEAS@Sanidiego.gov)

Project Name: All Peoples Church
No. 636444
SCH No. 2021100394
Community Plan: Navajo
Council District 7

To Whom It May Concern:

As a concerned member of the Del Cerro community, I have carefully read the draft Environmental Impact Report for the All People's Church project. Thank you for your serious consideration of my comments.

I25-1 | The draft EIR found that the proposed project could have significant, negative environmental impact with regard to biological resources (the disruption of environmentally-sensitive habitat) and historical resources (the possible disruption of archaeological and Native American artifacts and remains—which, it notes, are frequent in surrounding areas). The Report suggests that such impacts can be mitigated, but seldom makes clear how this mitigation might occur, and fails to provide appendices that might verify such assertions.

I25-2 | Beyond that, a number of its claims are questionable. For example, the EIR minimizes the impact of traffic, mentioning the project's proximity to transit connections. In fact, buses run infrequently along College Avenue, and the nearest trolley stops are walkable only by athletes. There are already five traffic signals in the half mile between the east-bound exit off Interstate 8 and Del Cerro Boulevard. This project proposes to add a sixth, while significantly increasing the volume of traffic along already-busy College Avenue. Additionally, the signalized intersection has not been approved by the City. This impact should not be so easily dismissed.

I25-3 | Similarly, the Report suggests that the proposed 55,000 square foot church and 71,000 square foot parking garage, with a tower rising 21 feet above grade, would not be inconsistent with the aesthetics of this residential neighborhood. In fact, while the proposed buildings might be consistent with the design of SDSU, they would be decidedly inconsistent with the single-family homes that would surround it. As the EIR notes, there would be a mere five feet between the parking and adjacent homes. Can this impact be mitigated?

I25-1

Mitigation for project impacts to biological resources and historical resources is identified in DEIR Sections 5.2 and 5.3. The mitigation measures are also contained in the Mitigation Monitoring and Reporting Plan, DEIR Chapter 9, and are made conditions of project approval. The technical appendices were posted with the DEIR on the City website during the public review period.

I25-2

The project is located in a Transit Priority Area; however, no trip reductions were taken. As such, the trip generation rate used in the DEIR is conservative, as noted in the transportation Master Response 5 regarding trip generation. It should be noted that auto delay, level of service (LOS), and other similar measures of vehicular capacity. The project's traffic congestion listed in the Local Mobility Analysis (LMA) are no longer used to assess project impacts under CEQA. Therefore, the project's LMA does *not* assess transportation impacts pursuant to CEQA. The project's transportation impacts were analyzed under CEQA in the Vehicle Miles Traveled (VMT) Assessment, as discussed in Master Response 5. The LMA addressed the project's infrastructure needs and determined that the traffic signal, pedestrian sidewalk improvements and bike lane striping are required to facilitate circulation in the project area. The traffic signal installation would become a condition of project approval.

I25-3

Refer to Master Response 4 regarding neighborhood character, which addresses the concerns expressed in this comment. The spatial proximity of the parking area to the nearby residential homes is not an environmental impact because the project conforms to the City's setback requirements.

Comments

Responses

I25-4 Each of the the project's main structures would be larger than the average-sized grocery store, resulting in nearly half the acreage being covered by non-pervious surface. Are we really to dismiss the impact this will have on sensitive habitat? On storm run-off?

I25-5 It seems to me, and to other Del Cerro residents who have read the EIR, that the Report trusts far too much on mitigations proposed by All People's Church, and on out-dated information. For example, the EIR uses as evidence a SDSU housing project around Adobe Falls (west of College Avenue and south of Del Cerro Boulevard). This project was abandoned after a lawsuit in 2007 and superseded by the university's expansion in Mission Valley.

I25-6 The truth is that the city needs additional housing, not another church in a part of the city already well-served by 20 places of worship. These six acres were previously approved for 24 houses, a proposal that would add housing with far less environmental damage, less traffic impact, and less disruption to the neighborhood. I, along with many of my neighbors, oppose any amendment of the Community Plan that would allow the All People's Church project. Add housing. It is a far better option.

Sincerely,

Mardine Davis
5840 Del Cerro Blvd.
(323) 369-8058

I25-4

The project's impact to biological resources and hydrology/drainage are thoroughly addressed in DEIR Sections 5.2 and 7.1.7.

I25-5

All mitigation identified in the DEIR will become conditions of project approval and the applicant must implement them. Refer to Master Response 2 regarding cumulative impacts.

I25-6

This comment does not address the adequacy of the DEIR. General opposition to the project is addressed in Master Response 6. Development of housing on the project site is not a project objective; refer to the Master Response 3 on the City's residential housing policy.

Comments

Responses

3.1.3.26 Letter I26: Larry Dawson

Letter I26

From: [Holowach, Courtney](#) on behalf of [DSD FAS](#)
To: [Holowach, Courtney](#)
Subject: Fw: [EXTERNAL] All People's Church /No 636444
Date: Monday, October 3, 2022 11:47:11 AM

From: Larry Dawson <larrydawson73@gmail.com>
Sent: Monday, October 3, 2022 11:12 AM
To: DSD FAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] All People's Church /No 636444

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

I26-1 | Oppose. See the multitude of problems listed in the report. Not one dime of tax money should be spent on this project. You are destroying our small community. Gridlock already exists here.

Answer this question. Why did Col Rich pull out. No one knows the answer. PS stop the six story apt atrocity too. Governments speciality at this point is breaking things. People see it.

Sent from my iPad

I26-1

This comment does not address the adequacy of the DEIR. General opposition to the project is addressed in Master Response 6.

Comments

Responses

3.1.3.27 Letter I27: Lew Dawson

Letter I27

From: Lew Dawson <lew.dawson@gmail.com>
Sent: Monday, October 17, 2022 12:15 PM
To: Evan.Youngstrom@lw.com
Cc: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Re: Response To Draft Environmental Impact Report For All Peoples Church No. 636444

To whom it may concern:

I27-1

We would like to add an additional section to our response under the Land Use heading (see below for the amended Land Use heading section). In addition to the Zoning sub-heading previously defined, we have added the Exploration Of Reduced Impact Alternatives sub-heading.

Land Use
Zoning

This approximately six-acre site is zoned under residential RS-1-7. Per city zoning regulations in Table 131-04B, Use Regulations Table for Residential Zones, use category *Assembly and Entertainment Uses, Including Places of Religious Assembly* is designated as "Use or use category is not permitted." The project requires a Planned Development Permit (PDP) entitlement to address the deviation from the current zoning ordinances. Zoning ordinances, specifically residential, are important because they:

- 1.
- 2.
3. Control the character of a neighborhood, and
- 4.
- 5.
- 6.
7. Control noise and traffic flow of a neighborhood.
- 8.

While the project has attempted to addresses these concerns, they fall in several short key areas:

- 1.
- 2.
3. Having a multistory, brightly painted structure—regardless
4. of the argument surrounding subtle architectural features and accents—does not blend in with the overwhelming majority of single-family dwellings in the neighborhood.
- 5.
- 6.
- 7.
8. Having a 900-person church in the neighborhood
9. will produce a substantial increase in both noise and traffic at multiple periods of certain days—this would not be the case with the proposed alternatives.
- 10.
- 11.
- 12.
13. The EIR fails to account for continued future

I27-2



I27-1

Refer to Master Response 4 regarding neighborhood character, which addresses these comments.

I27-2

The DEIR assesses the project that is contained in the application to the City. Conjecture on potential uses beyond what has been proposed by the applicant are speculative in nature and not reflective of the application, design and site plan submitted to the City. CEQA Guidelines Section 15145 prohibits speculation in an environmental analysis.

Comments

Responses

I27-2 (cont.)	<p>14. growth in the church's offerings. Appendix J fails to project for compounding future growth over multiple time periods. A primary goal of any church, including this church, is future growth, particularly in terms of event count and event attendee count. When</p> <p>15. activities begin taking place at the church during peak traffic times, when taking into account continued future growth, the traffic impact will be untenable for residents.</p>
I27-3	<p>16.</p> <p>Exploration Of Reduced Impact Alternatives Per section 8.3.1 of the EIR, Alternative Project Location, no suitable alternative location is proposed because:</p> <p><i>No alternative location is proposed in the EIR because this site presents special features that make it the best choice for a project of this kind. The approximately 6-acre site contains adequate room to accommodate a church/sanctuary building, parking, and access. The building site is lower in elevation than surrounding residential uses, making it less dominant when compared to level properties. All of the required infrastructure is already available to serve the site. Finally, relocating the project to an alternative location away from major roads would not allow the applicant to take advantage of freeway access and visibility and transit within the community it serves, which is one of the project objectives. As such, the current site presents characteristics that make it particularly well suited for the project and an alternative project location is not studied in detail in this EIR</i></p> <p>However, no reasonable argument has been made regarding the lack of further exploration in the following key areas:</p> <ol style="list-style-type: none"> 1. 2. 3. Environmental impact reduction 4. 5. 6. 7. Required infrastructure already available 8.
I27-4	<p>Environmental Impact Reduction While the EIR addresses mitigations and/or reductions for environmental impact, such as (Appendix C, Biological Technical Report):</p> <p><i>Mitigation for impacts to Diegan coastal sage scrub and Diegan coastal sage scrub-disturbed are proposed to be mitigated at a ratio of 1:1 where the impact occurs outside the MHPA, and the mitigation occurs inside the MHPA. Mitigation for impacts to non-native grassland are proposed to be mitigated at a ratio of 0.5:1 (for habitat not occupied by the burrowing owl) where the impact occurs outside the MHPA, and the mitigation occurs inside the MHPA.</i></p> <p>No proposed alternatives are explored, specifically, alternatives that would prevent these types of environmental impacts from initially occurring. A specific example of these environmental impacts is (Management Summary/Abstract):</p> <p><i>Development of the site would significantly impact 3.1 acres of Diegan coastal sage scrub (including -disturbed) and 0.8 acre of non-native grassland through removal. Mitigation for these impacts is proposed to be in the form of payment into the City's Habitat Acquisition Fund.</i></p>

I27-3

The project's environmental impacts would be reduced by both the Reduced Residential Development Alternative and the Reduced Project Alternative, as described in DEIR Chapter 8. With regard to infrastructure, the project site is surrounded by regional infrastructure that can be easily tapped into through minor connections to serve the project. Because of the urban nature of the project surroundings, minor utility extensions would be required to service the site and no new roads need to be constructed to access the property. Median changes to facilitate the traffic signal along College Avenue would be implemented. The DEIR is correct in concluding that an alternative location would not be feasible, as discussed further in Master Response 1 on this issue.

I27-4

DEIR Chapter 8 acknowledges that the Reduced Project Alternative would lessen the project's impact on sensitive habitats. Payment into the City's Habitat Acquisition Fund (HAF) is an allowed approach to mitigating for the loss of such habitat per the City Biology Guidelines and regulations. The HAF is a vehicle that funds purchases of land or makes improvements to the quality of habitat within the City's preserve system. Although 3.1 acres of sensitive habitat would be removed from the site, the replacement location must be of greater biological value, pursuant to the City's Biology Guidelines. Additionally, removal of the sensitive habitat from the site is anticipated in the General Plan, Community Plan and Multispecies Conservation Plan (MSCP), given the site's planned land use designation and lack of protection by MSCP policies. The impacts would not affect the long-term conservation strategies expressed in the City's MSCP. Therefore, the HAF mitigation measure is an appropriate approach to compensate for the removal of 3.1 acres of sensitive habitat from an infill site with low biological diversity and quality.

Comments

Responses

I27-4 (cont.)	<p><i>Development of the site would also impact the orange-throated whiptail, perhaps directly through injury or mortality and/or through habitat loss, but the impacts would be less than significant, and no mitigation would be required because the orange-throated whiptail is a Covered Species under the City's MSCP Subarea Plan.</i></p> <p>While it is de jure correct that environmental impact can be somewhat offset by a contribution to the City's MSCP Subarea Plan, it is de facto destruction of a current living and thriving ecosystem. There are no guarantees that the alternative location, chosen by the City's MSCP Subarea Plan, will replicate the destroyed environment and its inhabitants. Payment in exchange for destruction of these environmental resources should be more thoroughly scrutinized before proceeding.</p>
I27-5	<p>Further, it appears, through lack of proposed alternatives, that no effort was made to explore alternative pre-built sites that would meet the same (or similar) objectives with little to no net-negative environmental impact. For example, there are already-existing large buildings or warehouses with proper infrastructure for high traffic volumes, such as those in industrial parks or large business centers.</p> <p>Required Infrastructure Already Available A stated argument for lack of alternatives proposed, in the EIP (section 8.3.1, Alternative Project Location), is:</p> <p><i>All of the required infrastructure is already available to serve the site.</i></p> <p>However, this project requires infrastructure additions and modifications to College Ave., specifically median modification as well traffic flow management modifications (e.g., roundabout, traffic signal, etc.). This statement is rendered false through this argument. While this could be an honest oversight or mistake, this could also be interpreted as an intentionally misleading statement by the church or bias against objectivity by the EIP authors.</p>
I27-6	<p>On Sun, Oct 16, 2022 at 6:52 PM <Evan.Youngstrom@lw.com> wrote: To Whom It May Concern:</p> <p>After evaluating the draft environmental impact report (hereinafter EIR), we have determined there to be shortcomings that should be thoroughly and completely addressed before continued consideration of this project. We will highlight a number of fair and reasonable arguments related to the inadequacy of both the report and the project itself.</p>
I27-7	<p>Traffic This report does not address the traffic impact of the completed project in a number of areas. No defensible study or studies have been produced to provide quantitative metrics to the follow areas:</p> <ol style="list-style-type: none"> 1. Peak-Hour Traffic Impact 2. Inconsistent & Outdated Data Sampling 3. Future Projected Traffic Impact 4. Cumulative Traffic Impact 5. Unsubstantiated Statements 6. Net-Negative Traffic Impact With No Mitigation 7. Alternative Circulation Patterns <p>Per Appendix J, Local Mobility Analysis, single samples were collected for three determined peak-traffic periods (section 8.3.2):</p> <p><i>Existing counts were collected between 7:00 AM and 9:00 AM for the AM commuter period and from 4:00 PM to 6:00 PM for the PM commuter period on Tuesday, April 16, 2019, and from 10:45-</i></p>

I27-5

Per CEQA Section 15126.6, an EIR is not required to consider infeasible alternatives, such as an alternative location. DEIR Section 8.3.1 describes Alternative Project Location options and explains why they are not reasonable or feasible. Refer to Master Response 1 on alternative location and use for the site that addresses this comment. With regard to comments on infrastructure availability, see response to comment I27-3. The lack of infrastructure is only one of many factors defined in CEQA for rejecting an alternative location, the most important of which is the applicant's ability to reasonably acquire, control or otherwise have access to an alternative site. Per CEQA Section 15126.6, an EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote or speculative, such as an undefined location elsewhere in the region.

I27-6

This comment is general in character; refer to responses to the specific comments contained in this letter.

I27-7

The primary metric for addressing the project's transportation impact under CEQA is vehicle miles traveled (VMT); refer to Master Response 5 on transportation VMT provided in this FEIR. A VMT analysis was completed in accordance with the City's Transportation Study Manual and concludes that the project would not result in significant VMT impacts (see DEIR Appendix K). The topics outlined in this comment are not required as part of a VMT analysis. The Local Mobility Analysis (LMA) does *not* assess transportation impacts pursuant to CEQA but was only conducted to provide an access analysis to determine if offsite circulation improvements are required. Both studies are summarized in DEIR Chapter 3 and Section 7.1.12.

Comments

Responses

I27-7 (cont.)	11:45 AM on Sunday, April 28, 2019 to capture the time period between the two historically highest attended services.
I27-8	Subsequent sections will refer to this. Peak-Hour Traffic Impact A single sample of each peak-hour period is statistically insignificant and statistically dangerous to use for inference. One cannot deduce statistical norms and deviational errors of a population with a single sample for a given period. In addition, the collection mechanism used to gather raw traffic data has not been defined, leading to uncertainty and doubt about the accuracy and validity of the data.
I27-9	Outdated & Inconsistent Data Sampling In addition to stated statistical sampling issues, projected traffic data is outdated by a magnitude of years. Traffic projections stated in Appendix J are based upon 2019 traffic analysis data, over three years old, while church attendee numbers are from over four years ago (section 8.4.2): <i>Using current attendance and vehicle occupancy, a peak hour and daily vehicle forecast was determined for the maximum seating capacity of 900 seats as shown in Table 12.</i> No current (i.e., 2022) traffic figures nor church attendee figures are used to validate these numbers, nor is a reasonable argument provided to assert that the 2022 and beyond numbers do not deviate significantly from the numbers used in this EIR.
I27-10	Future Projected Traffic Impact In addition to being based upon outdated data sampling, as mentioned above, the future projected traffic impact data is also improperly based upon a single-point-in-time analysis. It fails to account for traffic growth from other sources in the community (e.g., the proposed six-story apartment complex along Del Cerro Boulevard), as well as failing to account for potential growth in the number of services held by the church, expansion of the church's activities to days other than Sundays, or potential future expansion/restructuring of the church building itself to accommodate more congregants at each service. The data also fails completely to consider the increased vehicular and pedestrian traffic incidents and fatalities that necessarily accompany increased traffic.
I27-11	Cumulative Traffic Impact No reports on the cumulative traffic impact of this project, particularly in conjunction with other proposed developmental projects in the vicinity (i.e., the proposed six-story apartment complex along Del Cerro Boulevard) and community/SDSU events (e.g., concerts, graduation, sporting events, etc.), have been provided. Evaluation of traffic impact must take into account not only street-level impacts but also region-level impacts.
I27-12	Unsubstantiated Traffic Statements Section 7.1.2.1 of the EIR states: <i>Under the existing land use designations in the Navajo Community Plan and RS-1-7 zone, the project site can build up to 52 single-family residences, assuming a 5,000-square-foot (SF) lot minimum over the approximately 6-acre site. The project would produce less traffic on an average weekly basis than a residential use that would be consistent with the existing zoning for the project site.</i> However, no analysis or figures are provided to back up the assertion that the church project would produce less traffic than would single-family residences. It also fails to account for the difference in traffic patterns produced by single-family homes versus a church (i.e., a church will produce large amounts of traffic at a single time while the traffic produced by single-family homes will be sparse).

I27-8

The LMA's peak hour analysis was conducted in accordance with the City's Transportation Study Manual. The peak hour data used in the LMA are both appropriate and accurate for assessing access needs in the project area, as described in the transportation tropical response regarding the LMA.

I27-9

Refer to Master Responses 2 and 5 regarding the cumulative analysis and transportation topical on the LMA.

I27-10

Refer to Master Response 2 regarding cumulative impacts and Master Response 5 which provides more detail regarding how the VMT analysis is consistent with the Office of Planning and Research guidance for assessing transportation impacts under CEQA. The VMT addresses trips from the full capacity of the 900-seat church, which accounts for the project's growth over time. Impacts were presumed in the DEIR to be less than significant.

I27-11

Refer to Master Responses 2 and 5 on VMT analysis and cumulative impacts. The LMA is not used for assessing impacts under CEQA, instead a VMT screening was conducted, as detailed in the transportation Master Response 5 on VMT and LMA.

I27-12

The analysis of alternatives does not need to be at the same level of detail as the project per CEQA Section 15126.6. The City's Transportation Study Manual requires a VMT screening and/or analysis be conducted for assessing transportation impacts under CEQA. The screening criteria use average daily trips to determine the potential for impacts; refer to Master Response 5 on VMT for additional discussion. Traffic patterns or level of service are not the criteria used for a VMT screening or CEQA impact analysis.

Comments

Responses

I27-13	<p>In addition, no quantitative analysis is provided to give defensible merit to their subsequent claim of air-quality impact (Section 7.1.2.1):</p>
I27-14	<p><i>Less than significant impacts would result</i> Net-Negative Traffic Impact With No Mitigation Using rudimentary logic, it can be deduced that adding an additional traffic signal to a currently uninterrupted road segment will have net-negative impact. Thus, the addition of a traffic light between two established intersections, the Del Cerro Blvd and College Avenue intersection and the 8 West exit intersection, will force a subset of vehicles to stop for a duration of time. It can be concluded, based upon this same rudimentary logic, that this will cause additional friction for this subset of vehicles desiring to enter the 8 West freeway onramp.</p> <p>Further, as can be seen along College Avenue near the 8 East freeway offramps and onramps, when there are too many traffic signals within a short stretch of road, it results in stunted traffic flows, especially when the signals get out of sync. Adding another signal to the north side of College Avenue would result in equivalent stunted traffic flows, compounding the issue.</p>
I27-15	<p>Alternative Circulation Patterns The EIR and Appendix J provides an incomplete proposal and analysis of potential traffic circulation patterns. For example, no analysis was provided (nor proposed) with regard to a roundabout or traffic circle. Alternative exploration is requested to understand if there are less impactful solutions available.</p>
I27-16	<p>Land Use Zoning This approximately six-acre site is zoned under residential RS-1-7. Per city zoning regulations in Table 131-04B, Use Regulations Table for Residential Zones, use category <i>Assembly and Entertainment Uses, including Places of Religious Assembly</i> is designated as "Use or use category is not permitted." The project requires a Planned Development Permit (PDP) entitlement to address the deviation from the current zoning ordinances. Zoning ordinances, specifically residential, are important because they:</p> <ol style="list-style-type: none"> 1. Control the character of a neighborhood, and 2. Control noise and traffic flow of a neighborhood. <p>While the project has attempted to address these concerns, they fall in several short key areas:</p> <ol style="list-style-type: none"> 1. Having a multistory, brightly painted structure—regardless of the argument surrounding subtle architectural features and accents—does not blend in with the overwhelming majority of single-family dwellings in the neighborhood. 2. Having a 900-person church in the neighborhood will produce a substantial increase in both noise and traffic at multiple periods of certain days—this would not be the case with the proposed alternatives. 3. The EIR fails to account for continued future growth in the church's offerings. Appendix J fails to project for compounding future growth over multiple time periods. A primary goal of any church, including this church, is future growth, particularly in terms of event count and event attendee count. When activities begin taking place at the church during peak traffic times, when taking into account continued future growth, the traffic impact will be untenable for residents.
I27-17	<p>Proposed Alternatives The Del Cerro community is in favor of this parcel of land being used to benefit the community of Del Cerro and the city of San Diego. Below are ideas from the community for more appropriate ways to use the space, including:</p> <ol style="list-style-type: none"> 1. Low-Density Housing

I27-13

DEIR Section 7.1.2.1 qualitatively discusses the project's consistency with the land use (and therefore emissions projections) in the regional air quality management strategy. However, a quantitative analysis is provided in DEIR Section 7.1.2.2 and DEIR Appendix G, which shows that the project would not exceed the City's thresholds for criteria pollutants during project construction and operations. As such, less-than-significant air quality impacts are identified in the DEIR.

I27-14

The CEQA impact determination is based on the project's VMT not whether new delays would be caused along College Avenue because delay is not a metric used for assessing impacts under CEQA. Refer to the transportation Master Response 5 on Local Mobility Analysis (LMA), VMT and the College Avenue operational changes for additional discussion on this topic.

I27-15

The LMA recommended a traffic signal as a circulation improvement at the project entrance. The City did not request that a round-about or traffic circle be studied.

I27-16

These comments are repeated from earlier in this letter; see responses I27-1 and I27-2 above.

I27-17

An EIR shall describe a range of reasonable alternatives to the project which would feasibility attain most of the basic objectives of the project, in accordance with CEQA Guidelines Section 15126.6. The alternative land uses and projects listed in this comment do not meet any of the project objectives, and therefore, are not considered reasonable or feasible. Refer to Master Response 1 regarding alternative locations or uses.

Comments

Responses

127-17
(cont.)

- 2. No Project, City-Owned Land
- 3. Community Park
- 4. Tiny Home Village for the Homeless

Low-Density Housing

When the land was purchased by the developer who sold it to the church, the plan was to use the land to build single-family residences. This type of development of the property would be entirely appropriate, as the parcel is specifically zoned already for single-family homes and the need for housing in San Diego continues to increase.

No Project, City-Owned Land

The community has appreciated for years the natural beauty of the land, as has everyone who drives past the College Avenue intersection with the 8 freeway. Many in the community favor leaving the land with its natural landscape, to help the environment.

Community Park

A park with paths for walking and bike/scooter riding, a playground area, and potentially a recreation center would benefit the community tremendously, particularly with the increase in families expected in the immediate area with the development of the proposed apartment building along Del Cerro Boulevard.

Tiny Home Village for the Homeless

This parcel of land could also serve as San Diego's first test of a program that has been highly successful in combating homelessness in other cities in the nation: a tiny home village for the homeless (such as the one recently approved in Chula Vista).

Thank you for your consideration.

Evan Youngstrom (6209 Del Cerro Blvd.)
Lewis & Sarah Dawson (6251 Capri Dr.)
Judith Abegglen (6225 Del Cerro Blvd.)
Susan & Hailey Andrews (6228 Capri Dr.)
Lisa Busalacchi (6235 Capri Dr.)
Gonçalo and Nancy Gloria (6240 Capri Dr.)

Best,

Evan R. Youngstrom

LATHAM & WATKINS LLP

Cell: +1.858.209.4449

Email: evan.youngstrom@lw.com

<https://www.lw.com>

Comments

Responses

3.1.3.28 Letter I28: Lauren Degheri

Letter I28

From: L&D Degheri <degherihousehold@gmail.com>
Sent: Friday, October 14, 2022 1:31 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] All People's Church - Opposition

Hello!

I28-1 | My name is Lauren Degheri and I am a San Diego resident in district 7. I wanted to write to you and the rest of the council members in San Diego to discuss the proposed All People's Church that is proposed for Del Cerro. The project number is 636444 for reference.

I wanted to state my opposition to the project and say it is not a good fit for the Del Cerro community or for the city of San Diego. The project is sitting on land that is currently zoned for low density housing (RS 1-7) and San Diego is in the middle of a housing crisis. We need more housing, not another church that will not be paying taxes and taking up centrally located land in San Diego.

Please review the environmental impact report and encourage your other council members to vote against this project.

If there is anything I can do to help, please let me know. I'm not sure how all of this works but I do know in talking to my neighbors while out on walk, no one I've talked to is supportive. Please listen to the people who are currently in the neighborhood.

Thank you for your time and consideration.
Best Regards,
Lauren Degheri
619.708.9117

I28-1

This comment does not address the adequacy of the DEIR. As a non-CEQA topic, general opposition to the project is addressed in Master Response 6. Development of housing on the project site is not a project objective; refer to Master Responses 1 and 3 regarding the residential alternative contained in the DEIR and the project's consistency with residential housing policy.

Comments

Responses

3.1.3.29 Letter I29: Kendra DeGroot

Letter I29

From: Kendra DeGroot <1coastalsprout@gmail.com>
Sent: Monday, October 17, 2022 4:40 PM
To: DSD EAS <DSDDEAS@sanidiego.gov>
Subject: [EXTERNAL] All peoples church Del Cerro

I29-1

To whom this may concern,
I am writing this email in regards to the project name all Peoples Church project number 636444. I would like to express my concerns about this project and where it will be located. I live in the community of delcerro and I have used the college exit headed westbound and I have seen many collisions happen at this exit as it is now. I am concerned about the size of all peoples church being 900 seats and how it would impact the safety of that corner and everyone who lives around that area. I how large this church would be, Headed westbound and I have seen many collisions happen at this exit as it is now. I am concerned about the size of all peoples church being 900 seats and how it would impact the safety of that corner and everyone who lives around that area. I am also concerned about how large this church would be, how it would host parking for its congregation, and most of all the safety as I mentioned before.
Thank you for your time,
Kendra DeGroot
I can be reached at 805-345-6324

I29-1

The DEIR Appendix J, *Local Mobility Analysis* (LMA), conducted on the project evaluated where improvements are required for site access and determined whether there are any deficiencies in the local circulation network that surrounds the project site which would trigger the need for circulation improvements. City staff identified the intersection of College Avenue and Del Cerro Boulevard for a systematic safety review. The LMA conducted a review of the accident history for the latest available five years (2015–2019) at the intersection of College Avenue and Del Cerro Boulevard and concluded that no specific pattern of pedestrian-vehicle accidents was found for the study period. Therefore, no safety changes are needed at that location.

Comments

Responses

3.1.3.30 Letter I30: Maria DeLeon

Letter I30

From: Maria DeLeon <mariadeleon1@cox.net>
Sent: Tuesday, October 11, 2022 2:37 PM
To: DSD EAS <DSD EAS@sandiego.gov>
Subject: [EXTERNAL] All People's Church/No. 636444

To: the city of San Diego

RE: All People's Church / No. 636444

I30-1 I am a resident of the Del Cerro community and I am extremely concern with this proposed development. The potential traffic and pedestrian congestion that this will bring to the main intersection of College Avenue and Del Cerro Blvd is extreme. Getting in/out of the community to access the freeway will add more stress, traffic time and congestion to an already busy road. There are other consequences too like more air polution, noise polution, wear and tear of the roads. There is already a lot of potholes on College Avenue before you get to the bridge that are not taken care of by the city. One stands to reason that an increased number of cars will also deteriorate the road conditions.

I30-2 Furthermore, Del Cerro is a community established over 60 years ago and the community's infrastructure is already in place. What will be the cost of reengineering and constructing of the North and Southbound lanes of college Avenue? Are we the taxpayers of Del Cerro expected to pay for this?

Thank you for your attention.

Concern resident,

Maria DeLeon

mariadeleon1@cox.net

I30-1

The DEIR studied all of the potential impacts mentioned in this comment and concluded that the project would not result in significant traffic, air quality or long-term noise impacts. The project would add between 280 weekday trips and 1,976 trips on Sundays when the church is at full capacity. When compared to the approximately 24,000 Sunday trips to 29,000 to 37,000 weekday vehicles trips shown in Figure 9 of the project's Local Mobility Analysis (LMA; DEIR Appendix J) that currently use College Avenue, the project's trips would not be substantial; thus, the project's VMT impacts are presumed to be less than significant. In addition, wear and tear on roads is not an environmental impact or required content in an EIR.

I30-2

There is no need to reengineer or reconstruct the northbound and southbound lanes of College Avenue as a result of the project, as demonstrated in the LMA. No further response is required.

Comments

Responses

3.1.3.31 Letter I31: Nadine Desteunder

Letter I31

From: Nadine <ndesteunder@cox.net>
Sent: Sunday, October 9, 2022 5:39 PM
To: DSD EAS <DSDDEAS@sanidiego.gov>
Subject: [EXTERNAL] EIR for All Peoples Church

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

RE: All Peoples Church
Project No. 636444
SCH No. 2021100394

I have several concerns.

- I31-1 This seems very unfair for the residential homeowners. Their property values will be affected and the high rise parking structure will be an eyesore. This does not fit in with CPA for the Navajo Community Plan.
- I31-2 But, my biggest concern is the impact on the traffic flow into the Del Cerro area. We already have an overflow of traffic in the AM and PM with people traveling to Patrick Henry High School. There could very well be a back up on I-8 getting onto College Ave. The large capacity facility will also affect the noise level to a quiet resident area.
- I31-3 Please reconsider what this will do to an older, established neighborhood, with limited inlets and outlets. This is not what San Diego was meant to be.

I31-1

These comments do not address the adequacy of the DEIR. Additionally, property values are not a CEQA issue. Visual simulations of the project (DEIR Figure 5.5-4a and 5.5-4b) show that the two-story parking structure would be constructed entirely below the grade of College Avenue and not as a high-rise parking structure as suggested in this comment. Refer to revised Table 5.1-2 for consistency with the Navajo Community Plan.

I31-2

Project impacts to transportation and long-term noise exposure would be less than significant as outlined in DEIR Sections 5.4 and 7.1.12.

I31-3

General opposition to the project is not a CEQA issue and is addressed in Master Response 6 for general opposition.

Comments

Responses

3.1.3.32 Letter I32: Scott Dickson

Letter I32

From: Scott Dickson <sdickson@ldgcre.com>
Sent: Sunday, October 16, 2022 10:19 PM
To: DSD EASNoticing <DSDEASNoticing@sanidiego.gov>; DSD EAS <DSDEAS@sanidiego.gov>
Cc: CouncilMember Raul Campillo <RaulCampillo@sanidiego.gov>
Subject: [EXTERNAL] Project Name: All Peoples Church Project No. 636444 SCH No. 20211003

Project Name: All Peoples Church
Project No. 636444
SCH No. 2021100394
Community Plan Area: Navajo
Council District: 7

Hello,

I32-1 I hope you are well! I'm am a resident of Del Cerro and am writing to **contest** the proposed project to convert a designated residential property to a non-residential property, namely the All Peoples Church. The site is currently designated for residential use and has already been approved for 24 single-family dwelling units.

The housing shortage in San Diego has become one of the City's biggest difficulties. The City has failed to build residential properties to accommodate its rate of economic and population growth. The City's housing inventory map indicates there is capacity to build on thousands of possible sites, including the property proposed for the All Peoples Church in the Del Cerro Community. In order to meet the City's 2021-2029 goal of building 108,000 units, the City will need every parcel and unit, including the 24 single-dwelling units already approved for this property. If the City approves conversion of the residential property to non-residential property, the City will lose a valuable opportunity to try and meet the 2021-2029 goal.

Thank you for your time and consideration.

Scott Dickson

I32-1

Building housing is not one of the project objectives, which are stated in DEIR Chapter 3. The 24-unit residential subdivision that was previously approved on site is described in the Reduced Residential Alternative and it would have similar significant impacts as the church/sanctuary project as discussed in DEIR Chapter 8. Commentary on the need for the project, as well as the City's residential housing policy, is addressed in Master Responses 3 and 6.

Comments

Responses

3.1.3.33 Letter I33: June Dodge

Letter I33

From: June D <junedodge@gmail.com>
Sent: Sunday, October 16, 2022 11:17 PM
To: Holowach, Courtney <CHolowach@sanidiego.gov>
Subject: [EXTERNAL] Concern about the Proposed All People's Church Complex in Del Cerro

Hello City of San Diego Representative, Courtney Holowach;

I'm writing to express my great concern about the proposed Del Cerro All People's Church.

My first concern is the traffic changes that would occur.

133-1 | The reports estimate there will be three Sunday services with varied numbered of cars for each: 85, 94, 61, 61 73 cars entering and leaving the proposed church lot – with only 30 minutes for people to leave the service, visit with friends, enter their cars and make their way to the exit while the next set of cars enter the parking area. There is one major entry/exit and a small one to the proposed complex. Clearly this transition would need more time for people to do, even if they walked quickly and directly from the church to their car. This extra traffic would greatly add to the load of traffic that is already in the area.

Additionally, they are building the church with seating for 900 attendees – so the cars would need to have at least three people per car. The current charts clearly show that most of the attendees are in cars that have between 1 and 2 occupants. Having a new church will do nothing to correct the driving habits of the attendees.

133-2 | Since the numbers in the various reports are all based on current attendance (85, 202, 130, 152, 184 attendees per service), why do they need to over-build to have seating for 900 people? I believe they will change their focus to grow the congregation to fill the church so the parking and traffic numbers would soon be woefully inadequate. The attendees would start to take over other parking areas and so in addition to causing a traffic jam, would be taking away from the parking that is now needed by residents.

133-3 | Why is this church being built in a place that is so far away from its congregation? It is unreasonable for the current residents to have to put up with additional traffic and to have to potentially pay for improvements that would be passed on to them without direct benefits being earned. Surely there are churches nearer to Pt Loma that those students could attend, rather than gassing up a bus each week to carry a load (or loads) of students on the freeway each week.

And rather than having the rest of the congregation have to fill their various cars to go to church, a more reasonable solution would be to find a place nearer to the congregation.

133-4 | Although the SDSU trolley station is under a mile from the proposed church, there is a height that must be climbed to get to the proposed church, so this path over the freeway is not an easy one. Listing it as a way for the congregation to get to church is

I33-1

Comment contains data from the Local Mobility Analysis (LMA) but does not address the adequacy of the DEIR. No additional response is, therefore, required.

I33-2

The Vehicle Miles Traveled (VMT) Assessment screening assumes increases in both staffing levels and congregation that are projected to occur over time when the church relocates to the project site. The 900-seat capacity is based on the church's application to the City. The DEIR analyzed that projected capacity and determined there would not be significant transportation impacts caused by the project. The project design includes more parking supply than is required by City land development codes. Parking is not a CEQA topic, and it is speculative to suggest that the parking needs of the church would not be met on site.

I33-3

The church currently rents space 2.5 miles away from the project site. Transportation impacts were determined to be less than significant in the DEIR Section 7.1.12 and DEIR Appendix K.

I33-4

The DEIR notes that there are two trolley stations within a mile of the project site, however, the VMT analysis conservatively did not assume that the staff or congregation would take transit to get to the site when developing the trip generation. Refer to the transportation Master Response 5 on trip generation for additional information. Any transit usage by church users would reduce the number of trips to/from the project site.

Comments

Responses

- ↑
- I33-4 (cont.) | exaggerated. As the church does not guarantee or mention that they anticipate any of their people will be taking the bus or riding a bike, discussion of those routes is superfluous.
- I33-5 | The reports on the proposed church mainly discuss the Sunday use of the buildings, but what is to prevent this organization from later opening more weekday programs (counseling programs, bible studies, recruitment of new members, basketball games, day school, or childcare), or hiring more staff?
- I33-6 | I am also concerned to hear that drug counseling is going to be offered by this church in this residential area so close to existing schools. These kinds of services should be offered in non-residential areas.
- I33-7 | The property is in a residential area and is currently approved for a 24-unit housing project. Even if each of those houses had four cars with appropriately planned parking and entrances/exits, the number of cars would be fewer than the number estimated for this mega-church project, and would not affect the residents living so near (and not so near) the proposed church buildings. The congregation will be driving in and out of the area – mostly on Sundays, but also on other days. They will need to follow the lead of other churches who have increased membership to help pay for the buildings and maintenance, so all these reports based on current attendance are questionable. Having this church at this location would cause stresses to the community not mentioned in the reports.
- I33-8 | I encourage you to do all in your power to stop this project from proceeding in our residential area.
- Thank you,
 June Dodge
 5856 Eldergardens St
 San Diego CA 92120

I33-5

The DEIR assesses the project description that is contained in the application to the City, including the weekday programs and gym usage. Conjecture on potential uses beyond what has been proposed by the applicant are speculative in nature and not reflective of the application, design and site plan submitted to the City. CEQA Guidelines Section 15145 prohibits speculation in an environmental analysis.

I33-6

See response to comment I33-5 regarding speculation on the applicant’s operations, as well as Master Response 6 regarding the project’s programming.

I33-7

The 24-unit residential housing development previously approved on site was projected to produce 260 daily weekday trips, as compared to the 280 daily weekday trips associated with the church, based on the prior project’s technical study referenced in the Mitigated Negative Declaration adopted by the City. The 280 trips calculated for the project assume the church is operating at its 900-seat capacity; therefore, the DEIR does take into account congregation and staff growth that would occur in the proposed location. The claims made in this comment are speculative and not supported by the evidence. CEQA Guidelines Section 15145 prohibits speculation in an environmental analysis.

I33-8

General opposition to the project is addressed in Master Response 6 on that non-CEQA issue.

Comments

Responses

3.1.3.34 Letter I34: Bruce Doole

Letter I34

From: [Bruce Doole](#)
To: [DSJ_EAS](#)
Subject: [EXTERNAL] All people's church 636444
Date: Tuesday, October 4, 2022 12:24:28 PM

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I34-1 [There's no way this community of Del Cerro can sustain the traffic and additional noise created by this massive facility in this neighborhood.

I34-1

The claims made in this comment are speculative and not supported by the evidence, which concludes that that project would not result in significant transportation and operational noise impacts. CEQA Guidelines Section 15145 prohibits speculation in an environmental analysis. The comment does not speak to the adequacy of the environmental analysis of the DEIR.

Comments

Responses

3.1.3.35 Letter I35: Martin Doucett

Letter I35

From: SDGov Webmaster <SDGovWeb@sandiego.gov>
Sent: Saturday, October 8, 2022 9:37 AM
To: DSD-ExpediteProgram <DSD-ExpediteProgram@sandiego.gov>
Subject: Form submission from: Email Development Services

Submitted on Saturday, October 8, 2022 - 09:37

SENDER:
doucettphd@gmail.com [1]

SUBJECT:
All Peoples Church 636444

MESSAGE:

- I35-1 | Please do not approve the construction of the All Peoples Church (APC) in Del Cerro. The majority of the community does not want the church. (Drive around the neighborhood and see the number of signs that oppose this development.). We have a synagogue across the street from the proposed site and a large catholic church about a 1/2 mile away. We are good on places of worship.
- I35-2 | The college off ramp is the only way in and out of the community. Traffic is already bad in the morning and afternoons. Common sense tells us that adding a traffic light on College Avenue will create even more congestion at the College and Del Cerro Blvd intersection as well as back up traffic coming north from SDSU. And the worst of it will be during construction with heavy equipment in and out of the area on weekdays and during business hours.
- I35-3 | Many in the community would like to see this area kept as green space or park area. A large church, parking structure and a visible cross is unwelcome and does not represent the community.
- I35-4 | Churches do not pay taxes. While APC provides a place of worship they say on their website that their congregation is from outside our community. So what do they contribute to Del Cerro? Traffic, congestion, and noise. They state that they plan to keep a small footprint and limit services but they are zoned for more that just religious services and already do provide programming that will only expand and grow over time, increasing the negative impact in Del Cerro.
- I35-5 | And last, I understand that they have been approached and asked to build and invest where they are currently renting space in an effort to improve the area. Why dont they build where they are wanted instead of a community where they are not wanted?

Martin Doucett, Ph.D.
15 year resident of Del Cerro

I35-1

The comment does not address the adequacy of the DEIR. General opposition to the project is noted and is addressed in Master Response 6 on that non-CEQA topic, along with the need for the project.

I35-2

The LMA reviewed and approved by City staff demonstrates that adding the traffic signal to College Avenue would be a required access improvement that would not adversely affect the nearby intersections (refer to DEIR Appendix J). Refer to transportation Master Response 5 regarding the College Avenue operational changes. Construction traffic would be temporary and would not contribute to long-term traffic conditions in the community.

I35-3

Comments on alternative uses for the site, including open space, are addressed in Master Response 1on that issue.

I35-4

The comment does not address the adequacy of the DEIR and the claims are not supported by evidence.

I35-5

The comment does not address the adequacy of the DEIR.

Comments

Responses

3.1.3.36 Letter I36: David Einstein

Letter I36

From: David Einstein <david.m.einstein@gmail.com>
Sent: Saturday, October 8, 2022 2:31 PM
To: DSD EAS <DSDDEAS@sandiego.gov>
Subject: [EXTERNAL] Environmental impact report for Del Cerro church

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To whom it may concern,

I36-1 Thank you for soliciting community comments. Constructing this church would be an unmitigated disaster for the nearly entirely residential community of Del Cerro. This has become particularly more acute now that a six story apartment building has been announced just around the corner from the proposed church.

The resulting traffic from either of these projects would be highly deleterious, but the two together would be completely unacceptable. Please note that there is an elementary school on the same street as the apartment building and around the corner from the proposed church. There is already very heavy traffic for parents taking and picking up their children at the school. Any further traffic would be highly problematic for those parents and unsafe for the children. Neither of these proposed projects will likely have enough parking to accommodate them, either, which will be a major problem for homeowners in the area.

I36-2 The infrastructure of this area will be negatively impacted by these projects. If the church is tax exempt, they will contribute nothing to this community or the city of San Diego.

This will likely also be a negative factor when considering home prices in the area. I cannot speak to some of the other issues that the impact report has addressed.

I36-3 I imagine nearly the entire community of Del Cerro is against this project, and I strongly urge the city to not permit it to move forward. Surely a church of the size can find another less residential area to build, one with better traffic conditions and newer infrastructure.

Thank you.

David Einstein, MD
Sent from my iPad

I36-1

The transportation analysis conducted for the DEIR shows that the project would not result in significant vehicle miles traveled (VMT) impact. Refer to the transportation Master Response 5 on VMT and Local Mobility Analysis (LMA) which address the transportation information in the DEIR. The claims made in this comment are speculative and not supported by the evidence. CEQA Guidelines Section 15145 prohibits speculation in an environmental analysis.

I36-2

The financial issues raised in this comment are not environmental impacts. The comment does not address the adequacy of the DEIR and the claims are not supported by evidence in the record. As demonstrated in DEIR Section 7.1.13, no infrastructure impacts would arise as a result of the project.

I36-3

The comment does not address the adequacy of the DEIR. General opposition to the project is noted and is addressed in Master Response 6 on that topic. Comments on an alternative location for the project are addressed in Master Response 1.

Comments

Responses

3.1.3.37 Letter I37: David Endow

Letter I37

From: david endow <davidendow@hotmail.com>
Sent: Monday, October 17, 2022 4:57 PM
To: DSD EAS <DSD EAS@sandiego.gov>
Subject: [EXTERNAL] All Peoples Church: Project No. 636444

Dear Courtney Holowach:

I37-1 I'm sending this email to strongly object to the All Peoples Church project currently proposed for the Navajo community plan area within Council District 7. This proposal is extremely short-sighted and attempts to fill a need that nobody in the community is asking for. This proposal is vague and leaves way too much open for interpretation, which leads me to believe this is purposeful so All People's can do whatever they want after approval.

For example, the project notes that small group activities may occur on Wednesdays, Saturdays, and other days of the week. They do not limit the occupancy of said events and have left the impact on residents very open-ended as a direct result. Moreover, they note that there is no current plan for primary educational school spaces proposed but they fully understand that outreach programs, Sunday and Saturday school programs, etc are not primary education programs but still leave a lasting impression on local residents.

We do not have the freeway access, nor the street access, to properly house this project. Their website alone (<https://allpeopleschurch.org/about/staff/>) mentions programs for babies through fifth grade, freedom ministries, community events, churchwide groups and youth programs. That alone tells you that they plan to be in full swing well beyond Sundays. As such, we need a better plan in place to house 900 people an additional six days a week or this proposal must be denied accordingly. Del Cerro Blvd and Madra alone are integral pathways for all Del Cerro and Allied Gardens residents. As currently presented this Church does nothing but clog the initial artery in and out of our beloved neighborhood.

Thank you so much for your time and please help us direct this project to an area far more appropriate moving forward. The overwhelming consensus of the community is against this plan. We welcome you to drive through some time and see the No Mega Project signs that are EVERYWHERE in the neighborhood!

Sincerely,

David Endow

I37-1

The comment does not address the adequacy of the DEIR. CEQA Guidelines Section 15145 prohibits speculation in an environmental analysis. General opposition to the project is noted and is addressed in Master Response 6 on that non-CEQA topic.

Comments

Responses

3.1.3.38 Letter I38: Gene Erquiaga

Letter I38

From: Gene Erquiaga <ntmggen@gmail.com>
Sent: Saturday, October 15, 2022 4:27 PM
To: Holowach, Courtney <CHolowach@sandiego.gov>
Subject: [EXTERNAL] All Peoples Church Mega Project

October 15, 2022

Project Name: All Peoples Church
Project No. 636444
SCH No. 2021100394
Community Plan Area: Navajo
Council District: 7

RE: Opposition to All Peoples Church Mega Project

Dear Courtney Holowach,
I'm writing to you regarding my strong opposition to the All Peoples Church Mega Project. I've been a Del Cerro resident and home owner since 2001. I'm opposing the construction of the All Peoples Church as I have the following concerns regarding this mega project moving forward.
1) San Diego is experiencing a severe housing crisis. This land has already been approved for 24 housing units – which are desperately needed. This is a viable alternative project that makes more sense to the community and to the city. **By approving this project, you are basically voting NO on housing.**
2) Without a general plan amendment - This project would be in violation of San Diego's Municipal Code. According to the San Diego Municipal Code, Table 131-04B, Use regulations for Residential Zones, specifically disallows Religious Assembly in RS 1-7 Zoning.
3) The project applicant has admitted they expect 95% of the people attending their site to come from out of the area, and then leave the area. This will greatly impact greenhouse gas emissions – in essence doubling these emissions. This runs counter to the City's Action Plan of reducing greenhouse gas emissions.
I urge you to please vote NO on this project. Our community, our city, our plant thanks you!

Gene Erquiaga
5839 Overlake Avenue
San Diego, CA 92120

I38-1

I38-1

The comment does not address the adequacy of the DEIR; refer to Master Responses 1 and 6 regarding general opposition to the project, alternative location or use of the site, and need for the project.

The housing crisis is not an environmental impact nor it is an environmental setting for the project, as discussed in Master Response 3 under residential housing policy. Refer to Master Response 3 on the project's consistency with the applicable policies from the General Plan, Community Plan and zoning regulations, which addresses the specific policy concerns expressed in this comment. The DEIR Section 5.1.2.4 discloses that a non-residential use would be constructed on site instead of housing; however, the analysis demonstrates that the church would comply with the applicable Residential Element policies in the Navajo Community Plan related to design.

Construction of the project would not double the amount of greenhouse gas emissions in the local area or region. As demonstrated through calculations and policy analysis contained in DEIR Section 7.1.5, the project would generate less greenhouse gas emissions than the 52 residences that are allowed by the City's Land Development Code (LDC) on the project site (as shown in DEIR Tables 7-7 and 7-8). In addition, it would not result in significant greenhouse gas emissions and would be consistent with the City's Climate Action Plan (CAP) by complying with the various greenhouse gas emissions reduction strategies outlined in the project's CAP Consistency Checklist (refer to DEIR Appendix B). Furthermore, a Vehicle Miles Traveled (VMT) Assessment screening analysis was conducted (refer to DEIR Appendix K) which shows that the project would not result in significant VMT impacts. Therefore, the project is consistent with the City's CAP and related policies.

General opposition to the project is noted and is addressed in Master Response 6 on that topic.

Comments

Responses

3.1.3.39 Letter I39: Ryan Evenson

Letter I39

From: Ryan Evenson <ryanevenson@gmail.com>
Sent: Wednesday, October 5, 2022 12:06 PM
To: DSD EAS <DSD EAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church/No. 636444

Dear sir or madam,

I39-1 I am writing to voice my concerns related to the subject project and EAR. It is my opinion, as a homeowner in the subject's project area, that the proposed structure and use would detract from the community. Please do not proceed with the proposed Community Plan Amendment.

Thank you,

Ryan Evenson

5774 Malvern Ct, San Diego, CA 92120

I39-1

The comment does not address the adequacy of the DEIR. General opposition to the project is noted and is addressed in Master Response 6 on that topic.

Comments

Responses

3.1.3.40 Letter I40: James Forbes

Letter I40

From: James Forbes
To: DSU/EAS
Subject: (EXTERNAL) Impact of All Peoples Church
Date: Thursday, October 6, 2022 9:38:39 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

This is in reference to
Project Name: All Peoples Church
Project No. 636444

I40-1 The destruction of any nice open space with such high visibility should always be warily considered, as far as aesthetic and natural impact, but this one is being taken for the construction of a massive complex so out of character for its surroundings as to immediately cause panic among those of us who love our neighborhood. This area is zoned residential for a reason. And there is no good reason to circumvent the planning..

I40-2 Furthermore, how many members of this church are actual members of this community in which their church is being placed? I would venture it's close to zero. If it is a matter of convenience for the congregation due to our freeway access.. there are many areas that have good freeway access which are suffering from urban blight., and a complex of this nature could be seen as a source of community pride and revitalization, rather than angst and destruction. More importantly, it likely wouldn't have to circumvent the zoning standards of the community it was trying to join.

I40-3 Lastly, and this might be getting too far into the weeds.... the traffic choke for our only access points in and out of our neighborhood will not only be a source of misery, but also a source of danger. The only way back to the freeway for this massive congregation would be a) by performing an illegal U-turn at Del Cerro Blvd, B) by turning left on Del Cerro Blvd and doing a U-turn at the intersection with Capri, which already struggles to accommodate the few cars that do this to get turned around on College Ave a C) turning right on Del Cerro Blvd and performing an illegal U-turn at the driveway of the bagel shop, D) pulling through the Chevron and turning left back on to Del Cerro Blvd, or E) bypassing Del Cerro Blvd to turn left on Lambda or Rockhurst, which would funnel hundreds of cars through the residential area where children currently play on Sundays. Any of these options would be very impactful to the quiet area and safety of our streets if this was as small a group as a little league team leaving practice from that facility, let alone a mega church suddenly seeing 900+ people leaving at the same moment. .

Please don't "green light" this disaster.

James Forbes
Del Cerro.

I40-1

Building housing is not one of the project objectives and a church is an allowable use within the residential zone. The project would not result in significant impacts related to visual effects and neighborhood character, as demonstrated in the DEIR Section 5.5 analysis and further outlined in Master Response 4 on neighborhood character.

I40-2

This comment does not address the adequacy of the DEIR. A rezone is not required to implement the project; it requires approval of a Community Plan Amendment, Planned Development Permit and Site Development Permit. Pursuant to San Diego Municipal Code Section 126.0602 (a) (2) a Planned Development Permit (PDP) allows for a use that "complies with the applicable land use plan but contains uses that are not permitted in the underlying base zone."

I40-3

A signalized intersection would be provided at the main driveway to the site, which does not necessitate a U-turn movement. All of the circulation movements outlined in this comment may be available but are not routes the majority of church users would take to access the site as shown in the Local Mobility Analysis (LMA) (DEIR Appendix J). As noted in that access analysis, the greatest traffic volumes would occur on Sundays when less traffic is using the local roads. City staff identified the intersection of College Avenue and Del Cerro Boulevard for a systematic safety review. The LMA conducted a review of the accident history for the latest available five years (2015–2019) at the intersection of College Avenue and Del Cerro Boulevard and concluded that no specific pattern of pedestrian-vehicle accidents was found for the study period. Therefore, no safety changes are needed at that location. General opposition to the project is addressed in Master Response 6 on that issue.

Comments

Responses

3.1.3.41 Letter I41: Teri Frazier

Letter I41

From: Teri Frazier <tfitness@gmail.com>
Sent: Friday, October 14, 2022 12:18 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] All People's Church: are the people: 636444

Attention,

I41-1

Project Name: All People's Church
Project Number:636444

Our Del Cerro community is not equipped for the infrastructure of such a mega project.

This property is not zoned for a church nor should the community plan change it!

Traffic congestion will be at a stand still.
Traffic will back up north and south bound on College ave as it already does this without the church traffic, routinely!
Adding a signal will back up the traffic further on College as well as onto the freeway.

Please decline approval of this project.

Thank you,
Teri Frazier

I41-1

This comment does not address the adequacy of the DEIR; instead, it provides general concerns with regard to the appropriateness of the site for a church. General opposition to the project is noted and is addressed in Master Response 6 on that topic.

Comments

Responses

3.1.3.42 Letter I42: Beth Friedenber

Letter I42

From: BethTravelPlan <bethtravelplan@gmail.com>
Sent: Friday, October 14, 2022 3:37 PM
To: Holowach, Courtney <CHolowach@sanidiego.gov>; DSD EAS <DSDEAS@sanidiego.gov>; Blake, Martha <MBlake@sanidiego.gov>
Subject: [EXTERNAL] ENVIRONMENTAL IMPACT— REPORT SAVE DEL CERRO

I42-1 I have raised a family, lived and worked in Del Cerro for 45 years. The community support for Del Cerro to remain the community it is as well as honor our community and do what is best for Del Cerro it paramount.

Using land that is zoned and approved for 24 housing units titled E to the land, which the city and community need and will, bring in needed tax dollars should not be violated.

1. **Housing Crisis** (SD City Councilmembers, the ones whose vote will determine the fate of this project), have all acknowledged that San Diego is in a severe housing crisis. Remind them there is already an approved 24 unit housing project e titled to the land. By approving the mega project, they are essentially voting NO on housing. Make it clear there is a viable alternate project. That is an important argument.

We must follow the Municipal Code.

2. **San Diego Municipal Code, Table 131-04B, Use Regulations Table for Residential Zones**, specifically disallows Religious Assembly in RS 1-7 Zoning. Without a general plan amendment This project would be a violation of San Diego's Municipal Code. Additionally, the Navajo Community Plan does not adequately incorporate or consider appropriate siting of religious institutions and would also need to be revised.

There is already traffic issues. This area and Freeway exit service Del Cerro as well as SDSU. More traffic can not be handled without impacting the community. This is residential community and it's infrastructure can only support our neighborhood. Not a facility that is not zoned for this land and bringing in large amount of traffic. Especially since this land is Zoned for homes.

3. **Environmental Concerns/VMT (Vehicle Miles Traveled):** The project applicant has admitted they expect 95% of the people attending their site to come from out of the area, and then leave the area, in essence doubling the greenhouse gas emissions as they cater to an audience from out of the area. This runs counter to the City's [Climate Action Plan](#) of reducing greenhouse gas emissions. (See attached image from the applicant's presentation)

Thank you for your time and consideration.
Beth Friedenber

BETH FRIEDENBERG
BethTravelPlan@gmail.com

I42-1

These comments do not address the adequacy of the DEIR. Refer to Master Response 3, which addresses the residential housing policy and the project's land use policy consistency. Regarding vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions impacts, the DEIR concludes that the project would not double the amount of GHG emissions in the local area or region. As demonstrated in DEIR Section 7.1.5, the project would not result in significant GHG emissions and would be consistent with the City's Climate Action Plan (CAP) by complying with the various GHG emissions reduction strategies outlined in the project's CAP Consistency Checklist (refer to DEIR Appendix B). Furthermore, a VMT screening analysis was conducted (refer to DEIR Appendix K), which shows that the project is presumed to not result in significant transportation impacts. Therefore, the project is consistent with the City's CAP and related policies.

Comments

Responses

3.1.3.43 Letter I43: Lee Fuhr

Letter I43 Mail - DSD1:AS - Outlook

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[EXTERNAL] All Peoples Church / No. 636444

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Retention: Inbox

Lee Fuhr <leefur@gmail.com> [Share](#) [Reply](#) [Forward](#) ...

To: DSD EAS Fri 9/2/2022 11:02 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

I43-1 | I live in the area of this project and I'm concerned about the environmental impact, the traffic impact, the cultural impact. From all I know of the project so far, I'm really really hoping it doesn't move forward in my neighborhood.

Lee Fuhr
Founder & Creative Director @ Cozy
Founder @ San Diego Digital Designers

[Reply](#) [Forward](#)

<https://outlook.office365.com/mail/DSD1:AS@sanidiego.gov/decplink?Prin> /1

I43-1

The comment does not address the adequacy of the DEIR. The topics of traffic and cultural resources are discussed in DEIR Sections 5.3 and 7.1.12 and conclude that project impacts would be less than significant for traffic and less than significant with mitigation incorporated for cultural resources. General opposition to the project is noted and is addressed in Master Response 6 on that topic.

Comments

Responses

3.1.3.44 Letter I44: Marie Garcia

Letter I44

From: Marie Garcia <mgarcia92120@gmail.com>
Sent: Sunday, October 16, 2022 3:57 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church No. 636444

Dear DSDEAS,

I44-1 Regarding the proposal to build the All Peoples Church (No. 636444) in the Del Cerro neighborhood of San Diego, I would respectfully request that the plan be reconsidered. The area is a tight knit community of single family homes and a few apartments. The land being proposed as the site for the church is already congested with traffic from SDSU and the 8 freeway. Building the church in this location would only add to traffic problems in the area. It would also have a negative effect on property values in the neighborhood which would then reduce property tax revenue generated by the county.

Please be a good neighbor and reconsider the proposed location of the church.

Thank you,

Marie Garcia
Resident
San Diego, CA 92120

I44-1

The comment does not address the adequacy of the DEIR. General opposition to the project is noted and is addressed in Master Response 6 on that topic. Transportation impacts are analyzed in DEIR Section 7.1.12. The transportation analysis conducted for the DEIR shows that the project would not result in significant VMT impacts. Improvements recommended in the Local Mobility Analysis (LMA) have been incorporated into the project design, as described in FEIR Chapter 3.

Comments

Responses

3.1.3.45 Letter I45: Jean and Franklin Gaylis

Letter I45

From: [Holowach, Courtney](#) on behalf of [DSD EAS](#)
To: [Holowach, Courtney](#)
Subject: Fw: [EXTERNAL] OPPOSITION TO ALL PEOPLES CHURCH
Date: Monday, October 3, 2022 8:24:56 AM

From: Jean <jeangaylis@gmail.com>
Sent: Sunday, October 2, 2022 4:32 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Cc: JEAN Edelstein GAYLIS <jeangaylis@gmail.com>
Subject: [EXTERNAL] OPPOSITION TO ALL PEOPLES CHURCH

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To City of San Diego, Development Services Department

Enclosed please find a testimonial which we, together with our neighbourhood friends, are submitting to you requesting that you stop the development of the project below, "ALL Peoples Church"

Our friends/ neighbours will be writing to you under separate cover.

Project name: All People's church

Project number 636444

SC# number: 201100394

Community plan area: Navajo

Council district: 7

My husband and my family have been residents of Del Cerro for the past 32 years.

I45-1 Upon hearing about the proposed building of All Peoples church, we are strongly considering moving out of the area because this huge big development is going to cause tremendous traffic congestion on College Avenue as well as Del Cerro Boulevard and will extremely hinder access to and from Highway 8 E. and West.

Not to mention the incredible increase (WHICH SAN DIEGO CANNOT AFFORD) in use of precious natural resources such as water and pollution, waste mismanagement, etc

Our community does not need this congestion and addition of hundreds and hundreds of pollution bearing cars and people on our neighbourhood streets.

We do not welcome any such a project and strongly urge the city of San Diego to stop the development of such a large project on an unsuitable, thin strip of land, right on the highway,

I45-1

Comment noted. However, the comment does not address the adequacy of the DEIR. The DEIR demonstrates the impacts referenced in this comment would be less than significant, including transportation (Section 7.1.12), water quality (Section 7.1.14) and waste management (Section 7.1.13). General opposition to the project is noted and is addressed in Master Response 6 on that topic.

Comments

Responses

145-1
(cont.) ↑ preventing highway access and definitely posing a dangerous problem on our streets,
if it were to be built.

Thank you for your consideration.
We are vehemently opposed to this project.

Sincerely,
Jean and Franklin Gaylis
6738 Del Cerro Boulevard
San Diego
California 92120

Comments

Responses

3.1.3.46 Letter I46: Cap Geis

Letter I46

From: Cap Geis
To: DSU-EAS
Subject: EXTERNAL| Del Cerro All Peoples Church - #636444
Date: Thursday, October 6, 2022 9:07:34 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To Whom it may concern;

I46-1 | I am writing as a very concerned resident of Del Cerro. I, along with every resident who lives here, uses the path from the freeway off ramps to Del Cerro Blvd. Building a Mega Church - Project Name: All Peoples Church - Project No. 63644 - with 100's of Participants many (if not every) days of the week would make coming home a nightmare!

We are already impacted with traffic problems from Hearst Elementary, State College, and 2 other churches that are in our neighborhood. Building this Church in the most impacted traffic areas of our neighborhood would make this impossible. The building of this Church itself will cause problems and the finished project would be an ongoing problem forever!

Please do not OK this project and keep our neighborhood accessible to us, the people who live here.

Thank you,

Cappie Geis

I46-1

The comment does not address the adequacy of the DEIR. Transportation impacts are analyzed in DEIR Section 7.1.12. The transportation analysis conducted for the DEIR shows that the project would not result in significant impacts to vehicle miles traveled (VMT) impacts. Improvements recommended in the Local Mobility Analysis (LMA) have been incorporated into the project design, as described in FEIR Chapter 3. General opposition to the project is noted and is addressed in Master Response 6 on that topic.

Comments

Responses

3.1.3.47 Letter I47: Laura Gingras

Letter I47

From: Laura Gingras <laura_gingras@yahoo.com>
Sent: Monday, October 17, 2022 4:38 PM
To: DSD EAS <DSD/EAS@sanidiego.gov>
Subject: [EXTERNAL] All People's Church/No. 636444

I47-1 Our three main concerns are the same as most people in the community:

1. Housing Crisis (SD City Councilmembers, the ones whose vote will determine the fate of this project), have all acknowledged that San Diego is in a severe housing crisis. Remind them there is already an approved 24 unit housing project e titled to the land. By approving the mega project, they are essentially voting NO on housing. Make it clear there is a viable alternate project. That is an important argument.
2. San Diego Municipal Code, Table 131-04B, Use Regulations Table for Residential Zones, specifically disallows Religious Assembly in RS 1-7 Zoning. Without a general plan amendment This project would be a violation of San Diego's Municipal Code. Additionally, the Navajo Community Plan does not adequately incorporate or consider appropriate siting of religious institutions and would also need to be revised.
3. Environmental Concerns/VMT (Vehicle Miles Traveled): The project applicant has admitted they expect 95% of the people attending their site to come from out of the area, and then leave the area, in essence doubling the greenhouse gas emissions as they cater to an audience from out of the area. This runs counter to the City's Climate Action Plan of reducing greenhouse gas emissions.

Laura Gingras

6455 Ridge Manor Ave.
San Diego, CA 92120
C: 559-280-5262

I47-1

These comments do not address the adequacy of the DEIR. Refer to Master Response 3, which addresses the residential housing policy and the project's land use policy consistency. With regard to vehicle miles traveled (VMT) and greenhouse gas emissions (GHG) impacts, the DEIR concludes that the project would not double the amount of GHG emissions in the local area or region. As demonstrated in DEIR Section 7.1.5, the project would not result in significant GHG emissions and would be consistent with the City's Climate Action Plan (CAP) by complying with the various GHG emissions reduction strategies outlined in the project's CAP Consistency Checklist (refer to DEIR Appendix B). Furthermore, a VMT screening analysis was conducted (refer to DEIR Appendix K), which shows that the project would not result in significant transportation impacts. Therefore, the project is consistent with the City's CAP and related policies.

Comments

Responses

3.1.3.48 Letter I48: John Larry Granger

Letter I48

From: JL G <grako@att.net>
Sent: Sunday, October 16, 2022 10:00 AM
To: Holowach, Courtney <CHolowach@sandiego.gov>
Subject: [EXTERNAL] All Peoples Church Project 636444

- I48-1 I am writing in opposition to the proposed development at the intersection of the 8 Freeway and College Ave. This intersection is the only viable entrance to that freeway from hundreds of residents in a large segment of the Del Cerro area. The church, while now at 900 members, will only grow if its business plan is successful and that will be a major traffic issue for that area. Additionally, while the church services on Sunday which will bring in a large number of cars all at once, the organization plans other activities during the week which will substantially add to traffic already made more heavy by San Diego State University.
- I48-2 The area was zoned for residential housing, and with the supposed housing shortage in San Diego, why is the city allowing a business/church to occupy an area where there is an alternative housing plan?
- I48-3 Environmental concerns should also address noise. The church uses electronic amplified music during its services which will clearly be an issue for surrounding neighbors who might never get a peaceful Sunday morning any longer. Additionally, the many cars arriving from surrounding areas will also increase pollution, noise and disturbances to the this peaceful community.
- I48-4 The addition of a new traffic signal which has been discussed is problematic for several reasons. The incline between north and south traffic on College Avenue is severe and is likely to present problems in implementing. It will also slow the flow of traffic by adding yet another lighted intersection within a very short distance to the freeway and beyond to SDSU. Commuting hours will be a nightmare.
- I48-5 We have lived here for five years. Del Cerro is a wonderful neighborhood that works well with the current university, synagogue, churches and other community agencies. This is an issue about severely reducing the quality of life for the families and people who live here. Please do not destroy this wonderful area of San Diego by approving this project.

Sincerely,

John Larry Granger
5827 Overlake Avenue

I48-1

The vehicle trips calculated for the project and used in the transportation analyses assume the church congregation and staffing will increase over time ultimately operating at its 900-seat capacity (refer to trip generation information in DEIR Appendix k); therefore, the DEIR does take into account congregation and staff growth that would occur in the proposed location. The claims made in this comment are speculative and not supported by the evidence. Furthermore, CEQA Guidelines Section 15145 prohibits speculation in an environmental analysis.

I48-2

Refer to Master Response 3 regarding the residential housing policy in the City.

I48-3

The DEIR Section 5.4 addressed all anticipated noise sources. Amplified music outside the confines of the church/sanctuary building is not proposed by the applicant. DEIR Section 7.1.2 addressed the project's operational air quality emissions and concluded that impacts would be less than significant.

I48-4

The traffic signal on College Avenue would increase delays but not cause any other intersections to operate poorly, triggering the need for access improvements in those other locations. The CEQA determination of significant impact is based on the project's vehicle miles traveled (VMT); it does not consider whether new delays would be caused along College Avenue. Refer to the transportation Master Response 5 regarding VMT, LMA, and the College Avenue operational changes.

I48-5

General opposition to the project is noted and is addressed in Master Response 6 on that topic.

Comments

Responses

3.1.3.49 Letter I49: Toni and Allen Gruber

Letter I49

From: Toni Donnet <toni.donnet@gmail.com>
Sent: Sunday, October 16, 2022 6:06 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church/No. 636444

Dear Ms. Courtney Holowach,

I49-1 My husband, Allen Gruber, and I are Del Cerro Residents. We have been San Diego residents since the 1970s and Del Cerro residents for over 12 years.

We are very concerned about the significant increase in traffic caused by a project this large. There are two ways to enter Del Cerro, the much more efficient entry and exit being from College Avenue, where traffic issues already exist.

On most weekday mornings, when SDSU has classes, there is a backup of traffic coming from and going onto Highway 8 and College Avenue to get to and from class, to say nothing of the traffic that already mixes with the residents leaving the neighborhood to go to work. Without a 900 seat Church, College Avenue and Del Cerro Blvd is a very busy intersection.

While the Church itself will be holding services primarily on Sunday, there will be additional use during the week, as well as offices, school classrooms and a multi purpose gym that will undoubtedly be utilized during the week. This is all additional traffic into and out of the neighborhood.

I49-2 Your report indicates no intent to create a primary educational school, but it does not indicate that such an additional use will not be forthcoming once the Church is built. With classrooms already included in the planned structure, it makes perfect sense to anticipate using the facility for an educational arm as well.

I49-3 Del Cerro is a residential neighborhood and without question this Mega Project will change the neighborhood's character, indefinitely. There are many churches in the neighborhood to satisfy the religious needs of the Del Cerro and SDSU residents. All Peoples Church is not fulfilling a use that does not already exist.

A Mega Project belongs in a Commercial setting where housing values will not be harmed by its presence.

Nothing about All Peoples Church belongs at the gates of Del Cerro. The Church obviously wants this location in order to have access to and proselytize the many thousands of SDSU students. It benefits the Church while harming our beautiful neighborhood.

We ask that this mega project be rejected and that the land be used in conformity with the Del Cerro neighborhood.

Thank you.

Toni and Allen Gruber
5821 Hampton Court
San Diego, CA 92120-4501
619 549 8072

I49-1

This comment does not address the adequacy of the DEIR. An analysis of the project's transportation impacts was conducted and presented in DEIR Section 7.1.12. No significant impacts are identified in the DEIR.

I49-2

As correctly stated in this comment, a primary school is not a proposed use. In order to operate a school, the church would have to obtain a permit amendment through the City. It is speculative to suggest that school would be operated on site, and CEQA Guidelines Section 15145 prohibits speculation in an environmental analysis.

I49-3

Neighborhood character was analyzed in DEIR Section 5.5 and determined to be a less-than-significant impact; refer to Master Response 4 on neighborhood character contained in this FEIR. Refer to the Master Response 6 regarding the need for the project. Housing values are not required topics of discussion in EIRs. General opposition to the project is addressed in Master Response 6.

Comments

Responses

3.1.3.50 Letter I50: Lesley Halpern

Letter I50

From: Lesley Halpern <halpern07@gmail.com>
Sent: Sunday, October 16, 2022 9:22 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church/No. 636444

I50-1 After reviewing the EIR and after the church confirming 95% of their parishioners would be coming from the South (freeway entrances) rather than the neighborhood, I have great reservations that all those exiting will not wait in a que for the light at the main church entrance to turn left towards the 8 freeway. They will likely become impatient and choose to instead exit the North parking lot right turn only driveway and will be faced with 'No U Turns' at the traffic light at Del Cerro Blvd/College Ave intersections and will have to go further into the neighborhoods to achieve their U Turns. Also to be considered is that the church has events/services during many evenings which could result in backup traffic on College going north [bound.as](#) many people are no longer working from home and utilize the 8 via College Ave to commute.

Thank you,

Lesley Halpern

I50-1

This comment does not address the adequacy of the DEIR. An analysis of the transportation effects of the project was provided in DEIR Section 7.1.12 and less-than-significant impacts were identified. All of the circulation movements outlined in this comment may be available but are not routes the majority of church users would take to access the site as shown in the Local Mobility Analysis (DEIR Appendix J).

Comments

Responses

3.1.3.51 Letter I51: Bryan Harris

Letter I51

From: Bryan Harris <bmhar35@gmail.com>
Sent: Monday, October 10, 2022 2:50 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] All peoples church 636444

Hello,

I51-1 | I am writing to inform you that I do not approve of the new development plan in Del Cerro. This will greatly impact our environment, decreasing open space, vegetation and water run off. Beyond that the traffic patterns will be greatly influenced by the new influx of cars coming and going. There is also a plan for a 6 story apartment complex in the area. Del Cerro is a suburban family neighborhood and should not be changed with all of this new construction.

Thank you,

Bryan Harris
5890 del Cerro blyd
Dan Diego, CA 92120
619-867-6220

I51-1

The DEIR studied all of the environmental concerns expressed in this comment in Sections 5.1 (Land Use), 5.2 (Biological Resources) and 7.1.7 (Hydrology) and 7.1.14 (Water Quality). Refer to Master Response 2 regarding cumulative effects. General opposition to the project is addressed in Master Response 6.

Comments

Responses

3.1.3.52 Letter I52: Shain Haug

Letter I52

From: Shain Haug <shainh_2000@yahoo.com>
Sent: Saturday, September 17, 2022 12:51 PM
To: DSD EAS <DSDEAS@sandiego.gov>; Tom Marshall <tomarsha@cabrillo.edu>; David Smith <david.smith@eldpinc.com>

Livingston <dlivings2000@hotmail.com>

Subject: [EXTERNAL] IR for All Peoples Church/No. 636444

I52-1 The following was received this morning from Tom Marshall. He is on the email contact list by which I send out information about NCPI to our community. My communications included the means to access the EIR on the city website. I received this as NCPI Secretary and I concluded that this resident's position should be received by the NCPI Board. On behalf of the Board I am thanking him for his contribution.
Shain Haug

I52-2 On Saturday, September 17, 2022 at 09:33:05 AM PDT, Tom Marshall <tomarsha@cabrillo.edu> wrote:

I am writing to object to several mistakes and some blatant propagandizing included in the EIR for All Peoples Church/No. 636444. I am not an expert in all the areas that have caught my attention, but I am a nearly lifelong resident and user of the general area where this proposed project would be built. I pass through the exact area frequently these days.

The first and most obvious concern for me is traffic. This project would hugely alter the flow of traffic in an already heavily impacted area. The intersection of College and Del Cerro could become badly backed up in all directions with this insertion of a simultaneous traffic load of three-hundred-or-more cars at times. The traffic load at Friars Road Cost Co, familiar to us all in this part of town, where the city has created a dreadful permanent snafu, is usually only thirty or forty cars from each direction at its worst. Multiply that by five or more, and you will begin to see the mess being proposed. The addition of turn lanes in both directions on College will only make this worse with so little room for them or for traffic back-ups beyond them. This would be especially problematic down the hill toward the freeway. Congestion from SDSU traffic in addition to the regular flow of neighborhood traffic is already a problem of noise, air pollution, and environmental deterioration. Adding the load of churchgoers would make it obscene. The EIR is incorrect in judging these impacts to be negligible, way wrong and dead wrong.

I52-1

Comment noted.

I52-2

Project transportation effects are addressed in terms of vehicle miles traveled (VMT) in DEIR Section 7.1.12. The analysis conducted for the project shows that the additional trips it would produce would not result in significant impacts related to VMT. The turn lanes at the main driveway recommended in the Local Mobility Analysis (LMA) would be created by narrowing the College Avenue median and not simply by restriping the existing pavement. Since the majority of church traffic would occur on Sunday mornings when SDSU is not in session, the conditions described in this comment are speculative.

With regard to neighborhood character, refer to Master Response 4 on that issue. As noted in that response, the change in site character is described in detail and illustrated in figures that contain visual simulations in DEIR Section 5.5; impacts were determined to be less than significant based on the City's significance determination thresholds. The request for deviations from the residential zone development regulations allows the church structure to create visual interest through the creation of three towers and the retaining walls allow the structure to be placed as far as possible from the nearby residential neighborhood. Both elements of the design help to minimize the project's character changes.

Given its historical disturbance and infill location isolated from regional open space systems, the site's existing biological resource quality is low. The project's impact to on-site biological resources was determined to be significant and mitigable in DEIR Section 5.2. Mitigation measures would be ensured as conditions of approval.

With regard to hydrology and water quality, the project would construct a series of drainage facilities and four biofiltration basins to capture, detain, infiltrate and treat runoff produced on site. No adverse impacts to drainage or water quality would occur, as described in DEIR Section 7.1.7. Therefore, project impacts to drainage flows within Alvarado Creek would not occur, consistent with the stormwater regulatory framework and permitting requirements.

Comments

Responses

152-2
(cont.)

Linked to these proposed traffic changes is the issue of “neighborhood character.” Neighborhood character is certainly challenging to define, partly because it changes, but on-going history is one important key to that kind of definition. This project, in terms of history or of present look, is undeniably a monstrous change for Del Cerro. Its location, admittedly taking advantage of a piece of real estate beside the freeway for advertising purposes (v. objective #1 in ES-1), stands out immediately as a big change. These buildings would be the first thing most people see of Del Cerro and would set a completely different tone for the neighborhood, calling out for attention and appealing to a very restricted portion of the population. The proposal’s request for a deviation from the rules that apply to everyone else, in order to allow the erection of yet another blatant advertisement—the cross, is grossly vulgar. Religious assembly is a great freedom guaranteed by our laws, but blatant trumpeting of a particular religion is not. This eyesore to most of us would be completely out of character with Del Cerro and its history.

My other big area of contention with this EIR and plan also has to do with the “character” of Del Cerro but over a much longer term. This location has a major ecological function and practical function as a buffer zone from the freeway and for the drainage of this area. The spot is not isolated from its larger drainage, though corruptions of the landscape over the years may have made it seem so.

My residence in Allied Gardens over parts of seven decades, my childhood habit of fishing at Lake Murray, my presidency at Lewis Jr High involving me with the Del Cerro community, and my shopping at what is currently Windmill Farms on Del Cerro Blvd, all have put me in touch with the landscape in and around the neighborhood of this project. I have watched the connected Adobe Falls area nearby fill in and get re-landscaped over the years. I am, again, no scientific expert about this, but my acquaintance with the landscape and changes brought about by human manipulation prompt some strong opinions based on my experience as a kid, a birder, a botanist, and now an amateur entomologist.

As kids, we roamed this area and chased its lizards alongside the roadrunners. Del Cerro was minimally developed when I first saw it. The freeway was not there yet. We lived just east on Maryland in La Mesa where a stream flowed west and connected our neighborhood to Del Cerro on the other side of the Murrav dam and on into Adobe Falls. When I later lived in Allied Gardens, I discovered that this same flow of water connected

No evidence has been provided in this comment as to the inadequacy of the DEIR. Thus, no additional response is required.

Comments

Responses

152-2
(cont.)

further west through Adobe Falls and on into the San Diego River in Grantville—and it still does. Broken up now by lot-building, landscaping, road-building, flood channels, and culverts, this stream (called Alvarado Creek on some maps) is an artery for this nursery of flora and fauna.

The proposed project is another interruption in this flow and its ecological service to the larger natural community. Even the current situation, with a dirt catchment basin at the freeway end of the property under consideration for development, maintains a useful role in the water supply and drainage of this area. Adobe Falls is presumably still there, though the immediate area is closed to any trespassing by the University and held as the “SDSU Alvarado Canyon Ecological Area.” Its ecology includes that whole Alvarado Canyon corridor in which the building and paving proposed would cut down on absorptive surface by a large percentage. This would affect both groundwater and surface flow to the lower creek all the way to the river. Areas like this, with year-round or a good seasonal flow, are essential to the life cycles of many local fauna and flora.

For instance, this year in my corner of Allied Gardens, I have observed many of our more bright and beautiful neighbors making use of the nearby waters of the river (as they used to also use the creek that ran where Allied Road was eventually added onto the neighborhood) for sustenance, dwelling, reproduction, and interaction. These include birds (*Icterus cucullatus*), dragonflies (*Libellula saturata*), moths and butterflies (*Leptotes marina*), spiders and other “creepy”-crawlies (*Peucectia viridans*), reptiles (*Uta elegans*), as well as many many delightful others. These species are not protected rarities but everyday parts of our neighborhood. And they are not there just for our delectation. Their lives form the natural basis of our own. Our sciences are just beginning to uncover the interweavings involved. Our regulations have begun to respect them. Spots with water like Adobe Falls, Alvarado Creek, and the river bend by the mission support these life cycles and demand protection. Spots with infrequent water, like the parcel proposed for development, also help by absorbing and slowing the westward flow of the water on that drainage and deserve protection as well.

The law provides such protection in many ways, even zoning. One of the many reasons why “single-family dwelling” zoning should not be allowed deviation is the violation of such important open surfaces for absorption of rain. Getting less rain these days makes this even more significant. Every square foot covered with an impervious (and often pollutant-laden)

Comments

Responses

I52-2
(cont.)

surfacing is a danger to us all. This project on this site would become a grave danger to this natural nursery area. If only for its damselflies and dragonflies, this would be a treasured spot. Building the proposed monstrosity less than a mile upstream from the sensitive nursery area (whatever streaming gets through these days) is a direct offense to the local ecology. Where the proposal says "all runoff water from the project would be collected and treated on the project site in water quality basins and discharged into the city storm water system," it is revealing a gross error about the best practice in usage of that water. Polluted by automotive leakages, yes, this water should be filtered or diverted, but allowed to fall on filtering ground and to enter the local water-cycle this storm-water would be the resource that it truly is and should be.

There has been a history of mistakes in regard to local hydrology, leading to the point now where people can hardly see what nature was up to here. Mistakes have been made in a number of ways over the years of deciding what to do with this stream and its drainage. Cement troughs, dirt drain-basins, culverts, and roads mar its flow. We cannot allow ourselves to add to that. There must be no SDP for this proposed project. Attempts at mitigation would only fall short and create further hazards for the Alvarado Creek area. Further interruption of the natural vegetation and its long-term achieved density would disrupt lives and hydrology there. Though the report has it accurately that there are "no wetland or riparian communities present on the project site," this site is a link with nearby riparian areas like the SDSU preserve; it is what they now call an "ecotone" joining wet zone to wet. Causes raised there can affect areas well beyond the boundaries of this project's own property. The proposal would create effects all along the corridor of Alvarado Creek. Raising the ground level, leveling the ground level, paving and building (to cover 41% of the area—sec 7.1.7), draining away run-off, and other aspects of the proposed project will create small natural disasters for the immediate area and downstream. The "Impact Analysis" in sections 5.2.4.2 & .3 is simply wrong; it follows a seriously flawed logic, a classic fallacy, in saying that the lack of wetlands on the project site means the project would have no impact on wetlands. This is false and falsifying; it shows that the argument here is falsely framed by the proposers and suggests that their ignoring actual cause-and-effect in nature may not be mere ignorance.

Comments

Responses

152-2
(cont.)

Specific sections of the EIR where falsifications and fallacies show up include 5.5.2.1 (failure to “provide for the long term conservation and sustainable management” of resources), 5.5.4.1 (failure to avoid strong contrast with surrounding development or natural features), 5.5.4.2 (failure to consider the impact in nature beyond immediate property), 5.5.6.1 (failure to consider the full impact of grading on hydrology in and around the property), 6.1 (failure to consider wider area, though the SDSU Ecological reserve is mentioned), 7.1.7 (failure to avoid impervious covering of ground with 41% coverage, and failure to use water as resource), and 7.4 (causing irreversible changes to landscape in and around the property—There has recently been a removal of trees on about half of the property, possibly the very trees mentioned in the EIR as nesting places for the Cooper’s Hawk that must be preserved). To approve the project would be to go against several existing objectives and regulations adopted by the city, mentioned in these EIR sections and elsewhere.

So, as invited to comment “on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated” (CEQA Guidelines Section 15204), I must say that the only legal and proper choice with this project is to determine that “No Project/No Development” may go on.

Most sincerely,
Rev. Dr. Thomas C. Marshall
6885 Cartwright Street
San Diego, CA 92120

(619) 582-4230
ToMarsha@Cabrillo.edu

Comments

Responses

3.1.3.53 Letter I53: Marilyn Hinck

Letter I53

From: Jeff and Marilyn Hinck <jeffandmarilyn@cox.net>
Sent: Friday, October 7, 2022 7:56 PM
To: DSD EAS <DSDDEAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church/No. 636444

I53-1 I live on Del Cerro Blvd west of College Avenue. I oppose this project for the following reasons: loss of open space "breathing room" for us, as well as habitat for hawks, coyotes and other animals; light and noise intrusion on neighboring residents; and traffic and circulation hazards created by the project.

First, removal of this open space and its vegetation and paving over or building on it eliminates permeable soil surfaces. It would eliminate hunting ground for the red tail hawks that I regularly see in that area and disrupt the movement corridor of coyotes as well as other animals. These losses cannot be offset by dollars. Nor can dollars provide the respite of open natural spaces like this one in my neighborhood.

I53-2 Second, the kind of lighting used in public spaces such as this proposed project, would surely create light pollution for the residents on Marne Avenue and Glenmont Street. They are already impacted by the very bright lighting that has increased on the SDSU campus. The noise generated by the mere presence of this project and its stated activities would also impact their quality of life. Quiet peaceful Sunday mornings with a cup of coffee would be no more.

I53-3 Finally, I am very concerned about the increased traffic and circulation hazards created by this project. I don't want my neighborhood to become the next Point Loma, where residents have to plan their window of coming and going because of the impact of the Rock Church and Hi-Tech High on traffic in their area. The traffic corridor on College Avenue has already seen increasing backups at the Del Cerro Blvd intersection and the I-8 interchange. Cars regularly run the red light turning southbound from westbound Del Cerro Blvd. Cars also speed down the hill southbound through the light on College Avenue. Placing another signal southbound on a downhill curve so close to the Del Cerro Blvd intersection does not seem safe. The left hand turn lane will not be able to contain the cars stacked to turn and will back up in the through lane. In addition, a proposed housing project on Del Cerro Blvd will add more regular daily trips to this intersection. As stated in the EIR, All Peoples Church's objective is to "relocate to a church-owned property that has proximity to its existing congregation, including its members in City Heights, Mid-Cities, College Area, and Del Cerro." It seems that the current location of this church on University Avenue is a better match to where their congregants live.

I53-4 I would like to urge the Navajo Community Planners and the City Council to reject this project. It is a bad fit for our neighborhood and would negatively impact our quality of life.

Respectfully,
Marilyn Hinck
5664 Del Cerro Blvd

Sent from my iPad

I53-1

These comments express opposition to the project and do not address the adequacy of the DEIR. However, the environmental concerns expressed in this comment are addressed as potential project impacts in DEIR Sections 5.2 (biological resources), 5.4 (noise), 5.5 (visual/neighborhood character/lighting), and 7.1.7 (hydrology). Where significant impacts are identified, mitigating measures are identified to reduce the impacts to less than significant. Although the project site is vacant, it is planned for future development in both the General Plan and Navajo Community Plan. Refer to Master Response 6 on general opposition.

I53-2

All project lighting and noise would comply with the City regulations in the San Diego Municipal Code.

I53-3

Transportation is analyzed in the DEIR Section 7.1.12. The project would not result in significant impacts to College Avenue, including its intersection with Del Cerro Boulevard, based on the Vehicle Miles Travelled (VMT) analysis in DEIR Appendix K. Refer to Master Response 5 regarding the College Avenue operational changes.

I53-4

Refer to the Master Responses 1 and 2 regarding cumulative impacts and alternative location or use. General opposition to the project is addressed in Master Response 6.

Comments

Responses

3.1.3.54 Letter I54: Jeff Hinck

Letter I54

From: jeff hinck <jeffandmarilyn@cox.net>
Sent: Tuesday, October 11, 2022 2:59 PM
To: DSD EAS <DSD EAS@sandiego.gov>
Subject: [EXTERNAL] All Peoples church/ No.636444

- I54-1 I'm a longtime Del Cerro Blvd homeowner, and I oppose this project for the following reasons:
.....The project is not zoned for this type of occupancy, and use. The Church already owns land on University Avenue which is zoned for a church occupancy.
- I54-2Two types of sensitive habitat would be destroyed and built over. The mitigation measures proposed are totally inadequate.
.....Wildlife corridors between Alvarado Canyon/ Lake Murray dam, and Adobe falls would be eliminated.
.....The EIR was done during a severe drought period and fails to note that species counts, and varieties were probably not accurate, Therefore do not represent the true character of the area.
- I54-3Proposed traffic circulation measures (adding an extra stoplight between Highway 8 westbound and Del Cerro Blvd) will definitely worsen circulat atterns in an already extremely busy area.
- I54-4 This project if built would severely effect the area in a negative way. The proper alternative should be the " no project alternative".

Thank you,

Jeff Hinck
5664 Del Cerro Blvd.
San Diego CA 92120

I54-1

General opposition to the project is addressed in Master Response 6. The church is permitted within the residential zone, upon approval of a Planned Development Permit, as discussed in Master Response 3 on land use policy consistency. The City does not have a zone classification for church or religious institutions.

I54-2

The biological mitigation measures outlined in DEIR Section 5.2 are consistent with the City Biology Guidelines and MSCP. The project site is located in an urbanized area of the City and is not located within or adjacent to any wildlife corridor, including the MHPA. Regarding the biological studies, vegetation mapping and a jurisdictional delineation were conducted on site on October 14, 2014; vegetation mapping was confirmed on April 3, 2019; and sensitive plant surveys were conducted on April 9, 2015, and April 3, 2019.

I54-3

A new traffic signal would be installed along College Avenue south of the Del Cerro Boulevard intersection, as described in DEIR Chapter 3 and Section 7.1.12, and would function in accordance with the City standards. The claims made in this comment are speculative and not supported by the evidence. CEQA Guidelines Section 15145 prohibits speculation in an environmental analysis. Refer to Master Response 5 regarding the College Avenue operational changes.

I54-4

The No Project Alternative would not achieve any of the project objectives, as described in DEIR Section 8.3.3.

Comments

Responses

3.1.3.55 Letter I55: Jon Hoidal

Letter I55

From: Jon Hoidal <jhoidal@hotmail.com>
Sent: Monday, October 17, 2022 2:39 PM
To: Holowach, Courtney <CHolowach@sanidiego.gov>
Cc: Blake, Martha <MBlake@sanidiego.gov>; DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Del Cerro project

Dear Courtney,

I55-1 | We are very concerned about the approval of a mega church in Del Cerro. Our area has always been a quaint residential area with more than enough traffic that services the neighboring San Diego State and Allied Gardens and San Carlos neighborhoods. Adding a huge church we're 95% of all the members are not even residential occupants of the area is insane. Think of the traffic? Additionally, isn't there a housing shortage that this property could help alleviate? I understand it's approved for 24 residences.

I look forward to seeing what you do in this matter.

Sincerely

Jon Hoidal

I55-1

These comments express opposition to the project and do not address the adequacy of the DEIR. Transportation impacts of the project are addressed in DEIR Section 7.1.12 and would be less than significant. Refer to Master Responses 3 and 5 on general opposition and residential housing policy.

Comments

Responses

3.1.3.56 Letter I56: John Hood

Letter I56

From: john hood <john-hood@cox.net>
Sent: Sunday, October 16, 2022 10:38 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Draft Environmental Impact Report SAP No. 24008189

Draft Environmental Impact Report
SAP NO: 24008189
All Peoples Church/Project No. 636444
From:
Johnny Hood
6385 Rockhurst Drive
San Diego, CA. 92120
Date: Oct. 16, 2022

To:
The City of San Diego
All Peoples Church / Project No. 636444
SCH No. 2021100394
Community Plan Area: Navajo
Council District: 7

Subject:
All Peoples Church/Project No. 636444
Draft Environmental Impact Report
Liabilities/Concerns/Impact

We in the community of Del Cerro have grave concerns with density and expansion of traffic, massive architectural structure, influx of population, safety, crime and noise. This community is quiet and friendly, a seclusion for retired personnel, we have active supportive organizations and groups for businesses, (Temple Emanu-El, Phobe Hearst Elementary School, Windmill Farms, KnB Bistro, Chevron Gas Station, Madra Liquor & Deli, Taco Kings, Nails Salon, Einstein Bros. Bagels, Define U Fitness, and others).

The traffic flow is minimal at the College Blvd/Del Cerro Blvd, pedestrians/ joggers /pets feel safe crossing at the intersection, commuters from Allied Gardens, Del Cerro and San Carlos communities utilizes College Blvd/Del Cerro Blvd/Madra Ave. with minimal congestion.

If and when the landscape is altered the Del Cerro community will be impacted with heavy traffic, noise, safety to pedestrians/joggers/pets, air quality from vehicles will elevate; so, will the atmosphere at Phobe Hearst Elementary school. Traffic at Phobe Hearst Elementary will increase, safety becomes an issue and concerns; not only with traffic but homeless personnel/sexual predators.

Parking spaces will be affected, traffic noise with parking lots and safety concerns in the vicinity of the structure(s) and parking area/lots. The business parking lot will be impacted with non-business vehicles, sanitation with the parking lots will constantly be a problem.

The population will increase (density) along with unwanted criminal activities/personnel to the businesses and educational complex in our Del Cerro community.

I56-1

I56-1

These comments express general opposition to the project but do not address the adequacy of the DEIR. Refer to Master Response 6 on general opposition. For the Local Mobility Analysis (LMA), City staff identified the intersection of College Avenue and Del Cerro Boulevard for a systematic safety review. The LMA conducted a review of the accident history for the latest available five years (2015–2019) at the intersection of College Avenue and Del Cerro Boulevard and concluded that no specific pattern of pedestrian-vehicle accidents was found for the study period. Therefore, no safety changes are needed at that location. The DEIR Sections 5.4, 7.1.2, and 7.1.12 and included an analysis of transportation, noise, and air quality impacts, all of which were determined to be either less than significant (transportation, operational noise, and air quality) or less than significant with mitigation incorporated (construction noise).

Comments

Responses

156-2	Biological concerns; The environmental impact from North I-8/College Avenue are sanctuary for multiple species, birds, rodents and floral and fauna, soil erosion. The ecosystem anywhere is fragile, elimination of one or few will impact the environment, the flowering plants are food to many species, pollinators, rodents and birds.
156-3	Indigenous cultural resources; The history of the Kumeyaay Nations exist from the mountains to the Pacific Ocean, scattered and litters of minute or larger deposits of artifacts are layered beneath the landscape, much have been developed and ignored of their presence. Some collecting dust in museums across this country and globe. We have to be vigil to the sensitivities/presence of Indigenous people's past histories/cultural traditions and ancient sites whenever soil is broken for development. It is proper to inform the Kumeyaay Nations of all development of properties and land in Southern California, they are relevant, the travesty of assimilation and indoctrination of the Indigenous people is how the land cessions by non-Indians were acquired.
156-4	<p>Summary: The State, the City, the County all have duties and services to the people in the State of California, it is in the interest of all voices, the elders, children, adults, veterans that sound, positive judgmental decisions are balanced with measured opinions and justifications are considered so the community of Del Cerro to continue to prosper in their educational support, provide and support their community businesses, govern self-sufficiency for community programs/projects and safety for all.</p> <p>Density in population, structures and traffic will impede and impact numerous negative elements. Your dedications/commitment to your communities and people can be beneficial for progress.</p>

156-2

DEIR Section 5.2 identifies significant impacts to biological resources and mitigation to offset those impacts. This comment does not provide any specificity with regard to the analysis contained in the DEIR.

156-3

Pursuant to state and local law, the City conducted a consultation with the Native American groups as part of the Assembly Bill 52 requirements (refer to DEIR Sections 2.4.1.2, 5.3, and 5.6 for additional information. DEIR Section 5.3 identifies Mitigation Measure HR-1 which requires cultural resources (archaeological resources) protection during project construction, including the use of a Native American consultant/monitor during soil disturbing and grading/excavation/trenching activities. If Native American resources or remains are discovered during construction, the mitigation measure further outlines specific protocols for involving tribal entities in the evaluation and disposition process. Similarly, that same mitigation measure would address potential impacts to tribal cultural resources, as stated in DEIR Section 5.6. Therefore, measures are in place to protect any Native American resources encountered during project construction.

156-4

The comment does not address the adequacy of the DEIR. General opposition to the project is noted and is addressed in Master Response 6 on that topic.

Comments

Responses

3.1.3.57 Letter I57: Aleyda Hoskins

Letter I57

From: Aleyda Hoskins
To: DSD-EAS
Subject: EXTERNAL| All Peoples Church/No. 636444
Date: Tuesday, October 4, 2022 10:28:52 AM

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To Whom it May Concern,

I57-1 I am writing as a concerned citizen residing on Lomond Drive (92120) near the location of the proposed All Peoples Church project No. 636444. The idea of a church of this size in the desired area is not sound and ridiculous.

Anyone that lives in this part of town knows that traffic will be greatly impacted. Animal habitats will be destroyed. Noise pollution will skyrocket and there is no support for such a large venue. The idea that a multi-purpose room and gym is to be made indicates that there will be traffic all of the time and not mostly on Sundays as the project description depicts.

I57-2 I am not against houses of worship as there are already many in this area. I am against one that will destroy natural habitats, increase traffic causing more problems, create a brighter night with light pollution and contaminate the quiet night with added sound pollution.

I57-3 I ask that you please consider and decline the project (#636444) that is being submitted.

Thank you,
Aleyda Hoskins
619-787-9506
--

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I57-1

The comment does not contain any specific comments on the adequacy of the DEIR. The DEIR Sections 5.2, 5.4, and 7.1.12 do address transportation, biological resources, and noise effects from the project. General opposition to the project is noted and is addressed in Master Response 6 on that topic.

I57-2

General opposition to the project is noted and is addressed in the Master Response 6 on that topic. All project lighting and noise would comply with the City regulations in the San Diego Municipal Code.

I57-3

General opposition to the project is noted and is addressed in the Master Response 6 on that topic.

Comments

Responses

3.1.3.58 Letter I58: Redelle Hrastich

Letter I58

From: Redelle Hrastich <rhrastich@cox.net>
Sent: Saturday, October 8, 2022 10:53 AM
To: DSD EAS <DSDDEAS@sanidiego.gov>
Subject: [EXTERNAL] EIRReport

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I58-1 | Re: All Peoples Church, #636444
Building a church on this site would be a nightmare! Traffic would be insane, it would destroy a lovely natural canyon environment. There are plenty of churches in this area, All Peoples Church would be better off renovating an already existing vacant building...maybe in Mission Valley. Last year I was hit in my car while crossing College Ave/Del Cerro Blvd., by a young man in brand new BMW that ran the red light. Nothing good can come of this Church building at this site!
Redelle Hrastich
5565 Cambria ct. SD, 92120

I58-1

General opposition to the project is noted and is addressed in Master Response 6 on that topic. Transportation impacts of the project are addressed in DEIR Section 7.1.12.

Comments

Responses

3.1.3.59 Letter I59: Loretta Huckabone

Letter I59

From: Loretta Huckabone <loretta.huckabone@cox.net>
Sent: Saturday, October 15, 2022 10:32 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Cc: Loretta Huckabone <loretta.huckabone@cox.net>
Subject: [EXTERNAL] All Peoples Church| No.636444

I59-1 I consider Del Cerro to Now to be one of the finest single-family residential neighborhoods in San Diego. It is now under threat.

I originally was not opposed to the All Peoples Church construction because I thought it was better than a large apartment construction. Now I find we face both the possibility of the church construction and a 6-story apartment building. The approval of the church will cause deterioration of quality of life in the neighborhood, cause real estate values to drop, and make it more likely that a large apartment building will soon follow.

The church will create traffic congestion and unsatisfactory traffic conditions on College Avenue.

The location in which the church proposes to build is more suitable for open space, which our city needs.

Loretta Huckabone Per:All Peoples Church NO.636444
5651 Dell Cerro Blvd.
San Diego

I59-1

Refer to Master Response 2 regarding cumulative impacts. The comments provide general concerns and do not address the adequacy of the DEIR. Transportation impacts of the project are addressed in DEIR Section 7.1.12. General opposition to the project is noted and is addressed in Master Response 6 on that topic. Master Response 5 also provides detail regarding how the VMT analysis is used to address both direct and cumulative impacts, consistent with the Office of Planning and Research guidance for assessing transportation impacts under CEQA.

Comments

Responses

3.1.3.60 Letter I60: Loretta Huckabone

Letter I60

From: Loretta Huckabone <loretta.huckabone@cox.net>
Sent: Sunday, October 16, 2022 11:02 AM
To: DSD EAS <DSD EAS@sanidiego.gov>; Loretta Huckabone <loretta.huckabone@cox.net>
Cc: Loretta Huckabone <loretta.huckabone@cox.net>
Subject: [EXTERNAL:] All Peoples Church
Re: All Peoples Church636444

I60-1

I believe that Del Cerro is NOW one of the finest single-family residential areas, but it is now under a great threat.

I originally did not oppose the construction of the All Peoples Church because I felt it was better than a large apartment building. Now we are faced with not only the construction of the church but also a 6-story apartment building. The approval of the church will deteriorate the neighborhood and make the approval of the 6-story apartment building more likely.

The church will create great traffic problems on College Avenue.

Please do not approve the construction of the church. The solution to the problem of housing is not the ruination of the nice neighborhoods we already have.

Loretta Huckabone
5651 Del Cerro Blvd.
San Diego

I60-1

Refer to response to comment I59-1 from the same commenter; no additional response is required.

Comments

Responses

3.1.3.61 Letter I61: Sharon Hudnall

Letter I61

From: Sharon Hudnall <sharonanhudnall@gmail.com>
Sent: Friday, October 7, 2022 5:34 PM
To: DSD EAS <DSD EAS@sandiego.gov>
Cc: CouncilMember Raul Campillo <RaulCampillo@sandiego.gov>
Subject: [EXTERNAL] Draft Environmental Report - All People's Church Project (No. 636444)

As a long-term homeowner and rental property owner in Del Cerro residing approximately 2.5 blocks from the proposed site for construction of the All People's Church complex, I strongly object to this project. My objections concern the EIR draft findings concerning the following:

- I61-1 1. Construction of the proposed 54,476 SF building and 71,010 SF parking facility on a 6-acre lot will destroy important green space and wildlife habitat that provides a noise and air quality buffer between the I-8 freeway and Del Cerro Blvd. as well as adjacent residential streets. Further, the massive, multi-story project would impair the valued aesthetic elements of the existing gateway to Del Cerro. Further, the project poses a threat to the environmental health of the community during and permanently after construction.
- I61-2 2. The operation of the church will contribute to gridlock on College Ave. and Del Cerro Blvd during peak hours of service. Further, if a proposed 114-unit, 6 story apartment development is constructed within a very close distance to the church lot, the combined projects will add over 1,000 vehicles to that intersection. The inclusion of a 900-space parking facility indicates it is not a transit-oriented development. Further, the church would draw thousands of attendees largely from outside Del Cerro and would not be an amenity primarily benefiting the residential community it impacts.
- I61-3 3. The site would not provide adequate egress for fire department vehicles in an emergency situation.
- I61-4 4. The project would not generate ongoing tax revenues for the city commensurate with the costs of adding and maintaining infrastructure. If the church is not 100% energy conserving through solar power generation, it will be a major non-green energy consumer.
- I61-5 In short, the project does not add essential services or amenities and will irrevocably impair quality of life in the Del Cerro community.

Submitted by: Sharon A. Hudnall
Address: 6373 Lambda Drive, San Diego, CA 92120

I61-1

These comments are general in nature and do not provide specificity with regard to the adequacy of the DEIR. DEIR Sections 5.2, 5.4, 5.5, 7.1.2, and 7.1.6 address the project's potential for significant impacts on biological resources, noise, air quality, aesthetics and public health. All of the impacts would be less than significant or less than significant with mitigation incorporated.

I61-2

The claims made in this comment are speculative and not supported by the evidence. Refer to Master Responses 2 and 5 regarding the College Avenue operational changes and cumulative impacts. The project does not include 900 parking spaces, it includes 356 parking spaces, as stated in DEIR Section 3.2.2.

I61-3

The project site plan has been reviewed and approved by City Fire - Rescue Department staff and ingress and egress would be built consistent with City fire code regulations.

I61-4

This comment does not address the adequacy of the DEIR.

I61-5

General opposition to the project is noted and is addressed in Master Response 6 on that topic.

Comments

Responses

3.1.3.62 Letter I62: Sharon Hudnall

Letter I62

From: Sharon Hudnall <sharonanhudnall@gmail.com>
Sent: Saturday, October 8, 2022 9:21 AM
To: Council Member Raul Campillo <RaulCampillo@sandiego.gov>; DSD EAS <DSEAS@sandiego.gov>
Subject: [EXTERNAL] Fwd: 6-Story Apartment Complex - Del Cerro Blvd.

Subject: 6-Story Apartment Complex – Del Cerro Blvd.

I62-1 I share the community's serious concerns regarding the high density apartment complex (Cerro House) proposed by Tapestry Development/Jeff Katz and strongly oppose this project.

Del Cerro is already a "complete community." The imposition of a 114-unit development was not vetted with area residents and violates all standards of sound community planning. The apartments will serve as over-subscribed student housing with overflow parking slated for adjacent residential streets, including Lambda Drive where I live (and which is already serving as a parking lot for the apartments on College Ave. behind Einstein Bagel).

The 6-story mixed use complex is out of place on Del Cerro Blvd. and will transform it into an "urban corridor" similar to the crowded area on College Ave. directly adjacent to SDSU. This project is clearly an expansion of the College area development plan and entirely out of the Navajo Community Plan scope.

I62-2 The demolition and construction phases will be hellacious for nearby residents. As you have noted, the impacts on traffic and both pedestrian and drivers' safety at the intersection will be grave. If the nearby All People's Church project moves forward, these negative impacts will double -- and, when combined, will add over 1,000 vehicles during peak service to the College Ave./Del Cerro Blvd. intersection.

I62-3 Finally, the infrastructure does not currently exist to adequately support these projects. Are we going to suffer a series of major power outages and water/sewer service disruptions for the financial benefit of developers who do not live in this community?

If the Cerro House project is inevitable, it must be reduced in size by 50% or more.

Thank you for the opportunity to share my concerns.

Sharon Hudnall
6373 Lambda Drive
San Diego, CA 92120

I62-1

Refer to Master Response 2 on cumulative impacts.

I62-2

These comments speculate as to the traffic and safety impacts of the project. The church project would add on average 280 daily vehicle trips to the project area; refer to the transportation topical resource regarding trip generation. The estimate on vehicles provided in this comment is speculation and not based on the City's trip generation methodology in the Transportation Study Manual. CEQA Guidelines Section 15145 prohibits speculation in an environmental analysis. No significant transportation impacts are identified in the DEIR.

I62-3

The project would require connections to the nearby utility infrastructure. However, no infrastructure deficiencies would be caused by the project. Comments on the reliability of the grid are speculation and not based on information contained in the DEIR. CEQA Guidelines Section 15145 prohibits speculation in an environmental analysis. Refer to Master Response 2 on cumulative impacts for additional discussion.

Comments

Responses

3.1.3.63 Letter I63: Jeffrey and Michael Hunt

Letter I63

From: Jeffrey Hunt <jeffreyhuntsd@gmail.com>
Sent: Friday, October 7, 2022 4:07 PM
To: DSD EAS <DSDEAS@sandiego.gov>
Subject: [EXTERNAL] All Peoples Church/No 636444

5902 Ridgemoor Dr.
San Diego, California 92120
(858) 525-1010

All Peoples Church/No 636444

An issue that I feel strongly about is the APC's Mega project which they propose to build in the residential community of Del Cerro - District 7.

163-1 The community of Del Cerro is in San Diego's master plan as a single family home residential community and has been that way for the last 65+ years. The APC will be asking the City Council to vote to change the master plan to allow a multilevel commercial Mega project to be built in the residential community of Del Cerro.

163-2 The APC has filed for and been granted a 501© (3) nonprofit status from the U.S. Internal Revenue Service and subsequently acquired 8.5 acres in the community of Del Cerro. The 8.5 acres is located on the east side of College Avenue on the southeast corner of Del Cerro. This 8.5 acres has been zoned residential for over 65 years with property taxes paid to the County of San Diego, which the city receives a portion of those property taxes. The previous property owner Cal Rich development applied for and received permits to build 24, single-family homes. The City Council has previously approved that site for those residential homes which required no change to the City's master plan.

The APC purchased the property in question and plans to file an exemption and once granted an exemption from the state board of equalization, no property taxes would be forthcoming on the property or improvements on the property. All would be removed from the County tax rolls yielding no property tax revenue for the County, City, or State of California. This will result in **additional costs on the city** without additional revenue coming in to cover the costs of providing additional city services to this facility.

163-3 **The purpose of this letter is to ask you to not approve the APCs requirement to change the master plan to then force this massive industrial project onto the residential community of Del Cerro. The APC mega project will drastically alter the character of the community and generate traffic jams. I believe that the traffic impact aspect of the completed Environmental Impact Report by the ACP is misleading. There will be more car trips than projected. More traffic means more congestion and air and noise pollution.**

163-4 The APC project will be better suited in one of San Diego's existing commercial/industrial zones. The existing proposal for 24 residential homes will not impact traffic adversely and will create thousands of dollars in property tax revenues, which will benefit San Diego. In addition to the property taxes, these homes would generate sales taxes as well. Keeping this property zoned to residential will be a better fit, won't create any burdens for the community of Del Cerro and the City of San Diego, and will provide much needed housing during a time of a historical housing shortage.

I63-1

The proposed Community Plan Amendment would add a church symbol to the project site; no change to its residential designation or zoning is proposed because the City does not have a zone classification for church or religious institutions. There are a number of other religious institutions located in the residential land use designation within this community (as illustrated in Figure 24 of the Navajo Community Plan).

I63-2

Economic issues are not required to be analyzed under CEQA, pursuant to CEQA Guidelines Section 15131. The comment does not address the adequacy of the DEIR.

I63-3

General opposition to the project is noted and is addressed in Master Response 6 on that subject. With regard to transportation issues, refer to the Master Response 5 regarding the project's trip generation, Local Mobility Analysis (LMA) and Vehicle Miles Traveled (VMT) Assessment. DEIR Chapter 4 and Section 7.1.2 addressed operational noise and air quality impacts and concluded that project impacts would be less than significant.

I63-4

Refer to the Master Responses 1 and 3 regarding alternative location and residential housing policy.

Comments

Responses

163-5 | We urge the city council to vote no and not to approve the APCs requirements to change the city's master plan and allow a large institution in this community.

Sincerely,

Jeffrey & Michael Hunt
Del Cerro Reservoir
Attachments: APC Letter

163-5

General opposition to the project is addressed in Master Response 6 on that issue.

Comments

Responses

3.1.3.64 Letter I64: Cheryl Irick

Letter I64

From: Cheryl Irick <cirick@me.com>
Sent: Sunday, October 16, 2022 7:01 AM
To: DSD EAS <DSDEAS@sanidiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sanidiego.gov>; CouncilMember Jennifer Campbell <JenniferCampbell@sanidiego.gov>; CouncilMember Stephen Whitburn <StephenWhitburn@sanidiego.gov>; CouncilMember Raul Campillo <RaulCampillo@sanidiego.gov>; CouncilMember Marni von Wilpert <MarnivonWilpert@sanidiego.gov>; Blake, Martha <MBlake@sanidiego.gov>; Holowach, Courtney <CHolowach@sanidiego.gov>; CouncilMember Sean Elo-Rivera <SeanEloRivera@sanidiego.gov>; CouncilMember Vivian Moreno <VivianMoreno@sanidiego.gov>; CouncilMember Monica Montgomery Steppe <mmontgomenysteppe@sanidiego.gov>
Cc: Mike Irick <irick@csusm.edu>
Subject: [EXTERNAL] All Peoples Church

To The City of San Diego:

I64-1 We are twenty-three year residents of Del Cerro and are writing to voice our strong opposition to the project known as the All Peoples Church. We believe the area should be used for housing and was zoned as such.

We find the Environmental Impact Report (EIR) lacking for a number of reasons which we will articulate as briefly as possible.

I64-2 In 8.4.1.1 and 8.4.2.1, the report indicates that the proposed site of the church is not a designated view corridor and that there would be no impact to a designated scenic vista if the project is completed. This is somewhat circular reasoning and suggests that open space, in and of itself, is not a scenic resource. We respectfully disagree.

Del Cerro is a relatively sleepy, peaceful, residential neighborhood. The Community Plan ensures that it will stay that way. The proposed site provides a natural, unobstructed, uncluttered expanse which is consistent with the nature of the community. It gives a sense of distance from highway. That has value to the residents which will be destroyed by using the open space for a large project.

Del Cerro is not highly developed and the residents, by a wide margin, do not want it to be highly developed. Filling a canyon with a 54,476 square foot church and 71,010 square foot parking structure changes the visual quality and neighborhood character in ways which the EIR simply does not address. The fact that the location isn't a designated view corridor does not mean that the location doesn't provide a view.

I64-3 That area is, in some ways, the "front porch" of the community. We are a quiet, somewhat concealed neighborhood, tucked away in central San Diego: one of the most desirable communities in the city. Approving the project will turn the area into something much busier and less desirable than what we know and love as Del Cerro. This is particularly true in light of the proposed construction of a six-story apartment complex just around the corner from the proposed church: another unwanted variation from the community plan.

If our elected representatives are unable or unwilling to protect our neighborhoods as the residents of these communities choose, then these representatives are not serving the people who elected them.

I64-4 The proposed church will also significantly impact the flow of traffic into and out of Del Cerro. Although the proposal is alleged to include only minimal activity at the church during the week, it is inconceivable that the owners will not at some point attempt to use the facility to its full capacity. What is not now proposed can be added later with little to no consideration for the residents, the community, and without meaningful public input. **Therefore, we object to the approval of the project on the grounds that the reasonably foreseeable uses of the structures exceed what is represented and considered by the**

I64-1

Building housing is not one of the project objectives stated in DEIR Section 3.1.1. The 24-unit residential subdivision that was previously approved on site is described in the Reduced Residential Alternative and it would have similar significant impacts as the church/sanctuary project as discussed in DEIR Chapter 8.

I64-2

The DEIR Section 5.5 is correct in stating there are no officially-designated public view corridors identified in the Navajo Community Plan (refer to DEIR Section 5.5.1.4). DEIR Section 5.5.1.1 notes that the property contains native habitat that is currently undeveloped and vacant. DEIR Section 5.5.2.2 and revised Table 5.1-2 both refer to applicable policies in the Community Plan that place value on natural amenities, including open space, in the community. The project site is not designated or zoned as open space. Historically, the site was graded and developed through the construction and/or widening of College Avenue and widening of I-8 in the 1960s.

The analysis contained in the DEIR Section 5.5 applies the City's adopted significance determination thresholds for Visual Effects and Neighborhood Character. Visual quality and neighborhood character changes associated with the project would not result in significant impacts, as discussed in Master Response 4 on that subject.

I64-3

General opposition to the project is noted and is addressed in Master Response 6 on that topic. Refer to Master Response 2 on cumulative impacts.

I64-4

The DEIR Chapter 3 states that the church would contain up to 900 seats with accessory uses (i.e., Sunday school classrooms, offices, and a multipurpose room/gym). This capacity is reflected in the project application. Changes would require an amendment to the permit, triggering a new discretionary review.

Comments

Responses

<p>↑ I64-4 (cont.)</p>	<p>EIR. The willingness of the EIR to accept at face value what the developers have represented demonstrates a failure of the review process and unreasonably favors applicants who wish to deviate from a community plan for their own purposes.</p>
<p>I64-5</p>	<p>We find that the EIR's assessment of traffic impact is sorely lacking in a number of respects. First and foremost, it is inconceivable that the Church does not anticipate growth of its congregation as a result of being in a larger facility. More congregants equals more revenue. The failure of the EIR to anticipate congregation growth is a fatal flaw in the review process and represents a failure to anticipate reasonably foreseeable uses of a project which already deviates from the Community Plan. Accepting the current membership of the Church as its guide, the EIR contains, on its face, an undercounting of potential congregants and a flawed assessment of the project's impact on the community.</p> <p>Traffic on College Avenue and traffic entering and exiting Highway 8 will be significantly impacted by having a light-controlled intersection so close to the entrance and exit ramps. The westbound Highway 8 exit at College Avenue is already difficult to navigate as there is a short lane to allow traffic exiting Highway 8 to merge onto College Avenue. An intersection just off the freeway will not only make it more difficult to merge onto College, but will also result in the backup of traffic on the exit ramp and, potentially Highway 8 itself.</p> <p>Notably, the light controlled intersection would have the unusual distinction of being built <u>simply for the benefit of a single business</u>. That is an irresponsible use of land, public funding, tax dollars, and City investment of time and resources. We are unable to identify any other light controlled intersections in this area which only serve one business.</p>
<p>I64-6</p>	<p>If this project were serving the existing residents of the community, perhaps the analysis would be different. It's possible there would be more community support for it. In fact, The Local Mobility Analysis Report indicates that only about 2% of the congregation of the Church lives in the 92120 zip code. Approval of the project would run counter to the City's Climate Action Plan to reduce greenhouse gas emissions.</p>
<p>I64-7</p>	<p>Additionally, in the midst of the housing crisis the City is attempting to address, it would be an act of pure hypocrisy to take this land, which is approved for a 24-unit housing development, and hand it to a church, instead. There is simply no justification for approval of a project which will have such a great impact on the community but which, because of its religious purpose, <u>will contribute zero revenue in the form of property taxes to support itself and the surrounding community</u>. This is especially relevant given the negligible percentage of Church members which are actually part of this community.</p> <p>The City should decline to approve this project for all the reasons stated above. It's a project which isn't consistent with the community plan, would remake and redefine the entrance to our neighborhood, increase traffic congestion, run counter to the City's Climate Action Plan and attempts to address a housing shortage, and would burden the area with a business serving people who do not live in and contribute to the community.</p> <p>Thank you for your time and consideration on this matter.</p> <p>Respectfully Submitted, Mike Inick Cheryl Inick Residents of Lomond Place</p>

I64-5

The trip generation cited in DEIR Section 7.1.12 and DEIR Appendix K factors in both an increase in staffing as well as growth in its congregation from current levels. Refer to response to comment I33-2 on the same subject. The claims made in this comment are speculative and not supported by the evidence. However, CEQA Guidelines Section 15145 prohibits speculation in an environmental analysis. Refer to Master Response 5 regarding the College Avenue operational changes.

I64-6

An objective of the project is to serve the existing church congregation, which includes residents of City Heights, Mid-Cities, College Area and Del Cerro. The church would not result in significant greenhouse gas (GHG) emissions by relocating to the site as both the existing and proposed locations are within the City. The project would be consistent with the City's Climate Action Plan (CAP) by complying with the various GHG emissions reduction strategies outlined in the project's CAP Consistency Checklist (refer to DEIR Section 7.1.5 and DEIR Appendix B).

I64-7

Refer to the response to comment I64-1. Refer to Master Response 6 on the purpose and need for the project.

Comments

Responses

3.1.3.65 Letter I65: Donna Janzen

Letter I65

From: Donna Janzen
To: SDSU EAS
Subject: [EXTERNAL] All Peoples Church/Mo.636444
Date: Thursday, October 6, 2022 11:17:55 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

I65-1 We strongly oppose this project. The proposed area will be unable to accommodate the traffic created by the project. There is one way in and one way out of the neighborhood which is already congested.

We live on Lambda Drive and constantly have cars unsafely swinging onto our street to change direction as no U-turn is allowed at the intersection of College & Del Cerro Blvd. or at College & Lambda Drive. This dangerous driving will only be exacerbated if this project moves forward. There have been several accidents and we worry that these numbers will only increase as the traffic does.

This is a small community that is already facing challenges with congestion due to the ease of access to the freeway from neighboring communities and SDSU. The last thing we need is 1,000 plus additional cars adding to this existing problem.

It is our deepest hope that this project is relocated to another part of San Diego.

Warm regards,

Donna Janzen, B.A. Gerontology
Eldercare Consultant
Senior Care Referral Specialists

Office: 760-306-7778
Cell: 619-405-4175
Fax: 888-740-4949
Email: donna@SRcareinfo.com
Website: www.SRcareinfo.com

We are a FREE referral agency to assist you, your friends or your clients find senior care and resources 7 days a week. Please do not keep us a secret – We love what we do!

Senior Care Referral Specialists provides education about and referrals to senior housing and care options. Our role is to provide information and options that may best meet the family or client's stated housing or clinical needs, budget and location preferences involved in the search. Facilities or agencies may be included in our service if they are appropriately licensed (as required) by the county and state. We do not operate or have any ownership interests in any of the facilities or agencies to which we refer. In order to provide our services to consumers free of charge, we are reimbursed by the facilities or agencies with whom we have a referral agreement. According to our agreement with these facilities and agencies, they may not charge more based on our referral relationship to our referrals than to those not referred by us, and if such an

I65-1

This comment does not address the adequacy of the DEIR. Refer to Master Responses 5 and 6 regarding general opposition to the project and transportation.

Comments

Responses

When a allegation is made and proven, it is grounds for immediate termination of our referral relationship with the participating facility or agency. We do not endorse or recommend any facility or agency as we believe it is the consumer's responsibility to perform their own due diligence in their selection of the appropriate housing or care choice for the person(s) in need. The facilities and agencies which are referred by Senior Care Referral Specialists are options for consideration only. Families are encouraged to tour, ask questions of each provider, request referrals, and check with the county regarding any licensing issues of their choices to ensure they select the facility or care agency that best meets their needs. Senior Care Referral Specialists can provide general guidelines to help in the selection of a provider and is able to provide the phone number for the Department of Licensing in each county as requested by consumers.

Comments

Responses

3.1.3.66 Letter I66: Vivienne Jarvis and Joe Shapiro

Letter I66

October 16, 2022

City of San Diego
Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

ATT: COURTNEY HOLOWACH, email: DSDEAS@SanDiego.gov.

Re All Peoples Church, Project No. 636444, Draft EIR Council District 7

166-1 Thank you for the opportunity to provide feedback on the Draft Environmental Impact Report (EIR). We are strongly opposed to any building on the above-mentioned canyon located in a primarily family-friendly, single-family housing community. In our current configuration, Del Cerro is facing significant potential environmental challenges as noted in the Draft EIR Report. In essence, there are significant potential traffic pressures to be addressed that can increase challenges with traffic flow, exhaust from traffic and increased noise.

Thousands of students travel these roads and the bridge to/from SDSU daily. The suggested building of a church, construction of a two-level parking lot and meeting additional resource needs of the proposed project is likely to present new/increased environmental demands and challenges. The project is planned for implantation in a small natural canyon that currently assists with water flow and absorption during spells of heavy rain.

The project is planned for implementation in a very awkward location for traffic on College Avenue with additional traffic from church goers and people seeking assistance at the church. This could not only increase traffic congestion but also increase potential traffic accidents and environmental challenges. Ideally, this area should not be built on if we follow what we have learned from many man-made environmentally related disasters that we have been experiencing all over the country & the world. All recommended findings of the Draft EIR must be addressed.

We not only need existing trees but also additional trees and areas for recreation and for wildlife to survive. If the canyon and others like it are made in to park areas that would give families/students a place to congregate while caring for the environment. Del Cerro as well as other areas in San Diego need to increase environmental improvements rather than hinder them.

Sincerely,

Vivienne Jarvis
Joe Shapiro

I66-1

This comment does not address the adequacy of the DEIR but instead outlines its opposition to the project; refer to Master Response 6 regarding general opposition in the FEIR. The transportation concerns expressed in this comment are noted, but do not provide specific feedback on the analysis provided in the DEIR. Refer to the transportation Master Response 5 on vehicle miles traveled (VMT) with regard to the DEIR analysis of transportation impacts. No hydrology impacts are identified in the DEIR due to the construction of a series of drainage improvements and biofiltration basins that would capture and treat runoff from the property. With regard to on-site trees, project construction would result in a net increase of 92 trees (DEIR Section 3.2.7).

Comments

Responses

3.1.3.67 Letter I67: Dave Jones

Letter I67

From: Dave Jones <dave@verantgroup.com>
Sent: Monday, October 17, 2022 4:29 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church: project No. 636444

Dear Courtney Holowach:

167-1 The purpose of this email is to strongly oppose the All Peoples Church project currently proposed for the Navajo community plan area within council district 7. This proposal is extremely short-sided and full of wordsmithing. For example, the project notes that small group activities may occur on Wednesdays, Saturdays, and other days of the week. They do not limit the occupancy of said events and have left the impact to residents very open-ended as a direct result. Moreover, they note that there is no current plan for primary educational school spaces proposed but they fully understand that outreach programs, Sunday and Saturday school programs, etc are not primary education programs but still leave a lasting impression on local residents.

We do not have the freeway access, nor the street access, to properly house this project. Their website alone (<https://allpeopleschurch.org/about/staff/>) mentions programs for babies through fifth grade, freedom ministries, community events, churchwide groups and youth programs. That alone tells you that they plan to be in full swing well beyond Sundays. As such, we need a better plan in place to house 900 people an additional six days a week or this proposal must be denied accordingly. Del Cerro Blvd and Madra alone are integral pathways for all Del Cerro and Allied Gardens residents. As currently presented this Church does nothing but clog the initial artery in and out of our beloved neighborhood.

Thank you so much for your time and please help us direct this project to an area far more appropriate moving forward. Have a great rest of your week!
Sincerely,

--

DAVID JONES

Director of Operations

VERANT GROUP | Bar, Restaurant, Entertainment, Development

5145 Morena Place
San Diego, CA 92110
C 619-347-8255
E dave@verantgroup.com
W verantgroup.com

I67-1

DEIR Chapter 3 states that the church would contain up to 900 seats with accessory uses (i.e., Sunday school classrooms, offices, and a multipurpose room/gym). This capacity is reflected in the project application and would be set as part of the project permits. Changes would require an amendment to the permit, triggering a new discretionary review. Conjecture on potential uses beyond what has been proposed by the applicant are speculative in nature and not reflective of the application, design and site plan submitted to the City. General opposition to the project is addressed in Master Response 6 on that subject.

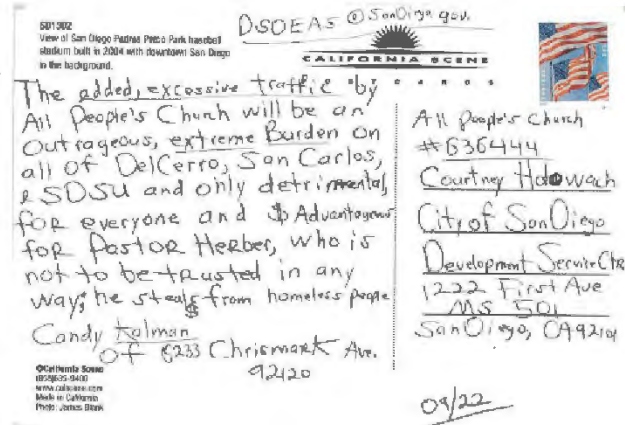
Comments

Responses

3.1.3.68 Letter I68: Candy Kalman: September 22, 2022

Letter I68

I68-1



I68-1

This comment does not address the adequacy of the DEIR but instead outlines its opposition to the project, which is addressed in Master Response 6 on that topic. The transportation concerns expressed in this comment are noted, but do not provide specific feedback on the analysis contained in DEIR Section 7.1.12. Refer to the transportation Master Response 5 regarding vehicle miles traveled (VMT).

Comments

Responses

3.1.3.69 Letter I69: Lia Jones-Karavokiris

Letter I69

From: [Lia Jones-Karavokiris](#)
To: DSD_EAS
Subject: [EXTERNAL] All Peoples Church/No.63644
Date: Thursday, October 6, 2022 11:56:13 AM

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The City of San Diego
Development Services Department

RE: All Peoples Church/No.63644/Navajo Planning Area

The following comments refer to the above-referenced project located 2 blocks from the home I own on Lambda Drive:

I69-1 | After carefully reviewing the environmental impact study, and given my 15-year local commercial real estate development and management career, this project does not appear suitable for the community where I have resided with my family for seven years. In addition to significant environmental impact concerns, the planned use does not reflect the needs or desires of the neighborhood. Strong consideration should be for those who live in the community daily and prefer other uses, especially for such a large, centrally located property situated at the entrance to Del Cerro. I have not heard that anyone approves this project for various reasons. I've also heard from realtors that some families are not buying homes in the neighborhood because they fear this project will be approved. Unfortunately, given my experience, this project may spark the decline of what is one of San Diego's most treasured neighborhoods. Respectfully, please do not approve this project.

Lia Jones-Karavokiris
Masters of Public Administration Candidate 2022
The University of Southern California, Sol Price School of Public Policy

Lucas Karavokiris
United States Marine Corp
VM-22 Pilot

I69-1

This comment does not address the adequacy of the DEIR but instead outlines its opposition to the project. Refer to Master Response 6 on the subject of general project opposition.

Comments

Responses

3.1.3.70 Letter I70: Karen Kawamoto

Letter I70

From: Karen Kawamoto <karen.kawamoto@yahoo.com>
Sent: Friday, October 14, 2022 5:08 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Environmental Impact Report Project #636555; Project Name: All Peoples Church

Development Services Department
City of San Diego

Re: Project Name: All Peoples Church
Project Number: 636444

I70-1 These comments are in response to the draft Environmental Impact Report as submitted by All Peoples Church to amend the Zoning on the property located in Del Cerro. All Peoples Church is requesting to amend the permits that are currently permitted and zoned as RESIDENTIAL. They want it to be amended and be permitted to construct and operate a very large (54,476 sf) church/sanctuary building – NON-RESIDENTIAL. The current zoning is for low-density residential (RS 1-7) which according to the San Diego Municipal code, explicitly does not allow for religious assembly.

I70-2 There are many reasons that this should not be allowed to be changed. The very first and foremost being that the City of San Diego has stated many times that we are in a severe housing crisis. In fact, the Union Tribune dated September 28, 2022, printed the article: **“Housing crisis prompts first joint San Diego county-city meeting in decades”** The article states *“it will be the first time in more than 22 years that the San Diego City Council and the San Diego County Board of Supervisors have held a joint meeting, and only the second such meeting in nearly 32 years. Leaders said Wednesday that such a meeting is necessary because of the severity of the housing crisis and its impact on the economy, homelessness, social equity and general quality of life.”* This alone should be reason enough that the current zoning for up to 24 residential homes **should not be** amended to non-residential properties. It is zoned for housing, not retail, not religious, not anything else! In our dire need for housing, we need to keep zoning that is reserved for housing FOR HOUSING, and not allow it to be amended.

I70-3 Another huge concern is the traffic that a project of this magnitude will create. I live on Lambda Dr., which is one street north of Del Cerro Blvd. There is already a large amount of traffic on College Ave going north and south daily. All day, every day, people try to avoid the intersection of College and Del Cerro Blvd (because of congestion and traffic jams) and drive down our street instead. Our street is quite narrow, so getting in and out of our driveway can be very dangerous as people speed by. If a large church is built, ON COLLEGE AVENUE, that includes a sanctuary, classrooms, offices, gymnasium, multi-purpose room, etc, the traffic on College will be increased immensely. The morning commute, SDSU traffic, afternoon commute, and daily getting on and off the 8 freeway will only get worse and more dangerous if a large religious entity is added to the neighborhood! In addition to All Peoples Church, an apartment building is being planned on Del Cerro Blvd, one block from College Ave. Due to the outrageous allowance that the City of SD (and now, the State of CA) allow high density residences that do not need to have parking for all the residents, the traffic and parking all around our quiet neighborhood of Del Cerro will be strongly affected. FOR THE WORSE.

I70-1

This comment does not accurately reflect the entitlements being sought by the applicant cited in DEIR Chapter 3. The project would not rezone the property, nor is the applicant seeking to amend the residential entitlements approved on site by the prior property owner. Instead, new entitlements are being requested, including a Community Plan Amendment, Planned Development Permit and Site Development Permit, as described in DEIR Chapter 3. The San Diego Municipal Code has provisions to allow projects to propose waivers or exceptions to underlying zoning regulations, provided the permit findings can be made. Refer to Master Response 3 addressing land use policy consistency for the project.

I70-2

The residential housing policy in the region is not a CEQA topic; refer to the Master Response 3 on the subject.

I70-3

Project transportation impacts are analyzed in DEIR Section 7.1.12, as well as DEIR Appendix K. Based on the City’s Transportation Study Manual and staff guidance, a significant traffic impact would not occur. Master Response 5 regarding the College Avenue operational changes addresses the additional delays that could be experienced by area residents with the project traffic, which are not relevant to the CEQA analysis but are provided in support to the Local Mobility Analysis (LMA) as discussed in the transportation Master Response 5 on VMT and LMA. Refer to the Master Response 2 regarding cumulative impacts under CEQA. Parking is not a CEQA topic, and it is speculative to suggest that the parking needs of the church would not be met on site when the project exceeds the City’s parking requirements.

Comments

Responses

170-4	<p>More cars and more traffic equal more dangerous roadways. There is an elementary school located about 2 blocks from College Ave on Del Cerro Blvd, Hearst Elementary. Every morning and afternoon children are walking to school. There are soccer games and softball games played in the back of the school, on Lambda Dr every weekend. Traffic that All Peoples Church will create will make it significantly more dangerous for the children in the neighborhood walking to/from and around the school. The traffic light that exists traveling north on College at Del Cerro Blvd. does not allow a U-Turn option for reasons of safety. So, where are the church members and staff supposed to turn around to get to the freeway? They will turn left or right on Del Cerro Blvd. and drive through the neighborhood causing more traffic and safety issues. The project applicant expects 95% of the congregation to be from OUTSIDE of Del Cerro. The church is <u>not</u> a community church, thus not creating or enhancing any community benefits. That just means they could build their church anywhere in San Diego since virtually all of the members are driving, not walking to the church. There are other areas in San Diego that could easily house the church. One close by – the old Fry's Electronics building is vacant, has a large parking lot already available and is close to freeway access. This is just one site of MANY that are located in and around San Diego. There are several community churches already located in Del Cerro that have many congregants that live in the neighborhood.</p>
170-5	<p>The church has requested to add another traffic light on College Avenue to allow them ingress and egress. Another light on College will just cause more traffic, and for it to be backed up on College Avenue going north and south! The off-ramp from I-8 is too close, and it is a merge from I-8 West that is already dangerous! The city has changed the off ramp several times due to the problems associated with merging onto College Ave. In addition, the traffic every day gets backed up to Del Cerro Blvd for people going over to SDSU or getting on I-8 west off of College Ave. If there is another light mid-way, traffic will back up further and cause more congestion and again, an unsafe roadway.</p>
170-6	<p>All Peoples Church also requests a large parking structure to be built in the space zoned for residential use only. All of these buildings and structures will greatly increase the traffic and because the buildings are trying to be located in a residential neighborhood, all the homes that are on Marne Avenue will be affected greatly. Their privacy will be largely impacted. The noise and pollution from the thousands of congregants and their cars, in addition to any large gatherings outside the buildings will greatly affect the neighbors on Marne Ave. Many of the residents have lived in their homes since they were built in the 1950's and 1960's. Since the property is currently zoned for HOUSING, if homes were built, the impact of cars and people would be minimal. As it should be.</p>
170-7	<p>We purchased land and then built our home on Lambda Dr in 2000. We have raised 3 children here, while they attended the local schools, played sports with the neighborhood kids, and one of our children attended SDSU. We are happy to live in this "bedroom" community that is safe and friendly. When we built our home, we knew of the requirements on the height of our home – not to exceed 30 ft. All Peoples Church wants to change the zoning from residential, in a residential neighborhood, and to be able to increase the height limitations to over 30 feet. The change in zoning should not be allowed. The property is zoned for residential, and has a current plan approved by the City of San Diego to build homes on the property. It should not be amended. Please leave the zoning as residential and do not approve the proposed project number 636444.</p>
	<p>Thank you. Karen Kawamoto 6311 Lambda Dr.</p>

170-4

The DEIR Appendix J, *Local Mobility Analysis (LMA)*, conducted on the project evaluates where improvements are required for site access and to determine whether there are any deficiencies in the local circulation network that surrounds the project site, but not to assess impacts under CEQA. City staff identified the intersection of College Avenue and Del Cerro Boulevard for a systematic safety review. The LMA conducted a review of the accident history for the latest available five years (2015–2019) at the intersection of College Avenue and Del Cerro Boulevard and concluded that no specific pattern of pedestrian-vehicle accidents was found for the study period. Therefore, no safety changes are needed at that location. As noted in that access analysis, the greatest traffic volumes would occur on Sundays when less traffic is using the local roads and no children would be walking to and from school. A signalized intersection would be provided at the main driveway to the site, which does not necessitate a U-turn movement. The circulation movement outlined in this comment may be available but is not a route the majority of church users would take to access the site as shown in the LMA (DEIR Appendix J).

170-5

An objective of the project is to serve the existing church congregation, which includes residents of City Heights, Mid-Cities, College Area and Del Cerro. Alternative locations, such as suggested in this comment, would not achieve the basic of objective of serving the church's current congregation. Refer to Master Response 1 on the alternative location and use subject.

170-6

Installation of the new traffic signal would not result in significant delay, as described in Master Response 5 regarding College Avenue operations, which is no longer a metric used for assessing transportation impacts as outlined in the Master Response 5 on VMT.

170-7

The church use is what would generate new traffic while the parking structure would be an ancillary structure to the church and not produce its own traffic. The structure would exceed the City's parking requirements by 37 spaces to make sure it captures the peak demand associated with holiday services (i.e.,

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Easter and Christmas). All of the potential impacts identified in this comment, including traffic, noise and air quality, are thoroughly addressed in the DEIR and related appendices. DEIR Sections 5.4, 7.1.2, and 7.1.12 conclude that project impacts to these topics would be less than significant, with mitigation only required for construction noise. The project design was developed to minimize its perceived intrusion into the local community by placing the church in the southernmost and lowest elevation of the site, recessing the parking structure into the topography below grade, and providing excessive landscaped screening atop the parking structure and along the eastern property line behind the homes along Marne Avenue. Building housing is not one of the project objectives; however, the prior housing development approved on site was analyzed in DEIR Section 8.4.2 and its impacts are similar to the proposed project.

170-8

The project would not rezone the property because the City does not have a zone classification for church or religious institutions. Residential zoning would remain intact. Refer to Master Response 3 regarding land use policy consistency as it relates to this comment on zoning. Refer to Master Response 6 regarding general opposition to the project.

Comments

Responses

3.1.3.71 Letter I71: Rebecca Kawamoto

Letter I71

From: Karen Kawamoto <kb3kids@cox.net>
Sent: Friday, October 14, 2022 5:09 PM
To: DSD EAS <DSEAS@sandiego.gov>
Subject: [EXTERNAL] Draft EIR for Project No: 636444; Project Name: All Peoples Church

Development Services Department
City of San Diego

Re: Project Name: All Peoples Church
Project Number: 636444

I71-1 These comments are in response to the draft Environmental Impact Report as submitted by All Peoples Church to amend the Zoning on the property located in Del Cerro. All Peoples Church is requesting to amend the permits that are currently permitted and zoned as RESIDENTIAL. They want it to be amended and be permitted to construct and operate a very large (54,476 sf) church/sanctuary building – NON-RESIDENTIAL. The current zoning is for low-density residential (RS 1-7) which according to the San Diego Municipal code, explicitly does not allow for religious assembly.

There are many reasons that this should not be allowed to be changed. The very first and foremost being that the City of San Diego has stated many times that we are in a severe housing crisis. In fact, the Union Tribune dated September 28, 2022, printed the article: **“Housing crisis prompts first joint San Diego county-city meeting in decades”** The article states *“It will be the first time in more than 22 years that the San Diego City Council and the San Diego County Board of Supervisors have held a joint meeting, and only the second such meeting in nearly 32 years. Leaders said Wednesday that such a meeting is necessary because of the severity of the housing crisis and its impact on the economy, homelessness, social equity and general quality of life.”* This alone should be reason enough that the current zoning for up to 24 residential homes **should not be amended** to non-residential properties. It is zoned for housing, not retail, not religious, not anything else! In our dire need for housing, we need to keep zoning that is reserved for housing FOR HOUSING, and not allow it to be amended.

Another huge concern is the traffic that a project of this magnitude will create. I live on Lambda Dr., which is one street north of Del Cerro Blvd. There is already a large amount of traffic on College Ave going north and south daily. All day, every day, people try to avoid the intersection of College and Del Cerro Blvd (because of congestion and traffic jams) and drive down our street instead. Our street is quite narrow, so getting in and out of our driveway can be very dangerous as people speed by. If a large church is built, ON COLLEGE AVENUE, that includes a sanctuary, classrooms, offices, gymnasium, multi-purpose room, etc, the traffic on College will be increased immensely. The morning commute, SDSU traffic, afternoon commute, and daily getting on and off the 8 freeway will only get worse and more dangerous if a large religious entity is added to the neighborhood! In addition to All Peoples Church, an apartment building is being planned on Del Cerro Blvd, one block from College Ave. Due to the outrageous allowance that the City of SD (and now, the State of CA) allow high density residences that do not need to have parking for all the residents, the traffic and parking all around our quiet neighborhood of Del Cerro will be strongly affected. FOR THE WORSE.

More cars and more traffic equal more dangerous roadways. There is an elementary school located about 2 blocks from College Ave on Del Cerro Blvd, Hearst Elementary. Every morning and afternoon children are walking to school. There are soccer games and softball games played in the back of the school, on Lambda Dr every weekend. Traffic that All Peoples Church will create will make it significantly more dangerous for the children in the neighborhood walking to/from and around the school. The traffic light that exists traveling north

I71-1

The project application does not amend the prior property owner’s permits. Instead, new entitlements are being requested, as described in DEIR Chapter 3. With regard to the project’s consistency with City land use policy, refer to DEIR Section 5.1 and Master Response 3 on the subject. The residential housing policy is also addressed in the Master Response 3. Refer to the Master Response 2 on cumulative impacts. Refer to the Master Response 6 on the subject of general project opposition. Refer to the response to comments I70-1 through I70-8 for specific responses to these same comments.

Comments

Responses

I71-1
(cont.)

on College at Del Cerro Blvd. does not allow a U-Turn option for reasons of safety. So, where are the church members and staff supposed to turn around to get to the freeway? They will turn left or right on Del Cerro Blvd. and drive through the neighborhood causing more traffic and safety issues. The project applicant expects 95% of the congregation to be from OUTSIDE of Del Cerro. The church is not a community church, thus not creating or enhancing any community benefits. That just means they could build their church anywhere in San Diego since virtually all of the members are driving, not walking to the church. There are other areas in San Diego that could easily house the church. One close by – the old Fry's Electronics building is vacant, has a large parking lot already available and is close to freeway access. This is just one site of MANY that are located in and around San Diego. There are several community churches already located in Del Cerro that have many congregants that live in the neighborhood.

The church has requested to add another traffic light on College Avenue to allow them ingress and egress. Another light on College will just cause more traffic, and for it to be backed up on College Avenue going north and south! The off-ramp from I-8 is too close, and it is a merge from I-8 West that is already dangerous! The city has changed the off ramp several times due to the problems associated with merging onto College Ave. In addition, the traffic every day gets backed up to Del Cerro Blvd for people going over to SDSU or getting on I-8 west off of College Ave. If there is another light mid-way, traffic will back up further and cause more congestion and again, an unsafe roadway.

All Peoples Church also requests a large parking structure to be built in the space zoned for residential use only. All of these buildings and structures will greatly increase the traffic and because the buildings are trying to be located in a residential neighborhood, all the homes that are on Marne Avenue will be affected greatly. Their privacy will be largely impacted. The noise and pollution from the thousands of congregants and their cars, in addition to any large gatherings outside the buildings will greatly affect the neighbors on Marne Ave. Many of the residents have lived in their homes since they were built in the 1950's and 1960's. Since the property is currently zoned for HOUSING, if homes were built, the impact of cars and people would be minimal. As it should be.

We purchased land and then built our home on Lambda Dr in 2000. We have raised 3 children here, while they attended the local schools, played sports with the neighborhood kids, and one of our children attended SDSU. We are happy to live in this "bedroom" community that is safe and friendly. When we built our home, we knew of the requirements on the height of our home – not to exceed 30 ft. All Peoples Church wants to change the zoning from residential, in a residential neighborhood, and to be able to increase the height limitations to over 30 feet. **The change in zoning should not be allowed.** The property is zoned for residential, and has a current plan approved by the City of San Diego to build homes on the property. It should not be amended. Please leave the zoning as residential and do not approve the proposed project number 636444.

Thank you.
Robert Kawamoto
6311 Lambda Dr.

Comments

Responses

3.1.3.72 Letter I72: Robert Kawamoto

Letter I72

From: Karen Kawamoto <kawamoto5@cox.net>
Sent: Friday, October 14, 2022 5:13 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Draft EIR Report Comments for Project #636444; All Peoples Church

Development Services Department
City of San Diego

Re: Project Name: All Peoples Church
Project Number: 636444

I72-1 These comments are in response to the draft Environmental Impact Report as submitted by All Peoples Church to amend the Zoning on the property located in Del Cerro. All Peoples Church is requesting to amend the permits that are currently permitted and zoned as RESIDENTIAL. They want it to be amended and be permitted to construct and operate a very large (54,476 sf) church/sanctuary building – NON-RESIDENTIAL. The current zoning is for low-density residential (RS 1-7) which according to the San Diego Municipal code, explicitly does not allow for religious assembly.

There are many reasons that this should not be allowed to be changed. The very first and foremost being that the City of San Diego has stated many times that we are in a severe housing crisis. In fact, the Union Tribune dated September 28, 2022, printed the article: **“Housing crisis prompts first joint San Diego county-city meeting in decades”** The article states *“It will be the first time in more than 22 years that the San Diego City Council and the San Diego County Board of Supervisors have held a joint meeting, and only the second such meeting in nearly 32 years. Leaders said Wednesday that such a meeting is necessary because of the severity of the housing crisis and its impact on the economy, homelessness, social equity and general quality of life.”*

This alone should be reason enough that the current zoning for up to 24 residential homes **should not be** amended to non-residential properties. It is zoned for housing, not retail, not religious, not anything else! In our dire need for housing, we need to keep zoning that is reserved for housing FOR HOUSING, and not allow it to be amended.

Another huge concern is the traffic that a project of this magnitude will create. I live on Lambda Dr., which is one street north of Del Cerro Blvd. There is already a large amount of traffic on College Ave going north and south daily. All day, every day, people try to avoid the intersection of College and Del Cerro Blvd (because of congestion and traffic jams) and drive down our street instead. Our street is quite narrow, so getting in and out of our driveway can be very dangerous as people speed by. If a large church is built, ON COLLEGE AVENUE, that includes a sanctuary, classrooms, offices, gymnasium, multi-purpose room,



I72-1

Refer to the response to comments I70-1 through I-70-8 and I71-1 regarding these same comments and issues.

Comments

Responses

172-1
(cont.)

etc, the traffic on College will be increased immensely. The morning commute, SDSU traffic, afternoon commute, and daily getting on and off the 8 freeway will only get worse and more dangerous if a large religious entity is added to the neighborhood! In addition to All Peoples Church, an apartment building is being planned on Del Cerro Blvd, one block from College Ave. Due to the outrageous allowance that the City of SD (and now, the State of CA) allow high density residences that do not need to have parking for all the residents, the traffic and parking all around our quiet neighborhood of Del Cerro will be strongly affected. FOR THE WORSE.

More cars and more traffic equal more dangerous roadways. There is an elementary school located about 2 blocks from College Ave on Del Cerro Blvd, Hearst Elementary. Every morning and afternoon children are walking to school. There are soccer games and softball games played in the back of the school, on Lambda Dr every weekend. Traffic that All Peoples Church will create will make it significantly more dangerous for the children in the neighborhood walking to/from and around the school. The traffic light that exists traveling north on College at Del Cerro Blvd. does not allow a U-Turn option for reasons of safety. So, where are the church members and staff supposed to turn around to get to the freeway? They will turn left or right on Del Cerro Blvd. and drive through the neighborhood causing more traffic and safety issues. The project applicant expects 95% of the congregation to be from OUTSIDE of Del Cerro. The church is not a community church, thus not creating or enhancing any community benefits. That just means they could build their church anywhere in San Diego since virtually all of the members are driving, not walking to the church. There are other areas in San Diego that could easily house the church. One close by – the old Fry's Electronics building is vacant, has a large parking lot already available and is close to freeway access. This is just one site of MANY that are located in and around San Diego. There are several community churches already located in Del Cerro that have many congregants that live in the neighborhood.

All Peoples Church also requests a large parking structure to be built in the space zoned for residential use only. All of these buildings and structures will greatly increase the traffic and because the buildings are trying to be located in a residential neighborhood, all the homes that are on Marne Avenue will be affected greatly. Their privacy will be largely impacted. The noise and pollution from the thousands of congregants and their cars, in addition to any large gatherings outside the buildings will greatly affect the neighbors on Marne Ave. Many of the residents have lived in their homes since they were built in the 1950's and 1960's. Since the property is currently zoned for HOUSING, if homes were built, the impact of cars and people would be minimal. As it should be.

Comments

Responses

172-1
(cont.)

The church has requested to add another traffic light on College Avenue to allow them ingress and egress. Another light on College will just cause more traffic, and for it to be backed up on College Avenue going north and south! The off-ramp from I-8 is too close, and it is a merge from I-8 West that is already dangerous! The city has changed the off ramp several times due to the problems associated with merging onto College Ave. In addition, the traffic every day gets backed up to Del Cerro Blvd for people going over to SDSU or getting on I-8 west off of College Ave. If there is another light mid-way, traffic will back up further and cause more congestion and again, an unsafe roadway.

The change in zoning should not be allowed. The property is zoned for residential, and has a current plan approved by the City of San Diego to build homes on the property. It should not be amended. Please leave the zoning as residential and do not approve the proposed project number 636444.

Thank you.
Rebecca Kawamoto
6311 Lambda Dr.

Comments

Responses

3.1.3.73 Letter I73: David and Claudia Kay

Letter I73

From: cdkavis@cox.net <cdkavis@cox.net>
Sent: Monday, October 17, 2022 3:59 PM
To: DSD EAS <DSD EAS@sanidiego.gov>
Subject: [EXTERNAL] Project 636444

To Whom It May Concern:
Regarding: All Peoples Church
Project: 636444

- I73-1 | Together, we have been residents of Del Cerro since 1986. But David actually moved here first as a child in 1960. We chose to live here after getting married and are fans of the neighborhood and its charming single-family homes, good schools, local market, quiet streets, low crime rate and easy commute to most areas of the county.
We are, however, opposed to the proposed All Peoples Church project in the canyon which abuts College Avenue and Interstate 8.
- I73-2 | Firstly, a project of this size and scope is incompatible with our zoning and the character of the neighborhood that has been here for over 60 years.
- I73-3 | But more importantly, the impact on traffic to College Avenue and the surrounding streets is potentially catastrophic. The documents on file regarding this project are extensive indeed, but it does not appear that increased traffic congestion has been considered or studied.
College Avenue South is already stacked up most weekday mornings with cars going to SDSU and with those stopped at the onramp signal to Interstate 8 West. It is not uncommon for cars to be backed up on this section extending all the way to the traffic light at the corner of Del Cerro Boulevard and College Avenue.
This project proposes adding an intersection and traffic signal on College Avenue for access midway between Del Cerro Boulevard and Interstate 8? Have the ramifications of this been studied at all? One can only imagine.
An extra signal on College will slow the flow of traffic and increase congestion from Del Cerro Boulevard all the way to SDSU at a minimum.
- I73-4 | Cars exiting the proposed All Peoples Church via the new intersection will be able to go left (south on College) or right (north on College). Any cars turning right will a) continue straight on College north b) turn right at Del Cerro Boulevard or c) turn left on Del Cerro Boulevard. No U-Turns are allowed at College Avenue and westbound Del Cerro Boulevard, so this funnels traffic into the neighborhood directly in the path of the existing Temple Emanu-El and Phoebe Hearst Elementary School. Traffic can already be stacked up on this section of Del Cerro Boulevard during school hours. These side streets were never designed to handle large amounts of traffic and adding more is not the answer.
- I73-5 | As far as the notion that traffic increases will be limited to Sundays: There is no guarantee that this will be the case. If the project is built, it will only be a matter of time before a daycare center, preschool, kindergarten, classrooms, etc. etc. are added to the facility and access will be daily.
- I73-6 | We kindly ask that this project and all of its impacts on the existing neighborhood be reconsidered. In our opinion it would not impact College Avenue and the existing side streets in a positive way.

David and Claudia Kay
Del Cerro Boulevard
619-504-2214

I73-1

This comment does not address the adequacy of the DEIR. Refer to Master Response 6 regarding general opposition to the project.

I73-2

This comment does not address the adequacy of the DEIR. Refer to Master Responses 3 and 4 regarding land use policy consistency and neighborhood character.

I73-3

With regard to the project's traffic-related impacts, the DEIR studied the transportation impacts of the project in Section 7.1.12 and determined that the impacts would be less than significant. Refer to the transportation Master Response 5 on trip generation rate and College Avenue operational changes.

I73-4

This comment does not address the adequacy of the DEIR. However, a Local Mobility Analysis (LMA) was conducted for the project to identify any on- or off-site infrastructure improvements in the project vicinity that may be triggered with the development of the project, analyze site access and circulation and evaluate the local multimodal network available to serve the project. With regard to trip generation, refer to the transportation Master Response 5 on that matter. According to the analysis in the LMA, with the proposed traffic signal, median changes, sidewalk, and bike lane improvements in place, the project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system and no additional off-site improvements would be required, as stated in the transportation Master Response 5 regarding the LMA. No improvements to the circulation system in the vicinity of Temple Emanu-El and Hearst Elementary School were required as part of the LMA access analysis.

I73-5

The project application does not include land uses such as daycare center, preschool or kindergarten classes. Future changes to the project would require an

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amendment to the existing permit and would be subject to CEQA review to address the potential for impacts.

173-6

This comment does not address the adequacy of the DEIR. Refer to Master Response 6 regarding general opposition to the project.

Comments

Responses

3.1.3.74 Letter I74: Allyson Kelley: September 27, 2022

Letter I74

[EXTERNAL] All Peoples Church, 636444

Retention: Inbox

allyaabram@yahoo.com
To: DSD EAS

Tue 9/27/2022 9:25 PM

Hello,

I74-1 In regards to the All People Church proposed. The location is a small intersection which supports the local traffic with two schools and the university with in a mile.

The exit and entrance ramps from the 8 are often very backed up as there is a volume of traffic already creating issues from SDSU students, as well as large events hosted at on campus. The exit and entrance ramps east and west are small and unable to move the cars with the current demands.

The location of the property will require U- turns into the neighborhood and/or the one modest intersection and an already congested local residential area.

Finally, this is not what the residents of this community were promised. A MEGA church in name itself represents the volume expected which is misaligned to the location and resources (gas stations, parking at Windmill Farms, small restaurants etc. This would significantly impact the quality of life of those who live and pay the taxes in this area. It will completely change the functionality and distress the streets and resources in this area.

Thank you,
Allyson Kelley

Reply Forward

about:blank 1/1

I74-1

This comment does not address the adequacy of the DEIR. The DEIR addresses the project's effects on traffic in Section 7.1.12; based on the VMT analysis provided in that section, no significant impacts to the College Avenue/Del Cerro Boulevard intersection would occur. Refer to Master Response 5 on transportation, including trip generation rate and College Avenue operational changes.

Comments

Responses

3.1.3.75 Letter I75: Danielle Kerr

Letter I75

From: Danielle Kerr <ddmokerr@gmail.com>
Sent: Monday, October 17, 2022 4:49 PM
To: DSD EAS <DSD EAS@san diego.gov>
Subject: [EXTERNAL] All people church Del Cerro

I75-1 I oppose this church in our community!!! Voting/signing NO on All People's Church!
Del Cerro home owner,
Danielle Kerr

I75-1

This comment does not address the adequacy of the DEIR. Refer to Master Response 6 regarding general opposition to the project.

Comments

Responses

3.1.3.76 Letter I76: Anne and Mohsin Khan

Letter I76

From: Anne Khan <annekhan@gmail.com>
Sent: Tuesday, October 11, 2022 12:43 PM
To: DSD EAS <DSD EAS@san-diego.gov>
Subject: [EXTERNAL] All Peoples Church/No. 636444

SCH No. 2021100394
Community Plan Area: Navajo
Council District 7

I76-1 | We have lived in this community since 2018. We have 3 grandchildren in the neighborhood and enjoy the walkability to the area Bagel Shop, Grocery store and Park. We feel the addition of this church will increase the traffic and therefore the safety of this neighborhood substantially. It is already so busy at the light on Del Cerro and college as it is and this will only magnify the risk of accidents with cars and children in the neighborhood.

Please take into consideration the magnitude of unwanted disturbance that will result from the adding of this structure.

Anne and Mohsin Khan
6047 Iomond Drive
San Diego
Ca 92120

I76-1

Refer to the transportation Master Response 5 regarding the Local Mobility Analysis (LMA), which addresses pedestrian safety in the project area.

Comments

Responses

3.1.3.77 Letter I77: Michael Kinnamon

Letter I77

From: Michael Kinnamon <mk.kinnamon@gmail.com>
Sent: Wednesday, October 12, 2022 4:35 PM
To: DSD EAS <DSDDEAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church (project 636440)

Courtney Holowach
City of San Diego Development Services Center

Dear Ms. Holowach,

This letter comes with appreciation for the work of the Development Services Center.

I77-1 I write now to express my strong opposition to the proposed construction of a megachurch facility near the intersection of College Avenue and Interstate 8. This project, if allowed to proceed, would add a sixth traffic signal to a half-mile stretch of College, compounding existing concerns over congestion and safety. Proponents suggest that traffic will be a problem only on Sundays; but, of course, church activities are by no means limited to one day a week. What traffic study could possibly determine that this is appropriate?

I77-2 I have other objections, including putting two massive structures (a 54,000 square foot sanctuary and a 71,000 square foot parking garage) on a sliver of environmentally sensitive land, and imposing buildings that are completely inconsistent with the surrounding residential neighborhood. You have no doubt heard similar concerns from other residents of Del Cerro, since nearly everyone with whom I have spoken about this project is against it.

I77-3 What I want to stress in this letter is that opposition to this project, contrary to what some proponents have claimed, is not "anti-Christian" or "anti-church." I, for example, am an ordained minister in the Christian Church (Disciples of Christ), now retired after thirty years as a professor in Christian seminaries. My career also included a term as head of the National Council of Churches. As this suggests, I am a big advocate of houses of worship and appreciate what they potentially contribute to a community. What I, and many others in this neighborhood, object to is building a very large church in this very troubling location. All People's Church does not have roots in Del Cerro that require it to be located here, and there are any number of less problematic sites in San Diego for such a facility.

Warm regards,

Michael Kinnamon

Rev. Michael Kinnamon, Ph.D.
5840 Del Cerro Blvd.
San Diego 92120

I77-1

Refer to Master Response 6 regarding general opposition to the project. With regard to the project's traffic-related impacts, pursuant to CEQA, the DEIR used a vehicle miles traveled (VMT) metric for assessing the project's potential for significant transportation impacts. The VMT analysis presented in DEIR Section 7.1.12 determined there would be no significant impacts both during weekday and Sunday operations. Refer to 4 Master Response 5 on VMT, trip generation rate and College Avenue operational changes.

I77-2

Refer to Master Response 4 regarding neighborhood character and associated visual impacts within the Del Cerro community, which were determined to be less than significant in DEIR Section 5.5. Impacts to sensitive biological resources were determined to be less than significant with mitigation incorporated into the project; refer to DEIR Section 5.2.

I77-3

This comment does not address the adequacy of the DEIR. Refer to 1 Master Response 6 regarding general opposition to the project.

Comments

Responses

3.1.3.78 Letter I78: Derek and Lily Kinninger

Letter I78

- All PEOPLES
CHURCH #
636444



Mi-Pad

DEAR Ms. HOLLOWACH -

I78-1

AS A 29 YEAR RESIDENT OF
DEL CERRO I WANT YOU TO KNOW
SOME OF MY CONCERNS FOR THE
PROPOSED PROJECT. AS OUR CITY
UNFORTUNATELY CONTINUES TO GROW SO
TO DOES OUR TRAFFIC. COLLEGE AVE
S THE MAJOR ARTERY NOT ONLY
FOR DEL CERRO BUT ALSO FOR ALLIED
GARDENS, SAN CARLOS AND THE SAN
DIEGO STATE AREA. HAVING PERSONS
AND VEHICLES ACCESS THE PROPOSED
FACILITY WOULD CREATE A HUGE TRAFFIC
PROBLEM FOR A ALREADY CON-
GESTED ROAD. THERE IS ALREADY AN

Megaro Hotel, Belgrove Street, St. Pancras, London WC1H 9AB
+44 (0)20 7845 2222 reservations@hotelmegaro.co.uk www.hotelmegaro.co.uk

I78-1

With regard to the project's traffic-related impacts, refer to Master Response 5 on transportation, including trip generation rate and College Avenue operational changes.

Comments

Responses

178-1
(cont.)

ISSUE BECAUSE OF THE CLOSE PROX-
IMITY TO HIGHWAY 8. THIS WILL
POTENTIALLY CAUSE A RIPPLE AFFECT
FOR TRAFFIC EXITING THE FREEWAY
BUT ALSO FOR THOSE USING 1011 EBE
VE. THE TRAFFIC FOR SAN DIEGO STATE
IS ALREADY AN ISSUE FOR OUR
COMMUNITY. DEL CERRO HAS ITS OWN

178-2

FLAVOR AND WE BOUGHT OUR HOME
BASED ON WHAT WE SAW EXISTING
IN OUR COMMUNITY. PLEASE ALLOW
US TO REMAIN AS WE HAVE FOR
THE PAST 60 YEARS. WE DO NOT
NEED MORE PEOPLE, TRAFFIC AND
NOISE IMPACTING US ANYMORE
THAN ALREADY EXISTS. I LOOK
FORWARD TO YOUR RESPONSE.

SINCERELY

DEREK & LILY KINNINGER

178-2

Refer to Master Responses 4 and 6 regarding general opposition to the project and neighborhood character. The transportation and noise impacts of the project were determined in the DEIR to be less than significant; refer to DEIR Sections 7.1.12 and 5.4, respectively.

Comments

Responses

3.1.3.79 Letter I79: George Kirazian

Letter I79

From: George Kirazian <kiraziang@gmail.com>
Sent: Friday, October 7, 2022 12:28 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church/No.636444

Dear Environmental Division:

I79-1 | This letter concerns the Draft Environmental Impact Report, SAP# 24008189, Project # 636444, SCH# 2021100394.

As Del Cerro residents for 55 years, we are against the construction and development of the All Peoples Church project.

We certainly have no objection to this church group. We know nothing about them, but are certain they are a respectable church.

Our objection is that we don't think the Site on which they are planning to build is appropriate for the construction of a Church.

I79-2 | That location is a highly trafficked one. Interstate 8 and College is constantly subjected to a great number of cars, trucks, and other vehicles. As a result, the area and its atmosphere are congested enough.

The traffic of parishioners attending on Sundays, and throughout the week because of church meetings, would only worsen the congestion, and pose a threat to the neighborhood Seniors, Adults, and school age children who walk and socialize daily in the area.

I79-3 | We suggest that the Site be developed as a Park to accommodate natural habitats and to improve the environment for nearby residents.

Thank you very much.

Respectfully,
Mr. and Mrs. George Kirazian
5750 Malvern Ct. SD 92120

I79-1

This comment does not address the adequacy of the DEIR. Refer to Master Response 6 regarding general opposition to the project.

I79-2

With regard to the project's traffic-related impacts, refer to Master Response 5 on transportation, including trip generation rate and the non-CEQA topic of College Avenue operational changes. The transportation impacts of the project were determined in the DEIR Section 7.1.12 to be less than significant.

I79-3

This comment does not address the adequacy of the DEIR. Use of the site as a park would not achieve the applicant's basic objectives; refer to Master Response 1 which addresses alternative land uses for the site.

Comments

Responses

3.1.3.80 Letter I80: Sarah Knoepfli: October 11, 1022

Letter I80

From: Sarah Knoepfli <sarahk@sdpmc.com>
Sent: Tuesday, October 11, 2022 4:09 PM
To: DSD EAS <DSEAS@sandiego.gov>
Subject: [EXTERNAL] Project 636444 / All Peoples Church Comments from Concerned Community

To Whom it concerns:
Development Services
(Courtney Holowach / Raynardo Abalos)

- I80-1 | As a very concerned neighbor I have taken the time to review the Draft Environmental Impact report so that I could review the large zoning request being asked by a private church facility in an already overcrowded area.
I am very concerned that due to the private project already requesting a large rezone task during a time when the city & government have stressed housing needs they are now asking even more considerations layed out in Table 3-1 / PG 3-2
- I80-2 | The development deviations far exceed what the city has laid out for the community planning as it stands.
1. A height request in specific areas almost doubles regulation
2. A wall height more than triple the current regulation
3. A setback varient 6 times less than city required
Development requirements to host over 1000 people & probably 500+ cars on the streets that funnel to neighborhood homes, schools & parks is going to be a nightmare for local residents.
- I80-3 | 3.4.5 - Easement Vacations
Utility easements have been in place to service the community laid out above it for years, could they really allow all the vacations. Will this affect the homes and our services if these requests are provided to allow them to build?
- I80-4 | Figure 3-8
This shows 12 churches or areas of warships and it cuts off at La Mesa which also is home to another 7 more just north of the 8 freeway.
The rezoning request is not supported by a shortage or need in the community. The fact that it will create massive congestion and traffic is not outweighed by the proposed positive additions the All Peoples Church feels it will provide.
- I80-5 | I, Sarah Knoepfli, strongly oppose the rezoning request & build of All Peoples Church. I do not believe it adds value to the community but takes away from what is currently there already and what is needed in today's climate.

--
Sincerely,

Sarah Knoepfli
sarahk@sdpmc.com
619-261-0999
Del Cero Resident
Hillgrove Dr

I80-1

As noted in DEIR Section 5.1, while the project would require a Community Plan Amendment to add "church" use to the Other Community Facilities map in the Navajo Community Plan, the project would not alter the residential zoning or land use designation of the site. The City does not have a zone classification for church or religious institutions. Master Response 3 regarding land use policy consistency also addresses this issue. Refer to Master Response 6 regarding general opposition to the project and other non-CEQA related responses.

I80-2

The San Diego Municipal Code (SDMC) has provisions to allow projects to propose deviations, such as those noted in this comment, if the permit findings can be made. As noted in DEIR Chapter 3, *Project Description*, the project would contain 900 seats and park up to 356 vehicles on the project site. The numbers cited in this comment are inflated and do not reflect the project's features outlined in DEIR Chapter 3.

I80-3

This comment expresses concern regarding the proposed vacating of existing easements. As described in the DEIR Chapter 3, *Project Description*, numerous existing easements would be vacated by the TM. Public utility and service impacts to the nearby community would not occur based on utility improvements proposed by the project. Refer to DEIR Section 7.1.13 for the utilities and service systems analysis which concluded that impacts would be less than significant.

I80-4

These comments are noted but do not address the adequacy or content of the DEIR. General opposition to the project is noted and is addressed in Master Response 6 on that issue in the FEIR. Need for the project is also addressed in Master Response 6.

Comments

Responses

180-5

Comment does not address the adequacy or content of the DEIR but rather expresses general opposition to the project, which is addressed in Master Response 6 on that issue.

Comments

Responses

3.1.3.81 Letter I81: Daniel Kroeger

Letter I81

From: D Kroeger <dkroeger@gmail.com>
Sent: Sunday, October 16, 2022 9:29 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church/No. 636444

To whom it may concern,

I81-1 | As a long time Del Cerro homeowner I am contacting you to voice my concerns over this proposed project. I brave the current congestion along College Ave and Del Cerro Blvd each morning and can't imagine adding a development that would need a multi-story garage. As a son of a minister I grew up in the church and am very skeptical of the proposal that implies a very light use during the week. Each church strives to use their facilities to help in their ministry and this occurs all week and will most definitely bring a lot of additional visiting traffic that is too much for our small community to handle. Also, we have been under the impression that this area was zoned for housing and was planned for much needed homes that could help with the shortages that are making the cost of living so high in this the greatest city around.

Please vote against this project and help Del Cerro.

Thank you for your time and please feel free to contact me if you have any questions and need clarification on this matter.

Daniel Kroeger
(760) 468-3850

I81-1

As described in the DEIR Section 5.5 and Master Response 4 on neighborhood character, the parking structure would be constructed entirely below grade of College Avenue. With the proposed entitlements in place, the project would be consistent with City land use policy, as discussed in DEIR Section 5.1 and in Master Response 3 on that issue. Additionally, the housing crisis is not an environmental impact, as discussed in Master Response 3 on residential housing policy. General opposition to the project is not a CEQA issue and is addressed in Master Response 6 in the FEIR.

Comments

Responses

3.1.3.82 Letter I82: Erik Larson

Letter I82

From: Erik The Y8200
To: DSU EAS
Subject: EXTERNAL PROJECT: 636444 All Peoples Church
Date: Tuesday, October 4, 2022 12:05:43 PM

I82-1 | As a resident and homeowner in Del Cerro, I oppose the construction of the All Peoples Church Project for these reasons:

1. The draft Environmental Impact Report determined the proposed project would result in significant environmental effects in the following areas: Biological resources, Historical Resources, Noise, Tribal Cultural Resources
- I82-2 | 2. This Church practices (Gay) Conversion Therapy/Reparative Therapy and is a Violation of Human Rights for the LGBTQ+ community.

Sincerely,
Erik R. Larson
5983 Del Cerro Blvd
San Diego CA 92120

www.houndsavers.org

Adoptable greyhounds.....
<http://www.petfinder.com/shelterSearch/shelterSearch.cgi?animal=&breed=&age=&size=&specialNeeds=&deceasedPets=&children=&status=&id=&internal=&contact=&name=&shelterid=CA629&sort=&preview=1>

I82-1

DEIR Sections 5.2, 5.3, 5.4, and 5.6 identified significant impacts to Biological Resources, Historical Resources, Noise and Tribal Cultural Resources as stated in the comment. Feasible mitigation measures were identified in the DEIR which, when implemented, would reduce these impacts to a level below significance.

I82-2

This comment does not address the adequacy of the DEIR. Refer to Master Response 6 regarding general opposition to the project.

Comments

Responses

3.1.3.83 Letter I83: Trish Larson

Letter I83

From: Dr. Trish Larson <dr.trishlarson@gmail.com>
Sent: Tuesday, October 4, 2022 12:08 PM
To: DSD EAS <DSD EAS@sanidiego.gov>
Subject: [EXTERNAL] Project: 636444 All Peoples Church

I83-1 | As a resident and homeowner in Del Cerro, I oppose the construction of the All Peoples Church Project for these reasons:

1. The draft Environmental Impact Report determined the proposed project would result in significant environmental effects in the following areas: Biological resources, Historical Resources, Noise, Tribal Cultural Resources
2. This Church practices (Gay) Conversion Therapy/Reparative Therapy and is a Violation of Human Rights for the LGBTQ+ community.

Sincerely,
Dr. Trish Larson
5983 Del Cerro Blvd
San Diego CA 92120

I83-1

Refer to responses to comments I82-1 and I-82-2, which discuss the same comments as this letter.

Comments

Responses

3.1.3.84 Letter I84: Bob and Jane LeRibeus

Letter I84

From: Bob & Jane <Leribeusdds@cox.net>
Sent: Monday, October 10, 2022 11:23 AM
To: DSD EAS <DSDDEAS@sanidiego.gov>
Subject: [EXTERNAL] Citizens Concerns

Reference:
Project Name: All Peoples Church
Project No.: 636444

Dear Sir or Madam

I84-1 | My wife and I are concerned about the crowding and congestion that is inevitable with the project the size of the proposed All Peoples Church. Advocates say that Sunday services are the only potential problem but traffic lights will resolve that issue but I strongly disagree. The vicinity of the proposed location is already a traffic bottleneck. We already have concerns about a 6 story apartment building approved that is going to be built within a few hundred yards of the proposed church and what effect that will have on crowding and traffic. It has been brought to my attention that the church plans to have programs for marriage counseling, unwed mothers, drug addiction, and homelessness. These people obviously need help, but as you must know, these people are often accompanied by questionable and unsavory characters. With an elementary school (Phoebe Hearst) only three blocks away I worry that the children could be put in a precarious position. With the potential of child endangerment, traffic and human congestion, and the destruction of an area originally zoned for single family residency, I strongly urge you to deny the All Peoples Church application and let them locate in an area more suitable for their objectives

Sincerely,
Dr. and Mrs Robert J. LeRibeus

Sent from my iPad

I84-1

This comment does not address the adequacy of the DEIR. Refer to Master Response 6 regarding general opposition to the project.

Comments

Responses

3.1.3.85 Letter I85: Phillippe and Natascha Lesage

Letter I85

From: Phillippe Lesage
To: DSO EAS
Subject: EXTERNAL Input to EIR - project All Peoples Church - 636444
Date: Monday, October 3, 2022 8:24:20 PM
Attachments: f5947f62a87129a589775eb0fca30c67.mov

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Regarding Project: All Peoples Church
Project No 636444

To Courtney Holowach, city of San Diego Development Service Center.

I am a resident at 5631 Madra avenue in del Cerro (92120).

I am writing this email in regards to the Environmental Impact report for project name: All peoples Church, project no 636444.

I85-1 I want to make aware that in terms of wildlife, bobcat exist and live in the area, and after reading the document, it seems the Environmental Impact Report isn't adequately assessing the impacts to loss of bobcat habitat.

Therefore I'd like to ask the Environmental Impact Report team to address for comprehensiveness. It's possible that the biologists who surveyed the site may not have noticed evidence of bobcat and therefore may not have addressed it in their EIR analysis.

Since I live 1 block away from the proposed project and I have seen a bobcat recently many times on my property, I have attached a video footage of a bobcat in my backyard from Friday September 30th, 2022 as a proof that bobcat live in this area.

Feel free to contact us if you need more information. I am looking forward to hearing from you what step you will be taking to ensure that you assess the impact of the All Peoples Church project to the bobcat habitat in del Cerro.

Phillippe & Natascha Lesage
5631 Madra avenue
San Diego, CA 92120
Phone: 619.296.9082
Email: lesagetwins@gmail.com

I85-1

DEIR Section 5.2 includes a list of sensitive animal species that are considered federal or State rare, threatened, or endangered MSCP-Covered Species. It also includes species on CDFW's Special Animals List. Bobcats are not located on any of these sensitive species lists and are therefore considered a common species with a stable population. Although bobcats may occur in the project area, their presence on site was not observed by the field biologists conducting surveys of the property in accordance with procedures outlined in the City Biology Guidelines. Only one sensitive animal species, orange throated whiptail, was observed onsite during field investigations conducted for the project. The biological resources analysis provided in DEIR Section 5.2 states that there are no wildlife movement corridors or habitat linkages on, or adjacent to, the project site; therefore, project impacts would be less than significant. Project impacts to the sensitive habitat that occurs on site would be mitigated in accordance with the guidelines contained in the City Biology Guidelines. The DEIR adequately addresses project impacts to biological resources, including wildlife species such as the bobcat pictured in this comment.

Comments

Responses



Comments

Responses

3.1.3.86 Letter I86: Aaron Levine

Letter I86

From: Aaron Levine <aaron.levine4@gmail.com>
Sent: Sunday, October 16, 2022 1:07 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church; project #636444

Dear City of San Diego -

- I86-1 As residents of Del Cerro and neighbor of the proposed project, we have considerable concerns over the project and scope. The proposed project is too large for our small community and we do not believe the proposed use case of the facility is accurate based on current activities and programs currently run out All Peoples Church as seen here on their events page <https://allpeoples.churchcenter.com/unproxy/registrations> and here with their smaller group events <https://allpeoples.churchcenter.com/groups>. In addition on various YouTube sermons and interviews the church leader is quoted that he intends to recruit college students from SDSU nearby. Their intentions our beyond their written proposals and lack of transparency from the start. My home is within a few streets from the location and since the purchase of the parcel (that was zoned for housing) there has been no community engagement. The proposed parking structure (no other place of worship in the community has a parking structure) is troubling as they're preparing for larger crowds than they propose. Again, this is concerning that they're entering a community - without concern and if they're granted permission to build will continue their lack of respect for residents. For the traffic impact, Hearst Elementary is over capacity and Patrick Henry has well over 2500 students - when you consider SDSU and their expansion, concert and event schedule already being managed, the impact to traffic from All peoples Church proposed daycare / school - which also won't just be on Sundays - is not reasonable. Adding the traffic light in their proposed location will only impact residents north of the freeway and the flow above Del Cerro blvd and the light will disrupt not only the lovely median with trees but the Del Cerro community sign. We can't even get college blvd and Del Cerro blvd paved - now they want to add 900 cars to the traffic?
- I86-2
- I86-3 I'm addition, since purchasing the lot, All Peoples Church performed no up keep or fire safety clearance until members of the community complained to the city - if they want to join a community and believe in service, why not start with clearing out the lot you purchased.... Again do they really want to join the community or use it.
- I86-4 Please do not let this project continue - keep it for homes (we've all see. The homes report in the county) keep this community a community and the appropriate size. Look at the scope of the project and realize All Peoples Church leadership has bigger plans than what they have shared. If they didn't, why is the facility significantly larger than their current member size, why need a parking garage? Will they sell parking during SDSU events to raise money - where currently parking is prohibited for events on this side of the freeway to protect the community! Would their vocal leader make the comments he's made? Embracing a community means conversation, mediation and engagement. There has been none - no written notice, no forum, nothing. Just lobbying, deflection and insistence to push their way into a community and location that isn't zoned for their building. Please do not let this mega church be built in our community - it does not benefit the community and will not benefit us. There's enough places of worship in the community that already put the work in and have been embraced by the community.

Thank you
Aaron and Jessica Levine
Del Cerro Residents
6487 Elmhurst dr.

I86-1

The DEIR assesses the project that is described in the application to the City. Conjecture on potential future uses beyond what has been proposed by the applicant are speculative in nature and not reflective of the application, design and site plan submitted to the City and the project described and analyzed in the DEIR.

I86-2

The DEIR addresses the project's effects on transportation in Section 7.1.12: transportation impacts are presumed to be less than significant. Refer to Master Response 5 regarding the Vehicle Miles Traveled (VMT) Assessment and the Local Mobility Analysis (LMA).

I86-3

This comment does not address the adequacy of the DEIR. Refer to Master Response 6 regarding general opposition to the project.

I86-4

This comment does not contain specific comments on the content or adequacy of the DEIR. Building housing is not one of the applicant's project objectives, as stated in DEIR Chapter 3, *Project Description*. Refer to Master Response 6 that address non-CEQA issues such as general opposition to the project, and the need for the project.

Comments

Responses

3.1.3.87 Letter I87: Lacey Levitt

Letter I87

From: [Lacey Levitt](#)
To: [DSU-EAS](#)
Subject: [EXTERNAL] Project no. 636444
Date: Tuesday, October 4, 2022 8:57:30 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Re: Project no. 636444

I87-1 | As a Del Cerro homeowner, I adamantly oppose the construction of a mega church in our residential neighborhood. This structure would disrupt the quiet enjoyment of residents which is among the neighborhood's very greatest assets. All Peoples Church is not an appropriate project for this area; it should be constructed in a busy and bustling area of the city.

Sincerely,

Lacey Levitt, Ph.D.
6034 Lancaster Drive
San Diego, CA 92120

I87-1

This comment does not contain specific comments on the adequacy of the DEIR. Refer to Master Response 6 regarding general opposition to the project.

Comments

Responses

3.1.3.88 Letter I88: Zita Liebermensch

Letter I88

From: Zita Liebermensch <4zital@gmail.com>
Sent: Tuesday, October 11, 2022 11:34 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] All People Church/No 636-444

Hi-

As a resident of the Del Cerro community, I am responding to your NOTICE OF AVAILABILITY DRAFT ENVIRONMENTAL IMPACT REPORT regarding the subject project.

I88-1 | My utmost concern would be the major impact this will have on the **disruption of the flow of traffic** from College Ave north to the Church.
That road is a two-lane road from SD State University and the Highway 8 College Ave off ramp with minimum leeway for a right turn onto Del Cerro Blvd.
Currently that road is backed-up during peak hours and constructing the Church on that proposed site would be exceedingly impactful to the Del Cerro Community

Thank you,
Zita Liebermensch

I88-1

As discussed in the transportation analysis, DEIR Section 7.1.12, the additional traffic delay created in the project area would not be substantial. Refer to the transportation Master Response 5 that addresses the non-CEQA topic of College Avenue operational changes.

Comments

Responses

3.1.3.89 Letter I89: Michael Livingston (Save Del Cerro)

Letter I89

From: Michael Livingston <liv4mic@att.net>
Sent: Monday, October 17, 2022 2:19 PM
To: DSD EAS <DSD EAS@sandiego.gov>
Subject: [EXTERNAL] All Peoples Church/No. 636444 Draft EIR response

October 16, 2022

City of San Diego Development Services Center
ATTN: Courtney Holowach
1702 First Avenue
San Diego, CA 92101
DSD EAS@sandiego.gov

I89-1

Please accept the attached response and exhibits from Save Del Cerro. Thank you.



I89-1

Comment noted, the attached exhibit has been received from other commenters and is reflective of the project's trip distribution to/from the church site, as presented by the project's traffic engineer in the Local Mobility Analysis (LMA) contained in DEIR Appendix J. Refer to response to comment I20-11 and Master Response 5 regarding the LMA.

Comments

Responses

October 16, 2022

City of San Diego Development Services Center

ATTN: Courtney Holowach

1222 First Avenue

San Diego, CA 92101

DSDFAS@SanDiego.gov

RE: Comments on Draft Environmental Impact Report

Project Name: All Peoples Church

Project #636444

189-2 | The project site is governed by the Navajo Community Plan, adopted by the San Diego City Council in 1982, and is designated for Single Family residential use as shown in Figure 4, the Community Plan's land use map. (see attached)

The project site is within San Diego's RS-1-7 Zone which is intended for residential uses. The City of San Diego approved a 24 home subdivision in December of 2017 via a process 5 City Council vote in compliance with both the Land Use and Zoning Code regulations. The current project applicant has twice requested an Extension of Time (EOT) for this previously entitled housing project.

189-3 | The proposed project is a Religious Assembly Use which is regulated by the Commercial Zoning Code and per the City of San Diego Municipal Code, is expressly NOT ALLOWED in the RS-1-7 Zone. Approving the project in residential base zoning opens the City up to litigation. The municipal code is written for sound reasons as traffic, safety and noise impacts are significant and often not able to be mitigated. In addition, Religious Assembly Uses often contain separate business activities and social programs that are not compatible with residential use. The Rock Church in Pt Loma is an example of this incompatibility. Due to San Diego Municipal Code, a zoning change would be required in the general plan that allows for religious assembly.

189-4 | The method the Applicant has chosen to advance their Project Objectives is an attempt to subvert all of the Navajo Community Plan Objectives by sleight of hand. Their claim that Figure 24 of the plan (see attached) allows them to meet the Land Use requirements of the Community Plan and thereby sidestep the Commercial Zoning Code without changing any of the language of the Plan through public hearings is absurd. Figure 24 is a snapshot in time from 1982 of some facilities in the area, not a springboard to leap over today's publicly vetted and approved regulations. To be clear, the Community Plan does not adequately incorporate or consider appropriate siting of religious institutions and should be revised to do just that.

189-2

As stated in DEIR Section 3.4, approval of the Community Plan Amendment would allow the church to be permitted in the single-family residential land use designation similar to other religious institutions in the Navajo Community Plan area. The Community Plan does not have to contain policies for siting religious institutions for churches to be allowed within the community. Approval of the proposed Planned Development Permit would, however, allow a church use that is permitted by the residential land use designation but not allowed by the residential zone. The extension of time (EOT) references in this comment are not relevant to the church proposal but rather to the residential subdivision approved on the site by a prior applicant.

189-3

Refer to Master Response 3 on the project's consistency with the applicable land use policies from the General Plan, Community Plan, and zoning regulations, which addresses the specific policy concerns expressed in this comment. The site's underlying land use designation and zoning would remain residential, as stated on DEIR page 5.1-10. The DEIR Section 5.1 further states on pages 5.1-10 and 5.1-38 that a non-residential use would be constructed on site instead of housing. The City does not have a zone classification for church or religious institutions.

189-4

Refer to Master Response 3 on the land use policy consistency. The DEIR Section 5.1 demonstrates that the church would comply with the applicable Residential Element policies in the Navajo Community Plan related to design. Commercial policies are not applicable to the project because the underlying land use designation is residential and the church is an institutional use that is allowed within the residential land use category, much like all the other religious institutions in the Navajo Community Plan area.

Comments

Responses

189-4 (cont.)	This project should be evaluated as the Commercial Use it is, not as a Special Institutional Use that would fulfill unmet Community or City needs.
189-5	This project should not be granted inappropriate special exemptions to the Navajo Community Plan nor to the San Diego General Plan or Development Codes due to the significant impacts that will occur, such as: 1. Adding a traffic signal that only benefits the Applicant with all impacts transferred to the existing users of College Avenue and the surrounding Communities. According to the Applicant, 95% of the traffic generated will come from south of the 8 freeway. (see attached image)
189-6	2. Accepting a flawed Traffic Study that fails to evaluate future growth because the Applicant refuses to provide their Consultant with appropriate projections for future growth. Having this data is common practice on projects of this magnitude (\$10MM+). They have falsely suggested their daily trip count to be approximately 280 vehicles, which conveniently is just below the 300 daily trip threshold which would materially change the viability of the project as proposed.
189-7	3. The complete erasure of the Del Cerro Community identity upon entering via College Ave by 1) allowing a 56,000 sq ft building that exceeds the allowed height limits to block all views of the existing homes and hillsides; and 2) allow a 71,000 sq ft two story parking garage joined to several acres of street level parking lots instead of the homes in the Reduced Residential Alternative. Additionally, the Draft EIR neglects to mention that the Reduced Residential Alternative does <u>not</u> require an additional traffic signal (In fact, it expressly forbade it), while the proposed project <u>requires</u> such a traffic light. This is also a material difference in project scope that cannot be considered equivalent.
189-8	The City of San Diego must reject this Draft EIR as insufficient in identifying significant impacts. New and accurate information from more detailed studies must be provided by the Applicant to allow decision makers and the public to knowledgeably ascertain the scope of these significant impacts.
189-9	The Reduced Residential Development Alternative is a far superior project, approved by the San Diego City Council, is properly zoned, and was twice extended by the Applicant, thereby validating its viability. It would meaningfully contribute to fulfilling the unmet housing and greenhouse gas emission goals of both the Community and the City.
	Respectively submitted. SaveDelCerro Michael Livingston 5558 Del Cerro Blvd San Diego, CA 92120

189-5

No special exemptions from the Community Plan or General Plan are proposed by the applicant. The deviations from the SDMC are allowed through the issuance of a Planned Development Permit, as described in the Project Description in DEIR Chapter 3 and pursuant to SDMC Section 126.0602 (a) (2). Both a Vehicle Miles Traveled (VMT) Assessment screening and Local Mobility Analysis (LMA) were reviewed and approved by City staff, in accordance with the City's Transportation Study Manual. As stated in DEIR Chapter 3 and Section 7.1.12, the LMA recommended that a new traffic signal would be constructed at the main ingress/egress to the church/sanctuary site and a second right in-right out driveway would be installed north of the signalized intersection. Based on the VMT screening in DEIR Appendix K, the project would not cause significant circulation effects on the surrounding roadways and intersections, as discussed in DEIR Section 7.1.12. Refer to Master Response 5 on VMT and LMA in the FEIR.

189-6

Future church growth in accounted for the trip generation outlined in the VMT screening and LMA (DEIR Appendices J and K). Traffic projections in the LMA and VMT analyses are based on transportation modelling conducted by SANDAG which factors in growth in the region over time. Refer to transportation Master Response 5 regarding trip generation, VMT and LMA in the FEIR for additional information.

189-7

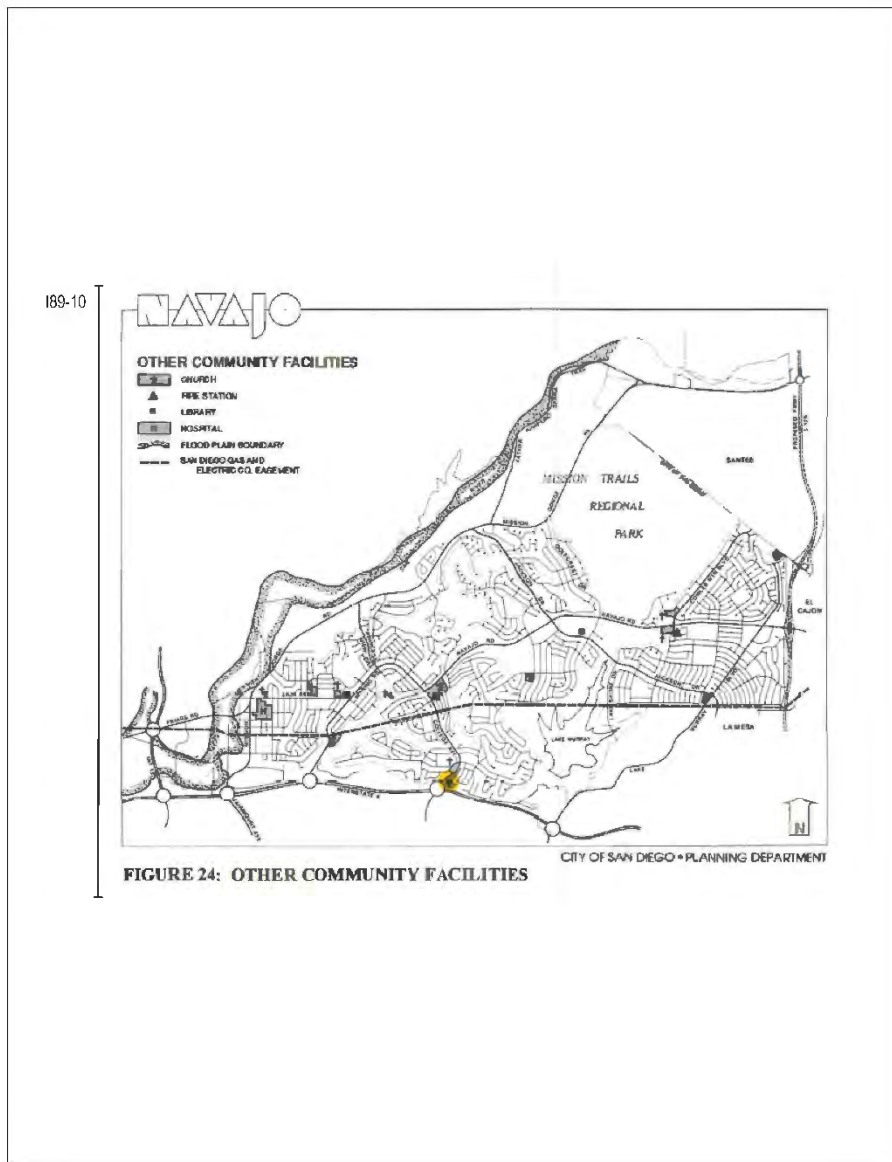
With regard to view blockage, the project would not exceed the City of San Diego Visual Effects Significance Determination Threshold as it would neither substantially block a view through a designated public view corridor as shown in an adopted community plan or the General Plan or cause substantial view blockage from a public viewing area of a public resource that is considered significant by the applicable community plan

Refer to Master Response 4 regarding neighborhood character. The 24-unit residential subdivision that was previously approved on site is described in the Reduced Residential Alternative and it would have similar significant impacts as the church/sanctuary project as discussed in DEIR Chapter 8, *Project Alternatives*. A traffic signal was not required by the City at the entrance to the residential

Comments	Responses
	<p>subdivision because it was not warranted based on that project's transportation analysis conducted in 2016. The traffic signal associated with the church project is warranted based on the 2020 LMA conducted in accordance with the City's Transportation Study Manual, which was amended after the residential project was approved to require VMT analysis as the CEQA metric in addition to an access analysis.</p>
	<p>189-8</p> <p>The claims made in this comment provide no specificity, are speculative and not supported by the evidence. The DEIR adequately analyzes the project's impacts, in accordance with the City's Significance Determination Thresholds and technical guidance.</p>
	<p>189-9</p> <p>Comment noted. Building housing is not a project objective stated in DEIR Chapter 3 and an alternative land use for the site was rejected for that reason in DEIR Chapter 8, as discussed in Master Response 1 on the issue. Furthermore, the DEIR Alternatives discussion clearly demonstrates that the significant impacts of the would not be substantially lessened or reduced through adoption of the Reduced Residential Development Alternative. Based on the analysis provided in the DEIR, less than significant greenhouse gas impacts would occur with project implementation.</p>

Comments

Responses



189-10

This comment's attachment is a figure from the Navajo Community Plan. No response is required.

Comments

Responses

3.1.3.90 Letter I90: Meaghan Loud

Letter I90

From: Meaghan Loud <meaghan.loud@gmail.com>
Sent: Sunday, October 16, 2022 3:51 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Public comment on All Peoples Church/No 636444

Hello,

I90-1 > I am a registered voter and a resident of Del Cerro/Navajo Community Plan Area and I would like to submit the following as a public comment on the Draft Environmental Impact Report regarding the project All Peoples Church, project no. 636444.
>
> The Draft Environmental Impact Report regarding the project All Peoples Church, project no. 636444, has determined that the proposed project would result in significant environmental effects in the following areas: biological resources, historical resources, noise, and Tribal cultural resources. It is vital that the site of the proposed project remain vacant in order to avoid the significant environmental effects in the aforementioned areas. I do not think that constructing a megachurch and huge parking structure are worth the significant environmental and Tribal cultural destruction that would necessarily occur if the project were to proceed, even at a reduced project level. Please reject this project in its entirety. It will not serve the residents of this community, and it will only cause further environmental destruction and loss of significant historical and Tribal cultural resources.
>
> Signed,
> Meaghan Loud
> 5917 Overlake Ave
> San Diego, CA 92120

I90-1

This comment does not address the adequacy of the DEIR. As noted in this comment, the project would have significant impacts to biological resources, historical resources, noise and tribal cultural resources, as outlined in DEIR Sections 5.2, 5.3, 5.4, and 5.6. Adoption of the No Project Alternative would avoid the project impacts noted in this comment, as identified in the DEIR. However, the No Project Alternative would not achieve any of the applicant's basic project objectives, as described in DEIR Chapter 3 and Section 8.3.3. General opposition to the project is addressed in Master Response 6 on that issue.

Comments

Responses

3.1.3.91 Letter I91: Michael Lovci

Letter I91

From: Michael Lovci <michaeltlovci@gmail.com>
Sent: Friday, October 14, 2022 3:47 PM
To: DSD EAS <DSDEAS@sanidiego.gov>; Blake, Martha <MBlake@sanidiego.gov>; Holowach, Courtney <CHolowach@sanidiego.gov>
Cc: Jeanne Lovci <jeannelovci@gmail.com>
Subject: [EXTERNAL] College Ave canyon development

I91-1 Thank you for your attention to this matter that concerns a natural canyon against my grandmother's backyard that should be a park, per promises from city concilermembers in the past decades. My grandmother has been unable to participate with these proceedings due to her advanced age. The adjacent neighbors vehemently opposed development historically.

Clearly to me the all peoples project fits better where the abandoned Frye's Electronics sits off 15.

Michael Lovci
5620 Honors Dr
San Diego CA 92122
----- Forwarded message -----
From: Save Del Cerro <savedelcerro@gmail.com>
Date: Fri, Oct 14, 2022, 3:18 PM
Subject: Save Del Cerro UPDATES & ACTION ITEMS
To: Save Del Cerro <savedelcerro@gmail.com>

I91-2 Hello from Save Del Cerro. You are receiving this because you've reached out to us over the past few years regarding our opposition efforts to the ALL PEOPLES CHURCH MEGA PROJECT.

There are a number of ways you can currently support our efforts.

ENVIRONMENTAL IMPACT REPORT

As you may be aware, the City of San Diego recently released the DRAFT ENVIRONMENTAL IMPACT REPORT. You can view this 294 page document [here](#). The public comment period is scheduled to close at the close of business on October 17th MONDAY, however we have requested a 2-week extension from the City (not yet confirmed they will honor that request).

Please send a letter to the City of San Diego representatives, Courtney Holowach (cholowach@sanidiego.gov), Martha Blake (mblake@sanidiego.gov) and DSDEAS@sanidiego.gov before MONDAY.

You'll want to focus your letter on THREE MAIN CONCERNS:

1. **Housing Crisis** (SD City Councilmembers, the ones whose vote will determine the fate of this project), have all acknowledged that San Diego is in a severe housing crisis. Remind them there is already an approved 24 unit housing project e titled to the land. By approving the mega project, they are essentially voting NO on housing. Make it clear there is a viable alternate project. That is an important argument.

I91-1

This comment does not contain specific comments on the adequacy of the DEIR. Refer to Master Responses 1 and 6 regarding general opposition to the project and alternative uses for the site, including parkland. There is a 2-acre dedicated parkland property fee-owned by the City Parks and Recreation situated immediately to the south between the project site and the Caltrans ROW that would remain intact after project implementation.

I91-2

Comment noted. Refer to Master Responses 3, 5, and 6 regarding general opposition to the project, residential housing policy, land use policy consistency, and vehicle miles traveled (VMT).

Comments

Responses

I91-2
(cont.)

2. **San Diego Municipal Code, Table 131-04B**, Use Regulations Table for Residential Zones, specifically disallows Religious Assembly in RS 1-7 Zoning. Without a general plan amendment This project would be a violation of San Diego's Municipal Code. Additionally, the Navajo Community Plan does not adequately incorporate or consider appropriate siting of religious institutions and would also need to be revised.

3. **Environmental Concerns/VMT (Vehicle Miles Traveled)**: The project applicant has admitted they expect 95% of the people attending their site to come from out of the area, and then leave the area, in essence doubling the greenhouse gas emissions as they cater to an audience from out of the area. This runs counter to the City's [Climate Action Plan](#) of reducing greenhouse gas emissions. (See attached image from the applicant's presentation)

CONTACTING COUNCILMEMBERS

[This website](#) has the list of all 9 councilmembers phone numbers and email addresses. District 2, 4, 6 and 8 are up for re-election next month. Only CM Chris Cate is termed out, so you can skip him. It would be ideal to CALL & EMAIL each of the other 8 councilmembers. It also makes sense to reach out to Kent Lee, who is the frontrunner candidate for District 6, <https://www.kentleeforsd.com>.

JoelaCava@saniego.gov 619-236-6611

JenniferCampbell@saniego.gov 619-236-6622

StephenWhitburn@saniego.gov 619-236-6633

MMontgomerySteppe@saniego.gov 619-236-6644

MarnivonWilpert@saniego.gov 619-236-6655

RaulCampillo@saniego.gov 619-236-6677

VivianMoreno@saniego.gov 619-236-6688

SeanElorivera@saniego.gov 619-236-6699

info@kentleeforsd.com

Use the THREE issues mentioned above for your calls/emails.

NEXT STEPS

Once the review period is completed for the Environmental Impact Report, it will become "final", the project will eventually go back to the Navajo Community Planners for a symbolic vote (a no vote won't stop the project), then off to the Planning Commission for a vote (again, a no vote won't stop the project), and finally to the only vote that counts: City Council, where a simple majority determines if the project is approved or denied.

We will continue to keep you updated on this timeline and what action steps best support our efforts to STOP the MEGA PROJECT.

Any questions, ideas, etc please let us know.

Thank you,
Save Del Cerro

Comments

Responses

3.1.3.92 Letter I92: Mark Luciano

Letter I92

From: MJ Luciano <mjluciano@gmail.com>
Sent: Thursday, October 13, 2022 4:29 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] RE: All Peoples Church

RE:
All Peoples Church No. 636444 SCH No. 2021100394 Community Plan: Navajo Council District 7

I92-1 | Please keep me informed re: All Peoples Church project. As a resident of Del Cerro, I am deeply concerned regarding the environmental impact of this project. It is my hope the project will be canceled due to its probable adverse impact on our community and neighborhood. This project should be redirected to a more appropriate area of town zoned for these types of facilities.

Thank You,

Mark Luciano

I92-2 | "The lead agency may require the project applicant to supply data and information both to determine whether the project may have a significant effect on the environment, and to assist the lead agency in preparing the draft EIR. The requested information should include an identification of other public agencies that will have jurisdiction by law over the project.
Any person, including the applicant, may submit information or comments to the lead agency to assist in the preparation of the draft EIR."

I92-1

Refer to Master Response 6 regarding general opposition to the project. Contrary to statements made in this comment, the project would not result in significant neighborhood character impacts as stated in DEIR Section 5.5. Refer to Master Responses 1 and 4 on neighborhood character and alternative sites.

I92-2

Comment noted but it does not address the adequacy of the DEIR.

Comments

Responses

3.1.3.93 Letter I93: Sandy Luebben

Letter I93

From: Sandy Luebben <sandyluebben@gmail.com>
Sent: Monday, October 10, 2022 11:30 AM
To: DSD EAS <DSDDEAS@sanidiego.gov>
Subject: [EXTERNAL] environmental impact

I93-1 | The project All Peoples church project no. 636444 aaaaSCH no. 2021100394 for the Navajo Community Plan, Council district 7 I oppose. I oppose this because of the huge traffic problem for that number of cars trying to enter and exit the area. College Ave is a very busy street and the intersection of Del Cerro Blvd. and College is extremely congested at all times. I have lived within 3 blocks of the intersection for over 55 years and have seen that intersection go from no stop sign to the left turn signal of today. No matter what traffic pattern they try to invent, they have to use the main intersection. The signal is often run by red light drivers now, more accidents will occur and deaths are probable.
Sandra Luebben
6110 romany Drive
San Diego, Ca 92120
Worried Citizen

I93-1

The DEIR Appendix J, *Local Mobility Analysis* (LMA), conducted on the project evaluates where improvements are required for site access and to determine whether there are any deficiencies in the local circulation network that surrounds the project site that could be exacerbated by the project but is not an analysis conducted to comply with CEQA (refer to Master Response 5 on vehicle miles traveled (VMT)). City staff identified the intersection of College Avenue and Del Cerro Boulevard for a systematic safety review. The LMA conducted a review of the accident history for the latest available five years (2015–2019) at the intersection of College Avenue and Del Cerro Boulevard and concluded that no specific pattern of pedestrian-vehicle accidents was found for the study period. Therefore, no safety improvements were required at that location.

Comments

Responses

3.1.3.94 Letter I94: Stephanie Macceca

Letter I94

From: Stephanie Macceca <smacceca@gmail.com>
Sent: Sunday, October 16, 2022 10:35 PM
To: Holowach, Courtney <CHolowach@sandiego.gov>; Blake, Martha <MBlake@sandiego.gov>; DSD EAS <DSDEAS@sandiego.gov>
Subject: [EXTERNAL] The All People's Church project in San Diego

Dear City of San Diego representatives, Courtney Holowach (cholowach@sandiego.gov), Martha Blake (mblake@sandiego.gov) and DSDEAS@sandiego.gov,

I94-1 | I am writing this letter in reference to the Environmental Impact Report for a 5 acre parcel of land submitted by the All People's Church in Del Cerro. I have been a resident in this area since 2001, and I do not want a mega church built in my community.

I94-2 | CalTrans reconfigured the on-ramp to I-8 going westbound from Del Cerro after the EIR was completed and the Traffic Study was completed. This change in the on-ramp has completely changed the traffic leaving Del Cerro. As a result, cars leaving the community in the morning between 7 and 9 am experience significant delays and backups. Check the logs: an ambulance could not make it through the gridlock because the traffic lights going southbound on College Avenue are not timed to work in sequence. The wait time from Del Cerro Blvd to go eastbound on I-8 can take 20 minutes. Furthermore, San Diego State has increased enrollment, and more cars are coming on to campus this year. Additionally, Hearst Elementary starts at a later time. When I leave for work, I'm locked in traffic from Rockhurst, waiting to get onto the freeway, and I don't even encounter the Hearst traffic. As a result, I've been driving through San Carlos to get to work. Residents going westbound are driving through Allied Gardens to avoid the traffic. The EIR report and the Traffic Reports do not account for these changes or the effects of these changes at all. The only concern is the number of cars that are driving through Del Cerro rather than getting onto the freeway.

I94-3 | All People's Church plans to have 3 services on Sundays, filling all 900 seats at each of the services. The EIR report doesn't account for weddings, funerals, baptisms, and the 46 group weekly meeting events as listed on their website. The report predicts that 95% of the people attending the church will come from out of the area, and then leave the area, in essence doubling the greenhouse gas emissions as they cater to an audience from out of the area. This runs counter to the City's Climate Action Plan of reducing greenhouse gas emissions, but more importantly, it grossly underpredicts the increase in greenhouse gas emissions as a result of the increase in traffic--cars just idling, waiting, and moving in small increments.

I94-4 | I am also deeply concerned that this project continues to move forward in a city where the headlines consistently report that there is a significant housing shortage. The land is zoned for housing, and if the church is built, it is in direct violation of the San Diego Municipal Code. The community of Del Cerro welcomes the construction of new houses. My property taxes are over \$12,000.00 a year. 24 houses on the plot of land will generate the city over \$300,000.00 in property taxes each year. The church will generate zero dollars in property taxes. This project violates the Navajo Community Plan, a plan that I read and respected as accurate when I bought my home in this community. To rezone the land is a betrayal to the people who trusted it.

I94-5 | Please do not approve this project for construction.

Stephanie Macceca
6081 Bounty Street
San Diego, CA 92120
(619) 405-3476

I94-1

Comment does not address the adequacy or content of the DEIR. General opposition to the project is noted and is addressed in Master Response 6 on that non-CEQA issue.

I94-2

The environmental (traffic) conditions for analyzing project impacts were established at the time the Notice of Preparation (NOP) for the DEIR was published, in accordance CEQA Guidelines Section 15125, *Environmental Setting*, and with standard practice at the City. Any subsequent changes by Caltrans to the I-8 westbound ramp operations would not substantially change the adequacy of the DEIR because the project was screened out as a small project during the Vehicle Miles Traveled (VMT) Assessment and would not result in significant traffic impacts.

I94-3

The project's volume of trips was conservatively developed using the methodology contained in the City's Transportation Study Manual, as addressed in Master Response 5 on trip generation. Construction of the project would not double the amount of greenhouse gas emissions in the local area or region. As demonstrated through calculations and policy analysis contained in DEIR Section 7.1.5, the project would generate less greenhouse gas emissions than the 52 residences that are allowed on the project site (as shown in DEIR Tables 7-7 and 7-8). In addition, it would not result in significant greenhouse gas emissions and would be consistent with the City's Climate Action Plan (CAP) by complying with the various greenhouse gas emissions reduction strategies outlined in the project's CAP Consistency Checklist (refer to DEIR Appendix B). Furthermore, a VMT screening analysis was conducted (refer to DEIR Appendix K) which shows that the project is presumed to not result in significant transportation impacts. Therefore, the project is consistent with the City's CAP and related policies.

Comments

Responses

194-4

No specific DEIR inadequacies or deficiencies are noted in this comment. Refer to Master Response 3 regarding residential housing policy. Additionally, the project does not require a rezone because of the proposed Planned Development Permit (PDP) pursuant to San Diego Municipal Code (SDMC) Section 126.0602 (a) (2), as described in Master Response 3 under land use policy consistency.

194-5

Refer to Master Response 6 regarding general opposition to the project.

Comments

Responses

3.1.3.95 Letter I95: Thomas Marshall: September 17, 2022

Letter I95

I95-1 I am writing to object to several mistakes and some blatant propagandizing included in the EIR for All Peoples Church/No. 636444. I am not an expert in all the areas that have caught my attention, but I am a nearly lifelong resident and user of the general area where this proposed project would be built. I pass through the exact area frequently these days.

The first and most obvious concern for me is traffic. This project would hugely alter the flow of traffic in an already heavily impacted area. The intersection of College and Del Cerro could become badly backed up in all directions with this insertion of a simultaneous traffic load of three-hundred-or-more cars at times. The traffic load at Friars Road Cost Co, familiar to us all in this part of town, where the city has created a dreadful permanent snafu, is usually only thirty or forty cars from each direction at its worst. Multiply that by five or more, and you will begin to see the mess being proposed. The addition of turn lanes in both directions on College will only make this worse with so little room for them or for traffic back-ups beyond them. This would be especially problematic down the hill toward the freeway. Congestion from SDSU traffic in addition to the regular flow of neighborhood traffic is already a problem of noise, air pollution, and environmental deterioration. Adding the load of churchgoers would make it obscene. The EIR is incorrect in judging these impacts to be negligible, way wrong and dead wrong.

Linked to these proposed traffic changes is the issue of "neighborhood character." Neighborhood character is certainly challenging to define, partly because it changes, but on-going history is one important key to that kind of definition. This project, in terms of history or of present look, is undeniably a monstrous change for Del Cerro. Its location, admittedly taking advantage of a piece of real estate beside the freeway for advertising purposes (v. objective #1 in ES-1), stands out immediately as a big change. These buildings would be the first thing most people see of Del Cerro and would set a completely different tone for the neighborhood, calling out for attention and appealing to a very restricted portion of the population. The proposal's request for a deviation from the rules that apply to everyone else, in order to allow the erection of yet another blatant advertisement--the cross, is grossly vulgar. Religious assembly is a great freedom guaranteed by our laws, but blatant trumpeting of a particular religion is not. This eyesore to most of us would be completely out of character with Del Cerro and its history.

I95-1

The contents of this letter were included in a previous comment letter and are redundant with those prior comments; refer to responses to comment I52-2 which addresses the same issues contained in this letter. The criticisms of specific sections of the DEIR are general in nature and do not provide any specific evidence that contradicts what is presented in the DEIR.

Comments

Responses

195-1
(cont.)

My other big area of contention with this EIR and plan also has to do with the “character” of Del Cerro but over a much longer term. This location has a major ecological function and practical function as a buffer zone from the freeway and for the drainage of this area. The spot is not isolated from its larger drainage, though corruptions of the landscape over the years may have made it seem so.

My residence in Allied Gardens over parts of seven decades, my childhood habit of fishing at Lake Murray, my presidency at Lewis Jr High involving me with the Del Cerro community, and my shopping at what is currently Windmill Farms on Del Cerro Blvd, all have put me in touch with the landscape in and around the neighborhood of this project. I have watched the connected Adobe Falls area nearby fill in and get re-landscaped over the years. I am, again, no scientific expert about this, but my acquaintance with the landscape and changes brought about by human manipulation prompt some strong opinions based on my experience as a kid, a birder, a botanist, and now an amateur entomologist.

As kids, we roamed this area and chased its lizards alongside the roadrunners. Del Cerro was minimally developed when I first saw it. The freeway was not there yet. We lived just east on Maryland in La Mesa where a stream flowed west and connected our neighborhood to Del Cerro on the other side of the Murray dam and on into Adobe Falls. When I later lived in Allied Gardens, I discovered that this same flow of water connected further west through Adobe Falls and on into the San Diego River in Grantville—and it still does. Broken up now by lot-building, landscaping, road-building, flood channels, and culverts, this stream (called Alvarado Creek on some maps) is an artery for this nursery of flora and fauna.

The proposed project is another interruption in this flow and its ecological service to the larger natural community. Even the current situation, with a dirt catchment basin at the freeway end of the property under consideration for development, maintains a useful role in the water supply and drainage of this area. Adobe Falls is presumably still there, though the immediate area is closed to any trespassing by the University and held as the “SDSU Alvarado Canyon Ecological Area.” Its ecology includes that whole Alvarado Canyon corridor in which the building and paving proposed would cut down on absorptive surface by a large percentage. This would affect both groundwater and surface flow to the lower creek all the way to the

Comments

Responses

195-1
(cont.)

river. Areas like this, with year-round or a good seasonal flow, are essential to the life cycles of many local fauna and flora.

For instance, this year in my corner of Allied Gardens, I have observed many of our more bright and beautiful neighbors making use of the nearby waters of the river (as they used to also use the creek that ran where Allied Road was eventually added onto the neighborhood) for sustenance, dwelling, reproduction, and interaction. These include birds (*Icterus cucullatus*), dragonflies (*Libellula saturata*), moths and butterflies (*Leptotes marina*), spiders and other "creepy"-crawlies (*Peuceetia viridans*), reptiles (*Uta elegans*), as well as many many delightful others. These species are not protected rarities but everyday parts of our neighborhood. And they are not there just for our delectation. Their lives form the natural basis of our own. Our sciences are just beginning to uncover the interweavings involved. Our regulations have begun to respect them. Spots with water like Adobe Falls, Alvarado Creek, and the river bend by the mission support these life cycles and demand protection. Spots with infrequent water, like the parcel proposed for development, also help by absorbing and slowing the westward flow of the water on that drainage and deserve protection as

The law provides such protection in many ways, even zoning. One of the many reasons why "single-family dwelling" zoning should not be allowed deviation is the violation of such important open surfaces for absorption of rain. Getting less rain these days makes this even more significant. Every square foot covered with an impervious (and often pollutant-laden) surfacing is a danger to us all. This project on this site would become a grave danger to this natural nursery area. If only for its damselflies and dragonflies, this would be a treasured spot. Building the proposed monstrosity less than a mile upstream from the sensitive nursery area (whatever streaming gets through these days) is a direct offense to the local ecology. Where the proposal says "all runoff water from the project would be collected and treated on the project site in water quality basins and discharged into the city storm water system," it is revealing a gross error about the best practice in usage of that water. Polluted by automotive leakages, yes, this water should be filtered or diverted, but allowed to fall on filtering ground and to enter the local water-cycle this storm-water would be the resource that it truly is and should be.

Comments

Responses

195-1
(cont.)

↑ There has been a history of mistakes in regard to local hydrology, leading to the point now where people can hardly see what nature was up to here. Mistakes have been made in a number of ways over the years of deciding what to do with this stream and its drainage. Cement troughs, dirt drain-basins, culverts, and roads mar its flow. We cannot allow ourselves to add to that. There must be no SDP for this proposed project. Attempts at mitigation would only fall short and create further hazards for the Alvarado Creek area. Further interruption of the natural vegetation and its long-term achieved density would disrupt lives and hydrology there. Though the report has it accurately that there are “no wetland or riparian communities present on the project site,” this site is a link with nearby riparian areas like the SDSU preserve; it is what they now call an “ecotone” joining wet zone to wet. Causes raised there can affect areas well beyond the boundaries of this project’s own property. The proposal would create effects all along the corridor of Alvarado Creek. Raising the ground level, leveling the ground level, paving and building (to cover 41% of the area—sec 7.1.7), draining away run-off, and other aspects of the proposed project will create small natural disasters for the immediate area and downstream. The “Impact Analysis” in sections 5.2.4.2 & .3 is simply wrong; it follows a seriously flawed logic, a classic fallacy, in saying that the lack of wetlands on the project site means the project would have no impact on wetlands. This is false and falsifying; it shows that the argument here is falsely framed by the proposers and suggests that their ignoring actual cause-and-effect in nature may not be mere ignorance.

Specific sections of the EIR where falsifications and fallacies show up include 5.5.2.1 (failure to “provide for the long term conservation and sustainable management” of resources), 5.5.4.1 (failure to avoid strong contrast with surrounding development or natural features), 5.5.4.2 (failure to consider the impact in nature beyond immediate property), 5.5.6.1 (failure to consider the full impact of grading on hydrology in and around the property), 6.1 (failure to consider wider area, though the SDSU Ecological reserve is mentioned), 7.1.7 (failure to avoid impervious covering of ground with 41% coverage, and failure to use water as resource), and 7.4 (causing irreversible changes to landscape in and around the property—There has recently been a removal of trees on about half of the property, possibly the very trees mentioned in the EIR as nesting places for the Cooper’s Hawk that must be preserved). To approve the project would be to go against several existing objectives and regulations adopted by the city, mentioned in these EIR sections and elsewhere.

↓

Comments

Responses

↑
195-1
(cont.)

So, as invited to comment “on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated” (CEQA Guidelines Section 15204), I must say that the only legal and proper choice with this project is to determine that “No Project/No Development” may go on.

Most sincerely,
Rev. Dr. Thomas C. Marshall
6885 Cartwright Street
San Diego, CA 92120

(619) 582-4230
ToMarsha@Cabrillo.edu

Comments

Responses

3.1.3.96 Letter I96: Robert Martin

Letter I96

From: ROBERT MARTIN <statnow@hotmail.com>
Sent: Monday, October 10, 2022 2:41 PM
To: DSD EAS <DSEAS@sandiego.gov>
Subject: [EXTERNAL] All Peoples Church- Del Cerro

I96-1 | The proposed All Peoples Church environmental impact report does not reflect the many activities at this Mega Church on going that will be resulting in the severe impact to the ingress and egress of the community of Del Cerro. This project was surreptitiously replaced from a approved 24 single house development, by the developer. This plan is more in conformity with the general plan for the community. I implore you to reject the Mega Church proposal and restate your departments, and the city council approval for this housing development. The community of Del Cerro are in total support for the 24 single family housing project and totally reject the Mega Church. Let the people of Del Cerro have their voices heard and reject the All Peoples Church proposal.

Bob Martin
Del Cerro

I96-1

Building housing is not one of the applicant's project objectives outlined in DEIR Chapter 3. Nonetheless, the 24-unit residential subdivision referenced in this comment that was previously approved on site is described in the Reduced Residential Alternative and it would have similar significant impacts as the church/sanctuary project as discussed in DEIR Chapter 8. Thus, the housing would not substantially reduce or avoid any of the significant impacts of the project. General opposition to the project is addressed in Master Response 6 on that non-CEQA issue.

Comments

Responses

3.1.3.97 Letter I97: Anne McColl

Letter I97

From: anne mccoll <annemccoll@hotmail.com>
Sent: Sunday, October 16, 2022 1:11 PM
To: DSD EAS <DSDEAS@sandiego.gov>
Subject: [EXTERNAL] feedback on All Peoples Church No 636444

Dear City people:

I97-1 | This land was originally designated for homes. Putting a church with a 900-seat auditorium will increase the traffic immensely at an already busy intersection. This was a bait and switch. Quiet neighborhood streets will now be the scene of increase traffic.

Are there plans to put in a new traffic light on college before the Del Cerro Blvd/College Ave intersection?

I97-2 | This property is divided by a drainage ditch where run off water flows. It would be best for something like a self-storage facility.

Anne McColl :: Copywriter
I help brands tell stories that stick.
5942 Henley Drive | San Diego, CA 92120 | 619.261.4677

I97-1

The 24-unit residential housing development previously approved on site was projected to produce 260 daily weekday trips, as compared to the 280 daily weekday trips associated with the church, based on the prior project's technical study referenced in the Mitigated Negative Declaration adopted by the City. Transportation impacts of the project are analyzed in the DEIR Section 7.1.12 using a vehicle miles traveled (VMT) metric, as outlined in Master Response 5 on VMT. The project includes a traffic signal at its main entrance to facilitate access on College Avenue based on the Local Mobility Analysis (LMA) in DEIR Appendix J. Refer to Master Response 5 regarding the College Avenue operational changes and the LMA.

I97-2

Refer to Master Response 1 related to alternative location or use.

Comments

Responses

3.1.3.98 Letter I98: Medina Family

Letter I98

From: [Hollowach, Courtney](#) on behalf of DSD EAS
To: [Hollowach, Courtney](#)
Subject: Fw: [EXTERNAL] All Peoples Church/NO. 636444: Environmental Impact Report Comments
Date: Monday, October 3, 2022 8:24:46 AM

From: O Medina <omedina2276@gmail.com>
Sent: Sunday, October 2, 2022 11:05 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church/NO. 636444: Environmental Impact Report Comments

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To: Raynard Abalos, City of San Diego Development Services Center
From: Oscar Medina, 5669 Meredith Ave, San Diego, CA 92120
Subject: All Peoples Church Project number 636444, SCH No. 2021100394

I98-1 | Despite living in a major US city, my children and their friends have had the luxury of being exposed to unique wildlife not customarily observed within city limits. The proposed project location for project 636444 (All Peoples Church) is currently home to the following wildlife:
- Family of Grey Foxes
- Bobcat
- Family of Red Tailed Hawks
- California Gnatcatcher (Threatened)

The proposed project would not only destroy the homes of the wildlife, it would eliminate critical space for them to feed, live, and thrive. The project would be the end of the living alongside nature experience that is currently possible in Del Cerro.

I98-2 | Additionally, the noise level and corresponding traffic to the community will be irreparable. Since the project proposal, there have been two fatal crashes at the intersection of Del Cerro Blvd and College Ave. There continue to be regular significant vehicle crashes at the same intersection.

Del Cerro Blvd and Madra Ave also continue to be a danger to families and children that cross the intersection. There have also been multiple significant accidents at the intersection including a rollover crash (in a residential area).

The addition of a 1,000 seat church can expect to bring in 300-500 vehicles to the area on a regular basis, multiple times a day. With no easy access to the property, traffic will undoubtedly be backed up on Del Cerro Blvd and College Ave, both of which are already dangerous intersections. Furthermore, there is no access plan that will allow for seamless traffic entry to the property without the incursion of church traffic into the surrounding neighborhoods. Sunday's in Del Cerro now are famous for kids riding bikes, families walking their dogs, and children playing roller hockey or basketball on the neighborhood streets. All of the weekend activity in a calm safe environment will not be possible with hundreds of vehicles

I98-1

The wildlife species mentioned in this comment were not observed by the project's biologists during on-site field work. DEIR Section 5.2 addresses the project's impacts on biological resources, including wildlife habitat, which would be mitigated and reduced to less than significant, in accordance with the City's Biology Guidelines. The subject property is planned for future development in both the General Plan and Navajo Community Plan and not a part of the City's open space preserve system. Thus, its preservation is not critical to the conservation goals contained in the City's Multiple Species Conservation Plan (MSCP).

I98-2

The DEIR studied noise in Section 5.4 and concluded that the project would not result in operational noise impacts. The details of the noise analysis are also included in DEIR Appendix E.

The DEIR Appendix J, *Local Mobility Analysis* (LMA), conducted on the project is not an impact analysis under CEQA but, rather, evaluated where improvements are required for site access and to determine whether there are any deficiencies in the local circulation network that surrounds the project site that would be exacerbated by the project. City staff identified the intersection of College Avenue and Del Cerro Boulevard for a systematic safety review. The LMA conducted a review of the accident history for the latest available five years (2015–2019) at the intersection of College Avenue and Del Cerro Boulevard and concluded that no specific pattern of pedestrian-vehicle accidents was found for the study period. Therefore, the no safety improvements were recommended in the LMA at that location.

Comments

Responses

198-2 (cont.) ↑
traversing the local streets to access the Church. The noise associated with the traffic will place an undue burden on the local residents who's homes will become the thoroughfare for church traffic.
If egress through College Ave were possible, it would ease the burden upon the local residents. HOWEVER, I understand the city has determined that adding egress on College Ave would be dangerous or impede the flow of traffic. If a major street artery can not support the traffic, WHY is it being pushed into a local neighborhood even less capable of absorbing the traffic and risk.

198-3 | The project is even more of a threat to the safety and noise levels in the area with the addition of the proposed 100 unit apartment complex on Del Cerro Blvd between College Ave. and Madra Ave. The addition of over 100 units of housing, with no parking in the same two streets used to access the proposed All Peoples Church, would create a heavily congested area incapable of safely managing the traffic that already exists in the area.

198-4 | Please do not let this project proceed at the expense of local wildlife, and the true community experience still possible in Del Cerro. The project as proposed is a danger to our kids safety, the safety of our community, and the habitat to threatened wildlife typically not found in an urban environment.

Sincerely,
The Medina Family

Transportation is analyzed in the Vehicle Miles Traveled (VMT) Assessment screening analysis for the 900-seat, 356 parking space church and are presented in the DEIR Section 7.1.12. The project would not result in significant impacts. Refer to Master Responses 5 and 6 regarding VMT and the non-CEQA topic of College Avenue operational changes.

198-3

With regard to the application on the adjacent parcel received after the project's NOP was circulated, refer to Master Response 2 on cumulative impacts.

198-4

This comment does not address the adequacy of the DEIR. Refer to Master Response 6 regarding general opposition to the project.

Comments

Responses

3.1.3.99 Letter I99: David Mendel

Letter I99

From: David Mendel <zephyr813@gmail.com>
Sent: Friday, October 14, 2022 11:22 AM
To: Holowach, Courtney <CHolowach@sanidiego.gov>
Subject: [EXTERNAL] Fwd: EIR for all people's church project # 636444

----- Forwarded message -----
From: David Mendel <zephyr813@gmail.com>
Date: Fri, Oct 14, 2022 at 10:57 AM
Subject: EIR for all people's church project # 636444
To: <courtneyholowach@sanidiego.gov>

ms. holowach

I99-1 | this correspondence expresses my disagreement with the EIR prepared for project # 636444, as outlined in the navajo community planners, inc. correspondence of october, 2022, many of the conclusions are based upon outdated and incomplete information.

common sense dictates that this project is in direct conflict with the existing zoning designation of the property (rs-17). single family residence housing is not a 4 story parking garage, gymnasium, classrooms, etc. to suggest that such a massive project would not create traffic, safety, environmental problems, as well as negatively alter the character of the del cerro community, is simply incorrect and not true.

i urge you to reject the conclusions of the EIR and to conclude, correctly, that project # 636444 is not appropriate for the del cerro community of san diego.

thank you
david mendel

I99-1

Refer to Master Responses 3, 4, 5, and 6 regarding general opposition to the project, transportation, land use policy consistency, and neighborhood character effects of the project.

Comments

Responses

3.1.3.100 Letter I100: David Mendel

Letter I100

From: David Mendel <zephyr813@gmail.com>
Sent: Friday, October 14, 2022 6:37 PM
To: Blake, Martha <MBlake@sandiego.gov>
Subject: [EXTERNAL] opposition to all peoples church- project # 636444

ms blake

I100-1 | i am writing you to express my opposition to the all peoples mega church project in del cerro. please consider

1. the property is zoned rs-1-7- for single family residential housing. as you are probably aware, there is an existing 24 unit housing project already approved and titled to the property in question. a mega church with a 4 story garage, gymnasium, classrooms, offices, etc is NOT housing.
2. the san diego municipal code -table 131-04B specifically disallows religious assembly. absent an amendment to the general plan, this project would be in violation of the san diego municipal code.
3. the traffic, environmental, including vehicle miles traveled as the applicant has admitted that 95% of the people going to the site will be coming from outside of the del cerro area, clash with the san diego climate action plan.

in summary, the real estate zoning rs-1-7 does not permit such a project, its construction will actually exacerbate the housing crisis as it would not permit an already approved 24 unit housing project to proceed, and will create traffic and environmental problems for the del cerro area by actors coming from other locations.

thank you
david mendel

I100-1

The project is requesting approval of a Community Plan Amendment and Planned Development Permit. These approvals are permitted by procedures and policies contained in the General Plan and San Diego Municipal Code (SDMC). The SDMC Section 126.0602(a)(2) allows projects to propose a Planned Development Permit (PDP) to allow a use that is permitted by the land use plan but not allowed by the underlying zone. Therefore, it is not a violation of the SDMC to consider an application for a church on the subject property. In addition, as discussed in DEIR Section 7.1.5, *Greenhouse Gas Emissions*, the project would not result in significant greenhouse gas (GHG) emissions and would be consistent with the City's Climate Action Plan (CAP) by complying with the various GHG emissions reduction strategies outlined in the project's CAP Consistency Checklist (refer to DEIR Appendix B). Refer to Master Responses 3 and 6 regarding general opposition to the project, land use policy consistency and residential housing policy in the region for further discussion on these topics.

Comments

Responses

3.1.3.101 Letter I101: Julie Middlemas

Letter I101

From: julie middlemas <juliemiddlemas@yahoo.com>
Sent: Friday, October 14, 2022 11:15 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Project: All Peoples Church Project No. 636444

Dear Ms. Holowach:

I101-1 I'm writing to strongly object to the All People's Church Project being proposed in Del Cerro. This project seeks to turn residential property into what will become, in effect, commercial property. This is at a time when many people struggle to find affordable housing in the county and there is a well documented housing shortage. The SANDAG website is full of documents from many government agencies that depict the grim housing market. Here is a very recent document from the Housing Acceleration Project (HAP) that seeks to address this issue amongst the cities in the county. https://www.sandag.org/uploads/projectid/proiectid_617_31505.pdf

I101-2 Residential zoning needs to be protected for residential projects. In addition, there are a lot of empty commercial properties right now due to the effects of the pandemic and a move towards online business. This church could and should find another more appropriate and properly zoned location.

Please do what is right for the majority of people in this county and protect residential zoning.

Thank you.

Julie Middlemas
6115 Rockhurst Drive
San Diego, CA 92120

I101-1

Comment does not address the adequacy of the DEIR. General opposition to the project is noted and is addressed in Master Response 6 on that non-CEQA topic. Also refer to Master Response 3 regarding residential housing policy.

I101-2

The project would not rezone the property, as stated in DEIR Chapter 3 and Section 5.1. The site's residential zoning would remain intact because the City does not have a zone classification for church or religious institutions. The San Diego Municipal Code (SDMC) Section 126.0602(a)(2) allows projects to propose a Planned Development Permit (PDP) to allow a use that is permitted by the land use plan but not allowed by the underlying zone. That process is what is proposed to permit the church on a residentially zoned site. Refer to Master Response 3 regarding land use policy consistency as it relates to this comment on zoning. Refer to Master Responses 1 and 6 regarding general opposition to the project and alternative locations or use.

Comments

Responses

3.1.3.102 Letter I102: Vince Mikulanis

Letter I102

From: vince mikulanis <vmikulanis@gmail.com>
Sent: Monday, October 17, 2022 4:45 PM
To: Holowach, Courtney <CHolowach@sanidiego.gov>; Blake, Martha <MBlake@sanidiego.gov>; DSD EAS <DSDFEAS@sanidiego.gov>
Cc: CouncilMember Joe LaCava <JoeLaCava@sanidiego.gov>; Councilmember Jennifer Campbell <JenniferCampbell@sanidiego.gov>; Councilmember Stephen Whitburn <StephenWhitburn@sanidiego.gov>; Councilmember Monica Montgomery Steppe <mmontgomerysteppe@sanidiego.gov>; CouncilMember Marni von Wilpert <MarnivonWilpert@sanidiego.gov>; CouncilMember Raul Campillo <RaulCampillo@sanidiego.gov>; Councilmember Vivian Moreno <VivianMoreno@sanidiego.gov>; CouncilMember Sean Elo-Rivera <SeanEloRivera@sanidiego.gov>; info@kentleeforsd.com <info@kentleeforsd.com>
Subject: [EXTERNAL] All Peoples Church Draft EIR PUBLIC COMMENT

I am writing to you in regards to All People's Church, draft EIR concerning building a large church in the community of Del Cerro.

I102-1 The Draft EIR confirms several of the community's objections to this project and I urge you to deny this project the ability to move forward.

The project is unacceptable to the community for three main reasons.

1. **Housing Crisis** - There is an approved plan to build 24 low-density residential homes on the site. This will help alleviate the current housing crises by providing single-family residences that are in line with the current community character. There is plenty of high-density housing going in adjacent to Del Cerro in Grantville. The existing and approved plan of 24 low-density residences should move forward. The plan from All People's Church is inconsistent with helping to resolve the housing issue. There are plenty of places in the community where the Church can be located (How about the long vacant Frys off the 15 and Aero?)
2. **Zoning and General Plan** - The site is inconsistent with zoning and the City of San Diego's General Plan. Use Regulations Table for Residential Zones, specifically disallows Religious Assembly in RS 1-7 Zoning. Without a general plan amendment This project would be a violation of San Diego's Municipal Code. Additionally, the Navajo Community Plan does not adequately incorporate or consider appropriate siting of religious institutions and would also need to be revised. APC has not provided adequate reasoning for considering such a change other than they bought a piece of property with the intent to develop outside of the existing allowances. They were fully aware of the existing planned development and tried to back-door their project.
3. **Environmental Concerns/VMT** (Vehicle Miles Traveled): The project applicant has admitted they expect 95% of the people attending their site to come from out of the area, and then leave the area, in essence doubling the greenhouse gas emissions as they cater to an audience from out of the area. This runs counter to the City's [Climate Action Plan](#) of reducing greenhouse gas emissions. The applicant has gone back and forth on this issue, depending on what audience they wish to placate to. On one hand they say they want to be part of the Del Cerro community and paint the idyllic picture of families walking to their Mega-Church. In reality - 95% of site users will be from out of the area by their own expectations.

I102-2 Their information presented in the EIR is also inherently flawed. There simply is no potential alignment to the streets where people exiting the property will easily be able to get on I-8. This will greatly impact

I102-1

The comment does not address the adequacy of the DEIR; refer to the Master Responses 1, 3, 5, and 6 regarding general opposition to the project, alternative project location, or use of the site, and need for the project.

The housing crisis is not an environmental impact nor it is an environmental setting for the project, as discussed in Master Response 3 under residential housing policy.

With regard to the zoning and General Plan issues in this comment, refer to Master Response 3 on the project's consistency with the applicable policies from the General Plan, Community Plan and zoning regulations, which addresses the specific policy concerns expressed in this comment. A General Plan Amendment is not required as discussed in Master Response 3.

With regard to the environmental concerns and VMT matter, construction of the project would not double the amount of greenhouse gas emissions in the local area or region. As demonstrated through calculations and policy analysis contained in DEIR Section 7.1.5, the project would generate less greenhouse gas emissions than the 52 residences that are allowed by the City's Land Development Code (LDC) on the project site (as shown in DEIR Tables 7-7 and 7-8). In addition, it would not result in significant greenhouse gas emissions and would be consistent with the City's Climate Action Plan (CAP) by complying with the various greenhouse gas emissions reduction strategies outlined in the project's CAP Consistency Checklist (refer to DEIR Appendix B). Furthermore, a Vehicle Miles Traveled (VMT) Assessment screening analysis was conducted (refer to DEIR Appendix K) which shows that the project would not result in significant VMT impacts. Therefore, the project is consistent with the City's CAP and related policies.

I102-2

Refer to the Master Response 5 regarding VMT and the College Avenue operational changes. Project transportation impacts would be less than significant as discussed in DEIR Section 7.1.12. General opposition to the project is noted in the Master Response 6.

Comments

Responses

1102-2
(cont.) ↑
traffic on existing surface streets in the neighborhood, particularly College Ave/Waring Rd. Plans call for a cut out in the median to allow a left hand turn out of the property. But anybody familiar with the area clearly knows there is no way to accomplish this due to the increase in elevation of the southbound traffic from northbound lanes on College Ave.

I urge you again, please do not allow this project to proceed.

Vince Mikulanis
vmikulanis@gmail.com
619-921-2746

Comments

Responses

3.1.3.103 Letter I103: Michael Miller

Letter I103

From: Mike Miller <mikhmir@gmail.com>
Sent: Friday, October 7, 2022 3:17 PM
To: DSD EAS <DSD EAS@sandiego.gov>
Subject: [EXTERNAL] Re: All People's Church project #636444

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

I am writing to you today as a resident in Del Cerro, OPPOSED to the above reference project.

In addition to the issues raised in the Environmental Impact Report, I find this project would greatly disturb the Del Cerro community.

I103-1 Many of our roads are already insufficient for the amount of neighborhood and "cut through" traffic we experience daily. A few examples:

Madra Street is extremely busy as a cut through from San Carlos and the multiple residents needing to use this thoroughway to get in and out of our neighborhood for work, shopping and general life activities.

The intersection at Del Cerro Blvd and College is already a hazard for the amount of traffic that must navigate these multiple retail, school and church outlets. I cannot imagine adding 100 cars to where I witness multiple accidents or near accidents on a regular basis, much less a 50,000 sq ft facility with a 900 seat capacity.

College Ave North from Hwy 8 is already insufficient to accommodate the daily traffic and any additional entrance/egress points along this thoroughway for the referenced project would simply add to the danger many already experience with the inadequately designed intersections.

Simply put, this project should be rejected and no amendments to the Community Plans or current easements that keep our kids safe should be vacated.

Sincerely
Michael H Miller
5904 Overlake Ave
San Diego, CA 92120
619-985-5354

I103-1

The DEIR Appendix J, *Local Mobility Analysis* (LMA), conducted on the project evaluates where improvements are required for site access and to determine whether there are any deficiencies in the local circulation network that would be exacerbated by the project site but is not an analysis of impacts under CEQA. City staff identified the intersection of College Ave and Del Cerro Blvd for a systematic safety review. The LMA conducted a review of the accident history for the latest available five years (2015–2019) at the intersection of College Ave and Del Cerro Blvd and concluded that no specific pattern of pedestrian-vehicle accidents was found for the study period. Therefore, no safety improvements were recommended at that location. General opposition to the project is addressed in Master Response 6 on that non-CEQA issue.

Comments

Responses

3.1.3.104 Letter I104: Scott and Karen Miller

Letter I104

From: Karen Miller <scottandkarenmiller@gmail.com>
Sent: Sunday, October 9, 2022 8:21 PM
To: DSD EAS <DSDDEAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church Project #636444

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I104-1 | We can only hope the voice of the community will be heard on this project. The bottle neck today that occurs as you enter Del Cerro from I8 during peak traffic times is currently bad. I don't want to imagine what it will be like trying to get home when the daily events of this proposed project are in place. Consider how emergency services will be affected for the entire community. Will those exiting this facility have to make a u turn at College and Del Cerro Blvd? Imagine that back up of people lined up to cross to the far lane for a u turn. Will they be adding another traffic light instead? It's just over a 1/4 mile from the light where you exit or enter I8 to the light at Del Cerro Blvd. 3 stop lights in a 1/4 mile. REALLY? It's absolutely ridiculous!

I104-2 | What about the appearance at the entrance of our residential community. They plan on a multi level parking structure and an enormous church and additional facilities.

I104-3 | We are horrified by not only this structure but the proposal right around the corner of a six story Apt complex. Who is the person who put this through without community input? I can't wait to vote the current regime out of office. They should all be ashamed of the impact that their choices have had on so many families with ADU laws unlike anywhere else in the state, and cramming these monstrosities into our communities. STOP! LISTEN TO THE PEOPLE THAT HAVE TO LIVE THERE EVERY DAY! We DO NOT want the Peoples Church, Project 636444 to happen!

Scott and Karen Miller
Sent from my iPad

I104-1

Refer to Master Response 6 regarding general opposition to the project. The project includes a signalized intersection at the main driveway to the site based on the trip distribution contained in the Local Mobility Analysis conducted for the project (DEIR Appendix J). As shown in the access analysis, only 5 percent of the project's 280 daily weekday trips would utilize the College Avenue/Del Cerro intersection to access the site. This comment contains speculation on how project traffic would circulate through the intersection. The City acknowledges that a U-turn movement is not permitted at that location and signage exists to notify drivers. However, CEQA Guidelines Section 15145 prohibits speculation in an environmental analysis.

I104-2

DEIR Section 5.5 and Master Response 4 regarding neighborhood character address relative to the surrounding development project siting. The DEIR discloses that the project's massing and architectural style would be distinctive from that of the surrounding one-story, ranch-style homes in the vicinity, but further notes that the project has been carefully designed to respect the residential character to which it is adjacent.

I104-3

Refer to Master Response 2 regarding the DEIR cumulative impact analysis. General opposition to the project is addressed in Master Response 6 on that non-CEQA issue.

Comments

Responses

3.1.3.105 Letter I105: Patricia Mooney: September 20, 2022

Letter I105

From: [Crystal Pyramid Productions San Diego Video Company](#)
To: DSD-EAS
Subject: [EXTERNAL] All Peoples Church #636444
Date: Tuesday, September 20, 2022 9:20:45 AM

**** This email came from an external source. Be cautious about clicking on any links in this email or opening attachments. ****

I105-1 I am writing today in regards to the All Peoples Church that is proposed to be squeezed into a piece of land that seems like an after-thought in an otherwise lovely community Master Plan.

We drive past that spot several times a week. And lately, when we drive past, we say to each other, "This is the LAST place they should erect yet another mega-church." It's not like we need MORE traffic, and yet, that's what this plan would amount to.

At a time when more people are beginning to question their faith, and the force of religion in our political lives, instead of ramping up the construction of more churches, let's consider having LESS churches and more of Nature.

And we also take issue with the idea that anything needs to be built there at all. It's got to be either a housing development or a mega-church. Why? Our Del Cerro neighbors have been very clear that they consider this an invasion of their quiet neighborhood. We could not agree more. The idea that the All Peoples Church is evangelical in nature and purportedly supports Gay Conversion Therapy should be all you need to know to deny this project.

Best wishes,

Patricia "Patty" Mooney
Crystal Pyramid Productions
(619) 644-3000
<http://CrystalPyramid.com>
<http://instagram.com/crystalpyramidproductions>
<http://facebook.com/crystalpyramidproductions>

I105-1

These comments express opposition to the project and do not address the adequacy of the DEIR. Refer to Master Response 6 on general opposition.

Comments

Responses

3.1.3.106 Letter I106: Camellia Morteazazadeh

Letter I106

From: Camellia Morteazazadeh <camellia.anita@gmail.com>
Sent: Sunday, October 16, 2022 10:14 PM
To: Holowach, Courtney <CHolowach@sandiego.gov>; DSD EAS <DSEAS@sandiego.gov>; Blake, Martha <MBlake@sandiego.gov>
Subject: [EXTERNAL] Comments on Environmental Impact Report-All peoples church/no. 636444

To City of San Diego City Council Members:

I106-1 | I am a San Diego resident writing to express my deep concerns with the recently released Environmental Impact Report for the All Peoples Church. My family and I moved to Del Cerro in the past four years, and have significant concerns with the prospect of this project moving forward, namely:

1. This lot of land has already been approved for 24 units of housing. San Diego is in a housing crisis, and why not develop the land to house more residents, rather than a mega church that will create additional traffic and air pollution to the community? This development is counter to the housing needs of the city.
2. The proposed mega church development is counter to San Diego Municipal Code's regulations for residential zones, disallowing religious assembly in RS 1-7 zoning. Moving forward would require a general plan amendment or it would be a violation of the city code. There have already been questionable tactics by these developers and I would truly wonder why/how this could move forward, and why this project specifically despite so much community opposition.
3. Finally, this mega church would increase motor vehicle traffic (most visitors would come and go, and there is no public transit nearby, and attendees likely would not use public transit anyway), greenhouse gas emissions - as the proposed project for 400 members would need to accommodate A LOT of cars in a small residential area. This would also increase traffic, traffic accidents and reduce safety, all of which I care deeply about as my children walk to the local elementary school and around the neighborhood.

I hope City Council members will not be swayed by lobbyists for this church but from actual community residents themselves.

Thank you,
Camellia
Del Cerro Resident

I106-1

The comment does not address the adequacy of the DEIR; refer to Master Responses 1, 3, 5, and 6 regarding general opposition to the project, alternative location or use of the site, land use policy consistency, transportation, and need for the project. The project would not result in significant GHG emissions and would be consistent with the City's Climate Action Plan (CAP) by complying with the GHG emissions reduction strategies outlined in the project's CAP Consistency Checklist (refer to DEIR Appendix B).

Comments

Responses

3.1.3.107 Letter I107: Ryan Mosher

Letter I107

From: Ryan Mosher <rmosh49@gmail.com>
Sent: Sunday, October 9, 2022 12:59 PM
To: DSD EAS <DSDDEAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church/No. 636444

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hello,

I107-1 | My name is Ryan Mosher and I live in Del Cerro. I find this megachurch to be concerning. This large complex will be the first view of entering Del Cerro which does not represent this community. Del Cerro is full of diverse religions and backgrounds. The large complex will also possibly cause more traffic in our residential neighborhood. Street parking may become an issue and I don't want a bunch of cars to be taking up our streets. This venue also seems like it could be quite noisy which may disturb the people living nearby.

I107-2 | The All Peoples Church is just a profit machine which will be operating at the expense of the residents of Del Cerro. I staunchly oppose the plan and construction of this church. Please do not allow this plan to be approved.

Sincerely,

Ryan Mosher
6121 Romany Dr, San Diego, CA 92120

I107-1

These comments express opposition to the project and do not address the adequacy of the DEIR. Refer to Master Response 6 on general opposition.

I107-2

Refer to Master Response 6 regarding non-CEQA related comments including general opposition to the project.

Comments

Responses

3.1.3.108 Letter I108: J.G. Ney

Letter I108

DSD 636444 draft EIR.
All People's Church.

1108-1 | In reviewing the EIR report. I noted there is no reference to the environmental issues in reference to the residential property in question. As an example (coastal sage scrub), in addition, there is no reference made to the reptile population currently occupying the 8 1/2 acres that mitigate the rodent population which currently migrate from state property, specifically the concrete tunnel located beneath Interstate 8, which carries water from the surrounding areas to and through Adobe falls. If APCs mega project is built, who will be responsible to mitigate that current rodent population which is supported by SDSU's trash areas? Also, if APCs project goes forward and there are no natural predators can balance and control the rodent issue. How or who will have to address the rodent issue when increased rodent migration moves to Adobe falls and South Del Cerro? With no natural predators I see no data in reference to environmental controls of the current rodent/reptile population.

1108-2 | The traffic study is woefully remiss in its estimate of vehicle traffic and fails to address pedestrian traffic. APCs mega project sites a two-story parking structure that will accommodate 367 vehicles with no mention of surface parking. Current MTS services are not adequate. Walking to the (SDSU trolley station is 1 mile and 1.5 miles to the (Alvarado) trolley station.

1108-3 | The EIR is replete with insufficient information to make an informed decision to determine if APCs project should go forward.

I for one remain strongly opposed to APCs mega project going forward.


J. G. Ney
Del Cerro reservoir

I108-1

The issue of rodent populations noted in this comment is not a required topic for discussion in a DEIR. No additional response is required.

I108-2

A Local Mobility Analysis (LMA) was conducted for the project to address access and safety at intersections, street segments and freeway off-ramp queues in the project area. According to the analysis in the LMA, with the proposed traffic signal, median changes, sidewalk, and bike lane improvements in place, no additional off-site improvements would be required. The LMA is not a CEQA impact assessment as noted in transportation Master Response 5 on VMT and LMA.

I108-3

No specific DEIR inadequacies or deficiencies are noted in this comment; general opposition to the project is address in Master Response 6 on that non-CEQA issue.

Comments

Responses



Comments

Responses

3.1.3.109 Letter I109: Jackie O'Connor

Letter I109

From: Jackie O'Connor <jackie@oconnorschurchsupply.com>
Sent: Sunday, October 16, 2022 4:30 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church

Good Afternoon,

- 1109-1 As a resident since 1968 I am concerned about the following issues.
1. Safety of the roads of College Avenue and Del Cerro Boulevard.
 2. The creation of unsafe bike lane , Where riders Are led to cross a freeway entrance to Hwy 8 E. then 2 Alvarado Rd. which both are dangerous situation's.
- 1109-2 3. The EIR says the community is not impacted by this project. I disagree. The community is losing approximately 12 to 14 50 year old Pine trees. In addition the community is losing a very large portion of our decorated median.
- 1109-3 4. What consideration has been given to the impact that will happen once the six story building on College Avenue will be built?
- Thank you for considering my responses.
Jackie O' Connor

I109-1

The DEIR Appendix J, *Local Mobility Analysis* (LMA), evaluated where improvements are required for site access and to determine whether there are any deficiencies in the local circulation network that surrounds the project site that could be exacerbated by the project. City staff identified the intersection of College Ave and Del Cerro Blvd for a systematic safety review. The LMA conducted a review of the accident history for the latest available five years (2015–2019) at the intersection of College Ave and Del Cerro Blvd and concluded that no specific pattern of pedestrian-vehicle accidents was found for the study period. Therefore, the no safety improvements were recommended at that location. With the proposed traffic signal, median changes, sidewalk, and bike lane improvements in place along the project frontage, no additional off-site improvements are required.

I109-2

Contrary to this comment, DEIR Section 5.2 concludes that that project would result in significant impacts to biological resources and identifies mitigation to reduce the impact to below a level of significance. With regard to the trees situated on the project site, proposed construction would remove existing trees but would plant 92 more trees than exists today (DEIR Section 3.2.7). The applicant's median improvements are being coordinated closely with the City staff.

I109-3

Master Response 5 provides detail regarding how the VMT analysis is used to address both direct and cumulative impacts, consistent with the Office of Planning and Research guidance for assessing transportation impacts under CEQA.

Comments

Responses

3.1.3.110 Letter I110: Vince Outlaw

Letter I110

From: Vince Outlaw <vo@vinceoutlaw.com>
Sent: Friday, October 14, 2022 11:28 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church/No. 636444.

I110-1 | Del Cerro does NOT need All Peoples Church, we need the housing that area is zoned for and was approved for.
All Peoples Church took control of that land underhandedly and they are opposed by many in the community. They already have sites of worship in San Diego and we don't need another in Del Cerro.
DO NOT APPROVE their project and work to put the needed housing back where it belongs.
Thank You

I110-1

Comment does not address the adequacy or content of the DEIR. General opposition to the project is noted and is addressed in Master Response 6 on that topic, as well as the need for the project comment.

Comments

Responses

3.1.3.111 Letter I111: Rosaura Picasso

Letter I111

From: Rosaura Picasso <onerosaura@gmail.com>
Subject: All Peoples Church Mega Project in Del Cerro, San Diego
Date: October 14, 2022 at 4:51:32 PM PDT
To: chelowach@sandiego.gov
Cc: DSDEAS@sandiego

Dear Gentelperson:

I111-1 I strongly **oppose** to the project All Peoples Mega Project in Del Cerro, San Diego for the following reasons.

1. Will all know that we have a **severe housing crisis**. **This sight has been already pre-approved for a 24 unit project** title to the land. However, this pre-approved housing project is been ignored and substituted for a Mega Churh in a neighborhood that already counts with an abundant amount of empty, not tax paying churches, synagogues and similar. No doubt the needs of the population are not being taken into account if a Church is being built instead of housing.
2. **San Diego Municipal Code Table 131-04B specifically disallows religious assembly in a RS 1-7 zoning**, as this area is. Again, **this neighborhood has already a plethora of empty, not tax paying churches, while the tax paying people have no place to live**. There is no need whatsoever for any more, much less a Mega one that will disagree with this residential neighborhood.
3. **Enviromental Concerns?VMT**. The project applicant admits they expect **95%** of the people coming to their site to come from out of the area. This runs **counter to the City's Action Plan of reducing green hous emissions**.

Please do not forget that churches are tax exempt while owners of houses/condos pay very high taxes for the benefit of the City, the State and the country. At the same time churches neither create jobs except for a very few, neither promote the economy in any way.

Thank you very much for your time and consideration,

Yours truly,

Rosaura Picasso.

I111-1

The comment does not address the adequacy of the DEIR; refer to Master Responses 1, 3, 5, and 6 regarding general opposition to the project, alternative location or use of the site, land use policy consistency, VMT and need for the project. The project would not result in significant GHG emissions and would be consistent with the City's Climate Action Plan (CAP) by complying with the GHG emissions reduction strategies outlined in the project's CAP Consistency Checklist (refer to DEIR Appendix B).

Comments

Responses

3.1.3.112 Letter I112: Michael Poltorak

Letter I112

From: poltorakmi@cox.net <poltorakmi@cox.net>

Sent: Friday, October 7, 2022 6:33 PM

To: DSD EAS <DSDEAS@sanidiego.gov>

Subject: [EXTERNAL] All Peoples Church, Prj #636444, Sch #2021100394, Navajo District 7

Attention Courtney Holowach:

I112-1 I am opposed to approving the All Peoples Church Project. The size and scope of the project is inconsistent with the tradition, character and feel of this quiet Del Cerro neighborhood.

Thank you,

Michael Poltorak
5884 Ridgemoor Dr.
San Diego, CA 92120

I112-1

Refer to Master Response 6 regarding general opposition to the project.

Comments

Responses

3.1.3.113 Letter I113: Bill Poulin

Letter I113

From: William Poulin <bpoulin71@hotmail.com>
Sent: Tuesday, October 11, 2022 2:32 PM
To: DSD EAS <DSD EAS@sandiego.gov>
Cc: Gloria, Todd (External) <MayorToddGloria@sandiego.gov>; CouncilMember Raul Campillo <RaulCampillo@sandiego.gov>
Subject: [EXTERNAL:] Project No 636444 - All Peoples Church

There are already lines of traffic from the school and the temple. This project will only makes things worse!

I113-1 This is residential area where there is already a church down the street and a temple and school within 50 yards.

There are several buildings within a few miles that are vacant and would be better places for a mega church. The people attending are NOT even from this neighborhood

I113-2 A few townhomes or additional single family homes that might make sense. A huge building on an intersection already clogged with traffic in a residential area makes no sense at all!

Project Name: All Peoples Church
Project No. 636444
SCH No. 2021100394
Community Plan Area: Navajo
Council District: 7

Bill Poulin
6033 Lancaster Drive 92120
619-200-7816

I113-1

Refer to Master Responses 1 and 6 regarding alternative sites for the project and general opposition to the project.

I113-2

The construction of housing is not a project objective stated in DEIR Chapter 3. As noted in the DEIR Section 7.1.12, the project's transportation impacts would be less than significant in accordance with the Vehicle Miles Traveled (VMT) Assessment screening. For additional discussion on the transportation issues, refer to Master Response 5 on VMT.

Comments

Responses

3.1.3.114 Letter I114: Irma Poulin

Letter I114

From: Irma Ponce <irmaponce72@hotmail.com>
Sent: Tuesday, October 11, 2022 2:31 PM
To: DSD EAS <DSD EAS@san diego.gov>
Cc: Gloria, Todd (External) <MayorToddGloria@san diego.gov>; CouncilMember Raul Campillo <RaulCampillo@san diego.gov>
Subject: [EXTERNAL] Project : All Peoples Church Project No 636444

I114-1 This Project is being proposed in a residential area where there is already a church down the street and a temple and school within 50 yards.

There are already lines of traffic from the school and events at the temple. We do not need to add more. This is not the location for this.

There is a 150 unit apartment building also being proposed right next to it.

Souplantaion on Fletcher parkway as well as several buildings in Grossmont center are vacant and would be better candidates for a mega church. The people attending will NOT be from Del Cerro. These will be people driving in from other locations. There is no reason to build here and add to the traffic.

This church also plans to offer services to drug addicts and homeless people. This is dangerous and unnecessary in a residential neighborhood with an elementary school and temple pre school across the street.

I am not anti development. If there were a few townhomes or additional retail space or single family homes that might make sense. But this is ridiculous that this would even be entertained.

Project Name: All Peoples Church
Project No. 636444
SCH No. 2021100394
Community Plan Area: Navajo
Council District: 7

Irma Poulin
Del Cerro Resident
6033 Lancaster Drive 92120

I114-1

This comment does not address the adequacy of the DEIR. Refer to Master Responses 1 and 6 regarding alternative locations for the project or alternative uses for the project site. and general opposition to the project. The operational church programs suggested in this comment are speculative, are not reflective of the project contained in the City's application and have no bearing on the environmental impacts addressed in the DEIR.

Comments

Responses

3.1.3.115 Letter I115: David Preciado

Letter I115

From: David Preciado <dmpreciado@yahoo.com>
Sent: Sunday, October 16, 2022 4:57 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Cc: dmpreciado@yahoo.com <dmpreciado@yahoo.com>
Subject: [EXTERNAL] All People's Church EIR Comments

Dear DSD representative,

Please find below my comments on the All People's Church EIR:

- 1115-1 The project:
- Does not take into consideration the needs / desires of the Community and has not approached local Community Groups focused on community improvement (Friends of Del Cerro or FODC).
- 1115-2
- Changes the visual character of the 'Front Porch' project, the entry to our community by making it more urban. Features that make it more urban:
 - narrower traveled lanes,
 - changes the grading / topography of the southbound lanes of College Avenue approaching the new intersection, which will change the driving experience when traveling southbound,
 - changes the southbound lanes drainage patterns, creating a safety issue during rain events through the new intersection that is created.
 - added bike lane - it does not indicate whether it is one-way or two-way; Two way bike lanes will be dangerous due to speed of bicyclists traveling southbound,
 - added new intersection with traffic signal - how does this impact the signal lights at College / Del Cerro intersection signals?
 - added left turn lane reducing the amount of median trees / landscape (creating an imbalance in the built / landscape ratio), this is also a visual issue and community concern issue.
 - introduces a 4' tall wall within the median (lower side),
 - a 12' wide sidewalk at the south end of the project that is too wide for this project.
 - a development that includes oversized architecture that is not fitting with the community scale, church & parking structure
- 1115-3
- An inconsistency in the streetscape treatment; does not make sense providing (2) applications where street trees are at back of walkway and within tree grates at the edge of roadway. How does this impact the Community plan? Community desires for a new entry gateway at this location? Tall established trees are proposed for removal...how does that impact the community plan or proposed FODC front porch project? What mitigation measures are proposed by the project to make up for the removal of the trees? Perhaps trees can be transplanted? Perhaps the loss of 2600SF of landscaped median can be mitigated by extending the median toward the south to make up for this loss.
- 1115-4
- An oversized sidewalk that is wider than the traveled lane striping for either lane entering or community; There will be many more cars than there will bicyclists.
 - There is only one bicycle lane provided; Is there not a bicycle lane proposed for the west side of the street?
- Mobility
 Bike lane design only accommodates bicyclists along the project frontage. What happens to bicyclists' safety south of or north of the project site? Why are no bike lanes proposed north of the project site? Do we simply dump bicyclists into traveled lanes with disregard to their safety?

I115-1

Comment does not address the adequacy of the DEIR.

I115-2

With regard to neighborhood character, refer to Master Response 4 on that issue. As noted in that response, the change in site character is described in detail and illustrated in figures that contain visual simulations in DEIR Section 5.5; impacts were determined to be less than significant based on the City's significance determination thresholds.

I115-3

The site plan and landscape design described in DEIR Chapter 3, *Project Description*, were reviewed by City staff for consistency with City Land Development Code requirements. Once implemented, the project would result in a net increase of 92 trees to the project site.

I115-4

A Local Mobility Analysis (LMA) was completed to roadway and other multimodal improvements would be required with the project. The new traffic signal at the main entrance, as well as the pedestrian and bicycle improvements along the project frontage with College Avenue were identified as required improvements as part of that analysis, as described in DEIR Chapter 3.

Comments

Responses

I115-5	<p>Traffic Traffic signals timing for intersection connection between the new intersection and College / Del Cerro Blvd intersection needs to be explained in further detail to understand timing impacts during the week and on weekend conditions.</p> <p>Have traffic studies proven that a left turn lane is necessary? Will a shared thru / left turn lane work without consuming the median / landscaping / existing stature trees?</p>
I115-6	<p>page 5.1-12, '5.1.4.2 Impact Analysis' <i>'No change to the local circulation patterns would occur as the project would involve the extension of a private driveway and secondary entrance to the site along College Avenue. In addition, the project would not introduce any barriers or project features that could physically divide the established Navajo community.</i> This statement is untrue as a new signalized intersection adds a new circulation pattern that impact what exists. New intersection signaling will also impact the signaling of intersection at College / Del Cerro Blvd.</p>
I115-7	<p>Page 5.1-11, 'Community Plan Consistency'</p> <ul style="list-style-type: none"> • <i>'the project would maintain the existing residential land use designation and zoning on the site. A project objective is to provide a church-owned property for an existing congregation and would involve the construction of a non-residential, religious assembly use rather than housing.'</i> How does the project 'maintain existing residential land use designation when they clearly are proposing a church that does not meet the 'housing' definition?
I115-8	<ul style="list-style-type: none"> • <i>'The project's landscape improvements along College Avenue would remove the existing sidewalk and create a landscaped parkway with non-contiguous sidewalk featuring street side canopy trees and ground cover.'</i> - This is untrue; The project triples the width of the walkway to 12' wide at the south half of the project (south of the project's vehicular entry) then changes it to a 4' wide walkway at the north half of the project, creating an inconsistent streetscape along the main entry to the community. This project's proposed streetscape does not consider the inconsistency in streetscape frontage. This EIR is project-sided in that it does not clearly indicate the loss of median landscape as part of the project and how the median loss counters the 'enhancements' that it provides.
I115-9	<ul style="list-style-type: none"> • <i>'Circulation policies in the Community Plan are also adhered to since project improvements along the frontage would create a signalized intersection, an upgraded sidewalk experience, pedestrian linkages into the site and striping to create a bike lane. The visual character of College Avenue would be enhanced through landscape treatments and the installation of canopy trees within the parkway.'</i> The project proposes a 12' wide sidewalk...how is that considered an enhancement?...this will make for an even more urban aesthetic that is not desired by the community. Furthermore, the bike lane is designed inconsistently from south end of project through the north end of the project and does not provide any improved safety benefit as it does not reduce the number of conflicts with vehicles entering the church site. The bike lane should be located adjacent to and below the curb & gutter.
I115-10	<ul style="list-style-type: none"> • Visual assessment does not account for the reduction of landscape in the median by 2600SF (for a left turn lane and intersection). This plus the elimination of median trees that will adversely affect the visual continuity of the current scene making the visual environment more 'urban' by introducing more asphalt, removing green landscape, and adding walls within the median. Their will be a noticeable change in the visual environment. The EIR preparer should be a Landscape Architect that is trained in preparing such visual impact assessments or studies. What qualifications does the EIR preparer have?
I115-11	<p>Page 8-2 ' 8.2.2 Significant Impacts of the Proposed Project'</p> <p>Greater emphasis needs to be provided for Community Outreach and what the Community desires as this project is located at a prominent location at the entry to the Del Cerro Community.</p>

I115-5

Synchronization of traffic signals along the College Avenue corridor is not a recommended circulation improvement in the LMA As stated in DEIR Chapter 3 and Section 7.1.12, a new traffic signal would be constructed at the main ingress/egress to the church/sanctuary site and a second right in-right out driveway would be installed north of the signalized intersection. Defined as a "small project" in the Vehicle Miles Traveled (VMT) Assessment screening criteria in the City's Transportation Study Manual, the project is presumed to not result in significant transportation impacts, as discussed in DEIR Section 7.1.12. Refer to the transportation Master Response 5 regarding VMT, LMA and the College Avenue operational changes.

I115-6

Refer to Master Response 5 regarding VMT and the College Avenue operational changes.

I115-7

As stated in Master Response 3 under land use policy consistency and stated in DEIR Chapter 3 and Section 5.1, the project requires the approval of a Community Plan Amendment to add a "church" use to the Other Facilities Map in the Community Plan, as is the case for other religious institutions in the community. Neither the General Plan nor the Navajo Community Plan provides a separate land use designation for churches or places of religious assembly. Additionally, the proposed bike project would retain the Single Family residential land use designation on the Navajo Community Plan Land Use map (Figure 4) and the implementing residential zone. Pursuant to San Diego Municipal Code Section 126.0602 (a) (2), a Planned Development Permit (PDP) allows for a use that "complies with the applicable land use plan but contains uses that are not permitted in the underlying base zone."

I115-8

A described in DEIR Chapter 3, the sidewalk design along the frontage of the project is based on input received from City staff. The wider 12-foot wide shared streetscape improvement would be coincident with the curb and combine pedestrian and bicycle traffic near the southern project boundary to provide a safe and effective crossing through the I-8 westbound off-ramp

Comments

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intersection. North of the signalized project entrance, the sidewalk would narrow to a five feet wide and become non-contiguous, where a new bike lane would be striped within the road to allow for cyclists to continue northbound along College Avenue. The project results in an overall increase in landscaped areas within the College Avenue right-of-way, including the addition of 32 new street trees along the project frontage where none exist today. The design is consistent with the residential street design policy and community environment landscape policy in the Navajo Community Plan, as stated in revised DEIR Table 5.1-2.

I115-9

Refer above to response to comment I115-8; no additional response is required.

I115-10

The DEIR was prepared by a qualified professional using the policies and methodologies established by the City of San Diego. Refer to Master Response 4 with regards to the issue of neighborhood character.

I115-11

Comment noted but it does not address the content or adequacy of the DEIR. No additional response required.

Comments

Responses

1115-11 (cont.) ↑
There is a 'Front Porch' project Landscape Concept Plan that has been prepared by the Front Porch Committee of the Friends of Del Cerro. The APC developers have not completed any reasonable outreach to the Community Groups in Del Cerro, especially with the Friends of Del Cerro. The need to do this outreach!

1115-12 ↓
Greater emphasis needs to be provided for 'visual impacts'. This EIR visual evaluation is inadequate.
There have not been adequate mitigation measures proposed by this project to minimize the 'urbanization' of the Del Cerro Community and streetscape frontages or medians that are within the jurisdiction

Thank,

David Preciado, RLA QSP ASLA
Landscape Architect
Del Cerro Resident
Friends of Del Cerro Board
619.887.0833

1115-12

The visual analysis in the DEIR Section 5.5 objectively applies the City's Significance Determination Thresholds to the project's design and context to conclude there would not be a significant neighborhood character impact. Refer to Master Response 5 regarding neighborhood character for further response to this issue.

Comments

Responses

3.1.3.116 Letter I116: Julie, Kevin and Kate Prichard

Letter I116

From: Julie Prichard
To: DSD EAS; Gloria, Todd (External); CouncilMember Baul Campillo
Cc: Hackett, Anthony; Platanes, Emily; Kevin Prichard; Kate Prichard
Subject: [EXTERNAL] All People's Church 636444
Date: Tuesday, October 4, 2022 7:48:56 AM

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Mayor Gloria, Councilmember Campillo and Courtney Holowach:

I116-1

Our family strongly opposes the construction of the All People's Church Project in District 7.

In addition to the destruction of the natural landscape, the impact on traffic in the area and the controversial values held by the "church" (which are not the same values mirrored by the majority in the community), **impact on the immediate area must now be reviewed in conjunction with the 115 apartment unit and retail complex being built around the corner on Del Cerro Blvd.**

Completion of these two projects will forever negatively impact the charm and beauty of Del Cerro.

Julie Prichard
Kevin Prichard
Kate Prichard

5570 Del Cerro Blvd
619-964-7221

I116-1

The DEIR evaluates the project's potential for significant impacts to the existing landscape of the site (Section 5.5) and transportation (Section 7.1.12). Refer to Master Response 6 related to general opposition to the project, while Master Response 5 provides detail regarding how the VMT analysis is used to address both direct and cumulative impacts, consistent with the Office of Planning and Research guidance for assessing transportation impacts under CEQA. Also refer to Master Response 2 regarding cumulative impacts.

Comments

Responses

3.1.3.117 Letter I117: Barbara and Jim Recht

Letter I117

DSDEAS@Sandiego.gov

Reference: Project Name-All Peoples Church
Project No. 636444
SCH No. 2021100394
Community Plan Area: Navajo
Council District: 7

ENVIRONMENTAL IMPACT REPORT...

I117-1 | Consideration of the following issues are appropriate

○ Ingress and egress to the Church site. Church has proposed approximately 600 fixed seats in the Sanctuary. Plus additional activities on weekdays. All will significantly affect traffic on College Avenue. They are proposing an on site, curb-cut end driveway plus a traffic signal, providing access, to and from, College Avenue. College Ave. is a major access road to Interstate 5. It connects San Diego neighborhoods and important neighborhood services, north and south of the freeway, as well as SDSU. An additional traffic light in this location would amount to four traffic signals in a quarter of a mile and eight traffic signals from Del Cerro Blvd. to El Cajon Blvd.

They have to find a solution for north and south ingress and egress. I can't imagine that CalTrans would allow this.

I117-2 | ○ Traffic surrounding church location will negatively affect blocks crossing College Ave. These blocks are narrow and full of parked cars from residents. Currently, This situation makes two way traffic difficult, causing traffic to find a place to pull along the curb to allow cars from the opposite direction to pass. More traffic on these streets will exacerbate this problem.

I117-3 | I believe. These two situations will result in 'accidents waiting to happen'. Please consider these issues and how they affect thousands of households.

Barbara and Jim Recht
6350 Lambda Drive
San Diego, CA 92120

I117-1

The All People’s Church proposes a 900-seat sanctuary space with accessory uses (i.e., Sunday school classrooms, offices, and a multipurpose room/gym), as described in DEIR Chapter 3. The trip generation estimates that the project would generate 280 ADT, with 31 a.m. trips and 107 p.m. trips during the week and forecasts that the church would generate 1,976 ADT on Sunday when services are scheduled. The forecasted Sunday trip estimate is based, in part, on actual traffic counts taken at the three services offered at the church’s existing smaller location at 5555 University Avenue in San Diego, as adjusted for the proposed 900-seat capacity at the new location. Refer to the transportation Master Response 5 on trip generation. With the proposed traffic signal, median changes, sidewalk, and bike lane improvements outlined in FEIR Chapter 3, the project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system and no additional off-site improvements would be required. Caltrans provided input during the project review phase at the City. Their concurrence with the project access is noted in their comment letter (refer to letter A1).

I117-2

Based upon the transportation Vehicle Miles Traveled (VMT) Assessment, the project is presumed to have a less than significant traffic impact. Refer to Master Response 5 regarding VMT and the College Avenue operational changes.

I117-3

With respect to transportation safety, refer to Master Response 5 regarding the LMA. The project would not conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle, and pedestrian facilities as demonstrated in the VMT screening (DEIR Appendix K). Refer to Master Response 5 regarding general opposition to the project.

Comments

Responses

3.1.3.118 Letter I118: Mark Remer

Letter I118

From: Bucky Reed <buckyreed@gmail.com>
Sent: Sunday, October 9, 2022 9:08 AM
To: DSD EAS <DSDEAS@saniego.gov>
Subject: [EXTERNAL] Regarding the All People's Church project (636444)

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

I118-1 | Please do NOT allow this terrible idea to move forward. This project will create a traffic nightmare for the residents of Del Cerro. There are better sites for a project like this other than right next to our freeway access. This will destroy the nature of our peaceful neighborhood and lower our property values. There is no compelling reason for this church to meet at this location. The Rock Church in Pt Loma created a terrible ongoing traffic and parking situation for the residents of Liberty Station. This project will cause the same unnecessary headaches.

Sincerely,

Mark Remer

I118-1

Refer to Master Response 6 regarding general opposition to the project.

Comments

Responses

3.1.3.119 Letter I119: Stacy Roberts

Letter I119

From: Stacy Roberts <stacyroberts@earthlink.net>
Sent: Sunday, October 16, 2022 9:26 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Prjct No. 636444

Courtney Holowach, City of San Diego DSD, 1222 First Ave MS501, San Diego, CA 92101

Project Name: All Peoples Church
Project No. 636444
SCH No. 202110394
Community Plan Area: Navajo
District 7

I119-1 After reviewing the EIR identified above, I have concerns regarding the quality and validity of the report. The intent of All People’s Church is to grow their congregation and financial base exponentially larger than they are currently. All assumptions used for the report are based on current Church activities and unrealistic forecasts that are not based on facts related to realistic growth. For example, the traffic patterns are based on the church’s current site patterns. However, the square footage, staff, daily activities and projected patronage of the proposed site are exponentially larger than the current site. Therefore, use of the current activities as proposed is grossly negligent. Throughout the report there is continued reference that there will only be a large volume of activity on Sunday. However, the building plan includes more than 10 classrooms for preschool use that pastor has been very vocal about during public meetings. He has said on multiple occasions that he intends to operate a large preschool once the facility is built. Additionally, he has touted how the facility will have parishioners there daily, for activities including things like basketball. The proposed report does not accurately reflect the intended use of the site as articulated through public meetings held and attended by City of San Diego staff. Obviously, the exclusion of intended use and activities from the EIR is unreasonable, intentionally misleading, and not evaluating that intended use identified in public meetings is beyond negligent. The current EIR fails to objectively evaluate the impact on the neighborhood and the Citizens of San Diego. As a result, I have several fair and reasonable questions that I request be answered by the City and All People’s Church regarding their evaluation of the EIR:

I119-2 Regarding Streets:
* Are the planned mitigation reasonable, verifiable and defensible (not arbitrary)

Streets?
* * Intersection Controls

I119-1

These comments provide no specificity as to why the DEIR analysis is invalid. The impact analysis in DEIR Chapters 5, 6, and 7 assesses the project that is contained in the application to the City. Conjecture on potential uses beyond what has been proposed by the applicant are speculative in nature and not reflective of the application, design and site plan submitted to the City and the project analyzed in the DEIR.

I119-2

This comment poses a series of general traffic questions that are not specifically linked to the adequacy of DEIR Section 7.1.12. No mitigation measures were deemed necessary to address vehicle miles traveled (VMT) impacts as the project was presumed to result in less-than-significant impacts.

Comments

Responses

<p>1119-2 (cont.)</p> <p>How does this advance City complete streets policies? Accident Potential – for all road users Sidewalks (analysis?) Safety of existing condition vs buildout? Adequacy of current sidewalks? Projected demand increase (reasonably foreseeable impact of nearby proposed density)? * * Bike Lanes</p> <p>Safety of existing condition vs buildout? Adequacy of current lanes? Projected demand increase (reasonably foreseeable impact of nearby proposed density)? * * Parking</p> <p>Peak Hour impact? Worst Case impact? RoW Easements / IOD? Maintenance Perpetual Road and Landscape Maintenance funding? Irrigation? Where is the evaluation?</p> <p>1119-3</p> <p>Compatibility Cumulative impacts of planned and reasonably foreseeable density—where is the evaluation? Best use of land? Most sustainable use? EIR alt? Most considerate use? EIR alt? Social Equity or Sustainability? Does this help with housing and park needs? Community Benefit? Why should the community support this? Natural Benefit? Mitigation or off-set? Opportunity Costs? Neighborhood Transit hub? Pedestrian and bike corridor? Adequacy of the Caltrans overpass to accommodate safe crossing by students? During all hours All times of the year</p>	<p>1119-3</p> <p>This comment poses a series of general questions that are not specifically linked to the adequacy of the DEIR. Refer to Master Response 2 on cumulative impacts. Refer to DEIR Section 8.1 for a discussion of the reasonable range of alternatives considered for the project. Master Response 3 addresses the residential housing policy of the City as it relates to the project site. Both pedestrian and bicycle improvements are proposed along the frontage of the project site, as described in DEIR Chapter 3.</p>
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Comments

Responses

3.1.3.120 Letter I120: Sheryl Schultz Rose

Letter I120

From: Sheryl Rose <sherylrose@cox.net>
Sent: Sunday, October 16, 2022 6:19 PM
To: DSD EAS <DSEAS@sandiego.gov>
Subject: [EXTERNAL] All People's Church

October 15, 2022

Project Name: All Peoples Church
Project Number 636444

Dear Courtney Holowach
City of San Diego Development Services Center
1222 First Ave., MS 501
San Diego, CA. 92101

I120-1 This email concerns the All People's Church EIR in the Del Cerro area of San Diego. I attended a recent Zoom meeting regarding the EIR, and have gone to the website to read their proposal. There are several concerns many of us have about this proposed development. Our main concerns are devastation to the wildlife and natural area with such a massive project that develops or paves over 90-95% of the four or so canyon acres; traffic, traffic, traffic; and, a project of size and scope not in keeping with the original plan, zoned or otherwise, for housing, which adds nothing to the community in the way of taxes or housing.

1. What is this drive to pave over any natural areas in San Diego? This is devastating to the our unique and natural wildlife which flourishes in this canyon. Believe me there are a lot of creatures who make their home there. We know because they frequent our yard: hawks, heron, raccoons, rabbits, skunks, opossum, coyotes and bobcats. All will be greatly impacted. As well, the area provides foliage which helps to keep our air clean and provides oxygen to counteract global warming and the freeway cast-off exhaust. All People's plan to provide trees along the concrete and vines on the two level parking in no way restores this natural habitat. There are currently many empty mall and other spaces already paved over and empty (Mission Valley's historically saved Macy's, for one, Grossmont Center, Parkway Plaza, etc., etc., etc.), with ready parking, and entry and exit freeway easy, and ready for a neon cross. The claim from All People's that there are no other options for them if this site doesn't happen is simply disingenuous.

I120-1 2. The Church claims that there need be no mitigation to traffic during weekdays because they estimate they will be under the "Impact" level of 300. Their claim of 280 cars weekday traffic is "unadjusted", which means that they are basing their levels on their current much smaller site. Amazing! Just under the threshold! How can that be? Because it's not true. Because their goal is to gain members and grow. They claim there will be no school there, but who knows? They can be planning that and simply not say, right? Who will hold them to these claims? What about big events, holiday services, concerts? Sky's the limit. No where is a clear truthful number of patrons listed. If this were true, why build a two-level parking lot? The weekend traffic alone is unacceptable: up to 2,000 cars on weekends for a 900 seat church. Not a "Mega Church"? Their comparison with the Temple is a false comparison, as well. The number of members, services, and parking available there is probably 1/4 of what the Church is contemplating. And St. Therese is miles from this site and not in an already congested area and not in need of a two story parking garage, so it is not relevant either.

I120-1

The project site is not a pristine wilderness or dedicated open space or even a planned open space or park. Instead, it is a vacant parcel that has been previously disturbed by the construction of developments on all sides of the property, including I-8, College Avenue and the adjacent residential neighborhood, based on reviews of historical aerial photographs. In addition, the property is planned for future development in both the General Plan and Community Plan and is zoned residential. Due to its past disturbances and suburban location surrounded by urban development and regional infrastructure (i.e., College Avenue and I-8) the quality of on-site habitat is poor and isolated from regional open space systems, as documented in the biological resources technical report (DEIR Appendix C) and summarized in DEIR Section 5.2. Project impacts to biological resources would be potentially significant but mitigated to less than significant as explained in DEIR Section 5.2. Also refer to Master Response 1 related to alternative locations and uses.

I120-2

The DEIR assesses the project that is contained in the application to the City. The amount of traffic to be produced by the project was developed using the City's Transportation Study Manual methodologies, as stated in Master Response 5 regarding trip generation. Conjecture on potential uses beyond what has been proposed by the applicant are speculative in nature and not reflective of the application, design and site plan submitted to the City and the project analyzed in the DEIR.

Comments

Responses

1120-3 Adding another lane and light will greatly impact the traffic in this area. Getting on the freeways now is already difficult due to residents going to work, other businesses in the area, the Temple, Hearst Elementary, and a lot of congestion with SDSU. Not to mention the NEW Cerro House, 125 apartments, slated to go just above the Church on the corner of Del Cerro Blvd and College Ave. east. This is additional traffic burden is mentioned nowhere in this EIR. Del Cerro Blvd. west has ONLY ONE WAY IN/OUT to the freeway off-ramp. This is dangerous as well for fire and safety. As for public transportation, this is unlikely to be a factor unless they are talking about buses, because the Trolley is at least a mile walk up a hill and not likely to be a factor in reducing car congestion in the area. Overall, the EIR greatly underestimates the traffic congestion to this entire area the Church will bring, not to mention the years of building and construction traffic before it's even done.

1120-4 3. This is a quiet small community of mostly residential houses. This will definitely impact the character of this community, while adding nothing to it but traffic, noise, destruction of natural landscape, and pollution (no taxes or housing). While the Church claims it is in keeping with the community plan, it clearly is not. The size and scope alone are mammoth, regardless of their claim about SDSU having large buildings and this is no different. There are no buildings of that size and scope on this side of the freeway, in this community (DEL CERRO); it is again a false comparison. In one breath the Church says it will not visually impact the area, yet on the other hand their goal is to, "Place the church in a central SD location that is both visible and convenient to a regional freeway to facilitate church attendance." They want to be seen, to grow, to be a large beacon in a small area that is zoned and slated for housing, yet somehow was underhandedly sold to the Church to build this mammoth and out of character project. Again, there are plenty of other freeway easy already developed areas the Church could make their home and grow. This is not that place.

We appreciate the chance to provide our input and hope that you will consider this as being unacceptable for our established community. Please feel free to contact me if you have any questions.

Sincerely,
Sheryl Schultz Rose
5779 Theta Place
San Diego, CA. 92120

sherylrose@cox.net
619-306-3325

1120-3

Refer to the transportation Master Responses related to the Vehicle Miles Traveled (VMT) Assessment and Local Mobility Analysis (LMA), which address these comments on transportation.

The transportation analysis baseline or setting was established when the Notice of Preparation (NOP) was published in October 2021. Refer to Master Response 2 regarding cumulative impacts which elaborates on why the DEIR baseline is valid.

1120-4

Refer to Master Responses 4 and 6 regarding neighborhood character and general opposition to the project.

Comments

Responses

3.1.3.121 Letter I121: Jeffrey Rosenblatt

Letter I121

From: Jeffrey Rosenblatt <jeffrey.rosenblatt@gmail.com>
Sent: Friday, October 7, 2022 3:45 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Project No. 636444 - All Peoples Church

Dear Development Services Department,

I121-1 | I am a resident of the Del Cerro community and am writing to oppose the approval of this project.

The Environmental Impact Report shows that the residents of Del Cerro have been rightly concerned about the adverse effects this will have on our quiet community. There is already much traffic getting to and from I-8 and this development will only exacerbate this. Please reject this project.

I can be available if you should have any follow up questions.

Sincerely,
Jeffrey Rosenblatt
6118 Capri Dr, San Diego, CA 92120

I121-1

Refer to Master Response 6 regarding general opposition to the project. The project would not result in significant traffic impacts, as analyzed in DEIR Appendix K and presented in DEIR Section 7.1.12.

Comments

Responses

3.1.3.122 Letter I122: Rachel Rothman

Letter I122

From: Rachel Rothman <rerothman@gmail.com>
Sent: Tuesday, October 11, 2022 6:04 AM
To: DSD EAS <DSD EAS@sanidiego.gov>
Subject: [EXTERNAL] Comment on All Peoples Church Project

October 11, 2022

Ms. Courtney Holowach

City of San Diego Development Services Center

1222 First Avenue

MS 501

San Diego, CA 92101

Ms. Holowach,

I write to you today in reference to the Navajo Community Plan and environmental impact report: released August 31, 2022. (Navajo) All Peoples Church / Project No. 636444 / Draft Environmental Impact Report / SCH No. 2021100394.

I122-1 As a Del Cerro resident since 2015, I have seen various forms of proposed development for this land come and go. Unfortunately, the environmental impact report ignores the negative impact of traffic to neighboring residential areas.

I urge that the development activity describe in the EIR be placed on hold and that the EOIR be revised to account for the significant disruption that this project will bring, for example:

- An extra traffic signal which will bring delays to an already busy College Ave, NB and Eastbound/WB Del Cerro Blvd.
- Potential safety hazards for traffic backups from the property that extend to the exit from I-8
- A fixed amount of parking with inevitable spillover into the surrounding residential neighborhoods.

These impacts are foreseeable but unlikely to be mitigated. Based on that analysis and opinion, I respectfully urge that this project go no further.

Sincerely,

Rachel Rothman

Del Cerro

I122-1

The DEIR addresses the project's effects on transportation in Section 7.1.12; no significant impacts are presumed to occur based on the Vehicle Miles Traveled (VMT) Assessment conducted on the project. Also, refer to Master Response 5 regarding the College Avenue operational changes. CEQA does not require an environmental analysis of parking; no parking spillover into the community is not anticipated because the proposed parking supply would exceed City requirements. Traffic safety impacts are not anticipated based on improvements proposed by the project, as identified in the Local Mobility Analysis contained in DEIR Appendix J and noted in FEIR Chapter 3. Refer to Master Response 6 regarding general opposition to the project.

Comments

Responses

3.1.3.123 Letter I123: Daniel Saltzman

Letter I123

From: DANIEL SALTZMAN <greatsaltini@yahoo.com>
Sent: Saturday, October 15, 2022 6:23 PM
To: DSD EAS <DSDEAS@sandiego.gov>
Subject: [EXTERNAL] Project no. 636444

I123-1 As a Del Cerro homeowner, I oppose Project no. 63644. A quiet residential neighborhood is the wrong place for a mega church. All Peoples Church would ruin the peace and calm of the neighborhood.

>> Sincerely,
>>
>> Daniel Saltzman, Psy.D.
>> 6034 Lancaster Drive
>> San Diego, CA 92120

I123-1

Refer to Master Response 6 regard general opposition to the project.

Comments

Responses

3.1.3.124 Letter I124: Diana Sanderson

Letter I124

From: Diana Sanderson <dianasanderson@cox.net>
Sent: Sunday, October 16, 2022 5:12 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] ALL PEOPLES CHURCH/No. 636444

To Whom it May Concern:

I124-1 I am a resident in the neighborhood behind the proposed All Peoples Church site (south of Del Cerro Blvd, west of Madra). I am opposed to any Community Plan Amendment to modify the Navajo Community Plan. There are currently at least twenty (20) churches/religious in the 92120 zip code. Why should the plan be amended to accommodate another site for such a large facility? As we exit the hushed roads of the past few years of Covid, this will negatively affect traffic in our neighborhood. Access will not be limited to Sunday worship if other events during the week are scheduled, and why wouldn't they maximize use of a proposed site of this size?

I respectfully request that the City NOT allow a CPA to modify.

Thank you for your consideration,
Diana Sanderson

I124-1

Refer to Master Response 6 regard general opposition to the project.

Comments

Responses

3.1.3.125 Letter I125: Abel Santana

Letter I125

Abel Santana
6025 Madra Avenue
San Diego, CA 92120

October 17th, 2022

City of San Diego Development Services Center
ATTN: Courtney Holowach
1222 First Avenue
MS 501
San Diego, CA 92101

RE: Comments on Draft Environmental Impact Report
Project Name: All Peoples Church
Project No.: 636444

To whom it may concern,

I125-1 The Draft Environmental Impact Report ("Draft EIR") dated August 31, 2022, for the "All Peoples Church" project 636444 is inadequate with respect to several issues as it relies upon conflicting information and incomplete data. These deficiencies have caused the City of San Diego ("City") to underestimate the significance of the Project's environmental impact on the community.

The Draft EIR relies upon outdated, incomplete, and inadequate information to underestimate potential significant impacts the project will have on the community. In doing so, the Draft EIR also incorrectly concludes that the project's impacts are not cumulatively considerable.

The City must collect additional information regarding the potential impacts associated with implementation of the project before finalizing the environmental impact report. Specifically, authorities must address the following topics and questions raised in this letter.

- I125-2
 - Neighborhood: Cumulative Impacts & adequacy of the proposed mitigations
 - o Traffic Study
 - Peak Hour Use Every Day?
 - Worst Case Use Every Day?
 - Signal Performance - Del Cerro & College
 - Intersections / Controls
 - Speeding?
 - Accident count at west bout 8 exit and college at yields?
 - o Circulation
 - Per Movement / Signal Warrants
 - Traffic Signal vs. Roundabout
 - Transit Opportunities (feasibility/practicality of use of all modes)
 - Safety of cross 8 on foot
 - o Traffic Impacts
 - VMT Study & Mitigations
 - Series 14 adequacy - removal of RTP RUC / viability of analysis to support GHG reductions with increase in traffic in urban neighborhoods and development near transit
 - Are the planned mitigation reasonable, verifiable and defensible (not arbitrary)?

I125-1

The comment provides no specificity or evidence with regard to the incompleteness of the DEIR. The DEIR analysis was based on the most recent and readily available data and project specific documents prepared for the project. Refer to Master Response 2 related to the cumulative impact analysis in DEIR Chapter 6. Refer to response to comment I125-2 through I125-10 for additional responses.

I125-2

This comment poses a series of general questions that are not specifically linked to the adequacy of the DEIR. Each of these transportation facilities topics is addressed in the DEIR Section 7.1.12 and the DEIR Technical Appendices J and K. Refer to Master Response 2 on cumulative impacts. Refer to DEIR Section 8.1 for a discussion of the reasonable range of alternatives considered for the project.

Comments

Responses

I125-2 (cont.)	<ul style="list-style-type: none"> o Streets <ul style="list-style-type: none"> ▪ Intersection Controls <ul style="list-style-type: none"> • How does this advance City complete streets policies? • Accident Potential - for all road users ▪ Sidewalks (analysis?) <ul style="list-style-type: none"> • Safety of existing condition vs buildout • Adequacy of current sidewalks • Projected demand increase (reasonably foreseeable impact of nearby proposed density) ▪ Bike Lanes <ul style="list-style-type: none"> • Safety of existing condition vs buildout • Adequacy of current lanes • Projected demand increase (reasonably foreseeable impact of nearby proposed density) ▪ Parking <ul style="list-style-type: none"> • Peak Hour • Worst Case o RoW <ul style="list-style-type: none"> ▪ Easements / IOD? ▪ Maintenance <ul style="list-style-type: none"> • Perpetual Road and Landscape Maintenance funding? • Irrigation
I125-3	<ul style="list-style-type: none"> o Safety <ul style="list-style-type: none"> ▪ Community Safety Study <ul style="list-style-type: none"> • Neighborhood Security & Crime • Safe Routes to School / Use of School Grounds as Park for Neighborhood ▪ Fire & Emergency Response Study <ul style="list-style-type: none"> • On Site • Through College with peak traffic • Secondary Access • Dead-End Road Length • Evacuation Plan • Neighborhood Emergency Plan • Increase ignition risk of placing development in open space
I125-4	<ul style="list-style-type: none"> • Hydrology During Construction and after Developed building and parking is in place. <ul style="list-style-type: none"> o Primary and Secondary Treatment - 0 offsite flow is the requirement o Irrigation / Water Use
I125-5	<ul style="list-style-type: none"> • Bio <ul style="list-style-type: none"> o Survey dates/times/findings - proposed mitigation (must be verifiable) o Site full restoration potential vs. existing vs. proposed o Remediation - soils samples (is there existing waste impacts to habitat) o Disturbance/proximity to habitat / corridors o Vegetation mix - rare?
I125-6	<ul style="list-style-type: none"> • Visual <ul style="list-style-type: none"> o Gateway to community - opportunity, not just a development o Consistency with existing architecture o Compatibility with adjacent religious use (size, signage, use) o Use of religious symbols - should be proportional to adjacent religious use o Hillside compatibility - visual impact of road (next to another road) and building o Proximity to the University - does it share a similar look and feel? o Landscaping - center median & site (water use and maintenance obligations)
I125-7	<ul style="list-style-type: none"> • Compatibility

I125-3

This comment poses a series of general questions that are not specifically linked to the adequacy of the DEIR. An intersection safety analysis conducted as part of the Local Mobility Analysis (LMA), as described in DEIR Section 7.1.12. Fire service and emergency response is evaluated in DEIR Section 7.1.11. The project site plan has been reviewed by City engineering and fire/rescue department staff for consistency with the engineering requirements outlined in the City regulations. Wildfire risk is evaluated in DEIR Section 7.1.15. In all cases, the project's impacts to safety would be less than significant.

I125-4

DEIR Section 7.1.7 addresses the project's impacts on hydrology. The project includes the use of biofiltration systems to treat onsite surface drainage. Standard construction methods would be followed to reduce downstream water quality impact. No significant impacts to hydrology during construction or post-construction were identified for the project.

I125-5

DEIR Section 5.2 addresses the project's impacts on biological resources which would be mitigated to a level less than significant through measures identified in the DEIR and assured through a permit condition of approval, in accordance with the City Biology Guidelines.

I125-6

Refer to Master Response 4 related to neighborhood character.

I125-7

These comments pose a series of questions that are not linked to the adequacy of the DEIR; refer to response to comments I125-1 through I125-6.

Comments

Responses

1125-7 (cont.)

- o Cumulative impacts of planned and reasonably foreseeable density
- o Best use of land?
- o Most sustainable use? EIR all?
- o Most considerate use? EIR all?
- o Social Equity or Sustainability? Does this help with housing and park needs?
- o Community Benefit? Why should the community support this?
- o Natural Benefit? Mitigation or off-set?
- o Opportunity Costs? Neighborhood Transit hub? Pedestrian and bike corridor?
- o Adequacy of the Caltrans overpass to accommodate safe crossing by students?
 - During all hours
 - All times of the year

1125-8

- Alternatives to Consider
 - o 2-acre dedicated parkland property - Community Park
 - o No project - dedicate to City
 - o Outdoor facility - no building needed/gathering space only

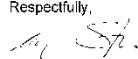
1125-9

- Outstanding Questions:
 - Are transit connections readily available to its congregation? How?
 - "a church-owned property that has proximity to its existing congregation, including its members in City Heights, Mid-Cities, College Area, and Del Cerro." How is it known these people will travel? How will they travel? Has any data been collected?
 - How are the structures and site improvements to be sensitive to the existing topography and surrounding neighborhoods?

1125-10

At a minimum, the reports upon which the Draft EIR is based demonstrate a need for further analysis to ensure reliable data is used for the City to make an informed analysis regarding the potential environmental impact of the project. The Draft EIR fails to adequately address the true cumulative and Project-level impacts on the community.

Respectfully,



Abel Santana

CC:

Raul Campillo RaulCampillo@sandiego.gov
 Martha Blake MBlake@sandiego.gov
 Anthony Hackett HackettA@sandiego.gov
 Todd Gloria MayorToddGloria@sandiego.gov

1125-8

Per CEQA Section 15126.6, an EIR shall describe a range of reasonable alternatives to the project which would feasibility attain most of the basic objectives of the project, in accordance with the CEQA Guidelines Section 15126.6, *Consideration and Discussion of Alternatives to the Proposed Project*. The alternative land uses and projects listed in this comment do not meet any of the applicant's project objectives, and therefore, are not considered reasonable or feasible. Refer to Master Response 1 regarding alternative locations or uses.

1125-9

Various modes of transportation are available in the project vicinity as stated in the Local Mobility Analysis (LMA) contained in DEIR Appendix J. Metropolitan Transit System lists Bus Routes 14 and 115 within a 0.5-mile walking distance from the project access. There are four bus stops within the 0.5-mile walking distance, with two on College Avenue just north of Del Cerro Boulevard, and two on College Avenue just south of Alvarado Road. Additionally, the San Diego State University trolley station is within a 1-mile walking distance of the project pedestrian access point. The Alvarado Road trolley station is over a 1-mile walking distance from the project site. Both stations are served by the Green Line trolley service operated by Metropolitan Transit Service (MTS). Refer to Master Response 4 regarding neighborhood character which addresses the project's design and its consistency with policies and standards.

1125-10

These comments are general in nature and provide no evidence that the DEIR is inadequate, including direct and cumulative impacts. Refer to Master Response 2 on cumulative impacts for additional discussion.

Comments

Responses

3.1.3.126 Letter I126: Mark Sauer and Donna Valerie

Letter I126

From: Mark Sauer <marksauer2@gmail.com>
Sent: Wednesday, October 12, 2022 5:06 PM
To: DSD EAS <DSD EAS@sandiego.gov>
Subject: [EXTERNAL] All People's Church, Project No. 636444

Dear Courtney Holowach:

Please see attached comment regarding the above referenced project.

Mark Sauer
Donna Valerie

Nov. 12, 2022

To: Courtney Holowach
Development Services Dept., City of San Diego

Re: All Peoples Church, Project #: 636444

I126-1 We have been homeowners in Del Cerro for 35 years. We have serious concerns about the environmental impact of this project on our community.

Traffic at the intersection of College Ave. and Del Cerro Blvd. south to Interstate 8 is already heavy at various times and problematic. Traffic from this area is currently impacted by SDSU to the south, Hurst Elementary just west of the intersection and the Temple Emanu-El across College Blvd., opposite the proposed site of All Peoples Church, and the Windmill Farms shopping center just north of the site. There is not only considerable vehicular traffic, but also pedestrian traffic to and from the school as well as bicycle and pedestrian traffic south across I-8 to SDSU. Adding hundreds of cars to this mix is unacceptable to those of us who rely on this access to our community and I-8. The argument that traffic from the proposed church would only have impact on Sunday fails, since there will obviously be programs throughout the week drawing hundreds of congregants.

There clearly will be health and safety impacts given the enormous increase in vehicular traffic to and from the proposed church along the various streets

I126-1

These comments describe existing traffic conditions in the project area but do not address the adequacy of the DEIR. Only 5 percent of the project's trips would travel through the College Avenue/Del Cerro Boulevard intersection, as shown in the Local Mobility Analysis (LMA). The safety analysis conducted at that intersection as part of the Local Mobility Analysis determined that no improvements were warranted at that location (refer to DEIR Appendix J for details). The DEIR Section 7.1.12 correctly concludes that the project is presumed to not result in significant transportation impacts. Refer to Master Response 5 regarding VMT, LMA and College Avenue operation changes. Energy demands associated with the project would be minimized through compliance with energy conservation measures in the City's Climate Action Plan and California Building Code and would not be excessive as described in DEIR Section 7.1.3, resulting in less-than-significant impacts.

Comments

Responses

- 1126-1 (cont.) ↑
surrounding it. Plus, adding another traffic signal between I-8 and the existing signal at Del Cerro Blvd. will further back up traffic in all directions.
- The mega-church structure itself will consume enormous amounts of energy as hundreds (more than a thousand?) congregants gather for services and other activities.
- 1126-2 | Del Cerro has multiple hillsides and canyons; wildfires are a constant threat (in fact, there was a significant wildfire just south of this site along I-8 within the past couple of years). Egress from Del Cerro is limited, and adding hundreds of cars to the mix in an evacuation emergency heightens the danger for everyone living nearby.
- 1126-3 | Adding hundreds of cars day after day into our community will certainly impact air quality in the neighborhood. Impact on air quality will be profound during construction, with heavy equipment and dust, plus noise pollution.
- The project will also generate excessive noise on a day to day basis from vehicles and events, especially for the many homes adjacent to the project and the community shopping center just to the north.
- 1126-4 | The several acres being considered for development would be far better suited to homes, as was originally planned. San Diego is in the midst of a severe housing shortage. Adding homes would be directly in keeping with the nature of the community.
- 1126-5 | Del Cerro is a quiet, well-established, family-oriented neighborhood. There is a good reason the Navajo Planners have zoned this area as residential. This project is a terrible fit for the neighborhood. A project with a 53,000-square-foot building and two-level parking structure with enormous signage is unseemly in our neighborhood. It will have a profound negative impact on the community.

Thanks for your consideration:

Donna Valerie and Mark Sauer
5875 Overlake Ave., San Diego, Ca. 92120

1126-2

DEIR Section 7.1.16 addressed emergency evacuation plans and determined the project would not interfere with any emergency response along College Avenue and less-than-significant impacts would occur.

1126-3

DEIR Section 7.1.1 addressed the project's construction and operational air quality emissions and concluded that impacts would be less than significant. Likewise, the DEIR addressed all anticipated operational noise sources and their potential for impacts to the nearby residential community and concluded that impacts would be less than significant.

1126-4

Building housing is not a project objective identified in DEIR Chapter 3. As analyzed in the environmental document for the prior entitlement for a 24-unit residential development, a housing project would not avoid the significant impacts of the project (refer to DEIR Chapter 8, *Project Alternatives*). Refer to Master Responses 1 and 6 related to alternate location/use and general opposition to the project.

1126-5

Refer to Master Responses 4 and 6 related to neighborhood character and general opposition which address these comments.

Comments

Responses

3.1.3.127 Letter I127: Amy Schindler

Letter I127

From: Amy Schindler <amyjuneschindler@gmail.com>
Sent: Saturday, October 8, 2022 10:13 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] All People Church/No. 636444

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

1127-1 | To City of San Diego Development Services,
I have been a home owner in Del Cerro for 34 years and I feel allowing the All People Church to build a brand new megas church is a terrible idea. It will impact our community in so many negative ways- traffic, pollution and effect privacy for the surrounding homes. There are many empty department stores around San Diego like Macy's in El Cajon Parkway Mall and Frys off the 15 highway that would be a much better alternative. Thank you for considering my opinion
Mrs Amy Schindler

Please excuse any errors. Sent from my iPhone.

I127-1

Refer to Master Responses 1 and 6 related to general opposition and alternate site selection.

Comments

Responses

3.1.3.128 Letter I128: Mark Schulze and Patty Mooney

Letter I128

From: mark@crystalpyramid.com <mark@crystalpyramid.com>
Sent: Tuesday, October 11, 2022 2:14 PM
To: DSD EAS <DSD EAS@sanidiego.gov>
Cc: patty@crystalpyramid.com; markschulze@cox.net
Subject: [EXTERNAL] No go... All Peoples Church #636444

Please help stop this bad project.

I128-1 We are again writing today in regards to the All Peoples Church that is proposed to be squeezed into a piece of land that seems like an after-thought in an otherwise lovely community Master Plan.

We drive past that spot several times a week. And lately, when we drive past, we say to each other, "This is the LAST place they should erect yet another mega-church." It's not like we need MORE traffic, and yet, that's what this plan would amount to.

At a time when more people are beginning to question their faith, and the force of religion in our political lives, instead of ramping up the construction of more churches, let's consider having LESS churches and more of Nature.

And we also take issue with the idea that anything needs to be built there at all. It's got to be either a housing development or a mega-church. Why? Our Del Cerro neighbors have been very clear that they consider this an invasion of their quiet neighborhood. We could not agree more. The idea that the All Peoples Church is evangelical in nature and purportedly supports Gay Conversion Therapy should be all you need to know to deny this project.

Let's use the land as a park or garden area to help make the area better not worse with more bad church's or more traffic too...

Mark Schulze & Patty Mooney

Crystal Pyramid Productions

7323 Rondel

San Diego, CA. 92119

619-644-3000

I128-1

Commenter submitted previous comment, which has already been responded to herein. Refer to the responses to comments for letter I105.

Comments

Responses

3.1.3.129 Letter I129: Noah Schuster

Letter I129

From: Noah Schuster <noah.o.schuster@gmail.com>
Sent: Sunday, October 16, 2022 3:46 PM
To: DSD EAS <DSDEAS@san-diego.gov>
Subject: [EXTERNAL] Public comment on All Peoples Church/No 636444

Hello,

I129-1 I am a registered voter and a resident of Del Cerro/Navajo Community Plan Area and I would like to submit the following as a public comment on the Draft Environmental Impact Report regarding the project All Peoples Church, project no. 636444.

The Draft Environmental Impact Report regarding the project All Peoples Church, project no. 636444, has determined that the proposed project would result in significant environmental effects in the following areas: biological resources, historical resources, noise, and Tribal cultural resources. It is vital that the site of the proposed project remain vacant in order to avoid the significant environmental effects in the aforementioned areas. I do not think that constructing a megachurch and huge parking structure are worth the significant environmental and Tribal cultural destruction that would necessarily occur if the project were to proceed, even at a reduced project level. Please reject this project in its entirety. It will not serve the residents of this community, and it will only cause further environmental destruction and loss of significant historical and Tribal cultural resources.

Signed,
Noah Schuster
5917 Overlake Ave
San Diego, CA 92120

I129-1

As discussed in the DEIR Chapter 5, all of the potential projects impacts to biological resources, historical resources, noise and tribal cultural resources identified for the project would be reduced to a level below significance with implementation of the identified mitigation measures. The project site is planned for future development under the General Plan, Community Plan and zoning regulations. Refer to Master Response 6 related to general project opposition.

Comments

Responses

3.1.3.130 Letter I130: David Schwartz

Letter I130

From: David F.Schwartz <dfschwartz@gmail.com>
Sent: Saturday, October 15, 2022 10:28 AM
To: DSD EAS <DSDEAS@sandiego.gov>
Cc: CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; Councilmember Jennifer Campbell <JenniferCampbell@sandiego.gov>; Councilmember Stephen Whitburn <StephenWhitburn@sandiego.gov>; Councilmember Monica Montgomery Steppe <mmontgomerysteppe@sandiego.gov>; CouncilMember Marni von Wilpert <MarnivonWilpert@sandiego.gov>; CouncilMember Raul Campillo <RaulCampillo@sandiego.gov>; CouncilMember Vivian Moreno <VivianMoreno@sandiego.gov>; CouncilMember Sean Elo-Rivera <SeanEloRivera@sandiego.gov>; Holowach, Courtney <CHolowach@sandiego.gov>; Blake, Martha <MBlake@sandiego.gov>
Subject: [EXTERNAL] PUBLIC COMMENTS: All Peoples Church / No. 636444

To The City of San Diego:

I130-1 We are thirty-three year residents of Del Cerro and are writing to voice our strong opposition to the project known as the All Peoples Church. We find the Environmental Impact Report (EIR) lacking for a number of reasons which we will articulate as briefly as possible.

In 8.4.1.1 and 8.4.2.1 the report indicates that the proposed site of the church is not a designated view corridor and that there would be no impact to a designated scenic vista if the project is completed. This is somewhat circular reasoning and suggests that open space, in and of itself, is not a scenic resource. We respectfully disagree.

Del Cerro is a relatively sleepy, peaceful, residential neighborhood. The Community Plan ensures that it will stay that way. The proposed site provides a natural, unobstructed, uncluttered expanse which is consistent with the nature of the community. It gives a sense of distance from highway. That has value to the residents which will be destroyed by using the open space for a large project.

Del Cerro is not highly developed and the residents, by a wide margin, do not want it to be highly developed. Filling a canyon with a 54,476 square foot church and 71,010 square foot parking structure changes the visual quality and neighborhood character in ways which the EIR simply does not address. The fact that the location isn't a designated view corridor does not mean that the location doesn't provide a view.

That area is, in some ways, the "front porch" of the community. We are a quiet, somewhat concealed neighborhood, tucked away in central San Diego, one of the most desirable communities in the city. Approving the project will turn the area into something much busier and less desirable than what we know and love as Del Cerro. This is particularly true in light of the proposed construction of a six-story apartment complex just around the corner from the proposed church: another unwanted variation from the community plan.

If our elected representatives are unable or unwilling to protect our neighborhoods as the residents of these communities choose, then these representatives are not serving the people who elected them.

The proposed church will also significantly impact the flow of traffic into and out of Del Cerro. Although the proposal is alleged to include only minimal activity at the church during the week, it is inconceivable that the owners will not at some point attempt to use the facility to its full capacity. What is not now proposed can be added later with little to no consideration for the residents, the community, and without meaningful public input. **Therefore, we object to the approval of the project on the grounds that the reasonably foreseeable uses of the structures exceed what is represented and considered by the EIR. The willingness of the EIR to accept at face value what the developers have represented**



I130-1

Comments noted. The project alternatives discussion from DEIR Sections 8.4.1.1 and 8.4.2.1 are based on the analysis of the project's impacts in DEIR Section 5.5. As noted in under the visual effects discussion, there are no designated view corridors or scenic vistas in the project area that are identified in any of the applicable planning documents, including the General Plan and Navajo Community Plan (refer to the Regulatory Framework discussion in DEIR Section 5.5.2). Both plans identify the site for residential use in the future. Views of the site from the freeway, trolley and local roads are noted under the public views discussion in Section 5.5.1.3. Although the site is recognized in the DEIR as currently vacant undeveloped land, it is not designated as scenic open space nor is College Avenue a designated view corridor in the planning documents. When applying the City's Significance Determination Thresholds for assessing a project's impacts to scenic views, a DEIR must establish whether or not a view is from a designated view corridor. The project site is not visible from a designated public view corridor and the open space it contains is not considered significant by the Navajo Community Plan. For these reasons, the DEIR concludes that project impacts to designated public views would not be significant.

The DEIR goes on to assess the project's changes in neighborhood character (refer to DEIR Section 5.5.4) by applying the City's Significance Determination Thresholds for that topic. As discussed in DEIR Section 5.5.4, project impacts to neighborhood character would be less than significant. Refer also to Master Response 4 for additional discussion on this topic.

The transportation impacts of the project are evaluated in DEIR Section 7.1.12 and DEIR Appendix K. The capacity of the project evaluated in the DEIR is based on the application presented to the City and the CEQA Guidelines Section 15145 prohibits speculation on future programming unrelated to the application in an environmental analysis. The transportation analysis takes into account both growth in staff and congregation over time, as noted in the trip generation analysis in DEIR Appendix K and as outlined in Master Response 5. The traffic signal along College Avenue was warranted by the transportation analysis in the Local Mobility Analysis (LMA) in DEIR Appendix J. The signal will be installed by

Comments

Responses

1130-1
(cont.)

demonstrates a failure of the review process and unreasonably favors applicants who wish to deviate from a community plan for their own purposes.

We find that the EIR's assessment of traffic impact is sorely lacking in a number of respects. First and foremost, it is inconceivable that the Church does not anticipate growth of its congregation as a result of being in a larger facility. More congregants equals more revenue. **The failure of the EIR to anticipate congregation growth is a fatal flaw in the review process and represents a failure to anticipate reasonably foreseeable uses of a project which already deviates from the Community Plan. Accepting the current membership of the Church as its guide, the EIR contains, on its face, an undercounting of potential congregants and a flawed assessment of the project's impact on the community.**

Traffic on College Avenue and traffic entering and exiting Highway 8 will be significantly impacted by having a light-controlled intersection so close to the entrance and exit ramps. The westbound Highway 8 exit at College Avenue is already difficult to navigate as there is a short lane to allow traffic exiting Highway 8 to merge onto College Avenue. An intersection just off the freeway will not only make it more difficult to merge onto College, but will also result in the backup of traffic on the exit ramp and, potentially Highway 8 itself.

Notably, the light controlled intersection would have the unusual distinction of being built simply for the benefit of a single business. That is an irresponsible use of land, public funding, tax dollars, and City investment of time and resources. We are unable to identify any other light controlled intersections in this area which only serve one business.

If this project were serving the existing residents of the community, perhaps the analysis would be different. It's possible there would be more community support for it. In fact, The Local Mobility Analysis Report indicates that only about 2% of the congregation of the Church lives in the 92120 zip code. Approval of the project would run counter to the City's Climate Action Plan to reduce greenhouse gas emissions.

Additionally, in the midst of the housing crisis the City is attempting to address, it would be an act of pure hypocrisy to take this land, which is approved for a 24-unit housing development, and hand it to a church, instead. There is simply no justification for approval of a project which will have such a great impact on the community but which, because of its religious purpose, will contribute zero revenue in the form of property taxes to support itself and the surrounding community. This is especially relevant given the negligible percentage of Church members which are actually part of this community.

The City should decline to approve this project for all the reasons stated above. It's a project which isn't consistent with the community plan, would remake and redefine the entrance to our neighborhood, increase traffic congestion, run counter to the City's Climate Action Plan and attempts to address a housing shortage, and would burden the area with a business serving people who do not live in and contribute to the community.

This letter has been copied to many residents of the 92120 zip code who are invited to copy, paste, and use the contents to voice their opposition to this project and register their views as public comments.

Respectfully submitted,

David F. Schwartz
Celeste P. Schwartz
(619) 589-2440

the applicant (and not using public funds as suggested) as a condition of project approval.

The project would be consistent with the City's Climate Action Plan (CAP), as demonstrated in DEIR Section 7.1.5 and DEIR Appendix B. As demonstrated in DEIR Section 7.1.5, the project would generate less greenhouse gas (GHG) emissions than the 52 residences that are allowed on the project site under the current zone (as shown in DEIR Tables 7-7 and 7-8). In addition, the project would not result in significant GHG emissions and would be consistent with the City's CAP by complying with the GHG emissions reduction strategies outlined in the project's CAP Consistency Checklist (refer to DEIR Appendix B).

Building housing is not project objective identified in DEIR Chapter 3. Nonetheless, the 24-unit residential subdivision that was previously approved on site is described in the Reduced Residential Alternative and it would have similar significant impacts as the church/sanctuary project as discussed in DEIR Chapter 8. Economic issues, such as tax revenue, are not required to be analyzed under CEQA, pursuant to CEQA Guidelines Section 15131. The Opposition to a project is not a CEQA issue, as discussed in Master Response 6.

Comments

Responses

3.1.3.131 Letter I131: Cindy Scott

Letter I131

[EXTERNAL] All Peoples Church/No. 636444

Retention: Inbox

cindy scott <sicilycindy@yahoo.com>

To: DSD EAS

Fri 9/2/2022 6:57 PM

I131-1 My comments regarding this development are that:

1. the site is going to cause unreasonable traffic congestion on College Ave.
2. the proposed development on this site is going to detract from the neighborhood look and feel of Del Cerro
3. the proposed development is out of line with the current community plan of residential development and a variance should NOT be allowed.

I am against this proposal in whole.

I would suggest that the All Peoples Church look to build in Mission Valley by John Hines and Scottish Rite where it is zoned more appropriately.

Regards, Cindy Scott

Reply Forward

<https://outlook.office365.com/mail/DSD/EAS@sandiego.gov/deeplink?Print>

I131-1

These comments do not address the adequacy of the DEIR. Refer to Master Responses 1, 3, 5 and 6 related to transportation, general opposition, land use policy consistency and alternative location and use.

Comments

Responses

3.1.3.132 Letter I132: Kevin Sheedy

Letter I132

From: Kevin Sheedy <kcd2@cox.net>
Sent: Monday, October 10, 2022 6:03 PM
To: DSD EAS <D5DEAS@sandiego.gov>
Cc: kcd2@cox.net
Subject: [EXTERNAL] All Peoples Church 636444

To whom it may concern,

I132-1 | I am a real estate broker and I work the Del Cerro neighborhood. Apparently the draft environmental impact report determined the proposed project would result in significant environmental effects in terms of biological resources, historical resources, noise, traffic, and tribal cultural resources. I don't know what those issues are but I can tell you that the access point (DRIVEWAY) to get into that Mega Church will be horrific and cause DEATH. THE DEATH WILL BE ON YOUR HANDS IF YOU APPROVE THIS. IT MAY BE YOUR KID WHO GETS HIT WHILE VISITING DEL CERRO TO SEE A FRIEND. The access is horrible and should never be considered. People fly off the freeway right there and people will slam into other cars who try to use the driveway of the Mega Church and a left hand turn coming down College Avenue will also be where people DIE. You can bank on that and if you vote for this stupid project you will hear almost immediately upon it's opening that someone or many people died. That crappy piece of dead land should remain dead land. It should never been considered anything except dead land off a freeway exit which exist all over the city. You will also ruin property values in Del Cerro, Allied Gardens and San Carlos. There will be DEATH, and it may be your kid visiting here if you don't already live here. You will be responsible for:

Death

Death

Death



I132-1

These comments do not address the adequacy of the DEIR and provide only speculative commentary on the project's potential effects on traffic. Refer to Master Responses 5 and 6 related to general opposition and College Avenue operational changes triggered by the project.

Comments

Responses

1132-1
(cont.)

Death

Death

DEATH

DEATH

DEATH

DEATH

WE WILL SEE IF YOU GIVE A
SHIT ABOUT OTHER HUMAN
BEINGS-MAYBE YOUR LOVED

Comments

Responses

I132-1
(cont.)

↑
ONE-BY YOUR VOTE. HOW
WOULD YOU LIKE THIS CRAP IN
YOUR NEIGHBORHOOD?

Comments

Responses

3.1.3.133 Letter I133: Shannon Shepley

Letter I133

From: Shannon Shepley <shannon.shepley@yahoo.com>
Sent: Monday, October 17, 2022 4:06 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church #636444

I133-1

Hello,
I'm writing regarding the All Peoples Church project (Number 636444). I believe it will negatively effect our community in a large way. Aside from the church's name, their views seem to be far from inclusive. Our community is loving and open to all people, as well as all genders and races which does not seem to be the case for the people of that church. Their views are outdated and an embarrassment.

Beyond my opinion of the hateful stance of that church, I am concerned about the traffic the church would cause. As it is, I see a lot of accidents at that the freeway on ramp/off ramp intersection. Additionally the plans that have been proposed for new medians and lights does not take in to account the elementary school and temple children. The families who walk to the temple or to Hearst would be greatly effected during construction and during their walk to school once it is constructed. Those driving to Patrick Henry would also be caught in the congestion. The back up from SDSU is already substantial and adding a large church venue at that particular space would add to the danger of the intersection.

We moved to this community for exactly that- the community. This church would change the environment of this community completely. Please consider the congestion in Liberty Station caused by The Rock Church and vote against this project. Truly I see ZERO upside to adding a church of this magnitude, especially since so many in the community don't want it.

Thank you,
Shannon Shepley -
5830 Hampton Court, San Diego Ca 92120
619-379-8187

I133-1

Refer to Master Responses 4, 5 and 6 related to general opposition to the project, transportation vehicle miles traveled (VMT) screening, and neighborhood character.

Comments

Responses

3.1.3.134 Letter I134: Charles Sloan

Letter I134

From: [Charles Sloan](#)
To: DSD_EAS
Subject: [EXTERNAL] All Peoples Church # 636444 Del Cerro Blvd.
Date: Monday, September 12, 2022 6:54:19 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

I134-1 | This church will obviously add dangerous excess, unbearable traffic and noise pollution to the Del Cerro and San Carlos neighborhood and will be highly detrimental to everyone with the addition of 2,000 cars on Sundays as stated.
Pastor Herber is not to be trusted in any way because he steals from homeless people and we do not approve of their gay conversion techniques
Sent from my iPhone

I134-1

Refer to Master Responses 5 and 6 related to general opposition and transportation effects to College Avenue.

Comments

Responses

3.1.3.135 Letter I135: Andrew Sloter

Letter I135

From: A Slo <asloter@gmail.com>
Sent: Tuesday, October 4, 2022 5:00 PM
To: DSD EAS <DSEAS@sandiego.gov>
Subject: [EXTERNAL] All Peoples Church Proposal

To whom it may concern: or Courtney Holowach

I135-1 I completely disagree with this proposal of the All Peoples Church. I feel a church is not the right fit for the Del Cerro neighborhood. We have approximately 14 churches within a 2.5 mile radius that welcome everyone so I'm not sure how we justify another Church facility. Below I will list them all for reference.

We have **Temple Emanu-El** within one block from this proposed location and they welcome everyone. They even have musical events for anyone in a very nice quaint setting. My 99 year old mother enjoyed it there. They welcomed us with open arms and served food and drinks for free. They also offer many types of services for people. We are not of Jewish faith either. They never asked.

We have **St Therese Parish** not more than 1/2 mile away with a large events facility anyone can use.

We also have **Del Cerro Baptist Church** less than 1 mile away
We have **Ascension Lutheran Church** Located less than 1 mile away from the proposed location
San Diego Gospel Hall is on Twain Ave
Prince of Peace Lutheran Church in Allied Gardens 1.1 mile away.
There is also **New Life San Diego Church** within 2 miles of the proposed location
There's also **The Grove Church** located right across the freeway on Alvarado Rd.
Beth Jacob Congregation on College Ave 1.5 miles away
College Ave Baptist Church 1.5 miles as well
Faith Presbyterian Church near SDSU
Open Door Family Worship Center very close
Mission Trails Church very close as well
Palisades Presbyterian Church very close

So there you have it. I think affordable homes would be a better fit or a shopping center with apartments or Condominiums above. I'm not against progress, I just don't think another Church would be a good fit when we have so many others so close.

Thank you
Andrew Sloter
Home Owner
5572 Cambria Court
San Diego Ca
92120

135-1

Refer to Master Responses 1 and 6 related to general opposition, need for the project, and alternate site selection.

Comments

Responses

3.1.3.136 Letter I136: Jaime and Art Smart

Letter I136

[EXTERNAL] Fwd: 636444 (All People's Church)

Retention: Inbox

Jaime Smart <jaimep24@cox.net>
To: DSD EAS

🔒 ↶ ↷ ↸ ⋮
Fri 9/9/2022 10:30 AM

From: Jaime Smart <jaimep24@cox.net>

Date: September 9, 2022 at 10:24:59 AM PDT
To: dsdes@sanidiego.gov
Subject: 636444 (All People's Church)

To Whom It May Concern,

I136-1 | We am writing to express our vehement opposition to the construction of this church at the designated location in Del Cerro.

As a long time Del Cerro resident and homeowner, I am aware of the history behind this parcel of land. It is my understanding that it was finally approved for building several dozen residential units which is what the Navajo Community Plan allows and what it is zoned for, and which fits the character of our community. Then suddenly, the property was transferred to this church who wishes to build a 54,000 square foot church /sanctuary and 70,000 square foot two level parking garage. The timing of events seems a little suspect.

If allowed to be built, this will have a negative impact on our quiet community. Among other things, the traffic flow will be horribly disrupted. A church brings no tax revenue to support our city and infrastructure, where the proposed homes certainly would. We ask that the property only be used for residential as currently designated. After all, the state is suffering a serious shortage of housing.

Thank you,
Jaime and Art Smart

about:blank

1/1

I136-1

The prior housing development approved on site was analyzed in DEIR Section 8.4.2, and its impacts are similar to the proposed project. Refer to Master Responses 3, 4 and 6 related to general opposition to the project, land use policy consistency and neighborhood character.

Comments

Responses

3.1.3.137 Letter I137: Jaime Smart

Letter I137

From: Jaime Smart <jaimep24@cox.net>
Sent: Friday, October 14, 2022 7:01 PM
To: Holowach, Courtney <CHolowach@sandiego.gov>
Subject: [EXTERNAL] All People's Church

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Ms. Holowach,

I137-1 I am writing to express my vehement opposition to the All People's Church proposal to build a new location in Del Cerro. This is the wrong location for many reasons, including environmental and traffic concerns. This property was approved for 24 homes several years ago and was suddenly transferred to the church. This is a classic bait and switch and will not fit in to this small area of our neighborhood. San Diego is suffering a housing shortage and yet a church is being considered where 24 homes were approved to be built. Use regulations for residential zones do not allow religious assembly in RS 1/7 zoning. This must be honored. This will impact the traffic and quality of life to include property values, of so many in the surrounding neighborhood. Please put a stop to this proposal and allow the homes to be built as previously approved.

Thank you,
Jaime Smart
DCH Homeowner

I137-1

Building housing is not project objective identified in DEIR Chapter 3. Nonetheless, the 24-unit residential subdivision that was previously approved on site is described in the Reduced Residential Alternative and it would have similar significant impacts as the church/sanctuary project as discussed in DEIR Chapter 8. Commentary on the need for the project is not a CEQA topic and is addressed in a Master Response 6 to the FEIR. Master Responses 3 and 6 address general opposition to the project and land use policy consistency issues.

Comments

Responses

3.1.3.138 Letter I138: Cheryl Smelt

Letter I138

From: cdsmelt <cdsmelt@earthlink.net>
Sent: Sunday, October 16, 2022 3:42 PM
To: DSD EAS <DSD EAS@sandiego.gov>
Cc: cdsmelt@earthlink.net <cdsmelt@earthlink.net>
Subject: [EXTERNAL] Comments on Draft Environmental Impact Report regarding Project No. 636444;
Project Name: All Peoples Church

I138-1 | This email serves as my written comments to the decision-making authorities regarding the City of San Diego's Draft Environmental Impact Report dated August 3, 2022, for the "All Peoples Church Project, Project Number 636444.

I138-2 | While the EIR addresses a number of serious issues, one which concerns me considerably is increased traffic, one reason being its well-known effects on air quality (which among other health issues affects asthma and other pulmonary disorders, and cancer), as well as peoples' health in general. The traffic as it is now in terms of volume and congestion creates much air pollution although the EIR seems to suggest that the effects of exposure will not be significant even though the MEI for residents (whose numbers soon will be increased due to upcoming new apartments not far from the proposed church and existing community), and those in nearby schools, is already "9.70 of 1 million". That alone is significant. Also, what about the effects of air pollution on ALL living things such as pets, trees and other greenery?

I138-3 | In addition to other health issues such as strokes, heart attacks, and physical injuries which arise (such as in auto accidents), what effects will increased traffic have on the urgent availability of Rescue, especially in the narrow confines of the main traffic arteries in the geographical area?

I138-4 | Another aspect which concerns me regarding traffic is the increase the All Peoples Church will create in congestion which is significant already. In addition to the traffic increase when people attend services and other activities (classes, etcetera?), the Church will have, additional traffic will be created because of a proposed gym, and its sporting events. Not only will the players create an increase in traffic, but personnel and events' attendees will add to the congestion situations.

While there are numerous significant issues regarding the addition of the All Peoples Church in the immediate area, these are just two areas which become immediately apparent and of great concern to me. Please take them into serious consideration.

Respectfully,

Cheryl Smelt
Resident on Lambda Drive,
San Diego, CA

I138-1

Comment noted; no response required.

I138-2

The DEIR Section 7.1.12 studied all of the potential impacts mentioned in this comment and concluded that the project would not result in significant transportation or air quality impacts. Refer to Master Response 5 regarding the Vehicle Miles Traveled (VMT) Assessment and Local Mobility Analysis (LMA). As required by CEQA, the air quality analysis in Section 7.1.2 focused on potential impacts to sensitive receptors, such as residents, hospitals, schools, day care facilities, and senior care facilities, while pets, trees and landscaping are not considered sensitive receptors based on standard industry protocols for analyzing such impacts and the City of San Diego Significance Determination Thresholds.

I138-3

As stated in the DEIR Section 7.1.6, the project would not impair the implementation of, or physically interfere with, an adopted emergency response plan or evacuation plan. Traffic control would be implemented by the construction contractor (as required by the City) to ensure safe passage through the area while construction is occurring and to make sure emergency access is maintained in the project area. Once complete, the project would not interfere with any emergency response along College Avenue and less-than-significant impacts would occur. Refer to Master Response 5 on transportation addressing operational changes along College Avenue.

I138-4

The project trip generation assumes increases in both staffing levels and congregation that are projected to occur over time when the church relocates to the project site. The 900-seat capacity is based on the church's application to the City. The VMT screening presumes that the project would not result in significant transportation VMT impacts.

Comments

Responses

3.1.3.139 Letter I139: Lauren Sommer

Letter I139

From: Lauren Sommer <ldssommer@gmail.com>
Sent: Sunday, October 16, 2022 5:01 PM
To: Holowach, Courtney <CHolowach@sanidiego.gov>; Blake, Martha <MBlake@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church Del Cerro

Dear Ms Holowach and Ms. Blake,

I139-1 I am writing with extreme concern over the possibility of the approval of the proposed All Peoples Mega Church on the property north of Highway 8 on College Avenue. The impact this project will have on our community is immense, and frankly quite unnerving.

I139-2 The City of San Diego claims to have concerns over the lack of housing yet this property, which was already approved for a 24 unit housing project, could clearly aid with the housing crisis in our city. In other words, a vote in favor of the development of All Peoples Church Mega Project would be a "NO" vote on housing. Not only that, it would clearly reject the opinions and pleas of current area residents, taxpayers and voters' views. A vote in favor of this mega project would not only communicate your indifference to the housing issues but would also clearly convey to us that our City Representatives, Councilmembers and politicians don't hear us. A vote in favor of the Mega Church project would indicate that, once again, our representatives are on the side of big money, ignoring the consequences of how the Mega Church would take over our small community with traffic, congestion and a transient population. Would you want this built in your community?!

I139-3 In addition, there is the current Municipal Code Table 131-04B, Residential Zoning that disallows Religious Assembly in RS 1-7 Zoning which restricts "Assembly and Entertainment Uses, including Places of Religious Assembly". That too needs to be addressed and abided.

I139-4 The All Peoples Church proposal would create an immediate impact on our roads & safety and would generate a far greater residual effect on the City's Climate Action Plan.

I139-5 Our perfect little town does not want nor need the horrific impact that this church would impose on our community. It will affect our children, our housing prices, our walkability and our safety. Please remember us when you are voting. Remember we live here and do not want this Mega Church developed in our neighborhood. Please vote against this proposed development!

Lauren Sommer
Del Cerro Resident

I139-1

These comments do not address the adequacy of the DEIR. Refer to Master Response 6 related to general opposition.

I139-2

Comment does not address the adequacy of the DEIR. General opposition to the project is noted and is addressed in Master Response 6. With regard to the housing crisis, which is a non-CEQA issue, refer to Master Response 3 that addresses project consistency with residential housing policy. A General Plan Amendment is not required as discussed in Master Response 3 on land use policy consistency.

I139-3

The project would not rezone the property; residential zoning would remain intact because the City does not have a zone classification for church or religious institutions. The San Diego Municipal Code (SDMC) Section 126.0602(a)(2) allows projects to propose a Planned Development Permit (PDP) to allow a use that is permitted by the land use plan but not allowed by the underlying zone. That process is what is proposed to permit the church on a residentially zoned site. Refer to Master Response 3 regarding land use policy consistency as it relates to this comment on zoning.

I139-4

Project impacts to both transportation and greenhouse gas (GHG) emissions would be less than significant as described in DEIR Sections 7.1.5 and 7.1.12. This comment offers no evidence to the contrary. The project would be consistent with the City's Climate Action Plan (CAP) by complying with the various GHG emissions reduction strategies outlined in the project's CAP Consistency Checklist (refer to DEIR Appendix B).

I139-5

Refer to Master Response 6 related to general opposition.

Comments

Responses

3.1.3.140 Letter I140: Sabine Steck

Letter I140

From: Sabine Steck <sabine@kengina.com>
Sent: Friday, October 7, 2022 10:42 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church/No.636444

Dear City of San Diego Development Services Department,

I140-1 | We have been following this proposal to build a church in the "open space" adjacent to College avenue. This "All Peoples Church Development" has shown to have a significant environmental impact in the draft environmental impact report. We already know that traffic is getting worse on the College avenue corridor between Del Cerro and the 8 freeway access already and adding more cars to this situation will not make this a good idea. In addition the architectural renderings submitted for the project does not fit this neighborhood in style or size.

I140-2 | This community does not need another Church with traffic coming in and out of the area frequently, but instead needs more outdoor places for the existing community to mingle and meet. I propose a city dog park for this area since the topography wouldn't need to be leveled, people could walk their dogs there so limited traffic congestion and we could keep the general nature of this open space intact.

I140-3 | Please do not approve this nonsensical plan and tell the All Peoples Church find a non-contested area to build their desired Church.

Thank you for your consideration.

Sabine Steck
The KenGina Team
DRE#: 01361360
8889 Rio San Diego Drive, Suite 200
San Diego CA 92108
m: 619.248.7853

I140-1

Refer to Master Responses 4, 5 and 6 related to general opposition, transportation and neighborhood character.

I140-2

Comments on alternative uses for the site, including open space, are addressed in Master Response 1 on that issue.

I140-3

Refer to Master Response 6 related to general opposition.

Comments

Responses

3.1.3.141 Letter I141: Nathan Stein

Letter I141

October 16, 2022

City of San Diego Development Services Center
ATTN: Courtney Holowach
1222 First Avenue
MS 501
San Diego, CA 92101

RE: Comments on Draft Environmental Impact Report
Project Name: All Peoples Church
Project No.: 636444

To whom it may concern,

I141-1 As I am a resident of Del Cerro, first moving into the area in 1991, I hereby submit the following comments in response to the City of San Diego's ("City") Draft Environmental Impact Report ("Draft EIR") dated August 31, 2022, for the "All Peoples Church" project ("Project") (Project Number 636444).

In general, I believe that the Draft EIR report for project 636444 is deficient with respect to several issues as it relies upon conflicting information, incomplete data, and erroneous assumptions. These factors have caused the City to underestimate the significant impact on the community.

I believe that the documentation and information relied upon by the City in preparing the Draft EIR is inadequate and does not support the conclusions that the project would not have a significant impact on: Energy Usage (Section 7.1.3), Public Services and Facilities (Section 7.1.11); and Transportation (Section 7.1.12). In addition, the Draft EIR relies upon outdated, incomplete, and inadequate information to underestimate potential significant impacts the Project will have on the community with regard to: Land Use (Section 5.1), and Visual Effects and Neighborhood Character (Section 5.5). In doing so, the Draft EIR also incorrectly concludes that the Project's impacts are not cumulatively considerable.

At a minimum, the reports upon which the Draft EIR is based demonstrate a need for further analysis to ensure reliable data is used for the City to make an informed analysis regarding the potential environmental impact of the Project. In general, the Project's major potential impacts appear to be glossed over based on incomplete and flawed data. The Draft EIR fails to adequately address the significant issues facing the residents of Del Cerro and the true cumulative and Project-level impacts on all of us.

I141-2 Specifically, the City should collect additional information regarding the potential impacts associated with implementation of the Project before finalizing the environmental impact report for consideration by decision-making authorities:

Section 5 – Environmental Analysis

- 5.1 – Land Use - The Draft EIR approaches the subject from the pretense that simply adding a cross to the map eliminates a multitude of issues/impacts to the surrounding community. [P. 5.1-10]
- Table 5.1-2 (page 5.1-38) the response in the consistency evaluation section is inaccurate. The principal objective notes "encourage the development of a variety of new housing types with dwelling unit densities primarily in the low to medium density range as shown." The response states

I141-1

This comment references various sections of the DEIR; however, without any specificity or evidence with regard to the supporting documentation, a specific response cannot be provided to this comment. The supporting documentation does not recommend further analysis beyond that which is contained in the DEIR. The data is reliable, the analyses are complete, and prepared consistent with the CEQA Statute and Guidelines. The information presented in the DEIR, therefore, is adequate for the decision-makers to make an informed decision on the project. Refer to Responses to Comments I141-2 through I141-7 for additional responses. Master Response 5 provides detail regarding how the VMT analysis is used to address both direct and cumulative impacts, consistent with the Office of Planning and Research guidance for assessing transportation impacts under CEQA.

I141-2

Refer to the response to comment letter O3-04 on the same issues. Refer to Master Response 3 on the project's land use policy consistency with the applicable policies from the General Plan, Community Plan, zoning and SDMC regulations, which addresses the specific policy concerns expressed in this comment. Furthermore, the SDMC Section 126.0602(a)(2) allows projects to propose a Planned Development Permit (PDP) to allow a use that is permitted by the land use plan but not allowed by the underlying zone.

Comments

Responses

I141-2 (cont.)	– yes. This is counterintuitive, once the church is built no housing will be built onsite or in the area because of the church the answer here should be no.
I141-3	<ul style="list-style-type: none"> The Draft EIR fails to provide support for its conclusion that although the Project “would substantially alter the existing and planned residential character of the area, the project’s height, bulk, signage, or architectural projections would not result in a negative visual appearance due to its topographically-sensitive site layout, cohesive architectural styling, and below grade placement of retaining walls combined with the heavy use of screening vegetation and landscape treatments to soften its appearance from nearby public and private viewing areas.” (Section 5.5.4.2) • In particular, the report does not include any detailed information showing the landscaping plan to illustrate “the heavy use of screening vegetation and landscape treatments to soften its appearance from nearby public and private viewing areas.” The Draft EIR 5.5.4.3 – notes a less than significant neighborhood character impact. The document makes multiple references to matching designs from SDSU and other buildings along the 8 that are not part of the local community and do not share similar architectural features. Also the addition of a large religious symbol at the entrance to the community would be a drastic divergence from the current community character in that area. If the Project truly wanted to match designs of the community, they should have looked at the Temple across the street from their site. The Temple took great pains to match the neighborhood and did not place large symbols/signage that exceeded the zoning limits. The less than significant character impact declaration is not accurate.
I141-4	<p>Section 6 – Cumulative Impacts</p> <ul style="list-style-type: none"> The study does not include city project number 671402 – which the city has been fielding questions on since August 27 of 2020. This project is currently under review with DSD - permit number PRJ-1061051. The data in the study does not include potential impacts from this project which is an estimated - 1316 trips including 97 (53 in : 64 out) during the AM peak hour and 121 trips including 78 in: 43 out) during the PM peak hour. – The Applicant stated at the Navajo Community Planners October 12, 2022, meeting that this was due to the EIR study was done prior to this report. Since this information is known, the City should require a new analysis be done. Since we know of the conflict, we should address it.
I141-5	<p>Section 7 – Other CEQA Sections [No Potential Significant Impacts Found] 7.1.3 - Energy Usage</p> <ul style="list-style-type: none"> The Draft EIR has a subsection titled Operations (7.1.3.1) – in this section they note 280 daily trips during weekday – which is just shy of the “SIGNIFICANTLY IMPACTFUL.” 300 DAILY TRIPS. This number was calculated but based on the flawed traffic study needs to be revised and would show a significant impact if done using accurate data points. <ul style="list-style-type: none"> Item 8.4.1 in appendix J notes that the gym usage was calculated at 0-10 users per day, but the attached document sent to the mayor on 12-21-20 by the Atlantis Group notes the gym will be used for youth/community sports. Furthermore, at the Navajo Community Planners October 12, 2022, meeting, the applicant stated that the gym would be used by community members, but they did not calculate the number of people/cars that would be used to bring the community members to the gym. The usage of the gym alone will push the weekday usage far beyond the 280 trips per day. Item 8.4.2 in appendix J discusses Sunday trip generation and appears to use the data from Appendix K, page 6 which is showing data points from 2018 and 2019. The applicant stated at the Navajo Community Planners October 12, 2022, that they took future anticipated attendance into consideration when generating the trip generation; unfortunately, this is incorrect as the church has already outgrown the growth projections used to calculate the number of trips that will be generated. This analysis should be redone using the correct assumptions.
I141-6	

I141-3

Refer to response to comments O3-5 and O3-7. Refer to Master Response 4 regarding neighborhood character. Based on the analysis contained in DEIR Section 5.5, *Visual Effects and Neighborhood Character*, the project would result in less-than-significant impacts.

I141-4

Refer to response to comment letter O3-4 on the cumulative impacts issue and the Master Response 2 on cumulative impacts contained in this DEIR Chapter 6. The cumulative analysis in the DEIR is valid and a revised analysis is not warranted.

I141-5

Refer to response to comment letter O3-10 on the transportation issues, as well as the transportation Master Response 5 on trip generation rate contained in this FEIR.

I141-6

Refer to response to comments O3-10 and O3-12 on the transportation issues, as well as the transportation Master Response 5 on trip generation rate.

Comments

Responses

I141-6
(cont.)

• 7.1.12 - Transportation

- For example, the applicant estimated that use of the gymnasium (which takes up a considerable space) would be used by only 0-10 people on weekdays. This grossly underestimates the number of people that would appear for even a youth basketball game for instance.
- This estimate is also directly contradicted by the applicant's own admission that the gym will be used for youth/community sports (See Atlantis Group letter to Mayor dated 12-21-20.)
- In addition, the applicant currently has a staff of 25-30 persons, it is unreasonable to estimate that they will not have additional staff when this massive facility is built. The maintenance alone will require additional staff.

I141-7

Housing Crisis – Our Mayor and the SD City Council have made housing the top priority and have all acknowledged that San Diego is in a severe housing crisis. This property has already been approved by the City Council for a 24-unit housing project. In addition, the City Council already denied an additional traffic light in that same area when approving the housing plan, which it is zoned for. This change does not make sense..

Sincerely,

Nathan Stein
5534 Del Cerro Blvd.
San Diego, CA 92120
natesteins@gmail.com

I141-7

The housing crisis is not an environmental impact. Refer to Master Response 3 regarding residential housing policy consistency.

Comments

Responses

3.1.3.142 Letter I142: Lisa Stein

Letter I142

October 17, 2022

City of San Diego Development Services Center
ATTN: Courtney Holowach cholowach@sandiego.gov
1222 First Avenue
MS 501
San Diego, CA 92101

CC: Martha Blake mblake@sandiego.gov
Development Services Dept dsdeas@sandiego.gov
JoelaCava@sandiego.gov
JenniferCampbell@sandiego.gov
StephenWhitburn@sandiego.gov
MMontgomerySteppe@sandiego.gov
MarnivonWilpert@sandiego.gov
RaulCampillo@sandiego.gov
VivianMoreno@sandiego.gov
SeanEloRivera@sandiego.gov
info@kentleeforsd.com

RE: Comment/Response for Draft Environmental Impact Report
Project Name: All People's Church
Project Number: 636444

To All Concerned:

I142-1 I am a 31-year resident of Del Cerro. I have reviewed the City of San Diego's Draft Environmental Impact Report ("Report") dated August 31, 2022, for All People's Church project ("Project") 636444 and am presenting my comments on what I believe are multiple inadequacy with the Draft Environmental Impact Report and this proposed project.

The City of San Diego has created an infrastructure in conjunction with its communities that acknowledge the uniqueness of each neighborhood. The proposed Project is not consistent with the Navajo Community Plan or the design and uniqueness of the Del Cerro neighborhood.

As noted in Section 5.1.2.2 City of San Diego General Plan,

The General Plan is a comprehensive, long-term document that sets out a long-range vision and policy framework for how the City could grow and develop, provide public services, and maintain the qualities that define San Diego.

Land Use and Community Plan Element, The Land Use Element addresses land use issues that apply to the City as a whole and identifies the community planning program as the mechanism to designate land uses, identify site-specific recommendations, and refine citywide policies, as needed. The Land Use Element establishes a structure that respects

I142-1

With regard to land use and community character, the DEIR Section 5.1 discloses that a non-residential use would be constructed on site instead of housing. The land use policy analysis in DEIR Section 5.1 demonstrates that the church would comply with the applicable Residential Element and Community Environmental Element policies in the Navajo Community Plan related to design and community character. As described in the DEIR Section 5.5 and Master Response 4 regarding neighborhood character, the project has been sensitively sited on the property. The DEIR Section 5.5 discloses that the project's massing and architectural style would be distinctive from that of the surrounding one-story, ranch-style homes in the vicinity, but further notes that the project has been carefully designed to respect the residential character to which it is adjacent.

Comments

Responses

<p>I142-1 (cont.)</p>	<p>the diversity of each community and includes policies that govern the preparation of community plans.</p> <p>Community plans are important because they contain detailed land use designations and site-specific policy recommendations than is possible at the citywide level including specific policies intended to respect essential community character. Future public and private projects are evaluated for consistency with land uses, goals and policies in the community plans.</p> <p>As noted in Section 5.1.2.4 Navajo Community Plan The project site is governed by the Navajo Community Plan (Community Plan), which was adopted by the San Diego City Council in 1982. The Community Plan is intended to supplement General Plan policies by identifying specific community issues and policies that build on those already embodied in the General Plan</p> <p>The Navajo Community Plan identifies a “vision” for the future development of the Navajo community and contains policies that implement that vision. The uniqueness of the Del Cerro and greater Navajo community should not be ignored. The proposed project is clearly using the very different uniqueness of the College Community Plan that includes SDSU to model its architecture.</p>
<p>I142-2</p>	<p>The plan specifically identifies the area to be RS-1-7 zoning, in line with this bedroom community of midcentury, California ranch style homes. The City Council agreed in 2017 and approved Project No. 435438, the building of 24 single family homes on this property, further strengthening vision of the community and in line with the City’s mandate for more affordable housing.</p> <p>The mere suggestion of adjusting this zoning by simply “adding a cross symbol” for the purpose of building a church fly in the face of the General Plan, Navajo Community Plan, the character of the neighborhood, the City Council and is a violation of the San Diego Municipal Code <u>Table 131-04B</u>, Use Regulations Table for Residential Zones, that specifically disallows religious assembly in RS 1-7 Zoning.</p>
<p>I142-3</p>	<p>In addition, Section 6 Cumulative Impacts is silent to the city project 671402, PRJ-1061051, which the City of San Diego Development Services Center has been fielding questions on since August 2020. Since this is a known project that impacts the same area, the city should require a new analysis to include the cumulative impact of this potential project, including impact to traffic and additional environmental impacts.</p> <p>Thank you for consideration of this response and public comment, I look forward to a response</p> <p>Sincerely, Lisa Stein 5534 Del Cerro Blvd San Diego, CA 92120 Sdsteins1@gmail.com</p>

I142-2

The project would not rezone the property because the City does not have a zone classification for church or religious institutions. Residential zoning would remain intact. The San Diego Municipal Code (SDMC) Section 126.0602(a)(2) allows projects to propose a Planned Development Permit (PDP) to allow a use that is permitted by the land use plan but not allowed by the underlying zone. That process is what is proposed to permit the church on a residentially zoned site. Refer to Master Responses 3 and 6 regarding land use policy consistency and general opposition to the project.

I142-3

With regard to the application on the adjacent parcel received after the project’s NOP was circulated, refer to the response to comment I20-3 and Master Response 5 provides detail regarding how the VMT analysis is used to address both direct and cumulative impacts, consistent with the Office of Planning and Research guidance for assessing transportation impacts under CEQA. The cumulative impact analysis provided in DEIR Chapter 6 and related transportation analysis takes into account future growth in the project area, as described in the Master Response.

Comments

Responses

3.1.3.143 Letter I143: Dana Stewart

Letter I143

From: Dana Stewart <nanistewart@icloud.com>
Sent: Tuesday, October 11, 2022 10:14 AM
To: DSD EAS <DSDDEAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church

All Peoples Church
Project No. 636444
SCH No. 2021100394
Community Plan Area: Navajo
Council District: 7

To whom it may concern,

I143-1 | Zoning laws were put in place to protect neighborhoods from projects such as this. I've lived in Del Cerro for over 30 years, and Del Cerro has always been a nice, safe, family neighborhood. Please don't let that be destroyed.

Regards,
Dana Stewart

I143-1

This comment does not address the adequacy or content of the DEIR. Refer to Master Response 6 regarding general opposition to the project.

Comments

Responses

3.1.3.144 Letter I144: Kurt and Susan Stormberg

Letter I144

From: kurt stormberg <kurtstormberg@hotmail.com>
Sent: Sunday, October 9, 2022 10:41 AM
To: DSD EAS <DSD EAS@sanidiego.gov>
Subject: [EXTERNAL] Environmental Impact Report

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I144-1 Ms. Holowach,
I am writing in opposition to the construction of All Peoples Church in Del Cerro. The area proposed was zoned for residential housing and could have accommodated this amount of traffic. Unfortunately, someone has allowed this permit to go through without a zoning change. The volume of traffic would overwhelm the area around the proposed church to the detriment of the residents of Del Cerro. In addition, the City has chose to allow an entity with tax-exempt status to occupy a city parcel that could have generated tax proceeds in the form of property taxes for the foreseeable future. We are opposed to this project.

Sincerely,
Kurt and Susan Stormberg
5888 Overlake Ave
San Diego, CA 92120

I144-1

This comment does not address the adequacy or content of the DEIR. Refer to Master Responses 5 and 6 regarding College Avenue operational changes and general opposition to the project.

Comments

Responses

3.1.3.145 Letter I145: Judy Swinko

Letter I145

10/13/2022

RE: All Peoples Church

Project # 636444

SCH #2021100394

I145-1 | As a 42-year resident of Del Cerro I have many reasons to **not support** the proposed All Peoples Church project. This project will impact the surrounding open space along Highway 8 and College Avenue. Flora and fauna on this land will be diminished. The homes that surround this land will lose the buffer this environment creates.

I145-2 | We live about one mile northeast of the site. The three drivers in my family go through the intersection of College and Del Cerro multiple times a day. This is very busy intersection. The northbound and southbound lanes are not level to each other. Currently, these two levels are not problematic. However, since the property in question is lower than the southbound lanes, we envision serious complications that will impact current drivers along College Blvd.

Let me explain. The entrance site in question for those driving north on College Ave would be appropriate. But their exit, north would be opposite direction we would assume they would want to turn. Please don't even consider a U-turn at the Del Cerro/College intersection as crashes would occur regularly. Those church members who drive south on College Ave to get to the site is another matter. They will drive past the site. Then they will go through 5 lighted intersections and make a U-turn at the Jack-in-the Box at the top of the hill at SDSU and hit all those lighted intersections again. Well, at least they would be going in the correct direction when they leave church.

Given the current sorry leadership in this fine city, I expect the creation of a complicated intersection which will cost taxpayers millions of dollars to serve one congregation. Given that the church is exempt from Income tax why would my neighbors and I want to be not only inconvenienced, but also foot the bill so they can have a driveway convenient only for them? It will serve no other group.

The Del Cerro/College Ave intersection already serves thousands of residents, a synagogue, two elementary schools, and San Diego State University. At certain times a day I wait through more than one light to make my southbound turn. I expect these long waits to happen at certain time a day and think nothing of it.

But this "new" plan will undoubtedly have a negative effect on my multiple daily drives to and from our neighborhood as well as my attitude and frustration if this project is given the green light. This will not be an *only* a Sunday situation. Churches serve their congregations multiple times a week so do not pass this off as *just* on Sunday inconvenience.

I145-1

This comment does not address the adequacy or content of the DEIR. Refer to response to comment I120-1 for a response on the same topics.

I145-2

This comment contains speculation as to how church users would travel to and from the site and does not address the adequacy of the DEIR. A signalized intersection would be provided at the main driveway to the site, which does not necessitate a U-turn movement. Refer to the response to comment I104-1 with regard to the speculation that project traffic would complete a U-turn at the College Avenue/Del Cerro intersection against the signed control. CEQA Guidelines Section 15145 prohibits speculation in an environmental analysis. Refer to Master Response 5 regarding the College Avenue operations, as documented in the Local Mobility Analysis (DEIR Appendix J).

Comments

Responses

I145-3 I want your office to be aware of information shared with our community just days ago. There will be a 6-story, high density apartment complex built on Del Cerro Blvd. It's being built under the Complete Communities program. This will be built on a Band-Aid sized lot, feet from the Del Cerro/College Ave. intersection. There was no city required vote on this project nor any neighborhood input. These 114 units will bring more drivers and parked cars to our street because it is hard to imagine parking included on this tiny lot.

I145-4 I've lived in San Diego since 1967. My husband and I have owned several properties in San Diego. We pay our property tax in a timely manner and care for our property. We don't fudge on our income tax. We vote in every election. We are a family of teachers all of whom have taught at multiple SDUSD elementary schools in low income neighborhoods. My husband is over eighty and still substitutes. We have never asked for a free ride or favors. We just want to age in place in Del Cerro with the least amount of stress and complication possible.

Thank you for your consideration. I hope and pray rational thinking prevails and The Peoples Church looks for a far better lot for their church and I can once again have confidence in my city leaders.

Sincerely, Judy Swinko and family

I145-3

These comments pertain to another project application undergoing review at the City and do not address the DEIR adequacy. Refer to Master Response 5 regarding how the VMT analysis is used to address both direct and cumulative impacts, consistent with the Office of Planning and Research guidance for assessing transportation impacts under CEQA.

I145-4

General opposition to the project is noted and is addressed in Master Response 6 on that topic.

Comments

Responses

3.1.3.146 Letter I146: Jim Treglio

Letter I146

From: Jim Treglio <jtreglio@tregliolaw.com>
Sent: Sunday, October 16, 2022 12:11 PM
To: DSD EAS <DSDEAS@sandiego.gov>
Subject: [EXTERNAL] Re: All Peoples Church, Project No. 636444

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To Whom It May Concern:

I146-1 I am writing to question the adequacy of the Environmental Impact Report as currently drafted. While I am certain the EIR was drafted with the best intentions, the City Staff failed to recognize the impact of future development in the area. Specifically, the area in question is a Priority Development Area, as defined by California law, as it is within blocks of public transit. Specifically, there is a bus stop which leads directly to the transit center at SDSU. As such, future development in this neighborhood will include multi-family housing, and under the new law just signed by Governor Newsom, these new developments will not have to accommodate new parking. <https://www.capradio.org/articles/2022/10/12/california-law-abolishes-parking-minimums-for-new-developments-close-to-public-transit/#:~:text=Governor%20Gavin%20Newsom%20has%20signed,of%20a%20public%20transit%20stop.> As a result, this neighborhood will see greater traffic and parking needs in the coming years. Indeed, there is already a planned development at the corner of Madra and Del Cerro Boulevard (just a block away) which will likely not require any parking whatsoever.

In other words, the parking at the project is inadequate and the neighborhood cannot accommodate the increase in car traffic. Further, when events at the Church conflict with Temple Emanu-El (which is going to be right across College Avenue), this will lead to further congestion. Already on High Holy days, my street, Vinley Place, is congested with traffic. Equally, the traffic during school hours from Hearst is already extensive. Despite the claims that the services will take place on Sundays, there is no guarantee that this will be the case on a going-forward basis. And given the antipathy this particular congregation has against Judaism (they have been quoted as trying to “convert” the members of the Temple), it is likely that services will take place on Jewish holidays, leading to further traffic, parking issues, and congestion. And as a parent of young children, I am concerned that this increase in traffic will cause harm to my children, as fumes from vehicles have been linked to asthma in children.

In short, I request that the City Staff rework the EIR to consider the recent developments in the law, and in the likely use of these facilities for every day of the week, rather than just Sundays.

Sincerely,

Jim Treglio, resident of 5739 Vinley Place, San Diego, CA 92120.

I146-1

Project transportation effects are analyzed in the DEIR consistent with the City's Transportation Study Manual and staff direction. The Vehicle Miles Traveled (VMT) Assessment screening analysis determined that the project is presumed to not result in a significant transportation impact. Also refer to Master Response 5 regarding the College Avenue operations. Furthermore, the CEQA Guidelines do not require a parking analysis. DEIR Chapter 3 discloses the number of parking spaces provided by the project and that the number exceeds the City's parking requirements per the Land Development Code.

Refer to Master Response 5 regarding how the VMT analysis is used to address both direct and cumulative impacts, consistent with the Office of Planning and Research guidance for assessing transportation impacts under CEQA. The comment contains speculative conjecture on what activities may occur on site that are not based on information presented by the applicant. CEQA Guidelines Section 15145 prohibits speculation in an environmental analysis. No additional response is required.

Comments

Responses

3.1.3.147 Letter I147: Christine van Spronsen

Letter I147

From: Christine vS <staffcah@gmail.com>
Sent: Sunday, October 16, 2022 4:33 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church, Project No. 636444

To whom it should concern,

Please accept this letter as my input on this project.

Project Name: All Peoples Church
Project No. 636444

I147-1 I have looked over the 1536 pages of draft EIR made available to the public. From what I can understand, there are numerous zoning violations, code violations, environmental harms, traffic, drainage, air quality, and noise concerns that appear to be able to be mitigated, modified or ignored to make the plan OK. The report has covered my environmental concerns, but by tweaking the zoning and code restrictions, the project should not be approved. This mega project is very wrong for Del Cerro. It will disrupt the neighborhood feel of this area which has been enjoyed for over 65 years.

I147-2 I have lived on Marne for 27 years and enjoy the quiet Sunday mornings. The noise and lighting will be amplified to Marne and some of the other streets immediately east of the project.

The proposal does not include weekday child care or classes. It would be naive to think the church would build such a mega structure and not have these services in mind for the future. If the church decides to add these services then some of the reports would not be accurate, ie traffic, noise, air quality, etc.

There are many empty buildings that could be converted for the All People's Church, which could accomplish the same desires they seek from using this parcel. They think they are going to attract new members just because their sign can be seen from the freeway. I think they are being unrealistically optimistic. The Flood Church in Grantville has done a wonderful job with a conversion of a vacant building. I know All Peoples Church could do the same. Leave this land vacant to give us a little nature in our neighborhood.

I hope you can vote with your hearts and for the people you represent.

Please do not approve this project.

Sincerely,
Christine van Spronsen

I147-1

General opposition to the project is addressed in Master Response 6 on that issue. Also refer to Master Response 3 regarding land use policy consistency and DEIR Sections 5.4 (Noise), 7.1.2 (Air Quality), and 7.1.12 (Transportation) for analysis of project impacts on those topics. Less than significant impacts would occur to air quality and transportation and, with mitigation incorporated, noise.

I147-2

DEIR Section 5.4 concludes that there would not be operational noise impacts on the nearest residences along Marne Avenue (refer to DEIR Appendix E). Additionally, both project lighting and construction and operational noise are required to comply with the noise limits specified regulations in the San Diego Municipal Code (SDMC). A daycare and school are not a part of the project application on file with the City. Future programmatic changes would require an amendment to the permit and would be subject to additional CEQA review. Refer to the Master Responses 1 and 6 related to general opposition and alternative location and use.

Comments

Responses

3.1.3.148 Letter I148: Jon Wiggins

Letter I148

From: Jon Wiggins <jonwiggins@me.com>
Sent: Monday, October 17, 2022 7:43 AM
To: Holowach, Courtney <CHolowach@sandiego.gov>; DSD EAS <DSDEAS@sandiego.gov>; Blake, Martha <MBlake@sandiego.gov>
Cc: Hadley, Steven <SRHadley@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>
Subject: [EXTERNAL] Del Cerro

Good morning,

I148-1 I live in La Jolla, but frequent this area quite a bit to help with a mutual aid business about a mile from this project. We have a local church that has grown from 50-75 attending members to over 1,000 in the last 7 years. This has put a tremendous strain on our neighborhood given that the vast majority commute from all over San Diego. In our case, this is an allowed use with limitations that we are currently exploring. In Del Cerro's case, this is not an allowed use and City code spells that out very clearly. I'm struggling to find the disconnect here. If any of you have been in Point Loma and experienced The Rock church traffic on a Sunday then you owe it to yourself to take a drive over and check it out. The has to be experienced to be believed. This project will create the same type of impact given its scale.

I148-2 On a practical and financial front, this church will not contribute anything to the City's coffers as they are exempt from most taxation. The 24 unit housing project that is approved for this property would easily generate \$250,000+ dollars in property tax and provide the most elusive benefit San Diego needs right now. Housing.

Jon Wiggins

I148-1

Refer to Master Responses 3 and 6 regarding general opposition and land use policy consistency.

I148-2

This comment does not address the adequacy of the DEIR. Development of housing on the project site is not a project objective identified in DEIR Chapter 3 Chapter 3; refer to the Master Response 3 on the City's residential housing policy.

Comments

Responses

3.1.3.149 Letter I149: Brain Woolsey

Letter I149

From: Brian Woolsey <woolseywrites@gmail.com>
Sent: Sunday, October 16, 2022 10:48 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church Project No. 636444

To Whom it May Concern:

Here's my three-word take on the project proposed by All Peoples Church:

I am opposed.

I149-1 There is, as you know, a housing crisis in San Diego. And that same property has already been approved for 24 houses. That's 24 more families who can move into the neighborhood, frequent local shopping, pay taxes, and attend any of the many houses of religion that already serve the area.

Then there's the environmental impact. With 95 percent of people visiting the church property coming from out of the area (as estimated by the church, I am told), well, that's a lot of vehicle miles travelled. And I just learned that those miles, too, go against one of the City's previously stated plans, which is to reduce greenhouse emissions as stated in the Climate Action Plan.

The proposed project is also a violation of the San Diego Municipal Code. That's because the property is zoned as residential. An amendment to the General Plan can change that. Or we can ease the housing crisis and grow the City's tax base. The Navajo Community Plan also does not include adding a new church. That, too, can be revised. Or we can welcome 24 more families into the neighborhood – who will not add anywhere near the same level of greenhouse emissions.

Please join me in opposition to the All Peoples Church project.

Thank you for your consideration.

Sincerely,

Brian Woolsey
6545 Del Cerro Blvd.
San Diego, CA 92120

I149-1

This comment poses a series of general questions that are not specifically linked to the adequacy of the DEIR. Refer to Master Response 2 on cumulative impacts. Refer to DEIR Section 8.1 for a discussion of the reasonable range of alternatives considered for the project.

In addition, development of housing on the project site is not an objective of the project; refer to Master Response 3 on the City's residential housing policy. The project did not qualify for a detailed Vehicles Miles Traveled (VMT) analysis because it meets the definition of a Small Project in the Transportation Study Manual, and thus is presumed to have a less than significant traffic impact. General opposition to the project is noted and is addressed in Master Response 6 on that issue.

Comments

Responses

3.1.3.150 Letter I150: Evan Youngstrom, Lewis and Sarah Dawson, Judith Abegglen, Susan and Hailey Andrews, Lisa Busalacchi, Goncalo and Nancy Gloria

Letter I150

From: Evan.Youngstrom@lw.com <Evan.Youngstrom@lw.com>
Sent: Sunday, October 16, 2022 6:52 PM
To: DSD EAS <DSEAS@sandiego.gov>
Cc: lew.dawson@gmail.com <lew.dawson@gmail.com>
Subject: [EXTERNAL] Response To Draft Environmental Impact Report For All Peoples Church No. 636444

To Whom It May Concern:

I150-1 After evaluating the draft environmental impact report (hereinafter EIR), we have determined there to be shortcomings that should be thoroughly and completely addressed before continued consideration of this project. We will highlight a number of fair and reasonable arguments related to the inadequacy of both the report and the project itself.

Traffic

This report does not address the traffic impact of the completed project in a number of areas. No defensible study or studies have been produced to provide quantitative metrics to the follow areas:

1. Peak-Hour Traffic Impact
2. Inconsistent & Outdated Data Sampling
3. Future Projected Traffic Impact
4. Cumulative Traffic Impact
5. Unsubstantiated Statements
6. Net-Negative Traffic Impact With No Mitigation
7. Alternative Circulation Patterns

Per Appendix J, Local Mobility Analysis, single samples were collected for three determined peak-traffic periods (section 8.3.2):

Existing counts were collected between 7:00 AM and 9:00 AM for the AM commuter period and from 4:00 PM to 6:00 PM for the PM commuter period on Tuesday, April 16, 2019, and from 10:45-11:45 AM on Sunday, April 28, 2019 to capture the time period between the two historically highest attended services.

Subsequent sections will refer to this.

Peak-Hour Traffic Impact

A single sample of each peak-hour period is statistically insignificant and statistically dangerous to use for inference. One cannot deduce statistical norms and deviational errors of a population with a single sample for a given period. In addition, the collection mechanism used to gather raw traffic data has not been defined, leading to uncertainty and doubt about the accuracy and validity of the data.

Outdated & Inconsistent Data Sampling

In addition to stated statistical sampling issues, projected traffic data is outdated by a magnitude of years. Traffic projections stated in Appendix J are based upon 2019 traffic analysis data, over three years old, while church attendee numbers are from over four years ago (section 8.4.2):

Using current attendance and vehicle occupancy, o peak hour and daily vehicle forecast was determined for the maximum seating capacity of 900 seats as shown in Table 12.



I150

Refer to responses to comments I27-7 through I27-17 regarding the same issues in this comment.

Comments

Responses

<p>1150-1 (cont.)</p>	<p>No current (i.e., 2022) traffic figures nor church attendee figures are used to validate these numbers, nor is a reasonable argument provided to assert that the 2022 and beyond numbers do not deviate significantly from the numbers used in this EIR.</p> <p>Future Projected Traffic Impact In addition to being based upon outdated data sampling, as mentioned above, the future projected traffic impact data is also improperly based upon a single-point-in-time analysis. It fails to account for traffic growth from other sources in the community (e.g., the proposed six-story apartment complex along Del Cerro Boulevard), as well as failing to account for potential growth in the number of services held by the church, expansion of the church's activities to days other than Sundays, or potential future expansion/restructuring of the church building itself to accommodate more congregants at each service. The data also fails completely to consider the increased vehicular and pedestrian traffic incidents and fatalities that necessarily accompany increased traffic.</p> <p>Cumulative Traffic Impact No reports on the cumulative traffic impact of this project, particularly in conjunction with other proposed developmental projects in the vicinity (i.e., the proposed six-story apartment complex along Del Cerro Boulevard) and community/SDSU events (e.g., concerts, graduation, sporting events, etc.), have been provided. Evaluation of traffic impact must take into account not only street-level impacts but also region-level impacts.</p> <p>Unsubstantiated Traffic Statements Section 7.1.2.1 of the EIR states:</p> <p><i>Under the existing land use designations in the Navajo Community Plan and RS-1-7 zone, the project site can build up to 52 single-family residences, assuming a 5,000-square-foot (SF) lot minimum over the approximately 6-acre site. The project would produce less traffic on an average weekly basis than a residential use that would be consistent with the existing zoning for the project site.</i></p> <p>However, no analysis or figures are provided to back up the assertion that the church project would produce less traffic than would single-family residences. It also fails to account for the difference in traffic patterns produced by single-family homes versus a church (i.e., a church will produce large amounts of traffic at a single time while the traffic produced by single-family homes will be sparse).</p> <p>In addition, no quantitative analysis is provided to give defensible merit to their subsequent claim of air-quality impact (Section 7.1.2.1):</p> <p><i>Less than significant impacts would result</i> Net-Negative Traffic Impact With No Mitigation Using rudimentary logic, it can be deduced that adding an additional traffic signal to a currently uninterrupted road segment will have net-negative impact. Thus, the addition of a traffic light between two established intersections, the Del Cerro Blvd and College Avenue intersection and the 8 West exit intersection, will force a subset of vehicles to stop for a duration of time. It can be concluded, based upon this same rudimentary logic, that this will cause additional friction for this subset of vehicles desiring to enter the 8 West freeway onramp.</p> <p>Further, as can be seen along College Avenue near the 8 East freeway offramps and onramps, when there are too many traffic signals within a short stretch of road, it results in stunted traffic flows, especially when the signals get out of sync. Adding another signal to the north side of College Avenue would result in equivalent stunted traffic flows, compounding the issue.</p> <p>Alternative Circulation Patterns</p>
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Comments

Responses

1150-1
(cont.)

The EIR and Appendix J provides an incomplete proposal and analysis of potential traffic circulation patterns. For example, no analysis was provided (nor proposed) with regard to a roundabout or traffic circle. Alternative exploration is requested to understand if there are less impactful solutions available.

Land Use

Zoning

This approximately six-acre site is zoned under residential RS-1-7. Per city [zoning regulations](#) in Table 131-04B, Use Regulations Table for Residential Zones, use category *Assembly and Entertainment Uses, including Places of Religious Assembly* is designated as "Use or use category is not permitted." The project requires a Planned Development Permit (PDP) entitlement to address the deviation from the current zoning ordinances. Zoning ordinances, specifically residential, are important because they:

1. Control the character of a neighborhood, and
2. Control noise and traffic flow of a neighborhood.

While the project has attempted to address these concerns, they fall in several short key areas:

1. Having a multistory, brightly painted structure—regardless of the argument surrounding subtle architectural features and accents—does not blend in with the overwhelming majority of single-family dwellings in the neighborhood.
2. Having a 900-person church in the neighborhood will produce a substantial increase in both noise and traffic at multiple periods of certain days—this would not be the case with the proposed alternatives.
3. The EIR fails to account for continued future growth in the church's offerings. Appendix J fails to project for compounding future growth over multiple time periods. A primary goal of any church, including this church, is future growth, particularly in terms of event count and event attendee count. When activities begin taking place at the church during peak traffic times, when taking into account continued future growth, the traffic impact will be untenable for residents.

Proposed Alternatives

The Del Cerro community is in favor of this parcel of land being used to benefit the community of Del Cerro and the city of San Diego. Below are ideas from the community for more appropriate ways to use the space, including:

1. Low-Density Housing
2. No Project, City-Owned Land
3. Community Park
4. Tiny Home Village for the Homeless

Low-Density Housing

When the land was purchased by the developer who sold it to the church, the plan was to use the land to build single-family residences. This type of development of the property would be entirely appropriate, as the parcel is specifically zoned already for single-family homes and the need for housing in San Diego continues to increase.

No Project, City-Owned Land

The community has appreciated for years the natural beauty of the land, as has everyone who drives past the College Avenue intersection with the 8 freeway. Many in the community favor leaving the land with its natural landscape, to help the environment.

Comments

Responses

150-1
(cont.)



Community Park

A park with paths for walking and bike/scooter riding, a playground area, and potentially a recreation center would benefit the community tremendously, particularly with the increase in families expected in the immediate area with the development of the proposed apartment building along Del Cerro Boulevard.

Tiny Home Village for the Homeless

This parcel of land could also serve as San Diego's first test of a program that has been highly successful in combating homelessness in other cities in the nation: a tiny home village for the homeless (such as the one recently approved in Chula Vista).

Thank you for your consideration.

Evan Youngstrom (6209 Del Cerro Blvd.)
Lewis & Sarah Dawson (6251 Capri Dr.)
Judith Abegglen (6225 Del Cerro Blvd.)
Susan & Hailey Andrews (6228 Capri Dr.)
Lisa Busalacchi (6235 Capri Dr.)
Gonzalo and Nancy Gloria (6240 Capri Dr.)

Best,

Evan R. Youngstrom

LATHAM & WATKINS LLP
Cell: +1.858.209.4449
Email: evan.youngstrom@lw.com
<https://www.lw.com>

Comments

Responses

3.1.4 Late Letters

3.1.4.1 Letter L1: Paula Berberick

Letter L1

From: Paula Berberick <paulaaberberick@gmail.com>
Sent: Thursday, October 20, 2022 10:56 AM
To: Holowach, Courtney <CHolowach@sanidiego.gov>
Subject: [EXTERNAL] Opposition to All Peoples Church Project

Dear Councilmember Holowach,

L1-1 | As a lifelong resident of the Del Cerro area, I am writing to express my significant concerns with the All Peoples Church project currently being planned for our community.

My husband and I strongly oppose this project for the following reasons:

- San Diego is in the midst of a **severe housing crisis**. This project is planned on a site that has already been approved for a 24-unit housing project, and that is the project that should be built on this site. By approving the church project, councilmembers will be voting NO on improving our housing crisis.
- This proposed project **violates San Diego Municipal Code, Table 131-04B, Use Regulations Table** for Residential Zones. This code specifically disallows Religious Assembly in RS 1-7 Zoning and requires a general plan amendment for this project. Additionally, the Navajo Community Plan does not adequately incorporate or consider appropriate siting of religious institutions and would also need to be revised.
- This project brings significant and **troubling traffic and environmental impacts** to our community. The project applicant expects 95% of the people attending their site to come from out of our quiet residential area, driving more cars and pollution into our neighborhood. This runs counter to the City's [Climate Action Plan](#) of reducing greenhouse gas emissions.

We urge you to vote against approving this project. It is wrong for our Del Cerro community, and wrong for San Diego.

Respectfully,

Paula Berberick
Michael Berberick
6473 Decature St.
San Diego, CA 92120

L1-1

This comment poses a series of general questions that are not specifically linked to the adequacy of the DEIR. Regarding the issue of the prior approved housing project, refer to the topical response regarding residential housing need. Refer to Master Response 5, which addresses the purposes and conclusions reached in the VMT and LMA transportation assessments.

With respect to the allowable uses on the project site, the San Diego Municipal Code (SDMC) allows projects to propose a Planned Development Permit to allow a use that is permitted by the land use plan but not allowed by the underlying zone. That process is what is proposed to permit the church on a residentially zoned site. Refer to the topical response regarding land use policy consistency as it relates to this comment on zoning and the issue regarding the appropriate siting of religious institutions in the Navajo Community Plan. As demonstrated in DEIR Section 7.1.5, Greenhouse Gas Emissions, the project would generate less GHG emissions than the 52 residences that are allowed on the project site under the current zone (as shown in DEIR Tables 7-7 and 7-8). In addition, the project would not result in significant GHG emissions and would be consistent with the City's Climate Action Plan (CAP) by implementing the GHG emissions reduction strategies outlined in the project's CAP Consistency Checklist (refer to DEIR Appendix B).

Comments

Responses

3.1.4.2 Letter L2: Christine and Ryan Dammann and Shannon Shepley (via Joe Colloca)

Letter L2

From: Joe's Gmail <jcolloca7@gmail.com>
Sent: Monday, October 17, 2022 6:51 PM
To: Holowach, Courtney <CHolowach@sandiego.gov>; Blake, Martha <MBlake@sandiego.gov>; DSD EAS <DSEAS@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; CouncilMember Jennifer Campbell <JenniferCampbell@sandiego.gov>; CouncilMember Stephen Whitburn <StephenWhitburn@sandiego.gov>; CouncilMember Monica Montgomery Steppe <mmontgomerysteppe@sandiego.gov>; CouncilMember Marni von Wilpert <MarnivonWilpert@sandiego.gov>; CouncilMember Raul Campillo <RaulCampillo@sandiego.gov>; CouncilMember Vivian Moreno <VivianMoreno@sandiego.gov>; CouncilMember Sean Elo-Rivera <SeanEloRivera@sandiego.gov>; info@kentleeforsd.com
Cc: Robin Kastner <robink3@icloud.com>; b1rchez@cox.net; yann.Renard@gmail.com; tbendrick@sbcglobal.net; dubshieh@gmail.com; lohncecoraro1@yahoo.com; kathy.connell@gmail.com; Diana Sanderson <dianasanderson@cox.net>; Deborah Black <debeebblack@gmail.com>; danielle_marie_mail@yahoo.com; kellyrookus@gmail.com; Larry Dawson <calexicolaw@sbcglobal.net>; Stephanie Summers <stephanielsummers@yahoo.com>; Sara Moten <moten.sara@gmail.com>; Karla DeCoursey <khdecoursey@gmail.com>; shannon.shepley@yahoo.com; christinekdammann@gmail.com
Subject: [EXTERNAL] Re: Comment/Response for Draft Environmental Impact Report - All People's Church Project 636444

To All Concerned:

L2-1 Short Admin update- 3 people have requested inclusion in this group's response/comments.

They are added to cc and listed below:

Shannon Shepley
 5830 Hampton Court
shannon.shepley@yahoo.com

Christine & Ryan Dammann
 6148 Arno Drive
christinekdammann@gmail.com

Thank you

L2-1

General opposition to the project is not a CEQA issue and is addressed in Master Response 6 for general opposition. The City decision makers will take into account this comment when taking action on the project.

Comments

Responses

LATE LETTER

From: Joe's Gmail <jcolloca7@gmail.com>
Sent: Monday, October 17, 2022 5:02 PM
To: Christine Dammann <christinedammann@gmail.com>
Cc: DSD EAS <DSDEAS@saniego.gov>
Subject: [EXTERNAL] Re: EIR

Hi Christine-
Yes . I sent the package in last night with v about 32 names- a couple more added now including yours.

I'll update listing and send addendum

Joe

Sent from iPhone

On Oct 17, 2022, at 15:56, Christine Dammann <christinedammann@gmail.com> wrote:

L2-1
(cont.)

This email serves as our signatures that we oppose the ALL PEOPLE's Church being built in my Del Cerro community.

Christine & Ryan Dammann
6148 Arno Drive
San Diego, CA 92120

christinedammann@gmail.com
rsdammann@me.com

Please do not allow this church to be built in our neighborhood! It will have huge negative impacts on our lives.

Thank you,

Christine & Ryan Dammann

Comments

Responses

October 16, 2022

City of San Diego Development Services Center
ATTN: Courtney Holowach cholowach@saniego.gov
1222 First Avenue
MS 501
San Diego, CA 92101

CC: Martha Blake mblake@saniego.gov
Development Services Dept dsdeas@saniego.gov
JoeLaCava@saniego.gov
JenniferCampbell@saniego.gov
StephenWhitburn@saniego.gov
MMontgomerySteppe@saniego.gov
MarnivonWilpert@saniego.gov
RaulCampillo@saniego.gov
VivianMoreno@saniego.gov
SeanEloRivera@saniego.gov
info@kentleeforsd.com

RE: Comment/Response for Draft Environmental Impact Report
Project Name: All People's Church
Project Number: 636444

To All Concerned:

L2-2 We join with fellow residents and Navajo Community Planners, Inc in response to the City of San Diego's Draft Environmental Impact Report ("Report") dated August 31, 2022 for All People's Church project ("Project") 636444.

We reside in direct proximity to or bordering the proposed location of this Project. We have responded to the Report in full context using verifiable references, thorough discussion and review of Report findings, positions, and conclusions using empirical and/or fact-based examples for substantiation.

This Project in its immense scale is seeking departure from the Community Plan and replaces a currently-approved-and-extended residential single family home housing project.

The particularly unique circumstances accompanying Project approval would, we will show:

- 1) negate housing & climate priorities made clear by city officials to the public
- 2) ignore drastic departures in community plan implementation that will usher in permanent and significantly negative environmental impact to neighborhoods

We reject the Report's positions and conclusions in several key areas and will show the facts & reasoning by which the Report justifies those conclusions as wholly inadequate and often times contradictory.

L2-2

This letter repeats the comments received during the public review period. Refer to response to comments I20-1 through I20-19. No additional responses are warranted.

Comments

Responses

L2-2
(cont.)

- 5.1.1 Existing Conditions – This is in fact incomplete. It does not include in its consideration yet another new and major project in an adjacent parcel.
- A second existing condition impacting all areas of the city as Council and Mayor have cemented into the public awareness and committed to take steps to mitigate is the housing shortage. The Project is being considered after replacing an existing and still-approved single family home project for the exact same land parcel.
- A third existing condition is the [San Diego Municipal Code Table 131-04B](#). The Use Regulations table for Residential Zones specifically disallows religious assembly in RS 1-7 Zoning – which this Report confirms will be preserved even after Project completion. This is a glaring inconsistency, contradiction, and flat out violation of San Diego Municipal Code. Additional issue here is the Navajo Community Plan does not appropriately consider or incorporate the site designation of religious institutions and would need revision.
- 5.1-10 Community Plan Consistency – Project implementation is neither consistent nor adherent to the Community Plan. Not only is the Report contradictory and meandering in its justification which we will show below, but even if it is deemed for some reason to be consistent, that triggers violation of the Municipal Code as any consistency requires preservation of the RS 1-7 zoning.
- 5.5.4 Impact 2: Neighborhood Character – this large institutional, single mass structure severely degrades and will negatively impact long-established neighborhood character – again, this impact severity is dismissed out of hand in the Report and we will have a full discussion in context of why this Report’s conclusion and path to it is severely misguided and should be entirely rejected.

Comments

Responses

L2-2
 (cont.)

The Report is quoted in this response and included in context as reference ... these Report quotes are easily identifiable in *red italics*. At times ***boldface red italics*** may be used. These are used in this response document to highlight a point or idea and not the original style of the Report.

Thank you for consideration of this response and public comment, following discussion and issues supporting analysis. We look forward to the response.

Sincerely,

Shari & Joseph Colloca
 6301 Glenmont St
jcolloca7@gmail.com

Robin Kastner & Maureen Champion
 6331 Glenmont St
robinjk3@icloud.com

Rosemary & Victor Ghosn
 5611 Raymar Ave
B1gchez@cox.net

Adeline & Yann Renard
 5608 Marne Ave
yann.renard@gmail.com

Hortencia & Ted Bendrick
 6341 Glenmont St
tbendrick@sbcglobal.net

Wendy & Dustin Jones
 6311 Glenmont St
dubshieh@gmail.com

Amy & John Pecoraro
 5640 Marne Ave
Johnpecoraro1@yahoo.com

Kathy & Bill Connell
 6321 Glenmont St
kathy.connell@gmail.com

Diana & Rich Sanderson
 5619 Raymar Ave
dianasanderson@cox.net

Deborah & Dennis Black
 5651 Raymar Ave
debeebblack@gmail.com

Danielle Black
 5618 Raymar Ave
danielle_marie_mail@yahoo.com

Kelly & Matt Rookus
 5762 Del Cerro Blvd
kellyrookus@gmail.com

Denine & Larry Dawson
 5657 Marne Ave
calexicolaw@sbcglobal.net

Stephanie & Chad Summers
 5626 Raymar Ave
stephanielsummers@yahoo.com

Sara Moten
 6535 Del Cerro Blvd
moten.sara@gmail.com

Karla & Dan DeCoursey
 5602 Raymar Ave
khdecoursey@gmail.com

Comments

Responses

L2-2
(cont.)

5.1.1 Existing Conditions

The Report does not account for the new project – yet another architectural departure from this community’s personality – similarly sprung on Del Cerro after having been in the works for some time it turns out... the 114-unit multi-use residential/commercial complex – CerroHouse at Del Cerro Blvd & Marne Ave literally bordering the Project.

Project operations and environmental reports has to account for this contingency and combined impact to resident’s daily livability, but that impact is unaccounted for in the Report. This is not an insignificant administrative detail. The reality is these projects are not mutually exclusive, yet there is no contingency studies, consideration of their size/scope or mutual proximity. The area is neither zoned for nor intended to host these large scale, large building architectural engineering designs.

These projects by themselves will negatively impact this community, let alone as a combined force. The accurate existing conditions must include this new large project directly adjacent, but is not modeled or risk-assessed. To cast aside risks unchecked development with irreversible lasting negative impact to our daily lives.

Housing

A significant existing condition and critical problem to overcome and committed to do so by San Diego Council, Mayor, public officials is a housing crisis and a need for more homes. This is an existing condition across all of San Diego per city government and housing groups.

The Project acquired the land parcel – somehow – from the previous project developer who obtained full Project approval for 24 single family homes. The Project Approval has recently been extended ... this would be a bulwark against a housing shortage where many families are seeking Single Family Homes in San Diego. We know many of them. This approved plan much closer aligned to Community Plan in scale, purpose, design and certainly is aligned with the City’s strategic call for more homes and housing options.

The All People’s Church Project is now planned for the same parcel zoned RS 1-7; this discredits and diminishes a stated city focus on housing. An approval under these circumstances displaces existing approved residential single family housing in exchange for a business opportunistically imposing itself into a community that it primarily does not serve as we’ll show in following pages.

It would also mean the City and Council will have voted AGAINST much-needed single family homes for families desiring options for them and AGAINST a step toward another housing solution for families preferring single family options to Cerrohouse apartment-style living. The question is whether this Project ought to be approved under these circumstances at this time for that particular land parcel.

To gloss over these issues is incomprehensible to our community. We submit that this Report Existing Condition section is incomplete, ad odds with the reality on the ground and to reject its conclusions.

Comments

Responses

L2-2
(cont.)

5.1-10. Community Plan Consistency

*“With regard to the principal objective of the Community Plan to maintain, enhance and encourage residential housing, the project would **maintain the existing residential land use designation and zoning on the site**. A project objective is to provide a church-owned property for an existing congregation and would involve the construction of a non-residential, religious assembly use rather than housing. Accordingly, the project has been designed to be **sensitive to the existing neighborhood**.”*

“The Project would maintain the existing residential land use designation and zoning for the site”. The institutional nature of the Project is physically represented by a massive 54,476 sqft monolithic building with a separate 71,000 sqft two level 367 space parking structure.

These structures and the business purpose they support have nothing – zero – to do with encouraging residential housing or promoting residential single family homes either in intent or implementation.

The Report states the zoning will remain residential - on the paper documents! The actual end result which is all that really matters is a community saddled with two structural monstrosities, increasing traffic and traffic flow problems into and out of Del Cerro, and an architectural and land use departure from the whole reason the community is appealing to begin with. This is classic lip service to Community Plan... takes “not being worth the paper it’s printed on” to an all-new level.

The Report even acknowledges a principal objective in the Community Plan is to “maintain and encourage residential housing” while in the next breath pledging its support for this goal by the symbolic carry-forward on paper of the residential zoning while the Project builds non-residential institutional buildings. Our collective heads are spinning wildly.

But that’s not all. The Report comes full circle to use its own project objectives list (these are fully elaborated in context on p.8 in *red italic*), as a round-about justification for #4:

4. Design the structures and site improvements to be sensitive to the existing topography and surrounding neighborhoods.

The reference to “site improvement” is not well-defined. Maybe the parking? Or a massive building? Perhaps it’s the lush landscape of trees, plants, and shrubs... camouflage for the massive building and parking structure? The Project seems to deem “site improvement” as the Project’s totality in fulfilling its own purposes. Nothing before → Now we’re here doing our work with new buildings and landscape → Site improvement. This then appears to be welded somehow onto “community plan consistency” to support the conclusion it is *“sensitive to the existing neighborhood”*. It is not.

Back in the real world we live in, approval means a 900+ seat megachurch on a residentially zoned parcel, a 300+ space parking structure, zero housing, and Plan in compliance. The Report’s ham-handed justification for consistency and sensitivity to existing neighborhoods flies in the face observable reality and impacts. In a unified voice we reject not only the abandonment of our Community Plan, but the bases of justification employed to do it.

Comments

Responses

L2-2
(cont.)

In Report's stated project objectives, #2 states,

2. Relocate to a church-owned property that has proximity to its existing congregation, including its members in City Heights, Mid-Cities, College Area, and Del Cerro.

"...has proximity to its existing congregation..." is a key objective of the Project per the Report's statements. The screen shot below was used by the Project's own traffic analysis representative in a meeting with this community on 12 OCT 2022 showing results of traffic analysis and projections based on meetings with the Project concerning its congregation & business plan.

There is an existing congregation, but it's not in Del Cerro and surrounding neighborhoods. There is no projected growth or focus here. This is crystal clear. 95% external... residents know if you go point to point in this area you don't go all the way to the freeway to do it.

The changes needed for such a massive structure plunging itself into a small residential community because a parcel of land fits their marketing plan are massively imbalanced.

The Project is a business. And this business is proposing to set up shop in our community neither having grown up integral to it, nor invested in building any identifiable roots with its residents. This business seeks to use an acquired land parcel which is zoned residential now and was so at the sale of the parcel, change the zoning post-hoc to accommodate business purposes, and then go on to serve a community-based congregation of which 95% reside external to this community in which the Project would be located. We reject this Report postulation as non-evidenced and completely unbalanced in its application.

Additionally, environmental concerns with VMT will effectively double GHGE as the travel on every day of the week will be from a distance. This is directly counter to the [Climate Action Plan](#).



Comments

Responses

L2-2
(cont.)

"With regard to the Residential Element policies, the site layout and architectural design incorporate careful planning and sensitive development features that: would create a well-defined, balanced and visually consistent design that is distinctive from the surrounding residential neighborhood; would be situated in the topographic low point of the site near the College Avenue off-ramp and setback from the adjacent, lower profile residential and commercial structures nearby;..."

A "well-defined, balanced and visually consistent design that is distinctive from the surrounding residential neighborhood." No. This characterization is simply ridiculous.

It is not "distinctive". It is wholly and entirely out of place.

Even a casual glance tells you this. Not one, but two colossal structures amid small single family residences. Distinctive? It's overwhelming. To maintain "balance and visual consistency" requires blocking out views incorporating the immediate surrounding homes and neighborhoods.

The physical imbalance obvious. Think of an aerial or eye-view at-scale picture of surrounding immediate neighborhoods with the Project design at scale inset into that neighborhood map. This is the perfect visual exercise we used to see in grade school test booklets, "Circle the object that doesn't belong..."

An 8 year old would ace that test.

The aforementioned "visual consistency" can only be realized in its own self-contained context because of the sheer difference in scale. Balanced? With what, exactly? The Report's position and statement that the Project balances with the surrounding neighborhood is a contradictory statement as we'll show in the next section of this reply.

Additionally, there are three towers that range in height, but are all far beyond the existing and apparently permanent residential zoning height restrictions by 11'-17'. The Project presents the main building at/below height restriction and the towers are not intrusive; small architectural relief accents, not a big deal.

Disagree. These are not small towers – they are large structures that will block, impair and change the aesthetic looking in from College Ave, up and across from the I-8, and out from the neighborhoods. Regardless of position, from the largest impact is on the existing homes that look straight out and will see massive obstructions at and above line of sight.

The Project promotes the massive parking structure as "below grade along College Avenue" to appease concerns over visual, character, and environmental impacts, i.e. "It'll be mostly obscured", which doesn't appear to be the case in design. These towers, though, smashing through height restrictions need to be addressed.

The height restrictions exist for a reason. Zoning is already on the block of being completely upended, but to go further and salt it by vacating Plan height restrictions besides, all the while condoning Plan consistency and sensitivity ... that is an indefensible position. We reject this conclusion and characterization of the impact and visually consistent design.

Comments

Responses

<p>L2-2 (cont.)</p>	<p>The Project's own objectives statement and institutional mission from the Report:</p> <p>3.1.1 Project Objectives</p> <p><i>The objectives associated with the project are as follows:</i></p> <ol style="list-style-type: none"> 1. Place the church/sanctuary in a central San Diego location that is both visible from and convenient to a regional freeway to facilitate church attendance. 2. Relocate to a church-owned property that has proximity to its existing congregation, including its members in City Heights, Mid-Cities, College Area, and Del Cerro. 3. Establish a place of worship that would accommodate the space needs of its staff and congregation. 4. Design the structures and site improvements to be sensitive to the existing topography and surrounding neighborhoods. 5. Address the parking needs on Sundays by constructing sufficient parking to accommodate the maximum projected parking demand. 6. Develop the church/sanctuary near where transit connections are readily available to its congregation. 7. Enhance the religious, spiritual and community-building activities, including Sunday School and adult education, through the design and character of the indoor and outdoor spaces. 8. Fulfill the institution's religious mission to be a multi-ethnic, multi-generational local church with a global vision. <p>We disagree. The Project purchased this land opportunistically and fully of its own accord only post-hoc setting about the process of seeking accommodations, changes, exceptions, bypasses.</p> <p>Residents on the other hand were taken by surprise with the approved project fading without a sound, sale of land completed, with an entirely new concept now in its place. The absence of announcements, flyers, notices, information sheet, or extended dialog – any outreach at all – created concerns about what was going on in our community and why we seemingly were being pushed into it. Residents organized and voiced the need for answers.</p> <p>In conclusion, this response shows</p> <p style="padding-left: 40px;">Our community is not currently nor projected as a center of congregational matriculation – that, or the driving habits of congregants differs from all of Del Cerro.</p> <p style="padding-left: 40px;">The Project will mainly serve other communities (basketball is always brought up, but can we finally get past this? Are we really going to balance a decision over whether the scales tip in favor of a cavernous basketball arena in Del Cerro?)</p> <p style="padding-left: 40px;">The Project and this Report represents <u>massive</u> departures from community plan realization and is forcing change in a long-established community where this level of change is not needed or being requested by the existing community and neighborhoods.</p>
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Comments

Responses

L2-2
(cont.)

5.5.4 Impact 2: Neighborhood Character

Issue 2: Would the project result in the creation of a negative aesthetic site or project?

Issue 3: Would the project result in a project bulk, scale, materials, or style which would be incompatible with surrounding development?

Del Cerro and surrounding areas residential character is long-established and it IS distinctive. It is indeed this distinctive character that led us to this community. The existing institutional sites were designed-in and grew up for the most part integral to the community and providing services for it. Typical infrastructure; typical services.

This institutional Project would be opportunistically shoehorned in to a residential-zoned parcel by a designation, but in a now-long-established community without forethought.

The Project is not visually consistent neither in design nor character with the immediate community it proposes to reside in. Not even close.

This fact is crystal clear by visually overlaying the Project plan within the black outline of the parcel at full scale as elaborated in the Report onto the Report's own Fig 2.5 Site Picture of the Del Cerro community.

The Report is incorrect- this Project does not fit with the surrounding architecture, aesthetics or neighborhood character. We all see that below plain as a sunshiny day.



Figure 2.5
Site Photograph
ALL PEOPLES CHURCH

Comments

Responses

L2-2
(cont.)

The Project is gargantuan in relation to its surroundings and misplaced for this location. Too big, over-scale, architecturally adrift from the residential mid-century character and intent.

At 54,000+ sqft, it is nearly 14% LARGER than a football field! A single build structure plopped into residential neighborhood – 14% larger than a football field? Let that sink in.

Neighborhood Character Impact

The Report’s justification basis and *“less-than-significant-impact”* relies more on the massive institutional and university design complexes clear across the 8-lane California Interstate-8. The Report classifies and contextualizes these structures as part of our neighborhoods. We live here. They are certainly not in our contiguous neighborhoods.

This fact is worth repeating. This Project purchased land zoned as single family home residential then proposes to seek approval to ignore that intended purpose. To satisfy “less than significant impact” to neighborhood character, the Project Report assigns our residential profile to **institutional complexes** – far apart from our community. Incredible.

The Report’s rationalization is essentially that “views going north on College Ave are minimal viewing... it’s the southbound view with most visual impact”. Our personal experience living here is opposite – from visiting friends and family comments looking in.

We can assure you heading into the community, not one time did any look behind to compare the neighborhood profiles around them to SDSU or Alvarado hospital to the south.

Our community character is based of course on our people and naturally on the distinctive visual appeal of our neighborhoods looking INTO our community. We do not agree with, “... on your exit note the symmetry to large institutional buildings over yonder.”

Professionals agree. As we see from a sketch of a home design from the home build approved project for this parcel, there was no mistaking it:

“...The design ‘concept is based on the mid-1960s architecture of the surrounding homes’...”

Institutional buildings and “southbound impact view” is not and never was part of our neighborhood character.



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Large windows, flat roofs
The “largely one-story” homes priced in the “high \$600,000s” will be built on 5000-square-foot lots. The three-bedroom, three-bathroom homes will be 1800, 2000, or 2275 square feet. The design “concept is based on the mid-1960s architecture of the surrounding homes with large windows, open floor plans, flat and shallow-pitched roofs, and large windows,” said Peuler.

Comments

Responses

3.1.4.3 Letter L3: Cathleen Elmies

Letter L3

From: Cathleen E <cathleenelmies@gmail.com>
Sent: Monday, October 17, 2022 6:39 PM
To: DSD EAS <DSD EAS@sanidiego.gov>
Subject: [EXTERNAL] All Peoples Church/No 636444

L3-1 I'm writing in as a San Diego resident who lives on Del Cerro Blvd and is against the construction of a mega church in this neighborhood. There is simply NO infrastructure to support the increased traffic that this church, along with a six story apartment building going up in the area, will bring to the community. Traffic will be an absolute nightmare at the intersection of College and Del Cerro Blvd if this project proceeds. There are NO U-turns permitted at the light, so how are churchgoers going to exit the area to get back on the freeway? Are they all going to be driving through the neighborhoods, trying to find a place to turn around? That creates its own dangers to homeowners and pedestrians. But most likely there will be a huge increase in illegal U-turns, creating more traffic accidents/injuries/deaths. DO NOT LET OUR NEIGHBORHOOD BECOME A TRAFFIC CATASTROPHE. The land was zoned for 25 homes, not a 900 seat mega church. There is no infrastructure to support this, therefore the project should not proceed.

L3-1

These comments do not address the content or conclusions reached in the DEIR. Refer to Master Responses 2, 3, 5 and 6 addressing cumulative impacts, residential housing policy, transportation, and general opposition to the project.

Comments

Responses

3.1.4.4 Letter L4: Theresa Golden

Letter L4

From: Theresa Golden <tmgolden8@gmail.com>
Sent: Tuesday, October 18, 2022 6:55 PM
To: info@kenteeforsd.com; CouncilMember Sean Elo-Rivera <SeanEloRivera@sanidiego.gov>; CouncilMember Vivian Moreno <VivianMoreno@sanidiego.gov>; raulcampilo@sanidiego.gov; marnivorwilpert@sanidiego.gov; Councilmember Monica Montgomery Steppe <mmontgomerysteppe@sanidiego.gov>; Councilmember Stephen Whitburn <StephenWhitburn@sanidiego.gov>; Councilmember Jennifer Campbell <JenniferCampbell@sanidiego.gov>; CouncilMember Joe LaCava <JoelaCava@sanidiego.gov>; Holowach, Courtney <CHolowach@sanidiego.gov>; Blake, Martha <MBlake@sanidiego.gov>; DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] SAVE DEL CERRO!

L4-1 I hope this email finds you well, I am both a resident of Del Cerro, a parent, and a nurse practitioner in the field of pediatrics. I have sincere and significant concerns for the All Peoples Church Mega Project. Given the implication this has not only on our community and our impressionable minds of the youth in our neighborhood and the youth at SDSU. I could spend quite a lot of time going over the psychiatric maturity of the entering freshman of SDSU and the purpose of All Peoples Church gleaming young minds into this forum which is quite inappropriate.

Second, the housing crisis in SD, this also changes the housing plan for this community. Not only is the exit backed up on regular school year days, but adding a church with it's 900 capacity auditorium will need a second entry and exit ramp for the freeway.

Thirdly, this is in violation of the San Diego Municipal Code which depicts Religious assembly in an RS Zone 1 territory. Therefore, religious institution codes would need to be revised promptly.

Lastly, as spoken before, this 900 person auditorium alone will attract too many people, clogging roadways and exit ramps. Environmental concerns for greenhouse gas emissions in this community is potentially doubling the emissions in this area which would not only be bad for the environment but for the children of this neighborhood, with asthma being another diagnosis on the rise in San Diego county.

Thank you for your consideration on declining and canceling the All Peoples Church from entering our community.

Theresa Golden

L4-1

This comment does not address the content or conclusions reached in the DEIR. Refer to Master Responses 3, 5 and 6 regarding City residential housing policy, the project's consistency with City land use policies and the transportation effects on College Avenue, and general opposition to the project. As shown in DEIR Section 7.1.5, the project would not result in significant greenhouse gas emissions and would be consistent with the City's Climate Action Plan (CAP) by complying with the various greenhouse gas emissions reduction strategies outlined in the project's CAP Consistency Checklist (refer to DEIR Appendix B).

Comments

Responses

3.1.4.5 Letter L5: Annemarie Penick

Letter L5

From: Annemarie Penick <12apenick@gmail.com>
Sent: Monday, October 17, 2022 5:15 PM
To: Holowach, Courtney <CHolowach@saniego.gov>
Subject: [EXTERNAL] All Peoples Church Mega Project

L5-1 Dear Courtney Holowach,
I'm writing to you regarding my strong opposition to the All Peoples Church Mega Project. I've been a Del Cerro resident and home owner since 1996. I'm opposing the construction of the All Peoples Church as I have the following concerns regarding this mega project moving forward.

- 1) San Diego is experiencing a severe housing crisis. This land has already been approved for 24 housing units – which are desperately needed. This is a viable alternative project that makes more sense to the community and to the city. **By approving this project, you are basically voting NO on housing.**
- 2) Without a general plan amendment - This project would be in violation of San Diego's Municipal Code. According to the San Diego Municipal Code, Table 131-04B, Use regulations for Residential Zones, specifically disallows Religious Assembly in RS 1-7 Zoning.
- 3) The project applicant has admitted they expect 95% of the people attending their site to come from out of the area, and then leave the area. This will greatly impact greenhouse gas emissions – in essence doubling these emissions. This runs counter to the City's Action Plan of reducing greenhouse gas emissions.

I urge San Diego City Councilmembers to please vote NO on this project. Our community, our city, our planet thanks you!

Annemarie Penick
6435 Brynwood Way
San Diego, CA 92120

L5-1

This comment does not address the content or conclusions reached in the DEIR. Refer to Master Responses 3 and 6 regarding City's residential housing policy, the project's consistency with City land use policies and general opposition to the project. As shown in DEIR Section 7.1.5, the project would not result in significant greenhouse gas emissions and would be consistent with the City's Climate Action Plan (CAP) by complying with the various greenhouse gas emissions reduction strategies outlined in the project's CAP Consistency Checklist (refer to DEIR Appendix B).

Comments

Responses

3.1.4.6 Letter L6: David and Celeste Schwartz

Letter L6

From: David F. Schwartz <dfschwartz@gmail.com>
Sent: Monday, October 17, 2022 5:51 PM
To: Teri Cantor <hairiamteri@cox.net>
Cc: DSD EAS <DSEAS@saniego.gov>; CouncilMember Joe LaCava <JoeLaCava@saniego.gov>; Councilmember Jennifer Campbell <JenniferCampbell@saniego.gov>; Councilmember Stephen Whitburn <StephenWhitburn@saniego.gov>; Councilmember Monica Montgomery Steppe <montgomerysteppe@saniego.gov>; CouncilMember Marni von Wilpert <MarnivonWilpert@saniego.gov>; CouncilMember Raul Campillo <RaulCampillo@saniego.gov>; Councilmember Vivian Moreno <VivianMoreno@saniego.gov>; CouncilMember Sean Elo-Rivera <SeanEloRivera@saniego.gov>; Holowach, Courtney <CHolowach@saniego.gov>; Blake, Martha <MBlake@saniego.gov>
Subject: [EXTERNAL] Re: PUBLIC COMMENTS: All Peoples Church / No. 636444

L6-1 Thanks for your texts, Teri. I'm resending so you can register your public comment by replying to the original recipients.

David

On Oct 15, 2022, at 10:28 AM, David F. Schwartz <dfschwartz@gmail.com> wrote:

To The City of San Diego:

We are thirty-three year residents of Del Cerro and are writing to voice our strong opposition to the project known as the All Peoples Church. We find the Environmental Impact Report (EIR) lacking for a number of reasons which we will articulate as briefly as possible.

In 8.4.1.1 and 8.4.2.1, the report indicates that the proposed site of the church is not a designated view corridor and that there would be no impact to a designated scenic vista if the project is completed. This is somewhat circular reasoning and suggests that open space, in and of itself, is not a scenic resource. We respectfully disagree.

Del Cerro is a relatively sleepy, peaceful, residential neighborhood. The Community Plan ensures that it will stay that way. The proposed site provides a natural, unobstructed, uncluttered expanse which is consistent with the nature of the community. It gives a sense of distance from highway. That has value to the residents which will be destroyed by using the open space for a large project.

Del Cerro is not highly developed and the residents, by a wide margin, do not want it to be highly developed. Filling a canyon with a 54,476 square foot church and 71,010 square foot parking structure changes the visual quality and neighborhood character in ways which the EIR simply does not address. The fact that the location isn't a designated view corridor does not mean that the location doesn't provide a view.

That area is, in some ways, the "front porch" of the community. We are a quiet, somewhat concealed neighborhood, tucked away in central San Diego: one of the most desirable communities in the city. Approving the project will turn the area into something much busier and less desirable than what we know and love as Del Cerro. This is particularly true in light of the proposed construction of a six-story apartment complex just around the corner from the proposed church: another unwanted variation from the community plan.

If our elected representatives are unable or unwilling to protect our neighborhoods as the residents of these communities choose, then these representatives are not serving the people who elected them.

L6-1

This comment identifies several issue areas for which topical responses have been prepared. Refer to Master Responses 1, 3, 4, and 5 pertaining to alternative location or use, neighborhood character, transportation -trip generation rate, transportation- vehicle miles traveled screening, transportation – College Avenue operational, and residential housing need. With respect to GHG emissions and potential impacts, as demonstrated in DEIR Section 7.1.5, *Greenhouse Gas Emissions*, the project would generate less GHG emissions than the 52 residences that are allowed on the project site under the current zone (as shown in DEIR Tables 7-7 and 7-8). In addition, the project would not result in significant GHG emissions and would be consistent with the City's Climate Action Plan (CAP) by implementing the GHG emissions reduction strategies outlined in the project's CAP Consistency Checklist (refer to DEIR Appendix B).

Comments

Responses

L6-1
(cont)

The proposed church will also significantly impact the flow of traffic into and out of Del Cerro. Although the proposal is alleged to include only minimal activity at the church during the week, it is inconceivable that the owners will not at some point attempt to use the facility to its full capacity. What is not now proposed can be added later with little to no consideration for the residents, the community, and without meaningful public input. **Therefore, we object to the approval of the project on the grounds that the reasonably foreseeable uses of the structures exceed what is represented and considered by the EIR. The willingness of the EIR to accept at face value what the developers have represented demonstrates a failure of the review process and unreasonably favors applicants who wish to deviate from a community plan for their own purposes.**

We find that the EIR's assessment of traffic impact is sorely lacking in a number of respects. First and foremost, it is inconceivable that the Church does not anticipate growth of its congregation as a result of being in a larger facility. More congregants equals more revenue. **The failure of the EIR to anticipate congregation growth is a fatal flaw in the review process and represents a failure to anticipate reasonably foreseeable uses of a project which already deviates from the Community Plan. Accepting the current membership of the Church as its guide, the EIR contains, on its face, an undercounting of potential congregants and a flawed assessment of the project's impact on the community.**

Traffic on College Avenue and traffic entering and exiting Highway 8 will be significantly impacted by having a light-controlled intersection so close to the entrance and exit ramps. The westbound Highway 8 exit at College Avenue is already difficult to navigate as there is a short lane to allow traffic exiting Highway 8 to merge onto College Avenue. An intersection just off the freeway will not only make it more difficult to merge onto College, but will also result in the backup of traffic on the exit ramp and, potentially Highway 8 itself.

Notably, the light controlled intersection would have the unusual distinction of being built simply for the benefit of a single business. That is an irresponsible use of land, public funding, tax dollars, and City investment of time and resources. We are unable to identify any other light controlled intersections in this area which only serve one business.

If this project were serving the existing residents of the community, perhaps the analysis would be different. It's possible there would be more community support for it. In fact, The Local Mobility Analysis Report indicates that only about 2% of the congregation of the Church lives in the 92120 zip code. Approval of the project would run counter to the City's Climate Action Plan to reduce greenhouse gas emissions.

Additionally, in the midst of the housing crisis the City is attempting to address, it would be an act of pure hypocrisy to take this land, which is approved for a 24-unit housing development, and hand it to a church, instead. There is simply no justification for approval of a project which will have such a great impact on the community but which, because of its religious purpose, will contribute zero revenue in the form of property taxes to support itself and the surrounding community. This is especially relevant given the negligible percentage of Church members which are actually part of this community.

The City should decline to approve this project for all the reasons stated above. It's a project which isn't consistent with the community plan, would remake and redefine the entrance to our neighborhood, increase traffic congestion, run counter to the City's Climate Action Plan and attempts to address a housing shortage, and would burden the area with a business serving people who do not live in and contribute to the community.

This letter has been copied to many residents of the 92120 zip code who are invited to copy, paste, and use the contents to voice their opposition to this project and register their views as public comments.

Respectfully submitted,

David F. Schwartz
Celeste P. Schwartz
(619) 589-2440

Comments

Responses

INTENTIONALLY BLANK

ALL PEOPLES CHURCH PROJECT FINAL ENVIRONMENTAL IMPACT REPORT

SCH No. 2021100394; PROJECT No. 636444

JULY 2023

Prepared for:

City of San Diego
Development Services Department
Land Development Review
1222 First Avenue, MS 501
San Diego, CA 92101-4155

ALL PEOPLES CHURCH FINAL ENVIRONMENTAL IMPACT REPORT

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ABBREVIATIONS AND ACRONYMS

Abbreviation/Acronym	Definition
AB	Assembly Bill
ADA	Americans with Disabilities Act
ADD	Assistant Deputy Director
ADT	average daily trips
ADU	accessory dwelling units
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
ALUCP	airport land use compatibility plan
AME	Archaeological Monitoring Exhibit
AMSL	above mean sea level
APCD	Air Pollution Control District
APN	Assessor's parcel number
BCME	Biological Construction Mitigation/Monitoring Exhibit
BI	Building Inspector
BMPs	best management practices
C&D	construction and demolition
CALGreen	California Green Building Standards
CAP	climate action plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
Caltrans	California Department of Transportation
CBC	California Building Code
CCR	California Code of Regulations
CD	construction document
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
cfs	cubic feet per second
City	City of San Diego
CM	Construction Manager
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society

Abbreviation/Acronym	Definition
CO	carbon monoxide
Community Plan	Navajo Community Plan
CPA	Community Plan Amendment
CRHR	California Register of Historic Resources
CSVr	Consultant Site Visit Record
cy	cubic yards
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
DSD	City of San Diego Development Services Department
DU	dwelling unit
EAS	Environmental Analysis Section
ED	environmental designee
EIR	environmental impact report
ESAs	Endangered species acts
ESL	Environmentally Sensitive Lands
FHWA	Federal Highways Administration
FTA	Federal Transit Administration
GHG	greenhouse gas
HAP	hazardous air pollutant
HRA	health risk assessment
HRG	Historical Resources Guidelines
I-8	Interstate 8
I-15	Interstate 15
kBtu	thousand British thermal units
kWh	kilowatt-hours
LDC	Land Development Code
Ldn	day-night average level
Leq	equivalent noise level
LMA	local mobility analysis
Lmax	highest RMS sound pressure level within a measuring period
Lmin	lowest RMS sound pressure level within a measuring period
MBTA	Migratory Bird Treaty Act
MEI	maximum exposed individual

Abbreviation/Acronym	Definition
MLD	most likely descendant
MHPA	Multi-Habitat Planning Area
MMC	mitigation monitoring coordination
MMRP	Mitigation, Monitoring, and Reporting Program
MRZ	Mineral Resource Zone
MSCP	Multiple Species Conservation Program
MTS	Metropolitan Transit System
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NOP	Notice of Preparation
NO _x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O ₃	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OHP	Office of Historic Preservation
PDP	Planned Development Permit
PI	Principal Investigator
PM	particulate matter
PM _{2.5}	fine particulate matter
PM ₁₀	respirable particulate matter
PRC	Public Resources Code
project	All Peoples Church
RAQS	San Diego County Regional Air Quality Strategy
RCP	reinforced concrete pipe
RE	Resident Engineer
RMS	root mean squared
ROW	right-of-way
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCH	State Clearinghouse
SCIC	South Coastal Information Center
SDAB	San Diego Air Basin

Abbreviation/Acronym	Definition
SDAPCD	San Diego Air Pollution Control District
SDFD	City of San Diego Fire-Rescue Department
SDG&E	San Diego Gas & Electric
SDMC	San Diego Municipal Code
SDP	Site Development Permit
SDPD	San Diego Police Department
SDSU	San Diego State University
SDUSD	San Diego Unified School District
SF	square feet/square foot
SIP	State Implementation Plan
SLF	Sacred Lands File
SO _x	oxides of sulfur
STC	sound transmission class
TAC	toxic air contaminant
TM	Tentative Map
TPA	Transit Priority Area
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UTM	Universal Transverse Mercator
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
WMP	waste management plan
VOC	volatile organic compounds
WSA	water supply assessment
WSV	water supply verification

ES. EXECUTIVE SUMMARY

This summary provides a synopsis of the All Peoples Church Project (project), the results of the environmental analysis, and project alternatives considered in this Environmental Impact Report (EIR). This summary does not contain the extensive background and analysis contained in the various sections of the EIR.

The purpose of an EIR is to inform public agency decision makers and the general public of the potentially significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project (California Environmental Quality Act (CEQA) Guidelines Section 15121(a)). This EIR is an informational document for use by the City of San Diego (City), decision makers, and members of the general public to evaluate the environmental effects of the proposed project. This document complies with all criteria, standards, and procedures of CEQA and the CEQA Guidelines and the City's EIR Guidelines (City 2005a). The City is the lead agency for the project evaluated in this EIR. This document has been prepared as a project EIR pursuant to CEQA Guidelines Section 15161. This document represents the independent judgment of the City as lead agency (CEQA Guidelines Section 15050).

ES.1 Project Location, Setting, Objectives, and Description

The approximately 6-acre project site is vacant and located in the southern portion of the Del Cerro neighborhood in the Navajo Community Plan area in the city. The project site is located approximately 11 miles east of the Pacific Ocean, 7 miles northeast of downtown San Diego, approximately 3 miles east of Interstate 15 (I-15) and immediately north of Interstate 8 (I-8). The project site is bounded by College Avenue on the west, the westbound I-8 off-ramp at College Avenue and City fee-owned open space dedicated parkland to the south, single-family neighborhoods along Marne Avenue and the western end of Glenmont Street to the east, and neighborhood commercial properties to the north fronting Del Cerro Boulevard.

The project site is previously disturbed and vacant. The project site contains 4.0 acres of sensitive biological resources, such as Diegan coastal sage scrub and non-native grassland, that are defined as Environmentally Sensitive Lands (ESL) in San Diego Municipal Code (SDMC) Section 113.0103. On-site grading appears to have been conducted in multiple phases along the western, southern and eastern edges of the site and may have occurred as part of community buildout in the late 1950's to mid-1960's during construction of the adjacent residential development to the east, College Avenue to the west, I-8 (previously Highway 80) and associated College Avenue off-ramp to the south and southwest. The vacant project site is surrounded by developed lands, with the exception of a 2-acre dedicated parkland property fee-owned by the City Parks and Recreation situated immediately to the south between the project site and the California Department of Transportation (Caltrans) right-of-way (ROW).

The project objectives for the All Peoples Church Project are as follows:

1. Place the church/sanctuary in a central San Diego location that is both visible from and convenient to a regional freeway to facilitate church attendance.

2. Relocate to a church-owned property that has proximity to its existing congregation, including its members in City Heights, Mid-Cities, College Area, and Del Cerro.
3. Establish a place of worship that would accommodate the space needs of its staff and congregation.
4. Design the structures and site improvements to be sensitive to the existing topography and surrounding neighborhoods.
5. Address the parking needs on Sundays by constructing sufficient parking to accommodate the maximum projected parking demand.
6. Develop the church/sanctuary near where transit connections are readily available to its congregation.
7. Enhance the religious, spiritual and community-building activities, including Sunday School and adult education, through the design and character of the indoor and outdoor spaces.
8. Fulfill the institution's religious mission to be a multi-ethnic, multi-generational local church with a global vision.

The following entitlements are necessary for the project:

- A Community Plan Amendment (CPA) is proposed to allow for the development of a religious assembly use within the Single-Family residential land use designation. The CPA would place a new church symbol on the Other Community Uses map, Figure 24, of the Navajo Community Plan.
- A Planned Development Permit (PDP) is required to allow a use that is permitted by the land use plan but not allowed by the underlying zone. In addition, the PDP also permits deviations from the RS-1-7 zone development regulations.
- Site Development Permit (SDP) is required for the project to impact sensitive biological resources.
- A Tentative Map (TM) is proposed to facilitate the vacation and grading of easements.
- Numerous existing easements would be vacated by the TM. Specifically, existing sewer, telecom, and stormwater easements that cross the property would be abandoned. In addition, a portion of the access rights would be revested for the proposed signalized intersection and ingress/egress driveways along College Avenue and ROW would be dedicated to the City to accommodate the proposed parkway along the project frontage with College Avenue.

The City would use information contained in this EIR and supporting documentation in its decision to approve the required discretionary permits.

ES.1.1 Site Plan and Design Features

The project consists of the construction and operation of a 54,476-square-foot (SF) church/sanctuary building and a 71,010 SF, two-level parking garage and surface parking areas on an approximately 6-acre vacant site. The proposed project would include a 900-seat sanctuary space with accessory uses (i.e., Sunday school classrooms, offices, and a multi-purpose room/gym), and various site

improvements, such as circulation, landscaping, and utility connections which are described below. Of the 900 seats, 587 seats would be fixed in place and 3,690 SF would accommodate the remaining non-fixed seats. Congregation gatherings would primarily occur on Sundays; small group activities may occur during the weekdays or on Saturdays. No primary educational school spaces are proposed as part of the project. To implement the project, several deviations from the RS-1-7 zone related to building height, retaining wall height, side yard setback, and bicycle parking are proposed.

The church/sanctuary building is designed in a contemporary Spanish Colonial Revival-style theme featuring arched entrances and windows along its painted concrete tilt-up facades, with accents of wood fascia and terra-cotta-colored tile roofing materials. The glazing for each window would be tinted bronze in color. The building would feature two levels with front and rear vestibules located on the first floor. The majority of the church/sanctuary building and its parapet wall around the flat roof areas would comply with the 30-foot height limit established in the SDMC for the RS-1-7 zone. To create visual interest, three pitched roof towers would extend from 45 to 48 feet above grade and the cross would extend an additional 8 feet above the 45-foot roof tower on the western elevation to 53 feet above grade. The additional height requires a deviation.

The two-level parking structure would be recessed into the terrain such that the top deck would be below grade of College Avenue. The lower and upper parking levels of the structure would be connected through an internal vehicle ramp. The primary surface parking lot would be constructed north of the parking structure at grade with College Avenue and connected to the upper level of the parking structure via internal roads. Smaller surface parking areas would be provided south and east of the parking structure and church/sanctuary building as shown on the project site plan (refer to Figure 3-1 in Chapter 3, *Project Description*). The parking structure would contain 203 parking spaces, while surface parking areas would hold 153 spaces, for a total of 356 parking spaces. Parking would be provided for standard vehicles, accessible vehicles, clean air vehicles, carpool vehicles, electric vehicles, motorcycles, and bicycles. The number of parking spaces for vehicles would exceed the City's minimum parking requirements of 319 parking spaces by 37 parking spaces. Refuse/recycling areas would be provided in the surface parking area east of the church/sanctuary building.

The design of the parking structure would complement the architectural style of the church/sanctuary building by featuring painted concrete walls with arched entries. The upper deck of the parking structure would feature planters with landscaping.

The proposed landscape plan features the use of native/naturalized and/or drought-tolerant plant material, whenever possible. No invasive or potentially invasive species would be used. In general, the landscape improvements along College Avenue would create a 14- to 16-foot-wide parkway featuring a 12-foot-wide shared sidewalk and street side canopy plantings and ground covers from the property line north to the private driveway. North of the private driveway, a 10- to 12-foot-wide parkway would be installed, consisting of street side canopy plantings and a 5-foot-wide sidewalk. Entry monumentation and landscape treatments would be installed on site at the southeast corner, near the driveway entrance.

Approximately 93 percent of the project site would be graded to accommodate development of the project. Approximately 16,500 cubic yards (CY) of cut and 39,000 CY of fill (including 22,500 CY of import) would be required to implement the grading plan. The maximum depth of excavation would be 25.5 feet, as measured vertically, and the maximum depth of fill would be 28 feet. To implement

the site plan and avoid the need to obtain an encroachment permit for grading into the Caltrans ROW, retaining walls are proposed along the southern and southwestern limits of grading. The walls would exceed the six-foot height limit allowed by the City's Land Development Code (LDC) and would require approval of a deviation. Landscape screening and vining species would be installed above and below the retaining walls to soften their appearance.

Vehicular access to the project and the parking structure would be via a proposed signalized full access driveway along College Avenue with a secondary gated driveway entrance connected to the northern parking lot for right-in/out only vehicle movements. Off-site improvements to the new College Avenue intersection would include creating a median break and narrowing of the existing raised median to construct a new southbound left-turn lane, striping of a northbound right-turn lane, and installing a crosswalk. A traffic signal would be installed at the proposed southern project driveway. The private driveway connection at College Avenue would descend to an entry plaza between the parking structure and the church/sanctuary building and the entrances to the proposed parking areas. An onsite loading zone would also be provided near the entry plaza. New bicycle lane signage and striping would be installed along northbound College Avenue. Along the project's College Avenue frontage, a 12-foot shared (i.e., pedestrians and bicycles) contiguous sidewalk would be installed south of the project driveway and north of the driveway a 5-foot-wide non-contiguous sidewalk would be constructed within the parkway. Canopy trees and other plant material would be installed adjacent to the sidewalks and surface parking area per City requirements. Stairs and an Americans with Disabilities Act ramp would be extended on site to link the College Avenue sidewalk to the church/sanctuary building entrance and entry plaza. Bicycle parking and storage would be provided on the project site consisting of 18 short-term spaces and 3 long-term spaces.

ES.1.2 Utilities and Other Site Improvements

Several on-site and off-site utility improvements would be required to implement the project. A 320-linear-foot, 8-inch-diameter public water main extension would be installed along College Avenue to a point of connection at its intersection with Del Cerro Boulevard. On-site improvements would include the installation of 2-inch-diameter public domestic water service connection; an 8-inch-diameter private water line for fire service; a 1-inch-diameter irrigation line; an 8-inch-diameter private gravity sewer line; and a private sewer lift station and private sewer force main. Many of these utility improvements would connect with existing public infrastructure in College Avenue, with the exception of the sewer service which would connect off site through an adjacent private residential lot via a private 4-inch-diameter sewer lateral to an 8-inch-diameter off-site public sewer main in Marne Avenue (i.e., within a private easement granted to the project). On-site stormwater runoff would be directed to four biofiltration basins and then discharged into existing storm drains and picked up by the existing headwall and public 48-inch storm drain that flows beneath I-8.

ES.1.3 Sustainable Design

The project has been designed to promote sustainability and includes cool green roofs, use of low-flow fixtures/appliances and low-flow irrigation, electrical vehicle charging stations, designated and secure bicycle parking spaces, designated parking spaces for low-emitting, fuel efficient, and carpool/vanpool vehicles, and implementation of a solid waste recycling plan. The project landscape plan also proposes to install a net increase of 92 trees to facilitate the City's Climate Action Plan

(CAP) goals for greenhouse gas emissions reduction and the enhancement of carbon sequestration opportunities.

ES.2 Environmental Analysis

This EIR contains an environmental analysis of the potential impacts associated with implementation of the proposed project. The issues that are addressed in detail in the EIR include Land Use, Biological Resources, Historical Resources, Noise, Visual Effects and Neighborhood Character, and Tribal Cultural Resources (TCRs). Based on the analysis contained in Chapter 5, *Environmental Analysis*, the project would result in the potential for significant impacts to biological resources (sensitive habitats), historical resources (unknown archaeological and religious or sacred resources, human remains); noise (construction noise); and TCRs. Measures have been identified in Chapter 5 that would reduce these project impacts to below significance with mitigation incorporated. Project impacts to land use and visual effects/neighborhood character would be less than significant, as described in Chapter 5, and as such, no mitigation for land use or visual effects and neighborhood character impacts would be required.

Chapter 6, *Cumulative Impacts*, addresses the cumulative impacts due to implementation of the proposed project in combination with past projects and future development projections. As described in Chapter 6, the project would not contribute to cumulatively considerable effects for Land Use, Biological Resources, Historical Resources, Noise, Visual Effects and Neighborhood Character, or TCRs. No mitigation for cumulative effects would be required.

As explained in Section 7.1, *Effects Found Not to Be Significant*, the project would not have the potential to cause significant impacts for the following 15 issue areas: Agriculture and Forestry Resources, Air Quality, Energy, Geologic Conditions, Greenhouse Gas Emissions, Health and Safety, Hydrology, Mineral Resources, Paleontological Resources, Population and Housing, Public Services and Facilities, Transportation, Utilities and Service Systems, Water Quality, and Wildfire.

Table ES-1, *Project Impacts and Proposed Mitigation*, summarizes the project's potentially significant direct and cumulative environmental impacts and required mitigation measures by issue, as analyzed in Chapters 5 and 6 of this EIR. The last column of the table indicates whether the impact would be reduced to below a level of significance after implementation of the mitigation measures.

ES.3 Project Alternatives

Three project alternatives are addressed in detail in this report: No Project/No Development, Reduced Residential Development Alternative, and Reduced Project Alternative. A summary of these alternatives is presented below with the detailed analysis provided in Chapter 8, *Project Alternatives*. Pursuant to CEQA Guidelines Section 15126(e)(2), the Reduced Project Alternative is identified as the environmentally superior alternative based on the fact that it would reduce the project's potentially significant, but mitigable, biological resources, historical (cultural) resources and TCR impacts by reducing the extent of grading required to implement the project. It would also increase the setback distance between construction activities and the nearby sensitive receptors, thus reducing construction noise impacts of the project.

ES.3.1 No Project/No Development Alternative

Pursuant to CEQA Guidelines Section 15126.6(e)(3)(B), the No Project Alternative is the “circumstance under which the project does not proceed.” Under the No Project/No Development Alternative for this EIR, construction of a new church/sanctuary building would not occur. The site would remain vacant. Because a new church/sanctuary building would not be constructed, this alternative would not achieve the project’s basic objectives related to relocating the facility to a church-owned property that has proximity to its existing congregation; establishing a place of worship that would accommodate the space needs of its staff and congregation; addressing the parking needs on Sundays by constructing an on-site parking structure; developing the church/sanctuary near where transit connections occur; and enhancing the religious, spiritual, and community-building activities through the design and character of the indoor and outdoor spaces.

ES.3.2 Reduced Residential Development Alternative

Under this alternative, the property would be developed with the Marburn Corporation residential subdivision which was approved by the City Council in 2018 (Project No. 435438). Similar to the project, this alternative required approval of a SDP, PDP, Easement Vacations, and TM. Similar to the project, several deviations from the LDC are needed to implement this alternative. A CPA is not required to implement the residential development. The Reduced Residential Development Alternative consists of the construction of 24 residential units, five homeowner association lots, private access to the property, and other site improvements. The alternative also includes 12-foot-high masonry walls around the site perimeter with landscape screening. Nearly the entire project site would be graded to implement this alternative.

ES.3.3 Reduced Project Alternative

In an effort to reduce the potentially significant, but mitigable, impacts associated with constructing the project, a Reduced Project Alternative is evaluated that would reduce the amount of on-site grading required to implement the project. A reduced grading footprint would, in turn, reduce the project’s potentially significant impacts to biological resources, cultural resources and TCRs. Under the Reduced Project Alternative, the project’s surface parking would be modified to comply with the City’s parking regulations, rather than constructing 37 more parking spaces than required by the City. Specifically, the Reduced Project Alternative would construct a total of 319 parking spaces, which would be 37 fewer spaces than the project provides. Surface parking for the project is proposed north of the parking structure and along the eastern edge of the parking structure and church/sanctuary building. To construct 37 fewer parking spaces, the project’s grading footprint would be reduced by approximately 0.4 acres, depending on which spaces are removed under this alternative. All other features of the project would remain the same as described in Chapter 3, *Project Description*.

ES.4 Areas of Controversy/Issues to Be Resolved

As lead agency, the City prepared and circulated a Notice of Preparation (NOP), dated October 22, 2021, to all responsible and trustee agencies, as well as various governmental agencies, including the Office of Planning and Research’s State Clearinghouse. Comments on the NOP were received

from the California Department of Fish and Wildlife, Native American Heritage Commission, San Diego County Archaeological Society, Inc., and various members of the public. Copies of the NOP and comment letters are contained in **Appendix A** of this document.

The concerns raised during the NOP process from governmental agencies and groups were primarily related to potential effects on biological, Native American, and historical resources. Additional concerns raised by the public included the existing housing shortage and the loss of potential housing associated with the CPA to allow for the development of a religious assembly use within the Single-Family residential land use designation; maintaining the single-family residential character of the project area; the project's consistency with applicable General Plan and Navajo Community Plan Elements; impacts associated with air quality, biological resources, Multiple Species Conservation Program Preserve and Multi-Habitat Planning Area, construction traffic, energy, geology, hydrology, land use, community character, noise, light, public services and facilities, toxic and human health, water quality, water supply, historical and cultural resources, cumulative effects, and climate change; the increase in traffic in the project area that would occur as a result of the project; potential use of existing vacant buildings to house the proposed use instead of constructing new structures; loss of existing, vacant land; health and safety impacts associated with traffic increases and associated air quality; wildfire threat and the addition of project cars to area roadways for emergency evacuation; and noise associated with project vehicles and events.

**Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION**

Impact	Mitigation Measures	Analysis of Significance after Mitigation
Land Use		
All land use impacts would be less than significant, and no mitigation measures are required.		
Biological Resources		
Project construction would result in significant direct and indirect impacts to sensitive habitat.	<p>BIO-1: Biological Resource Protection during Construction.</p> <p>I. Prior to Construction</p> <p>A. Biologist Verification – The owner/permittee shall provide a letter to the City’s Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City Biology Guidelines (City of San Diego 2018a), has been retained to implement the project’s biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.</p> <p>B. Preconstruction Meeting – The Qualified Biologist shall attend the preconstruction meeting, discuss the project’s biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.</p> <p>C. Biological Documents – The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.</p> <p>D. Biological Construction Mitigation/Monitoring Exhibit – The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME), which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City Assistant Deputy Director (ADD)/MMC. The BCME shall include a site plan, written and graphic depiction of the project’s</p>	<p>With implementation of mitigation measure BIO-1, impacts would be reduced to less than significant.</p>

**Table ES-1
 PROJECT IMPACTS AND PROPOSED MITIGATION**

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<p>biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.</p> <p>E. Resource Delineation – Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.</p> <p>F. Education – Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).</p> <p>II. During Construction</p> <p>A. Monitoring – All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on “Exhibit A” and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSV). The CSV shall be e-mailed to MMC on the first day of monitoring, the first week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.</p> <p>B. Subsequent Resource Identification – The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna onsite (e.g., flag plant specimens for avoidance during access, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state or federal regulations have been determined and applied by the Qualified Biologist.</p>	

**Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION**

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<p>III. Post Construction Measures</p> <p>A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, CEQA, and other applicable local, state and federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.</p>	
<p>Project construction would result in significant and direct impacts to 2.3 acres of Tier II Diegan coastal sage scrub, 0.9 acre of Tier II Diegan coastal sage scrub-disturbed, and 0.8 acre of Tier IIIB non-native grassland (a total of 4.0 acres).</p>	<p>BIO-2: Sensitive Habitats. Impacts to 4.0 acres of Diegan coastal sage scrub and non-native grassland shall be mitigated at ratios of 1:1 and 0.5:1 for impacts outside the Multi-Habitat Planning Area (MHPA) and mitigation inside the MHPA, respectively, pursuant to Table 3, <i>Upland Mitigation Ratios</i>, in the City's Biology Guidelines (City of San Diego 2018a). Mitigation shall be accomplished via payment into the City's Habitat Acquisition Fund equal to 3.6 acres of habitat.</p>	<p>With implementation of mitigation measure BIO-2, impacts would be reduced to less than significant.</p>
Historical Resources		
<p>Ground disturbance associated with the construction of the project has the potential to uncover previously unknown archaeological and Native American resources, which would be a potentially significant impact to archaeological resources.</p>	<p>HR-1: Cultural Resources (Archaeological Resources) Protection during Construction.</p> <p>I. Prior to Permit Issuance</p> <p>A. <i>Entitlements Plan Check</i></p> <ol style="list-style-type: none"> 1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process. <p>B. <i>Letters of Qualification have been submitted to ADD</i></p> <ol style="list-style-type: none"> 1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all 	<p>With implementation of mitigation measure HR-1, impacts would be reduced to less than significant.</p>

**Table ES-1
 PROJECT IMPACTS AND PROPOSED MITIGATION**

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<p>persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.</p> <ol style="list-style-type: none"> 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG. 3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program. <p>II. Prior to Start of Construction</p> <p>A. <i>Verification of Records Search</i></p> <ol style="list-style-type: none"> 1. The PI shall provide verification to MMC that a site-specific records search (0.25-mile radius) has been completed. Verification includes, but is not limited to, a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed. 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities. 3. The PI may submit a detailed letter to MMC requesting a reduction to the 0.25-mile radius. <p>B. <i>PI Shall Attend Precon Meetings</i></p> <ol style="list-style-type: none"> 1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor. 	

**Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION**

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<ul style="list-style-type: none"> a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring. <p>2. <i>Identify Areas to Be Monitored</i></p> <ul style="list-style-type: none"> a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. b. The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation). <p>3. <i>When Monitoring Will Occur</i></p> <ul style="list-style-type: none"> a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur. b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present. <p>III. During Construction</p> <p>A. <i>Monitor(s) Shall Be Present during Grading/Excavation/Trenching</i></p> <ul style="list-style-type: none"> 1. The Archaeological Monitor shall be present full time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances Occupational Safety and Health Administration safety requirements may necessitate modification of the AME. 	

**Table ES-1
 PROJECT IMPACTS AND PROPOSED MITIGATION**

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<ol style="list-style-type: none"> 2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and Section IV.A-D shall commence. 3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present. 4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSV). The CSV's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC. <p>B. <i>Discovery Notification Process</i></p> <ol style="list-style-type: none"> 1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate. 2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery. 3. The PI shall immediately notify MMC by phone of the discovery and shall submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible. 4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered. <p>C. <i>Determination of Significance</i></p> <ol style="list-style-type: none"> 1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below. 	

**Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION**

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<ul style="list-style-type: none"> a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor, and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground-disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply. c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required. <p>IV. Discovery of Human Remains</p> <p>If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (PRC) (Section 5097.98) and State Health and Safety Code (Section 7050.5) shall be undertaken:</p> <ul style="list-style-type: none"> A. <i>Notification</i> <ul style="list-style-type: none"> 1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process. 2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone. B. <i>Isolate Discovery Site</i> <ul style="list-style-type: none"> 1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be 	

**Table ES-1
 PROJECT IMPACTS AND PROPOSED MITIGATION**

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<p>made by the Medical Examiner in consultation with the PI concerning the provenance of the remains.</p> <ol style="list-style-type: none"> 2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance. 3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin. <p>C. <i>If human remains ARE determined to be Native American:</i></p> <ol style="list-style-type: none"> 1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call. 2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information. 3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes. 4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods. 5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if: <ol style="list-style-type: none"> a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR; b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN c. To protect these sites, the landowner shall do one or more of the following: <ol style="list-style-type: none"> (1) Record the site with the NAHC; 	

**Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION**

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<p>(2) Record an open space or conservation easement; or</p> <p>(3) Record a document with the County. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.</p> <p>D. <i>If human remains are NOT Native American:</i></p> <ol style="list-style-type: none"> 1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial. 2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC Section 5097.98). 3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner, any known descendant group, and the San Diego Museum of Man. <p>V. Night and/or Weekend Work</p> <p>A. <i>If night and/or weekend work is included in the contract:</i></p> <ol style="list-style-type: none"> 1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting. 2. The following procedures shall be followed: <ol style="list-style-type: none"> a. No Discoveries In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8 a.m. of the next business day. b. Discoveries All discoveries shall be processed and documented using the existing procedures detailed in Section III, During Construction, and Section IV, Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery. 	

**Table ES-1
 PROJECT IMPACTS AND PROPOSED MITIGATION**

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<p>c. Potentially Significant Discoveries If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III, During Construction, and Section IV, Discovery of Human Remains, shall be followed.</p> <p>d. The PI shall immediately contact MMC, or by 8 a.m. of the next business day to report and discuss the findings as indicated in Section III.B, unless other specific arrangements have been made.</p> <p>B. <i>If night and/or weekend work becomes necessary during the course of construction:</i></p> <ol style="list-style-type: none"> 1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin. 2. The RE, or BI, as appropriate, shall notify MMC immediately. <p>C. <i>All other procedures described above shall apply, as appropriate.</i></p> <p>VI. Post Construction</p> <p>A. <i>Preparation and Submittal of Draft Monitoring Report</i></p> <ol style="list-style-type: none"> 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met. <ol style="list-style-type: none"> a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report. b. Recording Sites with State of California Department of Parks and Recreation. The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance 	

**Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION**

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<p>with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.</p> <ol style="list-style-type: none"> 2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report. 3. The PI shall submit revised Draft Monitoring Report to MMC for approval. 4. MMC shall provide written verification to the PI of the approved report. 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals. <p>B. <i>Handling of Artifacts</i></p> <ol style="list-style-type: none"> 1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued. 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate. 3. The cost for curation is the responsibility of the property owner. <p>C. <i>Curation of Artifacts: Accession Agreement and Acceptance Verification</i></p> <ol style="list-style-type: none"> 1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable. 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC. 3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV, Discovery of Human Remains, Subsection 5. <p>D. <i>Final Monitoring Report(s)</i></p>	

**Table ES-1
 PROJECT IMPACTS AND PROPOSED MITIGATION**

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<ol style="list-style-type: none"> 1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved. 2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution. 	
<p>Ground disturbance associated with the construction of the project has the potential to uncover previously unknown religious or sacred resources, resulting in a potentially significant impact associated with religious or sacred uses.</p>	<p>Mitigation measure HR-1, as described above.</p>	<p>With implementation of mitigation measure HR-1, impacts would be reduced to less than significant.</p>
<p>Ground disturbance associated with the project has the potential to uncover previously unknown resources, including unknown human remains, resulting in a potentially significant impact.</p>	<p>Mitigation measure HR-1, as described above.</p>	<p>With implementation of mitigation measure HR-1, impacts would be reduced to less than significant.</p>

**Table ES-1
PROJECT IMPACTS AND PROPOSED MITIGATION**

Impact	Mitigation Measures	Analysis of Significance after Mitigation
Noise		
<p>Construction noise impacts would have the potential to be significant, exposing nearby residential properties to noise levels in excess of 75 dBA average at the property line of residentially zoned properties.</p>	<p>NOI-1: Best Management Practices. The following best management practices shall be incorporated into the project drawings and implemented during project construction to ensure sustained construction noise levels do not exceed 75 decibels over a 12-hour period at the nearest sensitive receivers:</p> <ul style="list-style-type: none"> • In order to reduce construction noise, a temporary noise barrier or enclosure shall be used along the property lines of adjacent residences to break the line-of-sight between the construction equipment and the adjacent residences. The temporary noise barrier shall consist of a solid plywood fence and/or flexible sound curtains attached to chain-link fencing. • Barriers such as flexible sound control curtains shall be erected around stationary heavy equipment to minimize the amount of noise on the surrounding land uses to the maximum extent feasible during construction. • Equipping of all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment. • Electrical power shall be used to run air compressors and similar power tools, where feasible. • Internal combustion engines shall be equipped with a muffler of a type recommended by the manufacturer and in good repair. • All diesel equipment shall be operated with closed engine doors and be equipped with factory recommended mufflers. • Prohibiting unnecessary idling of internal combustion engines. • Locating stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors. Constructing temporary noise barriers to screen stationary noise-generating equipment when located near adjoining sensitive land uses. • Utilization of "quiet" air compressors and other stationary noise sources where technology exists. • Control of noise from construction workers' radios to a point where they are not audible at adjacent residences bordering the project site. • Notifying of all adjacent residences of the construction schedule, in writing, and provide a written schedule of "noisy" construction activities to the adjacent and nearby residences at least 24 hours prior to initiation of construction activities that could result in substantial noise levels at outdoor 	<p>With implementation of mitigation measure NOI-1, impacts would be reduced to less than significant.</p>

**Table ES-1
 PROJECT IMPACTS AND PROPOSED MITIGATION**

Impact	Mitigation Measures	Analysis of Significance after Mitigation
	<p>or indoor living areas. This notification should include the anticipated hours and duration of construction and a description of noise reduction measures being implemented at the project site. The notification should include the telephone number and/or contact information for the on-site noise control coordinator that neighbors can use for inquiries and/or to submit complaints associated with construction noise.</p> <ul style="list-style-type: none"> • Designation of a noise control coordinator who shall be responsible for responding to any complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., bad muffler, etc.) and shall require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule. 	
Visual Effects and Neighborhood Character		
Project impacts to visual effects and neighborhood character would be less than significant, and no mitigation measures are required.		
Tribal Cultural Resources		
Ground disturbance associated with the project has the potential to uncover previously unknown resources, including unknown tribal cultural resources, resulting in a potentially significant impact.	Mitigation measure HR-1 , as described above.	With implementation of mitigation measure HR-1 , impacts would be reduced to less than significant .

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1. INTRODUCTION

1.1 Purpose and Legal Authority

This Environmental Impact Report (EIR) is an informational document intended for use by the City of San Diego (City) decision-makers and members of the general public in evaluating the potential environmental effects of the All Peoples Church (project). This document has been prepared in accordance with, and complies with, all criteria, standards, and procedures of the California Environmental Quality Act (CEQA) of 1970 as amended [Public Resources Code Section 21000 et seq.], CEQA Guidelines [Title 14, California Code of Regulations (CCR) Section 15000 et seq.], and the City of San Diego's EIR Guidelines (2005). This document represents the independent judgment of the City as lead agency (CEQA Guidelines Section 15050).

In accordance with CEQA Guidelines Section 15161 and as determined by the City, this document constitutes a "Project EIR." The project would construct a church/sanctuary building and associated site improvements on an approximately 6-acre undeveloped site in the southern portion of the Navajo Community Plan area. The project requires a Community Plan Amendment (CPA) to add church use to a residentially designated site; a Planned Development Permit (PDP) to allow deviations from the development regulations of the underlying residential zone, RS-1-7; Site Development Permit (SDP) to address sensitive biological resources onsite, a Tentative Map (TM), and an easement vacation.

This EIR provides decision makers, public agencies, and the general public with detailed information about the potential significant adverse environmental impacts of the project. By recognizing the environmental impacts of the project, decision makers will have a better understanding of the physical and environmental changes that would accompany implementation of the project. This EIR includes required mitigation measures that, when implemented, would reduce or avoid project impacts, to the extent feasible. Alternatives to the project are presented to evaluate feasible alternative development scenarios that can further reduce or avoid any significant impacts associated with the project. Refer to Chapter 8, *Project Alternatives*, for a description of the project alternatives.

1.2 EIR Scope

The public agency with the greatest responsibility for supervising or approving the project or the first public agency to make a discretionary decision to proceed with a proposed project should ordinarily act as the "lead agency" pursuant to CEQA Guidelines Section 15051(b)(1). The City is the lead agency for the project evaluated in this EIR.

This EIR contains a project-level analysis described in detail in Chapter 3, *Project Description*. A project EIR should "focus primarily on the changes in the environment that would result from the development project," and "examine all phases of the project, including planning, construction and operation" (CEQA Guidelines Section 15161). This EIR evaluates the potential short-term (during construction), long-term (operations), direct, indirect, and cumulative environmental impacts associated with the project.

This EIR is an informational document for use by the City, decision makers, and members of the general public to evaluate the environmental effects of the project. This document complies with all criteria, standards, and procedures of CEQA, the CEQA Guidelines and the City's EIR Guidelines and has been prepared as a EIR pursuant to CEQA Guidelines Section 15161. This document represents the independent judgment of the City as lead agency (CEQA Guidelines Section 15050).

1.2.1 Notice of Preparation

CEQA establishes mechanisms whereby the public and affected public agencies can be informed about the nature of the project being proposed and the extent and types of impacts that the project and its alternatives would have on the environment should the project or alternatives be implemented. Pursuant to CEQA Guidelines Section 15082, the City circulated a Notice of Preparation (NOP), dated October 22, 2021, to interested agencies, organizations, and individuals. The NOP was also sent to the State Clearinghouse (SCH) at the California Governor's Office of Planning and Research. SCH assigned a state identification number (SCH No. 2021100394) to this EIR. The NOP is intended to encourage interagency communication regarding the project so that agencies, organizations, and individuals are afforded an opportunity to respond with specific comments and/or questions regarding the scope and content of the EIR to be prepared.

Comment letters received during the NOP public scoping period expressed concerns related to land use, traffic, air quality and visual character. These concerns have been identified as areas of known controversy in the Executive Summary of this EIR. A copy of the NOP and letters received during its review are included in **Appendix A, Notice of Preparation and Comment Letters**, to this EIR.

Chapter 5, *Environmental Analysis*, and Chapter 6, *Cumulative Impacts*, of the EIR addresses in detail potentially significant direct, indirect, and cumulative environmental impacts associated with the following six topics:

- Land Use
- Biological Resources
- Historical Resources
- Noise
- Visual Effects and Neighborhood Character
- Tribal Cultural Resources (TCRs)

Project impacts with respect to Agriculture and Forestry Resources, Air Quality, Energy, Geologic Conditions, Greenhouse Gas Emissions, Health and Safety, Hydrology, Mineral Resources, Paleontological Resources, Population and Housing, Public Services and Facilities, Transportation, Utilities and Service Systems, Water Quality, and Wildfire are described in Section 7.1, *Effects Found Not to Be Significant*.

1.2.2 Project Baseline

CEQA Guidelines Section 15125 requires an EIR to include a description of the physical environmental conditions (i.e., environmental setting) for the project at the time the NOP is

published. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is “significant.” Baseline conditions for the undeveloped project site are established in Chapter 2, *Environmental Setting*.

1.3 Public Review Process

This EIR and the technical analyses it relies on are available for review by the public and public agencies for up to 45 days starting on August 31, 2022, to provide comments “on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated” (CEQA Guidelines Section 15204). The Draft EIR and associated technical appendices are posted on the City’s website:

<http://www.sandiego.gov/ceqa/draft>

The City, as lead agency, will consider the written comments received on the Draft EIR and comments made at the public hearing in making its decision whether to certify the EIR as complete and in compliance with CEQA, and whether to approve or deny the project, or take action on a project alternative.

Subsequent to certification of the EIR, agencies with permitting authority over all or portions of the project may use the EIR to evaluate environmental effects of the project, as they pertain to the approval or denial of applicable permits. CEQA Guidelines Section 15381 defines a responsible agency as all public agencies, other than the lead agency, that have discretionary approval power over the project. CEQA Guidelines Section 15386 defines a trustee agency as a state agency having jurisdiction by law over natural resources affected by a project, which are held in trust for the people of the state of California. At this time, there are no other agencies with permitting authority over the project, as described in Chapter 3, *Project Description*.

1.4 Content and Organization of the EIR

The content and organization of this EIR are in accordance with the most recent guidelines and amendments to CEQA and the CEQA Guidelines. Technical studies have been summarized within individual environmental issue sections and/or summary sections, and full technical studies have been included in the appendices to this EIR and are available for review during the public comment period.

This EIR has been organized in the following manner:

- The *Executive Summary*, provided at the beginning of the EIR, outlines the conclusions of the environmental analysis and a summary of the project as compared to the alternatives analyzed in this EIR. The Executive Summary also includes a table summarizing all identified environmental impacts, along with the associated mitigation measures proposed to reduce or avoid each impact. In addition, this section includes a discussion of areas of controversy known to the City, including those issues identified by other agencies and the public during the scoping process.
- Chapter 1, *Introduction*, provides an overview of the EIR, introducing the project, applicable environmental review procedures, and format of the EIR.

- Chapter 2, *Environmental Setting*, provides a description of the project location, an overview of the regional and local setting, and the physical characteristics (or baseline conditions) of the project site. The setting discussion also addresses the relevant planning documents and existing land use designations of the project site.
- Chapter 3, *Project Description*, provides a detailed description of the project, including its purpose, main objectives, project characteristics, project design, landscape and grading plans, circulation/access improvements, utility improvements, sustainable design features, and project construction. In addition, a discussion of discretionary actions required for project implementation is included.
- Chapter 4, *History of Project Changes*, chronicles the changes made to the project design in response to environmental concerns raised during the City's review of the project application.
- Chapter 5, *Environmental Analysis*, provides a detailed impact analysis for each environmental issue addressed in detail. For each topic, there is a discussion of existing conditions, regulatory setting, the thresholds identified for the determination of significant impacts, and an evaluation of the impacts associated with implementation of the project. Where the impact analysis demonstrates the potential for a significant adverse impact on the environment, mitigation measures that would minimize the significant effects are provided. The EIR indicates whether the mitigation measures would reduce impacts to below a level of significance.
- Chapter 6, *Cumulative Impacts*, addresses the cumulative impacts due to implementation of the project in combination with past projects and future development projections. The area of potential effect for cumulative impacts varies depending upon the type of environmental issue.
- Chapter 7, *Other CEQA Sections*, addresses environmental issues determined not to have the potential for significant adverse impacts as a result of the project. The section further addresses growth inducement and significant unavoidable impacts of the project; and significant irreversible environmental changes that would result from the project, including the use of nonrenewable resources.
- Chapter 8, *Project Alternatives*, provides a description and evaluation of alternatives to the project. This section addresses the mandatory "No Project" alternative, as well as development alternatives that would reduce or avoid the project's significant impacts.
- Chapter 9, *Mitigation Monitoring and Reporting Program*, contains the mitigation monitoring and reporting program (MMRP) for the project.
- Chapter 10, *References Cited*, contains the source materials and document references relied upon in the EIR analysis.
- Chapter 11, *Certification*, lists all individuals that participated in the preparation of this EIR.

2. ENVIRONMENTAL SETTING

This section provides a description of the existing physical conditions for the project site, as well as an overview of the planning context for the All Peoples Church (project). Details relative to the environmental setting for each environmental issue are provided at the beginning of each impact area presented in Chapter 5, *Environmental Analysis*.

2.1 Project Location

The approximately 6-acre project site is vacant and located in the southern portion of the Del Cerro neighborhood in the Navajo Community Plan area in the City of San Diego (City). The project site is located approximately 11 miles east of the Pacific Ocean, 7 miles northeast of downtown San Diego, approximately 3 miles east of Interstate 15 (I-15) and immediately north of Interstate 8 (I-8; refer to **Figure 2-1**, *Regional Location*, and **Figure 2-2**, *Project Location and Vicinity*). The project site is bounded by College Avenue on the west, the westbound I-8 off-ramp at College Avenue and City open space to the south, single-family neighborhoods along Marne Avenue and the western end of Glenmont Street to the east, and neighborhood commercial properties to the north fronting Del Cerro Boulevard. Regionally, the project site can be accessed from I-8 via the College Avenue interchange, while local access to the site is provided by College Avenue south of Del Cerro Boulevard. The California Department of Transportation (Caltrans) right-of-way (ROW) for the I-8 interchange occurs along the southern property line of the project site.

2.2 Existing Site Conditions

The approximately 6-acre project site consists of one legal lot (Assessor's Parcel Number [APNs] 463-010-10-00). The previously disturbed, and vacant project site is located within the RS-1-7 Zone and designated for Residential (Single-family) use by the Navajo Community Plan (refer to **Figure 2-3**, *Existing Zoning*, and **Figure 2-4**, *Community Plan Land Use*). The project site is in the Airport Land Use Compatibility Overlay Zone and Airport Influence Area (AIA) Review Area 2 for Montgomery Field, as depicted in the airport land use compatibility plan for the airport (San Diego Regional Airport Authority 2010). The project site is not located within or adjacent to a City of San Diego Multiple Species Conservation Program (MSCP) Multi-Habitat Planning Area (MHPA) (City of San Diego 1997). Several utility easements occur on the project site although the site is not currently served by utilities.

The project site contains 4.0 acres of sensitive biological resources, such as Diegan coastal sage scrub and non-native grassland, that are defined as Environmentally Sensitive Lands (ESL) in San Diego Municipal Code (SDMC) Section 113.0103. The site is not located within or near a 100-year floodplain. Topographically, the project site is generally lower in elevation than College Avenue, the I-8 westbound off-ramp, and the surrounding neighborhoods and community; the property elevations range from a high of 450 feet above mean sea level (AMSL) near the northern boundary to a low of 365 feet AMSL below the off-ramp. Based on historical aerial photographs dating back to the 1950s, portions of the site were previously graded to create its current topographic configuration. On-site grading appears to have been conducted in multiple phases along the western, southern and eastern edges of the site and may have occurred as part of community buildout in the late 1950s to mid-1960s during construction of the adjacent residential development to the east, College Avenue to the west, I-8 (previously Highway 80) and associated College Avenue

off-ramp to the south and southwest. Undocumented fill on the order of 2 to 30 feet deep were placed across the majority of the site as part of these prior grading activities (Advanced Geotechnical Solutions 2020). As such, the site's natural topography has been historically altered over time and no naturally occurring steep slopes occur on site. Refer to **Figure 2-5, Site Photograph**, which illustrates the current site conditions, **Figure 2-6, Existing Site Topography**, which illustrates the topography, and **Figure 2-7, Geologic Cross-Sections**, that shows the presence of artificial fill across large portions of the property.

The southern portion of the project site is located within a 2035 Transit Priority Area (TPA), as mapped by the San Diego Association of Governments (SANDAG) in accordance with Senate Bill (SB) 743 (City of San Diego 2019). Transit facilities that occur within a 0.5-mile walking distance of the project site include four bus stops. Specifically, two bus stops occur along College Avenue just north of Del Cerro Boulevard, and two bus stops are situated on College Avenue just south of Alvarado Road. Metropolitan Transit System (MTS) lists Bus Routes 14 and 115 within a 0.5-mile walking distance of the project site. Bus Route 14 has 60-minute headways listed for the a.m. and p.m. peak hours and Bus Route 115 has 30-minute headways listed for the a.m. and p.m. peak hours. On Sunday, Bus Route 14 does not have service and Bus Route 115 has 60-minute headways through the day. The San Diego State University (SDSU) trolley station is within a 1-mile walking distance of the project pedestrian access point. The Alvarado Road trolley station is over a 1-mile walking distance from the project site. Both stations are served by the Green Line trolley service operated by MTS.

2.3 Surrounding Land Uses

The vacant project site is surrounded by developed lands (refer to Figure 2-2), with the exception of a 2-acre dedicated parkland property fee-owned by the City Parks and Recreation situated immediately to the south between the project site and the Caltrans ROW. A neighborhood of single-family residences, neighborhood commercial businesses, and multi-family apartment residences is located to the northeast and east of the site. A commercial gas station with carwash is located immediately to the north, while a City-operated water pump station occurs northeast along Marne Avenue, south of the commercial area and adjacent to nearby residential. College Avenue is a four-lane divided and undivided community plan circulation element road and abuts the western project boundary. Across College Avenue are undeveloped hillsides and single-family residential development. The Caltrans ROW and College Avenue/I-8 interchange abut the project site to the south and southwest. In the project vicinity south of I-8 are the SDSU main campus and College Area community. The project site is located approximately 8 miles from Montgomery Field.

2.4 Planning and Regulatory Context

The project is subject to the planning guidelines and regulatory policies of state, regional, and local agencies. The following is a brief description of the applicable planning framework which is taken into consideration in the environmental analysis contained in Chapters 5, 6, and 7 of this report.

2.4.1 State Regulations

2.4.1.1 California Building Code (California Code of Regulations, Title 24)

California law provides a minimum standard for building design through the California Building Code (CBC). The CBC is a compilation of three types of building standards from three different origins:

- Building standards that have been adopted by state agencies without change from building standards contained in national model codes;
- Building standards that have been adopted and modified from national model codes to address California's ever-changing conditions; and
- Building standards, authorized by the California legislature, that constitute amendments not covered by national model codes, that have been created and adopted to address particular California concerns.

All occupancies in California are subject to national model codes adopted into Title 24, and occupancies are further subject to amendments adopted by state agencies and ordinances implemented by local jurisdictions' governing bodies.

2.4.1.2 Assembly Bill 52 (Native American Consultation)

Assembly Bill (AB) 52 amended the California Environmental Quality Act (CEQA) to require Tribal Cultural Resources to be considered as potentially significant cultural resources. It requires that CEQA lead agencies consult with tribes that have requested consultation at initiation of the CEQA process to identify and evaluate the significance of these resources. AB 52 applies to all CEQA environmental documents for which a Notice of Preparation (NOP) was filed on or after July 1, 2015. Details on the City's consultation for this project are provided in Section 5.3, *Historical Resources*, and Section 5.6, *Tribal Cultural Resources*.

2.4.2 Regional Plans

2.4.2.1 Montgomery Field Airport Land Use Compatibility Plan

The Airport Land Use Commission (ALUC) is an agency that is required by state law to exist in counties in which there is a commercial and/or a general aviation airport. The purpose of the ALUC is to protect public health, safety, and welfare by ensuring the orderly development of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports, to the extent that these areas are not already devoted to incompatible uses. The San Diego County Regional Airport Authority (SDCRAA) serves as the ALUC for Montgomery Field.

The Montgomery Field Airport Land Use Compatibility Plan (ALUCP) established the Airport Influence Area (AIA) for this airport. Essentially, the ALUCP serves as a tool for use by the SDCRAA in fulfilling its duty to review land use development proposals within the AIA at Montgomery Field. In addition, the ALUCP provides compatibility policies and criteria applicable to local agencies in their preparation or amendment of land use plans and ordinances and to landowners in their design of

new development. The most recent version of the Montgomery Field ALUCP was amended in December 2010 (SDCRAA 2010). The project site is located within the AIA for the airport, whose airfield is approximately 7 miles to northwest.

2.4.2.2 Regional Air Quality Strategy

The San Diego Air Pollution Control District (APCD) and SANDAG are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the San Diego Air Basin. The San Diego County Regional Air Quality Strategy (RAQS) outlines the APCD's plans and control measures designed to attain the state air quality standards for ozone (O₃). The APCD has also developed the air basin's input to the State Implementation Plan (SIP), which is required under the federal Clean Air Act for areas that are out of attainment of air quality standards. The SIP, approved by the United States Environmental Protection Agency (USEPA) in 1996, includes the APCD's plans and control measures for attaining the O₃ national standard. Both the RAQS and SIP are generally updated on a triennial basis, with the latest update to the RAQS occurring in 2016, and to the SIP in 2020.

The RAQS relies on information from the California Air Resources Board and SANDAG, including mobile and area source emissions and information regarding projected growth in the County of San Diego, to project future emissions and then determine strategies necessary for the reduction of emissions through regulatory controls. The SIP relies on the same information from SANDAG to develop emission inventories and emission reduction strategies that are included in the attainment demonstration for the air basin. The SIP also includes rules and regulations that have been adopted by the APCD to control emissions from stationary sources. These SIP-approved rules may be used as a guideline to determine whether a project's emissions would have the potential to conflict with the SIP and thereby hinder attainment of the national air quality standard for O₃.

2.4.2.3 Water Quality Control Plan for the San Diego Basin

In 1994, the Regional Water Quality Control Board (RWQCB) adopted the Basin Plan, which is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan: (1) designates beneficial uses for surface and ground waters; (2) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's anti-degradation policy; (3) describes implementation programs to protect the beneficial uses of all waters in the Region; and (4) describes surveillance and monitoring activities to evaluate the effectiveness of the Basin Plan [California Water Code Sections 13240 through 13244 and Section 13050(j)]. RWQCB periodically considers changes to the Basin Plan, at a minimum of every three years, and numerous amendments have been added the Basin Plan since 1994. Additionally, the Basin Plan incorporates by reference all applicable State and Regional Board plans and policies.

2.4.3 Local Regulations

2.4.3.1 City of San Diego General Plan

The City's General Plan is a comprehensive, long-term document that sets out a long-range vision and policy framework for how the City could grow and develop, provide public services, and

maintain the qualities that define San Diego. The General Plan comprises a Strategic Framework Element along with the following elements: Land Use and Community Planning; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Conservation; Noise; Historic Preservation; and Housing. The General Plan land use map identifies the project site as Residential (refer to **Figure 2-8, General Plan Land Use**). The General Plan lays the foundation for the more-specific community plans, which rely heavily on the goals, policies, and recommendations within the General Plan. Applicable goals, policies and recommendations from the General Plan are referenced in this Environmental Impact Report (EIR), where applicable.

2.4.3.2 City of San Diego Climate Action Plan

The Climate Action Plan (CAP) serves as the City's plan for the reduction of greenhouse gas (GHG) emissions in accordance with CEQA Guidelines Section 15183.5. Adopted December 2015, the CAP includes a municipal operations and community-wide GHG emissions baseline calculation from 2010 and sets a target to achieve a 15 percent reduction from the baseline by 2020, as required by California AB 32 (City of San Diego, 2015a). The CAP sets forth common-sense strategies to achieve attainable GHG reduction targets and outlines the actions the City will undertake to achieve its proportional share of state GHG emission reductions.

Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP. In July 2016, the City adopted the CAP Consistency Checklist (checklist) to provide a streamlined review process for the analysis of potential GHG impacts from future new development. The checklist was revised in June 2017.

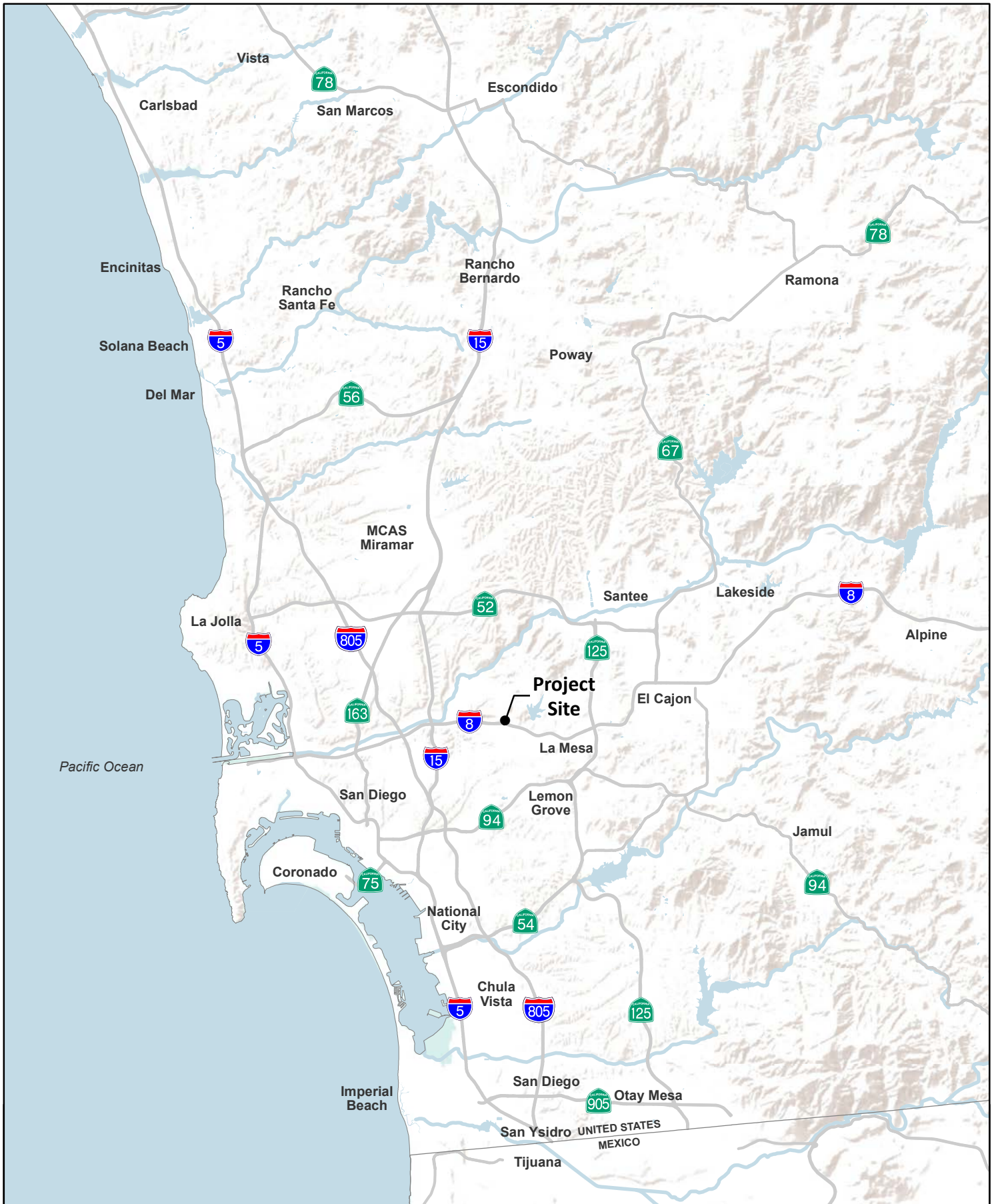
In August 2022, the City Council approved an update to the CAP to expand its approach and strategies for achieving the goal of net zero emissions by 2035 (City of San Diego 2022). As such, the 2022 CAP establishes a new goal, targets and actions that go beyond the 2015 CAP goal. The five strategies include: decarbonization of the built environment; access to clean and renewable energy; mobility and land use; circular economy and clean communities; resilient infrastructure and healthy ecosystems; and emerging climate actions. An implementation plan for the 2022 CAP is being developed by the City's Sustainability and Mobility Department to provide guidance on how to implement the new CAP strategies and measures; the implementation plan will be finalized within six to nine months of CAP adoption.

2.4.3.3 Navajo Community Plan

The project site is governed by the Navajo Community Plan (Community Plan), which was adopted by the San Diego City Council in 1982. Several amendments have occurred since its adoption, with the most recent amendment occurring in 2015. Per the Community Plan, the project site is designated for Single Family residential use as shown in Figure 4, the Community Plan's land use map. The Community Plan identifies community-serving and public uses in Figure 4 and identifies community facilities such as schools, churches, fire stations, libraries, and hospitals separately by patterns and individual symbols within Figures 23 and 24.

2.4.3.4 Land Development Code

The project site is within the RS-1-7 Zone (refer to Figure 2-3), which is intended to accommodate single-family residential uses. The RS-1-7 Zone permits a minimum lot area of 5,000 square feet (SF) and a maximum residential density of one dwelling unit (DU) for each 5,000 SF lot. Other applicable regulations contained in the City's Land Development Code (LDC) include ESL regulations (Section 113.0103), Planned Development Permit (PDP) regulations (Section 143.0401) and Site Development Permit (SDP) regulations (Section 126.0501), as described in Section 5.1, *Land Use*, of this EIR.



Sources: Esri, USGS, NOAA



Figure 2-1

Regional Location

ALL PEOPLES CHURCH

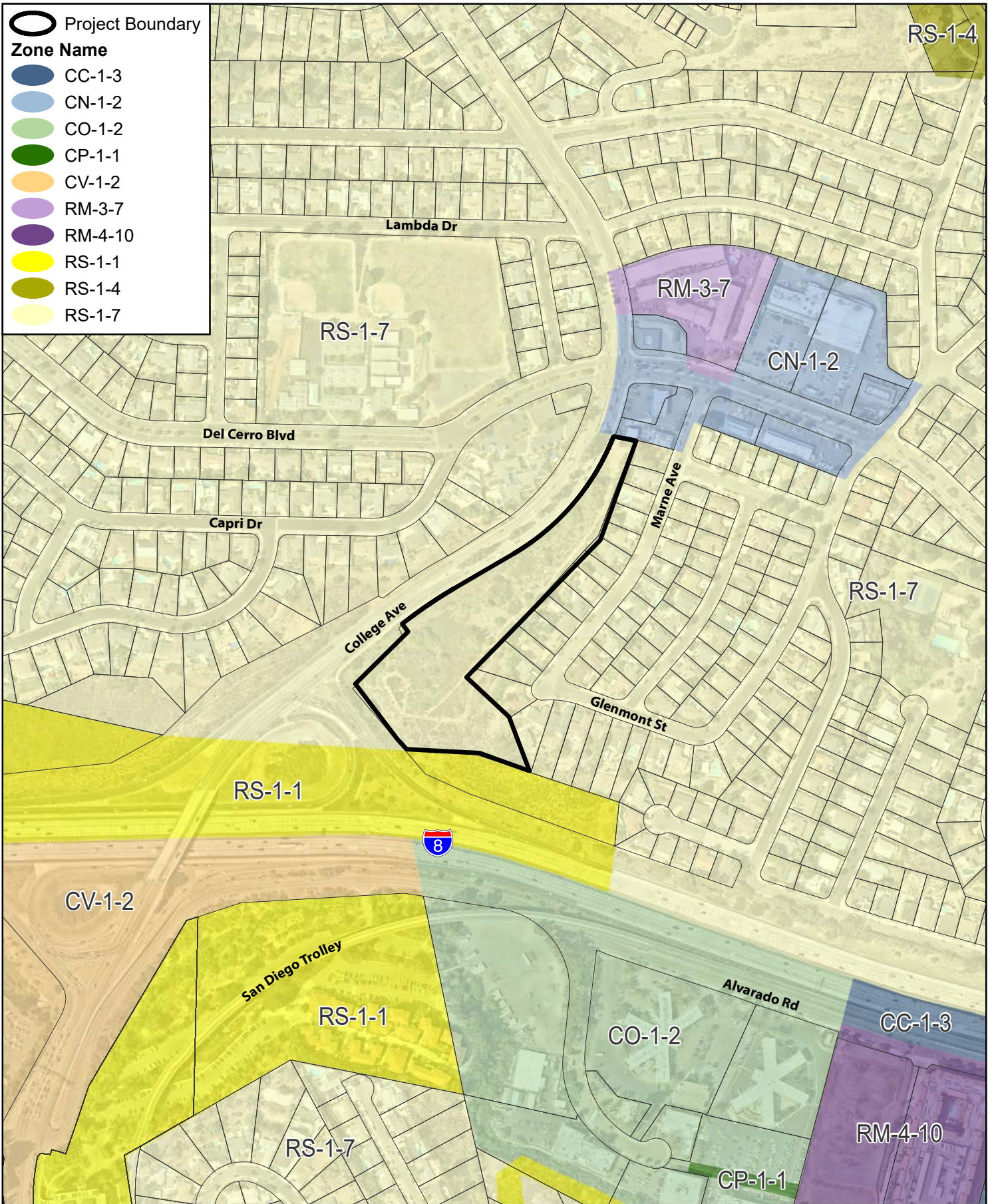


Aerial Photo: USDA NAIP 2020

Figure 2-2

Project Location and Vicinity





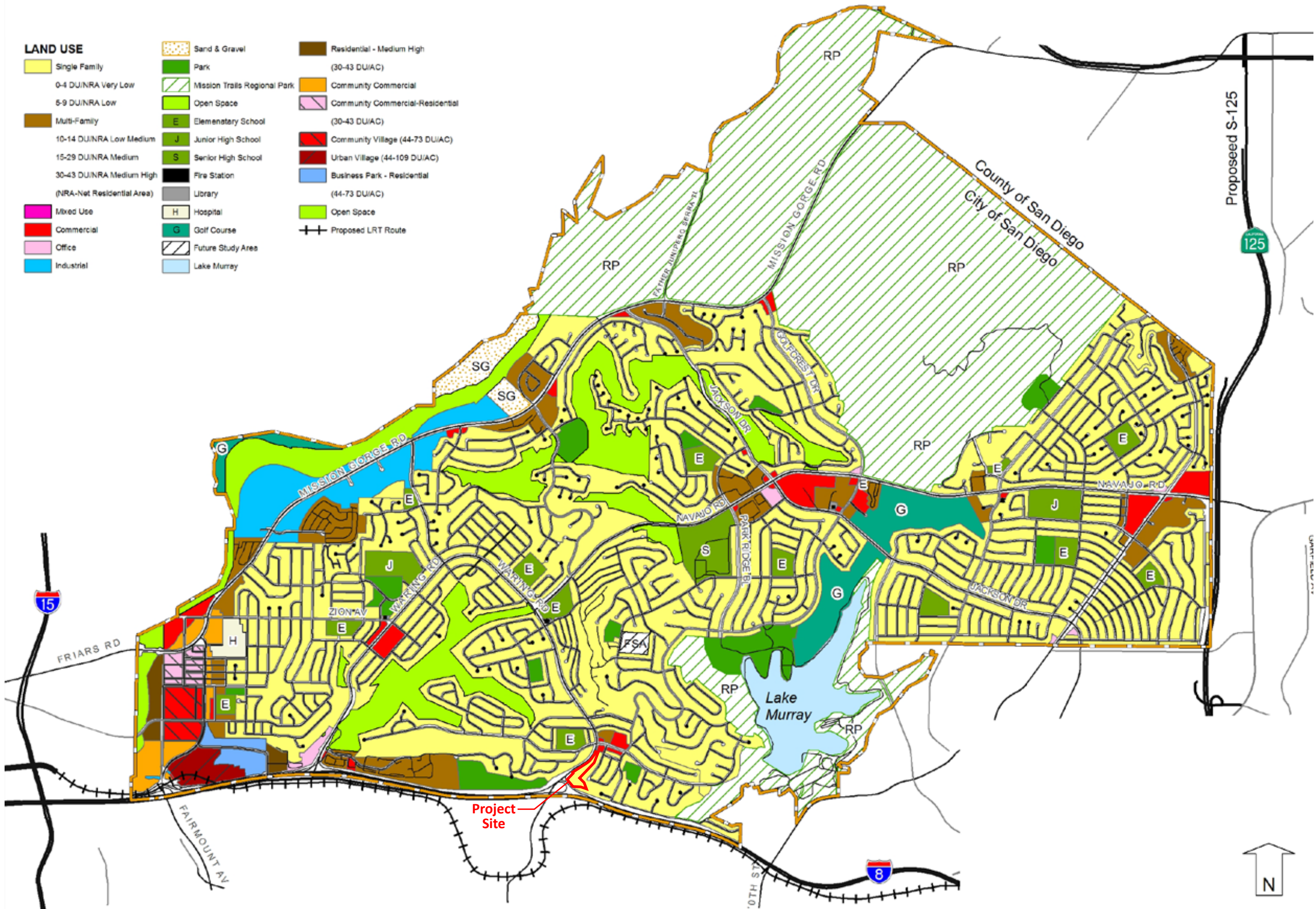
Source: SanGIS; Aerial Photo: Nearmap 2021



Figure 2-3
Existing Zoning

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LAND USE		
	Single Family	0-4 DU/NRA Very Low
	6-9 DU/NRA Low	
	Multi-Family	10-14 DU/NRA Low Medium
	15-29 DU/NRA Medium	
	30-43 DU/NRA Medium High	(NRA-Net Residential Area)
	Mixed Use	
	Commercial	
	Office	
	Industrial	
	Sand & Gravel	
	Park	
	Mission Trails Regional Park	
	Open Space	
	Elementary School	
	Junior High School	
	Senior High School	
	Fire Station	
	Library	
	Hospital	
	Golf Course	
	Future Study Area	
	Lake Murray	
	Residential - Medium High	(30-43 DU/AC)
	Community Commercial	
	Community Commercial-Residential	(30-43 DU/AC)
	Community Village (44-73 DU/AC)	
	Urban Village (44-109 DU/AC)	
	Business Park - Residential	(44-73 DU/AC)
	Open Space	
	Proposed LRT Route	



Source: City of San Diego Planning Department, Navajo Community Plan 2015

Figure 2-4

Community Plan Land Use

ALL PEOPLES CHURCH

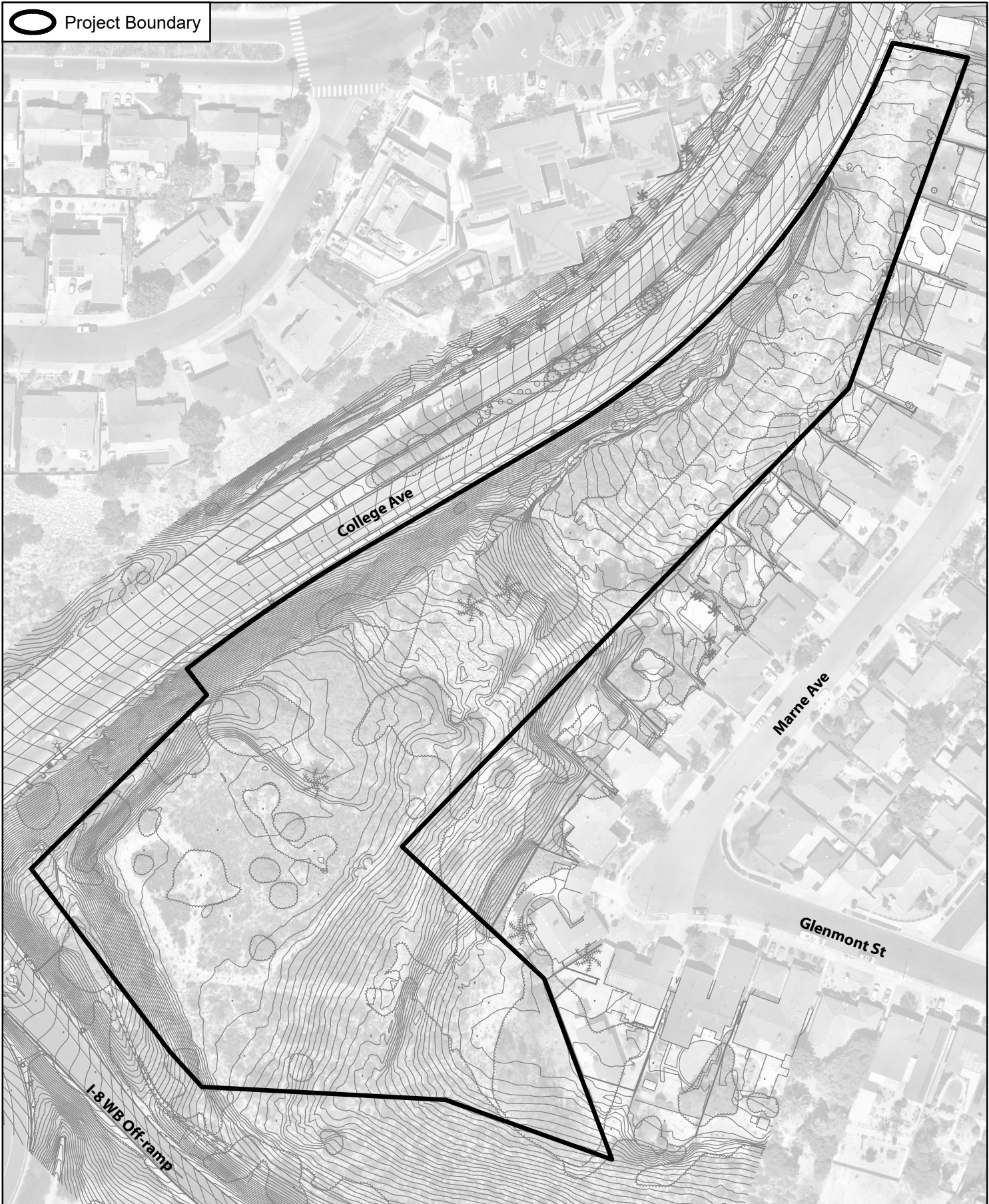
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Figure 2-5

Site Photograph

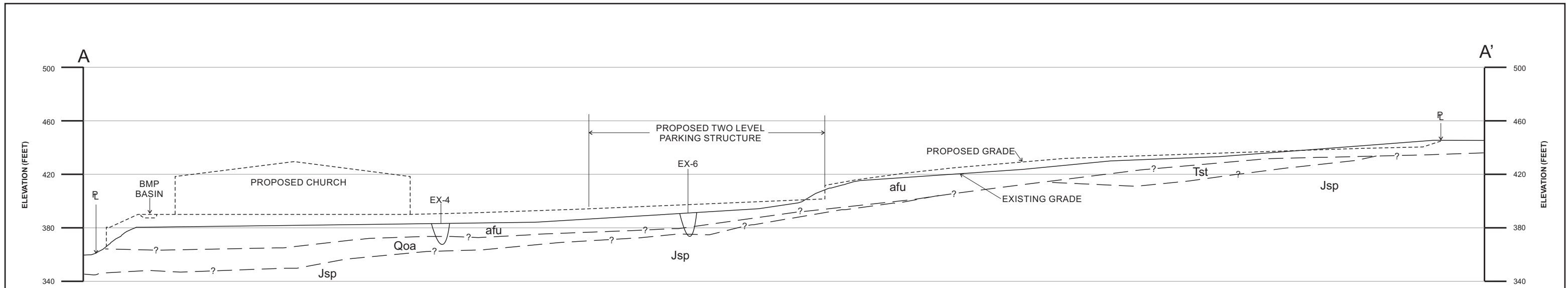
ALL PEOPLES CHURCH



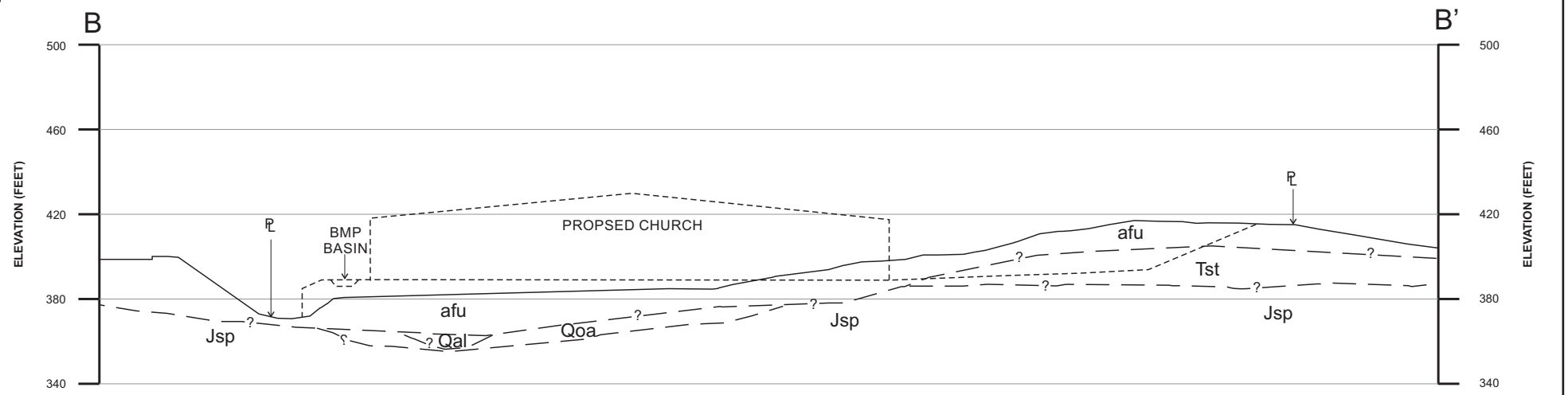
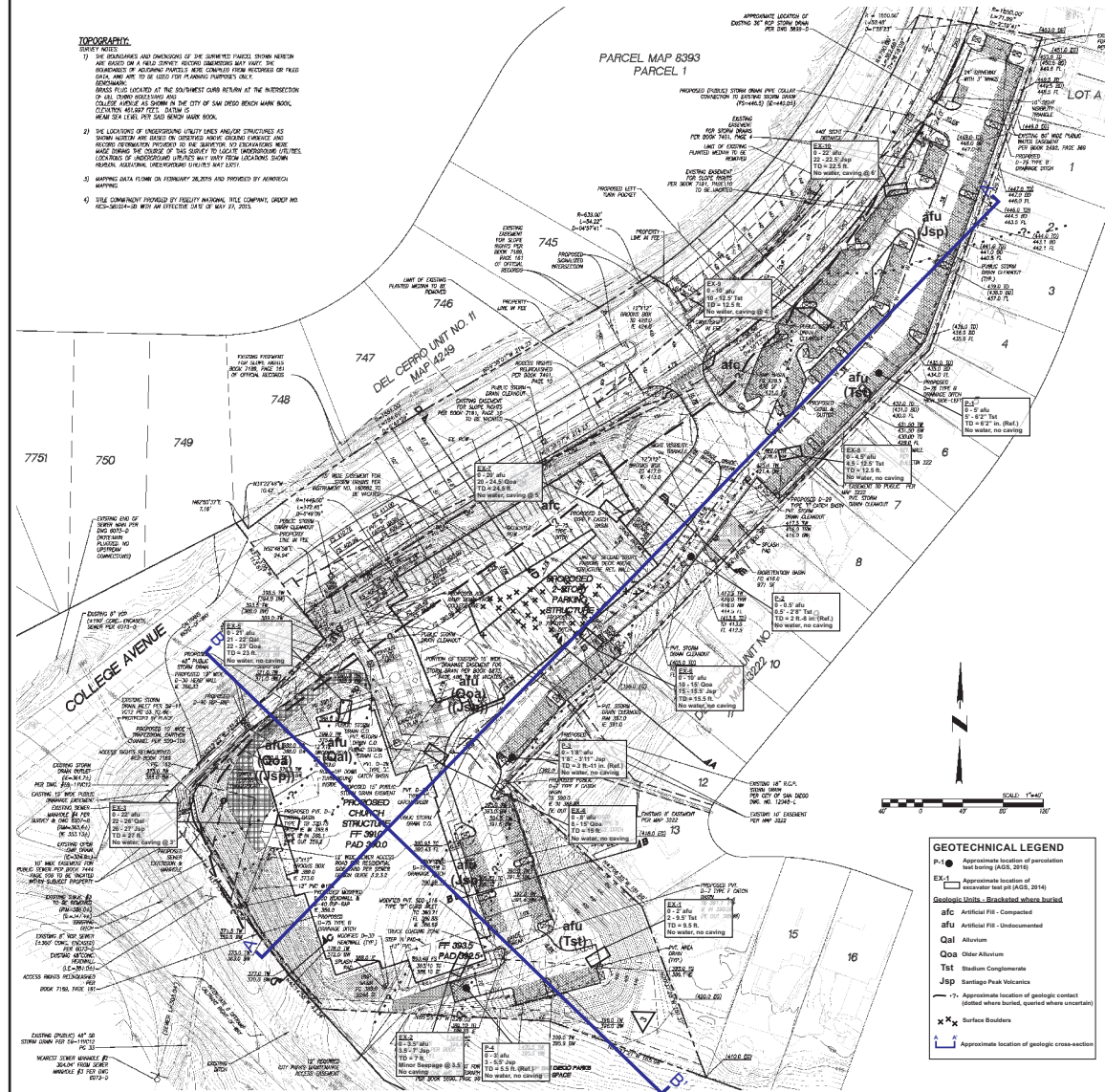
Source: Pasco Laret Suiter & Associates 2021



Figure 2-6
Existing Site Topography



CROSS-SECTION A-A'
SCALE 1"=40.0' H&V



CROSS-SECTION B-B'
SCALE 1"=40.0' H&V

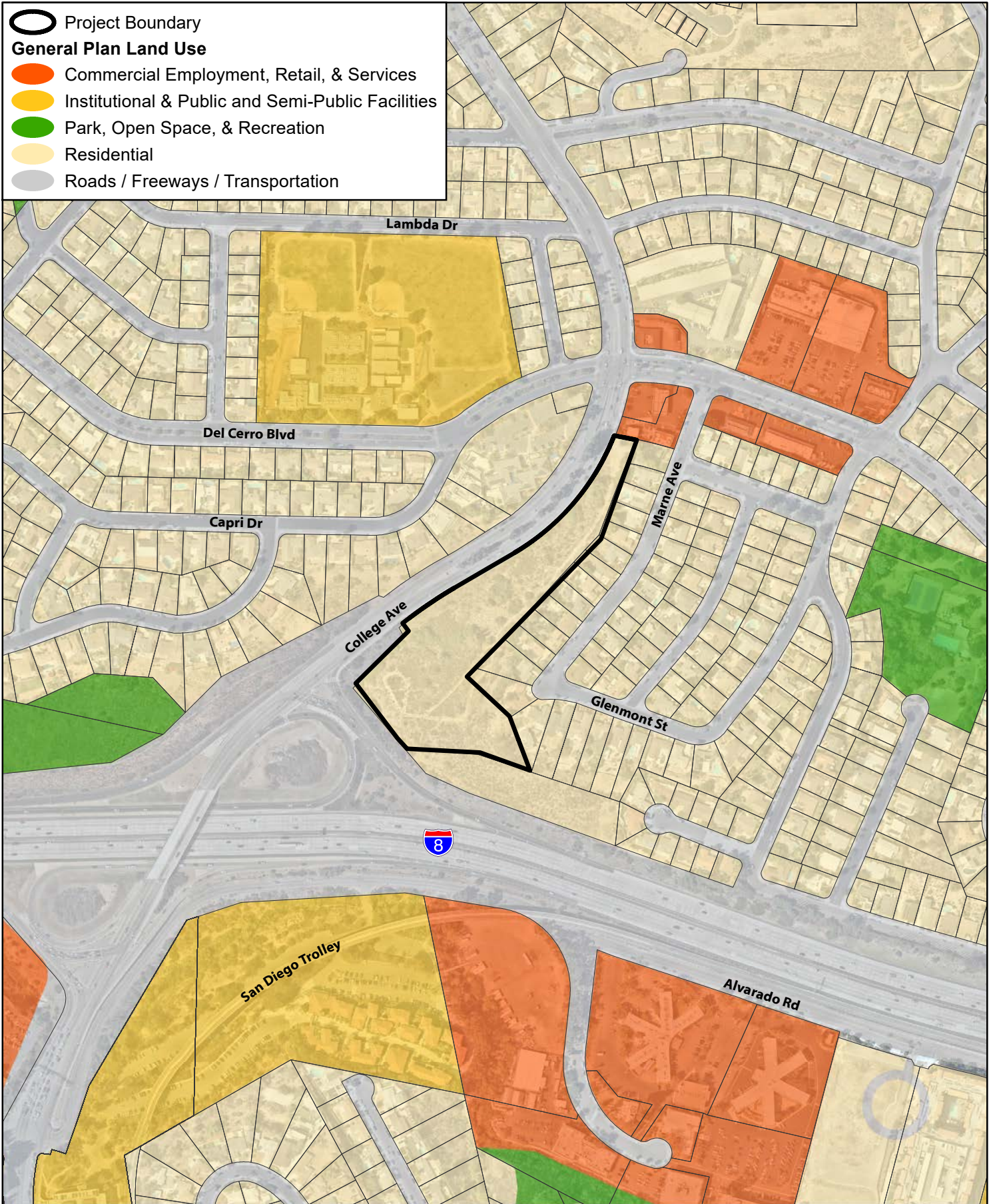
GEOTECHNICAL LEGEND

- P-1: Approximate location of penetration and boring logs (2016)
- EX-1: Approximate location of piezometer and piez (2016)
- Geotechnical Units - Borehole where banded
- afc: Artificial Fill - Compacted
- afu: Artificial Fill - Undocumented
- Qal: Alluvium
- Qoa: Older Alluvium
- Tst: Stadium Conglomerate
- Jsp: Jointed Fine Sandstone
- /-: Approximate location of geologic contact (shaded where banded, outlined where uncertain)
- x/x: Surface Boundaries
- |-: Approximate location of geologic cross-section

Source: Advanced Geotechnical Solutions 2022

Figure 2-7
Geologic Cross-Sections
ALL PEOPLES CHURCH

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Source: SanGIS; Aerial Photo: Nearmap 2021

Figure 2-8

General Plan Land Use



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3. PROJECT DESCRIPTION

This section of the Environmental Impact Report (EIR) describes the goals and objectives of the project, its specific characteristics and components, project construction, and the discretionary actions required in conjunction with project approval by the City of San Diego (City) and other agencies.

3.1 Project Objectives

The California Environmental Quality Act (CEQA) Guidelines require that the project description include a statement of the objectives sought by the project applicant. A clearly defined written statement of the objectives helps the lead agency develop a reasonable range of alternatives to evaluate in the EIR and aids decision makers in preparing findings and overriding considerations, as necessary. The statement of objectives also needs to include the underlying purpose of the project [CEQA Guidelines Section 15124(b)].

3.1.1 Project Objectives

The objectives associated with the project are as follows:

1. Place the church/sanctuary in a central San Diego location that is both visible from and convenient to a regional freeway to facilitate church attendance.
2. Relocate to a church-owned property that has proximity to its existing congregation, including its members in City Heights, Mid-Cities, College Area, and Del Cerro.
3. Establish a place of worship that would accommodate the space needs of its staff and congregation.
4. Design the structures and site improvements to be sensitive to the existing topography and surrounding neighborhoods.
5. Address the parking needs on Sundays by constructing sufficient parking to accommodate the maximum projected parking demand.
6. Develop the church/sanctuary near where transit connections are readily available to its congregation.
7. Enhance the religious, spiritual, and community-building activities, including Sunday School and adult education, through the design and character of the indoor and outdoor spaces.
8. Fulfill the institution's religious mission to be a multi-ethnic, multi-generational local church with a global vision.

3.2 Project Characteristics

3.2.1 Site Plan

The project consists of the construction and operation of a 54,476-square-foot (SF) church/sanctuary building and a 71,010 SF, two-level parking garage and surface parking areas on an approximately 6-acre vacant site. The proposed project would include a 900-seat sanctuary space with accessory uses (i.e., Sunday school classrooms, offices, and a multi-purpose room/gym), and various site improvements, such as circulation, landscaping, and utility connections which are described below. Of the 900 seats, 587 seats would be fixed in place and 3,690 SF would accommodate the remaining non-fixed seats. Congregation gatherings would primarily occur on Sundays; small group activities may occur during the weekdays or on Saturdays. No primary educational school spaces are proposed as part of the project.

The site plan illustrating the layout of the project is included as **Figure 3-1, Site Plan**. As shown in the site plan, the church/sanctuary building would be situated in the southern portion of the property with the parking garage and main surface parking lot located at grade northerly of the building. An entry plaza would be constructed between the church/sanctuary building and the parking structure. In addition to arrival and departure activities, outdoor activities in the entry plaza would be shielded from nearby residential properties by the church/sanctuary building and the parking structure. Access to the site would be via two private driveway entrances including a new signalized three-way intersection and a new secondary private gated driveway at the northern edge of the project site for right-in/right out movements along College Avenue (refer to Section 3.2.5 for a detailed description of the vehicular, bicycle, and pedestrian circulation for the project).

To implement the project, several deviations from the RS-1-7 zone related to building height, retaining wall height, side yard setback, and bicycle parking are proposed as shown in **Table 3-1, Proposed Development Deviations**. A description of the deviations is provided in this section.

**Table 3-1
PROPOSED DEVELOPMENT DEVIATIONS**

Development Regulations	Required	Proposed
Maximum Building Height Limits [San Diego Municipal Code (SDMC) §131.0431(b)]	30 feet above grade	53 feet above grade (limited to architectural projections only)
Maximum Wall Height Limits [SDMC §142.0340(d)(1)]	6 feet above grade	20 feet above grade
Minimum Building Side Yard Setbacks [SDMC §131.0431(b)]	84 feet, 2 inches	14 feet
Long-Term Bicycle Parking	16 spaces	3 spaces

3.2.2 Architectural Design

The church/sanctuary building is designed in a contemporary Spanish Colonial Revival-style theme featuring arched entrances and windows along its painted concrete tilt-up facades, with accents of wood fascia and terra-cotta-colored tile roofing materials. The glazing for each window would be tinted bronze in color. Exterior building elevations and building articulations are shown on **Figure 3-2, Exterior Elevations (East and North)**, and **Figure 3-3, Exterior Elevations (West and South)**. The building would feature two levels with front and rear vestibules located on the first floor.

With regard to the architectural design, the majority of the church/sanctuary building and its parapet wall around the flat roof areas would comply with the 30-foot height limit established in the SDMC. To create visual interest, three pitched roof towers would extend from 45 to 48 feet above grade and the cross would extend an additional 8 feet above the 45-foot roof tower on the western elevation to 53 feet above grade. These features are illustrated in the elevations in Figures 3-2 and 3-3 and would require approval of building height deviations as noted in Table 3-1. As shown in the cross-sections, the building rooflines and cross would remain below grade of the adjacent residential lots along Marne Avenue and the west end of Glenmont Street. The setback deviations are proposed due to the elongated, irregular shape of the lot relative to its frontage with College Avenue. Project cross sections are provided in **Figure 3-4, Site Sections**.

The two-level parking structure would be recessed into the terrain such that the top deck would be below grade of College Avenue. The lower and upper parking levels of the structure would be connected through an internal vehicle ramp. The primary surface parking lot would be constructed north of the parking structure at grade with College Avenue and connected to the upper level of the parking structure via internal roads. Smaller surface parking areas would be provided south and east of the parking structure and church/sanctuary building as shown on the project site plan. The parking structure would contain 203 parking spaces, while surface parking areas would hold 153 spaces, for a total of 356 parking spaces. Parking would be provided for standard vehicles, accessible vehicles, clean air vehicles, carpool vehicles, electric vehicles, motorcycles, and bicycles. The number of parking spaces for vehicles would exceed the City's minimum parking requirements of 319 parking spaces by 37 parking spaces. Refuse/recycling areas would be provided in the surface parking area east of the church/sanctuary building.

The design of the parking structure would complement the architectural style of the church/sanctuary building by featuring painted concrete walls with arched entries (as shown in **Figure 3-5, Parking Structure Elevations**). The upper deck of the parking structure would feature planters with landscaping that would exceed the requirements in the City's Land Development Code (LDC).

3.2.3 Landscape Concept Plan

The proposed landscape plan (refer to **Figure 3-6, Landscape Plan**) features the use of native/naturalized and/or drought-tolerant plant material, whenever possible. No invasive or potentially invasive species would be used. In general, the landscape improvements along College Avenue would create a 14- to 16-foot-wide parkway featuring a 12-foot-wide shared sidewalk and street side canopy, shade-producing street trees and ground covers from the property line north to the private driveway. North of the private driveway, a 10- to 12-foot-wide parkway would be installed, consisting of street side canopy, shade-producing street trees and a 5-foot-wide sidewalk.

Entry monumentation and landscape treatments would be installed on site at the southeast corner, near the driveway entrance.

Plant material would be used throughout the site to help define spaces, encourage circulation paths, highlight entry points, provide visual relief, and screen retaining walls and off-site properties. On-site landscaping would include canopy shade trees and raised box plantings on the upper deck of the parking structure, shade-producing trees in the parking areas, accent planting zones featuring palms and focal point species, and ground cover, shrubs and trees used for slope plantings. A minimum 5-foot-wide landscape buffer containing spreading ground covers, taller screening shrubs and canopy trees, ranging in height from 25 to 40 feet, would be installed between the proposed surface parking areas and residential properties to the east. The manufactured slope that would wrap around the south-facing slope below the existing neighborhood would feature extensive landscape treatments including spreading ground covers, large shrubs and canopy trees, up to 25 feet in height. The retaining walls along the southern project border would be landscaped with trees and vining species to soften and conceal their visibility. In addition, plant material would be placed within the stormwater biofiltration basins that would be constructed as part of the project (refer to Section 3.2.6) to provide stormwater management by collecting and treating runoff prior to its release off site. A portion of the existing eucalyptus woodland and Diegan coastal sage scrub located in the southeast corner of the site would be retained in place.

3.2.4 Grading Plan

Approximately 93 percent of the project site would be graded to accommodate development of the project. Approximately 16,500 cubic yards (CY) of cut and 39,000 CY of fill (including 22,500 CY of import) would be required to implement the grading plan. The maximum depth of excavation would be 25.5 feet, as measured vertically, and the maximum depth of fill would be 28 feet. To implement the site plan and avoid the need to obtain an encroachment permit for grading into the California Department of Transportation (Caltrans) right-of-way (ROW), retaining walls are proposed along the southern and southwestern limits of grading. The walls would exceed the 6-foot height limit allowed by the LDC and would require approval of a deviation. Landscape screening and vining species would be installed above and below the retaining walls to soften their appearance as shown in Figure 3-6. Grading and improvement plans would be reviewed by the City Engineer prior to site development. **Figure 3-7, Grading Plan**, illustrates the grading concept associated with implementing the project.

3.2.5 Vehicular, Bicycle, and Pedestrian Access

A Local Mobility Analysis (LMA) (Appendix J to this EIR) was conducted for the project (LOS Engineering 2022). Preparation of an LMA is required by the City to identify any off-site infrastructure improvements in the project vicinity that may be triggered with the development of the project, analyze site access and circulation, and evaluate the local multimodal network available to serve the project. An LMA evaluates and documents existing pedestrian, bicycle, and transit facilities and identifies any deficiencies in those facilities within a 0.5-mile distance of the site in the context of proposed improvements. The vehicular, bicycle, and pedestrian access improvements described below are based on the project's LMA and are incorporated into the project's site plan and improvement plans.

Vehicular access to the project and the parking structure would be via a signalized full-access driveway along College Avenue. Off-site improvements to the new College Avenue intersection would include creating a median break and narrowing of the existing raised median to construct a new southbound left-turn lane, striping of a northbound right-turn lane, and installing a crosswalk. A new traffic signal would be installed at the completed intersection. The private driveway connection at College Avenue would descend to an entry plaza between the parking structure and the church/sanctuary building and the entrances to the proposed parking areas. An on-site loading zone would also be provided near the entry plaza. A private gated driveway at the northern edge of the project site for right-in/right out movements along College Avenue would also be constructed. The project's ingress/egress plans would be required to comply with the City's street design requirements, including standards related to minimum sight distance and emergency access.

New bicycle lane signage and striping would be installed along northbound College Avenue. Along the project's College Avenue frontage, a 12-foot shared (i.e., pedestrians and bicycles) contiguous sidewalk would be installed south of the project driveway and north of the driveway a 5-foot-wide non-contiguous sidewalk would be constructed within the parkway. Canopy trees and other plant material would be installed adjacent to the sidewalks and surface parking area per City requirements. Stairs and an Americans with Disabilities Act (ADA) ramp would be extended on site to link the College Avenue sidewalk to the church/sanctuary building entrance and entry plaza.

Bicycle parking and storage would be provided on the project site consisting of 18 short-term spaces and 3 long-term spaces. A deviation is proposed to reduce the long-term bicycle parking spaces from 16 to 3 to serve the church staff since the congregation are expected to be short-term users when they bike to the project site.

3.2.6 Utilities and Other Site Improvements

Several on-site and off-site utility improvements would be required to implement the project. A 320-linear-foot, 8-inch-diameter public water main extension would be installed along College Avenue to a point of connection at its intersection with Del Cerro Boulevard. On-site improvements would include the installation of 2-inch-diameter public domestic water service connection; an 8-inch-diameter private water line for fire service; a 1-inch-diameter irrigation line; an 8-inch-diameter private gravity sewer line; and a private sewer lift station and private sewer force main. Many of these utility improvements would connect with existing public infrastructure in College Avenue, with the exception of the sewer service which would connect off-site through an adjacent private residential lot via a private 4-inch-diameter sewer lateral to an 8-inch-diameter off-site public sewer main in Marne Avenue (i.e., within a private easement granted to the project). On-site stormwater runoff would be directed to four biofiltration basins and then discharged into existing storm drains and picked up by the existing headwall and public 48-inch storm drain that flows beneath I-8.

3.2.7 Sustainable Design Features

The project would incorporate the following sustainable design features to minimize use of water, energy, and solid waste as outlined in **Appendix B, Climate Action Plan (CAP) Consistency Checklist** (Baranek Consulting Group 2021), to this EIR:

- Cool/green roofs

- Use of low-flow fixtures/appliances and low-flow irrigation
- Electrical vehicle charging stations
- Designated and secure bicycle parking spaces
- Designated parking spaces low-emitting, fuel-efficient, and carpool/vanpool vehicles
- Implementation of a solid waste recycling plan

The project landscape plan also proposes to install a net increase of 92 trees to facilitate the City's CAP goals for greenhouse gas emissions reduction and the enhancement of carbon sequestration opportunities.

3.3 Project Construction

3.3.1 Site Preparation and Demolition

Site preparation would require the removal of the existing vegetation and excess soil material, and partial demolition of the raised median and pavement within College Avenue. Typical construction equipment/vehicles required for project construction would include bulldozers, front-end loaders, scrapers, tractors, backhoes, paver/rollers, dump trucks, water trucks, and concrete mixers. Construction staging would occur within the approved project disturbance footprint and would be located as far away as possible from existing residences. The project would be constructed in a single phase, and construction is estimated to begin in late 2022 and be completed in early 2024. Demolition and construction would occur over an approximately 12- to 14-month period. It is anticipated that construction activities would occur from 7 a.m. to 7 p.m. Monday through Saturday, excluding public holidays, in accordance with SDMC Section 59.5.0404.

3.4 Discretionary Actions

3.4.1 Community Plan Amendment

A Community Plan Amendment (CPA) is proposed to allow for the development of a religious assembly use within the Single Family residential land use designation. The CPA would place a new church symbol on the Other Community Uses map, Figure 24, of the Navajo Community Plan (**Figure 3-8, Community Plan Amendment**). The CPA was initiated by the City Planning Commission at their July 19, 2018, meeting.

The CPA also constitutes an amendment to the General Plan. The City's General Plan and Community Plan Amendment Manual states that, "An amendment to the figures or text of a community, specific or precise plan is always an amendment to the General Plan since those plans are components of the Land Use Element of the General Plan." While an amendment is proposed to the Navajo Community Plan, the proposed CPA can be incorporated into the document at the community plan level and scale without need for revisions to the text, maps or other graphics of the General Plan. Therefore, revisions to the General Plan document are not required to implement the project.

3.4.2 Planned Development Permit

A Planned Development Permit (PDP) is required to allow a use that is permitted by the land use plan but not allowed by the underlying zone. In addition, the PDP also permits deviations from the RS-1-7 zone, as described in Table 3-1.

3.4.3 Site Development Permit

A Site Development Permit (SDP) is required for the project to impact sensitive biological resources.

3.4.4 Tentative Map

A Tentative Map (TM) is proposed to facilitate the vacation and granting of easements.

3.4.5 Easement Vacations

Numerous existing easements would be vacated by the TM. Specifically, existing sewer, telecom, and stormwater easements that cross the property would be abandoned. In addition, a portion of the access rights would be revested for the proposed signalized intersection and ingress/egress driveways along College Avenue and ROW would be dedicated to the City to accommodate the proposed parkway along the project frontage with College Avenue.

3.4.6 Other Agency Approvals

No other agency approvals are required to implement the project.

3.5 Intended Uses of the EIR

Pursuant to CEQA Guidelines Section 15124(d), *Project Description*, the description of a project shall contain a statement briefly describing the intended uses of the EIR. The City would use the information in this EIR and supporting documentation in its decision to approve the proposed project.

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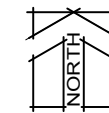
— RETAINING WALL

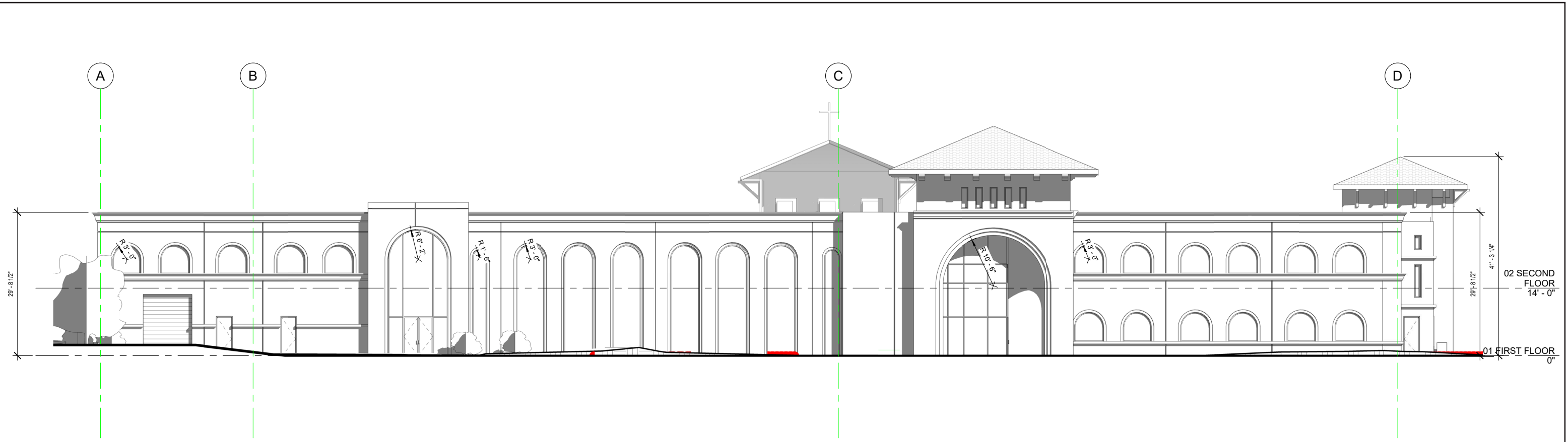
SQUARE FOOTAGE GARAGE	
Name	Area

FIRST LEVEL	35,465 SF
01 PARKING	35,465 SF
FIRST FLOOR	35,465 SF
SECOND LEVEL	35,545 SF
02 PARKING	35,545 SF
SECOND FLOOR	35,545 SF
Grand total	71,010 SF

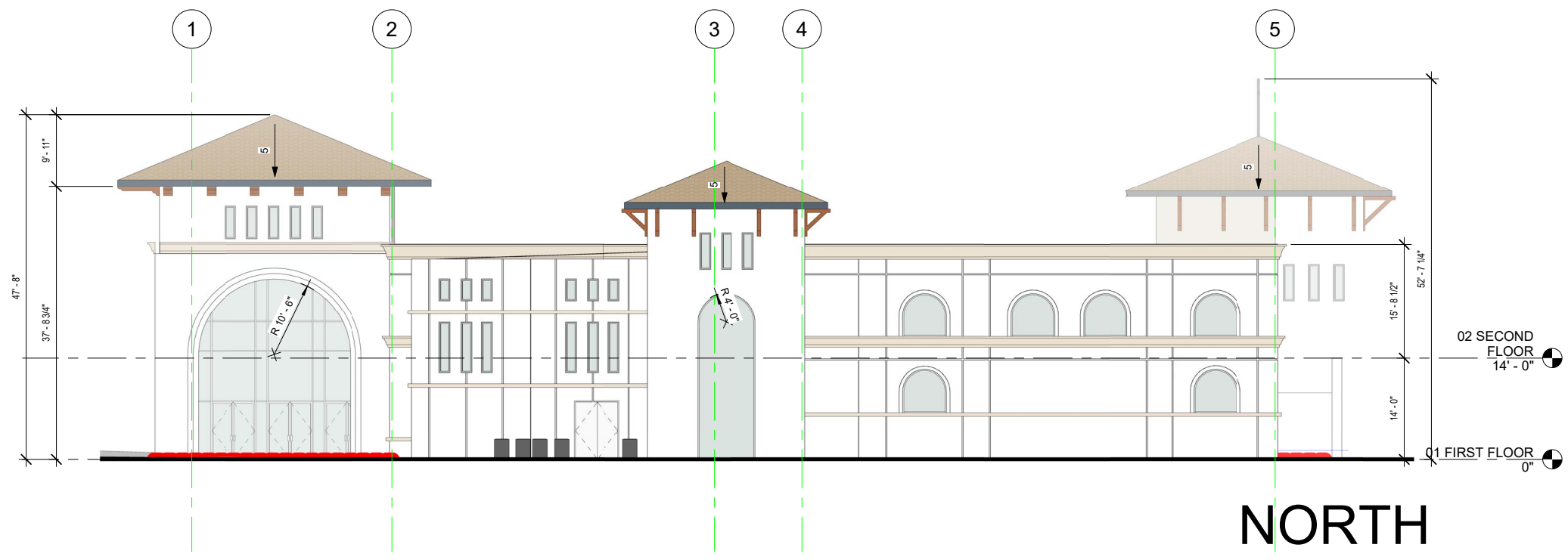
SQUARE FOOTAGE CHURCH	
Name	Area

FIRST FLOOR	36,869 SF
VESTIBULE	526 SF
REAR VESTIBULE	484 SF
01 FIRST FLOOR	37,878 SF
SECOND FLOOR	16,598 SF
02 SECOND FLOOR	16,598 SF
Grand total	54,476 SF





EAST
3/32" = 1'-0"



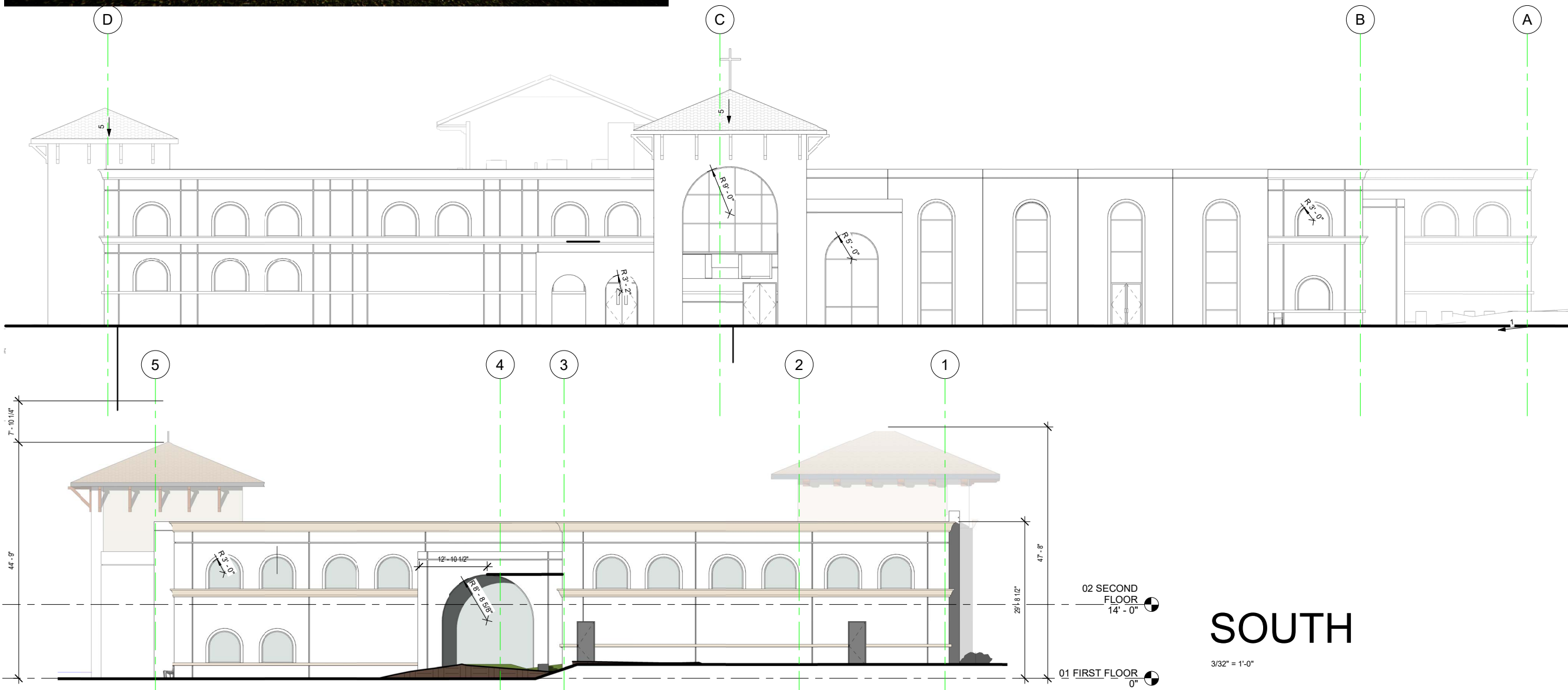
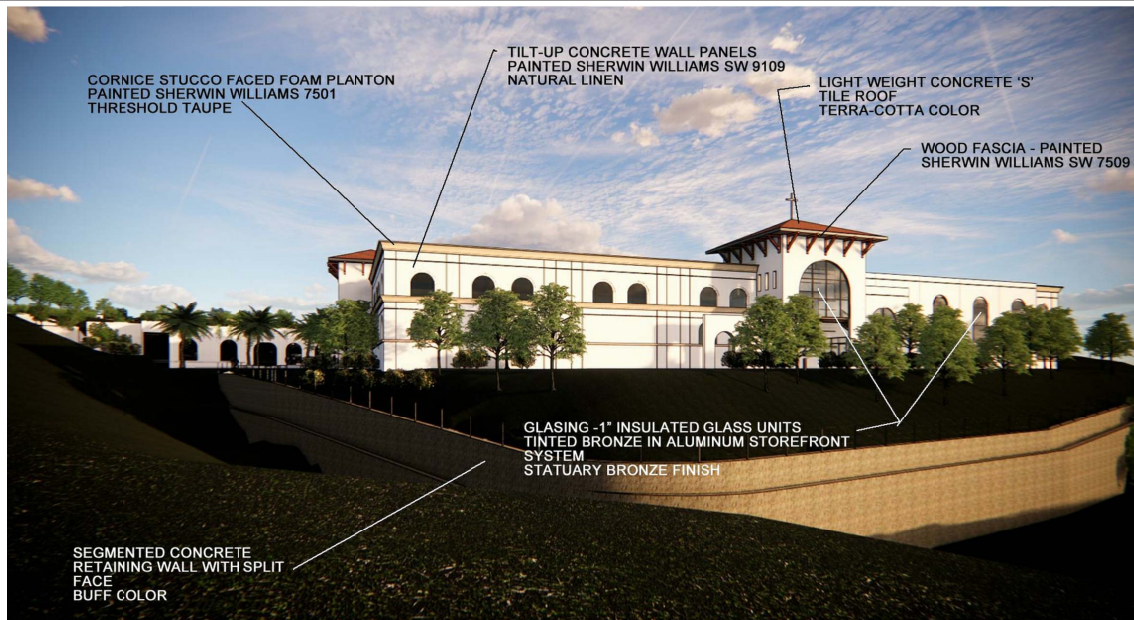
NORTH
3/32" = 1'-0"

Source: Kenneth D. Smith Architect & Associates 2021

Figure 3-2

Exterior Elevations (East and North)

ALL PEOPLES CHURCH

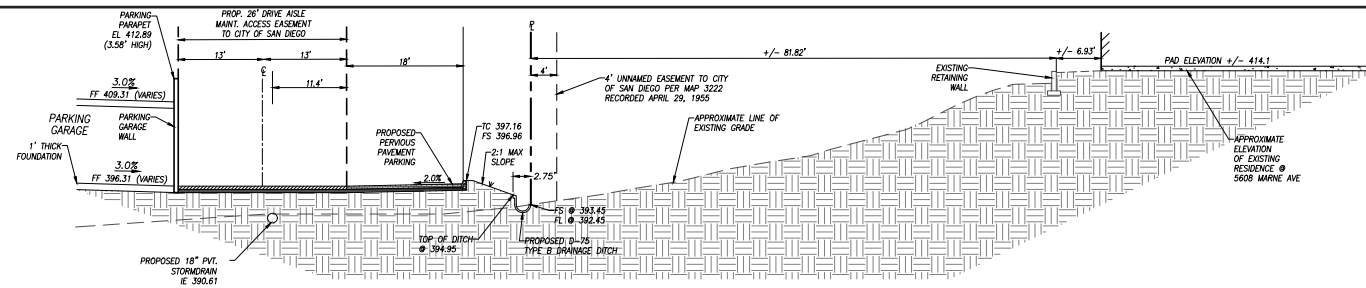


Source: Kenneth D. Smith Architect & Associates 2021

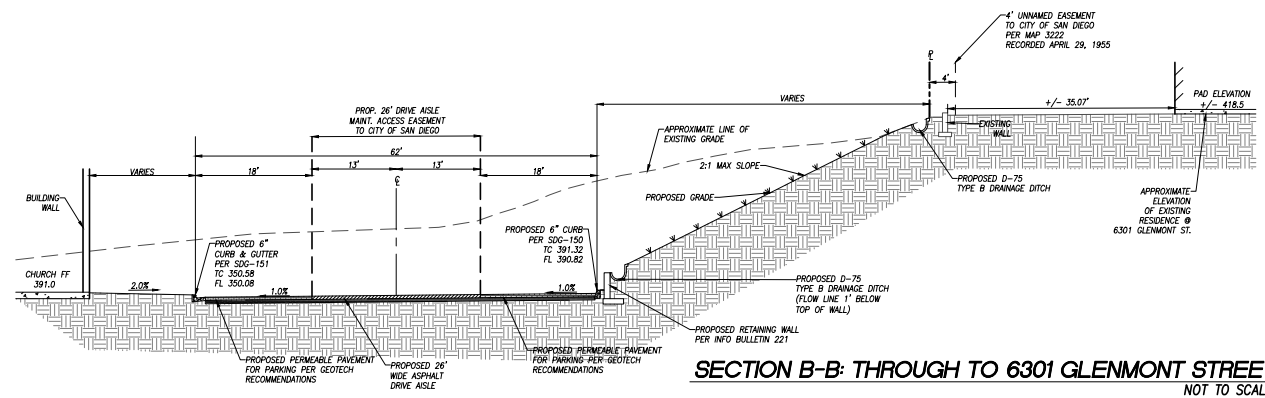
Figure 3-3

Exterior Elevations (West and South)

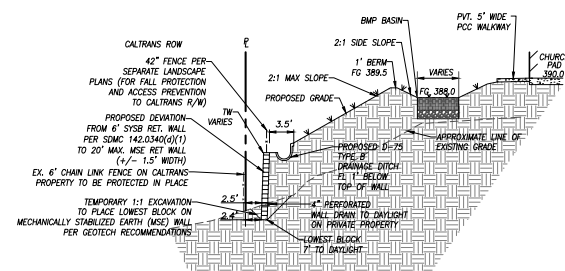
ALL PEOPLES CHURCH



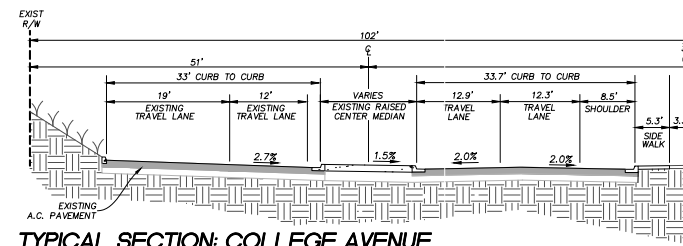
SECTION A-A: THROUGH TO 5608 MARNE AVE
NOT TO SCALE



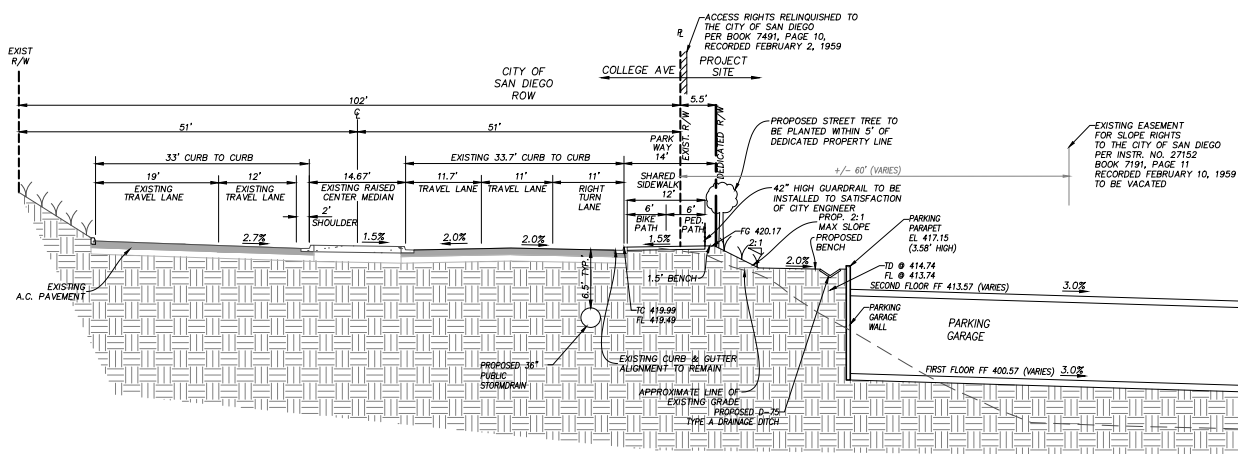
SECTION B-B: THROUGH TO 6301 GLENMONT STREET
NOT TO SCALE



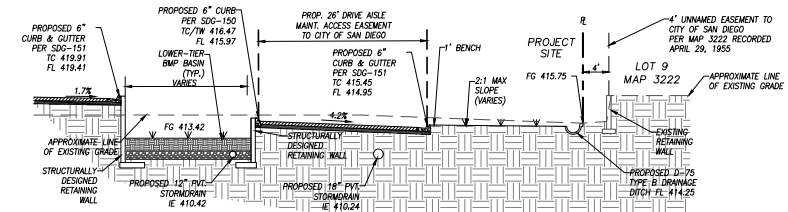
SECTION C-C: SOUTHWEST-CALTRANS ROW
NOT TO SCALE



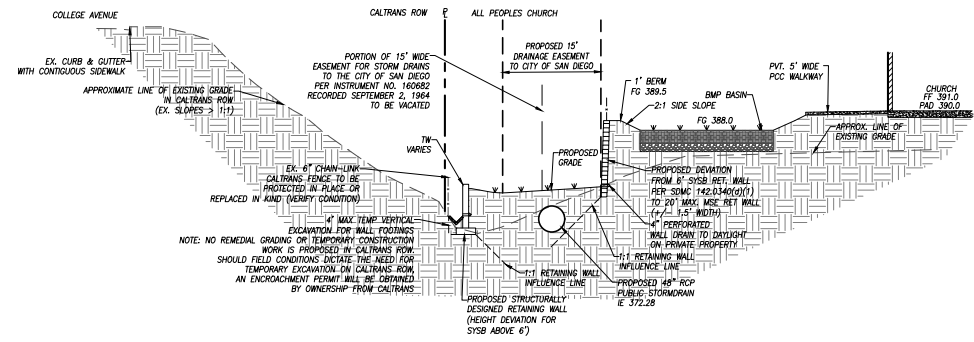
TYPICAL SECTION: COLLEGE AVENUE
NOT TO SCALE



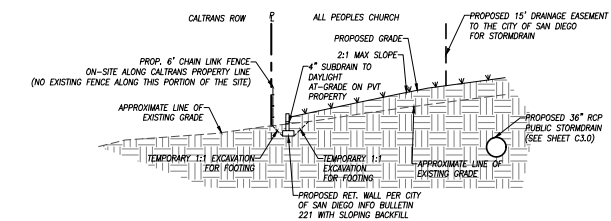
SECTION D-D: WEST FROM COLLEGE AVENUE
NOT TO SCALE



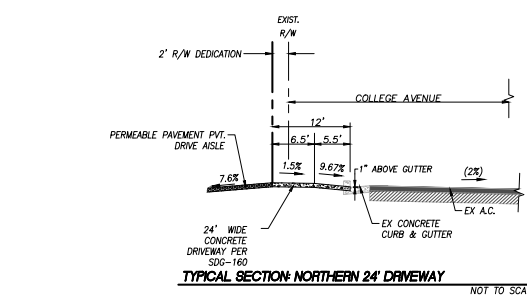
SECTION E-E: EASTERLY BOUNDARY BASIN
NOT TO SCALE



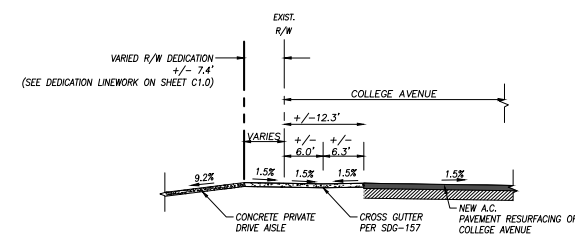
SECTION F-F: CALTRANS ROW THROUGH CHURCH
NOT TO SCALE



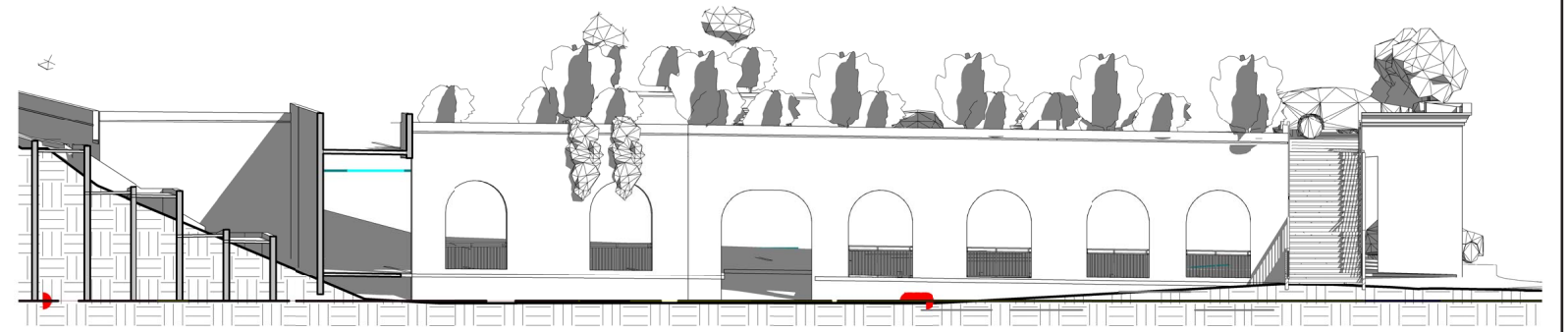
SECTION G-G: CALTRANS ROW
NOT TO SCALE



TYPICAL SECTION: NORTHERN 24' DRIVEWAY
NOT TO SCALE

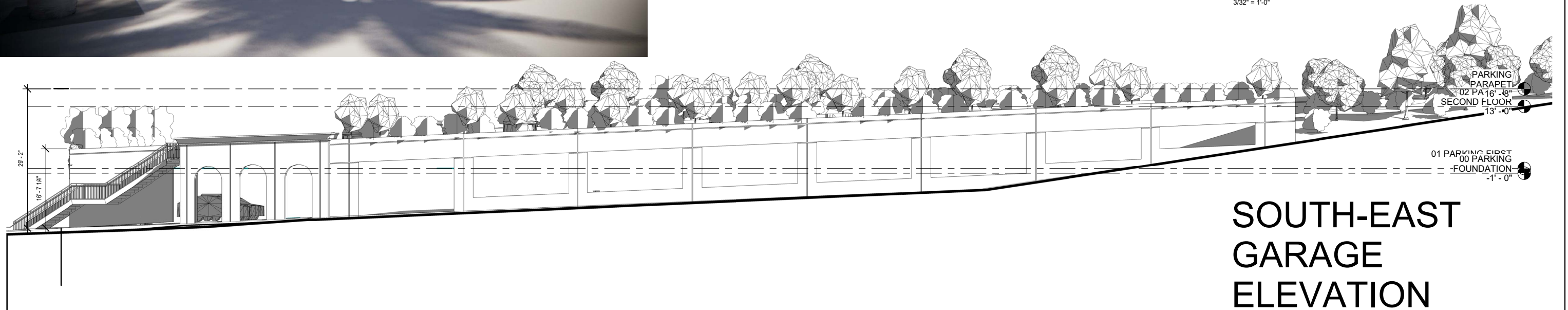


TYPICAL SECTION: 30' SIGNALIZED INTERSECTION
NOT TO SCALE



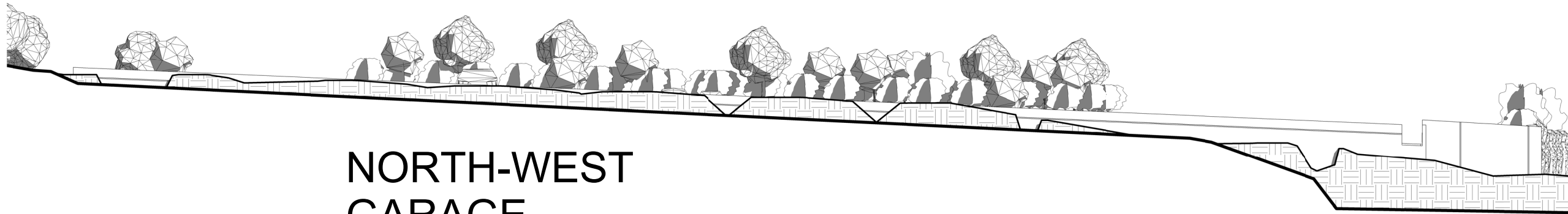
SOUTH-WEST GARAGE ELEVATION

3/32" = 1'-0"



SOUTH-EAST GARAGE ELEVATION

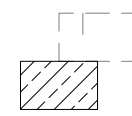
3/32" = 1'-0"



NORTH-WEST GARAGE ELEVATION

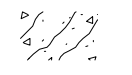
3/32" = 1'-0"

CITY OF SAN DIEGO AREA AND POINT CALCULATIONS



STREET YARD AREA

TOTAL STREET YARD AREA		53,115
REQUIRED LANDSCAPE AREA	25%	13,279
PROVIDED LANDSCAPE AREA		38,716
POINTS		
REQUIRED POINTS	@ .05	2656
REQUIRED TREE POINTS	@ 100%	2656
PROVIDED TREE POINTS		2,810



REMAINING YARD AREA

TOTAL YARD AREA		16,794
REQUIRED LANDSCAPE AREA	30%	5,038
PROVIDED LANDSCAPE AREA		14,881
REQUIRED LANDSCAPE POINTS	@ .05	840
PROVIDED LANDSCAPE POINTS (TREES ONLY)		480
PROVIDED LANDSCAPE POINTS (ALL PLANTS)		1360



STREET TREES- COLLEGE AVENUE

QUANTITY		
REQUIRED	903 FT. @ 1/30	30
PROVIDED		31

COMMERCIAL / RESIDENTIAL ADJACENT BUFFER

QUANTITY		
5 FT BUFFER AREA		6,455
TREE SCREENING POINT REQUIRED	@ .05	323
PROVIDED LANDSCAPE POINTS (TREES ONLY)		360

City of San Diego
Development Services
1727 F St. Ave., 4th Floor
San Diego, CA 92101-4154
(619) 445-0000

Landscape Calculations Worksheet
Vehicular Use Areas (VUA)

Provide the following information on the Landscape Plans. The Landscape Calculations determine the planting area and points required by the Landscape Regulations, Chapter 142, Article 2, Division 4 of the Land Development Code.

One tree (minimum 24 inch box size) is required within 30 ft. of each parking space. (If palm trees are used, one palm (minimum 6 ft. brown trunk height) is required within 15 ft. of each parking space.)

VEHICULAR USE AREA ($\leq 6,000\text{ sq ft}$ [142.0406 - 142.0407])

Planting Area Required: provide 40 sq. ft. per tree (with no dimension less than 5')		
Plant Points Required	Plant Points Provided	Excess Points Provided
Total VUA: _____ sq. ft. x 0.05 = _____ points	_____ points	_____ points
Points achieved through trees (at least half): _____ points		

VEHICULAR USE AREA (>= 6,000 sq ft) [142.0406 - 142.0407]

Required Planting Area	Planting Area Provided	Excess Area Provided
AIA Inside Street Yard: 2,144 sq. ft. x 0.05 = 107 sq. ft.	140 sq. ft.	53 sq. ft.
AIA Outside Street Yard: 11,550 sq. ft. x 0.03 = 3347 sq. ft.	6,155 sq. ft.	3,408 sq. ft.

Required Plant Points	Plant Points Provided	Points Provided with Trees (at least half)
AIA Inside Street Yard: 2,144 sq. ft. x 0.05 = 107 points	-- points	150 points
AIA Outside Street Yard: 11,550 sq. ft. x 0.03 = 3347 points	-- points	4,200 points

TEMPORARY VEHICULAR USE AREA [142.0408]

Required Planting Area	Planting Area Provided
Length of Public Right-of-Way adjacent to VUA: _____ ft. x 3 ft. = _____ sq. ft.	_____ sq. ft.

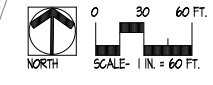
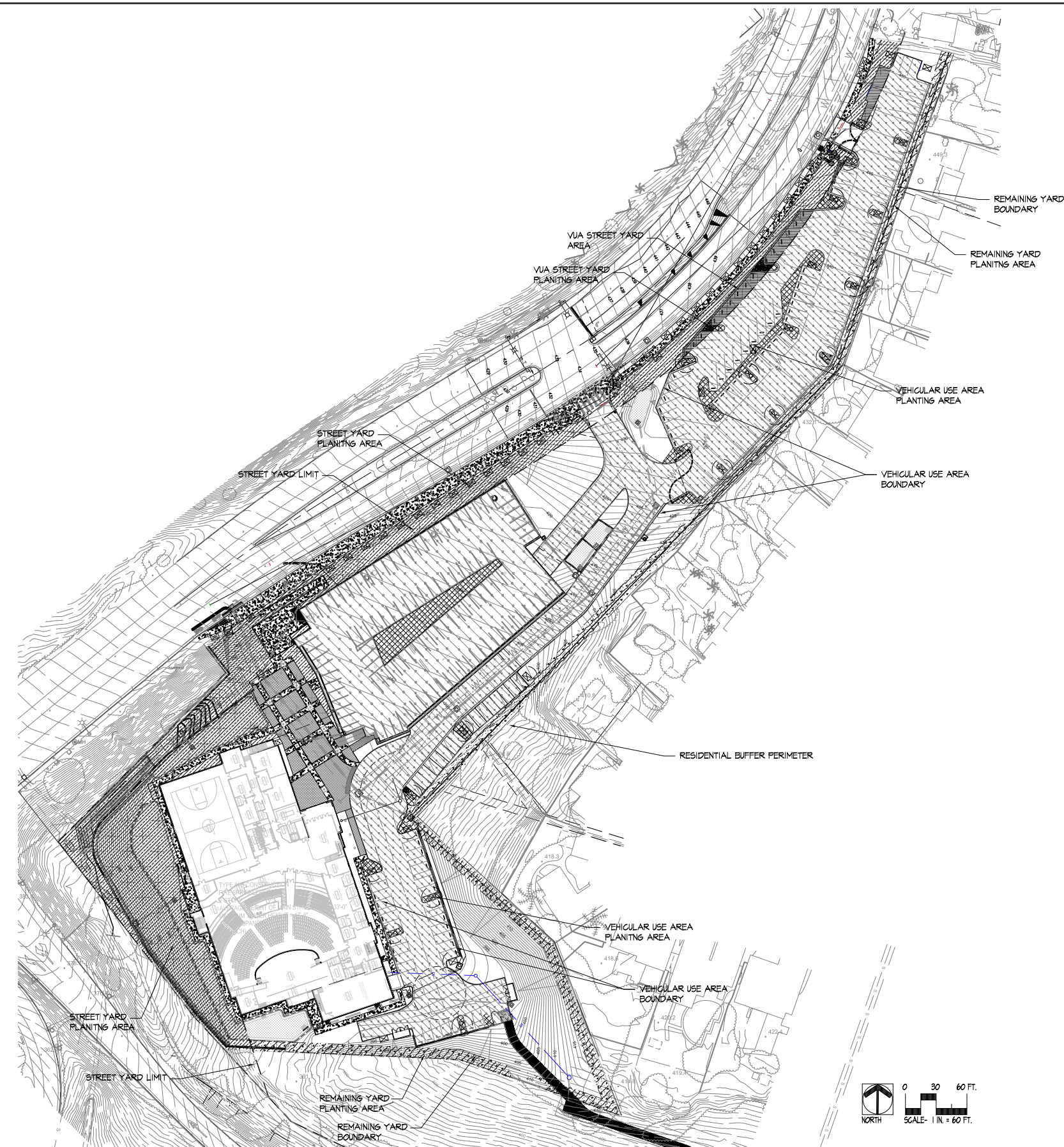
• Provide planting area between Public Right-of-Way and VUA.
• Hard with evergreen shrubs.
• Shrubs must achieve a minimum height of 3' within 2 years of installation over at least 50% of the required planting area.

ADDITIONAL YARD PLANTING AREA AND POINT REQUIREMENTS

If any of the requirements of Landscape Regulations, Section 142.0405 (g) 1, 2, or 3 apply to your project, provide a written summary explaining how requirements are being met.

Printed on recycled paper. Visit our web site at www.sandiego.gov/development-services.
Upon request, this information is available in alternative formats for persons with disabilities.
DS-5 (03-06)

ROOT ZONE NOTE:
AT THE UPPER PARKING LEVEL OF PARKING STRUCTURE- THE MINIMUM DIMENSION AND ROOT ZONE AREA MAY BE REDUCED WITH THE USE OF STRUCTURAL SOIL OR WHERE THE COMBINATION OF SOIL CONDITIONS, ROOT ZONE AREA, ADJACENT IMPROVEMENTS, AND SELECTED TREE SPECIES CAN BE DEMONSTRATED TO PROVIDE CONDITIONS FOR HEALTHY TREE GROWTH THAT WILL NOT DAMAGE ADJACENT IMPROVEMENTS.



Source: Ahles Landscape Architecture 2022

Figure 3-6
Landscape Plan
ALL PEOPLES CHURCH

TOPOGRAPHY:

SURVEY NOTES:

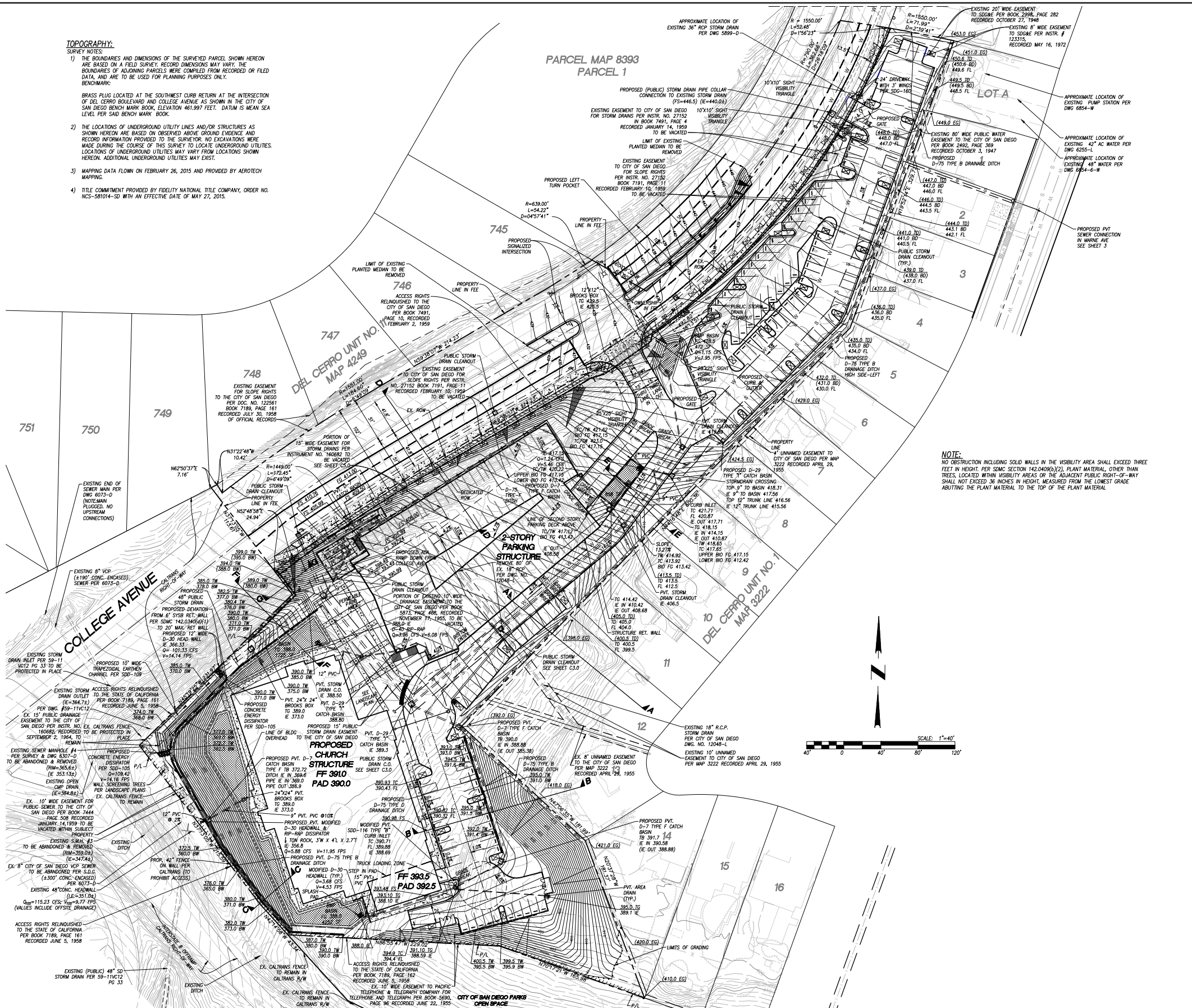
1) THE BOUNDARIES AND DIMENSIONS OF THE SURVEYED PARCEL SHOWN HEREON ARE BASED ON A FIELD SURVEY. RECORD DIMENSIONS MAY VARY. THE BOUNDARIES OF ADJOINING PARCELS WERE COMPILED FROM RECORDED OR FILED DATA, AND ARE TO BE USED FOR PLANNING PURPOSES ONLY. BENCHMARK:

BRASS PLUG LOCATED AT THE SOUTHWEST CURB RETURN AT THE INTERSECTION OF DEL CERRO BOULEVARD AND COLLEGE AVENUE AS SHOWN IN THE CITY OF SAN DIEGO BENCH MARK BOOK, ELEVATION 461.997 FEET. DATUM IS MEAN SEA LEVEL PER SAID BENCH MARK BOOK.

2) THE LOCATIONS OF UNDERGROUND UTILITY LINES AND/OR STRUCTURES AS SHOWN HEREON ARE BASED ON OBSERVED ABOVE GROUND EVIDENCE AND RECORD INFORMATION PROVIDED TO THE SURVEYOR. NO EXCAVATIONS WERE MADE DURING THE COURSE OF THIS SURVEY TO LOCATE UNDERGROUND UTILITIES. LOCATIONS OF UNDERGROUND UTILITIES MAY VARY FROM LOCATIONS SHOWN HEREON. ADDITIONAL UNDERGROUND UTILITIES MAY EXIST.

3) MAPPING DATA FLOWN ON FEBRUARY 26, 2015 AND PROVIDED BY AEROTECH MAPPING.

4) TITLE COMMITMENT PROVIDED BY FIDELITY NATIONAL TITLE COMPANY, ORDER NO. NCS-581014-SD WITH AN EFFECTIVE DATE OF MAY 27, 2015.



LEGEND

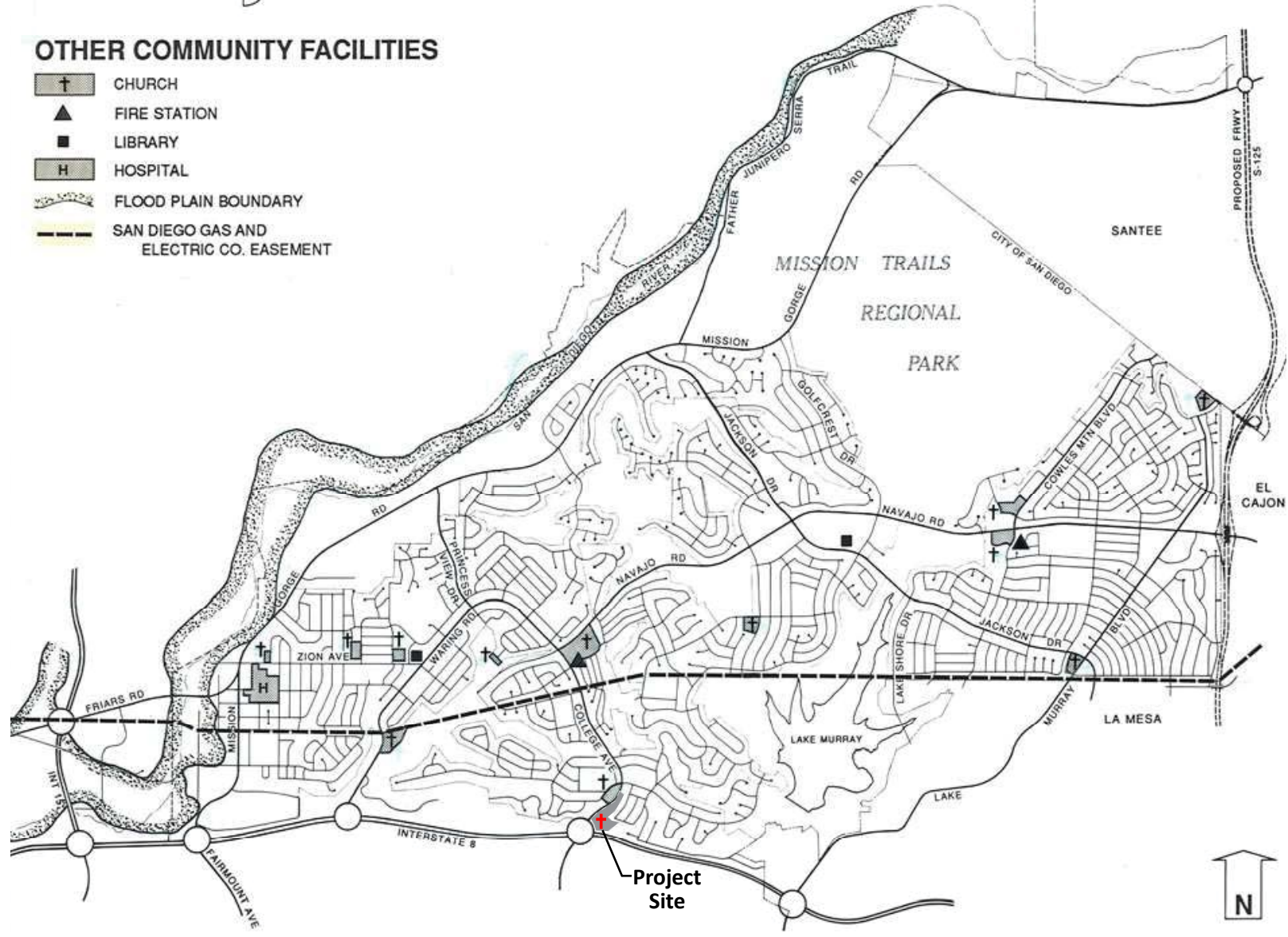
- BOUNDARY LINE
- ADJACENT PROPERTY LINE
- EASEMENT LINE
- RIGHT OF WAY
- EXISTING STREET CENTERLINE
- EXISTING IMPROVEMENTS
- EXISTING CONTOUR
- EXISTING CURB & GUTTER
- EXISTING SEWER MAIN
- EXISTING STORM DRAIN MAIN
- EXISTING CURB INLET
- EXISTING WATER MAIN
- EXISTING WATER VALVE
- EXISTING FIRE HYDRANT
- EXISTING STREET LIGHT
- EXISTING STRUCTURE
- EXISTING VEGETATION
- PROPOSED IMPROVEMENTS
- PROPOSED ROAD CENTERLINE
- LIMIT OF WORK LINE
- CURB AND GUTTER
- 24' RESIDENTIAL DRIVEWAY
- PROPOSED CONTOURS
- PROPOSED SPOT ELEVATION
- RETAINING WALL
- SORSED D-75 BROW DITCH
- BIORETENTION BASIN
- STORM DRAIN HEADWALL
- STORM DRAIN CLEANOUT
- AREA DRAIN
- STORM DRAIN INLET
- TYPE F CATCH BASIN
- RIP RAP ENERGY DISSIPATOR PER SDD-104
- PVC STORM DRAIN (SIZE VARIES)
- WATER SERVICE
- TRAFFIC SIGNAL
- PARKING GARAGE WALL
- CUT/FILL SLOPE
- PERMEABLE PAVERS
- PROPOSED RIP-RAP
- TREE PER LANDSCAPE PLANS

NOTE:
NO OBSTRUCTION INCLUDING SOLID WALLS IN THE VISIBILITY AREA SHALL EXCEED THREE FEET IN HEIGHT. PER SDMC SECTION 142.0409(b)(2), PLANT MATERIAL, OTHER THAN TREES, LOCATED WITHIN VISIBILITY AREAS OF THE ADJACENT PUBLIC RIGHT-OF-WAY SHALL NOT EXCEED 36 INCHES IN HEIGHT, MEASURED FROM THE LOWEST GRADE ABUTTING THE PLANT MATERIAL TO THE TOP OF THE PLANT MATERIAL.

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OTHER COMMUNITY FACILITIES

-  CHURCH
-  FIRE STATION
-  LIBRARY
-  HOSPITAL
-  FLOOD PLAIN BOUNDARY
-  SAN DIEGO GAS AND ELECTRIC CO. EASEMENT



source: City of San Diego Planning Department, Navajo Community Plan 2015

Figure 3-8

Community Plan Amendment

ALL PEOPLES CHURCH

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4. HISTORY OF PROJECT CHANGES

This section chronicles changes that have been made to the project in response to environmental concerns raised during the City's review of the project. Since submittal of the application to the City Development Services Department, the project design has been revised as noted below in response to staff comments and is described as such in Chapter 3, *Project Description*:

- The majority of the church structure was lowered from 33 feet above finished grade to 30 feet above finished grade, with the exception of the three locations that would feature elevated architectural tower elements up to 45 to 48 feet above and the accompanying cross on the west elevation which would extend to 53 feet above the finished pad elevation.
- Hanging vines, shade trees, and planter boxes were added to the rooftop of the parking structure to shade its surface and soften its appearance.
- Architectural treatments (i.e., arched entries) similar to those on the church structure were added to the parking garage to enhance its aesthetic appearance.
- Landscape buffer screening consisting of large canopy shade trees was added along the common property line between the project improvements and off-site residential properties to the east.
- Existing slopes along College Avenue that are constructed at a slope ratio of 1.5:1 were graded down to a slope ratio of 2:1 for stability.
- To avoid grading into the California Transportation Department (Caltrans) Interstate 8 (I-8) easement as requested by Caltrans staff, retaining walls were placed along the southern edge of the property (see Appendix A for details).
- Landscape treatments were added above and below the retaining walls facing I-8 and College Avenue to screen and soften their appearance from offsite public vantage points.
- A 12-foot shared bicycle/pedestrian facility was added along College Avenue to facilitate non-motorized travel.
- Street trees were placed between the road and the non-contiguous sidewalk along College Avenue from project's southern boundary to the proposed signalized driveway to create a parkway and further screen the proposed parking areas north of the southern driveway.
- A gate was added to the northern driveway to prevent parking lot access during facility closures in response to community safety concerns.
- The off-site gravity sewer line connection was realigned from a southerly location through the adjacent fee-owned City parkland and beneath I-8. Instead, the proposed sewer force main would extend northerly parallel to and crossing through the eastern property line via a proposed private easement within a residential lot along Marne Avenue to a nearby sewer service connection within that road.

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5. ENVIRONMENTAL ANALYSIS

5.1 Land Use

This section discusses applicable land uses, plans and policies and the All Peoples Church Project's (project) compliance with those plans and policies. The discussion relies on planning and environmental information contained in other sections of this Environmental Impact Report (EIR), as applicable.

5.1.1 Existing Conditions

The approximately 6-acre project site consists of one parcel (Assessor's Parcel Number [APN] 463-010-10-00) at the northeast corner of Interstate 8 (I-8) and College Avenue interchange. The site is located in the southern portion of the Del Cerro neighborhood of the Navajo Community Plan area in the City of San Diego (City) (refer to Figure 2-4). The project site is within the RS-1-7 zone (refer to Figure 2-3 in Chapter 2, *Environmental Setting*), which is intended to accommodate single-family residential uses. The RS-1-7 development regulations permit a minimum lot area of 5,000 square feet (SF) and a maximum residential density of one dwelling unit (DU) for each 5,000 SF lot. The existing site is vacant and consists largely of a historically modified landscape with no naturally occurring steep slopes, that contains, native, non-native, disturbed habitat, and ornamental landscaping, as described in Chapter 2, *Environmental Setting*.

The project site is bounded by College Avenue on the west, the California Department of Transportation (Caltrans) right-of-way (ROW) including westbound I-8 off-ramp at College Avenue, and City of San Diego (City) Park and Recreation- owned dedicated parkland to the south, single-family homes along Marne Avenue and the western end of Glenmont Street to the east, and commercial properties to the north fronting Del Cerro Boulevard. Regionally, the project site can be accessed from I-8 via the College Avenue interchange, while local access to the site is provided by College Avenue south of Del Cerro Boulevard. The Caltrans ROW for the I-8 interchange occurs along the southern property line of the project site.

The broader surrounding area consists of housing, neighborhood-serving commercial uses, institutional uses, and parks. North and east of the project site are single-family homes, neighborhood commercial, and multi-family apartments. South of the project site is I-8, beyond which is the San Diego State University (SDSU) campus. West of the project site are single-family homes, Hearst Elementary, and a religious institution (Temple Emanu-El). The nearby neighborhood commercial along Del Cerro Boulevard offers a grocery store (Windmill Farms), Chevron gas station, medical offices, dine-in restaurants and fast-food eating establishments, and shopping services for the surrounding residents. Metropolitan Transit Service (MTS) Bus Routes 14 and 115 run along the site's western boundary and provide service to the SDSU Transit Center located at College Avenue and Hardy Avenue.

5.1.2 Regulatory Framework

The following discussion briefly describes land use plans, ordinances, and regulations that apply to the project, including the City's General Plan, Navajo Community Plan, Land Development Code

(LDC), Multiple Species Conservation Program (MSCP) Subarea Plan, Planned Development Permit (PDP) regulations (LDC Section 126.0601), Site Development Permit (SDP) regulations (LDC Section 126.0501) and Montgomery Field Airport Land Use Compatibility Plan (ALUCP).

5.1.2.1 Montgomery Field Airport Land Use Compatibility Plan

The Airport Land Use Commission (ALUC) is an agency that is required by state law to exist in counties in which there is a commercial and/or a general aviation airport. The purpose of the ALUCP is to protect public health, safety, and welfare by ensuring the orderly development of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports, to the extent that these areas are not already devoted to incompatible uses. The San Diego County Regional Airport Authority (SDCRAA) serves as the ALUC for Montgomery Field.

The Montgomery Field LUCP established the Airport Influence Area (AIA) for this airport. Essentially, the ALUCP serves as a tool for use by the SDCRAA in fulfilling its duty to review land use development proposals within the AIA at Montgomery Field. In addition, the ALUCP provides compatibility policies and criteria applicable to local agencies in their preparation or amendment of land use plans and ordinances and to landowners in their design of new development. The most recent version of the Montgomery Field ALUCP was amended in December 2010 (SDCRAA 2010). The project site is located within the AIA for the airport, whose airfield is approximately 7 miles to northwest.

5.1.2.2 City of San Diego General Plan

The City approved its General Plan on March 10, 2008, after a comprehensive update. The General Plan is a comprehensive, long-term document that sets out a long-range vision and policy framework for how the City could grow and develop, provide public services, and maintain the qualities that define San Diego. Accordingly, the General Plan "provides policy guidance to balance the needs of a growing city while enhancing quality of life for current and future San Diegans" (City of San Diego 2008a). The General Plan is comprised of a Strategic Framework section and ten elements, many of which have been subsequently amended since their original adoption, including: Land Use and Community Planning (City of San Diego 2015b); Mobility (City of San Diego 2015c); Urban Design; Economic Prosperity (City of San Diego 2015d); Public Facilities, Services, and Safety (City of San Diego 2021a); Recreation (City of San Diego 2021b); Conservation; Historic Preservation; Noise (City of San Diego 2015e); and Housing (City of San Diego 2020a). The following discussion summarizes each element that is relevant and applicable to the project. For those that are not relevant, no further discussion is provided. In addition, applicable goals and policies within each element pertaining to the project are evaluated in detail as presented at the end of this section in **Table 5.1-1, City of San Diego General Plan Land Use Goals, Objectives, and Policies Consistency Evaluation.**

Strategic Framework

The Strategic Framework section provides an overarching strategy for how the city will grow while maintaining the qualities that best define San Diego. The General Plan and Strategic Framework incorporate the City of Villages strategy that focuses growth into compact, mixed-use, walkable centers linked to an improved regional transit system. A "village" is defined as the mixed-use

community or neighborhood center where residential, commercial, employment, and civic uses are integrated by pedestrian-friendly design characterized by inviting, accessible, and attractive building frontages, streets, and public spaces. This compact urban form reduces the need to travel and makes alternative modes of transportation easier to use. This is the first growth strategy in the City's history that focuses on infill development and allows limited expansion onto the City's remaining open spaces. The strategy's smart growth principles promote mixed-use development areas and focus development in areas that already contain the necessary infrastructure to support such development. There are no specific policies from the framework that are applicable to the project.

Land Use and Community Planning Element

The purpose of the Land Use and Community Planning Element (Land Use Element) is "to guide future growth and development into a sustainable citywide development pattern, while maintaining or enhancing quality of life in our communities" (City of San Diego 2015b). The Land Use Element addresses land use issues that apply to the City as a whole and identifies the community planning program as the mechanism to designate land uses, identify site-specific recommendations, and refine citywide policies, as needed. The Land Use Element establishes a structure that respects the diversity of each community and includes policies that govern the preparation of community plans. The Land Use Element addresses zoning and policy consistency, the plan amendment process, airport-land use planning, annexation policies, balanced communities, equitable development, and environmental justice. The project site is designated as "Residential" on Figure LU-2, General Plan Land Use and Street System, in the General Plan (refer to Figure 2-6 of this EIR).

The Land Use Element contains three goals related to amending community plans, which are applicable to the project since a Community Plan Amendment (CPA) is required:

- Approve plan amendments that better implement the General Plan and community plan goals and policies.
- Clearly define the process for amendments to community plans.
- Allow for changes that will assist in enhancing and implementing the community's vision.

Community plans are important because they contain detailed land use designations and site-specific policy recommendations than is possible at the citywide level including specific policies intended to respect essential community character. Future public and private projects are evaluated for consistency with land uses, goals and policies in the community plans. The specific policies in the Land Use and Community Planning Element that apply to project are contained in Table 5.1-1.

Mobility Element

The purpose of the Mobility Element is "to improve mobility through development of a balanced, multi-modal transportation network" (City of San Diego 2008a). The element identifies the proposed transportation network and strategies needed to support the anticipated General Plan land uses.

The Mobility Element's policies promote a balanced, multimodal transportation network to make walking, bicycling, and transit use more safe, attractive, and efficient forms of transportation, while addressing the needs of drivers. The Mobility Element contains policies that address multimodal transportation, parking, the movement of goods and services, and other components of a

transportation system while balancing the goals of protecting neighborhood characters and environmental resources. Together, these policies advance a strategy for relieving congestion and increasing transportation choices. Applicable policies from the element are contained in Table 5.1-1.

Urban Design Element

The purpose of the Urban Design Element is “to guide physical development toward a desired image that is consistent with the social, economic and aesthetic values of the city” (City of San Diego 2008a). The Urban Design Element policies capitalize on San Diego’s natural beauty and unique neighborhoods by calling for development that respects the natural setting, enhances the distinctiveness of its neighborhoods, strengthens the natural and built linkages, and creates mixed-use, walkable villages throughout the city. Urban Design Element policies help support and implement land use and transportation decisions, encourage economic revitalization, and improve the quality of life in San Diego. Ultimately, the Urban Design Element influences the implementation of all of the General Plan’s elements and community plans. It sets goals and policies for the pattern and scale of development as well as the character of the built environment. Urban Design Element policies that pertain to local development within the project area are contained in Table 5.1-1.

Public Facilities, Services, and Safety Element

The purpose of the Public Facilities, Services, and Safety Element (Public Facilities Element) is “to provide the public facilities and services needed to serve the existing population and new growth” (City 2021a). This element is directed at providing adequate public facilities and services through policies that address public financing strategies, public and developer financing responsibilities, prioritization, and the provision of specific facilities and services that must accompany growth. The policies within this element also apply to a wide range of public facilities and services including transportation, recreation, fire-rescue, police, wastewater collection and treatment, stormwater infrastructure, water supply and distribution, waste management, libraries, schools, public utilities, disaster preparedness and seismic safety.

Conservation Element

The purpose of the Conservation Element is for the city “to become an international model of sustainable development and conservation and to provide for the long-term conservation and sustainable management of the rich and natural resources that help define the City’s identity, contribute to its economy, and improve its quality of life.” This element contains policies to guide the conservation of the resources that are fundamental components of San Diego’s environment. Resources considered in the Conservation Element that are applicable to the project include water, land, air, biodiversity, recyclables, topography, views, and energy. Sustainable conservation practices are outlined in the policies, include those related to climate change. Specific City-wide policies with a conservation focus are also contained in the Land Use, Mobility, and Urban Design Elements of the General Plan, as well as the Conservation Element itself. The Conservation Element includes a reference to the City’s Climate Action Plan (CAP) (see separate discussion).

Noise Element

The Noise Element provides goals and policies to guide compatible land uses, and the incorporation of noise attenuation measures for new uses to protect people living and working in the City from

exposure to excessive noise. To evaluate noise compatibility, the Noise Element establishes noise compatibility guidelines for specific land uses (refer to Table 5.4-3 in Section 5.4, *Noise*, for the land use-noise compatibility table).

5.1.2.3 Climate Action Plan

The City adopted its CAP in December 2015 to outline the actions to be taken by the City to achieve its proportional share of state greenhouse gas (GHG) emission reductions consistent with California Air Resources Board requirements. The CAP serves as mitigation for the CEQA GHG/climate change impacts of the City's 2008 General Plan (City of San Diego 2015a). The General Plan calls for the City to reduce its carbon footprint through actions including adopting new or amended regulations, programs, and incentives. General Plan Policy CE-A.13 specifically identifies the need for an update of the City's 2005 Climate Protection Action Plan that identifies actions and programs to reduce the GHG emissions of the community-at-large, and City operations. Additionally, the CAP serves as a "Qualified GHG Reduction Plan" for purposes of tiering under CEQA. The CAP quantifies baseline GHG emissions for 2010; provides emissions forecasts for 2020 and 2035; establishes reduction targets for 2020 and 2035; identifies strategies and measures to reduce GHG levels; and provides guidance for monitoring progress on an annual basis. Implementation of the CAP relies on compliance with various policies within the General Plan and consistency with the underlying land use assumptions in the CAP.

The City initially adopted its CAP Consistency Checklist in July 2016; the form was revised in July 2017 (see Appendix B to this EIR). The CAP Consistency Checklist is part of the CAP and contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved. As required by the CAP, the project proposes sustainable design features to minimize use of water, energy, and solid waste as outlined in Chapter 3, *Project Description*. Implementation of the measures would ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies designed to achieve the identified GHG reduction targets.

In August 2022, the City Council approved an update to the CAP to expand its approach and strategies for achieving the goal of net zero emissions by 2035 (City of San Diego 2022). As such, the 2022 CAP establishes a new goal, targets and actions that go beyond the 2015 CAP goal. The five strategies include: decarbonization of the built environment; access to clean and renewable energy; mobility and land use; circular economy and clean communities; resilient infrastructure and healthy ecosystems; and emerging climate actions. An implementation plan for the 2022 CAP is being developed by the City's Sustainability and Mobility Department to provide guidance on how to implement the new CAP strategies and measures; the implementation plan will be finalized within six to nine months of CAP adoption.

5.1.2.4 Navajo Community Plan

The project site is governed by the Navajo Community Plan (Community Plan), which was adopted by the San Diego City Council in 1982. Several amendments have occurred since its adoption, with the most recent amendment occurring in 2015. The Navajo area of San Diego is approximately 8,000 acres in size and is located in the easterly portion of the city. It includes the community areas of Allied Gardens, Del Cerro, Grantville and San Carlos. It is bounded on the north by Mission Gorge, on

the east by the cities of El Cajon and La Mesa, on the south by I-8 and on the west by the San Diego River channel. The overriding objectives for the long-range development of Navajo are to retain the residential character of the area, provide adequate community services, such as police and fire protection, rubbish collection, etc., establish guidelines for the utilization of canyons and hillsides and enhance the environment of the area as a pleasant community in which to live (City of San Diego 2010). Public and semi-public uses and single-family homes are the predominant land uses within the community.

In general, the Navajo Community is comprised of several distinctive neighborhoods and disparate areas due to the division of the community by various landforms and open spaces. To the west is Grantville, which is lower in elevation and features higher intensity residential and commercial uses, to the north are the open spaces associated with Mission Gorge and Mission Trails Regional Park, while in the center and east side of the community are San Carlos and Del Cerro, which feature residential neighborhoods interspersed with local commercial and institutional uses (i.e., religious assembly facilities). This project site is on the southern edge of the Community Plan area and interfaces directly with I-8, the College Community Plan Area and the SDSU campus across the freeway from the project area.

The Community Plan is intended to supplement General Plan policies by identifying specific community issues and policies that build on those already embodied in the General Plan. A community plan also provides more detailed land uses and describes the distribution of land uses better than is possible at the citywide level. Their community-specific detail is also used in review of both public and private development projects and informs the issue of development intensity.

The Navajo Community Plan identifies a “vision” for the future development of the Navajo community and contains policies that implement that vision. It also contains implementation strategies that establish the time and financing required to implement the policies of that vision. Elements are presented in terms of existing conditions, development potential or projected needs, objectives and proposals. A Community Plan land use map presents a composite of all major land use proposals.

The Community Plan discusses the community environment and major land uses: residential, commercial, open space, industrial, community facilities, and circulation. Elements are presented in terms of existing conditions, development potential or projected needs, objectives and proposals. With the exception of commercial and industrial elements, the goals and recommendations of the remaining elements relevant to the project are presented in Table 5.1-2, *Navajo Community Plan Goals and Recommendations Consistency Evaluation*, later in this section.

As presented in Chapter 2, *Environmental Setting*, the project site is identified as “Single Family” residential by the Navajo Community Plan land use map (Figure 4; also refer to Figure 2-4 of the EIR). The site is more specifically designated as Very Low/Low Density Residential use at a density range between 0 to 9 dwelling units per acre in the Community Plan’s Residential Element. The Community Plan also identifies community serving and public uses on the land use map and identifies community facilities such as schools, churches, fire stations, libraries and hospitals separately by patterns and individual symbols within Figures 23 and 24.

5.1.2.5 Land Development Code

San Diego Municipal Code (SDMC) Chapters 11 through 15 are referred to as the LDC, as they contain the City's land development regulations that dictate how land is to be developed and used within the City. The LDC contains citywide base zones, and the planned district ordinances that specify permitted land use; development standards such as density, floor area ratio, and other requirements for given zoning classifications; overlay zones; and other supplemental regulations that provide additional development requirements. The existing zoning of the project site is RS-1-7.

Development within the project area is subject to the development regulations of the LDC, including the Environmentally Sensitive Lands (ESL) regulations (LDC Sections 143.0101 through 143.0160), PDP regulations (LDC Section 126.0601), and SDP regulations (LDC Section 126.0501).

LDC Chapter 14 includes the general development regulations, supplemental development regulations, building regulations, and electrical/plumbing/mechanical regulations that govern all aspects of project development. The grading, landscaping, parking, signage, fencing, and storage requirements are all contained within the Chapter 14, *General Regulations*. Also included within Chapter 14 are the ESL Regulations, discussed below.

Planned Development Permit Regulations

The purpose of a PDP is to allow an applicant to request greater flexibility from the strict application of base zoning regulations than would normally be allowed. As stated in LDC Section 126.0601, "the intent is to encourage imaginative and innovative planning and to assure that the development achieves the purpose and intent of the applicable land use plan and that it would be preferable to what would be achieved by strict conformance with the regulations." Development that does not comply with the permitted uses in the base zone, or the development regulations of that zone, or proposes limited deviations from the applicable development regulations may apply for a PDP. In the case of the project, the PDP Regulations pertain to the four deviations from the development regulations of the RS-1-7 zone, as well as the proposed use, as described in Chapter 3, *Project Description*. Pursuant to San Diego Municipal Code (SDMC) Section 126.0602(a)(2), a PDP allows for a use that "complies with the applicable land use plan, but contains uses that are not permitted in the underlying base zone."

Site Development Permit Regulations

The purpose of a SDP is to establish a review process for proposed development that, because of its site, location, size, or some other characteristic, may have significant impacts on resources or on the surrounding area, even if developed in conformance with all regulations. As stated in LDC Section 126.0501, the intent of these procedures is to apply site-specific conditions as necessary to assure that the development does not adversely affect the applicable land use plan and to help ensure that all regulations are met. An SDP is required for the project because of impacts to ESL (i.e., sensitive habitat) located on site.

Environmentally Sensitive Lands Regulations

The purpose of the ESL Regulations (LDC Sections 143.0101 through 143.0160) is to protect, preserve and, where damaged, restore ESL and the viability of the species supported by those lands.

The ESL Regulations apply to all proposed development when ESL, including sensitive biological resources, steep hillsides, floodplains, or coastal bluffs, are present. The regulations are designed to ensure that development occurs in a manner that protects natural resources and the natural and topographic character of the area, and retains biodiversity and interconnected habitats. The ESL Regulations contain development regulations that are applied through an SDP in accordance with LDC Section 125.0502 when there is a potential for impacts to environmentally sensitive resources. It is intended for these regulations and accompanying guidelines to serve as standards for determination of impacts and mitigation under CEQA and also serve to implement the MSCP. Within the project area, ESL resources are limited to sensitive habitats.

5.1.3 Impact 1: Potential Conflicts with General or Community Plans

Issue 1: Would the project result in an inconsistency/conflict with the environmental goals, objectives, or recommendations of the General Plan or Community Plan in which it is located?

Issue 2: Would the project require a deviation or variance, and would the deviation or variance in turn result in a physical impact on the environment?

5.1.3.1 Impact Thresholds

According to the City's Significance Determination Thresholds (2020), land use policy impacts may be significant if the project would be:

- Inconsistent or conflict with the environmental goals, objectives, or guidelines of a community or General Plan;
- Inconsistent or conflict with an adopted land use designation or intensity and result in indirect or secondary environmental impacts; and/or
- Substantially incompatible with an adopted plan.

An inconsistency with a plan is not by itself a significant environmental impact. For an inconsistency to have an impact; the inconsistency must relate to an environmental issue (i.e., cause a direct or indirect physical change to the environment) to be considered significant under the California Environmental Quality Act (CEQA).

5.1.3.2 Impact Analysis

This section addresses adopted plans with environmental goals, objectives, and/or guidelines used to make land use decisions in the city that are relevant to the project. The project includes a CPA that would address any land use consistency with adopted plan documents. The CPA would specifically amend the Other Community Facilities map (Figure 24) to add a "church" symbol which would designate the site as a church and allow the proposed religious assembly use. No change to the Community Plan's Land Use map (Figure 4) nor the site's residential zoning is proposed; however, a church use is proposed within the residential land use designation and zoning.

General Plan Consistency

A summary discussion of the project's consistency with the various applicable elements of the General Plan is provided herein with the details located at the end of this section wherein specific policy references are provided in Table 5.1-1, *City of San Diego General Plan Land Use Goals, Objectives, and Policies Consistency Evaluation*.

With regard to the Land Use and Community Planning Element, the project requires approval of a CPA to add "church" symbol to the Other Community Facilities figure in the Navajo Community Plan but would maintain the site's residential land use designation consistent with Policies ~~LU-C.3~~, LU-D.1, LU-D.3 and LU-D.8.

The General Plan Urban Design Element addresses urban form and design through policies aimed at respecting the natural environment and preserving open space systems. The project supports and implements a number of the policies of the Urban Design Element (as described in Section 5.5, *Visual Effects and Neighborhood Character*). Specifically, the project design would be sensitive to the adjacent natural areas off-site (Policy UC-A.3); sustainable building materials would be used (Policy UC-A.4); the building and parking structure's architecture and site plan layout would be compatible with but distinctive from the neighborhood character and community while minimizing the visibility of its features (Policies UC-A.5, UD-A.11, and UD-A.12); extensive landscape materials would be used to define spaces, encourage circulation paths, highlight entry points, provide visual relief, shade parking areas, and screen retaining walls and off-site properties (Policy UD-A.8); and the improvements to College Avenue would enhance the streetscape while providing screening to the site improvements (Policies UD-A.10, UD-B.4, and UD-C.7), among other policy-related expectations of the General Plan.

The project would provide on-site water, sewer, and stormwater infrastructure that are sized based on the project's demands, and levels of service would be maintained after project construction is complete, consistent with the Public Facilities, Services, and Safety Element Policies PF-C.1, PF-F.6, and PF-G.1 through PF-G.5. Seismic safety features would be integrated into the project in accordance with Policy PF-Q.1.

Sustainability features and practices of the project combined with the architectural and landscape design elements would establish a theme for the property and incorporate green building techniques in accordance with the California Building Code (CBC) and GHG reduction strategies in the project's CAP Consistency Checklist, in accordance with Policy CE-A.5 of the Conservation Element. The project would implement a waste management plan (WMP), consistent with the City's goals concerning waste management and reduction in Conservation Element Policies CE-A.8 through CE-A.12. In addition, the project includes flow-through biofiltration planters to collect and treat runoff before it is discharged to the off-site stormwater system, in accordance with the urban runoff goals of Conservation Element Policies CE-E.2, CE-E.3, and CE-E.6. The project's landscaping would meet the City's water conservation and urban forestry goals in compliance with Policies CE-I.4 and CE-J.4

With respect to the General Plan policies concerning noise and land use compatibility, the project is located in an area surrounded by urban uses and experiences transportation noise from major roadways and freeways. The project is consistent with the land use-noise compatibility standards in the Noise Element (refer to Table 5.4-3 in this EIR); therefore, the project is consistent with

Policies NE-A.2, NE-A.4, NE-A.5, and NE-B.1 through NE-B.3 pertaining to land use compatibility, as discussed further below under Impact 5.

Overall, the project design is reflective of the goals and policies intended to support the General Plan policies. Therefore, land use impacts related to policy consistency with the General Plan would be less than significant. Refer to Table 5.1-1 at the end of this section for a detailed discussion of the project's General Plan policy compliance.

Climate Action Plan Consistency

The project would help implement the goals and objectives of the CAP by promoting energy and water efficient buildings, including design strategies to encourage bicycling, walking, and transit use. The proposed project contains specific features for multi-modal improvements that would facilitate access to transit and reduce visitor reliance on single-occupancy vehicles through the use of electric vehicle charging stations, bicycle parking spaces, and parking spaces designated for a combination of low-emitting, fuel-efficient, and carpool/vanpool vehicles in accordance with the CAP Consistency Checklist as referenced in Chapter 3, *Project Description* (Baranek Consulting Group 2021; Appendix B to this EIR). Land use impacts related to policy consistency with the CAP would be less than significant.

Community Plan Consistency

The project requires approval of a CPA to add "church" use to the Other Community Facilities Map map in the Community Plan, similar to other religious institutions in the community, as described in the *Project Description* chapter of this EIR. The Navajo Community Plan Land Use map does not provide a separate land use designation for churches or places of religious assembly. Instead, these types of community facilities are identified as "church" on the Other Community Facilities map (Figure 24) of the Navajo Community Plan (as shown in Figure 3-7 of the EIR). The proposed CPA would retain the Single Family residential land use designation on the Community Plan's Land Use map (Figure 4) and identify and designate the site for church use like other similar uses in the Navajo community.

The proposed CPA was initiated by the City Planning Commission at their July 19, 2018, meeting. Issues identified during the CPA initiation process addressed site design relative to the natural environment of the site; the appropriateness of the land use for the site; and access to the site with regard to the Navajo community, all of which are addressed in Chapter 5, *Environmental Analysis*, Chapter 6, *Cumulative Impacts*, and Chapter 7, *Other CEQA Considerations*, of this EIR.

~~With regard to the principal objective of the Community Plan to maintain, enhance and encourage residential housing, the project would maintain the existing residential land use designation and zoning on the site. A project objective is to provide a church-owned property for an existing congregation and would involve the construction of a non-residential, religious assembly use rather than housing. Accordingly, the project has been designed to be sensitive to the existing neighborhood. With regard to the Residential Element policies that are applicable to non-residential development in the Community, the site layout and architectural design incorporate careful planning and sensitive development features that: would create a well-defined, balanced and visually consistent design that is distinctive from the surrounding residential neighborhood; would be situated in the topographic low point of the site near the College Avenue off-ramp and setback~~

from the adjacent, lower profile residential and commercial structures nearby; would feature extensive landscaping, including screening along the common property line with the nearby residential yards to conceal and soften views of facilities, walls and rooftops; would produce a positive visual appearance through its comprehensive design from public vantage points that surround the site; would screen or conceal parking areas with landscaping or structures from public viewing points; and would use imaginative and innovative design to create visual interest and aesthetic appeal.

The Community Environment Element of the Community Plan encourages an overall quality of design through building placement, landscaping, and natural elements. The project would be consistent with the policies in the Community Plan through its comprehensive design that coordinates its grading, architecture, and landscape to collectively provide visual interest and break up the massing of the structures such that the project would not exceed the bulk and scale of existing patterns of development by a substantial margin. The project's landscape improvements along College Avenue would remove the existing sidewalk and create a landscaped parkway with non-contiguous sidewalk featuring street side canopy trees and ground cover. The project balances its placement between urban uses with its proximity to undeveloped areas by creating grading and landscape transitions and installing biofiltration basins to protect water quality.

Circulation policies in the Community Plan are also adhered to since project improvements along the frontage would create a signalized intersection, an upgraded sidewalk experience, pedestrian linkages into the site and striping to create a bike lane. The visual character of College Avenue would be enhanced through landscape treatments and the installation of canopy trees within the parkway.

As shown in **Table 5.1-2, Navajo Community Plan Goals and Recommendations Consistency Evaluation**, the proposal to add the church use to the project site would not create any inconsistencies with the policies in the Community Plan (as illustrated in Figure 3-1 through Figure 3-6 of this EIR) and less-than-significant land use policy impacts are identified.

Land Development Code Regulations Consistency

A PDP is required for the church use on the project site as that the project complies with the applicable land use plan designation but is not permitted in the underlying base residential zone (i.e., RS-1-7), pursuant to SDMC Section 126.0602(a)(2). Approval of the CPA would allow the religious assembly use within the residential designation to be consistent with the Community Plan. The PDP would allow for the religious assembly use within the RS-1-7 zone and would also allow approval of deviations from the development regulations of the zone. There are four proposed deviations from the RS-1-7 development regulations that would be allowed by approval of the PDP (as summarized in Table 3-1 in Chapter 3, *Project Description*). The deviations pertain to increased building height to construct a structure that conveys an institutional use and creates architectural interest; increased retaining wall height to create buildable pads and avoid grading in the Caltrans ROW; reduced side yard setback to accommodate the irregular lot configuration relative to College Avenue; and to correlate the required number of long-term bike parking spaces to the number of staff, instead of the congregation who are short-term bicycle users. The proposed deviations related to the project design features would result in less-than-significant aesthetic impacts as discussed in Section 5.5, *Visual Effects and Neighborhood Character*, of this EIR.

Impacts to sensitive habitat on-site require approval of an SDP. Mitigation would be required to offset the project's direct impacts to sensitive habitat outside the City of San Diego's Multi-Habitat Planning Area (MHPA) and would comply with the City's MSCP, as enforced by compliance with the ESL Regulations of the City's LDC. Therefore, the project would result in less-than-significant land use impacts with mitigation incorporated. The sensitive resources mitigation requirements are discussed in Section 5.2, *Biological Resources*, of this EIR.

5.1.3.3 Significance of Impacts

Potential land use plan consistency impacts would be less than significant because the proposed use and project design would be consistent with existing applicable local and regional land use plans, policies, and regulations as discussed above. The project would not be inconsistent or conflict with the environmental goals, objectives, or guidelines of a community or General Plan, nor would it result in indirect or secondary environmental impacts. Upon approval of the CUP, PDP, and SDP, the project would not be substantially incompatible with an adopted plan. Therefore, no significant impacts related to land use policies would occur.

5.1.3.4 Mitigation Monitoring and Reporting

No significant impacts are identified; no mitigation measures are required.

5.1.4 Impact 2: Physical Community Division

Issue 3: Would the project physically divide an established community?

5.1.4.1 Impact Threshold

According to the City's Significance Determination Thresholds (2020), land use policy impacts may be significant if the project would be:

- Physically divide an established community.

5.1.4.2 Impact Analysis

The project site is designated and zoned for residential use. The surrounding project area is composed of residential neighborhoods interspersed with commercial, educational, and religious facilities, as well as undeveloped hillsides and open space. The project site generally sits below the residential lots to the east and does not have access to neighborhood streets. The site is separated from the neighborhood to the west by College Avenue, a major street. The project is proposed on an infill site located between College Avenue and a residential neighborhood to the east. No change to the local circulation patterns would occur as the project would involve the extension of a private driveway and secondary entrance to the site along College Avenue. In addition, the project would not introduce any barriers or project features that could physically divide the established Navajo community.

5.1.4.3 Significance of Impacts

The project would not physically divide an established community and a less-than-significant land use impact would occur.

5.1.4.4 Mitigation Monitoring and Reporting

No significant impacts are identified; no mitigation measures are required.

5.1.5 Impact 3: Compatibility with Airport Comprehensive Land Use Plan

Issue 4: Would the project result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP), including aircraft safety and noise levels as defined by the plan?

5.1.5.1 Impact Threshold

According to the City's Significance Determination Thresholds (2020), land use policy impacts may be significant if the project would be:

- An incompatible use as defined in an airport land use plan or would result in an inconsistency with an airport's Land Use Compatibility Plan, as adopted by the Airport Land Use Commission (ALUC), to the extent that the inconsistency is based on valid data.

5.1.5.2 Impact Analysis

The project site is in the Airport Land Use Compatibility Overlay Zone (ALUCOZ) and AIA for Montgomery Field. Review Area 2 of the AIA consists of locations within the airspace protection and/or overflight notification areas. Limits on the heights of structures, particularly in areas of high terrain, are the only restrictions on land uses within Review Area 2. Although the project site is located in Review Area 2 for Montgomery Field, the City determined that a ALUCP review of the project would be unnecessary because of the site's location topographically below surrounding land uses and the building's low stature relative to airspace restrictions. Project implementation would not increase the potential for a safety hazard related to airports for people residing or working in areas surrounding the project site. The project would not interfere with the operations of the airport; less-than-significant impacts would occur.

5.1.5.3 Significance of Impacts

The project would not conflict with the ALUCOZ and ALUCP, nor would it interfere with operations of Montgomery Field; therefore, impacts would be less than significant.

5.1.5.4 Mitigation Monitoring and Reporting

No significant impacts are identified; no mitigation measures are required.

5.1.6 Impact 4: Potential Exposure to Excessive Noise Levels

Issue 5: Would the proposal result in the exposure of sensitive receptors to current or future noise levels that would exceed standards established in the Noise Element of the General Plan?

5.1.6.1 Impact Threshold

According to the City's Significance Determination Thresholds (2020), land use policy impacts may be significant if the project would be:

- Expose new development to noise levels at exterior use areas or interior areas in excess of the noise compatibility guidelines established in the City General Plan Noise Element (shown in Table 5.4-3).

5.1.6.2 Impact Analysis

The City's land use-noise compatibility table provides a tool to gauge the compatibility of new land uses relative to existing noise levels. The table, presented as Table 5.4-3 in Section 5.4, *Noise*, of this EIR, identifies compatible, conditionally compatible, and incompatible noise levels for various land uses. According to the table, the land use-noise compatibility standard applied to places of worship or religious assembly spaces is 75 decibels (dBA). As shown in Table 5.4-1, the ambient noise level recorded on the project site is 68.7 decibel (dBA) Community Noise Equivalent Level (CNEL) and Table 5.4-6 shows that noise levels in the vicinity of the project would not exceed this level in the Existing Plus Project condition. Therefore, the proposed church use would be compatible with the on-site noise environment and less-than-significant land use impacts related to noise compatibility would occur.

5.1.6.3 Significance of Impacts

The proposed church would be compatible with the City's Noise Element of the General Plan. Therefore, no significant impacts related to noise-land use compatibility would occur.

5.1.6.4 Mitigation Monitoring and Reporting

No significant impacts are identified; no mitigation measures are required.

**Table 5.1-1
 CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN		
Land Use and Community Planning Element		
General Plan Land Use Categories Goals		
<i>Policy LU-C.3:</i> Maintain or increase the City's supply of land designated for various residential densities as community plans are prepared, updated, or amended.	The project requires approval of a CPA to the Navajo Community Plan to allow a church/religious assembly use for the project site. Approval of the CPA would not change the site's underlying residential land use designation and zoning. The project would comply with Policy LU-C.3.	Yes
<i>Policy LU-D.1:</i> Require a General Plan and community plan amendment for proposals that involve: a change in community plan adopted land use or density/intensity range; a change in the adopted community plan development phasing schedule; or a change in plan policies, maps, and diagrams	The project proposes a CPA to the Navajo Community Plan to address the change in land use needed to allow the religious assembly use. The project would comply with Policy LU-D.1.	Yes
<i>Policy LU-D.3:</i> Evaluate all privately proposed plan amendment and City-initiated land use designation amendment requests through the plan amendment initiation process and present the proposal to the Planning Commission or City Council for consideration.	The CPA was initiated in June 2018 through a hearing with the Planning Commission. The project would comply with Policy LU-D.3.	Yes
<i>Policy LU-D.5:</i> Maintain and update on a regular basis a database of land use plan amendments approved by the City in order to create an annual report for tracking of land use plan amendments.	The project proposes a CPA that upon approval can be recorded by the City in its database consistent with Policy LU-D.5.	Yes
<i>Policy LU-D.8:</i> Require that General Plan and community plan amendment initiations be decided by the Planning Commission with the ability for the applicant to submit a request to the City Clerk for the City Council to consider the initiation if it is denied. The applicant must file the request with the City Clerk within 10 business days of the Planning Commission denial.	The CPA was initiated in June 2018 at a hearing with the Planning Commission. The project would comply with Policy LU-D.8.	Yes

**Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<p><i>Policy LU-D.10:</i> Require that the recommendation of approval or denial to the Planning Commission be based upon compliance with all of the three initiation criteria as follows: a) the amendment request appears to be consistent with the goals and policies of the General Plan and community plan and any community plan specific amendment criteria; b) the proposed amendment provides additional public benefit to the community as compared to the existing land use designation, density/intensity range, plan policy or site design; and c) public facilities appear to be available to serve the proposed increase in density/ intensity, or their provision will be addressed as a component of the amendment process.</p>	<p>The proposed CPA was reviewed and initiated by Planning Commission in a June 2018 hearing in accordance with Policy LU-D.10.</p>	<p>Yes</p>
<p><i>Policy LU-D.11:</i> Acknowledge that initiation of a plan amendment in no way confers adoption of a plan amendment, that neither staff nor the Planning Commission is committed to recommend in favor or denial of the proposed amendment, and that the City Council is not committed to adopt or deny the proposed amendment.</p>	<p>The proposed CPA was initiated in June 2018 at a hearing with the Planning Commission. The project would comply with Policy LU-D.11.</p>	<p>Yes</p>
<p><i>Land Use and Community Planning Element Polices Related to Zoning Consistency</i></p>		
<p><i>Policy LU-F.2:</i> Review public and private projects to ensure that they do not adversely affect the General Plan and community plans. Evaluate whether proposed projects implement specified land use, density/intensity, design guidelines, and other General Plan and community plan policies including open space preservation, community identity, mobility, and the timing, phasing, and provision of public facilities.</p>	<p>The proposed site design improvements and off-site improvements and utility infrastructure improvements would be consistent with this policy from the General Plan.</p>	<p>Yes</p>

**Table 5.1-1
 CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Urban Design Element		
Sustainable Development		
<p><i>Policy UD-A.3.</i> Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development.</p> <ul style="list-style-type: none"> a. Provide increased setbacks from canyon rims or open space areas to ensure that the visibility of new development is minimized. b. Screen development adjacent to natural features as appropriate so that development does not appear visually intrusive, or interfere with the experience within the open space system. The provision of enhanced landscaping adjacent to natural features could be used to soften the appearance of or buffer development from the natural features. c. Use building and landscape materials that blend with and do not create visual or other conflicts with the natural environment in instances where new buildings abut natural areas. This guideline must be balanced with a need to clear natural vegetation for fire protection to ensure public safety in some areas. d. Design and site buildings to permit visual and physical access to the natural features from the public right-of-way. e. Encourage location of entrances and windows in development adjacent to open space to overlook the natural features. f. Protect views from public roadways and parklands to natural canyons, resource areas, and scenic vistas. 	<p>The project site is not adjacent to lands designated for open space but rather residentially designated undeveloped lands that reside below nearby homes. A 2.0-acre parkland parcel is situated south of the property. The project design would create landscaped, manufactured slopes that would blend with the off-site terrain and parkland to the south and east. The proposed structures would be setback from and/or recessed into the terrain such that they would not block views of the adjacent slopes from the public rights of way. The project would be consistent with this policy from the General Plan.</p>	<p>Yes</p>

**Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<p><i>Policy UD-A.4.</i> Use sustainable building methods in accordance with the sustainable development policies in the Conservation Element.</p>	<p>Consistent with Policy UD-A.4, the project would incorporate the following sustainable design features as conditions of approval to minimize use of water, energy, and solid waste:</p> <ul style="list-style-type: none"> • Cool/green roofs • Use of low-flow fixtures/appliances and low-flow irrigation • Electrical vehicle charging stations • Designated and secure bicycle parking spaces • Designated parking spaces low-emitting, fuel-efficient, and carpool/vanpool vehicles • Implementation of a solid waste recycling plan 	<p>Yes</p>
<p>Architecture</p>		
<p><i>Policy UD-A.5.</i> Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.</p> <ol style="list-style-type: none"> a. Relate architecture to San Diego’s unique climate and topography. b. Encourage designs that are sensitive to the scale, form, rhythm, proportions, and materials in proximity to commercial areas and residential neighborhoods that have a well-established, distinctive character. c. Provide architectural features that establish and define a building’s appeal and enhance the neighborhood character. d. Encourage the use of materials and finishes that reinforce a sense of quality and permanence. e. Provide architectural interest to discourage the appearance of blank walls for development. This would include not only building walls, but fencing bordering the pedestrian network, where some form of architectural variation should be provided to add interest to the streetscape and enhance the pedestrian 	<p>As indicated in Policy UD-A.5, the project would exhibit a contemporary Spanish Colonial Revival-style theme featuring arched entrances and windows along its painted concrete tilt-up facades, with accents of wood facia and terra cotta colored tile roofing materials. The glazing for each window would be tinted bronze in color. The architectural style resembles that of academic buildings at the SDSU campus which is visible from the project site.</p> <p>With regard to the architectural design and scale, the majority of the church/sanctuary building and its parapet wall around the flat roof areas would comply with the 30-foot height limit in the RS-1-7 zone. To create visual interest, the pitched roof towers would extend up to 45 to 48 feet above grade and the rooftop extension (i.e., cross on the west elevation) would extend an additional 8 feet above the 45-foot roof tower to 53 feet above grade, requiring a deviation from the RS-1-7 zone development regulations. The building rooflines and cross would be set back from the adjacent residential lots along Marne Avenue and the west end of Glenmont Street. Articulated façades and landscape treatment would be provided to increase visual interest and create a cohesive design. The project would highlight natural materials and colors, usable outdoor spaces, and</p>	<p>Yes</p>

**Table 5.1-1
 CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<p>experience. For example, walls could protrude, recess, or change in color, height or texture to provide visual interest.</p> <p>f. Design building wall planes to have shadow relief, where pop-outs, offsetting planes, overhangs and recessed doorways are used to provide visual interest at the pedestrian level.</p> <p>g. Maximize natural ventilation, sunlight, and views.</p> <p>h. Provide convenient, safe, well-marked, and attractive pedestrian connections from the public street to building entrances.</p>	<p>climate-appropriate, and drought-tolerant landscaping. Refer to Section 5.5, <i>Visual Effects and Neighborhood Character</i>, for additional details on the project’s compliance with Policy UD-A.5.</p>	
<p><i>Policy UD-A.8.</i> Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.</p> <p>a. Maximize the planting of new trees, street trees and other plants for their shading, air quality, and livability benefits (see also Conservation Element, Policies CE-A.11, CE-A.12, and Section J)</p> <p>b. Use water conservation through the use of drought-tolerant landscape, porous materials, and reclaimed water where available.</p> <p>c. Use landscape to support storm water management goals for filtration, percolation and erosion control.</p> <p>d. Use landscape to provide unique identities within neighborhoods, villages and other developed areas.</p> <p>e. Landscape materials and design should complement and build upon the existing character of the neighborhood.</p> <p>f. Design landscape bordering the pedestrian network with new elements, such as a new plant form or material, at a scale and intervals appropriate to the site. This is not intended to discourage a uniform street tree or landscape theme, but to add interest to the streetscape and enhance the pedestrian experience.</p>	<p>The proposed landscape plan features the use of native/naturalized and/or drought-tolerant plant material throughout the project site (see Figure 3-6). Plant material would be used throughout the site to help define spaces, encourage circulation paths, highlight entry points, provide visual relief, shade parking areas, and screen retaining walls and off-site properties. On site landscaping would include canopy trees and raised box plantings on the upper deck of the parking structure and in the parking areas, accent planting zones featuring palms and focal point species, and ground cover, shrubs and trees used for slope plantings. A minimum 5-foot-wide landscape buffer containing spreading ground covers, taller screening shrubs and canopy trees, ranging in height from 25 to 40 feet, would be installed between the proposed surface parking areas and residential properties to the east. Landscape improvements along College Avenue would create a 10- to 16-foot-wide landscaped parkway with sidewalk featuring street side canopy plantings and ground covers. In addition, plant material would be placed within the stormwater biofiltration basins that would be constructed as part of the project. Entry monumentation and landscape treatments would be installed on site at the southeast corner near the driveway entrance to provide aesthetic appeal and give identification to the project entry. The project would comply with Policy UD-A.8.</p>	<p>Yes</p>

**Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<p>g. Establish or maintain tree-lined residential and commercial streets. Neighborhoods and commercial corridors in the city that contain tree-lined streets present a streetscape that creates a distinctive character.</p> <ol style="list-style-type: none"> 1. Identify and plant trees that complement and expand on the surrounding street tree fabric. 2. Unify communities by using street trees to link residential areas. 3. Locate street trees in a manner that does not obstruct ground illumination from streetlights. <p>h. Shade paved areas, especially parking lots.</p> <p>i. Demarcate public, semi-public/private, and private spaces clearly through the use of landscape, walls, fences, gates, pavement treatment, signs, and other methods to denote boundaries and/or buffers.</p> <p>j. Use landscaped walkways to direct people to proper entrances and away from private areas.</p> <p>k. Reduce barriers to views or light by selecting appropriate tree types, pruning thick hedges, and large overhanging tree canopies.</p> <p>l. Utilize landscape adjacent to natural features to soften the visual appearance of a development and provide a natural buffer between the development and open space areas.</p>		

**Table 5.1-1
 CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Street Design		
<p><i>Policy UD-A.10.</i> Design or retrofit streets to improve walkability, bicycling, and transit integration; to strengthen connectivity; and to enhance community identity. Streets are an important aspect of Urban Design as referenced in the Mobility Element (see also Mobility Element, Sections A, B, C, and F).</p>	<p>Off-site improvements to the College Avenue intersection would include creating a break and narrowing of the existing raised median, constructing a new southbound left-turn lane, striping a northbound right-turn lane and installing a crosswalk. A new traffic signal would be installed at the completed intersection. To enhance the pedestrian experience along the project's College Avenue frontage, a 12-foot shared (i.e., pedestrians and bicycles) contiguous sidewalk would be installed south of the project driveway and north of the driveway a 5-foot-wide, non-contiguous sidewalk and landscaped parkway with street trees would be constructed. Canopy trees and other plant material would be installed adjacent to the sidewalks to enhance the pedestrian experience. Stairs and a ramp would be extended on site to link the College Avenue sidewalk to the church/sanctuary building and entry plaza. The proposed improvements would enhance the bicycle circulation and pedestrian environment consistent with Policy UD-A.10.</p>	<p>Yes</p>
<p><i>Policy UD-A.11.</i> Encourage the use of underground or above-ground parking structures, rather than surface parking lots, to reduce land area devoted to parking (see also Mobility Element, Section G).</p> <ul style="list-style-type: none"> a. Design safe, functional, and aesthetically pleasing parking structures. b. Design structures to be of a height and mass that are compatible with the surrounding area. c. Use building materials, detailing, and landscape that complement the surrounding neighborhood. d. Provide well-defined, dedicated pedestrian entrances. e. Use appropriate screening mechanisms to screen views of parked vehicles from pedestrian areas, and headlights from adjacent buildings. 	<p>The project includes a two-level parking structure that would be recessed into the terrain such that the top deck would be below grade of College Avenue. The lower and upper parking levels of the structure would be connected through an internal vehicle ramp. The primary surface parking lot would be constructed north of the parking structure at grade with College Avenue and connected to the upper level of the parking structure via internal roads. Smaller surface parking areas would be provided behind the parking structure and church/sanctuary building as shown on the project site plan (Figure 3-1). The project's distinctive architecture and landscaping would create a positive aesthetic while integrating screening from the nearby community. The project would be consistent with Policy UD-A.11.</p>	<p>Yes</p>

**Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<ul style="list-style-type: none"> f. Pursue development of parking structures that are wrapped on their exterior with other uses to conceal the parking structure and create an active streetscape. Where ground floor commercial is proposed, provide a tall, largely transparent ground floor along pedestrian active streets. g. Encourage the use of attendants, gates, natural lighting, or surveillance equipment in parking structures to promote safety and security. 		
<p><i>Policy UD-A.12.</i> Reduce the amount and visual impact of surface parking lots (see also Mobility Element, Section G).</p> <ul style="list-style-type: none"> a. Encourage placement of parking along the rear and sides of street-oriented buildings. b. Avoid blank walls facing onto parking lots by promoting treatments that use colors, materials, landscape, selective openings or other means of creating interest. For example, the building should protrude, recess, or change in color, height or texture to reduce blank facades. c. Design clear and attractive pedestrian paseos/pathways and signs that link parking and destinations. d. Locate pedestrian pathways in areas where vehicular access is limited. e. Avoid large areas of uninterrupted parking especially adjacent to community public view sheds. f. Build multiple small parking lots in lieu of one large lot. g. Retrofit existing expansive parking lots with street trees, landscape, pedestrian paths, and new building placement. h. Promote the use of pervious surface materials to reduce runoff and infiltrate storm water. 	<p>The project would limit the amount and visibility of the parking areas by recessing the two-story parking structure into the terrain and placing the surface parking at grade with its top deck and behind the parking structure and church/sanctuary building. The entrances to the parking structure would be demarcated with arched entry points which align with the entry to the building and surface parking areas to the east. Pedestrian pathways between the parking structure and building entrance would feature entry landscaping and be clearly marked at the concrete driveway as shown in Figure 3-6. The project would be consistent with Policy UD-A.12.</p>	<p>Yes</p>

**Table 5.1-1
 CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
i. Use trees and other landscape to provide shade, screening, and filtering of storm water runoff in parking lots (see also Conservation Element, Policy CE-A.12). j. Design surface parking lots to allow for potential redevelopment to more intensive uses. For example, through redevelopment, well-placed parking lot aisles could become internal project streets that provide access to future parking structures and mixed land uses.		
Lighting		
<p><i>Policy UD-A.13.</i> Provide lighting from a variety of sources at appropriate intensities and qualities for safety.</p> a. Provide pedestrian-scaled lighting for pedestrian circulation and visibility. b. Use effective lighting for vehicular traffic while not overwhelming the quality of pedestrian lighting. c. Use lighting to convey a sense of safety while minimizing glare and contrast. d. Use vandal-resistant light fixtures that complement the neighborhood and character. e. Focus lighting to eliminate spill-over so that lighting is directed, and only the intended use is illuminated.	Lighting would be provided in various settings for safety and aesthetic purposes. Lighting would be provided in the surface parking lots, parking lot, private driveway, and along pedestrian walkways. Lighting for all of these purposes would be intentionally directed such that the intended area is illuminated and spillover lighting into sensitive areas (e.g., residences) is avoided as required by SDMC Section 142.0740. These lighting practices would be consistent with Policy UD-A.13.	Yes

**Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Utilities		
<p><i>Policy UD-A.16.</i> Minimize the visual and functional impact of utility systems and equipment on streets, sidewalks, and the public realm.</p> <ul style="list-style-type: none"> a. Convert overhead utility wires and poles, and overhead structures such as those associated with supplying electric, communication, community antenna television, or similar service to underground. b. Design and locate public and private utility infrastructure, such as phone, cable and communications boxes, transformers, meters, fuel ports, back-flow preventers, ventilation grilles, grease interceptors, irrigation valves, and any similar elements, to be integrated into adjacent development and as inconspicuous as possible. c. To minimize obstructions, elements in the sidewalk and public right of way should be located in below grade vaults or building recesses that do not encroach on the right of way (to the maximum extent permitted by codes). If located in a landscaped setback, they should be as far from the sidewalk as possible, clustered and integrated into the landscape design, and screened from public view with plant and/or fencelike elements. d. Traffic operational features such as streetlights, traffic signals, control boxes, street signs and similar facilities should be located and consolidated on poles, to minimize clutter, improve safety, and maximize public pedestrian access, especially at intersections and sidewalk ramps. Other street utilities such as storm drains and vaults should be carefully located to afford proper placement of the vertical elements. 	<p>All utilities to serve the project would be installed during construction and undergrounded, as described in Section 7.1.13 Utilities and Service Systems. Therefore, the project would result in minimal visual intrusion related to utility systems, consistent with Policy UD-A.16. Visual clutter related to utility systems and traffic control would be avoided through proper siting, screening, and integration into structures. The project would minimize the visibility of utility systems consistent with Policy UD-A.16.</p>	<p>Yes</p>

**Table 5.1-1
 CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Street Frontages		
<p><i>Policy UD-B.4.</i> Create street frontages with architectural and landscape interest for both pedestrians and neighboring residents.</p> <ul style="list-style-type: none"> a. Locate buildings on the site so that they reinforce street frontages. b. Relate buildings to existing and planned adjacent uses. c. Provide ground level entries and ensure that building entries are prominent and visible. d. Maintain existing setback patterns, except where community plans call for redevelopment to change the existing pattern. e. Locate transparent features such as porches, stoops, balconies, and windows facing the street to promote a sense of community. f. Encourage side- and rear-loaded garages. Where not possible, reduce the prominence of the garage through architectural features and varying planes. g. Minimize the number of curb-cuts along residential streets. 	<p>The church/sanctuary building and parking structure would be setback from College Avenue and recessed into the terrain. The aesthetics of the streetscape and entry monumentation would be enhanced with the installation of a parkway with landscaping as shown in the visual simulations provided in Section 5.5, <i>Visual Effects and Neighborhood Character</i>. The project would be consistent with Policy UD-B.4.</p>	<p>Yes</p>
Streetscape		
<p><i>Policy UD-C.7.</i> Enhance the public streetscape for greater walkability and neighborhood aesthetics (see also Policy UD-A.10 and Section F.)</p> <ul style="list-style-type: none"> b. Establish build-to lines, or maximum permitted setbacks on designated streets. c. Design or redesign buildings to include architecturally interesting elements, pedestrian- friendly entrances, outdoor dining areas, transparent windows, or other means that emphasize human-scaled design features at the ground-floor level. 	<p>Consistent with Policy UD-C.7, both internal walkways and the sidewalk along College Avenue would be designed to provide opportunities for pedestrian activity. A combination of street trees and shrubs would be provided along the street to create a landscaped parkway and provide shade and visual interest adjacent to the sidewalks. The project's landscape design would establish a theme for the property that would complement the project architecture by providing a variety of trees, shrubs, vines, and ground cover to accent building architecture, where needed.</p>	<p>Yes</p>

**Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<i>Civic Architecture and Landmarks</i>		
<p><i>Policy UD-E.2.</i> Treat and locate civic architecture and landmark institutions prominently.</p> <ul style="list-style-type: none"> a. Where feasible, provide distinctive public open space, public art, greens, and/or plazas around civic buildings such as courthouses, libraries, post offices, and community centers to enhance the character of these civic and public buildings. Such civic and public buildings are widely used and should form the focal point for neighborhoods and communities. b. Incorporate sustainable building principles into building design (see also Conservation Element, Section A). c. Civic buildings at prominent locations, such as canyon rims, sites fronting open space, sites framing a public vista, and those affording a silhouette against the sky should exhibit notable architecture. d. Encourage innovative designs that civic and public buildings and landmarks from the surrounding neighborhood as a means of identifying their role as focal points for the community. e. Support the preservation of community landmarks. 	<p>Consistent with Policy UD-E.2, the church/sanctuary structure would be architecturally distinctive from the nearby single-family residences in the community. With its location adjacent to the College Avenue interchange, the structure would be a focal point for the community with its notable contemporary Spanish Colonial Revival-style theme featuring arched entrances and windows while also identifying its role as a place of worship through its rooftop features and signage. The project design would implement sustainable building features to minimize use of water, energy, and solid waste. Therefore, the project would be consistent with this policy from the General Plan.</p>	<p align="center">Yes</p>

**Table 5.1-1
 CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Public Facilities, Services, and Safety Element		
<i>Evaluation of Growth, Facilities, and Services Goals</i>		
<p>Adequate public facilities that are available at the time of need and public facilities exactions that mitigate the facilities impacts that are attributable to new development.</p> <p><i>Policy PF-C.1.</i> Require development proposals to fully address impacts to public facilities and services.</p> <ul style="list-style-type: none"> a. Identify the demand for public facilities and services resulting from discretionary projects. b. Identify specific improvements and financing which would be provided by the project, including but not limited to sewer, water, storm drain, solid waste, fire, police, libraries, parks, open space, and transportation projects. c. Subject projects, as a condition of approval, to exactions that are reasonably related and in rough proportionality to the impacts resulting from the proposed development. d. Provide public facilities and services to assure that current levels of service are maintained or improved by new development within a reasonable time period. 	<p>The project would construct the necessary utilities to service the project, including water, sewer, and stormwater systems on-site to connect with existing off-site utilities within public roads. The sizing of the lines would be based on demand from the project. Levels of service would be maintained after the project construction is complete and fully occupied, as described in Section 7.1.13, <i>Utilities and Service Systems</i>.</p>	<p>Yes</p>
<i>Wastewater Goals</i>		
<p>Environmentally sound collection, treatment, reuse, disposal, and monitoring of wastewater and increased use of reclaimed water to supplement the region's limited water supply.</p> <p><i>Policy PF-F.6.</i> Coordinate land use planning and wastewater infrastructure planning to provide for future development and maintain adequate service levels.</p>	<p>The project would tie into the regional wastewater system and would comply with all applicable City standards concerning wastewater collection. As discussed in Section 7.1.13, <i>Utilities and Service Systems</i>, the existing collection system has capacity to accommodate wastewater from the project.</p>	<p>Yes</p>

**Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Stormwater Infrastructure Goals		
<p>Protection of beneficial water resources through pollution prevention and interception efforts; and a stormwater conveyance system that effectively reduces pollutants in urban runoff and stormwater to the maximum extent practicable.</p> <p><i>Policy PF-G.1.</i> Ensure that all stormwater conveyance systems, structures, and maintenance practices are consistent with federal Clean Water Act and California Regional Water Quality Control Board NPDES [National Pollutant Discharge Elimination System] Permit standards.</p> <p><i>Policy PF-G.2.</i> Install infrastructure that includes components to capture, minimize, and/or prevent pollutants in urban runoff from reaching receiving waters and potable water supplies.</p> <p><i>Policy PF-G.3.</i> Meet and preferably exceed regulatory mandates to protect water quality in a cost-effective manner monitored through performance measures.</p> <p><i>Policy PF-G.5.</i> Identify and implement BMPs for projects that repair, replace, extend or otherwise affect the stormwater conveyance system. These projects should also include design considerations for maintenance, inspection, and, as applicable, water quality monitoring.</p>	<p>All stormwater conveyance systems, structures, and maintenance practices would be consistent with the Clean Water Act and California Regional Water Quality Control Board National Pollutant Discharge Elimination System (NPDES) Permit standards and City's stormwater regulations to protect water quality, as discussed in Section 7.1.14, <i>Water Quality</i>. The project would, therefore, be consistent with Policies PF-G.1, PF-G.2, PF-G.3, and PF-G.5.</p>	<p>Yes</p>

**Table 5.1-1
 CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Waste Management Goals		
<p>Maximum diversion of materials from disposal through the reduction, reuse, and recycling of wastes to the highest and best use. <i>Policy PF-I.2.</i> Maximize waste reduction and diversion (see also Conservation Element, Policy CE.A.9).</p> <p>d. Maximize the separation of recyclable and compostable materials.</p> <p>f. Reduce and recycle Construction and Demolition (C&D) debris. Strive for recycling of 100 percent of inert C&D materials and a minimum of 50 percent by weight of all other material.</p> <p>g. Use recycled, composted, and post-consumer materials in manufacturing, construction, public facilities and in other identified uses whenever appropriate.</p> <p>h. Encourage the private sector to build a mixed construction and demolition waste materials recycling facility.</p>	<p>A WMP was prepared for the project that concluded the project would not have direct or cumulative impacts on solid waste management facilities (Appendix L). Implementation of the WMP would minimize waste deposited in landfills and the project would be consistent with Policies PF-I.2 and PF-I.5.</p>	<p>Yes</p>
Public Utility Goal		
<p>Public utilities services provided in the most cost-effective and environmentally sensitive way; and public utilities that sufficiently meet existing and future demand with facilities and maintenance practices that are sensible, efficient and well-integrated into the natural and urban landscape.</p> <p><i>Policy PF-M.3.</i> Integrate the design and siting of safe and efficient public utilities and associated facilities into the early stages of long-range planning and development process, especially in redevelopment/urban areas where land constraints exist.</p>	<p>The project would be consistent with this goal by relying on existing utility infrastructure in the project vicinity and relocating a public water line into College Avenue, as described in Sections 7.1.7, <i>Hydrology</i>, and 7.1.13, <i>Utilities and Service Systems</i>, that is designed in accordance with City engineering standards.</p>	<p>Yes</p>

Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Seismic Safety Goals		
<p>Protection of public health and safety through abated structural hazards and mitigated risks posed by seismic conditions; and development that avoids inappropriate land uses in identified seismic risk areas.</p> <p><i>Policy PF-Q.1.</i> Protect public health and safety through the application of effective seismic, geologic and structural considerations.</p> <p>a. Ensure that current and future community planning and other specific land use planning studies continue to include consideration of seismic and other geologic hazards. This information should be disclosed, when applicable, in the California Environmental Quality Act (CEQA) document accompanying a discretionary action.</p> <p>c. Require the submission of geologic and seismic reports, as well as soils engineering reports, in relation to applications for land development permits whenever seismic or geologic problems are suspected.</p> <p>g. Adhere to state laws pertaining to seismic and geologic hazards.</p>	<p>A geotechnical investigation was prepared for the project. There are no geotechnical hazards on site that would affect public health and safety, such as faults. As discussed in Section 7.1.4, <i>Geologic Conditions</i>, seismic risks would be less than significant considering the project would implement recommendations in the investigation and comply with CBC and other applicable City building standards. The project would not conflict with Policy PF-Q.1.</p>	<p>Yes</p>

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 CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Conservation Element		
<i>Climate Change and Sustainable Development Goals</i>		
<p>To reduce the City's overall carbon dioxide footprint by promoting energy efficiency, alternative modes of transportation, sustainable planning and design, and waste management; to be prepared for, and able to adapt to adverse climate change impacts; and to become a city that is an international model of sustainable development and conservation.</p> <p><i>Policy CE-A.5.</i> Employ sustainable or "green" building techniques for the construction and operation of buildings.</p> <p>a. Develop and implement sustainable building standards for new and significant remodels of residential and commercial buildings to maximize energy efficiency, and to achieve overall net zero energy consumption by 2020 for new residential buildings and 2030 for new commercial buildings. This can be accomplished through factors including, but not limited to:</p> <ul style="list-style-type: none"> - Designing mechanical and electrical systems that achieve greater energy efficiency with currently available technology; - Minimizing energy use through innovative site design and building orientation that addresses factors such as sun-shade patterns, prevailing winds, landscape, and sun-screens; - Employing self-generation of energy using renewable technologies; - Combining energy efficient measures that have longer payback periods with measures that have shorter payback periods; - Reducing levels of non-essential lighting, heating, and cooling; and - Using energy efficient appliances and lighting. 	<p>The project would implement green building techniques in accordance with the CBC and the project's CAP Consistency Checklist and comply with the City's goals concerning sustainability contained in Policy CE-A.5.</p>	<p>Yes</p>

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CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<p><i>Policy CE-A.8.</i> Reduce construction and demolition waste in accordance with Public Facilities Element, Policy PF-I.2, or by renovating or adding on to existing buildings, rather than constructing new buildings.</p>	<p>In compliance with the City’s waste management regulations and implementation of the waste reduction and diversion measures identified in the WMP, the project would be consistent with Policy CE-A.8, as discussed in Section 7.1.13, <i>Utilities and Service Systems</i>.</p>	<p>Yes</p>
<p><i>Policy CE-A.9.</i> Reuse building materials, use materials that have recycled content, or use materials that are derived from sustainable or rapidly renewable sources to the extent possible, through factors including:</p> <ul style="list-style-type: none"> a. Scheduling time for deconstruction and recycling activities to take place during project demolition and construction phases; b. Using life cycle costing in decision-making for materials and construction techniques. Life cycle costing analyzes the costs and benefits over the life of a particular product, technology, or system; c. Removing code obstacles to using recycled materials in buildings and for construction; and d. Implementing effective economic incentives to recycle construction and demolition debris (see also Public Facilities Element Policy PF-I.2). 	<p>In compliance with the City’s waste management regulations and implementation of the waste reduction and diversion measures identified in the WMP, the project would be consistent with Policy CE-A.9, as discussed in Section 7.1.13, <i>Utilities and Service Systems</i>.</p>	<p>Yes</p>
<p><i>Policy CE-A.10.</i> Include features in buildings to facilitate recycling of waste generated by building occupants and associated refuse storage areas:</p> <ul style="list-style-type: none"> a. Provide permanent, adequate, and convenient space for individual building occupants to collect refuse and recyclable material. b. Provide a recyclables collection area that serves the entire building or project. The space should allow for the separation, collection and storage of paper, glass, plastic, metals, yard waste and other materials as needed. 	<p>In compliance with the City’s Refuse and Recyclable Material Storage Ordinance in the SDMC, the project would provide dedicated areas for the collection of refuse and recyclable materials and would ensure a collection service be provided for project operation. Therefore, the project would comply with Policy CE-A.10.</p>	<p>Yes</p>

**Table 5.1-1
 CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<p><i>Policy CE-A.11.</i> Implement sustainable landscape design and maintenance.</p> <ul style="list-style-type: none"> a. Use integrated pest management techniques, where feasible, to delay, reduce, or eliminate dependence on the use of pesticides, herbicides, and synthetic fertilizers. c. Encourage composting efforts through education, incentives, and other activities. Decrease the amount of impervious surfaces in developments, especially where public places, plazas, and amenities are proposed to serve as recreation opportunities (see also Recreation Element, Policies RE-A.6 and A.7). d. Strategically plant deciduous shade trees, evergreen trees, and drought tolerant native vegetation, as appropriate, to contribute to sustainable development goals. e. Reduce use of lawn types that require high levels of irrigation. f. Strive to incorporate existing mature trees and native vegetation into site designs. g. Minimize the use of landscape equipment powered by fossil fuels. h. Implement water conservation measures in site/building design and landscaping. i. Encourage the use of high-efficiency irrigation technology, and recycled site water to reduce the use of potable water for irrigation. Use recycled water to meet the needs of development projects to the maximum extent feasible (see Policy CE-A.12). 	<p>With regard to Policy CE-A.11, all landscape and irrigation would conform to the standards set forth in the Landscape Regulations of the LDC and Landscape Standards Manual and other applicable City and regional standards. Landscaping would include water conservation measures through irrigation management (e.g., use of pressure/moisture sensors and shut-off valves).</p> <p>The proposed landscape plan (see Section 3.2.3) features the use of native/naturalized and/or drought-tolerant plant material, whenever possible. No invasive or potentially invasive species would be used. In general, the landscape improvements along College Avenue would create a 14- to 16-foot-wide parkway featuring a 12-foot-wide shared sidewalk and street side canopy plantings and ground covers from the property line north to the private driveway. North of the private driveway, a 10 to 12-foot-wide parkway would be installed consisting of street side canopy plantings and a 5-foot-wide sidewalk. Entry monumentation and landscape treatments would be installed on site at the southeast corner near the driveway entrance.</p> <p>Plant material would be used throughout the site to help define spaces, encourage circulation paths, highlight entry points, and screen retaining walls. On site landscaping would include canopy trees and raised box plantings on the upper deck of the parking structure and in the parking areas, accent planting zones and graded slope plantings. In addition, plant material would be placed within the three stormwater biofiltration basins to provide stormwater management by collecting and treating runoff prior to its release off site. These landscaping features would be in conformance with Policy CE-A.11.</p>	<p>Yes</p>

**Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<p><i>Policy CE-A.12.</i> Reduce the San Diego Urban Heat Island, through actions such as:</p> <ul style="list-style-type: none"> a. Using cool roofing materials, such as reflective, low heat retention tiles, membranes and coatings, or vegetated eco-roofs to reduce heat build-up; b. Planting trees and other vegetation, to provide shade and cool air temperatures. In particular, properly position trees to shade buildings, air conditioning units, and parking lots; and c. Reducing heat build-up in parking lots through increased shading or use of cool paving materials as feasible (see also Urban Design Element, Policy UD-A.12). 	<p>The project includes design features to minimize potential “urban heat island effects,” including the use of light-colored roofs and paving materials of concrete or masonry pavers and provision of tree-lined, shaded streets. Covered walkways and building overhangs would provide shade in these pedestrian use areas. Implementation of these project design features as part of the approved exhibits would be in conformance with Policy CE-A.12.</p>	<p>Yes</p>
<p><i>Urban Runoff Management Goals</i></p>		
<p>Protection and restoration of water bodies, including reservoirs, coastal waters, creeks, bays, and wetlands; and preservation of natural attributes of both the floodplain and floodway without endangering life and property.</p> <p><i>Policy CE-E.2.</i> Apply water quality protection measures to land development projects early in the process-during project design, permitting, construction, and operations-in order to minimize the quantity of runoff generated on-site, the disruption of natural water flows and the contamination of stormwater runoff.</p> <ul style="list-style-type: none"> a. Increase on-site infiltration, and preserve, restore or incorporate natural drainage systems into site design. b. Direct concentrated drainage flows away from the MHPA and open space areas. If not possible, drainage should be directed into sedimentation basins, grassy swales or mechanical trapping devices prior to draining into the MHPA or open space areas. c. Reduce the amount of impervious surfaces through selection of materials, site planning, and street design where possible. 	<p>To compensate for a minor increase in runoff and comply with the current municipal separate storm sewer system (MS-4) permit and City’s Stormwater Manual, the project includes flow-through biofiltration planters to collect and treat runoff before it is discharged to the off-site stormwater system. As discussed in Section 7.1.7, <i>Hydrology</i>, and Section 7.1.14, <i>Water Quality</i>, the project would comply with drainage and water quality requirements, including those of the City and Regional Water Quality Control Board. Compliance with the water quality standards is ensured through permit conditions provided by Land Development Review (LDR) Engineering. Implementation of the recommendations in the project’s Preliminary Drainage Report (Appendix H) and Preliminary Stormwater Quality Management Plan (Appendix I) would be in conformance with Policies CE-E.2, CE-E.3, and CE-E.6.</p>	<p>Yes</p>

**Table 5.1-1
 CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<p>d. Increase the use of vegetation in drainage design.</p> <p>e. Maintain landscape design standards that minimize the use of pesticides and herbicides.</p> <p>f. Avoid development of areas particularly susceptible to erosion and sediment loss (e.g., steep slopes) and, where impacts are unavoidable, enforce regulations that minimize their impacts.</p> <p>g. Apply land use, site development, and zoning regulations that limit impacts on, and protect the natural integrity of topography, drainage systems, and water bodies.</p> <p>h. Enforce maintenance requirements in development permit conditions.</p> <p><i>Policy CE-E.3.</i> Require contractors to comply with accepted stormwater pollution prevention planning practices for all projects.</p> <p>a. Minimize the amount of graded land surface exposed to erosion and enforce erosion control ordinances.</p> <p>b. Continue routine inspection practices to check for proper erosion control methods and housekeeping practices during construction.</p> <p><i>Policy CE-E.6.</i> Continue to encourage "Pollution Control" measures to promote the proper collection and disposal of pollutants at the source, rather than allowing them to enter the storm drain system.</p> <p>a. Promote the provision of used oil recycling and/or hazardous waste recycling facilities and drop-off locations.</p> <p>b. Review plans for new development and redevelopment for connections to the storm drain system.</p> <p>c. Follow up on complaints of illegal discharges and accidental spills to storm drains, waterways, and canyons.</p>		

**Table 5.1-1
CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
<i>Sustainable Energy Goal</i>		
<p>An increase in local energy independence through conservation, efficient community design, reduced consumption, and efficient production and development of energy supplies that are diverse, efficient, environmentally-sound, sustainable, and reliable.</p> <p><i>Policy CE-I.4.</i> Maintain and promote water conservation and waste diversion programs to conserve energy.</p>	<p>The project would adhere to CBC and CAP requirements for water-conserving plumbing. All landscape and irrigation would conform to the Landscape Regulations and Landscape Standards of the LDC and other applicable City and regional standards.</p> <p>Drought-tolerant plant materials would be incorporated into the landscape plan. Irrigation systems for all landscaped areas would use controllers that respond to local climactic conditions and monitor potential breakages to prevent wasted water. Therefore, the project would be consistent with Policy CE-1.4.</p>	Yes
<i>Urban Forestry Goal</i>		
<p>Protection and expansion of a sustainable urban forest.</p> <p><i>Policy CE-J.4.</i> Continue to require the planting of trees through the development permit process.</p> <p>a. Consider tree planting as mitigation for air pollution emissions, stormwater runoff, and other environmental impacts as appropriate.</p>	<p>The project includes landscaping that would expand “urban forest” goals through the provision of various tree types that would be maintained through maturity, consistent with Policy CE-J.4.</p>	Yes

**Table 5.1-1
 CITY OF SAN DIEGO GENERAL PLAN LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
Noise Element		
Noise and Land Use Compatibility Goal		
<p>Consider existing and future noise levels when making land use planning decisions to minimize people’s exposure to excessive noise.</p> <p><i>Policy NE-A.2.</i> Assure the appropriateness of proposed developments relative to existing and future noise levels by consulting the guidelines for noise-compatible land use (shown on Table NE-3) to minimize the effects on noise-sensitive land uses.</p> <p><i>Policy NE-A.4.</i> Require an acoustical study consistent with Acoustical Study Guidelines (Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the “compatible” noise level thresholds as indicated on the Land Use – Noise Compatibility Guidelines (Table NE-3), so that noise mitigation measures.</p> <p><i>Policy NE-A.5.</i> Prepare noise studies to address existing and future noise levels from noise sources that are specific to a community when updating community plans.</p>	<p>A noise study was conducted on the project, the results of which are presented in Section 5.4, <i>Noise</i>, and in this section under Issue 5. No land use-noise compatibility issues were identified. The project would be consistent with Policies NE-A.2 and NE-A.4.</p>	<p>Yes</p>
<p><i>Policy NE-B.1.</i> Encourage noise-compatible land uses and site planning adjoining existing and future highways and freeways.</p> <p><i>Policy NE-B.2.</i> Consider traffic calming design, traffic control measures, and low-noise pavement surfaces that minimize motor vehicle traffic noise.</p> <p><i>Policy NE-B.3.</i> Require noise reducing site design, and/or traffic control measures for new development in areas of high noise to ensure that the mitigated levels meet acceptable decibel limits.</p>	<p>As addressed in this section under Issue 5 and in Section 5.4, <i>Noise</i>, the project would not result in the exposure of people to current or future transportation noise levels that exceed City significance standards. Less-than-significant noise impacts from the operation of the parking structure and surface parking would occur. The project would be consistent with Policies NE-B.1 through NE-B.3.</p>	<p>Yes</p>

**Table 5.1-2
NAVAJO COMMUNITY PLAN GOALS AND RECOMMENDATIONS CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
Principal Objective		
<p>Maintain and Enhance the Quality of Existing Residences and Encourage the Development of a Variety of New Housing Types with Dwelling Unit Densities Primarily in the Low to Low-Medium Density Range as shown.</p>	<p>The project would involve the construction of a non-residential use on a residentially designated site. It does not propose new housing. The site and architectural design incorporate careful planning and sensitive development features which create a well-defined, balanced and visually coherent design that would maintain the quality of the surrounding residential neighborhood. The project would be consistent with this objective from the Community Plan.</p>	<p>Yes</p>
Residential Element		
<p>Promote a healthy environment by careful planning and sensitive development of well-defined, balanced and distinct communities which encompass a variety of residential density patterns and housing types.</p>	<p>The project would involve the construction of a non-residential use on a residentially designated site. The site and architectural design incorporate careful planning and sensitive development features which create a well-defined, balanced and visually compatible design that would maintain the quality of the surrounding residential neighborhood. Since the proposed church would not be inconsistent with the character of the neighborhood, as described in Section 5.5, <i>Visual Effects and Neighborhood Character</i>, the project would be consistent with this goal of the Community Plan.</p>	<p>Yes</p>
<p>Foster techniques of land development that will encourage imagination and variety in building site layouts, housing types, and costs, and that will capitalize on the unique topographic assets of the community. All housing developments within the study area should relate to existing topography in order to minimize grading and preserve the natural terrain of the area. The use of retaining walls, terraces, split level or cantilevered houses should be considered in steep terrain.</p>	<p>The proposed church/sanctuary structure would be situated in the topographic low point of the site near the College Avenue off-ramp from I-8 and setback from the adjacent, lower stature residential and commercial structures to the east and north, as shown in cross-sections contained in Chapter 3, <i>Project Description</i>, and Section 5.5, <i>Visual Effects and Neighborhood Character</i>. The parking structure would be recessed into the terrain such that its upper parking deck would be slightly below College Avenue and the surface parking lot would meet surrounding grades. The building placement and setbacks defined in the project site plan would suppress the proposed structures. Landscaping, such as trees and vining species in raised planter beds, would be installed throughout the property, including the upper parking deck and</p>	<p>Yes</p>

**Table 5.1-2
 NAVAJO COMMUNITY PLAN GOALS AND RECOMMENDATIONS CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
	<p>along the façade of the parking structure, to soften and screen views. In addition, planting areas, with densely spaced trees and shrubs would be provided between parking areas and site perimeters to further soften views of the project. Therefore, the proposed grading, siting, landscaping, building articulation, roof treatments and other architectural design features would collectively provide visual interest and break up the massing of the structures such that the project would be consistent with this goal from the Community Plan.</p>	
<p>Encourage the design of residential areas so as to prevent the encroachment of incompatible uses and minimize conflict (e.g., traffic noise) with more intensive nonresidential uses.</p>	<p>The proposed church/sanctuary and associated parking facilities have been sited to take advantage of the topographic differences that currently exist on site by placing the most intensive activities associated with the daily operations in the southwestern corner of the property in the lowest topographic area of the site below the adjacent residences to minimize the potential for noise. Primary vehicular access to the project and the parking structure would be via a full access driveway connected to a new signalized intersection along College Avenue to minimize traffic conflicts. Architectural articulation and features (i.e., arches) have been integrated into the design to provide visual interest. Extensive landscaping, including screening along the common property line with the nearby residential yards, is proposed to conceal and soften views of facilities, walls and rooftops, as described in Section 5.5, <i>Visual Effects and Neighborhood Character</i>. The project design is consistent with this policy.</p>	<p>Yes</p>

**Table 5.1-2
NAVAJO COMMUNITY PLAN GOALS AND RECOMMENDATIONS CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
<p>Within each new development and where possible in developed areas, plazas, squares, and other similar open space areas should be created. Emphasis should be placed on developing interconnected bikeways and walkways separated from auto traffic as part of the internal circulation system within the study area.</p>	<p>The proposed church/sanctuary would include an entry plaza, architectural design features and landscape treatments that would produce a positive visual appearance from public vantage points that surround the site. Primary vehicular access to the project and the parking structure would be via a full access driveway connected to a new signalized intersection along College Avenue. Off-site improvements to the new College Avenue intersection would include creating a break and narrowing of the existing raised median, constructing a new southbound left-turn lane, striping a northbound right-turn lane and installing a crosswalk. The private driveway connection at College Avenue would descend to an entry plaza between the parking structure and the church/sanctuary building. A second right turn in/out driveway would be installed at the northern project boundary. These project features would be consistent with this goal.</p>	<p>Yes</p>
<p>Parking and storage areas should be screened from the street and other public areas.</p>	<p>The site plan and landscape plan in Chapter 3, <i>Project Description</i>, and visual simulations in Section 5.5, <i>Visual Effects and Neighborhood Character</i>, show that the parking areas would be heavily screened from public vantage points along College Avenue. These project features would be consistent with the goal.</p>	<p>Yes</p>
<p>Adequate off-street parking and storage must be provided and screened from living areas and public areas. Street trees and drought tolerant landscaping should be used in level terrain to add interest to hide parking and to separate functions. Non-contiguous sidewalks must be provided even around off-street parking and storage areas.</p>	<p>The project would exceed the parking requirements in the SDMC, as described in Chapter 3, <i>Project Description</i>. The site plan and landscape plan in Chapter 3, <i>Project Description</i>, and visual simulations in Section 5.5, <i>Visual Effects and Neighborhood Character</i>, show that the parking areas would be heavily screened from public vantage points along College Avenue. A landscaped parkway and non-contiguous sidewalk would be installed along College Avenue along the project frontage. All storage areas would be either in the parking structure or concealed from view. These project features would be consistent with the goal.</p>	<p>Yes</p>

**Table 5.1-2
 NAVAJO COMMUNITY PLAN GOALS AND RECOMMENDATIONS CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
<p>[Residential] Site Design If earth moving is necessary, re-contour rather than cut and fill. If a new form must be given to the land, the final form should have a strong, smoothly flowing character typical of the existing hills. The basic character of the original site should provide the theme with adjustments to make the slopes gentle. Particular attention should be paid to the transition areas where the existing terrain stops and earthwork begins. Additional shaping in some areas may be necessary due to the unique subsoil and groundwater conditions present.</p>	<p>The project proposes both cut and fill grading to stabilize the unconsolidated fill from previous site grading, to create usable building pads and parking areas, and to recess the parking structure into the terrain. Grading transitions that match the existing sloping terrain would be constructed where the project interfaces with off-site slopes. The basic character of the site, which has the lowest elevations in the south and highest elevations in the north, would be retained upon project implementation as shown in the project grading plan (refer to Figure 3-7 in Chapter 3). The project would be consistent with the goal.</p>	<p>Yes</p>
<p>Imaginative and innovative building techniques should be encouraged to create buildings</p>	<p>The church/sanctuary building is designed in a contemporary Spanish Colonial Revival-style theme featuring arched entrances and windows along its painted concrete tilt-up facades, with accents of wood fascia and terra-cotta-colored tile roofing materials. The glazing for each window would be tinted bronze in color. The proposed grading, siting, landscaping, building articulation, roof treatments and other architectural design features would collectively provide visual interest. The project would be consistent with the policy.</p>	<p>Yes</p>
<p>Residential Street Design Provide the maximum street tree planting. One principal characteristic of memorable streets throughout the world is their tree planting. The finest examples have mature specimens that arch across the street creating a green canopy. From an urban design standpoint, a various tree planting program is the most important single thing that the City can do. Trees should be spaced close enough together to create an effect of enclosure and to provide protection of trees from hot drying winds and sun scald.</p>	<p>Landscape improvements along College Avenue would remove the existing contiguous sidewalk and create a 10- to 16-foot-wide landscaped parkway with non-contiguous sidewalk featuring street side canopy plantings and ground covers. The project design would exceed the landscape requirements in the SDMC, as described in Chapter 3, <i>Project Description</i>. The project would be consistent with the policy.</p>	<p>Yes</p>

**Table 5.1-2
NAVAJO COMMUNITY PLAN GOALS AND RECOMMENDATIONS CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
Community Environment		
<p>Encourage an overall quality of design by using materials, color and texture to give identity and focus to groups of structures within the urban landscape.</p>	<p>The church/sanctuary and parking structure have been designed using similar architectural styling, building materials and colors, as well as landscaping, to create a comprehensively designed project, consistent with this policy.</p>	<p>Yes</p>
<p><u>Buildings – Structures</u></p> <ul style="list-style-type: none"> • Create, through design, harmony between natural features and urbanized areas and activities. • Encourage an orderly transition of height, density, scale and arrangement of buildings to preserve the identity of each element as well as the cohesion of the whole. • Promote the coordination of building groupings to foster neighborhood and community identity and unity. • Encourage an overall quality of design by using materials, color and texture to give identity and focus to groups of structures within the urban landscape. • Develop points of visual relief in the urban landscape through the use of open spaces and landscaping, building setbacks, building materials, location of public facilities, and street and right-of-way design and maintenance. 	<p>The project incorporates architectural design features and landscape treatments that complement the surrounding natural and urban setting. The proposed grading, siting, landscaping, building articulation, roof treatments and other architectural design features would collectively create design harmony with and transitions between the project and its surroundings and create visual interest by breaking up the massing of the structures such that the project would not exceed the bulk and scale of existing patterns of development by a substantial margin, as detailed in Section 5.5, <i>Visual Effects and Neighborhood Character</i>. The architectural materials, color and texture would create a comprehensive design theme anchored in contemporary Spanish Colonial Revival styling. Visual relief would be provided through the use of enhanced landscape treatments around the perimeter of the property, including along College Avenue. Refer to the visual simulations in Section 5.5 for images illustrating the features of the project. The project features would be consistent with this goal from the Community Plan.</p>	<p>Yes</p>

**Table 5.1-2
 NAVAJO COMMUNITY PLAN GOALS AND RECOMMENDATIONS CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
<p><u>Landscaping</u></p> <ul style="list-style-type: none"> • Use trees and shrubbery along heavily traveled streets to help lessen effects of traffic noise. • Establish financing programs, such as assessment districts, to provide for and maintain landscaping in the public right-of-way for major streets within the community. • The following streets should receive first priority for such right-of-way improvements: Navajo Road, Mission Gorge Road, College Avenue and Waring Road. These improvements should include the planting of street trees as well as landscaping of the center median. 	<p>Landscape improvements along College Avenue would remove the existing contiguous sidewalk and create a 10- to 16-foot-wide landscaped parkway with non-contiguous sidewalk featuring street side canopy trees and ground covers. The project would install 32 new street trees within the College Avenue right-of-way where none currently exist. Refer to Figure 3-6 and the visual simulations in Section 5.5, <i>Visual Effects and Neighborhood Character</i>.</p>	<p>Yes</p>
<p><u>Natural</u></p> <ul style="list-style-type: none"> • Utilize natural elements as points of visual relief in the urbanized areas. • Establish and maintain an open space system to conserve natural resources, preserve scenic beauty, and define urban form. • Create and preserve open space in and around built-up areas to aid in lessening the effects of high noise levels. • Strengthen environmental pollution control measures. Support research into causes and prevention of environmental pollution. • Prevent deterioration of natural watershed areas. 	<p>As discussed in Section 5.5, <i>Visual Effects and Neighborhood Character</i>, the project would result in a less-than-significant impact related to visual and scenic resources. There are no view corridors designated in the Community Plan in the project area. The site is designated and zoned for residential development and is not designated for open space or preservation. The project would have less-than-significant operational noise impacts on the community, as discussed in Section 5.4, <i>Noise</i>. No deterioration of the natural watershed would occur due to the installation of best management practices (BMPs), such as biofiltration basins, that would detain and treat all runoff occurring on the project site. The project would be consistent with this goal.</p>	<p>Yes</p>

**Table 5.1-2
NAVAJO COMMUNITY PLAN GOALS AND RECOMMENDATIONS CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
Circulation Element		
<p>Develop a balanced transportation system that adequately links the Navajo area to nearby communities as well as regional facilities.</p>	<p>According to the Local Mobility Analysis (Appendix J) prepared for the project, with the proposed traffic signal, median changes, sidewalk and bike lane improvements in place, project traffic would not result in a conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, as discussed in Section 7.1.12, <i>Transportation</i>. The project would be consistent with this goal.</p>	<p>Yes</p>
<p>Strive to separate automobile, pedestrian and bicycle conflicts and, where safe and practical, provide specially designated bikeways to accommodate the increased demand for this mode of travel.</p>	<p>To separate the pedestrian and bicycle movements from vehicular travel lanes along the project’s College Avenue frontage, a 12-foot shared (i.e., pedestrians and bicycles) contiguous sidewalk would be installed south of the project driveway toward the I-8 interchange, while north of the project driveway a 10- to 12-foot-wide parkway would be installed, consisting of street side canopy, shade-producing street trees and a 5-foot-wide sidewalk. Stairs and a ramp would be extended on-site from the sidewalks to link College Avenue to the church/sanctuary building and entry plaza. Bike lane signage and striping would be installed along the east side of College Avenue to accommodate multi-modal traffic. The project would be consistent with this goal.</p>	<p>Yes</p>
<p>Widening and realignment frequently destroys the visual character and identity of streets by the removal of mature trees, other landscaping, and median strips. The approach to street widening and realignment should be more sensitive to the character of the street and the quality of adjacent development.</p> <p>A coordinated system of variation in the use and placement of street trees, lighting, and other details could give streets better visual continuity and provide differentiation between through streets and local streets to aid driver orientation and traffic flow. The variations could include size, spacing and species of street trees and other landscaping, and intensity, spacing, and design of lighting fixtures.</p>	<p>The project would not widen or realign College Avenue. Instead, it would create parkways and a short median break and narrowing of the existing raised median to construct a new southbound left-turn lane at the project driveway. Landscape improvements along College Avenue would also remove the existing contiguous sidewalk and create a 10- to 16-foot-wide landscaped parkway with non-contiguous sidewalk featuring street side canopy trees and ground covers north and south of the project entrance. Consistent with this policy, no street trees would be removed, and 32 new street trees would be installed within the College Avenue right-of-way where none currently exist. As described in Chapter 3, <i>Project Description</i>, plant material would be used throughout the site to</p>	<p>Yes</p>

**Table 5.1-2
 NAVAJO COMMUNITY PLAN GOALS AND RECOMMENDATIONS CONSISTENCY EVALUATION**

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
<p>For example, major streets might have tall, widely spaced street trees; bright, closely spaced street lights; and large street signs. Design walkways and parking facilities to minimize danger to pedestrians. Pedestrian walkways should be sharply separated from traffic areas and set apart where possible to provide a separate circulation system. Where necessary and practical, the separation should include landscaping and other barriers.</p> <p>Both public and private efforts in the installation and maintenance of landscaping should be increased. In residential areas, side yards and setbacks provide the best opportunities for landscaping visible in public areas. If no such space exists, then trees should be placed in the sidewalk area, preferably in the ground rather than in containers. Care should be taken to select species of trees suitable to each location.</p>	<p>help define spaces, encourage circulation paths, highlight entry points, provide visual relief, and screen retaining walls and off-site properties. On-site landscaping would include canopy shade trees and raised box plantings on the upper deck of the parking structure, shade-producing trees in the parking areas, accent planting zones featuring palms and focal point species, and ground cover, shrubs and trees would be used for slope plantings. The landscape plans illustrated in Figure 3-6 of this report would comply with the City's Landscape Design Manual and enhance the streetscape, improve safety for pedestrians and bicycles, and soften views into the property. The project would be consistent with this goal.</p>	

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5.2 Biological Resources

This section of the Environmental Impact Report (EIR) is based on a number of biological surveys and related investigations including the Biological Technical Report (Alden Environmental Inc. 2020) contained in **Appendix C, Biological Technical Report**, to this EIR.

5.2.1 Existing Conditions

5.2.1.1 Vegetation Communities/Land Cover Types

Six upland vegetation communities occur on the project site (**Figure 5.2-1, Vegetation and Sensitive Species/Impacts**). **Table 5.2-1, Existing Vegetation Communities/Land Cover Types**, presents a list of these communities/types and their respective acreage totals. There are no wetland or riparian communities present on the project site. One land cover type, developed, occurs in the off-site improvement area associated with the College Avenue intersection improvements and the off-site sewer connection through developed areas to its connection point with an existing sewer main in Marne Avenue.

**Table 5.2-1
 EXISTING VEGETATION COMMUNITIES/LAND COVER TYPES**

Vegetation Community/Land Cover Type ^a	On Site (acres) ^b
Upland	
Diegan coastal sage scrub (Tier II)	2.3
Diegan coastal sage scrub-disturbed (Tier II)	0.9
Non-native grassland (Tier IIIB)	0.8
Other Upland (Tier IV)	
Disturbed habitat	1.2
Eucalyptus woodland	0.3
Ornamental	0.6
No Tier Land Cover	
Developed	—
Total	6.0

Notes:

Totals reflects rounding.

^a Upland vegetation communities are divided into five tiers of sensitivity (the first includes the most sensitive, the fifth the least sensitive) based on rarity and ecological importance (City of San Diego 2018a). Tier I includes rare upland habitats. Tier II includes uncommon upland habitats. Tiers IIIA and IIIB include common upland habitats. Tier IV includes other upland habitats.

^b Off-site utility improvements related to the project are not included in the table but would occur within developed areas. No vegetation communities are present in the off-site improvement areas.

The following sections describe each vegetation community/land cover type on the project site. The acreages are provided along with the upland habitat tiers (City of San Diego 2018a), where

applicable. Upland vegetation communities are divided into five tiers of habitat sensitivity (the first includes the most sensitive, the fifth the least sensitive) based on rarity and ecological importance (City of San Diego 2018a). Tier I includes rare upland habitats. Tier II includes uncommon upland habitats. Tiers IIIA and IIIB include common upland habitats. Tier IV includes other upland habitats.

Diegan Coastal Sage Scrub (including -disturbed)

Coastal sage scrub is one of two major shrub types that occur in California. This community occupies xeric sites characterized by shallow soils. Coastal sage scrub is dominated by subshrubs whose leaves abscise during drought. This adaptation allows the plant species to better withstand the prolonged dry period in the summer and fall. Coastal sage scrub species have relatively shallow root systems and open canopies, which may allow for the occurrence of a substantial herbaceous component. Four floristic associations are recognized within the coastal sage scrub plant formation, and these occur in distinct geographic areas along the California coast with the Diegan association, which occurs on the project site, occupying the area from Orange County to northwestern coastal Baja California, Mexico (O'Leary 1990).

Diegan coastal sage scrub on the project site contains a diverse suite of plant species including California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), lemonadeberry (*Rhus integrifolia*), and laurel sumac (*Malosma laurina*). This community on site also supports small patches of mule fat (*Baccharis salicifolia*) in an entirely upland situation. Diegan coastal sage scrub-disturbed contains many of the same shrub species as the undisturbed community but is sparser, has a higher proportion of non-native species (principally non-native grasses), and shows signs of previous disturbance. Diegan coastal sage scrub (including -disturbed) is a Tier II (uncommon upland) habitat (City of San Diego 2018a). Approximately 3.2 acres of this community occurs on the project site.

Non-Native Grassland

Non-native grassland is comprised of a dense to sparse cover of non-native grasses, sometimes associated with species of showy-flowered, native, annual forbs (Holland 1986). This community characteristically occurs on gradual slopes with deep, fine-textured, usually clay soils. Characteristic species on the project site include oats (*Avena* spp.), filaree (*Erodium* spp.), red brome (*Bromus madritensis* ssp. *rubens*), and ripgut grass (*Bromus diandrus*). Most of the annual, introduced species that comprise the majority of species and biomass within non-native grassland originated from the Mediterranean region, an area with a long history of agriculture and a climate similar to California. These two factors, in addition to intensive grazing and agricultural practices in conjunction with droughts, contributed to the successful invasion and establishment of these species and the replacement of native grasses with annual-dominated, non-native grassland (Jackson 1985). Non-native grassland is a Tier IIIB (common upland) habitat (City of San Diego 2018a). Approximately 0.8 acres of non-native grassland occurs on the project site.

Disturbed Habitat

Disturbed habitat includes land cleared of vegetation, land containing a preponderance of non-native plant species, or land showing signs of past or present usage that removes its capability of providing viable wildlife habitat. Such areas include dirt roads, graded areas, and dump sites where

no native or naturalized species remain. Approximately 1.2 acres of disturbed habitat occurs on the project site. Disturbed habitat is a Tier IV (other upland) habitat (City of San Diego 2018a).

Eucalyptus Woodland

Eucalyptus woodland is dominated by eucalyptus (*Eucalyptus* spp.), an introduced genus that has been planted for wind blocking, ornamental, or hardwood production purposes. The understory within well-established groves is usually very sparse due to the closed canopy and allelopathic nature of the abundant leaf and bark litter. The sparse understory offers only limited wildlife habitat; however, as a wildlife habitat, these woodlands can provide nesting sites for raptors. During winter migrations, a variety of warblers may be found feeding on the insects that are attracted to the eucalyptus flowers. Approximately 0.3 acres of eucalyptus woodland occurs on the project site. Eucalyptus woodland is a Tier IV (other upland) habitat (City of San Diego 2018a).

Ornamental

Ornamental is where non-native landscaping has been planted. Ornamental landscaping occurs on approximately 0.6 acres of the project site and includes species such as pine (*Pinus* sp.) and pepper (*Schinus* spp.) trees. Ornamental is a Tier IV (other upland) habitat (City San Diego 2018a).

Developed

Developed land occurs in the off-site utility improvement areas, including within College Avenue and through developed areas to connect with the existing sewer main in Marne Avenue.

5.2.1.2 Jurisdictional Areas

Jurisdictional areas include waters of the U.S. under the jurisdiction of the U.S. Army Corps of Engineers, waters of the State under the jurisdiction of the California Department of Fish and Wildlife (CDFW), and City Wetlands. There are no jurisdictional areas on the project site.

5.2.1.3 Sensitive Vegetation Communities

Sensitive vegetation communities are considered rare within the region or sensitive by CDFW (Holland 1986) and/or the City (City of San Diego 2018a). These communities in any form (including, for example, -disturbed) are considered sensitive because they have been historically depleted, are naturally uncommon, or support sensitive species. The project site supports two sensitive vegetation communities: Diegan coastal sage scrub (including -disturbed; Tier II habitat) and non-native grassland (Tier IIIB habitat).

5.2.1.4 Sensitive Plant Species

Sensitive plant species are those that are federal, state, or California Native Plant Society (CNPS) rare, threatened, or endangered; Multiple Species Conservation Program (MSCP) Narrow Endemics; or MSCP-Covered Species. A species may also be considered sensitive if it is included in the CNPS Inventory of Rare and Endangered Plants.

Observed

Three sensitive plant species were observed on the project site (Figure 5.2-1). They include graceful tarplant (*Holocarpha virgata* ssp. *elongata*), San Diego County sunflower (*Bahiopsis laciniata*), and ashy spike-moss (*Selaginella cinerascens*), as described below. Sensitivity codes are explained in Appendix C of EIR Appendix C.

- Graceful tarplant (*Holocarpha virgata* ssp. *elongata*)
 - Sensitivity: CNPS Rare Plant Rank 4.2 (a CNPS watch list species)
 - Distribution: Orange, Riverside, and San Diego counties
 - Habitat(s): Chaparral, valley grassland, foothill woodland, coastal sage scrub
 - Presence on site: Scattered individuals were found within non-native grassland on the project site
- San Diego County sunflower (*Bahiopsis laciniata*)
 - Sensitivity: CNPS Rare Plant Rank 4.2 (a CNPS watch list species)
 - Distribution: San Diego and Orange counties; Baja California, Mexico.
 - Habitat(s): Diegan coastal sage scrub is the habitat of this perennial shrub
 - Presence on site: Eight individuals of this species were found in Diegan coastal sage scrub-disturbed on the project site.
- Ashy spike moss (*Selaginella cinerascens*)
 - Sensitivity: CNPS Rare Plant Rank 4.1 (a CNPS watch list species)
 - Distribution: Orange and San Diego counties; northwestern Baja California, Mexico.
 - Habitat(s): Open areas on flat mesas in coastal sage scrub and chaparral
 - Presence on site: A small patch of this species was found in Diegan coastal sage scrub on the project site

Not Observed

Sensitive plant species that were not observed but that may have potential to occur on the project site are listed in **Table 5.2-2, Sensitive Plant Species and Their Potential to Occur**. **Table 5.2-3, MSCP Narrow Endemic Plant Species Potential to Occur**, specifically addresses the potential for all City Narrow Endemic plant species to occur on the project site.

**Table 5.2-2
 SENSITIVE PLANT SPECIES AND THEIR POTENTIAL TO OCCUR**

Species	Listing or Sensitivity:^a Federal/State CNPS City	Habitat(s)	Bloom Period	Potential to Occur
California adolphia (<i>Adolphia californica</i>)	—/— CNPS Rare Plant Rank 2B.1 —	Occurs in chaparral, valley grassland, and coastal sage scrub in Los Angeles and San Diego counties.	December to May	None. A perennial shrub that would have been observed if present.
San Diego goldenstar (<i>Bloomeria clevelandii</i>)	—/— CNPS Rare Plant Rank 1B.1 Covered Species	Found on clay soils in chaparral, coastal scrub, vernal pools, and valley and foothill grassland in Riverside and San Diego counties.	April to May	Very low. Suitable habitat and soils not present.
Palmer's goldenbush (<i>Ericameria palmeri</i> var. <i>palmeri</i>)	—/— CNPS Rare Plant Rank 1B.1 Covered Species	Associated with coastal sage scrub and chaparral habitats.	September to November	None. A perennial, evergreen shrub that would have been observed if present.
San Diego barrel cactus (<i>Ferocactus viridescens</i>)	—/— CNPS Rare Plant Rank 2B.1 Covered Species	Associated with coastal sage scrub and chaparral habitats.	May to June	None. A perennial stem succulent that would have been observed if present.
Robinson's pepper-grass (<i>Lepidium virginicum</i> var. <i>robinsonii</i>)	—/— CNPS Rare Plant Rank 4.3 —	Associated with coastal sage scrub and chaparral habitats.	January to July	Low. Survey was conducted at the middle of the bloom period; therefore, it is expected it would have been found if present.
Golden-rayed pentachaeta (<i>Pentachaeta aurea</i> ssp. <i>aurea</i>)	—/— CNPS Rare Plant Rank 4.2 —	Found in mesic montane grasslands and sage scrub in Riverside, San Bernardino, Orange, Los Angeles, and San Diego counties; Baja California, Mexico.	March to July	Low. Survey was conducted during the bloom period; therefore, it is expected it would have been found if present.

Table 5.2-2
SENSITIVE PLANT SPECIES AND THEIR POTENTIAL TO OCCUR

Species	Listing or Sensitivity:^a Federal/State CNPS City	Habitat(s)	Bloom Period	Potential to Occur
Purple stemodia (<i>Stemodia durantifolia</i>)	—/— CNPS Rare Plant Rank 2B.1 —	Associated with wetland/riparian habitats.	January to December	None. Suitable habitat not present.
Oil neststraw (<i>Stylocline citroleum</i>)	—/— CNPS Rare Plant Rank 1B.1 —	Associated with coastal sage scrub, chenopod scrub, and grasslands in clay soils.	March to April	Very low. Soils on site not suitable.

Source: Alden Environmental 2020

Note:

^a See Appendix C of EIR Appendix C for an explanation of listing or sensitivity codes.

**TABLE 5.2-3
 MSCP NARROW ENDEMIC PLANT SPECIES POTENTIAL TO OCCUR**

Species	Listing or Sensitivity: ^a Federal/State CNPS	Habitat(s)	Bloom Period	Potential to Occur
San Diego thornmint (<i>Acanthomintha ilicifolia</i>)	FT/SE CNPS Rare Plant Rank 1B.1	Occurs on clay lenses in grassy openings in chaparral or sage scrub. Prefers friable or broken, clay soils. Range limited to coastal areas of San Diego County and Baja California, Mexico.	April to June	Very low. Soils not suitable.
Shaw's agave (<i>Agave shawii</i>)	—/— CNPS Rare Plant Rank 2B.1	Occurs in coastal sage scrub and coastal bluff scrub. Range limited to coastal areas of San Diego County and Baja California, Mexico.	September to May	Very low. A perennial leaf succulent that would have been observed if present.
San Diego ambrosia (<i>Ambrosia pumila</i>)	FE/— CNPS Rare Plant Rank 1B.1	Found in disturbed areas within chaparral, coastal sage scrub, and grasslands. Range includes San Diego and Riverside counties south to Baja California, Mexico.	June to September	Very low. Not known from project vicinity.
Aphanisma (<i>Aphanisma blitoides</i>)	—/— CNPS Rare Plant Rank 1B.2	Occurs in sandy areas along the coast. Range includes islands off the southern California coast from San Onofre to Imperial Beach in San Diego County.	April to May	Very low. No known populations in MSCP Plan Area.
Coastal dunes milk-vetch (<i>Astragalus tener</i> var. <i>titi</i>)	FE/SE CNPS Rare Plant Rank 1B.1	Occurs in sandy places along the coast, including coastal dunes. Range includes coastal areas of Monterey, Los Angeles, and San Diego counties.	March to May	Very low. Occurs on coastal dunes, and range does not include the project area.
Snake cholla (<i>Cylindropuntia californica</i> var. <i>californica</i>)	—/— CNPS Rare Plant Rank 1B.1	Found in open patches in coastal sage scrub, primarily in southern portion of San Diego County and in Florida Canyon.	April to June	Very low. A perennial stem succulent that would have been observed if present.
Otay tarplant (<i>Deinandra conjugens</i>)	FT/SE CNPS Rare Plant Rank 1B.1	Occurs in disturbed areas and patches of coastal sage scrub in the Otay Mesa area.	June to August	Very low. Occurs on Otay Mesa; not known from project vicinity.
Short-leaved dudleya (<i>Dudleya blochmaniae</i> ssp. <i>brevifolia</i>)	—/SE CNPS Rare Plant Rank 1B.1	Occurs on Torrey sandstone soils in chaparral and coastal scrub.	April	None. Suitable soils not present.

**TABLE 5.2-3
MSCP NARROW ENDEMIC PLANT SPECIES POTENTIAL TO OCCUR**

Species	Listing or Sensitivity: ^a Federal/State CNPS	Habitat(s)	Bloom Period	Potential to Occur
Variegated dudleya (<i>Dudleya variegata</i>)	—/— CNPS Rare Plant Rank 1B.2	Occurs on dry hillsides and mesas in chaparral, coastal sage scrub, grasslands, and near vernal pools. Ranges from San Diego County south to Baja California, Mexico.	May to June	Very low. Not known from project vicinity.
Spreading navarretia (<i>Navarretia fossalis</i>)	FT/— CNPS Rare Plant Rank 1B.1	Occurs in marshes and swamps (assorted freshwater habitats), playas, and vernal pools.	April to June	None. No suitable habitat present.
California Orcutt grass (<i>Orcuttia californica</i>)	FT/SE CNPS Rare Plant Rank 1B.1	Occurs within and adjacent to vernal pools.	April to June	None. No suitable habitat present.
San Diego mesa mint (<i>Pogogyne abramsii</i>)	FE/SE CNPS Rare Plant Rank 1B.1	Occurs within and adjacent to vernal pools.	March to July	None. No suitable habitat present.
Otay Mesa mint (<i>Pogogyne nudiuscula</i>)	FE/SE CNPS Rare Plant Rank 1B.1	Occurs within and adjacent to vernal pools on Otay Mesa.	March to July	None. No suitable habitat present. Not known from project vicinity.

Source: Alden Environmental 2020

Note:

^a See Appendix C of EIR Appendix C for an explanation of listing or sensitivity codes.

5.2.1.5 Sensitive Animal Species

Sensitive animal species are those that are considered federal or State rare, threatened, or endangered or MSCP-Covered Species. It also includes species on CDFW's Special Animals List (CDFW 2019). Additionally, avian nesting is sensitive. Eight resident bird species were observed on the project site, and several have potential to nest there. Nesting birds are protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code.

Observed

One sensitive animal species, orange-throated whiptail (*Aspidoscelis hyperythra beldingi*), was observed on site (Figure 5.2-1). This species is described below:

- Orange-throated whiptail (*Aspidoscelis hyperythra beldingi*)
 - Sensitivity: State Species of Special Concern; MSCP Covered Species (See Appendix C of EIR Appendix C)
 - Distribution: Southern Orange and San Bernardino counties, south to the cape of Baja California, Mexico
 - Habitat(s): Coastal sage scrub, chaparral, edges of riparian woodlands and washes. Also found in weedy, disturbed areas adjacent to these habitats. Important habitat requirements include open, sunny areas, shaded areas, and abundant invertebrate prey base, particularly termites (*Reticulitermes* sp.).
 - Presence on site: This species was observed within Diegan coastal sage scrub/disturbed habitat on the project site

Not Observed or Detected

Sensitive animal species that were not observed or detected but that may have potential to occur on the project site are listed in **Table 5.2-4, Sensitive Animal Species and Their Potential to Occur**.

5.2.1.6 Wildlife Corridors and Nursery Sites

Wildlife corridors represent areas where wildlife movement is concentrated due to natural or anthropogenic constraints. Wildlife corridors can be local or regional in scale; their functions may vary temporally and spatially based on conditions and species presence. Local corridors provide access to resources such as food, water, and shelter. Animals use local corridors, which are often hillsides or tributary drainages, to move between different habitats. Regional corridors provide these functions but also link two or more large habitat areas. Regional corridors provide avenues for wildlife dispersal, migration, and contact between otherwise distinct populations. The project site is located in an urbanized area of the city and is not located within or adjacent to any wildlife corridor, including the Multi-Habitat Planning Area (MHPA).

A wildlife nursery site is a specific, established location often used repeatedly for breeding purposes, such as a heron rookery or bat maternal colony roost. No such wildlife nursery sites were observed, and due to the small size of the project site and its urbanized location, none is expected to occur.

**Table 5.2-4
SENSITIVE ANIMAL SPECIES AND THEIR POTENTIAL TO OCCUR**

Species	Listing or Sensitivity: ^a Federal/State City	Habitat(s)	Potential to Occur
INVERTEBRATES			
San Diego fairy shrimp (<i>Branchinecta sandiegonensis</i>)	FE/— VPHCP	Found in shallow vernal pools and ephemeral wetlands in southern coastal California and northern Baja California, Mexico.	None. No suitable habitat on site.
Quino checkerspot butterfly (<i>Euphydryas editha quino</i>)	FE/— —	The primary larval host plant of this species in San Diego is dwarf plantain (<i>Plantago erecta</i>). Owl's clover (<i>Castilleja exserta</i>) may serve as host plant if primary host plants have senesced. Potential habitat includes areas of low-growing and sparse vegetation. Exists only as several, probably isolated, colonies in southwestern Riverside County, southern San Diego County, and northern Baja California, Mexico.	Very low. Host plant not observed on site. Site is outside the recommended survey area for the species (U.S. Fish and Wildlife Service 2014).
Hermes copper butterfly (<i>Lycaena hermes</i>)	FC/— —	Occurs in southern mixed chaparral and coastal sage scrub with mature specimens of its larval host plant, spiny redberry (<i>Rhamnus crocea</i>). Range is San Diego County, south of Fallbrook, to northern Baja California, Mexico.	Very low due to project site's small size and location in an urban setting.
Salt marsh skipper (<i>Panoquina errans</i>)	—/— Covered Species	Found in coastal salt and brackish marshes, occasionally nearby fields and wood edges.	None. No suitable habitat on site.
Riverside fairy shrimp (<i>Streptocephalus woottoni</i>)	FE/— VPHCP	Found in moderate to deep (generally ranging from 10 inches to 5 to 10 feet in depth), longer-lived vernal pools and ephemeral wetlands in southern coastal California and northern Baja California, Mexico.	None. No suitable habitat on site.
VERTEBRATES			
Amphibians and Reptiles			
Silvery legless lizard (<i>Anniella pulchra pulchra</i>)	—/SSC —	Occurs in areas with loose, sandy soil. Generally found in leaf litter, under rocks, logs, or driftwood in oak woodland, chaparral, and desert scrub. Occurs from the Bay Area south through the Coast and Peninsular ranges to northern Baja California, Mexico.	Low due to site's small size and location in an urban setting.

**Table 5.2-4
 SENSITIVE ANIMAL SPECIES AND THEIR POTENTIAL TO OCCUR**

Species	Listing or Sensitivity: ^a Federal/State City	Habitat(s)	Potential to Occur
Arroyo toad (<i>Anaxyrus californicus</i>)	FE/SSC Covered Species	Found in washes, streams, and arroyos in semiarid areas. Prefer shallow pools and open, sandy stream terraces or sand bars with cottonwoods (<i>Populus</i> spp.), willows (<i>Salix</i> spp.), or sycamores (<i>Platanus</i> spp.). Breeds in shallow pools along stream edges with sand/gravel flats between March and June. Adults use sage scrub, mixed chaparral, and oak woodland habitats up to within 1 mile of breeding sites.	None. No suitable habitat on site.
Western pond turtle (<i>Emys marmorata</i>)	—/SSC Covered Species	Found in both permanent and intermittent waters, including marshes, streams, rivers, ponds, and lakes throughout Oregon, California, and Baja California, Mexico.	None. No suitable habitat on site.
Red-diamond rattlesnake (<i>Crotalus ruber</i>)	—/SSC —	Found in chaparral, coastal sage scrub, and along creek banks, particularly among rock outcrops or piles of debris supporting rodents. Ranges from extreme southeastern Los Angeles County (Diamond Bar) into southern San Bernardino County, and south into southern Baja California, Mexico.	Low due to site's small size and location in an urban setting.
Coast horned lizard (<i>Phrynosoma blainvillii</i>)	—/SSC Covered Species	Occurs in scrubland, grassland, coniferous woods, and broadleaf woodlands, typically in area with sandy soil, scattered shrubs, and native ant colonies.	Low due to the presence of Argentine ants that out-compete the species' native ant prey.
Coronado skink (<i>Plestiodon skiltonianus interparietalis</i>)	—/SSC —	Inhabits grasslands, coastal sage scrub, open chaparral, pine oak woodland and coniferous forests. Prefers areas where there is abundant leaf litter or low, herbaceous growth. Occurs in inland southern California south through the north Pacific coast region of northern Baja California Norte, Mexico.	Low due to site's small size and location in an urban setting.
Western spadefoot toad (<i>Spea hammondi</i>)	—/SSC —	Inhabits floodplains, washes, and low hills. Southern California habitats include coastal sage scrub, chaparral and grassland. Important habitat components include temporary pools (which form during winter and spring rains) for breeding and friable soils for burrowing.	None. No suitable habitat present.

**Table 5.2-4
SENSITIVE ANIMAL SPECIES AND THEIR POTENTIAL TO OCCUR**

Species	Listing or Sensitivity: ^a Federal/State City	Habitat(s)	Potential to Occur
Two-striped garter snake (<i>Thamnophis hammondi</i>)	—/SSC —	Found in permanent fresh water, inhabiting streams, ponds, and vernal pools. Occupies adjacent coastal sage scrub and grasslands during the winter.	None. No suitable habitat present.
Birds			
Cooper's hawk (<i>Accipiter cooperii</i>)	—/WL Covered Species	Occurs throughout the continental U.S. (excluding Alaska) and parts of both Montana and the Dakotas. Winters south to Mexico and Honduras. In San Diego County, tends to inhabit lowland riparian areas and oak woodlands in proximity to suitable foraging areas such as scrubland or fields. Unit (2004) noted, however, that in the 1980s Cooper's hawks began adapting to urban environments in San Diego County and nesting in eucalyptus trees and other urban trees.	Low potential to forage and nest on site due to the project site's location in an urban setting adjacent to College Avenue and Interstate 8 (I-8).
Tri-colored blackbird (<i>Agelaius tricolor</i>)	BCC/SC, SSC —	Occurs mostly in coastal lowland grasslands and wetlands, as well as freshwater marshes agricultural areas, lakeshores, parks.	None. No suitable habitat present.
Southern California rufous-crowned sparrow (<i>Aimophila ruficeps canescens</i>)	—/WL Covered Species	Inhabits coastal sage scrub and open chaparral as well as shrubby grasslands. Occur throughout the coastal lowlands and foothills of San Diego County.	Low due to project site's small size and location in an urban setting adjacent to College Avenue and I-8.
Grasshopper sparrow (<i>Ammodramus savannarum</i>)	—/SSC —	Open grasslands in the eastern U.S. and plains areas as well as coastal California. Typical habitat is dense grasslands that have little or no shrub cover.	Very low due to project site's small size and location in an urban setting adjacent to College Avenue and I-8.
Bell's sage sparrow (<i>Artemesiospiza belli belli</i>)	BCC/WL —	Found in chaparral and sage scrub with modest leaf litter. Patchy distribution throughout San Diego County, which often shifts to include partially recovered burned areas.	Low due to project site's small size and location in an urban setting adjacent to College Avenue and I-8.

**Table 5.2-4
 SENSITIVE ANIMAL SPECIES AND THEIR POTENTIAL TO OCCUR**

Species	Listing or Sensitivity: ^a Federal/State City	Habitat(s)	Potential to Occur
Golden eagle (<i>Aquila chrysaetos</i>)	BCC/FP, WL Covered Species	Requires vast foraging areas in grassland, broken chaparral, or sage scrub. Nest in cliffs and boulders.	None. Due to project site's small size and location in an urban setting. Golden eagles are sensitive to anthropogenic presence (Palmer 1988 in U.S. Fish and Wildlife Service 2010).
Burrowing owl (<i>Athene cunicularia</i>)	BCC/SSC Covered Species	Declining species occurring in grassland or open scrub habitats. In 2003, there were an estimated 25 to 30 resident pairs of in San Diego County located primarily in the southern quarter of the county and on North Island (Lincer and Bloom 2007).	Very low. Not known from project vicinity but is typically addressed at City request.
Ferruginous hawk (<i>Buteo regalis</i>)	BCC/WL —	Found in arid and semiarid regions of North America. Grasslands, rock outcrops, shallow canyons, and gullies may characterize some habitats.	None. Suitable habitat does not occur on site.
Coastal cactus wren (<i>Campylorhynchus brunneicapillus sandiegonensis</i>)	BCC/SSC Covered Species	Occurs in arid and semiarid regions from the southwestern U.S. to southern Mexico. Occurs in coastal sage scrub with large cacti for nesting.	Very low. No cacti suitable for nesting are present.
Western snowy plover (<i>Charadrius alexandrinus nivosus</i>)	FT/SSC Covered Species	Found on sandy coasts and in brackish inland lakes up the Pacific coastline. Utilizes sandy beaches, dried mudflats, and saltpans.	None. No suitable habitat present.
Northern harrier (<i>Circus cyaneus</i>)	—/SSC Covered Species	Utilizes coastal, salt, and freshwater marshlands; grasslands; and prairies. Widespread throughout the temperate regions of North America and Eurasia. Winters and migrates throughout California from below sea level in Death Valley to an elevation of 9,800 feet. Known breeding areas in San Diego County include Torrey Pines, the Tijuana River Valley, and Camp Pendleton.	Very low due to project site's small size and location in an urban setting adjacent to College Avenue and I-8.

**Table 5.2-4
SENSITIVE ANIMAL SPECIES AND THEIR POTENTIAL TO OCCUR**

Species	Listing or Sensitivity: ^a Federal/State City	Habitat(s)	Potential to Occur
White-tailed kite (<i>Elanus leucurus</i>)	—/FP —	Occurs in riparian woodlands and oak or sycamore groves and adjacent grasslands on coastal slopes in San Diego County. Nests in the crowns of trees, especially coast live oak (<i>Quercus agrifolia</i>).	None. Suitable habitat not present.
Southwestern willow flycatcher (<i>Empidonax traillii extimus</i>)	FE/SE Covered Species	This flycatcher typically breeds in patchy to dense, well-developed riparian woodlands along streams, rivers, lakes, or other wetlands, composed of native riparian species such as willows (<i>Salix</i> spp.) and mule fat.	None. No suitable habitat present.
California horned lark (<i>Eremophila alpestris actia</i>)	—/WL —	Inhabits sandy beaches, agricultural fields, grasslands and open areas on coastal slopes, and in lowlands from Sonoma County to northern Baja California, Mexico.	Low due to due to limited habitat and location in an urban setting adjacent to College Avenue and I-8.
American peregrine falcon (<i>Falco peregrinus</i>)	BCC/FP Covered Species	Found in coastal sage scrub and chaparral with rock outcrops. Ranges from San Luis Obispo south through Santa Barbara, Ventura, Los Angeles, San Bernardino, Riverside, Orange, and San Diego counties and into Baja California, Mexico.	Very low. Rare fall and winter visitor. Prefers various coastal habitats for foraging and breeding.
Loggerhead shrike (<i>Lanius ludovicianus</i>)	BCC/SSC —	Found in grassland, open sage scrub, chaparral, and desert scrub. Uncommon year-round resident observed in lower elevations of San Diego County.	Very low due to site's small size and location in an urban setting adjacent to College Avenue and I-8.
Long-billed curlew (<i>Numenius americanus</i>)	BCC/WL Covered Species	Occurs on tidal mudflats and open coastal grassland.	None. No suitable habitat present.
Coastal California gnatcatcher (<i>Polioptila californica californica</i>)	FT/SSC Covered Species	Occurs in coastal sage scrub and very open chaparral.	Low. Would likely have been observed if present.

**Table 5.2-4
 SENSITIVE ANIMAL SPECIES AND THEIR POTENTIAL TO OCCUR**

Species	Listing or Sensitivity: ^a Federal/State City	Habitat(s)	Potential to Occur
Ridgeway's rail (<i>Rallus obsoletus</i>) formerly light-footed clapper rail (<i>Rallus longirostris levipes</i>)	FE/SE, FP Covered Species	Occurs in the lower littoral zone of coastal salt marshes where cordgrass (<i>Spartina</i> sp.) is present; however, all marsh habitats and adjacent uplands are used to some extent.	None. No suitable habitat present.
California least tern (<i>Sterna antillarum browni</i>)	FE/SE, FP Covered Species	Occurs on open sand, salt pans, or dried mudflats near lagoons or estuaries along the coast	None. No suitable habitat present.
Least Bell's vireo (<i>Vireo bellii pusillus</i>)	FE/SE Covered Species	Occurs where there is dense, stratified canopy within willow-dominated woodland or scrub, baccharis scrub, mixed oak/willow woodland, mesquite woodland, or elderberry scrub in riparian habitat.	None. No suitable habitat present.
Mammals			
Dulzura pocket mouse (<i>Chaetodipus californicus femoralis</i>)	—/SSC —	Primarily associated with mature chaparral. It has, however, been trapped in mule fat scrub and is known to occur in coastal sage scrub. Has been reported from the mouth of the Santa Margarita River south into northern Baja California, Mexico. In San Diego County, it ranges eastward to the desert transition zone.	Low due to project site's small size and location in an urban setting.
Northwestern San Diego pocket mouse (<i>Chaetodipus fallax fallax</i>)	—/SSC —	Occurs in open areas of coastal sage scrub and weedy growth, often on sandy substrates. Ranges from Los Angeles County and southern San Bernardino County south into west-central Baja California, Mexico.	Low due to project site's small size and location in an urban setting.
Western mastiff bat (<i>Eumops perotis californicus</i>)	—/SSC —	Occurs in chaparral, coastal and desert scrub, coniferous and deciduous forest, and woodland habitats. Most roost sites are in crevices in cliffs.	Low to forage on project site; unlikely to roost due to the project site's small size, location in an urban setting, and absence of cliffs.

**Table 5.2-4
SENSITIVE ANIMAL SPECIES AND THEIR POTENTIAL TO OCCUR**

Species	Listing or Sensitivity: ^a Federal/State City	Habitat(s)	Potential to Occur
San Diego desert woodrat (<i>Neotoma lepida intermedia</i>)	—/SSC —	Occurs in open chaparral and coastal sage scrub, often building large, stick nests in rock outcrops or around clumps of cactus or yucca. Occurs along the coastal slope of southern California from San Luis Obispo County south into coastal northwestern Baja California, Mexico.	Low. Nests likely would have been observed if present.
Southern grasshopper mouse (<i>Onychomys torridus ramona</i>)	—/SSC —	Generally found in desert habitats with loose, friable soils.	Very low due to project site's small size and location in an urban setting.
Pacific pocket mouse (<i>Perognathus longimembris pacificus</i>)	FE/SSC —	Endemic to the immediate coast (within approximately 2.5 to 3.7 miles of the Pacific coast; Spencer 2005) of southern California from Marina del Rey and El Segundo in Los Angeles County, south to the vicinity of the Mexican border in San Diego County. Found in coastal sage scrub but more often in sandy washes.	None. Project site is too far inland. Known currently from one location in Orange County and three on Camp Pendleton. Project site is also outside of species' current range.
American badger (<i>Taxidea taxus</i>)	—/SSC Covered Species	Occurs in drier, open stages of shrub steppes, agricultural fields, open woodland forests, and large grass and sagebrush meadows and valleys with friable soils	None. Suitable habitat not present.

Source: Alden Environmental 2020

Note:

^a See Appendix C of EIR Appendix C for an explanation of listing or sensitivity codes.

5.2.2 Regulatory Framework

5.2.2.1 Federal

Migratory Bird Treaty Act

The MBTA (16 U.S. Code Sections 703-711) includes provisions for protection of migratory birds, including the non-permitted take of migratory birds. The MBTA regulates or prohibits taking, killing, possession of, or harm to migratory bird species listed in Title 50 Code of Federal Regulations Section 10.13. Migratory birds include geese, ducks, shorebirds, raptors, songbirds, and many others. Disturbance that causes nest abandonment and/or loss of reproductive effort (killing or abandonment of eggs or young) is considered a “take.” The MBTA is an international treaty for the conservation and management of bird species that migrate through more than one country and is enforced in the United States by the U.S. Fish and Wildlife Service (USFWS). The MBTA was amended in 1972 to include protection for migratory birds of prey (raptors). Avian species protected by the MBTA are present on the project site. As a general/standard condition, the project must comply with the MBTA.

5.2.2.2 State

California Environmental Quality Act

Primary environmental legislation in California is found in the California Environmental Quality Act (CEQA) and its implementing guidelines (CEQA Guidelines), requiring that projects with potential adverse effects or impacts to the environment undergo environmental review. This EIR is part of that environmental review. Adverse impacts to the environment are typically mitigated as a result of the environmental review process in accordance with existing laws and regulations.

California Fish and Game Code

Pursuant to California Fish and Game Code Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Raptors and owls and their active nests are protected by California Fish and Game Code Section 3503.5, which states that it is unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird unless authorized by the CDFW. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA. These regulations could require that construction activities (particularly vegetation removal or construction near nests) be reduced or eliminated during critical phases of the nesting cycle unless surveys by a qualified biologist demonstrate that nests, eggs, or nesting birds will not be disturbed. As a general/standard condition, the project must comply with California Fish and Game Code.

5.2.2.3 City of San Diego

Environmentally Sensitive Lands Regulations

Mitigation requirements for sensitive biological resources follow the requirements of the City's Biology Guidelines (City of San Diego 2018a) as outlined in the City's Environmentally Sensitive Lands (ESL) Regulations (San Diego Municipal Code [SDMC] Chapter 14, Article 3, Division 1). ESL Regulations serve as standards for the determination of biological impacts and mitigation under CEQA in the City. ESL include sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs and 100-year floodplains (SDMC Section 143.0110).

The purpose of the ESL Regulations is to, "protect, preserve and, where damaged, restore the ESL of San Diego and the viability of the species supported by those lands" (SDMC Section 143.0101).

The ESL Regulations specify development requirements inside and outside of the City's preserve, the MHPA. Inside the MHPA, development must be located in the least sensitive portion of a given site; outside of the MHPA, development must avoid wetlands and federal and/or State listed, non-MSCP-Covered Species (City of San Diego 2018a). As noted, the project site is not located within or adjacent to the MHPA. The ESL Regulations further require that impacts to sensitive biological resources must be assessed, and mitigation provided where necessary, as required by Section III of the City's Biology Guidelines (City of San Diego 2018a). The Biology Guidelines, MSCP, and MHPA are further addressed below.

Biology Guidelines

The City's Biology Guidelines (City of San Diego 2018a) have been formulated by the Development Services Department to aid in the implementation and interpretation of the ESL Regulations. The purpose of the ESL Regulations is to, "protect, preserve and, where damaged, restore the ESL of San Diego and the viability of the species supported by those lands" (SDMC 143.0101). Section III of the Biology Guidelines (Biological Impact Analysis and Mitigation Procedures) also serves as standards for the determination of impact and mitigation under CEQA. The Biology Guidelines are the baseline biological standards for processing Neighborhood Development Permits, Site Development Permits, and Coastal Development Permits issued pursuant to the ESL Regulations.

Multiple Species Conservation Program

The City's MSCP Subarea Plan (City of San Diego 1997) was prepared to meet the requirements of the State Natural Community Conservation Plan (NCCP) Act of 1992. The Subarea Plan is consistent with NCCP and is a stand-alone document that describes how proposed development projects may be implemented relative to the City's MSCP-designated regional preserve (i.e., the MHPA).

Multi-Habitat Planning Area

The MHPA was developed by the City in cooperation with the USFWS, CDFW, property owners, developers, and environmental groups using the Preserve Design Criteria contained in the Final MSCP Plan and the City Council-adopted criteria for the creation of the MHPA. MHPA lands are large blocks of native habitat that have the ability to support a diversity of plant and animal life and, therefore, have been included within the City's Subarea Plan for conservation. The MHPA also

delineates core biological resource areas and corridors targeted for conservation as these lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. The project site is not within the MHPA.

MHPA Land Use Adjacency Guidelines

Development adjacent to the MHPA is subject to special conditions to ensure that indirect impacts to the MHPA are minimized. Section 1.4.3 of the City's Subarea Plan outlines the requirements to address indirect effects related to drainage and toxics, lighting, noise, public access, invasive plant species, brush management, and grading/land development. The project site is not adjacent to the MHPA, however, so the adjacency guidelines would not apply.

Specific Management Directives

Section 1.5.7 of the City's MSCP Subarea Plan contains specific requirements for certain areas within the MHPA. The project site is not within the MHPA; therefore, there are no specific management directives for the project site.

Overall Management Policies and Directives

Section 1.5.7 of the City's MSCP Subarea Plan also contains requirements and goals for all MHPA areas. The project site is not within the MHPA; therefore, there are no overall management policies and directives for the project site.

5.2.3 Impact 1: Sensitive Species and Habitats

- Issue 1: Would the project result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the CDFW or USFWS?**
- Issue 2: Would the project result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?**

5.2.3.1 Impact Thresholds

Sensitive Species

Based on the City Significance Determination Thresholds (2020), the project would have a significant impact to biological resources if it would result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the CDFW or USFWS.

Impacts to individual sensitive species, outside of any impacts to habitat, may also be considered significant based upon the rarity and extent of impacts. Impacts to State or federal listed species and all City Narrow Endemics would be considered significant. Certain species covered by the MSCP (as noted in the City's Biology Guidelines), and other species not covered by the MSCP may be considered significant on a case-by case basis taking into consideration all pertinent information regarding distribution, rarity, and the level of habitat conservation afforded by the MSCP. This may include species in the CNPS Inventory of Rare and Endangered Plants (CNPS 2019) or on the CDFW's list of Special Animals (CDFW 2019).

Sensitive Habitats

Based on the City Significance Determination Thresholds (2020), the project would have a significant impact to biological resources if it would result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS.

Lands containing Tier I, II, IIIA, and IIIB habitats and all wetlands are considered sensitive and declining habitats, and impacts to these resources may be considered significant. Lands designated as Tier IV are not considered to have significant habitat value and impacts would not be considered significant.

Also, a project would have a significant direct or indirect impact on biological resources (City of San Diego 2020) if the project would:

- Substantially affect an endangered, rare, or threatened species of animal or plant or the habitat of the species; and/or
- Substantially diminish important upland or riparian habitat for fish, wildlife, or plants.

Additionally, nesting birds are protected by the MBTA and California Fish and Game Code. Compliance with the MBTA and California Fish and Game Code would be required for the project as a condition of approval.

Impacts are either direct or indirect and may be permanent or temporary. A direct impact is a physical change in the environment that is caused by and immediately related to a project, wherein the primary effect is removal of existing habitat, often replacing it with developed areas. Indirect impacts consist of reasonably foreseeable secondary effects of a project (such as noise or night lighting) that lead to habitat degradation. The magnitude of an indirect impact may be the same as a direct impact; however, the effects from an indirect impact often take longer to become apparent. Permanent impacts are assessed to areas that are permanently altered as a result of developed project features. Temporary impacts are assessed to areas that would be disturbed by construction activities but not ultimately converted to hardscape or landscaping. For purposes of this analysis, all impacts associated with the project are considered permanent.

5.2.3.2 Impact Analysis

Direct Impacts

Construction of the project could result in direct injury or mortality to the orange-throated whiptail and would result in direct loss of its habitat. Although the orange-throated whiptail is a State Species of Special Concern, it is also an MSCP-Covered Species, which means that the City has take authority for it, and it is adequately conserved in the MHPA. For these reasons, project impacts to the orange-throated whiptail and its habitat would be less than significant.

Potential impacts to nesting birds could result if clearing of vegetation or construction occurs during the breeding season (February 1 to September 15). Clearing of vegetation or other construction activities could cause destruction or abandonment of active nests or mortality of adults, young, or eggs resulting in a potentially significant impact. This impact would be avoided through compliance with the MBTA and California Fish and Game Code as a condition of approval.

One bat species has been identified as having the potential to occur at the project site; however, the western mastiff bat has low potential to roost on site because the project site does not support the species preferred roosting habitat (i.e., high vertical cliffs, rock quarries, outcrops of fractures boulders, and occasionally tall buildings). While the site does support a few palm trees, the species rarely roosts in palm trees. The potential for western mastiff bat to forage on site is also considered low. While the site does support some coastal scrub (3.2 acres), that vegetation is located among non-native vegetation and disturbed/developed areas on site, and the site, itself, is surrounded by urban, developed land. The species is noted to forage over urban environments but likely only opportunistically while commuting to higher-quality habitats, none of which are adjacent to the site. As such, no impacts to western mastiff bat would occur.

Project construction would result in direct, permanent on-site impacts to 2.3 acres of Tier II Diegan coastal sage scrub, 0.9 acres of Tier II Diegan coastal sage scrub-disturbed, and 0.8 acres of Tier IIIB non-native grassland (a total of 4.0 acres on site). The total acreage of impact to sensitive habitats would be 4.0 acres. Impacts to these habitats would be significant because they are Tier I through Tier IIIB.

Indirect Impacts

Habitat insularization is the fragmentation of large habitat areas into smaller “islands” effectively isolated from one another. Such fragmentation presents barriers to wildlife movement and breeding, splits animal and plant populations, and increases edge effects. The project site is largely surrounded by development in an urbanized portion of the City, although a 2.10-acre parcel of City fee-owned parkland abuts the property generally to the south. The parkland parcel is also largely surrounded by development as it is generally bordered by the project to the north, existing housing to the north, California Department of Transportation (Caltrans) right-of-way (ROW) and I-8 to the south, and Caltrans ROW and existing housing to the east. Development of the site, therefore, would not increase habitat insularization in the area of the project site or parkland parcel.

Landscaping and irrigation associated with proposed development may result in increased runoff. However, all runoff water from the project would be collected and treated on the project site in water quality basins and discharged into the city storm water system. Based on the project’s

drainage and water quality design features, less-than-significant impacts resulting from drainage or impaired water quality would occur.

Night lighting exposes adjacent wildlife species to an unnatural light regime, may alter their behavior patterns, and consequently result in a loss of species diversity. The project's surrounding landscape consists of existing development in an urban setting with night lighting, with the exception of the inaccessible open space parcel owned by the City Parks and Recreation situated immediately to the south. However, the open space parcel is not located in or adjacent to the MHPA and as such, would not result in indirect impacts associated with lighting. As such, less-than-significant lighting impacts to wildlife would occur.

The project's surrounding landscape consists of existing development in an urban setting, with the exception of the inaccessible open space parcel located south of the project site. Additionally, the project site is adjacent to College Avenue and I-8, all of which contributes to noise on the project site. The project site is not located within or adjacent to the MHPA and is located in an existing noisy, urban environment. As such, construction-related noise from clearing, grading, and vehicular traffic associated with project construction would result in less-than-significant impacts to wildlife.

5.2.3.3 Significance of Impact

The City has take authority for the orange-throated whiptail as part of the Subarea Plan and potential impacts to the species would be less than significant.

Potentially significant construction impacts to nesting birds protected by the MBTA and California Fish and Game Code would be avoided through compliance with the regulations, as required in the conditions of approval.

Direct impacts to Tier II Diegan coastal sage scrub, Tier II Diegan coastal sage scrub-disturbed, and Tier IIIB non-native grassland would be significant.

Indirect impacts from habitat insularization, drainage/decreased water quality, lighting, and noise would not occur or would be less than significant.

5.2.3.4 Mitigation, Monitoring, and Reporting

The following mitigation shall be implemented and is required consistent with the City's MSCP Subarea Plan and Biology Guidelines (City of San Diego 2018a) to reduce the project's significant direct and indirect impacts to sensitive habitats to below a level of significance.

General Mitigation

BIO-1: Biological Resource Protection during Construction.

I. Prior to Construction

- A. **Biologist Verification** – The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City Biology Guidelines (City of San Diego 2018a), has been retained to implement the project's biological monitoring program.

The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.

- B. **Preconstruction Meeting** – The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.
- C. **Biological Documents** – The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.
- D. **Biological Construction Mitigation/Monitoring Exhibit** – The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME), which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City Assistant Deputy Director (ADD)/MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.
- E. **Resource Delineation** – Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.
- F. **Education** – Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

II. During Construction

- A. **Monitoring** – All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the BCME. The Qualified Biologist shall

monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR shall be e-mailed to MMC on the first day of monitoring, the first week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.

- B. **Subsequent Resource Identification** – The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna onsite (e.g., flag plant specimens for avoidance during access, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state or federal regulations have been determined and applied by the Qualified Biologist.

III. Post Construction Measures

- A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, CEQA, and other applicable local, state and federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.

Sensitive Habitats

Mitigation for impacts to 3.2 acres of Diegan coastal sage scrub and Diegan coastal sage scrub-disturbed shall be mitigated at a ratio of 1:1 for impacts that would occur outside the MHPA, with mitigation that would occur inside the MHPA. Mitigation for impacts to 0.8 acres of non-native grassland shall be mitigated at a ratio of 0.5:1 (for habitat not occupied by the burrowing owl) since they occur outside the MHPA, and the mitigation would occur inside the MHPA (**Table 5.2-5, *Mitigation for Impacts to Sensitive Habitats***). According to the Biology Guidelines (City of San Diego 2018a), the Habitat Acquisition Fund is intended to be used for the mitigation of impacts to small (generally less than 5 acres), isolated sites with lower long-term conservation value. The project's impacts that require mitigation total 4.0 acres, and the site is surrounded by existing urban development (i.e., it has low long-term conservation value), therefore, the use of the Habitat Acquisition Fund would be appropriate based on the acreage requirement and the lower long-term conservation value of the site.

**Table 5.2-5
 MITIGATION FOR IMPACTS TO SENSITIVE HABITATS**

Vegetation Community	Impact (acres)	Ratio	Mitigation (acres)
Diegan coastal sage scrub (including disturbed) (Tier II)	3.2	1:1	3.2
Non-native grassland (Tier IIIB)	0.8	0.5:1 ^a	0.4
TOTAL	4.0	—	3.6

Source: Alden Environmental 2020

Note:

^a Because the habitat is not occupied by the burrowing owl.

The following mitigation is required to reduce the project’s significant direct impacts to sensitive habitats to below a level of significance.

BIO-2: Sensitive Habitats. Impacts to 4.0 acres of Diegan coastal sage scrub and non-native grassland shall be mitigated at ratios of 1:1 and 0.5:1 for impacts outside the Multi-Habitat Planning Area (MHPA) and mitigation inside the MHPA, respectively, pursuant to Table 3, *Upland Mitigation Ratios*, in the City’s Biology Guidelines (City of San Diego 2018a). Mitigation shall be accomplished via payment into the City’s Habitat Acquisition Fund equal to 3.6 acres of habitat.

5.2.4 Impact 2: Wetlands

Issue 3: Would the project result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?

5.2.4.1 Impact Thresholds

Based on the City Significance Determination Thresholds (2020), the project would have a significant impact to biological resources if it would result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means.

5.2.4.2 Impact Analysis

There are no wetlands on the project site. Therefore, the project would not result in impacts to wetlands.

5.2.4.3 Significance of Impact

The project would result in no impacts to wetlands as none is present on the project site.

5.2.4.4 Mitigation, Monitoring, and Reporting

No impacts are identified; no mitigation is required.

5.2.5 Impact 3: Wildlife Movement and Nursery Sites

Issue 4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?

5.2.5.1 Impact Thresholds

Based on the City Significance Determination Thresholds (2020), the project would have a significant impact to biological resources if it would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites.

5.2.5.2 Impact Analysis

There are no wildlife movement corridors or habitat linkages on, or adjacent to, the project site, and there are no native wildlife nursery sites on the project site. Therefore, the project would not interfere with wildlife corridors or impede the use of native wildlife nursery sites.

5.2.5.3 Significance of Impact

The project would not interfere with wildlife corridors or impede the use of native wildlife nursery sites; no impacts are identified.

5.2.5.4 Mitigation, Monitoring, and Reporting

No significant impacts are identified; no mitigation is required.

5.2.6 Impact 4: Conservation Planning

Issue 5: Would the project result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region?

5.2.6.1 Impact Thresholds

Based on the City Significance Determination Thresholds (2020), the project would have a significant impact to biological resources if it would result in a conflict with the provisions of an adopted Habitat Conservation Plan, NCCP, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region.

5.2.6.2 Impact Analysis

Since the project site is not located within or adjacent to the MHPA, and there are no edge effects to address for the orange-throated whiptail (as required by Area Specific Management Directives for this MSCP-Covered Species identified in Appendix A of the City's MSCP Subarea Plan), the project would not conflict with the Subarea Plan or NCCP and less-than-significant impacts would occur.

5.2.6.3 Significance of Impact

The project would result in less-than-significant impacts as it would not conflict with the MSCP Subarea Plan or NCCP.

5.2.6.4 Mitigation, Monitoring, and Reporting

No significant impacts are identified; no mitigation is required.

5.2.7 Impact 5: Edge Effects

Issue 6: Would the project result in introducing a land use within an area adjacent to the MHPA that would result in adverse edge effects?

5.2.7.1 Impact Thresholds

Based on the City Significance Determination Thresholds (2020), the project would have a significant impact to biological resources if it would result in introducing a land use within an area adjacent to the MHPA that would result in adverse edge effects.

5.2.7.2 Impact Analysis

The project is not within or adjacent to the MHPA, so it would have no edge effect impacts on the MHPA.

5.2.7.3 Significance of Impact

The project would have no edge effect impacts on the MHPA, and no impacts are identified.

5.2.7.4 Mitigation, Monitoring, and Reporting

No significant impacts are identified; no mitigation is required.

5.2.8 Impact 6: Policies and Ordinances

Issue 7: Would the project result in a conflict with any local policies or ordinances protecting biological resources?

5.2.8.1 Impact Thresholds

Based on the City Significance Determination Thresholds (2020), the project would have a significant impact to biological resources if it would result in a conflict with any local policies or ordinances protecting biological resources.

5.2.8.2 Impact Analysis

As explained in Section 5.2.4.2, *Impact Analysis*, for Impact 2, *Wetlands*, there are no wetlands on the project site. Additionally, no federal and/or State listed, non-MSCP-Covered Species were found or are expected to occur on the project site. The project would be required to obtain a Site Development Permit in accordance with the ESL Regulations and would not result in a conflict with SDMC regulations protecting biological resources.

5.2.8.3 Significance of Impact

The project would not conflict with ESL Regulations, and less-than-significant impacts are identified.

5.2.8.4 Mitigation, Monitoring, and Reporting

No significant impacts are identified; no mitigation is required.

5.2.9 Impact 7: Invasive Plant Species

Issue 8: Would the proposal result in an introduction of invasive species of plants into a natural open space area?

5.2.9.1 Impact Thresholds

Based on the City Significance Determination Thresholds (2020), the project would have a significant impact to biological resources if it would result in an introduction of invasive species of plants into a natural open space area.

5.2.9.2 Impact Analysis

The project site is surrounded by existing urban development, except for fee-owned parkland owned by the City Parks and Recreation Department that abuts the project site to the south. This open space is comprised of a 2.10-acre parcel generally bordered by the project to the north, existing housing to the north, Caltrans ROW and I-8 to the south, and Caltrans ROW and existing housing to the east. The project's landscape plan incorporates native or naturalized species that are not invasive in character and would ensure native trees and plant material are used adjacent to the parkland. The project would not introduce invasive species of plants into the parkland and would

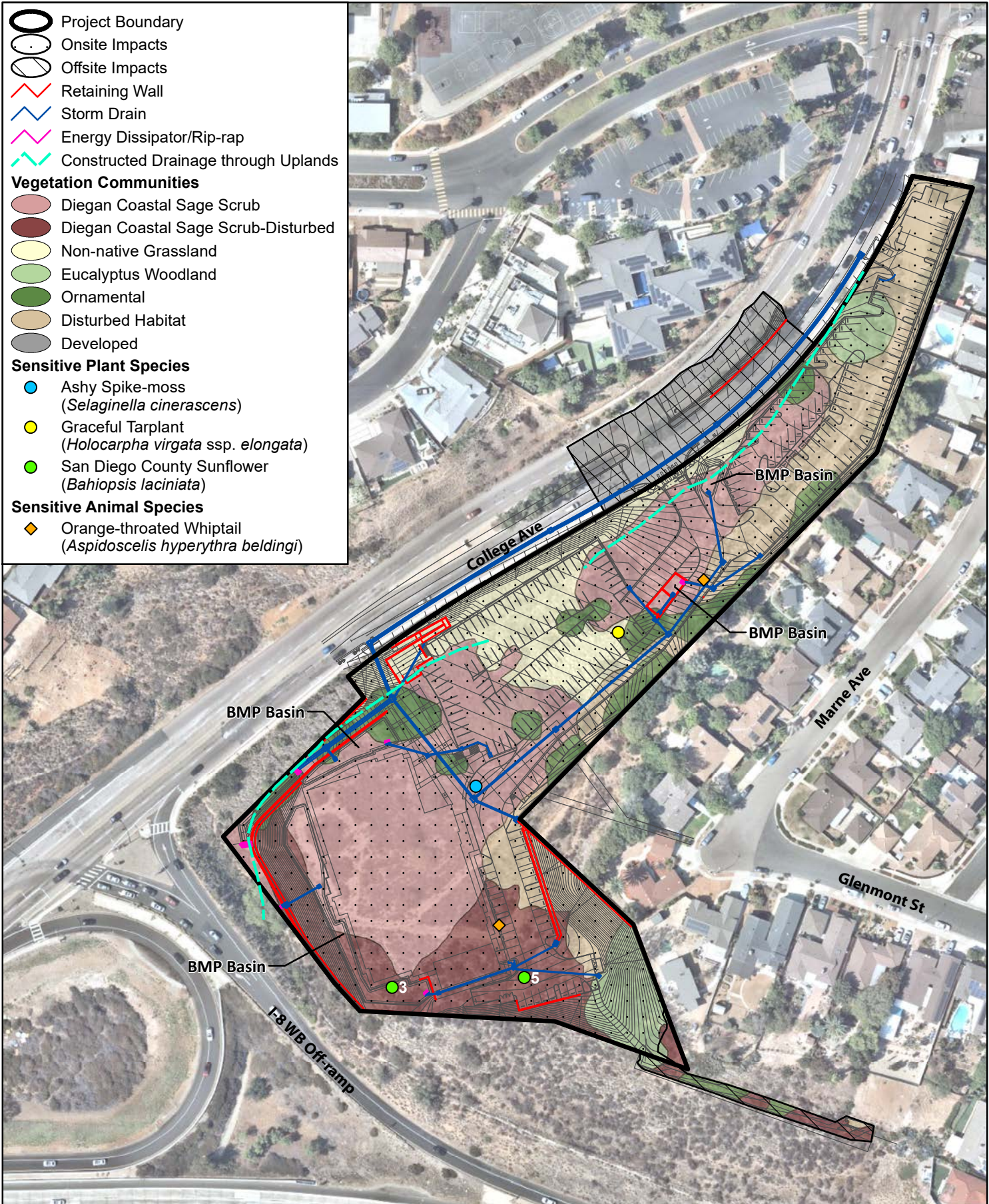
have measures in place to prevent their establishment; therefore, less-than-significant impacts are identified.

5.2.9.3 Significance of Impact

The project would not introduce invasive plant species into natural open space, and less-than-significant impacts are identified.

5.2.9.4 Mitigation, Monitoring, and Reporting

No significant impacts are identified; no mitigation is required.



Source: Alden Environmental; Aerial Photo: Nearmap 2021



Figure 5.2-1
Vegetation and Sensitive Species/Impacts

5.3 Historical Resources

This section of the Environmental Impact Report (EIR) is based on the Phase I Cultural Resource Survey for the subject property prepared by Brian F. Smith and Associates Inc. in April 2016. The results of the Cultural Resources Survey are summarized below, with related documentation included in **Appendix D**, *Phase I Cultural Resource Survey for the Del Cerro Project*, to this EIR. Although the Phase I Cultural Resource Survey was prepared in 2016, there have been no changes to the project site conditions that would impact cultural resources since the survey was prepared.

5.3.1 Existing Conditions

5.3.1.1 Natural Setting

The project site is located in an urbanized area. Vegetation within the project area is classified as primarily urban/developed, including various non-native grasses, ground cover, trees, and shrubs, with limited native habitat (refer to Section 5.2, *Biological Resources*, for details). Native coastal sage scrub vegetation was likely common to the area during prehistoric times. The coastal sage scrub and chamise chaparral plan communities comprised major food resources for prehistoric inhabitants, as did the rocky foreshore and sand beach marine communities of nearby coastal environs.

5.3.1.2 Cultural Setting

Several cultures have been identified as occurring in the vicinity of the project site, including a possible Paleo Indian manifestation of the San Dieguito Complex, the Archaic and Early Milling Stone horizons represented by the La Jolla Complex, and the Late Prehistoric Kumeyaay culture. The project vicinity was used for ranching and farming following the Hispanic intrusion into the region, continuing through the historic period. Refer to the Appendix D for more detailed description of the cultural setting of the project vicinity, including the prehistory and history of the area.

5.3.1.3 Built Environment

A built environment resource is any above-ground building, structure, object, or district. Historical resources are, or may be, significant architecturally or culturally in local, state, or national history. In general, any object, building, structure, site, area, place, record or manuscript which a Lead Agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the Lead Agency's determination is supported by substantial evidence in light of the whole record (California Environmental Quality Act [CEQA] Guidelines Section 15064.5). For the purposes of CEQA review, a significant historic resource is one that meets the criteria for listing on the National Register of Historic Places (NRHP), California Register of Historic Resources (CRHR), is listed in a local historic register or is deemed significant in a historical resource survey, as provided under Public Resources Code (PRC) Section 5024.1(g) (City of San Diego 2016). The project site is currently undeveloped and contains no historic structures.

5.3.1.4 Methods and Results

Archival Research

Determinations of historical and architectural significance require a number of issues to be considered. Factors of significance include: the property's history, both construction and use; the history of the surrounding community; the potential for important persons or events to be associated with the property over its life span; the number of resources associated with the property; the potential for the resources to be the work of a master craftsman, architect, landscape gardener or artist; what historical, architectural, or landscape influences have shaped the design of the property and its pattern of use; what alterations have taken place over the years and how any changes have affected the historical integrity of the property; and the integrity of the property. These questions and related issues must be answered before a final determination of significance can be achieved.

The archival research for the project site included a records search at the South Coastal Information Center (SCIC) at San Diego State University (SDSU), and a search of the Brian F. Smith Associates archives to determine if any recorded resources were present within the project area. The SCIC records search indicated that no previously recorded archaeological sites were present at the project site, but 12 cultural resource locations have been recorded within one mile of the project site. These previously recorded sites included two prehistoric artifact scatters, two prehistoric milling feature sites with associated artifacts, one prehistoric shell scatter, one prehistoric isolate, five historic structures (including the Aztec Bowl at SDSU, located approximately 0.7 mile southwest of the project site), and one unknown resource. The majority of the historic properties identified during the records search are related to SDSU. Sixty-six cultural resource studies have been conducted within a one-mile radius of the project site. None of these previous studies overlap with the project site; however, two of the studies partially touch the edge of the study area for the project site. These two studies are large overview studies and do not contain information specific to the project site.

In addition to the records search, project research also included a review of the following historic sources: the National Register of Historic Places Index; the Office of Historic Preservation (OHP), Archaeological Determinations of Eligibility; OHP Directory of Properties in the Historic Property Data File; the 1:24,000-scale United States Geological Survey La Mesa (1953) topographic map; and the San Diego County 1872 map. The review of these sources did not indicate the presence of cultural resources within or immediately adjacent to the project. Only the archaeological records search from the SCIC documented prehistoric sites near the project boundaries.

A Sacred Lands File (SLF) search was requested from the Native American Heritage Commission (NAHC). The NAHC SLF search did not indicate the presence of any Native American cultural resources in the immediate vicinity of the project site. Contact was initiated with the tribes listed by the NAHC. One response was received, from the Lipay Nation of Santa Ysabel, with a request that a Kumeyaay Native American monitor be present for all ground-disturbing activities associated with the project.

Field Survey

In addition to the archival research described above, the Cultural Resources Survey included a pedestrian field survey. Visibility constraints were present during the survey, with only 50 percent ground visibility due to heavy vegetation. Exposed ground surfaces were closely inspected for

evidence of the potential presence of cultural resources. No artifacts, cultural ecofacts, or other materials related to prehistoric or historic land use were identified within the project site during the pedestrian field survey. No midden soils or cultural resources were observed.

5.3.2 Regulatory Framework

5.3.2.1 The National Historic Preservation Act of 1966

The National Historic Preservation Act of 1966 established the NRHP as the official federal list of cultural resources that have been nominated by state offices for their historical significance at the local, state, or national level. Listing in the NRHP provides recognition that a property is significant to the nation, the state, or the community and assumes that federal agencies consider historic values in the planning for federal and federally assisted projects. Properties listed in the NRHP, or “determined eligible” for listing, must meet certain criteria for historical significance and possess integrity of form, location, and setting. Structures and features must usually be at least 50 years old to be considered for listing in the NRHP, barring exceptional circumstances. Criteria for listing in the NRHP, which are set forth in Code of Federal Regulations Title 36, Part 60, are the quality of significance in American history, architecture, archaeology, engineering, and culture as present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and:

- (a) That are associated with events that have made a significant contribution to the broad patterns of our history;
- (b) That are associated with the lives of persons significant in our past;
- (c) That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; and/or
- (d) That have yielded, or may be likely to yield, information important in prehistory or history.

Eligible properties must meet at least one of the criteria and exhibit integrity, measured by the degree to which the resource retains its historical properties and conveys its historical character, the degree to which the original fabric has been retained, and the reversibility of changes to the property. The fourth criterion is typically reserved for archaeological and paleontological resources. These criteria have largely been incorporated into the CEQA Guidelines as well, as discussed below.

5.3.2.2 California Register of Historic Resources

State law also protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The California criteria for the CRHR are nearly identical to those for the NRHP. The State Historic Preservation Officer maintains the CRHR. Properties listed, or formally designated eligible for listing, in the NRHP are automatically listed in the CRHR, as are State Landmarks and Points of Interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys. A resource is eligible for listing in

the CRHR if the State Historical Resources Commission determines that it is a significant resource and that it meets any of the following NRHP criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. It is associated with the lives of persons important in our past;
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; and/or
4. It has yielded, or may be likely to yield, information important to the prehistory or history.

Resources less than 50 years old generally are not considered for listing in the CRHR but may be considered if it can be demonstrated that sufficient time has passed to understand the historical importance of the resource.

5.3.2.3 Native American Historic Resource Protection Act

The Native American Historic Resource Protection Act (California PRC Section 5097 et seq.) addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction. It establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project. The Native American Historic Resource Protection Act establishes the NAHC as the authority to resolve disputes regarding the disposition of such remains.

5.3.2.4 California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act was enacted in 2001 (California Health and Safety Code Section 8010 et seq.). It requires all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items to complete an inventory and summary of these remains and items on or before January 1, 2003. The California Native American Graves Protection and Repatriation Act also provides a process for the identification and repatriation of these items to the culturally affiliated tribes.

5.3.2.5 California Health and Safety Code

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment of disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County coroner has examined the remains. California PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the California NAHC within 24 hours. The NAHC will notify the Most Likely Descendant. With the permission of the landowner, the Most Likely Descendant may inspect the site of the discovery. The inspection must be completed within 48 hours of notification of the Most Likely Descendant by the NAHC. The Most

Likely Descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

5.3.2.6 California Environmental Quality Act

The CEQA statues and CEQA Guidelines contain the following sections that are relevant to archaeological and historical resources:

- California PRC Section 21083.2(g) defines “unique archaeological resource.”
- California PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a) define historical resources. In addition, CEQA Guidelines Section 15064.5(b) defines the phrase “substantial adverse change” in the significance of a historical resource. It also defines the circumstances when a project would materially impair the significance of a historical resource.
- California PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated cemetery.
- California PRC Sections 21093.2(b) and 21083.2(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures. Preservation-in-place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context and may help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

Under CEQA, a project may have a significant impact on the environment if it may cause “a substantial adverse change in the significance of a historical resource” (California PRC Section 21084.1; CEQA Guidelines Section 15064.5(b)). If a site is listed or eligible for listing in the CRHR, included in a local register of historic resources, or identified as significant in a historical resources survey, it is a “historical resource” and is presumed to be historically or culturally significant for the purposes of CEQA (California PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)). The lead agency is not precluded from determining that a resource is a historical resource, even if it does not meet the criteria described herein.

5.3.2.7 City of San Diego Historical Resource Regulations

The City’s Historical Resources Regulations are contained in San Diego Municipal Code Chapter 14, Article 3, Division 2. The purpose and intent of the Regulations are outlined as follows:

To protect, preserve, and where damaged, to restore the cultural resources of San Diego, which include historical buildings, historical structures or historical objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. These regulations are intended to ensure that development occurs in a manner that protects the overall quality of historical resources. It is further the intent of these regulations to protect the educational, cultural, economic, and general welfare of the public, while employing regulations that are consistent with sound historical preservation principles and the rights of private property owners.

The regulations apply to all development with the City of San Diego when cultural resources are present within the premises, regardless of the requirement to obtain a Neighborhood Development Permit or Site Development Permit.

The regulations have been developed to implement applicable local, state, and federal policies and mandates. Included in these are the General Plan, CEQA, and National Historic Preservation Act of 1966 Section 106. Historical resources, in the context of the City's regulations, include site improvements, buildings, structures, historic districts, signs, features (including significant trees or other landscaping), places, place names, interior elements and fixtures designated in conjunction with a property, or other objects of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance to the citizens of the city. These include structures, buildings, archaeological sites, objects, districts, or landscapes having physical evidence of human activities. These resources are usually over 45 years old, and they may have been altered or still be in use.

5.3.2.8 City Historic Resources Register

According to the City's Historical Resources Guidelines (City of San Diego 2001), any improvement, building, structure, sign, interior element and fixture, site, place, district, area or object may be designated as historic by the City of San Diego Historical Resource Board if it meets any of the following criteria:

- A. Exemplifies or reflects special elements of the City's, a community's or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development;
- B. Is identified with persons or events significant in local, state or national history;
- C. Embodies distinctive characteristics of a style, type, period or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;
- D. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist or craftsman;
- E. Is listed on or has been determined eligible by the National Park Service for listing on the NRHP or is listed or has been determined to be eligible by the California OHP for listing on the CRHR; and/or
- F. Is a finite group of resources related to one another in a clearly distinguishable way; or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest, or aesthetic value; or which represent one or more architectural periods or styles in the history and development of the city.

5.3.3 Impact 1: Historical Resources

Issue 1: Would the project result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, or object or site?

5.3.3.1 Impact Thresholds

Based on the City of San Diego's Significance Determination Thresholds (2020), historical resource impacts may be significant if the project would affect any of the following:

- A resource listed in, eligible for, or potentially eligible for the NRHP;
- A resource listed in, or determined to be eligible by, the State Historical Resources Commission, for listing in the CRHR (PRC Section 5024.1);
- A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k), or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and/or
- Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (PRC Section 5024.1), including the following criteria:
 - a. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
 - b. Is associated with the lives of persons important in our past;
 - c. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
 - d. Has yielded, or may be likely to yield, information important in prehistory or history.

The determination of significance of impacts on historical and unique archaeological resources is based on the criteria found in CEQA Guidelines Section 15064.5. Section 15064.5 clarifies the definition of a substantial adverse change in the significance of a historical resource as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired."

5.3.3.2 Impact Analysis

Archaeological Resources

As discussed in the existing conditions section, no prehistoric cultural resources were recorded or observed on site. However, there are recorded cultural resources within a one-mile radius of the

project site. Based on the presence of prehistoric and historic resources in the project vicinity, and the low ground visibility at the project site during the pedestrian field survey, the potential exists for unknown buried archaeological and Native American resources to occur. The construction of the project has the potential to encounter and potentially damage or destroy unknown buried archaeological and Native American resources.

Built Environment

The project site is currently undeveloped and contains no historic structures. Off-site road improvements to College Avenue and off-site improvements associated with the proposed sewer connection would not cause impacts to any structures. Therefore, the project would not have the potential to damage historic structures.

5.3.3.3 Significance of Impacts

No prehistoric cultural resources were recorded or observed at the project site. However, ground disturbance associated with the construction of the project has the potential to uncover previously unknown archaeological and Native American resources, resulting in a potentially significant impact.

5.3.3.4 Mitigation, Monitoring, and Reporting

The following measure shall be implemented in accordance with Chapter 14, Article 3, Division 2, Historical Resources Regulations, of the Land Development Code to reduce the project's historical resources impacts to unknown archaeological resources to a less-than-significant level:

HR-1: Cultural Resources (Archaeological Resources) Protection during Construction.

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.

B. Letters of Qualification have been submitted to ADD

1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.

3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site-specific records search (0.25-mile radius) has been completed. Verification includes, but is not limited to, a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
3. The PI may submit a detailed letter to MMC requesting a reduction to the 0.25-mile radius.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.
 - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. *Identify Areas to Be Monitored*
 - a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.
 - b. The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).
3. *When Monitoring Will Occur*
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
 - b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final

construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. *Monitor(s) Shall Be Present during Grading/Excavation/Trenching*

1. The Archaeological Monitor shall be present full time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances Occupational Safety and Health Administration safety requirements may necessitate modification of the AME.
2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and Section IV.A-D shall commence.
3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.
4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. *Discovery Notification Process*

1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery and shall submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.
4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. *Determination of Significance*

1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.
 - b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor, and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground-disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.
 - c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. **Discovery of Human Remains**

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (PRC) (Section 5097.98) and State Health and Safety Code (Section 7050.5) shall be undertaken:

A. *Notification*

1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process.
2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. *Isolate Discovery Site*

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains.
2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.
3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.

C. *If human remains ARE determined to be Native American:*

1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call.
2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.
4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.
5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
 - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR;
 - b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN
 - c. To protect these sites, the landowner shall do one or more of the following:
 - (1) Record the site with the NAHC;
 - (2) Record an open space or conservation easement; or
 - (3) Record a document with the County. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.

D. *If human remains are NOT Native American:*

1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC Section 5097.98).
3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS,

the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

V. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract:

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
2. The following procedures shall be followed:
 - a. No Discoveries

In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSV and submit to MMC via fax by 8 a.m. of the next business day.
 - b. Discoveries

All discoveries shall be processed and documented using the existing procedures detailed in Section III, During Construction, and Section IV, Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.
 - c. Potentially Significant Discoveries

If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III, During Construction, and Section IV, Discovery of Human Remains, shall be followed.
 - d. The PI shall immediately contact MMC, or by 8 a.m. of the next business day to report and discuss the findings as indicated in Section III.B, unless other specific arrangements have been made.

B. If night and/or weekend work becomes necessary during the course of construction:

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC

- establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.
- a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with State of California Department of Parks and Recreation. The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.
2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
 3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
 4. MMC shall provide written verification to the PI of the approved report.
 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.
- B. *Handling of Artifacts*
1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued.
 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
 3. The cost for curation is the responsibility of the property owner.
- C. *Curation of Artifacts: Accession Agreement and Acceptance Verification*
1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.
 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
 3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV, Discovery of Human Remains, Subsection 5.

D. Final Monitoring Report(s)

1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

5.3.4 Impact 2: Religious or Sacred Uses

Issue 2: Would the project result in any impact to existing religious or sacred uses within the potential impact area?

5.3.4.1 Impact Thresholds

Based on the City of San Diego's Significance Determination Thresholds (2020), prehistoric and historic resource impacts may be significant if the project would result in impacts to:

- A religious property deriving primary significance from architectural or artistic distinction or historical importance; and/or
- A site associated with a burial or cemetery; religious, social, or traditional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the belief system of a discrete ethnic population.

5.3.4.2 Impact Analysis

Based on the records search conducted for the project site, no religious or sacred uses are known to exist within the project site; however, research indicates that prehistoric and historic resources are frequent in the surrounding area. Areas in the Del Cerro neighborhood, including areas to the west and further east of the project site, have yielded cultural remains that document prehistoric occupation. While no known resources have been discovered onsite through background research or the on-site pedestrian survey, based on the presence of prehistoric and historic resources in the area, the project has the potential to encounter unknown religious or sacred resources during ground-disturbing activities.

5.3.4.3 Significance of Impacts

No existing religious or sacred use is located on the project site. However, ground disturbance associated with the construction of the project has the potential to uncover previously unknown religious or sacred resources, resulting in a potentially significant impact.

5.3.4.4 Mitigation, Monitoring, and Reporting

With implementation of **Mitigation Measure HR-1**, as described above, impacts associated with religious or sacred uses would be reduced to a less-than-significant level.

5.3.5 Impact 3: Human Remains

Issue 3: Would the project result in the disturbance of any human remains, including those interred outside of formal cemeteries?

5.3.5.1 Impact Thresholds

Based on the City of San Diego's Significance Determination Thresholds (2020), prehistoric and historic resource impacts may would be significant if the project results in the discovery of human remains.

5.3.5.2 Impact Analysis

No formal cemeteries or known burial sites have been identified on or in the immediate vicinity of the project site. In the unlikely event of a discovery of human remains, the project would be required to comply with California PRC Section 5097.98, California Health and Safety Code Section 7050.5, and California Government Code Section 27491. These regulations identify procedures to be implemented in the event of a discovery of human remains. Work would be halted, and the procedures identified in PRC Section 5097.98 and the California Health and Safety Code would be followed.

5.3.5.3 Significance of Impacts

Construction of the project would result in ground disturbance, which has the potential to uncover previously unknown resources, including unknown human remains, resulting in a potentially significant impact.

5.3.5.4 Mitigation, Monitoring, and Reporting

With implementation of **Mitigation Measure HR-1**, as described above, impacts associated with the potential for discovery of human remains would be reduced to a less-than-significant level.

5.4 Noise

This section of the Environmental Impact Report (EIR) is based on the Noise Impact Assessment prepared by ECORP Consulting, Inc. (March 2020, as amended in October 2021) that examines the potential noise impacts associated with the project. The noise analysis is summarized in this section, and both reports are included in **Appendix E, Noise Impact Assessment and Noise Technical Memorandum**, of this EIR.

5.4.1 Existing Conditions

5.4.1.1 Fundamentals of Noise and Environmental Sound

Noise is defined as unwanted or annoying sound that interferes with or disrupts normal activities. Exposure to high noise levels has been demonstrated to cause hearing loss. The individual human response to environmental noise is based on the sensitivity of that individual, the type of noise that occurs, and when the noise occurs.

Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz). The dB scale is logarithmic, not linear, and therefore sound levels cannot be added or subtracted through ordinary arithmetic. Two sound levels 10 dB apart differ in acoustic energy by a factor of 10. When the standard logarithmic decibel is A-weighted (dBA), an increase of 10 dBA is generally perceived as a doubling in loudness. For example, a 70 dBA sound is half as loud as an 80 dBA sound and twice as loud as a 60 dBA sound. When two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be 3 dB higher than one source under the same conditions (Federal Transit Administration [FTA] 2018).

Sound pressure level is measured on a logarithmic scale, with the 0 dBA level based on the lowest detectable sound pressure level that people can perceive (an audible sound that is not zero sound pressure level). Based on the logarithmic scale, a doubling of sound energy is equivalent to an increase of 3 dBA, and a sound that is 10 dBA less than the ambient sound level has no effect on ambient noise. Because of the nature of the human ear, a sound must be about 10 dBA greater than the reference sound to be judged as twice as loud. In general, a 3 dBA change in community noise levels is noticeable, while 1 to 2 dBA changes generally are not perceived.

Sound levels attenuate (or reduce) at a rate of approximately 3 dB for each doubling of distance from a line source, such as a roadway, depending on ground surface characteristics (Federal Highway Administration [FHWA] 2011). No excess attenuation is assumed for hard surfaces like a parking lot or a body of water. Soft surfaces, such as soft dirt or grass, can absorb sound, so an excess ground-attenuation value of 1.5 dB per doubling of distance is normally assumed. For line sources, an overall attenuation rate of 3 dB per doubling of distance is assumed (FHWA 2011).

In addition to the actual instantaneous measurement of sound levels, the duration of sound is important since sounds that occur over a long period of time are more likely to be an annoyance or cause direct physical damage or environmental stress. One of the most frequently used noise

metrics that considers both duration and sound power level is the equivalent noise level (Leq). The Leq is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). Typically, Leq is summed over a 1-hour period. Lmax is the highest root mean squared (RMS) sound pressure level within the measuring period, and Lmin is the lowest RMS sound pressure level within the measuring period.

The time period in which noise occurs is also important since noise that occurs at night tends to be more disturbing than that which occurs during the day. Community noise is usually measured using day-night average level (Ldn), which is the 24-hour average noise level with a 10 dBA penalty for noise occurring during nighttime (10 p.m. to 7 a.m.) hours, or Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a 5 dBA penalty for noise occurring from 7 p.m. to 10 p.m. and a 10 dBA penalty for noise occurring from 10 p.m. to 7 a.m. Noise levels described by Ldn and CNEL usually do not differ by more than 1 dBA. Daytime Leq levels are louder than Ldn or CNEL levels; thus, if the Leq meets noise standards, the Ldn and CNEL are also met.

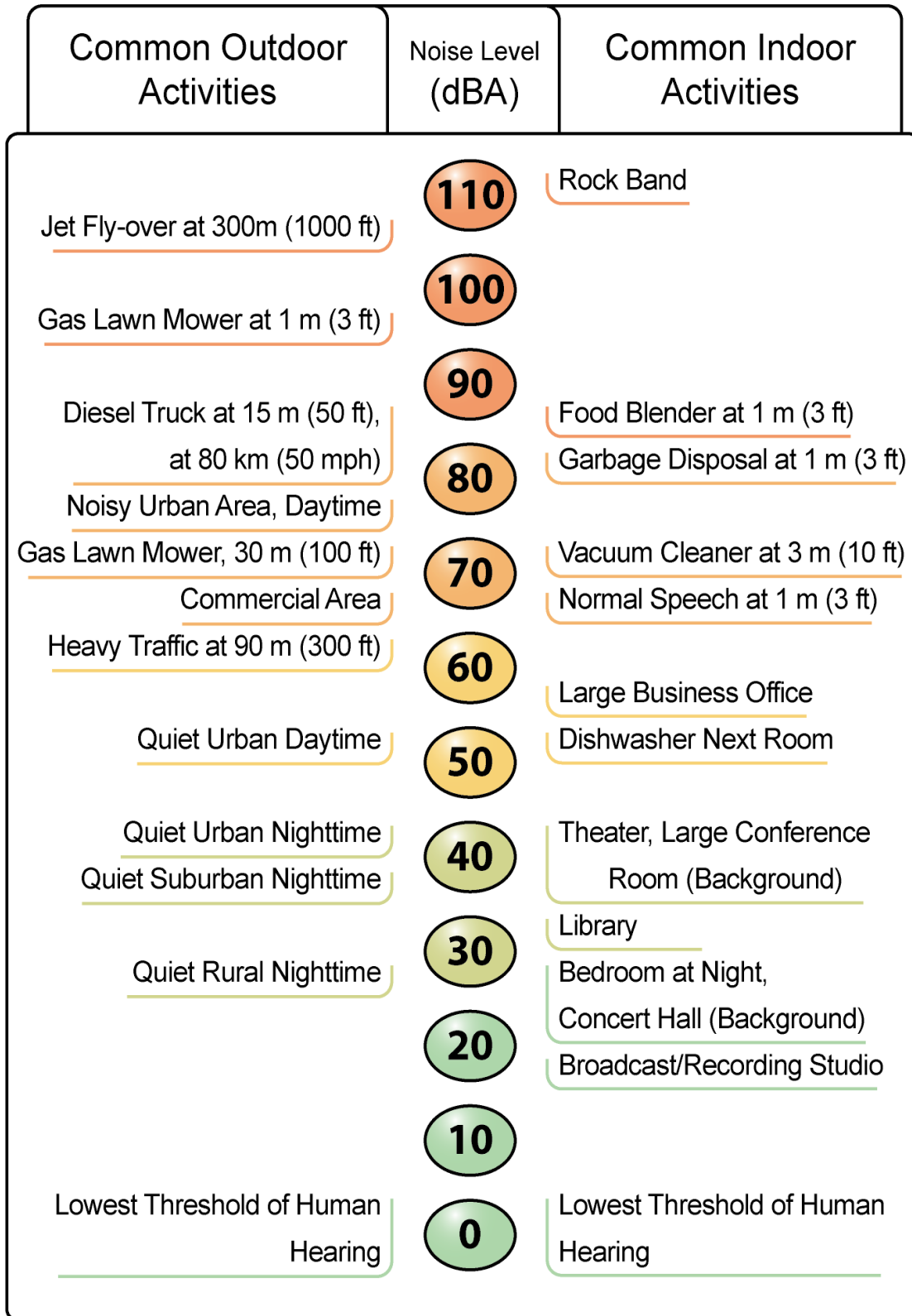
Noise levels may also be reduced by intervening structures. Generally, a single row of detached buildings between the receptor and the noise source reduces the noise level by about 5 dBA (FHWA 2008). A solid wall or berm generally reduces noise levels by 10 to 20 dBA (FHWA 2011). Noise barriers or enclosures specifically designed to reduce site-specific construction noise can provide a sound reduction of 35 dBA or greater (Western Electro-Acoustic Laboratory, Inc. 2000).

The manner in which older homes in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows (California Department of Transportation [Caltrans] 2002). The exterior-to-interior reduction of newer residential units is generally 30 dBA or more (Harris Miller, Miller & Hanson Inc. 2006). Generally, in exterior noise environments ranging from 60 dBA CNEL to 65 dBA CNEL, interior noise levels can be maintained below 45 dBA, a generally residential interior noise standard, with the incorporation of an adequate forced air mechanical ventilation system in each residential building and standard thermal-pane residential windows/doors with a minimum rating of Sound Transmission Class (STC) 28.

Figure 5.4-1, *Common Noise Levels*, provides various sounds levels of typical noise sources in Leq.

Sensitive Receptors

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as parks, historic sites, cemeteries, and recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses. The eastern site boundary contains residences with the closest unit located approximately 30 feet away from the project property line.



Source: California Department of Transportation 2020

Figure 5.4-1
 Common Noise Levels

Existing Noise Environment

The existing noise environment surrounding the project site is dominated by motor vehicles and traffic noise. The noise source most commonly affecting the project site and vicinity is produced by automotive vehicles, mainly that on Interstate 8 (I-8) and College Avenue (e.g., cars, trucks, buses, motorcycles). Traffic moving along streets produces a sound level that remains relatively constant and is part of the project area’s minimum ambient noise level.

To establish the ambient noise conditions on site, a 24-hour noise measurement was conducted on February 19, 2020, extending to February 20, 2020. Additionally, three short-term noise measurements were conducted on the afternoon of February 19, 2020. The noise measurements are representative of the typical existing noise experienced within and immediately adjacent to the project site and are depicted in **Table 5.4-1, Existing Ambient Noise Monitoring Results**. The ambient recorded noise level on the project site is 68.7 dBA CNEL. The ambient recorded noise levels adjacent to the project site ranged from 65.0 to 72.9 dBA. The noise source most commonly influencing ambient noise levels is produced by automotive vehicles, mainly those on I-8 and College Avenue (e.g., cars, trucks, buses, motorcycles). Monitoring locations are shown in **Figure 5.4-2, Noise Monitoring and Receiver Locations**.

**Table 5.4-1
EXISTING AMBIENT NOISE MONITORING RESULTS**

No.	Short-Term Measurement Location	Duration	Leq dBA	Lmin dBA	Lmax dBA
#1	At the intersection of Glenmont Street and Marne Avenue.	15 minutes	54.7	50.3	65.0
#2	At the intersection of Capri Drive and Arno Drive.	15 minutes	55.1	44.6	72.9
#3	At the intersection of Raydel Courte and Marne Avenue.	15 minutes	54.2	47.8	68.8
No.	Short-Term Measurement Location	Duration	Date	Duration	Leq (dBA)
#4	On the project site	24 hours	61.3	103.0	68.7

Source: ECORP 2020.

Notes:

L_{max} = The maximum A-weighted noise level during the measurement period.

L_{min} = The minimum A-weighted noise level during the measurement period.

Existing Traffic Noise

Existing roadway noise levels were calculated for the roadway segments in the project vicinity using the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108) and traffic volumes from the Project’s *Local Mobility Analysis* (Appendix J; LOS Engineering Inc. 2021a). Due to the nature of the traffic patterns for the project, traffic volumes have been analyzed for weekdays and Sundays. The model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (energy rates) used in the FHWA model have been modified to reflect average vehicle noise rates identified for California by the California Department of Transportation (Caltrans). The Caltrans data shows that California automobile noise is 0.8 to 1.0 dBA higher than national levels and that medium and heavy truck noise is 0.3 to 3.0 dBA lower than national levels. The average daily noise levels along the various studied roadway segments are presented in **Table 5.4-2, Existing Traffic Noise Levels**.

**Table 5.4-2
 EXISTING TRAFFIC NOISE LEVELS**

Roadway Segment	Surrounding Uses	CNEL at 100 feet from Centerline of Roadway	
		Weekday	Sunday
College Avenue			
North of Del Cerro Boulevard	Commercial and Residential	58.3	57.5
Between Del Cerro Boulevard and I-8 Westbound On-Ramp (adjacent to Project site)	Residential	60.1	59.2
North of Canyon Crest Drive	Commercial and Residential	63.6	61.5
South of Canyon Crest Drive	Commercial and Residential	62.2	60.4
Interstate 8			
I-8 Westbound Off-Ramp (toward College Avenue)	Residential	65.2	62.1
I-8 Westbound	Commercial and Residential	65.1	62.6
I-8 Eastbound	Commercial and Residential	63.2	58.4
I-8 Eastbound Off-Ramp (toward College Avenue)	Residential	59.6	58.1
Del Cerro Boulevard			
East of College Avenue	Commercial and Residential	52.7	51.8
West of College Avenue	Commercial and Residential	48.0	46.2

Source: ECORP 2020

Note:

A total of five intersections were analyzed in the Traffic Impact Study; however, only roadway segments that impact sensitive receptors were included for the purposes of this analysis.

As shown in the table, existing traffic-generated noise level on project-vicinity roadways during the weekday currently ranges from 48.0 to 65.2 dBA CNEL and 46.2 to 62.6 dBA CNEL on Sundays. As previously described, CNEL is 24-hour average noise level with a 5 dBA “weighting” during the hours of 7 p.m. to 10 p.m. and a 10 dBA weighting added to noise during the hours of 10 p.m. to 7 a.m. to account for noise sensitivity in the evening and nighttime, respectively. It should be noted that the modeled noise levels depicted in Table 5.4-2 may differ from measured levels in Table 5.4-1 because the measurements represent noise levels at different locations around the project site. Also, the short-term measurements in Table 5.4-1 are reported in different noise metrics (e.g., noise measurements are the Leq values and traffic noise levels are reported in CNEL).

5.4.2 Regulatory Framework

A project will normally have a significant noise-related effect on the environment if it will substantially increase the ambient noise levels for adjoining areas or conflict with adopted environmental plans and goals of the community in which it is located. The applicable noise standards governing the project site are the criteria in the City's General Plan Noise Element and the Noise Ordinance (San Diego Municipal Code [SDMC]).

5.4.2.1 City of San Diego General Plan Noise Element

The Noise Element of the City General Plan provides policy direction for minimizing noise impacts on the community and for coordinating with surrounding jurisdictions and other entities regarding noise control. By identifying noise-sensitive land uses and establishing compatibility guidelines for land use and noise, noise considerations will influence the general distribution, location, and intensity of future land use. The result is that effective land use planning and mitigation can alleviate the majority of noise problems.

The City requires new projects to meet exterior noise level standards as established in the Noise Element of the General Plan (City of San Diego 2015e: Policy NE-A.4). The City has adopted land use noise compatibility guidelines as a basis for planning decisions based on noise considerations. In the case that the noise levels identified at a proposed land use do not surpass the maximum allowable levels presented, the proposed land use type is considered compatible with the existing noise environment. The Land Use–Noise Compatibility Guidelines contained in the Noise Element are presented in **Table 5.4-3**, *City of San Diego Land Use–Noise Compatibility Guidelines*.

The City, as part of its noise guidelines, also includes standards governing interior noise levels that apply to all new single-family and multifamily residential units in California, consistent with California Code of Regulations Title 24. These standards require that acoustical studies be performed before construction at building locations where the existing Ldn exceeds 60 dBA. Such acoustical studies are required to establish mitigation measures that will limit maximum Ldn levels to 45 dBA in any habitable room. Although there are no generally applicable interior noise standards pertinent to all uses, many communities in California have adopted an Ldn of 45 dBA as an upper limit on interior noise in all residential units, as is the case for the City (see Table 5.4-3).

5.4.2.2 City of San Diego Noise Ordinance

The SDMC regulations with respect to noise are included in Chapter 5, *Public Safety, Morals, and Welfare*. SDMC Section 59.5.0404, *Construction Noise*, states that it is unlawful for any person, between the hours of 7 p.m. of any day and 7 a.m. of the following day, or on legal holidays, or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator. Additionally, per Section 59.5.0404 it is unlawful for any person to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 dBA Leq during the 12-hour period from 7 a.m. to 7 p.m.

**Table 5.4-3
 CITY OF SAN DIEGO LAND USE-NOISE COMPATIBILITY GUIDELINES**

Land Use Category	Exterior Noise Exposure			
	60	65	70	75
Parks and Recreational				
Parks, Active and Passive Recreation				
Outdoor Spectator Sports, Golf Courses; Water Recreational Facilities; Indoor Recreation Facilities				
Agricultural				
Crop Raising and Farming; Community Gardens, Aquaculture, Dairies; Horticulture Nurseries and Greenhouses; Animal Raising, Maintain and Keeping; Commercial Stables				
Residential				
Single Dwelling Units; Mobile Homes		45		
Multiple Dwelling Units (<i>*For uses affected by aircraft noise, refer to Policies NE-D.2 and NE-D.3</i>)		45	45*	
Institutional				
Hospitals; Nursing Facilities; Intermediate Care Facilities; Kindergarten through Grade 12 Educational Facilities; Libraries; Museums; Child Care Facilities		45		
Other Educational Facilities including Vocational/Trade Schools and Colleges and Universities		45	45	
Cemeteries				
Retail Sales				
Building Supplies/Equipment; Food, Beverages, and Groceries; Pets and Pet Supplies; Sundries, Pharmaceuticals, and Convenience Sales; Wearing Apparel and Accessories			50	50
Commercial Services				
Building Services; Business Support; Eating and Drinking; Financial Institutions; Maintenance and Repair; Personal Services; Assembly and Entertainment (includes public and religious assembly); Radio and Television Studios; Golf Course Support			50	50
Visitor Accommodations		45	45	45
Offices				
Business and Professional; Government; Medical, Dental, and Health Practitioner; Regional and Corporate Headquarters			50	50
Vehicle and Vehicular Equipment Sales and Service Uses				
Commercial or Personal Vehicle Repair and Maintenance; Commercial or Personal Vehicle Sales and Rentals; Vehicle Equipment and Supplies Sales and Rentals; Vehicle Parking				

**Table 5.4-3
CITY OF SAN DIEGO LAND USE-NOISE COMPATIBILITY GUIDELINES**

Land Use Category	Exterior Noise Exposure			
	60	65	70	75
Wholesale, Distribution, Storage Use Category				
Equipment and Materials Storage Yards; Moving and Storage Facilities; Warehouse; Storage Distribution				
Industrial				
Heavy Manufacturing; Light Manufacturing; Marine Industry; Tracking and Transportation Terminals; Mining and Extractive Industries				
Research and Development			50	

Notes:

	Compatible	Indoor Uses	Standard construction methods should attenuate exterior noise to an acceptable indoor noise level. Refer to Section I.
		Outdoor Uses	Activities associated with the land use may be carried out.
45, 50	Conditionally Compatible	Indoor Uses	Building structure must attenuate exterior noise to the indoor noise level indicated by the number (45 or 50) for occupied areas. Refer to Section I.
		Outdoor Uses	Feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable. Refer to Section I.
	Incompatible	Indoor Uses	New construction should not be undertaken.
		Outdoor Uses	Severe noise interference makes outdoor activities unacceptable.

Source: City of San Diego 2015e

The City's Noise Abatement and Control Ordinance also regulates fixed source and/or operational noise, as measured at the property line between the noise generator and the adjacent receptor. The noise limits are in terms of a 1-hour average sound level (or Leq). The allowable noise limits vary according to the land use and time of day. The noise limits for various land uses are depicted in **Table 5.4-4, City of San Diego Noise Ordinance Limits**. The sound level limit applies at any point on or beyond the boundary of the property on which the sound is produced. The sound level limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two zones (SDMC Section 59.5.0401(b)).

**Table 5.4-4
 CITY OF SAN DIEGO NOISE ORDINANCE LIMITS**

Land Use Zone ^a	Time of Day	1-hour Average Sound Level (dBA)
Single-Family Residential	7 a.m. to 7 p.m.	50
	7 p.m. to 10 p.m.	45
	10 p.m. to 7 a.m.	40
Multifamily Residential (up to a maximum density of 1/2000)	7 a.m. to 7 p.m.	55
	7 p.m. to 10 p.m.	50
	10 p.m. to 7 a.m.	45
All Other Residential	7 a.m. to 7 p.m.	60
	7 p.m. to 10 p.m.	55
	10 p.m. to 7 a.m.	50
Commercial	7 a.m. to 7 p.m.	65
	7 p.m. to 10 p.m.	60
	10 p.m. to 7 a.m.	60
Manufacturing and All Other Industrial, including Agricultural and Extractive Industry	Any time	75

Source: City of San Diego Noise Ordinance SDMC Section 59.5.0401

^a The sound level limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two districts.

5.4.3 Impact: Ambient Noise Increase

Issue 1: Would the project result in or create a significant increase in the existing ambient noise levels?

5.4.3.1 Impact Thresholds

According to the City's Significance Determination Thresholds (2020), a project would result in a significant noise impact:

- If it would result in temporary construction noise that exceeds 75 dBA Leq (12-hour) at the property line of a residentially zoned property from 7 a.m. to 7 p.m. (as identified in SDMC Section 59.0404) or if non-emergency construction occurs during the 12-hour period from 7 a.m. to 7 p.m., Monday through Saturday. Additionally, where temporary construction noise would substantially interfere with normal business communication, or affect sensitive receptors such as daycare facilities, a significant noise impact may be identified;
- If it would result in or create a significant permanent increase in the existing noise levels. If the ambient noise level already exceeds the noted threshold, then a project contribution of 3 dBA CNEL or greater would constitute a direct significant impact; and/or

- If it would result in the generation of noise levels at a common property line that exceed the SDMC limits shown in Table 5.4-4. If a non-residential use, such as a commercial, industrial, or school use, is proposed to abut an existing residential use, the decibel level at the property line should be the arithmetic mean of the decibel levels allowed for each use as set forth in SDMC Section 59.5.0401(b).

Impacts related to land use–noise compatibility are addressed in Section 5.1, *Land Use*.

5.4.3.2 Impact Analysis

Construction Noise

Construction noise associated with the project would be temporary and would vary depending on the nature of the activities being performed. Noise generated would primarily be associated with the operation of off-road equipment for onsite construction activities as well as construction vehicle traffic on area roadways. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., building construction, paving). Noise generated by construction equipment, including earthmovers, material handlers, and portable generators, can reach high levels. Typical operating cycles for these types of construction equipment may involve one or two minutes of full-power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). During construction, exterior noise levels could negatively affect sensitive receptors in the vicinity of the construction site.

Nearby noise-sensitive land uses consist of single-family residences to the north, east, and west of the project site. In order to estimate the worst-case construction noise levels that may occur at the nearest noise-sensitive receptors in the project vicinity, the combined construction equipment noise levels were calculated using the FHWA's Roadway Noise Construction Model (2008) for the demolition, site preparation, grading, paving, building, and coating phases. Construction would move around throughout the project site on any given day and would not be concentrated at one point for an extended period of time. Therefore, the distance between proposed construction activities and receptors was measured from the center of the project site. The anticipated short-term construction noise levels generated during demolition, grading, paving, building, and coating activities are presented in **Table 5.4-5, Construction Average (dBA) Noise Levels by Receptor Distance and Construction Phase – Unmitigated Condition**.

As shown in the table, the City's noise construction standard of 75 dBA Leq would be exceeded for several construction phases resulting in a significant noise impact. Noise source control is the most effective method of controlling construction noise. Source controls, which limit noise, are the easiest to oversee on a construction project. Mitigation at the source reduces the problem everywhere, not just along one single path or for one receiver. Noise path controls are the second method in controlling noise. Barriers or enclosures can provide a substantial reduction in the nuisance effect in some cases. Path control measures include moving equipment farther away from the receiver; enclosing especially noisy activities or stationary equipment; erecting noise enclosures, barriers, or curtains; and using landscaping as a shield and dissipater. Refer to the mitigation recommendations that address this impact under Section 5.4.3.4, *Mitigation, Monitoring, and Reporting*.

**Table 5.4-5
 CONSTRUCTION AVERAGE (DBA) NOISE LEVELS BY RECEPTOR DISTANCE AND CONSTRUCTION PHASE –
 UNMITIGATED CONDITION**

Construction Phase	Estimated Exterior Construction Noise Level at Property Line (dBA Leq)	Construction Noise Standard (dBA Leq)	Exceeds Standards?
Site Preparation	76.1	75.0	Yes
Grading	76.8		Yes
Building Construction	77.9		Yes
Paving	77.4		Yes
Painting	64.6		No

Source: ECORP 2020

Operational Noise

Exterior Traffic Noise

Traffic is the primary operational noise source that would be generated by the project. Future traffic noise levels were modeled based on the predicted traffic volumes identified by LOS Engineering, Inc. (2021a) to determine the project’s contribution to noise levels along project-vicinity roadways.

Table 5.4-6, Existing Plus Project Conditions – Predicted Traffic Noise Levels, shows the calculated offsite roadway noise levels under existing traffic noise levels compared to existing traffic noise levels with the project for weekdays and Sundays.

**Table 5.4-6
 EXISTING PLUS PROJECT CONDITIONS – PREDICTED TRAFFIC NOISE LEVELS**

Roadway Segment	Surrounding Uses	CNEL at 100 feet from Centerline of Roadway		Change in Noise Levels	Exceed 3 dBA Standard?
		Existing Conditions	Existing + Project Conditions		
Weekday Traffic Noise					
College Avenue					
North of Del Cerro Boulevard	Commercial and Residential	58.9	58.9	0.0	No
Between Del Cerro Boulevard and I-8 Westbound On-Ramp (adjacent to project site)	Residential	60.8	60.8	0.0	N/A
North of Canyon Crest Drive	Commercial and Residential	Not Analyzed in Weekday	Not Analyzed in Weekday	N/A	N/A
South of Canyon Crest Drive	Commercial and Residential	Not Analyzed in Weekday	Not Analyzed in Weekday	N/A	N/A

**Table 5.4-6
EXISTING PLUS PROJECT CONDITIONS - PREDICTED TRAFFIC NOISE LEVELS**

Roadway Segment	Surrounding Uses	CNEL at 100 feet from Centerline of Roadway		Change in Noise Levels	Exceed 3 dBA Standard?
		Existing Conditions	Existing + Project Conditions		
Interstate 8					
I-8 Westbound Off-Ramp (toward College Avenue)	Residential	61.0	61.0	0.0	No
I-8 Westbound	Commercial and Residential	63.8	63.8	0.0	No
I-8 Eastbound	Commercial and Residential	65.0	65.0	0.0	No
I-8 Eastbound Off-Ramp (toward College Avenue)	Residential	Not Analyzed in Weekday	Not Analyzed in Weekday	N/A	N/A
Del Cerro Boulevard					
East of College Avenue	Commercial and Residential	52.1	52.1	0.0	No
West of College Avenue	Commercial and Residential	48.7	48.7	0.0	No
Sunday Traffic Noise					
College Avenue					
North of Del Cerro Boulevard	Commercial and Residential	57.5	57.6	0.1	No
Between Del Cerro Boulevard and I-8 Westbound On-Ramp (adjacent to Project site)	Residential	59.2	59.9	0.7	No
North of Canyon Crest Drive	Commercial and Residential	61.5	62.1	0.6	No
South of Canyon Crest Drive	Commercial and Residential	60.4	60.6	0.2	No
Interstate 8					
I-8 Westbound Off-Ramp (toward College Avenue)	Residential	62.1	62.1	0.0	No
I-8 Westbound	Commercial and Residential	62.7	63.8	1.1	No
I-8 Eastbound	Commercial and Residential	62.6	63.9	1.3	No
I-8 Eastbound Off-Ramp (toward College Avenue)	Residential	58.1	60.5	2.4	No

**Table 5.4-6
 EXISTING PLUS PROJECT CONDITIONS – PREDICTED TRAFFIC NOISE LEVELS**

Roadway Segment	Surrounding Uses	CNEL at 100 feet from Centerline of Roadway		Change in Noise Levels	Exceed 3 dBA Standard?
		Existing Conditions	Existing + Project Conditions		
<i>Del Cerro Boulevard</i>					
East of College Avenue	Commercial and Residential	51.8	51.9	0.1	No
West of College Avenue	Commercial and Residential	46.2	46.3	0.1	No

Source: ECORP 2021

As shown in Table 5.4-6, a large majority of the roadway's segments already experience noise levels that exceed the noise standards in the City General Plan. As previously stated, outside of the laboratory, a 3 dBA change is considered a perceivable difference. As such, an increase of 3 dBA over the existing ambient noise level is considered significant. As shown in the table, the predicted increase in weekday and Sunday traffic noise levels associated with the project would not exceed 3 dBA over existing ambient conditions. As such, the increase in traffic noise would not be perceivable and the project would have a less-than-significant impact on ambient traffic noise levels.

Parking Structure and Lot Noise

Vehicles operating in the parking structure and/or parking lots may generate noise. This would include engine operation, period car alarm activation, and other noises commonly associated with vehicles operating in a parking lot or structure. These noises would be short-term, periodic, and consistent with noise that occurs within developed areas. Because of the duration, these sources typically do not impact the overall Leq at sensitive-receptors sites located in the proximity of parking structures. Typical noise levels associated with parking lot activities are 61.1 dBA Leq (ECORP 2020).

Table 5.4-7, *Predicted Stationary Source Operational Noise Levels*, shows the predicted noise propagation associated with parking lot activity/circulation, as estimated using the SoundPLAN 3D noise model. The analysis takes into consideration the three offsite locations where baseline noise measurements were taken, as well as seven additional locations at residences adjacent to the project site. While these noises would be audible, they would be part of the ambient condition occurring in the neighborhood.

As shown in Table 5.4-7, project noise levels would reach between 36.8 and 56.8 dBA at the modeled locations, including nearby noise-sensitive residences. These numbers fall below the City's single-family residential noise standard of 60 dBA. Furthermore, project noise modeling represents a worst-case scenario in which all parking lot activity is being generated at full intensity at the same moment. It is very unlikely that noise levels on the project site would reach that of those predicted in Table 5.4-7. Finally, it should be noted that the existing ambient noise level where baseline noise measurements were taken (Locations 1 through 3 in Figure 5.4-2) already exceed noise levels predicted by that of the project under existing conditions. Less-than-significant operational noise impacts are identified.

**Table 5.4-7
PREDICTED STATIONARY SOURCE OPERATIONAL NOISE LEVELS**

Site Location	Location	Modeled Operational Noise Attributable to Project (Leq dBA)	Affected Land Use	Exceed 60 dBA Standard?
1	At the intersection of Glenmont Street and Marne Avenue	48.9	Residential	No
2	At the intersection of Capri Drive and Arno Drive	36.8	Residential	No
3	At the intersection of Raydel Courte and Marne Avenue	42.5	Residential	No
4	Residence east of the project site adjacent to sanctuary	53.9	Residential	No
5	Residence east of the project site adjacent parking garage	53.5	Residential	No
6	Residence east of the project site adjacent parking garage	56.3	Residential	No
7	Residence east of the project site	56.8	Residential	No
8	Residence east of the project site	55.6	Residential	No
9	Residence north of the project site	44.9	Residential	No
10	Residence west of the project site	48.7	Residential	No

Source: ECORP 2020

Heating, Ventilation and Air Conditioning Noise

ECORP staff regularly conducts noise measurements within various land uses, at specific noise-generating events, and at individual pieces of noise-generating equipment in order to develop a wide sampling of potential noise levels associated with such. Previous noise measurements conducted by ECORP staff within 5 feet of an operating heating, ventilation and air conditioning (HVAC) identified a sound power level of 56.8 dBA Leq. At its closest point, the project’s HVAC unit would be positioned over 195 feet from the nearest residential receptor. As previously described, sound spreads (propagates) uniformly outward in a spherical pattern, and the sound level decreases (attenuates) at a rate of approximately 6 dBA for each doubling of distance from a stationary or point source. Therefore, accounting for this attenuation rate of 6 dBA for each doubling of distance from the proposed HVAC to the nearest residential receptor, the proposed HVAC unit, when operating, would generate a noise level of 30.8 dBA at the nearest residential receptor, which is well below the City standards and less-than-significant operational noise impacts are identified.

5.4.3.3 Significance of Impact

Based upon the City Noise Ordinance noise limits, construction noise impacts would have the potential to be significant exposing nearby residential properties to noise levels in excess of 75 dBA average at the property line of residentially zoned properties. Significant construction-related noise impacts are identified.

The project would not result in the exposure of people to current or future transportation noise levels that exceed City significance standards. Less-than-significant noise impacts would also occur from the operation of the parking structure and lots and HVAC equipment. Therefore, less-than-significant operational noise impacts are identified.

5.4.3.4 Mitigation, Monitoring, and Reporting



The following measure shall be required during construction to reduce temporary construction noise to acceptable levels and reduce the project's noise impacts to less than significance.

NOI-1 Best Management Practices. The following best management practices shall be incorporated into the project drawings and implemented during project construction to ensure sustained construction noise levels do not exceed 75 decibels over a 12-hour period at the nearest sensitive receivers:

- In order to reduce construction noise, a temporary noise barrier or enclosure shall be used along the property lines of adjacent residences to break the line-of-sight between the construction equipment and the adjacent residences. The temporary noise barrier shall consist of a solid plywood fence and/or flexible sound curtains attached to chain-link fencing.
- Barriers such as flexible sound control curtains shall be erected around stationary heavy equipment to minimize the amount of noise on the surrounding land uses to the maximum extent feasible during construction.
- Equipping of all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Electrical power shall be used to run air compressors and similar power tools, where feasible.
- Internal combustion engines shall be equipped with a muffler of a type recommended by the manufacturer and in good repair.
- All diesel equipment shall be operated with closed engine doors and be equipped with factory recommended mufflers.
- Prohibiting unnecessary idling of internal combustion engines.
- Locating stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors. Constructing temporary noise barriers to screen stationary noise-generating equipment when located near adjoining sensitive land uses.
- Utilization of "quiet" air compressors and other stationary noise sources where technology exists.
- Control of noise from construction workers' radios to a point where they are not audible at adjacent residences bordering the project site.
- Notifying of all adjacent residences of the construction schedule, in writing, and provide a written schedule of "noisy" construction activities to the adjacent and nearby residences at least 24 hours prior to initiation of construction activities that could result

in substantial noise levels at outdoor or indoor living areas. This notification should include the anticipated hours and duration of construction and a description of noise reduction measures being implemented at the project site. The notification should include the telephone number and/or contact information for the on-site noise control coordinator that neighbors can use for inquiries and/or to submit complaints associated with construction noise.

- Designation of a noise control coordinator who shall be responsible for responding to any complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., bad muffler, etc.) and shall require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule.

-  Project Boundary
-  Noise Monitoring and Receiver Location



Source: ECORPS; Aerial Photo: Nearmap 2021

Figure 5.4-2

Noise Monitoring and Receiver Locations



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5.5 Visual Effects and Neighborhood Character

This section evaluates potential visual effects and neighborhood character impacts associated with the project. It references environmental setting and project description information contained in other sections of this Environmental Impact Report (EIR), as applicable.

5.5.1 Existing Conditions

5.5.1.1 Visual Setting

The project site is an approximately 6-acre vacant property situated south and east of College Avenue near its interchange with Interstate 8 (I-8). The property extends from College Avenue east to a single-family neighborhood along Marne Avenue and the western end of Glenmont Street and between the I-8 off-ramp to a commercial property along Del Cerro Boulevard (refer to Figure 2-2 for project location information). As described in Section 5.2, *Biological Resources*, the project site is heavily vegetated and features a mix of native habitats, such as Diegan coastal sage scrub, as well as non-native uplands including non-native grassland, disturbed habitat, eucalyptus woodland, and ornamental plantings (i.e., pepper trees and palm trees). Existing developed areas affected by project construction include the sidewalk along the edge of College Avenue and a portion of the off-site median and street. Site photographs are contained in **Figure 5.5-1, Site Photographs from College Avenue**, and **Figure 5.5-2, Site Photograph from I-8 Corridor**.

Topographically, the terrain of the portion of the Del Cerro neighborhood surrounding the project site is hilly with development occurring along the ridgelines of undeveloped south-facing and west-facing slopes that descend in elevation toward College Avenue and I-8. As shown in Figure 2-6 in Chapter 2, *Environmental Setting*, much of the project site is lower in elevation than College Avenue, the I-8 freeway and westbound off-ramp, and the surrounding neighborhoods. The on-site terrain ranges in elevation from a low of 365 feet above mean sea level (AMSL) below the I-8 westbound off-ramp to a high of 450 feet above AMSL in the northern portion of the site. Near the center of the southern portion of the property at an elevation of 384 feet above AMSL occurs a broad level area which is surrounded by steep terrain. Much of the site has been previously altered by grading, as evidenced by the existence of artificial fill identified in the geotechnical report (Advanced Geotechnical Solutions 2020), and the steep slopes immediately east of College Avenue and north of I-8. The steep slopes are not naturally occurring since they feature the embankments created when the road and freeway were constructed.

Off-site in the nearby neighborhoods, the gas station and residences along Marne Avenue are at grade with the northern portion of the site and above grade of the southern portion of the site. Similarly, the homes along Glenmont Street (near the Marne Avenue intersection) are above the project site. Along the project frontage, College Avenue increases elevation from 400 to 450 feet above AMSL and splits grade as it travels northbound toward Del Cerro Boulevard.

5.5.1.2 Scenic Resources

In accordance with the State Scenic Highway Program, the General Plan classifies scenic highways and routes throughout the City. No roadways or freeways within the project area have been designated as scenic corridors by the California Department of Transportation (Caltrans) or the City.

In addition, no unique scenic resources occur on the project site, including trees, rock outcroppings or historic buildings, that are visible from a state scenic highway.

The Navajo Community Plan (Community Plan) does not formally designate any scenic view corridors or vantage points. However, the Community Plan does contain policies protecting the natural beauty and open space amenities of the community (see Section 5.5.2, *Regulatory Framework*).

5.5.1.3 Public Views

Public views are those provided from public resources such as freeways, public roadways, public transit, open space areas, public parks, and public recreation areas. Public views by local residents, workers and travelers through the project area are available from I-8 and other primary public roadways (i.e., College Avenue) and the light rail trolley line. There are no publicly accessible open spaces, parks, or recreation areas in the project vicinity with views of the project site; the adjacent dedicated parkland property fee-owned by the City Parks and Recreation does not have any trails or other designated public access or views. A description of the quality of views offered from public vantage points in the project area is provided below.

Freeway Views

Motorists traveling on I-8, which is adjacent to the project site, are provided peripheral views into the project site in the westbound direction, with off-ramp views of the project site available from both sides of the freeway. The eastbound I-8 travel lanes are not afforded expansive views of the project site due to the intervening local terrain and obstructions by development and the College Avenue overpass. According to Caltrans data from *2016 Traffic Volumes on California State Highways* (<http://dot.ca.gov/trafficops/census/>), which provides a snapshot of the magnitude of travelers along the freeway, the section of I-8 that crosses beneath College Avenue carries approximately 224,000 to 203,000 average annual daily trips with a peak hour volume of 17,700 vehicles. Although many freeway users travel through the project area on a daily basis, views from the freeway travel lanes are interrupted by topography and intervening development and structures (i.e., off-ramps) and are limited in duration due to the perpendicular viewing angle and high freeway rates of travel speed (i.e., 65 miles per hour [mph]). The exception are travelers exiting the I-8 westbound off-ramp at College Avenue who travel at a descending rate of speed and have peripheral views of the project site as they exit the freeway. Additionally, freeway travelers using the eastbound on-ramp to I-8 from College Avenue have unobstructed views over the freeway toward the project site until the lanes turn due east and enter the freeway (see Figure 5.5-2).

Trolley Views

The Metropolitan Transit System operates the Sycuan Green Line light rail trolley south of I-8 in the vicinity of the College Avenue freeway interchange. The trolley tracks are elevated above Alvarado Canyon Road turning south and rising up to the San Diego State University (SDSU) main campus east of College Avenue. Riders using the trolley have unobstructed views of the project site, although they are limited in duration because of the travel speed of the trolley line, intervening buildings, landscaping, and grade changes. In 2019, approximately 31,000 average daily passengers used the Sycuan Green Line Trolley (San Diego Association of Governments (SANDAG) 2020).

Local Street Views

Local street volumes and speeds are typically lower than those of the freeway and can offer longer duration views to travelers. Local streets are travelled by residents and workers who are very familiar with the visual conditions in the area, as well as visitors who are only experiencing views of the area temporarily. The primary local street with views of the project site is College Avenue, which is a 4-lane major road that splits grade in front of the project site as it rises up in elevation toward Del Cerro Boulevard. The median between the northbound and southbound travel lanes of College Avenue is partially landscaped with mature pine trees. About 30,000 vehicles travel the segment of College Avenue adjacent to the site at a posted speed limit of 40 mph.

Travelers using College Avenue are generally not afforded long-range (more comprehensive) views up or down the road corridor due to its curvilinear configuration, intervening buildings, and mature landscaping, including the median trees. Views of the project site from College Avenue are most comprehensive from the northbound travel lanes near the SDSU campus and through the I-8 interchange. As viewers travel north of the interchange and approach the project site, short-range views only capture the upper elevations of the property, as much of the project site is situated below grade of the road. Views of the project site from the southbound lanes of College Avenue traveling downhill from Del Cerro Boulevard are limited in scope due to the split grade, curvilinear routing, and intervening landscaped median. Unobstructed short-range views only appear to southbound lanes when the median breaks on the approach to the I-8 interchange. Figure 5.5-1 illustrates typical views of the site from the College Avenue travel lanes.

5.5.1.4 Designated Scenic Views

There are no scenic vistas designated in the project area. Although public views of the site are available from the travel lanes of College Avenue and I-8, neither of these vantage points are formally recognized as scenic vistas.

5.5.1.5 Neighborhood Character

The existing patterns of development in the Navajo community as a whole are predominantly suburban single-family residential in character, although there are several multifamily, commercial, and institutional buildings interspersed throughout the residential community. Examples of larger institutional structures in the Navajo community include the Temple Emanu-El, across College Avenue from the site, and St. Therese Catholic Church, located just over 0.75 miles to the northwest along College Avenue. Institutional academic buildings and multi-level parking structures associated with SDSU are located south of the project site and I-8. In addition, multi-family residential, medical office, hospital, and office buildings occur along Alvarado Canyon Road east of the interchange fronting the south side of I-8 within the College area community.

The project area is characterized by single and multi-family residential development atop steep slopes and commercial development along Del Cerro Boulevard. The single-family residences, commercial structures, and water pump station immediately adjacent to the project site are one- and two-story structures that feature backyard fencing and/or walls. Mature landscaping is interspersed throughout the community and within the College Avenue center median. West of College Avenue, across from the project site, are single-family homes atop steep undeveloped

hillsides and the multi-story Temple Emanu-El complex that resides at the intersection with Del Cerro Boulevard. A variety of architectural styles exist in the project area, including many ranch-style homes, as well as contemporary-style homes, commercial and institutional buildings. Spanish revival style buildings are also associated with campus structures at SDSU. As such, there is no specific architectural style or theme established in the Navajo community or surrounding project area.

5.5.2 Regulatory Framework

Existing policies, design guidelines, and development regulations provide relevant visual quality and neighborhood character policies for development in the project area. These include the General Plan, Community Plan, the Land Development Code (LDC), and Environmentally Sensitive Lands (ESL) Regulations.

5.5.2.1 City of San Diego General Plan

The City approved its General Plan on March 10, 2008. The General Plan is a comprehensive, long-term document that sets out a long-range vision and policy framework for how the City could grow and develop, provide public services, and maintain the qualities that define San Diego. Accordingly, the General Plan “provides policy guidance to balance the needs of a growing city while enhancing quality of life for current and future San Diegans” (City of San Diego 2008a). The General Plan is comprised of a Strategic Framework section and ten elements including: Land Use and Community Planning; Mobility; Urban Design; Public Facilities, Services, and Safety; Conservation; Historic Preservation; Noise; and Housing. The following two elements contain policies that pertain to visual resources and community character. More details on the specific General Plan policies that apply to the project are provided in Table 5.1-1 under the *Land Use* discussion.

Urban Design Element

The purpose of the Urban Design Element is “to guide physical development toward a desired image that is consistent with the social, economic and aesthetic values of the City” (City of San Diego 2008a). The Urban Design Element policies capitalize on San Diego’s natural beauty and unique neighborhoods by calling for development that respects the natural setting, enhances the distinctiveness of its neighborhoods, strengthens the natural and built linkages, and creates mixed-use, walkable villages throughout the city. Urban Design Element policies help support and implement land use and transportation decisions, encourage economic revitalization, and improve the quality of life in San Diego. Ultimately, the Urban Design Element influences the implementation of all of the General Plan’s elements and community plans. It sets goals and policies for the pattern and scale of development as well as the character of the built environment. Particularly relevant policies to the project from the Urban Design Element include Policies UC-A.3, UC-A.4, UC-A.5, UD-A.8, UD-A.10, UD-A.11, UD-A.12, UD-B.4, and UD-C.7, as discussed in Section 5.1, *Land Use*.

Conservation Element

The purpose of the Conservation Element is “to become an international model of sustainable development and conservation and to provide for the long-term conservation and sustainable management of the rich and natural resources that help define the City’s identity, contribute to its economy, and improve its quality of life” (City of San Diego 2008a). The Conservation Element

contains policies to guide the conservation of resources that are fundamental components of San Diego's environment, that help define the City's identity, and that are relied upon for continued economic prosperity. San Diego's resources include but are not limited to water, land, air, biodiversity, minerals, natural materials, recyclables, topography, viewsheds, and energy. The Conservation Element contains policies for sustainable development; preservation of open space and wildlife; management of resources; and other initiatives to protect the public health, safety, and welfare. Conservation policies applicable to the project are outlined in Section 5.1, *Land Use*, and consist of Policies CE-A.5, CE-I.4, and CE-J.4.

5.5.2.2 Navajo Community Plan

The Community Plan does not have a comprehensive urban design element like that of the General Plan. Design-related objectives and policies/proposals are, however, interspersed within Community Plan elements as outlined in Table 5.1-2 in Section 5.1, *Land Use*. The Community Environment Element of the Community Plan is focused on the community's image and visual form and recognizes the natural amenities that occur within the Community Plan area. An objective of this element is "to preserve and enhance the natural beauty and amenities of the Navajo Community." Policies geared toward implementing this objective address grading to preserve natural topography, buildings that create harmony between natural areas and urbanized development, signage that is complimentary to the community, landscaping that is focused on the heavily travelled roads in the community (i.e., College Avenue), and recognizing the importance of natural areas to conserve natural resources, preserve scenic beauty, and define urban form. See Table 5.1-2 for a listing of the specific policies from the Community Plan that are applicable to the project.

5.5.2.3 Land Development Code

The City's LDC contains numerous provisions to guide the design of development throughout the City. Through zoning and development standards, such as specified maximum building heights; maximum lot coverage; floor area ratios; and front, rear, and side yard setbacks, the LDC provides restrictions on land development and design that affect visual quality. The project site is located in the RS-1-7 zone, which is intended to accommodate single-family residential uses. The RS-1-7 zone permits a minimum lot area of 5,000 square feet (SF) and a maximum residential density of one dwelling unit (DU) for each 5,000 SF of lot area. Maximum building heights in the RS-1-7 zone are limited to 30 feet above grade. Maximum wall heights can be 6 feet above grade up to 50 linear feet. Setbacks vary in the zone depending on the configuration of the lot.

5.5.2.4 ESL Regulations

The LDC (Section 143.0101) contains development restrictions and guidelines to protect and enhance environmentally sensitive lands. Among other resources, the regulations are applied when a project impacts steep hillsides. Steep hillsides are defined as those with natural gradients equal to or in excess of 25 percent with a minimum elevation differential of 50 feet, or a natural gradient of 200 percent with a minimum elevation differential of 10 feet. The project site does not contain any naturally steep hillsides meeting these criteria, and these regulations are not discussed further.

5.5.3 Impact 1: Scenic Views

Issue 1: Would the project result in a substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan?

5.5.3.1 Impact Thresholds

According to the City's Significance Determination Thresholds (2020), visual impacts may be significant if the project would:

- Substantially block a view through a designated public view corridor as shown in an adopted community plan, the General Plan, or the Local Coastal Program;
- Cause substantial view blockage from a public viewing area of a public resource (such as the ocean) that is considered significant by the applicable community plan; and/or
- Exceed the allowed height or bulk regulations, and this excess results in a substantial view blockage from a public viewing area.

5.5.3.2 Impact Analysis

There are no vistas or scenic views designated in the project area by the Community Plan or General Plan. Although public views of the site are available from the travel lanes of College Avenue and I-8, neither of these vantage points are considered scenic vistas. In addition, there are no public resources visible from public viewing areas nearby. The roofline modulating elements of the church/sanctuary building would exceed the 30-foot building height limit in the RS-1-7 zone; however, the exceedance would not block a view of a designated public resource from a public viewing area, such as local roads. Therefore, the project would not obstruct any vista or scenic views identified in the Community Plan or General Plan.

5.5.3.3 Significance of Impact

The project would not block a designated public view corridor or a public viewing area of a public resource that is considered significant by the applicable community plan or General Plan. Therefore, less-than-significant impacts to public views would occur as a result of the project.

5.5.3.4 Mitigation, Monitoring, and Reporting

No significant impacts to public views are identified; therefore, no mitigation measures are required.

5.5.4 Impact 2: Neighborhood Character

Issue 2: Would the project result in the creation of a negative aesthetic site or project?

Issue 3: Would the project result in a project bulk, scale, materials, or style which would be incompatible with surrounding development?

Issue 4: Would the project result in substantial alteration to the existing or planned character of the area such as could occur with the construction of a subdivision in a previously undeveloped area? Note: for substantial alteration to occur, new development would have to be of a size, scale, or design that would markedly contrast with the character of the surrounding area.

5.5.4.1 Impact Thresholds

According to the City's Significance Determination Thresholds (2020), visual impacts to neighborhood character may be significant if the project would:

- Exceed the allowable height or bulk regulations and the height and bulk of the existing patterns of development in the vicinity of the project by a substantial margin;
- Have a negative visual appearance that meets one or more of the following conditions:
 - The project would create a disorganized appearance and would substantially conflict with City codes;
 - The project would significantly conflict with the height, bulk, or coverage regulations of the zone and does not provide architectural interest; and/or
 - The project includes crib, retaining, or noise walls greater than 6 feet in height and 50 feet in length with minimal landscape screening or berming where the walls would be visible to the public.
- Have an architectural style or use building materials in stark contrast to adjacent development where the adjacent development follows a single or common architectural theme;
- Be located in a highly visible area (e.g., on a canyon edge, hilltop or adjacent to an interstate highway) and would strongly contrast with the surrounding development or natural topography through excessive height, bulk, signage, or architectural projections; and/or
- Result in the physical loss, isolation or degradation of a community identification symbol or landmark (e.g., a stand of trees, coastal bluff, historic landmark) which is identified in the General Plan, applicable community plan or local coastal program.

5.5.4.2 Impact Analysis

Height and Bulk Regulations

The majority of the church/sanctuary building would comply with the 30-foot height limit established for the RS-1-7 zone. The exception would be the building's roofline modulation elements and religious symbol (i.e., cross). Three roof towers and a cross atop one of the towers would extend above the main roof to a height of 45 to 48 feet above grade for the roof towers and to 53 feet

above grade for the cross (refer to Figures 3-2 and 3-3 in the *Project Description*). The tower elements are proposed along the north, south and west elevations of the church structure to create visual interest and the cross signifies a religious assembly structure to passers-by from public roads, comparable to other religious assembly buildings in the community. The tallest roof tower feature would occur on the north elevation marking the entrance to the church/sanctuary between the entry plaza and parking structure. The roof tower would extend approximately 21 feet above grade at a minimum distance of 120 feet from the nearest residential properties along Marne Avenue (refer to **Figure 5.5-3, Architectural Cross-Sections**). The cross feature on the west elevation facing College Avenue would extend 8 feet higher than the 45-foot-high tower element and be situated approximately 24 feet above grade and over 210 feet west of the nearest residential properties. Cross-sections of the project grading and architecture relative to its surroundings are provided in Figure 3-4 in the *Project Description*.

In addition to the site layout that would place the church/sanctuary building in the southern portion of the site away from the residential neighborhood, a minimum 5-foot-wide landscape buffer containing spreading ground covers, taller screening shrubs and canopy trees, ranging in height from 25 to 40 feet, would be installed between the surface parking areas and residential properties to the east (Figure 3-6). As shown in the project cross-sections, although the rooftop elements of the project would exceed the allowable height regulations in the RS-1-7 zone, the church/sanctuary building itself would be placed in the lowest elevation of the site and recessed into the terrain, setback 195 feet from nearby residential properties, and architectural design elements and landscape buffer treatments would provide visual interest and screening to the nearby residential properties, thus avoiding a negative visual appearance despite the exceedance of the allowable height or bulk regulations.

Visual Appearance

The church/sanctuary building and parking structure are designed in a contemporary Spanish Colonial Revival-style theme featuring arched entrances and windows along their painted concrete tilt-up facades, with accents of wood facia and terra cotta colored tile roofing materials. The glazing for each window would be tinted bronze in color. Exterior building elevations and articulations are shown on Figures 3-2 and 3-3. The project's massing and architectural style would be distinctive from that of the surrounding one-story, ranch-style homes in the project vicinity. The project's architectural and landscape treatments would create visual interest and aesthetic features that would create a cohesive, rather than a disorganized, appearance. **Figure 5.5-4a, Project Visual Simulations – Northbound**, and **Figure 5.5-4b, Project Visual Simulations – Southbound**, contain computer simulations of the project when viewed from the travel lanes of College Avenue.

There is no consistent architectural styling or theme in the project area that would be disordered by the project; however, the project design would not resemble the low-stature residential subdivision style of the nearby neighborhood and instead would reflect the architectural styling of the SDSU academic buildings across the I-8/College Avenue interchange from the site. A similar architectural style is also used for a multi-family residential structure visible in the project area near Alvarado Hospital as well. Furthermore, the proposed church/sanctuary is not proposed on a visually prominent hillside or ridgeline, but rather on a topographic low-spot on the project site adjacent to the I-8 right of way (ROW).

A deviation for retaining wall heights is proposed to implement the project site/grading plan and form usable building areas in which to place the church structure and parking areas on the property. The retaining walls along the southern property line would also prevent the need to grade into the Caltrans ROW for I-8. There would be two retaining walls greater than 6 feet in height and longer than 50 feet in length that would be visible to the public and require deviations from the City development regulations. Both retaining walls are proposed along the southern project boundary fronting I-8 and its interchange with College Avenue to form building areas for the proposed structure and parking areas. The retaining walls would range in height from 4 to 19 feet and reach lengths between 75 and 450 linear feet. Both retaining walls would be placed below grade of the I-8 and College Avenue travel lanes and beyond the field of vision for drivers. Landscaping in the forms of trees, shrubs, and vines would be installed at the top and base of the walls to soften their appearance and ultimately provide visual screening through their growth characteristics (see Figure 3-6 in the *Project Description*). Additional discussion of the retaining walls is provided below in the landform alteration discussion under Issue 6.

Although the project would substantially alter the existing and planned residential character of the area, the project's height, bulk, signage, or architectural projections would not result in a negative visual appearance due to its topographically-sensitive site layout, cohesive architectural styling, and below grade placement of retaining walls combined with the heavy use of screening vegetation and landscape treatments to soften its appearance from nearby public and private viewing areas.

Community Symbol or Landmark

The project would develop a vacant site and would remove natural and non-native vegetation that currently occurs on site but is not recognized in the General Plan or Community Plan as unique or unusual in its appearance. There are no community identifying symbols, such as trees or historic structures, that would be removed by the project. Therefore, the project would not result in the loss, isolation, or degradation of a community identification symbol, or landmark identified in the General Plan or Community Plan. The project would appear to be a continuation of existing patterns of development in the project area at large.

5.5.4.3 Significance of Impact

Although the project would substantially change the character of the project site, the project design, as expressed through its grading, architecture, and landscaping, would not result in a negative visual appearance, exceed the bulk and scale of existing patterns of development in the area by a substantial margin, create a disordered appearance due to architectural style, result in the loss of a community identification symbol, or strongly contrast with surrounding development through excessive height, bulk, or architectural projections. Therefore, less-than-significant neighborhood character impacts would occur.

5.5.4.4 Mitigation, Monitoring, and Reporting

No significant impacts are identified; therefore, no mitigation is required.

5.5.5 Impact 4: Landmark Trees

Issue 5: Would the project result in the loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan? (Normally, the removal of non-native trees within a wetland as part of a restoration project would not be considered significant).

5.5.5.1 Impact Thresholds

If a project would result in the removal of any distinctive or landmark trees or stand of mature trees that are identified in the community plan, a significant impact would occur.

5.5.5.2 Impact Analysis

The Community Plan does not identify any of the trees located on the project site as scenic resources. Therefore, no impact would occur.

5.5.5.3 Significance of Impact

No distinctive or landmark trees are located on the project site; no impacts are identified.

5.5.5.4 Mitigation, Monitoring, and Reporting

No significant impacts would occur; no mitigation is required.

5.5.6 Impact 5: Landform Alteration

Issue 6: Would the project result in a substantial change in the existing landform?

5.5.6.1 Impact Thresholds

According to the City's Significance Determination Thresholds (2016), landform impacts may be significant if the project would:

- Alter more than 2,000 cubic yards of earth per graded acre by either excavation or fill, in addition to one or more of the following conditions:
 - Disturb steep hillsides in excess of the encroachment allowances of the ESL regulations (LDC Chapter 14, Article 3, Division 1);
 - Create manufactured slopes higher than 10 feet or steeper than 2:1 (50 percent); and/or
 - Result in a change in elevation of steep hillsides from existing grade to proposed grade of more than 5 feet by either excavation or fill unless the area over which excavation or fill would exceed 5 feet is only at isolated points on the site.

The above conditions may not be considered significant, however, if the grading plans clearly demonstrate, with both spot elevations and contours, that the proposed landforms will very closely

imitate the existing on-site landform and/or the undisturbed, pre-existing surrounding neighborhood landforms. This may be achieved through “naturalized” variable slopes.

5.5.6.2 Impact Analysis

Approximately 93 percent (or 5.6 acres) of the approximately 6-acre site would be graded to implement the project. Grading would require 16,500 cubic yards (cy) of cut and 39,000 cy of fill. The proposed grading would result in 6,964 cy per graded acre, which would exceed the 2,000 cy per graded acre significance threshold. However, as described in Chapter 2, *Environmental Setting*, and shown as Figures 2-6 and 2-7, prior grading has altered site topography and fills on the order of 20 to 30 feet deep were historically placed throughout the site. Therefore, there are no naturally occurring steep slopes or natural topography on the project site.

The maximum fill depth proposed by the project would be 28 feet, while the maximum cut depth would be 25.5 feet. Manufactured slopes would be created around the perimeter of the site ranging in height from 5 to 23 feet; however, all slopes would not be steeper than 2:1 in accordance with the LDC grading requirements. Elevation changes of more than 5 feet on steep hillsides would not be significant because the on-site hillsides are not naturally occurring as defined by the ESL Regulations (San Diego Municipal Code [SDMC] Section 143.0142). Retaining walls would be used in several locations to form buildable areas and avoid grading into the Caltrans ROW, as described under Issue 2 and shown in Figure 3-1. Due to the extent of prior site disturbances and grading on the project site, proposed grading would not have a significant impact on natural landforms.

5.5.6.3 Significance of Impact

Although the project would cause more than 2,000 cy of cut and fill per graded acre and would exceed the 10-foot-high threshold for manufactured slopes, the project site’s topography and landforms are not naturally occurring; therefore, the impact to existing landforms would be considered less than significant.

5.5.6.4 Mitigation, Monitoring, and Reporting

No significant impacts to natural landforms are identified; no mitigation is required.

5.5.7 Impact 6: Light and Glare

Issue 6: Would the project result in substantial light or glare which would adversely affect daytime or nighttime view in the area?

5.5.7.1 Impact Thresholds

According to the City’s Significance Determination Thresholds (2016), light and glare impacts may be significant if the project would meet one or more of the following thresholds:

- The project would be moderate to large in scale, more than 50 percent of any single elevation of a building’s exterior is built with a light reflectivity greater than 30 percent (per LDC Section 142.07330(a)), and the project is adjacent to a major public roadway or public area.

- The project would shed substantial light onto adjacent, light-sensitive property or land use, or emit a substantial amount of ambient light the nighttime sky.

5.5.7.2 Impact Analysis

Wayfinding, safety/security, and landscape/architectural accent lighting would be installed on the project site, where none currently exist, as part of the project. All lighting would comply with SDMC Section 142.0740, *Outdoor Lighting Regulations*, which require the minimization of negative impacts from light pollution including light trespass, glare, and urban sky glow. Exterior lighting would be directed away from the adjoining properties and shielded to reduce impacts to the adjacent light-sensitive uses and public ROW. The new traffic signal and street lighting at the project entrance would also be required to comply with the outdoor lighting regulations. Lighting sources would be required to comply with the City's standards for low-sodium bulbs to protect the nighttime sky, and intense and visible security or flood lighting is strictly prohibited. The amount of window glazing on the exterior of the proposed church/sanctuary building would comply with SDMC Section 142.0730. Therefore, the project would not produce a substantial amount of light and glare affecting day or nighttime views in the area.

5.5.7.3 Significance of Impact

Compliance with the City regulations governing exterior lighting and glazing would ensure that less-than-significant impacts would occur due to light and glare.

5.5.7.4 Mitigation, Monitoring, and Reporting

No significant impacts from light and glare are identified; therefore, no mitigation measures are required.



Northbound view



Southbound view

Figure 5.5-1

Site Photographs from College Avenue



View 1

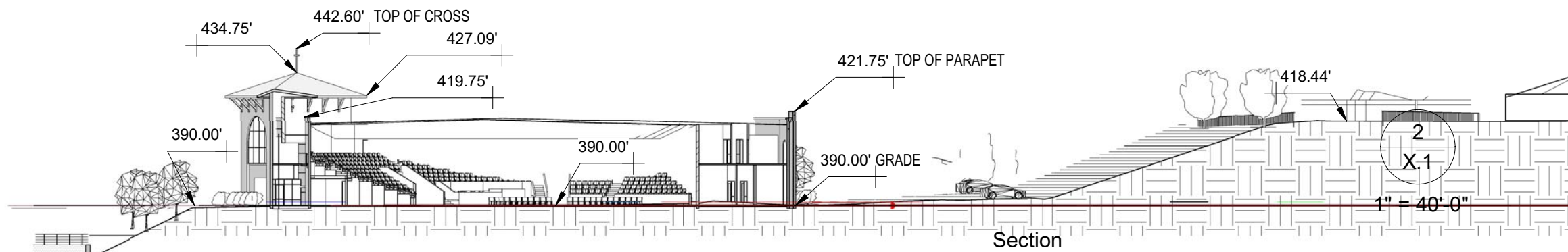
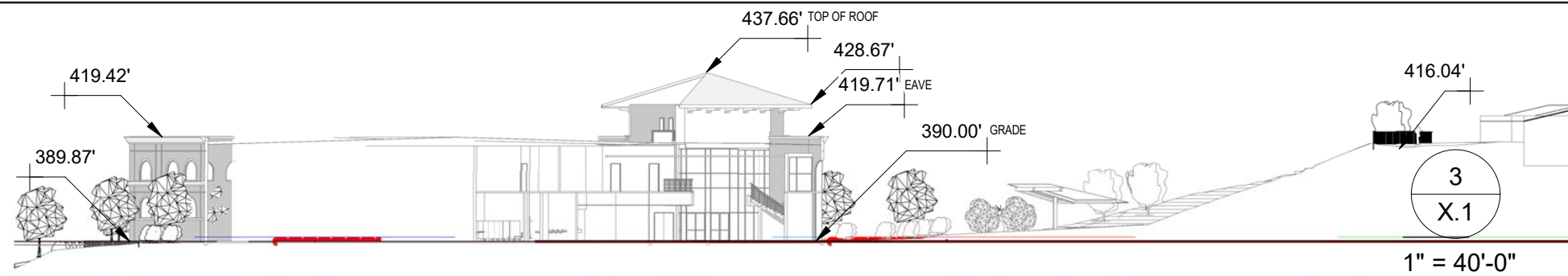


View 2

Figure 5.5-2

Site Photographs from I-8 Corridor

ALL PEOPLES CHURCH



Source: Kenneth D. Smith Architect & Associates 2021

Figure 5.5-3

Architectural Cross-Sections

ALL PEOPLES CHURCH



View near overpass



View near project property line



View near project entrance



View near surface parking



View of project entry



View near southwest property line

Source: 2021

Figure 5.5-4b

Project Visual Simulations - Southbound

ALL PEOPLES CHURCH

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5.6 Tribal Cultural Resources

This section of the Environmental Impact Report (EIR) evaluates potential tribal cultural resources (TCRs) impacts associated with the project. The analysis is based, in part, on the Phase I Cultural Resource Survey for the subject property prepared by Brian F. Smith and Associates Inc. in April 2016 and consultation with California Native American tribes traditionally and culturally affiliated with the project area who have requested consultation pursuant to Public Resources Code (PRC) Section 21080.3.1.

5.6.1 Existing Conditions

No TCRs are known to exist on the project site. Refer to Section 5.3, *Historical Resources*, of this EIR for a discussion of existing conditions related to the cultural setting of the project vicinity.

5.6.2 Regulatory Framework

5.6.2.1 The Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act is a federal law passed in 1990 that provides a process for museums and federal agencies to return certain Native American cultural items, such as human remains, funerary objects, sacred objects, or objects of cultural patrimony, to lineal descendants and culturally affiliated Indian tribes.

5.6.2.2 California Register of Historic Resources

State law also protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The California criteria for the California Register of Historic Resources (CRHR) are nearly identical to those for the National Register of Historic Places (NRHP). The State Historic Preservation Officer maintains the CRHR. Properties listed, or formally designated eligible for listing, in the NRHP are automatically listed in the CRHR, as are State Landmarks and Points of Interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys. A resource is eligible for listing in the CRHR if the State Historical Resources Commission determines that it is a significant resource and that it meets any of the following NRHP criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. It is associated with the lives of persons important in our past;
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; and/or
4. It has yielded, or may be likely to yield, information important to the prehistory or history.

Resources less than 50 years old generally are not considered for listing in the CRHR but may be considered if it can be demonstrated that sufficient time has passed to understand the historical importance of the resource.

5.6.2.3 Native American Historic Resource Protection Act

The Native American Historic Resource Protection Act (California PRC Section 5097 et seq.) addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction. It establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project. The Native American Historic Resource Protection Act establishes the Native American Heritage Commission (NAHC) as the authority to resolve disputes regarding the disposition of such remains.

5.6.2.4 California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act was enacted in 2001 (California Health and Safety Code Section 8010 et seq.). It requires all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items to complete an inventory and summary of these remains and items on or before January 1, 2003. The California Native American Graves Protection and Repatriation Act also provides a process for the identification and repatriation of these items to the culturally affiliated tribes.

5.6.2.5 California Health and Safety Code

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment of disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County coroner has examined the remains. California PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the California NAHC within 24 hours. The NAHC will notify the Most Likely Descendant. With the permission of the landowner, the Most Likely Descendant may inspect the site of the discovery. The inspection must be completed within 48 hours of notification of the Most Likely Descendant by the NAHC. The Most Likely Descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains, and items associated with Native Americans.

5.6.2.6 Assembly Bill 52

Assembly Bill 52 (AB 52), the Native American Historic Resources Protection Act, applies to projects that file a notice of preparation for an EIR or notice of intent to adopt a negative or mitigated negative declaration on or after July 1, 2016. AB 52 adds TCRs to the specific cultural resources protected under the California Environmental Quality Act (CEQA). Under AB 52, a tribal cultural resource is defined as a site, feature, place, cultural landscape (must be geographically defined in terms of size and scope), sacred place, or object with cultural value to a California Native American tribe that is either included or eligible for inclusion in the California Register or included in a local register of historical resources. A Native American tribe or the lead agency, supported by substantial evidence, may choose at its discretion to treat a resource as a tribal cultural resource. AB 52 also mandates lead agencies to consult with tribes, if requested by the tribe, and sets the principles for conducting and concluding consultation.

5.6.2.7 City of San Diego General Plan

Historic Preservation Element Policy HP-A.5.e in the City of San Diego (City) General Plan states that Native American monitors should be included during all phases of the investigation of archaeological resources. This would include surveys, testing, evaluations, data recovery phases, and construction monitoring.

5.6.3 Impact 1: Tribal Cultural Resources

The City has not yet prepared Significance Determination Thresholds for potential impacts to TCRs. Therefore, for purposes of this analysis, guidance provided by issue questions listed in CEQA Guidelines Appendix G are used to evaluate the potential for significant impacts to TCRs, as presented below.

- Issue 1: Would the project result in a substantial adverse change in the significance of a tribal cultural resource, defined I Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geologically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
- a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? or**
 - b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

5.6.3.1 Impact Analysis

AB 52 requires meaningful consultation with California Native American tribes on potential impacts to TCRs, as defined in PRC Section 21074. TCRs are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the CRHR or local register of historical resources.

In accordance with the requirements of PRC Section 21080.3.1, the City provided formal notification to the Lipay Nation of Santa Ysabel, Jamul Indian Village, and San Pasqual Band of Mission Indians, all of which requested consultation and agreed that construction monitoring should be conducted by a Native American monitor. The project site does not contain recorded sites listed or sites eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined by the PRC. Although TCRs have not been identified in the project area, the area is considered sensitive for potential TCRs. Therefore, there is the potential for the inadvertent discovery of a resource that could be impacted by project implementation.

5.6.3.2 Significance of Impacts

No prehistoric cultural resources were recorded or observed at the project site. However, ground disturbance associated with the construction of the project has the potential to uncover previously unknown TCRs, resulting in a potentially significant impact.

5.6.3.3 Mitigation, Monitoring, and Reporting

With implementation of **Mitigation Measure HR-1**, as described in Section 5.3, *Historical Resources*, impacts associated with TCRs would be reduced to a less-than-significant level.

6. CUMULATIVE IMPACTS

California Environmental Quality Act (CEQA) Guidelines Section 15130 requires that an Environmental Impact Report (EIR) address cumulative impacts of a project when its incremental effect would be cumulatively considerable. *Cumulatively considerable* means that the incremental effects of an individual project would be considerable when viewed in connection with the effects of past, current, or probable future projects.

According to CEQA Guidelines Section 15130, the discussion of cumulative effects “need not provide as great a detail as is provided of the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness.” The evaluation of cumulative impacts is to be based on either: “(A) a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or (B) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative effect. Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency.”

The basis and geographic area for the analysis of cumulative impacts is dependent on the nature of the issue and the project. In some cases, regional planning addresses cumulative impacts, while in other cases, the analysis takes into consideration more-localized effects. For the All Peoples Church Project (project), a plan approach is generally taken given the built-out and developed nature of the Navajo Community Plan area and, specifically, the Del Cerro neighborhood near the project site. However, the San Diego State University (SDSU) Master Plan proposes faculty/staff housing in the Adobe Falls portion of the Navajo community in the vicinity of the project and is taken into consideration in this cumulative impacts discussion, as appropriate. The timing and details of the Adobe Falls housing development are unknown at this time (SDSU 2007). **Figure 6-1, *Cumulative Setting***, illustrates the project’s proximity to the SDSU housing site in Adobe Falls.

Based on the analyses contained in Chapter 5, *Environmental Analysis*, the project’s impacts to biological resources, historical resources, noise and tribal cultural resources (TCRs) would be potentially significant prior to implementation of mitigation, while project impacts to land use and visual effects/neighborhood character would less than significant. The following is a discussion of whether or not these direct impacts would contribute to cumulative impacts and if that contribution is cumulatively considerable.

6.1 Effects Found to Be Not Cumulatively Considerable

6.1.1 Land Use

The project would amend the Navajo Community Plan to include a church use on a residentially designated parcel and require deviations from the RS-1-7 zone for building heights, wall heights, setbacks, and bicycle parking. The Community Plan Amendment (CPA) would be consistent with the goals and policies of the General Plan and community plan and any community plan specific amendment criteria; would provide additional public benefit to the community as compared to the

existing land use designation; and public facilities appear to be available to serve the project. Overall, the project reflects the goals and policies intended to support the General Plan policies and is consistent with the goals of the Navajo Community Plan, as described in Section 5.1, *Land Use*. In addition, the project would implement the goals and objectives of the Climate Action Plan by including energy and water efficient fixtures, and incorporating design features that would encourage bicycling, walking, and transit use. No conflicts with adopted environmental plans, such as the Environmentally Sensitive Lands (ESL) regulations and other San Diego Municipal Code (SDMC) requirements, would occur given the project's location outside of the Multi-Habitat Planning Area (MHPA) and compliance with the Biological Resources Guidelines requiring mitigation for habitat. A Planned Development Permit (PDP) is proposed that would allow for the religious assembly use within the RS-1-7 zone and would also allow approval of deviations from the development regulations of the zone. As described in Section 5.1, *Land Use*, the proposed deviations related to the project design features would result in a less-than-significant aesthetic impact, and as such, would not contribute to cumulatively considerable land use consistency impacts.

The project is proposed on an infill vacant site that is surrounded by development and major roads (i.e., Interstate 8 [I-8] and College Avenue) and would not introduce any barriers or project features that could physically divide an established community. The project would not result in land use impacts associated with an inconsistency with airport land use computability, and thus, would not contribute to a cumulative impact associated with airport land use consistency.

The proposed church would be compatible with the City's Noise Element of the General Plan and would not contribute to a cumulative impact regarding land use-noise compatibility. Because the local community is built out and no other current development projects or CPAs are occurring in the project area, the proposed change in allowable use would be a site-specific condition that would not combine with other land use changes in the project area and contribute to cumulative land use impacts. SDSU is proposing campus housing just north of I-8 and west of College Avenue, approximately one mile from the project site. The Adobe Falls campus is designated by the Navajo Community Plan as "Park," but slated for housing in the Campus Master Plan. The housing site is an undeveloped area that is not adjacent to or near the project site. The conversion of undeveloped land to residential use by SDSU would contribute to the land use changes in the community since both projects would involve the development of vacant lands. However, both projects would be implemented in accordance with adopted plans and policies. The project's land use impacts would be less than significant and, therefore, not be considered cumulatively considerable given its consistency with the City's land use plans and policies protecting environmental resources and character of the community. No mitigation is required.

6.1.2 Biological Resources

As described in Section 5.2, *Biological Resources*, the project would result in significant direct and indirect impacts to biological resources, all of which would occur outside of the MHPA. The Multiple Species Conservation Program (MSCP) was designed to compensate for the cumulative loss of biological resources throughout the San Diego region. Projects that conform to the MSCP as specified by the City's MSCP Subarea Plan and implementing ordinances, (i.e., Biology Guidelines and ESL Regulations) are not expected to result in a significant cumulative impact for those biological resources adequately covered by the MSCP. These resources include habitats identified as Tier I through IV and MSCP-Covered species (City of San Diego 2018a). Projects on the SDSU campus, such as the Adobe

Falls housing project, would have to comply with the biological resources mitigation framework in the Campus Master Plan Final EIR (SDSU 2007).

Future development in the City would comply with the City's Subarea Plan by conforming to the MHPA (i.e., the City's MSCP designated regional preserve) Land Use Adjacency Guidelines and Area Specific Management Directives for MSCP-Covered species (if later determined necessary) and by mitigating for significant impacts in accordance with ESL Regulations and the City's Biology Guidelines. Therefore, project development would not contribute to cumulatively significant impacts on sensitive biological resources in the city, and no mitigation for cumulative impacts would be required.

6.1.3 Historical Resources

No known archaeological sites of significance would be impacted by proposed development, as described in Section 5.3, *Historical Resources*. However, historical resources mitigation, in the form of monitoring, would be implemented during construction to avoid or reduce potential impacts to unknown subsurface resources to below a level of significance. Every project impacting undeveloped land that has the potential for unknown archaeological resources would undergo similar reviews in terms of determining the presence of historical (archaeological) resources and potential for unknown buried resources. Similar treatment of potential resources is anticipated for other projects in the city and on the SDSU campus (if applicable) during construction, ensuring no resources are destroyed without appropriate Native American contact. As a result, the project would not result in a cumulatively considerable contribution to the loss of regional historic resources, namely archaeological resources. No mitigation is required.

6.1.4 Noise

The project would result in less-than-significant operational noise impacts related to transportation noise on local roads and parking lot/circulation noise on site. Community-wide increases in transportation noise would occur along local roads and freeways with general population growth in the region. An analysis of the cumulative effects of the project's traffic in combination with existing and future traffic in the project area was performed in the noise impact assessment and memorandum contained in Appendix E (ECORP 2020; ECORP 2021). A project's contribution to a cumulative traffic noise increase could be considered substantial when the combined effect exceeds the perception level (i.e., auditory level increase) threshold or 3.0 decibels (dB) using the A-weighted sound pressure level (dBA). A comparison of the "Cumulative No Project" condition with the "Cumulative Plus Project" condition outlined in Table 5.4-6 was completed in the project-specific noise memorandum. As shown in **Table 6-1, Cumulative Traffic Noise Analysis**, the predicted increase in cumulative traffic noise levels associated with the project and other projects in the community, including the SDSU Adobe Falls housing development, during both the weekday and Sunday conditions would not exceed an increase of 3.0 dBA over cumulative conditions. As such, the project's contribution to increases in cumulative traffic noise in the project area would not be considerable and no mitigation is required.

**Table 6-1
CUMULATIVE TRAFFIC NOISE ANALYSIS**

Roadway Segment	CNEL @ 100 Feet from Roadway Centerline		Difference in CNEL between Cumulative No Project and Cumulative + Project	Cumulatively Significant Impact?
	Cumulative No Project	Cumulative + Project		
North of Del Cerro Boulevard	59.0	59.0	0.0	No
Between Del Cerro Boulevard and I-8 Westbound On-Ramp (adjacent to project site)	60.9	60.9	0.0	No
North of Canyon Crest Drive	Not Analyzed in Weekday	Not Analyzed in Weekday	N/A	N/A
South of Canyon Crest Drive	Not Analyzed in Weekday	Not Analyzed in Weekday	N/A	N/A
I-8 Westbound Off-Ramp (toward College Avenue)	61.4	61.4	0.0	No
I-8 Westbound	63.8	63.8	0.0	No
I-8 Eastbound	65.2	65.2	0.0	No
I-8 Eastbound Off-Ramp (toward College Avenue)	Not Analyzed in Weekday	Not Analyzed in Weekday	N/A	N/A
East of College Avenue	52.1	52.1	0.0	No
West of College Avenue	48.6	48.9	0.3	No
North of Del Cerro Boulevard	57.5	57.6	0.1	No
Between Del Cerro Boulevard and I-8 Westbound On-Ramp (adjacent to project site)	59.3	60.0	0.7	No
North of Canyon Crest Drive	62.1	62.2	0.1	No
South of Canyon Crest Drive	60.6	60.6	0.0	No
I-8 Westbound Off-Ramp (toward College Avenue)	62.2	62.2	0.0	No
I-8 Westbound	62.8	63.8	1.0	No
I-8 Eastbound	62.7	63.9	1.2	No
I-8 Eastbound Off-Ramp (toward College Avenue)	58.0	60.6	0.4	No
East of College Avenue	51.8	51.9	0.1	No
West of College Avenue	45.9	46.3	0.4	No

Source: ECRP 2021

Construction activities associated with the project would occur on an infill location not near any other construction projects in the area. Construction noise impacts primarily affect the areas immediately adjacent to a construction site and only during such activities. Although the project would have significant construction noise impacts on nearby sensitive receptors, which would require mitigation to comply with the City's Noise Ordinance limit, no other construction activities are anticipated in the project area at the same time. Therefore, the project's construction activities would not result in cumulatively considerable noise impacts and no mitigation is required.

6.1.5 Visual Effects and Neighborhood Character

Development of the project site would result in changes to the character of the project area, as described in Section 5.5, *Visual Effects and Neighborhood Character*. The analysis determined that the project would not block a designated public view corridor or a public viewing area of a public resource that is considered significant; would provide architectural and visual interest that would offset the exceedance of the building height limits of the RS-1-7 zone and retaining walls heights in the Land Development Code; would not strongly contrast with the surrounding development; would not impact any landmark trees; would not substantially change natural landforms; and would not result in excessive light and glare impacts to adjacent properties or roads. Given its architectural, landscape, and site design features that would minimize the visual effects of the project and its location on an infill vacant site that is surrounded by urban development and major roads, the project's visual impacts would be site-specific and would not combine with other changes to neighborhood character in the local community. The SDSU Adobe Falls campus is situated north of I-8 but farther to the west and at much lower elevation than the project site; thus, changes in visual character associated with both projects would not be collectively visible from the same local public vantage points. Compliance with General Plan Urban Design Element policies, as well as the development regulations in the SDMC, and policies in the Community Plan and in the mitigation framework in the SDSU Campus Master Plan Final EIR would ensure that the project's impacts to visual effects and neighborhood character would not lead to a cumulatively considerable visual impact that is significant. No mitigation is required.

6.1.6 Tribal Cultural Resources

As discussed in Section 5.6, *Tribal Cultural Resources*, the development of the project site has the potential to result in significant impacts associated with unknown subsurface TCRs. As required by Assembly Bill 52 (AB 52), lead agencies are required to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. The project has completed consultation as required by AB 52 and discussed in Section 5.6. The project includes implementation of mitigation, which requires construction monitoring during grading and ground disturbance. This mitigation would reduce project-specific TCR impacts to a less-than-significant level and as such, the project would not contribute to a significant cumulative TCR impact. Other projects in the city and on the SDSU campus would be required to comply with the requirements of AB 52, including implementing mitigation to reduce impacts if the potential for TCR impacts would occur. Therefore, cumulatively significant impacts to TCRs are not anticipated.

 Project Boundary
 San Diego State University
 Adobe Falls Campus



Aerial Photo: USDA NAIP 2020



Figure 6-1
Cumulative Setting

7. OTHER CEQA SECTIONS

7.1 Effects Found Not to Be Significant

California Environmental Quality Act (CEQA) Guidelines Section 15128 requires an Environmental Impact Report (EIR) to contain a statement briefly indicating the reasons that various possible effects of a project were determined not to be significant and were, therefore, not discussed in detail in the EIR. Based upon initial environmental review, the City has determined that the project would not have the potential to cause significant impacts associated with the following 15 issue areas:

- Agriculture and Forestry Resources
- Air Quality
- Energy
- Geologic Conditions
- Greenhouse Gas Emissions
- Health and Safety
- Hydrology
- Mineral Resources
- Paleontological Resources
- Population and Housing
- Public Services and Facilities
- Transportation
- Utilities and Service Systems
- Water Quality
- Wildfire

7.1.1 Agriculture and Forestry Resources

The City Significance Determination Thresholds (2020) state that a significant impact on agricultural resources may result from a project that involves the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use.

The project site is currently vacant. The project site and its surroundings are zoned for residential and other urban uses. The project site and its surroundings are classified as Urban and Built-Up Land by the Farmland Mapping and Monitoring Program (California Department of Conservation 2021), and no mapped farmland is located in close proximity to the project site. No agricultural production is occurring on the project site or surrounding properties. The proposed project would not conflict with existing zoning to protect agricultural resources or require the discontinuation of a Williamson Act Contract. Further, the project site is not zoned for forest land or timber use, nor do any existing forestry uses occur on the project site or in close proximity. No active agricultural activities are located adjacent to or in the vicinity of the project site. Therefore, implementation of the project would not impact agricultural or forestry resources.

7.1.2 Air Quality

The City Significance Determination Thresholds (2020) state that a significant impact on air quality may result from a project if it would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation;

- Expose sensitive receptors to substantial pollutant concentrations;
- Create objectionable odors affecting a substantial number of people;
- Exceed 100 pounds per day of particulate matter (PM) dust; and/or
- Result in a substantial alternation of air movement in the area of the project.

The San Diego Air Pollution Control District (SDAPCD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the San Diego Air Basin (SDAB) is in nonattainment. The SDAPCD and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. Strategies to achieve these emissions reductions are developed in the Regional Air Quality Strategy (RAQS) and State Implementation Plan (SIP), prepared by SDAPCD for the region. The County RAQS was initially adopted in 1991 with the most recent update completed in 2016 (SDAPCD 2016). The RAQS outlines the SDAPCD's plans and control measures designed to attain the state air quality standards for ozone. The RAQS relies on information from the California Air Resources Board (CARB) and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in San Diego County and the cities in the county, to project future emissions and then determine the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by San Diego County and the cities in the county as part of the development of their general plans.

As such, projects that propose development that is consistent with the growth anticipated by local plans would be consistent with the RAQS. However, if a project proposes development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might be in conflict with the RAQS and may contribute to a potentially significant cumulative impact on air quality. Population growth is typically associated with the construction of residential units or large employment centers.

In addition to impacts from criteria pollutants, project impacts may include emissions of pollutants identified by the State and federal government as toxic air contaminants (TACs) or hazardous air pollutants (HAPs). If a project has the potential to result in emissions of any TAC or HAP that may expose sensitive receptors to substantial pollutant concentrations, the project would be deemed to have a potentially significant impact.

The City of San Diego Significance Determination Thresholds (2020) has adopted emission thresholds based on the thresholds for an Air Quality Impact Assessment in the SDAPCD's Rule 20.2. These thresholds are shown in **Table 7-1, Significance Criteria for Air Quality Impacts**. For CEQA purposes, these screening level thresholds can be used to determine if a project's total emissions would result in a significant impact associated with air quality or health risk.

**Table 7-1
 SIGNIFICANCE CRITERIA FOR AIR QUALITY IMPACTS**

Pollutant	Emission Rate		
	lbs/Hr	lbs/Day	Tons/Year
Criteria Pollutants			
Carbon Monoxide (CO)	100	550	100
Oxides of Nitrogen (NO _x)	25	250	40
Respirable Particulate Matter (PM ₁₀)	—	100	15
Oxides of Sulfur (SO _x)	25	250	40
Lead and Lead Compounds	—	3.2	0.6
Fine Particulate Matter (PM _{2.5})	—	67	10
Volatile Organic Compounds (VOCs) ^a	—	137	15
Risk Type	Threshold Limit		
Health Risk – Toxic Air Contaminants			
30-Year Residential Cancer	10 in one million		
Non-Cancer Chronic Risk	1.0 Health Hazard Index		
Non-Cancer Acute Risk	1.0 Health Hazard Index		

Source: City of San Diego 2020; SDAPCD 2019.

^a VOC threshold based on South Coast Air Quality Management District levels, which have similar federal and state attainment status as San Diego.

With regard to evaluating whether a project would have a significant impact on sensitive receptors, air quality regulators typically define sensitive receptors as schools (i.e., preschool to 12th grade), hospitals, resident care facilities, daycare centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. SDAPCD issued supplemental health risk assessment (HRA) guidance in June 2015. The methodologies are presented in the SDAPCD's Supplemental Guidelines for Submission of Air Toxics "Hot Spots" Program Health Risk Assessments, California Air Pollution Control Officers Association (CAPCOA) Guidance Document, Health Risk Assessments for Proposed Land Use Projects (CAPCOA 2009), and the Office of Environmental Health Hazard Assessment (OEHHA) March 2015 Guidance Manual. Construction activities for the project were evaluated with regard to the standards in the SDAPCD guidance.

With regard to odor impacts, a project that proposes a use that produces objectionable odors would be deemed to have a significant odor impact if it would affect a considerable number of off-site receptors. The impacts associated with construction and operation of the project were evaluated for significance based on these significance criteria.

Impacts regarding fugitive dust would be significant if the project would result in the generation of 100 pounds or more on a daily basis.

Per the City's Significance Determination Thresholds, impacts regarding air movement would be significant if the project results in a substantial alteration of air movement in the area of the project.

The following discussion is based on the Air Quality Technical Study and Screening Health Risk Assessment prepared for the project by BlueScape Environmental (BlueScape Environmental 2021). A copy of the report is included as **Appendix G, Air Quality Technical Study and Screening Health Risk Assessment**, to this EIR.

7.1.2.1 Consistency with Regional Air Quality Strategy

The project would construct a church and parking structure, which would require an amendment to the Community Plan and a Planned Development Permit (PDP) to allow such a use on a residentially zoned property. Under the existing land use designations in the Navajo Community Plan and RS-1-7 zone, the project site can build up to 52 single-family residences, assuming a 5,000-square-foot (SF) lot minimum over the approximately 6-acre site. The project would produce less traffic on an average weekly basis than a residential use that would be consistent with the existing zoning for the project site. The amount of mobile and area source emissions produced by the project would be the same or less than the maximum emissions associated with a residential use of the site. While the project would require a Community Plan Amendment (CPA) to add “church” use to the Other Community Facilities figure in the Navajo Community Plan and a PDP, development of the site with the proposed institutional use would not be more intense from an emissions perspective than the residential use allowed under the existing zoning. Therefore, the project would be consistent with the growth anticipated by local plans, consistent with the underlying growth forecasts used in the development of the RAQS, and would not obstruct implementation of the RAQS. Less than significant impacts would result.

7.1.2.2 Violation of an Air Quality Standard

Construction. Construction of the project would generate temporary criteria pollutant and diesel particulate matter (DPM) emissions, primarily from operation of construction equipment on site and from vehicles transporting construction workers to and from the site. DPM emissions are discussed in more detail in Section 7.1.2.3 below. Construction equipment used for site preparation and grading typically generate the highest quantity of emissions. Construction emission calculations were based on the worst-case assumption that construction would commence as early as January 2022, with a duration of 12 months. A later construction start date and longer duration would yield lower emissions levels. Emissions from the construction of the project were estimated using the CalEEMod model version 2020.4.0 (BlueScape Environmental 2021). **Table 7-2, Estimated Maximum Daily Construction Emissions**, and **Table 7-3, Estimated Maximum Annual Construction Emissions**, provides the detailed daily and annual construction emission estimates, respectively, as calculated with the CalEEMod model. Construction emission calculations assumed water of exposed areas would occur up to three times per day, in accordance with the City's Grading Ordinance. Additional assumptions utilized in the construction emissions calculations included the use of Tier 4 engine standards for all construction equipment rated at 100 horsepower or more, and adjustments to select equipment default hours to be more consistent with the overall building phase scenario (refer to Appendix G for additional details regarding modeling assumptions). Watering of exposed areas three times a day and the use of Tier 4 engines would be a condition of approval on the project's grading permit.

Table 7-2
ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS

Construction Phase	Maximum Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2022 Maximum Day	14.2	49.5	32.6	0.22	12.7	5.76
<i>City of San Diego Screening Thresholds</i>	137	250	550	250	100	67
Threshold Exceeded	No	No	No	No	No	No

Source: BlueScape Environmental 2021.

Notes: See Appendix G for CalEEMod ver. 2020.4.0 computer model output for the construction emission estimates for the proposed development; the higher value of summer or winter, daily emissions, incorporating project design features to minimize emissions, are shown.

VOC= volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = oxides of sulfur; PM₁₀ = respirable particulate matter; PM_{2.5} = fine particulate matter.

Table 7-3
ESTIMATED MAXIMUM ANNUAL CONSTRUCTION EMISSIONS

Construction Phase	Maximum Emissions (tons/year)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2022 Annual	0.24	0.84	2.22	0.005	0.17	0.079
<i>City of San Diego Screening Thresholds</i>	15	40	100	40	15	10
Threshold Exceeded	No	No	No	No	No	No

Source: BlueScape Environmental 2021.

Notes: See Appendix G for CalEEMod ver. 2020.4.0 computer model output; annual emissions shown.

VOC= volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = oxides of sulfur; PM₁₀ = respirable particulate matter; PM_{2.5} = fine particulate matter.

As shown in Tables 7-2 and 7-3, construction of the project would not exceed the City's CEQA construction emission thresholds for daily or annual emissions of volatile organic compounds (VOC), oxides of nitrogen (NO_x), carbon monoxide (CO), oxides of sulfur (SO_x), respirable particulate matter (PM₁₀), or fine particulate matter (PM_{2.5}). As such, air quality impacts from project-related construction activities would be less than significant.

Operations. Operational emissions include emissions from electricity consumption (energy sources), vehicle trips (mobile sources), area sources, landscape equipment, and evaporative emissions as the structures are repainted over the life of the project. The majority of operational emissions are associated with vehicle trips to and from the project site. Operational emissions calculations assumed the first year of project operation would be 2023.

Project design features applied in the CalEEMod model for operational emissions calculations included the use of architectural coatings that meet SDAPCD Rule 67.0.1 standards, current Title 24 Building Standards, low flow water fixtures and water-efficient irrigation systems, and a 50 percent reduction in solid waste to meet California's existing waste diversion requirements. These project design features would be included as part of project conditions of approval. **Table 7-4, Estimated Daily Operational Emissions**, and **Table 7-5, Estimated Annual Operational Emissions**, summarizes daily and annual emissions, respectively, associated with the operation of the project.

**Table 7-4
ESTIMATED DAILY OPERATIONAL EMISSIONS**

Proposed Project	Estimated Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area	1.27	<0.001	0.013	<0.001	<0.001	<0.001
Energy	0.019	0.169	0.142	0.001	0.013	0.013
Mobile	4.38	3.77	31.4	0.055	5.49	1.49
Daily Total	5.67	3.94	31.5	0.056	5.50	1.50
<i>SDAPCD Thresholds</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>
Threshold Exceeded?	No	No	No	No	No	No

Source: BlueScape Environmental 2021.

Note: See Appendix G for CalEEMod ver. 2020.4.0 computer model output; the higher value of summer or winter, daily emissions, incorporating project design features to minimize emissions, are shown.

VOC= volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = oxides of sulfur; PM₁₀ = respirable particulate matter; PM_{2.5} = fine particulate matter.

**Table 7-5
ESTIMATED ANNUAL OPERATIONAL EMISSIONS**

Proposed Project	Estimated Emissions (tons/year)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area	0.23	<0.001	0.001	<0.001	<0.001	<0.001
Energy	0.003	0.031	0.026	<0.001	0.002	0.002
Mobile	0.20	0.18	1.47	0.003	0.26	0.07
Annual Total	0.43	0.21	1.49	0.003	0.26	0.07
<i>SDAPCD Thresholds</i>	<i>15</i>	<i>40</i>	<i>100</i>	<i>40</i>	<i>15</i>	<i>10</i>
Threshold Exceeded?	No	No	No	No	No	No

Source: BlueScape Environmental 2021.

Note: See Appendix G for CalEEMod ver. 2020.4.0 computer model output; annual emissions, incorporating project design features to minimize emissions, are shown.

VOC= volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = oxides of sulfur; PM₁₀ = respirable particulate matter; PM_{2.5} = fine particulate matter.

As shown in Tables 7-4 and 7-5, the project's estimated daily and annual operational emissions would not exceed the SDAPCD thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. Therefore, the project would not result in regional air quality impacts (including impacts related to criteria pollutants and violations of air quality standards). Impacts would be less than significant.

The nonattainment status of regional pollutants is a result of past and present development within the SDAB, and this regional impact is cumulative rather than attributable to any one source. A project's emissions may be individually limited, but cumulatively considerable when taken in combination with past, present, and future development projects. The thresholds of significance are relevant to whether a project's individual emissions would result in a cumulatively considerable incremental contribution to the existing cumulative air quality conditions. If a project's emissions

would be less than those threshold levels, the project would not be expected to result in a considerable incremental contribution to the significant cumulative impact.

As discussed above, the project would not result in the generation of criteria air pollutant emissions that would exceed the SDAPCD thresholds adopted by the City for construction and operational activities; therefore, it would not contribute a considerable amount of criteria air pollutant emissions to the region's emissions profile and would not impede attainment and maintenance of ambient air quality standards.

7.1.2.3 Sensitive Receptors

Emissions of DPM from equipment used to construct the project were analyzed to determine if the health risk impacts to nearby sensitive receptors (including schools, hospitals, daycare, parks, etc.) would exceed the City thresholds (identified in Table 7-1). Additionally, while residential uses are not typically identified as sensitive receptors, this analysis includes an examination of DPM emissions at the residential uses adjacent to the project site. Single-family residential uses are located directly adjacent to the east of the project site and across College Avenue to the west. The nearest school is the Temple Emanu-El preschool situated at 6299 Capri Drive, across College Avenue and approximately 300 feet north of the project site, while Hearst Elementary School is located approximately 0.1 mile northwest of the project site, at 6230 Del Cerro Boulevard. The closest hospital is Alvarado Hospital Medical Center, located south of Interstate 8 (I-8), at 6655 Alvarado Road, approximately 0.4 miles southeast of the project site. Temple Emanu-El preschool and Hearst Elementary School are the nearest sensitive receptors to the project site.

A screening HRA (BlueScape Environmental 2021) was prepared for the project and is included in Appendix G. Detailed information regarding the assumptions and methodology for the health risk assessment, including assumptions related to the generation of DPM emissions, the modeling software and modeling inputs, and risk calculation methodology are described therein. The health risk assessment calculated cancer risk, chronic risk, and acute risk for resident, child, and school receptor exposures. As explained in more detail in Appendix G, due to the short-term construction period and the sensitivity of the youngest age groups (third trimester pregnancy and 0–2 years) to cancer risk impacts, the analysis of health risks for the younger age groups provides the most conservative estimate of cancer risk health impacts. Thus, the younger age groups were used to calculate the cancer risk impacts, even though these age groups would not be present at the elementary school (which typically has children ages 5–12).

Table 7-6, Screening Health Risk Assessment Results, Diesel Particulate Matter Due to Construction, identifies the calculated cancer risk, non-cancer chronic risk, and acute risk impacts at the Maximally Exposed Individual (MEI) for residents in the vicinity of the project site and for the Temple Emanu-El preschool and Heart Elementary School, which are the nearest schools to the project site.

As shown in Table 7-6, the health risk impacts from construction DPM would not exceed the SDAPCD CEQA significance thresholds adopted by the City. Therefore, the project's construction-related health risk impacts at the nearest sensitive receptors, including residents adjacent to the project site, Temple Emanu-El preschool, and Hearst Elementary School, would be less than significant.

**Table 7-6
SCREENING HEALTH RISK ASSESSMENT RESULTS, DIESEL PARTICULATE MATTER DUE TO CONSTRUCTION**

Risk Type	Receptor Type	UTM Location (meters)	Risk Results	Significance Threshold	Exceeds Threshold?
Cancer Risk	Resident, Child	Rec. # 1273 494112.50; 3627012.50	9.70 in one million	10 in one million	No
	School (Temple Emanu-El Preschool)	Rec # 1587 494087.50; 3627162.50	1.02 in one million		No
	School (Hearst Elementary)	Rec # 1747 494037.50; 3627237.50	0.29 in one million		No
Chronic Risk	Resident, Child	Rec. # 1273 494112.50; 3627012.50	0.14	1.0 Health Hazard Index	No
	School (Temple Emanu-El Preschool)	Rec # 1587 494087.50; 3627162.50	0.001		No
	School (Hearst Elementary)	Rec # 1747 494037.50; 3627237.50	0.0004		No
Acute Risk	Resident, Child	Rec. # 2797 494121.36; 3627047.71	0.15	1.0 Health Hazard Index	No
	School (Temple Emanu-El Preschool)	Rec # 1587 494087.50; 3627162.50	0.05		No
	School (Hearst Elementary)	Rec # 1747 494037.50; 3627237.50	0.028		No

Source: BlueScape Environmental 2021.
Note: UTM = Universal Transverse Mercator

7.1.2.4 Odors

The project may temporarily produce odors during construction activities resulting from construction equipment exhaust, application of asphalt, and/or the application of architectural coatings; however, standard construction practices would minimize the odor emissions and their associated impacts. Furthermore, odors emitted during construction would be temporary, short-term, and intermittent in nature, would cease upon the completion of the respective phase of construction, and generally occur at magnitudes that would not affect a substantial number of people. As the project consists of an institutional use, no operational odor sources are proposed. Accordingly, the project would not create objectionable odors affecting a substantial number of people during construction, and short-term impacts would be less than significant.

7.1.2.5 Particulate Matter

As discussed in Section 7.1.2.2 above, the project would not result in emissions of particulate matter in excess of SDAPCD established thresholds. Estimated maximum daily construction emissions of particulate matter are 12.7 pounds of PM₁₀ and 5.76 pounds of PM_{2.5}. Estimated daily operational

emissions of particulate matter are 5.5 pounds of PM₁₀ and 1.5 pounds of PM_{2.5}. Thus, as demonstrated in Tables 7-2 and 7-4, the project would not result in the emissions exceeding 100 pounds per day of particulate dust. Impacts would be less than significant.

7.1.2.6 Air Movement

Air movement impacts are typically associated with the placement of high structures in proximity to one another that can result in the tunneling of air movement. The pitched roof towers of the building would extend from 45 to up to 48 feet above grade and the rooftop extension (i.e., cross) would extend an additional 8 feet above the 45-foot-high tower, for a total structure height of 53 feet above grade. The roof-top deck of the structured parking garage would be at grade with College Avenue. The project does not propose multiple high structures, nor is it located in an area that has existing multiple high structures. Adjacent land uses consist of a residential neighborhood, with nearby commercial and institutional uses (a temple and school), none of which are high profile or large structures that would contribute to air movement impacts. Air movement and air flow patterns would not be substantially altered as a result of the project and impacts would be less than significant.

7.1.3 Energy

Pursuant to CEQA Guidelines Appendix F, energy conservation impacts were analyzed by estimating project energy requirements by amount and type, then evaluating project compliance with energy regulatory requirements. These data were used to evaluate the project's effects on energy resources and the degree to which the project would comply with existing energy standards. A project may result in a significant energy impact if it meets one or more of the following criteria:

- If the project would result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation; and/or
- If the project would conflict with or obstruct a state of local plan for renewable energy or energy efficiency.

The analysis included in this section uses the CalEEMod Version 2020.4.0 results from the project's Climate Action Plan (CAP) Consistency Checklist Appendix to evaluate energy impacts (refer to **Appendix B**).

7.1.3.1 Energy Usage

Construction. Temporary electrical power would be needed during construction activities. Electricity demand during construction is limited, and generally includes demand for lighting and electronic equipment, such as computers inside temporary construction trailers. Electricity for construction would be provided by San Diego Gas & Electric (SDG&E). The amount of electricity used during construction would be minimal and associated with the use of construction trailers that are used by managerial staff during the hours of construction activities, and electricity associated with powered hand tools.

The largest source of energy consumption during project construction would be from petroleum-based fuels. Fuel consumed by construction equipment would be the primarily energy resource expended over the course of construction, while transportation of construction materials and construction worker commutes would also result in petroleum-based fuel consumption. Heavy-duty equipment and haul trucks involved in hauling materials during project construction would rely on diesel fuel. In contrast, construction workers would travel to and from the project site in gasoline-powered passenger vehicles. There would be no unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities or use of equipment that would not conform to current emissions standards (and related fuel efficiencies).

Both types of energy used during construction of the project would be limited to the construction period and would not involve long-term electrical or petroleum use. As such, energy consumption during construction activities would not be considered excessive, inefficient, or unnecessary.

Operations. The California Energy Commission reported SDG&E electrical demand for all uses in 2019 was 17,720.76 million kilowatt-hours (kWh) (California Energy Commission 2021). The project would generate the demand for approximately 569,882 kWh/year of electricity use (CalEEMod run by BlueScape Environmental 2021; see CAP Consistency Checklist, Appendix B). This equals approximately 3/1,000th of 1 percent of the total energy demand reported by SDG&E in 2019. Electricity use at the project would not be excessive, would be commensurate with the proposed use, and would not result in a substantial increase in regional consumption. The project would adhere to Title 24 requirements and the City's CAP and would incorporate several measures directed at minimizing energy use, including cool/green roofs; electric vehicle charging stations; designated and secure bicycle parking spaces; designated parking spaces for low-emitting, fuel-efficient, and carpool/vanpool vehicles; and implementation of a solid waste recycling plan.

Natural gas would be directly consumed throughout the operation of the project, primarily through building and water heating. Natural gas consumption was estimated for the project based on the CalEEMod default values. The California Energy Commission reported natural gas demand in 2019 for SDG&E for all uses to be 533.9 million therms (California Energy Commission 2021), or 5.339 billion kBtu (1 therm is equivalent to approximately 10 thousand British thermal units [kBtu]). The project is estimated to consume approximately 627,564 kBtu of natural gas per year during operations (CalEEMod run by BlueScape Environmental 2021; see CAP Consistency Checklist, Appendix B). This represents approximately 0.01 percent of total consumption of natural gas by SDG&E for all uses in 2019. In addition, the project would be designed to comply with California Code of Regulations (CCR) Title 24, Part 6, as well as the City's CAP. As such, the project's long-term demand for natural gas would be commensurate with the planned residential land use, would not be substantial, and would not cause the use of large amounts of natural gas in a manner that is wasteful or otherwise inconsistent with adopted plans or policies.

Operational petroleum usage would be attributable to the additional vehicles that would be associated with on-site employees and attendees to various small groups at the facility during weekdays, and with employees, volunteers, and church attendee vehicle trips on weekends. As noted under Section 7.1.12, *Transportation*, the project is expected to generate an increase above existing levels of 280 average daily trips (ADT) during weekdays, and an increase above existing levels of 1,976 ADT during Sundays (**Appendix J**; LOS Engineering 2022). Although the project would result in an increase in petroleum use during operation compared to the existing conditions,

project-specific petroleum use would be expected to diminish over time as fuel efficiency improves and as a result of the project's proximity to transit connections, bicycle infrastructure, and pedestrian facilities (i.e., sidewalks).

Given the above considerations with regard to all sources of energy usage, operation of the project would not result in the use of excessive, wasteful, or inefficient amounts of electricity, natural gas, or petroleum and would not result in the need to develop additional sources of energy.

7.1.3.2 Energy Efficiency Policy Compliance

The federal, state, and local regulatory plans and policies regarding energy efficiency aim to reduce energy demand, impose emission caps on energy providers, establish minimum building energy and green building standards, transition to renewable non-fossil fuels, incentivize homeowners and builders, fully recover landfill gas for energy, and expand research and development. In accordance with CARB's Scoping Plan, the project includes sustainable building practices, such as the following features:

- Cool/green roofs
- Use of low-flow fixtures/appliances and low-flow irrigation
- Electrical vehicle charging stations
- Designated and secure bicycle parking spaces
- Designated parking spaces for low-emitting, fuel-efficient, and carpool/vanpool vehicles
- Implementation of a solid waste recycling plan

Additionally, the project would be required to include all mandatory green building measures under the California Green Building Standards (CALGreen) Code, and as specified in the CAP Consistency Checklist prepared for the project (refer to Appendix B to this EIR). Therefore, the project would be consistent with the CARB Scoping Plan measures through incorporation of stricter building and appliance standards.

The project is consistent with General Plan concepts such as increased walkability, enhanced pedestrian networks, and proximity to transit through the provision of pedestrian and bicycle-friendly components. These include the provision of new bicycle lane signage and striping, a 12-foot shared (for pedestrians and bicycles) contiguous sidewalk south of the project driveway, a 5-foot non-contiguous sidewalk north of the driveway, and the provision of bicycle parking and storage. The project would implement a waste management plan (WMP) directed at diverting solid waste, supporting the use of recycled materials, and promoting on-site recycling in accordance with citywide ordinances.

The project is consistent with the CAP as demonstrated in the project's CAP Consistency Checklist. Each of the applicable CAP strategies would be implemented by the project, including sustainable development features and green building practices. Refer to additional discussion under Section 7.1.5, *Greenhouse Gas Emissions*. Thus, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. No significant adverse environmental effects would result from the adoption of the project in terms of plan consistency or policy conflicts.

7.1.4 Geologic Conditions

Based on the City's Significance Determination Thresholds (2020), a project may result in a significant geologic hazards impact if it meets one or more of the following criteria:

- If the project would expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards;
- If the project would result in substantial increase in wind or water erosion of soils, either on or off the site; and/or
- If the project is located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-project-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

A project-specific geotechnical investigation was prepared for the project (*Updated Preliminary Geotechnical Investigation and Design Recommendations, Proposed Church Facility, APN 463-010-100, San Diego, California, 90212*, Advanced Geotechnical Solutions, Inc. 2020a). The results of this investigation are presented in this section. The complete preliminary geotechnical investigation report is contained in **Appendix F** to this EIR. The project site is located within the westernmost portion of the Peninsular Ranges Geomorphic Province of California, in an area underlain by younger marine and non-marine sedimentary rocks. A majority of the project site is mantled with pre-existing undocumented fill soils, locally underlain by young alluvium and older alluvium where a pre-development drainage was filled in (based on a review of historic aerials, the drainage was filled during grading activities in the mid- to late-1960s). The fill and alluvial soils are underlain to maximum depths explored by Tertiary-aged Stadium Conglomerate and Cretaceous-age Santiago Peak Volcanics. In addition, the project is mapped in the City's Seismic Safety Study as being in Geologic Hazards Category 52 corresponding to "other level areas, gently sloping to steep terrain, favorable geologic structure, low risk" (City of San Diego 2008b).

7.1.4.1 Unstable Geologic Conditions

Geologic Hazards. Based on a review of published geologic maps and reports, the project site is not located on any known active, potentially active, or inactive fault traces and thus, would not be subject to potential adverse effects associated with the rupture of a known earthquake fault at the project site. The nearest known active surface fault is the Silver Strand section of the Newport-Inglewood-Rose Canyon fault zone, located approximately 7.1 miles southwest of the site. Based on the City's Seismic Safety Study, the project site has favorable geologic structure. In the event of a major earthquake on regional faults or other significant faults in the Southern California and northern Baja California area, the project site could be subjected to moderate to severe ground shaking. With respect to this hazard, the site is considered low risk and comparable to other locations in the general vicinity. Additionally, seismic design of the proposed structures would be performed in accordance with guidelines currently adopted by the City, including California Building Code and seismic design parameters of the Structural Engineers Association of California. Implementation of proper engineering design and utilization of standard construction practices, to be verified at the building permit stage, would ensure that the potential for impacts associated with seismic ground shaking would be reduced to an acceptable level of risk. Therefore, impacts would be less than significant.

Liquefaction/Spreading/Subsidence. As noted previously, the project site is located within Geologic Hazards Zone 52 on the City's Seismic Safety Study Geologic Hazards Map, which is characterized as areas with favorable geologic structure and low risk. The project site is underlain by Santiago Peak Volcanics that consist of moderately hard to hard, metavolcanic bedrock and Stadium Conglomerate that consists of moderately hard, cobble conglomerate with a silty sandstone matrix. These geologic units are not susceptible to seismically induced liquefaction or settlement. Based on the dense nature of the formational materials underlying the site, the lack of a shallow groundwater table, and the proposed remedial grading associated with project construction that would remove loose, sandy soils from the site, the potential for seismically induced liquefaction is considered remote. Additionally, the susceptibility to earthquake-induced dynamic settlement is considered to be remote due to the presence of well consolidated/indurated formational materials underlying the site and the aforementioned removal of loose, sandy soils during remedial grading at the project site. Due to the dense underlying materials present at the project site, the potential for unstable geologic conditions, such as subsidence or lateral spreading is low. Proper engineering design and utilization of standard construction practices would ensure that impacts resulting from unstable geologic conditions, such as liquefaction, settlement, subsidence, or lateral spreading would not occur. Therefore, no seismic-related ground failure is anticipated on site and no impact would occur.

Landslides. No landslides or indications of deep-seated landsliding were observed at the site during field observations or during review of published geologic maps. The nearest known landslide is approximately 0.75 miles west of the project within exposures of Friars Formation, which are not present at the project site. Therefore, the risk to people or structures associated with a landslide hazard does not exist and no impact would occur.

Seiches. Seiches are periodic oscillations in large bodies of water such as lakes, harbors, bays, or reservoirs. The risk potential for damage to the project site caused by seiches is low due to the project's distance from large bodies of water. The risk to people or structures associated with inundation hazards caused by seiche is low. Therefore, impacts would be less than significant.

Unstable Soils. Due to the dense underlying materials present at the project site, the potential for unstable geologic conditions that would potentially result in on- or off-site impacts is low. Additionally, soil types at the project site consist of Diablo-Urban Land Complex and Sandy Loam, which are not considered expansive soils. The project, in accordance with the recommendations of the geotechnical investigation, would remove unsuitable soils (artificial fill, young alluvium, and weather older alluvium/bedrock) and the proposed structures would be placed on compacted fill overlying competent Older Alluvium, Stadium Conglomerate, or Santiago Peak Volcanics. Therefore, the risk associated with unstable soils, including expansive soils would be avoided.

Based on the discussion above, the project would not expose people or property to potentially substantial effects including the risk of life, injury, or death resulting from hazards such as earthquakes and seismic shaking, liquefaction, spreading, subsidence, landslides, unstable soils, or similar hazards. The project would incorporate geotechnical recommendations based on the site-specific geotechnical report, would incorporate proper engineering design and standard construction practices consistent with applicable regulatory requirements. As such, impacts associated with geologic hazards would be less than significant.

7.1.4.2 Soil Erosion

As presented in Section 7.1.7, *Hydrology*, and Section 7.1.14, *Water Quality*, drainage for the site would be adequately controlled through the implementation of best management practices (BMPs) during construction and operation such that substantial runoff would not occur. In the future, the project site would be developed with structures, hardscape, and landscaping. No soil would be exposed that could be subject to wind or water erosion. Therefore, the project would not result in a substantial increase in wind or water erosion, and less-than-significant impacts would occur.

7.1.5 Greenhouse Gas Emissions

According to the California Natural Resources Agency, “due to the global nature of greenhouse gas (GHG) emissions and their potential effects, GHG emissions will typically be addressed in a cumulative impacts analysis.” According to CEQA Guidelines Appendix G, the following criteria may be considered to establish the significance of global climate change for a project:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and/or
- Conflict with the City’s CAP or an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

As discussed in CEQA Guidelines Section 15064.4, the determination of the significance of GHG emissions calls for a careful judgment by the lead agency, consistent with the provisions in Section 15064. Section 15064.4 further provides that a lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:

- (1) Use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use. The lead agency has discretion to select the model or methodology it considers most appropriate, provided it supports its decision with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use; and/or
- (2) Rely on a qualitative analysis or performance-based standards.

Section 15064.4 also advises a lead agency to consider the following factors, among others, when assessing the significance of impacts from GHG emissions on the environment:

- (1) The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;
- (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
- (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

In December 2015, the City adopted a CAP that outlines the actions that the City will undertake to achieve its proportional share of state GHG emission reductions (City of San Diego 2015a). The CAP is a qualified plan for the reduction of GHG emissions, in accordance with CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP. In July 2016, the City adopted the CAP Consistency Checklist to provide a streamlined review process for the analysis of potential GHG impacts from proposed new development; checklist revisions were then implemented in July 2017. The CAP Consistency Checklist requires a three-step review of the project to determine consistency with the GHG projections and programs outlined in the City's CAP. For the applicable steps, the project has been found to be consistent with the CAP (Baranek Consulting Group 2021). The following summarizes that determination based on the various items included in the project's CAP Consistency Checklist (Appendix B to this EIR).

The project site is designated in the Navajo Community Plan for Residential land use and is zoned Residential (RS-1-7). The designation is for Very Low/Low Residential use at a density range of 0 to 9 dwelling units (DU) per acre. With minimum 5,000 SF lots, as allowed in the RS-1-7 zone, the project site could be developed with maximum construction of up to 52 DU on the approximately 6-acre site. The Navajo Community Plan does not provide a separate land use designation for churches or places of religious assembly. Instead, these types of community facilities are identified as "Church" on the Other Community Facilities map (Figure 24) of the Navajo Community Plan. The project requires approval of a CPA to add "Church" use to the Other Community Facilities map in the Navajo Community Plan, similar to other religious institutions in the community. The proposed CPA would retain the Residential land use designation and identify the site for Institutional (Church) uses. No rezone is proposed because churches are a permitted use in the RS-1-7 zone. With regard to Step 1 of the CAP Consistency Checklist, a quantification of estimated project emissions was prepared, using the CalEEMod v2020.4.0 model, to evaluate whether the project would result in equivalent or less GHG emissions than assumed in the CAP. State and federal GHG measures were assumed in the calculations consistent with the regulatory assumptions in the CAP, including 2019 Building Efficiency Standards, under Title 24; Pavley I, Low Carbon Fuel Standard, and advanced Clean Cars standards; and the City's goal of 50 percent solid waste diversion through recycling and waste reduction programs (refer to the Appendix B to this EIR for additional details regarding modeling assumptions).

Table 7-7, *Estimated Operational Greenhouse Gas Emissions, Planned Land Use Designation and Zoning – 52 Single-Family Homes*, and **Table 7-8**, *Estimated Operational Greenhouse Gas Emissions, Proposed Land Use Designation and Zoning – All Peoples Church Project*, summarize the estimated GHG emissions with the existing and proposed land use designations and zoning, respectively.

As shown in Tables 7-7 and 7-8, the project would result in annual operational GHG emissions that are lower than levels that would occur under the planned land use designation/zoning assumed in the CAP by 156.79 metric tons per year of carbon dioxide equivalent (CO₂e). The site's annual vehicle miles traveled (VMT) would be reduced by approximately 459,305 miles as compared to the planned land use designation/zoning assumed in the CAP. Therefore, the project would result in equivalent or less GHG emissions than assumed in the CAP compared to the planned land use and zoning and meets the requirements of Step 1 of the CAP Consistency Checklist.

**Table 7-7
ESTIMATED OPERATIONAL GREENHOUSE GAS EMISSIONS PLANNED LAND USE DESIGNATION AND ZONING – 52 SINGLE-FAMILY HOMES**

Emission Source	Annual Emissions (Metric tons/year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Operational Emissions				
Area Sources	76.87	0.05	0.004	79.38
Energy	159.67	0.007	0.002	160.40
Mobile Source	481.81	0.03	0.02	489.34
Solid Waste	6.20	0.37	0.00	15.36
Water Use	14.96	0.09	0.002	17.84
Construction Emissions (Amortized Over 20 Years)				
Construction Sources	13.52	0.003	0.00	13.62
Total	753.03	0.55	0.03	
TOTAL CO₂e Emissions				775.94

Source: CalEEMod run by BlueScape Environmental (2021); see Appendix B.

Note: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent.

**Table 7-8
ESTIMATED OPERATIONAL GREENHOUSE GAS EMISSIONS PROPOSED LAND USE DESIGNATION AND ZONING – ALL PEOPLES CHURCH PROJECT**

Emission Source	Annual Emissions (Metric tons/year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Operational Emissions				
Area Sources	0.002	0.00	0.00	0.002
Energy	173.07	0.01	0.002	173.79
Mobile Source	334.47	0.03	0.02	337.91
Solid Waste	31.52	1.86	0.00	78.09
Water Use	11.59	0.05	0.001	13.06
Construction Emissions (Amortized Over 20 Years)				
Construction Sources	16.12	0.003	0.00	16.30
Total	563.77	1.95	0.02	
TOTAL CO₂e Emissions				619.15

Source: CalEEMod run by BlueScape Environmental (2021); see Appendix B.

Note: CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent

With regard to Step 2 of the CAP Consistency Checklist, the project design would comply with the GHG reduction strategies in the CAP by featuring the following, as described in Chapter 3, *Project Description*, and would be included as part of project conditions of approval:

- Cool/green roofs
- Use of low-flow fixtures/appliances and low-flow irrigation
- Electrical vehicle charging stations
- Designated and secure bicycle parking spaces
- Designated parking spaces for low-emitting, fuel-efficient, and carpool/vanpool vehicles
- Implementation of a solid waste recycling plan

A Step 3 conformance evaluation is not required because the project does not require a land use designation amendment (i.e., the project site would remain in the residential land use designation), and Step 1 demonstrates the project would be consistent with the General Plan and the Navajo Community Plan.

Therefore, the project would be consistent with projected GHG emissions and GHG reduction strategies outlined in the City's CAP, or any other applicable plan, policy, or regulation adopted for the purpose of reducing emissions of GHGs. The project would not result in a significant impact relative to plans, policies, or regulations aimed at reducing GHG emissions. Impacts would, therefore, be less than significant.

7.1.6 Health and Safety

The City Significance Determination Thresholds (2020) require that the environmental review process include steps to disclose and address the safe removal, disposal, and/or remediation of hazardous materials in conformance with applicable federal, state, and local government standards. The City Significance Determination Thresholds also identify potential public safety/public health issues associated with projects that are: (1) located within and/or in close proximity to airports, flood-prone areas, or areas susceptible to brush fires; (2) susceptible to disease-carrying vector exposure, sewage spills, or electromagnetic field effects associated with electric transmission lines and communications facilities; and (3) in proximity to former or active underground storage tank sites, fuel-storage tank farms, sewage treatment plants, or areas where toxic chemicals may be stored. Based on the City's Significance Determination Thresholds (2020), a project may result in a significant health and safety impact if the project would:

- Expose people to toxic substances, such as pesticides and herbicides, some of which have long-lasting ability, applied to the soil during previous agricultural uses;
- Result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school;
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment;

- Impair implementation of, or physically interfere with an adopted emergency plan or emergency evacuation plan;
- Result in a safety hazard for people residing or working within two miles of a private airstrip or a private airport or heliport facility that is not covered by an adopted Airport Land Use Compatibility Plan;
- Result in a safety hazard for people residing or working in a designated airport influence area; and/or
- Expose people or structures to significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

7.1.6.1 Construction

Hazardous Materials Usage and Transport. Construction of the project may require the use of hazardous materials (fuels, lubricants, solvents, etc.), which would require proper storage, handling, use and disposal; however, the project would not routinely transport, use or dispose of hazardous materials. Accidental spills, leaks, fires, explosions, or pressure releases involving hazardous materials represent a potential threat to human health and the environment if not properly treated. Accident prevention and containment are the responsibility of the construction contractors, and provisions to properly manage hazardous substances and wastes are typically included in construction specifications. The contractor would be required to comply with applicable local, state, and federal regulations, regarding the use, storage, and disposal of hazardous materials and hazardous wastes. Therefore, adherence to the construction specifications and applicable regulations regarding hazardous materials and hazardous waste, including disposal, would ensure that construction of the project would not create a significant hazard to the public or the environment.

Hazardous materials would not be disposed of or released onto the ground, the underlying groundwater, or any surface water. Totally enclosed containment would be provided for all refuse. With implementation of these construction BMPs, potential impacts from the accidental release of hazardous materials during construction activities would not occur.

7.1.6.2 Operations

Hazardous Materials Usage and Transport. The project is institutional in nature and does not propose the use or transport of any hazardous materials beyond those used for ordinary maintenance and cleaning purposes (e.g., chemical reagents, solvents, fuels, paints, and cleansers). These materials would be used for building and grounds maintenance. Many of the hazardous materials used would be considered household hazardous wastes, common wastes, and/or universal wastes by the U.S. Environmental Protection Agency, which regards these types of wastes to be common to businesses and households and to pose a lower risk to people and the environment than other hazardous wastes when they are properly stored, transported, used, and disposed of. All hazardous materials generated, used, and stored on the project property would be managed in accordance with all relevant federal, state, and local laws, including the California Hazardous Waste Control Law (California Health and Safety Code Division 20, Chapter 6.5) and Hazardous Waste Control Regulations (22 CCR 4.5).

Hazardous Emissions. Given the institutional character of the project, operations would not create any sources of hazardous emissions that could affect the public. The closest schools to the project site are Hearst Elementary School, located approximately 0.1 mile northwest of the project site and a pre-school at Temple Emanu-El, located across College Avenue, approximately 300 feet north of the project site. Although the project site is located within 0.25 miles of two existing schools, as an institutional use with no stationary emissions sources, it would not emit any hazardous substances. Therefore, hazardous materials impacts related to hazardous emissions and the project's proximity to schools would be less than significant.

Listed Hazardous Materials Sites. EnviroStor is an online database search and GIS tool for identifying sites that have known contamination or sites where there may be reasons to investigate further. It also identifies facilities that are authorized to treat, store, dispose, or transfer hazardous waste. Based on review of the online EnviroStor database on the Department Toxic Substances Control website, there are no recorded hazardous materials sites within a mile of the project site (California Department of Toxic Substances Control 2021). Therefore, the project site and its surroundings are not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. and the project would not create a significant hazard to the public or the environment. No impact would occur.

Emergency Evacuation Plans. The City participates in the County's Unified San Diego County Emergency Services Organization and County of San Diego Operational Area Emergency Plan (County of San Diego 2018). Primary evacuation routes consist of the major interstates, highways, and prime arterials within San Diego County. Primary evacuation routes identified in the emergency plan nearest the project site include I-8, which is located just south of the project site, and Interstate 15 (I-15), which is located approximately 3 miles west of the project site. However, as noted in the emergency plan, specific evacuation routes would be determined based on the location and extent of the incident and would include as many predesignated transportation routes as possible (County of San Diego 2018). The project would not impair the implementation of, or physically interfere with, an adopted emergency response plan or evacuation plan. Off-site roadway improvements are proposed along College Avenue at the proposed site entrance. A full access private driveway would be constructed along College Avenue, with a new signalized intersection and turn lanes. Construction activities associated with the project entry would include creating a break and narrowing of the existing raised median, constructing a new southbound left-turn lane, striping of a northbound right-turn lane and installing a crosswalk. A new traffic signal would be installed at the completed intersection. A second private driveway access would also be added in the northern portion of the site, providing an additional access point to the site from College Avenue. An encroachment permit from the City would be required for those improvements. Traffic control would be implemented by the construction contractor (as required by the City) to ensure safe passage through the area while construction is occurring and to make sure emergency access is maintained in the project area. Once complete, the project would not interfere with any emergency response along College Avenue and less-than-significant impacts would occur.

Wildfire Hazard. The project site is surrounded on all sides by urban development, with the exceptions of a 2.0-acre City fee-owned open space dedicated parkland that is situated between I-8 and the project site and adjacent residential neighborhood with no interface with wildlands. Some undeveloped hillsides occur west of College Avenue but are bordered by I-8 to the south and residential development to the west and north (refer to Figure 2-2). According to the City of San

Diego Official Very High Fire Hazard Severity Zone (VHFHSZ) Map No. 20, the project site is located within a “VHFHSZ & 300' Brush Buffer” (City of San Diego 2009). As part of standard development procedures, the proposed development plans would be submitted to the City for review and approval to ensure that adequate emergency access is provided to and from the project site. The project would be constructed to comply with the City’s Fire Code and City requirements related to development within the VHFHSZ and would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Less than significant impacts are identified.

Airport Safety Hazards. The project site is located within the Airport Land Use Compatibility Overlay Zone (ALUCOZ) and Airport Influence Area (AIA) for Montgomery Field. Specifically, the project site is located within Review Area 2 of the AIA, which consists of locations within the airspace protection and/or overflight notification areas (County of San Diego 2010). Limits on the heights of structures, particularly in areas of high terrain, is the only restriction on land uses within Review Area 2. Although the project site is located in Review Area 2 for Montgomery Field, the City determined that an Airport Land Use Commission (ALUC) review of the project would be unnecessary because of its topographic location below surrounding land uses and low stature relative to the airspace restrictions. The project would not interfere with the operations of the airport and no associated safety impacts would occur. The project site is not located in the vicinity of a private airstrip, and no safety impacts associated with private airstrips would occur.

7.1.7 Hydrology

According to the City’s CEQA Significance Determination Thresholds (2020), a project may result in a significant impact to hydrology if the project would:

- Result in impervious surfaces and associated increased runoff;
- Result in a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes; and/or
- Develop within a 100-year floodplain as identified on Federal Emergency Management (FEMA) maps or impose flood hazards on other properties.

Information for the following discussion is based on the *Preliminary Drainage Study* (Pasco Laret Suiter & Associates 2021) and *Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP)* (Pasco Laret Suiter & Associates 2020), which are included as **Appendix H, Preliminary Drainage Study**, and **Appendix I, Stormwater Quality Management Plan**, of this EIR.

The project site is currently vacant, with no impervious surfaces. The project would result in excavation, grading, and the placement of fill to construct the proposed structures and associated surface parking. Construction of the project would result in approximately 2.46 acres of new impervious areas of the site, which would cover approximately 41 percent of the site. In the current condition, there are no impervious areas, so the project would result in an increase of impervious areas at the site of 2.46 acres. The project design includes several drainage facilities to accommodate identified runoff volumes and velocities within the site, including the placement of pervious pavement on approximately 19 percent of the site and the construction of four biofiltration basins. In the existing condition, the runoff rate for the 100-year peak flow rates is 118.26 cubic feet per second (cfs). The project, with the identified planned stormwater improvements, would result in

runoff rates for the 100-year peak flow rates of 115.23 cfs. As such, the project would not result in significant impacts associated with increased runoff rates due to new impervious surfaces.

Existing drainage at the site consists of sheet flows from the northeast portion to the southern property line and tends toward a natural drainage flowline at the bottom of the slope, adjacent to College Avenue. Off-site run-on enters the project site at three separate locations. The first location is an existing 36-inch reinforced concrete pipe (RCP) public storm drain main at the northern boundary of the project site (via an existing easement for storm drains to the City of San Diego), which is conveyed in a southerly direction through the project site and into California Department of Transportation (Caltrans) right-of-way (ROW) via an earthen drainage pathway prior to discharging to an existing 48-inch RCP (in the Caltrans ROW), which conveys flow under the I-8 off-ramp. An existing 18-inch RCP public storm drain (within an existing 10-foot-wide easement for storm drains to the City of San Diego) also discharges stormwater on to the project site at the eastern boundary, coming from Marne Avenue. Drainage flows westerly to its confluence with the earthen drainage channel discussed above and continues in a southerly direction towards the Caltrans headwall and 48-inch public RCP. An existing 30-inch RCP discharges stormwater onto the project site at the southwestern boundary of the project site from underground infrastructure and a grated inlet along College Avenue (in the Caltrans ROW). The discharge flows through an 18-inch public RCP pipe, outletting at a headwall on Caltrans ROW, adjacent to the project site, and flows into the project site where it enters an existing 15-foot-wide easement for storm drains to the City of San Diego. Runoff flows southeasterly and converges with the earthen drainage channel flow line, flowing from the project site into Caltrans ROW and ultimately discharging to the existing Caltrans 48-inch RCP, which continues under the I-8 off-ramp. All of the existing on-site stormwater that is generated by the project site flows toward the existing 48-inch storm drain near the southwest corner of the project site.

The project includes drainage improvements, including vacations of portions of existing easements for storm drains to the City of San Diego, and the creation of new easements for storm drains to the City of San Diego. Proposed storm drain easements would conform to the requirements of the City's Drainage Design Manual. The project includes the construction of underground pipe to route two of the existing outlets (discussed above) further down the site. Construction of the project includes a 36-inch RCP public off-site mainline storm drain that would connect to the existing 36-inch RCP at the northern boundary but would be rerouted underground down College Avenue (with no adverse effect to neighboring properties) and transition to a public 48-inch RCP after it turns on-site. Rerouting of the 36-inch RCP storm drain would require removal of 38.8 linear feet of existing storm drain, which would require vacation of the easement. The main 36-inch trunk line would be rerouted down northbound College Avenue and would turn on site just before the Caltrans ROW begins. This 36-inch RCP public storm drain would be centered on a 15-foot-wide proposed drainage easement to the City of San Diego as it goes underground. It would then transition to a public 48-inch RCP line (a portion of which would be in a new 15-foot storm drains easement to City of San Diego on site) after it turns on site and enters the first public cleanout on the project site. It would then parallel the Caltrans ROW on site, where it would transition from the proposed 15-foot-wide public storm drains easement to City of San Diego into the existing 15-foot-wide easement for storm drains to the City of San Diego.

At the southwest corner of the project site, an 18-inch public storm drain (with a proposed 15-foot public storm drain easement) is proposed within the private road on site to reroute the existing 18-inch RCP storm drain (located within a 10-foot easement for storm drains to the City of San

Diego). Rerouting of this storm drain would require removal of approximately 80 linear feet of 18-inch public RCP storm drain (with no adverse effects to neighboring properties) and vacation of a portion of the existing 10-foot easement for storm drains to the City of San Diego. The 18-inch RCP described above would be constructed to reroute the existing 18-inch storm drain to convey off-site stormwater runoff from the existing 18-inch public RCP storm drain downstream (from the neighborhood above the project site at Marne Avenue), through the proposed 15-foot easement for storm drains to the City of San Diego, before converging with the proposed mainline 48-inch RCP.

The new 48-inch public RCP would capture and convey off-site storm runoff that is discharged onto the project site in the existing condition and transport treated water from the project (via private drainage structures and pipe networks) from biofiltration basins 1-3, into a 10-foot-wide engineered earthen channel, dissipated by riprap. This engineered channel would be within the existing 15-foot easement for storm drains to the City of San Diego that would run along the existing drainage route at the southwest corner of the site, before entering the 19.87-foot-wide proposed easement for storm drains to the City of San Diego, where flows would be dissipated via rip-rap and would discharge along the existing flowline on site. This overland flowline then picks up the treated stormwater of biofiltration basin 4 (which is part of the project's private drainage infrastructure), before flowing over the project site property line into Caltrans ROW (mimicking the existing condition), following the natural overland drainage pathway before being picked up by the existing headwall and 48-inch storm drain in the Caltrans ROW that flows beneath I-8. All on-site and off-site runoff would have an ultimate discharge point at the off-site 48-inch RCP Caltrans storm drain that does under the I-8 offramp to College Avenue, just as it does in the existing condition.

Approximately 4.91 acres of the developed site runoff would drain to four biofiltration basins for water quality treatment and hydromodification management prior to discharging to the mainline storm drain. These biofiltration basins would detain and mitigate the 100-year storm event peak flow rate prior to discharging on site. Stormwater discharged from the biofiltration basins would move further downstream to the existing off-site Caltrans 48-inch storm drain system at the southern end of the project site. Stormwater discharged from the remaining 1.08 acres of slopes and self-mitigated areas on the project site would follow natural drainage paths or be conveyed via concrete brow ditches to the ultimate discharge point (the Caltrans 48-inch storm drain system) at the southern end of the site. Runoff was calculated for the 100-year storm events, using the Rational Method, where Q is the flow rate in cfs, C is the runoff coefficient (determined from Table A-1 of the City of San Diego Drainage Design Manual), I is rainfall intensity in inches per hour (in/hr), and A is the drainage basin area in acres. **Table 7-9, Summary of Overall 100-Year Storm Event Peak Flow Rates**, shows the 100-year storm event peak flow rates for the project site in the existing condition, the proposed condition (the project without the proposed biofiltration basins), and the proposed condition (the project with detention provided by the project's four biofiltration basins).

**Table 7-9
 SUMMARY OF OVERALL 100-YEAR STORM EVENT PEAK FLOW RATES**

Condition	Total Drainage Area Off Site and On Site	Q100 (cubic feet per second)	Time of Concentration (minimum)
Existing Condition	64.4	118.26	13.07
Proposed Condition (the project without the proposed biofiltration basins)	64.4	116.80	13.05
Proposed Condition (the project with detention provided by the project's four biofiltration basins)	64.4	115.23	13.05

Source: Pasco Laret Suiter & Associates 2021

Table 7-9 shows the existing and proposed hydrologic results at the outfall of the project site. The proposed condition, both without and with the detention provided by the project's four biofiltration basins has a peak flow (Q100) that is less than the existing condition. Additionally, **Table 7-10, On-Site and Off-Site Hydrological Conditions**, shows the hydrological conditions at the project site in the existing condition, the proposed condition (the project without the proposed biofiltration basins), and the proposed condition (the project with detention provided by the project's four biofiltration basins).

**Table 7-10
 ON-SITE AND OFF-SITE HYDROLOGICAL CONDITIONS**

Condition	Area (acres)	Q100 (cubic feet per second)	Time of Concentration (minimum)	V100 (feet per second)	Weighted C
Existing Condition	64.4	118.26	13.07	13.92	0.59
Proposed Condition (the project without the proposed biofiltration basins)	64.4	116.80	13.05	9.86	0.61
Proposed Condition (the project with detention provided by the project's four biofiltration basins)	64.4	115.23	13.05	9.77	0.61

Source: Pasco Laret Suiter & Associates 2021

As shown in Table 7-10, as a result of the detention provided by the four proposed biofiltration basins, the project would mitigate the 100-year storm event peak flow rate to below the existing condition. The proposed storm drain mainline would be sized to sufficiently convey the on-site and off-site 100-year storm event peak flow rate in the post development condition. There would be no negative impacts to adjacent properties. The project would not result in significant alteration of existing patterns, as the proposed improvements would ultimately discharge to the same location downstream of the project as the existing condition. As such, the project would not result in the substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes. Impacts would be less than significant.

The project site does not contain wetlands or jurisdictional areas and the project would not result in impacts to such resources. As such, the project would not result in the need for approvals related to Clean Water Act Sections 401 or 404.

The project site is not located within FEMA special flood hazard areas (FEMA 2021). No development is proposed as part of the project that would occur within the floodplain or result in flood-related impacts. No impact associated with 100-year floodplains would occur.

7.1.8 Mineral Resources

The City Significance Determination Thresholds (2020) indicate that a project could cause a potentially significant impact to mineral resources if it results in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. According to the Generalized Mineral Land Classification figure (Figure CE-6) in the Conservation Element of the City General Plan, the project site is designated as Mineral Resource Zone (MRZ-) 3 (City of San Diego 2008a). MRZ-3 areas contain mineral deposits, the significance of which cannot be evaluated from available data. As discussed in the Conservation Element, the City's high quality mineral resource areas are designated as MRZ-2. The project site is located adjacent to a developed residential neighborhood and is not suitable for mineral extraction, nor is it identified in the General Plan as an area of known mineral resource that would be of value to the region and the residents of the state. The project site has not been delineated on a local general, specific, or other land use plan as a locally important mineral resource recovery site, and no such resources would be affected with project implementation. As such, no impacts to mineral resources would occur.

7.1.9 Paleontological Resources

Based on the described City Significance Determination Thresholds (2020), impacts related to paleontological resources would be significant if a project would require excavation exceeding:

- Over 1,000 cubic yards (cy) of excavation extending to a depth of 10 feet or greater in a high-resource-potential geologic deposit/formation/rock unit; and/or
- Over 2,000 cy of excavation extending to a depth of 10 feet or greater in a moderate-resource-potential geologic deposit/formation/rock unit.

According to the geotechnical investigation prepared for the project (Advanced Geotechnical Solutions 2020a; Appendix F) the project site is underlain by the Santiago Peak Volcanic and Stadium Conglomerate formations. The Santiago Peak Volcanic is assigned a zero sensitivity for fossil resources, while the Stadium Conglomerate is assigned a high potential for fossil resources. As described in Section 3.2.4, *Grading Plan*, the project grading plan indicates that approximately 93 percent of the project site would be graded, with 16,500 cy of cut and 39,000 cy of fill (including 22,500 cy of import). The maximum depth of excavation would be 25.5 feet. Therefore, the project's grading permit would be conditioned to require paleontological monitoring during the initial cuts into Stadium Conglomerate formational materials due to exceeding the 10-foot-or-greater threshold of significance. Through compliance with the grading permit conditions, the project would result in less-than-significant impacts to fossil resources.

7.1.10 Population and Housing

The City has not adopted specific significance thresholds for addressing a project's population and housing impacts. However, CEQA Guidelines Appendix G indicates a project could have a significant impact on population and housing if it would:

- Induce substantial unplanned population growth in an area either directly or indirectly; and/or
- Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

The project is an institutional land use that would not result in new residents or increase population in the project area. The project would not extend road or infrastructure to an area that does not have public utilities. As such, the project would not directly or indirectly induce substantial population growth in the area. Additionally, the project site does not currently contain existing residences that would be demolished or displaced as a result of the project and the project would not necessitate the construction of replacement housing to offset the removal of existing homes. Therefore, population and housing-related impacts associated with the project would be less than significant.

7.1.11 Public Services and Facilities

The City Significance Determination Thresholds (2020) state that public services and facilities impacts may be significant if the project would have an effect upon, or result in the need for, new or altered government services in any of the following areas: police protection, fire/life safety protection, libraries, parks, or other recreational facilities. If so, the focus of the analysis should be on the physical impacts of construction for public service facilities, such as whether the project would (1) conflict with the community plan in terms of the number, size, and location of public service facilities; and/or (2) result in direct impacts from construction of proposed new public service facilities needed to serve the project. The significance of a project's impacts should be evaluated relative to construction of public service facilities, particularly whether the project would conflict with the community plan in terms of number, size, and location of public service facilities, as well as if direct impacts from construction of new facilities needed to serve the project would occur.

As noted in Section 5.1, *Land Use*, while the project would require a CPA to add "Church" use to the Other Community Facilities map in the Navajo Community Plan, the project would not alter the zoning or land use designation of the site. As such, the number, size, and location of public service facilities required to serve the site would not change, as noted below.

7.1.11.1 Fire-Rescue

The project site is located within the City of San Diego Fire-Rescue Department (SDFD) service area for fire protection and medical services. The City has 52 fire stations protecting more than 343 square miles and over 1.4 million residents (City of San Diego 2021c). According to the Public Facilities, Services, and Safety Element of the City's General Plan, for medical patients and small fires, the first-due unit should arrive within 7.5 minutes, 90 percent of the time from the receipt of the 911 call in fire dispatch. For serious emergencies, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911-call receipt in fire dispatch, 90 percent of the

time (City of San Diego 2021a). The fire station closest to the project site is Fire Station 31, located approximately 1.1 miles north of the project site. Fire Station 31 serves Grantville/Del Cerro and its surrounding areas, with a district of 6.3 square miles (City of San Diego 2021c). Station 31 houses Engine 31 and Medic 31.

Similar to other institutional uses in the city, implementation of the project would require fire and emergency medical services. The project would result in staff being present on the site during weekdays, with additional attendees present at the site on weekday evenings for various small group activities. Additionally, on weekends, staff, volunteers, and church guests would be present. The project would result in some increases in service calls and response times; however, the project would not require the construction of new public facilities related to fire or emergency medical services. SDFD would provide first responder and first responder paramedic services to the project from Fire Station 31. Additionally, the project would be constructed in accordance with applicable fire codes and City regulations. The project would also be required to pay development impact fees prior to issuance of building permits, a portion of which could support maintenance of fire protection and emergency response services provided by the City. The project would not necessitate the construction of additional fire protection facilities that would result in impacts on the environment. Therefore, project impacts related to the provision of local fire protection services would be less than significant.

7.1.11.2 Police Services

The City of San Diego Police Department (SDPD) would serve the proposed project. The project site is located within the SDPD's Eastern Division, which serves a population of 155,982 people and encompasses 47.1 square miles. The Eastern Division serves the neighborhoods of Allied Gardens, Birdland, College East, College West, Del Cerro, Kearny Mesa, Lake Murray, Mission Valley East, Qualcomm, San Carlos, Serra Mesa, and Tierrasanta. The Eastern Division Substation is located at 9225 Aero Drive, approximately 4.3 miles northwest of the project site (City of San Diego 2021d). The SDPD does not staff individual stations based on the number of sworn officers per 1,000 population ratio, but it does have a goal of maintaining 1.48 officers per 1,000 population ratio citywide. As the project is an institutional use that would serve existing residents of the city and would not bring more residents to the area (through the construction of housing or large employment-generating uses) the project would not affect the existing sworn officers per 1,000 population ratio.

In consultation with SDPD, through the Crime Prevention through Environmental Design Review, the project has been designed to comply with emergency access requirements, which would help to reduce the demands for police services. The project would introduce an institutional use to the site. Although this could result in an increase in service calls compared to the current vacant property, the project is located in an urbanized area that is currently served by the SDPD. Additionally, the SDPD has facilities and staffing in the project area to adequately serve the project; ongoing funding for police services is provided by the City General Fund; and no new facilities or improvements to existing facilities would be required. Therefore, potential project-related impacts to police services and facilities would be less than significant.

7.1.11.3 Parks and Recreation Facilities

The project is an institutional use that would not increase the demand on park and recreational facilities in the project area. The project would not include construction of future housing or induce growth that could increase demand for park facilities or recreational amenities in the area. No need for new or physically altered park and recreation facilities would occur as a result of the proposed project and no impact would occur.

7.1.11.4 Schools

The project site is located within the San Diego Unified School District (SDUSD), which serves over 121,000 students ranging from preschool through grade 12 in 226 educational facilities (SDUSD 2021). The project is an institutional use that would not generate students or increase the need for school facilities. Additionally, the project would not include construction of future housing or induce growth that could increase demand for schools in the area. No need for new or physically altered school facilities would occur as a result of the proposed project and no impact associated with schools would occur.

7.1.11.5 Libraries

Library services are provided in the project area by the San Diego Public Library. The project is an institutional use and would not result in the construction of future housing or induce growth that could increase demand for library services in the area. As such, the project would not result in the need for new or physically altered library facilities and no impact to library services would occur.

7.1.12 Transportation

The City has adopted the following significance determination thresholds for addressing a project's transportation impacts (2020). According to the adopted significance determination thresholds, a project could have a significant impact on transportation if it would:

- Conflict with an adopted program, plan, ordinance or policy addressing the transportation system, including transit, roadways, bicycle, and pedestrian facilities;
- Result in VMT exceeding thresholds identified in the City of San Diego Transportation Study Manual;
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and/or
- Result in inadequate emergency access.

A Local Mobility Analysis (LMA) (**Appendix J** to this EIR) was conducted for the project (LOS Engineering 2022). The purpose of the LMA is to determine if there are any effects caused by project traffic that would trigger roadway and other multi-modal improvements or if the project should contribute a fair share participation in planned improvements. The LMA evaluates and documents existing pedestrian, bicycle, and transit facilities and identifies any deficiencies in those facilities within a 0.5-mile distance of the site in the context of proposed improvements.

~~In addition to the proposed~~ Based on the recommendations contained in the LMA, the project would install a traffic signal and median improvements at the project's main entrance driveway along College Avenue, the project would construct and construct pedestrian and bicycle improvements along the site's frontage on College Avenue to facilitate access (refer to DEIR Chapter 3, Project Description, for a detailed description of the access improvements). From the northern project boundary down to the proposed signalized main project entrance driveway, a 5-foot non-contiguous sidewalk with a transition to the existing contiguous sidewalk north of the project and a buffered Class II bike lane would be installed. From the proposed signalized main project driveway down to the southern project boundary, a 12-foot shared contiguous sidewalk consisting of a 6-foot bike path and a 6-foot pedestrian path would be installed. Installation of the identified improvements would assure that the project would not conflict with the goals and objectives of the Mobility Element of the General Plan related to roadway network operations, safety, accessibility, and multi-modal connectivity (City of San Diego 2015). Thus, no significant transportation impact related to an adopted program, plan, ordinance or policy would occur.

~~Metropolitan Transit System lists Bus Routes 14 and 115 within a 0.5-mile walking distance from the project access. There are four bus stops within the 0.5-mile walking distance, with two on College Avenue just north of Del Cerro Boulevard, and two on College Avenue just south of Alvarado Road. Additionally, the San Diego State University trolley station is within a 1-mile walking distance of the project pedestrian access point. The Alvarado Road trolley station is over a 1-mile walking distance from the project site. Both stations are served by the Green Line trolley service operated by Metropolitan Transit Service (MTS).~~

~~The LMA analysis estimates that the project would generate 280 ADT, with 31 a.m. trips and 107 p.m. trips during the week and forecasts that the church would generate 1,976 ADT on Sunday when services are scheduled. The forecasted Sunday trip estimate is based, in part, on actual traffic counts taken at the three services offered at the church's existing location at 5555 University Avenue in San Diego, as adjusted for the proposed 900-seat capacity at the proposed location. The LMA addresses the effects of project traffic on intersections, street segments and freeway off-ramp queues in the project area. According to the analysis in the LMA, with the proposed traffic signal, median changes, sidewalk, and bike lane improvements in place, the project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system and no additional off-site improvements would be required; thus, a less-than-significant impact would occur.~~

~~A Vehicle Miles Traveled Analysis screening was prepared for the project (LOS Engineering 2021) and is contained in **Appendix K** to this EIR to address the project's potential for VMT impacts. As discussed above, the~~ The project would result in 280 weekday ADT, with 31 a.m. peak hour trips and 107 p.m. peak hour trips. On Sundays, the project would result in 1,976 ADT, with 690 Sunday peak hour trips (378 outbound after the 10 a.m. service and 312 inbound for the 11:30 a.m. service). The VMT screening criteria to determine if a detailed transportation VMT analysis is required is based on the City of San Diego *Transportation Study Manual* (City of San Diego 2020b), which states that a project that meets at least one of eight screening criteria could be presumed to have a less-than-significant VMT impact. The project meets the "small project" criteria, which defines a small project as one that generates less than 300 daily unadjusted driveway trips using the City of San Diego trip generation rates and procedures. The project satisfies this criterion because the unadjusted weekday driveway trips for the project are calculated as 280 ADT (LOS Engineering 2021). Therefore,

the project does not require a detailed transportation VMT analysis because the project's unadjusted daily driveway trips would be below the "small project" threshold of 300 daily unadjusted driveway trips contained in the *Transportation Study Manual*. As such, the project would be presumed to have a less-than-significant impact regarding transportation VMT.

The project would provide new vehicular access to the project site, with a full signalized access driveway along College Avenue. Additionally, a 24-foot right-in/right-out driveway would be located in the northern portion of the site. Each driveway would be designed consistent with City of San Diego standards, and as such, the project would not result in significant impacts regarding hazards due to design features. No significant impact would occur.

The project includes provisions for emergency response and evacuation by providing two points of access along College Avenue. A traffic control plan would be implemented as a condition of approval during construction activities to ensure that adequate access is maintained, to the satisfaction of the City Engineer. During long-term operation of the project, the two driveways along College Boulevard would be maintained, ensuring access for emergency response. No impact associated with inadequate emergency access would occur.

7.1.13 Utilities and Service Systems

According to the City's Significance Determination Thresholds (2020), public utility impacts may be significant if the project would:

- Result in the need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts, with regards to the following utilities: electrical power, natural gas, water, sewer, communication systems, and solid waste disposal;
- Use excessive amounts of water; and/or
- Use predominantly non-drought-resistant landscaping and excessive water usage for irrigation and other purposes.

With regard to the specific utility services affected by the project, the following discussion of water supply/conservation, water facilities, wastewater facilities and treatment, solid waste management, and electricity and natural gas is provided.

7.1.13.1 Water Supply/Conservation

Under Senate Bill (SB) 610 (codified in the Water Code beginning at Section 10910), a water supply assessment (WSA) must be furnished to cities and counties for inclusion in any environmental documentation of projects (defined in the Water Code) that propose to construct 500 DU or more of residential, or that will use an amount of water equivalent to what would be used by 500 DU of residential uses (such as a commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space), and are subject to CEQA. Under SB 221, approval by a city or county of certain residential subdivisions requires an affirmative written verification of sufficient water supply or water supply verification (WSV). A WSA evaluates the water purveyor's ability to provide water supplies to a project during normal water supply year, a single dry water year, and multiple dry water years over a 20-year projection period, in addition to existing and

planned future water demands within its jurisdiction. The project would result in the construction of a 54,476 SF church/sanctuary building, a parking garage, and landscaping, and would employ less than 50 people.

Based on the criteria contained in the Water Code, the project would not demand an amount of water equivalent to or greater than a 500 DU project, and as such, would not trigger the requirement for the preparation of a WSA (Water Code Section 10912). Regional water planning documents utilize zoning and land use designations to determine water demand and to ultimately determine the entitlements needed to provide adequate water supply. The project would not alter the zoning or land use designation of the site but would add the church use to the Other Community Facilities map of the Navajo Community Plan through an amendment. Therefore, the project would not result in a need to revise estimated regional water demands or alter existing entitlements and would not result in a need to alter existing water entitlements. A less-than-significant impact related to water supply entitlements would occur.

The project would minimize its demand for potable water by complying with the City's Land Development Code and CALGreen Code with regard to the installation of water conservation devices, such as low-flow toilets, showers, and faucets, and low-flow irrigation, as noted in the project's CAP Consistency Checklist (Appendix B) and would be included as part of project conditions of approval. In addition, the landscape plan contains drought-tolerant, native plants in its palette, which would further reduce the project's demand for potable water. Therefore, the project would not use excessive amounts of potable water and impacts associated with conservation would be less than significant.

7.1.13.2 Water Facilities

The project site is vacant but is located in an urban area which is served by the City of San Diego. The project would include construction of new on-site water infrastructure to extend water service to the project site. On-site improvements would include private water laterals connecting to the existing City facilities in the project area and off-site improvements would consist of public water infrastructure. A 320-linear-foot, 8-inch public water main extension would be installed along College Avenue to a point of connection at its intersection with Del Cerro Boulevard, within the College Avenue and Del Cerro Boulevard ROW. On-site improvements would include the installation of a 2-inch-diameter public domestic water service connection, an 8-inch-diameter private water line for fire service, and a 1-inch-diameter irrigation line. Water infrastructure would be designed and constructed in accordance with the criteria established by the City of San Diego's current water facility guidelines, regulations, standards, and practices. The project site is planned for future development and proposed in a developed, urban area already served by utility infrastructure. The impacts of constructing the new public water main line have been addressed in this EIR and no other off-site facilities would be required to provide water services to the project. The project would not require the construction of new water systems or require substantial alterations to existing water facilities such that the construction would create physical impacts. Impacts associated with water facilities would be less than significant.

7.1.13.3 Wastewater Facilities and Treatment

As discussed for water facilities above, the project would include the construction of new on-site wastewater infrastructure to extend wastewater services to the site. Although the project site is vacant, the project area is urbanized, and existing wastewater infrastructure is present in the area. Wastewater treatment is provided at the project site by the City of San Diego's Metropolitan Wastewater System. Wastewater produced on site would be pumped up to a private sewer discharge manhole, where it would gravity flow via a private 8-inch-diameter gravity flow sewer lateral to a private sewer lift station and private sewer force main which would connect through an adjacent private residential lot via a private sewer lateral to an off-site public sewer main in Marne Avenue. Project-related wastewater infrastructure would be designed and sized to meet the project's needs in accordance with the criteria established by the City of San Diego's current sewer facility design guidelines, regulations, standards and practices. As such, wastewater facilities and treatment impacts would be less than significant.

7.1.13.4 Solid Waste Management

A WMP was prepared for the project (**Appendix L**; Baranek Consulting Group 2020b). The WMP evaluates the project's anticipated construction and operational waste and assesses whether or not it would result in an impact on local solid waste management programs, policies and waste diversion goals. The City CEQA Significance Determination Thresholds for solid waste identify a threshold of 1,500 tons of waste or more during construction and demolition (C&D) for direct solid waste impacts, and 60 tons of waste or more during C&D for potentially significant cumulative solid waste impacts.

Construction activities would generate waste in the form asphalt and concrete, brick/masonry/tile, cardboard, carpet/ padding/foam, drywall, landscape debris, mixed C&D debris, roofing materials, scrap metal, unpainted wood and pallets, and garbage/trash. Construction debris would be separated on site into material-specific containers to facilitate reuse and recycling and to increase the efficiency of waste reclamation. Source separation at the construction site would (1) ensure appropriate waste diversion, (2) minimize costs associated with transportation and disposal, and (3) facilitate compliance with the City of San Diego's C&D Debris Deposit Ordinance. Construction activities are estimated to generate approximately 241 tons of waste.

During operation of the project, the church/sanctuary would generate approximately 56.4 tons of waste annually, not taking into account compliance with City regulations on diversion. The project would be required to provide exterior refuse and recyclable material storage areas in accordance with City regulations (San Diego Municipal Code Chapter 14, Article 2, Division 8, *Refuse and Recyclable Material Storage Regulations*), which would enable on-site recycling. Landscape maintenance would include the collection and diversion of green waste. Diversion activities during project occupancy would achieve a 40 percent diversion rate, resulting in 22.6 tons of waste diverted annually.

Based on the WMP estimates, the project would meet the 75 percent solid waste diversion rate for waste produced during the construction phases. The project would, however, fail to meet the 75 percent waste reduction target annually once the project is occupied. Nonetheless, the project would fall below the City's CEQA Significance Determination Threshold (generation of more than

1,500 tons of solid waste materials) for direct impacts to solid waste facilities during construction (i.e., 47.5 tons of construction materials to Miramar Landfill). Project operations would dispose of 33.8 tons of solid waste to Miramar Landfill which would not exceed the 60 or more tons of waste for cumulative impacts.

The project would implement the provisions of its WMP as part of the construction and operational phases to offset its cumulative contribution to solid waste quantities in the region. Therefore, the project would not adversely impact the permitted capacity at Miramar Landfill. Less than significant impacts would occur.

7.1.13.5 Electricity and Natural Gas

Electricity and natural gas to the project site would be provided by SDG&E. The construction of the project would include the placement of new underground electrical and natural gas infrastructure at the project site, which would connect with existing SDG&E infrastructure in the project vicinity. The project is located in an urbanized area where existing electrical and natural gas infrastructure is already extended. The project would not result in the need for new energy delivery systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts. Impacts associated with the provision of electricity and natural gas to the site would be less than significant.

7.1.14 Water Quality

According to the City's Significance Determination Thresholds, water quality impacts may be significant if the project would:

- Result in an increase in pollutant discharge to receiving waters during or following construction, or discharge identified pollutants to an already impaired water body; and/or
- Result in short-term and long-term effects on local and regional water quality.

Information for the following discussion is based on the *Preliminary Drainage Study* (Pasco Laret Suiter & Associates 2021) and *Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP)* (Pasco Laret Suiter & Associates 2020) for the project, which are included as **Appendix H, Preliminary Drainage Study**, and **Appendix I, Stormwater Quality Management Plan**, of this EIR.

Compliance with the water quality standards is ensured through permit conditions provided by Land Development Review Engineering for private projects (City of San Diego 2016). Adherence to the City's stormwater regulations is, thus, considered adequate to preclude surface water quality impacts. Accordingly, conformance with the City's stormwater regulations is the applicable threshold. If it is determined that BMPs are to be used to protect a specific environmental resource (e.g., biological resources) and these BMPs are above and beyond what is required to achieve compliance with the City's Water Quality Standards, the impacts would be considered significant and the BMPs should be regarded as mitigation measures.

The project site is situated within the Mission San Diego Hydrologic Unit (No. 907.11). Site runoff discharges on the southwest corner of the site, into an existing 48-inch concrete headwall that carries stormwater under I-8 and into Alvarado Creek. From Alvarado Creek, stormwater slows and

merges into San Diego River (Lower), and then flows into Famosa Slough and Channel. Stormwater ultimately flows into the Pacific Ocean Shoreline, San Diego Hydrologic Unit, at Stub Jetty, south of San Diego River outlet, near Cape May Avenue. Alvarado Creek is located approximately 500 feet downstream of the project site and is included in the most recent list of Clean Water Act Section 303(d) List of Water Quality Segments; Alvarado Creek is impaired for nitrogen. The existing beneficial uses of receiving waters downstream of the project discharge locations include agricultural supply; aquaculture; preservation of biological habitats; cold freshwater habitat; commercial and sport fishing; industrial service supply; marine habitat; migration of aquatic organisms; municipal and domestic supply; navigation; rare, threatened, or endangered species; non-contact water recreation; water contact recreation; shellfish harvesting; spawning, reproduction, and development; warm freshwater habitat; and wildlife habitat. Pollutants anticipated to occur at the project site include sediment, nutrients, trash and debris, and pesticides.

The infiltration feasibility condition for the project has been identified as a “no infiltration” condition for the proposed BMP biofiltration basins. This condition has been identified based on the existing and proposed grades of the site; the proposed development; depths of existing artificial fill; proposed BMP’s distance to slopes, underground utilities, structures, and retaining walls; and the negligible permeability of the underlying bedrock units (Advanced Geotechnical Solutions 2020b, included in Attachment 1 of the project SWQMP, Appendix I of this EIR).

The project site is divided into five Drainage Management Areas (DMAs). DMA-1 through DMA-4 would be treated for water quality and hydromodification. DMA-5 is self-mitigating and would not require water quality treatment or hydromodification. The project would use permeable pavement as Site Design BMPs, and biofiltration for permanent structural BMPs for DMA-1 through DMA-4. The project proposes four biofiltration basins that would provide stormwater quality treatment and hydromodification management for on-site runoff. On-site stormwater runoff would drain to the four biofiltration basins for water quality treatment and hydromodification management prior to discharging to the mainline storm drain. The DMAs, including total area, total impervious areas, total pervious areas, runoff factors, design capture volume, DMA type, and associated BMPs are summarized in **Table 7-11, Drainage Management Areas Summary**.

As discussed in Section 7.1.7, *Hydrology*, on-site stormwater runoff would be directed to the four biofiltration basins and then discharged into existing storm drains. The 36-inch RCP mainline storm drain is proposed to connect to the existing 36-inch RCP at the northern boundary, which would be rerouted underground down College Avenue, requiring vacation of the existing easement for storm drains to City of San Diego. This main 36-inch trunk line would be re-routed down northbound College Avenue and would turn on site just before the Caltrans ROW begins. This 36-inch RCP would be centered on a 15-foot proposed easement for storm drains to the City of San Diego, as it goes underground below the slope on site. It would then transition to a public 48-inch RCP line (a portion of which would be in a new 15-foot easement for storm drains on site to City of San Diego) after it turns on site and enters the first public cleanout on the project site. It would then parallel the Caltrans ROW on site, where it would transition from the proposed 15-foot easement for storm drains into the existing 15-foot-wide easement for storm drains to the City of San Diego. At the southwest corner of the project site, an 18-inch public storm drain (within a proposed 15-foot public easement for storm drains to the City of San Diego) is proposed within the private road on site to reroute the existing 18-inch RCP storm drain (within an existing 10-foot easement for storm drains to the City of San Diego). This improvement would require removal of approximately 80 linear feet

**Table 7-11
DRAINAGE MANAGEMENT AREAS SUMMARY**

Drainage Management Areas (DMAs)	Total Area (square feet)	Total Area (acres)	Total Impervious Area (acres)	Total Pervious Area (acres)	DMA Runoff Factor C^a	Design Capture Volume (cubic feet)	DMA Type	Structural BMP Type	Structure BMP Name
DMA-1	23,775	0.55	0	0.26	0.16	203	Drains to BMP	Biofiltration	BMP-1
DMA-2	27,352	0.63	0.04	0.09	0.17	242	Drains to BMP	Biofiltration	BMP-2
DMA-3	56,780	1.30	0.93	0.20	0.69	2,061	Drains to BMP	Biofiltration	BMP-3
DMA-4	106,108	2.44	1.49	0.78	0.63	3,515	Drains to BMP	Biofiltration	BMP-4
DMA-5	46,929	1.08	0	1.08	0.23	0	Self-Mitigating	Self-Mitigating	Not Applicable

Source: Pasco Laret Suiter & Associates 2021

Notes:

- ^a Area weighted runoff factor "c" calculated per Appendix B.1.1 of the City of San Diego BMP Design Manual (October 2018). All impervious surfaces were assigned a runoff factor of 0.90. All permeable pavement was assigned a runoff factor of 0.1. All landscape areas were assigned a runoff factor of 0.23, consistent with Type C soils.
- ^b 85th percentile rainfall, I = 0.63 inches.
- ^c Design capture volume (DCV) calculated per Appendix B.1 of the City of San Diego BMP Design Manual (October 2018). $DVC = (C \cdot I \cdot A) / 12$.

of the 18-inch public RCP storm drain. This would convey off site stormwater from the existing 18-inch public RCP storm drain downstream (from the neighborhood above Marne Avenue), through the proposed 15-foot public easement for storm drains to the City of San Diego, and on to the proposed 48-inch public storm trunk line, where it would be picked up by the existing headwall and public 48-inch storm drain that flows beneath I-8.

All new parking, garage, and road surface stormwater would be collected via storm drain inlet structures and piped to different biofiltration basins throughout the site for water quality treatment and hydromodification controls. The church/sanctuary building would have roof drains directed to biofiltration basin 4. Concrete brow ditches would be used to convey off-site drainage, drainage along the property line, and self-mitigating landscape areas. These ditches would end at catch basins and routed amongst the main storm drain line and routed south. With the exception of DMA-4, the entire off-site and on-site drainage ends up in the 48-inch public storm drain within the Caltrans ROW before it exits at a headwall into an engineered earthen tunnel. This flows adjacent to the proposed retaining wall and church/sanctuary building before outletting at riprap and converging with the treated runoff from DMA-4. For there, storm drainage follows the existing drainage path to the existing 48-inch Caltrans storm drain (with headwall).

The project would incorporate source control BMPs, including the following: prevention of illicit discharges into the MS4; storm drain stenciling or signage; and protection of outdoor storage material areas and trash storage areas from rainfall, run-on, runoff, and wind dispersal. Additional BMPs would be implemented based on the following potential source runoff pollutants for the project: on-site storm drain inlets; interior floor drains and elevator shaft sump pumps; interior parking garages, landscape/outdoor pesticide use; refuse areas; industrial processes; outdoor storage of equipment or materials; vehicle and equipment cleaning; vehicle and equipment repair and maintenance; fire sprinkler test water; miscellaneous drain or wash water; and plaza, sidewalks, and parking lots.

Site design BMPs that would be implemented as part of the project include the conservation of natural areas, soils, and vegetation; minimization of impervious areas and soil compaction; impervious area dispersion; runoff collection; and landscaping with native or drought-tolerant species. Conservation of natural areas, soils, and vegetation would occur by planting additional native or drought-tolerant trees and shrubs and replacement of topsoil in areas of disturbance. Impervious areas would be minimized by using permeable pavers in the private driveways and surface parking areas, and within drive aisles to the minimum width necessary. All proposed landscape and biofiltration areas minimize soil compaction to allow more stormwater runoff to permeate into the soil and slow down flows. The project disperses all impervious areas through landscaping, biofiltration/stormwater treatment, or permeable pavers prior to draining to the public storm system. The project treats site runoff in permanent post-construction BMPs prior to releasing flow off site. All proposed landscape areas would be planted with native or drought-tolerant species.

In summary, the project would incorporate BMPs, including the use of permeable pavement and four biofiltration basins to treat stormwater before release into the stormwater system. The biofiltration basins have been sized and designed to meet water quality and hydromodification requirements. The improvements would ensure that all on-site stormwater runoff, including roof and garage drainage, would be diverted to a private storm drain system and treated by the biofiltration basins and detained in accordance with the City's hydromodification requirements before being discharged. The treated and detained storm runoff would be conveyed as described in

Section 7.1.7, *Hydrology*. The on-site treatment BMPs outlined in the Stormwater Quality Management Plan would comply with the City's Stormwater Quality Standards. Therefore, less-than-significant water quality impacts are identified.

7.1.15 Wildfire

The City has not yet prepared Significance Determination Thresholds for potential impacts associated with wildfire. Therefore, for purposes of this analysis, guidance provided by issue questions listed in CEQA Guidelines Appendix G are used to evaluate the potential for significant wildfire impacts. Specifically, a significant impact is identified if a project would:

- Substantially impair an adopted emergency response plan or emergency evacuation plan;
- Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire;
- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; and/or
- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

As discussed in Section 7.1.11, *Public Services and Facilities*, the project site is located within the SDFD service area for fire protection services. The fire station closest to the project site is Fire Station 31, located approximately 1.1 miles north of the project site. Fire Station 31 serves Grantville/Del Cerro and its surrounding areas, with a district of 6.3 square miles (City of San Diego 2021c).

7.1.15.1 Emergency Response or Evacuation Plan

As discussed in Section 7.1.6, *Health and Safety*, the City participates in the County's Unified San Diego County Emergency Services Organization and County of San Diego Operational Area Emergency Plan (County of San Diego 2018). Primary evacuation routes identified in the emergency plan that are nearest to the project site include I-8, which is located just south of the project site, and I-15, which is located approximately 3 miles west of the project site. As discussed previously, specific evacuation routes would be determined based on the location and extent of the emergency incident and generally would include as many predesignated transportation routes as possible (County of San Diego 2018). While the project would result in off-site improvements on College Avenue to provide access to and from the site, these improvements would not impair the implementation of, or physically interfere with, an adopted emergency response plan or evacuation plan. An encroachment permit from the City would be required for the identified improvements to College Avenue, and traffic control would be implemented to ensure safe passage through the area while construction is occurring. The permit and traffic control requirements would ensure that emergency access is maintained in the project area during construction activities. Once complete, the project would not interfere with any emergency response due to construction activities along College Avenue.

During operation of the project, people would be present at the project site primarily on Sundays; although small group activities may occur during the weekdays or on Saturdays. The project would not result in a permanent increase in people living in the area. The Project would include the provision of a full access private driveway, which would be constructed along College Avenue, with a new signalized intersection and turn lanes and a second private driveway access would be added in the northern portion of the site, providing an additional access point to the site from College Avenue. The project's ingress/egress plans would be required to comply with the City's street design requirements, including standards related to minimum sight distance and emergency access. Signalization of the project entrance would control traffic coming in and out of the site. Additionally, the project would be constructed to comply with the City's Fire Code and City requirements related to development within a VHFHSZ, including standards for maintaining emergency evacuation and access. Impacts associated with emergency response and evacuation plans would be less-than-significant impact.

7.1.15.2 Exacerbate Wildfire Risks

According to the City's VHFHSZ Map No. 20, the project site is located within a "VHFHSZ & 300' Brush Buffer" (City of San Diego 2009). The project site is surrounded on all sides by urban development, with the exception of an isolated fee-owned parkland parcel that is situated between I-8 and the project site that does not interface with wildlands. Some undeveloped hillsides occur east of the project site and west of College Avenue but are bordered by I-8 to the south, and residential development to the west and north. Due to the project's location in a VHFHSZ, and the presence of undeveloped land adjacent to the site, the project would have the potential to result in impacts associated with VHFHSZs. The proposed church/sanctuary building would consist of concrete-tilt up facades, with accents of wood fascia and terra-cotta-colored tile roofing materials. The parking structure would be constructed with concrete walls. The primary construction materials for the structures consist of concrete, and roofing for the church/sanctuary building would consist of tile roofing materials, resulting in minimal flammability for the proposed structures. Landscaping would be installed as part of the project, including the areas along the southern portion of site, south and west of the proposed church/sanctuary. No fuel modification zones are required as part of the project. As part of standard development procedures, the proposed development plans, including the landscaping plan, would be submitted to the City for review and approval to ensure that the project would be constructed to comply with the City's Fire Code and City requirements related to development within the VHFHSZ. As such, the project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

7.1.15.3 Installation or Maintenance of Infrastructure

The project does not include components that would require the installation or maintenance of associated infrastructure that may exacerbate fire risk. The project is located in an urbanized area, with direct access to area roadway network and emergency services within the city. Utilities are present in the project vicinity and direct connection to existing utilities would occur as part of project construction. No new roads, fuel breaks, emergency water sources, or other utilities that may exacerbate fire risk are proposed as part of the project. No impact would occur.

7.1.15.4 Downstream Flooding or Landslides

As discussed in Section 7.1.4, *Geologic Conditions*, no landslides or indications of deep-seated land sliding were observed at the site during field observations or during review of published geologic maps. The nearest known landslide is approximately 0.75 miles west of the project within exposures of Friars Formation, which are not present at the project site. The project site currently contains slopes up to approximately 25 feet in height along the western/northwestern property boundary, adjacent to College Avenue (Advanced Geotechnical Solutions 2020a; Appendix F). Existing slopes descend to a minor drainage basin at the southwestern corner of the site. Construction of the project would include grading of approximately 93 percent of the project site, with the two-level parking structure recessed into the terrain. The project includes the construction of stormwater systems and detention basins to control runoff rates and prevent flooding on or off site. The project would incorporate geotechnical recommendations and would comply with applicable building standards and the City's BMPs for drainage. Compliance with geotechnical recommendations, building and construction standards, and the City's BMP requirements, as well as the construction of on-site stormwater systems and detention basins would ensure that the project would not result in significant impacts associated with downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

7.2 Growth Inducement

This analysis presents responses to each Initial Study checklist question and demonstrates why the project's effects on growth inducement are not found to be significant. Based on the City's Initial Study Checklist, a project could result in significant growth inducement impacts if it would:

- Induce substantial population growth in an area, (for example, by proposing new homes and commercial or industrial businesses beyond the land use density/intensity envisioned in the community plan);
- Substantially alter the planned location, distribution, density, or growth rate of the population of an area; or
- Include extensions of roads or other infrastructure not assumed in the community plan or adopted Capital Improvements Project list, when such infrastructure exceeds the needs of the project and could accommodate future developments.

A project is regarded as growth-inducing if it can foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (CEQA Guidelines Section 15126.2(d)). Included in this definition are projects that would remove obstacles to population growth, such as extending public services into areas not previously served. Growth inducement can also be defined as an action that would encourage an increase in density of development in surrounding areas or encourage adjacent development. Growth should not be assumed to be beneficial, detrimental, or of little significance to the environment (CEQA Guidelines Section 15126.2(d)).

The project is an institutional use that would serve the existing population in the project vicinity. The project does not include new residences or a large job-generating use that would cause workers to relocate to the area. Although the project site is currently vacant, it is located in an urbanized area

with existing residential, commercial, institutional, and recreational uses with adequate utility services. As such, the project would not result in substantial growth inducement. The infill nature of the project would not foster population growth, either directly or indirectly, as it would accommodate the population currently existing rather than opening up a new area of land for population growth. The project would not alter the planned location, distribution, density, or growth rate of the Navajo Community Plan area, adjacent communities, or the city as a whole.

Although the project includes improvements to existing on-site utilities such as water, sewer, and electricity, these improvements would be sized to only serve the needs of the project and would not extend into previously unserved areas. No new infrastructure would be provided that would exceed the needs of the project and/or that could accommodate future growth not already planned for the project area. Development of the proposed institutional use and associated parking and landscaping would not foster economic or population growth, either directly or indirectly, such that construction of additional housing in the surrounding area would be required. For these reasons, the project would not encourage or facilitate growth-inducing activities that could significantly affect the surrounding environment, individually or cumulatively.

7.3 Significant Environmental Effects that Cannot Be Avoided if the Project Is Implemented

CEQA Guidelines Section 15126.2(b) requires an EIR to identify significant environmental effects that cannot be avoided if the project is implemented (14 CCR 15000 et seq.). As discussed in Chapter 5, *Environmental Analysis*, implementation of the project would not result in any significant and unmitigated impacts.

7.4 Significant Irreversible Environmental Changes Caused by the Project

CEQA Guidelines Section 15126.2(d) requires the evaluation of significant irreversible environmental changes that would occur as a result of a project. The evaluation includes a discussion of primary and secondary impacts, and environmental accidents potentially associated with the project. Primary impacts can include impacts associated with the use of nonrenewable resources (i.e., biological habitat, agricultural land, mineral deposits, water bodies, energy resources, and cultural resources). Secondary impacts can include impacts such as highway improvements which provides access to a previously inaccessible area.

Section 15126.2(d) also states that irretrievable commitments of resources should be evaluated to ensure that current consumption of such resources is justified. Implementation of the project would not result in significant irreversible impacts to agricultural land, mineral resources, water bodies, historical resources, paleontological resources, or tribal cultural resources.

The project would require the commitment of energy and non-renewable resources such as electricity, fossil fuels, natural gas, construction materials (such as concrete, asphalt, sand and gravel, steel, petrochemicals, and lumber), potable water, and labor during construction. The project would be required to comply with current Title 24 Building Standards and CALGreen Code, as discussed previously. Additionally, the project incorporates several sustainable building practices to

minimize its consumption of energy and non-renewable resources, which would be included as part of project conditions of approval, including the following: cool/green roofs; the use of low-flow fixtures/appliances and low-flow irrigation; electrical vehicle charging stations; designated and secure bicycle parking spaces; designated parking spaces for low-emitting, fuel-efficient, and carpool/vanpool vehicles; and implementation of a solid waste recycling plan. Nonetheless, the use of these resources would have an incremental effect regionally and would result in long-term irretrievable losses of non-renewable resources, such as fuel and energy.

The project would result in the loss of a total of 4.0 acres of sensitive vegetation, consisting of 3.9 acres of Tier II vegetation and 0.8 acres of Tier IIIB vegetation. Additionally, construction of the project could result in direct injury or mortality to the orange-throated whiptail and would result in direct loss of its habitat. Indirect impacts to special-status plant and animal species would be less than significant due to the infill nature of the project and its location in an urbanized area. Irreversible impacts to an individual orange-throated whiptail and its habitat and to sensitive vegetation would occur as a result of project implementation, as discussed in Section 5.2, *Biological Resources*. The species is, however, adequately conserved in the Multi-Habitat Planning Area (MHPA). Project impacts to biological resources would be mitigated to less than significant by incorporation of Mitigation Measures Bio-1, which would protect biological resources during construction, and Bio-2, which would provide payment to the City's habitat acquisition fund.

The project has the potential to disturb unknown subsurface sensitive historical resources and tribal cultural resources (TCRs) during project construction, and such impacts would be irreversible. However, impacts for subsurface historical resources and potential TCRs would be reduced below a level of significance with incorporation of mitigation, as described in Sections 5.3, *Historical Resources*, and 5.6, *Tribal Cultural Resources*. Recovery of any unearthed materials would occur during construction monitoring.

The project does not include the provision of roadway or highway improvements that would provide access to previously inaccessible areas. The project's driveways and off-site improvements to College Avenue have been designed in accordance with City engineering standards. The project would not result in secondary impacts that would cause significant irreversible environmental changes.

8. PROJECT ALTERNATIVES

8.1 Introduction

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15126.6(a), an Environmental Impact Report (EIR) must contain a discussion of “a range of reasonable alternatives to the project, or to the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” Section 15126.6(f) further states that “the range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.”

The following discussion focuses on project alternatives that are capable of eliminating significant environmental impacts or substantially reducing them as compared to the project, even if the alternative would impede the attainment of some project objectives or would be more costly. In accordance with CEQA Guidelines Section 15126.6(f)(1), among the factors that may be taken into account when addressing the feasibility of alternatives are: (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site. Not one of these factors establishes a fixed limit on the scope of reasonable alternatives. An alternative does not need to be considered if its environmental effects cannot be reasonably ascertained and if implementation of such an alternative is remote or speculative.

The evaluation of individual alternatives considered in detail is provided in Sections 8.4.1 through 8.4.3, with a summary of the project alternatives and identification of the environmentally superior alternative outlined in Section 8.5. A matrix comparing the environmental impacts of the alternatives analyzed in detail to those of the project as proposed is provided thereafter.

8.2 Summary of Project Objectives and Significant Effects

As required in CEQA Guidelines Section 15126.6(a), in developing the alternatives to be addressed in this section, consideration was given regarding an alternative’s ability to meet most of the basic objectives of the project. These objectives are presented in Chapter 3, *Project Description*, of this EIR and are provided below in Section 8.2.1 for ease of reference.

8.2.1 Project Objectives

The objectives associated with the project are as follows:

1. Place the church/sanctuary in a central San Diego location that is both visible from and convenient to a regional freeway to facilitate church attendance;
2. Relocate to a church-owned property that has proximity to its existing congregation, including its members in City Heights, Mid-Cities, College Area, and Del Cerro;

3. Establish a place of worship that would accommodate the existing and future space needs of its staff and congregation;
4. Design the structures and site improvements to be sensitive to the existing topography and surrounding neighborhoods;
5. Address the parking needs on Sundays by constructing sufficient parking to accommodate the maximum projected parking demand;
6. Develop the church/sanctuary near where transit connections are readily available to its congregation;
7. Enhance the religious, spiritual, and community-building activities, including Sunday School and adult education, through the design and character of the indoor and outdoor spaces; and
8. Fulfill the institution's religious mission to be a multi-ethnic, multi-generational local church with a global vision.

8.2.2 Significant Impacts of the Proposed Project

Based on the analysis contained in Chapter 5, *Environmental Analysis*, the project would result in the potential for significant impacts to biological resources (sensitive habitat), historical resources (unknown archaeological and religious or sacred resources, human remains), noise (construction noise) and tribal cultural resources (TCRs). Measures have been identified in Chapter 5 that would reduce these project impacts to below significance with mitigation incorporated. Project impacts to land use and visual effects/neighborhood character would be less than significant, as described in Chapter 5.

In accordance with CEQA Guidelines Section 15126.6(c), the following analysis of project alternatives is preceded by a brief description of the rationale for selecting the alternatives to be discussed. In addition, alternatives that were considered but rejected are also identified. It should be noted that CEQA does not compel a lead agency to adopt an alternative that is less environmentally damaging than the project, but only to identify feasible alternatives that could avoid or substantially lessen the project's significant environmental effects. CEQA states that "in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof" (Public Resources Code Section 21002).

8.3 Alternatives Considered but Rejected

In accordance with CEQA Guidelines Section 15126.6(f)(2)(A), alternative locations for the project would be considered if "any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR." An alternative use for the site is discussed below in response to comments received on the Notice of Preparation (NOP) (see Appendix A for details).

8.3.1 Alternative Project Location

Off-site alternatives should be considered if development of another site is feasible and if development of another site would substantially lessen or avoid the significant impacts of the project. Factors that need to be considered when identifying an off-site alternative include the size of the site, its location, the General Plan (or other applicable planning document) land use designation, availability of infrastructure, and whether or not the applicant can reasonably acquire, control, or otherwise have access to the alternative site. It should be noted that the availability of an alternative site does not in and of itself reduce the project's impact potential. It is expected that developing a similar project on a different site would result in a similar array of project impacts and would simply transfer the impact potential to areas surrounding the alternate site location.

Currently, All Peoples Church occupies several rented buildings at 5555 University Avenue in the College area community, approximately 2.5 miles south of the project site. Their current facilities are being planned for redevelopment as part of the Chollas Triangle Park project. The offices are open Monday through Thursday from 9 a.m. to 6 p.m. and are closed on Fridays. Services are provided on Sundays during three timeframes. The church generally draws its congregation from the surrounding communities and is located in central San Diego for ease of access to its existing population. The choice of properties with significantly differing environmental profiles is limited in this region due to:

1. The applicant's need to locate in fairly close proximity to the population base it currently serves;
2. High levels of development already present in the area; and
3. The limitations of available sites in terms of size and functionality.

This project area and nearby communities are already highly developed, as shown in Figure 2-2. As a result, available sites of sufficient size are not common. Site ownership and site design are important aspects of the site selection for the applicant, so that the facility can fully express design features that support the religious beliefs of the congregants. Therefore, renting is not an option because it would not meet the basic needs of the applicant. The applicant conducted an extensive survey of area properties before initiating this proposal, and the proposed location was found to best fit their needs. The applicant does not currently own any similarly sized undeveloped or developed parcels within the project area, and the applicant cannot reasonably acquire, control, or otherwise have access to a sufficiently sized alternative site within the communities it serves.

The present site described in this EIR remains the best location that combines all of the factors that the applicant requires for an adequate worship facility. Any project in the area would rely on existing infrastructure, including primary access routes, rendering a different location likely to have similar traffic impacts. Proximity to existing development would trigger similar concerns expressed by the local community. Additionally, a developed site could be closer to sensitive receptors or be on level terrain with residential development, possibly increasing the intensity of project effects. The areas in the vicinity that are undeveloped are more distant from developed areas and are frequently located in environmentally sensitive locations, such as steep hillsides or on properties with highly sensitive biological resources.

No alternative location is proposed in the EIR because this site presents special features that make it the best choice for a project of this kind. The approximately 6-acre site contains adequate room to accommodate a church/sanctuary building, parking, and access. The building site is lower in elevation than surrounding residential uses, making it less dominant when compared to level properties. All of the required infrastructure is already available to serve the site. Finally, relocating the project to an alternative location away from major roads would not allow the applicant to take advantage of freeway access and visibility and transit within the community it serves, which is one of the project objectives. As such, the current site presents characteristics that make it particularly well-suited for the project and an alternative project location is not studied in detail in this EIR.

8.3.2 Alternative Land Use

In response to comments received on the NOP, community members have suggested alternative land uses for the project site, including retaining the site as open space or developing the property into a park. As noted in Chapter 3, *Project Description*, of the EIR, the project site is designated for residential use in the General Plan and Navajo Community Plan (Community Plan) and is zoned RS-1-7; therefore, retaining the site as open space or creating a park use would be inconsistent with the intent of the General Plan, Community Plan, and underlying zoning. Retention of the site in open space would prevent a property in an infill location that has access to utilities, public services, and transit from being developed. Development of a neighborhood park in this location would have similar construction-period impacts to biological resources, historical resources, and noise as the project. In addition, a park would not be compatible with the freeway noise exposure currently experienced on site, based on the land use-noise compatibility standards in the Noise Element of the General Plan (see Table 5.4-3). Finally, alternative land uses would not achieve any of the applicant's project objectives. Therefore, alternative land use scenarios are not studied in detail in this EIR.

8.3.3 No Project/Existing Community Plan

Under the existing Community Plan, the property would be developed with a residential use that is consistent with the land use designation and zoning for the site. A Community Plan Amendment would not be required to for development according to the existing Community Plan. Based on the development regulations in the Land Development Code (LDC) for the RS-1-7 (Section 131.0430 for Development Regulations of Residential Zones), the following basic requirements would be applied to the approximately 6-acre project site to define development that would occur with the existing Community Plan:

- Minimum lot size of 5,000 square feet
- Minimum lot width of 50 feet
- Minimum lot depth of 95 feet
- Minimum front setback of 15 feet
- Minimum rear setback of 13 feet
- Maximum height structure of 30 feet

Based on the RS-1-7 development regulations, up to 52 single-family homes could be constructed on site. If accessory dwelling units (ADU) are built concurrently on site, in accordance with LDC Section 141.0302, the existing Community Plan could allow for the development of up to 52 ADUs on the project site. A total of up to 104 units could be constructed on-site under the existing Community Plan. Similar to the project, it is likely that a deviation related to side yard setbacks would be required to implement this alternative due to the project site's relationship to College Avenue. The entire project site would be graded and retaining walls would be used to create buildable area. Development consistent with the existing Community Plan would construct residences that would comply with the height and bulk regulations in the RS-1-7 zone, whereas the project is requesting deviations from the height regulations to accommodate the roofline and cross on the church/sanctuary building. Therefore, development consistent with the existing Community Plan would directly align with the height and bulk regulations in the LDC, as compared to the project.

Development of the project site consistent with the existing Community Plan would result in up to 104 units, which would generate 1,040 new vehicle trips (based on the City trip generation rate of 10 trips/unit). That amount of traffic would not qualify as a small project, as defined by the City's Transportation Study Manual guidelines, and thus is assumed to result in a significant impact related to Vehicle Miles Traveled (VMT). The presumed new significant VMT impact is a new significant impact, resulting in greater significant impacts as compared to the project, which would not result in a significant transportation impact as discussed in Section 7.1.12, *Transportation*. Finally, the Existing Community Plan alternative would not achieve any of the applicant's project objectives. Therefore, development consistent with the existing Community Plan is not studied in detail in this EIR.

8.4 Alternatives Considered in Detail

The following three alternatives are provided to reduce or eliminate the project's potential for significant impacts to biological resources, historical resources, noise, and TCRs:

- No Project/No Development Alternative
- Reduced Residential Development Alternative
- Reduced Project Alternative

The alternatives analysis provided herein is compared to the impacts associated with the project, in accordance with CEQA Guidelines Section 15126.6(d). The three alternatives discussed below represent a reasonable range of alternatives, as defined in the CEQA Guidelines, because they present feasible alternate development scenarios that would reduce and/or eliminate significant impacts associated with the project.

8.4.1 No Project/No Development Alternative

Consideration of a no project alternative is required by CEQA Guidelines Section 15126.6(e). The analysis of a no project alternative must discuss the existing conditions at the time the NOP was published (i.e., October 22, 2021), as well as “what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services” [CEQA Guidelines Section 15126.6(e)(2)]. The requirements also specify that, “If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this ‘no project’ consequence should be discussed” [CEQA Guidelines Section 15126.6(e)(3)(B)]. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving a project with the impacts of not approving the project.

Under the No Project/No Development Alternative for this EIR, construction of the project would not occur. The site would remain as described in Chapter 2, *Environmental Setting*, and no changes to the existing site would occur under the No Project/No Development Alternative. Because a new church/sanctuary building would not be constructed, this alternative would not achieve the project’s basic objectives related to relocating the facility to a church-owned property that has proximity to its existing congregation; establishing a place of worship that would accommodate the space needs of its staff and congregation; addressing the parking needs on Sundays by constructing an on-site parking structure; develop the church/sanctuary near where transit connections occur; and enhancing the religious, spiritual, and community-building activities through the design and character of the indoor and outdoor spaces.

8.4.1.1 Comparison of the Impacts from the No Project/No Development Alternative to the Project

Land Use

Under the No Project/No Development Alternative, the project site would remain vacant and undeveloped. No institutional development would be constructed on site. The property would continue to be designated and zoned for residential development. This alternative would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, community plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. This alternative would not avoid or reduce any significant land use impacts, given that the project’s impact would be less than significant.

Biological Resources

The project site features both native and non-native habitats, which would continue to exist on site under the No Project/No Development Alternative. Because of the site’s location within an urbanized area, no impacts to wildlife corridors or migratory wildlife species would occur under the alternative and the project. Over time, the on-site habitat may continue to be subjected to indirect effects, such as erosion, litter, lighting, noise, and invasive species, given its position in an urbanized setting. The potentially significant, but mitigable, direct impacts to sensitive habitats and species caused by the project would be avoided by this alternative.

Historical Resources

As no prehistoric cultural resources were identified on site, this alternative would not result in any direct impacts to known archaeological resources. There would be no need for mitigation given that the No Project/No Development Alternative would not result in construction that would lead to potentially significant impacts to unknown historical (cultural) resources. This alternative would avoid the project's potentially significant, but mitigable, impacts to unknown archaeological resources.

Noise

No construction or operational noise sources would be created on the project site under the No Project/No Development Alternative. Although operational transportation noise would be less than significant for the project, this alternative would result in no increase in off-site transportation noise levels. Because no grading, construction, or any other site disturbance would occur, the No Project/No Development Alternative would also avoid the project's potentially significant impacts from construction noise, which could affect nearby sensitive receptors.

Visual Effects and Neighborhood Character

The No Project/No Development Alternative would not alter views in the project area; however, since none of the public vantage points in the project area are designated as view corridors by the Community Plan, no impact would be avoided. Retention of the site in its vacant and undeveloped state would not damage scenic resources as none occur on site. Without any construction proposed, there would be no new structures built on site. In terms of the effects of bulk and scale on visual character or quality of the site and surroundings, this alternative would avoid the project's less-than-significant impacts to visual quality and neighborhood character.

Tribal Cultural Resources

No known TCRs were identified on the project site. The No Project/No Development Alternative would not result in ground disturbance or construction activities that could lead to the discovery of unknown TCRs. The discovery of such resources would be a potentially significant impact; however, this alternative would avoid the potentially significant, but mitigable, impacts associated with the discovery of unknown TCRs.

8.4.2 Reduced Residential Development Alternative

Under this alternative, the property would be developed with the Marburn Corporation residential subdivision which was approved by the City Council in 2018 (Project No. 435438). Similar to the project, this alternative required approval of a Site Development Permit (SDP), Planned Development Permit (PDP), Easement Vacations, and Tentative Map (TM). Similar to the project, several deviations from the LDC are needed to implement this alternative. A Community Plan Amendment (CPA) is not required to implement the residential development. Despite the RS-1-7 development allowances outlined under the No Project/Existing Community Plan Alternative that permit more residential units, the Reduced Residential Development Alternative consists of the construction of 24 residential units, five homeowner association lots, private access to the property, and other site improvements. The alternative also includes 12-foot-high masonry walls around the

site perimeter with landscape screening. Nearly the entire project site would be graded to implement this alternative. The approved site plan for this alternative is provided in **Figure 8-1, Reduced Residential Development Alternative**. The below environmental analysis is a summary of the relevant portions of the Mitigated Negative Declaration (SCH No. 2017051071) and its technical reports adopted as part of the prior approvals, which are incorporated by reference herein (City of San Diego 2017), in accordance with CEQA Guidelines Section 15150.

8.4.2.1 Comparison of the Impacts from the Reduced Residential Development Alternative to the Project

Land Use

This alternative is compatible with the residential land use designation and zoning for the project site and is consistent with the existing underlying zone. A PDP was required for four deviations: to create buildable lots without frontage on a dedicated public right-of-way; to create residential lots which take access from a private drive; to reduce the front- and rear-yard setback for certain units; and to allow certain lots to deviate from the minimum required lot depth.

Due to the project site's proximity to the freeway and College Avenue, the Reduced Residential Development Alternative would not be considered a compatible land use given the exterior noise environment on site (i.e., greater than 65 dB CNEL as shown in Section 5.4 of this EIR) based on the Land Use-Noise Compatibility Criteria in the Noise Element of the General Plan. Exterior use areas for the residential development would be considered "conditionally acceptable." To implement the project and comply with the land use compatibility policy in the Noise Element, noise walls and/or enhanced building materials and mechanical ventilation would likely be required. In contrast, the institutional land use associated with the project would be consistent with the Noise Element policies given that outdoor usable open space is not required. No significant land use impacts would be avoided by this alternative.

Biological Resources

The Reduced Residential Development Alternative would disturb 3.0 acres of Tier II Diegan coastal sage scrub and 0.6 acres of Tier IIIB non-native grasslands, resulting in similar significant impacts to sensitive habitat as the project and would require similar mitigation (i.e., payment into the City's habitat acquisition fund). Both this alternative and the project would require construction monitoring to mitigate for significant indirect impacts to sensitive habitats. No impacts to wetlands or jurisdictional areas would occur for this alternative similar to the proposed project. Because of the site's location within an urbanized area, no impacts to wildlife corridors or migratory wildlife species would occur under the alternative and the project. The alternative project would be consistent with all the goals and policies in the City's Multiple Species Conservation Plan related to the protection of biological resources, including the need to get an SDP for impacts to sensitive biological resources. This alternative's potentially significant, but mitigable, impacts to biological resources would be substantially similar to those of the project.

Historical Resources

Similar to the project, no prehistoric cultural resources were identified on site; however, the project area is known to contain significant archaeological resources and the potential would exist for significant impacts to unknown cultural resources. Mitigation in the form of construction monitoring would be required during the implementation of the Reduced Residential Development Alternative. This alternative's potentially significant, but mitigable, impacts to historical (cultural) resources would be substantially similar to those of the project.

Noise

Both the project and the Reduced Residential Development Alternative would contribute to increases in traffic noise in the project vicinity; as compared to the church project, this residential alternative would produce a similar level of traffic related noise due to similar trip generating characteristics (i.e., 260 trips for the alternative versus 280 trips for the project). In both cases, the increase in traffic noise would not exceed the City's noise criteria and less than significant transportation noise impacts would arise in the local community. Daily construction noise would be produced by this alternative similar to the project. The acoustical analysis conducted for this alternative determined that construction noise would be temporary in nature and the residential development would be required to comply with the noise limits in the San Diego Municipal Code (SDMC). Compliance with these regulations would require the development to implement standard noise control measures, such as ensuring all equipment is properly maintained and that equipment mufflers and noise enclosures are used. In addition, noise mitigation measures were identified in this alternative's acoustical analysis in order to further reduce construction noise to acceptable noise levels (Davy & Associates 2016). As described in Section 5.4 of this EIR, noise control would also be required to reduce the project's construction noise impacts to less than significant. During the long-term operation of the Reduced Residential Development Alternative, noise levels would be typical of residential uses and would not result in an increase in the existing ambient noise levels or result in noise levels in excess of standards established in the City of San Diego General Plan or Noise Ordinance. Similar to the Project, operational noise levels would be less than significant, and no mitigation would be required. Therefore, this alternative would result in substantially similar significant impacts from construction and operational noise as the project.

Visual Effects and Neighborhood Character

The Reduced Residential Development Alternative would alter views in the project area; however, none of the public vantage points are designated as view corridors by the Community Plan, as described in Section 5.5 of this EIR. No impacts to a designated scenic vista would occur, similar to the project. As with the project, this alternative would not damage scenic resources as none occur on site. The Reduced Residential Development Alternative would construct residences that would comply with the height and bulk regulations in the RS-1-7 zone whereas the project is requesting deviations from the height regulations to accommodate the roofline and cross on the church/sanctuary building. Therefore, the Reduced Residential Development Alternative would directly align with the height and bulk regulations in the LDC, as compared to the project. In terms of the effects of bulk and scale on visual character or quality of the site and surroundings, both the project and this alternative would result in less-than-significant impacts.

Tribal Cultural Resources

The Reduced Residential Development Alternative would result in grading at the site, at a scale similar to the project. No TCRs were identified on site; however, the potential would exist for significant impacts to unknown TCRs to occur under the Reduced Residential Development Alternative. Mitigation in the form of construction monitoring would be required during the implementation of the Reduced Residential Development Alternative. This alternative's potentially significant, but mitigable, impacts to TCRs would be substantially similar to those of the project.

8.4.3 Reduced Project Alternative

In an effort to reduce the potentially significant, but mitigable, impacts associated with constructing the project, a Reduced Project Alternative is evaluated that would reduce the amount of on-site grading required to implement the project. A reduced grading footprint would, in turn, reduce the project's significant impacts to biological resources, historical resources and TCRs. Under the Reduced Project Alternative, the project's surface parking would be modified to comply with the City's parking regulations, rather than constructing 37 more parking spaces than required by the City. Specifically, the Reduced Project Alternative would construct a total of 319 parking spaces, which would be 37 fewer spaces than the project is providing but would comply with the City parking requirements. Surface parking for the project is proposed north of the parking structure and along the eastern edge of the parking structure and church/sanctuary building as shown on the site plan in Figure 3-1. To construct 37 fewer parking spaces, the project's grading footprint would be reduced by approximately 0.4 acres, depending on which spaces are removed under this alternative. All other features of the project would remain the same as described in Chapter 3, *Project Description*.

8.4.3.1 Comparison of the Impacts from the Reduced Project Alternative to the Project

Land Use

Similar to the project, implementation of the Reduced Project Alternative would require approval of a CPA, SDP, PDP, TM and Easement Vacation. Reduction in the quantity of parking spaces would not require an additional deviation from the RS-1-7 regulations as this alternative would comply with the minimum parking standards in the SDMC. The Reduced Project Alternative would be consistent with applicable policies from the General Plan and Community Plan similar to the project. From a Noise Element perspective, institutional land uses, such as proposed by the Reduced Project Alternative and the project, would be compatible with the existing noise exposure on site. There would be no conflicts with applicable plans or policies under this alternative and the project.

Biological Resources

Implementation of the Reduced Project Alternative would have the potential to reduce but not eliminate the project's impact to sensitive habitat, such as Diegan coastal sage scrub and non-native grassland, as shown in Figure 5.2-1 up to approximately 0.4 acres. As such, similar mitigation (i.e., payment into the City's habitat acquisition fund) would be required for this alternative. No impacts to wetlands or jurisdictional areas are expected for this alternative similar to the project. Because of the site's location within an urbanized area, no impacts to wildlife corridors or migratory wildlife

species would occur under the alternative and the project. This alternative's potentially significant, but mitigable, impacts to biological resources would be reduced from levels associated with the project.

Historical Resources

Because no prehistoric cultural resources were identified on site, no direct impacts to cultural (archaeological) resources would occur under the Reduced Project Alternative, as is the case for the project. However, the project area is known to contain significant archaeological resources and the potential would still exist for significant impacts to unknown cultural resources. Reduction of the graded footprint would reduce the potential for causing impacts to cultural resources; however, mitigation in the form of construction monitoring would still be required by this alternative. This alternative's significant impacts to historical (cultural) resources would be slightly less than those of the project.

Noise

Because a similar amount of daily construction activity would be required to implement this alternative, potentially significant impacts from construction noise associated with this alternative would still affect nearby sensitive receptors, similar to the project. However, reduction in the graded footprint would increase the setback distance between construction activities and the nearby sensitive receptors which could lessen the extent of the construction noise impacts. However, similar mitigation as proposed for the project would be required to ensure this alternative's construction noise complies with the City standard and impacts would be less than significant. This alternative would result in the same institutional use occurring on the project site; thus, operational noise from parking lot and circulation activity associated with this alternative would be similar to or slightly less than that identified for the project and operational impacts would be less than significant. Therefore, the Reduced Project Alternative's noise impacts would be similar to those of the project.

Visual Effects and Neighborhood Character

The Reduced Project Alternative would alter views in the project area; however, none of the public vantage points are designated as view corridors by the Community Plan, as described in Section 5.5 of this EIR. No impacts to a designated scenic vista would occur, similar to the project. As with the project, this alternative would not damage scenic resources as none occur on site. The Reduced Project Alternative would not comply with the height and bulk regulations in the RS-1-7 zone and would require approval of deviations from the height regulations to accommodate the roofline and cross on the church/sanctuary building, similar to the project. Reducing the grading footprint would not substantially change the visual character of the development. In terms of the effects of bulk and scale on visual character or quality of the site and surroundings, both the project and this alternative would result in less-than-significant impacts.

Tribal Cultural Resources

No TCRs are known to occur on the project site; however, there is potential to uncover unknown buried TCRs during ground disturbance. The reduced grading footprint associated with the Reduced Project Alternative would reduce the area disturbed on site, resulting in a reduced potential to impact unknown TCRs. However, for the remainder of the project site that would still be graded under this alternative, the potentially significant, but mitigable, impact associated with the discovery of unknown TCRs would occur. Reduction of the graded footprint would reduce the potential for

causing impacts to TCRs; however, mitigation in the form of construction monitoring would still be required by this alternative. This alternative’s potentially significant impacts to TCRs would be slightly less than those of the project, but in both cases, the impact would be less than significant with mitigation.

8.5 Summary of Project Alternatives

The project alternatives discussed in this section are intended to avoid or substantially lessen one or more of the significant impacts identified for the project to below a level of significance. A summary comparison of impact levels for the issues identified as significant under the project is provided in **Table 8-1, Project Alternatives Summary of Impacts**. Pursuant to CEQA Guidelines Section 15126(e)(2), “if the environmentally superior alternative is the ‘No Project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” Based on that information and the discussions in Sections 8.4.1 through 8.4.3, the Reduced Project Alternative would be the environmentally superior alternative. Specifically, this alternative would reduce the project’s potentially significant, but mitigable, biological resources, historical (cultural) resources and TCR impacts by reducing the extent of grading required to implement the project. It would also increase the setback distance between construction activities and the nearby sensitive receptors, thus reducing construction noise impacts of the project.

**Table 8-1
PROJECT ALTERNATIVES SUMMARY OF IMPACTS**

Environmental Issue^a	Project	No Project/ No Development Alternative	Reduced Residential Development Alternative	Reduced Project Alternative
Land Use	LS	NI	LS	LS
Biological Resources	SM	NI	SM	SM-
Historical Resources	SM	NI	SM	SM-
Noise	SM	NI	SM	SM-
Visual Effects and Neighborhood Character	LS	NI	LS-	LS
Tribal Cultural Resources	SM	NI	SM	SM-

Notes: SM=significant but mitigable; LS=less than significant; NI=no impact; - = Less than the project; + = More than the project

^a Only the environmental effects contained in Chapter 5 are included in this comparison matrix.



Source: Marburn Corp TM

Figure 8-1

Reduced Residential Development Alternative

ALL PEOPLES CHURCH

INTENTIONALLY BLANK

9. MITIGATION, MONITORING, AND REPORTING PROGRAM

9.1 General Requirements

As lead agency for the project under the California Environmental Quality Act, the City of San Diego will administer the Mitigation, Monitoring, and Reporting Program (MMRP) for the following environmental issue areas as identified in the All Peoples Church Project EIR: Biological Resources, Historical Resources, Noise, and Tribal Cultural Resources. The mitigation measures identified below include all feasible measures from the All Peoples Church Project EIR (SCH No. 2021100394; Project No. 636444). This MMRP shall be made a requirement of project approval.

California Public Resources Code Section 21081.6 requires a lead or responsible agency that approves or carries out a project where an EIR has identified significant environmental effects to adopt a “reporting or monitoring program for adopted or required changes to mitigate or avoid significant environmental effects.” The City of San Diego is the lead agency for the All Peoples Church Project EIR and, therefore, must ensure the enforceability of the MMRP. An EIR has been prepared for this project that addresses potential environmental impacts and, where appropriate, recommends measures to mitigate these impacts. As such, an MMRP is required to ensure that adopted mitigation measures are implemented.

A. GENERAL REQUIREMENTS – PART I: Plan Check Phase (prior to permit issuance)

1. Prior to the issuance of a Notice to Proceed for a subdivision, or any construction permits, such as demolition, grading, or building, or beginning any construction-related activity on site, the Development Services Department (DSD) director’s environmental designee (ED) shall review and approve all construction documents (CDs) (plans, specification, details, etc.) to ensure that MMRP requirements are incorporated into the design.
2. In addition, the ED shall verify that the MMRP conditions/notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading **“ENVIRONMENTAL/MITIGATION REQUIREMENTS.”**
3. These notes must be shown within the first three sheets of the CDs in the format specified for engineering CD templates as shown on the City website:

<http://www.sandiego.gov/development-services/industry/standtemp.shtml>
4. The **TITLE INDEX SHEET** must also show on which pages the “Environmental/Mitigation Requirements” notes are provided.
5. **SURETY AND COST RECOVERY:** The DSD director or city manager may require appropriate surety instruments or bonds from private permit holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

B. GENERAL REQUIREMENTS – PART II: Post Plan Check (after permit issuance/prior to start of construction)

1. **PRE-CONSTRUCTION MEETING IS REQUIRED 10 WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT.** The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the permit holder's representative(s), job site superintendent, noise control coordinator, and the following consultants:

Qualified Biologist
Qualified Archaeological Monitor
Native American Monitor

Note: Failure of all responsible permit holder's representatives and consultants to attend shall require an additional meeting with all parties present.

CONTACT INFORMATION:

- a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division – 858.627.3200**
- b) For Clarification of ENVIRONMENTAL REQUIREMENTS, applicant t is also required to call the **RE and MMC at 858.627.3360**
2. **MMRP COMPLIANCE:** This project, Project Tracking System No. 636444 and/or Environmental Document No. 636444, shall conform to the mitigation requirements contained in the associated environmental document and implemented to the satisfaction of the DSD's ED (MMC) and the city engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e., to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.).

Note: Permit Holder's Representatives must alert the RE and MMC if there are any discrepancies in the plans or notes, or any changes due to field conditions. All conflicts must be approved by the RE and MMC BEFORE the work is performed.

3. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the permit holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution, or other documentation issued by the responsible agency:

None Required

4. **MONITORING EXHIBITS:** All consultants are required to submit, to the RE and MMC, a monitoring exhibit on a 11x17-inch reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the **LIMIT OF WORK**, scope of that discipline's work, and notes indicating when in the

construction schedule that work will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.

NOTE: Surety and Cost Recovery – When deemed necessary by the DSD director or city manager, additional surety instruments or bonds from the private permit holder may be required to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

5. **OTHER SUBMITTALS AND INSPECTIONS:** The Permit Holder/Owner’s representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC for approval per the following schedule:

**Table 9-1
 DOCUMENT SUBMITTAL/INSPECTION CHECKLIST**

Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
Biological Resources	Biological Construction Mitigation/Monitoring Exhibit	Prior to Preconstruction Meeting
Historical Resources	Archaeology Report	Archaeology/Historic Site Observation During Construction
Noise	Noise Control Measures	Prior to Preconstruction Meeting
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

9.2 Specific MMRP Issue Area Conditions/Requirements

9.2.1 Biological Resources

BIO-1: Biological Resource Protection during Construction.

I. Prior to Construction

- A. **Biologist Verification** – The owner/permittee shall provide a letter to the City’s Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City Biology Guidelines (City of San Diego 2018a), has been retained to implement the project’s biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.
- B. **Preconstruction Meeting** – The Qualified Biologist shall attend the preconstruction meeting, discuss the project’s biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.

- C. **Biological Documents** – The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.
- D. **Biological Construction Mitigation/Monitoring Exhibit** – The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME), which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City Assistant Deputy Director (ADD)/MMC. The BCME shall include a site plan, written and graphic depiction of the project’s biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.
- E. **Resource Delineation** – Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.
- F. **Education** – Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

II. During Construction

- A. **Monitoring** – All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on “Exhibit A” and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSV). The CSV shall be e-mailed to MMC on the first day of monitoring, the first week of each month, the

last day of monitoring, and immediately in the case of any undocumented condition or discovery.

- B. **Subsequent Resource Identification** – The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna onsite (e.g., flag plant specimens for avoidance during access, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state or federal regulations have been determined and applied by the Qualified Biologist.

III. Post Construction Measures

- A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, CEQA, and other applicable local, state and federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.

BIO-2: Sensitive Habitats. Impacts to 4.0 acres of Diegan coastal sage scrub and non-native grassland shall be mitigated at ratios of 1:1 and 0.5:1 for impacts outside the Multi-Habitat Planning Area (MHPA) and mitigation inside the MHPA, respectively, pursuant to Table 3, *Upland Mitigation Ratios*, in the City's Biology Guidelines (City of San Diego 2018a). Mitigation shall be accomplished via payment into the City's Habitat Acquisition Fund equal to 3.6 acres of habitat.

9.2.2 Historical Resources and Tribal Cultural Resources

HR-1: Cultural Resources (Archaeological Resources) Protection during Construction.

I. Prior to Permit Issuance

A. Entitlements Plan Check

- 1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.

B. Letters of Qualification have been submitted to ADD

- 1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.

2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.
3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site-specific records search (0.25-mile radius) has been completed. Verification includes, but is not limited to, a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
3. The PI may submit a detailed letter to MMC requesting a reduction to the 0.25-mile radius.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.
 - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. *Identify Areas to Be Monitored*
 - a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.
 - b. The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).
3. *When Monitoring Will Occur*
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.

- b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. *Monitor(s) Shall Be Present during Grading/Excavation/Trenching*

1. The Archaeological Monitor shall be present full time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances Occupational Safety and Health Administration safety requirements may necessitate modification of the AME.
2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and Section IV.A-D shall commence.
3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.
4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSV). The CSV's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. *Discovery Notification Process*

1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery and shall submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. *Determination of Significance*

1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.
 - b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor, and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground-disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.
 - c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (PRC) (Section 5097.98) and State Health and Safety Code (Section 7050.5) shall be undertaken:

A. *Notification*

1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process.
2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. *Isolate Discovery Site*

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains.
2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.

3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.
- C. *If human remains ARE determined to be Native American:*
1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call.
 2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
 3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.
 4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.
 5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
 - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR;
 - b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN
 - c. To protect these sites, the landowner shall do one or more of the following:
 - (1) Record the site with the NAHC;
 - (2) Record an open space or conservation easement; or
 - (3) Record a document with the County. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.
 - d. Upon the discovery of multiple Native American human remains during a ground-disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the

human remains and items associated and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c, above.

D. *If human remains are NOT Native American:*

1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC Section 5097.98).
3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

V. Night and/or Weekend Work

A. *If night and/or weekend work is included in the contract:*

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
2. The following procedures shall be followed:

a. No Discoveries

In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8 a.m. of the next business day.

b. Discoveries

All discoveries shall be processed and documented using the existing procedures detailed in Section III, During Construction, and Section IV, Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.

c. Potentially Significant Discoveries

If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III, During Construction, and Section IV, Discovery of Human Remains, shall be followed.

- d. The PI shall immediately contact MMC, or by 8 a.m. of the next business day to report and discuss the findings as indicated in Section III.B, unless other specific arrangements have been made.

B. *If night and/or weekend work becomes necessary during the course of construction:*

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. *All other procedures described above shall apply, as appropriate.*

VI. Post Construction

A. *Preparation and Submittal of Draft Monitoring Report*

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.
 - a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with State of California Department of Parks and Recreation. The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.
2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
4. MMC shall provide written verification to the PI of the approved report.
5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. *Handling of Artifacts*

1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued.
2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
3. The cost for curation is the responsibility of the property owner.

C. *Curation of Artifacts: Accession Agreement and Acceptance Verification*

1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.

2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV, Discovery of Human Remains, Subsection 5.

D. *Final Monitoring Report(s)*

1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

9.2.3 Noise

NOI-1: Best Management Practices. The following best management practices shall be incorporated into the project drawings and implemented during project construction to ensure sustained construction noise levels do not exceed 75 decibels over a 12-hour period at the nearest sensitive receivers:

- In order to reduce construction noise, a temporary noise barrier or enclosure shall be used along the property lines of adjacent residences to break the line-of-sight between the construction equipment and the adjacent residences. The temporary noise barrier shall consist of a solid plywood fence and/or flexible sound curtains attached to chain-link fencing.
- Barriers such as flexible sound control curtains shall be erected around stationary heavy equipment to minimize the amount of noise on the surrounding land uses to the maximum extent feasible during construction.
- Equipping of all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Electrical power shall be used to run air compressors and similar power tools, where feasible.
- Internal combustion engines shall be equipped with a muffler of a type recommended by the manufacturer and in good repair.
- All diesel equipment shall be operated with closed engine doors and be equipped with factory recommended mufflers.
- Prohibiting unnecessary idling of internal combustion engines.

- Locating stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors. Constructing temporary noise barriers to screen stationary noise-generating equipment when located near adjoining sensitive land uses.
- Utilization of "quiet" air compressors and other stationary noise sources where technology exists.
- Control of noise from construction workers' radios to a point where they are not audible at adjacent residences bordering the project site.
- Notifying of all adjacent residences of the construction schedule, in writing, and provide a written schedule of "noisy" construction activities to the adjacent and nearby residences at least 24 hours prior to initiation of construction activities that could result in substantial noise levels at outdoor or indoor living areas. This notification should include the anticipated hours and duration of construction and a description of noise reduction measures being implemented at the project site. The notification should include the telephone number and/or contact information for the on-site noise control coordinator that neighbors can use for inquiries and/or to submit complaints associated with construction noise.
- Designation of a noise control coordinator who shall be responsible for responding to any complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., bad muffler, etc.) and shall require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule.

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10. REFERENCES CITED

Advanced Geotechnical Solutions, Inc.

2020a *Updated Preliminary Geotechnical Investigation and Design Recommendations, Proposed Church Facility, APN 463-010-1000, San Diego, California 90212*, January 20.

2020b Infiltration Feasibility Condition Letter for Stormwater BMPs, All Peoples Church, APN 463-01-010-00, San Diego, California 92120. November 30.

Alden Environmental, Inc.

2020 *Biological Technical Report for the All Peoples Church Project in the City of San Diego, California*, August 28.

Baranek Consulting Group, Inc.

2020 *All Peoples Church, Waste Management Plan*, March.

2021 *All Peoples Church, Climate Action Plan Consistency Checklist*, July.

BlueScape Environmental

2021 *Air Quality Technical Study and Screening Health Risk Assessment Results for: All Peoples Church, San Diego, California*, October 27.

Brian F. Smith & Associates

2016 *Phase I Cultural Resource Survey for the Del Cerro Project*, April 12.

California Department of Conservation (CDC)

2021 California Important Farmland Finder. Accessed September 7, 2021.
<https://maps.conservation.ca.gov/dlrp/ciff/>.

California Department of Fish and Wildlife (CDFW)

2019 *Special Animals List*, August.

California Department of Toxic Substances Control (DTSC)

2021 EnviroStor Database. Accessed September 7, 2021.
<https://www.envirostor.dtsc.ca.gov/public/>.

California Department of Transportation (Caltrans)

2002 *California Airport Land Use Planning Handbook*.

2016 Traffic Volumes on California State Highways. <http://dot.ca.gov/trafficops/census/>.

2020 IS/EA Annotated Outline. <https://dot.ca.gov/programs/environmental-analysis/standard-environmental-reference-ser/forms-templates>.

California Energy Commission (CEC)

- 2021 California Energy Consumption Database. Accessed September 24, 2021.
<https://ecdms.energy.ca.gov/Default.aspx>.

California Native Plant Society (CNPS)

- 2019 Inventory of Rare and Endangered Plants (online edition, v8-03 0.39).

City of San Diego

- 1997 *Multiple Species Conservation Program, City of San Diego MSCP Subarea Plan*, March.
- 2001 *Historical Resources Guidelines, Land Development Code*, April.
- 2008a *City of San Diego General Plan*, March 10.
- 2008b *The San Diego Seismic Safety Study*. Panel 22, April 3.
<https://www.sandiego.gov/development-services/zoning-maps/seismic-safety-study>.
- 2009 Very High Fire Hazard Severity Zone Map.
- 2015a *City of San Diego Climate Action Plan*, December.
- 2015b *City of San Diego General Plan*, Land Use and Community Planning Element, June 29.
- 2015c *City of San Diego General Plan*, Mobility, June 29.
- 2015d *City of San Diego General Plan*, Economic Prosperity, June 29.
- 2015e *City of San Diego General Plan*, Noise Element, June 29.
- 2017 *Mitigated Negative Declaration for the Marborn Corp. TM Project, Project Number 435483*.
- 2018a *Land Development Code Biology Guidelines*, adopted September 1999; last amended February 1, 2018, by Resolution No. R-311517.
- 2020a *City of San Diego General Plan, Housing Element*, June 16.
- 2020b *Transportation Study Manual*, September 29.
- 2020c *California Environmental Quality Act (CEQA) Significance Determination Thresholds*, revised November.
- 2021a *City of San Diego General Plan*. Public Facilities, Services, and Safety Element, December 21.
- 2021b *City of San Diego General Plan*, Recreation Element, August 3.
- 2021c About SDFD Fire-Rescue Department. City of San Diego. Accessed September 7, 2021.
<https://www.sandiego.gov/fire/about>.
- 2021d San Diego Police Department, Eastern Division. City of San Diego. Accessed September 24, 2021.
<https://www.sandiego.gov/police/services/divisions/eastern>.

County of San Diego

- 2010 *Regional Airport Authority, Montgomery Field Airport Land Use Compatibility Plan*, January 25.

2018 *Operational Area Emergency Operations Plan*, September.

Davy & Associates

2016 *Acoustical Analysis, Marborn Corp TM/435483 Project*, December 16.

ECORP Consulting, Inc. (ECORP)

2020 *Noise Impact Assessment, All Peoples Church*, March.

2021 *All Peoples Church – Noise Technical Memorandum*, October.

Federal Emergency Management Agency (FEMA)

2021 National Flood Hazard Layer FIRMette. Accessed September 28, 2021.

Federal Highways Administration (FHWA)

2008 Roadway Construction Noise Model.

2011 *Effective Noise Control During Nighttime Construction*.

https://ops.fhwa.dot.gov/wz/workshops/accessible/schexnayder_paper.htm.

Federal Transit Administration (FTA)

2018 *Transit Noise and Vibration Impact Assessment*.

Harris Miller, Miller & Hanson, Inc.

2006 *Transit Noise and Vibration Impact Assessment, Final Report*.

LOS Engineering, Inc.

2021 *All People's Church Vehicle Miles Traveled Analysis (PTS# 636444)*, April 5.

2022 *Local Mobility Analysis Report, All People's Church, City of San Diego (PTS 636444)*, March 2.

Pasco Laret Suiter & Associates

2020 *Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP), All Peoples Church, PTS 63644*, February 11.

2021 *Preliminary Drainage Study, All Peoples Church, PTS #636444*, June 29.

San Diego Air Pollution Control District (SCAPCD)

2016 *2016 Revision of the Regional Air Quality Strategy for San Diego County*. December.

2019 Rule 20.2, New Source Review, Non-Major Stationary Sources, adopted May 19, 1994; revised June 26, 2019.

San Diego Association of Governments (SANDAG)

2020 *San Diego Info Bits, 2019 State of the Commute Report*, April.

San Diego County Regional Airport Authority (SDCRAA)

2010 Montgomery Field Airport Land use Compatibility Plan. December 20.

San Diego State University (SDSU)

2007 Campus Master Plan Final EIR. November.

San Diego Unified School District (SDUSD)

2021 San Diego Unified School District website, About Us. Accessed September 7, 2021.
https://sandiegounified.org/about/about_s_d_u_s_d.

United State Fish and Wildlife Service (USFWS)

2010 *Interim Golden Eagle Inventory and Monitoring Protocols*, February.

2014 *Quino Checkerspot Butterfly Survey Guidelines*, December 15.

Western Electro-Acoustic Laboratory, Inc.

2000 *Sound Transmission Sound Test Laboratory Report No. TL 96-186*.

11. CERTIFICATION

This document has been completed by the City of San Diego's Environmental Analysis Section under the direction of the Development Services Department Environmental Review Manager and is based on independent analysis and determinations made pursuant to the San Diego Municipal Code Section 128.0103. The following individuals contributed to the fieldwork and/or preparation of this report. Resumes of EIR and technical appendices preparers are on file and available for review at the City of San Diego, Development Services Department, 1222 First Avenue, Fifth Floor, San Diego, California 92101.

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Appendix B – Climate Action Plan Consistency Checklist – Baranek Consulting Group, Inc.

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Appendix C – Biological Technical Report – Alden Environmental, Inc.

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Appendix D – Phase 1 Cultural Resources Survey – Brian F. Smith Associates

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Appendix E – Noise Impact Assessment– ECORP Consulting, Inc.

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Appendix F – Geotechnical Investigation– Advanced Geotechnical Solutions, Inc.

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Appendix G – Air Quality Technical Study and Screening Health Risk Assessment – Bluescape Environmental Inc.

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Appendix H – Preliminary Drainage Study – Pasco Laret Suiter & Associates

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Appendix I – Stormwater Quality Management Plan (SWQMP) – Pasco Laret Suiter & Associates

- William Mack, P.E.

Appendix J – Local Mobility Analysis – LOS Engineering, Inc.

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Appendix K – Vehicle Miles Traveled Analysis – LOS Engineering, Inc.

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Appendix L – Waste Management Plan – Baranek Consulting Group, Inc.

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