

San Dieguito River Park  
Joint Powers Authority  
18372 Sycamore Creek Road  
Escondido, CA 92025  
(858) 674-2270 Fax (858) 674-2280  
[www.sdrp.org](http://www.sdrp.org)

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22<sup>nd</sup> District Agricultural  
Association

Shawna Anderson  
Executive Director

## AGENDA

### SAN DIEGUITO RIVER VALLEY REGIONAL OPEN SPACE PARK CITIZENS ADVISORY COMMITTEE

Friday, June 2, 2023  
10:30 a.m.

Location: San Rafael Parish  
Pastoral Center, Rooms D & E

(The Pastoral Center building is located on the south side of the parking lot)  
17252 Bernardo Center Drive, Rancho Bernardo  
(north of Rancho Bernardo Drive)

**The Chair cannot start the meeting until a quorum is present. PLEASE ARRIVE BY 10:25 A.M.** The CAC may take action on any item listed on the Consent or Discussion/Action agenda, but only when a quorum is present. If a quorum is temporarily lost during the meeting, no further discussion will take place until the quorum is regained. If the quorum is not regained, the meeting will be adjourned. **Please advise the Chair at the beginning of the meeting if you must leave before 12:15 p.m.**

NOTICE: Agenda packets are available on the [sdrp.org](http://sdrp.org) website. If you do not have the ability to access or print an agenda, please contact the office at 858-674-2270 to make alternative arrangements.

#### Roll Call and Introductions

Chair

*Late arrivals should speak to staff to make sure their attendance is noted.*

#### Approval of 4-7-23 Minutes (Pages 3-5)

#### Chair's Report

Chair

#### Executive Director's Report

Staff

#### Public Comment

Public

## DISCUSSION/ACTION

1. El Camino Real Assisted Living Project Draft Subsequent EIR (pages 6-X)
2. Status of Osuna Segment of Coast to Crest Trail - (Oral Report)
3. Proposed Fairgrounds Reach the Beach Trail and Gateway (Oral Report)
4. Committee Reports
  - a. Project Review Committee
  - b. Trails Committee
  - c. Interpretation Committee

## INFORMATION

Park Project Status and Updates (oral)

Adjournment

Chair

The next meeting is scheduled for July 7, 2023.

If you have any questions, please call Dewanda Vandermost, Office Manager at (858) 674-2270 x10

**SAN DIEGUITO RIVER PARK  
CITIZENS ADVISORY COMMITTEE  
Minutes of April 7, 2023**

**MEMBERS PRESENT**

Chris Khoury  
Rich Risner  
Phil Pryde  
Candice Bowman  
Judy Swink  
Linda Oster  
Maggie Brown  
Monica Demler  
Liz Gabrych  
Dorothy McLin  
Matt Cunningham  
Julie Klein  
Udo Wahn  
Sharon Fogg  
Jeff Barnouw  
Jan Fuchs  
Bob Dudley

**REPRESENTING**

CAC, Chair  
American Society of Landscape Architects  
Audubon Society  
Carmel Valley Planning Board  
Citizens Coordinate for Century 3  
Del Dios Town Council  
Friends of the San Dieguito River Valley  
Friends of Sikes Adobe  
League of Women Voters  
Lomas Serenas Property Owners  
San Diego Mountain Bike Association  
San Diego Trails Alliance  
San Dieguito Lagoon Committee  
San Dieguito Planning Group  
Coastal Property Owner  
Coastal Property Owner  
San Pasqual Property Owner

**VISITORS/STAFF PRESENT**

Brenda Miller  
Shawna Anderson  
Sue Carr, Alternate

San Dieguito River Park JPA  
San Dieguito River Park JPA  
Coastal Property Owner

**Introductions and Announcements**

Chair Khoury called the meeting to order at 10:36 AM. He reported the flowers blooming on many of the trails in the Park and also at Anza Borrego.

**Approval of Minutes- 2-3-23**

Jeff Barnouw moved to approve the minutes of February 3, 2023 and Phil Pryde seconded the motion. All members were in favor.

**Chair's Report** – Chair Khoury gave an update on the Goldspotted Oak Borer (GSOB) and his progress coordinating a GSOB treatment for the old oaks on Volcan Mountain Ferguson Flats and on the 40% capacity of Lake Hodges at 290 feet water level during San Diego's dam repair. Chair Khoury summarized the March JPA meeting and suggested the CAC invite JPA staff member Leana Bulay to give the same presentation on SDRP programs as received by the JPA Board

**Executive Director's Report** – Executive Director Shawna Anderson reported that JPA Office Manager resigned from the JPA to take another job JPA staff are interviewing candidates for a replacement. She mentioned the high competition for jobs that has affected the JPA's ability to fill the Environmental Planner position. Ms. Anderson reported recent events at Sikes Adobe and a sewage spill near the Bernardo Bay staging area last weekend. The spill is contained, and the City of San Diego is working on habitat remediation. She reported on the upcoming Volunteer Appreciation Party, and announced that the

JPA/Conservancy's joint Get-to-71 campaign reached their goal of \$2 million for the 13 miles of gaps in the Coast to Crest Trail.

**Public Comment** - Phil Pryde asked about having the CAC meetings on Zoom. CAC members discussed the idea and staff explained that IT support isn't available to conduct hybrid public meetings. Jan Fuchs asked about the lagoon wetlands and members discussed the recent stormwater flows. Maggie Brown suggested that members view the Friends' new website, which features local birds seen in the area. .

### **DISCUSSION/ACTION**

#### **1. Status of JPA FY 23-24 Budget Process**

Executive Director Anderson reported that she will be bringing the proposed FY23-24 budget to the JPA Board at the April 21, 2023 meeting. Ms. Anderson explained what factors go into the budget process and this year's economic challenges, JPA salaries, and endowments and strategies to keep the JPA sustainable. .

#### **2. Reach the Beach Trail**

Executive Director Anderson reported that the JPA received a \$24,000 grant from the Del Mar Foundation to design a Reach the Beach Trail and San Dieguito River Park Hubbell Gateway at the coast. Ms. Anderson explained the project location at the Fairgrounds along a recreational buffer secured by former State Senator Christine Kehoe. Anderson will present a draft plan to the CAC at an upcoming meeting

#### **3. Committee Reports**

a. **Project Review Committee** – Jan Fuchs reported that the PRC has not met recently and are unaware of upcoming projects. She mentioned the proposed project on the north coastal bluff in Del Mar that the PRC will want to track and review project details when available.

b. **Trails Committee** – Matt Cunningham reported that he is the new chair of the committee and the tentative date for the next meeting is May 2, 2023.

c. **Interpretation Committee** - Liz Gabrych reported that the Interpretation Committee met February 8, 2023 and that they have new members.

### **INFORMATION**

#### **4. Park and Project Status and Updates (oral)**

Executive Director Anderson reported that the Watershed Explorers Program has been very active. . February and March rains have forced JPA ranger staff to close SDRP trails on occasion to minimize damage and protect public safety and they are repairing trails.. She reported the large



bike race called BWR on April 16<sup>th</sup> will require some trails be temporarily closed during the race. Ms. Anderson reported the funding shortfall for final engineering and construction of the Osuna Trail and that she is seeking additional funds.

Jan Fuchs made the motion to adjourn the meeting and Jeff Barnouw seconded the motion at 12:15 pm.

DRAFT

## Agenda Item 1

June 2, 2023

**TO:** CAC

**FROM:** JPA Staff/Project Review Committee

**SUBJECT:** Draft EIR for El Camino Real Assisted Living Facility

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### **SUMMARY**

A Draft Subsequent EIR was released by the City of San Diego for a project called El Camino Real Assisted Living Facility for a 30-day public review period with comments due June 26, 2023 (Attachment 1). The project is the expansion of the existing St. John Garabed Armenian Church (Church) located on El Camino Real across from the Dust Devil Nature Trail and W-19 San Dieguito Lagoon Restoration Project. The proposed development is to add the proposed El Camino Real Assisted Living Facility (Assisted Living Facility) to the site between the church and the Stallions Crossing development adjacent to Gonzales Canyon (Attachment 2).

Three approved accessory buildings associated with the Church have not yet been constructed (timeline unknown). The Assisted Living Facility is a proposed 105,568 square foot (sf) building with 105 rooms and supporting amenities and is 40 feet tall (Attachment 3).

The CAC's Project Review Committee is currently reviewing the Subsequent EIR and plans to present their comments at the CAC meeting for the CAC's consideration.

In 2014, the CAC and JPA reviewed the EIR for the St. John Garabed Church project and JPA staff submitted an EIR comment letter subsequently endorsed by the JPA Board (Attachment 4). The church was built in 2021 largely as originally proposed. In January 2022, JPA staff submitted a NOP comment letter recommending that certain issues be evaluated in the El Camino Real Assisted Living project EIR (Attachment 5).

The Draft Subsequent EIR can be reviewed and downloaded from the City's website using the link in the EIR notice:

[https://www.sandiego.gov/sites/default/files/dsd\\_subsequent\\_environmental\\_impact\\_report\\_no.\\_675732.pdf](https://www.sandiego.gov/sites/default/files/dsd_subsequent_environmental_impact_report_no._675732.pdf)

#### Attachments:

1. City of San Diego Public Notice
2. Project Location Map
3. Proposed Project Site Plan and Elevations
4. St. John Garabed Church EIR JPA comment letters (4/18/2014 and 4/28/2014)
5. JPA staff NOP comment letter



THE CITY OF SAN DIEGO

DATE OF NOTICE: May 12, 2023

# NOTICE OF AVAILABILITY DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

DEVELOPMENT SERVICES DEPARTMENT

SAP No.: 24008715

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The City of San Diego (City), as Lead Agency, has prepared a draft Subsequent Environmental Impact Report for the following proposed project and is inviting your comments regarding the adequacy of the document. The draft Subsequent Environmental Impact Report and associated technical appendices have been placed on the City's California Environmental Quality Act (CEQA) web-site at <http://www.sandiego.gov/ceqa/draft>.

**HOW TO SUBMIT COMMENTS:** Comments on this draft Subsequent Environmental Impact Report must be received by close of business on June 26, 2023 to be included in the final document considered by the decision-making authorities. When submitting comments, please reference the project name and number (El Camino Real Assisted Living Facility/ 675732). The City requests that all comments be provided electronically via email at: [DSDEAS@SanDiego.gov](mailto:DSDEAS@SanDiego.gov). However, if a hard copy submittal is necessary, it may be submitted to: **Sara Osborn, City of San Diego Development Services Center, 1222 First Avenue, MS 501, San Diego, CA 92101.**

## GENERAL PROJECT INFORMATION:

- Project Name: El Camino Real Assisted Living Facility
- Project No. 675732
- SCH No. 2013071042
- Community Plan Area: North City Future Urbanizing Area (NCFUA) Framework Plan
- Council District: 1

**PROJECT DESCRIPTION:** The project consists of an expansion of the approved St. John Garabed Armenian Church (Church) to include the proposed El Camino Real Assisted Living Facility (Assisted Living Facility), to be located south of the approved Church. The project would include amending the Church's existing approvals to include the proposed Assisted Living Facility. More specifically, the Assisted Living Facility would require a Site Development Permit (SDP); a Conditional Use Permit (CUP) Amendment; an Uncodified CUP Ordinance; a Neighborhood Use Permit (NUP); a Coastal Development Permit (CDP) Amendment; and certification of the Final Subsequent EIR. The entire project site (existing Church and proposed Assisted Living Facility) is approximately 17.33 acres while the Assisted Living Facility is 3.97 acres. The Church has been constructed and operational. Three accessory buildings that would be associated with the Church have not yet been constructed. The Assisted Living Facility proposes a 105,568 square foot (sf) building with 105 rooms and supporting amenities. The three-story Assisted Living Facility would be 105,568 sf and 40 feet tall which would exceed the base zone 30-foot height limit. An additional 10 feet of building height is allowed per each 10 feet increase of setbacks per San Diego Municipal Code (SDMC) 131.0344. The Assisted Living Facility would provide greater than the minimum 20-foot setback from adjacent properties in accordance with the existing zoning of the site, Agricultural-Residential (AR-1-1). The Assisted Living Facility would also include 57 surface parking spaces and on-site landscaping and would retain 1.12 acres in

the eastern area of the parcel as open space, in accordance with the existing designated Multiple Habitat Planning Area (MHPA) area. This area would be covered by a Covenant of Easement and maintained as open space in perpetuity. The site is designated as Residential and Park, Open Space and Recreational Uses in the City of San Diego General Plan and zoned as AR-1-1, and is located within Subarea II of the NCFUA Framework Plan.

**The site is not included on any Government Code listing of hazardous waste sites.**

**APPLICANT:** PMB LLC

**RECOMMENDED FINDING:** The draft Subsequent Environmental Impact Report determined the proposed project would result in potential significant environmental effects in the following areas: **BIOLOGICAL RESOURCES, HISTORICAL RESOURCES, NOISE, AND TRIBAL CULTURAL RESOURCES.**

**AVAILABILITY IN ALTERNATIVE FORMAT:** To request this Notice, the draft Subsequent Environmental Impact Report, and/or supporting documents in alternative format, please email the Development Services Department at [DSDEASNoticing@sanidiego.gov](mailto:DSDEASNoticing@sanidiego.gov). Your request should include the suggested recommended format that will assist with the review of documents.

**Additional Information:** For environmental review information, contact Sara Osborn at (619) 446-5381. For information regarding public meetings/hearings on this project, contact Development Project Manager, Xavier Del Valle, at (619)557-7941. This Notice was published in the SAN DIEGO DAILY TRANSCRIPT and distributed on 5/12/2023.

Raynard Abalos  
Deputy Director  
Development Services Department

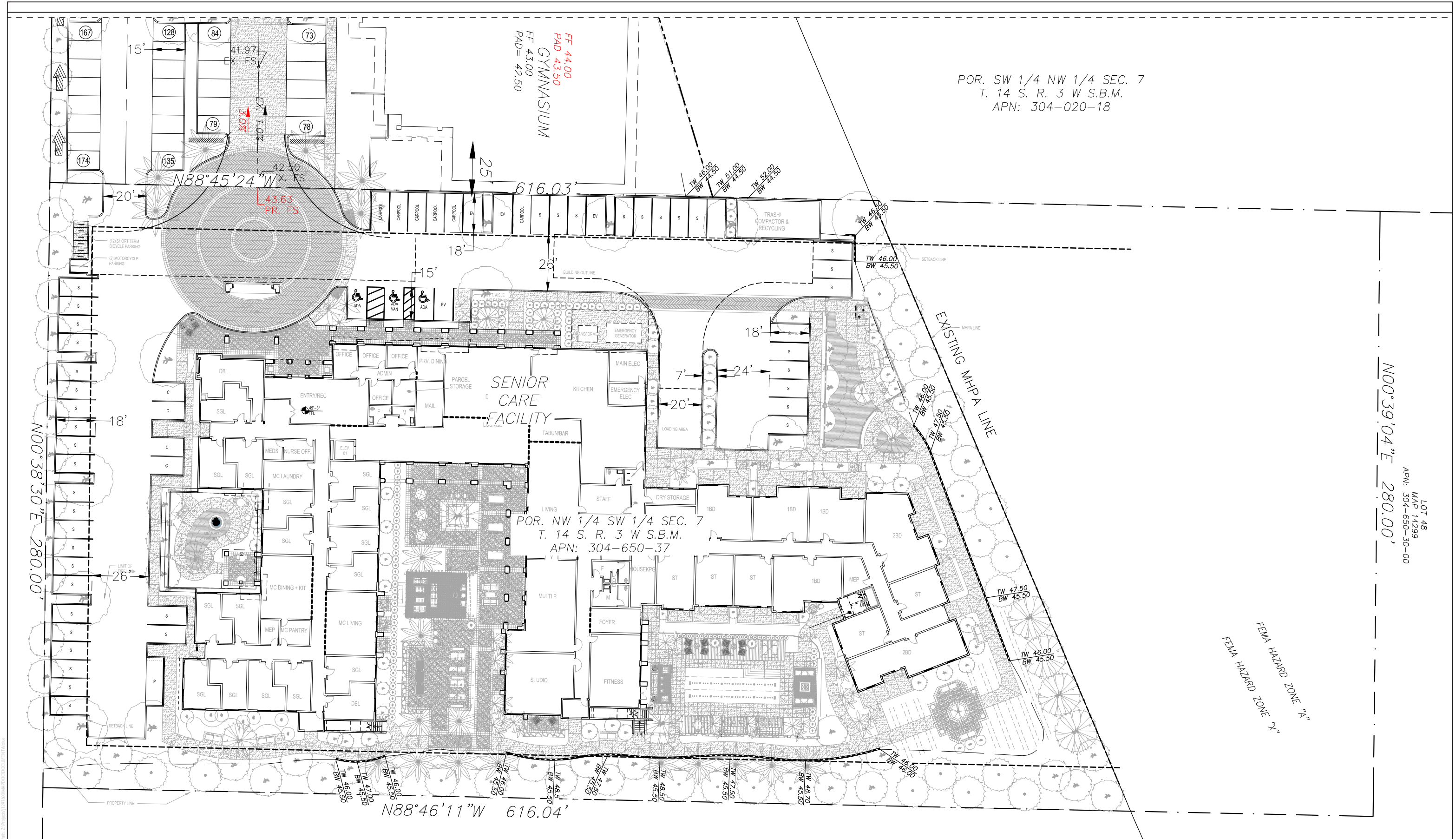




SOURCE: BING 2021







SOURCE: Leppert Engineering 2020

FIGURE 3-1

## Site Plan

El Camino Real Assisted Living Facility SEIR





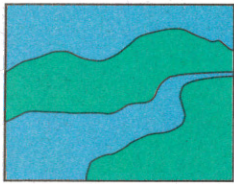
Aerial View from Southwest



Aerial View from Northwest

SOURCE: Leppert Engineering 2020





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Agenda Item 1  
June 2, 2023

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Dianne Jacob  
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Torn Golich  
Citizens Advisory Committee

Becky Bartling, Ex Officio  
22nd District Agricultural Assoc.

Dick Bobertz  
Executive Director

April 14, 2014

Jeffrey Szymanski  
Environmental Planner  
City of San Diego  
Development Services Center  
1222 First Avenue, MS 501  
San Diego, CA 92101

**Subject: Comments on Draft EIR for  
St. John Garabed Church; Project #240283**

Dear Mr. Szymanski:

Thank you for providing the JPA with the Draft EIR for this project. As you know, we have been following this project since it was originally submitted to the City in 2011 and have met with the project representatives on at least two occasions (2012) including a site visit to the project site. The issues we've raised on multiple occasions have not been adequately addressed (see attached letters). Despite repeated requests from JPA staff to modify the project's design to reduce impacts to the San Dieguito River Park the project has proceeded largely as originally proposed. The comments in this letter focus on the adequacy of the Draft EIR and are consistent with concerns previously raised.

Due to the timing of the Draft EIR public review period and the JPA Board meeting schedule, the JPA Board has not yet reviewed or approved these comments. Therefore, the comments are solely of the JPA staff based on our interpretation of the policies and programs adopted by the San Dieguito River Park JPA Board of Directors. It is anticipated that the JPA Board will consider these comments at their next meeting scheduled for April 18, 2014.

Our concerns relate to two main issues: the impact of the project on the MSCP Preserve area and on the visual quality of the San Dieguito River Park.

Impacts to MSCP Gonzales Canyon Wildlife Corridor:

The proposed structures are located on the edge of the mesa top directly adjacent to the Gonzales Canyon wildlife corridor, the closest structure being approximately 20 feet from the slope.

According to the Draft EIR, the project is proposing to develop 4.23 acres of the MSCP Preserve, 0.88 acre beyond the allowed 25% encroachment. This additional encroachment does not seem justified nor is it sensitive to the value of this area as a wildlife movement corridor and as a visually important component of the river valley landscape. Statements made in the Draft EIR regarding the



necessity to build the magnitude proposed are unsupported. Both recently-approved adjacent projects adhered to the MSCP Preserve boundaries.

- The Gonzales Canyon wildlife corridor identified in the City's MSCP and the SDRP Concept Plan comes out of Gonzales Canyon from the southeast and connects to the broad floodplain of the San Dieguito River Valley. Evidence of high wildlife use of this corridor was collected in March 2013 from recent camera traps (placed on the adjacent property) by the San Dieguito River Valley Conservancy. Mammals including bobcat, coyote, and mule deer, as well as numerous smaller species, use this corridor. The function and use of this wildlife corridor has become more important as the lagoon has been restored, as open space has been set aside and restored to native habitat as a result of adjacent projects (Rancho Valley Farms and Formosan Church), and as an improved wildlife undercrossing was installed under El Camino Real as a safe crossing of this busy roadway. The importance and high use of this corridor is not adequately documented in the Draft EIR.
- The Draft EIR does not sufficiently recognize the importance of the wildlife corridor or the diversity of species that currently move through the area and claims "the project would have a beneficial impact on the habitat linkage within Gonzales Canyon" while dismissing its impacts. It states that "the habitat on the site currently provides relatively few resources for wildlife due to the lack of cover and structural diversity" (page 5.4-11). This is contrary to recent evidence of a heavily used corridor. Although the proposed mitigation plan would improve the habitat, the project's adjacency to the corridor would impact its quality and function. The proposed buildings and activity areas could be reduced in size and moved further away from the mesa edge to provide a buffer. The EIR does not adequately explain why the project couldn't be built on a smaller footprint to provide an adequate buffer.
- The EIR and accompanying biology report are misleading with the use of the term "active agriculture" throughout the text to describe land use on the site. Agriculture operations (ie, crops) have not existed onsite for several years. Active agriculture evokes an image where monotypic stands of productive crops are planted and weeds kept down with herbicides, which is not occurring at the site. The EIR concludes that "the area in the lower portion within Gonzales Canyon is unaffected by the take and management will be unaffected" (page 5.1-73) with no substantive evidence or analysis to support such a conclusion. The EIR states that the area "is periodically in crops or is devoid of vegetation and disked" (page 5.1-73). However, based on our observations most of the project site had not been farmed for several years and mature native vegetative cover did exist in the bottom portion of the corridor closest to the wildlife undercrossing before it was recently mowed and disked (no crops were planted), just prior to the release of the NOP.
- The EIR does not acknowledge that native habitat on the project site in the wildlife corridor was recently mowed and disked without authorization and claims that Gonzales Canyon has "currently no cover or foraging opportunities for wildlife". The mowing and disking took place in May or June of 2013 under the current ownership where sensitive



native habitat was destroyed during the nesting season and just prior to the release of the NOP.

- The EIR does not acknowledge the impact of the project on the corridor itself and only promotes the benefits of the mitigation plan (page 5.1-72 and 73). The EIR also states that the project would “not compromise the preserve efficiency or effectiveness” and “no impacts will occur to the habitat linkage” because the project would be confined to the mesa on existing disturbed land. Edge effects to the wildlife corridor are dismissed and conclusions are not substantiated with evidence. The EIR states that the project mitigation to restore/enhance 1.76 acres of onsite habitat will “vastly improve the function of the canyon for wildlife movement” (page 5.1-72). While there is no question that restoration improves habitat value for wildlife, the corridor had been heavily used by wildlife for years (including mule deer, bobcat, and coyote). It is likely that wildlife use has declined since the vegetation was mowed and disked in 2013. The EIR does not adequately analyze the impact of the project design or the loss of a buffer from the corridor. The supposed net benefit of the mitigation plan to the wildlife corridor is unsubstantiated (considering the adjacency edge effects of the project) and the EIR analysis does not adequately support the conclusion made.
- As currently designed the project does not provide a buffer between development and wildlife habitat and will introduce light, noise, and human activity, potentially intimidating to the wildlife moving through the area. The biology analysis does not support the conclusions made. For example, a statement is made that the project “is separated from the Gonzales Canyon by a 20-40 foot slope which will protect wildlife as they move through the canyon”, yet it does not explain how that slope would protect wildlife next to a 93-foot tall structure at the edge of that slope and next to the proposed project access road cut into the slope, nor whether the project’s proximity and use would impact wildlife moving through the corridor.
- The proposed project entrance off El Camino Real would also be located within the MSCP Preserve approximately 400 feet north of the Formosan Church entrance driveway. This access will isolate the habitat mitigation site that was required for the adjacent Formosan church (which currently is within the Preserve) and will shine automobile lights, and add noise directly adjacent to the wildlife corridor particularly at night when animals move through the area. Although lights and noise from El Camino Real pass by the open space, the access road will bring cars directly into the Preserve area. The access entrance drive is only evaluated in the context of a location further into the MHPA Preserve that had been previously proposed by the project representative and subsequently rejected. The EIR dismisses impacts of the access road by promoting it as better than what had been considered previously (page 5.1-72). CEQA requires that the analysis be based on the impacts of a proposed project on the existing condition and setting, not compared to an earlier design. Typically, the existing condition is defined as when the notice of preparation is published (in this case, July 2013). The most sensitive portion of the project site, where mature vegetation offered cover for wildlife species, was mowed and disked, just prior to the release of the NOP.



- The EIR makes inaccurate statements and cites mitigation measures that don't exist. For example, only one biology mitigation measure exists (BIO-1) yet the analysis states that measures "BIO-2" and "BIO-3" would mitigate impact from invasive species and impacts to the MSCP, yet these measures do not exist.
- The EIR states that exterior lighting would provide "general illumination" of proposed plazas, along pathways, and around landscape areas, and at entry points at the structures. The intensity of lighting proposed is not provided in the Draft EIR. It goes on to say that compliance with the City's Outdoor Lighting Regulations would reduce impacts to less than significant, yet no explanation is given on the details of that regulation and how compliance would mitigate lighting impacts (page 5.9-17). These potential edge effects are not adequately analyzed in the DEIR and the conclusion that impacts would be insignificant is not supported with substantial evidence.

Impacts to the Visual Open Space Character of the River Valley:

The EIR states that deviations from the AR-1-1 zone "base maximum height" of 30 feet are allowed in circumstances where side yard setbacks are increased (as proposed for the church and hall). But, deviations for side and rear yard setbacks are also being requested for the education and youth center buildings. The community plan and SDRP Concept Plan policies regarding protection of visual quality and open space must also be considered. Height deviations are discretionary and should be considered in the context of the goals and policies of the SDRP Concept Plan. Given the constraints on the project site, the sensitivity of the surrounding area both biologically and visually, the site's prominent location within the San Dieguito River Valley, the visibility of the site from public views (trails and roads), and the goals and policies of the FUA Framework Plan and SDRP Concept Plan that protect open space, valleys, and wildlife, the project appears to be overbuilt for the site.

Specific Draft EIR comments are:

- The project is inconsistent with the land use plans and policies for this area that were written to protect views into and from the San Dieguito River Valley. Policies in the NCFUA Framework Plan and SDRP Concept Plan require developments to be "low lying in profile and not visually prominent" in this part of the valley. The EIR states that the church "would be visually prominent from low-laying areas of the western side of Gonzales Canyon", but that the structures "will be screened with landscaping that will include native shrubs and groundcover, grasses, lawn, etc." and "the stone finish or plaster finish with earth-tone colors" would "tend to recede into the background landscape with distance" and that the church has been "set back from the property line to the extent possible". The proposed landscaping cannot screen a 93-foot tall structure that would greatly exceed the height of most plantings and surrounding buildings and loom over the adjacent wildlife corridor. Furthermore, reasons given that the square footage is the minimum necessary to meet the goals of the project lack substantial evidence to justify the need to impact the river valley's visual quality to such an extent.



- The Draft EIR concludes that “based on the visual analysis presented and based on the discussion of scenic views/vistas, the project would not be located in a highly visible area” and “would not contrast visually with the overall character of the surrounding area” (page 5.9-15). These conclusions are false and appear to be based on poor-quality visual simulations that show the proposed structures faded in the distance. The church structure itself would be more than two times higher than the adjacent church and four times the height of the neighboring residential structures. Substantial evidence is lacking to support conclusions reached in the EIR.
- At the same time, the EIR also states that the project would have a significant and unavoidable impact on neighborhood character because the church dome is 50 feet higher than the adjacent church and 70 feet higher than the adjacent residential development (page 5.9-16). Confusing statements are made to support this conclusion: “though portions of the proposed church will be visible from adjacent properties, with landscaping and natural building materials and colors, the project would not be located in a highly visible area and contrast with the overall character of the area”. And “because the proposed 93-foot tall dome would be taller than surrounding development and would result in visible contrast” impacts are “considered significant and unavoidable” (page 5.9-16). It appears that impacts to surrounding private developments were considered to be a significant impact, yet impacts to surrounding public views into and from the river valley were not.
- A modified design that reduces the height of the structures would mitigate the high impact this project would have on the open space character of the San Dieguito River Valley (see next comment).

#### Project Alternatives Analysis

CEQA requires that an EIR provide feasible project alternatives capable of “avoiding or substantially lessening any significant effects of the project” while feasibly attaining most of the project objectives (Section 15126.6). The subject EIR dismisses the “Reduced Project Alternative” as not feasible without defining or explaining the characteristics of the “reduced project”, and only states that it would not meet the needs of the Armenian Church community without substantiating the conclusion with evidence. An alternative that meets the MSCP encroachment allowance of 25% and moves the structures further back from the mesa away from the wildlife corridor to provide a buffer from Gonzales Canyon, thereby reducing significant impacts to the MSCP Preserve, should be analyzed as a viable alternative.

A project alternative design consistent with the height of the surrounding structures (i.e., 45 feet) should also be included to mitigate impacts to the surrounding area. The EIR does not offer or meaningfully consider such alternative designs.

#### Trail Connection

According to City Park and Recreation planning staff, a proposed condition on the subject project requires the property owner to grant a recreation easement for trail purposes. According



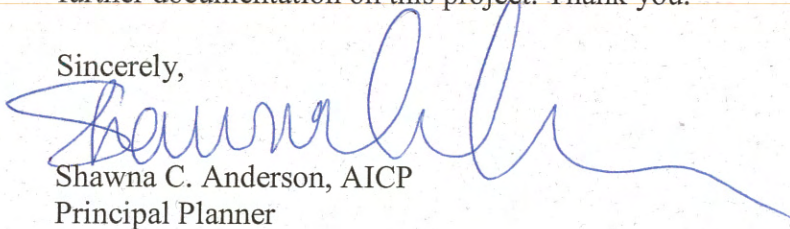
Mr. Szymanski  
Page 6

to the project Cycle Issue Report, "the exact location of the easement will be determined at a later date and the property owner will not be responsible for the cost associated with granting, constructing or maintenance of the trail". The EIR should acknowledge and discuss the future trail even if an exact alignment hasn't been determined. Our concern is that the EIR does not acknowledge the trail use on the subject property, potentially jeopardizing its status and ability to continue the trail in the vicinity of the proposed mitigation site.

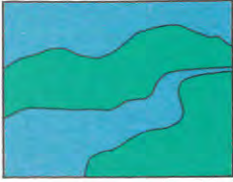
We urge the City as part of the San Dieguito River Park and an active participant in the restoration of the lagoon area to consider our comments and the impact this project design will have on the long-recognized goals to protect the open space and visual quality of the San Dieguito River Valley.

We appreciate the opportunity to comment on the Draft EIR and look forward to receiving further documentation on this project. Thank you.

Sincerely,



Shawna C. Anderson, AICP  
Principal Planner



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Agenda Item 1  
June 2, 2023

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Supervisor, County of San Diego

Tom Golich  
Citizens Advisory Committee

Becky Bartling, Ex Officio  
22nd District Agricultural Assoc.

Dick Bobertz  
Executive Director

April 28, 2014

Jeffrey Szymanski  
Environmental Planner  
City of San Diego  
Development Services Center  
1222 First Avenue, MS 501  
San Diego, CA 92101

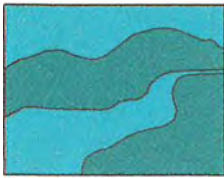
**Subject: Comments on Draft EIR for  
St. John Garabed Church; Project #240283**

Dear Mr. Szymanski:

At their April 18, 2014 meeting, the JPA Board of Directors considered the St. John Garabed Church Draft EIR and unanimously confirmed the EIR comments submitted by our staff in their April 14, 2014 letter to you. We do appreciate the fact that the applicant has made modest changes to the project since it was originally submitted in response to concerns that were raised. Considering that there remain substantial JPA concerns on this project that have not been addressed, we request that City staff and the applicant work together to resolve what are perceived as impacts to the function and quality of the San Dieguito River Valley. If desired, the JPA staff will participate in that effort. The JPA will continue to protect the vision of the San Dieguito River Park and we look forward to working with our future new neighbors to do the same.

Sincerely,

County Supervisor Dave Roberts  
JPA Board Chair



San Dieguito River Park  
Joint Powers Authority  
18372 Sycamore Creek Road  
Escondido, CA 92025  
(858) 674-2270 Fax (858) 674-2280  
[www.sdrp.org](http://www.sdrp.org)

January 13, 2022

Sara Osborn  
City of San Diego  
Development Services Dept.  
1222 First Avenue, MS 501  
San Diego, CA 92101

**Subject: El Camino Real Assisted Living Facility at the St. Garabed Church/  
No #675732**

Dear Ms. Osborn:

Thank you for notifying the San Dieguito River Park's Joint Powers Authority (JPA) staff regarding the preparation of a Draft EIR for this project. The JPA staff has followed the progression of this proposed project over the last year as well as the adjacent church development previously. The project has the potential to impact many resources with respect to the San Dieguito River Park and the area's natural resources that we strive to conserve. With the new uses that are proposed, we agree that a preparation of an EIR is appropriate, with this being the most detailed type of CEQA document.

As stated in the San Dieguito River Park's Concept Plan, the goals and objectives include *the preservation of open space, conservation of sensitive resources, protection of water resources, preservation of the natural floodplain, retention of agricultural uses, creation of recreational and educational opportunities*. The project site is located within the San Dieguito River Park's Focused Planning Area and near several of the park's trails including the Coast to Crest Trail and the Dust Devil Nature Trail. We are concerned that the proposed project may not be consistent with the San Dieguito River Park Concept Plan, which was formally acknowledged and accepted by the City of San Diego per City Resolution 301582 (attached).

We believe it is appropriate that the Draft EIR address the following issues:

*Issue:*

According to the City Project Cycle reviews and Notice of Preparation and scoping meeting information, the proposed project would consist of a 3-story, 105,568 sq. ft. mission revival architecture assisted living facility. There is a 30-foot maximum height limit in the AR-1-1 zone. This height limit is also recommended in the Concept Plan design guidelines. It appears the bulky architecture and scale of the proposed project may not be consistent with zoning and land use plans, particularly combined with the large-scale neighboring church and approved buildings. We are concerned with the height of the facility and how the project would be compatible in respect to the adjacent natural resources, neighborhood characteristics, and the viewshed of the river valley including the lagoon view.

*Analysis:*

Please analyze these issues and explain the consistency of the proposed project with the zone and land use plans for the area, including height limits and applicable plans. These issues should be analyzed in the Aesthetics and Land Use Planning sections of the Draft EIR.

*Issue:*

Please address the population increase of hundreds of new residents, visitors, and staff and its impact on traffic flow, pedestrian, bicycle, equestrian and vehicular safety, and access. The EIR should also address how the use would affect access to the nearby trails.

*Analysis:*

These concerns should be analyzed in the Greenhouse Gas Emissions, Public Services, Recreation, Transportation, Population and Housing sections of the Draft EIR.

*Issue:*

The mouth of Gonzales Canyon, where the proposed project is located, and which feeds into the San Dieguito Lagoon is a documented wildlife corridor. Thus, the JPA has an interest in seeing that this project does not adversely impact the sensitive resources of the corridor and San Dieguito River Valley. The San Dieguito River Park Concept Plan development guidelines (Appendix D Part II) should be followed to be more consistent with the Park's Concept Plan. The Concept Plan was formally acknowledged and accepted by the City of San Diego per City Resolution 301582.

*Analysis:*

Please analyze how the project would affect the wildlife corridor. In addition, the biological analysis for this Draft EIR should include sufficient detail to assess the function of the existing wildlife corridor. The Draft EIR should provide a thorough analysis of the project's potential impacts to this corridor, particularly from edge effects including human activity, lighting, and noise, and how introducing a high-intensity use would affect the corridor's function. It also must document if the project is in a MSCP-identified corridor and provide adequate data to justify encroachment into the MHPA of this magnitude if so, including evaluating whether the project is consistent with the MSCP Adjacency Guidelines.

*Issue:*

The project site location is in a sensitive and unique part of San Diego, in a designated agriculture land use zone which is intended for open space and low-density dwelling units, per the North City Future Urbanizing Area (NUFUA) framework plan, MHPA, and within the San Dieguito River Park's Focused Planning Area. The proposed project does not appear to be consistent with these established zones, land use policies, and areas. The Concept Plan was meant to complement the area's existing zones with the aim of preserving the river valley character and environment.

*Analysis:*

Please analyze land use changes, loss of agriculture land in the Aesthetics, Agricultural Resources, Land Use Planning, and Biological Resources.

*Issue:*

The cumulative effects of the proposed project could permanently alter this distinct area's neighborhood character. The proposed project in combination with the adjacent uses would be a cumulatively substantial change to the area.



*Analysis:*

Please analyze how the proposed assisted living facility use combined with the surrounding uses (two recently constructed large buildings and approved church facility complex) would cumulatively impact aesthetic resources. Also please address piece-mealing, considering that this project and the adjacent church are both on church properties.

In addition, the Draft EIR should explain and evaluate the project's consistency with Prop A.

The JPA voiced its concern several years ago that the proposed neighboring church would set a precedent to further development in this area of the San Dieguito River Valley. Many government agencies, local citizens, and non-profit organizations have worked hard over the years to conserve and restore this unique part of San Diego. These efforts include preservation of the adjacent San Dieguito Lagoon, restoration of over 150 acres of adjacent tidal wetland habitat in 2012, the new phase II 80-acre wetland restoration project that Caltrans just kicked off this month, and other projects that contribute to the conservation and restoration of the San Dieguito River Valley. We hope that city staff will take the vision and legacy that has shaped this area into consideration when evaluating this project's potential impacts.

Thank you for keeping the JPA informed on this project, and we look forward to receiving the Draft EIR.

Sincerely,

A handwritten signature in black ink, appearing to read "Ayden Zielke". The signature is fluid and cursive, with the first name "Ayden" and last name "Zielke" clearly distinguishable.

Ayden Zielke, MURP  
Environmental Planner

Reference:

San Dieguito Concept Plan (adopted 1994, revised 2002). Available at:  
<http://www.sdrp.org/wordpress/wp-content/uploads/SDRP-Concept-Plan.pdf>. Accessed  
January 2022.



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**INTERIM EXECUTIVE DIRECTOR**

Emily Kochert

3030 Bunker Hill St.  
Suite 309-1  
San Diego, CA 92109  
Ph. (858) 866-6956  
sdrvc@sdrvc.org  
www.sdrvc.org



January 14, 2022

Sara Osborn  
City of San Diego  
Development Services Dept.  
1222 First Avenue, MS 501  
San Diego, CA 92101

Subject: El Camino Real Assisted Living Facility at the St. Garabed Church/  
No #675732

Dear Ms. Osborn:

Thank you for the opportunity to review the proposed project. The San Dieguito River Valley Conservancy (SDRVC) Board has voted to support the recommendations of the San Dieguito River Park JPA staff and concur with its comments (see attached).

SDRVC is a 501(c)(3) non-profit that has been working to preserve and protect the valuable resources of the San Dieguito River watershed since 1986. We own five parcels that surround the lagoon that would be affected by the proposed project.

We strongly urge you to consider the San Dieguito River Park staff's recommendations and comments. If you have any questions, please contact me at (312) 805-2103 or jimsmith@gmail.com.

Sincerely,

Jim Smith  
President