

CALIFORNIA COASTAL COMMISSION

SAN DIEGO AREA
7575 METROPOLITAN DRIVE, SUITE 103
SAN DIEGO, CA 92108-4402
(619) 767-2370



W14a

Click here to go to
original staff report

Addendum

May 4, 2016

To: Commissioners and Interested Persons

From: California Coastal Commission
San Diego Staff

Subject: Addendum to **Item W14a**, Coastal Commission Revised Findings **#6-15-0142 (St. John Garabed Armenian Apostolic Church Trust)**, for the Commission Meeting of May 11, 2016.

Staff recommends the following corrections be made to the above-referenced staff report, with deletions marked by a ~~strike through~~ and additions shall be underlined:

1. On Page 19 of the staff report, the final paragraph should be corrected as follows:

However, while the proposed buildings heights are permitted by the underlying zone, the development would be significantly taller than any of the surrounding developments, and the height, bulk, and scale of the proposed structures raise ~~serious~~ concerns regarding community character and the contrast with the surrounding natural setting.

2. The final paragraph on Page 32 and the first paragraph on Page 33 of the staff report shall be corrected as follows:

The FEIR adopted for this project concludes that the proposed visual impacts associated with the proposed development are significant and unavoidable and the analyzed alternatives are infeasible. Thus, the City adopted overriding considerations based on the economic, social, and other benefits of the proposed project. Specifically, the City found that the proposed development will promote cultural and religious awareness, will provide a public gathering space, will restore native habitat within Gonzales Canyon, and will provide jobs for area residents, which outweighs the significant visual impacts. However, the standard of review for the coastal development permit is Chapter 3 of the Coastal Act. As ~~proposed~~ conditioned, the development would ~~neither~~ be visually compatible with the surrounding area ~~nor~~ and subordinate to the character of its setting, and ~~inconsistent~~ with Section 30251 of the Coastal Act.

~~Therefore, †~~The proposed project has been conditioned in order to be found consistent with the Chapter 3 policies of the Coastal Act. ~~M~~ with mitigation measures; including conditions that ~~reduce the height and~~ address the exterior treatment and screening of the proposed development, which will minimize all adverse environmental impacts. As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project, as conditioned, is the least environmentally-damaging feasible alternative and can be found consistent with the requirements of the Coastal Act to conform to CEQA.

CALIFORNIA COASTAL COMMISSION

SAN DIEGO AREA
7575 METROPOLITAN DRIVE, SUITE 103
SAN DIEGO, CA 92108-4421
(619) 767-2370



W14a

Staff: L. Schlembach-SD
Staff Report: 4/21/2016
Hearing Date: 5/11/2016

REVISED CONDITIONS AND FINDINGS

Application No.: 6-15-0142

Applicant: St. John Garabed Armenian Apostolic Church Trust

Agent: Atlantis Group LLC

Location: 13925 El Camino Real, North City, San Diego, San Diego County (APN 304-020-24)

Project Description: Construction of a church complex including a 8,740 sq. ft., 85-ft. tall church topped by an 8-ft. high cross; a 17,185 sq. ft., 40-ft. tall multi-purpose hall; a 13,150 sq. ft., 28-ft. tall youth/recreation center; a 10,460 sq. ft., 28.5-ft. tall cultural/education building; and a 176-space parking lot. A new 140-ft. long right hand turn lane and 960-ft. long acceleration lane would be added to El Camino Real and 1.95 acres of habitat/wetland restoration would take place on the 13.4-acre previously agricultural parcel.

Staff Recommendation: Approval with Conditions

STAFF NOTES

Staff recommends the Commission adopt the following revised findings in support of the Commission's action on January 14, 2016. In its action, the Commission approved the permit and eliminated Special Conditions #1a and 1b, which would have required that the

proposed church be lowered in height to no greater than 50 feet in height, and reconfigured the arrangement of proposed buildings to be sited in order from shortest to tallest from north to south. The amended motion begins on Page 8. The modifications to the Special Conditions begin on Page 9. Findings to support these modification can be found starting on Page 16.

Commissioners on Prevailing Side: Bochco, Cox, Groom, Howell, Kinsey, Luevano, McClure, Mitchell, Turnbull-Sanders, Uranga, Vargas

SUMMARY OF STAFF RECOMMENDATION **SUMMARY OF COMMISSION ACTION**

~~Staff is recommending approval of the proposed development with a redesign requiring an overall reduction in height of the proposed church building and reconfiguration of the four proposed buildings in order to reduce the adverse visual impacts of the proposed development. Other special conditions protect water quality and biological resources.~~

The proposed project is development of a large church complex consisting of four main buildings: a 85-ft. tall church topped by an 8-ft. high cross; a 40-ft. tall multi-purpose hall; a 28-ft. tall youth/recreation center; and a 28.5-ft. tall cultural/education building located on the inland side of El Camino Real in the North City planning area of the City of San Diego. The site is vacant land previously used for agriculture. Development of the site would include grading, parking, landscaping, and a new right hand turn lane and a new acceleration lane on El Camino Real. The proposed development is intended to serve the Armenian congregation in San Diego County.

The primary Coastal Act issues associated with this project include the proposed visual impacts of a large development in a highly scenic river valley. The 13.4-acre subject site is located east of Interstate 5 on the inland side of El Camino Real in the scenic San Dieguito River Valley, and is highly visible from all of these areas. The subject site is surrounded primarily by open space area, including Gonzales Canyon to the east and the San Dieguito Lagoon River Valley to the north and west on the seaward side of El Camino Real. The river valley contains the San Dieguito Lagoon system, the SONGS San Dieguito Wetland Restoration Project, and ample public access and recreation opportunities such as trails, vistas, and the site of the JPA's future visitor center.

The Commission has historically worked to ensure that the character of scenic areas is maintained by ensuring adjacent development is designed in a manner to be visually compatible with the habitat and subordinate to the surrounding natural setting. The existing development in the area is mostly limited to the inland side of El Camino Real, where the subject development is proposed, and includes the Evangelical Formosan Harvest Evangelical Church of San Diego to the southwest, the Stallion's Crossing residential development to the south, and a Pardee residential development to the east. These existing developments, all closely reviewed by the Commission for their visual impacts on the surrounding natural setting, are primarily less than 33 feet tall. As

proposed at a maximum of 93 feet tall, the subject development would be significantly taller than any of the surrounding developments.

However, in this particular case, the proposed project would not have a significant, adverse visually contrast with the surrounding natural open space, and nor would it set an adverse precedent for the remaining developable properties in the area. Consistent with the existing pattern of development, the proposed development will be located on the inland side of El Camino Real, in close proximity to other existing development. The subject site is 2 miles, as the crow flies, inland from the shoreline, and there are no public views across the site towards the lagoon or the ocean. Although the development will clearly be very visually prominent, it will be partially behind the existing Harvest Evangelical Church, and, as conditioned, will have substantial amounts of landscaping, which will help soften the impact of the large buildings. There are only two developable properties in the area surrounding the subject site, and there are not sufficient setbacks on either site to allow for building heights similar to the subject project, so additional structures of this prominence are unlikely to be constructed in this area in the future.

Staff provided comments on the draft Environmental Impact Report (EIR) prepared for the project, identifying the visual impacts of the project as a potential Coastal Act conflict. The Final EIR concluded that the visual impacts associated with the development as proposed would be significant, and analyzed a maximum 45-foot tall “Reduced Height” alternative that was identified as the environmentally preferable alternative. However, this less-impactful alternative was dismissed in the FEIR as it did not meet all of the applicant’s stated project goals, and the City adopted overriding considerations for what is described as significant unavoidable visual impacts of the proposed project. ~~Although allowable under the development regulations for the site’s zoning due to the increased sideyard setbacks proposed, there are alternatives for reducing the significant visual impacts of the proposed 85-foot tall church that would bring the project into compliance with the Coastal Act.~~

However, There are a variety of ways in which the visual impact of structures can be mitigated, including limiting the height, bulk, and scale of the structures, appropriate siting, coloring, landscape screening. The applicant is proposing to incorporate some of these measures into the project, including, as noted, significant amounts of landscaping. However, Thus, while the proposed complex, in particular, the 85-foot tall church, has specifically been sited and designed to be a highly prominent, cultural and religious symbol visible for miles around, the adverse impact to the visual quality of the region will be minimal. Additionally, a reconfiguration of the buildings is infeasible because the applicant has stated such a reconfiguration would not meet their project goals of having a highly visible iconic structure that visually represents their Armenian cultural heritage.

~~Staff is certainly sensitive to the applicant’s (and indeed, any applicant’s) desire to provide a landmark building. While occasionally controversial, San Diego County’s visual landscape would doubtless be less rich without the various iconic buildings such as the Mormon temple on Interstate 5, the downtown library dome, and the turrets, towers and cupolas of the Hotel del Coronado. However, all of these buildings are located in urbanized areas. The Coastal Act recognizes that just as valuable to the quality of the~~

~~visual environment are the open scenic vistas, natural colors, and sights associated with lagoons and other natural areas. In these areas, it is the buildings, roads, and infrastructure that are not visible that protect and maintain visual quality.~~

Thus, staff is recommending two major changes to the proposed project: reducing the overall height of the church to no higher than 50 feet, and reconfiguring the four buildings such that they are sited in order from shortest to tallest from north to south. Fifty feet is still higher than the 30-foot high limit in effect in most of San Diego County, is taller than any of the surrounding structures, and will still result in a highly visible building. However, it will reduce the visibility of the church while allowing the structure to maintain the verticality the applicant has described as important in traditional Armenian church architecture. Staff's recommendation requires specifically that the portions of the roof originally proposed at 50 feet be reduced to no higher than 40 feet, and the dome feature lowered such that the highest point originally proposed at 85 feet is no higher than 50 feet (see Exhibit #9). With this height reduction and site reconfiguration, the bulk of the church building would be 40 feet tall, and thus, would be far more compatible with the surrounding development and partially screened by the adjacent Formosan church development, which is a maximum height of 43 feet.

~~Staff believes these modifications would reduce the significant visual impacts of the proposed project and improve its compatibility with the surrounding area and developments, while still achieving the project goals as the dome and cross feature would be retained but at a reduced height. The verticality of traditional Armenian church architecture, which the applicant has cited as a necessary project design feature, would be still be achieved with the tiered roof level design similar to that proposed, but at a reduced height that will reduce significant visual impacts. Reducing the height of the proposed church as such would not eliminate any of its functionality or capacity, as its proposed height is a result of vaulted ceilings and architectural features rather than usable floors, and meets all of the stated project goals as the traditional Armenian architecture and verticality will be maintained.~~

~~The second modification to the proposed development that staff is recommending is a reconfiguration of the four proposed buildings such that they are sited in order from shortest to tallest from north to south, which would place the church (the tallest building) in the southernmost portion of the subject site where it would be partially screened by the adjacent Formosan Church(see Exhibit #15). Reconfiguring the site plan such that the church is located in the southernmost portion of the building pad would not completely hide the church as portions of the structure would still be taller than the adjacent church and proposed buildings, but would result in a stair-step transition such that the proposed buildings decrease in height as they approach the open space system to the north and thus would be increasingly subordinate to the natural setting. All other uses would remain exactly as proposed, with the only changes being the height of the church building and the arrangement of the four buildings.~~

Other Coastal Act concerns with this project include impacts to native vegetation and coastal water quality, and conversion of agricultural land. The project site lies partially within the City's Multi-Habitat Planning Area (MHPA), and contains several native

vegetation communities and a wildlife corridor. The portion of the site proposed for development has been used for agriculture in the recent past, and partially encroaches into the MHPA. However, the applicant has indicated that the site is no longer viable for agricultural uses, and as this portion of the site is a plowed field with no sensitive biological resources, the City approved a boundary line correction to realign the MHPA boundary outside of the area proposed for development. The only development proposed on the remainder of the site is 1.95 acres of habitat and wetland restoration to compensate for the loss of MHPA. Impacts to 0.03 acres of native coastal sage scrub (CSS) will occur from the proposed entry driveway, but the Commission's staff ecologist determined this area is not ESHA and nevertheless will be mitigated with the proposed on-site habitat and wetland restoration. The proposed development will result in a significant amount of new impervious surface, and the Commission's water quality experts have reviewed the project and determined that coastal water quality will be protected with implementation of temporary and permanent best management practices (BMPs), including low impact development mechanisms to the extent feasible.

Therefore, to minimize or avoid any potential adverse impacts to coastal resources, Commission staff is recommending nine special conditions that require (1) revised final plans that are in substantial conformance with the plans submitted by the applicant. ~~reduce the height of the proposed church as described above and reconfigure the proposed buildings such that that they are sited in order from shortest to tallest from north to south;~~ (2) final landscape plans that include maximal landscape screening; (3) exterior treatment of the proposed buildings with earth-tone colors to blend with the natural landscape; (4) evidence of recordation of a covenant of easement or dedication in fee title to the City of San Diego for the remaining undeveloped portion of the site within the MHPA; (5) a future development restriction to ensure any improvements or additional uses proposed on this site will not impact coastal resources; (6) a final restoration and monitoring plan to ensure successful implementation of the proposed restoration; (7) final drainage plans and (8) a construction BMPs plan to ensure short and long-term protection of coastal water quality; and (9) recordation of a deed restriction against the property that imposes the conditions of the permit for the purpose of providing notice to future property owners.

Commission staff recommends **approval** of coastal development permit application 6-15-0142 as conditioned.

TABLE OF CONTENTS

I.	MOTION AND RESOLUTION.....	8
II.	STANDARD CONDITIONS.....	9
III.	SPECIAL CONDITIONS.....	9
IV.	FINDINGS AND DECLARATIONS.....	16
	A. PROJECT DESCRIPTION.....	16
	B. VISUAL RESOURCES.....	18
	C. BIOLOGICAL RESOURCES.....	25
	D. WATER QUALITY.....	29
	E. NEW DEVELOPMENT/TRAFFIC/AGRICULTURAL USE.....	30
	F. LOCAL COASTAL PLANNING	34
	G. CALIFORNIA ENVIRONMENTAL QUALITY ACT.....	35

APPENDICES

[Appendix A – Substantive File Documents](#)

EXHIBITS

[Exhibit 1 – Vicinity Map](#)

[Exhibit 2 – Maximum Height of Surrounding Development](#)

[Exhibit 3 – Adjacent Protected Open Space Areas](#)

[Exhibit 4 – Development Potential of Surrounding Parcels](#)

[Exhibit 5 – Proposed Site Plan](#)

[Exhibit 6 – Project Rendering](#)

[Exhibit 7 – Proposed Landscape Plan](#)

[Exhibit 8 – Proposed Church Elevations](#)

[Exhibit 9 – Staff Recommended Reduced Height Church Elevations](#)

[Exhibit 10 – Proposed vs. Reduced Height Church Elevations](#)

[Exhibit 11 – Proposed Church vs. ~~Fermosan~~ Harvest Evangelical Church of San Diego Elevations](#)

[Exhibit 12 – Reduced Height Church vs. ~~Fermosan~~ Harvest Evangelical Church of San Diego Elevations](#)

[Exhibit 13 – Proposed Multi-Purpose Hall Elevations](#)

[Exhibit 14 – Setback Deviations and Height Increases Approved by City](#)

[Exhibit 15 – Staff Recommended Site Reconfiguration](#)

[Exhibit 16 – Commission Staff 4/14/2014 Comment Letter on Draft EIR](#)

[Exhibit 17 – Site Visit Photos](#)

[Exhibit 18 – Submitted Visual Impacts Analysis](#)

[Exhibit 19 – Applicant Response to Special Condition #1](#)

[Exhibit 20 – Biological Resources Map](#)

[Exhibit 21 – MHPA Take and Boundary Correction](#)

[Exhibit 22 – Proposed Wetland Restoration Plan](#)

[Exhibit 23 – Ex Partes](#)

[Exhibit 24 – Applicant’s Commission Briefing Book](#)

[Exhibit 25 – Acceleration Lane Landscaping](#)

[Exhibit 26 – Letters of Support](#)

[Exhibit 27 – Letters of Support](#)

[Exhibit 28- Ex-Parte Communication Disclosure Forms](#)

I. MOTION AND RESOLUTION

Motion:

I move that the Commission adopt the revised findings in support of the Commission's action on January 14, 2015, concerning approval of Coastal Development Permit No. 6-15-0142.

Staff recommends a YES vote on the foregoing motion. Passage of this motion will result in adoption of revised findings as set forth in this staff report. The motion requires a majority vote of the members from the prevailing side present at the revised findings hearing, with at least three of the prevailing members voting. Only those Commissioners on the prevailing side of the Commission's action are eligible to vote on the revised findings. The Commissioners eligible to vote are:

Commissioners Bochco, Cox, Groom, Howell, Kinsey, Luevano, McClure, Mitchell, Turnbull-Sanders, Uranga, and Vargas

Resolution:

The Commission hereby adopts the findings set forth below for Coastal Development Permit 6-15-0142 on the grounds that the findings support the Commission's decision on January 14, 2015, and accurately reflect the reasons for it.

Motion:

I move that the Commission ~~approve~~ Coastal Development Permit Application No. 6-15-0142 subject to the conditions set forth in the staff recommendation.

~~Staff recommends a YES vote on the foregoing motion. Passage of this motion will result in conditional approval of the permit and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.~~

Resolution:

~~*The Commission hereby approves coastal development permit 6-15-0142 and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation*~~

~~measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.~~

II. STANDARD CONDITIONS

This permit is granted subject to the following standard conditions:

1. **Notice of Receipt and Acknowledgment.** The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. **Interpretation.** Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.
4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS

This permit is granted subject to the following special conditions:

1. **Revised Final Plans. PRIOR TO THE ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT,** the applicant shall submit for review and written approval by the Executive Director, final plans for the proposed development. Said plans shall be stamped approved by the City of San Diego and be in substantial conformance with the plans submitted by the applicant, date stamped as received on February 4, 2015, except they shall be revised to reflect the following:

- a. ~~The proposed church shall be lowered in height such that the portions of the roof originally proposed at 50 feet above finished grade are no higher than 40 feet above finished grade, and the highest point of the dome feature originally proposed at 85 feet above finished grade is no higher than 50 feet above finished grade, as generally depicted in Exhibit 9.~~

- ~~b. The four buildings shall be reconfigured such that they are sited in order from shortest to tallest from north to south, in particular, that the church building is located at the southernmost portion of the site with maximum possible visual screening by the neighboring church development, as generally depicted in Exhibit 15.~~
- a. Bicycle racks and covered trash and recycling receptacles shall be installed in easily accessible locations on the subject site.

The permittee shall undertake development in accordance with the approved final plans. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without a Coastal Commission-approved amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

2. Final Landscape Plans. PRIOR TO THE ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, the applicant shall submit for review and written approval by the Executive Director, final landscape plans for the proposed development. Said plans shall be stamped approved by the City of San Diego and be in substantial conformance with the plans submitted by the applicant, date stamped as received on February 4, 2015, and shall include the following:

- a. The type, size, extent, and location of all trees on the site. The trees shall maximize screening of the structure from views from San Dieguito Lagoon, Gonzalez Canyon, and El Camino Real, and shall include a continuous line of specimen-sized trees (minimum 24-inch box) for 500 linear feet from the east edge of the proposed driveway along the El Camino Real frontage adjacent to the full-width acceleration lane as depicted on Exhibit #25.
- b. Only materials that are drought tolerant and native shall be utilized in the approved plant palette for the project, but use of drought-tolerant, non-invasive, and non-native ornamental species and lawn area may be used as a small component. Landscaping in areas bordering the adjacent MHPA shall consist of native coastal sage scrub species obtained from local stock, if available. No plant species listed as problematic and/or invasive by the California Native Plant Society, the California Exotic Pest Plant Council, or as may be identified from time to time by the State of California shall be employed or allowed to naturalize or persist on the site. No plant species listed as “noxious weed” by the State of California or the U.S. Federal Government shall be utilized within the property. If using potable water for irrigation, the permanent irrigation for the project shall use water-conserving emitters (e.g. microspray) and drip irrigation. Use of weather-based irrigation controllers and reclaimed water for irrigation is encouraged.
- c. A planting schedule that indicates that the planting plan shall be implemented within 60 days of completion of construction.

- d. A written commitment by the applicant that all required plantings shall be maintained in good growing conditions, and whenever necessary, shall be replaced with new plant materials to ensure continued compliance with applicable landscape screening requirements.
- e. The use of rodenticides containing any anticoagulant compounds (including, but not limited to, Warfarin, Brodifacoum, Bromadiolone or Diphacinone) is prohibited.
- f. Five years from the date of issuance of the coastal development permit, the applicant shall submit for review and written approval of the Executive Director, a landscape monitoring report, prepared by a licensed Landscape Architect or qualified Resource Specialist, that certifies the on-site landscaping is in conformance with the landscape plan approved pursuant to this Special Condition. The monitoring report shall include photographic documentation of plant species and plant coverage.

If the landscape monitoring report indicates the landscaping is not in conformance with or has failed to meet the performance standards specified in the landscaping plan approved pursuant to this permit, the applicant, or successors in interest, shall submit a revised or supplemental landscape plan for the review and written approval of the Executive Director. The revised landscaping plan must be prepared by a licensed Landscape Architect or Resource Specialist and shall specify measures to remediate those portions of the original plan that have failed or are not in conformance with the original approved plan.

The permittee shall undertake the development in accordance with the approved final landscape plans. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without a Coastal Commission approved amendment to this coastal development permit unless the Executive Director determines that no such amendment is legally required.

3. Exterior Treatment. PRIOR TO ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, the applicant shall submit for the review and written approval of the Executive Director, a color board or other indication of the exterior materials and color scheme to be utilized in the construction of the proposed development. This document shall comply with the following requirements:

- a. The color of the proposed church shall utilize materials that blend with the natural landscape and be restricted to neutral, earth-tone, muted colors with no bright tones except as minor accents, for example, wall colors of darker, off-white tones with tan brick and a dull gray roof.

The permittee shall undertake the development in accordance with the approved colors and building materials. Any proposed changes to the approved colors and building

materials shall be reported to the Executive Director. No changes to the approved colors or building materials shall occur without a Commission approved amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

4. **MHPA Area Deed Restriction.** No development, as defined in Section 30106 of the Coastal Act, shall occur in the on-site MHPA area of approximately 9.2 acres, as generally shown in Exhibit 5, except for:

- a. Activities to restore and enhance the habitat consistent with Special Condition 6 and the restoration plan required thereunder; and future habitat restoration activities such as wetland mitigation approved by the Commission as an amendment to this permit, unless the Executive Director determines an amendment is not legally required.
- b. Maintenance of utility, sewer, water, drainage, and other easements identified as Easements A-F, H, and I, and the three Non-Plottable Easements on Sheet 2 of 16 of the project plans submitted with this application, and as generally depicted on Exhibit 5.
- c. Activities to maintain the Slope Easement, including possible rebuilding of a slope or slopes or maintenance of the Coastal Sage Scrub habitat, in the 1.6-acre area as recorded by Instrument No. 88-158332, "Exhibit A, Slope Easement" on April 7, 1988, granted to the City of San Diego and as generally depicted on Exhibit 5.

PRIOR TO ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, the applicant shall execute and record a deed restriction, in a form and content acceptable to the Executive Director, imposing the restrictions included in this condition as covenants, conditions, and restrictions on the use and enjoyment of the MHPA area as generally depicted in Exhibit 5. The recorded document shall include a legal description and graphic depiction of the legal parcel(s) subject to the CDP and a metes and bounds legal description and graphic depiction of the MHPA area prepared by a licensed surveyor based on an on-site inspection, drawn to scale, and approved by the Executive Director. The recorded document shall also reflect that development in the MHPA area is restricted as set forth in this permit condition.

The deed restriction shall be recorded free of prior liens and encumbrances which the Executive Director determines may affect the interest being conveyed. The deed restriction shall run with the land in perpetuity, binding all successors and assignees. This deed restriction shall not be removed or changed without a Commission-issued amendment to coastal development permit 6-15-0142.

5. **Future Development.** This permit is only for the development described in Coastal Development Permit #6-15-0142. Except as provided in Public Resources Code Section 30610 and applicable regulations, any future development as defined in PRC Section 30106, including, but not limited to, change in the density or intensity of use land

(such as the addition of a daycare, preschool, after-school childcare or school program); future improvements related to wildlife movement in Gonzales Canyon, such as fencing; future public trail improvements; or future use of the site as a wetlands restoration project, shall require an amendment to Coastal Development Permit #6-15-0142 from the California Coastal Commission or shall require an additional coastal development permit from the California Coastal Commission, unless the Executive Director determines no permit is legally required.

6. Final Restoration and Monitoring Plan. PRIOR TO ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and written approval a stand-alone final restoration and monitoring plan that shall be prepared based on the Conceptual Restoration Plan in the Biological Resources Technical Report by Dudek dated January 2014 submitted with this application. The plan shall include, at a minimum:

- a. A detailed site plan of the restoration area including a location map, proposed project site plan, map of existing biological resources, wetlands delineation, and description and map comparing existing vs. future site conditions.
- b. A clear statement of the goals of the restoration plan, including the desired habitat types, major vegetation components, hydrological regime for wetlands, and wildlife support functions. Each habitat type being restored shall be treated separately in the plan.
- c. A grading plan and methods to control erosion and maintain water quality.
- d. A final planting palette that does not include *Baccharis pilularis* or *Isocoma menziesii*. Only species native to southern California shall be used. No plant species listed as problematic or invasive by the California Native Plant Society (<http://www.CNPS.org/>), the California Invasive Plant Council (<http://www.cal-ipc.org/>), or as may be identified from time to time by the State of California shall be employed or allowed to naturalize or persist on the site. No plant species listed as a 'noxious weed' by the State of California or the U.S. Federal Government shall be utilized within the property. Seeds or cuttings used for planting materials shall come from within 10 miles of the coast of Los Angeles, Orange, or San Diego Counties.
- e. A planting plan that includes the technical details of planting methods (e.g. spacing, mycorrhizal inoculation, etc.) and a planting schedule that indicates that the restoration activities shall be implemented within 60 days of completion of construction of the development approved by this permit.
- f. Specific ecological performance criteria that include standards for species diversity and vegetative cover, with an explanation of the basis for the selection of the performance criteria, the procedure for judging success, a sampling design, and a determination of how many replicate samples will be required to determine whether success was achieved. Success criteria shall insure that the major

structure-producing species that characterize the habitat are present as appropriate to the specific habitat type being restored, and that there is an appropriate diversity of species in both the shrub and herbaceous vegetation layers. In five years, the non-native cover on the restoration site shall be no more than 10%.

- g. A maintenance plan for the restoration area that shall describe the weed eradication methods and the herbicide, pesticide and fertilizer practices as well as list the chemical pesticides and fertilizers that will be used on site, including the expected frequency and volume of each application. All recommendations will be provided by a licensed pest control advisor (PCA) and applied under the supervision of a pest control applicator. The selected chemicals shall not be toxic to fish or wildlife or shall not persist in the environment. All herbicides and pesticides used shall be applied by hand application or by other means that will prevent leakage, percolation, or aerial drift into adjacent lagoon, wetland and upland areas. Weeding should occur frequently until the native vegetation is sufficiently well-established, and should be done by hand and must be supervised by the project ecologist to insure that native plants are not disturbed. If supplemental watering is planned, the method and timing of watering should be described and shall avoid erosion impacts. All irrigation infrastructure must be removed by the end of the monitoring period.

UPON COMPLETION OF CONSTRUCTION:

- h. Monitoring reports shall be produced annually for a five year period. A final monitoring report shall be submitted to the Executive Director at the end of the 5-year monitoring period and will evaluate whether the restoration site conforms to the performance standards. Final performance monitoring shall take place after at least three years without remediation or maintenance other than weeding or after 5 years, whichever is longer. If the final report indicates that the restoration project has been unsuccessful, in part, or in whole, based on the approved performance standards, within 90 days a revised or supplemental restoration program will be submitted designed to compensate for those portions of the original program which did not meet the approved performance standards. The revised restoration program will be processed as an amendment to the coastal development permit, unless the Executive Director of the Coastal Commission finds that an amendment is not necessary.

The permittee shall undertake the development in accordance with the approved plan. Any proposed changes to the approved plan shall be reported to the Executive Director. No changes to the plans shall occur without a Coastal Commission approved amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

7. Final Drainage Plan. PRIOR TO ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and written approval a stand-alone, post-development runoff plan (PDRP) that shall be prepared based on the Water Quality Technical Report (WQTR) by Leppert

Engineering Corporation dated July 15, 2013 submitted with this application. The plan shall include:

- a. Project designs that incorporate Low Impact Development to retain on-site (by means of infiltration, evapotranspiration, retention, or harvesting) of the volume of the 85th percentile design storm volume where appropriate and feasible. The PDRP would identify any LID techniques that could be effective for any facet of the project. The PDRP shall include a detailed characterization of the substrate on the mesa where the development is to occur, and would also evaluate whether or not the use of soil amendments could be used to improve the infiltration properties of the existing substrate.
- b. A plan for handling existing run-on from the adjacent developed site and parking lot (APN 299-040-33).
- c. A map showing the location of all storm drain infrastructure and structural BMPs to be used (a separate map from the construction BMP locations).
- d. Locations where it is feasible to direct roof run-off to landscaped areas for dispersal.
- e. Landscaped areas that will act to break up runoff from impervious surfaces.
- f. A table of calculations of the individual areas of landscaping, roof, parking lots, and other paved surfaces, runoff coefficients for each category, and runoff volumes from each area.

The permittee shall undertake development in accordance with the approved final drainage plan. Any proposed changes to the approved final drainage plan shall be reported to the Executive Director. No changes to the approved final drainage plan shall occur without a Coastal Commission-approved amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

8. Construction Best Management Practices Plan. PRIOR TO ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and written approval a construction pollution prevention plan that includes:

- a. A construction site plan map.
- b. A description of BMPs to be implemented to minimize runoff and pollutant discharge, as well as BMPs to minimize soil erosion and sedimentation including erosion control BMPs, sediment control BMPs, and tracking control BMPs.
- c. A description of BMPs to be implemented to minimize discharge of other pollutants from construction activities, including chemical and material

storage BMPs and site management “good housekeeping” BMPs.

- d. A description of BMPs to be implemented to infiltrate or treat runoff.
- e. A plan to stabilize soil as soon as feasible.
- f. A plan to minimize land disturbance and soil compaction.
- g. A description of how damage or removal of vegetation will be minimized.
- h. Avoidance of plastic netting in temporary erosion and sediment control products.
- i. A designated fueling and maintenance area.
- j. A schedule of BMP installation and construction phasing.

The permittee shall undertake development in accordance with the approved plan. Any proposed changes to the approved plan shall be reported to the Executive Director. No changes to the approved plan shall occur without a Coastal Commission-approved amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

9. **Deed Restriction. PRIOR TO ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT**, the applicant shall submit to the Executive Director for review and approval documentation demonstrating that the applicant has executed and recorded against the parcel(s) governed by this permit a deed restriction, in a form and content acceptable to the Executive Director: (1) indicating that, pursuant to this permit, the California Coastal Commission has authorized development on the subject property, subject to terms and conditions that restrict the use and enjoyment of that property; and (2) imposing the Special Conditions of this permit as covenants, conditions and restrictions on the use and enjoyment of the Property. The deed restriction shall include a legal description of the entire parcel or parcels governed by this permit. The deed restriction shall also indicate that, in the event of an extinguishment or termination of the deed restriction for any reason, the terms and conditions of this permit shall continue to restrict the use and enjoyment of the subject property so long as either this permit or the development it authorizes, or any part, modification, or amendment thereof, remains in existence on or with respect to the subject property.

IV. FINDINGS AND DECLARATIONS

A. PROJECT DESCRIPTION

The proposed development is construction of a church complex consisting of a 8,740 sq. ft., 85-ft. tall church topped by an 8-ft. high cross; a 17,185 sq. ft., 40-ft. tall multi-

purpose hall; a 13,150 sq. ft., 28.3-ft. tall youth/recreation center; and a 10,460 sq. ft., 28.5-ft. tall cultural/education building on an existing vacant parcel formally used for agriculture. Development of the site will include 88,456 sq. ft. of paved area including a 176-space parking lot, a new entry driveway, construction of a new right hand turn land and a 960-ft. long acceleration lane on northbound El Camino Real; 58,195 sq. ft. of landscaping; 5,200 cu.yds. balanced grading; and 1.95 acres of wetland/transitional upland habitat restoration to compensate for impacts associated with the project. The proposed development is intended to serve the Armenian congregation in San Diego County.

The subject site is an irregularly—shaped 13.4-acre parcel that borders the inland side of El Camino Real between San Dieguito Road and Sea Country Lane, east of Interstate 5, in the San Dieguito Valley area of the City of San Diego (Exhibits 1 and 2). The flat mesa top portion of the site where development is proposed has been graded previously and used for agriculture in the past. There is currently no vegetation on the 4.27-acre portion of the site proposed for development, with the exception of 0.03 acres of coastal sage scrub where the entry driveway is proposed. The remaining 9.13 acres on the northern portion of the site are located within the City's Multi-Habitat Planning Area (MHPA). The only development proposed within this area is wetland and transitional upland habitat restoration.

The City's approval of this project included a Planned Development Permit (PDP), required to approve deviations from the Land Development Code; a Conditional Use Permit (CUP), required to approve a place of religious assembly as the use for this site under the existing zoning, which is AR-1-1; a Site Development Permit (SDP), required to approve development on a site containing environmentally sensitive lands; and a Multi-Habitat Planning Area Boundary Line Adjustment (MHPA BLA) to remove 0.88 acres of non-habitat area from the MHPA reserve. These will all be discussed in more detail in the following sections.

The project site is located in the North City Future Urbanizing Area (NCFUA), which is an area of deferred certification in the City of San Diego's LCP. The NCFUA is divided into five subareas. The Commission certified a Framework Plan for the NCFUA in 1993. This document established general conceptual circulation patterns and open space areas, but was intended to be implemented through specific plans for each of the subareas prior to the Commission transferring permit authority to the City for those portions of the NCFUA in the coastal zone. Subareas I and IV are located entirely outside the coastal zone, and the Commission has certified specific plans for the coastal zone portions of Subareas III and V. The subject site is located within Subarea II. Since the vast majority of Subarea II is comprised of area currently being planned for the San Dieguito wetlands restoration project, it is unlikely that a specific plan will ever be prepared for this subarea. Thus, the Commission continues to use the certified Framework Plan as guidance for the area. The City's Land Development Code (LDC) constitutes the certified IP for the entire City, and is also used as guidance here.

There is also a certified Land Use Plan (LUP) for the area, the North City Local Coastal Program LUP, which the Commission uses for guidance. However, this document does

not contain any policies with respect to this area, because the Framework Plan and subsequent subarea plans were intended to govern development in the NCFUA. Therefore, the Coastal Commission retains coastal development permit authority over Subarea II at this time and the Chapter 3 policies of the Coastal Act are the standard of review.

B. VISUAL RESOURCES

Section 30251 of the Coastal Act is applicable and states:

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

The proposed development includes a maximum 93-foot tall church, a 40-foot tall multi-purpose hall, a 28-foot tall youth/recreation center, and a 28.5-foot tall cultural and educational building. The tallest building, the church, would have a tiered roofline with several levels. The bulk of the church building would be 50 feet tall, with a small portion of the building having a lower roof level of 30 feet, a porch/entryway area with a steeple reaching 54 feet tall, a 35-foot tall dome on top of the main 50-foot roof level reaching to a total of 85 feet above grade, and an 8-foot tall cross on top of the dome for a maximum proposed height of 93 feet above grade (Exhibit 8).

The subject site is zoned AR-1-1, where the City's municipal code and certified IP requires a maximum 30-foot height limit. However, for this zone, the code allows a structure to exceed the 30-foot height limit if the front, side, and rear setbacks are each increased by 10 feet for each 10 feet, or portion thereof, of structure height above 30 feet, except as limited by overlay zone requirements (the subject site is east of Interstate 5, thus the 30-foot height limit required by the Coastal Height Limit Overlay Zone applied to most of the City of San Diego does not apply here). As proposed, the church would have a front yard setback of 170 where 25 feet is required; a rear yard setback of 490 feet where 25 feet is required; and a minimum side yard setback of 88 feet where 20 feet is required. Thus, as the setbacks for the church are proposed to be at least 68 feet greater than the required setbacks, the 30-foot height limit is allowed to be increased by 68 feet for a total of 98 feet. Thus, the proposed maximum height of 93 feet for the church is allowed by the zoning code (Exhibit 14). Similarly, as proposed, the multi-purpose hall will have a front yard setback of 325 feet where 25 feet is required; a rear yard setback of 290 feet where 25 feet is required; and a minimum side yard setback of 34 feet where 20 feet is required. Thus, as the setbacks of the multi-purpose hall are proposed to be at least 14 feet greater than the required setbacks, the 30-foot height limit is allowed to be increased by 14 feet for a total of 44 feet. Therefore, the proposed maximum height of 40

feet for the multi-purpose hall is also allowed under the City's zoning code (Exhibit 13 and 14).

The City approved three setback deviations through a Planned Development Permit for the proposed cultural and education building and youth center building, which are both proposed to be under the 30-foot height limit. Specifically, as approved by the City, the cultural and education building will have a side yard setback of 13 feet where 20 feet is required, and the youth center building will have a side yard setback of 5 feet where 20 feet is required and a rear yard setback of 5 feet where 25 feet is required (Exhibit 14). The City found that these deviations were approvable for the following reasons: the minimum setbacks in the AR-1-1 zone are most relevant to development of low density residential uses but less relevant when siting a series of structures comprising of a church complex that preserves sensitive habitat elsewhere on the site; the proposed development is located in the least environmentally sensitive portion of the site; the allowable developable area of the site makes it difficult to achieve minimum yard setbacks; and the deviations will not create physical environmental impacts or potential land use conflicts.

However, while the proposed buildings heights are permitted by the underlying zone, the development would be significantly taller than any of the surrounding developments, and the height, bulk, and scale of the proposed structures raise serious concerns regarding community character and the contrast with the surrounding natural setting. The subject site is surrounded primarily by open space area, including Gonzales Canyon to the east and the San Dieguito Lagoon River Valley and restoration area to the north and west on the seaward side of El Camino Real. These open space areas are publically owned or managed by the City of San Diego or by the San Dieguito River Valley Joint Powers Authority (JPA). The Gonzales Canyon area adjacent to the subject site is City-dedicated open space in association with development of a portion of the property for residential use, and provides a habitat linkage between the San Dieguito and Los Peñasquitos open space systems. The river valley contains the San Dieguito Lagoon, River, and wetlands area, where the San Dieguito Wetlands Restoration Project is located. This restoration project is mitigation for impacts caused by the San Onofre Nuclear Generating Stations (SONGS), and was developed by Southern California Edison, the principal owner of SONGS, in coordination with the JPA and approved by the Commission in 2005 (ref. CDP #6-04-088). The restoration area covers approximately 165 acres and supports diverse and sensitive wetland habitat and wildlife. The restoration project includes a public access component managed by the JPA, providing for segments of the Coast to Crest trail, interpretive signage, a visitor center, trailhead parking, and viewpoints. The Coast to Crest trail is currently accessible to the public from several locations in the project vicinity including the Del Mar Fairgrounds and the site of the future visitor center, and upon completion is intended to stretch continuously from the coast 55 miles east to Julian. Other trails in the river valley area include the Crest Canyon Trail and the Dust Devil Nature Trail. These public access and recreation areas are commonly used for walking, biking, horseback riding, nature viewing, and exercising. The site of the future visitor center currently contains an outdoor amphitheater (approved by CDP #6-98-154-A3) used as a component of the educational opportunities provided by the JPA for the public to access the coastal resources available within the adjacent lagoon system, and the future visitor center itself will include a ranger station (approved by CDP #6-15-0580),

public restrooms, public parking, and a nature interpretive center for the public. Thus, the publically-owned open space systems surrounding the subject site are set aside for habitat and public access and recreational uses, and provide a natural, scenic landscape that should be protected as such.

All of the parcels on the east side of El Camino Real, including the subject site, are highly visible from Interstate 5, El Camino Real, and the public access and recreation areas in the San Dieguito River Valley described above, including the Coast to Crest Trail. Thus, the Commission has carefully considered the visual impact of each of the existing developments. The subject site itself is adjacent to, and partially behind (east of), the site of the existing ~~Formosan~~ Harvest Evangelical Church of San Diego, approved by the Commission in 2004 with CDP #6-04-071. This development includes a 43-foot tall church building, with the bulk of the building at a maximum of 30 feet tall and an open frame design for the steeple/tower feature above 33 feet. The Stallion's Crossing residential development is just to the southeast, separated from the rear property line of the subject site by a vacant privately-owned parcel. This development was approved by the Commission in 2001 with CDP #6-01-037, with 47 residential buildings at a maximum height of 30 feet. Across the City-dedicated open space on the eastern side of the subject site is a Pardee residential development, approved by the Commission in 2008 with CDP #6-08-056, with ten residential buildings at a maximum height of 32.5 feet.

The remaining developable, privately owned parcels on the eastern side of El Camino Real in this area include the parcel immediately south of the subject site, currently owned by Harmony Group Properties, LLC and anticipated for residential development, and the parcel adjacent to the northeastern-most portion of the subject site at the intersection of El Camino Real and San Dieguito Road, currently owned by the Water Lutheran Church. ~~With~~ Although the majority of the existing surrounding development is maintained under 33 feet in height, the Commission must consider in this particular circumstance, that construction of the proposed 85-foot tall church would not set an adverse precedent for the vacant lots in the area that have yet to be developed, ~~potentially~~ and would not ~~resulting~~ in significant individual and cumulative impacts to the scenic quality of the area; as other parcels may have sufficient setbacks for minor increases in building heights, but not for significantly increased building heights similar to the proposed complex.

Portions of the proposed development will be screened by the ~~Formosan~~ Harvest Evangelical Church of San Diego building; however, the proposed 85-foot tall church is proposed to be sited at the northernmost portion of the building pad where it will not be screened by the ~~Formosan~~ Harvest Evangelical Church of San Diego and would be highly visible from the adjacent road and open space areas. The proposed development would extend a maximum of 50 feet above the adjacent church (Exhibit 11), towering over the surrounding development and the scenic, undeveloped open space area. ~~Relative to the surrounding developments and particularly~~ Though the project site is to the adjacent to the undeveloped river valley and Gonzales Canyon, in this particular case, the proposed development would not dominate the viewshed nor contrast with its largely natural setting and character; as the ridgeline is already well populated and the proposed project is compatible with the existing, surrounding development. Consistent with the existing

pattern of development, the proposed development will be located on the inland side of El Camino Real, in close proximity to other existing development. The subject site is 2 miles inland from the shoreline as the crow flies, and there are no public views across the site towards the lagoon or the ocean.

The Final Environmental Impact Report (FEIR) prepared for the proposed development considers the visual impacts of the project, and confirms that the project would be highly visible from the adjacent canyon and river valley areas and would visually contrast with the surrounding development. The FEIR concludes that the proposed visual impacts are significant and unavoidable, and considers two project alternatives that would avoid or substantially lessen these impacts. The first alternative, the “No Project/No Build Alternative,” would mean the project would not proceed and the site would remain undeveloped. Analysis of this alternative concludes that the identified impacts would be avoided, but that the project objectives of building a place of worship would not be met and thus is not a feasible alternative. The second alternative, the “Reduced Height Alternative,” considers the project as proposed but with a 45-foot tall church building, essentially by removing the dome and cross feature and lowering the proposed 50-foot roof height to 45 feet (Exhibit 18). Analysis of this alternative concludes that the identified visual impacts would be substantially lessened as the reduced height project would not contrast with the surrounding area and developments, and that this alternative would meet most project goals. However, this alternative is also dismissed as it would remove the dome and cross from the project design and thus, the project proponents argue would not provide a meaningful place of worship consistent with traditional Armenian architecture, which places a strong emphasis on verticality. The FEIR states that off-site alternative locations and reduced development alternatives were briefly considered as part of the alternatives process, but were also considered infeasible to meet the project goals and were not analyzed further. No alternatives addressing a reduced height but while still including a dome and cross, or reconfiguring the site plan to provide some screening of the proposed church behind the Formosan Harvest Evangelical Church of San Diego, or a design alternatives to reduce overall bulk and height using open frame designs or incorporation of basements were considered or analyzed in the FEIR.

Commission staff submitted comments on April 14, 2014 on the draft EIR, identifying several Coastal Act consistency concerns with the proposed development including impacts to existing viewsheds and community character (Exhibit 16). In this letter, Commission staff indicated that buildings of the proposed size cannot be considered in character with the surrounding community, as the majority of the adjacent land uses consist of undeveloped open space or farmland, and requested that the EIR include an evaluation of how the design for the project could be developed of the same scale and character of the surrounding community. The City responded to this in the FEIR by noting that the proposed project would have a floor area ratio (FAR) of 0.09, which is less than that of the Formosan Harvest Evangelical Church of San Diego development at a FAR of 0.15 and the Stallion’s Crossing residential development at a FAR of 0.47. However, this assessment is misleading; the subject site only has 3.35 acres of allowable developable area out of the total 13.4 acres, but is proposing development on 4.23 acres with the proposed building footprints covering approximately 0.9 acres of that area, which yields a FAR of 0.21 (site development constraints and encroachments described

in more detail in Section C. Biological Resources). Commission staff also indicated in the comment letter that the size and height of the proposed structures would result in impacts to existing public views of the river valley and scenic viewshed, and that in order to be found consistent with Section 30251 of the Coastal Act, all significant coastal views must be protected. Staff noted that the draft EIR failed to include an alternative that would eliminate all significant view obstructions, and that in order to be consistent with the Coastal Act, the EIR must first eliminate an alternative that would protect all significant public views. The FEIR does this with the “No Project” alternative as described above. However, staff noted at the time that if absolute elimination of all significant view impacts is not feasible (as the FEIR concludes), the identified 45-foot “Reduced Height” alternative would be considered more consistent with Section 30251 and should be the selected building design alternative.

The FEIR confirms that the vertical form, bulk, and tall scale of the proposed church and associated buildings will alter the views of the project site and vicinity, with the height of the proposed dome and cross reaching to 50 feet above the ~~Formosan~~ Harvest Evangelical Church of San Diego and more than 70 feet above the one- and two-story residential and equestrian development in the surrounding area, and concludes that these impacts are entirely attributed to the dome and cross feature but are significant and unavoidable. Although the FEIR concludes that the reduced height alternative is the least impactful option that would meet most project goals and reduce visual impacts, this alternative was not considered feasible as that design would not meet the stated goals of the applicant.

As the FEIR concludes that the proposed visual impacts are significant and unavoidable and the analyzed alternatives are infeasible, the City adopted overriding considerations based on the economic, social, and other benefits of the proposed project. Specifically, the City found that the proposed development will promote cultural and religious awareness, will provide a public gathering space, will restore native habitat within Gonzales Canyon, and will provide jobs for area residents, which in the City’s view outweighed the significant visual impacts.

~~However, the Commission respectfully disagrees that there are no feasible alternatives that would meet the project goals. The Commission notes that Aa revised design and location for the tallest building—the church—could be achieved while still maintaining a strong emphasis on verticality. Specifically, by reducing the overall height of the church and reconfiguring the four buildings such that they are sited in order from shortest to tallest from north to south, the church building would be more compatible with the existing heights of development and would be partially screened by the Formosan~~ Harvest Evangelical Church of San Diego development to reduce visual impacts on the scenic viewshed.

Reducing the height of the church while maintaining relative verticality could be achieved by ~~lowering~~ the portions of the roof originally proposed at 50 feet above finished grade to no higher than 40 feet above finished grade, and lowering the dome feature such that the highest point originally proposed at 85 feet above finished grade is no higher than 50 feet above finished grade. With these modifications, the bulk of the

church building would be below 40 feet in height with a maximum height of 58 feet from the dome and cross feature. Similar to the “Reduced Height Alternative” analyzed in the FEIR, these modifications would reduce the significant visual impacts of the proposed project and improve its compatibility with the surrounding area and developments, would better achieve all project goals as the dome and cross feature would be retained but at a reduced height, and the verticality of traditional Armenian architecture would be still be achieved with the tiered roof level design at a reduced height. Reducing the height of the proposed church as such would not eliminate any of its functionality, as its proposed height is a result of vaulted ceilings and architectural features rather than usable floors.

However, in this particular instance, the visual impacts of the proposed project will not significantly intrude in the larger panoramic of the valley as there are existing developments in close proximity and on the ridgeline. Consistent with the existing pattern of development, the proposed development will be located on the inland side of El Camino Real, in close proximity to adjacent development. The project will be highly visible from Interstate 5, but the subject site is 2 miles inland from the shoreline, and there are no public views across the site towards the lagoon or the ocean. In addition, given that the existing ridgeline is well populated and the local zoning code allows for the proposed building heights with additional setbacks, the church complex, as proposed, does not constitute a significant adverse visual impedance in the area. Reconfiguring the site plan such that the church is located in the southernmost portion of the building pad would by no means hide the church as portions of the structure would still be taller than the adjacent church and proposed buildings, but would result in a stair-step transition such that the proposed buildings decrease in height as they approach the open space system to the north and thus would be increasingly subordinate to the natural setting. All other uses would remain exactly as proposed, with the only changes being the height of the church building and the arrangement of the four buildings.

A visual impacts analysis using simulations was submitted as part of the FEIR, and includes simulations of the proposed project and the 45-foot “Reduced Height Alternative” (Exhibit 18). Although many of the viewpoints are taken from a great distance away from the subject site, it is evident that the proposed development is clearly visible from many scenic, public vantages and that the reduced height alternative would cause a substantially lessened visual impact that would be more subordinate to the natural setting and more compatible with the surrounding development. However, Aallowing an 85-foot high building in this location would not set an adverse precedent for the development of extremely high buildings in the adjacent vacant lots, and could even would not spur additional tall development on the existing lots, as there is minimal vertical-development potential on other lots due to size constraints. each project proponent attempts to stand out in this visually prominent location.

Therefore, **Special Condition #1** requires submittal of revised final plans consistent with the preliminary plans submitted and that reflect bicycle racks and covered trash and recycling receptacles installed in easily accessible locations on the subject site. ~~that lowers the proposed church building in height such that the portions of the roof originally proposed at 50 feet above finished grade are no higher than 40 feet above finished grade, and the highest point of the dome feature originally proposed at 85 feet above finished~~

grade is no higher than 50 feet above finished grade. Thus, with the 8-foot tall cross, the overall maximum height of the church will be 58 feet with the bulk of the building at 40 feet, consistent with the maximum height of the proposed multi-purpose room and compatible with the adjacent church and residential developments. In addition, this condition requires reconfiguration of the proposed buildings such that they are sited in order from shortest to tallest from north to south, such that the church building is located at the southernmost portion of the site where it is visually screened by the neighboring church development (Exhibit 15). With this condition, the development will include the features and functions similar to the proposed project, while significantly reducing the visual impacts on the character of the setting. The applicant has submitted draft elevation plans depicting the church building at the reduced heights per Special Condition #1 (Exhibit 9), but has indicated they do not feel that it is consistent with traditional Armenian architecture. However, as described in detail above, the proposed development would not be consistent with the Coastal Act without these modifications to reduce visual impacts, improve compatibility with the surrounding open space and developments, and avoid setting an adverse precedent.

These modifications to the proposed project may require various deviations from the City's municipal code. The City has indicated that the site reconfiguration would likely require setback deviations for the church and multi-purpose building, as were required for the proposed site plan, due to the constraints of the developable area of the site. The City indicated that these setback deviations could either be found in substantial compliance with the approved setback deviations or would require an amendment to the local approvals. The City has also indicated that due to site constraints and the reconfiguration of the proposed buildings, siting the church at the southernmost portion of the site may require height deviations, even with the reduce height as stipulated in Special Condition #1, since there may not be sufficient space for increased setbacks to allow the proportional increase in building height over 30 feet as permitted by the site's zoning. The City has indicated that they cannot confirm support of these revisions to their local approvals at this time without further review, and that there was public concern from the Stallion's Crossing development with the bulk and height of the proposed development along the southern property line, but that there is nothing in the code that prevents or prohibits the applicant from requesting these revisions and deviations for the project. As with the case for the approved deviations for the proposed project, the deviations required for this project redesign would not create physical environmental impacts or potential land use conflicts. The City has approved such height deviations in the past, such as for the adjacent Formosan Church. Furthermore, this project alternative would reduce overall visual impact on the surrounding landscape, and thus should also qualify for receiving these minor deviations.

In addition, **Special Condition #2** requires submittal of final landscape plans including trees that will maximize screening of the proposed development from views from San Dieguito Lagoon, Gonzales Canyon, and El Camino Real. The proposed landscape plan (Exhibit 7) includes a variety of trees that will reach approximately 15-60 feet tall at maturity along the front and rear facades of the development and in the parking lot. This condition will ensure maximal screening by requiring a line of trees along the El Camino Real frontage next to the proposed acceleration lane, which will soften views of the most

visually prominent portion of the site. **Special Condition #3** requires the proposed development to be earth-toned to blend with the natural landscape, to further reduce visual impacts. The ~~Fornosan~~ Harvest Evangelical Church of San Diego is a good example of this, as its earth-toned exterior treatment and landscaping features make it difficult to see from the same vantage points that the proposed development will be highly visible from. **Special Condition #9** requires the applicant to record a deed restriction imposing the conditions of this permit as covenants, conditions and restrictions on the use and enjoyment of the property.

As revised to reduce the overall height of the proposed church building, reconfigure the proposed buildings such that they are sited in order from shortest to tallest from north to south, maximize landscape screening, and impose coloring restrictions, the development will not adversely impact the visual quality of the surrounding area. Therefore, with these special conditions, the proposed development can be found consistent with Section 30251 of the Coastal Act.

C. BIOLOGICAL RESOURCES

Section 30240 of the Coastal Act is applicable and states:

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Section 30253 of the Coastal Act states, in applicable part:

New development shall:

(1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard...

The development is proposed on the flat, mesa-top portion of the site that has been used most recently for agricultural purposes. This area has been plowed and disturbed, and contains no native vegetation communities. There is native vegetation on the northern portion of the site, beyond the area used for agriculture, consisting of coastal sage scrub (CSS), Diegan CSS, southern willow scrub, tamarisk scrub, and mulefat scrub (Exhibit 20). The northeastern most portion of the site also contains jurisdictional wetlands and a wildlife corridor that passes through Gonzales Canyon and connects to the adjacent San Dieguito River. The only development proposed on this portion of the site is 1.95 acres of habitat and wetland restoration, and a portion of the proposed road to access the church complex that will impact 0.03 acres of CSS. Approximately half of the site is located in

the 100-year floodplain, but the proposed development is concentrated on the mesa-top portion of the site that is at a higher elevation and outside of the floodplain.

The majority of the site is mapped as part of the City's Multi-Habitat Planning Area (MHPA), which was created by the City as part of the regional Multiple Species Conservation Program (MSCP) mapping efforts in 1997, subsequent to the California Natural Communities Conservation Planning Act of 1992. The MSCP is a long-term regional conservation plan established to protect sensitive species and habitats in San Diego County, and the MHPA delineates core biological resource areas and corridors targeted for conservation.

When the majority of a site with land use and zoning that allows for development is mapped as MHPA, the City allows 25% of the site to be used for development, which yields 3.35 acres of this 13.4-acre site. In this case, approximately 11.06 acres of the site are within the MHPA with the remaining 2.35 acres outside of the MHPA, so development would be allowed to encroach exactly one acre into the MHPA. However, the applicant has proposed to develop on approximately 4.23 acres of the site, encroaching 0.88 acres or 6.5% beyond the allowed 25% developable area (Exhibit 21). As this 0.88-acre area consists of disturbed agriculture land with no native vegetation communities except for 0.01 acres of CSS, the City approved a boundary line correction (BLC) to remove this 0.88-acre area from the MHPA in preparation for the subject proposal, finding that the minor impacts to CSS that will occur within the area required for access to the site and are not considered significant (described in greater detail below). The City typically approves such BLCs that do not remove any habitat or wetland from the MHPA or cause subsequent impacts to MHPA buffer areas without requiring replacement of the lost MHPA area, as there is no overall loss in biological value. Thus, the applicant is not proposing to replace the loss of 0.88 acres of MHPA. The project does include the restoration of 1.95 acres of wetland and upland transitional habitat on site to compensate for the MHPA BLC and impacts to CSS (Exhibit 22). Specifically, proposed is creation of 0.41 acres of wetland habitat, restoration of 1.35 acres of transitional upland and upland buffer habitat, and enhancement of 0.19 acres of unvegetated swale.

However, neither the MSCP nor the MHPA are specifically incorporated into the City's LCP, and this project is located in an area of deferred certification where the resource protection policies in Chapter 3 of the Coastal Act are the standard of review. As the neighboring property to the west of the subject site, the ~~Formosan~~ Harvest Evangelical Church of San Diego, would not allow the proposed church to be accessed through their site, a separate road off El Camino Real is necessary to access the site. This new driveway will cause impacts to 0.03 acres of CCS (Exhibit 21). The applicant has indicated that they worked closely with the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife to minimize the proposed impacts to CSS resulting from the proposed access road to the extent feasible, and that the proposed impacts are unavoidable. While impacts could be avoided by constructing access to the site through the neighboring property, the neighboring property owners did not agree to this and thus minor impacts are necessary to allow access to the site. The wildlife agencies approved the proposed access road as it is the least environmentally damaging

alignment. The wildlife agencies have also approved the project's MHPA BLC, and the proposed Restoration Plan discussed below.

The Commission's staff ecologist has reviewed the proposed project, biological report, and other pertinent information and has determined that the impacted vegetation is not ESHA as it is very small, isolated, and immediately adjacent to El Camino Real, a wide, heavily traveled road, which reduces the area's ability to support wildlife. Impacts to CSS will be caused by vegetation removal and grading of a manufactured slope adjacent to the proposed access road. This area is proposed to be revegetated with CSS species to mitigate for impacts, stabilize the slope, and be compatible with the adjacent habitat. As proposed, all graded, disturbed, or eroded areas that will not be permanently paved or covered by structures will be revegetated with native shrubs and groundcover. Such area totals approximately 0.15 acres; thus, the proposed 0.03 acres of impact to CSS will be mitigated at a 5:1 ratio. The Commission's staff ecologist also indicated that the area currently mapped as MHPA being removed from the MHPA is not part of the nearby wildlife corridor and will not cause any impacts to wildlife movement.

The applicant is proposing a Conceptual Restoration Plan to offset the proposed impacts. Restoration is proposed as compensation at a 2:1 ratio for the 0.88-acre encroachment into the MHPA and includes 0.41 acres of wetland creation and 1.35 acres of transition upland and upland buffer restoration, as well as an additional enhancement of 0.19 acres of unvegetated swale for a total restoration area of 1.95 acres. The Commission's staff ecologist has reviewed the plan and determined that the plan outlines appropriate maintenance and monitoring measures for the restoration area, but requires additional detail on ecological performance criteria and provisions for a supplemental restoration plan if necessary to ensure restoration success is achieved. Therefore, **Special Condition #6** requires submittal of a final restoration and monitoring plan that includes a final planting palette that removes two proposed species that are extremely good colonists and can outcompete other desirable species; details the basis for and methods for assessment of defined native cover and diversity success criteria; clarifies that final monitoring shall take place after at least three years; and, if determined to be unsuccessful, requires submittal within 90 days of a revised or supplemental plan to compensate for the parts of the plan that did not meet the approved success criteria. With this condition, successful implementation of an approval final restoration plan will be ensured. Thus, the proposed impacts to native vegetation are less than significant and mitigated by the proposed restoration.

The Conceptual Restoration Plan also includes discussion of a 0.08-acre wetland creation project within the MHPA area on the site to be used for mitigation of impacts to 0.04 acres of wetland from a separate development proposal located outside of the Coastal Zone in Pacific Highlands Ranch, City of San Diego. However, the submitted conceptual plan does not describe the 0.08-acre wetland creation in sufficient detail for the Commission to assess whether the restoration would be an appropriate use of the site or would have adverse impacts on existing habitat or species. When a detailed project description for the restoration proposed to occur on the subject site is available, the applicant may submit an amendment to this permit or a new coastal development permit to implement the project.

According to the submitted biological report, the only special status plant or wildlife observed on-site during the biological surveys was the California horned lark, which is not likely to use the disturbed mesa top area where development is proposed for breeding. However, as there is the potential for the lark and other ground nesting birds to be present on site during breeding season (i.e. March 15 – September 15), the Mitigation, Monitoring, and Reporting Program (MMRP) in the adopted FEIR requires a pre-construction survey for nesting birds to take place if construction activity is to occur during the breeding season. If any active nests are observed, the area must be flagged and avoided with a 300-foot buffer until the nesting cycle is complete, consistent with the resource protection policies of the Coastal Act. The MMRP also requires barrier fencing along the MHPA boundary to protect the adjacent vegetation and wildlife, requires construction noise reduction measures to be implemented as necessary, and prohibits lighting from being directed at the adjacent MHPA, as consistent with the City's MHPA Adjacency Guidelines. In addition, the City and Fire Department approved a modified brush management plan for the proposed development such that only Zone 1 (irrigated drought-tolerant landscaping) will be maintained on the disturbed mesa-top portion of the site to be developed with no on or off-site thinning or clearing of native vegetation, consistent with the brush management requirements of the certified LCP. Thus, no impacts to on or off-site sensitive species are anticipated to result from the project.

The City's approval of the subject project also included a condition requiring the applicant to provide payment to the City equal to the cost of 1,000 linear feet of 6-foot high black vinyl chain link fence. The funds are intended to be used for contributing to improvement in wildlife movement in Gonzales Canyon and may be used to purchase fencing, but are not required to be used for that purpose and may be used for something that has been deemed more important for the improvement of the wildlife corridor. Pursuant to the City's approval, determination of the appropriate use of the funding for the improvement of the wildlife corridor will be made by the City's MSCP staff and the wildlife agencies. However, since no determination has been made as to what type of future wildlife improvements will be made, and new fencing or other development could have visual or habitat impacts, **Special Condition #5** informs the applicant that fencing or any other improvement installed on the site would require an amendment to this permit or a new coastal development permit.

The City has required that prior to the issuance of any construction permits, the applicant must record either a conservation easement or covenant of easement, or dedicate in fee title to the City of San Diego the on-site MHPA. In order to ensure the remainder of the on-site MHPA and natural resources are preserved as proposed, **Special Condition #4** requires the applicant restricts development on the remaining undeveloped 9.2-acre MHPA area (Exhibit 5), and requires the applicant to record a deed restriction. Within the MHPA area, allowable development shall be restricted to the proposed habitat restoration activities as approved herein, any future restoration activities as approved by the Commission, maintenance of the existing utility, sewer, drainage, and other easements as shown on Exhibit 5, and maintenance activities on the City's existing 1.6-acre slope easement. **Special Condition #2** also limits the proposed landscaping palette to consist of

native CSS species where the landscaping would border the adjacent open space areas to ensure compatibility with the adjacent habitat.

Therefore, as conditioned, impacts to on or off-site resources will be avoided or sufficiently mitigated and the proposed development is found consistent with the resource protection policies of the Coastal Act.

D. WATER QUALITY

Section 30231 of the Coastal Act addresses water quality and states:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

The applicant's proposed development includes constructing parking lots, buildings and other impervious surfaces on approximately three acres of the 4.3-acre mesa-top portion of the property. The stormwater runoff from the site is expected to potentially carry sediments, nutrients, heavy metals, organic compounds, trash & debris, oxygen demanding substances, oil and grease, bacteria and viruses, and pesticides, which would have the potential to adversely impact the water quality of the adjacent wetland area. The stormwater runoff from the site would be treating by a single, manufactured stormwater treatment device located at edge of the mesa, at the edge of the development prior to outfall to the adjacent coastal wetlands. Roof runoff would be routed to landscaped areas where feasible.

A Water Quality Technical Report was prepared by Leppert Engineering Corporation for the project. This report combines information on water quality protection that is normally submitted as two separate documents—a construction water quality report and a post-development water quality report—into a single document. The Commission's water quality staff have reviewed this combined report and determined that while it provides a general overview of the water quality impacts associated with the development, it does not include sufficient low impact development methods for infiltration of storm water, such as permeable pavers, catchment systems, or bioretention systems, which are generally more reliable than the manufactured water quality treatment devices proposed at the site. The submitted plan also does not include a detailed construction best management practices plan.

Thus, **Special Condition No. 7** requires the submittal and approval of a stand-alone, final long term water quality management plan that contains an alternatives analysis that would discuss the extent to which it is feasible to use a predominately low impact development approach to retain and treat stormwater from the development. The final

plan must include detailed plans for addressing runoff from each component of the development, including any run-on of stormwater from the adjacent site. The final plan would present a clear representation of the long term water quality features to be used, adequate to protect coastal water quality. With this condition, storm water runoff will be effectively managed through implementation of low impact development mechanisms to the extent feasible, storm drain infrastructure and structural BMPs, and directing roof runoff to landscaped areas, thereby protecting coastal water quality. **Special Condition No. 8** requires the submittal and approval of a stand-alone construction water quality plan that includes all the necessary components to protect coastal water during the construction of the development.

Thus, as conditioned, the Commission may find that the proposed project conforms to the water quality protection policies of the Coastal Act.

E. NEW DEVELOPMENT/PUBLIC ACCESS & TRAFFIC/AGRICULTURAL USE

Section 30241 and 30242 deal with agricultural use, and state:

Section 30241

The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas agricultural economy, and conflicts shall be minimized between agricultural and urban land uses through all of the following:

- (a) By establishing stable boundaries separating urban and rural areas, including, where necessary, clearly defined buffer areas to minimize conflicts between agricultural and urban land uses.*
- (b) By limiting conversions of agricultural lands around the periphery of urban areas to the lands where the viability of existing agricultural use is already severely limited by conflicts with urban uses or where the conversion of the lands would complete a logical and viable neighborhood and contribute to the establishment of a stable limit to urban development.*
- (c) By permitting the conversion of agricultural land surrounded by urban uses where the conversion of the land would be consistent with Section 30250.*
- (d) By developing available lands not suited for agriculture prior to the conversion of agricultural lands.*
- (e) By assuring that public service and facility expansions and nonagricultural development do not impair agricultural viability, either through increased assessment costs or degraded air and water quality.*

(f) By assuring that all divisions of prime agricultural lands, except those conversions approved pursuant to subdivision (b), and all development adjacent to prime agricultural lands shall not diminish the productivity of such prime agricultural lands.

Section 30242

All other lands suitable for agricultural use shall not be converted to nonagricultural uses unless (1) continued or renewed agricultural use is not feasible, or (2) such conversion would preserve prime agricultural land or concentrate development consistent with Section 30250. Any such permitted conversion shall be compatible with continued agricultural use on surrounding lands.

Section 30250 and 30252 affect new development and state, in applicable part:

Section 30250

(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources...

Section 30252

The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit...

Because agriculture contributes significantly to the State's economy and unique soil and climate conditions of coastal areas create conditions that provide high productivity for agriculture, the Coastal Act addresses agriculture within the Coastal Zone. According to the analysis in the FEIR for this project, the Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) did not identify any Prime Farmlands on or immediately adjacent to the project site. The FEIR/FMMP identifies the soil on the proposed church project site as containing Farmland of Local Importance, but no Farmland of Statewide Importance or Prime Farmland.

Coastal Act Section 30113 defines prime agricultural act according to the first four factors of Government Code Section § 51201(c), as follows:

(1) All land that qualifies for rating as class I or class II in the Natural Resource Conservation Service land use capability classifications.

(2) Land which qualifies for rating 80 through 100 in the Storie Index Rating.

(3) Land which supports livestock used for the production of food and fiber and which has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture.

(4) Land planted with fruit- or nut-bearing trees, vines, bushes, or crops which have a nonbearing period of less than five years and which will normally return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than two hundred dollars (\$200) per acre.

Taking each factor in turn, the land for the project does not qualify for a class I or II rating as classified by the Natural Resource Conservation Service; the soil has a rating of less than 80 on the Storie Index, the land is not used and has not been used to support livestock, and it is not planted with fruit- or nut-bearing trees, vines, bushes, or crops; additionally, it has returned less than \$200 acre for at least three of the last five years.

Because no prime agricultural lands are present on the subject site, the applicable Chapter 3 policy is Section 30242 of the Act, which bars conversion of all other lands suitable for agricultural use when agricultural use is feasible. Feasibility is defined by Section 30108 of the Coastal Act as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.” Continued or renewed agricultural use is not feasible on the land. The FEIR indicates that recent efforts to farm this land have been unsuccessful and unproductive, including recent attempts to grow crops that demand less water, thus satisfying part (1) of Section 30242.

Section 30242 further requires that any permitted conversion be compatible with continued agricultural use on surrounding lands. The project would not interfere with farming on surrounding lands. The site is currently zoned AR-1-1 (previously A-1-10), an agricultural designation that is typically used both for agricultural operations and as a holding zone for rural and semi-rural areas that are expected to switch to higher densities in the future as regional growth patterns dictate. AR-1-1 allows churches and places of religious assembly as a use with a conditional permit. The subject site is located between highly developed and more rural areas of the City and County of San Diego and nearby the Cities of Del Mar and Solana Beach. The valley floor and side slopes of the San Dieguito River Valley are primarily undeveloped, and much of the property is in public ownership. Conceptual planning goals would retain the maximum amount possible of the river valley in open space as a public park running from the ocean to the mountains and the source of the San Dieguito River. For this reason, much of the formerly private land in the valley has been acquired by a variety of public entities, including the California Department of Fish and Game (CDFG) and the San Dieguito River Park Joint Powers Authority (JPA).

Although the conversion of this parcel to non-agricultural use would not represent a reduction in prime agricultural lands, the loss of any farmlands represents a cumulative impact on the region's agricultural productivity as a whole. However, the river valley west of El Camino Real is crossed by three major transportation corridors: Camino del Mar, I-5 and the railroad, and has been expected to transition from agricultural use to a more developed community. The certified NCFUA Framework Plan contains the following policy for the area:

SUBAREA II: SAN DIEGUITO

3.4h Outside the compact community, a variety of low-intensity uses are envisioned. Along El Camino Real and Via de la Valle, very low-density residential development as shown on the framework plan diagram. However, sites in these locations are less suitable for residential use than for public and semi-public uses that are also allowed. The developable area on the south side of Via de la Valle east of El Camino Real may be considered for other uses during subarea planning. Along El Camino Real, public and semi-public activities would ideally be uses where buildings take up a relatively small portion of the site, and where architecture can be in harmony with surrounding open space.

The Del Mar Fairgrounds occupies approximately 300 acres on the north side of the river, west of I-5. East of I-5, north of the river, there is an existing shopping center, built on filled wetlands or tidelands prior to passage of Proposition 20. Northeast of the site, just south of Via de la Valle, is the Horsepark property, an equestrian facility owned and operated by the 22nd District Agricultural Association. The site immediately adjacent to the west of the subject site contains the existing ~~Formosan~~ Harvest Evangelical Church of San Diego, and south of the site is dense residential development. The subject development would be a semi-public use on the east side of El Camino Real. In general, the area is developing consistent with the gradual growth pattern expected under the zoning designation, and in the certified planning documents for the area.

Development of the subject site as a church is similarly consistent with these designations, and is compatible with the surrounding residential and semi-public uses. As described above and in the Visual Resources findings, the existing development and development potential in the project vicinity is limited to the eastern side of El Camino Real. The eastern side is gradually developing with residential, public, and semi-public uses, consistent with the Framework Plan. The remaining developable, privately owned parcels on the eastern side of El Camino Real in this area include the parcel immediately south of the subject site, currently owned by Harmony Group Properties, LLC and anticipated for residential development, and the parcel adjacent to the northeastern-most portion of the subject site at the intersection of El Camino Real and San Dieguito Road, currently owned by the Water Lutheran Church. The western side of El Camino Real in this area, on the other hand, is publically owned by the City of San Diego and the San Dieguito River Park Joint Powers Authority, and consists of natural open space that will remain as such. Thus, concentrating the proposed development on the east side of El Camino Real and in the portion of the subject site that is previously disturbed and located

nearest to existing development is consistent with the Framework Plan and the applicable policies of the Coastal Act, including the alternative standard for allowable conversion set by Section 30241(2) that encourages concentrated development.

The FEIR for the project determined that the traffic patterns associated with the proposed church will be consistent with the roadway classifications in the certified NCFUA Framework Plan. El Camino Real is classified as a major road with an existing Level of Service (LOS) of “A.” Existing daily traffic volume is 13,307 average daily traffic (ADT) count on weekdays and 10,900 ADT on weekends with a capacity of 40,000 ADT. The development is anticipated to generate 462 average daily trips on weekdays and 528 average daily trips on Sundays, which is a minor increase within anticipated volumes able to be accommodated by the existing roadway. The Framework Plan projected a LOS “B” for this segment, which will not be reached through the subject development. In addition, the proposed development includes a 960-foot long acceleration lane and 140-foot long right hand turn lane off El Camino Real to provide safe access to and from the site and to further reduce any potential traffic impacts. Adequate parking to accommodate the development will be provided. Thus, the project will not have an adverse impact on the public’s ability to access the coast. In order to ensure that future operations of the church do not expand in such a manner that surrounding roadways and public access could be impacted, **Special Condition #5** informs the applicant that any expansions of use at the site, such as for a daycare or school, require additional review by the Commission.

The City’s approval of the subject proposal included a condition requiring the granting of a recreation easement for trail purposes on the subject property. The exact location and granting of which is to be determined at a later date in order for the trail easement to integrate with the City’s approved trail plans, and the City or other municipal or resource agency acceptable to the City will be responsible for the construction and perpetual maintenance of the trail. However, since this condition states the recreation easement is to be located outside of the area approved for development and restoration, it would thus be located within the on-site MHPA where there could be potential habitat impacts resulting from construction of a trail. Therefore, **Special Condition #5** also informs the applicant that any future trail improvements would require an amendment to this permit or a new coastal development permit.

In conclusion, the Commission finds the conversion of this property from agricultural to non-agricultural uses consistent with the cited provisions of the Coastal Act. The site does not contain prime farmlands, and will not adversely impact continued agricultural use of surrounding properties. Concentrating urban development on the east side of El Camino Real is consistent with Coastal Act policies addressing new development, biological resources, visual resources and public access. Therefore, the Commission finds the proposed development, as conditioned, consistent with Sections 30241, 30242, 30250, and 30252 of the Coastal Act.

F. LOCAL COASTAL PLANNING

Section 30604(a) also requires that a coastal development permit shall be issued only if the Commission finds that the permitted development will not prejudice the ability of the

local government to prepare a Local Coastal Program (LCP) in conformity with the provisions of Chapter 3 of the Coastal Act. In this case, such a finding can be made.

The site is located within Subarea II of the North City Future Urbanizing Area Framework Plan (FCFUA), a component of the City of San Diego's North City LCP segment that the Commission certified several years ago. The Commission's action, however, recognized that the Framework Plan was preliminary in nature and did not transfer permit authority in that action. Rather, the plan identified that each subarea would come forward with a specific plan for development. The Framework Plan identified a conceptual circulation element and environmental tier (open space), which have since been slightly refined by the City in its adoption of the Multiple Species Conservation Plan (MSCP) and identification of the Multi-Habitat Preserve Area (MHPA) lands.

The NCFUA Framework Plan designates Subarea II for low-intensity residential development and open space, as well as development consistent with agricultural zoning. The site itself is designated in the City's Land Development Code for very-low density residential development (0.8 dwelling units per acre) and open space (the MSCP portion of the site). The site is zoned agricultural-residential (AR-1-1). The purpose of the AR zones is to accommodate a wide range of agricultural uses while also permitting residential development at a very low density. Churches are considered compatible uses within the residentially-designated areas with a Conditional Use Permit, which was approved by the City.

As discussed above, the proposed development, as conditioned, has been found consistent with all applicable Chapter 3 policies, and the existing certified planning documents for the area. Therefore, the Commission finds that approval of the proposed project will not prejudice the ability of the City of San Diego to prepare a certifiable Local Coastal Program for this area.

G. CALIFORNIA ENVIRONMENTAL QUALITY ACT

Section 13096 of the Commission's Code of Regulations requires Commission approval of Coastal Development Permits to be supported by a finding showing the permit, as conditioned, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

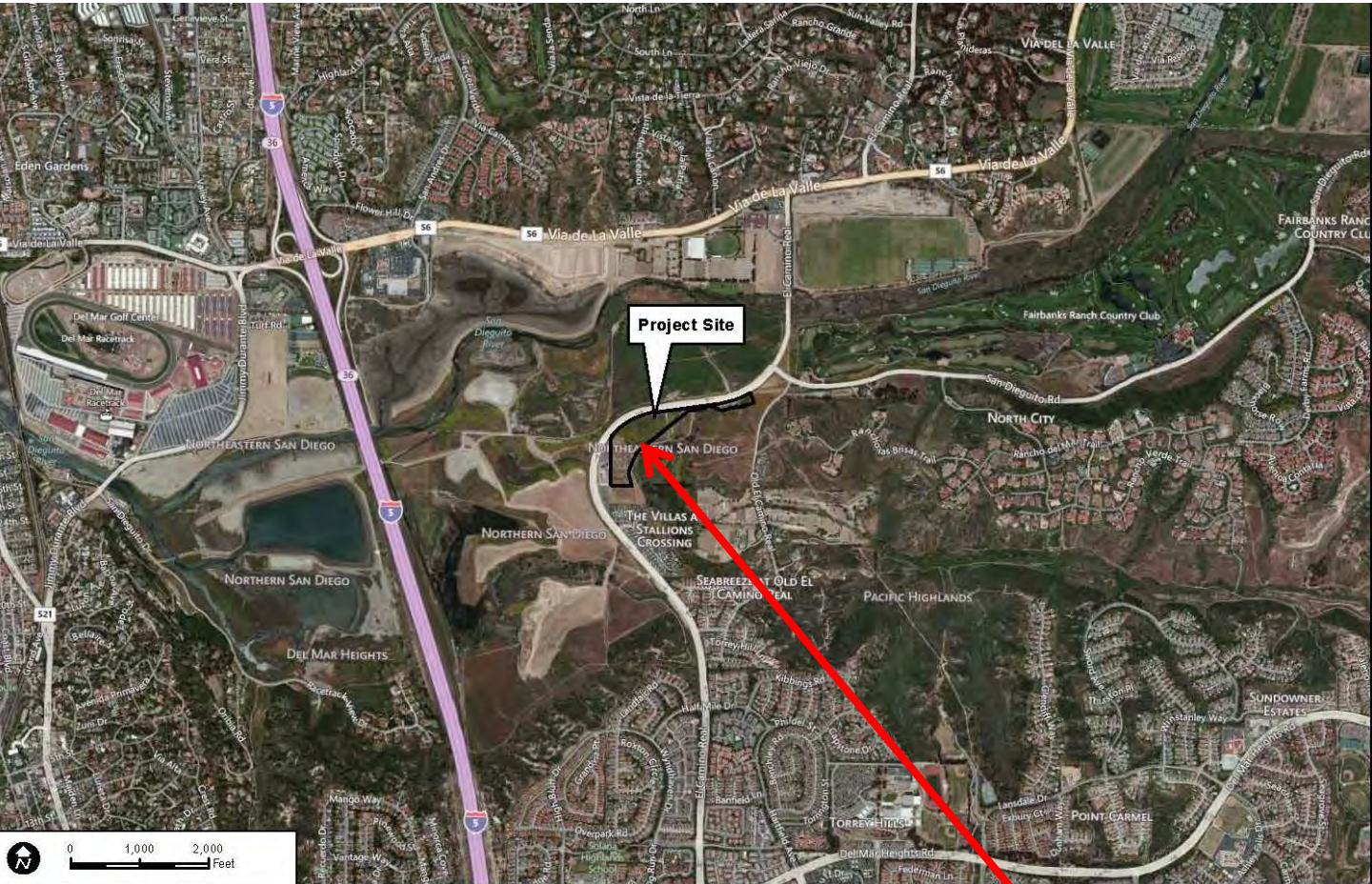
The FEIR adopted for this project concludes that the proposed visual impacts associated with the proposed development are significant and unavoidable and the analyzed alternatives are infeasible. Thus, the City adopted overriding considerations based on the economic, social, and other benefits of the proposed project. Specifically, the City found that the proposed development will promote cultural and religious awareness, will provide a public gathering space, will restore native habitat within Gonzales Canyon, and will provide jobs for area residents, which outweighs the significant visual impacts.

However, the standard of review for the coastal development permit is Chapter 3 of the Coastal Act. As proposed, the development would neither be visually compatible with the surrounding area nor subordinate to the character of its setting, inconsistent with Section 30251 of the Coastal Act.

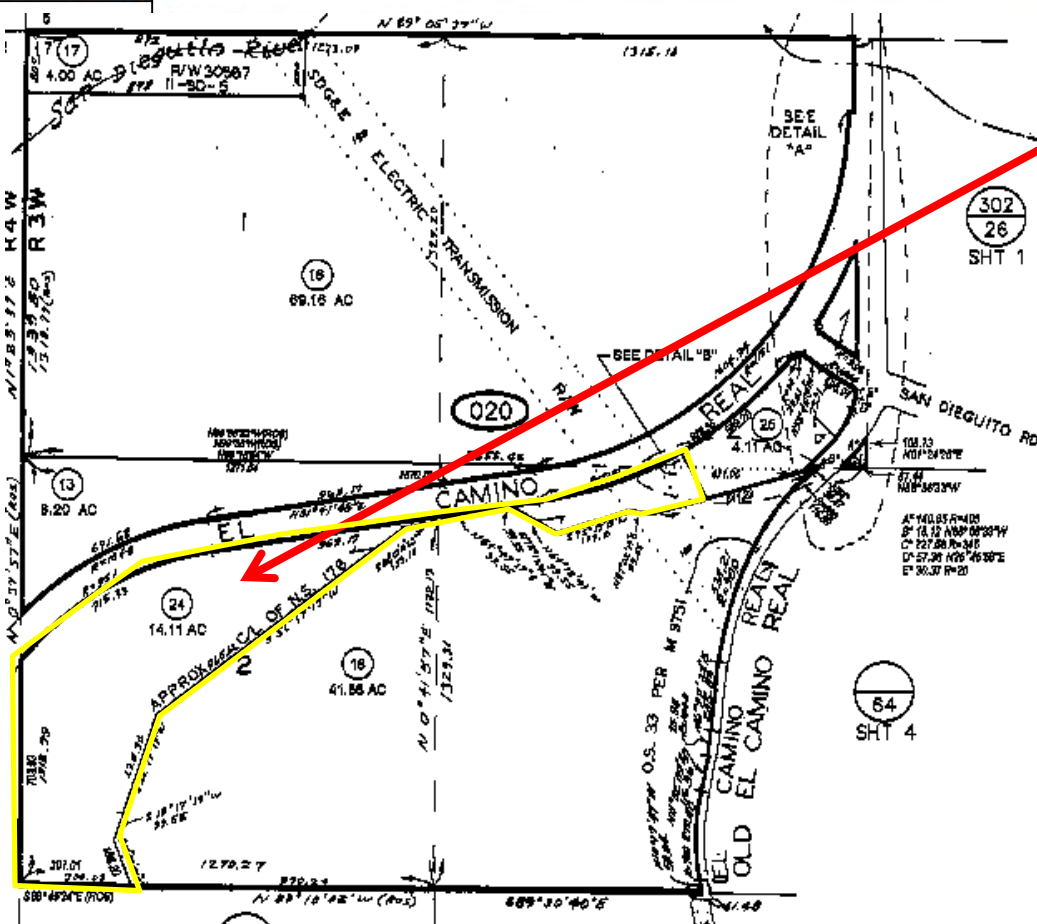
Therefore, the proposed project has been conditioned in order to be found consistent with the Chapter 3 policies of the Coastal Act. Mitigation measures, including conditions that reduce the height and address the exterior treatment and screening of the proposed development will minimize all adverse environmental impacts. As conditioned, there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project, as conditioned, is the least environmentally-damaging feasible alternative and can be found consistent with the requirements of the Coastal Act to conform to CEQA.

Appendix A – Substantive File Documents

- City of San Diego Land Development Code
- North City Future Urbanizing Area Framework Plan
- Final Environmental Impact Report for St. John Garabed Church Project



DUDEK SOURCE: USGS 7.5-Minute Series Del Mar Quadrangle. **FIGURE 1-2**
Vicinity Map



Subject Site



EXHIBIT NO. 1
APPLICATION NO. 6-15-0142
Vicinity Map
 California Coastal Commission

MAXIMUM HEIGHTS OF SURROUNDING DEVELOPMENT



EXHIBIT NO. 2

APPLICATION NO.

6-15-0142

Maximum Height of

Surrounding Dev.



California Coastal Commission

ADJACENT PROTECTED OPEN SPACE AREAS



The subject site is surrounded by vast open space areas, including the San Dieguito River Valley (site of SONGS San Dieguito Wetland Restoration Project) and Gonzales Canyon, that are protected in their natural state with no development potential (shown in green).

EXHIBIT NO. 3

APPLICATION NO.

6-15-0142

Protected Open

Space Areas



California Coastal Commission

DEVELOPMENT POTENTIAL OF SURROUNDING PARCELS



The undeveloped parcels with development potential in the subject project area (shown in red) are zoned AR-1-1, the same zoning as the subject site. This zoning has a 30 ft. height limit, unless there is sufficient room for increased setbacks to allow for increased height, or a deviation is approved by the City. The existing Tack & Feed development is also zoned AR-1-1 (shown in pink) and has the potential to build out under this zoning.

EXHIBIT NO. 4
APPLICATION NO. 6-15-0142
Development
Potential
 California Coastal Commission

PARCEL 3
COTC 97-0241797
APN: 304-020-13

**1.6-acre slope
easement**

PARCEL 1
PM 16964
APN: 299-040-36

PARCEL 'A'
LOT LINE ADJUSTMENT PLAT
NO. U-15122
APN: 304-020-24

**9.2 acres proposed
for conservation**

**4.23 acres
proposed for
development**



EXHIBIT NO. 5

APPLICATION NO.
6-15-0142

Proposed Site Plan

1 of 2



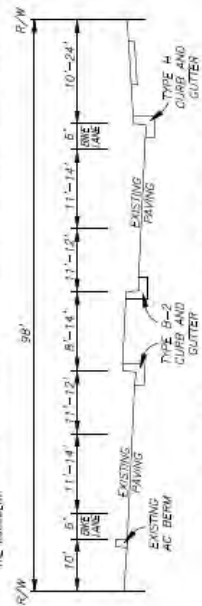
California Coastal Commission

EASEMENTS

- AN EASEMENT FOR PUBLIC UTILITIES AND INDUSTRIAL PURPOSES, REC. 7-14-1947 IN BOOK 2430, PAGE 146 OF O.R., GRANTED TO SDGE.
- AN EASEMENT FOR PUBLIC UTILITIES AND INDUSTRIAL PURPOSES, RECORDED 1-1-1968 IN BOOK 5836, PAGE 163 OF O.R., GRANTED TO SDGE.
- AN EASEMENT FOR PUBLIC UTILITIES AND INDUSTRIAL PURPOSES, REC. 10-7-1957, IN BOOK 5780, PAGE 526 OF O.R., GRANTED TO SDGE.
- AN EASEMENT FOR PUBLIC UTILITIES AND INDUSTRIAL PURPOSES, REC. 7-17-1984 AS INSTRUMENT NO. 84-006479 OF O.R., GRANTED TO SDGE.
- AN EASEMENT FOR SLOPED AND INCIDENTAL PURPOSES, REC. 3-25-1988 AS INSTRUMENT NO. 88-13235 OF O.R., GRANTED TO THE CITY OF SAN JOSE.
- AN EASEMENT TO CONSTRUCT, RECONSTRUCT, MAINTAIN, OPERATE AND REPAIR STORM DRAIN OR DRAINS INCLUDING ANY AND ALL APPURTENANCES AND INCIDENTAL PURPOSES, REC. 4-1-1988 AS INSTRUMENT NO. 88-158332 (PARCEL 17) OF O.R., GRANTED TO THE CITY OF SAN JOSE.
- AN EASEMENT FOR SLOPED AND INCIDENTAL PURPOSES, REC. 4-7-1988 AS INSTRUMENT NO. 88-158332 OF O.R., GRANTED TO THE CITY OF SAN JOSE.
- AN EASEMENT TO CONSTRUCT, RECONSTRUCT, MAINTAIN, OPERATE AND REPAIR STORM DRAIN OR DRAINS INCLUDING ANY AND ALL APPURTENANCES AND INCIDENTAL PURPOSES, REC. 4-7-1988 AS INSTRUMENT NO. 88-158332 (PARCEL 17) OF O.R., GRANTED TO THE CITY OF SAN JOSE.
- AN EASEMENT TO CONSTRUCT, RECONSTRUCT, MAINTAIN, OPERATE AND REPAIR STORM DRAIN OR DRAINS INCLUDING ANY AND ALL APPURTENANCES AND INCIDENTAL PURPOSES, REC. 4-7-1988 AS INSTRUMENT NO. 88-158332 (PARCEL 17) OF O.R., GRANTED TO THE CITY OF SAN JOSE.
- AN EASEMENT TO CONSTRUCT, RECONSTRUCT, MAINTAIN, OPERATE AND REPAIR STORM DRAIN OR DRAINS INCLUDING ANY AND ALL APPURTENANCES AND INCIDENTAL PURPOSES, REC. 4-7-1988 AS INSTRUMENT NO. 88-158332 (PARCEL 17) OF O.R., GRANTED TO THE CITY OF SAN JOSE.
- AN EASEMENT TO CONSTRUCT, RECONSTRUCT, MAINTAIN, OPERATE AND REPAIR STORM DRAIN OR DRAINS INCLUDING ANY AND ALL APPURTENANCES AND INCIDENTAL PURPOSES, REC. 4-7-1988 AS INSTRUMENT NO. 88-158332 (PARCEL 17) OF O.R., GRANTED TO THE CITY OF SAN JOSE.
- AN EASEMENT TO CONSTRUCT, RECONSTRUCT, MAINTAIN, OPERATE AND REPAIR STORM DRAIN OR DRAINS INCLUDING ANY AND ALL APPURTENANCES AND INCIDENTAL PURPOSES, REC. 4-7-1988 AS INSTRUMENT NO. 88-158332 (PARCEL 17) OF O.R., GRANTED TO THE CITY OF SAN JOSE.
- AN EASEMENT TO CONSTRUCT, RECONSTRUCT, MAINTAIN, OPERATE AND REPAIR STORM DRAIN OR DRAINS INCLUDING ANY AND ALL APPURTENANCES AND INCIDENTAL PURPOSES, REC. 4-7-1988 AS INSTRUMENT NO. 88-158332 (PARCEL 17) OF O.R., GRANTED TO THE CITY OF SAN JOSE.
- AN EASEMENT TO CONSTRUCT, RECONSTRUCT, MAINTAIN, OPERATE AND REPAIR STORM DRAIN OR DRAINS INCLUDING ANY AND ALL APPURTENANCES AND INCIDENTAL PURPOSES, REC. 4-7-1988 AS INSTRUMENT NO. 88-158332 (PARCEL 17) OF O.R., GRANTED TO THE CITY OF SAN JOSE.
- AN EASEMENT TO CONSTRUCT, RECONSTRUCT, MAINTAIN, OPERATE AND REPAIR STORM DRAIN OR DRAINS INCLUDING ANY AND ALL APPURTENANCES AND INCIDENTAL PURPOSES, REC. 4-7-1988 AS INSTRUMENT NO. 88-158332 (PARCEL 17) OF O.R., GRANTED TO THE CITY OF SAN JOSE.

NON-PLOTTABLE EASEMENTS:

- AN EASEMENT FOR PUBLIC UTILITIES AND INDUSTRIAL PURPOSES, REC. 4-3-1907 IN BOOK 408 OF DEEDS, PAGE 384 IN FAVOR OF THE CITY OF SAN JOSE, CANNOT BE DETERMINED FROM RECORD INFORMATION.
- AN EASEMENT FOR CONSTRUCTION, OPERATION, MAINTAINING ACCESS ROADS, DRAINAGE STRUCTURES, WATER, SEWER, GAS, ELECTRIC, COMMUNICATIONS AND OTHER UTILITIES, REC. 7-21-1983 AS INSTRUMENT NO. 83-24980 OF O.R., GRANTED TO VARIOUS PARTIES. THE LOCATION OF THIS EASEMENT HAS BEEN COMPILED OR RECEIVED IN VARIOUS OTHER INSTRUMENTS OF RECORD.
- AN EASEMENT FOR PUBLIC UTILITIES AND INDUSTRIAL PURPOSES, REC. 4-3-1984 AS INSTRUMENT NO. 84-124833 OF O.R., GRANTED TO SDGE.



**MHPA area to be preserved
(approx. 9.2 acres)**

Proposed Project

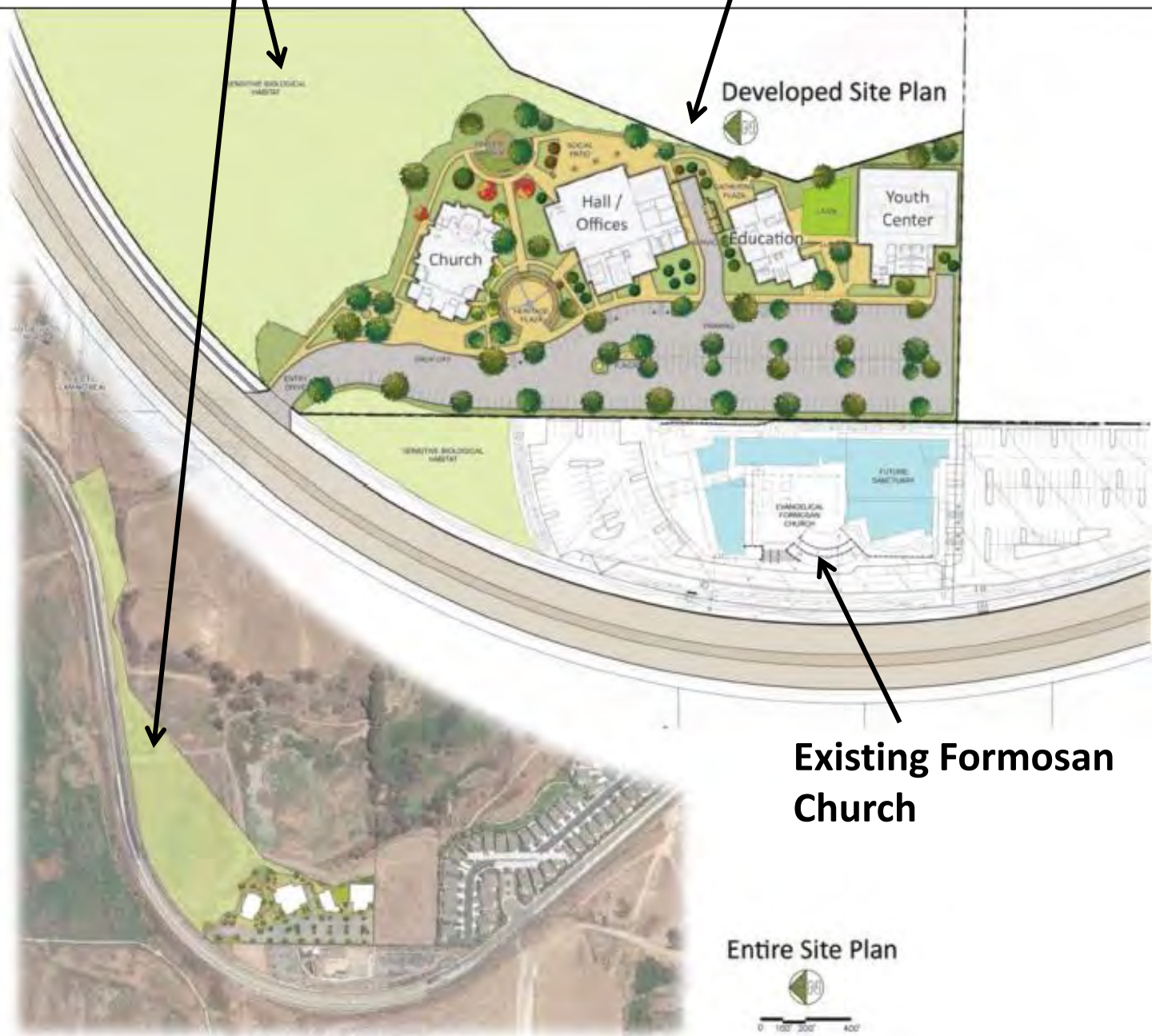




EXHIBIT NO. 6

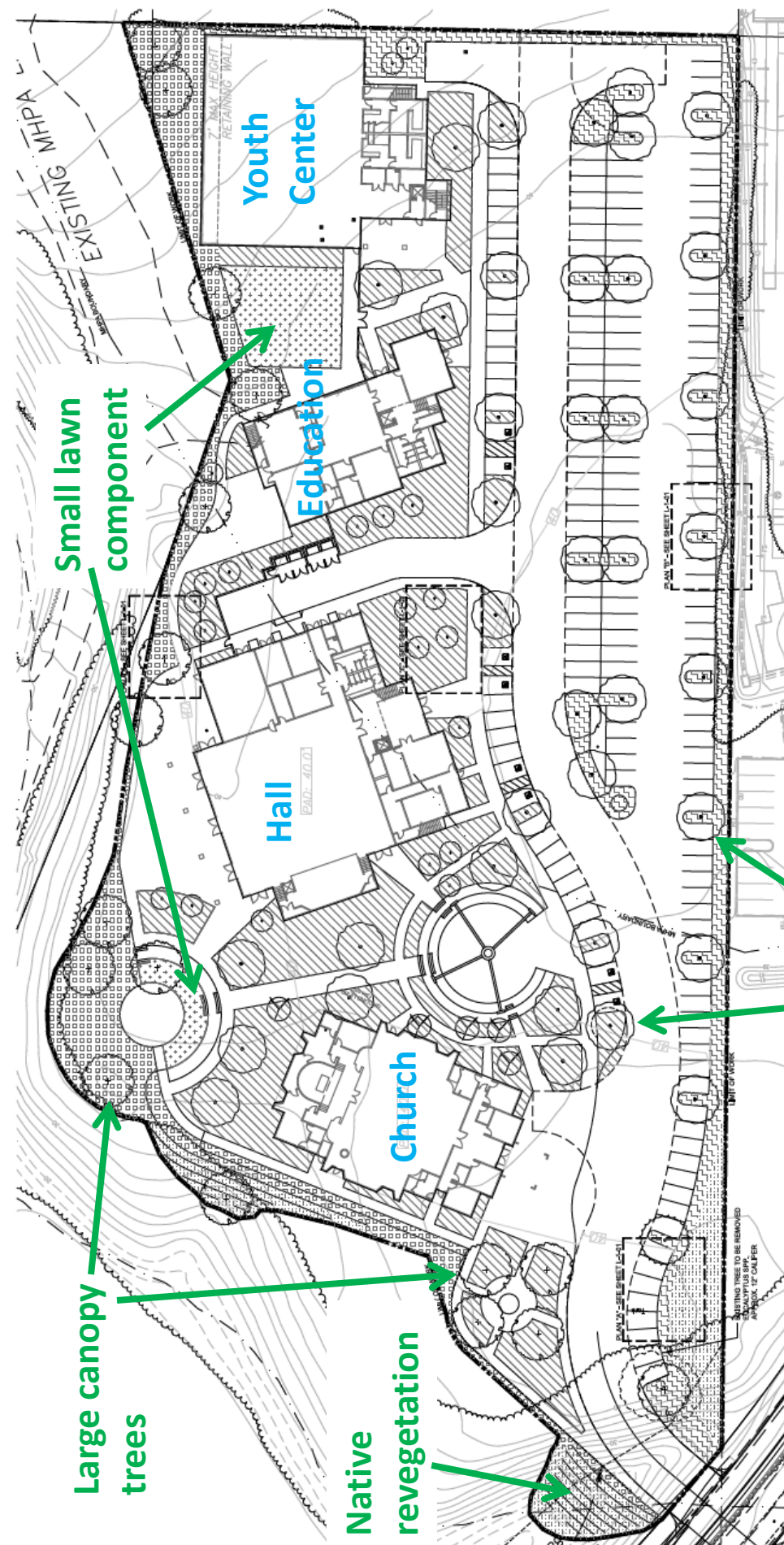
APPLICATION NO.

6-15-0142

Project Rendering



California Coastal Commission



Small lawn component

Large canopy trees

Native revegetation

Small canopy trees

DESIGN INTENT

THE INTENT OF THE LANDSCAPE DESIGN IS TO PROVIDE A MEANINGFUL AND WELCOMING ENVIRONMENT FOR THE COMMUNITY. THE PLANT PALETTE IS OF SPECIES NATIVE TO THE SAN DIEGO RIVER VALLEY AND NON-INVASIVE EXOTIC SPECIES RELEVANT TO THE HISTORY AND MISSION OF THE CHURCH. THE COMPOSITION OF PLANTS ON THE SITE WILL BE DESIGNED TO PROTECT AND ENHANCE THE EXISTING ECOSYSTEM. THE LANDSCAPE DESIGN WILL BE USED TO COLLABORATE WITH THE COMMUNITY TO INTRODUCE PLANTS TO THE RIVER ECOSYSTEM. SITE ELEMENTS INCLUDE A BIODIVERSITY GARDEN TERRACE.

LEGEND

	WESTERN PERIMETER
	CHURCH GARDENS
	LAWN
	UNIMPACTED AND TEMPORARY IMPACT AREAS

NOTES: LAWN AND A PERENNIAL TRAIL ALONG THE EASTERN BLUFF (ADJACENT TO THE FACILITIES). ALL FACILITIES WILL MEET ADA REQUIREMENTS. CANOPY TREES WILL SHADE PORTIONS OF THE PARKING LOT, THE BUILDINGS, AND PAVED AREAS TO MINIMIZE THE HEAT ISLAND EFFECT. THE LANDSCAPE DESIGN WILL BE USED TO COLLABORATE WITH THE COMMUNITY TO INTRODUCE PLANTS TO THE RIVER ECOSYSTEM. THE LANDSCAPE DESIGN WILL BE USED TO COLLABORATE WITH THE COMMUNITY TO INTRODUCE PLANTS TO THE RIVER ECOSYSTEM. THE LANDSCAPE DESIGN WILL BE USED TO COLLABORATE WITH THE COMMUNITY TO INTRODUCE PLANTS TO THE RIVER ECOSYSTEM.

EXHIBIT NO. 7

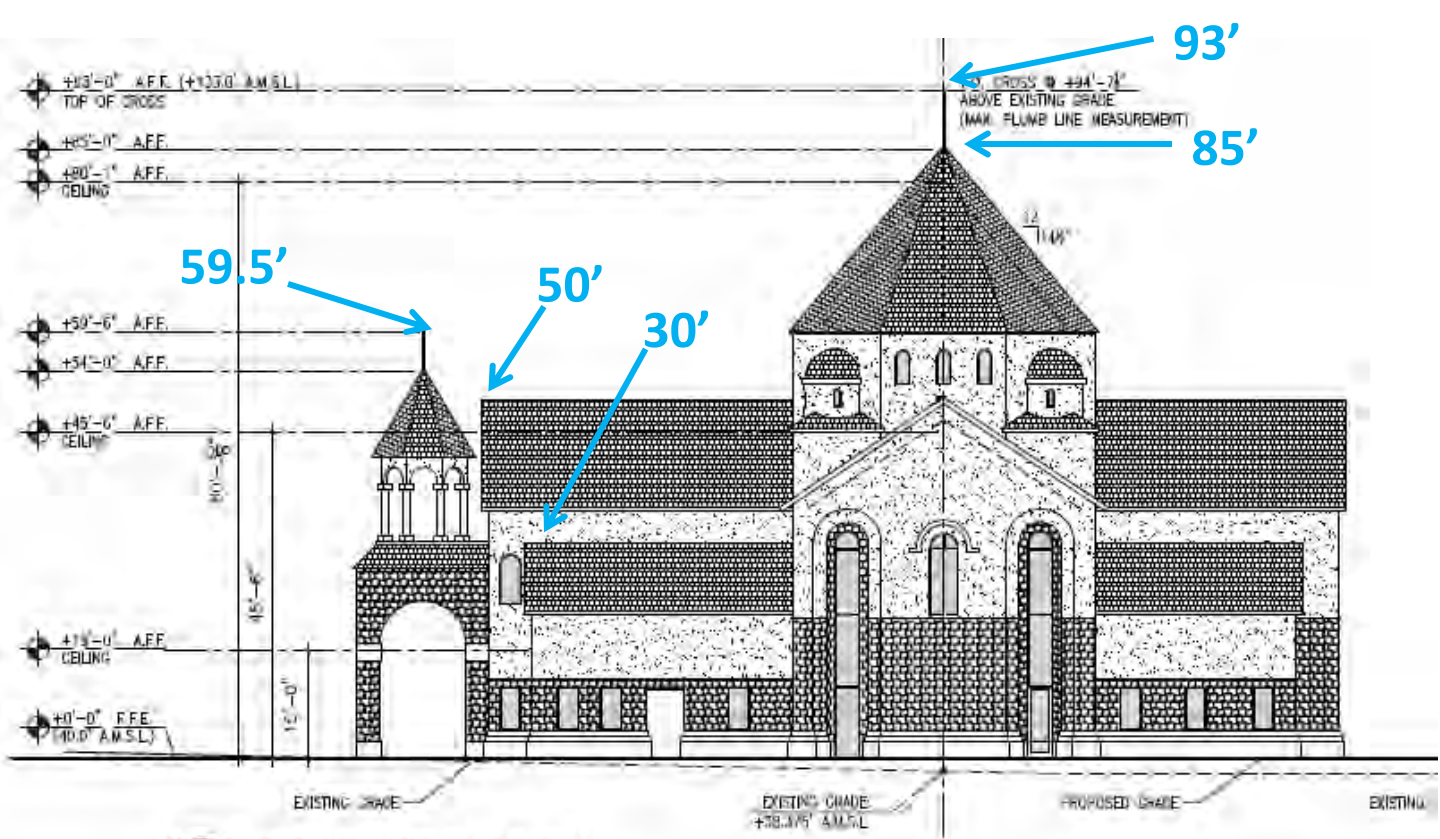
APPLICATION NO.

6-15-0142

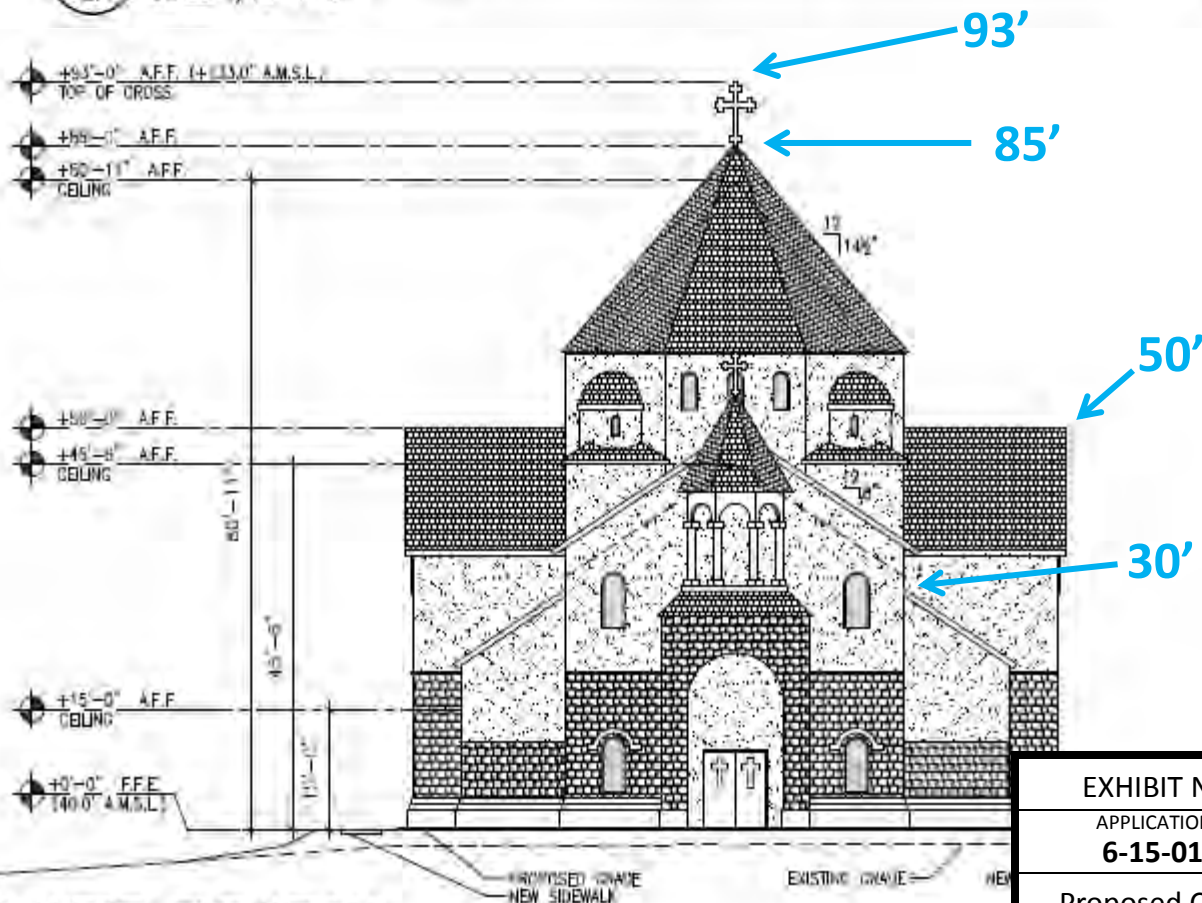
Proposed Landscape

Plan

California Coastal Commission



1 SOUTH ELEVATION
A2.0 SCALE: 1/16"=1'-0"



4 WEST ELEVATION
A2.0 SCALE: 1/16"=1'-0"

EXHIBIT NO. 8

APPLICATION NO.

6-15-0142

Proposed Church

Elevations



California Coastal Commission

**STAFF RECOMMENDED
REDUCED HEIGHT**

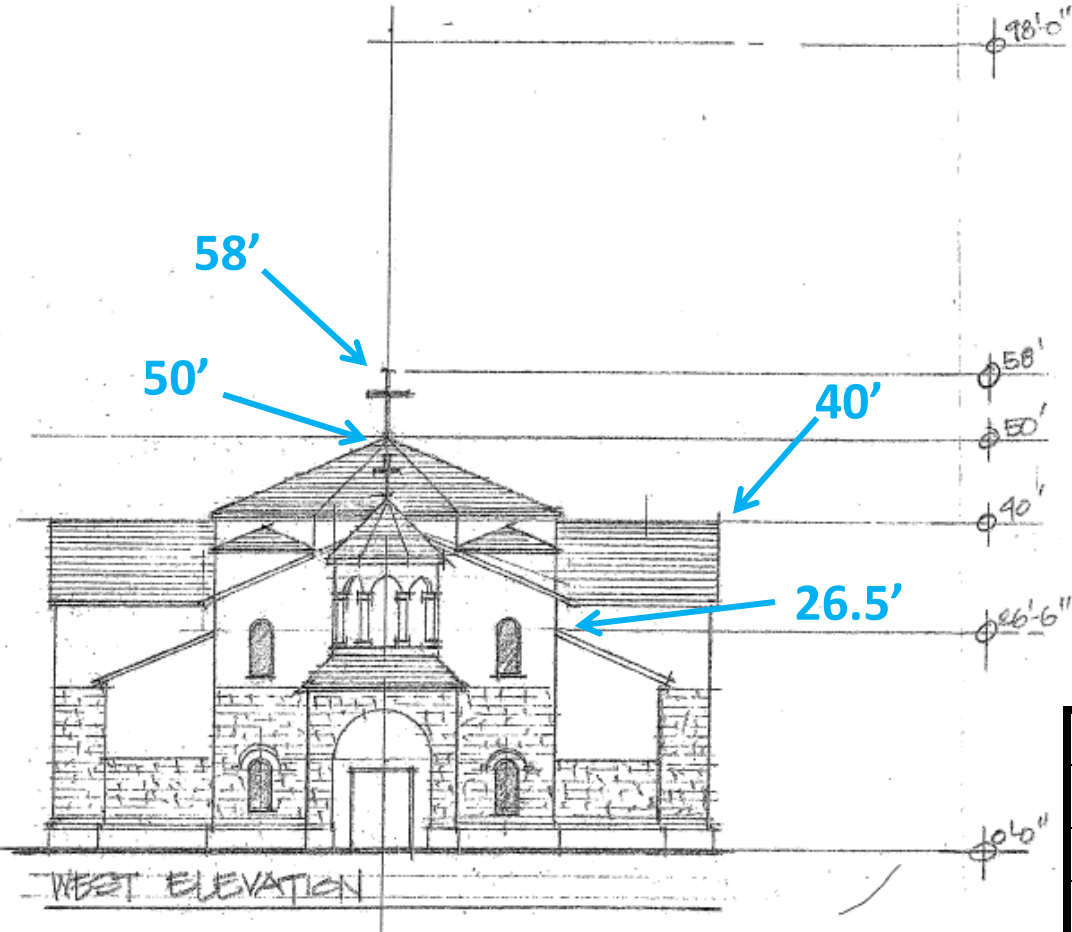
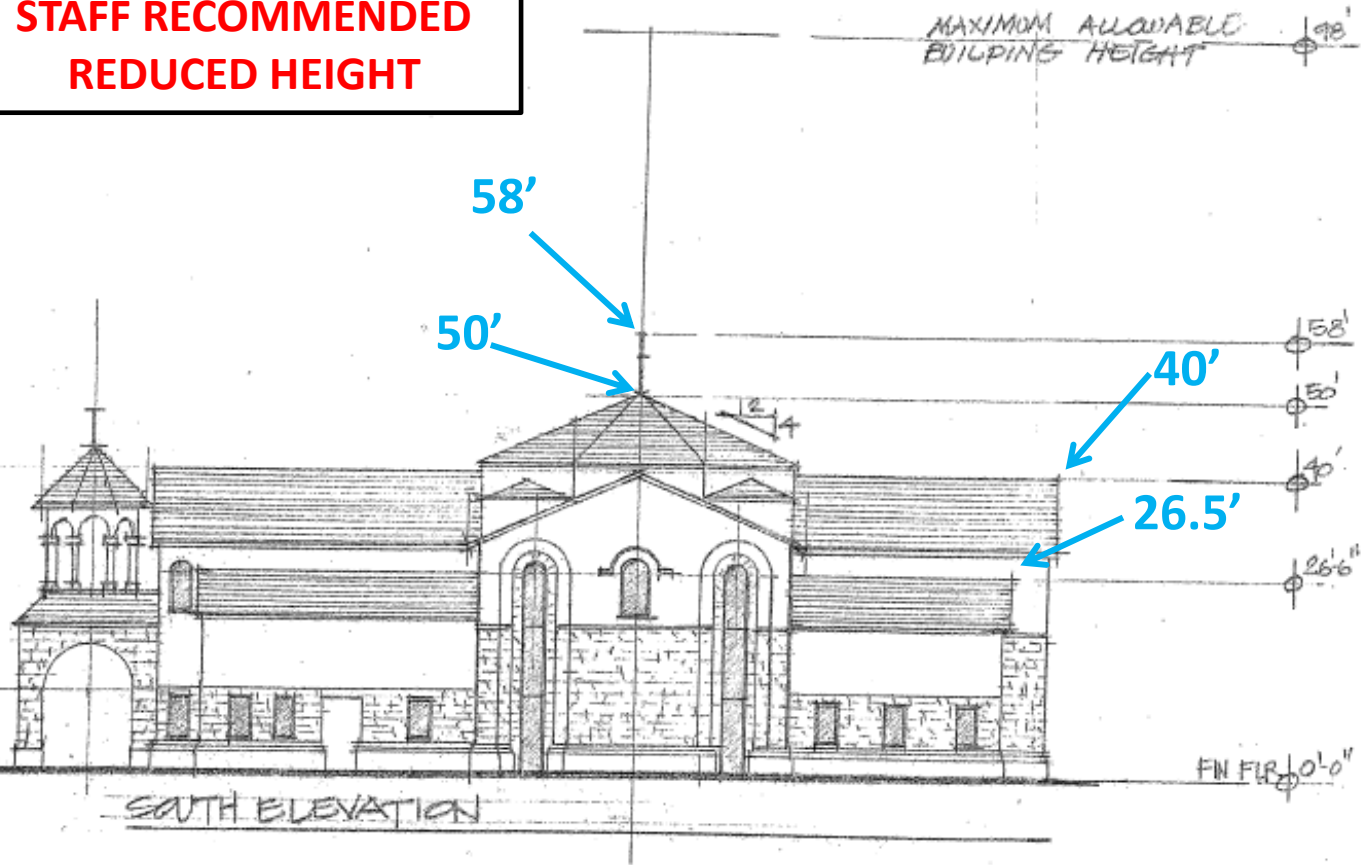


EXHIBIT NO. 9

APPLICATION NO.

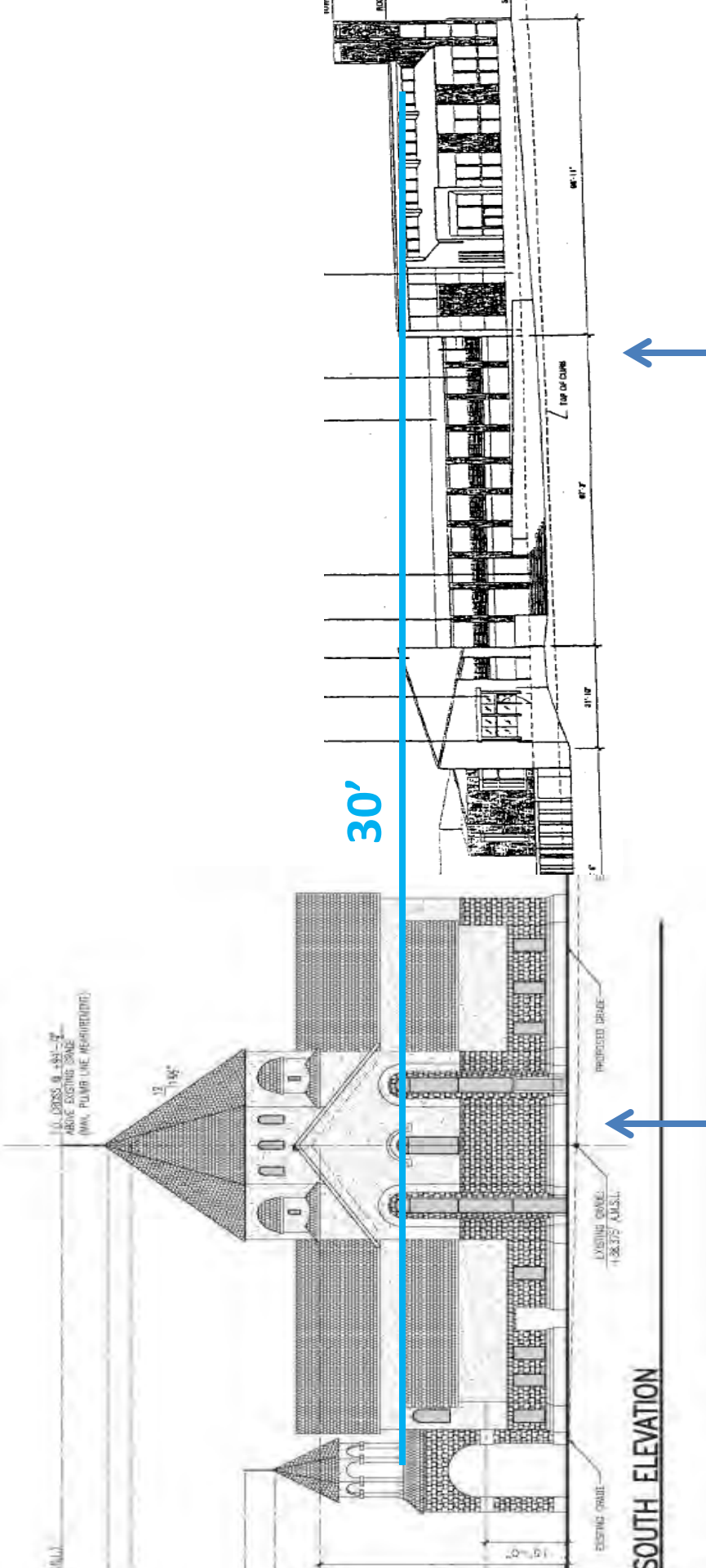
6-15-0142

Reduced Height

Church Elevations



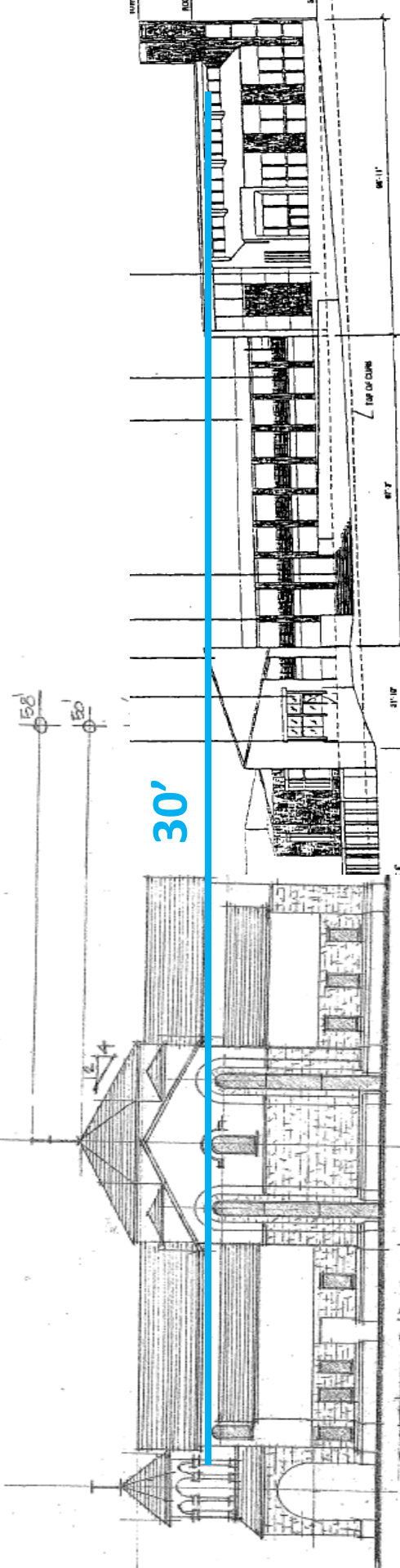
California Coastal Commission



**Proposed Project
Church Elevations**

**Approved Formosan
Church Elevations**

MAXIMUM ALLOWABLE
BUILDING HEIGHT



**Reduced Height Church
Elevations per Special
Condition 1**

**Approved Formosan
Church Elevations**

EXHIBIT NO. 12

APPLICATION NO.

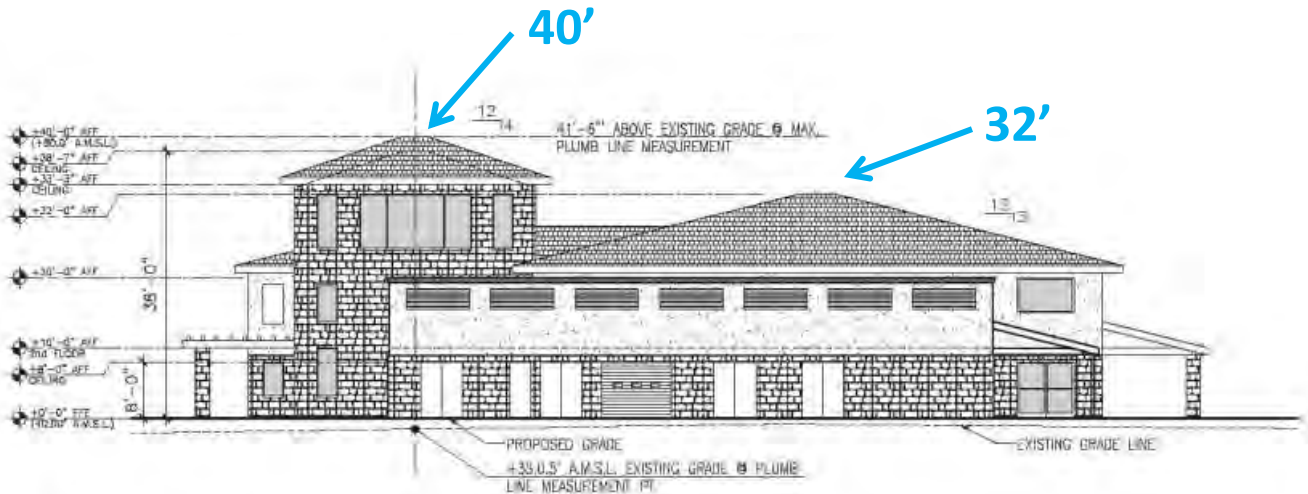
6-15-0142

Reduced Church vs.

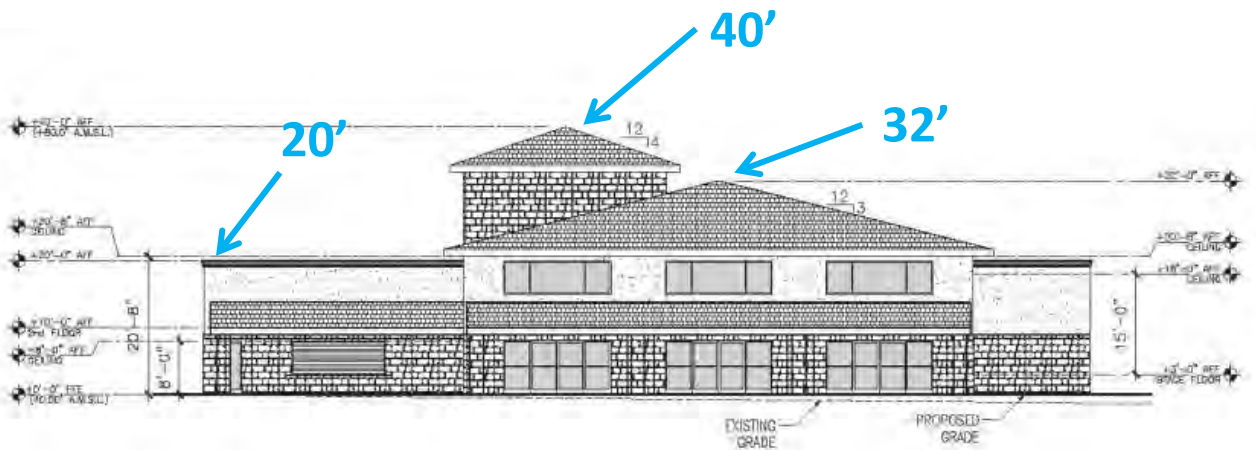
Formosan Elevations



California Coastal Commission



1 SOUTH ELEVATION
A2.1



2 EAST ELEVATION
A2.1

EXHIBIT NO. 13

APPLICATION NO.

6-15-0142

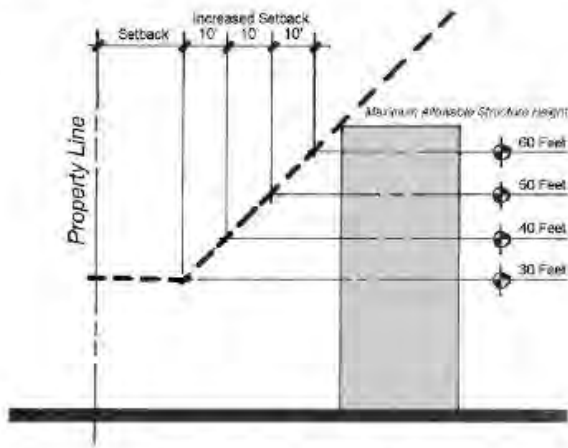
Proposed Hall

Elevations



California Coastal Commission

Maximum Structure Height in Agricultural Zones



Per San Diego Municipal Code 131.0344:

A Structure may exceed the 30-foot structure height limit if the front, side, and rear setbacks are each increased by 10 feet for each 10 feet, or portion thereof, of structure height above 30 feet, except as limited by the regulations of Chapter 13, Article 2 (Overlay Zones).

(Added 12-9-1997 by O-18451 N.S. : effective 1-1-200)

Black areas = setback deviations approved by City

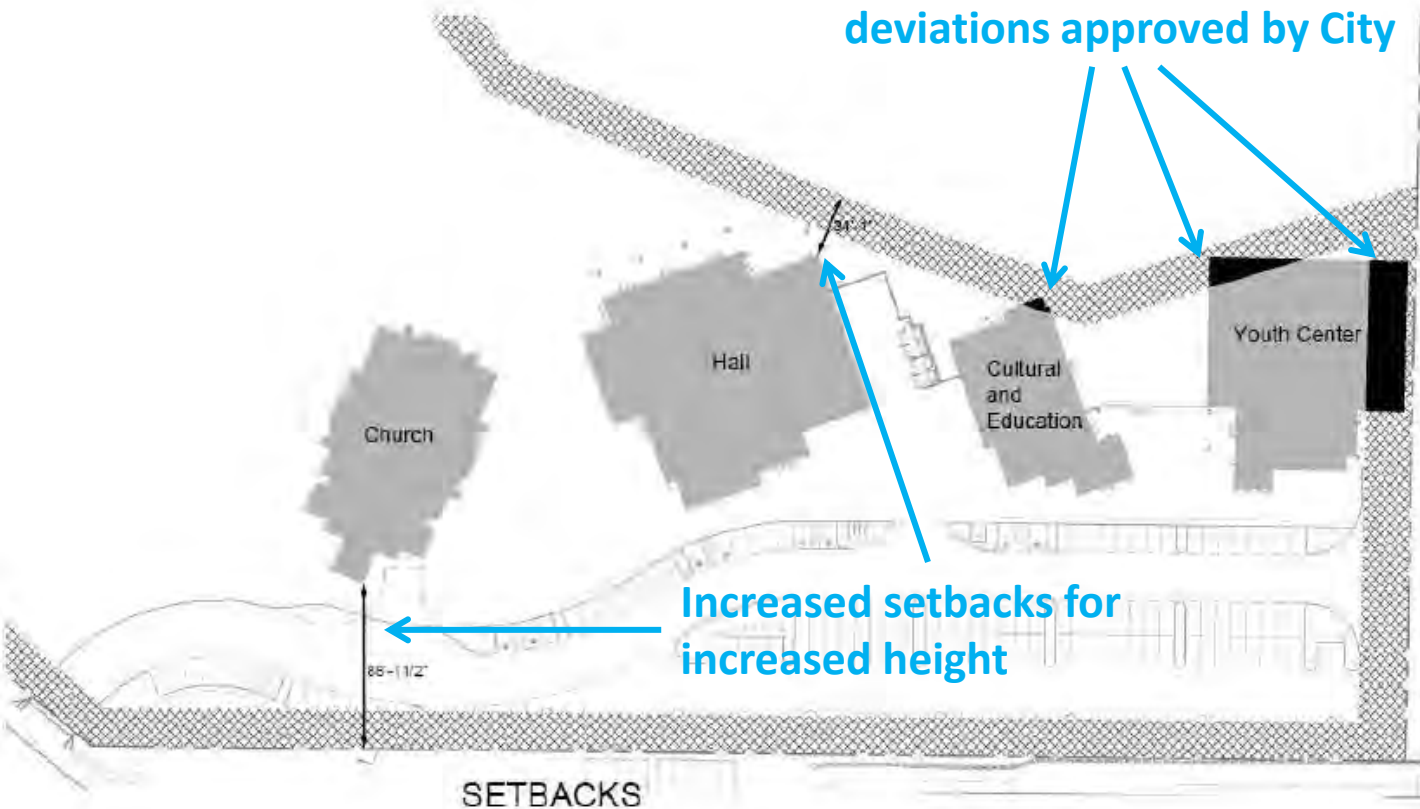


EXHIBIT NO. 14

APPLICATION NO.

6-15-0142

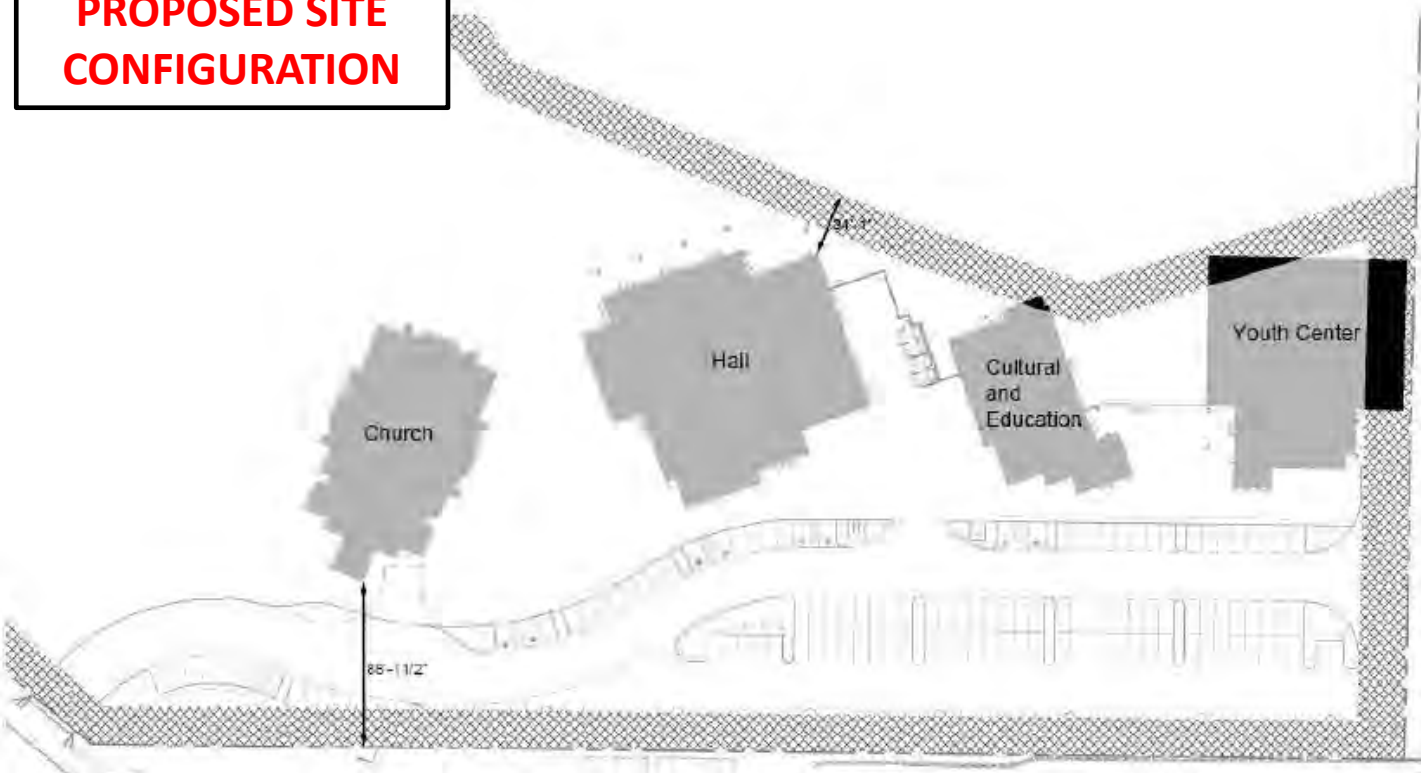
Setback Deviations &

Height Increases



California Coastal Commission

PROPOSED SITE CONFIGURATION



STAFF RECOMMENDED SITE RECONFIGURATION

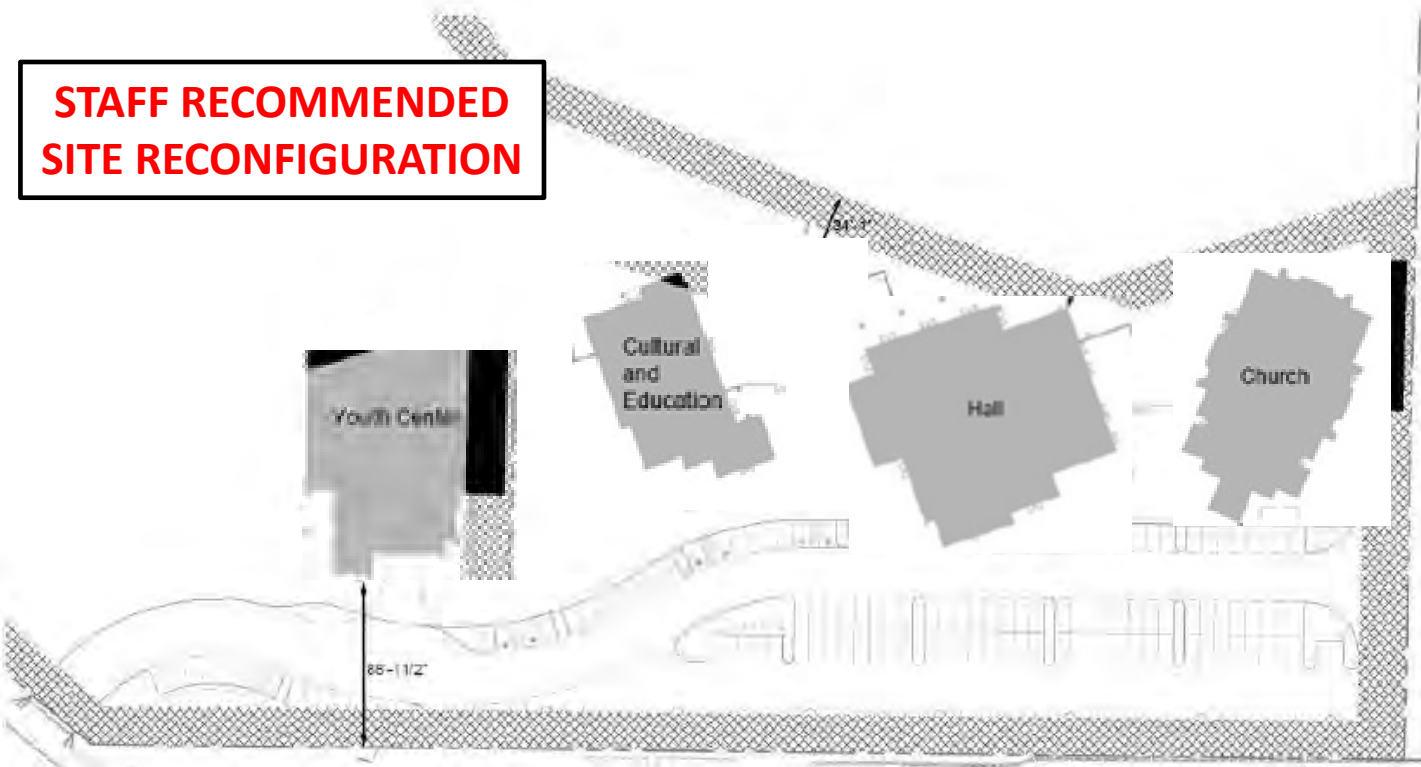


EXHIBIT NO. 15

APPLICATION NO.

6-15-0142

Staff Rec. Site

Reconfiguration



California Coastal Commission

FORNIA COASTAL COMMISSION

GO AREA
TROPOLITAN DRIVE, SUITE 103
GO, CA 92108-4421
7-2370

FILE COPY

April 14, 2014

Jeffery Szymanski
San Diego County
1222 First Avenue, MS 501
San Diego, CA 92101

Re: Draft Project Environmental Impact Report for St. John Garabed Church, SAP
Project No. 24001804

Dear Mr. Steinberger,

The above referenced Draft Environmental Impact Report was received in this office on March 5, 2014. We appreciate the opportunity to comment on the environmental review process related to the proposed construction of a church campus on a 13.37-acre parcel in the North City Future Urbanization Area located along El Camino Real between Sea Country Land and Via de la Valle within the County of San Diego. Specifically, it is our understanding that the project includes the construction of four buildings to include 1) an 8,740 sq. ft. 450-seat church proposed at approximately 93' tall; 2) an 18,090 sq. ft. multi-purpose hall with a main assembly area of 6,200 sq. ft. to accommodate up to 500 persons in a banquet layout; 3) an 11,010 sq. ft. Cultural and Education building with classrooms for Sunday School and religious instruction; and, 4) a 13,840 sq. ft. youth recreational facility; as well as various other associated improvements and restoration of environmentally sensitive lands.

As we understand, the development would require a Conditional Use Permit (CUP), Site Development Permit (SDP), Planned Development Permit (PDP), and an MHPA Boundary Line Adjustment all to be issued by the County of San Diego. In addition, the project will also require a Coastal Development Permit. Given that the project is located in an area the remains within the Coastal Commission's permit jurisdiction, the Coastal Development Permit will be issued by the Coastal Commission; and therefore, the standard of review is Chapter 3 of the Coastal Act. This project raises a number of consistency concerns with the Coastal Act policy including the conversion of agricultural land for development, development that will be out of character of the surrounding river valley, impacts to public views throughout the river valley, and potential impacts to Environmentally Sensitive Habitat Areas (ESHA). We offer these comments as general direction relative to the policies of the Coastal Act that should be incorporated into the environmental review of any development that would either directly or indirectly affect the resources of the California Coastal Zone. Detailed below are the analyses necessary to assure compliance with the Coastal Act.

1. Impacts to Existing Viewsheds and Community Character.

The project site is located in an area where the majority of adjacent land uses consist of undeveloped land or farmland. As proposed, the project includes four buildings

EXHIBIT NO. 16

APPLICATION NO.

6-15-0142

CCC Comment Letter

On Draft EIR



California Coastal Commission

totaling over 57,000 square feet. **Section 30251** of the Coastal Act requires new development to be designed to be visually compatible with the character of surrounding areas. Based on Commission staffs' initial review of the area, buildings this size cannot be considered in the same character of the surrounding community. In order for structures of this size to be approvable, the EIR should include evaluation as to how the project can be considered of the same scale and character of the surrounding community. Please include adjacent structure's Floor Area Ratios (FAR), etc., as examples for existing community character.

In addition, the height for the proposed structures reaches a maximum of 93' tall. **Section 30251** of the Coastal Act further requires that development shall be sited and designed to protect views along the ocean and scenic coastal areas. Given the size and height of the proposed structures there is a significant chance that the proposed development will result in impacts to existing public views of the river valley/coast/ocean. In addition, the environmental document includes a "Reduced Height" alternative which would limit all structures to a maximum height of 45 feet. This alternative was found to result in the least environmental impacts while still meeting some of the project objectives, and was found to be the environmentally superior alternative. In order to be found consistent with **Section 30251** of the Coastal Act, all significant views of the coastal shall be protected. In this case, the draft EIR failed to include an alternative that would eliminate all significant view obstructions. That being said, an alternative was identified, that would reduce impacts to coastal views. Thus, in order for the project to be found consistent with the Coastal Act, the project must first eliminate an alternative that would protect all significant public views. Subsequently, if absolute elimination of all significant view impacts is not feasible, the "reduced Height" alternative identified by the environmental document is considered more consistent with Section 30251 and shall be the selected building design alternative.

2. Protection of Agricultural Land.

Coastal Act Sections 30241 and 30242 serve to protect the use of lands within the coastal zone for agricultural uses. In this case, a significant portion of the subject property has been used for agricultural and has been identified as both Farmland of Local Importance and Prime Farmland in the associated Notice of Preparation. However, the DEIR only includes that agricultural land considered Farmland of Local Importance exists onsite. Please clarify how the agricultural land onsite is classified by the DOC Farmland Mapping and Monitoring Program. Coastal Act **Section 30241** requires the maximum amount of prime agriculture shall be maintained in agricultural production. In addition, Coastal Act **Section 30242** requires that lands suitable for agricultural use shall not be converted to nonagricultural uses unless continued or renewed use is not feasible. While the DEIR does include findings that the land used for agriculture onsite has not been productive agricultural land, the document also includes that efforts have been made, including the installation of a well and filtration device to reduce water costs and make agricultural use more profitable. Thus, it has not been established that agricultural use on the subject site is

not feasible. As such, the DEIR shall include how the conversion of the agricultural lands on site can be found consistent with Sections 30241 and 30242 of the Coastal Act.

3. Environmentally Sensitive Habitat Areas (ESHA).

As proposed, the construction of the St. garbed church complex will result in the loss of approximately 0.3-acres of Diegan coastal sage scrub (CSS) habitat associated with access to the site. Diegan coastal sage scrub habitat is considered the preferred habitat for the federally-listed coastal California gnatcatcher and is therefore is protected by the Coastal Act. The Coastal Act provides a definition of environmentally sensitive habitat area (ESHA) as: "Any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments" (Section 30107.5). While the impacts to CSS associated with the proposed development can be considered small in scale, given the habitat's proximity to San Dieguito River and other sensitive habitat areas, the habitat in question may be considered ESHA. Coastal Act **Section 30240 (a)** limits loss of ESHA to only uses dependent on those resources. Examples of resource dependent uses include restoration, nature study, and in some cases public nature trails. The Coastal Act, however, does not consider the construction of church facilities as a resource dependent use. The EIR should, therefore, evaluate how the project can be revised to avoid the impacts. As an example, it appears that there is an opportunity for alternative access to the site through lands located directly south of the proposed entrance. The EIR should evaluate any alternative access locations that will not require removal of any sensitive habitat.

If the habitat area impacted does not meet the definition of ESHA, a detailed evaluation as to why the habitat is not ESHA, and thus, why any impacts could be found consistent with **Coastal Act Section 30240** shall be included in the EIR. If the habitat can be determined not to be ESHA, mitigation must still be provided. Typically, the Commission requires mitigation for impacts to CSS at a ratio of 2:1. In addition, at least one of the two mitigation components shall be satisfied through the creation of new upland habitat area, of similar biological value, and located within the coastal zone to ensure there is no net loss of ESHA within the Coastal Zone over time. The EIR should address mitigation measures for any impacts to CSS at mitigation values consistent with is what is traditionally required in order to be found consistent with applicable Coastal Act policy as well as previous Commission action. As such, the Biological Mitigation Measures listed in the EIR shall include at least 0.3-acres of creation of CSS as well as 0.3-acres of restoration to existing CSS.

Finally, Mitigation Measure MMBIO6 allows the landscaping to include non-native plants for areas not adjacent to the City's Multi-Habitat Planning Area (MHPA). However, given the project's proximity to other sensitive habitats as well as San Dieguito River, MMBIO6 shall be modified to require native landscaping on the entire site.

April 14, 2015
Page 4

The Commission respectfully requests that you please address the above comments in the final EIR document. We look forward to future collaboration on the proposed development and are available to address any question or concerns you may have. Please contact Toni Ross at the Commission's San Diego office if you have any questions on the submitted comments.

Sincerely,

Toni Ross
Coastal Program Analyst
San Diego District



APPROX. 90 FT.

APPROX. 60 FT.

APPROX. 30 FT.

This image was taken from the Dust Devil Nature Trail, facing east. The gray vehicle in the center is driving southbound on El Camino Real, and the Formosan Church is visible on the right. The project site is to the left of and behind the Formosan Church from this view, and will reach a maximum height of 93 ft.

EXHIBIT NO. 17

APPLICATION NO.

6-15-0142

Site Visit Photos

1 of 4



California Coastal Commission



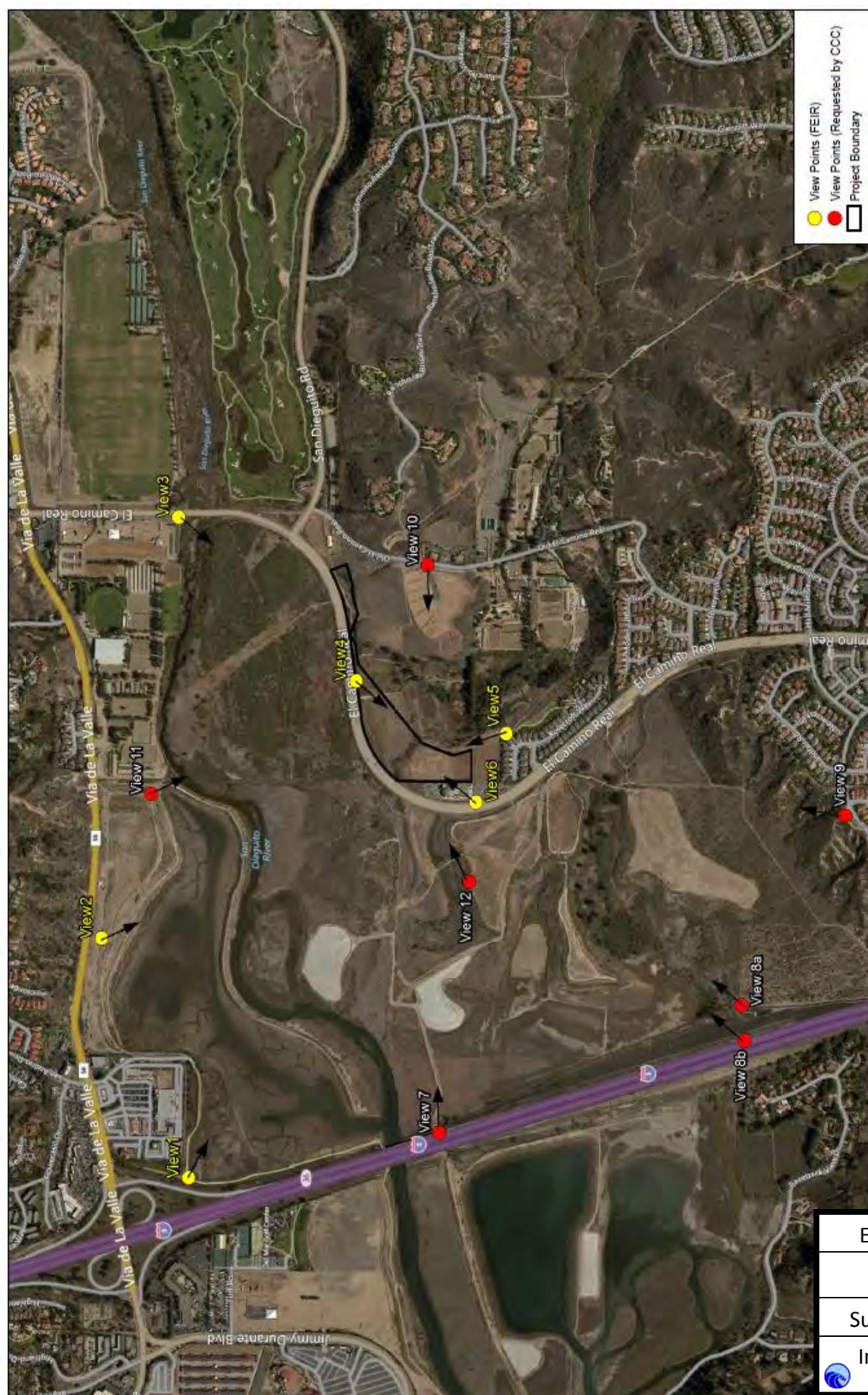
This image was taken from further west on the Dust Devil Nature Trail, facing east. The Formosan Church is visible on the right, with the subject site to the left of the Formosan Church. The telephone pole visible behind the Formosan Church is approximately 61 ft. tall. The proposed church building is 93 ft. tall, approximately 32 feet taller than the telephone pole.



This image was taken from the Dust Devil Nature Trail parking lot and trailhead, facing northeast. The Formosan Church is visible on the right, with the subject site behind (north of) the Formosan Church. The telephone pole visible behind the Formosan Church is approximately 61 ft. tall. The proposed church building is 93 ft. tall, approximately 32 feet taller than the telephone pole.



This image was taken from the Coast to Crest trail near the site of the JPA outdoor amphitheater, facing southeast. The San Dieguito Wetland Restoration Site is visible in the forefront, and the Formosan Church is visible just beyond. The subject site is in front of (north of) the Formosan Church from this location. The proposed church building would reach 93 ft. tall, approximately three times the height of the main roofline of the Formosan Church, which would dominate and contrast with this natural setting.



- View Points (FEIR)
- View Points (Requested by CCC)
- Project Boundary

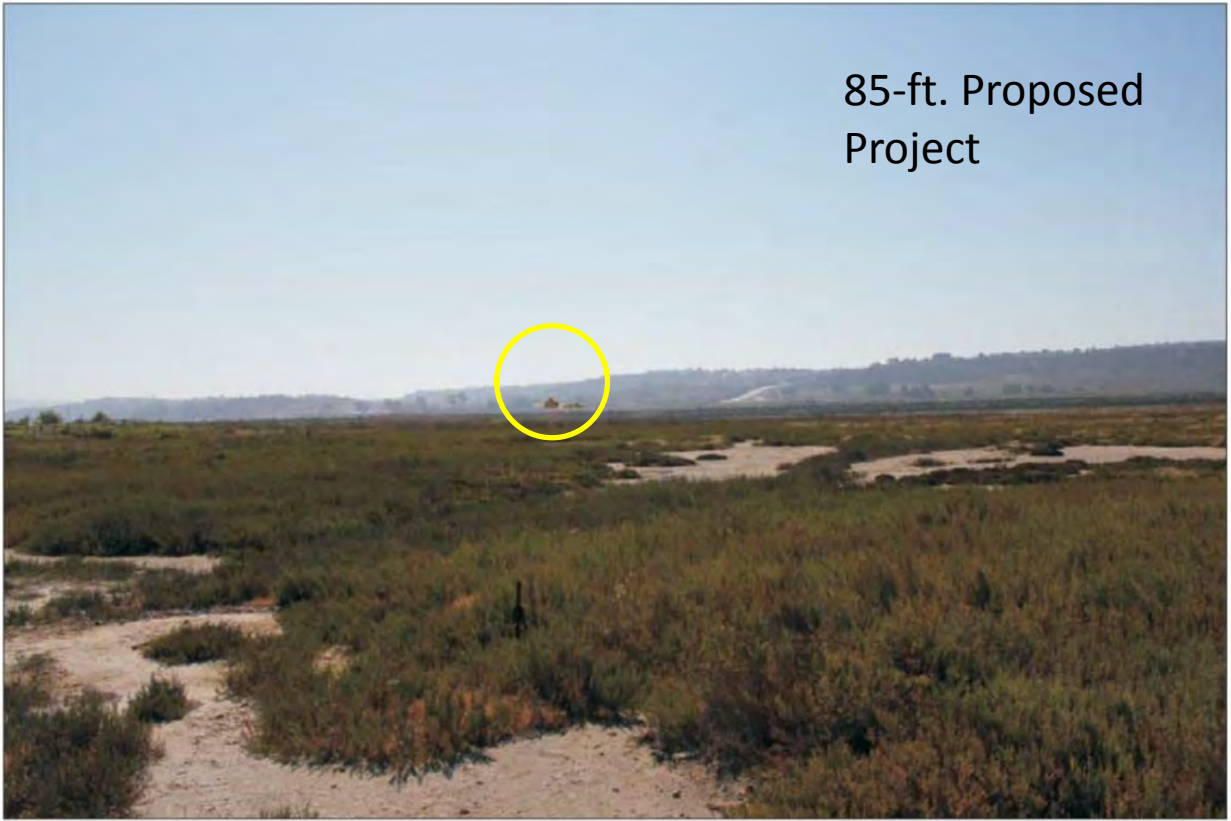
FIGURE 1
Visual Simulations Key Map

on-site Letter - Visual Resources Memorandum for the St. John Garabed Church Project EIR

EXHIBIT NO. 18
APPLICATION NO. 6-15-0142
Submitted Visual
Impact Analysis
California Coastal Commission

Viewpoint 1

85-ft. Proposed
Project



VISUAL SIMULATION—From Lagoon Trail at Via De La Via de la Valle Exit

45-ft. “Reduced
Height Alternative”



VISUAL SIMULATION—From Lagoon Trail at Via De La Via de la Valle Exit

Viewpoint 2

85-ft. Proposed
Project



VISUAL SIMULATION—From Future Visitor Center

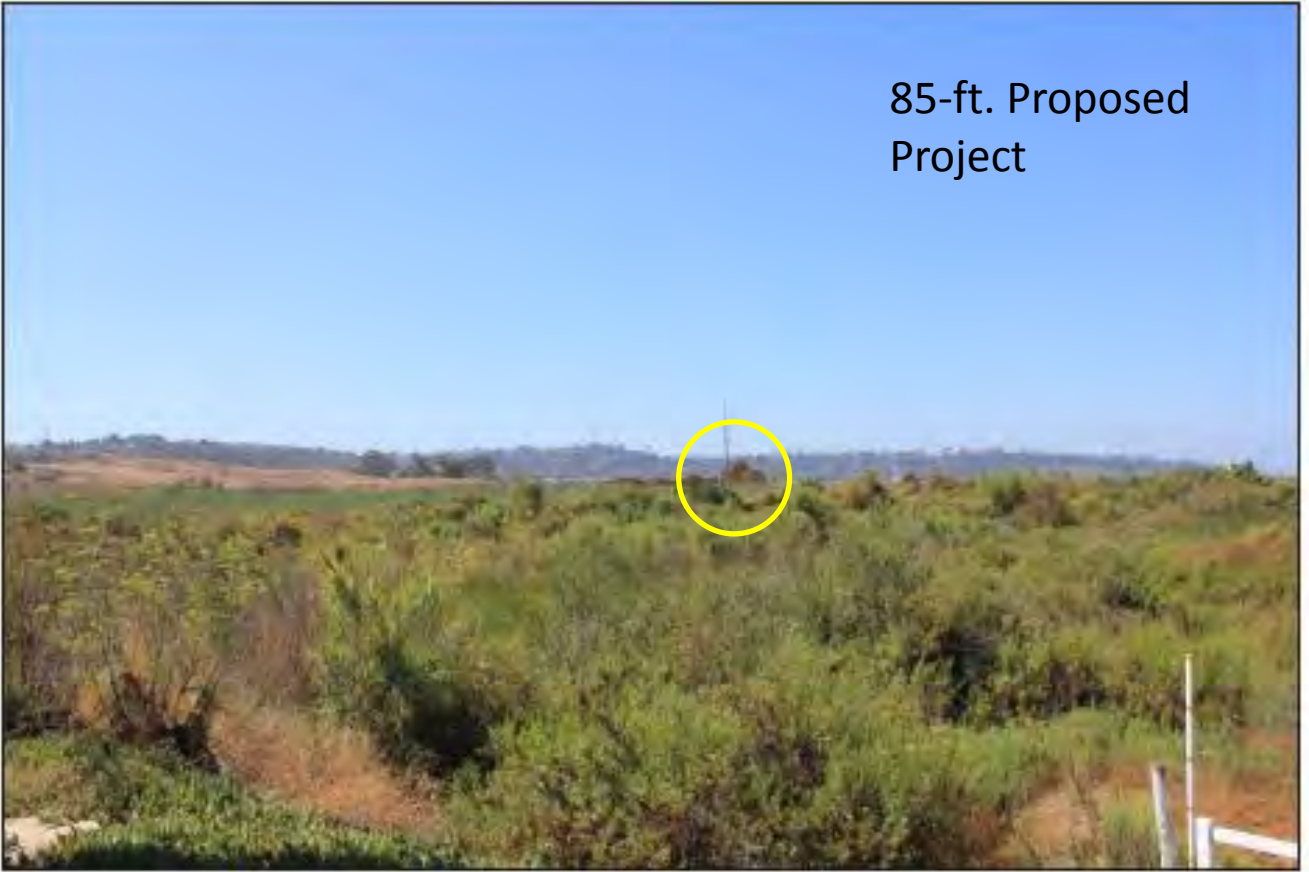
45-ft. “Reduced
Height Alternative”



VISUAL SIMULATION—From Future Visitor Center

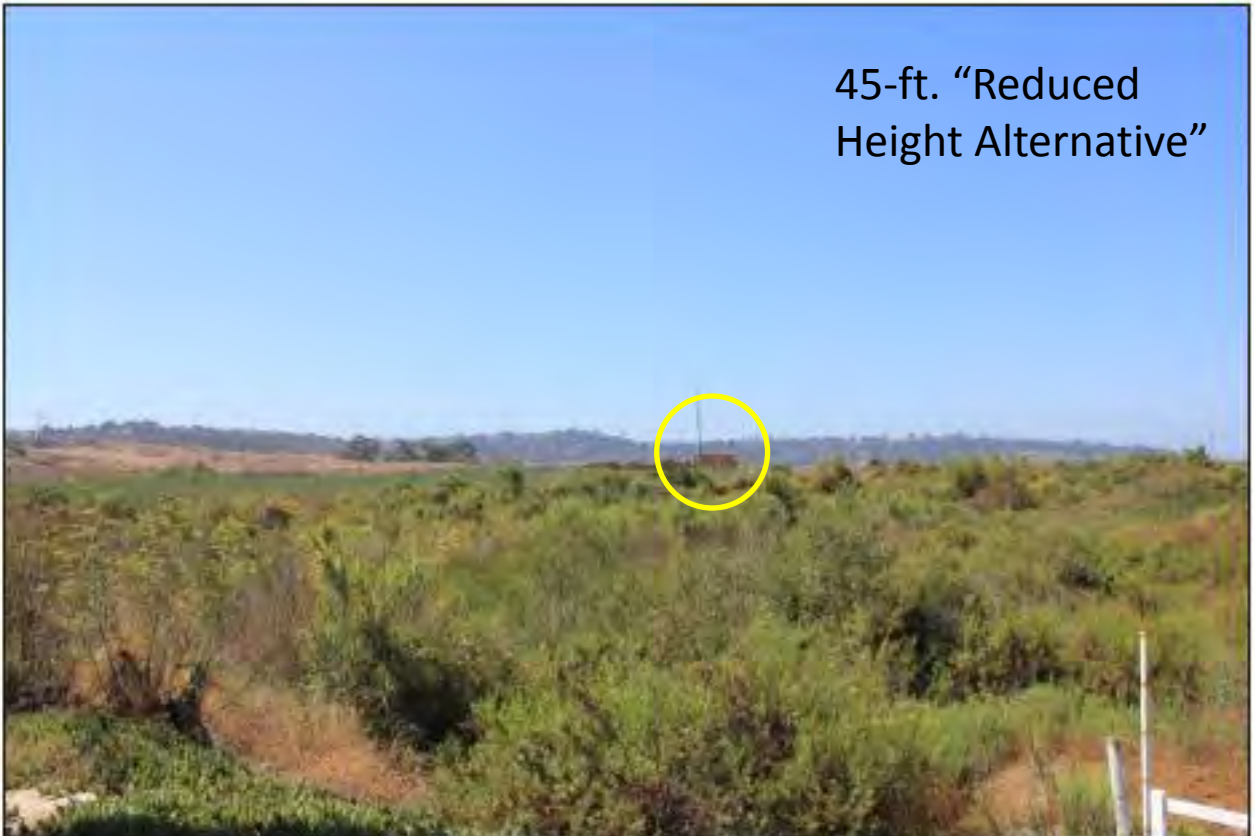
Viewpoint 3

85-ft. Proposed
Project



VISUAL SIMULATION—From Future Horse Park Trail at El Camino Real

45-ft. “Reduced
Height Alternative”



VISUAL SIMULATION—From Future Horse Park Trail at El Camino Real

Viewpoint 4



VISUAL SIMULATION—From El Camino Real Undercrossing (new road configuration not visible)



VISUAL SIMULATION—From El Camino Real Undercrossing (new road configuration not visible)

Viewpoint 5

85-ft. Proposed
Project



45-ft. "Reduced
Height Alternative"



VISUAL SIMULATION—From Stallion Crossing Edge

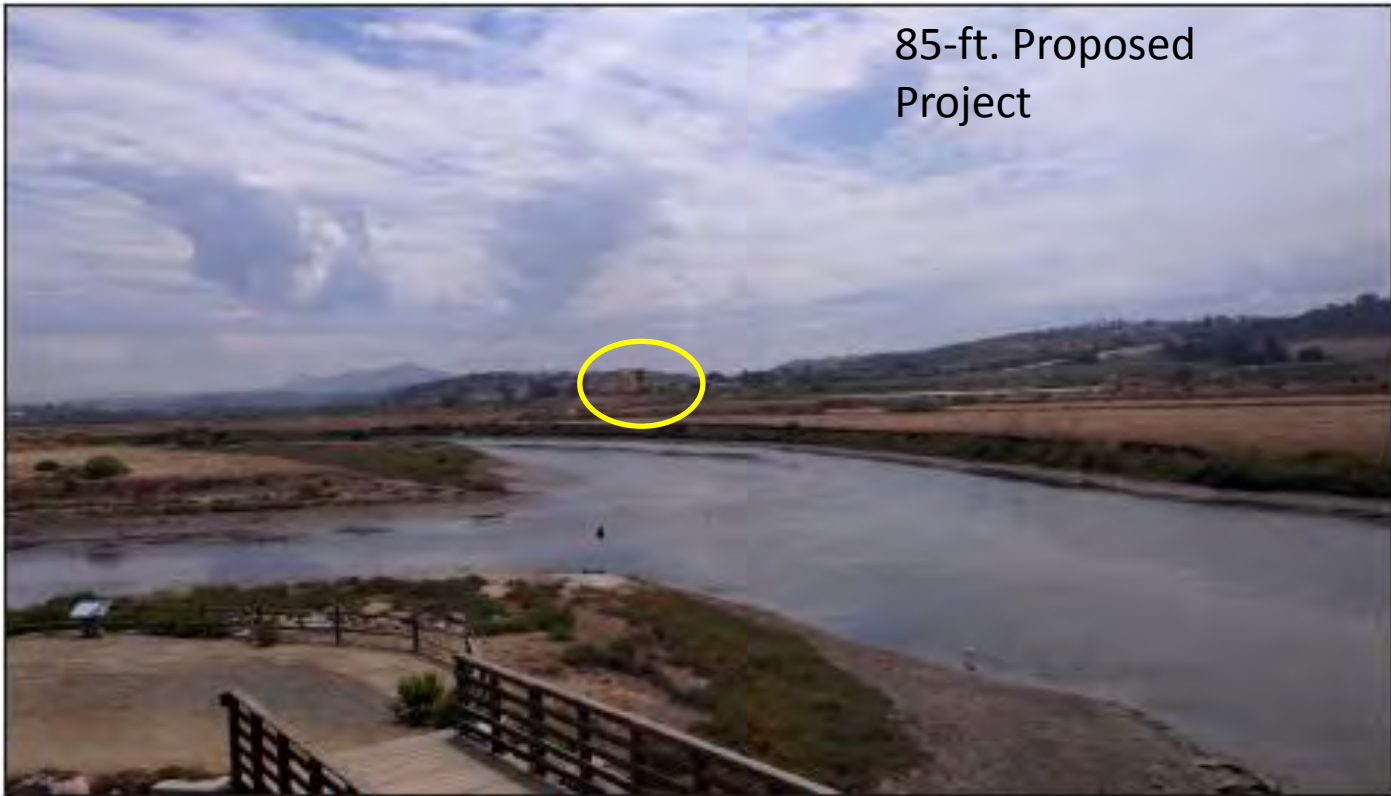
Viewpoint 6



VISUAL SIMULATION—From North Bound El Camino Real



Viewpoint 7



85-ft. Proposed
Project

VISUAL SIMULATION – Proposed Project from I-5 NB



45-ft. "Reduced
Height Alternative"

VISUAL SIMULATION – Reduced Height Alternative from from I-5 NB

Viewpoint 8

85-ft. Proposed
Project



VISUAL SIMULATION – Proposed Project from I-5 NB

45-ft. “Reduced
Height Alternative”



VISUAL SIMULATION – Reduced Height Alternative from I-5 NB

Viewpoint 9

85-ft. Proposed
Project



VISUAL SIMULATION – Proposed Project from Overlook Park

45-ft. “Reduced
Height Alternative”



VISUAL SIMULATION – Reduced Height Alternative from Overlook Park

Viewpoint 10



*VISUAL SIMULATION
Proposed Project and Reduced Height Alternative from Old El Camino Real*

Viewpoint 11

85-ft. Proposed
Project



VISUAL SIMULATION – Proposed Project from Coast to Crest Trail

45-ft. “Reduced
Height Alternative”



VISUAL SIMULATION – Reduced Height Alternative from Coast to Crest Trail

Viewpoint 12

85-ft. Proposed
Project



VISUAL SIMULATION – Proposed Project from Dust Devil Nature Trail

45-ft. “Reduced
Height Alternative”



VISUAL SIMULATION – Reduced Height Alternative from Dust Devil Nature Trail

RECEIVED

DEC 09 2015

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

ST. JOHN GARABED ARMENIAN CHURCH
REDESIGN REQUESTED BY COASTAL COMMISSION STAFF

Coastal staff intends to recommend approval with both of these modifications.

1. Reduce the total height of the church to 58' (including cross) as follows:
 - a. Lowest roof line: keep at 30'
 - b. Upper roof line: reduce from 50' to 40'
 - c. Top of dome: reduce from 85' to 50'
2. Reconfigure the site to better screen the tall element of the church by moving it to the location of the youth center, and moving the shorter buildings to the north.

RESPONSE TO REQUEST FOR REDESIGN

Reduced Church Height:

1. The geometry created by limiting the roof lines to 30', 40' and 50' to top of dome is inconsistent with Armenian Church tradition.
2. The volume of the interior space would not be consistent with Armenian Church tradition, and would diminish the acoustics of the sanctuary.
3. The proposed change to the roof lines will make little or no difference to the visual impact of the project as was demonstrated in the alternative visual simulations.
4. At the proposed heights the building will not look like a church.

Reconfigured Site:

1. If the Church was moved to the southwest corner (the current site of the Youth Building), the City would not allow a 58' structure because of insufficient setbacks.
2. By placing the Church to the South adjacent to the proposed Parking area of the Formosan church the screening by the church from that development is not available.
3. We would need a setback deviation or a redesign (with loss of parking) as the Church would not fit in the space for the Youth Building.
4. The Memorial Plaza and Prayer Garden are associated with the Church and would not fit, nor be compatible, near the Youth Building
5. The open space between the Youth Building and Education Building is intended to be an active space to be shared with those uses. Moving the Youth building would eliminate that adjacency and put an active social space near the Church.
6. By putting the Youth Building closest to the San Dieguito River Valley and setting the Church in the back, we would be placing a square, subordinate building at the most prominent position and making the Church hard to find. You may not be able to see the Church when entering the site, especially at the heights being requested.
7. ~~As the Youth building is at a higher elevation than the Church, the Church will appear higher, if moved, as there is no ability to build it into the grade as is proposed for the Youth Building.~~
8. The Stallion's Crossing development to the south supported the project because the Church was furthest from their home.

EXHIBIT NO. 19

APPLICATION NO.

6-15-0142

Applicant Response to

Special Condition 1



California Coastal Commission

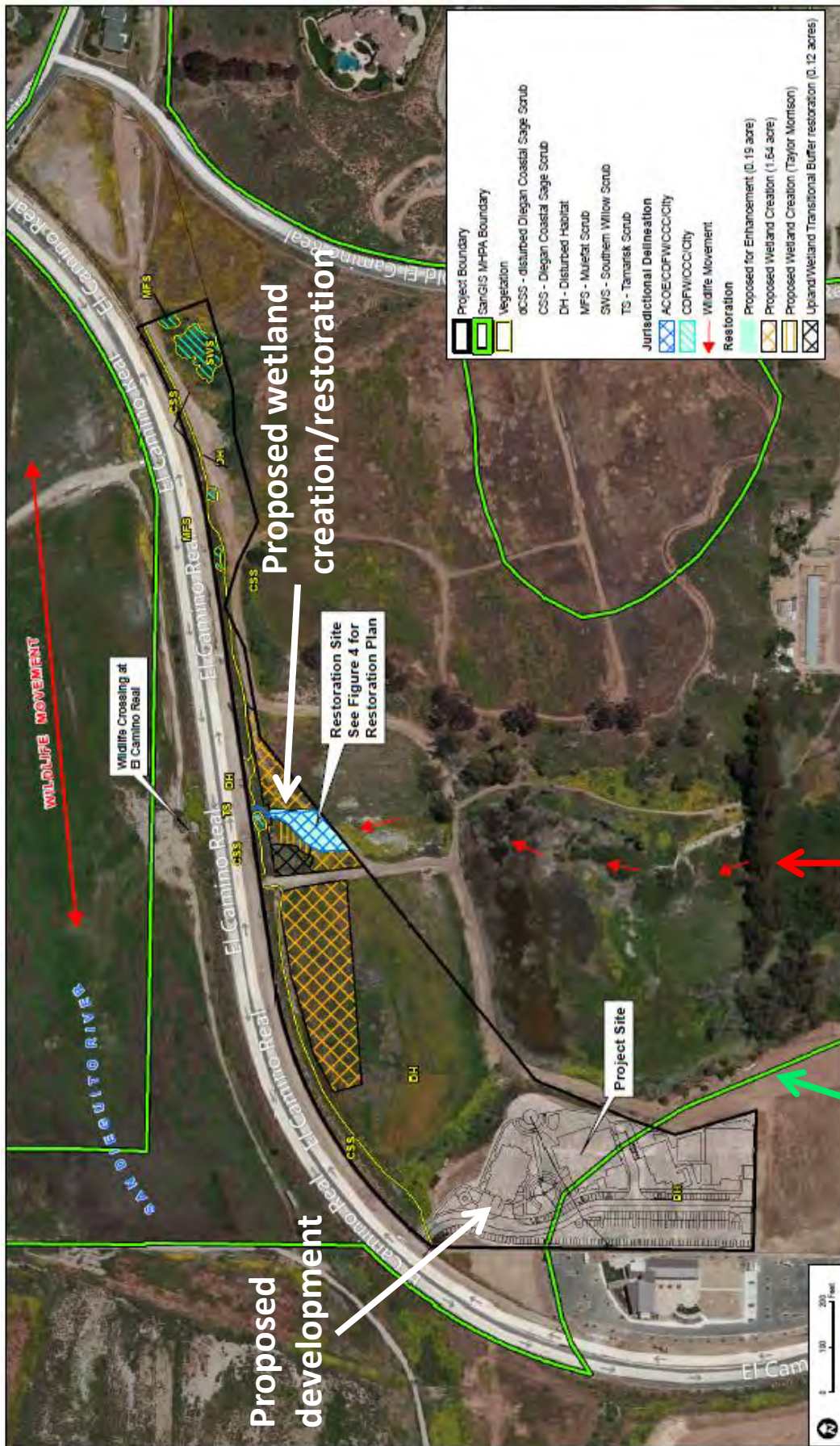


FIGURE 3
Project Site Map

Restoration Plan for the St. John Gas and Oil Church Project

EXHIBIT NO. 20

APPLICATION NO.

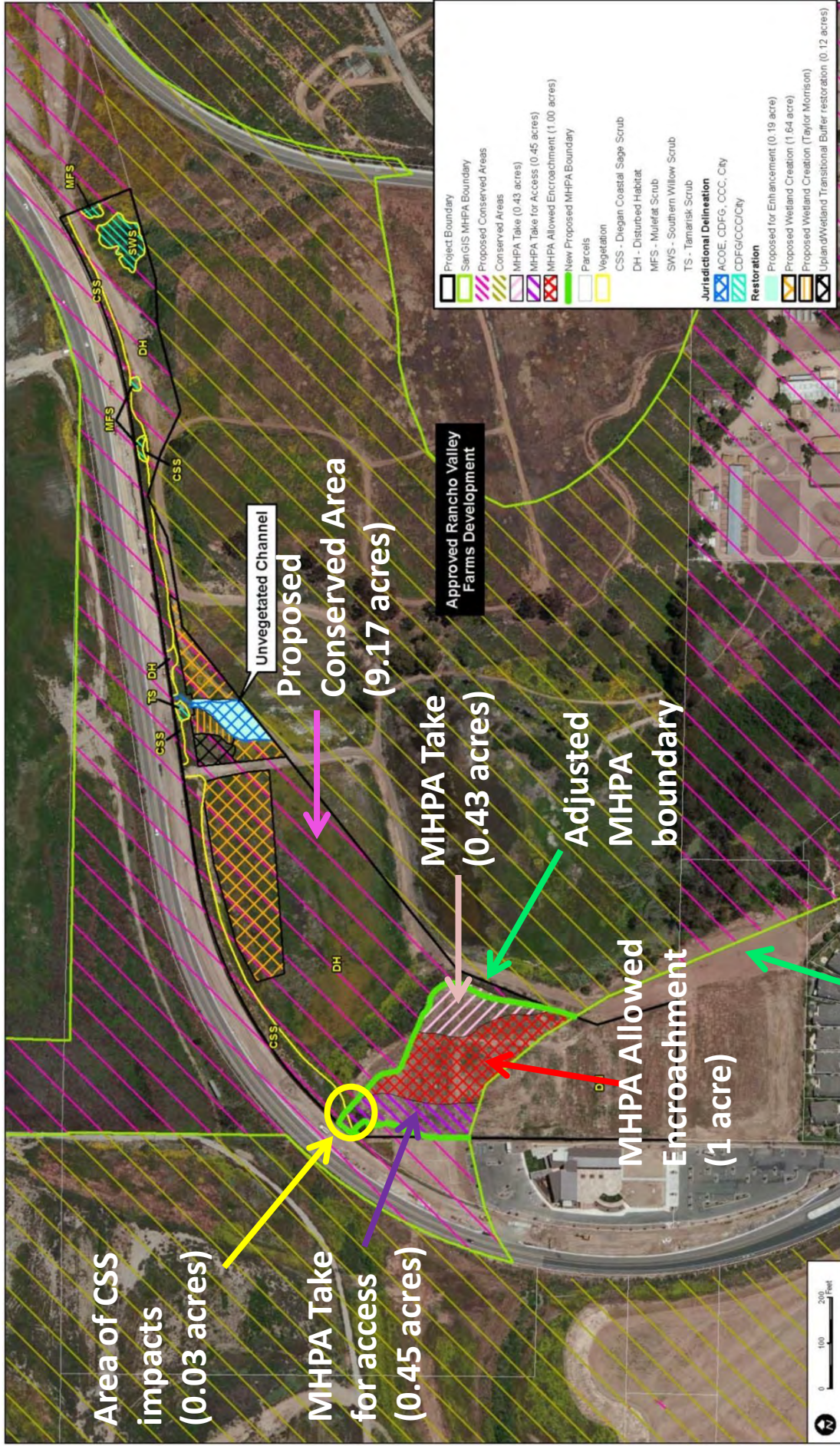
6-15-0142

Biological Resources

Map



California Coastal Commission



20% Big Maps

RESOURCES TECHNICAL REPORT FOR ST. JOHN GARABED CHURCH PROJECT

FIGURE 6

Proposed Boundary Adjustment and Restoration for Compensation

**Original
MHPA
boundary**

EXHIBIT NO. 21

APPLICATION NO.

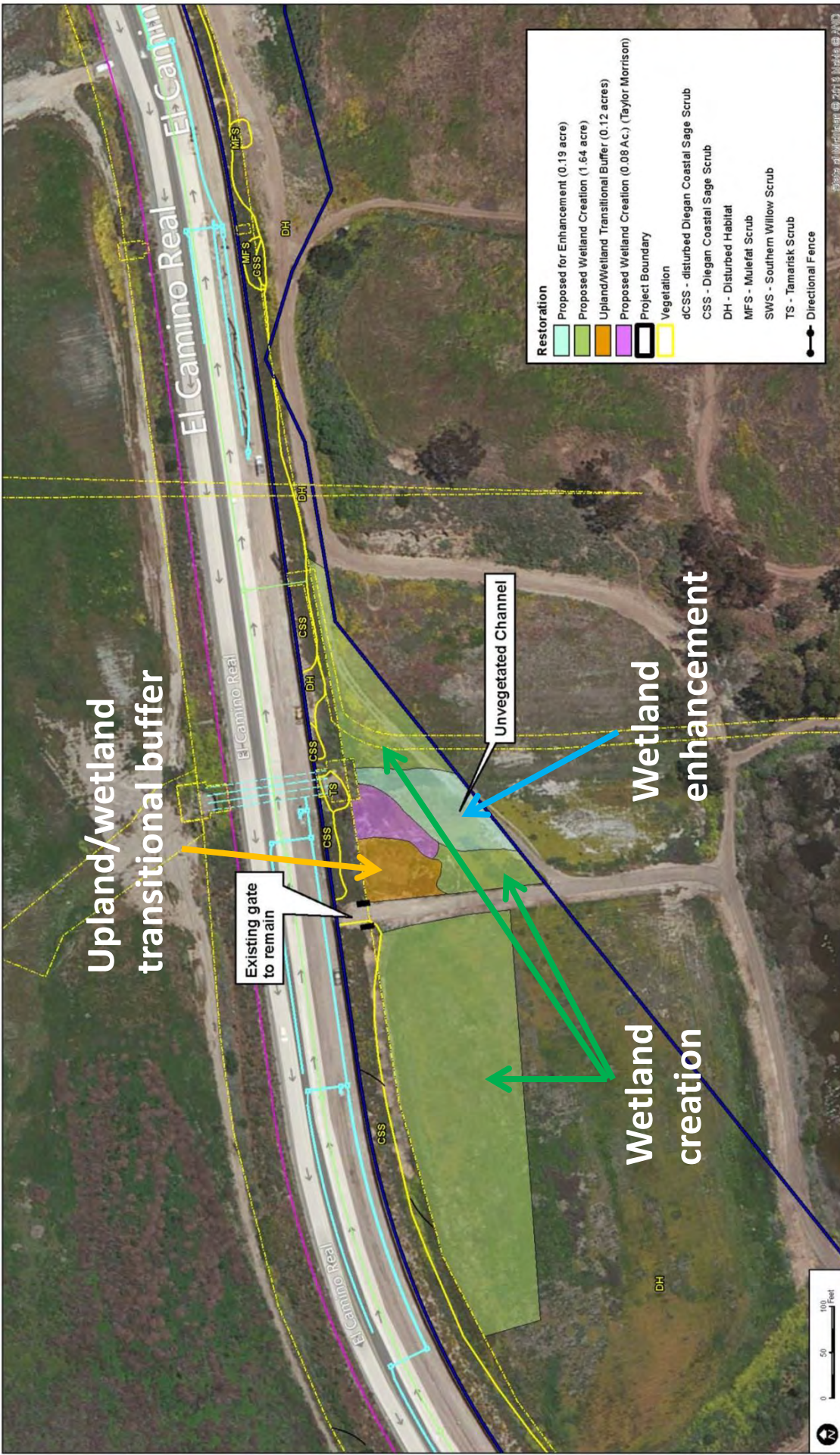
6-15-0142

MHPA Take and

Boundary Correction



California Coastal Commission



Restoration	
[Light Green Box]	Proposed for Enhancement (0.19 acre)
[Medium Green Box]	Proposed Wetland Creation (1.64 acre)
[Orange Box]	Upland/Wetland Transitional Buffer (0.12 acres)
[Purple Box]	Project Boundary
[Black Box]	Vegetation
[Yellow Box]	dCSS - disturbed Diegan Coastal Sage Scrub
[Green Box]	CSS - Diegan Coastal Sage Scrub
[Light Green Box]	DH - Disturbed Habitat
[Orange Box]	MFS - Mulefat Scrub
[Purple Box]	SWS - Southern Willow Scrub
[Blue Box]	TS - Tamarisk Scrub
[Black Line]	Directional Fence

FIGURE 4
Restoration Plan

Restoration Plan for the St. John Garabed Church Project

0 50 100 Feet

EXHIBIT NO. 22	
APPLICATION NO. 6-15-0142	
Proposed Wetland	
Restoration Plan	
	California Coastal Commission

EX PARTE COMMUNICATION DISCLOSURE FORM

Filed by Commissioner: Greg Cox

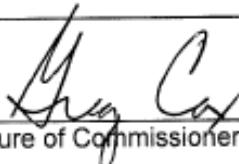
- 1) Name or description of project: St. John Garabed Armenian Church
- 2) Date and time of receipt of communication: September 25, 2015 at 9:30 AM
- 3) Location of communication: Project Site, 13925 El Camino Real, San Diego, CA
(If not in person, include the means of communication, e.g., telephone, e-mail, etc.)
- 4) Identity of person(s) initiating communication: Joe Kellejian
- 5) Identity of person(s) on whose behalf communication was made: St. John Garabed Armenian Church Trust Committee
- 6) Identity of persons(s) receiving communication: Greg Cox and Greg Murphy
- 7) Identity of all person(s) present during the communication: Harry Krikorian, Joe Kellejian, Marcela Escobar-Eck and Kathi Riser

Complete, comprehensive description of communication content (attach complete set of any text or graphic material presented):

Reviewed the history of project processing with City of San Diego, state and federal resource agencies and Coastal staff. Reviewed the materials contained in a binder that is also being provided to Coastal staff, including communication between applicant and staff, visual simulations, project graphics, history of Armenian Church architecture, excerpts from City of San Diego EIR, etc.
Reviewed staff's request for project changes to church height and site configuration.

9/25/2015

Date


Signature of Commissioner

TIMING FOR FILING OF DISCLOSURE FORM: File this form with the Executive Director within seven (7) days of the ex parte communication, if the communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication. If the communication occurred within seven (7) days of the hearing, provide the information orally on the record of the proceeding and provide the Executive Director with a copy of any written material that was part of the communication. This form may be filed with the Executive Director in addition to the oral disclosure.

EXHIBIT NO. 23

APPLICATION NO.

6-15-0142

Ex Partes



California Coastal Commission

EX PARTE COMMUNICATION DISCLOSURE FORM

Filed by Commissioner: Greg Cox

1) Name or description of project: St. John Garabed Armenian Church

2) Date and time of receipt of communication: August 31, 2015 at 10:00 AM

3) Location of communication: San Diego

(If not in person, include the means of communication, e.g., telephone, e-mail, etc.)

4) Identity of person(s) initiating communication: Kathi Riser

5) Identity of person(s) on whose behalf communication was made: _____

St. John Garabed Armenian Church Trust Committee

6) Identity of persons(s) receiving communication: Greg Murphy, for Greg Cox

7) Identity of all person(s) present during the communication: _____

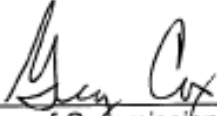
Marcela Escobar-Eck and Kathi Riser

Complete, comprehensive description of communication content (attach complete set of any text or graphic material presented):

Reviewed the history of project processing with City of San Diego, state and federal
resource agencies and Coastal staff. Reviewed the materials contained in a binder
that is also being provided to Coastal staff, including communication between
applicant and staff, visual simulations, project graphics, history of Armenian
Church architecture, excerpts from City of San Diego EIR, etc.

9/1/2015

Date


Signature of Commissioner

TIMING FOR FILING OF DISCLOSURE FORM: File this form with the Executive Director within seven (7) days of the ex parte communication, if the communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication. If the communication occurred within seven (7) days of the hearing, provide the information orally on the record of the proceeding and provide the Executive Director with a copy of any written material that was part of the communication. This form may be filed with the Executive Director in addition to the oral disclosure.

Letter of Transmittal

Date: 1/06/16

RE: St. John Garabed Church – Application No. 6-15-0124

To:

Lisa Schlembach
California Coastal Commission, San Diego Area
7575 Metropolitan Drive, Ste. 103
San Diego, CA 92108-4421

From:

Tyler Sherer
Atlantis Group
2488 Historic Decatur Road, Suite 200
San Diego, CA 92016

ATTACHED PLEASE FIND:

Information regarding Ex Parte Communications to Coastal Commissioners in advance of the January 14 hearing for St. John Garabed Church (App. No. 6-15-0142).

The attached power point was provided to Commissioners Bochco and Groom on January 5, 2016, in advance of future discussions regarding the project, and will be provided to additional commissioners in the future.

Please note that this information is in addition to the briefing binder already provide to staff in August 2015.

Please let me know if you have any questions, or need further information.

Sincerely,

Tyler Sherer
Policy Consultant



ATLANTIS GROUP
2488 Historic Decatur Road, Suite 200
San Diego, California 92106
(619) 523-1930

EXHIBIT NO. 24

APPLICATION NO.

6-15-0142

Applicant's Commission



Briefing Book

California Coastal Commission

St. John Garabed Church Project

Planning Commission – October 30, 2014
Unanimous Approval



ST. JOHN GARABED – VICINITY MAP

Site = 13.4 Acres
Preserved = 9.18 Acres
Developed = 4.23 Acres

PROJECT SITE

Evangelical
Fornosan
Church
of
San
Diego

Stallion's
Crossing
Residential
Development

Rancho Valley Farms
Vesting Tentative Map

Rancho El Camino
Equestrian Center

Ridgemar
Equestrian Center

Fairbanks
Country
Club

SAN DIEGUITO
RD

OLD EL CAMINO REAL

EL CAMINO REAL

0 200 400
FEET

ST. JOHN GARABED – VICINITY MAP

9.18 Acres Preserved and Restored

PROJECT SITE

Evangelical Fomhosan Church of San Diego

Stallion's Crossing Residential Development

Rancho El Camino Real

Ridgemark Equestrian Center

Rancho Valley Farms Testing Tentative Map

SAN DIEGUITO RD

OLD EL CAMINO REAL

0 200 400 FEET

3



PROJECT SITE

**Evangelical
Formosan
Church
of
San
Diego**

Stallion's Crossing Residential Development

**Rancho Valley Farms
Resting Tentative Map**

**Rancho El Camino
Equestrian Center**

**Ridgemar
Equestrian Center**

SAN DIEGUITO RD



ed
University
Club



Aerial Photo and Rendering



Project Scope

- **A multi-phase project to include a 350 seat Church with the following accessory uses**
 - **A 500-seat multi-purpose hall**
 - **A Cultural and Education Center with classrooms for religious instruction**
 - **A Youth Center with youth recreational facilities**



Images



ARMENIAN CHURCH IMAGES

9-26-2012

ST. JOHN GARABED ARMENIAN CHURCH

HYNDMAN & HYNDMAN architecture



Armenian Churches

Churches of Historic Armenia:

A Legacy to the World

An exhibition of color photographs by Richard A.
Elbrecht and Anne Elizabeth Elbrecht,
presented by the Armenian Studies Program,
California State University, Fresno.

Mount Ararat



Mount Ararat, overlooking a Kurdish village by the town of Dogubayazit.

Image 32 of 157

Mount Ararat, overlooking a Kurdish village near the town of Doğubayazit, located about 150 kilometers southeast of Ani, looking northeast. (August 13, 1991 - A13:4.)



Farms, flocks and stream by the town of Dogubayazit below Mount Ararat.

Image 31 of 157

Farmland, flocks and stream near the town of Doğubayazit below Mount Ararat in the heartland of medieval Armenia, looking west. (August 13, 1991 - A12:7.)

Kars Province and Lake Van



Kars Province



Cathedral of Sub Arakelots (Holy Apostles).
Image 1 of 167

Cathedral of Sub Arakelots (Holy Apostles), in the medieval Armenian city of Kars, looking southeast toward the cathedral's north (left) and west (right) facades (10th Century). (August 15, 1991 - A15:4.)



Armenian Church of Surb Khach (Holy Cross), on Aght'amar Island in Lake Van.

Image 42 of 157

Armenian Church of Surb Khach (Holy Cross), on Aght'amar Island in Lake Van, looking southeast toward the church, the lake and the Çadır (Kurdish) Mountains (10th Century). (July 15, 1987 - K(35)-8:18.)



Church of the Armenian Monastery of Dprevank.
Image 3 of 167

Church of the Armenian Monastery of Dprevank, in the village of Yağkesen (near the town of Başgedikler), looking southwest toward its north (right) and east (left) facades (10th Century?). (August 15, 1991 - A16:7.)



In addition to the church and cultural center, a memorial will be erected in memory of the Armenians who lost their lives simply because they were Armenian.



PROJECT SITE



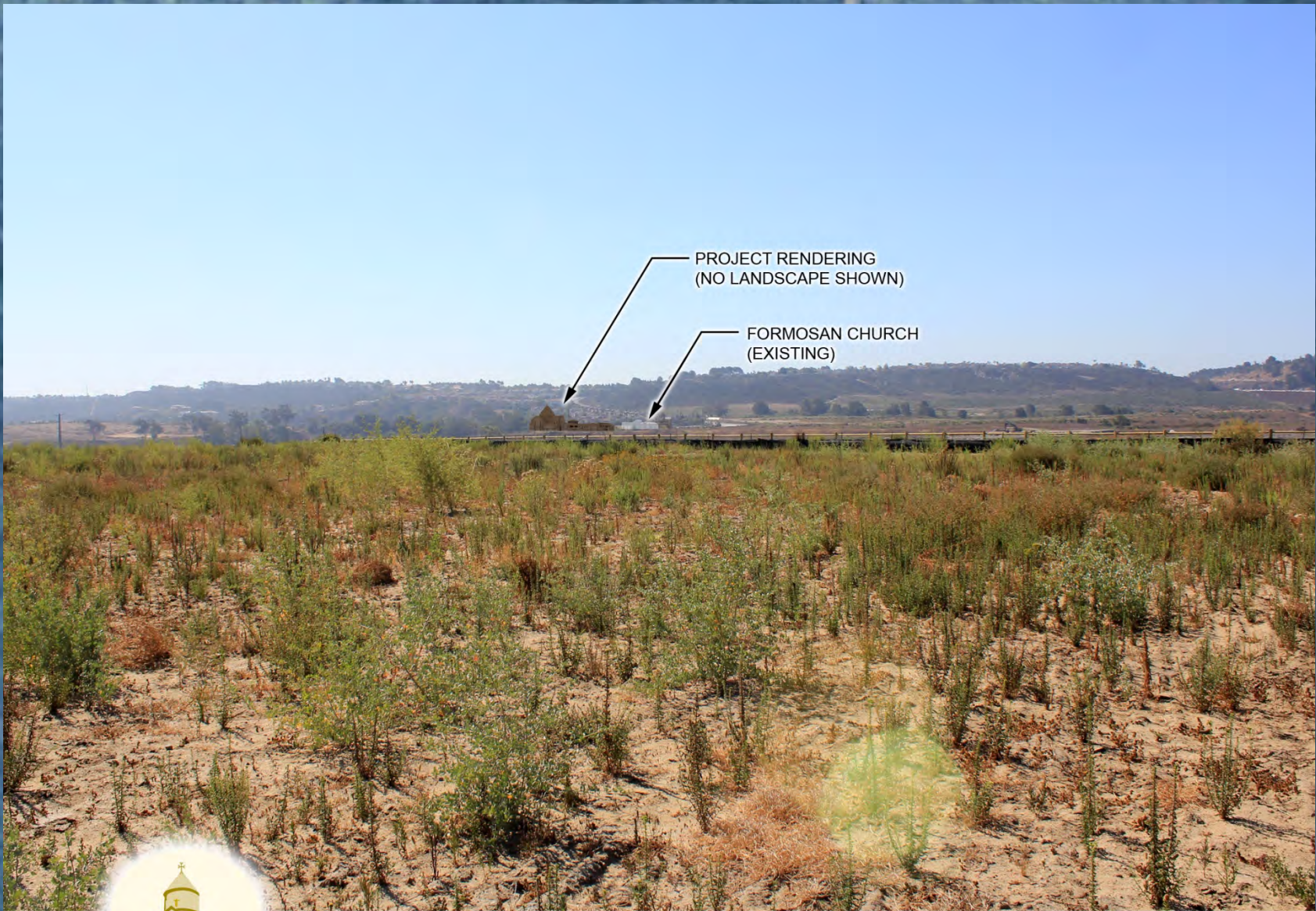
SITE PHOTO 1 - FROM LAGOON TRAIL @ VIA DE LA VALLE EXIT

9-26-2012

ST. JOHN GARABED ARMENIAN CHURCH

HYNDMAN & HYNDMAN architecture





SITE PHOTO 2 - VISUAL SIM (FROM FUTURE VISITOR CENTER)

9-26-2012

ST. JOHN GARABED ARMENIAN CHURCH

HYNDMAN & HYNDMAN





PROJECT SITE



SITE PHOTO 3 - FROM FUTURE HORSE PARK TRAIL @ EL CAMINO REAL

9-26-2012

ST. JOHN GARABED ARMENIAN CHURCH

HYNDMAN & HYNDMAN architecture

3



PROJECT RENDERING
(NO LANDSCAPE SHOWN)



SITE PHOTO 4 - VISUAL SIM (FROM EL CAMINO REAL UNDER CROSSING)

9-26-2012

ST. JOHN GARABED ARMENIAN CHURCH

HYNDMAN & HYNDMAN architecture





PROJECT SITE



SITE PHOTO 5 - FROM ACCESS ROAD

9-26-2012

ST. JOHN GARABED ARMENIAN CHURCH



Report a problem



SITE PHOTO 6 - VISUAL SIM (FROM NORTH BOUND EL CAMINO REAL)

9-26-2012

ST. JOHN GARABED ARMENIAN CHURCH

HYNDMAN & HYNDMAN architecture 6



SITE PHOTO 7 – FROM EAST OF I-5



PROJECT SITE

SITE PHOTO 8A – FROM WEST OF I-5



PROJECT SITE

SITE PHOTO 8B – FROM I-5



PROJECT SITE

SITE PHOTO 9 – FROM HIGH BLUFF DRIVE



PROJECT SITE

SITE PHOTO 10 – FROM OLD EL CAMINO REAL



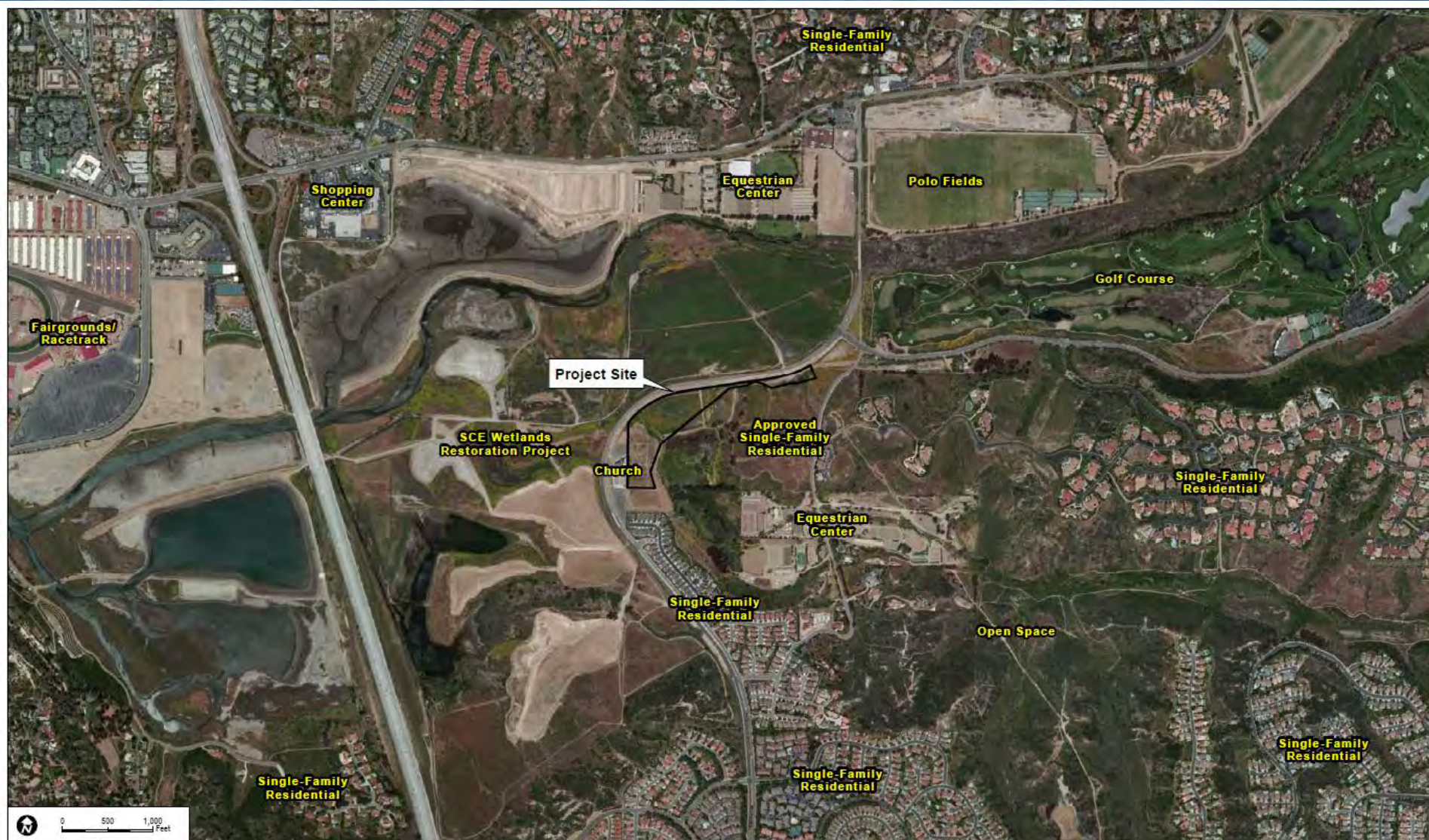
PROJECT SITE

SITE PHOTO 11 – FROM WEST OF SHOWPARK

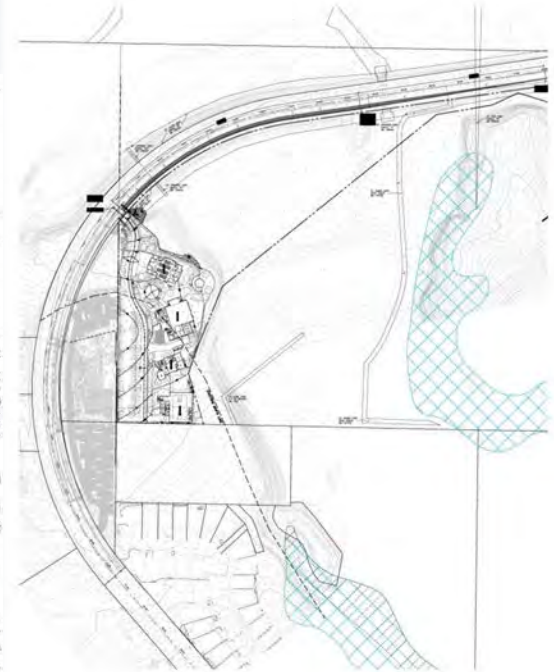
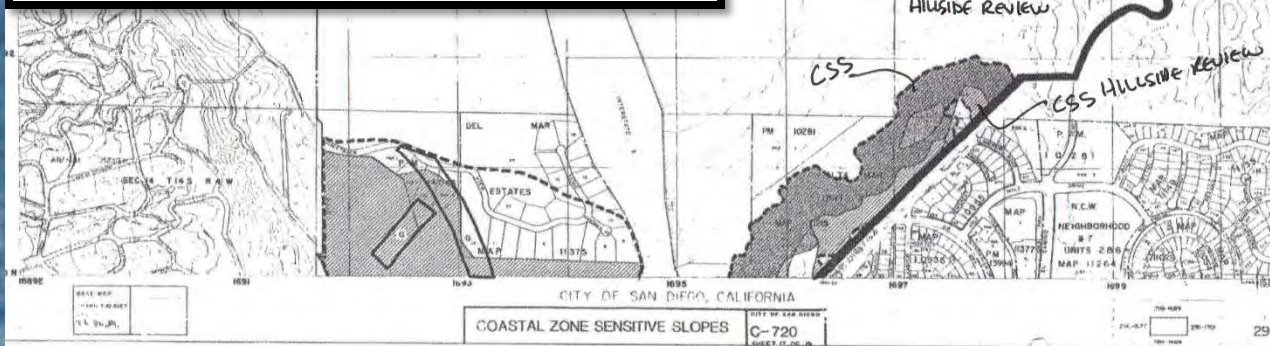
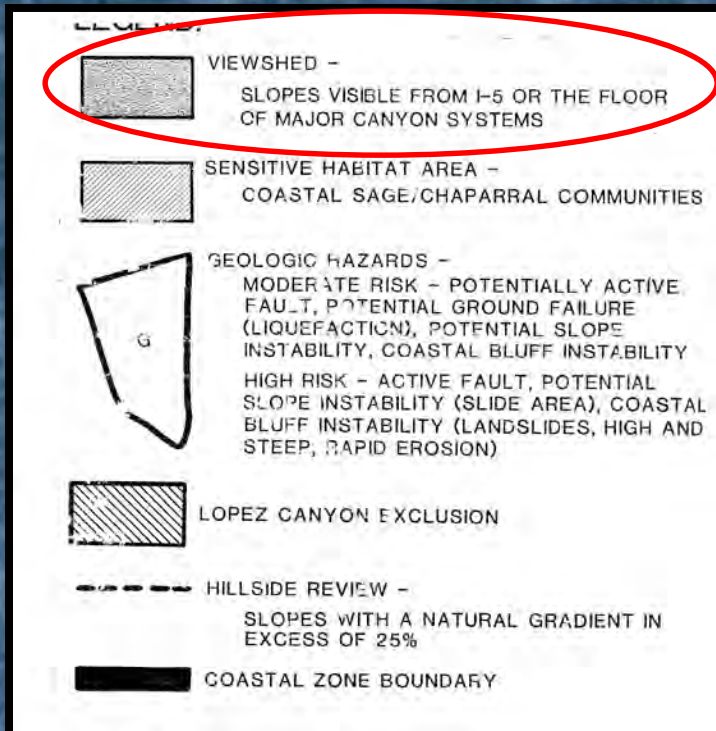


SITE PHOTO 12 – FROM WEST OF EL CAMINO REAL

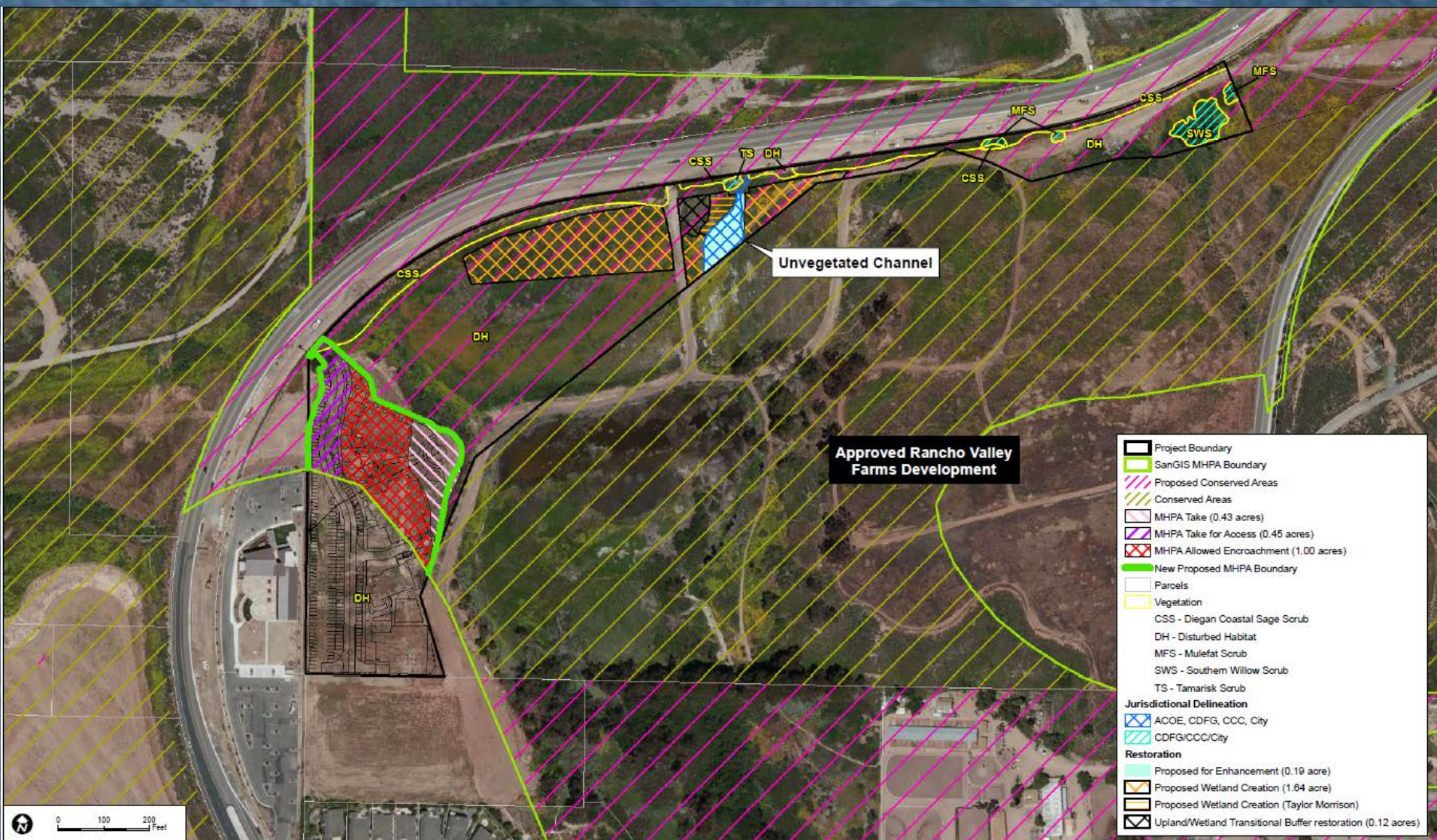
Existing Land Uses

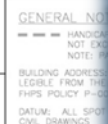


C-720 Coastal Zone Sensitive Slopes Viewsheds and Sensitive Habitat (none on-site)

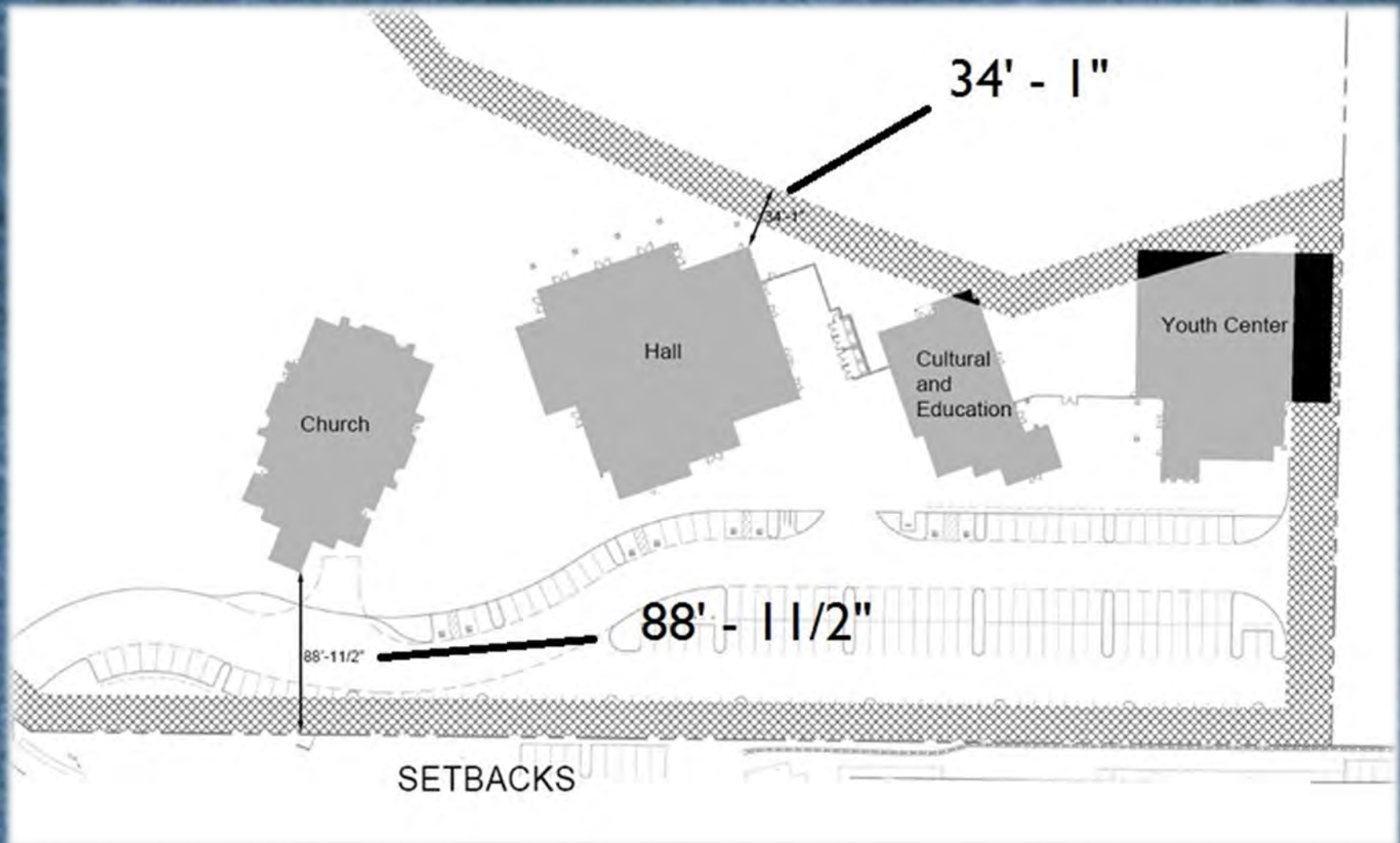


Proposed Boundary Adjustment (Preserving and Enhancing Habitat and Wildlife corridors)

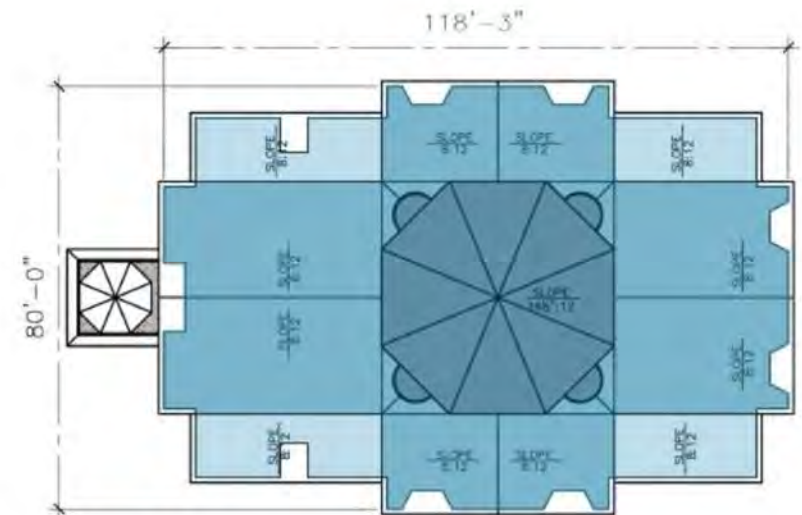




Setbacks



Elevation



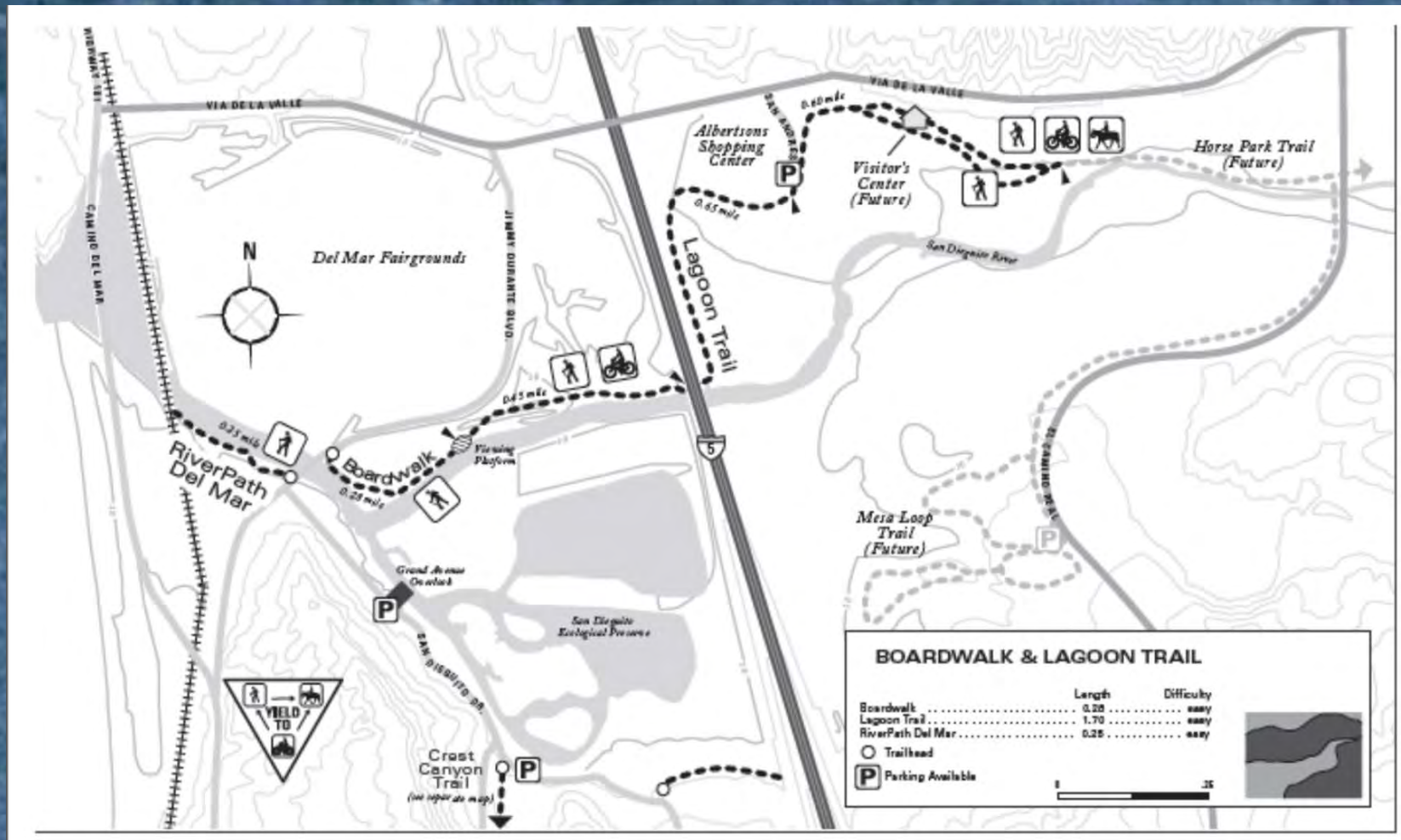
Below 30 ft 1,424 SF (18%)

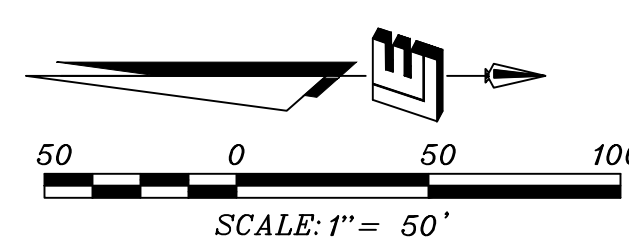
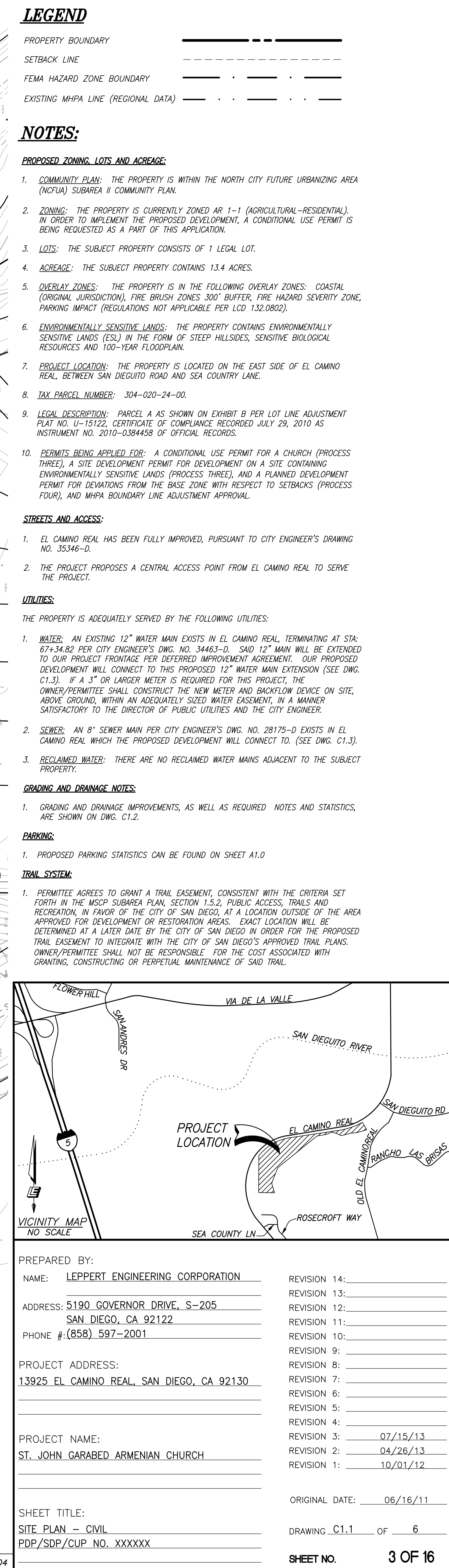
30-50 ft 4,805 SF (60.5%)

Above 50 ft 1,718 SF (21.5%)

Total Building Area (Not including Porch): 7,947 SF (100%)

Boardwalk and Lagoon Trail Map





Congress of the United States
House of Representatives
Washington, DC 20515-0552

January 11, 2016

Mr. Steve Kinsey, Chairman
California Coastal Commission
c/o Ms. Lisa Schlembach, Coastal Program Analyst
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108

RE: St. John Garabed Armenian Church Project (Coastal Application 6-15-0142)

Dear Chairman Kinsey and Commissioners:

I am writing in support of the St. John Garabed Armenian Church project (Coastal Application 6-15-0142), including the height and configuration elements that were submitted to the Coastal Commission.

The St. John church is a welcomed addition to the community having already received support from the Carmel Valley Community Planning Group (September 26, 2014) and unanimous approval from the City of San Diego Planning Commission (October 30, 2014). The church will be a destination for Armenians, historians and the general public throughout the San Diego region; it will be recognized as a landmark building that honors the traditional design and architecture of the Armenian church.

The dome and proposed height of the St. John's church is integral to preserving the historic and religious integrity of the church. The top of the church, consisting of the dome and cross, has substantially less bulk than its base, thus reducing the overall visual impact. The renderings and visual simulations of the church indicate there is visibility from all viewpoints except immediately adjacent, and no ocean view or scenic corridors are impacted.

Located in the front of the property are the Memorial Plaza and Prayer Garden; an extension of the church that is designed to be viewed by both congregants and visitors. Reconfiguring the property, as recommended in the staff report, will disassociate the plaza and garden from the church building. This design is also incompatible with the youth center. Furthermore, if the church is relocated to the southwest corner, the City of San Diego will not allow the structure due to insufficient setbacks.

The St. John Garabed Church project has affirmed their commitment to the community by dedicating nine (9) acres of wildlife preservation, maintaining the proposed trails along the property's perimeter, and negating any visual impacts on ocean views and scenic corridors. The church's outreach, and its willingness to open its doors to the public for events and recreation is reflected in the board community support for the project.

EXHIBIT NO. 26

APPLICATION NO.

6-15-0142

Letters of Support



California Coastal Commission

I encourage the Commission to support the St. John Garabed Church project. Please do not hesitate to contact me should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Scott Peters", with a stylized, flowing script.

Scott Peters
Member of Congress
US House of Representatives
California, 52nd District

Faith in
Our Future

St. John Garabed
Armenian Church
of San Diego
TRUST FUND COMMITTEE



Community Unity
Initiative

January 11, 2016

Th17a

Archpriest Fr. Datev Tatoulian

**PARISH PRIEST &
PRESIDENT**

TRUST COMMITTEE

Harry Krikorian, Chairman
Richard Manoogian, Vice Chairman
Beth Broussalian, Secretary
Gary Takessian, Treasurer
Richard Avakian, Member
Kathy Kassardjian, Member
Noubar Markarian, Member
Alan Yaghdjian, Member

ADVISORS

Steven Kradjian
Jim Sahagian

Dr. Charles Lester, Executive Director
Honorable Chairman Steve Kinsey and Commissioners
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RE: St. John Garabed Church, App-6-15-0142

Dear Honorable Chairman Kinsey and Commissioners,

My name is Harry Krikorian and I represent St. John Garabed Armenian Apostolic Church as chairman of the trust (the "Applicant"). On behalf of our congregation and the entire Armenian community, I am pleased to write this letter in support of our proposed church facility on El Camino Real in the deferred certification area of the City of San Diego's North City Future Urbanizing Area, Subarea II.

The Armenian community of San Diego is a growing and active congregation. A few families established our San Diego church approximately 35-years ago when they purchased an existing synagogue in downtown San Diego and converted it to our use. At that time it was our dream to build a new Church in the tradition of our Christian heritage dating back more than 1700-years. We have outgrown our present Church which has insufficient parking and is no longer conducive to meeting the needs of our growing community. We began an intense search over 10-years ago to find the best possible location for a new Church which would meet our growing demographics and allow us the opportunity to finally have our own iconic Armenian Church with auxiliary buildings to serve the needs of our community. The proposed site location fulfilled all of our dreams being situated near a river valley, sitting on a mesa reminiscent of a thousand Churches built throughout the centuries in Armenia. This land was our dream come true. It was an opportunity for all Armenians to congregate in one location to worship, socialize, receive Christian and language education, to celebrate feast days and other events, and to honor our martyrs and victims of a genocide which occurred 100-years

4473 30th Street
San Diego, CA 92116-4232
Tel: (619) 284-7179
Email: sjgsdtrust@gmail.com
www.stjohngarabedtrust.org

ago when 1,500,000 Armenians were horrifically slaughtered by Ottoman Turks. Our campus proposes to build a Church, social hall, classrooms, youth facility, and a memorial plaza which we expect will be widely visited by travelers and visitors to San Diego as well as academics who desire to study history of this period.

This land along the San Dieguito River Valley affords a beautiful setting and while not obstructing any views. It will be a wonderful asset to San Diego and the Carmel Valley area. In Armenia today, thousands of visitors annually visit three such Churches designated as **UNESCO World Heritage sites**.

In religious history, it is widely known that Armenia was the first nation to adopt Christianity as a state religion in 301AD. It was St. Gregory the illuminator who in the 4th century was awakened from sleep and witnessed the presence of our Lord Jesus Christ descending from above then striking the earth with a golden hammer declaring this was to be the site of the Armenian Church. The Church was to be built with the alter facing to the east. The length and width determined by the number of worshippers (in our case-350) and the height must be equal to or greater than the length. Finally there was to be a dome sitting as a crown upon the Church with reverence to the majestic Mt. Ararat. The place, the bible tells us, where Noah's Ark came to rest. Throughout the centuries these architectural elements have been strictly adhered to. Historians have recorded and credited Armenian architects with designing and building the Churches such that the Dome could be supported by two intersecting arches eliminating the need of any columnar supports (see attached discussion). While our property is perfectly situated to our needs, it had many constraints which had to be considered. In complete cooperation with all the various stakeholders and an intense desire to preserve the ecological and environmental integrity of the land, we worked tirelessly to achieve a perfect balance of meeting the needs of our Church with those of all stakeholders in the land. This is supported by the comments and unanimous decision of the planning commission when approving our conditional use permit.

For the past 8-years, guided by our faith and working in cooperation with the local community and City of San Diego, we are able to present a plan which satisfies and respects the practice of our religious and Christian heritage while preserving the North-South wildlife corridor connecting Gonzales Canyon and the San Dieguito River Valley as shown in the San Dieguito River Valley Master Plan and the City of San Diego Multiple Species Conservation Plan.

We urge you to consider these reasons which we submit in response and opposition to the conditions 1 and 2 recommended by staff. Reducing the height of our Church would violate every principal for which we stand. We agree it would not affect its functionality but it would not be a Church true to our faith.

Attempting to hide the Church or realigning placement of the buildings will totally compromise and destroy 6-years of work to achieve a perfect balance of aesthetics and lot utilization of a severely constrained site. This would be unreasonable, unfeasible, and add untold expense and delay to an already extraordinarily lengthy process. Residents of San Diego, visitors and vacationers would be deprived of the beauty of this Church. Why would we want such an effort of time and expense; the culmination of a decades old dream result in our Church shamelessly hidden from view. We have worked with your staff for nearly a year to reach this critical point and hopefully your support. However, those two project conditions are simply unacceptable. These conditions significantly impact

Dr. Charles Lester, Executive Director

January 11, 2016

Page 3 of 3

our project to such a degree they violate the very core principles that motivated and inspired this project in the first place. The project as proposed does not impact views of the coast, ocean, or San Dieguito River. The visual simulations clearly demonstrate the Church is barely visible from all but one of 12 view points and the difference to views at 50-feet verses 85-feet is barely discernible. If 50-feet in height is acceptable, why not 85-feet if visually the impact is virtually the same.

We urge you to consider the beautiful and thoughtful design with strict attention to careful environmental stewardship. We ask you to consider the importance of our being able to exercise and practice our religious worship in a manner that honors 1700-years of faith and history. While we appreciate and respect the efforts of staff, in particular Brittney Laver, we disagree with their proposed conditions 1&2.

We respectfully ask the commission to approve our project as submitted.

Respectfully,

A handwritten signature in black ink, reading "Harry Krikorian". The signature is fluid and cursive, with the first name "Harry" and last name "Krikorian" clearly legible.

Harry G. Krikorian, Chairman
St, John Garabed Armenian Church Trust

Enclosure



Armenian Church Architecture

The history of Armenian ecclesiastical architecture begins with Armenia's conversion to Christianity, and almost simultaneously the construction of the Cathedral of Holy Etchmiadzin at the beginning of the fourth century. Although the church has since undergone at least two major reconstructions, its foundations indicate the centralized plan, crowned with a conical dome, that later became the classic design of Armenian Church architecture.

The triumph of Armenian architecture, nonetheless, is at Ani, an ancient city which, during the tenth century, became a royal capital, and, consequently, the largest and richest city in Armenia. The Cathedral of Ani, completed in 1001, was the masterpiece of the architect Trdat, the same architect who repaired the dome of the Hagia Sophia in Constantinople after a devastating earthquake.

Armenian architecture, and particularly the Cathedral of Ani, holds an important place in medieval architecture, suggesting in many ways what was to come later in Romanesque and Gothic styles of Western Europe. Other jewels of Armenian architecture are the Holy Cross Church on the island of Aghtamar, St. Hripsime Church in Vagharshapat, the Cathedral of Marmashen near Gyumri (pictured above), as well as the monasteries at Keghart, Sanahin, and Haghbat.

There are two distinctive features of Armenian Church architecture. The first is the use of double-intersecting arches to span the interior space, eliminating the need for the supporting columns familiar in other types of churches. In early Armenian churches, these arches were stone; though in more contemporary construction, including that of St. Vartan Cathedral in New York, steel has been used. The second feature is the pyramidal dome, supported by a drum, which is supported in turn by intersecting arches.

—Adapted from *The Consecration of a Cathedral* by Arthur X. Tuohy

LS

RECEIVED

January 3, 2016

JAN 06 2016

Chair Steve Kinsey
Member of the California Coastal commission
C/O Diana Lilly, Coastal Program Analyst
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

RE: St. John Garabed Church, App-14-0142

Dear Mr. Kinsey,

I am a member of the St. John Garabed Armenian Church and of the Armenian community in San Diego. We are pleased to have the opportunity to present our beautiful church and support buildings to the Coastal Commission for the final approval we need so that we can build our new home.

We were dismayed to read that the Coastal Commission's staff has recommended that you approve the project only if you require that it be modified in such a way that it will no longer look like an Armenian Church and also put the most utilitarian building in the most prominent position and push the sanctuary to the rear.

When our congregation embarked on this project many years ago, we knew we had acquired a very special property that would require great environmental care. We have agreed to restore a portion of the degraded wetlands and protect an important wildlife corridor. But we never thought that our beautiful church on the edge of a valley, so reminiscent of traditional churches that have existed in Armenia for as long as 1,700 years, would be considered inappropriate for this site.

We urge you to consider the beautiful design, the careful environmental stewardship and our need for a place we can gather and worship among the architecture and artifacts of our long Christian heritage.

Sincerely,
Diana Papazian
(Mrs.) Diana Papazian
3774 Carnegie Drive
Oceanside, CA 92056

LETTER 1 of 8

January 4, 2016

Chair Steve Kinsey
Member of the California Coastal Commission
c/o Diana Lilly, Coastal Program Analyst
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108

RE: St. John Garabed Church, App-6-15-0142

Dear Coastal Commission,

I write in support of the new Armenian Church campus in Del Mar, California. My father, may he rest in peace, was an original founding member of this project and though I am living abroad right now (serving as a U.S. Ambassador in Asia), I feel compelled to offer this letter in support of the project, which is so important to the Armenian community in San Diego.

Armenian churches have maintained their essential design for over a thousand years, and these churches' height is often their largest dimension. Their form is iconic--immediately recognizable and a strong symbol of Armenian culture and religion. The church design in question has a small footprint, so its impact is minimized though it retains the classic elevation.

Relative to other churches in the area, this one is quite modest. This is no Mormon Temple, yet the Armenian community in San Diego would like it to be visible to the public, as other churches in the area are, because it is understandably proud of this undertaking, because it showcases the cultural diversity of North County, and because it will make an aesthetic contribution to the region.

It seems to me that there should be a way for an architecturally accurate, classic church design, in a somewhat visible location, to fit well within your guidelines.

Thank you for your good work in protecting and preserving California's coasts.

Warmest,

A handwritten signature in black ink, appearing to be 'Nina Hachigian', with a stylized, cursive script.

Nina Hachigian
Unit 8200, Box 021 DPO, AP 96520

Chair Steve Kinsey

Member of the California Coastal Commission

c/o Diana Lilly, Coastal Program Analyst

7575 Metropolitan Drive. Suite 103

Re: St. John Garabed Church,

RECEIVED

JAN 11 2016

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

App. 14-0142

Dear Mr. Kinsey,

I'm writing this letter to plead for your favorable vote in the matter of St. John Garabed Church when you meet on January 14, 2016. The proposed spiritual complex is an enormous source of pride for our emerging community and it was carefully designed to reflect our 1700 hundred year spiritual heritage.

We are fully mindful and we absolutely respect the complexity of your responsibility to preserve the environment and quality of life in our communities. But if there is any wiggle room in your criteria for approving our plan, we urge you to give a favorable vote for immediate approval.

Some of us are along in years and as such, time is of the essence for us. Even if you give the green light today, it may take another couple years before we see the beautiful edifice many of us have dreamed of for a long, long time. Please hear the pleas of our seniors who are doing their best to hang around until the new Church is constructed.

Regardless of whether or not you approve our plan today, we extend our deep appreciation for the important role you play in preserving the quality of our neighborhoods. We hope you will agree with the adjacent community and the City of San Diego that St, John Garabed Armenian Church is a beautiful addition that we can all be proud of.

Respectfully,

Berge Minassian

5/

RECEIVED

JAN 11 2016

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Ani Kradjian age 10
January 6, 2016

Chairman Steve Kinsey
Member of the California Coastal Commission
c/o Diana Lilly, Coastal Program Analyst
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108

RE: St. John Garabed Church, App-6-15-0142

Dear Mr. Kinsey,

I am a student at St. John Garabed Church. Everyday new kids and families come to our church, which is a good thing! But we are running out of room. I love our church, but it does not have Armenian architecture. The new church will give us more room, and give kids the chance to see real Armenian art. Please vote yes so we can build our Armenian church. More people will come and learn about the Armenian heritage along with our faith. We need this new church, and we need your vote yes. Please vote yes for our church.
Thank you!

Sincerely,

Ani Kradjian age 10

4486 Rosecliff Pl. San Diego, CA
92130

Dear California Coastal Commission, Mr. Kinsey,

We are running out of room and parking spaces. We need more class rooms to learn about our faith and others. It's far away

for lots of people to get to our old church. Please vote for our new Armenian church. Thank you.

look on back →

From,

RECEIVED

JAN 11 2016

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

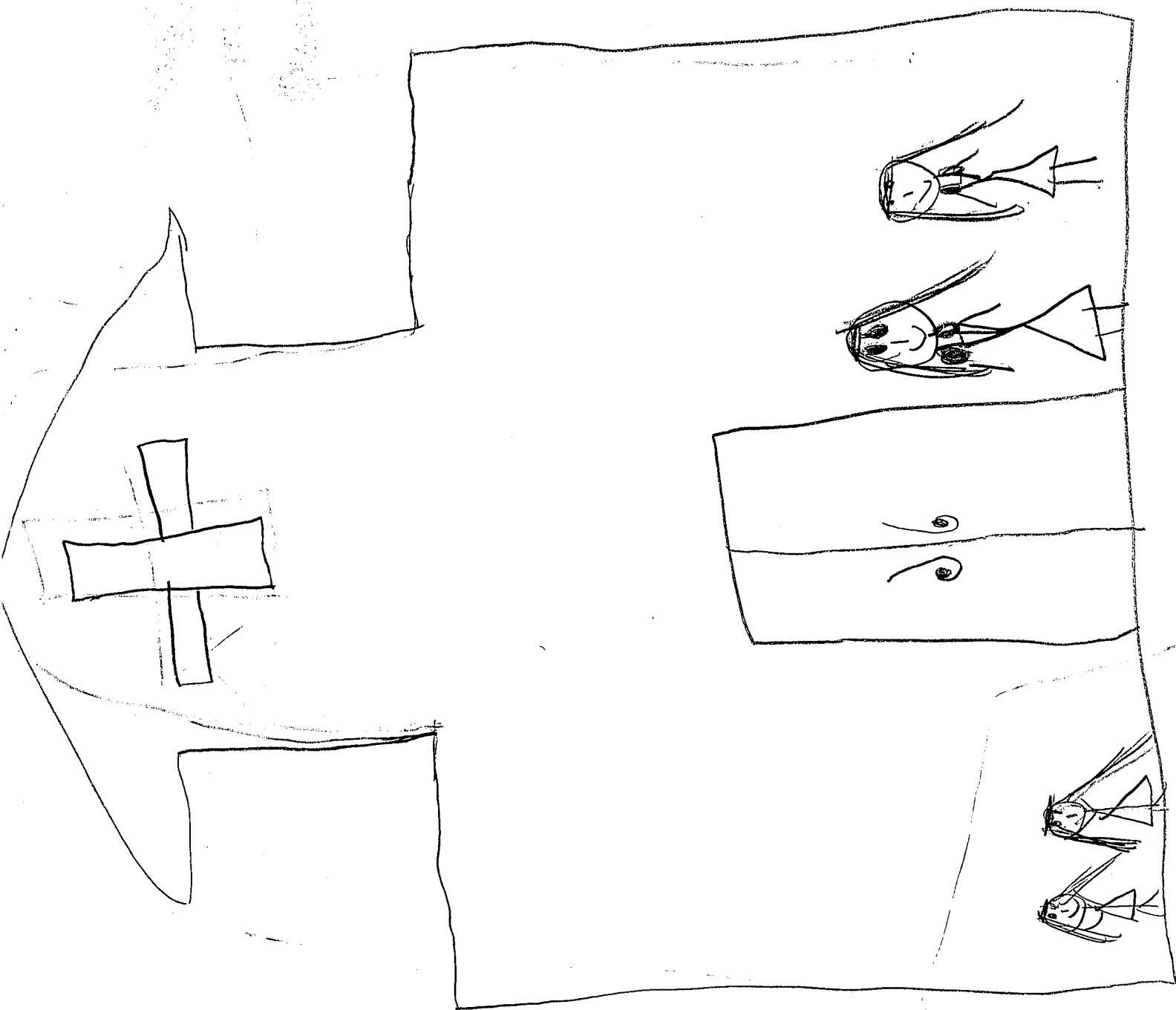
St. John Garabed Church

App 6-15-0142

Jan. 4, 2016

Mari Kradjian Age 6

4486 Rose cliff Pl San Diego, CA 92130



STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0039
(916) 651-4039
FAX (916) 651-4939

DISTRICT OFFICE
701 B Street, Suite 1840
SAN DIEGO, CA 92101
(619) 645-3133
FAX (619) 645-3144

WEBSITE
<http://sd39.senate.ca.gov>

California Legislature



MARTY BLOCK
SENATOR, THIRTY-NINTH DISTRICT

COMMITTEES
CHAIR, BANKING & FINANCIAL
INSTITUTIONS
CHAIR, BUDGET SUBCOMMITTEE
NO.1, EDUCATION
BUDGET & FISCAL REVIEW
BUSINESS, PROFESSIONS &
ECONOMIC DEVELOPMENT
EDUCATION
GOVERNMENTAL ORGANIZATION

CHAIR, LEGISLATIVE JEWISH
CAUCUS

January 11, 2016

Honorable Chairman Steve Kinsey and Commissioners
California Coastal Commission
Attn.: Dr. Charles Lester, Executive Director
45 Fremont Street, Suite 2000
San Francisco, CA 94105

RE: St. John Garabed Church, App-6-15-0142

Dear Chairman Kinsey and Commissioners:

I am writing in support of the St. John Garabed Armenian Church project (Coastal Application 6-15-0142), including the height and configuration elements that were submitted to the Coastal Commission.

As the Chairperson of the California Legislative Jewish Caucus, I firmly believe that all people of faith deserve a space to congregate and worship freely. I support this church's proposed facility on El Camino Real in the City of San Diego. During the past 35 years, the Armenian community has practiced their faith in a converted synagogue located in downtown San Diego.

The Church has agreed to the staff conditions, with the exception of two conditions that are in direct conflict with their religious architectural requirements. Specifically, in accordance with their faith, the church requires a particular site configuration and a domed ceiling higher than the main roof line.

A redesign will lead the Church to spend additional time and resources as the project will need to return through the City of San Diego's development process and seek relief from the City's zoning requirements. Renderings and simulations of the proposed project demonstrate that views of the ocean, coast, and the San Dieguito River would not be impacted.

With strong community support in the area immediately surrounding the project site, I urge you to consider the beautiful design of the Church and associated buildings, the congregation's environmental commitment to preserve the North-South wildlife corridor and their need for a place to worship consistent with their Christian faith and heritage.

As the State Senator for the 39th Senate District which includes the project site, I encourage the Commission to support the St. John Garabed Church project as submitted. Please do not hesitate to contact me at (619) 645-3133 should you have any questions. Thank you for your consideration.

Sincerely,

MARTY BLOCK
Senator, 39th District

Proudly representing the cities and communities of San Diego, Del Mar, Solana Beach, and

EXHIBIT NO. 27
APPLICATION NO.
6-15-0142
Letters of Support
 California Coastal Commission

January 7, 2016

Th17a

Chair Steve Kinsey
Member of the California Coastal Commission
C/o Diana Lilly, Coastal Program Analyst
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108

RECEIVED

JAN 12 2016

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

RE: St. John Garabed Church, App-6-15-0142

Dear Mr. Kinsey,

I wholeheartedly support the original design and configuration of the buildings of the St. John Garabed Armenian Apostolic Church, designed by Dennis Hyndman. Mr. Hyndman is the renowned architect for many of the beautiful churches in our region, most notably the Mormon Temple in La Jolla.

The thought and care taken in the placement of our church and its buildings on our site adjacent to the San Dieguito River Valley must not be changed. The site design is optimal for this House of Worship. The church, as designed, enhances the beauty and serenity of the natural setting of this river valley and surroundings, as well as the urban setting around this entire area.

The historic design of our church originated in the 7th Century. It is regretful that Staff recommended a reduction in the height of the church and the height of the dome, thereby changing a magnificent building into a less than remarkable box.

View impacts, as perceived by Staff, are the stated causes for these changes. One need only study the alternative photo exhibits presented in this report to see that such reconfiguration of the site and the shortening of this glorious architectural design by Mr. Hyndman is unwarranted, unnecessary and a miscarriage of the intent of the Coastal Act.

The original design of this impressive sanctuary complements the San Dieguito River Valley and is destined to become a noteworthy landmark in San Diego,

I request you deny the Staff Recommendations which
#1) shortens the height of the Church building and height to the top of the dome.
#2) would reconfigure the site plan and placement of the buildings.

Respectfully,

Marie Dardarian

Marie Dardarian
1404 Rubenstein Avenue
Cardiff by the Sea, CA

January 8, 2016

Th17a

RECEIVED

JAN 12 2016

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

Chair Steve Kinsey
Member of the California Coastal Commission
c/o Diana Lilly, Coastal Program Analyst
7575 Metropolitan Drive, Suite 103
San Diego, CA 92108

RE: St. John Garabed Church, App-14-0142

Dear Mr. Kinsey,

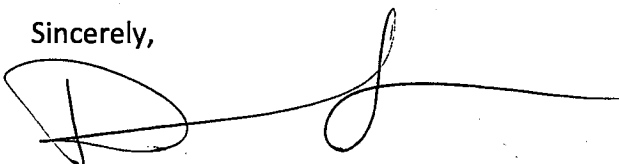
I am a member of the St. John Garabed Armenian Church and of the Armenian community in San Diego. We are pleased to have the opportunity to present our beautiful church and support buildings to the Coastal Commission for the final approval we need so that we can build our new home.

We were dismayed to read that the Coastal Commission's staff has recommended that you approve the project only if you require that it be modified in such a way that it will no longer look like an Armenian Church, and also put the most utilitarian building in the most prominent position and push the sanctuary to the rear.

When our congregation embarked on this project many years ago, we knew we had acquired a very special property that would require great environmental care. We have agreed to restore a portion of the degraded wetlands, and protect an important wildlife corridor. But we never thought that our beautiful church on the edge of a valley, so reminiscent of traditional churches that have existed in Armenia for as long as 1,700 years, would be considered inappropriate for this site.

We urge you to consider the beautiful design, the careful environmental stewardship and our need for a place we can gather and worship among the architecture and artifacts of our long Christian heritage.

Sincerely,



David Valdezian

LETTER 1 of 6

Th 17a

EX PARTE COMMUNICATION DISCLOSURE FORM

Filed by Commissioner: Carole Groom

1) Name or description of project: Item Th17a - App. No. 6-15-0142 (St. John Garabed Church)

2) Date and time of receipt of communication: Jan. 7, 2016 at 4:00 p.m.

3) Location of communication: Telephone

(If not in person, include the means of communication, e.g., telephone, e-mail, etc.)

4) Identity of person(s) initiating communication: Kathi Riser, Marcela Escobar-Eck

5) Identity of person(s) on whose behalf communication was made: Atlantis Group
representing St. John Garabed Armenian Church

6) Identity of persons(s) receiving communication: Carole Groom

7) Identity of all person(s) present during the communication: Carole Groom,
Marcela Escobar-Eck

Complete, comprehensive description of communication content (attach complete set of any text or graphic material presented):

The representative of St. John Garabed Armenian Church indicated that conditions of approval required by staff to change site design and reduce the height in order to reduce visual impacts would render the project infeasible. The representative provided visual images to show that there is no impact to coastal views, which have been provided to staff. Ms. Escobar-Eck also shared that no environmental groups are opposed to the project and that it contains extensive habitat restoration. She maintained that the project has received support from the city and is consistent with the LCP.

Jan 11 2016

Date

Carole Groom

Signature of Commissioner

TIMING FOR FILING OF DISCLOSURE FORM: File this form with the Executive Director within seven (7) days of the ex parte communication, if the communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication. If the communication occurred within seven days of the hearing, provide the information orally on the record of the proceeding and provide the Executive Director with a copy of any written material that was part of the communication. This form may be filed with the Executive Director in advance of the disclosure.

EXHIBIT NO. 28

APPLICATION NO.

6-15-0142

Ex-Parte Communication

Disclosure Forms

California Coastal Commission

RECEIVED
JAN 12 2016
SAN DIEGO COASTAL COMMISSION

Th 17a

EX PARTE COMMUNICATION DISCLOSURE FORM

Filed by Commissioner: Wendy Mitchell

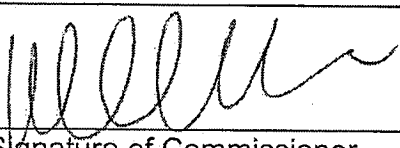
- 1) Name or description of project: St. John Garabed Armenian Church
- 2) Date and time of receipt of communication: January 8, 2016 at 10:15 PM
- 3) Location of communication: Via Email and Telephone
(If not in person, include the means of communication, e.g., telephone, e-mail, etc.)
- 4) Identity of person(s) initiating communication: Marcela Escobar-Eck
- 5) Identity of person(s) on whose behalf communication was made: St. John Garabed Armenian Church Trust Committee
- 6) Identity of persons(s) receiving communication: Commissioner Wendy Mitchell
- 7) Identity of all person(s) present during the communication: Marcela Escobar-Eck

Complete, comprehensive description of communication content (attach complete set of any text or graphic material presented):

Reviewed the history of project processing with City of San Diego, state and federal resource agencies and Coastal staff. Reviewed the materials contained in a binder that is also being provided to Coastal staff, including communication between applicant and staff, visual simulations, project graphics, history of Armenian Church architecture, excerpts from City of San Diego EIR, etc.
Reviewed staff's request for project changes to church height and site configuration.

1/8/2016

Date


Signature of Commissioner

RECEIVED
JAN 12 2016

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COUNTY DISTRICT

TIMING FOR FILING OF DISCLOSURE FORM: File this form with the Executive Director within seven (7) days of the ex parte communication, if the communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication. If the communication occurred within seven (7) days of the hearing, provide the information orally on the record of the proceeding and provide the Executive Director with a copy of any written material that was part of the communication. This form may be filed with the Executive Director in addition to the oral disclosure.

TH 17a

EX PARTE COMMUNICATION DISCLOSURE FORM

Filed by Commissioner: Mary Luevano

1) Name or description of project:

St. John Garabed Armenian Apostolic Church Trust 6-15-0142 (St. John Garabed Armenian Apostolic Church, San Diego)

2) Date and time of receipt of communication: Monday, January 11, 9AM

3) Location of communication: telephone call

(If not in person, include the means of communication, e.g., telephone, e-mail, etc.)

4) Identity of person(s) initiating communication: Kathi Riser, Tyler Sherer

5) Identity of person(s) on whose behalf communication was made: Harry Krikorian, Maria Escobar-Eck

6) Identity of persons(s) receiving communication: Mary Luevano

7) Identity of all person(s) present during the communication: Maria Escobar-Eck

Complete, comprehensive description of communication content (attach complete set of any text or graphic material presented):

Applicant provided overview of project and discussed the following:

Design conforms to the LCP. Worked hard for seven years to get to a project that is not opposed

Proportions of the church are very important/specific to Armenian architecture

Very few other properties in this area (river valley) that are developable, highly constricted area, few uses allowed. Can't flip site plan because of the setback requirements.

Project encroaches a bit on setback, this was done to allow more land for conservation (request of FWS). Created Memorial Garden to tell story of Armenian genocide. This area will be made available to public as will the Cultural and Education center and Youth Center

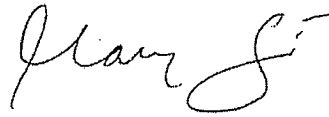
Agree to disagree with staff on the community character issue. In working with City staff one of the steps taken was to break project into smaller buildings to give a smaller and more open feel Pardee Homes which has a residential development above the project did not feel project was blocking any views

Surrounding development is varied in character (ag, residential, some commercial), applicant views this project as transitional development (from ag to urban neighborhood), using sensitive colors, materials and design – feel all these address the community character issues

Project has support from the JPA

January 11, 2016

Date



Signature of Commissioner

TIMING FOR FILING OF DISCLOSURE FORM: File this form with the Executive Director within seven (7) days of the ex parte communication, if the communication occurred seven or more days in advance of the Commission hearing on the item that was the subject of the communication. If communication occurred within seven days of the hearing, provide the information orally on the record of the proceeding and provide the Executive Director with a copy of any written material that was part of the communication. This form may be filed with the Executive Director in addition to the oral disclosure.

RECEIVED

JAN 11 2016

CALIFORNIA
COASTAL COMMISSION
SANDIEGO COAST DISTRICT