

Dec 3, 2024

From:

The John Family
Stallions Crossing Residents
kall70ach@san.rr.com

To:

City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101
DSDEAS@SANDIEGO.GOV

Subject: Our concerns about the El Camino Real Assisted Living Facility (No. 675732)
Final Subsequent Environmental Impact Report (S.E.I.R) and recent
findings of fact

TO WHOM IT MAY CONCERN:

We are residents of Stallions Crossing, a community just south of the proposed El Camino Real Assisted Living Facility. Our home's back fence looks on to the wonderful Proposition A protected open space on which this monstrosity of a structure is proposed to be built.

We want to express our deep reservations about this project in this letter.

First of all, we love our neighbors. We have many elderly in our community at Stallions, who take advantage of the abundant open space all around us. Many of them moved into this area precisely because of the semi-rural nature of these surroundings.

We also love our Church neighbors who are presently using the spaces behind us. The Formosan Church AND the Armenian Church. In fact, recently, as my family was considering attending a Church service near us, we considered attending either of these Churches.

Our issue is NOT with the Church or any of their parishioners. Our issue is with the destruction of the wonderful open space that characterizes this area which is inevitable with the construction of this behemoth of a building crammed into less than 20% of the Church property.

In our opinion, the City is being negligent in its environmental report for the reasons highlighted below.

- A. This Assisted Living Home proposal seeks to allow a variance to the City's "Managed Growth Initiative" (also known as Proposition A, passed by the voters in 1985).

The Developer is seeking to allow the proposed project with a rarely used "uncodified Conditional Use Permit (CUP) ordinance".

Please note that the 1985 voter-approved “Proposition A” expressly forbids hospitals, intermediate care facilities and nursing homes on Prop A lands.)

The parcel of land is in the San Dieguito River Park (SDRP)’s “Focused Planning Area” and the “North City Future Urbanizing Area (NCFUA)” subarea II. The City of San Diego General Plan, the NCFUA Framework Plan, the Multiple Species Conservation Plan (MSCP) and the SDRP Concept Plan, ALL designate this locale as open space. Given the major conversion of open space, a more thorough explanation and justification of this action is merited.

It is significant that the Developer is attempting to process an “Uncodified Conditional Use Permit” amendment to city regulations (Council Policies 600-29 and 600-30) in order to exempt this development from Proposition A and other open space restrictions.

Please do NOT justify the deviation from relevant land use policies regarding open space preservation, at a cost to the river park and other open space assured for the public, through City-wide ballot measures and City-approved actions, policies, and guidelines.

This major change in land use to a large commercial facility in open space and surrounding low-density residential development would significantly impact the character of the area.

This should be a decision by the electorate, and should be voted on by the people, not the City Council.

Please preserve the semi-rural character of the river valley and upland area, which are there for voter approved reasons, for the preservation of the present tranquil fabric of this open space right here in Carmel Valley, kept here for us to enjoy and wildlife to flourish.

The recently published finding of facts does not adequately address the above concerns.

- B. This project is NOT looking at alternative options. Instead, the applicant is stating that the project must be accepted and approved as proposed.

The applicant has stated this several times in their presentations at the Carmel Valley Community Planning Board meetings.

The applicant’s narrowly written objectives (walking distance to adjacent Church, “under-utilized” site) do not allow for a reasonable range of alternatives.

CEQA requires that project alternatives be explored! By writing up the objectives in such a narrow manner, the applicant is requiring us to believe that their hands are tied.

The laws are clear on this issue. It is not that the applicant cannot build. They must only build within the clearly stated rules of how one may build on these protected open spaces.

The final S.E.I.R does not adequately explore alternatives and is not convincing in its reasons for allowing the destruction of the open space in this parcel of land.

The proposed project must therefore be REDESIGNED to comply with the existing zoning and land ordinances. The recently published finding of facts does not show any attempt to adequately REDESIGN the project.

- C. The proposed project as designed fails to adequately consider the restoration of over 200 acres of San Dieguito Lagoon tidal wetland habitat immediately to the west of the project site and a critical part of the wildlife corridor and regional connectivity.

Millions of dollars are being invested into this restoration project.

The final EIR fails to discuss the potential impacts that the building mass, combined with other recently constructed adjacent buildings, would create in limiting the movement of wildlife through this area.

This project goes AGAINST all these improvements, by building a large MONSTROSITY that will block and scare away wildlife from this area. The recently published finding of facts does not address this concern.

- D. The DENSITY of the proposed construction is a cause for grave concern.

The Church and its surrounding buildings spread >50,000 square feet of building space over a space of ~13.4 acres.

This proposed project crams in >105,000 square feet of building space over a space of ~4 acres.

How is this in anyone's wildest imaginations complying with zoning laws and Proposition-A mandated open space low density construction?

How is this by any means keeping with the character of this neighborhood?

The proposed development just does not fit with the neighborhood and would drastically change the overall character of this area. The visual impact of this monstrosity is obvious. This type of development does NOT fit with this area AT ALL.

As all who live in this neighborhood know, this area is primarily OPEN SPACE, and any construction should be appropriately sized to keep with the LOW DENSITY of this area.

The recently published finding of facts does not address this concern.

- E. Views.

At the present time, our homes enjoy the open space views from our backyards. We have views to the northern hills, and the ocean to the west.

This 3-story building as presently designed will completely destroy these views.

In addition, this project also impacts views for wildlife that calls this space their home.

The recently published finding of facts does not address this concern.

F. Further about wildlife.

This project combined with the adjacent buildings will harm the function and values of the wildlife corridor and scare away and destroy the habitat for the fauna of this region.

The proposed project's required narrow setback is insufficient to mitigate the impacts to the corridor's function and importance to needed wildlife linkages.

The recently published finding of facts does not adequately address this concern.

G. This is a situation of death by a thousand cuts.

Slowly but surely, the CUMULATIVE impacts of adding this project in combination with the other buildings approved on this plot of land are destroying the very fabric of this community. The CUMULATIVE impacts are NOT sufficiently addressed or mitigated in the final S.E.I.R.

In publishing the recent finding of facts, the City is turning a blind eye to this concern.

H. Traffic issues.

For public safety concerns there must be a COMPREHENSIVE TRAFFIC study (NOT DURING THE SUPPRESSED TRAFFIC MONTHS OF COVID). The developer is trying to avoid this comprehensive study because it will expose the DANGERS of the one entrance/exit.

The proposed development should NOT BE SEPARATED from the Church and the 3 additional buildings for traffic calculations and other impact studies.

This entrance/exit is at the bottom of a hill (El Camino Real) and in the middle of the BLIND CURVE. This part of El Camino Real is either a speedway or bumper to bumper traffic. Bicyclists will have to navigate across a dangerous deceleration and acceleration lane for the one entrance/exit of ALL FOUR buildings.

In publishing the recent finding of facts, this concern is not addressed.

I. Noise, Size, Health and Safety issues.

The SIZE, SCALE, and MASSING do not fit on this parcel in our community. This facility should be scaled down or moved to a different parcel. It would drastically CHANGE the CHARACTER of the neighborhood and community

The proposed project's required narrow setback is insufficient to mitigate the impacts to the corridor's function and importance to needed wildlife linkages. The negative impacts including noise, human activity, lights and the size/bulk of the project are clearly incompatible with the surrounding area.

The parcel for this proposed structure is LANDLOCKED and using the same entrance/exit as the

church and other buildings that are already approved and forthcoming. The location of this structure is dangerous for the community and its future residents.

The proximity of this MONSTROSITY itself is a POLLUTION to our present neighborhood. The building of this structure is going to be a significant impact for ALL, especially those living near this development, including wildlife. The construction noise, vibrations, dirt, dust, debris, all disturbing our community for the duration of construction.

In publishing the recent finding of facts, these concerns are not addressed.

Kindly REJECT this project. In our opinion, the project in its current form is a blatant violation of existing laws.

Sincerely,

Johnny John
Head of Household
The John Family
Residents at Stallions Crossing.