

## Comments Letter

I-2-

October 6, 2017

Marisa Smith  
County of San Diego  
Department of Planning and Land Use  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123

Subject: Chinese Bible Church of San Diego Proposed Project, Supplemental Environmental Impact Report, and Specific Plan Amendment

Dear Ms. Smith,

The purpose of this letter is to raise serious and insurmountable issues with the proposed Chinese Bible Church mega-project on Four Gee road, per the most recent supplemental environmental impact report and specific plan amendment. My family and I own a home on Silver Crest Lane immediately abutting the east side of the proposed site, which the most recently available supplemental environmental impact report and specific plan amendment mentions as the most affected neighborhood. Our issues are as follows:

- **Aesthetics:** Our concerns with aesthetics are twofold. First, designated and overflow parking spaces would run the length of the property abutting my neighborhood and parking lot lights, regardless of how they are shielded, would create substantial light pollution. There is no way that the aesthetic issues of the parking will be sufficiently shielded by a small number of citrus trees along a chain link fence, as proposed by the applicant. Second, the sheer scale of the proposed buildings would aggressively consume the skyline in a way that the church would be all we see from our backyard or back windows. Despite our slight elevation advantage, the structures would tower 20 feet above our back yard (with spires even higher) and run most of the length of our block. It should be noted that our neighborhood has a wrought iron fence separating our yards from the proposed site, leaving us very exposed to these aesthetic issues.
- **Land Use Intensity:** We purchased our home with the understanding that the property in question would be developed in a “low medium density” manner. In fact, we paid a \$50,000 premium for our lot compared to the same model of home across the street in our development in order to abut the “low medium density” residential site. The proposed size of the Chinese Bible Church project, however, is similar to the average traditional Walmart Discount Store according a recent Walmart 10-K filing. Whereas with residential housing on the site we would retain a large degree of space, the proposed cluster of structures would aggressively consume the skyline in a way that it would be all we see from our backyard or back windows. This is an extreme and unacceptable change in the plan for Santa Fe Valley.
- **Noise:** Clearly the traffic and parking lot noise would be bothersome at this scale, and for seven days and nights a week based on the proposal. However, possibly more troubling, is the fact that the portion of the compound closest to our house is the Fellowship Hall, a concert and event hall in which the applicant desires the right to hold events seven nights a week. This is particularly bothersome for residential households with young children such as ours and those of our neighbors.

I-2-1

I-2-2

I-2-3

I-2-4

I-2-5

I-2-6

I-2-7

I-2-8

## Response to Comments Letter

I-2-

I-2-1

The County of San Diego appreciates the comments on the Draft Supplemental Environmental Impact Report (DSEIR) from Jason Hightower. This comment letter and the associated responses will be made a part of the Final SEIR that will be provided to the decision makers before they make a decision about the project. The comment makes general statements in opposition to the project.

I-2-2

The comment concerns the aesthetics of the overflow parking area along the eastern boundary of the site. Lighting was analyzed in the photometric study (DSEIR Appendix D). Section 4.3, Item 3 on page 13 states that the project will not generate light trespass that exceeds 0.2 foot-candles measured five feet onto the adjacent property. The project includes landscaped buffers separating the development from adjacent single-story development to reduce spillover effects. The project has been designed to comply with the County's Light Pollution Code (LPC) through reduced hours and type of lighting. Additionally, as detailed in Section 7.2.1 of the DSEIR, the project incorporates the following design features related to lighting:

- Use full cutoff luminaries, as defined by the Illuminating Engineering Society of North America (IESNA), to minimize the amount of light emitted upward directly from the luminaire. A fully shielded outdoor light ensures that light rays emitted from the fixture are projected below the horizontal plane passing through the lowest point on the fixture from which the light is emitted (LPC Section 59.105).
- Restrict the hours of operation of outdoor lighting to hours of active use (LPC Section 59.107 and Zoning Ordinance Section 6322).
- Require low-pressure sodium light sources<sup>1</sup>, which allow astronomers to filter the line spectra from telescopic images (LPC Section 59.105).
- Prohibit the post-construction addition of outdoor lighting that was not included in the Project.
- Select luminaries that control the intensity (candela) distribution (LPC Section 59.105).

<sup>1</sup> The Project proposes LED lighting that provides an equivalent or better lighting benefit.

**I-2-2  
Cont.**

- Use well-shielded luminaries (LPC Section 59.105).
- Keep floodlight angles aimed low enabling the entire beam to fall within the intended area to be lit.
- Use full cutoff and semi-cutoff lighting. Cutoff designations limit the intensity values in the glare zone and provide shielding (Zoning Ordinance Section 6324).
- Adjust mounting height to reduce spill light (Zoning Ordinance Section 6324).
- Focus exterior illumination, including floodlights and spotlights, downward and into the Project site. A combination of shielding, screening, and directing the lighting away from off-site areas shall be used to minimize spillover effects onto off-site roadways, properties, and open space areas.
- Use landscaping to serve as filtering devices to soften the impact of direct exterior, reflected exterior, and building interior lighting.
- Prohibit signs with flashing, mechanical, strobe, blinking lights, or moving parts.
- Limit lighted monument signs.
- Use low-level pedestrian lighting (e.g., bollards) on the site for pedestrian pathways.
- Use lowest intensity Project lighting necessary for security and safety purposes while still adhering to the recommended levels of the IESNA.

In summary, it was determined that the lighting plan met County requirements and that impacts were not significant.

The visual study for the project evaluated the project's design features and proposed mitigation to screen the parking lot (Appendix C of the DSEIR). There are a number of screening elements used. Buildings are set back from the boundary and are set apart to reduce the appearance of mass. Four "layers" of landscaping are used between the fence proposed on the east boundary and the buildings. These include: (1) the vines and dwarf lemons along the fence itself; (2) magnolia trees east of the first parking row; (3) magnolia and cape myrtle trees west of the second parking row, and (4) olive and cape myrtle trees, and different shrubs up against the buildings. Gravel will be an earth toned non-reflective surface to minimize glare. The pavement will be non-reflective. The visual study for the project determined that visual impacts from the east are adequately addressed by the project design, and that screening could begin sooner with the use of larger planting stock to speed the screening process, as required by mitigation measures M-VIS-2 and M-VIS-3, as detailed below:

- M-VIS-2: Install 36" boxed citrus, 10 gallon shrubs, and 10 gallon vines at the earliest possible point during Project construction. At corners of the eastern boundary, the proposed California peppers shall be 48" box size. Along the east-facing sidewalk, the proposed crepe myrtle shall be 48" box size.

## Comments Letter

I-2-

## Response to Comments Letter

I-2-

**I-2-2**  
Cont.

- M-VIS-3 Install 48" trees and 10-gallon shrubs along the decorative fence line.

**I-2-3**

The comment states that the scale of the project would consume the skyline in the way the church would be seen from the commentator's backyard. The DSEIR discusses visual impacts from this direction. A photo-simulation from this direction is shown Figure 2.1-10, Key View 8, Looking from East of Project. It shows the effect of replacing the field and trees with development. Visually, from the eastern perspective, the Project will be built below or at grade, lowering the overall appearance of the buildings from the east. This effect is shown in Key View 8, where only the sanctuary and towers appear above the horizon line. The open space north of the site will remain undisturbed by the project, reserving it as a visual amenity for the houses along the eastern boundary. The County will include the comment as part of the Final SEIR for review and consideration by the decision-makers prior to a final decision on the project.

**I-2-4**

The comment concerns the land use intensity and real estate values of the project. The California Environmental Quality Act (CEQA) does not consider real estate values a subject for environmental evaluation; therefore, this discussion is not part of the DSEIR. The comment is correct in stating that the site is designated for low density residential uses. However, the proposed use is allowed with an approved Specific Plan Amendment and Major Use Permit. This comment will be made a part of the Final SEIR that will be provided decision makers before about a final decision on the project.

**I-2-5**

The comment compares the project to a Walmart store. Please see Response I-2-3 above for a discussion of the scale of the project. The project provides a number of design features that distinguish it from a "big box" design, which is generally associated with Walmart store designs. These include varied height elements, articulation of facades, varied wall heights, numerous window designs, arches, walks and courtyards between buildings, trellises, covered walks, decorative fencing and pavers for street construction in multiple areas. The landscape plan is also extensive, layering landscape features in all directions to provide visual variation and screening. The County will include the comment as part of the Final SEIR for review and consideration by the decision-makers prior to a final decision on the project.

**I-2-6**

The comment concerns the visual effects of the project on the skyline viewed from the east. Please see Response I-2-3 above.

**I-2-7**

The comment states general concerns related to traffic and parking lot noise. During the week, the activity level is expected to be low to moderate due to the nature of the use proposed. Sunday traffic will be heavier, but will be disbursed throughout the day, thereby lowering noise levels. Planned below grade parking on the south and setbacks

## Comments Letter

I-2-

Similar to the aesthetic issues, this is in no way mitigated by a chain link fence along the perimeter of the property.

- **Traffic:** At peak traffic times, which will occur not only on Sundays but potentially seven days a week based on the proposal, excess traffic will undoubtedly flow north and then east through our residential streets. This is of great concern for pedestrian safety given that our young children play out front with other neighborhood children daily.

When my wife and I purchased our home we assumed correctly that the farm would ultimately be developed. However, we expected the property to be developed with low density residential housing consistent with the zoning and previously approved site plan. Clearly we were not interested in living in the shadows of a project of such an extreme scale and intensity.

Thank you for your consideration.

Sincerely,



Jason Hightower  
16942 Silver Crest Lane  
San Diego, CA 92127  
858-832-1843

I-2-8  
Cont.

I-2-9

I-2-10

## Response to Comments Letter

I-2-

I-2-7  
Cont.

will further diminish noise. The DSEIR Section 2.5, evaluated noise that would be generated by project traffic and concluded that impact would be less than significant (page 2-107 of the DSEIR).

I-2-8

The comment concerns noise from the Fellowship Hall. The comment identifies that the Fellowship Hall is the closest building to their residence, and states that noise from events will not be mitigated by a chain link fence. Noise from church events in the church courtyard was calculated, based on 500 guests with all males and females speaking loudly a majority of the time to account for occasional shouting (DSEIR, Figure 2.5-4). The resulting noise generated was calculated at 46.2 dBA at the eastern boundary, which is below the 50 decibels allowed by County regulations.

The DSEIR, Section 2.5.3.1, page 2-106, also states:

The County of San Diego requires places of worship to be designed in order to attenuate, control, and maintain interior noise levels to below 45 dBA in noise-sensitive spaces. Current exterior building construction, which proposes plastered wall surfaces, is generally expected to achieve at least 15 dB of exterior-to-interior noise attenuation, with windows opened. Therefore, proposed building structures exposed to exterior noise levels greater than 60 CNEL could be subject to interior noise levels exceeding the 45 dBA CNEL noise limits for noise-sensitive spaces.

The DSEIR analysis determined that exterior spaces would not be subject to noise in excess of 60 CNEL. Therefore, interior spaces are not expected to exceed the 45 dBA CNEL limit and impacts would be less than significant.

The project proposes replacing the site's existing chain link and vinyl white panel fencing with a mix of wrought iron and vinyl coated chain link fencing. This fencing is part of the project design and is not intended to serve as noise mitigation. Section 2.5.6 (pages 2-113 and 2-114 of the DSEIR) identifies noise mitigation for outdoor events. The mitigation measures was modified to clarify the conditions under which it would apply:

**M-N-1** If any outdoor event is proposed that will involve the use of an audio system and that includes more than 500 people, or if the outdoor event will extend beyond 7 PM, the noise impacts of the specific event must include design features and mitigation measures to comply with the applicable regulations. Such measures would include, but are not limited to:

1. Locating events to maximize attenuation from intervening buildings and topography
2. Limiting the time of the event and cease all substantial noise generating activities by 10 PM.

**I-2-8**

Cont.

3. Limiting the number of attendees not to exceed 500 people to minimize impacts to off-site receptors.
4. Associated outdoor audio equipment shall be directed away from the occupied neighbors. Audio equipment would be directed in designated areas, facing towards the center of the site and/or using intervening structures to screen and shield associated noise sources.
5. The audio system will be tested prior to an event and the systems will be adjusted so noise does not exceed County noise limits.

No changes to the Draft SEIR are required as a result of this comment. This comment will be made a part of the Final SEIR that will be provided decision makers before about a final decision on the project.

**I-2-9**

This comment addresses peak traffic and traffic flows in the surrounding neighborhood. The comment states that traffic is of concern for pedestrian safety. During the week, the activity level is expected to be low to moderate due to the nature of the use proposed. The majority of the traffic will be on Sunday. Please see Section 1.2.2.7 of the DSEIR for the proposed operational hours and corresponding uses. This was reflected in the traffic analysis which considered project trip generation for both the weekday and weekend uses. Trip distribution and assignments were analyzed in the traffic study. The trip distribution and assignment are shown in Figure 3-6 of the traffic study and daily project trips are shown in Figures 3- 7 and 3-8 of the traffic study. Project trips for AM, PM and Sunday peak hours are shown in Figures 3-9 thru 3-11. Over 99 percent of the project traffic is forecasted to use Four Gee Road to Camino del Sur. Traffic is not expected to go through the adjacent neighborhoods. The County will include the comment as part of the Final SEIR for review and consideration by the decision-makers prior to a final decision on the project.

**I-2-10**

The comment concerns the development of the project site. The County acknowledges the comment and notes it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the DSEIR. No further response is required.