

## Comment Letter

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October 7, 2017

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County of San Diego  
5510 Overland Avenue, Suite 310  
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Re: PDS2014-SPA-14-001, PDS2010-3300-10-037(MUP), PDS2012-3940-12-002(VAC),  
PDS2010-3910-9508007L(ER), SCH# 214011018, Chinese Bible Church of San Diego

Below are our comments on the Draft Supplemental Environmental Impact Report (DSEIR) the Chinese Bible Church of San Diego, the Project as identified in the DSEIR.

Chapter 2, Paragraph 2.1 Aesthetics, subparagraph 2.1.2.1 Existing Settings states "*The east and central parts of the planning area have been developed whereas northern and western areas are more sparsely developed or are undeveloped. The Project site is surrounded by suburban development on the north, east, and south. The local area also encompasses some open space and undeveloped land. The Project site's general visual environment is composed of an open field with a dense grove of trees in the center of the site.*"

Chapter 2, Paragraph 2.1 Aesthetics, subparagraph 2.1.2.2 Project Site Visibility/Viewshed states "*The area to the northeast and east of the Project site is within the County of San Diego's 4S Ranch Specific Plan. The 4S Ranch land uses within the vicinity of the Project site primarily include single-family residential development, but at higher densities than the single-family estate residential development that lies to the north and northwest of the Project site. The single-family units to the east are on approximately 4,000 square foot lots and the units to the northeast are on approximately 6,250 square foot lots. The rear yards of approximately 15 houses adjacent to the Project site have views into the site. The ground view from these residences looks past wrought iron fencing and a landscaped embankment into the Project site.*"

Chapter 2, Paragraph 2.1 Aesthetics, subparagraph 2.1.2.5 Viewer response states "*Residents in the surrounding developments to the north, east, and south would be the most sensitive to the development of the Project site.*"

Chapter 2, Paragraph 2.1 Aesthetics, 2.1.3.1 Visual Character and Quality quote 1 "*As shown, buildings and rooflines would be visible above a range of landscape elements.*" and quote 2 "*Existing mature eucalyptus trees would be removed and replaced by a range of drought-tolerant trees that would grow to varied heights. As a result, a vegetative cover that is less intense and more dispersed would replace the density of vegetation in the existing condition. This varied vegetative cover over most of the site would replace the tall cluster of vegetation surrounded by flat fields.*"

## Response to Comment Letter

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- I-3-1** The County of San Diego appreciates the comments on the Draft Supplemental Environmental Impact Report (DSEIR) from Shamim, Habib, and Jasmin Husain. The County acknowledges the comment as an introduction to comments that follow. This comment is included in the Final SEIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.
- I-3-2** The comment cites passages in the aesthetics report. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required.
- I-3-3** The comment quotes two passages from Chapter 2, Section 2.1.3.1 Visual Character and Quality, which summarize viewshed elements and landscape features. The comment then identifies the aesthetic impacts, particularly to Key View 1, as a significant impact. Visual resources received extensive analysis in the DSEIR, and mitigation was identified for impacts to visual resources in 2.2 Aesthetics, specifically in Sections 2.2.4, Significance of Impacts Prior to Mitigation and 2.2.5 Mitigation. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. 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-3-4** The comment states that the height of buildings as portrayed in the land use report (Appendix O) are too high to be compatible with the surrounding residential uses. The County acknowledges the comment as the opinion of the commenter. For the purposes of clarification, towers are not proposed at 55 feet. Two towers are proposed at 48 feet and one tower at 53 feet. The towers were analyzed in Section 2.1.3.1 of the Draft SEIR and were also depicted in the Key View visual simulations. Impacts related to the towers were determined to be less than significant. This comment will be incorporated as part of the Final SEIR that will be provided to decision makers prior to a final decision on the project. No further response is required.

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The above two quotes are from Key View 1. The aesthetic impacts listed in their own report are significant to the neighbors.

Upon further examining the proposed building elevations in Figures 12a and 12b of the Appendix O. Land Use, clearly indicate that proposed church buildings will form a solid wall of 40 feet height with tower elements reaching a height of 55 feet. The proposed church development is too high to be compatible with the adjoining two story residential uses of approximately 20 to 25 feet high located to the east and southeast of the proposed site. The landscaping indicated is of sparsely distributed Palm trees not at all in character with the existing mature eucalyptus trees that will be removed by the proposed church development.

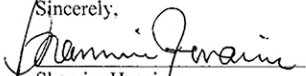
As stated in draft EIR and referenced in italics above this is the land that is surrounded by suburban homes and the only land left open from the surrounding developments. This land provides a serene and quite open space for the neighborhood. This portion of the land was planned for low-medium density residential uses (1 unit per 1-1.9 acres) but never approved. It was planned and protected from development due to the open space restrictions.

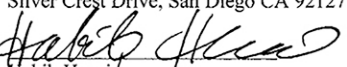
The Specific Plan Amendment 14-001 is proposed to allow for a Land Use for the Chinese Bible Church religious assembly use in Subarea V. If this proposed change for land use is allowed for constructing a wall of 40 feet high buildings, a height waiver for constructing tower elements 55 feet tall and installing outdoor audio system then it will be in conflict to the intent and community character of the SFVSP and a significant change from the current County of San Diego General Plan Regional Categories Map showing "Semi-Rural" land use for this site.

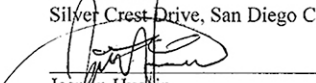
Allowing the Chinese Bible church to move forward with their plans will result in a higher density non-residential land use. This type of development will not only increase traffic, noise, light pollution and impacts on surrounding aesthetics, but will also have harmful effect, upon desirable neighborhood character of the surrounding homes and their respective property values.

Therefore we are opposed to the approval of the proposed Draft Supplemental EIR Chinese Bible Church of San Diego PDS2014-SPA-14-001, PDS2010-3300-10-037(MUP), PDS2012-3940-12-002(VAC), PDS2010-3910-9508007L(ER), SCH# 214011018.

Sincerely,

  
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**I-3-5** The comment states that the proposed sparsely distributed palm trees are not in character with the existing eucalyptus trees that will be removed. The Concept Landscape Plan (CLP) includes an extensive list of trees, shrubs, vines, and groundcover that will be used. Please see DSEIR Figure 1-9, Concept Landscape Plan Notes, for details of the planting palette. An analysis of the CLP was included on pages 2-12 and 2-13 of the Draft SEIR. 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. No further response is required.

**I-3-6** The comment concerns the character of the site in its existing condition. The comment states that the land is surrounded by suburban homes, and that it provides a quiet and serene open space for the neighborhood. The comment also states that the project site was planned for low-medium density residential uses and that the site has open space restrictions. The impact of the project on community character was evaluated in the DSEIR in Section 3.1.4.3. The comment does not raise any specific issue regarding the DSEIR; therefore, no more specific response can be provided or is required. However, General Response 1 in the Response to Comments provides an overview of the subject of land use and community character. This comment will be incorporated into the Final SEIR that will be provided to decision makers prior to a final decision on the project. No further response is required.

**I-3-7** The comment concerns the project's effects on the community character of the Santa Fe Valley Specific Plan (SFVSP). The comment addresses general subject areas, which received extensive analysis in the DSEIR. General Response 1 in the Response to Comments provides a response to the subject of community character. The project's consistency with the SFVSP is discussed in Section 3.1.4.3 of the DSEIR, page 3-72+. It was determined that the project, with the design measures proposed, does not have a significant impact on Land Use. 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-3-8** This comment states that the project will result in higher density non-residential use, as well as impacts to traffic, noise, light pollution, aesthetics, neighborhood character, and property values. The comment addresses general subject areas, which received extensive analysis in the Draft EIR. Please see General Responses 1, 2, and 4 "Planning and Land Use," "Biology and the Resource Protection Ordinance," and "Visual Resources," respectively for responses to the subjects of land use and community character, traffic, and visual effects, respectively. The comment is general so a more specific response is not required. Property values are not a topic of analysis under the California Environment Quality Act, therefore property values were not discussed in the DSEIR. 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 of the project.

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**I-3-9** The comment expresses opposition to the proposed project. The County acknowledges the comment letter, and notes it expresses general concerns for the project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, the County provides no further response to this comment. The comment will be made a part of the Final SEIR that will be provided to decision makers prior to a final decision on the project.