



Comments Letter

O-3-

San Diego County Archaeological Society, Inc.

Environmental Review Committee

23 September 2017

To: Ms. Marisa Smith
Department of Planning and Development Services
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, California 92123

Subject: Draft Supplemental Environmental Impact Report
Chinese Bible Church
PDS2014-SPA-14-001, PDS2010-3300-10-037, PDS2012-3940-12-002,
Log No. PDS2014-3910-95-08-007

Dear Ms. Smith

I have reviewed the cultural resources aspects of the subject DSEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DSEIR and its Appendices F and G, we have the following comments:

Regarding archaeological resources, the survey of the property occurred more than seven years ago. Therefore, being more than five years old, and considering the possibility that rainfall and other events may have altered the visibility of any buried resources, the property needs to be resurveyed.

Regarding built environment resources, specifically the Sim Bruce Richards-designed ranch house, significant new information requires a reconsideration of the evaluation of the impact of its removal by the project.

The original evaluation by Mr. Moomjian is presented in his report dated January 9, 2012. It states, on page 17 of Appendix G, "No examples of Richards' work have been designated by the County of San Diego, Historic Site Board (HSB). Consequently, he has not been afforded master architect status by the HSB." This wording is repeated in the DSEIR.

However, on November 14, 2016, the HSB voted to recommend the Frank & Jean Nichol Residence in Pauma Valley for landmarking and a Mills Act contract. The motion passed by the HSB specifically recognized Sim Bruce Richards as a master architect.

O-3-1

O-3-2

O-3-3

Response to Comments Letter

O-3-

O-3-1 The County of San Diego appreciates the comments on the Draft Supplemental Environmental Impact Report (DSEIR) by the San Diego County Archaeological Society (SDCAS). 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.

O-3-2 The comment states that the archaeological survey occurred more than seven years ago and, therefore, the project site should be resurveyed. The cultural resources study meets the County of San Diego Report Format and Content Requirements for Cultural Resources and is compliant with California Environmental Quality Act (CEQA) regulations. The study found that no archaeological sites were evident on the site. To ensure that resources that may be discovered during grading are protected, the DSEIR includes mitigation measure M-CR-1, which requires monitoring of the site by a qualified archaeological consultant during grading. 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.

O-3-3 The comment states that "significant new information" exists which justifies "reconsideration" of evaluating the proposed project's impacts to the ranch house within the project site. The ranch house was evaluated in the 2012 technical report (DSEIR Appendix G), where it is stated that the architect, Sim Bruce Richards, had not been afforded master architect status. The comment states that the Historic Site Board voted to recommend a separate structure, the Frank & Jean Nichol Residence, also designed by Sim Bruce Richards, for land marking status and a Mills Act Contract in 2016. Therefore the status of the ranch house should be re-evaluated in this light.

The County of San Diego, Historic Site Board (HSB) considered the voluntary, historic site designation nomination of the Frank and Jean Nichol Residence, located at 15405 Pauma Valley Road, Pauma Valley, California 92061 on October 17, 2016. During this meeting, the HSB voted to designate (landmark) the property based upon the findings documented in the *Historical Assessment Of The Frank & Jean Nicol Residence, 15405 Pauma Valley Road, Pauma Valley, California, 92061*, prepared by Scott A. Moomjian (September 2016). According to the study, the residence was designed in a Post and Beam style by architect Sim Bruce Richards for original owners, Frank and Jean Nicol in 1982. The home was

O-3-3

Cont.

found to be the last known completed residential design produced by Richards prior to his death in 1983, and was important because it “represents the last design of one of San Diego’s leading Modernist architects, produced over the course of a prolific and successful career” and “illustrates his creativity in the very last stage of his career.” Further, the structure possessed an extremely high degree of historic integrity.

The Motion approved by the HSB stated:

“Moved, that the Historic Site Board recommends the Frank & Jean Nichol Residence (APN #132-060-82-00), in the Pauma Valley community, be placed on the Local Register of Historic Resources as Landmark Number 2016-006. The resource is significant under Criterion V.(b)(3) of Ordinance 9493, as it represents the work of an important creative individual, Master Architect Sim Bruce Richards, and as it embodies the distinctive characteristics of a type, Post and Beam Construction.

The period of significance is 1982-1984.

The landmarking includes:

- The house
- The associated retaining walls
- The grove of six Chinese flame trees

The Historic Site Board also recommends the resource for participation in a Mills Act contract.

Although this residence is less than 50 years old, Section V.(d)(2) states (in part): ‘A resource less than 50 years old may be considered for listing in the Local Register if it can be determined that sufficient time has passed to understand its historical importance.’ The Historic Site Board (HSB) finds that, particularly as the last known complete work of Sim Bruce Richards, the resource qualifies for listing despite being less than 50 years old.”

The fact that the HSB designated the Nichol Residence establishing Sim Bruce Richards as a “master” architect, approximately four years after the Historical Resources Technical Report was completed, does not give rise to an adequate basis upon which to re-examine the Ranch House. This is due to the fact that the Ranch House, constructed in 1955, was previously found not to be a prime example of the work of architect Sim Bruce Richards because it lacks definitive features characteristic of his work; was found not to be of historical significance due to a lack of association with historic or cultural events; and does not possess original integrity due to numerous modifications and alterations. This stands in contrast to the Nichols Residence, designed in 1982, which is a rare, later, and much more intact example of Richards’ work.

Comments Letter

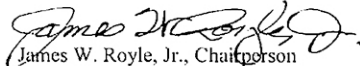
O-3-

We recognize that modifications have been made to the ranch house. However, the reversibility of those changes is not specifically addressed.

We recommend that the ranch house resource evaluation be updated. In addition, it should be presented to the HSB for consideration and evaluation.

Thank you for the opportunity to provide our comments as part of the public review of this project's environmental documents.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: Brian F. Smith & Associates
Scott A. Moomjian, Esq.
SDCAS President
File

O-3-4

O-3-5

O-3-6

Response to Comments Letter

O-3-

O-3-4 The comment states the Ranch House should be analyzed in terms of reversing the changes that have been made to the design. Such as analysis and whether changes potentially can be reversed is not a required element of evaluation in the Historical Resources Technical Report. It is also not relevant to whether the building is potentially significant under any eligibility criteria.

O-3-5 The SDCAS letter expresses the opinion that the Ranch House evaluation be updated. However, as addressed in Response O-3-3 above, there exists no basis upon which to do so. The letter further expresses the opinion that the Ranch House evaluation be "presented to the HSB for consideration and evaluation." While the duties and responsibilities of the HSB are codified in San Diego County Administrative Code Section 396.5(m), those actions do not include the independent review of historic evaluations absent associated, voluntary historic site nominations. 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.

O-3-6 This comment provides closing remarks for the letter and does not raise any issue related to the adequacy of any specific section or analysis of the Draft EIR. No further response is required.