

Subject: Opposition to All Peoples Church Project - Comprehensive Concerns

RE: PTS No. 636444, All Peoples Church

Dear Members of the San Diego Planning Commission,

We are writing on behalf of Save Del Cerro, a community group comprised of 500+ members who have actively opposed this project for the past 5+ years. Our opposition to this project is rooted in several substantial concerns that have arisen from our comprehensive review of the submitted documents, analysis of past City of San Diego reports and actions, and consultation with subject matter experts.

We hereby formally request that the San Diego Planning Commission **DENY** the All Peoples Church project's requested actions including: a General Plan/Community Plan Amendment (CPA) to modify the Navajo Community Plan; a Planned Development Permit (PDP) to allow a non permitted use in the underlying Base Zone; a Site Development Permit (SDP) to allow a Commercial Development and Use per SDMC 131.0110 and 131.0111(d) on environmentally sensitive land; the Revestment of Access Rights from College Ave due to insufficient site frontage and the intensive Land Use proposed; and various easement vacations not in the Public Interest.

We also request the Planning Commission determine that a reopening of the Environmental Impact Report to more thoroughly review the Traffic, Land Use and Project Alternatives that are currently deemed to cause No Significant Impacts, would be in the public interest.

Our request for DENIAL is based upon the following main discussion points:

- 1. Project Does Not Meet Community Plan Objectives and Comply With the Municipal Code**
- 2. Neglect of Housing Crisis**
- 3. Non-Compliance with the Navajo Community Plan**
- 4. Disproportionate Scale and Visual Disruption**
- 5. Traffic Study Accuracy and Overwhelming Intensity of Uses**
- 6. Project Alternatives That Ignore CEQA Guidelines**
- 7. Sequencing Violation**

1. Project Does Not Meet Community Plan Objectives and Comply With the Municipal Code

The Environmental Impact Report (EIR) No. 636444/SCH NO. 20211100394 and Mitigation Monitoring and Reporting have not established that the deviations requested from the applicable land use plan are preferable and would not adversely affect the applicable land use plan. It has failed to adhere to the Community Plan Objectives as shown by the strike through text in Table 5.1-2 on Page 400-402 of the EIR.

Community Plan

Table 5.1-2
NAVAJO COMMUNITY PLAN GOALS AND RECOMMENDATIONS CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
Principal Objective		
Maintain and Enhance the Quality of Existing Residences and Encourage the Development of a Variety of New Housing Types with Dwelling Unit Densities Primarily in the Low to Low-Medium Density Range as shown.	The project would involve the construction of a non-residential use on a residentially designated site. It does not propose new housing. The site and architectural design incorporate careful planning and sensitive development features which create a well-defined, balanced and visually coherent design that would maintain the quality of the surrounding residential neighborhood. The project would be consistent with this objective from the Community Plan.	Yes
Residential Element		
Promote a healthy environment by careful planning and sensitive development of well-defined, balanced and distinct communities which encompass a variety of residential density patterns and housing types.	The project would involve the construction of a non-residential use on a residentially designated site. The site and architectural design incorporate careful planning and sensitive development features which create a well-defined, balanced and visually compatible design that would maintain the quality of the surrounding residential neighborhood. Since the proposed church would not be inconsistent with the character of the neighborhood, as described in Section 5.5, <i>Visual Effects and Neighborhood Character</i> , the project would be consistent with this goal of the Community Plan.	Yes
Foster techniques of land development that will encourage imagination and variety in building site layouts, housing types, and costs, and that will capitalize on the unique topographic assets of the community. All housing developments within the study area should relate to existing topography in order to minimize grading and preserve the natural terrain of the area. The use of retaining walls, terraces, split level or cantilevered houses should be considered on steep terrain.	The proposed church/sanctuary structure would be situated in the topographic low point of the site near the College Avenue off-ramp from I-8 and setback from the adjacent, lower stature residential and commercial structures to the east and north, as shown in cross-sections contained in Chapter 3, <i>Project Description</i> , and Section 5.5, <i>Visual Effects and Neighborhood Character</i> . The parking structure would be recessed into the terrain such that its upper parking deck would be slightly below College Avenue and the surface parking lot would meet surrounding grades. The building placement and setbacks defined in the project site plan would suppress the proposed structures. Landscaping, such as trees and vining species in raised planter beds, would be installed throughout the property, including the upper parking deck and	Yes

Why are these important principal objectives of the Navajo Community Plan simply stricken from the Final EIR?

Additionally, the project does not meet the findings and the requirements of the following San Diego Municipal Codes:

SDMC Section 126.0601 Purpose of the Planned Development Permit Procedures

The purpose of these procedures is to establish a review process for development that allows an applicant to request greater flexibility from the strict application of the regulations than would be allowed through a deviation process. The intent is to encourage imaginative and innovative planning and to ***assure that the development achieves the purpose and intent of the applicable land use plan and that it would be preferable to what would be achieved by strict conformance with the regulations.***

SDMC Section 126.0505 Findings for Site Development Permit Approval

A Site Development Permit may be approved or conditionally approved only if the decision maker makes all of the findings in Section 126.0505(a):

- (1) The proposed development will not adversely affect the applicable land use plan;
- (2) The proposed development will not be detrimental to the public health, safety, and welfare; and
- (3) The proposed development will comply with the regulations of the Land Development Code including any allowable deviations pursuant to the Land Development Code.

As well, the supplemental findings in Section 126.0505(b) through (m) Supplemental Findings–Environmentally Sensitive Lands that are applicable to the proposed development as specified in this section.

Moreover, the project ignores the specific criteria established in the City’s 2015 Land Use and Community Planning Element, contravening crucial directives.

LU-C.3. Maintain or increase the City’s supply of land designated for various residential densities as community plans are prepared, updated, or amended.

The project will not increase the supply of land for residential densities, despite the underlying RS 1-7 zoning. The enormity of the development ensures that the land will never be utilized for residential purposes, should this project be granted approval.

LU-D.10. Criteria for Initiation of Amendments

Require that the recommendation of approval or denial to the Planning Commission be based upon compliance with all of the three initiation criteria as follows:

- a) the amendment request appears to be consistent with the goals and policies of the General Plan and community plan and any community plan specific amendment criteria;
- b) the proposed amendment provides additional public benefit to the community as compared to the existing land use designation, density/intensity range, plan policy or site design; and
- c) public facilities appear to be available to serve the proposed increase in density/intensity, or their provision will be addressed as a component of the amendment process.

The Planning Commission’s approval of the Initiation of Amendment in 2018 appears to have been an offer toward flexibility to the applicant to prove their

case. **We believe today that following the study of impacts through City Staff work and the production of an EIR, that the evidence is clear, they have not.** The project's objectives require a use and facility that is too intense for the both site and the Community, and in contradiction to the EIR, it does indeed create Significant Impacts in the Traffic and Land Use areas that are completely avoided by the currently entitled 24 unit housing project approved with mitigations by the City Council in December of 2017.

2. Neglect of Housing Crisis

In a time when California and the San Diego region grapple with an acute housing crisis, the proposed project stands as a testament to misguided priorities. Housing development has woefully lagged behind population growth, causing housing costs to skyrocket beyond the reach of ordinary citizens. In December 2017, the City Council had granted approval for the construction of 24 homes on this property, a decision that was both prudent and commensurate with the community's needs. The applicant has already twice been granted an Extension of Time (EOT) for this housing development. This Reduced Residential Development Alternative aligns perfectly with the City's unmet housing and greenhouse gas emission objectives.



3. Non-Compliance with the Navajo Community Plan

The 2015 Navajo Community Plan (NCP) stands as a principal document, a guiding beacon for the community's future development. It emphasizes the preservation of the community's residential character. The proposed project, however, departs from the NCP's guiding principles. It dismisses the need for sensitive development, inviting incompatible uses and disregarding the imperative to minimize conflicts with more intensive non-residential activities.

The applicant's disregard for the land's topography and its failure to integrate terracing into the design represent a direct contradiction of the Navajo Community Plan's directives, including promoting a healthy environment through sensitive development, preventing the encroachment of incompatible uses, and minimizing conflicts with more intensive non-residential uses. The project site's location and intended use contradict these objectives.

Quoted directly from the Navajo Community Plan:

- *The principal or overriding residential objective to guide the long-range development of Navajo is to: maintain and enhance the quality of existing residences and encourage the development of a variety of new housing types with dwelling unit densities primarily in the low to low-medium density range.*
- *Encourage the design of residential areas so as to prevent the encroachment of incompatible uses and minimize conflict (e.g., traffic noise) with more intensive non-residential uses.*
- *Foster techniques of land development that will encourage imagination and variety in building site layouts, housing types, and costs, and that will capitalize on the unique topographic assets of the community. All housing developments within the study area should relate to existing topography in order to minimize grading and preserve the natural terrain of the area. The use of retaining walls, terraces, split level or cantilevered houses should be considered in steep terrain.*
- *Prevent and/or limit development in proposed open space areas which serve to enhance community identity--steep slopes and canyons, floodplains, and areas with unique views and vistas.*

If approved, the massive scope of the project prohibits a future residential developer from using the land for housing, thereby contradicting the underlying residential zoning. Retaining the underlying RS 1-7 zoning, while simply allowing a "cross" to be added to the map on Figure 24 of the Navajo Community Plan is a de facto rezoning of the property, bereft of any legitimacy. In reality this project intends to create a Commercial Assembly Use into a Low-Density Residential Zone.

4. Disproportionate Scale and Visual Disruption

The project's deviation from Del Cerro's community identity is a source of concern. Rather than embracing the unique architectural diversity that defines the community, the project seeks to impose a uniformity connection to San Diego State University. A cursory review of the topographic site map shows the project pad is built on top of a 14-foot retaining wall, which appears to contradict claims about the structure being nestled into the topographic low point.¹

This incongruity could be seen as a redefinition of the charter of Del Cerro.

Furthermore, the excessive infrastructure improvements (examples below) demanded by this project are unwarranted for what is ostensibly a "small project." These demands point to a complete lack of alignment with the community's needs and an unnecessary burden on the existing infrastructure.

- A new dedicated traffic signal just 750 feet from the WB I-8 on/off-ramps and traffic signal.
- Two new dedicated turn lanes
- NB on College Ave. a second turn lane just 1,600 feet from the College Ave and Del Cerro Blvd traffic light
- Reducing lane widths to 11 feet
- Installing a Guardrail of 42"
- Remove 8.5' shoulder for use as right turn lane
- Reduce the existing lanes and make the Right turn lane 11' wide.
- Dedicate 5.5' ft additional R/W to provide a 6' bike lane and 6' Ped path.
- Widening will require filling up the slope behind the existing sidewalk

¹ The applicant has made public representations to the community that the proposed structure would be built below street-level and hardly visible to the passerby. The original EIR calls for a 6 ft perimeter wall above grade, but Table 3-1 Proposed Development Deviation (New EIR) requests a 20 ft retaining wall variance above grade. The proposed project is unclear regarding the following:

- What is the finished grade that the building starts at?
- Why does the retaining wall and finished grade pad start so high above grade line?
- What is the overall finished grade and finished grade to the top of the building and the top of the cross.

It looks like the building pad elevation is 390. This would put the bulk of the building (80 percent) at a elevation of 420 and higher, which is above the grade of 418.5 of the house located directly behind the proposed project (6301 Glenmont Street). According to the map at Figure 3-2, the bulk of the building would be 30 feet with the highest being 52'.25" plus the height of the cross.

Rendering vs. Reality

Proposed left turn lane rendering shows no slope. In reality there is still quite a bit of slope, forcing the traffic signal closer to the 8 Freeway.



Top row of images is from applicant's renderings

Bottom row are actual photos take from Google Street View

"As recommended in the Community Plan Residential Element policies, the project design is sensitive to the existing neighborhood as the church/sanctuary structure has been situated in the topographic low point"

- Final EIR RTC-10

"By placing the church/sanctuary building at the topographically lowest portion of the site, the project has been designed to minimize its intrusion into the nearby public vantage points, such as College Avenue."

- Final EIR RTC-14

"Nevertheless, the project's height, bulk, signage, or architectural projections would not result in a negative visual appearance due to its topographically-sensitive site layout, cohesive architectural styling, and below grade placement of retaining walls"

- Final EIR RTC-14

"Design the structures and site improvements to be sensitive to the existing topography and surrounding neighborhoods."

- Final EIR RTC-18

"Topographically, the project site is generally lower in elevation than College Avenue, the I-8 westbound off-ramp, and the surrounding neighborhoods and community"

- Final EIR 2-1

None of these claims from the Final EIR are supported in the below images provided by the applicant. In some areas the building pad is set 20-30' above the topographic low

point of the lot, and is above the I-8 West off ramp and parts of College Ave. adjacent to the project. By their own admission (via images submitted to the community group), this project is hardly “nestled into the topographic low point”.



From bottom of College Avenue offramp



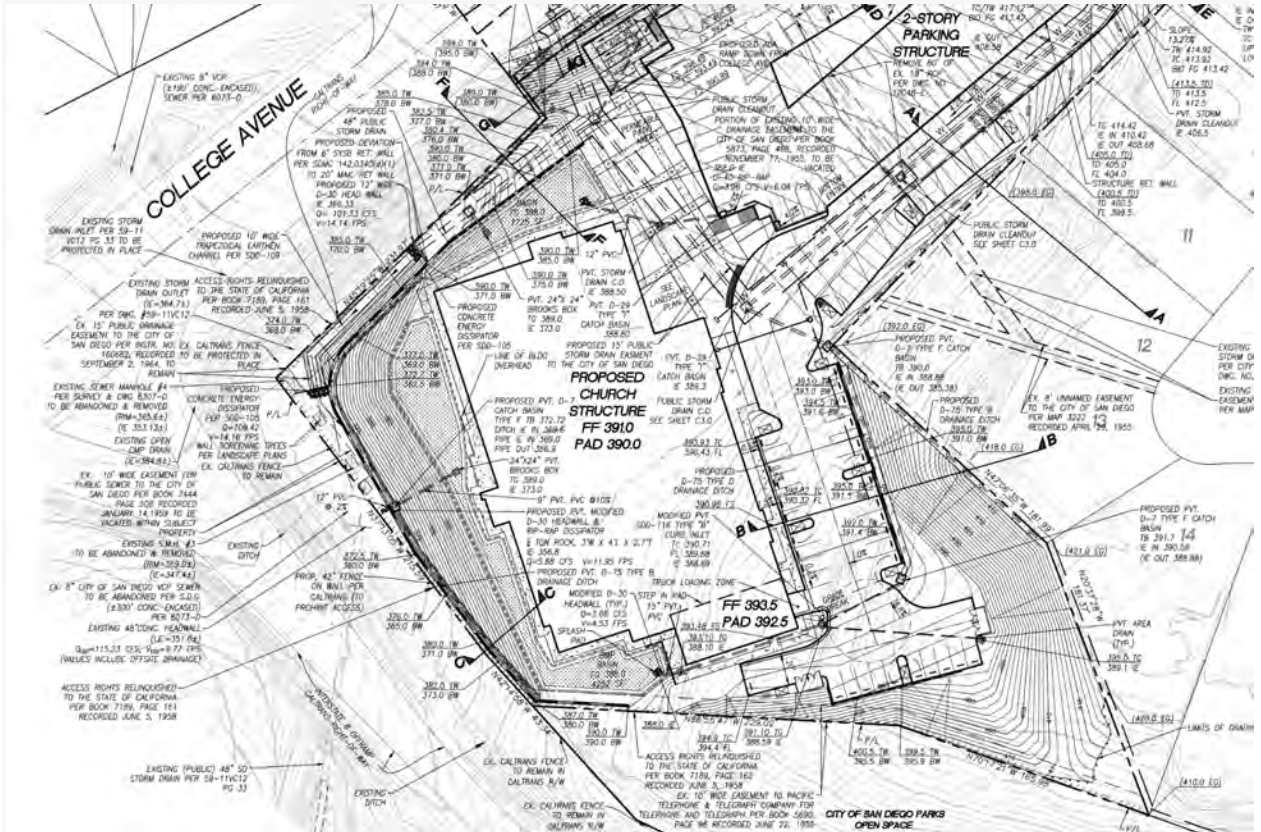
From College Avenue – south end



From College Avenue offramp



From College Avenue toward Plaza



**Table 3-1
PROPOSED DEVELOPMENT DEVIATIONS**

Development Regulations	Required	Proposed
Maximum Building Height Limits [San Diego Municipal Code (SDMC) §131.0431(b)]	30 feet above grade	53 feet above grade (limited to architectural projections only)
Maximum Wall Height Limits [SDMC §142.0340(d)(1)]	6 feet above grade	20 feet above grade
Minimum Building Side Yard Setbacks [SDMC §131.0431(b)]	84 feet, 2 inches	14 feet
Long-Term Bicycle Parking	16 spaces	3 spaces

5. Traffic Study Accuracy and Overwhelming Intensity of Uses

The credibility of the traffic study is weak, as it was completed several years ago and omits the growth experienced over the past few years within the applicant’s programming and the surrounding community. Acknowledging the Commissioners are not able to speculate on future use, we submit the following. Crucial applicant activities, programming, and events have been inexplicably omitted, leading to a gross underestimation of potential traffic consequences.

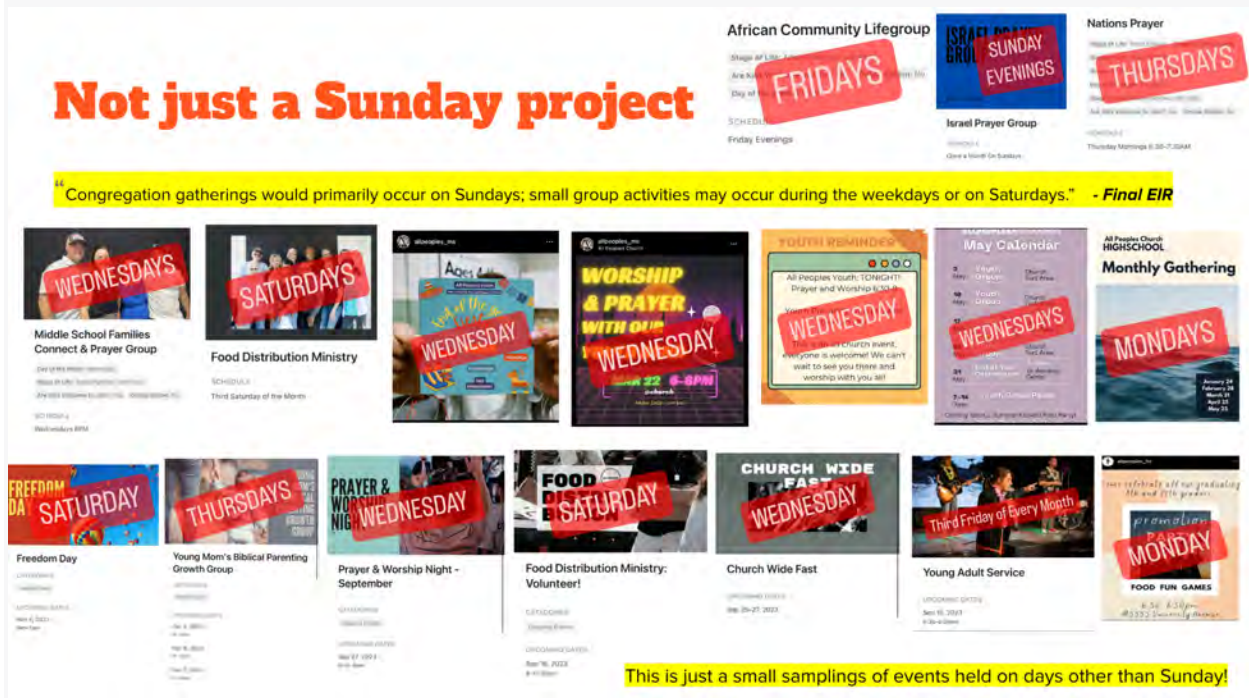
This is significant, as the project may exceed the threshold for a small project category and instead should require a more comprehensive Vehicle Miles Traveled (VMT) analysis. The applicant has submitted via their traffic study and published in the EIR (page 7-28) “project would result in 280 weekday ADT, with 31 a.m. peak hour trips and 107 p.m. peak hour trips.”

Table 1: Weekday Project Trip Generation

WEEKDAY (Mon-Thur, Pastoral offices closed Friday)	Rate, Size & Units	ADT	Weekday AM Peak Hr			Weekday PM Peak Hr			
			% & Total	Split IN	OUT	% & Total	Split IN	OUT	
<u>City of San Diego Trip Rate</u>									
House of Worship	5 /KSF		4%	0.8	0.2	8%	0.5	0.5	
	52.585 KSF	263	10	8	2	22	11	11	
<u>Applicant Forecasted Uses</u>									
Staff 9am-6pm (up to 30)		120		30	0		0	30	
Highest weekday bible study (avg. 75)		150		0	0		75	0	
Basketball gym (avg. 5 users)		10		1	0		1	1	
		280	31	31	0	107	76	31	
Highest volumes used for analysis:			280	31	31	0	107	76	31

Source: City of San Diego Trip Generation for weekday and site specific data for forecasted use. ADT - Average Daily Traffic; Split-percent inbound & outbound. Excel rounding may cause values to be slightly higher or lower than whole number.

A review of the applicant's website and social media pages reveals an extended list of weekday (and Saturday) gatherings. This includes their "Schools" (School of Transformation, School of Leadership, and School of Deployment), which in one example shown portrays 38 "graduates" of their 10-month long program which meets twice per week. Taken from the applicant's website is a small sampling of their events, showing at least 20 ongoing weekday events (from all groups to large school gatherings). The number of weekday activities would seem to exceed 280 weekday trips (and these figures do not include the necessary vendor trips and maintenance crews that are consistently required to service and maintain a building with landscaping of this magnitude. Think cleaning, garbage, recycling, landscaping.)



The estimation of 0-10 weekday trips for the proposed 7,000 square foot basketball court/gymnasium is what stands out to us as one of the most concerning underestimations of Average Daily Trips in the traffic study. The applicant has consistently promoted the basketball gym as being for "youth/community sport" (see

image below from one of the community presentations). As basketball is a team sport that requires many players per team, two teams to play (just a single game). Both Allied Gardens Recreation Center and San Carlos Recreation Center basketball leagues have been incredibly popular over the years. We are concerned the usage of 0-10 ADT for the gymnasium was chosen as an attempt to keep ADT for the project under 300, and thus retaining the “small project” status.

Basketball Gym with No Use?

“The basketball gym is proposed to be open during Pastoral office hours anticipated to have between 0 and 10 users (with an average of 5 gym users assigned for the trip generation resulting in 10 ADT with 1 AM trip and 2 PM trips).” - *Final EIR Traffic Study*



7,000 sf multi-purpose gym with expected 0-10 ADT?



Slide from community presentation

Closed on Friday improves ADT calculation

“The site-specific trip generation is based on the existing and forecasted weekday use of the Church facilities.

Existing Pastoral offices located at 5555 University Avenue are open Monday-Thursday from 9AM to 6PM and closed on Fridays with a current staff of 8 to 25 persons. The proposed Pastoral offices are to be open Monday-Thursday from 9AM to 6PM and **closed on Fridays with 25 to 30 anticipated staff.**” - *LOS Traffic Analysis (April 2021)*

- Should they ever choose to open on Fridays, which makes sense for a growing congregation with a goal of attracting thousands of students from SDSU, undoubtedly the Average Daily Trips assumptions are massively understated.
- Adding Friday increases these assumptions by a minimum of 17% and brings ADT >300, thus no longer qualifying as a Small Project.
- If approved, will the applicant agree to the condition of remaining closed on Fridays going forward?

Additionally, during the August 2023 Navajo Community Planners meeting, Pastor Herber admitted that they do not have any idea of how many congregants they currently have. They “do not keep count.” How can the traffic study be accurate if they admittedly do not have any idea of their congregation size?

The Reduced Residential Alternative (RRA), with an estimated 260 Average Daily Trips (ADT), is similar to the current applicant’s projections of 280 (ADT). The approval of the RRA by a Process 5 City Council vote in December 2017 rejected the installation of a traffic signal across College Ave. The request for a traffic signal by the applicant, with only a slightly higher projected ADT than the RRA, raises serious questions about the project's intentions.

Project applicant's traffic engineer (LOS Engineering) presented in a community meeting that 95 percent of their daily trips will head south, away from the community.



The traffic study's fixation on daily driveway trips as the sole metric for assessing transportation impact is flawed. It overlooks the broader transportation network, fails to account for trip length, ignores trip purpose, and lacks sensitivity to variations in assumptions or inputs. It is an inadequate measure of the project's true impact and fails to consider the environmental and mitigation aspects adequately.

Here's why:

Inadequate for Network Effects:

Traffic doesn't exist in isolation. It's part of a larger transportation network where interactions between different roads and routes can influence congestion, travel times, and overall efficiency. The focus on driveway trips doesn't account for how these trips interact with the existing road network.

Doesn't Consider Trip Length:

A focus on driveway trips doesn't provide insight into the distance covered by vehicles. It's possible for a development to generate a relatively small number of trips but with longer distances, resulting in higher cumulative vehicle miles

traveled (VMT). This is especially true when 95% of the applicant's members reside outside of the community.

Ignored Trip Purpose:

The study might not differentiate between trips made for different purposes, such as commuting, shopping, or recreational activities. Different trip purposes can have varying impacts on traffic patterns and congestion.

Limited Use of SANDAG Model:

The study mentions that a SANDAG travel demand model is not available for Sunday analysis. However, this limits the study's ability to comprehensively analyze traffic impacts during weekend services.

Presumption of Lesser Impact:

While the study concludes that the project has a less than significant transportation impact, this conclusion relies on the project meeting certain criteria. The applicant's current weekday programming schedule illustrates data not captured by these criteria that warrant a more detailed analysis.

Limited Future Projections:

The study focuses on the year 2022 for project opening. However, a more comprehensive analysis should consider longer-term effects, especially since the project goals and the area's characteristics might change over time. We understand that CEQA guidelines do not allow for speculation, however, with the benefit of hindsight, we can demonstrate a significant change in scale and scope of the project since the traffic study was completed. This does not require the Commissioners to speculate.

Benefit of hindsight, not speculation

"Speculation on potential uses beyond what has been proposed by the applicant are hypothetical in nature and not reflective of the application, design and site plan submitted to the City and the project design analyzed in the DEIR. CEQA Guidelines Section 15145 prohibits speculation in an environmental analysis." - Final EIR

As the project applicant began this process in 2018, we have nearly 5 years of actual data for which the Planning Commission can evaluate the accuracy of the applicant's plan assumptions. **No speculation is required.**



Original Traffic Study was completed in April 2021, however...

- SDSU enrollment
 - Fall 2021 (30,865) vs. current (35,723) = **16% increase**
- Proposed project size scope and creep
 - 2018 (500 congregants) vs. current (1100+) = **120% increase**
 - 2018 (40,000 sf) vs current (54,476 sf) = **36% increase**
 - 2018 (10 classrooms) vs current (12) = **20% increase**
 - 2018 (300 parking spaces) vs. current (367) = **22% increase**
- Intensity and Usage
 - 2018 (a Sunday church) vs. current (gatherings 6 days a week)

The traffic study does not reflect this **ACTUAL** growth

Lack of Sensitivity Analysis

The study doesn't discuss how variations in assumptions or inputs might affect the outcomes. A sensitivity analysis could provide a more robust understanding of potential uncertainties.

6. Project Alternatives That Ignore CEQA Guidelines

Per the Environmental Impact Report, "According to CEQA Guidelines Section 15126.6, "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project ..."

The Project Alternatives discussion in Section 8 is insufficient, misleading and stretches the letter of the law to the breaking point. For example, the required No Project Alternative at Section 8.4.1 is titled in a misleading way, "No Project/No Development Alternative". The applicant also states within it "No Institutional development would be constructed on site" when none is allowed or proposed. Due to the fact that the site has an "Approved with Mitigations" entitlement approved by the City Council in 2017, CEQA requires discussion of this project under the No Project Alternative section, but it is not.

Additionally, Section 8.3.3 "No Project/Existing Community Plan", speculates on what type of project could be built on this site and continues to speculate as to the number of vehicle trips that this project might generate and the impacts it might have. Again, this should be part of the discussion under Section 8.4.1 No Project Alternative.

The applicant has chosen to provide discussion of the 2017 Approved Project under the misleading title of "Reduced Residential Development Alternative". Significantly, a

Community Plan Amendment is not required as the Approved Project is consistent with the existing Zoning and Land Use designations and adheres to the objectives of the Navajo Community Plan by having proposed a project that is sensitive to the characteristics of the site while building a low density neighborhood that blends into the adjacent single family homes.

The applicant's project requires a dedicated new traffic signal and major infrastructure improvements under the Local Mobility Analysis in spite of its attempt to qualify for an exception as a Small Project using ADTs. More speculation is proffered within Section 8.4.2.1 Land Use, where the applicant discusses Land Use-Noise Compatibility Criteria for the Approved with Mitigations Project. Equating the applicant's height and bulk deviations with the approved project's consistency with the LDC regulations and Community Plan objectives in terms of Less than Significant impacts to Neighborhood character is false and misleading.

The Reduced Project Alternative which only offers a reduction of 37 parking spaces, without any further substantial changes to the project, cannot pass as a reasonable alternative. The standard for determining whether an alternative should be analyzed in an EIR is whether the alternative is *potentially* feasible and should then undertake the comparison of the environmental effects of the project and alternatives.

A reduction in the number of classrooms and elimination of the gym would appear to be two possibilities worthy of further analysis. Replacing the two level parking garage with surface parking and encouraging carpooling and mass transit use would be another option worth considering.

7. Sequencing Violation

We respectfully ask the Planning Commissioners to scrutinize whether a gross violation of sequencing has occurred concerning the applicant's acquisition of a single-family home on Marne Ave., situated in immediate proximity to the project site. This acquisition, ostensibly for sewer easements, raises troubling questions about the integrity of the project's intentions. This single family home was strategically purchased by the applicant's developer out of necessity to gain sewer rights (rather than request them from Caltrans).



In light of these concerns, Save Del Cerro appreciates the San Diego Planning Commissioners meticulous evaluation of the All Peoples Church project. **We implore you to DENY the requested actions.** We firmly believe that a development more harmonious with the city and community's needs should be pursued.

Thank you for your consideration of our concerns.

Sincerely,

- Michael Livingston*
- Mardine Davis*
- Josh & Ricki Billauer*
- Nate & Lisa Stein*
- Barbara Blakely*
- Eduardo & Geraldine Luna*
- Pam Cotta*
- Joe Colloca*
- & 500+ other members of the Save Del Cerro group*



Save Del Cerro

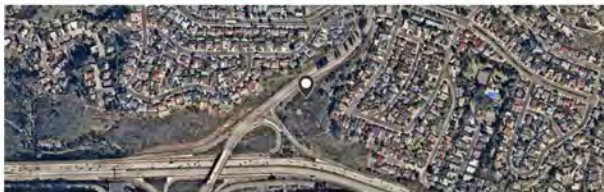


All Peoples Church
Project No: 636444

City of San Diego Municipal Code & Crisis



Unfortunately, your project is prohibited at this location.



ZONING DETAILS

Zoning Clearance

Prohibited

Prohibited means that your planned use is either specifically disallowed in this zoning district, or that the code is "silent." The best next step is to submit an inquiry below.

Zoning District

Residential - Single Unit (RS-1-7)

131.0403.a - The purpose of the RS zones is to provide appropriate regulations for the development of single dwelling units that accommodate a variety of lot sizes and residential dwelling types and which promote neighborhood quality, character, and livability. It is intended that these zones provide for flexibility in development regulations that allow reasonable use of property while minimizing adverse impacts to adjacent properties.

131.0403.b.1 - RS-1-7 requires minimum 5,000-square-foot lots

Land Use Code

Assembly and Entertainment Uses, Including Places of Religious Assembly

141.0602 - This use category applies to facilities designed to accommodate at least 25 people at a time for recreation, physical fitness, entertainment, or other assembly including places of religious assembly. Assembly and entertainment uses are permitted as a limited use in accordance with Process One in zones indicated with an "L" in the Use Regulations Tables in Chapter 13, Article 1 (Base Zones) and are subject to the regulations in Sections 141.0602(a) and (b). Assembly and entertainment uses may be permitted with a Conditional Use Permit decided in accordance with Process Three in zones

POLITICS

Housing crisis prompts first joint San Diego county-city meeting in decades



Housing should be the highest and best use of these 6 prime acres.

San Diego 'significantly undersupplied' in land for housing, report shows



Research firm Zonda said San Diego is one of the most undersupplied markets for new housing lots. Pictured: A Father Joe's subsidized housing project under construction in East Village. (Jarrod Valliere / The San Diego Union-Tribune)

Benefit of hindsight, not speculation

“Speculation on potential uses beyond what has been proposed by the applicant are hypothetical in nature and not reflective of the application, design and site plan submitted to the City and the project design analyzed in the DEIR. CEQA Guidelines Section 15145 prohibits speculation in an environmental analysis.” - Final EIR

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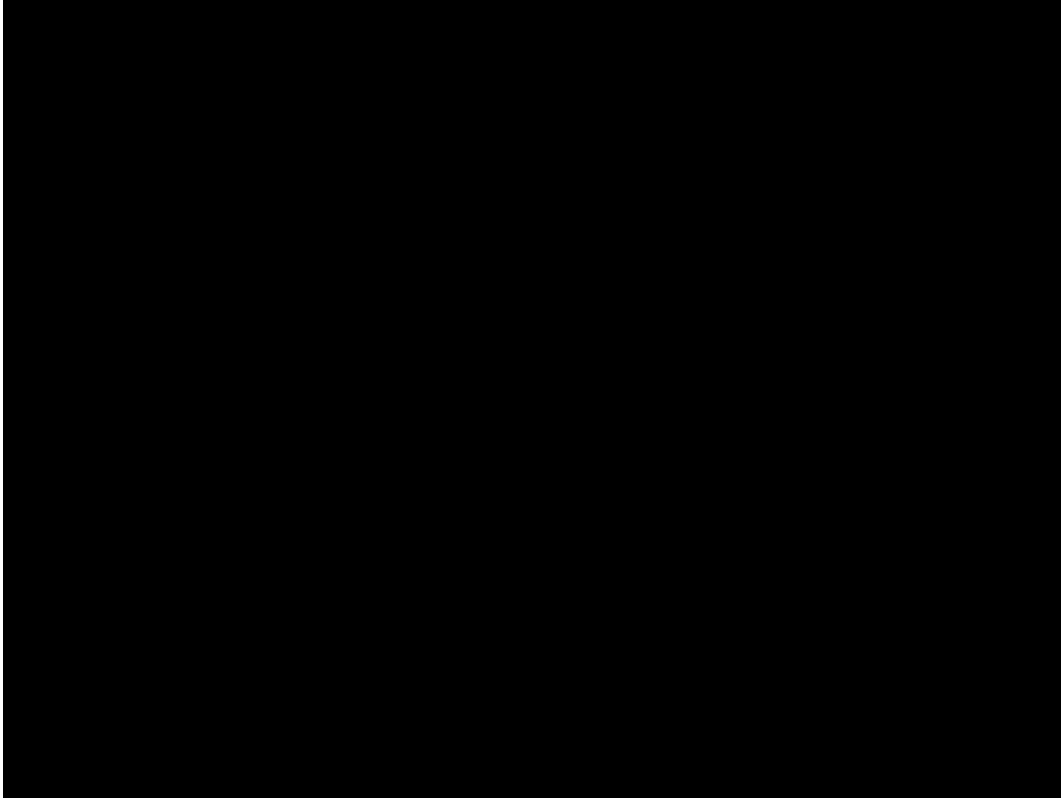


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The traffic study does not reflect this **ACTUAL** growth

Current average weekday traffic Sept. 2023

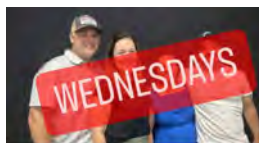


VIDEO



Not just a Sunday project

“ Congregation gatherings would primarily occur on Sundays; small group activities may occur during the weekdays or on Saturdays.” - **Final EIR**



Middle School Families Connect & Prayer Group

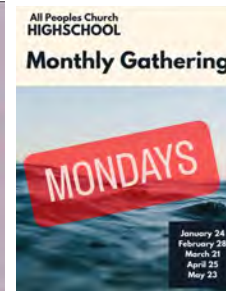
Day of the Week: Wednesday
 Stage of Life: Adults/Families (with kids)
 Are Kids Welcome to Join?: Yes | Online Option: No

SCHEDULE
 Wednesdays 6PM



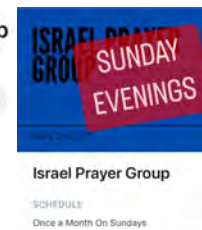
Food Distribution Ministry

SCHEDULE
 Third Saturday of the Month



African Community Lifegroup

Stage of Life: Adults/Families (with kids)
 Are Kids Welcome to Join?: Yes | Online Option: No
 Day of the Week: Friday
 SCHEDULE
 Friday Evenings



Nations Prayer

Stage of Life: Youth Groups
 Are Kids Welcome to Join?: No | Online Option: No
 Day of the Week: Thursday
 SCHEDULE
 Thursday Mornings 6:30-7:30AM



Freedom Day

CATEGORIES
 Festival Event
 UPCOMING DATES
 Nov 4, 2023
 9am-5pm



Young Mom's Biblical Parenting Growth Group

CATEGORIES
 Special Event
 UPCOMING DATES
 Oct 5, 2023
 9-11am
 Nov 9, 2023
 9-11am
 Dec 7, 2023
 9-11am



Prayer & Worship Night - September

CATEGORIES
 Ongoing Events
 UPCOMING DATES
 Sep 27, 2023
 6:30-8pm



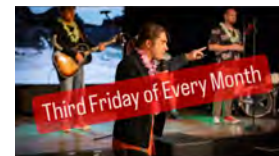
Food Distribution Ministry: Volunteer!

CATEGORIES
 Ongoing Events
 UPCOMING DATES
 Sep 16, 2023
 8-11:30am



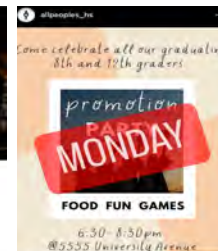
Church Wide Fast

UPCOMING DATES
 Sep 25-27, 2023



Young Adult Service

UPCOMING DATES
 Sep 15, 2023
 6:30-8:30pm



6:30-8:30pm
 @5555 University Avenue

This is just a small samplings of events held on days other than Sunday!

Closed on Friday improves ADT calculation

“The site-specific trip generation is based on the existing and forecasted weekday use of the Church facilities. Existing Pastoral offices located at 5555 University Avenue are open Monday-Thursday from 9AM to 6PM and closed on Fridays with a current staff of 8 to 25 persons. The proposed Pastoral offices are to be open Monday-Thursday from 9AM to 6PM and closed on Fridays with 25 to 30 anticipated staff.” - LOS Traffic Analysis (April 2021)

- Should they ever choose to open on Fridays, which makes sense for a growing congregation with a goal of attracting thousands of students from SDSU, undoubtedly the Average Daily Trips assumptions are massively understated.
- Adding Friday increases these assumptions by a minimum of 17% and brings ADT >300, thus no longer qualifying as a Small Project.
- If approved, will the applicant agree to the condition of remaining closed on Fridays going forward?

Additionally, during the August 2023 Navajo Community Planners meeting, applicant admitted that they do not have any idea of how many congregants they currently have. They “do not keep count.” How can the traffic study be accurate if they admittedly do not have any idea of their congregation size?

What about Volunteers?

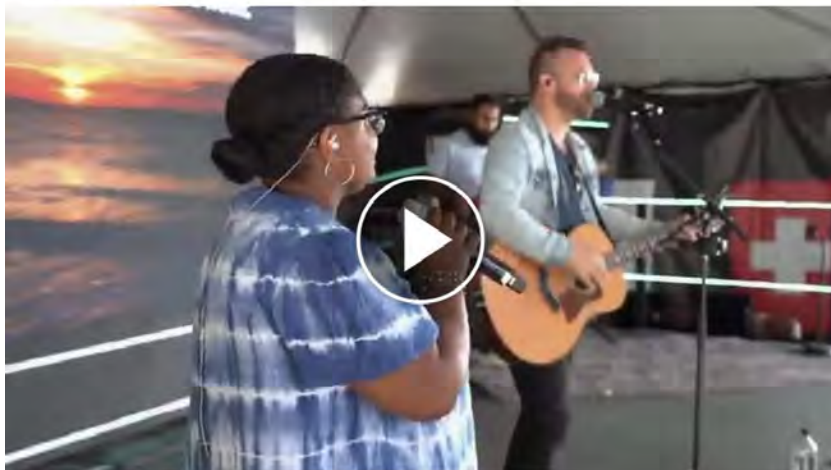


All Peoples Church

May 26 at 1:34 PM · 🌐



Did you know it takes more than 50 volunteers to run one of our Sunday worship services? In this video, Jason takes us around campus to meet some of the people who serve us every weekend.



Admittedly they require “more than 50 volunteers” per Sunday service. How are these numbers factored into the ADT projections?

ALLPEOPLESCHURCH



Preferred Volunteer Area *

Parking Lot Team (directing traffic) "We out here are saving people's lives... literally."

Greeting Team (meeting and welcoming members and guests) "BONJOUR, HOLA, GUTEN TAG, CIAO, OLA, NAMASTE, SALAAM, ZDRAS-TVUY-TE, JAMBO, SHALOM"

Usher Team (warmly greeting, seating, and assisting our members and guests) "How many in your Holy Ghost Party?"

Safety Team (create and maintain a safe atmosphere for our members and guests) "Unlike at Buckingham Palace, these guys can smile"

Connect Team (helping people connect to all peoples church) "I hadn't made that connection before!"

Facilities Team (preparing and polishing our space for people to encounter Jesus) "If Jesus was an All Peoples Church volunteer, He'd probably serve here."

95% of projected traffic leaves Del Cerro

Project Trip Assignment

- 95% of project traffic travels to/from the south
- 5% of project traffic travels to/from the north.



- This is not a community project.
- These projected numbers run counter to the City's Climate Action Plan
- Adjacent Bus Route 14 does not run on Sundays
- Questionable "small project" designation and these projected trip assignments would warrant a full VMT Analysis

When is a school not a school?

Applicant is proposing 12 classrooms, already has “schools” promoted on website, hosts several 10 month long programs with dozens of “students”. **“No primary educational school spaces are proposed as part of the project.” - Final EIR**

“The proposed Church will not offer a day care or a children’s school during weekdays, thus the City’s House of Worship without school or daycare trip rate was applied for this comparison.” - Final EIR Traffic Study



Original plans only showed 5 classrooms, now 12!

SCHOOL OF DEPLOYMENT

TWO TRACKS-ONE GOAL: to train and equip leaders to fulfill their life purpose wherever God is calling.



All Peoples School of Leadership 2023
📍 SAN DIEGO, UNITED STATES | AUG 21 - DEC 18

School? MONDAYS
The School of Leadership is now accepting applications for the Fall semester. This school is designed for those who want to grow in their life as a leader, ministry leader, community leader, or a future church planter, this school is your next step to unlock your leadership potential.



School of Transformation 2023-2024

📅 AUG 25 - JUN 15

ABOUT THE SCHOOL OF TRANSFORMATION

The School of Transformation is 10-Month Discipleship Training School affiliated with All Peoples Church in San Diego, CA. In the

School?

Basketball Gym with No Use?

“The basketball gym is proposed to be open during Pastoral office hours anticipated to have between 0 and 10 users (with an average of 5 gym users assigned for the trip generation resulting in 10 ADT with 1 AM trip and 2 PM trips).” - *Final EIR Traffic Study*

THE LIGHT PROJECT – FEATURES

- 900-seat sanctuary
- 12 classrooms for Sunday School and church programs
- 363 parking spaces (structured and surface parking)
- **Basketball gym for youth/community sports**
- Prayer room
- Outside space for fellowship and coffee
- Office/administrative space

LET THERE BE LIGHT



7,000 sf multi-purpose gym with expected 0-10 ADT?

PROGRAMS
YOUTH SPORTS, MARRIAGE AND FAMILY,
CRISIS COUNSELING

HOSTING
HOSTING COMMUNITY EVENTS
AND PUBLIC FORMS

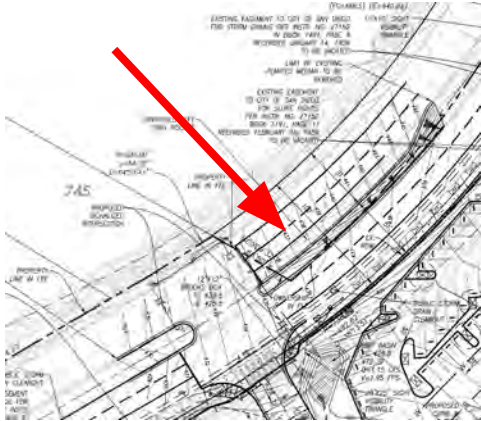
Slide from community presentation

How can the applicant propose youth/community sports, yet suggest the ADT for this would be 0-10?

This low estimate allows the project to come in <300 ADT and qualify as a **“Small Project”**

Rendering vs. Reality

Proposed left turn lane rendering shows no slope. In reality there is still quite a bit of slope, forcing the traffic signal closer to the 8 Freeway.



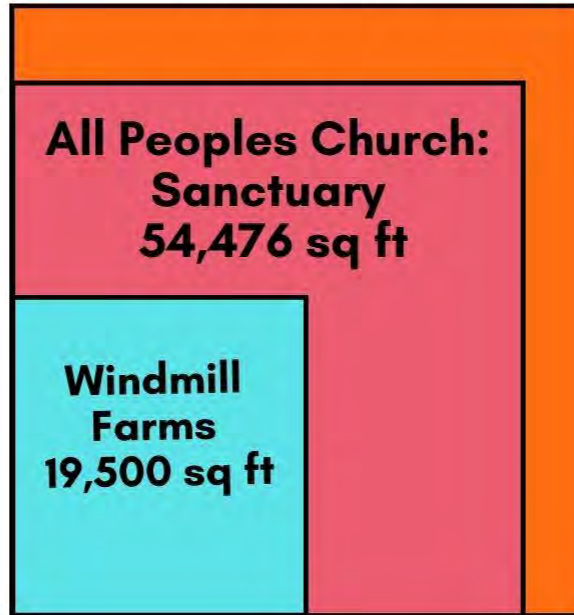
Misleading Rendering: Median slope missing

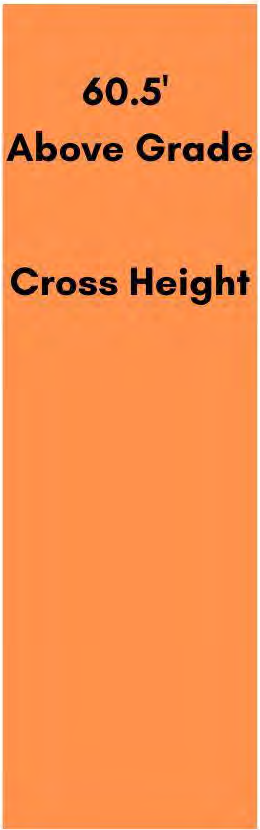
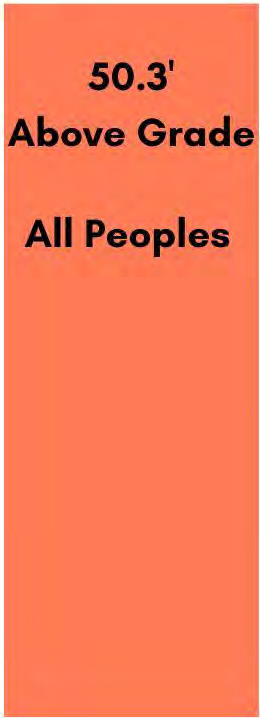


Reality: Slope affects left turn lane



**All Peoples Church:
Parking Structure
71,010 sq ft**





Community Plan

Table 5.1-2

NAVAJO COMMUNITY PLAN GOALS AND RECOMMENDATIONS CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
Principal Objective		
Maintain and Enhance the Quality of Existing Residences and Encourage the Development of a Variety of New Housing Types with Dwelling Unit Densities Primarily in the Low to Low-Medium Density Range as shown.	The project would involve the construction of a non-residential use on a residentially designated site. It does not propose new housing. The site and architectural design incorporate careful planning and sensitive development features which create a well-defined, balanced and visually coherent design that would maintain the quality of the surrounding residential neighborhood. The project would be consistent with this objective from the Community Plan.	Yes
Residential Element		
Promote a healthy environment by careful planning and sensitive development of well-defined, balanced and distinct communities which encompass a variety of residential density patterns and housing types.	The project would involve the construction of a non-residential use on a residentially designated site. The site and architectural design incorporate careful planning and sensitive development features which create a well-defined, balanced and visually compatible design that would maintain the quality of the surrounding residential neighborhood. Since the proposed church would not be inconsistent with the character of the neighborhood, as described in Section 5.5, <i>Visual Effects and Neighborhood Character</i> , the project would be consistent with this goal of the Community Plan.	Yes
Foster techniques of land development that will encourage imagination and variety in building site layouts, housing types, and costs, and that will capitalize on the unique topographic assets of the community. All housing developments within the study area should relate to existing topography in order to minimize grading and preserve the natural terrain of the area. The use of retaining walls, terraces, split level or cantilevered houses should be considered in steep terrain.	The proposed church/sanctuary structure would be situated in the topographic low point of the site near the College Avenue off-ramp from I-8 and setback from the adjacent, lower stature residential and commercial structures to the east and north, as shown in cross-sections contained in Chapter 3, <i>Project Description</i> , and Section 5.5, <i>Visual Effects and Neighborhood Character</i> . The parking structure would be recessed into the terrain such that its upper parking deck would be slightly below College Avenue and the surface parking lot would meet surrounding grades. The building placement and setbacks defined in the project site plan would suppress the proposed structures. Landscaping, such as trees and vining species in raised planter beds, would be installed throughout the property, including the upper parking deck and	Yes

Table 5.1-2
NAVAJO COMMUNITY PLAN GOALS AND RECOMMENDATIONS CONSISTENCY EVALUATION

Applicable Elements, Goals, and Recommendations	Consistency Evaluation	Consistent (Yes/No)
	along the façade of the parking structure, to soften and screen views. In addition, planting areas, with densely spaced trees and shrubs would be provided between parking areas and site perimeters to further soften views of the project. Therefore, the proposed grading, siting, landscaping, building articulation, roof treatments and other architectural design features would collectively provide visual interest and break up the massing of the structures such that the project would be consistent with this goal from the Community Plan.	
Encourage the design of residential areas so as to prevent the encroachment of incompatible uses and minimize conflict (e.g., traffic noise) with more intensive nonresidential uses.	The proposed church/sanctuary and associated parking facilities have been sited to take advantage of the topographic differences that currently exist on site by placing the most intensive activities associated with the daily operations in the southwestern corner of the property in the lowest topographic area of the site below the adjacent residences to minimize the potential for noise. Primary vehicular access to the project and the parking structure would be via a full access driveway connected to a new signalized intersection along College Avenue to minimize traffic conflicts. Architectural articulation and features (i.e., arches) have been integrated into the design to provide visual interest. Extensive landscaping, including screening along the common property line with the nearby residential yards, is proposed to conceal and soften views of facilities, walls and rooftops, as described in Section 5.5, <i>Visual Effects and Neighborhood Character</i> . The project design is consistent with this policy.	Yes

Why are these important principal objectives of the Navajo Community Plan simply stricken from the Final EIR?

Navajo Community Plan

Street Widening & Medians

Widening and realignment frequently destroys the visual character and identity of streets by the removal of mature trees, other landscaping, and median strips. The approach to street widening and realignment should be more sensitive to the character of the street and the quality of adjacent development.



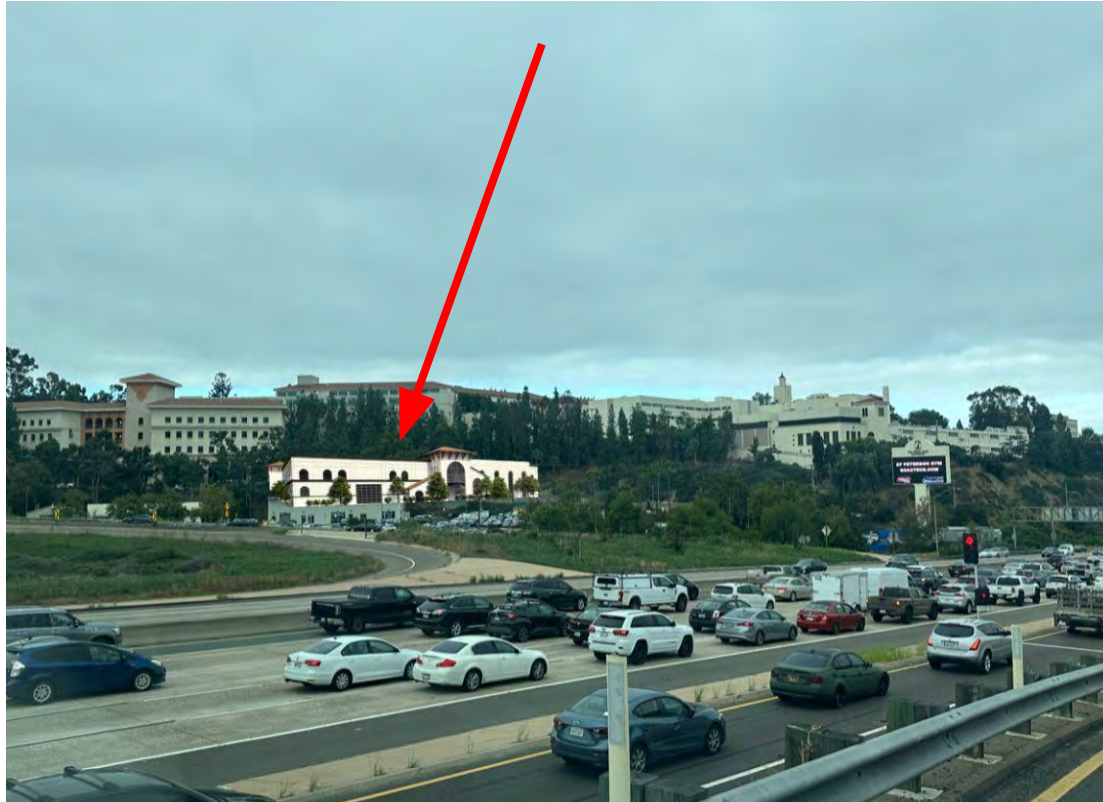
Objective

"TO PRESERVE AND ENHANCE THE NATURAL BEAUTY AND AMENITIES OF THE NAVAJO COMMUNITY"

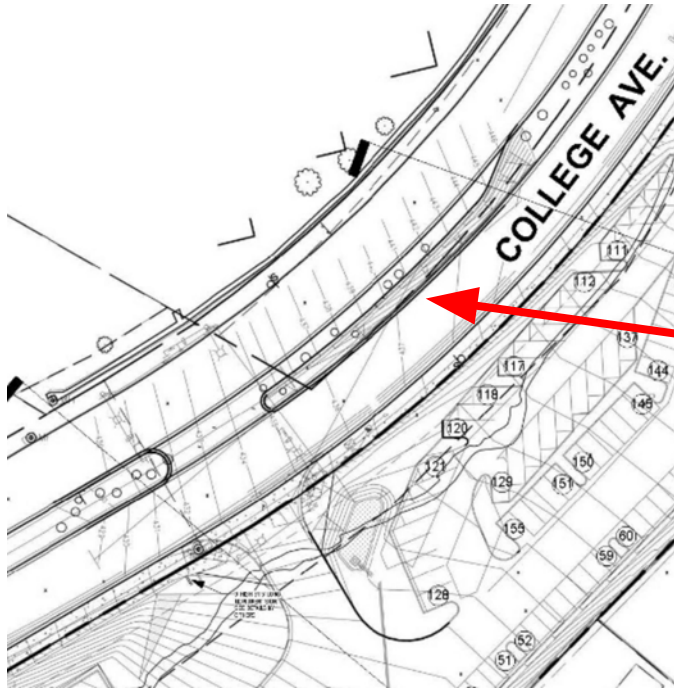
Proposal

Protect distinct areas and communities from intrusion and encroachment of incompatible uses.

Project is designed to mimic SDSU



Signalized Driveway Challenges



Existing slope between NB and SB College Ave. would make a left turn lane into the project more challenging than illustrated in the traffic study, potentially forcing it closer to the I-8 Freeway and removal of even more mature pine trees.

Signalized Driveway Concerns



The proposed signalized intersection and dedicated turn lanes are dangerously close to this sweeping blind curve on S/B College Ave. Shown previously, this stretch is regularly backed up from I-8 to Del Cerro Blvd, which creates a potentially hazardous blind approach to the new signal.

Cumulative Impact



The proposed signalized intersection would be the 6th traffic signal between Del Cerro Blvd. and Canyon Crest Dr., a span of 0.50 miles.

Potential Conditions

- No lighted cross
- Install cross below highest point of building
- Decrease size of building
- Deny setback variance
- Reduce finished top grade to below existing houses on Marne and Glenmont
- No school (of any type)
- No monetization of parking lot for any events (e.g. SDSU, Snapdragon, etc.)
- No sports leagues on rec court (since VMT is 0-10)
- No exterior amplified sound
- Gates to be locked during all non-operational hours
- Traffic management plan required for all large events (holidays)
- No construction activity on College Ave or Del Cerro Blvd during rush hour traffic (7am-9am and 4pm-6pm) Monday - Friday
- Require installation of fully mature trees for screening purposes.
- **What else???**

Tyler Sickmeyer
333 C Street, Suite 202
San Diego, CA 92101

Re: Support for All Peoples Church: The Light Project - September 28, 2023 Agenda

Dear Members of the San Diego Planning Commission:

My name is Tyler Sickmeyer, a small business owner in San Diego, and I'm writing to share my support for The Light Project, a new permanent home for All Peoples Church. Their presence in our community reach far beyond their church walls. They have been serving the community at-large, offering teen programs, offering food drives, crisis counseling, support local businesses, as well as provide many volunteer hours to better those around them.

This decision isn't about whether you share All Peoples Church beliefs or not, it is a decision about approving land use. The diversity of religious beliefs in our country and county is what makes the US and San Diego so special. We are grateful for religious freedom and there is room in Del Cerro for people to gather, worship, and provide resources to our local community.

I urge you to support this project. Thank you for your cooperation and understanding that this support means much to many.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tyler Sickmeyer', written in a cursive style.

Tyler Sickmeyer

San Diego Planning Commission,

As a resident of the city of San Diego, I strongly support the Light Project. Churches such as All Peoples have benefited our communities through their outreach programs. Social events to keep teens out of crime, food and clothing drives, teen programs, teen pregnancy support, crisis counseling, drug rehab, supporting local businesses, and creating programs to benefit the homeless, refugees, and welfare recipients are all benefits to the Navajo community that will come from All Peoples Church having a place at this property.

This land-use issue is a benefit to San Diego city and unfortunately it is often those who religiously or theologically disagree with a church's belief that try to stand in the way of a church benefiting its community. There is room in San Diego to support all faiths and diversity is our strength. All Peoples Church has a great mission to serve the Navajo community and I urge you to support this project to help benefit our communities.

Thank you for your support,

Stacie Crenshaw

A handwritten signature in cursive script that reads "Stacie Crenshaw". The signature is written in black ink and has a long, sweeping horizontal stroke at the end.

San Diego City Resident

September 18, 2023

RE: Support for All Peoples Church: The Light Project – September 28, 2023 Agenda

Dear Members of the San Diego Planning Commission,

I am writing to share my support for The Light Project, a new permanent home for All Peoples Church.

All Peoples Church is a community church, both in its size and its actions. Its congregation and the proposed church building are similar in size to hundreds of other houses of worship throughout the city that have successfully served their communities for decades. Churches are important elements of our neighborhoods and they provide benefits to both their congregants and the community-at-large, including teen programs, food drives, crisis counseling, support for local business, and serving as a place for people to gather and socialize. All Peoples Church is committed to community service, volunteering thousands of hours to many causes in the community and beyond.

It's important to note that the decision about whether to approve the church project is a land use matter, not one decided by whether you share the church's beliefs. The diversity of religious beliefs in our country is one of its greatest strengths and we all believe strongly in our right to religious freedom. There is room in our communities for all faiths to have space of worship.

I urge you to support this project.

Sincerely,



Diana Borja Ferreira
8724 Washington Ave
La Mesa, CA 91942
(619) 755-6067

September 18, 2023

RE: Support for All Peoples Church: The Light Project – September 28, 2023 Agenda

Dear Members of the San Diego Planning Commission,

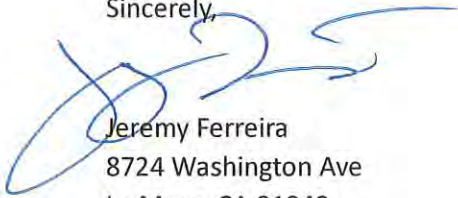
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I urge you to support this project.

Sincerely,



Jeremy Ferreira
8724 Washington Ave
La Mesa, CA 91942
(619) 857-6701

Dear Members of the San Diego Planning Commission,

Hello! I hope this letter finds you all well, my name is Emma Schroeder, I am a 22-year old college student, and I wanted to write your committee to express my support for the All Peoples Church: The Light Project on behalf of other college students, ranging from Point Loma Nazarene University, UCSD, and SDSU.

Firstly, I would like to clarify any misconceptions and state that All Peoples Church is not a megachurch. The size of the Light Project building proposal is in similar size/scale to other houses of worship in our community. With that said, All Peoples Church is akin to a community gathering place - a home. I first joined All Peoples Church my freshman year of college, now I am currently a senior, and looking back at all four years, it is this church community that has been the best part of college. There is a lot of pressure ~~from~~ on college students, whether it is from academics, careers, finances, etc. and it is easy for kids/young adults in this stage to feel isolated, overwhelmed, and crack under all the pressure. This is why All Peoples Church has been such a blessing in my own, and my friends' lives. The Light Project will provide shelter to college students who are looking for community; it will be a gathering place where college students can engage in giving back and serving different communities of San Diego. I grew up relatively sheltered, but I found so much joy in serving at food drives or the homeless communities through All Peoples Church with other college students who are passionate about giving back to the people of San Diego. I believe that the Light Project will only give us a home to continue serving out of.

Thank you all for ^{your} time, I really appreciate it.

Best regards,

Mina Schroeder

ecschröder4@icloud.com

619-948-9949

3900 Lomaland Dr.

San Diego, CA 92106

If you have any questions on The Light Project from a
college-student-perspective, I would love to answer any
questions.

Dear Members of the San Diego Planning Commission,

I am writing you, to let you know that I support All Peoples Church: The Light Project - September 28, 2023 agenda.

The Light Project is well designed. It will have minimal traffic impact. The buildings are attractive and the landscaping is sensitive to the community and will beautify the entrance to Del Cerro.

This property has long been vacant and attracts homeless encampments, litter and presents fire hazards. Building the church will remove those hazards. The church will keep it well-maintained and increase neighborhood safety.

Sincerely,

Christine Fowler

5428 Gilbert Dr. San Diego 92115

Custer, Sabrina

Subject: FW: MIHWG update and housing opportunity
Attachments: Screenshot 2023-08-25 at 3.15.40 PM.png

Dear MIHWG, esteemed Council Members, and Mayor Gloria,

In an effort to help you with your stated mission to identify housing opportunities during this extreme housing crisis, we'd like to provide an update on 6 acres of prime RS 1-7 zoned land in the heart of San Diego (at the intersection of 8 Freeway & College Ave).

As one of your near term goals is to "**Catalogue Publicly and Institutionally Owned Land**," we submit to you the 6 acre parcel at 5555 1/2 College Ave. This 6 acre RS 1-7 zoned parcel was approved by City Council for a housing development in December 2017, but less than a week later ownership was transferred to the All Peoples Church so they could pursue approval for the development of a 54,000 sq foot monolithic mega church (rather than build the approved housing). Believe it or not, one of your very own MIHWG members is actually the land-use and lobbying representative for this mega project.

Additionally, as one of the stated goals for MIHWG is to "**Identify Additional Revenue for Housing**," we submit that ensuring that housing is built on this lot will contribute significant revenue (\$300,000 to \$600,000+ annually and growing) to the City in the form of property taxes (while the project seeking approval on this parcel would pay \$0 in property tax in perpetuity).

Earlier this week, the Navajo Community Planners (CPG for this area), **unanimously voted to DENY** the proposed non-residential mega project. Attached you can read the full motion that was put to the board for vote.

The community of Del Cerro is **supportive of the approved housing development**. We encourage you all to continue to support (and deny) projects that help (or hinder) you all from attaining your stated objectives, especially those that involve continuing to make every available effort to build more housing.

You can read more about the originally approved project here: <https://www.sandiego.gov/sites/default/files/pc-17-066.pdf>

"Housing Impact Statement: The 5.99-acre project site can accommodate a maximum of 52 dwelling units based on the underlying RS-1-7 Zone. The project proposes to provide 24 market rate single dwelling units, where none currently exist, adding to the housing supply in the City. The applicant would pay the Inclusionary Affordable Housing Fee to support the San Diego Housing Commission's development of affordable unit in accordance with San Diego Municipal Code (SDMC) Section 142.1304."

Thank you for your continued volunteer efforts.

Save Del Cerro

The Navajo Community Planners, Inc. as the representative of the residents of the Navajo Communities makes its recommendation on the application of All Peoples Church as follows:

The Navajo Community Planners, Inc. concludes that the applicant has not established the factual findings required by Municipal Code Section 126.0505(a) in that:

1. The development will adversely affect the Navajo Community Plan because the development will be detrimental to public health, safety, and welfare, and
2. The development will not result in a more desirable project than would be achieved if designed in strict conformance with the developmental regulations of the applicable zone.
3. The development is not consistent with the Community Plan.

The Navajo Community Planners, Inc. recommends denial of the permit.

Dear Mayor Gloria,

It is with enthusiasm that the 22 members of your Middle-Income Housing Working Group propose to you our recommended actions for consideration.

We are grateful to you for forming this ad-hoc working group and charging us with assisting you in moving ideas forward to alleviate San Diego's middle-income housing crisis and we sincerely hope that our recommendations – which represent the consensus view of a diverse range of community interests – will help move San Diego forward. I am personally grateful to my colleagues for their diligence and hard work throughout this process.

Given the work the San Diego Housing Commission is doing on *preservation* of affordable housing – both income-restricted and naturally occurring – our recommendations are focused on ideas we believe will help stimulate additional *new production* of middle-income housing for both owners and renters.

We began with a series of sessions that focused on recent policy changes at the state and local level as well as the role that private and philanthropic capital can play in alleviating the problem.

We then broke into four committees: policy, finance, land, and labor/building technology. These four committees met several times and deliberated on the attached recommendations. At the end of the process, the committees reconvened and reached consensus on the proposed recommended actions.

Our recommended actions fall into three categories:

- Recommended actions for consideration
- Recommended Mayoral advocacy on items that are beyond the city's control
- Recommended Mayoral convenings of stakeholders to further discuss how to move certain items forward

I want to acknowledge the diligence, devotion, and timeliness of city staff in helping the Working Group. Elyse Lowe, Director of the Development Services Department, and Mike Hansen, former Director of the Planning Department, were generous with their time and informed our policy discussions immeasurably. Emily Piantoni, a former intern in your office, provided significant logistical and note-taking support. And I cannot thank your Director of Policy, Jessica Lawrence, enough. Jessica worked with me and the Working Group every step of the way to ensure a timely and meaningful set of recommendations.

On behalf of my colleagues, thank you again for the privilege of serving on this Working Group.

We look forward to determining next steps in collaboration with City staff to ensure the implementation of our recommendations.

Sincerely,

Bill Fulton
Chair, Middle Income Housing Working Group

MIDDLE-INCOME HOUSING WORKING GROUP
SUMMARY OF RECOMMENDATIONS

Charge: What can the city and other stakeholders in San Diego do to encourage the development of new housing affordable to middle-income residents?

Middle-income is defined as 80-150% of Area Median Income. In San Diego, this means household incomes of between approximately \$75,000 and \$140,000, depending on household size.

Recommended Actions for Consideration

Near-Term (Less than 2 Years)

- **Catalogue Publicly and Institutionally Owned Land** | Housing developers cannot easily identify appropriate properties suitable for middle-income housing developments. The City should better catalogue all publicly and institutionally owned land that could be made available for middle-income housing, including opportunities to provide housing and air rights above existing public facilities.
- **Revise Fee Structure** | Existing City development fee structures result in delays, inequitable investments, and inefficient processes. The City should update various fees, including development impact fees, water and sewer fees, and the Regional Transportation Congestion Improvement Program, especially in TPAs.
- **Expand Complete Communities** | The existing Complete Communities requirements do not adequately incentivize middle-income housing. The City should consider a 100% Middle-Income alternative to Complete Communities with a higher percentage of base density units dedicated towards middle-income households without very low- and low-income requirements.
- **Reform Stormwater Compliance Programs** | Existing stormwater regulations limit the amount of developable land that can be constructed because permits require a lot of land. The City should consider stormwater reform to focus on larger basins and mitigation to encourage small projects and prepare a robust alternative compliance program.
- **Modernize Construction Materials and Technology Code** | New construction materials and modern technology have the potential to reduce housing construction costs. The City should update local code to account for new construction materials and technology, such as panelization, mass timber, and full pre-fabrication. Additionally, streamlining for new construction materials should be considered, possibly in exchange for labor standards.
- **Improve Historic Review Practices** | Existing historic preservation criteria are generous and slow the pace of middle-income housing development. The City should provide a ministerial solution for historic review, allow ministerial mitigation for non-architectural historic resources, and consider other process improvements that balance historic preservation and housing development.

Medium-Term (Over 2 Years)

- **Transform Development Services Department** | The Development Services Department is in critical need of additional resources. Staff has made commitments to fill positions and address the backlog, but without priority attention and assistance on this department, San Diego cannot and will not deliver housing at the scale and impact levels we need.
- **Implement Vacancy Tax** | Many housing units across the City sit vacant. The City should consider a vacancy tax with revenue dedicated to funding for middle-income housing.
- **Identify Additional Revenue for Housing** | The City does not have an adequate revenue stream to subsidize middle-income housing development. The City should consider new funding sources, including trash fees, to subsidize deed restricted middle-income housing.

Recommended Mayoral Advocacy

Advocate for:

- Creation of a Construction Loan Guarantee Program
- Property tax abatements or reductions for middle-income housing, including a potential welfare real estate tax exemption for middle-income
- Robust Community Land Trusts
- Additional construction defect liability reform for condominiums
- Philanthropic funds to acquire middle-income housing
- Adapted State Density Bonus Laws to encourage more middle-income housing
- Training and apprenticeship programs focused on implementing new technologies
- San Diego Housing Commission to set aside and/or create funds for Middle Income Housing Loans through the Mayor’s original AB 1637 program (expired January 1 – sunset extension in process)
- Deep financial analysis/case study to show effectiveness of MIHWG proposals

Recommended Mayoral Convening

Convene:

- Stormwater alternative compliance workshop
- Developers, designers, contractors, and labor regarding new construction materials and technology
- Philanthropy, business, and other stakeholders around middle-income housing fund
- Developers and SDG&E on expediting housing projects
- MIHWG quarterly to discuss implementation of MIHWG recommendations

- **Identify Additional Revenue for Housing** | The City does not have an adequate revenue stream to subsidize middle-income housing development. The City should consider new funding sources, including trash fees, to subsidize deed restricted middle-income housing.

Staff Response: Staff agrees that additional funding would be pivotal in providing middle-income housing development in the City, and will work to identify funding, as well as priorities and actions for such a funding stream.

Challenge



Between 2010 and 2020, the City of San Diego needed to plan for **15,462** moderate-income homes to meet demand. Only **37** moderate-income homes were constructed.

*Units that exceed an income category do not count toward the RHNA progress but do add to the City's housing stock.

ALL PEOPLES CHURCH
Instructions for Planning Commission Letters

Thank you for your willingness to submit a letter of support for The Light Project, a new permanent church for All Peoples Church. The project will be heard by the San Diego Planning Commission on Thursday, September 28. Below are instructions for submitting your letter, along with some template letters of support for your use.

How to Submit Your Letter

Letters can be submitted online via the city's website or by U.S. mail.

Online form: <https://www.sandiego.gov/planning-commission/agenda-comment-form>

This link will take you to a form to fill out to share your comments. Here is a screenshot of what the form looks like:

Planning Commission Public Comment Form

*Indicates a required field.

Contact Info

First Name * NORMA Last Name * MENDENHALL

Email * CANANA1@AOL.COM Phone * 619-888-3967

Address * 6650 GLIDDEN City * SAN DIEGO

State * CA Zip * 92111

Meeting Info

Meeting Date *

Month 9 Day 28 Year 2023

Comment Type *

Agenda Comment

Non-Agenda Comment

Comments

200 words remaining

We bought this property 4 1/2 yrs ago - This will be good for Del Cerro.

- Enter your name, email, phone number, and address
- Enter the meeting date of September 28, 2023
- Click "Agenda Comment"
- Enter your support message of no more than 200 words
- Online comments must be received by 7:00 a.m. on the day of the meeting

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*Indicates a required field

Contact Info

First Name *	Last Name *
ROBERT	MENDENHALL
Email *	Phone *
RM PROGAS@gmail.com	(619)244-5816
Address *	City *
6650 GLIDDEN ST.	SAN DIEGO
State *	Zip *
CA.	92111

Meeting Info

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September 18, 2023

Support for All Peoples Church: The Light
Project-September 28, 2023 agenda

My name is Kathleen Botticelli I live at 7955 San Carlos Dr San Diego Ca 92119

Dear members of the San Diego Planning Commission,

I am a resident of the Navajo community and I support The Light Project proposed by All Peoples Church.

This property has long been vacant and attracts homeless encampments, litter, and presents potential fire hazards. Building the church will remove those hazards. The church will keep it well-maintained and increase neighborhood safety.

The Light Project is well-designed. It will have minimal traffic impact and the buildings have been carefully placed on the site to minimize visual impacts on adjacent neighbors. The project's extensive landscaping is both sensitive to the community and will beautify the entrance to Del Cerro.

All Peoples Church is a community church, both in its size and actions. Its congregation and the proposed church building are similar in size to other houses of worship in our community, including St. Therese Catholic Church and Temple Emanu-El, both of which have been successfully serving the community for decades. Churches are beneficial to this community and All Peoples Church is no exception. They are committed to community service, volunteering thousands of hours to many causes in the community and beyond.

I welcome them to the Navajo community and urge you to support the project.

Sincerely Kathleen Botticelli.

TO: City of San Diego Planning Commission

FROM: Rene Robinette, A resident of San Diego

I am writing to share my support for The Light Project, a new permanent home for All Peoples Church.

All Peoples Church is a community church, both in its size and its actions. Its congregation and the proposed church building are similar in size to hundreds of other houses of worship throughout the city that have successfully served their communities for decades.

Churches are important elements of our neighborhoods and they provide benefits to both their congregants and the community-at-large, including teen programs, food drives, crisis counseling, support for local businesses, and serving as a place for people to gather and socialize. All Peoples Church is committed to community service, and volunteers thousands of hours to many causes in the community and beyond.

It's important to note that the decision about whether to approve the church project is a land use matter, not one decided by whether you share the church's beliefs. The diversity of religious beliefs in our country is one of its greatest strengths. We all believe strongly in our right to religious freedom. There is room in our communities for all faiths to have space to worship.

I urge you to support this project.

Thank you.

D. Rene Robinette
10543 Sunset Ridge Dr.
San Diego, CA 92131

Sept. 17 2023

Mildred Valdez
6691 Jackson Dr.
San Diego, CA 92119

City of San Diego Planning Commission
1222 First Ave. MS 501
San Diego, CA 92101

Subject: Support for All Peoples Church - Light Project - Sept. 28 agenda

Dear Members of the San Diego Planning Commission,
I live in the San Carlos neighborhood and am in support of building the new facility for All People's Church, The Light Project. We have been a part of this church as a family since 2015 and know it is not a "mega church". As a military spouse I find great need and value for my children and family to have the support & resources available that APC provides. The Light Project has been carefully & prayerfully designed to minimize visual impacts on adjacent neighbors. This is a land use matter and not one of forcing beliefs on others. Having and embracing diversity of religious beliefs is a gift for our community. There is room for all faiths to worship in San Diego and specifically this area.

Thank you!

Respectfully,

M S Valdez
Mildred S. Valdez

Support For All Peoples Church: The Light Project 9/18/23
- September 28th, 2023 agenda

Dear San Diego Planning Commission,

I want to share my support of the Light Project, & fully believe that All People's church will be a huge support & benefit to the Del Cerro community. They dedicate thousands of hours to help or assist people of all backgrounds with food drives, crisis counseling, teen programs, help for the displaced, hurting & needy individuals & so much more.

I believe the land use will bring great reward if The Light Project is allowed to build. The plans are well designed & traffic will not be impeded.

I urge you to support this project & benefit Del Cerro by allowing this to be built.

Our business is close to this area & will be benefitted by this church.

Susan Edwards
619-894-2031
PO Box 502726
San Diego, CA 92150