



The County of San Diego

Planning Commission Hearing Report

Date:	February 28, 2025	Case/File No.:	Bradley Court Convalescent Center; PDS2021-MUP-053W2; PDS2021-ER-21-14-004
Place:	County Conference Center 5520 Overland Avenue San Diego, CA 92123	Project:	Major Use Permit Modification to Expand an Existing Skilled Nursing Facility and add an Adult Residential Facility
Time:	9:00 a.m.	Location:	675 E. Bradley Ave in El Cajon, CA 92021
Agenda Item:	#6	General Plan:	Village Residential (VR-24)
Appeal Status:	Appealable to the Board of Supervisors	Zoning:	Rural Residential (RU)
Applicant/Owner:	Thomas Jurbala, Applicant	Community:	Lakeside Community Plan Area
Environmental:	Mitigated Negative Declaration (MND)	APN:	387-142-36-00

A. OVERVIEW

The purpose of this report is to provide the Planning Commission with the information necessary to consider the proposed Major Use Permit (MUP) Modification, and environmental findings prepared in accordance with the California Environmental Quality Act (CEQA).

The Bradley Court Convalescent Center Major Use Permit Modification Project (Project) is a request to expand the existing Bradley Court Convalescent Center located on a 3.4-acre lot in the community of Lakeside. Currently, the facility consists of two skilled nursing buildings with 56 beds. The Project includes the construction of two new buildings with 97 new beds. One of the buildings is an Adult Residential Facility (ARF) and includes 66 new beds. An ARF is a non-medical facility that provides room, meals, housekeeping, supervision, storage and distribution of medication, and personal care assistance with basic activities like hygiene, dressing, eating, bathing and transferring. This level of care and supervision is for people who are unable to live by themselves but who do not need 24-hour nursing care. The ARF will be regulated by the Department of Health Care Services (HCS). The other new building is for skilled-nursing care and includes 31 beds. The Skilled Nursing Facility would be regulated by the California Department of Public Health (CDPH). Once completed, the site would include a total of four buildings and 153 beds. The Project also includes associated site improvements for the proposed expansion.

The sections contained in this report describe the following: development proposal, analysis and discussion, community planning group and public input, CEQA compliance, and the Planning & Development Services (PDS) recommendation. PDS analyzed the Project for consistency with the

General Plan, Zoning Ordinance, and other applicable regulations, policies and ordinances. Specifically, when processing an MUP, the County Zoning Ordinance requires that Findings be made for a project's compatibility with surrounding land uses. This includes the bulk and scale of a project, the availability of adequate facilities, the suitability of the site, the generation of traffic, and any potential harmful effect on the desired neighborhood character.

PDS found the project to be compatible with the surrounding land uses (as detailed in this report) and found the Project to be consistent with all applicable regulations, policies and ordinances with the inclusion of conditions in the Form of Decision (Attachment B). The Planning Commission is asked to consider the Project and either approve the Project as submitted, approve the Project with modifications, or deny the Project. Based on the analysis of the Project, staff finds that the required compatibility findings can be made, the Project will have no harmful impact on the neighborhood, and staff can recommend approval of the Project.

B. REQUESTED ACTIONS

This is a request for the Planning Commission to evaluate the proposed MUP Modification for the expansion of the existing Skilled Nursing Facility and the addition of an Adult Residential Facility. Staff also requests that the Planning Commission determine if the required findings can be made and, if so, take the following actions:

1. Adopt the Environmental Findings which includes the adoption of a Mitigated Negative Declaration (MND) (Attachment C).
2. Grant Major Use Permit Modification PDS2021-MUP-85-053W2, make the findings, and include the requirements and conditions as set forth in the Form of Decision (Attachment B).

C. PROJECT BACKGROUND

On September 6, 1974, the San Diego County Planning Commission approved a special use permit for the Bradley Sanitarium/H. A Perkins Application (P74-108) to authorize modifications to an existing legal non-conforming use and the continued operation of a legal non-conforming rest home. This permit expired in September 1976.

On May 27, 1977, the Planning Commission approved a special use permit for the Bradley Sanitarium (P77-14) to authorize "an existing rest home and psychiatric facility and modifications thereto" with a maximum capacity of 68 beds.

On July 7, 1978, the Planning Commission denied an application for a revision to the previously approved special use permit. This revision was for the addition of a two story, 66-bed family care facility to the existing 56-bed nursing home and a time extension of one year. The Planning Commission's denial was appealed to the Board of Supervisors and on July 28, 1978, the Board of Supervisors approved the addition of the 66-bed, two story building and the time extension.

On August 22, 1985, the San Diego County Planning and Environmental Review Board (PERB) approved the Vista del Cerro Convalescent Center (MUP-85-053) for the expansion of the existing "convalescent hospital" with 29,219 square foot addition having 99 beds and 39 parking spaces. The Major Use permit was approved with a Negative Declaration which had one mitigation measure for noise.

On December 4, 1986, a modification to this Major Use Permit (MUP-85-053W1) was approved to delete a 1.73-acre area from the Major Use Permit.

D. REGIONAL SETTING AND PROJECT LOCATION

The Project site is located within the Lakeside Community Planning Area on an approximately 3.4-acre site (Figure 1 and Figure 2). The project site is bound by East Bradley Avenue to the north, North Mollison Avenue and Greenfield Drive to the east and south, and Sams Hill Road to the west. The project site is located approximately 0.4 mile east of State Route 67, in an area of the County surrounded by the City of El Cajon and south of the City of Santee. The project site is in a developed area with mobile home residences (RMH) across East Bradley Avenue to the north; multi-family residences (RU and RV) to the south, southeast and west; and commercial (C32) uses and the San Miguel Fire Station to the east.

The project site has a gentle rising slope from north to south, rising from an elevation of approximately 442 feet at the northern portion of the entrance to approximately 470 feet at the southern portion of the site.

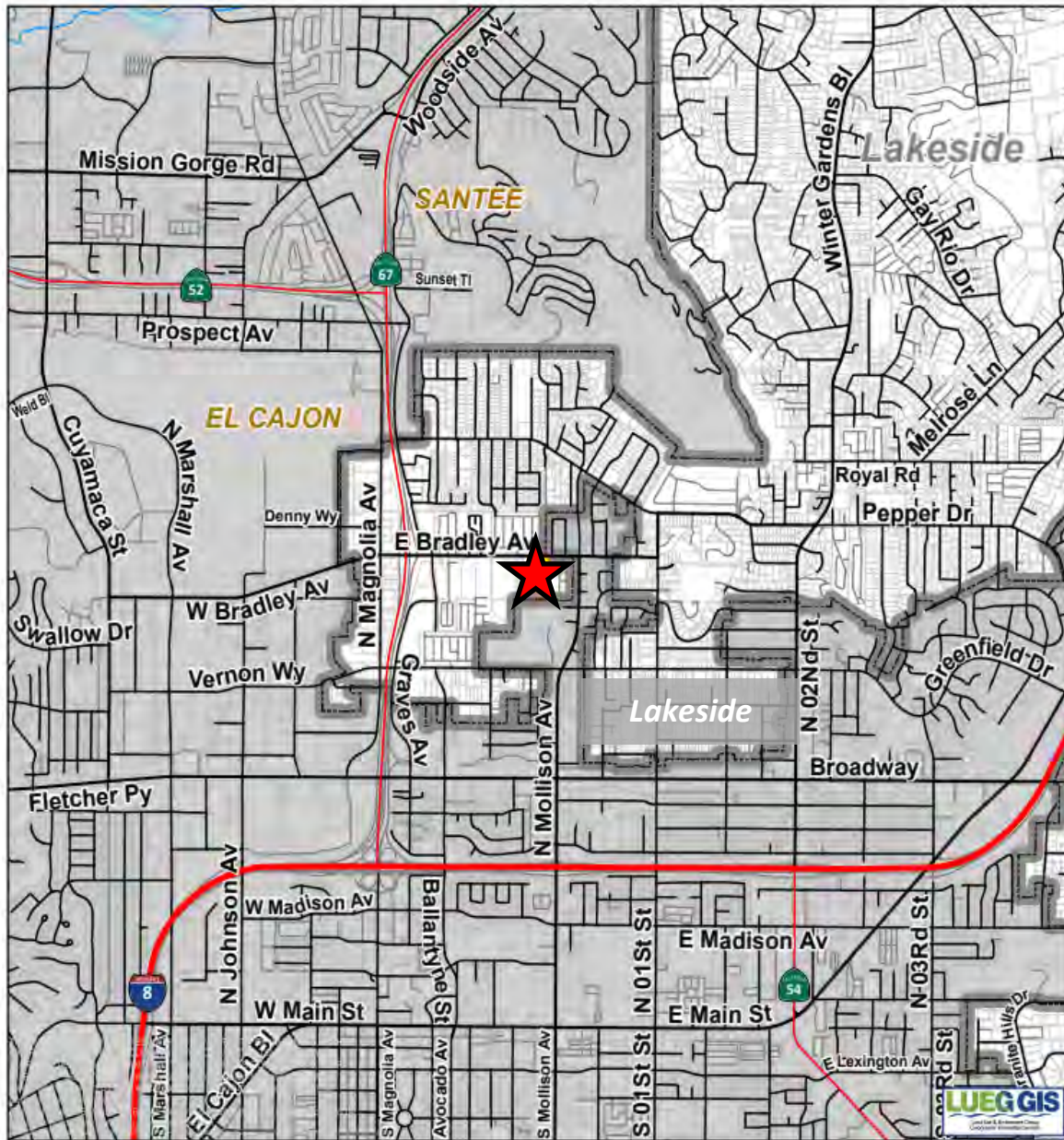


Figure 1: Vicinity Map



Figure 2: Aerial Photo

The General Plan Regional Category for the site is Village, and the General Plan Land Use Designation is Village Residential (VR-24). The Zoning Use Regulation for the site is Urban Residential (RU). The expansion of the existing convalescent care facility is authorized in the RU Use Regulation with the approval on a Major Use Permit.

Please refer to Attachment A – Planning Documentation, for maps of surrounding land uses and zoning designations.

Table D-1: Surrounding Zoning and Land Uses

Location	General Plan	Zoning	Adjacent Streets	Description
North	Village Residential (VR-15)	Mobile Home Residential Use (RMH)	E. Bradley Ave & Sams Hill Rd	Single/Multi-family Residential (MH)
East	Neighborhood Commercial (C-3) & Village Residential (VR-15)	Convenience Commercial (C-32) & Urban Residential (RU)	E. Bradley Ave & N. Mollison Ave	Commercial, Single Family Residential, Multi-family Residential

Location	General Plan	Zoning	Adjacent Streets	Description
South	Village Residential (VR-24) and City of El Cajon	Variable Residential (RV) & City of El Cajon	Greenfield Drive & Victor Ave	Industrial/Commercial, Multi-family Residential, Vacant
West	Village Residential (VR-24)	Urban Residential (RU)	E. Bradley Ave & Graves Lane	Multi-family Residential

E. DEVELOPMENT PROPOSAL

1. Project Description

The Project is a Major Use Permit Modification to expand an existing convalescent center on a 3.4-acre lot. The Project includes the construction of a new 25,515 square-foot Adult Residential Facility (ARF) with 66 independent units, and a new 10,613 square foot, 31-bed skilled nursing building, for a total of 97 new beds. Upon completion of the expansion, the project site would include four buildings with 153 beds, 87 skilled nursing beds and 66 transitional care beds.

In addition to the two new buildings, the site will also be improved with a new driveway location off Bradley Avenue, additional parking, new internal roads for circulation and access, new landscaping and enhanced lighting. The existing driveway would be relocated eastward to be more centered on the project site. The existing parking area would be improved and redesigned to accommodate the proposed expansion. Based on the number of beds, the required parking is 50 spaces. The proposed project includes 73 parking spaces, including standard parking spaces, accessible spaces, electric vehicle charging spaces, motorcycle parking spaces, and 3 bicycle spaces. An additional fire hydrant and a new fire lane access road is proposed along the eastern side of the property, allowing access to the rear of existing Building 2 and the proposed Building 3. The proposal also includes new landscaping and lighting throughout the facility.

The project would be served by Padre Dam Municipal Water District for sewer with imported water from Helix Water District. Fire service would be provided by the San Miguel Fire Protection District.

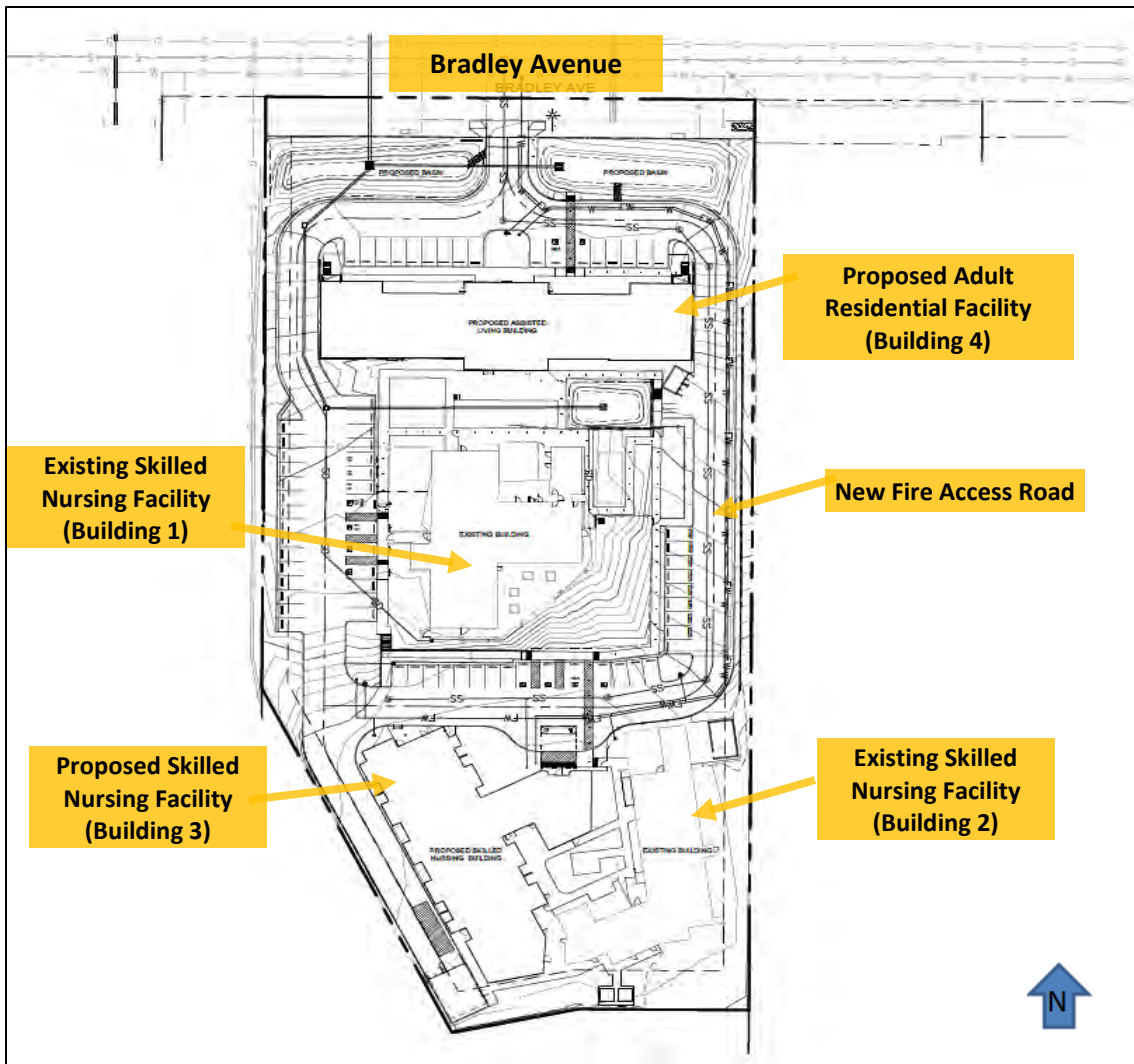


Figure 3: MUP Modification Site Plan



Figure 4: Building Rendering of the Site

Please refer to Attachment A – Planning Documentation, to view the Plot Plans, Elevations, Preliminary Grading Plans, and Conceptual Landscape Plans.

F. ANALYSIS AND DISCUSSION

The Project has been reviewed for conformance with all relevant ordinances and guidelines, including the San Diego County General Plan, the Lakeside Community Plan, the County Zoning Ordinance, and CEQA Guidelines. A discussion of the Project's consistency with applicable codes, policies, and ordinances, is described on the following pages.

1. Key Requirements for Requested Actions

- a. Is the proposed project consistent with the vision, goals, and policies of the General Plan?
- b. Does the project comply with the policies set forth under the Lakeside Community Plan?
- c. Is the proposed project consistent with the County's Zoning Ordinance?
- d. Is the project consistent with other applicable County regulations?
- e. Does the project comply with CEQA?

2. Analysis

Major Use Permit Findings

The discussion below pertains to scale, bulk and coverage, availability of services, effects upon neighborhood character, and suitability of the site for the type of proposed use. Staff has analyzed the Project in relation to each of these and has determined that the proposed location, size, design, and operating characteristics of the Project will be compatible with adjacent uses, residences, and commercial areas.

Lot coverage is the amount of building area that occupies an individual property and is expressed as a percentage (building area divided by the total lot area). Based on the zoning, there are no coverage requirements for this site. The proposed development would greatly increase the size of the existing facility. However, because 30-40% of the project site is currently undeveloped, the addition of the two buildings will not impact the Project's compatibility with the surrounding area. The coverage of the surrounding uses ranges from 14% to 57%. The total coverage on the project site after the expansion will total approximately 34% as the lot is sufficiently large enough to accommodate the expansion. Therefore, the project will be similar in coverage to lots to in the area.

The scale and bulk of the proposed expansion will also be compatible with the surrounding area. Most of the buildings near the site are multi-family residential buildings and there are also some commercial and industrial buildings. The two proposed buildings are consistent with the allowable height of 35-feet and maximum of two stories. Building 3 is 21 feet 6 inches high and is a one-story building. Building 4 is 23 feet high and consists of two stories and a basement. A Preliminary Landscaping Plan was submitted for the project with landscaping proposed on all visible sides of the proposed development. Landscaping is proposed to help break up the view of the buildings' appearance. Trees and shrubs will be added along the perimeter of the project site. The facility has been designed to flow within the natural surroundings and step up the hill from Bradley Ave. Surrounding apartments and other facilities use a similar approach along Bradley Ave. In addition, the development directly south of the project site, located within the City of El Cajon, is developed

with an industrial/manufacturing use and contains multiple structures with similar scale and bulk as the proposed expansion. Apartment buildings to the west of the project site share a comparable bulk and scale with the proposed project. Therefore, as demonstrated above, the proposed project would be consistent with the scale and bulk of existing uses in the surrounding area.

The project site, as well as surrounding areas, are designated in the County's General Plan as Village Residential (VR-15 and VR-24) and Neighborhood Commercial. Properties within the Village Residential zones are allowed a density of up to 15 dwelling units per acre in the VR-15 zone, and 24 dwelling units per acres in the VR-24 zone. The proposed project also aligns with the General Plan's vision for village areas by serving as a community-serving facility. The proposed facility is designed to support residents with varying degrees of physical ailments and mental health needs within the community. Therefore, the project is beneficial to the community and is located in an area with high connectivity and accessibility from surrounding residential neighborhoods. The project is located along East Bradley Ave, which is a 4.1B Major Road in the San Diego County General Plan Mobility Element. It is fully paved with sidewalks and consists of multiple bus stops. Therefore, the proposed location, size, design, and operating characteristics of the Project will be compatible with adjacent uses, residences, and commercial areas.



Figure 5: Looking Southeast at Building 4 across Bradley Avenue



Figure 6: Proposed Building 3

Biological Resources

The project site is located in the Multiple Species Conservation Program (MSCP). Approximately 2.11 acres of disturbed habitat is present on site and classified as Tier IV habitat. This is the lowest tier and is not considered sensitive by state or federal agencies. Based on the determinations of the Biological Resources Letter Report, there is no designated critical habitat for special-status wildlife species on the project site. Sensitive biological resources on site include trees and other structures suitable for nesting birds. Given the potential for urban-adapted birds to nest within the ornamental trees and shrubs on-site, the Project has been conditioned to avoid construction impacts to nesting birds. Specifically, if initial clearing activities take place between February 15 and August 15, nesting bird surveys are recommended to be performed by a qualified biologist/ornithologist with results reported subsequently to the County prior to grading and clearing. If nesting birds are found, a County-approved construction buffer may be required until all young are determined no longer dependent on the nest. With the implementation of this measure, project impacts to biological resources would be less than significant.

Traffic and Mobility

A Transportation Analysis was prepared for the Project by Linscott Law and Greenspan (LLG) which included a Vehicle Miles Traveled (VMT) analysis and a Local Mobility Analysis (LMA). The VMT analysis identified the site as an Infill Area and was presumed to have a less than significant VMT impact and no VMT mitigation measures are required. The LMA analyzed safety and operations of nearby roads. The proposed Project was calculated to generate 263 new daily trips with 19 AM peak hour trips (12 inbound / 7 outbound) and 26 PM peak hour trips (10 inbound / 16 outbound). The Project traffic was distributed and assigned to the street system based on the distribution of the Project shown in the existing driveway counts, as well as a review of the site location, proximity to State Route 67 (SR 67), existing traffic patterns in the area, a review of trip distribution of similar land uses from recently approved development projects in the vicinity and anticipated traffic patterns to and from the site. East Bradley Avenue currently operates at Level of Service (LOS) B and C at the

intersection of Sams Hill Road and at the project driveway. With the addition of the Project, these intersections will remain at LOS B and C. Therefore, the traffic study concluded that the additional trips would not result in any significant impacts.

Noise Impacts

Noise generated by the Project will not exceed the standards of the County of San Diego Noise Ordinance or Noise Element of the General Plan at or beyond the Project's property line. According to the Noise Report completed by Rincon Consultants, operational noise sources would not exceed the allowable noise threshold. Property line noise levels would be less than the Noise Ordinance limit applicable to each zone. Therefore, the project is expected to be in compliance with the Noise Ordinance without mitigation.

Noise at the project site is primarily from traffic on East Bradley Avenue. The project's outdoor living areas would experience noise levels as high as 49 Community Noise Equivalent Level (CNEL), which would be below the 60 CNEL exterior noise standard applicable to the project. Interior noise levels would range from 10 CNEL to 45 CNEL. These levels are below the County of San Diego's 45 CNEL standard for interior noise levels and impacts would be less than significant.

Noise from the temporary construction activities may exceed the allowable threshold if operating at 50 feet from the nearest residential property line. Therefore, the Project includes a condition to install construction noise reduction measures such as temporary sound barriers and a 24-hour contact number during construction activities.

Greenhouse Gas/Air Quality

A Greenhouse Gas (GHG) analysis was prepared and analyzed potential impacts associated with the project. When the environmental review was conducted for this project, the County did not have locally adopted screening criteria or GHG thresholds. Pending the adoption of the new CAP (which has since been adopted), the project was analyzed based upon the project's consistency with plans and policies adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change, including the CARB 2022 Scoping Plan and SANDAG's 2021 Regional Plan. The proposed project would be consistent with these goals through project design that would be consistent with latest California 2022 Energy Code. The proposed building structures would incorporate photovoltaic solar power (PV) provisions consistent with the requirements for residential land uses. In addition, the 2022 CALGreen Standards state that five percent of the total number of parking spaces shall be equipped with Level 2 electric vehicle supply equipment, which is between three and four electric chargers. The Project exceeds the requirement with five proposed EV parking spaces. The project is approximately 120 feet from the nearest transit bus stop, and 0.25 mile from four other bus stops. Therefore, the project was found to have a less than significant impact on Greenhouse Gas Emissions.

General Plan Consistency

The site is subject to the Village General Plan Regional Category and Village Residential (VR-24) Land Use Designations. The Project is consistent with the following relevant General Plan goals, policies, and actions as described in Table F-1.

Table F-1: General Plan Conformance

General Plan Policy	Explanation of Project Conformance
<p>Goal S-2 – Emergency Response. Effective emergency response to disasters that minimizes the loss of life and damage to property, while also reducing disruption in the delivery of vital public and private services during and following a disaster.</p>	<p>The San Miguel Consolidated Fire Protection District has reviewed and approved the proposed project. The Fire Station is immediately southeast of the facility.</p>
<p>Policy LU-2.8 Mitigation of Development Impacts. Require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, vibrations, dust, odor, aesthetic impairment and/or are detrimental to human health and safety.</p>	<p>Various technical studies were submitted for the project and demonstrated that the implementation of the of the proposed project would not result in excessive noise, vibration, dust, odor, and aesthetic impairment. In addition, the project would incorporate appropriate conditions to ensure that any potential impacts from the project would be mitigated to less than significant.</p>
<p>Policy LU-6.5 – Sustainable Stormwater Management. Ensure that development minimizes the use of impervious surfaces and incorporates other Low Impact Development (LID) techniques as well as a combination of site design, source control, and stormwater best management practices (BMP), where applicable and consistent with the County's LID Handbook.</p>	<p>The Project has incorporated required stormwater management features in accordance with the County's Low Impact Development (LID) Handbook. Biofiltration basins are planned to be incorporated throughout the site to treat and detain runoff from impervious and landscaped areas.</p>
<p>Policy LU-9.5 Village Uses: Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.</p>	<p>The proposed project is a request to expand the existing skilled nursing facility that focuses primarily on post-hospitalization transitional care. The facility would be beneficial to the community as the facility is designed to support residents with varying degrees of physical ailments and mental health needs within the community. This would provide them with a mix of options and living arrangements. In addition, the proposed project will provide employment, is located near the core of the Village, and has high visibility.</p>
<p>Policy LU-11.1 Location and Connectivity: Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.</p>	<p>The proposed is located on East Bradley Avenue, identified as a major roadway in the General Plan Mobility Element. It a fully paved road with sidewalks that allows walkability and accessibilities for residents in the surrounding area. In addition, there are multiple bus stops along East Bradley Ave, which provides high connectivity and accessibility to the residential neighborhoods, ensuring ease of access and convenience.</p>

General Plan Policy	Explanation of Project Conformance
<p>Policy LU-11.2 Compatibility with Community Character: Require that commercial, office, and industrial development be located, scaled, and designed to be compatible with the unique character of the community.</p>	<p>The Project has been found to be compatible with the community character of Lakeside. The Community Plan states that residential areas should be buffered from incompatible activities that create heavy traffic, noise, lighting, odors, dust, and unsightly views. The Design Guidelines also state that when land use or development patterns require a project to be different from its neighbors, a transition from existing to new development should be provided by careful placement and massing of buildings, well-designed planting patterns and other means. As part of the review process, various technical studies were prepared for the project to demonstrate that the implementation of the project would not result in any adverse impacts to the area. The project is also appropriately conditioned to ensure any impacts are mitigated. Additionally, the proposed buildings have been designed to be one and two story buildings in earth tones (light matte greens, beige, grays, tans) with low-pitched roofs to reflect the character of existing uses found in the project vicinity.</p>
<p>COS-4.2 Drought-Efficient Landscaping: Require efficient irrigation systems and in new development encourage the use of native plant species and non-invasive drought tolerant/low water use plants in landscaping.</p>	<p>The project would be required to include preparation of Landscape Plans pursuant to the County's Water Efficient Landscape Design Manual and Water Conservation in Landscaping Ordinance. The landscaping is designed with climate adapted plants that require little-to-no water.</p>

2. **Community Plan Consistency**

The Proposed Project is consistent with the following relevant Lakeside Community Plan goals, policies, and actions as described in Table F-2.

Table F-2: Community Plan Conformance

Lakeside Community Plan Policy	Explanation of Project Conformance
<p><u>COMMUNITY CHARACTER</u> Policy 3. Create more effective means to provide citizens with increased input to all the planning and policy-making decisions that affect their lives and the future of Lakeside.</p>	<p>During the initial project submittal, notices containing pertinent information were sent to neighbors within 300 feet of the project site. The notice aimed to inform the community about the proposed project and encourage public participation. As part of the review process, the proposal was also submitted to the Lakeside Community Planning Group for consideration. Additionally, a further notice was distributed to properties within 1,500 feet of the project site for the CEQA public review period and also prior to today's hearing. As a result, the community was provided several opportunities to engage and participate during the planning and processing of this proposed project.</p>
<p><u>LAND USE (COMMERCIAL GOAL)</u> Policy 15. Require commercial and industrial land uses to minimize adverse impacts, such as noise, light, traffic congestion, odors, dust, etc.</p>	<p>As part of the project review, various technical studies were prepared to assess if the implementation of the proposed project would result in adverse impacts. These studies either provided evidence that the project would not create adverse effects or included mitigation measures that will be implemented with the project.</p>
<p><u>PUBLIC FACILITIES AND SERVICES</u> Policy 12. Projects shall not be approved if it is necessary to extend sewer lines into areas that can adequately handle sanitation problems through individual septic systems.</p>	<p>The project would be served by Padre Dam Municipal Water District for sewer. No new or expanded water or wastewater facilities are required for the project.</p>

3. Zoning Ordinance Consistency

The Project complies with all applicable zoning requirements of the Single Family Residential (RS) Zoning Use Regulation with the incorporation of conditions of approval (Table F-3).

Table F-3: Zoning Ordinance Development Regulations

CURRENT ZONING REGULATIONS		CONSISTENT?
Use Regulation:	RU	Yes, upon approval of a MUP
Animal Regulation:	Q	N/A
Density:	-	N/A
Lot Size:	6000	Yes
Building Type:	L	Yes
Height:	G	Yes
Lot Coverage:	-	N/A
Setback:	K	Yes
Open Space:	A	Yes

6 - 14

Special Area Regulations:	C	Yes

Table F-4: Zoning Ordinance Development Regulations Compliance Analysis

Development Standard	Proposed/Provided	Complies?
Sections 1350, 2140 through 2146 defines the uses permitted within the Single-Family Residential Use (RU) Zoning Use Regulation.	The proposed expansion to the existing facility is permitted within the Urban Residential zone upon approval of a Major Use Permit Modification.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Upon approval of a MUP.
Section 4600 of the Zoning Ordinance requires the Project to comply with the "G" building height requirements.	The "G" height designator specifies a building height to not exceed 2 stories and 35 feet. The proposed height of the proposed buildings range between 21 feet 6 inches to 23-feet high, which is consistent with the 35-foot height requirement. In addition, the Project does not exceed the 2-story limit.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

6 - 15

Development Standard	Proposed/Provided	Complies?
<p>The project has a Setback Designation of "H." This is subject to Zoning Ordinance Section 4800. FY:50', IS: 5', ES: 35' and RY: 25'.</p>	<p>The "K" setback designator specifies main building setbacks to not exceed the following: 50-foot front yard, 5-foot interior side yard, 25-foot rear yard setback. All structures meet the main building setback requirements. The building closest to East Bradley Avenue is set back approximately 92 feet from the centerline. Building 3 is proposed in the southern portion of the project site and conforms to the interior and rear yard setbacks.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Section 5250-5260 of the Zoning Ordinance contains regulations for properties within an Airport Influence Area (AIA) for which an Airport Land Use Compatibility Plan (ALUCP) is adopted.</p>	<p>The project has been reviewed and found to comply with all applicable airport land-use compatibility plans. The project has been conditioned to include a notification to the Federal Aviation Administration (FAA) and to require an overflight agreement.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Section 6764 of the Zoning Ordinance indicates that medical care facilities such as psychiatric institutions require 0.33 parking spaces per bed and 0.05 bike space per car space but not less than 3. 153 total beds x 0.33 = 50.49 (50).</p>	<p>Based on the total beds, the required parking is 50 spaces. The proposed project includes 73 parking spaces, including standard parking spaces, accessible spaces, electric vehicle charging spaces, and motorcycle parking spaces. The project is also including 3 bicycle spaces.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>

Development Standard	Proposed/Provided	Complies?
<p>Section 7350 known as the Use Permit procedure allows use permit to be granted. A use permit may be granted to provide for the accommodation of land uses with special site or design requirements, operating characteristics, or potential adverse effects on surroundings, through review and, where necessary, the imposition of special conditions of approval.</p>	<p>The proposed project is seeking an approval for the MUP modification process to allow an expansion for the existing skilled nursing and assisted living care facility. The proposed project is consistent with the Zoning, General Plan, community characters as specified in the Lakeside Community Plan and Design Guidelines. In addition, all findings per the MUP can be made for the proposed project.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>

4. **California Environmental Quality Act (CEQA) Compliance**

The project has been reviewed for compliance with the CEQA and a Mitigated Negative Declaration (MND) was prepared and was available for 33-day public review period from December 12, 2024, through January 13, 2025. The CEQA documents are on file with PDS under Environmental Log Number PDS2021-ER-21-14-004. The MND found that the Project, with incorporation of mitigation measures, will not cause any significant effects on the environment. Mitigation measures for biological resources, archaeological monitoring, and paleontological monitoring have been included in the conditions of approval for the proposed project. The Initial Study and MND can be found in Attachment C – Environmental Documentation.

Applicable County Regulations

Table F-5: Applicable Regulations

County Regulation Policy	Explanation of Project Conformance
<p>a. Resource Protection Ordinance (RPO)</p>	<p>The Project has been reviewed and found to be in conformance with the RPO. There are no RPO steep slopes on the property, no biological resources, and no floodway/flood plains. Cultural resources considered sensitive by the RPO will be mitigated for in full compliance with the RPO.</p>
<p>b. County Consolidated Fire Code</p>	<p>The Project has been reviewed by the San Miguel Consolidated Fire Protection District and has been accepted in compliance with the County Consolidated Fire Code. The proposed plans are required to comply with the County's emergency access requirements per the San Diego County Fire Code and Consolidated Fire Code, including turning radius and maneuverability of large emergency vehicles such as fire trucks and ambulances. Additionally, San Miguel Fire Protection District Station 19 is located immediately east of the project site.</p>

c. Noise Ordinance	The Project as conditioned will not generate significant noise levels which exceed the allowable limits of the County Noise Element or Noise Ordinance.
d. Light Pollution Code	The Project will implement outdoor lighting and glare controls which will ensure compliance with the Light Pollution Code.
e. Watershed Protection Ordinance (WPO)	A Stormwater Quality Management Plan (SWQMP) was prepared for the Proposed Project in compliance with the WPO. The Project will require installation of BMPs such as a bio retention area for treatment of stormwater.
f. Multiple Species Conservation Program (MSCP)	The project site is located within the Metro-Lakeside-Jamul segment of the County's Multiple Species Conservation Program (MSCP) Subarea Plan. Approximately 2.11 acres of disturbed habitat is present on site and classified as Tier IV habitat. This is the lowest tier and is not considered sensitive by state or federal agencies.

G. COMMUNITY PLANNING GROUP (CPG)

On August 3, 2022, the Applicant presented the Project to the Lakeside Community Planning Group (CPG). The Lakeside CPG voted to approve the project by a vote of 11-0-0-4 (11 yes, 0 no, 0 abstain and 4 vacant/absent) and requested the applicant return for a design review. On September 11, 2024, the Lakeside Design Review Board recommended approval of the Major Use Permit Modification, as requested by the CPG. Documentation can be found in Attachment E – Public Documentation.

H. PUBLIC INPUT

At the time of application submittal on July 19, 2021, and in accordance with Board Policy I-49, public notices were sent to property owners within a minimum radius of 300 feet of the project site until at least 20 different property owners were noticed. Notice of the Project was also posted at the site.

During the public review period of the Mitigated Negative Declaration, from December 12, 2024 to January 13, 2025, 1,030 individuals within a 1500 radius of the Project site were noticed about the Project. No comments were received.

Notice of today's hearing was sent to approximately 1,033 property owners, which includes all property owners within 1,500 square feet radius of the project site.

I. STAFF RECOMMENDATIONS

Staff recommends that the Planning Commission take the following actions:

- a. Adopt the Environmental Findings which includes a finding that the project is subject to the Mitigated Negative Declaration (Attachment D and E).
- b. Grant MUP Modification Decision PDS2021-MUP-85-053W2, which includes the requirements and conditions set forth in the Form on Decision (Attachment B).

Report Prepared By:

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AUTHORIZED REPRESENTATIVE: _____



VINCE NICOLETTI, DIRECTOR

ATTACHMENTS:

Attachment A – Planning Documentation

Attachment B – Form of Decision Approving PDS2021-MUP-85-053W2

Attachment C – Environmental Documentation

Attachment D – Environmental Findings

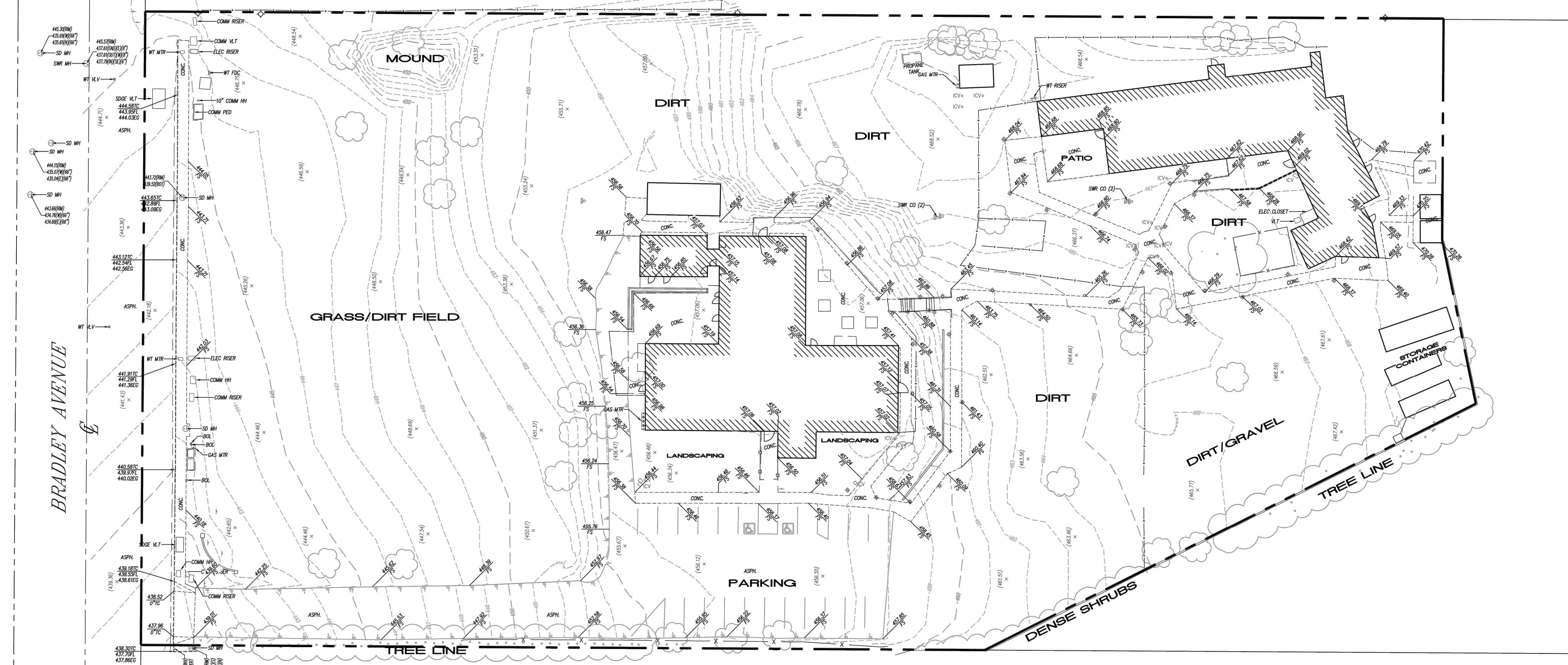
Attachment E – Public Documentation

Attachment F – Ownership Disclosure

Attachment A – Planning Documentation

TOPOGRAPHIC SURVEY

CITY OF EL CAJON, COUNTY OF SAN DIEGO, STATE OF CALIFORNIA



BASIS OF BEARINGS

THE BEARINGS SHOWN HEREON ARE BASED ON STATIC GPS TIES TO TWO CONTINUOUS GPS STATIONS (CGPS) REFERRED TO AS "P472" AND "P475", BEING NORTH 28°20'18" EAST BASED ON POSITIONS PUBLISHED IN THE CALIFORNIA SPATIAL REFERENCE CENTER.

DATUM STATEMENT
THE COORDINATES SHOWN HEREON ARE BASED ON THE CALIFORNIA COORDINATE SYSTEM OF 1983 (CCS83) ZONE VI, RELATIVE TO THE NORTH AMERICAN DATUM OF 1983 (2017.50 EPOCH GPS ADJUSTMENT)

BENCHMARK

CITY OF EL CAJON BENCHMARK NUMBER "88"
ELEVATION: 458.13 FEET [DATUM: NAVD 88]
DESCRIPTION: STD BM T/C SOUTH END CURB RETURN AT SW CORNER MOLLISON & BRADLEY AVENUE.

SITE ADDRESS

THE BRADLEY COURT - REHABILITATION CENTER
675 E BRADLEY AVENUE, EL CAJON, CA 92021

DATE OF SURVEY

THE PROPERTY DESCRIBED ON THIS PLAT WAS SURVEYED JULY 05, 2023.

SURVEYOR'S STATEMENT

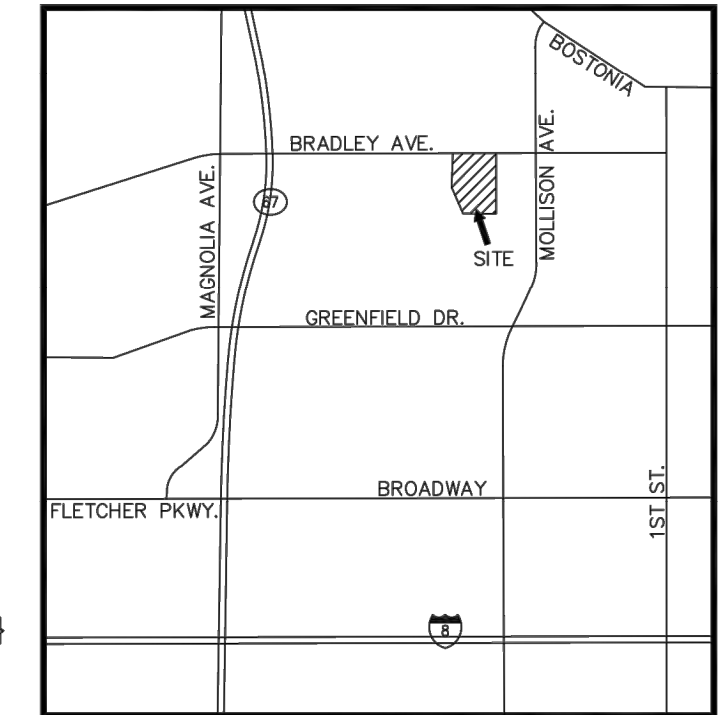
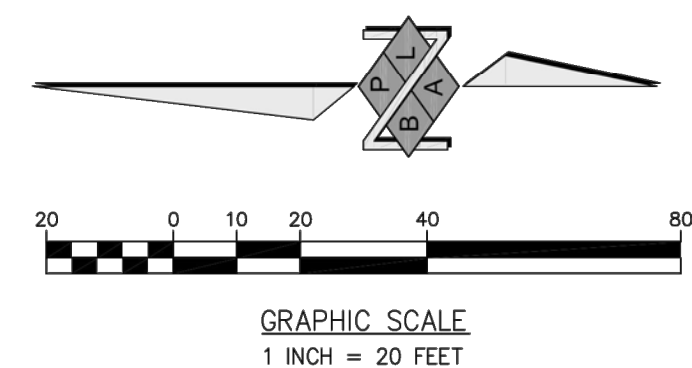
I HEREBY STATE THAT I AM A LICENSED LAND SURVEYOR OF THE STATE OF CALIFORNIA, THAT THIS MAP CONSISTING OF 1 SHEET REPRESENTS A TRUE AND COMPLETE SURVEY MADE BY ME OR UNDER MY DIRECTION IN JULY 05, 2023.

LEGEND

<p>--- RIGHT-OF-WAY LINE</p> <p>--- LOT/PARCEL LINE</p> <p>--- STREET CENTERLINE</p> <p>--- BOUNDARY LINE</p> <p>--- CONCRETE</p> <p>--- BUILDING OVERHANG LINE</p> <p>--- LINE STRIPING</p> <p>--- EDGE OF ASPH PAVEMENT</p> <p>--- WALL</p> <p>--- CHAIN LINK FENCE</p> <p>--- IRON FENCE</p> <p>--- GRADE BREAK LINE</p> <p>--- CONCRETE SIDEWALK</p> <p>--- 1 FOOT CONTOUR INTERVAL</p> <p>--- 5 FOOT CONTOUR INTERVAL</p> <p>--- EXISTING BUILDING</p>	<p>ABOVE GROUND FEATURES</p> <p>CONE - CONCRETE</p> <p>ASPH - ASPHALT</p> <p>AD - AREA DRAIN</p> <p>BP - BACKFLOW PREVENTOR</p> <p>CB - CATCH BASIN</p> <p>CLS - CLEANOUT</p> <p>DRWY - DRIVEWAY</p> <p>EDC - EDGE OF PAVEMENT</p> <p>EP - FIRE DEPT. CONNECTION</p> <p>GUY - GUY WIRE</p> <p>HH - HANDHOLE</p> <p>ICV - IRRIGATION CONTROL VALVE</p> <p>MH - MANHOLE</p> <p>MTR - METERS</p> <p>PEP - PEDESTAL</p> <p>PP - POWER POLE</p> <p>SL - STREET LIGHT</p> <p>TRANS - TRANSFORMER</p> <p>V.T. - VAULT</p> <p>V.V. - VALVE</p> <p>UTILITIES</p> <p>COM - COMMUNICATION</p> <p>SD - STORM DRAIN</p> <p>SWR - SANITARY SEWER</p> <p>WT - WATER</p>	<p>○ VALVE</p> <p>○ ICV HH</p> <p>○ UTILITY MH</p> <p>○ SIGN</p> <p>○ POST</p> <p>○ POWER POLE</p> <p>○ BOLLARD</p> <p>○ TREE</p> <p>○ PALM</p> <p>○ GROUND LIGHT</p> <p>○ SEWER CLEANOUT</p> <p>○ WATER FDC</p> <p>○ ABOVE GROUND GAS METER</p> <p>○ HANDICAP STALL DECAL</p> <p>○ DOOR/GATED ACCESS</p>
---	--	---

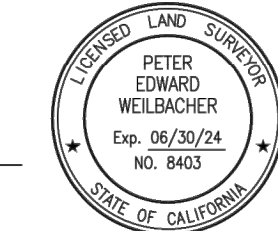
SURVEYOR'S NOTES

- THE PURPOSE OF THIS SURVEY IS TO LOCATE AND PREPARE A TOPOGRAPHIC SURVEY OF THE AREA SHOWN AS SPECIFIED BY THE CLIENT.
- THIS SURVEY DOES NOT CONSTITUTE A TITLE SEARCH BY PBLA SURVEYING, INC. OR THE SURVEYOR TO DETERMINE OWNERSHIP OF THIS PARCEL OR TO VERIFY THE DESCRIPTIONS PROVIDED. PARCEL LINES ARE SHOWN AS REFERENCE PER RECORD INFORMATION AND DOES NOT CONSTITUTE OR PURPORT TO BE A BOUNDARY SURVEY.
- BOUNDARY AREA SHOWN HEREON IS BASED ON A RECORD OF SURVEY NO. 1437, FILED FEBRUARY 24, 1947 IN FILE NO. 19128, AND PER A DEED RECORDED MARCH 03, 2020 AS DOCUMENT NO. 2020-0108713, BOTH IN THE OFFICE OF THE COUNTY RECORDER OF SAN DIEGO COUNTY, STATE OF CALIFORNIA.



VICINITY MAP
NOT TO SCALE

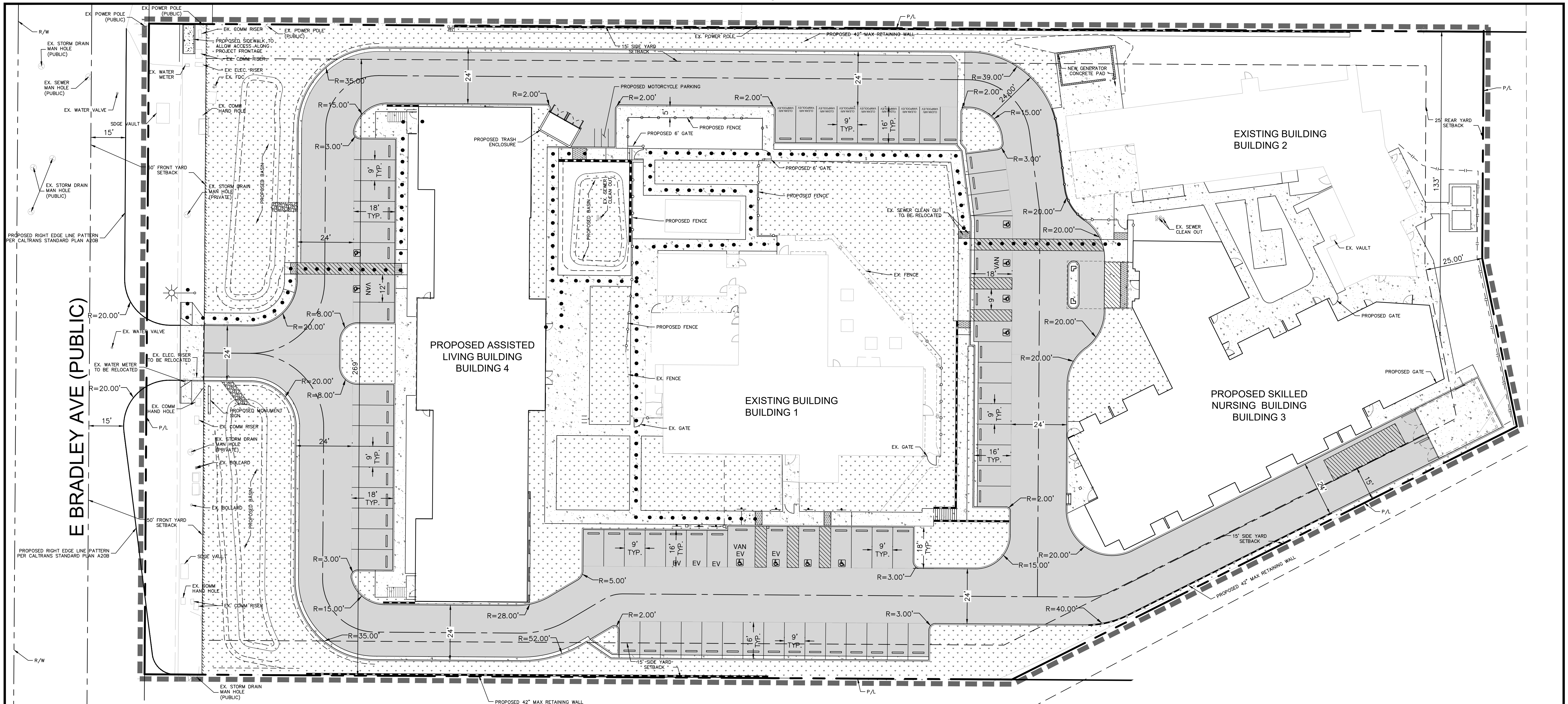
PETER E. WELBACHER, PLS 8403
EXPIRES: 08-30-24



<p>PREPARED FOR:</p> <p>Kimley-Horn</p> <p>© 2023 BRILEY-HORN AND ASSOCIATES, INC. 1100 W TOWN AND COUNTRY ROAD, SUITE 100, ORANGE, CA 92668 PHONE: 714-639-1000 WWW.KIMLEY-HORN.COM</p>	<p>PREPARED BY:</p> <p>PBLA SURVEYING, INC. Planning • Engineering • Surveying 981 CORPORATE CENTER DR., STE. 168 POMONA, CALIF. 91768 (888) 714-9642 • (714) 889-9191 FAX</p>	DATE	BY	REVISION	APP'D	JOB NO.
		07/07/2023	DH	FIRST RELEASE	PW	5001-787
		07/10/2023	DH	SECOND RELEASE - SD PIPE SIZE EDIT	PW	
						Sht. 1 of 1

COUNTY APPROVED CHANGES			PRIVATE CONTRACT		
DESCRIPTION:	APPROVED BY:	DATE:	SHEET	COUNTY OF SAN DIEGO DEPARTMENT OF PUBLIC WORKS	9 SHEETS
GRADING PLAN FOR:					
EXISTING CONDITIONS					
CALIFORNIA COORDINATE INDEX _____					
APPROVED DIRECTOR OF PUBLIC WORKS BY:	ENGINEER OF WORK		R.C.E.		
			GRADING PERMIT NO.:		

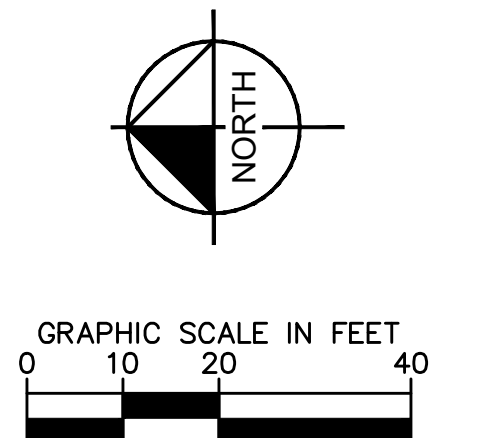
DESIGNED BY:	SL	DATE		PREPARED BY:	KYLE KOIVUNEMI, PE	58449
DRAWN BY:	SL	DATE		REGISTERED ENGINEER		RCE NUMBER
CHECKED BY:	KK	DATE		ENGINEER'S SEAL		
REV. / SYMBOL	DESCRIPTION OF CHANGE	R.C.E.	DATE	P.D.E.	DATE	



SAMS HILL ROAD (PRIVATE)

LEGEND

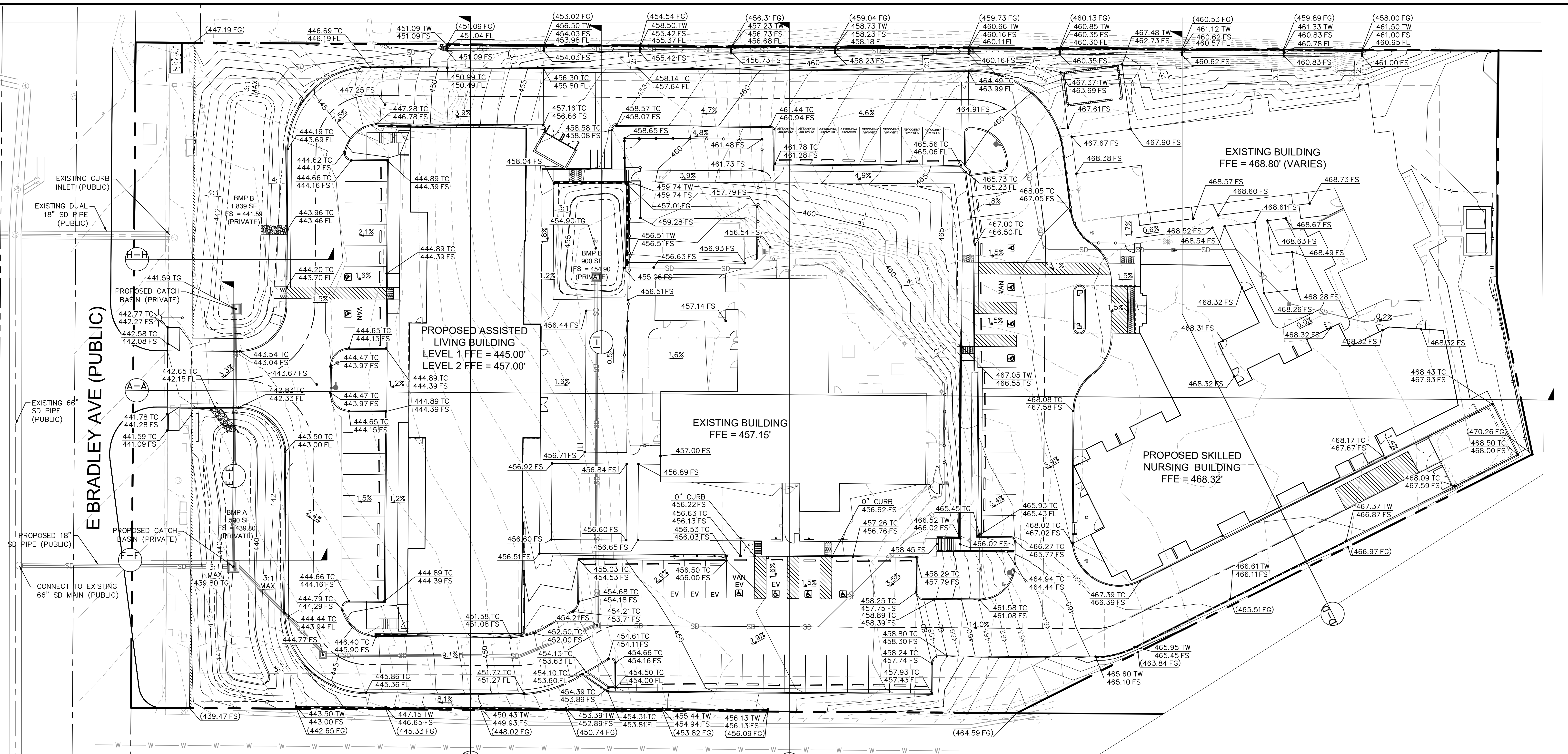
	PROPERTY LINE
	CENTERLINE
	SETBACK LINE
	CIVIL LIMIT OF WORK LINE
	RETAINING WALL
	ACCESSIBLE PATH OF TRAVEL (DO NOT PAINT, FOR REFERENCE ONLY)



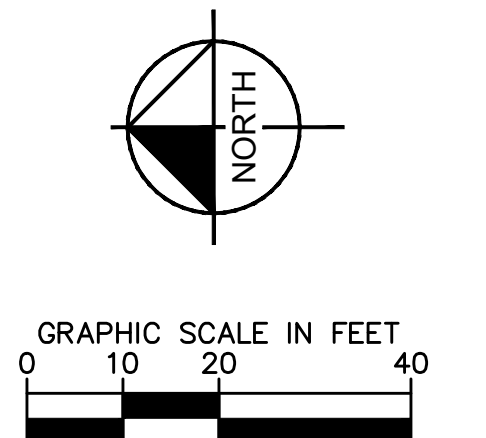
COUNTY APPROVED CHANGES			PRIVATE CONTRACT		
DESCRIPTION:	APPROVED BY:	DATE:	SHEET	COUNTY OF SAN DIEGO DEPARTMENT OF PUBLIC WORKS	9 SHEETS
GRADING PLAN FOR:					
HORIZONTAL CONTROL AND PAVING PLAN					
CALIFORNIA COORDINATE INDEX					
APPROVED DIRECTOR OF PUBLIC WORKS BY:			ENGINEER OF WORK		
			R.C.E.		
GRADING PERMIT NO.:					

811
 Know what's below.
 Call before you dig.
 DIAL TOLL FREE
811
 AT LEAST TWO DAYS
 BEFORE YOU DIG
 UNDERGROUND SERVICE ALERT OF SOUTHERN CALIFORNIA

DESIGNED BY:	SL	DATE		PREPARED BY:	KYLE KOIVUNIEMI, PE	58449
DRAWN BY:	SL	DATE		REGISTERED ENGINEER		RCE NUMBER
CHECKED BY:	KK	DATE		ENGINEER'S SEAL		
REV. SYMBOL	DESCRIPTION OF CHANGE	R.C.E.	DATE	P.D.E.	DATE	



- LEGEND**
- GRADING LIMITS OF WORK
 - - - PROPERTY LINE
 - - - CENTERLINE
 - - - CIVIL LIMIT OF WORK LINE
 - - - EXISTING MAJOR CONTOUR
 - - - EXISTING MINOR CONTOUR
 - - - 749 PROPOSED MINOR CONTOUR
 - - - 750 PROPOSED MAJOR CONTOUR
 - - - PROPOSED RETAINING WALL BY OTHERS
 - xxx.xx TC PROPOSED SPOT ELEVATION
 - xxx.xx FS
 - TC = TOP OF CURB
 - FS = FINISHED SURFACE
 - TW = TOP OF WALL
 - BW = BOTTOM OF WALL
 - FFE = FINISHED FLOOR ELEV.



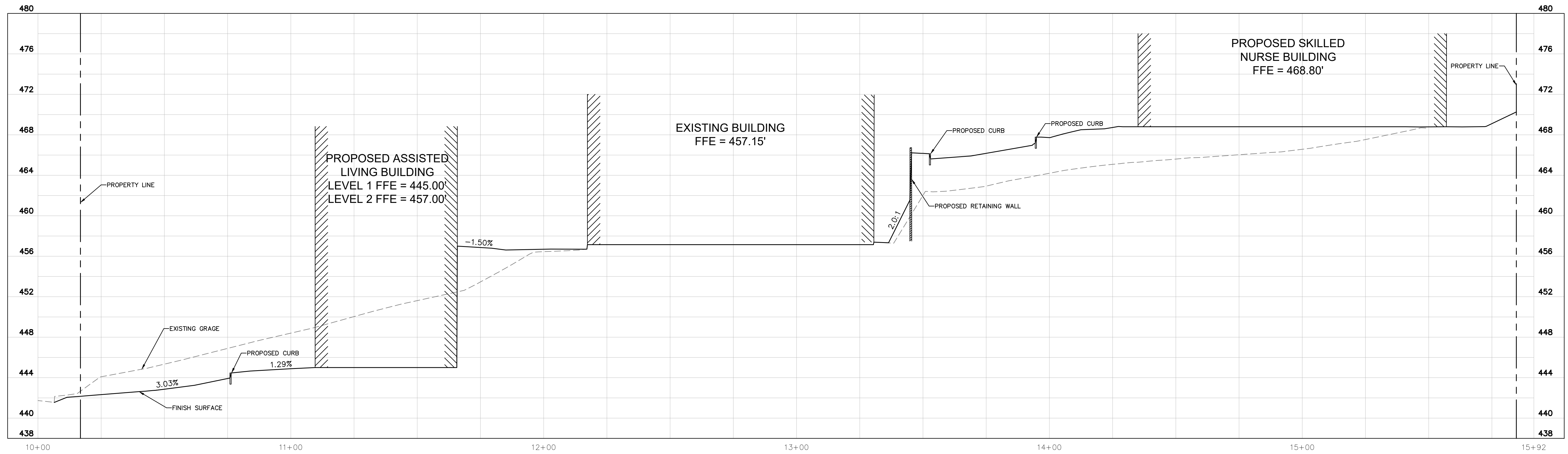
811
 Know what's below.
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 8 1 1
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REV.	SYMBOL	DESCRIPTION OF CHANGE	R.C.E.	DATE	P.D.E.	DATE

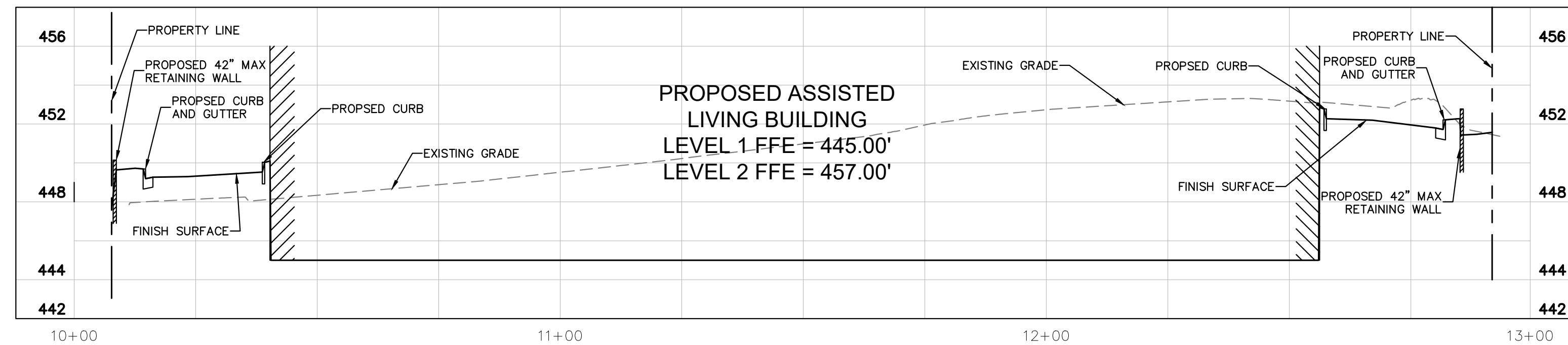
DESIGNED BY: SL DATE	PREPARED BY: KYLE KOIVUNEMI, PE REGISTERED ENGINEER
DRAWN BY: SL DATE	58449 RCE NUMBER
CHECKED BY: KK DATE	ENGINEER'S SEAL

COUNTY APPROVED CHANGES		
DESCRIPTION:	APPROVED BY:	DATE:

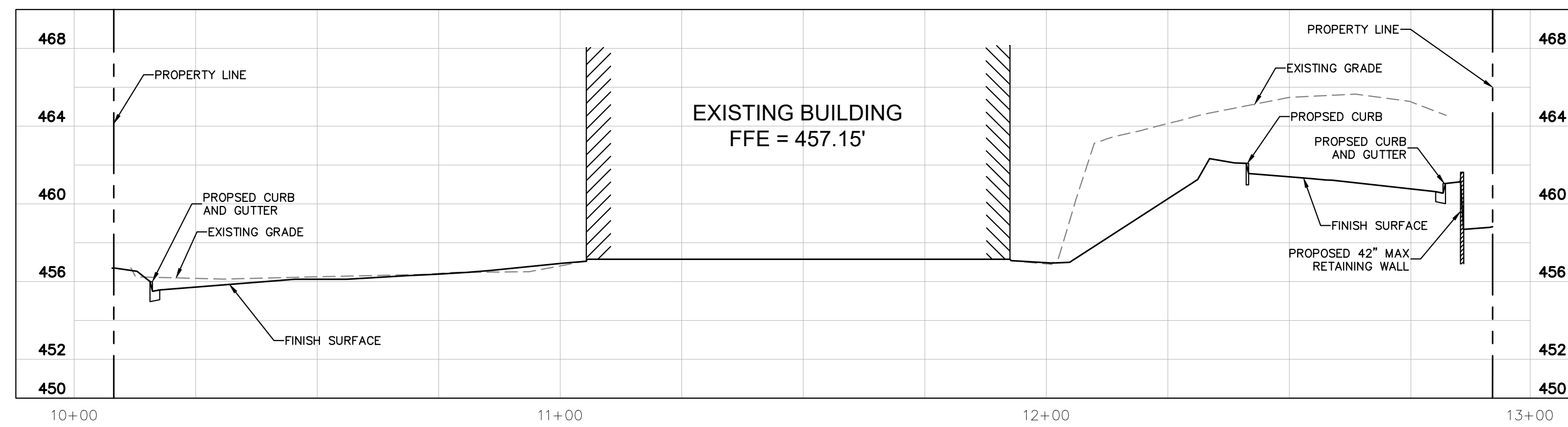
PRIVATE CONTRACT		
SHEET 4	COUNTY OF SAN DIEGO DEPARTMENT OF PUBLIC WORKS	9 SHEETS
GRADING PLAN FOR: GRADING AND DRAINAGE		
CALIFORNIA COORDINATE INDEX		
APPROVED DIRECTOR OF PUBLIC WORKS BY:	ENGINEER OF WORK R.C.E.	GRADING PERMIT NO.:



SECTION A-A:
SCALE: V: 1" = 5'
H: 1" = 20'



SECTION B-B:
SCALE: V: 1" = 5'
H: 1" = 20'



SECTION C-C:
SCALE: V: 1" = 5'
H: 1" = 20'

COUNTY APPROVED CHANGES			PRIVATE CONTRACT		
DESCRIPTION:	APPROVED BY:	DATE:	SHEET	COUNTY OF SAN DIEGO DEPARTMENT OF PUBLIC WORKS	9 SHEETS
			GRADING PLAN FOR:		
			SECTIONS		
			CALIFORNIA COORDINATE INDEX _____		
			APPROVED DIRECTOR OF PUBLIC WORKS BY:	ENGINEER OF WORK	R.C.E.
			GRADING PERMIT NO.:		



811
DIAL TOLL FREE
8 1 1
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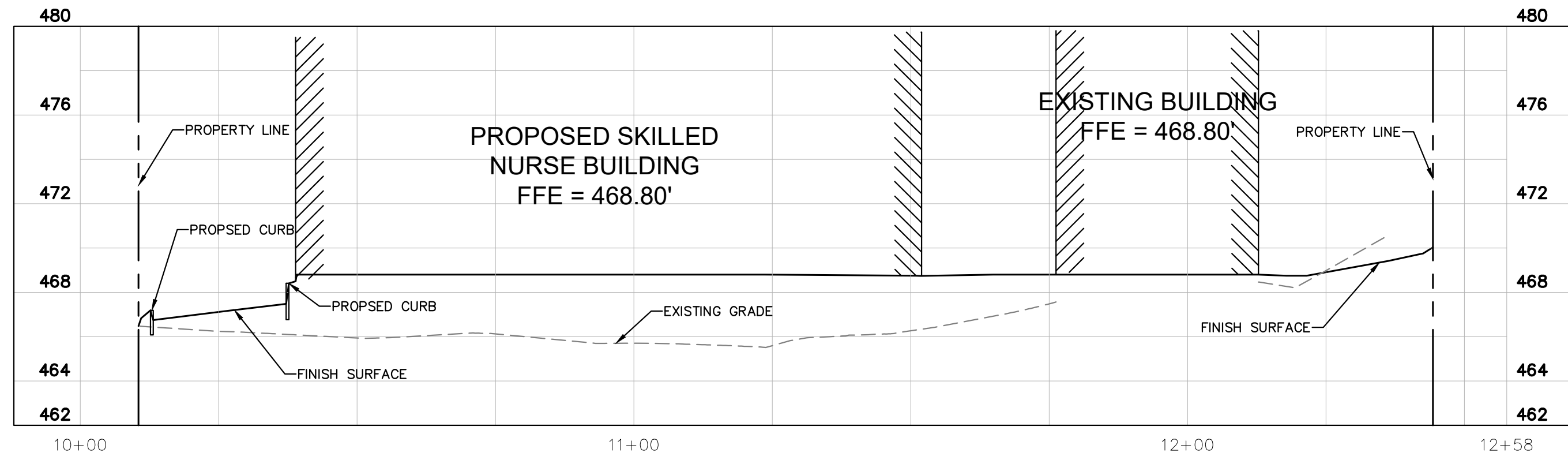
REV.	SYMBOL	DESCRIPTION OF CHANGE	R.C.E.	DATE	P.D.E.	DATE

DESIGNED BY:	SL	DATE
DRAWN BY:	SL	DATE
CHECKED BY:	KK	DATE

ENGINEER'S SEAL

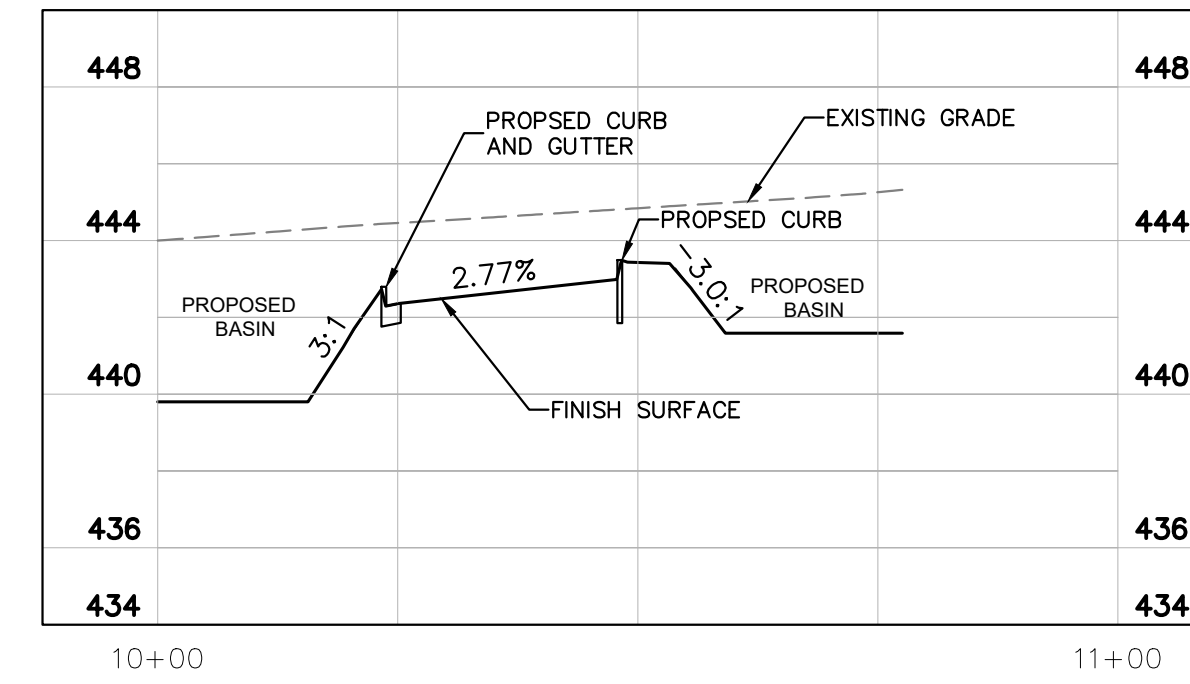
PREPARED BY:
KYLE KOIVUNIEMI, PE
REGISTERED ENGINEER

58449
RCE NUMBER



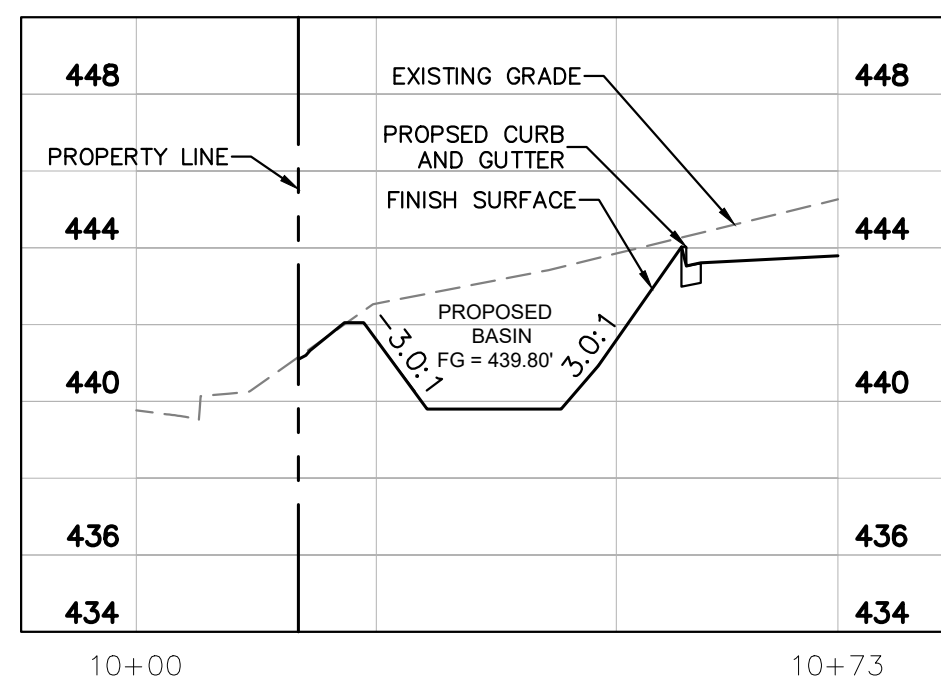
SECTION D-D:

SCALE: V: 1" = 5'
H: 1" = 20'



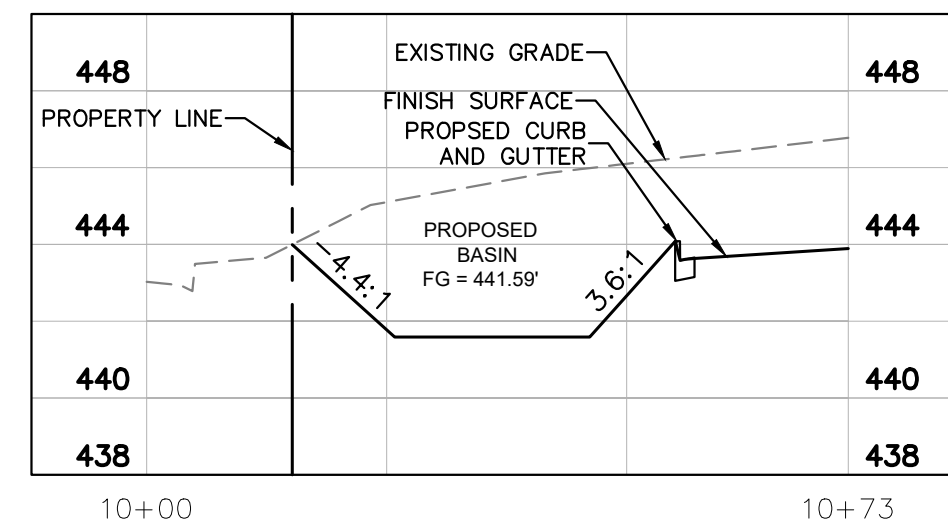
SECTION E-E:

SCALE: V: 1" = 5'
H: 1" = 20'



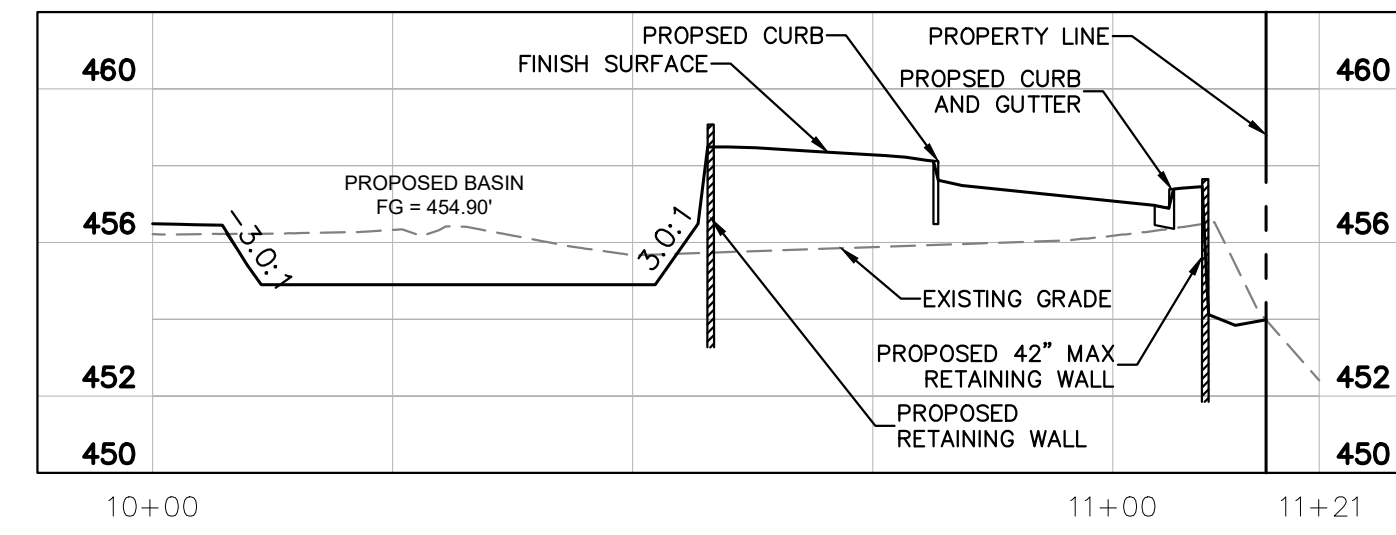
SECTION F-F:

SCALE: V: 1" = 5'
H: 1" = 20'



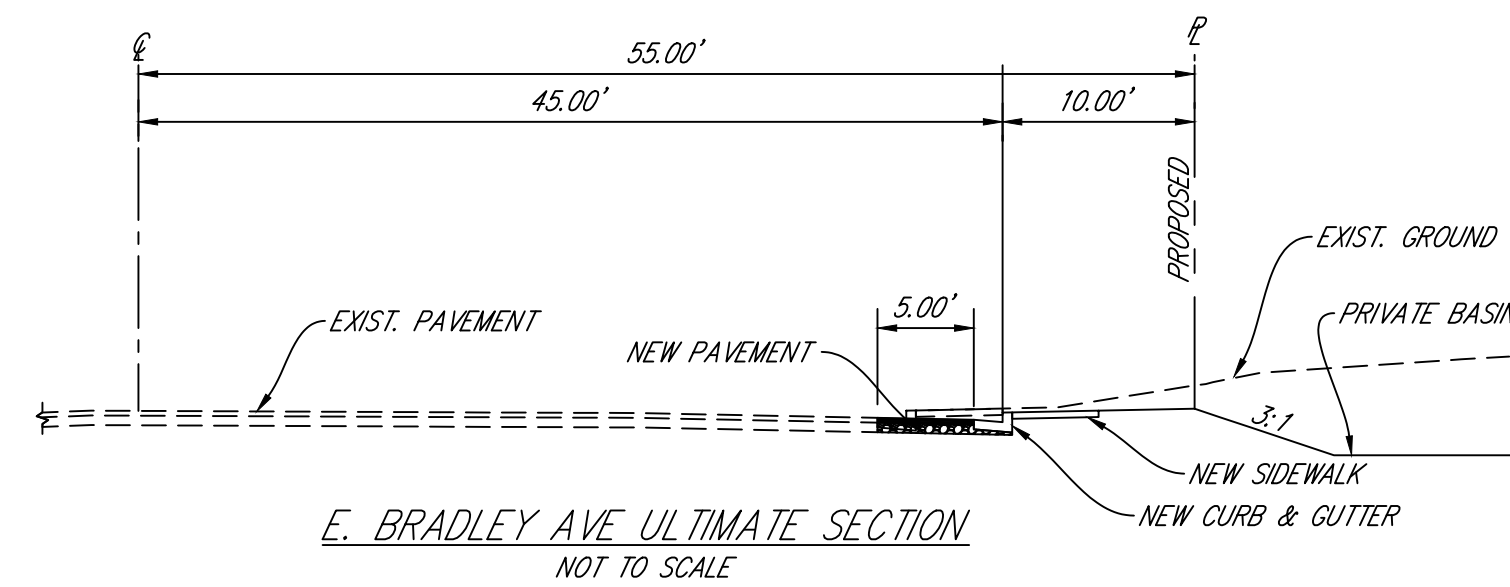
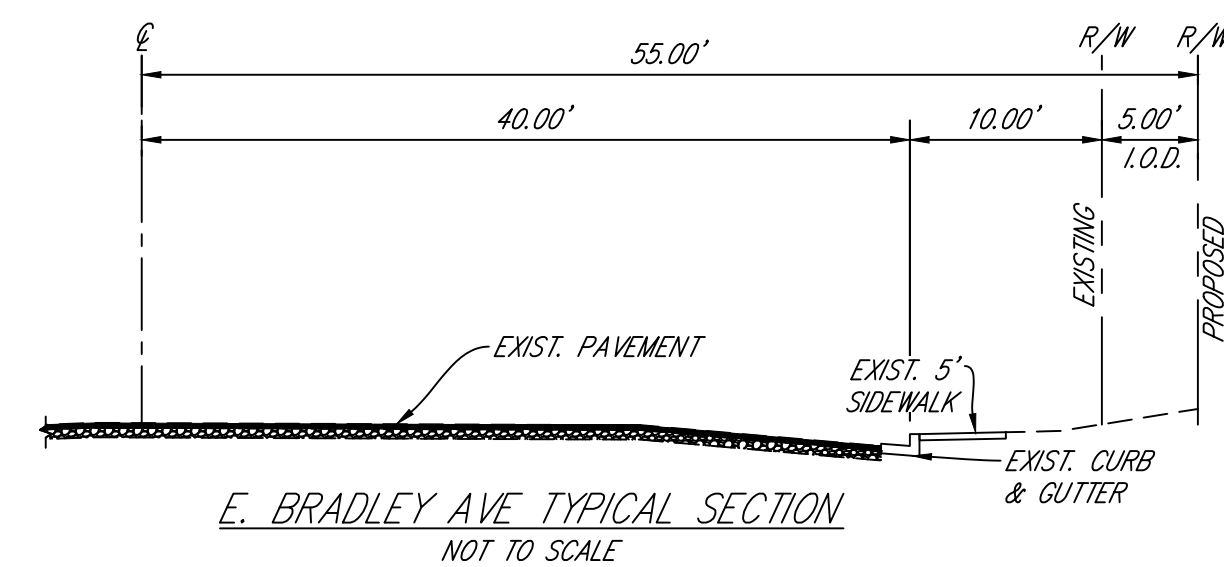
SECTION H-H:

SCALE: V: 1" = 5'
H: 1" = 20'



SECTION I-I:

SCALE: V: 1" = 5'
H: 1" = 20'



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UNDERGROUND SERVICE ALERT OF SOUTHERN CALIFORNIA

DIAL TOLL FREE
8 1 1

AT LEAST TWO DAYS
BEFORE YOU DIG

REV.	SYMBOL	DESCRIPTION OF CHANGE	R.C.E.	DATE	P.D.E.	DATE

DESIGNED BY:	SL	DATE
DRAWN BY:	SL	DATE
CHECKED BY:	KK	DATE

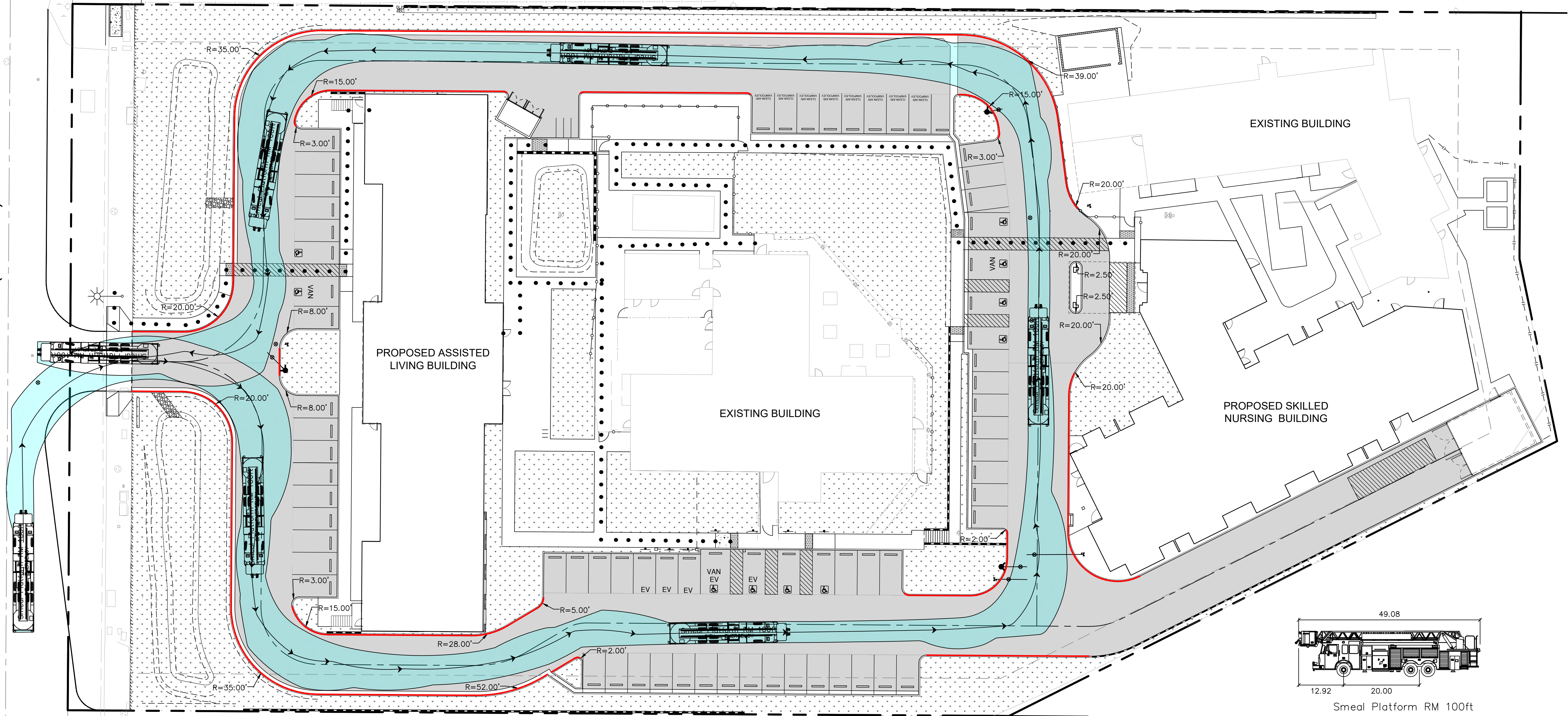
ENGINEER'S SEAL

PREPARED BY:
KYLE KOIVUNIEMI, PE
REGISTERED ENGINEER

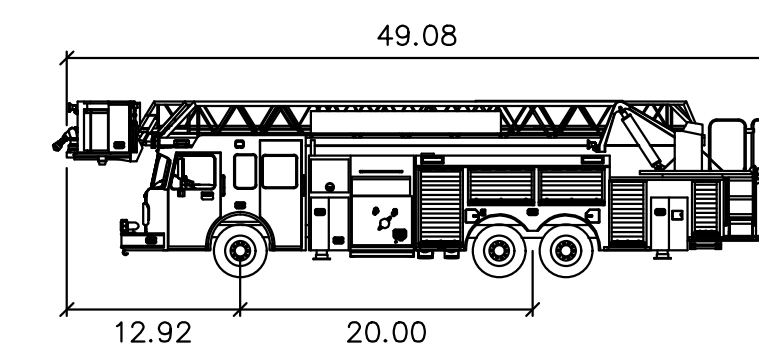
58449
RCE NUMBER

COUNTY APPROVED CHANGES			PRIVATE CONTRACT		
DESCRIPTION:	APPROVED BY:	DATE:	SHEET	COUNTY OF SAN DIEGO DEPARTMENT OF PUBLIC WORKS	9 SHEETS
GRADING PLAN FOR:					
SECTIONS					
CALIFORNIA COORDINATE INDEX					
APPROVED DIRECTOR OF PUBLIC WORKS BY:	ENGINEER OF WORK R.C.E.		GRADING PERMIT NO.:		

E BRADLEY AVE (PUBLIC)



SAMS HILL ROAD (PRIVATE)



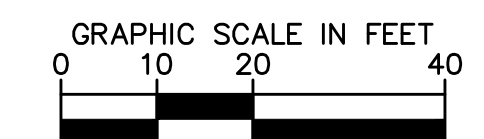
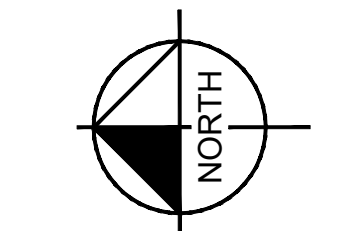
Smeal Platform RM 100ft
feet
Width : 8.33
Track : 7.83
Lock to Lock Time : 6.0
Steering Angle : 48.0

ENGINEER'S NOTES:

1. FIRE ACCESS ROADWAY SHALL BE DESIGNED, CONSTRUCTED AND MAINTAINED TO MEET THE 94,000 POUND, ALL-WEATHER REQUIREMENT.
2. ALL VEGETATION AND OTHER OBSTRUCTIONS OVERHANGING A FIRE ACCESS ROADWAY SHALL BE MAINTAINED TO A CLEAR HEIGHT OF 13'-6".

LEGEND

- PROPERTY LINE
- CENTER LINE
- EASEMENT OR SETBACK LINE
- CIVIL LIMIT OF WORK LINE
- LIMITS OF FIRE TRUCK TURN
- CONCRETE SITEWALK PAVEMENT.
- HEAVY DUTY ASPHALT PAVEMENT.
- PROPOSED FIRE HYDRANT.
- FIRE LANE RED CURB



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UNDERGROUND SERVICE ALERT OF SOUTHERN CALIFORNIA

REV.	SYMBOL	DESCRIPTION OF CHANGE	R.C.E.	DATE	P.D.E.	DATE

DESIGNED BY: SL DATE	ENGINEER'S SEAL
DRAWN BY: SL DATE	
CHECKED BY: KK DATE	

PREPARED BY: KYLE KOIVUNIEMI, PE REGISTERED ENGINEER	58449 RCE NUMBER
--	---------------------

COUNTY APPROVED CHANGES			PRIVATE CONTRACT		
DESCRIPTION:	APPROVED BY:	DATE:	SHEET	COUNTY OF SAN DIEGO DEPARTMENT OF PUBLIC WORKS	9 SHEETS
GRADING PLAN FOR:			AUTOTURN EXHIBIT		
CALIFORNIA COORDINATE INDEX			APPROVED DIRECTOR OF PUBLIC WORKS BY:		
			ENGINEER OF WORK R.C.E.		
			GRADING PERMIT NO.:		

BRADLEY AVENUE

DMA AND BIOFILTRATION BASIN EXHIBIT

WATER QUALITY BASIN INSTALLATION NOTES:

- 3 INCHES OF WELL-AGED, SHREDDED HARDWOOD MULCH.
- AN UNDERDRAIN CLEANOUT WITH A MINIMUM 6-INCH DIAMETER AND LOCKABLE CAP IS PLACED EVERY 250 TO 300 FEET AS REQUIRED BASED ON UNDERDRAIN LENGTH.
- VEGETATION USED SHOULD BE SUITABLE FOR THE CLIMATE PER LANDSCAPE PLANS
- FILTER COARSE IS A MINIMUM OF 6 INCHES PROVIDED IN TWO SEPARATE 3 INCH LAYERS. THE TOP LAYER SHALL BE MADE OF ASTM C33 CHOKER SAND AND THE BOTTOM LAYER BE OF ASTM NO. 8 AGGREGATE. MARKERS STAKES SHALL BE USED TO ENSURE UNIFORM LIFT THICKNESS.
- AASHTO NO. 57 STONE OR CLASS 2 PERMEABLE PER CAL TRANS SPECIFICATION 68-1.025 IS RECOMMENDED FOR THE AGGREGATE STORAGE LAYER. WASHED, OPEN-GRADED CRUSHED ROCK MAY BE USED, HOWEVER, A 4 INCH MINIMUM WASHED PEA GRAVEL FILTER COURSE LAYER AT THE TOP OF THE CRUSHED ROCK IS REQUIRED.
- IMPERMEABLE LINER SHALL BE INSTALLED WHEN THE BIOFILTRATION BASIN IS WITHIN 10 FEET OF RETAINING WALLS OR BUILDING FOUNDATIONS, OR AS RECOMMENDED BY THE SOILS ENGINEER, OR REQUIRED BY THESE PLANS. IMPERMEABLE LINER SHALL BE 30 MIL THICK (PER COUNTY OF SAN DIEGO GREEN STREETS DESIGN STANDARD DRAWING GS-3.00 AND COUNTY GREEN STREETS SUPPLEMENT TO CAL TRANS SPECIFICATIONS 20-11.08B) CONFIGURED TO ENTIRELY ENCOMPASS THE SIDES OF THE WATER QUALITY BASIN.
- IMPERMEABLE LINER BE CONSTRUCTED IN COMPLIANCE WITH THE COUNTY OF SAN DIEGO GREEN STREETS SUPPLEMENT TO CAL TRANS SPECIFICATIONS 20-11.08B.
- BIOFILTRATION SOIL MEDIA LAYER (BSM) SHALL CONSIST OF 60% TO 80% BY VOLUME SAND, UP TO 20% BY VOLUME TOPSOIL, AND UP TO 20% BY VOLUME COMPOST (PER COUNTY OF SAN DIEGO BMP DESIGN MANUAL SEPTEMBER 2020 APPENDIX F.2 SECTION 903-2 BLENDED BSM CRITERIA AND TESTING REQUIREMENTS) PLACED IN 6" LIFTS AND COMPACTED WITH WATER PRIOR TO THE NEXT LIFT. INITIAL PERMEABILITY SHALL BE 8" PER HOUR (WITH ASSUMED STABILIZED PERMEABILITY OF 5" PER HOUR).
- THE AGGREGATE STORAGE LAYER SHALL BE COMPACTED IN ACCORDANCE WITH SOILS ENGINEER'S RECOMMENDATIONS.
- OVERFLOW STRUCTURE TO HAVE A MINIMUM OF 12 INCHES OF FREEBOARD.
- ALL LINER INSTALLATIONS, FIELD WELDING OF SEAMS, AND OBSERVATION OF SOIL MIX PLACEMENT SHALL REQUIRE SPECIAL INSPECTION BY THE PROJECT GEOTECHNICAL ENGINEER OR OTHER QUALIFIED PERSON. A LETTER CERTIFYING PROPER INSTALLATION SHALL BE PROVIDED TO THE ENGINEER OF RECORD TO ACCEPTANCE OF THE FACILITIES.
- SPECIAL INSPECTION SHALL BE REQUIRED FOR CONSTRUCTION OF ALL BIOFILTRATION BASINS. INSPECTION SHALL BE PERFORMED BY A QUALIFIED INDIVIDUAL (SUCH AS: ENGINEER OF RECORD, OSD). INSPECTION SHALL INCLUDE:
 - VERIFICATION OF OVERALL DIMENSIONS PRIOR TO PLACEMENT OF MATERIALS;
 - PLACEMENT OF THE LINER, IF REQUIRED; AND SEAMS OR PENETRATIONS
 - PLACEMENT OF THE GRAVEL, FILTER MATERIALS, AND FILTER MEDIA;
 - ALL INLET AND OUTLET STRUCTURES INCLUDING UNDERDRAINS, IF REQUIRED.
 - CONTRACTOR SHALL TAKE PICTURES AT EACH STAGE OF INSTALLATION AND SUBMITTED TO ENGINEER FOR VERIFICATION OF INSTALL.

- INSPECTOR SHALL BE GIVEN A MINIMUM OF 48 HOURS PRIOR TO INSPECTION. UPON COMPLETION THE INSPECTOR SHALL PROVIDE A CERTIFICATION TO THE ENGINEER OF WORK.

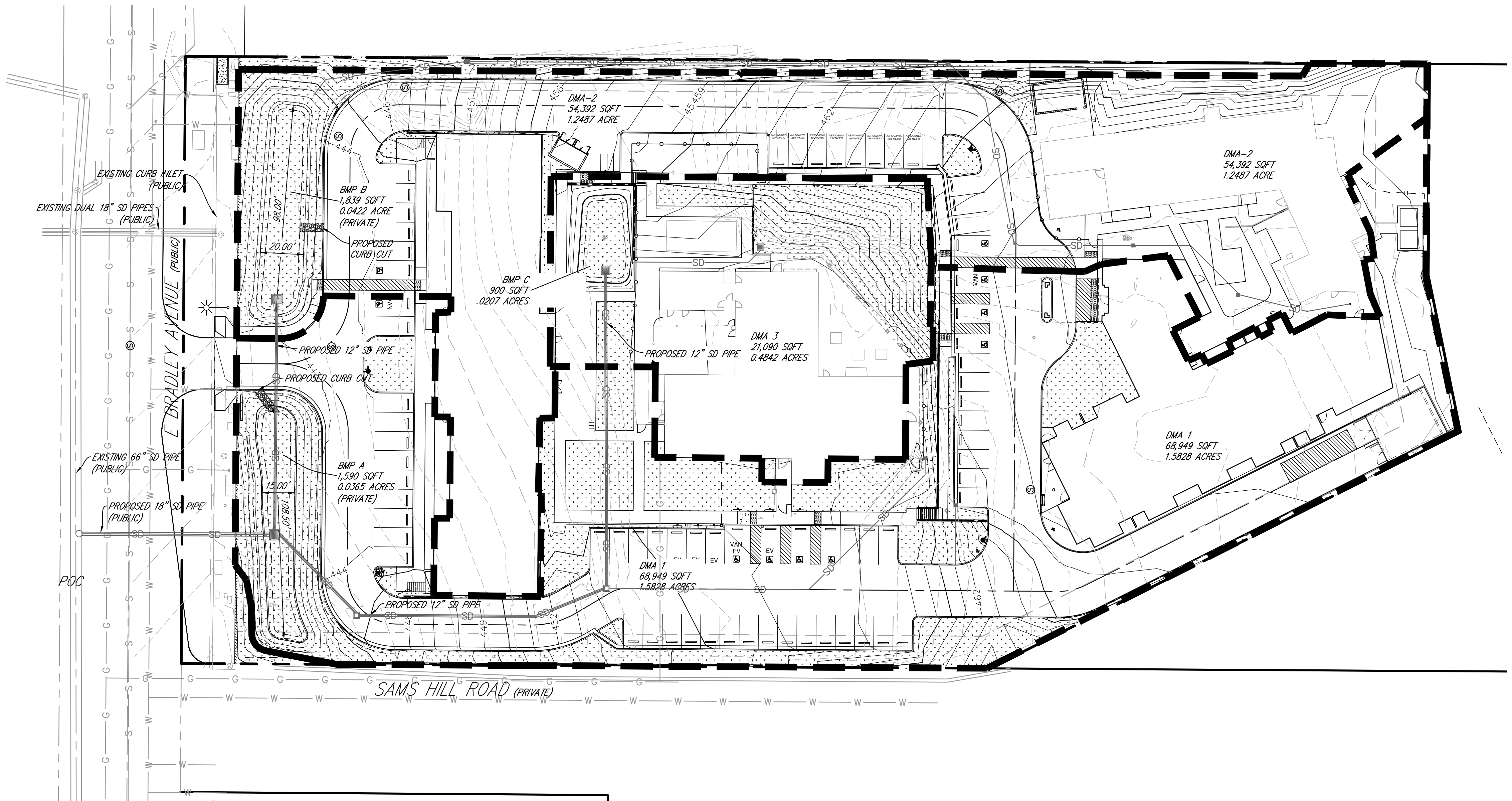
- PROPOSED MATERIALS, SUCH AS AGGREGATE, FILTER MATERIAL, AND FILTER MEDIA SHALL BE SUBMITTED TO THE ENGINEER OF WORK FOR APPROVAL.

SELF-MITIGATING DMAS:

- VEGETATION IN THE NATURAL OR LANDSCAPED AREA IS NATIVE AND/OR NON-NATIVE/NON-INVASIVE DROUGHT TOLERANT SPECIES THAT DO NOT REQUIRE REGULAR APPLICATION OF FERTILIZERS AND PESTICIDES.
- SOILS ARE UNDISTURBED NATIVE TOPSOIL, OR DISTURBED SOILS THAT HAVE BEEN AMENDED AND AERATED TO PROMOTE WATER RETENTION CHARACTERISTICS EQUIVALENT TO UNDISTURBED NATIVE TOPSOIL.
- THE INCIDENTAL IMPERVIOUS AREAS ARE LESS THAN 5 PERCENT OF THE SELF-MITIGATING AREA.
- IMPERVIOUS AREA WITHIN THE SELF-MITIGATED AREA SHOULD NOT BE HYDRAULICALLY CONNECTED TO OTHER IMPERVIOUS AREAS UNLESS IT IS A STORM WATER CONVEYANCE SYSTEM (SUCH AS A BROW DITCH).
- THE SELF-MITIGATING AREA IS HYDRAULICALLY SEPARATE FROM DMAS THAT CONTAIN PERMANENT STORM WATER POLLUTANT CONTROL BMFS.

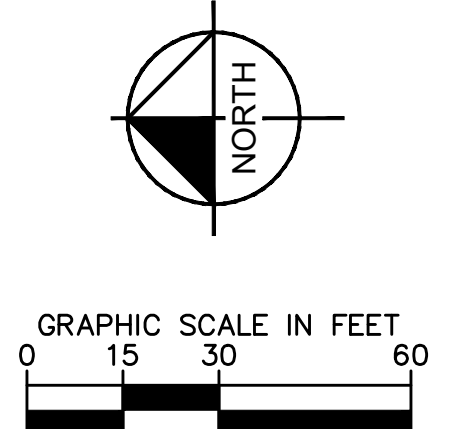
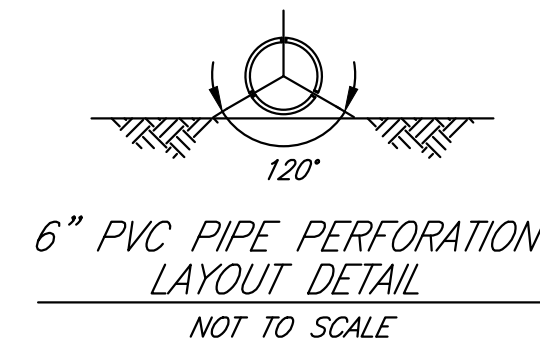
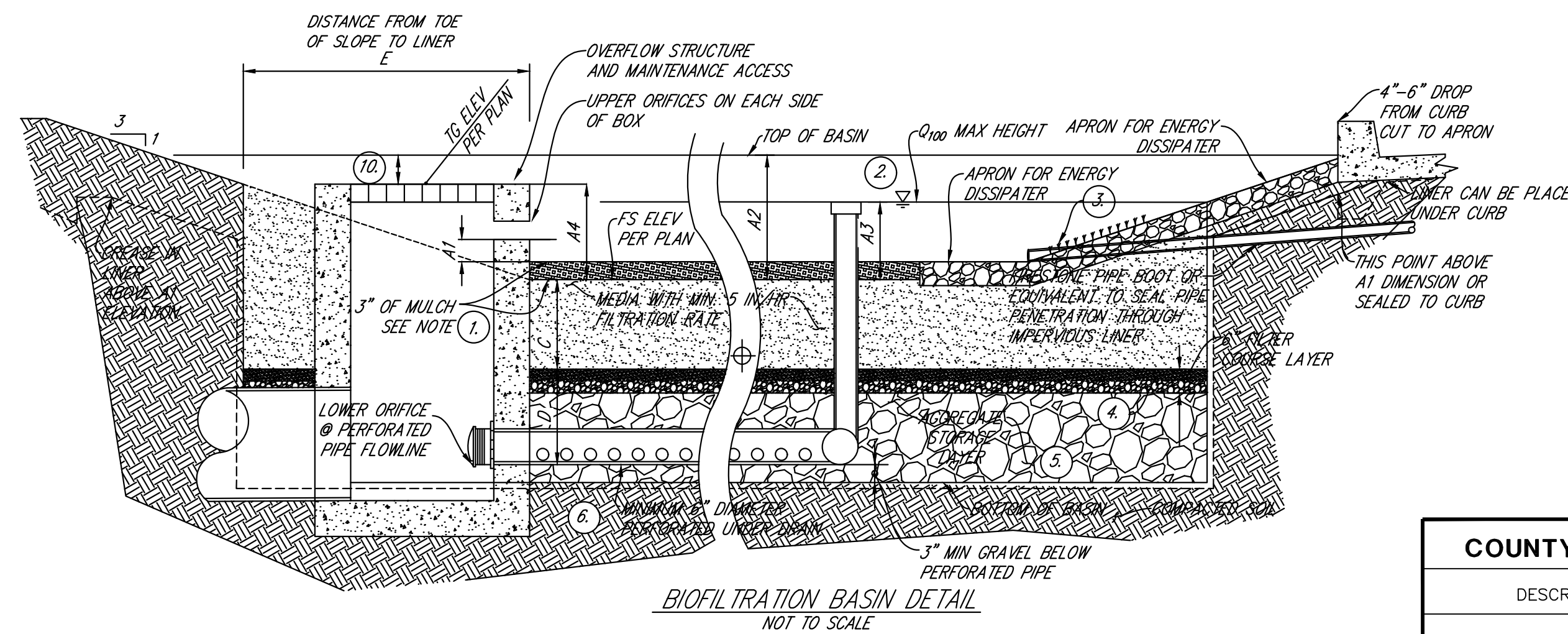
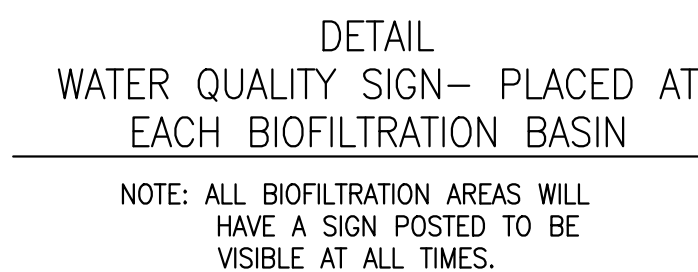
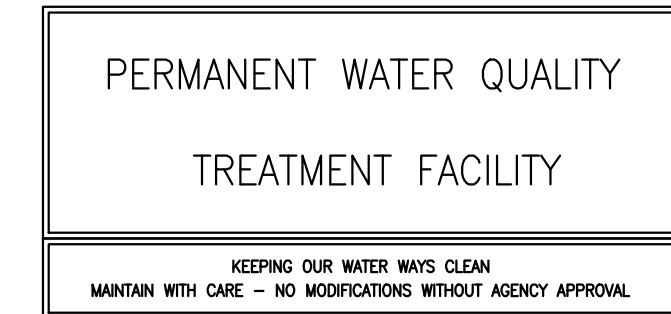
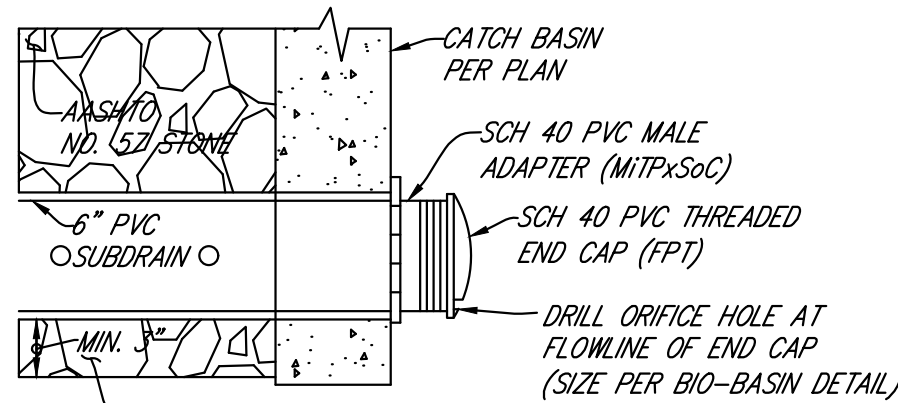
HYDROLOGIC SOIL GROUP

THE HYDROLOGICAL SOIL GROUP FOR THIS SITE IS TYPE D.



BMP NAME	TYPE OF BMP	EFFECTIVE AREA (SQFT)	A1 (INCH) WATER QUALITY	A2 (INCH) TOP OF BASIN	A3 (INCH) 0100 MAX HEIGHT	A4 (INCH) TOP OF RISER	C (INCH) MEDIA	D (INCH) GRAVEL	E (INCH) OFFSET	BOX RISER OVERFLOW STRUCTURE SIZE (INCHES)	ORIFICES DIAMETER UPPER (INCH)	ORIFICES DIAMETER LOWER (1/16 INCH)	IMPERMEABLE LINER ?
BMP-A	BIOFILTRATION	1,590	6	26	15	15	18	12	27	48X48	2X21	15	YES
BMP-B	BIOFILTRATION	1,839	6	24	13	12	18	12	27	48X48	1X36	17	YES
BMP-C	BIOFILTRATION	900	6	12	10	9	18	12	27	24X24	-	12	YES

DMA ID	DMA TYPE	OUTLET	IMPERVIOUS AREA (SQFT)	PERVIOUS AREA (SQFT)	TOTAL (SQFT)	TOTAL (ACRES)	% IMP
DMA-1	DRAINS TO BMP	BMP-1	47,865	21,084	68,949	1.583	69
DMA-2	DRAINS TO BMP	BMP-2	41,177	13,215	54,392	1.249	76
DMA-3	DRAINS TO BMP	BMP-3	12,221	8,869	21,090	0.484	58



COUNTY APPROVED CHANGES			PRIVATE CONTRACT		
DESCRIPTION:	APPROVED BY:	DATE:	SHEET	COUNTY OF SAN DIEGO DEPARTMENT OF PUBLIC WORKS	9 SHEETS
			GRADING PLAN FOR: DMA AND BIOFILTRATION BASIN EXHIBIT		
			CALIFORNIA COORDINATE INDEX		
			APPROVED DIRECTOR OF PUBLIC WORKS BY:	ENGINEER OF WORK	R.C.E.
			GRADING PERMIT NO.:		

811
Know what's below.
Call before you dig.
DIAL TOLL FREE 811
AT LEAST TWO DAYS BEFORE YOU DIG.
UNDERGROUND SERVICE ALERT OF SOUTHERN CALIFORNIA

REV.	SYMBOL	DESCRIPTION OF CHANGE	R.C.E.	DATE	P.D.E.	DATE

DESIGNED BY: SL DATE	PREPARED BY: KYLE KOIVUNIEMI, PE REGISTERED ENGINEER
DRAWN BY: SL DATE	58449 RCE NUMBER
CHECKED BY: KK DATE	ENGINEER'S SEAL

SITE INFORMATION:

APN(S): 387-142-36-00
 LAND AREA: 3.4 ACRES/ 147,886.26 SF
 GROSS AREA: 3.36 ACRES/ 146,465.97 SF
 NET AREA:
 ZONING: RU - RESIDENTIAL URBAN
 ADDRESS: 675 EAST BRADLEY AVENUE
 EL CAJON, CA 92021
 OWNER: MR. THOMAS JURBALA
 EL CAJON REAL ESTATE, LLC
 6 HUTTON CENTRE DRIVE, SUITE 400
 SANTA ANA, CA 92707

EXISTING BUILDING 1 SKILLED NURSING DATA:

EXISTING USE: SKILLED NURSING FACILITY
 OCCUPANCY: I-2 (W/ DELAYED EGRESS)
 CONSTRUCTION TYPE: VA
 FIRE SPRINKLERED: YES
 STORIES: 1
 AREA: ±6,950 S.F.
 EXISTING BEDS: 28 BEDS

EXISTING BUILDING 2 SKILLED NURSING DATA:

PROPOSED USE: SKILLED NURSING FACILITY
 OCCUPANCY: I-2 (W/ DELAYED EGRESS)
 CONSTRUCTION TYPE: VA
 FIRE SPRINKLERED: YES
 STORIES: 1
 AREA: ±6,500 S.F.
 EXISTING BEDS: 28 BEDS

NEW BUILDING 3 SKILLED NURSING DATA:

PROPOSED USE: SKILLED NURSING FACILITY
 OCCUPANCY: I-2 (W/ DELAYED EGRESS)
 CONSTRUCTION TYPE: VA
 FIRE SPRINKLERED: YES
 STAFF: 8
 STORIES: 1
 AREA: ±11,048 S.F.

ROOM/BED COUNT:
 (1) PRIVATE: 1 BEDS
 (15) SEMI PRIVATE: 30 BEDS
TOTAL BEDS: 31 BEDS

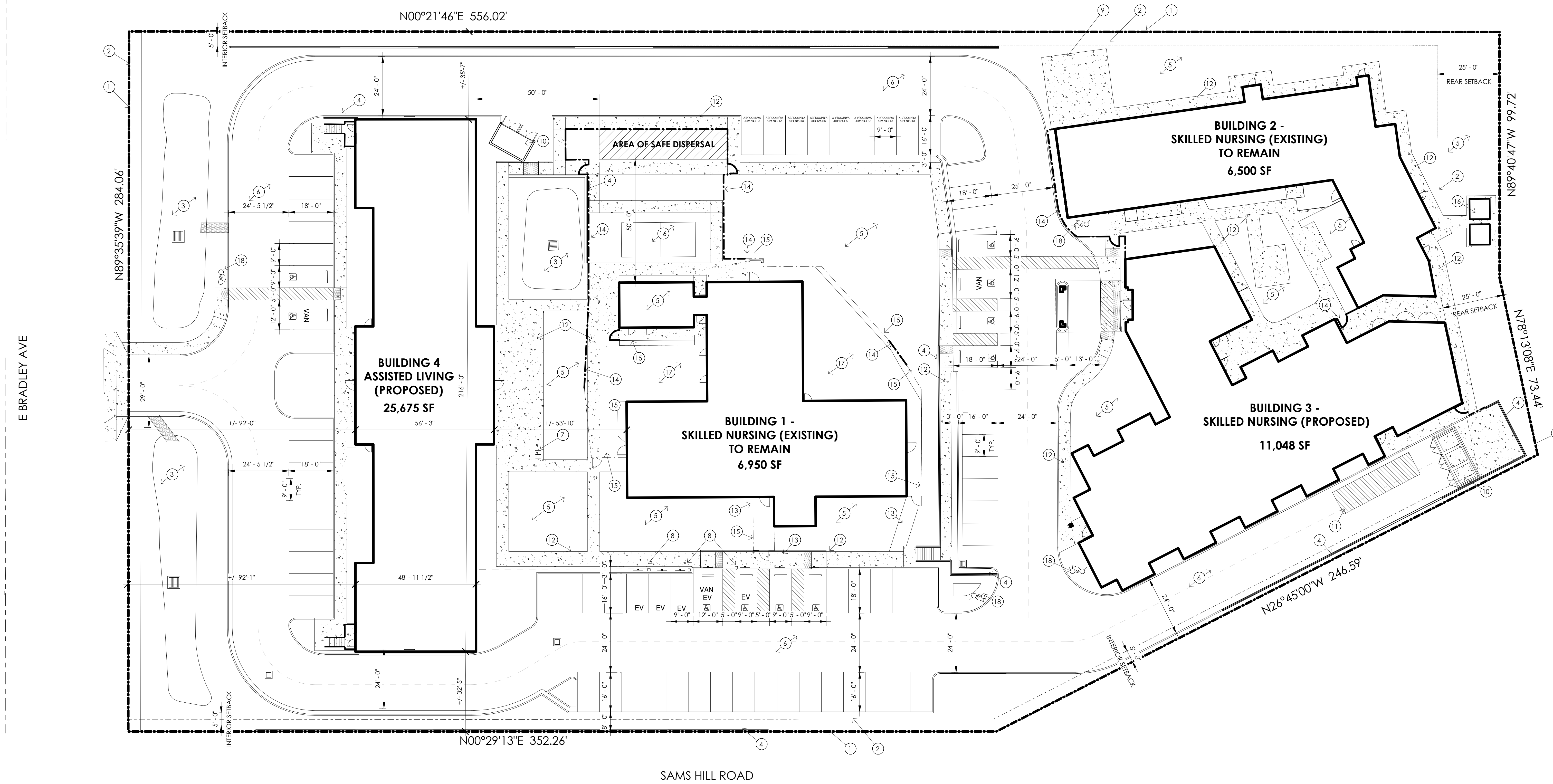
NEW ASSISTED LIVING FACILITY DATA :

PROPOSED USE: ASSISTED LIVING FACILITY
 OCCUPANCY: R-2.1
 CONSTRUCTION TYPE: VA
 FIRE SPRINKLERED: YES
 STAFFS: 8
 STORIES: 2 W/ BASEMENT
 TOTAL AREA: ±25,675 S.F.

ROOM/BED COUNT:
 (42) PRIVATE UNITS: 42 BEDS
 (12) PRIVATE UNITS: 24 BEDS
TOTAL BEDS: 66 BEDS

PARKING TABULATION:

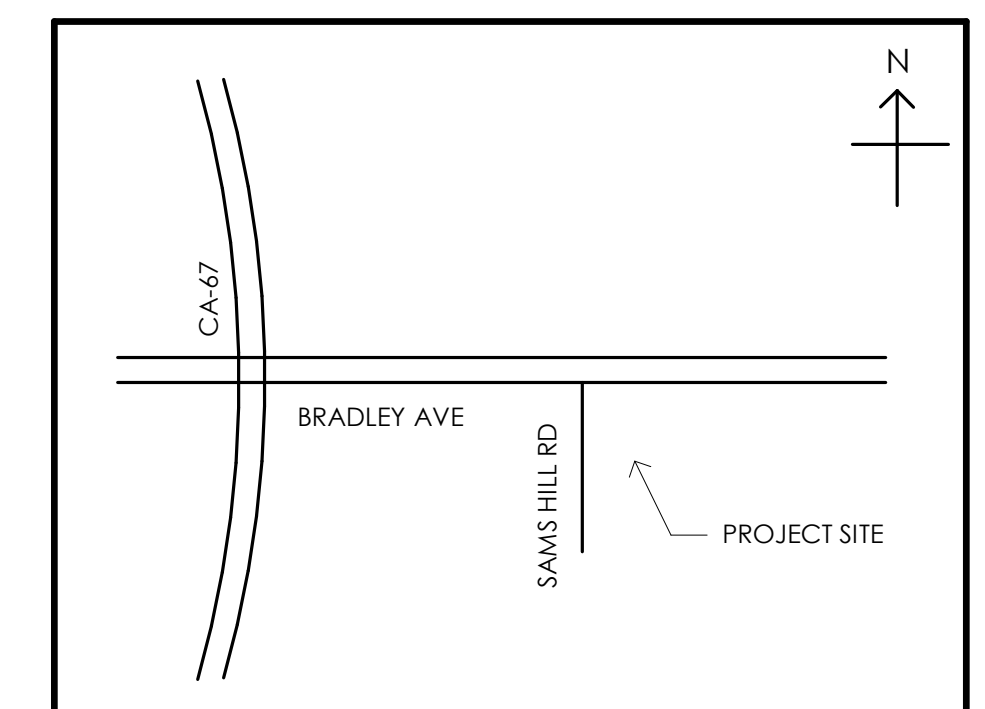
REQUIRED PARKING:
 MEDICAL CARE FACILITIES 0.33 PER BED: 153X0.33= 50.49
TOTAL PARKING REQUIRED: 50
 PARKING PROVIDED:
 STANDARD SPACES 53
 CLEAN AIR / ELECTRICAL VEHICLE SPACE 8
 ELECTRIC VEHICLE CHARGING SPACE 3
 ACCESSIBLE ELECTRIC VEHICLE CHARGING SPACE 2
 ACCESSIBLE PARKING SPACES 8
TOTAL PARKING PROVIDED: 74
TOTAL BICYCLE SPACES PROVIDED: 3



KEYNOTES

- 1 PROPERTY LINE
- 2 SETBACK
- 3 BIO-BASIN
- 4 CMU RETAINING WALL (SEE CIVIL FOR HEIGHT)
- 5 LANDSCAPE
- 6 ASPHALT PAVING
- 7 BICYCLE PARKING
- 8 EV CHARGER AND UNDERGROUND CONDUIT
- 9 GENERATOR ENCLOSURE W/ 8'-0" H. SOLID GROUTED CMU W/ PLASTER FINISH TO MATCH BUILDING ADDITION
- 10 COVERED TRASH ENCLOSURE PER COUNTY OF SAN DIEGO STANDARDS
- 11 10' X 35' LOADING SPACE
- 12 CONCRETE SIDEWALK
- 13 EXISTING CONCRETE SIDEWALK
- 14 7'-0" H. CHAIN LINK FENCE
- 15 EXISTING 7'-0" H. CHAIN LINK FENCE
- 16 EXISTING STORAGE SHEDS
- 17 EXISTING CONCRETE PATIO
- 18 FIRE APPURTENANCES

VICINITY MAP



SKILLED NURSING FACILITY (PROPOSED) + ASSISTED LIVING (PROPOSED)

BRADLEY TERRACES

ARCHITECTURE PLOT PLAN

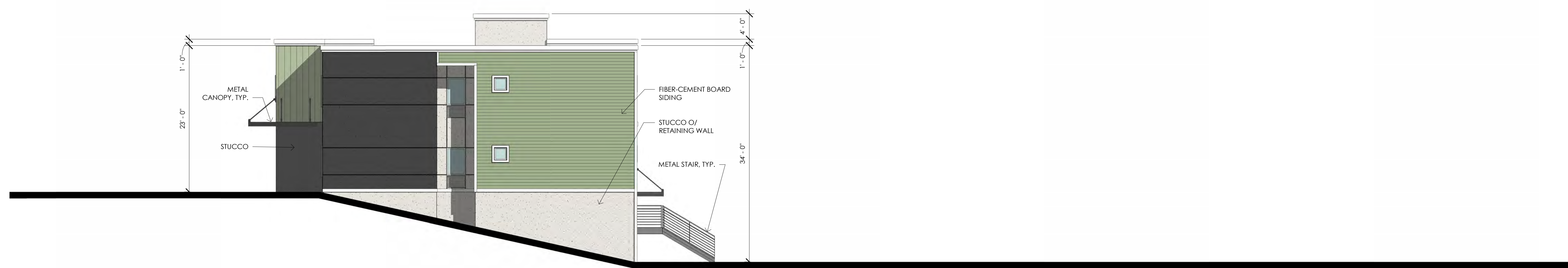
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 321 NORTH RAMPART STREET, SUITE 101
 ORANGE, CA 92668 . P: 714.937.1985
 PROJECT#: 20090 . 10/24/2022



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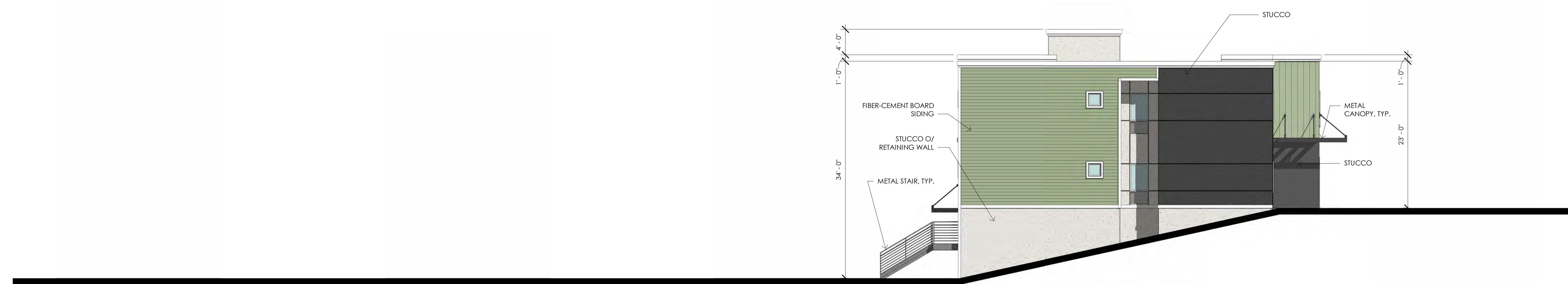
BUILDING 4 - ASSISTED LIVING (PROPOSED) - NORTH ELEVATION



BUILDING 4 - ASSISTED LIVING (PROPOSED) - EAST ELEVATION



BUILDING 4 - ASSISTED LIVING (PROPOSED) - SOUTH ELEVATION



BUILDING 4 - ASSISTED LIVING (PROPOSED) - WEST ELEVATION

SKILLED NURSING FACILITY (PROPOSED) + ASSISTED LIVING (PROPOSED)

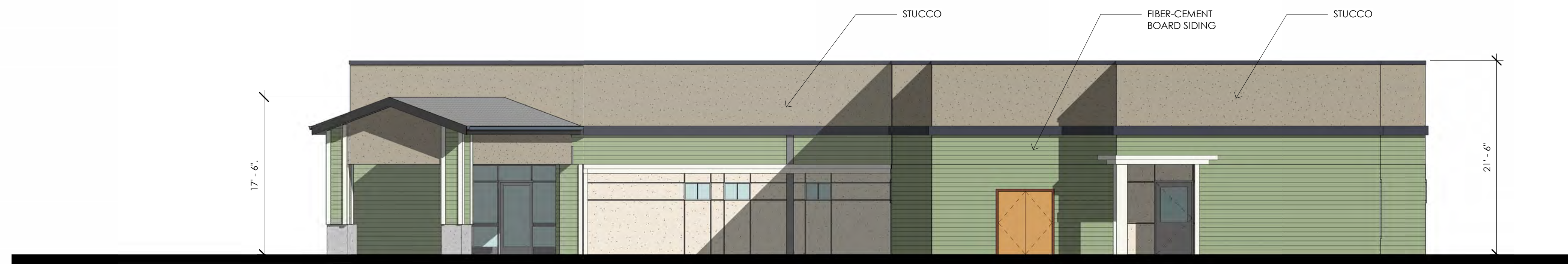
BRADLEY TERRACES

BUILDING 4 - ASSISTED LIVING (PROPOSED) - ELEVATIONS

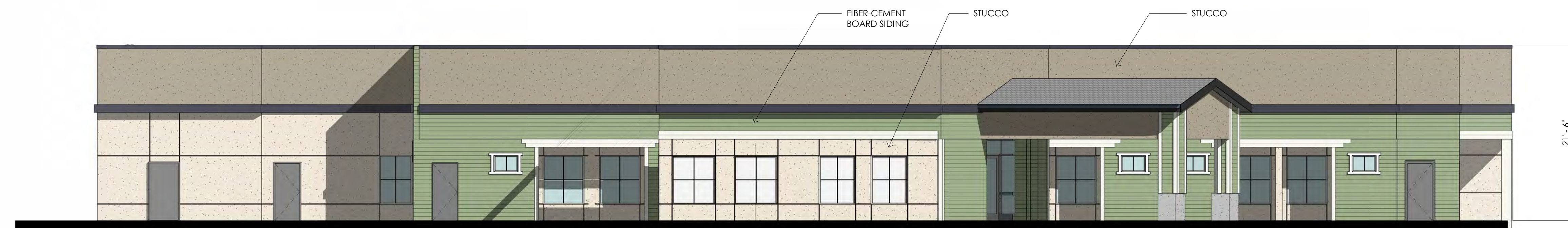
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 ORANGE, CA 92668 . P: 714.937.1985
 PROJECT#: 20090 . 08/10/23



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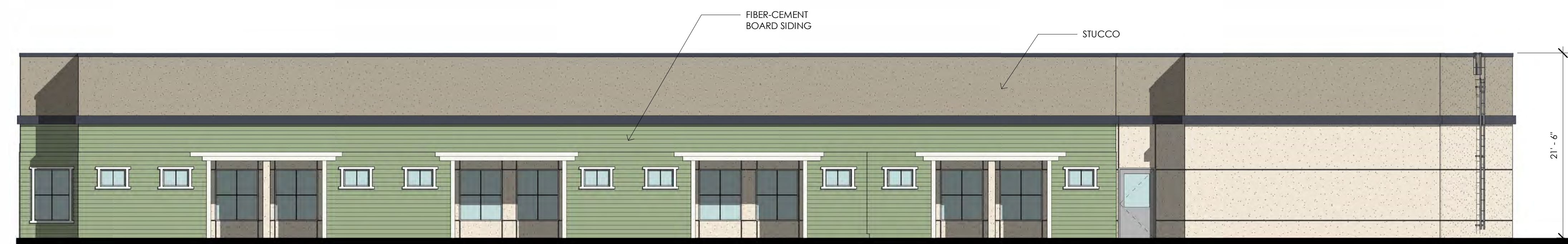
BUILDING 3 - SKILLED NURSING FACILITY - NORTH ELEVATION



BUILDING 3 - SKILLED NURSING FACILITY - EAST ELEVATION



BUILDING 3 - SKILLED NURSING FACILITY - SOUTH ELEVATION



BUILDING 3 - SKILLED NURSING FACILITY - WEST ELEVATION

SKILLED NURSING FACILITY ADDITION & REMODEL

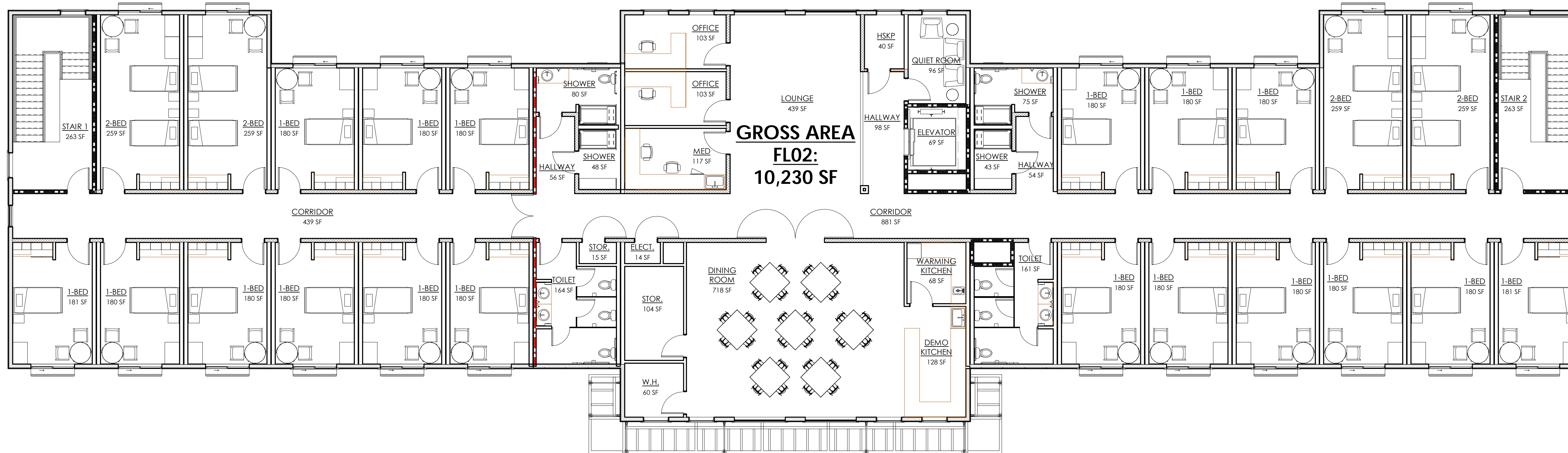
BRADLEY TERRACES

BUILDING 3 - SKILLED NURSING FACILITY - ELEVATIONS

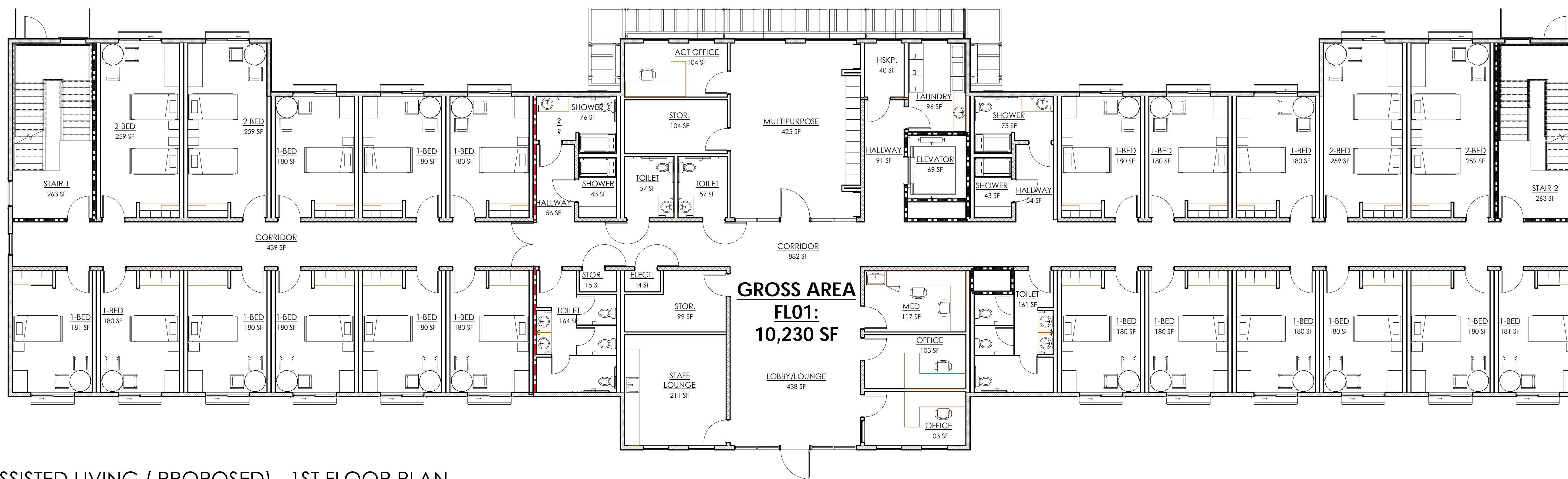
ARCHITECTURE + INTERIORS + PLANNING
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 ORANGE, CA 92668 · P: 714.937.1985
 PROJECT#: 20090 · C 08/10/23



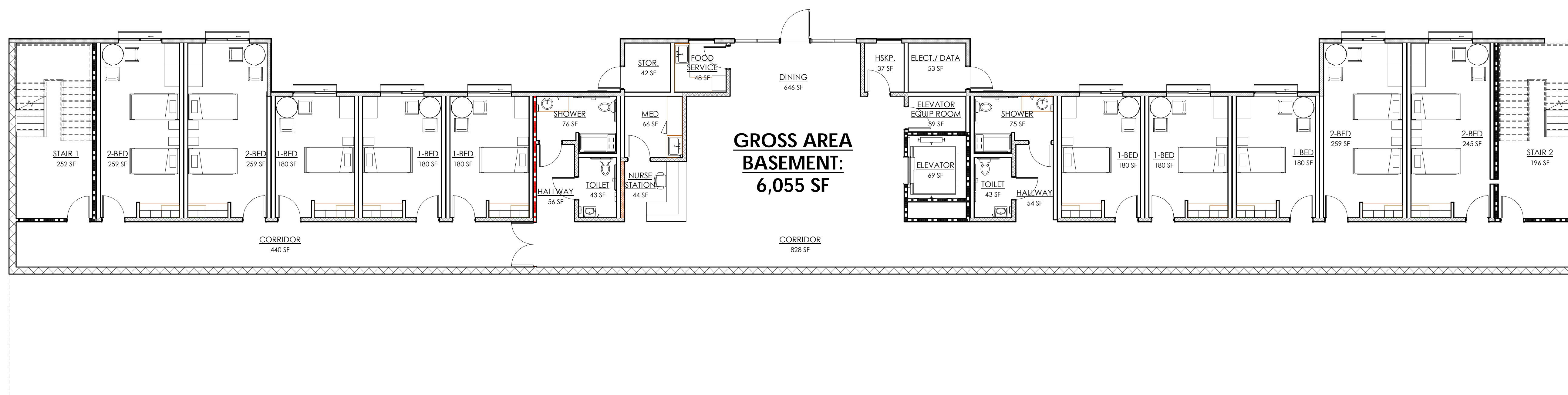
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BUILDING 4 - ASSISTED LIVING (PROPOSED) - 2ND FLOOR PLAN



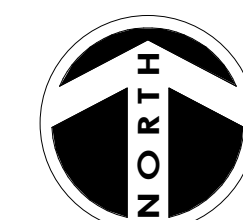
BUILDING 4 - ASSISTED LIVING (PROPOSED) - 1ST FLOOR PLAN



BUILDING 4 - ASSISTED LIVING (PROPOSED) - BASEMENT FLOOR PLAN

SKILLED NURSING FACILITY (PROPOSED) + ASSISTED LIVING (PROPOSED)

BRADLEY TERRACES



BUILDING 4 - ASSISTED LIVING (PROPOSED) - FLOOR PLAN

ARCHITECTURE + INTERIORS + PLANNING
 321 NORTH RAMPART STREET, SUITE 101
 ORANGE, CA 92668 . P: 714.937.1985
 PROJECT#: 20090 . 1 08/10/23





BRADLEY TERRACES ASSISTED LIVING FACILITY

ARCO CONSTRUCTION

PERSPECTIVE VIEWS - SOUTH WEST

ARCHITECTURE + INTERIORS + PLANNING
321 NORTH RAMPART STREET, SUITE 101
ORANGE, CA 92668 . P: 714.937.1985
PROJECT#: 20090 . 08/10/23





BRADLEY TERRACES ASSISTED LIVING FACILITY

ARCO CONSTRUCTION

PERSPECTIVE VIEWS - SOUTH

ARCHITECTURE + INTERIORS + PLANNING
321 NORTH RAMPART STREET, SUITE 101
ORANGE, CA 92668 . P: 714.937.1985
PROJECT#: 20090 . 08/10/23



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BRADLEY TERRACES ASSISTED LIVING FACILITY

ARCO CONSTRUCTION

PERSPECTIVE VIEWS - SOUTH EAST

ARCHITECTURE + INTERIORS + PLANNING
321 NORTH RAMPART STREET, SUITE 101
ORANGE, CA 92668 . P: 714.937.1985
PROJECT#: 20090 . 08/10/23





BRADLEY TERRACES ASSISTED LIVING FACILITY

ARCO CONSTRUCTION

PERSPECTIVE VIEWS - SITE AXON

ARCHITECTURE + INTERIORS + PLANNING
 321 NORTH RAMPART STREET, SUITE 101
 ORANGE, CA 92668 · P: 714.937.1985
 PROJECT#: 20090 · 08/10/23



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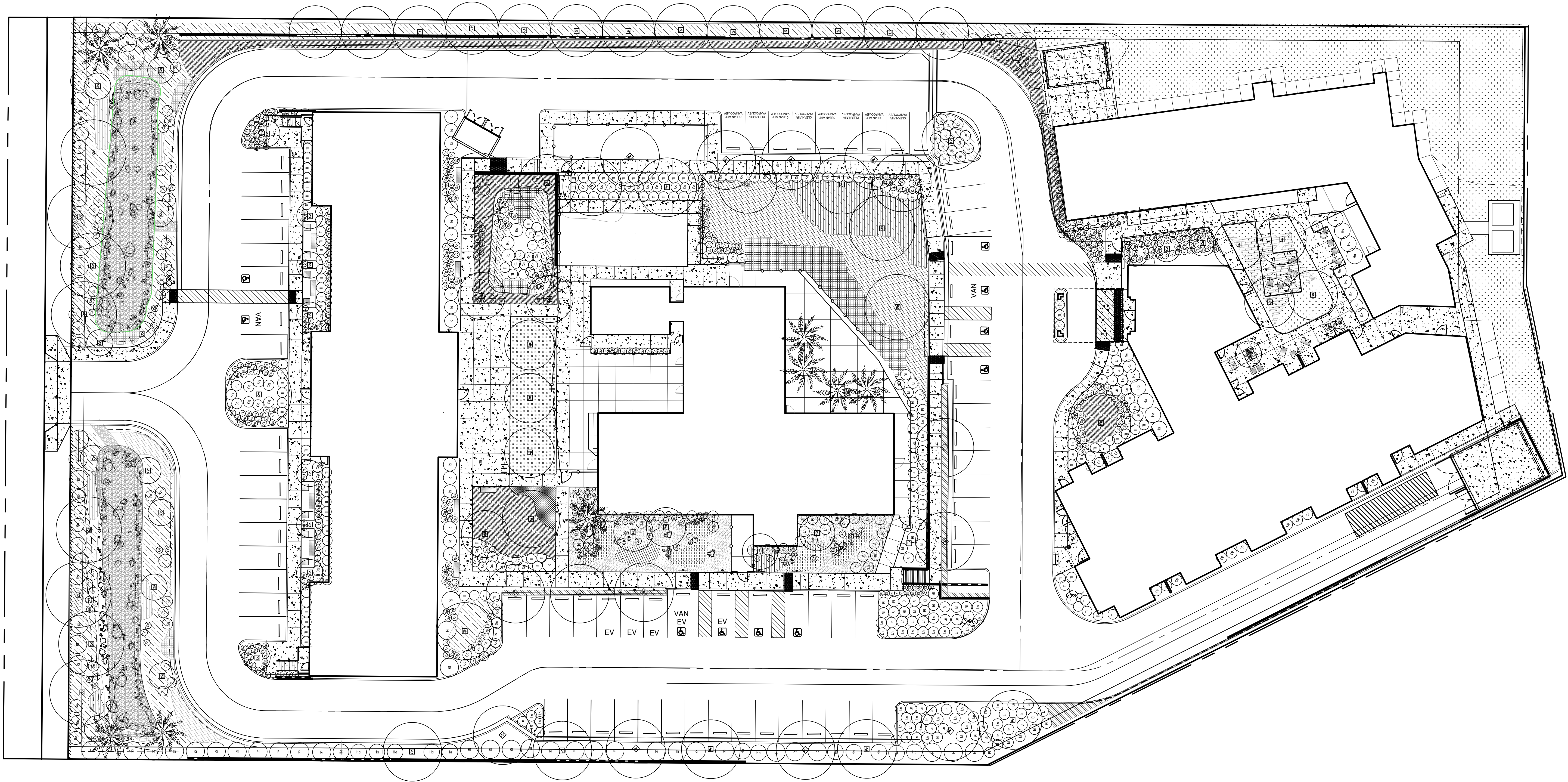
**BRADLEY COURT
HEALTHCARE CENTER**
675 E. BRADLEY AVE, EL CAJON
CA 92021

Consultants:

Approvals:

Revisions:

No.	Description	Date



1 PLANTING PLAN

SCALE: 1" = 20'-0"

PLANTING SCHEDULE										USDA ZONE : 9, SUNSET ZONE:22		
SYMBOL	QTY.	SIZE	BOTANICAL NAME	COMMON NAME	DETAIL	REMARKS/ALTERNATES	WUCOLS	SPACING	CALIFORNIA NATIVE			
E	1	-	EXISTING SCHINUS TEREBINTHIFOLIA	BRAZILIAN PEPPERTREE	(X)	EXISTING TREE TO REMAIN	X		N			
Tr	7	-	PALM TREES	-	(-)	TBS BY OWNER	X					
AB	5	24"	ARBRUTUS UNEDO	STRAWBERRY TREE	(AB)	STANDARD	LOW		N			
Co	21	24"	CERCIS OCCIDENTALIS	WESTERN REDBUD	(Co)	MULTI-TRUNK	LOW		Y			
Pd	4	36"	PARKINSONIA X 'DESERT MUSEUM'	DESERT MUSEUM PALO VERDE	(Pd)	MULTI-TRUNK	VERY LOW		N			
Pr	18	36"	PLATANUS RACEMOSA	CALIFORNIA SYCAMORE	(Pr)	STANDARD	MEDIUM		Y			
Co	12	36"	QUERCUS AGRIFOLIA	COAST LIVE OAK	(Co)	STANDARD	VERY LOW		Y			
Ql	7	36"	QUERCUS LOBATA	VALLEY OAK	(Ql)	STANDARD	MEDIUM		Y			
U	13	36"	ULMUS PARVIFOLIA	CHINESE ELM	(U)	STANDARD	VERY LOW		N			
Ug	6	48"	ULMUS PARVIFOLIA 'TRUE GREEN'	'TRUE GREEN' CHINESE ELM	(Ug)	STANDARD	MEDIUM		N			
At	45	5 GAL	ASCLEPIAS FASCICULARIS	NARROW-LEAF MILKWEED	(At)		VERY LOW		Y			
As	7	5 GAL	AGAVE DESMETIANA 'VAREGATA'	VAREGATED SMOOTH AGAVE	(As)		LOW		N			
B	26	5 GAL	ALOE BUSSEI	-	(B)		LOW		N			
Bl	51	5 G.C.	BOUGAINVILLEA 'LA JOLLA'	LA JOLLA BOUGAINVILLEA	(Bl)		LOW		N			
Op	12	5 G.C.	CAESALPINIA PULCHERRIMA	RED BIRD OF PARADISE	(Op)		LOW		N			
Co	62	5 GAL	CALLIANDRA ERIOPHYLLA	PINK FAIRYDUSTER	(Co)		VERY LOW		Y			
Cc	68	5 GAL	CARPENTERIA CALIFORNICA	BUSH ANEMONE	(Cc)		LOW		Y			
Cr	20	5 G.C.	DISTIS PURPUREUS	ORCHID ROCK ROSE	(Cr)		LOW		N			

PLANTING SCHEDULE										USDA ZONE : 9, SUNSET ZONE:22		
SYMBOL	QTY.	SIZE	BOTANICAL NAME	COMMON NAME	DETAIL	REMARKS/ALTERNATES	WUCOLS	SPACING	CALIFORNIA NATIVE			
Dw	10	5 GAL	DASYLIRON WHEELERI	SPOON YUCCA	(Dw)		VERY LOW		N			
Gg	21	5 GAL	CEANOTHUS LEUCODERMIS	WHITE BARK CALIFORNIA LILAC	(Gg)		LOW		Y			
Th	10	5 GAL	EUPHORBIA MILI	CROWN OF THORNS	(Th)		LOW		N			
Fb	12	5 GAL	FEROCACTUS	BARREL CACTUS	(Fb)		VERY LOW		Y			
Ha	39	15 GAL	HETEROMELES ARBUTIFOLIA	TOYON	(Ha)		VERY LOW		Y			
Is	39	5 GAL	ISOMERIS ARBOREA	BLADDERPOD	(Is)		VERY LOW		Y			
Kl	29	5 GAL	KALANCHOE LUCIAE	PADDLE PLANT	(Kl)		LOW		N			
Lh	74	5 G.C.	LANTANA CAMARA 'GOLD MOUND'	GOLD MOUND LANTANA	(Lh)		LOW		N			
Pc	118	5 GAL	PENSTEMON SPECTABILIS	SHOWY PENSTEMON	(Pc)		LOW		Y			
Rc	25	5 GAL	ROMNEYA COULTERI	MATILJA POPPY	(Rc)		VERY LOW		Y			
Ri	49	15 GAL	RHUS INTEGRIFOLIA	LEMONADE BERRY	(Ri)		VERY LOW		Y			
Sp	201	5 GAL	SALVA PACHYPHYLLA	BLUE SAGE	(Sp)		LOW		Y			
St	49	5 GAL	SALVA SPATHACEA	HUMMINGBIRD SAGE	(St)		LOW		Y			
Tl	134	5 GAL	TRICHOSTEMA LANATUM	WOOLLY BLUE CURLS	(Tl)		VERY LOW		Y			

GROUND COVER AND VINES												
SYMBOL	QTY.	SIZE	BOTANICAL NAME	COMMON NAME	DETAIL	REMARKS/ALTERNATES	WUCOLS	SPACING	CALIFORNIA NATIVE			
(Symbol)	2570	SF	FLAT	BACCHARIS PILLULARIS	COYOTE BUSH	(Symbol)	LOW		Y			
(Symbol)	2850	SF	FLAT	CEANOTHUS 'YANKEE POINT'	CALIFORNIA LILAC	(Symbol)	LOW		Y			
(Symbol)	1360	SF	FLAT	ERIGERON KARVINSKIANUS	SANTA BARBARA DAISY	(Symbol)	LOW		N			
(Symbol)	7520	SF	-	HYDROSEED	CALIFORNIA NATIVES	(Symbol)	-		-			
(Symbol)	3500	SF	FLAT	MYOPORUM PARVIFOLIUM 'PINK'	CREeping BOOIBALLA	(Symbol)	LOW		N			
(Symbol)	1280	SF	FLAT	SALVA 'BEE'S BLISS'	CREeping SAGE	(Symbol)	LOW		Y			
(Symbol)	720	SF	FLAT	SENECIO MANDRALISCAE	KLEINIA	(Symbol)	LOW		N			
(Symbol)	2600	SF	FLAT	SYMPHORICARPOS MOLLIS	CREeping SNOWBERRY	(Symbol)	LOW		Y			
(Symbol)	1960	SF	SOD	SYNTHETIC TURF	FOREVER LAMN MFTS: K9 GRASS	(Symbol)						
(Symbol)	3611	SF	-	DRY CREEK BED	SEE SHEET LP1.1 FOR MATERIALS DETAILS	(Symbol)						
(Symbol)	8831	SF	-	EXISTING TO REMAIN		(Symbol)						
(Symbol)	4	-	-	DISTICTIS BUCCINATORIA	BLOOD RED TRUMPET VINE	(Symbol)	MEDIUM	10' O.C.	N			

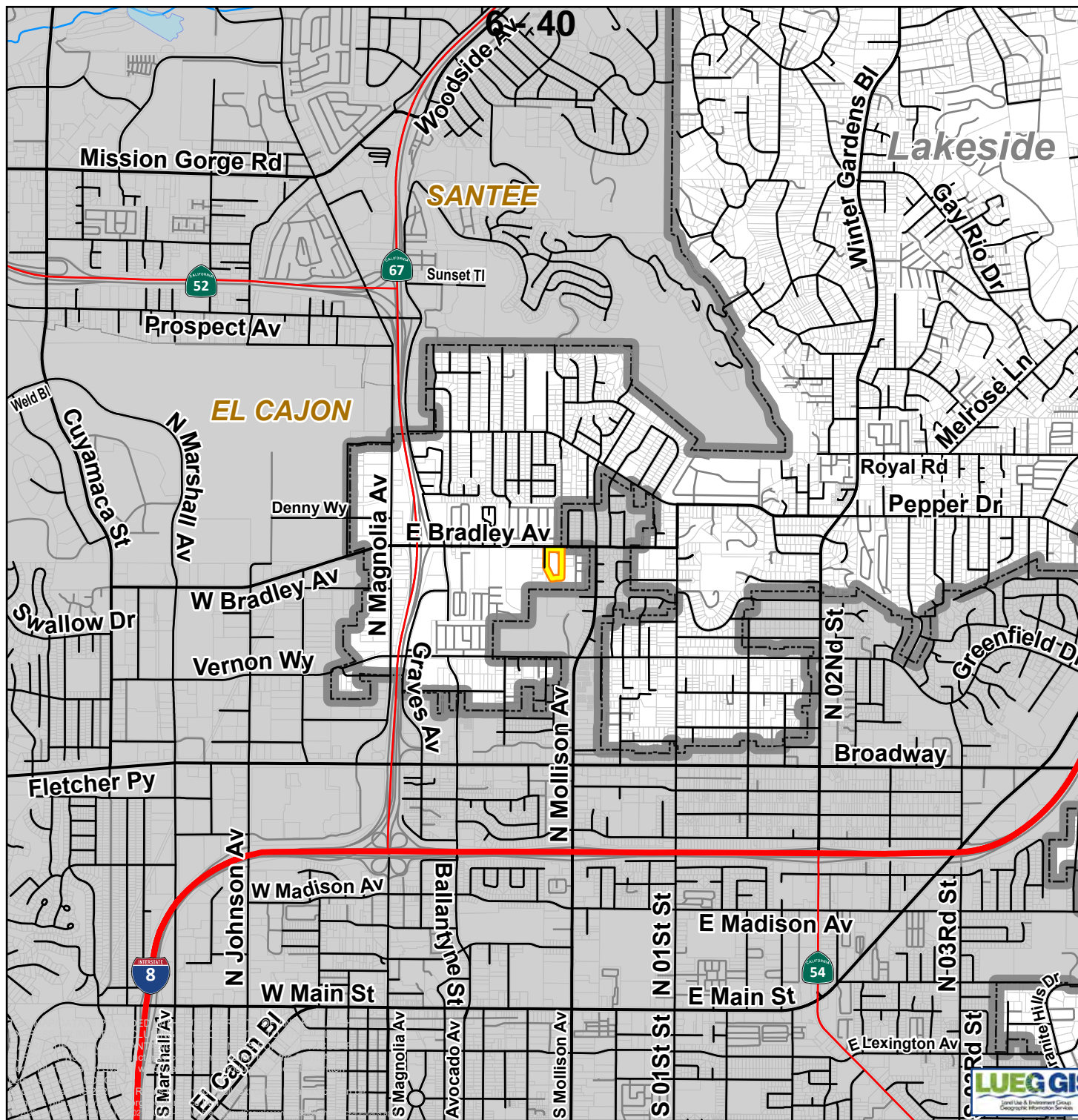
2 PLANT SCHEDULE

SDC PDS RCVD 09-24-24
MUP85-053W2



Date: 08.21.2022
Scale: AS SHOWN

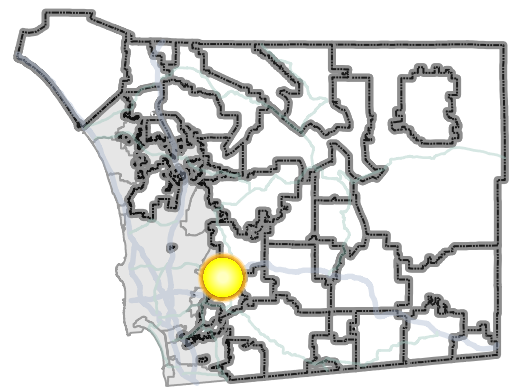
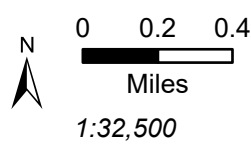
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Sheet Number
LP1.0

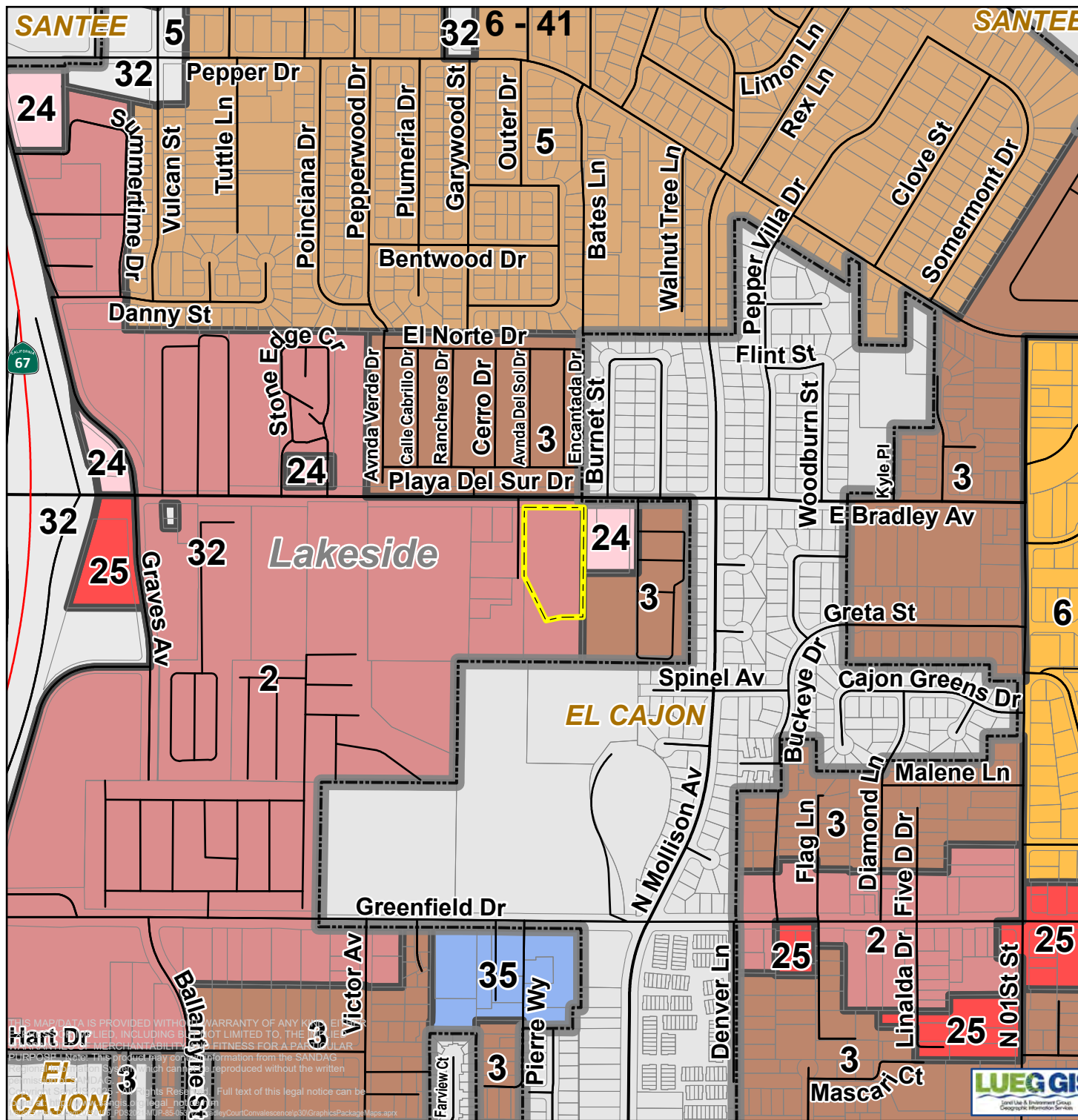


Bradley Court
 Convalescence
 PDS2021-MUP-85-053W2

Vicinity
 Lakeside
 Community Plan Area

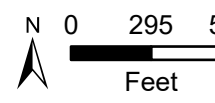
- Roads
- Site
- Parcels
- Incorporated
- CPA





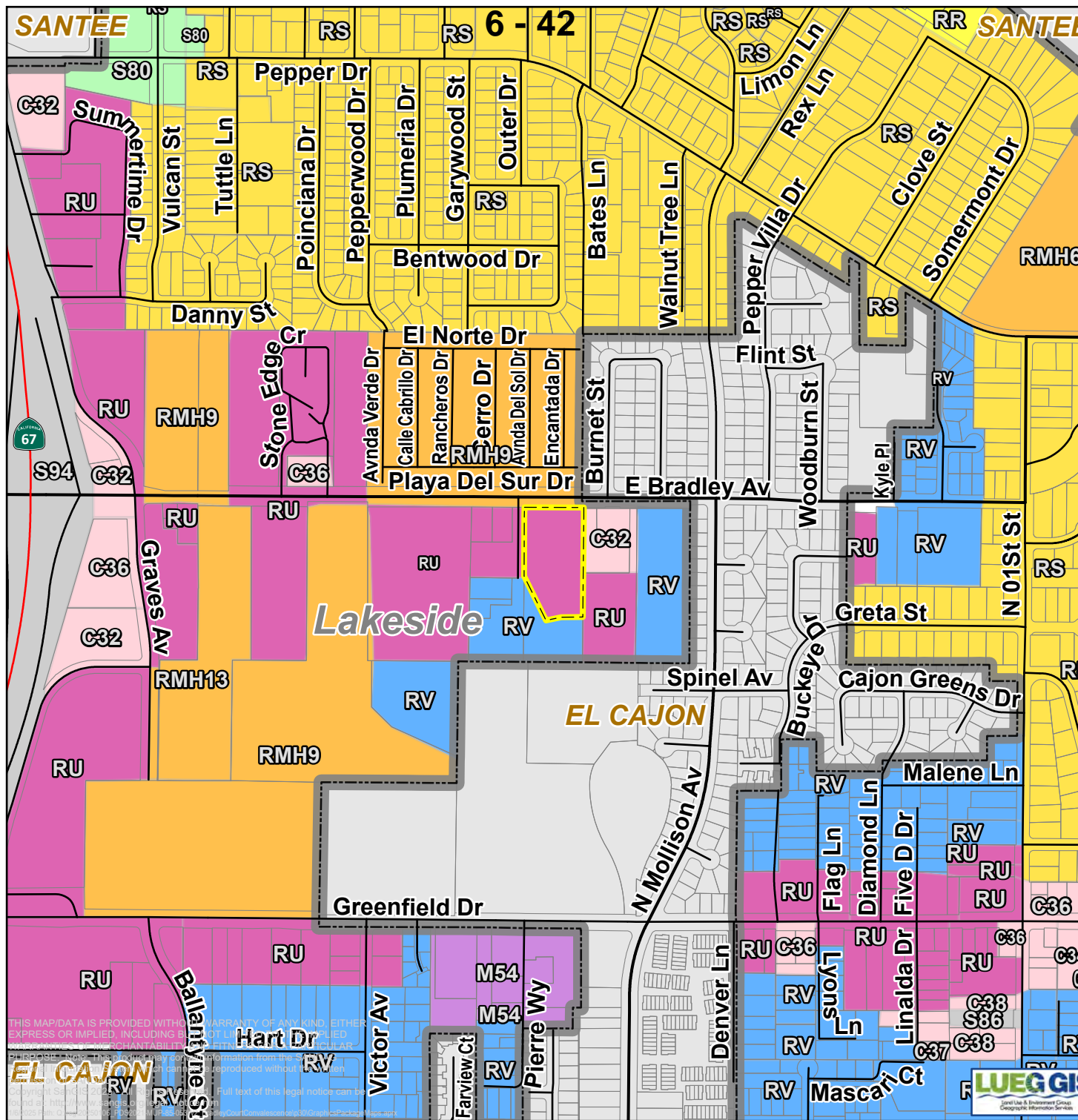
Bradley Court
 Convalescence
 PDS2021-MUP-85-053W2
General Plan
 Lakeside
 Community Plan Area

- | | | | | | | | | | | | | | |
|-------|------|---------|--------------|-----|---------------------|---------------------------------|---------------------------------|----------------------------------|----------------------------------|------------------------------|-------------------------|------------------------------------|-------------------------------|
| Roads | Site | Parcels | Incorporated | CPA | General Plan | (2) Village Residential (VR-24) | (3) Village Residential (VR-15) | (5) Village Residential (VR-7.3) | (6) Village Residential (VR-4.3) | (24) Neighborhood Commercial | (25) General Commercial | (32) Public/Semi-Public Facilities | (35) Medium Impact Industrial |
|-------|------|---------|--------------|-----|---------------------|---------------------------------|---------------------------------|----------------------------------|----------------------------------|------------------------------|-------------------------|------------------------------------|-------------------------------|

















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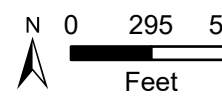




Bradley Court
 Convalescence
 PDS2021-MUP-85-053W2

Zoning
 Lakeside
 Community Plan Area

-  Roads
-  Site
-  Parcels
-  Incorporated
-  CPA
- Zoning**
-  (C##) Commercial and Office
-  (M##) Industrial
-  (S80) Open Space
-  (RS) Residential - Single
-  (RU) Residential - Urban
-  (RMH) Residential Mobile Home
-  (RV) Residential - Variable
-  (RR) Rural Residential
-  (S##) Transportation and Utility



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**Attachment B – Form of Decision Approving
PDS2021-MUP-85-053W2**



County of San Diego
PLANNING & DEVELOPMENT SERVICES

VINCE NICOLETTI
Director

5510 OVERLAND AVENUE, SUITE 110, SAN DIEGO, CALIFORNIA 92123
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017
www.sdcounty.ca.gov/pds

COMMISSIONERS

Douglas Barnhart
Ronald Ashman (Chair)
Michael Edwards (Vice-Chair)
Molly Weber
Yolanda Calvo
David Pallinger

February 28, 2025

PERMITEE: THOMAS JURBALA
MAJOR USE PERMIT: PDS2021-MUP-053W2
E.R. NUMBER: PDS2021-ER-21-14-004
PROPERTY: 675 E. BRADLEY AVE IN EL CAJON, CA 92021
APN(S): 387-142-36-00

DECISION OF THE PLANNING COMMISSION

This Major Use Permit Modification is for the expansion of an existing convalescent center project. This permit authorizes the construction of a new adult residential facility, and a new skilled nursing facility per plot plan. This Major Use Permit Modification consists of plot plans, architectural plans, elevations, and a conceptual landscape plan. This permit authorizes the proposed uses in accordance with sections 1350, 2140, 5250, and 7358 of the Zoning Ordinance.

The granting of this use permit also approves the Preliminary Grading Plan. In accordance with the Section 87.207 of the County Grading Ordinance, Environmental Mitigation Measures or other conditions of approval required and identified on the plan(s), shall be completed or implemented on the final engineering plan before any final improvement or grading plan can be approved and any permit issued in reliance of the approved plan. Any Substantial deviation therefrom the Preliminary Grading and Improvement Plan may cause the need for further environmental review. Additionally, approval of the preliminary plan does not constitute approval of a final engineering plan. A final engineering plan shall be approved pursuant to County of San Diego Grading Ordinance (Sec 87.701 et. al.)

MAJOR USE PERMIT EXPIRATION: This Major Use Permit shall expire on **February 28, 2027** at 4:00 p.m. (or such longer period as may be approved pursuant to Section 7376 of The Zoning Ordinance of the County of San Diego prior to said expiration date) unless construction or use in reliance on this Major Use Permit has commenced prior to said expiration.

.....
WAIVER(S) AND EXCEPTION(S): This Use Permit is hereby approved pursuant to the provisions of the San Diego County Zoning Ordinance, the County Public Road Standards and

Private Road Standards, and all other required ordinances of the County of San Diego. The sole exceptions to the aforementioned are:

Allow a reduction in the required minimum separation distance between intersecting centerlines of a Non-Mobility Element Road (including driveways) entering a Mobility Element Road to 156 feet and 217 feet at the proposed project driveway, respectively, instead of the required 300 feet per County Road Standards Section 6.1.C.2 for the existing driveways entering into Bradley Avenue (Mobility Element Road) pursuant to the Design Exception Request that was approved on May 23, 2024.

SPECIFIC CONDITIONS: Compliance with the following Specific Conditions (Mitigation Measures when applicable) shall be established before the property can be used in reliance upon this Permit. Where specifically indicated, actions are required prior to approval of any grading, improvement, and/or building plan, and issuance of grading, construction, building, and/or other permits as specified:

ANY PERMIT: *(Prior to the approval of any plan, issuance of any permit, and prior to occupancy or use of the premises in reliance of this permit).*

1. GEN#1–COST RECOVERY

INTENT: In order to comply with Section 362 of Article XX of the San Diego County Administrative Code, Schedule B.5, existing deficit accounts associated with processing this permit shall be paid. **DESCRIPTION OF REQUIREMENT:** The applicant shall pay off all existing deficit accounts associated with processing this permit. **DOCUMENTATION:** The applicant shall provide evidence to Planning & Development Services, Zoning Counter, which shows that all fees and trust account deficits have been paid. No permit can be issued if there are deficit trust accounts. **TIMING:** Prior to the approval of any plan and prior to the issuance of any permit and prior to use in reliance of this permit, all fees and trust account deficits shall be paid. **MONITORING:** The PDS Zoning Counter shall verify that all fees and trust account deficits have been paid.

2. GEN#2–RECORDATION OF DECISION

INTENT: In order to comply with Section 7019 of the Zoning Ordinance, the Permit Decision shall be recorded to provide constructive notice to all purchasers, transferees, or other successors to the interests of the owners named, of the rights and obligations created by this permit. **DESCRIPTION OF REQUIREMENT:** The applicant shall sign, notarize with an all-purpose acknowledgement' and return the original recordation form to PDS. **DOCUMENTATION:** Signed and notarized

original recordation form. **TIMING:** Prior to the approval of any plan and prior to the issuance of any permit and prior to use in reliance of this permit, a signed and notarized copy of the Decision shall be recorded by PDS at the County Recorder's Office. **MONITORING:** The PDS Zoning Counter shall verify that the Decision was recorded and that a copy of the recorded document is on file at PDS.

3. GEN#3–GROUP CARE FACILITY STATE LICENSING

INTENT: In order to comply with Section 1345 of the Zoning Ordinance regarding operations of a Group Care Facility and any applicable State License, a State License for the operating of the facility shall be acquired. **DESCRIPTION OF REQUIREMENT:** The applicant shall obtain a State License from the applicable state agency for operations for facility for operations of the facility. The three skilled nursing buildings will be licensed through the State of California Department of Public Health and the skilled transitional care facility will be through the Department of Healthcare Services. **DOCUMENTATION:** The applicant shall submit the applicable State Licensing documentation. **TIMING:** Prior to the approval of any plan and prior to the issuance of any permit, the applicable State Licensing documentation must be provided. **This condition can be deferred to prior to building permit or prior to final occupancy depending on the timing needed by the applicable State License application.** **MONITORING:** The [PDS, LDDR] and Zoning Counter shall review the submitted documentation for consistency with this condition.

4. LNDSCP#1–LANDSCAPE DOCUMENTATION PACKAGE

INTENT: In order to provide adequate Landscaping that addresses screening, and to comply with the Lakeside Design Guidelines, a landscape plan shall be prepared. **DESCRIPTION OF REQUIREMENT:** The Landscape Plans shall be prepared pursuant to the COSD Water Efficient Landscape Design Manual and the COSD Water Conservation in Landscaping Ordinance, the COSD Parking Design Manual, the COSD Grading Ordinance, and the Lakeside Design Guidelines. All Plans shall be prepared by a California licensed Landscape Architect, Architect, or Civil Engineer, and include the following information:

- a. Indication of the proposed width of any adjacent public right-of-way, and the locations of any required improvements and any proposed plant materials to be installed or planted therein. The applicant shall also obtain a permit approving the variety, location, and spacing of all trees proposed to be planted within said right(s)-of-way. A copy of this permit and a letter stating that all landscaping within the said right(s) -of-way shall be maintained by the landowner(s) shall be submitted to PDS.
- b. A complete planting plan including the names, sizes, and locations of all plant materials, including trees, shrubs, and groundcover. Wherever appropriate, native or naturalizing plant materials shall be used which can thrive on natural moisture. These plants shall be irrigated only to establish the plantings.

- c. A complete watering system including the location, size, and type of all backflow prevention devices, pressure, and non-pressure water lines, valves, and sprinkler heads in those areas requiring a permanent, and/or temporary irrigation system.
- d. The watering system configuration shall indicate how water flow, including irrigation runoff, low head drainage, overspray or other similar conditions will not impact adjacent property, non-irrigated areas, structures, walkways, roadways or other paved areas, including trails and pathways by causing water to flow across, or onto these areas.
- e. Spot elevations of the hardscape, building and proposed fine grading of the installed landscape.
- f. The location and detail of all walls, fences, and walkways shall be shown on the plans, including height from grade and type of material. A lighting plan and light standard details shall be included in the plans (if applicable) and shall be in compliance with the County's Light Pollution Code.
- g. No landscaping material or irrigation or other infrastructure shall be located within a proposed trail easement or designated pathway.
- h. Parking areas shall be landscaped and designed pursuant to the Parking Design Manual and the County Zoning Ordinance Section 6793.b.
- h. Additionally, the following items shall be addressed as part of the Landscape Documentation Package:
 - Proof of SDG&E's approval of all trees proposed to be located within their easements on the property shall be provided prior to final approval of this Condition.
 - All storm water basins shall be coordinated with the projects' grading plans to ensure both plans match in layout and configuration, including specifications and soil mixes.
 - All parking stalls adjacent to a planter or pedestrian walkway less than 7' in width shall be equipped with a wheel stop per the requirements of the Parking Design Manual.
 - All parking stalls shall be within 30' of the trunk of a tree per the requirements of the Parking Design Manual. Raised half-diamond planters shall be considered in areas where trees cannot be located in adjacent planting areas.

DOCUMENTATION: The applicant shall prepare the Landscape Plans using the [Landscape Documentation Package Checklist](#) (PDS Form #404), and pay all applicable review fees. **TIMING:** Prior to approval of any plan, issuance of any permit, and prior to use of the premises in reliance of this permit, the Landscape Documentation Package shall be prepared and approved. **MONITORING:** The [PDS, LA] and [DPR, TC, PP] shall review the Landscape Documentation Package for compliance with this condition.

5. ROADS#1–SIGHT DISTANCE

INTENT: In order to provide an unobstructed view for safety while exiting the property and accessing a public road from the site, and to comply with the Design Standards of Section 6.1.(E) of the [County of San Diego Public Road Standards](#), an unobstructed sight distance shall be verified. **DESCRIPTION OF REQUIREMENT:**

- a. A registered civil engineer or a licensed land surveyor provides a certified signed statement that: “There is **560’ of unobstructed intersectional sight distance in both directions** from the proposed private driveway along **East Bradley Avenue** in accordance with the methodology described in Table 5 of the March 2012 County of San Diego Public Road Standards. These sight distances exceed the required intersectional Sight Distance requirements of **550 Feet** as described in Table 5 based on a speed of **55 MPH**, which I have verified to be the *higher* of the prevailing speed or the minimum design speed of the road classification. I have exercised responsible charge for the certification as defined in Section 6703 of the Professional Engineers Act of the California Business and Professions Code.”
- b. If the lines of sight fall within the existing public road right-of-way, the engineer or surveyor shall further certify: "Said lines of sight fall within the existing right-of-way and a clear space easement is not required."

DOCUMENTATION: The applicant shall complete the certifications and submit them to the [PDS, LDR] for review. **TIMING:** Prior to the approval of any plan, issuance of any permit, and prior to occupancy or use of the premises in reliance of this permit, the sight distance shall be verified. **MONITORING:** The [PDS, LDR] shall verify the sight distance certifications.

6. STRMWTR#1–STORMWATER MAINTENANCE DOCUMENTATION

INTENT: In order to promote orderly development and to comply with the County Watershed Protection Ordinance (WPO) No.10410 (County Code Section 67.801 et. seq.), the maintenance agreements shall be completed. **DESCRIPTION OF REQUIREMENT:**

- a. Process a Stormwater Facilities Maintenance Agreement (SWMA) to assure maintenance of the Category 2 Structural BMPs and provide security to back

up the maintenance pursuant to the County Maintenance Plan Guidelines to the satisfaction of the Director of DPW and/or PDS. The SWMA shall be signed and notarized by the applicant and recorded by the County.

DOCUMENTATION: The applicant shall process the agreement forms with [PDS, LDR] and pay any deposit and applicable review fees. **TIMING:** Prior to approval of any grading or improvement plan or construction permit, prior to use of the property in reliance of this permit; execution of the recorded agreements and securities shall be completed. **MONITORING:** The [PDS, LDR] shall review the agreements/mechanisms for consistency with the condition and County Standards.

7. **STRMWTR#2 –EROSION CONTROL**

INTENT: In order to Comply with all applicable stormwater regulations, the activities proposed under this application are subject to enforcement under permits from the State Construction General Permit, Order No. 2022-0057-DWQ, or subsequent order and the County Watershed Protection Ordinance (WPO) No.10410, County Code Section 67.801 et. seq., and all other applicable ordinances and standards for this priority project. **DESCRIPTION OF REQUIREMENT:** The applicant shall maintain the appropriate on-site and offsite Best Management Practices pursuant to the approved Stormwater Quality Management Plan (SWQMP) and Erosion Control Plan including, but not limited to the erosion control measures, irrigation systems, slope protection, drainage systems, desilting basins, energy dissipators, and silt control measure.

- a. An agreement and instrument of credit shall be provided for an amount equal to the cost of this work as determined or approved by the [PDS, LDR], in accordance with the County of San Diego Grading Ordinance Section 87.304. The cash deposit collected for grading, per the grading ordinance, will be used for emergency erosion measures. The developer shall submit a letter to [PDS, LDR] authorizing the use of this deposit for emergency measures.
- b. An agreement in a form satisfactory to County Counsel shall accompany the Instrument of Credit to authorize the County to unilaterally withdraw any part of or all the Instrument of Credit to accomplish any of the work agreed to if it is not accomplished to the satisfaction of the County PDS and/or DPW by the date agreed.

DOCUMENTATION: The applicant shall process an Erosion Control Plan and provide the letter of agreement and any additional security and/or cash deposit to the [PDS, LDR]. **TIMING:** Prior to approval of any grading or improvement plan or construction permit, and prior to use of the property in reliance of this permit, the Erosion Control Plan shall be approved, and the agreement and securities shall be executed. **MONITORING:** The [PDS, LDR] shall ensure that the Erosion Control Plan adequately satisfies the requirements of the conditions to potentially perform the required erosion control and stormwater control measures proposed on all

construction and grading plans. [DPW, PDCI] shall use the securities pursuant to the agreement to implement and enforce the required stormwater and erosion control measures pursuant to this condition during all construction phases as long as there are open and valid permits for the site.

GRADING PERMIT: *(Prior to approval of any grading and/or improvement plans and issuance of any Grading or Construction Permits).*

8. EASEMENTS#1–EASEMENT CONCURRENCE LETTERS

INTENT: In order to ensure work is constructed within easements through authorization of the public entity or grantee of the easement. **DESCRIPTION OF REQUIREMENT:** A letter of authorization or documentation shall be provided demonstrating that work or construction can occur within applicable easements on the subject property. **DOCUMENTATION:** The applicant shall provide letters of authorization from a grantee of an easement or documentation demonstrating that work or construction can occur within applicable easements on the subject property. The applicant shall submit the documentation to the [PDS, LDR] for review and approval. **TIMING:** Prior to the approval of the improvement plans or grading plan, the documentation shall be submitted. **MONITORING:** The [PDS, LDR] shall review the documentation.

9. CULT#1 - ARCHAEOLOGICAL AND TRIBAL MONITORING

INTENT: In order to mitigate for potential impacts to undiscovered buried archaeological resources and human remains, an Archaeological and Tribal Monitoring Program and potential Data Recovery Program shall be implemented pursuant to the County of San Diego Guidelines for Determining Significance for Cultural Resources and the California Environmental Quality Act (CEQA). **DESCRIPTION OF REQUIREMENT:** A County Approved Principal Investigator (PI) known as the “Project Archaeologist,” shall be contracted to perform archaeological monitoring and a potential data recovery program during all grading, clearing, grubbing, trenching, and construction activities. The archaeological monitoring program shall include the following:

- a. The Project Archaeologist shall perform the monitoring duties before, during and after construction pursuant to the most current version of the County of San Diego Guidelines for Determining Significance and Report Format and Requirements for Cultural Resources. The Project Archaeologist and Kumeyaay Native American monitor shall also evaluate fill soils to determine that they are clean of cultural resources. The contract or letter of acceptance provided to the County shall include an agreement that the archaeological monitoring will be completed, and a Memorandum of Understanding (MOU) between the Project Archaeologist and the County of San Diego shall be executed. The contract or letter of acceptance shall include a cost estimate for the monitoring work and reporting.

- b. The Project Archeologist shall provide evidence that a Kumeyaay Native American has been contracted to perform Native American Monitoring for the project.
- c. The cost of the monitoring shall be added to the grading bonds or bonded separately.

DOCUMENTATION: The applicant shall provide a copy of the Archaeological Monitoring Contract or letter of acceptance, cost estimate, and MOU to [PDS, PPD]. Additionally, the cost amount of the monitoring work shall be added to the grading bond cost estimate. **TIMING:** Prior to approval of any grading and or improvement plans and issuance of any Grading or Construction Permits. **MONITORING:** [PDS, PPD] shall review the contract or letter of acceptance, MOU and cost estimate or separate bonds for compliance with this condition. The cost estimate should be forwarded to [PDS, PPD] for inclusion in the grading bond cost estimate, and grading bonds and the grading monitoring requirement shall be made a condition of the issuance of the grading or construction permit.

10. **CULT#2 - CULTURAL RESOURCES TREATMENT AGREEMENT AND PRESERVATION PLAN**

INTENT: In order to mitigate for impacts to Traditional Cultural Properties, develop and enter into a Cultural Resources Treatment Agreement and Preservation Plan with a consulting tribe. **DESCRIPTION OF REQUIREMENT:** A Cultural Resources Treatment Agreement and Preservation Plan shall be developed between the applicant or their representative, the County of San Diego, and the consulting tribe. The Cultural Resources Treatment Agreement and Preservation Plan shall be reviewed and agreed to by the County prior to final signature and authorization. The Cultural Resources Treatment Agreement and Preservation Plan shall include but is not limited to the following:

- a. Parties entering into the agreement and contact information.
- b. Responsibilities of the Property Owner or their representative, Principal Investigator, archaeological monitors, Kumeyaay Native American monitors, County, and consulting tribes (Barona, Campo, San Pasqual, and Viejas).
- c. Requirements of the Archaeological Monitoring Program including unanticipated discoveries. The requirements shall address grading and grubbing requirements including controlled grading and controlled vegetation removal in areas of cultural sensitivity, analysis of identified cultural materials, and onsite storage of cultural materials.
- d. Excavated soils. No soils are proposed for export. Consultation with the culturally-affiliated tribes shall occur should excavated soils need to be exported offsite.

- e. Treatment of identified Native American cultural materials.
- f. Treatment of Native American human remains and associated grave goods.
- g. Confidentiality of cultural information including location and data.
- h. Regulations that apply to cultural resources that have been identified or may be identified during project construction.

DOCUMENTATION: A copy of the implemented agreement shall be submitted to the [PDS, PPD] for approval. **TIMING:** Prior to approval of any grading and or improvement plans and issuance of any Grading or Construction Permits. **MONITORING:** The [PDS, PPD] shall review the implemented agreement for compliance this condition.

BUILDING PERMIT: (Prior to approval of any building plan and the issuance of any building permit).

11. GEN#4–INSPECTION FEE

INTENT: In order to comply with Zoning Ordinance Section 7362.e the inspection fee shall be paid. **DESCRIPTION OF REQUIREMENT:** Pay the inspection fee at the [PDS, ZC] to cover the cost of inspection(s) of the property to monitor ongoing conditions associated with this permit. In addition, submit a letter indicating who should be contacted to schedule the inspection. **DOCUMENTATION:** The applicant shall provide a receipt showing that the inspection fee has been paid along with updated contact information [PDS, PCC]. **TIMING:** Prior to any approval of any building plan, issuance of any building permit, and/or final sign off associated with the structures referenced above, compliance with this condition is required. **MONITORING:** The [PDS, ZC] shall process an invoice and collect the fee. PDS will schedule an inspection within one year from the date that occupancy or use of the site was established.

12. PLN#1–SITE PLAN IMPLEMENTATION

INTENT: In order to comply with the approved project design indicated on the approved plot plan, the project shall be constructed as indicated on the approved building and construction plans. **DESCRIPTION OF REQUIREMENT:** The site shall conform to the approved Site Plan plot plan and the building plans. This includes, but is not limited to: installing all required design features, installing parking as shown, painting all equipment with the approved colors, required and approved signage is installed and located properly, and all temporary construction facilities have been removed from the site. **DOCUMENTATION:** The applicant shall ensure that the site conforms to the approved plot plan and building plans. **TIMING:** Prior to approval of any building plan, issuance of any building permit, and/or final sign off associated with the structures referenced above, compliance with this condition is required. **MONITORING:** The [PDS, BI] and [DPR TC, PP] shall inspect the site for compliance with the approved Building Plans.

13. FIRE#1- FIRE DISTRICT REVIEW

INTENT: In order to comply with the approved project design indicated on the approved plot plan, the project shall be reviewed and approved by the San Miguel Fire Protection District. **DESCRIPTION OF REQUIREMENT:** The applicant will ensure that the San Miguel Fire Protection District reviews the project prior to building permit. **DOCUMENTATION:** The [PDS, LDR] shall review the plans for consistency with the condition. **TIMING:** Prior to building permit issuance, or use in the premises in reliance of this permit, the SMFPD must provide a review and approval. **MONITORING:** The [PDS, LDR] and [DPR, TC] shall review the plans for consistency with the condition.

14. GHG#1–SUSTAINABLE DESIGN FEATURES

INTENT: In order to promote project sustainability. **DESCRIPTION OF REQUIREMENT:** The project shall install the following sustainable design features or comply with relevant regulations:

- a. Install low-flow plumbing fixtures in compliance with CALGreen, which requires a 20 percent increase in indoor water use efficiency and use of indoor water-efficient irrigation systems.
- b. Install a high-reflectivity cool roof.
- c. Utilize architectural coatings compliant with SDAPCD Rule 67.
- d. Provide Electric Vehicle (EV) spaces as shown on the Plot Plan.
- e. Install high-efficiency LED lighting to achieve reduction in overall lighting energy.
- f. Incorporate photovoltaic (PV) provisions consistent with the requirements for residential land uses.

DOCUMENTATION: The applicant shall comply with the requirements of this condition. **TIMING:** Prior to approval of any building plan or the issuance of any building permit, these design measures shall be implemented on the building plans and landscape plans. **MONITORING:** The [PDS, BPPR] shall verify that the building plans comply with the conditions.

15. NOISE#1–NOISE REQUIREMENT

INTENT: In order to reduce the exposure to noise levels in excess of standards established by the County of San Diego General Plan Noise Element (Table N-1 & N-2), and to mitigate the noise exposure of exterior noise sensitive land uses below levels of significance as evaluated in the County Noise Guidelines for Determining Significance, the following design measures shall be implemented on the building plans and incorporated into the site design. **DESCRIPTION OF**

REQUIREMENT: The following design elements and noise attenuation measures shall be implemented and indicated on the building plans and made conditions of its issuance:

- a. The project shall include an 8-foot-high enclosure around the replacement backup emergency generator as shown on the plot plan.

DOCUMENTATION: The applicant shall place the design elements, or notes on the building plans and submit the plans to [PDS, BPPR] for review and approval.

TIMING: Prior to issuance of any building permit, the design elements and noise attenuation measures shall be incorporated into the building plans.

MONITORING: The [PDS, BPPR] shall verify that the specific note(s), and design elements, and noise attenuation measures have been placed on all sets of the building plans and made conditions of its issuance.

16. BLD#1–LIGHTING COMPLIANCE

INTENT: In order to ensure that all lighting proposed for the project conforms with the Lighting Ordinance, the following notes and condition shall apply.

DESCRIPTION OF REQUIREMENT: The Building Division [PDS, BPPR] shall review that all lighting indicated on the plans comply with Section 59.101 et. Seq. of the San Diego County Code, Section 6322 et. Seq. of the San Diego County Zoning Ordinance, and all outdoor lighting will conform to Title 24 or other applicable requirements, be fully shielded, and downward facing.

DOCUMENTATION: The applicant shall place the design elements, or notes on the building plans and the [PDS, BPPR] shall review the lighting and notes for compliance. **TIMING:** Prior to issuance of any building permit, the lighting design shall be incorporated into the building plans. **MONITORING:** The [PDS, BPPR] shall review all proposed lighting and notes for compliance with the applicable lighting code and requirements.

17. PLN#1–OVERFLIGHT AGREEMENT

INTENT: In order to comply with the Gillespie [Airport Land Use Compatibility Plan](#) an OVERFLIGHT AGREEMENT shall be recorded.

DESCRIPTION OF REQUIREMENT: Grant by separate document to the Gillespie Airfield, an overflight agreement over the entire property as shown on the approved Plot Plan.

DOCUMENTATION: The applicant shall sign an overflight agreement and record it at the County Recorder's Office. **TIMING:** Prior to approval of any plan or issuance of any permit, and prior to use of the premises in reliance of this permit, the agreement shall be recorded. **MONITORING:** The applicant shall prepare the documents and forward a copy of the documents to [PDS] for preapproval. The applicant shall forward copies of the recorded documents to [PDS]. [PDS] shall review the documents for compliance with this condition.

OCCUPANCY: (Prior to any occupancy, final grading release, or use of the premises in reliance of this permit).

18. PLN#2–SITE PLAN IMPLEMENTATION

INTENT: In order to comply with the approved project design indicated on the approved plot plan, the project shall be constructed as indicated on the approved building and construction plans. **DESCRIPTION OF REQUIREMENT:** The site shall conform to the approved plot plan and the building plans. This includes, but is not limited to: installing all required design features, and all temporary construction facilities have been removed from the site. **DOCUMENTATION:** The applicant shall ensure that the site conforms to the approved plot plan and building plans. **TIMING:** Prior to any occupancy, final grading release, or use of the premises in reliance of this permit, the site shall conform to the approved plans. **MONITORING:** The [PDS, BI] and [DPR TC, PP] shall inspect the site for compliance with the approved Building Plans.

19. LNDSKP#2–CERTIFICATION OF INSTALLATION

INTENT: In order to provide adequate Landscaping that addresses screening, and to comply with the COSD Water Efficient Landscape Design Manual, the COSD Water Conservation in Landscaping Ordinance, the COSD Parking Design Manual, the COSD Grading ordinance, and the Lakeside Design Guidelines, all landscaping shall be installed. **DESCRIPTION OF REQUIREMENT:** All of the landscaping shall be installed pursuant to the approved Landscape Documentation Package. This does not supersede any erosion control plantings that may be applied pursuant to Section 87.417 and 87.418 of the County Grading Ordinance. These areas may be overlapping, but any requirements of a grading plan shall be complied with separately. The installation of the landscaping can be phased pursuant to construction of specific buildings or phases to the satisfaction of the [PDS, LA, PCC] [DPR, TC, PP]. **DOCUMENTATION:** The applicant shall submit to the [PDS LA, PCC], a Landscape Certificate of Completion from the project California licensed Landscape Architect, Architect, or Civil Engineer, that all landscaping has been installed as shown on the approved Landscape Documentation Package. The applicant shall prepare the Landscape Certificate of Completion using the Landscape Certificate of Completion Checklist, PDS Form #406. **TIMING:** Prior to any occupancy, final grading release, or use of the premises in reliance of this permit, the landscaping shall be installed. **MONITORING:** The [PDS, LA] shall verify the landscape installation upon notification of occupancy or use of the property, and notify the [PDS, PCC] [DPR, TC, PP] of compliance with the approved Landscape Documentation Package.

20. ROADS#2–PUBLIC ROAD IMPROVEMENTS

INTENT: In order to promote orderly development and to comply with County of San Diego Board Policy I-18 and the County Consolidated Fire Code Sec. 503 et al., project access and **East Bradley Avenue** shall be improved. **DESCRIPTION OF REQUIREMENT:** Improve the following:

- a. The project driveway, which shall be designed and constructed per standard drawing G-14A or DS-7 to the satisfaction of the Director of Planning & Development Services.

- b. The Pavement taper from the ultimate right-of-way line to the existing edge of pavement, with asphalt concrete to the satisfaction of the Director of Planning & Development Services.
- c. Streetlight at the proposed driveway location per the approved plan for MUP-85-053W2 and to the satisfaction of the Department of Public Works.
- d. Storm drain connection to the existing public main per the approved plan for MUP-85-053W2 and to the satisfaction of the Department of Public Works.
- e. In the case the CIP along East Bradley Avenue has not been completed, the following improvements will be required:
 - 1. Provide a striping plan for the temporary edge line per the approved plan for MUP-85-053W2 and to the satisfaction of the Department of Public Works.
 - 2. Temporary sidewalk to connect the project frontage to the adjacent property per the approved plan for MUP-85-053W2 and to the satisfaction of Department of Public Works.

All plans and improvements shall be completed pursuant to the County of San Diego Public Road Standards. **DOCUMENTATION:** The applicant shall complete the following:

- a. Pay all applicable inspection fees with [*DPW, PDC*].
- b. Obtain approval for the design and construction of all driveways and road improvements to the satisfaction of the San Miguel Consolidated Fire Protection District and the [*PDS, LDR*].
- c. Obtain a Construction Permit for any work within the County Road right-of-way. Contact DPW Construction/Road right-of-way Permits Services Section, (858) 694-3284. Also, before trimming, removing, or planting trees or shrubs in the County Road right-of-way, the applicant must first obtain a permit to remove plant or trim shrubs or trees from the Permit Services Section.

TIMING: Prior to occupancy or use of the premises in reliance of this permit, the plans shall be approved and the improvements shall be installed. **MONITORING:** The [*PDS, LDR*] and [*DPR, TC*] shall review the plans for consistency with the condition and County Standards.

21. **ROADS#3–NO PARKING RESTRICTION**

INTENT: In order to allow for adequate sight distance along *East Bradley Avenue* and to comply with the Public Road Standards and San Miguel Fire Protection District, a no parking restriction shall be provided. **DESCRIPTION OF**

REQUIREMENT: Execute a covenant not to oppose a "No Parking" restriction along the *East Bradley Avenue* frontage of 285'. **DOCUMENTATION:** The applicant shall execute the covenant and record it with the County Recorder. Prior to Recordation, provide the covenant to the [PDS, LDR] for review and approval. **TIMING:** Prior to occupancy or use of the premises in reliance of this permit, the covenant not to oppose the "No parking restriction," shall be executed. **MONITORING:** The [PDS, LDR] shall review the documents to determine adequacy with this condition.

22. STRMWTR#3–VERIFICATION OF STRUCTURAL BMPs

INTENT: In order to promote orderly development and to comply with the County Watershed Protection Ordinance (WPO) No.10410 (County Code Section 67.801 et. seq.), verification of Structural BMPs shall be completed. **DESCRIPTION OF REQUIREMENT:** Complete a Structural BMP Verification Form as shown in Attachment 10 of the PDP SWQMP. **DOCUMENTATION:** The applicant shall process the Structural BMP Verification Forms *with [DPW, PDC] or [PDS, BLDG]*. **TIMING:** Prior to any occupancy, final grading release, or use of the premises in reliance of this permit; execution of the Structural BMP Verification Form shall be completed. **MONITORING:** The [PDS, LDR] and [DPW, WPP] shall review the Structural BMP Verification Forms for consistency with the condition and County Standards.

23. STRMWTR#4–PROVISION OF STORMWATER DOCUMENTATION TO PROPERTY OWNER

INTENT: In order to promote orderly development and to comply with the County Watershed Protection Ordinance (WPO) No.10410 (County Code Section 67.801 et. seq.), stormwater documentation shall be provided to property owner. **DESCRIPTION OF REQUIREMENT:** Demonstrate that copies of the following documents are provided to the property owner and initial occupants:

- a. A copy of the project's approved SWQMP (with attached Operation & Maintenance Plan).
- b. A copy of project's recorded Maintenance Notification Agreement and/or Stormwater Facilities Maintenance Agreement and/or Private Road Maintenance Agreement showing the Structural BMPs pertaining to the property.
- c. Sample copies of the following:
 1. A Letter for Privately Owned Stormwater Treatment Control Best Management Practices Operation and Maintenance Verification.
 2. One Operation and Maintenance Verification Form for each type of Private Treatment Control BMP.

DOCUMENTATION: The applicant shall submit a letter stating that the above documentation has been submitted to the property owner and initial occupants. **TIMING:** Prior to any occupancy, final grading release, or use of the premises in reliance of this permit; provision of stormwater documents shall be completed. **MONITORING:** The [PDS, LDR] and [DPW, WPP] shall review the letter provided by the applicant for consistency with the condition and County Standards.

24. **CULT#3 - CULTURAL RESOURCES MONITORING REPORT**

INTENT: In order to ensure that the Archaeological Monitoring occurred during the earth-disturbing activities, a final report shall be prepared. **DESCRIPTION OF REQUIREMENT:** A final Archaeological Monitoring and Data Recovery Report that documents the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program shall be prepared. The report shall include the following items:

- a. DPR Primary and Archaeological Site forms.
- b. Daily Monitoring Logs
- c. Evidence that all cultural materials collected during the survey, testing, and archaeological monitoring program have been conveyed as follows:
 - (1) All prehistoric cultural materials shall be curated at a culturally affiliated Tribal curation facility or San Diego curation facility that meets federal standards per 36 CFR Part 79, and, therefore, would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records, including title, shall be transferred to the San Diego curation facility or culturally affiliated Tribal curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the prehistoric archaeological materials have been received and that all fees have been paid.

or

Evidence that all prehistoric materials collected during the archaeological monitoring program have been returned to a Native American group of appropriate tribal affinity. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.

- (2) Historic materials shall be curated at a San Diego curation facility as described above and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, including title, shall be transferred to the San Diego curation facility and shall be accompanied by

payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.

- d. If no cultural resources are discovered, a Negative Monitoring Report must be submitted stating that the grading monitoring activities have been completed. Grading Monitoring Logs must be submitted with the negative monitoring report.

DOCUMENTATION: The applicant's archaeologist shall prepare the final report and submit it to the [PDS, PPD] for approval. Once approved, a final copy of the report shall be submitted to the South Coastal Information Center (SCIC) and any culturally-affiliated Tribe who requests a copy. **TIMING:** Prior to any occupancy, final grading release, or use of the premises in reliance of this permit, the final report shall be prepared. **MONITORING:** The [PDS, PPD] shall review the final report for compliance this condition and the report format guidelines. Upon acceptance of the report, [PDS, PPD] shall inform [PDS, LDR] and [DPW, PDCI], that the requirement is complete, and the bond amount can be relinquished. If the monitoring was bonded separately, then [PDS, PPD] shall inform [PDS or DPW FISCAL] to release the bond back to the applicant.

ONGOING: *(The following conditions shall apply during the term of this permit).*

25. PLN#3–SITE CONFORMANCE

INTENT: In order to comply with Zoning Ordinance Section 7703, the site shall substantially comply with the approved plot plans and all deviations thereof, specific conditions and approved building plans. **DESCRIPTION OF REQUIREMENT:** The project shall conform to the approved building plans, and plot plan(s). Failure to conform to the approved plot plan(s); is an unlawful use of the land, and will result in enforcement action pursuant to Zoning Ordinance Section 7703. **DOCUMENTATION:** The property owner and permittee shall conform to the approved plot plan. If the permittee or property owner chooses to change the site design in any way, they must obtain approval from the County for a Minor Deviation or a Modification pursuant to the County of San Diego Zoning Ordinance. **TIMING:** Upon establishment of the use, this condition shall apply for the duration of the term of this permit. **MONITORING:** The [PDS, Code Compliance Division] is responsible for enforcement of this permit.

26. PLN#4–ACCESSORY USES

INTENT: A Minor Deviation or Modification to a Major Use Permit is not required for any building, structure or projection listed in Section 4835 or any use listed in the Accessory Use Regulations, section 6150-6199 (or as otherwise referenced), provided the building, structure, or projection or use meets the specific accessory use setbacks in the Site Plan and meets all other conditions and restriction in the Site Plan. This condition is intended to comply with Zoning Ordinance Section 7175, ensuring the ability to allow for structures as detailed in this section without

Minor Deviation or Modification. **DESCRIPTION OF REQUIREMENT:** The project shall conform to the approved landscape plan(s), building plans, and plot plan(s); should any accessory uses be proposed that do not meet the requirements as detailed in the Zoning Ordinance sections listed above, the property owner shall be responsible for obtaining all necessary permits. **DOCUMENTATION:** None. The property owner and permittee shall conform to the Zoning Ordinance requirements for Accessory Uses as detailed above and within the County Zoning Ordinance. **TIMING:** Upon establishment of the use, this condition shall apply for the duration of the term of this permit. **MONITORING:** The [PDS, Code Enforcement Division] is responsible for enforcement of this permit.

27. **PLN#5–GROUP CARE FACILITY OPERATIONS**

INTENT: In order to comply with applicable regulations and enforce ongoing requirements and design features of the project. **DESCRIPTION OF REQUIREMENT:** The project shall conform to the following operating requirements listed below:

1. The site will operate 24-hours per day, 365 days per year.
2. Hours of operation and visiting hours will be from 8am to 5pm.
3. Three shifts will rotate on-site with a peak number of approximately 40 employees working at any one time.
4. Shuttle services or a similar shared vehicle program for residents of the facility shall be provided.
5. The facility shall operate in conformance with an applicable State License for operations of the facility.
6. The amenities associated the facility such as the salon, group kitchen, etc., shall be limited to the use of residents as well as visitors/guests of residents of the facility. It is not the intent that the amenities are for general public use.

DOCUMENTATION: None. The property owner and permittee shall conform to the applicable requirements. **TIMING:** Upon establishment of the use, this condition shall apply for the duration of the term of this permit. **MONITORING:** The [PDS, Code Enforcement Division] is responsible for enforcement of this permit.

28. **ROADS#4–SIGHT DISTANCE**

INTENT: In order to provide an unobstructed view for safety while exiting the property and accessing a public road from the site, and to comply with the Design Standards of Section 6.1.(E) of the [County of San Diego Public Road Standards](#), an unobstructed sight distance shall be maintained for the life of this permit. **DESCRIPTION OF REQUIREMENT:** There shall be a minimum unobstructed sight distance of **550 Feet** in both directions along **East Bradley Avenue** from the project's proposed driveway opening for the life of this permit. **DOCUMENTATION:** A minimum unobstructed sight shall be maintained. The sight distance of adjacent driveways and street openings shall not be adversely affected by this project at any time. **TIMING:** Upon establishment of the use, this condition shall apply for the duration of the term of this permit. **MONITORING:** The [PDS, Code Compliance Division] is responsible for compliance of this permit.

29. STRMWTR#5–SELF-VERIFICATION OPERATION AND MAINTENANCE LETTER

INTENT: In order to promote orderly development and to comply with the County Watershed Protection Ordinance (WPO) No.10410, County Code Section 67.801 et. seq., an operation and maintenance verification form for each Structural BMPs shall be completed. **DESCRIPTION OF REQUIREMENT:** Every year the property owner shall receive from the County a BMP Verification Form to be completed for each privately owned Structural BMP. **DOCUMENTATION:** Every year the property owner shall file with the County the completed Structural BMP Verification Form stating the maintenance performed during the reporting period for each privately owned Structural BMP with [DPW, WPP]. **TIMING:** Upon establishment of the use, this condition shall apply for the duration of the term of this permit. **MONITORING:** The [DPW, WPP] is responsible for compliance of this permit.

30. PLN#6–SIGNAGE IN ACCORDANCE WITH MUP

INTENT: In order to comply with the Lakeside Community Plan and Sections 7609 (d) and 6252(x) of the Zoning Ordinance. **DESCRIPTION OF REQUIREMENT:** A conceptual sign package listing anticipated square footages and location of signs are included as part of the Major Use Permit Plot Plans. Any future changes to submitted sign packages shall require an applicable minor deviation/modification in accordance with Section 7609(d) of the Zoning Ordinance. Any future changes permitted under an applicable minor deviation or modification shall contain information on plans related to the square footage of signage and shall be evaluated for consistency with the Lakeside Community Plan and Design Guidelines. **DOCUMENTATION:** Upon changes to proposed signage and submittal of minor deviations/modifications to the Major Use Permit for signage changes, the plot plans shall contain sufficient information related to signage consistent with this condition. **TIMING:** Upon establishment of the use, this condition shall apply for the duration of the term of this permit. **MONITORING:** The [PDS, Code Enforcement Division] and [PDS, BPPR] are responsible for enforcement of this permit.

The following Grading Plan Notes shall be placed on the Final Grading Plan and made conditions of the issuance of said permits.

PRE-CONSTRUCTION MEETING: *Prior to any clearing, grubbing, trenching, grading, or any land disturbances.*

31. BIO#1–RESOURCE AVOIDANCE [PDS, FEE X2]

INTENT: In order to avoid impacts to migratory birds, which are a sensitive biological resource pursuant to Migratory Bird Treaty Act (MBTA), a Resource Avoidance Area (RAA), shall be implemented on all plans. **DESCRIPTION OF REQUIREMENT:** There shall be no brushing, clearing and/or grading such that none will be allowed within 300 feet of migratory bird nesting habitat during the breeding season of the migratory bird within RAA as indicated on these plans. The

breeding season is defined as occurring between February 15 and August 15. The Director of PDS [PDS, PCC] may waive this condition, through written concurrence from the US Fish and Wildlife Service and the California Department of Fish and Wildlife, provided that no migratory birds are present in the vicinity of the brushing, clearing, or grading as demonstrated by a survey completed no more than 72-hours prior to the start of brushing, clearing, or grading. **DOCUMENTATION:** The applicant shall provide a letter of agreement with this condition; alternatively, the applicant may submit a written request for waiver of this condition. Although, no grading shall occur within the RAA until concurrence is received from the County and the Wildlife Agencies. **TIMING:** Prior to preconstruction conference and prior to any clearing, grubbing, trenching, grading, or any land disturbances and throughout the duration of the grading and construction, compliance with this condition is mandatory unless the requirement is waived by the County upon receipt of concurrence from the Wildlife Agencies. **MONITORING:** The [DPW, PDCI] shall not allow any grading in the RAA during the specified dates, unless a concurrence from the [PDS, PCC] is received. The [PDS, PCC] shall review the concurrence letter.

32. CULT#GR-1-ARCHAEOLOGICAL AND TRIBAL MONITORING – PRECONSTRUCTION MEETING

INTENT: In order to comply with the County of San Diego Guidelines for Significance – Cultural Resources, an Archaeological Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** The County approved Project Archaeologist and Kumeyaay Native American Monitor shall attend the pre-construction meeting with the contractors to explain and coordinate the requirements of the archaeological monitoring program. The Project Archaeologist and Kumeyaay Native American Monitor shall monitor the original cutting of previously undisturbed deposits in all areas identified for development including off-site improvements. The Project Archaeologist and Kumeyaay Native American monitor shall also evaluate fill soils to determine that they are clean of cultural resources. The archaeological monitoring program shall comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources. **DOCUMENTATION:** The applicant shall have the contracted Project Archeologist and Kumeyaay Native American attend the preconstruction meeting to explain the monitoring requirements. **TIMING:** Prior to any clearing, grubbing, trenching, grading, or any land disturbances this condition shall be completed. **MONITORING:** The [DPW, PDCI] shall confirm the attendance of the approved Project Archaeologist.

DURING CONSTRUCTION: (The following conditions shall apply throughout the duration of project construction).

33. NOISE#2-TEMPORARY CONSTRUCTION NOISE: [DPW, PDCI]

INTENT: In order to minimize temporary construction noise for grading operations associated with the project and to comply with County Noise Ordinance 36.408

and 36.409. **DESCRIPTION OF REQUIREMENT:** The project shall comply with the following temporary construction noise control measures:

- Install temporary sound barriers/blankets along the eastern, western, and southern boundaries adjacent to the multi-family receivers. The temporary barriers/blankets shall have a minimum sound transmission loss of 21 and noise reduction coefficient of 0.75. The temporary barriers/blankets will be of sufficient height to extend from the top of the temporary construction fence and drape on the ground or be sealed at the ground. The temporary barriers/blankets will have grommets along the top edge with exterior grade hooks, and loop fasteners along the vertical edges with overlapping seams, with a minimum overlap of 2 inches.
- Provide a sign at the yard entrance, or other conspicuous location, that includes a 24-hour telephone number for project information, and a procedure where a field engineer/construction manager will respond to and investigate noise complaints and take corrective action if necessary, in a timely manner. The sign will have a minimum dimension of 48 inches wide by 24 inches high. The sign will be placed 5 feet above ground level.
- If a noise complaint(s) is registered, the contractor will retain a County-approved noise consultant to conduct noise measurements at the use(s) that registered the complaint. The noise measurements will be conducted for a minimum of 1 hour and will include 1-minute intervals. The consultant will prepare a letter report for code enforcement summarizing the measurements, calculation data used in determining impacts, and potential measures to reduce noise levels to the maximum extent feasible.
- The following measures may also be used to reduce noise levels:
- The use of bells, whistles, alarms, and horns shall be restricted to safety warning purposes only.
- Noise-reducing enclosures shall be used around stationary noise-generating equipment (e.g., compressors and generators) or located as far from sensitive receivers, as feasible.

DOCUMENTATION: The applicant shall comply with the temporary construction noise measures of this condition. **TIMING:** The following actions shall occur throughout the duration of the grading construction. **MONITORING:** The [DPW, PDCI] shall make sure that the grading contractor complies with the construction noise control measures of this condition. The [DPW, PDCI] shall contact the [PDS, PCC] if the applicant fails to comply with this condition.

34. **CULT#GR-2-ARCHAEOLOGICAL AND TRIBAL MONITORING – DURING CONSTRUCTION**

INTENT: In order to comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources, a Cultural Resource Grading Monitoring Program shall be implemented. **DESCRIPTION**

OF REQUIREMENT: The Project Archaeologist and Kumeyaay Native American Monitor shall monitor the original cutting of previously undisturbed deposits in all areas identified for development including off-site improvements. The archaeological monitoring program shall comply with the following requirements during earth-disturbing activities:

- a. **Monitoring.** During the original cutting of previously undisturbed deposits, the Project Archaeologist and Kumeyaay Native American Monitor shall be onsite as determined necessary by the Project Archaeologist. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor. Monitoring of the cutting of previously disturbed deposits will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor.
- b. **Inadvertent Discoveries.** In the event that previously unidentified potentially significant cultural resources are discovered:
 1. The Project Archaeologist or the Kumeyaay Native American monitor shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources.
 2. At the time of discovery, the Project Archaeologist shall contact the PDS Staff Archaeologist.
 3. The Project Archaeologist, in consultation with the PDS Staff Archaeologist and the Kumeyaay Native American Monitor, shall determine the significance of the discovered resources.
 4. Construction activities will be allowed to resume in the affected area only after the PDS Staff Archaeologist has concurred with the evaluation.
 5. Isolates and clearly non-significant deposits shall be minimally documented in the field. Should the isolates and/or non-significant deposits not be collected by the Project Archaeologist, then the Kumeyaay Native American monitor may collect the cultural material for transfer to a Tribal Curation facility or repatriation program.
 6. If cultural resources are determined to be significant, a Research Design and Data Recovery Program (Program) shall be prepared by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor. The County Archaeologist shall review and approve the Program, which shall be carried out using professional archaeological methods. The Program shall include (1) reasonable efforts to preserve (avoidance) "unique" cultural resources or Sacred Sites; (2) the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap, if avoidance is infeasible; and (3) data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).

c. **Human Remains.** If any human remains are discovered:

1. The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
2. Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Kumeyaay Native American monitor.
3. If the remains are determined to be of Native American origin, the NAHC shall immediately contact the Most Likely Descendant (MLD).
4. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
5. The MLD may with the permission of the landowner, or their authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.
6. Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.

d. **Fill Soils.** The Project Archaeologist and Kumeyaay Native American monitor shall evaluate fill soils to determine that they are clean of cultural resources.

DOCUMENTATION: The applicant shall implement the Archaeological Monitoring Program pursuant to this condition. **TIMING:** The following actions shall occur throughout the duration of the earth disturbing activities. **MONITORING:** The [DPW, PDCI] shall make sure that the Project Archeologist is on-site performing the monitoring duties of this condition. The [DPW, PDCI] shall contact the [PDS, PPD] if the Project Archeologist or applicant fails to comply with this condition.

35. **PALEO#GR-1–PALEONTOLOGICAL MONITORING**

INTENT: In order to comply with the [San Diego County Guidelines for Determining Significance for Paleontological Resources](#), a Paleontological Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** This project site has marginal levels of sensitive Paleontological resources. All grading activities are subject to the [County of San Diego Grading Ordinance Section 87.430](#), if any significant resources (Fossils) are encountered during grading activities.

- a. The grading contractor is responsible to monitor for paleontological resources during all grading activities. If any fossils are found greater than 12 inches in any dimension, stop all grading activities and contact PDS before continuing grading operations.
- b. If any paleontological resources are discovered and salvaged, the monitoring, recovery, and subsequent work determined necessary shall be completed by or under the supervision of a Qualified Paleontologist pursuant to the [San Diego County Guidelines for Determining Significance for Paleontological Resources](#).

TIMING: The following actions shall occur throughout the duration of the grading construction. **MONITORING:** The [DPW, PDCI] shall make sure that the grading contractor is on-site performing the Monitoring duties of this condition. The [DPW, PDCI] shall contact PDS if the grading contractor or applicant fails to comply with this condition.

36. **AQ#1–CONSTRUCTION ARCHITECTURAL COATINGS**

INTENT: In order to reduce emissions of volatile organic compounds (VOC).

DESCRIPTION OF REQUIREMENT: According to SDAPCD Rule 67.0.1, the project shall use architectural coatings with a VOC content of 100 grams per liter (g/L) or less for exterior coatings and 50 g/L or less for interior coatings.

DOCUMENTATION: The applicant shall comply with the Air Quality requirements of this condition. **TIMING:** The following action shall occur throughout the duration of the construction activities involving the application of architectural coatings.

MONITORING: The [DLPU, BI] shall make sure that the construction contractor complies with the Air Quality requirement of this condition. The [DLPU, BI] shall contact the [PDS, PCC] if the applicant fails to comply with this condition.

37. **AQ-#2–FUGITIVE DUST**

INTENT: In order to mitigate for fugitive dust during construction activities.

DESCRIPTION OF REQUIREMENT: The project applicant or designee shall comply with the San Diego County Air Pollution Control District (SDAPCD) Rule 55 and County Code Section 87.428 (Grading Ordinance), and implement the following dust control measures during construction:

- a. Maintain at least 12 inches of freeboard, cover loads, or secure material by watering or treating in all haul/dump trucks entering or leaving the site with soil import/export material.
- b. Water construction areas between dozer/scrapper passes and on any unpaved roads within the project limits a minimum of two (2) times daily.
- c. Terminate grading activities in winds in excess of 25 miles per hour (mph).
- d. Use sweepers and water trucks to control dust and debris at public street access points and approach routes to construction sites.
- e. Stabilize dirt storage piles with chemical binders, tarps, fencing, or other suppression measures.

- f. Stabilize internal construction-roadways by paving, chip sealing or chemicals after rough grading.
- g. Enforce a 15-mph speed limit on unpaved surfaces.
- h. Hydroseed, landscape, or develop disturbed areas as quickly as possible and as directed by the County and/or SDAPCD to reduce dust generation.
- i. Visible roadway dust as a result of active operations, spillage from transport trucks, erosion, or track-out/carry-out shall be minimized by the use of track-out grates, gravel beds, or wheel-washing at each egress point and be removed at the conclusion of each workday when active operations cease, or every 24 hours for continuous operations. If a street sweeper is used to remove any trackout/ carry-out, only respirable particulate matter (PM10) -efficient street sweepers certified to meet the most current South Coast Air Quality Management District (SCAQMD) Rule 1186 requirements shall be used. The use of blowers for removal of track-out/carry-out is prohibited under any circumstances.

DOCUMENTATION: The applicant or designee shall comply with the Air Quality requirements of this condition. **TIMING:** The following actions shall occur throughout the duration of construction and grading. **MONITORING:** The [DPW, PDCI] shall make sure that the grading contractor complies with the Air Quality requirements of this condition. The [DPW, PDCI] shall contact the [PDS, PCC] if the applicant fails to comply with this Condition.

ROUGH GRADING: *(Prior to rough grading approval and issuance of any building permit).*

38. **CULT#GR-3—ARCHAEOLOGICAL AND TRIBAL MONITORING – ROUGH GRADING**

INTENT: In order to comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources, an Archaeological Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** The Project Archaeologist shall prepare one of the following reports upon completion of the earth-disturbing activities that require monitoring:

- a. **No Archaeological Resources Encountered.** If no archaeological resources are encountered during earth-disturbing activities, then submit a final Negative Monitoring Report substantiating that earth-disturbing activities are completed, and no cultural resources were encountered. Archaeological monitoring logs showing the date and time that the monitor was on site and any comments from the Native American Monitor must be included in the Negative Monitoring Report.
- b. **Archaeological Resources Encountered.** If archaeological resources were encountered during the earth disturbing activities, the Project Archaeologist shall provide an Archaeological Monitoring Report stating that the field

monitoring activities have been completed, and that resources have been encountered. The report shall detail all cultural artifacts and deposits discovered during monitoring and the anticipated time schedule for completion of the curation and/or repatriation phase of the monitoring.

DOCUMENTATION: The applicant shall submit the Archaeological Monitoring Report to [PDS, PPD] for review and approval. Once approved, a final copy of the report shall be submitted to the South Coastal Information Center and any culturally-affiliated Tribe who requests a copy. **TIMING:** Upon completion of all earth-disturbing activities, and prior to Rough Grading Final Inspection (Grading Ordinance SEC 87.421.a.2), the report shall be completed. **MONITORING:** [PDS, PPD] shall review the report or field monitoring memo for compliance with the project MMRP, and inform [DPW, PDCI] that the requirement is completed.

39. PALEO#GR-2 - PALEONTOLOGICAL MONITORING

INTENT: In order to comply with the [County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Paleontological Resources](#), a Paleontological Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** One of the following letters shall be performed upon completion of the grading activities that require monitoring:

- a. If no paleontological resources were discovered, submit a “No Fossils Found” letter from the grading contractor to PDS stating that the monitoring has been completed and that no fossils were discovered, and including the names and signatures from the fossil monitors. The letter shall be in the format of Attachment E of the [County of San Diego Guidelines for Determining Significance for Paleontological Resources](#).
- b. If paleontological resources were encountered during grading, a letter shall be prepared stating that the field grading monitoring activities have been completed, and that resources have been encountered. The letter shall detail the anticipated time schedule for completion of the curation phase of the monitoring.

DOCUMENTATION: The applicant shall submit the letter report to PDS for review and approval. **TIMING:** Upon completion of all grading activities, and prior to Rough Grading Final Inspection ([Grading Ordinance SEC 87.421.a.2](#)), the letter report shall be completed. **MONITORING:** PDS shall review the final negative letter report or field monitoring memo for compliance with the project MMRP, and inform [DPW, PDCI] that the requirement is completed.

FINAL GRADING RELEASE: (Prior to any occupancy, final grading release, or use of the premises in reliance of this permit).

40. CULT#GR-4 - ARCHAEOLOGICAL AND TRIBAL MONITORING – FINAL GRADING

INTENT: In order to comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources, an Archaeological Monitoring Program shall be implemented.

DESCRIPTION OF REQUIREMENT: The Project Archaeologist shall prepare a final report that documents the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program if cultural resources were encountered during earth-disturbing activities. The report shall include the following, if applicable:

- a. Department of Parks and Recreation Primary and Archaeological Site forms.
- b. Daily Monitoring Logs
- c. Evidence that all cultural materials have been conveyed as follows:

(1) Evidence that all prehistoric materials collected during the archaeological monitoring program have been submitted to a culturally affiliated Native American Tribal curation facility or San Diego curation facility a that meets federal standards per 36 CFR Part 79, and, therefore, would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records, including title, shall be transferred to the San Diego curation facility or culturally affiliated Native American Tribal curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the prehistoric archaeological materials have been received and that all fees have been paid.

or

Evidence that all prehistoric materials collected during the grading monitoring program have been repatriated to a Native American group of appropriate tribal affinity and shall be accompanied by payment of the fees necessary, if required. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.

(2) Historic materials shall be curated at a San Diego curation facility and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, including title, shall be transferred to the San Diego curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.

- d. If no cultural resources are discovered, a Negative Monitoring Report must be submitted stating that the archaeological monitoring activities have been completed. Grading Monitoring Logs must be submitted with the negative monitoring report.

DOCUMENTATION: The applicant’s archaeologist shall prepare the final report and submit it to [PDS, PPD] for approval. Once approved, a final copy of the report shall be submitted to the South Coastal Information Center (SCIC) and any culturally-affiliated Tribe who requests a copy. **TIMING:** Prior to any occupancy, final grading release, or use of the premises in reliance of this permit, the final report shall be prepared. **MONITORING:** [PDS, PPD] shall review the final report for compliance with this condition and the report format guidelines. Upon acceptance of the report, [PDS, PPD] shall inform [PDS, LDR] and [DPW, PDCI], that the requirement is complete and the bond amount can be relinquished. If the monitoring was bonded separately, then [PDS, PPD] shall inform [PDS or DPW FISCAL] to release the bond back to the applicant.

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MITIGATION MONITORING OR REPORTING PROGRAM (MMRP): Public Resources Code Section 21081.6 requires the County to adopt a Mitigation Monitoring or Reporting Program for any project approved with the adoption of a Mitigated Negative Declaration or with the certification of an Environmental Impact Report, for which changes in the project are required in order to avoid significant impacts. Section 21081.6(a)(1) states, in part:

The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation.

Section 21081(b) further states:

A public agency shall provide {that} the measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures.

As indicated above, a Mitigation Monitoring or Reporting Program is required to assure that a project is implemented in compliance with all required mitigation measures. The Mitigation Monitoring or Reporting Program (MMRP) for this project is incorporated into the mitigation measures adopted as project conditions of approval. Each mitigation measure adopted as a condition of approval (COA) includes the following five components.

Intent: An explanation of why the mitigation measure (MM) was imposed on the project.

Description: A detailed description of the specific action(s) that must be taken to mitigate or avoid impacts.

Documentation: A description of the informational items that must be submitted by the applicant to the Lead Agency to demonstrate compliance with the COA.

Timing: The specific project milestone (point in progress) when the specific required actions are required to implemented.

Monitoring: This section describes the actions to be taken by the lead agency to assure implementation of the mitigation measure.

The following conditions of approval required to mitigate or avoid significant impacts on the environment are listed below and constitute the MMRP for this project:

Condition(s): 9 (CULT#1), 10 (CULT#2), 14 (GHG#1), 15 (NOISE#1), 23 (CULT#3), GP31 (BIO#1), GP32 (CULT# GR-1), GP33 (NOISE#2), GP34(CULT#GR-2), GP35 (PALEO#GR-1), GP36 (AQ#1), GP37 (AQ#2), GP38 (CULT#GR-3), GP39 (PALEO#GR-2), GP40 (CULT#GR-4)
.....

MAJOR USE PERMIT FINDINGS

Pursuant to Section 7358 of The Zoning Ordinance, the following findings in support of the granting of the Major Use Permit are made:

(a) *The location, size, design, and operating characteristics of the proposed use will be compatible with adjacent uses, residents, buildings, or structures with consideration given to*

1. *Harmony in scale, bulk, coverage, and density*

The properties surrounding the project site are mostly developed with multi-family and single-family residential uses and some commercial and industrial uses. To the south, southeast and southwest of the site are apartment buildings and apartment complexes. Further south is a large industrial building. A commercial center and the San Miguel Fire Station lie to the east of the site and southeast and west of the site are also apartment buildings. North of the site across Bradley Avenue is a mobile home park. The project is compatible with the surrounding properties with respect to scale, bulk, coverage, and density. Staff has analyzed the Project in relation to each of these items and has determined that the proposed location, size, design, and operating characteristics of the Project will be compatible with adjacent uses, residences, and commercial areas.

The scale and bulk of the proposed expansion will be compatible with the surrounding area. The two proposed buildings are consistent with the allowable height of 35-feet and maximum of two stories. Building 3 is 21 feet 6 inches high and is a one-story building. Building 4 is 23 feet high and consists of two stories and a basement. A Preliminary Landscaping Plan

was submitted for the project with landscaping proposed on all visible sides of the proposed development. Landscaping is proposed to help break up the bulk of the buildings. Trees and shrubs will be added along the perimeter of the project site. Apartment buildings to the west of the project site share a comparable bulk and scale with the proposed project. Therefore, as demonstrated above, the proposed project would be consistent with the scale and bulk of existing uses in the surrounding area.

Lot coverage is the amount of building area that occupies an individual property and is expressed as a percentage (building area divided by the total lot area). Based on the zoning, there are no coverage requirements for this site. The proposed development would greatly increase the size of the existing facility. However, because 30-40% of the project site is currently undeveloped, the addition of the two buildings will not impact the Project's compatibility with the surrounding area. The coverage of the surrounding uses ranges from 14% to 57%. The total coverage on the project site after the expansion will total approximately 34% as the lot is sufficiently large enough to accommodate the expansion. Therefore, the project will be similar in coverage to lots in the area.

The project site, as well as surrounding areas, are designated in the County's General Plan as Village Residential (VR-15 and VR-24) and Neighborhood Commercial. Properties within the Village Residential zones are allowed a density of up to 15 dwelling units per acre in the VR-15 zone, and 24 dwelling units per acres in the VR-24 zone. The Village densities are the highest densities allowed in the County of San Diego's General Plan. Therefore, although a maximum density is not regulated for this type of project, the high density of the proposed project is compatible with the surrounding density.

2. *The availability of public facilities, services, and utilities*

Sewer service would be provided by Padre Dam Municipal Water District from an existing sewer line on East Bradley Ave. The project would receive water from the Helix Water District, which has adequate water to serve the project according to the water service availability form dated March 2022. The San Miguel Fire District has indicated that there are adequate services and an acceptable response time for the proposed project.

3. *The harmful effect, if any, upon desirable neighborhood character:*

The expansion of the convalescent center will not have a harmful effect on the neighborhood character. The neighborhood mostly consists of multi-family housing with some interspersed commercial areas and a mobile home park. The proposed expansion is designed to be harmonious with the existing buildings on the site and the surrounding neighborhood. The facility

has been designed to flow within the natural surroundings and step up the hill from Bradley Avenue. Surrounding apartments and other facilities along Bradley Avenue use a similar approach. The proposed project would include extensive landscaping, various patio areas, and walkways throughout the site.

The project would not detract from, or contrast with the existing visual character and/or quality of the surrounding areas. The buildings have been designed to be one- and two-story buildings in earth tones (light matte greens, beige, grays, tans) with low-pitched roofs to reflect the character of existing uses found in the project vicinity. Adequate parking is provided on the property so cars will not need to park on the street. The existing parking area would be redesigned to accommodate the proposed buildings and provide 73 parking spaces, including 5 electric vehicle (EV) charging spaces. The proposed project would include a new fire lane access road allowing access to the rear of existing Building 2 and the new Building 3. Landscaping is proposed to help break up the view of the buildings' appearance and trees and shrubs will be added along the perimeter of the project site.

The proposed project also aligns with the General Plan's vision for village areas by serving as a community-serving facility. The proposed facility is designed to support residents with varying degrees of physical ailments and mental health needs within the community. Therefore, the project is beneficial to the community and is located in an area with high connectivity and accessibility from surrounding residential neighborhoods. The project is located along East Bradley Ave, which is a 4.1B Major Road in the San Diego County General Plan Mobility Element. It is fully paved with sidewalks and consists of multiple bus stops. Therefore, the proposed location, size, design, and operating characteristics of the Project will be compatible with adjacent uses, residences, and commercial areas.

4. *The generation of traffic and the capacity and physical character of surrounding streets:*

A Transportation Analysis was prepared for the Project by Linscott Law and Greenspan (LLC) which included a Vehicle Miles Traveled (VMT) analysis and a Local Mobility Analysis (LMA). The VMT analysis identified the site as an Infill Area and was presumed to have a less than significant VMT impact and no VMT mitigation measures are required. The LMA analyzed safety and operations of nearby roads. The proposed Project was calculated to generate 263 new daily trips with 19 AM peak hour trips (12 inbound / 7 outbound) and 26 PM peak hour trips (10 inbound / 16 outbound). The Project traffic was distributed and assigned to the street system based on the distribution of the Project shown in the existing driveway counts, as well as a review of the site location, proximity to State

Route 67 (SR 67), existing traffic patterns in the area, a review of trip distribution of similar land uses from recently approved development projects in the vicinity and anticipated traffic patterns to and from the site. East Bradley Avenue currently operates at Level of Service (LOS) B and C at the intersection of Sams Hill Road and at the project driveway. With the addition of the Project, these intersections will remain at LOS B and C. Therefore, the traffic study concluded that the additional trips would not result in any significant impacts.

The project would not substantially alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road. The proposed project would not significantly alter roadway geometry on East Bradley Avenue. The project site currently takes access from East Bradley Avenue, a County maintained road, via a single full access driveway on the west side of the project site. This driveway is proposed to be relocated eastward to be more centered to the project site.

In order to determine if vehicles turning left into the project site would cause a queue resulting in potential congestion and backups along Bradley Avenue in the westbound direction, the Transportation Analysis included a queuing analysis at the project's driveway. The Transportation Analysis determined that even with the provided on-street parking, vehicles traveling in the westbound direction should be able to maneuver around the project's inbound trips. Therefore, access to the project driveway would function adequately.

5. *The suitability of the site for the type and intensity of use or development, which is proposed:*

This project is a request to expand the existing convalescent center on a 3.4-acre lot. Currently, the project site contains two skilled nursing buildings. The expansion would add an adult residential facility and a new skilled nursing building. The 3.4-acre lot is an appropriate size to support a 4-building facility. Currently, the site is only partially developed. The proposed expansion would fit on the project site without needing to encroach into any required setbacks and there is adequate space for all the required parking on the site.

The project site is relatively flat and has a gentle rising slope from north to south, rising from an elevation of approximately 442 feet at the northern portion of the entrance to approximately 470 feet at the southern portion of the site. Therefore, no major earth movement is required for the development. The proposed grading for the expansion consists of a balanced cut and fill of 4,525 cubic yards of material. No export of fill would be required.

Located approximately 0.4 mile east of State Route 67, the location of the site is suitable for the proposed use. The site is surrounded by high density residential development and is easily accessible to the surrounding residents. There are also a variety of neighborhood commercial uses nearby.

6. *Any other relevant impact of the proposed use:*

None.

(b) *The impacts, as described in Findings (a) above, and the location of the proposed use will be consistent with the San Diego County General Plan:*

The project site is within a Village General Plan Designation. The Village regional categories identify areas where a higher intensity and a wide range of land uses are established or have been planned. Village areas are typically served by both water and wastewater systems. Ideally, a Village would reflect a development pattern that is characterized as compact, higher density development that is located within walking distance of commercial services, employment centers, civic uses, and transit (when feasible). The project site is zoned Urban Residential (RU) with a Village core designator, and the proposed development involves expanding an existing convalescent facility that has been operating in the community since 1998. The site is adjacent to other commercial developments and multi-family residential uses. The proposed project aligns with the General Plan's vision for village areas by serving as a community-serving facility, providing both private and public services.

(c) *That the requirements of the California Environmental Quality Act have been complied with:*

The project has been reviewed for compliance with the CEQA and a Mitigated Negative Declaration (MND) was prepared and was available for 33-day public review period from December 12, 2024, through January 13, 2025. The CEQA documentations are on file with PDS under Environmental Log Number PDS2021-ER-21-14-004. The MND found that the Project, with incorporation of mitigation measures, will not cause any significant effects on the environment. Mitigation measures for biological resources, archaeological monitoring, and paleontological monitoring have been included in the conditions of approval for the proposed project.

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ORDINANCE COMPLIANCE NOTIFICATIONS: The project is subject to, but not limited to the following County of San Diego, State of California, and U.S. Federal Government, Ordinances, Permits, and Requirements:

STORMWATER ORDINANCE COMPLIANCE: In order to Comply with all applicable stormwater regulations the activities proposed under this application are subject to enforcement under permits from the San Diego Regional Water Quality Control Board (SDRWQCB) and the County of San Diego Watershed Protection, Stormwater Management, and Discharge Control Ordinance No. 10410 and all other applicable ordinances and standards for the life of this permit. The project site shall be in compliance with all applicable stormwater regulations referenced above and all other applicable ordinances and standards. This includes compliance with the approved Stormwater Management Plan, all requirements for Low Impact Development (LID), Hydromodification, materials and wastes control, erosion control, and sediment control on the project site. Projects that involve areas 1 acre or greater require that during construction the property owner keeps the Storm Water Pollution Prevention Plan (SWPPP) onsite and update it as needed. The property owner and permittee shall comply with the requirements of the stormwater regulations referenced above.

LOW IMPACT DEVELOPMENT NOTICE: The San Diego Regional Water Quality Control Board (SDRWQCB) issued a new Municipal Stormwater Permit under the National Pollutant Discharge Elimination System (NPDES). The requirements of the Municipal Permit were implemented beginning in May 2013. *Project design shall be in compliance with the new Municipal Permit regulations.* The Low Impact Development (LID) Best Management Practices (BMP) Requirements of the Municipal Permit can be found at the following link:

[http://www.sandiegocounty.gov/content/dam/sdc/dpw/WATERSHED PROTECTION PROGRAM/susmppdf/lid_handbook_2014sm.pdf](http://www.sandiegocounty.gov/content/dam/sdc/dpw/WATERSHED_PROTECTION_PROGRAM/susmppdf/lid_handbook_2014sm.pdf)

The County has provided a LID Handbook as a source for LID information and is to be utilized by County staff and outside consultants for implementing LID in our region. See link below. <http://www.sdcounty.ca.gov/dplu/docs/LID-Handbook.pdf>

DRAINAGE: The project shall follow the County of San Diego Flood Damage Prevention Ordinance No. 10091, adopted December 8, 2010.

GRADING PERMIT REQUIRED: A grading permit is required prior to commencement of grading when quantities exceed 200 cubic yards of movement of material or eight feet (8') of cut/fill per criteria of Section 87.201 of Grading Ordinance.

CONSTRUCTION PERMIT REQUIRED: A Construction Permit and/or Encroachment Permit are required for all work within the County Road right-of-way. Contact DPW Construction/Road right-of-way Permits Services Section, (858) 694-3275, to coordinate departmental requirements. In addition, before trimming, removing, or planting trees or shrubs in the County Road right-of-way, the applicant must first obtain a permit to remove plant or trim shrubs or trees from the Permit Services Section.

JURISDICTIONAL WATERBODIES NOTICE: The subject property contains wetlands, a lake, a stream, and/or waters of the U.S. which may be subject to regulation by State

and/or federal agencies, including, but not limited to, the Regional Water Quality Control Board, U.S. Army Corps of Engineers and the California Department of Fish and Wildlife. It is the applicant's responsibility to consult with each agency to determine if a permit, agreement or other approval is required and to obtain all necessary permits, agreements or approvals before commencing any activity which could impact the wetlands, lake, stream, and/or waters of the U.S. on the subject property. The agency contact information is provided below.

- U.S. Army Corps of Engineers: 6010 Hidden Valley Rd, Suite 105, Carlsbad, CA 92011-4219; (858) 674-5386; <http://www.usace.army.mil/>
- Regional Water Quality Control Board: 9174 Sky Park Court, Suite 100, San Diego, CA 92123-4340; (858) 467-2952; <http://www.waterboards.ca.gov/sandiego/>
- United States Fish and Wildlife Service: 2177 Salk Ave, Suite 250, Carlsbad, CA 92008;(760)431-9440; <https://www.fws.gov/>
- California Department of Fish and Wildlife: 3883 Ruffin Rd., San Diego, CA 92123; (858) 467-4201; <http://www.dfg.ca.gov/>

NOISE ORDINANCE COMPLIANCE: In order to comply with the County Noise Ordinance 36.401 et seq. and the Noise Standards pursuant to the General Plan Noise Element (Table N-1 & N-2), noise generating equipment and project related noise sources associated with the future use and discretionary actions shall be subject to further noise evaluation. The owner or applicant of the project shall demonstrate that the proposed project complies with the sound level limits pursuant to the Noise Ordinance Section 36.404 and the General Plan Noise Elements.

NOTICE: To comply with State law, the applicant/owner must file the Notice of Determination (NOD)/Notice of Exemption (NOE) signed by the lead agency and remit required fees to the County Clerk's Office within five (5) working days of the date of project approval. Payment or sufficient proof of prior payment to the County Clerk is required at the time of filing. The filing of a NOD or NOE reduces the period of time the CEQA document can be challenged to **35 days**. However, if the NOD/NOE is not filed, this period is extended to **180 days**. The CDFW adjusts fees annually based on inflation. You must pay the amount effective January 1 of the year of the project decision.

NOTICE: Time Extension requests cannot be processed without updated project information including new Department of Environmental Health certification of septic systems. Since Department of Environmental Health review may take several months, applicants anticipating the need for Time Extensions for their projects are advised to submit applications for septic certification to the Department of Environmental Health several months prior to the expiration of their Tentative Maps.

EXPLANATION OF COUNTY DEPARTMENT AND DIVISION ACRONYMS

Planning & Development Services (PDS)
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Project Planning Division	PPD	Land Development Project Review Teams	LDR
Permit Compliance Coordinator	PCC	Project Manager	PM
Building Plan Process Review	BPPR	Plan Checker	PC
Building Division	BD	Map Checker	MC
Building Inspector	BI	Landscape Architect	LA
Zoning Counter	ZO		
Department of Public Works (DPW)			
Private Development Construction Inspection	PDCI	Environmental Services Unit Division	ESU
Department of Environmental Health (DEH)			
Land and Water Quality Division	LWQ	Local Enforcement Agency	LEA
Vector Control	VCT	Hazmat Division	HMD
Department of Parks and Recreation (DPR)			
Trails Coordinator	TC	Group Program Manager	GPM
Parks Planner	PP		
Department of General Service (DGS)			
Real Property Division	RP		

APPEAL PROCEDURE: Within ten calendar days after the date of this Decision of the Planning Commission, the decision may be appealed to the Board of Supervisors in accordance with Section 7366 of the County Zoning Ordinance. An appeal shall be filed with the Director of Planning & Development Services or by mail with the Secretary of the Planning Commission within TEN CALENDAR DAYS of the date of this notice AND MUST BE ACCOMPANIED BY THE DEPOSIT OR FEE AS PRESCRIBED IN THE DEPARTMENT'S FEE SCHEDULE, PDS FORM #369, pursuant to Section 362 of the San Diego County Administrative Code. If the tenth day falls on a weekend or County holiday, an appeal will be accepted until 4:00 p.m. on the following day the County is open for business. Filing of an appeal will stay the decision of the Director until a hearing on your application is held and action is taken by the Planning Commission. Furthermore, the 90-day period in which the applicant may file a protest of the fees, dedications or exactions begins on the date of approval of this Decision.

DEPARTMENT OF PLANNING AND DEVELOPMENT SERVICES
VINCE NICOLETTI, INTERIM DIRECTOR

BY:

Mark Slovick, Chief
Project Planning Division

Planning & Development Services

email cc:

Taylor Ryan, Team Leader, Land Development/Engineering, PDS
Daniella Hofreiter, Project Planning, PDS
Bret Ilick, Project Applicant, bret@warmingtongroup.com

Attachment C – Environmental Documentation



County of San Diego

VINCE NICOLETTI
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 210, SAN DIEGO, CA 92123
(858) 505-6445 General • (858) 694-2705 Code Compliance
(858) 565-5920 Building Services

MITIGATED NEGATIVE DECLARATION

PROJECT NAME: Bradley Court Convalescent Center

RECORD ID: PDS2021-MUP-85-053W2

ENVIRONMENTAL LOG NO.: PDS2021-ER-21-14-004

This Document is Considered Draft Until it is Adopted by the Appropriate County of San Diego Decision-Making Body.

This Mitigated Negative Declaration is comprised of this form along with the Environmental Initial Study that includes the following:

- a. Initial Study Form
- b. Environmental Analysis Form and attached extended studies for the Project
- c. Multiple Species Conservation Plan Findings of Conformance
- d. Ordinance Compliance Checklist

1. California Environmental Quality Act Negative Declaration Findings:

Find, that this Mitigated Negative Declaration reflects the decision-making body's independent judgment and analysis, and; that the decision-making body has reviewed and considered the information contained in this Mitigated Negative Declaration and the comments received during the public review period; and that revisions in the project plans or proposals made by or agreed to by the project applicant would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and, on the basis of the whole record before the decision-making body (including this Mitigated Negative Declaration) that there is no substantial evidence that the project as revised will have a significant effect on the environment.

2. Required Mitigation Measures:

Refer to the attached Environmental Initial Study for the rationale for requiring the following measures:

NOISE#1–NOISE REQUIREMENT

INTENT: In order to reduce the exposure to noise levels in excess of standards established by the County of San Diego General Plan Noise Element (Table N-1 & N-2), and to mitigate the noise exposure of exterior noise sensitive land uses below levels of significance as evaluated in the County Noise Guidelines for Determining Significance, the following design measures shall be implemented on the building plans and incorporated into the site design. **DESCRIPTION OF REQUIREMENT:** The following design elements and noise attenuation measures shall be implemented and indicated on the building plans and made conditions of its issuance:

- The project shall include an 8-foot-high enclosure around the replacement backup emergency generator as shown on the plot plan.

DOCUMENTATION: The applicant shall place the design elements, or notes on the building plans and submit the plans to *[PDS, BPPR]* for review and approval. **TIMING:** Prior to issuance of any building permit, the design elements and noise attenuation measures shall be incorporated into the building plans. **MONITORING:** The *[PDS, BPPR]* shall verify that the specific note(s), and design elements, and noise attenuation measures have been placed on all sets of the building plans and made conditions of its issuance.

NOISE#2–TEMPORARY CONSTRUCTION NOISE: [DPW, PDCI].

INTENT: In order to minimize temporary construction noise for grading operations associated with the projectand to comply with County Noise Ordinance 36.408 and 36.409. **DESCRIPTION OF REQUIREMENT:** The project shall comply with the following temporary construction noise control measures:

- Install temporary sound barriers/blankets along the eastern, western, and southern boundaries adjacent to the multi-family receivers. The temporary barriers/blankets shall have a minimum sound transmission loss of 21 and noise reduction coefficient of 0.75. The temporary barriers/blankets will be of sufficient height to extend from the top of the temporary construction fence and drape on the ground or be sealed at the ground. The temporary barriers/blankets will have grommets along the top edge with exterior grade hooks, and loop fasteners along the vertical edges with overlapping seams, with a minimum overlap of 2 inches.
- Provide a sign at the yard entrance, or other conspicuous location, that includes a 24-hour telephone number for project information, and a procedure where a field engineer/construction manager will respond to and investigate noise complaints and take corrective action if necessary, in a timely manner. The sign will have a minimum dimension of 48 inches wide by 24 inches high. The sign will be placed 5 feet above ground level.
- If a noise complaint(s) is registered, the contractor will retain a County-approved noise consultant to conduct noise measurements at the use(s) that registered the complaint. The noise measurements will be conducted for a minimum of 1 hour and will include 1-minute intervals. The consultant will prepare a letter report for code enforcement summarizing the measurements, calculation data used in determining impacts, and potential measures to reduce noise levels to the maximum extent feasible.
- The following measures may also be used to reduce noise levels:

- The use of bells, whistles, alarms, and horns shall be restricted to safety warning purposes only.
- Noise-reducing enclosures shall be used around stationary noise-generating equipment (e.g., compressors and generators) or located as far from sensitive receivers, as feasible.

DOCUMENTATION: The applicant shall comply with the temporary construction noise measures of this condition. **TIMING:** The following actions shall occur throughout the duration of the grading construction. **MONITORING:** The [DPW, PDCI] shall make sure that the grading contractor complies with the construction noise control measures of this condition. The [DPW, PDCI] shall contact the [PDS, PCC] if the applicant fails to comply with this condition

CULT#1 - ARCHAEOLOGICAL AND TRIBAL MONITORING

INTENT: In order to mitigate for potential impacts to undiscovered buried archaeological resources and human remains, an Archaeological and Tribal Monitoring Program and potential Data RecoNOISEvery Program shall be implemented pursuant to the County of San Diego Guidelines for Determining Significance for Cultural Resources and the California Environmental Quality Act (CEQA). **DESCRIPTION OF REQUIREMENT:** A County Approved Principal Investigator (PI) known as the "Project Archaeologist," shall be contracted to perform archaeological monitoring and a potential data recovery program during all grading, clearing, grubbing, trenching, and construction activities. The archaeological monitoring program shall include the following:

- a. The Project Archaeologist shall perform the monitoring duties before, during and after construction pursuant to the most current version of the County of San Diego Guidelines for Determining Significance and Report Format and Requirements for Cultural Resources. The Project Archaeologist and Kumeyaay Native American monitor shall also evaluate fill soils to determine that they are clean of cultural resources. The contract or letter of acceptance provided to the County shall include an agreement that the archaeological monitoring will be completed, and a Memorandum of Understanding (MOU) between the Project Archaeologist and the County of San Diego shall be executed. The contract or letter of acceptance shall include a cost estimate for the monitoring work and reporting.
- b. The Project Archeologist shall provide evidence that a Kumeyaay Native American has been contracted to perform Native American Monitoring for the project.
- c. The cost of the monitoring shall be added to the grading bonds or bonded separately.

DOCUMENTATION: The applicant shall provide a copy of the Archaeological Monitoring Contract or letter of acceptance, cost estimate, and MOU to [PDS, PPD]. Additionally, the cost amount of the monitoring work shall be added to the grading bond cost estimate. **TIMING:** Prior to approval of any grading and or improvement plans and issuance of any Grading or Construction Permits. **MONITORING:** [PDS, PPD] shall review the contract or letter of acceptance, MOU and cost estimate or separate bonds for compliance with this condition. The cost estimate should be forwarded to [PDS, PPD] for inclusion in the grading bond cost estimate, and grading bonds and the

grading monitoring requirement shall be made a condition of the issuance of the grading or construction permit.

CULT#2 - CULTURAL RESOURCES TREATMENT AGREEMENT AND PRESERVATION PLAN

INTENT: In order to mitigate for impacts to Traditional Cultural Properties, develop and enter into a Cultural Resources Treatment Agreement and Preservation Plan with a consulting tribe. **DESCRIPTION OF REQUIREMENT:** A Cultural Resources Treatment Agreement and Preservation Plan shall be developed between the applicant or their representative, the County of San Diego, and the consulting tribe. The Cultural Resources Treatment Agreement and Preservation Plan shall be reviewed and agreed to by the County prior to final signature and authorization. The Cultural Resources Treatment Agreement and Preservation Plan shall include but is not limited to the following:

- a. Parties entering into the agreement and contact information.
- b. Responsibilities of the Property Owner or their representative, Principal Investigator, archaeological monitors, Kumeyaay Native American monitors, County, and consulting tribes (Barona, Campo, San Pasqual, and Viejas).
- c. Requirements of the Archaeological Monitoring Program including unanticipated discoveries. The requirements shall address grading and grubbing requirements including controlled grading and controlled vegetation removal in areas of cultural sensitivity, analysis of identified cultural materials, and onsite storage of cultural materials.
- d. Excavated soils. No soils are proposed for export. Consultation with the culturally-affiliated tribes shall occur should excavated soils need to be exported offsite.
- e. Treatment of identified Native American cultural materials.
- f. Treatment of Native American human remains and associated grave goods.
- g. Confidentiality of cultural information including location and data.
- h. Regulations that apply to cultural resources that have been identified or may be identified during project construction.

DOCUMENTATION: A copy of the implemented agreement shall be submitted to the [PDS, PPD] for approval. **TIMING:** Prior to approval of any grading and or improvement plans and issuance of any Grading or Construction Permits. **MONITORING:** The [PDS, PPD] shall review the implemented agreement for compliance this condition.

CULT#3 - CULTURAL RESOURCES MONITORING REPORT

INTENT: In order to ensure that the Archaeological Monitoring occurred during the earth-disturbing activities, a final report shall be prepared. **DESCRIPTION OF REQUIREMENT:** A final Archaeological Monitoring and Data Recovery Report that

documents the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program shall be prepared. The report shall include the following items:

- a. DPR Primary and Archaeological Site forms.
- b. Daily Monitoring Logs
- c. Evidence that all cultural materials collected during the survey, testing, and archaeological monitoring program have been conveyed as follows:

(1) All prehistoric cultural materials shall be curated at a culturally affiliated Tribal curation facility or San Diego curation facility that meets federal standards per 36 CFR Part 79, and, therefore, would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records, including title, shall be transferred to the San Diego curation facility or culturally affiliated Tribal curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the prehistoric archaeological materials have been received and that all fees have been paid.

or

Evidence that all prehistoric materials collected during the archaeological monitoring program have been returned to a Native American group of appropriate tribal affinity. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.

(2) Historic materials shall be curated at a San Diego curation facility as described above and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, including title, shall be transferred to the San Diego curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.

- d. If no cultural resources are discovered, a Negative Monitoring Report must be submitted stating that the grading monitoring activities have been completed. Grading Monitoring Logs must be submitted with the negative monitoring report.

DOCUMENTATION: The applicant's archaeologist shall prepare the final report and submit it to the [PDS, PPD] for approval. Once approved, a final copy of the report shall be submitted to the South Coastal Information Center (SCIC) and any culturally-affiliated Tribe who requests a copy. **TIMING:** Prior to any occupancy, final grading release, or use of the premises in reliance of this permit, the final report shall be prepared. **MONITORING:** The [PDS, PPD] shall review the final report for compliance this condition and the report format guidelines. Upon acceptance of the report, [PDS, PPD] shall inform [PDS, LDR] and [DPW, PDCI], that the requirement is complete, and the bond amount can be relinquished. If the monitoring was bonded separately, then

[PDS, PPD] shall inform [PDS or DPW FISCAL] to release the bond back to the applicant.

CULT#GR-1-ARCHAEOLOGICAL AND TRIBAL MONITORING – PRECONSTRUCTION MEETING

INTENT: In order to comply with the County of San Diego Guidelines for Significance – Cultural Resources, an Archaeological Monitoring Program shall be implemented.

DESCRIPTION OF REQUIREMENT: The County approved Project Archaeologist and Kumeyaay Native American Monitor shall attend the pre-construction meeting with the contractors to explain and coordinate the requirements of the archaeological monitoring program. The Project Archaeologist and Kumeyaay Native American Monitor shall monitor the original cutting of previously undisturbed deposits in all areas identified for development including off-site improvements. The Project Archaeologist and Kumeyaay Native American monitor shall also evaluate fill soils to determine that they are clean of cultural resources. The archaeological monitoring program shall comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources.

DOCUMENTATION: The applicant shall have the contracted Project Archeologist and Kumeyaay Native American attend the preconstruction meeting to explain the monitoring requirements.

TIMING: Prior to any clearing, grubbing, trenching, grading, or any land disturbances this condition shall be completed. **MONITORING:** The [DPW, PDCI] shall confirm the attendance of the approved Project Archaeologist.

CULT#GR-2-ARCHAEOLOGICAL AND TRIBAL MONITORING – DURING CONSTRUCTION

INTENT: In order to comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources, a Cultural Resource Grading Monitoring Program shall be implemented. **DESCRIPTION**

OF REQUIREMENT: The Project Archaeologist and Kumeyaay Native American Monitor shall monitor the original cutting of previously undisturbed deposits in all areas identified for development including off-site improvements. The archaeological monitoring program shall comply with the following requirements during earth-disturbing activities:

- a. **Monitoring.** During the original cutting of previously undisturbed deposits, the Project Archaeologist and Kumeyaay Native American Monitor shall be onsite as determined necessary by the Project Archaeologist. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor. Monitoring of the cutting of previously disturbed deposits will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor.
- b. **Inadvertent Discoveries.** In the event that previously unidentified potentially significant cultural resources are discovered:

1. The Project Archaeologist or the Kumeyaay Native American monitor shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources.
2. At the time of discovery, the Project Archaeologist shall contact the PDS Staff Archaeologist.

Native American Resources

3. The Project Archaeologist, in consultation with the PDS Staff Archaeologist and the Kumeyaay Native American Monitor, shall determine the significance of the discovered resources.
4. Construction activities will be allowed to resume in the affected area only after the PDS Staff Archaeologist has concurred with the evaluation.
5. Isolates and clearly non-significant deposits shall be minimally documented in the field. Should the isolates and/or non-significant deposits not be collected by the Project Archaeologist, then the Kumeyaay Native American monitor may collect the cultural material for transfer to a Tribal Curation facility or repatriation program.
- 6.
7. If cultural resources are identified, one or more of the following treatments, in order of preference, shall be employed:
 - a. Preservation in place (avoidance) of the Native American Resources, if feasible. Preservation in place means avoiding the resources, leaving them in place where they were found with no development affecting the integrity of the resources. Avoidance may include the capping of the resource for its protection.
 - b. Reburial (relocation) of the resources on the project property, if feasible. The measures for reburial shall include, at least, the following:
 - Measures and provisions to protect the future reburial area from any impacts in perpetuity.
 - Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with the exception that sacred items, burial goods, and Native American human remains are excluded.
 - Any reburial process shall be culturally appropriate.
 - Listing of contents and location of the reburial shall be included in the confidential appendix of the Monitoring Report.
 - c. If preservation in place (avoidance) and reburial (relocation) are determined not feasible, and the Native American resource is determined significant, then , a Research Design and Data Recovery Program (Program) shall be prepared by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor. The County Archaeologist shall review and approve the Program, which shall be carried out using professional archaeological methods.

Historic Resources

7. The Project Archaeologist, in consultation with the PDS Staff Archaeologist, shall determine the significance of the discovered resources.

8. Construction activities will be allowed to resume in the affected area only after the PDS Staff Archaeologist has concurred with the evaluation.
9. Isolates and clearly non-significant deposits shall be minimally documented in the field.
10. If cultural resources are determined to be significant, a Research Design and Data Recovery Program (Program) shall be prepared by the Project Archaeologist. The County Archaeologist shall review and approve the Program, which shall be carried out using professional archaeological methods.

c. **Human Remains.** If any human remains are discovered:

1. The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
2. Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Kumeyaay Native American monitor.
3. If the remains are determined to be of Native American origin, the NAHC shall immediately contact the Most Likely Descendant (MLD).
4. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
5. The MLD may with the permission of the landowner, or their authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.
6. Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.

d. **Fill Soils.** The Project Archaeologist and Kumeyaay Native American monitor shall evaluate fill soils to determine that they are clean of cultural resources.

DOCUMENTATION: The applicant shall implement the Archaeological Monitoring Program pursuant to this condition. **TIMING:** The following actions shall occur throughout the duration of the earth disturbing activities. **MONITORING:** The [DPW, PDCI] shall make sure that the Project Archeologist is on-site performing the monitoring duties of this condition. The [DPW, PDCI] shall contact the [PDS, PPD] if the Project Archeologist or applicant fails to comply with this condition.

CULT#GR-3-ARCHAEOLOGICAL AND TRIBAL MONITORING – ROUGH GRADING INTENT: In order to comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources, an Archaeological Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** The Project Archaeologist shall prepare one of the following reports upon completion of the earth-disturbing activities that require monitoring:

- a. **No Archaeological Resources Encountered.** If no archaeological resources are encountered during earth-disturbing activities, then submit a final Negative Monitoring Report substantiating that earth-disturbing activities are completed, and no cultural resources were encountered. Archaeological monitoring logs showing the date and time that the monitor was on site and any comments from the Native American Monitor must be included in the Negative Monitoring Report.
- b. **Archaeological Resources Encountered.** If archaeological resources were encountered during the earth disturbing activities, the Project Archaeologist shall provide an Archaeological Monitoring Report stating that the field monitoring activities have been completed, and that resources have been encountered. The report shall detail all cultural artifacts and deposits discovered during monitoring and the anticipated time schedule for completion of the curation and/or repatriation phase of the monitoring.

DOCUMENTATION: The applicant shall submit the Archaeological Monitoring Report to *[PDS, PPD]* for review and approval. Once approved, a final copy of the report shall be submitted to the South Coastal Information Center and any culturally-affiliated Tribe who requests a copy. **TIMING:** Upon completion of all earth-disturbing activities, and prior to Rough Grading Final Inspection (Grading Ordinance SEC 87.421.a.2), the report shall be completed. **MONITORING:** *[PDS, PPD]* shall review the report or field monitoring memo for compliance with the project MMRP, and inform *[DPW, PDCI]* that the requirement is completed.

CULT#GR-4 - ARCHAEOLOGICAL AND TRIBAL MONITORING – FINAL GRADING

INTENT: In order to comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources, an Archaeological Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** The Project Archaeologist shall prepare a final report that documents the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program if cultural resources were encountered during earth-disturbing activities. The report shall include the following, if applicable:

- a. Department of Parks and Recreation Primary and Archaeological Site forms.
- b. Daily Monitoring Logs
- c. Evidence that all cultural materials have been conveyed as follows:
 - (1) Evidence that all prehistoric materials collected during the archaeological monitoring program have been submitted to a culturally affiliated Native American Tribal curation facility or San Diego curation facility a that meets federal standards per 36 CFR Part 79, and, therefore, would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records, including title, shall be transferred to the San Diego curation facility or culturally affiliated Native American Tribal curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation

facility stating that the prehistoric archaeological materials have been received and that all fees have been paid.

or

Evidence that all prehistoric materials collected during the grading monitoring program have been repatriated to a Native American group of appropriate tribal affinity and shall be accompanied by payment of the fees necessary, if required. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.

(2) Historic materials shall be curated at a San Diego curation facility and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, including title, shall be transferred to the San Diego curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.

d. If no cultural resources are discovered, a Negative Monitoring Report must be submitted stating that the archaeological monitoring activities have been completed. Grading Monitoring Logs must be submitted with the negative monitoring report.

DOCUMENTATION: The applicant's archaeologist shall prepare the final report and submit it to [PDS, PPD] for approval. Once approved, a final copy of the report shall be submitted to the South Coastal Information Center (SCIC) and any culturally-affiliated Tribe who requests a copy. **TIMING:** Prior to any occupancy, final grading release, or use of the premises in reliance of this permit, the final report shall be prepared. **MONITORING:** [PDS, PPD] shall review the final report for compliance with this condition and the report format guidelines. Upon acceptance of the report, [PDS, PPD] shall inform [PDS, LDR] and [DPW, PDCI], that the requirement is complete and the bond amount can be relinquished. If the monitoring was bonded separately, then [PDS, PPD] shall inform [PDS or DPW FISCAL] to release the bond back to the applicant.

PALEO#GR-1-PALEONTOLOGICAL MONITORING

INTENT: In order to comply with the San Diego County Guidelines for Determining Significance for Paleontological Resources, a Paleontological Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** This project site has marginal levels of sensitive Paleontological resources. All grading activities are subject to the County of San Diego Grading Ordinance Section 87.430, if any significant resources (Fossils) are encountered during grading activities.

a. The grading contractor is responsible to monitor for paleontological resources during all grading activities. If any fossils are found greater than 12 inches in any dimension, stop all grading activities and contact PDS before continuing grading operations.

- b. If any paleontological resources are discovered and salvaged, the monitoring, recovery, and subsequent work determined necessary shall be completed by or under the supervision of a Qualified Paleontologist pursuant to the San Diego County Guidelines for Determining Significance for Paleontological Resources.

TIMING: The following actions shall occur throughout the duration of the grading construction. **MONITORING:** The [DPW, PDC] shall make sure that the grading contractor is on-site performing the Monitoring duties of this condition. The [DPW, PDC] shall contact PDS if the grading contractor or applicant fails to comply with this condition.

PALEO#GR-2 - PALEONTOLOGICAL MONITORING

INTENT: In order to comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Paleontological Resources, a Paleontological Monitoring Program shall be implemented.

DESCRIPTION OF REQUIREMENT: One of the following letters shall be performed upon completion of the grading activities that require monitoring:

- a. If no paleontological resources were discovered, submit a “No Fossils Found” letter from the grading contractor to PDS stating that the monitoring has been completed and that no fossils were discovered, and including the names and signatures from the fossil monitors. The letter shall be in the format of Attachment E of the County of San Diego Guidelines for Determining Significance for Paleontological Resources.
- b. If paleontological resources were encountered during grading, a letter shall be prepared stating that the field grading monitoring activities have been completed, and that resources have been encountered. The letter shall detail the anticipated time schedule for completion of the curation phase of the monitoring.

DOCUMENTATION: The applicant shall submit the letter report to PDS for review and approval. **TIMING:** Upon completion of all grading activities, and prior to Rough Grading Final Inspection (Grading Ordinance SEC 87.421.a.2), the letter report shall be completed. **MONITORING:** PDS shall review the final negative letter report or field monitoring memo for compliance with the project MMRP, and inform [DPW, PDC] that the requirement is completed.

BIO#1-RESOURCE AVOIDANCE [PDS, FEE X2]

INTENT: In order to avoid impacts to migratory birds, which are a sensitive biological resource pursuant to Migratory Bird Treaty Act (MBTA), a Resource Avoidance Area (RAA), shall be implemented on all plans. **DESCRIPTION OF REQUIREMENT:** There shall be no brushing, clearing and/or grading such that none will be allowed within 300 feet of migratory bird nesting habitat during the breeding season of the migratory bird within RAA as indicated on these plans. The breeding season is defined as occurring between February 15 and August 15. The Director of PDS [PDS, PCC] may waive this condition, through written concurrence from the US Fish and Wildlife Service and the California Department of Fish and Wildlife, provided that no migratory birds are present in the vicinity of the brushing, clearing, or grading as demonstrated by a survey completed no more than 72-hours prior to the start of brushing, clearing, or grading. **DOCUMENTATION:** The applicant shall provide a letter of agreement with this

condition; alternatively, the applicant may submit a written request for waiver of this condition. Although, no grading shall occur within the RAA until concurrence is received from the County and the Wildlife Agencies. **TIMING:** Prior to preconstruction conference and prior to any clearing, grubbing, trenching, grading, or any land disturbances and throughout the duration of the grading and construction, compliance with this condition is mandatory unless the requirement is waived by the County upon receipt of concurrence from the Wildlife Agencies. **MONITORING:** The [DPW, PDCI] shall not allow any grading in the RAA during the specified dates, unless a concurrence from the [PDS, PCC] is received. The [PDS, PCC] shall review the concurrence letter.

AQ#1-CONSTRUCTION ARCHITECTURAL COATINGS

INTENT: In order to reduce emissions of volatile organic compounds (VOC).

DESCRIPTION OF REQUIREMENT: According to SDAPCD Rule 67.0.1, the project shall use architectural coatings with a VOC content of 100 grams per liter (g/L) or less for exterior coatings and 50 g/L or less for interior coatings. **DOCUMENTATION:** The applicant shall comply with the Air Quality requirements of this condition. **TIMING:** The following action shall occur throughout the duration of the construction activities involving the application of architectural coatings. **MONITORING:** The [DLPU, BI] shall make sure that the construction contractor complies with the Air Quality requirement of this condition. The [DLPU, BI] shall contact the [PDS, PCC] if the applicant fails to comply with this condition.

AQ-#2-FUGITIVE DUST

INTENT: In order to mitigate for fugitive dust during construction activities.

DESCRIPTION OF REQUIREMENT: The project applicant or designee shall comply with the San Diego County Air Pollution Control District (SDAPCD) Rule 55 and County Code Section 87.428 (Grading Ordinance), and implement the following dust control measures during construction:

- a. Maintain at least 12 inches of freeboard, cover loads, or secure material by watering or treating in all haul/dump trucks entering or leaving the site with soil import/export material.
- b. Water construction areas between dozer/scrapper passes and on any unpaved roads within the project limits a minimum of two (2) times daily.
- c. Terminate grading activities in winds in excess of 25 miles per hour (mph).
- d. Use sweepers and water trucks to control dust and debris at public street access points and approach routes to construction sites.
- e. Stabilize dirt storage piles with chemical binders, tarps, fencing, or other suppression measures.
- f. Stabilize internal construction-roadways by paving, chip sealing or chemicals after rough grading.
- g. Enforce a 15-mph speed limit on unpaved surfaces.
- h. Hydroseed, landscape, or develop disturbed areas as quickly as possible and as directed by the County and/or SDAPCD to reduce dust generation.
- i. Visible roadway dust as a result of active operations, spillage from transport trucks, erosion, or track-out/carry-out shall be minimized by the use of track-out grates, gravel beds, or wheel-washing at each egress point and be removed at the conclusion of each workday when active operations cease, or every 24 hours for

continuous operations. If a street sweeper is used to remove any trackout/ carry-out, only respirable particulate matter (PM10) -efficient street sweepers certified to meet the most current South Coast Air Quality Management District (SCAQMD) Rule 1186 requirements shall be used. The use of blowers for removal of track-out/carry-out is prohibited under any circumstances.

DOCUMENTATION: The applicant or designee shall comply with the Air Quality requirements of this condition. **TIMING:** The following actions shall occur throughout the duration of construction and grading. **MONITORING:** The [DPW, PDCI] shall make sure that the grading contractor complies with the Air Quality requirements of this condition. The [DPW, PDCI] shall contact the [PDS, PCC] if the applicant fails to comply with this Condition.

GHG#1–SUSTAINABLE DESIGN FEATURES

INTENT: In order to promote project sustainability. **DESCRIPTION OF REQUIREMENT:** The project shall install the following sustainable design features or comply with relevant regulations:

- a. Install low-flow plumbing fixtures in compliance with CALGreen, which requires a 20 percent increase in indoor water use efficiency and use of indoor water-efficient irrigation systems.
- b. Install a high-reflectivity cool roof.
- c. Provide four Electric Vehicle (EV) spaces as shown on the Plot Plan.
- d. Install high-efficiency LED lighting to achieve reduction in overall lighting energy.
- e. Incorporate photovoltaic (PV) provisions consistent with the requirements for residential land uses.

DOCUMENTATION: The applicant shall comply with the requirements of this condition. **TIMING:** Prior to approval of any building plan or the issuance of any building permit, these design measures shall be implemented on the building plans and landscape plans. **MONITORING:** The [PDS, BPPR] shall verify that the building plans comply with the conditions.

ADOPTION STATEMENT: This Negative Declaration was adopted and above California Environmental Quality Act findings made by the:

County of San Diego Planning Commission

on February 28, 2025

Daniella Hofreiter, Planning Manager
Project Planning Division



County of San Diego

VINCE NICOLETTI
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 210, SAN DIEGO, CA 92123
(858) 505-6445 General • (858) 694-2705 Code Compliance
(858) 565-5920 Building Services

December 12, 2024

CEQA Initial Study - Environmental Checklist Form (Based on the State CEQA Guidelines, Appendix G)

1. Title; Project Number(s); Environmental Log Number:

Bradley Court Convalescent Center Major Use Permit Modification; PDS2021-MUP-85-053W2

2. Lead agency name and address:

County of San Diego, Planning & Development Services (PDS)
5510 Overland Avenue, Suite 110
San Diego, CA 92123-1239

3. a. Contact: Daniella Hofreiter, Planning Manager
b. Phone number: (619) 629-4431
c. E-mail: DaniellaT.Hofreiter@sdcounty.ca.gov.

4. Project location:

The Bradley Court Convalescent Center Expansion Project (project) is located on 3.4 acres at 675 East Bradley Avenue in the Lakeside Community Plan Area within unincorporated San Diego County (Assessor's Parcel Number 387-142-36-00).

5. Project Applicant name and address:

Mr. Thomas Jurbala
El Cajon Real Estate, LLC
6 Hutton Centre Drive, Suite 400
Santa Ana, CA 92707
ThomasJurbala@LifeGen.com

6. General Plan

Community Plan: Lakeside

Regional Category: Village

Land Use Designation: Village Residential (VR-24)

Density: -
Floor Area Ratio (FAR) -

- 7. Zoning
 - Use Regulation: Residential – Urban (RU)
 - Minimum Lot Size: 6,000 square feet
 - Special Area Regulation: C

8. Description of project:

A Major Use Permit Modification is required for the proposed project. The project involves expanding the existing Bradley Court Convalescent Center to construct a new 25,515 square-foot assisted living building with 66 resident beds, and a new 10,613 square foot 31-bed skilled nursing building, for a total of 97 new beds. The total project site would include four buildings with 87 skilled nursing beds and 66 transitional care beds, for a total of 153 beds. The existing residential building would be converted to a controlled access building.

New sewer, domestic water, and fire water (including one additional fire hydrant) would be provided with the sitework. Two trash enclosures for refuse and recycled goods would be provided. Along with new landscaping throughout the facility, site lighting would be installed to provide a minimum of 1.0 FC of lighting along all egress paths to the public way.

The site currently takes access from Bradley Avenue, a County maintained road, via a single full access driveway on the west side of the Project site. This driveway is proposed to be relocated eastward to be more centered to the project site. The proposed project would include a new fire lane access road allowing access to the rear of existing Building 2 and the new Building 3. A new driveway approach along Bradley Avenue would be placed for full fire truck access. The existing parking area would be redesigned to accommodate the proposed buildings and provide 73 parking spaces, including 3 electric vehicle (EV) charging spaces. Access would continue to be provided off East Bradley Avenue.

The Transitional Care Building, located on the northern portion of the site, would be served by packaged terminal air conditioning (PTAC) units and split systems. The Skilled Nursing Building, located on the southern portion of the site, would be served by rooftop heating, ventilation, and air conditioning (HVAC) units. The project would include a 150-kW generator with enclosure to the southeast location of the existing generator, which would be removed. The project would also include a can wash; no mechanical equipment would be associated with the can wash.

The project would be served by Padre Dam Municipal Water District for sewer and with imported water from Helix Water District. Fire service would be provided by the San Miguel Fire Protection District.

Project construction would begin in April 2025 and be completed by June 2026. The proposed development would require site preparation and grading. An estimated 4,279

cubic yards of soil would be cut and recompacted on site. An additional estimated 4,909 cubic yards of fill would be imported to the project site. Staging would occur at the perimeter of the new buildings and the north court 'green' space of the existing building. The project is assumed to be operational in 2026.

The site is subject to the Lakeside Community Design Review, and the General Plan Category Village, Land Use Designation Village Residential (VR-24). Zoning for the site is Urban Residential (RU) with special designator "C". Access would continue to be provided off of East Bradley Avenue.

9. Surrounding land uses and setting (Briefly describe the project’s surroundings):

The project is located in the Lakeside Community Plan Area within unincorporated San Diego County, immediately southwest of the City of El Cajon border. The project site is bounded by East Bradley Avenue to the north, North Mollison Avenue and Greenfield Drive to the east and south, and Sams Hill Road to the west. The project site is in a developed area with mobile home residences (RMH9) across East Bradley Avenue to the north; multi-family residences (RU and RV) to the east, south, and west; and commercial uses (C32) to the east and west.

The project site has a gentle rising slope from north to south, rising from an elevation of approximately 442 feet at the northern portion of the entrance to approximately 470 feet at the southern portion of the site. The project site is located approximately 0.4 mile east of State Route 67.

10. Other permits and public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

Permit Type/Action	Agency
Air Quality Permit to Construct	Air Pollution Control District (APCD)
County Right-of-Way Permits Construction Permit	County of San Diego
Fire District Approval	San Miguel Fire Protection District
General Construction Storm water Permit	RWQCB
Grading Permit	County of San Diego
Improvement Plans	County of San Diego
Landscape Plans	County of San Diego
Sewer District Approval	Padre Dam Municipal Water District
Site Plan	County of San Diego
Water District Approval	Helix Water District

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, has consultation begun?

YES

NO



Note: Conducting consultation early in the California Environmental Quality Act (CEQA) process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and to reduce the potential for delay and conflict in the environmental review process (see Public Resources Code §21083.3.2). Information is also available from the Native American Heritage Commission's Sacred Lands File per Public Resources Code §5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code §21082.3(e) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project and involve at least one impact that is a "Potentially Significant Impact" or a "Less Than Significant With Mitigation Incorporated," as indicated by the checklist on the following pages.

- | | | |
|---|--|--|
| <input type="checkbox"/> <u>Aesthetics</u> | <input type="checkbox"/> <u>Agriculture and Forestry Resources</u> | <input type="checkbox"/> <u>Air Quality</u> |
| <input checked="" type="checkbox"/> <u>Biological Resources</u> | <input checked="" type="checkbox"/> <u>Cultural Resources</u> | <input type="checkbox"/> <u>Energy</u> |
| <input type="checkbox"/> <u>Geology & Soils</u> | <input type="checkbox"/> <u>Greenhouse Gas Emissions</u> | <input checked="" type="checkbox"/> <u>Hazards & Hazardous Materials</u> |
| <input type="checkbox"/> <u>Hydrology & Water Quality</u> | <input type="checkbox"/> <u>Land Use & Planning</u> | <input type="checkbox"/> <u>Mineral Resources</u> |
| <input checked="" type="checkbox"/> <u>Noise</u> | <input type="checkbox"/> <u>Population & Housing</u> | <input type="checkbox"/> <u>Public Services</u> |
| <input type="checkbox"/> <u>Recreation</u> | <input type="checkbox"/> <u>Transportation</u> | <input type="checkbox"/> <u>Tribal Cultural Resources</u> |
| <input type="checkbox"/> <u>Utilities & Service Systems</u> | <input type="checkbox"/> <u>Wildfire</u> | <input type="checkbox"/> <u>Mandatory Findings of Significance</u> |

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- On the basis of this Initial Study, PDS finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- On the basis of this Initial Study, PDS finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- On the basis of this Initial Study, PDS finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Signature

December 12, 2024

Date

Daniella Hofreiter

Printed Name

Planning Manager

Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, Less Than Significant With Mitigation Incorporated, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance

I. AESTHETICS.

Except as provided in Public Resources Code §21099.

a) Would the project have a substantial adverse effect on a scenic vista?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: A vista is a view from a particular location or composite views along a roadway or trail. Scenic vistas often refer to views of natural lands, but may also be compositions of natural and developed areas, or even entirely of developed and unnatural areas, such as a scenic vista of a rural town and surrounding agricultural lands. What is scenic to one person may not be scenic to another, so the assessment of what constitutes a scenic vista must consider the perceptions of a variety of viewer groups.

The items that can be seen within a vista are visual resources. Adverse impacts to individual visual resources or the addition of structures or developed areas may or may not adversely affect the vista. Determining the level of impact to a scenic vista requires analyzing the changes to the vista as a whole and also to individual visual resources.

Less Than Significant Impact: As described in the General Plan Update (GPU) Environmental Impact Report (EIR; County of San Diego 2011), the County contains visual resources affording opportunities for scenic vistas in every community. Resource Conservation Areas (RCAs) are identified within the GPU EIR and are the closest that the County comes to specifically designating scenic vistas. Many public roads in the County currently have views of RCAs or expanses of natural resources that would have the potential to be considered scenic vistas. Numerous public trails are also available throughout the County. New development can often have the potential to obstruct, interrupt, or detract from a scenic vista.

The project includes development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building in the unincorporated community of Lakeside. Surrounding land uses consist of mobile home residences across East Bradley Avenue to the north; multi-family residences to the east, south, and west; and commercial uses to the east and west. Sky Ranch Park is the nearest open space area to the project site, located approximately 0.62-mile northeast within the City of Santee. Other RCAs identified within the Lakeside Community Plan are located more than 4 miles away from the project site, including Sycamore Canyon (#56 of the Lakeside Community Plan), San Vicente Reservoir (#57 of the Lakeside Community Plan), and El Captain Reservoir (#58 of the Lakeside Community Plan). Due to distance and intervening highways, structures, and topography, no impacts would occur to these RCAs. Additionally, given the urban environment surrounding the project site, the proposed project would not substantially degrade a scenic vista. Therefore, the project would have a less than significant effect on a scenic vista.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

- Potentially Significant Impact
- Less than Significant Impact
- Less Than Significant With Mitigation Incorporated
- No Impact

Discussion/Explanation: State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic (Caltrans - California Scenic Highway Program). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist’s line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway.

Less than Significant Impact: The project site is not located near or visible within the composite viewshed of a State scenic highway and will not damage or remove visual resources within a State scenic highway. The nearest designated State scenic highway is a portion of SR-125 located over 4 miles southwest of the project site. The project is located approximately 1 mile north of I-8 and approximately 1.1 miles southeast of the terminus of SR-52, both of which are identified as eligible for designation as a State Scenic Highway. I-8 is also listed as a Scenic Highway in the County’s Conservation and Open Space Element of the General Plan. Due to distance, topography, and intervening structures, the project site is not visible from these highways. As such, the project site is not visible within the composite viewshed of a State scenic highway or County Scenic Corridor and will not damage or remove visual resources within a State scenic highway or County Scenic Corridor. Therefore, impacts would be less than significant.

- c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

- Potentially Significant Impact
- Less than Significant Impact
- Less Than Significant With Mitigation Incorporated
- No Impact

Discussion/Explanation: Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity, and continuity. Visual quality is the viewer’s perception of the visual environment and varies based on exposure, sensitivity, and expectation of the viewers.

Less Than Significant Impact: The project site is located in an urbanized area and is surrounded by mobile home residences across East Bradley Avenue to the north; multi-family residences to the east, south, and west; and commercial uses to the east and west. The project includes development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building on an existing developed site, which is consistent with the Urban Residential land use and zoning designations for the project site. The project would be required to include preparation of Landscape Plans pursuant to the

County’s Water Efficient Landscape Design Manual and Water Conservation in Landscaping Ordinance. The project would also be in conformance with the County’s Parking Design Manual, Grading Ordinance, and the Lakeside Design Guidelines, the requirements of the C Designator for the Gillespie Airport Land Use Compatibility Plan Area. Therefore, the project would not conflict with applicable zoning and other regulations governing scenic quality.

d) Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The project is located within Zone B as identified by the San Diego County Light Pollution Code. Zone B is any area of the unincorporated County that is not within 15 miles from the Mount Palomar or Mount Laguna observatory. The project would not adversely affect nighttime views or astronomical observations because the project would conform to the County’s Light Pollution Code (Section 51.201-51.209). The Lighting Plan prepared for the project shows that the proposed lighting would not result in light pollution outside of the project site. Therefore, the project would not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area.

II. AGRICULTURE AND FORESTRY RESOURCES.

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide or local Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to non-agricultural use?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The project site does not contain any agricultural resources, lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, no agricultural resources including Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance would be converted to a non-agricultural use.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The project site is not zoned for agricultural use, nor is the land is not under a Williamson Act Contract. Therefore, the project does not conflict with existing zoning for agricultural use, or a Williamson Act Contract.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), or timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

No Impact: The project site does not contain forest lands or timberland. The County of San Diego does not have any existing Timberland Production Zones. In addition, the project is consistent with existing zoning, and a rezone is not proposed. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland production zones.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

No Impact: The project site does not contain any forest lands as defined in Public Resources Code § 12220(g); therefore, project implementation would not result in the loss or conversion of forest land to a non-forest use. In addition, the project is not located in the vicinity of offsite forest resources.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use or conversion of forest land to non-forest use?

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

No Impact: The project site and surrounding area within a radius of 0.25-mile does not contain any active agricultural operations or lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, no Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance, or active agricultural operations would be converted to a non-agricultural use by the proposed project.

III. AIR QUALITY.

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

- a) Would the project conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: An Air Quality Report was prepared for the project by Rincon Consultants, Inc. (Rincon Consultants) dated September 17, 2024 (see Appendix A). The following responses have incorporated the analysis from the report.

Less Than Significant Impact: The regional air quality standards (RAQS) and State Implementation Plan (SIP) rely on the San Diego Association of Government's (SANDAG's) growth projections, which are developed based on proposed buildout of land uses identified in the County's General Plan. Because the RAQS and SIP project future air quality conditions based on growth projections assuming buildout of the County's General Plan, it is assumed that a project involving development that is consistent with the growth anticipated by the County's General Plan are consistent with the RAQS and SIP. According to the 2022 RAQS, mobile sources are the largest contributor to air quality emissions, specifically emissions generated from operations of typical residential and commercial developments, and therefore, can be used to define project intensity (i.e., less mobile emissions results in less land use intensity).

The proposed project would add 97 additional bedrooms for assisted living in the Lakeside Community Planning Area. The proposed project would be consistent with the General Plan land uses and SANDAG growth projections. Residents of the proposed project are expected to be existing residents in the region that would be relocated to the site; therefore, the project would not conflict with the region's future employment and housing needs. This project is not a transportation project that would affect the region's transportation systems and should not increase transportation demands within the local area. Therefore, the project would not induce substantial population and would not conflict with or obstruct implementation of the RAQS and SIP. In addition, the construction and operational emissions from the project are anticipated to be below established screening-level thresholds (SLTs), as addressed under Section III(b), and would not violate any ambient air quality standards.

- b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: The San Diego APCD does not provide quantitative thresholds for determining the significance of construction or mobile source-related impacts. However, the San

Diego APCD does specify Air Quality Impact Analysis (AQIA) trigger levels for new or modified stationary sources (APCD Rules 20.2 and 20.3). If these incremental levels for stationary sources are exceeded, an AQIA must be performed for the proposed new or modified source. Although these trigger levels do not generally apply to mobile sources or general land development projects, for comparative purposes these levels may be used to evaluate the increased emissions which would be discharged to the San Diego Air Basin from proposed land development projects. For projects whose stationary-source emissions are below these criteria, no AQIA is typically required, and project level emissions are presumed to be less than significant.

For CEQA purposes, these SLTs can be used to demonstrate that a project's total emissions would not result in a significant impact to air quality. The daily SLTs are most appropriately used for the standard construction and operational emissions. When project emissions have the potential to approach or exceed the SLTs listed below in Table 1, additional air quality modeling may need to be prepared to demonstrate that ground level concentrations resulting from project emissions (with background levels) will be below National and California Ambient Air Quality Standard (NAAQS and CAAQS, respectively).

APCD Rules 20.2 and 20.3 do not have AQIA thresholds for emissions of volatile organic compounds (VOCs) and PM_{2.5}. The use of the screening level for VOCs specified by the South Coast Air Quality Management District (SCAQMD), which generally has stricter emissions thresholds than San Diego's APCD, is recommended for evaluating projects in San Diego County. For PM_{2.5}, the EPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005, which quantifies significant emissions as 10 tons per year, will be used as the screening-level criteria as shown in Table 1 below:

Table 1. San Diego County Screening-Level Thresholds for Air Quality Impact Analysis

Pollutant	Total Emissions		
	Lbs. per Hour	Lbs. per Day	Tons per Year
Respirable Particulate Matter (PM ₁₀)	---	100	15
Fine Particulate Matter (PM _{2.5})	--- *	55	10*
Nitrogen Oxides (NO _x)	25	250	40
Sulfur Oxides (SO _x)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead	---	3.2	0.6
Volatile Organic Compounds (VOCs)	---	75**	13.7***

Notes: * EPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005. Also used by the SCAQMD.

** Threshold for VOCs based on the threshold of significance for VOCs from the SCAQMD for the Coachella Valley.

*** 13.7 Tons Per Year threshold based on 75 lbs/day multiplied by 365 days/year and divided by 2,000 lbs/ton.

Less Than Significant Impact: Currently, San Diego County is in "non-attainment" status for the NAAQS and CAAQS federal and state Ozone (O₃) and state Particulate Matter less than or equal to 10 microns and less than or equal to 2.5 microns (PM₁₀ and PM_{2.5}). O₃ is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil);

solvents; petroleum processing and storage; and pesticides. Sources of PM₁₀ in both urban and rural areas include the following: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

The project would contribute to construction and operational sources of criteria pollutant air emissions. An analysis of estimated construction and operational emissions was completed using SCAQMD's California Emissions Estimator Model (CalEEMod).

Project construction is estimated to take 14 months. On-site emissions are attributed to emissions occurring within the project area, such as the activity of construction equipment. Off-site emissions related to the project include vendor, hauling, and worker vehicle trips to and from the project site. Emissions of VOCs, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} would not exceed the County's SLTs during project construction, assuming adherence to applicable regulatory requirements, such as site watering during construction activities as required by the County grading permit and the use of low-VOC paint (50 g/L for flat coatings and 100 g/L for traffic marking coating) as required by SDAPCD Rule 67.0.1. Therefore, project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment (O₃, PM₁₀, and PM_{2.5}) under an applicable federal or state ambient air quality standard. The project's air quality emissions would not exceed the County's SLTs; therefore, as the thresholds were developed to protect the public health that align with ambient air quality standards, air quality impacts on public health would be less than significant, and no mitigation measures would be necessary (see Table 2 below and Appendix A).

Table 2. Estimated Project Construction-Related Air Emissions

Pollutant	Maximum Project Emissions (Lbs. per Day)	Screening-Level Thresholds (Lbs. per Day)	Above Threshold?
Respirable Particulate Matter (PM ₁₀)	31	100	No
Fine Particulate Matter (PM _{2.5})	17	55	No
Nitrogen Oxides (NO _x)	58	250	No
Sulfur Oxides (SO _x)	<1	250	No
Carbon Monoxide (CO)	46	550	No
Volatile Organic Compounds (VOCs)	12	75	No

Note: CalEEMod does not report on lead emissions and therefore, it is not included in this analysis.

During operation, the project is expected to result in 263 average daily trips (see Section XVII. *Transportation*). Operation of the project would generate criteria air pollutant emissions associated with area sources (e.g., architectural coatings, consumer products, and landscaping equipment), energy sources (i.e., use of natural gas for space and water heating), and mobile sources (i.e., vehicle trips to and from the project site). Criteria air pollutant emissions generated during the operation of project would not exceed San Diego County SLTs for VOCs, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}. Therefore, project operation would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard. Air quality impacts would be less than significant, and no mitigation measures would be necessary (see Table 3 below and Appendix A).

Table 3. Estimated Project Operational Air Emissions

Pollutant	Maximum Project Emissions (Lbs. per Day)	Screening-Level Thresholds (Lbs. per Day)	Above Threshold?
Respirable Particulate Matter (PM ₁₀)	2	100	No
Fine Particulate Matter (PM _{2.5})	<1	55	No
Nitrogen Oxides (NO _x)	1	250	No
Sulfur Oxides (SO _x)	<1	250	No
Carbon Monoxide (CO)	15	550	No
Volatile Organic Compounds (VOCs)	2	75	No

Note: CalEEMod does not report on lead emissions and therefore, it is not included in this analysis.

Cumulative impacts could occur if the most intensive phases of construction for the proposed Project occur simultaneously with intensive phases of other construction projects in close proximity. The most intensive construction phase for the Project and for typical developments occurs during earthwork and grading activities. During these phases, the primary criteria air pollutant of concern would be PM₁₀. The project’s estimated emissions of criteria air pollutants, specifically PM₁₀, were estimated to be 31 lb/day, which is under the County’s SLTs of 100 lb/day during construction activities. In addition, due to the highly dispersive nature of PM, a cumulative impact during construction activities would only occur if a project adjacent to the proposed project undergoes simultaneous grading/earthwork activities and emits significantly greater PM₁₀ emissions than the project. Because all projects developed within the County would be required to comply with the County Grading Ordinance and SDAPCD Rule 55, this scenario is not anticipated to occur.

The project is proposing development that is consistent with the County’s General Plan; thus, operational air emissions are considered to have been accounted for in the General Plan Update EIR. The RAQS and SIP were prepared consistent with growth forecasts in the General Plan. Thus, the project would not result in a cumulatively considerable net increase in criteria air pollutants for which the region is currently in non-attainment.

c) Expose sensitive receptors to substantial pollutant concentrations?

- Potentially Significant Impact
- Less than Significant Impact
- Less Than Significant With Mitigation Incorporated
- No Impact

Discussion/Explanation: Air quality regulators typically define sensitive receptors as schools (Preschool – 12th Grade), hospitals, resident care facilities, day-care centers, residences, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality.

Less Than Significant Impact: The nearest sensitive receptors to the project site are mobile home residences approximately 125 feet to the north and the multi-family residences approximately 15 to 65 feet to the east, south, and west. The project would generate construction emissions in the vicinity of sensitive receptors.

Carbon Monoxide Hotspot Analysis

As previously discussed, carbon monoxide is a colorless, odorless, poisonous gas that may be found in high concentrations near areas of high traffic volumes. CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. The SDAB is in attainment of State and federal CO standards. The SDAPCD measured a maximum 8-hour CO concentration of 1.4 parts per million (ppm) in 2020 (SDAPCD 2021). CO concentrations were well below the federal standard 8-hour standard of 9 ppm.

A CO hotspot analysis is required by the County if a proposed development would cause road intersections to operate at or below a LOS E with intersection peak-hour trips exceeding 3,000 trips. The traffic study prepared for the project studies three intersections in the vicinity of the project site (Appendix I). The project would add 263 daily trips (which includes all project generated trips, including trucks), which include 19 AM peak hour and 26 PM peak hour trips. Subsequent to the completion of the traffic study, the project size was reduced from 101 to 97 additional beds. Therefore, the analysis in this report reflects the 101 additional beds, which results in a conservative analysis.

The additional traffic generated during project operation would not cause intersections in the vicinity of the project site to operate at or below LOS E. The traffic study concluded that the proposed project would not result in any significant intersection impacts (Appendix I). Therefore, a CO hotspot analysis is not required for the proposed project and project-generated trips would not result in, or substantially contribute to, CO concentrations that exceed the eight-hour ambient air quality standards along area roadways and intersections.

Toxic Air Contaminants (TACs)

Construction-related activities would result in short-term, project-generated emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation grading, building construction, and other construction activities. DPM was identified as a toxic air contaminant (TAC) by CARB in 1998. The potential cancer risk from the inhalation of DPM (discussed in the following paragraphs) outweighs the potential non-cancer health impacts and is therefore the focus of this discussion (CARB 2017).

Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the proposed project would occur over approximately 14 months. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the California Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments (HRA), which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period (assumed to be the approximate time that a person spends at a single household location). OEHHA recommends this risk be bracketed with nine-year and 70-year exposure periods and that HRA should be limited to the period/duration of activities associated with the project (OEHHA 2015).

The maximum on-site PM_{2.5} emissions, which are used to represent DPM emissions for this analysis, would occur during site preparation and grading activities. While site preparation and grading emissions represent the worst-case condition, such activities would only occur for approximately two months, which represents less than one percent of the typical health risk calculation periods of 9 years, 30 years, and 70 years. PM_{2.5} emissions would decrease for the remaining construction period because construction activities such as building construction and paving would require less construction equipment. Therefore, given the aforementioned, DPM generated by project construction is not expected to create conditions where the probability that the Maximally Exposed Individual would contract cancer is greater than ten in one million or to generate ground-level concentrations of non-carcinogenic TACs that exceed a Hazard Index greater than one for the Maximally Exposed Individual.

Lastly, mobile emissions during project operations would primarily be composed of passenger and light-duty vehicles (55.4 percent) and light trucks (6.3 percent) accessing the proposed buildings and parking lot, as shown in Table 9 below. Approximately one percent of the vehicles visiting the project site would be heavy trucks according to CalEEMod, which takes fuel and consumer goods delivery trucks into account. Delivery truck trips would be made to the project site based on a schedule, and additional heavy-duty trucks driven by project customers may occur as well. However, the project is designed to primarily serve customers in light autos and trucks. The project would not attract a substantial number of trips from large or heavy-duty vehicles that could generate mobile diesel emissions due to the passenger vehicle-serving nature of the proposed use.

The proposed project would have a 150-kilowatt diesel generator on-site, which would be permitted by the SDAPCD. The on-site generator would comply with SDAPCD guidelines and would be tested and maintained 52 hours per year and would be required by the permit to be below health risk thresholds. Additionally, the proposed project land use type is not typical of a TAC emitter and would not constitute a cancer risk to sensitive receivers. Therefore, construction and operation of the proposed buildings and parking lot would not generate significant amounts of TACs that would adversely impact sensitive receptors in the vicinity of the project site.

As discussed in Section III(b), the proposed project would not result in construction or operational emissions that would exceed the County's SLTs for health risk. Thus, neither construction nor operation of the project would expose sensitive receptors to an incremental health risk.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: SDAPCD Rule 51, commonly referred to as the public nuisance rule, prohibits emissions from any source whatsoever in such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to the public health or damage to property. The potential for an operation to result in odor complaints from a "considerable" number of persons in the area would be considered a significant, adverse odor impact.

The project would involve the temporary use of diesel-powered construction equipment, which would generate exhaust that may be noticeable for short durations at adjacent properties. However, construction activities would be temporary, and construction emissions would not exceed San Diego County SLTs.

The land use and industrial operations typically associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, refineries, landfills, dairies, and fiberglass molding. The proposed operations of the buildings and parking lot are not typically associated with objectionable odors.

The sensitive receivers nearest to the project site are the mobile home residences approximately 125 feet to the north, and the multi-family residences approximately 15 to 65 feet to the east, south, and west. It is unlikely that the odors from the proposed project would be distinguishable from existing sources, given the vehicle emissions associated with adjacent roadways and State Route 67 in the vicinity of the project site. Furthermore, odors generated from proposed uses would dissipate and be reduced with increasing distance from the project site. Therefore, the project would not generate objectionable odors.

IV. BIOLOGICAL RESOURCES.

- a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife, or CDFW, or U.S. Fish and Wildlife Service?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: A Biological Resources Letter Report was prepared for the project by Rincon Consultants, dated September 2024 (Appendix B). Due to the limited biological resources on site, extensive surrounding development, and absence of native vegetation communities, wetlands, and sensitive species, a full Biological Resources Report was not warranted. The Biological Resources Letter Report consists of a literature review and results of a field reconnaissance survey conducted on November 11, 2021. The following responses have incorporated the analysis from the report.

Less than Significant with Mitigation Incorporated: The Biological Resources Letter Report determined that the project site consists of urban/developed land and disturbed habitat. The project site contains 1.36 acres of urban/developed land cover including the special care facility, the driveway off Bradley Avenue, and the parking lot. Some of the observed ornamental vegetation during the site survey included Brazilian pepper (*Schinus terebinthifolius*), fan palm (*Washingtonia* sp.), queen palm (*Syagrus romanzoffiana*), blue jacaranda (*Jacaranda mimosifolia*), and Canary Island pine (*Pinus canariensis*). Disturbed habitat and urban/developed land cover are classified as Multiple Species Conservation Program (MSCP) Tier IV habitat (considered as being the least sensitive tier) and are not considered sensitive by state or federal agencies. Approximately 2.11 acres of disturbed habitat occur on site. Some

disturbed habitat species from the field survey included Russian thistle (*Salsola tragus*), iceplant (*Carpobrotus edulis*), ripgut brome (*Bromus diandrus*), black mustard (*Brassica nigra*), and slender wild oat (*Avena barbata*). The field survey conducted for the Biological Resources Letter Report identified sparsely scattered elements of Diegan coastal sage scrub species; however, these species were not expansive or dominant enough to constitute a distinct vegetation community within the project site. Individual species such as coyote brush (*Baccharis pilularis*), mulefat (*Baccharis salicifolia*), coast live oak (*Quercus agrifolia*), wild cucumber (*Marah macrocarpa*), and coast prickly pear (*Opuntia littoralis*) were found in the along the eastern and southeast edges of the site, within disturbed habitat and bare ground, abutting urban/developed areas.

The project site contains habitat for wildlife species that commonly occur within urban areas, including house finch (*Haemorhous mexicanus*), American crow (*Corvus brachyrhynchos*), Anna's hummingbird (*Calypte anna*), and yellow-rumped warbler (*Setophaga coronata*). Small rodent burrows were also observed along the north, east, and southeast edges/berms of the project site; mammal species were not visually observed. Large mammals such as mule deer (*Odocoileus hemionus*) are not expected to utilize or move through the project site due to the urbanized condition of the project site.

The CNDDDB results include 30 special-status plant species within five miles of the project site. The IPaC results include six federally listed plant species that are recorded in the vicinity of the project site. No special-status plant species were observed on the project site and the field survey confirmed the absence of suitable habitat for listed special-status plant species identified within the South County MSCP Subarea Plan (County of San Diego 2006).

The CNDDDB results include 49 special-status wildlife species within five miles of the project site. The IPaC results include six federally listed wildlife species that are recorded in the vicinity of the project site. The potential for special-status animal species to occur on the project site was assessed based on known distribution, habitat requirements, and existing site conditions. No federal or state listed, or otherwise special-status animal species were observed or are expected to occur within or near the project site due to lack of suitable habitat. Additionally, no County Group 1 and 2, and County List A, B, C, and D animal species are expected to occur within the project site (County of San Diego 2006).

Although various locally common raptors are known to occur in the vicinity of the project area (such as red-tailed hawk [*Buteo jamaicensis*], red-shouldered hawk [*Buteo lineatus*], Cooper's hawk [*Accipiter cooperii*], American kestrel [*Falco sparverius*], and others), these bird species are recognized as tolerant of human presence, and none are listed as Rare, Threatened, or Endangered by either the state or federal governments. No raptors would be dependent on any resources provided solely by the project site. No highly sensitive raptors, such as prairie falcons (*Falco mexicanus*) or golden eagles (*Aquila chrysaetos*), would utilize the project site, given its location, current use, small size, and proximity to existing development. For these reasons, the project site does not constitute high-value raptor foraging or nesting habitat, and the project site does not constitute a significant biological resource with respect to local raptors.

The Quino checkerspot butterfly (*Euphydryas editha quino*) (Quino) is a federally endangered butterfly species native to southern California. Optimal habitat for Quino is characterized by patchy shrub or small tree landscapes with openings of several meters between large plants, or

a landscape of open swales alternating with dense patches of shrubs and appears to contain little or no invasive exotic vegetation (USFWS 2021). Rincon’s biologist did not observe Quino during the field reconnaissance survey and confirmed that the project site does not contain suitable habitat or preferred host plants for this species. Therefore, Quino is not expected to occur on site.

Based on the determinations of the Biological Resources Letter Report, no designated critical habitat for special-status wildlife species exists at the project site. Sensitive biological resources on site include trees and other structures suitable for nesting birds. Given the potential for urban-adapted birds to nest within the ornamental trees and shrubs on-site, MM BIO-1 is recommended to avoid potential impacts to nesting birds from implementation of the project. With implementation of MM BIO-1, project impacts to species identified as a candidate, sensitive, or special status species would be less than significant.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Less than Significant Impact: The project site is located in a highly urbanized setting, as residential and commercial development surrounds the project site. The nearest relatively natural habitat occurs approximately 350 feet southwest of the project site. This relatively natural habitat is comprised of open space but is isolated by surrounding development. The project site does not support any federal or state defined and regulated aquatic features wetlands. Therefore, the project would not have any substantial adverse effect on any riparian habitat, and project impacts to regulated (or non-regulated) aquatic habitat would be less than significant.

c) Would the project have a substantial adverse effect on state or federally protected wetlands defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Less Than Significant Impact: The A Biological Resources Letter Report did not conduct a formal jurisdictional delineation for the project site. Based on the desktop review and field reconnaissance survey, no state or federally defined unvegetated streams, swales, riparian/riverine habitat, wetland vernal pools, or potential vernal pools occur within the project site. The closest mapped feature is a riverine intermittent stream bed that is seasonally flooded. The streambed’s most southern extent is located approximately 0.48 mile north of the project site at the intersection of Pepper Drive and Rockview Drive. The project would not impact by discharging into, directly removing, filling, or hydrologically interrupting, any federally protected wetlands near the project site. The preparation of a Stormwater Pollution Prevention Plan

(SWPPP) and associated best management practices (BMPs) would occur in accordance with the General Construction Permit for stormwater discharges to avoid indirect effects to downstream drainages (see Section X(a)). Additionally, project construction activities would occur in accordance with the County’s Grading Ordinance to avoid erosion and sedimentation impacts on the ephemeral drainages. Therefore, no significant impacts would occur to wetlands or waters of the U.S. as defined by Section 404 of the Clean Water Act and under the jurisdiction of the USACE.

The Project would not impact state or federally protected wetlands and thus, would not contribute to a cumulative impact for such habitats.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The Biological Resources Letter Report determined that the project site is not positioned inside a conservation planning linkage zone; the closest wildlife core linkage is located 23 miles northeast of the project site. The project site is surrounded by suburban homes and commercial development; therefore, the project site does not support any wildlife corridors or linkages. Due to the existing developed nature of the site the proposed project would not contribute to impeding wildlife movement or the use of native wildlife nursery sites. Therefore, no impact would occur.

e) Would the project conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The project site is located in the North Metro-Lakeside-Jamul Segment of the South County MSCP Subarea Plan. This plan does not identify the project site as being subject to habitat conservation. The proposed expansion of the existing development on the project site would therefore be in compliance with this or any other future habitat conservation plan insofar as all project impacts are mitigated to less than significant levels. Impacts to urban/developed land cover and disturbed habitat vegetation community types that occur within the project site do not have a grouping of ten or more individual plant species and do not require mitigation per the County’s Biological Mitigation Ordinance. The project site does not contain any native or sensitive vegetation communities; therefore, future development at the site is not expected to conflict with the conservation goals of the MSCP, previously defined, nor any other local, regional, or state habitat conservation plan. Therefore, no impact would occur.

Mitigation Measures

BIO-1 Common, urban-adapted birds could potentially nest within the ornamental trees and shrubs on site. Therefore, the following measure is recommended to maintain compliance with the California Fish and Game Code and Migratory Bird Treaty Act with respect to nesting birds:

If initial clearing activities take place between February 15 and August 15, nesting bird surveys are recommended to be performed by a qualified biologist/ornithologist with results reported subsequently to the County prior to grading and clearing. If nesting birds are found, a County-approved construction buffer may be required until all young are determined no longer dependent on the nest.

V. CULTURAL RESOURCES.

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to 15064.5?

- Potentially Significant Impact
- Less than Significant Impact
- Less Than Significant With Mitigation Incorporated
- No Impact

Discussion/Explanation: A Cultural Resources Technical Report was prepared for the project by Rincon Consultants, dated September 2024 (Appendix C). As part of the Cultural Resources Report prepared for the project, a records search, a Sacred Lands File search, and pedestrian field survey of the property were conducted. The following responses have incorporated the analysis from the report.

Less Than Significant Impact: A Cultural Resource Assessment and Historical Evaluation was completed for the proposed project by Rincon Consultants. The project site is located in an area of sensitivity for prehistoric resources; however, no prehistoric resources were identified as part of the pedestrian survey completed for this project. The existing buildings on the project site are not recommended eligible for listing in the National Register of Historic Places or California Register of Historical Resources or for designation to the County of San Diego Historic Register, and therefore are not considered a historical resource as defined by CEQA. Further, the California Historical Resources Information System records search and a review of County of San Diego Historic Register failed to identify any other cultural resources, including historic districts, within close proximity to the project site. Because the resources are not considered significant historic resources pursuant to CEQA Guidelines §15064.5, loss of these resources cannot contribute to a potentially significant impact. Impacts would be less than significant.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

- Potentially Significant Impact
- Less than Significant Impact
- Less Than Significant With Mitigation Incorporated
- No Impact

Less Than Significant with Mitigation Incorporated: Archaeological resources were identified during the Cultural Resource Assessment prepared by Rincon Consultants. The Sacred Lands File search from the Native American Heritage Commission for the project identified 21 previously conducted cultural resources studies within a 0.5-mile radius of the project site, of which one included the entire project site. Additionally, the records search identified 16 previously recorded cultural resources within a 0.5-mile radius of the project site, none of which occur within the project site; however, one prehistoric resource is recorded within approximately 0.2-mile of the project site, and an undocumented prehistoric milling complex immediately southwest of the project site. Additionally, previous cultural resources studies within the vicinity recommend archaeological and Native American monitoring due to the presence of previously recorded resources and general sensitivity of the area. Based on the records search from the Cultural Resource Assessment, the project site is considered to have a moderate sensitivity for archaeological resources. Impacts would be reduced to less than significant with the implementation of MM CUL-1 through MM CUL-4, which would include a worker’s environmental awareness program should be conducted prior to earthmoving activities, archaeological monitoring during ground disturbing activities by a qualified archaeologist, and provisions for unanticipated discoveries of cultural resources during project implementation.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant With Mitigation Incorporated: Based on an analysis of records and a survey of the property by Rincon Consultants, it has been determined that the project is not likely disturb any human remains because the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. In the unlikely event that human remains are encountered onsite during earth-disturbing activities, MM CUL-2 would ensure that state and federal laws and regulations regarding human remains (i.e., Public Resources Code §5097.98, CEQA Guidelines §15064.5 and Health & Safety Code §7050.5) are followed. With implementation of MM CUL-2, potential impacts to disturbance of human remains would be less than significant.

Mitigation Measures

CUL-1 Prior to any clearing, grubbing, trenching, grading, or any land disturbances, the County-approved Project Archaeologist and Kumeyaay Native American Monitor shall attend the pre-construction meeting with the contractors to explain and coordinate the requirements of the archaeological monitoring program. The Project Archaeologist and Kumeyaay Native American Monitor shall monitor the original cutting of previously undisturbed deposits in all areas identified for development including off-site improvements. The Project Archaeologist and Kumeyaay Native American monitor shall also evaluate fill soils to determine that they are clean of cultural resources. The archaeological monitoring program shall comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content

Requirements for Cultural Resources. The applicant shall have the contracted Project Archeologist and Kumeyaay Native American attend the preconstruction meeting to explain the monitoring requirements. The Department of Public Works, Private Development Construction Inspection shall confirm the attendance of the approved Project Archaeologist.

- CUL-2 The Project Archaeologist and Kumeyaay Native American Monitor shall monitor the original cutting of previously undisturbed deposits in all areas identified for development including off-site improvements. The archaeological monitoring program shall comply with the following requirements during earth-disturbing activities:
- a. **Monitoring.** During the original cutting of previously undisturbed deposits, the Project Archaeologist and Kumeyaay Native American Monitor shall be onsite as determined necessary by the Project Archaeologist. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor. Monitoring of the cutting of previously disturbed deposits will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor.
 - b. **Inadvertent Discoveries.** In the event that previously unidentified potentially significant cultural resources are discovered:
 1. The Project Archaeologist or the Kumeyaay Native American monitor shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources.
 2. At the time of discovery, the Project Archaeologist shall contact the PDS Staff Archaeologist.
 3. The Project Archaeologist, in consultation with the PDS Staff Archaeologist and the Kumeyaay Native American Monitor, shall determine the significance of the discovered resources.
 4. Construction activities will be allowed to resume in the affected area only after the PDS Staff Archaeologist has concurred with the evaluation.
 5. Isolates and clearly non-significant deposits shall be minimally documented in the field. Should the isolates and/or non-significant deposits not be collected by the Project Archaeologist, then the Kumeyaay Native American monitor may collect the cultural material for transfer to a Tribal Curation facility or repatriation program.
 6. If cultural resources are determined to be significant, a Research Design and Data Recovery Program (Program) shall be prepared by the Project Archaeologist in consultation with the Kumeyaay Native American Monitor. The County Archaeologist shall review and approve the Program, which shall be carried out using professional archaeological methods. The Program shall include (1) reasonable efforts to preserve (avoidance) "unique" cultural resources or Sacred Sites; (2) the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap, if avoidance is infeasible; and (3) data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).
 - c. **Human Remains.** If any human remains are discovered:

1. The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
 2. Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Kumeyaay Native American monitor.
 3. If the remains are determined to be of Native American origin, the NAHC shall immediately contact the Most Likely Descendant (MLD).
 4. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
 5. The MLD may with the permission of the landowner, or their authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.
 6. Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.
- d. **Fill Soils.** The Project Archaeologist and Kumeyaay Native American monitor shall evaluate fill soils to determine that they are clean of cultural resources.
- e. **Monthly Reporting.** The Project Archaeologist shall submit monthly status reports to the Director of Planning and Development Services starting from the date of the Notice to Proceed to termination of implementation of the archaeological monitoring program. The report shall briefly summarize all activities during the period and the status of progress on overall plan implementation. Upon completion of the implementation phase, a final report shall be submitted describing the plan compliance procedures and site conditions before and after construction.

The Department of Public Works, Private Development Construction Inspection shall make sure that the Project Archeologist is on-site performing the monitoring duties of this condition. The Department of Public Works, Private Development Construction Inspection shall contact the Planning & Development Services, Project Planning Division if the Project Archeologist or applicant fails to comply with this condition.

CUL-3

Upon completion of all earth-disturbing activities, and prior to Rough Grading Final Inspection (Grading Ordinance SEC 87.421.a.2) and issuance of any building permit, the Project Archaeologist shall prepare one of the following reports upon completion of the earth-disturbing activities that require monitoring:

- a. **No Archaeological Resources Encountered.** If no archaeological resources are encountered during earth-disturbing activities, then submit a final Negative Monitoring Report substantiating that earth-disturbing activities are completed and no cultural resources were encountered. Archaeological monitoring logs showing the date and time that the monitor was on site and any comments from the Native American Monitor must be included in the Negative Monitoring Report.

- b. **Archaeological Resources Encountered.** If archaeological resources were encountered during the earth disturbing activities, the Project Archaeologist shall provide an Archaeological Monitoring Report stating that the field monitoring activities have been completed, and that resources have been encountered. The report shall detail all cultural artifacts and deposits discovered during monitoring and the anticipated time schedule for completion of the curation and/or repatriation phase of the monitoring.

The applicant shall submit the Archaeological Monitoring Report to Planning & Development Services, Project Planning Division for review and approval. Once approved, a final copy of the report shall be submitted to the South Coastal Information Center and any culturally affiliated Tribe who requests a copy. Planning & Development Services, Project Planning Division shall review the report or field monitoring memo for compliance with the project MMRP, and inform Department of Public Works, Private Development Construction Inspection that the requirement is completed.

CUL-4

Prior to any occupancy, final grading release, or use of the premises in reliance of this permit, the Project Archaeologist shall prepare a final report that documents the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program if cultural resources were encountered during earth-disturbing activities. The report shall include the following, if applicable:

- a. Department of Parks and Recreation Primary and Archaeological Site forms.
- b. Daily Monitoring Logs
- c. Evidence that all cultural materials have been conveyed as follows:
 1. Evidence that all prehistoric materials collected during the archaeological monitoring program have been submitted to a San Diego curation facility or a culturally affiliated Native American Tribal curation facility that meets federal standards per 36 CFR Part 79, and, therefore, would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records, including title, shall be transferred to the San Diego curation facility or culturally affiliated Native American Tribal curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the prehistoric archaeological materials have been received and that all fees have been paid.
or
Evidence that all prehistoric materials collected during the grading monitoring program have been repatriated to a Native American group of appropriate tribal affinity and shall be accompanied by payment of the fees necessary, if required. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.
 2. Historic materials shall be curated at a San Diego curation facility and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, including title, shall be transferred to the San Diego curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the

curation facility stating that the historic materials have been received and that all fees have been paid.

- d. If no cultural resources are discovered, a Negative Monitoring Report must be submitted stating that the archaeological monitoring activities have been completed. Grading Monitoring Logs must be submitted with the negative monitoring report.

The applicant’s archaeologist shall prepare the final report and submit it to Planning & Development Services, Project Planning Division for approval. Once approved, a final copy of the report shall be submitted to the South Coastal Information Center (SCIC) and any culturally affiliated Tribe who requests a copy. Planning & Development Services, Project Planning Division shall review the final report for compliance with this condition and the report format guidelines. Upon acceptance of the report, Planning & Development Services, Project Planning Division shall inform Planning & Development Services, Land Development Review and Department of Public Works, Private Development Construction Inspection, that the requirement is complete, and the bond amount can be relinquished. If the monitoring was bonded separately, then Planning & Development Services, Project Planning Division shall inform Planning & Development Services or Department of Public Works, Fiscal Services to release the bond back to the applicant.

VI. ENERGY.

- a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The project would result in the use of electricity, natural gas, petroleum, and other consumption of energy resources during both the construction and operation phases of the project; however, the consumption is not expected to be wasteful, inefficient, or unnecessary for the following reasons.

During construction, the project would require the use of heavy construction equipment that would be fueled by gas and diesel. However, the energy use would be temporary, limited, and cease upon completion of construction activities. Construction would be conducted in compliance with local, state, and federal regulations (e.g., United States Environmental Protection Agency [USEPA] and the CARB engine emission standards, which require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption, and limitations on engine idling times). Compliance with these regulations would minimize short-term energy demand during the project’s grading to the extent feasible.

In addition, all new construction would be required to comply with the energy code in effect at the time of construction, which ensures efficient building construction. The project

would also be required to comply with Title 24 energy standards for energy efficiency. Project design features that would result in lower energy use include low-flow plumbing fixtures, a high-reflectivity cool roof, and landscaping with climate adapted plants that require little-to-no water. Additional measures such as efficient water usage, high-efficiency LED street and area lighting, recycling, and composting, would be employed by the project. Additionally, the applicant proposes to install solar photovoltaic (PV) panels, which would minimize the electricity demand from the power grid. Therefore, the construction and operation of the project is not expected to result in the wasteful or inefficient use of energy, and impacts would be less than significant.

The proposed Project would use only the amount of energy necessary for the construction and operation of the proposed 97 skilled nursing and assisted living units that is typical of this type of development. The proposed project would be consistent with the General Plan land uses and SANDAG growth projections. The proposed residences would also include rooftop solar systems to generate renewable energy and energy efficient features as described further in Section VI(b) below. Therefore, the project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The Project would be required to implement renewable energy and energy efficiency measures as required by state law and county sustainability measures, including but not limited to:

- a. Low-flow plumbing fixtures.
- b. A high-reflectivity cool roof.
- c. Incorporation of Title 24 energy standards.
- d. Landscaping in compliance with the County's Water Conservation in Landscaping Ordinance.
- e. Construction and demolition recycling in compliance with County Ordinance Section 68.511 through 68.520 (Diversion of Construction and Demolition Materials from Landfill Disposal).
- f. Composting in compliance with the County's Strategic Plan to Reduce Waste (2017).
- g. High-efficiency LED street and area lighting.
- h. Solar PV provisions consistent with the requirements for residential land uses.
- i. EV charging spaces in compliance with EV requirements in the most recently adopted version of CALGreen.

See Section VIII. Greenhouse Gas Emissions for a detailed list of the project design features that would be incorporated into the project to reduce energy demand. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

VII. GEOLOGY AND SOILS.

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The project site is not located on or in proximity to any known active or potentially active fault traces. Other active fault zones in the region that could possibly affect the project site include the Coronado Bank, San Jacinto, Elsinore and San Andreas Fault Zones (California Department of Conservation 2022). Due to the distance of these faults from the project site, project construction would not result in substantial adverse effects from ground surface rupture at any of these faults. Therefore, impacts would be less than significant.

ii. Strong seismic ground shaking?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: To ensure the structural integrity of the proposed buildings, the project must conform to the Seismic Requirements as outlined within the California Building Code and the County Code. The County Code requires a soils compaction report with proposed foundation recommendations to be approved before the issuance of a building permit. The project grading also must conform to the grading requirements outlined in the County Grading Ordinance and be verified in the field by a licensed or registered Civil Engineer and inspected by County Grading Inspectors. Therefore, compliance with the Grading Plan, Geotechnical Investigation prepared by the registered Civil Engineer, Grading Ordinance, California Building Code, and the County Code would ensure the project would not result in a potentially significant impact from the exposure of people or structures to potential adverse effects from strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: Liquefaction typically occurs when a site is located in a zone with seismic activity, onsite soils are cohesionless (such as sand or gravel), groundwater is encountered within 50 feet of the surface, and soil relative densities are less than about 70 percent. The project site is not within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. This indicates that the liquefaction potential at the site is low. In addition, the site is not underlain by poor artificial fill or located within a floodplain. Therefore, there would be a less than significant impact from the exposure of people or structures to adverse effects from a known area susceptible to ground failure, including liquefaction. In addition, since liquefaction potential at the site is low, earthquake-induced lateral spreading is not considered to be a seismic hazard at the site and impacts would be less than significant.

iv. Landslides?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The project site is not within a low/generally susceptible category "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the San Diego County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) (URS 2004). Landslide risk areas from the MJHMP were based on data including steep slopes (greater than 25 percent); soil series data (SANDAG based on U.S. Geologic Survey [USGS] 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to the western portion of the County) developed by the California Department of Conservation, Division of Mines and Geology (DMG). Also included within Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15 percent in grade because these soils are slide prone. The project site is currently developed and relatively flat. Therefore, the project would have a less than significant impact from the exposure of people or structures to potential adverse effects from landslides.

b) Would the project result in substantial soil erosion or the loss of topsoil?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: According to the Soil Survey of San Diego County, the soils onsite are identified as Placentia sandy loam that have a soil erodibility rating of "moderate" to "severe" as indicated by the Soil Survey for the San Diego Area, prepared by the US Department of Agriculture, Soil Conservation and Forest Service dated December 1973. Construction of the project would include site grading, which has the potential to release sediment into downstream

receiving waters. However, the project would not result in substantial soil erosion or the loss of topsoil for the following reasons:

- The project would not result in unprotected erodible soils.
- The project is not located in a floodplain.
- A Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) and a Hydrology Report dated April 2, 2024 and June 10, 2024, respectively, prepared by Kimley-Horn and Associates, Inc. for the project (see Section X, Hydrology and Water Quality).
- The project would be required to comply with the County's Grading Ordinance [San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE - EROSION PREVENTION) and 87.417 (PLANTING)]. Compliance with these regulations would minimize the potential for water and wind erosion.

Due to these factors, it has been found that the project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

- c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The project proposes the expansion of the existing site with a new assisted living building and skilled nursing building. Grading associated with the project would be required to conform to the grading requirements outlined in the County Grading, Clearing, and Watercourses Ordinance (Grading Ordinance) and be verified in the field by a licensed or registered Civil Engineer and inspected by County Grading Inspectors. Additionally, contaminated soils would be removed from the project site (see Section IX, Hazards and Hazardous Materials), and MM HAZ-2 would require these soils to be replaced by compacted fill in layers to ensure the structural integrity of the proposed structures. In addition, a Soils Engineering Report is required as part of the Building Permit process to assure that the proposed buildings are adequately supported. This Report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the California Building Code. The Report must be approved by the County prior to the issuance of a Building Permit. Therefore, the Grading Plan prepared by the registered Civil Engineer and compliance with the Grading Ordinance and MM HAZ-2 ensure the project would not result in a potentially significant impact related to landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts would be less than significant. For further information regarding landslides, liquefaction, and lateral spreading, refer to Section VII(a)(iii) through (iv) listed above.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: Based on the Preliminary Review of Resources by PDS, the project site is not located within a High Shrink Swell Zone, which would indicate expansive soils. The project site and surrounding areas are currently developed with existing structures. Therefore, the project would not create a substantial risk to life or property and impacts would be less than significant.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The project would rely on public water and sewer for the disposal of wastewater. No septic tanks or alternative wastewater disposal systems are proposed. Therefore, no impact would occur.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: San Diego County has a variety of geologic environments and geologic processes which generally occur in other parts of the state, country, and the world. However, some features stand out as being unique in one way or another within the boundaries of the County.

Less Than Significant Impact: The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features. A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on geological formations that have a low or marginal potential and sensitivity for paleontological resources. Additionally, the project site and surrounding areas have been previously extensively disturbed and are currently developed with existing structures. Therefore, the project is not anticipated to destroy a unique paleontological resource or site or unique geologic feature. Impacts would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS.

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: A Greenhouse Gas Memorandum was prepared for the project by Rincon Consultants, dated November 30, 2024 (Appendix D). The following responses have incorporated the analysis from the report.

Greenhouse gas (GHG) emissions result in an increase in the earth's average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system, known as climate change. These changes are now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels. GHGs include carbon dioxide, methane, halocarbons, and nitrous oxide, among others. Human induced GHG emissions are a result of energy production and consumption and personal vehicle use, among other sources.

Climate changes resulting from GHG emissions could produce an array of adverse environmental impacts including water supply shortages, severe drought, increased flooding, sea level rise, air pollution from increased formation of ground level ozone and particulate matter, ecosystem changes, increased wildfire risk, agricultural impacts, and ocean and terrestrial species impacts, among other adverse effects.

It should be noted that an individual project's GHG emissions would generally not result in direct impacts under CEQA, as the climate change issue is global in nature; however, an individual project could be found to contribute to a potentially significant cumulative impact.

CEQA Guidelines Section 15064.4 recommends that lead agencies quantify GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project, including the extent to which the project may increase or reduce GHG emissions; whether a project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHG emissions.

CEQA Guidelines Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies or suggested by other experts, as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7[c]). The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15064.4[b]).

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem in the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of GHG emissions." Therefore, a lead agency can make a finding of "less than significant" for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions.

The County of San Diego has developed a Climate Action Plan (CAP) to implement climate actions that reduce GHG emissions and establish actions to achieve a goal of net zero carbon emissions by 2045. The CAP establishes emission reduction targets of 43.6 percent emissions reductions below 2019 levels by 2030 and 85.4 percent below 2019 levels by 2045. This CAP sets GHG reduction targets and a net zero goal in alignment with the 2022 Scoping Plan. This CAP's GHG inventory assists in setting the project-specific GHG threshold, described below.

Less Than Significant Impact: A project-specific GHG efficiency threshold can be calculated to represent the rate of emissions reduction necessary for the proposed project to meet the County's 2030 reduction targets. The project is estimated to be operational by 2026. The 2026 GHG emissions target is an efficiency threshold generated by dividing the County of San Diego's GHG emissions target for 2026 by the County's service population projections (residents plus employees) for that year.

Estimated Construction-Related GHG Emissions

Construction of the project would generate temporary GHG emissions primarily from operation of construction equipment onsite, from vehicles transporting construction workers to and from the project site, and heavy trucks to import earth materials onsite. Construction equipment used for site preparation and grading typically generate the greatest amount of construction emissions.

Project construction is estimated to take 14 months. Emissions associated with the construction period were estimated in CalEEMod based on the projected maximum amount of equipment that would be used onsite at any given time during construction activities. Proposed development would require site preparation and grading, building construction, paving, and architectural coating. A total of 4,279 cubic yards of soil would be graded and recompacted on the project site and an additional 4,909 cubic yards of fill would be imported.

The CalEEMod air quality modeling conducted for the project determined that construction of the project is estimated to generate a total of 403 metric tons (MT) of carbon dioxide equivalent

(CO_{2e}). When amortized over a 30-year period¹, construction of the project would generate about 13.4 MT CO_{2e} per year.

Estimated Operational GHG Emissions

CalEEMod calculates operational emissions from the project, which include carbon dioxide (CO₂), nitrogen oxide (N₂O), and methane (CH₄). For mobile sources, CO₂, N₂O, and CH₄ emissions from vehicle trips to and from the site were quantified using CalEEMod. Trip generation rates were sourced from the Transportation Analysis prepared by Linscott, Law & Greenspan, Engineers (Appendix I). The trip generation rates in CalEEMod were adjusted to be consistent with the Transportation Analysis' estimated 263 daily vehicle trips generation. The project would include three parking spaces with EV chargers, which would reduce GHG emissions annually through encouraging the use of EVs over gasoline-powered vehicles. One EV charging station is estimated to reduce approximately 39,125 vehicle miles traveled (VMT) annually. The analysis estimates 72 trees and 264 plants would be implemented throughout the project site and would sequester GHG emissions.

Operation of the proposed project is estimated to generate a total of 253 MT CO_{2e} per year. When combined with the amortized construction emissions (13.4 MT CO_{2e} per year), the total annual emissions associated with the project would be approximately 266.4 MT CO_{2e} or 2.75 MT CO_{2e} per service population per year, which would not exceed the 2026 project-specific efficiency threshold of 3.29 MT CO_{2e} per service population per year. Therefore, impacts would be less than significant.

Additionally, the project would implement the following design features (included as conditions of approval by the County):

1. Low-flow plumbing fixtures, in compliance with CALGreen, which requires a 20 percent increase in indoor water use efficiency and use of indoor water-efficient irrigation systems. A high-reflectivity cool roof. Incorporation of Title 24 energy standards.
2. Landscaping along the frontage of East Bradley Avenue, as well as minor strips of landscaping within the site and boundary.
3. Comply with the County's Water Conservation in Landscaping Ordinance with automatically controlled efficient system and use of native plant species and non-invasive drought tolerant/low water use plants in landscaping plan.
4. Comply with County Ordinance Section 68.511 through 68.520 (Diversion of Construction and Demolition Materials from Landfill Disposal), which requires recycling of 90 percent of inert and 65 percent of all other materials from construction projects.
5. Comply with the County's Strategic Plan to Reduce Waste (2017) through the support of commercial composting programs to reduce organic waste and comply with established waste diversion requirements.
6. Comply with the County's Grading Ordinance and SDAPCD's fugitive dust rules outlined in Section 87.426 of the County's Grading Ordinance.

¹ Consistent with the industry standard and per SCAQMD guidance, total construction GHG emissions resulting from a project were amortized over 30 years and added to operational GHG emissions to account for their contribution to GHG emissions over the lifetime of the project.

7. Utilize architectural coatings compliant with SDAPCD Rule 67.
8. Install high-efficiency LED street and area lighting to achieve reduction in overall lighting energy.
9. The Project would not result in any wasteful, inefficient, or unnecessary energy usage (see Section VI above).
10. The proposed building structures would incorporate photovoltaic (PV) provisions consistent with the requirements for residential land uses.
11. Achieve compliance with EV requirements in the most recently adopted version of CALGreen.
12. The project would have a less-than-significant impact from VMT (see Section XVII below).

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: There are numerous State plans, policies, and regulations adopted to reduce GHG emissions. The principal state plan and policy is Senate Bill (SB) 32 and the California Global Warming Solutions Act of 2006. The quantitative goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. In 2022, the State passed AB 1279, which declares the State would achieve net-zero GHG emissions by 2045 and would reduce GHG emissions by 85 percent below 1990 levels by 2045. Pursuant to the SB 32 goal and AB 1279, the 2022 Scoping Plan was created to outline goals and measures for the State to achieve the reductions. Additionally, SANDAG adopted San Diego Forward: 2021 Regional Plan in 2021, and the County of San Diego General Plan provides goals and policies to reduce GHG emissions. Therefore, the analysis is based upon the project’s consistency with plans and polices adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change, including the CARB 2022 Scoping Plan and SANDAG’s 2021 Regional Plan.

2022 Scoping Plan

The latest iteration of the Scoping Plan is the 2022 Scoping Plan, which focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the state’s long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities. The 2022 Scoping Plan's strategies that apply to the proposed project include the following:

- Reducing fossil fuel use, energy demand and VMT;
- Building decarbonization; and
- Maximizing recycling and diversion from landfills.

The proposed project would be consistent with these goals through project design that would be consistent with latest California 2022 Energy Code. The proposed building structures would incorporate PV provisions consistent with the requirements for residential land uses. In addition, the 2022 CALGreen Standards state five percent of the total number of parking spaces shall be equipped with Level 2 electric vehicle supply equipment, which is approximately three to four

electric chargers. Therefore, the proposed project's three electric chargers would be consistent with the latest CALGreen Standards. The proposed project would be served by San Diego Gas & Electric, which is required to increase its renewable energy procurement in accordance with SB 100 targets. The proposed project is served by San Diego Metropolitan Transit; the project is approximately 120 feet from the nearest transit bus stop, and 0.25 mile from four other bus stops. In addition, the project site is located within 0.5 mile of existing residential and commercial uses, which could encourage alternative modes of transportation such as walking, bicycling, and public transit. In addition, the project would be consistent with the County requirement of recycling 90 percent of inert and 65 percent of all other materials from construction projects, per County Ordinance Section 68.511 through 68.520 (Diversion of Construction and Demolition Materials from Landfill Disposal). Therefore, the proposed project would not conflict with the 2022 Scoping Plan.

San Diego Forward: 2021 Regional Plan

The 2021 Regional Plan provides a framework for meeting goals with coordinated land use and transportation planning strategies. Implementation actions related to projects, policies and programs would confirm SANDAG's commitment to fully realizing the strategies in the 2021 Regional Plan. The Sustainable Communities Strategy (SCS) envisions a transportation system that is fast, fair, and clean, as well as a region that is resilient to economic and environmental changes. The 2021 Regional Plan polices are built around three core strategies:

- Invest In a Reimagined Transportation System. Build a network and fund services that include multimodal roadways; an expanded network of fast, frequent, and low-cost transit; 21st century technology that manages the entire transportation system and connects people to on-demand services; and zero-emissions options for vehicles and micromobility.
- Incentivize Sustainable Growth and Development. Collaborate with local jurisdictions and fund programs to accelerate housing production while also addressing equity, climate resilience, and mobility.
- Implement Innovative Demand and System Management. Reduce solo driving and congestion through increased remote work, carsharing, vanpooling, pricing strategies and parking management programs that leverage partnerships and technology.

The proposed project would add 97 additional bedrooms for assisted living in the Lakeside Community Planning Area. The proposed project would be consistent with the SANDAG growth projections. Residents of the project are expected to be existing residents in the region that would be relocated to the site; therefore, the project would not conflict with the region's future employment and housing needs. This project is not a transportation project that would affect the region's transportation systems and should not increase transportation demands within the local area. The project is approximately 120 feet from the nearest transit bus stop, and 0.25 mile from four other bus stops. Therefore, the project would not induce substantial population and would not conflict with or obstruct implementation of the 2021 Regional Plan.

San Diego County General Plan

The General Plan provides a consistent framework for land use and development decisions consistent with an established community vision. As the equivalent of a local "constitution" for land use and development, the General Plan's diagrams, goals, and policies form the basis for the County's zoning, subdivision, and infrastructure decisions. The General Plan Conservation

and Open Space, and Land Use Element provide the following goals, policies and objectives pertaining to greenhouse gas emissions that are relevant to this analysis:

- COS-14.3: Sustainable Development. Require design of residential subdivisions and nonresidential development through “green” and sustainable land development practices to conserve energy, water, open space, and natural resources.
- COS-15.4: Title 24 Energy Standards. Require development to minimize energy impacts from new buildings in accordance with or exceeding Title 24 energy standards.
- LU-5.1: Reduction of Vehicle Trips within Communities. Incorporate a mixture of uses within Villages and Rural Villages and plan residential densities at a level that support multi-modal transportation, including walking, bicycling, and the use of public transit, when appropriate.

The project would comply with the latest Title 24 Energy Standards that reduces wasteful, expensive, inefficient or unnecessary use of energy. The project would be subject to CALGreen, which requires a 20 percent increase in indoor water use efficiency and use of indoor water-efficient irrigation systems. In addition, the project would be developed approximately 120 feet east of the nearest bus stop, which would provide alternative modes of transportation that could potentially reduce vehicle trips and VMT. Therefore, the project would be consistent with goals and policies in the San Diego County's General Plan to reduce GHG.

Conclusion

A project-specific efficiency threshold was calculated to represent the rate of emissions reduction necessary for the proposed project to meet the County’s reduction targets. GHG emissions from project construction and operations would generate 266 MT CO₂e per year or 2.75 MT CO₂e per service population per year, which would be below the 2026 project-specific GHG efficiency threshold of 3.29 MT CO₂e. In addition, the proposed project would comply with the plans, policies, regulations, and GHG reduction actions/strategies outlined in the 2022 Scoping Plan, 2021 Regional Plan, and the San Diego County General Plan. The project would be consistent with the 2021 Regional Plan since the anticipated residents would be located within the region and would not increase population growth and housing needs. Consistency with the plans, policies, regulations, and GHG reduction actions/strategies would reduce the project’s incremental contribution of GHG emissions. Therefore, the proposed project’s GHG impacts would be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS.

a) Would the project create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: A Phase I Environmental Site Assessment was prepared for the project by GeoSoils, Inc. (GSI) dated June 9, 2021 (see Appendix E). The following responses have incorporated the analysis from the report.

Less Than Significant Impact: Project construction would involve the transport of gasoline and other petroleum-based products associated with construction equipment. These materials are considered hazardous as they could cause temporary localized soil and water contamination. Incidents of spills or other localized contamination could occur during refueling, operation of machinery, undetected fluid leaks, or mechanical failure. However, all storage, handling, and disposal of these materials are regulated by California Department of Toxic Substances Control, the USEPA, and the San Miguel Fire Protection District. All construction activities involving the transportation, usage, and disposal of hazardous materials would be subject to all applicable federal, state, and local requirements, which would reduce impacts associated with the use and handling of hazardous materials during construction to less than significant. Operationally, the project would involve the transport, use, and storage of gasoline and diesel fuel. However, the project will not result in a significant hazard to the public or environment because all storage, handling, transport, emission and disposal of hazardous substances will be in full compliance with local, State, and Federal regulations. California Government Code § 65850.2 requires that no final certificate of occupancy or its substantial equivalent be issued unless there is verification that the owner or authorized agent has met, or is meeting, the applicable requirements of the Health and Safety Code, Division 20, Chapter 6.95, Article 2, Section 25500-25520.

Given the age of the existing structures on-site, it is possible that Asbestos Containing Materials (ACM) and Lead Based Paint (LBP) are present (Appendix E). Lead is a highly toxic metal that was used up until 1978 in paint used on walls, woodwork, siding, windows, and doors. Lead-containing materials shall be managed by applicable regulations including, at a minimum, the hazardous waste disposal requirements (Title 22 California Code of Regulations [CCR] Division 4.5, the worker health and safety requirements (Title 8 CCR §1532.1), and the State Lead Accreditation, Certification, and Work Practice Requirements (Title 17 CCR Division 1, Chapter 8). Asbestos was used extensively from the 1940's until the late 1970's in the construction industry for fireproofing, thermal and acoustic insulation, condensation control, and decoration. The USEPA has determined that there is no "safe" exposure level to asbestos. It is, therefore, highly regulated by the USEPA, the California Environmental Protection Agency (CalEPA), and the California Division of Occupational Safety and Health (CalOSHA). Demolition or renovation operations that involve ACMs must conform to SDAPCD Rules 361.140-361.156. However, the project would not demolish or renovate the existing on-site buildings. Therefore, the proposed project would not create a significant hazard to the public or the environment through the disturbance of ACM or LBP.

Therefore, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

b) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input checked="" type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant with Mitigation: There is one school within 0.25-mile of the project site, Magnolia Elementary School. The project site is located approximately 938 feet (approximately 0.18 mile) northeast from the nearest corner of the school. As described further in Section IX(c), some residual contamination remains in the subsurface at the project site from a previous release of gasoline at the adjoining property (Price Management). In addition, two drums that formerly contained purged groundwater, with petroleum product, still exist on-site. However, a Soil Management Plan specifying the handling of contaminated soil if encountered during excavation and grading activities would be required under MM HAZ-1, to protect human health and the environment. Further, the two drums that exist on-site would be evaluated by an environmental consultant and properly disposed, in accordance with state and local criteria, as required by HAZ-2. The transport and handling of minor amounts of hazardous materials during construction and operation would comply with all applicable federal, state, and local regulations that control hazardous material handling (refer to Section IX(a)). Therefore, with implementation of HAZ-1 and HAZ-2, the project would not have a substantial adverse effect on an existing or proposed school.

- c) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant with Mitigation: The Phase I ESA prepared for the project determined the adjoining property to the east of the project site, Price Management, had a release of gasoline which migrated onto the project site. Although the case received regulatory closure in 2014, some residual contamination remains in the subsurface at the project site and regulatory limitations and requirements may exist for site redevelopment. In addition, two drums that formerly contained purged groundwater, with petroleum product, still exist on-site. A Vapor Encroachment Survey was performed as part of the Phase I ESA to evaluate the potential for soil vapors encroachment on the project site from potential risk sites near the project site. The following properties were identified as potential vapor encroachment concerns:

- Price Management
- Bradley Wash and Gas

A Soil Management Plan specifying the handling of contaminated soil if encountered during excavation and grading activities would be required under MM HAZ-1, to protect human health and the environment. Further, the two drums that exist on-site would be evaluated by an environmental consultant and properly disposed, in accordance with state and local criteria, as required by HAZ-2. The transport and handling of minor amounts of hazardous materials during construction and operation would comply with all applicable federal, state, and local regulations that control hazardous material handling (refer to Section IX(a)). Therefore, with implementation of HAZ-1 and HAZ-2, the Project would not create a significant hazard to the public or environment.

d) Would the project for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Less than Significant Impact: The proposed project is located within Zone 6 (Traffic Pattern Zone) of the Gillespie Field Airport Land Use Compatibility Plan (ALUCP), as well as the Airport Overflight Notification Area and the Airport Influence Area (Review Area 1). Gillespie Field in El Cajon is located approximately 0.8-mile northwest of the project site. However, the project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport. Therefore, the project would not constitute a safety hazard for people residing or working in the project area.

e) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

The following sections summarize the Project’s consistency with applicable emergency response plans or emergency evacuation plans.

i. OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

Less Than Significant Impact: The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives and actions for each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas. The project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN

No Impact: The San Diego County Nuclear Power Station Emergency Response Plan would not be interfered with by the project due to the location of the project, plant, and the specific requirements

of the plan. The emergency plan for the San Onofre Nuclear Generating Station includes an emergency planning zone within a 10-mile radius. All land area within 10 miles of the plant is not within the jurisdiction of the unincorporated County and as such a project in the unincorporated area is not expected to interfere with any response or evacuation.

iii. OIL SPILL CONTINGENCY ELEMENT

No Impact: The Oil Spill Contingency Element would not be interfered with because the project is not located along the coastal zone or coastline.

iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN

No Impact: The Emergency Water Contingencies Annex and Energy Shortage Response Plan would not be interfered with because the project does not propose altering major water or energy supply infrastructure, such as the California Aqueduct.

v. DAM EVACUATION PLAN

No Impact: The Dam Evacuation Plan would not be interfered with because the project is not located within a dam inundation zone.

f) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The project is not located within the Wildland-Urban Interface Zone or a very high fire hazard severity zone (FHSZ). As such, the project is not required to prepare a Fire Protection Plan (FPP). The Building Plan for the project is required to be reviewed and approved by the County Fire Authority and as such, would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code (see Section XX, Wildfire). Based on review of the project by County staff, and through compliance with the County Fire Code and Consolidated Fire Code, impacts would be less than significant.

g) Would the project propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The project does not involve or support uses that allow water to stand for a period of 72 hours (3 days) or more (e.g., artificial lakes, agricultural irrigation ponds). Also, the project does not involve or support uses that would produce or collect animal waste, such as equestrian facilities, agricultural operations (e.g., chicken coops, dairies, etc.), solid waste facility or other similar uses. Therefore, the project would not substantially increase current or future resident's exposure to vectors, including mosquitoes, rats, or flies.

Mitigation Measures

HAZ-1 In order to remediate impacts associate with petroleum hydrocarbons in the soil, as identified in Phase I Environmental Site Assessment (ESA) prepared by Rincon Consultants, dated June 9, 2021 or other contaminated soils discovered during grading or construction, remediation under the supervision of the County DEH, Site Assessment and Mitigation Program (SAM) is required prior to approval of any grading and/or improvement plans. The excavated soil should be stockpiled, tested, characterized for disposal, and transported off-site to an appropriate disposal facility.

For soil testing, a signed, stamped addendum to the Phase I ESA shall be prepared by a Registered Engineer or Professional Geologist. The addendum shall include the following information or as modified by County DEH:

- a. Documentation that the soil sampling occurred between 6 inches to 2-3 feet in depth.
- b. Findings which identify whether onsite soils in this location exceed regulatory screening levels for soil vapors, petroleum, heavy metals, or other contaminants.
- c. If contaminated soils are detected, provide a copy of the contract and a signed sealed statement from the Registered Engineer or Professional Geologist, which states that they will implement the work plan approved by SAM. Grading required to implement the site remediation activities is permitted.

For remediation, a California Licensed Environmental Consultant company shall prepare a Soil Management Plan (SMP), for the remediation of hazardous materials as identified above. The plan shall be prepared and implemented pursuant to the County DEH SAM Manual under direction from the County DEH SAM. As part of the SMP, the following measures shall be implemented:

- a. The applicant shall contract with a California Licensed Environmental Consultant to prepare the SMP and implement any required work plan for soil remediation.
- b. All required grading work shall comply with the County of San Diego Grading Ordinance 87.101 et. al. If a grading permit is required for the remediation work, it shall be issued for the remediation work only.
- c. The County DEH SAM or RWQCB shall oversee the progress of the remediation project.
- d. Upon completion of the soil remediation, a "Closure Letter" from County DEH SAM or RWQCB shall be submitted to the PDS Project Planning Division (PPD) for approval. The PDS PPD shall review the closure letter for compliance with this condition.

- e. Once contaminated soils are removed, these soils shall be replaced by compacted fill in layers to ensure the structural integrity of the proposed buildings.
- f. If the Director of PDS determines the remediation work will take an enormous amount of time that would be detrimental to ultimate project implementation, approval of other engineering plans and/or issuance of other project permits may be permitted as long as there is no risk of effects to public health and safety. Concurrence from the County DEH SAM or RWQCB is required, and the applicant shall enter into a secured agreement for the completion of the remediation work.
- g. Prior to the preconstruction meeting for the project, the following Grading and or Improvement Plan Notes shall be placed on the Preliminary Grading Plan and made conditions of the issuance of said permits:

In the event that any activity, including earthmoving or construction, discovers the presence of contaminated soils on-site, the contractor and/or property owner shall notify County PDS and DEH. The presence of contaminated soils will require soil testing and remediation in accordance with standard County procedures. This process will be determined once the County is notified of the presence of contaminated soils.

HAZ-2 Prior to the preconstruction meeting for the project, the two existing drums on-site, formerly containing groundwater with petroleum products, shall be evaluated by a California Licensed Environmental Consultant and properly disposed, in accordance with state and local requirements.

X. HYDROLOGY AND WATER QUALITY.

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: The following technical studies have been prepared for the project:

- PDP SWQMP prepared by Kimley-Horn and Associates, Inc., dated April 2, 2024 (Appendix F).
- Hydrology Report prepared by Kimley-Horn and Associates, Inc., dated June 10, 2024 (Appendix G).

The following responses have incorporated the analyses from these studies.

Less Than Significant Impact: Potential sources of water pollution would include construction phase disturbance of the soils through grading, materials delivery, and waste generation, and post-construction residential development, including impervious surfaces, landscaped areas (fertilizers/pesticides), pet waste, trash storage, and motor vehicles. However, as described in the PDP SWQMP for the proposed project prepared by Kimley-Horn and Associates, Inc., dated April 2, 2024 (Appendix F), the project is required to obtain a waste discharge identification

number and a NPDES General Construction Permit for stormwater discharges from the State Water Resources Control Board (Region 9). The General Construction Permit for requires preparation and implementation of a SWPPP and associated BMPs. As noted in the PDP SWQMP for the proposed project, construction BMPs would include hydraulic stabilization hydroseeding in the summer, an erosion control blanket in the winter, energy dissipator outlet protection, silt fencing, gravel and sand bags, storm drain inlet protection, an engineered desilting basin (sized for a 10-year flow), a stabilized construction entrance, construction road stabilization, an entrance/exit inspection and cleaning facility with a tire wash, street sweeping and vacuuming, materials management, and waste management.

The project would be consistent with requirements of the County of San Diego BMP Design Manual, which is a design manual for compliance with local County of San Diego Watershed Protection Ordinance (Sections 67.801 et seq.) and regional Municipal Separate Storm Sewer System (MS4) Permit (Regional Water Quality Control Board [RWQCB], San Diego Region Order No. R9-2013-0001 as amended by R9-2015-0001 and R9-2015-0100) requirements for stormwater management.

Additionally, the PDP SWQMP prepared for the project includes several long-term operational BMPs that would prevent degradation of surface or groundwater quality, including site design (landscaping and maintenance of common area and slopes with native or drought-tolerant species, dedication of open space outside of the development footprint), source control (storm drain stenciling/signage, protect trash storage areas, and others), directing runoff to pervious areas, and structural controls including biofiltration basins.

Given that the project would incrementally increase the area of impervious surfaces onsite, and includes construction and long-term operational BMPs, the project would have less than significant impacts on water quality standards and discharge requirements, as well as degradation of surface and groundwater quality in general.

- b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The project lies in the El Cajon Hydrologic Sub Area of the Lower San Diego Hydrologic Area of the San Diego Hydrologic Unit (907.13). The nearest impaired waterbody as listed on the Clean Water Act Section 303(d) list is Forester Creek approximately 1.15 miles south and 1.5 miles west of the project site. According to the Clean Water Act Section 303(d) list, the Forester Creek in hydrologic subarea 907.14 is impaired for benthic community effects, chloride, indicator bacteria, nitrogen, dissolved oxygen, phosphorus, selenium, total dissolved solids, and turbidity. Lake Jennings, Los Coches Creek, and the San Diego River (Lower) are also near the project site approximately 4.15 miles northeast, 2.5 miles north/northeast, and 2 miles north of the project site, respectively. According to the Hydrology and Hydraulics Report prepared for the project by H Kimley-Horn and Associates, Inc., dated June 10, 2024 (Appendix G), drainage from the project site is tributary to a public storm drain

system that discharges to the San Diego River. Specifically, the property drains primarily by overland flow to two existing curb inlets located near the northeast corner of the site and northwest of the site along East Bradley Avenue.

The PDP SWQMP prepared for the project includes design measures and source control BMPs such that potential pollutants would be reduced to the maximum extent practicable so as not to increase the level of pollutants in receiving waters and reduce impacts on stormwater quality and hydromodification to less than significant levels during construction (e.g., hydraulic stabilization hydroseeding in the summer, an erosion control blanket in the winter, energy dissipator outlet protection, silt fencing, gravel and sand bags, storm drain inlet protection, an engineered desilting basin [sized for a 10-year flow], a stabilized construction entrance, construction road stabilization, an entrance/exit inspection and cleaning facility with a tire wash, street sweeping and vacuuming, materials management, and waste management). As part of this project, associated improvements would include three bio-filtration basins. Once of these would be used only for pollution control and flow control, while the other two would be used for pollution control and hydromodification control. The BMPs are consistent with the regional surface water and stormwater planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the project would not contribute to a cumulative impact to an already impaired water body, as listed on the Clean Water Act Section 303(d). Regional surface water and stormwater permitting regulation for County of San Diego includes the following: RWQCB, San Diego Region Order No. R9-2013-0001 as amended by R9-2015-0001 and R9-2015-0100; County Watershed Protection Ordinance (WPO; Sections 67.801 et seq.); County Stormwater Management, and Discharge Control Ordinance; and County Stormwater Standards Manual. The stated purposes of these ordinances are to protect the health, safety and general welfare of the County of San Diego residents; to protect water resources and to improve water quality; to cause the use of management practices by the County and its citizens that would reduce the adverse effects of polluted runoff discharges on waters of the state; to secure benefits from the use of storm water as a resource; and to ensure the County is compliant with applicable state and federal laws. The WPO has discharge prohibitions, and requirements that vary depending on type of land use activity and location in the County. Each project subject to WPO is required to prepare a Stormwater Management Plan that details a project's pollutant discharge contribution to a given watershed and propose BMPs or design measures to mitigate any impacts that may occur in the watershed.

The project would implement construction and operational BMPs to protect water quality as established in the PDP SWQMP prepared for the project and described above in Section X(a). The proposed BMPs are consistent with regional surface water and stormwater planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the project would not contribute to a cumulative impact to an already impaired water body, as listed on the Clean Water Act Section 303(d).

c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?

Potentially Significant Impact

Less than Significant Impact

- Less Than Significant With Mitigation Incorporated No Impact

Less Than Significant Impact: The RWQCB has designated water quality objectives for waters of the San Diego Region to protect the existing and potential beneficial uses of each hydrologic unit. The project lies in the El Cajon Hydrologic Sub Area of the Lower San Diego Hydrologic Area of the San Diego Hydrologic Unit (907.13) that has the following existing beneficial uses for groundwater: municipal and domestic supply, industrial service supply, contact water recreation, non-contact water recreation, warm freshwater habitat, and wildlife habitat (State Water Resources Control Board 2021).

Potential sources of polluted runoff resulting from the project are discussed in the PDP SWQMP prepared for the project. As described in Section X(a) and (b) above, a number of construction and operational BMPs would be employed to reduce potential pollutants in runoff to the maximum extent practicable, such that the project would not cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. The proposed BMPs are consistent with regional surface water and stormwater planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the project would not contribute to a cumulatively considerable exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses.

d) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

- Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Less Than Significant Impact: The project would obtain its water supply from the Helix Water District that obtains water from surface reservoirs or other imported water source. Limited water would be required during the construction phase for dust control and suppression and the project would not use any groundwater during construction or operation phases of the project.

In addition, the project would result in an incremental increase in impervious surfaces, which would not interfere with regional groundwater recharge, and would include landscaping bordering the paved surfaces which would allow for infiltration. The project would not involve regional diversion of water to another groundwater basin, or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining or culverts, for substantial distances (e.g., 0.25-mile). Therefore, impacts would be less than significant.

e) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surface, in a manner which would:

- (i) result in substantial erosion or siltation on- or off-site;

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The project proposes to create new impervious surfaces on the project site. As part of this project, associated improvements would include three bio-filtration basins. Once of these would be used only for pollution control and flow control, while the other two would be used for pollution control and hydromodification control. First flush runoff from the site would be treated in the biofiltration basins and piped via a proposed 18-inch storm drain to the existing 66-inch pipe along East Bradley Avenue to prevent scouring and erosion.

The project would implement construction and operational BMPs to protect water quality as established in the PDP SWQMP prepared for the project and described above in Section X(a) and (b). Several of these BMPs are intended to reduce erosion and siltation to the maximum extent feasible. In addition, as shown in Table 1 of the Hydrology Report prepared by Kimley-Horn and Associates, Inc., dated June 10, 2024 (Appendix G), the 100-year peak flow from the project site would be reduced following development of the site. Drainage patterns and basin areas would not be substantially altered by the project as shown in Table 1 of the Drainage Study. Therefore, the project would not result in substantial erosion or siltation on- or offsite.

- (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: Please refer to Section X(e)(i). The proposed project would not significantly alter established drainage patterns or significantly increase the amount of runoff. As shown in Table 1 of the Hydrology Report prepared by Kimley-Horn and Associates, Inc., dated June 10, 2024 (Appendix G), the 100-year peak flow from the project site would be reduced following development of the site, and drainage patterns and basin areas would not be substantially altered. Therefore, the project would have a less than significant impact with respect to increasing the rate or amount of surface runoff in a manner which would result in flooding on- or offsite.

- (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The project would implement construction and operational BMPs to protect water quality as established in the PDP SWQMP prepared for the project and described above in Section X(a) and (b) and would have a less than significant impact with

regard to substantial additional sources of polluted runoff. As described in Section X(e)(i) above, the project would not significantly alter established drainage patterns and would actually reduce the amount of runoff from the project site (Appendix G). Therefore, the project would have a less than significant impact with respect to creating or contributing runoff water that would exceed the capacity of existing or planned stormwater drainage systems.

(iv) impede or redirect flood flows?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant: Please see Section X(e)(i) through (iii). The Hydrology Report prepared by Kimley-Horn and Associates, Inc., dated June 10, 2024 (Appendix G) demonstrates that the Project would not impede or redirect flood flows.

f) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The proposed site lies within a Flood Zone "X" as designated by FEMA, which defines the area determined to be outside the 500-year flood and protected by levee from 100-year flood. Therefore, the project site is not located in a flood hazard zone. Additionally, the project site is located outside of a tsunami or seiche zone given its distance from a lake or the coast. Therefore, no impact would occur.

g) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The project site would be in compliance with the San Diego Basin Water Quality Control Plan and is not located within a County Sustainable Groundwater Management Act or Groundwater Sustainability Plan basin area. See Section X(a) through (d). The project would implement construction and operational BMPs established in the PDP SWQMP prepared for the project to protect water quality. As a result, the project would not contribute to a direct or cumulatively considerable exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. As described in Section X(d) above, the project would not use any groundwater for any purpose, including irrigation, domestic or commercial demands. In addition, the project does not involve operations that would interfere substantially with groundwater recharge. The project would be required to implement the PDP SWQMP, prepare and implement a SWPPP, and be in compliance with the

County’s WPO. Therefore, the project would have a less than significant impact with regard to implementation of the Basin Plan or a sustainable groundwater management plan.

XI. LAND USE AND PLANNING.

a) Would the project physically divide an established community?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The project proposes the development additional buildings on a currently developed site. No component of the project would introduce a barrier or division to, or otherwise result in a conflict with, the surrounding residential, commercial, or industrial development or other established community. Because the project site’s expansion exists within existing project boundaries, the proposed project would not significantly disrupt or divide the established community.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The project includes development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square-foot 31-bed skilled nursing building in the unincorporated community of Lakeside, which is consistent with the Village Residential (VR-24) and Residential – Urban (RU) land use and zoning designations for the project site. Surrounding land uses consist of mobile home residences across East Bradley Avenue to the north; multi-family residences to the east, south, and west; and commercial uses to the east and west. The project does not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts would be less than significant.

XII. MINERAL RESOURCES.

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The project site is not classified by the California Department of Conservation – Division of Mines and Geology as an area of “Potential Mineral Resource

Significance.” The project site is surrounded by developed residential land uses which would be incompatible with future extraction of mineral resources on the project site. A future mining operation at the project site would create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Additionally, the project site is less than four acres in size. Therefore, implementation of the project would not result in the loss of availability of a known mineral resource that would be of value since the mineral resource extraction would not occur at the site due to incompatible land uses.

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The project site is not located in a Mineral Resource Zone, nor is it located within 1,300 feet of such lands. Therefore, the project would not result in the loss of availability of locally important mineral resource(s). Therefore, no potentially significant loss of availability of a locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan, or other land use plan would occur as a result of this project.

XIII. NOISE.

a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: A Noise Report was prepared for the project by Rincon Consultants dated September 17, 2024 (see Appendix H). The following responses have incorporated the analysis from the report.

Less Than Significant With Mitigation Incorporated: The project would include construction and operation of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building.

General Plan – Noise Element

The County of San Diego General Plan, Noise Element, Tables N-1 and N-2 addresses noise sensitive areas and requires an acoustical study to be prepared for any use that may expose noise sensitive areas to noise in excess of a Community Noise Equivalent Level (CNEL) of 60 dBA for single residences (including senior housing, convalescent homes), and 65 dBA CNEL for multi-family residences (including mixed-use commercial/residential). Moreover, if the project is located in an area in excess of 60 dBA CNEL or 65 dBA CNEL, modifications must be made to the project to reduce noise levels. Noise sensitive areas include residences, hospitals, schools, libraries or similar facilities as mentioned within Tables N-1 and N-2. Project

implementation is not expected to expose existing or planned noise sensitive areas to road, airport, heliport, railroad, industrial or other noise in excess of the 60 dBA CNEL or 65 dBA CNEL.

The Noise Report evaluated potential noise impacts to the existing and future noise sensitive land uses from the proposed development. Based on the Noise Report, the nearest noise source to the project site is vehicle traffic on East Bradley Avenue. Vehicle traffic along this roadway would generate future noise levels as high as 49 dBA CNEL, which would be below the 60 dBA CNEL exterior noise standard applicable to the project. This demonstrates conformance with the County Noise Element. Interior noise levels would range from 10 CNEL to 45 CNEL. These levels are below the County of San Diego's 45 CNEL standard for interior noise levels and impacts would be less than significant. Furthermore, vehicle traffic associated with the project would not cause an increase in noise levels of more than 3 dBA CNEL on any roadway segment and no cumulative noise increase of 3 dBA CNEL or more was found. Therefore, the proposed project's direct and cumulative contributions to offsite roadway noise increases would not cause significant impacts to any existing or future noise sensitive land uses. The project would introduce sources of operational noise to the area, including HVAC and PTAC units and a new emergency generator. Operational noise during the daytime (HVAC/PTAC units and generator) and nighttime (HVAC/PTAC units) would not exceed the applicable County noise standards at the property line. Additionally, the generator would be tested twice a month for 30 minutes at a time during the daytime. Therefore, the project would not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, Noise Element.

Noise Ordinance – Section 36.404

The project is also subject to the County Noise Ordinance. Temporary construction noise is subject to Section 36.408, 409, and 410 of the Ordinance. Construction equipment operations are subject to a 75 dBA 8-hour average sound level limit at the boundary of an occupied residence. General construction equipment for grading and preparation of the site would be required. Construction equipment is anticipated to be comprised of a backhoe, hi-lift (a type of front-end loader), sheepsfoot roller, dozer, and trackhoe (similar to an excavator). Grading equipment would be spread out over the project site from adjacent to the occupied properties to distances of over 135 feet away. The report identified that if grading activities involving these five pieces of equipment operate within 137.5 feet of occupied residences, the 8-hour average of 75 dBA would be exceeded, which would be a significant impact. The equipment would operate as close as 25 feet to the occupied residential properties; at this distance, maximum construction noise levels would reach up to 88 dBA L_{max} , which would exceed the County's 82 dBA L_{max} noise threshold. The approximate distance in which construction noise levels would not exceed 82 dBA L_{max} would be 50 feet. Therefore, if construction occurs within 50 feet of the nearby residential properties, construction impacts would be potentially significant. To reduce potential noise impacts from construction equipment, the Noise Report includes construction mitigation. MM NOI-1 would implement temporary sound barriers/blankets between the construction area and adjacent noise-sensitive receivers and provide contact information for noise complaints, as well as noise monitoring if a complaint is issued. The project would be conditioned to install these construction noise reductions prior to commencing grading and construction activities. With implementation of sound barriers/blankets required by MM NOI-1, construction noise levels would be reduced by at least 10 dBA. Therefore, construction noise levels would reach up to approximately 78 dBA L_{max} with mitigation, which would not exceed the

County's 82 dBA L_{max} construction noise threshold. Therefore, incorporation of MM NOI-1 would reduce noise levels to comply with the County Noise Ordinances and result in a less than significant impact.

Non-transportation operational noise generated by the project is not expected to exceed the standards of the County of San Diego Noise Ordinance (Section 36.404) at or beyond the project's property line. The site is zoned Urban-Residential (RU) that has a 1-hour average sound limit of 45 between 10 P.M and 7 A.M and 50 dB between 7 A.M and 10 P.M. The adjacent properties are zoned Mobile-Home Residential (RMH9), Urban-Residential (RU), and Variable-Family Residential (RV), which have the same 1-hour average sound limits. Based on review by staff and the County Noise Specialist, the project's operational noise levels are not anticipated to impact adjoining properties or exceed County Noise Standards, which is 45 dB, because the project operation would not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

The project's conformance to the County of San Diego General Plan Noise Element and County of San Diego Noise Ordinance (Section 36-404 and 36.410) ensures the project would not create cumulatively considerable noise impacts, because the project would not exceed the local noise standards for noise sensitive areas; and the project would not exceed the applicable noise level limits at the property line or construction noise limits, derived from State regulation to address human health and quality of life concerns. Therefore, with MM NOI-1, the project would not contribute to a cumulatively considerable exposure of persons or generation of noise levels in excess of standards established in the local general plan, noise ordinance, and applicable standards of other agencies.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The project proposes a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building where low ambient vibration is essential for interior operation and/or sleeping conditions. However, the project site is located more than 200 feet from any public road or transit Right-of-Way with projected noise contours of 65 dB or more; any property line for parcels zoned industrial or extractive use; or any permitted extractive uses. A distance of 200 feet ensures that the operations would not have any chance of being impacted by groundborne vibration or groundborne noise levels (Harris, Miller Miller and Hanson Inc. 1995). This distance ensures that the project would not be affected by any past, present, or future projects that may support sources of groundborne vibration or groundborne noise.

Construction activities known to generate excessive ground-borne vibration, such as pile driving, would not be conducted by the project. The greatest anticipated source of vibration during general project construction activities would be from a dozer, which may be used within 25 feet of the nearest off-site sensitive receivers (multi-family residences) to the east when accounting for setbacks. A dozer would create approximately 0.089 in/sec peak particle velocity (PPV) at a

distance of 25 feet (Caltrans 2020). This would equal a vibration level of approximately 87 vibration decibels (VdB) and 0.022 one inch per second (in/sec) root mean squared (RMS). Non-transportation vibration sources such as impact pile drivers or hydraulic breakers are significant when their PPV exceeds 0.1 in/sec. While this would exceed the County’s groundborne vibration and noise standards established in the Guideline for Determining the Significance of Ground-Borne Vibration and Noise Impacts, those standards would only apply if construction was occurring at nighttime (as Category 2 is for uses where sleeping may be occurring), for Category 3 buildings where quiet study is required (e.g., classrooms and libraries) or for Category 1 buildings where laboratory uses are located. Construction is not occurring at nighttime, and therefore Category 2 limits would not apply; none of the Category 1 or 3 uses would be located near the project site, and therefore those limits would not apply. In addition, the vibration level of 0.089 in/sec PPV would be lower than Caltrans thresholds of a distinctly perceptible impact for humans at 0.24 in/sec PPV and the structural damage impact to residential structures at 0.2 in/sec PPV. Therefore, although a dozer may be perceptible to nearby human receivers, temporary impacts associated with the dozer (and other potential equipment) would be less than significant.

The project does not propose any major, new or expanded infrastructure such as mass transit, highways, or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels and impact vibration sensitive uses in the surrounding area. There are no existing or proposed operational activities on or near the proposed project site at this time which would cause any significant vibration levels to existing buildings near the project site. Project impacts related to groundborne vibration or groundborne noise levels would be less than significant.

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above existing levels?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The project is subject to the County Noise Element which requires proposed residential development not to be exposed to noise levels exceeding 60 dBA CNEL. Based on the Noise Report (Appendix H), the nearest noise source to the project site would be from vehicle traffic on East Bradley Avenue. Vehicle traffic along this roadway would generate future noise levels as high as 49 dBA CNEL outside of the proposed skilled nursing and assisted living units. This demonstrates conformance with the County Noise Element. Additionally, the project-related contributions to vehicle traffic on nearby roadways would not result in offsite direct/cumulative noise impacts. No further noise mitigation and or measures are required for Noise Element conformance.

Non-transportation noise generated by the project is not expected to exceed the standards of the County of San Diego Noise Ordinance (Section 36.404) at or beyond the project’s property line. Urban-Residential (RU) that has a 1-hour average sound limit of 45 between 10 P.M and 7 A.M and 50 dB between 7 A.M and 10 P.M. The adjacent properties are zoned Mobile-Home Residential (RMH9), Urban-Residential (RU), and Variable-Family Residential (RV), which have the same 1-hour average sound limits. Based on review by staff and the County Noise Specialist,

the project's operational noise levels are not anticipated to impact adjoining properties or exceed County Noise Standards.

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant With Mitigation Incorporated: Temporary and periodic increases in ambient noise from grading activities and construction of the project are addressed above in Section XIII(a). Potential impacts that would be mitigated to less than significant were identified for those activities. Once the project is constructed, the resulting skilled nursing and assisted living land uses would not result in substantial temporary or periodic increases in ambient noise as compared to adjacent residential land uses.

e) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The closest airport to the project site is Gillespie Field, located approximately 0.8 mile to the northwest. The project site is not within the Gillespie Field noise contours and is approximately 0.3 mile south of the 60 CNEL contour (San Diego County Regional Airport Authority 2010). Therefore, the project would not expose people residing or working in the project area to excessive airport-related noise levels.

Mitigation Measures

NOI-1 The project applicant shall reduce construction noise levels at the adjacent residential uses to the east, south, and west of the project site to a noise level not to exceed the County's 82 dBA Lmax construction noise threshold when construction equipment is operating within 50 feet of nearby residential properties to the east, south, or west. This shall be accomplished through the following required measures:

- Installation of temporary sound barriers/blankets along the eastern, western, and southern boundaries adjacent to the multi-family receivers. The temporary barriers/blankets shall have a minimum sound transmission loss of 21 and noise reduction coefficient of 0.75. The temporary barriers/blankets will be of sufficient height to extend from the top of the temporary construction fence and drape on the ground or be sealed at the ground. The temporary barriers/blankets will have grommets along the top edge with exterior grade

hooks, and loop fasteners along the vertical edges with overlapping seams, with a minimum overlap of 2 inches.

- Provide a sign at the yard entrance, or other conspicuous location, that includes a 24-hour telephone number for project information, and a procedure where a field engineer/construction manager will respond to and investigate noise complaints and take corrective action if necessary in a timely manner. The sign will have a minimum dimension of 48 inches wide by 24 inches high. The sign will be placed 5 feet above ground level.
- If a noise complaint(s) is registered, the contractor will retain a County-approved noise consultant to conduct noise measurements at the use(s) that registered the complaint. The noise measurements will be conducted for a minimum of 1 hour and will include 1-minute intervals. The consultant will prepare a letter report for code enforcement summarizing the measurements, calculation data used in determining impacts, and potential measures to reduce noise levels to the maximum extent feasible.

The following measures may also be used to reduce noise levels:

- The use of bells, whistles, alarms, and horns shall be restricted to safety warning purposes only.
- Noise-reducing enclosures shall be used around stationary noise-generating equipment (e.g., compressors and generators) or located as far from sensitive receivers, as feasible.

XIV. POPULATION AND HOUSING.

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The project proposes an expansion of the existing Bradley Court Convalescent Center with a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building, for a total of 97 new beds and a total of 153 beds at the Bradley Court Convalescent Center. The anticipated residents would be located within the region and would not increase population growth. The proposed expansion is consistent with the existing land use and zoning designations for the site. Therefore, implementation of the proposed project would not directly or indirectly induce substantial unplanned population growth, and impacts would be less than significant.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The proposed project would not demolish the existing structures onsite. Therefore, the project would not displace existing people or housing, and impacts would be less than significant.

XV. PUBLIC SERVICES.

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios, response times or other performance objectives for any of the public services:

- i. Fire protection?
- ii. Police protection?
- iii. Schools?
- iv. Parks?
- v. Other public facilities?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The project includes development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building, for a total of 97 new beds and a total of 153 beds at the Bradley Court Convalescent Center. The project would not result in the need for significantly altered public services or facilities including, but not limited to, fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times, or other performance service ratios or objectives for any public services. The project is located immediately adjacent to San Miguel Fire Protection District Station 19. The San Diego County Sheriff’s Department provides police protection to the Project site from the Lakeside Substation, which serves the communities of Lakeside and unincorporated El Cajon, California. The 66 assisted living beds and 31 skilled nursing beds would not result in increased demand for existing neighborhood and regional parks or other recreational facilities. Additionally, the proposed project would include extensive landscaping, various patio areas, and walkways throughout the site. Therefore, the project would not result in the need for new or physically altered governmental facilities, the construction of which would cause a significant impact on the environment. Impacts would be less than significant.

XVI. RECREATION.

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The project includes development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square-foot 31-bed skilled nursing building in the unincorporated community of Lakeside. Surrounding land uses consist of mobile home residences across East Bradley Avenue to the north; multi-family residences to the east, south, and west; and commercial uses to the east and west. The 66 assisted living beds and 31 skilled nursing beds would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Additionally, the proposed project would include extensive landscaping, various patio areas, and walkways throughout the site. Impacts would be less than significant.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

No Impact: The project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, no impacts would occur from the project.

XVII. TRANSPORTATION.

a) Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: The County of San Diego’s Transportation Study Guidelines (TSG) establish thresholds for transportation using VMT. The TSG also establish measures of effectiveness for the performance of the circulation system by incorporating standards from the County of San Diego Public Road Standards and 2011 General Plan Mobility Element.

A Transportation Analysis was prepared for the project by Linscott, Law & Greenspan Engineers dated November 8, 2022 (see Appendix I). The following responses have incorporated the analysis from the report.

Less Than Significant Impact: The Transportation Analysis identified that the proposed Project would generate 263 new daily trips. However, the project would not create a conflict with any performance measures because with the addition of project trips, the circulation system does not degrade to below standards established in the County's TSG. The project would not result in a substantial increase in the number of vehicle trips, volume of capacity ratio on roads, or congestion at intersections in relation to existing conditions.

In addition, the project would not conflict with policies related to non-motorized travel such as mass transit, pedestrian, or bicycle facilities. The El Cajon Transit Center is located approximately 3 miles from the project site, on the southwest corner of the Main Street/Marshall Avenue intersection. There are multiple bus stops along East Bradley Avenue. These stops are served by MTS bus route 833 which runs from the Santee Town Center to the El Cajon Transit Center. MTS bus route 833 runs along Mission Gorge Road, Magnolia Avenue, Graves Avenue, Pepper Drive, Mollison Avenue, Fletcher Pkwy and Arnele Avenue. Weekday service begins at 5:44 AM with 1-hour headways throughout the day and ends at 6:25 PM. Saturday and Sunday service begins at 8:51 AM with 1-hour headways throughout the day and ends at 5:41 PM. The project would take advantage of its proximity to these bus stops, and would not result in a conflict with transit, pedestrian, or bicycle facilities. Therefore, the project would not conflict with any policies establishing measures of the effectiveness for the performance of the circulation system and no mitigation is required.

b) Would the project conflict or be consistent with CEQA Guidelines section 15064.3, subdivision (b)?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: The County of San Diego's Transportation Study Guidelines (TSG) establish thresholds and screening criteria for transportation VMT.

Less Than Significant Impact: The Transportation Analysis utilized the County of San Diego Transportation Study Guidelines (TSG) approved by the Board of Supervisors in September of 2022 (incorporated herein by reference). The TSG provides criteria on how projects should be evaluated for consistency related to the County's transportation goals, policies, and plans, and through procedures established under CEQA. The TSG establishes the contents and procedures for preparing a Transportation Impact Analysis in the County of San Diego. The TSG was updated in 2022 to address legislative changes in SB 743, which changed the basis for evaluating transportation impacts in CEQA from the Level of Service (LOS) metric to the VMT metric. As noted in the TSG, "The legislative intent of SB 743 was to 'more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions.'" To that end, the County performed a qualitative and quantitative analysis (found in Appendix D of the TSG) to determine the appropriate "infill" areas that support SB 743 goals. Qualitative measures included an analysis of the definition of "infill" used in State law, the Federal Census, and scholarly literature. Quantitative information included the use of population density; housing density; employment density; intersection density; access to jobs within a 15-mile radius; and access to shopping/restaurant uses within a 1-mile radius. The qualitative and

quantitative information was applied to the County through GIS to create geographic maps of the County meeting the “infill” criteria.

The Transportation Analysis identified that the proposed project is located within an adopted Infill Area and would meet the proposed VMT screening criteria as the project is located in a Transit Opportunity Areas (TOA) and is not located in a High/Very High FHSZ. The TSG states that projects located within Infill Areas are screened from further VMT analysis and are considered to have a less than significant impact for transportation, because they meet the qualitative and quantitative criteria in the TSG to determine that they are located in a VMT-efficient area and meet the policy goals of SB 743. Development within Infill Areas meets the legislative intent of SB 743, which established VMT as the metric to evaluate transportation for CEQA because promoting development within the County’s denser village areas create a greater diversity of land uses that would encourage transit and lower average VMT over time. Therefore, the project would result in a less than significant impact related to VMT, and no mitigation is required.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant Impact: The proposed project would not significantly alter roadway geometry on East Bradley Avenue. The project site currently takes access from East Bradley Avenue, a County maintained road, via a single full access driveway on the west side of the project site. This driveway is proposed to be relocated eastward to be more centered to the project site. In order to determine if vehicles turning left into the project site would cause a queue resulting in potential congestion and backups along Bradley Avenue in the westbound direction, the Transportation Analysis included a queuing analysis at the project’s driveway. The Transportation Analysis determined that even with the provided on-street parking, vehicles traveling in the westbound direction should be able to maneuver around the project’s inbound trips. Therefore, access to the project driveway would function adequately. A safe and adequate sight distance shall be required at the proposed realigned driveway to the satisfaction of the Director of the Department of Public Works. The driveway improvements would be constructed according to the County of San Diego Public and Private Road Standards. The proposed project would not place incompatible uses (e.g., farm equipment) on existing roadways. Therefore, the proposed project would not significantly increase hazards due to design features or incompatible uses.

d) Would the project result in inadequate emergency access?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant: The project would not generate traffic volumes that would impede emergency access. The proposed plans are required to comply with the County’s emergency

access requirements per the San Diego County Fire Code and Consolidated Fire Code, including turning radius and maneuverability of large emergency vehicles such as fire trucks and ambulances. Additionally, San Miguel Fire Protection District Station 19 is located immediately east of the project site. Therefore, the project would not result in inadequate emergency access, and impacts would be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES.

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code §21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of Historical Resources as defined in Public Resources Code §5020.1(k), or

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation: As previously described, a Cultural Resources Technical Report was prepared for the project by Rincon Consultants, dated September 2024 (Appendix C). As part of the Cultural Resources Report prepared for the project, a records search, a Sacred Lands File search, and pedestrian field survey of the property were conducted.

Less Than Significant Impact: Rincon Consultants contacted the Native American Heritage Commission on April 19, 2021, to request a Sacred Lands File search of the project site. As part of this request, Rincon asked the Native American Heritage Commission to provide a list of Native American groups and/or individuals culturally affiliated with the area who may have knowledge of cultural resources within the project site. The Native American Heritage Commission responded on May 19, 2021, stating the results of the Sacred Lands File search were positive. The Native American Heritage Commission recommended contacting the Baron Group of the Captain Grande, the Viejas Band of Kumeyaay Indians, and the Kumeyaay Cultural Repatriation Committee. On May 20, 2021, Rincon attempted to contact Mr. Clint Linton to discuss the project but a specific response regarding the project was not received.

Ms. Lisa Cumper, Tribal Historic Preservation Officer for the Jamul Indian Village was contacted to provide tribal monitoring for the project. Erica Gonzalez provided tribal monitoring during the pedestrian survey.

Pursuant to AB 52, consultation was initiated with culturally affiliated tribes. The County contacted Barona Band of Mission Indians, Campo Band of Kumeyaay Indians, Jamul Indian Village, Kwaaymii, Manzanita Band of the Kumeyaay Nation, San Pasqual Band of Mission Indians, Iipay Nation of Santa Ysabel, Sycuan Band of the Kumeyaay Nation, and Viejas Band of Kumeyaay Indians via email on April 18, 2024. Barona, Campo, San Pasqual, and Viejas requested consultation and were provided the Cultural Resources Technical Report with negative findings. All consulting Tribes requested concurrence for San Pasqual to be identified as the Native American tribal monitor for the pedestrian field survey conducted as part of the Cultural Resources Technical Report prepared for the project. Consultation with Barona concluded on August 21, 2024 and has concluded with Viejas due to no response. Consultation with the remaining two tribes (i.e., Campo and San Pasqual) is ongoing. No tribal cultural resources have been identified during consultation. As such, impacts to tribal cultural resources would be less than significant.

XIX. UTILITIES AND SERVICE SYSTEMS.

- a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

<input type="checkbox"/>	Potentially Significant Impact	<input type="checkbox"/>	Less than Significant Impact
<input checked="" type="checkbox"/>	Less Than Significant With Mitigation Incorporated	<input type="checkbox"/>	No Impact

Less Than Significant with Mitigation Incorporated: The project includes development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building. The project is served by Helix Water District and no new or expanded water or wastewater facilities are required for the project. As outlined in this Initial Study, the project would not result in an adverse physical effect on the environment because all related impacts from the proposed development have been mitigated to a level below significance. Refer to Section IV. Biological Resources, Section V. Cultural Resources, Section IX. Hazards and Hazardous Materials, and Section XIII. Noise for more information.

Therefore, because the project would not require the construction of new or expanded facilities that could cause significant environmental effects, less than significant impacts would occur.

- b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

<input type="checkbox"/>	Potentially Significant Impact	<input checked="" type="checkbox"/>	Less than Significant Impact
<input type="checkbox"/>	Less Than Significant With Mitigation Incorporated	<input type="checkbox"/>	No Impact

Less Than Significant Impact: The project site is served by Helix Water District. Minimal water would be required during project construction for dust control and suppression. The project is consistent with existing land use and zoning designations for the site; therefore, the urban residential use type is integrated into Helix Water District's current and future water projections. Therefore, the project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

- c) Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant Impact: The project includes development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building in the unincorporated community of Lakeside. As such, wastewater from the project site is conveyed via a network of collector pipes, trunk lines, and pump stations to the City of San Diego's Point Loma Wastewater Treatment Plant for wastewater treatment. The Point Loma Wastewater Treatment Plant currently has wastewater treatment capacity of 240 million gallons per day (gpd) and currently only treats 175 million gpd (City of San Diego 2023). Therefore, the Point Loma Wastewater Treatment Plant has capacity to serve the project, and the project would not interfere with any wastewater treatment providers service capacity. Impacts would be less than significant.

- d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant Impact: The project includes development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building, which would result in long-term operational solid waste generation. There are five, permitted active landfills in San Diego County with remaining capacity, including Borrego Landfill (111,504 cubic yards [cy] remaining capacity), Otay Landfill (21,194,008 cy remaining capacity), West Miramar Sanitary Landfill (11,080,871 cy remaining capacity), Sycamore Landfill (113,972,637 cy remaining capacity), San Onofre Landfill (1,057,605 cy remaining capacity), and Las Pulgas Landfill (9,503,985 cy remaining capacity). Therefore, there is sufficient existing permitted solid waste capacity to accommodate the project's solid waste disposal needs and the project would not impair the attainment of solid waste reduction goals, and impacts would be less than significant.

- e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

- Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Less than Significant Impact: The project includes development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building, which would result in long-term operational solid waste generation. All solid waste facilities, including landfills, require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency, issues solid waste facility permits with concurrence from CalRecycle under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). The County requires recycling of 90 percent of inerts and 70 percent of all other materials from construction projects, per County Ordinance Section 68.508 through 68.518 (Diversion of Construction and Demolition Materials from Landfill Disposal). The project would be in compliance with County ordinances upon submission of a Construction and Demolition Debris Management Plan prior to the issuance of a building permit. Project operations and waste management methods would be consistent with the County's Strategic Plan to Reduce Waste (2017) through the support of commercial composting programs to reduce organic waste and comply with established waste diversion requirements (refer to Section VIII. Greenhouse Gas Emissions). The project would deposit all solid waste at a permitted solid waste facility, and therefore, would comply with federal, state, and local statutes and regulations related to solid waste.

XX. WILDFIRE.

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

- a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

- Potentially Significant Impact Less than Significant Impact
 Less Than Significant With Mitigation Incorporated No Impact

Discussion/Explanation: The project site is not located within a high or very high FHSZ; therefore, the project is not required to prepare a Fire Protection Plan.

Less Than Significant Impact: The project would be served by the San Miguel Fire Protection District Station 19, immediately east of the project site. As described in Section IX(e), the project would not substantially impair an adopted emergency response plan or evacuation plan. The project would include construction and operation of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square-foot 31-bed skilled nursing building, with no growth-inducing project components since the anticipated residents would be located within the region and would not increase population growth. Therefore, no substantial demand beyond current conditions is required for emergency response. Project access would be from a

driveway along Bradley Avenue. Project access would comply with County road standards (e.g., road and street grade below 20 percent, paved streets with capacity to support up to 75,000 pounds, etc.). Therefore, the project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

- b) Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentration from a wildfire or the uncontrolled spread of a wildfire?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant Impact: The project site is within a local responsibility area and is not within an identified FHSZ. Given that the majority of the County is in the high and very high FHSZ, the County has implemented fire safety measures depending on specific factors, such as location, vegetation, etc. Homes near the project site and their compliance with fuel modification requirements lower the fire threat and risk to the proposed project.

The project does not propose any vegetation that would be considered flammable, and is required to meet applicable fire measures, such as fire apparatus access and access road requirements. To ensure the project does not exacerbate wildfire risks, the project would be required to include non-combustible roofing and non-combustible or standard fire-resistive building materials, per the San Miguel Fire Protection District requirements. Therefore, the project would not expose project occupants, such as employees or residents, to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Additionally, San Miguel Fire Protection District Station 19 is located immediately east of the project site. Impacts would be less than significant.

- c) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

- | | | | |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Less Than Significant Impact: The project would include development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building and does not propose any structures or additional infrastructure that would exacerbate fire risk. Development and operation of the proposed project would be required to comply with the County Fire Code and Consolidated Fire Code, and compliance with the San Miguel Fire Protection District's requirements. Therefore, based on project coordination with County staff and compliance with the County's and San Miguel Fire Protection District's requirements, impacts associated with fire risk would be less than significant.

d) Would the project expose people or structure to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Less Than Significant Impact: The project would include development of a new 25,515 square-foot assisted living building with 66 resident beds and a new 10,613 square foot 31-bed skilled nursing building, including associated grading and paving activities on-site. As described in Section X, Hydrology, the project site is not currently prone to flooding; therefore, the project site would not be prone to onsite flooding following construction of the project. In addition, contaminated soils would be removed from the project site (refer to Section IX, Hazards and Hazardous Materials), and project grading also must conform to the grading requirements outlined in the County Grading Ordinance and be verified in the field by a licensed or registered Civil Engineer and inspected by County Grading Inspectors. Due to the aforementioned factors, the project site would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Impacts are less than significant.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant with Mitigation Incorporated: The potential of the Project to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in Section IV and Section V of this Initial Study. In addition to project-specific impacts, this evaluation considered the project’s potential for significant cumulative effects. Resources that have been evaluated as significant would be potentially impacted by the project. However, mitigation has been included that clearly reduces these effects to a level below significance. Please see Section IV, Section V, and Section IX, and Section XIII above. This mitigation includes nesting bird surveys, cultural monitoring and reporting, soil remediation, and temporary sound barriers during construction. As a result of this evaluation, there is no substantial evidence that, after mitigation, significant effects associated with this project would result. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant with Mitigation Incorporated: The following list of past, present and future projects were considered and evaluated as a part of this Initial Study:

PROJECT NAME	PERMIT/MAP NUMBER	DETAILS
Lake Jennings Marketplace	TM 5590	Commercial Development, 6 buildings totaling 76,100 sq. ft., 10,992 ADT, Road and I-8 ramp/Lake Jennings Park Road improvements required, Cultural Resource

		monitoring, offsite mitigation for impacts to Coast live oak woodland and non-native grassland, onsite open space for wetlands, mitigation for construction phase noise.
Riker Ranch	TM 5592	Subdivide 6.24 acres into 21 single-family residential lots, 230 ADT, no direct traffic impacts, cumulative traffic impacts addressed by TIF payment, bio impacts - 1.4 acres non-native grassland mitigated at 0.5:1, impacts to cultural and historical resources mitigated through documentation including mapping, construction monitoring for subsurface resources, implement FPP requirements to address fire protection, implement SWMP to address potential for construction and post-construction phase pollutants .
El Monte Sand Mine	MUP-99-014W2	Sand mining for 12.5 million tons over 12 years plus 4 additional years to finish reclamation/revegetation, significant and unavoidable aesthetic, land use, and mineral resources impacts, impacts to 0.12 acres riparian habitat, 3.6 acres coastal sage scrub, 41.8 acres tamarisk scrub, 0.36 acres non-vegetated channel, and 86.6 acres non-native grassland are mitigated to less than significant, impacts to cultural resources mitigated to less than significant with open space and monitoring for unknown subsurface resources, impacts to paleontological resources mitigated to less than significant with monitoring for potential subsurface resources, noise impacts mitigated to less than significant through buffering distance, noise berms, limit operational hours, no queuing of trucks at project entrance, traffic impacts mitigated to less than significant with road/intersection improvements
Fanita Ranch	City of Santee project – GPA2017-2, AEIS2017-11	2,300+ acre project site, ~3,000 residential units, 80,000 sq. ft. commercial, 1,650 acres open space, impacts mitigated to less than significant with mitigation include air quality, biological resources (975 acres critical habitat for California gnatcatcher, 967 acres critical habitat for Hermes copper butterfly, Engelmann and Coast live

		oak trees, several other species and habitats), cultural resources (habitation site, artifacts), geology/soils, paleontological resources, greenhouse gas emissions, noise, and tribal cultural resources. Impacts that remain unavoidable with incorporation of mitigation include air quality, noise, and transportation/traffic (including VMT).
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The potential for adverse cumulative effects were considered in Sections I through XX of Initial Study. In addition to project-specific impacts, this evaluation considered the project’s potential for incremental effects that are cumulatively considerable. As a result of this evaluation, and in consideration of all mitigation required by the project, there were determined to be no potentially significant cumulative effects the project would have a considerable contribution to. Mitigation has been included for project impacts that clearly reduces any potential for a considerable contribution to any cumulative effects to a level below significance. Please refer to Section IV. *Biological Resources*, Section V. *Cultural Resources*, Section IX. *Hazards and Hazardous Materials*, and Section XIII. *Noise* above. This mitigation includes but is not limited to nesting bird surveys, cultural monitoring and reporting, soil remediation, and temporary sound barriers during construction. As a result of this evaluation, there is no substantial evidence that, after mitigation, the project would have any considerable contribution to a cumulative impact. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less Than Significant with Mitigation Incorporated: In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in Section I. *Aesthetics*, Section III. *Air Quality*, Section VII. *Geology and Soils*, Section IX. *Hazards and Hazardous Materials*, Section X. *Hydrology and Water Quality*, Section XIII. *Noise*, Section XIV. *Population and Housing*, and Section XVII. *Transportation*. As a result of this evaluation, there were determined to be potentially significant effects to human beings related to potential hazardous materials and noise impacts. However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes soil remediation and temporary sound barriers during construction. As a result of this evaluation, there is no substantial evidence that, after mitigation, there are adverse effects to human beings associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

XXII. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

All references to Federal, State and local regulation are available on the Internet. For Federal regulation refer to <http://www4.law.cornell.edu/uscode/>. For State regulation refer to www.leginfo.ca.gov. For County regulation refer to www.amlegal.com. All other references are available upon request.

Appendix A – Air Quality Report

Appendix B – Biological Resources Letter Report

Appendix C – Cultural Resources Technical Report

Appendix D – Greenhouse Gas Memorandum

Appendix E – Phase I Environmental Site Assessment

Appendix F – Priority Development Project Storm Water Quality Management Plan

Appendix G – Preliminary Drainage Report

Appendix H – Noise Report

Appendix I – Transportation Analysis

California Air Resources Board (CARB). 2017. California's 2017 Climate Change Scoping Plan. December 14, 2017.
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**MULTIPLE SPECIES CONSERVATION PROGRAM
CONFORMANCE STATEMENT**

**BRADLEY COURT CONVALESCENCE
PDS2021-MUP-85-053W2, APN 387-142-36-00**

January 5, 2024

Summary

The project proposes expanding the existing Bradley Court Convalescent Center to construct a 25,675 square-foot assisted living building and a 11,048 square-foot skilled nursing building. The project site is located within the Metro-Lakeside-Jamul segment of the County's Multiple Species Conservation Program (MSCP) Subarea Plan. The project is therefore required to conform to the MSCP and the Biological Mitigation Ordinance (BMO).

Statement of Fact

There are no sensitive habitats or species within the proposed project area. The site is entirely urban/developed and disturbed and does not support native vegetation. As a Tier IV habitat, no on-site preservation is required and impacts to urban/developed and disturbed do not require mitigation under the BMO. No impacts to wildlife corridors or linkages will occur as the project site does not support geological, topographic or habitat features that would function in a corridor capacity. Furthermore, the site is not classified as a Biological Resource Core Area as it is not within the Pre-Approved Mitigation Area, is not within or adjacent to a large block of undisturbed habitat, is not mapped as having high habitat value and does not support sensitive species. Given the current site conditions and the surrounding land uses, development of this project will not hinder the formation of a future preserve system.

In order to comply with the Migratory Bird Treaty Act (MBT), the project has been conditioned to complete brushing, clearing, and/or grading outside of the nesting bird breeding season (February 15-August 31) or complete a preconstruction survey to determine the presence of nesting birds within the vicinity of brushing, clearing and/or grading.

Conclusion

After consideration of the above facts, the proposed project is found to be in conformance with the Multiple Species Conservation Program and the Biological Mitigation Ordinance.

**REVIEW FOR APPLICABILITY OF/COMPLIANCE WITH
ORDINANCES/POLICIES**

**FOR PURPOSES OF CONSIDERATION
PDS2021-MUP-85-053W2, PDS2021-ER-21-14-004**

December 12, 2024

I. HABITAT LOSS PERMIT ORDINANCE – Does the proposed project conform to the Habitat Loss Permit/Coastal Sage Scrub Ordinance findings?

YES

NO

NOT APPLICABLE/EXEMPT

Discussion:

The proposed project and any off-site improvements are located within the boundaries of the Multiple Species Conservation Program. Therefore, conformance to the Habitat Loss Permit/Coastal Sage Scrub Ordinance findings is not required.

II. MSCP/BMO - Does the proposed project conform to the Multiple Species Conservation Program and Biological Mitigation Ordinance?

YES

NO

NOT APPLICABLE/EXEMPT

Discussion:

The proposed project and any off-site improvements related to the proposed project are within the boundaries of the Multiple Species Conservation Program. The project conforms with the Multiple Species Conservation Program and the Biological Mitigation Ordinance as discussed in the MSCP Findings dated January 5, 2024.

III. GROUNDWATER ORDINANCE - Does the project comply with the requirements of the San Diego County Groundwater Ordinance?

YES

NO

NOT APPLICABLE/EXEMPT

Discussion:

The project will obtain its water supply from the Helix Water District Municipal Water District which obtains water from surface reservoirs and/or imported sources. The project will not use any groundwater for any purpose, including irrigation or domestic supply.

IV. RESOURCE PROTECTION ORDINANCE - Does the project comply with:

The wetland and wetland buffer regulations (Sections 86.604(a) and (b)) of the Resource Protection Ordinance?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	NOT APPLICABLE/EXEMPT <input type="checkbox"/>
The Floodways and Floodplain Fringe section (Sections 86.604(c) and (d)) of the Resource Protection Ordinance?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	NOT APPLICABLE/EXEMPT <input type="checkbox"/>
The Steep Slope section (Section 86.604(e))?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	NOT APPLICABLE/EXEMPT <input type="checkbox"/>
The Sensitive Habitat Lands section (Section 86.604(f)) of the Resource Protection Ordinance?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	NOT APPLICABLE/EXEMPT <input type="checkbox"/>
The Significant Prehistoric and Historic Sites section (Section 86.604(g)) of the Resource Protection Ordinance?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	NOT APPLICABLE/EXEMPT <input type="checkbox"/>

Discussion:

Wetland and Wetland Buffers:

The site contains no wetland habitats as defined by the San Diego County Resource Protection Ordinance. The site does not have a substratum of predominately undrained hydric soils, the land does not support, even periodically, hydric plants, nor does the site have a substratum that is non-soil and is saturated with water or covered by water at some time during the growing season of each year. Therefore, it has been found that the proposed project complies with Sections 86.604(a) and (b) of the Resource Protection Ordinance.

The Floodways and Floodplain Fringe:

The site is not underlain by poor artificial fill or located within the floodways and floodplain fringe.

Steep Slopes:

Slopes with a gradient of 25 percent or greater and 50 feet or higher in vertical height are required to be placed in open space easements by the San Diego County Resource Protection Ordinance (RPO). The project site is currently developed and relatively flat and is developed with the existing Bradley Court Convalescent Center.

Sensitive Habitats:

Sensitive habitat lands include unique vegetation communities and/or habitat that is either necessary to support a viable population of sensitive species, is critical to the proper functioning of a balanced natural ecosystem, or which serves as a functioning wildlife corridor. No sensitive habitat lands were identified on the site. Therefore, it has been found that the proposed project complies with Section 86.604(f) of the RPO.

Significant Prehistoric and Historic Sites:

The property has been surveyed by a County of San Diego approved archaeologist, Ken Victorino, and it has been determined that the property does not contain any archaeological/historical sites. As such, the project complies with the RPO.

V. STORMWATER ORDINANCE (WPO) - Does the project comply with the County of San Diego Watershed Protection, Stormwater Management and Discharge Control Ordinance (WPO)?

YES NO NOT APPLICABLE

Discussion:

The project Storm Water Management Plan and Hydromodification Management Study have been reviewed and are found to be complete and in compliance with the WPO.

VI. NOISE ORDINANCE – Does the project comply with the County of San Diego Noise Element of the General Plan and the County of San Diego Noise Ordinance?

YES NO NOT APPLICABLE

Discussion:

The project would not expose people to nor generate potentially significant noise levels during operation which exceed the allowable limits of the County of San Diego Noise Element of the General Plan, County of San Diego Noise Ordinance, and other applicable local, State, and Federal noise control regulations.

Staff has reviewed the Noise Report prepared for this project by Rincon Consultants and dated September 2024. The main noise sources from this project are traffic noise, heating, ventilation, and air conditioning (HVAC) and packaged terminal air conditioning (PTAC) units and a new emergency generator. The property is also subject to the daytime thresholds of 55 dBA and 52.5 dBA and nighttime thresholds of 47.5 dBA and 50 dBA for nearby multi-family and commercial uses. Based on the report, the property line noise levels would be less than the Noise Ordinance limit applicable to each zone. Based on the information provided, the project is expected to be in compliance with the Noise Ordinance, Section 36.404 without mitigation.

In addition, the project demonstrated compliance with the County’s General Plan Noise elements. The proposal would not expose people to nor generate potentially significant noise levels which exceed the allowable limits of the County of San Diego Noise Element of the General Plan. The project would not cause an increase in traffic generation that results in any roadways to noise levels that exceed 3 dB CNEL.

The project is also subject to the County Noise Ordinance which regulates temporary construction noise associated with the project, Sections 36.408 and 36.409. Section 36.409 of the County Noise Ordinance states that construction noise shall not exceed 75

dBA at the property line during an eight-hour period between 7 a.m. to 7 p.m. or exceed 82 dBA Lmax at any time. It is unlawful to operate construction equipment between 7 pm and 7 am and no work shall be done on Sundays and Holidays, per Section 36.408. Based on the information provided, the noise levels generated from the construction activities could exceed the standards if construction occurs within 50 feet of the nearby residential properties and construction impacts could be potentially significant. Therefore, mitigation has been included in the project conditions to reduce these impacts to less than significant.

Attachment D – Environmental Findings

Bradley Court Convalescent Center

PDS2021-MUP-85-053W2; PDS2021-ER-21-14-004

ENVIRONMENTAL FINDINGS

February 28, 2025

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) FINDINGS

1. Find that the Planning Commission has reviewed and considered the information contained in the Mitigated Negative Declaration on file with Planning & Development Services as Environmental Review Number PDS2021-ER-21-14-004 before making its decision on the proposed project.
2. Adopt the Mitigation and Monitoring Program as incorporated into the project conditions of approval pursuant to CEQA Guidelines section 15074(d).
3. Find that the proposed project is consistent with the Resource Protection Ordinance (County Code, section 86.601 et seq.).
4. Find that the project is consistent with the Multiple Species Conservation Plan (MSCP), the County Subarea Plan and the Biological Mitigation Ordinance (County Code, Section 86.501 et seq.) as explained in the MSCP Findings dated January 5, 2024, on file with Planning & Development Services as Environmental Review Number PDS2021-MUP-85-053W2; PDS2021-ER-21-14-004.
5. Find that plans and documentation have been prepared for the proposed project that demonstrate that the project complies with the Watershed Protection, Stormwater Management, and Discharge Control Ordinance (County Code, section 67.801 et seq.).

Attachment E – Public Documentation



6 - 174

County of San Diego, Planning & Development Services
**COMMUNITY PLANNING OR SPONSOR
GROUP PROJECT REVIEW**
ZONING DIVISION

Record ID(s): PDS2021-MUP-85-053W2

Project Name: BRADLEY COURT CONVALESCENCE

Project Manager: NICOLAS GUSTAFSON

Project Manager's Phone: (619) 323-7314

Scope of Review:

Board Policy I-1 states; "groups may advise the appropriate boards and commissions on discretionary projects as well as on planning and land use matters important to the community." Planning & Development Services (PDS) has received an application for the project referenced above. PDS requests your Group evaluate and provide comment on the project in the following areas:

- The completeness and adequacy of the Project Description
- Compatibility of the project design with the character of the local community
- Consistency of the proposal with the Community Plan and applicable zoning regulations
- Specific concerns regarding the environmental effects of the project (e.g., traffic congestion, loss of biological resources, noise, water quality, depletion of groundwater resources)

Initial Review and Comment:

Shortly after an application submittal, a copy of the application materials will be forwarded to the Chair of the applicable Planning or Sponsor Group. The project should be scheduled for initial review and comment at the next Group meeting. The Group should provide comments on planning issues or informational needs to the PDS Project Manager.

Planning Group review and advisory vote:

- A. **Projects that do not require public review of a CEQA document:** The Group will be notified of the proposed hearing date by the PDS Project Manager. The project should be scheduled for review and advisory vote at the *next Group meeting*.
- B. **Projects that require public review of a CEQA document:** The Chair of the Planning Group will be notified when an environmental document has been released for public review. The final review of the project by the Group, and any advisory vote taken, should occur *during the public review period*.

As part of its advisory role, the Group should provide comments on both the adequacy of any environmental document that is circulated and the planning issues associated with the proposed project. The comments provided by the Group will be forwarded to the decision-making body and considered by PDS in formulating its recommendation.

Notification of scheduled hearings:

In addition to the public notice and agenda requirements of the Brown Act, the Group Chair should notify the project applicant's point of contact and the PDS Project Manager at least two weeks in advance of the date and time of the scheduled meeting.

5510 OVERLAND AVE, SUITE 110, SAN DIEGO, CA 92123 • (858) 565-5981 • (888) 267-8770

<http://www.sdcountry.ca.gov/pds>



County of San Diego, Planning & Development Services
**COMMUNITY PLANNING OR SPONSOR
GROUP PROJECT RECOMMENDATION**
ZONING DIVISION

Record ID(s): PDS2021-MUP-85-053W2

Project Name: BRADLEY COURT CONVALESCENCE

Planning/Sponsor Group: Lakeside Community Planning Group

Results of Planning/Sponsor Group Review

Meeting Date: 08/03/2022

A. Comments made by the group on the proposed project.

NONE

B. Advisory Vote: The Group **Did** **Did Not** make a formal recommendation, approval or denial on the project at this time.
If a formal recommendation was made, please check the appropriate box below:

- MOTION:**
- Approve without conditions
 - Approve with recommended conditions
 - Deny
 - Continue

VOTE: 11 Yes 0 No 0 Abstain 4 Vacant/Absent

C. Recommended conditions of approval:

Approved based on Planning/Land Use with the agreement the applicant returns to present design items including but not limited to complete site plan, landscape design, stormwater, site lighting, signage and any modifications related to plans for the relocation of the entry driveway.

Reported by: CAROL HAKE Position: CHAIR Date: 08/04/2022

Please email recommendations to BOTH EMAILS;
Project Manager listed in email (in this format): Firstname.Lastname@sdcounty.ca.gov and to CommunityGroups.LUEG@sdcounty.ca.gov

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<http://www.sdcounty.ca.gov/pds>



From: [Hofreiter, Daniella T](#)
To: [Hofreiter, Daniella T](#)
Subject: FW: [External] Re: Bradley Court Convalescent Center Planning Commission Hearing on 2/28/2025
Date: Monday, February 3, 2025 3:50:40 PM

From: Frank HILLIKER <frankldrb@gmail.com>
Sent: Monday, February 3, 2025 3:41 PM
To: Hofreiter, Daniella T <DaniellaT.Hofreiter@sdcounty.ca.gov>
Cc: Lakeside Planning Group <lakesidecpg@gmail.com>; Steve L'Hommedieu <slhommedieu@arco1.com>; Thomas Jurbala <ThomasJurbala@lifegen.net>; Burke TJ <tburke@arco1.com>; Steve L'Hommedieu <slhommedieu@arco1.com>; Burke TJ <tburke@arco1.com>
Subject: [External] Re: Bradley Court Convalescent Center Planning Commission Hearing on 2/28/2025

Daniella,

This project was approved by the LDRB as you can see with the attached plans you sent me.

Frank Hilliker
Chairman
Lakeside Design Review Board

SITE INFORMATION

APN#1: 387 142 34 00
 LAND AREA: 3.4 ACRES / 147,864.24 SF
 CIRCUL AREA: 3.34 ACRES / 146,465.97 SF
 NET AREA:
 ZONING: RU - RESIDENTIAL URBAN
 ADDRESS: 675 EAST BRADLEY AVENUE
 EL CAJON, CA 92021
 OWNER: MR. THOMAS JURBALA
 85 CAYON REAL ESTATE, LLC
 6 HUTTON CENTRE DRIVE, SUITE 400
 SANTA ANA, CA 92707

EXISTING BUILDING 1 SKILLED NURSING DATA

EXISTING USE: SKILLED NURSING FACILITY
 OCCUPANCY: I-2 (W/ DELAYED EGRESS)
 CONSTRUCTION TYPE: VA
 FIRE SPRINKLERED: YES
 STORES: 1
 AREA: 11,950 S.F.
 EXISTING BEDS: 28 BEDS

EXISTING BUILDING 2 SKILLED NURSING DATA

PROPOSED USE: SKILLED NURSING FACILITY
 OCCUPANCY: I-2 (W/ DELAYED EGRESS)
 CONSTRUCTION TYPE: VA
 FIRE SPRINKLERED: YES
 STORES: 1
 AREA: 11,500 S.F.
 EXISTING BEDS: 28 BEDS

NEW BUILDING 3 SKILLED NURSING DATA

PROPOSED USE: SKILLED NURSING FACILITY
 OCCUPANCY: I-2 (W/ DELAYED EGRESS)
 CONSTRUCTION TYPE: VA
 FIRE SPRINKLERED: YES
 STAFF: 8
 STORES: 1
 AREA: 111,048 S.F.

ROOM/USED COUNT:
 (1) PRIVATE: 1 BEDS
 (12) SEMI-PRIVATE: 26 BEDS
 TOTAL BEDS: 27 BEDS

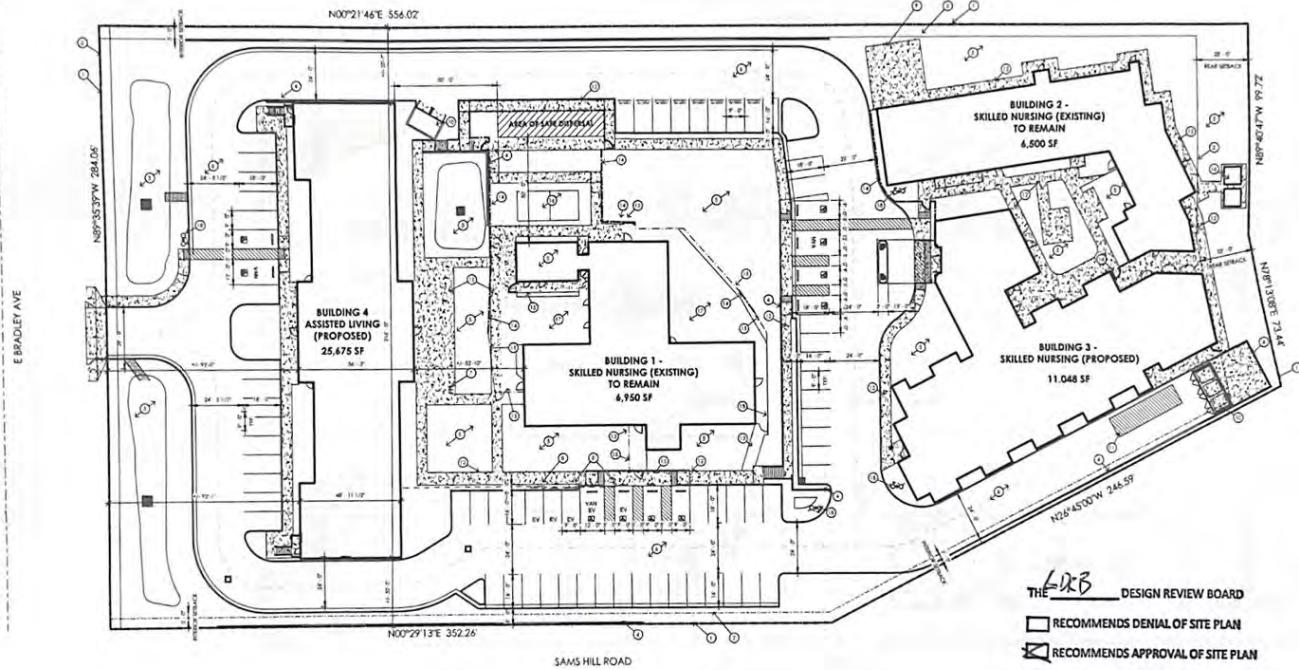
NEW ASSISTED LIVING FACILITY DATA

PROPOSED USE: ASSISTED LIVING FACILITY
 OCCUPANCY: R-2 F
 CONSTRUCTION TYPE: VA
 FIRE SPRINKLERED: YES
 STAFF: 8
 STORES: 2 W/ BASEMENT
 TOTAL AREA: 225,675 S.F.

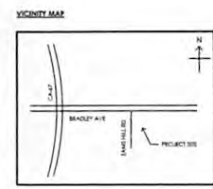
ROOM/USED COUNT:
 (42) PRIVATE UNITS: 42 BEDS
 (22) PRIVATE UNITS: 24 BEDS
 TOTAL BEDS: 66 BEDS

PARKING TABULATION

REQUIRED PARKING:
 MEDICAL CARE FACILITIES 0.31 PER BED: 15,510.32 @ 30'
 TOTAL PARKING REQUIRED: 69
 PARKING PROVIDED:
 STANDARD SPACES: 53
 CLEAN AIR / ELECTRICAL VEHICLE SPACE: 8
 ELECTRIC VEHICLE CHARGING SPACE: 3
 ACCESSIBLE ELECTRIC VEHICLE CHARGING SPACE: 7
 ACCESSIBLE PARKING SPACES: 8
 TOTAL PARKING PROVIDED: 74
 TOTAL BICYCLE SPACES PROVIDED: 3



- KEYNOTES**
- 1 PROPERTY LINE
 - 2 UTILITY
 - 3 BOUNDARY
 - 4 CASH RETAINING WALL SEE CIVIL FOR HEIGHT
 - 5 LANDSCAPE
 - 6 APPROVAL FILING
 - 7 BICYCLE PARKING
 - 8 EV CHARGER AND UNDERGROUND CONDUIT
 - 9 GEMMA/SMART INCLOSURE BY 4" P.V. BOLD BRICKS (CAN BE PLACED PER IO WHICH PROVIDES ADDRESS)
 - 10 COVERED WALK ENCLOSURE PER COUNTY OF SAN DIEGO ENHANCED
 - 11 10' R OF LOADING SPACE
 - 12 CONCRETE SIDEWALK
 - 13 BERMING CONCRETE SIDEWALK
 - 14 P.P.M. CHAIN LINK FENCE
 - 15 BERMING P.P.M. CHAIN LINK FENCE
 - 16 BERMING STORAGE UNITS
 - 17 BERMING CONCRETE PAVED
 - 18 SEE APPURTENANCES



THE **ARB** DESIGN REVIEW BOARD
 RECOMMENDS DENIAL OF SITE PLAN
 RECOMMENDS APPROVAL OF SITE PLAN
 RECOMMENDS APPROVAL WITH CONDITIONS AS NOTED ON DRAWINGS

[Signature] 9-11-24
 Chair Date

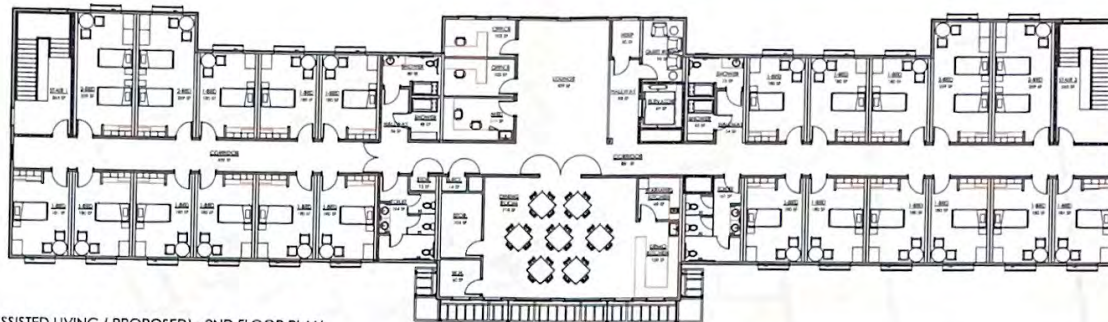


**SKILLED NURSING FACILITY (PROPOSED) + ASSISTED LIVING (PROPOSED)
 BRADLEY TERRACES**

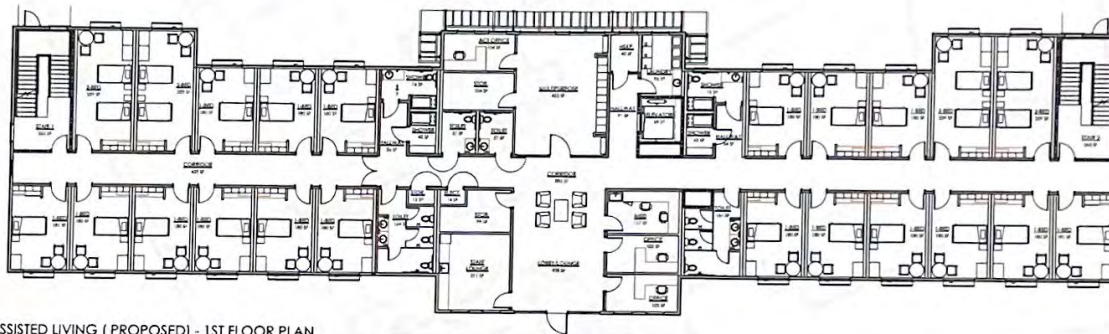
ARCHITECTURE PLOT PLAN

ARCHITECTURE • INTERIORS • PLANNING
 351 NORTH BRADLEY STREET, SUITE 101
 ORANGE, CA 92668 P: 714.931.1855
 PROJECT#: 20200 10/24/2022

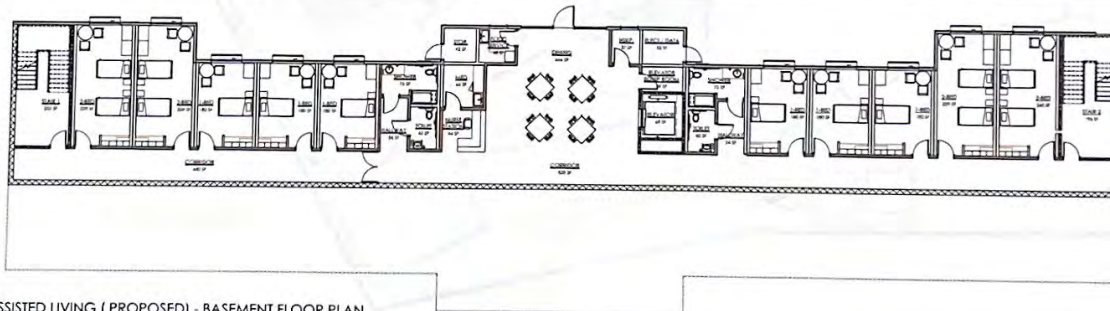




BUILDING 4 - ASSISTED LIVING (PROPOSED) - 2ND FLOOR PLAN



BUILDING 4 - ASSISTED LIVING (PROPOSED) - 1ST FLOOR PLAN



BUILDING 4 - ASSISTED LIVING (PROPOSED) - BASEMENT FLOOR PLAN

SKILLED NURSING FACILITY (PROPOSED) + ASSISTED LIVING (PROPOSED)
BRADLEY TERRACES

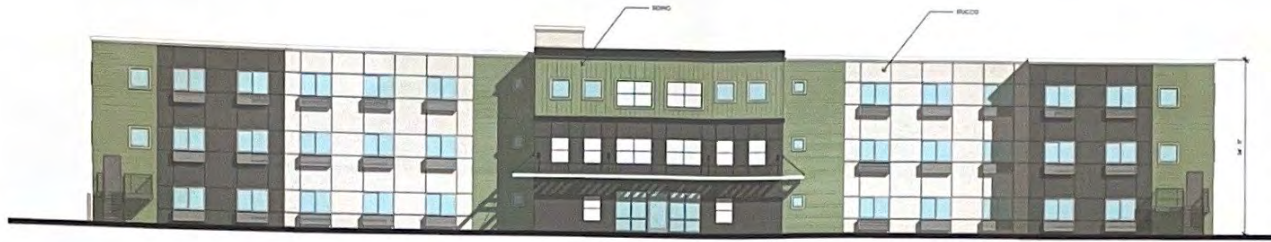


BUILDING 4 - ASSISTED LIVING (PROPOSED) - FLOOR PLAN

ARCHITECTURE + INTERIORS + PLANNING
521 NORTH BAMPFAY STREET, SUITE 101
ORANGE, CA 92668 P: 714 937 1185
PROJECT# 20090 10/24/2022



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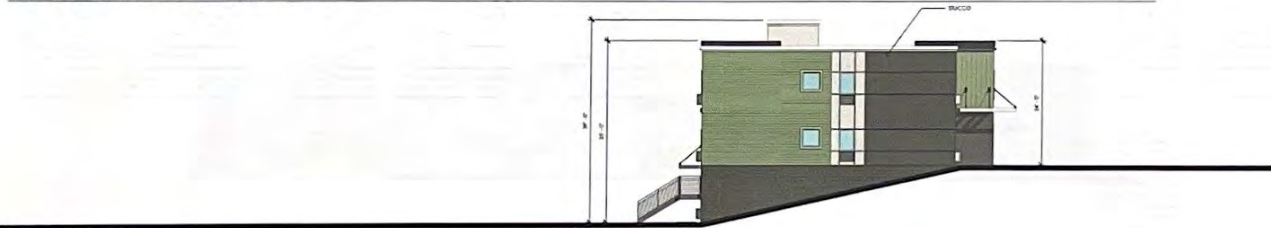
BUILDING 4 - ASSISTED LIVING (PROPOSED) - NORTH ELEVATION



BUILDING 4 - ASSISTED LIVING (PROPOSED) - EAST ELEVATION



BUILDING 4 - ASSISTED LIVING (PROPOSED) - SOUTH ELEVATION



BUILDING 4 - ASSISTED LIVING (PROPOSED) - WEST ELEVATION

DESIGN REVIEW BOARD
 THE
 DENIAL OF SITE PLAN
 RECOMMENDATION
 APPROVAL OF SITE PLAN
 RECOMMENDATION
 APPROVAL WITH CONDITIONS
 RECOMMENDATION
 AS NOTED

Date _____
 Chief _____

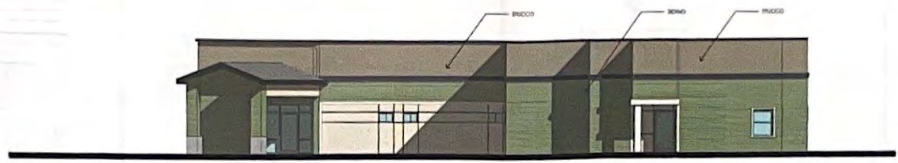
**SKILLED NURSING FACILITY (PROPOSED) + ASSISTED LIVING (PROPOSED)
 BRADLEY TERRACES**

BUILDING 4 - ASSISTED LIVING (PROPOSED) - ELEVATIONS



ARCHITECTURE + INTERIORS + PLANNING
 221 NORTH BAYVIEW STREET, SUITE 101
 ORANGE, CA 92668 P: 714.952.1186
 PROJECT: 2020 10/04/2022

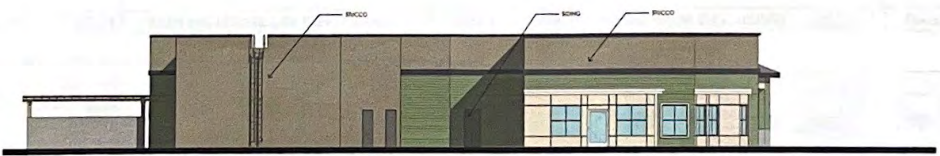




BUILDING 3 - SKILLED NURSING FACILITY (PROPOSED) - NORTH ELEVATION



BUILDING 3 - SKILLED NURSING FACILITY (PROPOSED) - EAST ELEVATION



BUILDING 3 - SKILLED NURSING FACILITY (PROPOSED) - SOUTH ELEVATION



BUILDING 3 - SKILLED NURSING FACILITY (PROPOSED) - WEST ELEVATION



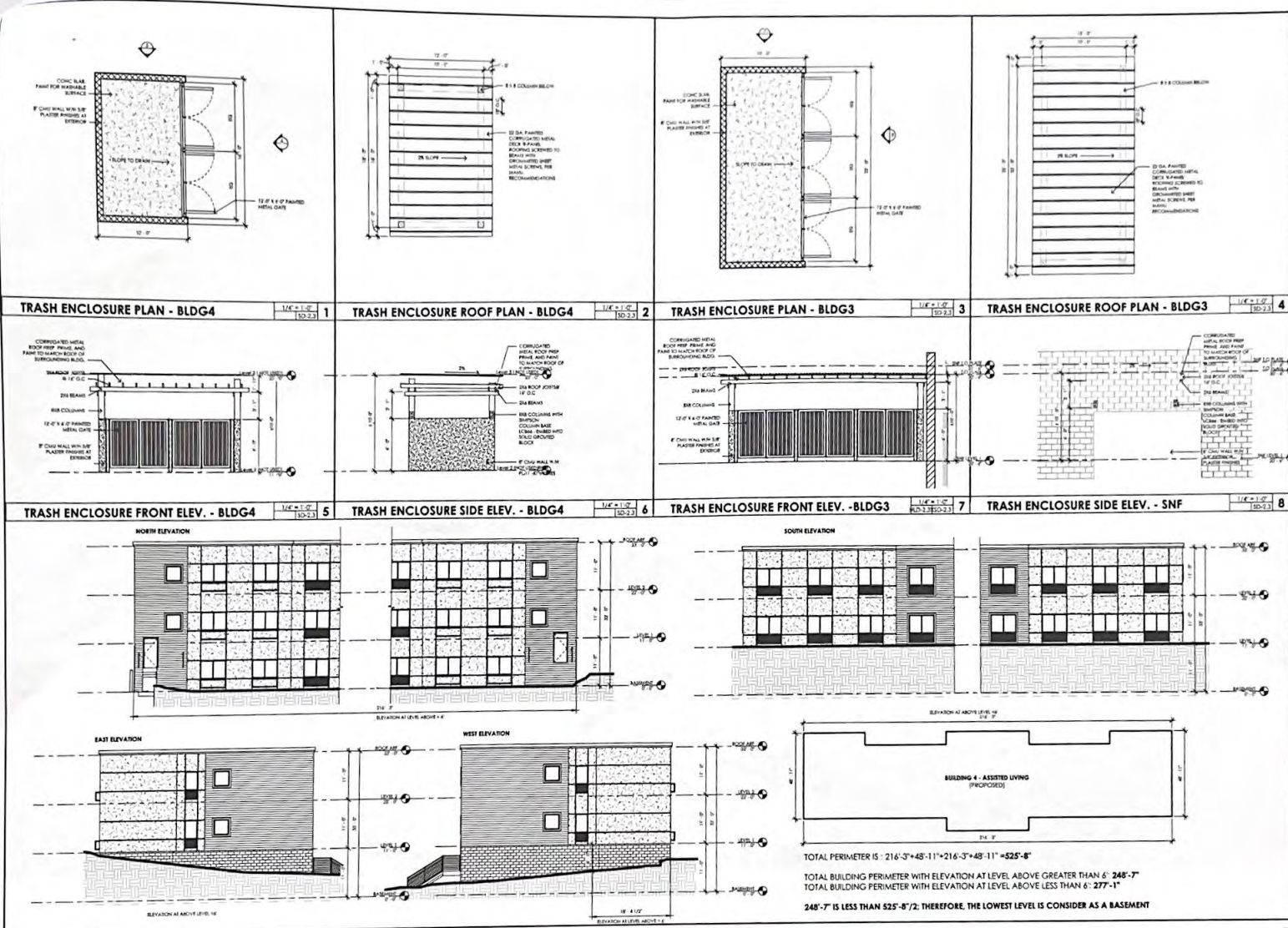
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IN DRAWING

**SKILLED NURSING FACILITY (PROPOSED) + ASSISTED LIVING (PROPOSED)
BRADLEY TERRACES**

BUILDING 3 - SKILLED NURSING FACILITY (PROPOSED) - ELEVATIONS

ARCHITECTURE + INTERIORS + PLANNING
22 NORTH BARKHART STREET, SUITE 101
ORANGE, CA 92668 • P 714.932.1955
PROJECT#: 20190 10/24/2022





VIEW BOARD
 75% SITE PLAN
 100% AL OF SITE PLAN
 100% WITH CONDITIONS
 Date

SKILLED NURSING FACILITY (PROPOSED) + ASSISTED LIVING (PROPOSED)
BRADLEY TERRACES

SITE DETAILS
 ARCHITECTURE + INTERIORS + PLANNING
 331 NORTH RAMPART STREET SUITE 101
 ORANGE, CA 92668 P: 714.937.1185
 PROJECT#: 20090 10/24/2009





SKILLED NURSING FACILITY (PROPOSED) + ASSISTED LIVING (PROPOSED)
BRADLEY TERRACES

PERSPECTIVE VIEWS - SOUTH

ARCHITECTURE + INTERIORS + PLANNING
321 NORTH RAINBOW STREET SUITE 101
ORANGE, CA 92668 P: 714.957.1185
PROJECT# 20390 10/24/2022





VIEW BOARD
 APPROVAL OF SITE PLAN
 APPROVAL OF SITE PLAN
 APPROVAL WITH CONDITIONS
 APPROVAL

SKILLED NURSING FACILITY (PROPOSED) + ASSISTED LIVING (PROPOSED)

BRADLEY TERRACES

PERSPECTIVE VIEWS - SOUTH EAST

ARCHITECTURE • INTERIORS • PLANNING
 32 NORTH BAHAMPA STREET, SUITE 101
 ORANGE, CA 92668 P: 714.937.1885
 PROJECT# 20206 10/24/2022



PHOTO COURTESY OF THE ARCHITECTURAL FIRM



SKILLED NURSING FACILITY (PROPOSED) + ASSISTED LIVING (PROPOSED)
BRADLEY TERRACES

PERSPECTIVE VIEWS - SITE AXON

ARCHITECTURE + INTERIOR + PLANNING
221 NORTH KAWAIA STREET, SUITE 101
ORANGE, CA 92668 P 714.751.1883
PROJECT# 20200 10/24/2022



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Attachment F – Ownership Disclosure



County of San Diego, Planning & Development Services
APPLICANT'S DISCLOSURE OF OWNERSHIP INTERESTS ON APPLICATION FOR ZONING PERMITS/ APPROVALS
ZONING DIVISION

Record ID(s) _____

Assessor's Parcel Number(s) 387-142-36-00

Ordinance No. 4544 (N.S.) requires that the following information must be disclosed at the time of filing of this discretionary permit. The application shall be signed by all owners of the property subject to the application or the authorized agent(s) of the owner(s), pursuant to Section 7017 of the Zoning Ordinance. NOTE: Attach additional pages if necessary.

A. List the names of all persons having any ownership interest in the property involved.

El Cajon Real Estate, LLC

Blank lines for listing ownership interests.

B. If any person identified pursuant to (A) above is a corporation or partnership, list the names of all individuals owning more than 10% of the shares in the corporation or owning any partnership interest in the partnership.

Thomas Olds, Jr

Fred Smith

Blank lines for listing individuals in corporations or partnerships.

C. If any person identified pursuant to (A) above is a non-profit organization or a trust, list the names of any persons serving as director of the non-profit organization or as trustee or beneficiary or trustor of the trust.

Blank lines for listing persons in non-profit organizations or trusts.

NOTE: Section 1127 of The Zoning Ordinance defines Person as: "Any individual, firm, copartnership, joint venture, association, social club, fraternal organization, corporation, estate, trust, receiver syndicate, this and any other county, city and county, city, municipality, district or other political subdivision, or any other group or combination acting as a unit."

Handwritten signature of Thomas Olds, Jr.

Signature of Applicant

Thomas Olds, Jr.

Print Name

11/29/2021

Date

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SDC PDS RCVD 12-30-21
MUP-85-053W2

