



# County of San Diego

**DAHVIA LYNCH**  
DIRECTOR

PLANNING & DEVELOPMENT SERVICES  
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**VINCE NICOLETTI**  
ASSISTANT DIRECTOR

July 27, 2023

San Diego Crescentwood Services  
4041 Hatton Street  
San Diego, CA 92111

**PROJECT NAME:** Crescentwood Cemetery  
**RECORD ID:** PDS2023-MUP-23-008; **ENVIRONMENTAL LOG NO.:** PDS2023-ER-23-11-001  
**PROJECT ADDRESS:** Old Hwy 80, Pine Valley, CA; **APN:** 608-080-33-00  
**TRUST ACCOUNT NO.:** 2235942-D-10174

## **RE: SCOPING LETTER**

Dear San Diego Crescentwood Services:

Planning & Development Services (PDS) has reviewed your application for a Major Use Permit and is providing you with the attached package of information as a guide for further processing your application.

## **PROJECT DESCRIPTION**

Below is the project description that staff has generated from the information provided in the application package. Please review this project description and verify with staff that the project description is correct:

The project is a Major Use Permit to construct and operate a cemetery. The project consists of a 37.54-acre parcel to be developed into a 15-acre open space easement, and a 16.4-acre burial site with paved internal, circular driveways, a parking lot, a X-sq. ft. storage structure, a x sq. ft. Gazebo, and perimeter fencing. Additionally, 5.85-acres of the parcel will be used for stormwater quality basins and buffers. The cemetery proposes a 38-space parking lot with two additional spaces for buses, a non-illuminated sign (please provide dimensions) would be located at the front entrance gate. The project site is located on a non-addressed parcel off Old Hwy 80 in the Campo/Lake Morena Community Planning area, within unincorporated San Diego County. The site is subject to the General Plan Regional Category Rural, Land Use Designation Rural Lands (RL-40). Zoning for the site is General Rural (S92). The site is currently undeveloped with a single existing well. Access to the site would be provided by a proposed private driveway connecting to Old Hwy 80. The site is not within a sewer district. The project would be served by on-site septic systems and groundwater. No extension of sewer or water

utilities will be required by the project. Earthwork will consist of 21,000 cubic yards of cut and 21,000 cubic yards of fill material.

## PROJECT ISSUES

A Project Issue Checklist (Attachment A) has been prepared that details all issues, revisions or processing requirements that must be completed for this project. **This checklist shall be used by the County and the applicant as a comprehensive list of project issues that must be resolved and revisions that must be completed prior to public review under the California Environmental Quality Act (CEQA), or decision if no circulation of environmental documentation is required pursuant to CEQA.** In response to the Project Issues Checklist, the applicant is expected to include a letter with every submittal made to the Department stating how each item number in the Checklist has been addressed.

## MAJOR PROJECT ISSUES

The following project issue(s) were identified during the project scoping and are further discussed in the attachments to this letter. These issue(s) may require substantial redesign of the proposed project or, if not resolved, would result in a recommendation for project denial by PDS. These issue(s) discussed below, were identified based upon information presently available to the County and are subject to change upon submittal of further information and studies:

- **Campo/Lake Morena Community Planning Group Recommendation:** Planning & Development Services (PDS) strongly recommends coordination with the Campo/Lake Morena Community Planning Group, as the Department will consider comments from applicable community groups in its decision-making process.
- **Department of Environmental Health and Quality:** The proposal to utilize portable restrooms on the site cannot be supported by DEHQ. Permanent facilities with frequent use must have a means of onsite wastewater disposal when sanitary sewer is not available. The applicant would need to submit a design for an onsite wastewater treatment system as part of the proposed project revisions. Based on the proposed use, a minimal onsite wastewater treatment system would be expected for restroom facilities. This system should be a 1000-gallon septic tank with 200' of standard leach line and 100% reserve area. Percolation testing is not required, as the soil conditions in the area are well known.
- **Major Use Permit Findings:** In accordance with Section 7358 of the Zoning Ordinance, before any use permit may be granted or modified, the granting authority must make favorable findings concerning the following factors. You should keep these findings in mind when you are completing the application and preparing your plot plans. Provide a detailed written response to each of the following findings to describe the project's compliance.
  - Harmony in scale, bulk, coverage and density. Describe the physical character of the project and its harmony with zoning regulations and adjacent property.
  - Availability of public facilities, services and utilities. Describe the adequacy of facilities, services and utilities to serve the project. If applicable, include school, fire, police, water, sanitation and electricity/gas.
  - The harmful effect, if any, upon desirable neighborhood character. This finding should describe the surrounding area and the impact of the proposal.

- This finding may include any benefits of the proposal and any mitigating measures such as buffering.
- The generation of traffic and the capacity and physical character of surrounding streets. Describe the adequacy of the streets in relation to the proposal. List and describe the surrounding streets including the number of lanes.
  - The suitability of the site for the type and intensity of use or development which is proposed. Describe the physical characteristics of the site (e.g. level with adequate drainage) and the suitability of the proposal for this particular site.
  - Project findings 1 through 5 and the project location will be consistent with the San Diego County General Plan. Describe how the project's impacts with regard to findings 1 through 5, and the specific site, will be consistent with the County General Plan.
  - The requirements of the California Environmental Quality Act (CEQA) have been complied with. This finding should describe how the project will be in compliance with the requirements of the Environmental Quality Act.
  - <http://www.sandiegocounty.gov/pds/zoning/formfields/PDS-313.pdf>

A Project Scoping Review Meeting has not yet been scheduled with the applicant/owner/consultants to discuss these issues and the potential resolutions.

### **PROJECT ISSUE RESOLUTION PROCESS**

If you have disagreements with the requirements within this letter you should contact the project staff to resolve those issues. Upon discussion with project staff, you may have these issues referred to the Project Issue Resolution process to provide you with an opportunity to quickly and inexpensively have issues considered by senior County management. Issues considered under this procedure can include disagreements with staff interpretations of codes or ordinances, requests for additional information or studies, or disagreements regarding project related processing requirements. Please contact me to learn more about this process, the limitations, or to request an application form.

Also, please be aware that a staff initiated Project Issue Resolution (PIR) meeting will be scheduled if one or more of the following criteria is met:

1. Submittal is inadequate or does not sufficiently address staff's comments; or
2. Identified major project issues remain unresolved; or
3. A review of four or more iterations is necessary.

Note that the Department may make a recommendation for denial of your project to the appropriate decision-making authority based on inadequate progress pursuant to Section 15109 of the CEQA Guidelines if issues remain unresolved after the PIR meeting or the next iteration of submitted documentation is determined to remain inadequate.

### **SECOND OPINION**

A second opinion is available on any interpretation or comment provided within the Scoping Letter and will not affect the level of customer service you receive. We ask you to provide your interpretation of the code along with any health and safety concerns that the interpretation may

cause and how this will affect your project. The second opinion will come from our Chief of Project Planning and Chief of Land Development who will have a chance to take a deeper look at supporting documentation on both sides of the issue. This may occur via an email response or a meeting that will need to be scheduled. Please allow a few days for proper research and understanding of the intent of the code in question. After your second opinion you can always follow up with our Deputy Director for a final opinion.

### **CEQA UPDATE – VEHICLE MILES TRAVELED (VMT)**

Senate Bill (SB) 743 was signed into law on September 27, 2013 and changed the way that public agencies are to evaluate transportation impacts under CEQA. In response, the Governor's Office of Planning and Research updated the CEQA guidelines and recommended that Vehicle Miles Travelled (VMT) be the primary metric for evaluation. In September of 2022, the County Board of Supervisors adopted the Transportation Study Guide (TSG) to comply with SB 743. The new TSG also includes a Local Mobility Analysis (LMA) to assess transportation effects and ensure orderly development, public safety, adequate infrastructure, and consistency with the General Plan. For more information on SB 743 and links to the TSG, see the County's SB 743 webpage here: <https://www.sandiegocounty.gov/content/sdc/pds/SB743.html>

### **ESTIMATE OF DISCRETIONARY PROCESSING COSTS AND SCHEDULE**

An estimate of discretionary processing time and costs that includes several assumptions has been generated for your project and is included in Attachment B. It is estimated that \$160,000-175,000 of County fees and deposits will be required to get the project through to a hearing and/or decision. The estimated hearing/decision date for this project is third/fourth quarter of 2024. Please note that the estimated cost and hearing/decision date is based on certain assumptions detailed in the Attachment and could be more or less than the estimate provided. If the cost and schedule assumptions prove to be incorrect, the estimate will be revised. The estimate includes only the costs to get your present application(s) to hearing/decision.

Should your application be approved, there will be additional processing costs in the future (e.g., Final Map processing costs, park fees, drainage fees, building permit fees). To obtain an estimate of future building permit and plan check fees, parks fees, and Traffic Impact Fees, see <http://www.sdcounty.ca.gov/PDS/bldgforms/index.html#fees>.

Please note that building permits are required to construct, enlarge, alter, repair, move, improve, remove, convert, or demolish a building or structure. Permits are also required for plumbing, electrical, and mechanical work. A permit must be obtained prior to construction and prior to occupancy. Failure to obtain a building permit is a violation of the County of San Diego Ordinances.

### **DEFENSE AND INDEMNIFICATION**

The Board of Supervisors may require a defense and indemnification agreement from the project owner and/or applicant on a case-by-case basis where significant risk to the County is identified in connection with the processing of a discretionary land use development project. The County will notify applicants of the requirement for a defense and indemnification agreement as early in the project processing as possible. Please see the Defense and Indemnification FAQ sheet (<http://www.sdcounty.ca.gov/PDS/docs/ZC001.pdf>) for more information.

## TECHNICAL STUDIES

Please note that preparation of the following studies, if requested, **must be completed by a consultant on the County's CEQA Consultant List for Privately Initiated Projects. The County-approved consultant must be the Principal Investigator for the study.**

Agricultural Resources	Groundwater
Air Quality (including Climate Change)	Historic Resources
Archaeological Resources	Mineral Resources
Biological Resources	Noise
EIR Preparer	Revegetation Planning
Fire Protection Planning	Transportation & Traffic
	Visual Analysis

The list of County-approved consultants is located at:

<https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/CeqaConsultantsList.pdf>

**Any studies completed by consultants not on the County's list will not be accepted.** Should the consultant decide to apply for placement on the County's CEQA Consultant List, their application will be reviewed with the next batch of applications. Batching for the County's CEQA Consultant List typically takes place twice per year. **Application for placement on the County's CEQA Consultant List does not guarantee that a consultant will be listed.**

**A study completed by a consultant not on the County's CEQA Consultant List may not be subsequently checked by a County-approved consultant as a way to avoid compliance with these requirements.**

## DEPARTMENT RECOMMENDATION

Comments and information in this letter, or lack thereof, should not be construed as the Department implying an overall recommendation or decision on your project. Planning & Development Services generally makes a final recommendation or decision to approve or deny a project when all planning analysis and environmental documentation is complete and, if applicable, Planning/Sponsor Group input is received.

## DETERMINATION OF COMPLETENESS

### Completeness Determination – Section 65943 of the Government Code

PDS has completed its initial review of your application and cannot find it complete pursuant to Section 65943 of the Government Code at this time. Please review the attached package of information which will detail how to further process your application.

### Completeness Determination – California Environmental Quality Act (CEQA)

Planning & Development Services has completed its review of your AEIS and determined it not to be "complete" as defined by the CEQA. At this time, additional information will be required to determine your project's potential impacts on the environment and to complete the CEQA Environmental Initial Study.

These reports will be reviewed for technical accuracy and to determine whether a Negative Declaration or Environmental Impact Report will be necessary for your project. Additional copies of the final technical report(s) will be required when your project's environmental documents are circulated for public review. The reasons for this determination and the required information are detailed in the attachments to this letter.

**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.

Additionally, because your project may have an effect on native biological resources, State law requires the payment of a \$2,764.00 (2023 fees) fee to the California Department of Fish and Wildlife for their review of the Mitigated Negative Declaration (Fish and Wildlife Code §711.4) and a \$50 administrative fee to the County Clerk (\$2,814 total). Payment of these fees are required regardless of whether or not the effects on native biological resources are considered to be significant or clearly mitigated. The fee is assessed and due upon filing of the NOD after the final decision for the project. The applicant/Owner is responsible for filing the NOD/NOE, signed by the lead agency. Payment may be made with cash or by check/money order made payable to the "San Diego Recorder/Clerk". American Express, Discover, MasterCard, and Visa Debit card payments are also accepted at the County Administration Center with a \$2.50 surcharge per transaction. The fee will be forwarded to the Department of Fish and Wildlife (Administrative Code Section 362, Article XX). For further guidance refer to the Fish & Wildlife Fee Frequently Asked Questions Sheet at:

<http://www.sdcounty.ca.gov/luegdocs/PDS%20PROCEDURES/REGULATORY%20PLANNING/REFERENCE%20DOCUMENTS/Fish%20and%20Game%20Fee%20FAQs.pdf>

### **RECORDATION OF PERMIT**

Pursuant to the San Diego County Zoning Ordinance Section 7019, Permit Decisions for Administrative Permits, Density Bonus Permits, Site Plans, Use Permits, Variances, Reclamation Plans, or any modifications to these permits 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. The Recordation form, will be provided immediately after the Decision determination for this project and must be signed, notarized with an all-purpose acknowledgement form and returned to PDS at the initiation of the Condition Satisfaction Process, or as otherwise specified. Once received, PDS staff shall have the document recorded at the County Recorder's Office.

### **SUBMITTAL REQUIREMENTS**

Unless other agreements have been made with County staff, you must submit all of the following items concurrently and by the submittal date listed below in order to make adequate progress and to minimize the time and costs in the processing of your application. The submittal must be made to the PDS Zoning Counter at 5510 Overland Avenue, Suite 110, San Diego, CA 92123 and must include the following items:

- a. **A COPY OF THIS LETTER.** The requested information will not be accepted unless accompanied by this letter.
- b. **SUBMIT A LETTER ADDRESSING EACH ITEM IN THE PROJECT ISSUE CHECKLIST (Attachment A), BY REFERENCE NUMBER.** This letter must explain in detail (e.g. description of the revision and location of changes in submitted documents) how every unresolved item has been addressed in the resubmittal package.
- c. The following information and/or document(s) with the requested number of copies as specified. **The Project Number and Environmental Log Number must be clearly and visibly labeled on all submitted documents. All changes to the document(s) must be in strikeout/underline format.**

Information/Document	# of Copies	Electronic Copy on CD/USB Drive	Document Distribution <i>(For Admin Purposes Only)</i>
<b>Note: All PDF files have to be unlocked.</b>			
<b><u>Project Issue Checklist Response Letter</u></b>	1	PDF	J. Roland-Chase (1)
<b><u>Revised Plot Plan</u></b> <ul style="list-style-type: none"> <li>• Plans must be folded to 8-1/2 x 11 maximum with the lower right hand corner exposed</li> <li>• If multiple pages, sheets must be stapled together.</li> </ul>	1	PDF	PPCC for Distribution
<b><u>Grant Deed for evidence of Legal Lot</u></b>	1	PDF	J. Roland-Chase (1)
<b><u>Conceptual Landscape Plan</u></b>	2	PDF	J. Roland-Chase (1), Landscape Architect (1)
<b><u>Revised Preliminary Grading Plan (with Supporting Information )</u></b>	2	PDF	J. Roland-Chase (1), LD (1)
<b><u>Title Report with color coded easement exhibit</u></b>	2	PDF	J. Roland-Chase (1), LD (1)
<b><u>Revised Air Quality &amp; GHG Report</u></b>	2	PDF and Word	J. Roland-Chase (1), Air Quality Specialist (1)
<b><u>Revised Biological Resource Report</u></b>	2	PDF and Word	J. Roland-Chase (1), Biologist (1)

<b>Information/Document</b>	<b># of Copies</b>	<b>Electronic Copy on CD/USB Drive</b>	<b>Document Distribution</b> <i>(For Admin Purposes Only)</i>
<b><u>Revised Archaeological Resource Report</u></b>	2	PDF and Word	Jae Roland-Chase (1), Staff Archaeologist (1)
<b><u>Revised Fire Protection Plan</u></b>	2	PDF and Word	J. Roland-Chase (1), Fire Services Coordinator (1)
<b><u>Revised Stormwater Management Plan for Priority Development Projects</u></b>	2	PDF	J. Roland-Chase (1), LD (1)
<b><u>Revised Drainage Study</u></b>	2	PDF	J. Roland-Chase (1), LD (1)
<b><u>Sight Distance Study</u></b>	2	PDF	J. Roland-Chase (1), LD (1)
<b><u>Groundwater Investigation</u></b>	2	PDF and Word	J. Roland-Chase (1), Groundwater Geologist (1)
<b><u>Hydrology &amp; Water Quality Report</u></b>	3	PDF and Word	J. Roland-Chase (1), Groundwater Geologist (1), DEHQ (1)
<b><u>Noise Technical Memo</u></b>	2	PDF and Word	J. Roland-Chase (1), Noise Specialist (1)
<b><u>Memorandum(s) of Understanding according to Attachment C</u></b> (Air Quality, Biology, Cultural, Fire, Groundwater, Noise)	1 copy for each Subject Area	PDF	J. Roland-Chase (1)
The staff turnaround goal for review of the requested information/document is 30 days.			

\*Please contact me in advance for a Special Handling Form if you wish to submit other documents not specifically listed above.

d. Deposits:

<b>TRUST ACCOUNT ID#: 2235942-D-10174</b>	
<b>DEPARTMENT</b>	<b>DEPOSIT AMOUNT</b>
PDS	\$15,000
<b>TOTAL DEPOSITS &amp; FEES:</b>	<b>\$15,000</b>

\* Refer to the attached "Estimate of Discretionary Processing Time and Cost" for a complete estimate of project costs through hearing /decision.



**SUBMITTAL DUE DATE:** In order to maintain adequate progress and be consistent with the Estimate of Discretionary Processing Time and Cost (attached), PDS recommends that all of the information requested in this letter be submitted by **September 27, 2023**. If you are unable to submit the requested information by the above date, please contact your PDS Project Manager to submit a due date extension notification. Notification must be submitted in writing and be signed and dated by the project applicant. The notification must include a revised submittal date and a brief rationale for the extension.

The Department’s goal is to help facilitate the efficient and timely processing of each application. If, however, a project becomes delayed due to excessive project inactivity or account deficit, Board Policy I-137 will apply; please refer to the Board Policy I-137 at <http://www.co.san-diego.ca.us/cob/docs/policy/I-137.pdf> and the FAQ sheet at <http://www.sdcounty.ca.gov/PDS/docs/907.pdf> for the Processing of Inactive and Deficit Projects.

If you have any questions regarding this letter or other aspects of your project, please contact me at (619) 380-3130.

Sincerely,



Jae Roland-Chase, Project Manager  
Project Planning Division

cc: SD Crescentwood Services, board@sacws.org  
Steve Wragg, Michael Baker International, swragg@mbakerintl.com

email cc:  
Edwin Sinsay, Land Development, Team Leader, Planning & Development Services  
Michael Johnson, Planning Manager, Planning & Development Services  
Lake Morena/Campo Planning/Sponsor Group

**SCOPING LETTER MATRIX**

Attachment	Item
A	Project Issue Checklist
B	<a href="#">Estimate of Discretionary Processing Time and Cost</a>
C	<a href="#">Memorandum(s) of Understanding</a>
D	NOISE
E	GROUNDWATER RESOURCES
F	CULTURAL RESOURCES & DRAFT CONDITIONS
G	DEPARTMENT OF ENVIRONMENTAL HEALTH & QUALITY
H	HYDROLOGY & WATER QUALITY
I	AIR QUALITY REPORT WITH COMMENTS

<b>J</b>	<b>BIOLOGICAL RESOURCES REPORT WITH COMMENTS</b>
<b>K</b>	<b>CAMPO/LAKE MORENA CPG LETTER WITH COMMENTS</b>

## **ATTACHMENT A PROJECT ISSUE CHECKLIST**

The Project Issue Checklist that follows details the specific changes and comments that are required to proceed with your project application. This checklist will be used throughout the process to track requests for information and satisfaction of project requirements.

Please note that the resubmittal of requested information must be accompanied by a separate letter addressing each item in the Project Issue Checklist. The letter must explain in detail how the comment was addressed and where (e.g. in what documents, where on the map/plot plan, etc.). County staff will use this letter to verify whether each comment in the checklist has been adequately addressed. If you have any questions about any of the comments in the checklist, please contact your project manager.

### **TECHNICAL STUDIES**

Please note that preparation of the following studies, if requested, **must be completed by a consultant on the County's CEQA Consultant List for Privately Initiated Projects. The County-approved consultant must be the Principal Investigator for the study.**

Agricultural Resources	Groundwater
Air Quality (including Climate Change)	Historic Resources
Archaeological Resources	Mineral Resources
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EIR Preparer	Revegetation Planning
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The list of County-approved consultants is located at:

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**Any studies completed by consultants not on the County's list will not be accepted.** Should the consultant decide to apply for placement on the County's CEQA Consultant List, their application will be reviewed with the next batch of applications. Batching for the County's CEQA Consultant List typically takes place twice per year. **Application for placement on the County's CEQA Consultant List does not guarantee that a consultant will be listed.**

**A study completed by a consultant not on the County's CEQA Consultant List may not be subsequently checked by a County-approved consultant as a way to avoid compliance with these requirements.**

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

<b>PROJECT NAME: Crescentwood Cemetery</b>		<b>Project Number(s): PDS2023-MUP-23-008</b>			
<b>Planning &amp; Development Services (PDS) Planning and CEQA Comments</b>					
<b>Item No.</b>	<b>Subject Area</b>	<b>Issue, Revision or Information Required</b>	<b>Issue Resolution Summary (Include Conditions)</b>	<b>Date Identified</b>	<b>Date Resolved</b>
1- 1	Project Description	The project is a Major Use Permit to construct and operate a cemetery. The project consists of a 37.54-acre parcel to be developed into a 15-acre open space easement, and a 16.4-acre burial site with paved internal, circular driveways, a parking lot, a X-sq. ft. storage structure, a x sq. ft. Gazebo, and perimeter fencing. Additionally, 5.85-acres of the parcel will be used for stormwater quality basins and buffers. The cemetery proposes a 38-space parking lot with two additional spaces for buses, a non-illuminated sign (please provide dimensions) would be located at the front entrance gate. The project site is located on a non-addressed parcel off Old Hwy 80 in the Campo/Lake Morena Community Planning area, within unincorporated San Diego County. The site is subject to the General Plan Regional Category Rural, Land Use Designation Rural Lands (RL-40). Zoning for the site is General Rural (S92). The site is currently undeveloped with a single existing well. Access to the site would be provided by a proposed private driveway connecting to Old Hwy 80. The site is not within a sewer district. The project would be served by on-site septic systems and groundwater. No extension of sewer or water utilities will be required by the project. Earthwork will consist of 21,000 cubic yards of cut and 21,000 cubic yards of fill material.	Please review for accuracy and fill in requested details	7/24/23	
1- 2	Project Description	Please provide a response to the question of number of burials per month. The CPG has included concerns that the number of 4/month and 350/year are in conflict.		7/24/23	
1- 3	Project Description	Please confirm that the submitted plans to the County are the entirety of the project plans at this time. The CPG has included concerns that there may be plans in the future not included in those provided to the County.		7/24/23	
2- 1	Legal Lot	In accordance to Policy G-3, please provide a grant deed dated prior to February 1, 1972 as evidence of legal lot.		7/24/23	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

<b>PROJECT NAME: Crescentwood Cemetery</b>		<b>Project Number(s): PDS2023-MUP-23-008</b>			
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3- 1	Determination of Completeness	<p><b>DETERMINATION OF INCOMPLETENESS</b> Completeness Determination – Section 65943 of the Government Code PDS has reviewed your application and has determined that it is incomplete pursuant to Section 65943 of the Government Code. Staff will continue to work with you on outstanding items.</p> <p>Completeness Determination – California Environmental Quality Act (CEQA) Planning &amp; Development Services has completed its review of your application and determined it not to be “complete” as defined by the CEQA. At this time, additional information will be required to determine your project’s potential impacts on the environment and to complete the CEQA Environmental Initial Study.</p>		7/24/23	
4- 1	Campo/Lake Morena Community Planning Group	This property is located within the Campo/Lake Morena Community Planning Group (CPG) boundaries. A recommendation from the CPG is required prior to hearing. It is recommended that you work with the CPG early on in the process. Please contact the Campo/Lake Morena Community Planning Group to get on the agenda and receive a recommendation.		7/24/23	
4- 2	Campo/Lake Morena Community Planning Group	The Campo/Lake Morena Community Planning Group contact information is as followed: Chair: Billie Jo Jannen Email: campoplanninggroup@nym.hush.com Phone:619-415-6298		7/24/23	
5- 1	Major Project Issues: Campo/Lake Morena CPG Recommendation	Planning & Development Services (PDS) strongly recommends coordination with the Campo/Lake Morena Community Planning Group, as the Department will consider comments from applicable community groups in its decision-making process		7/24/23	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

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5- 2	Major Project Issues: Department of Environmental Health and Quality	The proposal to utilize portable restrooms on the site cannot be supported by DEHQ. Permanent facilities with frequent use must have a means of onsite wastewater disposal when sanitary sewer is not available. The applicant would need to submit a design for an onsite wastewater treatment system as part of the proposed project revisions. Based on the proposed use, a minimal onsite wastewater treatment system would be expected for restroom facilities. This system should be a 1000-gallon septic tank with 200' of standard leach line and 100% reserve area. Percolation testing is not required, as the soil conditions in the area are well known.		7/24/23	
5- 3	Major Project Issues - Major Use Permit Findings	In accordance with Section 7358 of the Zoning Ordinance, before any use permit may be granted or modified, the granting authority must make favorable findings concerning the following factors. You should keep these findings in mind when you are completing the application and preparing your plot plans. Provide a detailed written response to each of the following findings to describe the project's compliance.		7/24/23	
5- 4	Major Project Issues - Major Use Permit Findings	Harmony in scale, bulk, coverage and density. Describe the physical character of the project and its harmony with zoning regulations and adjacent property.		7/24/23	
5- 5	Major Project Issues - Major Use Permit Findings	Availability of public facilities, services and utilities. Describe the adequacy of facilities, services and utilities to serve the project. If applicable, include school, fire, police, water, sanitation and electricity/gas.		7/24/23	
5- 6	Major Project Issues - Major Use Permit Findings	The harmful effect, if any, upon desirable neighborhood character. This finding should describe the surrounding area and the impact of the proposal. This finding may include any benefits of the proposal and any mitigating measures such as buffering.		7/24/23	
5- 7	Major Project Issues - Major Use Permit Findings	The generation of traffic and the capacity and physical character of surrounding streets. Describe the adequacy of the streets in relation to the proposal. List and describe the surrounding streets including the number of lanes.		7/24/23	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

PROJECT NAME: Crescentwood Cemetery		Project Number(s): PDS2023-MUP-23-008			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
5- 8	Major Project Issues - Major Use Permit Findings	The suitability of the site for the type and intensity of use or development which is proposed. Describe the physical characteristics of the site (e.g. level with adequate drainage) and the suitability of the proposal for this particular site.		7/24/23	
5- 9	Major Project Issues - Major Use Permit Findings	Project findings 1 through 5 and the project location will be consistent with the San Diego County General Plan. Describe how the project's impacts with regard to findings 1 through 5, and the specific site, will be consistent with the County General Plan.		7/24/23	
5- 10	Major Project Issues - Major Use Permit Findings	The requirements of the California Environmental Quality Act (CEQA) have been complied with. This finding should describe how the project will be in compliance with the requirements of the Environmental Quality Act.		7/24/23	
5- 11	Major Project Issues - Major Use Permit Findings	<a href="http://www.sandiegocounty.gov/pds/zoning/formfields/PDS-313.pdf">http://www.sandiegocounty.gov/pds/zoning/formfields/PDS-313.pdf</a>		7/24/23	
6- 1	General Plan Conformance	The proposed project must comply with the County of San Diego General Plan, Zoning Ordinance, and the Campo/Lake Morena Community Plan Guidelines. Please provide an explanation of consistency with each of the following General Plan and Community Plan policies.	<b>Informational. Please provide a short explanation of how your project complies with these policies.</b>	7/24/2023	7/24/2023
6- 2	General Plan Conformance	<b>LU-2.8 Mitigation of Development Impacts.</b> 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.		7/24/23	
6- 3	General Plan Conformance	<b>LU-5.3 Rural Land Preservation.</b> Ensure the preservation of existing open space and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) when permitting development under the Rural and Semi Rural Land Use Designations. <i>Open space and rural lands are primary areas that provide carbon sequestration benefits for the Region.</i>		7/24/23	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

<b>PROJECT NAME: Crescentwood Cemetery</b>		<b>Project Number(s): PDS2023-MUP-23-008</b>			
<b>Planning &amp; Development Services (PDS) Planning and CEQA Comments</b>					
<b>Item No.</b>	<b>Subject Area</b>	<b>Issue, Revision or Information Required</b>	<b>Issue Resolution Summary (Include Conditions)</b>	<b>Date Identified</b>	<b>Date Resolved</b>
6- 4	General Plan Conformance	<b>LU-6.1 Environmental Sustainability.</b> Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment.		7/24/23	
6- 5	General Plan Conformance	<b>LU-6.5 Sustainable Stormwater Management.</b> Ensure that development minimizes the use of impervious surfaces and incorporates other Low Impact Development techniques as well as a combination of site design, source control, and stormwater best management practices, where applicable and consistent with the County's LID Handbook.		7/24/23	
6- 6	General Plan Conformance	<b>LU-6.6 Integration of Natural Features into Project Design.</b> Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources.		7/24/23	
6- 7	General Plan Conformance	<b>LU-6.8 Oversight of Open Space.</b> Require that open space associated with future development that is intended to be preserved in perpetuity either be: 1) Retained in private ownership of the property owner or a third party with a restrictive easement that limits use of the land as appropriate; or 2) Transferred into public ownership of an agency that manages preserved open space. The owner of the open space will be responsible for the maintenance and any necessary management unless those responsibilities are delegated through an adopted plan or agreement. Restrictive easements shall be dedicated to the County or a public agency (approved by the County) with responsibilities that correspond with the purpose of the open space. When transferred to a third party or public agency, a funding mechanism to support the future maintenance and management of the property should be established to the satisfaction of the County.		7/24/23	



**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

**PROJECT NAME: Crescentwood Cemetery** **Project Number(s): PDS2023-MUP-23-008**

Planning & Development Services (PDS) Planning and CEQA Comments

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
6- 8	General Plan Conformance	<b>LU-6.9 Development Conformance with Topography.</b> Require development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage and topography in conveying stormwater to the maximum extent practicable.		7/24/23	
6- 9	General Plan Conformance	<b>LU-8.2 Groundwater Resources.</b> Require development to identify adequate groundwater resources in groundwater dependent areas, as follows: <ul style="list-style-type: none"> <li>■ In areas dependent on currently identified groundwater overdrafted basins, prohibit new development from exacerbating overdraft conditions. Encourage programs to alleviate overdraft conditions in Borrego Valley.</li> <li>■ In areas without current overdraft groundwater conditions, evaluate new groundwater-dependent development to assure a sustainable long-term supply of groundwater is available that will not adversely impact existing groundwater users.</li> </ul> <i>A groundwater basin is considered in an overdraft condition when, during average conditions over a number of years, the amount of water being withdrawn from the basin exceeds the amount of water that recharges the basin.</i>		7/24/23	
6- 10	General Plan Conformance	<b>LU-10.2 Development—Environmental Resource Relationship.</b> Require development in Semi-Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas.		7/24/23	
6- 11	General Plan Conformance	<b>LU-14.5 Alternate Sewage Disposal Systems.</b> Support the use of alternative on-site sewage disposal systems when conventional systems are not feasible and in conformance with State guidelines and regulations.		7/24/23	
6- 12	General Plan Conformance	<b>M-10.1 Parking Capacity.</b> Require new development to: <ul style="list-style-type: none"> <li>■ Provide sufficient parking capacity for motor vehicles consistent with the project's location, use, and intensity</li> <li>■ Provide parking facilities for motorcycles and bicycles</li> <li>■ Provide staging areas for regional and community trails</li> </ul>		7/24/23	

**ATTACHMENT A**  
**PROJECT ISSUE CHECKLIST**

PROJECT NAME: Crescentwood Cemetery		Project Number(s): PDS2023-MUP-23-008			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
6- 13	General Plan Conformance	<b>M-12.4 Land Dedication for Trails.</b> Require development projects to dedicate and improve trails or pathways where the development will occur on land planned for trail or pathway segments shown on the Regional Trails Plan or Community Trails Master Plan.		7/24/23	
6- 14	General Plan Conformance	<b>COS-2.1 Protection, Restoration and Enhancement.</b> Protect and enhance natural wildlife habitat outside of preserves as development occurs according to the underlying land use designation. Limit the degradation of regionally important natural habitats within the Semi-Rural and Rural Lands regional categories, as well as within Village lands where appropriate. <i>The preservation of existing native plants and the planting of a variety of native (genetically locally adapted) or compatible non native, non invasive plant species enhance wildlife habitat areas.</i>		7/24/23	
6- 15	General Plan Conformance	<b>COS-2.2 Habitat Protection Through Site Design.</b> Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design.		7/24/23	
6- 16	General Plan Conformance	<b>COS-13.1 Restrict Light and Glare.</b> Restrict outdoor light and glare from development projects in Semi-Rural and Rural Lands and designated rural communities to retain the quality of night skies by minimizing light pollution.		7/24/23	
6- 17	General Plan Conformance	<b>S-3.1 Defensible Development.</b> Require development to be located, designed, and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires.		7/24/23	
7- 1	Campo/Lake Morena Community Plan	The proposed project must comply with the Campo/Lake Morena Community Plan Guidelines. Please provide an explanation of consistency with each of the following Community Plan policies.	<b>Informational. Please provide a short explanation of how your project complies with these policies.</b>	7/24/2023	7/24/2023
7- 2	Campo/Lake Morena Community Plan	Policy LU 4.3.1 Encourage developers and owners of large parcels to conserve open space viewsheds and ranchland as part of their development proposals.		7/24/23	
7- 3	Campo/Lake Morena Community Plan	Policy LU 5.1.2 Minimize the visual impacts of buildings and water storage tanks, and have them set back with screening vegetation to shield structures, if possible.		7/24/23	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

<b>PROJECT NAME: Crescentwood Cemetery</b>		<b>Project Number(s): PDS2023-MUP-23-008</b>			
<b>Planning &amp; Development Services (PDS) Planning and CEQA Comments</b>					
<b>Item No.</b>	<b>Subject Area</b>	<b>Issue, Revision or Information Required</b>	<b>Issue Resolution Summary (Include Conditions)</b>	<b>Date Identified</b>	<b>Date Resolved</b>
7- 4	Campo/Lake Morena Community Plan	Goal LU 5.2.Manage groundwater resources to ensure adequate recharge and future supplies for residents, wildlife, and vegetation.		7/24/23	
7- 5	Campo/Lake Morena Community Plan	Goal LU 5.3.1 Ensure that proposed new developments conduct thorough tests to ensure that the groundwater will not be overdrafted or contaminated for present or future generations.		7/24/23	
7- 6	Campo/Lake Morena Community Plan	Policy LU 5.3.1.2 Require tests to ensure that groundwater will not be over-drafted or contaminated. Ensure that water quality testing includes testing for radionuclides and that the safety standards are met.		7/24/23	
7- 7	Campo/Lake Morena Community Plan	Policy LU 5.3.1.3 Require environmental documents under the California Environmental Quality Act to use the latest available rainfall information in groundwater studies, concurrent with the Notice of Preparation or initiation of the Initial Study		7/24/23	
7- 8	Campo/Lake Morena Community Plan	Policy CM 1.1.1 Encourage trail creation and development through open space and ranch easements and MSCP lands where trails would promote desired connectivity and offer the opportunity for public enjoyment of rural and wild areas.		7/24/23	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

<b>PROJECT NAME: Crescentwood Cemetery</b>		<b>Project Number(s): PDS2023-MUP-23-008</b>			
<b>Planning &amp; Development Services (PDS) Planning and CEQA Comments</b>					
<b>Item No.</b>	<b>Subject Area</b>	<b>Issue, Revision or Information Required</b>	<b>Issue Resolution Summary (Include Conditions)</b>	<b>Date Identified</b>	<b>Date Resolved</b>
8- 1	Zoning Ordinance	ZO Section 1350 MAJOR IMPACT SERVICES AND UTILITIES. The Major Impact Services and Utilities use type refers to public or private services and utilities which have substantial impact. Such uses may be conditionally permitted in any zone when the public interest supersedes the usual limitations placed on land use and transcends the usual restraints of zoning for reasons of necessary location and community wide interest. Typical places or uses are schools, sanitary landfills, public and private airports, public park/playground/recreational areas (other than public passive park/recreational areas), hospitals, psychiatric facilities, cemeteries, nursing homes, detention and correction institutions, trade schools (with outdoor training facilities) or security, law enforcement, military, paramilitary type training facilities, or field medical training uses. Public park/ playground/recreational areas (other than public passive park/recreational areas) shall not apply to those uses within the Coastal Zone (refer to County Park).	Informational	7/24/2023	7/24/2023
8- 2	Zoning Ordinance	ZO Section 6901 CEMETERIES (b) Additional Standards for Cemeteries. Before any Major Use Permit for a cemetery may be granted or modified, in addition to the findings required by Section 7358, it shall be found, based upon a financial statement of the applicant and such measures or programs as the applicant may propose, that the cemetery will be established, cared for and maintained in such a manner as to prevent the same from becoming a public nuisance.	Additional findings required for cemeteries. Please provide a statement for how your project will comply with this ZO requirement.	7/24/23	
8- 3	Zoning Ordinance	The property is zoned as General Rural (S92). It is subject to Section 2920 of the Zoning Ordinance.	Informational	7/24/2023	7/24/2023
8- 4	Zoning Ordinance	Major Use permits are subject to zoning ordinance section 7350.	Informational	7/24/2023	7/24/2023

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

<b>PROJECT NAME: Crescentwood Cemetery</b>		<b>Project Number(s): PDS2023-MUP-23-008</b>			
<b>Planning &amp; Development Services (PDS) Planning and CEQA Comments</b>					
<b>Item No.</b>	<b>Subject Area</b>	<b>Issue, Revision or Information Required</b>	<b>Issue Resolution Summary (Include Conditions)</b>	<b>Date Identified</b>	<b>Date Resolved</b>
8- 5	Zoning Ordinance	Zoning ordinance section 7350 "Findings Required outlines specific findings must be made prior to a permit being granted. These include: * Location, size, design and operating characteristics, considering: / Harmony in scale, bulk, coverage and density; / Availability of public facilities, services and utilities; / Effects on desirable neighborhood character; / Traffic generation, capacity and physical character of surrounding streets; / Suitability of site for proposed project: and / Other relevant impacts of proposed use. * Project impacts; and * Compliance with CEQA.	Informational	7/24/2023	7/24/2023
8- 6	Zoning Ordinance	The project has an Animal Designation of "W." The project does not propose any animal uses as part of the Cemetery.	Informational	7/24/2023	7/24/2023
8- 7	Zoning Ordinance	The project has a Building Type Designation of "C." This is subject to zoning ordinance section 4300.	Informational	7/24/2023	7/24/2023
8- 8	Zoning Ordinance	The project has a Height Designation of "G." This is subject to zoning ordinance section 4600. Structures could not exceed 35' or two stories.	Informational	7/24/2023	7/24/2023
8- 9	Zoning Ordinance	The project has a Setback Designation of "D." This is subject to zoning ordinance section 4800. FY:60(q)', IS:15', ES: 35' and RY: 25'.	Informational	7/24/2023	7/24/2023
9- 1	Plot Plan	Please remove the address of 35252 Old Hwy 80 as the project address.		7/24/23	
9- 2	Plot Plan	Show the footprint of all proposed (new), as-built (non-permitted), and existing (permitted) structures to scale, and labeled as either "Proposed", "As-Built", or "Existing" (do not show "Future" structures). Gazebo, water tank, and storage building should be labelled per instructions on PDS-090 Minimum Plot Plan Information.		7/24/23	
9- 3	Plot Plan	Identify the use of each structure and include a summary/table of square footages and show location of all existing and proposed electrical services (including size).		7/24/23	
9- 4	Plot Plan	Please clearly indicate the centerline of Old Hwy 80.		7/24/23	
10- 1	Title Report	Please provide a title report.		7/24/23	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

<b>PROJECT NAME: Crescentwood Cemetery</b>		<b>Project Number(s): PDS2023-MUP-23-008</b>			
<b>Planning &amp; Development Services (PDS) Planning and CEQA Comments</b>					
<b>Item No.</b>	<b>Subject Area</b>	<b>Issue, Revision or Information Required</b>	<b>Issue Resolution Summary (Include Conditions)</b>	<b>Date Identified</b>	<b>Date Resolved</b>
11- 1	Easement Exhibit	Please provide a separate, full color easement exhibit.		7/24/23	
12- 1	Air Quality	Please see comments included in Air Quality/Greenhouse Gas Emission Report provided separately.		7/24/23	
13- 1	Biological Resources	Please see comment included in Biological Resources Report provided separately.		7/24/23	
14- 1	Cultural Resources	A cultural study titled, "Archaeological Technical Report – Crescent Cemetery Project, PDS2023-MUP-23-008" (February 2023) prepared by Michael De Giovine et.al. was submitted and has been reviewed. Revisions to the study are required. Please address comments and revisions provided in the Word document. Provide an executed MOU with the next submission.		7/24/23	
14- 2	Cultural Resources	County staff will conduct outreach with the Native American communities for the purpose of AB-52 consultation, if required. The intent of Native American consultation is to allow tribes an opportunity to participate in local land use decisions at an early planning stage for the purpose of protecting or mitigating impacts to Native American cultural resources.	Informational	7/24/2023	7/24/2023
14- 3	Cultural Resources	The Memorandum of Understanding must be executed by the applicant and consultant and subsequently submitted with the next iteration review.		7/24/23	
15- 1	Paleontological Resources	County records have been reviewed and it has been determined that the project site has soils that have no potential to contain fossils. As such, a paleontological monitoring program will not be required.	Informational	7/24/2023	7/24/2023
16- 1	Fire	Please include the entire project number "PDS2023-MUP-23-008" on the Title page.		7/24/23	
16- 2	Fire	Change the PDS Contact to Jae Roland-Chase.		7/24/23	
16- 3	Fire	On pages 1, 6, 36 and 37 change the year of the County's Consolidated Fire Code from 2020 to 2023.		7/24/23	
16- 4	Fire	On page 32, section 4.1.1, please edit the first sentence of the 3rd paragraph. We no longer have volunteer departments.		7/24/23	
16- 5	Fire	On page 37, section 5.1.2, last sentence is missing the word "Old" in the road name.		7/24/23	
16- 6	Fire	On pages 39 through 39-41, add a discussion of the FMZ around the storage building, which should be 100 feet.		7/24/23	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

<b>PROJECT NAME: Crescentwood Cemetery</b>		<b>Project Number(s): PDS2023-MUP-23-008</b>			
<b>Planning &amp; Development Services (PDS) Planning and CEQA Comments</b>					
<b>Item No.</b>	<b>Subject Area</b>	<b>Issue, Revision or Information Required</b>	<b>Issue Resolution Summary (Include Conditions)</b>	<b>Date Identified</b>	<b>Date Resolved</b>
16- 7	Fire	On page 42, section 5.4.7 delete the words "up to" in the 2nd sentence.		7/24/23	
16- 8	Fire	On page 46, 3rd paragraph need to be revised as there will be no Fire Services and Mitigation Agreement on this project as it is within the required travel time from a station.		7/24/23	
16- 9	Fire	On page 46, there shall be a list of mitigation measures listed (defensible space, vegetation management, road widths, knox box, building code compliance, etc.).		7/24/23	
16- 10	Fire	On page 46 after the list of mitigation measures, there shall be a concluding statement that with the implementation of these mitigation measures the project results in a less than significant impact.		7/24/23	
16- 11	Fire	Any questions on the above comments, contact David Sibbet at david.sibbet@sdcounty.ca.gov	Information only	7/24/2023	7/24/2023
17- 1	Groundwater Resources	Please see requirements in Attachment E in the Scoping letter.		7/24/23	
18- 1	Hydrology and Water Quality	A Technical Memorandum shall be prepared by a California Professional Geologist to evaluate the risk of necroleachate impacting groundwater resources. The risk screening will make an initial determination as to the following California Environmental Quality Act (CEQA) question: X. HYDROLOGY AND WATER QUALITY: a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? The Technical Memorandum shall include the following:		7/24/23	
18- 2	Hydrology and Water Quality	Bacteria/Viruses, Nitrate and Ammonium Loading Study: a water loading study that looks at the cumulative load at buildout of the cemetery, using a mass balance method, to determine whether the load from the project has the potential to cause the concentration of in-ground water to exceed applicable groundwater quality objectives/primary drinking water standards.		7/24/23	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

<b>PROJECT NAME: Crescentwood Cemetery</b>		<b>Project Number(s): PDS2023-MUP-23-008</b>			
<b>Planning &amp; Development Services (PDS) Planning and CEQA Comments</b>					
<b>Item No.</b>	<b>Subject Area</b>	<b>Issue, Revision or Information Required</b>	<b>Issue Resolution Summary (Include Conditions)</b>	<b>Date Identified</b>	<b>Date Resolved</b>
18- 3	Hydrology and Water Quality	Risk Screening Evaluation: using soil type, lithology type, rock type (secondary porosity of fractures), depth to groundwater, flow mechanism, and distance to sensitive receptors (production wells, surface water bodies), evaluate the relative risk of necroleachate impacting groundwater resources. The risk of being sited atop of a fractured rock aquifer should be taken into consideration given the potential for fractures to transport contaminants. Rock outcrops documented on the grading plan indicate the fractured rock may be at land surface within portions of the project footprint.		7/24/23	
18- 4	Hydrology and Water Quality	Cemetery Setback Distances: an evaluation and recommendation of an appropriate setback distance to nearest sensitive receptors shall be included, taking into consideration (1) the loading study/risk screening evaluation and (2) setback guidance from California (including local municipalities), other states, and pertinent international locales. One source to use to aid in the evaluation of setbacks: Hydrogeological Cemetery Setback Criteria Assessment for Stafford County, Virginia, prepared by ECS Mid-Atlantic, LLC dated July 2020. If the recommended setback encroaches into the cemetery footprint, mitigation may include redesign of the cemetery footprint to ensure setback requirements are met to the nearest identified sensitive receptor(s).		7/24/23	
18- 5	Hydrology and Water Quality	Vertical Separation from Groundwater: an evaluation of the bottom of anticipated gravesites to highest historic groundwater elevation shall be performed to ensure there is adequate vertical separation. It is recommended to use a 5-foot minimum separation requirement.		7/24/23	
18- 6	Hydrology and Water Quality	The Technical Memorandum shall provide a recommendation regarding potential additional work needed to address the CEQA determination and appropriate monitoring and mitigation, if necessary.		7/24/23	
18- 7	Hydrology and Water Quality	Please contact Scott Rosecrans (phone: 619-208-0337 email: scott.rosecrans@sdcounty.ca.gov) or Jim Bennett (phone: 619-346-1476 email: jim.bennett@sdcounty.ca.gov) or if you have any questions regarding these comments.		7/24/23	



**ATTACHMENT A**  
**PROJECT ISSUE CHECKLIST**

<b>PROJECT NAME: Crescentwood Cemetery</b>		<b>Project Number(s): PDS2023-MUP-23-008</b>			
<b>Planning &amp; Development Services (PDS) Planning and CEQA Comments</b>					
<b>Item No.</b>	<b>Subject Area</b>	<b>Issue, Revision or Information Required</b>	<b>Issue Resolution Summary (Include Conditions)</b>	<b>Date Identified</b>	<b>Date Resolved</b>
19- 1	Noise	A noise technical memo has been requested as detailed in Attachment D.		7/24/23	
20- 1	Landscape	A conceptual landscape plan is required. Please provide a conceptual landscape package with the next submittal.		7/24/23	
20- 2	Landscape	Per County Parking Design Manual, every parking space should be within 30ft of a tree to provide heat relief and for screening purposes.		7/24/23	
20- 3	Landscape	Per County Parking Design Manual, a minimum of 14 sq ft of landscape per parking space is required for screening and parking lot planters. 38 parking spaces are currently shown on plans, a minimum landscape of 532 sq ft is required.		7/24/23	
20- 4	Landscape	Per ADA standards, identify on the plans the location of an Accessible Path from ADA parking spaces.		7/24/23	
20- 5	Landscape	All proposed parking shall provide wheel stops and landscape screening per the Parking Design Manual and Figures 6792.4 (wheel stops) and 6792.5 (landscape requirements) within Section 6792 of the Zoning Ordinance.		7/24/23	
20- 6	Landscape	Manufactured slopes shall match the grading plans in configuration and layout. All slopes shall be protected from soil erosion and planted per Section 87.417 of the Grading Ordinance. Slopes over 15' in vertical height shall provide container stock in addition to groundcovers.		7/24/23	
20- 7	Landscape	Indicate how the biofiltration basins will be planted.		7/24/23	
20- 8	Landscape	Cemeteries shall limit the use of turf to only those areas necessary for the operation of the facility. If burial sites are to be turfed, please show the location of these areas and provide other drought tolerant plantings outside of these sites.		7/24/23	
20- 9	Landscape	If the project will be phased, show phasing and indicate what form of planting to prevent soil erosion will be used for areas that will be constructed in subsequent phases.		7/24/23	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

<b>PROJECT NAME: Crescentwood Cemetery</b>		<b>Project Number(s): PDS2023-MUP-23-008</b>			
<b>Planning &amp; Development Services (PDS) Planning and CEQA Comments</b>					
<b>Item No.</b>	<b>Subject Area</b>	<b>Issue, Revision or Information Required</b>	<b>Issue Resolution Summary (Include Conditions)</b>	<b>Date Identified</b>	<b>Date Resolved</b>
20- 10	Landscape	For compliance with water budget calculations described in Section 86.717 (b) of the Ordinance, please note that Measure W-1.2 (Reduce Outdoor Water Use) of the County's Climate Action Plan will now require an ETAF value of 0.42 to be used within the MAWA formula. Although water budget calculations are not required for final landscape plans for those properties utilizing groundwater, these calculations will be required during review of the conceptual landscape plan if a groundwater study is required of the project as a whole.		7/24/23	
20- 11	Landscape	In conjunction with slopes associated with construction of the road network, show access points to grave sites and if temporary parking areas will be provided.		7/24/23	
21- 1	DEH	Please see requirements in Attachment H in the Scoping letter.		7/24/23	
22- 1	Traffic	The proposed project will generate 82 Average Daily Trips (ADT) based on SANDAG trip generation rates. The County's adopted Transportation Study Guide (TSG) states that any project that generates less than 110 ADT is considered a small project and has a less than significant impact for transportation. Furthermore, a Local Mobility Analysis that analyzes roadway operations near the project site is not required based on the projects ADT. No further transportation analysis is required.	Informational	7/24/2023	7/24/2023
22- 2	Traffic	Given that the threshold for less than significant to traffic is 110 ADT, the County will likely condition the project to no more than an as yet undetermined number of burials per month to ensure that this threshold is not crossed. Applicant has proposed an average of 4 burials per month but should work with County on the maximum per month for condition.		7/24/2023	
23- 1	Trails	The Old Highway 80 Pathway is a Priority One facility proposed in the County's Community Trails Master Plan (CTMP) and is located parallel to Old Highway 80 along the project's frontage. A trail dedication will be required.		7/24/23	
23- 2	Trails	For trail design guidelines please refer to the CTMP here: <a href="https://www.sandiegocounty.gov/content/dam/sdc/pds/CTMP/DesignandConst.pdf">https://www.sandiegocounty.gov/content/dam/sdc/pds/CTMP/DesignandConst.pdf</a>		7/24/23	
23- 3	Trails	Coordination with PDS trails staff is strongly encouraged.		7/24/23	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

<b>PROJECT NAME: Crescentwood Cemetery</b>			<b>Project Number(s): PDS2023-MUP-23-008</b>		
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
24-1	Photosimulations	Please provide two sets of photosimulations to determine whether a visual analysis will be needed. The Photosimulations should be of the cemetery from multiple vistas at 5 years after opening and 15 years after opening to see how landscaping has matured. After review, the County will determine if further study is needed.		7/24/23	
<b>PROJECT NAME: Crescentwood Cemetery</b>			<b>PROJECT NUMBER: PDS2023-MUP-23-008</b>		
Land Development Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary	Date Identified	Date Resolved

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

PROJECT NAME: Crescentwood Cemetery		Project Number(s): PDS2023-MUP-23-008			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
0 - 1	Watercourses - Jurisdictional Waters of the United States and State: Tijuana - Campo - Clover Flat 911.83	<p>The subject parcel contains watercourses. Please note it is the applicant developers responsibility to coordinate with regional agencies to determine if 401/404, Waste Discharge Requirements, California Fish and Wildlife permits are required. The applicant should coordinate with the agencies early in the CEQA process as obtaining agency permits could take years: The applicant must put the following note on the grading plans.</p> <p>NOTICE: The subject property contains wetlands, a lake, a stream, and/or waters of the U.S. and/or State 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 State or U.S. on the subject property. The agency contact information is provided below.</p> <p>U.S. Army Corps of Engineers: 915 Wilshire Blvd., Suite 1101, Los Angeles, CA 90017; (213) 452-3333; <a href="http://www.usace.army.mil/">http://www.usace.army.mil/</a></p> <p>Regional Water Quality Control Board: 2375 Northside Drive, Suite 100, San Diego, CA 92108; <a href="mailto:RB9_DredgeFill@waterboards.ca.gov">RB9_DredgeFill@waterboards.ca.gov</a> ; <a href="http://www.waterboards.ca.gov/sandiego/">http://www.waterboards.ca.gov/sandiego/</a></p> <p>California Department of Fish and Wildlife: 3883 Ruffin Rd., San Diego, CA 92123; (858) 636-3160; <a href="mailto:AskR5@wildlife.ca.gov">AskR5@wildlife.ca.gov</a> <a href="http://www.dfg.ca.gov/">http://www.dfg.ca.gov/</a></p>		7/18/2023	
1 - 1	General - Fire Protection	Have your project reviewed and commented on by <b>San Diego County Fire Authority</b> . Project's conditions may be revised upon further review and input from the agencies.		7/18/2023	

**ATTACHMENT A**  
**PROJECT ISSUE CHECKLIST**

PROJECT NAME: Crescentwood Cemetery		Project Number(s): PDS2023-MUP-23-008			
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
1 - 2	General - Sanitation	Have your project reviewed and commented on by <b>San Diego County Sanitation District</b> . Project's conditions may be revised upon further review and input from the agencies.		7/18/2023	
1 - 3	General - Water Service	Have your project reviewed and commented on by <b>San Diego County Water Authority</b> . Project's conditions may be revised upon further review and input from the agencies.		7/18/2023	
1 - 4	General - Utility	Have your project reviewed and commented on by <b>San Diego Gas &amp; Electric (SDGE)</b> . Project's conditions may be revised upon further review and input from the agencies.		7/18/2023	
1 - 5	General - Utility	Note if the project proposes encroachments into existing easements under the jurisdiction of San Diego Gas and Electric (SDG&E) it is the applicants responsibility to have the project reviewed and approved by SDG&E prior to the encroachment. Public Utilities Code Sections 851 - 857 requires SDG&E to seek California Public Utilities Commission (CPUC) approval prior to disposing of SDG&E property or allowing encroachments within SDG&E easements. SDG&E's preference is that you consider options that do not encroach within or encumber SDG&E properties, easements or rights-of-way. Allowable uses within SDG&E easements or rights-of-way are very limited in scope and type. Each request to use an SDG&E easement or right-of-way will be reviewed on a case-by-case basis.		7/18/2023	
1 - 6	General - Access	Please provide a complete Title Report/documents with color-coded easement plot for the project site.		7/18/2023	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

**PROJECT NAME: Crescentwood Cemetery** **Project Number(s): PDS2023-MUP-23-008**

Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
2 - 1	Access	Verify proposed and existing driveways meet the minimum required separation distance of 300 feet between driveway centerlines per Section 6.1.C of Public Road Standards dated March 3, 2012. Please confirm the layout meets the standard for existing and proposed driveways along both sides of <b>Old Highway 80 (SC 1883)</b> . Please note any deviation or modification to these design standards requires approval of a Design Exception Request (DER) to the satisfaction of the Department of Public Works (DPW) and PDS. Please note that submittal of a DER does not guarantee approval by DPW and PDS.		7/18/2023	
3 - 1	Plot Plan	<b>Old Highway 80 (SC 1883)</b> is classified as a 2.2E Light Collector with a class II bike lane and intermittent turn lanes (at Campo casino entrances only) from Southern boundary of Central Mountain Subregion boundary to State Route (SR)-94 under the General Plan Mobility Element Network. Table 2A of the Public Road Standards dated March 3, 2012 requires a minimum 40 foot improvement width within 64 feet of dedicated Right-of-Way (ROW). Note ME roads designated with bike lanes shall have an additional 10 feet of pavement and ROW. Please note any deviation or modification to these design standards requires approval of a Design Exception Request (DER) to the satisfaction of the Department of Public Works (DPW) and PDS. Please note that submittal of a DER does not guarantee approval by DPW and PDS.		7/18/2023	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

<b>PROJECT NAME: Crescentwood Cemetery</b>		<b>Project Number(s): PDS2023-MUP-23-008</b>			
<b>Planning &amp; Development Services (PDS) Planning and CEQA Comments</b>					
<b>Item No.</b>	<b>Subject Area</b>	<b>Issue, Revision or Information Required</b>	<b>Issue Resolution Summary (Include Conditions)</b>	<b>Date Identified</b>	<b>Date Resolved</b>
3 - 2	Plot Plan	Note all private internal circulation roads are subject to review and approval by the <b>San Diego County Fire Authority (SDCFA)</b> . This may require the pavement width of the road to be increased to meet Fire Apparatus Road requirements. Per County Private Road Standards and the San Diego County Consolidated Fire Code, the minimum pavement width is 24 feet, with 28 feet graded width within a 40 foot dedicated private easement. Whenever on-street vehicle parking is required, onstreet parking shall be provided by increasing the graded and improved width by six feet (6') for each side of the road in which on-street parking is to be provided. To the satisfaction of the <b>SDCFA</b> and Director of PDS. Please note any deviation or modification to these design standards requires approval of a Design Exception Request (DER) to the satisfaction of the <b>SDCFA</b> and PDS. Please note that submittal of a DER does not gaurantee approval by <b>SDCFA</b> and PDS.		7/18/2023	
3 - 3	Plot Plan	Provide a Vicinity Map please on the cover sheet. Please include Thomas Bros. Page and Grid No.	Sheet 1	7/18/2023	7/18/2023
3 - 4	Plot Plan	Include the Assessor's Book, page and parcel number on the plot plan.	Sheet 1	7/18/2023	7/18/2023
3 - 5	Plot Plan	Show the lines of inundation of the 100-Year Flood Way and 100-Year Flood Plain.		7/18/2023	
3 - 6	Plot Plan	The lowest floor elevation of any structure placed or located within the 100-year flood plain shall be raised 1 foot above the 100-year base flood elevation in accordance with the County Flood Damage Prevention Ordinance.		7/18/2023	
3 - 7	Plot Plan	Provide Land Disturbance quantity and earthwork quantities. This shall include any earthwork for onsite private road improvements and/or any earthwork for any drainage improvements, if applicable. Provide a summary of Work to be Done:	See PGP	7/18/2023	7/18/2023
3 - 8	Plot Plan	Clearly show existing and proposed grading, contours, elevations, BMPs, drainage structures, slopes, retaining walls, etc.	See PGP	7/18/2023	7/18/2023

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

PROJECT NAME: Crescentwood Cemetery			Project Number(s): PDS2023-MUP-23-008		
Planning & Development Services (PDS) Planning and CEQA Comments					
Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
3 - 9	Plot Plan	Call out a proposed DS-07 residential or G-14 commercial driveway at the project frontage connecting to the private road easement. <b>Provide cross section existing and proposed for the access driveway. Show easement width, improvement width, graded width, cross slope etc. for all cross sections.</b>		7/18/2023	
3 - 10	Plot Plan	Show the following dimensions: Exterior property lines, width of roads and easements, size of structures, setbacks from property lines and centerlines to existing and/or proposed structures, distances between detached structures, parking areas and driveways.		7/18/2023	
3 - 11	Plot Plan	Show all existing and proposed structures and their dimensions and floor area, including buildings, sheds, storage areas, etc. Indicate number of stories of buildings. Indicate if structures are existing or proposed. Label buildings and their use. Show fences, wall trash enclosures or dumpster locations. Indicate heights where applicable.		7/18/2023	
3 - 12	Plot Plan	Show walkways, driveways, entrances, exits, parking lot areas with all dimensions. Label handicapped parking. Show contiguous streets with centerlines and all easements. Show parking for service and delivery vehicles and loading and unloading areas.		7/18/2023	
3 - 13	Plot Plan	Indicate any natural drainage (including ephemeral streams) and any proposed drainage systems. Show the slopes of the property and any proposed grading.		7/18/2023	
3 - 14	Plot Plan	Indicate trees with over 6" trunk diameter, streams, rock outcroppings, location of flood zones. Extensive natural features may be shown on a separate drawing.		7/18/2023	
3 - 15	Plot Plan	Show all existing signs to remain and proposed signs. Include elevation drawings with area and height dimensions and construction materials indicated and proposed method of illumination.		7/18/2023	
3 - 16	Plot Plan	Show locations and types of all project lighting		7/18/2023	
3 - 17	Plot Plan	Show all utility lines and easements. (existing and proposed)		7/18/2023	



**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

<b>PROJECT NAME: Crescentwood Cemetery</b>		<b>Project Number(s): PDS2023-MUP-23-008</b>			
<b>Planning &amp; Development Services (PDS) Planning and CEQA Comments</b>					
<b>Item No.</b>	<b>Subject Area</b>	<b>Issue, Revision or Information Required</b>	<b>Issue Resolution Summary (Include Conditions)</b>	<b>Date Identified</b>	<b>Date Resolved</b>
3 - 18	Plot Plan	A preliminary grading plan must be filed with a Site Plan/Major Use Permit conforming to all requirements of Section 87.203 of the San Diego County Code of Regulatory Ordinances, except that it shall not be required to show the estimated grading starting and completion dates. The level of detail required may be less than would be required for actual construction, but shall be sufficient to permit analysis of all on-site and off-site environmental impacts and mitigation measures.	See PGP	7/18/2023	7/18/2023
3 - 19	Plot Plan	Show existing and proposed fencing including heights and materials.		7/18/2023	
3 - 20	Plot Plan	Indicate any phasing of the project.		7/18/2023	
4 - 1	Prelim. Grading Plan	Add the following note: PRELIMINARY GRADING PLAN NOTE: "This plan is provided to allow for full and adequate discretionary review of a proposed development project. The property owner acknowledges that acceptance or approval of this plan does not constitute an approval to perform any grading shown hereon, and agrees to obtain valid grading permissions before commencing such activity."	Provided.	7/18/2023	7/18/2023
4 - 2	PGP	Show a vicinity sketch or other data adequately indicating the site location. The vicinity map shall show distance to nearest street intersection, page and section of Thomas Brothers.		7/18/2023	
4 - 3	PGP	List the name of the applicant/owner, address, and telephone number.	Provided.	7/18/2023	7/18/2023
4 - 4	PGP	List the engineer's name, address, and telephone number.	Provided.	7/18/2023	7/18/2023
4 - 5	PGP	Show project address and Assessor Parcel Number.		7/18/2023	
4 - 6	PGP	Identify the basis for elevations and contours shown		7/18/2023	
4 - 7	PGP	Show approximate property lines of the site on which the work is performed.	Provided.	7/18/2023	7/18/2023
4 - 8	PGP	Show typical cross sections (existing and proposed condition) for all the public and private roads.		7/18/2023	
4 - 9	PGP	Show any buildings or structures on the site where the work is to be performed, and any structures on adjacent land within the fifteen feet (15') of the project.	Provided.	7/18/2023	7/18/2023
4 - 10	PGP	Show any known easements of greater than 20' width.	Provided.	7/18/2023	7/18/2023

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

<b>PROJECT NAME: Crescentwood Cemetery</b>		<b>Project Number(s): PDS2023-MUP-23-008</b>			
<b>Planning &amp; Development Services (PDS) Planning and CEQA Comments</b>					
<b>Item No.</b>	<b>Subject Area</b>	<b>Issue, Revision or Information Required</b>	<b>Issue Resolution Summary (Include Conditions)</b>	<b>Date Identified</b>	<b>Date Resolved</b>
4 - 11	PGP	Show estimates of the amount of excavation, fill, import, and export.	Provided.	7/18/2023	7/18/2023
4 - 12	PGP	Show proposed grading associated with road improvements or other major infrastructure.	Provided.	7/18/2023	7/18/2023
4 - 13	PGP	Show location of any proposed LID features, post-construction BMPs, drainage devices, stormwater protection facilities, walls, cribbing, dams, or other protective devices to be constructed in connection with the proposed work.	Provided.	7/18/2023	7/18/2023
4 - 14	PGP	Show adequate contours to show the topography of the existing ground; and show the proposed grading tied back to natural ground, all at the same scale as the tentative map or site plan whenever possible.	Provided.	7/18/2023	7/18/2023
4 - 15	PGP	Show the direction of lot and street drainage.	Provided.	7/18/2023	7/18/2023
4 - 16	PGP	Show proposed slope ratios, not greater than 1½ : 1 on cuts and 2 : 1 on fills. All slopes must clearly be labeled as either, cut or fill slopes, or shade fill slopes.	Provided.	7/18/2023	7/18/2023
4 - 17	PGP	Show the proposed private road in accordance with County Private Road Standards with a minimum twenty-eight foot (28') graded width with twenty-four foot (24') improved width		7/18/2023	
4 - 18	PGP	Please show all existing drainage facilities on the project site. There appears to be pipes within the vicinity of the project. Please label the approximate sizes.		7/18/2023	
4 - 19	PGP	Provide typical section for Amended Soil Section proposed per PDP SWQMP. Add to legend and clearly identify in plan view the locations of the amended soil sections.		7/18/2023	
4 - 20	PGP	Show Biofiltration basin outlet structure and outlet pipe Label the hydromod orifice diameter on Biofiltration Basin cross-section.		7/18/2023	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

<b>PROJECT NAME: Crescentwood Cemetery</b>		<b>Project Number(s): PDS2023-MUP-23-008</b>			
<b>Planning &amp; Development Services (PDS) Planning and CEQA Comments</b>					
<b>Item No.</b>	<b>Subject Area</b>	<b>Issue, Revision or Information Required</b>	<b>Issue Resolution Summary (Include Conditions)</b>	<b>Date Identified</b>	<b>Date Resolved</b>
4 - 21	PGP	Basin 2 Location: Vegetated structural BMPs that are constructed in the vicinity of, or connected to, an existing jurisdictional water or wetland could inadvertently result in creation of expanded waters or wetlands. As such, vegetated structural BMPs have the potential to come under the jurisdiction of the United States Army Corps of Engineers, SDRWQCB, California Department of Fish and Wildlife, or the United States Fish and Wildlife Service. This could result in the need for specific resource agency permits and costly mitigation to perform maintenance of the structural BMP. Along with proper placement of a structural BMP, routine maintenance is key to preventing this scenario.	Comment for information only.	7/18/2023	
4 - 22	PGP	Show maintenance access to the BMP Basin.		7/18/2023	
5 - 1	Stormwater Quality Management Plan (SWQMP)	The PDP SWQMP review was limited to reviewing the provided PDP SWQMP report and attachments at the current submittal level (preliminary engineering submittal). Site design changes as well as the addition of detail and information on future plan submittals may result in additional comments, beyond the comments listed in this plan review, during future plan reviews.  The SWQMP is a living document to be updated to reflect any changes during the project's final plan review and construction throughout the life of the project in perpetuity.	Submitted	7/18/2023	7/18/2023
5 - 2	SWQMP	PDP SWMQP, Page 1, Project Information: - Revise Record ID to: PDS2023-MUP-23-008		7/18/2023	
5 - 3	SWQMP	PDP SWMQP, Page 1, Project Applicant/Project Proponent: - Please provide phone number and email		7/18/2023	
5 - 4	SWQMP	PDP SWMQP, Page 1, Preparer's Certification: The final SWQMP submitted for approval will require signature by the SWQMP preparer.		7/18/2023	
5 - 5	SWQMP	Attachment 1, Part 1, Project Information: - Revise Record ID to: PDS2023-MUP-23-008		7/18/2023	
5 - 6	SWQMP	Attachment 1, Part 2, Project Applicant/Project Proponent: - Please provide phone number and email		7/18/2023	
5 - 7	SWQMP	Attachment 1, Part 5, Applicant Signature: The final SWQMP submitted for approval will require signature by the applicant/project proponent.		7/18/2023	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

<b>PROJECT NAME: Crescentwood Cemetery</b>		<b>Project Number(s): PDS2023-MUP-23-008</b>			
<b>Planning &amp; Development Services (PDS) Planning and CEQA Comments</b>					
<b>Item No.</b>	<b>Subject Area</b>	<b>Issue, Revision or Information Required</b>	<b>Issue Resolution Summary (Include Conditions)</b>	<b>Date Identified</b>	<b>Date Resolved</b>
5 - 8	SWQMP	Sub-attachment 2.1, DMA Exhibit: - Show existing drainage network, directions, and offsite connections - Update DMA summary table to include decomposed granite and tabulate totals per DMA - Show the locations of Group 2, 3, and 4 Features on the exhibit. - Label the dispersion area sheet flow travel length and slope. Per SD-B, Pervious areas should be flat (with less than 5% slopes). - Please provide biofiltration with partial retention basin detail. - Please provide a typical cross section of the proposed amended soil section, per Fact Sheet SD-B and SD-F. - Show the outlet structure and outlet pipes for the proposed PR-1 BMPs - Show CCSYA west of project boundary - Provide POC for DMA - 4,5, and 7 - Clarify and show what the POC for DMA-6 is. Maintain drainage boundary deliniation consistency with grading plan and drainage study - The amended soil for DMA 7 does not appear to include the entire impervious area, please clarify how this remaining impervious cover is being treated		7/18/2023	
5 - 9	SWQMP	Sub-attachment 2.1, DMA Exhibit: It is unclear how the impervious cover for the burial sites has been calculated. Please provide a breakdown of the average plot site and associated impervious cover. Please add as a note to the DMA Exhibit.		7/18/2023	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

<b>PROJECT NAME: Crescentwood Cemetery</b>		<b>Project Number(s): PDS2023-MUP-23-008</b>			
<b>Planning &amp; Development Services (PDS) Planning and CEQA Comments</b>					
<b>Item No.</b>	<b>Subject Area</b>	<b>Issue, Revision or Information Required</b>	<b>Issue Resolution Summary (Include Conditions)</b>	<b>Date Identified</b>	<b>Date Resolved</b>
5 - 10	SWQMP	Sub-attachment 2.1, DMA Exhibit: Please confirm the basin footprint used in Line 8 of Worksheet B3 is the bottom area associated with the full depth of the mulch, media, filter course and aggregate layers. Provide a detail of the BMP on DMA Exhibit. The cross-section from the PGP can be used with the following corrections: - Label the hydromod orifice diameter.		7/18/2023	
5 - 11	SWQMP	Sub-attachment 2.2: BMP Map book will be required during Final Engineering.	Informational	7/18/2023	7/18/2023
5 - 12	SWQMP	Attachment 5: Include the summary page of the Drainage Report in this attachment.		7/18/2023	
5 - 13	SWQMP	Sub-attachment 6.1 - Self-Mitigating Areas: - provide permit # and PGP Sheet #		7/18/2023	
5 - 14	SWQMP	Sub-attachment 6.3- Self-Retaining DMAs: - provide permit # and PGP Sheet # - The total areas listed on this table do not match the table on DMA exhibit, please maintain consistency		7/18/2023	
5 - 15	SWQMP	Sub-attachment 7.1, Engineer of Work Certification: - Revise Permit Application Number to: PDS2023-MUP-23-008 - The final PDP SWQMP submitted for approval will have to be signed and stamped on this sheet.		7/18/2023	
5 - 16	SWQMP	Sub-attachment 7.2.1, Narrative Strategy: -Please explain what the impervious cover assumptions were for the grave sites. - Please elaborate on Step 2B of Section 5.1. Please provide Table B.2-1 from Section B.2.2 Step 2B – Infiltration Restrictions.		7/18/2023	
5 - 17	SWQMP	Sub-attachment 7.2.2, Structural BMP Summary Table: - Provide Permit Application Number PDS2023-MUP-23-008 and PGP Sheet #		7/18/2023	
5 - 18	SWQMP	Sub-attachment 7.3, Structural BMP Checklist: - Provide Permit Application Number PDS2023-MUP-23-008 and PGP Sheet # - Provide name and contact information (phone number, email) for BMP Verification		7/18/2023	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

<b>PROJECT NAME: Crescentwood Cemetery</b>		<b>Project Number(s): PDS2023-MUP-23-008</b>			
<b>Planning &amp; Development Services (PDS) Planning and CEQA Comments</b>					
<b>Item No.</b>	<b>Subject Area</b>	<b>Issue, Revision or Information Required</b>	<b>Issue Resolution Summary (Include Conditions)</b>	<b>Date Identified</b>	<b>Date Resolved</b>
5 - 19	SWQMP	Sub-attachment 7.4, Worksheet B.1: - The impervious surface number listed for DMA - 2 does not match DMA exhibit - Please clarify what the semi-pervious surfaces listed on line 4 are and show on DMA exhibit		7/18/2023	
5 - 20	SWQMP	Sub-attachment 7.5 can be omitted.	Informational	7/18/2023	7/18/2023
5 - 21	SWQMP	Sub-attachment 8.2: -Please provide a POC description that correlates with the DMA Exhibit.		7/18/2023	
5 - 22	SWQMP	Attachment 10 and 11 will be required and thoroughly reviewed in Final Engineering.	Informational	7/18/2023	7/18/2023
6 - 1	CEQA Hydrology Study	Provide CEQA Level Hydrology Study. The SWQMP Report Attachment 6 refers to CEQA Hydrology Study for the project. Please provide	Submitted	7/18/2023	7/18/2023

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
6 - 2		CEQA Hydrology Study	<p>CEQA Level PGP, Hydrology Study and PDP SWQMP review:</p> <p>The technical study reviews are being conducted for CEQA purposes not for Final Engineering or Construction. Please note that additional analysis, calculations including hydraulic modeling, routing analysis, design and or continuous simulation modeling may be required at Final Engineering at the discretion of the PDS LD plan check reviewer and DPW Flood Control. Please note that any proprietary modeling software and or proprietary BMPs accepted for CEQA Level review may not be accepted at the Final Engineering Construction Level. Please coordinate with your Final Engineering plan check reviewer before submitting technical studies.</p> <p>CEQA Level review is provided in accordance with the County of San Diego - Guidelines for Determining Significance - Hydrology and Water Quality, 2021:  <a href="https://www.sandiegocounty.gov/pds/ceqa/SignificanceGuidelineHydrology2021.html">https://www.sandiegocounty.gov/pds/ceqa/SignificanceGuidelineHydrology2021.html</a></p> <p><b>NOTE: Project issues have been identified to the extent possible based on the information provided. Additional issues may be identified upon subsequent project submittals and input from other agencies, changes to the proposal and/or during final engineering review.</b></p>		7/18/2023	
6 - 3		CEQA Hydrology Study	<p>Submit Preliminary CEQA Level Hydrology Study.</p> <p>San Diego County Hydrology Manual:  <a href="http://www.sandiegocounty.gov/content/sdc/dpw/flood/hydrologymanual.html">http://www.sandiegocounty.gov/content/sdc/dpw/flood/hydrologymanual.html</a></p> <p>San Diego County Hydraulic Design Manual:  <a href="http://www.sandiegocounty.gov/content/dam/sdc/dpw/FLOOD_CONTROL/floodcontrolpdf/hydraulic_design_manual_2014.pdf">http://www.sandiegocounty.gov/content/dam/sdc/dpw/FLOOD_CONTROL/floodcontrolpdf/hydraulic_design_manual_2014.pdf</a></p>	Submitted	7/18/2023	7/18/2023

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

Item No.		Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
<b>PROJECT NAME: Crescentwood Cemetery</b> <span style="float: right;"><b>Project Number(s): PDS2023-MUP-23-008</b></span> <b>Planning &amp; Development Services (PDS) Planning and CEQA Comments</b>						
6 - 4		CEQA Hydrology Study	For Preliminary Hydrology study format, please visit a San Diego County Hydrology Manual, Section 1.6, page 1-21 <a href="http://www.sandiegocounty.gov/content/sdc/dpw/flood/hydrology/manual.html">http://www.sandiegocounty.gov/content/sdc/dpw/flood/hydrology/manual.html</a> In addition to the guideline, the study shall include the following but not limited to:	Informational	7/18/2023	7/18/2023
6 - 5		CEQA Drainage Study	Provide DECLARATION OF RESPONSIBLE CHARGE – See San Diego County Hydrology Manual, Figure 1-9.		7/18/2023	
6 - 6		CEQA Drainage Study	The final CEQA Drainage report shall be signed, stamped and dated by the responsible Registered Civil Engineer.		7/18/2023	
6 - 7		CEQA Drainage Study	In the narrative of the report please provide a summary table of: <b>pre- and post-</b> development C, Tc, I, V <sub>100</sub> , and Q <sub>100 with mitigation</sub> for each area (or point) where drainage discharges from the project. Provide peak runoff rates (cfs), velocities (fps) and identification of all erosive velocities (at all points of discharge) calculations for pre-development and post-development. The comparisons should be made about the same discharge points for each drainage basin affecting the site and adjacent properties.		7/18/2023	
6 - 8		CEQA Drainage Study	Please provide written responses to the following 6 questions:		7/18/2023	
6 - 9		CEQA Drainage Study	1) Summary/Conclusion: Please discuss whether or not the proposed project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? Provide reasons and mitigations proposed.		7/18/2023	
6 - 10		CEQA Drainage Study	2) Discuss whether or not the proposed project would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? Provide reasons and mitigations proposed.		7/18/2023	



**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

<b>PROJECT NAME: Crescentwood Cemetery</b>		<b>Project Number(s): PDS2023-MUP-23-008</b>			
<b>Planning &amp; Development Services (PDS) Planning and CEQA Comments</b>					
<b>Item No.</b>	<b>Subject Area</b>	<b>Issue, Revision or Information Required</b>	<b>Issue Resolution Summary (Include Conditions)</b>	<b>Date Identified</b>	<b>Date Resolved</b>
6 - 11	CEQA Drainage Study	3) Discuss whether or not the proposed project would create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems? Provide reasons and mitigations proposed.		7/18/2023	
6 - 12	CEQA Drainage Study	4) Discuss whether or not the proposed project would place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps? Provide reasons and mitigations proposed.		7/18/2023	
6 - 13	CEQA Drainage Study	5) Discuss whether or not the proposed project would place structures within a 100-year flood hazard area which would impede or redirect flood flows?		7/18/2023	
6 - 14	CEQA Drainage Study	6) Discuss whether or not the proposed project would expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam?		7/18/2023	
6 - 15	CEQA Drainage Study	As currently shown, Tables 4-1, 4-2 and 4-3 are summing the total Q100 for the project, which is incorrect. The comparison should be made at a discharge location, for example, Node 100. The project appears to be increasing peak flows at Nodes 200, 206, 212, and 400. Please provide mitigation for these increases in flow, or provided Drainage Waiver and Release letters from all affected property owners. .		7/18/2023	
6 - 16	CEQA Drainage Study	Proposed Condition Runoff Coefficient Calculations: -Please double check all proposed impervious cover assumptions. The impervious cover assumptions for Nodes 222 to 220, Nodes 220 to 218, and Nodes 202 to 200 appear low based on the drainage Map. Node 218 to 200 should be 100% impervious and has been calculated as 52% impervious.		7/18/2023	
6 - 17	CEQA Drainage Study	Rational Method Calculations: - For Node 218 to 200, please use a street flow calculation instead of a trapezoidal channel flow calculation.		7/18/2023	
6 - 18	CEQA Drainage Study	Existing Conditions Hydrology Maps: - Show entire project boundary		7/18/2023	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

<b>PROJECT NAME: Crescentwood Cemetery</b>		<b>Project Number(s): PDS2023-MUP-23-008</b>			
<b>Planning &amp; Development Services (PDS) Planning and CEQA Comments</b>					
<b>Item No.</b>	<b>Subject Area</b>	<b>Issue, Revision or Information Required</b>	<b>Issue Resolution Summary (Include Conditions)</b>	<b>Date Identified</b>	<b>Date Resolved</b>
6 - 19	CEQA Drainage Study	Proposed Conditions Hydrology Maps: - Show entire project boundary - Show outlet structure, outlet pipe, and emergency spillway location for all proposed conjunctive use basins - Please provide a typical section for the proposed onsite street - Please clarify how runoff will be routed to the conjunctive use basins from the proposed street. Are cross gutters proposed? If so, please provide capacity calculations and confirm the 100-year storm flow rate can be conveyed to the basins		7/18/2023	
6 - 20	CEQA Drainage Study	Attachment D: Please remove the "exfiltration outflows" from the rating curve calculations. Per the Hydraulics design manual and concurrent with the conjunctive use criteria, stage-discharge data must only include outflow through the lowest above-ground outlet and any other outlets above the lowest above-ground outlet. Infiltration and outflow through the underdrain must be excluded from the flood control analysis.		7/18/2023	
6 - 21	CEQA Drainage Study	Please provide emergency spillway calculations in accordance with Section 6.2.4.3 of the Hydraulic Design Manual. The Engineer must demonstrate in Final Engineering that the basin has an emergency spillway/outlet capable of conveying the undetained 100-year design event and provide an analysis that the downstream conveyance system (storm drain, public roads, etc.); downstream of the emergency spillway/outlet, can safely convey flows without impacting public or private property pursuant to the HDM.		7/18/2023	
6 - 22	CEQA Drainage Study	Hydraulic analyses for existing and proposed pipes, brow ditches, etc. will be required during final engineering.		7/18/2023	

**ATTACHMENT A  
PROJECT ISSUE CHECKLIST**

**PROJECT NAME: Crescentwood Cemetery** **Project Number(s): PDS2023-MUP-23-008**

Planning & Development Services (PDS) Planning and CEQA Comments

Item No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	Date Resolved
7 - 1	Sight Distance	<p>Provide a sight distance study to demonstrate that: Adequate intersectional sight distance in both directions along <b>Old Highway 80 (SC 1883)</b> from the proposed driveway is achievable per Section 6.1.E, Table 5 of the County Public Road Standards (approved March 2012). If the lines of sight fall within the existing public road right-of-way, the engineer or surveyor shall further certify that: "said lines of sight fall within the existing right-of-way and a clear space easement is not required."</p> <p>Additional information can be obtained in the following link: <a href="http://www.sandiegocounty.gov/content/dam/sdc/dpw/COUNTY_ROADS/roadspdf/pbrdstds.pdf">http://www.sandiegocounty.gov/content/dam/sdc/dpw/COUNTY_ROADS/roadspdf/pbrdstds.pdf</a></p>		7/18/2023	
8 - 1	Traffic Impact Analysis	<p>On September 28, 2022 the Board of Supervisors adopted a new Transportation Study Guide (TSG) that establishes CEQA threshold thresholds utilizing Vehicle Miles Traveled (VMT) in compliance with Senate Bill 743 and provides direction to applicants for transportation analysis. As part of the TSG, the threshold for determining transportation impacts is based on the SANDAG regional average and there are location-based screening criteria based on infill within transit opportunity areas and villages.</p> <p>The location based maps can be found here: <a href="https://gis-portal.sandiegocounty.gov/arcgis/apps/webappviewer/index.html?id=c8baf13775b844cd8e3e1fd820d9a881">https://gis-portal.sandiegocounty.gov/arcgis/apps/webappviewer/index.html?id=c8baf13775b844cd8e3e1fd820d9a881</a></p>		7/18/2023	

Should you have any questions regarding these comments, please contact [Sean.McLean@sdcounty.ca.gov](mailto:Sean.McLean@sdcounty.ca.gov).

	EDWIN M. SINSAY, LD MANAGER				
	PDS-LAND DEVELOPMENT				
	EMS: SM				
cc:	PDS2023-MUP-23-008 file				

**ATTACHMENT B**  
***ESTIMATE OF DISCRETIONARY PROCESSING TIME AND COSTS***

The attached estimate of discretionary processing time and costs is an estimate of the deposits required to process the application through hearing/decision. Several assumptions were required to supply the cost estimate and schedule at this time in the process. If the assumptions listed on the bottom of the attached estimate prove to be incorrect, your cost estimate will be adjusted. Deposits will be requested in installments as funds are needed to continue processing. Be aware that Section 362 of Article XX of the San Diego County Administrative Code, Schedule B, 5 and 6 states:

*The Director of Planning & Development Services may discontinue permit processing and/or recommend denial of the said project based on non-payment of the estimated deposit and all actual processing costs that may not have been included in the estimate.*

Payment of Fish and Wildlife Fees

The initial review of your project indicates that there will be an effect on native biological resources. Therefore, State law requires the payment of a fee to the California Department of Fish and Wildlife for their review of the project environmental document (Fish and Wildlife Code §711.4). If this fee is needed, it will be requested and collected at a later time during the process. Payment of the fee is required regardless of whether or not we consider the effect on native biological resources to be significant or clearly mitigated. The Project Manager will remind you to pay this fee immediately prior to public review of the project environmental document.

## ESTIMATE OF DISCRETIONARY PROCESSING TIME AND COSTS

Project Name: Crescentwood Cemetery  
 Project Number: PDS2023-MUP-23-008  
 Staff Completing Schedule: Jae Roland-Chase  
 Decision-Making Body: Planning Commission  
 Date Schedule Produced/Revised: 7/27/2023

TASK/ACTIVITY	Estimated Duration (Days)	Estimated Completion Date	Actual Completion Date
<b>Major Pre-Application Conference</b>		N/A	N/A
<b>Application Submittal</b>	<b>185</b>	<b>4/3/2023</b>	<b>4/3/2023</b>
PDS reviews project application "completeness" , completes planning and environmental scoping	30	5/3/2023	7/25/2023
PDS meets with applicant to discuss scoping letter, cost estimate and schedule	10	8/4/2023	
<b>Applicant Submits 1st Iteration submittal per scoping letter requirements*</b>	<b>90</b>	<b>11/2/2023</b>	
PDS Reviews 1st Iteration Submittal	30	12/4/2023	
PDS meets with applicant to discuss 1st iteration submittal*	10	12/14/2023	
<b>Applicant Submits 2nd Iteration submittal addressing PDS comments*</b>	<b>45</b>	<b>1/29/2024</b>	
PDS Reviews 2nd Iteration Submittal	21	2/19/2024	
PDS meets with applicant to resolve final project issues*	30	3/20/2024	
PDS finalizes Environmental Initial Study and prepares Application Amendment Form (if applicable)	21	4/10/2024	
<b>Applicant submits requested information (Application Amendment form, copies of plans, technical studies, etc.)</b>	<b>14</b>	<b>4/24/2024</b>	
PDS completes, advertises and distributes draft Negative Declaration	14	5/8/2024	
Public review of draft Negative Declaration	30	6/7/2024	
PDS Responds to Public Comments (completion date depends on number & complexity of comments, need for technical study revisions, etc.)*	13	6/20/2024	
PDS Finalizes environmental documentation	7	6/27/2024	
<b>Applicant submits requested information/deposits</b>	<b>10</b>	<b>7/8/2024</b>	
PDS makes staff recommendation on the project & finalizes project documentation	30	8/7/2024	
Planning Commission Hearing	37	9/13/2024	

### PROJECT SCHEDULE ASSUMPTIONS

Project description remains consistent throughout process  
 Applicant will submit information in accordance with schedule  
 All issues will be resolved concurrently.  
 Bolded tasks are under the control of applicant/consultant.  
 \* Task can be eliminated if earlier draft documents are adequate.  
 Hearing date subject to decision making body availability & schedule  
 The project will not be continued by decision maker or appealed  
 Dates which fall on a holiday have an actual completion date the first business day after such holiday  
 Assumes deposit account balance remains positive. County work may not proceed without adequate funds.  
 Assumes public review comments are not exceptionally numerous or complex

### COST ESTIMATE ASSUMPTIONS

Estimate is based on relative cost of projects of similar complexity  
 Estimate does not include applicant's consultant/engineering costs  
 Does not include County costs for post discretionary review (e.g. final map)  
 Costs assume project schedule assumptions are maintained  
 Costs will be paid at installments throughout the process  
 If project is over budget, cost estimate will be revised  
 The State of CA adjusts Fish and Wildlife Fees annually for inflation  
 Project will rely on a Negative Declaration  
 Cost estimate does not include additional deposits for Trails Review or DEH that may be required

### COST ESTIMATE SUMMARY

Total Discretionary Cost Estimate	\$166,260
Deposits Paid to Date	\$20,489
Account Balance	\$129
Estimated County Costs Remaining	\$145,771
Fish & Wildlife Fees/ County Clerk Fee	\$2,266
% Expended of Total Cost Estimate	12.25%

**ATTACHMENT C**  
***MEMORANDUM(S) OF UNDERSTANDING***

**CONSULTANT LIST & MEMORANDUM OF UNDERSTANDING (MOU)**

The County of San Diego's CEQA guidelines require that environmental technical studies be prepared by a consultant from the County's CEQA Consultant List, which can be found on the County of San Diego Planning & Development Services website at: <http://www.sdcounty.ca.gov/PDS/docs/CONSULTANT.xls> and that technical studies be prepared using the Guidelines for Determining Significance and Report Format & Content Requirements for applicable subject areas. The Guidelines and Report Format & Content Requirements can be found on the Department's website at <http://www.co.san-diego.ca.us/PDS/procguid.html#guide> (listed in alphabetical order).

Technical studies for the following subject areas are required to continue processing your project. For these subjects, a Memorandum(s) of Understanding (MOU) must be completed and signed by the applicable consultant and the applicant. The MOU outlines the roles and responsibilities for all parties in the preparation of technical studies and is intended to contribute to improved environmental document quality.

The MOU can be found on the Department's website at:

<http://www.sdcounty.ca.gov/luegdocs/Templates/Boilerplate%20Templates/MOU.doc>.

Signed MOU's must be submitted for the following subject areas:

- Air Quality
- Archaeological Resources
- Biological Resources
- Groundwater
- Fire Protection Planning
- Noise

Applicants are responsible for selecting and direct contracting with specific consultants from the County's approved consultant list to prepare the required technical studies. The responsibilities of all parties involved in the preparation of environmental documents for the County (i.e. applicant, individual CEQA consultants/sub-consultants, consulting/sub-consultant firms, and County) are clearly established in the MOU.

## ATTACHMENT D NOISE

The Cemetery project proposes a burial site, paved internal circulation driveways, pathways, parking lot, storage, small viewing gazebo, and perimeter fencing. All pre-burial ceremonial actions, prayers, and preparation of the body to lay rest is planned to take place off-site. Preliminary review of the project information indicates that there is insufficient information to determine whether operations on-site will exceed sound level limits of the San Diego County Noise Ordinance (Section 36.404). The County Noise Ordinance does not permit noise levels that impact adjoining properties or exceed County Noise Standards. The project site as well as adjacent land uses are zoned General Rural (S92) that allows a one-hour average sound level of 50 decibels (dBA) from 7 a.m. to 10 p.m. and 45 decibels dBA from 10 p.m. to 7 a.m. In order for the Department to make a determination on the project's conformance with County noise standards, the applicant must demonstrate that the hourly average sound levels do not exceed either threshold at the property line, as the most stringent Ordinance condition for the project.

In addition, a preliminary review of the project information provide indicates that there is insufficient information to determine whether temporary construction equipment operations on-site will exceed sound level limits of the San Diego County Noise Ordinance (Section 36.409):

- Except for emergency work, it shall be unlawful for any person to operate construction equipment or cause construction equipment to be operated, that exceeds an average sound level of 75 decibels for an eight-hour period, between 7 a.m. and 7 p.m., when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received. Amended by Ord. No. 9962 (N.S.), effective 1-9-09.

To determine conformance to the County Noise Ordinance, a noise study is required and it is essential that this component of this analysis include the following information:

### Permanent Noise Sources:

- (1). Manufacturers Spec Sheet and/or field measurements for all noise producing equipment on-site that identifies the ARI standard and/or decibel (dBA) per range. It is important to note that all noise producing sources must be included.
- (2). Field measurements and/or noise source data for all noise producing operations and activities on-site that identifies a decibel (dBA) per range. It is important to note that all noise producing sources must be included.
- (3). Additional plot plans that identifies the site location of all noise sources in relation to property lines. Discuss the worst-case noise source to property line distances (in feet). It is essential to address all potential noise sources on-site and to include a discussion related to openings within all surrounding walls or fences, such as driveways, fencing and gates.
- (4). Hours of operation and activity level at each hour.

- (5). Demonstrate that the proposed **cemetery operations including heavy machinery used for burials** will comply with the property line sound level limits per County noise standards.
- (6). Include any recommended design features and mitigation measures if required to demonstrate compliance with the County Noise Ordinance, Section 36.404.

Temporary Construction Equipment Operations:

- (7). Manufacturers Spec Sheet and/or field measurements for all construction equipment that identifies a decibel (dBA) per range. It is important to note that all noise producing sources must be included.
- (8). Additional plot plans that identifies the site location of all construction equipment noise sources in relation to property lines. It is essential to address all potential construction equipment noise sources on-site.
- (9). Identify all existing occupied property/structures adjacent to the boundary of the project site.
- (10). Include the schedule of the grading activities, phasing and preparation of the project site.
- (11). Address the associated cut and fill of materials, and specify whether the operations of general construction equipment and/or impulsive construction equipment are proposed. (e.g. drill rigs, rock crushers, hoe rams, pile drivers, blasting equipment, etc.)
- (12). Include any recommended design features and/or temporary construction/demolition mitigation measures if required to demonstrate compliance with County Noise Ordinance, Section 36.409.

A formal noise study is not required at this time. **The noise memorandum shall be focused to demonstrate compliance with the County of San Diego Noise Ordinance, Sections 36.404, 36.409, and 36.410.** The noise letter shall follow the County's Guidelines for Determining Significance for Noise available online at <http://www.sdcounty.ca.gov/PDS/docs/Noise-Guidelines.pdf>.



## **ATTACHMENT E GROUNDWATER RESOURCES**

The proposed project is located within a groundwater dependent area of the unincorporated County with no other source of water available.

**Proposed On-site Groundwater Use:** In June 2023, the applicant's groundwater consultant indicated a preliminary draft water demand for project construction is approximately 5 acre-feet. This amount will be required to be refined with backup justification during the groundwater investigation. The consultant also indicated the project does not anticipate water usage for irrigation purposes but rather a non-irrigated hydroseed mixture for erosion control will be used. As part of the groundwater investigation, include any other water uses such as water for dust suppression on roadways during grading and/or funerals.

General Project Information: The project is proposing to use groundwater. Based on the potential impacts the project may have on groundwater resources, a groundwater investigation is required to evaluate the significance of potential impacts. The groundwater investigation report must be completed using the County's approved Guidelines for Determining Significance and Report Format and Content Requirements which can be found on the World Wide Web at <https://www.sandiegocounty.gov/content/dam/sdc/dplu/docs/GRWTR-Guidelines.pdf> (Guidelines)  
<https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/GRWTR-Report-Format.pdf> (Report Formats).

The project is also subject to the Groundwater Ordinance. The investigation must meet the requirements of the SAN DIEGO COUNTY GROUNDWATER ORDINANCE NO. 10249 (NEW SERIES). This document is available at <http://www.sdcounty.ca.gov/dplu/docs/GROUNDWATER-ORD.pdf>

The proposed project cannot be recommended for approval unless the groundwater investigation can demonstrate to the satisfaction of PDS that the required findings within Section 67.722.B of the Groundwater Ordinance can be made.

**Groundwater Investigation Requirements:** Below is a list of items which must be analyzed in the investigation as described in detail in the Guidelines for Determining Significance and Report Format Guidelines and Content Requirements for Groundwater Resources.

50% Reduction of Groundwater in Storage: A 30-year water balance shall be performed to evaluate potential impacts to groundwater resources. Estimates of groundwater storage capacity must be estimated for each hydrogeologic unit at the project site and within the project's watershed. Evaluate the long-term groundwater availability for the project's watershed which takes into consideration groundwater recharge, estimated groundwater in storage, and groundwater demand under each of the following scenarios:

- (1) Existing groundwater demand.
- (2) Existing groundwater demand plus the project water demand.
- (3) Existing groundwater demand plus the project water demand and the water demand of all other reasonably foreseeable projects.

The evaluation shall indicate whether groundwater in storage will be reduced to a level of 50% or less as a result of potential groundwater extraction over at least a 30-year period from July 1993 through June 2023.

Well Testing: The onsite well that will be utilized for this project shall be well tested as part of the groundwater investigation. The well will be tested to evaluate its long-term capacity and to evaluate potential well interference on other well users and/or groundwater dependent habitat (if any is present within the vicinity of the proposed well test locations). The results from the well test will be used to determine whether adequate water exists within the well analyzed and whether project pumping will result in potentially significant well interference impacts to the nearest offsite well and groundwater dependent habitat (if applicable).

Well Test Plan: Prior to performing any well test, a well test plan must be prepared and submitted to the County Groundwater Geologist for approval. The well test plan must be prepared by an approved County CEQA Consultant for Groundwater Resources. Additionally, all field work associated must be under the direct supervision of the approved County CEQA Consultant. Submittal and approval of this plan will ensure that the well test is conducted in compliance with the necessary requirements for the project. For items to include in the plan, please refer to Section 1.0, Well Test Plan in Attachment A of the Report Format Guidelines and Content Requirements for Groundwater Resources.

Groundwater Investigation Report: The report shall follow the items outlined in the County Report Formats. Section 3 and 4 of the report shall include impacts analysis for 50% Reduction in Storage, long-term well yield, and potential offsite well interference.

Section 5 shall provide a summary of project groundwater impacts and mitigation. A Groundwater Mitigation and Monitoring Program (GMMP) may be required based on the findings of the groundwater investigation. If well testing conducted indicates that significant impacts to groundwater dependent habitat or offsite well users are possible due to onsite pumping, thresholds for water level declines in monitoring well(s) may be recommended to ensure groundwater declines remain below levels of significance. Should the water level thresholds be met, the GMMP must include mitigation measures that include a reduction or cessation in on-site pumping until water levels in the monitoring wells rise above the thresholds. Additionally, the GMMP shall include the maximum amount of groundwater to be used during construction and ongoing activities. Elements within the GMMP will be made conditions of the MUP.

Please e-mail Jim Bennett, Water Resources Manager at [jim.bennett@sdcounty.a.gov](mailto:jim.bennett@sdcounty.a.gov) or call at 619-346-1476 if you have any questions regarding these comments.

## **ATTACHMENT F CULTURAL RESOURCES & DRAFT CONDITIONS**

### **STAFF CULTURAL RESOURCES REVIEW**

Project Specific Information: A cultural study titled, “Archaeological Technical Report – Crescent Cemetery Project, PDS2023-MUP-23-008” (February 2023) prepared by Michael De Giovine et.al. was submitted and has been reviewed. Revisions to the study are required. Please address comments and revisions provided in the Word document. Provide an executed MOU with the next submission.

Native American Consultation: County staff will conduct outreach with the Native American communities for the purpose of AB-52 consultation, if required. The intent of Native American consultation is to allow tribes an opportunity to participate in local land use decisions at an early planning stage for the purpose of protecting or mitigating impacts to Native American cultural resources.

**The Memorandum of Understanding must be executed by the applicant and consultant and subsequently submitted with the next iteration review.**

#### **Draft Conditions:**

***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).

#### **Cultural Resources**

##### **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.

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

## **CULT#2 - 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 San Diego curation facility or a culturally affiliated 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 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 or reburied onsite. 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.

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**Draft Grading Plan Notes:**

**Archaeological Monitoring**

***PRE-CONSTRUCTION GRADING AND/OR IMPROVEMENTS:*** (Prior to any clearing, grubbing, trenching, grading, or any land disturbances.)

**(CULTURAL RESOURCES)**

**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 actions shall occur throughout the duration of the grading construction).*

## **(CULTURAL RESOURCES)**

### **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.

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.

**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.

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

**(CULTURAL RESOURCES)**

**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.

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

**(CULTURAL RESOURCES)**

**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 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. Prehistoric materials may be reburied onsite. 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.

**ATTACHMENT G**  
**DEPARTMENT OF ENVIRONMENTAL HEALTH & QUALITY**

**PDS2023-MUP-23-008, Crescentwood Cemetery, Old Highway 80, La Posta**  
**APN: 608-080-33**

**SCOPING DISCUSSION:**

DEHQ has reviewed the proposed Major Use Permit, submitted to PDS 4/3/23, for the proposed cemetery. The project proposes the use of no potable water and portable restrooms. There is an onsite well that was permitted under DEH2022-LWELL-003325. The well was constructed with a 110' annual seal, per well completion report provided by Paul Stehly (C57-#709686).

The project proposes 4 burials per month. This proposed use would exempt to project from the need to establish a permitted water system for potable water service. Any potable water supply that does not serve 25 persons per day, at least 60 days per year is exempt from having to establish a permitted water system.

**RECOMMENDATION:**

The Department of Environmental Health & Quality, Land & Water Quality Division, cannot recommend approval of the proposed project. The following items need to be resolved before DEHQ can recommend approval of the project:

- The proposal to utilize portable restrooms on the site cannot be supported by DEHQ. Permanent facilities with frequent use must have a means of onsite wastewater disposal when sanitary sewer is not available. The applicant would need to submit a design for an onsite wastewater treatment system as part of the proposed project revisions. Based on the proposed use, a minimal onsite wastewater treatment system would be expected for restroom facilities. This system should be a 1000-gallon septic tank with 200' of standard leach line and 100% reserve area. Percolation testing is not required, as the soil conditions in the area are well known.
- The proposed burial areas would need to maintain at least a 100' separation from the existing water well. The California Well Standards do not list specific setbacks for burial sites, but does make the statement that, *"Many variables are involved in determining the "safe" separation distance between a well and a potential source of pollution or contamination. No set separation distance is adequate and reasonable for all conditions. Determination of the safe separation distance for individual wells requires detailed evaluation of existing and future site conditions."* DEHQ staff are willing to discuss this specific aspect of the project with the applicant to determine an appropriate setback to prevent future groundwater contaminants.
- The applicant would need to have the existing well sampled by an independent third-party water sampler, approved by DEHQ, to verify that the existing well meets potability standards. A list of such providers is available from DEHQ.

If you have any questions regarding the above, please call me at (619)208-0337.

Sincerely,  
Scott Rosecrans  
EHS III, REHS

## ATTACHMENT H HYDROLOGY & WATER QUALITY

A Technical Memorandum shall be prepared by a California Professional Geologist to evaluate the risk of necroleachate impacting groundwater resources. The risk screening will make an initial determination as to the following California Environmental Quality Act (CEQA) question: X. HYDROLOGY AND WATER QUALITY: a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

The Technical Memorandum shall include the following:

- Bacteria/Viruses, Nitrate and Ammonium Loading Study: a water loading study that looks at the cumulative load at buildout of the cemetery, using a mass balance method, to determine whether the load from the project has the potential to cause the concentration of in-ground water to exceed applicable groundwater quality objectives/primary drinking water standards.
- Risk Screening Evaluation: using soil type, lithology type, rock type (secondary porosity of fractures), depth to groundwater, flow mechanism, and distance to sensitive receptors (production wells, surface water bodies), evaluate the relative risk of necroleachate impacting groundwater resources. The risk of being sited atop of a fractured rock aquifer should be taken into consideration given the potential for fractures to transport contaminants. Rock outcrops documented on the grading plan indicate the fractured rock may be at land surface within portions of the project footprint.
- Cemetery Setback Distances: an evaluation and recommendation of an appropriate setback distance to nearest sensitive receptors shall be included, taking into consideration (1) the loading study/risk screening evaluation and (2) setback guidance from California (including local municipalities), other states, and pertinent international locales. One source to use to aid in the evaluation of setbacks: Hydrogeological Cemetery Setback Criteria Assessment for Stafford County, Virginia, prepared by ECS Mid-Atlantic, LLC dated July 2020. If the recommended setback encroaches into the cemetery footprint, mitigation may include redesign of the cemetery footprint to ensure setback requirements are met to the nearest identified sensitive receptor(s).
- Vertical Separation from Groundwater: an evaluation of the bottom of anticipated gravesites to highest historic groundwater elevation shall be performed to ensure there is adequate vertical separation. It is recommended to use a 5-foot minimum separation requirement.

The Technical Memorandum shall provide a recommendation regarding potential additional work needed to address the CEQA determination and appropriate monitoring and mitigation, if necessary.

Please contact Scott Rosecrans (phone: 619-208-0337 email: [scott.rosecrans@sdcounty.ca.gov](mailto:scott.rosecrans@sdcounty.ca.gov)) or Jim Bennett (phone: 619-346-1476 email: [jim.bennett@sdcounty.ca.gov](mailto:jim.bennett@sdcounty.ca.gov)) or if you have any questions regarding these comments.

**ATTACHMENT I  
AIR QUALITY REPORT WITH COMMENTS**

**ATTACHMENT J  
BIOLOGICAL RESOURCES REPORT WITH COMMENTS**

**ATTACHMENT K  
CAMPO/LAKE MORENA CPG LETTER WITH COMMENTS**

**From: Billie Jo Jannen, Chairman, Campo Lake Morena Community Planning Group**

**To: San Diego County Board of Supervisors and SDC staff**

June 28, 2023

**Preliminary advice PDS2023-MUP-23-008: Crescentwood Cemetery poses a credible threat to groundwater with 350 bodies a year, dearth of science-based cemetery regulations, and lack of transparency by applicants**

Dear Planners and Supervisors:

The Campo Lake Morena Community Planning Group, at its June 26, 2023 meeting, voted unanimously, with two members absent, to forward preliminary advice as follows:

**1. The project application is incomplete, as SD Crescentwood Cemetery is also planning a second phase that is even more impactful than the burial ground currently under review. Both the state and the county frown on doing large projects in piecemeal, as does this planning group. The community and project neighbors deserve to see full studies on the cumulative impacts of the whole project. The proponents should re-submit the complete project that it envisions.**

**2. Cemeteries in general are risky over groundwater, and nothing we have seen indicates that the local groundwater would be immune to the effects of pollution from 350 decomposing bodies per year. No local studies have been carried out on the effects of cemetery effluent on local groundwater. In addition to testing the speed at which foreign materials move into groundwater and out to neighboring wells, the proponents should be required to provide full testing of groundwater quality under local cemeteries to learn what bacteria, chemicals and heavy metals can be expected to appear.**

**3. The frequency of burials and expected traffic and groundwater impacts need to be characterized correctly. While the proponents have claimed only 4 funerals a month, *their website homepage claims 350 a year*. That becomes a funeral each day. Once the mortuary is built, all ceremonies and prayers will be held onsite, along with digging machinery droning on every day.**

This project is the only cemetery that the county has processed in recent, or even not-so-recent memory. The county has **no regulations specific to siting cemeteries over groundwater, and no experience whatsoever in siting and processing them**. Worse, we have no baseline figures for general impacts to groundwater underneath local cemeteries.

It's noteworthy that we residents can't even bury a large animal without a county permit, **yet county staff are being quite lenient with a project that involves many more tons of potential effluent than a single dead horse**. Because we and staff have no guidance from science or regulations, it behooves us to be extra vigilant and try to anticipate potential issues that may arise specific to groundwater. We owe our best due diligence to the area's residents, both on and off the reservation, to protect them from contamination of their only water source.

By their own fundraising statements, the applicants will have **30 funerals per month - not the 4 they claim** - and once they they get their "Phase 2" permitted, the modest burial ceremonies will morph into all ceremonies and procedures, from washing the body and conducting multiple daily prayers, to full

memorial services. Their claim of 4 simple burials a month and almost no irrigation gets them out of multiple permitting responsibilities and out of having to correctly quantify their traffic, water and light pollution impacts, per CEQA and state groundwater laws.

There is also nothing to prevent the applicants from doing many more burials per month than they claim. Once the cemetery is permitted, they can have 30, 40 or even 50 burials a month with no oversight and no enforcement of their professed 4 per month.

This project has been in the works since August 2021 and as of that first submission, included a full mortuary, caretaker housing, restrooms, and irrigated landscaping.

Because they already met with staff for the original submission, we know that the cemetery board knew they would need to do water and other studies in order to build all that. Subsequently, they have resubmitted their plan in a way that looks to us like the cemetery board is attempting to piecemeal the project and avoid the necessary studies to protect groundwater and other resources. The timeline to date:

Aug. 13, 2021	Application PDS2021-IC-21-066 tendered for Crescentwood Cemetery and Mortuary, with landscaping, shade trees, restrooms, septic field, solar system, burial ground, pathways, outdoor viewing area, parking lot, storage building and caretaker housing on parcel #608-080-33-00
Sept. 3, 2021	Final entry in the processing notes, which included various pre-application and pre-scoping meetings, as well as environmental specialist reviews
Jan. 12, 2022	Articles of incorporation filed with state, SD Crescentwood Services Inc.
Feb. 17, 2022	Patels sign over land to SD Crescentwood Services Inc.
Nov. 16, 2022	<b>Domestic</b> well permit application tendered by SD Crescentwood Services and signed by a CC board member as “property owner.”
Nov. 29, 2022	<b>Domestic well permit</b> issued by county, <b>counter to Executive Order N-7-22</b> , which prohibits processing of non-domestic wells without attestation from a licensed geologist that “the well is (1) “not likely to interfere with the production and functioning of existing nearby wells” <b>and</b> (2) “not likely to cause subsidence that would adversely impact or damage nearby infrastructure.”
Feb. 9, 2023	IRS issues tax-exempt status (effective back to Jan. 12, 2022) to SD Crescentwood Services.
April 3, 2023	New application tendered by SD Crescentwood Inc. for burial ground, pathways, outdoor viewing area, parking lot and storage building on parcel #608-080-33-00
April 14, 2023	The Crescentwood Cemetery progress web page, located at <a href="https://www.sdcws.org/progress.html">https://www.sdcws.org/progress.html</a> , divides the project into 2 phases, the first being the burial ground sought by the current application. The page describes Phase 2 as a full mortuary with bathing area, viewing area, storage area and prayer area for 5 daily prayers.
April 22, 2023	Fundraising video downloaded on this date from the Crescentwood Cemetery Facebook page is a lengthy, vigorous appeal for money that describes in glowing detail the cemetery and mortuary to come. It emphasizes the hundreds of Muslims per year who need burial space. This video was still up as of June 21, 2023.
May 11, 2023	Well completion report submitted. The well was completed Feb. 7, 2023 – less than a month after the well was completed.



May 22, 2023

Proponents presented their project, apologized for their well-drilling “mistake,” and shrugged off the website statements, saying they had decided to scale down the project due to money concerns.

It seems clear that drilling the well before the second project submission was an attempt to get on-site water while circumventing the required studies. The proponents had already met extensively with county staff and knew what should have been required. Despite all this evidence, DEHQ is giving the project a pass, based solely on the applicant’s claim that it will only perform 4 burials a month. Worse, it has given it’s blessing for siting burials a mere 100 feet from its own well, and with no consideration for groundwater movement throughout the neighborhood. **Groundwater movement in the neighborhood needs to be studied.**

Exclusion of the mortuary, restrooms, shade trees and caretaker quarters is equally odd, since the cemetery board has continued to advertise plans for a mortuary and to make vigorous pleas for donations to build it.

When I pointed this out to the project engineer, and asked why they were raising funds for a high-impact structure that isn’t on their current plan, they immediately removed all mention of Phase 2 on their website. **We printed the original progress page and homepage and they are attached to this letter.**

Phase 2 will exponentially magnify all impacts, including groundwater quantity and quality, light pollution and traffic. Trying to piecemeal this project is unacceptable and the would-be neighbors deserve better from us all. **The complete project needs to be fully studied with both phases included in order to determine cumulative impacts.**

Sincerely,



Billie Jo Jannen, Chairman  
Campo Lake Morena CPG

**Recipient list**

- District 1
- District 2
- District 3
- District 4
- District 5
- Jae Roland-Chase
- Jim Bennett
- Scott Rosecrans
- Steve Wragg
- Gregory Kazmer