



South Coast Air Quality Management District

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Evan-Brown Crematory Conditional Use Permit 010-2922

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. AQMD staff received an air quality analysis of this project from the lead agency that was prepared by the project proponent. This report presented an analysis of potential regional and local air quality impacts as well as health risks and climate change impacts from operation of the proposed crematory. All air quality impacts quantified in this analysis were found to be less than significant. It is our understanding that the lead agency has therefore determined that this project is categorically exempt under California Environmental Quality Act (CEQA) Guidelines 15332. The following three comments in this letter are meant as guidance for the Lead Agency to consider prior to approving the proposed Conditional Use Permit (CUP).

First, AQMD staff encourages the Lead Agency to consider the potential health effects of this facility prior to approving new development within one quarter mile of the site. Based on the Health Risk Assessment (HRA) prepared for this project, the carcinogenic health risk is 9.7 in one million for workers, which is close to AQMD's CEQA threshold of 10 in one million. The AQMD staff is concerned that health risks may be significant for housing or other sensitive uses placed in the vacant land near the proposed crematory in the future.

Second, the Lead Agency should be aware that the AQMD received nearly 60 complaints over the past 5 years of odor, smoke, and dust from other crematories within our jurisdiction. In light of this information, prior to approving the CUP for this project, AQMD staff recommends that the Lead Agency put in place community response procedures to address any potential future air quality issues associated with this facility. This could include requiring the facility to: identify a community coordinator who can respond to future complaints; install a sign at the main entrance that contains contact information for both the facility and the AQMD hotline (800 CUT-SMOG); and prepare a protocol for responding to odor complaints from the surrounding community.

Lastly, as indicated in the cover letter to the air quality analysis, the proposed facility will require AQMD permits in order to operate as the facility is subject to Regulation XIII – New Source Review and Rule 1401 (New Source Review for Toxics). AQMD staff reminds the Lead Agency that a more extensive CEQA analysis may be required should impacts from the proposed facility exceed AQMD significance thresholds upon permit review.

AQMD staff is available to work with the Lead Agency to address these issues. If you have any questions regarding this letter please call Ian MacMillan, Program Supervisor, CEQA Section, at (909) 396-3244.

Sincerely,



Ian MacMillan
Program Supervisor
CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

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