



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Draft Mitigated Negative Declaration (Draft MND) for the
Crescent Gardens Cemetery (Proposed Project)
(SCH No: 2025080061)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The Riverside County is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

Summary of Proposed Project Information in the Draft MND

Based on the Draft MND, the Muslim Mortuary and Cemetery Committee, a licensed nonprofit in California, is proposing the Crescent Gardens Cemetery Project on a 46.4-acre portion of an 84.99-acre site in Meadowbrook, Riverside County. The cemetery will include approximately 20,000 burial plots across 24.6 acres, adhering to Muslim burial traditions, with an estimated 10–15 burials per month. Facilities to Be Constructed:

- 5,559 square feet (sf) Ceremonial Cleansing Facility (CCF) – includes a special drainage system for wash water
- 11,079 sf two-story chapel
- 2,090 sf caretaker's residence with a 400 sf garage
- 1,358 sf equipment shed
- Internal roads, landscaping, irrigation, septic system, and 4 water quality/detention basins

Phased Development Plan (15 Years Total):

Phase 1 (Year 1):

- Build internal roads, CCF, caretaker's residence, equipment shed, 3 basins
- Develop 7.8 acres for approximately 6,230 plots
- Prepare chapel pad (building constructed later)

Phase 2 (Years 2–10):

- Develop 9.9 acres for approximately 6,500 plots
- Requires ~30,500 cubic yards of fill material

Phase 3 (Years 11–15):

- Develop 7.2 acres for approximately 5,900 plots

- Requires approximately 74,000 cubic yards of fill material

South Coast AQMD Comments

South Coast AQMD Air Permits and Role as a Responsible Agency

If development of a Project requires the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required. The final CEQA document, should include a discussion about the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201 – Permit to Construct,¹ Rule 203 – Permit to Operate,² Rule 401 – Visible Emissions,³ Rule 402 – Nuisance,⁴ Rule 403 – Fugitive Dust,⁵ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,⁶ Rule 1113 – Architectural Coating,⁷ Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,⁸ Regulation XIII – New Source Review,⁹ Rule 1401 – New Source Review of Toxic Air Contaminants,¹⁰ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,¹¹ Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,¹² etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD

¹ South Coast AQMD. Rule 201 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

² South Coast AQMD. Rule 203 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

³ South Coast AQMD. Rule 401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

⁴ South Coast AQMD. Rule 402 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

⁵ South Coast AQMD. Rule 403 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

⁶ South Coast AQMD. Rule 1110.2 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

⁷ South Coast AQMD. Rule 1113 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

⁸ South Coast AQMD. Rule 1166 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

⁹ South Coast AQMD. Regulation XIII available at:

<https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

¹⁰ South Coast AQMD. Rule 1401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

¹¹ South Coast AQMD. Rule 1466 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

¹² South Coast AQMD. Rule 1470 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final CEQA document. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final CEQA document. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Jivar Afshar, Air Quality Specialist, at jafshar@aqmd.gov should you have any questions.

Sincerely,

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SW:JA

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