# Memorandum

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**Date:** **February 15, 2022**

**Project:** **Lakeside Memorial Lawn Crematorium**

**RE:** **Topical Responses to Comments (public review draft Initial Study/Mitigated Negative Declaration)**

**Aesthetics**

Neither the project site nor the surrounding areas are scenic vistas due to the presence of existing nearby commercial and residential developments. Further, neither the project site, nor views to or from the project site, have been designated as important scenic resources by the City of Folsom or any other public agency. Additionally, the site of proposed modifications is already largely shielded from public view due to the presence of dredge tailing piles and would remain so. Therefore, the proposed development would not interfere with or degrade a scenic vista, and no impact would occur.

The crematory would be placed inside a metal structure that already exists on the property and is already mostly shielded from public view. The only external modifications would be the addition of two 250-gallon propane tanks on a concrete pad near the edge of the building and the addition of a small exhaust stack to the roof of the shed. This stack would be approximately 19.5 feet above grade and would project approximately 10 feet above the existing roof of the shed. This physical improvement to an already existing metal structure would not significantly impact the visual character of the project setting. An existing wooden fence would shield the propane tanks from view from the publicly used areas of the cemetery.

**Air Quality**

Criteria pollutant and precursor emissions for long-term operation of the proposed crematory were calculated using propane combustion emissions factors from the USEPA AP-42 Compilation of Emissions Factors Chapter 1.5, and crematory emissions factors provided by the Sacramento Metropolitan Air Quality Management District (SMAQMD), which combined USEPA AP-42 data and the USEPA Factor Information Retrieval Program.

Potential health risks to nearby sensitive receptors from the emission of toxic air contaminants (TACs) during operation of the proposed crematory were analyzed after consultation with the SMAQMD and in accordance with the Office of Environmental Health Hazard Assessment (OEHHA) *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*.

Localized concentrations of TACs were modeled using Lakes AERMOD View version 9.8.3 and the California Air Resources Board's (CARB's) Hotspots Analysis and Reporting Program (HARP), Air Dispersion Modeling and Risk Tool (ADMRT) version 19121. SMAQMD provides two sets of

meteorological data files for use with AERMOD: one for the Sacramento International Airport and one for the Sacramento Executive Airport. Data for the Executive Airport was recommended for use by SMAQMD staff (provided by Venk Reddy on 8/28/2019).

Though it is uncertain whether the exhaust stack will include a rain cover, for the purposes of dispersion modeling, assuming a rain cover is installed on the crematorium exhaust stack is the more conservative approach. The rain cover would limit the initial dispersion of the exhaust gases, thereby resulting in increased concentrations near the source. Without a rain cover, the exhaust may travel farther, but would result in decreased concentrations in any given volume of air. These decreased concentrations would result in decreased exposure and health risks.

HELIX's coordination with Sacramento Metropolitan Air Quality Management District (SMAQMD) began in August 2019 when HELIX's Senior Air Quality Specialist, Victor Ortiz, reached out to SMAQMD Air Quality Engineer, Venk Reddy, via phone. Ongoing coordination via phone and email with SMAQMD staff, including Venk Reddy, Karen Huss, Steve Mosunic, and Brian Krebs, continued through the end of October 2021. Initial coordination included discussion of SMAQMD approved methodologies, models, and emission factors for use in quantifying emissions and risks associated with crematory operations. Mr. Reddy provided Mr. Ortiz with the SMAQMD approved toxic air contaminant (TAC) emission rates and the recommended meteorological data for use in the AERMOD dispersion model. In the late spring of 2021, Mr. Reddy and his team conducted a review of HELIX'S AERMOD and HARP modeling files used in the health risk assessment (HRA). All comments made by Mr. Reddy following his review dealt with confirming manufacturer specs included in the modeling. Items specifically called out, including exhaust flow rate, physical dimensions of the equipment, and hourly burn rate, were provided by Hartwick Combustion Technologies, Inc.

The HRA examined risks to the human population as required by CEQA. Both inhalation of gaseous TACs and oral consumption of deposited TACs were examined. The exposure duration was set to 30 years beginning with infants in utero in the third trimester of pregnancy, in accordance with OEHHA guidelines. All risks were found to be below the CEQA significance thresholds.

Criteria pollutant emissions are compared to the SMAQMD thresholds of significance, which are established with the goal of helping the SMAQMD attain the ambient air quality standards. These standards are designed to protect people most sensitive to respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. By resulting in emissions less than the thresholds developed to attain the standards aimed at protecting the most sensitive populations, the project's criteria pollutant emissions are not expected to result in adverse health effects on said populations.

**Cultural and Tribal Cultural Resources**

The presence of the nearby historic Chinese cemeteries was acknowledged in Section 5.1 of the required confidential cultural resources technical study prepared for the project, which was used to support the IS/MND. However, these cemeteries are not located within the project area. At their closest points, the Chung Wah Cemetery is located approximately 263 feet southwest of the project area, and the Young Wo Cemetery is located approximately 847 feet north of the project area. The local historical significance of the Lakeside Cemetery itself and its origins and historic use extending back to 1846 were addressed in Section 3.5.4 of the confidential cultural resources study prepared for the project.

The use of a crematorium would be exclusively within the boundaries of an existing facility in the modern portion of the cemetery. The cemetery complex in the immediate area already reflects several different religious or cultural funerary practices, including Chinese, Jewish, Masonic, Odd Fellows, and others. Introducing a crematorium is not the first time a new funerary practice was introduced to the cemetery area.

The project would not create an adverse effect on significant historical cemeteries and resources. The project area does not contain any historical graves or interments and the confidential cultural resources survey of the project area failed to identify any historic or cultural resources within its footprint. No changes to the existing adjacent or nearby cemeteries or mine tailings will occur as a result of the project. The crematorium equipment will be housed within an existing shed and there will be no visible or physical change to the surrounding area. None of the features of the historic or modern portions of the cemetery will be affected.

The visibility of the proposed stack does not have a direct effect on the historical significance of the historic cemeteries, especially as there is no visible exhaust and no deposition of cremated remains. The qualities that make the cemeteries significant are the aspects of integrity of setting, feeling, and association (according to the National Registration Form for the Chung Wah cemetery). The footprint of the proposed project is minor and would not result in an impact on the project site's integrity, setting, and feeling.

**Hazards and Emergency Evacuation**

The City of Folsom Fire Department provides fire protection services. There are four fire stations providing fire/rescue and emergency medical services within the City of Folsom with a fifth station planned near the eastern city limits. Station 35 is the nearest station to the project site and is located at 535 Glenn Drive, approximately 1.5 miles east of the project site. Station 36 is second nearest to the project site and is located at 9700 Oak Avenue, approximately 2.3 miles north of the project site. The project site is easily accessible to fire service personnel. Consistent with the City's Multi-Hazard Emergency Management Plan, the City of Folsom maintains pre-designated emergency evacuation routes along major streets and thoroughfares.

The project is not located in or near a State Responsibility Area or in a Very High Fire Hazard Severity Zone. Vegetation on the property is irrigated and includes maintained lawns and well-spaced trees with a generally open canopy and limbs pruned near ground level. Furthermore, the project is subject to standard structural separation requirements from the Fire Department with regards to the crematorium's distance to the propane tanks and potentially flammable material.

**Land Use and Planning**

Cemeteries are a permitted use within the OS/P Primary Area upon approval of a Conditional Use Permit (CUP) per Section 17.52.550 of the FMC. The subject cemetery has been in operation since the 1800's and pre-dates the requirement for a CUP. The cemetery did receive a CUP for operation of a mausoleum in 1995. The proposed crematory would be operating as an accessory use to the existing cemetery, not as a stand-alone business.

In this case, the cemetery is the primary or principal use and the applicant is proposing a crematorium as an accessory use to the existing cemetery. As proposed, the crematorium would be subordinate in area, extent, and purpose to that of the existing cemetery. It would provide a service related to and

supportive of the service already provided by the cemetery and mausoleum. It would be located on the same lot and in the same zoning district as the principal use. It would be owned and operated by the same people who own and operate the existing cemetery and mausoleum. As such, a crematory can be considered as an accessory use subject to a CUP.