

**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  
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