**October 28, 2011**

**Re: Draft Environmental Impact Report (DEIR) for proposed Creekside Memorial Park Cemetery (LP05-2096)**

**Appendix I: Discrepancies between Table 1.0-1 "Summary of Impacts and Mitigation Measures for the Creekside Memorial Park Cemetery EIR", found on pages 1.0-6 through 1.0-61, and the detailed discussion in section 3 of the DEIR. Differences highlighted.**

| Impact / Mitigation | As shown in Table 1.0-1 | As shown in Section 3 (note that the numbers to the left of the lines are line numbers from the DEIR) |
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| Impact 3.8-2 | **Impact 3.8-2: Wildland Fires:** The upper areas of the site are considered areas subject to wildland fires. The Project Sponsor has indicated they intend to continue cattle grazing as a method of controlling vegetative build-up.<br><br>(page 1.0-45) | 39 **Impact 3.8-2: Wildland Fires:** This Project is deemed a high-risk land-use due to the location of the<br>40 Project within a wildland area. This Project is located in State Responsibility Area as designated by the State<br>41 Board of Forestry and Fire Protection. This Project location is designated as a Fire Hazard Severity Zone<br>42 as determined by the State of California.<br><br>(page 3.8-9) |
| Mitigation Measure 3.8-2 (Table 1), Mitigation Measure 3.8-2(a) (Section 3.8) | **Mitigation 3.8-2:** Grazing shall be consistent with the Mitigation Measures 3.4-2a and 3.4-2b (Bioligical Resources).<br><br>(page 1.0-45) | 44 ***Mitigation 3.8-2(a):*** *Grazing shall be consistent with the Mitigation Measures 3.4-2a and 3.4-2b*<br>45 *(Biological Resources).*<br><br>(page 3.8-9) |
| Mitigation Measure 3.8-2(b)(Section 3.8) | Not included in Table 1.0-1 | 47 ***Mitigation 3.8-2(b):*** *The following measures will reduce the impact of wildland fires considered a*<br>48 *potentially significant Project impact. The Fire Protection District will have final review over the*<br>49 *Project's compliance with the following measures:*<br>50 *a. The Applicant shall provide a Fire Protection Plan that will minimize and mitigate the fire risk* |

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| | | *to life and property loss created by this Project. The plan shall address but not be limited to: fuel management, defensible space, access within the facility, access to open space, water supply, evacuation, weather conditions, prevention of ignition and ignition-resistant construction. b. All structures shall be constructed with Class A fire retardant roofing.*<br><br>*c. Fire hydrants shall be located along the required access road of the Upper Garden. d. The Fire Protection District shall review all Fire Protection District access roads. Access roads that do not meet Fire Protection District standards shall be subject to the concurrent approval of the Fire Protection Plan. Maximum grade for Fire District access roads shall not exceed 15%. e. Parking areas shall be clearly marked. f. In addition to maintaining the existing fire trail system, additional fire trails may be required to provide access to open space. In the event that additional fire trails are required, the project biologist and Fire Protection District shall work in collaboration with each other to ensure that any additional fire trails will not pose a significant impact to special status species.*<br><br>Implementation of the mitigation measures recommended specifically for the Creekside Memorial Park Cemetery Project will ensure that the potential for wildland fires is reduced to less than significant levels.<br><br>(page 3.8-9,10) |

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| Mitigation Measure 3.9-2e | **Mitigation Measure 3.9-2e: Consistent with Contra Costa Environmental Health permits and regulations, w**ater quality sampling and analysis of specified bacteriological and chemical parameters shall be required as part of any groundwater supply development<br><br>program for a small community water system. Potable water for domestic uses of the project should be provided from the well with the best water quality. As a transient small water community system, regular water quality sampling will be required by the State; this information also will be provided to the designated geologist/hydrogeologist. Increased frequency of sampling and an expanded list of analytes may be recommended by the geologist/hydrogeologist in the annual report submitted to the County.<br><br>(page 1.0-48) | 32 ***Mitigation Measure 3.9-2e:*** *Consistent with Contra Costa Environmental Health permits and*<br>33 *regulations, water quality sampling and analysis of specified bacteriological and chemical*<br>34 *parameters shall be required as part of any groundwater supply development program for a small*<br>35 *community water system. Potable water for domestic uses of the Project should be provided from*<br>36 *the well with the best water quality. As a transient small water community system, regular water*<br>37 *quality sampling will be required by the State.*<br><br>(page 3.9-27) |
| Mitigation Measure 3.9-3a | **Mitigation Measure 3.9-3a:** Reduce the long-term water demand by:<br>• Decreasing the area and density of plants in the riparian corridor and oak/buckeye woodland<br>• Decreasing the area of the traditional cemetery landscaping<br>• Decreasing the number of cattle and installing water-saving plumbing (e.g., ULF toilets)<br>• Decreasing the watering requirements of the traditional cemetery landscaping through installation of low-water use grass and plant species and through implementation of landscape water conservation best management practices.<br>• Maximizing the recharge capability of re-built soils on graded areas, for example with soil amendments and mulch, and maintaining the recharge capability with rangeland best management practices<br>• Increasing the recharge capability of the stormwater detention facilities, for example, delete impermeable liner under vegetated swales.<br><br>(page 1.0-49) | 21 ***Mitigation Measure 3.9-3a:*** *In coordination with Mitigation Measure 3.4-2d and 3.4-11a-d*<br>22 *(Biological Resources) reduce the long-term water demand by:*<br>23 • *Decreasing the area and density of plants in the riparian corridor and oak/buckeye*<br>24 *woodland*<br>25 • *Decreasing the area of the traditional cemetery landscaping*<br>26 • *Decreasing the number of cattle as specified in Mitigation Measure 3.9-2d and installing*<br>27 *water-saving plumbing (e.g., ULF toilets)*<br>28 • *Decreasing the watering requirements of the traditional cemetery landscaping through*<br>29 *installation of low-water use grass and plant species and through implementation of*<br>30 *landscape water conservation best management practices.*<br>31 • *Maximizing the recharge capability of re-built soils on graded areas, for example with soil*<br>32 *amendments and mulch, and maintaining the recharge capability with rangeland best*<br>33 *management practices* |

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| | | 34 • *Increasing the recharge capability of the stormwater detention facilities, for example,*<br>35 *delete impermeable liner under vegetated swales.*<br><br>(page 3.9-29) |
| Mitigation Measure 3.9-3b (Table 1), 3.9-3c (Section 3.9) | **Mitigation Measure 3.9-3b:** Design and implement a phased groundwater supply development program. The program shall be developed and supervised by a qualified registered geologist or certified hydrogeologist.<br><br>The development program shall guide well siting, design, and operation and shall provide an estimate of long-term supply for onsite uses under average rainfall, short-term extreme drought, and multi-year drought conditions. Development of water demands (e.g., landscaping) shall be contingent on demonstration of reliable groundwater supply. The development program shall utilize available hydrogeologic information gained from the groundwater monitoring and reporting program (Mitigation Measure 3.9-1c) and from the well drilling and testing program (Mitigation Measure 3.9-2a) and shall apply appropriate hydrologic analyses (e.g., groundwater modeling) to guide groundwater supply development that allows beneficial use of onsite groundwater resources while minimizing long-term impacts.<br><br>(page 1.0-49, 50) | 49 ***Mitigation Measure 3.9-3c:*** *Prior to construction of improvements or issuance of construction*<br>50 *permits, the applicant shall submit a plan for a phased groundwater supply development*<br>51 *program, which shall be subject to final review and approval by the Zoning Administrator.*<br>52 *Leading up to the review and approval by the County a program shall be developed and*<br>*1 supervised by the Project Hydrogeologist. That program shall be reviewed by an independent*<br>2 *hydrogeologist hired by the County (and paid for by the Project Sponsor). The phased*<br>3 *groundwater supply development program shall guide well siting, design, and operation and shall*<br>4 *provide an estimate of long-term supply for on-site uses under average rainfall, short-term*<br>5 *extreme drought, and multi-year drought conditions. Development of water demands (e.g.,*<br>6 *landscaping) shall be contingent on demonstration of reliable groundwater supply. The*<br>7 *development program shall utilize available hydrogeologic information gained from the*<br>8 *groundwater monitoring and reporting program (Mitigation Measure 3.9-3d) and from the*<br>9 *monitoring well program (Mitigation Measure 3.9-3b) and shall apply appropriate hydrologic*<br>10 *analyses (e.g., groundwater modeling) to guide groundwater supply development that allows*<br>11 *beneficial use of on-site groundwater resources while minimizing long-term impacts.* |

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| | | (page 3.9-29, 30) |
| Mitigation Measure 3.9-3b (Section 3.9) | Not included in Table 1.0-1 | ***Mitigation Measure 3.9-3b: Develop a monitoring well.*** *Prior to construction of improvements or issuance of grading or construction permits, the Project Sponsor shall submit a plan for siting, design, installation and development of a monitoring well. This well shall be installed on site, as far as possible downstream and shall serve as a dedicated monitoring well for groundwater levels. The well shall be sited, designed, constructed, and developed by the Project Sponsor's hydrogeologist (herein "Project Hydrogeologist"). The Project Hydrogeologist shall prepare monitoring protocols and procedures, including frequency of monitoring, measurement methodology, and procedures for data management, reporting, and data quality assurance/quality control. The siting, design, construction, development and monitoring protocols and procedures shall be reviewed by an independent hydrogeologist hired by the County (and paid for by the Project Sponsor).*<br><br>(page 3.9-29) |
| Mitigation Measure 3.9-3c (in Table 1), Mitigation Measure 3.9-3d (in section 3.9) | **Mitigation Measure 3.9-3c:** Develop and implement a groundwater monitoring and reporting program that includes at least quarterly measurement of static water levels in selected wells. The monitoring program shall be developed and supervised by a qualified registered geologist, certified hydrogeologist, or professional engineer. The program shall be continued until groundwater levels have stabilized for at least three years. The program shall specify water level measurement, data collection, and reporting protocols and procedures. Water quality sampling may be included. All onsite wells shall be surveyed and well locations shall be mapped. Neighboring wells may be included upon agreement with the well owner. Monthly pumping amounts shall be measured. Brief annual reports shall be | ***Mitigation Measure 3.9-3d:*** *Develop and implement a groundwater monitoring and reporting program that includes sufficient water wells and monitoring wells to fully characterize groundwater levels. The program shall provide at least quarterly measurement of static water levels in selected wells. The monitoring program shall be developed and supervised by the Project Hydrogeologist. The program shall be reviewed by an independent hydrogeologist hired by the County (and paid for by the Project Sponsor). The program shall be continued until full buildout of improvements have occurred (including all landscaping) and groundwater* |

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| | prepared and submitted to Contra Costa Environmental Health Services. In the third year, the annual report shall provide a specific recommendation (with justification) on whether or not the monitoring program shall be continued. The monitoring program shall be coordinated with monitoring of aquatic habitats, including submittal of the groundwater monitoring report to the biologist conducting the aquatic monitoring and the Contra Costa County Community Development Department.<br><br>(page 1.0-50) | *levels have stabilized for a minimum*<br>20 *of at least three years, or more, as determined by the Project Hydrogeologist. The program shall*<br>21 *specify water level measurement, data compilation, and reporting protocols and procedures.*<br>22 *Water quality sampling may be included (both groundwater and surface waters of Tassajara*<br>23 *Creek). All on-site wells shall be surveyed and well locations shall be mapped. Neighboring wells*<br>24 *may be included upon agreement with the well owner, with the understanding that monitoring*<br>25 *information will be available to the public. For on-site wells, monthly pumping amounts shall be*<br>26 *measured. Brief annual reports shall be prepared and submitted to Contra Costa Environmental*<br>27 *Health Services. In the third year after full buildout of the Project Site, the annual report shall*<br>28 *provide a specific recommendation (with justification) on whether or not the monitoring program*<br>29 *shall be continued. The monitoring program shall be coordinated with monitoring of aquatic*<br>30 *habitats, including submittal of the groundwater monitoring report to the biologist conducting the*<br>31 *aquatic monitoring and to the Contra Costa County Department of Conservation & Development.*<br>32 *Final approval shall rest with the County's Zoning Administrator.*<br><br>(page 3.9-30) |
| Impact 3.9-4 | **Impact 3.9-4: Interference with Pre-Existing Nearby Wells:** The proposed project would utilize groundwater from wells on the property. Currently four wells are located on the property. The number of wells needed to meet the estimated water demand of 45 AFY would range from 4 to 12 wells; additional wells would be needed for backup, depending on the amount of planned storage. The location of additional wells has not been determined. While the existing wells are all located in the Tassajara Valley, wells could be located throughout the | 45 **Impact 3.9-4: Interference with Pre-Existing Nearby Wells:** The Proposed Project would utilize<br>46 groundwater from wells on the property. Currently four wells are located on the property, as shown in<br>47 Figure 3.9-3. The number of wells needed to meet the estimated water demand of 45 AFY would range<br>48 from 4 to 12 wells; additional wells would be needed for backup, depending on the amount of planned |

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| | property. Based on pumping test data, wells should be located at least 100 feet from other wells, the property lines and environmentally sensitive areas, such as Tassajara Creek and wetlands. This would minimize short-term drawdown impacts of pumping. However, long-term pumping of the wells to provide 45 AFY would cause depletion of groundwater storage, declines in groundwater level declines, and a decrease in downstream subsurface outflow.<br><br>(page 1.0-51) | 49 storage. The location of additional wells has not been determined. While the existing wells are all located<br>50 in the Tassajara Valley, wells could be located throughout the property. Long-term pumping of the wells to<br>51 provide 45 AFY has a substantial potential to cause depletion of groundwater storage, declines in<br>52 groundwater levels, and a decrease in downstream subsurface outflow.<br><br>(page 3.9-30) |
| Mitigation measure 3.9-4a (Table 1), Mitigation Measure 3.9-4 (Section 3.9) | **Mitigation Measure 3.9-4a:** Develop and implement a well drilling and testing program. The drilling and testing program shall be developed and supervised by a qualified registered geologist or certified hydrogeologist. The program shall include siting and design, aquifer testing, and water sampling and analysis of all new wells planned for installation over the two years of project development. Pumping tests shall include monitoring of neighboring wells within 100 feet of the test well, with permission of the well owner. Unless otherwise demonstrated by pumping test data, wells should be located at least 100 feet from other wells, the property lines and environmentally sensitive areas (such as Tassajara Creek and wetlands) to minimize drawdown impacts of pumping. The aquatic biologist shall inspect potential well locations and advise on potential impacts to any aquatic habitats. Well yields may be expected to range between 3 and 30 gpm. Well construction would include a minimum of 6-inch diameter well casing (PVC or Steel) with properly designed perforations. (The 6-inch casing shall provide additional water storage.) Monitoring of neighbors well shall be triggered if the neighbor requests it or static water level drops of 10 feet or more. Each test and production well shall be fully documented in a well report that shall be submitted to Contra Costa County Environmental Health Services.<br><br>(page 1.0-51) | ***Mitigation Measure 3.9-4:*** *Develop and implement a production well drilling and testing*<br>55 *program. The drilling and testing program shall be developed and supervised by the Project*<br>1 *Hydrogeologist. The program shall include siting and design, aquifer testing, and water sampling*<br>2 *and analysis of all new production wells planned for installation over the two years of Project*<br>3 *development. That program shall be reviewed by an independent hydrogeologist hired by the*<br>4 *County (and paid for by the Project Sponsor. Pumping tests shall include monitoring of the*<br>5 *monitoring well (Mitigation Measure 3.9-3b) and neighboring wells within 100 feet of the test well,*<br>6 *with permission of the well owner. Unless otherwise demonstrated by pumping test data, wells*<br>7 *should be located at least 100 feet from other wells, the property lines and environmentally*<br>8 *sensitive areas (such as Tassajara Creek and wetlands) to minimize drawdown impacts of*<br>9 *pumping. The aquatic biologist shall inspect potential well locations and advise on potential*<br>10 *impacts to any aquatic habitats. Well yields may be expected to range between 3 and 30 gpm.*<br>11 *Well construction would include a minimum of 6-inch diameter well casing (PVC or Steel) with*<br>12 *properly designed perforations (The 6-inch casing shall* |

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| | | *provide additional water storage).*<br>13<br>14 *Each test and production well shall be fully documented in a Well Report that shall be submitted*<br>15 *to Contra Costa County Environmental Health Services and Department of Conservation &*<br>16 *Development Zoning Administrator. The Well Reports shall address potential impacts of*<br>17 *Proposed Project pumping on existing neighboring wells. This includes short-term pumping*<br>18 *(drawdown) impacts and long-term impacts of groundwater pumping, including dry season and*<br>19 *drought conditions. The significance of potential impacts shall be assessed consistent with*<br>20 *Appendix G (i.e., the production rate of pre-existing nearby wells would drop to a level which*<br>21 *would not support existing land uses or planned uses for which permits have been granted).*<br><br>(page 3.9-30 and 31) |
| Mitigation Measure 3.9-4b (Table 1) | **Mitigation Measure 3.9-4b:** In the first three years of the monitoring program, a procedure shall be implemented wherein a neighboring well owner can report well yield or quality problems to the designated geologist/hydrogeologist. If the well problems are reasonably associated with the proposed project, the geologist/hydrogeologist shall conduct a focused investigation of the cause of the problem and shall recommend one or more solutions in a technical memorandum to Contra Costa County Environmental Health Services, copied to the affected well owner and cemetery operator. The affected well owner shall provide available information on the affected well, including water level and water quality data, the DWR water well drillers<br><br>report, and information on well operation. The well owner also should provide the geologist/hydrogeologist with access to the well for inspection. Recommended solutions may include lowering of the pump, well | Not included in Section 3.9 |

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| | deepening, well replacement, or operational change in cemetery well operations. The project proponent shall bear the costs related to the project impacts. After three years, the geologist/hydrogeologist shall provide a report to Contra Costa County Environmental Health Services summarizing remedial actions and providing a recommendation to continue or discontinue the program.<br><br>(page 1.0-51, 52) | |
| Mitigation Measure 3.9 (Section 3.9) | Not included in Table 1.0-1 | 11 ***Mitigation Measure 3.9:*** *Implement mitigation measures 3.9-1a – 3.9-1b, 3.9-2a – 3.9-2e, 3.9-*<br>12 *3a – 3.9-3d, and 3.9-4ab. Monitoring of groundwater and stream quantity and quality would allow*<br>13 *documentation of current conditions (establishing a baseline) and detection or tracking of quantity*<br>14 *declines and quality deterioration. Implementation of watershed management BMPs would aid in*<br>15 *maintaining groundwater recharge and water quality. Implementation of water conservation BMPs*<br>16 *would manage water demands.*<br><br>(Page 3.9-33) |
| Impact 3.10-1 | **Impact 3.10-1: Consistency With Land Use Plans:** The cemetery project is consistent with the zoning for the site and is generally consistent with all of the General Plan policies. The potential for exceeding the available water supply is considered to be a significant unavoidable impact, and is discussed in more detail in the Hydrology Section 3.9. This is a potentially significant impact. Similarly, the potential for the project, as currently designed, to have a cumulative impact on local wells is also a potentially significant impact. These concerns are more fully addressed in Impacts 3.9-1, 3.9-2 and 3.9-5.<br><br>(page 1.0-52) | 48 **Impact 3.10-1: Consistency With Land Use Plans:** The Cemetery Project is consistent with the zoning<br>49 for the Project Site and is generally consistent with all of the General Plan policies. It is possible for a project<br>50 to conflict with specific policies while maintaining consistency with the intent and direction General Plan<br>51 goals, when considered in the overall planning context. The Project is consistent, after mitigation measures<br>52 are implemented, with all but a few policies.<br>53<br>54 Policy 8-76 of the Water Resources Element states, “Ensure that land uses in rural areas be consistent with<br>55 the availability of groundwater resources.”<br>1<br>2 The potential for exceeding the available water supply is |

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| | | considered to be a significant unavoidable impact,<br>3 and is discussed in more detail in the Hydrology Section 3.9. This is a potentially significant impact.<br>4<br>5 Similarly, the potential for the Project, as currently designed, to have a cumulative impact on local wells is<br>6 also a potentially significant impact. These concerns are more fully addressed in Impacts 3.9-2, 3.9-3 and<br>7 3.9-4.<br><br>(Page 3.10-8, 9) |
| Mitigation measure 3.10-1 | **Mitigation Measure 3.10-1:** See Mitigation Measures 3.9-1, 3.9-2 and 3.9-5.<br><br>(page 1.0-52) | 9 ***Mitigation Measure 3.10-1:*** *See Mitigation Measures 3.9-2, 3.9-3 and 3.9-4.*<br><br>(Page 3.10-9) |
| Impact 3.12-1 (Table 1) | **Impact 3.12-1: Wildland Fires:** Most of the project site and the surrounding area include open grasslands. The location of the cemetery buildings adjacent to undeveloped grasslands could increase the chance of wildland fires spreading into the wildland. The project proposes to provide two paved accesses that meet Fire Code standards (project plans show streets at 32‟ wide). The hazard associated with a possible wildland fire would be considered a potentially significant project impact.<br><br>(page 1.0-55) | Not included in Section 3.12 |
| Mitigation Measure 3.12-1 (Table 1) | **Mitigation Measure 3.12-1:** The following measures (identified by the SRVFPD) will reduce the risk of wildland fires:<br>a. Maximum grade for an emergency access road shall not exceed 20 percent and grades in excess of 15 percent shall be grooved concrete surfaces. Emergency vehicle access (EVA) shall meet the requirements for fire department access as indicated in the Fire Code (minimum width of 20 feet with an all-weather road surface capable of supporting the imposed weight of fire department apparatus).<br>b. The SRVFPD shall reserve the right to review the | Not included in Section 3.12 |

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| | development plan as it relates to the existing fire trail system. Firefighting equipment access shall be provided to all areas of the project site in accordance with fire access standards of the SRVFPD and the adopted California Fire Code.<br>c. All structures shall be constructed with fire retardant roofing and interior sprinklers and landscaping around structures be designed to minimize the interface between grassland areas and structures (e.g., fire resistant vegetation).<br>d. An open space fire management plan shall be prepared which shall include a fire safety component (to keep fire risk at reasonable levels in open space areas) subject to the approval of the SRVFPD. The plan shall identify vegetation mitigation and control, maintenance intervals and responsibility, restrictions on vehicle access, water supply and long-term risk management. Minimum standards for plan review are available from the SRVFPD.<br>e. The SRVFPD shall review and approve (with respect to fire vehicle access) the development plan relative to any roads less than 36 feet wide (in order that minimum street widths, on-street parking lanes and shoulders accommodate the passage of emergency vehicles). Roadways less than 36 feet<br><br>shall have restricted parking and shall be posted as required by the California Vehicle Code for a fire lane.<br>Implementation of the mitigation measures recommended specifically for the Creekside Memorial Park project will ensure that the potential for wildland fires is reduced to less than significant levels.<br><br>(page 1.0-55, 56) | |
| Impact 3.12-2 (Table 1), Impact 3.12-1 (Section 3.12) | **Impact 3.12-2: Fire Protection:** Construction of the Proposed Project would increase the demand for fire protection services. Development will be required to meet the basic requirements of the Fire District, and development of this type (a cemetery) is not expected to substantially increase the risk of fire. While current facility personnel and equipment are adequate, the following measures, required by the SRVFPD, will ensure the impacts are | 21 **Impact 3.12-1: Fire Protection:** The SRVFPD reviewed the Project to determine whether this Project<br>22 would exceed, or significantly impact, their ability to provide services. At this time Fire Station #36 (a new<br>23 station at the corner of Camino Tassajara and Lusitano) would be the primary responding unit to the |

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| | less than significant.<br><br>(page 1.0-56) | Camino Tassajara areas with additional resources provided by Fire Station #30 and Fire Station #35. The response times to the Camino Tassajara area from Station #36 will exceed 5 minutes total response time and exceed the recommended 1.5 miles in the General Plan.<br><br>Given a rural area designation, response time studies conducted by the Fire District using GIS, the entire Camino Tassajara area could be served from Station #36 and the Blackhawk Fire Station #35 and Dougherty Valley Station #30. However, the response times to this area from Station #36 for both the new and existing locations could exceed 5 minutes. As proposed, the Project would be consistent with General Plan 7-63 due to the rural designation. Given these considerations a new location or a location closer to the Windemere Parkway is desirable.<br><br>The Proposed Project, due to the increased number of visitors to the Project Site, would increase the demand for fire, emergency and medical response services. The activities associated with the Project and the extended emergency response times would be considered a potentially significant Project impact. The SRVFPD has stated that the Proposed Project is a high-risk land-use due to the proposed activities including, but not limited to, outdoor public assembly within native vegetation designated as a hazardous fire area, wildland fire hazards, use of equipment that may produce an ignition source, reduced road widths that do not meet Fire District access requirements, private water storage for fire fighting and fire protection systems, and extended response times for emergency response equipment. In addition, the Proposed Project includes seating accommodations for 316 people not including outdoor public assemblies and accommodations for more than 200 vehicles, not including the upper garden which |

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| | | results in an increased demand on services and additional emergency evacuation considerations. The proposed access road of 24' does not meet Fire District standards. Parking areas along the road are not provided.<br><br>(Page 3.12-6) |
| Mitigation Measure 3.12-2 (Table 1), Mitigation Measure 3.12-1 (Section 3.12) | **Mitigation Measure 3.12-2:** Prior to issuance of building permit, the applicant shall provide evidence (stamped plans by the appropriate Fire District) that the appropriate Fire District has approved the proposed development for compliance with all Fire District requirements. Implementation of the mitigation measures recommended for the Creekside Memorial Park project will ensure that any impacts to fire protection will be reduced to less than significant levels.<br><br>(page 1.0-56) | ***Mitigation Measure 3.12-1:*** *Prior to issuance of building permit, the Project Sponsor shall provide evidence (stamped plans by the appropriate Fire District) that the appropriate Fire District has approved the proposed development for compliance with all Fire District requirements.*<br>*1. Provide a Fire Station site that may be used for the construction of a future fire station. The facility (as yet unplanned) will be the subject of independent CEQA review as deemed appropriate by the Lead Agency.*<br>*1 2. The Project Sponsor shall provide a Fire Protection Plan that will minimize and mitigate the fire risk to life and property loss created by this Project. The plan shall address but not be limited to; fuel management, defensible space, access within the facility, access to open space, water supply, evacuation, weather conditions, prevention of ignition, and ignition resistant construction and other standard Fire District conditions of approval.*<br>*3. All structures shall be required to install an automatic fire sprinkler system.*<br>*4. Staff members shall be trained in CPR/First Aid. Automatic-external defibrillators shall be provided in areas of public assembly.*<br>*5. All construction and operational permits required by the Fire District shall be reviewed and approved prior to obtaining a permit for the Building Department to construct.*<br>*6. Any modifications to the required Fire District access* |

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| | | *standards are subject to approval based on the conditions and requirements that will be considered in the review and approval of the Fire Protection Plan.*<br><br>(page 3.12-6, 7) |
| Mitigation Measure 3.12-2 (Section 3.12) | Not included in Table 1.0-1 | ***Mitigation Measure 3.12-2:*** *The Project shall comply with the following measures:*<br>*1. The required storage capacity shall be dedicated for fire flow. The Project Sponsor shall develop a maintenance program to ensure the required capacity is available and the entire system is operational. The maintenance program shall be subject to review and approval of the Fire District.*<br>*2. All structures shall be required to install an automatic fire sprinkler system.*<br><br>(page 3.12-7) |
| Impact 3.12-3 (Table 1), Impact 3.12-2 (Section 3.12) | **Impact 3.12-3: Fire Flow:** The project would result in an increased water demand for fire flow requirements necessitating the construction of new facilities to meet the fire flow requirement demands of the Proposed Project site. The Project is located outside of the service area of any public water purveyor. Fire flow shall be provided via the 332,500 gallon (amount dedicated to firefighting and fire sprinkler system) distribution system. Improvements occurring with development of the Proposed Project would be designed to accommodate the increased demand for water to meet the fire flow standards as noted in Mitigation 3.12-2, above. This is a potentially significant impact.<br><br>(page 1.0-56) | **Impact 3.12-2: Fire Flow:** The Project would result in an increased water demand for fire flow requirements in accordance with the SRVFPD Fire Code as set forth for the protection of structures. The Project proposes to provide a private water system. The water storage capacity will be determined based on the largest building that includes a reduction in fire flow of 50% for the installation of an automatic fire sprinkler system. A private water system is considered less desirable than a water purveyor due to the limited capacity and that it is potentially less reliable.<br><br>(page 3.12-7) |
| Mitigation Measure 3.12- | **Mitigation Measure 3.12-3:** The project shall comply with Mitigation Measure 3.12-2, above. | Not included in Section 3.12 |

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| 3 (Table 1) | (page 1.0-56) | |
| Impact 3.12-4 (Table 1) | **Impact 3.12-4: Police Protection:** The Proposed Project could result in increased demand for police protection services that are provided primarily by the Contra Costa County Sheriff"s Department while current staffing levels are recognized as being lower than the standards set by the General Plan, the Proposed Project will only nominally increase calls as it is a non-residential use and nominal impact to the Department"s ability to maintain response times. The Project Sponsor shall pay any applicable fees.<br><br>(page 1.0-56, 57) | Not included in Section 3.12 |
| Mitigation Measure 3.12-4 (Table 1) | **Mitigation Measure 3.12-4:** To deter vandalism and trespassing, the Project shall install security cameras at the entry gates and perimeter fencing.<br><br>(page 1.0-56) | Not included in Section 3.12 |
| Impact 3.13-1 | **Impact 3.13-1: Impacts to Resources:** Although this is a memorial park, it is reasonable to assume that visitors to the park walk outside of the gardens, roads and entombment lawns and onto the hillside or into the riparian corridor possibly damaging flora and fauna habitat and exacerbating erosion. This is potentially a significant impact.<br><br>(page 1.0-57) | 20 **Impact 3.13-1: Impacts to Resources:** Although this Proposed Project is a cemetery, it is reasonable to 21 assume that visitors to the park walk outside of the gardens, roads and entombment lawns and onto the 22 hillside or into the riparian corridor possibly damaging flora and fauna habitat and exacerbating erosion. This 23 is potentially a significant impact.<br><br>(page 3.13-3) |
| Impact 3.14-1 (Table 1), Impact 3.14-2 (Section 3.14) | **Impact 3.14-1**: **Internal Circulation:** The Proposed Project"s internal streets would be 24 feet in width with parallel parking on one side of the roadway leaving 17 feet for vehicular travel. A letter from the San Ramon Valley Fire Protection District, dated June 27, 2006 indicates that the width of the proposed roadways is acceptable. However a condition of this acceptance is that cemetery staff assures all processions park on the same side of the road when arriving for graveside ceremonies. This will assure a clear access path in case of an emergency during a ceremony. This would be considered a less than significant impact.<br><br>(page 1.0-57) | 32 **Impact 3.14-2. Internal Circulation:** The Proposed Project's internal streets would be 24 feet in width with 33 parallel parking on one side of the roadway leaving 17 feet for vehicular travel. Communications from the 34 San Ramon Valley Fire Protection District during the Spring of 2011 indicates that the width of the proposed 35 roadways is unacceptable. Internal roadways with unrestricted are required to be 36 feet wide. Roadways 36 with parking allowed on one side are required to be 28 feet wide and roadways with no parking may be as |

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| | | narrow as 20 feet wide.<br><br>(page 3.14-14) |
| Impact 3.14-1 (Section 3.14) | Not included in Table 1.0-1 | **Impact 3.14-1. Frontage Improvements:** Frontage improvements will include pavement widening and striping on both sides of Camino Tassajara. All necessary drainage facilities, pavement transitions, and any necessary safety related improvements will be constructed. Currently the total width of the existing pavement, both northbound and southbound lanes, on Camino Tassajara is approximately 23 feet along the Project frontage. The pavement will be widened to provide 12 foot wide left turn lanes, 12 foot wide acceleration/deceleration lanes and 12 foot wide through lanes with painted medians.<br><br>(Page 3.14-14) |
| Mitigation measure 3.14-1 | **Mitigation Measure 3.14-1:** Cemetery staff shall assume that all processionals park on one side of the road to accommodate emergency vehicles.<br><br>(page 1.0-57) | ***Mitigation Measure 3.14-1:*** *Frontage improvements shall be implemented before the Project's opening day. Intersection improvements must meet the approval of the Public Works Department, including the County Traffic Engineer. The Public Works Department shall be involved early in the design process for detailed review and approval of submittals of sketch plans accompanied with the traffic analysis.*<br><br>(page 3.14-14) |
| Impact 3.14-2 (Table 1), Impact 3.14-3 (Section 3.14) | **Impact 3.14-2: Cumulative Traffic Flow Conditions:** The minor street approach of the unsignalized intersection of Camino Tassajara/Project Entry is expected to operate unacceptably at LOS F during the AM and PM peak hours.<br><br>(page 1.0-57) | **Impact 3.14-3: Cumulative Traffic Flow Conditions:** The minor street approach of the unsignalized intersection of Camino Tassajara/Project Entry is expected to operate unacceptably at LOS F during the AM and PM peak hours. However, the intersection does not meet the criteria for a signal warrant. |

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| | | (page 3.14-18) |
| Mitigation Measure 3.14-2 (Section 3.14) | Not included in Table 1.0-1 | ***Mitigation Measure 3.14-2:*** *Modifications to access roadways will be required. The required Fire District access standards are subject to approval based on the conditions and requirements that will be considered in the review and approval of the Fire Protection Plan (see Mitigation Measure 3.12-2).*<br><br>(page 3.14-14) |
| Mitigation Measure 3.14-2 (Table 1), Mitigation Measure 3.14-3 (Section 3.14) | **Mitigation Measure 3.14-2:** The intersection does not meet a signal warrant. Most of the vehicles making the critical movement exiting eastbound to the left would result from a late afternoon funeral service. The cemetery management should not allow AM or PM peak hour services to be scheduled. In some special circumstances, there may be a need to schedule services during the AM or PM peak hours (i.e., service for policemen, firemen or celebrities). In this case, motorcycle traffic control escorts should assist with all traffic movements at this intersection for the duration of the service. Therefore, any delay caused at the intersection would be minimal and would not necessitate a signal.<br>Implementation of the restricted scheduling and motorcycle escorts when necessary will reduce impacts at the Camino Tassajara/Project Entry intersection to levels of less than significant.<br><br>(page 1.0-57, 58) | ***Mitigation Measure 3.14-3:*** *Most of the vehicles making the critical movement exiting eastbound to the left would result from a late afternoon funeral service. The cemetery management shall not allow AM or PM peak hour services to be scheduled. In some special circumstances, there may be a need to schedule services during the AM or PM peak hours (i.e., service for policemen, firemen or celebrities). In this case, motorcycle traffic control escorts should assist with all traffic movements at this intersection for the duration of the service. Therefore, any delay caused at the intersection would be minimal and would not necessitate the need for signalization. .*<br><br>*Implementation of the restricted scheduling and motorcycle escorts when necessary will reduce impacts at the Camino Tassajara/Project Entry intersection to levels of less than significant.*<br><br>(page 3.14-18, 19) |
| Impact 3.15a | **Impact 3.15a:** Construction and demolition activities necessary for project development could generate significant levels of solid waste disposal (including disposal of vegetative waste and construction debris) if proper mitigation measures are not implemented. | Not included in Section 3.15 |

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| | (page 1.0-58) | |
| Mitigation measure 3.15a | **Mitigation Measure 3.15a:** The Project Sponsors shall be required to complete the construction debris recovery plan and report to demonstrate compliance with the County"s requirement for diversion of construction and demolition debris per Chapter 418-14 of the County Code. Implementation of this Mitigation Measure will help maintain the County"s waste diversion level in compliance with AB939.<br>Implementation of the mitigation recommended for the Creekside Project will ensure that the impacts related to solid waste disposal are reduced to less than significant.<br><br>(page 1.0-58) | Not included in Section 3.15 |