

**ENVIRONMENTAL ADVOCATES**  
ATTORNEYS AT LAW

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October 15, 2015

*Via U.S. Mail and Electronic Mail*

Telma Moreira  
Contra Costa County Department of Conservation and Development  
30 Muir Road  
Martinez, CA 94553  
E-mail: Telma.Moreira@dcd.cccounty.us

Re: Comments on Final Environmental Impact Report and Potential Conditional Use Permit for Creekside Memorial Park Cemetery, County File No. LP 052096

Dear Ms. Moreira and Department of Conservation and Development:

I am writing regarding the ongoing concerns with the proposed Creekside Memorial Park Cemetery Project ("the Cemetery"), County File No. LP 052096 on behalf of the Friends of Tassajara Valley, a local group of concerned citizens; and Bill and Holly Newman, neighbors who reside next to the proposed Creekside Memorial Park Cemetery Project. The Friends of Tassajara Valley and Bill and Holly Newman continue to object that the proposed mitigation measures in the Final Environmental Impact Report ("FEIR") will inadequately protect the water supplies of neighbors residing next to the Cemetery and will fail to offset the significant adverse impacts of the Cemetery. As you are aware from our prior correspondence, the Newmans have retained a highly experienced and respected hydrological consulting firm, Hydrofocus, Inc., to provide expert analysis of the Cemetery and its potential adverse impacts on local hydrology. Hydrofocus has prepared additional evaluation of the FEIR's mitigation measures and proposals for revising these mitigation measures to better reduce the Cemetery's unavoidable, significant adverse environmental impacts. Hydrofocus's comment letter on this matter is attached, which we request that the County add to the administrative record for the County's further consideration of a conditional use permit for the Cemetery.

We continue to urge that the County not issue a conditional use permit for this unnecessary and environmentally damaging project. Given California's historic ongoing drought and urgency directives from Governor Jerry Brown to conserve water and curtail existing unnecessary uses of water, it is particularly incumbent upon the County not to approve a project which would involve massive planting of new water-thirsty lawn. Such a step would be extraordinarily ironic when many local jurisdictions are removing similar landscaping from public areas in response to state

mandates to conserve water. In any case, the County should not issue a conditional use permit without imposing additional mitigation requirements in the attached Hydrofocus comment letter.

We will shortly submit additional comments expressing our additional objections on legal and policy grounds to approval of the Cemetery along the lines proposed in the FEIR.

Thank you for your consideration of our comments. Please keep us informed of the County's further processing of approval requests for the Cemetery.

Sincerely,

*Christopher a. sproul*

Christopher Sproul  
Environmental Advocates

Encl.

cc: Bill and Holly Newman