



Design Resources, Inc.

Planning ■ Engineering ■ Surveying

October 28, 2011

Demian Hardman
Contra Costa County
Department of Conservation and Development
651 Pine Street, 4th Floor – North Wing
Martinez, CA 94553 - 1229

Re: State Clearing House No. 2007012069
County File No. LP 052096
Creekside Memorial Park Cemetery
Draft Environmental Impact Report

Dear Demian,

On behalf of Corrie Development Corporation and 7000 CMP, LLC we thank you for the opportunity to review and comment on the Draft Environmental Impact Report for the proposed Creekside Memorial Park Cemetery, dated September 2011.

We offer the following comments;

- 1.) We note on page 1.0 -16, under Impact 3.4-2: Overall Impacts on Special-status Animal Species, of the Mitigation Measures, Paragraph L, Sub Section a), that the mitigation measure requires a long term management program including endowment.

It should be pointed out that in accordance with California Health and Safety Code 8738.1 a \$35,000.00 initial deposit in an interest bearing account with a local banking institution will be made at the first time of the first disposition (sale) of grave space. Further, in accordance with California Health and Safety Code 8738 ABC 8738.1 a deposit to the account will be added every time a grave space is sold. The State currently requires \$2.25 per square foot of grave area (approximate grave area is 32 square feet) or \$72.00 per grave to be contributed to an endowment fund for maintenance.

The applicant proposes to collect over three times the state minimum or \$225.00 per grave or interment to be added to their endowment fund for maintenance of the overall cemetery. Thereby providing enough funds to maintain and manage this open space area as an integral park of the overall cemetery. Therefore, requiring an additional endowment would be a hidden tax and effectively a “double taxation” and would be unfair to the consumer.

The requirement for this endowment should be eliminated.

- 2) We note on page 1.0 -23, under Relocation and Construction Management Plan, Mitigation Measure 3.4-2d-revisions to project Master Site plan and Conceptual Landscape Plan, paragraph 3., it states the Master Site Plan shall be revised to provide a minimum 100 foot setback for grading and cemetery-related improvements from the northern tributary drainage and/or northern property line, whichever is greater.

It should be pointed out that the identified tributary drainage is not even two (2) feet deep in some places. It varies in depth from two to four feet and the horizontal location meanders on and off the property. In fact approximately 470 feet of the drainage is on the adjacent proposed New Farms property to the north. The New Farms project will undoubtedly be required to provide a large setback creating an even larger open zone for this drainage when combined with the cemetery.

It is important to note that the proposed ceremonial grounds are generally fifty (50) feet from the tributary drainage along the cemetery's north property line. Also, the proposed graded bank along the north property line is only 4:1, a relatively gentle slope. The only fence in this area will be a barbed wire fence along the property line. Other than that, the flat ceremonial grounds are barrier free and allow for wildlife to move freely along the drainage and across the cemetery and clearly does not compromise opportunities for movement. A cemetery is a very different type of project than a housing project, a shopping center or office complex.

Therefore, the requirement to provide a minimum 100 foot setback should be eliminated and the setback/corridor as shown on the project plan should be approved as submitted.

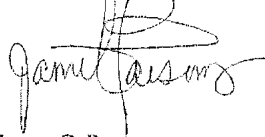
- 3) We note on page 1.0 -54, under Impact 3.11-2: Short Term Ceremonial and Public Safety Noise Increases, in the second paragraph of the Impact Section it states that the ceremonial grounds are proposed to be more than 350 feet from the nearest sensitive receptor (residential units to the west, presumably the Newman residence).

The actual distance from the northeast corner of the Newman residence to the south property line of the cemetery is not 350 feet, but 480 feet. There is approximately an additional 120 feet of distance from the south property line of the cemetery to the edge of the ceremonial grounds. Thus totaling a distance of approximately 600 feet from the northeast corner of the Newman residence to the edge of the ceremonial grounds.

Therefore, the dimension of 350 feet should be corrected and the potential impact should be re-evaluated.

In general we believe the document is through and has been written in a manner that is meaningful and useful to the County decision makers and to the public at large. We think the document is adequate and should be certified as complete.

Very truly yours,
P/A Design Resources, Inc.

A handwritten signature in black ink, appearing to read "James C. Parsons". The signature is written in a cursive style with a large, stylized initial "J".

James C. Parsons
Principal

pc S. Corrie, CDC
P. Klein, CDC



"Jolene Jones"
<jjones@padesignresources.com>

10/28/2011 03:34 PM

To <demian.hardman@dcd.cccounty.us>

cc <corriecompanies@pacbell.net>, "Jim Parsons"
<jparsons@padesignresources.com>

bcc

Subject 2011 10 28 92012-10 Draft Environmental Impact Report

Demian,
Please find attached the Creekside Memorial Park Cemetery Draft
Environmental Impact Report.



2011 10 28 To Demian DEIR.pdf