

March 18, 2013

Mr. Demian Hardman, Planner
Contra Costa County Department of Conservation and Development
Address: 30 Muir Road, Martinez, CA 94553
Email: demian.hardman@dcd.cccounty.us

Subject: Creekside Memorial Park Cemetery (LP05-2096) Justification and Need

Dear Demian:

Understanding the justification and need for the proposed Creekside Memorial Park cemetery is essential, especially given the many serious issues raised in the proposal's Draft Environmental Impact Report. Although we have heard a number of reasons given for why this proposed cemetery is critically needed, none of these reasons stand up to a close scrutiny. We address each of these reasons below, showing why we believe each to be a misconception rather than a valid reason, and what we believe instead to be the true situation.

After the misconceptions are addressed, we are left with only one argument supporting the proposed cemetery: that this cemetery, which would be "close but not too close" to the residents of the Tri-Valley, would be a "nice thing to have." While we completely support the concept of planning for the needs of the future, and we also completely agree that cemeteries should be included in the picture, we also strongly believe that it is essential to understand all of the facts before making a decision. Given the many and critical issues with this proposal which were raised in the DEIR, there seems little reason to recommend a project whose single benefit is that it would be a "nice thing to have."

Misconception #1: There is a critical need for a new cemetery in the Tri-Valley area.

Reality: The existing cemeteries within 10-15 miles of the Tri-Valley towns/cities have sufficient space to cover all needs for at least the next 50 years.

In our earlier memo to you reviewing the justification and need for the proposed Creekside Memorial Park Cemetery (Bill and Holly Newman to Demian Hardman, 4/30/2010) (attached), we concluded that the existing cemetery space in the Tri-Valley area is more than enough to handle projected deaths for at least the next 50 years, and therefore a new cemetery is NOT needed in the Tri-Valley area.

Recognizing that we are not subject matter experts in the field of cemetery need, we recently asked two acknowledged cemetery experts to review our memo and also to review the two earlier memos submitted by the project applicant (P/A Design Resources

to Demian Hardman, 9/30/2009 and 2/5/2010). These two experts, Mr. Tom Gratny¹ and Mr. Ray Young², validated our conclusions and made the following observations (their full letters are attached):

- Both experts supported our conclusion that no new cemetery was needed, although they did find some flaws in our analysis. Mr. Gratny noted, however, that our errors were all on the side of under-estimating existing cemetery capacity, meaning that there is actually more existing capacity in the Tri-Valley area than we had shown, and so even less need for a new cemetery.
- Both Mr. Gratny and Mr. Young noted that since 2010, the cremation rate has increased at a faster rate than we had stated, further reducing the demand for burial space and making the existing cemeteries last longer.
- Mr. Gratny also pointed out that since 2010, many Catholic cemeteries now allow non-Catholic burials. If our analysis were revised to include this change, the supply of burial spaces would increase by at least 150%, since many of the Catholic cemeteries have significant available land.* At the same time, burial demand would increase by 34% (the estimated percentage of Bay Area Catholics), resulting overall in significantly more available burial space and therefore lower demand for a new cemetery.
- Mr. Young noted significant omissions in the P/A Design Resources memos submitted by the applicant, including the omission of the impact of cremations and the omission of the number of burial spaces currently available.

* When we called several Catholic cemeteries in the area, we learned the following:
Holy Sepulchre (Hayward) is using 77 of 115 acres, so 38 acres undeveloped
Queen of Heaven (Lafayette) is using 11 of 198 acres, so 187 acres undeveloped
St. Michael (Livermore) is using 8 of 15 acres, so 7 acres undeveloped

Together, these three cemeteries have 232 undeveloped acres, so even if only one-third (77 acres) were used for non-denominational burials, at an estimated 1,200 full body burials per acre, this equates to 92,000 full body burials. Also, 77 acres is 1.3 times more than the 60 acres proposed for development at Creekside.

¹ Mr. Thomas J. Gratny has been a member of the International Cemetery, Cremation and Funeral Association (ICFA) for over 34 years and is licensed by the Department of Consumer Affairs, State of California as a Cemetery Manager, Cemetery Broker, and a Subject Matter Expert since 1994. Mr. Gratny is also the General Manager of Lone Tree Cemetery in Hayward, giving him insight into the local situation.

² Mr. Ray Young has been in the interment industry for 26 years, and has managed two different cemeteries during this time. He is the manager of the Fair Oaks Cemetery District in Fair Oaks, California, and formerly managed Live Oak Cemetery District in Live Oak, California.

Misconception #2: There is a critical need for a new cemetery in the Tassajara Valley because there are no sizable cemeteries in Danville, San Ramon, Dublin, or Pleasanton, and because the proposed cemetery in the Tassajara Valley would be much closer for these residents than the existing sizable cemeteries.

Reality: While it is true that there are no large cemeteries in these four towns/cities, the location of the proposed cemetery would actually result in only a minor reduction in travel time (less than 5 minutes) when compared to the nearest existing large cemeteries for each town/city.

Although the fact that there are no sizable cemeteries in these towns/cities seems to be a strong argument in favor of establishing a new cemetery, the proposed cemetery’s location in the Tassajara Valley is actually only slightly closer than the existing large cemeteries.

The following table recaps the distances and driving times between Danville, San Ramon, Dublin, and Pleasanton and the proposed cemetery, and the distances and driving times between each of these towns/cities and the one or two existing large cemeteries which are closest to it. The last column shows that **the proposed cemetery would be less than five minutes closer than the existing sizable cemeteries for all four of the towns/cities.** Five Google maps, one for each town/city and one overall map, are also attached, which show this information visually.

Table 1: Distance and driving time between Danville, San Ramon, Dublin, and Pleasanton town/city centers and the proposed and existing sizable cemeteries

Distance / Driving Time <small>(per Google maps)</small>	To Creekside Tassajara Valley (proposed)	To Lone Tree Hayward	To Oakmont / Queen of Heaven Lafayette	To Memory Gardens / St. Michaels Livermore	How much closer would the proposed cemetery be?
From Danville	10.3 mi, 17 min		12.6 mi, 18 min		vs. Oakmont: 2.3 mi, 1 min
From San Ramon	9.8 mi, 17 min	10.6 mi, 21 min	15.9 mi, 21 min		vs. Lone Tree: < 1 mi, 4 min vs. Oakmont: 6.1 mi, 4 min
From Dublin	7.0 mi, 14 min	12.5 mi, 17 min		10.4 mi, 17 min	vs. Lone Tree: 5.5 mi, 3 min vs. Mem Gar: 3.4 mi, 3 min
From Pleasanton	8.3 mi, 18 min	14.7 mi, 22 min		8.3 mi, 19 min	vs. Lone Tree: 6.4 mi, 4 min vs. Mem Gar: 0 mi, 1 min

Comparisons made to town/city centers, defined as: Danville: Hartz Ave and School St; San Ramon: Meadow Glen and Twin Creeks Dr.; Dublin: Civic Center; Pleasanton: Black and Hopyard Rd.

Misconception #3: A new cemetery is needed because existing cemeteries are a fixed size yet people continue to die and need burial space.

Reality: First, established cemeteries can expand by buying adjacent properties, for example, Oakmont Memorial Cemetery recently added one acre which opened up 5,000 new burial sites, extending their life by about 10 years. Lone Tree Cemetery has also expanded recently. Second, as the trend towards cremations continues to increase, existing burial space lasts longer and longer.

Misconception #4: The Tri-Valley Cemetery Committee in 2003-2004 showed that there was a critical need for a new cemetery in the Tassajara Valley.

Reality: The Tri-Valley Cemetery Committee analysis of the need for a new cemetery was incomplete; while they included an estimated death rate, they did not include the key factors of population demographics, the impact of cremations or an estimate of how much existing cemetery space was available in the area.

We have obtained all of the publicly available records of the Tri-Valley Cemetery Committee from Pleasanton and San Ramon, and will be preparing a summary of their contents. Please let us know if you would like a copy.

Conclusion:

- Two experts in the cemetery business have confirmed that there is adequate cemetery space available in the Tri-Valley area, especially given the increasing rate of cremations.
- Although there is currently no sizable cemetery in Danville, San Ramon, Dublin, or Pleasanton (nor do their residents actually want a new cemetery within their town or city limits), the proposed cemetery would be less than five minutes closer in driving time for these residents than are the existing cemeteries located within 10-15 miles of their town/city centers.

Therefore, the only benefit for this cemetery would be that less than five minutes of driving time would be saved by those who would visit it from San Ramon, Danville, Dublin, or Pleasanton, and we do not believe this marginal convenience outweighs the many significant and permanent problems which the proposed cemetery would cause for everyone who lives, works, drives, rides, or plays in the Tassajara Valley, or for those who simply appreciate an unspoiled area.

Regards,

Bill and Holly Newman
415-518-7131 cell

Attachments:

3/18/2013 Google Maps of Danville, San Ramon, Dublin, and Pleasanton showing cemeteries (existing and proposed) within a 10 and 15 mile radius of their town/city centers, and a map showing the location and name of the cemeteries noted in the four individual maps

3/13/2013 memo from Thomas J. Gratny, Cemetery Consultant, regarding “Creekside Memorial Park Cemetery”

3/11/2013 memo from Ray Young, Cemetery Manager, to Bill Newman, regarding “Creekside Memorial Park Development”

4/30/2010 memo from Bill and Holly Newman to Demian Hardman, Contra Costa County Department of Conservation and Development, regarding “Reports from P/A Design Resources, Inc., titled “Creekside Memorial Park – Request for Justification and Need for Project” dated September 30, 2009 and February 5, 2010”